

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

December 2023



State Clearinghouse No. 2020100007

VOLUME I

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Section 1.0 | Executive Summary

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

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

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

1.1 PURPOSE OF THIS ENVIRONMENTAL IMPACT REPORT

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

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

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

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

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

1.2 ENVIRONMENTAL REVIEW PROCESS AND COMMUNITY OUTREACH

Notice of Preparation and Scoping Meetings

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

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

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

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

Draft EIR Public Review Period

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

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

An estimated 715¹ attendees participated in the eight public meetings. Metro received 1,132 comments during the Draft EIR public review period via U.S. mail, email, voicemail, and by submitting written and/or oral comments at the four public hearings.

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

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

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

1.3 PROJECT OBJECTIVES

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

The proposed Project objectives are as follows:

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

1.4 PROJECT OVERVIEW

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

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

1.5 PROJECT LOCATION

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

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

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

1.6 PROPOSED PROJECT ALIGNMENT AND COMPONENTS

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

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

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

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

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

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

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

Alameda Station

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

Alameda Tower

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

Alpine Tower

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

Chinatown/State Park Station

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

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

Broadway Junction

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

Stadium Tower

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

Dodger Stadium Station

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

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

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

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

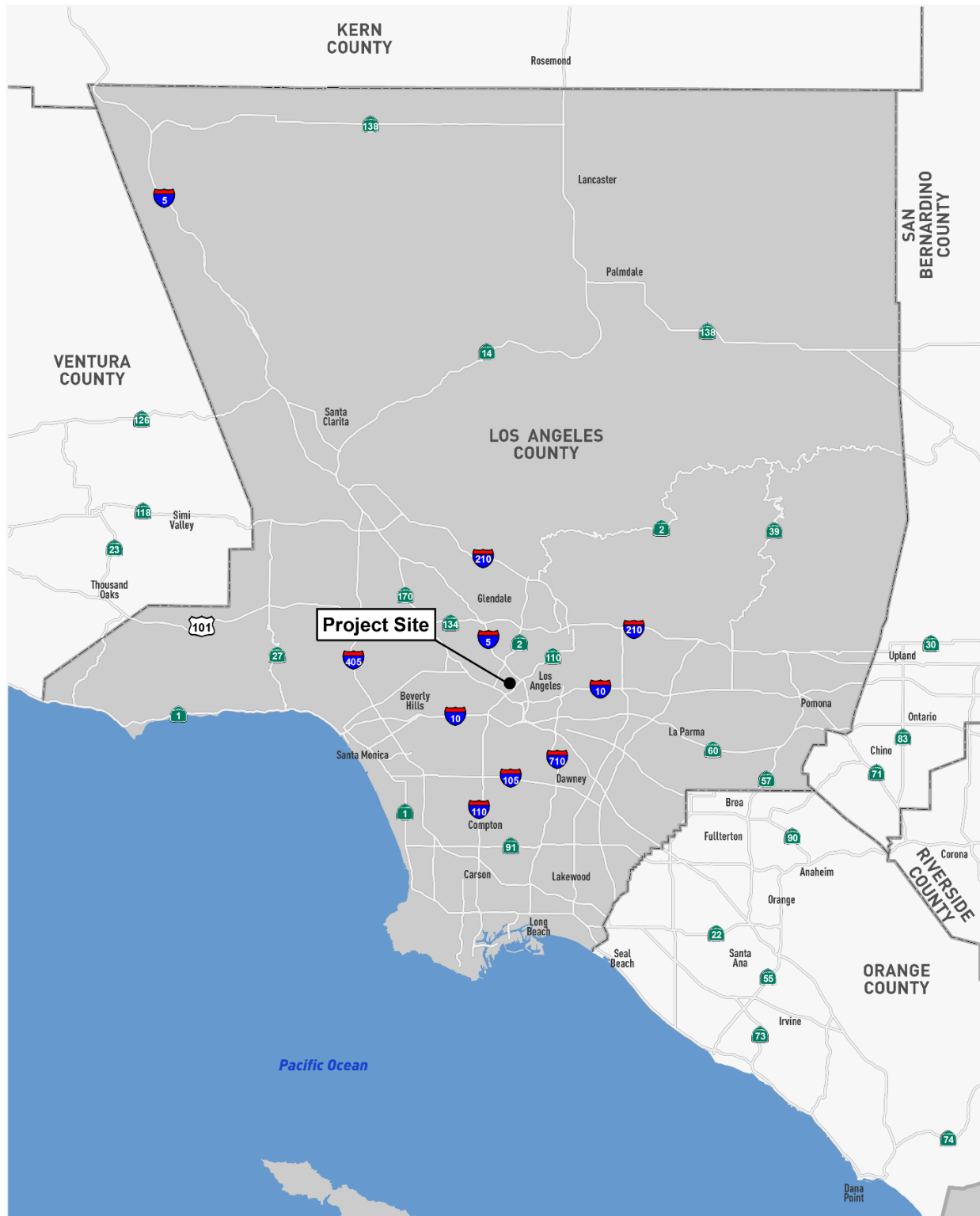


Figure 1-1: Regional Location Map



Figure 1-2: Proposed Project Location



1.7 SYSTEM OPERATIONS

Typical Operating Logistics

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

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

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

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

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

Queueing and Ticketing/Fare Checking

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

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

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

Signage

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

Lighting

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

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

Maintenance

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

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

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

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

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

Safety Systems and Ancillary Elements

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

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

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

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

Emergency Operations Plan

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

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

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

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

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

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

Power Requirements

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

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

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

Sustainability Features

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

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

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

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

Construction

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

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

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

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

Table 1-1: Proposed Project Construction Details

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

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

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

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

1.8 REQUIRED PERMITS AND APPROVALS

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

California Department of Transportation (Caltrans)

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

California State Parks

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

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

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

Los Angeles County Metropolitan Transportation Agency (Metro)

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

City of Los Angeles

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

- c. Approvals, to the extent applicable, to be processed by the Department of City Planning, could include, but not necessarily be limited to, the following:
 - i. Pursuant to LAMC section 11.5.7, the creation of a Specific Plan to provide for consistent application of Project design standards, limitations, and operational measures.
 - ii. Pursuant to LAMC sections 13.11 and 12.32.S, a “SN” Sign District for a comprehensive set of sign regulations on the Project site to permit signage consistent with applicable City requirements.
 - iii. Pursuant to LAMC section 12.24.M, a Plan Approval under the existing 1960 Dodger Stadium Conditional Use Permit (“CUP”) to allow Stadium Tower and Dodger Stadium Station. CUP Condition 4 provides for collaboration “in devising mass transportation service to the Stadium site which will be sufficiently efficient to encourage patronage thereof and thus reduce the number of private automobiles driven to the Stadium events.”
 - iv. Relief from the River Implementation Overlay District, to allow for Alameda Station, Alameda Tower, and Alpine Tower.
 - v. Relief from the Cornfield Arroyo Seco Specific Plan to allow for Chinatown/State Park Station.
- d. Pursuant to Government Code sections 65864 through 65869.5, a Development Agreement between the Project Sponsor and the City of Los Angeles for 20 years.

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

1.9 PROJECT COST AND FUNDING

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

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

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

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

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

1.10 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS

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

Noise and Vibration:

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

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

1.11 ALTERNATIVES TO REDUCE SIGNIFICANT IMPACTS

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

No Project Alternative

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

Spring Street Alignment Alternative

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

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

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

Transportation Systems Management Alternative

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

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

Environmentally Superior Alternative

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

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

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

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

1.12 DESIGN AND USE OPTIONS

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

Design Option A

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

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

Design Option B

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

Design Option C

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

Use Option D

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

Design and Use Option E

Design and Use Option E would include an ADA-accessible pedestrian bridge that would gently slope from the central portion of the Los Angeles State Historic Park, over the Metro L Line (Gold), and up to North Broadway. The entrance to the pedestrian bridge would be located on the south side of Broadway, east of the intersection of North Broadway and Bishops Road, and would provide pedestrian access to neighborhoods and land uses north of Broadway. The Los Angeles State Historic Park General Plan and Final EIR³, developed by the State Park and Recreation Commission, analyzed a potential bridge at this location. The potential bridge could provide much-needed access to the Park for neighborhoods at the Park's northern boundary. Subsequent to the Los Angeles State Historic Park General Plan and Final EIR, the Department of Parks and Recreation conducted the "Bike and Pedestrian Bridge Study," a feasibility study of various bridge design alternatives and locations to explore and evaluate the feasibility of providing safe pedestrian and bike access from the Chinatown and Solano Canyon Communities into the

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

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

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

1.13 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

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

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

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

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

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Table 1-2: Summary of Environmental Impacts

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Section 2.0 | Introduction

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

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

2.1 SUMMARY OF THE PROPOSED PROJECT

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

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

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

2.2 PURPOSE OF THIS FINAL ENVIRONMENTAL IMPACT REPORT

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

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

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

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

2.3 ENVIRONMENTAL REVIEW PROCESS AND COMMUNITY OUTREACH

2.3.1 Notice of Preparation and Scoping Meetings

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

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

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

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

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

2.3.2 Draft EIR Public Review Period

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

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

An estimated 715¹ attendees participated in the eight public meetings. Metro received 1,132 comments during the Draft EIR public review period via U.S. mail, the project email address, voicemail, and by submitting written and/or oral comments at the four public hearings.

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

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

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

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

2.4 SENATE BILL 44

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

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

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

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

2.5 FINAL EIR ORGANIZATION

This Final EIR is comprised of the sections listed below.

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

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

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

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

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

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

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

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

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

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

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Section 23.0 | Project Description

3.1 2.1 OVERVIEW OF THE PROJECT

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

3.2 2.2 ART BACKGROUND

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

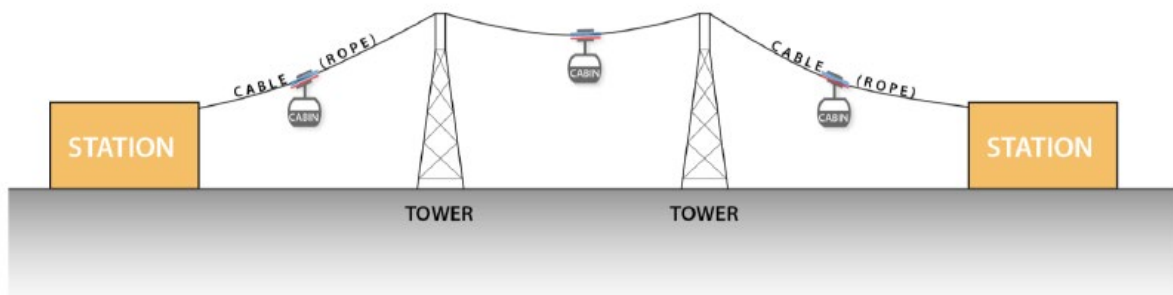


Figure 3-1 2-1: Aerial System Key Components

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

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

3.3 ~~2-3~~ PROJECT LOCATION

The proposed Project is located in the City of Los Angeles, situated northeast of downtown Los Angeles. Figure 3-2 ~~2-2~~ shows the regional location of the proposed Project. The proposed Project would commence adjacent to LAUS and El Pueblo de Los Angeles (El Pueblo) and terminate at Dodger Stadium, with an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. The proposed Project would include three stations, a non-passenger junction, and three cable-supporting towers at various locations along the alignment. As shown in Figure 3-3 ~~2-3~~, the proposed Project location would generally be located within public right-of-way (ROW) or on publicly owned property, following Alameda Street and then continuing along Spring Street in a northeast direction through the community of Chinatown to the southernmost corner of the Los Angeles State Historic Park. The alignment would then continue northeast over the western edge of the Los Angeles State Historic Park and the Los Angeles County Metropolitan Transportation Authority (Metro) L Line (Gold) to the intersection of North Broadway and Bishops Road. At this intersection, the proposed Project alignment would turn and continue northwest following Bishops Road toward its terminus at Dodger Stadium, located in the Elysian Park community. Figure 3-4 ~~2-3~~ provides an overview of the proposed Project location. A more detailed description of the proposed alignment and Project components is provided in Section 3.5 ~~2-6~~.

3.3.1 ~~2-3.1~~ Local Community Context

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

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

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

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

³ City of Los Angeles Department of City Planning, Central City Community Plan, January 2003, available at: <https://planning.lacity.org/plans-policies/community-plan-area/central-city>, accessed March 4, 2022.

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Table 3-1 2-1: ART Precedents								
Location	Photo	Year Opened	Technology	Capacity (persons per hour, per direction)	Distance	Annual Ridership Estimates	Time	Cabin Size
Portland, Oregon		2007 ¹	Reversible Tramway ¹	980 ⁸	0.62 miles ¹	2.1 million (2016) ¹²	4 minutes ¹	79 people ¹
Roosevelt Island, New York		1976 (upgraded 2010) ²	Reversible Tramway ²	1,500 ⁹	0.59 miles ¹¹	2.7 million (2014) ¹⁶	3 minutes ¹¹	110 people ¹¹
La Paz, Bolivia		2014 ³ (newest line added 2019) ¹⁷	Monocable Detachable Gondola ³	3,000 ¹⁰	20.3 miles ¹⁰	101 million (gondola network, 2019) ¹³	5-17 minutes ¹⁰	10 people ³
London, England		2012 ⁴	Monocable Detachable Gondola ⁴	2,500 ⁴	0.68 miles ⁴	1.25 million (2023-19) ¹⁴	5 minutes ⁸	10 people ⁴
Mexico City, Mexico (Mexicable)		2016 ⁵ (newest line added in 2023) ²⁶	Monocable Detachable Gondola ⁵	3,000 ⁵	8.3 miles ^{5, 26}	7.3 million (2019) ¹⁵	17-29 minutes ^{5, 26}	10 people ⁵
Mexico City, Mexico (Cablebus)		2021 ^{23, 24} (new line to open in 2023) ²⁵	Monocable Detachable Gondola ²⁴	4,000 ²⁴	12.26 miles ²³	Not available	26-40 minutes ^{23, 24}	10 people ²⁴

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

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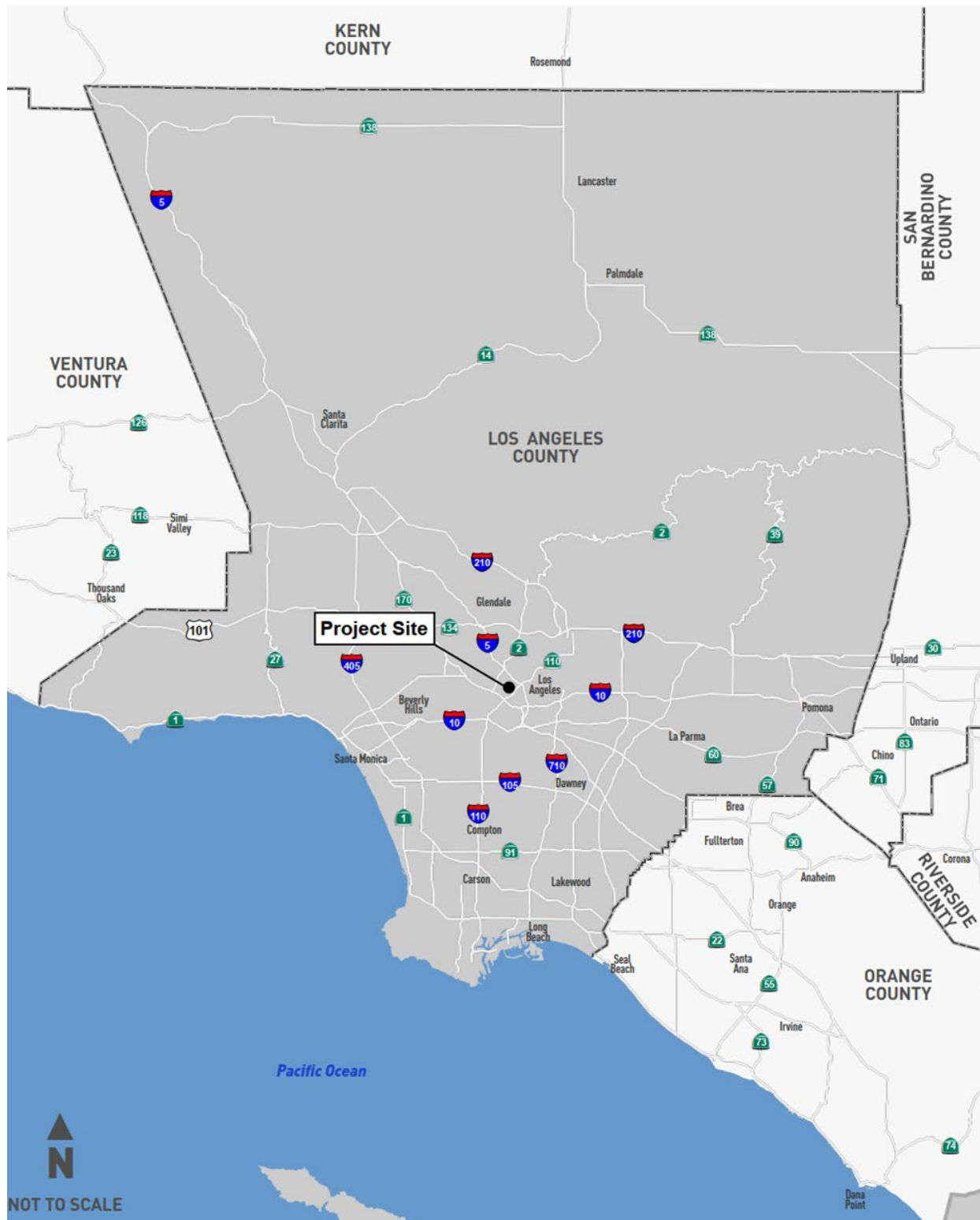


Figure 3-2 2-2: Regional Location Map



Figure 3-3 2-3: Proposed Project Location

LAUS, Chinatown, the Los Angeles State Historic Park, and the Mission Junction neighborhood are located within the Central City North Community Plan Area, which is characterized by low-rise multi-family residential neighborhoods, commercial districts, and industrial uses. The area around LAUS is characterized by transit activity, residential, commercial, and office uses. In the Chinatown community, land uses transition from industrial uses to low-rise commercial and residential uses. The commercial district in Chinatown consists of low-rise buildings with pedestrian-oriented storefronts. As described in the Central City North Community Plan, the businesses in this district provide services for the Chinese population that has historically resided in the area, with restaurants, retail businesses, banks, and professional offices making up an ethnically distinct commercial district that attracts people from throughout the region.⁴ Industrial uses in the Project area are primarily centered around the former site of the historic Southern Pacific Railroad Company's River Station railyard, which is located on the present-day site of the Los Angeles State Historic Park. Mission Junction, the area south and southeast of the Los Angeles State Historic Park, includes a mix of low-rise commercial and retail business, light industrial/warehouse uses, and multi-family residential uses. Farther to the south is the William Mead Homes public housing complex, which is operated by the City Housing Authority and contains over 400 residential units. The Los Angeles State Historic Park is discussed further in Section ~~3.3.4~~ ~~2-3.4~~. On May 3, 2023, the Los Angeles City Council approved the Downtown Community Plan (known as DTLA 2040) and new Zoning Code for the Downtown Community Plan Area. DTLA 2040 consolidates the Central City Community Plan and Central City North Community Plan areas. Following the City Council's approval, the City has entered the implementation phase for DTLA 2040, which the City has indicated can take approximately six months to a year.⁵ After this process, the City Council will bring DTLA 2040 and the new Zoning Code into effect. The analysis in this EIR is based on the current applicable land use and zoning designations for the Central City Community Plan and Central City North Community Plan areas.

The Elysian Park community is located north of downtown Los Angeles and is characterized by medium-density residential neighborhoods, open space areas, and commercial corridors. The Elysian Park community includes Dodger Stadium (discussed further in Section ~~3.3.5~~ ~~2-3.5~~ below), Elysian Park, and Solano Canyon.⁶ Dedicated in 1886, Elysian Park is the oldest and second largest park in the City and features hiking trails, a bike path, horseshoe pits, picnic tables, restroom facilities, a recreation center, Little League baseball fields, Grace E. Simons Lodge event venue, Radio Hill Gardens, Chavez Ravine Arboretum and the Chavez Ravine Disc Golf Course.⁷ Located in the southeastern portion of the Elysian Park community, Solano Canyon consists of a low-density single-family residential neighborhood, directly east of Dodger Stadium.

3.3.2 ~~2-3.2~~ Los Angeles Union Station

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

⁴ City of Los Angeles Department of City Planning, Central City North Community Plan, available at: <https://planning.lacity.org/plans-policies/community-plan-area/central-city-north/>, accessed March 4, 2022.

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⁶ City of Los Angeles Department of City Planning, 2004, Silver Lake-Echo Park-Elysian Valley Community Plan, August 2004, available at: <https://planning.lacity.org/plans-policies/community-plan-area/silver-lake-echo-park-elysian-valley/>, accessed August 16, 2022.

⁷ City of Los Angeles Department of Recreation and Parks, 2006, Elysian Park Master Plan, June 2006, available at: https://www.elysianpark.org/s/EP1_Introduction.pdf, accessed August 16, 2022.

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

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

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

3.3.3 2.3.3 El Pueblo de Los Angeles

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

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

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¹⁰ Los Angeles County Metropolitan Transportation Authority, ~~2018~~, Los Angeles Union Station Forecourt and Esplanade Improvements Project Final Environmental Impact Report, ~~March 2018~~, Available at: <https://www.metro.net/about/lausfei/LAUSFEI-FEIR>. https://www.dropbox.com/sh/55np14p60s3tch0/AABwyW69bkWUScao1ov2-kD2a/Environment%20Documents?dl=0&subfolder_nav_tracking=1, Accessed March 4, 2022.

¹¹ City of Los Angeles, El Pueblo de Los Angeles Historical Monument, About US, Available at: <https://elpueblo.lacity.org/about-us/>, Accessed March 4, 2022.

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

3.3.4 ~~2.3.4~~ Los Angeles State Historic Park

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

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

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

3.3.5 ~~2.3.5~~ Dodger Stadium

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

¹² City of Los Angeles, El Pueblo de Los Angeles Historical Monument, History, available at: <https://elpueblo.lacity.org/history-el-pueblo/>, accessed March 4, 2022.

opening in 1962.¹³ Dodger Stadium is the largest MLB stadium in terms of capacity, with approximately 56,000 seats. In addition to MLB games, other special events are hosted at Dodger Stadium throughout the year. The stadium is directly surrounded by surface parking and is accessible via SR-110, US Route 101 (US 101), and Interstate 5 (I-5) freeways as well as surface streets. It is located within the hills of Elysian Park, and is also surrounded by densely populated residential neighborhoods including Solano Canyon, Echo Park, Elysian Park, Silver Lake, Chinatown, and Angelino Heights.

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

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

3.3.7 ~~2.3.7~~ Purpose and Need

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

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

¹³ Major League Baseball, Dodger Stadium History, Available at: <https://www.mlb.com/dodgers/ballpark/information/history>, Accessed March 4, 2022.

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

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

¹⁴ California Office of Environmental Health Hazard Assessment; CalEnviroScreen 4.0 Map; Available at: <https://oehha.ca.gov/calenviroscreen/maps-data>; Accessed August 16, 2022.

¹⁵ Southern California Association of Governments; 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, or "Connect SoCal"; Available at: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176; Accessed August 11, 2022.

¹⁶ California State Transportation Agency; 2020. Transit and Intercity Rail Capital Program, Fourth Round Selected Project – Project Detail Summary, April 2020; Available at: <https://calsta.ca.gov/-/media/calsta-media/documents/2020-tircp-detailed-project-award-summary.pdf>; Accessed March 4, 2022.

¹⁷ Los Angeles County Metropolitan Transportation Authority; Crenshaw/LAX Transit Project; Available at: https://www.metro.net/projects/crenshaw_corridor/; Accessed March 4, 2022.

¹⁸ Intuit NBA.com; Intuit Dome; Available at: <https://www.nba.com/clippers/intuitdome> <https://www.intuit.com/intuitdome/>; Accessed November 28, 2023.

¹⁹ City of Inglewood; Inglewood Transit Connector Project Final Environmental Impact Report; Available at: https://www.cityofinglewood.org/DocumentCenter/View/17236/ITC_FEIR_Feb2022; Accessed November 2023.



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

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

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

3.3.8 2.3.8 Project Objectives

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

The proposed Project objectives are as follows:

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

²⁰ ESPN.com, 2019, MLB Attendance Report – 2019, [available at: http://www.espn.com/mlb/attendance/_/year/2019](http://www.espn.com/mlb/attendance/_/year/2019), accessed March 4, 2022.

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

3.4 2.4 DESCRIPTION OF THE PROPOSED PROJECT

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

3.4.1 2.4.1 Design

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

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

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

3.4.2 ~~2.4.2~~ Cables and Ropeway Technology

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

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

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

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

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



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



Figure 3-6 2-6: Illustrative Design of a Tower

*This Illustrative design depicts Alameda Tower in the foreground and Alpine Tower in the middle ground.

3.4.3 2.4.3 Stations and Junction

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

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

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

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

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

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

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

3.4.4 ~~2.4.4~~ Towers

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

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

3.4.5 ~~2.4.5~~ Gondola Cabins

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

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

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

3.4.6 2-4.6 Aerial Clearance

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

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

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

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

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

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

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

3.5 ~~2-5~~ PROPOSED PROJECT ALIGNMENT AND COMPONENTS

The proposed Project “alignment” includes the suspended above-grade cables and cabins following the position of the Project components along the proposed alignment from Alameda Station to Dodger Stadium Station. The proposed alignment and locations, heights, widths, sizes, and design of the Project components listed in Section 3.5.1 ~~2-6-1~~ are approximate and may change slightly during final design based on the discretionary entitlements, reviews, and approvals required for implementation of the proposed Project.

3.5.1 ~~2-5.1~~ Proposed Project Alignment

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

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

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

²⁴ *Ibid.*

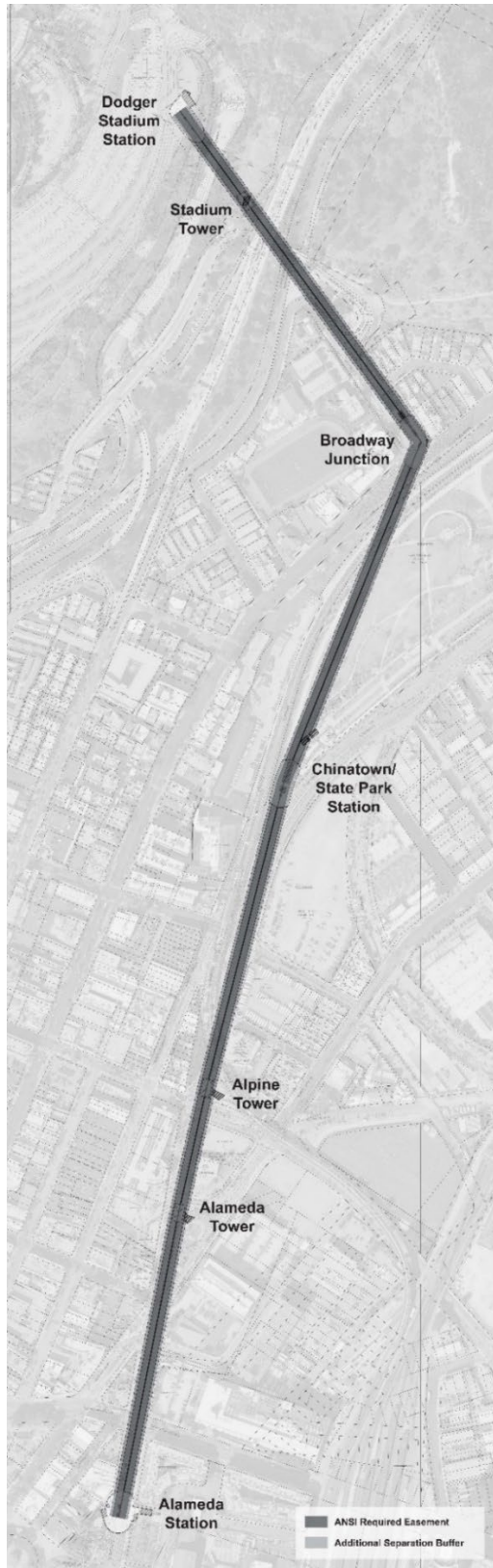


Figure 3-7 2-7: ANSI Requirements and Additional Separation Buffer²⁵

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



Figure 3-8 2-8: Proposed Alignment Over Public ROW/Publicly-Owned Property and Private Property²⁶

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

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

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

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

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

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

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

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

3.5.1.1 ~~2.5.1.1~~ Alameda Station

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



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

3.5.1.2 Alameda Tower

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

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



Figure 3-10: Proposed Improvements at Alameda Triangle

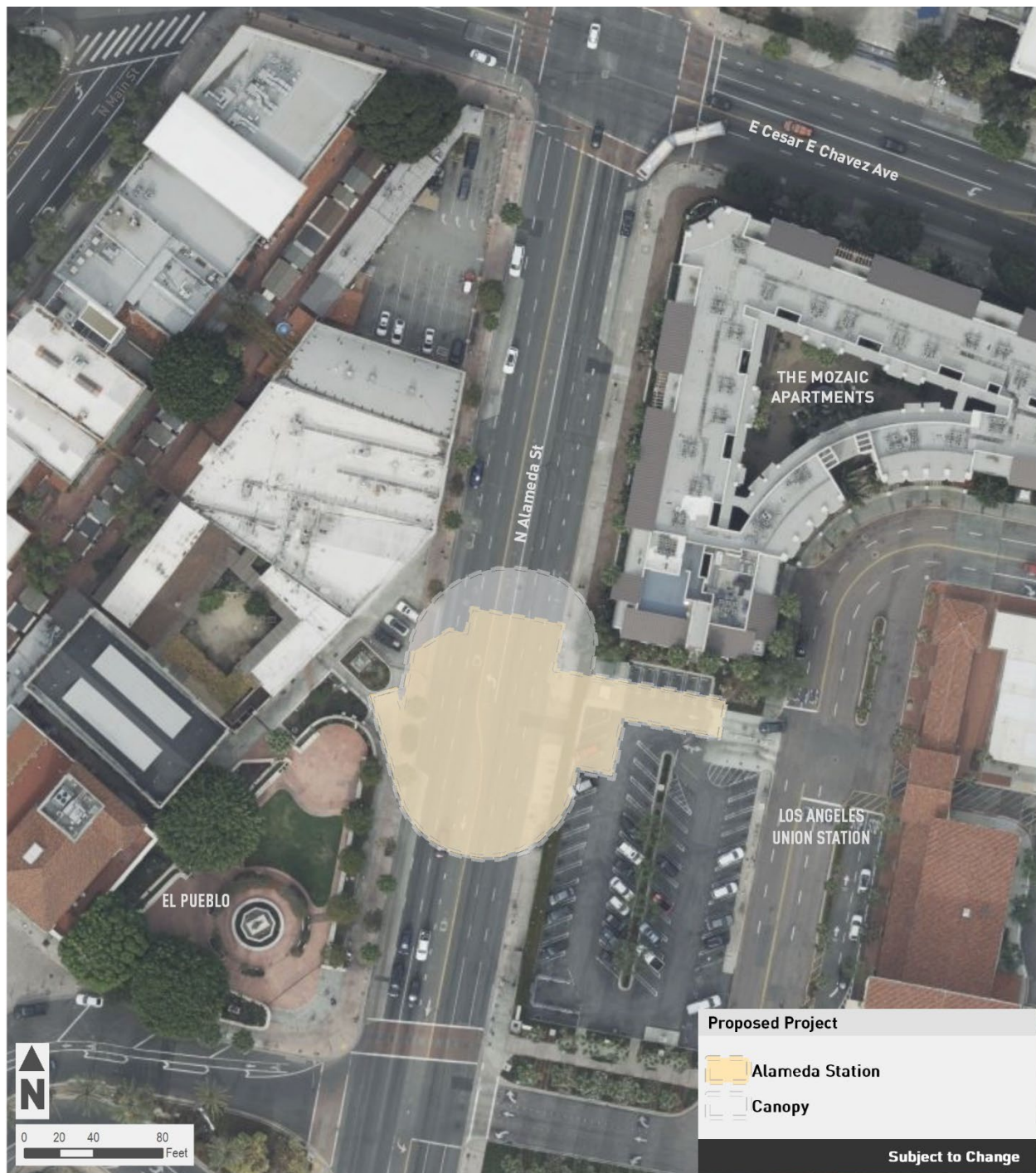


Figure 3-11 2-10: Proposed Alameda Station Location

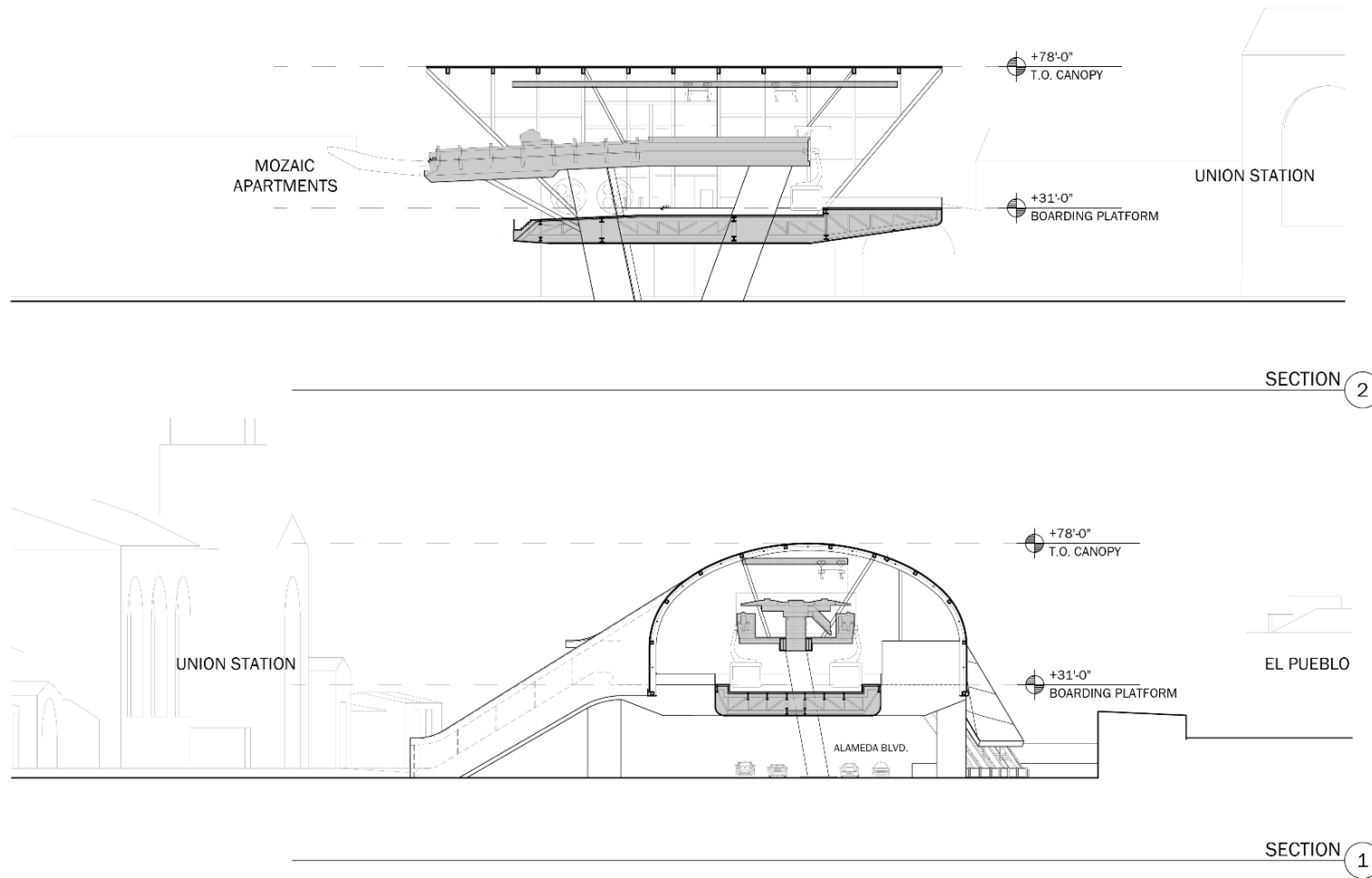


Figure 3-12 2-11: Alameda Station Cross Sections



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

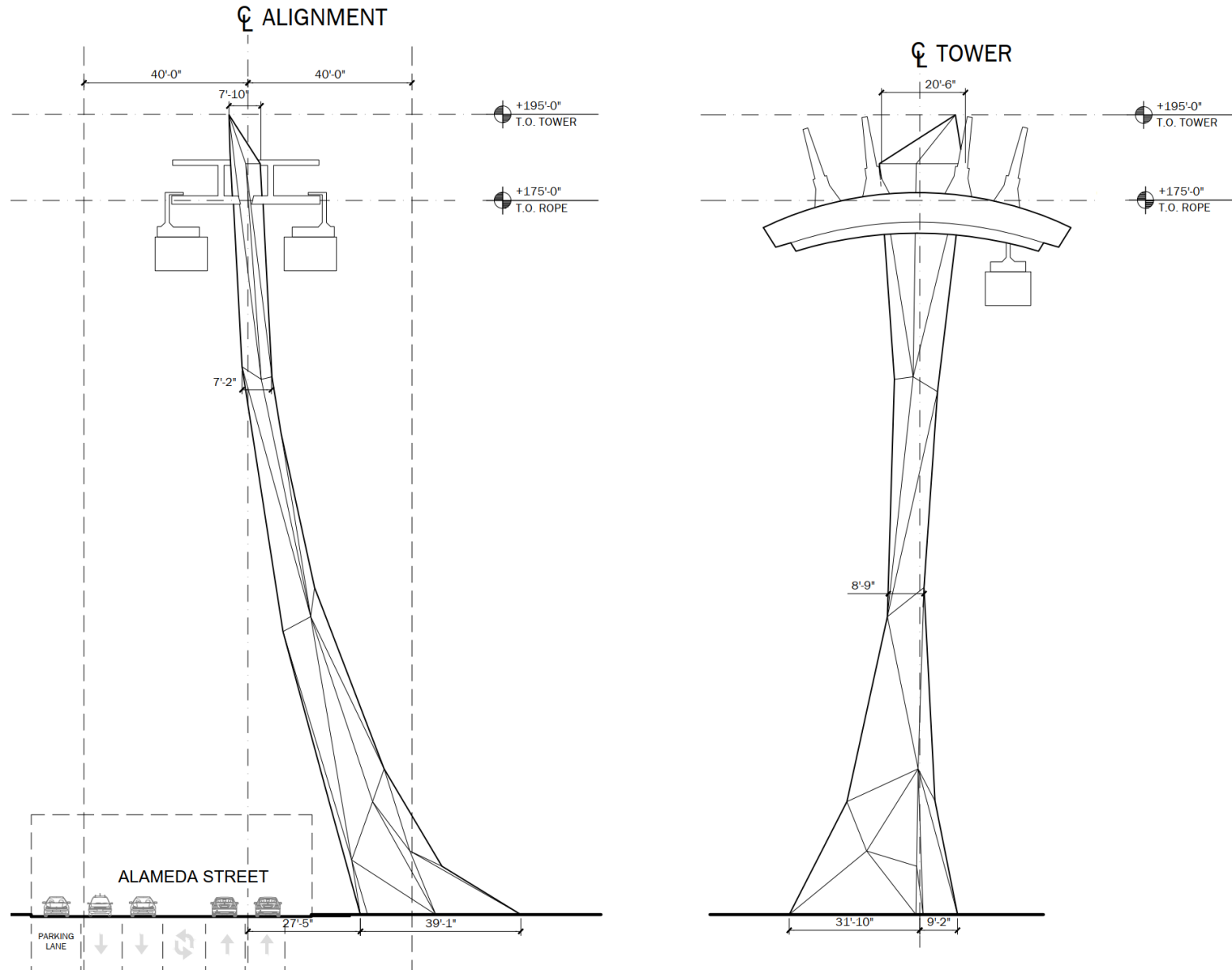


Figure 3-14 2-13: Alameda Tower Elevations

3.5.1.3 ~~2.5.1.2~~ Alpine Tower

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



Figure 3-15: Proposed Improvements at Alpine Tower

3.5.1.4 ~~2.5.1.3~~ Chinatown/State Park Station

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

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

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



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



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



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



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

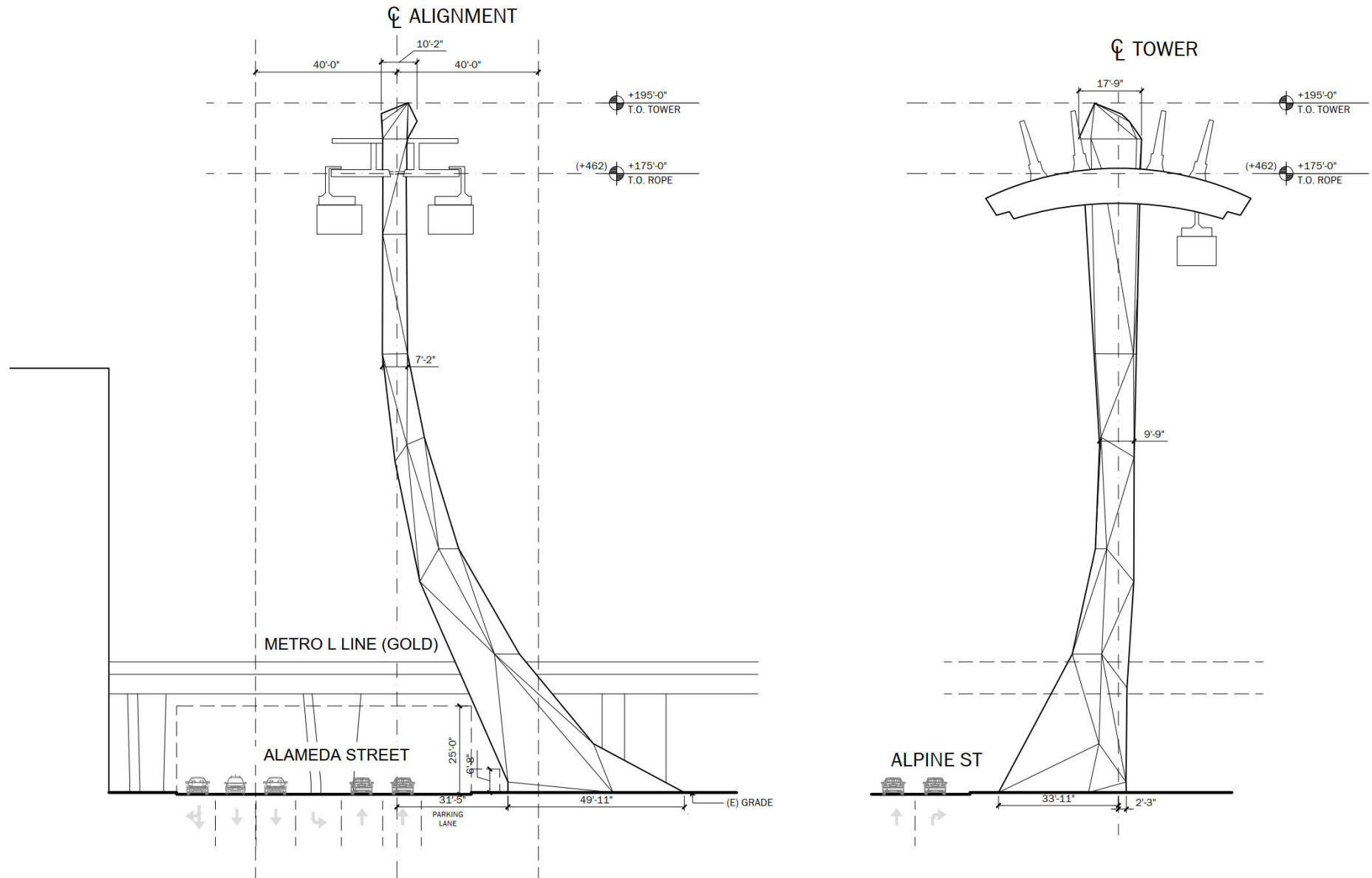


Figure 3-20 2-15: Alpine Tower Elevations



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



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

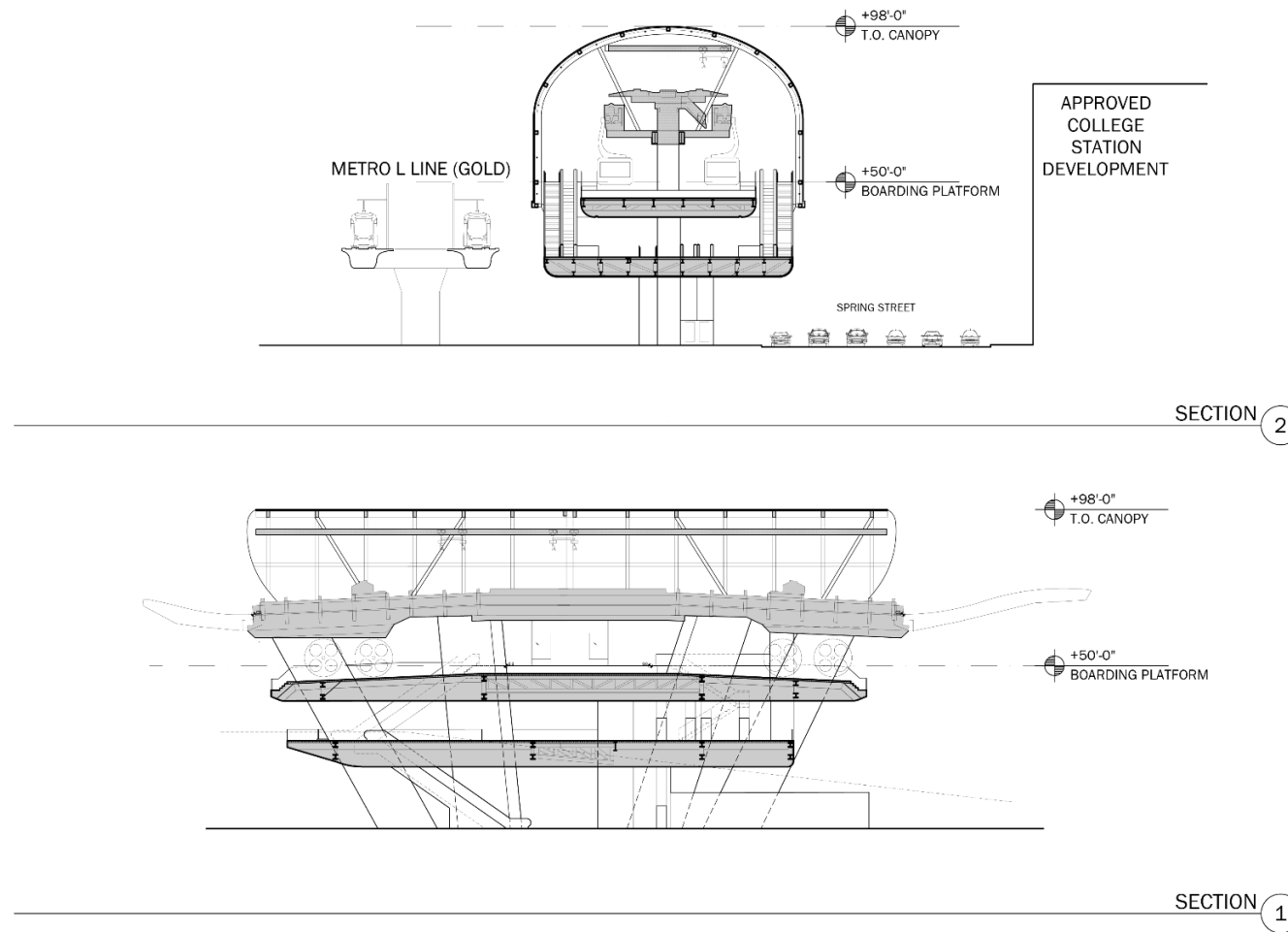


Figure 3-23 2-18: Chinatown/State Park Station Cross Sections

3.5.1.5 ~~2.5.1.4~~ Broadway Junction

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



Figure 3-24: Proposed Broadway Junction

3.5.1.6 ~~2.5.1.5~~ Stadium Tower

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



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

3.5.1.7 ~~2.5.1.6~~ Dodger Stadium Station

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

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

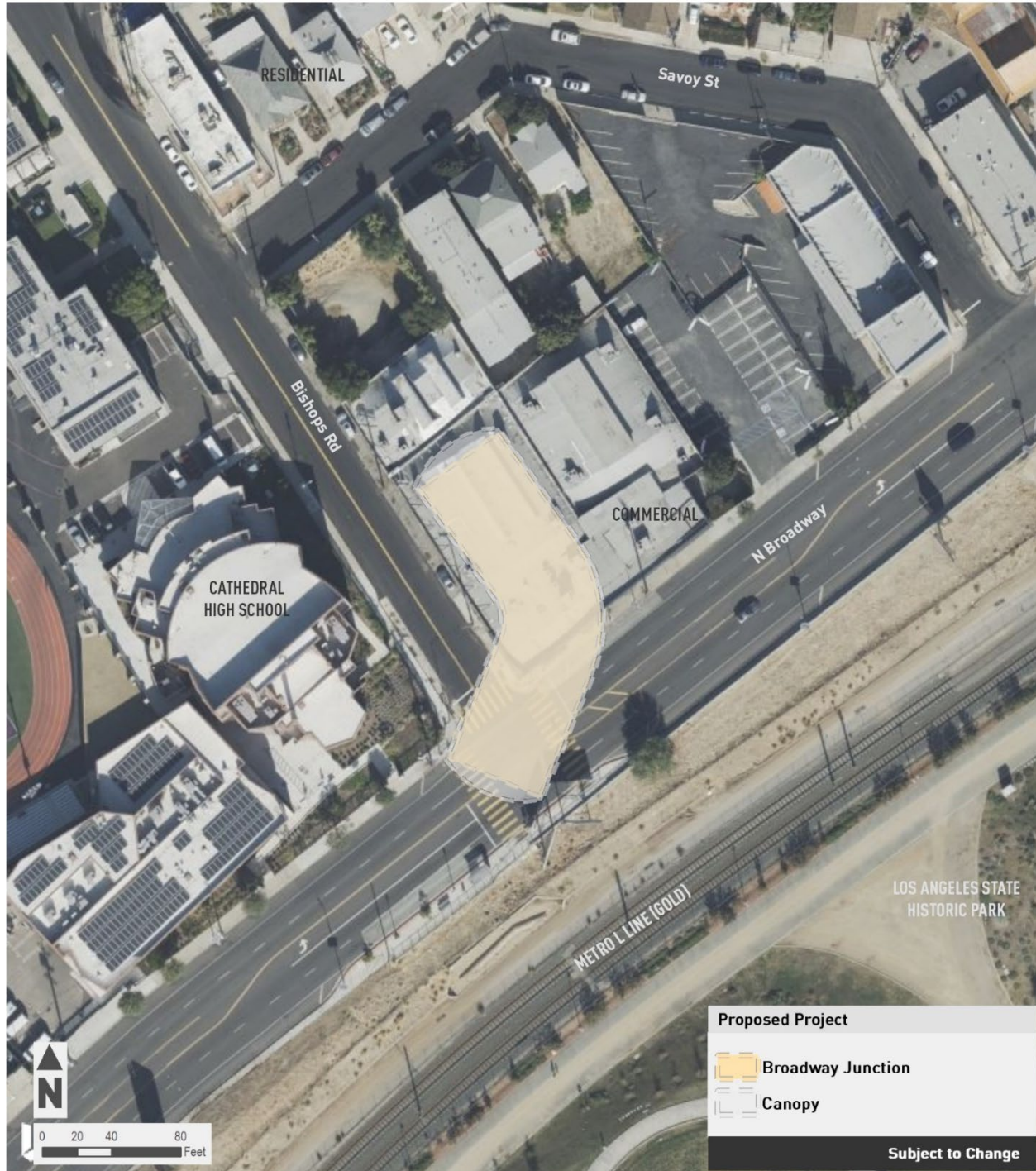


Figure 3-26 2-19: Proposed Broadway Junction Location

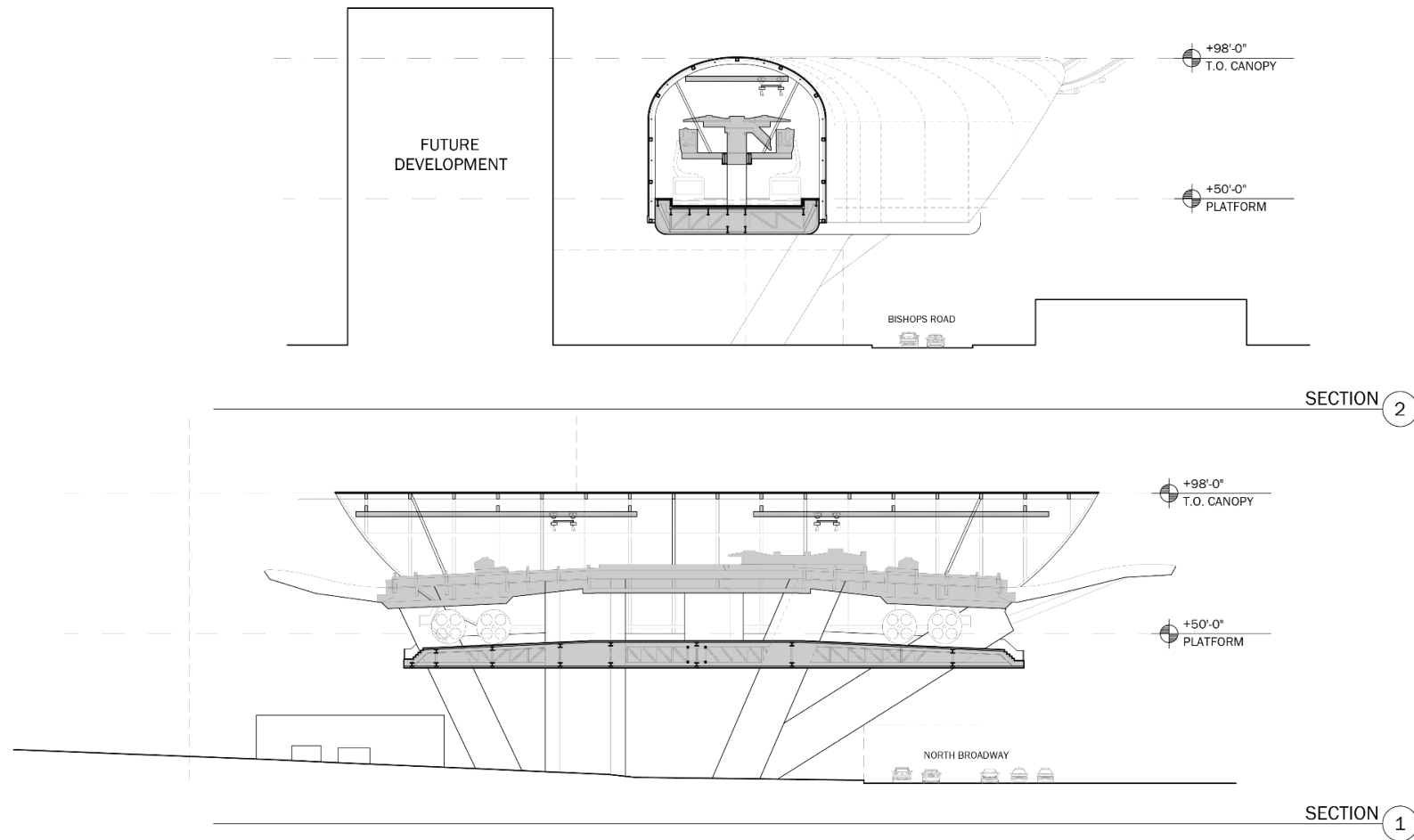


Figure 3-27 2-20: Broadway Junction Cross Sections

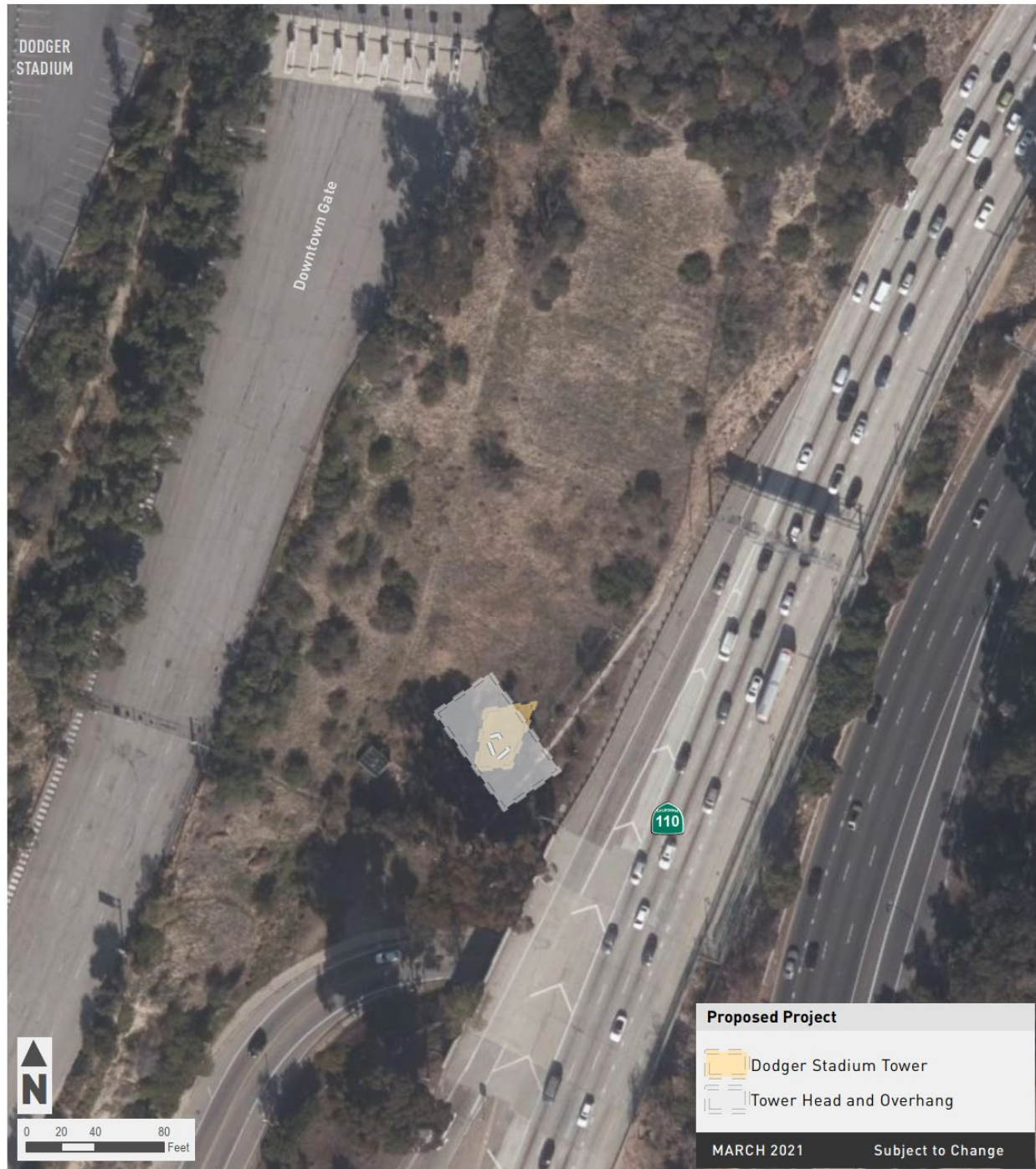


Figure 3-28 2-21: Proposed Stadium Tower Location

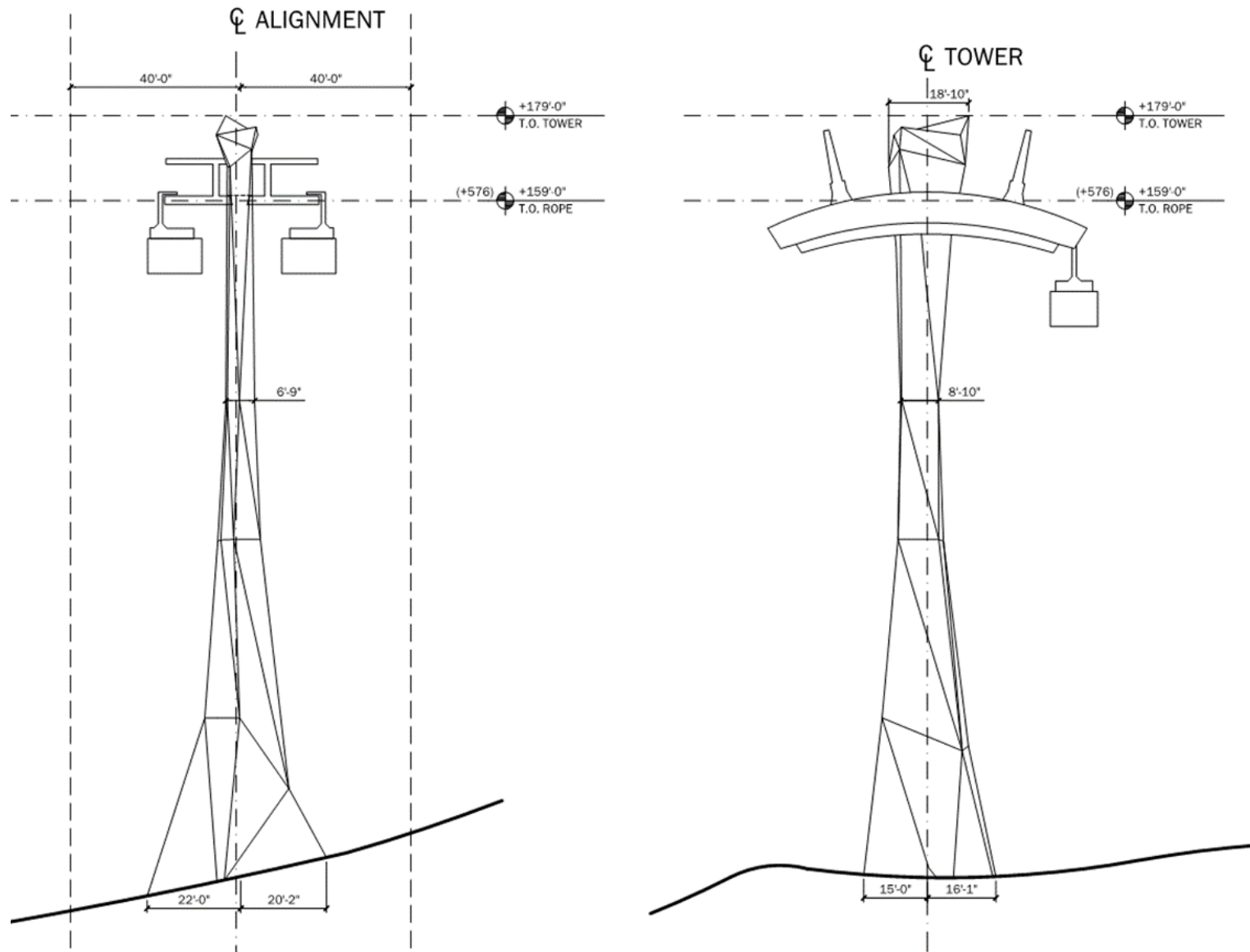


Figure 3-29 2-22: Stadium Tower Elevations



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

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

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



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

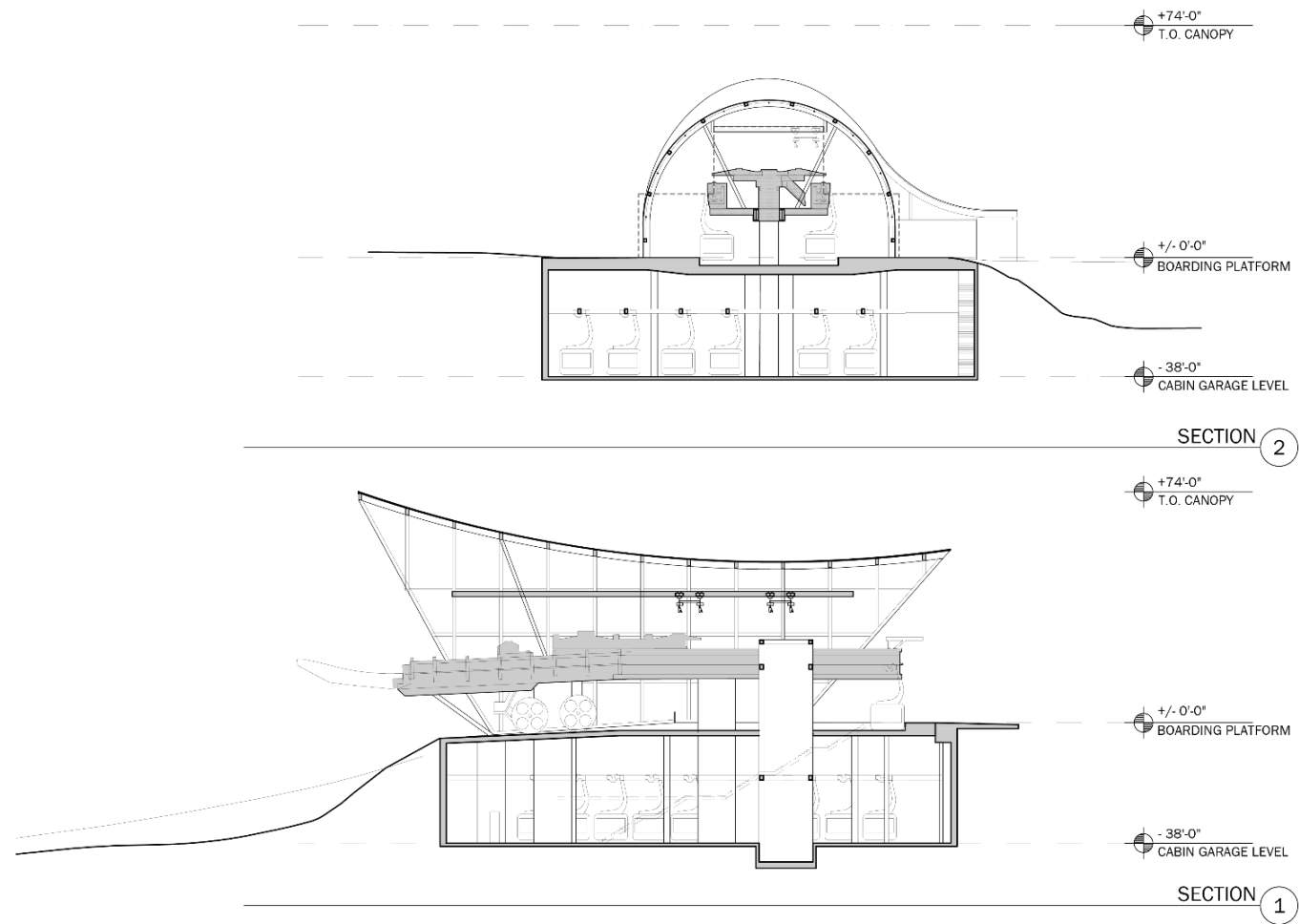


Figure 3-32 2-25: Dodger Stadium Station Cross Sections

3.5.1.8 ~~2.5.1.7~~ Summary of Proposed Project Components

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

3.6 ~~2.6~~ RIDERSHIP

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

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

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

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

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

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

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

Station Name	Location	Passenger Station	Station Size (square feet)	Canopy Size (square feet)	Height of Platform (feet above-ground)	Height of Station (feet above-ground)
Alameda Station	Alameda Street between Los Angeles Street and Cesar E. Chavez Avenue	Yes	15,279	19,217 ^a	31	78
Chinatown/State Park Station^b	Along Spring Street within the southernmost point of Los Angeles State Historic Park	Yes	22,361 ^c	15,212	50	98
Broadway Junction	Intersection of North Broadway and Bishops Road	No	12,615	13,331	50	98
Dodger Stadium Station	Dodger Stadium parking lot	Yes	37,395 ^d	16,001	At-Grade	74
^a . The canopy size square footage for Alameda Station includes approximately 3,064 sf or canopy over the vertical circulation. ^b . Chinatown/State Park Station also includes 1,419 sf of Park Amenities. ^c . The station size square footage for Chinatown/State Park Station includes an approximately 8,063 sf mezzanine. ^d . The station size square footage for Dodger Stadium Station includes an approximately 24,650 sf subterranean area below the station’s platform for storage and maintenance of cabins, as well as staff break rooms, lockers, and parts storage areas.						

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

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

3.7 2-7 SYSTEM OPERATIONS

3.7.1 2-7.1 Typical Operating Logistics

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

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

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

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

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

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

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

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

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

3.7.3 ~~2.7.3~~ Signage

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

3.7.4 ~~2.7.4~~ Lighting

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

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

3.7.5 ~~2.7.5~~ Maintenance

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

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

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

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

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

3.7.6 ~~2.7.6~~ Safety Systems and Ancillary Elements

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

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

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

3.7.7 ~~2-7.7~~ Emergency Operations Plan

Safety and emergency procedures would be separated into two types: personal events and equipment events. As described in Section 3.7.6 ~~2-7.7~~, the proposed Project would be designed to minimize service interruptions resulting from either type of event.

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

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

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

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

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

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

3.7.8 ~~2.7.8~~ Power Requirements

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

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

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

3.7.9 ~~2.7.9~~ Sustainability Features

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

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

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

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

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

(1) Location/Transportation/Quality of Life

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

(2) Sustainable Sites

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

²⁷ 2019 California Green Building Standards Code, 2019. Available at: https://calgreenenergyservices.com/wp/wp-content/uploads/2019_california_green_code.pdf. Accessed November 2023.

²⁸ United States Green Building Council Leadership in Energy and Environmental Design for New Construction v4.1. Available at: <https://www.usgbc.org/leed/v4.1>. Accessed November 2023.

²⁹ The Institute for Sustainable Infrastructure’s Envision Rating System, Available at: <https://sustainableinfrastructure.org/envision/use-envision/>. Accessed November 2023.

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

(3) Water Efficiency

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

(4) Energy Conservation

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

(5) Materials and Resources

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

(6) Indoor Environmental Quality

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

3.8 ~~2-8~~ CONSTRUCTION

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

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

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

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

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

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

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

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

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

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

3.9 2.9 PROJECT BUILDOUT

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

3.9.1 2.9.1 Alameda Station

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

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

3.9.2 2.9.2 Alameda Tower

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

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

3.9.3 ~~2.9.3~~ Alpine Tower

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

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

3.9.4 ~~2.9.4~~ Chinatown/State Park Station

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

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

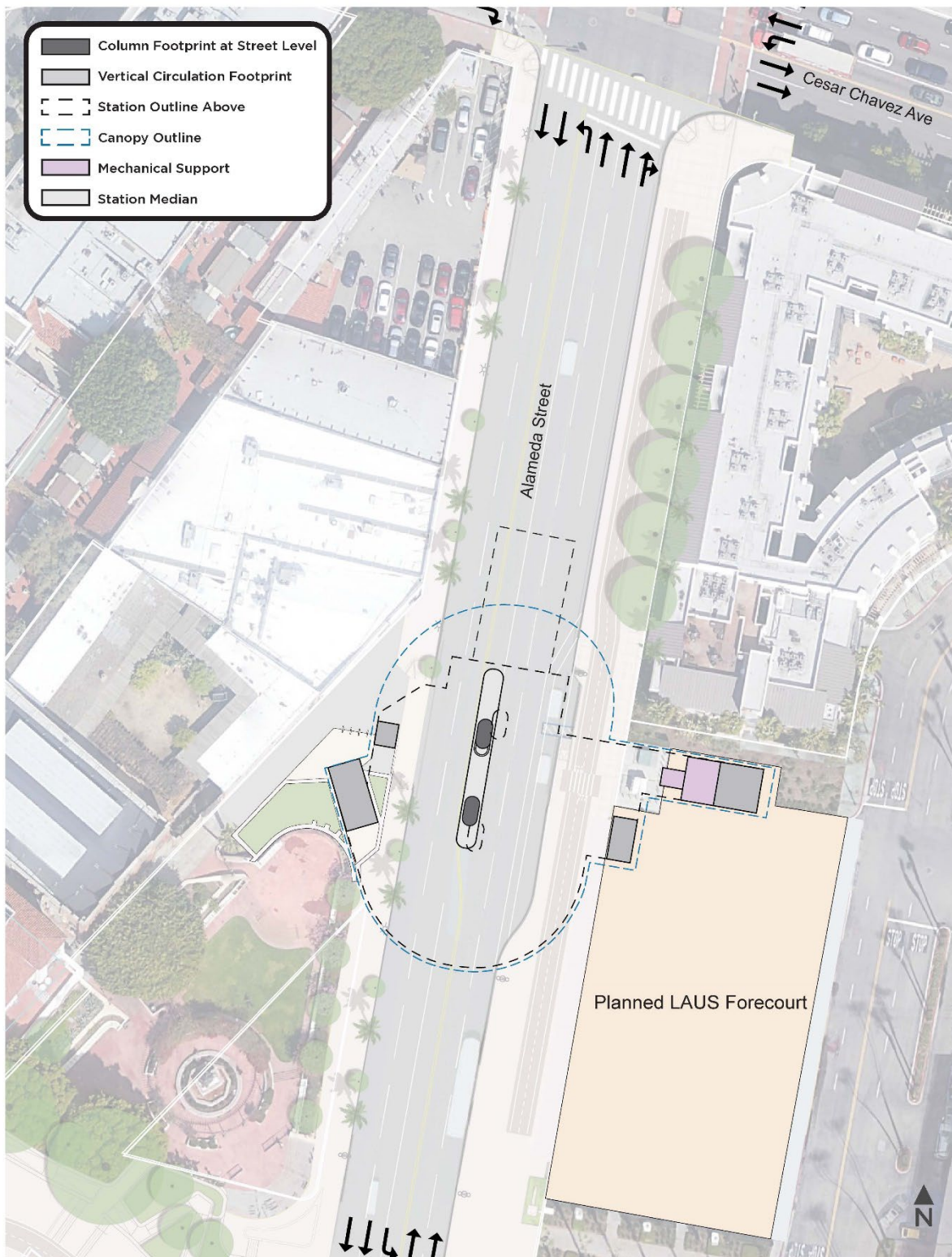


Figure 3-33 2-26: Alameda Station Buildout Conditions

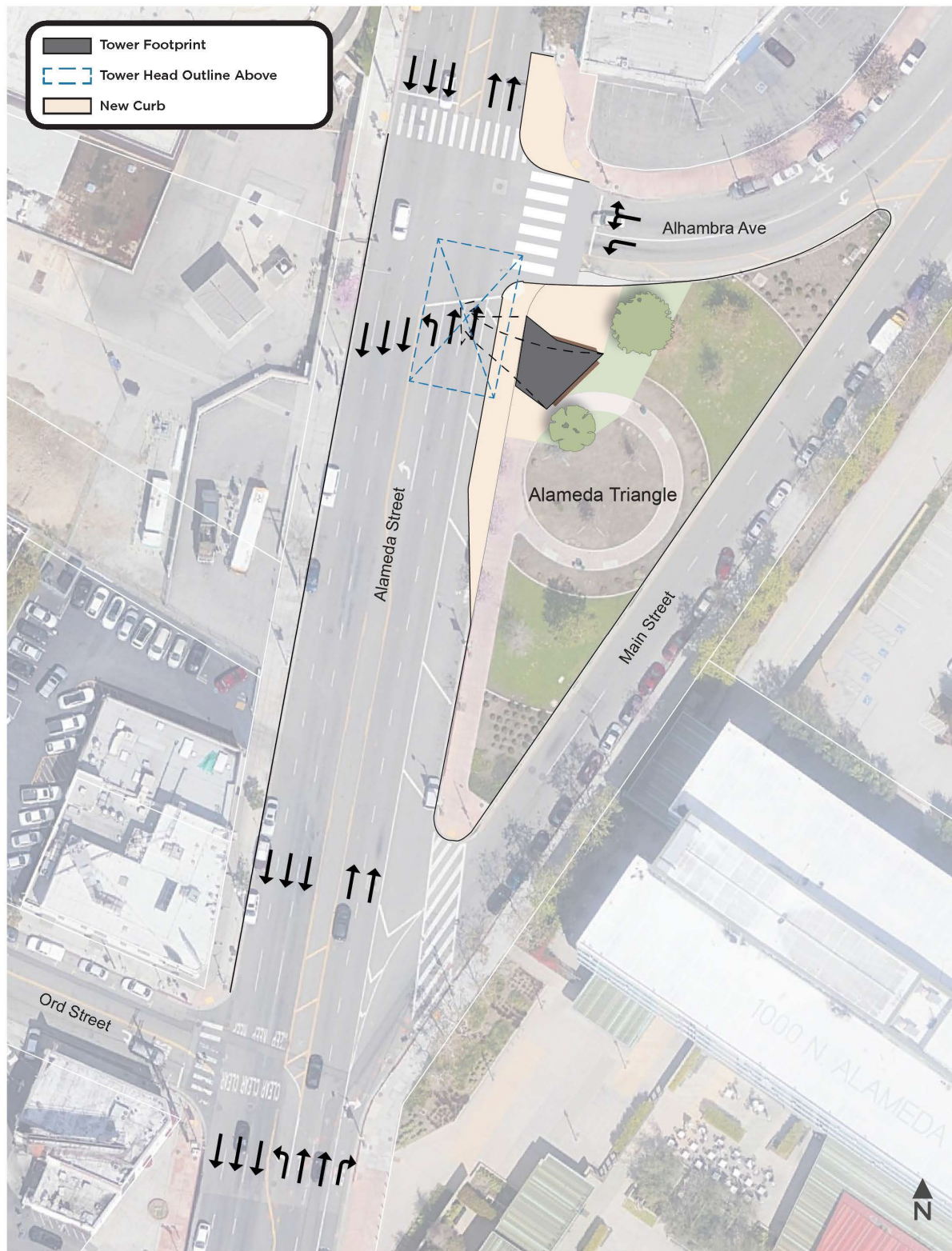


Figure 3-34 2-27: Alameda Tower Buildout Conditions

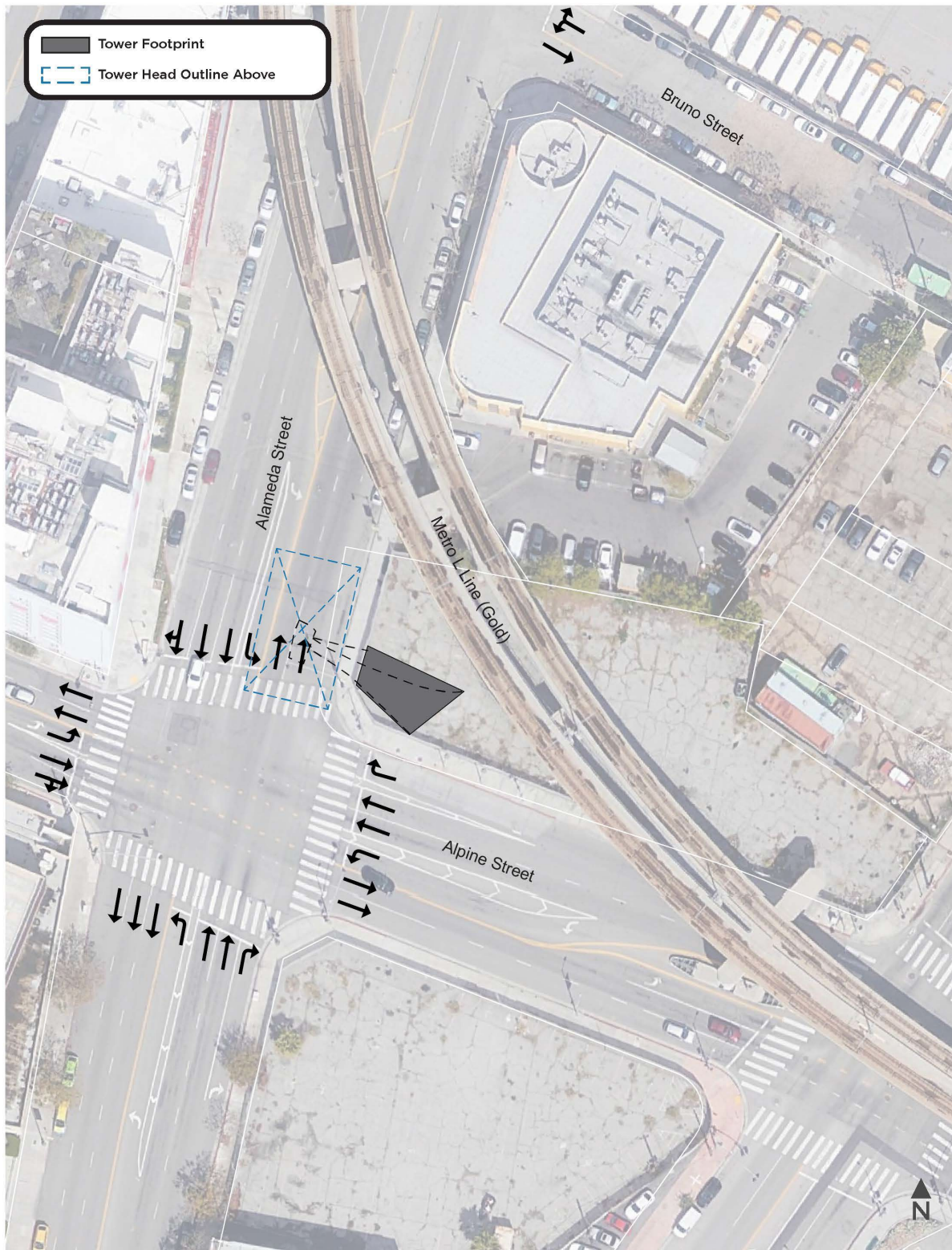


Figure 3-35 2-28: Alpine Tower Buildout Conditions

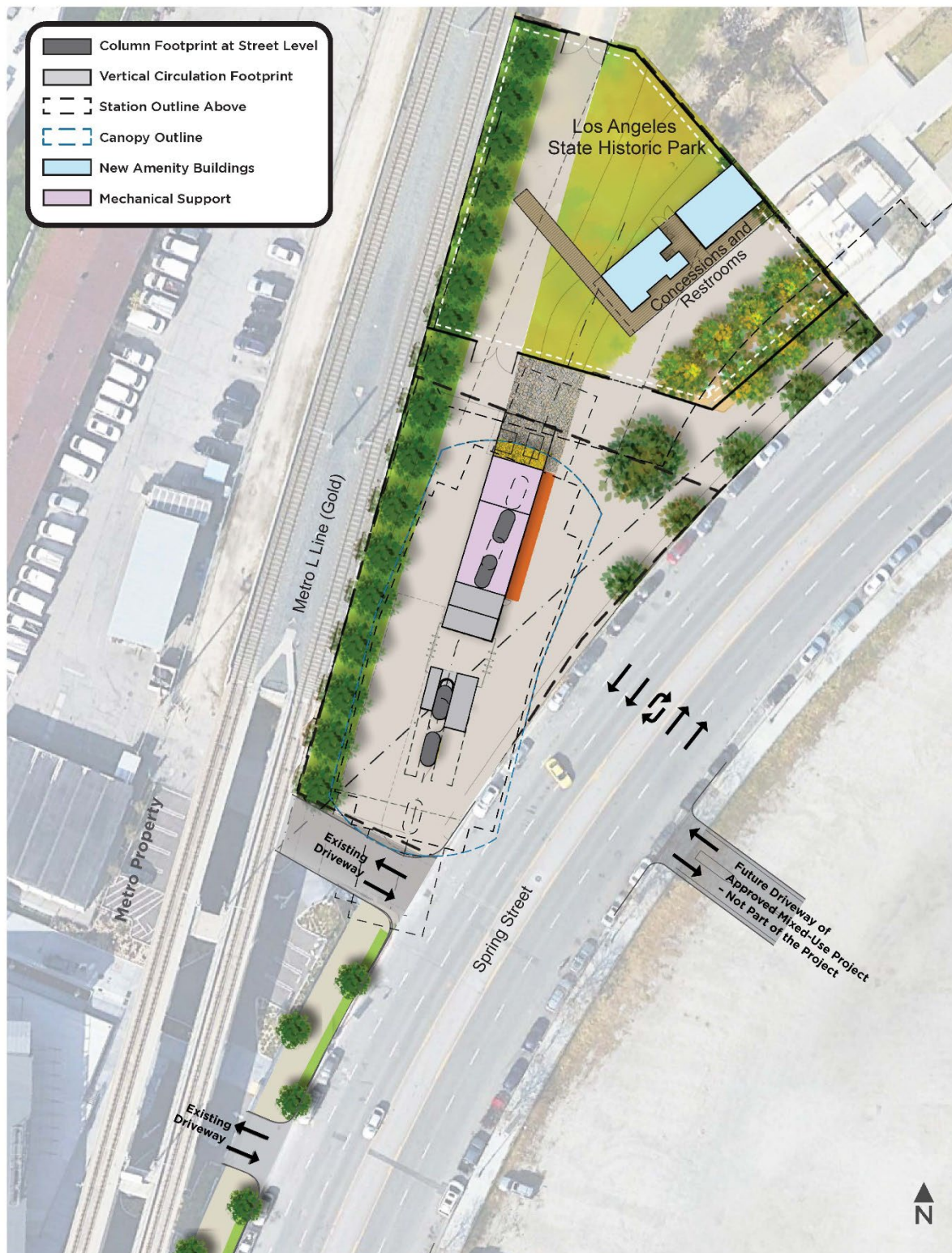


Figure 3-36 2-29: Chinatown/State Park Station Buildout Conditions

3.9.5 ~~2.9.5~~ Broadway Junction

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

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

3.9.6 ~~2.9.6~~ Stadium Tower

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

3.9.7 ~~2.9.7~~ Dodger Stadium Station

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



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

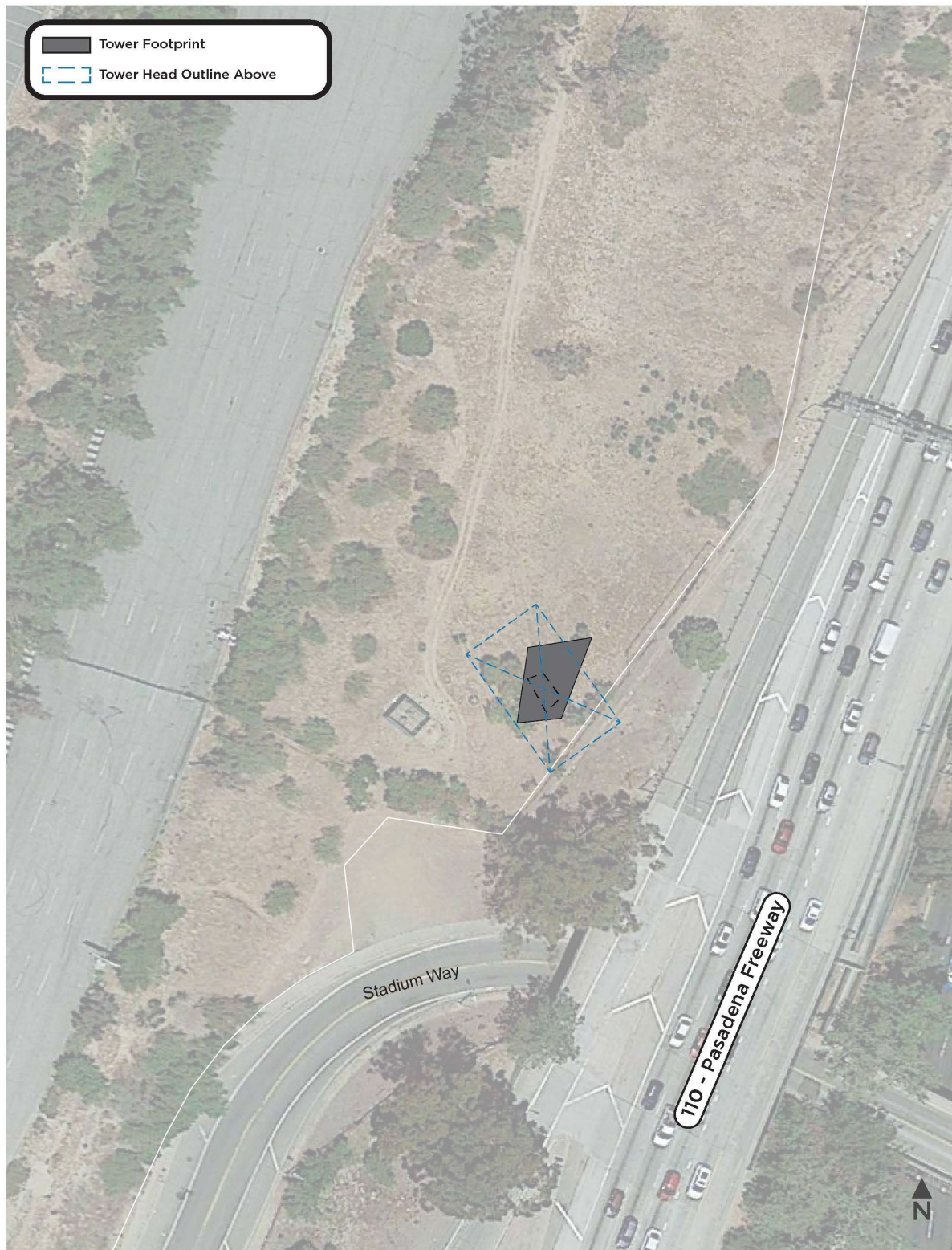


Figure 3-38 2-31: Stadium Tower Buildout Condition



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

3.10 ~~2.10~~ REQUIRED PERMITS AND APPROVALS

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

California Department of Transportation (Caltrans)

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

California State Parks

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

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

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

Los Angeles County Metropolitan Transportation Agency (Metro)

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

City of Los Angeles

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

- a. Pursuant to Charter section 390 and Los Angeles Administrative Code section 13.4, to the extent applicable, to be processed by the Department of Public Works, Bureau of Engineering and the Department of Transportation, a franchise agreement to operate “upon, over, under, or along any street, highway or other place in the City of Los Angeles.”
- b. Pursuant to Los Angeles Administrative Code section 22.109, to the extent applicable, approval of the design from the Cultural Affairs Commission for the Project components located within the public right-of-way.
- c. Approvals, to the extent applicable, to be processed by the Department of City Planning, could include, but not necessarily be limited to, the following:
 - i. Pursuant to LAMC section 11.5.7 the creation of a Specific Plan to provide for consistent application of Project design standards, limitations, and operational measures.
 - ii. Pursuant to LAMC sections 13.11 and 12.32.S, a “SN” Sign District for a comprehensive set of sign regulations on the Project site to permit signage consistent with applicable City requirements.
 - iii. Pursuant to LAMC section 12.24.M, a Plan Approval under the existing 1960 Dodger Stadium Conditional Use Permit (“CUP”) to allow Stadium Tower and Dodger Stadium Station. CUP Condition 4 provides for collaboration “in devising mass transportation service to the Stadium site which will be sufficiently efficient to encourage patronage thereof and thus reduce the number of private automobiles driven to the Stadium events.”
 - iv. Relief from the River Implementation Overlay District, to allow for Alameda Station, Alameda Tower, and Alpine Tower.
 - v. Relief from the Cornfield Arroyo Seco Specific Plan to allow for Chinatown/State Park Station.
- d. Pursuant to Government Code sections 65864 through 65869.5, a Development Agreement between the Project Sponsor and the City of Los Angeles for 20 years.

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

Section 4.0 | Costs and Financing

4.1 INTRODUCTION

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

4.2 COSTS AND FUNDING

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

4.2.1 Capital Costs

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

Table 4-1 Capital Cost Estimates for the Proposed Project

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

4.2.2 Operating and Maintenance Costs

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

4.2.3 Capital Funding Sources

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

¹ Refer to Topical Response K, Signage and Lighting.

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Section 5.0 | Corrections and Additions

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

5.1 GENERAL CORRECTIONS AND ADDITIONS TO THE DRAFT EIR

5.1.1 Metro's Regional Connector

Subsequent to the release of the Draft EIR, Metro's Regional Connector opened on June 16, 2023.¹ The Regional Connector extends the Metro light-rail system to connect the Little Tokyo/Arts District Station to the 7th Street/Metro Center Station through the development of three new stations at 1st Street and Central Avenue (Little Tokyo/Arts District Station), 2nd Street and Broadway (Historic Broadway Station), and 2nd Place and Hope Street (Grand Avenue/Bunker Hill Station). This project improves regional access by providing a direct connection between each end of the light rail system (Azusa to Long Beach and East Los Angeles to Santa Monica). As discussed in Section 5.2.17, Transportation, of Section 5.0, Other CEQA Considerations, of the Draft EIR, with the opening of the Regional Connector, passengers will no longer need to transfer at Los Angeles Union Station and are expected to experience reduced travel times.

5.1.2 Metro L Line (Gold) Name Change

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

5.1.3 Downtown Community Plan

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

5.1.4 Mobility Hub at Dodger Stadium

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

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

5.1.5 Additional Separation Buffer

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

5.1.6 LADWP Service Letter

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

5.1.7 Senate Bill 44 Extension | Senate Bill 91

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

5.1.8 Aesthetics

Analysis of Supplemental KOPs in Response to Comments

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

5.1.9 Biological Resources

CDFW Recommended PDFs

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

Updated Tree Report

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

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

Additional March 23, 2023 Biological Resources Survey

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

5.1.10 Cultural Resources

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

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

5.1.11 Greenhouse Gas Emissions

GHG-PDF-A

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

5.1.12 Hazards and Hazardous Materials

MM-HAZ-A

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

Appendix M, Potential Excavated Material Disposal Analysis

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

5.1.13 Land Use and Planning

Rim of the Valley Trail Corridor

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

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

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

El Pueblo

a) El Pueblo General Plan

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

b) El Pueblo Master Plan

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

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

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

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

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

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

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

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

5.1.14 Noise

3S Gondola System Sound Measurements Memo

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

Revisions to Mitigation Measure VIB-A

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

5.1.15 Transportation

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

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

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

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

Dodger Stadium Game / Event Fares

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

Tourist Ridership

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

5.1.16 Wildfire

Memo Regarding Attorney General Guidance

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

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

5.1.17 Alternatives

Pedestrian Enhancement Alternative

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

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

5.1.18 Other CEQA Considerations

Chavez Ravine

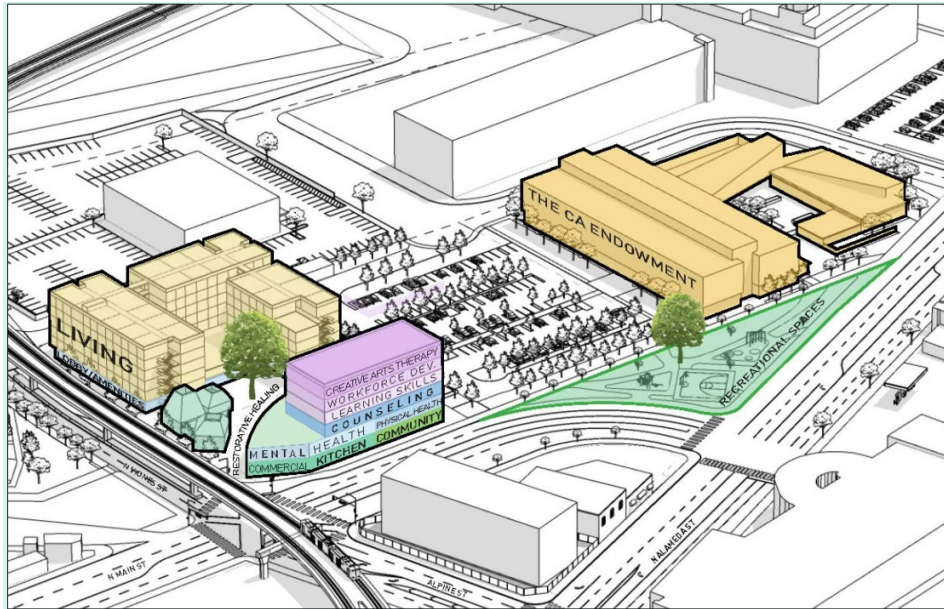
As described in Appendix F, Archaeological and Paleontological Resources Assessment, and Appendix G, Historical Resource Technical Report, of the Draft EIR, the former site of the community of Chavez Ravine, including the neighborhoods of Palo Verde, La Loma, and Bishop, is the current location of the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

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

Hope Village

Subsequent to the release of the Draft EIR, The California Endowment published its Annual Report 2023⁵ with additional information regarding the Hope Village, which anticipates offering housing, community, and health services to formerly incarcerated, unhoused, and economically disadvantaged residents. A graphic in the Annual Report 2023 depicts the Alameda Triangle, a City ROW between Alameda Street, North Main Street, and Alhambra Avenue, as “RECREATIONAL SPACES.”

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



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

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

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



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

Office Building at 130 West College Street

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

5.1.19 Appendix Q, Proposed Alignment Plan and Profile

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

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

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

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

5.1.20 Design Options A and B Plan and Profile

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

5.2 CORRECTIONS AND ADDITIONS TO DRAFT EIR SECTIONS AND APPENDICES

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

ES: EXECUTIVE SUMMARY

Page ES-10, revise the paragraph as follows:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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SECTION 1.0 INTRODUCTION

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

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

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

SECTION 2.0 PROJECT DESCRIPTION

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

SECTION 3.0 ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION

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

SECTION 3.01 AESTHETICS

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

SECTION 3.02 AGRICULTURE AND FORESTRY RESOURCES

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

SECTION 3.03 AIR QUALITY

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

SECTION 3.04 BIOLOGICAL RESOURCES

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

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

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

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

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

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

Results of the tree inventory prepared for the Project (provided in Appendix E) are also incorporated, and referenced for each Project component site.¹

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Cable heights at:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

3.4.5 Project Design Features

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

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

- (1) Monitoring for first 5 years of Project operation: All Project operations and maintenance personnel, including subcontractors, shall undergo training on how to identify and report avian and bat injuries or mortalities detected in the Project area during routine maintenance activities.
- (2) An adaptive management table will be developed, outlining measures to implement upon detection of incidents associated with common species and special status species.
- (3) Annual reporting criteria and requirements.

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

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

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

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

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

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

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

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

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

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

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

SECTION 3.05 CULTURAL RESOURCES

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

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

Chinatown/State ~~Historic~~ Park Station

Page 3.5-63, revise as follows:

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

Construction Impacts

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

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

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

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

Page 3.5-64, revise as follows:

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

Page 3.5-65, revise as follows:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Page 3.5-71, revise as follows:

3.5.7 Level of Significance after Mitigation

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

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

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

SECTION 3.06 ENERGY

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

SECTION 3.07 GEOLOGY AND SOILS

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

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

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

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

SECTION 3.08 GREENHOUSE GAS EMISSIONS

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

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

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

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

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

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

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

3.8.5 Mitigation Measures-Project Design Feature

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

3.8.6 Mitigation Measures

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

3.8.67 Level of Significance after Mitigation

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

SECTION 3.09 HAZARDS AND HAZARDOUS MATERIALS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION 3.10 HYDROLOGY AND WATER QUALITY

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

SECTION 3.11 LAND USE AND PLANNING

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

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

El Pueblo de Los Angeles General Plan

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

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

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

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

- 1) The relationship and connection from the Plaza Substation to Placita de Dolores should be studied and improved.
- 2) The transition between the Plaza and Placita de Dolores needs special design attention.
- 3) To successfully relate El Pueblo to Union Station [Los Angeles Union Station, LAUS], pedestrian crossings should be studied.
- 4) Improvements to Placita de Dolores for expanded function, landscaping, and connections with other site areas are recommended. This should be coordinated with the development of the Plaza Substation and its facade restoration, as well as with the designs for possible connection to Union Station.
- 5) Strong design relationships should be established between the Plaza, Placita de Dolores, Father Serra Park, and possible linkage to Union Station.⁹¹

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

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

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

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

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

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

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

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

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

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

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

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

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

El Pueblo General Plan

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION 3.12 MINERAL RESOURCES

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

SECTION 3.13 NOISE

In addition to the general corrections and additions provided above, revise Section 3.13, Noise, as follows:

Pages 3.13-72 to 3.13-43, revise Mitigation Measure VIB-A as follows:

VIB-A: Vibration Monitoring: Prior to the issuance of grading permits for the proposed Project, the Project Sponsor shall design a Vibration Monitoring Plan. The Plan shall provide for:

- Vibration Monitoring Equipment: the placement of vibration monitoring equipment ~~at least~~ approximately 26 feet away from the Avila Adobe (1970s addition), El Grito mural wall, and The Old Winery by a qualified professional for real-time vibration monitoring for construction work at the Alameda Station requiring heavy equipment or ground compaction devices.
- Modification of Vibration Equipment: the monitoring devices shall notify the construction crew if vibration levels are within 0.1 PPV, in/sec, of the vibration damage threshold. The construction crew shall modify the construction equipment to ensure that the vibration damage threshold is not exceeded.

SECTION 3.14 POPULATION AND HOUSING

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

SECTION 3.15 PUBLIC SERVICES

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

SECTION 3.16 PARKS AND RECREATIONAL FACILITIES

In addition to the general additions and corrections provided above, revise Section 3.15, Parks and Recreational Facilities, as follows:

Page 3.16-16, revise the last paragraph as follows:

Construction of the Chinatown/State Park Station would temporarily fence off portions of the park, generate dust and noise, and introduce heavy construction equipment into the area, which may potentially discourage people from using certain portions of the park, disrupt events occurring at the park, or increase the use of the open portions of the park. The proposed Project does not propose to demolish, nor does it need to demolish the Cargo Snack Shack concession or restrooms during construction; however, the Project Sponsor would coordinate with State Parks and the concessionaire on the potential to provide alternative seating locations during construction. In addition, during one of the final phases of construction, the overhead ropeway cables of the ART system would be installed, which would require a brief and temporary closure of the southernmost corner and western edge of the Los Angeles State Historic Park beneath the cables for safety purposes. However, other options for pedestrian access, including the provision of pedestrian detours during construction, would allow for continued pedestrian access within the Project area. In the location of the Chinatown/State Park Station, a covered pedestrian sidewalk on the roadway would be provided to maintain pedestrian access during all phases of construction, with the exception of 10 nonconsecutive days of asphalt/restripping that would occur on the existing southbound parking lane. In addition, the eastern sidewalk on Spring Street would remain open for pedestrian access at all times.

Page 3.16-26, revise the second sentence of the second paragraph as follows:

As described in PR-1, construction of the Chinatown/State Park Station would require the temporary closure of approximately 22 acres of the southern entrance to Los Angeles State Historic Park and the southernmost corner and western edge of the park during cable installation.

Page 3.16-21, revise the third paragraph as follows:

The proposed Project would include a ~~potential~~ mobility hub at Dodger Stadium Station, where passengers would be able to access a suite of first- and last-mile multi-modal options, and connections to Elysian Park and adjacent neighborhoods. The ~~potential~~ mobility hub and connections to Elysian Park and adjacent neighborhoods would have the ~~potential~~ effect of increasing transit accessibility and non-motorized transportation options to Elysian Park as users of the proposed ART system would be able to access the park from the terminus at Dodger Stadium Station. Implementation of the ~~potential~~ mobility hub and connections to Elysian Park and adjacent neighborhoods would support the goal of the Silver Lake-Echo Park-Elysian Park Community Plan to create links for existing residents of the plan area to existing facilities in the City to expand their recreational opportunities. However, the proposed Project would not change the existing use and capacity of Elysian Park as the park is the second largest park in the City of Los Angeles, spanning 575 acres. It is not anticipated that operation of the proposed Project would result in substantial physical deterioration of the Elysian Park by providing access to the park, as the park is underutilized and the proposed Project does not propose housing units that would otherwise increase the population of the area. Instead, the proposed Project would improve the mobility and accessibility for people in the area by providing an ART option, in accordance with several community plans, including the City of Los Angeles General Plan, Silver Lake-Echo Park-Elysian Park Community Plan, and Metro's Transit to Parks Strategic Plan, to increase access to the park. Therefore, the proposed Project would not increase the use of Elysian Park to the extent that substantial physical deterioration of the facility would occur or be accelerated, and the operational impact would be less than significant impacts.

Page 3.16-24, revise the last paragraph as follows:

The Dodger Stadium Station would ~~potentially~~ include a mobility hub where passengers would be able to access a suite of first and last mile multi-modal options, and connections to Elysian Park and adjacent neighborhoods. As described above, the ~~potential~~ mobility hub and connections to Elysian Park and adjacent neighborhoods would have the beneficial effect of increasing transit accessibility and non-motorized transportation options to Elysian Park as users of the proposed ART system would be able to access the park from the terminus at Dodger Stadium Station. Implementation of the ~~potential~~ mobility hub and connections to Elysian Park and adjacent neighborhoods would support the goal of the Silver Lake-Echo Park-Elysian Park Community Plan to create links for existing residents of the plan area to existing facilities in the City to expand their recreational opportunities. However, the proposed Project would not create or expand the existing use and capacity of Dodger Stadium or Elysian Park. The ~~potential~~ mobility hub and connections to Elysian Park and adjacent neighborhoods would be located within the boundaries of Dodger Stadium parking lot. Therefore, operational impacts of Dodger Stadium Station related

to the construction of expansion of recreational facilities which might have an adverse physical effect on the environment would be less than significant.

Page 3.16-29, revise the first full paragraph as follows:

Operation of Dodger Stadium Station would not require the provision of new or physically altered government facilities (i.e., parks), or need for new or physically altered parks. The proposed Project would ~~potentially~~ provide a mobility hub at Dodger Stadium Station, where passengers would be able to access a suite of first- and last-mile multi-modal options, including a bike share program and individual bike lockers, and connections to Elysian Park and adjacent neighborhoods. As such, the proposed project would result in beneficial impacts related to Elysian Park. Elysian Park is located in the Silver Lake-Echo Park-Elysian Park Community Plan Area. One of the goals of the Community Plan is to provide/ensure access to new recreational resources and open space developed throughout the Plan area, including trails and facilities along the Los Angeles River, and new parks. The proposed Project would improve the mobility and accessibility for existing residents and communities in the area by providing direct linkages to major residential, employment, and tourist destinations, such as LAUS, El Pueblo/Olvera Street, Chinatown, Los Angeles State Historic Park, and Dodger Stadium. Therefore, operation of Dodger Stadium Station would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks, need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives, and the impact would be less than significant.

SECTION 3.17 TRANSPORTATION

In addition to the general additions and corrections provided above, revise Section 3.17, Transportation, as follows:

Page 3.17-26, revise the first paragraph as follows:

The proposed Project would provide fixed route transit service to several neighborhoods including Chinatown, Mission Junction, Elysian Park and Solano Canyon, and to destinations around the Los Angeles State Historic Park. Ridership for neighborhood riders was estimated by calculating the working-age people and jobs within a half-mile walking-distance of each proposed station based on a street network analysis. ~~The proposed Project would Sponsor will request a program with the Los Angeles Dodgers on the potential for the Dodger Stadium Station to~~ include a mobility hub where passengers would be able to access a suite of first and last mile multi-modal options; accordingly, a one-mile biking distance for the Dodger Stadium Station was chosen for the evaluation of the Dodger Stadium Station since the ~~potential~~ mobility hub would facilitate safe and convenient connections to Elysian Park and Solano Canyon, which are beyond a half-mile walking distance. The American Community Survey and the Longitudinal Employer-Household Dynamics of the United States Census was used to calculate the population and jobs respectively within the station catchment areas.

Page 3.17-39, revise the first paragraph as follows:

Less than Significant Impact with Mitigation. Per the City of Los Angeles TAG, construction impacts are not considered to be part of the CEQA analysis, and so are included for informational purposes. Nonetheless, Project construction would introduce lane closures and closed worksites within City streets for construction activities, such as foundations and steel erection. Construction worksites would be fenced, and lane closures and associated lane tapers, temporary advance warning signs, detour signs, etc., would be implemented in accordance with the California MUTCD and LADOT requirements to ensure that no significant temporary geometric design hazards are introduced during the construction period after mitigation. Construction of the proposed Project would not substantially increase hazards due to a geometric design feature or incompatible use with implementation of Mitigation Measure TRA-B, as presented in Section 3.17.56, Mitigation Measures, below. As these features are constructed, Mitigation Measure TRA-A, as presented in Section 3.17.56, Mitigation Measures, below would be implemented concurrently to ensure that these impacts would be less than significant during construction.

Page 3.17-40, revise the first paragraph as follows:

No pedestrian crossings would occur across City streets via this connection. One driveway crossing would be along this pedestrian connection. Enhancements to this driveway crossing are detailed under Mitigation Measure TRA-A, as presented in Section 3.17.56, Mitigation Measures, below. Therefore, the proposed Project would not hinder pedestrian access or crossings. In order to provide additional environmental benefits and as a best practice to further enhance pedestrian visibility, the proposed Project would also incorporate TRA-PDF-A, which would stripe a high visibility crosswalk and provide upgraded lighting for the driveway crossing south of the Los Angeles State Historic Park.

Page 3.17-41, revise the fourth paragraph as follows:

Implementation of the visibility enhancements described under Mitigation Measure TRA-A, as presented in Section 3.17.56, Mitigation Measures, below, primarily by implementing westbound no right turn on red restrictions would alleviate potential visibility issues associated with operation of the Alameda Tower by prohibiting vehicles from making a ~~westbound~~ right turn on red from westbound Alhambra Avenue to northbound Alameda Street. With implementation of Mitigation Measure TRA-A, as presented in Section 3.17.56, Mitigation Measures, below, impacts would be less than significant.

Page 3.17-42, revise the second paragraph as follows,

Because the columns would be set back from the roadway, pedestrians crossing in the crosswalk across the existing driveway immediately south of the Los Angeles State Historic Park would be fully visible to vehicles turning into the existing driveway, and no sight distance obstructions would be present. Vehicles exiting the driveway would have full view of pedestrians crossing without obstructions. Pedestrians who cross outside of the crosswalk to the west of the columns could be obstructed by the columns for motorists travelling southbound on Spring Street making a right turn into the driveway. While there is an existing paved pathway behind the proposed

column locations north of the driveway to access the Los Angeles State Historic Park, south of the driveway is a parking drive aisle of the Capital Milling property. Pedestrians are unlikely to cross in that location, because there would not be a sidewalk to cross onto south of the driveway. However, to further limit the potential for pedestrians to cross behind the columns, implementation of the visibility enhancements described under Mitigation Measure TRA-A, as presented in Section 3.17.56, Mitigation Measures, below, including the implementation of an operational strategy in coordination with State Parks to prevent pedestrians from crossing the driveway west of the columns and channelization of pedestrians to the crosswalk, would alleviate potential visibility issues associated with operation of the Chinatown/State Park Station by preventing pedestrians from crossing behind the columns where they would not be visible to motorists. With implementation of Mitigation Measure TRA-A, impacts would be less than significant. Nevertheless, in order to provide additional environmental benefits and as a best practice to further enhance pedestrian visibility, the proposed Project would incorporate TRA-PDF-A, which would stripe a high visibility crosswalk and provide upgraded lighting for the driveway crossing south of the Los Angeles State Historic Park.

Page 3.17-43, revise the last paragraph as follows:

The section above details the Project components and their potential to affect vehicle, pedestrian, and bicycle visibility, which is the primary way that the Project could negatively impact transportation conditions. Though as detailed above, visibility enhancements have been proposed under Mitigation Measure TRA-A, as presented in Section 3.17.56, Mitigation Measures, below, at the Alameda Tower and Chinatown/State Park Station to reduce the potential for impact to less than significant.

Page 3.17-44, revise the first sentence of the fifth paragraph as follows:

The proposed Project's junction and towers would not introduce any unsafe physical conditions with the implementation of Mitigation Measure TRA-A, as presented in Section 3.17.56, Mitigation Measures, below, which would be implemented at the Alameda Tower and the Chinatown/State Park Station.

Page 3.17-58, revise the last sentence of the fourth paragraph as follows:

Nonetheless, implementation of a Construction Traffic Management Plan, as outlined in Mitigation Measure TRA-B, as presented in Section 3.17.56, Mitigation Measures, below, would be required to ensure adequate emergency access is maintained in and around the Project alignment and component sites throughout all construction activities to ensure that the impact is less than significant with mitigation incorporated.

Page 3.17-66, revise the seventh paragraph as follows:

Implementation of Mitigation Measure TRA-C, as presented in Section 3.17.56, Mitigation Measures, below, includes the identification of temporary disaster routes during construction and other traffic handling measures during a disaster, would be required. With implementation of Mitigation Measures TRA-B and TRA-C, as presented in Section 3.17.56, Mitigation Measures, below, construction impacts would be less than significant.

Page 3.17-67, revise sections 3.17.5 and 3.17.6 as follows:

3.17.5 Project Design Feature

TRA-PDF-A Additional Visibility Enhancements: Subject to the approval of the Los Angeles Department of Transportation, as a best practice to further enhance pedestrian visibility at the Chinatown/State Park Station, stripe a high visibility crosswalk and add upgraded lighting for the driveway crossing south of the Los Angeles State Historic Park.

3.17.56 Mitigation Measures

MM TRA-A **Visibility Enhancements:** Prior to the completion of construction of the proposed Project, and in coordination with and subject to the approval of LADOT, the Project Sponsor shall design the following visibility enhancements at for the following locations sufficient to alert drivers to the presence of pedestrians:

- Alameda Tower – Implement a no right turn on red restriction to prohibit vehicles from making a right turn on red from westbound Alhambra Avenue to northbound Alameda Street.
- Chinatown/State Park Station – Implement an operational strategy or design to channelize pedestrians walking from the Los Angeles State Historic Park to the crosswalk across the existing driveway south of the Park to prevent pedestrians from crossing the driveway west of columns supporting the Chinatown/State Park Station to ensure crossings occur in the crosswalk where visibility is sufficient. The ultimate design or operational method of channelization (such as station staff directing pedestrians towards the crosswalk or a physical method such as a gate) would be coordinated with State Parks.

~~Visibility enhancement features could include high visibility crosswalk treatments, advanced crossing warning signs, flashing beacons, upgraded lighting, and new or upgraded traffic controls, such as traffic signals and all-way stops and right turn on red restrictions and channelization of pedestrians to marked crosswalk locations via fencing. The mitigation measure would be implemented during the construction phase and would be completed prior to proposed Project operations.~~

MM TRA-B **Construction Traffic Management Plan:** Prior to the issuance of a building permit for the proposed Project, a detailed Construction Traffic Management Plan (CTMP), including street closure information, detour plans, haul routes, and a staging plan, shall be prepared and submitted to the City for review and approval. The CTMP shall formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The CTMP shall be based on the nature and timing of the specific construction activities at each of the Project construction sites. This coordination

will ensure construction activities of the concurrent related projects and associated hauling activities are managed in collaboration with one another and the proposed Project. The CTMP may be updated as construction progresses to reflect progress at the various Project construction sites. The CTMP will include, but not be limited to, the following elements as appropriate:

- As traffic lane, parking lane, and sidewalk closures are anticipated, worksite traffic control plans, approved by the City of Los Angeles, shall be developed and implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures.
- Visibility to open pedestrian crossings will be maintained, or temporary or permanent measures consistent with Mitigation Measure TRA-A shall be implemented if determined to be appropriate in coordination with LADOT. In absence of measures to mitigate or eliminate visual obstructions for pedestrians crossing the street, pedestrian crossings may be closed or relocated to more visible locations.
- Existing school crossings, as denoted by yellow crosswalk striping consistent with the Manual on Uniform Traffic Control Devices (MUTCD) along proposed detour routes shall be evaluated in coordination with LADOT to determine if crossing guards should temporarily be assigned. If it is determined that crossing guards should be assigned, on days/times when detours are active, the proposed Project shall fund crossing guards during morning school arrival and afternoon school departure periods during periods when adjacent schools are in session. If school crossings along detour routes are unsignalized, temporary traffic signals will be evaluated in coordination with LADOT and would be implemented by the proposed Project if deemed necessary.
- As partial and full street closures are anticipated at various locations during portions of the Project construction, detour plans, approved by the City of Los Angeles, shall be developed and implemented to route vehicular traffic and bicyclists to alternative routes during these periods.
- Ensure that access will remain accessible for land uses in proximity to the Project alignment and component sites during project construction. In some cases, alternative access locations would be provided or supervised temporary access through the worksite would be accommodated during construction phases where access is hindered, such as foundation construction.
- Coordinate with the City and emergency service providers to ensure emergency access is provided to the Project alignment and component sites and neighboring businesses and residences. Emergency access points will be marked accordingly in consultation with LAFD, as necessary.

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

Page 3.17-69, revise section 3.17.6 as follows:

3.17.6~~7~~ Level of Significance After Mitigation

SECTION 3.18 TRIBAL CULTURAL RESOURCES

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

SECTION 3.19 UTILITIES AND SERVICE SYSTEMS

In addition to the general additions and corrections provided above, revise Section 3.19, Utilities and Service Systems, as follows:

Page 3.19-21, revise the fifth paragraph as follows:

Additionally, operation of the proposed Project would require connections to the LADWP power grid through installation of permanent, underground power lines to connect conduit from the proposed Project to existing underground electrical vaults in order to operate the gondola system and the non-gondola system components (i.e., lights, ventilation, escalators, elevators). It is estimated that the Aerial Rapid Transit (ART) system would require a total estimated power requirement of approximately 2.5 MW to operate the entire gondola system and other station functions such as elevators, escalators, and heating, ventilation, and air conditioning system. The electrical power for the operation of the proposed Project would be supplied by the LADWP through the utility's Green Power Program, as described in GHG-PDF-A in Section 3.8, Greenhouse Gas Emissions. Accordingly, the primary electricity usage associated with the Project would come

from renewable resources, and it is anticipated that the existing power supply provided for the proposed Project would be sufficient for Project operation. Therefore, it is not anticipated that operation of the proposed Project would result in the construction of new or expanded electric power facilities. For a detailed description of energy demand and conservation, refer to Section 3.6, Energy of this Draft EIR.

SECTION 3.20 WILDFIRE

In addition to the general corrections and additions provided above, revise Section 3.20, Wildfire, as follows:

Page 3.20-30, revise the last full paragraph as follows:

It is noted that the proposed Project would implement Mitigation Measure TRA-3C, requiring the development of a Project-specific temporary disaster route plan prior to the start of construction, as described in Section 3.17, Transportation, which would further support coordination with local authorities during an emergency event. The temporary disaster route plan would require coordination with and approval of the plan by LADOT, which would include street closure information and detour plans. In addition to detours, the temporary disaster route plan could also include temporary operational measures that would be implemented by the City during a disaster, including temporary contra-flow lanes or reversing directions to flush vehicles during a disaster situation.

SECTION 4.0 ALTERNATIVES

In addition to the general additions and corrections provided above, revise Section 4.0, Alternatives, as follows:

Page 4-1, revise Section 4.1.1, Project Impacts, as follows:

Based on the environmental analysis conducted for the proposed Project, significant impacts requiring mitigation have been identified for:

- Section 3.4, Biological Resources
- Section 3.5, Cultural Resources
- Section 3.7, Geology and Soils
- Section 3.9, Hazards and Hazardous Materials
- Section 3.11, Land Use and Planning
- Section 3.13, Noise
- Section 3.15, Public Services
- Section 3.17, Transportation
- Section 3.18, Tribal Cultural Resources
- Section 3.19, Utilities and Service Systems
- ~~Section 3.20, Wildfire~~

The Draft EIR identifies less than significant impacts for:

- Section 3.1, Aesthetics
- Section 3.2, Agriculture and Forestry Resources

- Section 3.3, Air Quality
- Section 3.6, Energy
- Section 3.8, Greenhouse Gas Emissions
- Section 3.10, Hydrology and Water Quality
- Section 3.14, Population and Housing
- Section 3.16, Parks and Recreation
- Section 3.20, Wildfire

Page 4-6, revise the second paragraph as follows:

4.1.3.5 Objective 5: Reduce Transportation Related Pollution and GHG Emissions

The proposed Project and Spring Street Alignment Alternative would meet this objective by providing an ART system that would provide safe, zero emission, and high-capacity transit connectivity. Current vehicular emissions associated with events at Dodger Stadium result from passengers in vehicles traveling to the game along with employees (i.e., total Vehicle Miles Traveled (VMT)). By transitioning the passengers of these vehicles to the proposed Project or Spring Street Alignment Alternative, total VMT would be reduced along with corresponding reductions in transportation related pollution and GHG emissions as a result of reduced vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The TSM Alternative would moderately meet this objective, because while more passengers would transition from private vehicles to DSE buses, which could potentially be electrified in the future, the TSM Alternative would still operate vehicles on the roadway, thereby contributing to VMT and some congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The No Project Alternative would not meet this objective, as it would not reduce vehicular congestion that would result in a reduction in transportation related pollution and GHG emissions.

Page 4-8, revise the first full paragraph as follows:

4.1.3.12 Objective 12: Provide a Sustainable Form of Transit

The proposed Project and Spring Street Alignment Alternative would meet this objective by providing a sustainable ART system that would provide safe, zero emission, and high-capacity transit connectivity. Both the proposed Project and Spring Street Alignment Alternative would obtain power through renewable electricity, and as such, GHG emissions associated with electricity usage for gondola operations would be zero. The TSM Alternative and No Project Alternative would not meet this objective at this time, as neither alternative would provide a sustainable form of transit by operating the ART system with the use of zero emission electricity with battery storage backup in order to reduce GHG emissions and improve air quality. With respect to the TSM Alternative, while Metro has made significant progress in transitioning to a zero-emission bus service, an April 20, 2023 Metro report extended the deadline for transitioning the Metro bus fleet to zero-emission buses from 2030 to 2035, indicating that Metro would not be able to operate the TSM Alternative with zero-emission buses by the proposed Project's projected opening year. Further, unlike the proposed Project, which has committed to purchase

the power required for operations from the LADWP Green Power Program pursuant to GHG-PDF-A, Metro has not proposed obtaining the electricity for its electric buses from green sources.

Page 4-18, add the following new Section 4.2.1.2:

Pedestrian Enhancement Alternative

Under the Pedestrian Enhancement Alternative, the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. This alternative would use the existing pedestrian path between the Metro L Line (Gold) Station and Dodger Stadium along College Street to Yale Street and over the existing pedestrian bridge across State Route 110 (SR-110) to Stadium Way. It would then travel along Stadium Way and the Dodger Stadium driveway to the Downtown Gate E, before crossing the Dodger Stadium parking areas to reach the Stadium. Along the Dodger Stadium driveway to Downtown Gate E, the existing pedestrian pathway is located in a striped shoulder, and no raised sidewalks are provided.

The walking distance between the Metro L Line (Gold) Station and where riders would exit the Dodger Stadium Station is approximately one mile. The Metro L Line (Gold) Station was selected for this analysis because it is the closest rail station to Dodger Stadium with an estimated walk time of 25 minutes, based on the typical 3.5 feet per second walk time that is used in the California Manual of Uniform Traffic Control Devices (CA MUTCD) for estimating crossing distances. The walk time would likely exceed a 25 minute walk time because it does not take into account pedestrian delay at intersections, crowded walking conditions, slower walk times due to the elevation change, or the walk time up and down the helix ramp to enter and exit the existing pedestrian bridge over the SR-110.

The elevation change of the existing pedestrian path from the Metro L Line (Gold) Station to Dodger Stadium is approximately 215 feet (300 foot elevation above sea level at the Metro L Line (Gold) Station entrance and 515 foot elevation at Dodger Stadium Station).¹⁴ The steepest portion of the existing pedestrian path runs from approximately the intersection of Lookout Drive and Stadium Way (approximately 400 foot elevation) to the location of the Dodger Stadium Station, an elevation change of approximately 115 feet over an approximately 2,200 foot walking distance, or an average of a five percent slope. This slope, on average, is at the upper end of the acceptable slope to comply with Americans with Disabilities Act (“ADA”) Accessibility Guidelines, and several sections of the existing pedestrian pathway likely exceed the five percent maximum longitudinal slope requirements under ADA Accessibility Guidelines, which would require the construction of zig zags, and/or the construction of landings, in order to maintain an acceptable slope in compliance with ADA Accessibility Guidelines, which could further increase the walking distance and estimated walk time from the Metro L Line (Gold) Station and Dodger Stadium.

For the portion of the existing pedestrian path between the Metro L Line (Gold) Station and the entrance to Dodger Stadium at the entrance to the Dodger Stadium driveway to Downtown Gate E at Stadium Way, the existing sidewalks on City streets have limited opportunities for widening, as they front existing homes, apartments and businesses. This alternative would include striped

pedestrian crossings with high visibility crosswalks, with MUTCD compliant pedestrian phases, and wayfinding to direct Dodger game and event attendees. Traffic control officers (TCOs) may also be needed to manage pedestrian crossings with large crowds to ensure safety and balance pedestrian and vehicle flow.

Along the Dodger Stadium driveway to Downtown Gate E, this alternative would provide covered vertical circulation/pathways inclusive of sidewalks, and a minimum of three escalators (two to operate in the peak direction) along the Dodger Stadium driveway to Downtown Gate E (approximately 1,600 feet in elevation). As a comparison, this is approximately twice the length of and 30 percent greater elevation gain at the Universal Studios Hollywood Starway, which connects the upper and lower lots of the theme park, over an approximately 170 foot elevation change (600 foot elevation at base of Starway, 770 foot elevation at top of Starway).¹⁵ The Universal Studios Hollywood Starway takes approximately six to seven minutes to traverse the four sets of escalators and landings/walkways in between, so the vertical circulation elements of the Pedestrian Enhancement Alternative could take longer based on it being twice the length of and greater elevation gain than the Starway. Construction of this facility would occur either by removing portions of the embankment along the western edge of the driveway, which would require substantial retaining walls, or removal of vehicle lanes from the Dodger Stadium driveway to Downtown Gate E, which would increase vehicle congestion and queueing.

The Pedestrian Enhancement Alternative was dismissed from further detailed consideration due to the inability to meet most of the proposed Project's objectives. While this alternative would provide improved pedestrian connections compared with existing conditions, the 25 minute plus travel time from the Metro L Line (Gold) Station to the location of the proposed Dodger Stadium Station under this alternative would be nearly nine times that of the proposed Project travel time of three minutes between these two locations, and would involve substantial physical exertion, even with the proposed vertical circulation enhancements. Given these limitations, this alternative is unlikely to attract substantially more people to walk to Dodger Stadium compared to existing conditions. The typical distance assumed for walking access to a transit station is a half mile, and much beyond this distance fewer people are willing to walk, and the VMT reduction benefit of transit is diminished. The Pedestrian Enhancement Alternative walking distance would be approximately one mile - twice this distance. Thus, this alternative is unlikely to generate anywhere close to the usage expected by the proposed Project which, given the capacity of the proposed Project, could carry approximately 20 percent of Dodgers fans to Metro's regional transit system.

Due to these limitations, this alternative did not meet the proposed Project's objectives to expand mobility options for transit riders, attract new riders to the Metro system, enhance community connectivity by providing first/last mile transit and pedestrian access to areas that have historically been underserved, including the Los Angeles State Historic Park and Elysian Park, increase connectivity to the region's public transportation hub at LAUS and the Dodger Stadium property, or to improve the Dodger Stadium visitor experience by providing efficient, high-capacity and faster alternative access to Dodger Stadium, to the same extent as the proposed Project. This alternative would not provide the proposed Project's pedestrian improvements

between Metro's L Line (Gold) Station and the entrance to the Los Angeles State Historic Park, which is provided primarily for passengers transferring between the Metro L Line (Gold) and the proposed Project. In comparison, the Chinatown/State Park Station enhances transit access to surrounding communities, including the Los Angeles State Historic Park, Chinatown, Mission Junction including William Mead Homes, Los Angeles River, and North Broadway. Chinatown/State Park Station also provides the community benefit of Park amenities, including approximately 740 square feet of concessions, 770 square feet of restrooms, and a 220 square foot covered breezeway connecting the concessions and restrooms. Additionally, Chinatown/State Park Station would include a mobility hub where passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program. Pedestrian access enhancements could include pedestrian improvements between Metro's L Line (Gold) Station and Chinatown/State Park Station consistent with the Connect US Action Plan, including hardscape and landscape improvements, shade structures, and potential seating, as well as support for the future Los Angeles State Historic Park bike and pedestrian bridge. Overall, the community benefits listed above would not be constructed under this Pedestrian Enhancement Alternative.

In addition, because this alternative would not reduce VMT to the same extent as the proposed Project, this alternative would not meet the objective to reduce vehicular congestion in and around Dodger Stadium, and on neighborhood streets, arterial roadways, and freeways during game and special event days to the same extent as the proposed Project. And, if vehicle lanes were removed from the Dodger Stadium driveway to accommodate this alternative, this could increase vehicle congestion and queueing.

Accordingly, this alternative was ultimately dismissed from further analysis in the Final EIR because it would not meet most of the project objectives to the same degree as the proposed Project.

While the Pedestrian Enhancement Alternative has been considered but dismissed from further detailed analysis because it does not meet most of the basic project objectives, the proposed Project includes substantial pedestrian enhancements along the proposed Project alignment. The proposed Alameda Station would provide pedestrian access to the planned LAUS Forecourt and El Pueblo. Vertical circulation elements (i.e., elevators, escalators, stairs) for pedestrian access on the west would be introduced at-grade north of the Placita de Dolores in a proposed new pedestrian plaza at El Pueblo in an area currently used as a parking and loading area for El Pueblo. Implementation of Alameda Tower would include reuse and integration of the existing pavers located at the Alameda Triangle, as well as landscape and hardscape updates to the Alameda Triangle. Alpine Tower would also include the installation of landscaping and hardscaping near the base of the tower. To facilitate transportation connectivity, the proposed Project would include pedestrian access enhancements including pedestrian improvements between Metro's L Line (Gold) Station and Chinatown/State Park Station consistent with the Connect US Action Plan, shade structure, and potential seating. Chinatown/State Park Station would also include Park amenities, including approximately 740 square feet of concessions, 770 square feet of restrooms, and a 220 square foot covered breezeway connecting the concessions and restrooms.

Additionally, Chinatown/State Park Station would include a mobility hub where passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program. The proposed Project would also provide support for the future Los Angeles State Historic Park bike and pedestrian bridge. Dodger Stadium Station would include a pedestrian connection to Dodger Stadium, including hardscape and landscape improvements and potential seating. The proposed Project would also provide a mobility hub at Dodger Stadium Station where outside of game day periods, passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon.

Footnote 14: Elevations obtained from topographic-map.com. <https://en-gb.topographic-map.com/map-s4hdn/LosAngeles/?center=34.13912%2C-118.35473&zoom=16&popup=34.13943%2C-118.35413>, accessed August 24, 2023.

Footnote 15: *Policy Brief on the Impacts of Transit Access (Distance to Transit) Based on a Review of the Empirical Literature*, Handy & Boarnet, 2013 https://ww2.arb.ca.gov/sites/default/files/2020-06/Impacts_of_Transit_Access_%28Distance_to_Transit%29_Based_on_a_Review_of_the_Empirical_Literature_Policy_Brief.pdf, accessed August 24, 2023.

Page 4-44, revise the last paragraph as follows:

The Spring Street Alignment Alternative would also have similar operational energy demands, renewable power commitments as outlined in GHG-PDF-A, and battery back-up as the proposed Project. In addition, the net reduction in criteria pollutant emissions due to the anticipated decrease in the number of people traveling to Dodger Stadium (and the surrounding area) in passenger vehicles and increase in number of people using public transit would remain the same. As such, the Spring Street Alignment Alternative would not result in an exceedance of the SCAQMD operational maximum daily emissions significance thresholds and would be consistent with the SCAQMD's Air Quality Management Plan. As such, impacts related to air quality under the Spring Street Alignment Alternative would be less than significant. Therefore, impacts related to air quality resources under the Spring Street Alignment Alternative would be similar to the less than significant impacts of the proposed Project.

Page 4-45, revise the second and third paragraphs as follows:

Due to the fully urbanized character of the surrounding area, there are no riparian habitats or wetlands within the BSA or adjacent to the State Historic Park Station. In addition, there are currently no active rare, endangered, or threatened habitats listed by the CDFW or the USFWS, or Habitat Conservation Plans or Natural Community Conservation Plans within the BSA or adjacent to the State Historic Park Station. The removal of certain of the trees for the proposed Project would result in a small reduction of habitat for wildlife species that depend on trees for cover, nesting, roosting, foraging, and other reasons. However, the quality of wildlife habitat provided by the trees proposed for removal is relatively low, given that the trees are primarily non-native tree species. In the short-term, the removal of trees will result in a marginal reduction of suitable tree habitat for nesting birds, roosting bats, and other wildlife in the vicinity of the

proposed Project. Common wildlife species would be expected to utilize adjacent habitats, and substantial population level impacts to common species would not be expected due to the small amount of habitat loss relative to the amount of habitat available in surrounding areas. In the long-term, tree replacement of those removed would more than offset any realized impacts associated with the Project.

Page 4-46, revise the first paragraph as follows:

... biological resources under the Spring Street Alignment Alternative would be similar to the less than significant impacts of the proposed Project with mitigation. In addition, the Spring Street Alignment Alternative would also implement BIO-PDF-A through BIO-PDF-F in order to provide additional environmental benefits related to biological resources.

Page 4-47, revise the second full paragraph as follows:

The operational energy usage of the Spring Street Alignment Alternative would also have similar operational energy demands, renewable power commitments (as outlined in GHG-PDF-A), and battery back-up as the proposed Project. In addition, the net reduction in fuel use due to the anticipated decrease in the number of people traveling to Dodger Stadium (and the surrounding area) in passenger vehicles and increase in number of people using public transit would remain the same. As with the proposed Project, the Spring Street Alignment Alternative's operational energy usage would represent a very small demand on regional energy supplies and would not require the development of additional energy capacity.

Page 4-49, revise the first paragraph as follows:

Similar to the proposed Project, the Spring Street Alignment Alternative would result in a net decrease in GHG emissions compared to existing conditions, albeit a slightly smaller net reduction than the proposed Project. The Spring Street Alignment Alternative would have similar operational energy demands, green power commitments (as outlined in GHG-PDF-A), and battery back-up as the proposed Project. In addition, the net reduction in greenhouse gas emissions due to the anticipated decrease in the number of people traveling to Dodger Stadium (and the surrounding area) in passenger vehicles and increase in number of people using public transit would remain the same.

Page 4-49, revise the third paragraph as follows:

Hazards and Hazardous Materials

The Spring Street Alignment Alternative would result in development of an ART system; therefore, the Spring Street Alignment Alternative has the potential to increase or change exposure to hazards and hazardous materials. Similar to the proposed Project, during construction activities for the stations, junction, and towers, it is anticipated that limited amounts of hazardous substances, such as solvents, paints, oils, hydraulic fluids, gasoline, diesel fuel, etc. would be transported to and used at the component sites throughout the duration of construction. In order to obtain permits required to commence construction, the Spring Street Alignment Alternative would comply with all applicable local, state and federal regulations. These regulations identify

safety standards and procedures related to the removal, handling, storage, transport, use, and disposal of hazardous materials and require testing, abatement, and remediation when deemed necessary. The Spring Street Alignment Alternative would also implement Mitigation Measure HAZ-A, which requires preparation and submittal to the Los Angeles Department of Building and Safety (LADBS) of a Soil and Groundwater Management Plan. Thus, compliance with all applicable regulations and implementation of Mitigation Measure HAZ-A would ensure that future development would not create a significant hazard to the public, schools, or the environment through the transport, use, disposal, or release of hazardous materials. However, unlike the proposed Project, the Spring Street Alignment Alternative would not require demolition of the existing building at 1201 North Broadway and no mitigation would be required to reduce impacts from hazards or hazardous materials within the 1201 North Broadway building.

Page 4-52, revise the last paragraph as follows:

Implementation of Mitigation Measure TRA-B, WFR-PDF-A, and compliance with applicable State and local regulations, including coordination with LAFD, LAPD, and State Parks prior to construction, would ensure that the Spring Street Alignment Alternative would not create additional demand for LAFD, LAPD, or State Parks services during construction. In addition, with adherence to the applicable regulations, coordination with LAFD, LAPD, and State Parks, and implementation of an Emergency Operations Plan, which would be reviewed prior to the issuance of a building permit, operation of the proposed Project would not create additional demand for LAFD or LAPD services that would result in the need to add new, or physically alter existing fire or police protection facilities.

Page 4-55, revise the second to last paragraph as follows:

Spring Street Junction

Spring Street Junction under the Spring Street Alignment Alternative would be placed in a similar location to Chinatown/State Park Station under the proposed Project. Because the evaluation of the potential to increase geometric hazards is primarily focused on sight visibility for pedestrians and motorists related to the columns, the conclusions for Spring Street Junction under the Alternative are consistent with the conclusions for Chinatown/State Park Station under the proposed Project. This includes the implementation of the visibility enhancements described under Mitigation Measure TRA-A for the Chinatown/State Park Station, including the implementation of an operational strategy in coordination with State Parks to prevent pedestrians from crossing the driveway west of the columns and channelization of pedestrians to the crosswalk, which would alleviate potential visibility issues associated with operation of the Spring Street Junction. With implementation of Mitigation Measure TRA-A, impacts would be less than significant. Nevertheless, to provide additional environmental benefits and as a best practice to further enhance pedestrian visibility, the Alternative would also incorporate TRA-PDF-A, which would stripe a high visibility crosswalk and provide upgraded lighting for the driveway crossing south of the Los Angeles State Historic Park.

Page 4-56, revise the first paragraph as follows:

...crossing for pedestrians. Traffic signals are located well beyond the 250 feet required for vertical sight distance, so there is no anticipated vertical sight distance issue related to traffic signals. Vehicles traveling northbound would have a clear line of sight for pedestrians crossing at this intersection, and therefore no sight distance issues are expected. The intersections of Spring Street at Sotello Street and Spring Street at Mesnagers Street are also beyond 250 feet from the columns for both northbound and southbound vehicles, and so there would be a clear line of sight at these intersections and no sight distance issues are expected. To mitigate the potential for significant visibility impacts associated with pedestrians crossing Spring Street at Ann Street, mitigation would be implemented, including the provision of marked crosswalks at the intersection of Spring Street and Ann Street and the signalization of the intersection of Spring Street and Ann Street in order to mitigate the potential visibility impact associated with pedestrians crossing at this intersection. Mitigation ~~Measure TRA-A~~ would therefore be implemented to alleviate potential visibility issues associated with the operation of State Historic Park Station. With implementation of this ~~M~~mitigation-~~Measure TRA-A~~, impacts would be less than significant.

Page 4-56, revise the second full paragraph as follows:

Accordingly, mitigation is required to ~~Implementation of the visibility enhancements described under Mitigation Measure TRA-A~~ would alleviate visibility issues associated with operation of Bishops Tower under the Spring Street Alignment Alternative. As mitigation, the Spring Street Alignment Alternative would implement a three-way stop sign at the intersection of Bishops Road and Savoy Street. With implementation of this ~~m~~mitigation-~~Measure TRA-A~~, impacts would be less than significant.

Page 4-63, add the following after the third paragraph:

The Metro Board received and filed a board report on April 20, 2023, regarding a staff recommendation to extend the deadline for transitioning the entire bus fleet to zero-emission buses from 2030 to 2035.¹⁶ While Metro has made significant progress in transitioning to a zero-emission bus service, the report recognizes that “the ZEB industry is still evolving and not sufficiently mature to allow for full implementation by 2030 without risk to service. Key issues include cost, grid capacity, performance (reliability, maintainability, and operability), early obsolescence, utility lead times, and supply chain issues.” Further, unlike the proposed Project, which pursuant to GHG-PDF-A, has pledged to purchase power required for operations from the LADWP Green Power Program, Metro has not proposed obtaining the electricity for its electric buses from green sources. The Metro report discusses the potential issues with the electrical grid’s ability to provide the electricity that Metro would require for a full zero-emission bus fleet. Regardless of whether the shuttle buses would be electrified, the operational issues associated with substantially expanding the Dodger Stadium Express discussed above remain. Given that the Metro fleet would not be electrified until well after the proposed Project’s projected opening year, the analysis of the TSM Alternative presumes that the TSM Alternative shuttle buses would not be electric, and would instead operate using natural gas as Metro’s buses currently use.

Footnote 16: <https://datamade-metro-pdf-merger.s3.amazonaws.com/2023-0207.pdf>.

Page 4-65, revise the first and second paragraphs as follows:

However, the increase in emissions under the TSM Alternative would be partially offset by the reduction in VMT due to an increased number of people using public transit to travel to Dodger Stadium instead of private vehicles. Emissions could be further reduced through the use of electric buses for the TSM Alternative. However, the Metro Board received and filed a board report on April 20, 2023, regarding a staff recommendation to extend the deadline for transitioning the entire bus fleet to zero-emission buses from 2030 to 2035.¹⁷ While Metro has made significant progress in transitioning to a zero-emission bus service, the report recognizes that “the ZEB industry is still evolving and not sufficiently mature to allow for full implementation by 2030 without risk to service. Key issues include cost, grid capacity, performance (reliability, maintainability, and operability), early obsolescence, utility lead times, and supply chain issues.” Further, unlike the proposed Project, which has pledged to purchase power required for operations from the LADWP Green Power Program pursuant to GHG-PDF-A, Metro has not proposed obtaining the electricity for its electric buses from green sources. The Metro report discusses the potential issues with the electrical grid’s ability to provide the electricity that Metro would require for a full zero-emission bus fleet.

The proposed Project would also result in a net reduction in criteria pollutant emissions by reducing VMT compared to existing conditions. The TSM Alternative would have higher VMT than the proposed Project, resulting in higher emissions than the proposed Project, even if buses were fully zero-emission, as the TSM Alternative would still result in an increase in bus VMT, with additional buses creating an increase of activity. Because the TSM Alternative involves an increase in emission producing activity over the proposed Project, it would result in increased air quality impacts compared to the proposed Project. The estimated maximum mass daily emissions for the TSM Alternative operations are less than the SCAQMD mass daily significance thresholds for all criteria pollutants. Therefore, impacts related to air quality under the TSM Alternative would be similar to the less than significant impacts of the proposed Project.

Footnote 17: <https://datamade-metro-pdf-merger.s3.amazonaws.com/2023-0207.pdf>.

Page 4-66, revise the first paragraph as follows:

Energy

The TSM Alternative would not result in development of an ART system; however, the TSM Alternative would involve relocating operations from the Union Station/Metro Gateway property to Division 13, longer loading zones at Dodger Stadium, and dedicated routes into and around the Dodger Stadium, which may require substantive modification to the parking lots. As such, the TSM Alternative would result in a change to current activities on the proposed Project site. In order to accommodate service frequencies of 47 seconds, a minimum of 6 buses loading simultaneously would be required. Because the TSM Alternative would allow for an increased number of people using public transit, associated emissions and fuel use would increase compared to the existing DSE service. However, consumption of energy resources would not be wasteful or inefficient, nor

would the TSM Alternative conflict with energy efficiency plans as the buses used to operate the TSM Alternative would use compressed natural gas. Further, the TSM Alternative buses could be transitioned to electric buses in the future, as Metro considers electrification of its bus fleet by 2035.¹⁸ In addition, compared to the proposed Project, the TSM Alternative's construction phase would be significantly reduced, thus resulting in fewer impacts. Therefore, impacts related to energy under the TSM Alternative would be similar to the less than significant impacts of the proposed Project with mitigation.

However, while operation of the TSM Alternative may result in an increased number of people traveling to Dodger Stadium by public transit, VMT would be higher compared to the proposed Project and associated emissions and fuel use of the additional buses would also result in an increase of energy consumption compared to the proposed Project. Further, even if Metro transitions its bus fleet to electric buses by 2035, after the projected opening year for the proposed Project, the TSM Alternative is unlikely to achieve the same level of ridership as the proposed Project, and therefore would not achieve the same level of emissions and fuel use reductions as the proposed Project. In addition, the TSM Alternative would not benefit from the proposed Project's green power commitments, as even if Metro transitions to electric buses, Metro has not proposed obtaining electricity from electric buses from green sources, and battery back-up system. As such, while the TSM Alternative could result in reduced VMT compared to existing conditions, the VMT reduction would be less than the proposed Project. Therefore, the beneficial improvements associated with the proposed Project would not occur.

Footnote 18: <https://datamade-metro-pdf-merger.s3.amazonaws.com/2023-0207.pdf>.

Page 4-66, revise the last three paragraphs as follows:

Geology and Soils

~~The TSM Alternative would not result in development of an ART system and would involve relocating operations from the Union Station/Metro Gateway property to Division 13, longer loading zones at Dodger Stadium, and dedicated routes into and around the Dodger Stadium, which may require substantive modification to the parking lots. In addition, the TSM Alternative would include additional DSE service trips, which would generate new GHG emissions.~~

~~Because the TSM Alternative involves an increase in a GHG emission producing activity over existing conditions, it could result in GHG emission impacts, and potential impacts regarding conflicts with applicable plans, policies, or regulations adopted for the purpose of reducing GHGs. However, this would be partially offset by the increased number of people using public transit to travel to Dodger Stadium instead of private vehicles, and impacts to GHG emissions would be less than significant. Therefore, impacts related to GHG emissions under the TSM Alternative would be higher than but similar to the less than significant impacts of the proposed Project.~~

~~However, compared to the proposed Project, the number of people traveling to Dodger Stadium and using public transit would be similar, but they would be traveling on DSE bus routes as opposed to the aerial tramway, and would not reduce associated GHG emissions and fuel use to~~

~~the same extent as the proposed Project. Therefore, not all of the beneficial GHG reductions associated with the proposed Project would occur.~~

The TSM Alternative would not result in development of an ART system; however, the TSM Alternative would involve relocating operations from the Union Station/Metro Gateway property to Division 13, longer loading zones at Dodger Stadium, and dedicated routes into and around the Dodger Stadium, which may require modification to the parking lots. Overall, the TSM Alternative would not increase or change exposure to existing environmental conditions, such as fault rupture, seismic shaking, liquefaction, or other geologic hazards. Because the TSM Alternative would not require any new development, excavation activity, or exposure of soils, it would not change the existing exposure to geologic conditions or have an impact on paleontological resources. In addition, the TSM Alternative would not include any new development that would expose more people or structures to geologic hazards, such as expansive soils. As such, although the proposed Project impacts would be less than significant with mitigation, the TSM Alternative would result in less than significant impacts related to geology and soils. Therefore, impacts related to geology and soils under the TSM Alternative would be less than the less than significant impacts of the proposed Project with mitigation.

Page 4-67, revise the first three paragraphs as follows:

Greenhouse Gas Emissions

The TSM Alternative would not result in development of an ART system; however, the TSM Alternative would result in new development that would require relocating from the LAUS to Metro Division 13, larger loading zones at Dodger Stadium, and dedicated routes between LAUS and into and around the Dodger Stadium, which may require modification to the Dodger Stadium parking lots, to increase the capacity of the Union Station DSE. In addition, the TSM Alternative would include additional DSE service trips, which would generate new GHG emissions.

Because the TSM Alternative involves an increase in a GHG emission producing activity over existing conditions, it could result in GHG emission impacts, and potential impacts regarding conflicts with applicable plans, policies, or regulations adopted for the purpose of reducing GHGs. However, this would be partially offset by the increased number of people using public transit to travel to Dodger Stadium instead of private vehicles, and impacts to GHG emissions would be less than significant. Therefore, impacts related to GHG emissions under the TSM Alternative would be similar to the less than significant impacts of the proposed Project.

However, compared the proposed Project, the number of people traveling to Dodger Stadium and using public transit would be similar, but they would be traveling on DSE bus routes as opposed to the ~~aerial tramway~~ ART system, and would not reduce associated GHG emissions and fuel use to the extent of the proposed Project, although fuel use may be reduced in the future as Metro electrifies its bus fleet by 2035. As such, GHG emissions and fuel use would not be reduced, and fuel use would not be reduced upon initial operations, and could only be reduced in the future if Metro electrifies its bus fleet. Therefore, the beneficial improvements associated with the proposed Project would not occur.

Page 4-73, revise the fourth paragraph as follows:

Utilities and Service Systems

The TSM Alternative would not result in development of an ART system; however, the TSM Alternative would result in new development that would require relocating from the LAUS to Metro Division 13, larger loading zones at Dodger Stadium, and dedicated routes between LAUS and into and around the Dodger Stadium, which may require modification to the Dodger Stadium parking lots, to increase the capacity of the Union Station DSE. Overall, under the TSM Alternative, the existing onsite water and sewer systems would continue to be used, and no new connections to existing utilities systems would be required. No additional demand for regional water supplies would occur, and no additional wastewater would be conveyed to the wastewater treatment facility. In addition, no additional drainage infrastructure would be developed by the TSM Alternative, and runoff in the proposed Project area would remain in its current condition and no storm water system improvements would be required. Further, solid waste generation would remain the same as the existing condition and increases in needs for landfill capacity would not occur with the TSM Alternative. As such, although the proposed Project impacts would be less than significant with mitigation, the TSM Alternative would result in no impact to utilities and service systems. Therefore, impacts to utilities and service systems under the TSM Alternative would be reduced compared to the less than significant impacts of the proposed Project.

To the extent that the TSM Alternative transitions to electric buses along with Metro’s bus fleet, the April 20, 2023 Metro Board report recognized that there may be potential issues with the electrical grid’s ability to provide the electricity that Metro would require for a full zero-emission bus fleet. Accordingly, should the TSM Alternative use electric buses, there may be additional utility impacts associated with the transition. Metro’s projected timeline for electrification of the bus fleet would occur after the proposed Project’s potential opening year, and therefore this analysis assumes the initial operational conditions.

SECTION 5.0 OTHER CEQA CONSIDERATIONS

In addition to the general additions and corrections provided above, revise Section 5.0, Other CEQA Considerations, as follows:

Page 5-14, revise the first paragraph as follows:

Due to its urbanized and developed nature, the Biological Survey Area (BSA) provides little opportunity for wildlife species or other biological resources to exist. No native plant communities occur within or adjacent to the BSA. There are no wildlife corridors within the BSA to support movement of wildlife species. There are no sensitive natural communities such as wetlands, oak woodlands, or coastal sage scrub habitat within the BSA. There are no Habitat Conservation Plans that overlap with the BSA, and the nearest Significant Ecological Area is located approximately five miles north-northwest of Dodger Stadium at Griffith Park. While construction of the proposed Project would result in the removal of trees, as detailed in Table 3.4 1, their removal and replacement would be subject to the City’s Native Tree Protection Ordinance, the City of Los Angeles Urban Forestry Division, and a special permit from the California Department of Parks

and Recreation. Additionally, the proposed Project would implement standard best management practices and mitigation measures related to the control of fugitive dust, noise, and vibration, including compliance with SCAQMD Rule 403, Mitigation Measures NOI-A and NOI-B, and compliance with the Migratory Bird Treaty Act to minimize impacts to roosting bats and nesting birds. Therefore, the proposed Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and impacts would be less than significant. In addition, the proposed Project would implement BIO-PDF-A to provide additional environmental benefits regarding biological resources, and following consultation with CDFW, additional Project Design Features were incorporated to provide additional environmental benefits regarding biological resources, BIO-PDF-B, BIO-PDF-C, BIO-PDF-D, BIO-PDF-E, BIO-PDF-F, BIO-PDF-G, and BIO PDF-H.

Page 5-26, revise the second full paragraph as follows:

5.2.8 Greenhouse Gas Emissions

Greenhouse gas (GHG) emissions are regionally cumulative in nature. The analysis of GHG emission impacts under CEQA contained in this Draft EIR effectively constitutes an analysis of the Project's contribution to the cumulative impact of GHG emissions. As discussed in Section 3.7, Greenhouse Gas Emissions, current vehicular emissions are associated with games and events at Dodger Stadium as a result of passengers in vehicles traveling to the Stadium, along with employees (i.e., total VMT). By transitioning a portion of the passengers of these vehicles to the proposed Project, total VMT would be reduced along with corresponding reductions in emissions. During operation, the proposed Project would obtain power through renewable electricity pursuant to GHG-PDF-A, and as such, GHG emissions associated with electricity usage for gondola operations would be zero. Additionally, the proposed Project would feature battery storage in lieu of diesel generators as a backup power supply to allow for unloading of the aerial gondola system in the event of a temporary power grid failure. Ultimately, the proposed Project would reduce GHG emissions compared to the baseline conditions. In addition, the proposed Project would be consistent with applicable plans for the reduction of GHG emissions. Therefore, cumulative impacts with respect to GHG emissions would be less than significant.

Page 5-26, revise the last paragraph as follows:

5.2.9 Hazards and Hazardous Materials

Cumulative hazardous materials effects could occur if the related projects within the City of Los Angeles, when combined with the proposed Project, would have the potential to expose future area residents, employees, and visitors to chemical hazards through redevelopment of sites and structures that may be contaminated from either historic or ongoing uses. The proposed Project and related projects would be required to comply with applicable federal, State, and local regulations that govern hazardous materials during construction. The proposed Project would have the potential to encounter contaminated soils or groundwater during construction. The proposed Project is also located on a site included on a list included on a list of hazardous materials sites. However, Mitigation Measures HAZ-A and HAZ-B described further in Section 3.9, Hazards and Hazardous Materials, include the preparation and submittal to the Los Angeles Department

of Building and Safety (LADBS) of a Soil and Groundwater Management Plan and hazardous materials abatement measures to minimize impacts related to hazards and hazardous materials.

Page 5-28, revise the second paragraph as follows:

The area considered for water quality impacts is the LARWQCB's jurisdiction. The proposed Project and related projects have the potential to generate pollutants during project construction and operation. All construction projects that disturb one acre or more of land would be required to prepare and implement SWPPPs in order to obtain coverage under the Statewide CGP. All projects within the watershed would also be required to prepare and implement LID reports specifying BMPs, that would be applied during project design and project operation to minimize water pollution from project operation. Additionally, as stated in Section 3.9, Hazards and Hazardous Materials, a Soil and Groundwater Management Plan would be prepared, submitted to LADBS, and implemented to specify methods for handling and disposal in the event contaminated groundwater is encountered during construction. The Project Sponsor would prepare and submit an IGP SWPPP, which must be submitted to the SWRCB prior to and adhered to during operations. The IGP SWPPP, which would apply to portions of the proposed Project that include defined industrial activities, such as maintenance and equipment cleaning areas, and the LID Plan would identify the BMPs for Project operations. Therefore, cumulative impacts with respect to water quality would be less than significant.

Page 5-36, revise the first full paragraph as follows:

In the event that proposed Project construction occurs concurrently with related projects in proximity to the Project site, specific coordination among these multiple construction sites would be required and implemented through the proposed Project's Construction Traffic Management Plan, as outlined in Mitigation Measure TRA-B in Section 3.17, Transportation, which would be required to ensure adequate emergency access is maintained on adjacent ROWS_s throughout all construction activities.

Page 5-37, revise the fourth full paragraph as follows:

Construction activities associated with the proposed Project would be short term and would take precautions to minimize security incidents that could result in demand for police protection through fencing and other security barriers. Once operational, the proposed Project would include security features, including lighting, staffing, cameras, and access closures at night; cabins with surveillance, secured windows, and two-way communication to system control rooms; and preparation of an Emergency Operations Plan, which would include emergency response protocols and safety procedures developed in conjunction with the operator, system provider, and local and state authorities (e.g., LAFD, LAPD, and State Parks as applicable). The plan would address operational changes and communications protocols required in response to a range of potential emergencies, such as a medical emergency in a cabin or in a station, or a fire near the alignment. The plan would consider a wide range of scenarios for which default operational responses would be determined. In addition, the plan would include communication protocols with local and state authorities for further instruction and coordination.

Page 5-42, revise the first paragraph as follows:

projects in the vicinity would also be required to analyze and mitigate for transportation-related construction impacts. In addition, in order to provide additional environmental benefits and as a best practice to further enhance pedestrian visibility, the proposed Project would incorporate TRA-PDF-A, which would stripe a high visibility crosswalk and provide upgraded lighting for the driveway crossing south of the Los Angeles State Historic Park.

Page 5-49, revise the last paragraph as follows:

Utilities

The geographic area considered for the analysis of cumulative impacts pertaining to public services is the urbanized and developed City of Los Angeles. Implementation of the proposed Project in conjunction with the related projects would increase the demand for electricity. For the City of Los Angeles, LADWP is the sole supplier of electricity to businesses and residents of the area. It is estimated that the ART system would require a total estimated power requirement of approximately 2.5 megawatts to operate the entire gondola system and other station functions such as elevators, escalators, and heating, ventilation, and air conditioning system. The electrical power for the operation of the proposed Project would be supplied by LADWP through the utility's Green Power Program, pursuant to GHG-PDF-A. Accordingly, the primary electricity usage associated with the proposed Project would come from renewable resources, and it is anticipated that the existing power supply provided for the proposed Project would be sufficient for Project operation. It was determined in Section 3.6, Energy, and Section 3.19, Utilities and Service Systems, that implementation of the proposed Project would ~~would~~ not have a substantial effect on State-wide or regional energy resources.

Page 5-53, revise the last paragraph as follows:

The electrical power for Project operations of the aerial gondola system and associated stations, junction, and towers would be supplied by LADWP through the utility's Green Power Program, pursuant to GHG-PDF-A. Accordingly, the primary electricity usage associated with the proposed Project would come from renewable resources.

Page 5-55, revise the first paragraph as follows:

The proposed Project would implement Mitigation Measure HAZ-A to prepare and submit to LADBS a sSoil and gGroundwater mManagement pPlan, which shall include sampling and analyzing soils/groundwater and required methods and procedures for the proper handling and removal of impacted soils and/or groundwater for off-site disposal, to reduce impacts related to construction to less than significant.

Page 5-55, revise the fourth paragraph as follows:

Implementation of the proposed Project would commit land designated as public ROW, commercial, residential, and open space uses at the stations, junction, and towers to transit uses. The majority of the Project alignment and components would be constructed within or above the public ROW and/or publicly owned property. However, no housing or businesses would be

displaced. As discussed in Chapter 2, Project Description, Subsection 2.11, Required Permits and Approvals, the Project Sponsor is seeking to amend LAMC Sections 12.32 and 11.5.7 to create an Overlay District or Specific Plan pursuant to LAMC section 11.5.7 to provide for consistent application of Project design standards, limitations, and operational measures. With approval of the permits and approvals listed in Subsection 2.11, ~~the amendments to the zoning code to allow the proposed Project uses~~, development of these Project components would not conflict with the applicable LAMC requirements at the time of Project implementation, and the impact would be less than significant.

Page 5-62, revise the second paragraph as follows:

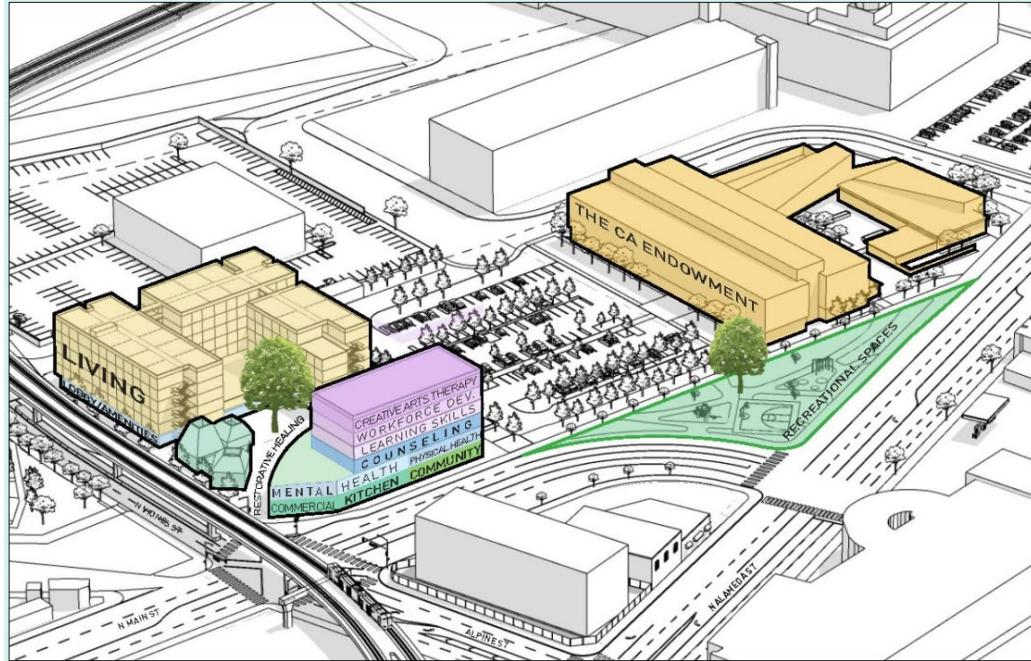
ANSI B77.1 requires the following vertical clearances: vehicles – five feet; vegetation or terrain – five feet; at-grade where pedestrians are present – eight feet; buildings – five feet; and roadways or railways – to be determined with the authority having jurisdiction. The proposed Project’s vertical clearance to the bottom of the cabins would range from 26 to 53 feet with an average of approximately 40 feet from ground level over the park. Given these required clearances and the height at which the cabins would travel over the Los Angeles State Historic Park, it will continue to be possible for most events to take place both under the majority of the alignment within the park and adjacent to the alignment. Aside from the tallest types of event uses (e.g., stages with tall screens), which could be sited directly adjacent to the alignment, all other event uses, such as food trucks, production areas, and seating areas, can occur directly beneath the alignment. In addition, ~~as~~ as depicted on Figure 5-3, according to the Los Angeles State Historic Park Bike and Pedestrian Bridge Feasibility Study, the Project alignment is located outside of typical locations for event stages. Moreover, Figure 5-4 depicts potential temporary special event stage, structures, and use locations that the Los Angeles State Historic Park has made available for special events within the park. However, the proposed Project could affect the ability to use those areas for specific special event structures. Coordination as to operation of special events at the Los Angeles State Historic Park and the proposed Project are anticipated to ~~be~~ be addressed in operational agreements related to the park.

Page 5-68, add a new Section 5.5.6:

Hope Village

The California Endowment published its Annual Report 2023³⁸ with additional information regarding the Hope Village, which anticipates offering housing, community, and health services to formerly incarcerated, unhoused, and economically disadvantaged residents. A graphic in the Annual Report 2023 depicts the Alameda Triangle, a City ROW between Alameda Street, North Main Street, and Alhambra Avenue, as “RECREATIONAL SPACES.”

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



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

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



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

Footnote 38: The California Endowment, Annual Report 2023, available at <https://www.calendow.org/annual-report> (accessed August 25, 2023).

SECTION 6.0 DESIGN AND USE OPTIONS

In addition to the general additions and corrections provided above, revise Section 6.0, Design and Use Options, as follows:

Page 6-1, revise the fourth paragraph as follows:

The five design and use options are described below, along with an analysis of their potential environmental impacts. The impact analysis is performed relative to the respective Project component of the proposed Project. For reference, the proposed Project is described in detail in Section 2.5 of the Project Description. Specifically, stations and junctions are described in Section 2.5.3, while towers are described in Section 2.5.4. All design and use options could be implemented individually, together, or in any combination without changing the significance conclusions reached in the EIR for the proposed Project.

Page 6-1, revise the fifth paragraph as follows:

6.2 Design Option A

6.2.1 Description

Design Option A includes a shift in the overall Project alignment between the Broadway Junction and Dodger Stadium Station to avoid aerial rights requirements over 451 E. Savoy Street. Figure 6-1 shows the proposed Project alignment, with additional detail as to the public ROW, publicly owned property, and private properties in Appendix P, Design Option A Plan and Profile. As shown in Figure 6-2 below, under Design Option A, while headed north from the Broadway Junction, the alignment would shift to be further west from 451 E. Savoy Street. This shift would result in the alignment crossing over a small portion of Cathedral High School. This Design Option includes changes to the Project components of Broadway Junction, Stadium Tower, and Dodger Stadium Station. These changes are described below.

Page 6-2, revise the first paragraph as follows:

In addition, the shift at Stadium Tower would result in utility relocations, including the relocation of a water valve and encroachment into the City's water easement in this location, as well as the potential addition of a retaining wall on the upslope. The shift at Dodger Stadium Station would also result in, the realignment of the Dodger Stadium perimeter roadway. In addition, construction of the Dodger Stadium Station at this location would require utility relocations, including relocation of a 36-inch storm drain and telecom line and encroachment into the City's water easement at this location. Moreover, construction of the Dodger Stadium Station at this location requires construction on steeper slopes and the potential addition of a retaining wall to accommodate the steeper approach to the station. The Dodger Stadium Station at this location would also require removal of ~~additional~~ 337 parking spaces at the Dodger Stadium property (compared to 194 for the proposed Project) and requires a longer walk for proposed Project passengers to travel between the Dodger Stadium Station Dodger Stadium.

Page 6-8, revise the first full paragraph as follows:

Design Option A does not materially differ in overall dimension, location, building material, or construction technique as compared to the proposed Project. Design Option A would have similar impacts to the proposed Project in the following CEQA impact areas: Agriculture and Forestry Resources; Hazards and Hazardous Materials; Hydrology and Water Quality; ~~Land Use and Planning~~; Mineral Resources; Noise; Population and Housing; Public Services; Recreation; Transportation; Tribal Cultural Resources; and Wildfire. Any mitigation measures required for the respective proposed Project components would also be required for those of Design Option A.

Page 6-11, revise the last full paragraph as follows:

Air Quality

Under Design Option A, the Broadway Junction would result in similar impacts related to air quality as the proposed Project. Therefore, no additional analysis is required for this Project component. Stadium Tower and Dodger Stadium Station are the only components of Design

Option A that would result in impacts that differ from the proposed Project. Therefore, an additional analysis of air quality impacts from Stadium Tower and Dodger Stadium Station is provided below. In addition, under Design Option A, all operational impacts would be less than significant and similar to the proposed Project. As such, additional analysis of operational impacts is not required.

Page 6-13, revise the first paragraph as follows:

Biological Resources

Under Design Option A, the Broadway Junction and Dodger Stadium Station would result in similar impacts related to biological resources as the proposed Project, and would similarly implement the project design features BIO-PDF-A through BIO-PDF-H in order to provide additional environmental benefits related to biological resources. Therefore, no additional analysis is required for these Project components. Stadium Tower is the only component of Design Option A that would result in impacts that differ from the proposed Project. Therefore, an additional analysis of biological resources impacts from Stadium Tower is provided below. In addition, under Design Option A, all operational impacts would be less than significant and similar to the proposed Project. As such, additional analysis of operational impacts is not required.

Page 6-13, revise the second paragraph as follows:

A tree inventory report was prepared (attached to Appendix C of this Draft EIR), and trees occurring along the Project alignment were inventoried for species, size, and location. The City of Los Angeles Planning Department considers all trees with trunk diameters of eight inches or greater as ‘significant.’ Based upon the tree inventory report, ~~3155~~ significant trees at the Stadium Tower location, including the fire buffer zone (as described in Section 3.20, Wildfire), for construction would be removed under the proposed Project. Using this same tree inventory report, ~~up to approximately 85 significant trees would be removed at a similar number of significant trees would be removed at Stadium Tower location under Design Option A, including the fire buffer zone. This would result in up to 54 additional significant trees being removed for construction and operation of the Stadium Tower under Design Option A.~~ None of these inventoried trees were identified as City-ordinance protected trees.

Page 6-17, add in the following paragraph before the “Utilities and Service Systems” heading as follows:

Land Use and Planning

Under Design Option A, the Broadway Junction and Stadium Tower would result in similar impacts related to land use as the proposed Project. Therefore, no additional analysis is required for these Project components. An additional analysis of land use impacts from Dodger Stadium Station is provided below.

Dodger Stadium Station

Dodger Stadium Station under Design Option A would result in the removal of additional parking spaces as compared to the proposed Project. As discussed in Section 3.11, Land Use and Planning, the Dodger Stadium CUP requires “[t]hat automobile parking facilities for a minimum of one (1)

automobile for each 3.6 seats provided in the Stadium shall be provided and maintained on the site generally . . .”. Condition no. 1 of the Dodger Stadium CUP states that Dodger Stadium “shall have a maximum seating capacity of 56,000 persons.” Condition no. 3 of the Dodger Stadium CUP requires “[t]hat automobile parking facilities for a minimum of one (1) automobile for each 3.6 seats provided in the Stadium shall be provided and maintained on site”, so a total of 15,556 parking spaces must be provided and maintained on site. There are currently a total of 18,889 parking spaces provided and maintained on site. Design Option A would permanently remove 337 parking spaces for the Dodger Stadium Station, due to the increased distance to Dodger Stadium requiring additional area for the proposed pedestrian connection to Dodger Stadium, as well as the retaining wall. Similar to the proposed Project, however, and consistent with the Dodger Stadium CUP, a total of 18,552 parking spaces would remain on site, exceeding the required parking spaces under the CUP. While additional parking spaces would be temporarily utilized at Dodger Stadium for Project construction, the number of parking spaces would at all times exceed the 15,556 total parking spaces that must be provided and maintained on site pursuant to the CUP. Accordingly, Design Option A is consistent with the requirements of the Dodger Stadium CUP and similar to the proposed Project and with the implementation of Mitigation Measure LUP-A, impacts with respect to land use would be less than significant with mitigation.

Page 6-18, revise the second to last paragraph as follows:

In the process of selecting tower locations, the proposed Project prioritizes the use of public property and minimizes private land acquisition, and also considers the proposed Project’s relationship to existing adjacent and potential future land uses. Technical considerations of tower locations also include optimizing the height of the towers and minimizing the number of towers. Additionally, the proposed Project limits the bend on the towers to less than 1.5 2 degrees.

Page 6-20, revise the second and third paragraphs as follows:

Compared to the proposed Project, Design Option B would potentially result in ~~potential additional technical considerations constraints due to the taller because the tower that approaches the limits of technical feasibility~~ due to the increased angle of bend at the Alameda Tower compared to the proposed Project.

Additionally, Design Option B results in the need for additional private aerial rights requirements. Design Option B includes an increased bend on the Alameda Tower resulting in cables and gondola cabins in closer proximity to private property between Alameda Station to the Chinatown/State Park Station. The proposed Project aerial rights requirements are shown on Figure 6-12 and the proposed Design Option B shift and associated aerial rights requirements are shown on Figure 6-13, with additional detail as to the public ROW, publicly owned property, and private properties provided in Appendix Q, Design Option B Plan and Profile.

Page 6-28, add the following sentence and revise the last sentence of the page as follows:

Similar to the proposed Project, Design Option B would implement Mitigation Measure TRA-A, which would prohibit right turns on red from westbound Alhambra Avenue to northbound

Alameda Street in order to alleviate potential visibility issues associated with operation of the Alameda Tower.

In addition, similar to the proposed Project, operation of Design Option B would provide additional transit and pedestrian connections, and would result in an overall reduction in VMT, resulting in a beneficial effect on the environment. Therefore, similar to the proposed Project, and with the implementation of Mitigation Measures TRA-A, TRA-B, and TRA-C, impacts with respect to transportation under Design Option B would be less than significant with mitigation.

Page 6-29, revise the first sentence of the second paragraph as follows:

In response to stakeholder feedback, who asked the Project Sponsor to consider a taller Chinatown/State Park Station to increase the height of cabins entering and ~~existing~~ exiting the station along Spring Street, Design Option C consists of a 35-foot overall height increase at the Chinatown/State Park Station.

Page 6-49, revise the fourth paragraph as follows:

Under Design and Use Option E, Mitigation Measure HAZ-A, which requires preparation and submittal to LADBS of a ~~s~~Soil and Groundwater Management Plan prior to any re-grading, decommissioning, or construction activities, would still be required. Implementation of HAZ-A will specify methods for handling and disposal in the event contaminated groundwater is encountered during construction of Design and Use Option E, to reduce impacts to less than significant. Therefore, similar to the proposed Project, impacts with respect to hazards and hazardous materials for the proposed pedestrian bridge under Design and Use Option E would be less than significant with mitigation.

SECTION 7.0 ACRONYMS

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

SECTION 8.0 LIST OF PREPARERS

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

SECTION 9.0 REFERENCES

The added references below were included on the proposed Project's SB 44 website at the time the Draft EIR was published for public review, but were inadvertently omitted from Section 9.0, References, of the Draft EIR.

Page 9-1, revise before 3.1 Aesthetics Section as follows:

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APPENDICES

Other than the general corrections and additions and other applicable corrections provided above, no specific corrections or additions have been made to Appendices A through D, Appendices F through I, Appendices K through M, Appendices O through P, and Appendix R of the Draft EIR. Specific clarifications and/or additions to Appendices E, J, and N are discussed below.

APPENDIX E BIOLOGICAL RESOURCES ASSESSMENT

In addition to the general additions and corrections provided above, revise Appendix E, Biological Resources Assessment, as follows:

Page 19, revise the third to last sentence of the third paragraph as follows:

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

Page 19, add the following footnote to the first sentence of the last paragraph,

A tree inventory report was prepared by Carlberg Associates (2022) for the Project alignment, including the areas along the alignment between Project components, and is included as Appendix B.⁶

Footnote 6: Carlberg Associates prepared an Updated Tree Report on May 11, 2023, which clarified the criteria for inclusion in the report's tree inventory, and remedies certain counting errors, although the overall number of inventoried trees and the number of protected trees required for removal remain the same as in the March 28, 2022 tree inventory report. The Updated Tree Report is included in Appendix K.1 of the Final EIR.

Page 21, revise the second paragraph as follows:

AECOM biologist Art Popp conducted a field survey of the proposed Project alignment on April 1, 2020, to document and photograph existing biological resources. Weather conditions during the survey included temperatures ranging between 67 to 72 degrees Fahrenheit, clear skies, and wind generally 1 to 3 miles per hour. A ~~follow-up~~ second survey to verify and record tree species occurring within the Project component footprints was conducted on April 24, 2021. A third survey was performed on March 23, 2023 to provide an updated habitat assessment for sensitive species and supplementary wildlife survey effort. This survey effort is discussed in greater detail in Appendix G, Supplemental Biological Resources Report, of the Final EIR. Results of the field surveys were used to determine the presence of biological resources such as sensitive ecological areas, wetlands, wildlife migratory corridors, and/or conserved areas within the Project area and if those areas could potentially support special-status species and sensitive communities identified during the literature review.

Page 40, revise the first sentence of the second paragraph as follows:

~~Both~~ All three field surveys were conducted during the bird breeding season, generally considered to extend from February 1 through September 30, or as early as December or January through July for raptor species.

Page 45, revise the second paragraph as follows:

Table 6-1 presents the number of trees within the Project alignment that would be impacted by construction of the Project and are proposed for removal. These trees are identified as "Protected Trees," 'significant' trees' as defined by the City's Planning Division, street trees occurring within the public ROW, trees occurring on Los Angeles State Historic Park property, and trees within the SR-110 Caltrans ROW. Based upon field surveys conducted on April 24, 2021, and a review of the March 28, 2022, tree report, included as Appendix B of Appendix E of the Draft EIR, and the Updated Tree Report, included as Appendix K.1 of the Final EIR, 250 trees along the Project alignment are proposed for removal and 10 trees that were inventoried will be preserved. A list of the trees identified at Project component sites proposed for removal with the diameter at 4.5 feet (DBH), tree height information, canopy spread, health, structure, and regulatory status are provided in Table 10, Appendix B.

Page 47, revise the third paragraph as follows:

The Project would incorporate BIO-PDF-A, which would establish a Tree Protection Zone to protect trees during construction which are not identified to be removed but are either within the construction footprint or in close proximity to the construction footprint. In addition, the Project would incorporate BIO-PDF-F and would comply with applicable tree replacement requirements,

based on the jurisdiction of the property where each tree is located. The Project ~~proposes to~~ would replace trees located on the California Department of Parks and Recreation State property and private property at a 1:1 ratio, with a minimum of 24-inch box tree within the Project area, or at another location within the City.

Page 50, revise section 7.0 Project Design Feature as follows:

7.0 Project Design Features

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

BIO-PDF-B: Avian Collision Mitigation, Monitoring, and Adaptive Management Plan.

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

- (1) Monitoring for first 5 years of Project operation: All Project operations and maintenance personnel, including subcontractors, shall undergo training on how to identify and report avian and bat injuries or mortalities detected in the Project area during routine maintenance activities.
- (2) An adaptive management table will be developed, outlining measures to implement upon detection of incidents associated with common species and special status species.
- (3) Annual reporting criteria and requirements.

BIO-PDF-C: Cabin Window Features.

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

BIO-PDF-D:

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

BIO-PDF-E: Tree Disease Management.

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

BIO-PDF-F:

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

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

BIO-PDF-G:

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

BIO-PDF-H:

Any fencing used during and after the proposed Project’s construction would be constructed with materials that are not harmful to wildlife. Prohibited materials should include, but are not limited to, spikes, glass, razor, or barbed wire. Where chain link fences are used, they would utilize scrim, green screen or other such coverage to avoid injuring wildlife. Use of chain link fences would be minimal and would not create barriers to wildlife dispersal. All hollow posts and pipes would be capped to prevent wildlife entrapment and mortality. Metal fence stakes used on the proposed Project site would be plugged to avoid this hazard. Fences would not have any slack that may

cause wildlife entanglement. In addition, workers will be educated and instructed in best practices to avoid attracting wildlife to the construction site, including requiring lids on all trashcans and permitting eating in designated areas or offsite, with daily cleanup of such areas. All workers will be educated on reporting protocols for the appropriate authorities in the event wildlife is encountered on the construction site.

Page 51, revise the first bullet point as follows:

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

Page 51, revise the final bullet point as follows:

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

APPENDIX J GREENHOUSE GAS EMISSIONS TECHNICAL REPORT

In addition to the general additions and corrections provided above, revise Appendix J, Greenhouse gas Emissions Technical Report, as follows:

Page 2, revise the fourth paragraph as follows:

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

Page 2, revise the sixth paragraph as follows:

The Project's stations, junction, towers, and gondola cabins would incorporate energy efficient, sustainable, water and waste efficient, and resilient features. The proposed stations and junction are designed to be open-air buildings, allowing for passive ventilation strategies and providing direct access to outdoor air and natural daylight, while also providing adequate shade protection from heat. The cabins would be ventilated to enhance air quality for passengers. The electrical power for the Project would be supplied by LADWP through the utility's Green Power Program, as described in GHG-PDF-A. Accordingly, the primary electricity usage associated with the Project would come from renewable resources. In addition, the Project would install backup battery

storage at each station, tower, and junction to provide backup power to allow unloading of the system in the event of a temporary power grid failure.

Page 27, revise the last paragraph as follows:

Project-related electricity use can result in indirect emissions, due to electricity generation activities occurring at off-site power plant locations. For this Project, the electrical power for operation of the aerial gondola system and associated stations, junction, and towers would be supplied by LADWP under the utility's Green Power Program, as described in GHG-PDF-A. As a result, the primary electricity usage associated with the Project would come from renewable resources.

Page 32, revise the sixth paragraph as follows:

The emissions reduced associated with the Project's commitment to obtaining power through LADWP's Green Power Program, as described in GHG-PDF-A, was quantified using the expected power consumption of the aerial gondola system and the GHG intensity factors for LADWP's standard power portfolio. The emissions of GHGs reduced were converted to CO₂e using global warming potentials from the Intergovernmental Panel on Climate Change Fourth Assessment Report and are shown in **Table 4-8**.

Table 4-8: GHG Emissions Reduced Associated with Gondola System Electricity Usage, revise table note 5 as follows:

⁵ Emissions are shown as negative to represent the emissions benefit gained by the Project by committing to LADWP's Green Power Program, as described in GHG-PDF-A, which is supplied by 100% renewable resources.

Table C-1, revise row 1 as follows:

1	California Renewables Portfolio Standard (RPS) and SB 350	As most recently amended by SB 100 (2018), California's RPS increases the proportion of electricity from renewable sources to 33 percent renewable power by 2020; 50 percent renewable power by 2026; and, 60 percent renewable power by 2030. SB 350 (2015) also requires the State Energy Resources Conservation and Development Commission to double (by 2030) the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.	Consistent. Although this goal is not applicable to an individual transportation project, the electrical power for the operation of the Project's aerial gondola system and associated stations, junction, and towers would be supplied by the City of Los Angeles Department of Water and Power (LADWP) through the utility's Green Power Program, <u>as described in GHG-PDF-A</u>. As such, the primary electricity usage associated with the Project would come from renewable resources. Furthermore, the Project would incorporate energy efficient features, such as open-air stations and high-efficiency lighting. As a result, the Project would not impair implementation of the state's RPS or the energy efficiency and conservation targets of SB 350. LADWP is a municipal electricity generation service provider. In 2017, LADWP developed its own Power Strategic Long-Term Resource Plan (SLTRP) as an outline for supplying energy in accordance with the state's renewable energy goals. (See https://www.ladwp.com/ladwp/faces/wcnav_externalId/afpdoc?_adf.ctrl-state=rmkf94oql_25&_afLoop=764064428747531.)

Table C-2, revise row 1 as follows:

SB 350	Reduce GHG emissions in the electricity sector through the implementation of the 50 percent Renewables Portfolio Standard (RPS), doubling of energy savings, and other actions as appropriate to achieve GHG emissions reductions planning targets in the Integrated Resource Plan (IRP) process.	Consistent. Although this goal is not applicable to an individual transportation project, the electrical power for the operation of the Project's aerial gondola system and associated stations, junction, and towers would be supplied by the City of Los Angeles Department of Water and Power (LADWP) through the utility's Green Power Program, <u>as described in GHG-PDF-A</u>. As such, the primary electricity usage associated with the Project would come from renewable resources. Furthermore, the Project would incorporate energy efficient features, such as open-air stations and high-efficiency lighting. As a result, the Project would not impair implementation of the state's RPS or the energy efficiency and conservation targets of SB 350. LADWP is a municipal electricity generation service provider. In 2017, LADWP developed its own Power Strategic Long-Term Resource Plan (SLTRP) as an outline for supplying energy in accordance with the state's renewable energy goals. (See https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-pdoc?_adf.ctrl-state=rmkf94oql_25&_afLoop=764064428747531.)

Table C-4, revise row 1 as follows:

E-1 Renewable Energy Procurement	Expand use of renewable energy in electricity procurement (100% renewable electricity by 2035)	Consistent. Although this goal is not applicable to an individual transportation project, the electrical power for the operation of the Project's aerial gondola system and associated stations, junction, and towers would be supplied by the City of Los Angeles Department of Water and Power (LADWP) through the utility's Green Power Program, <u>as described in GHG-PDF-A</u>. As such, the primary electricity usage associated with the Project would come from renewable resources. LADWP is a municipal electricity generation service provider. In 2017, LADWP developed its own Power Strategic Long-Term Resource Plan (SLTRP) as an outline for supplying energy in accordance with the state's renewable energy goals. (See https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-pdoc?_adf.ctrl-state=rmkf94oql_25&_afLoop=764064428747531.)

Table C-4, revise row 2 as follows:

F-1 Photovoltaic Installations	Increase on-site solar photovoltaic installations	Consistent. The Project supports use of renewable power generation and use by committing to use green power from LADWP's Green Power Program, <u>as described in GHG-PDF-A</u>. As such, the primary electricity usage for the Project would come from renewable resources.

APPENDIX N RIDERSHIP MODEL DEVELOPMENT MEMORANDUM

In addition to the general additions and corrections provided above, revise Appendix N, Ridership Model Development Memorandum, as follows:

Page 2, revise the second paragraph as follows:

For example, driving costs include the cost of gas and parking at Dodger Stadium, which averaged around \$25.00 per vehicle in 2019. Transit costs include the cost of fares, such as Metro’s \$1.75 one way fare, and assuming no fare to ride the proposed Project for 84 Dodger games/events at Dodger Stadium each year. Both driving and taking transit take time, which will depend on where people going to a Dodger Game start their trip, levels of congestion, and the transportation mode that they take. For example drive time to Dodger Stadium gates from zip code 91103 (Old Pasadena) is approximately 25 minutes, with an additional 15 minutes for vehicles to make it through the parking gates to a parking space. Transit to Union Station takes approximately 22 minutes, with an additional 25 minutes for riders to get to the Dodger Stadium Express and ride to Dodger Stadium. The proposed Project is expected to save about 15 minutes of transit travel time in total.

Page 7, revise the last row as follows:

Transit	The model transit fare assumption for Metro was \$1.75 per ride, and the 2019 Metrolink distance-based fare for each station origin within a particular zip code were included in the model calculated transit travel cost. <u>The model assumes no fare to ride the proposed Project for 84 Dodger games/events at Dodger Stadium each year.</u>	\$1.75 (2019)	\$1.75 (2019)

5.3 EFFECT OF CORRECTIONS AND ADDITIONS

The Final EIR documents changes to the Draft EIR. As demonstrated by the following discussion, the modifications to the Draft EIR do not result in new significant impacts and do not warrant recirculation of the Draft EIR. CEQA Guidelines section 15088.5 requires that an EIR which has been made available for public review, but not yet certified, be recirculated whenever significant new information has been added to the EIR. The entire document need not be circulated if revisions are limited to specific portions of the document. The relevant portions of CEQA Guidelines section 15088.5 read as follows:

(a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant

new information” requiring recirculation include, for example, a disclosure showing that:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.
- (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

(Mountain Lion Coalition v. Fish and Game Com. (1989) 214 Cal.App.3d 1043)

- (b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

The information contained in this section and Section 6.0, Responses to Comments, of this Final EIR, clarifies, amplifies, or makes insignificant changes to the Draft EIR. Section 6.0, Responses to Comments, of this Final EIR, fully considers and responds to comments claiming that the proposed Project would have significant impacts or more severe impacts not disclosed in the Draft EIR and demonstrates that none of these comments provided substantial evidence that the Project would result in changed circumstances, significant new information, considerably different mitigation measures, or new or more severe significant impacts than were discussed in the Draft EIR. In addition, the information added to the Draft EIR is not significant because the Draft EIR is not changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the proposed Project. Rather, as provided by the following discussion, the corrections and additions to the Draft EIR would not result in new significant impacts or an increase in any impact already identified in the Draft EIR. Thus, none of the conditions in Section 15088.5 of the CEQA Guidelines are met.

General Corrections and Additions

The general corrections and additions above do not constitute new significant information resulting in new or more severe significant environmental impacts. The general corrections and additions provide an analysis of the proposed Project’s consistency with recently approved land use plans for informational purposes, minor technical revisions based on new naming conventions for Metro transit lines, confirmation of the LADWP’s ability to provide power for the proposed Project through the LADWP’s Green Power Program, and otherwise confirmed the inclusion of mobility hub at Dodger Stadium Station. The Dodger Stadium Station mobility hub was included within the Draft EIR’s analysis. The general corrections and additions also note that the CEQA streamlining provisions provided in SB 44 were extended subsequent to the release of the Draft EIR in SB 91, but no substantive provisions in SB 44 were

altered, and accordingly references to SB 44 also refer to SB 91. The general corrections and additions also provided additional information regarding the proposed Project's Additional Separation Buffer, that was described in the Draft EIR's Project Description and included in its analysis. Thus, no new impacts would result from these general corrections and additions.

Aesthetics

As set forth in the general corrections and additions above, in response to comments on the Draft EIR, updated and additional KOPs were prepared to support evaluation of potential impacts of the proposed Project on aesthetics and visual resources. The supplemental KOPs were updated to clarify certain design elements of the proposed Project, and additional visual simulations were also provided. As discussed in Section 5.1, above, the evaluation of updated and additional KOPs for the proposed Project does not result in significant impacts, and the aesthetic impacts of the proposed Project would be less than significant. Thus, no new impacts would result and impacts would continue to be less than significant.

Agriculture and Forestry Resources

There are no text changes proposed to Section 3.02, Agriculture and Forestry Resources, of the Draft EIR, other than those outlined in the general corrections and additions described above. Thus, no new impacts would result and impacts would continue to be less than significant.

Air Quality

There are no text changes proposed to Section 3.03, Air Quality, of the Draft EIR other than those outlined in the general corrections and additions described above. Thus, no new impacts would result and impacts would continue to be less than significant.

Biological Resources

Text changes constitute minor corrections or clarifications to the Draft EIR, including to clarify the criteria for the Tree Inventory Report's inventory and to update the inventory accordingly, to reference an additional survey conducted in responses to comments received on the Draft EIR, and to provide additional clarifying analysis that expands upon the analysis in the Draft EIR based on comments received. The changes otherwise incorporate additional Project Design Features at CDFW's request that provide additional environmental benefits for biological resources, and the additional survey confirmed the analysis provided in the Draft EIR. The additional clarifications also expand upon the analysis provided in the Draft EIR, and do not alter any of the Draft EIR's conclusions. The general corrections and additions also provided additional information regarding the proposed Project's Additional Separation Buffer, that was described in the Draft EIR's Project Description and included in its analysis. Thus, no new impacts would result and impacts would continue to be less than significant with mitigation.

Cultural Resources

Text changes constitute minor corrections or clarifications to the Draft EIR, including to recognize that preservation in place is the preferred manner of mitigating impacts to archaeological sites in the applicable mitigation measures. This revision is consistent with CEQA Guidelines section 15126.4(b), and merely restates an existing requirement. Thus, no new impacts would result and impacts would continue to be less than significant with mitigation.

Energy

There are no text changes proposed to Section 3.06, Energy, of the Draft EIR other than those outlined in the general corrections and additions described above. Thus, no new impacts would result and impacts would continue to be less than significant.

Geology and Soils

Text changes constitute minor corrections or clarifications to the Draft EIR. Thus, no new impacts would result and impacts would continue to be less than significant with mitigation.

Greenhouse Gas Emissions

Text changes constitute minor corrections or clarifications to the Draft EIR, including to incorporate a prior proposed Project commitment to obtain power through LADWP's Green Power Program in a Project Design Feature, GHG-PDF-A. Thus, no new impacts would result and impacts would continue to be less than significant.

Hazards and Hazardous Materials

Text changes constitute minor corrections or clarifications to the Draft EIR, including to revise Mitigation Measure HAZ-A to clarify that the Soil and Groundwater Management Plan shall be submitted to the LADBS for review prior to the commencement of demolition and construction activities and as a condition of the grading, construction, and/or demolition permit(s). The addition also recognizes that MM-HAZ-A requires full compliance with all applicable local, state, and federal regulations (including but not limited to, as applicable, OSHA Safety and Health Standards, Cal/OSHA requirements, federal, state and local waste disposal regulations, SCAQMD Rule 1166, as well as any other applicable requirements of the California Department of Toxic Substances, the Los Angeles Regional Water Quality Control Board, and the City of Los Angeles) related to the identification, excavation, transportation, and disposal of hazardous materials, including those encountered in excavated soil and dewatered groundwater. Further, Appendix M, Potential Excavated Material Disposal Analysis, of this Final EIR, provides additional, clarifying information regarding potential disposal of excavated material. Thus, no new impacts would result and impacts would continue to be less than significant with mitigation.

Hydrology and Water Quality

There are no text changes proposed to Section 3.10, Hydrology and Water Quality, of the Draft EIR other than those outlined in the general corrections and additions described above. Thus, no new impacts would result and impacts would continue to be less than significant.

Land Use and Planning

As set forth in the general corrections and additions above, additions include analysis of the proposed Project's consistency with various land use plans. Under CEQA Guidelines section 15125(d), an EIR must discuss "any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans," and does not require a discussion where the proposed project would be consistent with such plans. Accordingly, the Draft EIR was not required to discuss consistency with each and every

plan or policy, and the consistency analysis has been provided for informational purposes. Thus, no new impacts would result and impacts would continue to be less than significant with mitigation.

Mineral Resources

There are no text changes proposed to Section 3.12, Mineral Resources, of the Draft EIR other than those outlined in the general corrections and additions described above. Thus, no new impacts would result and impacts would continue to be less than significant.

Noise

Text changes constitute minor corrections or clarifications to the Draft EIR, including to revise Mitigation Measure VIB-A to specify that the vibration monitoring equipment would be placed at a distance of “approximately 26 feet” rather than “at least 26 feet” from the Avila Adobe (1970s addition), El Grito Mural and The Old Winery. The general corrections and additions above include a discussion of Appendix L, 3S Sound Measurements Memo, of the Final EIR, is a memorandum from Leitner Poma providing additional detail on the operational noise from the 3S gondola system in Tyrol, Austria at the Stubai Glacier. This memorandum was provided as an update to a prior memorandum from Leitner Poma about its 3S gondola system, which is included in the Noise Measurement Detail at p. A-24 in Appendix M, Noise and Vibration Technical Report, of the Draft EIR. Appendix L, 3S Sound Measurements Memo, of the Final EIR provides additional detail about the Leitner Poma 3S gondola system but does not change any of the information previously provided as part of the Noise Measurement Detail at p. A-24 in Appendix M, Noise and Vibration Technical Report, of the Draft EIR. Thus, no new or more severe significant impacts would result and construction impacts would continue to be significant and unavoidable as set forth in the Draft EIR and operational impacts would continue to be less than significant as set forth in the Draft EIR.

Population and Housing

There are no text changes proposed to Section 3.14, Population and Housing, of the Draft EIR other than those outlined in the general corrections and additions described above. Thus, no new impacts would result and impacts would continue to be less than significant.

Public Services

There are no text changes proposed to Section 3.15, Public Services, of the Draft EIR other than those outlined in the general corrections and additions described above. Thus, no new impacts would result and impacts would continue to be less than significant.

Parks and Recreational Facilities

Text changes to Section 3.16, Parks and Recreational Facilities, of the Draft EIR include minor typographical corrections in addition to the general corrections and additions outlined above. Thus, no new impacts would result and impacts would continue to be less than significant.

Transportation

As set forth in the general corrections and additions above, revisions include refinements to Mitigation Measure TRA-A to identify the mitigation for each identified location, consistent with the analysis in the

Draft EIR, and to incorporate TRA-PDF-A, to provide additional environmental benefits and as a best practice to further enhance pedestrian visibility. In addition, the general corrections and additions provide an analysis of the proposed Project's consistency with recently approved land use plans for informational purposes, minor technical revisions based on new naming conventions for Metro transit lines and clarification regarding ridership model assumptions, and otherwise confirmed the inclusion of mobility hub at Dodger Stadium Station following additional consultation with the Los Angeles Dodgers. The Dodger Stadium Station mobility hub was included within the Draft EIR's analysis. Thus, no new impacts would result and impacts would continue to be less than significant with mitigation.

Tribal Cultural Resources

There are no text changes proposed to Section 3.18, Tribal Cultural Resources, of the Draft EIR other than those outlined in the general corrections and additions described above. Thus, no new impacts would result and impacts would continue to be less than significant with mitigation.

Utilities and Service Systems

Text changes constitute minor corrections or clarifications to the Draft EIR, including to incorporate a prior proposed Project commitment to obtain power through LADWP's Green Power Program in a Project Design Feature, GHG-PDF-A. Thus, no new impacts would result and impacts would continue to be less than significant with mitigation.

Wildfire

Text changes constitute minor corrections or clarifications to the Draft EIR to fix typographical errors. In addition, to the general corrections and additions outlined above, the general additions include an overview of Appendix J, Reax Memo re Attorney General Guidance to the Final EIR, which provides a discussion of the Draft EIR analysis' consistency with the October 2022 Attorney General guidance for lead agencies to analyze and mitigate wildfire risks under CEQA for informational purposes. Thus, no new impacts would result and impacts would continue to be less than significant.

Alternatives

Text changes constitute minor corrections or clarifications to the Draft EIR, including to correct minor typographical errors in the proposed Project impacts summary, to add additional information regarding the TSM Alternative, to add additional information regarding an alternative that was considered but dismissed from further consideration (the Pedestrian Enhancement Alternative) because it would not meet most of the project objectives to the same degree as the proposed Project, and to provide additional information related to biological resources, hazards, and transportation related to the adoption of additional project design features and refinements to mitigation measures described above. In addition, clarifying revisions have been provided for the Spring Street Alignment Alternative's Mitigation Measure TRA-A to specify the visibility enhancements required to mitigate geometric hazards for site visibility for pedestrians. Further, to provide additional environmental benefits and as a best practice to further enhance pedestrian visibility, the Spring Street Alignment Alternative would also incorporate TRA-PDF-A, which would stripe a high visibility crosswalk and provide upgraded lighting for the driveway crossing south of the Los Angeles State Historic Park. Thus, no new impacts would result and no new feasible alternatives have been identified.

Other CEQA Considerations

Text changes constitute minor corrections or clarifications to the Draft EIR, including to add a discussion of project design features and make clarifications consistent with those described above for Mitigation Measure HAZ-A, and to add a discussion regarding Chavez Ravine and the Project Sponsor's commitment to develop an interpretation plan with stakeholder groups. This addition merely expands upon information provided in the Draft EIR for informational purposes. The general corrections and additions also provide an overview of how the proposed Project would not impair or impact potential recreational uses of the Alameda Triangle anticipated by The California Endowment, as well as how the proposed Project alignment would not require aerial rights requirements over 130 West College Street, where subsequent the publication of the Draft EIR, an application for an office building was filed. Thus, no new impacts would result.

Design and Use Options

Text changes constitute minor corrections or clarifications to the Draft EIR, including to provide specific information regarding the extent of parking removal under Design Option A. Parking is not a required transportation analysis under CEQA, and the additions provide an analysis of consistency with the Dodger Stadium CUP, concluding that Design Option A is consistent with the requirements of the Dodger Stadium CUP and similar to the proposed Project and with the implementation of Mitigation Measure LUP-A, impacts with respect to land use would be less than significant with mitigation. In addition, the Final EIR provides additional detail as to the public ROW, publicly owned property, and private properties for Design Options A and B in Appendix P, Design Option A Plan and Profile and Appendix Q, Design Option B Plan and Profile, respectively. Thus, no new impacts would result.

Other Sections

Text changes to other sections of the Draft EIR constitute minor corrections or clarifications, or are otherwise consistent with the revisions outlined above, and do not result in any new significant impacts or a substantial increase in an impact already identified in the Draft EIR.

Appendices

Text changes to the Draft EIR's appendices constitute minor corrections or clarifications, or are otherwise consistent with the revisions outlined above, and do not result in any new significant impacts or a substantial increase in an impact already identified in the Draft EIR.

Conclusion

Based on the above, the corrections and additions, which include proposed refinements to the proposed Project, do not result in any new significant impacts or a substantial increase in an impact already identified in the Draft EIR. In addition, the corrections and additions to the Draft EIR clarify, amplify or make insignificant refinements to the Draft EIR. Further, for many issue areas, the proposed corrections and additions would reduce impacts set forth in the Draft EIR. Thus, recirculation of the Draft EIR is not required.

Section 6.0 | Responses to Comments

6.1 INTRODUCTION

Section 15088(a) of the CEQA Guidelines states that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response. The Lead Agency shall respond to comments that were received during the noticed comment period and any extensions and may respond to late comments.” This section of the Final EIR provides a list of persons, organizations, and public agencies that commented on the Draft EIR, along with responses of the Lead Agency to significant environmental points raised in the review and consultation process.

The Draft EIR was submitted to the State Clearinghouse Office of Planning and Research and circulated for public review from October 17, 2022 to January 17, 2023.

This Section 6.0, Responses to Comments, includes: Section 6.1, Introduction, Section 6.2, Topical Responses, and Section 6.3, Responses to Comments, which includes responses to all comments received on the Draft EIR during the Draft EIR public review period.¹ In addition, verbal comments made at the virtual February 8, 2023, public hearing were deemed timely submitted for the purposes of the Draft EIR comment period and are responded to in this Section 6.0.²

In accordance with Section 15088(c) of CEQA, reasoned, factual responses have been provided to all comments received during the Draft EIR public review period, with a particular emphasis on significant environmental issues. The comments and responses are organized as follows: state agencies (“S”), local agencies (“L”), groups and organizations (“GO”), individuals (“P”), and verbal and written comments received during the four Draft EIR public hearings (“PH”). All comments and responses to comments are included in this Final EIR and will be considered by the Metro Board prior to certification of this EIR and in any approval of the proposed Project.

Each comment letter, email, voicemail, and public hearing verbal or written comment, have been assigned a number in addition to a letter corresponding to the categories described above. The body of each comment letter, email, voicemail, and public hearing verbal or written comment, has been separated into individual comments, which also have been numbered. This results in a tiered numbering system, whereby the first comment in, for example, Comment Letter GO1 is depicted as Comment GO1-1, and so on. Copies of each comment letter, email, voicemail, and public hearing written comment, are provided in Appendix C, Public Comments on the Draft EIR, of this Final EIR. Copies of the transcripts of each verbal comment received during public hearings, are provided in Appendix B, Public Hearing Transcripts, of this Final EIR. All of the comments received are listed in Table 6-1 below, which provides a list of those parties that provided written comments on the Draft EIR during the public review period. Refer to Section 3.0, Project Description, for revisions to the proposed Project, and Section 5.0, Corrections and Additions, for specific additions and corrections to the Draft EIR made in the Final EIR.

¹ Certain Topical Responses in Section 6.2 and responses to comments in Section 6.3 include footnotes citing to or discussing reference materials. The reference materials are available on the proposed Project’s SB 44 website. Two documents, the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment* and the *Parking Study*, are referenced frequently throughout Section 6.3, Responses to Comments, but are not provided in footnotes because of the frequency with which they are cited. These documents were prepared by Fehr & Peers and are available on the proposed Project’s SB 44 website.

² As discussed in Topical Response A, SB 44, in light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023, after the public review period closed on January 17, 2023.

Table 6-1: Comments from Public Agencies, Groups, Organizations, and Individuals

Letter	Name (title)	Organization/Address	Date of Letter
State Agencies (S)			
S1	Erinn Wilson-Olgin, Environmental Program Manager I, South Coast Region; Felicia Silva, Environmental Scientist	California Department of Fish and Wildlife (CDFW) South Coast, Region 5 Habitat Conversation Planning Program 3030 Old Ranch Parkway, Suite 400 Seal Beach, CA 90740	January 14, 2023
S2	Jason De Wall, Northern Field Division Chief	California Department of Parks and Recreation 1925 Las Virgenes Road Calabasas, CA 91302	January 17, 2023
S3	J.I. Perry, Captain Commander; Sergeant Jaime L. Allen	Department of California Highway Patrol Central Los Angeles Area 777 West Washington Blvd Los Angeles, CA 90015	January 13, 2023
S4	Miya Edmonson, IGR/CEQA Branch Chief; Anthony Higgins, Associate Transportation Planner	Department of Transportation District 7, Division of Planning (Caltrans) 100 S. Main Street, MS-16 Los Angeles, CA 90012	January 17, 2023
S5	Kimberly M. Johnson, Tribal Secretary	Gabrieleno/Tongva San Gabriel Band of Mission Indians P.O. Box 693 San Gabriel, CA 91778-0693	January 30, 2023
Local Agencies (L)			
L1	Evelyn Aguilar, Air Quality Specialist	South Coast Air Quality Management District (SCAQMD) 21865 Copley Drive Diamond Bar, CA 91765	October 20, 2022
L2	Matthew W. Szabo, City Administrative Officer	City of Los Angeles 200 North Main Street, Suite 1500 Los Angeles, CA 90012-4137	January 7, 2023
Groups and Organizations (GO)			
GO1	Phyllis Ling Outreach Committee Chair / Solano Canyon Resident Representative	Historic Cultural North Neighborhood Council 200 N. Spring Street Los Angeles, CA 90012	December 12, 2022
GO2	Jessica Lall, President & CEO	Central City Association of Los Angeles, (CCA) 626 Wilshire Blvd., Suite 850 Los Angeles, CA 90017	December 12, 2022
GO3	Darrel A. Saucedo, Chief Operating Officer	Los Angeles Latino Chamber of Commerce 8531 Wellsford Place, Ste. E Santa Fe Springs, CA 90670	December 14, 2022
GO4	Thomas R. Savio, Executive Director	Los Angeles Union Station Historical Society (LAUSHS) P.O. Box 411682 Los Angeles, CA 90041	November 22, 2022

Letter	Name (title)	Organization/Address	Date of Letter
GO5	Raymond Su, President, Board of Directors Michelle Jong, Past President, Chinese Family History Group Clayton Frech, CEO and Founder, Angel City Sports David Kent, Gold President, Bicycle Angels Evelyn Lee, President, Chinese Family History Group Jose J. Hernandez, Principal, Ann Street Elementary Lisa Loo, Director – Community Services Jorge Parra, Jr., Educator	Los Angeles Chinatown Firecracker Run Committee, Inc. P.O. Box 86132 Los Angeles, CA 90086	August 12, 2022
GO6	Dennis J. Huang, Executive Director & CEO	Asian Business Association 767 N. Hill Street, Ste. 308 Los Angeles, CA 90012	December 7, 2022
GO7	Kellie Hawkins Davis, Climate Resolve Board Member	Climate Resolve 525 S. Hewitt Street Los Angeles, CA 90013	December 18, 2022
GO8	John Given, Law Office of John P. Given	LA Parks Alliance 1855 Industrial Street, #106 Los Angeles, CA 90021	December 21, 2022
GO9	Thomas R. Savio, Executive Director	Los Angeles Union Station Historical Society (LAUSHS) P.O. Box 411682 Los Angeles, CA 90041	January 5, 2023
GO10	Rachel Norton, Executive Director	California State Parks Foundation 33 New Montgomery Street, Suite 520 San Francisco, CA 94105	January 9, 2023
GO11	Thomas R. Savio, Executive Director	Los Angeles Union Station Historical Society (LAUSHS) P.O. Box 411682 Los Angeles, CA 90041	January 17, 2023
GO12	Barbara Hensleigh, Chair, Central Group (Los Angeles)	Sierra Club 1000 Alameda Street Los Angeles, CA 90012	January 17, 2023
GO13	Paulina Torres, Staff Attorney Damon Nagami, Senior Attorney	Natural Resources Defense Council (NRDC) 1314 2 nd Street Santa Monica, CA 90401	January 17, 2023
GO14	John Given, Law Office of John P. Given	LA Parks Alliance 2309 Santa Monica Blvd., #438 Santa Monica, CA 90404	January 17, 2023
GO15	Thomas J Vozzo, CEO; Steve Delgado, COO	Homeboy Industries 130 W. Bruno Street Los Angeles, CA 90012	January 18, 2023
GO16	Adrian Scott Fine, Senior Director of Advocacy	Los Angeles Conservancy 523 W. Sixth Street, Ste. 826 Los Angeles, CA 90014	January 17, 2023

Letter	Name (title)	Organization/Address	Date of Letter
GO17	Douglas P. Carstens	The California Endowment (TCE) 1000 N. Alameda Street Los Angeles, CA 90012	January 17, 2023
GO18	Dr. Clyde T. Williams, President	Coalition for a Safe Community 4117 Barrett Rd. Los Angeles, CA 90032-1712	January 12, 2023
GO19	Maria S. Salinas, President & CEO	Los Angeles Area Chamber of Commerce 350 S. Bixel Street Los Angeles, CA 90017	January 1, 2023
GO20	The Board of ADCCLA Laura, Yuval, Gabrielle, Harley, Tim, David, and Todd Terrazas	Arts District Community Council (ADCCLA) 1855 Industrial Street, #106 Los Angeles, CA 90021	January 3, 2023
GO21	Kathleen Johnson, Executive Director	Los Angeles River State Park Partners 1799 Baker Street Los Angeles, CA 90012	January 4, 2023
GO22	Richard A. Rojas, Sr., Immediate Past-Chairperson	Latino Outdoors 1000 Broadway, Suite 480 Oakland, CA 94607	January 18, 2023
GO23	Conchita Marusich, President	Old Spanish Trail Association (OSTA) 4824 Guadalupe Trail Albuquerque, NM 87107	January 17, 2023
GO24	Jon Christensen, Adjunct Assistant Professor	3323 Public Affairs Building, Box 951656 Los Angeles, CA 90095-1656	January 17, 2023
GO25	Barbara Broide, Co-President Wendy-Sue Rosen, Co- President	Coalition for a Beautiful Los Angeles (CBLA) 200 S. Barrington Ave., Box 49583 Los Angeles, CA 90049	January 17, 2023
GO26	Gay Q. Yuen, Ph.D., Board Chair	The Chinese American Museum 425 N. Los Angeles Street Los Angeles, CA 90012	January 18, 2023
GO27	Robin Mark, Los Angeles Program Director	Trust for Public Land 135 W. Green Street, Suite 200 Pasadena, CA 91105	January 18, 2023
GO28	David Carle, President	California State Park Rangers Association (CSPRA) P.O. Box 39 Lee Vining, CA 93541	December 20, 2022
GO29	Sue Bell Yank, Executive Director	Clockshop 2806 Clearwater Street Los Angeles, CA 90039	January 12, 2023
GO30	Thomas R. Savio, Executive Director	Los Angeles Union Station Historical Society (LAUSHS) P.O. Box 411682 Los Angeles, CA 90041	December 31, 2022
GO32	Sue Bell Yank, Executive Director	Clockshop 2806 Clearwater Street Los Angeles, CA 90039	October 13, 2022
GO33	Sue Bell Yank, Executive Director	Clockshop 2806 Clearwater Street Los Angeles, CA 90039	October 13, 2022

Letter	Name (title)	Organization/Address	Date of Letter
GO34	Thomas R Savio, Executive Director	Los Angeles Union Station Historical Society (LAUSHS) P.O. Box 411682 Los Angeles, CA 90041	October 22, 2022
GO35	Martha I. Jimenez, Executive Vice President / General Counsel / Secretary	The California Endowment (TCE) 10000 North Alameda Street Los Angeles, CA 90012	October 7, 2022
GO36	David Carle, President	California State Park Rangers Association (CSPRA) PO Box 39 Lee Vining, CA 93541	October 14, 2022
Individuals (P)			
P1	Topher Hendricks		October 17, 2022
P2	Bert Glatstein		October 17, 2022
P3	Israel Vasquez		October 17, 2022
P4	Riley McNair		October 18, 2022
P5	Jack Humphreville		October 18, 2022
P6	James Martin		October 18, 2022
P7	Alexander M Kargher		October 18, 2022
P8	Margaret Light		October 20, 2022
P9	Aram Hacobian		October 21, 2022
P10	Brian VanRiper		October 21, 2022
P11	Rachel Orfila		October 21, 2022
P12	Jean Albrick		October 22, 2022
P13	Jack Reed		October 23, 2022
P14	Charles W. Ben		October 23, 2022
P15	Tanner Vandebosch		October 24, 2022
P16	Michael Smith		October 24, 2022
P17	Lynn Miller		October 24, 2022
P18	Joshua Rangel		October 24, 2022
P19	Mark Staples		October 24, 2022
P20	Ding Kalis		October 24, 2022
P21	Sarah Back		October 24, 2022
P22	Cat Nick		October 24, 2022
P23	Chase Paules		October 24, 2022
P24	Stephanie Pincetl		October 24, 2022
P25	Neil Larsen		October 24, 2022
P26	Matt Schodorf		October 24, 2022
P27	David Fried		October 24, 2022
P28	Michael Bauer		October 25, 2022
P29	Yasmin Grewal-Kok		October 25, 2022
P30	Mark Whitney		October 25, 2022
P31	Samantha Smith		October 25, 2022
P32	Kyle Martin		October 25, 2022
P33	Robert Smolkin		October 26, 2022
P34	Steve Cokonis		October 26, 2022
P35	Neal Roscoe		October 26, 2022
P36	Tami Kagan-Abrams		October 26, 2022
P37	Grant Blakeman		October 27, 2022
P38	Matthew Mier		October 28, 2022
P39	<i>Comment number intentionally skipped</i>		

Letter	Name (title)	Organization/Address	Date of Letter
P40	Abe Ahn		October 30, 2022
P41	Perrin Shannon		November 7, 2022
P42	Carleigh Shannon		November 7, 2022
P43	Katharina Schmitz	Doppelmayr USA	November 9, 2022
P44	Darren Howell		November 15, 2022
P45	Jeffrey Holmes		November 15, 2022
P46	Jack Humphreville		November 16, 2022
P47	Julia Tauscher		November 17, 2022
P48	Bill Przylucki		November 17, 2022
P49	Faraz Aqil		November 19, 2022
P50	Greg Camphire		November 23, 2022
P51	Daniel Freedman		November 23, 2022
P52	Marceline Phillips		November 28, 2022
P53	Martin Hoecker-Martinez		November 28, 2022
P54	Baldomero Capiz		November 17, 2022
P55	Ruby Andalon		November 17, 2022
P56	Rebecca Ocegueda		November 17, 2022
P57	Maria Yglesias		November 17, 2022
P58	Arturo Gonzalez		November 17, 2022
P59	Kevin Jauregui		November 17, 2022
P60	Julie Rico		November 17, 2022
P61	Patrick Chen		November 17, 2022
P62	Davanna Molinari		November 17, 2022
P63	Bill Chin		November 17, 2022
P64	Frank Hom		November 17, 2022
P65	Raul Macia & Francisco Serrano		November 18, 2022
P66	Herminia G. Andrade		November 17, 2022
P67	Alan K. Weeks		November 17, 2022
P68	Antonio Rodriguez		November 17, 2022
P69	Samuel Perez		September 17, 2022
P70	Ci Zhang Maory		November 17, 2022
P71	Ramon Cruz Moya		November 17, 2022
P72	Joseph Amaral		November 17, 2022
P73	Daniel Andalon		November 18, 2022
P74	Chace Espinosa		November 30, 2022
P75	Franco Stefano Blancaflor		November 30, 2022
P76	Jacob Lopez		November 30, 2022
P77	DJ Gonzalez		November 30, 2022
P78	Xavier Garcia		November 30, 2022
P79	Cayla McCrae		December 1, 2022
P80	Thomas Lemos		December 1, 2022
P81	Marissa Roy		December 1, 2022
P82	Tabatha Yelos		December 1, 2022
P83	Logan Rapp		December 1, 2022
P84	Amy Gatto		December 1, 2022
P85	Akio Katano		December 1, 2022
P86	Timothy Hayes		December 1, 2022
P87	Anthony Weiss		December 2, 2022
P88	Betty Dumas-Toto		December 2, 2022
P89	Eli Jacobovitz		December 2, 2022
P90	Jennifer Lei		December 2, 2022

Letter	Name (title)	Organization/Address	Date of Letter
P91	Melody McBride		December 2, 2022
P92	Gizelle V zquez		December 2, 2022
P93	Dylan Kirk		December 2, 2022
P94	Cole Barrios		December 2, 2022
P95	Ashley Harmon		December 2, 2022
P96	Annie Freiermuth		December 2, 2022
P97	Peter Kwong		December 3, 2022
P98	Ben Kolstad		December 6, 2022
P99	Ray Melendez		December 6, 2022
P100	Micah Enloe		December 6, 2022
P101	Steve Mirkin		December 7, 2022
P102	Edgar Mendez		December 7, 2022
P103	Gabriella Nieves		December 7, 2022
P104	Wendy Whitcup		December 7, 2022
P105	Phyllis Ling		December 7, 2022
P106	Jack Tovar		December 7, 2022
P107	Nancy Hoven		December 8, 2022
P108	Miguel Nisthal		December 8, 2022
P109	Mike Connors		December 8, 2022
P110	Karin Costello		December 8, 2022
P111	Ben Park		December 9, 2022
P112	Desmond Bliek		December 9, 2022
P113	Ovo Xxx		December 9, 2022
P114	Hugo Garcia		December 9, 2022
P115	Phyllis Ling		December 9, 2022
P116	Schena Rourk		December 10, 2022
P117	Christian D. Nívar		December 10, 2022
P118	Celeste Salazar		December 10, 2022
P119	Anna Menedjian		December 10, 2022
P120	Casa Wilson		December 10, 2022
P121	Renee Young		December 11, 2022
P122	Katherine Chrisman		December 11, 2022
P123	Daren Cole, President	Leitner-Poma of America, Inc.	December 11, 2022
P124	Lauren Fortner		December 12, 2022
P125	Tara Kays		December 12, 2022
P126	Jessica Wong		December 12, 2022
P127	Abraham Mercado		December 12, 2022
P128	Min Polley		December 12, 2022
P129	Sharon Coleman		December 13, 2022
P130	Navid Nakhaee		December 13, 2022
P131	Alejandro Herrera		December 13, 2022
P132	Michelle Liu		December 03, 2022
P133	Juniper Wong		December 14, 2022
P134	Desiree Lenart		December 14, 2022
P135	Jorge Leandros Tovar		December 14, 2022
P136	Diane Weiss		December 15, 2022
P137	Miguel Haro Jr.		December 15, 2022
P138	Veronica Corona		December 16, 2022
P139	Jay Adriano		December 16, 2022
P140	A. Catherine Norian, DLA Piper LLP	Chinatown Station Owner, LLC	December 16, 2022
P141	Bill Haller		December 17, 2022

Letter	Name (title)	Organization/Address	Date of Letter
P142	Justin Carrus		December 17, 2022
P143	Nidhi Nikhanj		December 18, 2022
P144	Jasvinder Bawa		December 18, 2022
P145	Ralph Levinson		December 18, 2022
P146	Susan Levinson		December 18, 2022
P147	Brenda Nuyen		December 19, 2022
P148	Dylan Sittig		December 20, 2022
P149	Daniel Liu		December 19, 2022
P150	Amy Hammond		December 19, 2022
P151	Jodi Sklawer		December 19, 2022
P152	Carolyn Weyant		December 20, 2022
P153	Aronriti Mey		December 7, 2022
P154	YueHan Kuang		December 9, 2022
P155	HZ Liu Zhang		December 7, 2022
P156	Chuong Zin Bo		December 7, 2022
P157	George Lui		December 7, 2022
P158	Sher Yuek Tan		December 7, 2022
P159	Huang Jing		December 7, 2022
P160	Qing HNG		December 7, 2022
P161	RM HU		December 7, 2022
P162	Qui Lui		December 7, 2022
P163	Za Ling Zi		December 7, 2022
P164	Yi Yang		<i>No date</i>
P165	Wu Xiong Lui		December 7, 2022
P166	Rui Fang Feng		November 7, 2022
P167	Guohui Li		December 7, 2022
P168	Li Jun Yue		December 7, 2022
P169	Annie Ma		December 7, 2022
P170	Jose Silva		December 7, 2022
P171	Kiet Tsan		November 7, 2022
P172	Alex Diaz		November 9, 2022
P173	Elena		September 12, 2022
P174	Maria Baeza		September 12, 2022
P175	Choo Hue Ling		<i>No date</i>
P176	Wences Sanchez		December 9, 2022
P177	Isabel Dimas		December 9, 2022
P178	Araceli Morales		December 9, 2022
P179	Disraeli Butler		December 9, 2022
P180	Maria Alvarez		December 9, 2022
P181	Louie Chan		December 9, 2022
P182	Amparo Cabrera		December 9, 2022
P183	Socorro Lugo		December 9, 2022
P184	Lan To		December 9, 2022
P185	Sandra Sedano		December 9, 2022
P186	Marta Prieto		December 9, 2022
P187	Kin Tsan		December 7, 2022
P188	Edward Elias		December 7, 2022
P189	Edgar Ramos		December 7, 2022
P190	Wendy Ortiz		December 7, 2022
P191	Nazario Arreola		<i>No date</i>
P192	Mariana Gomez		December 9, 2022

Letter	Name (title)	Organization/Address	Date of Letter
P193	Karina		December 7, 2022
P194	Gustavo Gonzalez		December 7, 2022
P195	Taylor Nichols		December 22, 2022
P196	Mitchell Mom		December 23, 2022
P197	Francis Hayes		December 29, 2022
P198	Jennifer Cuevas		December 30, 2022
P199	Allen Mom		December 31, 2022
P201	Jay de la Torre		January 4, 2023
P202	Derrick Davis		January 4, 2023
P203	Jennifer Lee		January 4, 2023
P204	Peter Saudino		January 4, 2023
P205	Brian Herrera		January 4, 2023
P206	Veronica L.		January 5, 2023
P207	Nathaniel Ortiz		January 3, 2023
P208	Peter Shek		January 6, 2023
P209	Peter Shek		January 6, 2023
P210	Jean Brandt		January 6, 2023
P211	Kristen Wo		January 6, 2023
P212	Andrea Valverde		January 6, 2023
P213	Manori Sumanasinghe		January 6, 2023
P214	Reagan McClymonds		January 6, 2023
P215	Thomas Britt		January 6, 2023
P216	Hayley Marcus		January 6, 2023
P217	Nancy Hoven		January 6, 2023
P218	Ann Dorsey		January 6, 2023
P219	Janna Wheeler		January 6, 2023
P220	Kate Wolf		January 6, 2023
P221	Polonia		January 6, 2023
P222	Jean Brandt		January 7, 2023
P223	Paul Newman		January 7, 2023
P224	Lance Paris		January 7, 2023
P225	Elizabeth Codiga		January 7, 2023
P226	Nelson Abreu		January 7, 2023
P227	Mary Koetting		January 7, 2023
P228	Catherine Wu		January 7, 2023
P229	Emily Moncata		January 8, 2023
P230	Bert Glatstein		January 8, 2023
P231	Jamie Patterson		January 9, 2023
P232	Jane O'Neill		January 9, 2023
P233	Laurel Randolph		January 9, 2023
P234	Jill Stevens		January 9, 2023
P235	Dorothy Braudy		January 9, 2023
P236	Max Maslansky		January 9, 2023
P237	Julie Williams		January 9, 2023
P238	Aristotle Acevedo		January 9, 2023
P239	Kama Hayes		January 10, 2023
P240	Christian Arana		January 10, 2023
P241	Dylan Sittig		January 10, 2023
P242	Aaron Y		January 10, 2023
P243	Daniel Samiljan		January 10, 2023
P244	William Campbell		January 10, 2023

Letter	Name (title)	Organization/Address	Date of Letter
P245	Nicholas De Dominic		January 10, 2023
P246	Tyler Tharp		January 10, 2023
P247	Andrew Mueth		January 10, 2023
P248	Jules Cote		January 10, 2023
P249	Sophie Li		January 11, 2023
P250	Kate Wolf		January 9, 2023
P251	Sarajo Frieden		January 11, 2023
P252	Bob Vanderet		January 11, 2023
P253	Tom Williams		January 11, 2023
P254	Gloria Ramirez		January 11, 2023
P255	Melissa Arechiga		January 13, 2023
P256	Carol Ng		January 13, 2023
P257	Mary Livesay		January 13, 2023
P258	Kaitlyn Brine		January 13, 2023
P259	Ricky de Laveaga		January 14, 2023
P260	<i>Comment number intentionally skipped</i>		
P261	Rahul Gunasekaran		January 14, 2023
P262	Holly Harper		January 14, 2023
P263	Carey Bennett		January 14, 2023
P264	Hayk Makhmuryan		January 14, 2023
P265	Freda Shen		January 15, 2023
P266	Zach		January 14, 2023
P267	The Burgard Family		January 15, 2023
P268	Sara Z Mijares		January 15, 2023
P269	Ezra Muthiah		January 15, 2023
P270	Tom Zhang		January 15, 2023
P271	Tiff H		January 15, 2023
P272	Jacqueline Pabst		January 15, 2023
P273	David Shorter		January 15, 2023
P274	Grace Doyle		January 15, 2023
P275	Bryan Bosque		January 15, 2023
P276	Kim Reyes		January 16, 2023
P277	Nick Scotttrussell		January 15, 2023
P278	Liliana Cortez		January 15, 2023
P279	Jaime Zavala		January 15, 2023
P280	Kassandra Zepeda		January 15, 2023
P281	Dennis Rohatyn		January 15, 2023
P282	Suellen Wagner		January 16, 2023
P283	Ric Romero		January 16, 2023
P284	Sara Z. Mijares		January 15, 2023
P285	Brad Bain		January 10, 2023
P286	Xulan		January 3, 2023
P287	Dale Brandenburg		December 26, 2022
P288	Crystal Hernandez		December 13, 2022
P289	Geri Foye		December 12, 2022
P290	Martin Campos		December 13, 2022
P291	Elizabeth Usruitia		December 13, 2022
P292	Danielle Montoya		December 13, 2022
P293	Iris J Ramirez		December 13, 2022
P294	Jade Castillo		December 13, 2022
P295	David Sanchez		December 14, 2022

Letter	Name (title)	Organization/Address	Date of Letter
P296	Enrique Robles		December 14, 2022
P297	Norma Sanchez		December 14, 2022
P298	Maria		December 14, 2022
P299	Guadalupe Rabadau		December 14, 2022
P300	Alejandro		December 14, 2022
P301	Bertha Garcia		December 14, 2022
P302	Noelo Heese		December 14, 2022
P303	Kimberly Drenas		January 8, 2023
P304	Andrew Inema		January 8, 2023
P305	Tina Robles		January 4, 2023
P306	Manuel Cruz		December 15, 2022
P307	Arleen Rivera		December 15, 2022
P308	Jose Sanchez		December 15, 2022
P309	Diane Brown		December 15, 2022
P310	Helen Hurtado		December 15, 2022
P311	Aleena Cruz		December 15, 2022
P312	Jorge Hurtado		December 15, 2022
P313	Rachel Sanchez		December 15, 2022
P314	Monica Cruz		December 15, 2022
P315	Mary Jo Cruz		December 15, 2022
P316	Danny Rivera		December 15, 2022
P317	Yolanda Garza		December 16, 2022
P318	Monique Bracamontes		December 16, 2022
P319	Eric Bracamontes		December 16, 2022
P320	Anel Becerra		December 16, 2022
P321	Arturo Ortiz		December 16, 2022
P322	Eleda de Anda		December 16, 2022
P323	Jennie Rubio		December 16, 2022
P324	Brian Rubio		December 16, 2022
P325	Emma Aguila		December 16, 2022
P326	Jason Seguda		December 16, 2022
P327	Patuel Montanez		December 16, 2022
P328	Vincent Ruilla		December 16, 2022
P329	Martha Garcia		December 15, 2022
P330	Adam Reeves		December 12, 2022
P331	Martha Contreras		December 12, 2022
P332	Rupert Jones		December 12, 2022
P333	Imelda Morales		December 12, 2022
P334	Fatima Lopez		December 13, 2022
P335	Javon Newman		December 13, 2022
P336	Alexander Black		December 13, 2022
P337	Linda Chen		December 13, 2022
P338	Amy Matthews		December 13, 2022
P339	Jesus Villanueva		December 13, 2022
P340	Clarissa Paredes		December 14, 2022
P341	Simon Lopez		December 14, 2022
P342	Spencer Rites		December 14, 2022
P343	Kaylee Smith		December 14, 2022
P344	Robert Slack		December 14, 2022
P345	Juliette Lopez		December 14, 2022
P346	Justine Lee		December 14, 2022

Letter	Name (title)	Organization/Address	Date of Letter
P347	Jason Ramirez		December 15, 2022
P348	Marissa Cortes		December 15, 2022
P349	Lesley Gomez		December 15, 2022
P350	Cindy Maciel		December 15, 2022
P351	Destiny Cruz		December 16, 2022
P352	Amber Cervantes		December 16, 2022
P353	Callie Liley		December 16, 2022
P354	Mariposa Jimenez		December 16, 2022
P355	Victor Balderrama		December 16, 2022
P356	Leticia Reynoso		December 12, 2022
P357	Raymond Noriega		December 12, 2022
P358	Leslie Reynoso		December 12, 2022
P359	Angela Reynoso		December 12, 2022
P360	Celeste Revills		December 12, 2022
P361	Efrain Hernandez		December 12, 2022
P362	Gustavo Hernandez		December 12, 2022
P363	Maria Hernandez		December 12, 2022
P364	Tanya Hernandez		December 12, 2022
P365	Carlos		December 13, 2022
P366	Carlos Aguirre		December 13, 2022
P367	Juan Garcia		December 13, 2022
P368	Yvonne Montoya		December 13, 2022
P369	Anson Li		January 8, 2023
P370	Amy Li		January 8, 2023
P371	Joanne Liu		January 8, 2023
P372	Diana Chen		December 7, 2022
P373	Lyn Chan		December 7, 2022
P374	Marina Chen		January 8, 2023
P375	Lyn Chan		January 8, 2023
P376	Leo Lei		January 8, 2023
P377	Ling		January 8, 2023
P378	Wu Ainne		January 8, 2023
P379	S. Li		January 8, 2023
P380	Angela Chan		January 8, 2023
P381	Kelly		January 8, 2023
P382	Cynthia Lu		January 8, 2023
P383	Kenny Phu		January 8, 2023
P384	Bruce Wong		January 8, 2023
P385	Elaine Cao		January 8, 2023
P386	Xiu Wei Deng		January 8, 2023
P387	Lily		January 8, 2023
P388	C. K. Ko		January 8, 2023
P389	Qingxia Cen		January 8, 2023
P390	Yiyan Situ		January 8, 2023
P391	Su Chan Li		January 8, 2023
P392	Wai Li Kuan		January 8, 2023
P393	Bing Yang Situ		January 8, 2023
P394	Li Shao Xie		January 8, 2023
P395	Xianen Bai		January 8, 2023
P396	Lan Huang		January 8, 2023
P397	Jie Tang Zhou		January 8, 2023

Letter	Name (title)	Organization/Address	Date of Letter
P398	Guohui Li		January 8, 2023
P399	Rui Fang Feng		December 10, 2022
P400	Daniel Rubio		December 9, 2022
P401	Judy Abarca		December 12, 2022
P402	Teresa Villa		December 12, 2022
P403	Ana C. Sorto		December 12, 2022
P404	Maria Orozco		December 12, 2022
P405	Roberto Vucio		December 12, 2022
P406	Jose Flores		December 12, 2022
P407	Rosaura Ulloa		December 12, 2022
P408	Guillermina Martinez Hernandez		December 13, 2022
P409	Trinidad Zesate		December 13, 2022
P410	Evangelina Zesate		December 13, 2022
P411	Elizabeth Acevedo		December 14, 2022
P412	Jessica Suarez		December 14, 2022
P413	Reina Rodriguez		December 14, 2022
P414	Maria Martinez		December 14, 2022
P415	Mariol Ojeda		December 15, 2022
P416	Maria Areola		December 15, 2022
P417	Alicia Ojeda		December 15, 2022
P418	Manina Huna		December 15, 2022
P419	Carifina Caro		December 15, 2022
P420	Maria Mosqueda		December 15, 2022
P421	Barbara Da		December 15, 2022
P422	Ricardo Garcia		December 15, 2022
P423	Isabel Hernandez		December 15, 2022
P424	Jose Leja		December 7, 2022
P425	Gloria Tucay		December 8, 2022
P426	Victoria Tucay		December 8, 2022
P427	Breeana Ramos		December 8, 2022
P428	Jenny Rivera		December 8, 2022
P429	Jennifer Huerta		December 8, 2022
P430	Sofia Rivera		December 13, 2022
P431	Lisa Villarreal		December 8, 2022
P432	Rojelio Esperanza		December 8, 2022
P433	Gladys Torry		December 7, 2022
P434	Maria Vargas		December 14, 2022
P435	Ramona Gonzalez		December 14, 2022
P436	Yadira Quintero		December 14, 2022
P437	Maria A Coulveros		December 14, 2022
P438	Martina Zuniga		December 14, 2022
P439	Cristian Mara		December 15, 2022
P440	Araceli Rico		December 16, 2022
P441	Jesus Rico		December 16, 2022
P442	Pablo Covarrubias		December 16, 2022
P443	Teresa Covarrubias		December 16, 2022
P444	Viet Tsan		December 10, 2022
P445	Kin Tsan		December 10, 2022
P446	Qun Hua He		December 10, 2022
P447	Maribel Precead		December 10, 2022
P448	Kio Chi Ye		December 10, 2022

Letter	Name (title)	Organization/Address	Date of Letter
P449	Liping Ma		December 10, 2022
P450	Amie Wu		January 10, 2023
P451	Tay Saek You		December 10, 2022
P452	Huang		December 10, 2022
P453	Huang Im Bo		December 10, 2022
P454	Hu Liu Zhang		December 10, 2022
P455	Qing Hing		December 10, 2022
P456	Ruo Shun Hu		December 10, 2022
P457	Ming Hui Liu		December 10, 2022
P458	Zahira Yacoub		January 10, 2023
P459	Susannah Lowber		January 10, 2023
P460	Andy Wong		January 10, 2023
P461	Andrew Beck		January 11, 2023
P462	Adrian Herrera Jr.		January 11, 2023
P463	Jacqueline Lam		January 10, 2023
P464	Jacqueline Lam		January 10, 2023
P465	Hillary Barker		January 10, 2023
P466	Margaret Reardon		January 13, 2023
P467	Robert Brunson		January 13, 2023
P468	Ben Wendel		January 14, 2023
P469	Kathie Tetreault		January 12, 2023
P470	Vicki & Steve Rank		January 13, 2023
P471	Veronica L.		January 12, 2023
P472	Judy Kameon		January 12, 2023
P473	Kya-Marina Le		January 13, 2023
P474	Crystal Cantoran		January 12, 2023
P475	Kanaka Luna		January 12, 2023
P476	John Clement		January 12, 2023
P477	Erica Carlos		January 12, 2023
P478	Louie Mora		January 12, 2023
P479	Roxanna Rendon		January 12, 2023
P480	Vanessa Abrego		January 12, 2023
P481	Nanci Ochoa		January 12, 2023
P482	Jessica Sanchez		January 12, 2023
P483	Camille Suarez, Ph.D.		January 12, 2023
P484	Ester Gonzales		January 12, 2023
P485	Michelle Montenegro		January 12, 2023
P486	Caylin G		January 12, 2023
P487	Gabriela Rosales		January 12, 2023
P488	Ricky de Laveaga		January 12, 2023
P489	Ana Silva		January 12, 2023
P490	Kelle Leonard		January 12, 2023
P491	Petrona Garcia		December 30, 2022
P492	Porsha Pearson		December 30, 2022
P493	Armando Ruiz		December 30, 2022
P494	Laura Hayes		December 30, 2022
P495	Donna Harati		December 30, 2022
P496	Jennifer Rodriguez		December 30, 2022
P497	Liliana Cortez		January 13, 2023
P498	James Martin		January 13, 2023
P499	Jana Rosenblatt		January 13, 2023

Letter	Name (title)	Organization/Address	Date of Letter
P500	Susan Durbin		January 4, 2023
P501	Keiko Utsumi		January 16, 2023
P502	Katherine Chi		January 16, 2023
P503	Sean Mason		January 16, 2023
P504	Sang Wong		January 16, 2023
P505	Michelle Fong		January 16, 2023
P506	Erik Otsea		January 16, 2023
P507	Cameron McManus		January 16, 2023
P508	Nancy De Los Santos Reza		January 16, 2023
P509	Andrew Ko		January 16, 2023
P510	Douglass Abramson		January 16, 2023
P511	LA Parks Alliance	LA Parks Alliance 1855 Industrial Street, #106 Los Angeles, CA 90021	January 16, 2023
P512	640 N. Broadway	640 N Broadway Los Angeles, CA	September 13, 2022
P513	652 N. Broadway	652 N Broadway, Los Angeles, CA	September 13, 2022
P514	Ching Je		September 13, 2022
P515	Kun G Leon		September 13, 2022
P516	Ling Ling		September 13, 2022
P517	Eduardo F. Rosario		September 14, 2022
P518	Geoff Kia Miller		September 14, 2022
P519	Virginia Pinedo		January 16, 2023
P520	Linda Glatstein		January 16, 2023
P521	Julian Engin		January 16, 2023
P522	Andrea Harrow		January 16, 2023
P523	Kathryn Reno		January 16, 2023
P524	Kathleen Rogers		January 16, 2023
P525	Phyllis Ling		January 16, 2023
P526	Gabe Lee		January 16, 2023
P527	Kris Chan		January 16, 2023
P528	Katie Wang		January 16, 2023
P529	Kenny Chan		January 16, 2023
P530	Elba Yanyez		January 16, 2023
P531	Xochitl Manzanilla		January 16, 2023
P532	Tam Po Tien		January 16, 2023
P533	Jose Estrada		January 16, 2023
P534	Amy Ho		January 16, 2023
P535	Melissa Arechiga		January 16, 2023
P536	Victoria Steele		January 16, 2023
P537	Julie Chow		January 16, 2023
P538	Li Wei Huang		January 16, 2023
P539	Ne Huang Hom		January 16, 2023
P540	Alejandra Flores		January 16, 2023
P541	Bob Hanisee		January 16, 2023
P542	Kimberly Turner		January 16, 2023
P543	Brenda Zhang		January 16, 2023
P544	Chrysa Kovach		January 16, 2023
P545	Jane Chow		January 16, 2023
P546	Phyllis Chiu		January 16, 2023

Letter	Name (title)	Organization/Address	Date of Letter
P547	Andrew Yip		January 16, 2023
P548	Renee Tajima		January 16, 2023
P549	Bridget McCarthy		January 16, 2023
P550	Rehyan Rivera		January 16, 2023
P551	Samantha Eddo		January 16, 2023
P552	Jonathan Berman		January 16, 2023
P553	Roger Ly		January 17, 2023
P554	Will Cepeda		January 17, 2023
P555	Buck Wong		January 17, 2023
P556	Renee Pizana		January 17, 2023
P557	Phyllis Muro		January 17, 2023
P558	Adrian Quezada		January 16, 2023
P559	Catherine Sanford		December 8, 2022
P560	Mary Ramos		December 8, 2022
P561	Benson Lai		December 8, 2022
P562	Jennie Limaeya		December 8, 2022
P563	Nieke Gaston		December 7, 2022
P564	Brenda Anohy Hernandez		December 8, 2022
P565	Janis Yue		December 8, 2022
P566	Gordon Lai		December 8, 2022
P567	Marina		December 8, 2022
P568	Jacob Woode		December 7, 2022
P569	Victoria Steele		December 8, 2022
P570	Khinn Ung		December 6, 2022
P571	Oralia Barrios		December 8, 2022
P572	Charlemae Smith		December 8, 2022
P573	Ricardo S Haus		December 8, 2022
P574	David Chueng		December 8, 2022
P575	Tiang Liu		December 8, 2022
P576	Lydia Rebecca Hernandez		December 7, 2022
P577	Teri Vanderberg		December 7, 2022
P578	Sien Ank Mac		December 8, 2022
P579	Jin Tian L		December 8, 2022
P580	Yau Hing Leung		December 8, 2022
P581	Kit Ma Yge		December 8, 2022
P582	Yu Fen Tan		December 8, 2022
P583	Cheng Yee Wong		December 8, 2022
P584	Ellie Tham		December 8, 2022
P585	Lam Ngoc Anh		December 8, 2022
P586	Rosario Hernandez		December 7, 2022
P587	Nancy Ramirez		December 8, 2022
P588	Melissa Reyes		December 8, 2022
P589	Monica Ruiz		December 7, 2022
P590	Casey Maddren		January 17, 2023
P591	Lydia Moreno		January 17, 2023
P592	Elvin Vu		January 17, 2022
P593	Angela Davis		January 17, 2023
P594	Anna Gruben		January 17, 2023
P595	Valerie Veator		January 17, 2023
P596	Michael Steinborn		January 17, 2023
P597	Lydia M Garcia		January 17, 2023

Letter	Name (title)	Organization/Address	Date of Letter
P598	Jacqueline Calvache		January 17, 2023
P599	Isabel Frampton Wade		January 17, 2023
P600	David Michel		January 17, 2023
P601	Lauren Woodrow		January 17, 2023
P602	Naoko Ward		January 17, 2023
P603	Alexandra Abdel-Malek		January 17, 2023
P604	Paul Guijarro		January 17, 2023
P605	Nina Kagan		January 17, 2023
P606	Rachel Sumekh		January 17, 2023
P607	Victoria Steele		January 17, 2023
P608	Yee Ting Huang		January 17, 2023
P609	Brian Smee		January 17, 2023
P610	Nadia Taha		January 17, 2023
P611	Alan Pena		January 17, 2023
P612	Gabriela Davidson-Gomez		January 17, 2023
P613	Ned Teitelbaum		January 17, 2023
P614	Xavier Flores		January 15, 2023
P615	Bella Martinez		January 15, 2023
P616	Vicky Barahona		January 15, 2023
P617	Guadalupe Vasquez		January 15, 2023
P618	Aracely Martinez		January 15, 2023
P619	Arturo Perez		January 15, 2023
P620	Carlos Sanchez		January 14, 2023
P621	Vilma Medric		January 14, 2023
P622	Saul Cruz		January 14, 2023
P623	Norma Ramirez		January 14, 2023
P624	Jesus Ruiz		January 14, 2023
P625	Katherine Rivera		January 13, 2023
P626	Adrian Montoya		January 13, 2023
P627	Luis Olalde		January 13, 2023
P628	Mary Mares		January 13, 2023
P629	Yvonne Montoya		January 13, 2023
P630	Danielle Montoya		January 13, 2023
P631	Elizabeth Urrutia		January 13, 2023
P632	Celeste Savor		January 14, 2023
P633	Norma Robles		January 15, 2023
P634	Tina Robles		January 15, 2023
P635	Geraldine Foye		January 16, 2023
P636	Elida De Anda		January 16, 2023
P637	Emma Aguilar		January 16, 2023
P638	Brian Rubio		January 16, 2023
P639	Jennie Rubio		January 16, 2023
P640	Victor Aguilar		January 16, 2023
P641	Linda Garcia		January 16, 2023
P642	Rogelio Salazar		January 16, 2023
P643	Debra Sosa		January 16, 2023
P644	Lucy Quevedo		January 16, 2023
P645	Mary Urrutia		January 16, 2023
P646	Roxana Duran		January 16, 2023
P647	Luis Reynoso		January 16, 2023
P648	Daisy Reynoso		January 16, 2023

Letter	Name (title)	Organization/Address	Date of Letter
P649	Angela Reynoso		January 16, 2023
P650	Raymond Noriega		January 16, 2023
P651	Leticia Reynoso		January 16, 2023
P652	Leslie Reynoso		January 16, 2023
P653	Silvano Reynoso		January 16, 2023
P654	Zhang		January 17, 2023
P655	Zheng		January 17, 2023
P656	Chris Barry		January 17, 2023
P657	Ken Wong		January 17, 2023
P658	Amanda Cotylo		January 17, 2023
P659	Eddie Barranza		January 17, 2023
P660	Brandon Gibbons		January 17, 2023
P661	Danny Orellana		January 17, 2023
P662	Lisa Duardo		January 17, 2023
P663	Fa Li Xiao		January 17, 2023
P664	Kikei Wong		January 17, 2023
P665	Rodney Scholtes		January 18, 2023
P666	Diane M. L. Tan		January 18, 2023
P667	Samantha Mohammad		January 17, 2023
P668	Brandy Jimenez		January 17, 2023
P669	Allen Natian		January 17, 2023
P670	Sarah Kate		January 17, 2023
P671	Eric Adams		January 18, 2023
P672	Ashley Evangelista-Mendiola		January 18, 2023
P673	Jennifer Martinez		January 17, 2023
P674	Sherin Bennett		January 18, 2023
P675	Jaime Zavaleta		January 17, 2023
P676	Tabatha Yelos		January 18, 2023
P677	Ron Frank		January 18, 2023
P678	Annalee Harr		January 18, 2023
P679	Tabatha Yelos		January 18, 2023
P680	Valerie Albicker		January 18, 2023
P681	Annalee Harr		January 18, 2023
P682	Jasmine Perez		January 17, 2023
P683	Peter Straus		January 18, 2023
P684	Rainey Chevako		January 18, 2023
P685	Sandra Choi		January 18, 2023
P686	Jose Mancera		January 18, 2023
P687	Phyllis Ling		January 17, 2023
P688	Andy Sklawer		December 20, 2022
P689	G. Smith		January 18, 2023
P690- P699	<i>Comment numbers intentionally skipped</i>		
P700	Phyllis Ling		January 17, 2023
P701	Robert P. Silverstein	S&R Partners, LLC A Riboli Family Company 737 Lamar Street Los Angeles, CA 90031	January 17, 2023

Letter	Name (title)	Organization/Address	Date of Letter
P702	Phyllis Ling Tany Ling Amy Ho Peter Ho Edwin Li Susan Jung Ron Frank Meika Best Angela Cai Mei Yan Cai Xue Nie Yuen Myra Welsh Albert Ho	Savoy Street Los Angeles, CA	January 17, 2023
P703	Yuval Bar-Zemer		January 16, 2023
P704	Don Luis Camacho		January 17, 2023
P705	Colleen Meyers		January 17, 2023
P706	Tany Ling		January 16, 2023
P707	King Cheung		January 18, 2023
P708	Travis Longcore, Ph.D., Principal Catherine Rich, J.D., M.A., Principal	Land Protection Partners P.O. Box 24020 Los Angeles, CA 90024-0020	January 17, 2023
P709	Phyllis Ling		January 17, 2023
P710	Phyllis Ling		January 18, 2023
P711	Miho Murai		January 17, 2023
P712	Phyllis Ling		January 18, 2023
P713	Maria Gritsch TenHouten & Warren D. TenHouten		January 17, 2023
P714	Christopher Roman		January 18, 2023
P715	Xochitl Manzanilla		October 16, 2022
P716	Tany Ling		October 11, 2022
P717	Alex Ward, Architect		October 20, 2022
P718- P729	<i>Comment numbers intentionally skipped</i>		
P730	Charles Robinson		January 16, 2023
P731	Manohla Dargis		January 19, 2023
P732	Justin Dickerson		January 18, 2023
P733	Sara Feldman		January 18, 2023
P734	Nick Marcone, Secretary	Echo Park Neighborhood Council 1226 N. Alvarado Street Los Angeles, CA 90026	January 30, 2023
P735	Thomas R. Savio, Executive Director	Los Angeles Union Station Historical Society (LAUSHS) P.O. Box 411682 Los Angeles, CA 90041	January 17, 2023
P736	Thomas R. Savio, Executive Director	Los Angeles Union Station Historical Society (LAUSHS) P.O. Box 411682 Los Angeles, CA 90041	January 31, 2023
P737	Karina Macias, Senior Deputy, Transportation and Infrastructure	Los Angeles County Supervisor Hilda L. Solis, First District	February 1, 2023
P738	Zab Steenwyk		February 1, 2023

Letter	Name (title)	Organization/Address	Date of Letter
P739	Robert Cole		February 7, 2023
P740	Mara Fisher		January 31, 2023
P741	Sara Clendening, President	Lincoln Heights Neighborhood Council	February 6, 2023
P742	Dennis Rohatyn		February 6, 2023
P743	Douglas P. Carstens	The California Endowment (TCE)	February 7, 2023
P744	Thomas R. Savio, Executive Director	Los Angeles Union Station Historical Society (LAUSHS) P.O. Box 411682 Los Angeles, CA 90041	February 8, 2023
P745	Sunjana Supekar	The California Endowment (TCE)	February 9, 2023
P746	Heather Donnelly		February 9, 2023
P747	Iran Carranza		February 9, 2023
P748	Carey McDonald	Elysian Valley Riverside Neighborhood Council P.O. Box 39522 Los Angeles, CA 90039-0522	August 18, 2023
P749	Amanda Kazen		February 13, 2023
P750	Raul Macias Gloria Medina Veronica Padilla-Campos Maria Patino Gutierrez Betty AvilaNancy Halpern Ibrahim	Stop the Gondola	March 6, 2023
P751	Tony Torres		January 18, 2023
Public Hearing (PH)			
PH1	Xiagtian Xu		December 10, 2022
PH2	Andy Hall		December 10, 2022
PH3	Julie Rico		December 10, 2022
PH4	Miguel Melgoza		December 10, 2022
PH5	Jennie Linheya		December 10, 2022
PH6	Patrick Chen		December 10, 2022
PH7	Rebecca Ocegueda		December 10, 2022
PH8	Esperanza Ramirez		December 10, 2022
PH9	Robert Macias, President	Anahuak Youth Soccer League	December 10, 2022
PH10	Gloria Andrade		December 10, 2022
PH11	Renee Young		December 10, 2022
PH12	Juniper Wong		December 10, 2022
PH13	Bill Chin		December 10, 2022
PH14	Andrew Vought		December 10, 2022
PH15	Marc Futernick		December 10, 2022
PH16	Teri Vanderberg		December 10, 2022
PH17	Douglas Carstens	The California Endowment (TCE)	December 10, 2022
PH18	Kenneth Chan		December 10, 2022
PH19	Jonathan Berman		December 10, 2022
PH20	Baldomero Capiz, President	National Union of Ex Berceros	December 10, 2022
PH21	Maria Elena Padino		December 10, 2022
PH22	Disraely Butler		December 10, 2022
PH23	Tany Ling		December 10, 2022
PH24	Phyllis Ling		December 10, 2022
PH25	Eric Smith		December 10, 2022
PH26	Maria Salnejon		December 10, 2022

Letter	Name (title)	Organization/Address	Date of Letter
PH27	Renee Young, President	National Association of Women Business Owners (NAWBO-LA)	December 10, 2022
PH28	Guan Bao		December 10, 2022
PH29	Andrea Lacaza		December 10, 2022
PH30	Maribel		December 10, 2022
PH31	Fernando Quesada		December 10, 2022
PH32	Simon Fraga		December 10, 2022
PH33	Abram Illescas		December 10, 2022
PH34	Amparo Cabrera		December 10, 2022
PH35	Socorro Lugo		December 10, 2022
PH36	Fang Li Chang		December 10, 2022
PH37	Juniper Wong		December 10, 2022
PH38	Karina Ramos		December 10, 2022
PH39	Gustavo Gonzales		December 10, 2022
PH40	Maria L.		December 10, 2022
PH41	Lucrecia Vargas D.		December 10, 2022
PH42	Claudia Vasquez		December 10, 2022
PH43	Tany Ling		December 10, 2022
PH44	Luis Ramos		December 10, 2022
PH45	Maria Gutierrez		December 10, 2022
PH46	Drew Miller		December 10, 2022
PH47	Disraeli Butler		December 10, 2022
PH48	Dong Lee		December 10, 2022
PH49	Moon Smeyev		December 10, 2022
PH50	Jose Roberto Garela		December 10, 2022
PH51	Juana Noriega		December 10, 2022
PH52	Wences Sanchez		December 10, 2022
PH53	Irine Andalon R.		December 10, 2022
PH54	Jeremiah Arriaga		December 10, 2022
PH55	Jonathan Berman	Cal State US	December 10, 2022
PH56	Bryn Lindblad		December 10, 2022
PH57	Alma R. Melgoza		December 10, 2022
PH58	Lynn Chen	Chinese American Construction Professionals	December 10, 2022
PH59	Patrick Paul Gallego II		December 10, 2022
PH60	Lynn Chen	Earl Security, Inc.	December 10, 2022
PH61	Esperanza Andrade		December 10, 2022
PH62	Sophat Phea		December 10, 2022
PH63	Teri Vanderberg		December 10, 2022
PH64	Rebeca Ocegueda		December 10, 2022
PH65	Julie Rico		December 10, 2022
PH66	Jose Estrada		December 10, 2022
PH67	Maria Lemus		December 10, 2022
PH68	Monica Vazquez		December 10, 2022
PH69	Joshua Neal		December 10, 2022
PH70	Kevin Ho		December 10, 2022
PH71	Maria Avila		December 10, 2022
PH72	Andy		December 10, 2022
PH73	Samuel Maury-Holmes		December 10, 2022
PH74	Mark Edwards		December 10, 2022
PH75	Julie Chow		January 12, 2023
PH76	Hugo Garcia	Save Elephant Hill	January 12, 2023

Letter	Name (title)	Organization/Address	Date of Letter
PH77	L. Spangler		January 12, 2023
PH78	Zhao Can Guan		January 12, 2023
PH79	Matt Hebermehl		January 12, 2023
PH80	L. Meza		January 12, 2023
PH81	Gigi Droesch		January 12, 2023
PH82	Philip Murphy	Friend of Elysian Park	January 12, 2023
PH83	Mark McRae		January 12, 2023
PH84	Margaret Fong		January 14, 2023
PH85	Olali Perez		January 12, 2023
PH86	Sakae Koyama	Friends of Elysian Park	January 12, 2023
PH87	Norvan Gorgi		January 12, 2023
PH88	Guilmar Perdorno	The Wall Las Memorial	January 12, 2023
PH89	Elizabeth		January 12, 2023
PH90	Robert Reyes Villagomez	Housing California	January 12, 2023
PH91	Aaron Thomas		January 12, 2023
PH92	Darlene Escobedo		January 12, 2023
PH93	Katty Rodriguez	Sierra Club LA Chapter	January 12, 2023
PH94	Helen Villagomez		January 12, 2023
PH95	Elva Yanez	Save Elephant Hill	January 12, 2023
PH96	Eugene Pesileon	LATU	January 12, 2023
PH97	Eleanor Bray		January 12, 2023
PH98	Luke Braidizzle		January 12, 2023
PH99	Huang Li Wei		January 12, 2023
PH100	Nazaro Arreola		January 12, 2023
PH101	No Name Given		January 12, 2023
PH102	Chance Menendez		January 12, 2023
PH103	Zhu Yue Li		January 12, 2023
PH104	Wei Lian Tan		January 12, 2023
PH105	Bin Xie		January 12, 2023
PH106	Wu Coi Xia		January 12, 2023
PH107	Qi Guang Chen		January 12, 2023
PH108	Wei An Jhu Yen		January 12, 2023
PH109	Caritina Caro		January 12, 2023
PH110	Grace Bryant		January 12, 2023
PH111	Mary Areola		January 12, 2023
PH112	Luis Herrera		January 12, 2023
PH113	Yi H		January 12, 2023
PH114	Amy Tang		January 12, 2023
PH115	Chiu		January 12, 2023
PH116	H Wu		January 12, 2023
PH117	Liam Ncc		January 12, 2023
PH118	Jesus Leija	The Wall las Memorias	January 11, 2023
PH119	Zhou Jies		January 12, 2023
PH120	Ne Hueng Ho M		January 12, 2023
PH121	Kai M Fong		January 12, 2023
PH122	Sharon		January 12, 2023
PH123	Yun Hoc Thai		January 12, 2023
PH124	Tan		January 12, 2023
PH125	Li Yi Ye		January 12, 2023
PH126	Xiao		January 12, 2023
PH127	Yue Xian Fang	Cathay Manor Apartments	January 12, 2023

Letter	Name (title)	Organization/Address	Date of Letter
PH128	Rhio Shen Hu		January 12, 2023
PH129	Wei Han Tan		January 12, 2023
PH130	Illegible Name		January 12, 2023
PH131	Jennifer Ly		January 12, 2023
PH132	Illegible Name		January 12, 2023
PH133	Shu Ma		January 12, 2023
PH134	Lucy Petrow		January 12, 2023
PH135	Po Wang Knan		January 12, 2023
PH136	Chi Jing Lee		January 12, 2023
PH137	Yang Luong		January 12, 2023
PH138	Illegible Name		January 12, 2023
PH139	Win Am Tim Hui		January 12, 2023
PH140	Hui Qiang Li		January 12, 2023
PH141	Albert Ho		January 12, 2023
PH142	Allen Leon		January 12, 2023
PH143	Cerianne Robertson		January 12, 2023
PH144	Fatima Carrera		January 12, 2023
PH145	Xochitl Manzanilla		January 12, 2023
PH146	Vivi		January 12, 2023
PH147	Li Ping Ma		January 12, 2023
PH148	Yu Hue Chi		December 9, 2022
PH149	Ciro Avila		January 12, 2023
PH150	Cui Lian Wu		January 12, 2023
PH151	Wu Cui Xia		January 12, 2023
PH152	Jasmine Wang		January 12, 2023
PH153	Edwin Li		January 12, 2023
PH154	Luke MacDonald		January 12, 2023
PH155	Casa Wilson		January 12, 2023
PH156	Rachel Day	Rampart Village Neighborhood Council	January 12, 2023
PH157	Maria Elena Patino		January 12, 2023
PH158	Berta Avila		January 12, 2023
PH159	Katie Miles		January 13, 2023
PH160	Rebecca		January 12, 2023
PH161	Gabe Ross		January 12, 2023
PH162	Kevin Giron		January 12, 2023
PH163	Kevin Lau		January 12, 2023
PH164	Jian Ai Li		January 12, 2023
PH165	Jess Gudie		January 12, 2023
PH166	Lai Chiung Mi		January 12, 2023
PH167	Kun Goc Leon		January 12, 2023
PH168	No Name Given		January 12, 2023
PH169	No Name Given		January 12, 2023
PH170	Santiago Vega		January 12, 2023
PH171	Kevin Lau		January 12, 2023
PH172	Kathleen Johnson, Executive Director	Los Angeles River State Park Partners	January 12, 2023
PH173	Olivia Viera, Founder	Indigenous Wellness Collective	January 12, 2023
PH174	Melissa Arechiga		January 12, 2023
PH175	Xiangtian Xu		January 12, 2023
PH176	Chris Gibson		January 12, 2023
PH177	Gabriel Owens-Flores		January 12, 2023

Letter	Name (title)	Organization/Address	Date of Letter
PH178	Xulan Chen		January 12, 2023
PH179	Edwin Li		January 12, 2023
PH180	Chris Hannan	Los Angeles/Orange Counties Building and Construction Trades Council 1626 Beverly Boulevard Los Angeles, CA 90026	January 12, 2023
PH181	Howard Amster		January 12, 2023
PH182	Kevin James	International Union of Operating Engineers, Local # 12	January 12, 2023
PH183	Chris Wilson	Los Angeles County Business Federation (BizFed)	January 12, 2023
PH184	Andrew Vought		January 12, 2023
PH185	Eleanor Bray		January 12, 2023
PH186	Kenneth Chan		January 12, 2023
PH187	Richard Zaldivar		January 12, 2023
PH188	Lee Suan		January 12, 2023
PH189	Anne Freiermuth		January 12, 2023
PH190	William Wong		January 12, 2023
PH191	Judy Chow		January 12, 2023
PH192	Elva Yanez		January 12, 2023
PH193	Jennifer Rodriguez		January 12, 2023
PH194	Miriam Bar-Zemer		January 12, 2023
PH195	Ron Frank		January 12, 2023
PH196	Xochitl Manzanilla		January 12, 2023
PH197	Miho Murai		January 12, 2023
PH198	Marta Woodhull		February 8, 2023
PH199	Chris Hannan	Los Angeles-Orange Counties Building and Construction Trades Council 1626 Beverly Boulevard Los Angeles, CA 90026	February 8, 2023
PH200	Peter Kwan		February 8, 2023
PH201	Gay Yuen		February 8, 2023
PH202	Kris Chan		February 8, 2023
PH203	Eric Adams		February 8, 2023
PH204	Jon Christensen		February 8, 2023
PH205	Maria Flores		February 8, 2023
PH206	Pat Suzak		February 8, 2023
PH207	Sarah Harris		February 8, 2023
PH208	Mark McCrea		February 8, 2023
PH209	Ted Green		February 8, 2023
PH210	Omar Galindo		February 8, 2023
PH211	Gus Torres		February 8, 2023
PH212	Marianna Gatto, Director	Italian American Museum of Los Angeles	February 8, 2023
PH213	Erica Garcia		February 8, 2023
PH214	Alex Alvarez		February 8, 2023
PH215	Ron Frank		February 8, 2023
PH216	Casa Wilson		February 8, 2023
PH217	Katherine Norian	Chinatown Station Owner, LLC	February 8, 2023
PH218	Sunjana Supekar	The California Endowment (TCE)	February 8, 2023
PH219	Jason Fujimoto		February 8, 2023
PH220	Phyllis Ling		February 8, 2023

Letter	Name (title)	Organization/Address	Date of Letter
PH221	Speaker 1		February 8, 2023
PH222	Tan		February 8, 2023
PH223	Speaker 3		February 8, 2023
PH224	Ling Lee		February 8, 2023
PH225	Speaker 4		February 8, 2023
PH226	Sopha Phea		February 8, 2023
PH227	Ernest Lee		February 8, 2023
PH228	Tany Ling		February 8, 2023
PH229	Sakae Koyama		February 8, 2023
PH230	Andy		February 8, 2023
PH231	Rick Garcia		February 8, 2023
PH232	Juniper Wong		February 8, 2023
PH233	Patrick Chen		February 8, 2023
PH234	Amy Ho		February 8, 2023
PH235	Larry Jung		February 8, 2023
PH236	King Cheung		February 8, 2023
PH237	Dana Martinez		February 8, 2023
PH238	Charly Ligety		February 8, 2023
PH239	Joe Rincon		February 8, 2023
PH240	Melanie Bellomo		February 8, 2023
PH241	Alejandro Campillo		February 8, 2023
PH242	Julie Rico		February 8, 2023
PH243	Iran Carranza		February 8, 2023
PH244	Albert Holm		February 8, 2023
PH245	Liliana Cortez		February 8, 2023
PH246	Jennifer Wong		February 8, 2023
PH247	Fernanda Sanchez		February 8, 2023
PH248	Cheng Yang & Yu Hang Tang		February 8, 2023
PH249	Edwin Li		February 8, 2023
PH250	Luis Guerrero		February 8, 2023
PH251	Miguel Castellon		February 8, 2023
PH252	Richard Rojas		February 8, 2023
PH253	Dahma Cho		February 8, 2023
PH254	Billy Yates		February 8, 2023
PH255	Camarillo		February 8, 2023
PH256	Monica		February 8, 2023
PH257	Bill		February 8, 2023
PH258	Angelica		February 8, 2023
PH259	Annie Shaw		February 8, 2023
PH260	Maria Cervantes		February 8, 2023
PH261	Edgar		February 8, 2023
PH262	Lynn Dwyer		February 8, 2023
PH263	Valerie Morishige		February 8, 2023
PH264	Paul Des Marais		February 8, 2023
PH265	Vincent Montago		February 8, 2023
PH266	Melissa Arechiga		February 8, 2023
PH267	Rafael		February 8, 2023
PH268	Ray		February 8, 2023
PH269	Carlos Gomez		February 8, 2023
PH270	Tom Savio		February 8, 2023
PH271	Lisa Duardo		February 8, 2023

Letter	Name (title)	Organization/Address	Date of Letter
PH272	Michael Calareza		February 8, 2023
PH273	Brenda Miramontes		February 8, 2023
PH274	Maria Manzanilla		February 8, 2023
PH275	Jennifer Martinez		February 8, 2023
PH276	Mary		February 8, 2023
PH277	Marlo Cervantes		February 8, 2023
PH278	Ali Rubinfeld		February 8, 2023
PH279	Erik Van Breene	Los Angeles Conservancy	February 8, 2023
PH280	Katherine Christman		December 13, 2022
PH281	Chris Wilson		December 13, 2022
PH282	Mary		December 13, 2022
PH283	Kathleen Johnson		December 13, 2022
PH284	Bill Chen		December 13, 2022
PH285	Elias Garcia		December 13, 2022
PH286	Phyllis Ling		December 13, 2022
PH287	Tabitha		December 13, 2022
PH288	Speaker 18		December 13, 2022
PH289	Speaker 19		December 13, 2022
PH290	Ernest Li		December 13, 2022
PH291	Speaker 21		December 13, 2022
PH292	Wong		December 13, 2022
PH293	King Cheung		December 13, 2022
PH294	Luke MacDonald		December 13, 2022
PH295	Michael		December 13, 2022
PH296	Douglas Carstens	The California Endowment (TCE)	December 13, 2022
PH297	Speaker 27		December 13, 2022
PH298	Jim Starr		December 13, 2022
PH299	Melissa		December 13, 2022
PH300	Michael Chong		December 13, 2022
PH301	Edwin Lee		December 13, 2022
PH302	Alan Weeks		December 13, 2022
PH303	Darryl Saucedo		December 13, 2022
PH304	Speaker 35		December 13, 2022
PH305	Carlos Gomez		December 13, 2022
PH306	Lester		December 13, 2022
PH307	Speakers 40-41		December 13, 2022
PH308	Kayla		December 13, 2022
PH309	Monica Vasquez		December 13, 2022
PH310	Ms. Wong		December 13, 2022
PH311	Jason		December 13, 2022
PH312	Sharon Coleman		December 13, 2022
PH313	Sarah Vande Camp		December 13, 2022
PH314	Bill		December 13, 2022
PH315	Diane Weiss		December 13, 2022
PH316	Drew Miller		December 13, 2022
PH317	Dawn Huang		December 13, 2022
PH318	Carlos		December 13, 2022
PH319	Eric		December 13, 2022
PH320	Monica Cruz		December 13, 2022
PH321	Michael Berg		December 13, 2022
PH322	Alex Alvarez		December 13, 2022

Letter	Name (title)	Organization/Address	Date of Letter
PH323	Speaker 58		December 13, 2022
PH324	Crystal		December 13, 2022
PH325	Ron		December 13, 2022
PH326	Katie		December 13, 2022
PH327	Yeg Lin Wong		January 17, 2023
PH328	Wu Shuo Li		January 17, 2023
PH329	Zhey Wen Zhen		January 15, 2023
PH330	Lorenz G Biyun		January 15, 2023
PH331	Aicui Zhou		January 17, 2023
PH332	Zhou		January 17, 2023
PH333	Wei Mei		January 15, 2023
PH334	Mei Kven Li		January 15, 2023
PH335	Lean Ah Tan		January 15, 2023
PH336	Sean Lee		January 15, 2023
PH337	Lee Suan		January 15, 2023
PH338	Josefina Hanas		January 9, 2023
PH339	Magdalena Luna		January 9, 2023
PH340	Isabel Rios		January 8, 2023
PH341	Maria Ortega		January 8, 2023
PH342	Enrique Luna		January 9, 2023
PH343	Bertha Magona		January 7, 2023
PH344	Arcaceli Rico		January 9, 2023
PH345	Alicia Garcia		January 7, 2023
PH346	Jesus Rico		January 9, 2023
PH347	Andrea Hernandez		January 7, 2023
PH348	Bertha		January 7, 2023
PH349	Rosa Juarez		January 16, 2023
PH350	Maribel Aceves		January 16, 2023
PH351	Karen Alfaro		January 16, 2023
PH352	Saul Duran		January 16, 2023
PH353	Angel Ruiz		January 16, 2023
PH354	Stephanie		January 16, 2023
PH355	Alexis Cuevas		January 16, 2023
PH356	Manuel Antonio Vasquez		January 17, 2023
PH357	Alfredo Gutierrez		January 16, 2023
PH358	Cynthia Gutierrez		January 16, 2023
PH359	Alicia Jimenez		January 15, 2023
PH360	Aquiles Castino		January 15, 2023
PH361	Jose Luis Ramos		January 15, 2023
PH362	Giovanni Duran		January 15, 2023
PH363	Edith Salmeron		January 15, 2023
PH364	Elena Garcia		January 15, 2023

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6.2 TOPICAL RESPONSES

TOPICAL RESPONSE A

SB 44

Comments on the Draft EIR address the proposed Project’s consistency with Senate Bill (“SB”) 44. Comments regarding SB 44 do not raise substantive issues on the content of the Draft EIR and therefore no response is required pursuant to CEQA. Nevertheless, this topical response provides an overview of SB 44’s standards and how the proposed Project is consistent with them for informational purposes.

As discussed in Section 1.4.3, Senate Bill 44, of Section 1.0, Introduction, of the Draft EIR, SB 44 added Section 21168.6.9 to the Public Resources Code to provide for streamlined judicial review for “environmental leadership transit projects.” To qualify for SB 44’s streamlined judicial review process, a project must be an “environmental leadership transit project,” defined as a “fixed guideway” that (i) operates at zero emissions; (ii) reduces GHG emissions in the project’s corridor “as defined in the applicable environmental document over the useful life of the project, without using offsets”; (iii) reduces 30 million vehicle miles traveled in the project’s corridor “as defined in the applicable environmental document over the useful life of the project”; (iv) is consistent with the applicable sustainable communities strategy and regional transportation plan; and (v) incorporates sustainable infrastructure practices.¹

The proposed Project meets each of these standards.

Fixed Guideway

SB 44 states that “fixed guideway” “has the same meaning as defined in Section 5302 of Title 49 of the United States Code.”² Section 5302 of Title 49 of the United States Code includes definitions related to the Federal Transit Administration’s (“FTA”) public transportation programs and policies, including Fixed Guideway Capital Investment Grants (“Section 5309 Grant Program”). Section 5302 defines “fixed guideway” as follows.

The term “fixed guideway” means a public transportation facility—

- (A) using and occupying a separate right-of-way for the exclusive use of public transportation;
- (B) using rail;
- (C) using a fixed catenary system;
- (D) for a passenger ferry system; or
- (E) for a bus rapid transit system.³

¹ California Public Resources Code. 2022. Section 21168.6.9.

² California Public Resources Code. 2022. Section 21168.6.9(a)(2).

³ United States Code. Title 49, Section 5302(7).

Therefore, in order to qualify as a “fixed guideway,” a project must be “public transportation” meeting the statute’s prescribed categories. An expanded discussion of this definition, along with the proposed Project’s consistency with this definition, is provided below.

The Proposed Project Would Operate Daily for Public Service and Is Therefore Public Transportation

As a threshold matter, the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times.

Under Federal law, “[t]he term ‘public transportation’— (A) means regular, continuing shared-ride surface transportation services that are open to the general public or open to a segment of the general public defined by age, disability, or low income; and (B) does not include— (i) intercity passenger rail transportation provided by the entity described in chapter 243 (or a successor to such entity); (ii) intercity bus service; (iii) charter bus service; (iv) school bus service; (v) sightseeing service; (vi) courtesy shuttle service for patrons of one or more specific establishments; or (vii) intra-terminal or intra-facility shuttle services.”⁴

The proposed Project meets this definition because it will be operated at regular, scheduled operating hours and will be open to the general public. As discussed in Section 2.01, Project Overview, of Section 2.0, Project Description, of the Draft EIR:

[The] proposed Project would provide an aerial rapid transit (ART) option for visitors to Dodger Stadium, while also providing access between the Dodger Stadium property, the surrounding communities, including Chinatown, Mission Junction, Elysian Park, and Solano Canyon, and the Los Angeles State Historic Park, to the regional transit system accessible at [Los Angeles Union Station (LAUS)]. . . . The proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Accordingly, the proposed Project would be open to the general public. While there may be some limited circumstances where priority boarding will be given to Dodger ticketholders, the proposed Project will never close to the general public when operating. Further, while the proposed Project may “vary the number of cabins in service and speed throughout the day, based on demand,” just as Metro trains and buses do, the proposed Project will operate under a pre-determined, regular operating hour schedule. Therefore, the proposed Project meets the relevant definition of public transportation for whether it is a “fixed guideway” under Federal law.

In addition, as discussed on page 2-8 in Subsection 2.3.7, Purpose and Need, of the Draft EIR,

[T]he proposed Project would improve mobility and accessibility for the region by providing a daily, high capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. The proposed Project would include a mobility hub at Chinatown/State Park Station. . . [and a] mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park and the surrounding communities.

⁴ United States Code, Title 49, Section 5302(15).

The Proposed Project, as an Aerial Tramway, Is a Fixed Guideway, Consistent with FTA Precedent

The FTA deems “aerial tramways” to be a “fixed guideway.” The proposed Project is an aerial tramway. Therefore, the proposed Project is a “fixed guideway” under SB 44.

In 2004, the FTA described the Section 5309 Grant Program in the federal register and explicitly recognized that aerial tramways are included within the definition of “fixed guideway”:

A “fixed guideway” refers to any transit service that uses exclusive or controlled rights-of-way or rails, entirely or in part. **The term includes** heavy rail, commuter rail, light rail, monorail, trolleybus, **aerial tramway**, inclined plane, cable car, automated guideway transit, ferryboats, that portion of motor bus service operated on exclusive or controlled rights-of-way, and high-occupancy-vehicle (HOV) lanes.⁵

Thus, the FTA considers aerial tramways fixed guideways for the purposes of the definition in Section 5302. Based on the plain language of Section 5302, aerial tramways fall under subpart (A), “using and occupying a separate right-of-way for the exclusive use of public transportation” and subpart (C), “using a fixed catenary system.”

The Proposed Project Would Be Zero Emissions

As described on page 1-4, in Section 1.0, Introduction, of the Draft EIR, under SB 44, the environmental leadership transit project must operate at zero emissions. As discussed on page 1-5, in Section 1.0, Introduction, of the Draft EIR, the proposed Project will operate at zero emissions. The proposed Project guideway is powered by electricity. The electrical power for the proposed Project would be supplied by the City of Los Angeles Department of Water and Power (LADWP) through the utility’s Green Power Program, pursuant to GHG-PDF-A. Battery storage backup will be installed at each station, tower, and the non-passenger junction. Enrollment in LADWP’s Green Power Program and battery back up will reduce GHG emissions and improve air quality. Accordingly, the primary electricity usage associated with the proposed Project guideway would come from renewable resources and result in zero GHG and criteria pollutant emissions, satisfying the requirement to operate at zero emissions. Refer to Section 3.03, Air Quality, and Section 3.08, Greenhouse Gas Emissions, of the Draft EIR which provide additional details on the operational characteristics of the proposed Project that result in zero GHG and criteria pollutant emissions.

The Proposed Project Would Reduce GHG Emissions in the Project’s Corridor

As discussed on page 1-5, in Section 1.0, Introduction, of the Draft EIR, under SB 44, projects under two miles in length must reduce emissions by no less than 50,000 metric tons directly in the corridor of the project defined in the applicable environmental document. The proposed Project, which is less than two miles in length, would reduce emissions by no less than 50,000 metric tons of GHG emissions directly in the Project’s corridor as defined within the EIR over the useful life of the proposed Project, without using offsets. The proposed Project would reduce GHG emissions by 3,493 metric tons of carbon dioxide

⁵ FTA Fiscal Year 2005 Apportionments, Allocations and Program Information, 69 FR 78209-78210 <https://www.govinfo.gov/content/pkg/FR-2004-12-29/pdf/04-28408.pdf> (accessed September 20, 2023).

equivalent per year (MT CO₂e/year) in the buildout year of 2026 and by 6,277 MT CO₂e/year in the horizon year of 2042. Based on an interpolation for the years between 2026 and 2042, and holding the reduction constant after 2042 until 2056, the lifetime emissions of the proposed Project over its useful life (30 years based on SCAQMD's guidance for GHG significance thresholds) would be a reduction of greater than 50,000 metric tons of GHGs at 166,653 MT CO₂e. Therefore, the proposed Project, as a 1.2-mile fixed guideway system, would reduce 50,000 metric tons of GHG emissions in the Project's corridor, satisfying the requirements of Public Resources Code section 21168.6.9(a)(1)(B). Refer to Section 3.08, Greenhouse Gas Emissions, of the Draft EIR, which provides additional details on the proposed Project's expected GHG emissions reductions.

The Proposed Project Would Reduce VMT by at Least 30 Million

As discussed on pages 1-5 and 1-6, in Section 1.0, Introduction of the Draft EIR, the proposed Project would reduce "no less than 30,000,000 vehicle miles traveled in the corridor of the project defined in the applicable environmental document over the useful life of the project," satisfying SB 44's requirement to do so. As detailed in Table 3.17-6 in Section 3.17, Transportation, of the Draft EIR, the proposed Project is forecast to reduce annual VMT by 2,434,000 in the proposed Project's first operational year in 2026, increasing as ridership increases to an annual VMT reduction of 5,067,000 in 2042.

Using the 2026 reduction figures alone, the proposed Project would therefore achieve a minimum of 30,000,000 VMT reduced in approximately 12.3 years. Based on an interpolation for the years between 2026 and 2042, and holding the reduction constant after 2042 until 2056, the lifetime VMT reduction of the proposed Project over its useful life (30 years based on SCAQMD's guidance for GHG significance thresholds) would be a reduction of greater than 30,000,000 VMT at 129,629,500 VMT saved, substantially more VMT saved than is required under Public Resources Code section 21168.6.9(1)(C).

The Proposed Project Is Consistent with the RTP/SCS

As discussed on pages 1-6 through 1-8, in Section 1.0, Introduction, of the Draft EIR, the proposed Project satisfies SB 44's requirement to be consistent with the applicable sustainable communities strategy and alternative planning strategy and the applicable regional transportation plan under Public Resources Code sections 21168.6.9(a)(1)(D) and 21168.6.9(a)(1)(E), respectively. In September 2020, the Southern California Association of Governments approved and fully adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), called Connect SoCal, the applicable sustainable communities strategy and regional transportation plan for the proposed Project. The plan outlines ten main goals, each of which the proposed Project is consistent with. Refer to the table on pages 1-6 to 1-7 in Section 1.0 Introduction, of the Draft EIR for a more detailed discussion of the proposed Project's consistency with these goals.

The proposed Project would provide improved mobility, accessibility, reliability and travel choices for people traveling in Los Angeles to a major event destination (Dodger Stadium), as well as provide improved transit service to adjacent communities. The proposed Project would reduce GHG emissions by reducing VMT. Accordingly, the proposed Project would be consistent with goals in Connect SoCal and is, thus, consistent with the applicable sustainable communities strategy and regional transportation plan, satisfying Public Resources Code sections 21168.6.9(a)(1)(D) and 21168.6.9(a)(1)(E).

The Proposed Project Incorporates Sustainable Infrastructure Practices

As discussed on pages 1-8 and 1-9, in Section 1.0, Introduction, of the Draft EIR, SB 44 requires the Project Sponsor to demonstrate “how it has incorporated sustainable infrastructure practices to achieve sustainability, resiliency, and climate change mitigation and adaptation goals in the project, including principles, frameworks, or guidelines as recommended by one or more of the following: (i) [t]he sustainability, resiliency, and climate change policies and standards of the American Society of Civil Engineers[;] (ii) [t]he Envision Rating System of the Institute for Sustainable Infrastructure; [or] (iii) [t]he Leadership in Energy and Environment Design (LEED) rating system of the United States Green Building Council” (USGBC).

The proposed Project is an innovative and sustainable transit system that provides a sustainable, high-capacity, zero emission aerial rapid transit option for visitors to Dodger Stadium, while also providing access between Dodger Stadium, the surrounding communities, and the regional transit system accessible at LAUS. Aerial rapid transit technology is quiet, minimizing noise and vibration, and the proposed Project would reduce VMT and congestion, leading to reduced GHG emissions and improved air quality.

The proposed Project has been reviewed against the policies and standards of the Envision Rating System of the Institute for Sustainable Infrastructure, as well as USGBC’s LEED for Building Design and Construction and has incorporated sustainability features based on these rating systems. Refer to pages 2-48 through 2-50 in Section 2.0, Project Description of the Draft EIR, for a detailed discussion of the proposed Project’s sustainability features.

Accordingly, pursuant to Public Resources Code section 21168.6.9(a)(1)(F), the proposed Project would incorporate sustainable infrastructure practices to achieve sustainability, resiliency, and climate change mitigation and adaptation goals in the Project, including USGBC’s LEED rating system and the Envision Rating System of the Institute for Sustainable Infrastructure’s policies and standards.

Metro Held All Required Public Meetings for SB 44

SB 44 requires that during the public review period for the Draft EIR, the lead agency hold one “informational workshop to inform the public of the key analyses and conclusions [of the Draft EIR]” within 10 calendar days after the release of the Draft EIR (Pub. Res. Code § 21168.6.9(e)(1)(C)(ii)(3)), and one “public hearing to receive testimony on the [Draft EIR]” within 10 calendar days before the close of the public review period. (*Id.*, § 21168.6.9(e)(1)(C)(ii)(4).)

The Draft EIR was released on October 17, 2022, for a 60-day public review period ending on December 16, 2022. On November 15, 2022, Metro, as the lead agency, extended the public review period an additional 30 days for a 90-day public review period ending on January 17, 2023. During this 90-day public review period, Metro held two informational workshops and three public hearings. In light of disruptions at the third public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held after the close of the public review period to provide an additional opportunity for attendees to provide verbal testimony. Verbal comments made at this fourth public hearing were deemed timely submitted for purposes of the Draft EIR public review period.

Metro Held Two Informational Workshops – SB 44 Requires Only One

While SB 44 only requires one informational workshop within 10 calendar days after the release of the Draft EIR, Metro held two informational workshops – one virtual, and one in-person – to “inform the public of the key analyses and conclusions of the [Draft EIR],” within 10 calendar days of the release of the Draft EIR. (Pub. Res. Code § 21168.6.9(e)(1)(C)(ii)(3).)

The Draft EIR was released on October 17, 2022. The first informational workshop was a virtual informational workshop held on Saturday, October 22, 2022, from 10 am – 12 pm, via Zoom webinar. The second informational workshop was an in-person informational meeting held on Tuesday, October 25, 2022, from 5 pm – 7 pm at Los Angeles Union Station’s Ticket Concourse. Both informational workshops were, therefore, held “within 10 calendar days after the release of the Draft EIR,” satisfying and exceeding the requirement of SB 44.

SB 44 requires that the informational workshop “inform the public of the key analyses and conclusions of [the Draft EIR].” (Pub. Res. Code § 21168.6.9(e)(1)(C)(ii)(3).)

The format of the virtual informational workshop was a presentation of the proposed Project, including the Draft EIR’s key analyses and conclusions, followed by a question and answer session during which attendees could ask questions using the Zoom Q&A feature. Interpretation in Spanish, Mandarin, and Cantonese was provided in separate channels and slides were made available to attendees in English, Spanish, Chinese (Simplified) and Chinese (Traditional) on the lead agency’s website. Written interpretation of questions typed into Zoom’s chat and Q&A features was also available for any questions received in Chinese (Simplified), Chinese (Traditional), and Spanish. Closed-captioning was also provided for accessibility pursuant to the requirements of the Americans with Disabilities Act (ADA). The virtual informational workshop was staffed by Metro, the Draft EIR preparer’s staff, subject matter experts, and the proposed Project team, who answered attendee questions on the Draft EIR key analyses and conclusions.

The format of the in-person informational workshop was an open house, consistent with Metro’s standard practice, during which attendees could be informed of the proposed Project’s key analyses and conclusions and could learn how to comment on the Draft EIR. Spanish, Mandarin, and Cantonese Interpreters were provided to assist attendees in need of interpretation. Printed materials providing additional information about the Draft EIR’s key analyses and conclusions were provided in English, Spanish, Chinese (Simplified) and Chinese (Traditional). Twelve stations with large, printed boards providing additional information about the subject matter of each station, were set up throughout the Los Angeles Union Station Ticket Concourse, with ten stations focused on specific subject matter areas of the Draft EIR and their key analyses and conclusions, one station dedicated to information on aerial rapid transit technology, and one station with a video presentation of the proposed Project. Attendees could walk around to each station and ask questions to subject-matter experts about the proposed Project. Each station also included printed materials, including the presentation of the Draft EIR’s key analyses and conclusions from the virtual informational workshop, that attendees could review and/or take with them. A hard copy of the Draft EIR was also available at the Summary of Impacts station for attendees to review during the informational workshop. The meeting was staffed by Metro and Draft EIR preparer staff,

subject matter experts, and the proposed Project team, who answered questions from attendees on the Draft EIR key analyses and conclusions.

Metro Held Four Public Hearings – SB 44 Requires Only One

While SB 44 only requires one public hearing to be held within 10 calendar days before the close of the public comment period, Metro held four public hearings to receive testimony on the Draft EIR. (Pub. Res. Code § 21168.6.9(e)(1)(C)(ii)(4).) Metro held three public hearings during the Draft EIR public review period – two in-person and one virtual, and one virtual public hearing immediately following the close of the public review period. The first two public hearings were held within 10 days of the original close of the public review period, which would have been December 16, 2022. After Metro, on November 15, 2022, extended the public review period an additional 30 days for a 90-day public review period ending on January 17, 2023, a third public hearing was added for January 12, 2023, within 10 calendar days of the new close of the public review period. One public hearing was therefore held “within 10 calendar days before the close of the public review period,” satisfying the requirement of SB 44. In light of the disruptions at the January 12, 2023, public hearing, Metro provided a fourth public hearing by way of a virtual public hearing held on February 8, 2023. Verbal comments made at the virtual February 8, 2023 public hearing were deemed timely submitted for the purposes of the Draft EIR public review period.

The first public hearing was an in-person public hearing held on December 10, 2022, from 10:00 am to 12:00 pm, at Los Angeles Union Station’s Ticket Concourse. The second public hearing was a virtual public hearing held on December 13, 2022, from 5:00 pm to 7:00 pm, via Zoom webinar. The third public hearing was an in-person public hearing held on January 12, 2023, from 5:00 pm to 7:00 pm, at Cathedral High School’s Gymnasium, and within 10 calendar days before the close of the public comment period on January 17, 2023. Because there were disruptions at the January 12, 2023, in-person public hearing, Metro held a fourth public hearing after the close of the public review period on February 8, 2023 via Zoom webinar to provide an additional opportunity for attendees to provide verbal testimony. The fourth public hearing was a virtual public hearing held on February 8, 2023, from 5:00 pm to 8:00 pm, via Zoom webinar.

SB 44 requires that the lead agency hold the “public hearing to receive testimony on the draft environmental impact report.” (Pub. Res. Code § 21168.6.9(e)(1)(C)(ii)(4).) Each of the four public hearings provided an opportunity for Metro to receive testimony on the Draft EIR in compliance with SB 44. While not required by SB 44 for the public hearings, project materials and information were also made available at the public hearings, as it was at the informational workshops, in order to inform the public of the key analyses and conclusions of the Draft EIR.

The format of the two in-person public hearings was a public comment opportunity where Metro received verbal and written testimony on the Draft EIR from attendees, as well as an open house, consistent with Metro’s standard practice, during which attendees could be informed of the proposed Project’s key analyses and conclusions. Spanish, Mandarin, and Cantonese Interpreters were provided to assist attendees in need of interpretation, and printed materials providing additional information about the Draft EIR’s key analyses and conclusions were provided in English, Spanish, Chinese (Simplified) and Chinese (Traditional). During the January 12, 2023, in-person public hearing, interpretation was also provided in Taishanese, in addition to Spanish, Mandarin, and Cantonese. Twelve stations with large,

printed boards providing additional information about the subject matter of each station, were set up throughout the venue, with ten stations focused on specific subject matter areas of the Draft EIR and their key analyses and conclusions, one station dedicated to information on aerial rapid transit technology, and one station with a video presentation of the proposed Project. Attendees could walk around to each station and ask questions to subject-matter experts about the proposed Project. Each station also included printed materials, including the presentation of the Draft EIR's key analyses and conclusions from the virtual public hearing, that attendees could review and/or take with them. A hard copy of the Draft EIR was also available at the Summary of Impacts station for attendees to review during the public hearing. In addition to the open house, Metro received testimony on the Draft EIR, in writing on forms provided by Metro, or verbally to the two court reporters who were set up at a "comment station." Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). The public hearings were staffed by Metro and Draft EIR preparer staff, subject matter experts, and the proposed Project team, who answered questions from attendees on the Draft EIR key analyses and conclusions.

The format of the first virtual public hearing held on December 13, 2022, was a presentation of the proposed Project, including the Draft EIR's key analyses and conclusions, followed by a public comment session where Metro received verbal testimony on the Draft EIR from attendees, which was recorded and subsequently transcribed by a court reporter.⁶ Interpretation in Spanish, Mandarin, and Cantonese was provided in separate channels and slides were made available to attendees in English, Spanish, Chinese (Simplified) and Chinese (Traditional) on the lead agency's website. Verbal testimony made in Spanish, Cantonese, or Mandarin was translated to English, and court reporters subsequently recorded the English translation. Closed-captioning was also provided for ADA accessibility. The meeting was staffed by Metro and Draft EIR preparer staff, who gave the presentation and moderated the public comment session.

The format of the second virtual public hearing held on February 8, 2023, as a continuation of the January 12, 2023, public hearing to allow an additional opportunity for attendees to provide verbal testimony due to disruptions at the January 12, 2023, public hearing, was a public comment session where Metro received verbal testimony on the Draft EIR from attendees, which was recorded and subsequently transcribed by a court reporter. Verbal testimony made in Spanish, Cantonese, Mandarin, and Taishanese, was translated to English, and court reporters subsequently recorded the English translation. Closed-captioning was also provided for ADA accessibility. The meeting was staffed by Metro and Draft EIR preparer staff, who moderated the public comment session.

⁶ Transcripts of the public comments during the virtual public hearings are included in Appendix B, Public Hearing Transcripts, of the Final EIR.

TOPICAL RESPONSE B**Ridership Model; Queuing at Stations and Pre-game and Post-game Transportation**

Comments on the Draft EIR raise issues related to the passenger arrival and queuing at the proposed Project's Alameda Station and Chinatown/State Park Station during the pre-Dodger game/event at Dodger Stadium and passenger departure and queuing during post-Dodger game/event at the Dodger Stadium Station. Comments also raise issues related to the proposed Project's coordination with planned improvements at Los Angeles Union Station ("LAUS"), including the planned LAUS Forecourt.

As described in Section 3.17, Transportation, of the Draft EIR, for purposes of the Draft EIR, the transportation analysis included the analyses required by Appendix G of the CEQA Guidelines and the City of Los Angeles Transportation Assessment Guidelines (TAG). Pedestrian queues are not required to be analyzed under CEQA or the TAG. As such, this topical response is provided only for informational purposes. While not required for transportation, as discussed in Section 3.13, Noise, of the Draft EIR, estimates of passengers at stations were used for data input to evaluate operational noise.

Ridership Model

Given the uniqueness of a gondola as a mode of transportation, a model specifically tailored to games and events at Dodger Stadium was developed to estimate ridership of the proposed Project, and the results of this model were used to project ridership and associated potential operational effects including queuing. As detailed in Ridership Model Development, included in Appendix N, Transportation Appendices, of the Draft EIR, the model is based on the statistical relationship between cost and travel time, using data from a variety of sources including mode choice surveys for Angelenos traveling to sporting events in Downtown Los Angeles, travel time and cost to Dodger Stadium and LAUS for driving and transit, parking costs, value of time, mode of access intercept surveys of Dodger Stadium Express riders, and many other data. Many of the underlying factors that would influence pre-game/event and post-game/event travel conditions and ridership are built into the ridership model developed for the proposed Project based on extensive data sources and assumptions validated by data. As shown in Table 1 in Ridership Model Development, included in Appendix N, Transportation Appendices, of the Draft EIR, these data sources include zip codes of residence from Dodgers 2019 ticket sales, GIS ESRI's "Routable Network" to calculate travel times by car between zip codes and Dodger Stadium and between zip codes and LAUS, Metro and Metrolink timetables for travel times by transit, values of time extrapolated from U.S. DOT data, driving costs per mile estimated using vehicle miles per gallon data from the California Air Resources Board, actual parking costs for both Dodger Stadium and transit stations, and actual transit fares from Metro and Metrolink. The ridership model was calibrated by comparing the ridership estimated by the model for existing conditions to actual Dodger Stadium Express ridership counts and was then used to forecast future ridership.

As detailed on page 3.17-40 in Section 3.17, Transportation, of the Draft EIR, the ridership model estimated that 6,000 attendees would ride the proposed Project in 2026 per game/event and 10,000 attendees would ride the proposed Project in 2042 per game/event, reaching the estimated capacity of the system.

As noted on page 3.17-40 of the Draft EIR, for both pre-game/event and post-game/event, it was estimated that approximately 85 percent of the riders would board/deboard the proposed Project at the Alameda Station and 15 percent would board/deboard at the Chinatown/State Park Station based on Dodger ticket sales data by zip code and proximity of zip codes to the Metro L Line (Gold).

Pre-game Transportation

Queue Formation and Management

Ridership Projection

As stated above, there would be an estimated 6,000 pre-game/event riders for the proposed Project in 2026 and 10,000 pre-game/event riders in 2042. Given the assumption that 85 percent of riders would board at Alameda Station, there would be 5,100 riders in 2026 and 8,500 riders in 2042 at the Alameda Station. The remaining 900 riders in 2026 and 1,500 riders in 2042 would board at Chinatown/State Park Station.

Alameda Station

As discussed in Section 2.0, Project Description, of the Draft EIR, the Alameda Station would be located on Alameda Street adjacent to the planned LAUS Forecourt and Placita de Dolores at El Pueblo. There would be two access locations for the Alameda Station – the planned LAUS Forecourt to the east of Alameda Street and the proposed new pedestrian plaza at El Pueblo north of Placita de Dolores to the west of Alameda Street. It was assumed that approximately 70 percent of passengers would arrive from the planned LAUS Forecourt, due to its connection to the regional transit system at LAUS, and the remaining 30 percent of passengers would arrive from the proposed new pedestrian plaza at El Pueblo. Vertical circulation elements (i.e., elevators, escalators, stairs) for pedestrian access, which would also serve as queuing areas at the station, would be introduced at-grade from the planned LAUS Forecourt and the new pedestrian plaza at El Pueblo.

The queues would be managed by efficient vertical circulation and by staff at the station. For the vertical circulation, there would be three escalators connecting the ground floor to the boarding platform from the planned LAUS Forecourt, and of those three, two would serve the peak direction (up in the pre-game/event period and down in the post-game/event period). From the new pedestrian plaza at El Pueblo, one escalator would operate in each direction. In addition, stairs and elevators would be available on both sides of the station. The station's boarding platform would have a queueing capacity of 300 passengers. The management of queues by staff could also be enhanced when needed, at busy times and to address specific circumstances if needs arise, such as directing passengers into specific locations for queuing.

Due to the nature of queue formation, the pre-game/event passenger queues at the Alameda Station in 2026 are estimated to be largely contained on the platform and only minimally extend out into the planned LAUS Forecourt. Queueing is not expected to occur into the new pedestrian plaza at El Pueblo since the majority of riders are expected to board from the planned LAUS Forecourt.

More active queue management would become more frequently needed at the Alameda Station as ridership increases toward the 2042 ridership projection of 10,000 riders. As indicated on page 3.13-52,

in Section 3.13, Noise, of the Draft EIR, the maximum queue on a Dodger Game Day scenario in 2042 was estimated to be 603 people at the Alameda Station. Of these 603 people, approximately 300 would be inside Alameda Station on the boarding platform, and the remaining 303 people would be queueing outside of the Station, within the planned LAUS Forecourt. Unlike existing bus and rail transit service with headways between six minutes or much longer (e.g., over an hour in some cases), the queue line for the proposed Project would constantly be moving due to the 23 second headways of the proposed Project. Based on the maximum queue length of 603 people and an hourly departure rate of 5,000 people per hour, a person at the end of the line would wait for an estimated maximum of seven minutes, before boarding the gondola cabin. Others would wait shorter durations.

The Draft EIR concluded that the Dodger Stadium Express's (DSE) slower travel time to/from Dodger Stadium as compared to the proposed Project and the additional transfer time for riders to walk between Union Station and the maintenance facility would render the proposed Project substantially more competitive with driving time than the current DSE (see Draft EIR, pp. 4-63, 4-71). After a game, travel times on the DSE from Dodger Stadium to LAUS ranged from approximately 18 minutes to 49 minutes, compared with the estimated seven-minute travel time on the proposed Project. With the substantial travel time savings of the proposed Project compared with the Dodger Stadium Express, the wait time and travel time combined represent an improved condition for those choosing to use the proposed Project compared with existing conditions.

In addition, timed tickets would be employed to manage the arrival of passengers on expected large turnout days. On large turnout days, game or event attendees planning on riding the proposed Project would be required to reserve a ticket for a specific time slot in advance. This would spread out the passenger arrivals and assist with queue management. Timed tickets are regularly employed at locations such as museums, particularly on busy days like weekends and holidays, to manage crowds and queuing.

Chinatown/State Park Station

As discussed in Section 2.0, Project Description, of the Draft EIR, the Chinatown/State Park Station would be located adjacent to Spring Street in the southernmost portion of the Los Angeles State Historic Park. As discussed above, approximately 15 percent of proposed Project riders to Dodger Stadium (900 passengers in 2026 and 1,500 passengers in 2042) are expected to board the system before a game or event at the Stadium at the Chinatown/State Park Station.

Access to the Chinatown/State Park Station boarding platform would be from the mezzanine level via elevators and stairs. Comprised of three levels, elevators and stairs from the ground level would lead up to a mezzanine level, and ramps for the queuing area would lead up to a boarding platform. The mezzanine level would allow for internal circulation within the station and would also provide additional queueing space within the station.

Given that the boarding demand would be less than at the Alameda Station (15 percent of total ridership at the Chinatown/State Park Station versus 85 percent at the Alameda Station) and the larger queueing capacity at the Chinatown/State Park Station due to the ability to accommodate a mezzanine level in the

station's design,⁷ the queue is expected to be fully accommodated within the Chinatown/State Park Station and is not anticipated to extend outside of the station.

In addition to serving Dodger games and events at Dodger Stadium, the proposed Project would also serve events at the Los Angeles State Historic Park. As described on page 3.17-26, in Section 3.17, Transportation, in the Draft EIR, the analysis assumed a 10 percent capture rate for rides between LAUS and the Los Angeles State Historic Park for an average sized event (ranging from craft fairs drawing 6,000 to 8,000 people per event to evening concerts drawing 12,000 to 20,000 people per event, averaging 11,200 people per event), meaning that 10 percent of the attendees would ride the proposed Project. Queues for events at the Los Angeles State Historic Park would also be accommodated within the Chinatown/State Park Station and are not anticipated to extend outside the station since the station will have queuing capacity on both the mezzanine and boarding levels. In addition, riders seeking to utilize transit from the Chinatown/State Park Station to LAUS also have the choice of using the Metro L Line (Gold) Station, which will benefit from the proposed Project's proposed pedestrian access enhancements, which could include pedestrian improvements between Metro's L Line (Gold) Station and Chinatown/State Park Station consistent with the Connect US Action Plan, which proposes hardscape and landscape improvements, shade structures, and potential seating.

Post-game Transportation

Queue Formation and Management

As discussed in Section 2.0, Project Description, of the Draft EIR, the Dodger Stadium Station would be located in the southeast portion of the Dodger Stadium property near the Downtown Gate. The boarding platform and the passenger queueing area would be at-grade.

Certain Draft EIR comments suggest that post-game/event ridership on the proposed Project would be less than pre-game ridership due to factors such as the relatively longer queues to board compared to pre-game/event, and the more limited operation of the regional transit system at LAUS in the post-game period after evening games and events (see response to operation of the regional transit system comment in the Post-Game Transit System section below). The ridership modeling for the proposed Project took this into account and incorporated the expected drop in post-game ridership compared to pre-game that is seen today for the Dodger Stadium Express. As discussed in Section 3.17, Transportation, of the Draft EIR, based on data from the 2019 season, the post-game ridership for Dodger Stadium Express ranged from being similar to pre-game ridership (weekend games), or up to approximately 8 percent less than the pre-game ridership (weekday evening games) due to factors such as attendees arriving to weekday evening games from different work locations but traveling home together.

Based on current behaviors, game attendees gradually start leaving the game around 30 minutes before the end of the game. While most people would leave the stadium at the end of the game, given the crowd in the stadium and the distances from the various seating locations in the stadium, it would naturally take people seated the furthest away from the Dodger Stadium Station more time to walk to the station, much

⁷ A mezzanine level was included in the design of the Chinatown/State Park Station to allow access to both sides of the platform while minimizing the vertical circulation footprint at ground level in the Los Angeles State Historic Park. The Alameda Station does not include a mezzanine because it provides access to both sides of the boarding platform via vertical circulation from the planned LAUS Forecourt on the east and the proposed new pedestrian plaza at El Pueblo on the west.

like how it is currently for passengers riding the Dodger Stadium Express. In addition, gondola passengers who would rather not join the line immediately to board the proposed Project in the post-game period could visit some of the entertainment amenities at the stadium, including at the Centerfield Plaza.

Regarding the queue waiting time, Dodger Stadium Express riders today wait in queues to board the service. As discussed below, the queues to board, loading times, and travel times for the Dodger Stadium Express are significantly longer and more variable as compared to the proposed Project. The post-game/event queue for the proposed Project would be constantly moving as cabins would depart every 23 seconds. This is in contrast to the Dodger Stadium Express, which has much longer gaps in bus departures (from a minimum of 3 minutes to a maximum of 19 minutes spacing between bus departures based on 2023 season observations further described below) leading to static queues that build substantially over time as departure frequency is substantially less frequent than the proposed Project.

In order to quantify the existing service time needed to transport Dodger Stadium Express riders, Fehr & Peers observed four post-game time periods during the 2023 season. These games were selected to reflect the mix of game times, days, and opponents. As noted below, the service time from the first bus departure to the last bus departure was nearly 2 hours, with the last bus departing up to 90 minutes after the end of the game. The amount of time between the end of each game and the departure of the last bus varied, with the June 15th and June 16th games both going into extra innings. Additionally, the June 16 game had a post-game drone show. While the Dodger Stadium Express has the capacity to carry approximately 1/5th of the riders of the proposed Project, its service time needed to load all riders is equivalent to that of the proposed Project in 2042, and longer than the needed service time for the proposed Project's 2026 opening year ridership estimate.

- Sunday, June 4, 2023 (Yankees) — 1 hour 50 minute service time; 1 hour 30 minutes post-game
- Thursday June 15, 2023 (White Sox) — 1 hour 54 minute service time; 49 minutes post game (game ended in 11th inning)
- Friday, June 16, 2023 (Giants) — 2 hour 27 minute service time; 52 minutes post game (game ended in 11th inning)
- Saturday, June 24, 2023 (Astros) — 1 hour 15 minutes service time; 1 hour 15 minutes post-game

As noted above, the minimum observed time for a bus to load and depart was approximately 3 minutes, using both the rear and front door. This performance was achieved when the waiting passenger queue exceeded the capacity of buses, and therefore passengers were immediately ready to board. Observed maximum passenger loads for buses under these loading conditions was approximately 65-75 passengers.

As detailed in Topical Response J, Gondola Design and Operations, the proposed Project's 3S cabins typically carry between 30 to 40 passengers each, depending on the exact configuration of seating and cabin amenities selected. Assuming a capacity of 35 passengers per cabin, the proposed Project would carry up to approximately 5,000 pphpd. Therefore, the proposed Project can load an equivalent number of passengers in 2-3 cabins as one Dodger Stadium Express bus. However, as detailed in Topical Response J, multiple cabins would load simultaneously at slower speeds, but would be spaced every 23 seconds, therefore serving the same passenger demand as a Dodger Stadium Express bus in 46-69 seconds (2-3 cabins x 23 second headways) compared with at best 3 minutes for Dodger Stadium Express.

Once all Dodger Stadium Express buses in operation depart for LAUS, headways spaced out due to traffic congestion and overall run time between Dodger Stadium and LAUS. The longest time between bus departures was observed to be 19 minutes. During this 19 minute time period, the passenger queue either remained static, or grew as additional riders entered the queue following their exit from Dodger Stadium.

In contrast, within the same approximately 1/3 of an hour between Dodger Stadium Express departures at its longest headway, the proposed Project could serve approximately 1,667 passengers on average ($5,000/3=1,667$), which is approximately 90 percent ($1,667/1,840$) of the average 2019 season one-way passenger load of 1,840 carried by the Union Station Dodger Stadium Express in total for an entire game.

The observed length of the Dodger Stadium Express post-game passenger queues was substantial. For example, the longest queues observed at the Yankees game on June 4 and the Astros game on June 24 ranged from 400 to 775 feet (the lines for the two extra-inning games were not as long since the extra innings stretched out the departures), with passengers typically standing two to four persons abreast.

These observations indicate that riders are willing to wait for substantial periods of time after a game to board the Dodger Stadium Express, despite its slower travel time and long waits between buses, supporting the concept that riders would also be willing to wait after a game to board the proposed Project with its improved level of service. An additional indicator that Dodger fans have a willingness to wait for transit following a game is that fact that the Golden State Gate C cleared before the last Dodger Stadium Express bus departed at each of the games observed.

While the proposed Project would substantially improve the service level and reduce passenger queueing compared with the Dodger Stadium Express, queueing to ride post-event transit systems is a common phenomenon at athletic events, concerts, and other events and most large stadia and arenas. As noted above, attendants would be available to assist with management of queueing as needed.

Proposed Project Versus Other Modes

Certain Draft EIR comments suggest that passengers of the proposed Project may prefer to leave Dodger Stadium in other modes, such as the Dodger Stadium Express, rideshare, or even walking, due to the queues to board the proposed Project.

Dodger Stadium Express

As detailed on page 4-63, in Section 4.0, Alternatives, of the Draft EIR, the travel times for the Dodger Stadium Express ranged from approximately 18 minutes to 49 minutes post-game (which occurred on opening day), based on data for the 2019 season. Excluding the opening day travel time outlier, the post-game travel ranged from approximately 18 minutes to 24 minutes. These travel times are three to seven times the seven-minute travel time on the proposed Project, plus the longer loading time for the Dodger Stadium Express buses compared to the proposed Project cabins. In addition to the longer travel time, the Dodger Stadium Express travel times are more variable than the fixed seven-minute travel time for the proposed Project. In addition, the travel time for the proposed Project is not affected by factors such as congestion leaving the stadium, the congestion in the streets, and unexpected delays such as collisions and road closures the way that Dodger Stadium Express is today.

More information on the Dodger Stadium Express alternative can be found in the discussion of the Transportation Systems Management Alternative in Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options.

Rideshare/Transportation Network Company

As shown on page 28 of the Ridership Model Development, in Appendix N, Transportation Appendices, of the Draft EIR, data from the 2019 season indicated a Transportation Network Company (TNC) average share of 5 percent of game attendees at Dodger Stadium. This 5 percent share of game attendees on TNCs is included in the 2026 and 2042 forecast of game attendees leaving Dodger Stadium. Based on 2019 season data, TNC vehicle counts are higher for pre-game conditions compared with post-game conditions, likely due to an increase in average vehicle occupancy (AVO) post-game, as some game attendees may arrive separately (e.g., from different places of work), but depart together. This pattern is expected to continue with the proposed Project, since TNC access to the proposed Project is expected to be similar to Dodger Stadium. As described on page 3.17-28 of the Draft EIR, post-game TNC vehicle counts collected at Dodger Stadium are lower than pre-game TNC vehicle counts, indicating that TNCs are fuller post-game than pre-game, potentially because groups whose members travel to the game separately from two different origins may leave the game together, whether in a TNC or a private vehicle. These travel patterns are taken into account in the VMT analysis of the proposed Project.

Walking

While there are some game attendees who currently choose to walk to and from Dodger Stadium, the walk would take approximately five to eight times as long as the ride on proposed Project, and the path would be on a steep downward grade that does not meet Americans with Disabilities Act Accessibility Guidelines, and would be challenging for children, seniors, or people with limited physical mobility. The walk times for an average walker would take approximately 25 minutes from the proposed location of the proposed Dodger Stadium Station to the Metro L Line (Gold) Station and 35 minutes to LAUS, compared to the three-minute ride to the Chinatown/State Park Station (over eight times faster) and the seven-minute ride to the Alameda Station (over five times faster) on the proposed Project. Walking is not expected to substantially increase post-game as a result of the proposed Project. A project alternative, the Pedestrian Enhancement Alternative, with widened and improved sidewalks with enhanced safety features, and an escalator up the hill to Dodger Stadium, was considered but dismissed due to limitations on travel time and grade. More information on this project alternative can be found in discussion of the Pedestrian Enhancement Alternative in Section 5.0, Corrections and Additions, of this Final EIR.

Post-Game Transit System at Los Angeles Union Station

Draft EIR comments acknowledged the reduced operation of the regional transit system at LAUS in the late evening upon arriving to LAUS after riding the proposed Project after a game or event at Dodger Stadium. The limited operation of the regional transit system in the evening is a condition faced by riders of the Dodger Stadium Express today. Based on 2019 season data, there is an approximate 8 percent reduction in post-game riders of the Dodger Stadium Express on weekday evenings compared to pre-game. The proposed Project model assumed this same reduction for the post-game ridership estimates for the proposed Project. To be conservative, the full reduction of post-game ridership is assumed to shift

to TNCs, which are estimated to generate more VMT than private vehicle trips due to the VMT generated by the driver traveling to the pick-up location at Dodger Stadium.

The specific future transit network for buses and service hour and service frequency for buses and trains, cannot be fully known since Metro, Metrolink, and municipal transit operators adjust their bus routes and service hours frequency approximately every six months. Metro’s goal as an agency is to continue to expand and improve the service provided on the regional transit network. As stated on page 3.17-4, in Section 3.17, Transportation, of the Draft EIR, Metro presented the vision to improve transit infrastructure and service in the 2020 Long Range Transportation Plan.⁸ There are several planned and funded rail and bus rapid transit projects expected to open between 2023 and 2042, including the Downtown Regional Connector (which opened in June 2023), the Purple Line Extension to West Los Angeles, the West Santa Ana Branch, the completion of the K (Crenshaw) Line, the Gold Line Foothill Extension Phase 2B, and others. In January 2023, Metrolink was awarded nearly \$107 million of state funds to implement improvements to the regional rail system. The NextGen Bus Plan, a major restructuring of bus routes which Metro adopted in 2020, has a goal to “improve and expand midday, evening and weekend service, creating an all-day, 7-day-a-week service.”⁹

The Project Sponsor would coordinate potential improvements to late night service with Metro, Metrolink, and other transit service providers.

Coordination with Metro on the Planned LAUS Forecourt

Comments suggest the potential for the proposed Project and passenger queueing to interfere with other proposed plans for the planned LAUS Forecourt.

As described in Section 2.0, Project Description, of the Draft EIR, Metro’s LAUS Forecourt and Esplanade Improvements Project (“Forecourt and Esplanade Project”) is currently being developed in coordination with the City of Los Angeles, and would include repurposing the existing northwestern parking lot at LAUS into a pedestrian forecourt and gathering space, as well as pedestrian and bicycle enhancements along Alameda Street and Los Angeles Street.

As described on page 5-42 in Section 5.0, Other CEQA Considerations, of the Draft EIR, the West Santa Ana Branch Transit Corridor Project (“WSAB Project”) involves the construction of a new light rail transit line between Downtown Los Angeles and Artesia. On January 27, 2022, the Metro Board selected a Locally Preferred Alternative for the initial opening segment between the proposed Pioneer Station and the A Line Slauson Station. The ultimate terminus would be at Union Station, with two alternatives, either within the planned LAUS Forecourt or behind the Metropolitan Water District building.

As discussed in Section 2.0, Project Description, of the Draft EIR, the Alameda Station location is compatible with Metro’s existing plans at LAUS, including the Forecourt and Esplanade Project.

The Forecourt and Esplanade Project would repurpose the existing northwestern LAUS parking lot into a new civic space with sustainability features. The proposed Project, as well as other projects like the WSAB Project, have proposed plans that could have access within the planned LAUS Forecourt. The current plans

⁸ Los Angeles County Metropolitan Transportation Authority, 2020 Long Range Transportation Plan (2020).

⁹ Los Angeles County Metropolitan Transportation Authority, NexGen Bus Plan (2020).

for WSAB reflect a subterranean station with a portal within the Forecourt, which would have vertical circulation that would meet at the same general proposed location as the vertical circulation for the proposed Project. The Project Sponsor has coordinated with Metro on the design and placement of the proposed Project's Alameda Station and its vertical circulation, and the planned LAUS Forecourt design would reflect the presence of the proposed Project's Alameda Station. Since the planned LAUS Forecourt has not yet been designed or funded, the ultimate design of the Forecourt would take into consideration the other projects such as the proposed Project and the WSAB Project. The proposed Project would not preclude the other planned activities and projects in this area.

TOPICAL RESPONSE C

Project Features

Comments on the Draft EIR requested additional information as to how the proposed Project would take into account the current needs of the surrounding communities, including economic barriers and social challenges with access to transit, and provide an opportunity to local community stakeholders to have a decision-making role in how to showcase the surrounding art and culture, including utilizing local artists. In addition to the potential to alleviate existing congestion and associated air pollution in the Project area, which includes communities disproportionately burdened by multiple sources of air pollution, the proposed Project seeks to provide a number of features to enhance and provide additional benefit to the surrounding community, including but not limited to the following:

- Sustainability features at the stations, towers, and junction and open space enhancements at the Los Angeles State Historic Park
- Community Access Plan to allow local residents and employees of businesses close to the proposed Project to ride the gondola using their Metro fare at no additional cost
- Pedestrian access enhancements along the proposed Project alignment, including landscape and hardscape improvements, shade structures, and potential seating
- Access to the Los Angeles State Historic Park and Elysian Park
- Mobility hubs at Chinatown/State Park Station and Dodger Stadium Station
- Wayfinding signage adjacent to and throughout the proposed Project alignment
- Utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture and history
- Design of the proposed Project components inspired by adjacent neighborhood culture and history
- Interpretation Plan to identify unique ways to use the proposed Project to provide additional interpretation of the adjacent neighborhood culture and history, particularly aimed at a diverse visitor community
- Marketing plans to help promote the adjacent business areas, while honoring the rich history and cultural significance of each area
- Business and Community Support Program during construction
- Partnerships with local businesses and nonprofits along the proposed Project alignment
- Commitment to a goal of utilizing at least 35 percent MBE/WBE/DBE/SBE/DVBE/LGBTQ-owned businesses¹⁰ during the proposed Project's construction phase

The Project Sponsor will convene stakeholder groups to ensure adequate vetting and consensus around community features of the proposed Project.

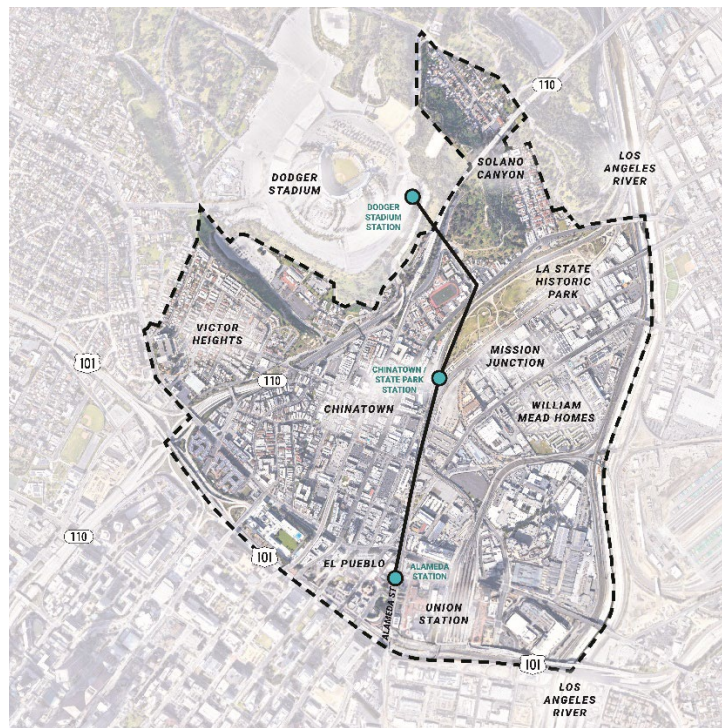
¹⁰ MBE/WBE/DBE/SBE/DVBE/LGBTQ refers to minority business enterprises (MBE), women business enterprises (WBE), disadvantaged business enterprises (DBE), small business enterprise (SBE), disabled veteran business enterprises (DVBE), and LGBTQ-owned businesses.

Sustainability Features and Open Space Enhancements

As discussed in Section 2.7.9, Sustainability Features, of the Draft EIR, the proposed Project would include several sustainability features, including the installation of landscaping at the Alameda Station, Alpine Tower, Chinatown/State Park Station, Stadium Tower and Dodger Stadium Station, which would include drought tolerant landscape features and low water use irrigation strategies. The station, junction, and tower hardscape materials would also be selected to reduce Solar Reflective Index values to minimize the heat island effect. At the Chinatown/State Park Station, shade structures and potential seating would be included. The proposed Project would also provide open space enhancements at the Los Angeles State Historic Park and along the pedestrian pathway connecting Dodger Stadium Station and Dodger Stadium.

Community Access Plan

The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the proposed Community Access Plan. The graphic below demonstrates the geographic area for the Community Access Plan applicability. Moreover, under the Community Access Plan, transfers to and from the Metro regional transit system and the proposed Project would be free. The Community Access Plan would honor Metro's numerous discount fare programs for a variety of needs (i.e., senior fares, student fares, etc.). Residents and employees of businesses located within the communities adjacent to the proposed Project alignment would only pay the rate they pay to ride the Metro system to the proposed Project. The proposed Project would also be free to ride for anyone with a ticket to a Dodger game.



Pedestrian Access Enhancements

As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access

enhancements and first/last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. The overall purpose of the proposed Project is to provide a direct transit connection between LAUS and the Dodger Stadium property via an aerial gondola system and improve connectivity for the surrounding communities by linking to the Los Angeles State Historic Park, Elysian Park, and the neighborhoods along the proposed alignment and the region's rapidly growing regional transit system at LAUS, as well as the businesses at El Pueblo and downtown Chinatown. The proposed Project would also provide new connections to and between currently underserved neighborhoods and uses along the proposed alignment, including El Pueblo, Chinatown, Mission Junction, the Los Angeles State Historic Park, Elysian Park, and Solano Canyon.

To facilitate this transportation connectivity, the proposed Project would include pedestrian access enhancements including pedestrian improvements between Metro's L Line (Gold) Station and Chinatown/State Park Station consistent with the Connect US Action Plan, shade structures, and potential seating, as well as support for the future Los Angeles State Historic Park bike and pedestrian bridge, discussed in greater detail below. The proposed Project would also include pedestrian enhancements and drought tolerant landscaping and open space enhancements, including at the Alameda Triangle, the Los Angeles State Historic Park, and along the pedestrian pathway connecting Dodger Stadium Station and Dodger Stadium, and improved access to Los Angeles State Historic Park and Elysian Park. Implementation of the proposed Project's Alameda Tower would include reuse and integration of the existing pavers located at the Alameda Triangle, and both the Alameda Tower and Alpine Tower will provide additional hardscape and landscape updates around the tower bases.

Access to Parks

The proposed Project would provide daily transit service to visitors of the Los Angeles State Historic Park and Elysian Park. The Los Angeles State Historic Park hosts various events throughout the year including craft markets, concerts, movie nights, and festivals. These events attract visitors from the surrounding local communities and throughout the region who can access the park from the proposed Project. While not proposed as part of the Project, the Draft EIR includes an analysis of the State Park's proposed bike and pedestrian bridge as part of Design and Use Option E. The bridge would provide important connections for students at Cathedral High School, and between the park and the Chinatown, Savoy, and Solano Canyon neighborhoods to support convenient access for the community. The analysis serves to provide environmental clearance for the bike and pedestrian bridge as a benefit to the Los Angeles State Historic Park, as while the bike and pedestrian bridge was mentioned in the Los Angeles State Historic Park General Plan and studied in the State Park's Bridge Feasibility Study, the bike and pedestrian bridge was never environmentally cleared. Access to Elysian Park, the City's second largest park, comprising 575 acres, would be provided through a mobility hub at the Dodger Stadium Station, where passengers would be able to access a suite of first/last mile multi-modal options.

Mobility Hubs

The proposed Project would include mobility hubs at Chinatown/State Park Station and Dodger Stadium Station where passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program.

Wayfinding Signage

The proposed Project would include multilingual signage to support wayfinding for transit passengers, including information about transit connections and other important information to facilitate transit usage, as well as directional and pedestrian signage adjacent to and throughout the proposed Project as necessary to facilitate access and safety, which would be illuminated in conformance with all applicable requirements of the Los Angeles Municipal Code. This wayfinding signage would help to promote connectivity between destinations including El Pueblo, Chinatown, Los Angeles State Historic Park, Elysian Park, and Dodger Stadium.

Utilization of Local Artists to Reflect the Unique Neighborhood Culture and History

As discussed in Section 2.0, Project Description, of the Draft EIR, each station could provide an opportunity for site-specific artwork commissioned from artists from the surrounding community, that is reflective of the unique neighborhood culture. The proposed Project has also committed to one “Art Cabin” that could feature artwork commissioned from local artists. Refer to page 106 of the Lighting Study attached to Appendix C, Visual Impact Assessment, of the Draft EIR, for a conceptual, illustrative rendering of the “Art Cabin.” As discussed in Section 3.01, Aesthetics, of the Draft EIR, Metro’s public art policy mandates that art be displayed throughout Metro’s transportation network in order to activate and enliven public spaces that otherwise serve a functional purpose. While not subject to the requirements of the public art policy, the proposed Project would expand the number of opportunities where local artists can display their work, consistent with the public art policy. As discussed in Topical Response M, Comparable Systems, of the Final EIR, the “Mexicable” system in Mexico City, Mexico, has galvanized the creation of public art, with as many as 52 works of street art and sculptures surrounding the system’s alignment. The Mexicable enabled collaborations with numerous local and international artists to design public art that now line the system’s alignment to be viewed by passengers and local residents. Similar to the Mexicable, the proposed Project could also identify additional sites for commissioned murals or art installations along the proposed Project alignment.

The proposed Project would create numerous opportunities to collaborate with and showcase local artists, including convening stakeholder groups to coordinate on issues including utilization of local artists and identification of sites along the proposed Project alignment to showcase the work of local artists.

The Design of Proposed Project Components Would Be Inspired by Adjacent Neighborhood Culture and History

Each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area, and which would be discussed with identified stakeholder groups. As discussed in Section 2.0, Project Description, and Appendix C, Visual Impact Assessment, of the Draft EIR, the proposed Project would not adhere to a fixed, Procrustean¹¹ design across the entire system, but each individual component would be designed to weave seamlessly into the surrounding urban fabric and the characteristics of the surrounding neighborhoods, and the colors and material finishes of each station and junction would be chosen to be complementary to each of their respective sites. As stated in Section 2.0, Project Description, of the Draft EIR, the proposed architectural design employs a simple barrel vault form,

¹¹ “Procrustean” design refers to design that is designed to produce conformity.

which utilizes a hollow structural steel section structure and metal panel assembly to allow the introduction of custom perforation patterns that take cues from the immediate neighborhood culture, while also providing a visual lightness to the form. Likewise, the neutral light-tone grey of each tower would be intended to conform with the surrounding urban environment and will not provide a highly metallic or mirrored finish to minimize glare. Further, as discussed in Appendix C, Visual Impact Assessment, of the Draft EIR, the proposed Project would be consistent with the goals of the City of Los Angeles' General Plan Framework Element regarding urban form and design and would support the Silver Lake – Echo Park – Elysian Valley Community Plan's aim to "provide color, lighting, and surface texture accents and complementary building materials to building walls and facades, consistent with architectural themes of the neighborhood." Moreover, the proposed Project would support the goals and objectives of the City's General Plan Framework to "improve the quality of the public realm through Project design, which would promote accessibility via improved pedestrian pathways that would be complementary and appropriate to the character of the existing buildings in the surrounding area," and the Central City North Community Plan's objective to "enhance the appearance of commercial districts," by selecting color, lighting, surface texture accents, and building materials to complement the architectural themes of each individual neighborhood.

Interpretation Plan

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

Business and Community Support Program During Construction

During construction of the proposed Project, the Project Sponsor would create a Business and Community Support Program to assist local businesses financially affected by construction activities.

The Business and Community Support Program would provide assistance to local businesses, including advertising support in a local or regional newspaper and on social media, and funding for temporary signage and advertising during construction to help businesses where access has been affected due to construction activity. The Program would also provide notice of the schedule for planned construction activities, lane closure schedules and information, and any required short-term modifications to property access, as well as access plans that ensure that all businesses are provided with adequate access during construction. The proposed Project would also implement its Construction Traffic Management Plan, as discussed in Section 3.17, Transportation, and as shown in Appendix B, Construction Assumptions, of the Draft EIR, that would include detours and ensure that emergency access is maintained throughout all construction activities. Materials shall be provided in English, Spanish, Chinese (Traditional), and Chinese (Simplified). This Program would also provide notice to property owners regarding utility relocations, which as discussed in Section 3.19, Utilities and Service System, of the Draft EIR would be implemented pursuant to the proposed Project's Utility Relocation Plan in coordination with the Los Angeles

Department of Water and Power and with the utility companies to minimize impacts to services during construction. In addition, this Program would provide methods by which residents and business owners can convey their concerns about construction activities and the effectiveness of measures during the construction period so activities can be modified to reduce adverse effects.

Partnerships with Local Businesses

The proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including MBEs, WBEs, DBEs, SBEs, DVBE, and LBGTO-owned businesses. In addition to providing accessible and affordable mobility options for these businesses' employees, the proposed Project would create economic opportunities for potential partnerships with these businesses. As discussed in Appendix A, Scoping Report, of the Draft EIR, the proposed Project's team engaged in extensive outreach to local businesses and institutions to listen to and learn from the local community in order to pursue equitable outcomes.

As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses within the impacted communities of El Pueblo, Chinatown, Solano Canyon, Victor Heights, and Mission Junction, while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors, and represents an opportunity to increase pedestrian traffic along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to El Pueblo, Chinatown and other areas along the proposed Project alignment, which, consequently, adds revenues to these businesses in the communities the proposed Project hopes to serve. For example, as discussed in the Parking Study, the proposed Project could implement business to business partnerships with local businesses to pre-sell bundled packages that include patronage at the local business, as well as off-street parking, and a ticket to ride the proposed Project.

As discussed in Section 5.0, Other CEQA Considerations, of the Draft EIR, the locations of the proposed Project's Alameda Station and Chinatown/State Park Station optimize pedestrian access, driving customers to local businesses. The proposed Alameda Station would provide pedestrian access to the planned LAUS Forecourt and El Pueblo, enhancing access to El Pueblo and promoting and further attracting visitors to Olvera Street. The proposed Project, in addition to helping to promote and provide added connectivity to the Chinatown area, also would locate its Chinatown/State Park Station within a 3-minute walk to/from Metro's L Line (Gold) Chinatown Station as a way to drive additional foot traffic to Chinatown and provide direct access to the Los Angeles State Historic Park. The proposed Project would provide area residents and businesses with transit access to local businesses and institutions. The proposed Project could partner, for example, with the Chinese American Museum, the Italian American Museum, Chinatown businesses, and Olvera Street Merchants to help in addressing visitor, educational, and customer access to these businesses and institutions.

Partnerships with local businesses and nonprofits could also include an overall marketing plan on how best to market the 'gondola' to the benefit of the region; this may include additional monies for specific marketing of identified areas along the proposed Project alignment, in addition to grant-based assistance for anti-displacement strategies.

The Project Sponsor is in the process of and will continue convening stakeholder groups to coordinate on partnerships with local businesses.

The Project Sponsor's Commitment to Utilizing MBE/WBE/DBE/SBE/DVBE/LGBTQ-owned Businesses During Construction

The Project Sponsor has committed to a goal of 35 percent utilization of MBEs, WBEs, DBEs, SBEs, DVBEs, and LGBTQ-owned businesses during the proposed Project's construction phase.

TOPICAL RESPONSE D**Metro Is The Proper Lead Agency For The Proposed Project As The Region's Transportation Authority; Metro Named And Consulted With The Applicable Responsible Agencies**

Comments on the Draft EIR address the role of Metro as CEQA lead agency for the proposed Project. Comments suggest that the City of Los Angeles ("City") should serve as the lead agency due to the discretionary approvals required for the proposed Project from the City and other factors. Under CEQA and as the region's transportation authority, Metro is properly designated as lead agency for the proposed Project. Metro owns Los Angeles Union Station ("LAUS"), Southern California's primary transportation hub, which provides local and regional access via multiple modes of transport and service providers including Metro, Metrolink, Amtrak, and municipal and private bus operators. The proposed Project would commence adjacent to LAUS and would operate daily, providing a high-capacity aerial rapid transit connection between the regional transit system accessible at LAUS and the Dodger Stadium property and the surrounding communities, including Chinatown, Mission Junction, the Los Angeles State Historic Park, and Elysian Park.

Comments on the Draft EIR also suggest that Metro did not properly name responsible agencies, and failed to properly consult with all such agencies. However, Metro identified, provided notice, and consulted with responsible agencies in full compliance with CEQA. Responsible agencies for the proposed Project were identified as the California Department of Transportation ("Caltrans"), the California Department of Parks and Recreation ("State Parks"), the California Division of Occupational Safety and Health ("Cal/OSHA"), and the City.

Metro Is the Appropriate Lead Agency as the Region's Transportation Authority and the Agency With Primary Responsibility for Supervising, Carrying Out, or Approving the Proposed Project

Metro is appropriately designated as lead agency under CEQA for the proposed Project's environmental review because Metro has "the greatest responsibility for supervising or approving the project as a whole."¹²

Under CEQA, lead agency "means the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment" and in ensuring overall compliance with CEQA.¹³ In the case of a project to be carried out by a nongovernmental person or entity, as is the case for the proposed Project, the lead agency "shall be the public agency with the greatest responsibility for supervising or approving the project as a whole."¹⁴

As the agency tasked with planning, operating, and coordinating funding for the Los Angeles Region's transportation system, Metro is the appropriate lead agency for the proposed Project. Under the County Transportation Commissions Act, the State Legislature provided Metro with broad authority over public

¹² CEQA Guidelines Section 15051(b).

¹³ California Public Resources Code Section 21067; CEQA Guidelines Section 15367.

¹⁴ CEQA Guidelines Section 15051(b) [emphasis added].

transportation planning and coordination for the Los Angeles region.¹⁵ This Act declares that Metro shall aim to “achieve the operation of a coordinated and integrated transportation system which will reduce automobile usage and dependency, reduce the consumption of scarce and expensive energy fuels, and reduce the levels of automobile-related air pollution.”¹⁶ Metro is authorized to “[d]o **any and all things** necessary to carry out” these purposes.¹⁷ As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide an aerial rapid transit option for visitors to Dodger Stadium, while also providing access between the Dodger Stadium property, the surrounding communities, including Chinatown, Mission Junction, Elysian Park, and Solano Canyon, and the Los Angeles State Historic Park, to the regional transit system accessible at LAUS. Accordingly, the proposed Project is consistent with Metro’s statutory purpose.

Consistent with Metro’s statutory purpose to operate an integrated transportation system that reduces automobile usage, and as discussed in Section 2.10, Required Permits and Approvals, in Section 2.0, Project Description, of the Draft EIR, Metro is tasked with considering approval of the proposed Project’s plans for design, construction, and implementation under Public Utilities Code section 130252,¹⁸ as well as with consideration of the written approvals to operate the proposed Project, including an easement or other agreement or approval to authorize construction and operation of the project within a portion of LAUS pursuant to Public Utilities Code section 130521 and Civil Code section 801, and an encroachment permit. These potential approvals are consistent with the State Legislature’s grant of authority to issue approvals for transportation projects to Metro. Metro’s approvals are necessary for the proposed Project to operate.

The proposed Project would become a part of the regional transportation system that state law tasks Metro with overseeing. If the proposed Project is approved, Metro would have the primary responsibility for implementing the proposed Project as part of this regional transportation system, consistent with Metro’s statutory purpose. Therefore, Metro is the appropriate lead agency for the proposed Project. However, some commenters claim that because the City has approval authority over more discretionary approvals than Metro, the City is the appropriate lead agency.

Under CEQA, where two or more public agencies meet the criteria for acting as lead agency under CEQA Guidelines section 15051(b), the agency that acts first will normally serve as lead agency.¹⁹ Here, consistent with Metro’s statutory purpose and responsibility for implementing the proposed Project, Metro will act first to review and consider certification of the proposed Project’s Final EIR, as well as to consider the approval of the proposed Project’s plans for design, construction, and implementation. Metro elected to serve as lead agency, and the City has not disputed this designation and has cooperated as a responsible agency. CEQA provides for the state to settle lead agency disputes under CEQA Guidelines section 15053. The state shall designate a lead agency based on the criteria in CEQA Guidelines section 15051, as well as the capacity of the agency to adequately fulfill the requirements of CEQA. CEQA Guidelines section 15051 also notes that where two or more public agencies have a “substantial claim” to

¹⁵ Public Utilities Code, 1976, Section 130000, et seq.

¹⁶ Id., § 130001(b).

¹⁷ Id., § 130105(f) [emphasis added]; see also id., at §§ 130050, 130050.2, 130051.13, 130051.14, 30001(a).

¹⁸ Public Utilities Code section 130252 provides that “All plans proposed for the design, construction, and implementation of public mass transit systems or projects” are to be submitted for Metro for potential approval.

¹⁹ CEQA Guidelines Section 15051(c).

serve as lead agency, the agencies may designate one agency as lead agency by agreement.²⁰ Neither the state designation or agency agreement designation process was invoked because the agencies involved in the proposed Project agreed that Metro was the appropriate lead agency.

Responsible Agencies

Under CEQA, a responsible agency is “a public agency, other than the lead agency, which has responsibility for carrying out or approving a project.”²¹ In other words, responsible agencies are agencies, other than the lead agency, that have some discretionary authority for carrying out or approving a project.²² While the lead agency is responsible for considering all environmental impacts of the project before approving it, a responsible agency has a more specific charge: to consider only those aspects of a project that are within an area of expertise of the agency or that are required to be carried out or approved by the agency.²³ The responsible agency has authority to mitigate or avoid the environmental effects of only those parts of the project which the responsible agency is called upon to carry out or approve.²⁴ Similarly, a responsible agency may disapprove a project in order to avoid only those environmental effects of the part of the project that the responsible agency would carry out or approve.²⁵

Responsible Agencies Were Properly Identified and Properly Notified of the Preparation and Completion of the Draft EIR

The responsible agencies for the proposed Project are identified in Section 2.10, Required Permits and Approvals, in Section 2.0, Project Description, of the Draft EIR, and were identified as Caltrans, State Parks, Cal/OSHA, and the City. Contrary to a commenter’s claim, the California Public Utilities Commission (“CPUC”) has no discretionary approval authority related to the proposed Project. As discussed above, pursuant to the County Transportation Commissions Act, the State Legislature granted Metro the authority to approve and consider transit projects within Los Angeles County.

As reflected in Appendix A, Scoping Report, of the Draft EIR, and Appendix A, Public Outreach Report, of this Final EIR, the four responsible agencies were given proper notice of preparation of the Draft EIR and notice of completion of the Draft EIR, including being provided with copies of the Draft EIR and an opportunity to comment, as CEQA requires.²⁶

Metro Engaged in Consultation with Responsible Agencies Early in the CEQA Process and Continues Such Consultation

Under CEQA, responsible agencies are encouraged to consult with the lead agency.

As discussed in Section 8.0, List of Preparers, of the Draft EIR, Metro engaged in required consultation with all responsible agencies during the process of preparing the Draft EIR for the proposed Project, in compliance with CEQA. This consultation process included meetings with Metro and the responsible agencies to discuss the scope and content of the environmental information that Metro would include in

²⁰ CEQA Guidelines Section 15051(d).

²¹ California Public Resources Code Section 21069.

²² CEQA Guidelines Section 15381.

²³ See California Public Resources Code Sections 21104, 21153(c), 21069.

²⁴ CEQA Guidelines Sections 15041, 15096(g)(1).

²⁵ CEQA Guidelines Section 15042.

²⁶ California Public Resources Code Section 21080.4(a); CEQA Guidelines Section 15096(b)(2).

the Draft EIR,²⁷ additional consultation with the City and State Parks as Draft EIR preparers, and receiving comments from these responsible agencies on the Draft EIR.²⁸ This consultation process will continue throughout the course of the environmental review process. Consultation helps ensure that the EIR includes the necessary analysis regarding environmental effects within a responsible agency's jurisdiction to allow that agency to rely on the EIR, if ultimately certified, when considering the necessary approvals for the project that fall under its regulatory authority. If Metro certifies the Final EIR, each responsible agency will then conduct its own discretionary review process for the Project approvals for which it is responsible.²⁹

²⁷ California Public Resources Code Section 21080.4(b); CEQA Guidelines Section 15104.

²⁸ California Public Resources Code Section 21153(c); CEQA Guidelines Section 15086(c).

²⁹ See Draft EIR, Section 2.0, Project Description, pp. 2-57-2-62.

TOPICAL RESPONSE E**The Proposed Project Will Not Displace Housing or Prevent Planned Housing**

Comments on the Draft EIR address the proposed Project's location near existing and planned housing.³⁰ This topical response provides an overview of the proposed Project's consistency with existing and planned and proposed housing in the vicinity of the proposed Project.

The Proposed Project Will Not Displace Any Housing

As discussed in Section 3.14, Population and Housing, of the Draft EIR, no displacement of existing residences or housing would occur in connection with construction or operation of the proposed Project, which would operate primarily over the public ROW and publicly owned property. The proposed Project is intended to accommodate existing and future transportation needs of the area's population. As discussed on page 3.14-14, in Section 3.14, Population and Housing, of the Draft EIR, "the proposed Project area is being developed with various mixed-use developments," including various "planned or recently constructed high-density developments." The proposed Project would support the City's goals of providing transit near residential development. Further, as discussed in Section 2.0, Project Description, of the Draft EIR, one of the proposed Project's objectives is to "maximize the use of ROW, and publicly owned property and minimize aerial rights requirements over private properties, taking into account existing and future adjacent land uses." The proposed Project was designed in accordance with this objective. As discussed in Section 2.5.1, Proposed Project Alignment, of the Draft EIR, the "proposed Project alignment was chosen as it maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties, taking into account existing and future adjacent land uses."

Section 2.0, Project Description, and Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR provide an overview of the proposed Project alignment, showing the portions of the proposed alignment over public ROW and publicly owned property and the portions over private property. As shown in Section 2.0 and Appendix Q, the proposed Project alignment maximizes the use of the public ROW and publicly owned property, minimizing aerial rights required over private properties (including both existing and future adjacent land uses). Figure 2-8: Proposed Alignment Over Public ROW/Publicly-Owned Property and Private Property, in Section 2.0, Project Description, of the Draft EIR, shows the minimal amount of private property where aerial rights may be required for the proposed Project.

As discussed in Section 2.0, Project Description, and Section 3.14, Population and Housing, of the Draft EIR, the proposed Project would increase connectivity in downtown Los Angeles by providing direct linkages to major residential, employment, recreational, and tourist destinations, such as Los Angeles Union Station (LAUS), El Pueblo/Olvera Street, Chinatown, Los Angeles State Historic Park, Dodger Stadium, and Elysian Park. Residents in existing and planned housing in the Project area would be connected to parks and recreational opportunities, including the Los Angeles State Historic Park and Elysian Park, the City's second-largest park. In addition, as discussed in Section 3.14, Population and Housing, of the Draft EIR,

³⁰ To the extent comments concern impacts to existing housing, the Draft EIR fully analyzed and considered the proposed Project's potential impacts to existing housing projects as part of the baseline physical conditions by which a lead agency determines whether an impact is significant, i.e., the environmental setting. (CEQA Guidelines § 15125; see also Draft EIR Sections 2.0, 3.01, 3.02, 3.03, 3.04, 3.05, 3.06, 3.07, 3.08, 3.09, 3.10, 3.12, 3.13, 3.14, 3.15, 3.16, 3.17, 3.18, 3.19, 3.20.)

approximately 25 percent of the residents in the Project Study Area utilize either public transportation or walking for commuting to work. Implementation of the proposed Project would provide additional access and mobility by providing a transit option to/from LAUS and Chinatown and other employment areas in downtown Los Angeles that would avoid congested local roadways and provide a transit option to Dodger Stadium on game days and for special events that would bypass typical vehicle traffic. As discussed in Section 5.0, Other CEQA Considerations, of the Draft EIR, given that the area in the City where the proposed Project alignment is located is densely urbanized and there are existing planned developments for the area, the proposed Project would be a benefit for existing and planned uses in the area as an additional transit option. Therefore, the proposed Project would not displace housing, but would provide a benefit to existing residents in the area.

Consistent with the Project Objectives, the Proposed Project Was Designed In Consideration of Planned or Anticipated Housing Projects, Including the Restorative Justice Master Plan and Hope Village Project

Commenters suggest that the proposed Project would be inconsistent with the Restorative Justice Village Master Plan. In 2021, County of Los Angeles Supervisor Hilda Solis introduced a motion to create a Master Plan for housing services in the vicinity of the Men's Central Jail, called the "Restorative Justice Village Master Plan."³¹ Supervisor Solis' motion references Homeboy Industries' plans to expand its campus, via a partnership with the City to offer transitional housing and daycare and to increase capacity to offer programs and job opportunities to formerly incarcerated and previously gang-involved community members. The motion specifically discusses Homeboy Industries' anticipated transitional housing project at 903 North Main Street, described below. The "Hope Village Project,"³² is intended to serve a mix of unhoused and formerly incarcerated residents, integrating and connecting the Men's Central Jail, LA's Care First Village, Homeboy Industries, and The California Endowment's Center for Healthy Communities Campus.³³ The Restorative Justice Master Plan and Hope Village Project are intended to "tie together all nearby development," including other City and County partnerships.³⁴

Based on publicly available information from KFA Architecture and Urbanize Los Angeles, Homeboy Industries intends a five-story 36,000 square-foot transitional housing building with 157 residential units at the southeast corner of Alameda and Alpine Streets on 903 North Main Street.^{35, 36} According to KFA Architects' (the Homeboy Industries project's architect) website, the housing buildings would offer "support for the Homeboy population with dorm style apartments and supportive housing. The first phase

³¹ Revised Motion by Supervisor Hilda L. Solis for Restorative Justice Village Master Plan (January 26, 2021), available at <https://file.lacounty.gov/SDSInter/bos/supdocs/153341.pdf> (accessed September 20, 2023).

³² The Restorative Justice Master Plan and Hope Village Project are often described interchangeably, sharing common projects and goals. For instance, Homeboy Industries' architect KFA Architecture refers to the Homeboy Industries housing development project as "one component of a new 'Restorative Justice Village' planned for Chinatown," whereas Homeboy Industries' website describes this same project as the "Hope Village." (See KFA Los Angeles, Homeboy Industries Campus, <https://kfalosangeles.com/project/homeboy-industries-campus> (accessed September 20, 2023); Homeboy Industries, Campus Expansion and Transitional Housing, available at <https://homeboyindustries.org/hiltonfoundation/initiatives> (accessed September 20, 2023). Little detail as to the location and uses of the Restorative Justice Master Plan and Hope Village Project components are publicly available.

³³ Assemblywoman Wendy Carrillo, Assemblywoman Wendy Carrillo Announces \$5 Million in California State Budget Funds for Hope Village Project (Nov. 1, 2022), <https://a52.asmdc.org/press-releases/20221101-assemblywoman-wendy-carrillo-announces-5-million-california-state-budget> (accessed September 20, 2023).

³⁴ Revised Motion by Supervisor Hilda L. Solis for Restorative Justice Village Master Plan (January 26, 2021), available at <https://file.lacounty.gov/SDSInter/bos/supdocs/153341.pdf> (accessed September 20, 2023).

³⁵ KFA Los Angeles, Homeboy Industries Campus, <https://kfalosangeles.com/project/homeboy-industries-campus> (accessed September 20, 2023).

³⁶ Urbanize Los Angeles, Homeboy Industries expands into affordable housing (Oct. 8, 2021), <https://la.urbanize.city/post/homeboy-industries-expands-affordable-housing> (accessed September 20, 2023).

will also provide stacked parking, a gym, a mechanic's garage and outdoor recreational space . . . The new housing and accompanying structures wrap around a site which also fronts the intersection of Main and Vignes Streets."³⁷ The housing would be located on 903 North Main Street.

While little detail as to the location and uses of the Restorative Justice Master Plan and Hope Village Project components was publicly available, the Draft EIR considered proposed development projects in the vicinity of the proposed Project, using public information to the extent it was available. Table 5-1: Related Projects, in Section 5.0, Other CEQA Considerations, of the Draft EIR, lists 46 related land use development projects considered in the Draft EIR's analysis that are either approved or proposed, including Restorative Justice Master Plan and Hope Village projects, such as the interim housing facility at 1060 North Vignes Street (Related Project 34) and the 903 North Main Street proposed housing project (Related Project 43). The proposed Project would support the goals of the Restorative Justice Master Plan and Hope Village Project by offering an additional transit option in the area, enhancing connectivity in Downtown Los Angeles, by providing direct linkages to major residential, employment, and tourist destinations.

Accordingly, the Draft EIR considered and analyzed the proposed Project's consistency and potential impacts to all of the approved or proposed/anticipated housing projects along the proposed Project alignment, inclusive of the Restorative Justice Village Master Plan and Hope Village projects. Further, due to the minimal private property where aerial rights may be required for the proposed Project, other future housing or development projects may be similarly constructed.

The Project Does Not Impact Homeboy Industries' Housing Project

The proposed Project would not impair or impact either Homeboy Industries' current operations or their future housing development and expanded operations, or otherwise impact or impair Homeboy Industries' ability to deliver housing in response to the City and County's State of Emergency declarations regarding the homeless crisis. The proposed Alpine Tower is sited on 901 North Main Street and Homeboy Industries' housing project is located on 903 North Main Street.

In addition to the proposed Project's Alpine Tower not being physically located on the site of Homeboy Industries' anticipated housing project, the minimal aerial rights required for the proposed Project do not conflict with or impact the Homeboy Industries housing project.

The Alpine Tower's Location Considered and Avoided the 903 North Main Street Homeboy Housing Project

The Alpine Tower and Homebody Industries' housing project would be on separate parcels – the proposed location of the Alpine Tower is on 901 North Main Street, which is located across Alpine Street from the 903 North Main Street parcel where Homeboy Industries presumably intends to locate its anticipated housing project, as shown on the image below.

³⁷ KFA Los Angeles, Homeboy Industries Campus, <https://kfalosangeles.com/project/homeboy-industries-campus> (accessed September 20, 2023).



As discussed in Section 2.0, Project Description, of the Draft EIR, one of the proposed Project’s objectives is to “maximize the use of ROW, and publicly owned property and minimize aerial rights requirements over private properties, taking into account existing and future adjacent land uses,” and the proposed Project was designed in accordance with this objective. Further, as discussed on page 2-22 in Section 2.0, Project Description, of the Draft EIR, “[i]n the process of selecting tower locations, the proposed Project . . . considers the proposed Project’s relationship to existing adjacent and potential future land uses.”

The Project’s Alpine Tower would have a footprint of approximately 1,030 square feet on the northeast corner of Alameda Street and Alpine Street, adjacent to the Metro L Line (Gold) on 901 North Main Street, as shown in Figure 2-14: Proposed Alpine Tower Location, in Section 2.0, Project Description, of the Draft EIR. This proposed tower is located across Alpine Street from Homeboy Industries’ anticipated housing project on 903 North Main Street, as further depicted on the image above.

The Homeboy Industries Housing Project Was Considered a Related Project in the Draft EIR

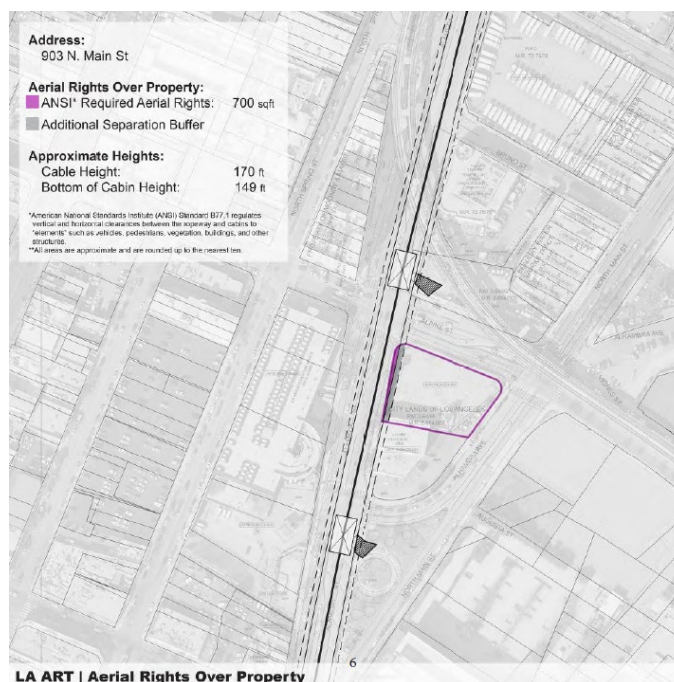
Table 5-1: Related Projects, in Section 5.0, Other CEQA Considerations, of the Draft EIR, lists Homeboy Industries' 157-dwelling unit anticipated housing development at 903 North Main Street as related project number 43. Figure 3.13-5: Noise Sensitive Receptors Map, in Section 3.13, Noise, of the Draft EIR, also lists Homeboy Industries' anticipated housing project as Noise Sensitive Receptor number 5, "Future Residential Development," and Vibration Sensitive Receptor number 11. Section 3.03, Air Quality, of the Draft EIR, and Appendix D, Air Quality/HRA Technical Report, of the Draft EIR, also identify Homeboy Industries' anticipated housing project as a sensitive receptor for the purposes of the Air Quality analysis and Health Risk Assessment. Accordingly, the Draft EIR considered Homeboy Industries' housing project in its analysis as one of the 46 related projects and as a sensitive receptor for the purposes of the air quality and noise and vibration analysis.

Aerial Rights Over 903 North Main Street

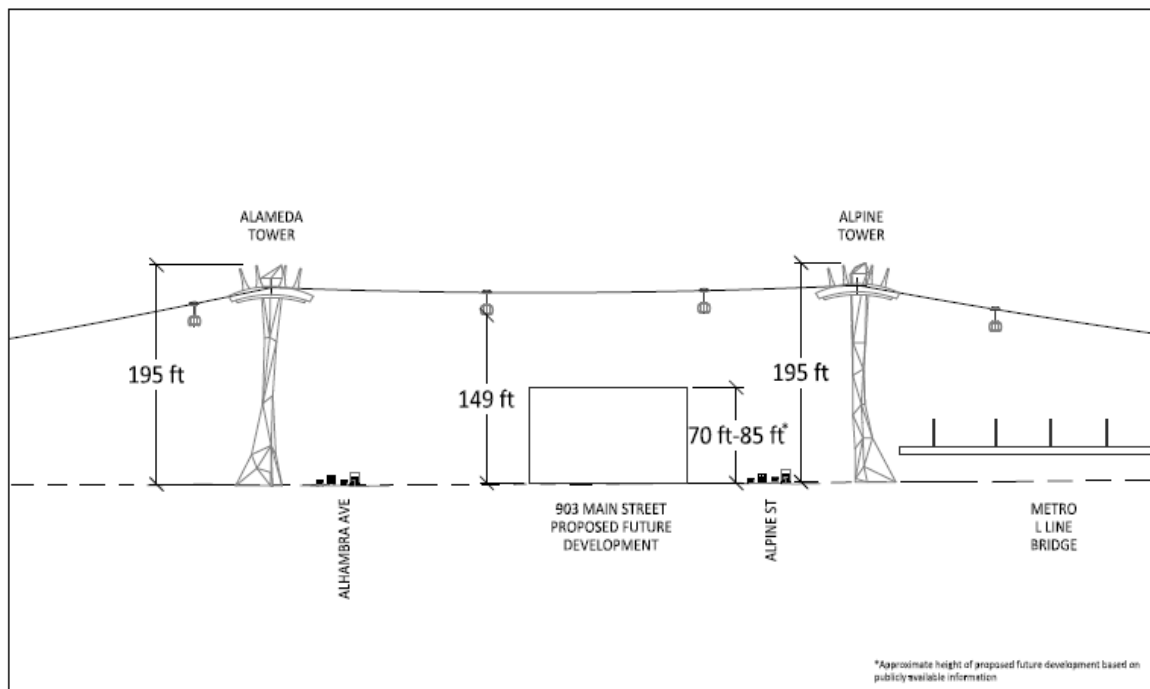
The proposed Project's minimal aerial rights requirement over 903 North Main Street would not interfere with Homeboy Industries' anticipated housing project.

As discussed in Section 2.4.6, Aerial Clearance, of the Draft EIR, the proposed Project will comply with industry standards for the design and operation of ropeways and cabins, including ANSI B77.1, regulating vertical and horizontal clearances between the ropeway and cabins to elements such as vehicles, pedestrians, vegetation, buildings, and other structures. As shown in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR, the proposed Project would require certain aerial rights over the edge of the property, which could be occupied in the future by Homeboy Industries' anticipated housing project in order to meet the industry standard clearance requirement.

The following image was included in Appendix Q of the Draft EIR:



The proposed Project is anticipated to require approximately 700 square feet of ANSI required aerial rights over 903 North Main Street, plus an Additional Separation Buffer.³⁸ Based on the publicly available information, Homeboy Industries' anticipated housing project at this location would be five stories. Based on the publicly available renderings on KFA Architect's website, Homeboy Industries' housing project appears to be Type III or Type V construction over a podium and appears to be approximately 70 feet high, and would be unlikely to exceed approximately 85 feet, which is the typical maximum height for Type III or Type V construction. ANSI B77.1 requires a vertical clearance of at least five feet over buildings. The proposed Project was designed to ensure that this clearance is met, as the bottom of the cabins would be 149 feet above ground and the cable would be 170 feet above ground. Accordingly, there would not be a conflict between Homeboy Industries' anticipated housing project and the required aerial clearances for the proposed Project. The proposed Project would substantially exceed the required aerial clearances from Homeboy Industries' anticipated housing project and would not impact either its construction or operation. The following segment of the proposed alignment's profile between Alameda Tower and Alpine Tower illustrates the proposed Project's relationship to Homeboy Industries' anticipated housing project, significantly exceeding the required clearances based on the publicly available information regarding Homeboy Industries' housing project.



LA ART | Segment of Proposed Alignment Profile with Homeboy Industries' Proposed Future Development at 903 North Main Street
SCALE: 3/16"=1' | 4/13/2023



Development of Housing Is Constrained on the Portion of 901 North Main Where Alpine Tower Is Located Due to the Proximity to the Metro L Line (Gold) Tracks

The proposed Alpine Tower would occupy approximately 1,030 square feet of 901 North Main Street on the northeast corner of Alameda Street and Alpine Street, adjacent to the Metro L Line (Gold). The proposed Alpine Tower is located on a triangular portion of 901 North Main Street between the Metro L

³⁸ Section 3.4.6, Aerial Clearance, of Section 3.0, Project Description, of the Final EIR details the proposed Project's Additional Separation Buffer.

Line (Gold) tracks and Alameda and Alpine Streets, this property was previously analyzed by the City of Los Angeles' City Administrative Officer, describing it as unsuitable for housing.³⁹ Based on publicly available information there is no housing proposed for this specific location, which is west of the Metro L Line (Gold) tracks on 901 North Main Street. The area east of the Metro L Line (Gold) tracks on 901 North Main Street would not be impacted by the proposed Alpine Tower.

The City of Los Angeles is currently in the process of transferring the City owned property at 901 and 903 North Main Street to Friends of Homeboy, LLC, on behalf of Homeboy Industries, pursuant to the City's Affordable Housing Opportunity Site program utilizing City owned properties that have been designated as surplus under the Surplus Land Act.⁴⁰ The City of Los Angeles' City Administrative Officer published a report on the proposed property transfer, determining that while 903 North Main Street was an appropriate site for affordable housing, "potential uses of [901 North Main Street] may be restricted to supplemental commercial uses related to affordable housing and services," due to the elevated Metro L Line (Gold) facilities. Specifically, the City recognized that the 901 North Main Street "site is bisected by overhead tracks, which are protected by an easement to" Metro and therefore "the Metro tracks will affect the ability to develop on the site."⁴¹

According to the City's Zone Information and Map Access System (ZIMAS), development and construction projects on 901 North Main Street must consult with Metro pursuant to Metro's Adjacent Development Review process to ensure safety and avoid conflicts related to transit services and operations. The process applies to work within 100 feet from Metro right-of-way, which affects most or all of the 901 North Main Street property.⁴² Metro's Adjacent Development Handbook⁴³ requires that building appurtenances and landscaping must be a minimum of 10 feet from Metro's overhead catenary system and support structures. If a transmission power feeder cable is present, a 20-foot setback from the overhead catenary system and support structures is required.

Compliance with Metro's requirements for construction design in locations adjacent to Metro's systems further restricts the ability for development on the portion of 901 North Main Street between the Metro L Line (Gold) tracks and Alameda and Alpine Street. Metro's Adjacent Construction Design Manual⁴⁴ incorporates all Federal, State, and internal Metro requirements for adjacent construction. Under these requirements, Metro must review and approve each part of the project's design to determine the effect of the proposed project on the Metro existing structures and its transit operations. Similar to Metro's Adjacent Development Handbook, the Design Manual requires that "[a]ll developments adjacent to Metro At-Grade Stations, Aerial Stations or Track Guideways shall provide a minimum 5 foot setback from the Metro and developer's shared property line to the outside face of the proposed structure at

³⁹ March 29, 2019, Letter from Richard H. Llewellyn, Jr., City Administrative Officer, to Los Angeles City Council regarding Recommendations for Proposed Transfer of 901 and 903 Main Street, Los Angeles, CA 90012, available at https://clkrep.lacity.org/online/docs/2018/18-0930_rpt_CAO_03-29-2019.pdf#page=3 (accessed September 20, 2023).

⁴⁰ Ibid.

⁴¹ *Id.*, pp. 2-3.

⁴² The 903 North Main Street property is also located within this area, according to ZIMAS.

⁴³ Los Angeles County Metropolitan Transportation Authority, Metro Adjacent Development Handbook (2021), <https://www.dropbox.com/s/3cddvf2og5jo5v6/2021-Adjacent-Development-Review-Handbook.pdf?dl=0> (accessed September 20, 2023).

⁴⁴ Los Angeles County Metropolitan Transportation Authority, Metro Design Criteria and Standards Adjacent Construction Design Manual (2018), <https://www.dropbox.com/s/c02lkxuvphbah1/2018-Adjacent-Construction-Design-Manual.pdf?dl=0> (accessed September 20, 2023).

Metro or the developer's property for maintenance to be performed or installed from the zone created by this setback[]".⁴⁵

These restrictions constrain the development potential for the portion of 901 North Main Street between the Metro L Line (Gold) tracks and Alameda and Alpine Streets where the Alpine Tower is proposed. Indeed, according to publicly available information,⁴⁶ Homeboy Industries is not proposing housing on 901 North Main Street. Homeboy Industries would still be able to develop the remainder of the 901 North Main Street property to the east of the Metro L Line (Gold) tracks with commercial and related uses to support its anticipated housing project and services at 903 North Main Street.

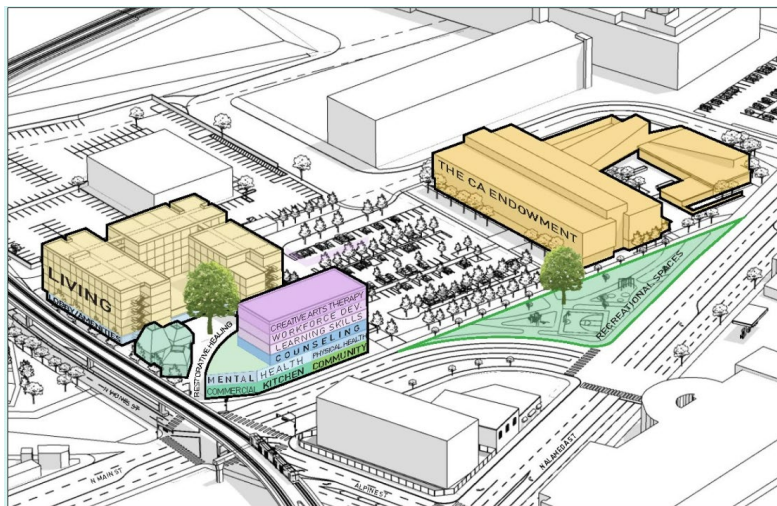
The Alpine Tower supports zero-emission transit in an area where approximately 25 percent of the residents utilize either public transportation or walking for commuting to work. This additional transit option would benefit existing and future residents in the proposed Project area. Moreover, the Project Sponsor has reached out to Homeboy Industries to express its desire to collaborate with Homeboy Industries to support Homeboy's housing project, such as the potential to provide a symbiotic use at the base of the Alpine Tower, including potential Homeboy Industries signage, shade structures, seating, hardscape and landscape enhancements and other pedestrian enhancements.

The Proposed Project Does Not Impede The California Endowment's Anticipated Hope Village Project

Subsequent to the release of the Draft EIR, The California Endowment published its Annual Report 2023⁴⁷ with additional information regarding the Hope Village, which anticipates offering housing, community, and health services to formerly incarcerated, unhoused, and economically disadvantaged residents.

A graphic in the Annual Report 2023 depicts the Alameda Triangle, a City ROW between Alameda Street, North Main Street, and Alhambra Avenue, as "RECREATIONAL SPACES."

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



⁴⁵ Ibid.

⁴⁶ See, e.g., KFA Los Angeles, Homeboy Industries Campus, <https://kfa.losangeles.com/project/homeboy-industries-campus> (accessed September 20, 2023).

⁴⁷ The California Endowment, Annual Report 2023 (2023), <https://www.calendow.org/annual-report> (accessed September 20, 2023).

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

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



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

Further, the proposed Project alignment travels along Alameda Street, and, as shown in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR, does not require any aerial rights over the properties that The California Endowment anticipates building its housing or community and health services. Accordingly, the proposed Project would not impede The California Endowment's anticipated housing, community and health services, or recreational spaces, based on the available information.

Pursuant to CEQA Guidelines sections 15125 and 15130, the Draft EIR should consider conditions as they exist at the time the notice of preparation is published, and include a cumulative impacts analysis of past, present, and probable future projects. The notice of preparation for the proposed Project was published

on October 1, 2020. As of October 2023, The California Endowment has yet to file an application for the anticipated Hope Village project, and therefore the project need not be treated as a present or probable future project for the purposes of environmental review. Further, The California Endowment has not publicly released any further details other than those outlined above in its Annual Report 2023. CEQA does not require speculation as to potential related impacts, and therefore no additional analysis is required.⁴⁸) Any potential impacts regarding proximity of the proposed Project have been addressed with respect to the adjacent The California Endowment building, which was included as a sensitive receptor for the purposes of the Draft EIR's analysis. The proposed housing and community services are located further away from the Alameda Tower site than The California Endowment, so potential impacts are expected to be less.

Surplus Land Act

Comments regarding the Surplus Land Act do not raise substantive issues on the content of the Draft EIR and therefore no response is warranted pursuant to CEQA. Regardless, the proposed Project will comply with all State laws, including the Surplus Land Act.⁴⁹

The Surplus Land Act requires local agencies to declare land as either “surplus land” or “exempt surplus land,” as supported by written findings before the local agency may take any action to dispose of the land consistent with an agency’s policies or procedures.⁵⁰ The SLA and related Guidelines published by the California Department of Housing and Community Development (HCD) ⁵¹ set forth procedures applicable to the disposition of surplus land or exempt surplus land.

Metro and the City will exercise their independent judgment regarding the disposing of any Metro or City-owned land that may be necessary for the proposed Project, which may require compliance with the Surplus Land Act, and will act in conformance with the law, including seeking guidance from HCD as reasonably necessary to ensure compliance with the SLA.⁵² Compliance with the Surplus Land Act, should it apply, is separate and distinct from the CEQA environmental process and the purpose of environmental review.

Gentrification and Displacement

The proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro’s considerations regarding gentrification and displacement. Metro recognizes that gentrification is “a process of neighborhood change in a historically disinvested neighborhood . . . by means of real estate investment,” including the “changes that happen when new, higher-income residents move in,” including potential displacement of existing residents.⁵³ As discussed in Section 3.14, Population and Housing, of the Draft EIR, no displacement of existing residences or housing would occur in connection with construction or operation of the proposed Project, which

⁴⁸ CEQA Guidelines Section 15145.

⁴⁹ California Government Code. 2009. Section 54220 et seq.

⁵⁰ California Govnment Code. 2009. Section 54221(b)(1).

⁵¹ https://www.hcd.ca.gov/community-development/docs/sla_guidelines_final.pdf.

⁵² As noted above, the City owned property where Alpine Tower would be located has already been deemed surplus and is in the process of being transferred to Friends of Homeboy, LLC, on behalf of Homeboy Industries, pursuant to the City’s Affordable Housing Opportunity Site program.

⁵³ <https://www.metro.net/about/gentrification-displacement/>.

would operate primarily over the public ROW. Further, the proposed Project does not include any new housing and is a first-mile/last transit connection to Dodger Stadium for existing residents, workers, park users, and visitors to Los Angeles.

As discussed in Section 3.14, Population and Housing, of the Draft EIR, the proposed Project would increase connectivity in downtown Los Angeles by providing direct linkages to major residential, employment, and tourist destinations, such as LAUS, El Pueblo/Olvera Street, Chinatown, Los Angeles State Historic Park, Dodger Stadium, and Elysian Park. The Project Study Area includes a population of which approximately 25 percent of the residents in the Project Study Area utilize either public transportation or walking for commuting to work. The proposed Project would enhance community connectivity for existing residents by providing direct linkages to major residential, employment, and tourist destinations, including to the second largest public parks and recreation area in Los Angeles—Elysian Park. Further, the proposed Project is located adjacent to existing transit stops at LAUS and the Metro L Line (Gold) Chinatown Station; any gentrification due to the construction of a transit facility would have already resulted due to these existing transit options. No gentrification or displacement would result from the construction of Dodger Stadium Station, which would be located on the Dodger Stadium property in a portion of the existing parking lot for the Stadium.

Consistent with Metro’s plans regarding gentrification and displacement, the proposed Project would “support and strengthen opportunities for small and local businesses, and preserve and enhance communities’ cultural assets.” The proposed Project’s partnerships and benefits to local businesses and opportunities to showcase local artists, as well as the immediate neighborhood culture’s influence on the proposed Project’s design is discussed in Topical Response C, Project Features.

The Project Will Not Take Funding from Housing Projects

Commenters suggest that funding for the proposed Project will be diverted from funding for housing projects. Section 4.0, Costs and Financing, of this Final EIR, discusses potential funding for the proposed Project. No funding benchmarked for housing projects or development will be used to fund or finance the proposed Project.

TOPICAL RESPONSE F**Los Angeles State Historic Park**

Comments on the Draft EIR suggest California Department of Parks and Recreation’s (“State Parks”) does not have the authority to grant the necessary approvals for the proposed Project’s use of Los Angeles State Historic Park (“LASHP” or “Park”). As detailed in this topical response, State Parks has the authority to grant the necessary approvals for the proposed Project. State Parks will undertake its own review of the proposed Project when the Project Sponsor seeks approvals for its use of LASHP from State Parks.

Because comments regarding State Parks’ authority to grant the necessary approvals for the proposed Project’s use of LASHP do not raise substantive issues on the content of the Draft EIR, no further response is required by CEQA. Nevertheless, this topical response provides information regarding State Parks’ authority to grant the necessary approvals for the proposed Project’s use of LASHP.

California Department of Parks and Recreation’s Authority to Permit Project**State Parks Has Authority to Grant Project Approvals**

As discussed in Section 2.10, Required Permits and Approvals, of the Draft EIR, approvals determined necessary by State Parks for the proposed Project’s use of LASHP could include, but are not necessarily limited to:

- a. Pursuant to Government Code section 14666, an easement and/or aerial easement, to construct and operate the Project within/over the Los Angeles State Historic Park.
- b. Pursuant to Public Resources Code section 5003.17, a lease or other agreement, to construct and operate the Project within/over the Los Angeles State Historic Park.
- c. Pursuant to Public Resources Code section 5003 and Government Code section 14666, a right of entry, to construct the Project within/over the Los Angeles State Historic Park.
- d. Pursuant to Public Resources Code section 5002.2, an amendment to the Los Angeles State Historic Park General Plan.

Title to real property owned by State Parks is vested in the name of the State of California.

State Parks’ transfer of real property interests through lease or easement requires the review and approval of Department of General Services (“DGS”) per Government Code section 11005.2.⁵⁴

Right-of-Entry Permits

Under State Parks’ general authority, State Parks “may establish rules and regulations not inconsistent with law for the government and administration of the property under its jurisdiction. The department may expend all moneys of the department, from whatever source derived, for the care, protection, supervision, extension, and improvement or development of the property under its jurisdiction.”⁵⁵ Within this authority, State Parks can issue Right-of-Entry Permits.

⁵⁴ California Government Code. 2019. Section 11005.2.

⁵⁵ California Public Resources Code. 1983. Section 5003.

Right-of-Entry Permits, issued at the District level and reviewed by State Parks' Acquisition and Real Property Services Division, are for a short-duration use of state park property. A Right-of-Entry Permit is a revocable, short-term permit. Therefore, they are not considered an encumbrance in the same way as an easement or lease.

Leases and Easements

Other real property transactions such as the granting of an easement to a private party not performing a public service or entering into leases for any use may be carried out by DGS, as applicable, on behalf of State Parks with State Parks' approval, if the transactions meet certain statutory requirements.

Public Resources Code section 5003.17 authorizes and provides, among other things, that State Parks may lease for a term not exceeding ten years, for any use at fair market value, all or a portion of any parcel of the State Park System if the State Parks Director finds that the use would be compatible with the use of the real property as a unit and with the sound management and conservation of resources within the unit. Leases beyond ten years are allowed if the proposed lease is provided to the Joint Legislative Budget Committee along with "sufficient documentation to enable the joint legislative budget committee to determine whether the lease conforms to the requirements of [state law] and to evaluate fully all terms upon which the lease is proposed to be let, including the amount of the rent and other revenues that may be generated under the lease."⁵⁶ () Thus, prior to entering into a lease for the proposed Project, the State Park Director would ensure that the proposed Project pays fair market value⁵⁷ and that the use is compatible with (1) the use of LASHP as a unit and (2) the sound management and conservation of resources within LASHP.

State law provides two provisions related to easements on State Parks property: Public Resources Code section 5012 and Government Code section 14666. Only Government Code section 14666 is potentially applicable to the proposed Project.

Commenters assert that Public Resources Code section 5012 precludes State Parks from issuing the required approvals. Section 5012 authorizes State Parks to grant permits and easements to public agencies for utilities and public roads and to grant other utility easements or to perform a public service, upon application by the proper authorities. However, as the private Project Sponsor is not a public agency, this provision is not applicable.

Instead, real property transactions such as a sale of property, granting of an easement, or an acquisition of real property may be carried out by DGS on behalf of the State Parks with State Parks' approval, if the transactions meet statutory requirements.

Government Code section 14666 states: "With the approval of the state agency concerned, the [DGS] director may grant and convey in the name of the state, easements and rights-of-way across real property belonging to the state not used for highway rights-of-way or high-speed rail rights-of-way, for those purposes and upon that consideration and subject to those conditions, limitations, restrictions, and reservations as the director deems are in the interest of the state."⁵⁸ Thus, with the approval of State

⁵⁶ California Public Resources Code. 2017. Section 5003.17(d).

⁵⁷ Paying fair market value would ensure that the proposed Project does not receive a "gift" from the State or any of its political subdivisions in compliance with Article XVI, Section 6 of the California Constitution.

⁵⁸ California Government Code. 2014. Section 14666.

Parks, the DGS director may grant required easements and rights-of-way across LASHP for the proposed Project.

State Parks’ Considerations When Granting Approvals

Commenters raise several provisions of the Public Resources Code that provide directives to State Parks on how it should manage the State Park System.⁵⁹ State Parks will assess the proposed Project against its statutory authorities when the Project Sponsor seeks its approvals for use of LASHP from State Parks in the future. That said, as discussed in the Section 3.16, Parks and Recreational Facilities, and Section 3.11, Land Use and Planning, of the Draft EIR, the proposed Project would be consistent with the goals and guidelines of the LASHP General Plan, including those that focus on recreation, aesthetics, interpretation, and access and circulation.

Section 5001 is the Legislative findings section of the Public Resources Code regarding the State Park System. It provides the broad declaration that state parks “deserve to be preserved and managed for the benefit and inspiration of all state residents and visitors to the state parks.”⁶⁰ As discussed in Section 3.11, Land Use and Planning, of the Draft EIR, the proposed Project is consistent with this goal by providing enhanced access and facilities so that even more residents and visitors can enjoy LASHP. As discussed in Table 3.11-1, Project Consistency with Applicable Los Angeles State Historic Park General Plan Policies, in the Draft EIR, the proposed Project

would provide a connection from the Los Angeles State Historic Park to other local transit lines along the proposed Project alignment and the regional transit system accessible at [Los Angeles Union Station]. Specifically, the Chinatown/State Park Station would provide transit access to the Los Angeles State Historic Park and to nearby neighborhoods and land uses, including Chinatown, Elysian Park, Solano Canyon, and the Mission Junction neighborhood, which includes the William Mead Homes public housing complex, and the Los Angeles River. The Chinatown/State Park Station would also include a mobility hub where passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program.

Public Resources Code section 5001.2 states that “[t]he director shall promote and regulate the use of the state park system in a manner that conserves the scenery, natural and historic resources, and wildlife in the individual units of the system for the enjoyment of future generations.”⁶¹ As discussed in Section 3.01, Aesthetics, Section 3.04, Biological Resources, and Section 3.05 Cultural Resources, of the Draft EIR, there are no significant and unavoidable impacts to aesthetics, biological resources, or cultural resources, related to the proposed Project’s use of the LASHP and the proposed Project will enhance the enjoyment of LASHP by providing increased access and visitor use facilities. See also Appendix H.2, Supplemental KOPs in Response to Comments, and Appendix G, Supplemental Biological Resources Report, of the Final EIR, and Appendix C, Visual Impact Assessment, Appendix E, Biological Resources Assessment, Appendix F, Archaeological and Paleontological Resources Assessment, and Appendix G, Historical Resources Technical Report, of the Draft EIR.

⁵⁹ See, e.g., California Public Resources Code Sections 5001, 5001.2, 5019.53, and 5019.59.

⁶⁰ California Public Resources Code. 2016. Section 5001.

⁶¹ California Public Resources Code. 2016. Section 5001.2.

As discussed in Section 3.11.3, Land Use and Planning, of the Draft EIR, Public Resources Code section 5019.59 permits facilities in historical units of the State Park system related to the safety, comfort, and enjoyment of the visitors, “such as access, parking, water, sanitation, interpretation, and picnicking.”⁶² The use of the term “such as” denotes that the list of allowable facilities is not exhaustive. But, in any event, it explicitly provides that facilities related to access are those types of facilities that are permitted. Commenters opine on the use of the word “required” in section 5019.59, arguing that because the proposed Project is not “required” to provide access, it is not an allowable use. However, the plain text of the section makes clear that the word “required” is describing the general types of uses that are allowed, such as access, and not describing every individual facility. If read as the commenters suggest, then no facilities would ever be allowed because no individual facility is “required.” Nothing in section 5019.59 would prohibit State Parks from issuing the necessary approvals for the proposed Project.

Section 5019.53 states that “[i]mprovements undertaken within state parks shall be for the purpose of making the areas available for public enjoyment and education in a manner consistent with the preservation of natural, scenic, cultural, and ecological values for present and future generations.”⁶³ The proposed Project will enhance LASHP by providing greater access, providing approximately 740 square feet of concessions, 770 square feet of restrooms, and a 220 square foot covered breezeway connecting the concessions and restrooms, providing a mobility hub where passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program. Pedestrian access improvements could include pedestrian improvements between Metro’s L Line (Gold) Station and Chinatown/State Park Station consistent with the Connect US Action Plan, including hardscape and landscape improvements, shade structures, and potential seating. These improvements could help to bring awareness of LASHP to thousands of people each year. Nothing in section 5019.53 would prohibit State Parks from issuing the necessary approvals for the proposed Project.

Provisions Cited By Commenters Allegedly Prohibiting State Parks From Granting Approvals Are Not Applicable

Commenters suggest certain other provisions of the Public Resources Code prohibit State Parks from granting the necessary approvals for the proposed Project’s use of LASHP. Commenters misconstrue those provisions of law.

Public Resources Code section 5003.5 provides State Parks with authority to “provide means of ingress to and egress from all state parks in order to provide ready access thereto by the public and to provide means of ingress and egress to highways and roads across state parks from lands separated from such highways and roads by state parks. . . .”⁶⁴ As a threshold matter, the proposed Project is not seeking to provide means of ingress and egress to highways and roads across state parks from lands separated from such highways and roads by state parks. Thus, State Parks does not need to “determine whether any reasonable access exists outside the boundaries of the park, or could be economically constructed.” Indeed, the only provision of Public Resources Code section 5003.5 that arguably applies to the proposed Project is the general authority provided to State Parks to “provide means of ingress to and egress from all state parks in order to provide ready access thereto by the public.” Because the proposed Project will

⁶² California Public Resources Code. 2001. Section 5019.59.

⁶³ California Public Resources Code. 2001. Section 5019.53.

⁶⁴ California Public Resources Code. 1959. Section 5003.5.

be providing a means of ingress to and egress from LASHP, section 5003.5 allows State Parks to authorize the proposed Project.

As discussed above, Public Resources Code section 5012 is also inapplicable to the proposed Project. Section 5012 permits State Parks to grant easements and permits for certain public utility and other public uses (e.g., roads, bicycle and pedestrian trails, etc.). However, this section does not prohibit other authorized types of easements, permits, and leases that are expressly permitted by other statutory grants as discussed above.

Commenters assert that the prohibition in Public Resources Code section 5001.65 on “commercial exploitation of resources in units of the state park system” categorically prohibits State Parks from issuing the required approvals for the proposed Project. This reading of section 5001.65 is incorrect. The State Legislature did not define “commercial exploitation” in section 5001.65, but the exceptions noted therein for oil or gas directional drilling, commercial fishing, taking of mineral specimens for recreational purposes from state beaches, state recreation areas, or state vehicular recreation areas indicate examples of commercial exploitation. Unlike some commenters’ assertion that section 5001.65 acts as a prohibition on all commercial use of the state park system, it is clear that the Legislature was focused on the commercial exploitation of tangible resources like minerals and biological resources that can be extracted from certain state lands.

Commenters’ broad reading of section 5001.65 would render moot various State Parks laws and regulations that explicitly allow commercial uses of the state park system with permits.⁶⁵ Indeed, commenters’ interpretation would prohibit the many commercial events (e.g., music festivals and farmers markets) that regularly occur at LASHP each year. (See, e.g., Draft EIR, § 5.5.2, Special Events at the Los Angeles State Historic Park [noting the LASHP hosts large events with up to 25,000 people and smaller monthly events of 500 to 5,000 people, including concerts, movie screenings, and festivals].)

As one commenter correctly notes, the Public Park Preservation Act is not applicable to the approvals that the proposed Project will seek from State Parks. The Public Park Preservation Act requires public entities which are acquiring public parkland to pay or transfer to the legislative body operating the park sufficient compensation or land to replace the park land that is being acquired. The Project Sponsor, which is not a public entity, is not seeking to “acquire” any real property that is public parkland for the proposed Project. Instead, the Project Sponsor is seeking land use approvals from State Parks to permit the proposed Project to use a portion of LASHP. Thus, the Public Park Preservation Act does not impose any requirements on the proposed Project and, as such, does not provide any informational value.

LASHP General Plan Amendment

As discussed in Section 3.11, Land Use and Planning, of the Draft EIR, the proposed Project’s Chinatown/State Park Station would be consistent with the goals and guidelines of the LASHP General Plan, including those that focus on recreation, aesthetics, interpretation, and access and circulation and thus would not conflict with its goals, policies, and objectives that were adopted for the purpose of avoiding or mitigating an environmental effect.

⁶⁵ See, e.g., California Public Resources Code Section 5080.03 [permitting State Parks to enter concessions contracts with corporations] and 14 Cal. Code Regs. § 4316 [allowing commercial filming with a permit].

State Parks has determined that the proposed Project would be inconsistent with the LASHP General Plan because the identified land uses in the General Plan's Preferred Park Concept Elements did not contemplate a transit station like the proposed Project's Chinatown/State Park Station. State Parks considers this inconsistency a potentially significant impact. Therefore, Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain an amendment to the Los Angeles State Historic Park General Plan ("LASHP General Plan Amendment"). The LASHP General Plan Amendment proposes to amend the Preferred Park Concept Elements to include a "Transit" land use to allow for the proposed Project's use, as well as to address the state historic park classification as defined in Public Resources Code section 5019.59, which permits facilities for the comfort and enjoyment of the visitors, such as access. No other inconsistencies with LASHP General Plan policies were identified during the analysis, and therefore no other mitigation measures are required.

The LASHP General Plan Amendment, including any actions to address the state historic park classification as defined in Public Resources Code section 5019.59, is subject to the review and approval by the State Park and Recreation Commission, which retains its independent authority related to the proposed Project under Public Resources Code section 21174. Because the EIR analyzes all direct and indirect physical impacts to the environment associated with the permits and approvals outlined in Section 2.10, Required Permits and Approvals, of the Draft EIR, including the LASHP General Plan Amendment, the State Park and Recreation Commission will be able to rely on the EIR to support its discretionary action as a Responsible Agency pursuant to CEQA.

Consistency with the Transportation Theme of the Park

Metro and the Project Sponsor acknowledge the decades of planning and organizing that the community undertook to create a world-class park in the center of Los Angeles. This planning resulted in "a strong consensus around a vision for the Cornfield site incorporating four central themes: cultural-historical, including the role of water in the development of the region; connectivity; recreation; and transportation."⁶⁶

The LASHP General Plan identifies transportation as a "primary theme" of the park, recognizing the site's long history of transportation uses. The General Plan states: "The movement of people and products has enabled Los Angeles to become the megalopolis it is today. The Park site has been a route of transportation and commerce throughout its history. Located within bustling transportation and river corridors, the Park provides a place to reflect on the commercial and industrial activities that have shaped the city."⁶⁷

This transportation theme has been central to LASHP planning. The Cornfield State Park Advisory Committee was directed by Senate Bill 1177 to prioritize a list of recommendations for both interim and permanent land uses and facilities at the LASHP site. In April 2003, the Advisory Committee presented a recommendations report, "A Unified Vision for Cornfield State Park," to the State Parks Director, outlining a long-term vision and essential themes for park development, which included transportation.

⁶⁶ Cornfield State Park Advisory Committee. 2003. Recommendations Report. Available at: <https://www.parks.ca.gov/pages/21491/files/RecommendationsReport.pdf> (accessed August 2023).

⁶⁷ California State Department of Parks and Recreation 2005. Los Angeles State Historic Park General Plan and Final Environmental Impact Report. Available at: <https://lastatehistoricpark.org/wp-content/uploads/2021/07/LASHP-General-Plan.pdf> (accessed September 2023).

The Unified Vision for Cornfield State Park discussed the importance of transportation as a key theme of the park and how State Parks could incorporate this history into its planning for LASHP:

Transportation has long been prominently associated with the Cornfield site, from the railroads and trolleys in the recent past to the Gold Line currently under construction and the freeways that criss-cross the neighboring communities. ***Design could both recognize this history and embrace environmentally-friendly transportation systems within the Cornfield, its adjacent communities and all nearby cultural and recreational points of interest.***

Because pedestrian access has some limitations, shuttle buses, historic trolleys, and bike paths as well as walking paths should provide the basis for a “heritage trail” connecting other park or destination sites. The park could address the unique historical transportation linkages of the site through use, for example, of the rail cars from the age of steam and diesel at Traveltown, which would move back and forth as a linkage between the parks.

To address the traffic calming issue, park planning should also recognize safe passages to surrounding communities and pedestrian linkages, particularly in routing the commuter bikeway from the Valley into Union Station. ***Transportation within the park, whether pedestrian, equestrian, bicycle, transit, parking or national historical trails, should link up with systems outside the park.*** Transportation systems must be integral to park and recreation uses and designed in a manner consistent with retaining, to the maximum extent possible, land available for other park purposes.⁶⁸

Thus, while a transit use is not included in the Preferred Park Concept of the General Plan, “environmentally-friendly transportation systems within” the park that “link up with systems outside the park,” are consistent with the Park’s planning documents.

In summarizing the Park’s “unit classification,” the LASHP General Plan states:

This park’s historical significance transcends its historic uses and existing resources and is also linked to its role at the origin of Los Angeles’ meteoric rise from remote frontier community to 21st Century urban megalopolis and international economic power. Its association with the first public works project (*zanja madre*) and early agriculture, its donation to the Southern Pacific Railroad as enticement to bring the transcontinental link to Los Angeles in the 1870s, and its role as a pioneer and catalyst for the City and region’s unprecedented commercial, industrial, and social growth make it a unique place for tracing Los Angeles’ cultural history from its origins to today.⁶⁹

As a safe, zero emissions, environmentally-friendly, and high-capacity transit option which operates daily to link the Dodger Stadium property, Elysian Park, and the neighborhoods along the proposed alignment to the region’s rapidly growing regional transit system at LAUS, the proposed Project advances this

⁶⁸ Cornfield State Park Advisory Committee. 2003. Recommendations Report. Available at: <https://www.parks.ca.gov/pages/21491/files/RecommendationsReport.pdf> (accessed August 2023).

⁶⁹ California State Department of Parks and Recreation 2005. Los Angeles State Historic Park General Plan and Final Environmental Impact Report. Available at: <https://lastatehistoricpark.org/wp-content/uploads/2021/07/LASHP-General-Plan.pdf> (accessed September 2023).

historical transportation theme while simultaneously providing the community a 21st century transportation option. In addition, the Chinatown/State Park Station would also include passenger amenities, including approximately 740 square feet of concessions, 770 square feet of restrooms, and a 220 square foot covered breezeway connecting the concessions and restrooms. The Chinatown/State Park Station would also include a mobility hub where passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program. Pedestrian access enhancements could include pedestrian improvements between Metro’s L Line (Gold) Station and the Chinatown/State Park Station consistent with the Connect US Action Plan, including hardscape and landscape improvements, shade structures, and potential seating, as well as support for the future Los Angeles State Historic Park bike and pedestrian bridge. The Chinatown/State Park Station would provide passenger access to Chinatown, LASHP, and to nearby neighborhoods and land uses, including the Mission Junction neighborhood, which includes the William Mead Homes public housing complex. Refer to Topical Response C, Project Features, for a discussion of the proposed Project’s features to enhance and provide additional benefits to LASHP and the surrounding communities.

Additionally, to honor and connect to the Park’s history even further, the Project Sponsor has committed to work with State Parks to develop an “Interpretation Plan” to identify unique ways to use the proposed Project to provide additional interpretation at the park, particularly aimed at a diverse visitor community. The Interpretation Plan would be a strategic document that outlines the key elements required to design and implement interpretation programs associated with the proposed Project. The goal of this plan is to develop a program that will provide all visitors with an engaging and informative experience that will enhance their understanding and appreciation of LASHP’s culture and history. The Interpretation Plan will include a detailed description of the history and significance of LASHP and will assess the existing interpretive resources within the Park. Based on this analysis, the Interpretation Plan will outline the overarching goals and objectives of the interpretation program, as well as the key themes and messages that will be conveyed to visitors.

The Interpretation Plan would also include a detailed description of the interpretive media and methods that will be used to deliver these messages effectively. This may include signage, exhibits, audiovisual presentations, guided tours, and other interactive experiences.

Overall, the Interpretation Plan will help ensure that the proposed Project is a benefit to LASHP by providing visitors with an engaging and informative experience that deepens their understanding and appreciation of LASHP’s culture and history with regard to the history of transportation within and around Los Angeles. And while the proposed Project deepens the Park’s connection to its transportation theme, it has been designed to avoid impacts to the other themes—recreation, cultural-historic, and connectivity—by careful siting and collaboration with State Parks. The Park will remain a green space to gather for small (family picnics and quiet walks) and large functions (community programming and festivals) alike.

LASHP General Plan EIR Mitigation Measure

Some commenters claim that the proposed Project is “disregarding” or “modifying” an adopted mitigation measure in the LASHP General Plan EIR. The referenced mitigation measure (Aes-1) requires State Parks

to review potential aesthetic quality impacts associated with new facilities and implement design practices that reduce those facilities' overall negative aesthetic effect.

The proposed Project does not “disregard” or “modify” this mitigation measure, which applies to State Parks' actions and does not apply to the proposed Project.

But, in any event, the Project Sponsor has been working cooperatively with State Parks to avoid or minimize impacts, including aesthetic impacts to LASHP, thus helping State Parks meet its obligations pursuant to this mitigation measure.

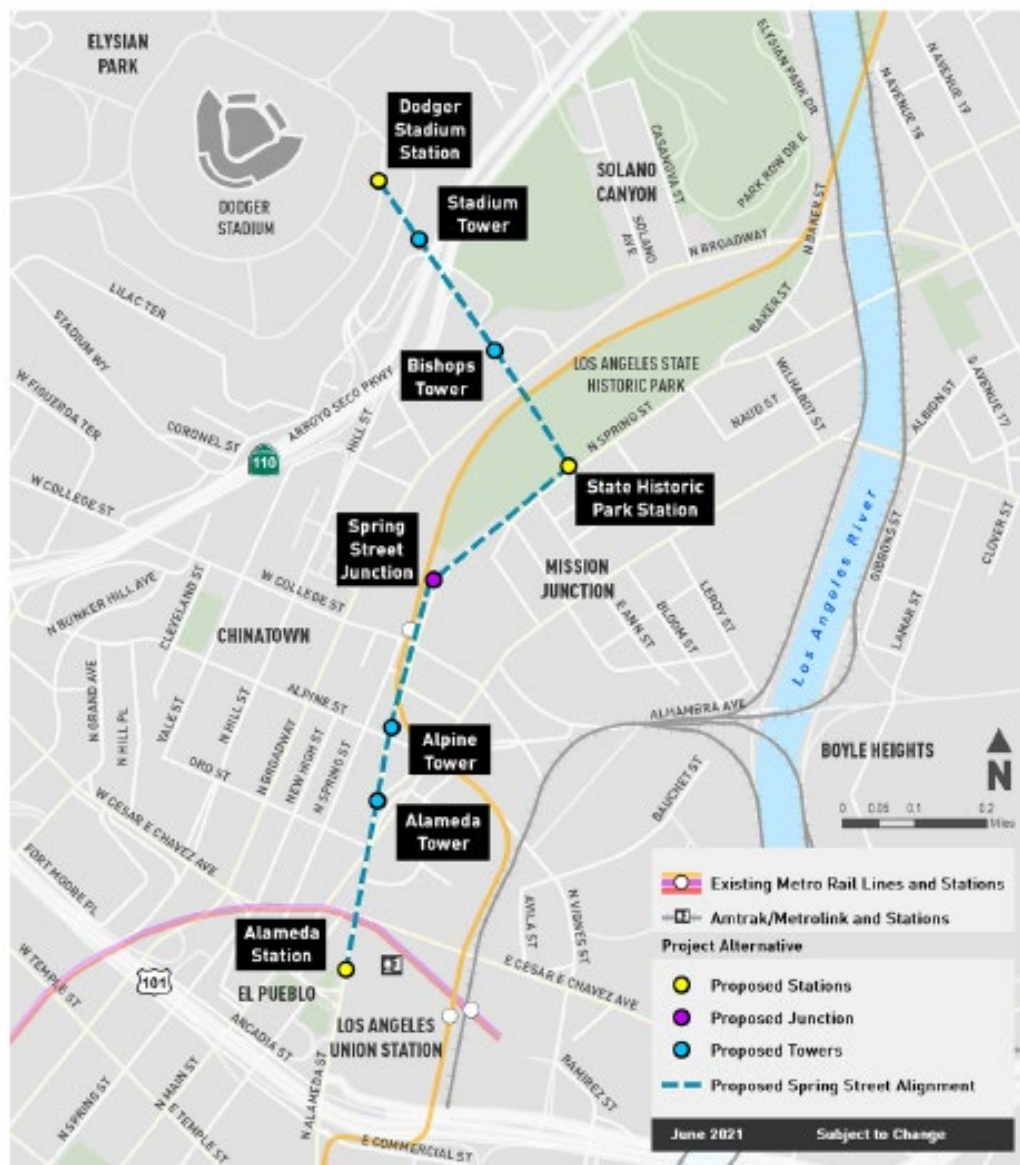
Indeed, in response to LASHP stakeholders' comments on the proposed Project's Notice of Preparation and discussions with State Parks, the following design considerations have been incorporated into the proposed Project to minimize the aesthetic effect of the proposed Project on LASHP:

- Unlike the Spring Street Alignment Alternative, studied in Section 4.0, Alternatives, of the Draft EIR, where cables and cabins associated with the proposed Project would be visible over the middle of the Park, the proposed Project alignment crosses over the westernmost edge of the LASHP, parallel to an existing access road and overhead utility lines on North Broadway, and adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system to reduce visual and operational impacts to LASHP.⁷⁰
- Also, unlike the Spring Street Alignment Alternative, where there would be a station in the middle of LASHP, the Chinatown/State Park Station would be located adjacent to Spring Street in the southernmost portion of the Los Angeles State Historic Park. The southern portion of the station would be located on City ROW, while the northern portion of the station would be integrated into the southern boundary of the Los Angeles State Historic Park. Any impacted trees will be relocated or replaced in coordination with State Parks. The location of the Chinatown/State Park Station also avoids adjacent private properties while maintaining transit access to surrounding communities within a half mile walkshed to transit, including the LASHP, Chinatown, Mission Junction including William Mead Homes, Los Angeles River, and North Broadway.
- The Project Sponsor worked with State Parks to select the site for the Chinatown/State Park Station to improve and balance pedestrian flow into the park, and to determine what other improvements would further enhance the visitor experience.
- To soften the visual effect of the Chinatown/State Park Station on LASHP, the size and scale of the station were reduced.
- The Draft EIR provides support for the future Los Angeles State Historic Park pedestrian bridge, the potential for which was analyzed in the LASHP General Plan and Final EIR. While the pedestrian bridge is not proposed as part of the proposed Project, the Draft EIR includes an

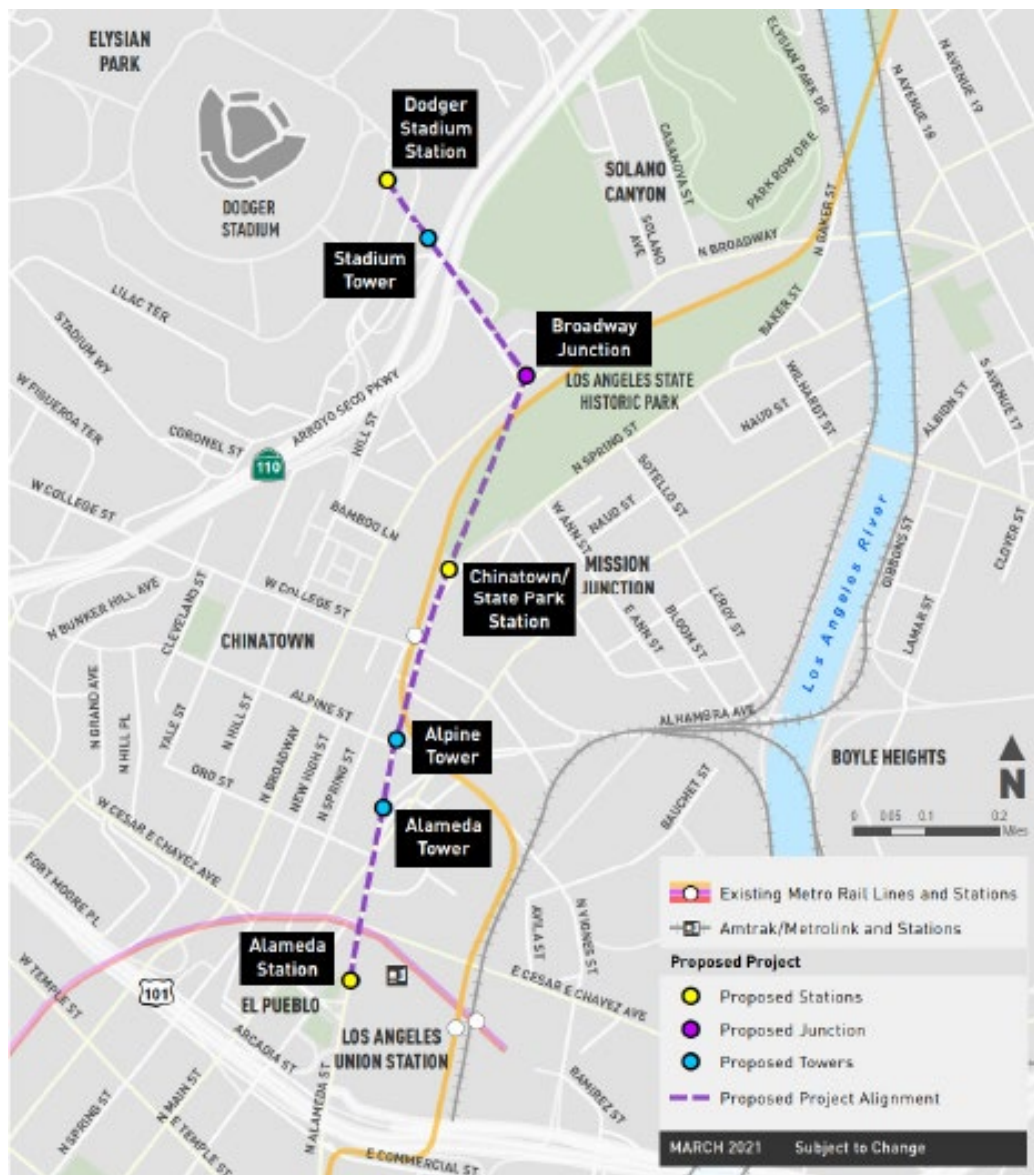
⁷⁰ The Notice of Preparation (“NOP”) for the proposed Project included two alternative alignments, for providing transit service adjacent to (the Broadway Alternative), and flying over (the Spring Street Alternative) the LASHP. Several comments on the NOP requested an intermediate station closer to Chinatown to bring business into the commercial area and to offer another travel mode choice so as to alleviate parking problems in the area, rather than the intermediate station proposed under the Broadway Alternative (now the “Broadway Station Alignment Alternative”). And a majority of commenters expressed a preference for the proposed Project alignment over the Spring Street Alternative (now the “Spring Street Alignment Alternative”), to avoid flying over the middle of the LASHP. (See Appendix A, Scoping Report, of the Draft EIR, Attachment F, for copies of written comments submitted during the public scoping period, and a verbatim transcript of comments received during the scoping meeting).

analysis of the pedestrian bridge for the LASHP as Design and Use Option E. The pedestrian bridge could provide much needed access to LASHP for neighborhoods at the park's northern boundary.

- Project lighting would include low-level lighting for security and wayfinding purposes. Exterior lighting would be shielded or directed toward the areas to be lit to limit spillover onto adjacent properties and off-site uses, and would meet all applicable Los Angeles Municipal Code lighting standards.
- Chinatown/State Park station would include the installation of landscaping and hardscaping, including integration of, rather than removing, the existing historic granite pavers into the design.
- All utilities for the proposed Project will be underground.



Spring Street Alignment Alternative



Proposed Project Alignment

The proposed Project's aesthetic impacts were evaluated in Section 3.01, Aesthetics, of the Draft EIR, supported by a comprehensive Visual Impact Assessment included in Appendix C of the Draft EIR. The Aesthetics Section of the Draft EIR and Visual Impact Assessment each specifically addressed and disclosed potential impacts on existing viewsheds and changes in the visual environment from within the LASHP. The Draft EIR concluded that the proposed Project would result in less than significant impacts to aesthetics and visual resources.

TOPICAL RESPONSE G**No Improper Project Segmentation: The Proposed Project is Intended to Create a Transit Connection from Metro’s Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property**

Comments on the Draft EIR suggest that the proposed Project was improperly segmented or “piecemealed” from a larger development project at the Dodger Stadium property. The purpose of the proposed Project is to create a permanent transit connection from the region’s transportation hub at Los Angeles Union Station (“LAUS”) to the Dodger Stadium property via an aerial gondola system. The City of Los Angeles has approved the Dodger Stadium property only for the Major League Baseball stadium and ancillary uses and structures as set forth in the Conditional Use Permit (“CUP”) for the Dodger Stadium property, including transit, and no other purposes. The proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property. No improper segmentation has occurred and the independent utility of the proposed aerial gondola project -- the first permanent transit connection to one of the region’s most visited venues – has been well established.

The Proposed Project Addresses the Need for a Permanent Transit Connection to Dodger Stadium for Dodger Games and Special Events at the Dodger Stadium Property

As described in Section 2.0, Project Description, of the Draft EIR, the proposed Project would connect LAUS, the region’s transportation hub, to the Dodger Stadium property via an aerial gondola system. The construction on the Dodger Stadium property for the proposed Project is limited to project components and related improvements, such as pedestrian circulation facilities, proposed in connection with the aerial gondola system. The proposed Project would provide the first permanent transit link to Dodger Stadium.

As discussed in Section 2.0, Project Description, of the Draft EIR, Dodger Stadium is one of the region’s most visited venues; the average attendance at a Dodger game was approximately 49,000 for the 2019 season. The vast majority of visitors drive their personal vehicles to access the venue. As the third oldest continually used ballpark in Major League Baseball, Dodger Stadium has hosted more than 147 million fans since its opening in 1962. In 2022, over 3.7 million visitors attended Dodger games. Annual attendance has surpassed 3 million visitors in 9 of the last 11 years (excluding 2020 and 2021 where attendance was limited due to the pandemic).⁷¹ Dodger Stadium is the largest MLB stadium in terms of capacity, with approximately 56,000 seats. In addition to MLB games, other special events are hosted at Dodger Stadium throughout the year. As discussed in Section 2.3.7, Purpose and Need, in Section 2.0, Project Description, of the Draft EIR, Dodger Stadium is one of the region’s most visited venues, with approximately 100 baseball games and other events each year. However, there are no permanent transit connections to the venue. Other high-capacity venues in the region are directly accessible by public transit.⁷² As such, the proposed Project addresses the increased need for Dodger Stadium to obtain a

⁷¹ See Dodger Blue, Dodgers Attendance During 2022 Extended MLB Leading Streak (Oct. 7, 2022), <https://dodgerblue.com/dodgers-attendance-during-2022-season-extended-mlb-leading-streak/2022/10/07> (accessed September 20, 2023).

⁷² As discussed in Section 2.3.7, Purpose and Need, in Section 2.0, Project Description, of the Draft EIR, other high-capacity venues in the region include the Crypto.com Arena, which hosts the Los Angeles Lakers and Los Angeles Clippers professional basketball teams and Los Angeles Kings professional hockey team; the Los Angeles Memorial Coliseum, which hosted the Los Angeles Rams professional football team between 2016 and 2019 and hosts the University of Southern California collegiate athletic events; and the BMO Stadium, home to the

permanent transit connection. Given the capacity of the system, approximately 20 percent of fans attending a Dodger game could take aerial transit connected to Metro’s regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. In addition, the proposed Project would provide new connections to and between currently underserved neighborhoods and uses along the proposed alignment, including Chinatown, Mission Junction, the Los Angeles State Historic Park, Elysian Park, and Solano Canyon.

Accordingly, the proposed Project has a clearly defined transportation purpose and independent utility through its ability to address a regional need to provide a permanent transit connection to Dodger Stadium, while also providing new connections to neighborhoods along the proposed alignment to the region’s rapidly growing regional transit system.

Overview of Improper Segmentation of a Project Under CEQA

CEQA requires a public agency to consider “the effects, both individual and collective, of all activities involved in a project.”⁷³ The CEQA Guidelines explain that “project” refers to the “whole of an action, which has the potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect change in the environment.”⁷⁴ The Guidelines further state that “[w]here an individual project is a necessary precedent for action on a larger project, or commits the lead agency to a larger project, with significant environmental effect, an EIR must address itself to the scope of the larger project.”⁷⁵ However, analysis of a larger project is not required without evidence that a larger project exists or that there is an intention to proceed with a larger, more grandiose project in the future.

The proposed Project has independent utility to connect LAUS to Dodger Stadium for games and event days, as well as providing an additional transit option in areas that are currently underserved. Accordingly, the proposed Project serves its own distinct purpose to connect the region’s transportation hub to one of the region’s most visited venues, serving the needs of existing stadium event attendees as well as the surrounding communities. A lead agency is not required to analyze a broader scheme or otherwise attribute a motive to an applicant based on speculation from commenters regarding a potential future action. Evaluation of future environmental effects should wait for the decisions that could cause those effects.

There is no proposal for development of, nor is there any commitment to develop, the property surrounding Dodger Stadium, through plans, or financing. The proposed Project is not a necessary precedent for an action or larger project, and has not committed Metro or any other agency to any future action related to a larger project. The proposed Project is solely comprised of an aerial gondola system connecting LAUS to Dodger Stadium and associated improvements. Accordingly, the Draft EIR did not engage in improper piecemealing in its analysis of the proposed Project.

Los Angeles Football Club (LAFC). These venues are accessible directly by public transit, including the Metro A Line (Blue) and E Line (Expo). Additionally, the new SoFi Stadium in Inglewood, which began hosting the Los Angeles Rams and Los Angeles Chargers professional football teams in 2020, will be accessible via a planned people mover connecting the future Metro Crenshaw/LAX line station to the stadium.

⁷³ California Public Resources Code. 1970. Section 21002.1(d).

⁷⁴ CEQA Guidelines. Section 15378(a).

⁷⁵ CEQA Guidelines. Section 15165.

The Dodger Stadium Property Is Approved Only for Dodger Stadium and Ancillary Uses and Structures, and Restrictive Designations and Zoning Are Not Consistent With the Uses Speculated by Commenters

The proposed Project does not include or request environmental clearance for any actions required to enable development beyond the Stadium Tower and Dodger Stadium Station and other aerial rapid transit system components on the Dodger Stadium property. As discussed in Section 3.11, Land Use and Planning, of the Draft EIR, on August 4, 1960, the City of Los Angeles approved a CUP for the Dodger Stadium property, which allows the operation of the 56,000-seat capacity Major League Baseball stadium and various ancillary uses and structures, as set forth in the CUP for the Dodger Stadium property. In addition, CUP Condition 4 provides for collaboration “in devising mass transportation service to the Stadium site which will be sufficiently efficient to encourage patronage thereof and thus reduce the number of private automobiles driven to the Stadium events.”

The zoning for the Dodger Stadium property is A1-1XL (Agriculture), allowing for agricultural uses with an Extra Limited Height of two stories or 30 feet. The City of Los Angeles Municipal Code (“LAMC”) only allows for single-family dwellings, parks or playgrounds, golf courses, farming, the keeping of livestock, or “any other similar uses or enterprises customarily carried on in the field of general agriculture and not obnoxious or detrimental to the public welfare.”⁷⁶ The Dodger Stadium property is designated as Open Space under the City of Los Angeles General Plan and Silver Lake-Echo Park-Elysian Valley Community Plan.

The Project Sponsor may seek a Plan Approval under the existing CUP to allow for the Stadium Tower and Dodger Stadium Station, including an exception from the site’s 1XL (Extra Limited Height) district designation for the proposed Stadium Tower and Dodger Stadium Station, which would exceed the 1XL district designation limits. In addition, the Project Sponsor is seeking to create a Specific Plan along the proposed Project alignment pursuant to LAMC section 11.5.7 to provide for consistent application of Project design standards, limitations, and operational measures. As noted above, CUP Condition 4 provides for collaboration “in devising mass transportation service to the Stadium site which will be sufficiently efficient to encourage patronage thereof and thus reduce the number of private automobiles driven to the Stadium events.” As such, with approval of the amendments to the zoning code and/or the Plan Approval, development of the Stadium Tower and Dodger Stadium Station would not conflict with the applicable LAMC requirements at the time of proposed Project implementation. The proposed Project does not request any other amendments or exceptions to the Dodger Stadium Property’s zoning.

The purported “future” development that commenters suggest is contemplated at Dodger Stadium, such as office, retail, hotel, and residential buildings, would require additional City designations and zoning, permits and approvals, including potentially, environmental review, that are not contemplated or analyzed in the Draft EIR because no such development is proposed.

⁷⁶ City of Los Angeles. 2010. Los Angeles Municipal Code Section 12.05. Available at: https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1578 (accessed August 2023).

“Next 50” Project From 2008

Comments on the Draft EIR refer to Dodger Stadium-related uses and structures proposed in 2008, over 15 years ago, by former Los Angeles Dodgers owner Frank McCourt, referred to as the “Next 50” Project. The City issued a Notice of Preparation for the Dodger Stadium: The Next 50 Years Project in 2008.⁷⁷ The then-proposed Next 50 Project sought to “provide new fan and cultural amenities, improve the ease of pedestrian circulation around the Stadium, and create a destination for fans to gather at Dodger Stadium.” Proposed improvements included a grand entry to Dodger Stadium, including a plaza and promenade; a Dodger museum, dining, retail, and ticketing enhancements, and Dodger offices; a “Green Necklace,” comprised of an outdoor concourse with landscaping and pedestrian circulation around the Stadium; a landscaped plaza, converted from the existing surface parking area; and parking improvements. The Next 50 Project did not proceed after 2008, and the current owners of the Los Angeles Dodgers purchased the team and Dodger Stadium in 2012. Accordingly, the Next 50 Project is not required to be included as a related project in the Draft EIR or analyzed as part of the proposed Project in Draft EIR.

The current Los Angeles Dodgers owners obtained an approval from the City of Los Angeles in 2019 for the Dodger Stadium Centerfield Project,⁷⁸ which included a new front door to Dodger Stadium – the Centerfield Plaza; new concession and retail areas; new landscaping and pedestrian circulation around the Stadium perimeter; and upgraded circulation throughout the Stadium to improve overall accessibility, security, and ease of movement. The Dodger Stadium Centerfield Project was completed in 2020 prior to the issuance of the Notice of Preparation for the proposed Project. Accordingly, the Dodger Stadium Centerfield Project was not required to be included as a related Project in the Draft EIR or analyzed as part of the proposed Project in the Draft EIR.

As noted above, and as discussed in Section 3.11, Land Use and Planning, of the Draft EIR, the Dodger Stadium property is subject to a CUP, which allows the operation of the 56,000-seat capacity Major League Baseball stadium and various ancillary uses and structures as set forth in the CUP, including the improvements in the Dodger Stadium Centerfield Project. Such ancillary uses and structures are consistent with fan amenities at many Major League Baseball stadiums.

Dodger Stadium CC&Rs From 2012

Comments on the Draft EIR state that the Declaration of Covenants, Conditions, Restrictions and Easement for Chavez Ravine (“CC&Rs”) demonstrate that the proposed Project was “piecemealed” from a larger development project at the Dodger Stadium property. This is not true.

Covenants, Conditions, and Restrictions are legally binding and officially recorded documents frequently used to address the rights and obligations of adjacent property owners. The purpose of the CC&Rs, which were recorded on May 1, 2012, was to address the rights and obligations of the owner of Dodger Stadium and the owner of the parking areas surrounding the Stadium, including most notably as to the Los Angeles Dodgers use of the parking areas as parking for Dodger Stadium attendees. The adoption of the CC&Rs over a decade ago does not constitute a currently proposed development project at the Dodger Stadium property; rather, as is customary, the CC&Rs provide regulations and standards to maintain the existing

⁷⁷ See City of Los Angeles Notice of Preparation for Dodger Stadium: The Next 50 Years, issued on June 16, 2008 (ENV-2008-1659-EIR).

⁷⁸ Dodger Stadium Centerfield Project (City of Los Angeles Council File 19-1096; CPC-1999-0157-PAD-PA5).

stadium uses, including parking, if approvals are sought for additional improvements by the owner of the parking areas. No such development is proposed and no environmental analysis is required of the speculations of commenters. The CC&Rs establish procedures in connection with the rights and obligations of the owner of Dodger Stadium and the owner of the parking areas surrounding the Stadium.

Moreover, similar to the Dodger Stadium CUP provision regarding collaboration for mass transportation service to the Dodger Stadium property, the CC&Rs include a provision for the owner of Dodger Stadium and the owner of the parking areas to cooperate in connection with a proposal for mass transportation to the Dodger Stadium property, which would allow for easier and more efficient public access.

Commenters have also pointed out a provision of the CC&Rs providing that in connection with mass transportation to the Dodger Stadium property, the required number of 16,500 parking spaces established by the Dodger Stadium CUP and the CC&Rs could be reduced. However, the proposed Project is not seeking any reduction of parking spaces below the required number of 16,500 parking spaces. As described in Section 3.11, Land Use and Planning, of the Draft EIR, there are currently a total of 18,889 parking spaces on the Dodger Stadium property, and the proposed Project would remove approximately 194 parking spaces for the Dodger Stadium Station and its pedestrian connection to Dodger Stadium, along with associated hardscape and landscape improvements. Therefore, the proposed Project's transit improvements on the Dodger Stadium property are consistent with both the Dodger Stadium CUP and the CC&Rs.

TOPICAL RESPONSE H**The Draft EIR Considered an Appropriate Range of Alternatives and Design Options**

Comments on the Draft EIR address the range of alternatives studied in the Draft EIR. Commenters state that the Draft EIR failed to consider a reasonable range of alternatives. The Draft EIR considered a range of reasonable alternatives to the proposed Project in compliance with CEQA and the CEQA Guidelines.

Comments on the Draft EIR also address the Transportation Systems Management (“TSM”) Alternative for an enhanced Dodger Stadium Express. Commenters state that the study of the TSM Alternative must be revised and that the TSM Alternative should be pursued instead of the proposed Project. The TSM Alternative is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project’s underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Commenters also suggest that the TSM Alternative should have considered electrification of the TSM Alternative buses, or considered expanding bus service from other locations in order to bolster the TSM Alternative’s potential benefits. Regardless of whether the shuttle buses would be electrified, the operational issues associated with substantially expanding the Dodger Stadium Express service would remain. Further, improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. Moreover, the TSM Alternative is not a permanent transit connection as bus routes and operations are frequently modified and/or eliminated due to fiscal and ridership issues.

Comments on the Draft EIR also suggest that the inclusion of Design and Use Options render the Project Description unstable. To the contrary, the proposed Project is described consistently throughout the entire Draft EIR, clearly identifying the proposed Project’s potential environmental impacts. In turn, Section 6.0, Design and Use Options, of the Draft EIR, includes design and use options responsive to public comments and stakeholder feedback and describes how environmental impacts from implementation of each design and use option would differ from the proposed Project’s potential environmental impacts described in the Project Description and analyzed in Section 3.0, Environmental Analysis, of the Draft EIR, with respect to the particular project component variation. The design and use options provide flexibility for decision makers to potentially adopt one or more minor variations to the components of the proposed Project should the decisionmaker determine such a minor variation is desirable as part of the proposed Project.

The Draft EIR Considered a Range of Reasonable Alternatives

Public Resources Code sections 21001(g), 21002.1(a), and 21061 require that an EIR identify alternatives to a proposed project. CEQA Guidelines section 15126.6(a) expands on the statute by stating that an EIR must include a “reasonable range” of alternatives to the project “which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project.” Likewise, CEQA Guidelines section 15126.6(f)(2)(A) further clarifies that an EIR is not required

to analyze alternatives that would not eliminate or substantially reduce significant adverse effects. An agency's selection and consideration of alternatives is governed by a "rule of reason."⁷⁹ An agency need not consider "every conceivable alternative" and may determine how many is a reasonable range.⁸⁰

Alternatives Analyzed in the Draft EIR

The alternatives analyzed in the Draft EIR, which are the No Project Alternative, the Spring Street Alignment Alternative, and the Transportation Systems Management ("TSM") Alternative, represent a reasonable range of potentially feasible alternatives that could reduce one or more significant impacts of the proposed Project. As presented in the Draft EIR, two project alternatives, as well as a "No Project" alternative, were described and compared with each other (including a comparison of major characteristics and significant environmental effects of each alternative) and with the proposed Project. Table 4-1, Alternatives Conformance with Objectives, and Table 4-3, Alternative Impact Comparison, in Section 4.0, Alternatives, of the Draft EIR, provide a comparison of the proposed Project, the proposed Project alternatives' impacts, and the proposed Project alternatives' ability to meet the Project Objectives.

The Draft EIR considers a reasonable range of alternatives that can feasibly accomplish most of the basic Project Objectives and could avoid or substantially lessen one or more of the significant effects. Alternatives that would impede, to some degree, the attainment of the Project Objectives, or would be more costly, also were considered. As required by CEQA, the alternatives analysis in Section 4.0, Alternatives, of the Draft EIR, included evaluation of the No Project Alternative in order to determine the consequences of not implementing the proposed Project.⁸¹ CEQA also requires that an EIR identify the "environmentally superior alternative" from the range of reasonable alternatives that are evaluated; if the "environmentally superior alternative" is the "No Project" alternative, the EIR must identify an "environmentally superior alternative" among the other alternatives. The Draft EIR adequately identifies and analyzes a reasonable range of alternatives in full compliance with CEQA's requirements.

As discussed in Section 4.2, Alternatives Development Process, of Section 4.0, Alternatives, of the Draft EIR, pursuant to CEQA Guidelines section 15126.6(d), discussion of each alternative presented in the Draft EIR was intended to "'allow meaningful evaluation, analysis, and comparison with the proposed project,'" and each alternative was "evaluated in sufficient detail to determine the overall environmental impacts would be less than, similar to, or greater than the corresponding impacts of the proposed Project" and was "evaluated to determine whether the proposed Project objectives . . . would be mostly attained by the alternative pursuant to CEQA Guidelines Section 15126.6(c)." Evaluation of each of the alternatives included a description of the alternative, the environmental impacts of the alternative before and after implementation of reasonable mitigation measures for each environmental topic area, and the environmental impacts of each alternative as compared to the proposed Project, followed by a general discussion of the extent to which the underlying purpose and project objectives are obtained by the alternative.

⁷⁹ CEQA Guidelines, Section 15126.6(a); see also id., Section 13053.5(a).

⁸⁰ Id., Section 15126.6(a).

⁸¹ See CEQA Guidelines Section 15126.6(e).

Alternatives Considered but Dismissed from Detailed Analysis

In compliance with CEQA Guidelines section 15126.6(c), Section 4.2.1, Alternatives Considered but Dismissed from Detailed Analysis, in Section 4.0, Alternatives, of the Draft EIR, identifies alternatives that the Lead Agency considered but dismissed as infeasible during the scoping process, providing the reasons underlying this determination. Among the factors that may be used to eliminate alternatives from detailed consideration in the EIR are:

- i. Failure to meet most of the basic project objectives,
- ii. Infeasibility, or
- iii. Inability to avoid significant environmental impacts.⁸²

Section 15126.6(f)(1) of the CEQA Guidelines states that “among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).” None of these factors establish a fixed limit on the scope of reasonable alternatives or a particular number that the Draft EIR was required to analyze.

Section 4.2.1, Alternatives Considered but Dismissed from Detailed Analysis, in Section 4.0, Alternatives, of the Draft EIR, considered five potential alternatives, including alignment and station location alternatives and direct alignment alternatives. In accordance with CEQA Guidelines section 15126.6(f)(2), the Draft EIR declined to carry forward an analysis of the alternative locations studied in the direct alignment alternatives, as such alternatives failed to avoid significant environmental impacts and otherwise would not meet the Project Objectives, and the Project Sponsor would likely be unable to reasonably acquire, control, or otherwise have access to alternative sites required for the direct alignment alternatives. Among the failure to meet other Project Objectives, the direct alignment alternatives would not maximize the use of public ROW and publicly owned properties while minimizing use of aerial rights over private properties. As discussed on pages 4-10 to 4-15 of Section 4.0, Alternatives, of the Draft EIR, the two alignment and station location alternatives were not carried forward for a more detailed analysis because they failed to avoid significant environmental impacts and otherwise would not meet the Project Objectives.

No Project Alternative

Pursuant to CEQA Guidelines section 15126.6(e), pages 4-18 to 4-25 in Section 4.0, Alternatives, of the Draft EIR, provide an analysis of a “No Project Alternative,” in order to provide a comparison between the environmental impacts of implementing the proposed Project in contrast to those resulting from not approving, or denying, the proposed Project. The No Project Alternative would avoid potentially significant impacts to all environmental considerations and would have no impact, as the proposed Project would not occur, and the environment would remain in its existing condition. However, environmental benefits through the proposed Project’s ability to reduce vehicle miles, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel, and to

⁸² CEQA Guidelines, Section 15126.6(c).

implement LID source control and BMPs to minimize water runoff and water pollution would not be realized. The No Project Alternative would be unable to meet any of the Project Objectives, as summarized in Table 4-1, Project Objective Conformance, in Section 4.0, Alternatives, of the Draft EIR.

Spring Street Alignment Alternative

Similar to the proposed Project, the Spring Street Alignment Alternative would provide an aerial rapid transit option for visitors to Dodger Stadium, while also providing access between Dodger Stadium, the surrounding communities, and the regional transit system accessible at LAUS. The Spring Street Alignment Alternative would include three stations, a non-passenger junction, and four cable-supporting towers at various locations along the alignment. The Spring Street Alignment Alternative would include the following components in common with the proposed Project: Alameda Station, Alameda Tower, Alpine Tower, Stadium Tower, and Dodger Stadium Station. In addition to these components, the Spring Street Alignment Alternative would also include the following components that would be unique to this alternative: Spring Street Junction, State Historic Park Station, and Bishops Tower. A detailed description and impacts analyses of the Spring Street Alignment Alternative's proposed alignment are provided in Section 4.2.2.2, Spring Street Alignment Alternative, of Section 4.0, Alternatives, of the Draft EIR.

Although the Spring Street Alignment Alternative would be consistent with the Project Objectives, it would require a larger footprint than the proposed Project within the Los Angeles State Historic Park. The proposed Project's Chinatown/State Park Station location was chosen over the other potential locations, including State Historic Park Station location as part of the Spring Street Alignment Alternative, because it would minimize the proposed Project's potential footprint within the Los Angeles State Historic Park while maintaining transit access to the park and surrounding communities and is closer to the Metro L Line (Gold) Station. As such, the Spring Street Alignment Alternative would not meet the following objective to the same extent as the proposed Project, and therefore, is considered to be only partially consistent with Objective 11 to "Minimize the Project's environmental footprint through the integration of sustainability and environmentally-friendly design features into the materials, construction, operations, and maintenance of the proposed Project."

As discussed in Section 4.0, Alternatives, of the Draft EIR, the Spring Street Alignment Alternative could result in additional sources of light and glare and shading due to the additional proposed Project components, although impacts would be less than significant. In addition, although the State Historic Park Station would be at a location not previously analyzed, this station would have similar levels of construction as the proposed Project. Potential environmental impacts of the Spring Street Alignment Alternative would generally be similar to the proposed Project, as shown in Table 4-3, Alternative Impact Comparison, in Section 4.0, Alternatives, of the Draft EIR.

Dodger Stadium Express | TSM Alternative

Under the Transportation Systems Management (TSM) Alternative, the proposed Project would not be constructed, and, instead, the existing Union Station Dodger Stadium Express service would be enhanced to increase capacity.

In order to meet service frequencies similar to the proposed Project, a minimum of 6 buses loading simultaneously would be required, which cannot be physically accommodated in the existing location for

the Union Station DSE, and an off-site loading facility would need to be constructed to accommodate the new level of bus activity. Furthermore, the existing Dodger Stadium Express service operates up to 8 buses per hour, while the TSM Alternative would require 77 buses per hour.

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

The TSM Alternative was identified as the “environmentally superior alternative” among the alternatives evaluated in the Draft EIR because it would avoid the proposed Project’s significant and unavoidable impact with respect to construction noise and vibration without the need for mitigation, and would reduce the range of impacts to the greatest extent listed in Table 4-3, Alternative Impact Comparison, in Section 4.0, Alternatives, of the Draft EIR. However, as discussed in Section 4.1.3, Project Alternatives and Conformance with Objectives, in Section 4.0, Alternatives, of the Draft EIR, the TSM Alternative would not meet the majority of the Project’s Objectives in full or in part, such as providing a direct transit connection between LAUS and the Dodger Stadium property via an aerial rapid transit system and improving connectivity for the surrounding communities by linking to the Los Angeles State Historic Park, Elysian Park, and the region’s rapidly growing regional transit system at LAUS.

Specifically, the TSM Alternative would fail to fulfill the following Project Objectives because it is not an aerial rapid transit system and otherwise does not offer a unique experience to riders, and would not enhance community connectivity or park access:

- **Objective 2:** Attract new transit riders to the Metro system through a unique experience connecting to Dodger Stadium.
- **Objective 7:** Improve transit rider experience by providing unique scenic views of the Los Angeles area to ART passengers and Dodger fans.
- **Objective 8:** Bring a world class aerial transit system to the Los Angeles area.
- **Objective 9:** Enhance community connectivity by providing first/last mile transit and pedestrian access to areas that have historically been underserved, including the Los Angeles State Historic Park and Elysian Park.
- **Objective 10:** Identify comparable, affordable, and accessible fare opportunities for community and Los Angeles State Historic Park and Elysian Park access.
- **Objective 12:** Provide a sustainable form of transit by operating the ART system with the use of zero emission electricity with battery storage backup in order to reduce GHG emissions and improve air quality.

In addition, as discussed in Section 4.1.3, Project Alternatives and Conformance with Objectives, in Section 4.0, Alternatives, of the Draft EIR, the TSM Alternative would not meet the following Project Objectives to the same extent as the proposed Project, as while it would provide a connection to Dodger Stadium, it would not provide a faster or more efficient alternative compared to the proposed Project,

and while it would transition private vehicles to DSE buses, the TSM Alternative would still operate vehicles on the roadway, thereby contributing to VMT and some congestion:

- **Objective 1:** Expand mobility options for transit riders through a direct connection between LAUS and Dodger Stadium, a regional event center.
- **Objective 3:** Improve the Dodger Stadium visitor experience by providing efficient, high-capacity, and faster alternative access to Dodger Stadium.
- **Objective 4:** Enhance safety of neighborhoods adjacent to Dodger Stadium by reducing the number of vehicles in the area.
- **Objective 5:** Reduce transportation related pollution and greenhouse gas (GHG) emissions as a result of reduced vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.
- **Objective 6:** Increase connectivity of people to the region's public transportation hub at LAUS and the Dodger Stadium property.

The Draft EIR Provided Sufficient Analysis to Show that Expansion/Enhancement of the Existing Dodger Stadium Express Would Not Provide Similar Benefits Without Negative Impacts

Comments state that expansion and/or enhancement of the existing Dodger Stadium Express bus service would provide similar benefits of the proposed Project but without potential negative impacts. Comments further state that the Draft EIR should have analyzed the TSM Alternative as the proposed Project.

The Draft EIR included a detailed discussion of the transportation implications of the TSM Alternative on pages 4-60 through 4-63 and on pages 4-70 through 4-73, in Section 4.0, Alternatives, of the Draft EIR in order to allow meaningful evaluation, analysis, and comparison with the proposed Project. This analysis was supported by discussion with Metro's expert tasked with managing the Dodger Stadium Express. Further, this expert is intimately familiar with contract services bus operations, including the Dodger Stadium Express and the SoFi Stadium shuttles.⁸³ As described on page 4-60, in Section 4.0, Alternatives, of the Draft EIR, 77 bus trips per hour would be needed to provide the equivalent passenger-carrying capacity of the proposed Project, a significant increase from the eight bus trips per hour that the Dodger Stadium Express currently uses. A number of issues are identified and evaluated in the Draft EIR regarding the difficulty and/or negative impacts of providing a substantial increase in Dodger Stadium Express service levels, whether as a result of the 77 bus trips per hour (equivalent to capacity of the proposed Project) or even to a lesser level of service:

- As discussed on page 4-60, of Section 4.0, Alternatives, of the Draft EIR, even at the current level of LAUS DSE operation, Metro has already moved the loading zone for the existing DSE numerous times in response to operational challenges encountered over many years of operating the Dodger Stadium Express. Metro staff have studied ways to facilitate multiple buses loading simultaneously and have found that there is insufficient curb loading capacity currently at LAUS.

⁸³ As noted on pages 4-60 and 4-62 in Section 4.0, Alternatives of the Draft EIR, the analysis was informed by personal communication with Mr. George Del Valle, Principal Transportation Planner, Metro Contract Services, on May 31, 2022.

- Loading and unloading 77 buses in a timely and efficient manner would require a substantially larger loading zone. As discussed on pages 4-60 and 4-61 and shown on Figure 4-13 on page 4-62, of Section 4.0, Alternatives, of the Draft EIR, the approximate footprint of a dedicated loading zone would need to be approximately as large as the shuttle bus loading facility at SoFi Stadium in the City of Inglewood. The Draft EIR identified the top deck of the Metro Division 13 bus maintenance facility as a potential site given its similar size.
- As discussed on page 4-61 of Section 4.0, Alternatives, of the Draft EIR, use of Division 13 would cause considerable disruption to existing Metro transit operations, which use the facility not only for Division 13 maintenance but also for bus layovers supporting bus services in Patsaouras Plaza.
- As discussed on pages 4-61 and 4-72 of Section 4.0, Alternatives, of the Draft EIR, use of Division 13 would extend the transfer walking time for passengers and would cause a substantial increase in vehicle/pedestrian conflicts since the riders of the enhanced Dodger Stadium Express (upwards of 5,000 additional pedestrians per hour) would need to cross two legs of the Cesar E. Chavez Avenue/Vignes Street intersection to transfer between the transit services at LAUS and the maintenance facility. Traffic Control Officers would be needed as mitigation for the potential increase in hazards, and increased traffic congestion and queue spillback would affect on-time performance for existing bus transit services at Patsaouras Plaza and on Cesar E. Chavez Avenue.
- Physical modifications would need to be made to the Metro Division 13 maintenance facility to accommodate the high volume of pedestrians arriving and departing.
- As stated on pages 4-62 and 4-72, of Section 4.0, Alternatives of the Draft EIR, dedicated bus lanes would be implemented on Vin Scully Avenue between Sunset Boulevard and the entrance to Dodger Stadium as part of the TSM Alternative. The existing bus-only lanes on Sunset Boulevard and Cesar E. Chavez Avenue are only in operation between 7 a.m. and 9 a.m. in the eastbound direction and between 4 p.m. and 7 p.m. in the westbound direction, Mondays through Fridays. The hours of operation of these bus-only lanes could potentially be provided to be westbound on Sunset Boulevard and Cesar E. Chavez Avenue before every game (not just weekday evening games) and eastbound on Sunset Boulevard and Cesar E. Chavez Avenue after every game. This would expedite DSE service (both for the existing DSE service and the TSM Alternative), but could also increase traffic congestion and would displace existing curb parking that is currently used by the community.

A number of comments also suggest that an expanded fleet of buses for expanded Dodger Stadium Express service would be available for other uses or local service when not needed for Dodger Stadium events. Such a system would require a substantial increase in the number of buses which, similar to expanding the fleet for an expanded DSE service, would result in a fleet of buses that would be underutilized most of the time, or regular Metro bus service that utilizes these vehicles would be disrupted every time a Dodger game or event at the stadium is held.

As discussed on page 4-63 and on page 4-71, in Section 4.0, Alternatives, of the Draft EIR, the Draft EIR concluded that, even with a substantially increased Dodger Stadium Express bus capacity, the Dodger Stadium Express's slower travel time to/from Dodger Stadium as compared to the proposed Project and the additional transfer time for riders to walk between Union Station and the maintenance facility would

render the Alternative substantially less competitive with driving time than the proposed Project, thus reducing its ridership potential compared to the proposed Project. As such, reductions in driving to Dodger Stadium and associated reductions in VMT would be less than for the proposed Project.

Electrification of Dodger Stadium Express Shuttle Buses

Comments state that the TSM Alternative in the Draft EIR did not consider electrification of shuttle buses. These comments suggest that Metro is considering transitioning its bus fleet to zero-emission buses and, therefore, would provide the same net benefits as the proposed Project. The Metro Board received and filed a board report on April 20, 2023, regarding a staff recommendation to extend the deadline for transitioning the entire bus fleet to zero-emission buses from 2030 to 2035.⁸⁴ While Metro has made significant progress in transitioning to a zero-emission bus service, the report recognizes that “the ZEB industry is still evolving and not sufficiently mature to allow for full implementation by 2030 without risk to service. Key issues include cost, grid capacity, performance (reliability, maintainability, and operability), early obsolescence, utility lead times, and supply chain issues.” Further, unlike the proposed Project, which, as discussed in Section 3.08, Greenhouse Gas Emissions, of the Draft EIR, has pledged to purchase power required for operation of the proposed Project from the City of Los Angeles Department of Water and Power (“LADWP”) through the utility’s Green Power Program, pursuant to GHG-PDF-A, Metro has not proposed obtaining the electricity for its electric buses from green sources. The Metro report discusses the potential issues with the electrical grid’s ability to provide the electricity that Metro would require for a full zero-emission bus fleet.

Regardless of whether the shuttle buses would be electrified, the operational issues associated with substantially expanding Dodger Stadium Express service discussed on pages 4-60 through 4-63 and on pages 4-70 through 4-73, in Section 4.0, Alternatives, of the Draft EIR, and in this topical response above, would remain.

Bus-Only Lanes on Vin Scully Avenue

A number of comments suggested that bus-only lanes should be provided on Vin Scully Avenue. As stated on pages 4-62 and 4-72, in Section 4.0, Alternatives of the Draft EIR, dedicated bus lanes would be implemented on Vin Scully Avenue between Sunset Boulevard and the entrance to Dodger Stadium and also within the Dodger Stadium property as part of the TSM Alternative. While this would improve Dodger Stadium Express service, this would also increase traffic congestion on Vin Scully Avenue and within the Dodger Stadium property.

Alternatives Providing Bus Service From Other Locations Would Not Materially Improve Transit Time Compared to Driving and Would Incur Substantial Costs

Comments suggest that a bus-only alternative should analyze buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events. Such a system would require a substantial increase in the number of buses which, similar to expanding the fleet for an expanded Dodger Stadium Express service, would result in a fleet of buses that would either be underutilized most of the time, or regular Metro bus service that utilizes these vehicles would be disrupted every time a Dodger game or event at the stadium is held. Such a service would also incur substantial costs in paid time and

⁸⁴ <https://datamade-metro-pdf-merger.s3.amazonaws.com/2023-0207.pdf>.

mileage for driving empty buses out to the remote locations before a game and back from the remote locations after a game and paid idle time during the game. Buses from a variety of remote locations would also need to travel in rush hour congestion to get to Dodger Stadium. With limited regional facilities that provide bus only lanes that these services could utilize, they would not materially improve transit travel time compared with driving.

The current Dodger Stadium Express service from the South Bay is an existing example of the type of service these comments suggest, although it is one line instead of many. Riders can board the South Bay DSE at any one of five different stations along the Harbor Transitway: Harbor Gateway Transit Center, Rosecrans Station, Harbor Freeway Station, Manchester Station, and Slauson Station. Thus, despite serving a broad area of southern Los Angeles County at stations spread across eight miles, that the service is free, and that the service travels on a priority lane within the I-110 freeway median for most of its trip, the South Bay DSE carried an average of only 415 passengers per game in 2019, which is substantially lower than the ridership of 1,895 riders per game on the LAUS Dodger Stadium Express. Based on existing ridership patterns of the Dodger Stadium Express, including the mode of access survey data collected by Metro included in Appendix N, Transportation Appendices, of the Draft EIR, the majority of Dodger Stadium Express riders take rail transit to connect with the Dodger Stadium Express, which is the key differentiator as to why the LAUS Dodger Stadium Express has higher ridership than the South Bay Dodger Stadium Express. Improving the connections between Dodger Stadium and LAUS via the proposed Project would provide the quickest, most frequent, and highest capacity transit connections for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Pedestrian Enhancement Alternative

Comments on the Draft EIR suggest that a pedestrian enhancement alternative to the proposed Project, studying the potential to improve the pedestrian experience from Chinatown to Dodger Stadium by including bike lanes, improved and widened sidewalks, and escalators and/or stairs, should have been included in the Draft EIR. Refer to Section 5.0, Corrections and Additions, of this Final EIR, for a discussion of the Pedestrian Enhancement Alternative, which was considered but dismissed from further consideration for failure to meet most of the basic Project Objectives to the same degree as the proposed Project. For instance, the Pedestrian Enhancement Alternative would not meet the Project Objectives to expand mobility options for transit riders, attract new riders to the Metro system, enhance community connectivity by providing first/last mile transit and pedestrian access to areas that have historically been underserved, including the Los Angeles State Historic Park and Elysian Park, increase connectivity to the region's public transportation hub at LAUS and the Dodger Stadium property, or to improve the Dodger Stadium visitor experience by providing efficient, high-capacity and faster alternative access to Dodger Stadium, to the same extent as the proposed Project.

The Project Objectives Do Not Artificially Narrow the Range of Alternatives Considered

Comments on the Draft EIR suggest that the Project Objectives are artificially narrow in order to preempt adoption of the TSM Alternative as the preferred alternative. The Project Objectives were defined in order to assist Metro in considering alternatives that achieve the proposed Project's fundamental purpose of providing a permanent transit connection to Dodger Stadium.

An EIR's project description must contain a statement of the project objectives, which are used by the lead agency to help it develop a reasonable range of alternatives to the proposed project to evaluate in the EIR.⁸⁵ An EIR need not present alternatives that are incompatible with the project's fundamental purpose, so a lead agency may structure the EIR alternatives analysis based on a reasonable definition of the project's underlying purpose and need not study alternatives that cannot achieve that fundamental goal. As discussed in Section 2.3.7, Purpose and Need, in Section 2.0, Project Description, of the Draft EIR, Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. The proposed Project is needed to alleviate existing congestion and associated air pollution while providing safe, zero emission, environmentally friendly, and high-capacity transit connectivity in the Project area that would reduce GHG emissions as a result of reduced vehicular congestion in and around Dodger Stadium and on neighborhood streets, arterial roadways, and freeways. The overall purpose of the proposed Project is to provide a direct transit connection between LAUS and the Dodger Stadium property via an aerial gondola system and improve connectivity for the surrounding communities by linking to the Los Angeles State Historic Park, Elysian Park, and the neighborhoods along the proposed Project alignment and the region's rapidly growing regional transit system at LAUS. Aerial rapid transit technology is a proven, zero emission, safe, sustainable, high-capacity, and highly efficient form of transportation that would function as both a reliable rapid transit system and first/last mile connector. The proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. Alternatives that would not provide a permanent transit connection to Dodger Stadium would not achieve the proposed Project's underlying purpose to provide such a transit connection.

In defining a project's objectives, the lead agency may not adopt artificially narrow project objectives that would preclude consideration of reasonable alternatives for achieving the project's underlying purpose. The Project Objectives are designed to achieve the proposed Project's underlying purpose of providing a direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities. These objectives are not so narrow that they preclude consideration of reasonable alternatives – while alternatives for a project must be able to satisfy “most of the basic objectives of a project,” alternatives should not be excluded simply because they would impede attainment of project objectives “to some degree.”⁸⁶ The Project Objectives broadly contemplate improving neighborhood connectivity and the Dodger Stadium visitor experience, reducing vehicle congestion and associated emissions in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, improving access to Elysian Park and the Los Angeles State Historic Park, and providing a sustainable form of transit. A reasonable range of alternatives were considered as the Project Objectives are not so narrow that they preclude consideration of alternatives to the proposed Project, including the TSM Alternative. CEQA does not require that the alternatives considered meet each and every objective, and in fact, some of the alternatives considered did not. In addition, CEQA does not require that the objectives for the proposed Project be so broad to require consideration of alternatives that do not meet the project's underlying purpose.

⁸⁵ CEQA Guidelines Section 15124(b).

⁸⁶ CEQA Guidelines, Section 15126.6(a)–(b).

The Use of Design Options Does Not Render the Project Description Unstable

As discussed in Section 6.0, Design and Use Options, of the Draft EIR, five design and use options were considered to explore potential variations to various Project components in response to public comments and stakeholder feedback. Each design and use option offers a variation to the proposed Project. The design and use options are not “alternatives” within the meaning of CEQA as they address specific elements of the proposed Project and are not alternatives to the proposed Project as a whole. The design and use options are responsive to public comments and stakeholder feedback and provide flexibility for the lead agency’s decision makers to potentially adopt one or more minor variations to the components of the proposed Project should the decisionmaker determine such a minor variation is desirable as part of the proposed Project.

Section 3.0, Environmental Analysis, of the Draft EIR analyzes the proposed Project without any design and use options. Section 6.0, Design and Use Options, of the Draft EIR describes each design or use option and analyzes the environmental impacts of the proposed Project with each design or use option, performing the impact analysis relative to the respective Project component of the proposed Project.

Comments state that the inclusion of the design and use options in the Draft EIR renders the Project Description unstable. The proposed Project is described consistently throughout the entire Draft EIR, clearly identifying the proposed Project’s potential environmental impacts. In turn, Section 6.0, Design and Use Options, of the Draft EIR describes how environmental impacts from implementation of each design and use option would differ from the proposed Project’s potential environmental impacts described in the Project Description and analyzed in Section 3.0, Environmental Analysis, of the Draft EIR. By analyzing the design and use options in a separate section of the Draft EIR, the lead agency retains the flexibility to respond to stakeholder concerns related to individual components of the project while maintaining a stable project description that identifies the project’s main features and other information sufficient to foster a complete and informative evaluation of the project’s environmental impacts.⁸⁷ The design and use options studied in Section 6.0, Design and Use Options, of the Draft EIR, each present a minor variation to a component of the proposed Project, do not require different project design features or result in new or different impacts requiring different mitigation measures, and otherwise meet the same Project Objectives. The Draft EIR’s Project Description provides the required “main features” of the proposed Project, with the Design and Use Options providing minor variants to the proposed Project.

⁸⁷ CEQA Guidelines § 15124. Specifically, CEQA Guidelines Section 15124 requires a project description to include a description of the project’s location, a statement of the project’s objectives, a description of the project’s technical and environmental characteristics, a discussion of the intended uses of the EIR, and a list of the project approvals that will be required.

TOPICAL RESPONSE I**Use of Project Design Features and Plans in Mitigation Measures**

Comments on the Draft EIR state that the incorporation of plans or future studies in mitigation measures results in impermissible deferral. The use of plans and future studies are commonplace measures used to tailor mitigation measures to reflect the environmental conditions at the time the potential impact would occur. Moreover, the mitigation measures requiring plans or future studies are incorporated within the proposed Project's Mitigation Monitoring and Reporting Program as mandatory elements of the proposed Project, along with other enforcement and timing mechanisms, and include specified performance standards and steps for the implementing agency to follow to achieve compliance with the specified performance standard.

Comments on the Draft EIR contend that the use of Project Design Features impermissibly obscures the Project's environmental effects. Commenters specifically point to project design features intended to provide additional environmental benefits in the Cultural Resources and Wildfire context, where the environmental impact was already determined to be less than significant. The Draft EIR disclosed the environmental impact determination prior to the implementation of the Project Design Features. The Project Design Features provide additional environmental benefits for the respective impact area and do not obscure the proposed Project's environmental effects.

The Development of Plans in Mitigation Measures Is Not Impermissible Deferral

The proposed Project's Mitigation Measures would not result in improper deferral of mitigation. CEQA Guidelines section 15126.4(a)(1)(B) confirms that mitigation measures may defer formulation of specific details regarding how to mitigate a significant impact when it is impractical or infeasible to specify the specific details of mitigation during the EIR review process, provided that the lead agency commits to implement the mitigation, adopts a specified performance standard, and identifies the types of actions that may achieve compliance with the performance standard. Future studies may be used to tailor mitigation measures to fit on-the-ground environmental conditions. The proposed Project's Mitigation Measures satisfy each of these requirements.

The Use of Future Studies or Plans in Mitigation Measures Is Appropriate Where Needed to Reflect Existing Environmental Conditions at the Time of Construction or Where Such Studies Are Impracticable at This Juncture

The proposed Project's Mitigation Measures appropriately require the development of plans or further study where the plans would reflect the current environmental conditions at the time of construction or it is impracticable to conduct the studies prior to the EIR's certification. For example, Mitigation Measure TRA-B, requiring the preparation of a construction traffic management plan that would "ensure construction activities of the concurrent related projects and associated hauling activities are managed in collaboration with one another and the proposed Project" because it is currently unknown what other construction for related projects may be occurring at the same time as the proposed Project. It is not feasible to finalize the plan at the Draft EIR stage, and the plan would be drafted based on the advanced design work and study completed for the proposed Project and the current environmental conditions at the time construction for the proposed Project would begin. Mitigation Measure TRA-B provides a precise

accounting of what the construction traffic management plan would include, as well as specific performance standards that the plan is designed to achieve, as discussed in further detail below.

Mitigation Measure TRA-C similarly is intended to reflect on-the-ground environmental conditions at the time of the proposed Project construction. Mitigation Measure TRA-C requires the preparation of a Temporary Disaster Route Plan “[p]rior to the issuance of a building permit for the proposed Project, in coordination with and subject to the approval of LADOT.”⁸⁸ This plan would be drafted based on the advanced design work and study completed for the proposed Project and the current environmental conditions at the time construction for the proposed Project would begin.

With respect to Mitigation Measures CUL-A and CUL-C through CUL-E, as acknowledged on page 3.5-2, Section 3.05, Cultural Resources, of the Draft EIR, “an archaeological resource may not be recognizable or even observable without ground-disturbing activities.” Mitigation Measures CUL-A and CUL-C through CUL-E accordingly outline actions that would be taken in the unlikely event that archaeological resources are discovered once excavation begins on-site. Excavation or other such ground disturbance prior to approval of the proposed Project to discover any potential additional resources is impracticable at this juncture.

For the same reasons, Mitigation Measure GEO-B, discussed on page 3.7-21, of Section 3.07, Geology and Soils, of the Draft EIR requires the preparation of a Paleontological Resources Monitoring and Mitigation Plan, allowing a qualified paleontologist to tailor monitoring to the on-the-ground conditions, such as the “rate of ground-disturbing activities, the material being excavated, and the depth of excavation; and if found, the abundance and type of paleontological materials” as discovered “during construction excavations into older Quaternary alluvial deposits and Miocene Puente formation deposits.” None of these actions may be taken in advance of proposed Project approval, as excavation or other such ground disturbance to discover any potential additional resources is impracticable at this juncture. As noted on page 3.7-12, of Section 3.07, Geology and Soils, of the Draft EIR, “fossils have been encountered at depths ranging from 35 to 100 feet at locations southeast and northeast of the Project site.” Accordingly, in order to potentially determine whether construction of the proposed Project would encounter paleontological resources, excavation of at least 35 feet and up to 100 feet would be required. Excavation to this depth prior to the potential approval of the proposed Project is impracticable, and would require significant disruptions in order to close portions of streets and right-of-way where the proposed Project’s foundations and columns would be located to test the areas where excavation and ground disturbing activities would occur. For reference, as noted on page 3.7-19, of Section 3.07, Geology and Soils, of the Draft EIR, “[c]onstruction work is anticipated to reach up to 125 feet in depth for installation of the piles and an excavation depth of up to 10 feet, except for at the proposed Dodger Stadium Station, which has an excavation depth of 42 feet.” Therefore, monitoring described in Mitigation Measure GEO-B is appropriately reserved as part of the construction in order to avoid the need to excavate more than once in connection with the proposed Project.

Likewise, Mitigation Measure HAZ-A would not impermissibly defer mitigation. As discussed in Section 3.09, Hazards and Hazardous Materials, Appendix K, Phase I Environmental Site Assessment, and Appendix L, Hydrology Technical Report, of the Draft EIR, the Draft EIR conducted an extensive preliminary

⁸⁸ Draft EIR, Section 3.17, Transportation, p. 3.17-69.

investigation of the proposed Project's sites to determine whether the site exhibited contamination from hazardous materials or would otherwise have impacts to groundwater. Based on this investigation, the Draft EIR concluded that additional investigation may be appropriate, although a full investigation is impracticable at this time because the Project Sponsor does not have access agreements for all the underlying properties and would have to obtain these agreements prior to testing. Moreover, it is appropriate for the Project Sponsor to test soils for contamination at the time the soil is disturbed and properly handle and remove any contaminated soil or groundwater at this time for off-site disposal and/or recycling, as outlined in Mitigation Measure HAZ-A. Nevertheless, in response to comments on the Draft EIR requesting additional clarification on the enforcement mechanisms and standards in Mitigation Measure HAZ-A, an addition to the Draft EIR has been provided to clarify that the Soil and Groundwater Management Plan shall be submitted to the LADB for review prior to the commencement of demolition and construction activities and as a condition of the grading, construction, and/or demolition permit(s). The addition also recognizes that Mitigation Measure HAZ-A requires full compliance with all applicable local, state, and federal regulations (including but not limited to, as applicable, OSHA Safety and Health Standards, Cal/OSHA requirements, federal, state and local waste disposal regulations, SCAQMD Rule 1166, as well as any other applicable requirements of the California Department of Toxic Substances, the Los Angeles Regional Water Quality Control Board, and the City of Los Angeles) related to the identification, excavation, transportation, and disposal of hazardous materials, including those encountered in excavated soil and dewatered groundwater.

Mitigation Measure GEO-A requires the preparation of a Site-Specific Final Geotechnical Report. As discussed on page ES-50 of the Executive Summary, and page 3.7-20, of Section 3.07, Geology and Soils, of the Draft EIR, Mitigation Measure GEO-A requires the Project Sponsor to "engage a California-registered geotechnical engineer to prepare and submit a site-specific final geotechnical investigation and report to the City of Los Angeles for review, consistent with the requirements of the CBC, applicable Los Angeles amendments, and the California Geotechnical Survey Special Publication 117 (as amended)." The "submittal and approval of the final geotechnical report shall be a condition of the grading and construction permits issued by the City of Los Angeles Department of Building and Safety." Further, the "site-specific final geotechnical report shall provide a description of the geological and geotechnical conditions at the site; the findings conclusions, and mitigation recommendations for potential geologic and seismic hazards; and design-level geotechnical recommendations in support of grading and foundation design." The details of the mitigation measures are appropriately left to the time when later design work has been completed, coupled with review from qualified engineers, in compliance with pertinent codes.

Metro Has Committed to Implementing the Proposed Project's Mitigation Measures

All of the proposed Project's Mitigation Measures (and Project Design Features) are incorporated in the proposed Project's Mitigation Monitoring and Reporting Program, provided in Section 7.0, Mitigation Monitoring and Reporting Program, of this Final EIR, as mandatory elements of the proposed Project. Accordingly, Metro has committed to implementing the proposed Project's Mitigation Measures.

The Mitigation Measures also provide enforcement mechanisms for Metro or the appropriate responsible agency. (See e.g., Mitigation Measure TRA-B, Draft EIR, § 3.17, Transportation, p. 3.17-67 [requiring Construction Traffic Management Plan to be approved by the City of Los Angeles prior to the issuance of

a building permit for the proposed Project]; see also Mitigation Measure NOI-A, Draft EIR, § 3.13, Noise, p. 3.13-68 [requiring the Project Sponsor to “design a Construction Noise Management Plan to minimize the construction-related noise impacts to off-site noise-sensitive receptors” “prior to the issuance of grading permits for the proposed Project.”].)

The Mitigation Measures Outline Specific Performance Standards and Actions to Meet the Provided Performance Standard

The proposed Project’s Mitigation Measures adopt specific performance standards and outline specific actions to be implemented for Metro or the appropriate responsible agency to determine that the proposed Project has met the specified performance standard. For example, Mitigation Measure TRA-B provides that the Construction Traffic Management Plan would maintain “visibility to open pedestrian crossings” and “ensure that access will remain accessible for land uses in proximity to the Project alignment and component sites during construction.” Mitigation Measure NOI-A, discussed on page 3.13-68, of Section 3.13, Noise, of the Draft EIR, requires the preparation of a Construction Noise Management Plan “prior to the issuance of grading permits for the proposed Project” that would “provide a range of noise reduction between 5 dBA and 15 dBA.” Conditions requiring compliance with regulations are common and reasonable mitigation measures and serve as an appropriate performance standard. Mitigation Measure HAZ-A requires “methods and procedures in the Soil and Groundwater Management Plan shall be in accordance with current federal, state, and local regulations, and be protective of workers and the environment.” Refer to Section 5.0, Corrections and Additions, of the Final EIR for revisions to Mitigation Measure HAZ-A clarifying that Mitigation Measure HAZ-A requires full compliance with all applicable local, state, and federal regulations (including but not limited to, as applicable, OSHA Safety and Health Standards, Cal/OSHA requirements, federal, state and local waste disposal regulations, SCAQMD Rule 1166, as well as any other applicable requirements of the California Department of Toxic Substances, the Los Angeles Regional Water Quality Control Board, and the City of Los Angeles) related to the identification, excavation, transportation, and disposal of hazardous materials, including those encountered in excavated soil and dewatered groundwater. Mitigation Measure GEO-A requires the submittal of a “site-specific final geotechnical investigation and report to the City of Los Angeles for review, consistent with the requirements of the CBC, applicable Los Angeles amendments, and the California Geotechnical Survey Special Publication 117 (as amended).” Conditions requiring compliance with regulations are common and reasonable mitigation measures and serve as an appropriate performance standard. The “submittal and approval of the final geotechnical report shall be a condition of the grading and construction permits issued by the City of Los Angeles Department of Building and Safety.”

As such, the proposed Project would not impermissibly defer the formulation of mitigation due to the measures requiring the preparation of various plans or studies.

Plans and Studies Contemplated in Mitigation Measures Are Not Required to Be Developed During the Draft EIR Process or Prior to Project Approval

Comments state that Mitigation Measure TRA-B, which requires the implementation of the CTMP prior to the issuance of the relevant building permits, Mitigation Measure VIB-A, requiring the adoption of a Vibration Monitoring Plan prior to the issuance of a grading permit, and Mitigation Measure TRA-C, which

requires the preparation of a Temporary Disaster Route Plan prior to the issuance of a building permit for the proposed Project, impermissibly defer mitigation because the mitigation plans are not required to be adopted prior to Project approval or during the Draft EIR process. CEQA does not require these plans to be adopted prior to project approval or during the Draft EIR review process. As discussed above, CEQA recognizes that the development of plans or future studies may be appropriate to reflect on-the-ground conditions at the time the potential impact may occur, as well as further developments in proposed Project design during the post-entitlement phase. This allows the mitigation to be appropriately tailored to the potential impact.

The Recognition that Certain Aspects of Mitigation Measures May Be Infeasible Does Not Violate CEQA

Comments also state that Mitigation Measures CUL-A and CUL-F are ineffective because they include the words “if feasible.” For Mitigation Measure CUL-A, this recognition that regulatory requirements will be adhered to “including . . . practices that seek to avoid and preserve state-owned historical resources, when prudent and feasible,” does not render the measure ineffective but recognizes that all regulatory requirements would be adhered to the extent necessary for the pertinent resource. Mitigation Measure CUL-A includes a long list of required measures to be included in the CRMMP. Further, the language in Mitigation Measure CUL-A requiring SHPO consultation and “practices that seek to avoid and preserve state-owned historical resources, when prudent and feasible” is verbatim from the statutory requirements of Public Resources Code section 5024(a). Consistent with the requirements of CEQA Guidelines Section 15126.4(b)(3), Mitigation Measure CUL-A and CUL-F recognize that preservation in place is the preferred manner of mitigating impacts to archaeological sites, but may not be feasible, allowing for data recovery in such circumstances. Accordingly, the recognition of “feasibility” is directly consistent with the CEQA Guidelines. Mitigation Measure CUL-F recognizes that park amenity structures “will be reconfigured to avoid and/or diminish impacts to those features as feasible.” This recognizes that the extent of archaeological features at the Los Angeles State Historic Park prior to the testing phase described in Mitigation Measure CUL-E is unknown without additional testing and ground disturbance, and it is impracticable for the measure to commit to a relocation of the amenities to avoid and/or diminish impacts without knowing the exact location of the features. Mitigation Measure CUL-E provides that the proposed Project would seek to avoid any potential archaeological features. Even if avoidance is not feasible, with the implementation of the actions described in Mitigation Measures CUL-E and CUL-F, such as outlining where and in what soils mechanical excavations may or may not be used and identifying criteria thresholds for data recovery, as well as reconfiguring the location of park amenity structures as necessary following the implementation of the measures in Mitigation Measure CUL-E, potential impacts would be less than significant.

CUL-PDF-E and WFR-PDF-A Are Not Mitigation Measures

Commenters state that CUL-PDF-E and WFR-PDF-A improperly defer mitigation. CUL-PDF-E and WFR-PDF-A are Project Design Features and are accordingly intended to provide additional environmental benefits, rather than mitigate a significant impact. These Project Design Features are incorporated into the proposed Project’s design in order to further minimize environmental impacts but do not mitigate a significant environmental impact.

Commenters state that CUL-PDF-E is intended to reduce an environmental impact. Mitigation measures are provided in MM-VIB-A and MM-VIB-B to reduce potential building damage resulting from vibration, including to the *El Grito* mural. After the imposition of these measures, there will be a less than significant vibratory impact with respect to the generation of excessive groundborne vibration or groundborne noise levels. In turn, CUL-PDF-E provides for the adoption of a Construction Monitoring Plan for the *El Grito* mural, requiring that in the event that damage to the *El Grito* mural is documented as a result of construction activities, the Project Sponsor would retain an experienced professional to carry out the repairs within 12 months of the proposed Project's completion. CUL-PDF-E is appropriately a project design feature because it is not required to mitigate any environmental impacts related to cultural resources. Construction of the proposed Project is not anticipated to result in damage that would affect the mural's cultural significance,⁸⁹ but the Draft EIR nevertheless adds a Project Design Feature to provide for monitoring of the mural and repair if any damage is caused by construction activities. This is not intended to mitigate an environmental impact, but rather to provide an additional environmental benefit.

With respect to WFR-PDF-A, the Draft EIR determined that there would be less than significant impacts with respect to Wildfire. WFR-PDF-A, discussed on page 3.20-47 of Section 3.20, Wildfire, of the Draft EIR, requires the Project Sponsor to prepare a Fire Protection Plan to "further reduce risks associated with the ignition of wildland fire." Because these measures are not intended to reduce a significant impact under CEQA, but instead to provide additional environmental benefits where impacts are already considered less than significant, CEQA requirements regarding mitigation are inapplicable.

Funding for Mitigation Measures

Comments on the Draft EIR state that the proposed Project must demonstrate proof of financing for Mitigation Measures misconstrue CEQA's requirements. CEQA requires the identification of mitigation measures that could reduce the proposed Project's potential significant environmental impacts.⁹⁰ CEQA does not require a full accounting of how each mitigation measure will be funded. The Draft EIR provided a detailed list of Mitigation Measures for the proposed Project, as outlined in Table ES-2, Summary of Environmental Impacts, of the Draft EIR.

The Project Design Features and Mitigation Measures identified and analyzed in the Draft EIR are included in the Mitigation Monitoring and Reporting Program set forth in Section 7.0, Mitigation Monitoring and Reporting Program, of this Final EIR, and would be mandatory elements of the proposed Project. The Mitigation Monitoring and Reporting Program outlines the procedures for the implementation of each Mitigation Measure identified in the Draft EIR, including the monitoring agency, the timing of implementation, monitoring frequency, and actions indicating compliance with the Mitigation Measure.

The Project's Use of Project Design Features Does Not Obscure Project Impacts

CEQA Guidelines sections 15070(b)(1) and 15126.4(a)(1)(A) specifically permit the incorporation of Project Design Features designed to reduce potential adverse impacts. Commenters state that the Project Design Features are mitigation measures in disguise, intended to obscure the proposed Project's impacts, citing to *Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645 ("*Lotus*"). The Draft EIR identified

⁸⁹ Draft EIR, Section 3.13, Noise, p. 3.13-68.

⁹⁰ California Public Resources Code Section 21100(b)(3); 14 California Code of Regulations Section 15126(b)(3).

whether environmental impacts would be significant in the absence of mitigation. The proposed Project's environmental consequences were described, the need for mitigation was identified, and the sufficiency of proposed mitigation measures was considered. The Draft EIR also identified Project Design Features which would provide additional environmental benefits but which are not intended to mitigate for identified significant impacts.

Commenters state that CUL-PDF-A, CUL-PDF-B, CUL-PDF-C, CUL-PDF-D and CUL-PDF-E are mitigation measures rather than project design features. These Project Design Features are not mitigation measures to reduce potential cultural resources impacts as there are no significant or direct cultural resources impacts anticipated to the underlying resource. (See, e.g., Draft EIR, pp. 3.5-35 to 3.5-46 [discussing CUL-PDF-A, CUL-PDF-B, CUL-PDF-C, CUL-PDF-D, and CUL-PDF-E].) Within the cultural resources context, these measures are properly defined as project design features intended to provide additional environmental benefits rather than to mitigate a potential environmental impact.

Further, all of the Project Design Features and Mitigation Measures identified and analyzed in the Draft EIR are included in the Mitigation Monitoring and Reporting Program set forth in Section 7.0, Mitigation Monitoring Reporting Program, of this Final EIR, and would be mandatory elements of the proposed Project.

TOPICAL RESPONSE J**Gondola Design and Operations**

Comments on the Draft EIR address the proposed Project's gondola design and operations. Commenters question whether the proposed Project would be able to achieve the operational capacity stated in the Draft EIR, including in a manner that would enable the safe and comfortable boarding of all passengers. The proposed Project would be able to carry up to approximately 5,000 passengers per hour per direction ("pphpd"). As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would comply with the accessibility requirements of the Americans with Disabilities Act.

Commenters question how the proposed Project cabins would be supplied with adequate power. Cabins would be supplied with power by means of batteries located on each cabin. Commenters also state that the proposed Project would become unsafe and inhospitable to passenger use over time. As discussed in Section 2.0, Project Description, of the Draft EIR, the system operator would perform routine maintenance on the proposed Project and would observe the overall system on a daily basis as part of the system's startup routine. Commenters also state that passengers of the proposed Project could be exposed to unsafe conditions within cabins as a result of either other passengers or the overall system's safety. As discussed in Section 2.0, Project Description, of the Draft EIR, the cabins and overall system would be equipped with security features for passenger safety within cabins.

Finally, commenters state that passengers would be rendered unsafe in the event of an emergency affecting the wider system of the proposed Project. As discussed in Section 2.0, Project Description, of the Draft EIR, an Emergency Operations Plan would be prepared as part of the proposed Project and would set forth guidelines for a wide range of scenarios. Furthermore, aerial transit systems such as the proposed Project represent one of the safest modes of transportation relative to other forms of transit.

Capacity

As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would carry up to approximately 5,000 passengers pphpd. Based on the current design, the calculated characteristics when operating at system capacity (e.g., during Dodger games or events at Dodger Stadium) would be approximately 53 cabins in service on the system. Under this scenario, the cabins would move at an approximate speed of 13.4 miles per hour with headways of approximately 23 seconds, which represents the time between cabins arriving at a station. As one hour consists of 3,600 seconds, approximately 156.5 cabins would arrive every hour (3,600 seconds / 23 seconds).

The proposed Project's Tricable Detachable Gondola system ("3S")⁹¹ cabins typically carry between 30 to 40 passengers each, depending on the exact configuration of seating and cabin amenities selected. At a capacity of 35 passengers per cabin, at 156.5 cabins per hour, 5,478 passengers would arrive at each station per hour (35 passengers per cabin x 156.5 cabins per hour). Given that the same headway applies in each direction, the total, calculated system capacity is therefore 5,478 pphpd.

⁹¹ As discussed in Section 2.0, Project Description, of the Draft EIR, the naming convention for this system is derived from the German word "seil," which translates in English to "rope." Hence, Tricable Detachable Gondola systems are known as "3S" systems due to the use of three ropes, or cables.

To account for variations in the exact configuration of seating and cabin amenities, as well as operational considerations (including, for example, fewer than 35 people boarding a cabin or cabins being either slowed or stopped in the station for boarding purposes), the proposed Project has included an approximately 10 percent reduction in capacity from 5,478 pphpd to 5,000 pphpd.

Boarding

During typical operations, as they enter a station, the cabins would slow down to a speed of roughly one foot per second (less than one mile per hour) to allow passengers to enter and exit the moving cabin. For reference, a typical walk is approximately 3.5 feet per second, as used in the California Manual of Uniform Traffic Control Devices (CA MUTCD). This cabin deceleration is achieved by detaching the cabins from the haul rope in the station. Once a cabin is detached from the haul rope, the cabin can move at a speed independent of the haul rope. If needed, a cabin could be stopped to accommodate passenger boarding. At peak operations, it is anticipated cabins would arrive in a station approximately every 23 seconds and, once a new load of passengers has boarded, the cabin would re-attach to the cable and advance to the next station.

The boarding platforms at Alameda Station, Chinatown/State Park Station, and Dodger Stadium Station have been sized to accommodate the capacity of the proposed Project. At Alameda Station and Dodger Stadium Station, a minimum of 30 linear feet would be provided for each of the unloading and loading zones. This equates to at least 30 seconds for any unloading passengers and at least another 30 seconds for loading passengers. There is a physical separation between the unloading and loading areas. Passengers would unload from cabins on one side of the boarding platform and after a physical separation, passengers would load onto cabins on the other side of the platform. Accordingly, unloading and loading passengers would be separated. Because of this separation, all passengers on one side of those stations are moving in the same direction, encouraging efficiency and order. By way of comparison, it is typical in heavy and light rail stations for passengers to board and disembark from trains on the same platform. Because the Alameda Station and Dodger Stadium Station would separate areas for unloading and boarding, these stations would see efficiency beyond what may typically be experienced at heavy and light rail stations.

At the Chinatown/State Park Station, the boarding platform would be similarly designed to accommodate the capacity of the proposed Project. The Chinatown/State Park Station would be comprised of three levels: ground, mezzanine, and boarding. The ground level would provide elevators, escalators, and stairs that would lead up to the mezzanine. The mezzanine level would provide queueing space and provide access to the boarding platform by elevators, escalators, and stairs. Approximately 15 percent of proposed Project riders to Dodger Stadium (900 passengers in 2026 and 1,500 passengers in 2042) are expected to board the system before a game or event at the Stadium at the Chinatown/State Park Station, and queues would therefore be accommodated within the Station, given this lesser boarding demand and the larger queueing capacity at the Station.

Because the station speed of the cabins would be slower than the line speed, the station speed would enable multiple cabins to be in the station at one time. Cabins would arrive every 23 seconds during peak operations and maintain this time separation. Since a cabin would spend at least 30 seconds in the unloading zone, more than one cabin would be present in an unloading zone for some of the time.

Similarly, more than one cabin would be present in the loading zone some of the time. During peak operations, multiple cabins would be loading and unloading passengers in each station at any given time.

Accessible Boarding

As discussed in Sections 2.4.3, Stations and Junctions, and 2.4.5, Gondola Cabins, in Section 2.0, Project Description, of the Draft EIR, the stations and cabins would comply with the accessibility requirements of the Americans with Disabilities Act (“ADA”).

Pathways to and from the boarding areas would be ADA compliant with redundant vertical circulation and appropriately sized passageways. The entry width and interior size of each cabin would comply with the requirements of the ADA.

The proposed Project cabins would have level boarding, which means that there would be no step from the boarding platform surface to the cabin floor. The gaps between the boarding platform and cabin floor would comply with industry standards and ADA requirements regarding both horizontal separation and vertical alignment.

If needed, cabins could be either slowed or stopped in the station for boarding purposes. Station attendants would be located within each station to assure safe boarding and to execute stops for unloading or boarding purposes, if necessary. Attendants would also provide customer interaction and observation; if a passenger needs special assistance, an attendant may either further slow or stop a cabin. A separate operator would be stationed in a control booth monitoring screens, which would show activities in each cabin and station, as well as the system controls. The time necessary to slow or stop cabins is factored into the overall system capacity of the proposed Project.

Cabin Power

Comments on the Draft EIR address the cabins of the proposed Project and how they will be supplied with adequate electrical power. As noted in Section 2.4.5, Gondola Cabins, in Section 2.0, Project Description, of the Draft EIR, the cabins are expected to have certain amenities, including HVAC, which require electrical power.

Power for the cabins is expected to be provided by batteries located on each cabin. The batteries would be charged overnight while the cabins are stored at the subterranean cabin maintenance area below the Dodger Stadium Station. In addition, during operations, the batteries would be continuously charged by the movement of the cabins along the proposed Project alignment. Multiple technologies exist to enable continuous battery charging during system operations. The battery charging technology, as well as the size and capacity of cabin batteries, will be determined as design is completed for the proposed Project.

Privacy Glass

As discussed in Section 2.4.5, Gondola Cabins, in Section 2.0, Project Description, of the Draft EIR, cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Privacy glass is glass which has been treated to allow control of the window’s transparency. This is done by running a small electric current

through the pane of glass; when the electric current passes through the pane of glass, it changes the glass from opaque to transparent, or vice versa. The control system for the proposed Project can be programmed to turn on and off the privacy glass while cabins are adjacent to sensitive views. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizontal distance between the proposed Project cabins and the adjacent sensitive views.

Maintenance

As noted in Section 2.7.5, Maintenance, in Section 2.0, Project Description, of the Draft EIR, maintenance activities would be performed by the operator and would include daily pre-operational inspection of the system as well as long-term maintenance activities. The operation and maintenance of the system would be closely linked since the operating schedule would be the primary driver for the maintenance needs of the proposed Project. Further, the required maintenance would affect the operating schedule. As discussed in Section 2.7.6, Safety Systems and Ancillary Elements, in Section 2.0, Project Description, of the Draft EIR, maintenance recommendations including inspection procedures and scheduled activities are required to be provided by the equipment provider and would be included in the required maintenance manual. Maintenance recommendations would be akin to those provided by a vehicle manufacturer, which include a list of recommended maintenance activities (e.g., oil change, tire rotation, etc.) and when to perform them. In addition, the inspection procedures would also include circumstances that would trigger the need for additional maintenance activities.

Rider Safety

As noted in Section 2.4.5, Gondola Cabins, in Section 2.0, Project Description, of the Draft EIR, each cabin would have a security camera on board with a feed to the control room, as well as a “push to talk” button, which would open two-way communications with the control room. Since the cameras would be monitored, there is an opportunity for operation personnel to identify developing situations and intervene verbally. Operators would have communications protocols with appropriate law enforcement and first responders.

In addition to operator-initiated communications, cabins would be equipped with “push to talk” buttons to open communications with operators. Through use of these buttons, passengers can open communications with operators at any time. Operators would then be able to respond accordingly based on established safety protocols and training, which would be developed in conjunction with first responders. In the event of a security incident taking place inside a cabin, cabins would be stopped at the next immediate station in a matter of minutes. Travel times would be approximately 2.5 minutes between Alameda Station and Chinatown/State Park Station and approximately 3.5 minutes between Chinatown/State Park Station and Dodger Stadium Station.

In stations and areas adjacent to them, attendants would also be able to observe activities or disturbances. During Dodger games and events at the Stadium, it is anticipated that either additional security or additional trained staff would be present to reduce both the probability of security issues and the response time to any such situations.

Emergency Operations

As noted in Section 2.7.7, Emergency Operations Plan, in Section 2.0, Project Description, of the Draft EIR, an Emergency Operations Plan would be prepared as part of the proposed Project and would set forth guidelines for a wide range of scenarios. The Emergency Operations Plan would include emergency response protocols and safety procedures developed in conjunction with the operator, system provider, and local authorities (e.g., LAFD and LAPD). The purpose of the Emergency Operations Plan would be to determine appropriate actions in advance of situations that could impact the operation of the proposed Project. Examples of scenarios for consideration by the Emergency Operations Plan could include fires in nearby buildings or system components, bomb threats, earthquakes or other natural disasters, medical emergencies, or a system failure of the proposed Project.

Because such scenarios could involve action by, coordination with, or participation from local agencies such as LAPD or LAFD, the Emergency Operations Plan would be developed in coordination with those agencies. Formal coordination with relevant agencies on emergency protocols would commence in future design phases of the proposed Project.

As noted in Section 2.7.6, Safety Systems and Ancillary Elements, in Section 2.0, Project Description, of the Draft EIR, the proposed Project system would incorporate redundancies and robust designs to minimize the possibility of mechanical failures which prohibit the movement of the gondola cabins. Examples of redundancies include installation of two independent motors so that if the primary motor fails, the second motor would be utilized to unload passengers from the system. Additional redundancies could include elements such as bullwheels, brakes, and conveyors. In a number of failure scenarios, it would be possible to assess the failure, switch to an alternate mode or component and proceed with operations.

For an example of how a redundancy might operate in practice, it is possible that a set of cabin doors might fail to confirm that they are locked properly. The system would initiate a stop while the cabin is still in the station and an operator would investigate. If something was simply obstructing the doors, the locking sequence could be repeated and confirmed, and the cabin and system could resume operations normally. If, however, there was a problem either with the doors or with the sensors that should confirm the locked position, the passengers in the cabin could be relocated to another cabin, and the inoperable cabin would be removed from service and repaired.

The use of these redundancies would reflect the philosophy not only that unplanned outages are inconvenient, but that the safest place for passengers is in the cabin, and that the safest way for passengers to exit cabins is at a station. However, the Emergency Operations Plan would also consider the unlikely scenario that the system and cabins cannot be moved to the nearest station and that passengers must therefore be evacuated directly from the cabins. As discussed in Section 2.7.7, Emergency Operations Plan, in Section 2.0, Project Description, of the Draft EIR, such an evacuation would involve emergency response services and would use specialized equipment such as ladder trucks, bucket trucks, or descending devices. An Evacuation Plan would be developed as part of the Emergency Operations Plan as required by industry standard ANSI B77.1 and Cal/OSHA regulations, to describe the preferred methods of evacuation based on the location of cabins, environmental conditions, and unusual terrain. The Evacuation Plan would include the required equipment and procedures for evacuation, site control, and

passenger communications. Analysis and coordinated practice of the evacuation modes would be performed in advance of opening the system. The Evacuation Plan would document the procedures, equipment and personnel necessary to evacuate the system, as well as provide for documenting training and practice. Such analysis, practice, and documentation are required by Cal/OSHA.

ANSI B77.1 requires that the Evacuation Plan include at a minimum:⁹²

- a) the definition of the line of authority in the event of an evacuation. This line of authority shall list:
 - 1) the positions responsible for determining the need for and ordering of an evacuation by use of the evacuation power unit or evacuation from carriers;
 - 2) the personnel responsible for performing the evacuation, for first aid, and for ground care of evacuated passengers.
- b) a description of the equipment necessary for evacuation and where it will be stored;
- c) provisions for adequate training in the functions performed in the evacuation process at least once each operating season. The training shall address variables including, but not limited to, the type of carriers and grips, passenger demographics, adaptive equipment, and topography as well as evacuation systems and equipment. Training shall be recorded in the evacuation log;
- d) an estimate of the time necessary for the total evacuation of each aerial lift;
- e) a description of unusual terrain, surface vegetation, and other conditions under the aerial lift and how each of these conditions will be dealt with during an evacuation;
- f) an estimate of when the evacuation should begin in the event the aerial lift becomes inoperable;
- g) provisions for communications with passengers of an inoperable aerial lift, the frequency of such communication, how soon after the aerial lift becomes inoperable such communication to the passengers will start, and the frequency of communications thereafter;
- h) the methods of evacuation to be used for the typical passenger, incapacitated passenger, common adaptive ski equipment (e.g., SMB's), and non-ambulatory passengers;
- i) provisions for communication with the evacuation teams;
- j) provisions for suspending the evacuation in the event that the aerial lift is made operable during the evacuation;
- k) provisions for control and assistance of evacuated persons until released;
- l) provision for emergency lighting for evacuations that occur in or may extend into the hours of darkness; and
- m) provisions for a post-evacuation report.

⁹² Text is quoted from ANSI B77.1-2022, 3.3.2.5.7 Evacuation.

The Evacuation Plan for the proposed Project would comply with the requirements of ANSI B77.1 as applicable to urban gondola systems and other applicable standards and requirements as determined by the City of Los Angeles, Metro, Cal/OSHA, and/or other appropriate agencies during the permitting process for the proposed Project.

Safety and Security of Gondolas and Similar Aerial Systems

As discussed in Section 2.2, ART Background, in Section 2.0, Project Description, of the Draft EIR, forms of aerial transit technology have been available and utilized for the last 100 years. Modern applications have seen the evolution of aerial transit technology as a feasible and safe mode of urban rapid transit. In addition to the numerous urban aerial transit systems referred to in Table 2-1, ART Precedents, in Section 2.0, Project Description, of the Draft EIR, one of the most widely known examples of aerial transit can be found in the thousands of aerial ropeways in ski areas across North America. At five times safer than an elevator, gondolas and other aerial systems are exceptionally safe and secure modes of transportation.⁹³ Refer also to Topical Response M, Comparable Urban Aerial Transit Systems, discussing how, like the proposed Project, comparable urban aerial transit systems in cities around the world operate safely, efficiently, and in concert with their surrounding urban environments.

As discussed in Section 2.7.7, Emergency Operations Plan, in Section 2.0, Project Description, of the Draft EIR, system components would be equipped with security features for system safety. The gates and entrances to the stations would be locked at night and would be equipped with security features to prevent entrance by unauthorized personnel. The towers would have no publicly accessible gates or entrances and would be inaccessible to unauthorized personnel. Maintenance doors at the base of the towers would be secured at all times and only accessible by authorized personnel. The system components would be equipped with security cameras to monitor activity at stations, the junction, the towers, and in each cabin. Moreover, attendants would be present at each station during operations, and operators in the control room would monitor activity throughout the proposed Project during both operational and non-operational hours.

During operational hours, all stations would be staffed by trained personnel with the ability to prevent individuals from causing damage to the system and communicate concerns to law enforcement or the operator booth. During non-operational hours, Dodger Stadium Station would be staffed with personnel performing maintenance and other activities, and operators in the control room would monitor activities throughout the proposed Project.

The proposed Project would include the following, additional safety and security measures:

- Access-restricting Design – As proposed, stations, junction, and tower would have limited, controllable access to critical areas and components. Towers would be designed to prevent climbing, and access ladders needed for authorized employees would be located inside the towers behind locked maintenance doors. Stations would have gates and other barriers that prevent physical access to equipment within. Additional layers of security including locked doors and

⁹³ National Ski Areas Association, NSAA Ski Lift Safety Fact Sheet (2016).

gates within the restricted areas would prevent trespassing and enable the operator to coordinate the applicable response from security personnel.

- Alarms – With access limited to particular routes, doors or other access points could be alarmed to signal their opening. Motion detectors could be used to indicate when unauthorized activity is present in restricted areas.
- Active Monitoring and Training – Multiple cameras and other technology could provide visibility to and information about locations across the system. By combining training, local familiarity, alarms and other data, staff would have the situational awareness to understand and respond to unauthorized activity.

TOPICAL RESPONSE K

Signage and Lighting

Comments on the Draft EIR address the Project's proposed signage as well as lighting. The Draft EIR addressed signage and lighting in Section 3.01, Aesthetics, with supporting data provided in Appendix C, Visual Impact Assessment, of the Draft EIR.

Proposed Signage

As discussed, in Section 2.0, Project Description, of the Draft EIR, similar to other transit projects that incorporate signage, the proposed Project would include signage to support wayfinding for transit passengers, including information about transit connections and other important information to facilitate transit usage. Private funding for the proposed Project is anticipated to be supported by naming rights and sponsorship revenues, and such sponsors would be recognized in Project signage, which would be designed consistent with applicable Metro, City, and State approval requirements. Further, all signage for the proposed Project would require approvals from applicable agencies.

A Sign Concept Plan for the proposed Project was included in Appendix B of the Lighting Study, which is included as Appendix C to Appendix C, Visual Impact Assessment, of the Draft EIR. The Sign Concept Plan includes renderings of the Alameda Station, Alameda Tower, and gondola cabins showing the proposed signage. In addition, the Sign Concept Plan includes detailed drawings showing the proposed location for each sign and a signage schedule that provides:

- sign numbers;
- sign types;
- information on whether the sign is static or digital;
- information on whether the sign is illuminated or non-illuminated;
- sign design, e.g., platform mounted, hanging, wall-mounted, wrap, etc.;
- information on whether the sign is interior or exterior facing;
- sign area including the width and height; and
- description of each sign.

The Sign Concept Plan provides that across the entire proposed Project, including stations, the junction, towers, and cabins, the proposed Project is proposing approximately 61,189 square feet of signage, which would include approximately 59,889 square feet of static signage and approximately 1,300 square feet of digital signage. The digital signage would be limited to the Alameda Station and the Dodger Stadium Station. No digital signage is proposed on the exterior of the cabins. At the Alameda Station and the Dodger Stadium Station, the proposed Project proposes 400 square foot digital signs that would be interior facing for transit riders (for a total of 800 square feet, for one sign at the Alameda Station and one sign at the Dodger Stadium Station). The additional digital square footage is proposed as smaller freestanding digital displays that would be designed to activate the pedestrian environment. One would be located at Alameda Station with four located along the pedestrian connection between Dodger

Stadium Station and Dodger Stadium. Signage proposed for the exterior of the cabins is static non-illuminated naming rights signage. In addition to the naming rights signage, the proposed Project is proposing that two cabins be designated for the display of community programming graphics and that one cabin be designated for the display of artwork by local arts collaborators.

The proposed signage program is an important component of the proposed Project to support wayfinding, transit connection, and funding for the proposed Project. The type and extent of the permitted signage would support the transit use and reflect that the proposed Project provides access between the Dodger Stadium property, the surrounding communities, including Chinatown, Mission Junction, Elysian Park, and Solano Canyon, and the Los Angeles State Historic Park, to the regional transit system accessible at Los Angeles Union Station (“LAUS”). Signage would be designed to complement the proposed Project design and use and would be consistent with the existing urban condition, as illustrated in Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, which includes Key Observation Points (KOPs) updated in part to incorporate the proposed Project’s signage program, as depicted in the signage package included in the Lighting Study included in Appendix C, Visual Impact Assessment, of the Draft EIR. As discussed in Appendix C, Visual Impact Assessment, of the Draft EIR, and Section 5.0, Corrections and Additions, of the Final EIR, based on the supplemental KOPs prepared to support evaluation of the potential impacts of the proposed Project on aesthetic and visual resources, including to incorporate the proposed Project’s signage program and clarify design elements of the proposed Project, the conclusion that the proposed Project would not have a significant impact to aesthetic and visual resources remains unchanged.

As discussed in Appendix C, Visual Impact Assessment, to the Draft EIR, there is existing signage in the Project area, and the proposed Project signage would not substantially degrade the existing visual character or quality of public views. Instead, the proposed Project’s design ensures that signage would enhance the public realm. Specifically, signage for the proposed Project would be architecturally integrated into the design of the ART system, including its stations, the junction, towers, and cabins, and would be designed consistent with applicable Metro, City, and State approval requirements. In addition, consistent with the City’s Framework Element Chapter 5 Urban Form and Neighborhood Design Policy 5.8.4, signage would also be designed to be integrated with the architectural character of the surrounding buildings to convey a visually attractive character. Further, as illustrated in Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, the type and extent of proposed signage would emphasize the transit use of the proposed Project and would complement the existing and approved signage environment along the proposed Project alignment. The proposed Project’s signage would create a uniform visual identity that would connect the entire proposed Project alignment.

Sign District and Sign Regulations

As discussed on page 2-62, in Section 2.0, Project Description, of the Draft EIR it is anticipated that the proposed Project would seek a Sign District to establish a comprehensive set of sign regulations for the proposed Project consistent with applicable City requirements. The Sign District would provide limitations on the types, amounts, locations, sizes, operating hours, and illumination of permitted signs.

Regarding sign content, Los Angeles Municipal Code Section 14.4.4 prohibits signs that contain obscene matters, as defined in Section 311 of the Penal Code of the State of California. Outside of the prohibition

on obscene matters, signs have free speech protections under the First Amendment of the United States Constitution, and, accordingly, sign regulations are generally content-neutral and instead focus on time, place, and manner regulations. As noted above, the proposed Project's signage would be designed to be consistent with Metro requirements, including Metro's Advertising Content Guidelines, as applicable, which are updated from time to time.⁹⁴ Metro's Advertising Content Guidelines include a number of restrictions on advertising including prohibiting the advertising of all alcohol, tobacco, and cannabis products services and events. Metro's Advertising Content Guidelines also provide that advertising may not be displayed if its content involves: illegal activity; violence; demeaning or disparaging matter; vulgarity; obscene matter; adult entertainment and content; political endorsements; religion, negative connotations of public transit; unsafe transit behavior; content injurious to Metro's interests; or content harmful or disruptive to the transit system.

Lighting

As discussed on pages 3.1-52 and 3.1-53, in Section 3.01, Aesthetics, of the Draft EIR, Project lighting would include low-level lighting for security and wayfinding purposes adjacent to and within the stations, junction, towers, within cabins, at the vertical circulation, and areas for ticketing, fare checking, and queueing. In addition, low-level lighting to accent signage, architectural features, landscaping, adjacent pedestrian plazas, and potential mobility hubs would be installed at the stations, junction, and towers. Lighting would also be provided underneath the elevated stations and junction.

The Lighting Study analyzed the proposed Project's potential environmental impacts resulting from the Project's lighting and illuminated signage program with respect to light trespass and glare. The proposed Project's lighting design is detailed in Appendix A: Building Lighting Concept Plan of the Lighting Study and the proposed Project's illuminated signage design is detailed in Appendix B, Sign Concept Plan, of the Lighting Study. The Lighting Study analyzed the proposed Project for compliance with the Los Angeles Municipal Code, CALGreen, the Cornfield Arroyo Seco Specific Plan ("CASP"), the River Improvement Overlay (RIO) District, and the California Vehicle Code and determined that the proposed Project's impacts with respect to light trespass and glare would be less than significant.

Los Angeles State Historic Park

The Lighting Study analyzed the entire proposed Project alignment, including the Los Angeles State Historic Park. The analysis of trespass impacts to the Los Angeles State Historic Park is reflected in the analysis at VP-S4 and detailed on pages 41- 42 and 44-48 of the Lighting Study, and the analysis of glare impacts to the Los Angeles State Historic Park is reflected in the analysis at M4 and detailed on pages 49-53 of the Lighting Study. As detailed in the Lighting Study, light trespass and glare impacts to the Los Angeles State Historic Park would be less than significant.

Cabin Interior

As discussed on page 55 of the Lighting Study (and in Appendix A, Building Lighting Concept Plan, of the Lighting Study), the lighting for the proposed Project was designed to provide the necessary illumination for passengers to safely board and enjoy the proposed Project. As explained in the Building Lighting

⁹⁴ Metro's Advertising Content Guidelines are accessible at <https://www.metro.net/about/advertising-sponsorships-filming>.

Concept Plan, the illuminance design standards for the proposed Project were developed in accordance with the California Electric Code, the Illuminating Engineering Society (IES) recommendations and transit system operation standards prepared in coordination with the proposed Project's lighting, design, and gondola systems technical consultants. As it relates to the cabins, page 56 of the Lighting Study indicates that the basis of design for cabin lighting is a 5 footcandle average at the floor and a 2 footcandle minimum in the cabin. As explained on page 68 of the Lighting Study, this cabin lighting level was selected to ensure that the cabins would provide a comfortable and safe interior illumination. As further detailed on page 68 of the Lighting Study, the light source for the cabins includes concealed low level linear lights, as well as downlighting that would be used to increase the cabin lighting levels during loading and unloading and in emergency situations. These light levels would ensure safe and comfortable operation of the cabins consistent with Metro policies and recommended practice for transit systems.

TOPICAL RESPONSE L**Project Sponsor and Proposed Project Costs and Financial Analysis**

Comments on the Draft EIR address or raise questions regarding the Project Sponsor and how the proposed Project would be funded. Because comments regarding the Project Sponsor and how the proposed Project would be funded do not raise substantive issues on the content of the Draft EIR, no further response is required by CEQA. Nevertheless, this topical response provides the following information.

The Project Sponsor, LA Aerial Rapid Transit Technologies LLC (“LA ARTT LLC”), was originally a subsidiary of Aerial Rapid Transit Technologies LLC (“ARTT LLC”). ARTT LLC has donated LA ARTT LLC and the proposed Project to Zero Emissions Transit (“ZET”). ZET is a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. Section 4.0, Costs and Financing, of the Final EIR provides detail as to the proposed Project’s capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project’s capital funding would primarily be sourced from bond financing serviced by revenue from the Project. The proposed Project is not seeking Metro funding. In addition, no other public sources of funding have been sought or committed to the proposed Project.

Project Sponsor

In 2018, the proposed Project was proposed by Aerial Rapid Transit Technologies LLC (“ARTT LLC”), an entity created by McCourt Global. The Project Sponsor, LA Aerial Rapid Transit Technologies LLC (“LA ARTT LLC”), was originally a subsidiary of ARTT LLC. ARTT LLC has donated LA ARTT LLC and the proposed Project to Zero Emissions Transit (“ZET”), a nonprofit and supporting organization to Climate Resolve, a California nonprofit public benefit corporation. ZET’s purposes include promoting and supporting zero emissions transportation initiatives and other efforts to reduce greenhouse gas (GHG) emissions in the transportation sector and to mitigate and adapt to changes in weather and climate. These organizational purposes and activities include collaborations to champion equitable climate solutions, working on easier and safer ways to get around Los Angeles that also reduce GHG emissions, and advocating for mobility options that are sustainable, safer, and improve public health by investing in better transit and safer active transportation options for Los Angeles. To this end, ZET plans to identify and support zero-emission transportation initiatives and other projects, programs, and policies that will mitigate climate change, including the proposed Project.

ARTT LLC’s donation of LA ARTT LLC and the proposed Project includes ARTT LLC’s continued support of the proposed Project with financial support and expertise, including to reimburse Metro in its role as the Lead Agency for the EIR and funding for consultant and technical work for the EIR. As set forth in Section 8.0, List of Preparers, of the Draft EIR, and Section 9.0, List of Preparers, of the Final EIR, consultant and technical work for the EIR includes AECOM as to Draft EIR preparation and several environmental issue areas, including as to archaeology, paleontology, biological resources, geological resources, hydrology and water quality, and noise and acoustics; Kimley-Horn as Final EIR preparation and several environmental issues areas, including archeology, noise, and utilities; Fehr & Peers as to transportation; ENGEO Incorporated as to geology and soils; GPA Consulting, Teresa Grimes, and Historic Resources Group as to historical resources; Ramboll US Consulting, Inc. as to air quality/HRA, energy, and greenhouse gas

emissions; AES as to noise and vibration; Reax Engineering Inc. as to wildfire; SCJ Alliance as to gondola systems; PCL Construction Services, Inc. as to construction; Nabih Youssef Associates Structural Engineering as to structure engineering; Johnson Fain and SCJ Alliance as to Planning; RIOS as to design; Francis Krahe & Associates, Inc as to lighting; Carlberg Associates as to trees; and VMC LLC as to airspace analysis.

Costs and Financial Analysis

Section 4.0, Costs and Financing, of the Final EIR, provides detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding. The proposed Project's capital costs to construct are estimated at \$385 – 500 million and assume prevailing wages pursuant to a Project Labor Agreement. The primary source of capital funding for the proposed Project is from bond financing serviced by revenue from the proposed Project. The primary sources of revenue for the proposed Project are farebox revenues and naming rights sponsorship revenue. Proposed Project annual operations and maintenance costs are projected at approximately \$8 – 10 million per year (inclusive of capital reserve funds) and assume prevailing wages. Operation and maintenance costs are proposed to be fully funded out of proposed Project revenues.

The proposed Project is not seeking Metro funding. In addition, no other public sources of funding have been sought or committed to the proposed Project.

TOPICAL RESPONSE M

Comparable Urban Aerial Transit Systems

Comments on the Draft EIR address other urban aerial transit systems around the world. The Draft EIR discusses numerous aerial transit systems in other locations around the world that serve as precedents for the proposed Project. Like the proposed Project, comparable aerial transit systems have been shown to operate safely and efficiently and provide benefits to their surrounding communities.

Comparable Systems Enable Faster Transit and Facilitate Commerce

As discussed in Section 2.0, Project Description, of the Draft EIR, modern aerial transit systems are currently in operation in numerous urban locations around the world. These locations range from cities within the United States—e.g., Portland, Oregon and New York, New York—to cities in Asia, Europe, and South America. Such comparable systems demonstrate the versatility of aerial transit systems to operate in diverse environments and represent a sample of the numerous models for the proposed Project.

Comparable aerial transit systems in other cities and countries have brought benefits to their surrounding areas by connecting disparate neighborhoods, promoting commerce, beautifying communities, and enhancing transit system rider safety. As shown in Table 2-1, ART Precedents, in Section 2.0, Project Description, of the Draft EIR, a 3S aerial gondola system opened in 2022 in Toulouse, France (“Téléo”) and is currently operating along a 1.67-mile segment. With a cabin size of 34 people, the Toulouse system has a capacity of transporting 2,000 people per hour per direction and a ride time of 10 minutes. Annual ridership of Téléo is estimated to be 2.5 million people. Téléo connects three major economic and educational hubs of the city: Rangueil Hospital, the University Cancer Institute, and Paul Sabatier University.⁹⁵ The total employment across these three institutions represents 85,000 people.⁹⁶ Moreover, the aesthetic design of Téléo has received accolades for its integration with and enhancement of the surrounding environs, including approval by the French architectural association Bâtiments de France.⁹⁷

Recently, the “Burnaby Mountain Gondola” was proposed in British Columbia, Canada. The Burnaby Mountain Gondola is a 3S aerial gondola system proposed to connect Simon Fraser University with TransLink, the statutory authority responsible for the regional transportation network of Metro Vancouver in British Columbia, Canada. Located in British Columbia’s third-largest city and a municipality of Metro Vancouver, the Burnaby Mountain Gondola is expected to bring transportation and commercial benefits to the surrounding area. Simon Fraser University represents a major employment and economic hub in the region, and approximately 25,000 trips are made up and down Burnaby Mountain each day.⁹⁸ During peak periods, the Burnaby Mountain Gondola would depart approximately every minute and transport approximately 3,000 passengers per hour per direction.⁹⁹ Whereas currently the average length of a bus trip is between 15 and 45 minutes, the travel time on the Burnaby Mountain Gondola would be

⁹⁵ Poma. 2021. Téléo. Available at: <https://www.poma.net/en/work/teleo> (accessed September 20, 2023).

⁹⁶ Ibid.

⁹⁷ Seilbahnen International. 2022. “THE FRENCH CITY TOULOUSE NOW HAS AN URBAN 3S CABLE CAR.” Available at: <https://www.simagazin.com/en/si-urban-en/the-french-city-toulouse-now-has-an-urban-3s-cable-car> (accessed September 20, 2023).

⁹⁸ Translink. Burnaby Mountain Gondola. Available at: <https://www.translink.ca/plans-and-projects/projects/rapid-transit-projects/burnaby-mountain-gondola> (accessed September 20, 2023).

⁹⁹ Translink. 2021. Burnaby Mountain Gondola: Route Selection Report. Available at: <https://www.translink.ca/-/media/translink/documents/plans-and-projects/rapid-transit/burnaby-mountain-gondola/route-selection-report/route-selection-report.pdf#view=fitH> (accessed September 20, 2023).

approximately six minutes.¹⁰⁰ Like the proposed Project, the Burnaby Mountain Gondola would thus enable shorter travel times for commuters and nearby residents, more frequent service, and reduced noise, traffic, and emissions for the surrounding communities.¹⁰¹

In Utah, the Utah Department of Transportation (“UDOT”) released a Final Environmental Impact Statement (“Final EIS”) in August 2022 for an integrated transportation system in Little Cottonwood Canyon, Utah.¹⁰² In the Final EIS, UDOT selected an aerial gondola system (the “Little Cottonwood Canyon Gondola”) as the preferred alternative for the transportation system. Located in a mountainous region popular for skiing, the Little Cottonwood Canyon Gondola would improve mobility along State Route (S.R.) 210 and would substantially improve average travel time from 80-85 minutes by car to 43 minutes by gondola.¹⁰³ Due to the risk of avalanches in the area, road closures for avalanche mitigation are frequent, causing up to four-hour travel delays along S.R. 210 and spillover traffic in nearby neighborhoods.¹⁰⁴ Like the proposed Project, the Little Cottonwood Canyon Gondola would thus provide benefits to local residents in offering an alternative mode of transportation along S.R. 210 for visitors, alleviating spillover traffic, easing parking burdens, and improving air quality in nearby communities.

As shown in Table 2-1, ART Precedents, in Section 2.0, Project Description, of the Draft EIR, in Bolivia, a monocabable detachable gondola system (“Mi Teleférico”) connects La Paz to neighboring cities, including the mountaintop city of El Alto. With a capacity of 3,000 people per hour per direction, Mi Teleférico transports more than 230,000 people per day across its entire network and routinely operates at its peak design capacity during commuting hours between 7:00 and 9:00 A.M.¹⁰⁵ Mi Teleférico reduces trip times from over one hour by car to 10-17 minutes by cable car.¹⁰⁶ In addition, the system components of Mi Teleférico have been hailed for their ability to integrate seamlessly into the densely populated environment of La Paz, due to their compact size relative to those of other modes of public transit.¹⁰⁷

In Mexico, an aerial transit system (“Cablebus”) operates along a 5.7-mile alignment in northern Mexico City. Across 377 cabins carrying up to 10 passengers each, Cablebus can transport as many as 5,000 people per hour between its six stations.¹⁰⁸ The Cablebus system has been reported to reduce travel times in Mexico City from as much as 50 minutes by car to 19 minutes by aerial transit.¹⁰⁹ More recently, an expansion of the Cablebus system (“Cablebus 2”) began operations in 2021 in southeastern Mexico City, located in the district of Iztapalapa. Operating over nearly seven miles, Cablebus 2 can carry as many as

¹⁰⁰ Translink. Burnaby Mountain Gondola. Available at: <https://www.translink.ca/plans-and-projects/projects/rapid-transit-projects/burnaby-mountain-gondola> (accessed September 20, 2023).

¹⁰¹ City of Burnaby. 2019. Burnaby Mountain Gondola Transit Project Report. Available at: <https://pub-burnaby.escribemeetings.com/filestream.ashx?DocumentId=43307> (accessed September 20, 2023).

¹⁰² Utah Department of Transportation. Little Cottonwood Canyon Environmental Impact Statement. Available at: <https://littlecottonwoodeis.udot.utah.gov> (accessed September 20, 2023).

¹⁰³ Utah Department of Transportation. Little Cottonwood Canyon EIS: Project Overview and Final EIS Alternatives Summary. Available at: https://littlecottonwoodeis.udot.utah.gov/wp-content/uploads/2022/08/LCC_FEIS_00b_Summary.pdf (accessed September 20, 2023).

¹⁰⁴ Utah Department of Transportation. Little Cottonwood Canyon EIS: Executive Summary. Available at: https://littlecottonwoodeis.udot.utah.gov/wp-content/uploads/2022/08/LCC_FEIS_00b_Summary.pdf (accessed September 20, 2023).

¹⁰⁵ Doppelmayr/Garaventa. 2023. Utilization: Linea Morada Section 1.

¹⁰⁶ CNBC. 2018. “How cable-car systems are revolutionizing public transport almost 12,000 feet above sea level.” Available at: <https://www.cnbc.com/2018/12/07/how-cable-car-systems-are-revolutionizing-public-transport-in-la-paz.html> (accessed September 20, 2023).

¹⁰⁷ Ibid.

¹⁰⁸ Techxplore. 2021. “Commuters escape Mexico City gridlock in new cable car.” Available at: <https://techxplore.com/news/2021-07-commuters-mexico-city-gridlock-cable.html> (accessed September 20, 2023).

¹⁰⁹ Leitner. 2021. “Cablebus 2 Gondola Lift in Mexico City Now Ready for Operation.” Available at: <https://www.leitner.com/en/company/news/detail/cablebus-2-gondola-lift-in-mexico-city-now-ready-for-operation> (accessed September 20, 2023).

50,000 people per day over seven stations.¹¹⁰ Travel times via Cablebus 2 are similarly reduced by a significant margin, from up to one hour and 15 minutes by car to 36 minutes by aerial transit.¹¹¹

As shown in Table 2-1, ART Precedents, in Section 2.0, Project Description, of the Draft EIR, a monocabable detachable gondola (“Mexicable”) operates along a 3-mile distance in Mexico City, Mexico. With a cabin size of 10 people, the annual ridership of Mexicable is estimated to be 7.3 million. Mexicable serves to connect the hillside municipality of Ecatepec to the broader Mexico City Metro public transit system.¹¹² Passengers of Mexicable are able to bypass the significant vehicle traffic near the Mexico-Pachuca highway, reducing travel times to 17 minutes by aerial transit from upwards of 90 minutes by car.

In Colombia, an aerial transit system (“Metrocable”) operates throughout a network that connects the innermost areas of Medellín to communities lying in the hillsides of the Aburrá Valley. Metrocable comprises an integral part of Medellín Metro, the city’s public transportation system, serving residents who commute to and from Medellín’s city center.¹¹³ Since its initial opening in 2004, Metrocable has reduced travel times throughout the city dramatically, from as much as two hours by car to 30 minutes by aerial transit.¹¹⁴ Moreover, by making transportation more accessible to outlying, disadvantaged communities, Metrocable has been found to enable greater job access, which in turn has led to higher incomes for residents with access to the Metrocable system.¹¹⁵

In Bogotá, Colombia, an aerial transit system (“TransMiCable”) operates along a 2-mile route that connects the Ciudad Bolívar District to Bogotá’s Integrated Public Transport System, the city’s public transportation system.¹¹⁶ With a capacity of 3,600 people per hour per direction, TransMiCable has one of the highest capacities among aerial transit systems around the world, reducing travel times for the approximately 20,000 daily passengers from up to one hour and 20 minutes by bus to 15 minutes by aerial transit.^{117,118} Local businesses have also benefited from the increased flow of customers, and new businesses have sprouted up as a direct result of the increased foot traffic near TransMiCable stations.¹¹⁹

Like such systems, the proposed Project would enable faster transit and facilitate commerce for businesses and consumers along the system alignment. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Just as comparable systems such as Mi Teleférico are able to operate at peak capacity during commuting hours, the proposed Project would be able to operate at its peak design

¹¹⁰ Ibid.

¹¹¹ The Gondola Project. 2021. “Cablebus 2 Gondola Lift in Mexico City Officially Opens.” Available at: <https://www.gondolaproject.com/2021/08/17/cablebus-2-gondola-lift-in-mexico-city-officially-opens> (accessed September 20, 2023).

¹¹² ParCitypatory. 2019. “Connecting the Outskirts to City Centre with Cable Cars.” Available at: <https://parcitypatory.org/2019/06/08/mexicable> (accessed September 20, 2023).

¹¹³ Axios. 2023. “Medellín and the power of public transportation.” Available at: <https://www.axios.com/2023/02/07/medellin-mass-transit> (accessed September 20, 2023).

¹¹⁴ Ibid.

¹¹⁵ Mihoko Matsuyuki, et al. 2020. Impact of aerial cable car in low-income area in Medellín, Colombia. Available at: <https://www.sciencedirect.com/science/article/pii/S2352146520305676> (accessed September 20, 2023).

¹¹⁶ The Gondola Project. 2018. “Colombian Capital Opens First Urban Gondola.” Available at: <https://www.gondolaproject.com/category/installations/transmicable> (accessed September 20, 2023).

¹¹⁷ Ibid.

¹¹⁸ International Finance Corporation. 2020. A Cable Car Named Development. Available at: https://www.ifc.org/wps/wcm/connect/news_ext_content/ifc_external_corporate_site/news+and+events/news/cm-stories/bogota-cable-car (accessed September 20, 2023).

¹¹⁹ Ibid.

capacity on game days and during other events at Dodger Stadium. Given the capacity of the proposed Project, approximately 20 percent of the fans could take aerial transit connected to Metro’s regional transit system, which is equal to roughly 1,000,000 passengers per year at Dodger Stadium alone. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Further, in creating a new transit connection, the proposed Project would bolster commercial activity in the surrounding areas. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide numerous benefits to, and opportunities for potential partnerships with, local businesses.

Comparable Systems Promote Public Art

Like the proposed Project, comparable urban aerial transit systems promote the creation of public art and enable opportunities for cities to collaborate with local artists to beautify their neighborhoods. In Ecatepec, Mexico City, the Mexicable has galvanized the creation of as many as 52 works of street art and sculptures surrounding the system’s alignment. Like the proposed Project, Mexicable enabled collaborations with numerous local and international artists to design public art that now line the system’s route to be viewed by passengers and local residents alike.¹²⁰ With the proliferation of public art along the Mexicable alignment, residents and local businesses have reported greater numbers of visitors and a renewed interest in Ecatepec.¹²¹ Likewise, along the route of Cablebus 2, the Iztapalapa local government has hired as many as 140 local artists to enliven the neighborhood with color, commissioning nearly 7,000 largescale pieces of public art and paintings.¹²² Colorful murals have been painted on the sides of buildings and on rooftops, making them visible to pedestrians on the ground as well as passengers in the air.¹²³ Refer to Topical Response C, Project Features, for discussion of the proposed Project’s commitment to provide opportunities to collaborate with and showcase local artists along the system alignment.

Comparable Systems Increase Safety and Reduce Crime

Other gondola systems around the world have been shown to reduce violent crime in nearby areas. In Medellín, Colombia, a study of the city’s MetroCable, an urban gondola system, showed that transit-oriented development around the system was accompanied by investments in neighborhood infrastructure.¹²⁴ Such investments were in turn associated with a 66-percent decline in the homicide rate and a 75-percent decline in resident reports of violence in neighborhoods with access to the system, demonstrating that investments in aerial transit systems can contribute to a reduction in violent crime.¹²⁵

In addition to statistical studies, residents of cities with aerial transit systems have reported a greater sense of security when riding aerial transit relative to other modes of public transportation. In Bolivia,

¹²⁰ The Gondola Project. 2016. Mexicable Murals: Mexico’s First Urban Cable Car. Available at: <https://www.gondolaproject.com/2016/08/31/mexicable-murals-mexicos-first-urban-cable-car> (accessed September 20, 2023).

¹²¹ The New York Times. 2016. “Near Mexico City, Cable Car Lets Commuters Glide Over Traffic.” Available at: <https://www.nytimes.com/2016/12/28/world/americas/mexico-city-mexicable.html> (accessed September 20, 2023).

¹²² The New York Times. 2021. “Frida Kahlo, Aztec Gods: Can Art Lift Up a Poor Neighborhood?” Available at: <https://www.nytimes.com/2021/10/14/world/americas/mexico-city-iztapalapa-murals.html> (accessed September 20, 2023).

¹²³ Ibid.

¹²⁴ Magdalena Cerda, et al. 2012. Reducing violence by transforming neighborhoods: a natural experiment in Medellín, Colombia. Available at: <https://pubmed.ncbi.nlm.nih.gov/22472117> (accessed September 20, 2023).

¹²⁵ Ibid.

residents of La Paz have expressed that Mi Teleférico is safer than local minibuses, as the latter are frequently packed to capacity with passengers, which often include pickpockets.¹²⁶ Similarly, regular passengers of the Cablebus in Mexico City have reported that despite high incidents of theft in public transportation, they experience a greater sense of security when riding the Cablebus and thus prefer it to other transit modes.¹²⁷ And in Ecatepec, residents have expressed similar preferences to taking Mexicable over buses given how frequently bus passengers become victim to crime in the area.¹²⁸

In line with such comparable systems, as discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would be equipped with security features to ensure the safety of passengers. Each gondola cabin would have a security camera on board with a feed to the control room, as well as a “push to talk” button, which would open two-way communications with the control room. The control room would be able to address all cabins at once, or an individually selected cabin. Control room operators would have the ability to contact local security, law enforcement or other emergency response agencies as needed.

Comparable Systems Operate Safely, Efficiently, and in Concert with Adjacent Residential, Schools, and Open Space

Comments on the Draft EIR address the proximity of the proposed Project to houses, schools, and open space. Comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with their surrounding urban environments.

As shown in Table 2-1, ART Precedents, in Section 2.0, Project Description, of the Draft EIR, the Portland Aerial Tram in Portland, Oregon connects nearby medical office buildings and high-rise residential uses to the Oregon Health and Science University (OHSU) and the OHSU Hospital, operating between terminals located at Portland’s South Waterfront District and Marquam Hill. The Portland Aerial Tram flies over the residential neighborhood of Lair Hill, which is home to the South Portland Historic District, a historical residential neighborhood.¹²⁹ The Portland Aerial Tram has also provided community benefits to the surrounding area, including bike-share and mobility improvements and a pedestrian bridge connecting the Lair Hill neighborhood to South Waterfront. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first- and last-mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station.

The Portland Aerial Tram is also one of numerous aerial transit systems that operate safely in seismically active areas. Aerial transit systems routinely operate in areas with regular earthquake activity, including North American cities such as Mexico City, Mexico, South American cities such as Quito, Ecuador and Bogota, Colombia, and European and Asian cities such as Ankara and Istanbul, Türkiye. Refer to

¹²⁶ NPR. 2014. “High in the Andes, Bolivia’s Gondolas in the Sky Ease Congestion.” Available at: <https://www.npr.org/sections/parallels/2014/10/22/358046982/high-in-the-andes-bolivia-gondolas-in-the-sky-ease-congestion> (accessed September 20, 2023).

¹²⁷ Mexico News Daily. 2022. “Passenger numbers on Mexico City Cablebus line 78% more than expected.” Available at: <https://mexiconewsdaily.com/news/passenger-numbers-on-mexico-city-cablebus-line-78-more-than-expected> (accessed September 20, 2023).

¹²⁸ WBUR. 2017. “An Aerial Tram Is One Mexican City’s Solution To Traffic And Crime.” Available at: <https://www.wbur.org/hereandnow/2017/04/26/mexico-ecatepec-aerial-tram> (accessed September 20, 2023).

¹²⁹ Portland Aerial Tram. Available at: <http://www.gobytram.com> (accessed September 20, 2023).

Appendix F, Memo on Structural Engineering, of the Final EIR, for discussion of how the proposed Project would meet the rigorous safety standards of applicable standards, requirements, and building codes, including all mandated standards addressing environmental factors such as wind and seismic effects and gravity forces, to ensure structural integrity and safety.

In Mexico City, both the Mexicable and Cablebus aerial transit systems transport passengers above dense, residential areas.¹³⁰ In addition to homes and residential neighborhoods, the alignment of Mexicable also covers various nearby schools and educational facilities, servicing students who use the aerial transit system to commute to and from school.¹³¹ In Bogotá, the TransMiCable system is woven seamlessly into the fabric of the densely populated city and surrounding hillside communities. System components, including stations, are nestled among homes and public open space, and public parks have been newly built in close proximity to TransMiCable stations.¹³² In Colombia, MetroCable flies above the densely populated, mountainous city of Medellín. Moreover, as discussed above, it is due to MetroCable's close proximity to residential areas that access to economic opportunities has grown and individual incomes have risen in even the poorest areas of the city.¹³³ In Bolivia, the alignment of Mi Teleférico passes through the densest parts of La Paz and El Alto, flying above countless residences and over public parks.¹³⁴ In Toulouse, Téléo is located alongside a hospital (Rangueil Hospital), a university (Paul Sabatier University), and numerous nearby residences. Indeed, the express purpose of Téléo was to make these sites easily accessible to one another by transit. Likewise, the Burnaby Mountain Gondola would be located nearby a university (Simon Fraser University) and a residential community of 7,000 people, expected to rise to 9,000 people in the coming years.¹³⁵ Like Téléo, the Burnaby Mountain Gondola was conceived to serve the express purpose of providing access to these sites and enable convenient connections between the residences and employers along the system's alignment. Finally, as shown in Table 2-1, ART Precedents, in Section 2.0, Project Description, of the Draft EIR, a reversible tramway operates along a half-mile alignment in New York, New York, connecting Manhattan to Roosevelt Island ("Roosevelt Island Tramway"). The Roosevelt Island Tramway is located in close proximity to numerous residences and is visible from the inside of homes on both ends of the alignment.

Consistent with these precedent systems, the proposed Project would operate safely, efficiently, and in concert with the surrounding urban environment of the City of Los Angeles.

¹³⁰ Leitner. Mexico: A New Chapter in the "Ropeway Success Story." Available at: <https://www.leitner.com/en/company/news/detail/mexico-a-new-chapter-in-the-ropeway-success-story> (accessed September 20, 2023).

¹³¹ ParCitypatory. 2019. "Connecting the Outskirts to City Centre with Cable Cars". Available at: <https://parcitypatory.org/2019/06/08/mexicable> (accessed September 20, 2023).

¹³² International Finance Corporation. 2020. A Cable Car Named Development. Available at: https://www.ifc.org/wps/wcm/connect/news_ext_content/ifc_external_corporate_site/news+and+events/news/cm-stories/bogota-cable-car (accessed September 20, 2023).

¹³³ Mihoko Matsuyuki, et al. 2020. Impact of aerial cable car in low-income area in Medellín, Colombia. Available at: <https://www.sciencedirect.com/science/article/pii/S2352146520305676> (accessed September 20, 2023).

¹³⁴ CleanTechnica. 2014. "The World's Longest Aerial Cable Car System." Available at: <https://cleantechnica.com/2014/10/05/the-worlds-longest-aerial-cable-car-system-bolivia-mi-teleférico> (accessed September 20, 2023).

¹³⁵ Translink. Burnaby Mountain Gondola. Available at: <https://www.translink.ca/plans-and-projects/projects/rapid-transit-projects/burnaby-mountain-gondola> (accessed September 20, 2023).

TOPICAL RESPONSE N

Environmental Justice

Comments on the Draft EIR suggested that the Draft EIR should have addressed environmental justice. Environmental justice ensures equal and equitable protection from environmental and health hazards, meaning that the burdens of pollution should not be borne by sensitive populations or communities that are already experiencing its adverse effects. The Draft EIR addressed topics related to environmental justice, including the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution. The Draft EIR also considered and analyzed the proposed Project's consistency with land use policies related to environmental justice. The proposed Project also supports Metro's goal of prioritizing equity opportunities as demonstrated by the proposed Project's goals which include helping to promote public transit as an essential lever to enabling access and improving quality of life for Los Angeles County. Consistent with the recognition by the California Attorney General that compliance with CEQA itself is a tool to promote environmental justice, the Draft EIR fully analyzed and disclosed the proposed Project's potential environmental effects, including on the surrounding communities.

Environmental Justice and the Draft EIR

Poor and marginalized communities, including communities of color, are disproportionately affected by environmental degradation, with hazardous waste facilities and other polluting industries placed inequitably near these communities. Within the United States, race is the primary determinant of environmental justice, and is recognized by the environmental justice movement as "environmental racism." Communities of color have been battling environmental racism for decades. For example, the practice of "redlining" led to communities of color being located in areas with high levels of pollution and environmental hazards. Projects such as the proposed Project, and other investments that seek to reduce pollution within these communities disproportionately impacted by pollution, are important tools in combating environmental racism. The proposed Project – a zero-emission, high-capacity transit connector – would result in air quality benefits for the surrounding communities and would reduce greenhouse gas (GHG) emissions as a result of reduced vehicular congestion in and around Dodger Stadium and on neighborhood streets, arterial roadways, and freeways, benefitting these communities.

The Draft EIR Addresses Environmental Justice by Considering the proposed Project's Ability to Reduce Congestion and Emissions from On-Road Vehicles in an Area Disproportionately Burdened by Pollution

As the California Attorney General recognizes, environmental justice ensures equal and equitable protection from environmental and health hazards, meaning that the burdens of pollution should not be borne by sensitive populations or communities that are already experiencing its adverse effects.¹³⁶ The California Attorney General's Office acknowledges that compliance with CEQA is a tool to promote environmental justice.¹³⁷ The Draft EIR complied with CEQA, and addressed topics related to environmental justice, including an analysis of the proposed Project's potential impacts to the surrounding

¹³⁶ State of California Department of Justice, Environmental Justice, <https://oag.ca.gov/environment/justice> (accessed September 20, 2023).

¹³⁷ Ibid.

communities, concluding that the proposed Project could result in air quality benefits for the surrounding communities.

As discussed in Section 2.0, Project Description, of the Draft EIR, “the communities in the vicinity of the proposed Project alignment were identified as being in the 90 – 100 percentile of communities disproportionately burdened by multiple sources of pollution in the State.” The proposed Project itself would not exacerbate such burdens, but would provide benefits to these communities. The proposed Project – a zero-emission, high-capacity transit connector – would reduce greenhouse gas (GHG) emissions as a result of reduced vehicular congestion in and around Dodger Stadium and on neighborhood streets, arterial roadways, and freeways, benefitting these communities.

The proposed Project would also result in air quality benefits to communities in the Project area. As discussed in Section 1.4.3, Senate Bill 44, of Section 1.0, Introduction, of the Draft EIR, the lifetime emissions of the proposed Project over its useful life (30 years based on SCAQMD’s guidance for GHG significance thresholds) would be a reduction of 166,653 MT CO₂e. In the same section, the Draft EIR notes that the lifetime VMT reduction of the proposed Project over its useful life would be 129,629,500 VMT. As discussed in Section 3.03, Air Quality, of the Draft EIR, emissions are decreased through reducing vehicle miles traveled, and the “proposed Project would result in a net reduction in criteria pollutant emissions in both 2026 (Build Out) and 2042 (Horizon Year) by reducing vehicle miles traveled and thereby decreasing emissions compared to existing conditions.”

While not applicable to the proposed Project, the proposed Project is consistent with President Biden’s recent Executive Order on Environmental Justice.¹³⁸ The Executive Order provides that “[a]dvancing environmental justice will require investing in and supporting culturally vibrant, sustainable, and resilient communities in which every person has safe, clean, and affordable options for housing, energy, and transportation.” The proposed Project is a proven, zero emission, safe, sustainable, high-capacity and highly efficient form of transportation that would function as both a reliable rapid transit system and first/last mile¹³⁹ connector. The Executive Order also requires agencies to provide information in a manner that provides meaningful access to individuals with limited English proficiency and is accessible to individuals with disabilities, and to provide technical assistance, tools, and resources to assist in facilitating meaningful and informed public participation. As discussed in detail below, the proposed Project provided project information and outreach in multiple languages reflective of the communities in the Project area, provided ADA accessibility features in public meetings, and hosted eight public meetings immediately preceding, during, and immediately following the Draft EIR public review period to facilitate meaningful and informed public participation. In addition, in June 2021, the Project Sponsor also hosted virtual community meetings to provide Project updates and solicit feedback on the proposed Project, and provided information in various languages.

¹³⁸ The White House, Executive Order on Revitalizing Our Nation’s Commitment to Environmental Justice for All (April 21, 2023), available at: <https://www.whitehouse.gov/briefing-room/presidential-actions/2023/04/21/executive-order-on-revitalizing-our-nations-commitment-to-environmental-justice-for-all> (accessed September 20, 2023).

¹³⁹ Metro’s First/Last Mile Policy is aimed at making it easier to travel in Los Angeles by strengthening connections between transit stations and their surrounding communities. <https://www.metro.net/about/first-last> (accessed September 20, 2023).

The Draft EIR Analyzed the Proposed Project’s Consistency with General Plan Policies Related to Environmental Justice

While the City of Los Angeles has not adopted a separate Environmental Justice Element, the City’s General Plan Framework Element establishes several health-promoting principles, including equity and environmental justice in such considerations. Similarly, the City’s Mobility Element has a strong public health focus centered around promoting sustainability and increasing access to active transportation. As provided in Table 3.11-3, Project Consistency with Applicable City of Los Angeles General Plan Policies, of the Draft EIR, the Draft EIR analyzed the proposed Project’s consistency with these policies. For example, as discussed in Section 3.11, Land Use and Planning, of the Draft EIR, the proposed Project supports Framework Element Objective 5.8 by reinforcing or encouraging the establishment of strong pedestrian orientation in the surrounding communities and facilitating multi-modal access to and from the stations with pedestrian network improvements. Consistent with this objective, the Draft EIR notes how “[t]he proposed Project would also enhance community connectivity to areas that have historically been underserved and provide pedestrian enhancements so that the areas surrounding the stations can serve as a focus of activity for the surrounding community and a focus of investment in the community.” Section 3.11, Land Use and Planning, of the Draft EIR, discusses how the proposed Project is consistent with Framework Element Policy 38, seeking to enhance neighborhood accessibility by “provid[ing] new connections to and between currently underserved neighborhoods and uses along the proposed alignment” while including a “mobility hub at the Chinatown/State Park Station where passengers would be able to access a suite of first mile and last mile multi-modal options, such as a bike share program.” In addition to facilitating a potential bike share program, the proposed Project’s cabins would accommodate bicycles, as described in Section 2.0, Project Description, of the Draft EIR. Further, the Chinatown/State Park Station location may provide bicycle access from the adjacent proposed Los Angeles River bicycle path (anticipated to open in 2027)¹⁴⁰ to the bicycle and hiking trails in Elysian Park.

The Draft EIR also analyzed the proposed Project’s consistency with the City’s Mobility Element in Section 3.17, Transportation. The proposed Project would ensure quality pedestrian access by facilitating “multi-modal access to and from the stations with pedestrian network improvements.” Such improvements would be targeted especially at the areas surrounding the proposed Dodger Stadium Station to provide a safe and efficient connection for pedestrians traveling between the station and the stadium. The proposed Project would also provide quality pedestrian access to communities surrounding Dodger Stadium further advancing the environmental justice goals of the City’s Mobility Element. A key policy initiative of the City’s Mobility Element is to “embed equity and environmental justice into the transportation policy framework, project implementation, and action programs.”¹⁴¹ Because the proposed Project would bring quality pedestrian access to areas around Dodger Stadium that previously have lacked such access, the Draft EIR concluded that the proposed Project would be consistent with the policies of the City’s Mobility Element to ensure the provision of quality pedestrian access.

¹⁴⁰ Los Angeles County Metropolitan Transportation Authority, LA River Path Project, <https://www.metro.net/projects/lariverpath> (accessed September 20, 2023).

¹⁴¹ Los Angeles Department of City Planning, Mobility Plan 2035, p. 14 (2016), https://planning.lacity.org/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf#page=14 (accessed September 20, 2023).

The Proposed Project Supports Metro’s Goal of Prioritizing Equity Opportunities

The proposed Project would be consistent with Metro’s equity goals. Metro’s Rapid Equity Assessment (“REA”) is a tool designed to assist Metro staff in identifying and prioritizing equity opportunities. Metro’s REA was developed in June 2020 to consider equity in urgent times, and assists Metro staff in quickly prioritizing equity opportunities, which enhance positive impacts or reduce negative consequences, and is used as a first step for Metro projects, programs, services, and decisions. Metro defines “equity” as “both an outcome and a process to address racial, socioeconomic, and gender disparities, to ensure fair and just access . . . to opportunities, including jobs, housing, education, mobility options, and healthier communities . . . [i]t requires community information and needs-based provisions, implementation, and impact of services, programs, and policies that reduce and ultimately prevent disparities.”¹⁴²

Consistent with Metro’s Rapid Equity Assessment framework, the proposed Project seeks to support Metro’s goal of prioritizing equity opportunities and will help promote public transit as an essential lever in enabling access to safe and sustainable transportation and improving quality of life for Los Angeles County.

Potential Benefits and Improving Equity Outcomes

Improved Transportation Connectivity in Metro’s EFCs

The proposed Project would improve transportation connectivity in Metro’s Equity Focused Communities (EFCs) where transportation needs are greatest.

Metro created a community designation called Equity Focus Communities (EFCs) to help identify where transportation needs are greatest. The proposed Project, which is located within the boundaries of Metro’s EFCs, would help to improve transportation in EFCs. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project aims to enhance community connectivity in these EFCs by providing first/last mile transit and pedestrian access in areas that have historically been underserved, including Los Angeles State Historic Park and Elysian Park. The proposed Project is also consistent with Metro’s First/Last Mile Strategic Plan to facilitate easy, safe, and efficient access to the regional transportation system because it would increase connectivity of people in the EFCs to the region’s public transportation hub at LAUS and the Dodger Stadium property, and more broadly improve mobility and accessibility for the region by providing a daily, high capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. In addition to facilitating transit connectivity, the proposed Project would also enhance access for riders of the ART system to parks, including Los Angeles State Historic Park and Elysian Park, thereby improving equitable access to parks. Metro also acknowledges that there is a need for improved transit options that link with the growing Metro network to meet existing and future travel demands and access to Dodger Stadium.

Therefore, as discussed in Section 2.3.8, Project Objectives, of the Draft EIR, the overall purpose of the proposed Project is to provide a direct transit connection between LAUS and the Dodger Stadium property via an aerial gondola system and improve connectivity for the surrounding communities by linking to the

¹⁴² Metro’s Rapid Equity Assessment (REA), available here:

<https://www.dropbox.com/s/790jw2sumk42ra6/Rapid%20Equity%20Assessment%20Tool.pdf?dl=0> (accessed September 20, 2023).

Los Angeles State Historic Park, Elysian Park, and the neighborhoods along the proposed Project alignment and the region's rapidly growing regional transit system at LAUS.

Air Quality Benefits

The proposed Project would also reduce vehicular congestion in and around Dodger Stadium, thereby reducing VMT and GHG emissions and resulting in air quality benefits.

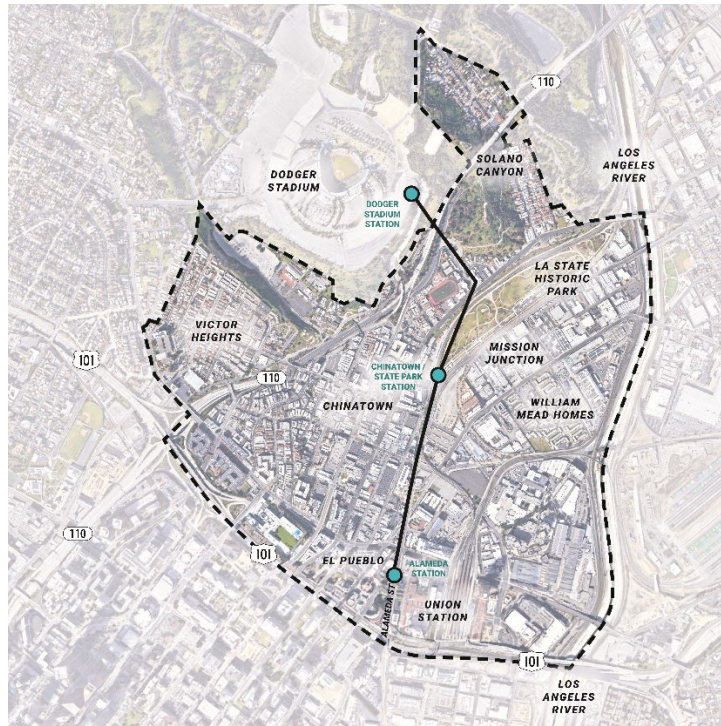
The proposed Project seeks to take into account the current needs of the surrounding community, including economic barriers and social challenges with access to transit by helping to reduce vehicular congestion and associated air pollution in the Project area. As discussed in Section 2.0, Project Description, of the Draft EIR, the communities in the vicinity of the proposed Project alignment were identified as being in the 90 – 100 percentile of communities disproportionately burdened by multiple sources of pollution in the state.¹⁴³ And, as the region's population grows and resulting travel needs continue to increase, the local and regional roadway system is likely to experience greater congestion. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue, unlike other high-capacity venues in the region. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. The lifetime emissions of the proposed Project over its useful life would be a reduction of 166,653 MT CO₂e. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. Emissions are decreased through reducing vehicle miles traveled. The proposed Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles traveled.

Affordability – Community Access Plan

As reflected in the Project Objectives provided in Section 2.3.8 of the Draft EIR, the proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, providing connections to Metro's growing regional public transit system. Some communities along the proposed Project alignment, including William Mead Homes, include families with a median household income of <\$20,000 per year. To enhance access to the proposed Project for these communities, in addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The graphic below demonstrates the geographic area for the Community Access Plan applicability. Moreover, under the Community Access

¹⁴³ California Office of Environmental Health Hazard Assessment, CalEnviroScreen 4.0 Map, <http://oehha.ca.gov/calenviroscreen/maps-data>.

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



Accessibility – ADA Compliance

To ensure the proposed Project overcomes barriers to access due to physical inability, the proposed Project is designed to be ADA compliant. As discussed in Section 2.0, Project Description, of the Draft EIR, the station boarding process and cabins would allow for sitting or standing, and would comply with all accessibility requirements of the Americans with Disabilities Act ("ADA"), including accommodating wheelchairs. In addition, the length and sizing of the arrival/departure platforms within station would be compliant with the accessibility requirements of the ADA. If needed, cabins could be either slowed or stopped in the station for boarding purposes. Station attendants would be located within each station to assure safe boarding and to execute stops for unloading or boarding purposes, if necessary. Attendants would also provide customer interaction and observation; if a passenger needs special assistance, an attendant may either further slow, or stop, a cabin. A separate operator would be stationed in a control booth monitoring screens, which would show activities in each cabin and station, as well as the system controls. The time necessary to slow or stop cabins is factored into the overall of system capacity of the proposed Project. Pathways to and from the boarding areas would be ADA compliant with redundant vertical circulation and appropriately sized passageways. The entry widths and interiors size of each cabin would comply with the requirements of the ADA.

Open Space Enhancements, Active Transportation Connectivity, and Sustainability Features

The proposed Project also includes features to enhance and provide additional benefits to the surrounding communities. The proposed Project would include several sustainability features and open space enhancements, including pedestrian enhancements, drought tolerant landscaping, and improvements at the Alameda Triangle, the Los Angeles State Historic Park, and along the pedestrian pathway connecting Dodger Stadium Station and Dodger Stadium. The proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first- and last-mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. The proposed Project would also improve transit access to the Los Angeles State Historic Park and Elysian Park.

Safety and Security Features

As discussed in detail in Topical Response M, Comparable Urban Aerial Transit Systems, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with their surrounding environments. For example, in Mexico City, both the Mexicable and Cablebus aerial transit systems transport passengers above dense, residential areas.¹⁴⁴ In addition to homes and residential neighborhoods, the alignment of Mexicable also covers various nearby schools and educational facilities, servicing students who use the aerial transit system to commute to and from school.¹⁴⁵ Further, residents of cities with aerial transit systems have reported a greater sense of security when riding aerial transit relative to other modes of public transportation. Regular passengers of the Cablebus in Mexico City have reported that despite high incidents of theft in public transportation, they experience a greater sense of security when riding the Cablebus and thus prefer it to other transit modes.¹⁴⁶ And in Ecatepec, residents have expressed similar preferences to taking Mexicable over buses given how frequently bus passengers become victim to crime in the area.¹⁴⁷

In line with such comparable systems, and as discussed in Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, system components would be equipped with security features for system safety. The gates and entrances to the stations would be locked at night and would be equipped with security features to prevent entrance by unauthorized personnel. The towers would have no publicly accessible gates or entrances and would be inaccessible to unauthorized personnel. Maintenance doors at the base of the towers would be secured at all times and only accessible by authorized personnel. The system components would be equipped with security cameras to monitor activity at stations, the junction, the towers, and in each cabin. Moreover, attendants would be present at each station, and a separate operator would be stationed in a control room to monitor activity throughout the proposed Project.

¹⁴⁴ Leitner, Mexico: A New Chapter in the “Ropeway Success Story.” available at: <https://www.leitner.com/en/company/news/detail/mexico-a-new-chapter-in-the-ropeway-success-story> (accessed September 20, 2023).

¹⁴⁵ ParCitypatory, Connecting the Outskirts to City Centre with Cable Cars (2019), available at: <https://parcitypatory.org/2019/06/08/mexicable> (accessed September 20, 2023).

¹⁴⁶ Mexico News Daily, Passenger numbers on Mexico City Cablebus line 78% more than expected (June 21, 2022), <https://mexiconewsdaily.com/news/passenger-numbers-on-mexico-city-cablebus-line-78-more-than-expected> (accessed September 20, 2023).

¹⁴⁷ WBUR, An Aerial Tram Is One Mexican City’s Solution To Traffic And Crime, (April 26, 2017), <https://www.wbur.org/hereandnow/2017/04/26/mexico-ecatepec-aerial-tram> (accessed September 20, 2023).

In addition, and as discussed in Topical Response K, Signage and Lighting, the proposed Project would include signage to support wayfinding for transit passengers, including information about transit connections and other important information to facilitate transit usage, and the proposed Project's lighting would include low-level lighting for security and wayfinding purposes.

Project Sponsor's Commitment to Utilizing MBE/WBE/DBE/SBE/DVBE/LGBTQ Owned Businesses¹⁴⁸

The Project Sponsor has committed to a goal of 35 percent utilization of MBEs, WBEs, DBEs, SBEs, DVBEs, and LGBTQ-owned businesses during the proposed Project's construction phase.

Utilization of Local Artists to Reflect the Unique Neighborhood Culture and History

As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, each station of the proposed Project could provide an opportunity for site-specific artwork commissioned from artists from the surrounding community, that is reflective of the unique neighborhood culture. The proposed Project has also committed to one "Art Cabin" that could feature artwork commissioned from local artists. The proposed Project would create numerous opportunities to collaborate with and showcase local artists, including convening stakeholder groups to coordinate on issues including utilization of local artists and identification of sites along the proposed Project alignment to showcase the work of local artists.

Overcoming Potential Burdens

The Proposed Project Would Not Displace Businesses

Comments on the Draft EIR address the need for housing, grocery stores, and/or healthcare facilities in the communities in the vicinity of the proposed Project alignment. The proposed Project would not preclude the development of such uses. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses along the proposed Project alignment while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors including Dodgers fans, and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. As discussed in Topical Response C, Project Features, during construction of the proposed Project, the Project Sponsor would create a Business and Community Support Program to assist local businesses affected by proposed Project construction activities. The proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including MBEs, WBEs, DBEs, SBEs, DVBE, and LGBTQ-owned businesses, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. Further, as discussed in Section 3.17, Transportation, and Section 3.11, Land Use, of the Draft EIR, multimodal access—for both local and emergency response—to local businesses, neighborhoods,

¹⁴⁸ MBE/WBE/DBE/SBE/DVBE/LGBTQ refers to minority business enterprises (MBE), women business enterprises (WBE), disadvantaged business enterprises (DBE), small business enterprise (SBE), disabled veteran business enterprises (DVBE), and LGBTQ-owned businesses.

LAUS, and the Los Angeles State Historic Park would be maintained throughout construction of the proposed Project, and disruptions to local businesses would be minimized.

The Proposed Project Would Not Displace Housing

As discussed in Section 3.14, Population and Housing, of the Draft EIR, and Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, of the Final EIR, no displacement of existing residences or housing would occur in connection with the construction and operation of the proposed Project, which would operate primarily over the public ROW and publicly owned property to minimize aerial rights requirements over private properties, taking into account existing and future adjacent land uses. The proposed Project is intended to accommodate existing and future transportation needs of the area's population. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, of the Final EIR, for an overview of the proposed Project's consistency with planned and proposed housing in the vicinity of the proposed Project. The proposed Project would therefore not preclude the development of such community-facing uses within the area.

Minimizing Aerial Rights Requirements

As discussed in Section 2.5, Proposed Project Alignment and Components, of Section 2.0, Project Description, of the Draft EIR, and illustrated in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR, the proposed Project was chosen as it maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties, taking into account existing and future adjacent land uses.

Addressing Privacy Concerns

Some commenters raise concerns about impacts to privacy of communities along the proposed Project alignment. As discussed in Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizontal distance between the proposed Project cabins and the adjacent sensitive views.

Community Outreach and Engagement Efforts

Metro and the Project Sponsor have conducted extensive community engagement efforts. As discussed in Appendix A, Scoping Report, of the Draft EIR and Appendix A, Public Outreach Report, of the Final EIR, these efforts include multilingual door knocking, provision of project materials and information in multiple languages, numerous public meetings with provision of materials and interpretation in multiple languages, and partnerships with various cultural, educational, and business community organizations, including Cathedral High School, the Chinese American Museum, the Italian American Museum, Chinatown businesses, and Olvera Street Merchants. Community engagement efforts also resulted in understanding the desire for projects that help promote business in the area, and to help alleviate concerns that community members had regarding traffic and parking. For example, although parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"), a Parking

Study was prepared to provide additional information to the community and decision makers about existing parking conditions and the proposed Project's potential to effect parking conditions around the Alameda Station and Chinatown/State Park Station. As recommended in the Parking Study, the Project Sponsor will prepare, in collaboration with the City, and with robust feedback from community stakeholders, a parking management plan. The City would implement any on-street parking management strategies identified. In addition, as discussed in Section 5.0, Other CEQA Considerations, of the Draft EIR, these community engagement efforts led to stakeholder feedback that also helped inform the location for the proposed Project's Alameda Station and Chinatown/State Park Station. These locations were chosen, in part, to help direct increased foot traffic to nearby businesses and provide safe and convenience pedestrian connections to adjacent uses.

The proposed Project's outreach efforts are intended to support Metro's equity goals, including addressing parking and traffic concerns during game and event days, reducing vehicle miles traveled, and increasing transit access for underserved communities by allowing local residents and employees of businesses in the proposed Project vicinity to ride the proposed Project and transfer to/from the regional Metro transit system using their Metro system access pass at no additional cost, through the Community Access Plan.

Public outreach for the proposed Project was designed with environmental justice principles in mind – ensuring that people have fair and equal access to the planning process regardless of race, culture, national origin, disability status, or income. Public outreach was also designed to ensure compatibility with Metro's equity goals by providing community members the ability to meaningfully engage with information about the proposed Project and ask questions and provide public comments in their native languages. This ensures Metro can intentionally collaborate and listen to community experiences from all community members by removing barriers to communication and accessibility.

As discussed in Appendix A, Public Outreach Report, of the Final EIR, eight public meetings were held immediately preceding, during, and immediately following the Draft EIR public review period, with four held in-person in the Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar which included toll-free dial in options and ADA accessibility features. To reflect the surrounding community, Project materials and information were provided at both the in-person meetings and on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during the eight public meetings, with interpretation provided in Taishanese during the final two public meetings.

TOPICAL RESPONSE O**Response to UCLA Mobility Lab Study**

Comments on the Draft EIR attached and/or referred to an analysis conducted by the UCLA Mobility Lab and issued in October 2022, which the Mobility Lab’s director referenced as “preliminary in nature” (the Mobility Lab Study).¹⁴⁹ This Topical responds to the Mobility Lab Study.

The Mobility Lab Study was issued through what appears to be a press release and does not provide supporting documentation. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the proposed Project’s Draft EIR and does not appear to have been prepared for that purpose. On January 13, 2023, the Mobility Lab issued the following statement regarding the Mobility Lab Study:^{150,151}

Statement from the UCLA Mobility Lab Regarding LA Gondola Ridership Projection

The UCLA Mobility Lab is an engineering and technology lab dedicated to scientific research and innovation around mobility technologies. The lab’s data on projected transit ridership of a proposed Dodger Stadium gondola is preliminary in nature. More research would be necessary to draw conclusions about potential use of the gondola. The lab takes no view on whether the project should be built.

Jiaqi Ma

Director, UCLA Mobility Lab

Faculty Associate Director, UCLA Institute of Transportation Studies

Responses to Items in Mobility Lab Study

Comment ML-1 UCLA Mobility Lab
Study Finds Proposed Aerial Gondola to Dodger Stadium Will Do Little to Reduce Traffic and Emissions

October 24, 2022

University of California Los Angeles

Executive Summary

Los Angeles Aerial Rapid Transit (LA ART), a subsidiary of former Dodgers owner Frank McCourt’s company McCourt Global, wants to build an aerial gondola to take people from Union Station to Dodger Stadium. Promoters of the gondola claim that it will take 3,000 polluting cars off neighborhood streets and the 110 freeway before and after Dodger games, leading to a net reduction in greenhouse gas emissions.

Transportation researchers from the University of California, Los Angeles (UCLA) examined these claims using a state-of-the-art transportation simulation model and

¹⁴⁹ UCLA Mobility Lab, Study Finds Proposed Aerial Gondola to Dodger Stadium Will Do Little to Reduce Traffic and Emissions, October 24, 2022.

¹⁵⁰ UCLA Mobility Lab. 2023. Statement from the UCLA Mobility Lab Regarding LA Gondola Ridership Projection. January 13, 2023. <https://mobility-lab.seas.ucla.edu> (accessed September 20, 2023).

¹⁵¹ UCLA Mobility Lab. 2023. Tweet on January 13, 2023. https://twitter.com/ucla_its/status/1613998706851971075?s=46&t=p_Kv02sYuM0ssXk0RDXWeA (accessed September 20, 2023).

found that the gondola could reduce traffic on major roads around Dodger Stadium on the night of a sold-out game, but the impact would likely be very limited. They found that the gondola likely would take only around 608 cars off the road. The gondola is thus unlikely to significantly reduce greenhouse gas emissions and traffic overall.

Response ML-1 This comment provides a general summary of the items discussed in the Mobility Lab Study. Responses to the Mobility Lab Study are provided below. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for an overview of the proposed Project's sponsor, Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation emissions such as the proposed Project.

Comment ML-2 Methodology

The UCLA researchers – led by Dr. Brian Yueshuai He and Dr. Jiaqi Ma in the UCLA Mobility Lab at the UCLA Samueli School of Engineering – used the “LA Sim” model they created based on activity-based travel demand and agent-based simulation models. The model is grounded in the theory of “discrete choice,” for which Daniel F. McFadden won a Nobel Prize in economics in 2000. Based on real data about road network, traffic, public transportation, and other modes of moving around the city, including walking and bicycling, LA Sim simulates the individual choices that millions of travelers will make when something changes, such as adding another form of transportation, like a gondola to the Los Angeles transportation network.

The researchers caution that this simulation only models the probable use of the gondola for a sold-out night game and further research could reveal different scenarios for a day game or double-header, for example. But the research does model the most likely scenario for fans to choose the gondola – when traffic around the stadium is likely to be most heavy. Around 85% of baseball games played at Dodger Stadium are night games, starting at 7:10pm.

Response ML-2 The Mobility Lab Study states that it used the “LA Sim” model grounded in the theory of “discrete choice” and based on real data about travel systems and behavior in the City. The transportation analysis conducted by Fehr & Peers for the Draft EIR also utilized a transportation model grounded in the theory of “discrete choice,” which forms the theoretical basis for nearly all transportation forecasting, and also based on real data about travel networks and travel behavior in the City, including specific details for the proposed Project alignment. As detailed in Section 3.17, Transportation and the Ridership Model Development Memorandum in Appendix N, Transportation Appendices, of the Draft EIR, the transportation model utilized for the transportation analysis for the Draft EIR for game day travel was a customized ridership model developed because standard regional travel demand models do not accurately represent special generators such as Dodger Stadium and do not include specialized transit modes such as the proposed Project.

Mobility Lab’s “LA Sim” model was derived from the Southern California Association of Government’s 2016 regional travel demand model for the Southern California region.¹⁵² A close inspection of Figure 1 of the Mobility Lab’s Study shows that the model does not have the detailed roadway network in the vicinity of Dodger Stadium (for example, it does not include Stadium Way, Vin Scully Avenue, Chavez Ravine Place, College Street, Bishops Road, the SR-110 ramps to/from the Dodger Stadium Downtown Gate, and the Dodger Stadium gates themselves). It may also lack the background growth factors contained in the City of Los Angeles model for the land use in the study area, as the City of Los Angeles model has the most up to date forecasts based on updates to the relevant community plans in the study area. In the Draft EIR, non-game day travel was estimated using growth factors calculated from the City of Los Angeles’ citywide travel demand model. The City of Los Angeles model is derived from the Southern California Association of Government’s regional travel demand model for the Southern California region, but with additional roadway network detail and the latest land use growth forecasts in the study area, making this model more appropriate for local area analyses.

In contrast to the Mobility Lab’s review, the Draft EIR analysis uses the customized ridership model that more accurately reflects conditions in the vicinity of Dodger Stadium. The ridership model was developed and validated to Los Angeles conditions as documented in the Ridership Model Development Memorandum, in Appendix N, Transportation Appendices, of the Draft EIR. Data specific to Dodger Stadium was utilized to develop the customized ridership model, which included Dodger Stadium attendance and Dodger Stadium Express ridership for all regular season home games in the 2019 Dodger season, zip codes of Dodger game ticket buyers, and Dodger Stadium parking costs. The customized ridership model estimated and compared driving travel times and costs to transit travel times and costs from each zip code to and from Dodger Stadium. By doing so, the ridership model for the proposed Project is a more accurate model of game and event-related travel to and from Dodger Stadium than a more generalized regional travel demand model such as the “LA Sim” model used in the Mobility Lab Study.

Given that different models were used by the Mobility Lab and in the Draft EIR, it is not surprising that results of the modeling would differ. However, the customization of the ridership modeling conducted for the proposed Project ridership model to local conditions and the use of actual data regarding Dodger Stadium fan travel patterns while developing the proposed Project ridership model (as described in the Ridership Model Development Memorandum, in Appendix N, Transportation Appendices, of the Draft EIR) render the modeling and ridership projections in the Draft EIR more complete and accurate and appropriate for use for the proposed Project.

Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and the Ridership Model

¹⁵² Accessed 5/30/2023 from <https://mobility-lab.seas.ucla.edu/research/modeling-and-control-of-dynamic-complex-systems-in-smart-cities>.

Development Memorandum in Appendix N, Transportation Appendices, of the Draft EIR.¹⁵³ Stantec is an internationally-respected global design and delivery firm that provides transportation engineering and planning services among its many service lines. Stantec concluded that the proposed Project ridership forecasting model and the model inputs and data sources were credible, defensible, and appropriate to use for the analysis and that they agreed with the ridership forecasts in the Draft EIR.¹⁵⁴

While the documentation of Mobility Lab's analysis indicates that it is for a sold-out weekday evening, the Dodgers have drawn the most attendance in major league baseball for many years. In the 2019 season, which serves as the baseline year for many of the data inputs used in the ridership analysis, the Dodgers set an annual paid attendance record of 3,974,309, including 28 sellout games out of an 81 game regular season.¹⁵⁵ Congestion around Dodger Stadium is a regular occurrence for nearly every game, with sell outs or near sell outs reflecting a typical peak condition, not an occasional peak condition. Thus, high ridership levels would be expected throughout the season.

Comment ML-3 Findings

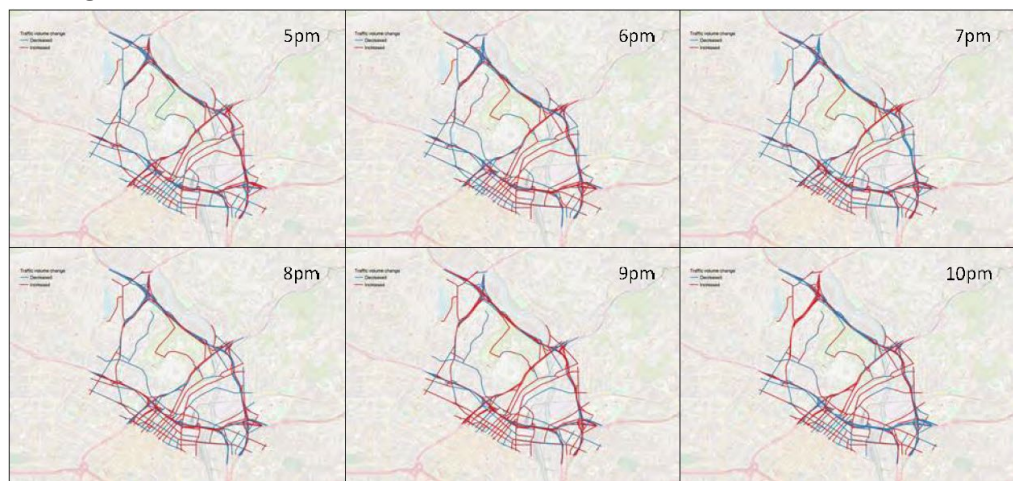


Figure 1: Traffic simulation results by the hour

- Contrary to claims from LA ART, researchers found that the gondola would not significantly reduce traffic around Dodger Stadium.** Results showed the gondola would likely slightly reduce traffic on some roads around the stadium for a sold-out night game and increase traffic on others, leading to little reduction in greenhouse gas emissions. The red lines in Figure 1 above indicate road segments that have a higher traffic volume after the proposed gondola is added to the traffic simulation. The blue lines indicate a decrease in traffic volume. According to the simulation, the total traffic volume would likely be reduced by around 0.9%

¹⁵³ Memo to Holly Rockwell, LA Metro, from Maria Morris and Daryl Zerfass, Stantec, dated March 3, 2023 regarding *Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review*.

¹⁵⁴ Stantec Memorandum to Metro re: LA ART Transportation Analysis Peer Review (March 3, 2023).

¹⁵⁵ Accessed 5/25/23 from: <https://dodgerblue.com/dodgers-franchise-record-dodger-stadium-attendance/2019/09/23/>.

(less than 1%) on the roads surrounding the stadium if the proposed gondola is built.

Response ML-3

The graphic presented in Figure 1 of the Mobility Lab Study illustrates preliminary traffic simulation results from the Mobility Lab's model for the highway system in the vicinity of Dodger Stadium. The transportation model roadway network shown in Figure 1, however, shows that the Mobility Lab Study and model network is missing many of the critical roadways that link to Dodger Stadium (including Stadium Way, Vin Scully Avenue, Chavez Ravine Place, College Street, Bishops Road, the SR-110 ramps to/from the Dodger Stadium Downtown Gate, and the Dodger Stadium gates themselves). This is typical for regional travel demand models designed for analysis of the regional transportation system, which by design do not include smaller subregional streets or event venues. However, the missing streets play an important role in access to/from the stadium. A more sophisticated localized analysis of traffic increases and decreases in the vicinity of Dodger Stadium should include customization of the model's highway network to include an increased granularity of detail for the streets serving the stadium, as this network has a profound effect on congestion in the neighborhoods surrounding the stadium. The lack of roadway network customization in the Mobility Lab Study model to include the key roadways serving Dodger Stadium underreports the benefits of trip reductions around Dodger Stadium, because the roadways that access the Stadium are those where the full benefit of the proposed Project would be experienced. The omissions of these roadways from the Mobility Lab Study model renders any estimation of traffic reductions and/or increases to be incomplete and aligns with the Mobility Lab's own statement that their forecast for the proposed Project should be considered preliminary.

It should also be noted that the LA Sim model's estimate of traffic volume increases on roadway links are not associated with either the proposed Project or Dodger Stadium, as the Mobility Lab's documentation indicates that riders driving to proposed Project stations were not modeled. Instead, the model is responding to the reduction in cars traveling to and from Dodger Stadium as attendees ride the proposed Project, by shifting vehicles from parallel routes or from other time periods, and communities that use those streets can now travel more easily during pre- and post-game time periods due to reductions in vehicle trips destined to Dodger Stadium as a result of the proposed Project. This would not mean that the proposed Project is ineffective in reducing vehicle miles traveled and greenhouse gas emissions since the community trips are already on the system and do not represent increases in trips, but rather vehicle trips that shift from adjacent corridors or shift in time periods of travel, thereby increasing local access and local vehicle travel opportunities for the community.

Comment ML-4

- **It's unlikely the gondola would contribute to a significant net decrease in greenhouse gas emissions.** Approximately 608 cars would be taken off the road,

not nearly close to the 3,000 LA ART claims. Most of the people who choose the gondola in the simulation – 4,470 – board the gondola at Union Station, with another 220 passengers boarding at a station proposed to be located at Los Angeles State Historic Park near Chinatown. With only 4,690 people taking the gondola in total and of those 2,500 estimated to be regular users of the Dodger Stadium Express clean energy buses there would only be 2,190 new people taking public transportation to the game using the gondola. The average car parking at the stadium carries 3.6 people, which means that the approximate number of cars taken off the road would be around 608. The simulation only models the number of passengers connecting the gondola via public transportation, on foot or by bike. It does not model people who would drive to Union Station or Chinatown to take the gondola. However, people who drive to those stations to take the gondola would not contribute to a net reduction in traffic or greenhouse gas emissions.

Response ML-4 As discussed on page 3.17-34 and shown in Table 3.17-4 in Section 17, Transportation, of the Draft EIR, the Draft EIR estimates that 6,000 game or event attendees would ride the proposed Project to a game or event in Dodger Stadium in 2026. This total includes those who would access the proposed Project via bus transit, rail transit, private automobile, rideshare, bicycle, and walk. Of these, the Draft EIR estimates that 4,050 of the 6,000 riders in 2026 would arrive via transit/walk/bike, based on the estimated non-auto mode of access of 67.5 percent, as detailed in Appendix N, Transportation Appendices, of the Draft EIR. The Mobility Lab Study states that its simulation only models passengers connecting to the proposed Project via transit, bicycle, or walking, but does not model riders driving to access the proposed Project and estimates that 4,690 riders would ride the gondola in its simulation. This is a key distinction between the Mobility Lab Study and the ridership estimates in the Draft EIR: the Mobility Lab Study estimate of 4,690 proposed Project riders arriving via transit/walk/bike is actually higher than the number of riders in the Draft EIR that are projected to connect to the proposed Project via transit/walk/bike because it excludes park-and-ride and rideshare modes of access. The corresponding number from the Draft EIR is 4,050 of the estimated 6,000 riders in 2026 arriving via transit/walk/bike, based on the estimated non-auto mode of access of 67.5 percent, as detailed in Appendix N. Thus, the ridership projections in the Draft EIR are actually more conservative than those in the Mobility Lab Study as to the assumption of riders arriving via transit/walk/bike.

As stated on page 3.17-27, in Section 3.17, Transportation, of the Draft EIR, based on data from the 2019 regular season with an average game attendance of 48,650, the average Dodger Stadium Express ridership was 2,260 per game, with 1,845 per game for the Union Station route and 415 from the South Bay routes. The Mobility Lab Study incorrectly states that there are 2,500 estimated regular users of the Dodger Stadium Express. The overestimation of the Dodger Stadium Express ridership in the Mobility Lab Study underestimates the net benefit of the proposed Project.

The Dodger Stadium Express would not be precluded from operating by the proposed Project. While existing riders of the Union Station Dodger Stadium Express may choose to switch to the proposed Project to take advantage of its substantial travel time savings, some riders may prefer to ride the Union Station Dodger Stadium Express for other reasons (for example, if individuals have a fear of heights). Independent of the Dodger Stadium Express, the opportunities for more mobility choices through improved connections to additional public transit options created by the proposed Project are projected to increase the number of game attendees to ride public transportation. As noted above, the Mobility Lab Study underestimates proposed Project riders and overestimates the existing Dodger Stadium Express ridership, thereby underestimating the proposed Project benefits.

The Mobility Lab Study states that 608 cars would be taken off of the road, apparently based on its estimate of 2,190 new people taking transit to Dodger Stadium divided by an assumed average vehicle occupancy (AVO) of 3.6. The Draft EIR does not analyze “cars taken off the road” as it is not a CEQA transportation-related metric. The Draft EIR instead analyzes vehicle miles traveled (VMT), which is the required CEQA transportation impact metric. The estimate of the equivalent of up to 3,000 cars taken off the road quoted in the comment is not generated or used in the Draft EIR and is apparently an estimated reduction in vehicles parking at Dodger Stadium at year 2042 based on the forecast ridership of 10,000 riders per game (approximately 20 percent of total game attendees). It is not an assertion about overall vehicle reduction once those who are estimated to drive to access a proposed Project is factored in.

Given that the potential for proposed Project riders to drive to access the proposed Project is important, and some riders drive and park to access the Dodger Stadium Express today, it is not clear why the Mobility Lab model does not consider the additional riders who would drive to park in off-street parking lots near the Alameda Station or Chinatown/State Park Station to ride the proposed Project. Automobile mode of access to the proposed Project is in fact modeled in the Draft EIR, and taken into account in the VMT estimates. As detailed in the Draft EIR, the proposed Project is forecast to reduce annual VMT by 2,434,000 in the Project’s first operational year in 2026, increasing as ridership increases to an annual VMT reduction of 5,067,000 in 2042, even with automobile mode of access to the proposed Project taken into consideration. Based on an interpolation for the years between 2026 and 2042, and holding the reduction constant after 2042 until 2056, the lifetime VMT reduced by the proposed Project over its useful life (30 years based on SCAQMD’s guidance for GHG significance thresholds) would be a reduction of 129,629,500 VMT. The proposed Project would reduce GHG emissions by 3,493 metric tons of carbon dioxide equivalent per year (MT CO₂e/year) in the buildout year of 2026 and by 6,277 MT CO₂e/year in the horizon year of 2042. Based on an interpolation for the years between 2026 and 2042, and holding the reduction constant after 2042 until 2056, the lifetime emissions of the proposed Project over its useful life (30 years based on

SCAQMD’s guidance for GHG significance thresholds) would be a reduction of 166,653 MT CO₂e of GHGs.

Comment ML-5

- **The gondola would carry fewer passengers than LA ART has claimed.** LA ART originally claimed that the gondola could carry up to 5,000 passengers per hour on game days. Researchers found that the gondola is likely to carry fewer than a total of 5,000 passengers to Dodger Stadium – 4,690 according to the simulation – even when the service is provided free with a game ticket for a sold-out night game like the playoffs. In a recent parking study, LA ART revised their claim, estimating that 6,000 would ride the gondola to games by 2026, with 4,350 arriving to the gondola via public transportation. The project’s Draft Environmental Impact Report contains the same estimate, which corroborates the UCLA estimate of ridership if the gondola were in operation today.

Response ML-5

As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would carry up to approximately 5,000 people per hour per direction (pphpd) based on the system’s design capacity. Within two hours prior to the start of a game or event at Dodger Stadium, more than 10,000 people could be transported to the Stadium via the proposed Project. Given the capacity of this system, approximately 20 percent of the fans could take the proposed Project. As discussed in Section 3.17, Transportation, of the Draft EIR, the ridership model estimated that 6,000 passengers would ride the proposed Project in 2026 and 10,000 passengers would ride the proposed Project in 2042. The proposed Project did not revise the ridership; 5,000 refers to the capacity of the proposed Project per hour per direction, summarized as 5,000 pphpd, with 6,000 passengers per game estimated to ride the proposed Project in 2026 in the two hours before each game or event.

As discussed on page 3.17-34 and shown in Table 3.17-4 in Section 17, Transportation, of the Draft EIR, the Draft EIR estimates that 6,000 game or event attendees would ride the proposed Project to a game or event in Dodger Stadium in 2026. This total includes those who would access the proposed Project via bus transit, rail transit, private automobile, rideshare, bicycle, and walk. Of these, the Draft EIR estimates that 4,050 of the 6,000 riders in 2026 would arrive via transit/walk/bike, based on the estimated non-auto mode of access of 67.5 percent, as detailed in Appendix N, Transportation Appendices, of the Draft EIR.¹⁵⁶ The Mobility Lab Study estimates that 4,690 passengers would ride the proposed Project and states that it only modeled passengers that would access the proposed Project via transit, bike and walk. This number (4,690) is actually higher than the corresponding number estimated in the Draft EIR (4,050); as such, the ridership model used in the Draft EIR is actually more conservative than the Mobility Lab Study. Given the closeness of these findings, the Mobility Lab Study then states the following (emphasis added):

¹⁵⁶ The UCLA Mobility Lab Study says that the proposed Project estimated this number to be 4,350. This is not accurate. As discussed in the text, this number is estimated to be 4,050.

The project's Draft Environmental Impact Report contains the same estimate, which **corroborates** the UCLA estimate of ridership if the gondola were in operation today.¹⁵⁷

In other words, the Mobility Lab Study only modeled proposed Project passengers accessing the proposed Project via transit, acknowledges that these estimates are similar to those in the Draft EIR, and then concludes that the Draft EIR estimates actually corroborate the Mobility Lab Study estimate. Given this, it is unclear why the Mobility Lab Study and the comments claim that the gondola would carry fewer passengers than the Draft EIR estimated for the proposed Project. Quite conversely, it would seem that this finding shows that the Mobility Lab Study actually supports the Draft EIR ridership model. In fact, as stated previously, the Mobility Lab Study estimate of 4,690 passengers arriving via transit is higher than the Draft EIR estimate of 4,050 riders arriving via transit/walk/bike.

Furthermore, the Mobility Lab Study estimate is as if the proposed Project were in operation today, whereas the Draft EIR estimates are for future years with future socioeconomic growth (leading to increased vehicle congestion on the regional roadway network) and further expansion of the regional transit system (leading to expanded transit destinations and reduced transit travel times). These factors would enhance the attractiveness of the proposed Project and are considered in the ridership model in the Draft EIR for both 2026 and 2042. All of which further suggests that the Draft EIR ridership estimates are actually conservative compared to the Mobility Lab Study estimate.

Comment ML-6

- **Fewer people would take the gondola after the game – resulting in more traffic and emissions.** In the simulation, some fans – around 2,500 – seem to switch from the free Dodger Stadium Express buses to the gondola on the way from Union Station to a sold-out game, reducing the use of that service by close to half of the passengers it has carried to playoff games in the past. But about half of those passengers – more than 1,000 – seem to switch back to the Dodger Stadium Express on the way home, perhaps to avoid having to wait for a gondola car. Only 1,380 fans take the gondola on the way home in the simulation. This suggests that fans are unlikely to wait in line for the gondola after the game, instead taking the Dodger Stadium Express or perhaps opting for a ride-share, which would increase traffic and greenhouse gas emissions after the game.

Response ML-6

The Mobility Lab Study states that the Mobility Lab simulation shows that almost half of the proposed Project riders who switch to the proposed Project from the Dodger Stadium Express to travel to a game would switch back to the Dodger Stadium Express after a game. Existing Dodger Stadium Express data suggests that there is a post-game drop-off of only around 8 percent, even though fans do wait to board the Dodger

¹⁵⁷ UCLA Mobility Lab, Study Finds Proposed Aerial Gondola to Dodger Stadium Will Do Little to Reduce Traffic and Emissions, October 24, 2022, page 4.

Stadium Express (often for a substantial length of time) after the game and even though the Dodger Stadium Express return trip to Union Station averages 20 minutes or more plus time spent waiting in line. The VMT estimates in the Draft EIR assume that this post-game drop-off shifts to rideshare, based on pre versus post-game TNC trip data for the 2019 season at Dodger Stadium. Since the proposed Project return trip to Union Station will only take seven minutes (as compared to 20 minutes or more for the Dodger Stadium Express), a substantial drop-off is not estimated in the Draft EIR modeling. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for further discussion of post-game ridership.

The comment states that fans opting to take the Dodger Stadium Express or rideshare after a game would increase traffic and greenhouse gas emissions after a game. This statement is inaccurate. Regardless of the extent to which fans may do so, the proposed Project will decrease traffic and greenhouse gas emissions after a game compared to the existing condition.

Comment ML-7

- **Few people would use the gondola as a form of transportation other than to get to or from games.** The simulated use of the gondola during the daytime before the game suggests that very few people would use it as a form of transportation outside of getting to and from games: in the simulation, only 60 people – around one gondola carload – traveled to Dodger Stadium during the day, and only 140 passengers traveled from the stadium to Chinatown or Union Station during the day.

Response ML-7

The comment implies that the modeling conducted in the Mobility Lab Study only considered travel to and from Dodger Stadium during non-game times and the low estimate of 200 persons referenced in the comment implies that the Mobility Lab Study did not consider potential market segments such as tourists. The Draft EIR projected use of the proposed Project by neighborhood transit riders, persons traveling to events at Los Angeles State Historic Park, and tourists. The Draft EIR estimates of local ridership on non-game days (or daytime before a game) also considered future socioeconomic growth, and there is a substantial amount of growth projected in the downtown and Chinatown areas, which would translate to additional local riders (see Table 4 on page 16 of 22 in the Ridership Model Development documentation in Appendix N, Transportation Appendices, of the Draft EIR). As noted on page 3.17-34 in Section 3.17, Transportation, of the Draft EIR, neighborhood transit riders, Los Angeles State Historic Park visitors, and tourists were not considered in the VMT and GHG analyses to allow for a more conservative analysis.

As discussed on pages 3.17-24 to 3.17-26, in Section 3.17, Transportation, of the Draft EIR and in Appendix N, Transportation Appendices, of the Draft EIR, ridership was modeled in the Draft EIR for five different potential rider groups for future (not just existing) background socioeconomic and transportation system conditions: Dodger

Stadium game and event attendees, Dodger Stadium employees, tourists, neighborhood riders, and Los Angeles State Historic Park (LASHP) visitors and event attendees. As discussed on pages 3.17-33 to 3.17-35 and in Table 3.17-4, in Section 3.17, and in Appendix N, depending upon the year and whether or not there is a game or event at Dodger Stadium, there could be as many as 6,000 to 10,000 game attendees, 140 Stadium employees, 1,265 to 3,570 tourists, 575 neighborhood riders, and 1,120 LASHP event attendees on a given day.

Comment ML-8

- **The model produced very similar results at different costs for a gondola trip.** LA ART previously announced that a gondola trip would cost \$15. Later, they announced that game ticket holders could ride the gondola for free. They have also said that local rides could be purchased for a standard Metro fare. The researchers modeled two scenarios: 1) \$10 for residents and free for game ticket holders, and 2) free to the public, and found very little difference in the results, indicating that residents are more likely sensitive to travel time rather than cost. One key factor is that the service area of the gondola is limited and may not attract residents to choose it for daily travel.

Response ML-8

The Mobility Lab Study states that it modeled two fare scenarios: (1) \$10 for residents and free for game ticket holders and (2) free to the public. In other words, the Mobility Lab Study only tested different costs for residents, which are by far the smallest portion of the riders. The Mobility Lab Study apparently did not test different costs for gameday fans. Since the projected amount of neighborhood riders is small, it is not surprising that the Mobility Lab Study found very little difference in the results in the two scenarios it tested.

Also, neither of the fare scenarios the Mobility Lab Study modeled for residents is the fare scenario that is proposed for the proposed Project. Refer to Topical Response C, Project Features, for a discussion of how the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first- and last-mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station.

Comment ML-9**About the Researchers**

Dr. He is an Assistant Research Scientist at the UCLA Mobility Lab. He has extensive experience in big data analytics, transportation system analysis, and transportation policy evaluations. In the scope of cyber-physical systems, his research enables

interactions between the physical infrastructure and virtual cyber systems by adopting data-driven techniques to support long-term urban system planning, management, and decision-making.

Dr. Ma is an Associate Professor in the UCLA Samueli School of Engineering and Associate Director of UCLA Institute of Transportation Studies. He has led and managed many research projects funded by U.S. DOT, NSF, state DOTs, and other federal/state/local programs covering areas of smart transportation systems, such as vehicle-highway automation, Intelligent Transportation Systems (ITS), connected vehicles, shared mobility, and large-scale smart system modeling and simulation, and artificial intelligence and advanced computing applications in transportation. He is an Associate Editor of the IEEE Transactions on Intelligent Vehicles and IEEE Open Journal of Intelligent Transportation Systems and Journal of Intelligent Transportation Systems. He is Member of the Transportation Research Board (TRB) Standing Committee on Vehicle-Highway Automation, Member of TRB Standing Committee on Artificial Intelligence and Advanced Computing Applications, Member of American Society of Civil Engineers (ASCE) Connected & Autonomous Vehicles Impacts Committee, Co-Chair of the IEEE ITS Society Technical Committee on Smart Mobility and Transportation 5.0.

Response ML-9 The credentials of Dr. He and Dr. Ma are noted for the record and will be provided to the decision makers for review and consideration. As noted in the credentials in the comment, Dr. He and Dr. Ma are specialists in the areas of smart transportation systems such as cyber-physical systems, connected vehicles, and artificial intelligence applications in transportation. An internet search of their respective publications^{158,159} did not find any studies of ridership on transit systems in California.

Conclusion

As discussed above, the Mobility Lab Study was announced by press release in October 2022, but was further clarified to be preliminary by its authors in a posting on the Mobility Lab website. The ridership model, assumptions, and estimates in the Draft EIR were prepared by constructing a detailed model utilizing accepted and tested data from both regional and local (City of Los Angeles) modeling, as well as was peer reviewed by a respected international consulting firm and found to be appropriate and reasonable. Any differences between the findings in the Mobility Lab Study and the Draft EIR are therefore to be expected and are explainable. Nothing in the review of the preliminary Mobility Lab Study suggests that the ridership modeling and results in the Draft EIR are unreasonable or inappropriate for use.

¹⁵⁸ <https://www.brianyueshuaihe.com/publications>, accessed May 25 2023.

¹⁵⁹ <https://mobility-lab.seas.ucla.edu/publications/>, accessed May 25, 2023.

TOPICAL RESPONSE P

Gondola System Noise Modeling

Comments on the Draft EIR raised questions regarding the noise model used to predict noise levels from operations of the proposed Project. As discussed in Section 3.13, Noise, of the Draft EIR, on page 3.13-24, there is no universally recognized standard methodology for predicting noise levels for gondola transportation systems. However, a targeted literature review identified a journal article, *Noise prediction models for gondola ropeway components*,¹⁶⁰ (Rossi Article) which was used to predict noise levels that would result from operations of the proposed Project.

Gondola System Background and Technology

Prior to presenting additional information on the noise model, it is useful to first provide a background on gondola system technology. As detailed in Section 2.4, Description of the Proposed Project, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would employ a Tricable Detachable Gondola system (also known as “3S”). The gondola system technology consists of stations, a non-passenger junction, towers to support the cables, and cabins.

Station and Non-Passenger Junction Cables and Ropeway Operations

The proposed Project’s 3S system would be comprised of two stationary cables (track ropes) that provide support for the running wheels of the cabins, and a third cable (haul rope) that would circulate continuously around the system. The haul rope is looped around two large sheaves (wheels with a groove for the rope). One of the large sheaves is the “drive bullwheel,” which would be located at one station/junction, and the other large sheave is the “return bullwheel,” which would be located at the opposing station/junction. The haul rope, which is the propulsion rope, is moved by the turning of the drive bullwheel. The drive bullwheel is turned by motors located at the station or junction. The return bullwheel acts like an idler wheel providing haul rope location control, but no motive power. The haul rope moves at a steady pace around the bullwheels pulling the cabins along the ropeway and in and out of each station or junction.

One haul rope loop would be for the ropeway system between Alameda Station and Broadway Junction, and one haul rope loop would be for the ropeway system between Broadway Junction and Dodger Stadium Station. For the section from Alameda Station to Broadway Junction, the drive bullwheels and associated motors and drive equipment are anticipated to be at the Broadway Junction and the return bullwheels would be located at Alameda Station. At Chinatown/State Park Station within this section, sheaves would control the haul rope. For the section from Broadway Junction to Dodger Stadium Station, the drive bullwheels and associated motors and drive equipment are anticipated to be at Dodger Stadium Station, and the return bullwheels would be located at Broadway Junction. Accordingly, the Broadway Junction would include both a drive bullwheel and a return bullwheel.

¹⁶⁰ Rossi, F. and Nicolini, A. Noise Prediction Models for Gondola Ropeway Components. Noise Control Engineering Journal, 59 (5), pp. 415-431, September-October 2011.

Towers

The towers for the proposed Project would be designed to support the steel cables required for the 3S system. At towers, mechanical equipment would provide rope control and maintenance functions. The track ropes are supported by the profile beams. Between the profile beams, the haul rope rides on a series of wheels, or sheaves, which maintain the rope position.

Cabins

3S Gondola system cabins carry between 30 to 40 passengers depending on the exact configuration of seating and cabin amenities selected. The cabins for the proposed Project would move at a maximum speed of 13.4 miles per hour (6 meters per second).

The Rossi Article Methodology

As discussed in the Rossi Article, noise from gondola system operations “may be not well represented by traditional noise prediction models.”¹⁶¹ Accordingly, the authors of the Rossi Article developed a noise prediction model to provide a more accurate evaluation of the noise produced by the new generation of gondola ropeways. To develop the noise prediction model, the authors conducted “a measurement campaign . . . at different short distances from gondola towers and stations.”¹⁶² The authors investigated two kinds of gondola stations: 1) stations with tensioning systems and 2) stations with underground motor units. The authors investigated three kinds of gondola towers: 1) with support sheaves, 2) with hold-down sheaves, and 3) with double acting sheaves. Based on these noise measurements from several modern aerial gondola systems, the authors established noise propagation models for station noise and tower noise. “[N]oise measurements were conducted on new generation 8-seater gondola ropeways with line speed values of 3.5 m/s and 5 m/s.”¹⁶³ However, the Rossi Article found that the station equations were also suitable for different kinds of gondola ropeways (e.g., with additional seats) and for different line speeds.

The Rossi Article then validates its noise propagation model with “further measurements conducted in random chosen points of gondola ropeway case studies, which correspond to the typical position of critical receptors.”¹⁶⁴ The Rossi Article also explains that the noise propagation model was developed “based on an impacted area with no obstacles between the noise source and the receptors.”¹⁶⁵ Specifically, “the investigated towers and stations are placed in a territory not characterized by natural or artificial noise barriers.”¹⁶⁶ In addition, the most frequent and worst case in terms of carrier load was analyzed for tower noise, and the worst case in terms of noise emissions was analyzed for station noise.¹⁶⁷

As provided in the Rossi Article in Table 6, the sound power levels for stations with underground motor units are louder than the tensioning system. The sound power level reflects the innate acoustical energy

¹⁶¹ Rossi, F. and Nicolini, A. 2011. Noise Prediction Models for Gondola Ropeway Components. Noise Control Engineering Journal, p. 415. Available at: https://www.researchgate.net/publication/257941072_Noise_prediction_models_for_gondola_ropeway_components. Accessed August 2023.

¹⁶² Id., pp. 415-416.

¹⁶³ Id., p. 417.

¹⁶⁴ Id., p. 416.

¹⁶⁵ Ibid.

¹⁶⁶ Id., p. 417.

¹⁶⁷ Ibid.

generated by the operations of the station and, as a result, the sound power values do not consider factors that would affect the actual received sound pressure level at a receiver such as the source type, source dimensions, or the physical environment between the source and receiving point (e.g., distance, reflective ground, air absorption). Accordingly, the sound power levels of the underground motor unit do not reflect that the source is underground and instead reflect that the station is “powered” by a motor. Accordingly, as provided on page 3.13-26 of the Draft EIR, to provide a conservative analysis, the noise analysis for the proposed Project utilized the equations for the underground motor systems (“powered”) because of the higher sound power levels that are generated by those equations.

For towers, the Rossi Article found that hold-down sheaves are louder than support sheaves or double-acting sheaves. Accordingly, as provided on page 3.13-26 of the Draft EIR, to provide a conservative analysis, the noise analysis for the proposed Project utilized the equations for the hold-down sheaves.

As noted above, the Rossi Article equations were established based on 8-seater gondola ropeways. While the Rossi Article found that its equations were suitable for different kinds of gondola ropeways and line speeds, the noise analysis for the proposed Project took the additional step of validating the Rossi Article equations against a 3S gondola system similar to the system that would be used for the proposed Project to ensure that the Rossi Article equations could be appropriately used to predict noise levels from operations of the proposed Project. The validation process is discussed further below.

The Evaluation of Operational Noise Impacts in the Draft EIR Appropriately Relied on the Rossi Article

Based on the design of the proposed Project described above, and as discussed in Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, a 3S gondola system similar to the proposed Project was utilized in the assessment of noise impacts to validate the Rossi Article equations to ensure that the Rossi Article equations could be appropriately used to predict noise levels from operations of the proposed Project.

As provided in the Noise Measurement Detail, included in Appendix M of the Draft EIR, Leitner Poma provided operational noise measurements for a 3S gondola system. As provided in Appendix L, 3S Sound Measurements Memo, of this Final EIR, Leitner Poma updated its memorandum to provide additional detail on this 3S gondola system, which further confirms the similarities between the proposed Project and the Leitner Poma 3S gondola system.

As provided therein, the reference noise levels in Leitner Poma’s Noise Measurement Detail were taken in Tyrol, Austria at the Stubai Glacier. The system is known as the Eisgratbahn gondola. Though in Section 2.0, Project Description, of the Draft EIR, the Koblenz 3S system in Germany is listed as one of many precedent examples of aerial rapid transit systems and is an example of an urban gondola system, the Draft EIR’s assessment of noise impacts does not utilize noise data from the Koblenz 3S system. Because the Koblenz 3S system is located in an urban area, it would be harder to isolate noise levels generated from the 3S system from other urban noise sources, such as, traffic. Accordingly, taking measurements in an urban area for validation purposes is less desirable. In contrast, because the Tyrol system is not located in an urban environment and is instead located in the Alps, the measured noise source from the system was not influenced by other noise sources and nearby buildings reflecting surface. Therefore, it is easier to isolate the noise from the 3S system in Tyrol.

As provided in Appendix M, 3S Sound Measurements Memo, of this Final EIR, the Leitner Poma system in Tyrol has a number of similarities to the proposed Project. Like the proposed Project, the Tyrol system is a 3S system and measurements used for validating the Rossi Article are those using the same speed of the proposed Project at 6 meters/second. In addition, the Tyrol system has a cabin capacity of 32, which is consistent with the proposed Project's cabin capacity of 30 – 40. Finally, the system mechanics would be similar, because like the proposed Project, the Tyrol system includes an above-ground drive motor and bullwheel as well as a return bullwheel at the station where noise measurements were taken. Based on the similarities between the 3S gondola system for the proposed Project and the 3S gondola system in Tyrol, using the Tyrol system to validate the Rossi Article equations is appropriate and no adjustment to the noise predictions is needed to use the Tyrol system to validate the Rossi Article.

Certain comments on the Draft EIR express concern that the Broadway Junction would include both a drive bullwheel and a return bullwheel and therefore the noise assumptions for the junction should not be the same as the assumptions for the stations. Like the Broadway Junction the system in Tyrol includes both a drive bullwheel and a return bullwheel. Accordingly, the assumptions in the Draft EIR conservatively reflect noise associated with both a drive bullwheel and a return bullwheel at all station and junction locations. Therefore, a separate assumption for the Broadway Junction analysis is not needed.

Tables 5-3 and 5-4 of Appendix M, Noise and Vibration Technical Report, of the Draft EIR, summarize the results of the validation calculations and show the predicted noise levels using the Rossi Article equations that were selected for the proposed Project and the measured noise taken from the system in Tyrol. As shown therein, and as discussed on pages 37 through 39 of Appendix M, Noise and Vibration Technical Report, of the Draft EIR, use of the Rossi Article's equations to evaluate the proposed Project's operational noise is validated by the measured noise from the Tyrol system and results in a conservative assessment of the noise generated by the proposed Project. Specifically, as shown in Table 5-3, this comparison led to a conservative average over-prediction of 2.6 dBA across all station locations. In addition, as shown in Table 5-4 the predicted noise levels for the tower on average were within 0.2 dBA of the measured noise levels. The differences in the station and tower noise levels are within the standard engineering tolerance. Specifically, per Caltrans, model accuracy is usually sufficient when the difference between measured and model sound level is less than 3 dBA because of the inherent uncertainties in the measurements and calibration procedure.¹⁶⁸ Accordingly, use of the Rossi Article's equations to evaluate the proposed Project's operational noise was appropriately validated using a 3S gondola system that is similar to the proposed Project and use of the model has been shown to result in a conservative assessment of the noise generated by the proposed Project.

¹⁶⁸ Caltrans, Technical Noise Supplement, Section 4.4.1.6 Tolerances (September 2014).

6.3 RESPONSES TO COMMENTS

Section 6.3, Responses to Comments, includes responses to all comments received on the Draft EIR during the Draft EIR public review period. The comments and responses are organized as follows: state agencies (“S”), local agencies (“L”), groups and organizations (“GO”), individuals (“P”), and verbal and written comments received during the four Draft EIR public hearings (“PH”). Responses to comments are organized as follows:

- Section 6.3.1 Responses to Public Agencies: Contains responses to all state agencies (“S”) and local agencies (“L”) comments.
- Section 6.3.2 Responses to Groups and Organizations : Contains responses to all groups and organizations (“GO”) comments.
- Section 6.3.3 Responses to Public/Individual Comment Letters: Contains responses to all written individuals (“P”) comments.
- Section 6.3.4 Responses to Public Hearings: Contains responses to all verbal and written comments received during the four Draft EIR public hearings (“PH”).

Section 6.3.1
Responses to
Public Agencies (State and Local)
Comment Letters

Comment Letter S1 – CA Department of Fish and Wildlife

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to S1

Comment S1-1 Dear Mr. Zelmer:

The California Department of Fish and Wildlife (CDFW) has reviewed the Los Angeles Aerial Rapid Transit Project (Project) Draft Environmental Impact Report (DEIR) from the Los Angeles County Metropolitan Transportation Authority (Metro). Supporting documentation for the Project includes a Biological Resource Assessment (BRA) dated October 2022. CDFW appreciates the opportunity to provide comments and recommendations regarding aspects of the Project that could affect fish and wildlife resources and be subject to CDFW's regulatory authority under the Fish and Game Code.

Response S1-1 This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses S1-2 through S1-15.

Comment S1-2 CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & Game Code, §§ 711.7, subdivision (a) & 1802; Public Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Public Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & Game Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & Game Code, § 2050 et seq.), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & Game Code, §1900 et seq.) authorization as provided by the applicable Fish and Game Code will be required.

Response S1-2 Metro appreciates the California Department of Fish and Wildlife (CDFW) for preparing comments on the Draft EIR. This comment provides a general summary of the role and authority of the CDFW under CEQA. As noted on page 16 of Appendix E, Biological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, of the Draft EIR, “The [Biological Study Area (“BSA”)] does not include water features falling under CDFW jurisdiction.” Responses to the comments contained in this letter are provided in Responses S1-4 through S1-15.

Comment S1-3 Project Description and Summary

Objective: The Project would connect Los Angeles Union Station (LAUS) to the Dodger Stadium property via an aerial gondola system in downtown Los Angeles. The proposed 1.2-mile route would travel generally along Alameda Street, Spring Street, and Bishops Road from LAUS to Dodger Stadium, with an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. The proposed aerial gondola system would include aerial cables, passenger stations, a non-passenger junction, towers to support the aerial cables between the stations/junction, and gondola cabins for the passengers.

Location: The proposed Project would be located in the County of Los Angeles, within or adjacent to the communities of El Pueblo, Union Station, Chinatown, Mission Junction, Solano Canyon, and Elysian Park.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist Metro in adequately identifying, avoiding, and/or mitigating the Project’s significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

Response S1-3 This comment includes a summary of the proposed Project and does not raise an environmental issue or a substantive issue on the content of the Draft EIR. Responses to the comments contained in this letter are provided below in Responses S1-4 through S1-15.

Comment S1-4 Comment #1: Operational Impacts to Birds

Issue: Project operation may impact resident and migratory bird species that move through the alignment area.

Specific impacts: The BRA states, “Potential direct impacts could include bird collisions with the proposed stations, junction, towers, cabins, and ropeway cables, or electrocution if they come in contact with an energized component of the system.” The BRA also states, “Significant impacts can occur when towers or wires are constructed in migratory corridors and obstruct the flight paths of migrant birds. This is particularly true for structures equipped with constant (rather than flashing)

lighting or reflective surfaces like glass, which tend to attract nocturnal migrants during flight and increase the probability of collision.”

Why impacts would occur: The BRA defends that Project operation will not be significant because, “The proposed Project alignment is located on a broad urbanized coastal plain, midway between the coast and the mountains, and lacks significant wetlands or similar habitats that might attract large numbers of migrants as stopover habitat. Given the lack of habitat and topographic features that would promote concentrated avian migratory activity, impacts to migrants, including nocturnal species, are not expected to be significant.”

Response S1-4

This comment provides quotes from Appendix E, Biological Resources Assessment, of the Draft EIR. Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of the Final EIR for discussion of how the risk of avian collisions with the cables or components of the proposed Project is less than significant. Design features of the proposed Project are likely to reduce the risk of avian collisions in comparison to transmission lines. First, the proposed Project’s ropeway cables would not include a shield wire, unlike transmission lines, which would be expected to reduce collision risk. Second, the tight clustering of the three ropeway cables, in conjunction with the fact that the cables would be thicker than transmission lines, would make them more visible to birds in comparison to transmission lines. Third, the proposed Project would include devices that support and maintain proper separation between the cables of 3S systems known as slack carriers, which would increase the visibility of the cables to birds. Fourth, the proposed Project would implement BIO-PDF-C in response to Recommended Potentially Feasible Mitigation Measure #2, outlined in Comment S1-6, below. The cabin windows would be designed to be non-transparent (tinted) and/or partially covered with a vinyl window film to be made visible to birds in flight. Reflective surfaces would be reduced as much as possible with opaque or translucent surfaces. Fifth, the gondola cabins travel along the cables at frequent intervals during the periods of operation, further increasing the visibility of the cables along which they are moving. Finally, the proposed Project would implement BIO-PDF-B in response to Recommended Potentially Feasible Mitigation Measure #1, outlined in Comment S1-6, below. The Project Sponsor would develop an Avian Collision Mitigation, Monitoring, and Adaptive Management Plan to address the potential for bird collisions. The Plan would include monitoring, training, adaptive management, and reporting requirements related to avian and bat injuries or mortalities. All of these aspects would make the gondola cables less likely to result in avian collisions, compared to transmission lines. Refer to Response S1-5 and S1-6 for additional discussion of how the proposed Project would not pose a collision risk to wildlife.

Comment S1-5

While the Project alignment may not be a large stopover habitat for migrant birds, there are numerous accounts, according to eBird, of many birds that utilize the

alignment area as habitat. In particular, the Los Angeles State Historic Park has a wide variety of bird species that have been accounted for, including a number of special status species such as the loggerhead shrike (*Lanius ludovicianus*) and Peregrine falcon (*Falco peregrinus*) (eBird 2022 {<https://ebird.org/hotspot/L2581057>}). Loggerhead shrike are designated California Species of Special Concern (<https://wildlife.ca.gov/Conservation/SSC>) and Peregrine falcon is a species classified as fully protected (<https://wildlife.ca.gov/Conservation/Fully-Protected>) under CDFW. Even if avian activity is not “concentrated” in this area, the DEIR does not acknowledge the numerous avian species that use the alignment area and its vicinity as habitat. Moreover, there are several locations in the surrounding alignment vicinity with a wide variety of avian species accounts, including Elysian Park, Los Angeles River, Grand Park, Echo Park, and the Silver Lake Reservoir.

Response S1-5

Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of this Final EIR for discussion of the presence of avian habitat and the potential avian use of the proposed Project area. The Draft EIR addressed impacts to biological resources, including special status bird species, in Section 3.04, Biological Resources, with supporting data provided in Appendix E of the Draft EIR. As stated on pages 3.4-12 and 3.4-13 of Section 3.04, Biological Resources, of the Draft EIR, 39 special-status wildlife species were identified by the CNDDDB database to have historically been recorded from the Los Angeles and surrounding eight quadrangles. Nine of those species were historically recorded within the biological study area (BSA) for the proposed Project. However, of the nine species with observations from within the BSA, the most recent are for bat species from 25 to 30 years ago. All other observations are 50 years old or older. Based on this publicly available data, the Draft EIR found that impacts to special status species would be less than significant with incorporation of Mitigation Measures BIO-A and BIO-B to reduce potential impacts to bats and nesting birds especially since the habitat in the area has been drastically modified so as not to be useful to special status species since the species were recorded.

As discussed in Appendix G, Supplemental Biological Resources Report, of this Final EIR, the BSA encompasses a 500-foot buffer around the proposed Project alignment. Habitats and wildlife occurring outside of this 500-foot buffer were considered to be a sufficient distance away to not be affected by construction or operation of the proposed Project. All wildlife detected during the two initial surveys (April 1, 2020, and April 24, 2021) were noted in the Draft EIR. The surveys monitored for all wildlife, including any sensitive species. As discussed in Appendix G, out of an abundance of caution, a third field survey was performed March 23, 2023, to provide an updated habitat assessment for sensitive species and supplementary wildlife survey effort. During this visit, two biologists surveyed the BSA over a 4.5-hour period (11:00 AM to 3:30 PM) and observed 17 bird species and 2 mammal species. As determined by the biologists that conducted the additional survey, there would be no new significant

impacts nor a substantial increase in the severity of an environmental impact identified in the Draft EIR. In addition to the field surveys, as part of the preparation of the Draft EIR, an assessment of habitat suitability and a California Natural Diversity Database (CNDDB) records search were conducted to identify records of sensitive species in the USGS Los Angeles Quadrangle, within which the BSA is located, and the surrounding eight quadrangles; an area measuring approximately 21.5 miles by 26 miles. As noted in the Draft EIR, the most recent CNDDB record of special-status species in the BSA was from 25 years ago, with no records of federal or state-listed wildlife species in the BSA in the past 100 years.

Comment S1-6

In addition, page 48 of the BRA provides reasoning why collisions with cables will not be significant since the diameter and grouping of the cables would make them more visible. However, there is no evidence to support the claim that the diameter and grouping of the cables would prevent bird collisions to a level that is less than significant. More importantly, take is not permitted for fully protected species, so collisions must be completely prevented for these species. Additionally, there is still potential for lighting and reflective surfaces on the gondolas, stations, and towers that may attract birds and cause collisions, especially if birds are flying during low light hours. Artificial light may attract or disorient migrating birds by disrupting navigation. Resident birds and migrants are also known to collide with windows year-round, not only during migration (Ogden 1996).

Impacts to any sensitive, special status species, and/or migratory bird species should be considered significant under CEQA unless they are clearly mitigated below a level of significance. The DEIR does not provide any avoidance, minimization, or mitigation measures to prevent impacts to special status species. Inadequate avoidance, minimization, and mitigation measures for impacts to sensitive or special status species will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species by CDFW.

Evidence impacts would be significant: CEQA provides protection not only for ESA and CESA-listed species, but for any species including but not limited to SSC, which can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). In addition, fully protected status precludes CDFW from authorizing any amount of incidental take or intentional take (including collisions and/or electrocutions associated with operational impacts) to meet any project mitigation requirement (Fish & G Code, § 3511). When projects show the potential to cause take of fully protected species, CDFW advises on appropriate measures to avoid take. Given the legal status of fully protected animals, take avoidance measures should meet very high standards of effectiveness, substantially greater than the measures to minimize take required under Incidental Take Permits. Lastly, migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA)

of 1918 (Code of Federal Regulations, Title 50, § 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). It is unlawful to take, possess, or needlessly destroy the nest or eggs of any raptor. The Project's operational impacts have yet to be mitigated below a significant level. Accordingly, the Project continues to have a substantial adverse effect, either directly or through habitat modifications, on avian species identified as a candidate, sensitive, or special-status species by CDFW.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: CDFW recommends the DEIR include measures to mitigate for collision impacts with the cables, gondola cars, stations, and towers. CDFW recommends Metro develop an Avian Collision Mitigation, Monitoring, and Adaptive Management Plan to address any bird collisions that may occur. This Plan should prescribe the following:

1. Measures to allow birds to see structures during low light hours. Artificial lighting should be eliminated where unnecessary as to prevent attracting birds or shielded down where possible. The DEIR should investigate different types of lights and lighting regimes with reference to their effect on the safety of migrating birds;
2. Measurable goals and success criteria that eliminates or reduces collisions to the maximum extent feasible. Measurable success criteria should be based on site/habitat conditions prior to Project operations. Collisions should be eliminated for fully protected species as no take can occur for these species;
3. Contingency measures if the success criteria is not met;
4. Long-term monitoring for at least 10 years;
5. Adaptive management techniques.; and
6. Annual reporting criteria and requirements.

Mitigation Measure #2: Any windows in stations, towers, or gondolas should be made visible to birds in flight. This may be achieved by using non-reflective tint or window film. Reflective surfaces should be reduced as much as possible with opaque or translucent surfaces.

Response S1-6

Refer to Response S1-5 for a discussion of surveys conducted in connection to the proposed Project, which did not indicate the presence of special-status species, and how the most recent CNDDDB record of special-status species in the BSA was from 25 years ago, with no records of federal or state-listed wildlife species in the BSA in the past 100 years. Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of the Final EIR for discussion of how the risk of avian collisions with the cables or components of the proposed Project is less than

significant. This analysis also discusses how development in the entire Los Angeles Basin provides a major source of light pollution, and there is no evidence that light in the vicinity of the proposed Project would draw migrants to the area, any more than similar lighting in other areas over the Los Angeles Basin would be expected to. In addition, lighting for the proposed Project would be low-level and primarily integrated within the architectural features. Exterior lighting would be shielded or directed toward the areas to be lit to limit spillover onto adjacent properties and off-site uses, and would meet all applicable lighting standards.

Refer to Response S1-4 for a discussion of how the proposed Project includes design features that reduce the risk of avian collisions. In addition, the proposed Project's stations and junction are designed to be open-air buildings, and accordingly do not include any windows. The proposed Project's three towers are designed as monopoles comprised of faceted structural steel panels that comprise the tower's swooping form in a neutral light-tone gray intended to conform to the surrounding urban environment and would not provide a highly metallic or mirrored finish. Accordingly, no windows are proposed for the proposed Project's towers. Because there are no windows at the proposed Project's stations, junction, and towers, Recommended Potentially Feasible Mitigation Measure #2 is inapplicable with respect to those components. As discussed above, windows on the cabins should not pose any risk to diurnal birds because they will be tinted and partially covered with a vinyl window film.

While the proposed Project would not have potentially significant impacts to sensitive, special status species, and/or migratory bird species, in response to Recommended Potentially Feasible Mitigation Measures #1 and #2 in this comment, the proposed Project would incorporate additional Project Design Features (PDFs) (BIO-PDF-B and BIO-PDF-C) to further reduce the already less than significant effects. In response to this comment requesting the proposed Project implement additional measures to protect sensitive, special status species, and/or migratory bird species, the proposed Project will implement BIO-PDF-B, requiring the development of an Avian Collision, Migration, Monitoring, and Adaptive Management Plan to address the potential for bird collisions, including the development of an adaptive management table, and BIO-PDF-C, requiring cabin windows to be designed with non-transparent (tinted) and/or partially covered with a vinyl window film to be made visible to birds in flight. Refer to Section 5.0, Corrections and Additions, of this Final EIR, for a discussion of various Project Design Features adopted in order to provide additional environmental benefits with respect to the potential for bird collisions.

Birds and bats flying in the vicinity of the proposed Project are already exposed to obstacles that present the potential for collision at heights similar to or greater than the highest-reaching proposed Project components. Such objects include buildings in downtown Los Angeles, transmission lines, the radio tower located on Radio Hill, and the eight sets of stadium lights atop Dodger Stadium. In addition, the proposed

Project towers and cables are below the heights where most nocturnal avian collision impacts occur. Most avian flight during migration occurs at thousands of feet above ground level (agl), whereas the proposed Project component heights are all below 200 feet agl. Section 3.04, Biological Resources, of the Draft EIR—as further supported in Appendix G, Supplemental Biological Resources Report, of the Final EIR—states that migrant birds would pass over the alignment, and there is potential for birds to interact with ropeway cables when flying below 175 feet agl and towers when flying below 200 feet agl. However, there is little evidence to suggest that the presence of natural features, such as the Los Angeles River or Silver Lake Reservoir, would result in concentrated migration, specifically in the proposed Project area. The Los Angeles River, which is approximately 0.5 mile east of the BSA is heavily impacted and is predominantly a concrete water-conveyance structure. The river corridor does not contain appreciable vegetation until it reaches more than 1 mile north of the proposed Project BSA. The Silver Lake Reservoir is more than 2 miles to the northwest. Waterbirds and other migrants may pass over the proposed Project en route to and from these locations, but there is no reason to believe the movement would be concentrated in the vicinity of the proposed Project (and below 200 feet agl) versus along alternate routes. Furthermore, direct movements between vegetated portions of the river and the Silver Lake Reservoir would not result in birds passing over the proposed Project alignment.

Comment S1-7 Comment #2: Impacts on Burrowing Owls

Issue: The Project may have a significant impact on burrowing owl (*Athene cunicularia*), a designated Species of Special Concern (SSC).

Specific impacts: Burrowing owls have been recorded at the Los Angeles State Historic Park. Project construction and activities may result in injury or mortality of burrowing owls and disrupt natural burrowing owl breeding behavior.

Why impacts would occur: Nest and roost burrows of the burrowing owl are commonly dug by ground squirrels (*Citellus beecheyi*). According to iNaturalist (https://www.inaturalist.org/observations?nelat=34.07240934999999&nelng=-118.22377465&place_id=any&subview=map&swlat=34.06254515000001&swlng=-118.23908605&taxon_id=180007) (2023), there have been accounts of California ground squirrel within Los Angeles State Historic Park, which can provide potential cover sites for burrowing owls. There were no surveys for burrowing owl conducted for the BRA despite the Project alignment transecting through the Los Angeles State Historic Park. The DEIR, therefore, does not provide compensatory mitigation for potential impacts to habitat for burrowing owl. In California, threat factors affecting burrowing owl populations include habitat loss, degradation, and modification. Project activities could result in potential habitat loss or disturbance for burrowing owl which would subsequently result in local extirpation of the species and contribute to local, regional, and State-wide declines of the species.

According to the DEIR, construction will take approximately 25 months. The Project may therefore temporarily impact habitat supporting burrowing owls for this length of time. However, the DEIR does not disclose how long these temporary impacts may last. Impacts to any sensitive or special status species should be considered significant under CEQA unless they are clearly mitigated below a level of significance. The DEIR does not provide mitigation for potential loss of habitat supporting burrowing owls. Inadequate avoidance, minimization, and mitigation measures for impacts to sensitive or special status species will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species by CDFW.

Evidence impacts would be significant: The burrowing owl is a designated SSC. An SSC is a species, subspecies, or distinct population of an animal native to California that currently satisfies one or more of the following (not necessarily mutually exclusive) criteria:

- is extirpated from the State or, in the case of birds, is extirpated in its primary season or breeding role;
- is listed as ESA-, but not CESA-, threatened, or endangered; meets the State definition of threatened or endangered but has not formally been listed;
- is experiencing, or formerly experienced, serious (nonscyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status; and/or,
- has naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for CESA threatened or endangered status (CDFW 2023a).

CEQA provides protection not only for CESA-listed species, but for any species including but not limited to SSC which can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of SSC could require a mandatory finding of significance (CEQA Guidelines, § 15065).

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #3: CDFW recommends burrowing owl protocol surveys be conducted by a qualified biologist on the Project site and within 100 feet (minimum) of the Project site where there is suitable habitat. Surveys for burrowing owls should adhere to survey methods described in CDFW's March 7, 2012, Staff Report on Burrowing Owl Mitigation (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843>) prior to issuing construction permits (CDFW 2012). In California, the burrowing owl breeding season

extends from February 1 to August 31 with some variances by geographic location and climatic conditions. Survey protocol for breeding season owl surveys states to conduct 4 survey visits: 1) at least one site visit between February 15 to April 15, and 2) a minimum of three survey visits, at least three weeks apart, between April 15 and July 15, with at least one visit after 15 June.

If burrowing owls are identified utilizing the Project site during the surveys, Metro should prepare an Impact Assessment in accordance with the 2012 Staff Report on Burrowing Owl Mitigation. Then, Metro should develop a Burrowing Owl Mitigation Plan in accordance with the 2012 Staff Report on Burrowing Owl Mitigation. Metro should contact CDFW to develop appropriate mitigation/management procedures.

Mitigation Measure #4: CDFW recommends that Metro disclose the length of time for temporary impacts to burrowing owl habitat. Based on those temporary impacts, CDFW recommends Metro mitigate for temporary and direct impacts to burrowing owl. There should be no net loss of burrowing owl habitat. Metro should set aside replacement habitat offsite for acreage of impact and number of burrows. Replacement habitat should be protected in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity, which should include an appropriate endowment to provide for the long-term management of mitigation lands. Mitigation Measure #5: CDFW recommends that Metro avoid using any rodenticides and second-generation anticoagulant rodenticides during Project activities.

Response S1-7

As described in Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR, burrowing owls commonly use ground squirrel burrows for nesting and roosting, and the presence of such burrows suggests that there may be potential for burrowing owl habitat. No California ground squirrels, burrowing owls, or suitable habitat for burrowing owls were detected during initial surveys. Refer to Appendix G, Supplemental Biological Resources Report, of this Final EIR, Section 5.1.2, for additional discussion of burrowing owls and burrowing owl habitat in the proposed Project area. As discussed in Appendix G, a subsequent survey of the BSA was performed on March 23, 2023, during which potentially suitable burrowing owl habitat (open, flat terrain with short vegetation) and immediately adjacent areas were surveyed for the presence of California ground squirrels or their burrows. No California ground squirrels, or burrows were visually detected in the surveyed areas. California ground squirrel vocalizations were heard on the slope between the proposed Stadium Tower and Dodger Stadium Station locations. Although this area could not be surveyed on foot, it was deemed not suitable for burrowing owls due to the presence of trees, tall ground cover vegetation, and a steep slope.

Because there is no suitable habitat for burrowing owls in the BSA, and no known occurrences of burrowing owls are documented in the BSA, the proposed Project would result in a less than significant impact related to burrowing owls. CEQA does

not require the implementation of mitigation measures where impacts would be less than significant. Nevertheless, refer to Section 5.0, Corrections and Additions, of this Final EIR, for a discussion of how the proposed Project will incorporate BIO-PDF-D in response to recommended measure MM-BIO-5 provided in this comment, requiring that the proposed Project avoid using any rodenticides and second generation anticoagulant rodenticides during Project activities.

Comment S1-8 **Comment #3: Tree Removal**

Issue: The Project proposes to remove 250 trees along the Project alignment.

Specific impact: The DEIR lists that one protected tree (Mexican elderberry) would require a replacement ratio of 4:1; 82 trees that are non-protected but are significant would require a replacement of 1:1; 34 street trees would be removed and would be replaced “at a ratio agreed upon during consultation with the Urban Forestry Division”; and 75 trees located on State Park Property would be replaced “on California Department of Parks and Recreation State property and private property at a 1:1 ratio”. Project activities that result in the removal of trees may cause temporary or permanent impacts to wildlife that utilize the trees as habitat.

In addition, Project activities that involve removal of trees or parts of trees have the potential to result in the spread of tree insect pests and disease into areas not currently exposed to these stressors.

Why impacts would occur: The total replacement ratio of all 250 trees to be removed along the Project alignment is currently unknown. CDFW is therefore unable to determine if these replacement ratios are sufficient in mitigating for impacts to trees removed. The lack of complete mitigation ratios for tree removal in the DEIR may result in an ultimate total net loss of trees associated with the Project activities.

Moreover, all trees on site may provide habitat for wildlife within the Project vicinity. These trees may provide adequate habitat for nesting birds and small mammals. Removal of trees on site may temporarily or permanently impact available habitat for wildlife in the area. The loss of trees should be included in the mitigation efforts.

Lastly, there is no proposed investigation and plan for managing tree pests or pathogens at the time of removal. This may result in the introduction of pests, pathogens, or diseases to areas where they previously have not been found.

Evidence impacts would be significant: The greater Los Angeles area is home to a wide variety of migratory and non-migratory species of birds that utilize the urban ecosystem. Studies have shown that street trees provide necessary foraging habitat to birds and are a critical resource to promote avian biodiversity. Feeding bird density has been shown to be positively associated with increases in density and size of street trees. In addition, there is evidence that avian species generally prefer native street-tree species and only a few nonnative tree species for foraging (Wood & Esaian 2020). CDFW is concerned that without sufficient mitigation for the loss of trees, there will

be a negative impact of wildlife species, such as birds, in the alignment area that would use these trees for potential nesting and foraging habitat.

Lastly, without a proper investigation and management plan, the Project may also result in an adverse effect, either directly or through habitat modifications, by exposing other habitats to insect and/or disease pathogens. Exposure to insect and/or disease pathogens may have a substantial adverse effect on any sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or United States Fish and Wildlife Service (USFWS).

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #6: An infectious tree disease management plan should be developed and implemented prior to initiating Project activities. All trees scheduled for removal should be inspected prior to start of those activities for contagious tree diseases including but not limited to: thousand canker fungus (<http://www.thousandcankers.com/>) (*Geosmithia morbida*), Polyphagous Shot Hole Borer (<https://ucanr.edu/sites/eskalenlab/?file=/avocado.html>) (*Eucallitrus spp.*), and goldspotted oak borer (<http://ipm.ucanr.edu/PMG/PESTNOTES/pn74163.html>) (*Agrilus auroguttatus*) (TCD 2022; UCANR 2022; UCIPM 2013). To avoid the spread of infectious tree diseases, diseased trees, or any parts thereof, should not be transported from the Project site without first being treated using best available management practices relevant for each tree disease observed.

Mitigation Measure #7: Given that the DEIR does not provide justification for how the mitigation ratios presented would adequately reduce Project impacts to below a level of significance while considering temporal loss, native trees, size of trees, potential mitigation failure, or other factors, CDFW recommends replacing native trees with at least a 3:1 ratio. CDFW also recommends replacing non-native trees with at least a 1:1 ratio with native trees. CDFW concurs with the replacement ratio for the Mexican elderberry.

Recommendation #1 Phased Tree Removal: CDFW recommends Metro consider phased removal of trees (i.e., phased Project approach) in order to minimize impacts resulting from the temporal loss of trees and to provide structurally diverse tree replacement habitat while mitigation for impacts to tree removal occurs. CDFW recommends providing nesting perch structures in the interim of replacement trees being installed so as no nesting habitat is lost during construction. Perches should be installed at an appropriate distance from the work area to reduce impacts to nesting birds.

Response S1-8

Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of this Final EIR. The proposed Project would implement BIO-PDF-F, and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located. Refer to

Table 4-1 of Appendix G, for discussion of applicable tree replacement requirements in the City of Los Angeles. As shown in this table, protected trees require a replacement ratio of 4:1, while significant trees require a mitigation ratio of 1:1. Removed “street trees” that occur in the public right-of-way (ROW) are to be replaced at a ratio specified by the Urban Forestry Division; typically, at a 2:1 ratio. As discussed on page 3.4-23, in Section 3.04, Biological Resources, of the Draft EIR, it is anticipated that mitigation ratios for trees on land administered or managed by responsible agencies would be agreed to as part of the approvals required for implementation of the proposed Project. The proposed Project would provide a minimum replacement ratio of 1:1 for all trees removed in the Los Angeles State Historic Park and a replacement ratio of 1:1 for significant trees removed in the State Route (SR) 110 California Department of Transportation (Caltrans) ROW.

As discussed in Appendix G, of the Final EIR, removal of certain of the trees for the proposed Project would result in a small reduction of habitat for wildlife species that depend on trees for cover, nesting, roosting, foraging, and other reasons. The magnitude of impacts to wildlife from tree removal depends on several factors, including the amount of habitat to be removed and the quality of that habitat. In the long-term, the impacts are also affected by the replacement plan for the removed trees. The quality of wildlife habitat provided by the trees proposed for removal is relatively low, given that the trees are primarily non-native tree species. Of the 26 tree species identified in the tree inventory report, 20 are considered non-native (and five of those are considered invasive). Furthermore, 122 of the 145 large trees (>8 inches DBH), and 71 of the 105 smaller trees, are non-native species. All of the 57 native trees were planted as ROW trees (12 trees) or were planted as part of a plant program in the Los Angeles State Historic Park, and 34 of these 57 trees are young, with a DBH of <8 inches. Other areas are composed of 100-percent non-native trees, often covered in non-native and invasive vines such as Kudzu (*Pueraria montana*).

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

In the short-term, the removal of trees will result in a marginal reduction of suitable tree habitat for nesting birds, roosting bats, and other wildlife in the vicinity of the proposed Project. Common wildlife species would be expected to utilize adjacent

habitats, and substantial population level impacts to common species would not be expected due to the small amount of habitat loss relative to the amount of habitat available in surrounding areas. In the long-term, the replacement of the 145 large trees proposed for removal with 242 new trees would more than offset any realized impacts associated with the proposed Project.

While the proposed Project would not have significant impacts to sensitive, special status species, and/or migratory bird species through habitat modifications, in response to Recommended Potentially Feasible Mitigation Measures #6 and #7 and Recommendation #1, the proposed Project would incorporate additional Project Design Features (PDFs) to further reduce the already less than significant effects and to provide additional environmental benefits. In response to Recommended Potentially Feasible Mitigation Measures #6 and #7 and Recommendation #1 provided in the comment, an addition to the Draft EIR has been provided to include BIO-PDF-E, requiring the inspection for the presence of contagious tree diseases on trees scheduled for removal and tree disease management if detected, BIO-PDF-F, requiring the proposed Project to comply with applicable tree replacement ratios, and BIO-PDF-G, requiring tree removal for the proposed Project to occur outside of the bird nesting season and bat maternity roosting season. These additions have been incorporated into Section 5.0, Corrections and Additions, of this Final EIR.

Comment S1-9 Additional Recommendations

Recommendation #2 Nesting Birds: CDFW concurs with the nesting bird mitigation measure BIO-B as proposed in the DEIR. However, it should be noted that the temporary halt of Project activities within nesting buffers during nesting season does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. Additional mitigation would be necessary to compensate for the removal of nesting habitat within the Project site based on acreage of impact and vegetation composition. CDFW should be consulted to determine proper mitigation for impacts to occupied habitat depending on the status of the bird species. Mitigation ratios would increase with the occurrence a California Species of Special Concern and would further increase with the occurrence of a CESA-listed species.

Response S1-9 Refer to Mitigation Measure BIO-B, provided in Section 3.4.6, Mitigation Measures, of Section 3.04, Biological Resources, of the Draft EIR, for measures that would be implemented to avoid impacts to nesting birds, including nesting buffers and other monitoring requirements. Refer to Response S1-8 for a discussion of habitat and tree removal and replacement.

Comment S1-10 Recommendation #3 Construction Fencing: CDFW recommends that any fencing used during and after the Project be constructed with materials that are not harmful to wildlife. Prohibited materials should include, but are not limited to, spikes, glass, razor, or barbed wire. Use of chain link and steel stake fence should be avoided or

minimized as this type of fencing can injure wildlife or create barriers to wildlife dispersal. All hollow posts and pipes should be capped to prevent wildlife entrapment and mortality. These structures mimic the natural cavities preferred by various bird species and other wildlife for shelter, nesting, and roosting. Raptor's talons can become entrapped within the bolt holes of metal fence stakes resulting in mortality. Metal fence stakes used on the Project site should be plugged with bolts or other plugging materials to avoid this hazard. Fences should be installed in a manner that excludes any wildlife from entering the work zone (i.e., embedded fence such that wildlife cannot enter from under the fence). Fences should not have any slack that may cause wildlife entanglement.

Response S1-10 In response to Recommendation #3, the proposed Project would incorporate BIO-PDF-H, outlining requirements for construction materials and practices to avoid attracting wildlife to the proposed Project's construction site, to further reduce the already less than significant effects and to provide additional environmental benefits.

Comment S1-11 Recommendation #4 Data: CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database [i.e., California Natural Diversity Database (CNDDDB)] which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species detected by completing and submitting CNDDDB Field Survey Forms (<https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>) (CDFW 2023b). The County should ensure the data has been properly submitted, with all data fields applicable filled out, prior to finalizing/adopting the environmental document. The data entry should also list pending development as a threat and then update this occurrence after impacts have occurred. The County should provide CDFW with confirmation of data submittal.

Response S1-11 Consistent with Recommendation #4, and in accordance with Pub. Resources Code, §21003, subd. (e), the proposed Project's qualified biologist will report all special status species (including Federal or California Threatened or Endangered species, and California Species of Special Concern) documented within the BSA during the development of the proposed Project EIR to the California Natural Diversity Database (CNDDDB) by completing and submitting CNDDDB Field Survey Forms (CDFW 2023b). The qualified biologist will ensure the data has been properly submitted, with all data fields applicable filled out. The data entry will also list pending development as a threat. The qualified biologist will update the occurrence records after impacts have occurred. The qualified biologist will provide CDFW with confirmation of data submittal prior to finalization of the proposed Project EIR.

Comment S1-12 Recommendation #5 MMRP: CDFW recommends the County update the Project's proposed Biological Resources Mitigation Measures and condition the environmental document to include mitigation measures recommended in this letter. CDFW provides comments to assist the County in developing mitigation measures that are

specific, detailed (i.e., responsible party, timing, specific actions, location), and clear for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). The County is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided the County with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment A).

Response S1-12 Refer to Section 7.0, Mitigation Monitoring and Reporting Program, and Table 7-1, Mitigation Monitoring and Reporting Program (MMRP), of this Final EIR, for the MMRP. The MMRP prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. Refer to Section 5.0, Corrections and Additions, of this Final EIR, for BIO-PDF-B through BIO-PDF-H, which were added to this Final EIR in order to provide additional environmental benefits in response to the Recommended Potentially Feasible Mitigation Measures and Recommendations provided in this letter.

Comment S1-13 Filling Fees

The Project, as proposed, could have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & Game Code, § 711.4; Pub. Resources Code, § 21089).

Response S1-13 The Project Sponsor will pay any required filing fees to the Los Angeles County Clerk at the time the Notice of Determination (NOD) is filed in accordance with California Code of Regulations, tit. 14, section 753.5, Fish and Game Code, section 711.4, and Public Resources Code, section 21089.

Comment S1-14 Conclusion

We appreciate the opportunity to comment on the Project to assist Metro in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that Metro has to our comments and to receive notification of any forthcoming hearing date(s) for the Project. If you have any questions or comments regarding this letter, please contact Felicia Silva, Environmental Scientist, at (562) 292-8105 or Felicia.Silva@wildlife.ca.gov.

Sincerely,

Erinn Wilson-Olgin
Environmental Program Manager I
South Coast Region

ec: CDFW

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Response S1-14

This comment provides a general conclusion regarding the comments raised in this letter. Responses to comments raised in this letter are provided in Responses S1-2 through S1-13, and in S1-15.

Comment S1-15

CDFW recommends the following language to be incorporated into a future environmental document for the Project.

Biological Resources			
	Mitigation Measure	Timing	Responsible Party
MM-BIO-1-Operational Impacts	The DEIR shall include measures to mitigate for collision impacts with the cables, gondola cars, stations, and towers. Metro will develop an Avian Collision Mitigation, Monitoring, and Adaptive Management Plan to address any bird collisions that may occur. This Plan shall prescribe the following: 1. Measures to allow birds to see structures during low light hours. Artificial lighting should be eliminated where unnecessary as to prevent attracting birds or shielded down where possible. The DEIR will investigate different types of lights and lighting regimes with reference to their effect on the safety of migrating birds; 2. Measurable goals and success criteria that eliminates or reduces collisions to the maximum extent feasible. Measurable success criteria shall be based on site/habitat conditions prior to Project operations. Collisions shall be eliminated for fully protected species as no take can occur for these species; 3. Contingency measures if the success criteria is not met; 4. Long-term monitoring for at least 10 years; 5. Adaptive management techniques.; and 6. Annual reporting criteria and requirements.	Prior to Construction and/or ground disturbing activities	Metro
MM-BIO-2-Operational Impacts	Any windows in station, tower, or gondolas will be made visible to birds in flight. This may be achieved by using non-reflective tint or window film. Reflective surfaces shall be reduced as much as possible with opaque or translucent surfaces.	Prior to Construction and/or ground disturbing activities	Metro
MM-BIO-3-Burrowing Owl	Burrowing owl protocol surveys shall be conducted by a qualified biologist on the Project site and within 100 feet (minimum) of the Project site where there is suitable habitat. Surveys for burrowing owls shall adhere to survey methods described in CDFW's March 7, 2012, Staff Report on Burrowing Owl Mitigation prior to issuing construction permits (CDFW 2012). In California, the burrowing owl breeding season extends from February 1 to August 31 with some variances by geographic location and climatic conditions. Survey protocol for breeding season owl surveys states to conduct 4 survey visits: 1) at least one site visit between February 15 to April 15, and 2) a minimum of three survey visits, at least three weeks apart, between April 15 and July 15, with at least one visit after 15 June.	Prior to Construction and/or ground disturbing activities	Metro

Biological Resources			
	Mitigation Measure	Timing	Responsible Party
	If burrowing owls are identified utilizing the Project site during the surveys, Metro shall prepare an Impact Assessment in accordance with the 2012 Staff Report on Burrowing Owl Mitigation. Then, Metro shall develop a Burrowing Owl Mitigation Plan in accordance with the 2012 Staff Report on Burrowing Owl Mitigation. Metro shall contact CDFW to develop appropriate mitigation/management procedures. Metro shall submit a final Burrowing Owl Mitigation Plan to Metro prior to the issuing of construction permits.		
MM-BIO-4-Burrowing Owl	Metro shall disclose the length of time for temporary impacts to burrowing owl habitat. Based on those temporary impacts, Metro will mitigate for temporary and direct impacts to burrowing owl. There should be no net loss of burrowing owl habitat. Metro should set aside replacement habitat offsite for acreage of impact and number of burrows. Replacement habitat should be protected in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity, which should include an appropriate endowment to provide for the long-term management of mitigation lands	Prior to Construction and/or ground disturbing activities	Metro
MM-BIO-5-Burrowing Owl	Metro shall avoid using any rodenticides and second-generation anticoagulant rodenticides during Project activities.	Prior to Construction and/or ground disturbing activities	Metro
MM-BIO-6-Tree Disease Management Plan	An infectious tree disease management plan shall be developed and implemented prior to initiating Project activities. All trees scheduled for removal shall be identified and counted to provide total numbers and species type. In addition, trees scheduled for removal resulting from the Project shall be inspected for contagious tree diseases including but not limited to: thousand canker fungus (<i>Geosmithia morbida</i>), Polyphagous Shot Hole Borer (<i>Euwallacea spp.</i>), and goldspotted oak borer (<i>Agrilus auroguttatus</i>) (TCD 2020; UCANR 2020; UCIPM 2013). To avoid the spread of infectious tree diseases, diseased trees shall not be transported from the Project site without first being treated using best available management practices relevant for each tree disease observed.	Prior to Construction and/or ground disturbing activities	Metro

Biological Resources			
	Mitigation Measure	Timing	Responsible Party
MM-BIO-7-Tree Replacement	Given that the DEIR does not provide justification for how the mitigation ratios presented would adequately reduce Project impacts to below a level of significance while considering temporal loss, native trees, size of trees, potential mitigation failure, or other factors, CDFW recommends replacing native trees with at least a 3:1 ratio. CDFW also recommends replacing non-native trees with at least a 1:1 ratio with native trees. CDFW concurs with the replacement ratio for the Mexican elderberry	Prior to Construction and/or ground disturbing activities	Metro
REC-1- Phased Tree Removal	CDFW recommends Metro consider phased removal of trees (i.e., phased Project approach) in order to minimize impacts resulting from the temporal loss of trees and to provide structurally diverse tree replacement habitat while mitigation for impacts to tree removal occurs. CDFW recommends providing nesting perch structures in the interim of replacement trees being installed so as no nesting habitat is lost during construction. Perches must be installed at an appropriate distance from the work area to reduce impacts to nesting birds.	Prior to Construction and/or ground disturbing activities	Metro
REC-2-Nesting Birds	It should be noted that the temporary halt of Project activities within nesting buffers during nesting season does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. Additional mitigation would be necessary to compensate for the removal of nesting habitat within the Project site based on acreage of impact and vegetation composition. CDFW shall be consulted to determine proper mitigation for impacts to occupied habitat depending on the status of the bird species. Mitigation ratios would increase with the occurrence a California Species of Special Concern and would further increase with the occurrence of a CESA-listed species.	Prior to Construction and/or ground disturbing activities	Metro
REC-3-Fencing	CDFW recommends that any fencing used during and after the Project be constructed with materials that are not harmful to wildlife. Prohibited materials should include, but are not limited to, spikes, glass, razor, or barbed wire. Use of chain link and steel stake fence should be avoided or minimized as this type of fencing can injure wildlife or create barriers to wildlife dispersal. All hollow posts and pipes should be capped to prevent wildlife entrapment and mortality. These structures mimic the natural cavities preferred by various bird species and other wildlife for shelter, nesting, and roosting. Raptor's talons can become entrapped within the bolt holes of metal fence stakes resulting in mortality. Metal fence stakes used on the Project site should be plugged with bolts or other plugging materials to avoid this hazard.	Prior to Construction and/or ground disturbing activities	Metro

Biological Resources			
	Mitigation Measure	Timing	Responsible Party
	Fences should be installed in a manner that excludes any wildlife from entering the work zone (i.e., embedded fence such that wildlife cannot enter from under the fence). Fences should not have any slack that may cause wildlife entanglement.		
REC-4-Data	CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database [i.e. California Natural Diversity Database (CNDDB)] which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species detected by completing and submitting CNDDB Field Survey Forms (CDFW 2023b). The County should ensure the data has been properly submitted, with all data fields applicable filled out, prior to finalizing/adopting the environmental document. The data entry should also list pending development as a threat and then update this occurrence after impacts have occurred. The County should provide CDFW with confirmation of data submittal.	Prior to Construction and/or ground disturbing activities	Metro

Response S1-15 While the proposed Project would not have significant impacts to biological resources after the implementation of mitigation as identified in the Draft EIR, the proposed Project would incorporate additional Project Design Features (PDFs) to further reduce the already less than significant effects and to provide additional environmental benefits. In response to CDFW's comments, an addition to the Draft EIR has been provided for to incorporate BIO-PDF-B through BIO-PDF-H. This addition has been incorporated into Section 5.0, Corrections and Additions, of this Final EIR.

Refer to Response S1-6 for a discussion of how the proposed Project will incorporate BIO-PDF-B and BIO-PDF-C in response to recommended measures MM-BIO-1 and MM-BIO-2 provided in this comment. Refer to Response S1-7 for a discussion of how there is no suitable habitat for burrowing owls in the BSA, and no known occurrences of burrowing owls are documented in the BSA such that the proposed Project would result in less than significant impacts related to burrowing owls, and therefore the proposed Project need not implement the recommended measures MM-BIO-3 and MM-BIO-4 provided in this comment. Refer Response S1-7 for a discussion of how the proposed Project will incorporate BIO-PDF-D in response to recommended measure MM-BIO-5 provided in this comment, requiring that the proposed Project avoid using any rodenticides and second generation anticoagulant rodenticides during Project activities. Refer to Response S1-8 for a discussion of how the proposed Project will incorporate BIO-PDF-E, BIO-PDF-F, and BIO-PDF-G in response to recommended measures MM-BIO-6, MM-BIO-7, and REC-1 provided in this comment. Refer to Mitigation Measure BIO-B, provided in Section 3.4.6, Mitigation Measures, of the Draft EIR, for measures that would be implemented to avoid impacts to nesting birds, including nesting buffers and other monitoring requirements in response to REC-2 in this comment. Refer to Response S1-10 for a discussion of how the proposed Project will incorporate BIO-PDF-H in response to REC-3 provided in this comment. Refer to Response S1-11 for a discussion of how the proposed Project's qualified biologist will report all special status species (including Federal or California Threatened or Endangered species, and California Species of Special Concern) documented within the BSA during the development of the proposed Project EIR to the California Natural Diversity Database (CNDDDB) by completing and submitting CNDDDB Field Survey Forms (CDFW 2023b), consistent with REC-4 provided in this comment.

Comment Letter S2 – CA Department of Parks and Recreation

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to S2

Comment S2-1 Dear Mr. Zelmer,

The California Department of Parks and Recreation (State Parks) welcomes the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Los Angeles Aerial Rapid Transit Project (Project). State Parks is a State Agency as defined by the California Environmental Quality Act (CEQA) and our mission is to provide for the health, inspiration, and education of the people of California by helping preserve the state's extraordinary biodiversity, protecting its most valued natural and cultural resources, and creating opportunities for high quality outdoor recreation.

State Parks and its partners spent more than 20 years planning, developing, and protecting the Los Angeles State Historic Park (LASHP). This park provides the city and surrounding communities with much-needed public open space and iconic views of downtown, opportunities for civic engagement and public programming on the cultural significance and diversity of greater Los Angeles, all while also protecting valuable historic resources within the urban core of Los Angeles.

The LASHP has also become a popular venue for special events, large and small, drawing visitors from all over the world. While State Parks recognizes that the Project is expected to result in numerous public benefits, including traffic reduction, better air quality, and improved transportation connectivity for the surrounding communities, all of which are consistent with the state's broad environmental goals and supported by State Parks, it will also impact LASHP operations in significant ways, as described in more detail below.

Response S2-1 This comment provides a general introduction to the comments raised in this letter. Metro and the Project Sponsor acknowledge the more than 20 years of effort the community undertook to convert the closed rail yard at River Station to what is now the Los Angeles State Historic Park. The planning, developing, and efforts made by State Parks and its partners resulted in a park that provides the “a place to learn and to celebrate the ethnically diverse history and cultural heritage of Los Angeles” for the surrounding community, greater Los Angeles, and visitors from around the world, one that the proposed Project is designed to honor and expand upon.¹ As noted in the comment, the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel are discussed in Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air

¹ California State Department of Parks and Recreation, Los Angeles State Historic Park General Plan and Final Environmental Impact Report, June 2005, p. 68.

Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of this system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. The proposed Project would also provide service to events at the Los Angeles State Historic Park. In addition to providing service on game and special event days at Dodger Stadium and events at the Los Angeles State Historic Park, it is anticipated that the proposed Project would also provide daily service between 6:00am to 12:00am, for the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. The proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. In addition, through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and park amenities. Refer to Response S2-2 for a discussion of the minimal ways the proposed Project would affect park operations. Through continued collaboration with State Parks and other stakeholders, the proposed Project benefits would outweigh those affects and would be a net benefit for visitors to the park.

Comment S2-2 The proposed project, with respect to the LASHP, includes a station for loading and unloading passengers at the southern entrance of the park, with ropeways and cabins traversing the southwestern edge of the park, connecting the LASHP station with a junction tower just outside of the park on the other side of Broadway. In total, the Project would require permanently taking approximately 0.21 acres for the physical transit station, and up to 1.87 acres of the 32-acre park (6%) that would be restricted

not only by the station, but by the overhead development and operational rights for the aerial infrastructure, including the cable ropeway, which would be suspended at just 26 feet over the park at its lowest spot. If constructed, the Project would require the demolition of park improvements in the project area, with additional areas to be impacted in the event these improvements, such as the Cargo Snack Shack concession and restrooms, are relocated to other areas of the park. Furthermore, a number of trees will need to be removed and the areas under the ropeway will need to be kept clear of vegetation and structures over a certain height, thus reducing the available park space for event organizers and public park users, potentially limiting the size and scope of future events.

Response S2-2

As discussed in Section 2.0, Project Description, Section 3.16, Recreation and Parks, and Section 5.0, Other CEQA Considerations, of the Draft EIR the proposed Project's Chinatown/State Park Station would be integrated into the southern boundary of the Los Angeles State Historic Park, and the proposed Project alignment crosses over the westernmost edge of the park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The station would have a footprint of 2,195 square feet in the park, and the station canopy would have an overhang of 9,320 square feet over the park (including the 2,195 square foot footprint in the park). The proposed Project's required horizontal aerial clearance width over the park would be 53 feet 2 inches wide with an area of approximately 59,470 square feet, plus an Additional Separation Buffer.² As shown in Figure 5-2 of the Draft EIR, more than 30 of the park's 32 acres are not beneath the proposed Project's alignment, which is above mostly hardscaped, landscaped, and grassy areas along the westernmost edge of the park. ANSI B77.1 requires the following vertical clearances: vehicles – five feet; vegetation or terrain – five feet; at-grade where pedestrians are present – eight feet; buildings – five feet; and roadways or railways – to be determined with the authority having jurisdiction. The proposed Project's vertical clearance to the bottom of the cabins would range from 26 to 53 feet with an average of approximately 40 feet from ground level over the park. Given these required clearances and the height at which the cabins would travel over the park, it will continue to be possible for most events to take place both under the majority of the alignment within the park and adjacent to the alignment. Use of more than 30 of the park's 32 acres for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. The proposed Project does not propose to demolish, nor does it need to demolish the Cargo Snack Shack concession or restrooms however, proposed Project construction would affect the current location of its outdoor seating area. The Project Sponsor would coordinate with State Parks and the concessionaire on the potential to provide alternative

² Section 3.4.6, Aerial Clearance, of Section 3.0, Project Description, of the Final EIR details the proposed Project's Additional Separation Buffer.

seating locations during construction. Refer to Section 3.17, Transportation, and Section 3.11, Land Use and Planning, of the Draft EIR, for discussion of how multimodal access—for both local and emergency response—to local businesses, neighborhoods, LAUS, and the Los Angeles State Historic Park would be maintained throughout construction of the proposed Project, and disruptions to local businesses would be minimized. Refer to Topical Response C, Project Features, for discussion of the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The proposed Project includes new park amenities, including approximately 740 square feet of new concessions, 770 square feet of new restrooms, and a 220 square foot covered breezeway connecting the new concessions and restrooms. These amenities would be operated by the Los Angeles State Historic Park and/or the operator as determined by the Los Angeles State Historic Park. The proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located. As discussed on page 3.4-23, in Section 3.04, Biological Resources of the Draft EIR, and in Appendix K.1, Updated Tree Inventory Report, and in Appendix G, Supplemental Biological Resources Report, of this Final EIR, the removal of the 75 trees within Los Angeles State Historic Park would require a permit or approval from the California Department of Parks and Recreation, and all existing trees required to be removed on California Department of Parks and Recreation property would be replaced at a minimum 1:1 ratio within the Park or as agreed to as part of the approvals required for implementation of the proposed Project from the Department, including the General Plan Amendment. In addition, 6 trees within the public ROW located near the Los Angeles State Historic Park would be replaced at a ratio specified by the Urban Forestry Division, typically, at a 2:1 ratio.

Comment S2-3 As noted in the DEIR, the Project is not consistent with the LASHP General Plan, which would need to be amended prior to State Parks granting any administrative approvals. Authority for approving such state park general plan amendments rests solely with the State Park and Recreation Commission (SPRC). While the project applicant would be responsible for submitting a general plan amendment document that meets State Parks' requirements and policies for such proposals, State Parks would also be responsible for analyzing and making recommendations to the SPRC. State Parks understands that the thresholds under CEQA and the required record and analysis for a general plan amendment are different.

Response S2-3 As discussed in Section 3.11, Land Use and Planning, of the Draft EIR, State Parks considers there to be an inconsistency between the proposed Project and the Los Angeles State Historic Park General Plan and therefore a potentially significant impact because the Los Angeles State Historic Park General Plan does not identify transit as a use for the park. Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain a Los Angeles State Historic Park General Plan Amendment. The General Plan Amendment is subject to the review and approval by

the State Park and Recreation Commission, which retains its independent authority related to the proposed Project. The General Plan Amendment process would include additional public processes before the Commission. With implementation of Mitigation Measure LUP-A, impacts related to inconsistencies with the Los Angeles State Historic Park General Plan would be reduced to less than significant. Refer to Topical Response F, Los Angeles State Historic Park, for discussion of how State Parks has the authority to grant the necessary approvals for the proposed Project consistent with the park's General Plan. State Parks will undertake its own review of the proposed Project when the Project Sponsor seeks approvals for its use of Los Angeles State Historic Park from State Parks, including during the General Plan Amendment process under the authority of the State Park and Recreation Commission.

Comment S2-4 However, State Parks recommends that the project applicant further analyze the following impacts in the DEIR: (1) the substantial loss of property within LASHP;

Response S2-4 Refer to Response S2-2 regarding the Chinatown/State Park Station and proposed Project alignment within the Park. As discussed in Section 3.16, Park and Recreational Facilities, of the Draft EIR, the construction and operational impacts of the proposed Project would result in less than significant impacts to the park under CEQA. The Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would overhang 9,320 square feet of the park (including the 2,195 square foot footprint). The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required horizontal aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park (~1.4 million square feet), plus an Additional Separation Buffer. While the Chinatown/State Park Station's footprint will occupy 2,195 square feet within the park, through continued collaboration with State Parks which has been ongoing and will continue through the General Plan Amendment process, the proposed Project would be fully integrated into the park such that it would add to, rather than take away from, the park's purpose and objectives. For example, in addition to the concessions, restrooms, and breezeway discussed above, the Chinatown/State Park Station would also include a mobility hub where passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program. Pedestrian access enhancements could include pedestrian improvements between Metro's L Line (Gold) Station and the Chinatown/State Park Station consistent with the Connect US Action Plan, including hardscape and landscape improvements, shade structures, and potential seating, as well as support for the future Los Angeles State Historic Park bike and pedestrian bridge. The Chinatown/State Park Station would provide passenger access to Chinatown, LASHP, and to nearby neighborhoods and land uses, including the Mission Junction neighborhood, which includes the William Mead Homes public housing complex. In addition, the station canopy would provide much needed shade. As discussed in

Topical Response F, Los Angeles State Historic Park, the Project Sponsor would work with State Parks through the General Plan Amendment process to develop an “Interpretation Plan” to identify unique ways to use the proposed Project to provide interpretation for the park and its history. The Interpretation Plan would help ensure that the proposed Project is a benefit to Los Angeles State Historic Park by providing visitors with, consistent with the park’s existing General Plan, an engaging and informative experience that deepens their understanding and appreciation of Los Angeles State Historic Park’s culture and history as a former transportation hub.

Comment S2-5

(2) the impairment of scenic viewsheds and high-value open space; and

Response S2-5

Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, including to the park, which would be less than significant. As discussed therein, the Draft EIR and Visual Impact Assessment specifically addressed and disclosed potential impacts on changes in the visual environment and existing viewsheds of or from the Los Angeles State Historic Park. The Draft EIR studied thirty Key Observation Points (KOPs), including nine that simulated views of or from Los Angeles State Historic Park:

- KOP 12: Looking North on Alameda Street/Spring Street from South of College Street
- KOP 15a: Looking Northeast from Spring Street adjacent to Metro L Line (Gold)
- KOP 15b: Looking Northeast from Spring Street near Southernmost Entrance to Los Angeles State Historic Park
- KOP 16a: Looking Southwest from Southwestern Portion of Los Angeles State Historic Park
- KOP 16b: Looking Southeast from the Southwestern Portion of Los Angeles State Historic Park
- KOP 17: Looking Southwest from Roundhouse within Los Angeles State Historic Park
- KOP 18: Looking Southwest from Spring Street adjacent to Los Angeles State Historic Park
- KOP 19: Looking Southwest from within Los Angeles State Historic Park
- KOP 20: Looking Southwest from North Broadway historic bridge

The Draft EIR analyzed each of these KOPs, describing the existing viewpoint along with a visual simulation of the proposed Project. With respect to views from within the park, the Draft EIR concluded that certain southwest-facing views of the downtown Los Angeles skyline, particularly close to the proposed Chinatown/State Park Station, would be partially interrupted due to the proposed Project. However,

the Draft EIR noted that these views are already partially interrupted by trees and intervening development, and the nature of the proposed Project (i.e., cables with similar characteristics to prevalent existing powerlines and cabins that are constantly moving in and out of view) means that the proposed Project would not significantly impact views from the park.

The Draft EIR concluded that the proposed Project would not adversely impact or interfere with key viewpoints or the visual character of the park.

Nevertheless, in response to this comment, the Final EIR includes additional KOPs to further analyze viewshed impacts to Los Angeles State Historic Park. Refer to Appendix H.1, Memo Regarding Preparation of KOPs, and Appendix H.2, Supplemental KOPs in Response to Comments, of this Final EIR, for a discussion of the preparation of the supplemental KOPs, and the analysis of the supplemental KOPs, respectively. As demonstrated by the analysis of the simulated views in these supplemental KOPs, views from the park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views. In addition, refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including views from a cabin over the park, providing a new and unique perspective of the park and its surroundings, including the Roundhouse Observation Deck and the exposed Zanja Madre, which is currently not visually apparent from inside the park.

The Draft EIR also analyzed the proposed Project's consistency with Goals and Guidelines from the Los Angeles State Historic Park General Plan that relate to aesthetics (see pages 3.11-39 to 3.11-41). As detailed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, consistent with the General Plan's Aesthetic Goal, the proposed Project would protect and enhance scenic viewsheds and features and preserve the visitor's experience of the surrounding landscape by minimizing impacts to aesthetic resources. The proposed Project's design would incorporate appropriate urban design elements at the neighborhood level, preserve natural viewsheds of hillside areas, and protect additional open space and aesthetics resources consistent with policies from the Los Angeles State Historic Park General Plan.

The proposed Project's design and building materials would complement the architectural themes of the neighborhood and would complement the visual character of the existing buildings in the area. The Chinatown/State Parks Station's location would not block any designated scenic vistas, alter scenic resources, or block panoramic views. Additionally, potential impacts to visual quality and character are minimized by the location of the Chinatown/State Park Station, which is in the southernmost portion of the park, away from the open passive park areas (discussed further below).

The proposed Project components would consist of a modern architectural design, which would complement the existing modern style buildings in this area. In addition, the neutral light-tone gray of the proposed Project components would be consistent with modern structures in the surrounding urban environment. The new amenity building intended for use by proposed Project riders and park visitors alike are designed to reflect the scale and materiality of the existing visitor amenity buildings located within the Los Angeles State Historic Park.

Refer to Topical Response M, Comparable Urban Aerial Transit Systems for a discussion of how other urban aerial transit systems have been successfully incorporated into their surroundings, including public open space and public parks.

Further, consistent with Los Angeles State Historic Park General Plan Aesthetic Guideline 1, the Project Sponsor has taken steps to further minimize the effects of the proposed Project on the park's visual resources and high-value open space. This has included collaboration with State Parks resulting in selecting a primary alignment along the western edge of Los Angeles State Historic Park, rather than through the middle of the park, in order to reduce visual and other Park impacts. Additionally, the Project Sponsor worked with State Parks to determine the new location of the Chinatown/State Park Station to improve pedestrian flow into the park and what other improvements would further enhance the experience of visitors (e.g., increased landscaping and hardscaping, new restrooms and concession areas, etc.). This resulted in moving the station to the southernmost edge of the park.

As discussed in more detail in Topical Response F, Los Angeles State Historic Park, in response to Los Angeles State Historic Park stakeholders' comments on the proposed Project's Notice of Preparation and discussions with State Parks, numerous design considerations have been incorporated into the proposed Project to minimize the aesthetic effect of the proposed Project on the park, including reducing the size and scale of the station to be further in line with the neighborhood characteristics, integrating the existing historic granite pavers, and carefully considering the optimal location for the station.

Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction and operational noise impacts from the proposed Project, including in the Los Angeles State Historic Park. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation, and operational noise impacts would be less than significant.

Comment S2-6 (3) project impacts that will constrain and reduce the ability to utilize the LASHP for special events.

Response S2-6 Refer to Response S2-2 regarding the Chinatown/State Park Station and proposed Project alignment within the Park. As discussed in Section 5.5.2, Special Events at the Los Angeles State Historic Park, in Section 5.0, Other CEQA Considerations, of the

Draft EIR, with the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the park for special events and activities that use significant airspace (e.g., concerts with tall screens and kite flying) would not be affected by the proposed Project. Additionally, other special events that do not use significant airspace (e.g., craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market) and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. In addition, the access road currently used for event set-up and breakdown would continue to be available for use. The proposed Project could affect the ability to use areas directly beneath the alignment for certain specific special event structures, however, the proposed Project alignment over the park is largely over a hill where it is difficult to stage special events, and the park does not include in their planned locations for special events. Due to the location of the proposed Project alignment, which crosses over a small portion of the park not typically used for screens and stages, and because events can still take place under the majority of the proposed Project alignment, the proposed Project does not significantly reduce the event space area within the Los Angeles State Historic Park or limit the number of people that can attend events at the park. Coordination as to operation of special events at the Los Angeles State Historic Park and the proposed Project are anticipated to be addressed in operational agreements related to the park.

Comment S2-7 Other impacts such as, but not limited to, hours of operation, design and materials of facilities, and access during construction, are also meaningful issues that will need to be discussed further during the general plan amendment process before the SPRC.

Response S2-7 Coordination as to operational issues such as hours of operation are anticipated to be addressed in operational agreements related to the park. Refer to Sections 2.0, Project Description, 3.16, Parks and Recreational Facilities, and 5.0, Other CEQA Considerations, for further discussion of operational considerations such as the dual-gate design that will ensure that park areas would not be accessible once the park is closed.

Regarding the proposed Project design and the materials used for the Chinatown/State Park Station and the park amenities, as discussed in Section 2.0, Project Description, and Appendix C, Visual Impact Assessment, of the Draft EIR, the proposed Project would not adhere to a fixed, Procrustean design across the entire system, but each individual component would be designed to weave seamlessly into the surrounding urban fabric, and the colors and material finishes of each station and junction would be chosen to be complementary to each of their respective sites. The Project Sponsor would work with State Parks and its stakeholders to select a design and materials for the Chinatown/State Park Station and the park amenities to seamlessly integrate into and complement the park's surroundings.

As discussed in Section 3.16, Parks and Recreational Facilities, of the Draft EIR, construction of the Chinatown/State Park Station would require the temporary closure of approximately 1.59 acres of the southern entrance to Los Angeles State Historic Park during the approximately 19 months construction duration for the Chinatown/State Park Station. While there would be a temporary closure, access to the park would be maintained as there are various access points (e.g., at the intersection of Sotello and North Spring Street) to Los Angeles State Historic Park. Construction of the Chinatown/State Park Station would not require any closures of areas used for recreation; however, it would affect the current location of the outdoor seating area associated with the park concessionaire. The Project Sponsor would coordinate with State Parks and the concessionaire on the potential to provide alternative seating locations during construction. Refer to Section 3.17, Transportation, and Section 3.11, Land Use and Planning, of the Draft EIR, for discussion of how multimodal access—for both local and emergency response—to local businesses, neighborhoods, LAUS, and the Los Angeles State Historic Park would be maintained throughout construction of the proposed Project, and disruptions to local businesses would be minimized. Refer to Topical Response C, Project Features, for discussion of how the Project Sponsor would create a Business and Community Support Program to assist local businesses financially affected by proposed Project construction activities.

The Project Sponsor would continue to collaborate with State Parks and other stakeholders to ensure adequate vetting and consensus around the benefits from the proposed Project.

Comment S2-8

Should the General Plan be successfully amended to include the Project, State Parks looks forward to working collaboratively with the Project team to identify appropriate operational agreements, transactional terms, and other measures needed to ensure the benefits of the Project outweigh the impacts, direct and indirect costs, and specifically, ensure that LASHP visitors' overall experiences will be improved as a result.

Sincerely,
Jason De Wall
Northern Field Division Chief
cc: Kathy Amann, Deputy Director

Response S2-8

The Project Sponsor shares State Parks' objective to ensure that Los Angeles State Historic Park visitors' overall experiences will be improved as a result of the proposed Project and believes that through continued collaboration, that objective will be met.

Comment Letter S3 – CA Department of Highway Patrol

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to S3

Comment S3-1 To whom it may concern:

I was recently requested to perform an Environmental Impact Review for a project involving the Los Angeles Aerial Rapid Transit system. Specifically, a gondola aerial system that would transport pedestrian traffic from Los Angeles Union Station to Dodger Stadium.

Response S3-1 This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not address an environmental issue or raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment S3-2

S3-2A The California Highway Patrol's interest in commenting surrounds our concern for vehicular traffic traveling on the State Route (SR) 110 freeway. Our concerns include increased traffic congestion in the area due to the visual hazard of gondola cabins, the possibly of projectiles being thrown onto the freeway from pedestrian's traveling within gondola cabins, and increased calls for service in the area of the gondola to remove objects being thrown from gondola cabins.

S3-2B Due to the aforementioned concerns, we feel this project, if approved, would adversely affect the Central Los Angeles Area and vehicular traffic within the area.

If you need further assistance, please contact the administrative sergeant, Sergeant J. Allen, at (213) 744-2231.

Sincerely,

J.I. Perry, Captain
Commander
Central Los Angeles Area

Enclosure(s)

Cc: Southern Division
Special Projects Section, Transportation Planning Unit

Response S3-2

S3-2A Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion of the proposed Project's design and operations, including discussion of the safety, privacy, and operations features of the proposed Project. Refer to Section 3.01, Aesthetics, and

Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, including to motorists, which would be less than significant. The methodology utilized to examine potential aesthetic impacts follows the guidance outlined in the Federal Highway Administration's *Guidelines for the Visual Impact Assessment of Highway Projects* (2015). As discussed on page 3.1-12, viewer exposure for motorists is low due to the short duration of views and high travel speeds of vehicles. Viewer sensitivity for motorists is considered low due to the task or demand of paying careful attention to the road ahead. Moreover, as discussed on page 3.1-50, motorists traveling on SR-110 would have fleeting and/or temporary views of the Project components. Refer to Topical Response K, Signage and Lighting, for discussion of how no digital signage is proposed on the exterior of the cabins. Signage proposed for the exterior of the cabins is static non-illuminated naming rights signage. In addition, the bottom of cabins would be 89 feet above northbound SR-110 and 98 feet above southbound SR-110, with the gondola cables 109 feet above northbound SR-110 and 118 feet above southbound SR-110. As discussed in Section 2.0, Project Description of the Draft EIR, cabins would feature a ventilation system and sealed windows for viewing purposes, which, for security reasons, would not open. Any small ventilation panels that would be provided as a feature of the proposed Project cabins would be screened to prevent the tossing of debris from cabins. Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing vehicle miles traveled.

S3-2B

This comment provides a general conclusion regarding the comments raised in this letter. Responses to the comments contained in this letter are provided above in Response S3-2A.

Comment Letter S4 – Caltrans

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of this Final EIR, for reference.

Responses to S4

Comment S4-1 Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed Project would connect LA Union Station to the Dodger Stadium property via an aerial gondola system with an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. The Project would provide an aerial rapid transit (ART) option for visitors to Dodger Stadium, while connecting surrounding communities, including Chinatown, Mission Junction, Elysian Park, and Solano Canyon, and the Los Angeles State Historic Park, to the regional transit system accessible at LAUS. The aerial gondola system would be approximately 1.2 miles and consist of cables, three passenger stations, a non-passenger junction, three towers, and gondola cabins. When complete, the proposed Project would have a maximum capacity of approximately 5,000 people per hour per direction, and the travel time from LAUS to Dodger Stadium would be approximately 7 minutes. The proposed Project would provide pedestrian improvements, including hardscape and landscape improvements, as well as amenities at the Los Angeles State Historic Park. The ART system has the ability to overcome grade and elevation issues between LAUS and Dodger Stadium and provide safe, zero emission, environmentally friendly, and high-capacity transit connectivity in the Project area that would reduce greenhouse gas (GHG) emissions as a result of reduced vehicular congestion in and around Dodger Stadium and on neighborhood streets, arterial roadways, and freeways. The proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Response S4-1 This comment is noted and will be provided to the decision makers for review. Metro appreciates the California Department of Transportation (Caltrans) preparing comments on the Draft EIR. The comment includes a summary of the project description and does not address an environmental issue or raise a substantive issue regarding the content of the Draft EIR. No further response is warranted.

Comment S4-2 The nearest State facility to the proposed project is SR-110. After reviewing the DEIR, Caltrans has the following comments:

Based on the information provided, Caltrans supports Design and Use option E, as it provides a much-needed bike and pedestrian bridge connecting North Broadway to the Los Angeles Historic Park. This connection is critical to the project's success, as it will allow the residents, employees, and students north of the Metro L line tracks to access the park and its new station. This not only improves the potential ridership for the proposed project but provides a greatly enhanced active transportation network for all Californians who will ever visit, live, or work in the area. For these reasons

Caltrans would also discourage the selection of Use Option D, which would substitute the proposed Chinatown/State Park Station for a non-passenger junction. This option greatly reduces the project's effectiveness, and needlessly limits accessibility to an additional mode of travel to and from a valuable green space.

Response S4-2

This comment indicating support for the proposed Project Design and Use Option E (the Los Angeles State Historic Park Pedestrian Bridge), and lack of support for Use Option D (Chinatown/State Park Station as a Non-Passenger Junction), is noted for the record and will be provided to the decision makers for review and consideration. As discussed in Topical Response C, Project Features, while not proposed as part of the proposed Project, the Draft EIR included as Design and Use Option E an analysis of the State Park's proposed bike and pedestrian bridge. The bridge would provide important connections for students at Cathedral High School, as well as between the park and the Chinatown, Savoy, and Solano Canyon neighborhoods to support convenient access for the community. The analysis serves to provide environmental clearance for the bike and pedestrian bridge as a benefit to the Los Angeles State Historic Park, as while the bike and pedestrian bridge was mentioned in the Los Angeles State Historic Park General Plan and studied in the State Park's Bridge Feasibility Study, the bike and pedestrian bridge was never environmentally cleared. Support for the Los Angeles State Historic Park bike and pedestrian bridge would otherwise be provided as part of the proposed Project. Accordingly, the proposed Project is furthering the bike and pedestrian bridge by providing the necessary environmental clearance and support for the bridge. As discussed in Section 6.0, Design and Use Options, of the Draft EIR, as Use Option D would not include passenger access, it would not meet a majority of the proposed Project's objectives associated with the Chinatown/State Park Station. For example, Use Option D would not enhance community connectivity to the Los Angeles State Historic Park or provide comparable, affordable, and accessible fare opportunities for the community and Los Angeles State Historic Park, as the Chinatown/State Park Station is the closest in proximity to Los Angeles State Historic Park. Several comments on the Notice of Preparation requested an intermediate station closer to Chinatown to be located at the current Metro L Line (Gold) station to bring business into the commercial area and to offer another travel mode choice so as to alleviate parking problems in the area. It is also anticipated that, under the proposed Project, approximately 15 percent of passengers would access the Chinatown/State Park Station on game days or during events at the Los Angeles State Historic Park. However, under Use Option D, no station access would be provided to the core of Chinatown, the Mission Junction neighborhood, or the Los Angeles State Historic Park. Further, the Chinatown/State Park Station as a non-passenger junction under Use Option D would not enhance transit access to surrounding communities, including the Park, Chinatown, Mission Junction including William Mead Homes, Los Angeles River, and North Broadway. As such, if the Chinatown/State Park Station were to operate as a non-passenger junction under Use Option D, it would not provide transit benefits to the public.

Comment S4-3 Finally, due to the Stadium Tower’s proximity to Caltrans right-of-way and the direct aerial crossing of SR-110, the project will require extensive collaboration with Caltrans staff for various permits and design approvals. These reviews, approvals, and encroachment permits will be conducted at the time of permit application so that all concerns can be adequately addressed. If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2020-04095.

Sincerely,

MIYA EDMONSON
IGR/CEQA Branch Chief

cc: State Clearinghouse

Response S4-3 As discussed in Section 1.0, Introduction, of the Draft EIR, and Topical Response D, Metro is the Proper Lead Agency for the Proposed Project As the Region’s Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies, Caltrans is a responsible agency for the proposed Project and, as discussed in Section 2.0, Project Description, of the Draft EIR, the Project Sponsor will seek review and approval from Caltrans for any required permits or approvals for the proposed Project. Metro appreciates Caltrans’ willingness to collaborate with Metro on the proposed Project.

Comment Letter S5 – Gabrieleno/Tongva San Gabriel Band of Mission Indians

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to S5

Comment S5-1 We are writing this letter out of extreme concern for the proposed LA Gondola Project. The building of the Gondola will greatly impact current open space, disturb wildlife and cause disruption at LA Historic Park. Our tribal council and local Gabrieleno Tongva Community are against this project.

Response S5-1 This comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. The Draft EIR analyzed Tribal Cultural Resources in Section 3.18, Tribal Cultural Resources. Metro consulted with California Native American Tribes as required by CEQA in accordance with Assembly Bill 52, including the Gabrieleno/Tongva San Gabriel Band of Mission Indians. Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of the Final EIR for discussion of how impacts to biological resources from construction and operations of the proposed Project would be less than significant, including in the Los Angeles State Historic Park. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the Park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the Park. Further, through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms. Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems,

discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities.

Comment S5-2 As a tribe, we have very little space within Los Angeles County to gather as community and to enjoy outdoor space. Unfortunately, the capitalistic opportunity will cause more than disruption, but it will also further damage to Mother Earth and our natural world environment.

Response S5-2 As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts, including to the Los Angeles State Historic Park. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice by considering the proposed Project's ability to reduce congestion and emissions from on-road vehicles in an area disproportionately burdened by pollution, and including an analysis of the proposed Project's potential impacts to the surrounding community, concluding that the proposed Project could result in air quality benefits for the surrounding communities. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. The proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements and first/last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, for discussion of the Project Sponsor and donation to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project.

Comment S5-3 We ask you to please stop the project. The traffic, and unnecessary construction that will further the damage to our planet will not improve our lives, traffic conditions or lives as Angelino's. This proposal is just another poorly short-sighted business venture that will leave our city and county in a worse situation than what we are currently experiencing.

Sincerely,
Kimberly M. Johnson
Tribal Secretary.

Response S5-3

Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at Los Angeles Union Station (LAUS), Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. In addition, refer to Section 2.01, Overview of the Project, of the Draft EIR, discussing how the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, Project Description, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. As discussed in Sections 3.01, Aesthetics, 3.04, Biological Resources, 3.05, Cultural Resources, 3.06, Energy, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.13, Noise, 3.15, Public Services, 3.16, Parks and Recreational Facilities, 3.17, Transportation, 3.18, Tribal Cultural Resources, 3.19, Utilities and Service Systems, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would have less than significant operational impacts. Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Comment Letter L1 – Evelyn Aguilar

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to L1

Comment L1-1 South Coast AQMD staff received the Draft Environmental Impact Report (Draft EIR) for the Proposed Los Angeles Aerial Rapid Transit Project (South Coast AQMD Control Number: LAC221018-05). Staff is currently in the process of reviewing the Draft EIR. The public commenting period is from 10/17/2022 – 12/16/2022.

Response L1-1 This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Response L1-2.

Comment L1-2 Upon review of the files provided as part of the public review period, I was able to access the Draft EIR and associated Appendices on METRO's website.

Please provide an electronic copy of any live modeling and emission calculation files (complete files, not summaries) that were used to quantify the air quality impacts from construction and/or operation of the Proposed Project as applicable, including the following:

1. CalEEMod Input Files (.csv files);
1. Live EMFAC output files;
1. Any emission calculation file(s) (live version of excel file(s); no PDF) used to calculate the Project's emission sources;
1. AERMOD Input and Output files, including AERMOD View file(s) (.isc);
1. HARP Input and Output files and/or cancer risk calculation files (live version of excel file(s); no PDF) used to calculate cancer risk, and chronic and acute hazards from the Project;
1. Any other files related to post-processing done outside of AERMOD to calculate pollutant-specific concentrations (if applicable).

You may send the above-mentioned files via a Dropbox link in which they may be accessed and downloaded by South Coast AQMD staff by 10/27/22. Without all files and supporting documentation, South Coast AQMD staff will be unable to complete a review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.

If you have any questions regarding this request, please contact me.

Thank you,

Evelyn Aguilar

Air Quality Specialist, CEQA-IGR
Planning, Rule Development & Implementation
South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765
Phone: 909-396-3148
E-mail: eaguilar@aqmd.gov

Response L1-2 Documents responsive to this request were provided to the South Coast Air Quality Management District on October 28, 2022.

Comment Letter L2 – City of Los Angeles, City Administrative Officer

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to L2

Comment L2-1 I am writing to comment on the Draft Environmental Impact Report (DEIR) that Metro released on the Aerial Rapid Transit Project. Specially, I am informing Metro that the properties at 901 and 903 North Main Street, Los Angeles, California, 90012 (Assessor's Parcel Number [APN] 5408-008-909) are owned by the City of Los Angeles (City) and were approved for mixed use development -- affordable housing and services -- by the Mayor and City Council in August 2019 (Council File Number: 18-0930).

Response L2-1 This comment provides a general introduction regarding the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses L2-2 through L2-3. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for a discussion of how the Homeboy Industries' anticipated housing project at 903 North Main Street was considered a related project in the Draft EIR, and accordingly the proposed Project's Alpine Tower's location considered and avoided the anticipated 903 North Main Street Homeboy Industries' housing project. The proposed Project does not impact Homeboy Industries' anticipated housing project.

Comment L2-2 The Los Angeles Housing Department currently has an Exclusive Negotiation Agreement (ENA) with Friends of Homeboy, LLC, for these properties and expects to execute the Development and Disposition Agreement no later than June 2023. The plan for these sites includes transitional housing and affordable housing with supportive services, and a community center. Because of these facts, the City does not intend to divest itself of these parcels for any use besides providing affordable housing.

Response L2-2 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing for a discussion of how the proposed Project does not impact Homeboy Industries anticipated housing project. As detailed in Topical Response E, development of housing is constrained on the portion of 901 North Main where the proposed Alpine Tower would be located due to the proximity to the Metro L Line (Gold) tracks. The proposed Alpine Tower would be located on a triangular portion of 901 North Main Street between the Metro L Line (Gold) tracks and Alameda and Alpine Streets, and this property was previously analyzed by the City of Los Angeles' City Administrative Officer, describing it as unsuitable for housing. Specifically, the City recognized that the 901 North Main Street "site is bisected by overhead tracks, which are protected by an easement to" Metro and therefore "the Metro tracks will affect the ability to develop on the site." According to the City's publicly available property information system, ZIMAS, development and

construction projects on 901 North Main Street must consult with Metro pursuant to Metro's Adjacent Development Review process to ensure safety and avoid conflicts to transit services and operations. The process applies to work within 100 feet from Metro right-of-way, which affects most or all of the 901 North Main Street property.³ In addition, compliance with Metro's requirements for construction design in locations adjacent to Metro's systems further restricts the ability for development on the portion of 901 North Main Street between the Metro L Line (Gold) tracks and Alameda and Alpine Street.

Comment L2-3 Thank you for your immediate attention to this matter. If you require additional information, please contact Assistant City Administrative Officer, Yolanda Chavez, at 213-473-7522 or Yolanda.Chavez@Lacity.org.

Sincerely,

MATTHEW W. SZABO
City Administrative Officer

cc: Mayor Karen Bass
Councilmember Eunisses Hernandez, District 1
Los Angeles Housing Department

Response L2-3 This comment provides a general conclusion regarding the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses L2-1 through L2-2.

³ The 903 North Main Street property is also located within this area, according to ZIMAS. City of Los Angeles. 2023. ZIMAS. Available at: <https://zimas.lacity.org/>. Accessed August 2023.

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