

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

December 2023



State Clearinghouse No. 2020100007

VOLUME IV

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Comment Letter P601 – Lauren Woodrow

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P601**Comment P601-1** Deputy Executive Officer Cory Zelmer,

I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). I'm a resident of the Dodger stadium neighborhood and know the current traffic patterns well. It isn't great, but this proposal only seems to benefit Gondola investors hoping to make a profit from the Gondola itself or future related developments. Any claims of alleviating traffic or helping the surrounding communities are a sham.

Response P601-1 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. 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. 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. 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. 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. Refer to 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 for a discussion of how the proposed Project solely proposes an aerial gondola system. 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. Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data.

Comment P601-2 The idea that funneling traffic into Chinatown to solve current traffic jams isn't sound. It is simply relocating the traffic to an already congested area. The streets around Union station are already jammed, especially during commuting hours. Dodger games and concerts coincide with the evening commute for so much of the year that this traffic seems likely to be worse than current conditions.

Response P601-2 Refer to Response P601-1 for discussion of how the proposed Project would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. 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 the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Comment P601-3 The development of a Gondola will burden Chinatown, a community already struggling with gentrification, with additional rent hikes and elderly displacement. Not to mention the prospect of new commercial and luxury residential developments that are likely to follow the Gondola, further pushing out current residents.

Response P601-3 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how 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. The proposed Project would provide an additional transit option for surrounding residents in Chinatown, and as discussed in Section 3.14, Population

and Housing, of the Draft EIR, is not anticipated to substantially generate new development.

Comment Letter P602 – Naoko Ward

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P602

Comment P602-1 Deputy Executive Officer Cory Zelmer,

I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P602-1 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. 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 P602-2 The gondola will only lead to further gentrification of Chinatown, harming the elders who have lived there for years. The community does not want this.

Response P602-2 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how 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. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, directly led the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements.

Comment Letter P603 – Alexandra Abdel-Malek

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P603

Comment P603-1 Deputy Executive Officer Cory Zelmer,

Good afternoon, I'm writing to ask that you vote against the Los Angeles Aerial Rapid Transit Project ("The Gondola") at Dodger Stadium

Response P603-1 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. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

Comment P603-2 This project would displace traffic from Dodger Stadium by placing the burden and environmental on residents of Chinatown. This would disrupt the community and is a huge waste of time and resources for something that doesn't truly count as public transit. In reality we need serious investment in public transit across Los Angeles County in order to ease our massive traffic problem.

Response P603-2 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 the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project’s Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project’s stations.

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 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. 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. 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.

Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating 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.

Comment P603-3 This project will also cause a spike in housing costs, displacement, and gentrification in Chinatown, whose residents need more housing security, not less.

Response P603-3 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how 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.

Comment Letter P604 – Paul Guijarro

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P604

Comment P604-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P604-1 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. 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 P604-2 The proposed gondola's station in front of one of our most historic and beautiful buildings, Union Station, will be completely blocked from all viewing angles from the Pueblo and from Alameda St. This is unacceptable. No structure should block views of Union Station or the Historic Pueblo.

Response P604-2 Refer to Section 3.05, Cultural Resources, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR), of the Draft EIR for a discussion outlining the proposed Project's potential construction and operational impacts to the Los Angeles Union Station Passenger Terminal and Grounds. As discussed in Section 3.05, Cultural Resources, of the Draft EIR, Los Angeles Union Station (LAUS) was designed in response to its proximity to El Pueblo de Los Angeles. As such, one aspect of LAUS' setting that is important is its axial connection and visual relationship with the Los Angeles Plaza Historic District. The proposed Alameda Station would be located over 100 feet north of the main axis—at the intersection of Los Angeles Street and Alameda Street—between LAUS and the Los Angeles Plaza Historic District. The location is sufficiently offset so it would not interrupt the physical and visual relationship between the two historical resources. This important aspect of the LAUS' setting would be maintained.

Comment P604-3 Don't fuck up the area around the Historic Pueblo, Union Station and the LA Historic State Park with a gondola that would just be visual and actual blight. Build a subway from union Station to Dodger stadium instead, just like New York City has a dedicated short subway line between Times Square and Grand Central Station.

Response P604-3 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, which would be less than significant. 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. 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.

Comment P604-4 Do not allow the gondola to be built.

Response P604-4 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. 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 Letter P605 – Nina Kagan

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P605

Comment P605-1 I am writing today to voice my strong opposition to the LAART project as a representative of the Crenshaw/Slauson community. I, Nina Kagan, will be impacted by this project for a wide array of reasons.

Response P605-1 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. 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 P605-2 through P605-9.

Comment P605-2 My primary concern of this project is it's exceptional cost and few benefits for the vast majority of metro riders. As someone who frequently uses the expo, red and purple lines, I feel like it is ridiculous to focus energy on a project that serves exclusively dodgers stadium, because it does so little to incentivize average commuters to use public transportation. If anything, the project looks to push traffic for Dodger's Stadium outside of the area into surrounding areas, while providing no feasible utility for most people, who want to get from home to work with ease.

Response P605-2 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). 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. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less. 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 Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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. 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, and the ridership forecasts of the proposed Project, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce traffic volumes destined to 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. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P605-3 I've taken metro for the past decade, and although bus systems have gotten marginally better over time, the infrequencies of service on important routes (Vermont for example) make connecting between the city difficult and inconvenient. The goal of our cities infrastructure should be to get people where they need to be safely, affordably, and environmentally soundly.

Response P605-3 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 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. 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. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is consistent with RTP/SCS, this as 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, and would otherwise reduce greenhouse gas emissions by reducing VMT. Also 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/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 include mobility hubs at Chinatown/State Park Station and Dodger Stadium Station. Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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. 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 safety features of the proposed Project. 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.

Comment P605-4 The proposed project will be visually distracting in the overall skyline,

Response P605-4 Refer to Section 3.01, Aesthetics, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant, including to scenic vistas. As analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline. As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted and the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant.

Comment P605-5 and will bring more tailpipe emissions into communities, with new drivers (WHICH PUBLIC TRANSPORTATION SHOULD BE ELIMINATING).

Response P605-5 Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model and how the proposed Project would reduce vehicle miles traveled. The lifetime emissions of the proposed Project over the useful life of the project would be a reduction of 166,653 MT CO₂e. The lifetime VMT reduction of the 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.

Comment P605-6 This project does little to support the mobility of the public, and quite honestly it's an offensive reminder of the failure of the city to build the affordable housing project Elysian Park Heights on the land that the Dodger's stadium now sits on.

Response P605-6 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 also 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 E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine.

Comment P605-7 Why should I as a taxpayer be forced to foot the bill for something so overtly offensive to me? I've put up with getting screamed at, harassed and watched people openly smoke crack on the Red Line, and yet I continued to take transit, because I found something positive in the lack of emissions public transit options offer in comparison to driving.

Response P605-7 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of how comparable urban aerial transit systems have been shown to reduce violent crime in nearby areas. 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.

Comment P605-8 Metro should be transparent in their policies. If you don't care about poor people that's horrible but not surprising. What is offensive is asking us to foot the bill so you can show rich people what your city has to offer to rich clients by the time the 2028 Olympic bid rolls around. It's ridiculous, it's shady and it's downright evil.

Response P605-8 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment P605-9 No metro projects should go forward without community input PERIOD.
Please cancel this project,

Response P605-9 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. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment Letter P606 – Rachel Sumekh

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P606

Comment P606-1 Hi,

I am a part of the LA28 Olympics Creator group. I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). This won't reduce traffic or greenhouse emissions. We need so many projects in LA, this isn't one.

Response P606-1 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 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 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 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. Refer to Section 2.1, 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.

Comment Letter P607 – Victoria Steele

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P607

Comment P607-1 Thank you for the opportunity to comment on a project that will affect those of us who live in Chinatown. Attached is a PDF version for your convenience. I am a resident of Metro@Chinatown Senior Lofts and have been a Metro rider for decades. My main concerns are as follows:

Response P607-1 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 P607-2 through P607-20.

Comment P607-2 Privacy

The gondola will be going over or near residential areas, allowing a view of outdoor community areas in apartment complexes and the backyard of homes, hopefully not through windows or skylights. Those who like to take photographs or shoot video will do so. These photographs and videos could then be posted on social media.

Fogging the windows will frustrate those who want to take photographs and expect to be able to do so. Not fogging the windows will eliminate privacy for residents. This transit system should never be built over or near current residential areas.

Trust is a big issue these days. People with authority say something one day, only to be proven to be liars months later. You say that you will fog the windows when near apartment buildings and houses. But will you do so if tourists with cameras are willing to pay \$30 for a ride? Once you have your system built, will you keep your promises?

Response P607-2 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. The proposed Project would be located in a densely-populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and as discussed in Topical Response M, Comparable Urban Aerial Transit Systems, modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, Gondola Design and Operations, of the Final EIR, and 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. 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.

Comment P607-3 Aesthetics

The modern station design is not appropriate when in the vicinity of historic buildings such as Union Station and those at El Pueblo. The birthplace of our city deserves more respect than this.

Response P607-3 The Draft EIR fully analyzed and addressed the proposed Project’s potential impacts to historic resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR’s analysis concludes that all potential impacts related to historical resources would be less than significant. 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 Los Angeles Union Station and El Pueblo, which would be less than significant. As discussed in Section 3.01, Aesthetics, of the Draft EIR, the proposed Project’s Alameda Station is in an urban area that currently has a mix of architectural styles, building materials and colors, as well as a mix of primarily traditional and some modern style buildings. As discussed in Section 2.0, Project Description, of the Draft EIR, 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. 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 would also 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 extend view corridors between the proposed Alameda Station and existing development in a way that creates an observed visual unity.

Comment P607-4 The drawings of the Chinatown Station were not adequate to give a good sense of what the area will look like. The Gold/L Line Station has a Chinese theme which is appropriate for the area. It looks like the gondola is encroaching too much into the park. The park is a celebration of nature and of history. The gondola is neither.

Response P607-4 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 Los Angeles State Historic Park, which would be less than significant. 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. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including additional simulations of the Park. 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. As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, 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. Landscape Unit (LU) 3, where the Chinatown/State Park Station would be located, currently has a mix of architectural styles and building materials and colors, including traditional Chinese architecture within the adjacent Chinatown community. The Chinatown/State Park Station would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and the design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. In addition, the new amenity building intended for use by LA ART riders and park visitors alike was designed to reflect the scale and materiality of the existing visitor amenity buildings located within the Los Angeles State Historic Park. Further, the pedestrian access enhancements in LU-3 between Metro's L Line (Gold) Chinatown Station and the Chinatown/State Park Station would acknowledge the visual character of existing park amenities. For example, the hardscape and landscape improvements, shade structures, and potential seating would incorporate design features that would establish a unifying and cohesive design consistent with the overall character of the existing structures within LU-3.

Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the location and design of the Chinatown/State Park Station. 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. Refer to Topical Response F, Los Angeles State Historic Park, and Responses to S2 for discussion of how, 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.

Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. The design for the proposed Project's stations and junction studied in the Draft EIR would provide an opportunity for site specific artwork that is reflective of the unique neighborhood culture and could be commissioned from local artists. In addition, the proposed Project's cabins could feature artwork from local artists or other community programming.

Comment P607-5 The design of the gondola may look fine in a more modern community but it does not in the older, historic parts of downtown.

Response P607-5 Refer to Responses P607-3 and P607-4 for discussion of how 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.

Comment P607-6 Other considerations

The lighting should not shine into any home or apartment.

Response P607-6 As discussed in Section 3.01, Aesthetics, of the Draft EIR, the Project area is a developed, urban area with a high amount of existing ambient lighting. The high levels of ambient lighting exist due to vehicular and pedestrian street lighting, building security lighting, outdoor landscaping lighting, and lighting along and adjacent to the various dedicated transit guideways traveling to Union Station, such as the elevated Metro L Line (Gold). In addition, high levels of ambient lighting are exhibited from vehicle and truck headlights traveling on streets and the SR-110. Cathedral High School currently has high-poled sports field lighting visible from North Broadway, Los Angeles State Historic Park, and area residents when in use. Dodger Stadium has

extensive television quality sport field lighting in use during games and special events. Large special events which occasionally occur at the Los Angeles State Historic Park can also generate high levels of lighting. Project lighting would include low-level lighting for security and wayfinding purposes adjacent to and within the stations, junction, and 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 mobility hubs would be installed at the stations, junction, and towers. Lighting would also be provided underneath the elevated stations and junction. As such, operations of the proposed Project would result in a less than significant impact on light and glare. In addition, Refer to Topical Response K, Signage and Lighting, for discussion of the proposed Project's signage and lighting.

Comment P607-7 The Need

Is there truly a need for this project? How many people are standing in line to wait for the next express bus? Are the buses too crowded and do many people have to stand? Do some people give up and leave? Are some late in getting to the game?

Response P607-7 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. 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. 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. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of how travel times for the Dodger Stadium Express are three to seven times the seven-minute travel time on the proposed Project. The Draft EIR concluded that 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 proposed

Project substantially more competitive with driving time than the current Dodger Stadium Express (see Draft EIR page 4-63, page 4-71). After a game, travel times on the Dodger Stadium Express 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. Regarding the queue waiting time, Dodger Stadium Express riders today wait in queues to board the service. 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 would have more static queues that would build over time as departure frequency would be substantially less frequent than the proposed Project.

Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express 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. 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.

Comment P607-8 These are the people that you will be serving. They would just be changing from one form of public transit to another. Many others will try the gondola. It is a novelty. But will they continue riding it indefinitely?

Response P607-8 Refer to Response P607-7 for an overview of the need for the proposed Project. Refer to Table 3.17-4 on page 3.17-35 of Section 3.17, Transportation, of the Draft EIR for the ridership forecasts. The proposed Project is expected to generate from 3,830 to 13,030 regular riders per day, depending on the year and whether there is a game or event at Dodger Stadium. Additional information and assumptions regarding the ridership forecasting that feeds into the VMT analysis can be found in Appendix N of the Draft EIR.¹ Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N,

¹ Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.

Transportation Appendices of the Draft EIR. 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.

Comment P607-9 This project is not about how many people the gondola can carry each hour, but how many people want to use it on a regular basis. Since it will be disruptive to Chinatown due to increased traffic on narrow streets, decreased available parking, and a probable loss of privacy, the need had better be proven.

Response P607-9 Refer to Response P607-8 for discussion of the ridership forecasts of the proposed Project, which were based on detailed analysis from Fehr & Peers which prepared Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR, including the ridership model, and intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts to transportation. The Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

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 the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the 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.

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. The proposed Project would be

located in a densely-populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, Gondola Design and Operations and 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. 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.

Comment P607-10 I am tempted to think that your modeling of future ridership is too optimistic. Your literature says that the project will remove 3000 cars from the road, but the UCLA study puts the number closer to 600.

Response P607-10 Refer to Response P607-8 for discussion of the ridership for the proposed Project. Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. 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.

Comment P607-11 With the large amount of parking available at the stadium and the desire of many drivers to drive there, the first priority should be to improve access to the parking lots and supply shuttle buses going up the hill before the games if practical.

Response P607-11 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express 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. 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.

Comment P607-12 Second, there should be a dedicated bus lanes both before and after the game. Since the gondola does not come to a full stop, some people may prefer the bus even if the gondola is built – handicapped, elderly, a parent with several small children, etc.

Response P607-12 Refer to Topical Response O, Response to the UCLA Mobility Lab Study, for a discussion of how the Dodger Stadium Express would not be precluded from operating by the proposed Project. While existing riders of the 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. 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 attendees of games or events at Dodger Stadium to ride public transportation. Refer to Response P607-11 for discussion of the Transportation Systems Management Alternative to the proposed Project. 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 safety features of the proposed Project and how the station boarding process and cabins would comply with all accessibility requirements of the Americans with Disabilities Act (“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 system capacity of the proposed Project. Pathways to 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.

Comment P607-13 There is also the possibility of direct bus service connecting to more remote locations or from other directions. Is there any need for bus service to Elysian Park hours before the game?

Response P607-13 Refer to Response P607-11 for discussion of the Transportation Systems Management Alternative to the proposed Project. As discussed in Topical Response H, a system of buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events 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 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. For example, the current Dodger Stadium Express service from South Bay serves a broad area of southern Los Angeles County at stations spread across eight miles, is free, and travels on a priority lane within the I-110 freeway median for most of its trip, but the South Bay Dodger Stadium Express 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.

Comment P607-14 A Further Note The Los Angeles State Historic Park does not need the gondola. It has the Gold/L Line. It does need a bridge across the tracks at the northern portion of the park. This is a need. It is not directly related to the gondola and would be at the bottom of the list of priorities for its construction.

Response P607-14 Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how the proposed Project's intermediate Chinatown/State Park Station near the southernmost entrance to the Los Angeles State Historic Park would be located within a short walk to many Chinatown businesses and Metro's L Line (Gold), creating a stronger connection with the Metro L Line and enhancing transit access to the Los Angeles State Historic Park, Mission Junction, William Mead Homes, and the Los Angeles River. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less. 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.

Comment P607-15 Additional Comments

Metro should never divert money from the public transit system to the gondola since the route is short and few riders would benefit. At this time, it did not sound like a possibility but things can change.

Response P607-15 Refer to Response P607-7 for discussion of the purpose and need for the proposed Project. Refer to Topical Response A, SB 44, for discussion of how the proposed

Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. 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. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing of the Final EIR, which 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P607-16 I assume that none of the structures build for the gondola system will disrupt the view of the stadium fireworks for any of the surrounding communities. Is this true?

Response P607-16 To the extent communities near the Dodger Stadium property have a view of the Dodger Stadium fireworks, it is not anticipated the proposed Project would disrupt the view.

Comment P607-17 Please pay attention to what small business owners and managers are saying. I do not know how the increased traffic and competition for parking places will affect them and their regular customers. These businesses are important to the community.

Response P607-17 Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not displace businesses 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. Refer to Topical Response C, Project Features, for discussion of how during construction, 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 through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. Refer to Section 3.17, Transportation, of the Draft EIR, for discussion of the proposed Project's maintenance of local and emergency access during construction. 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 the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized

increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the 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. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. 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 Chinatown 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 Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment P607-18 I live in a senior building in Chinatown. The increased traffic should make it more difficult to find parking places. Seniors usually do not want to walk far or may not feel safe at night.

Response P607-18 Refer to Response P607-17 for discussion of traffic congestion and parking. Specifically as it relates to parking, 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. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world and their operations, integration with nearby residential and open space uses, community benefits, and evidence that such systems can reduce violent crime in nearby areas and promote a sense of security compared to other modes of public transportation.

Comment P607-19 There are many important issues examined in the report, such as geology and soil. I have some concern but am not knowledgeable enough to make comments. I will have to leave that to others.

Response P607-19 Refer to Section 3.07, Geology and Soils, of the Draft EIR, for discussion of how the proposed Project would have less than significant impacts related to geology and soils upon implementation of Mitigation Measure GEO-A.

Comment P607-20 There appears to be many good people who worked hard on this proposal, having listened to many of the concerns, and others who have studied it and prepared the report. I respect that. But I have seen too much corruption to fully trust in what I am told. Is this really needed? Thank you for all the effort that is going into the study of this proposed project. May you reach a wise decision.

Response P607-20 Refer to Response P607-7 and Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Comment Letter P608 – Yee Ting Huang

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P608

Comment P608-1 Hi there,

I live in Echo Park near Dodgers Stadium and do not want this project in our neighborhood. I really don't like the traffic during Dodgers games either, but a gondola is not the way to solve it. A gondola is a transit method to get a large amount of people somewhere over a long period of time. It sounds like you need a transit method that will get a large amount of people somewhere in a quick amount of time to fill the stadium. It doesn't make sense to me how this will achieve any benefit for us.

Response P608-1 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. 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. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations for a discussion of the proposed Project's passenger capacity and operations, including capacity to carry up to approximately 5,000 passengers per hour per direction (pphpd).

Comment P608-2 Solano Canyon, Elysian Park, and the State Park are also beautiful greenspaces that do not need gondola cabins cutting through to ruin that. It is already so hard to access greenspaces in LA, why tamper with the little we have already to give ourselves peace and tranquility?

Response P608-2 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. Refer to Section 2.0, Project Description, of the Draft EIR. The proposed Project alignment does not cut through Solano Canyon or Elysian Park. Refer to Section 3.01, Aesthetics and Appendix C, Visual Impact Assessment and Lighting Study, for analysis of how the proposed Project will have less than significant aesthetic impacts to Solano Canyon, Elysian Park, and the Los Angeles State Park.

Comment P608-3 I also understand the construction will *destroy* trees and local bat populations in and around the State Park. This is wrong.

Response P608-3 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 how the proposed Project is not anticipated to contribute to an increase in bat collisions relative to existing obstacles in the vicinity of the proposed Project. 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.

Comment P608-4 We are in a climate crisis and to destroy the environment for such an ill-informed idea is awful. Please just invest in proper transit. Expand the shuttle system to the gondola. Inform Dodgers game-goers to get there earlier. Anything but this.

Response P608-4 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, 3.16, Public Services, 3.17, 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. 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 Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. 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. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express 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.

Comment P608-5 I also understand you are not building any additional parking for this project. That means to board, people have to go to Union or College Station. So you're banking on existing transit-goers to use the gondola. Who would even do that? This is Los Angeles. Everyone knows the majority of us drive everywhere, and drive on gamedays. Do people really think they will stop driving to games just to take the gondola? That doesn't sound like any Angeleno I know. And I have lived here for 28 years.

Response P608-5 Refer to Section 3.17, Transportation and Appendix N, Transportation Appendices of the Draft EIR for detail regarding the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR.² Stantec is an internationally respected global design

² Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.

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. The average estimated ridership of the proposed Project (6,000 in 2026 and 10,000 in 2042) is greater than the average number of Dodger Stadium Express riders per game from LAUS (1,845³), so the majority of riders are expected to shift from other modes.

The existing Dodger Stadium Express bus service has grown its ridership 250% since it started operating in 2010 through the 2019 season,⁴ indicating quantified and increased demand for transit service between LAUS and Dodger Stadium. 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 attendees of games or events at Dodger Stadium to ride public transportation. In addition, as detailed on page 28 of the Appendix N, PDF, in the table titled LA ART MODE OF ACCESS DATA CONSIDERED AND ESTIMATED FUTURE MODE OF ACCESS, 8.6% to 26% of Dodger Stadium Express riders take a vehicle (park and ride or TNC) to access the Dodger Stadium Express. For a conservative analysis of parking demand, 27.6% of proposed Project riders are estimated to park and ride.

Comment P608-6 Another thing is, there is traffic coming from all sorts of directions throughout LA to get to Dodgers Stadium. I don't see this project proposed from Silver Lake or Angeleno Heights. Instead, it will be built on top of Chinatown where the population is largely elderly immigrants. This isn't right at all, and shows how misguided this project is.

Response P608-6 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. 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. The proposed

³ Los Angeles Dodgers. 2019. Dodger Stadium Express Rider Counts.

⁴ Los Angeles County Metropolitan Transportation Authority (LA Metro). 2021. Metro Final Report: MSRC Contract MS21001 Dodger Stadium Express 2019 Season. Available at http://www.cleantransportationfunding.org/sites/default/files/projects-final-reports-2020-04/MS21001_Metro_Dodgers_Final_Report.pdf. Accessed August 2023

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.

Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice and how the proposed Project supports Metro's goal of prioritizing equity opportunities. The proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment. The public outreach for the proposed Project was designed with environmental justice principles in mind. The proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution in an area disproportionately burdened by pollution, and improving safety. The proposed Project is also designed to be ADA compliant.

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.

Comment P608-7 Please, I too want the traffic to go down. Gamedays really mess with my local traffic as I'm just up the hill from Stadium Way, but this aerial gondola doesn't seem like it will address that at all. It's such an absurd idea.

Response P608-7 Refer to Response P608-5 for a discussion of the average estimated ridership of the proposed Project (6,000 in 2026 and 10,000 in 2042). Refer to Response P608-6 for an overview of the need for the proposed Project. 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.

Comment P608-8 I've seen the advertisements too. People seem to think it will be exciting to ride and that it will have low emissions. I too want to reduce my emissions when I'm stuck in

traffic, but if you don't build additional parking, aren't you just moving the emissions from our area to the Downtown and Chinatown areas? Making these already run down areas worse? I know I am lucky to live where I live so close to Elysian trails, but not everyone else is. And certainly people in more difficult living situations should not have that be made worse for them. Effectively, this project is a health hazard.

Response P608-8 Refer to Response P608-6 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. Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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.

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 the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

As discussed in Section 5.0, Corrections and Additions, of the Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park, the City's second largest park, comprising 575 acres, and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/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. 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 the proposed Project's features to enhance and provide additional benefits to the surrounding communities.

Comment P608-9 Oh, and aren't there only 80 home games in a year? So 285 days of the year, 78% of the year you want the gondola to run for no reason? Can you explain how Los Angeles

Metro, who we should trust to meet the people's needs for transit, to get to work, to get home— how did your experts decide this was a good idea? How do you justify this?

Response P608-9 Refer to Section 2.0, Project Description, of the Draft EIR, discussing how, 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 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. Refer to Section 2.6, Ridership, of the Draft EIR for a discussion of how 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. Refer to Response P608-6 for an overview of the need for the proposed Project.

Comment P608-10 Frankly, this injures my faith in our Metro system. I just don't understand how the project got this far.

Response P608-10 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 P608-11 Please, save the trees, save the bats, and leave our elders alone. Please think of something else.

Response P608-11 Refer to Response P608-3 for discussion of how 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, and how the proposed Project is not anticipated to contribute to an increase in bat collisions relative to existing obstacles in the vicinity of the proposed Project. Refer to Response P608-7 for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities, and how the Draft EIR addresses environmental justice.

Comment P608-12 I do not want this LA ART Gondola. I want better for all of this.

Response P608-12 This comment indicating opposition to the proposed Project 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 Letter P609 – Brian Smee

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P609

Comment P609-1 Hi,

I'm a resident in Solano Canyon and want to voice that I do not support the construction of the proposed Gondola in any way.

Response P609-1 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. 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 P609-2 Build a bridge from Broadway to the park instead for crying out loud. Surely there's a better way to spent \$300 million than a vanity project gondola.

Response P609-2 Refer to Section 6.0, Design and Use Options, of the Draft EIR for discussion of Design and Use Option E, Pedestrian Bridge at the Los Angeles State Historic Park. While the pedestrian bridge from North Broadway to the central portion of the Los Angeles State Historic Park is not proposed as part of the proposed Project, the Draft EIR includes analysis of the pedestrian bridge for the Los Angeles State Historic Park thus providing environmental clearance for the bridge. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No sources of funding have been sought or committed to the proposed Project. 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. 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. 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. 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 P610 – Nadia Taha

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P610

Comment P610-1 Dear Mr. Zelmer,

I live at the top of the hill where Chinatown meets Echo Park, right up against Dodger Stadium. My neighborhood is most impacted by the traffic on game days and during events, and will be most impacted by the proposed LA ART.

Response P610-1 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. 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.

Comment P610-2 I am ardently opposed to it, for a myriad of reasons. Chief among them is that this project is exorbitantly costly, and those funds would be better spent improving our existing infrastructure, including bus/bike lanes. Developing an entirely new transportation system from scratch is an unreasonably expensive proposition when compared to making improvements to the existing transit modes. That the project proposes to make up some of that expense by charging passengers -- when the shuttle busses from Union Station are free -- underscores how unwarranted and reckless this added cost is.

Response P610-2 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. Refer to Topical Response L, Project Sponsor and Section 4.0, Costs and Financing, of the Final EIR, which 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response C, Project Features,

for discussion of how 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 P610-3 What's more, this project as proposed is a ruthless intrusion into residents' lives. Between the lack of transparency around the ownership, bidding process and eventual operation of the project and the potential for advertising, lighting and other visual assaults to become overhead fixtures in our neighborhood, the entire prospect is unwelcome.

Response P610-3 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. 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. This comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Topical Response K, Signage and Lighting for discussion of how the proposed Project's Sign Concept Plan included at Appendix B of the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR, provides that across the entire proposed Project, including stations, the junction, towers, and cabins, the proposed Project is proposing static signage and 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. 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 Project lighting would include low-level lighting for security and wayfinding purposes. 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. The proposed Project would be located in a densely-populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses.

Nevertheless, as discussed in Topical Response J, Gondola Design and Operations and 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. 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.

Comment P610-4 Please heed the local community opposition and invest in improving our existing transit options instead!

Response P610-4 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. Refer to Response P610-7 for an overview of the need for the proposed Project. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express 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. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how 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.

Comment Letter P611 – Alan Pena

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P611

Comment P611-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). I do not think this is a safe project to build.

Response P611-1 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. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world that operate safely, efficiently, and in concert with nearby residential and open space uses. Refer to Response P611-2 for discussion of the proposed Project's safety features.

Comment P611-2 What if it falls on top of the people below? I do not see safety plans in place that will prevent this. And what happens if it stops and people get stuck inside? How will you escape? How long will it take for help to get there in time? And what if you are stuck inside and you need to use the bathroom?

Response P611-2 Refer to Topical Response J, Gondola Design and Operations, for discussion of how the Emergency Operations Plan for the proposed Project would include emergency response protocols and safety procedures developed in conjunction with the operator, system provider, and local authorities. 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 would 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.

Comment P611-3 The Gondola will mess with the birds flying through the area too and we need our natural animals and birds populations.

Response P611-3 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 how the proposed Project would not result in significant impacts to bird populations or to special status species. 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. 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. 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.

Comment P611-4 I think you should build more buses and trains and subways instead. You are Metro, not LAX.

Response P611-4 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express 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. 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. Aerial rapid transit technology has the ability to overcome grade and elevation issues between LAUS and Dodger Stadium in order to provide a direct transit connection between the two locations, and provide 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.

Comment Letter P612 – Gabriela Davidson-Gomez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P612

Comment P612-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P612-1 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. 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 P612-2 I am an Environmental Studies student at Loyola Marymount University and I am concerned about this project's likelihood to break up historic neighborhoods like Chinatown and displace residents, which would contribute further to gentrification in which Angelenos can no longer afford rent in the neighborhoods where they have roots. I am against this project because transit options should be implemented to benefit the communities they are placed in, rather than pushing longtime residents out in order to bring in outsiders for sports events.

Response P612-2 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how 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. 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. 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. 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 P612-3 The community was never consulted about this project and it is irresponsible to move forward without the community getting to lead the process, because this project prioritizes making money from visitors and is not at all based on what local communities (where the impacts will be greatest) need or want.

Response P612-3 Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, and Appendix A, Scoping Report, of the Draft EIR, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Metro engaged stakeholders in neighborhoods along the proposed Project alignment in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from stakeholders in neighborhoods along the proposed Project, including Chinatown, during this period led directly to changes to the proposed Project, including selecting the proposed Project's alignment and the location of Chinatown / State Park Station, as discussed in Section 5.0, Other CEQA Considerations, of the Draft 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. 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. Refer to Section 2.1, 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. 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. As summarized in the Executive Summary to the Draft EIR, operational impacts from the proposed Project would be less than significant.

Comment P612-4 Furthermore, a UCLA study found that the gondola will not reduce environmental impacts *nor* traffic in the area. In fact, it will displace greater vehicle emissions into areas served by the gondola, which are already unjustly burdened with pollution.

Response P612-4 Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. 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.

Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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. 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, and the ridership forecasts of the proposed Project, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce traffic volumes destined to 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.

Comment P612-5 There are other ways to develop effective public transit and I strongly oppose moving forward with this project that will not have foreseeable traffic, environmental, or social benefits, and may actively harm communities in the affected area, whom were not consulted in the process.

Response P612-5 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 Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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. 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. 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.

Comment P612-6 It would be more prudent to spend this money on transit projects planned in coordination with community members, which would best serve Angelenos. Thank

you for your time reading and I sincerely hope you will incorporate the concerns of local community members into this and future projects.

Response P612-6 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, Section 4.0, Costs and Financing, of the Final EIR which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment Letter P613 – Ned Teitelbaum

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P613

Comment P613-1 *The plan for the Gondola won't reduce congestion or pollution because it will increase, not reduce, the number of cars coming into the area. It will attract huge numbers of people wanting to ride the Gondola to the stadium, most of whom won't be taking transit, and turning Chinatown into a parking lot for Dodger Stadium.*

Response P613-1 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 Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. 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. 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 the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the 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.

Comment P613-2 *In addition, **the Gondola will detract from the enjoyment of the Los Angeles State Historic Park, which was fought for by the communities in the area, and would cause those who use the Park to feel boxed in and surveilled from above.*

Response P613-2 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. 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. Refer to Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, for discussion of how cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views.

Comment Letter P614 – Xavier Flores

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P614

Comment P614-1 With the estimated construction period of two years, if construction starts in 2025, the LA ART System could start working in time for the 2028 Los Angeles Olympics.

Response P614-1 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 Letter P615 – Bella Martinez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P615

Comment P615-1 The LA ART Proposal offers the capacity to move approximately 5000 people per hour each way using a technology that is quiet, safe and environmentally friendly, proven to have zero emissions.

Response P615-1 This comment is noted for the record 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 Letter P616 – Vicky Barahona

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P616

Comment P616-1 It will be easier to carry everybody, reduce traffic, very interesting.

Response P616-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment P616-2 it will prevent people from parking in this area and it will attract tourists, very good experience.

Response P616-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P617 – Guadalupe Vasquez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P617

Comment P617-1 This is a perfect project, it is about fewer cars, less pollution and safer and healthier neighborhoods. I support the Dodger Stadium Gondola

Response P617-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P618 – Aracely Martinez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P618

Comment P618-1 The ART is a proposal for aerial transit gondolas that could link the Los Angeles Union Station with the Dodger Stadium. The commute is one mile long. It takes approximately 7 minutes.

Response P618-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P619 – Arturo Perez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P619

Comment P619-1 Very good project. It will benefit us, much less traffic.

Response P619-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P620 – Carlos Sanchez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P620

Comment P620-1 I support it because it is free for us who live in the area, and not only that, but it will also take less time than the bus. The bus takes between 35 to 45 minutes and the cable car or gondola just takes 7 minutes.

Response P620-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. 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 P620-2 Please approve it.

Response P620-2 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P621 – Vilma Medre

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P621

Comment P621-1 I like it and support it because it does not pollute, and since it will reduce traffic, I will be able to get home faster after work.

Response P621-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P622 – Saul Cruz

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P622

Comment P622-1 I like the project because there won't be so much traffic anymore during game days, it will be easier to move around and very quick, just 7 minutes to get to the stadium.

Response P622-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P623 – Norma Ramirez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P623

Comment P623-1 Because it will reduce traffic, that is always the problem here in [illegible] Blvd.

Response P623-1 The proposed Project’s ability to reduce vehicular travel is discussed in Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR. The proposed Project would improve mobility and accessibility for the region by connecting Los Angeles Union Station (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. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. By providing efficient, high-capacity, and faster alternative access to Dodger Stadium for games and special events, overall vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days would be reduced by the proposed Project because of game/special event attendees shifting to riding public transit rather than driving to Dodger Stadium.

Comment P623-2 I have been living here for 22 years and every time there is a game, we have the same problem, a lot of traffic.

Response P623-2 Refer to Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Response P623-1 for a discussion of how 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.

Comment Letter P624 – Jesus Ruiz

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P624

Comment P624-1 I support it, but I have a question, why has it taken so long? Ten years ago already I had heard of this project but it hasn't been built yet, we would have spent a lot of time without so much pollution.

Response P624-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. The proposed Project is currently undergoing environmental review under the California Environmental Quality Act. Refer to Section 2.10, Required Permits and Approvals, of the Draft EIR for discussion of how the proposed Project requires discretionary entitlements, reviews, and approvals from the California Department of Transportation, California State Parks, California Division of Occupational Safety and Health, Metro, and the City of Los Angeles.

Comment Letter P625 – Katherine Rivera

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P625

Comment P625-1 Make this project happen so I can attend more Dodger games. Coming from the City of West Covina it is a long drive. I can park and use gondola for my convenience.

Response P625-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P626 – Adrian Montoya

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P626

Comment P626-1 Big Dodger fan so it will be nice to not drive in traffic and be able to get driven to the games. I am all for the gondola so that will be awesome idea. Im all for it!

Response P626-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P627 – Luis Olalde

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P627

Comment P627-1 Have many family members including me to be Dodger fans. It will be nice to sit back and not drive to the games. We can take the gondola back and forth to every game we go to.

Response P627-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P628 – Mary Mares

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P628

Comment P628-1 I have been a Dodger fan for many years and I think this will be a great idea for many people. Knowing how much traffic there is going to the games.

Response P628-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P629 – Yvonne Montoya

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P629

Comment P629-1 Convenient and a great idea, I have been a dodger fan since I was young.

Response P629-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P630 – Danielle Montoya

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P630

Comment P630-1 When people are handicap it will great use for them and very convient. The senior people need to be considered.

Response P630-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P631 – Elizabeth Urrutia

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P631

Comment P631-1 Considering I’m over the age of 75 it will be ideal for this and bring more people to the stadium.

Response P631-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P632 – Celeste Savor

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P632

Comment P632-1 I a support Gondala for several reasons it make for parking problems and improve traffic going to the stadium.

Response P632-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P633 – Norma Robles

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P633

Comment P633-1 I support the gondola because it will help reduce traffic in the area and make it a lot easier for people to get to the Dodger games

Response P633-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P634 – Tina Robles

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P634

Comment P634-1 It will benefit low-income people who take public transportation to Dodger Stadium and other places around that are historic monuments.

Response P634-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P635 – Geraldine Foye

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P635

Comment P635-1 I am definety for the Gondola as it will be easier to attend a game at Dodger Stadium.

Response P635-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P636 – Elida De Anda

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P636

Comment P636-1 I love to go to Dodger games And it will be good not to Drive

Response P636-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P637 – Emma Aguilar

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P637

Comment P637-1 I no longer drive + it will be nice to g on gondola to China town

Response P637-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P638 – Brian Rubio

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P638

Comment P638-1 When I go to Olvera St. I can take the gondola to Dodger Stadium

Response P638-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P639 – Jennie Rubio

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P639

Comment P639-1 I cant wait to ride the gondola

Response P639-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P640 – Victor Aguilar

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P640

Comment P640-1 I have bad eye sight + no longer drive Im sure I will ride the gondola

Response P640-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P641 – Linda Garcia

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P641

Comment P641-1 I really don't like to drive Downtown so riding the gondola will be nice

Response P641-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P642 – Rogelio Salazar

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P642

Comment P642-1 Going to Dodger Stadium + not having to pay for Parking will be nice taking the gondola

Response P642-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P643 – Debra Sosa

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P643

Comment P643-1 I support the Gondola because it's easier to get to Dodger Stadium I've been going to Dodger Stadium for years since I was a Kid

Response P643-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P644 – Lucy Quevedo

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P644

Comment P644-1 I support the Gondola since it would be easier to get to the Dodger game. I've been going to the Dodger games since I was a little girl

Response P644-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P645 – Mary Urrutia

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P645

Comment P645-1 I support the Gondola, it's easy access to Dodger Stadium. I've been going to Dodger games since I was a little girl.

Response P645-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P646 – Roxana Duran

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P646

Comment P646-1 I support Gondola

Response P646-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P647 – Luis Reynoso

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P647

Comment P647-1 Love the idea I hate traffic and struggling for parking specially when I go for the dodgers game. This idea will make the games more enjoyable.

Response P647-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P648 – Daisy Reynoso

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P648

Comment P648-1 This is great. Hopefully it is successful and they expand the program. Create new metro lines in the sky by cable car.

Response P648-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P649 – Angela Reynoso

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P649

Comment P649-1 I support the gondola, because it a transportation to reduce traffic.

Response P649-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P650 – Raymond Noriega

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P650

Comment P650-1 I support the gondola I believe its going to be a quick transportation to get to one place to another.

Response P650-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P651 – Leticia Reynoso

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P651

Comment P651-1 I support the gondola because my family and I won't need to take our cars and worried about parking when going to the dodgers games.

Response P651-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P652 – Leslie Reynoso

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P652

Comment P652-1 Doing this doesn't only help fans but also it would reduce traffic around the dodger stadium combining a train ticket with a flying along leaving more space for employees to park inside the stadium.

Response P652-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P653 – Silvano Reynoso

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P653

Comment P653-1 Great idea and fancy transportation it helps with air pollution.

Response P653-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P654 - Zheng

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P654

Comment P654-1 Support Gondola

Response P654-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P655 - Zheng

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P655

Comment P655-1 Support Gondola

Response P655-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P656 – Chris Barry

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P656

Comment P656-1 Support! Gondola.

Response P656-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P657 – Ken Wong

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P657

Comment P657-1 I support gondola.

Response P657-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P658 – Amanda Cotylo

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P658

Comment P658-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P658-1 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. 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 P658-2 I live very close to Chinatown (and used to live on Chung King Rd) and this seems like a vanity project, an eyesore, and we have no idea about the impact on the environment as well as the residents. I honestly thought it was a joke when I first heard about it, as in "what is the dumbest thing you can conceive that rich people want to do to help ruin Los Angeles" oh I know! Big GONDOLAS over an already over saturated and gentrified area of our city!

Just, NO. STUPID IDEA. Whoever thought this end can go kick rocks. Thx

Response P658-2 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. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for 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, which would be less than significant. 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 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. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how 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.

Comment Letter P659 – Eddie Barranza

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P659

Comment P659-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P659-1 This comment indicating opposition to the proposed Project 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 P659-2 Metro went forward with this project without an open public process and without competitive bidding. I don't understand the ownership or operation of the project because the details have been hidden from the community. Who is paying for this project? Will taxpayers be left holding the bag?

Response P659-2 This comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. 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. 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. 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. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P659-3 Lack of community consultation: The community has been neglected and our voices have not been heard. No one asked us our vision for our community.

Response P659-3 Refer to Response 659-2 for an overview of outreach and community engagement during the Draft EIR scoping period, as well as during the Draft EIR public review period. Consistent with CEQA Guidelines section 15004(b), the Draft EIR was "prepared as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment." Under CEQA, the purpose of a Final EIR is to respond to comments received on the Draft EIR during the public review period and incorporate changes to a proposed project in response to such comments. (CEQA Guidelines, § 15088). Consistent with CEQA, comments received on the Draft EIR were responded to in the Final EIR.

Comment Letter P660 – Brandon Gibbons

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P660

Comment P660-1 My name is Brandon and I was born and raised and longtime resident in Cypress Park. I work at the Eagle Rock Branch Library where you all tried to put your LA Art brochures on our bulletin board. At first, I thought nothing about this. I thought it was a whole new layer to the metro system, that it would be air trains like they have in San Francisco at the SFO and OAK airports. BART is something everyone loves and we should have a Metro like that here in LA. When I found out it was just to only go to see the Dodgers, I thought no way.

Response P660-1 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. 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. 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. Refer to Section 2.1, 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. 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.

Comment P660-2 I think LA Metro should focus on the transit problems we already have. How come there aren't more train lines to each neighborhood in LA? How come it says gondola transit is popular in other cities when literally I've never heard of these things before besides when people go skiing? I think if you have money for this, you have money for our trains and buses.

Response P660-2 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express 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. 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. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P660-3 It's not right that there's only some days the Metro has free fare days. And when people find out about it, it's on social media. That stuff makes a huge difference when you make hourly like me doing something you love because you want to be in the community. If the LA ART which isn't even Rapid Transit because gondolas are slow and this one only goes to one spot, if there's money for something like this, you should use it to benefit everybody and let there be more free fare days.

Response P660-3 Refer to Section 2.1, 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. 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 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. 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 how 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.

Comment P660-4 Change your plans and build something else. I know Metro wants to actually help people get to where they need to go. This one is not the way to do it.

Response P660-4 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.

Comment Letter P661 – Danny Orellana

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P661

Comment P661-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). As a frequent visitor of the LA Historic Park, this will be a terrible addition to the space.

Response P661-1 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. 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. 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.

Comment Letter P662 – Lisa Duardo

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P662

Comment P662-1 The purpose of this document is to advocate for the NO PROJECT CEQA ALTERNATIVE.

Response P662-1 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. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how environmental benefits of the proposed Project would not be realized through the “No Project Alternative” which 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 Los Angeles Union Station (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.

Comment P662-2 I am born and raised in the Metro Downtown area. I travel the Historic Arroyo Seco Pkwy, North Broadway, Spring, Alameda and Main Streets most of my life enjoying the open space vistas of the San Gabriel Mtns., the Repetto Hills, Santa Monica Mtns (of which Elysian Park is considered part of and a National Parks Service, Rim of the Valley Corridor) and the beautiful skyline of Downtown LA. And I strongly believe that this proposed project would despoil these vistas forever. It is a significant unavoidable adverse impact. And the Draft EIR simply states, “scenic vistas taken under consideration” dismissing or omitting the validity and value of said vistas. But I get ahead of myself. As it is the purpose for this proposed project that I take issue with.

Response P662-2 Refer to Response P662-16 regarding the proposed Project’s less than significant aesthetic impacts. Refer to Response P662-3 regarding the need for the proposed Project.

Comment P662-3 ES.2 Project Purpose- Improve mobility and accessibility for the region by providing a daily, high capacity, ariel rapid transit from Los Angeles Union Station to the Dodgers Stadium... The reality is the proposed project is specifically tailored for game days. This use of public land, airspace (what about private property airspace?) and funds for a private venture is stomach-churning. The Daily News recently reported on studies suggesting the opposite of this Draft EIR statement of improved mobility and accessibility. The region could use real transportation solutions for better mobility and accessibility that would improve daily life for a larger population and area than this costly and ineffective proposed project.

Response P662-3 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. 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 Section 2.0, Project Description, 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. As described throughout the Draft EIR, the proposed Project would require aerial easements for certain properties along the proposed Project (see Sections 2.05 of Section 2, Project Description and 3.11.1, Figure 6-12 of Section 3.11, Land Use and Planning). How the Project Sponsor acquires the aerial rights for the proposed Project is beyond the scope of the Draft EIR. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. 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.

Comment P662-4 I would like to add my comments to the on-going administrative record.

Having read and looked over the roughly 1100 pages of this Draft EIR over this MLK weekend because this project fell out of mind during the Covid Pandemic where many stakeholders like me were focused on our lives and livelihood and also may not of had access to digital meetings. This Draft EIR, I feel, is biased toward expenditure and construction of the proposed project regardless of the significant impacts with or without mitigation. Below are some of the concerns I have that I feel were not addressed in the Draft EIR or not addressed to a sufficient level of analysis for intelligent decision making. This list is not complete nor listed in numerical order as to importance:

Response P662-4 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 P662-5 through P662-36.

Comment P662-5 1. Neighborhood directly negatively effected by LA ART project, Olvera Street, Chinatown, California State Park, William Holmes Public Housing and Preschool, Ann Street Elementary, Cathedral High, Lincoln Heights, Solano Cyn., Elysian Park, Echo Park, Elysian Valley, Downey Park, Albion Park along with the major transportation

roadway corridors of North Broadway, Spring, Alameda and Main streets and possibly parts of the Historic Arroyo Seco Pkwy (Hwy110). Greatest negative impact is during construction over two to five years of six to seven days, morning to evening construction.

Response P662-5 As discussed in Section 2.0, Project Description, of the Draft EIR, construction of the proposed Project is anticipated to take approximately 25 months, including construction, cable installation, and system testing. The duration of construction for each component of the proposed Project is set forth in Table 2-4. 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. 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. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation. As discussed in the Draft EIR, all impacts during construction, with the exception of noise, would be less than significant or would be reduced to less than significant with implementation of mitigation. Operational noise impacts would be less than significant. 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. 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. 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.

Comment P662-6 2. LA ART states zero emissions. Omitted are the tables detailing particulates and emissions from construction over two to five years, six to seven days a week from morning till evening. What is the number of construction trucks and heavy machinery necessary to drill, excavate, deliver and haul material and supplies during construction period? How is this then mitigated to a level safe for the surrounding neighborhoods or which a majority is elderly and young families.

Response P662-6 The Draft EIR addressed air quality in Section 3.03, Air Quality, with supporting data provided in Appendix D, Air Quality/Health Risk Assessment Technical Report, of the Draft EIR. As shown in Table 3.3-4 (page 3.3-22 of the Draft EIR), maximum daily emissions associated with proposed Project construction would not exceed South Coast Air Quality Management District (SCAQMD) daily thresholds and impacts are less than significant. Pursuant to CEQA Guidelines Section 15126.4, mitigation measures are not required for effects which are not found to be significant. Tables 4-2 through 4-2 of the Air Quality/Health Risk Assessment Technical Report (Appendix D of the Draft EIR) lists the type and number of heavy-duty construction equipment and haul trucks required during Project construction. Refer to Appendix B, Construction Assumptions, of the Draft EIR, for details regarding the proposed Project construction assumptions.

Comment P662-7 3. Negative Impact through construction roadway closures creating gridlock with vehicles emitting toxic fumes with possible added pedestrian and auto accidents by frustrated drivers.

Response P662-7 Refer to Section 3.17, Transportation, of the Draft EIR for a discussion of Mitigation Measure TRA-B, which requires implementation of a Construction Traffic Management Plan (CTMP) and which would include street closure information, detour plans, haul routes, and a staging plan, shall be prepared and submitted to the City of Los Angeles 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. Refer to Section 3.03, Air Quality, of the Draft EIR for an analysis of the potential for impacts associated with construction emissions from the proposed Project. That analysis considered emissions associated with site preparation, demolition, grading, utility installation, building, coating, and paving from off-road construction equipment, as well as emissions from on-road mobile equipment associated with workers, vendors, and hauling. As shown in Table 3.3-4, Maximum Mass Daily Emissions Due to Construction of the Project, impacts were found to be less than significant. Furthermore, the Draft EIR analyzed the potential for off-site localized impacts associated with carbon monoxide from vehicle use at intersections impacted by the proposed Project within Section 3.03, Air

Quality, of the Draft EIR. The Draft EIR reported that the highest average daily traffic volumes at an intersection impacted by the proposed Project is expected to be well below the daily traffic volumes that would be expected to generate carbon monoxide exceedances as evaluated in the 2003 South Coast Air Quality Management District Air Quality Management Plan (AQMP) and as such, localized carbon monoxide impacts would be less than significant.

Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution in an area disproportionately burdened by pollution, and improving safety.

Comment P662-8 4. Goldline offers the same mobility and accessibility from Union Station to Chinatown and California State Park currently. So the LA ART is only offering the Dodgers Stadium.

Response P662-8 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. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less.

Comment P662-9 5. LA ART ticketing and Hub stations are only accessible via a prepaid access ticket purchased on-line. This exclude a large non-digital local population.

Response P662-9 The Draft EIR addressed ticketing in Section 2.0, Project Description, of the Draft EIR. The stations would include areas for ticketing and fare checking. 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. Refer to Topical Response N, Environmental Justice, 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.

Comment P662-10 6. Construction staging areas are not listed nor accounted for in the impact reports. These areas will add to the cumulative negative impacts for neighborhoods and other stakeholders and commuter through the large construction area throughout the two to five years of construction.

Response P662-10 The Draft EIR addressed construction staging in Section 2.0, Project Description, with supporting data provided in Appendix B, Construction Assumptions, of the Draft EIR. As discussed in Section 2.08, Construction, and Appendix B, Construction Assumptions, of the Draft EIR, construction staging may occur at the Alameda Station site and the Dodger Stadium property. For Alameda Station, Metro’s Lot B, an existing approximately 60-space parking lot in front of the Union Station Terminal and the future location of the planned LAUS Forecourt, may be utilized for construction staging and location of the crane to be used during Alameda Station’s construction. The Dodger Stadium property may also be used for construction staging, including for staging of the gondola system. Construction staging would include construction trailers for construction management use with corresponding parking for construction management, use during construction hours, and a laydown area. Proposed Project construction, including potential construction staging areas, are analyzed in the Draft EIR, including in Section 3.03 Air Quality, Section 3.08, Greenhouse Gas Emissions, and Section 3.13, Noise. Construction of the proposed Project is anticipated to take approximately 25 months, including construction, cable installation, and system testing.

Comment P662-11 7. Proposed construction schedule lists approximately 2+ years per Hub (3) and Tower (3) with the hope that some sites can run concurrently. Regular construction days – Monday – Friday 6AM-9PM, Saturdays and Holidays 8AM-6PM and Sundays when necessary. This is a unavoidable significant adverse impact to all living people and wildlife in the area.

Response P662-11 Based on the analysis contained in Section 3.0, Environmental Setting, Impacts, and Mitigation, the proposed Project would only result in significant and unavoidable impacts with regard to: Noise and Vibration: i) Construction Noise – Project-level and cumulative noise impacts to noise sensitive receptors from on-site construction activities. ii) Construction Vibration – Project-level and cumulative human annoyance vibration impacts to adjacent sensitive receptors. Refer to Section 2.0, Project Description, and Appendix B, Construction Assumptions, of the Draft EIR, for discussion of the construction of the proposed Project. As summarized in the Executive Summary of the Draft EIR, the proposed Project would have less than significant impacts related to construction with the exception of Noise and Vibration (human annoyance). Detailed analysis is provided in Section 3.0, Environmental Setting, Impacts, and Mitigation, 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 this Final EIR, for a discussion of how construction of the proposed Project would not result in significant impacts to biological resources or would result in less than significant impacts to biological resources with mitigation.

Comment P662-12 8. The majority of agencies, organizations public or private commented via a boiler plate response to adhere to laws and regulations or requesting further updates us up to dates.

Response P662-12 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 P662-13 9. 10- omits the real unavoidable adverse cumulative impact of Noise, dirt, particulate matter, vibrations, light pollution, despoiling of viewshed, increase gridlock, risk of accidents during construction and operation of LA ART.

Response P662-13 The Draft EIR addressed cumulative impacts in Section 5.0, Other CEQA Considerations, of the Draft EIR. As discussed therein, the proposed Project would result in significant and unavoidable cumulative impacts with regard to: Noise and Vibration: i) Construction Noise – Project-level and cumulative noise impacts to noise sensitive receptors from on-site construction activities. ii) Construction Vibration – Project-level and cumulative human annoyance vibration impacts to adjacent sensitive receptors. As discussed in Section 3.13, Noise, the proposed Project would not result in any significant and unavoidable operational noise impacts. As discussed in Sections 3.01, Aesthetics, 3.03, Air Quality, 3.07, Geology and Soils, 3.09, Hazards and Hazardous Materials, 3.10, Hydrology and Water Quality, 3.11, Land Use and Planning, 3.17, Parks and Recreational Facilities, 3.17, Transportation, 3.20, Wildfire, and 5.0, Other CEQA Considerations, the proposed Project would otherwise not have significant and unavoidable construction and operational impacts.

Comment P662-14 10. LA ART will not eliminate the operation of the Dodgers Stadium Express buses that offer free transportation on game days from Union Station to Dodgers Stadium.

Response P662-14 Refer to Topical Response O, Response to the UCLA Mobility Lab Study, for a discussion of how the Dodger Stadium Express would not be precluded from operating by the proposed Project. While existing riders of the 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. 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 attendees of games or events at Dodger Stadium to ride public transportation.

Comment P662-15 11. There is no benefit to the residents, businesses or visitors to this area, Chinatown, Olvera Street, California State Park, Elysian Park that is worth the financial, environmental and quality of life cost this project proposes.

Response P662-15 Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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. 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.

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 Chinatown 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 Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Response P662-11 for an overview of the proposed Project's potential environmental impacts. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P662-16 12. ES-13/AES-1, -2,-3,-4, The Draft EIR disregards or downplays the significant negative impact to the despoiling of iconic Los Angeles vistas/viewsheds of the Downtown City Skyline, the hillsides of National Parks Service Rim of the Valley Corridor including the San Gabriel Mtns. The 150' plus Hub Stations and Towers with massive gondola cables will cut right through the open space and despoil vistas and sky views. No mitigation possible.

Response P662-16 Refer to Section 3.01, Aesthetics, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which 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. 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. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park “visually memorable.” As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant. The proposed Project would also enhance the public realm, aesthetic lighting/signage, connections to open space, transit, and community facilities. As such, 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. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of the Rim of the Valley. 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.

Comment P662-17 13. AIR-3, The Project area includes within ¼ mile California State Park where families and seniors recreate, Elysian Park, Downey Park, Albion Park, established housing both private and public (Blossom Plaza, William Holmes Public Housing, Catholic High School, Temples, and Churches, Elementary and Preschools, the residential neighborhoods of Chinatown, Solano Canyon, Elysian Valley, Lincoln Heights, Arts District but any impact is deemed insignificant and so no mitigation is offered.

Response P662-17 The Draft EIR addressed Air Quality in Section 3.03 Air Quality with supporting data provided in Appendix D, Air Quality/Health Risk Assessment Technical Report, of the Draft EIR, including potential impacts to sensitive receptors, such as residents, daycare children, school children, and senior centers. As shown in Table 3.03-4 through 3.03-8 (page 3.03-22 through 3.03-26 of the Draft EIR), Project construction and operation would not exceed applicable thresholds and impacts are less than significant. Pursuant to CEQA Guidelines Section 15126.4, mitigation measures are not required for effects which are not found to be significant. Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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.

Comment P662-18 14. AIR-4, Population directly effected may not have been informed of the health dangers of GHG, large and nano dust or particulate matter produced during the two to five years of construction . Project does not offer any mitigation to this issue.

Response P662-18 The Draft EIR addressed Air Quality in Section 3.03, Air Quality, with supporting data provided in Appendix D, Air Quality/Health Risk Assessment Technical Report. As shown in Table 3.03-4 through 3.03-8 (page 3.03-22 through 3.03-26 of the Draft EIR), Project construction and operation would not exceed applicable thresholds and impacts are less than significant. Pursuant to CEQA Guidelines Section 15126.4, mitigation measures are not required for effects which are not found to be significant. Refer to Section 3.08, Greenhouse Gas Emissions, and Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, for discussion of the proposed Project's potential greenhouse gas emissions impacts. As discussed in Section 3.08, the proposed Project would result in less than significant impacts with respect to greenhouse gas emissions, and no mitigation is required pursuant to CEQA Guidelines section 15126.4. As described in Section 2.0, Project Description of the Draft EIR, proposed Project construction is anticipated to take approximately 25 months.

Comment P662-19 15. CUL-1, areas effected but downplayed are Elysian Park, California State Park and Historic Arroyo Pkwy. The parks are used for many cultural events and ceremonies where open sky and open space is valued and enriches the cultural purposes.

Response P662-19 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation. 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, which would be less than significant. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park 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.

Comment P662-20 16. GHG-1, Again, the number of construction vehicles and machinery over five years, 7 days a week will make a negative adverse impact. No mitigation is offered.

Response P662-20 Refer to Response P662-18 for discussion of how the proposed Project's potential greenhouse gas emissions impacts, which would be less than significant, and how proposed Project construction is anticipated to take approximately 25 months.

Comment P662-21 17. NV-1, No mitigation offered for Noise during the construction and operation. It is assured that that construction and operation will create noise and some of it will be negative.

Response P662-21 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. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation. Mitigation Measure NOI-A would be implemented during construction of the proposed Project, requiring a Construction Noise Management Plan to minimize construction-related noise impacts to off-site noise-sensitive receptors, which would include the construction noise barriers. Operational noise impacts would be less than significant and therefore no mitigation would be required.

Comment P662-22 18. NV-2, Draft EIR validates unavoidable during four plus years of construction, seven days a week, morning to night. The suggested mitigation offered is to install monitoring devices with no other mitigation to alleviate impact.

Response P662-22 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the vibration impacts from construction of the proposed Project. Vibration impacts associated with the proposed Project were analyzed in the Draft EIR both for building damage and human annoyance. With implementation of Mitigation Measures VIB-A and VIB-B during construction of Alameda Station, vibration damage impacts at the Avila Adobe, the Old Winery, and El Grito Mural, would be less than significant. Construction of the proposed Project would result in significant and unavoidable human annoyance impacts during construction of the proposed Project even with implementation of Mitigation Measures VIB-A and VIB-B. As discussed on page 3.13-72 of the Draft EIR, "[s]ince the human annoyance threshold is exceeded by common occurrences such as vehicle pass-bys during construction, there is no feasible method for mitigating human annoyance impacts. It should be noted that because the human annoyance threshold is so low it is already exceeded on roadways by existing truck trips." Such equipment is needed to build the proposed Project and there is no alignment or haul route option that would create sufficient separation from adjacent uses to eliminate the human annoyance impact. The Draft EIR thus included a complete analysis of vibration impacts as required by CEQA. Refer to Section 2.08, Construction, in Section 2.0,

Project Description, and Appendix B, Construction Assumptions, of the Draft EIR, for discussion of the duration of construction for each component of the proposed Project. As discussed in Section 2.0, Project Description, of the Draft EIR, construction of the proposed Project is anticipated to take approximately 25 months, including construction, cable installation, and system testing. The duration of construction for each component of the proposed Project is set forth in Table 2-4. 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.

Comment P662-23 19. POP-2, Housing, studies prove that this type of attraction will increase pressure on the existing housed population of renters and property owners by increasing rental prices and seeding property sales at higher rates making housing area unaffordable for existing elder and working class families.

Response P662-23 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how 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.

Comment P662-24 20. PR-1, despoils both California State Park and Elysian Park. No mitigation offered.

Response P662-24 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 Los Angeles State Historic Park and Elysian Park. 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 P662-25 21. PR-2, Negative impact by construction and operation to direct and adjacent areas to California State Park, El Pueblo, Union Station, Pocket Park on Alameda & Main.

Response P662-25 Refer to Section 2.0, Project Description, and Appendix B, Construction Assumptions, of the Draft EIR, for discussion of the construction of the proposed Project. As

discussed on page ES-17 of the Executive Summary of the Draft EIR, based on the analysis contained in Section 3.0, Environmental Setting, Impacts, and Mitigation, construction of the proposed Project would result in significant and unavoidable impacts with regard to Noise and Vibration (human annoyance). As demonstrated in the Executive Summary to the Draft EIR, the proposed Project would not result in any other significant and unavoidable construction impacts. The proposed Project would not result in any significant and unavoidable operational impacts.

Comment P662-26 22. PR-3, Construction and operations travel directly overhead by 100 feet or more to the Goldline, Alameda, College, Broadway and the Historic Arroyo Pkwy (110 Fwy). No mitigation offered.

Response P662-26 The Draft EIR analyzed the potential construction and operational impacts of the proposed Project, including in relation to the portions of Metro's L (Gold) Line, Alameda Street, College Street, North Broadway, and the SR-110 within the Project area. Refer to Response P662-25 for discussion of how construction of the proposed Project would result in significant and unavoidable impacts with regard to Noise and Vibration (human annoyance), and the proposed Project would not result in any other significant and unavoidable construction impacts, and would not result in any significant and unavoidable operational impacts. In addition, refer to 3.01, Aesthetics, of the Draft EIR, for a discussion of how construction and operation of the proposed Project would result in less than significant impacts with respect to scenic resources, public views, and would not create a new source of substantial light or glare that would affect views. Refer to Section 3.17, Transportation, of the Draft EIR, for a discussion of how construction and operation of the proposed Project would result in less than significant transportation impacts with implementation of mitigation.

Comment P662-27 23. TRA-4, Broadway, Spring, Alameda, Main Streets and 110 Fwy are all major emergency corridors for the area. No substantial mitigation offered.

Response P662-27 Refer to Section 3.17, Transportation, of the Draft EIR, for discussion of the proposed Project's maintenance of local and emergency access during construction. With implementation of a Construction Traffic Management Plan as outlined in Mitigation Measure TRA-B, and the Temporary Disaster Route Plan as outlined in Mitigation Measure TRA-C, adequate emergency access would be maintained in and around the proposed Project alignment and component sites throughout all construction activities and impacts would be less than significant with mitigation. Operational impacts would be less than significant.

Comment P662-28 24. TCR-1, California State Park programs & provides space for Native and cultural events that honor natural environments and open space (land and sky). LA ART would despoil this open atmosphere forever.

Response P662-28 The Draft EIR addressed 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. Upon implementation of Mitigation

Measures CUL-A, CUL-D, and TCR-A, potentially significant impacts related to tribal cultural resources would be reduced to less than significant under the proposed Project. 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.

Comment P662-29 25. TCR-2, Same as TCR-1.

Response P662-29 This comment is noted and will be provided to the decision makers for review and consideration. Refer to Response P662-28 for discussion of the Draft EIR analysis of Tribal Cultural Resources.

Comment P662-30 26. WFR-1, The project offers zero plan for rescuing human life when a gondola/ cable accident occurs whether it is a gondola falling or a stalled or unresponsive machinery operating gondola.

Response P662-30 Refer to Section 3.20, Wildfire, of the Draft EIR for discussion of the proposed Project's potential impacts to wildfire, which would be less than significant, including with respect to the implementation of emergency evacuation plans. Refer to Section 3.15, Public Services, for a discussion of how impacts related to fire protection services during proposed Project operation would be less than significant. 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 how aerial transit systems such as the proposed Project represent one of the safest modes of transportation relative to other forms of transit. The proposed Project is unlikely to become inoperable due to a system malfunction. The proposed Project system would incorporate redundancies and robust designs to minimize the possibility of mechanical failures. 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. The proposed Project would also include routine maintenance that would be performed by the system operator, and

the overall system would be observed on a daily basis as part of the startup routine. Additionally, the proposed Project would include the installation of backup battery storage at each station, tower, and junction, as needed, to provide backup power to allow unloading of the system in the event of a power grid failure. 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, earthquakes or other natural disasters, or a system failure of the proposed Project. In addition, an Evacuation Plan would be developed as part of the Emergency Operations Plan.

Comment P662-31 27. WFR-5, Gondola will travel above homes, apartments, businesses, parks and open spaces, roadways and a historic highway.

Response P662-31 Refer to Section 3.20, Wildfire, of the Draft EIR for discussion of the proposed Project's potential to increase the risk of wildfires, which would be less than significant. As discussed in Section 2.0, Project Description, 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. 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 P662-32 28. 3.1.2.3, Scenic Resources, Historic Arroyo Pkwy is listed in many digital and printed maps as a scenic highway from Downtown to Pasadena.

Response P662-32 As discussed in Section 3.01, Aesthetics, of the Draft EIR, while the Arroyo Seco Parkway/SR-110 is a National Scenic Byway and a California Historic Parkway, the SR-110 is not an officially designated State scenic highway, as determined by Caltrans' Scenic Highways – Scenic Highway System List. Refer to Appendix C, Visual Impact Assessment, of the Draft EIR, for information on the definitions of and criteria for National Scenic Byways and California Historic Parkways.

Comment P662-33 29. 3.1.2.4, Example of Light and Glare already exist in LA ART area is not a valid reason for the use of No Impact/ Insignificant. There is cumulative Light and Glare Impact to address and/or mitigate.

Response P662-33 As discussed in Section 3.01, Aesthetics, of the Draft EIR, the Project area is a developed, urban area with a high amount of existing ambient lighting. The high levels of ambient lighting exist due to vehicular and pedestrian street lighting, building security lighting, outdoor landscaping lighting, and lighting along and adjacent to the various dedicated transit guideways traveling to Los Angeles Union Station (LAUS), such as the elevated Metro L Line (Gold). In addition, high levels of ambient lighting are exhibited from vehicle and truck headlights traveling on streets and the SR-110. Cathedral High School currently has high-poled sports field lighting visible from North Broadway, Los Angeles State Historic Park, and area residents when in use. Dodger Stadium has extensive television quality sport field lighting in use during games and special events. Large special events which occasionally occur at the Los Angeles State Historic Park can also generate high levels of lighting. The lighting for the proposed Project would include low-level lighting for security and wayfinding purposes adjacent to and within the stations, junction, and towers, within cabins, at the vertical circulation, and areas for ticketing, fare checking, and queuing. In addition, low-level lighting to accent signage, architectural features, landscaping, adjacent pedestrian plazas, and mobility hubs would be installed at the stations, junctions, and towers. Lighting would also be provided underneath the elevated stations and junction. Impacts to light and glare from operations of the proposed Project would be less than significant. Refer to Topical Response K, Signage and Lighting, for discussion of the proposed Project's signage and lighting, with additional technical detail and information provided in the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR. Refer to Section 5.0, Other CEQA Consideration, for analysis of the proposed Project's cumulative impacts. As described in Other CEQA Considerations, cumulative impacts with respect to light and glare would be less than significant.

Comment P662-34 30. 3.1.6 Existing view South Entrance to California State Park will have an extensive negative impact and change forever the visual elements to the park and surrounding environment. This area consists of a Chinatown Hub , a Park Tower and heavy cables with gondolas.

Response P662-34 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 Alpine Tower would be constructed at the corner of Alameda Street and Alpine Street on City-owned property and would not be located at the south entrance to the Los Angeles State Historic Park.

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, which would be less than significant. There are no designated scenic vistas present in the area of potential impact, but 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. Views considered to be scenic locally would not be substantially impacted by the proposed Project, and while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Specifically regarding the proposed Project's cables and cabins, the location of the proposed cables and cabins would be adjacent to the existing Metro L Line (Gold) and the associated overhead catenary system, the cabins would be constantly moving in and out of view, and the cables have similar characteristics to the overhead power lines that are prevalent in views in this area. As such, the proposed cables and cabins would not significantly impact views in this area. Further, while certain southwest-facing views of the downtown Los Angeles skyline from Los Angeles State Historic Park, particularly views close to the proposed Chinatown/ State Park Station would be partially interrupted due to the proposed Project, the view from most locations in the Park would be uninterrupted by the proposed Project. These views include looking towards downtown from the southwestern corner and from the Roundhouse platform and walkway within the park. In addition, existing views of downtown from other areas within the Park are already interrupted under existing conditions by trees and intervening development. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, 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. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for an evaluation of the updated and additional KOPs for the proposed Project which would not result in significant impacts, and the aesthetic impacts of the proposed Project would remain less than significant.

Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the location and design of the Chinatown/State Park Station. As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, the Chinatown/State Park Station would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and the design would complement the existing buildings in the Project area, as well as not distract from the visually distinct Chinese architecture within this area. In addition, the new amenity building intended for use by proposed Project riders and park visitors alike was designed to reflect the scale and materiality of the existing visitor amenity buildings located within the Los

Angeles State Historic Park. Further, the pedestrian access enhancements in LU-3 between Metro's L Line (Gold) Chinatown Station and the Chinatown/State Park Station would acknowledge the visual character of existing park amenities. 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 Los Angeles State Historic Park, including reducing the size and scale of the station, integrating the existing historic granite pavers, and carefully considering the optimal location for the station. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including simulations provided for additional clarity regarding ropeway cable design for the gondola cabins. 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.

Comment P662-35 31. Hubs and Towers will shade and block sunshine to residents, businesses , street populations, visitors to State Park and it is downplayed with no mitigation suggested.

Response P662-35 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 shading, which would be less than significant. Refer to the Shade/Shadow Diagrams, included in Appendix C, Visual Impact Assessment, of the Draft EIR, for the shade/shadow diagrams prepared for the proposed Project. As discussed in Section 3.01, Aesthetics, of the Draft EIR, while shading is not a required analysis area in the CEQA Guidelines, shade diagrams were created in accordance with recommendations in the Los Angeles CEQA Thresholds Guide (2006) for Alameda Station, Alameda Tower, Alpine Tower, Chinatown/State Park Station, Broadway Junction, and Stadium Tower. The Draft EIR concluded that shadow impacts would be less than significant and, therefore, no mitigation measures are required.

Comment P662-36 32. Again, Air Rights to the public right of way , businesses, and residents, LA ART has not addressed leasing or mitigation for the use of the rights to keep airspace open and safe from possible harm to persons or property.

Response P662-36 Refer to Topical Response N, Environmental Justice, for discussion of how 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. As discussed in Section 2.0, Project Description, 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. As described throughout the Draft EIR, the proposed Project would require aerial

easements for certain properties along the proposed Project (see Sections 2.05 of Section 2.0, Project Description and 3.11.1, Figure 6-12 of Section 3.11, Land Use and Planning). How the Project Sponsor acquires the aerial rights for the proposed Project is beyond the scope of the Draft EIR. 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 P662-37 Thank you for admitting my document letter with my comments to the LA ART Draft EIR

Signed here with my typed name and todays date and time,

Lisa Duardo, January 17, 2023 3:47PM in Los Angeles.

Response P662-37 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 P662-2 through P662-36.

Comment Letter P663 – Fa Li Xiao

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P663

Comment P663-1 Please do not build this gondola in our neighborhood. It will only bring more traffic to Chinatown, not less. It's supposed to make it easier to go to see Dodgers Stadium.

Response P663-1 This comment indicating opposition to the proposed Project is noted and will be provided to the decision makers for review and consideration. 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. 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.

Comment P663-2 But I do not see that. I see more people will come to take the gondola, leave their trash like they always do when there is a baseball game, and then leave.

Response P663-2 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.

Comment P663-3 The Dodgers already does not bring more business to Chinatown, where all our business are dying. I do not see how this gondola will make it any different. It's like you planned it without knowing the neighborhood at all.

Response P663-3 Refer to Response P663-2 for discussion of the proposed Project’s features to enhance and provide additional benefits to the surrounding communities.

Comment P663-4 When Dodgers games happens, people park everywhere, people cannot drive, people cannot cross the street, people are very loud with their music and parties, and then they drink and leave trash everywhere. They do this when there is concerts at the big park on broadway too. If you make the gondola, it will just be more of the same thing. You have to listen to us, the people who live here. Please do not build this gondola in our neighborhood.

Response P663-4 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. 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 the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project’s Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project’s stations. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines (“TAG”). Nevertheless, the 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. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide improved access to Los Angeles State Historic Park and Elysian Park. Refer to Response P663-2 for discussion of the proposed Project’s features to enhance and provide additional benefits to the surrounding communities. 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. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment P663-5 I t will be very bad and you will regret it and then you will waste money to take it down.

Response P663-5 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. 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. Refer to Responses P663-1 through P663-4 for responses to comments contained in this letter. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter P664 – Kikei Wong

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P664

Comment P664-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

As a daughter of immigrants who frequents Chinatown for necessities and community, I will be impacted by this project. I am concerned about this project for the following reasons:

Response P664-1 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. 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 P664-2 through P664-11.

Comment P664-2 Built Environment:

The Gondola Project's enormous towers will cause aesthetic impacts in my community. I am concerned that the towers will obstruct views, and that the gondola cars will be used for advertising and electronic billboards.

Response P664-2 Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the location and design of the Alameda Tower, Alpine Tower, and Stadium Tower. 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's towers, which would be less than significant, and for visual simulations of the proposed Project's towers. The Alameda Tower's modern architectural style is evident and would complement the buildings within The California Endowment. The neutral light-tone gray color scheme of Alameda Tower was designed for consistency with the surrounding urban environment, and to not distract from visually distinct structures such as the United States Post Office Terminal Annex building. Alpine Tower would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and their design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. Stadium Tower would consist of an architectural design that provides visual lightness to the form to complement the existing buildings in this area. In addition, the neutral light-tone gray colors and material finishes of the Stadium Tower were selected to complement the surrounding urban environment, and to not distract from existing visually distinct structures, such as Dodger Stadium. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area.

Refer to Topical Response K, Signage and Lighting, for discussion of the proposed Project's signage and lighting, with additional technical detail and information provided in the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR. The proposed Project's Sign Concept Plan, included as Appendix B of the Lighting Study, provides that across the entire proposed Project, including stations, the junction, towers, and cabins, the proposed Project is proposing static signage and 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. 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 artists. Further, 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 proposed Project's system, including its stations, the junction, towers, and cabins, and would be designed consistent with applicable Metro, City, and State approval requirements.

Comment P664-3 Traffic:

The Gondola Project's displacement of traffic onto the surrounding neighborhoods will worsen air quality impacts from tailpipe emissions in an already overburdened community.

Response P664-3 Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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. 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 the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Comment P664-4 The Gondola Project's will increase traffic around Chinatown and Union Station. This project is designed to displace traffic from Dodger Stadium and push it onto the

surrounding communities. The existing traffic conditions are already difficult because of [explain traffic hazards, conditions, etc.] and this project will make it worse.

Response P664-4 Refer to Response P664-3 for a discussion of how CEQA does not require traffic congestion to be analyzed in the Draft EIR.

Comment P664-5 Historic and Cultural Resources:

The Gondola Project will impact historic and cultural resources such as the Los Angeles State Historic Park, historic Union Station, and the Pueblo de Los Angeles Historic Monument.

Response P664-5 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources including to the Los Angeles State Historic Park, LAUS, and El Pueblo in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation.

Comment P664-6 Environmental Justice:

This project will increase the impacts of air pollution from vehicle emissions in an area already overburdened by air emissions.

Response P664-6 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 Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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.

Comment P664-7 Gentrification:

This project will lead to displacement and increase the cost of rent in the area.

Response P664-7 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how 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.

Comment P664-8 Future development:

This project will lead to future commercial development in Chavez Ravine, without community input and without disclosure to the community.

Response P664-8 Refer to 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, for discussion of how the proposed Project solely proposes an aerial gondola system. 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. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project’s public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment P664-9 Lack of transparency:

Metro went forward with this project without an open public process and without competitive bidding. I don’t understand the ownership or operation of the project because the details have been hidden from the community. Who is paying for this project? Will taxpayers be left holding the bag? Lack of community consultation: The community has been neglected and our voices have not been heard. No one asked us our vision for our community.

Response P664-9 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. This comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro’s sole source determination for the proposed Project. 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. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the

proposed Project’s public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment P664-10 We never asked for this project. We don’t need or want this project.

Response P664-10 Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team’s outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project’s commitments to features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for discussion of how 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 Letter P665 – Rodney Scholtes

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P665

Comment P665-1 I'm sending you this email to let you know I am opposed to the creation of a gondola as public transportation.

Response P665-1 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. 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 P665-2 It will be a terrible thing for those who have lived in the neighborhoods it will fly over, eliminating their privacy.

Response P665-2 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. The proposed Project would be located in a densely populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and as discussed in Topical Response M: Comparable Urban Aerial Transit Systems, modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Refer to Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, for discussion of how cabin windows can be equipped with privacy glass that can become opaque while 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.

Comment P665-3 It also seems rather ridiculous as a means of transportation to help a very few. LA Metro needs to rethink its bus system to and from the stadium.

Response P665-3 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. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. 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 be free to ride for anyone with a ticket to a Dodgers game and 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 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 P665-4 Get a fleet of electric busses for the environment, make a dedicated lane in and out of the stadium for the busses, even if you have to remove parking on Sunset for game days.

Response P665-4 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. As discussed in Topical Response H, 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 Transportation Systems Management Alternative is not a permanent transit connection as bus routes, and operations are frequently modified and/or eliminated due to fiscal and ridership issues.

Comment P665-5 If McCourt really thinks the gondola is the way to access his private property, and build retail, entertainment and housing on his parking lots, he needs to use his own money to build the gondola, and he needs to lease the airspace from the citizens that will be effected.

Response P665-5 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. Refer to 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, for a discussion of how the proposed Project solely proposes an aerial gondola system. 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. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project. As discussed in Section 2.0, Project Description, 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. As described throughout the Draft EIR, the proposed Project would require aerial easements for certain properties along the proposed Project (see Sections 2.05 of Section 2, Project Description and 3.11.1, Figure 6-12 of Section 3.11, Land Use and Planning). How the Project Sponsor acquires the aerial rights for the proposed Project is beyond the scope of the Draft EIR.

Comment P665-6 I am a Dodger fan and I attend 25 plus games a season, I drive from the San Fernando Valley, and have also used the bus from Union Station on a very few occasions.

Response P665-6 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 P665-7 Maybe a better idea is for Mc Court to sell all the parking lot land to LA City, and let us as citizens profit from the revenue, and look at better options for getting to and from the stadium.

Response P665-7 Refer to Response P665-3 through P665-5 for a discussion of the purpose and need for the proposed Project, the Project Sponsor, costs and financing, and consideration of alternatives to the proposed Project.

Comment Letter P666 – Diane M. L. Tan

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P666

Comment P666-1 I am a longtime civil rights and community advocate. I am a volunteer in L.A. Chinatown and actively involved in various community and professional organizations.

Response P666-1 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 P666-2 After reviewing the Draft Environmental Impact Report (Draft EIR) regarding the proposed Los Angeles Aerial Rapid Transit Project, it seems that Los Angeles County Metropolitan Transportation Authority (Metro) is going to great lengths to support and condone the proposed aerial gondola system project connecting Union Station and the Dodger Stadium property by the private entity, Los Angeles Aerial Rapid Transit Technologies LLC, which apparently is subject to change.

Response P666-2 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. 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 P666-3 Such project will seriously harm and have significant, permanent and irreversible adverse effects on the residents, small businesses, and others, as well as the environment, aesthetics, preservation, and sustainability of the surrounding communities, such as Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Response P666-3 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 Chinatown, Mission Junction, Elysian Park, Solano Canyon, and Los Angeles State Historic Park. 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 P666-4 Justbecause there are aerial transit systems in the few cities and countriesreferred to in the Draft EIR, does not justify the construction and operationof an unnecessary, extremely costly, and unwelcomed aerial transit system in theproposed areas of Los Angeles.

Response P666-4 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. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and topical Response C, Project Features, for discussion of the proposed Project team’s outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project’s features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements.

Comment P666-5 It is clearly wrong to allow a private entity to permanentlytake-over public air space and various public and privately-owned properties tonegatively gentrify these urban areas by creating a visually and physically objectionablenuisance mainly for profit in order to cater to a few. Such proposed project will establish an extremely badprecedent if this public entity and potentially other public entities areallowed to acquire extensive public air space and public properties for privategain and in order to exploit and harm minority and low-income neighborhoods.

Response P666-5 Refer to Section 2.5, Proposed Project Alignment and Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR

for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. 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 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. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P666-6 This proposed project does not and should not qualify as “the first environmental leadership transit project under Senate Bill 44.”

Response P666-6 Refer to Topical Response A, SB 44, for discussion of how the proposed Project qualifies as an “environmental leadership transit project” under SB 44.

Comment P666-7 In addition, such proposed project will not significantly diminish traffic, air and noise pollution or ensure public safety on a short-term or long-term basis. In fact, the opposite probably will occur with the construction of such proposed project and changing of the areas with access to the aerial gondola into a huge parking lot primarily for the proposed project's benefit, while creating and causing significant and serious traffic, air and noise pollution, public safety concerns, and other adverse impacts.

Response P666-7 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 Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. 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 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 travelled. The proposed Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles travelled. 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. As detailed therein, operational noise impacts would be less than significant. 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 safety features of the proposed Project and how system components would be equipped with security features for system safety. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of how comparable urban aerial transit systems have been shown to reduce violent crime in nearby areas. 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. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the 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.

Comment P666-8 This proposed project is a substantial waste of taxpayers' money and natural resources, and fails to sufficiently and permanently protect the environment, as well as the residents, small businesses and others in the communities that are adversely affected. These communities do not need an amusement park ride, like this proposed aerial gondola, but more appropriate, safe and affordable public transportation, low-cost housing, and culturally-sensitive and necessary community businesses and services, for the people.

Response P666-8 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project. 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. 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. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region’s most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety.

Comment P666-9 The findings in the Draft EIR pursuant to the evaluation of the potential environmental effects associated with the construction and operation of this proposed project as having “no impact,” “less than significant impact with mitigation” or “less than significant” impact, are inaccurate, unsubstantiated or unreasonable and unfair. This proposed project should be denied due to its potentially significant, substantial and irreversible adverse environmental effects.

Response P666-9 As discussed on page ES-17 of the Executive Summary of the Draft EIR, based on the analysis contained in Section 3.0, Environmental Setting, Impacts, and Mitigation, construction of the proposed Project would result in significant and unavoidable impacts with regard to Noise and Vibration (human annoyance). As demonstrated in

the Executive Summary to the Draft EIR, the proposed Project would not result in any other significant and unavoidable construction impacts. The proposed Project would not result in any significant and unavoidable operational impacts.

Comment Letter P667 – Samantha Mohammad

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P667

Comment P667-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P667-1 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. 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 P667-2 As a resident of Los Angeles County and as a physician I believe the greater LA community will be impacted by this project. I am concerned about this project for the following reasons:

Response P667-2 This comment provides a general introduction to comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses P667-3 through P667-10.

Comment P667-3 Gentrification:

This project will lead to displacement and increase the cost of rent in the area. This will greatly affect the surrounding areas that currently house many low income residents. By using resources to create this gondola you are actively saying you care more about the Olympics than caring for our unhoused neighbors as this money could be funneled into affordable housing instead.

Response P667-3 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how 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. As discussed in Topical Response E, no funding for housing would be used for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project, which would provide the first permanent transit connection to Dodger Stadium, one the region's most visited venues.

Comment P667-4 Environmental Justice:

This project will increase the impacts of air pollution from vehicle emissions in an area already overburdened by air emissions. They will also displace traffic onto already underserved areas with poor resources worsening air quality.

Response P667-4 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. Further, the proposed Project would address a need for a permanent transit connection to one of the region's most visited venues and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. 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 the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. By providing efficient, high-capacity, and faster alternative access to Dodger Stadium for games and special events, however, overall vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days would be reduced by the proposed Project because of game/special event attendees shifting to riding public transit rather than driving to Dodger Stadium. Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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.

Comment P667-5 Traffic:

The Gondola Project's displacement of traffic onto the surrounding neighborhoods will worsen air quality impacts from tailpipe emissions in an already overburdened community. The Gondola Project's will increase traffic around Chinatown and Union Station. This project is designed to displace traffic from Dodger Stadium and push it onto the surrounding communities. The existing traffic conditions are already difficult

because of [explain traffic hazards, conditions, etc.] and this project will make it worse.

Response P667-5 Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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. Refer to Response P667-4 for discussion of how traffic congestion is not required to be analyzed in the Draft EIR under CEQA.

Comment P667-6 Historic and Cultural Resources:

The Gondola Project will impact historic and cultural resources such as the Los Angeles State Historic Park, historic Union Station, and the Pueblo de Los Angeles Historic Monument.

Response P667-6 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to historic and cultural resources including to the Los Angeles State Historic Park, LAUS, and El Pueblo in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation.

Comment P667-7 Future development:

This project will lead to future commercial development in Chavez Ravine, without community input and without disclosure to the community.

Response P667-7 Refer to 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, for discussion of how the proposed Project solely proposes an aerial rapid transit system. 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. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment P667-8 Lack of transparency:

Metro went forward with this project without an open public process and without competitive bidding. I don't understand the ownership or operation of the project because the details have been hidden from the community. Who is paying for this project? Will taxpayers be left holding the bag?

Response P667-8 This comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. 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. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Response P667-9 for discussion how Metro sought to engage the community in each stage of the environmental review process.

Comment P667-9 Lack of community consultation: The community has been neglected and our voices have not been heard. No one asked us our vision for our community.

Response P667-9 Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The public input during this period led directly to changes to the proposed Project to incorporate public feedback, including changes to the proposed Project alignment to include the intermediate Chinatown/State Park Station, redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of outreach and community engagement during the Draft EIR public review period and community engagement efforts during the preparation of the Final EIR.

Comment P667-10 We never asked for this project. We don't need or want this project.

Response P667-10 Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team’s outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project’s commitments to features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for discussion of how 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 Letter P668 – Brandy Jimenez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P668

Comment P668-1 My name is Brandy and I was born and raised in Lincoln Heights. I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P668-1 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. 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 P668-2 The Gondola Project's towers will ruin our views, and the gondola cars will be used for advertising and electronic billboards that we do not want in our skyline. You would not build this kind of thing in Beverly Hills or Santa Monica. But you would do it here where working class Asian and Latino families are fighting for their lives.

Response P668-2 Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the location and design of the Alameda Tower, Alpine Tower, and Stadium Tower. 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's towers, which would be less than significant, and for visual simulations of the proposed Project's towers. The Alameda Tower's modern architectural style is evident and would complement the buildings within The California Endowment. The neutral light-tone gray color scheme of Alameda Tower was designed for consistency with the surrounding urban environment, and to not distract from visually distinct structures such as the United States Post Office Terminal Annex building. Alpine Tower would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and their design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. Stadium Tower would consist of an architectural design that provides visual lightness to the form to complement the existing buildings in this area. In addition, the neutral light-tone gray colors and material finishes of the Stadium Tower were selected to complement the surrounding urban environment, and to not distract from existing visually distinct structures, such as Dodger Stadium. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. Refer to Topical Response K, Signage and Lighting, for discussion of the proposed Project's signage and lighting, with additional technical detail and information provided in the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR. The proposed Project's Sign Concept Plan included as

Appendix B of the Lighting Study provides that across the entire proposed Project, including stations, the junction, towers, and cabins, the proposed Project is proposing static signage and 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. 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 art collaborators. Further, 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. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR fully analyzed and disclosed the proposed Project's potential environmental effects, including on the surrounding communities.

Comment P668-3 It will also displace traffic from the Stadium area to the Chinatown, Dogtown, Downtown, and Lincoln Heights areas. Our neighborhoods will receive worse air quality impacts from tailpipe emissions in our already overburdened communities. This is wrong and your oversight on this shows how greedy you are in wanting to build this gondola at the expense of the people's health.

Response P668-3 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 the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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. 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.

Comment P668-4 The gondola will also ruin impact historic, cultural, and communal resources such as the Los Angeles State Historic Park, historic Union Station, and the Pueblo de Los Angeles Historic Monument and Olvera Street. It is wrong that you've gone through our Olvera Street and Lincoln Heights businesses to make workers sign support letters without educating them on the impacts of the project. How can you do that to people? That says everything about the project, that you would lie to everybody and ruin the historic character of LA to build this vanity project.

Response P668-4 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources including to the Los Angeles State Historic Park, Los Angeles Union Station (LAUS), and El Pueblo, in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. 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. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for discussion of how 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 P668-5 Not only that but the gondola will lead to displacement and increase the cost of rent in the area. It will lead to future commercial development in Chavez Ravine, without community input and without disclosure to the community. If you actually listened to the community, you would know that we need renter protections, we need small business stimulus, we need free transit. How long have people been asking for free transit? If you asked what people wanted from LA Metro, you wouldn't hear anyone say a gondola.

Response P668-5 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. Also refer to 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, for discussion of how the proposed Project solely proposes an aerial gondola system. 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. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to Topical Response N, Environmental Justice, for discussion of how 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. 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. Further, the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents.

Comment P668-6 Come to your senses and kill this project. Unless you have some free shuttles and free bike lending systems to come through with, stay out of our neighborhoods.

Response P668-6 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. 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. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for a discussion of how a system of buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events 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 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. For example, the current Dodger Stadium Express service from South Bay serves a broad area of southern Los Angeles County at stations spread across eight miles, is free, and travels on a priority lane within the I-110 freeway median for most of its trip, but the South Bay Dodger Stadium Express 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. As discussed in Section 5.0, Additions, of the Final EIR, 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/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. 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/last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station.

Comment Letter P669 – Allen Natian

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P669

Comment P669-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). As a transit and walkable city advocate, I strongly urge you to object this project. It does not solve traffic while wasting money. Sure it's private money but the residents impacts will be not worth this gondola spectacle. There has been little public outreach and therefore feels sketchy.

Response P669-1 Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P669-2 In addition, The Gondola Project will impact historic and cultural resources such as the Los Angeles State Historic Park, historic Union Station, and the Pueblo de Los Angeles Historic Monument.

Response P669-2 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources including to the Los Angeles State Historic Park, LAUS, and El Pueblo in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation.

Comment P669-3 This will also make gentrification worse.

Response P669-3 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how 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.

Comment P669-4 If you want less traffic and better transit, a gondola is not the answer. Better transit is. Please side with the people, not a billionaire.

Response P669-4 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for a discussion of how 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.

Comment Letter P670 – Sarah Kate

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P670

Comment P670-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). I am an avid Dodgers fan and usually drive to the games and park in the stadium. I saw that the gondola would be built on top of the parking lot, taking parking away from people. How will that help the situation? Especially since the plan doesn't even include additional parking.

Response P670-1 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. 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. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the 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.

Comment P670-2 If I'm coming from Los Feliz, I'm not going to drive to Union Station to board the gondola and then go into the Stadium. And then what? Wait in a Disneyland style line to get back on the gondola to get to my car at Union Station? That doesn't make sense. I feel like the people who planned this have a fundamental misunderstanding of Los Angeles. We drive places. We don't gondola places.

Response P670-2 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queueing at stations, and pre-game and post-game transportation.

Comment Letter P671 – Eric Adams

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P671

Comment P671-1 First and foremost, leaving off Frank McCourt's desire to build The Grove-Chavez Ravine from the report is reprehensible. Everyone working on this dishonest proposal should be ashamed of themselves.

Response P671-1 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 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. Refer to 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 for a discussion of how the proposed Project solely proposes an aerial gondola system.

Comment P671-2 Secondly, calling this project a "public transit" project is majorly deceptive since the project is not public, nor does it behave as transit. It is an attraction, and should be labeled that way.

Response P671-2 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Although forms of aerial transit technology have been available and utilized for the last 100 years, modern applications have seen the evolution of the technology as a feasible mode of urban rapid transit. As discussed in the Technology Penetration Analysis, included in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, a large capacity for a new mode of transportation in Los Angeles will allow passengers to see the potential for other emerging innovations to be integrated into the public transit system, and the proposed Project would thus exemplify how alternative transportation technology can be integrated into a city's transportation infrastructure and will show that new technology can successfully operate in concert with other existing modes of transportation.

Comment P671-3 And thirdly, Chavez Ravine and the surrounding areas have been raped more than enough times. No more. We are paying attention to those of you working on this disgusting boondoggle.

Response P671-3 Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine.

Comment Letter P672 – Ashley Evangelista-Mendiola

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P672

Comment P672-1 I am writing to voice my opposition to the Los Angeles Aerial Transit Project ("The Gondola" at Dodger Stadium) I am a resident of Solano Canyon. I am concerned with how the project will be paid for if the project goes over budget.

Response P672-1 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. 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. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment Letter P673 – Jennifer Martinez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P673

Comment P673-1 I am a resident of Echo Park and I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). I have four concerns.

First, I am extremely concerned that the DEIR process has not been sufficiently transparent. I would like to know why there have been no public information sessions physically IN CENTRAL CHINATOWN that would allow residents, business owners and neighbors like me to attend. The public information sessions that have been held in late 2022 and early 2023 have been at Union Station, at Cathedral High School, and on Zoom. These sessions have excluded those who cannot easily walk to Union Station or Cathedral High School, well outside of downtown Chinatown, and those who do not have easy access to computers. These sessions have completely excluded those who will be impacted the most by this project.

Response P673-1 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback, including selecting the proposed Project's alignment and the location of Chinatown / State Park Station, as discussed in Section 5.0, Other CEQA Considerations, of the Draft EIR. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. 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, to accommodate agencies, interested parties, and organizations who were unable to attend the meetings held in person. Both Los Angeles Union Station and Cathedral High School are along the proposed Project alignment. 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.

Comment P673-2 I am outraged that the public comment process has been so incomplete and so opaque. How is it possible that LA Metro has been completely unable to hold a public information session IN CHINATOWN, while at the same time using promotional materials that advertise Chinatown as a backdrop? This is unacceptable. This shoddy approach to reaching residents of Chinatown demonstrates arrogance and cynicism on the part of LA Metro and Frank McCourt. LA Metro has not shown so far that it is capable of gathering public input for this project. Thus far, this is a project being undertaken without knowledge of the communities it will impact, and without gathering sufficient input from these communities.

Response P673-2 Refer to Response P673-1 for a discussion of community outreach regarding the proposed Project. 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. 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 P673-3 My second concern is the aggressive construction timeline: the Executive Summary states construction could begin in 2024 and take 25 months. It is obvious that though it is not stated, the goal of the timeline is to get the gondola in place in time for the 2028 LA Olympics. This rushed timeline could explain why the public outreach has been so frankly lame. The timeline makes it appear that LA Metro places no value on conducting an honest and thorough public comment process.

Response P673-3 Refer to Response P673-1 for a discussion of community outreach regarding the proposed Project. The Draft EIR addressed construction duration in Section 2.0, Project Description, with supporting data provided in Appendix B, Construction Assumptions, of the Draft EIR. Construction of the proposed Project is anticipated to take approximately 25 months, including construction, cable installation, and system testing.

Comment P673-4 My third concern is the complete lack of clarity around funding for this project. It is unclear how much of the bill will be footed by McCourt, and completely unclear what the timeline for his funding will be. Will funding for this project eventually end up on LA taxpayers? LA Metro and McCourt need to supply much more detailed information about the funding for this project.

Response P673-4 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. 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. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P673-5 My fourth concern is one of safety of riders. The Executive Summary states that the gondola will operate from 6am - 12pm, and that it will be operated remotely. How will riders be protected, especially after dark, when the gondola is being operated? There have been numerous security issues after Dodger games, when fans who have been drinking get into conflicts. How will this issue be handled aboard the gondola? Since the pandemic, Metro has struggled to regain riders it has lost, due to dangerous conditions on trains regarding individuals who are mentally unstable, open drug use, and lack of personnel to address and contain these issues. How does Metro plan to maintain safe conditions for its riders aboard the gondola, and in gondola stations? What would make the gondola stations any different from any other Metro stations in this regard?

Response P673-5 Refer to Topical Response J, Gondola Design and Operations, for discussion of passenger safety and Section 2.0, Project Description, of the Draft EIR. The proposed Project is equipped with security features. For example, to provide added security to system 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. 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 system control room at Dodger Stadium

Station. Each station would be staffed at all times during operations. 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 P673-6 I am disappointed in the lack of true outreach to affected neighborhoods, and I strongly oppose this gondola project.

Response P673-6 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. Refer to Response P673-1 for a discussion of community outreach regarding the proposed Project.

Comment Letter P674 – Sherin Bennett

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P674

Comment P674-1 I'm writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project. I live in Los Feliz, work downtown, and visit Elysian Park and LA State Historic Park often on my bike. I go to Echo Park often. I'm a bike rider and public transit commuter. The gondola will negatively impact Los Angeles in many ways, including:

Response P674-1 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. 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 P674-2 through P674-4.

Comment P674-2 - Increasing traffic around Chinatown and Union Station by pushing it away from Dodger Stadium. The existing traffic conditions in Chinatown and around Union Station are already crowded and chaotic, and this project will make it worse. It will also bring more traffic emissions to Chinatown.

Response P674-2 Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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. 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 the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Comment P674-3 - The Gondola project's towers will obstruct park views in Elysian and LA State Historic Park, and this project will significantly impact LA State Historic Park, a much-needed green space in the area.

Response P674-3 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, which would be less than significant, including at the Los Angeles State Historic Park and

Elysian Park. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, Los Angeles Union Station (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. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park “visually memorable.” As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant. 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 Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project’s Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park 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. 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 P674-4 There are so many better options than this invasive Gondola. I want Metro to fund *real* public transit options to Dodger Stadium that will not displace or harm existing communities. Create a safe route to bike or walk from the Chinatown metro stop to Dodger stadium, and provide secure bike parking at the stadium.

Response P674-4 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how 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. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which 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. While this alternative would provide improved pedestrian connections compared to existing conditions, the 25 minute plus travel time from the Metro L Line (Gold) Station to the location of the proposed Dodger Stadium Station would be at least nine times greater than the three minute travel time between those two locations with the proposed Project, and this alternative would be unlikely to attract substantially more people to walk to Dodger Stadium compared to existing conditions given the travel time and the physical exertion. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project. As discussed in Section 5.0, Corrections and Additions, of the Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park, the City's second largest park, comprising 575 acres, and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/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. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, and Topical Response N, Environmental Justice, for discussion of how the proposed Project will not displace housing, prevent planned housing, or preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities. 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.

Comment Letter P675 – Jaime Zavaleta

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P675

Comment P675-1 I have lived and worked in Los Angeles all 30 years of my life. I hate that we are a car-centric city with such poor public transportation. But a gondola is the last solution I would ever come up with to address that. Literally. I would come up with a catapult, or a human slingshot, or the cannon from the Medieval Times backlot before I came up with a gondola. It's like— did you even go to engineering school?

Response P675-1 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. 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 P675-2 Don't build this gondola because it will displace working class communities and you have no concept for socioeconomic displacement and how the history of transit construction, freeways, and redlining all plays into that. Don't build this gondola because it will make you look like a fool.

Response P675-2 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how 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.

Comment P675-3 Have you addressed that in your little environmental report? What do you mean there's no significant impact made by this project? There's significant impact already on my brain just from watching you guys try to justify this. Oh an "innovative" way to travel is coming to Los Angeles. Excuse me? The lime scooters that middle schoolers street race on down 6th St is more innovative than this. How will LA ART compensate the public for the shoddy lies they've told and time they've wasted on the community for all this.

Response P675-3 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. 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 P675-4 Maybe you should take a hint from the rest of LA and take some acting classes. You sure need some since you're not very good at pretending this is a good idea either. Clearly you are not meant for transit planning, Mr. Cory Zelmer. Upright Citizens Brigade has open enrollment. I suggest that.

Response P675-4 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 Letter P676 – Tabatha Yelos

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P676

Comment P676-1 I am writing to express my opposition to the Dodger Stadium Gondola project. I have several concerns about the Draft EIR.

Response P676-1 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. 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 P676-2 through P676-11.

Comment P676-2 My first issue concerns AECOM, the company that prepared the Draft EIR. This company was selected and paid by Frank McCourt and LAART and thus, it is natural that the findings in the EIR would favor the interests of the developer. Every category was found to have "less than significant" impacts despite concerns from the community. I fear that the evaluations in the EIR contain a deep bias in favor of the developer. *Metro should work with the community to select an unbiased entity to conduct the EIR.*

Response P676-2 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. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR. As discussed on page ES-17 of the Executive Summary of the Draft EIR, based on the analysis contained in Section 3.0, Environmental Setting, Impacts, and Mitigation, the proposed Project would result in significant and unavoidable impacts with regard to Noise and Vibration (human annoyance). As demonstrated in the Executive Summary to the Draft EIR, the proposed Project would not result in any other significant and unavoidable construction impacts. The proposed Project would not result in any significant and unavoidable operational impacts. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the

public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately after 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. 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. AECOM was selected from Metro's roster of environmental consultants. Further, consistent with the requirements of CEQA, Metro has and will independently review, evaluate, and exercise its judgment over the proposed Project's environmental review and EIR. The Draft EIR that was circulated reflects Metro's independent judgment.

Comment P676-3 *Air Quality*

The Air Quality analysis found that the project would reduce VMTs and therefore decrease emissions. I find this hard to believe. As mentioned repeatedly by the community, the project would simply offset the VMTs to another location: either the station at Union Station or the station in Chinatown. People would still have to travel from all over Los Angeles to get to the gondola. The analysis does not account for first and last mile(s - in this case) traveled and therefore I fail to see how the overall emissions would be significantly reduced.

Response P676-3 Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown 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 Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Section 3.17, Transportation, with supporting information provided in Appendix N, Transportation Appendices, of the Draft EIR, for a discussion of how model development and calibration took into account the relationship between zip code of origin (and its transportation variables such as travel time and cost for driving compared with riding transit) and the resulting mode choice decision for an attendee at a sporting event. As discussed on page 3.17-28, data to calculate trip length for the Draft EIR's VMT analysis also included the share of vehicles destined for Dodger Stadium by zip codes within a 50-mile radius of Dodger Stadium on game days during the Dodgers' 2019 season. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation.

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 the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. By providing efficient, high-capacity, and faster alternative access to Dodger Stadium for games and special events, however, overall vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days would be reduced by the proposed Project because of game/special event attendees shifting to riding public transit rather than driving to Dodger Stadium.

Comment P676-4 *Energy Analysis*

Again, in this section the project claims to reduce VMTs without showing how exactly that will happen. The VMTs will simply be displaced to the gondola stations instead of reduced. Further, this analysis claims that the project will increase public transit ridership. This is a broad claim that seems to be based solely on the fact that people will ride the gondola to the stadium, but does not acknowledge that there is no

first/last mile(s) solution included in the project and people will still need to drive to the gondola station in order to take it.

Response P676-4 Refer to Response P676-3 for a discussion of the proposed Project’s transportation modeling. Refer to Section 3.06, Energy, with supporting data provided in Appendix H, Energy Technical Report, of the Draft EIR, for an analysis of the proposed Project’s potential energy impacts, concluding that construction and operation of the proposed Project would result in less than significant energy impacts. Refer to Section 2.0, Project Description, of the Draft EIR, for a discussion of how the proposed Project will connect LAUS, southern California’s primary transportation hub, to Dodger Stadium. LAUS provides local and regional access via multiple modes of transport and service providers, such as Metro, Metrolink, Amtrak, and municipal and private bus operators, all of which converge at the station. Accordingly, 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. Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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. 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 the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project’s Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project’s stations.

Comment P676-5 *Greenhouse Gas Analysis*

This analysis claims that GHGs will be reduced because people will not be driving to Dodger Stadium. Again, the analysis fails to acknowledge that the project does not include a first/last mile(s) solution. A lot of Dodger fans live in the San Fernando Valley and in unincorporated East Los Angeles. How will these people get to and from the gondola? The GHGs will be offset, but I fail to see how they will be reduced.

Response P676-5 Refer to Response 676-3 for a discussion of model development and calibration to determine the proposed Project’s VMT reductions. Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown 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 Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment P676-6 *Land Use and Planning Analysis*

Contrary to the analysis, the project will most certainly break up the community by breaking up existing walkways that neighborhood residents, especially in Chinatown, use to navigate the neighborhood. Chinatown is the community in LA with the second lowest AMI after Skid Row. It is also an aging community with a lot of elderly residents who will have specific challenges navigating their neighborhood and reaching essential resources during the construction phase and once the project is complete.

Response P676-6 Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR analyzed the proposed Project's consistency with General Plan policies related to environmental justice, and how the proposed Project is consistent with General Plan policies related to environmental justice, including 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, and by ensuring quality pedestrian access by facilitating multi-modal access to and from the stations with pedestrian network improvements. Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of how the proposed Project would not physically divide an established community and would therefore result in less than significant impacts for construction and no impacts for operation of the proposed Project. As discussed in Section 3.11, while construction of the proposed Project would require lane closures, such closures would be temporary and there would be a variety of options available for connections and access within the Project area. The surrounding communities will remain accessible from other surrounding streets and the closures would not physically divide these communities. Pedestrian access would be maintained through the provision of pedestrian detours

during certain phases of construction. Operation of the Project would not require permanent travel lane or sidewalk closures, and upon completion of construction activities, all existing travel lanes along the Project alignment would continue to provide access to surrounding communities. In addition, the required aerial easements for the proposed Project alignment would not physically divide an established community because the aerial easement would not impede vehicular and/or pedestrian circulation by virtue of its aerial nature. Additionally, the proposed Project would include a number of pedestrian enhancements and a mobility hub 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, as discussed in Section 5.0, Corrections and Additions, of the Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park, the City's second largest park, comprising 575 acres, and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/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.

Comment P676-7 Their needs have not been taken into account. Second, the project does not meet the General Plan of the LA State Historic Park. Trees would need to be cut down in order to build the project. In a City with constantly worsening air quality and increasing temperatures, trees are a vital resource that should be preserved and increased. *An exception to the General Plan should absolutely NOT be granted.*

Response P676-7 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 3.04-23, in Section 3.04, Biological Resources of the Draft EIR, and in Appendix K.1, Updated Tree 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. 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. Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with the Los Angeles

State Historic Park General Plan. As discussed therein, State Parks has determined that the proposed Project would be inconsistent with the Los Angeles State Historic Park 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. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority related to the proposed Project. Refer to Topical Response F, Los Angeles State Historic Park, for a discussion of the Los Angeles State Historic Park General Plan Amendment.

Comment P676-8 *Noise Analysis*

The Draft EIR evaluated LTS for an average person, despite the fact that Chinatown has a growing elderly community with higher noise sensitivities. The age of the existing community should be taken into account when doing these analyses.

Response P676-8 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Report, of the Draft EIR, for discussion of the evaluation of noise impacts from the proposed Project. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation. Operational noise impacts would be less than significant. Refer to Responses GO17-129 and GO17-130 for discussion of the proposed Project's less than significant impact on human health associated with hearing loss, hearing damage, and sleep disturbance. Noise standards, which are generally stated based on the use function of the property and not by age group, are nonetheless developed to protect sensitive populations, including seniors and children.

Comment P676-9 The Draft EIR also mentions a Noise Disturbance Coordinator. Who is this person? Will they be fluent in English, Spanish, Cantonese, Mandarin, and other languages spoken in the area? What powers will they have to address noise complaints? This does not seem to be a sufficient mitigation measure.

Response P676-9 As discussed in Section 3.13, Noise, of the Draft EIR, implementation of Mitigation Measure NOI-A during construction of the proposed Project would require the Project Sponsor to design a Construction Noise Management Plan to minimize construction-related noise impacts to off-site noise-sensitive receptors, which would include several measures to reduce noise levels, including a noise and vibration disturbance coordinator who would be responsible for responding to any local complaints about construction noise. The noise and vibration disturbance coordinator would facilitate provision of Project information in multiple languages. The noise and vibration disturbance coordinator would determine the cause of the complaint (e.g., starting too early, bad muffler, etc.) and would be required to implement reasonable

measures to address the complaint. Construction hours, allowable workdays, and the phone number of the job superintendent would 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 actions would be implemented, and a report of the action provided to the reporting party. In addition to the noise and vibration disturbance coordinator, Mitigation Measure NOI-A also provides for noise barriers, the proper maintenance of equipment, limitations on equipment idling, and other measures.

Comment P676-10 *Population and Housing Analysis*

The project claims that it will not cause any displacement, direct or indirect. However, the potential of the project to increase property values has not been assessed, which is one of the most significant driving factors of gentrification, which would lead to displacement as we have seen in dozens of neighborhoods throughout LA. The idea that this project will not cause any displacement is a false claim as we have seen time and time again.

Response P676-10 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how 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. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project’s environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) The Draft EIR provided sufficient information in order for the public and decision-makers to meaningfully evaluate the proposed Project’s potential environmental impacts. CEQA does not require “a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters” and lead agencies are not required to “provide all information requested by reviewers.” (Id., § 15204.).

Comment P676-11 *Public Services*

The analysis claims that it will not add or alter any existing facilities. However, the Chinatown community has been deprived of services

Response P676-11 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace any housing and is consistent with the proposed Project objectives, the proposed Project was designed in consideration of planned housing projects, including the Restorative Justice Master Plan and Hope Village Project. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region’s most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways,

and freeways, thereby reducing associated air pollution and improving safety. Refer to Section 3.15, Public Services, of the Draft EIR, for discussion of how the construction and operations of the proposed Project would result in less than significant impacts to public facilities including libraries, senior centers, homeless shelters, and daycare facilities.

Comment Letter P677 – Ron Frank

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P677

Comment P677-1 there is SO MUCH that is wrong with this gondola project that it can't all be addressed here. (luckily, the vast volume of arguments _against_ it is 'out there' in the news and social media, so please consider all that too please!) suffice to say: IT'S A BAD IDEA. it's another chavez ravine-style community ravaging, but more subtle and really just way more stupid.

Response P677-1 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. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine.

Comment P677-2 beginning with la art's website's first page, there are nothing but lies, deceptions and misrepresentations..... all trying to distract the public with shiny new community 'benefits' that will only prove to put taxpayers on the hook for this shaky, ill-conceived, but very pretty, bait and switch scheme.

Response P677-2 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. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P677-3 the things it aims to do it can't and won't do: IT WILL NOT REDUCE TRAFFIC CONGESTION OR AIR POLLUTION. period! (there are other ways to get bodies up to the stadium and to reduce auto emissions... the already existing dodger express for example.)

Response P677-3 Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how improving the connection between Los

Angeles Union Station (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 travelling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Comment P677-4 to take the project's objectives seriously is to be fooled into missing the point. this is actually a scam, a slight of hand operation that exists solely to benefit one man and his family. the shell game of entities under whose auspices the project is supposed to be completed by is shameful.

Response P677-4 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the proposed Project's 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. 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 travelling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. 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 P677-5 there are very few large scale projects like this that ever come-in on-time or on-budget. first this was supposed to be 'privately' funded. then metro was somehow involved. now the project has been 'transferred' or 'donated', an orwellian move, just another subterfuge to convey the project to a seemingly beneficially-named organization. everyone knows that frank mccourt is only concerned with his personal financial interests - it's the height of irony having the project stewarded by something as seemingly innocuous as 'climate resolve'. the only climate mccourt wants to resolve is his financial climate.

Response P677-5 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. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to 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, for discussion of how Metro is the proper lead agency for the proposed Project because Metro has primary responsibility for implementation of the proposed Project as the region's transportation authority.

Comment P677-6 and regarding the budget, there's no way this project will be fully funded by its proponents nor will it 'pay for itself'. so exactly what provisions are there to remedy any shortfalls in funding due to unforeseen issues in project construction and maintenance – BESIDES having the taxpayers rescue this boondoggle??

Response P677-6 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. Refer to Response P677-5 regarding proposed Project costs and funding. CEQA does not require speculation as to possible future environmental consequences, and the Draft EIR need not analyze uncertain, hypothetical future events.

Comment P677-7 the gondola project is really a huge impending problem in search of a solid quashing - before it's too late. this whole thing is a bus wreck you can see coming from miles away.

Response P677-7 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. 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 P677-8 once frank mccourt develops his half of the dodger stadium parking lot, there absolutely will be increased traffic and pollution not only in the construction of what is built there, but also from the patrons who will travel to and visit his new retail and restaurant complex. So if he's going to develop his part of the lot, why not just enhance the road capacity to the site and build parking structures there to handle the crowds.

Response P677-8 Refer to 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, for discussion of how the proposed Project solely proposes an aerial gondola system. 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.

Comment P677-9 it's ironic how the conditions the project aims to ameliorate will only set in motion a compounding cascade of outcomes that will only make worse what it proposes to 'resolve'.

Response P677-9 Refer to Response P677-8 for a discussion of how the proposed Project solely proposes an aerial gondola system.

Comment P677-10 i'm not against building things. new is good! but this is the wrong thing in the wrong place for all the greatly wrong reasons.

Response P677-10 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment P677-11 no matter how much the project tries to look pretty or do good for the area, the reality of the project will only bring blight and ruin to every point of its neighborhood contact. (in addition to scooters littering our streets, now there'll be big plastic buses flying over our neighborhood.

Response P677-11 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, which would be less than significant.

Comment P677-12 as well, i've not even addressed the irreparable destruction of wildlife habitat.

Response P677-12 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.

Comment P677-13 as already mentioned, there is so much more to speak to in opposing this debacle in the making. thank you for STOPPING THE GONDOLA PROJECT, TODAY!

Response P677-13 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. 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 Letter P678 – Annalee Harr

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P678

Comment P678-1 This project will not help traffic- this is a bold face lie to benefit the dodgers....

Response P678-1 As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would have a maximum capacity of approximately 5,000 people per hour per direction. 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. Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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.

Comment P678-2 We’ve heard about the expansion they want to do in Elysian Park for Dodger town... this will also be an amenity for all the development of sham TOCs in Chinatown— -- what you are pitching are lies... it’s disgusting...

Response P678-2 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. As discussed in Section 5.0, Corrections and Additions, of the Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park, the City’s second largest park, comprising 575 acres, and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/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. Refer to 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, for a discussion of how the proposed Project solely proposes an aerial gondola system. 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.

Comment P678-3 people will still drive just as people that live in TOCs have cars

Response P678-3 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data.

Comment Letter P679 – Tabatha Yelos

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P679

Comment P679-1 I am writing to express my opposition to the Dodger Stadium Gondola project. I have several concerns about the Draft EIR.

Response P679-1 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. 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 P679-2 through P679-19.

Comment P679-2 My first issue concerns AECOM, the company that prepared the Draft EIR. This company was selected and paid by Frank McCourt and LAART and thus, it is natural that the findings in the EIR would favor the interests of the developer. Every category was found to have "less than significant" impacts despite concerns from the community. I fear that the evaluations in the EIR contain a deep bias in favor of the developer. *Metro should work with the community to select an unbiased entity to conduct the EIR.*

Response P679-2 This is a duplicate of Comment P676-2. Refer to Response P676-2.

Comment P679-3 *Air Quality*

The Air Quality analysis found that the project would reduce VMTs and therefore decrease emissions. I find this hard to believe. As mentioned repeatedly by the community, the project would simply offset the VMTs to another location: either the station at Union Station or the station in Chinatown. People would still have to travel from all over Los Angeles to get to the gondola. The analysis does not account for first and last mile(s- in this case) traveled and therefore I fail to see how the overall emissions would be significantly reduced.

Response P679-3 This is a duplicate of Comment P676-3. Refer to Response P676-3.

Comment P679-4 *Energy Analysis*

Again, in this section the project claims to reduce VMTs without showing how exactly that will happen. The VMTs will simply be displaced to the gondola stations instead of reduced. Further, this analysis claims that the project will increase public transit ridership. This is a broad claim that seems to be based solely on the fact that people will ride the gondola to the stadium, but does not acknowledge that there is no first/last mile(s) solution included in the project and people will still need to drive to the gondola station in order to take it.

Response P679-4 This is a duplicate of Comment P676-4. Refer to Response P676-4.

Comment P679-5 *Greenhouse Gas Analysis*

This analysis claims that GHGs will be reduced because people will not be driving to Dodger Stadium. Again, the analysis fails to acknowledge that the project does not include a first/last mile(s) solution. A lot of Dodger fans live in the San Fernando Valley and in unincorporated East Los Angeles. How will these people get to and from the gondola? The GHGs will be offset, but I fail to see how they will be reduced.

Response P679-5 This is a duplicate of Comment P676-5. Refer to Response P676-5.

Comment P679-6 *Land Use and Planning Analysis*

Contrary to the analysis, the project will most certainly break up the community by breaking up existing walkways that neighborhood residents, especially in Chinatown, use to navigate the neighborhood. Chinatown is the community in LA with the second lowest AMI after Skid Row. It is also an aging community with a lot of elderly residents who will have specific challenges navigating their neighborhood and reaching essential resources during the construction phase and once the project is complete. Their needs have not been taken into account.

Response P679-6 This is a duplicate of Comment P676-6. Refer to Response P676-6.

Comment P679-7 Second, the project does not meet the General Plan of the LA State Historic Park. Trees would need to be cut down in order to build the project. In a City with constantly worsening air quality and increasing temperatures, trees are a vital resource that should be preserved and increased. *An exception to the General Plan should absolutely NOT be granted.*

Response P679-7 This is a duplicate of Comment P676-7. Refer to Response P676-7.

Comment P679-8 *Noise Analysis*

The Draft EIR evaluated LTS for an average person, despite the fact that Chinatown has a growing elderly community with higher noise sensitivities. The age of the existing community should be taken into account when doing these analyses.

Response P679-8 This is a duplicate of Comment P676-8. Refer to Response P676-8.

Comment P679-9 The Draft EIR also mentions a Noise Disturbance Coordinator. Who is this person? Will they be fluent in English, Spanish, Cantonese, Mandarin, and other languages spoken in the area? What powers will they have to address noise complaints? This does not seem to be a sufficient mitigation measure.

Response P679-9 This is a duplicate of Comment P676-9. Refer to Response P676-9.

Comment P679-10 *Population and Housing Analysis*

The project claims that it will not cause any displacement, direct or indirect. However, the potential of the project to increase property values has not been assessed, which

is one of the most significant driving factors of gentrification, which would lead to displacement as we have seen in dozens of neighborhoods throughout LA. The idea that this project will not cause any displacement is a false claim as we have seen time and time again.

Response P679-10 This is a duplicate of Comment P676-10. Refer to Response P676-10.

Comment P679-11 *Public Services*

The analysis claims that it will not add or alter any existing facilities. However, the Chinatown community has been deprived of services over the past couple of years. The public land used for this project should be used for public services that this community needs. Notably, more affordable housing to help abate the housing crisis city-wide and more healthcare services for the aging community in Chinatown.

Response P679-11 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace any housing and is consistent with the proposed Project objectives, the proposed Project was designed in consideration of planned housing projects, including the Restorative Justice Master Plan and Hope Village Project. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Refer to Section 3.15, Public Services, of the Draft EIR, for discussion of how the construction and operations of the proposed Project would result in less than significant impacts to public facilities including libraries, senior centers, homeless shelters, and daycare facilities.

Comment P679-12 *Transportation Analysis*

Again, I reiterate my claim that VMTs would be OFFSET, not reduced. The Draft EIR seems to rely on this A LOT as a condition of the project despite the fact that the analysis is lacking since there is not first/last mile(s) alternative. Further, the project proposes a Traffic Management Plan.

Response P679-12 As discussed in Section 1.0, Introduction, of the Draft EIR, the lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. The proposed Project's ability to reduce vehicular travel is discussed in Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR. 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. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access. As discussed in Section 3.17 implementation of a Construction Traffic Management Plan, as outlined in Mitigation Measure TRA-B, would include street closure information, detour plans, haul routes, and a staging plan during construction to ensure that the impact is less than significant with mitigation incorporated.

Comment P679-13 As we have seen in past developments in the City, these plans are created without community input and radically impact the daily lives of community residents. This is not a sufficient mitigation measure for this community which has unique and diverse needs.

Response P679-13 Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The public input during this period led directly to changes to the proposed Project to incorporate public feedback, including changes to the proposed Project alignment to include the intermediate Chinatown/State Park Station, redesign of the proposed Project stations and junction and additional pedestrian enhancements, including hardscape and landscape improvements. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of outreach and community engagement during the Draft EIR public review period and community engagement efforts during the preparation of the Final EIR. Details pertaining to the Construction Traffic Management Plan (CTMP) and Mitigation Measure TRA-B, are discussed on pages 3.17-67 through 3.17-69 of the Draft EIR. As demonstrated in Section 7.0, Mitigation Monitoring and Reporting Program, of the Final EIR, and Table 7-1, Mitigation Monitoring and Reporting Program (MMRP), of the Final EIR, the MMRP will prescribe for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure.

Comment P679-14 *Wildfire Analysis*

The project claims that it will not interfere with existing fire routes, but fails to consider that the LA infrastructure is falling apart and existing routes are already insufficient for community members. In Mt Washigton, a nearby hillside community, some of the fire routes are not even paved! A more in depth road quality analysis needs to be done here and fire routes need to be updated and a plan to improve these routes needs to be created with community input so that residents can safely evacuate in the event of a fire.

Response P679-14 Refer to Section 3.20, Wildfire, and Appendix P, Fire Hazard Assessment, of the Draft EIR, for an analysis of the proposed Project's potential wildfire impacts and a quantitative wildland fire hazard analysis, respectively. Refer to Topical Response J, Gondola Design and Operations, for discussion of how the Emergency Operations Plan for the proposed Project would include emergency response protocols and safety procedures developed in conjunction with the operator, system provider, and local authorities. Refer to Appendix J, Reax Memo re Attorney General Guidance, for a discussion of how the Draft EIR complied with recent California Attorney General Guidance for analyzing wildfire risks under CEQA, including with respect to emergency access. Consistent with this guidance, the Draft EIR's analysis took into account that the proposed Project would primarily occur within an existing urbanized area, and provided an assessment of local fire history, site characteristics, and anticipated fire hazards. As discussed in Section 3.20, construction or operation of the proposed Project would not substantially impede adopted emergency response or emergency evacuation plans during an emergency spurred by a wildfire. The Draft EIR considered potential construction impacts to major interstates, highways, and primary arterials that could serve as evacuation routes within the proposed Project area, including Cesar E. Chavez Avenue, Alameda Street, Spring Street, North Broadway, and the SR-110. While construction of the proposed Project would require temporary road closures, evacuations in urban areas similar to the proposed Project typically are completed in discrete phases at the direction of local authorities and generally do not involve mass evacuations. Larger wildfires are actively tracked, allowing authorities hours or days to adjust evacuation strategies and to facilitate strategic evacuation of discrete areas. While road closures and roadway disruptions would be temporary and intermittent throughout construction of the proposed Project and would be in coordination with LADOT, emergency access would be maintained and construction activities would be quickly halted, as necessary, in the event of an emergency in coordination with LAFD and LAPD.

As discussed in Section 3.17, Transportation, a Construction Traffic Management Plan would be prepared as part of the proposed Project, which is included as Mitigation Measure TRA-B. The Construction Traffic Management Plan for the proposed Project would identify potential fire evacuation routes and construction equipment storage areas to ensure that equipment would not be stored within the roadways to allow for

emergency access, if needed. The Construction Traffic Management Plan would require coordination with the City and emergency service providers to ensure emergency access is provided to the proposed Project alignment and component sites and neighboring businesses and residences. Emergency access points will be marked accordingly in consultation with LAFD, as necessary.

Accordingly, the Draft EIR considered the proposed Project's potential evacuation impacts during construction and operation for area roads that could be used for evacuation or emergency access, concluding that the proposed Project would result in less than significant impacts. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact, such as the road quality analysis requested by this commentor. (See, e.g., CEQA Guidelines § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (Id., § 15204.)

Comment P679-15 *Project Alternatives*

The idea that the proposed project alternatives would not meet the goals of the proposed gondola project is absurd. Properly expanding the existing bus line to Dodger Stadium would do everything that the LAART project aims to do without disrupting the surrounding community.

Response P679-15 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, and Section 4.0, Alternatives, of the Draft EIR, for a discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express 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.

Comment P679-16 The goals of the project are broad and the claim that ONLY a gondola project would meet these goals is unfounded - again, a product of a biased evaluation by a company that was handpicked by the developer.

Response P679-16 Refer to Response P679-2 for a discussion of how the Draft EIR reflects Metro's independent judgment and how AECOM was selected from Metro's roster of environmental consultants. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the proposed Project's 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. The proposed Project's 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. Aerial rapid transit technology has the ability to overcome grade and elevation issues between LAUS and Dodger Stadium in order to provide a direct transit connection between the two locations, and provide 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. Thus, because the proposed Project's fundamental purpose is to provide a permanent transit connection to Dodger Stadium, and because aerial rapid transit technology can achieve this fundamental purpose, the objectives for the proposed Project are in compliance with CEQA, which does not restrict an agency's discretion to identify and pursue a particular project designed to meet a particular set of objectives. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Comment P679-17 *Parking Study*

The parking study evaluated parking spots withing 0.5mi of the project stations. 0.5mi is way too far of a range. Most people do not park that far away and then walk to a public transit hub. It would be far easier to take a rideshare to the stadium than walk 0.5mi to the gondola station. A better range would be 0.2mi. If we evaluate the parking in that range, I'm sure you will find that there is not neraly enough parking in the area.

Response P679-17 Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the 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. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which

is based on extensive data sources and assumptions validated by data, and pre-game and post-game transportation.

Comment P679-18 Also, the fact that this section acknowledges that parking will be necessary to the project directly contradicts the claim that the project will reduce VMTs - instead, it support the claim that VMTs will simply be offset. There is certainly not enough parking around the project and not does the surrounding community want to be used as a giant parking lot. The community has urgent needs, like the need for more affordable housing and a nearby hospital, that need to be addressed. This project overlooks all of this in favor of parking spots - this is a offensive to the lives of community members.

Response P679-18 Refer to Response P679-12 for discussion of VTM reductions, and Response P679-17 for discussion of parking. Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR, for details regarding the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. As detailed in Appendix N, based on existing data and conservative assumptions, the estimated non-vehicle mode of access (e.g. access by transit, walk, bike) is 67.5%. The main VMT reduction benefit of the proposed Project would come from travelers shifting from driving to Dodger Stadium to taking transit. The VMT change associated with some riders who park and ride rather than park at Dodger Stadium are factored into the analysis but are a minor in their effect given the proximity of the LAUS and Chinatown areas to Dodger Stadium. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety.

Comment P679-19 Commissioners, I remind you that you have a DUTY to protect the lives and interests of LA residents, and not of LA developers. You have a responsibility to help address the needs of the LA community, and not the desires of LA billionaires. This City is in a serious housing crisis - I'm sure I do not need to explain to you how bad the situation on the streets of this City is. We need to use PUBLIC LAND to address the urgent needs of our City and provide PUBLIC BENEFITS. Please, we are begging you, be responsible with you decisions and help our community that is in such dire need! Take a stand against this project that will bring so much harm and instead bring services that we so urgently need.

Response P679-19 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. 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. 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. 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. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, and Topical Response N, Environmental Justice, for discussion of how the proposed Project will not displace housing, prevent planned housing, or preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities. 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 Letter P680 – Valerie Albicker

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P680

Comment P680-1 My name is Valerie Albicker and I am a LAUSD teacher and lifelong Angelino community member. I want to express reasons for opposition to the Aerial Rapid Transit Project (Gondola at Dodger Stadium). As a resident of city council district #13 and who works with my students in Chinatown and neighboring communities, my students and families will be negatively impacted by this project.

Response P680-1 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. This comment provides a general summary of the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses P680-2 through P680-5.

Comment P680-2 The environmental damage and impact of the development, including obstructed views, will bring more light pollution to the surrounding homes and areas. Any lighting or towers will be a nuisance to homes and families.

Response P680-2 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, 3.16, Public Services, 3.17, 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 K, Signage and Lighting, for discussion of the proposed Project lighting would include low-level lighting for security and wayfinding purposes. 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, which would be less than significant, including for lighting.

Comment P680-3 The impact of traffic also brings more air pollution into the dense area, further compounding the quality of health of community members that live in the area. Surrounding Chinatown and Union Station is the 101 and 5 FWY, the project will bring additional traffic into the area that affects pedestrians and residents of the area.

Response P680-3 Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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. 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 the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project’s Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project’s stations.

Comment P680-4 With any development, families, such as my students living at the poverty level, are priced out and displaced as one of the consequences of gentrification.

Response P680-4 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how 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.

Comment P680-5 In addition to the environmental damage, traffic and displacement of the families I serve, there is the matter of financial transparency. There was no open public process or competitive bidding for this project. How is this project being funded and its ongoing maintenance? Communities, directly impacted by this plan, were not invited to voice whether or not this project is truly an improvement or value to its members!

Response P680-5 This comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro’s sole source determination for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project’s public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project’s scope of environmental review under CEQA. In June 2021, the Project

Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. 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. 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.

Comment P680-6 Thank you for taking the time to review my opposition and concerns for residents directly impacted. If you have any questions, please feel free to contact me at 310-869-5033.

Response P680-6 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. 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 Letter P681 – Annalee Harr

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P681

Comment P681-1 Also earthquakes.....

Response P681-1 Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR and Appendix F, Memo on Structural Engineering, of the Final EIR for discussion of how the proposed Project would meet applicable standards, requirements, and building codes and would have less than significant impacts related to geology and soils, including seismic activities, upon implementation of Mitigation Measures GEO-A.

Comment Letter P682 – Jasmine Perez

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P682

Comment P682-1 Deputy Executive Officer Cory Zelmer,

I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P682-1 This comment indicating opposition to the Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P683 – Peter Straus

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P683

Comment P683-1 Keep me up to date on the proposed LA. Gondola System.

Thanks!

Response P683-1 This comment is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P684 – Rainey Chevako

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P684

Comment P684-1 Hello, I am an LA citizen who is writing to express my opposition to the proposed gondola to Dodger's stadium. I am concerned over the aesthetic and cultural damages it will inflict on my community and the lack of benefit it provides the people who actually live in this city.

Response P684-1 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. 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, which would be less than significant. The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation.

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. 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. 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. 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 P684-2 I also strongly oppose the potential cultural damage this will do to the city, as developments such as this may lead to future commercial development and gentrification in an area that has already been subject to much development.

Response P684-2 Refer to Response P684-1 for a discussion of the proposed Project's potential impacts to cultural resources. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how 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. Also refer to 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, for discussion of how the proposed Project solely proposes an aerial gondola system. 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. In addition, the proposed Project would provide an additional transit option for surrounding residents in Chinatown, and as discussed in Section 3.14, Population and Housing, of the Draft EIR, is not anticipated to substantially generate new development.

Comment P684-3 Furthermore, it provides no solution to the issue of traffic to and from Dodger Stadium.

Response P684-3 The proposed Project's ability to reduce vehicular travel is discussed in Section 3.17, Transportation and Appendix N, Transportation Appendices, of the Draft EIR. 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. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT.

Comment P684-4 This community is where I grew up and where I went to school. The people who live there should have *their *needs met, rather than having the needs of billionaire investors forced on them. Please reconsider this project.

Response P684-4 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. 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. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities.

Comment Letter P685 – Sandra Choi

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P685

Comment P685-1 Hello,

I support the innovative and zero emission Gondola project, and I appreciate the goal of 35% which is unprecedented for local, small, diverse, and DVBE businesses.

This will help to create jobs and economic recovery for our community.

Response P685-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response N, Environmental Justice, for discussion of how the Project Sponsor has committed to a goal of 35 percent utilization of 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 during the proposed Project's construction phase.

Comment Letter P686 – Jose Mancera

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P686

Comment P686-1 The Daily breeze provided this email for public comments on the proposed Gondola.

Request that there:

1

BE NO GONDOLA created over China Town. This project will not have much benefit to the citizens of Los Angeles. This design and rationale is only for the few moments in a month that it would be used, so essentially it will not be used much at all, you can say that this is a project of:

Response P686-1 Refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses in Chinatown. 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.

Comment P686-2 THE GONDOLA TO NO WHERE.

Mainly to be used during a day of games, it will therefore be

- costly and
- an unsightly hazard
- with many negative impacts to the China Town community

Response P686-2 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. The proposed Project would address a need for a permanent transit connection to one of the region's most visited venues, Dodger Stadium, and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. 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. Refer to Topical Response

L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project. 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. As discussed in Section 3.01, Aesthetics, of the Draft EIR, the proposed Project would have less than significant impacts related to aesthetics. 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. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown 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 Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features.

Comment P686-3 2

There are many hazards associated with this concept that are swept under the rug and not included in a balanced perspective.

Response P686-3 Refer to Section 3.09, Hazards and Hazardous Materials, of the Draft EIR, for discussion of how the proposed Project would have less than significant impacts related to hazards and hazardous materials with implementation of Mitigation Measures HAZ-A and HAZ-B. 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 safety features of the proposed Project and how aerial transit systems such as the proposed Project represent one of the safest modes of transportation relative to other forms of transit.

Comment P686-4 2.1 There is constant danger of falling debris from the gondola to the ground. There is no guarantee that it will be 100% enclosed and liquids and other items may be dropped.

Response P686-4 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.

Comment P686-5 2.2 If it is enclosed, there is no air conditioned service to allow fresh comfortable air to be inhaled. Over time, people will trash and urinate (sorry, it is a reality) check the bus and tram lines now, and stink up the ride.

Response P686-5 Refer to Topical Response J, Gondola Design and Operations, for discussion of how gondola cabins can be removed for routine maintenance. Refer to Response P686-4 regarding the ventilation system. Further, cabins are anticipated to have transit-friendly surfaces that account both for durability and for ease of cleaning. Operating procedures would be developed to reflect appropriate cleaning and maintenance requirements.

Comment P686-6 2.3

The community of Chinatown will bear the stigma of other's poor stewardship.

Response P686-6 Refer to Response P686-2 for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, how the proposed Project supports Metro's goal of prioritizing equity opportunities and is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment. Public outreach for the proposed Project was designed with environmental justice principles in mind. The proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. The proposed Project is also designed to be ADA compliant.

Comment P686-7 2.4

There will be graffiti on the walls and windows and cut up fabric or switch blade carved out messages on the plastic seats.

Response P686-7 As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would require routine maintenance that would be performed by the system operator. Operating procedures would be developed to reflect appropriate cleaning and maintenance requirements. Refer to Responses P686-4 and P686-5 for discussion of daily maintenance and cleaning of proposed Project cabins.

Comment P686-8 2.5

There is no plan to do several-times-a-day daily Corona virus sanitizing of each Gondola and associated equipment cleaning - like every 30 minutes. This would require a person on staff to ride with each trip and sterilize the cabin for each trip. Where is the request to pay for these services? Where is the requirement to change scratched and graffitied windows and walls and seating each day that this occurs?

Response P686-8 Refer to Response P686-7 for discussion of daily maintenance and cleaning of proposed Project cabins.

Comment P686-9 2.6

Just look at the buses and bus stops and see for yourself that graffiti and vandalism will mirror the Gondolas without adequate cleaning. Did the MTA promote good stops? Why is this not so in many areas?

Response P686-9 Refer to Response P686-7 for discussion of daily maintenance and cleaning of proposed Project cabins. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of how 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.

Comment P686-10 2.7

There is no requirement to have the gondola's windows cleaned every hour or so to keep them clean and shining as other countries would do. A terrible unsightly Gondola system will be evident in a few months time and yet this is to be hung over a community that has been mistreated across the generations, such as railroad workers in dangerous jobs.

Response P686-10 Refer to Response P686-7 for discussion of daily maintenance and cleaning of proposed Project cabins. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of how 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. 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 Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park.

Comment P686-11 2.8

Have you ridden the Amtrak train? I have. You will see massive graffiti and absolute filth along the tracks for a few miles out of Union Station, that is the true view of what they think of LA. this project will only contribute to that.

Response P686-11 Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of how 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. Refer to Response P686-7 for discussion of daily maintenance and cleaning of proposed Project cabins.

Comment P686-12 2.9

Family and children and visitors will be at risk for dangerous cable failures of the gondolas.

Response P686-12 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 safety features of the proposed Project and how aerial transit systems such as the proposed Project represent one of the safest modes of transportation relative to other forms of transit. 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 P686-13 2.10

Why isn't there a similar plan over Beverly Hills? Over Marina Del Rey? Over La Canada? Only the poorer areas are giving the shaft.

Response P686-13 Refer to Response P686-2 for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities and the proposed Project's commitment to environmental justice. 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. 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. 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 P686-14 2.11

What is the percentage of the "person-hours metric" expected for the 95% of the time that there is no game? It is a waste of funds. This metric needs to be identified per hour basis over the visit of six months with proper charts to easily show the time this is used by people.

Response P686-14 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. Refer to Section 2.1, 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. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queueing at stations, and pre-game and post-game transportation. Further, Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR.⁵ 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

⁵ Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.

appropriate to use for the analysis and that they agreed with the ridership forecasts in the Draft EIR.

Comment P686-15 2.12

There should have been several options proposed to this “traffic congestion” problem for game times.

What are they?

When were they discussed?

Why weren’t they provided?

Response P686-15 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR’s consideration of a range of reasonable alternatives, properly identifying an “environmentally superior” alternative and analyzing a “No Project” alternative, pursuant to CEQA.

Comment P686-16 Why was this a sole-bid contract? Just because the company provided the initial plans, it should not go to them by default.

Response P686-16 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. Nevertheless, this comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro’s sole source determination for the proposed Project.

Comment P686-17 2.12

Better use of the funds for all of Los Angeles would be to extend one of the Fwy off ramps leading into the Griffith Park to get to the stadium, like the exit southbound on the 2 Fwy. I have driven by there for years commuting to JPL. There is heavy congestion and stress there in changing lanes every time.

Response P686-17 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 Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. 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 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 travelled. The proposed Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles travelled.

Comment P686-18 2.13

A better solution than the Gondola is to make all streets One Way towards the stadium at game time. All officers would prepare and direct traffic along each intersection for this to go smoothly.

Response P686-18 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives, properly identifying an "environmentally superior" alternative and analyzing a "No Project" alternative, pursuant to CEQA. The proposed alternative would fail to meet the basic project purpose and underlying project objectives of providing a sustainable form of transit to Dodger Stadium.

Comment P686-19 2.14

The poor decision to build the stadium where it is, is not for the people of Los Angeles to be expected to pay for their poor business decision. That organization already maltreated and expelled under malevolent intent, to remove poorer residents from their homes in Chavez Ravine to build this stadium, and now the injustices continue.

Response P686-19 Refer to Response P686-2 for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Refer to Response P686-6 for discussion of the proposed Project's commitment to environmental justice. Refer to Section 5.0, Corrections and Additions, of this Final EIR, for a discussion of Chavez Ravine.

Comment P686-20 2.15

Bicyclist will not be able to be accommodated with their bikes on the Gondola. They would need many bike racks for locking their bikes. Even so, they risk their bikes being stolen during the game. It will take much real estate to adequately feed the Gondola Stations.

Response P686-20 The Draft EIR addressed bicycle facilities in Section 2.0, Project Description, and Section 3.17, Transportation, of the Draft EIR. As discussed on page 3.17-43, the proposed Project cabins would accommodate bicycles and could be used to further bicycle access for riders. While bicycle parking would not be provided at the Alameda Station next to LAUS, which has its own bicycle hub, the Chinatown/State Park Station is proposed to 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 and individual bike lockers. As discussed in Section 5.0, Corrections and Additions, of the Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park, the City's second largest park, comprising 575 acres, and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/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.

Comment P686-21 2.16

Additional car parking and motorcycle slots and e-bike slots are required way beyond what is already at union station, now not adequate at all. Have you parked there before? It is a stressful process. I have. You are just moving part of the congestion to this area, that is already not adequate for the citizens of LA, what new massive parking structures would you add - is it part of the proposal?

Response P686-21 Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the 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. 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 the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. By providing efficient, high-capacity, and faster alternative access to Dodger Stadium for games and special events, overall vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, would

be reduced by the proposed Project because of game/special event attendees shifting to riding public transit rather than driving to Dodger Stadium.

Comment P686-22 2.17

The additional noise of the Gondolas are an added sound hazard to the Chinatown's residents. This extra background noise has an expected decimal noise increase - what is that? Is the regular existing street noise already above safety standards? So will the new levels be on top of that?

Response P686-22 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the operational noise impacts from the proposed Project, which would be less than significant. As demonstrated on Table 3.13-10, in Section 3.13, existing ambient noise levels in the vicinity of the proposed Project were measured based on Lday, Lnight, Ldn, and CNEL. Existing Lday ambient noise levels in the Project area range from 53.6 to 69.8 dBA and existing Lnight ambient noise levels in the Project area range from 48.7 to 65.5 dBA. As demonstrated on Tables 3.13-22, 3.13-23, 3.13-24, and 3.13-25 on pages 3.13-53 to 3.13-58 of Section 3.13, the operational noise impacts would be less than significant at all receptor locations based on the L.A. CEQA Thresholds Guide, Federal Transit Administration (FTA) guidelines, and Los Angeles Municipal Code (LAMC). Specifically, as demonstrated on Table 3.13-23 based on the LAMC analysis the proposed Project would result in an increase in ambient noise levels ranging from 0.0 to 4.1 dBA (including both Leq(day) and Leq(night)). The increases are all below the the 5 dBA Leq LAMC threshold and no operational impact would occur under the worst-case scenario that assumed the highest line speed, cabins per hour, and queueing numbers, and nighttime operations. In addition, refer to Responses GO17-129 and GO17-130 for discussion of the proposed Project's less than significant impact on human health associated with hearing loss, hearing damage, and sleep disturbance.

Comment P686-23 2.18

I would like to have the mayor and her staff and the developers move to continuously work, as mandatory, at this location to work in this hazardous new condition.

Response P686-23 Refer to Response P686-22 for a discussion of how the proposed Project would result in less than significant operational noise impacts. Refer to Section 3.09, Hazards and Hazardous Materials, of the Draft EIR, for discussion of how the proposed Project would have less than significant impacts related to hazards and hazardous materials.

Comment P686-24 2.19

The bases/towers are to be requiring clean maintenance and it will be a big unpleasant footprint that will massively support this weight - three massive towers.

Response P686-24 As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would require routine maintenance that would be performed by the system operator.

Operating procedures would be developed to reflect appropriate cleaning and maintenance requirements. In addition, refer to Topical Response C, Project Features, discussing how the individual components of the proposed Project would be designed to weave seamlessly into the surrounding urban fabric. The proposed Project's design would take cues from the immediate neighborhood culture, and each component of the proposed Project, including Alameda Tower and Alpine Tower, would be designed to complement and reflect the unique character of the surrounding area.

Comment P686-25 2.20

What are the hours of operation? Will it be available 24/7? Has it been promised? What will happen when the developers want to cut back operating hours because it is not cost effective daily, only during the game

Response P686-25 As discussed in Section 2.0, Project Description, of the Draft EIR, it is anticipated that the proposed Project would provide daily service between 6:00am to 12:00am, subject to operational changes in response to ridership demand, 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. 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 P686-26 2.21

Have the infrastructure to water fountains and restrooms access been included in this budget? Including maintenance to first-rate world-class maintenance and cleanliness?

Response P686-26 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 how maintenance would be performed by the operator and would include daily observation of the overall system as part of the startup routine. 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. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P686-27 2.22

What are the traffic metrics now for traffic and for “after project completion”? If they are way off after completion will it be shut down? A total folly.

Response P686-27 Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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. Refer to Response P686-21 for discussion of how traffic congestion is not required to be analyzed in the Draft EIR under CEQA.

Comment P686-28 Please seek out the full truth of the many negative consequences to China Town and the people of Los Angeles, as you work to understand all the pros and cons in this decision. I believe that the best decision is to

CANCEL THE “GONDOLA TO NO WHERE FOLLY” PROPOSED PROJECT

Response P686-28 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. Refer to Topical Response C, Project Features, discussing the proposed Project’s potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown 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 Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project’s potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language.

Comment Letter P687 – Phyllis Ling

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P687

Comment P687-1 Dear Mr. Zelmer,

I am OPPOSED to the LA ART Gondola Project.

Please include my comment letter and supporting document in the official file for the DEIR.

Sincerely,

Phyllis Ling

Response P687-1 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. All comments on the Draft EIR are included in Appendix C, Public Comments on the Draft EIR, and Appendix B, Public Hearing Transcripts, of the Final EIR. Consistent with CEQA, comments received on the Draft EIR were responded to in the Final EIR. The comment letter referred to in this comment is Comment Letter P700. Refer to Responses P700-1 through P700-69.

Comment Letter P688 – Andy Sklawer

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P688

Comment P688-1 Dear Mr. Cory Zelmer,

I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution.

Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Sincerely,

Andy Sklawer

Response P688-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration.

Comment Letter P689 – G. Smith

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P689

Comment P689-1 To whom it may concern:

Regarding the LAART gondola proposal, it is my opinion that the proposed project be approved because it would provide a valuable transportation resource to those who want to patronize Dodger stadium and various surrounding places of interest.

By having gondolas ferrying people to various venues without the need to clear or otherwise physically harm, historic structures and/or areas, would provide a transportation option that is carbon neutral, would help to reduce traffic congestion and take advantage of unused air space.

Such a project may become a tourist attraction and be a great photography and social networking bonanza, which could infuse much needed and appreciated, money into the economy.

Response P689-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. 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. 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 P689-2 Although cluttering Los Angeles's air space with support towers, cables and gondolas is a liability, unfortunately Los Angeles lacks much of a historical skyline or natural features that such things would harm anyway.

Ideally a vertical take-off and landing (VTOL) airport would be constructed at or near the historic train station and electric VTOL aircraft would ferry passengers to local destinations autonomously and on-demand; but until such a day comes to light, the gondolas would provide much benefit to Los Angeles's residents and visitors alike and as such, would be a refreshing asset to this great city.

Thank you.

Response P689-2 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, which would be less than significant, including to scenic or panoramic views such as the downtown Los Angeles skyline.

Comment Letter P690

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Comment Letter P691

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Comment Letter P700 – Phyllis Ling

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to P700**Comment P700-1 I. PROCEEDURAL DEFECTS IN THE DEIR REQUIRE ITS INVALIDATION AND RECIRCULATION****A. The DEIR Is Defective Due To Its Identifying The Wrong Lead Agency.**

As shown in the Figure immediately above, the vast majority of the property affected by the Project is property under City or other governmental agency control, rather than Metro control. As detailed at DEIR pages 2-57 to 2-62, the preponderance of the discretionary approvals required for the Project are required from the City of Los Angeles. Per DEIR page 2-61, the following permits are required from Metro:

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.

Response P700-1 Refer to 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, for discussion of how Metro is the proper lead agency for the proposed Project because Metro has primary responsibility for implementation of the proposed Project as the region’s transportation authority. Metro is the proper lead agency for the proposed Project. Under CEQA, a lead agency is the public agency with the greatest responsibility for supervising or approving the project as a whole.” (CEQA Guidelines, §15051(b).) Under state law, Metro has broad authority over public transportation planning and coordination for the Los Angeles region’s transportation system and is authorized to do “any and all things” to carry out these purposes. (Public Utilities Code, § 130105(f).) For the proposed Project, Metro is tasked with considering approval of all plans for design, construction, and implementation under Public Utilities Code section 130252, as well as with

consideration of the written approvals to operate the proposed Project, pursuant to its authority under Public Utilities Code section 130252. Thus, Metro has primary responsibility for implementing the proposed Project and integrating it into the regional transportation system, consistent with Metro's statutory purpose. Metro is the appropriate lead agency for the proposed Project. As discussed in Topical Response D, Metro consulted with CEQA responsible agencies, including the City of Los Angeles. Refer to Appendix A, Scoping Report, of the Draft EIR, and Appendix A, Public Outreach Report, of the Final EIR, for documentation of notice to responsible agencies at various stages in the environmental review process.

Comment P700-2 It should be noted that Public Utilities Code Section 130252 only relates to approval of a project description, and not detailed project plans, specifications, and estimates as noted in PUC Section 130252(c).¹ Which public agency will be responsible for approval of the detailed project plans, specifications and estimates for this private project and pursuant to what authority?

Footnote 1: <https://law.justia.com/codes/california/2021/code-puc/division-12/chapter-4/article-3/section-130252/>.

Response P700-2 This comment provides a general recitation and characterization of statutes, case law, and regulations. Refer to Response P700-1 for a discussion of how Metro is the appropriate lead agency for the proposed Project, consistent with its statutory authority under Public Utilities Code section 13052. Refer to Section 2.0, Project Description, for an overview of the potential discretionary entitlements, reviews, and approvals required for implementation of the proposed Project. Section 2.0 outlines the various agencies that could approve aspects of the proposed Project pursuant to their regulatory and statutory authority, including Caltrans, California State Parks, Cal/OSHA, Metro, and the City of Los Angeles.

Comment P700-3 Furthermore, it should be noted that PUC Section 130252(a) specifies that: "No such plan shall be approved unless it conforms to the appropriate adopted regional transportation plan pursuant to Chapter 2.5 (commencing with Section 65080) of Title 7 of the Government Code." A determination of conformance by the Southern California Association of Governments (SCAG), which prepares the Regional Transportation Plan (RTP), is thus needed before it can be assumed that Metro has plan approval power. Given that the Project is not included in the Federal Transportation Improvement Program² (FTIP) or the Transportation System Project List³ used in developing the current Regional Transportation Plan/Sustainable Communities Strategy, RTP/SCS) it is questionable whether the Project is consistent with the RTP, and thus whether Metro is the appropriate Lead Agency. All of these issues should be resolved as part of public processes prior to proceeding with any DEIR process for the Project.

Footnote 2: <https://scag.ca.gov/sites/main/files/file-attachments/21-05-lafinalcomparison.pdf?1624490178>

Footnote 3: See: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_projectlist_0.pdf?1606000813

Response P700-3 This comment provides a general recitation and characterization of statutes, case law, and regulations. Refer to Section 1.0, Introduction, of the Draft EIR, pages 1-6 to 1-8, and Appendix N, Transportation Appendices, of the Draft EIR, for analysis of the proposed Project’s consistency with each of the goals of the SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), or “Connect SoCal.” Refer to Topical Response A, SB 44, for discussion of how the proposed Project is consistent with the goals of Connect SoCal, as 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, and would otherwise reduce greenhouse gas emissions by reducing VMT. Refer to Response P700-1 for a discussion of how Metro is the appropriate lead agency for the proposed Project. Consistent with CEQA Guidelines section 15004(b), the Draft EIR was “prepared as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment.”

Comment P700-4 The following discretionary approvals are required from the City per DEIR page 2-61 to 2-62:

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.

Response P700-4 This comment provides a characterization of an excerpt as well as an excerpt from the Draft EIR. 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 P700-5 CEQA Guidelines Section 15051 establishes the criteria for identifying the lead agency, as follows:

15051. CRITERIA FOR IDENTIFYING THE LEAD AGENCY

Where two or more public agencies will be involved with a project, the determination of which agency will be the Lead Agency shall be governed by the following criteria:

(a) If the project will be carried out by a public agency, that agency shall be the Lead Agency even if the project would be located within the jurisdiction of another public agency.

(b) If the project is to be carried out by a nongovernmental person or entity, the Lead Agency shall be the public agency with the greatest responsibility for supervising or approving the project as a whole.

(1) The Lead Agency will normally be the agency with general governmental powers, such as a city or county, rather than an agency with a single or limited purpose such as an air pollution control district or a district which will provide a public service or public utility to the project.

(2) Where a city prezones an area, the city will be the appropriate Lead Agency for any subsequent annexation of the area and should prepare the appropriate environmental document at the time of the pre zoning. The Local Agency Formation Commission shall act as a Responsible Agency.

(c) Where more than one public agency equally meet the criteria in subdivision (b), the agency which will act first on the project in question will normally be the Lead Agency.

(d) Where the provisions of subdivision (a), (b), and (c) leave two or more public agencies with a substantial claim to be the Lead Agency, the public agencies may by agreement designate an agency as the Lead Agency. An agreement may also provide for cooperative efforts by two or more agencies by contract, joint exercise of powers, or similar devices.

It would appear that the City of Los Angeles has the greatest responsibility for supervising or approving the Project as a whole, and thus that Metro has improperly assumed the lead agency role.

Response P700-5 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to 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, for discussion of how Metro is the proper lead agency for the proposed Project and the City’s participation in the environmental review process as a CEQA responsible agency. Refer to Response P700-1 for a discussion of how Metro is the appropriate lead agency for the proposed Project.

Comment P700-6 In addition, as detailed in this comment letter, the DEIR delegates responsibility for multiple mitigation measures to the City, yet only the City’s Los Angeles Historical Monument Authority Department commented on the Notice of Preparation (NOP) for the Project. This is probably because the Notice of Preparation (NOP) failed to identify the important discretionary approvals required from agencies other than Metro.⁴ Was the issue of the appropriate Lead Agency discussed with the City? Has an application for the Project been filed with the City?

Footnote 4: A copy of the NOP is available at:

https://files.ceqanet.opr.ca.gov/264989-2/attachment/rT6WZKxmAw5CCIASDTjN44ccsce8vIZo9I0VPcsZ2kSQAmO_aTD_KV1zEK1cpY0i6HAgSo12LpLfcDZ0

Response P700-6 Refer to 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, for discussion of how Metro is the proper lead agency for the proposed Project and the City’s participation in the environmental

review process as a CEQA responsible agency. As the agency tasked with planning, operating, and coordinating funding for the Los Angeles Region's transportation system, Metro has primary responsibility for implementation of the proposed Project, and is the proper lead agency. Under CEQA, where two or more public agencies meet the criteria for acting as lead agency, the agency that acts first will normally serve as lead agency. (CEQA Guidelines, §15051(c).) Metro elected to serve as lead agency, and the City has cooperated as a responsible agency, including consultation in preparation of the Draft EIR. Refer to Appendix A, Scoping Report, of the Draft EIR, and Appendix A, Public Outreach Report, of the Final EIR, for documentation of notice to responsible agencies at various stages in the environmental review process. Public Resources Code section 21092(b)(1) specifies the requirements for what must be included in an NOP, including the date, time, and place of any public meetings or hearings on the proposed project; a brief description of the proposed project and its location; and the significant effects on the environment, if any, anticipated as a result of the project (Public Resources Code § 21092(b)(1); CEQA Guidelines § 15082(a)(1).) CEQA does not require the NOP to identify all discretionary approvals required for a project, nor could it, given the NOP is issued in the early stages of the environmental review process before all discretionary approvals required can be known. Refer to 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, for discussion of Metro's consultation with CEQA responsible agencies. Metro has complied, and will continue to comply, with the CEQA requirements for consultation with responsible agencies at each stage of the environmental review process. This consultation process has included meetings with Metro and the responsible agencies to discuss the scope of environmental review, additional consultation with the City and State Parks as Draft EIR preparers, and comments from responsible agencies on the Draft EIR. This consultation process will continue throughout the course of the environmental review process. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how the City will conduct its own discretionary review process for the Project approvals it is responsible for.

Comment P700-7 B. The DEIR Is Further Defective In Failing to Identify and Consult with all Responsible and Trustee Agencies.

The DEIR is under-inclusive in identifying and consulting with all responsible and trustee agencies required under CEQA. As a result, the DEIR violates a core CEQA procedural mandate.

The DEIR identifies as "responsible agencies consulted" only certain City of Los Angeles departments, the City of Los Angeles El Pueblo Historical Monument Authority, and the California Department of Parks and Recreation. (DEIR pp. 8-4 & 8-5.) However, the DEIR lists several other agencies with approval authority over parts

of the Project. (DEIR pp. 2-57, 2-61 & 62.) All of these should have been named and consulted as responsible agencies.

As the DEIR acknowledges, permits and approvals will be required from several different agencies, including the California Department of Transportation (Caltrans), California State Parks, and Cal/OSHA. The City of Los Angeles has the most approval authority over the Project, and is the most logical lead agency for this and other reasons, including accountability by elected officials (the Los Angeles City Council) to the public, as opposed to the Metro Board, which is not elected. Because Metro has approval authority over some parts of the Project (DEIR p. 2-61), but far fewer in number than the City of Los Angeles. (DEIR pp. 2-61 & 2-62), Metro itself should be a responsible agency, not the lead agency.

Response P700-7 Refer to Section 1.0, Introduction, of the Draft EIR, for discussion of the CEQA Responsible and Trustee Agencies. Refer to Section 2.0, Project Description, of the Draft EIR, for a list of required permits and approvals from responsible agencies for the proposed Project. Refer to Response P700-6 for discussion of Metro’s consultation with responsible agencies. Refer to Response P700-5 for discussion of how Metro is the proper lead agency for the proposed Project.

Comment P700-8 In addition, we believe other public agencies must be named as responsible agencies and consulted as CEQA requires. This includes the Public Utilities Commission (PUC). Because, inter alia, the Project would cross over and above railroad tracks, PUC review and approvals are required, with proper public notice and full public hearing processes provided. Also, the Santa Monica Mountains Conservancy is a responsible agency and/or trustee agency under CEQA. (Pub. Res. Code § 33105.) Similarly, the Housing and Community Development Dept. has approval authority as to part of the Project under the Surplus Land Act, which applies to some of the parcels and large street areas proposed for use as part of the Project.

All responsible agencies were required to be identified as responsible agencies and consulted early in the CEQA process. The under-inclusion/omission of responsible agencies, and the mis-attribution of lead agency role to Metro, creates an insurmountable flaw that renders the DEIR void ab initio.

Guidelines Section 15381 provides: “For the purposes of CEQA, the term ‘responsible agency’ includes all public agencies other than the lead agency which have discretionary approval power over the project.”

Further, Pub. Res. Code § 21080.4(a) provides in pertinent part:

“If a lead agency determines that an environmental impact report is required for a project, **the lead agency shall immediately send notice of that determination** by certified mail or an equivalent procedure **to each responsible agency** Upon receipt of the notice, **each responsible agency . . . shall specify to the lead agency the scope and content of the environmental information that is germane**

to the statutory responsibilities of that responsible agency . . . in connection with the proposed project and which, pursuant to the requirements of this division, shall be included in the environmental impact report.” Pub. Res. Code § 21080.4(a) (emphasis added).

See also Guidelines § 15096(b)(2): the responsible agency “shall specify the scope and content of the environmental information which would be germane to the responsible agency’s statutory responsibilities in connection with the proposed project. The lead agency shall include this information in the EIR.” Guidelines Section 15005(a) provides: “‘Must’ or ‘shall’ identifies a mandatory element which all public agencies are required to follow.”

The DEIR’s failure to name and specially serve and seek comment from all responsible (and trustee) agencies constitutes a procedural violation that independently renders the DEIR invalid. This failure has also caused Metro to violate CEQA’s substantive requirements for full environmental disclosure by failing to obtain the expert views and comments of agencies with specialized knowledge of particular environmental and other issues and concerns.

“The purpose of allowing the public and other governmental agencies the opportunity to review EIRs include: sharing expertise, disclosing agency analyses, checking for accuracy, detecting omissions, discovering public concerns, and soliciting counter proposals.” Guidelines § 15200. Guidelines Section 15144 requires an agency to “use its best efforts to find out and disclose all it reasonably can” in preparing the EIR. Metro failed to comply with these mandates regarding soliciting the involvement and opinions of all expert responsible and trustee agencies.

This is an occasion where the lead agency not only must go back to the DEIR drawing board in terms of fixing and recirculating the DEIR, but where the correct lead agency needs to go to the drawing board in the first instance.

Response P700-8 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Section 1.0, Introduction, of the Draft EIR, for discussion of the CEQA Responsible and Trustee Agencies. Refer to 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, for discussion of how Metro is the proper lead agency for the proposed Project because Metro has primary responsibility for implementation of the proposed Project as the region’s transportation authority, and Metro’s consultation with CEQA responsible agencies. Refer to Appendix A, Scoping Report, of the Draft EIR, and Appendix A, Public Outreach Report, of the Final EIR, for documentation of notice to responsible agencies at various stages in the environmental review process. Metro has complied, and will continue to comply, with the CEQA requirements for consultation with responsible agencies at each stage of the environmental review process. This consultation process has included meetings with Metro and the

responsible agencies to discuss the scope of environmental review, additional consultation with the City and State Parks as Draft EIR preparers, and comments from responsible agencies on the Draft EIR. This consultation process will continue throughout the course of the environmental review process. The Public Utilities Commission (“CPUC”) is not a responsible agency for the proposed Project as it does not have responsibility for carrying out or approving the proposed Project and does not have discretionary authority related to the proposed Project. Santa Monica Mountains Conservancy (“SMMC”) has no discretionary approval authority related to the proposed Project, however, Metro notified SMMC as a trustee agency.⁶ CEQA defines a “trustee agency” as “a state agency that has jurisdiction by law over natural resources affected by a project, that are held in trust for the people of the State of California.” (Public Resources Code, § 21070.) Refer to Topical Response E for a discussion of the Surplus Land Act. HCD is not a responsible agency for the proposed Project as it does not have responsibility for carrying out or approving the proposed Project and does not have discretionary authority related to the proposed Project. (Public Resources Code § 21069.) Section 2.10, Required Permits and Approvals, of the Draft EIR, provides a list of the potential discretionary entitlements, reviews, and approvals required for implementation of the proposed Project. As discussed in Appendix A, Public Outreach Report, of the Final EIR, consistent with the requirements of CEQA Guidelines section 15205(b)(2)-b(3), prior to the release of the Draft EIR, Metro submitted the required documentation of the release of the Draft EIR to the State Clearinghouse (SCH # 2020100007). Documentation of submittal of the Draft EIR to the State Clearinghouse is available on the SB 44 website.⁷ As indicated on the Notice of Completion form submitted to the State Clearinghouse, the State Clearinghouse was responsible for distribution the Draft EIR to reviewing agencies. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-9 C. The DEIR Is Further Defective Due To An Inadequate Notice of Preparation.

CEQA Guidelines Section 15082(a)(1) requires in part that:

- (1) The notice of preparation shall provide the responsible and trustee agencies, the Office of Planning and Research, and county clerk with **sufficient information** describing the project and the potential environmental effects **to enable the responsible agencies to make a meaningful response**. At a minimum, the information shall include:
 - (A) Description of the project

⁶ Los Angeles County Metropolitan Transportation Authority (LA Metro). 2023. Los Angeles Aerial Rapid Transit Project Email from Cory Zelmer to info@smmc.ca.gov.

⁷ Refer to Remainder of the Record Category at <https://laartsb44.net/#!/documents>

The description of the Project in the NOP was similarly inadequate, as it failed to inform responsible agencies of the range of discretionary approvals over which they would be required to act. For example, it failed to inform the City of Los Angeles that it would be required to approve a new Specific Plan. The NOP thus failed to trigger comments by the City of Los Angeles regarding the requisite contents of the EIR, and whether Metro is the appropriate lead agency for Project environmental review. The NOP for the Project was therefore inadequate and ineffective.

Response P700-9 The proposed Project's NOP complied with CEQA. CEQA Guidelines section 15082(a)(1) only requires an NOP to include a description of the project, location of the project (either by street address or attaching a map), and the probable environmental effects. The NOP fully complied with Section 15082(1)(a), and provided an adequate project description, the project location (including a map of the routes as well as a narrative description), and probable environmental effects. CEQA does not require an analysis of the probable environmental effects for the proposed Project in the Notice of Preparation, as that is the role of a Draft EIR. The NOP appropriately identified the environmental areas that would be studied in further detail in the Draft EIR. Further, sufficient information was provided in the NOP to guide the responsible agency consultation process, as the NOP provided a written project description detailing the components of the proposed aerial gondola system, the proposed route, project location and environmental setting, as well as the overall project purpose. Refer to 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, for discussion of the proposed Project's consultation with CEQA responsible agencies following the release of the NOP. Refer to Appendix A, Scoping Report, of the Draft EIR, and Appendix A, Public Outreach Report, of the Final EIR, for documentation of notice to responsible agencies at various stages in the environmental review process. Section 2.10, Required Permits and Approvals, of the Draft EIR was developed, including the proposed Specific Plan in the list of discretionary entitlements, reviews, and approvals required for implementation of the proposed Project, in consultation with the City and other responsible agencies.

Comment P700-10 D. The DEIR Is Further Defective Due To A Defective Notice of Availability.

Pursuant to Guidelines Section 15097(c)(6), the Notice of Availability (NOA) for an EIR is required to disclose:

(6) The presence of the site on any of the lists of sites enumerated under Section 65962.5 of the Government Code including, but not limited to, lists of hazardous waste facilities, land designated as hazardous waste property, hazardous waste disposal sites and others, and the information in the Hazardous Waste and Substances Statement required under subdivision (f) of that Section.

The NOA for the proposed Project fails to indicate whether any of the sites associated with the proposed Project are listed in any of the Section 65962.5 databases, despite the fact that the Phase 1 Assessment for the Project, included in DEIR Appendix K, states on pages ES-3 to ES-5 that:

The environmental database report search identified five properties in the proposed Project: LAUS and El Pueblo, which are the proposed locations for vertical circulation elements for the Alameda Station; 901 North Main Street, which is the proposed location of the Alpine Tower; the Los Angeles State Historic Park property, which is the proposed location of the Chinatown/State Park Station; and the 1201 North Broadway property, which is the proposed location of the Broadway Junction.

LAUS (proposed location for construction support space and vertical circulation elements for the Alameda Station) was identified in multiple compliance-related databases, as well as the Cleanup Program Sites- Spills, Leaks, Investigations, and Cleanups (CPS-SLIC) database....

El Pueblo (proposed location for construction support space and vertical circulation elements for the proposed Alameda Station), on the western side of Alameda Street, was identified in the US Brownfields database, which indicates that a Phase I ESA was completed in 2018 to 2019....

The 901 North Main Street property (proposed location of the Alpine Tower) was identified in several compliance-related databases, as well as the United States (U.S.) Brownfields database, which is maintained by the U.S. Environmental Protection Agency (USEPA)....

The EnviroStor database, which is an online data management system maintained by the California Department of Toxic Substances Control (DTSC), reports that Los Angeles State Historic Park (proposed location for the Chinatown/State Park Station) entered into a Voluntary Cleanup Program (VCP) with the DTSC in 2001, and remedial action (soil removal) was completed in 2003. However, according to a Supplemental Remedial Action Workplan Memorandum prepared by Group Delta Consultants, Inc. in 2015, during construction of Los Angeles State Historic Park in 2014, arsenic and lead contamination was encountered in near surface soils above the established site-specific clean-up goals. Based on available information on the online EnviroStor database, a complete soil removal action report has yet to be completed for the entire Los Angeles State Historic Park property; however, it appears from the Workplan Memorandum noted above that the soil removal action has been completed in selected portions of the park site....

Response P700-10 Under Public Resources Code section 21092(b)(1) and CEQA Guidelines section 15087(c),⁸ agencies shall publish a Notice of Availability (NOA) that a draft EIR is available for public review. The NOA is to provide certain information, including the period during which comments on the draft EIR will be received and the manner in which the lead agency will receive comments; the date, time, and place of any scheduled public hearings or meetings to be held by the lead agency regarding the proposed project; a brief description of the proposed project and its location; the anticipated significant environmental effects of the project; the presence on the property of a hazardous waste site that is on any list specified under Government Code section 65962.5; a description of how the EIR can be provided in an electronic format; and the location where the draft EIR and documents incorporated by reference in the draft EIR are available for inspection. Public Resources Code section 21092(b)(2) further provides that “[t]his section shall not be construed in any manner that results in the invalidation of an action because of the alleged inadequacy of the notice content if there has been substantial compliance with the notice content requirements of this section.” Thus, omission of certain information in an NOA is not a ground for invalidation of an action taken by the lead agency as long as the notice given substantially complies with the notice requirements. The NOA for the proposed Project substantially complied with the requirements of Public Resources Code section 21092 and CEQA Guidelines section 15087.

The NOA fully informed the public about the proposed Project. CEQA Guidelines section 15087(c)(6) requires that an NOA disclose the presence “of the site on any of the lists of sites enumerated under Section 65962.5 of the Government Code including, but not limited to lists of hazardous waste facilities, land designated as hazardous waste property, hazardous waste disposal sites and others, and the information in the Hazardous Waste and Substances Statement required under subdivision (f) of that Section.” The NOA included a URL link to the Draft EIR, which disclosed and analyzed potential impacts related to hazards and hazardous materials at the properties that coincide with the locations of the proposed Project’s stations, towers, and junction, and proposed mitigation, in Section 3.09, Hazards and Hazardous Materials, of the Draft EIR. As discussed therein, at page 3.9-29, the environmental database report (EDR) search conducted for the Phase I Environmental Site Assessment, included as Appendix K to the Draft EIR, identified five properties that coincide with the locations of the proposed Project’s stations, towers, and junction. The presence of these properties on certain databases identified in an EDR search does not necessarily mean that they are on lists specified under Government Code section 65962.5.

None of the five properties are identified as being on (1) a list of hazardous waste and substances sites from the DTSC EnviroStor database, (2) a list of solid waste disposal

⁸ The comment incorrectly refers to CEQA Guidelines Section 15097(c)(6). Section 15097 of the CEQA Guidelines relates to mitigation monitoring and reporting and does not contain any requirements for NOAs. The text cited in the comment is found in CEQA Guidelines 15087(c)(6).

sites identified by the SWRCB with waste constituents above hazardous waste levels outside the waste management unit, (3) a list of “active” Cease and Desist Orders and Cleanup and Abatement Orders from the SWRCB, or (4) a list of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code identified by DTSC.

As disclosed and analyzed in Appendix K, Phase I Environmental Site Assessment, of the Draft EIR, at page 6-17, the 1201 Broadway property was listed on the SWRCB’s online Geotracker database as a “complete-closed LUST case . . .” As explained in Section 3.09, Hazards and Hazardous Materials, of the Draft EIR, at page 3.9-17, the LUST case associated with the property has been closed for over two decades and received a closure letter from the Los Angeles Fire Department in 2001. It is not included in any of the various “OPEN” status categories on the list of Leaking Underground Storage Tank Sites from the SWRCB Geotracker database.

Given this disclosure and analysis in the Draft EIR, and the fact that the list of Leaking Underground Storage Tank Sites from the SWRCB Geotracker database identifies the status of 1201 N. Broadway as “COMPLETED – CASE CLOSED,” there is no prejudice. Section 3.09, Hazards and Hazardous Materials, and Appendix K, of the Draft EIR, disclosed the various database lists that the properties that coincide with the proposed Project’s stations, towers, and junction were identified by the EDR to be included on, including lists compiled pursuant to Government Code section 65962.5 (along with other available databases). The Draft EIR evaluated any potential impacts associated with potential hazards and hazardous materials at these properties and proposed mitigation for the same.

Further, as identified on the State Clearinghouse Notice of Completion & Environmental Document Transmittal Form (SCH # 2020100007), the NOA of the Draft EIR was sent to DTSC and the Regional Water Quality Control Board # 4. Also, as discussed in Appendix A, Public Outreach Report, of the Final EIR, information related to potential hazardous material impacts at certain properties that coincide with the locations of the proposed Project’s stations, towers, and junction, were presented to the public on slides 53 and 54 of the presentation of the key analyses and conclusions of the Draft EIR during the virtual informational workshop held on October 22, 2022, and the virtual public hearing held on December 13, 2022. This presentation was also printed and available to attendees of the three in-person public meetings held on October 25, 2022 (informational workshop), December 10, 2022 (public hearing), and January 12, 2023 (public hearing). During these in-person public meetings, a large, printed board summarizing the proposed Project’s impacts analyzed in the Draft EIR identified that impacts from potential hazardous materials during construction of the

proposed Project would be less than significant with implementation of mitigation. These slides and boards are available on the proposed Project's SB 44 website.^{9 10}

This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-11 Additionally, the Los Angeles State Historic Park property (proposed location for the Chinatown/State Park Station) is listed with an open-verification monitoring status in the CPS-SLIC database as of 2010. Based on review of documentation available on the online GeoTracker database, which is a data management system maintained by the State Water Resources Control Board (SWRCB), an annual groundwater monitoring program was first implemented in August 2000 at the request of the Los Angeles RWQCB....

Response P700-11 Refer to Response P700-10 for discussion of the substantial compliance of the NOA for the Draft EIR.

Comment P700-12 The 1201 North Broadway property (proposed location of the Broadway Junction) is listed with a completed-closed leaking UST (LUST) case as of 2001 in the environmental database report and the online GeoTracker database maintained by the SWRCB....

The NOA for the Project thus fails to comply with CEQA. The DEIR must be re-noticed and recirculated for public review and comment.

Response P700-12 Refer to Response P700-10 for discussion of the 1201 North Broadway property and the substantial compliance of the NOA for the Draft EIR. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-13 **E. The DEIR Is Further Defective By Failing to Obtain Responsible Agencies' Acceptance of Delegation of Mitigation Responsibility.**

There are a number of mitigation measures specified in the DEIR which are not within the Lead Agency's control, including MM-LUP-A, MM-TRA-A, MM-TRA-B, MM-TRA-C, and MM-USS-A, as detailed more fully later in this comment letter. Guidelines Section 15097 permits delegation of mitigation monitoring responsibility, provided that the public agency that would be responsible accepts delegation, stating:

15097. MITIGATION MONITORING OR REPORTING.

- (a) This section applies when a public agency has made the findings required under paragraph (1) of subdivision (a) of Section 15091 relative to an EIR or adopted a mitigated negative declaration in conjunction with approving a project. In order to ensure that the mitigation measures and project revisions

⁹ Los Angeles Aerial Rapid Transit. 2022. LA ART Informational Workshop Slides – 10/22 (available in English, Spanish, Chinese-Simplified, Chinese-Traditional).

¹⁰ Los Angeles Aerial Rapid Transit. 2022. Draft EIR Informational Workshop Boards (All Languages).

identified in the EIR or negative declaration are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity which accepts the delegation; however, until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program. (Emphasis added).

There has been no demonstration or documentation provided that the responsible agencies in question both concur with these mitigation measures and that they have accepted the delegation. Logically, documentation of acceptance of delegation necessarily needs to be provided as part of the DEIR, otherwise there is a lack of substantial evidence that the mitigations in question are feasible, and commenters cannot rely on the Lead Agency's representation that the mitigation measures would reduce impacts to a level considered less than significant. Since no such documentation is provided as part of the DEIR, the Lead Agency has therefore failed to proceed in the manner required by law.

In the absence of substantial evidence of responsible agency agreement and concurrence with the delegated mitigation measures, the potential for impacts in the areas of land use and planning (LUP), transportation (TRA), utilities and service systems (USS) and any other issue areas that depend on the delegation of mitigation development, implementation or monitoring to a public agency other than the Lead Agency, remain. Including pursuant to Guidelines Section 15088.5(a)(1) and (4), the DEIR must be corrected and recirculated for public review and comment.

Response P700-13 Refer to Section 7.0, Mitigation Monitoring and Reporting Program, of this Final EIR for an overview of mitigation monitoring requirements and for the proposed Project's Mitigation Monitoring and Reporting Program. The proposed Project's Mitigation Monitoring and Reporting Program satisfies the requirements outlined under CEQA Guidelines section 15097. Moreover, as demonstrated in Section 7.0, Mitigation Monitoring and Reporting Program, and Table 7-1, Mitigation Monitoring and Reporting Program (MMRP), of the Final EIR, the MMRP prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure. CEQA does not require that a lead agency be responsible for enforcing all mitigation measures. Therefore, it follows that the EIR need not provide evidence of whether an agency has "accepted" the delegation. A lead agency may presume that a responsible agency will act in accordance with its duties, and even then, retains the authority to ensure implementation of mitigation measures is occurring. Further, Metro consulted

with the City and State Parks pursuant to their roles as responsible agencies during the preparation of the MMRP. Accordingly, no corrections to the Draft EIR are warranted and this comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-14 II. SUBSTANTIVE DEFECTS IN THE DEIR REQUIRE ITS INVALIDATION AND RECIRCULATION, INCLUDING THE DEIR'S LACK OF AN ACCURATE, STABLE AND FINITE PROJECT DESCRIPTION.

As first noted by the Courts in County of Inyo v. Los Angeles (1977) 71 Cal.App.3d 185, 199, and reiterated in many subsequent cases, “(a)n accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR.” As explained by the Court of Appeal in StopTheMillenniumHollywood.com v. City of Los Angeles (2019) 39 Cal.App.5th 1:

County of Inyo was the first decision to articulate the need for a definite and unambiguous project description as part of CEQA’s environmental review process...

The County of Inyo court... concluded that the “incessant shifts’ among different project descriptions “vitiating[d] the City’s EIR process as a vehicle for “intelligent public participation,” because “[a] curtailed, enigmatic or unstable project description draws a red herring across the path of public input.”....

“The requirement of an accurate, stable, and finite project description as the *sine qua non* of an informative and legally sufficient EIR has been reiterated in a number of cases since County of Inyo. (See, e.g., Treasure Island, *supra*, 227 Cal.App.4th at p. 1052, 174 Cal.Rptr.3d 363 [“This court is among the many which have recognized that a project description that gives conflicting signals to decision makers and the public about the nature and scope of the project is fundamentally inadequate and misleading”]; Communities for a Better Environment v. City of Richmond (2010) 184 Cal.App.4th 70, 85–89, 108 Cal.Rptr.3d 478 [EIR failed as an informal document because the project description was inconsistent and obscure as to the true purpose and scope of the project]; San Joaquin Raptor Rescue Center v. County of Merced (2007) 149 Cal.App.4th 645, 653, 57 Cal.Rptr.3d 663 [an EIR must include detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project].)”

““Only through an accurate view of the project may affected outsiders and public decision makers balance the proposal’s benefit against its environmental costs, consider mitigation measures, assess the advantage of terminating the proposal.... and weigh other alternatives in the balance.” [Citation.]” *Id.* at 16-19.

A. The NOP Failed to Provide a Stable Project Description.

The NOP for the Project failed to provide an accurate and stable project description, indicating that:

The proposed route would travel generally along Alameda Street, Spring Street, and Bishops Road from LAUS to Dodger Stadium. The **proposed Project includes options** for an intermediate station to provide additional transit service adjacent to the Los Angeles State Historic Park and the location where the proposed Project flies over portions of the Park (the Spring Street Alternative and Broadway Alternative). . . . Figure 1 shows the regional location of the proposed Project and Figures 2 and 3 provide an overview of the Spring Street Alternative and Broadway Alternative, respectively. (Emphasis added).

Response P700-14 Refer to Response P700-9 for discussion of how the NOP for the proposed Project complied with CEQA. Refer to Responses P700-15 through P700-18 for discussion of how the Project Description for the proposed Project in the Draft EIR complied with CEQA. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-15 B. The DEIR Fails to Provide a Stable Project Description.

The lack of an accurate, stable and finite project description is then carried forward into the DEIR. DEIR page ES-10 indicates that:

The Project Sponsor will request consideration by the Los Angeles Dodgers **of the potential** for the Dodger Stadium Station **to 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 such consideration as to the mobility hub include maintaining security for Dodger Stadium and the surrounding surface parking areas. (Emphasis added).

How has the potential for the Project to include this mobility hub been addressed in the DEIR? An EIR is required to contain an accurate, stable and finite project description. This shows that there is fluidity in the project description and that the project description is not fully accurate or stable.

Response P700-15 Pursuant to Section 15124 of the CEQA Guidelines, the Draft EIR contained an accurate, stable, and consistent description of the proposed Project, with sufficient specific information about the proposed Project to allow a complete and informative evaluation and review of its environmental impacts. Section 2.0, Project Description, of the Draft EIR, included a description of all integral components of the proposed Project for the environmental analysis, enabling Section 3.0, Environmental Setting, Impacts, and Mitigation, of the Draft EIR, to fully analyze and disclose all impacts of

the proposed Project, and Section 4.0, Alternatives, of the Draft EIR, to consider potential alternatives to the proposed Project. Section 2.0, Project Description, of the Draft EIR contains the specific descriptions of the proposed Project required pursuant to CEQA Guidelines Section 15124, including a description of the proposed Project's location (Draft EIR, § 2.3), a statement of the project objectives (*id.*, § 2.3.8), a description of the project's technical and environmental characteristics (*id.*, §§ 2.2, 2.4 to 2.9), a discussion of the intended uses of the EIR (*id.*, § 1.2), and a list of the project approvals that will be required (*id.*, § 2.10). The Draft EIR complied with the requirements of CEQA to provide an accurate, stable, and finite Project Description. As discussed in Section 5.0, Corrections and Additions, of this Final EIR, 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/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 mobility hub at Dodger Stadium Station was included in Section 2.0, Project Description, of the Draft EIR and therefore assumed in the Draft EIR's analysis. For example, in Section 3.17, Transportation, of the Draft EIR, the mobility hub at Dodger Stadium Station was considered in the formulation of ridership estimates for neighborhood riders.

Comment P700-16 This fluidity is further exhibited in both the Executive Summary and DEIR Chapter 6, which describe five Design and Use Options for the Project. As explained on DEIR page 6-1:

While not proposed as part of the proposed Project, design and use options to the proposed Project have been considered in this Draft EIR to explore potential options to various Project components. Each design and use option offers a variation to the proposed Project.

Pursuant to Section 15126.6(a) of the CEQA Guidelines, an EIR shall describe a range of reasonable alternatives. This Draft EIR provides that analysis in Chapter 4.0. This Chapter 6.0 considers minor variations to the proposed Project, which qualify as design and use options instead of project alternatives.

For the proposed Project, five design and use options are considered for analysis in this chapter:

- Design Option A: Broadway Junction Shift to Avoid 451 E. Savoy
- Design Option B: Single Tower along Alameda Street
- Design Option C: Chinatown/State Park Station with Increased Height
- Use Option D: Chinatown/State Park Station as a Non-passenger Junction
- Design and Use Option E: Pedestrian Bridge at the Los Angeles State Historic Park

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.

It therefore is obvious that the DEIR includes a menu of possible Project components, rather than an accurate and stable project description, and that the project description thus fails to include the Project's precise location and boundaries. This is a fatal flaw of the DEIR. As noted by the Court in Save our Capitol v. Department of General Services (Dec. 6, 2022) 85 Cal.App.5th 1101 (Save our Capitol):

The description **must include the project's precise location and boundaries**; a statement of the project's objectives and underlying purpose; a general description of the project's technical, economic, and environmental characteristics; and a statement describing the EIR's intended use. (Guidelines, § 15124, subds. (a)-(d).) Whether the EIR contains an accurate and stable project description is a question of law subject to de novo review. (South of Market Community Action Network v. City and County of San Francisco (2019) 33 Cal.App.5th 321, 332, 245 Cal.Rptr.3d 174 (South of Market); accord Tiburon Open Space Committee v. County of Marin (2022) 78 Cal.App.5th 700, 738, 294 Cal.Rptr.3d 56.)

An accurate and complete project description is necessary for an intelligent evaluation of a project's potential environmental impacts. (Center for Sierra Nevada Conservation v. County of El Dorado (2012) 202 Cal.App.4th 1156, 1171, 136 Cal.Rptr.3d 351; San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus (1994) 27 Cal.App.4th 713, 730, 32 Cal.Rptr.2d 704.) It must contain sufficient information to understand the project's environmental impacts. (Dry Creek Citizens Coalition v. County of Tulare (1999) 70 Cal.App.4th 20, 28, 82 Cal.Rptr.2d 398.) "Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal ... and weigh other alternatives in the balance." (County of Inyo, supra, 71 Cal.App.3d at pp. 192-193, 139 Cal.Rptr. 396.) . . .

For us, the governing principal is whether the project description may have thwarted the public's ability to participate in the process and comment meaningfully on the EIR. Inadequate or unstable descriptions of the project may mislead the public and thwart the EIR process. (San Joaquin Raptor Rescue Center v. County of Merced (2007) 149 Cal.App.4th 645, 656, 57 Cal.Rptr.3d 663.) **"A project description that gives conflicting signals to decision makers and the public about the nature of the project is fundamentally inadequate and misleading."** (South of Market, supra, 33 Cal.App.5th at p. 332, 245 Cal.Rptr.3d 174.) "A curtailed, enigmatic or unstable project description draws a red herring across the path of public input." (County of Inyo, supra, 71 Cal.App.3d at p. 198, 139 Cal.Rptr. 396.) (Emphasis added.)

The inclusion of separate, segmented environmental review, of a menu of potential design component options, confuses and misleads the public regarding both the project description and the environmental impacts of the Project. In addition, the differing design options may result in different impacts to treasured historical resources, particularly when it comes to aesthetic impacts on these resources. (See discussion later in this letter documenting the Project’s significant aesthetic impacts on historic resources). Thus, the fluid project description, plus introduction of Design Options, renders the project description fatally flawed.

Response P700-16 This comment provides a general recitation and characterization of the Draft EIR and CEQA statute, case law, and regulations. Refer to Response P700-67 for discussion of the use of Design and Use Options in the Draft EIR and how they do not render the Project Description unstable.

Comment P700-17 C. The DEIR Is Further Defective Because the Project Description Omits Integral Components of the Project.

The project description included in the DEIR is also fatally flawed because it is incomplete and omits any detail regarding integral components of the Project. As noted on DEIR pages 2-61 to 2-62, the Project requires:

- An amendment to the Los Angeles State Historic Park General Plan
- A franchise agreement from the City of Los Angeles
- Creation and approval of a Specific Plan from the City of Los Angeles
- Modifications or relief from the City’s River Implementation Overlay District and Cornfield Arroyo Seco Specific Plan

The DEIR fails to provide specific information regarding the contents of the newly required Specific Plan, or the modifications to existing Plans and Overlay Districts. As a result, the Project Description is curtailed, incomplete and thus not accurate. As noted by the Court in *Save Our Capitol* at p. 130: “A project description that omits integral components of the project may result in an EIR that does not adequately disclose all the project’s impacts.”

The proposed General Plan amendment, franchise agreement, Specific Plan, and modifications or proposed relief documents should all be provided to the public concurrently with recirculation of a new DEIR.

Response P700-17 Refer to Topical Response F, Los Angeles State Historic Park Considerations for a discussion of the State Historic Park General Plan Amendment. Refer to 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, for discussion of how Metro engaged in consultation with responsible agencies (i.e., those tasked with the approval of the agreements and entitlements listed in the comment) early in the CEQA process and continues such consultation. Further, the discretionary and/or ministerial approvals presented in

Section 2.0, Project Description of the Draft EIR were determined to be necessary by the relevant responsible agencies. These were determined based on the description of the proposed Project as provided within the Project Description, which includes, but is not limited to, the location of the proposed Project, and the technical, economic, and environmental characteristics, consistent with the requirements of CEQA Guidelines section 15124, as discussed in Response P700-15. The Project Description provides a complete picture of the proposed developments and does not omit any integral components of the proposed Project. CEQA does not require inclusion of the documents requested in the comments, which will be provided to the public in connection with their consideration before the appropriate responsible agency following the potential certification of the EIR. Citation to the specific requirements and approvals is sufficient for the EIR to function as an informational document. Accordingly, this comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-18 In addition, the Project Description fails to specify the days and hours of Project operation. This along with the omission of anticipated fare information makes an independent confirmation of the accuracy of DEIR representations regarding ridership and VMT reductions impossible.

The Project Description in the DEIR is thus fatally flawed. Including pursuant to Guidelines Section 15088.5(a)(4), the DEIR must be corrected and recirculated for public review and comment.

Response P700-18 The Draft EIR addressed hours of operation in Section 2.0, Project Description. Page 2-42 in Section 2.0, Project Description, of the Draft EIR, states that it is anticipated that the proposed Project would typically provide daily service between 6:00am to 12:00am, subject to operational changes in response to ridership demand. Refer to Topical Response C, Project Features, for a discussion of how 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. Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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. As detailed in Appendix N, Ridership Model Development Memorandum, of the Draft EIR and Section 5.0, Corrections and Additions, of the Final 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 (including that the proposed Project would be free to ride for anyone with a ticket to a Dodgers game), parking costs, value of time, mode of access intercept surveys of Dodger Stadium Express riders, and many other data sources. Refer to Response P700-17 for a discussion of the Project Description's compliance with CEQA. The Project Description in the Draft EIR includes 62 pages of detailed descriptions of the whole of the action considered as part of the Project. In turn, the Draft EIR fully analyzes and discloses the potential environmental impacts of this proposed Project, providing mitigation as necessary for potentially significant impacts. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Comment P700-19 D. The DEIR Is Further Defective Because The Project Description Fails to Provide Evidence That the Project is Financially Feasible in the Long Term or Information on the Fare Structure.

Few public transit systems are fully funded by project fares. This is a private transit project. It is therefore important that the DEIR provide full disclosure regarding Project construction and operating costs, and the anticipated fare structure to demonstrate that the Project and the alternatives are feasible as proposed. This is important for a number of reasons that have implications for the environmental analysis.

For example, first, if the Project does not prove to be financially viable, and the system has to be abandoned or publicly subsidized, it could result in physical degradation of the area, or the diversion of financial resources that support the existing public transit system in order to maintain the Project, thus impacting existing public transit operations. The potential for such economic impacts to result in physical impacts on the environment needs be addressed in the DEIR, including pursuant to Guidelines Section 15131(b), particularly given that it does not appear that there is a financing plan in place which would provide for adequate operational revenues to support this private transit Project long-term.⁵

Second, the fare structure will have an impact on ridership and the mode choice of potential users. The DEIR claims that the Project will result in a reduction in VMT, but both ridership and resulting changes in VMT are highly dependent of the cost of the fare, particularly when it comes to a transit project such as this one, which will largely serve non-transit dependent discretionary riders making non-commute trips.⁶ Therefore, information regarding operating costs, responsibility, financing, and

anticipated fares is needed to support any claims regarding Project-related VMT reductions. In the absence of such information, any claims of VMT reduction, and consequent GHG reductions, are not supported by substantial evidence. This also means that any claims that the Project is consistent with the RTP are also not supported by substantial evidence.

Footnote 5: According to the Los Angeles Business Journal, September 5, 2022: <https://labusinessjournal.com/engineering/dodger-stadium-gondola-project-developer-hands-offproject-to-environmental-group-partner-retains-funding-role/>

Los Angeles Aerial Rapid Transit, the gondola tram development company headed by former Los Angeles Dodgers owner Frank McCourt, agreed on Aug. 9 to donate the gondola project to downtown-based Climate Resolve, an environmental nonprofit that focuses on collaborations to fight the impacts of climate change.

Under the deal, Los Angeles Aerial Rapid Transit will continue to fund the entitlement phase of the project, but Climate Resolve – through a newly created subsidiary called Zero Emissions Transit – will be responsible for shepherding the project through the entitlement process and then assembling the funding package and managing the construction phase.

According to the FAQ for the Project at <https://www.laart.la/faq/>

Similar to the Dodger Stadium Express, each baseball fan with a ticket to a Dodger game will be able to ride the gondola for free to the game..... Recognizing that they are not responsible for the project's financing, the Dodgers will join in providing information about this sustainable and clean energy transit opportunity, so it is well understood by Dodger fans..... Just like the Dodger Stadium Express, the aerial gondola will be free to ride for anyone attending a game at Dodger Stadium, which will maximize the air quality benefits from the project and encourage transit ridership.... Additionally, to increase local mobility options, the proposed "Community Access Plan" would allow local residents and employees of businesses close to the project to ride the gondola using their Metro fare at no additional cost.... For other riders, including tourists, a separate fare is being evaluated, to ensure that LA ART helps to attract visitors to learn more about the history of Los Angeles, starting at Union Station, and enjoy shopping and dining opportunities as well as cultural attractions at Olvera Street and Chinatown.

It therefore does not appear that there is a financing plan in place which would provide for adequate operational revenues to support the system long-term.

Footnote 6: As noted in Transit Price Elasticities and Cross-Elasticities, 16 September 2022, Todd Litman, Victoria Transportation Policy Institute, available at: <https://www.vtpi.org/tranelas.pdf> Transit Price Elasticities (i.e., the degree to which transit ridership is affected by changes in price) are a function of:

- **User Type.** Transit dependent riders are generally less price sensitive than choice or discretionary riders (people who have the option of using an automobile for that trip).
- **Trip Type.** Non-commute trips tend to be more price sensitive than commute trips. Elasticities for off-peak transit travel are typically 1.5-2 times higher than peak period elasticities, because peak-period travel largely consists of commute trips.
- **Type of Price Change.** Transit fares, service quality (service speed, frequency, coverage and comfort) and parking pricing tend to have the greatest impact on transit ridership. Elasticities appear to increase somewhat as fare levels increase (i.e., when the starting point of a fare increase is relatively high).
- **Direction of Price Change.** Transportation demand models often apply the same elasticity value to both price increases and reductions, but there is evidence that some changes are non-symmetric. Fare increases tend to cause a greater reduction in ridership than the same size fare reduction will increase ridership. A price increase or transit strike that induces households to purchase an automobile may be somewhat irreversible, since once people become accustomed to driving they often continue. See also: <https://digitalcommons.usf.edu/cgi/viewcontent.cgi?article=1339&context=jpt>

“Transit fares have a negative and significant effect on ridership in Los Angeles.” Per Rui Liu. “Improving Demand Modeling in California’s Rail Transit System” Mineta Transportation Institute Publications (2018). Available at: https://scholarworks.sjsu.edu/cgi/viewcontent.cgi?article=1238&context=mti_publications

Response P700-19 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, and Response P700-47 for discussion of the proposed Project’s ridership model which is based on extensive data sources and assumptions validated by data. As detailed in Appendix N, Ridership Model Development Memorandum, of the Draft EIR and Section 5.0, Corrections and Additions, of the Final 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 (including that the proposed Project would be free to ride for anyone with a ticket to a Dodgers game),

parking costs, value of time, mode of access intercept surveys of Dodger Stadium Express riders, and many other data sources. Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR.¹¹ Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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. 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. 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 typically provide daily service between 6:00am to 12:00am, subject to operational changes in response to ridership demand. 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. CEQA does not require speculation as to possible future environmental consequences, and the Draft EIR need not analyze uncertain, hypothetical future events. 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 P700-20 III. THE DEIR ALSO VIOLATES CEQA BECAUSE IT FAILS TO ANALYZE THE “WHOLE” OF THE PROJECT, AND ENGAGES IN, AND TURNS A BLIND EYE TO, ILLEGAL PIECEMEALING.

A significant portion of the block located east of Bishops Road, north of North Broadway, and south and west of Savoy Street has been acquired at far above market rates between approximately 2019 and 2022. (**Exhibit** attached hereto [parcel maps, data].) This heretofore undisclosed assemblage of parcels in the direct path of and within the Project area appears to be a piecemealed portion of the whole of the larger Project, which the DEIR fails to disclose to the public and decision makers. One must ask why, it appears, McCourt- or LA AART-affiliated entities spent tens of millions of dollars in 2019, and continuing in 2022, at that block. A major parking garage or high-

¹¹ Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.

density development seem to be likely candidates for that assemblage. (See <https://planning.lacity.org/pdiscaseinfo/search/encoded/MjEwNjk00> and <https://la.curbed.com/2017/8/10/16126038/johnson-fain-chinatownheadquarters-for-sale>). The true plan for Bishops/Broadway has not been revealed, but must be as part of a recirculated DEIR.

This large McCourt-directed development clearly appear linked to the Gondola Project but has not been disclosed, analyzed and mitigated in the current DEIR. As a result, the DEIR violates CEQA's prohibition against piecemealing. It does not account for the whole of the Project, including its significant cumulative and growth inducing impacts.

Response P700-20 The exhibit was considered in connection to this response. Refer to 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 for a discussion of how the proposed Project solely proposes an aerial gondola system.. As discussed in Section 2.0, Project Description, of the Draft EIR, 1201 North Broadway is location of the proposed Project's Broadway Junction, a non-passenger junction. Refer to Section 5.0, Other CEQA Considerations, of the Draft EIR, for an analysis of the proposed Project's cumulative and potential growth inducing impacts. Pursuant to Section 15130(b)(1)(A) of the CEQA Guidelines, a list of past, present, and probable future projects producing related or cumulative impacts was used as the basis for the Draft EIR's cumulative impacts analysis. As shown on Table 5-1, Related Projects, a mixed-use redevelopment project at 1201 North Broadway, i.e., the location cited in the comments as a potential development site, was analyzed as a related project for the Draft EIR's cumulative impacts analysis. The 1201 North Broadway project included as a related project had been entitled when the property was purchased. That entitled project was included and analyzed as a related project in the Draft EIR. All approved and proposed related projects relevant to the cumulative analysis for the proposed Project were included in Table 5-1. The proposed Project does not include other development beyond what is analyzed in the Draft EIR; neither the Project Sponsor nor anyone else has applied for other development unrelated to the proposed aerial gondola project on the North Broadway/Savoy Street block, and the proposed Project was not improperly segmented or "piecemealed" from a larger development project .

Comment P700-21 IV. ADDITIONAL CONCERNS ARE RAISED BY THE DEIR'S EXECUTIVE SUMMARY.

What is the nature of the relationship between the Project Sponsor and the owners and operators of Dodger Stadium? Is this Project, in fact, being proposed by the owners and/or operators of Dodger Stadium, or some subset thereof?

Response P700-21 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 P700-22 The DEIR indicates that the gondola system will require a total of approximately 2.5 megawatts of power (see for example DEIR page ES-12). What is the unit of time for this power use, per minute, per hour, per day, per week?

The DEIR describes the Project as a “high-capacity” zero emission ART. In what way is this a zero emission Project? The Project will require electrical consumption. Electrical generation results in emissions. In what way is this Project high-capacity? The description does not appear to be accurate.

Response P700-22 As discussed in Section 3.06, Energy, and Section 5.1.3.2 of Appendix H, Energy Technical Report, of the Draft EIR, when operating near capacity, normal operations are estimated to require approximately 2.5 MW of power which may occur during peak and non-peak periods. As discussed in Section 3.06, once fully operational (2026), the proposed Project would result in electricity demand of approximately 6.9 GWh/year. Further, the electrical power for the proposed Project’s 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. The proposed Project’s use of electricity supplied from LADWP’s Green Power Program is a voluntary commitment 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. The addition of GHG-PDF-A has been incorporated into Section 5.0, Corrections and Additions, in this Final EIR. Accordingly, the primary electricity usage associated with the proposed Project would come from renewable resources. As discussed in Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, of the Final EIR, 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. During peak operations, the proposed Project would carry up to approximately 5,000 people per hour per direction.

Comment P700-23 According to Table ES-1, the Project will require the export of a total of 62,623 cubic yards of soil. Table ES-1 should include a line summing the figures provided in the table. The DEIR needs to identify the disposal site for the exported soil and address any indirect impacts associated with the soil export.

Response P700-23 Refer to Section 2.0, Project Description, and Appendix B, Construction Assumptions, in the Draft EIR for the amounts of materials to be exported for proposed Project construction. An EIR need not identify the exact location of the haul route because those details are frequently determined during construction based on actual excavated soil conditions, which cannot be known at the time of the EIR preparation.

Nevertheless, refer to Response GO17-189 for a discussion of certain identified landfills and how the Draft EIR analyzed air quality impacts, including those related to emissions from haul truck trips during construction in accordance with applicable SCAQMD guidance. Refer to Section 3.03, Air Quality, and Appendix D, Air Quality/Health Risk Assessment Technical Report, of the Draft EIR, for discussion of how the emissions from haul truck trips would result in a less than significant impact.

Comment P700-24 V. THE DEIR ALSO VIOLATES CEQA THROUGH IMPROPER USE OF PROJECT DESIGN FEATURES (PDFS) AND BEST MANAGEMENT PRACTICES (BMPs).

DEIR page ES-21 states:

Project Design Features (PDFs), while not necessary for the impact significance determination, are included in Table ES-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.

However, some of the PDF's are clearly mitigation measures and the DEIR fails to innumerate the BMPs assumed in the impact analysis, identify what agency has identified them as BMPs, and to demonstrate that they are really features of the Project, rather than mitigation.

In terms of the PDFs, CUL-PDF-A, CUL-PDF-B, CUL-PDF-C, CULPDF-D and CUL-PDF-E, for example, are clearly designed to address potential impacts to the El Grito mural and historic Winery and do not describe physical components of the Project. The fact that these PDFs are mitigation measures is evidenced by statements in DEIR Appendix G, including the following:

Los Angeles Plaza Historic District and The Winery⁷

The Winery is listed as a contributor to the National Register Los Angeles Plaza Historic District and Los Angeles HCM. The Project may cause direct impacts to The Winery, and thus the Los Angeles Plaza Historic District. Detailed mitigation measures to minimize vibratory impacts to The Winery caused by construction activities to less than significant, including the use of vibration monitoring equipment (VIB-A) and force adjustable ground compaction devices (VIB-B), are provided in LA ART Noise and Vibration Technical Report. In addition to VIB-A and VIB-B, **GPA recommends the implementation of the following PDFs to ensure unforeseen impacts can be minimized to a less than significant level...**

El Grito (The Cry) Mural⁸

The Project may cause direct impacts to El Grito mural within Placita de Dolores. The mural is eligible for listing in the National Register, California Register, and as a Los Angeles HCM. Detailed mitigation measures to minimize vibratory impacts to El Grito caused by construction activities to less than significant, including the use of vibration monitoring equipment (VIB-A) and force adjustable ground

compaction devices (VIB-B), are provided in LA ART Noise and Vibration Technical Report. In addition to VIB-A and VIB-B, GPA **recommends implementation of the following PDFs to ensure unforeseen impacts can be minimized to a less than significant level.** (Emphasis added)

CUL-PDF-A and CUL-PDF-C require pre-construction documentation of the condition of these two resources. CUL-PDF-B then is designed to address any identified impacts and reads as follows:

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).

CUL-PDF-D and E similarly reads as follows:

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 El Grito mural is sufficiently protected from any inadvertent damage caused by construction activities. Following National Park Service guidance for 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 El Grito mural.
2. The El Grito 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 El Grito mural and curved wall to diffuse the force of any potential physical contact. The barrier should include removable panels or similar features 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 El Grito mural.

All of the protective measures described above should be installed and secured in such a way that does not damage the El Grito mural or the wall on which it is located. The barrier will not be physically attached to the El Grito mural or wall with screws, nails, or other fasteners.

CUL-PDF-E Construction Monitoring Plan (Built Resources).⁹

Prior to the issuance of building permits for the Alameda Station, the Project Sponsor will prepare a Construction Monitoring Plan in coordination with the Los Angeles Department of Cultural Affairs (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 El Grito 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 El Grito 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 El Grito mural.
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 El Grito mural equivalent to CUL-PDF-C will be taken to objectively compare the condition of the El Grito 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 El Grito 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.

These are clearly measures intended to reduce impacts. The DEIR includes aesthetic, air quality, biological resource, cultural resource, noise, and wildfire PDFs. While several of the PDF are standard regulatory measures, or include components that are regulatory measures, or are actually physical design features of the Project, the PDFs are, for the most part, clearly measures intended to mitigate, minimize or avoid

impacts. The way the DEIR has relied on PDFs in making impact judgements is contrary to the requirement that project impact significance determinations under CEQA be made without consideration of mitigation measures.

The EIR for the proposed project thus understates Project impacts by improperly relying on PDFs, which are in fact mitigation measures, as a basis for concluding that Project impacts are less than significant. In *Lotus vs. Department of Transportation* (2014) 223 Cal.App.4th 645, the Court found that an EIR violated CEQA by incorporating proposed mitigation measures into the description of the project, and then basing its conclusion of less-than-significant impacts in part on those mitigation measures. This is exactly what has been done in the DEIR for the proposed Project. The Court found that this improperly compressed the analysis of impacts and mitigation measures into a single issue.

In *Lotus*, Caltrans was found to have certified an insufficient EIR based on its failure to properly evaluate the potential impacts of a highway project. The *Lotus* Court found that Caltrans erred by:

incorporating the proposed mitigation measures into its description of the project and then concluding that any potential impacts from the project will be less than significant. As the trial court held, the “avoidance, minimization and/or mitigation measures,” as they are characterized in the EIR, are not “part of the project.” They are mitigation measures designed to reduce or eliminate the damage to the redwoods anticipated from disturbing the structural root zone of the trees by excavation and placement of impermeable materials over the root zones. By compressing the analysis of impacts and mitigation measures into a single issue, the EIR disregards the requirements of CEQA. *Lotus* at pp. 655-656 (emph. added).

The Court ordered Caltrans’ certification of the EIR set aside, finding:

[T]his shortcutting of CEQA requirements subverts the purposes of CEQA by omitting material necessary to informed decision-making and informed public participation. It precludes both identification of potential environmental consequences arising from the project and also thoughtful analysis of the sufficiency of measures to mitigate those consequences. The deficiency cannot be considered harmless. *Id.* at 658.

The analyses of both the proposed Project and PDFs are fatally flawed because many of the PDFs are in fact mitigation measures. The EIR thus understates impacts in a way that is far more extreme than what happened in *Lotus*. Under CEQA, significance determinations must be made without consideration of avoidance, minimization, and/or mitigation measures. The DEIR for the Project has violated this precept and understated and failed to identify impacts. The EIR is therefore fatally flawed on this additional ground. This must be corrected and the EIR recirculated, including pursuant to CEQA Guidelines Section 15088.5(a)(1), (2) and (4).

Footnote 7: Appendix G, page 99-100.

Footnote 8: Appendix G, page 101.

Footnote 9: It should be noted that a similar construction monitoring plan for significant impacts to archaeological resources, MM-CUL-A, is classified as a mitigation measure in the DEIR.

Response P700-24 This comment provides a general recitation and characterization of the Draft EIR and the CEQA statute, case law, and regulations. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the proposed Project's use of project design features does not obscure project impacts. CUL-PDF-A, CUL-PDF-B, CUL-PDF-C, CUL-PDF-D and CUL-PDF-E are project design features, 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, pages 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, they are properly defined as project design features intended to provide additional environmental benefits rather than to mitigate a potential environmental impact. Certain project design features cross-reference mitigation measures included to reduce potential impacts from vibration, but this does not render the project design features as mitigation for potential significant cultural resources impacts as the commenter suggests. As discussed on pages 3.5-45 and 3.5-46 of the Draft EIR, Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project, of the Draft EIR, recommends the project design features be implemented where impacts would already be reduced to a less than significant level with the implementation of mitigation measures, and therefore the project design features would simply provide additional environmental protection. As discussed in Section 3.05, Cultural Resources, of the Draft EIR, potential impacts from the proposed Project were otherwise analyzed and disclosed prior to the implantation of project design features.

Comment P700-25 **VI. THE DEIR FURTHER VIOLATES CEQA BY ENGAGING IN DEFERRED OR DELEGATED MITIGATION, AND BY USE OF MITIGATION MEASURES THAT LACK CLEAR STANDARDS.**

Metro proposes to depend on other agencies to carry out the vast majority of the mitigation measures in the DEIR, and specifies few, if any, parameters within which these other agencies must operate. The mitigation measures for construction impacts are both improperly delegated and deferred, with the City of Los Angeles, which will presumably issue the actual construction approvals, bearing the greatest share of the load. This deferral of mitigation and shrugging off responsibility for it reflects Metro's general attitude, expressed in its original Request for Information to LA ART, that "Metro does not envision taking a hands-on, prescriptive, or performance minded

approach to this project.” (LA ART’s Response to Metro’s Request for Information, p. 8.) The DEIR reflects this hands-off approach to the Gondola Project.

Response P700-25 As demonstrated in Section 7.0, Mitigation Monitoring and Reporting Program, and Table 7-1, Mitigation Monitoring and Reporting Program (MMRP), of the Final EIR, the Mitigation Monitoring and Reporting Program prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure. CEQA does not require that a lead agency be responsible for enforcing all mitigation measures. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the use of plans in mitigation measures would not constitute impermissible deferral. Such actions are commonplace under CEQA where additional study is required but is not appropriate or otherwise feasible at the time of CEQA review. The reference to Metro’s unsolicited proposal process is noted, but the cited document predates the initiation of environmental review for the proposed Project and accordingly does not have any bearing on the sufficiency of the Draft EIR.

Comment P700-26 The DEIR identifies what it considers “significant” impacts only during the construction phase of the proposed Project, and only one impact that cannot be mitigated to less than significant. (DEIR, p. ES-58 [Noise and Vibration].) Other potentially significant construction impacts will supposedly be mitigated by a series of plans, yet to be developed. (See, e.g., Construction Traffic Management Plan [MM-TRA-B, at DEIR p. 3.17-67].)

The CEQA Guidelines are clear that an EIR may rely on mitigation that is deferred past project approval “provided that the agency (1) commits itself to the mitigation; (2) adopts specific performance standards the mitigation will achieve; and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard that will be considered, analyzed, and potentially incorporated in the mitigation measure.” Guidelines § 15126.4(a)(1)(B) (emphasis added). Section 15126.4(a)(2) requires that mitigation measures “be fully enforceable through permit conditions agreements, or other legally binding instruments.”

Many of the mitigation plans are plainly deferred, since they are described in a sketchy, abbreviated manner, in the DEIR and are not required to be adopted prior to the issuance of the relevant building permit (see, e.g., MM-TRA-B, Construction Traffic Management Plan [DEIR, p. 3.17-67], prior to the issuance of a grading permit (VIB-A: Vibration Monitoring [DEIR, p. 3.13-73]), or prior to the start of construction (MM-TRA-C, Temporary Disaster Route Plan [DEIR, p. 3.17-69].) None is required to be fully fleshed out before Project approval, or during the public review of the DEIR. Since these are deferred mitigation measures, Metro must be held to the limitations on deferred mitigation set out in the CEQA Guidelines.

Guidelines Section 15126.4(b) requires in part that:

Formulation of mitigation measures shall not be deferred until some future time. The specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will be considered, analyzed, and potentially incorporated in the mitigation measure. Compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards.

All of the mitigation measures need to clearly state when the mitigation is needed to address the significant environmental impact and should be legally enforceable. This is best accomplished by specifying that specific permits shall not be issued until mitigation compliance has been demonstrated. In addition, the mitigation measures should include standards for achieving the requisite level of mitigation and potential actions that can feasibly achieve the performance standards. This is particularly important when mitigation responsibility has been delegated to another public agency.

Response P700-26 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the mitigation measures for the proposed Project would not impermissibly defer mitigation, and appropriately include enforcement mechanisms and performance standards that the mitigation measures are designed to achieve. 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,” thus providing a specific performance standard for compliance. Mitigation Measure TRA-B also includes an enforcement mechanism through the requirement that the City of Los Angeles approve the plan prior to the issuance of a building permit for the proposed Project. Mitigation Measures VIB-A and TRA-C similarly comply with CEQA, requiring the preparation of their respective plans prior to the issuance of grading and building permits, respectively, for the proposed Project. Mitigation Measure VIB-A also includes specific performance standards, requiring that monitoring devices notify the construction crew if vibration levels are within 0.1 PPV, in/sec, of the vibration damage threshold such that the construction crew shall modify the equipment to ensure that this threshold is not exceeded. Mitigation Measure TRA-C likewise provides a specific performance standard, requiring that the plan include

information to facilitate the movement of emergency vehicles through the study area and minimize effects on emergency response during a disaster. Moreover, as demonstrated in Section 7.0, Mitigation Monitoring and Reporting Program, and Table 7-1, Mitigation Monitoring and Reporting Program (MMRP), of the Final EIR, the MMRP prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure. CEQA does not require that a lead agency be responsible for enforcing all mitigation measures. In addition, the MMRP clearly defines when mitigation is required for potentially significant impacts, delineating the mitigation required for each potential environmental impact. In addition, when mitigation is required, the mitigation measure is defined and discussed in the context of the particular environmental impact. (See e.g., Draft EIR, pages 3.4-17 to 3.4-18, and 3.4--21 in Section 3.04, Biological Resources; pages 3.5-45 to 3.5-46, and 3.5-57 to 3.5--63 in Section 3.05, Cultural Resources; pages 3.7-14 to 3.7-15, 3.7-17 to 3.7-18, and 3.7-20 in Section 3.07, Cultural Resources; pages 3.9-23 to 3.9-24, and 3.9-26 to 3.9-30 in Section 3.09, Hazards and Hazardous Materials; pages 3.11-38, and 3.11-42 to 3.11-43 in Section 3.11, Land Use and Planning; pages 3.13-72 to 3.13-76 in Section 3.13, Noise; pages 3.15-19, 3.15-23, and 3.15-25 to 3.15-26 in Section 3.15, Public Services; pages 3.17-39 to 3.17-44, 3.17-58, and 3.17-66 in Section 3.17, Transportation; pages 3.18-15 to 3.8-16, in Section 3.18, Tribal Cultural Resources; pages 3.19-20 to 3.19-21, and 3.19-25 in Section 3.19, Utilities and Service Systems).

Comment P700-27 A number of the mitigation measures in the DEIR do not comply with CEQA requirements that mitigation measures must be feasible and enforceable, that the EIR must identify any uncertainty in the effectiveness of the measures proposed, and that mitigation cannot be improperly deferred. As explained by the Court in Gardiner Farms v. County Kern (2020) 45 Cal.App.5th 814:

The mitigation measures discussed in the EIR should be feasible. (Guidelines, § 15126.4, subd. (a); see Guidelines, § 15364 [definition of feasible].) . . .

CEQA defines the term “[f]easible” as meaning “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.” (§ 21061.1; see § 21081, subd. (a)(3) [necessary findings relating to mitigation measures or alternatives].) The guidelines add “legal” factors to the list. (Guidelines, § 15364; see City of Marina v. Board of Trustees of California State University (2006) 39 Cal.4th 341, 356.) . . .

CEQA imposes several requirements on mitigation measures. Section 21081.6, subdivision (b) provides: “A public agency shall provide that measures to mitigate or avoid significant effects on the environment are fully enforceable through permit conditions, agreements, or other measures. Conditions of project

approval may be set forth in referenced documents which address required mitigation measures. . . .” Similarly, Guidelines section 15126.4, subdivision (a)(2) states: “Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments.” The responsibility of the public agency does not end with simply imposing enforceable mitigation measures. “The public agency shall adopt a reporting or monitoring program for the . . . conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.” (§ 21081.6, subd. (a)(1).) The purpose of a monitoring program is to ensure compliance with the mitigation measures imposed as conditions of the project approval.

The absence of specific performance criteria and a commitment by the County leads to the conclusion that the provisions in MM . . . are not “fully enforceable through permit conditions, agreements, or other legally binding instruments.” (Guidelines, § 15126.4, subd. (a)(2).) . . .

The requirement for a description of the mitigation is based on the general rule that “an EIR is required to provide the information needed to alert the public and the decision makers of the significant problems a project would create and to discuss currently feasible mitigation measures.” (Sierra Club v. County of Fresno, *supra*, 6 Cal.5th at p. 523.) The discussion provided must contain facts and analysis, rather than the agency’s bare conclusions or opinions. (*Id.* at p. 522.) Whether the facts and analysis included in the EIR’s discussion of currently feasible mitigation measures are sufficient to comply with CEQA depends on “whether the EIR includes enough detail ‘to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project.’ [Citations.] The inquiry presents a mixed question of law and fact. . .

Our conclusions that the EIR must identify and explain the uncertainty in the effectiveness of the mitigation measures proposed is a specific application of the general principles governing the discussion of mitigation measures. To fulfill its informational role, an “EIR must contain facts and analysis” (Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn. (1986) 42 Cal.3d 929, 935). Uncertainty in the extent a measure will be effective, as well as the reasons for that uncertainty, are important facts that should be disclosed to the public and decision makers.

“[A]n EIR is required to provide the information needed to alert the public and the decision makers of the significant problems a project would create and to discuss currently feasible mitigation measures.” (Sierra Club v. County of Fresno, *supra*, 6 Cal.5th at p. 523.) To fulfill the EIR’s informational role, the discussion of the mitigation measures must contain facts and analysis, not bare conclusions and opinions. (*Id.* at p. 522.) The level of detail CEQA requires in the EIR’s discussion of facts and analysis of the mitigation measures depends on “whether

the EIR includes enough detail ‘to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project.’ “ (*Sierra Club v. County of Fresno, supra*, at p. 516.) . . .

Even if particular technologies and techniques had been identified and described in the EIR, this statement leaves the reader wondering if an applicant would be required to commit to any measures in its application or, alternatively, whether the applicant could omit those measures from its application because they were beyond the County’s authority or control. . . .

This “noncompliance with the information disclosure” requirements of CEQA “preclude[d] relevant information from being presented to the public agency” and the public. (§ 21005, subd. (a).) It constitutes a prejudicial violation of CEQA by itself and supports the conclusion that the failure of the mitigation measures to comply with the general rules against deferred formulation was prejudicial.

Response P700-27 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. 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. Refer to Response P700-26 for a discussion of the mitigation measures for the proposed Project. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the mitigation measures for the proposed Project would not impermissibly defer mitigation.

Comment P700-28 A number of the mitigation measures in the EIR are legally deficient because, as written, they are not fully enforceable¹⁰ through permit conditions, agreements, or other measures. In addition, several of the mitigation measure are ineffective because they are only required if feasible, thereby vitiating their mitigation value. Other measures are ineffective because they lack standards and constitute improper deferral of mitigation.

Footnote 10: Mitigation is required by CEQA to be fully enforceable, and to be carried out. Guidelines § 15126.4(a)(2); *Lincoln Place Tenants Assn. v. City of Los Angeles* (2005) 130 Cal.App.4th 1491, 1508.

Response P700-28 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the mitigation measures for the proposed Project would not impermissibly defer mitigation. Further, recognition in the Draft EIR that certain aspects of mitigation measures may be infeasible does not violate CEQA or render mitigation measures ineffective, but simply recognizes that all regulatory requirements will be adhered to the extent necessary for the pertinent resources. Moreover, as demonstrated in Section 7.0, Mitigation Monitoring and Reporting Program, and Table 7-1, Mitigation Monitoring and Reporting Program (MMRP), of the Final EIR, the MMRP prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure

supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure.

Comment P700-29 The value of mitigation measures MM-CUL-A and MM-CUL-F are vitiated by language that conditions implementation on the feasibility of the mitigation measure. Mitigation Measure MM-CUL-A reads in relevant part:

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. (Emphasis added).

The DEIR acknowledges that impacts to archeological resources are significant prior to mitigation. Because the mitigation specified “following practices that seek to avoid and preserve state-owned historical resources,” (only) “when prudent and feasible,” impacts to State-owned archeological resources at the Chinatown/State Park Station and El Pueblo de Los Angeles remain significant and unmitigated.

Mitigation Measure MM-CUL-F is similarly defective and reads as follows:

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. (Emphasis added)

Mitigation Measure MM-CUL-F (in combination of MM-CUL-E) is thus both an example of deferred analysis and improper deferral of mitigation. In addition, the mitigation value of the measure is destroyed by the language “as feasible. Impacts to archeological features at Los Angeles State Historic Park therefore remain significant. The DEIR must be corrected to identify these impacts and recirculated pursuant to CEQA Guidelines Section 15088.5 (a)(1), if the feasibility language is retained.

Response P700-29 The Draft EIR fully analyzed and addressed the proposed Project’s potential impacts to cultural resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for

the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, Cultural Resources, of the Draft EIR, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation, such as archaeological testing. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the use of plans in mitigation measures would not constitute impermissible deferral. Such actions are commonplace under CEQA where additional study is required but is not appropriate or otherwise feasible at the time of CEQA review (for example, where ground disturbance and excavation is infeasible prior to project approval). As discussed in Topical Response I, recognition in the Draft EIR that certain aspects of mitigation measures may be infeasible following further study does not violate CEQA or render mitigation measures ineffective but simply recognizes that all regulatory requirements will be adhered to the extent necessary for the pertinent resources. 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).

Comment P700-30 The following mitigation measure is an example of improper deferral of mitigation because it lacks a clear standard:

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 to classify them as either hazardous or nonhazardous; and if identified as hazardous, shall include additional methods and procedures for the proper handling and removal of impacted soils and/or groundwater for offsite 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.

The mitigation measure lacks a clear standard because it fails to disclose the specific applicable federal, state and local regulations that define the standard. In addition, the mitigation measure is deficient because it is legally unenforceable. It merely

requires that “Project Sponsor shall retain a qualified environmental consultant to prepare a Soil and Groundwater Management Plan.” It does not require that the Plan be reviewed and approved by a responsible agency prior to issuance of any grading or construction permits.

Response P700-30 Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the proposed Project’s mitigation measures, including Mitigation Measure HAZ-A, are consistent with the requirements of CEQA. CEQA does not require plans and studies contemplated in mitigation measures to be developed during the Draft EIR process or prior to project approval, and recognizes that the development of plans or future studies may be appropriate in order 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. In addition, conditions requiring compliance with regulations are common and reasonable mitigation measures under CEQA. 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 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 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. Refer to Section 5.0, Corrections and Additions, of this Final EIR. Refer to Section 7.0, Mitigation Monitoring and Reporting Program, and Table 71, Mitigation Monitoring and Reporting Program (MMRP), of the Final EIR, discussing how the MMRP prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure.

Comment P700-31 Metro and the DEIR fail to comply with CEQA in other respects related to ostensible mitigation measures. The DEIR sets out a long list of partial and full lane closures for periods lasting up to 30 weeks at a time on Cesar Chavez Avenue, Alameda Street, Main Street, Los Angeles Street, and adjacent to the State Historic Park. A few examples of these closures are at the DEIR’s Hazards and Hazardous Materials Section at p. 3.9-32 (16 weeks, closures on Cesar Chavez and Alameda, under the

Alameda Station, Temporary Deck Option); p. 3.9-35 (16 weeks, require the full-time closure of the two southbound through lanes and the northbound curbside drop off lane during construction of foundations and columns under the No-Deck Option of the Alameda Station); p. 3.9-35 (30 weeks, closure of all lanes on Alameda Street between Cesar Chavez Avenue and Los Angeles Street for the Structural Steel and Gondola Equipment Erection of the Alameda Station); p. 3.9-37 (16 weeks, full time closure of one northbound lane on Alameda Street During Foundation and Columns phase of Alameda Tower construction); p. 3.9-39 (22 weeks, full closure of Alameda Street between Main Street and Alhambra Avenue, except one lane kept open for emergency and local access, for Structural Steel and Gondola Equipment Erection for Alameda Tower); p. 3.9-37 (22 weeks closure of two northbound lands on Alameda between Main and Alhambra for Structural Steel phase of Alameda Tower); p. 3.9-39 (15 weeks, full closure of one northbound land on Alameda Avenue, for Foundations and Columns phase of Alpine Tower); p. 3.17-57 (“full-time closure of all travel and parking lanes on North Broadway (the northbound left/center left turn lane, two northbound through lanes, the southbound through lane, the southbound through-right lane, and the northbound and southbound parallel parking lanes) between Cottage Home Street and Savoy Street, and all travel and parking lanes and shoulders on Bishops Road (the shared eastbound left/eastbound right turn lane, the westbound through lane, and the eastbound parallel parking lane and westbound parking shoulder) between North Broadway and Savoy Street during the approximately three-week deck removal phase.”) For brevity’s sake, this is only a partial list. Many more closures are identified in the DEIR.

The proposed Project would wreak havoc for weeks at a time on traffic, in multiple phases of the construction of Gondola stations and towers, causing lane closures in heavily-traveled portions of Los Angeles. The DEIR admits, for example, that the “temporary lane closures during construction would, by necessity, increase traffic volumes on the detour routes, which could increase traffic congestion on those routes.” (DEIR, p. 3.17-58.) It concludes that “implementation of a Construction Traffic Management Plan, as outlined in Mitigation Measure TRA-B, as presented in Section 3.17.5, 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.” (Id.) Similarly, the discussion in the DEIR subsection dealing with emergency response and evacuation plans finds all the lane closures to have less than significant impact only “with mitigation.” (DEIR, p. 3.9-31.)

However, Metro does not commit itself to designing, setting performance standards for, or carrying out the mitigation that the DEIR concludes must be carried out to reduce the impacts of the various closures to less than significant levels. Instead, Metro essentially delegates responsibility for approving and carrying out this mitigation to the City of Los Angeles. The DEIR recognizes that “[a]ll the streets in the Project study area are under the jurisdiction of the City of Los Angeles”

(DEIR, p. 3.16-31), and states that, as to mitigation for the impacts of Project construction on traffic and transportation, “the ultimate design, construction process, and traffic handling would be subject to design review and approval by the City of Los Angeles and other reviewing agencies, so the potential construction work areas, and traffic handling could vary from the scenarios identified for the purposes of analysis in this EIR. However, impacts are expected to be less than significant with mitigation incorporated.” (DEIR, p. 3.17-45.) That statement shows that Metro does not know whether what is described in the DEIR is what will actually be done on the ground. Metro cannot commit itself to what it admits it does not know. Nonetheless, the DEIR “expect[s]” impacts to be mitigated to less than significant, even if neither Metro nor the public now knows what the mitigation will be or how well it will (or will not) really work. This is a failure to provide substantial evidence that impacts will, in reality, be mitigated to less than significant levels.

Response P700-31 This comment provides a general recitation and characterization of the Draft EIR. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the proposed Project’s mitigation measures, including Mitigation Measure TRA-B, complied with CEQA. CEQA does not require plans and studies contemplated in mitigation measures to be developed during the Draft EIR process or prior to project approval, and recognizes that the development of plans or future studies may be appropriate in order 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. Moreover, as demonstrated in Section 7.0, Mitigation Monitoring and Reporting Program, and Table 7-1, Mitigation Monitoring and Reporting Program (MMRP), of the Final EIR, the MMRP prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure. In addition, the City of Los Angeles is a responsible agency under CEQA for the Draft EIR and was consulted during the preparation of the Draft EIR. Regarding LADOT specifically, a Transportation Assessment Memorandum of Understanding (“MOU”) was prepared and approved by LADOT in accordance with LADOT’s procedures and *Transportation Assessment Guidelines*. The MOU is included as Appendix A to the report entitled *Los Angeles Aerial Rapid Transit Project, Non CEQA Transportation Assessment* made available for public review in September 2022 on the proposed Project’s SB 44 website. In addition, LADOT issued a memorandum regarding the Transportation Assessment for the Proposed Los

Angeles Aerial Rapid Transit Project Located Between Union Station and Dodger Stadium on September 27, 2022.¹²

Comment P700-32 Nor does Metro prescribe full and specific performance standards. Mitigation Measure TRA-B: Construction Traffic Management Plan, prescribes a list of measures to lessen the impacts of lane closures, the presence of construction crews and materials, and so forth. However, it prescribes no performance standards for the effectiveness of these measures, except that land uses in proximity to Project construction must be accessible (the degree of accessibility is not specified), and emergency vehicles must be able to get through. (DEIR, p. 3.17-68-3.17-69.) There is no other standard provided for the success or effectiveness of these measures; how well they must work is not specified. The only performance standard provided is the yes/no test of whether or not they are carried out. Neither the decision maker (Metro) nor the public can know how successful any or all of the measures will be, nor is any provision made to determine how well they are or are not working. This violates the Guidelines' requirement for performance standards.

Despite this complete lack of standards (except for some access provisions), the DEIR confidently asserts that "transportation impacts would be reduced to a less than significant level." (DEIR, p. 3.17-69.) This is a conclusion that lacks substantial evidence; no standards have been articulated in the DEIR against which the Plans can be evaluated except the two access provisions. This violates Public Resources Code Section 21002 by allowing the approval of a project that has the potential to harm the human environment. In addition, CEQA's full public disclosure requirements are also put in jeopardy by this approach to mitigation. The Construction Traffic Management Plan and Temporary Disaster Route Plan do not need to be completed until "prior to the issuance of a building permit for the proposed Project" (id.), after the CEQA process is completed and without any guaranteed opportunity or process for public scrutiny of the finished plans. Finally, the DEIR does not discuss whether the various plans and measures will be made enforceable through permit conditions or other agreements. Metro has violated all provisions of CEQA Guidelines Section 15126.4(a)(2).

Response P700-32 Refer to Response P700-13 for a discussion of how the EIR need not provide evidence of whether an agency has "accepted" the delegation. A lead agency may presume that a responsible agency will act in accordance with its duties, and even then, retains the authority to ensure implementation of mitigation measures is occurring. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the proposed Project's mitigation measures comply with CEQA and would not impermissibly defer mitigation, as well as how the use of plans in mitigation measures does not constitute impermissible deferral. Such actions are commonplace under CEQA where additional study is required but is not appropriate

¹² Los Angeles Department of Transportation. 2022. Transportation Assessment for the Proposed Los Angeles Aerial Rapid Transit Project Located Between Union Station and Dodger Stadium.

or otherwise feasible at the time of CEQA review, for example, where ground disturbance and excavation is infeasible prior to project approval. CEQA does not require plans and studies contemplated in mitigation measures to be developed during the Draft EIR process or prior to project approval, and recognizes that the development of plans or future studies may be appropriate in order 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. Refer to Response P700-26 for a discussion of how Mitigation Measure TRA-B includes specific performance standards and does not impermissibly defer mitigation. Moreover, as demonstrated in Section 7.0, Mitigation Monitoring and Reporting Program, and Table 7-1, Mitigation Monitoring and Reporting Program (MMRP), of the Final EIR, the MMRP prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure. Further, Metro consulted with the City and State Parks pursuant to their roles as responsible agencies during the preparation of the MMRP. Refer to Response P700-6 for a discussion of how the City is a responsible agency under CEQA for the Draft EIR and was consulted during the preparation of the Draft EIR.

Comment P700-33 Further, as previously noted, CEQA Guidelines Section 15097(a) states that “A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity **which accepts the delegation**; however, until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.” (Emphasis added.)

The DEIR must include documentation demonstrating that specified responsible agencies have accepted delegation of mitigation monitoring and enforcement responsibility. In the absence of such a showing that responsible agencies have accepted the delegation, it cannot be concluded that impacts are less than significant. In addition, the absence of a mechanism for the Lead Agency to verify mitigation compliance, the measures are not legally enforceable. The following are examples of mitigation measures which have not be properly delegated to responsible agencies:

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.

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 Sponsor shall design visibility enhancements for the following locations sufficient to alert drivers to the presence of pedestrians:

- Alameda Tower
- Chinatown/State Park Station

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.

The mitigation relies on the City for the definition of the specific measures. There has been no demonstration that the measure will fully reduce significant impacts regarding hazards to less than significant levels. A clear standard has not been articulated. The measure lacks a mechanism to stop the Project, or require additional mitigation or additional environmental review, if the responsible agency believes impacts have not or cannot be reduced to less than significant levels, or the responsible agency fails to comply with the measure or to accept delegation.

Other measures that rely on delegation to responsible agencies and thus lack substantial evidence they will be implemented include:

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 the 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 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.

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 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:

- 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.

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 **LADWP, LASAN, SoCalGas, 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;
- 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.

Response P700-33 This comment provides a general recitation and characterization of the Draft EIR. Refer to Response P700-13 for a discussion of how the EIR need not provide evidence of whether an agency has “accepted” the delegation. A lead agency may presume that a responsible agency will act in accordance with its duties, and even then, retains the authority to ensure implementation of mitigation measures is occurring. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the proposed Project’s mitigation measures comply with CEQA and would not impermissibly defer mitigation, as well as how the use of plans in mitigation measures does not constitute impermissible deferral. Such actions are commonplace under CEQA where additional study is required but is not appropriate or otherwise feasible at the time of CEQA review, for example, where ground disturbance and excavation is infeasible prior to project approval. CEQA does not require plans and studies contemplated in mitigation measures to be developed during the Draft EIR process or prior to project approval, and recognizes that the development of plans or future studies may be appropriate in order 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. Moreover, as demonstrated in Section 7.0, Mitigation Monitoring and Reporting Program, and Table 7-1, Mitigation Monitoring and Reporting Program (MMRP), of the Final EIR, the MMRP prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure. Refer to Response P700-32 for a discussion of how the City is a responsible agency under CEQA for the EIR and was consulted during the preparation of the EIR. In addition, California Department of Parks and Recreation is a responsible agency under CEQA for the Draft EIR and was consulted during the preparation of the Draft EIR.

Comment P700-34 In addition, the mitigation measures in question do not provide an adequate mechanism for the Lead Agency to ensure that implementation of the mitigation measures occurs in accordance with the specified Plans. In the absence of wording in the mitigation providing a mechanism for stopping the Project, pending additional environmental review, if the responsible agency does not demonstrate to the Lead Agency successful compliance with the mitigation measures by a time certain, it cannot be concluded that impacts are less than significant.

Furthermore, a mechanism for the Lead Agency to ensure and demonstrate successful compliance with these type of mitigation measures may not be feasible. In the instant case, the Lead Agency has limited permitting responsibility, and thus has

limited opportunity to stop project construction and initiate subsequent or supplemental environmental review if the mitigation measures are not implemented or the responsible agencies fail to fully mitigate impacts. This is because the Lead Agency's permitting responsibility, according to DEIR page 2-61 and as discussed above, is quite limited.

As documented on pages 2-57 to 2-62 of the DEIR, the preponderance of permitting responsibility is vested in other public agencies. The listed mitigation measures are therefore inadequate and the potential for impacts in these issue areas thus remains. The DEIR must be corrected to identify these impacts and recirculated.

Response P700-34 Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how the mitigation measures for the proposed Project would not impermissibly defer mitigation, and contain appropriate enforcement mechanisms and performance standards in compliance with CEQA. Refer to Response P700-33 for a discussion of how the Mitigation Monitoring and Reporting Program prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-35 VII. THE DEIR FURTHER FAILS BECAUSE OF ITS INADEQUATE ANALYSIS OF LIGHT AND GLARE IMPACTS.

As noted by the Court in the recent Save Our Capitol case: "Aesthetic issues also include the environmental impact of light and glare caused by a project. (See, e.g., Taxpayers for Accountable School Bond Spending v. San Diego Unified School Dist. (2013) 215 Cal.App.4th 1013, 1038, 156 Cal.Rptr.3d 449; Guidelines, Appendix G.)" The DEIR's analysis of the Project's light and glare impacts is fatally flawed.

This is an unusual project in its generation and distribution of light. First, while much of the Project's footprint is in urbanized Los Angeles, the alignment also crosses wildlife habitat, but the Biological Resources section of the DEIR devotes only three sentences to any potential impact on wildlife in the Gondola corridor from the effects of light from the Broadway Junction, the Stadium Tower, or the passage of hundreds of lighted gondola cabins over wildlife habitat in the proposed Project's corridor every night that there is a game or event at Dodger Stadium, or other times when the Project would be used. (DEIR, p. 3.4-19.)¹¹ Even this cursory discussion does not present actual evidence of lack of impact. Instead, it only observes that lighting would be low-level and directed at the area being illuminated, and that "[d]ue to the high level of exterior lighting currently present in the urbanized BSA, lighting proposed by the Project is not anticipated to have an indirect impact on bird and bat species." (Id.) No citation to any authority is given for this passive-voice conclusion, and no actual

evidence is presented as to the amount of light that would be shed on birds, bats, or other wildlife and their habitat in the Project impact area.

Further, the discussion, such as it is, appears to focus on light from architectural features, and to exclude consideration of light shed from the gondola cabins, which will have interior lighting (DEIR, p. ES-11), and may have exterior lighted advertising, which itself separately contributes to visual and aesthetic blight. The DEIR makes clear that lighted “signage” will be integrated into the Gondola’s “stations, the junction, towers, and cabins,” including signage that “recognizes” Project sponsors; this is otherwise known as advertising. (Id.)

LA ART’s response to Metro’s Request for Information (RFI) states that “[i]n-cabin, on-cabin, and in-station advertising are a part of ARTT LLC’s business model,” and that [w]ith visibility from both the ground and as viewed by riders, the ART system provides a significant and valuable opportunity for potential sponsors and advertisers. Such sponsorship is often packaged with advertising opportunities and can provide substantial upfront and operating capital to subsidize system benefits.” (RFI, p. 36.) The statement is both an acknowledgement that light from the cabins will reach the ground, and that cabins may have interior and exterior advertising; it is reasonable to assume that such advertising may be lighted.

The DEIR must be revised and recirculated to identify the full range of lighting that the Gondola will contribute to areas that are not fully urbanized and that provide habitat for species that require some darkness, and to analyze this light’s potential impacts on such wildlife. The DEIR must also be revised and recirculated to identify the full range of lighting impacts that the Gondola will contribute in terms of aesthetic impacts and glare.

Footnote 11: The DEIR estimates that 6,000 game attendees (12,000 trips for round-trip) would ride the proposed Project in 2026 and 10,000 game attendees (20,000 trips for round-trip) would ride the proposed Project in 2042 per game, reaching the estimated capacity of the system.” (DEIR, p. 3.17-24, emphasis added.) The original proposal estimated cabin capacity at 30-40 passengers each. (Proposal, p. 9.) If the Project carried 12,000 passengers (6,000 each way) on a game night, and if each cabin carried 30 passengers, a total of 400 cabins would fly over the Gondola’s route each game/event night; if a cabin carried 40 passengers, it would be 300 cabins, with all their light.

Response P700-35 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations and the Draft EIR. Refer to Section 3.01, Aesthetics, and the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the operational impacts to lighting from the proposed Project, which would be less than significant. As discussed in Section 3.01, Aesthetics, of the Draft EIR, at page 3.1-53, a Lighting Study was conducted to determine the proposed Project’s potential environmental impacts resulting from its lighting and

illuminated signage program, evaluating impacts with respect to light trespass and glare. The proposed Project would incorporate project design features related to lighting and would not create a substantial source of light or glare that would result in adverse effects to day/nighttime views of the area. Refer to Response P700-37 for additional discussion of the Draft EIR analysis of light and glare. Further, refer to Topical Response K, Signage and Lighting, for discussion of the proposed Project's signage and lighting, with additional technical detail and information provided in the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR.

Refer to Section 3.04, Biological Resources, for a discussion of the proposed Project's potential impacts on wildlife, including how the proposed Project is not anticipated to have an indirect impact on bird and bat species due to proposed Project lighting. Refer to Appendix G, Supplemental Biological Resources Report, of the Final EIR, for discussion of how light in the vicinity of the proposed Project is not anticipated to attract nocturnal migrant birds any more than existing light pollution over the Los Angeles Basin, and lighting from Dodger Stadium field lights is not expected to attract nocturnal migrant birds. If lighting at stadiums were a major attractant to birds during migration, there should be many more examples of this phenomenon, given the large number of professional sports (e.g., baseball, football, soccer), and concert events that occur at such venues at night during spring and fall migratory periods. Further, refer to Responses P700-38 and P700-39 for a discussion of how the proposed Project is not anticipated to contribute to an increase in bat collisions relative to existing obstacles in the vicinity of the proposed Project.

Refer to Topical Response K, Signage and Lighting, for discussion of how the proposed Project's Sign Concept Plan included at Appendix B of the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR, provides that across the entire proposed Project, including stations, the junction, towers, and cabins, the proposed Project is proposing static signage and 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. 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. 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. The proposed Project lighting would include low-level lighting for security and wayfinding purposes. The cite to LA ART's response to Metro's Request for Information predates the initiation of environmental review for the proposed Project

and accordingly does not have any bearing on the sufficiency of the Draft EIR. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-36 Second, should a reader seek further information on this subject, Appendix C, the technical appendix considering light impacts, fails to provide the clear and readily understandable information to the public that is one of the main purposes of an EIR. (Pub. Res. Code § 21061 [“The purpose of an environmental impact report is to provide public agencies and the public in general with detailed information about the effect which the proposed project is likely to have on the environment[.]”])

The Appendix is consistently confusing, often using technical terms without explaining them or providing a context and/or examples a layperson can understand. It uses terms like “candelas,” “vertical and horizontal footcandles,” and “inverse square law” (DEIR, p. ES-23, 3.1-8; Appdx. C, p. 22) without providing clear explanations or real-world equivalents that would allow laypersons to understand what the terms mean and what the reader is being told, and goes so far as to discuss physics and Newtonian laws, presenting material that many lay readers may find indecipherable. (Appdx. C’s Lighting Study, p. 6.) This is a violation of Guidelines Section 15140, which directs that EIRs should be written in plain English. In this respect, the DEIR is less a useful document of information for decision makers and the public on the effects of light from the Gondola than it is a reference manual for those already expert in the subject. Not only must the discussion be expanded to identify all potentially significant impacts of light from the proposed Project, but it must be rewritten in plain English and recirculated, as the Guidelines require.

Response P700-36 Refer to Response P700-35 for discussion of the aesthetic impacts of the proposed Project, including light and glare, which would be less than significant. The Draft EIR addressed impacts from light and glare, in Section 3.01, Aesthetics, and the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR. Proposed Project operations would result in a less than significant impact for light and glare, as explained in plain language on pages 3.1-52 to 3.1-53 of Section 3.01, Aesthetics, of the Draft EIR. The Lighting Study is a technical study that utilizes industry-specific language, and remains available to the public should the need for additional information arise upon reviewing Section 3.01. Section 3.01 serves to summarize the technical information in Appendix C for public consumption. CEQA Guidelines section 15140’s requirement that the EIR “shall be written in plain language . . . so that decision makers and the public can rapidly understand the documents” is inapplicable to technical documents attached as appendices to the EIR. CEQA Guidelines section 15147 clarifies that “[t]he information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public” while “highly technical and specialized analysis and data in the body of an EIR should be avoided through

inclusion of supporting information and analyses as appendices to the main body of the EIR.” CEQA does not require that the EIR translate the technical details of the technical appendices into layman’s terms, but requires “a ‘general description’ of the project’s technical characteristics. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5. No new significant environmental impact would result from the proposed Project.

Comment P700-37 Third and finally, the DEIR presents as “proof” that particular Project light sources will comply with a particular light standard – and will not have a significant impact – solely because that light source is exempt from the particular standard. (See, e.g., Appendix C, p. 88 [“[T]he proposed Project’s lighting and signage would comply with the [Cornfields Arroyo Specific Plan] requirements where they apply at the Chinatown/State Park Station because the Project’s light fixtures and signage are exempt from the [Cornfields Arroyo Specific Plan] exterior lighting requirements.”]) The DEIR also claims that the Project’s light sources comply with the Cal Green (state building energy code) standards in that they are exempt from those standards. (*Id.*) This is faulty reasoning; merely because a particular source of light is exempt from a standard does not mean that the light it spreads has no significant impact.

Protect the Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal.App.4th 1099, at 1109, holds that “notwithstanding compliance with a pertinent threshold of significance, the agency must still consider any fair argument that a certain environmental effect may be significant.” The case holds that even if a project actually does comply with an applicable standard, the agency may not conclusively presume that such compliance guarantees that the project will have no significant environmental impact. Analogously, and perhaps with greater force, if a particular light source is exempt from an applicable standard, an agency should not be able to conclusively presume that the source will have no significant impact, unless the agency presents specific, factual proof to support that conclusion.

The existence of an exemption is not evidence, let alone substantial evidence, of no significant impact, as the DEIR assumes. It is simply a failure by the lead agency, and an omission by the DEIR, to disclose, study and mitigate potentially significant impacts. The agency that set the standard may have created the exemption for many reasons, such as cost, technical feasibility, or lack of agency resources to enforce the standard without the exemption, rather than lack of potentially significant impact. Considerations such as feasibility can excuse an agency from certain types of mitigation for a project’s significant environmental effects (Pub. Res. Code §§ 21002, 21081), but they do not and cannot excuse the lead agency from identifying all significant impacts of a project.

The exemptions from regulatory standards cited in the DEIR should not be regarded, per se, as evidence – let alone substantial evidence – of lack of significant impact. On the contrary, a lead agency is required to “use its best efforts to find out and disclose

all that it reasonably can.” (Guidelines § 15145.) The agency may not simply note the exemption and stop the analysis, as the DEIR does. Lack of an applicable standard is not a get-out-of-jail-free card for environmental analysis. The DEIR must be revised and recirculated to examine the potential impact of Project light sources, regardless of their alleged exemption from particular standards.

Response P700-37 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Section 3.01, Aesthetics, and the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR, for discussion of the operational impacts to lighting from the proposed Project.

The analysis of light and glare in the Draft EIR provides substantial evidence to support the conclusion that the impact would be less than significant.

As discussed in Section 3.01, Aesthetics, of the Draft EIR, at page 3.1-53, a Lighting Study was conducted to determine the proposed Project’s potential environmental impacts resulting from its lighting and illuminated signage program, evaluating impacts with respect to light trespass and glare. The proposed Project would incorporate project design features related to lighting and 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, as the Lighting Study concluded, impacts would be less than significant. As discussed on page 3-1-57 of Section 3.01, Aesthetics, of the Draft EIR, AES-PDF-A would be implemented to ensure that (i) Building Lighting would not exceed 60 watts; (ii) Building Lighting outdoor luminaires would not exceed 6200 initial lumens; (iii) Sign Lighting luminance would not exceed 10,000 cd/m² during the day or 300 cd/m² at night; (iv) sign lighting luminance would transition smoothly from daytime luminance to nighttime luminance and vice versa; and (v) illuminated signs that have the potential to exceed 30 cd/m² would include an electronic control mechanism to reduce sign luminance to 300 cd/m² at any time when ambient sunlight is less than 100 footcandles.

As explained in Section 3.01, Aesthetics, of the Draft EIR, at page 3-1-32, with respect to light and glare, the proposed Project would have a significant impact if it would “[c]reate a new source of substantial light or glare which would adversely affect day or nighttime views in the area.” As explained on page 13 of the Lighting Study, the City of Los Angeles CEQA Thresholds Guide states that the determination of significance shall be made on a case-by-case basis, considering the following factors:

- The change in ambient nighttime levels as a result of project sources; and
- The extent to which project lighting would spill off the Project sites and affect adjacent light-sensitive areas.

Based on these factors, the Lighting Study evaluated whether the proposed Project would create a significant impact with regard to artificial light and glare if:

- The Project Building Lighting illuminance is greater than 2.0 foot-candles at a residential property boundary.
- The Project Sign Lighting illuminance is greater than 3.0 foot-candles at a residential property boundary.

or:

- The Project Building Lighting or Sign Lighting creates new high-contrast conditions visible within the field of view from a residential property.

And based upon the California Vehicle Code:

The Project would create a significant impact with regard to drivers of motor vehicles if the maximum measured brightness of the light source within 10 degrees from the driver's normal field of view exceeds 1,000 times the minimum measured brightness in the driver's field of view, except when the minimum values are less than 10 foot-lamberts, or at minimum luminance less than 10 foot-lamberts, the maximum measured source brightness exceeds 500 fL plus 100 times the angle, in degrees, between the driver's field of view and the light source.

In addition to these significance thresholds, as part of the Lighting Study's analysis of light trespass, the Lighting Study also evaluated the proposed Project for compliance with a number of regulatory standards to support the conclusion that light trespass impacts would be less than significant. Specifically, the Lighting Study analyzed the proposed Project for compliance with: the Los Angeles Municipal Code (LAMC), CALGreen, the CASP, and the RIO, discussed below. While the light trespass requirements of the LAMC generally do not apply to lighting for projects within the public rights-of-way, the Lighting Study analyzed the proposed Project with respect to the LAMC requirements to present a conservative analysis of any potential impact. The Lighting Study concluded that the proposed Project's lighting and illuminated signage would comply with the LAMC light trespass illuminance requirements, and that the lighting and illuminated signage would either be in compliance with or exempt from CALGreen, the CASP, and the RIO requirements.

The CALGreen, CASP, and RIO standards provide for very low light trespass levels for certain types of lighting. Importantly, however, these standards recognize that these light trespass levels are not appropriate for all types of lighting and therefore provide exemptions for certain types of lighting. For instance, as explained on page 2 of the Lighting Study, CALGreen exempts lighting required for ADA access and for public right of way illumination. Signage lighting is also exempt from CALGreen. Similarly, as explained on page 2 of the Lighting Study, the CASP includes Section 2.3, paragraph E.2, Exemptions, which states "The following outdoor lighting fixtures and activities are exempt from the requirements of this section: . . . Internally illuminated signs", "[a]rchitectural lighting whether it is freestanding or attached to a building,

provided the lighting does not exceed an intensity of 60 watts” and “[p]edestrian lighting that does not have an intensity greater than 60 watts.” Therefore, because all proposed Project signs are internally illuminated, they are exempt from the CASP light trespass requirements. In addition, the proposed Project’s building lighting is either architectural lighting or pedestrian lighting and, as discussed above, the proposed Project includes AES-PDF-A which stipulates that all architectural lighting or pedestrian lighting is less than 60 watts. Therefore, the proposed Project is exempt from the CASP light trespass requirements.

Regarding the RIO, the Lighting Study concluded that in certain locations the proposed Project would exceed the RIO 0.20-foot candle maximum light trespass illuminance at the proposed Project property line and the 0.01 footcandle maximum light trespass illuminance at 15 feet beyond the proposed Project property line. Although the proposed Project would exceed the RIO requirements in certain locations, which would represent a conflict with the RIO, the environmental effect of the lighting levels would not represent a significant impact on the environment. The areas where the proposed Project lighting would exceed the RIO at the eastern boundaries of the proposed location of the Alameda Station, the Alpine Tower, and where the cabins travel along the proposed Project alignment from W. College Avenue to Alameda Station are urban areas with existing lighting that exceeds the maximum illuminance defined by RIO. These urban areas require higher illuminance for safety and security. Further, the locations of the proposed Project’s components within the RIO District are more than 2,600 feet from the LA River, and therefore have no direct influence on the lighting within or adjacent to the LA River. Additionally, as discussed in Section 2.10, Required Permits and Approvals, of the Draft EIR, the proposed Project would seek relief from the RIO District and would seek a Specific Plan pursuant to LAMC section 11.5.7 to provide for consistent application of proposed Project design standards, limitations, and operational measures, including lighting standards approved by the City in recognition of the proposed Project’s unique characteristics, including unique opportunities for public benefits and unique constraints posed by the proposed Project’s location which are not experienced by other sites. With approval of the Specific Plan, there would be no conflict with the RIO.

Therefore, the analysis of light and glare in the Draft EIR provides substantial evidence to support the conclusion that the impact would be less than significant. By way of the analysis in the Lighting Study, which evaluated impacts using established significance thresholds under the CEQA Guidelines, City of Los Angeles CEQA Thresholds Guide and the California Vehicle Code, and further supported the analysis with an analysis of compliance with regulatory standards, Metro considered and resolved every fair argument that can be made about the possible significant environmental effects to lighting of the proposed Project, using its best efforts to find out and disclose all that it reasonably could. (CEQA Guidelines § 15145.)

This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines Section 15088.5.

Comment P700-38 VIII. THE DEIR VIOLATES CEQA BY FAILING ADEQUATELY TO ADDRESS BIOLOGICAL RESOURCES IMPACTS.

According to DEIR page 3.4-12, among the special-status wildlife species identified in the California Natural Diversity Database (CNDDB) in the study area are: western mastiff bat (*Eumops perotis californicus*; SSC), hoary bat (*Lasiurus cinereus*; tracked by CNDDB), big free-tailed bat (*Nyctinomops macrotis*; SSC). Furthermore, DEIR page 3.4-16 indicates the presence of possible bat habitat in the Project vicinity:

With the presence of potentially suitable tree roosting habitat in the BSA in the vicinity of the proposed Alameda Station and Dodger Stadium Station sites, and the proximity of the SR-110 overpass to the Stadium Tower, as well as historic records of three special-status bat species (western mastiff bat, hoary bat, and big free-tailed) in the vicinity of the BSA, there is a remote chance that an individual or small group of special-status bats could occur in the BSA.

Although the DEIR did address the potential for construction-related impacts to bats and to provide mitigation for significant impacts, it did not include a robust analysis of the potential operational impacts of the Project on bats. Additionally, statements regarding potential operational impacts on bats and bat behavior are not supported by substantial evidence.

Response P700-38 The Draft EIR addressed impacts to biological resources, including special status bat species, in Section 3.04, Biological Resources with supporting data provided in Appendix E, Biological Resources Assessment, of the Draft EIR. As stated on pages 3.4--13 and 3.4-17 in Section 3.04, the proposed Project has the potential to impact special status bat species as result of tree removal during construction. These impacts would be reduced to less than significant with implementation of Mitigation Measure BIO-A. Further, operational impacts to bats are discussed on page 3.4-19, in Section 3.04 and would be less than significant because the proposed Project would operate in a highly disturbed urban area, and therefore bats are unlikely to be impacted by the relatively minor change in environment. Moreover, lighting would be low-level and primarily integrated into the architectural features. Exterior lighting would be shielded and/or directed toward the areas to be lit, limiting spillover into adjacent habitats potentially suitable for bats. Due to the high level of exterior lighting currently present in the urbanized BSA, lighting proposed by the proposed Project is not anticipated to have an indirect impact on bird and bat species. Given the relatively short length of the alignment, the heavily 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. As discussed in Section 3.04, and Appendix E of the Draft EIR and Appendix G, Supplemental Biological Resources Report, of the Final EIR, the proposed Project is

not anticipated to contribute to an increase in bat collisions relative to existing obstacles in the vicinity of the proposed Project. 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. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., CEQA Guidelines § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts.

Comment P700-39 The proposed Project includes the operation of moving lighted gondolas, suspended 159-175 feet in the air. As noted by Orbach and Fenton, bat collisions “often occur with lighted objects, suggesting ambient light may deleteriously affect obstacle avoidance capabilities.”¹² As noted by Orbach and Fenton:

Many anecdotal reports describe bats colliding with large stationary objects such as television towers [1–6], lighthouses [7], and windows [8–9] that should have been detected by echolocation and avoided. Furthermore, many of these collisions involve illuminated objects that should have been detected by vision.¹³

The proposed Project would potentially increase the hazard risk by providing what are essentially low-flying lighted objects. The presence of the Project may thus pose increased hazards to local bats, and may result in bat avoidance of the area, or changes in bat behavior.¹⁴ This needs to be more fully addressed in the EIR for the proposed Project, given the potential for significant impacts to bat species.

Footnote 12: See Orbach DN, Fenton B (2010) Vision Impairs the Abilities of Bats to Avoid Colliding with Stationary Obstacles. PLoS ONE 5(11): e13912. doi:10.1371/journal.pone.0013912 , available at: <https://journals.plos.org/plosone/article/file?id=10.1371/journal.pone.0013912&type=printable>

Footnote 13: See, e.g.,

1. Van Gelder RG (1956) Echolocation failure in migratory bats. Transactions of the Kansas Academy of Science 59: 220–222.
2. Ganier AF (1962) Bird casualties at a Nashville TV tower. Migrant 33: 58–60.
3. Gollop MA (1965) Bird migration collision casualties at Saskatoon. Blue Jay 23: 15–17.
4. Avery M, Clement T (1972) Bird mortality at four towers in eastern North Dakota: Fall 1972. The Prairie Naturalist 4: 87–95.
5. Zinn TL, Baker WW (1979) Seasonal migration of the hoary bat, *Lasiurus cinereus*, through Florida. Journal of Mammalogy 60: 634–635.

6. Crawford RL, Baker WW (1981) Bats killed at a north Florida television tower: a 25 year record. *Journal of Mammalogy* 62: 651–652.
7. Saunders WE (1930) The destruction of birds at Long Point lighthouse, Ontario, on four nights in 1929. *The Auk* 47: 507–511.
8. Test FH (1967) Indicated use of sight in navigation by molossid bats. *Journal of Mammalogy* 48: 482–483.

Footnote 14: See also, for example:

<https://www.researchgate.net/publication/272889669> -

<https://movementecologyjournal.biomedcentral.com/articles/10.1186/s40462-020-00238-2> and <https://reader.elsevier.com/reader/sd/pii/S0269749122007667?token=E2D5544E3FDCBC1CB36C2B634EA59800E212792181BC74C9B3EAD90A439962D2CE3C12F07FA69675E047963208206203&originRegion=us-east-1&originCreation=20230108225259>

Response P700-39 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 proposed Project is not anticipated to contribute to an increase in bat collisions relative to existing obstacles in the vicinity of the proposed Project. 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, many of which are lighted themselves, or illuminated by existing ambient urban light sources. 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. Although some studies indicate a propensity for bats to collide with lighted structures such as radio and television towers and lighthouses, these are generally isolated structures in rural areas where the lighting would stand out from surroundings. In contrast, the lighting associated with the proposed Project would contribute only negligibly to the ambient light in this urban environment. Refer to Response P700-38 for a discussion of how the Draft EIR analyzed operational impacts to birds and bats, concluding that the operation of the proposed Project would have a less than significant impact on bird and bat species, as because the proposed Project would operate in a highly disturbed urban area, birds and bats are unlikely to be impacted by the relatively minor change in the environment. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., CEQA Guidelines § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts.

Comment P700-40 **IX. THE DEIR FURTHER VIOLATES CEQA BY FAILING TO FULLY MITIGATE CULTURAL RESOURCE IMPACTS.**

The mitigation measures and PDFs provided for in the DEIR to address vibration related impacts of the Project on historic resources are inadequate to avoid significant impacts. CUL-PDF-8 requires:

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).

First, this is clearly a mitigation measure, not a Project Design Feature. Second, the measure is inadequate because it fails to guarantee that the Project sponsor will retain sufficient financial resources to make any necessary repairs. It may therefore not be feasible. A mitigation measure requiring that the Project sponsor post a bond in an amount sufficient to cover any needed repairs is required to ensure adequate financial resources to address any impacts to the Winery and El Grito mural and to render this mitigation measure feasible. Third, because this is a PDF, it is not legally enforceable through permit or other conditions, and no monitoring responsibility has been established. Fourth, it fails to require independent review of repairs by a responsible agency to ensure that all required work has been completed, and completed consistent with the Secretary's Standards.

Response P700-40 Refer to Response P700-24 for further discussion of CUL-PDF-B. Refer to Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of how CUL-PDF-B is a project design feature because it is not intended to reduce potential cultural resources impacts as there are no significant or direct cultural resources impacts anticipated to the underlying resource. 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 and Reporting Program, of this Final EIR and would be mandatory elements of the proposed Project.

Comment P700-41 MM-VIB-A is not legally enforceable as written. The measure fails to require review and approval of the specified Vibration Monitoring Plan by the Lead or a responsible agency. It also fails to require notification of the responsible monitoring agency should vibrations in excess of the standard be detected, to require all work in the vicinity be stopped pending identification of an appropriate change in construction equipment, to require review and approval by a responsible monitoring agency of any changes to the construction equipment to be used in response to potentially

damaging vibration detection, or to ensure that construction activity will not be resumed until it has been determined that construction can be undertaken without exceeding the vibration standard. This measure therefore does not reduce impacts to a level which is less than significant:

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 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.

In addition, the DEIR fails to explain why vibration monitoring equipment would be placed “at least 26 feet away” from the historic resources of concern. As written, would placement of the monitoring equipment 100 miles away comply with the measure, even though such placement would not allow for detection of damaging vibration levels? The measure needs to specify the maximum distance away from the historic resources that monitoring equipment can be located and still be effective, by specifying that monitoring equipment shall not be located more than x feet from As written, the measure is insufficient to reduce impacts to a level considered less than significant.

These same comments apply to Mitigation Measures MM-VIB-B which suffers from the same problems as MM-VIB-A, which render the measure ineffective in reducing impacts to a level considered less than significant:

- **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.

The DEIR has failed to provide sufficient mitigation to reduce construction impacts on historic resources to a level considered less than significant. Including pursuant to Guidelines Section 15088.5(a), the DEIR must be corrected and recirculated for public comment.

Response P700-41 Pursuant to CEQA Guidelines section 15126.4(A)(2), the EIR's mitigation measures will be fully enforceable through the adoption of conditions of approval and the Mitigation Monitoring and Reporting Program. As demonstrated in Section 7.0, Mitigation Monitoring and Reporting Program, and Table 7-1, Mitigation Monitoring and Reporting Program (MMRP), of the Final EIR, the MMRP prescribes for agency enforcement of mitigation measures for the proposed Project, which will ensure supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure. CEQA does not require that a lead agency be responsible for enforcing all mitigation measures. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the vibration impacts from construction of the proposed Project. Potential vibration impacts resulting from the proposed Project are associated only with construction of the proposed Project; no vibration impacts were identified for operation of the proposed Project. Vibration impacts associated with construction of the proposed Project were analyzed in the Draft EIR both for building damage and human annoyance. CEQA only requires the discussion of mitigation measures that the lead agency determines are feasible and would be effective. The use of non-vibrating equipment or hand tools for construction operations within 26 feet of Avila Adobe, *El Grito* mural wall, and The Old Winery was determined to be feasible and effective in consultation with the Project's construction contractor. For instance, instead of using vibratory rollers the Project's construction contractor could use hand tampers. As explained in detail at pages 3.13-72 to 3.13-73 of Section 3.13, Noise, of the Draft EIR, Mitigation Measure VIB-A requires placement of vibration monitoring equipment at least 26 feet away from Avila Adobe, *El Grito* mural wall, and The Old Winery by a qualified professional for real-time vibration monitoring for construction work at Alameda Station requiring heavy equipment or ground compaction devices, and this equipment would notify the construction crew if vibration levels are within 0.1 PPV, in/sec, of the vibration damage threshold so that the construction crew would modify the construction equipment to ensure that the vibration damage threshold is not exceeded. Twenty-six feet was identified in the Mitigation Measures because the reference vibration levels for vibration generating equipment are provided at 25 feet. In addition, within 25 feet from Avila Adobe (1970s addition), *El Grito* Mural and The Old Winery only non-vibrating equipment or hand tools would be used. Accordingly, 26 feet was

selected as the relevant measuring point for the Mitigation Measure VIB-A and VIB-B because it is where vibration generating equipment could be located. The exact location for the vibration monitoring equipment would be provided in the Vibration Monitoring Plan but it is anticipated that the vibration monitoring equipment would be approximately 26 feet away from Avila Adobe (1970s addition), *El Grito* Mural and The Old Winery to ensure that vibration levels remain below the assumed reference level of 0.21 PPV, in/sec, at 25 feet. In response to this comment and to clarify the intent of Mitigation Measure VIB-A, refer to Section 5.0, Corrections and Additions, in this Final EIR, for a discussion of how Mitigation Measure VIB-A has been updated to read “*approximately 26 feet*” in place of “*at least 26 feet.*” Mitigation Measure VIB-B requires that, for construction work occurring at Alameda Station, at a distance of 26 feet or more from the Avila Adobe, *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 and, if the ground compacting equipment cannot achieve the assumed reference level, equipment with less than 0.21 PPV, in/sec, at 25 feet, non-vibrating equipment, or hand tools would be required for ground compaction activities. In addition, any ground compaction or excavation/drilling operations within 26 feet of Avila Adobe, *El Grito* Mural or The Old Winery structures must be completed with non-vibrating equipment or hand tools. Refer to Appendix M, Noise and Vibration Technical Report, of the Draft EIR, Tables 6-11 and 6-12, for technical assessment of the impact thresholds for Avila Adobe, *El Grito* Mural, and The Old Winery structures and demonstration of the effectiveness of Mitigation Measures VIB-A and VIB-B. With implementation of Mitigation Measures VIB-A and VIB-B during construction of Alameda Station, vibration damage impacts at the Avila Adobe, the Old Winery, and *El Grito* Mural, would be less than significant. This determination is supported by expert analysis provided in Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, which discuss the vibration impacts from construction of the proposed Project. This comment does not show that the additional measures proposed would result in a greater level of effectiveness than the measures incorporated in the Draft EIR. This comment and the comments raised in this letter do not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-42 X. THE DEIR FURTHER VIOLATES CEQA BY FAILING TO PROPERLY IDENTIFY OR MITIGATE LAND USE AND PLANNING IMPACTS.

CEQA requires that a DEIR’s analysis under the Land Use topic disclose and analyze how the Project is *inconsistent* with plans, programs, statutes, ordinances and policies adopted to avoid or mitigate environmental impacts. The Land Use and Planning section of the DEIR, however, consists of an extended “analysis” of the Project’s *consistency* with these documents. This methodological flaw permeates the DEIR’s

analysis, masks numerous conflicts, and misleads the public about the Project's irreconcilable conflicts with multiple binding land use policies.

Response P700-42 The Draft EIR addressed consistency with applicable land use policies and ordinances in Section 3.11, Land Use and Planning, of the Draft EIR. The determination of consistency with applicable land use policies and ordinances is based upon a review of the previously identified planning documents that regulate land use or guide land use decisions pertaining to the Project Study Area. CEQA Guidelines section 15126(d) requires that an EIR discuss inconsistencies with applicable land use plans that the decision-makers should address. Separately, Appendix G of the CEQA Guidelines recommends that a lead agency consider whether the project would 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.

A conflict between a project and an applicable plan is not necessarily a significant impact under CEQA unless the inconsistency will result in an adverse physical change to the environment that is a "significant environmental effect" as defined by CEQA Guidelines section 15382. "An inconsistency between a proposed project and an applicable plan is a legal determination not a physical impact on the environment."¹³ Analysis of conflicts and consistency with applicable plans is included in Section 3.11, Land Use and Planning, of the Draft EIR.

Under the Planning and Zoning Law (Government Code Section 65000 et seq.), strict conformity with all aspects of a plan is not required. Generally, given that land use plans reflect a range of competing interests, a project is considered consistent with the provisions of the identified regional and local land use plans if it meets the general intent of the plans, and would not preclude the attainment of the primary intent of the land use plan or policy. Accordingly, if a project is determined to be inconsistent with specific objectives or policies of a land use plan, but is largely consistent with the land use goals of that plan and would not preclude the attainment of the primary intent of the land use plan, the project would not be considered inconsistent with the plan. In addition, inconsistency with specific objectives or policies of a land use plan does not necessarily mean that the project would result in a significant impact on the physical environment. Rather, to be "consistent," the project must be compatible with the objectives, policies, general land uses and programs specified in the applicable plan," meaning that a project must be in "agreement or harmony" with the applicable land use plan to be consistent with that plan."¹⁴

Analysis of conflicts and consistency with applicable plans is included in Section 3.11, Land Use and Planning, of the Draft EIR.

Comment P700-43 A. Los Angeles State Historic Park General Plan - Inadequate Mitigation.

¹³ Continuing Education of the Bar. Practice Under the California Environmental Quality Act, Section 12.34.

¹⁴ Sequoyah Hills Homeowners Association v. City of Oakland (1993) 23 Cal.App.4th 704, 719.

Because the proposed Project is not consistent with the Los Angeles State Historic Park General Plan,¹⁵ the DEIR identifies the need for the following mitigation measure:

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.

This mitigation measure is outside of the control of the Lead Agency. (As discussed above, its absence as part of this process should also be considered a violation of CEQA’s project description requirements. The General Plan Amendment and Specific Plan, and all other land use plan amendments, should be concurrently provided to the public and decision makers along with a recirculated DEIR.) In an absence of a showing that the responsible agency is willing to implement this so-called mitigation measures, a finding that plan consistency impacts can be reduced to a level which is less than significant is not supported by substantial evidence. The potential for Los Angeles State Historic Park General Plan consistency impacts remains.

Footnote 15: Available at: <https://lastatehistoricpark.org/wp-content/uploads/2021/07/LASHPGeneral-Plan.pdf>

Response P700-43 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. 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 LASHP General Plan. The LASHP 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. As the agency having land use authority over the park will be the Responsible Agency implementing the General Plan Amendment, there is substantial evidence that any potential inconsistencies with the General Plan will be addressed through that General Plan Amendment process. Refer to Topical Response F, Los Angeles State Historic Park for a discussion of the LASHP General Plan Amendment. Refer to Response P700-17 for a discussion of how the Draft EIR is not required to include the land use planning documents within the purview of a responsible agency with the Draft EIR. This comment and the comments raised in this letter do not raise any

significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-44 B. Failure to Identify the Project's Inconsistency With the 2020-2024 Regional Transportation Plan/Sustainable Communities Strategy.

The Project as proposed is not consistent with the RTP/SCS.¹⁶ The Project is not included in the City's Mobility Plan 2035¹⁷ or in the Transportation System Project List¹⁸ used in preparing the Regional Transportation Plan (Connect SoCal 2020 or the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy),¹⁹ and this needs to be explained in the DEIR. Furthermore, the Project is not consistent with almost all of the RTP/SCS goals, as detailed in this comment letter and summarized in the analysis contained in the following table.

Footnote 16: The RTP/SCS is available at: <https://scag.ca.gov/read-plan-adopted-final-connect-socal-2020>

Footnote 17: Available at: https://planning.lacity.org/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf

Footnote 18: Available at: https://scag.ca.gov/sites/main/files/fileattachments/0903fconnectsocal_project-list_0.pdf?1606000813

Footnote 19: Available at: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocalplan_0.pdf?1606001176

Response P700-44 The Draft EIR addressed the proposed Project's compatibility with the 2020-2045 RTP/SCS in Section 3.11, Land Use and Planning, of the Draft EIR. As discussed on page 3.11-4, of the Draft EIR, the Southern California Association of Government (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS), called Connect SoCal, serves as a long-range regional transportation planning tool used to build upon and expand land use and transportation strategies to increase mobility options and achieve a more sustainable growth pattern. As noted on page 8 of Connect SoCal, "SCAG is just one part of a large body of governments and public organizations that collectively plan, construct, operate and maintain the region's transportation system. SCAG's work helps facilitate implementation, but the agency does not directly implement or construct projects." As such, as a long-range regional transportation planning tool, not every proposed transportation project is included in Connect SoCal, and the proposed Project need not be included in such regional planning documents in order to be consistent with their goals and policies.

As noted in the Draft EIR, the proposed Project would introduce a unique new mode of transit for travelers between LAUS and Dodger Stadium. Implementation of the proposed Project would create new, as well as improve, 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. Additionally, the proposed Project would reduce air quality emissions by reducing vehicle trips, as discussed in Section 3.03, Air Quality, of the Draft EIR. As such, the proposed Project would be consistent with Connect SoCal's ten main goals, which are expanded upon on pages 3.11-44 through 3.11-46, in Table 3.11-2 in the Draft EIR. As such, the proposed Project would not conflict with Connect SoCal's applicable goals and impacts to consistency with this plan would be less than significant. The proposed Project is also consistent with multiple Connect SoCal guiding principles related to reducing congestion and improving air quality, as discussed on page 1-7 of the Draft EIR. Refer to Response P700-45 for further discussion of the proposed Project's consistency with the RTP/SCS' goals.

Comment P700-45 DEIR Table 3.11-2 needs to be corrected and recirculated to reflect the following information, and replaced with the following table.

Table 3.11-2 Project Consistency with Applicable 2020-2045 RTP/SCS Goals	
Goal	Consistency Analysis
1. Encourage regional economic prosperity and global competitiveness	The proposed project is a 1.2 mile fixed route aerial transit system, which neither coordinates nor connects with the larger area transit network. Given its limited scale, it does not have the ability to encourage regional economic prosperity and global competitiveness. Furthermore, given its limited ridership and the fare structure represented to the media, the long-term viability of the Project is questionable. The Project is thus not consistent with this goal.
2. Improve mobility, accessibility, reliability, and travel safety for people and goods	The proposed Project would provide limited additional mobility primarily to ticket holders of Dodger Stadium events by providing a fixed-route system. Greater flexibility can already be achieved in serving these users via the existing Dodger Stadium Shuttle. As designed, the Project competes for ridership at two of its three stations with the existing bus and light-rail transit system. There is nothing inherent in the Project that would improve overall transit system reliability or safety. The system is not specifically designed for goods movement. It is questionable whether the Project will result in any real or substantial reduction in passenger vehicle miles traveled and associated GHG emissions. The Project is thus not consistent with this goal.
3. Enhance the preservation, security, and resilience of the regional transportation system	The Project is a new privately constructed and operated fixed-route ART with limited projected ridership. Given the high cost of construction and operation, the limited projected ridership, and the fare structure which has been represented in the media, which would generate limited operational revenues, the long-term viability of the ART as a private project is questionable. There is the likelihood that a failing ART may be required to be taken over by Metro in the future, which would take resources away from the existing public transit system to support an expensive, 1.2-mile system with limited inter-system connectivity. The Project may therefore threaten the

Table 3.11-2 Project Consistency with Applicable 2020-2045 RTP/SCS Goals	
Goal	Consistency Analysis
	preservation, security and resilience of the regional transportation system by drawing operating capital from the regional system. The Project is therefore not consistent with this goal.
4. Increase person and goods movement and travel choices within the transportation system	The Project would have limited ridership, which would mainly consist of Dodger Stadium ticket holders and tourists. Dodger Stadium ticket holders are currently served by a Metro-operated Shuttle from Union Station. Most other riders would be diverted from the existing transit system to experience the novelty of the ART. The Project is therefore not consistent with this goal.
5. Reduce greenhouse gas (GHG) emissions and improve air quality	Given the limited Project ridership and the fact that most of the riders would be diverted from other modes of transit, rather than from automobile use, and the Project's potential to induce additional tourist VMT as tourist commute via Uber or auto to access this ride, the reduction in GHG, if any, would be very limited. The Project is therefore not consistent with this goal.
6. Support healthy and equitable communities	The DEIR indicates the Project is consistent with this goal because 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 multimodal 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." However, the mobility hub is only a "potential" component of the Project, rather than a committed part of the Project. The Project sponsor can therefore not rely on the potential mobility hub as the basis for concluding consistency with this goal. The Project is therefore not consistent with this goal.
7. Adapt to a changing climate and support an integrated regional development pattern and transportation network	Given the limited, 1.2-mile length of the system, the fact that most of the riders are likely to have been diverted from other modes of transit, and the ability of Metro to convert the existing bus fleet to green energy over time, the Project's contribution to climate change response is highly questionable. The Project would result in the construction of a highly visible, fixed-route system, limiting the ability of the Project to adapt to a changing regional development pattern. Given the Project's lack of connectivity to existing transit modes, the Project works against an integrated transportation network. The Project is therefore inconsistent with this goal.
8. Leverage new transportation technologies and data-driven solutions that result in more efficient travel	While the Project does represent the introduction of a new transportation technology to the region, it introduces a technology that is not easily or cheaply integrated with the existing transit system. The lack of integration with the existing transit system would force users whose trips are not limited to between Union Station, Chinatown and

Table 3.11-2 Project Consistency with Applicable 2020-2045 RTP/SCS Goals	
Goal	Consistency Analysis
	Dodger Stadium to have to transfer to other modes to complete their trips. This is not efficient. Furthermore, the 1 hour 12 minutes – 2 hour wait-times to board the system after Dodger Games is also not efficient. The Project is therefore not consistent with this goal.
9. Encourage development of diverse housing types in areas that are supported by multiple transportation options	As noted in the existing DEIR consistency analysis: “The proposed Project would encourage development of diverse housing types in areas that are supported by multiple transportation options by providing an additional transportation option for the residents and visitors in the City of Los Angeles, and enabling access between Dodger Stadium, the surrounding communities, and the regional transit system accessible at LAUS.” This is why the Project would be growth-inducing and the DEIR must analyze it as such.
10. Promote conservation of natural and agricultural lands and restoration of habitats	The DEIR states that: “The proposed Project would promote conservation of natural and agricultural lands and restoration of habitats by being constructed in a previously developed area, and would not impede the region’s goal of conserving land and restoring habitats.” Not destroying habitat is not the same as promoting the conservation of natural lands and habitats. The Project does nothing to further this goal.

Response P700-45 This comment provides a characterization of the proposed Project’s policy consistency analysis contained in Section 3.11, Land Use and Planning, of the Draft EIR. As identified therein, a consistency analysis of the proposed Project was conducted with state, regional and local plans and documents including the Southern California Association of Government (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS) which is provided in Table 3.11-2, on pages 3.11-45 and 3.11.46. The 2020-2045 RTP/SCS serves as a long--range regional transportation planning tool used to build upon and expand land use and transportation strategies to increase mobility options and achieve a more sustainable growth pattern.

As indicated in Table 3.11-2 of the Draft EIR, the proposed Project would be compatible with the goals of the 2020-2045 RTP/SCS. While some Goals are not applicable to individual transportation projects (such as Goals 1, 3, 6, 7, 9, and 10), nevertheless the proposed Project would not conflict with the applicable goals of the 2020-2045 RTP/SCS. Specifically, consistent with Goal 2, the proposed Project would improve mobility, accessibility, reliability, and travel safety for people and goods by reducing passenger vehicle miles traveled and by providing a new mode of public transportation in the form of a high-capacity aerial rapid transit connecting the regional transit system at LAUS, Dodger Stadium, the Los Angeles State Historic Park, Elysian Park, and surrounding communities. The proposed Project would also improve the Dodger Stadium visitor experience by providing efficient, high-capacity,

and faster alternative access to Dodger Stadium. Implementation of the proposed Project also would create both new and improved, 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. As discussed in Section 2.0, Project Description, and Topical Response C, Project Features, of the Draft EIR, the proposed Project creates a first/last mile transit link for residents and businesses in surrounding communities while unifying and connecting communities through transit mobility access, consistent with Goals 7 and 8. Additionally, the proposed Project would reduce air quality emissions by reducing vehicle trips, as discussed in Section 3.03, Air Quality of the Draft EIR, consistent with Goals 5 and 6.

The comment mischaracterizes many aspects of the proposed Project and otherwise does not provide a basis for the speculative assertions provided. As discussed in the Technology Penetration Analysis, included in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, a large capacity for a new mode of transportation in Los Angeles will allow passengers to see the potential for other emerging innovations to be integrated into the public transit system, and the proposed Project would thus exemplify how alternative transportation technology can be integrated into a city's transportation infrastructure and will show that new technology can successfully operate in concert with other existing modes of transportation, consistent with Goal 7.

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 H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how 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.

With respect to the comments in Goal 3, refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Refer to Section 2.6, Ridership, of the Draft EIR for a discussion of how 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.

With respect to the comments in Goal 8, refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queueing at stations, and pre-game and post-game transportation. Post-game queues at Dodger Stadium were estimated based on assumptions about the departure patterns and estimates of walk times from the various seating areas within the stadium. Those seated the furthest away from the Dodger Stadium Station would take more time to arrive at the Station, much like how it is currently for passengers riding the Dodger Stadium Express. In addition, 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. The post-game/event queue for the proposed Project would be constantly moving as cabins would depart every 23 seconds.

As discussed in Section 5.0, Corrections and Additions, of this Final EIR, 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/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.

Refer to Response P700-69 with regards to Goal 9 for a discussion of the potential growth-inducing impacts of the proposed Project.. Contrary to the assertion that the proposed Project would be inconsistent with Goal 10, the proposed Project is located in a developed and urbanized area, and would not impede the region's goal of conserving land and restoring habitats. Refer to Section 3.04 Biological Resources with supporting data provided in Appendix E, Biological Resources Assessment, of the Draft EIR, for a discussion of how the proposed Project would have less than significant impacts to biological resources with mitigation. This conclusion is further substantiated by Appendix G, Supplemental Biological Resources Report, of this Final EIR. As discussed in Appendix G, while the removal of the relatively small amount of wooded habitat for the proposed Project would result in a marginal reduction of suitable tree habitat in the short-term, in the long-term, the replacement of the trees proposed in connection with the applicable tree replacement requirements (and memorialized in BIO-PDF-F) would more than offset any realized impacts associated

with the proposed Project. In addition, in order to provide additional environmental benefits, the proposed Project would implement BIO-PDF-A through BIO-PDF-H. BIO-PDF-A, which would establish a Tree Protection Zone to protect trees during construction that are not identified to be removed, but are either in the construction footprint, or in close proximity to the construction footprint, is discussed in Section 3.04 of the Draft EIR. BIO-PDF-B through BIO-PDF-H are discussed in Section 5.0, Corrections and Additions, of this Final EIR.

As such, the proposed Project would not conflict with the applicable goals of the 2020-2045 RTP/SCS and impacts to consistency with this plan would be less than significant.

Comment P700-46 C. Failure to Identify or Mitigate Inconsistency With the City of Los Angeles General and Specific Plans.

As previously noted in this comment letter and on DEIR pages 2-61 to 2-62, the Project requires a Specific Plan, and “relief” from the River Implementation Overlay District and Cornfield Arroyo Specific Plan. That is because the Project is not consistent with the General Plan and zoning for the area, or with the associated implementing overlay and Specific Plan. These discretionary approvals represent unidentified mitigation for Project land use plan consistency impacts. These discretionary approvals are outside of the control of the Lead Agency. Absent a showing that the responsible agency is willing to implement these de facto mitigation measures, a finding of plan consistency is not supported by substantial evidence. The potential for Los Angeles City General Plan consistency impacts remains and must be so identified in the DEIR. In turn, those General Plan and Specific Plan discretionary approval requests must be the subject of their own full-fledged CEQA review.

Response P700-46 Refer to Response P700-13 for a discussion of how CEQA does not require the EIR to include a “showing” of responsible agency approval, and how a lead agency may presume that the responsible agency will act in accordance with its duties. The EIR is intended to provide environmental clearance for the discretionary entitlements, reviews, and approvals required for implementation of the proposed Project outlined in Section 2.10, Required Permits and Approvals, of the Draft EIR, inclusive of the approval of a Specific Plan by the City of Los Angeles. Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project’s consistency with various land use planning documents, including the City of Los Angeles General Plan, City of Los Angeles Zoning Code, River Implementation Overlay District, and Cornfield Arroyo Specific Plan. As discussed in Section 3.11, the Project Sponsor is seeking to create a Specific Plan as part of the proposed Project to allow for the proposed Project to be fully consistent with the surrounding zoning and to otherwise provide for the consistent application of Project design standards, limitations and operational measures. Accordingly, with this approval, the proposed Project would not conflict with the applicable land use documents at the time of Project implementation, and the impact would be less than significant.

Comment P700-47 XI. THE DEIR FURTHER VIOLATES CEQA DUE TO ITS INACCURATE AND FLAWED TRANSPORTATION ANALYSIS.

The DEIR on page 1-5 claims that as “detailed in Table 3.17-6 of this 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.” However, the DEIR fails to show the analytic route by which this number was reached in any independently verifiable fashion. This forecast is based on a black-box calculation, not supported by substantial evidence or common sense.

A. Common Sense Explanation of Why The VMT Calculations Are Fatally Flawed.

CEQA Guidelines Section 15064.3(a) defines VMT as “**the amount and distance of automobile travel attributable to a project**”. Guidelines Section 15064.3(b)(4) requires:

(4) Methodology. A lead agency has discretion to choose the most appropriate methodology to evaluate a project’s vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project’s vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section.

The DEIR has failed to comply with this standard, both when it comes to the ridership estimates, and then when it comes to the VMT calculation. Table 3.17-4 from the DEIR, reproduced below, shows the Project’s anticipated ridership. It should be noted that of these riders, many of the game ticket holders are likely already to be using Metro’s free shuttle service from Union Station, or otherwise accessing the Stadium via transit. For these riders, there would be no VMT reduction, as diversion from the existing shuttle or existing transit does not count for purposes of calculating a VMT reduction. It should also be noted that Metro has the capacity to increase the number of shuttle buses to meet demand and the option to convert these buses to clean energy, which makes the usefulness and benefit of investment in the Project highly questionable.

Ridership projections

Table 3.17-4: Proposed Project Estimated Daily Riders

Ridership Market Segment	Daily Weekday Riders				Daily Weekend Riders					
	2026		2042		2026			2042		
	Low Day	High Day - Game	Low Day	High Day - Game	Low Day	High Day - LASHP	High Day - Game	Low Day	High Day - LASHP	High Day - Game
Dodger Stadium Access (Game/Stadium Event Ticket Holders)										
Alameda Station		5,100		8,500			5,100			8,500
Chinatown/State Park Station		900		1,500			900			1,500
Tourists	2,575	1,265	2,575	1,265	3,570	3,570	1,210	3,570	3,570	1,210
Dodger Employees	30	140	30	140	30	30	140	30	30	140
Other Special Events										
Special Events at LA State Historic Park						1,120			1,120	
Neighborhood Riders										
Alameda Station	400	400	500	500	200	200	200	250	250	250
Dodger Stadium Station	400	400	550	550	200	200	200	300	300	300
Chinatown/State Park Station (Neighborhood/Regional and Daily Park Access)	425	425	575	575	320	320	320	370	370	370
Total Daily Riders										
Total Daily Riders	3,830	8,630	4,230	13,030	4,320	5,440	8,070	4,520	5,640	12,270

Note: This table shows the number of daily riders. It is assumed that each rider will make two trips.

LASHP = Los Angeles State Historic Park.

Total ridership in the high game day scenario exceeds the 10,000 riders destined to the game since the Project will operate during the day before the game, including carrying employees and neighborhood riders.

There are only 81 Dodger home games in any given season.²⁰ As shown in Table 3.17-4, it is anticipated that 5,100 in 2026, rising to 8,500 persons in 2042 will access Dodger Stadium on game day via the Project from Union/Alameda Station. The DEIR needs to explain the basis for the assumed increase from 2026 to 2042, which it currently fails to do.

Currently Metro operates a free shuttle to Dodger Stadium from Union Station, the Dodger Stadium Express. According to Yelp reviewers, travel time for the Shuttle is 15-20 minutes. According to Metro: "In 2019 the Dodger Stadium Express transported 377,180 passengers, the largest number of passengers of any given year."²¹ This equates to an average of 4,657 passengers from the Shuttle's two locations: Union Station and Harbor Gateway Transit Center.²² According to DEIR page 2-10, the Dodger Stadium Express buses only carried approximately 1,850 riders on average per game; however, no source is given for this figure. Please provide a verifiable source.

This means that at least 1,850 of Project riders on game day are likely to be users diverted from the existing free bus Shuttle, and thus do not count as a reduction in VMT. The number of actual new and diverted game day riders will be a function of fare, which has not been disclosed in the DEIR. At maximum, 3,250 Project users in 2026, increasing to 6,650 users in 2042 would thus be ticket holders either diverted from other transit or newly using transit to access the Stadium on game day. Given the post-game loading time for the Project of up to approximately 1 hour 12 minutes in 2026 increasing to 2 hours in 2042 given projected ridership, it is unclear how many ticket holders will want to use this private gondola system, which requires access via Union Station, and which will likely charge a fare in order to maintain the system.²³

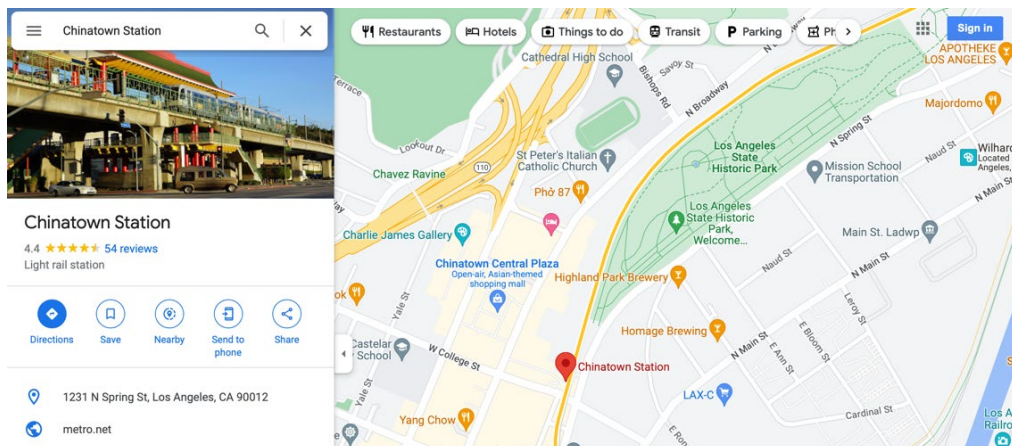
Should game day ticket holders choose to make use of the Project, it is unclear how much of a VMT reduction will actually occur, as it would depend on both how, and from how far away, users come to access the system.

In terms of VMT reduction, it does not appear appropriate to count tourist trips when calculating VMT reduction, as tourist trips are likely induced trips. In fact, the VMT calculation would need to account for how tourists access the system and whether the Project induces automobile trips as tourists take Uber or other vehicles to access one of the only three Project stations. The Project is thus likely to result in an increase in tourist-related VMT.

Commuters making use of the Project are likely to already be using public transit. Given that the Project only has three stations, and the location of those stations, it is unlikely that commuters will switch from bus or rail service to make use of the Project. Whether commuters switch to the Project would be a function of their ultimate destination, relative fare, relative wait time, relative walk time, relative travel time, relative transfer time, and relative numbers of transfers between trip ends. Regardless, commuters that switch from public transit to the Project also cannot be counted in the calculation of any Project-induced VMT reduction.

The DEIR fails to justify why neighborhood users would want to use the Project to access the Dodger Stadium station. There is currently no reason to access Dodger Stadium, other than to see a game. Do the ridership projections assume additional development at Dodger Station? (See piecemealing discussion above.) If so, this needs to be disclosed and analyzed in the DEIR. If not, any assumption of neighborhood users of the system is not supported by substantial evidence.

Instead, any neighborhood users would more likely make use of the system to go between the Chinatown Station and Union/Alameda Station, which each have trip attractors. However, there are already Metro stations at Chinatown and Union Station, as shown in this Figure, which also shows the proximity of the existing Metro Chinatown Station to the Los Angeles State Historic Park.



In making a trip between Chinatown and the Union Station area, potential riders would be deciding between the use of the Project system, existing Metro public transit, walking, or making the trip via automobile. Only trips diverted from automobile use, to Project use, would count towards a VMT reduction. Given that it is approximately 0.6 miles, or a 12-minute walk between the two existing stations according to Google Maps, and the Metro Gold Line already runs between the existing Metro Chinatown Station and Metro Union Station, use of the Project to travel between these two locations would be dependent on its relative cost, the minor difference in proximity to nearby uses between the Metro and Project systems, and the user's ultimate destination.

Users that don't have both an origin and destination at one of the Project stations would be more likely to continue to use other existing public transit, which would not require a transfer to reach, or fewer transfers to reach their destination. The likelihood that any riders would be diverted from automobile use, given the proximity of existing transit is unlikely. Therefore, VMT reductions would also be unlikely to result from the Project, from neighborhood users traveling between these two locations.

The VMT reduction claims in the DEIR are not supported by substantial evidence or common sense. It appears that the VMT reduction claims are grossly overstated and that there may in fact be a net increase in VMT due to induced tourist trips.

Footnote 20: <https://www.truebluela.com/2022/12/6/23316048/dodger-stadium-gondola-project-studyfrank-mccourt>

Footnote 21: <https://www.metro.net/about/l-a-metros-dodger-stadium-express-to-provide-free-servicefrom-union-station-and-harbor-gateway-transit-center-to-dodger-stadium-for-all-2022-homegames/>

Footnote 22: <https://www.metro.net/about/l-a-metros-dodger-stadium-express-to-provide-free-servicefrom-union-station-and-harbor-gateway-transit-center-to-dodger-stadium-for-all-2022-homegames/>

Footnote 23: If a fare is not being charged, the DEIR needs to explain how the system will be financially viable, so as to avoid physical impacts to the environment associated with a non-self-sustaining private transit system.

Response P700-47 Refer to Section 3.17, Transportation and Appendix N, Transportation Appendices, of the Draft EIR for detail regarding the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. As noted on page 3.17-26 and 3.17-27, as a transit project, quantitative VMT estimates are not required under CEQA as detailed in both guidance published by the Governor's Office of Planning and Research (OPR), and the City of Los Angeles Transportation Assessment Guidelines (TAG). Accordingly, the proposed Project's VMT analysis was provided for informational purposes and to evaluate whether the proposed Project would result

in a VMT reduction benefit. The analysis of VMT for the proposed Project employed a variety of data, methodologies, and models in order to estimate Project ridership, vehicle trips reduced, vehicle trip lengths, and ultimately the VMT benefit of the proposed Project.

The comment quotes CEQA Guidelines Section 15064.3(b)(4), wherein (and as restated in the comment) it states that “A lead agency has discretion to choose the most appropriate methodology to evaluate a project’s vehicle miles traveled ...,” “A lead agency may use models to estimate a project’s vehicle miles traveled and may revise these estimates to reflect professional judgment based on substantial evidence,” and “Any assumptions used to estimate vehicles miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project.” This is what was done in the preparation of VMT estimates for the proposed Project.

The methodology for estimating the VMT for the proposed Project is outlined in pages 3.17-26 through 3.17-30 and pages 3.17-34 through 3.17-38 of the Draft EIR. Additional information and assumptions regarding the ridership forecasting that feeds into the VMT analysis can be found in Appendix N of the Draft EIR. Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR.¹⁵ 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.

The commenter states that many of the proposed Project riders would be existing Dodger Stadium Express riders or people taking transit to Dodger Stadium. While many Dodger Stadium Express riders may choose to ride the proposed Project to take advantage of the much quicker travel time and frequent service, the average estimated ridership of the proposed Project (6,000 in 2026 and 10,000 in 2042) is greater than the average number of Dodger Stadium Express riders per game from LAUS (1,845¹⁶), so the majority of riders are expected to shift from other modes. The Dodger Stadium Express ridership statistics referred to by the commenter are inclusive of two-way travel (e.g., a passenger is counted once to the game and once after the game), whereas the referenced 2019 season average is to Dodger Stadium, as noted on page 3.17-27. Additionally, the Dodger Stadium Express operates during playoff games, so there were more than 81 days when the service operated, so the data referenced by the commenter aligns with the data used in the Draft EIR. In addition, while funding sources for Dodger Stadium Express are not known beyond

¹⁵ Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.

¹⁶ Los Angeles Dodgers. 2019. Dodger Stadium Express Rider Counts.

the 2023 season, the proposed Project would not preclude the continued operation of the Dodger Stadium Express, which would provide further transit capacity to Dodger Stadium. Despite the slower travel time, some riders may prefer to continue riding the service, such as riders who have fear of heights.

Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express 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. Appendix N of the Draft EIR includes detailed information regarding the ridership estimates for the proposed Project. As described in Appendix N, proposed Project ridership is expected to increase between 2026 and 2042 due to increased cost of time and driving, increased congestion, and the planned expansion of the regional transit network, which will make regional transit travel time more competitive with driving. It is a typical process for proposed transit projects to include both an opening year and a horizon year analysis, consistent with Federal Transit Administration (FTA) requirements and typical practice for Metro project environmental documents. In these documents, the horizon year ridership estimates are usually higher than the project opening year, reflecting population and employment growth in the region. Population growth both increases demand for transit, as well as makes fixed guideway transit more travel time competitive to driving as regional congestion serves as a capacity limitation for vehicle travel. Horizon year ridership estimates also account for the further buildout of the funded regional transportation network including transit projects in the project development pipeline.

The commenter referenced Dodger Stadium Express travel time noted in Yelp reviews. As described in page 4-63 of the Draft EIR, Metro provided data from the 2019 season for the Dodger Stadium Express travel time. The pre-game travel time from Union Station to Dodger Stadium ranged from approximately 14 minutes to 24 minutes, and the post-game travel time from Dodger Stadium to Union Station ranged from approximately 18 minutes to 49 minutes. These travel times do not include bus loading time and queue time.

The proposed Project would be free to ride for anyone with a ticket to a Dodgers game, consistent with the existing Dodger Stadium Express service. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation.

The commentor correctly notes that the proposed Project's VMT reduction is based on the mode of access and the distance traveled of the Dodger game attendees. As detailed in Appendix N, Ridership Model Development Memorandum, 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 described on page 3.17-28 of the Draft EIR average trip length data for Dodger Stadium were obtained via location based mobile device data for the 2019 season, with over 2 million data samples.

The main VMT reduction benefit of the proposed Project would come from travelers shifting from driving to Dodger Stadium to taking transit. The VMT change associated with some riders who park and ride rather than park at Dodger Stadium are factored into the analysis, but are minor in their effect given the proximity of the Union Station and Chinatown areas to Dodger Stadium. Additionally, the VMT benefit associated with existing Dodger Stadium Express ridership are already accounted for in the calculations of existing Dodger Stadium VMT. The Draft EIR estimates the proposed Project's net benefit from existing conditions. The shift of riders from Dodger Stadium Express to the proposed Project would not result in a change in Dodger Stadium VMT, and the EIR accurately does not assign any VMT benefit associated with this potential shift from one mode of transit to another.

As detailed in Appendix N, Transportation Appendices of the Draft EIR, tourism related ridership is estimated from an analysis prepared by HR&A, which determined the potential for the proposed Project to capture a share of the tourism attractions market in the County of Los Angeles. The HR&A Analysis of Potential LA ART Tourist Ridership is included in Appendix N. As explained on page 3.17-36 of the Draft EIR, tourist trips were not included in the VMT reduction estimate. HR&A Advisors is a highly regarded economic consulting firm with the experience and technical capabilities to be an authority on estimating tourism market capture. Their conclusion was that it is unlikely that tourists would travel to Downtown Los Angeles solely to ride the proposed Project. In their expert opinion, the proposed Project is assumed to capture a share of the existing tourism market destined for Downtown Los Angeles as an additional attraction to enjoy while visiting other sites and attractions, and is not expected to result in an increase in overall regional tourism. Therefore, the VMT generated by the proposed Project tourism was expected to be negligible and therefore is not necessary to include in the VMT estimate.

There are several reasons why neighborhood transit users may ride proposed Project. 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 LAUS. 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. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less. The VMT reduction associated with neighborhood transit users was assumed to be minor and was not included in the VMT reduction estimate for the proposed Project.

As described on page 3.17-36 of the Draft EIR, the VMT reduction benefits associated with tourism ridership, Los Angeles State Historic Park visitors and event attendees, and neighborhood transit users were not included in the VMT reduction estimate. Thus, the VMT reduction estimate would be considered conservative, as the proposed Project is likely to further reduce VMT beyond the level quantified in the EIR, not grossly overstated as suggested by the commentor.

Refer to 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 for a discussion of how the proposed Project solely proposes an aerial gondola system and was not improperly segmented or "piecemealed" from a larger development project at the Dodger Stadium property.

Comment P700-48 It also appears that the likely VMT reductions resulting from the Project are not enough to qualify the Project as an Environmental Leadership Transit Project (ELTP), and objection is also made to the characterization and special treatment of the Project as an ELTP. Given the likely significant overstatement of Project-induced VMT reductions, Greenhouse Gas (GHG) reduction estimates are also likely significantly overstated.²⁴ Furthermore, given the lack of a financial operating plan and representations that fares for ticket holders will be free, as discussed elsewhere in this comment letter, it is highly questionable whether the useful life of the system will extend to 2056, the year used to justify the Project's compliance with Pub. Res. Code Section 21168.6.9 as discussed on pages 1-4 to 1-9 of the DEIR. More likely the Project will become financially unsustainable long before then. Furthermore, as noted elsewhere in this comment letter, the Project is not included in the current RTP/SCS project list, and thus the Project is not consistent with the RTP

or many of its goals. Substantial evidence does not support the assertion that the Project as an ELTP. Both the VMT calculations and the GHG calculations in the EIR need to be redone in a recirculated DEIR to more accurately reflect the likely reality of Project use behavior, and must be supported by verifiable substantial evidence.

Footnote 24: Although the Project sponsor claims the Project will have zero emissions, and will make use of Green Power, the Project does not include a mitigation measure to that effect or any other legally binding method for ensuring the Project will use 100 percent Green Power over the entire life of the Project. In the absence of legally enforceable guarantees, GHG emissions reduction figures are likely further overstated.

Response P700-48 Refer to Section 1.0, Introduction, Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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. Refer to Topical Response A, SB 44, for discussion of the proposed Project's consistency with the requirements of Senate Bill (SB) 44. Refer to Appendix R, Senate Bill 44 (Public Resources Code Section 21168.6.9), of the Draft EIR, and Appendix E, Senate Bill 44 (Public Resources Code Section 21168.6.9), of the Final EIR. Refer to Topical Response A, SB 44, for discussion of how the proposed Project would reduce emissions by no less than 50,000 metric tons of greenhouse gas emissions directly in the Project's corridor as defined within the EIR over its useful life, and without using offsets. The lifetime emissions of the proposed Project over the useful life of the project would be a reduction of 166,653 MT CO₂e. The proposed Project's lifetime VMT reduction 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 SB 44. Refer to Section 1.0, Introduction, of the Draft EIR, pages 1-6 to 1-8, and Appendix N, Transportation Appendices, of the Draft EIR, for analysis of the proposed Project's consistency with each of the goals of the SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), or "Connect SoCal." The proposed Project is consistent with RTP/SCS, as 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, and would otherwise reduce greenhouse gas emissions by reducing VMT. Further, 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. The proposed Project's use of electricity supplied from LADWP's Green Power Program is a voluntary commitment 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. The addition of GHG-PDF-A has been incorporated into Section 5.0, Corrections and Additions, in this Final EIR. As discussed in Section 5.0, LADWP confirmed that its 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. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-49 B. Further Objections to the DEIR's VMT and GHG Reduction Claims, As Well As Its Failure To Address Caltrans Encroachment Requirements.

As described in DEIR Appendix N, due to the unique nature of the proposed Gondola Project, both the Metro ridership forecasting model and the City of Los Angeles travel demand model were inadequate to estimate ridership to Dodger Stadium because they are "regular weekday employment" models that exclude "special generators" like Dodger Stadium.

To attempt to remedy the inadequate forecasting and travel demand models, a consultant developed a "regression-based game-day ridership model" to estimate ridership to Dodger Stadium via the proposed Gondola Project. This Ridership Model is inadequate because it fails to validate and calibrate its data (highway speeds, travel times, and Gondola ridership) to ground truth.

Response P700-49 Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR for detail regarding the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. As described in Section 3.17, Transportation and Appendix N, Transportation Appendices of the Draft EIR, given the uniqueness of a gondola as a mode of transportation, a model specifically tailored to the events at Dodger Stadium was developed to estimate ridership of proposed Project. The ridership model is based on the statistical relationship between cost and travel time, using data from mode choice intercept surveys, transit access for a similar venue, and intercept survey of Dodger Stadium Express riders.

The ridership model was validated to Dodger Stadium mode of access data and Dodger Stadium Express average ridership, as detailed on page 9 of the Appendix N, Ridership Model Development memorandum.

Caltrans' Performance Measurement System (PeMS) data were analyzed to validate year over year changes to vehicular travel speeds to inform projection of future congestion factors, as described in Appendix N of the Draft EIR. However, PeMS data do not provide the full picture of travel time for trips to/from Dodger Stadium, as they only provide average freeway speed and volume data at the monitoring locations. To assess the full travel time (not just snapshot freeway speeds), the proposed Project's model includes travel time data for the entire length of trips to/from the origin/destination zip codes and Dodger Stadium as well as to/from the origin/destination zip codes and the Union Station area using ESRI's routable network data were used to calculate travel time from each zip code contained within the Dodgers ticket sales database provided for the analysis to the Union Station area, as well as to Dodger Stadium. An ESRI network dataset was created using Open Street Map (OSM) data as the base. OSM is an open-source data source that includes information such as roadway classification, speed limit, number of lanes, restricted access, and levels of congestion, which were used to calculate congested and non-congested existing travel times. Using this data, ESRI's network analyst tool estimated travel times, which included not only the freeway segments, but the complete length of the trip between the origin and destination zip code centroids.

Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR.¹⁷ 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.

Comment P700-50 1. Lack of Baseline Data Renders The DEIR Invalid.

Per LADOT's 2022 Transportation Assessment Guidelines, Page 2-21, "Caltrans Performance Measurement System (PeMS) data should be used to identify freeway operating speed(s) during the peak hour being analyzed. If reliable PeMS data are not available at the subject location, other sources of speed data including location-based services data from available sources could be used."

Appendix N - Transportation in the DEIR states: "Sampled speed data were not available for the SR-110 adjacent to Dodger Stadium." Yet Appendix N, Page 10, concludes: "The ridership model includes an assumed 10% increase in travel time for

¹⁷ Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.

2026, and a 25% increase in travel time for 2042 conditions relative to 2019 conditions. Based on the freeway speed trends, assuming trends hold, these assumptions are reasonable.”

To decide whether a given project’s environmental effects are likely to be significant, an agency must use some measure of the environment’s state absent the project, a measure sometimes referred to as the baseline for environmental analysis. The baseline normally consists of the physical environmental conditions in the vicinity of the project, as they exist at the time environmental analysis is commenced. Guidelines § 15125; North County Advocates v. City of Carlsbad (2015) 241 Cal.App.4th 94, 96.

Here, the DEIR fails as an informational document because there is no baseline travel time speeds provided for the Project vicinity because there is no PeMS speed data available (or obtained and then provided to the public as part of the DEIR) for SR-110 near Dodger Stadium. As such, the base year travel time speeds cannot be validated, making any assumptions for future travel times conjectural and flawed. The DEIR could easily and should have validated travel time speeds near Dodger Stadium to ensure reasonable model calibration. The DEIR should be recirculated to include this foundational baseline information.

Response P700-50 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations and the Draft EIR. Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR for detail regarding the proposed Project’s ridership model which is based on extensive data sources and assumptions validated by data. Refer to Response P700-49 and page 4 of the Ridership Model Development Memorandum in Appendix N, Transportation Appendices, of the Draft EIR for a discussion of how ESRI’s routable network was used to calculate travel time from each zip code contained within the Dodgers ticket sales database. PeMS data cannot be used for the purpose of calculating travel time for the full length of a trip, as PeMS provides travel speed and volume data only on freeway segments where Caltrans has monitoring loops. These speed data represent a snapshot in time at a particular location, not the full travel time from origin to destination. As noted on page 10 of the Appendix N, Ridership Model Development memorandum, PeMS data were available and used in the analysis on the I-5, US-101, I-110, I-10 and SR-60 freeways, which are all used in regional access to Dodger Stadium. The PeMS data detailed in Appendix N represent the best available data on freeways adjacent to Dodger Stadium. While the PeMS data were not available for the SR-110 freeway to use in the analysis, the data available through the PeMS system for all of the other freeway facilities noted above are more than adequate to estimate year over year trends in the decline in travel speeds on regional facilities to inform the future congestion factor used in the ridership model. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-51 **2. The DEIR's Transit Mode of Access Analysis is Flawed.**

Similarly, the Gondola Project transit access model analysis of proposed ridership is flawed for lack of validation and calibration. Appendix N, Page 8, states: "The existing model was then calibrated to existing conditions for the share of Dodger Stadium Express (DSE) riders that take transit to LA Union Station based on data prepared by Metro in reports to the South Coast Air Quality Management District (SCAQMD) for the 2011-2015 Dodger seasons."

Additionally, the transit access model utilized 2014 Dodger Stadium Express intercept survey data to calculate mode of access to Dodger Stadium. The consultants used the same percentages as 2014, which "indicated that 88% of riders arrived via transit, walking, or biking."

Again, these data have not been validated, but are used to calibrate the transit access model. However, 2014 survey data are not an adequate representation of existing mode access to support future forecasts of the proposed Gondola Project's ridership, which makes future access mode data flawed. The DEIR could and should have validated mode access data to existing conditions to ensure reasonable model calibration. The DEIR should be recirculated to include this foundational information.

Response P700-51 Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR for detail regarding the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. As noted in Appendix N, the mode of access model was based on the 2014 Dodger Stadium Express intercept survey data because it offered a substantially higher number of samples compared with the data from other Metro reports to SCAQMD, and represented one of the more conservative (e.g., higher auto mode of access) data of the intercept surveys. The mode of access data used in the forecast were 71% transit and 3% walk/bike. This non-auto mode of access data from the intercept survey and the data from the 2011-2015 SCAQMD reports are within the same range from 74% to 91.4%, which suggests that the 2014 data is reasonable to incorporate as an assumption in the mode of access model. Additionally, as further detailed in Response P700-52, an additional 20% of ridership beyond the model estimates was assumed to capture the riders expected to ride the proposed Project based on its unique customer experience. These riders were assumed to have a 35% non-auto mode of access. Combining these mode of access assumptions in proportion to the estimated ridership results in a total non-auto mode of access for the proposed Project of 67.5%, as detailed in Appendix N.

Additionally, for a more conservative analysis, the decision was made to hold the mode of access data obtained from intercept surveys in 2014 and not further adjust mode of access nor to take data that indicate a higher transit mode of access on Dodger Stadium Express, even though the regional transit network provides

substantially more high-quality transit service than was available to Dodger Stadium Express riders in 2014.

The quote from Appendix N in the comment states that the model was calibrated to existing conditions of the Dodger Stadium Express, so it is unclear why the commenter is also stating that the analysis is flawed due to a lack of calibration and validation.

Comment P700-52 3. The “Customer Experience” Factor is Flawed.

Appendix N, Page 12, states: “There is no available data source to quantitatively estimate how this user experience alone will impact ridership, but it is believed that actual ridership could ultimately exceed the model estimates due to the unique experience of the system. An assumed factor of 20% was applied on top of the model estimates to reflect this potential to capture riders associated with the proposed Project’s customer experience.”

Nonetheless, the consultant “assumed mode of access for these riders is 65% vehicle mode of access, and 35% transit/walk/bike.” Here, there is no dispute these data are not validated or calibrated because the document explicitly states there is no data available, but adds “assumed” factors without any surveys or other data collection. Thus, any VMT or GHG reduction benefits should not be included in the DEIR. The DEIR should be recirculated to remove any alleged VMT or GHG reduction benefits based on this “customer experience factor.”

Response P700-52 Refer to Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR for detail regarding the proposed Project’s ridership model which is based on extensive data sources and assumptions validated by data. The 20% customer experience factor was based on the professional judgment of the preparers of the ridership forecast. As the proposed Project would be a unique transportation option in Los Angeles County, it is reasonable to assume that some riders would choose to ride the system for more than just the travel time and travel cost savings. As stated in Appendix N, and detailed in the Response P700-51, the mode of access of choice riders was conservatively assumed to be 35% non-vehicle mode of access, and 65% vehicle mode of access to account for the likelihood of choice riders to prefer driving overtaking transit to connect to the proposed Project. Reflecting the full mode of access for the proposed Project, including these choice riders, the mode of access is 67.5% non-vehicle, and 32.5% vehicle mode of access, substantially lower than any of the existing mode of access data for Dodger Stadium Express. While vehicle access and parking are not required to be analyzed under CEQA, and while it is unlikely that vehicle mode of access would be this high for this rider segment, this conservative vehicle mode of access was used to ensure that the evaluation of vehicle and parking access and its potential to affect intersection operations are evaluated in a worst-case manner in the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*. Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and

Appendix N, Transportation Appendices of the Draft EIR.¹⁸ 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. As discussed on page 3.17-34 and shown in Table 3.17-4 in Section 3.17, 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 of the Draft EIR.¹⁹ These ridership estimates are inclusive of the customer experience factor. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines Section 15088.5.

Comment P700-53 4. The Los Angeles State Historic Park Rider Estimate Methodology Is Questionable.

As above, “No data are available for mode share of attendees travelling to events at the Park.” But in this instance the consultants do not make any “assumed” factors, but do acknowledge, “because quantitative data to further refine this estimate was not readily available, Fehr & Peers conservatively did not include in the Transportation Section of this EIR the VMT reduction benefit of the proposed Project for this ridership market segment.” Please confirm no VMT or GHG reduction benefits are attributed based on mode share of attendees to the State Historic Park.

Response P700-53 Refer to Section 3.17, Transportation and Appendix N, Transportation Appendices of the Draft EIR for detail regarding the proposed Project’s ridership model which is based on extensive data sources and assumptions validated by data. No VMT or GHG reduction benefits were attributed based on mode share of attendees to the Los Angeles State Historic Park as quoted in the comment and as stated on page 3.17-36 in Section 3.17, Transportation, of the Draft EIR. When events occur at the Los Angeles State Historic Park, the Metro L Line (Gold) is used by attendees, and as detailed in Appendix N, the Los Angeles State Historic Park hosts major events, with substantial attendance. While no existing mode choice data are available for attendees, the proposed Project would provide substantial additional transit capacity to the Los Angeles State Historic Park that would augment the capacity provided by the Metro L Line (Gold), which can further to increase the number of event attendees who can transit compared with existing conditions. However, even though Los Angeles State Historic Park ridership is projected to occur on the proposed Project, no VMT or GHG

¹⁸ Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.

¹⁹ 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.

reduction benefit were attributed to this market segment to ensure a conservative assessment.

Comment P700-54 5. The Vehicle Miles Traveled (VMT) Analysis Is Further Flawed.

The DEIR at 3.17-26 states: “the proposed Project would not increase vehicle capacity as it is a mode of transit. The proposed Project, as detailed in this section, would reduce VMT. Thus, no VMT analysis is required, and the associated impact is therefore less than significant.” However, the Project sponsor is LA Aerial Rapid Transit Technologies, LLC (page 1-1), not a public transit agency. Furthermore, “gondolas” are not a mode listed as exempt under SB 743.

This is confirmed on page 3.17-27. “Transit and active transportation projects generally reduce VMT and therefore are presumed to cause a less-than-significant impact on transportation. This presumption may apply to all passenger rail projects, bus and bus rapid transit projects, and bicycle and pedestrian infrastructure projects.” Thus, it is not demonstrated that the Project is exempt from a VMT, in light of the fact that “gondolas” are not mentioned.

As a matter of precaution, the Project applicants point out that “while not required, the VMT reduction benefit of the proposed Project was quantified for informational purposes.” Interestingly, the purported VMT reduction benefits rely exclusively on Dodger games, which equate to eighty-one (81) regular season games, which is only twenty-two percent (22%) of the days of the year.

As detailed above, because the Gondola’s Ridership Model is flawed by not being appropriately validated and calibrated, the Estimated Daily VMT – with Proposed Project (Table 3.17-5) numbers are inaccurate. This is further supported by the October 24, 2022 UCLA Mobility Lab Study (https://uploadssl.webflow.com/61c3996ce146bfa8fc27adeb/635c2657c071e02577a5c5a0_Report%20on%20UCLA%20study%20of%20gondola%20traffic%20impact%20102522%20.pdf)

which concluded:

“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 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.”

Therefore, the DEIR's analysis of the project's environmental impacts are inadequate. The Gondola's Ridership Model must be validated and calibrated to ensure accurate VMT and GHG results.

Response P700-54 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. As noted on page 3.17-26 and 3.17-27, as a transit project, quantitative VMT estimates are not required under CEQA as detailed in both guidance published by the Governor's Office of Planning and Research (OPR), and the City of Los Angeles Transportation Assessment Guidelines (TAG). Nevertheless, Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR included a VMT analysis of the proposed Project, which was provided for informational purposes. The Project Sponsor does not change the fact that the proposed Project is a zero-emissions fixed guideway high frequency transit project that could carry up to 5,000 passengers per hour per direction and would not be reliant on automobiles thereby reducing VMT. Nothing in SB 743, or the guidelines for its implementation, suggest that a transit project must be sponsored by a public agency for the exemption to apply. Nor do they indicate that the transit exemption only applies to specific types of transit projects. As discussed on page 3.17-27, in Section 3.17, Transportation, of the Draft EIR, the Governor's Office of Planning and Research's *Technical Advisory on Evaluating Transportation Impacts in CEQA* indicates that, in general, transit and active transportation projects reduce VMT and therefore are presumed to cause a less than significant impact on transportation. As further described on page 23 of the *Technical Advisory on Evaluating Transportation Impacts in CEQA*, the transit exemption aligns with the statutory goals contained in SB 743 by reducing GHG emissions, increasing multi-modal transportation networks, and facilitating mixed use development. The proposed Project is a transit project and like the examples named in the technical advisory, would align with SB 743's goals. As discussed in Section 3.8, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR, the proposed Project has the potential to reduce GHG emissions and would increase multi-modal access to and from stations with pedestrian network improvements and would improve the bike circulation system by carrying cyclists over key barriers. While comparable aerial transit systems are operated in cities around the world, it is not such a common form of public transit that the Governor's Office of Planning and Research and the Los Angeles Department of Transportation would have specified it by name in their VMT screening criteria. But this does not change the fact that the proposed Project is a transit project and therefore is presumed to cause a less than significant impact on transportation under SB 743.

The VMT analysis was conducted for both daily (daily weekday and daily weekend) VMT and annual VMT, as shown in Tables 3.17-4 and 3.17-5 of the Draft EIR,

respectively. The annual VMT represents the VMT reduction benefit across a whole year, associated with Dodger Game Days. As described in pages 3.17-34 through 3.17-36 of the Draft EIR, the tourism ridership, the Los Angeles State Historic Park visitors and event attendees, and neighborhood transit users were not quantified in the annual VMT reduction calculation in order to ensure a conservative analysis. Additionally, the model inputs and assumptions that were used to estimate ridership for games and events at Dodger Stadium were conservative as well. Including the additional market segments that were not included in the quantitative VMT analysis users in the annual VMT analysis would have resulted in a greater VMT reduction than reported in the Draft EIR.

The Draft EIR does not state or include analysis resulting in 3,000 cars would be removed from the streets. The Draft EIR does not analyze cars removed as it is not a transportation-related metric under CEQA Appendix G or under the City of Los Angeles Transportation Assessment Guidelines.

Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. 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:

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

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.

Comment P700-55 6. The DEIR's Greenhouse Gas (GHG) Conclusions Are Invalid.

Analysis of GHG emissions is essential under CEQA. Therefore, even seemingly small additions of GHG emissions into the atmosphere must be considered cumulatively considerable. The DEIR concludes that the Project would result in less-than-significant

impacts related to GHG emissions. However, as detailed above, the DEIR presents an incomplete analysis of the Project, which results in a flawed GHG analysis.

Appendix N-6, provides: “4.13 Parking and Land Use Management: This policy states that excessive parking can incentivize undesirable behavior or result in large areas of vacant land that make it harder to reach destinations without a vehicle. The Project will not provide any dedicated vehicle parking. The proposed Project would utilize existing off-street parking facilities with available capacity as identified in a future parking management plan, which would also identify strategies for the City of Los Angeles to implement to minimize riders of the proposed Project parking in undesirable locations.”

Since there is parking near the Gondola stop at Union Station, the Project does not provide any additional parking. Yet it is presumed that Gondola riders will use the over 10,000 spaces in publicly available lots and garages and in on-street spaces in order to be able to ride the Gondola. The environmental analysis is silent as to the incentivizing of people to drive to the Gondola to avoid parking at Dodger Stadium, which would increase VMT and GHG emissions.

The DEIR’s traffic and GHG analyses are flawed on multiple grounds, including lack of substantial (or any) evidence to support various critical assumptions and conclusions. The DEIR should be corrected and recirculated to address each of these flaws and omissions.

Response P700-55 Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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. 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, and the ridership forecasts of the proposed Project, approximately 20 percent of the fans could take aerial transit connected to Metro’s regional transit system. This would reduce traffic volumes destined to 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. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines (“TAG”). Nevertheless, the 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. Refer also to the proposed Project’s Preliminary Parking Management Implementation Plan.²⁰ As noted on page 12 and 13 of the Ridership Model Development Memo, in Appendix N, Transportation Appendices, of the Draft EIR, parking costs are key data elements that are used in the ridership model. The likelihood of an individual to ride transit is a balance of the overall travel time compared with driving and the overall travel cost of driving. The presence of over 10,000 parking spaces in the areas around the Alameda Station and Chinatown/State Park Station exists today. If the majority of Dodger Stadium attendees were looking to avoid paying to park at Dodger Stadium, they would have that option today. Also, as detailed on page 28 of the Appendix N PDF, in the table entitled *LA ART MODE OF ACCESS DATA CONSIDERED AND ESTIMATED FUTURE MODE OF ACCESS*, only 8.6% to 26% of Dodger Stadium Express riders take a vehicle (park and ride or TNC) to access the Dodger Stadium Express. In contrast, for a conservative analysis of parking demand, 27.6% of riders are estimated to park and ride. For most game attendees, the potential to save money on parking costs by taking the proposed Project is not enough of an incentive to make a change to their mode of travel such that a massive redistribution of parking locations suggested by the commenter would occur. It should be noted that Dodger Stadium has thousands of parking spaces, which will always be the closest parking locations to the Stadium, which are already considered in the existing environmental setting.

As discussed in Appendix N, the proposed Project’s ridership model considered mode of access in its transit access model, analyzing proposed Project ridership that would come from riders parking within a ½-mile walking distance of either station, or from vehicle drop-offs at either station from a service such as Uber or Lyft. The model also takes into account parking, analyzing proposed Project ridership that would come from riders parking at Union Station, or other parking locations in Downtown Los Angeles, or from vehicle drop-off at Union Station, such as Uber or Lyft. This ridership model was used to calculate total VMT for the proposed Project. In turn, Section 4.4.5 of Appendix J, Greenhouse Gas Emissions Technical Report, recognized that GHG emissions associated with total VMT were calculated using the annual VMT as provided by Fehr & Peers, the authors of Appendix N. As such, the GHG analysis for

²⁰ Fehr & Peers. 2023. Los Angeles Aerial Rapid Transit Project, Parking Management Implementation Plan.

mobile source emissions inherently considered the potential for riders to park elsewhere in Downtown Los Angeles and ride the gondola to Dodger Stadium.

This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-56 7. Ridership Queueing After Dodger Games Is Inadequately Analyzed.

Appendix N, Page 20, indicates: “It is estimated that 6,000 game attendees (12,000 trips for round-trip) would ride the proposed Project in 2026 and 10,000 game attendees (20,000 trips for round-trip) would ride the proposed Project in 2042 per game, reaching the estimated capacity of the system.”

Additionally, “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.” (DEIR, Page 2-42)

Based on this information, it can be estimated that a cabin on the Gondola cable every 200 ft,²⁵ travelling a speed of 13.4 mph would have the following queuing time:

a) 6,000 game day riders in 2026 (1hr 12 minutes)

b) 10,000 game day riders in 2042 (2 hours)

The DEIR does not address the post-game queueing for Gondola rides. Waiting one hour and twelve minutes (2026) to catch a Gondola ride after a night Dodger game is unrealistic. Waiting two hours (2042) to get on the Gondola is even more unrealistic. As such, it is disingenuous to state any VMT or GHG benefits from increasing ridership because those numbers are not realistic or justified. Please confirm no VMT or GHG reduction benefits are attributed based on inflated and erroneous ridership postgame numbers.

Footnote 25: It is anticipated that the proposed Project operations would vary the number of cabins in service and speed throughout the day, based on demand. (DEIR Page 2-42.)

Response P700-56 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project’s ridership model which is based on extensive data sources and assumptions validated by data, and the management of queueing at stations, and pre-game and post-game transportation. Post-game queues at Dodger Stadium were estimated based on assumptions about the departure patterns and estimates of walk times from the various seating areas within the stadium. Those seated the furthest away from the Dodger Stadium Station would take more time to arrive at the Station, much like how it is currently for passengers riding the Dodger Stadium Express. In addition, 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. The post-game/event queue for the proposed Project would be constantly moving as cabins would depart every 23 seconds, in contrast to the existing Dodger Stadium Express, which has much longer gaps in bus departures (from 3 to 19 minutes spacing between bus departures based on 2023 season observations further described below). The comment incorrectly uses “queue” to refer to the total service time needed to transport riders from Dodger Stadium post-game. Actual riders would be waiting in the queue for shorter time periods.

In order to quantify the existing service time needed to transport Dodger Stadium Express riders, four post-game time periods were observed 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

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.

Topical Response B also discusses 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. 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. Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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.

Comment P700-57 8. The DEIR Is Flawed And Incomplete For Failing To Disclose And Address Caltrans Encroachment Permit Issues and Requirements.

The DEIR is silent and ignores any direct or indirect impacts (visual, safety, traffic, construction traffic management, etc.) from Gondolas crossing over SR-110 near Dodger Stadium. As a result, the DEIR also ignores disclosing and analyzing any potential mitigation measures that must be implemented. This crucial final segment of the proposed Gondola system connecting to Dodger Stadium must be analyzed and evaluated for impacts. The DEIR seems to assume that Caltrans will simply provide an encroachment.

In general, Caltrans must identify and keep the highways free of encroachments. Jamison v. Dept. of Transportation (2016) 4 Cal⁴pp.5th 356, 363. An "encroachment" includes "any tower, pole, pole line . . . or any structure . . . which is in, under, or over any portion of the highway." (Sts. & Hy. Code § 660.) The California Legislature has determined that Caltrans' obligations to care for and protect the state highways "shall apply to all private corporations authorized by law to establish or maintain any works or facilities in, under or over any public highway." (Sts. & Hy. Code § 661.)

Any encroachment permits issued by Caltrans "may provide such other conditions as to the location and the manner in which the work is to be done as the department finds necessary for the protection of the highway." (Sts. & Hy. Code § 672; see also La Canada Flintridge Dev. Corp. v. Dept. of Transportation (1985) 166 Cal.App.3d 206, 213-215.)

It simply is not adequate for the DEIR to defer consideration of potential impacts to the state highway and its traveling public for consideration at the traffic encroachment stage because "Caltrans requires that an approved environmental document accompany the 'Standard Encroachment Permit Application' (form TR-0100). All required documentation, including environmental, must accompany the encroachment permit application before Caltrans deems the application complete." (Caltrans 2018 Encroachment Permits Manual, Pages 4-1 and 4-2; <https://dot.ca.gov/programs/traffic-operations/ep/ep-manual>)

Additionally, “No new information can be required from an applicant once the application form with its accompanying documentation has been accepted as complete. However, the applicant can be asked to clarify, correct, or otherwise supplement the information submitted.” (*Id.*)

Therefore, the DEIR does not address potential impacts, nor mitigation, within Caltrans’ right-of-way with regard to the Gondolas traveling over SR-110. Evaluating potential impacts and mitigation after completion of the DEIR is inadequate and a failure to proceed in the manner required by law. The DEIR should be corrected and recirculated to address each of these flaws and omissions.

Response P700-57 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Section 2.10, Required Permits and Approvals, of the Draft EIR, listing approvals from Caltrans through an encroachment permit and/or other agreement, form of permission, or approval(s) to access, construct, and/or operate the proposed Project within or over the State transportation system right-of-way, including the SR-110. The EIR is intended to provide the environmental clearance for this approval, and analyzed the construction and operational impacts of the proposed Project crossing the SR-110. For example, Section 3.01, Aesthetics, of the Draft EIR, analyzed views from the SR-110, noting that “cables and cabins” would “be visible to motorists” on the SR-110, but “would not damage any scenic resources.” The necessary applications will be submitted at the time the proposed Project is before Caltrans for consideration of the applicable discretionary approvals required for implementation of the proposed Project. It is premature to provide such applications prior to the lead agency’s certification of the proposed Project’s EIR. Consistent with CEQA Guidelines Section 15096(a) and Public Resources Code sections 21104, 21153(c), and 21069, Caltrans, as a responsible agency, will rely on the information in the EIR to consider the aspects of the proposed Project within its jurisdiction. Pursuant to its role as a responsible agency under Public Resources Code Section 21153(c), Caltrans submitted a comment letter on the Draft EIR explicitly stating that “reviews, approvals, and encroachment permits will be conducted at the time of permit application so that all concerns can be adequately addressed.”

Refer to 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, for discussion of Metro’s consultation with CEQA responsible agencies.

Refer to Appendix A, Scoping Report, of the Draft EIR, and Appendix A, Public Outreach Report, of the Final EIR, for documentation of notice to responsible agencies at various stages in the environmental review process. Metro has complied, and will continue to comply, with the CEQA requirements for consultation with responsible agencies at each stage of the environmental review process. This consultation process has included meetings with Metro and the responsible agencies to discuss the scope of environmental review, and Caltrans has engaged in this

consultation process to ensure that the EIR included the information necessary for Caltrans to consider the aspects of the proposed Project within its jurisdiction. Because the EIR need not provide the encroachment permit application at this juncture, this comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-58 C. The DEIR Does Not Evaluate or Specifically Mitigate the Impact of Project Construction on Biking.

There is one impact that the DEIR has treated only nominally. Guidelines Section 15064.3(a) provides that “[g]enerally, vehicle miles traveled is the most appropriate measure of transportation impacts. However, it also provides that “[o]ther relevant considerations may include the effects of the project on transit and non-motorized travel.” (Emphasis added.) The most common forms of non-motorized travel are walking and biking. Here, the DEIR does not analyze or effectively mitigate the potential impacts of construction of the Gondola Project on the proposed Esplanade bike path that is planned as part of Metro’s LAUS Forecourt and Esplanade Improvements. (DEIR, p. 3.9-32.)

The DEIR identifies the points during construction when the Esplanade bike path would be closed (DEIR, pp. 3.17-35 to 3.17-36 [30 weeks full and partial closures]), and other points when bicycle traffic would be “controlled.” (DEIR, p. 3.9-33, 3.11-24, 3.17-46.) No description of the nature or level of “control” is given. There is no analysis of the impact on use of the bike path during these closures and “control” periods, and no mitigation is offered except for bikers to use a pedestrian detour (DEIR, p. 3.9-36), which has a potential impact on safety to both. The DEIR should be recirculated to provide a full analysis of the effects of Project construction on bicycle transportation, especially on the planned Esplanade bike path.

Response P700-58 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Section 2.0, Project Description, of the Draft EIR, for a discussion of how Alameda Station is compatible with Metro’s plans at LAUS, including the planned LAUS Forecourt and Esplanade Improvements Project. Refer to Section 3.17, Transportation and Appendix B, Construction Assumptions, of the Draft EIR for details regarding pedestrian and bicycle detours during construction. “Control” means that flag people would hold pedestrians and bicyclists on the Esplanade bike path during temporary movements, such as crane movements. Pedestrian and bicycle traffic control would depend on the specific detours determined in the proposed Project’s Construction Traffic Management Plan (CTMP) required by Mitigation Measure TRA-B, and which is subject to review and approval by the Los Angeles Department of Transportation. With implementation of Mitigation Measure TRA-B, impacts would be less than significant. Further, pedestrian and bicycle access will largely be maintained, or otherwise be slightly detoured, during certain phases of construction, as discussed in Section 3.17 of the Draft EIR.

Providing for both pedestrians and bicycles on the same detour is appropriate as both would be accommodated on the shared Union Station Esplanade, and bicycles may legally be ridden on sidewalks on the City of Los Angeles. Appropriate signage would be displayed, which will be outlined in the CTMP. This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-59 D. Mitigation for the Significant Hazard of Drivers Striking Pedestrians Because Project Features Obscure Their View Is Ineffective, Lacks Performance Standards, and Places Responsibility for Mitigation on Drivers, Not the Project.

Because the stations and hugely tall towers require so much ground space for their foundations and structures, the proposed Project will create visual blockages that prevent drivers of cars and trucks from seeing pedestrians at various points. Among these points of blocked visibility are the Alameda Tower and the Chinatown/State Historic Park Station. (DEIR, p. ES-72.)

The DEIR proposes mitigation for this significant impact, denominating such mitigation as “visibility enhancement . . . sufficient to alert drivers to the presence of pedestrians.” (Id.) The DEIR makes it plain that the size and location of the stations themselves will not be changed to protect pedestrians, but that mitigation will be provided to help drivers become aware of pedestrians, with the responsibility for avoiding the pedestrians then resting upon the drivers. The existing roadways and traffic flow, we are told, must adapt to ensure that Gondola construction and operation do not cause pedestrian injuries or fatalities, rather than the size or location of Gondola facilities adapting.

The DEIR proposes Mitigation Measure TRA A to carry out this “visibility enhancement.” (DEIR, p. 3.17-67.) As previously noted, this mitigation measure is an example of improper deferral of mitigation. Like the mitigation discussed above, this measure does not meet the requirements of Guidelines Section 15126.4(a)(1)(B), in that it is deferred without Metro specifying definite performance standards, and Guidelines Section 15126(a)(2), in that no specific measure is “fully enforceable through permit conditions, agreements, or other legally binding instruments.” Instead, the DEIR provides a laundry list of possible visibility enhancements, including “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.” (DEIR, p. 3.17-67.) However, no performance standards for TRA A are given other than approval by the City of Los Angeles Department of Transportation (LADOT). (Id.) The mitigation is deferred in that it must only be completed prior to operation of the Gondola. (Id.)

Where specific mitigation measures are required, their efficacy rests on the assumption of full compliance by motorists with all traffic laws. For example, the DEIR

assumes that a visibility hazard at the Alameda Tower will be fully mitigated by banning right turns on a red light there (DEIR, p. 3.17-41); however, common experience shows that Los Angeles drivers do not always obey such restrictions. Similarly, a potential hazard at the Broadway Junction is dismissed by the DEIR on grounds that, if drivers obey the speed limit, they will see the traffic signal at issue in time to stop, thereby avoiding any pedestrian collisions. (DEIR, p. 3.17-42 to 3.18-43.) Again, common experience shows that Los Angeles drivers do not always obey speed limits, and there is no substantial evidence that they will always do so at the Broadway Junction.

The DEIR assigns responsibility for avoiding the pedestrian hazards the proposed Project will create to drivers, rather than requiring the incorporation into the Project design of physical mitigation measures that will prevent the hazards without assuming perfect compliance by all drivers with traffic laws. CEQA, on the other hand, assigns the responsibility for mitigating all significant impacts to the project proponent, a responsibility Metro has not carried here. There is a lack of substantial evidence that TRA A will successfully mitigate Project hazards.

Response P700-59 Refer to Section 3.17, Transportation, of the Draft EIR, for discussion of whether the proposed Project would substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Mitigation Measure TRA-A includes visibility enhancement features to reduce impacts at the Alameda Tower and Chinatown/State Park Station.

Mitigation Measure TRA-A was originally written to permit flexibility in the ultimate measures to be taken prior to further development of the proposed Project design. However, the necessary mitigation at each location was further identified and is discussed in the Draft EIR on pages 3.17-41 and 3.17-42 in Section 3.17, Transportation. As stated on page 3.17-41, the specific mitigation at the Alameda Tower is prohibiting right turns on red from westbound Alhambra Avenue to northbound Alameda Street. In response to comments 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. Refer to Section 5.0, Corrections and Additions, of this Final EIR, for revisions to Mitigation Measure-TRA-A, identifying visibility enhancements the proposed Project would design during construction and complete prior to proposed Project operations at Alameda Tower and Chinatown/State Park Station. This would alleviate potential visibility issues associated with operation of the Alameda Tower by prohibiting vehicles from making a westbound right turn on red. This Mitigation Measure is not intended to mitigate for potential vehicle and pedestrian conflict; rather, it is recommended to alleviate potential visibility issues for vehicles traveling northbound on Alameda Street. No right turn on red restrictions are commonly used at locations with potential visibility issues. As stated on page 3.17-42, in Section 3.17,

Transportation of the Draft EIR, the specific suggested action at the Chinatown/State Park Station is channelization of pedestrians to the crosswalk where visibility is sufficient. In response to comments, TRA-PDF-A has been added to the Final EIR in Sections 5.0, Corrections and Additions, as a best practice to further enhance pedestrian visibility at the Chinatown/State Park Station. As described in TRA-PDF-A, the proposed Project would stripe a high visibility crosswalk and add upgraded lighting for the driveway crossing south of the Los Angeles State Historic Park.

As detailed on pages 3.17-40 to 3.17-41 and 3.17-42 to 3.17-43 of the Draft EIR, no visibility impact would result from operation of the Alameda Station and Broadway Junction, respectively. Both the *A Policy on Geometric Design of Highways and Streets* by AASHTO²¹ and the *Highway Design Manual* by Caltrans²² explain that design speed is dependent on the characteristics of the roadway and the context of the surrounding area. Table 101.2, Vehicular Design Speed, in Caltrans' *Highway Design Manual* provides that design speeds for urban arterials that are main streets in regional/community centers shall be between 30 and 40 miles per hour (mph) and that design speeds for urban arterials in downtowns and city centers shall be 30 mph (note that Caltrans' use of the word "shall" makes the guidance in Table 101.2 mandatory). AASHTO states that urban arterial streets should be designed to permit running speeds of 20 to 45 mph, with speeds in the lower portion of this range applicable to local and collector streets and to arterial streets through more crowded business areas while speeds in the high portion of the range apply to high-type arterials in outlying suburban areas. The context of the streets in the Union Station and Chinatown areas in the vicinity of the proposed Project's proposed Alameda Station is urban downtown/regional center business area. Both suggest that use of 35 mph to determine stopping distance is appropriate as it is within the range mandated by Caltrans for urban regional/community centers, higher than the Caltrans guidance for urban arterials in downtowns and city centers, and on the higher side of the range suggested by AASHTO for urban arterial streets. The design speed used to calculate the stopping sight distance for the Broadway Junction meet engineering requirements and follow standard practices.

Comment P700-60 Finally, TRA A flouts CEQA's basic requirement of full public disclosure. (Pub. Res. Code § 21061; Guidelines § 15003(c) and (d).) The DEIR does not fully disclose what mitigation measures will be required at which location, nor is the process of approval of these measures by LADOT ensured to be open to public scrutiny and comment; the reverse is likely.

Response P700-60 Refer to Response P700-59 above regarding the specificity of mitigation measures at each location and revisions to Mitigation Measure TRA-A. The approval of the measures by LADOT is standard practice and the process outlined in the Draft EIR is

²¹ American Association of State Highway and Transportation Officials (AASHTO). 2018. *A Policy on Geometric Design of Highways and Streets*. Available at: <https://store.transportation.org/Common/DownloadContentFiles?id=1776>. Accessed August 2023.

²² California Department of Transportation (Caltrans). 2020. *Highway Design Manual*, 7th Edition. Available at: <https://dot.ca.gov/programs/design/manual-highway-design-manual-hdm>. Accessed August 2023.

in concert with the manner in which mitigation measures are determined for projects in the City of Los Angeles. As demonstrated in Section 7.0, Mitigation Monitoring, and Table 6-1, Mitigation Monitoring and Reporting Program (MMRP), of the Final EIR, the Mitigation Monitoring and Reporting Program will prescribe for agency enforcement of mitigation measures for the proposed Project, including Mitigation Measure TRA-A, which will ensure supervision by the various responsible agencies. The MMRP designates which agencies are responsible for future enforcement of mitigation measures, based on the agency with the regulatory authority to enforce a given mitigation measure.

Comment P700-61 As a result, the DEIR violates CEQA on these additional grounds. Because hazard impacts are not fully mitigated, hazard impacts must be identified as significant in the DEIR and the DEIR recirculated for public review and comment.

Response P700-61 Refer to Responses P700-59, and P700-60 for how implementation of Mitigation Measure TRA-A would result in less than significant impacts to hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5. No new significant environmental impact would result from the proposed Project.

Comment P700-62 **XII. THE DEIR FURTHER VIOLATES CEQA BY FAILING TO PROPERLY OR FAIRLY PRESENT AND ANALYZE ALTERNATIVES.**

As our Supreme Court has repeatedly held, the “EIR is the heart of CEQA, and the mitigation and alternatives discussion forms the core of the EIR.” In re Bay-Delta cases (2008) 43 Cal.4th 1143, 1162. Here, the DEIR further fails because it did not consider a reasonable range of alternatives, as required by CEQA.

In Public Resources Code Section 21002, CEQA forbids approval of projects with significant environmental impacts “if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects.” Section 15126.6(a) of the Guidelines mandates that agencies may not artificially constrict their consideration of alternatives. They must consider alternatives that can “attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project.”

The importance of the consideration of alternatives to the proposed project was emphasized by our Supreme Court in Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 564, which held that “[t]he core of the EIR is the mitigation and alternatives section.” (Emphasis added.) The Guidelines prescribe that a “reasonable range” of alternatives must be considered, “even if those alternatives would impede to some degree that attainment of the project objectives or would be more costly.”

Guidelines § 15126.6(b). Both the “no project” alternative and any alternatives rejected during the DEIR development must be examined.

Response P700-62 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR’s consideration of a range of reasonable alternatives, including the no project alternative and those considered but dismissed, pursuant to CEQA. Refer to Response P700-63 for discussion of the alternatives analyzed in the Draft EIR.

Comment P700-63 A. The DEIR Presents False Alternatives And Biased Project Objectives That Artificially Favor the Gondola.

Here, the Alternatives section fails in two ways. First, it fails to propose a reasonable range of alternatives. The DEIR seriously considers only the alternatives that are mandated in the Guidelines (the no-project alternative and alternatives discarded during EIR development), the Spring Street Alternative, and the so-called Transportation Management System (TSM) alternative. This letter will refer to this alternative as the Express Bus service, since it basically consists of expanded Dodger Express Bus service between Union Station and Dodger Stadium.

Response P700-63 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.” (CEQA Guidelines, § 15126.6(a).) Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how, as required by CEQA, the alternatives analysis included evaluation of the No Project Alternative in order to determine the consequences of not implementing the proposed Project. (See *id.*, § 15126.6(e).) CEQA also requires that an EIR identify one “environmentally superior alternative” from the range of reasonable alternatives that are evaluated; the “environmentally superior alternative” cannot be the “No Project” alternative or the underlying project.

The Draft EIR considered a “No Project Alternative,” the Spring Street Alignment Alternative, and the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express. 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. Further, 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. Section 4.2.1 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. The Draft EIR adequately identifies and analyzes a reasonable range of alternatives in full compliance with CEQA's requirements. Refer to Response P700-64 for discussion of how the proposed Project objectives comply with CEQA Guidelines section 15126.

Comment P700-64 The DEIR's second violation of CEQA and the Guidelines is that the list of Project objectives by which it evaluates the alternatives is carefully and heavily slanted to favor the proposed Gondola. For example, the objectives include providing passengers with scenic airborne views, which cannot be attained by any alternative to the Gondola. (Project Objectives 2 and 7, DEIR, p. 4-5 to 4-8), and listing the use of a gondola as a project objective in and of itself, one that no non-gondola alternative could achieve. (Objective 8, DEIR, p. 4-7.)

Response P700-64 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the proposed Project's 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 and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. 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.” (CEQA Guidelines, §15126.6(a)–(b).) The proposed Project's 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

proposed Project’s objectives are not so narrow that they preclude consideration of alternatives to the proposed Project, including the Transportation Systems Management Alternative.

Comment P700-65 Third and most important, the DEIR fails to develop the Express Bus expanded bus service alternative fully and accurately, so that it might be fairly evaluated. This alternative would avoid every significant environmental impact of the proposed Project, could be carried out quickly and with minimal construction, thereby avoiding all the lane closures, detours, and disruption that years of station and tower construction would cause, and would deliver almost every benefit expected from the Gondola.

The DEIR deliberately downplays the feasibility of the Express Bus alternative and its ability to avoid every significant impact of the Gondola Project while meeting almost every objective set out in the DEIR except the views and “unique experience” of the gondola and the increased connectivity with the State Historic Park and its surrounding neighborhood. The Guidelines explicitly provide that an EIR must “focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project *even if these alternatives would impede to some degree the attainment of the project objective*, or would be more costly.” Guidelines § 15126.4(b) (emphasis added).

Response P700-65 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Draft EIR considered a range of reasonable alternatives pursuant to CEQA. The Transportation Systems Management (“TSM”) Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and therefore is unlikely to achieve the GHG benefits of 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. As discussed in Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, and Section 4.0, Alternatives, of the Draft EIR, the TSM Alternative would fail to meet the following 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 Dodger Stadium Express 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 transit 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. In addition, the TSM Alternative would fail to fulfill Objectives 2, 7 through 10 and 12 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. 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 travelling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. Refer to Response P700-64 for discussion of how the proposed Project's 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.

Comment P700-66 B. The Spring Street Alternative Fails to Meet the Requirements of CEQA and Should Be Removed From the DEIR.

As noted by the Court in Save Our Capitol:

Meaningful analysis of alternatives in an EIR requires an analysis of meaningful alternatives. The purpose of an EIR "is not to identify alleged alternatives that meet few if any of the project's objectives so that these alleged alternatives may be readily eliminated. . . . [T]he key to the selection of the range of alternatives is to identify alternatives that meet most of the project's objectives but have a reduced level of environmental impacts." (Watsonville Pilots Assn. v. City of Watsonville (2010) 183 Cal.App.4th 1059, 1089, 108 Cal.Rptr.3d 577.)

The Spring Street Alternatives fails to comply with this mandate. It is not a meaningful alternative. As detailed in DEIR Table 4-1: Alternatives Conformance with Objectives, the Spring Street Alignment Alternative meets all of the Project Objectives. However, the Spring Street Alternative would impact a greater area with the State Historic Park, and as detailed in DEIR Table 4-3: Alternative Impact Comparison, the Spring Street Alignment Alternative does not reduce any of the Project impacts. This alternative thus fails to meet the basic purpose of an alternative, "to meet most of the project's objectives but have a reduced level of environmental impacts." It should therefore be eliminated from the DEIR as it serves only as a straw man.

Response P700-66 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Draft EIR considered a range of reasonable alternatives, properly identifying an

“environmentally superior” alternative and analyzing a “No Project” alternative, pursuant to CEQA. As discussed therein, 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 was included in the Draft EIR because it provides an aerial rapid transit option that would cross over the Los Angeles State Historic Park, and that maintained transit access to the Park and surrounding communities.

The Spring Street Alignment Alternative meets all of the following Project Objectives, including objectives not specifically linked to aerial rapid transit, to: (1) expand mobility options for transit riders through a direct connection between LAUS and Dodger Stadium; (2) attract new transit riders to the Metro system through a unique experience 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 emissions as a result of reduced vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special events 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 Dodgers 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; (12) provide a sustainability 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 minimize aerial rights requirements over private properties, taking into account existing and future adjacent land uses. Although the Spring Street Alignment Alternative would be consistent with the Project Objectives, it would require a larger footprint within the Los Angeles State Historic Park. 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.” Consideration of the Spring Street Alignment Alternative complied with CEQA, which does not prohibit consideration of alternatives that would impede, to some degree,

the attainment of the project objectives, or would be more costly. (CEQA Guidelines, § 15126.6(a).)

Comment P700-67 C. The Existing Express Bus Service to Dodger Stadium is a Feasible Alternative, and Would Avoid All Adverse Impacts of the Gondola.

The Express Bus alternative is identified by the DEIR as, along with the No Project alternative, the Superior Alternative. (DEIR, p. 4-75.) The DEIR states “both the No Project alternative and TSM [Express Bus] Alternative would not result in significant unavoidable impacts to any environmental considerations” (DEIR, p.4-74), a convoluted way of saying that the Express Bus alternative has no significant environmental impacts. The Express Bus avoids the Project’s construction impacts, which are the only significant impacts the DEIR acknowledges, and would avoid countless other impacts that the Project would cause, as discussed in this and other comment letters. As detailed below, it would also fulfill almost all of the Project’s objectives. Accordingly, Express Bus is superior to the Project, and should be adopted by Metro.

Express Bus service would take cars and their pollutant emissions off the road, although the DEIR does not bother to calculate how much pollution the Express Bus could eliminate. If the buses were upgraded to operate on electricity, the Express Bus alternative would also be zero-GHG emissions. Such buses would reduce air pollution in one of the nation’s most heavily polluted urban areas. (DEIR, p. 3.3-2.)

Although the Express Bus fleet might add to existing traffic, the DEIR ignores the obvious mitigation for this possibility of extending the existing bus-only lane on Sunset up Vin Scully Avenue and into the parking lots, thereby mitigating any congestion impacts, and making the lane reversible to prevent post-game/event congestion. The DEIR fails in its duty to examine feasible alternatives by failing to fairly and fully present the Express Bus alternative, thereby attempting to tip the scales to favor the Project. This is a violation of CEQA.

The DEIR at pp. 4-59 to 4-62 acknowledges that it is feasible to carry out the Express Bus (TSM) alternative. As Metro carefully structures this alternative, the Dodger Express bus fleet would expand to 77 buses from the current 7 to 11 buses, in order to be able to transport the same number of passengers as the Gondola is projected to carry (assuming the Gondola works as expected). (DEIR, p. 4-71.) The DEIR does not state, let alone prove, that this expansion would be infeasible. The DEIR makes no comparison between the cost of expanding the Express Bus service and the underestimated \$125 million price tag of the Gondola.²⁶ Expanded Express Bus service may well be cheaper, as well as a transportation method proven by years of local experience.

The DEIR states that this expanded bus fleet would require moving the bus loading/unloading area to a nearby Metro property and reconfiguring some parts of Union Station and the immediately surrounding streets. (DEIR, p. 4-61.) However, the

DEIR does not show that this is infeasible, only inconvenient. Given the number and months (in one or two cases, years) of lane closure and the resulting traffic diversion and congestion that the Gondola would cause (see, e.g., DEIR at 3.9-32 through 3.9-43), the expanded Express Bus service alternative is far more feasible and far less disruptive to Los Angeles residents. It would also confer the benefit on Metro that the expanded bus fleet would be available to provide zero-emission service on other routes on non-game, non-event days (about 265 days per year [DEIR p. 2-10]). It would also provide Metro with a much-needed opportunity to capture new fares that would benefit the entire Metro public transit system and Los Angeles residents more broadly. (See January 8, 2023, Wall Street Journal article, “Public Transit Goes Off the Rails With Fewer Riders, Dwindling Cash, Rising Crime,” p. 1, at https://www.wsj.com/articles/subwaymta-bart-public-transit-new-york-boston-san-francisco-11673198418?mod=hp_lead_pos7.)

By failing to fairly and fully present the Express Bus alternative – an alternative that is feasible, environmentally superior, majority-Project-goal fulfilling and public revenue generating – the DEIR violates CEQA.

Guidelines Section 15126.6(b) requires reasoned consideration of alternatives that do not meet every objective of a project’s proposer, or that increase costs. Here, the DEIR admits that the Express Bus alternative will meet or moderately meet Project Objective 3 (Provide efficient, high-quality transit from LAUS to Dodger Stadium [DEIR, p. 4-5]), Project Objective 4 (Enhance the safety of neighborhoods around Dodger Stadium by lessening the number of cars driving to and from Stadium games and events [DEIR, p. 4-6]), Project Objective 5 (Reduce transportation related pollution and GHG emissions [DEIR, p. 4-6]), Project Objective 6 (Increase connectivity to the region’s public transportation hub [DEIR, p. 4-6]), Project Objective 11 (Minimize the project’s environmental footprint [DEIR, p. 4-7]), and Project Objective 12 (Provide a sustainable form of transit [DEIR, p. 4-8]). Project Objective 13, relating to ART alignments, is not relevant to the Express Bus service. (DEIR, p. 4-8.)

While the Express Bus alternative would not meet Project Objectives 2 (Attract new transit riders to the Metro system through use of a gondola) and 7 (Improve transit rider experience by providing unique scenic views), these are self-serving, circular Objectives that favor the Gondola. The DEIR’s claim that expanded Express Bus service would not meet Project Objective 1 (Expand mobility options for transit riders) is not supported by any experience, only by speculation that a new mode of transit – the Gondola Project – is the only way to bring in an unquantified number of new riders to Metro. Given the success of the current Express Bus service (DEIR, pp. 4-59 to 4-60), such speculation is unfounded. Express bus service works.

Further, the DEIR has deliberately set up the Express Bus alternative for failure by designing it so that the buses would use compressed natural gas as fuel, instead of zero-polluting electricity. Posting the use of natural gas ensures continued pollutant

emissions, while use of electric buses would eliminate them. Again, the DEIR has chosen to present the Express Bus alternative in a way that makes this alternative fail to achieve important Project Objectives. The public and decision makers cannot know how long the Gondola's novelty will draw riders out of their cars, thereby reducing emissions of conventional pollutants and GHGs. In contrast, the Express Bus service has a proven track record, which could only be improved by an expanded and electric-powered bus fleet.

In addition, Metro currently operates a large number of Express buses that run from various outlying areas to downtown Los Angeles and other destinations, but that do not service Dodger Stadium. (DEIR, p. 3.17-13.) Some or all of these existing Express bus routes that service downtown Los Angeles could be modified to add Dodger Stadium as an additional or final stop on game or event days. This would allow them to bypass the crush at Union Station that the DEIR posits would result from increased Express Bus service. (DEIR, p. 4-60 to 4-61.) By ignoring this obvious opportunity, the DEIR again handicaps the Express Bus service in its comparison with the Gondola.

The DEIR should be revised and recirculated to make a fair comparison of the Gondola to expanded, electric Express Bus service as an alternative to the Gondola. Alternatively, the expanded, electric Express Bus service, including service from outlying areas, should be explored as an Alternative and compared to the Gondola.

Fairly considered, the TSM (Express Bus) alternative meets every non-Gondola-biased Project Objective except those dealing with enhancing transit connectivity for the State Historic Park and Elysian Park, and even these Objectives could be partially met if Metro simply set up transit hubs at these locations, something it does not need the Gondola to do.

As an alternative that eliminates the Project's environmental harm by not requiring the construction that produces the harm, that meets most of the Project's unbiased objectives, and that meets them with far less damage to the City's transportation systems than what will be caused by Project construction, the Express Bus alternative fulfills all the legal requirements for a viable alternative. Should Metro choose the Gondola as the project it approves, it must make the findings required by Public Resources Code Section 21081(a)(1), must justify rejecting the Express Bus alternative (per Public Resources Code Section 21002), including the Express Bus with the expansions proposed in this letter, and may need to adopt a Statement of Overriding Considerations, as required by Public Resources Codes Section 21081(b). All of these findings must be supported by substantial evidence in the record. The DEIR as it now stands cannot provide this evidence.

The DEIR must be revised and recirculated to fairly present and fairly consider the Express Bus alternative, expanded and powered by electricity, as an alternative.

Footnote 26: The \$125 million price tag does not include the price of a land lease at Union Station or the cost of acquiring land at Dodger Stadium. (ARTT Response to Metro’s Request for Information at p. 45.) The real cost of the proposed Project would be higher than the initial estimate, probably much higher.

Response P700-67 This comment provides a general recitation and characterization of the CEQA statute, case law, and regulations and the Draft EIR. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Draft EIR considered a range of reasonable alternatives, properly identifying an “environmentally superior” alternative and analyzing a “No Project” alternative, pursuant to CEQA. The Transportation Systems Management (“TSM”) Alternative for an enhanced Dodger Stadium Express 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. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Refer to Response P700-64 for discussion of how the proposed Project’s 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.

As discussed on page 4-63 and on page 4-71, 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.

As detailed in Topical Response H, a bus-only alternative with buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events 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 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. Refer to Response P700-63 for a discussion of how the Draft EIR complied with CEQA's requirements to analyze a reasonable range of alternatives, including a "No Project" alternative, to identify an "environmentally superior alternative," and to identify alternatives considered but rejected from further consideration.

This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P700-68 XIII. THE DEIR FURTHER VIOLATES CEQA BY ITS INAPPROPRIATE TREATMENT OF DESIGN OPTIONS.

The way the Design Options are placed in the DEIR implies that they are not alternatives or significant changes in the Project Description, since they come after both those sections, and calling them "Design Options" minimizes their potential importance. The term "Design Options" makes them sound like they are variants in the appearance, external finishes, or other features that are normally called "design," not changes in location or 25% increase in height. This is a failure of information. The DEIRs inclusion and treatment of "Design Options" has invalidated both the Project Description and Alternatives discussions in the DEIR, and represents an additional fatal flaw in the DEIR.

The Project sponsor and DEIR preparers are attempting to have it both ways, by providing a Project Description, but leaving room for the Project to revert to an earlier, pre-stakeholder-comments version of the Project, without actually including these project options in either an analysis of the Project or an analysis of a fully defined alternative. In this way, the DEIR piecemeals the analysis of a potential project.

At the very least, the DEIR should analyze a project which includes the impact-maximizing combination of design options, to identify the maximum potential project impacts. The DEIR can then use the design options to define a series of impact-reducing alternatives, and as part of the alternative's analysis make clear the package of mitigation measures that appropriately apply to each alternative. Decision-makers would thus be provided with the information they would need to select the Alternative with the best impact-reducing combination of design options, or would actually be able to understand the environmental consequences of picking a particular combination of design options, as each possible combination would represent a discrete alternative. Currently, as written, the design options represent a red-herring that only serve to confuse the reader about the likely impacts of the Project and the likely alternatives under consideration. This is unacceptable under CEQA.

Response P700-68 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how 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 Section 2.0, Project Description, and analyzed in Chapter 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 components of the proposed Project should the decisionmaker determine such a minor variation is desirable as part of the proposed Project. As discussed in Topical Response H, the proposed Project is described consistently throughout the entire Draft EIR, clearly identifying the proposed Project's potential environmental impacts. CEQA recognizes that a lead agency has the flexibility to approve project changes if all components of the revised project were evaluated in the 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. The design and use options studied in Section 6.0 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. Further, because the Design Options are included as part of the Draft EIR, stakeholders can and have provided comments during the Draft EIR public review period, contrary to this commenter's assertion that the proposed Project could "revert to an earlier, pre-stakeholder-comments version of the Project."

Comment P700-69 XIV. THE DEIR FURTHER VIOLATES CEQA BY ITS FAILURE TO ADEQUATELY ANALYZE GROWTH INDUCING IMPACTS.

The proposed Project constitutes the construction of a new fixed-route transit system and expansion of fixed-route transit into an area, the Dodger Stadium property, currently not directly served by transit, except on game days. Currently the closest, non-game-day transit is the Number 4 bus, and the closest transit stop to the Stadium property is at Sunset Boulevard and Vin Scully Avenue. The Project thus constitutes an extension of service between the Union Station and Chinatown areas directly onto the Dodger Stadium property.

As discussed more fully above, the Project is not included in the City's Mobility Plan 2035 or in the Transportation System Project List used in preparing the Regional Transportation Plan (Connect SoCal 2020 or the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy). The Project thus removes an obstacle to

population growth in the Dodger Stadium area in a way that is not consistent with existing land use plans. It therefore is not growth-accommodating. Rather, it is potentially growth-inducing and thus a robust analysis of likely growth-inducement is required in a recirculated DEIR, including in accordance with Guidelines Section 15126.2(d).

The analysis of growth-inducing impacts currently in the DEIR reads like a publicity piece for the proposed Project. The analysis also relies, as a way of avoiding analysis of growth-inducing impacts, on the statement that should “any future development occur in the surrounding proposed Project area, as discussed in Section 3.11, Land Use and Planning, such development would be subject to additional environmental analysis under CEQA, and would be required to comply with City of Los Angeles Community Plan policies encouraging development near transit stations and corridors.”²⁷ The CEQA mandate to address growth-inducement cannot be avoided in this way.

The proposed Project is a private transit system that would extend access to the Dodger Stadium area. As discussed earlier in this letter there are good existing available transit options from the Union Station area to Chinatown. The only area not well served by transit, except on game days, is the Dodger Stadium area.

Given the existing competing transit options for travel between the Union Station area and Chinatown, the Project system will likely largely need to depend on fares to Dodger Stadium to support the system. Given that it has been announced that the fares, for game ticket holders who are projected to be the primary users of the Project²⁸ will likely be zero, as previously documented in this letter, some source of revenue will be needed to keep this capital-intensive system in operation. Given that such a source has not been disclosed, it is reasonable to assume that additional fare-paying ridership would thus be required to make the system financially viable and that the Project is intended to foster development in the Dodger Stadium area to generate riders, and thus to be growth-inducing. As has been noted by commentators in the link provided above:

the proposed gondola would be the first step in an entirely new system – a literal ticket to nowhere for approximately 280 days a year. If the goal is to use this project as a backdoor to creating a new neighborhood in the vicinity of Dodger Stadium, **like the one in Atlanta or the one being proposed in Kansas City, the backers of this project need to have the intellectual honesty to say so.**

The DEIR thus needs to analyze the likely growth-inducing impacts of the Project, including its potential to foster growth in the Dodger Stadium area. In addition, the DEIR needs to disclose any intended development Plans for the Dodger Stadium vicinity, and to address those Plans in a recirculated DEIR, as failure to do so constitutes improper piecemealing or project-splitting under CEQA.

Footnote 27: DEIR page 5-60.

Footnote 28: See DEIR Table 3.17-4 reproduced earlier in this letter.

Response P700-69 Refer to Section 5.4, Growth-Inducing Impacts, for a discussion of the potential growth-inducing impacts of the proposed Project as required by Public Resources Code Section 21100(b)(5). Pursuant to CEQA Guidelines Section 15126.2(e), an EIR need only discuss “the ways in which” the proposed project could foster growth, and accordingly does not require an EIR to provide a detailed analysis of the proposed project’s effects on growth. A general analysis is sufficient. The Draft EIR’s growth inducing analysis considered the potential growth-inducing impacts from the proposed Project in pages 5-57 through 5-60 of the Draft EIR, concluding that construction and operation of the proposed Project would result in less than-significant growth-inducing impacts, with respect to whether the proposed Project would foster population or employment growth, or the construction of additional housing, either directly or indirectly, on both a regional and local scale. As discussed in Section 5.4, and as noted in this comment, the proposed Project does not remove obstacles to growth but instead would increase connectivity in the densely urbanized downtown Los Angeles and provide 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. As discussed in Chapter 2, Project Description, Dodger Stadium is one of the region’s most visited venues; however, 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, throughout the surrounding communities, and on the nearby freeways. 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. When complete, the travel time from LAUS to Dodger Stadium would be approximately 7 minutes during peak operations (games/events at Dodger Stadium). Approximately 20 percent of visitors could take aerial transit connected to Metro’s regional transit system. 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. Further, 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.

Development at Dodger Stadium and in the communities surrounding the alignment would still require their own set of approvals and analysis. Refer to 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 for a discussion of how the proposed Project solely proposes an aerial gondola system and was not improperly

segmented or “piecemealed” from a larger development project at the Dodger Stadium property. 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. As discussed in Topical Response G, the Dodger Stadium property is approved only for Dodger Stadium and ancillary uses as set forth in the Conditional Use Permit for the Dodger Stadium property, and structures, with restrictive designations and zoning not consistent with the uses speculated in this comment. Accordingly, the potential for development at Dodger Stadium is not reasonably foreseeable, and the Draft EIR’s growth inducing analysis need not consider speculative potential impacts pursuant to CEQA Guidelines section 15145. Refer to Section 2.1, 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. 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. Refer to Response P700-47 for a discussion of the underlying assumptions for proposed Project ridership and VMT reductions, considering the linked article from lay commenters referenced in this comment.

This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment Letter P701 - S&R Partners, LLC, a Riboli Family Company

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to P701

Comment P701-1 Re: Comments on Draft EIR for Los Angeles Aerial Rapid Transit project (LA ART), SCH # 2020100007

Dear Mr. Zelmer:

This firm represents S&R Partners, LLC, a Riboli Family company. The family has been a stakeholder in the immediate vicinity of the proposed Los Angeles Aerial Rapid Transit project (Gondola Project or Project) for more than a century since the founding of the San Antonio Winery in 1917. The family is proud to be a multi-generational contributor to the local and regional economy in Los Angeles. The family is a proud employer of hundreds of local residents, and participates philanthropically and civically with leading community-based nonprofit organizations. The family members who run the business were raised in the community within walking distance to the Historic State Park, Chinatown, Solano Canyon, and Lincoln Heights.

Please keep this office on the list of interested persons to receive timely advance notice of all hearings, votes and determinations related to the proposed Los Angeles Aerial Rapid Transit project (Project), its DEIR and requested entitlements.

Pursuant to Public Resources Code Section 21167(f), please provide a copy of each and every Notice of Determination issued in connection with the Project.

Response P701-1 Metro has and will continue to comply with its obligations under CEQA, including related to the provision of notices in connection to the proposed Project's environmental review.

Comment P701-2 A. The Proposed Project's Location on Public and Private Properties.

According to the DEIR, the Project's stations and towers would range in height from 78 to 195 feet high. The cable for the gondolas would be suspended as high as 175 feet above the ground, and:

- Alameda Station - would be located on Alameda Street adjacent to the planned LAUS Forecourt and Placita de Dolores between Los Angeles
- Street and Cesar 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.
- Alameda Tower - would be 195 feet tall with the cable suspended 175 feet above-ground.

- Alpine Tower - would be 195 feet tall at its tallest point, with the cable suspended 175 feet above ground.
- China Town/State Park 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.
- Broadway Junction – this non-passenger 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.
- The Stadium Tower - would stand 179 feet tall with the cable suspended 159 feet above-ground.
- The Dodger Stadium Station – would be approximately 194 feet long, 80 feet wide, and 74 feet high at its tallest point.

With the exception of its terminus at Dodger Stadium, the Project's stations and towers would be constructed on public land, and the gondolas would pass over both public and private property. As noted on DEIR pages ES4-ES8:

- 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.
- Alameda Tower would be constructed on the Alameda Triangle, a portion of City Right of Way (ROW) between Alameda Street, North Main Street, and Alhambra Street.
- The proposed Alpine Tower would be constructed at the corner of Alameda Street and Alpine Street on city-owned property.
- 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 Broadway Junction would be located at the northern corner of the intersection of North Broadway and Bishops Road (1201 North Broadway) on primarily privately-owned property.
- 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.

According to the DEIR, the alignment travels over City of Los Angeles right of way, City-owned Property, Metro Property, Caltrans Property, California State Parks Property, and Private Property, as shown in the following Figure reproduced from DEIR Appendix Q. A map should also be provided and coded to show the location of both the public and private land within the full Area of Potential Impact (API) as shown in DEIR Figure 3.1.1. The Project thus involves the use of public land – and the presumed forced taking of private land, not discussed in the DEIR – by a private Project sponsor.¹ DEIR Appendix Q also indicates that the Project requires the acquisition of American National Standards Institute (ANSI) required aerial rights² over the following properties, something not disclosed in the Project Description in the body of the DEIR:

- 1028 N. Alameda St.
- 903 N. Main St.
- 901 N. Main St.
- 1251 N. Spring St.
- 1201 N. Broadway
- 455 Savoy St.
- 451 Savoy St.
- 1800 Stadium Way

Footnote 1: DEIR page ES-1.

Footnote 2: ANSI Standard B77.1 regulates vertical and horizontal clearances between the ropeway and cabins to elements such as vehicle, pedestrians, vegetation, buildings, and other structures.



Land Ownership Along the Project Alignment

Source: DEIR Appendix Q

Response P701-2 This comment requests a map that is coded to show the location of public and private land within the area of potential impact (API). As described in Section 3.1.2, of Section 3.01, Aesthetics of the Draft EIR, the API refers to the geographic area of project visibility for purposes of evaluating the proposed Project’s potential visual and aesthetic impacts. The API is broader than the proposed Project’s alignment.

Section 2.5.1 of Section 2.0, Project Description, of the Draft EIR details the proposed Project’s alignment, noting that 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 2-8 in Section 2.0, Project Description, shows the portions of the proposed alignment over public ROW and publicly owned property and the portions of the proposed alignment over private property, which are described more specifically in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR. The Draft EIR does not need to be revised to include a map of the land ownership within the API.

This comment also assumes that the proposed Project will involve the taking of private land. As described throughout the Draft EIR, the proposed Project would require aerial easements for certain properties along the proposed Project (see Sections 2.5 of Section 2.0, Project Description, and 3.11.1, Figure 6-12 of Section 3.11, Land Use and Planning). How the Project Sponsor acquires the aerial rights for the proposed Project is beyond the scope of the Draft EIR. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project’s environmental impact. (See, e.g., CEQA Guidelines § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project’s potential environmental impacts. CEQA does not require “a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters” and lead agencies are not required to “provide all information requested by reviewers.” (*Id.*, § 15204.) Further, to the extent eminent domain is used to acquire property rights necessary for operation of the proposed Project, the exercise of eminent domain by any public agency would be subject to a separate process as required by California law. Refer to Response P701-7 for further discussion of Metro’s eminent domain authority.

Finally, this comment states that although Appendix Q indicates that the proposed Project requires the acquisition of American National Standards Institute (ANSI) aerial rights over properties within the proposed Project alignment, this information has been omitted from the Section 2.0, Project Description. CEQA does not require that this level of detail be included in the Project Description. (CEQA Guidelines § 15124.) The Project Description already describes aerial clearances needed to comply with the ANSI Standards in Section 2.4.6 and directly refers to Appendix Q, which contains additional information on this topic. (See Draft EIR, p. 2-19.) Moreover, Figure 2-7 in

Section 2.0), Project Description depicts the ANSI requirements and Additional Separation Buffer.

Comment P701-3 B. The DEIR's Lack of Clarity on the Issue of Eminent Domain.

The DEIR needs to specify if Metro contends that it has the power of eminent domain for use in furtherance of the Project. If yes, then the DEIR should identify the specific statutory bases, if any, that would allow it to exercise the power of eminent domain for the Project.

The DEIR also needs to include a map, keyed to document the mechanisms which would be used within the API, to allow private use of public lands. For example, DEIR pp. 2-81 to 2-82 appears to indicate that in the case of the City of Los Angeles, this would be accomplished via a franchise agreement and a 20-year Development Agreement.

The proposed franchise agreement and Development Agreement must be made available concurrently with a recirculated DEIR.

Response P701-3 The purpose of the Draft EIR is to inform the public and decision makers generally of the significant environmental impacts of the proposed Project. (See CEQA Guidelines § 15121(a).) The focus of an EIR is the significant effects on the environment (*id.*, § 15143), not on the mechanisms for how property for a proposed project may be acquired. The Draft EIR explains the mechanisms, including aerial easements, that may be required for operation of the proposed Project. (See, e.g., pp. 2-61 to 2-62 of Section 2.0, Project Description.) CEQA does not require the Draft EIR to also include a map keyed to these mechanisms. (CEQA Guidelines § 15204 [lead agencies are not required to “provide all information requested by reviewers.”].) It is also speculative at this point whether Metro, or any public agency, would need to exercise its eminent domain authority. (See CEQA Guidelines § 15145 [CEQA does not require speculation].) Finally, CEQA does not require Metro to provide drafts of a proposed franchise agreement or Development Agreement concurrently with a Draft EIR. Such documents would be negotiated with the City of Los Angeles, acting as a responsible agency for the proposed Project. (See Draft EIR, pp. 2-61 to 2-62.) This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5. Refer to Response P701-7 for further discussion of Metro's eminent domain authority.

Comment P701-4 In addition, the DEIR should inform the public what the proposed mechanism is for acquisition of aerial rights and the associated permitting agency(s). In the absence of clear information regarding the mechanism for allowing private use of public lands, and for acquiring aerial rights over private lands particularly if forcibly taken through eminent domain, the Project description is deficient.

Response P701-4 The Draft EIR describes the potentially required permits and approvals for the proposed Project's operation within or over public rights-of-way, such as aerial

easements, and the responsible agencies in Section 2.10 of Section 2.0, Project Description, including permits and approvals from Metro, the City of Los Angeles, State Parks, and Caltrans. CEQA does not require the Draft EIR to identify how the Project Sponsor will acquire any property interests necessary to operate the proposed Project across public or private lands. (See, e.g., CEQA Guidelines § 15143 [“The EIR shall focus on the significant effects on the environment.”].) Refer to Responses P701-3 and P701-7 for further discussion of Metro’s eminent domain authority.

Comment P701-5 As noted in the Historic Resources Technical Report included in Appendix G of the DEIR, there are 12 previously-identified historical resources within the proposed Project’s API. Two of the historical resources are historic districts with contributing resources located within the API. In addition, the historic resource consultants identified the El Grito mural as eligible for listing in the National Register of Historic Places (National Register).

The next Figure, reproduced from DEIR Appendix G, shows the Project alignment and API defined for purposes of analyzing the historic resource impacts of the Project.

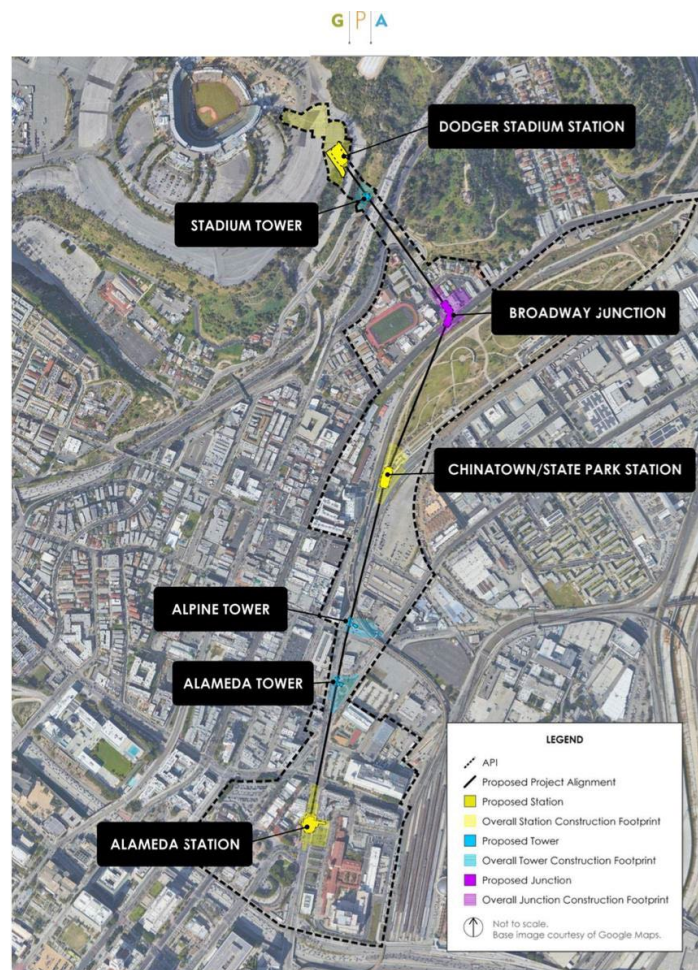


Figure 3: Area of Potential Impact (API). Base image courtesy of Google Maps.

Project Alignment and Area of Potential Impact

Source: DEIR Appendix G

The historic resources within the API identified in DEIR Appendix G include:³

1. Los Angeles Union Station Passenger Terminal and Grounds
 - 1A. Macy Street Grade Separation
2. Los Angeles Plaza Historic District
 - 2A. Garnier Block
 - 2B. Sanchez Building
 - 2C. Old Plaza Fire House
 - 2D. Hellman-Quon Building
 - 2E. Masonic Hall (Masonic Building)
 - 2F. Merced Theatre
 - 2G. Pico House (Pico Hotel)
 - 2H. Vickrey-Brunswick Building
 - 2I. Plaza House
 - 2J. Plaza (Plaza Area, Plaza Park)
 - 2K. Old Plaza Church (Nuestra Señora Reina de Los Angeles Church [Our Lady Queen of the Angels])
 - 2L. Plaza Community Center (Biscailuz Building)
 - 2M. Plaza Methodist Church
 - 2N. Plaza Substation
 - 2O. Avila Adobe
 - 2P. The Winery
 - 2Q. Machine Shop
 - 2R. Sepulveda House
 - 2S. Pelanconi House
 - 2T. Hammel Building
 - 2U. Italian Hall
3. El Grito (The Cry) Mural
4. Los Angeles Terminal Annex Post Office
5. Philippe the Original
6. Granite Block Paving
7. Capitol Milling Company
8. 1035 N. Broadway
9. St. Peter's Italian Catholic Church
10. Cathedral High School
11. 451 E. Savoy Street
12. Charles B. Wellman Residence
13. Arroyo Seco Parkway Historic District

Footnote 3: DEIR Appendix G, page 17.

Response P701-5 This comment provides a general recitation and characterization of Section 3.5.2 Environmental Setting, of Section 3.05, Cultural Resources, of the Draft EIR. 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 P701-6 DEIR page ES-9 indicates that construction of Broadway Junction requires the demolition of the existing commercial building located at 1201 N. Broadway. Does the Project sponsor own this building, or must it be acquired? If it must be acquired, what is the mechanism of acquisition? In the absence of this information, the Project description is again deficient.

Response P701-6 Ownership of 1201 N. Broadway is beyond the scope of the Draft EIR and Project Description. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project’s environmental impact. (See, e.g., CEQA Guidelines § 15124.) Section 2.5.1.4 of Section 2.0, Project Description, of the Draft EIR explains that the existing commercial building located on 1201 N. Broadway would be demolished prior to construction in order to develop the Broadway Junction. The Draft EIR also describes and analyzes the potential environmental impacts associated with demolition of the existing commercial building located at 1201 N. Broadway. (See, e.g., Draft EIR, pp. 3.2-4, 3.4-9, 3.4-16, 3.5-48, 3.9-28 to 3.9-30, 3.9-47, 3.19-19, 3.19-25, 3.20-19, 3.20-32.) As stated in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR, the Project Sponsor has an arrangement for aerial rights over 1201 N. Broadway.

Comment P701-7 C. Eminent Domain Concerns and Questions.

Although the DEIR does not explicitly reference Metro’s use of eminent domain, a hidden assumption within the DEIR and Project description is Metro’s supposed ability to exercise the power of eminent domain against private property owners for the benefit and advantage of LA ART, the private Project proponent. The DEIR fails as a legal document on this ground.

Although LA ART in response to comments it provided to Metro suggests Metro has the power of eminent domain to forcibly take the private property rights of other parties in furtherance of the Project, the stated statutory “rationale” as supplied by LA ART to Metro was based on Public Utilities Code provisions. (Exhibit 1 [LA ART Phase II Request for Additional Detailed Information, p. 9].)

However, those cited sections (PUC §§ 130252 and 130254) do not clearly provide Metro with the power of eminent domain for a project such as the Project, which throughout the DEIR and public record concerning the Project has unambiguously been described as being privately funded, privately operated and privately owned. Indeed, contrary to LA ART’s assertions and the DEIR’s assumptions regarding Metro’s alleged ability to use eminent domain for the Project, PUC Section 130521 provides:

The commission may acquire by deed, purchase, lease, contract, gift, devise, or otherwise, any real or personal property, structures, rights, rights-of-way, franchises, easements, air, land, and development rights, and other interests in

lands located within this state necessary or convenient for the construction or operation of a project, upon terms and conditions it deems advisable, and to lease, develop, jointly develop, maintain, operate, or dispose of any property, right, or interest in the manner that is necessary or desirable to carry out the objects and purposes of this chapter. Nothing in this chapter provides eminent domain power. (Emphasis added.)

As a result, we believe the Project and DEIR are based on the false premise that Metro can use eminent domain to seize private property owners' private property rights for the benefit of LA ART and the Project.

Response P701-7 The purpose of the Draft EIR is to inform the public and decision makers generally of the significant environmental impacts of the proposed Project. (See CEQA Guidelines § 15121(a).) The focus of an EIR is the significant effects on the environment (*id.*, § 15143), not on the mechanisms for how property for a proposed project may be acquired. It is speculative at this point whether Metro, or any other public agency, would need to exercise its eminent domain authority. (See CEQA Guidelines § 15145 [CEQA does not require speculation].)

This comment also misinterprets Metro's eminent domain authority. Metro is a public entity duly organized and existing under the laws of the State of California and is vested with the authority to exercise the power of eminent domain to acquire private property for transportation purposes pursuant to the Public Utilities Code. (See, e.g., Pub. Util. Code §§ 30503, 30600, 130220.5(a).) Further, Public Utilities Code section 180152 confers broad authority on Metro to "make contracts and enter into stipulations of any nature whatsoever, either in connection with eminent domain proceedings or otherwise . . . and to do all acts necessary and convenient for the full exercise of the powers granted in this division." Public Utilities Code section 130521, which comes from the Los Angeles County Transportation Commission Revenue Bond Act, does not preclude or prohibit the exercise of eminent domain. The purpose of the Revenue Bond Act is "to provide an alternative method of financing in acquiring, constructing, or rehabilitating facilities to be used as part of [Metro's] transit systems." (Pub. Util. Code § 130502.) Refer to Response P701-3 for further discussion. The attached document is noted but predates the initiation of environmental review for the proposed Project and accordingly does not have any bearing on the sufficiency of the Draft EIR. Accordingly, no further response is required. However, the comment suggests that the Project Sponsor supplied the document attached to this letter to Metro. Rather, the attached "Exhibit 1" is Metro's request for additional information regarding the project as part of the unsolicited proposal process, including which policies may potentially apply. "Exhibit 1" does not provide the Project Sponsor's responses to this request, contrary to this comment's characterization of the document.

Comment P701-8 In addition to violating our client's constitutional rights under California Constitution Article I, § 19, and the 5th Amendment to the U.S. Constitution, and similarly the

rights of other private property owners, the structure of the Project and implied ability of Metro to seize private property for it, implicates a separate violation of CEQA, that of predetermination. “[A]n EIR must be performed before a project is approved, for [i]f postapproval environmental review were allowed, EIR’s would likely become nothing more than post hoc rationalizations to support action already taken.’ (Laurel Heights I, at p. 394, 253 Cal.Rptr. 426, 764 P.2d 278.)” *Save Tara v. City of West Hollywood* (2008) 45 Cal.4th 116, 130. The DEIR already, implicitly, embodies a determination by Metro that it will attempt to aid LA ART, the private Project proponent, through the use of eminent domain – over the objections of private property owners such as our client. That is a form of precommitment that undermines the legality of the DEIR and shows Metro “failing to proceed in the manner CEQA provides.” *Id.* at 131.

Rather than simply accede to this premise, we ask the following of Metro and request a clear and direct response:

Does Metro contend it has the power of eminent domain to take private property or private property rights for and/or in furtherance of the Project?

This issue has not been openly addressed in the DEIR, but must be as part of this process.

Response P701-8 As CEQA requires, Metro prepared the Draft EIR for the proposed Project in order for the public and decision makers to meaningfully evaluate the proposed Project’s potential environmental impacts. (See CEQA Guidelines § 15121(a).) Metro will consider whether to certify the EIR and approve the proposed Project at a public hearing in the future. Metro has not pre-committed to the proposed Project. Further, it is speculative at this time to assume Metro would exercise its eminent domain authority to acquire property for the proposed Project. (CEQA Guidelines § 15145.) If Metro decides to exercise that authority, it will be subject to the statutory processes set forth in California Code of Civil Procedure sections 1240.10 *et seq.* Refer to Responses P701-3 and P701-7 for discussions of the use for eminent domain for the proposed Project and Metro’s eminent domain authority.

Comment P701-9 D. Conclusion.

If the Project sponsor seeks to proceed with the Project, the DEIR must be rewritten to correct these errors and omissions and then recirculated for public review and comment. Thank you for your review and responses to these comments.

Very truly yours,

/s/ Robert P. Silverstein

ROBERT P. SILVERSTEIN

FOR

THE SILVERSTEIN LAW FIRM, APC

Response P701-9 This comment and the comments raised in this letter do not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment Letter P702 – Savoy Street

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to P702

Comment P702-1 We, as residents of Savoy Street, are writing to voice our opposition to the Los Angeles Aerial Rapid Transit Project (“The Gondola” to Dodger Stadium, or “The Gondola Project”). This project has been – and continues to be – pushed on us without adequate information.

Response P702-1 This comment indicating opposition to the Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project’s public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment P702-2 The first-time residents were notified about The Gondola was in September 2020, with the Notice of Preparation of the Draft EIR. By that time, LA ART had already selected the two potential routes for The Gondola. This happened without any public outreach or meetings, depriving us of the opportunity to provide input early-on for a private developer’s plan to occupy the airspace over our homes, public streets and parks. Metro has betrayed our communities by approving LA ART’s outreach plan and allowing the project to progress to this stage through this untransparent and backward process, front-loading the approvals process with the EIR.

Response P702-2 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project’s public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project’s scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. 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. 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. Consistent with CEQA Guidelines section 15004(b), the Draft EIR was “prepared as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment.” Under CEQA, the purpose of a Final EIR is to respond to comments received on the Draft EIR during the public review period and incorporate changes to a proposed project in response to such comments. (CEQA Guidelines, § 15088). Consistent with CEQA, comments received on the Draft EIR were responded to in the Final EIR.

Comment P702-3 To this day, LA ART still has not provided a feasibility study or funding plan. We can only wonder if this enormous infrastructure project is financially sustainable. Without adequate and consistent funding, The Gondola cannot be properly maintained and secured, and would pose a safety risk to our communities, creating a substantial liability for taxpayers. The news that Frank McCourt intends to “donate” the gondola project to Climate Resolve, a nonprofit with zero experience with construction and operation of transit projects and an annual budget of less than \$1 million, does not inspire confidence. Furthermore, according to the documents submitted for Metro’s November 16, 2022, Ad Hoc Olympics Planning Committee meeting, Metro has listed the Aerial Rapid Transit project on a comprehensive list of projects under consideration for federal and state funding in preparation for the 2028 Olympic Games. This suggests that the staff at Metro believes that public funding is needed for this project, despite all of the claims that The Gondola would not use taxpayer dollars. Metro should not be volunteering to seek out taxpayer dollars for a project that claims to be 100% privately financed.

Response P702-3 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. 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 funding for consultant and technical work for the EIR. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. Operation and maintenance costs are proposed to be fully funded out of Project revenues. No public sources of funding have been sought or committed to the proposed Project. At Metro’s November 16, 2022, Ad Hoc Olympics Planning

Committee meeting, the Committee approved the 2028 Games Mobility Concept Plan – 2022 Prioritized Mobility Concept Plan Project List (Attachment A). The proposed Project was not included in the 2022 Prioritized Mobility Concept Plan Project List (Attachment A).²³

Comment P702-4 Even when we were finally notified in September of 2020 with the NOP, the information provided was vague. There was no initial or feasibility study – this for a mode of transit that is novel to the US. Instead of a feasibility study, there was a figure, erroneously labeled “Examples of Gondola Systems,” which included photos of cable car systems from around the world. None of those systems use 3S gondola technology for urban transit at the capacities planned for The LA ART Gondola. The only aerial cable systems used for urban transit in the US are the Portland Aerial Tram and the Roosevelt Island Tram. Trams, however, are much simpler; they are lower-capacity systems with only 2 cabins that stay attached to their haul rope and alternate back and forth between two stations. 3S tricable gondolas are detachable grip systems that circulate 20, 30 or even 50+ cabins at a time between two or more stations. LA ART’s suggestion that The Gondola project uses proven technology for this proposed application is disingenuous at best.

Response P702-4 The proposed Project’s Notice of Preparation (“NOP”) complied with CEQA. CEQA Guidelines section 15082(a)(1) only requires an NOP to include a description of the project, location of the project (either by street address or attaching a map), and the probable environmental effects. The NOP fully complied with Section 15082(1)(a), providing an adequate project description, the project location (including a map of the proposed project alignments as well as a narrative description), and probable environmental effects. Sufficient information was provided in the NOP to guide the responsible agency consultation process, as the NOP provided a written project description detailing the components of the proposed aerial gondola system, the proposed project alignment, project location and environmental setting, as well as the overall project purpose. Consistent with CEQA Guidelines section 15004(b), the Draft EIR was “prepared as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment.” Moreover, the Draft EIR itself serves as a “feasibility study” for the proposed Project, with 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project’s potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. 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

²³ Los Angeles County Metropolitan Transportation Authority (LA Metro). 2022. 2028 Games Mobility Concept Plan (Attachment A). Available at: <https://datamade-metro-pdf-merger.s3.amazonaws.com/ad-hoc-2028-olympics-committee-6b993d455bc3.pdf>. Accessed August 2023.

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 P702-5 As several commenters noted in their NOP comments, the Notice of Preparation did not contain adequate information for the public to make informed comments about the potential impacts that should be examined in the draft EIR. Problems with the NOP include the following:

- Zero information was provided about the towers, what they might look like, how many there might be and where they could be located.
- There was no information about the intermediate stations, except their locations on a map.
- The approximate height of the cables and cabins – over our homes, streets, and parks – was also not disclosed in the NOP.
- The NOP announcement was so confusing that at least one person, who stated their support for the project, claimed to live under the path of the gondola, when in actuality, their residence was nowhere near either of the proposed routes.
- The NOP also did not include an intermediate station at the southern entrance of Los Angeles State Historic Park. This station was not publicly disclosed until 8 months later, in May 2021. The decision to locate a station at this location and to study it in the DEIR was made without any prior notice or opportunity for community feedback.

Response P702-5 Refer to Response P702-4 for a discussion of how the NOP complied with CEQA. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The public input during this period led directly to changes to the proposed Project to incorporate public feedback, including changes to the proposed Project alignment to include the intermediate Chinatown/State Park Station, redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of outreach and community engagement during the Draft EIR public review period and community engagement efforts during the preparation of the Final EIR. Consistent with CEQA Guidelines section 15004(b), the Draft EIR was "prepared as early as feasible in the planning

process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment.”

Comment P702-6 Metro, in its role approving LA ART’s outreach plan, has betrayed us. This DEIR, which is filled with misleading images and false assumptions that minimize the impacts of this project is a further betrayal and insult. Despite the breadth of this 8,000 page document, there is still little information addressing how this gondola, which would be new technology for LA, would be operated, secured, financed, and maintained. This document fails as an informational document.

Response P702-6 The comment provides a series of general statements regarding the standards of adequacy for an EIR, including the operation, security, financing, and maintenance. Refer to Section 2.0, Project Description, of the Draft EIR for a discussion of the proposed Project design, system operations (including typical operating logistics, queuing and ticketing/fare checking, maintenance, safety systems and ancillary elements, and other such features), and technology. Refer to Topical Response J, Gondola Design and Operations, for discussion of the proposed Project’s design and operations, including discussion of the safety and operations features of the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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. No public sources of funding have been sought or committed to the proposed Project. The general comments regarding adequacy of the Draft EIR are either not specific to the analysis contained within the Draft EIR or are requesting formatting and content that is otherwise not required by CEQA. Accordingly, no further response is required.

The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project’s potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA’s requirements for a Draft EIR.

Comment P702-7 Only after the technical and financial feasibility of the LA ART gondola project was established should there have been a draft EIR and a comment period. Metro and LA ART are asking members of the public to comment on the environmental impacts of a project when the project still has too many unknowns, especially in terms of implementation, which will be critical to both the impacts and sustainability of this project. This has been, and continues to be, an enormous waste of our collective time and energy.

Response P702-7 As discussed 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 rapid transit technology as a feasible mode of urban rapid transit. 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 operate safely, efficiently, and in concert with their surrounding urban environments. Furthermore, prior to the release of the Draft EIR, analysis was conducted to consider the technical feasibility, constructability, and operational potential of the proposed Project. Over the course of the proposed Project’s feasibility analysis and engineering leading up to the Notice of Preparation, the proposed Project continued to evaluate the proposed Project’s stations, junction, and towers. The Draft EIR itself also serves as a “feasibility study” for the proposed Project, analyzing the proposed Project’s potential environmental impacts. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project’s environmental impact. (See, e.g., 14 Cal. Code Regs. § 15124.) Consistent with CEQA Guidelines section 15004(b), the Draft EIR was “prepared as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment.” The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project’s potential environmental impacts. CEQA does not require “a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters” and lead agencies are not required to “provide all information requested by reviewers.” (Id., § 15204.)

Comment P702-8 In order to protect our rights, however, we have prepared a list of our concerns regarding the DEIR document and the impacts of this project. The Broadway Junction and the path of the gondola directly over our 100+ year old neighborhood would have an enormous impact on our lives.

Response P702-8 This comment provides a general introduction to the comments raised in this letter. Responses to the remaining comments contained in this letter are provided below in Responses P702-9 through P702-134.

Comment P702-9 Invasion of Privacy

The DEIR should explain how the proposed “smart glass” would work, how much it would cost, whether it is feasible or cost prohibitive to maintain, and how would it be implemented. For example, when/where along the route does the glass get activated and which windows are activated at each location? We believe the questions of when the smart glass would be activated should be answered along the entire route, especially where the gondola passes near residences including Mozaic Apartments, Metro Lofts, the future College Station development, Blossom Plaza, and the neighborhoods around Cottage Home Street and Savoy Street.

Response P702-9 Refer to Topical Response J, Gondola Design and Operations and Section 2.0, Project Description, of the Draft EIR, for discussion of how 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.

Comment P702-10 The following pages are Google Earth images along the gondola route at the approximate height of the gondola cabins:



Google Earth View of Mozaic Apartments, 84 ft above ground



Google Earth View of Metro Lofts from 151 ft above ground, facing north



Google Earth View of Metro Lofts from 151 ft above ground, facing west



Google Earth View of Broadway Junction Site, view from 45 ft above ground

The following two images are Google Earth images in the neighborhood of the Broadway Junction, on Savoy Street. The images are much higher than the views that passengers would see from the cabins. Google Earth did not have view available at the height of the gondola cabins.



Google Earth Eye view at Broadway Junction Site, Approximately 65ft above ground. This is 20 ft higher than the view from gondola cabin (could not go lower on Google Earth).



Google Earth Eye view at Broadway Junction Site – Approximately 65ft above ground. This is 20 ft higher than the view from gondola cabin (could not go lower on Google Earth).

Response P702-10 As the commenter notes, the Google Earth images are approximations and do not accurately reflect views from the proposed Project’s cabins. Refer to Appendix A, KOP Figure Mapbook, to Appendix C, Visual Impact Assessment, of the Draft EIR, for visual simulations of “key observation points” (“KOPs”) of the proposed Project, including visual simulations of the views from proposed Project’s cabins in KOPs 28a and 28b. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including simulations provided for additional clarity regarding certain design elements of the proposed Project.

Comment P702-11 If the “smart glass” malfunctions, will video cameras inside the gondolas record views of our private yards and through windows? We are relying on a private company to keep this system in good working order, and do not want to be inadvertently surveilled.

Response P702-11 As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response J, Gondola Design and Operations, of the Final EIR, each cabin would have a security camera on board with feed to a control room. Routine cabin maintenance would be performed by the system operator. The use of security cameras in the cabins is consistent with Metro’s use of security cameras on its public transit systems. The security cameras used in cabins can be selected to balance the need for monitoring and recording activity inside the cabins with minimizing recording the details of activity outside of the cabins, including on private property. In addition, the security cameras in each cabin could be angled to minimize the area outside of the cabin that is captured in the recording, similar to the angle of cameras in Metro’s buses shown in this image:



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While inapplicable to the proposed Project, Metro’s Records Management Policy prohibits Metro from releasing video camera surveillance recordings to the public, which may only be viewed by authorized Metro employees, and by law enforcement, upon request.²⁵ Similarly, the Emergency Operations Plan for the proposed Project would include policies and procedures so that the video recordings from the proposed Project’s cabin security cameras are not releasable to the public and only viewable by authorized employees, and by law enforcement, upon request to designated system safety and security personnel.

Comment P702-12 We are concerned and skeptical about the ability of the battery charging system of the gondola cabins to maintain power to all of the proposed systems in the cabins that require electricity. To our knowledge, the systems that will run off of the cabins’ battery power include the security cameras, WIFI for video streaming and audio communications, lighting, smart glass, air circulation/ filtration, seat heating, and air

²⁴ Garcia, Sid. 2014. Metro buses get multi-camera video surveillance systems. Available at: <https://abc7.com/metro-bus-video-recording-camera-system-surveillance-cameras/143396/>. Accessed September 2023. See also Los Angeles County Metropolitan Transportation Authority (LA Metro). 2020. Public Transportation Agency Safety Plan. Available at: https://libraryarchives.metro.net/DB_Attachments/200401_Attachment%20B%20-%20PTASP.pdf. Accessed September 2023.

²⁵ Los Angeles County Metropolitan Transportation Authority (LA Metro). 2010. Records Management Policy.

conditioning (which at the October 22, 2022 Zoom DEIR meeting was said to be “anticipated”). Here are some of our questions related to the electrical in-cabin systems that we hope will be addressed in the next draft of the EIR:

Response P702-12 This comment provides a general introduction of comments P702-13 through P702-15. Responses P702-13 through P702-15 are provided below.

Comment P702-13 Will the smart glass be the first system to be sacrificed if the battery power drops below a certain level? How often could this happen? Would this be likely to happen during heat waves due to the electrical load from the air conditioning system?

Response P702-13 Refer to Section 2.0, Project Description, of the Draft EIR, and Topical Response J, Gondola Design and Operations, for discussion of how power for the proposed Project 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. The power in each cabin would supply the cabin amenities, which require electrical power in all anticipated temperatures.

Comment P702-14 How much energy does the air conditioning draw at various outdoor temperatures, and at what outdoor temperatures would The Gondola system be required to shut down for safety reasons?

Response P702-14 Refer to Response P702-13 for discussion of cabin power. The proposed Project would be operable in all anticipated temperatures and would adhere to applicable active weather alerts.

Comment P702-15 According to LA ART, the batteries powering the gondola cabins would be recharged mechanically via wheels that are attached to the gondola cabins, turning on the track ropes. We ask that LA ART explain in the EIR how this recharging system works. Realistically, how much energy can be generated from the wheels?

Response P702-15 Refer to Response P702-13 for discussion of cabin power. Refer to Topical Response J, Gondola Design and Operations, for discussion of how power for the proposed Project 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.

Comment P702-16 How does The Gondola affect our rights to privacy on our private property? There are certain rights that individuals have on private property that they do not have in public. Will the privately owned gondola guideway in the air be deemed a public right-of-way? What is the legal framework for protecting residents’ privacy rights on their private property when a private project invades it like this? These include the rights to not be video recorded. Do we lose these rights to privacy on our private property

if the smart glass is malfunctioning? Are residents restricted in terms of messages and signage on their private property that can be seen from The Gondola, but is not visible from our public streets?

Response P702-16 The proposed Project would be located in a densely populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses. As discussed in Topical Response M, Comparable Urban Aerial Transit Systems, modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. The applicable legal framework is consistent with this practical reality of modern urban life, and the proposed Project would not affect any privacy rights on private property. There is no applicable state or federal statute governing privacy rights between private parties in the land use context. And the United States Supreme Court has said, in analogous situations, that there is no reasonable expectation of privacy in this type of context. As discussed in Section 2.0, Project Description, of the Draft EIR, an objective of the proposed Project is to maximize the proposed Project's alignment along the public ROW and publicly owned property and minimize aerial rights requirements over properties. To the extent that the proposed Project is in proximity to private properties, it does not infringe on the reasonable expectation of privacy of these private property owners. And, as discussed in Section 2.10, Required Permits and Approvals, of the Draft EIR, the Project Sponsor would seek discretionary entitlements, reviews, and approvals from Caltrans, State Parks, the City, and Metro to establish and authorize aerial rights for the proposed Project, as well as any agreements required with private property owners for aerial rights for portions of the proposed Project that are not over public ROW or publicly-owned property. Refer to Response P702-9, for discussion of how cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views. Refer to Response P702-11 for discussion of how the proposed Project would include security cameras and would implement video privacy and retention measures. The proposed Project would not impose restrictions on residents in terms of messages or signage on their private property.

Comment P702-17 Noise / Vibration

Many homes in our neighborhood are over 100 years old and don't have soundproofing. Homes have plaster walls and single pane windows. And as mentioned in the visual impacts analysis, many of our homes have security bars on the windows. Many of our homes were built before air conditioning existed – with plaster walls, high ceilings, and basements that help keep our homes cool in the summer. We don't have air conditioning or can only afford to use it sparingly, and need to leave windows open at night in the summer for cooling. With the added noise and disturbance of this project, you will force many of us to keep our windows closed and use air conditioning, which is not an environmental benefit of this project.

Response P702-17 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would maximize the alignment along the public ROW and publicly owned property and minimize aerial rights requirements over private properties. As shown in Table 3.13-26 on page 3.13-58 of the Draft EIR, operational noise impacts of the proposed Project would be less than significant. Refer to Responses GO17-129 and Response GO17-130 for discussion of the proposed Project's less than significant impact on human health associated with hearing loss, hearing damage, and sleep disturbance. As noted on page 2-51 in Section 2.0, Project Description, of the Draft EIR, construction activities would be limited to daytime hours, pursuant to the Los Angeles Municipal Code. Therefore, the proposed Project would not result in nighttime construction impacts.

Comment P702-18 The DEIR states that the maintenance of The Gondola system will be at night, between midnight and 6am. This will create significant noise that is not included in the noise analysis. Would power tools be required to service the Broadway Junction? If so, it could sound like an open-air auto mechanic's shop in our neighborhood at night. Would we hear workers shouting at each other? We are not aware of any urban gondola systems that place open-air stations in the middle of residential neighborhoods. We believe the Broadway Junction needs to be redesigned to be a fully enclosed non-passenger station.

Response P702-18 Like the Broadway Junction, most standard aerial gondola stations are designed to be open and cannot be fully enclosed, as the ropes and cabins are required to pass through the building. 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 how maintenance would include observation of the overall system as part of the startup routine for system safety. Maintenance for the proposed Project would include maintenance of cabins, daily inspections, minor repairs, and major repairs. The proposed Project cabins would be primarily serviced overnight at the subterranean cabin maintenance area below the Dodger Stadium Station. Maintenance activities in the Broadway Junction are expected to be limited primarily to maintenance of the Broadway Junction itself and would include daily inspections, minor repairs, and major repairs. Daily inspections would be conducted by the system operator and would not be associated with any noise generating equipment. Periodically, minor repairs may be needed based on these daily inspections. Work associated with minor repairs would be limited. Any major repairs to or replacement of large capital equipment at the Broadway Junction would be performed during planned outages and would occur on an infrequent basis. For instance, the drive motor is estimated to have a ten-year or greater life cycle and would be replaced as part of a planned outage. 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. Such comparable aerial transit systems include open air stations in residential areas.

Comment P702-19 The noise and vibration analysis is vague and flawed. For example:

- Noise measurements were conducted between June 15 and June 18, 2020 – during the COVID-19 pandemic stay-at-home orders when traffic was light. As acknowledged in the DEIR, this underestimates the noise measurements that established the baseline or existing noise in the neighborhood, which in turn, underestimates the total noise once The Gondola Project’s noise is added to the existing noise. It’s quite possible that the operational noise at NSR-17 would be pushed above the unacceptable levels for single family homes on Savoy Street once this correction is made.

Response P702-19 As discussed on page 3.13-18 of Section 3.13, Noise, of the Draft EIR, “during the time when the noise measurements were conducted for this analysis (June of 2020 for all measurements except ML-22, which was conducted on May 11, 2022), local traffic volumes were anticipated to be somewhat lower than normal due to COVID-19 pandemic restrictions. While no comparative traffic data was available to confirm this observation, an informal comparison of measured noise levels to previously measured noise levels for other technical studies in similar locations during pre-COVID conditions show that the previously measured noise levels were up to 3 dBA higher. As such, as discussed on page 3.13-19, measured ambient noise levels represent a conservative noise impact assessment.

A lower ambient noise measurement results in a conservative assessment because noise is measured using the dB scale, which is logarithmic, not linear, and therefore sound levels are not added or subtracted through ordinary arithmetic. For instance, two sound levels 10 dB apart differ in acoustic energy by a factor of 10. An increase of 10 dBA is generally perceived as a doubling in loudness. When two identical sources are each producing sound of the same loudness, the resulting sound level at a given distance would be 3 dBA higher than one source under the same conditions.²⁶ Alternatively, the proposed Project would need to generate a noise level equal to ambient conditions to result in a 3 dBA increase, and the proposed Project would need to generate a noise level greater than ambient conditions to result in a greater than 3 dBA increase in noise. Therefore, the use of a lower ambient measurement would reflect a greater increase in noise from proposed Project operations. Put another way, for the same noise source the increase over ambient is larger when compared to a lower ambient. When that same noise source is compared to a higher ambient, the increase over ambient will be smaller. Since noise is analyzed as an

²⁶ Federal Highway Administration (FHWA). 2017. Noise Fundamentals. Available at: https://www.fhwa.dot.gov/Environment/noise/regulations_and_guidance/polguide/polguide02.cfm. Accessed August 2023.

increase over ambient conditions use of a lower ambient results in a more conservative analysis. For instance, with respect to the CNEL analysis, as shown in Table 3.13-11 on page 3.13-20 of the Draft EIR, the ambient noise level at NSR 17N (Low-Rise Residential – North (on Savoy Street)) and NSR-17S (Low-Rise Residential - South (on Savoy Street)) is 59.3 CNEL. As shown on Table 3.12-22 on page 3.13-54 of the Draft EIR, combined operational noise from the proposed Project would be 58.9 CNEL at NSR 17N and NSR-17S, resulting in an ambient plus project level of 62.1 dBA CNEL, which is an increase of 2.8 dBA and less than the 5 dBA allowable increase.

As discussed above, measured noise levels for other technical studies in similar locations during pre-COVID conditions show that the previously measured noise levels were up to 3 dBA higher (Page 3.13-18 of the Draft EIR). Assuming that ambient noise at NSR 17N and NSR-17S is 3 dBA higher than what was measured ($59.3 + 3 = 62.3$), the Project would result in a lower increase of 1.6 dBA versus 2.8 dBA. Both conditions would remain below the 5 dBA allowable increase. Accordingly, if a higher ambient had been used the Project would not result in the exposure of NSR 17N or NSR-17S to unacceptable noise levels. In fact, the analysis shows that if a higher ambient had been used the increase over existing would have been lower. As such, the lower measured ambient noise levels represent a conservative noise impact assessment and the use of a lower ambient noise level in the analysis would not result in unacceptable noise levels.

Comment P702-20 Another NSR location at 455 or 451 Savoy Street should be included in the noise analysis because this is where the noise from the Broadway Junction may be the highest in the neighborhood during operation of The Gondola, according to the Rossi model. The construction noise would also be higher at 455 or 451 Savoy than at NSR-17N because there are no structures between these two locations.

Response P702-20 As discussed in Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, a noise survey was conducted to establish existing noise conditions in a variety of locations throughout the proposed Project area, focusing on areas of existing or future noise-sensitive receptors, including single-family residential (SFR) areas, multi-family residential (MFR) areas, parks, schools, and other outdoor areas of frequent human use. In the area of Savoy Street, measurements were taken at ML-20 (430 Savoy Street) to establish existing ambient noise levels. As explained on page 3.13-18 of the Draft EIR, ML-20 is representative of other noise-sensitive receptors located further from busy streets. The existing ambient noise levels from ML-20 were then used to evaluate noise impacts at NSR 17N (Low-Rise Residential – North (on Savoy Street)) and NSR 17S (Low-Rise Residential South (on Savoy Street)). Accordingly, NSR 17N was selected as a representative sensitive receptor for all the residential on Savoy Street to the north and therefore includes both 455 and 451 Savoy Street. As demonstrated in Response P702-19, the use of a lower ambient noise level as the basis of the analysis is conservative. ML-20 is located further from Broadway and Bishops Road, resulting in lower ambient measurements

than if noise was measured along the roadway. Accordingly, use of ML-20, which is located further from Broadway and Bishops Road results in a conservative analysis for NSR 17N and NSR 17S. NSR 17N and NSR 17S show the range of impacts that would occur on Savoy Street. This representative analysis was conducted instead of establishing existing ambient noise levels and modeling impacts at approximately 14 different residential uses along Savoy Street. The construction and operations analysis at NSR 17N and NSR 17S shown in the Draft EIR at Tables 3.13-17, 3.13-18, 3.13-22, 3.13-23, 3.13-24, and 3.13-25 provides the range of impacts that would occur to sensitive uses along Savoy Street including both 455 and 451 Savoy Street. Accordingly, NSR 17N and NSR 17S are representative sensitive receptors for all the residential on Savoy Street, including 455 and 451 Savoy Street.

Comment P702-21 These noise measurements in our neighborhood on Savoy Street were taken at 430 Savoy Street. This location may underestimate the noise from the 110 FWY because the property is partially shielded from the freeway noise by the elevated terrain of Radio Hill. We suggest an additional measurement location at 455 Savoy Street or across the street from that address on Savoy Street.

Response P702-21 As discussed in Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, NSR 17N (Low-Rise Residential – North (on Savoy Street)), as shown in Figure 3.13-5, Noise Sensitive Receptor Map, on Page 3.13-21 of the Draft EIR, encompasses 455 and 451 Savoy Street. Therefore, impacts have been addressed at 455 and 451 Savoy Street. As demonstrated in Response P702-19, the use of a higher ambient noise level would result in a lower Project impact. The use of a lower ambient noise level as the basis of the analysis is conservative and is not an underestimation of impacts. Pursuant to the LA CEQA Thresholds Guide, noise impacts would occur if project construction or operation would be greater than 5 dBA over ambient conditions (threshold = ambient + 5 dBA). The use of a potentially lower ambient noise level in the analysis of NSR 17N would result in lower thresholds; as such the analysis is conservative.

Comment P702-22 The noise analysis does not identify by name the gondola system that was measured for reference, only noting that the system is in Austria and can be found in Appendix A.

Response P702-22 Refer to Topical Response P, Gondola System Noise Modeling, for discussion of the noise model used to predict noise levels from operations of the proposed Project. As provided therein, the reference noise levels in Appendix L, 3S Sound Measurements Memo, of the Final EIR were taken in Tyrol, Austria at the Stubai Glacier. The system is known as the Eisgratbahn gondola.

Comment P702-23 The noise analysis does not identify differences between the 3S gondola system in Austria that was measured and The LA ART Gondola project that is proposed. The analysis does not make any adjustments to the estimated sound levels of The Gondola to account for these differences. The analysis makes the assumption that the sound

power parameter, L_{wsf} , for the 3S gondola in Austria, The Koblenz Seilbahn, is the same as that for the proposed LA ART Gondola, and that the same parameter can be used for intermediate, angle/junctions, and end stations. We have the following questions about their estimate of LA ART's operational noise:

Response P702-23 Refer to Topical Response P, Gondola System Noise Modeling, for discussion of the noise model used to predict noise levels from operations of the proposed Project and an explanation of how the noise model equations were validated by measurements from the Tyrol 3S gondola system, which is similar to the proposed Project. The Tyrol 3S gondola system used for validation includes similar system mechanics as the Broadway Junction; specifically, it includes an above-ground drive motor and bullwheel as well as a return bullwheel. 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. In addition, the Tyrol 3S system was operating at the same speed as the proposed Project at 6 meters/second and has a similar cabin capacity. Accordingly, no adjustments were needed to utilize the Tyrol 3S gondola system for validation.

Comment P702-24 Were the measurements taken from the gondola station in Austria taken from a station that included the drive motor or was it taken from one with a passive bullwheel? Where the measurements taken while the gondola was operating at maximum capacity?

Response P702-24 Refer to Topical Response P, Gondola System Noise Modeling, and Response P702-23, for discussion of the noise model used to predict noise levels from operations of the proposed Project including an explanation that the Tyrol 3S gondola system used for validation includes an above-ground drive motor and bullwheel as well as a return bullwheel at the station where noise measurements were taken. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the operational noise impacts from the proposed Project, which would be less than significant. The impact analysis included an evaluation of potential operational noise impacts resulting from the gondolas passing close by occupied buildings, including sensitive uses. As noted on page 3.13-27, this analysis assumed that the gondola cabin was operating with 40 people inside, which is the maximum cabin capacity. Based on this assumption, as provided on pages 3.13-57 and 3.13-58 of the Draft EIR the impacts from gondola cabin noise would be less than significant. Accordingly, the Draft EIR added an analysis that accounted for a maximum cabin capacity in addition to the passengers that may have already been included in the underlying equations and measurements.

Comment P702-25 Is the drive motor for The LA ART Gondola underground, like the gondola in Austria?

Response P702-25 Refer to Topical Response P, Gondola System Noise Modeling, and Response P702-23, for discussion of the noise model used to predict noise levels from operations of the proposed Project including an explanation that the analysis conservatively used

equations associated with an underground gondola system because the sound power levels of the underground gondola system were higher than the tensioning system. The Tyrol 3S gondola system used for model validation includes an above-ground drive motor and bullwheel as well as a return bullwheel, similar to the proposed Project's Broadway Junction.

Comment P702-26 What are the differences in characteristics between the reference drive motor and The Gondola's drive motors that may impact noise levels and vibration? Does the capacity of the gondola system impact the sound power parameter, Lwsf? If the system in Austria is the Koblenz gondola, that system has a much lower capacity.

Response P702-26 Refer to Topical Response P, Gondola System Noise Modeling, and Responses P702-23 and P702-24, for discussion of the noise model used to predict noise levels from operations of the proposed Project. As discussed therein, the Draft EIR's assessment of noise impacts does not utilize noise data from the Koblenz 3S system. Instead, the model was validated with the Tyrol 3S gondola system which has a cabin capacity similar to the proposed Project. Refer to Response P702-24 for discussion of how the Draft EIR noise analysis included an evaluation of the maximum capacity of cabins.

Comment P702-27 In the noise analysis, it states that one of the assumptions is as follows: "The proposed Project includes one junction. The junction is a non-passenger junction used to execute a turn in the ropeway (while the junction includes vertical circulation elements, which are for maintenance). Acoustically, it was assumed that the junction would have the same power unit as the stations and was modeled using the same equations and parameters as the stations." We don't believe this is a good assumption. The junction and intermediate stations contain twice as many components for circulating the cabins. In addition, the Broadway junction contains both a motor unit and a tensioning system.

Response P702-27 Refer to Topical Response P, Gondola System Noise Modeling, and Responses P702-23 and P702-24, for discussion of the noise model used to predict noise levels from operations of the proposed Project. As explained therein, 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.

Comment P702-28 What are the differences in the build and natural environment of the reference gondola and The Gondola that is proposed that would impact the propagation of sound from this system? If the reference system is the Koblenz gondola in Austria, that system is surrounded by a flowing body of water and open space that may diffuse, scatter, or absorb noise. However, the alignment of The LA ART Gondola is in an area that is undergoing redevelopment and will likely see further midrise and high-rise developments in the next 40 years. Future development along Alameda Street could propagate the noise from The Gondola's Alameda Station and Chinatown State Park Station via a well-known "urban canyon effect."

Response P702-28 Refer to Topical Response P, Gondola System Noise Modeling, for discussion of the noise model used to predict noise levels from operations of the proposed Project. As explained therein, the Draft EIR's does not utilize noise data from the Koblenz 3S system; the Draft EIR model was validated based on the Tyrol 3S system. 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.

The comment also raises concerns regarding the potential for a future “urban canyon effect.” CEQA does not require speculation as to possible future environmental consequences, and the Draft EIR need not analyze uncertain, hypothetical future events. Nevertheless, an examination of potential future “urban canyon effects” was conducted for informational purposes. In outdoor noise evaluations the “urban canyon effect” occurs where there are sound reflective surfaces in close proximity to the noise source. For instance, if there were rows of high-rise buildings located along the proposed Project alignment it could contribute to an increase in noise levels due to sound reflection. Currently, there are no high-rise buildings, continuous or in parallel, along the proposed Project alignment that may cause an “urban canyon effect” based on the review of the proposed Project alignment and current building layouts; the tallest building along the proposed Project alignment is a 10-story building at the corner of Alameda Street and Alpine Street. All other buildings are 6-stories or less. A 10-story building is lower than the elevation of ropeway (approximately 175 feet above ground). Furthermore, based on review of the related projects discussed in Section 5.0, Other CEQA Considerations, of the Draft EIR, there are two proposed related projects with high-rise buildings (up to 26 stories). However, these proposed 26-story buildings are not parallel with any other high-rise buildings. Therefore, potential noise impacts associated with an “urban canyon effect” would not occur. Nevertheless, a 3-D acoustics model was created to evaluate the potential noise increase assuming there would be a new high-rise building (taller than the gondola ropeway) along the proposed Project alignment that have not yet been considered or proposed.²⁷ Based on the analysis, in the event that there are new high-rise buildings located along the proposed Project alignment, an estimated noise increase of approximately 1.3 dBA due to the canyon effect could occur. However, the estimated noise increase would not result in a significant impact.

Comment P702-29 We suspect that one or more of the large trees between our neighborhood (on Savoy Street) and the 110 FWY will need to be removed due to the height of the trees interfering with the path of the gondola cabins. The EIR needs to confirm whether any trees will be removed or pruned, and account for increase in freeway noise in the neighborhood due to the removal or modification of trees for this project.

²⁷ Acoustical Engineering Services (AES). 2023. Noise Calculation Worksheets, Urban Canyon Effects Calculations.



Large Trees Potentially in the Path of The Gondola Cabins/Cables Between 455/451 Savoy and SR-110 (110 FWY)



Large Trees East of SR-110 Northbound Lanes, Inside the Onramp Loop

Response P702-29 The Tree Inventory Report, included as Appendix B to Appendix E, Biological Resources Assessment, of the Draft EIR, details the number and types of trees along the proposed Project alignment. As discussed in Appendix K.1, Updated Tree Report, 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, as well as to remedy certain counting errors. The overall number of inventoried trees and number of protected trees required for removal remain the

same as the original Tree Inventory Report, and the overall numbering for trees within the inventory remains the same. As shown in the Tree Location Exhibit (Exhibit A) and detailed in Table 7 of the Tree Inventory Report, a total of 8 trees are located within the portion of the proposed Project alignment over SR-110. Of those 8 trees, 5 will be removed (tree # 131-132, 136-138) and 3 will be preserved (# 133-135). The tree shown in the first and third photos is tree #134, which will be preserved, and the tree shown in the second photo is tree #138, which will be removed. Noise sensitive receptors along Savoy Street (NSR 17N, NSR 17S) are located approximately 465 feet from the SR-110 mainline. According to the California Department of Transportation Technical Noise Supplement,²⁸ it is uncommon for noticeable noise reduction to be achieved with trees and vegetation (Section 2.1.4.4) with Caltrans research indicating that landscaping along highways account for less than 1 dBA of reduction. Although trees and vegetation can contribute to noise reduction, the effectiveness of tree barriers vary based on the density and width of vegetation. Reductions of 6 to 10 dB can be achieved where a dense belt of trees combined with shrubs are 15 and 30 meters wide (approximately 50 to 98 feet wide) and reductions of 5 to 10 dB can be achieved with a dense belt of trees only (with no shrubs providing ground cover) between 15 and 30 meters wide (approximately 50 to 98 feet wide).²⁹ Based on an aerial view of the area within the SR-110 NB on-ramp loop, the tree canopy width between the 110 and NSR 17N and NSR 17S is approximately 16 meters (55 feet) wide at this location and are not of sufficient density or width to effectively reduce noise from SR-110 for the noise sensitive receptors along Savoy Street (NSR 17N, NSR 17S). Due to the distance and sparseness of the vegetation the depicted vegetation is not anticipated to provide appreciable reductions in traffic noise from the SR-110 and the removal of trees #131-132 and #136-138 would not result in increased ambient noise at NSR 17N or NSR 17S.

Comment P702-30 Even with mitigation, the construction noise at NSR-17S is estimated at 80 to 90dB without mitigation and approximately 70-80dB with mitigation. This is outrageous.

Response P702-30 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the construction noise impacts for the proposed Project at Broadway Junction. Implementation of Mitigation Measure NOI-A would be required to minimize impacts during all construction phases at NSR 17N (Low-Rise Residential – North (on Savoy Street)) and NSR 17S (Low-Rise Residential – South (on Savoy Street)); however, construction impacts at NSR 17N and NSR 17S would remain significant and unavoidable during all construction phases. As provided by Mitigation Measure NOI-A, for the entire duration of construction of Broadway Junction, the proposed Project would provide a 24-foot temporary noise barrier between the construction site and NSR 17 (Low Rise Residential), in addition to NSR 13 (Future

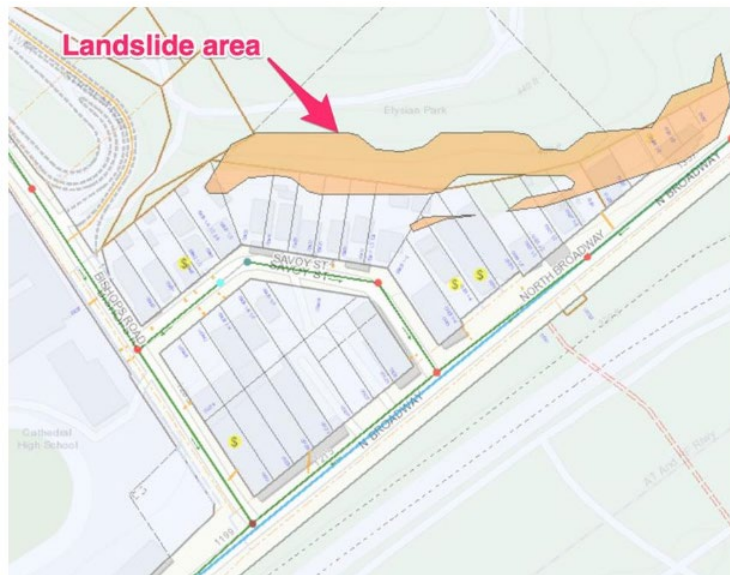
²⁸ California Department of Transportation (Caltrans). 2013. Technical Noise Supplement to the Traffic Noise Analysis Protocol Section 2.1.4.4. Available at: <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf>. Accessed August 2023.

²⁹ Dobson, Martin & Jo Ryan. 2000. Trees & Shrubs for Noise Control. Available at: <https://www.trees.org.uk/Trees.org.uk/files/8c/8c69f212-a82e-424b-96d1-c8ff6dc02403.pdf>. Accessed March 2023.

Development), NSR 14N (Los Angeles State Historic Park - North). In addition, 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 at Broadway Junction. While the temporary platforms are installed, the proposed Project shall provide a 10-foot temporary noise barrier on the temporary platforms between the construction site and NSR 17, in addition to NSR 13, NSR 14N, and NSR 16.

Comment P702-31 The vibration caused during construction of the Broadway junction's foundation may cause damage to our homes. There are also retaining walls in our 100+ year old hillside neighborhood that were build prior to current building codes that may be damaged and cause instability to our hillsides. Most of the properties on the west and north side of Savoy Street are in a landslide area. We are concerned that the Radio Hill hillside could become unstable during construction of the junction and trigger a landslide.

Response P702-31 As discussed in Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, construction activities at the Broadway Junction would not exceed the vibration damage thresholds at any vibration-sensitive receptors, and the impact would be less than significant for building damage. Refer to Section 3.07, Geology and Soils, of the Draft EIR, for discussion of the potential for landslides withing City-designated hillside areas. As discussed on page 3.7-17, the proposed Project would be constructed in accordance with applicable standards, requirements, and building codes. Mitigation Measure GEO-A requires the preparation of a site-specific geotechnical investigation and report which would include geotechnical recommendations for project design and construction based on grading conditions and foundation capacities, and recommended measures such as site stabilization to reduce potential impacts related to potential ground failures induced by the proposed Project. With compliance to existing standards and codes and implementation of Mitigation Measure GEO-A, impacts related to unstable soils, landslides, lateral spreading, subsidence, liquefaction, or collapse during construction of the proposed Project would be reduced to less than significant.

Comment P702-32**Landslide Area Near the Broadway Junction (NavigateLA)**

We are also concerned that vibration from construction on the Broadway Junction could cause structural damage to our old infrastructure including sewer pipes, sewer laterals, water mains and gas lines. The sewer lines under Savoy Street were installed in 1896 and 1906. Two spot repairs were made on the sewer pipe along Broadway in 2008. We did not see this impact addressed in the DEIR.

Response P702-32 As discussed in Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, construction activities at the Broadway Junction would not exceed the vibration damage thresholds at any vibration-sensitive receptors, and the impact would be less than significant for building damage. The maximum level of vibration of 0.59 inches per second (in/sec) peak particle velocity (PPV) is considered the maximum level of intermittent or transient vibration acceptable for old underground services/buried pipework.³⁰ The analysis in the Draft EIR shows that the highest project construction vibration levels associated with construction of the Broadway Junction at VSR-17 (Low-Rise Residential (on Savoy Street) (includes 451, 437, and 438 Savoy Street) would be 0.17 in/sec PPV at 438 Savoy Street (Table 3.13-28 on page 3.13-63). 0.17 in/sec PPV is well below the maximum acceptable level for old underground services/buried pipework. As construction vibration is well below the acceptable level for old underground services/buried pipework, structural damage to infrastructure including sewer pipes, sewer laterals, water mains and gas lines would not occur from proposed Project construction. Additionally, the City of Los Angeles has a proactive and preventive maintenance program for its sewer

³⁰ NZ Transport Agency. Assessment of Environmental Effects for the Basin Bridge Project, Wellington Northern Corridor RoNS. Available at <https://www.epa.govt.nz/assets/FileAPI/proposal/NSP000026/Applicants-proposal-documents/5f29d30124/AEE-Chapter-16.pdf>. Accessed August 2023.

system that responds to and prevents potential damage.³¹ Therefore, construction on the Broadway Junction is not anticipated to damage existing utility infrastructure.

Comment P702-33 Measurements taken in the Savoy Street neighborhood were taken at 430 Savoy Street, which is partially shielded from the 110 FWY noise by the upslope of Radio Hill behind the homes on Savoy Street. Residences closer to Bishops Road may experience slightly higher freeway noise. A better measurement site, where the maximum noise would be highest in the neighborhood would be at Bishops and Savoy Street.

Response P702-33 As discussed in Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, noise measurement locations were selected to represent noise-sensitive receptors (see Draft EIR Section 3.13.3.1, Existing Noise Conditions). The noise measurement locations were selected to represent ambient conditions at the noise-sensitive receptor locations along the proposed Project alignment. Noise measurement locations were selected to attain the ambient levels and avoid influence from other sources (including roadway noise freeways) in order to avoid artificially increasing ambient levels. The measurement of ambient noise at a major roadway intersection would inaccurately reflect the ambient noise levels for residences located further from the intersection. Refer to Response P702-19 for discussion of how the use of a lower ambient noise level as the basis of the analysis is conservative.

Comment P702-34 We request that these issues be clarified and investigated in relation to the noise and vibration analysis: In addition, the City and other agencies should be looking for ways to help our communities reduce the noise in our neighborhoods that is a result of the freeway traffic and historical redlining, instead of introducing additional sources of noise that nudge us closer to levels that are incompatible with residential land use.

Response P702-34 This comment provides a general conclusion regarding the noise and vibration comments raised in Comments P702-17 through P702-33. Responses to the noise and vibration comments contained in this letter are provided in Responses P702-17 through P702-33. 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 uses.

Comment P702-35 Safety/Security

Because there is still no funding plan and no operation plan, we are concerned that this system will not be properly maintained and secured by this private operator. We

³¹ City of Los Angeles. 2015. Sewer System Management Plan. Available at: <https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/M216.pdf>. Accessed August 2023.

are concerned about the cavalier attitude with which LA ART is approaching the challenge of maintaining and securing this system. LA ART does not acknowledge the risks that are being imposed on residents, users of this system, and the general public in right-of-ways under The Gondola.

Response P702-35 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. Refer also to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, for discussion of how aerial transit systems such as the proposed Project represent one of the safest modes of transportation relative to other forms of transit. Routine cabin maintenance would be performed by the system operator. 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, operators would be present at each station and in control rooms to monitor activity throughout the proposed Project.

Comment P702-36 We are concerned about harm that could be caused by vandalism or sabotage of the system, as happened with the Sea to Sky Gondola. The operators of that gondola had to completely revamp their security after a vandal cut their cable on two occasions in just over a year. The operators admitted that security cameras are worthless if no one is monitoring them. How many security cameras will be used to monitor the LA ART Gondola system, and how many people will LA ART employ to monitor all of these security cameras? Will they be monitored 24/7 to prevent acts of sabotage? How much staff will really be needed to operate and maintain this system? The cables of gondola systems are very thick steel; a falling cable could kill a person, as almost happened in the Sea to Sky Gondola case (<https://unofficialnetworks.com/2022/09/15/sea-to-sky-reward-doubled/>). This is a huge concern for residents who would live under the gondola's path.

- <https://www.cbc.ca/news/canada/british-columbia/sea-to-sky-gondola-vandalism-update-2022-1.6582667> Operators of the gondola stepped up security after the cable was cut the first time and the attraction now has an in-house security team with tech for around-the-clock surveillance.”
- <https://vancouver.sun.com/news/local-news/security-company-sued-in-connection-with-sea-to-sky-gondola-vandalism> “They say USI assured them it would equip the system with sufficient cameras and equipment so as to provide coverage of all of the gondola’s towers to detect unauthorized access and which would trigger an alarm in the event of a vandal approaching the scene.”...”As a result of the security breach and the alarm failure, the vandal was able to sever the cable, which parted catastrophically. The loss event caused substantial damage and destruction to the gondola and its components.”
- <https://www.squamishchief.com/local-news/sea-to-sky-gondola-to-reopen-with-own-security-team-3839149>
 - Brown said having an in-house security team makes a significant difference.
 - “You can have the highest tech stuff on the planet, but if you don’t have a team that’s constantly attuned to what that information is telling you about your situation, then it’s not really worth a lot,” he said.
 - It’s essential to have security personnel familiar with local topography, the community, and how circumstances change according to time of day and seasons, he said.
 - “I can’t tell you how many security cameras out there that are recording footage that nobody ever watched,” said Brown. “You need to be alive to the situation minute-by-minute. And that takes people that care about it. And that’s the difference, right there...we now have a team whose – not just their hob – but... passion is looking after the Sea to Sky Gondola.”
- The vandal still has not been caught. All they have is a blurry thermal image. This suggest that better lighting is needed for security, which may impact light pollution.

Still no arrests since gondola cable was severed in 2019 and 2020; reward for info doubled to \$500K

BC News · Posted: Sep 14, 2022 9:42 AM PDT | Last Updated: September 15, 2022



3.C. RCMP have released a thermal image of the suspect, circled in red, who they believe severed the Sea-to-Sky Gondola cable in 2019 and 2020. (B.C. RCMP)

Response P702-36 In British Columbia, Canada, the Sea-to-Sky Gondola experienced vandalism on two occasions when an individual deliberately severed the system cable. While no injuries were reported from either incident, both of which occurred outside of operating hours, there was equipment damage. While vandalism is not unheard of in aerial transit, it is highly uncommon. Moreover, the scale of the damage to the Sea-to-Sky Gondola is an exception in the industry and makes clear that the incident was carried out by an individual with clear intention to cause such damage. The individual would have had to know the terrain well enough to traverse it at night, be physically fit, be equipped with powerful tools, and possess the ability and knowledge to use these tools to sever the cable without harming themselves. Refer to Topical Response J, Gondola Design and Operations, for discussion of how the proposed Project 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 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. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world that operate safely, efficiently, and in concert with nearby residential and open space uses.

Comment P702-37 We are also concerned about the security inside the gondola cabins for users of the system. What kind of liability will this create by packing every gondola cabin full with 40 people for a full two hours before and after every Dodger Stadium game and event? Will the capacity need to be reduced to better manage security? If so, this could drastically change the estimates of GHG emissions reductions. According to a report from the City of Gothenburg, “When catastrophic accidents occur, such as that in

Singapore, it is generally a result of third parties who failed to adhere to policies and/or who were negligent. This suggests that while a cable car operator can implement policies and procedures to safeguard a cable car, operators must also be proactive and engage with all relevant stakeholders.”

(https://www2.trafikkontoret.goteborg.se/resourcelibrary/underlagsrapport_best-practices.pdf). Also, “However, since each city has its own unique security circumstances, the city should conduct extensive consultations with relevant local stakeholders. This may determine the level of risk that could be anticipated aboard a cable car and in turn, inform the security settings required on a cable car to make passengers feel safe.” This is why we question LA ART’s commitment to safety and security when they claim that The Gondola will be safe because they will follow all applicable regulations and safety protocols. There is a well documented history of fights at Dodger Stadium and in the parking lots.

- “Jaime was knocked unconscious as another man punched him in the face. Jaime, who is a grandfather, said he and his wife were leaving the Elton John concert when someone in a group smacked his rearview mirror. According to the grandfather, when he got out of the car to ask, a woman punched him shortly before other men started beating him.”(<https://www.cbcnews.com/losangeles/news/lapd-promising-more-arrests-in-beating-of-couple-outside-elton-john-concert-at-dodger-stadium/>)
- “Rafael Reyna’s Los Angeles Superior Court lawsuit alleges negligence, premises liability, assault, battery and intentional infliction of emotional distress. He maintains lighting was poor and security was lacking at the 2019 game.”(<https://kfiam640.iheart.com/featured/la-local-news/content/2022-05-17-dodgers-want-proof-of-beating-victims-wifes-emotional-distress-claim/>)
- “Filed in Los Angeles Superior Court, the suit notes Dodger Stadium has a higher crime rate than any other ballpark. This is not the first time the team has come under legal proceedings due to security issues. A civil trial of Giants fan Bryan Stow, who was brutally attacked outside of the stadium in 2011, resulted in a judgement against the team in 2014.”(<https://dodgersway.com/2020/04/24/dodgers-news-fan-sues-team-over-2019-beating-at-dodgers-stadium/>).
- In August 2021 there was a peak in violence at Dodger Stadium, mostly related to assaults and alcohol. (<https://xtown.la/2021/09/22/dodger-stadium-crime/>).
- The Gondola project needs a security plan that is custom designed for the elevated security risk at Dodger Stadium after a game or event. 2022 was another record year (<https://xtown.la/2022/12/09/crime-unusual-places-golf-course-cemetery-dodger-stadium/>)

Response P702-37 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 how the proposed

Project is equipped with security features. Attendants would be present at each station, and 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. To provide added security to system 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. The Emergency Operations Plan for the proposed Project would also include emergency response protocols and safety procedures developed in conjunction with the operator, system provider, and local authorities, and 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 would include communication protocols with local authorities for further instruction and coordination. The proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). Refer to Topical Response K, Signage and Lighting, for discussion of the proposed Project’s signage and lighting, with additional technical detail and information provided in the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR. As explained on page 68 of the Lighting Study the cabin lighting level was selected to ensure that the cabins would provide a comfortable and safe interior illumination.

Comment P702-38 LA ART must present an operational plan. In real life, gondola systems often cannot operate at or near their rated capacities. The 3S system in Bolzano, Italy is one example. For various reasons, including compact station design and comfort/ease of passenger loading, that system operates at a capacity of approximately 500 people per direction per hour with 3-to-4-minute headways, which is much lower than its maximum capacity. This gondola system also has notoriously long lines and poor passenger circulation inside the station. They allow their cabins to come to a full stop at the stations by default during boarding and deboarding, which is not the case for The LA ART Gondola.

[\(https://www.gondolaproject.com/2010/07/29/the-bolzano-3s-funivia-del-renon-part-3/\)](https://www.gondolaproject.com/2010/07/29/the-bolzano-3s-funivia-del-renon-part-3/)

Response P702-38 Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, for discussion of how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). 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 a cabin is factored into the overall system capacity of the proposed Project. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of how comparable gondola systems in cities around the world operate at their design capacities. Additionally, refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of how queues would be managed by efficient vertical circulation and by staff at the station.

Comment P702-39 If a person with mobility issues wants to board, how will they make the request to a station attendant? There are many monolingual Chinese speakers in Chinatown. Will there be interpreters at the stations? How will that station attendant stop the gondola cabin? How long can a cabin be stopped without causing the entire gondola system to come to a halt? How does this impact boarding for all of the other cabins in the station? Because the cabins do not come to a full stop by default, this suggests that the boarding area will be a chaotic free-for-all which would be very unsafe, especially if the stations do not have adequate space for boarding. The constant movement of the cabins means more space is needed for boarding.

Response P702-39 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. Refer to Section 2.0, Project Description, of the Draft EIR and Topical Response J, Gondola Design and Operations, for discussion of how the station boarding process and cabins would comply with all accessibility requirements of the Americans with Disabilities Act (“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 a cabin is factored into the overall system capacity of the proposed Project. Pathways to 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.

Comment P702-40 The dim, underseat lighting of the cabins at night is a security problem. Security video will not be as clear, and in a crowded cabin, the darkness increases the likelihood of accident or injury. People may be more likely to bump into each other and start fights. Would this dark lighting be acceptable on Metro’s buses or trains?

Response P702-40 Refer to Topical Response J, Gondola Design and Operations, for discussion of operational safety. Refer to Topical Response K, Signage and Lighting, and Response P702-57A for a discussion of the proposed Project's cabin lighting. Light levels would ensure safe and comfortable operation of the cabins consistent with Metro policies and recommended practice for transit systems.

Comment P702-41

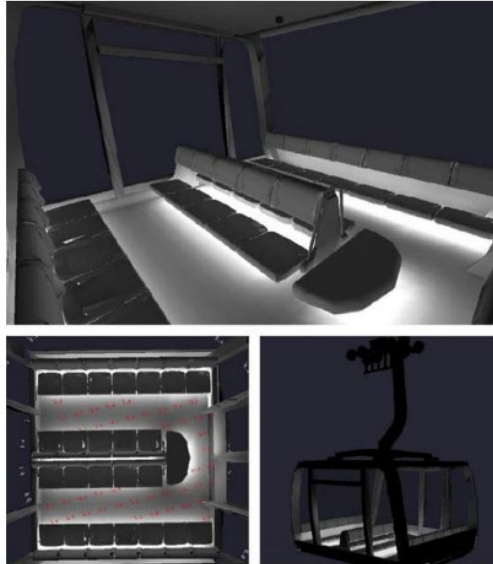


Image from DEIR Appendix C – Visual Impact Analysis / Lighting Design

There needs to be greater consideration for security of the gondola infrastructure to prevent unintended uses of the system. If the opening of the Sixth Street Viaduct is any indication, the absence of ladders will not prevent people from climbing the towers and stations. If a person is able to get access to the Dodger Stadium parking lot or the Broadway Junction, would they be able to use The Gondola as a zip line?

<https://www.nbclosangeles.com/news/local/sixth-street-bridge-arches-boyle-heights-downtown-la/2944212/>

Response P702-41 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 how the proposed Project 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. Additionally, it is anticipated that system towers would include anti-climb design features.

Comment P702-42 What would prevent an individual from prying open the doors of a gondola cabin and jumping out for whatever reason? This happened on the Peak2Peak gondola in 2014.

(<https://www.cbc.ca/news/canada/british-columbia/base-jumpers-condemn-illegal-whistler-peak-2-peak-stunt-1.2534544>)

Response P702-42 As discussed in Section 2.0, Project Description, of the Draft EIR, each cabin of the proposed Project would have a set of two sliding doors that open and close automatically under safety controls in stations. The cabin doors would be equipped with a locking mechanism to prevent their opening other than at designated points along the proposed Project alignment. Additionally, 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.

Comment P702-43 During the summer months, the gondola cabins, with its large windows that do not open, will be like greenhouses. Will people be able to open the windows in an emergency, and if so, won't that allow people to throw items outside of the cabin that could harm people, such as cigarettes, bottles, and trash? Will the vents for air circulation in the cabins include holes that are large enough for a cigarette?

Response P702-43 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.

Comment P702-44 After a breakdown of the Roosevelt Island Tram on April 18, 2006 that left 69 people trapped for 11 hours

(<https://www.nytimes.com/2006/04/20/nyregion/options-were-limited-after-a-power-surge.html>), the tram was required to keep an emergency kit, including blankets, a toilet, and a privacy curtain inside the cabin in case of breakdown. The tram broke down after a power surge. The backup system had been out of service for a while. The tram, however, has an attendant. Will the gondola cabins have an emergency kit that includes a toilet and will the emergency kit be accessible? How will the kit be kept secure without an attendant on board each cabin?

Response P702-44 The cabins are not anticipated to have such an emergency kit, which are not typical for urban gondola systems. As discussed in Section 2.0, Project Description, of the Draft EIR, backup power for the proposed Project 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. Refer to Topical Response J, Gondola Design and Operations, for discussion of how 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).

Comment P702-45 The Broadway Junction is within an earthquake liquefaction zone, methane zone, and within the fault zone of the Upper Elysian Park earthquake fault. We are concerned that there are too many risks associated with building an junction station at this location.

Response P702-45 Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR and Appendix F, Memo on Structural Engineering, of the Final EIR for discussion of how the proposed Project would meet applicable standards, requirements, and building codes and would have less than significant impacts related to geology and soils, including liquefaction and seismic related ground failures, upon implementation of Mitigation Measure GEO-A. Refer to Section 3.09, Hazards and Hazardous Materials, of the Draft EIR for discussion of how, with adherence to OSHA, Cal/OSHA, and Division 71 of the Los Angeles Municipal Code, the proposed Project would have less than significant impacts related to methane gas exposure or release.

Comment P702-46 Visual Impacts

The Gondola Project's enormous towers will cause visual impacts in our neighborhood. We are concerned that the towers will obstruct views. This project also introduces too much cold and bare concrete into our historic neighborhoods. We already have enough concrete from the elevated Metro L Gold Line. We do not need more.

Response P702-46 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's towers, which would be less than significant, and for visual simulations of the proposed Project's towers. The Alameda Tower's modern architectural style is evident and would complement the buildings within The California Endowment. The neutral light-tone gray color scheme of Alameda Tower was designed for consistency with the surrounding urban environment, and to not distract from visually distinct structures such as the United States Post Office Terminal Annex building. Alpine Tower would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and their design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. Stadium Tower would consist of an architectural design that provides visual lightness to the form to complement the existing buildings in this area. In addition, the neutral light-tone gray colors and material finishes of the Stadium Tower was selected to complement the surrounding urban environment, and to not distract from existing visually distinct structures, such as Dodger Stadium. Refer to Topical Response C,

Project Features, discussing how the proposed Project’s design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area.

Comment P702-47 We have previously been told that the Broadway Junction would be 78 ft high, then 84 ft high, and now 98 ft high. This non-passenger station will block our neighborhood’s Downtown skyline views and give them to this private company and their gondola customers. This project blocks out much more of the views than the mixed-use, residential project that was previously approved for the site at the Broadway Junction, 1201 N Broadway. That residential project concentrated the height and bulk of the building along Broadway and stepped down the height of the development closer to Savoy Street. The Junction does not do this.

Response P702-47 Refer to Section 2.5.1.4, Broadway Junction, Figure 2-20: Broadway Junction Cross Sections, and Table 2-2: Proposed Project Station and Junction Details Section 2.0, Project Description, of the Draft EIR, for details regarding the Broadway Junction. Broadway Junction is a non-passenger junction 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. As discussed on Section 5.0, Other CEQA Considerations, of the Draft EIR, the previously approved mixed-use redevelopment at 1201 North Broadway is included as a related project. The 1201 North Broadway project involves the construction of a new seven-story mixed use building on the corner of North Broadway and Bishops Road. 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, which would be less than significant. As identified on pages 3.1-12 and 3.1-13, under the LA CEQA Thresholds Guide, visual impacts are assessed based on changes to views from publicly accessible locations or public views. Reference to analysis of residential views and resident viewer groups are provided only for informational purposes.

Comment P702-48 The gondola cars will be used for advertising and electronic billboards. The DEIR only says that they will abide by Metro and City regulations for signs. What messages would the private developer be allowed to display all over our communities for their private gain? Will our communities be subject to advertisements from authoritarian governments that violate human rights, as a platform for self-promotion and propaganda during the Olympics? What other types of objectionable, offensive, or harmful messages could become regular sights on gondola cabins over LA State

Historic Park and our neighborhoods because of this project, which would operate 18 hours per day? Online gambling, liquor, cryptocurrencies, advertising of luxury brands? Who would decide what is acceptable? How would this be regulated?

Response P702-48 Refer to Topical Response K, Signage and Lighting, for a discussion of the proposed Project's signage. No digital signage is proposed on the exterior of the cabins. Regarding sign content, the 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. Nevertheless, 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. 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.

Comment P702-49 The shadow study does not consider the impacts of shadows from the gondola cabins. If there are gondola cabins leaving every 23 seconds, there could be a gondola cabin passing over a particular point along the path every 12 second, which could cast a flickering shadow on a person who is in their yard, sitting in the park, or sitting at home. This type of flickering would be a significant nuisance. For much of the day, large portions of the southern half of the park could be rendered useless for peaceful enjoyment.

Response P702-49 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, which would be less than significant. Refer to pages 3.1-53-3.1-56 for specific results related to visual operational impacts related to shadows. The shade/shadow study included in Appendix C, visual Impact Assessment, of the Draft EIR, focuses on station, tower, and junction structures because those structures would result in longer, predictable shadows on surrounding uses. As the gondola cabins would be moving and would only result in shadows that pass briefly over any particular area, thresholds in the LA CEQA Thresholds Guide would not be exceeded by the cabins. 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.

Comment P702-50 A major issue for aerial transport is flying over homes, and yet in this 8,000 page draft EIR, there is no image that shows what it looks like over our homes. There are only two images that include a glimpse of the apartment building (438 Savoy Street) next door to the Broadway Junction. The only views are facing the Broadway Junction. There should be renderings that show the gondola cabins as they pass over our homes.

Response P702-50 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, which would be less than significant. As identified on pages 3.1-12 and 3.1-13, under the LA CEQA Thresholds Guide, visual impacts are assessed based on changes to views from publicly accessible locations or public views. Reference to analysis of residential views and resident viewer groups are provided only for informational purposes. Refer to Appendix H.1, Memo Regarding Preparation of KOPs, of the Final EIR, for discussion of the methodology used to prepare the visual simulations included in Appendix C, Visual Impact Assessment, of the Draft EIR. While it is impractical to simulate every location, additional simulations for public consideration are included in Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for an evaluation of the updated and additional KOPs for the proposed Project which would not result in significant impacts, and the aesthetic impacts of the proposed Project would remain less than significant.

Comment P702-51 LA ART claims The Gondola's cables over LA State Historic Park would not be significantly more impactful to views than the Gold Line's overhead catenary wires. We disagree. The Gondola cables are much thicker and hang directly over greenspace of the park.

Response P702-51 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 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. 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, which would be less than significant. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including visual simulations to provide additional clarity regarding ropeway cable design for the gondola cabins. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for an evaluation of the updated and additional KOPs for the proposed Project which would not result in significant impacts, and the aesthetic impacts of the proposed Project would remain less than significant. Refer to Appendix H.1, Memorandum Regarding Preparation of Key Observation Points, of this Final EIR, for a discussion of how the view simulation renderings were prepared, noting that while the ropes would be 1.75 to 2.5 inches in diameter, this size is too small to be visually detectable in many of the view simulation renderings, and accordingly the ropes were modeled with a 6-inch diameter so that they would be visible.

Comment P702-52

P702-52A



DEIR Image of Chinatown / State Park Station at LASHP with Notes

- Throughout this document are misleading images that downplay the visual impacts of The Gondola project by omission. For example:
 - Only showing two gondola cables in each direction, instead of three. This was in many of the renderings.
 - Omission of gondola cabins in images.



DEIR Image of Chinatown / State Park Station at LASHP with Notes

In this DEIR, The Gondola is never shown operating at full capacity. The main purpose of this system is to relieve traffic for Dodgers games, which LA ART claims can be helped by operating at maximum capacity for a full two hours before and after Dodgers games and events. But in all of the images, there are no lines, the stations are almost empty, the cabins are empty or only have 6 or 7 people (15% capacity). These images do not accurately reflect the challenge of operating this system. These images also do not accurately reflect the real-life challenges of accessing and using this system as a gondola customer.

P702-52B

Draft EIR does not show where any of the jumpers would be. Jumpers are the large metal contraptions attached to the gondola cables that keep the cables a safe distance apart. They are a safety device that are a part of other 35 gondola systems. Are they not needed in The Gondola project? If they are needed, where would they hang over LA State Historic Park and our neighborhoods? The cables are very thick and noticeable, but the jumpers are bulky and even more noticeable.



Workers performing repairs on Toulouse 3S Teleo Gondola, which suffered several breakdowns during the first month of service.

Response P702-52

P702-52A

Refer to Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, for additional visual simulations of the proposed Project, including a depiction of the system operating at maximum capacity with passengers within the cabins, as well as visual clarification on the dimensions and spacing of the ropeway cables and spacing of the slack carriers that maintain clearance between the three ropes that comprise the ropeway. Updates were made to the visual simulations where it appeared only two ropes were visible instead of three. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for an evaluation of the updated and additional KOPs for the proposed Project which would not result in significant impacts, and the aesthetic impacts of the proposed Project would remain less than significant. Refer to Appendix H.1, Memorandum Regarding Preparation of Key Observation Points, of this Final EIR, for a discussion of how the view simulations were prepared, noting that while the ropes would be 1.75 to 2.5 inches in diameter, this size is too small to be visually detectable in many of the view simulation renderings, and accordingly the ropes were modeled with a 6-inch diameter so that they would be visible. Refer to Section 3.01 Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, for additional information regarding the choice of KOP locations and vantage points.

P702-52B

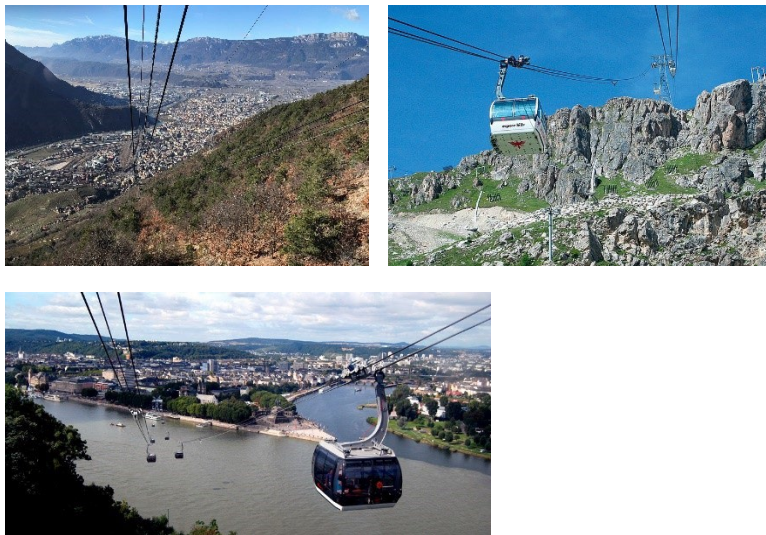
The image included in Comment P702-52B appears to be from an article in “Le Parisien;” the caption underneath the image in the article explains, in French, that “the operators of Altiservice, the operator of Téléo [aerial transit system in Toulouse], checked the jumpers [slack carriers], these metal parts which maintain the distance between the cables.”^{32, 33} 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”). 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 350-500 feet with adequate separation from the stations,

³² Périé, Paul. 2022. À Toulouse, une maintenance spectaculaire pour le téléphérique Téléo. Available at: <https://www.leparisien.fr/haute-garonne-31/a-toulouse-une-maintenance-spectaculaire-pour-le-telepherique-teleo-10-08-2022-E0FH5CXWIBDSDEG6FP6KSK5XJE.php>. Accessed August 2023.

³³ Google Translate. Available at: <https://translate.google.com/?sl=auto&tl=en&text=les%20op%C3%A9rateurs%20d%E2%80%99Altiservice%2C%20l%E2%80%99exploitant%20de%20T%C3%A9l%C3%A9o%2C%20ont%20notamment%20v%C3%A9rifi%C3%A9%20les%20cavaliers%2C%20ces%20pi%C3%A8ces%20m%C3%A9caniques%20qui%20maintiennent%20l%E2%80%99%C3%A9cartement%20entre%20les%20c%C3%A2bles&op=translate>. Accessed September 2023.

junction, and towers. The slack carriers of one gondola lane can be staggered from or aligned with the adjacent lane.

Included below are photographs of slack carriers used in comparable aerial transit systems.³⁴ In addition, refer to Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, which includes supplemental KOPs illustrating representative slack carriers for the proposed Project. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for an evaluation of the updated and additional KOPs for the proposed Project which would not result in significant impacts, and the aesthetic impacts of the proposed Project would remain less than significant.



Comment P702-53 The DEIR includes many misleading images that downplay the visual impacts of The Gondola project by using “forced perspective”.

³⁴ Clockwise from top left:

Gric, R. & Nejez, J. 2017. The 3S Gondola Lift Is 25 Years Old. Available at: <https://en.isr.at/singleview-en-old/article/the-3s-gondola-lift-is-25-years-old>. Accessed August 2023.

Dale, Steven. 2017. The Koblenz Rheinseilbahn, Part 1: Introduction. Available at: <https://www.gondolaproject.com/2010/09/13/the-koblenz-rheinseilbahn-part-1-introduction/>. Accessed August 2023.

SCJ Alliance Consulting Services. 2023. Photograph of Funivia del Renon.



Use of forced perspective with tourist attractions like the Leaning Tower of Pisa is popular in tourist photography

- Forced Perspective – Rendering of towers on Alameda



Image from DEIR – Towers on Alameda Street

- Forced perspective – Broadway Junction



Figure 5-25: Existing and Simulation Views of KOP 22 – Looking Northeast on North Broadway from Cottage Home Street

Image from DEIR – Broadway Junction viewed on Broadway. The 98 ft tall Broadway Junction is hidden in the background and made to look smaller than the 40 ft tall utility pole.

- Forced perspective – Chinatown / State Park Station



Figure 5-13: Existing and Simulation Views of KOP 12 – Looking North on Alameda Street/Spring Street from South of College Street

Image from DEIR – Chinatown / State Park Station in the background

- Also figures 5-14, 5-20b, 5-21, 5-22, 5-24 are taken from deceptively far away from the subject, to make the towers or stations look small.

Response P702-53 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, which would be less than significant. As discussed in Section 3.01, identification of potential aesthetic and visual impacts included the identification of Landscape Units (LU) that defined particular viewsheds and/or aesthetic settings within the Project area, as well as Key Observation Points (KOPs) within each LU that are representative of the visual character of the area. KOPs within each LU were selected based on existing knowledge of important viewsheds and through consultation with responsible agencies. Visual simulations were created to showcase the pedestrian eye level vantage point within photographs and, as such, visual elements in the foreground of the KOP will appear larger than visual elements further in the distance even though the foreground element may be of a smaller dimension, consistent with how pedestrians experience their surrounding environment. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, for KOPs and simulations updated in part to provide additional aesthetic and visual illustrations. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for an evaluation of the updated and additional KOPs for the proposed Project which would not result in significant impacts, and the aesthetic impacts of the proposed Project would remain less than significant. Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR for additional information regarding the choice of KOP locations and vantage points. Refer to Appendix H.1, Memo Regarding Preparation of KOPs, of the Final EIR, for discussion of the methodology used to prepare the KOPs.

Comment P702-54 There is a significant visual impact of the gondola station at the entrance of LA State Historic Park and the gondola cabins as they travel in and out of that station over the park, which is not shown or discussed in the visual impact assessment. The DEIR should show a rendering of this site. This site is the end of the stream (or river) that runs along the eastern edge of the park. This stream fills up and flows during heavy rains. There is also an art installation/monument at this site, called “Origins” by Debra Scacco. This is just north from where LA ART is proposing to build restrooms and concessions.

- “Origins” – “Works by Debra Scacco explore the notion of place. Her LA River works explore the unique history of the river, and the role it has played in shaping modern-day Los Angeles.”



Photos of River and Art Inside the Southern Entrance at LASHP

Response P702-54 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, which would be less than significant. The Draft EIR and Visual Impact Assessment both specifically addressed and disclosed potential impacts on changes in the visual environment and existing viewsheds into and from within the Los Angeles State Historic Park. The Draft EIR included thirty Key Observation Points (KOPs), including nine that simulated views of or from Los Angeles State Historic Park. 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.

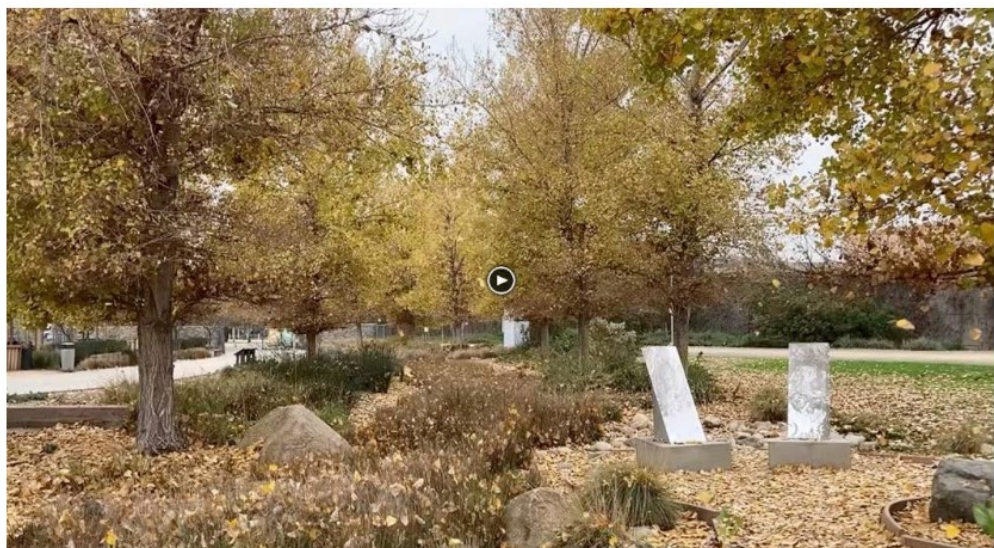
The Draft EIR concluded that the proposed Project would not adversely impact or interfere with key viewpoints or the visual character of the park.

Nevertheless, 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 View Simulations, and Appendix H.2, Supplemental KOPs in Response to Comments, of this Final EIR, for a discussion of the supplemental KOPs' preparation and the supplemental KOPs, respectively. As demonstrated by these supplemental

KOPs, 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 as shown in the simulated views. In addition, refer to Appendix H.2, Supplemental KOPs in Response to Comments, which includes 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. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for an evaluation of the updated and additional KOPs for the proposed Project which would not result in significant impacts, and the aesthetic impacts of the proposed Project would remain less than significant. As noted on page 16 of Appendix E, Biological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, of the Draft EIR, “The BSA does not include water features falling under CDFW jurisdiction.” 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 Los Angeles State Historic Park, including reducing the size and scale of the station, integrating the existing historic granite pavers, and carefully considering the optimal location for the station.

Comment P702-55

- The visual impact of cutting down the trees at the entrance of the park and building restrooms and concessions at the entrance is not addressed. This is a very picturesque portion of the park. Also, what is the visual impact of the gondola cabins casting shadows over people who are trying to enjoy their portion of the park?



Inside the Southern Entrance at LASHP

Response P702-55 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, which would be less than significant. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including the concessions and restrooms at Los Angeles State Historic Park. Refer to Section 5.0, Corrections and Additions, of this Final EIR, for an analysis of the Supplemental KOPs in Response to Comments, which confirmed the Draft EIR determination that aesthetic impacts of the proposed Project would be less than significant. Refer to the shade/shadow analysis for the proposed Project included in Appendix C, Visual Impact Assessment, of the Draft EIR. Refer to Response P702-49 for discussion of the cabin shadow, which would be less than significant.

Comment P702-56 The visual impact of the large gondola station sitting in front of the southern/pedestrian entrance of the park seems out of place, unwelcoming, and intimidating. It seems like bad Feng Shui.



Response P702-56 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. 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. 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, which would be less than significant. The aesthetic impact of the Chinatown/State Park Station is discussed as part of the discussion of Landscape Unit (LU) 3. The Chinatown/State Park Station would consist of a neutral light-tone gray color scheme that would provide visual

lightness to the form and their design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. In addition, the new amenity building intended for use by LA ART riders and park visitors alike was designed to reflect the scale and materiality of the existing visitor amenity buildings located within the Los Angeles State Historic Park. Refer to the KOP Figure Mapbook included in Appendix C, Visual Impact Assessment, of the Draft EIR, for visual simulations of the Los Angeles State Historic Park prepared to identify the anticipated changes to key viewpoints, including the southern entrance at the park. The simulations and analysis concluded that higher quality views would experience only limited impacts, and that views would still be available from other more prominent locations within/of the park. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, which includes additional KOPs of the park. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for an evaluation of the updated and additional KOPs for the proposed Project which would not result in significant impacts, and the aesthetic impacts of the proposed Project would remain less than significant.

Comment P702-57**P702-57A**

Cabin lighting as shown in the lighting plan is too dark. When everyone is sitting down, it will be fully dark. Overhead lighting inside the cabins is needed for many reasons:

- Safety and security reasons, especially after Dodgers games and events. A lot of fights start when people are drunk and bump into each other, for example, after the Elton John concert, Brian Stowe, etc.
- If a fight breaks out in a gondola cabin and it is almost pitch black, what's going to happen. The video system is the onboard security system, but the video quality and clarity is much lower in darkness.
- In a packed cabin that is dark, how hard will it be to find and press the emergency call button to talk to security? This is a huge safety liability.

P702-57B

- If you are adding overhead lighting in the cabins, then people may not be able to see the city light views at night. How will that impact revenue for the gondola from tourists? This will need to be factored into any funding plan for the gondola project.
- Would Metro allow buses and trains at night to be pitch black except for underseat lighting? We don't think so. This raises the question: Is this project transit or is it a tourist trap?

Response P702-57**P702-57A**

Refer to Topical Response K, Signage and Lighting, for a discussion of the proposed Project's cabin lighting. As discussed on page 55 of the Lighting Study, which is

included in Appendix C, Visual Impact Assessment, of the Draft EIR (and within the Lighting Study Appendix A: Building Lighting Concept Plan), 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 Concept Plan, the illuminance design standards for the 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 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 downlighting that would be used to increase the cabin lighting levels during loading and unloading and in emergency situations. 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 how the proposed Project is equipped with security features. For example, to provide added security to system 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. The Emergency Operations Plan for the proposed Project would also include emergency response protocols and safety procedures developed in conjunction with the operator, system provider, and local authorities, and would address operational changes and communication protocols required in response to a range of potential emergencies. 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 authorities for further instruction and coordination.

P702-57B

Refer to Response P702-57A and Topical Response K, Signage and Lighting, for a discussion of the proposed Project's cabin lighting. Light levels would ensure safe and comfortable operation of the cabins consistent with Metro policies and recommended practice for transit systems. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled

operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Comment P702-58 Graffiti – There needs to be a plan to manage graffiti on The Gondola, including the cabins, towers, and stations. After the opening of the 6th Street Viaduct, LA City Council had to approve an extra fund, approximately \$700,000 for one year of graffiti abatement.

- LA Magazine: “Members of the Los Angeles City Council found themselves debating whether events at the Sixth Street Bridge are why we just can’t have nice things – weighing a proposed \$706,000 for graffiti removal and repair for a public works project not yet one month old, ABC7 reports. The stately arches of the 6th Street Viaduct, which connected Boyle Heights with the Arts Districts, attracted more than oohs and ahs since opening on July 10. Increasingly daring pedestrian and vehicular adventurers began to converge on the Instagram magnet to pull stunts, burn rubber, tag up, or make their mark in other ways.”

<https://www.lamag.com/citythinkblog/now-the-6th-street-bridge-will-cost-l-a-700k-in-graffiti-clean-up/>

Response P702-58 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 safety features of the proposed Project and how maintenance would be performed by the operator and would include daily observation of the overall system as part of the startup routine. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P702-59 The gondola built in Rio for the Olympics closed permanently only weeks after the closing of the 2016 Olympic games

(<https://wired.com/story/rio-de-janeiro-favela-cable-car-gondola/>). The visual impact of this project, should it be built and subsequently run out of funding, would be huge. Safeguards must be in place if the project fails or the applicant decides that they will no longer operate and maintain it. Not only would the structures be an embarrassment and an eyesore, an abandoned system would fall into disrepair and pose a safety hazard. Should this project be approved despite all of our communities’ concerns, there must be a substantial surety bond paid entirely by LA ART that will guarantee that every part of this project can be removed from our neighborhoods without costing taxpayers.

Response P702-59 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. 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. 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. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project. CEQA does not require speculation as to possible future environmental consequences, and the Draft EIR need not analyze uncertain, hypothetical future events.

Comment P702-60 Traffic / Transportation

The neighborhood around Savoy Street already experiences a lot of traffic and is a heavily accessed corridor. There is traffic from Cathedral High School, both everyday student pickup & drop-off and special events. There is traffic from people accessing the 110 FWY Stadium Way onramp and offramp. There is also traffic from Dodger Stadium games and events. On a typical game day, the traffic starts backing up on Bishops Road approximately 30 minutes before the game. For special or sold out games, the backup usually starts 1 hour before the game. For special events or opening day, the traffic can start backing up into our neighborhood 2 hours before the game. As residents, we are accustomed to planning around the Dodger traffic. We never thought we would have to think about the traffic flying over our heads.

Response P702-60 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. 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 including on Bishops Road and Savoy Street. 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, including Bishops Road, arterial roadways, and freeways during game and special event days.

Comment P702-61 The Gondola Project does not make sense as a transit solution for Dodger Stadium games and events. It will simply displace traffic further into our neighborhoods and cause traffic jams around the gondola stations. It will worsen air quality impacts from tailpipe emissions in an already overburdened community.

Response P702-61 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 Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. 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 including Savoy Street, 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.

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 the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. Nevertheless, the proposed Project does not include a station in the vicinity of the Savoy Street neighborhood. By providing an alternative mode of travel for game and event attendees at Dodger Stadium, vehicular traffic destined to and from the Dodger Stadium property, including vehicles using Bishops Road or Savoy Street to obtain access to the Dodger Stadium Downtown Gate, would be reduced.

Comment P702-62 What happens if there are extra innings? Will The Gondola system be allowed to operate later than 12am or will there be only bus service in that case? If people do not want to ride the Dodger Stadium Express bus, they may take a rideshare, which would increase traffic in our neighborhoods. If the games end later than 10 or 10:30, many people who LA ART expects will take the gondola after the game to access transit at Union Station would need to take rideshare home because buses and trains stop operating at around midnight.

Response P702-62 As detailed in Section 2.0, Project Description of the Draft EIR, 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, including to extend the hours of operation if necessary to account for extra innings. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queueing at stations, and pre-game and post-game transportation. The limited operation of the regional transit system at LAUS in the evening is a condition faced by riders of the Dodger Stadium Express today, and the approximate 8 percent reduction in post-game riders of the Dodger Stadium Express on weekday evenings compared to pre-game is factored into the proposed Project's ridership model. The Project Sponsor would coordinate potential improvements to late night service with Metro, Metrolink, and other transit service providers.

Comment P702-63 A UCLA Mobility Study came to a different conclusion than the Traffic Study/ VMT Analysis in the DEIR. "Transportation researchers from the University of California Los Angeles (UCLA) used a state-of-the-art transportation simulation based on a Nobel-Prize winning model and found that the gondola has limited impact – less than 1% - in reducing traffic on major roads around Dodger Stadium on the night of a sold-out game. They also found that far fewer passengers would likely get to the gondola via public transit connections than LA ART claims. Without reducing traffic and increasing

public transit connections, the gondola does little to change our air quality and reduce greenhouse gas emissions.”

(<https://www.stopthegondola.org/ucla-study>) The UCLA Study’s findings appear more in line with common sense.

Response P702-63 Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. 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:

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

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 travel. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project’s ridership model which is based on extensive data sources and assumptions validated by data. Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR.³⁵ 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.

Comment P702-64 We are concerned about the bus stop at Bishops Road and Broadway. Where would the bus stop be relocated during construction and where is the pedestrian access to the bus stop? The bus stop is used by residents and some Cathedral High students.

Response P702-64 Bus stops at Broadway and Bishops Road are currently located on the northwest side of Broadway northeast of Bishops Road and on the southeast side of Broadway southwest of Bishops Road serving the LADOT Lincoln Heights/Chinatown DASH and Metro Line 45. Potential effects of the construction of the Broadway Junction on

³⁵ Stantec. 2023. Memo to Holly Rockwell Regarding Los Angeles Aerial Rapid Transit (LA ART) Project Transportation Analysis Peer Review.

these bus lines is discussed on pages 50 and 51 of the *Los Angeles Aerial Rapid Transit Project Non CEQA Transportation Assessment*.³⁶ As discussed in the Assessment, during construction of the Broadway Junction, these routes would need to be rerouted during the deck construction (two weeks) and deck removal (three weeks). Given the size of LADOT DASH buses, the DASH route could be rerouted to bypass the closure using Savoy Street, Bishops Road, and Cottage Home Street, with the existing bus stops at Broadway and Bishops Road relocated to Bishops Road and Savoy Street. Given the larger size of Metro buses, two options are suggested for providing continued service for Metro Line 45 during this time: (1) operating smaller buses on the line bypassing the closure using Savoy Street, Bishops Road, and Cottage Home Street; or (2) rerouting the line to Spring Street, with a temporary on-demand van service or Uber/Lyft vouchers provided for residents and employees of the area along Broadway, as well as Cathedral students, who rely on Metro Line 45 local service along Broadway to connect with the detoured route during the five weeks of detour.

Comment P702-65 If the GHG emissions reductions were calculated using overall trip length to Dodger Stadium, with an average trip length of miles. The Gondola, however, only operates a 1.2-mile route. The VMT calculated should only include the 1.2 miles between Union Station and Dodger Stadium. The only transit it would provide is the 1.2 miles between the Alameda Station and Dodger Stadium, or the .6 miles between the Chinatown/State Historic Park Station and Union Station. The Gondola has no control over whether people will use transit to access the gondola stations. The mode share evaluation is based on the faulty assumption that there will be no wait times at the gondola stations. The estimates that only 25% will drive or use rideshare is based on faulty comparison to Crypto.com arena data. Transfers need to be taken into consideration. Crypto.com arena has direct access to rail, which has a shorter wait time than The Gondola. For many of the riders at Crypto.com, they do not need to make a transfer to another form of transit. For The Gondola, everyone who doesn't live in Chinatown or the Union Station area will need to make a transfer, which includes riders who live in the 90012 zip code which extends into the Downtown LA Civic Center.

Response P702-65 Refer to Section 3.17, Transportation, and Appendix N, Ridership Model Development, of the Draft EIR, and Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. The proposed Project is expected to attract new transit riders connecting to the proposed Project at LAUS or the Chinatown Metro L Line (Gold) Station. As discussed on page 3.17-34 and shown in Table 3.17-4 in Section 3.17, Transportation, of the Draft EIR, riders would access the proposed Project via

³⁶ Fehr & Peers. 2022. Los Angeles Aerial Rapid Transit Project, Non CEQA Transportation Assessment. Since this report concerns non-CEQA effects of the Project, it is not required to be included in the Draft EIR or Appendix N to the Draft EIR. The report was made available for public review in September 2022 on the project's SB 44 website, which is linked via Metro's LA ART website and is available at the following link: <https://laartsb44.net/#!/documents>.

bus transit, rail transit, private automobile, rideshare, bicycle, and walk. Of these, the estimated non-auto mode of access of 67.5%. For any riders who would be new transit riders using the regional transit system to travel to and from LAUS, the VMT reduction was correctly calculated for the entire length of what had been a vehicle trip to and from Dodger Stadium, not just the 1.2-mile length of the proposed Project alignment.

The comment states that the mode share evaluation is based on a faulty assumption that there will be no wait times at the gondola stations. This is not accurate. As shown on page 5 of Appendix N, Ridership Model Development, of the Draft EIR, total travel time including transfer time was included in the modeling for travel between LAUS and Dodger Stadium for both the Dodger Stadium Express and the proposed Project.

The comment states that the estimate that 25% will drive or use rideshare to obtain access to the Project was based on a comparison to Crypto.com arena data. As described on page 8 and in the table following page 22 of Appendix N, Ridership Model Development, of the Draft EIR, the estimated mode of access to the proposed Project was determined through a review of data provided by Metro for the Dodger Stadium Express, and was 26%. Additionally, as detailed on page 22 of Appendix N, Ridership Model Development of the Draft EIR, for a conservative analysis the driving mode of access for the additional 20% of choice riders was assumed to be 65%, resulting in a total driving mode of access for the proposed Project of 32.5%.

Comment P702-66 Most of Metro’s Transit (bus and rail) stops at midnight. If the gondola operates until midnight, what happens if a game goes into extra innings?

Response P702-66 Refer to Response P702-62 for a discussion of post-game transportation.

Comment P702-67 Construction road closures are significant in Chinatown, which is already burdened with traffic during rush hour, and when there is a major event at Dodger Stadium of LA State Historic Park. In our neighborhood on Savoy Street, we also have traffic from special events and daily student drop off and pick up at Cathedral High School. Fire and paramedic access would be compromised during road closures for construction.

Response P702-67 A detailed discussion of emergency access during construction is provided on pages 3.17-45 to 3.17-66 in Section 3.17, Transportation of the Draft EIR, including the evaluation of potential impacts on emergency services. Proposed Project construction would occur in various phases, which would have different effects on the street system. Section 3.17 details anticipated construction period work areas and temporary traffic handling measures such as temporary lane configuration changes. Mitigation Measure TRA-B requires implementation of a Construction Traffic Management Plan (“CTMP”), including street closure information, detour plans, haul routes, and a staging plan. 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 must be reviewed and approved by the City of Los Angeles. The CTMP requires the proposed Project to coordinate with the City and

emergency service providers to ensure emergency access is provided to the proposed Project alignment and component sites and neighboring businesses and residences. With implementation of Mitigation Measure TRA-B, impacts to emergency access would be less than significant.

Comment P702-68 The Elton John concert ending at 11:15 pm. Would The Gondola have shut down at midnight in that case? Would concerts at Dodger Stadium be required to end at 10 pm?

Response P702-68 As detailed in Section 2.0, Project Description of the Draft EIR, it is anticipated that the proposed Project would provide daily service between 6:00am to 12:00am, subject to operational changes in response to ridership demand, including to extend the hours for concerts and other events at Dodger Stadium.

Comment P702-69 After construction is finished, would the same road closures be needed to replace major equipment in the elevated stations, including the Broadway Junction which is an elevated, 98ft tall non-passenger station? Cranes would be needed to replace major equipment, and where would they be sited? Where would the equipment be staged? What is the frequency with which major maintenance would be needed even in the best case scenario in which there are no major equipment failures.

Response P702-69 As discussed in Section 2.0, Project Description, of the Draft EIR, within the stations and junction, overhead bridge cranes would allow the insertion or removal of equipment as may be required for maintenance activities. Maintenance activities may require temporary lane closures for trucks or crane trucks to lift equipment. Maintenance activities, including equipment replacement, would not necessitate the same road and lane closures as those necessary for the construction of the proposed Project.

Comment P702-70 It looks like the Broadway Junction would be built close to the property line on Bishops Road. This is already a problem area, as there is no sidewalk on this side of the road even though it is an official route to Dodger Stadium.



Official Route to Dodger Stadium at Bishops Road – No Sidewalk on One Side

If the gondola has a malfunction, thousands of people may choose to walk down from the Dodger Stadium gondola station from the Downtown Gate, onto Stadium Way and then walk along this route on Bishops Road, using the gondola cables as reference for how to get back to Union Station. There need to be wide sidewalks on this route versus the narrow, unmaintained sidewalks, or non-existent sidewalks. Even on Broadway, the sidewalks are mostly narrow until you get to Golden Dragon.



Sidewalks on Stadium Way Towards Downtown Gate

Response P702-70 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 how the proposed Project is unlikely to become inoperable due to a system malfunction. The proposed Project system would incorporate redundancies and robust designs to minimize the possibility of mechanical failures. 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. The proposed Project would also include routine maintenance that would be performed by the system operator, and the overall system would be observed on a daily basis as part of the startup routine. Additionally, the proposed Project would include the installation of backup battery storage at each station, tower, and junction, as needed, to provide backup power to allow unloading of the system in the event of a power grid failure. Finally, the Emergency Operations Plan of the proposed Project would include procedures to be followed in the unlikely event that the proposed Project becomes inoperable for an extended period of time. In such a scenario, pedestrians at Dodger Stadium could be routed via the Downtown Gate to Stadium Way to the existing pedestrian bridge over State Route 110 (SR-110) to the Metro L Line (Gold) Station, and if necessary, traffic control officers could be relocated to this route to facilitate pedestrian travel and safety. This route is shorter and has continuous sidewalks. Refer to Topical Response C, Project Features, for discussion of the proposed Project's pedestrian enhancements.

Comment P702-71 On November 16, 2022, Metro's Ad Hoc Olympics planning committee gave a presentation that indicated an interest in using Dodger Stadium as a park-and-ride lot for the Olympics, citing the positive experience with the recent MLS Championship match

(<https://www.espn.com/soccer/major-league-soccer/story/478859/mls-cup-final-in-la-to-have-no-parking-for-fans-due-to-usc-game>). The draft EIR does not address the impacts of using Dodger Stadium as a park-and-ride lot, whether for the Olympics, for major events at LA Historic Park, or year round for rush hour commuters into Downtown's Civic Center. This is a foreseeable use of that property that would be enabled and made much more frequent by The Gondola, and must be studied in the DEIR. Additional vehicle traffic into our neighborhoods could result in substantial increases in traffic, GHG emissions and pollution in our neighborhoods and in Elysian Park.

Response P702-71 At Metro's November 16, 2022 Ad Hoc Olympics Planning Committee meeting, the Committee approved the 2028 Games Mobility Concept Plan – 2022 Prioritized Mobility Concept Plan Project List (Attachment A).³⁷ The proposed Project was not included in the 2022 Prioritized Mobility Concept Plan Project List (Attachment A). Based upon a review of this meeting, no member of the Ad Hoc 2028 Olympics

³⁷ Los Angeles County Metropolitan Transportation Authority (LA Metro). 2022. 2028 Games Mobility Concept Plan (Attachment A). Available at: <https://datamade-metro-pdf-merger.s3.amazonaws.com/ad-hoc-2028-olympics-committee-6b993d455bc3.pdf>. Accessed August 2023.

Committee discussed the potential for using Dodger Stadium as a parking location for the 2028 Olympics.³⁸ Rather, this commenter raised the possibility themselves during public comment at the meeting. Accordingly, the mere speculation of a single commenter does not mean that Dodger Stadium could be considered as a proposed parking location for the 2028 Olympics such that the Draft EIR should have considered the use of Dodger Stadium as a park-and-ride. This is not a reasonably foreseeable consequence of the proposed Project, as the Los Angeles Dodgers manage the Dodger Stadium parking lot and would have to approve any deal to use the parking lot. Such an agreement is entirely separate from the proposed Project's operations, and the mere possibility that the Dodger Stadium property could be used in such a manner is too speculative to require the analysis in the EIR for this aerial gondola system.

The comment suggests because Dodger Stadium was used as a park and ride for the MLS Cup final in November 2022, Dodger Stadium may similarly be used for other events. However, this was a unique situation that is not a reasonably foreseeable consequence if the proposed Project were to be constructed and implemented. The scenario described involved Major League Soccer's championship game, the location of which was not scheduled in advance. As the commenters' cited article notes, the Los Angeles Football Club's ("LAFC") Banc of California Stadium was only confirmed as the host of the MLS Cup the Sunday prior to the MLS Cup, which would occur at the same time as a pre-scheduled University of Southern California football game at the Los Angeles Coliseum. This meant that parking within the vicinity for the football game took priority, and LAFC was required to coordinate with and obtain approval from the Los Angeles Dodgers for use of the parking lot. It is highly unlikely that such an event would repeat with any sort of frequency requiring the analysis in the EIR for the proposed project. Even so, LAFC utilized shuttle buses from Dodger Stadium to the Banc of California Stadium, and there is no indication that the presence of the proposed Project would have increased the likelihood that Dodger Stadium would be used as a parking location for major events. In sum, the proposed Project would connect LAUS to the Dodger Stadium property via an aerial gondola system. The proposed Project does not contemplate the use of the Dodger Stadium parking lot as a park-and-ride and nor is this use reasonably foreseeable, and accordingly, no such analysis is required.

Comment P702-72 The Dodger Stadium parking lots have 5 entrances. There are huge wide roads leading up to Dodger Stadium. This gondola is not solving the problem of going up a mountain that can only be accessed through only one narrow, windy, two-lane road. Other alternatives, including improvements and dedication of lanes on the roads into Dodger Stadium to encourage access via other modes – bicycle/e-bikes, scooters, and walking – need to be studied in the DEIR.

³⁸ Los Angeles County Metropolitan Transportation Authority (LA Metro). Metro Meeting Recordings – November 16, 2022 Metro Ad Hoc 2028 Olympics Committee meeting. Available at: https://metro.granicus.com/player/clip/2413?view_id=2&redirect=true&h=461b5c8f36092ebca0c1ed190e407b21. Accessed September 2023.

Response P702-72 As described in Section 2.01, Overview of the Project of the Draft EIR, the proposed Project has the ability to overcome grade and elevation issues between LAUS and Dodger Stadium. 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. 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. 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. Refer to Section 5.0, Corrections and Additions, of this Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which 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 was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project.

Comment P702-73 Operating The Gondola at a maximum capacity for a full 2 hours before and after Dodger Stadium games and events seems unrealistic. In order to justify the VMT reductions, more information about how The Gondola system will be implemented is required including management of queues, the boarding areas, and crowds. In addition, ticket prices and the so-called ticket reservation system need to be disclosed. Logistically, operating at maximum capacity appears to be unrealistic at best.

- Station attendants have to intervene to bring a gondola cabin to a full stop any time a person with mobility issues needs to board the gondola. Can this really be accomplished without slowing down the entire system when cabins are supposed to leave each station every 23 or 25 seconds?

- We ask LA ART to explain how the passenger loading will be choreographed to make this an efficient and safe boarding process even when the system is operating at maximum capacity. And likewise for disembarking.
- How will the gondola passengers who need their cabins to come to a full stop to disembark make this known to station attendants?
- How many station attendants will be needed at each gondola station to assist customers when the system is running at full capacity?

Response P702-73 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queueing at stations, and pre-game and post-game transportation. Queues would be managed by efficient vertical circulation and by staff at the station. Refer to Response P702-76 for a discussion of the proposed Project's timed ticket reservation system. 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. 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. 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 how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). 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.

Comment P702-74 The gondola stations appear to be severely undersized, considering their intention to operate the system at maximum capacity for a full two hours before and after each Dodgers game. People do not arrive or leave Dodger Stadium evenly spaced throughout the two-hour period before and after each Dodgers game. As residents, we observe that on our streets. The DEIR lacks crucial information about how crowds will be managed in the station and how they will be accommodated while waiting outdoors in very long lines. For example, will there be shade structures in the Union Station Forecourt, and how will they be arranged? Will the shade structures impact

the views of historic Union Station? Will there be misting systems to provide cooling while people wait outdoors in long lines in the summer to ride the gondola?

Response P702-74 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of how queues would be managed by efficient vertical circulation and by staff at the station. 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. More active queue management would become more frequently needed at Alameda Station as ridership increases toward the 2042 ridership projection of 10,000 riders, but even with the maximum queue length, 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. In addition, post-game queues at Dodger Stadium were estimated based on assumptions about the departure patterns and estimates of walk times from the various seating areas within the stadium. Those seated the furthest away from the Dodger Stadium Station would take more time to arrive at the Station, much like how it is currently for passengers riding the Dodger Stadium Express. In addition, 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. The post-game/event queue for the proposed Project would be constantly moving as cabins would depart every 23 seconds. 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 proposed Project has coordinated with Metro on the design and placement of the Alameda Station vertical circulation within the planned LAUS Forecourt. The proposed Project does not propose shade structures or misting systems.

Comment P702-75 No ticket pricing has been provided to support the claims that this will provide benefits to tourism. Does the price not matter?

Response P702-75 As detailed in Potential LA ART Tourist Ridership in Appendix N, Transportation Appendices, of the Draft EIR, tourism related ridership is estimated from an analysis prepared by HR&A, which determined the potential for the proposed Project to capture a share of the tourism attraction market in the County of Los Angeles.

Comment P702-76 The DEIR fails to describe the timed ticket reservation system that LA ART is relying on to manage wait times and crowds at their stations. Long queues are a common problem of gondola systems, and we are not aware of any gondola systems that serve sports stadiums of this capacity. The details of this reservation system must be

disclosed in the DEIR to determine feasibility because crowds will impact safety, security and ridership of this system. We have major doubts as to the feasibility of a ticket reservation system, and whether one can be implemented in a fair and equitable manner. Unanswered questions include:

- Will the best tickets (closer to the game start time) be held back and reserved for VIPs?
- How would people reserve tickets to leave via the gondola after the game ends, when games don't end at a set time?
- What happens if people arrive late or early? Does LA ART anticipate that people arriving via transit will be able to arrive on time? How many staff will be needed to help customers who have problems with their reservations?
- Will there be a waiting line for people who show up without reservations?
- How many staff would be needed to manage the different queues they might need to manage for customers in different situations: those arriving early, late, on time, and without reservations? Will this not create a bottleneck? Is there space inside the stations for all of these queues?
- Will a Ticketmaster-type system be set up to allow Dodgers fans to reserve their free tickets?
- Will people with a paid membership to an exclusive club or people who hold a particular credit card be given early access to reserve tickets?
- Will tickets be transferable?
- Can LA ART prevent an aftermarket for gondola tickets from forming that makes it nearly impossible for "regular folks" to reserve their "free" gondola tickets, especially those at the most desirable times?
- Will people be allowed to pay a fee to skip the line, similar to a fastpass at Disneyland?
- Will people be able to reserve tickets if they don't have a computer or smartphone?

Response P702-76 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queueing at stations, and pre-game and post-game transportation. Pedestrian queues are not required to be analyzed under CEQA or the City of Los Angeles Transportation Assessment Guidelines (TAG). Nevertheless, the queueing analysis in Topical Response B is provided for informational purposes. The purpose of the timed ticket reservation system would be to reduce queue lengths and

waiting times for riders waiting to board the proposed Project at the Alameda Station or the Chinatown/State Park Station before a large game or event at Dodger Stadium by managing arrival times. Potential elements of such a system could include: the timed arrival reservations would be free; the reservation system would be online; for those without online access, kiosks could be provided at LAUS, the Chinatown/State Park Station, and/or at Dodger Stadium; reservations would be issued for 30-minute arrival periods and the user would pick a time and the boarding station; the timed ticket reservations would be transferable similar to how game and event tickets themselves are transferable; the timed tickets would be checked by proposed Project attendants at the entrance to the line; those who arrive earlier than their arrival window would be fed into the boarding line when possible in advance of their arrival window or wait until their arrival window; those who arrive later than their arrival window would be held and fed into the boarding line when possible; incentives could potentially be offered to encourage choice of earlier windows; and there would be no exclusive access to preferred arrival windows to particular groups of people. The timed ticket reservation system would likely not be used post-game. The system will be more fully developed prior to proposed Project operations.

Comment P702-77 The plans to deal with the massive crowds and queues at the stations before games and events must be in the DEIR. This is a major omission of essential information for evaluating impacts.

- o Where would the queues form, and how many staff would be needed to manage these queues? How would they manage people who are queuing at ground level, but need to use the elevators versus people who can go up the stairs or escalators? Not only would crowds be a safety hazard for the people in the crowds, they would impact street and pedestrian traffic around the gondola stations, perhaps limiting access to LA State Historic Park, Union Station, and El Pueblo.
- o At the October 22, 2022 DEIR information meeting, LA ART's representatives stated that the station platforms had capacity for 150 people. This seems rather low for a system that is expected to board at least 80 people every minute. In terms of the Alameda Station, there appears to be some space for queuing at ground level on the Union Station side of the station, but not on the El Pueblo side of the station, which will have stalls set up for vendors. How will this imbalance of queuing on either side of the station impact the usage of both entrances?

Response P702-77 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's management of queuing at stations, and pre-game transportation. 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. 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 to 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 attendants 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. 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 information is provided only for informational purposes. Queues would be managed by efficient vertical circulation and by staff at the station and 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. More active queue management would become more frequently needed at Alameda Station as ridership increases toward the 2042 ridership projection of 10,000 riders, but even with the maximum queue length, 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.

Queues at the Chinatown/State Park Station would be accommodated within the Station, given this lesser boarding demand and the larger queueing capacity at the station, and would not interfere with access to Los Angeles State Historic Park.

Comment P702-78 The Gondola project cannot control how people arrive to utilize it. A fancy gondola does not encourage more people to take transit to Union Station. Reliable, convenient, frequent, safe and clean rail and bus service to Union Station will encourage more people to take transit to Union Station. And better management and expansion of the Dodger Stadium Express bus service with dedicated bus lanes all the way to the stadium will encourage more people to take transit to Dodger Stadium. The gondola simply provides a tourist attraction that encourages people to drive to Union Station and then take the gondola.

Response P702-78 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project’s ridership model which is based on extensive data sources and assumptions validated by data. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express. 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. 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 the Dodger Stadium Express. The regional rail and bus system is important in order for people to take transit to LAUS, which is true for both the Dodger Stadium Express and the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment P702-79 The implementation of gondola systems for a given application and environment is very important and unique to each system due to local constraints. The lack of a clear operations plan is highly concerning and will impact the success of the system and the capacities that can be realized.

Response P702-79 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 how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). In addition to designing and implementing an operations plan, the proposed Project would include maintenance activities to be performed by the operator and would include daily observation of the overall system as part of the startup routine. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. 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 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 P702-80 In the Transportation Study in Appendix N, there is a discussion about the “customer experience factor” in riding transit and The Gondola, but only the positive attributes

of The Gondola are discussed. This bias is not surprising. However, they also need to factor in the degradation of the customer experience that will happen when operating at maximum capacity for a full 2 hours before and after every Dodgers game. The analysis estimates a 20% increase in ridership of The Gondola due to the uniqueness and cool factor of the technology and being able to take in views. However, the cabins will be packed, and at night, the lighting in the cabins reflecting off of the windows will obscure any views outside of the cabins. Also, considering that a large number of DSE riders are protesting Frank McCourt's continued ownership of the parking lots, and Frank McCourt's involvement in The Gondola project, we believe there are additional factors that would reduce the ridership of The Gondola system. The customer experience of waiting in long lines, like at Disneyland, also may discourage usage of the gondola during the full 2 hour period after games and events.

Response P702-80 Refer to Section 3.17, Transportation and Appendix N, Transportation Appendices, of the Draft EIR and Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR. 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. Refer to Responses P702-73 through P702-78 for discussion of queueing. 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 operations features of the proposed Project. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world that operate safely and efficiently. 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 P702-81 The ridership estimate for The Gondola attributed to people visiting Los Angeles State Historic Park is nonsense. Metro L Gold line already serves the park and connects to Union Station. If you are arriving at Union Station via the Red or Purple Lines or the regional connector, it is much easier to transfer to the Metro L train than to walk all the way outside of Union Station to the gondola station in the middle of Alameda Street. You have to leave Union Station to get to the gondola's Alameda Station. Anyone using The Gondola to access LASHP is doing it for novelty reasons. This should be counted under tourism.

Response P702-81 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project’s ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how the proposed Project’s intermediate Chinatown/State Park Station near the southernmost entrance to the Los Angeles State Historic Park would be located within a short walk to many Chinatown businesses and Metro’s L Line (Gold), creating a stronger connection with the Metro L Line and enhancing transit access to the Los Angeles State Historic Park, Mission Junction, William Mead Homes, and the Los Angeles River. Compared to the Metro L Line (Gold), accessible at the Chinatown Station, the proposed Project’s Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less.

Comment P702-82 Gondola systems like this are designed for tourism and do not warrant the invasion of our neighborhoods and our LA State Historic Park. This quote is in reference to the Rio gondola build for the 2016 Olympics: “Local often remarked that these spectacularized security and infrastructure investments were “para inglês ver” – “for the English to see.” This phrase dates back to 1831 when Brazil’s government only pretended to stop its slave trade to appease the (suddenly righteous) British. Today, it describes projects that are superficial rather than substantive, designed to impress tourists and investors while leaving underlying problems locals face daily intact.”

<https://knock-la.com/from-rio-to-la-the-olympic-games-are-the-exclusion-games-c5bec60a65f1/>

Response P702-82 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. 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. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. 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. 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 P702-83 This system provides views that are more or less already accessible at Dodger Stadium. Most of the route is less than 50 feet above the ground. There is a high probability of this system being mocked and labeled as “overrated” and too expensive for most tourists.

Response P702-83 As detailed in Potential LA ART Tourist Ridership in Appendix N, Transportation Appendices, of the Draft EIR, tourism related ridership is estimated from an analysis prepared by HR&A, which determined the potential for the proposed Project to capture a share of the tourism attraction market in the County of Los Angeles. Refer to Table 2-2: Proposed Project Station and Junction Details and Table 2-3: Proposed Project Tower Details of Section 2.0, Project Description, of the Draft EIR for the heights of the proposed Project stations, junction, and towers. In addition, as discussed in Section 2.0EIR, the proposed Project alignment profile is provided in Appendix Q, Proposed Alignment Plan and Profile, 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. 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 P702-84 Construction Traffic and Staging for Maintenance/Repairs

During deck removal at the Broadway Junction, which is estimated at 3 weeks, will all of the traffic coming south on Broadway be funneled into our residential Street Savoy Street? This is a major thoroughfare for rush hour traffic into Downtown LA's Civic Center. If Broadway is closed and opened only to residents, how will visitors be able to drive into the area?

Response P702-84 As discussed on pages 3.17-56 and 3.17-57 in Section 3.17, Transportation, and shown on pages 41 and 43 in Appendix B, Construction Assumptions, attached to the

Draft EIR, construction of deck shoring, cribbing and erection would require the full closure of Broadway at Bishops Road and of Bishops Road at Broadway for two weeks, and deck removal will require the full closure of Broadway at Bishops Road and of Bishops Road at Broadway for three weeks. As shown on Figure 3.17-11 in Section 3.17 the proposed detour route for through traffic on Broadway during these closures is Spring Street. As discussed on pages 3.17-56 and 3.17-56 and shown on Figure 3.17-11, restricted local and emergency access would be provided to allow access to adjacent properties along Broadway and to properties along Savoy Street and Cottage Home Street.

Comment P702-85 The construction documents for the Broadway Junction do not show where the drive motor would be located. Is that at ground level?

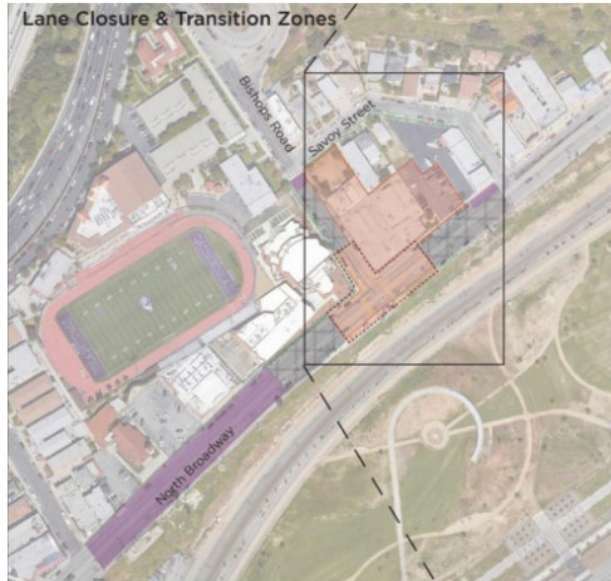
Response P702-85 Refer to Responses P702--24 through P702-27 for discussion of the drive motor at the Broadway Junction.

Comment P702-86 In the DEIR, it states, “Annual maintenance activities may require crane access at tower locations, including the potential to require the temporary closing of traffic lanes.” Regular maintenance for this project will add to existing traffic congestion. Enhancing and expanding the Dodger Stadium Express service will not.

Response P702-86 Refer to Response P702-69 for discussion of how lane closures associated with maintenance activities would be temporary and how maintenance activities would not necessitate the same road closures as those necessary for the construction of the proposed Project. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express 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.

Comment P702-87 “For multi-level stations, a strategy to change heavy machinery and parts (i.e. gearboxes, motors and etc.) will be required in case parts are broken. For instance, if a station is 4 storeys high, project proponents must design and have strategies in place to remove and deliver machinery.”

(https://www2.trafikkontoret.goteborg.se/resourcelibrary/underlagsrapport_best-practices.pdf)

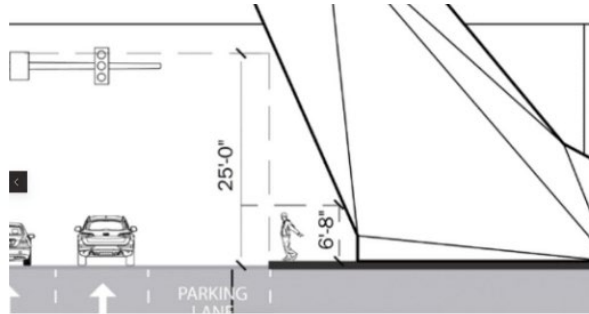


DEIR Image – Road Closures at Broadway Junction during Construction

Response P702-87 Refer to Response P702-69 for discussion of how lane closures associated with maintenance activities would be temporary and how maintenance activities would not necessitate the same road closures as those necessary for the construction of the proposed Project. This comment includes an image from Appendix B, Construction Assumptions, of the Draft EIR, which depicts the Deck Removal phase of construction of the Broadway Junction. This phase of construction would be three weeks. As discussed in Section 3.17, Transportation, and Appendix B, Construction Assumptions, of the Draft EIR, most to all lanes would remain open during the other phases of construction of the Broadway Junction, including Foundations and Columns (28 weeks), Structural Steel and Gondola Equipment Erection (38 weeks), and Vertical Circulation / Hardscape and Landscape / Interior Work (29 weeks).

Comment P702-88 Pedestrian Impact

Alpine Tower requires that a traffic lane on Alameda Street be sacrificed in order to maintain a sidewalk around the base of the 200 ft tall gondola tower, which sits at the edge of the existing curb/sidewalk. The tower, however, still crowds the sidewalk by leaning into the airspace above the sidewalk. This looks like a very unpleasant pedestrian experience. The sidewalk needs to be wider, but this project is already taking space on our streets that could be used for wider sidewalks, bus lanes, and bike lanes. What is the impact of this tower, the space it needs on the street, to planned improvements to Alameda Street? Does this mean a protected bicycle lane or a bus lane can never be on this side of Alameda Street?

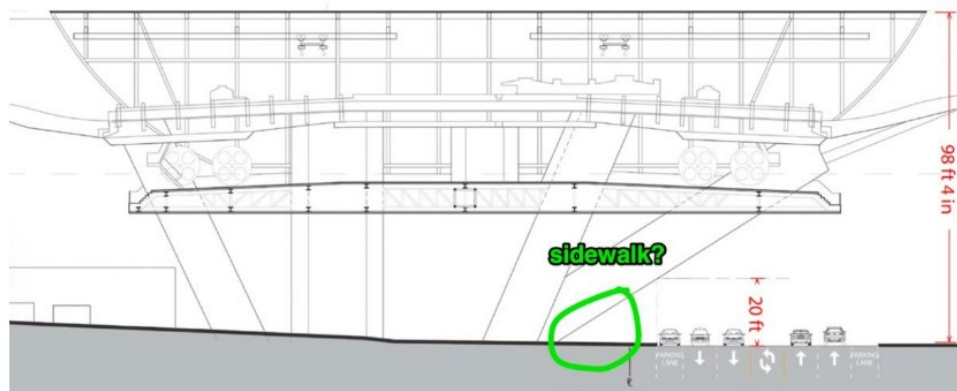


Close Up of DEIR Image Showing the Base of the Alpine Tower

Response P702-88 The Alpine Tower would not require that a traffic lane on Alameda Street be eliminated. A comparison of the Alpine Tower | Existing diagram on page 25 and the Alpine Tower | Build-Out diagram on page 31 in Appendix B, Construction Assumptions, Exhibit 1, Overview of Construction Phasing and Area Conditions, of the Draft EIR shows that the same number of travel lanes will be provided on Alameda Street after construction of the Alpine Tower is complete as there are under existing conditions.

Regarding the sidewalk width, the sidewalk adjacent to the proposed Alpine Tower location is approximately 10 feet in width. As noted on page 3.17-9 of Section 3.17, Transportation, of the Draft EIR, Alameda Street is classified as an Avenue I and is also designated as part of the Bicycle Enhanced Network in the City of Los Angeles Mobility Plan. Avenue I facilities have a desired right-of-way width of 100 feet. The existing right-of-way width of this portion of Alameda Street is greater than 100 feet. As such, the tower should not conflict with future City plans.

Comment P702-89 Broadway Junction: More information is needed on the sidewalks around the Broadway Junction, especially at the area indicated in the image below. How high is the overhead clearance of the support column, how wide is the usable space of the sidewalk? There is a bust stop located at this location on Broadway. Will this interfere with a bust stop shelter? How wide will the sidewalk be along Bishop's Road? Currently, there is no sidewalk, even though it is an official route to Dodger Stadium.



DEIR Image of Broadway Junction with Notes

Response P702-89 The sidewalk along Broadway is approximately 10 feet in width. The column would have an overhead clearance of approximately 12 feet. The support column would not interfere with a bus stop shelter on Broadway since the support column would be projecting over the Broadway and Bishops Road intersection, not over the bus stop location. The existing, partial sidewalk along Bishops Road is approximately 7 feet wide.

Comment P702-90 Parking study

Many of the parking lots identified in the parking study are inappropriately counted as parking in Chinatown that would be available to gondola visitors. These lots include parcels that are already slated for development, lots and garages that close too early for most events at Dodger Stadium, and spaces in the Union Station parking garage that are already reserved for other uses. We respectfully ask that LA ART provide an updated count of the available parking without these spaces rather than offering a vague assurance that there will be plenty of parking even if several parking lots in Chinatown are redeveloped.

The parking lots that are already slated for redevelopment include the lots that LA ART labeled as Lots 21, 24, 28, and 44 in their map below.



Parking Lot Map Taken from DEIR

- Lot 21

Count "Lot 45".

<https://la.urbanize.city/post/county-owned-parking-lot-chinatown-eyed-development>

<https://www.lachinatowncc.org>

“We came together with like-minded people to turn Lot 45 into housing that will serve the Chinatown community. We are happy to announce that at the request of Supervisor Hilda Solis 1.5M was given to LA County by Representative Gomez to do a study on how to turn Lot 45 into affordable housing in Chinatown. We are aiming for 400 hundred extreme low-income to low-income units to be placed on Lot 45. We will share more details as things continue to develop. It was a great day today! May 4, 2022 “

- Lot 24 – 643 N Spring St.

<https://la.curbed.com/2018/4/19/17254338/studio-gang-los-angeles-chinatown-tower>

<https://planning.lacity.org/odiscaseinfo/document/NDU1NzA0/6d189c69-33a8-4be1-9414-6b0ce5c25431/esubmit>

- Lot 28 – 717 N Hill St.

<https://la.urbanize.city/post/411-apartments-retail-pitched-chinatown>

“Eight-story building slated to replace parking lot on Hill Street”

“The proposed project is among the largest new housing complexes proposed in Chinatown, eclipsing only by the 725-unit College Station development near Los Angeles State Historic Park.”

- Lot 44 – 211 Alpine St.

<https://la.urbanize.city/post/developer-retools-chinatown-project-toc-guidelines>

- In addition, Lot 48 on the map is Los Angeles State Historic Park’s parking lot, which closes at sunset. This lot should not be included unless the park has committed to staying open until at least 12:30 am for every game and event at Dodger Stadium to allow people to remove their vehicles from their gated parking lot, which seems unlikely.
- Lot 37, the Metro Chinatown Station Parking Garage, should also not be included. Residents at Metro Lofts senior apartments, including seniors with mobility issues, rent spaces there monthly, and already have trouble finding parking there. They pay for the right to park in that lot, but it doesn’t guarantee them a space.

Response P702-90 Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines (“TAG”). Nevertheless, the 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. As shown in Table 1 on page 7 of the Parking Study, 6,876 spaces were counted in off-street lots and garages within the parking study area, of which 32% were occupied at 8:00 PM on the game day and 31% were occupied at 8:00 PM on the non-game day and approximately 4,700 spaces were available. All existing, publicly available off-street parking lots and garages within a ½-mile walkshed around the Alameda Station and Chinatown/State Park Station were included in the Parking Study for completeness. Refer to Response P702-92 for a discussion of how these numbers would change if the off-street lots identified in the comment were to be excluded from the analysis.

Comment P702-91 There are several other parking garages in Chinatown that currently close early or are closed on holidays, and their inclusion in the count of available parking for gondola patrons is questionable unless those owners/operators have stated a willingness to modify their operations to serve gondola riders.

Response P702-91 Refer to Response P702-90 for a discussion of the Parking Study. As stated on Page 10 of the Parking Study:

Parking management strategies and specific implementation steps will be further detailed in a parking management plan prepared in the future in collaboration with the City of Los Angeles, who would be the implementer of any on-street parking management strategies. This process would gather robust feedback from community stakeholders to inform its development. Preparation of a detailed parking management implementation plan, and implementation of its recommendations would precede the operations of the proposed Project.

The parking management plan would include identification of specific partnerships with parking owners/operators and businesses and, as such, cannot be fully detailed until closer to proposed Project operations. In addition, robust feedback from community stakeholders would inform development of the plan, to ensure the parking management plan is designed to alleviate any potential localized increase in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station. A preliminary version of the parking management plan has been prepared, however, and is available on the proposed Project's SB 44 website.³⁹

Comment P702-92 Union Station Parking Count: Spaces reserved for Metro Emergency Vehicles, Facilities Maintenance, Maintenance Carts, Metro Board and Staff, 10 Minute Waiting Zones, Childcare pickup and drop off, and other reserved uses appear to have been

³⁹ Fehr & Peers. 2023. Los Angeles Aerial Rapid Transit Project, Parking Management Implementation Plan.

counted as available parking for gondola customers. We ask for an accurate count of available parking that does not include spaces reserved for other uses.

Response P702-92 Refer to Response P702—90 for a discussion of the Parking Study. All existing, publicly available off-street parking lots and garages within a ½-mile walkshed around each proposed Project station was included in the parking study for completeness. If the off-street lots identified in Comment P702-90 and the reserved parking spaces at Union Station/Metro Gateway identified above in Comment P702-92 were to be excluded from the analysis, the total off-street space count would be 5,697, of which 32% were occupied at 8:00 PM on the game day and 31% were occupied at 8:00 PM on the non-game day (with approximately 3,900 spaces available). This does not change the conclusion in the Parking Study that there is a substantial amount of unoccupied off-street spaces available with little difference in off-street parking occupancy between game days and non-game days.

Comment P702-93 Flaws in pre-COVID Calibration

- The parking study uses 2012 data at Union Station to calibrate the September 2021 survey to estimate the ridership that would have existed had there not been a COVID-19 pandemic. This presumes that the park-and-ride activity at Union Station did not increase between 2012 and 2019, which is inconsistent with their claim that there will be increased demand for the gondola between 2028 and 2040 due to the build out of the public transit network. The Expo Line (to USC and to the beach) opened on April 28, 2012, and the Foothill extension of the Gold Line to Azusa opened on March 5, 2016. Yet, no adjustments were made to account for the differences in the public transit system that should have attracted more riders between 2012 and 2019.
- The 2012 calibration using parking data at Union Station does not account for increased activity at Cathedral High School, which only returned to pre-pandemic levels in September of 2022. In September 2021, the high school did not have football games with full attendance, if at all. But in 2022, football games and events at the school resumed with full attendance, including dances, theater performances, and other sporting events, which often take up all of the parking in our neighborhood on Savoy Street, Bishops Road, Cottage Home Street, and along Broadway. At peak times, such as Friday night football games, which would have been captured in the September 2021 survey were it not for the pandemic, people park in front of fire hydrants, at street corners, and block driveways. None of the street parking in our neighborhood and along Broadway between Solano Avenue and Bernard Street should be counted in this parking study as “available parking.” On Friday, September 16, 2022, all of this parking was fully occupied for a football game at Cathedral High School.



Parking By Cathedral High School, Friday, September 16, 2022

- Our neighborhood is already burdened by traffic at Cathedral High School on an almost daily basis, especially during student pick up and sporting events. Parking enforcement takes more than 1 hour to arrive, even when our driveways are blocked. This is both a nuisance and a safety hazard for residents.

Response P702-93 Refer to Response P702-90 for a discussion of the Parking Study. The comment states that the Parking Study uses 2012 data at LAUS to calibrate the September 2021 survey to estimate the ridership that would have existed had there not been a COVID-19 pandemic. This is not accurate. The adjustment to reflect non-COVID conditions was not in the estimation of ridership, but rather in the estimation of utilized parking spaces. The 2012 parking counts at LAUS were the only available pre-COVID parking counts in order to calculate an adjustment factor. However, the E Line (Expo) and the L Line (Gold) expansion projects referenced in the comment are unlikely to have caused a substantial change in park and ride demand at LAUS, as the E Line (Expo) does not directly serve LAUS, and the park and ride patterns for the Azusa extension of the L Line (Gold) line are more likely to increase parking at Azusa and along L Line stations towards the end of the line, with riders traveling by transit to LAUS rather than parking at LAUS. Additionally, the use of the 2012 data and the overall COVID-19 calibration factor were reviewed and determined to be reasonable by both staff of both Metro's and the Los Angeles Department of Transportation (LADOT)'s parking group. As shown in Table 2 on page 8 of the Parking Study, 3,417 on-street parking spaces were counted within the parking study area, of which 59% were occupied at 8:00 PM on the game day and 58% were occupied at 8:00 PM on the non-game day (including the application of the COVID-19 calibration factor) and approximately 1,400 spaces were available.

Activities at Cathedral High School affect the surrounding street parking, as do events at the Los Angeles State Historic Park, events at local businesses, and events in private homes. Streets in the vicinity of Cathedral High School and the Savoy Steet neighborhood were included in the parking survey for completeness. If the streets identified above in Comment P702-93 were to be excluded from the analysis, the total on-street space count would be 3,160, of which 62% were occupied at 8:00 PM on

the game day and 61% were occupied at 8:00 PM on the non-game day (including the application of the COVID-19 calibration factor) with approximately 1,200 spaces available. This does not change the conclusion in the Parking Study that there is a substantial amount of unoccupied on-street spaces available with little difference in on-street parking occupancy between game days and non-game days.

Comment P702-94 Much of the paid parking in Chinatown is currently inexpensive street parking or parking lots that charge \$5 all day. This will change if the gondola patrons choose to park in Chinatown to ride The Gondola to Dodger Stadium. LA ART has no control over the mode of transportation that their customers use to access their system, but it is a foreseeable outcome that many of The Gondola’s customers will choose to drive rather than take transit to its stations. Metro’s recent challenges attracting riders back to transit following the sharp decline during the COVID-19 pandemic have been well publicized and lead to the establishment of the transit ambassadors program. Because the gondola system is marketed as a futuristic, luxury transit option, it’s highly likely that most riders who would ride the private gondola, but not take the free Dodger Stadium Express, would opt drive to a gondola rather than take public transit for their entire journey.

Response P702-94 Refer to Response P702-90 for a discussion of the Parking Study. Refer to Response P702-65 for a discussion of the estimated non-auto mode of access of 67.5%. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project’s ridership model which is based on extensive data sources and assumptions validated by data. As discussed in Section 3.17, Transportation and noted on page 12 and shown on the table following page 22 of Ridership Model Development in Appendix N, Transportation Appendices, of the Draft EIR, the automobile mode of access to the proposed Project for choice riders was assumed to be higher than for current Dodger Stadium Express riders.

Comment P702-95 If Chinatown is turned into a park-and-ride lot for The Gondola, businesses in Chinatown that need inexpensive street parking for their customers, especially the mom and pop legacy businesses, will be hurt. Customers may decide to go elsewhere to buy pastries or herbs, rather than to deal with the hassle and expense of parking in Chinatown. The last full-service grocery stores in Chinatown closed in part due to parking fees.

- o “Parking and a new landlord were also a factor for Ai Hoa Market, which is closing and relocating to South El Monte by the end of the year. Linda Hang, 41, the daughter of the market’s owner, says their business suffered when the property owner started charging them several thousand dollars a month for use of the parking lot.”

(<https://latimes.com/california/story/2019-09-22/chinatown-gentrification-grocery>)

Response P702-95 Refer to Responses P702--90 and P702-93 for a discussion of the Parking Study. The parking survey tables presented in Attachment A - Parking Counts and the parking occupancy maps presented in Attachment B – Parking Data Maps in the Parking Study shows that the vast majority of off-street parking lots in Chinatown are estimated to be occupied at a level of less than 40 percent and an overall average of only about 15 percent (including the COVID adjustment factor), with over 1,800 available unoccupied spaces at 8:00 PM. Street parking in Chinatown was found to be occupied at a higher rate, roughly 60% occupied at 8:00 PM, with approximately 200 available spaces. Thus, there is available parking in Chinatown in the evening, which is when the vast majority of Dodger games take place. Refer to the Parking Study for a discussion of the proposed Project's parking management plan. 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 potential partnerships with and benefits to local businesses in Chinatown. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, including how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety.

Comment P702-96 Green House Gas (GHG) Emissions

The Gondola Project involves the construction of massive concrete towers and stations to support this new infrastructure. The DEIR does not consider the GHG emissions from the manufacture of concrete that will be used in The Gondola Project. The manufacturing of concrete is a major source of GHG emissions (<https://www.nature.com/articles/d41586-021-02612-5>). In comparison, the preferred alternative studied in the DEIR of expanding the Dodger Stadium Express shuttle buses does not require the building of new concrete structures. Nor are any new roads proposed.

Response P702-96 Refer to Section 3.08, Greenhouse Gas Emissions, and Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR for a discussion of the proposed Project's potential greenhouse gas emissions. The Draft EIR's analysis is consistent with guidance from the California Natural Resources Agency and the SCAQMD-recommended model, CalEEMod®. The CalEEMod® model was developed by SCAQMD in coordination with other California air districts under the direction of the California Air Pollution Control Officers Association (CAPCOA). Sources of the model's calculation methodologies and default data include SCAQMD-specific emission factors, USEPA AP-42 emission factors, EMFAC2021 for vehicular emissions, and studies commissioned by the California Energy Commission (CEC) and California Department of Resources Recycling and Recovery (CalRecycle). Lifecycle-type impacts

related to the manufacture of the materials used during construction (such as concrete) are outside the scope of a standard CEQA analysis. The California Natural Resources Agency has found that lifecycle analyses are typically not warranted for project-specific CEQA analysis for a variety of reasons, including lack of control over some sources and the potential double-counting of emissions. Because the origin of the raw materials purchased is frequently not known and manufacturing information for those raw materials may also not be available, calculation of lifecycle emissions would be speculative, and a lifecycle analysis is not warranted.⁴⁰ Therefore, consistent with guidance from the California Natural Resources Agency and the model recommended by CAPCOA and SCAQMD, the Draft EIR does not include GHG emissions associated with concrete manufacturing. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express 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. As discussed in Topical Response H, 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 Dodger Stadium Express, and an off-site loading facility would need to be developed to accommodate the new level of bus activity. 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. 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.

Comment P702-97 The GHG emissions estimates for The Gondola are estimated using the flawed VMT analysis provided by Fehr & Peers. (See Traffic section for more information.)

Response P702-97 Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions,

⁴⁰ California Natural Resources Agency (CNRA). 2009. Final Statement of Reasons for Regulatory Action. Available at: https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/Final_Statement_of_Reasons.pdf. Accessed August 2023.

and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model – including the VMT analysis – which is based on extensive data sources and assumptions validated by data. Metro hired Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR. 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.

Comment P702-98 The GHG emissions estimated for The Gondola assume that there is funding to pay for energy sourced from LADWP's Green Energy program. Because LA ART has publicly stated that a funding plan is still under development, this is a flimsy assumption. Therefore, the DEIR must analyze an equally, if not more likely scenario, which is that LA ART may need to purchase energy from conventional LADWP sources if The Gondola suffers cost overruns, which happens more often than not with transit projects, and calculate GHG emissions under this scenario.

It is confusing whether this project is committing to using air conditioning in the cabins or not, which should impact GHG emissions. Air conditioning may also impact usability of the system in the summer because it may be too dangerous to allow people to ride in the cabins with windows that don't open.

Response P702-98 Refer to Section 3.08, Greenhouse Gas Emissions, and Appendix J, Greenhouse Gas Emissions, of the Draft EIR, for a discussion of the proposed Project's greenhouse gas emissions, including the GHG emissions associated with electricity demand, concluding that the proposed Project will have a less than significant impact on GHG emissions. In fact, due to the VMT reductions associated with the proposed Project, the proposed Project results in a net reduction of GHG emissions and helps advance local and state climate policies. See Section 3.8.4 and Table C-1 through Table C-4 provided in Appendix J for additional discussion. The proposed Project's use of electricity supplied from LADWP's Green Power Program is a voluntary commitment by the proposed Project to further demonstrate the proposed Project's leadership towards sustainable transportation. In response to comments suggesting that this commitment is illusory, to the proposed Project has added this Project commitment as an enforceable Project Design Feature, GHG-PDF-A. The addition of GHG-PDF-A has been incorporated into Section 5.0, Corrections and Additions, of this Final EIR. The proposed Project would implement the Project Design Feature as part of the Project's operations in accordance with the Mitigation Monitoring and Reporting Program set forth in Section 7.0, of this Final EIR. The estimated electricity demand of the proposed Project encompasses the demand for the entire gondola system (including

potential cabin air conditioning). 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 power for the proposed Project cabins. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding.

Comment P702-99 On page 60 of Appendix J – GHG technical Report, footnote #4 states, “Estimated annual electricity usage provided by SJC Alliance and was reduced by the amount of electricity anticipated to be used by the park amenities.” And “Estimated electricity usage (kWh/yr):6,881,212.” We ask that explanation be provided as to how the estimated electricity usage was calculated. Was air-conditioning in the cabins included in this figure? 6.8 GWh is enough to power approximately 1000 homes for an entire year in the LADWP service region (according to LADWP average of 545 kWh/month per home). Much of the gondola operations near capacity will happen during peak power demand times, 4pm – 9pm. We are concerned that this concentration of new power demand in our neighborhood will put additional strain on our electric grid, and that's with very few electric cars in our neighborhood charging on the grid. There were multiple flex alerts in the summer of 2022 during which residents in Echo Park and Los Feliz lost power for many hours due to overwhelmed equipment.

Response P702-99 The Draft EIR evaluated the proposed Project's potential energy impacts in Section 3.06, Energy, with supporting analysis in Appendix H, Energy Technical Report, and demonstrated that impacts to energy would be less than significant. The Draft EIR's estimated electricity demand encompassed demand for the entire gondola system and the overall operation based on the ridership assumptions included in the Draft EIR. See Table 3.17-4 on page 3.17-35 of Section 3.17, Transportation, and pages 6 – 38 of Appendix N, Transportation Appendices, of the Draft EIR. As described in Section 3.06, the estimated electricity use considers gondola and non-gondola system components, including potential electricity use for cabin air conditioning. The gondola portion of the electricity use was estimated based on several use cases with varying levels of activity, while the non-gondola portion of the electricity use considers the ancillary uses such as escalators and emergency lights. Collectively, the gondola and non-gondola components and their associated power requirements form the estimated annual electricity usage reported in Section 3.06. Refer to the *Gondola Operating Scenarios and Power Technical Memorandum* from SCJ Alliance, dated February 22, 2022, for the underlying power requirements for each operating scenario used to inform the analysis of the proposed Project's energy impacts.⁴¹ As discussed in Section 3.19, Utilities and Service Systems, of the Draft EIR, the Draft EIR demonstrates that the proposed Project would not have a substantial impact on peak

⁴¹ SCJ Alliance Consulting Services. 2022. Gondola Operating Scenarios and Power.

and base period demands for electricity and other forms of energy. In addition, as discussed in Section 5.0, Corrections and Additions, of this Final EIR, LADWP confirmed that its 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. As discussed in Section 3.19 of the Draft EIR, the proposed Project was found to not have a substantial impact on local or regional energy supplies or require additional capacity to be constructed. Additionally, as stated in Section 3.06, Energy, of the Draft EIR, while the 2.5 MW of power required for operation of the proposed Project may occur during high-peak energy demand periods, the value represents a very small portion of the projected 6,500 MW peak demand for LADWP and therefore does not create a significant impact. As such, it is unlikely that the power demand created by operation of the proposed Project would meaningfully contribute to potentially issued flex alerts for the region.

The comment states a concern about EV charging and the additional strain that would potentially be placed on LADWP's power supply. As LADWP expands its power output while simultaneously planning to incorporate greater renewable resources into its power mix, LADWP's 2022 Strategic Long-Term Resource Plan (SLTRP) considers expanded EV charging capacity of the region. The LADWP's 2021 load forecast is used to project customer demand for electricity over the next 20 years, and the modeling in the SLTRP set the capacity requirements to ensure that LADWP has sufficient capacity to meet customer load while accommodating development like increased EV charging. The 2017 LADWP SLTRP is referenced in Section 2.0, Project Description, of the Draft EIR, and was the most current version available at the time the Draft EIR was prepared.

Additionally, as noted in Section 2.0, Project Description the Draft EIR, the proposed Project would include the installation of battery storage at each gondola station, tower, and non-passenger junction to supply backup power. Inclusion of backup battery power is provided to create resilience against potential vulnerabilities to power grid failure. As set forth in Table A-4 of Appendix H, Energy Technical Report, of the Draft EIR, this feature is consistent with Metro's 2019 Metro Climate Action and Adaptation Plan measure to "increase redundancy in power systems, installing additional backup generators." Although this measure applies to Metro and not directly to an individual transit project like the proposed Project, the proposed Project is consistent because it will have battery backup storage to use if electric power is disrupted.

Comment P702-100 Ridership estimates are provided on page 65. Without any estimate as to what tickets may cost for tourists and anyone outside of the Community Access Program Area (Historic Cultural North Neighborhood Council boundaries, which includes Chinatown, Solano Canyon, El Pueblo, Victor Heights, and the William Mead area), there cannot be a ridership estimate. The assumption being made is that ridership is

price insensitive, which is false. This is another reason why this DEIR has been released prematurely, before the project has been adequately evaluated for feasibility, including financial feasibility. In the absence of an estimate for ticket prices, there should at the very minimum be a range of ridership numbers presented, not just a single number. As mentioned in other sections of this comment letter, there are several other issues that will affect ridership that are not related to ticket prices such as management of queues and the ticket reservation system.

Response P702-100 As detailed in Appendix N, Transportation Appendices, of the Draft EIR, tourism related ridership is estimated from an analysis prepared by HR&A, which determined the potential for the proposed Project to capture a share of the tourism attractions market in the County of Los Angeles. The HR&A Analysis of Potential LA ART Tourist Ridership is included in Appendix N. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queueing at stations, and pre-game and post-game transportation, including the ticket reservation system. In addition, the Draft EIR itself serves as a "feasibility study" for the proposed Project, analyzing the proposed Project's potential environmental impacts. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response C, Project Features, for discussion of how 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.

Comment P702-101 The GHG emissions reductions are overstated and overly optimistic. This system still consumes electricity that has to be generated somewhere. How much electricity will be wasted if this system is running empty most of the day? This is not disclosed in the Draft EIR. At maximum capacity, this system is estimated to use 2.5 megawatts of energy, which is approximately enough electricity to power 2000 homes. Does that include air conditioning for the cabins during the summer months? This is not clear in the DEIR.

Response P702-101 Refer to Section 3.08, Greenhouse Gas Emissions, and Appendix J, Greenhouse Gas Emissions, of the Draft EIR, for a discussion of the proposed Project’s greenhouse gas emissions, including the GHG emissions associated with electricity demand, concluding that the proposed Project will have a less than significant impact on GHG emissions. Refer to Section 3.06, Energy, and Appendix H, Energy Technical Report, of the Draft EIR, for a discussion of the proposed Projects energy demand, which would be less than significant. Importantly, it was found that the proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources nor would it conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Refer to Responses P702-96 through P702-99 for a discussion of the anticipated electrical usage from the proposed Project and greenhouse gas emissions reductions analysis. Refer to Section 2.06, Ridership, of the Draft EIR for a discussion of how 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.

As discussed in Section 3.19, Utilities and Service Systems, of the Draft EIR, the Draft EIR demonstrates that the proposed Project will not have a substantial impact on peak and base period demands for electricity and other forms of energy. The proposed Project was found to not have a substantial impact on local or regional energy supplies or require additional capacity to be constructed. Refer to Response P702-98 regarding air conditioning in the cabins.

Additionally, as noted in Section 2.7.8, Power Requirements, of the Draft EIR, the proposed Project would involve the installation of battery storage at each gondola station, tower, and non-passenger junction to supply backup power. Inclusion of backup battery power is noted in Section 2.7.8, Power Requirements, of the Draft EIR to create resilience against potential vulnerabilities to power grid failure. As set forth in Table A-4 of Appendix H, Energy Technical Report, of the Draft EIR, this feature is consistent with Metro’s 2019 Metro Climate Action and Adaptation Plan measure to “increase redundancy in power systems, installing additional backup generators.” Although this measure applies to Metro and not directly to an individual transit project like the proposed Project, the proposed Project is consistent because it will have backup battery storage to use if electric power is disrupted.

Comment P702-102 Pg 104 – Disagree with many conclusions in the table.

- o #1 – This project will be damaging to small businesses in Chinatown that don’t have parking for their customers.’
- o #2 – This is private transportation, not public transportation.
- o #6 – If The Gondola is a last mile option to access Elysian Park, then why do people need another last mile option, a mobility hub with bicycles at Dodger

Stadium, to access Elysian Park? This is because The Gondola is NOT a last mile option and cannot be described as such. Users can only enter and exit the system at intervals that match those of light rail. Light rail is not a last mile option and neither is The Gondola. LA ART must stop describing The Gondola as a last mile option. Buses are a last mile option.

Response P702-102 The comment includes a characterization of Table C-3, Consistency with Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy), of Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR. Table C-3 outlines various Connect SoCal (2020-2045 RTP/SCS) goals and provides a consistency analysis for the proposed Project. Regarding #1, refer to Response P702-95 for a discussion of the proposed Project's parking management plan and potential partnerships with and benefits to local businesses in Chinatown. Regarding #2, refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Regarding #6, as discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown while unifying and connecting communities through transit mobility access, including to Dodger Stadium and Elysian Park via the mobility hub at the Dodger Stadium Station. The comment states that access to the system will be at intervals that match those of light rail. The cabins on the gondola system will operate continuously with greater frequency than light rail arrivals to and departures from the proposed Project's stations.

Comment P702-103 Pg 105 – Disagree with many conclusions in the table.

- o #7 – This project does not adapt to climate change in that during the summer months, the gondola system will be susceptible to shutdowns during heat waves. Electric buses also may need to shut down during heat waves, but can continue running longer. There are not as many safety issues with running electric buses when it is hot outside.
- o #8 – In other words, this project is being tested on communities of color who have already been divided by transportation infrastructure by redlining.
- o #10 – This project destroys habitat at the entrance of LA State Historic Park.

Response P702-103 The comment includes a characterization of Table C-3, Consistency with Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy), of Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR. Table C-3 outlines various Connect SoCal (2020-2045 RTP/SCS) goals and provides a consistency analysis for the proposed Project. Regarding #7, the proposed Project would be operable in all anticipated temperatures and would adhere to applicable active weather alerts. Refer to Section 3.06, Energy, and Appendix H, Energy Technical

Report, of the Draft EIR for evaluation of the proposed Project's potential energy impacts, which would be less than significant. Additionally, as noted in Section 2.7.8, Power Requirements, of Section 2.0, Project Description, of the Draft EIR, the proposed Project would involve the installation of battery storage at each gondola station, tower, and non-passenger junction to supply backup power. Backup battery would create resilience against potential vulnerabilities to power grid failure. As set forth in Table A-4 of Appendix H, Energy Technical Report, of the Draft EIR, this feature is consistent with Metro's 2019 Metro Climate Action and Adaptation Plan measure to "increase redundancy in power systems, installing additional backup generators." Although this measure applies to Metro and not directly to an individual transit project like the proposed Project, the proposed Project is consistent because it will have battery backup storage to use if electric power is disrupted. 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 and operations features of the proposed Project. Regarding #8, refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR fully analyzed and disclosed the proposed Project's potential environmental effects, including on the surrounding communities. Specifically, 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. Regarding #10, refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR and Appendix G, Supplemental Biological Resources, of the Final EIR for discussion of how the proposed Project would remove 0.24 acres of wooded habitat at the Los Angeles State Historic Park and would result in a marginal short-term reduction of suitable tree habitat, but the replacement of trees proposed for removal would more than offset any potential reduction of habitat associated with the proposed Project in the long-term.

Comment P702-104 Wildfire Safety

The report on wildfires in the DEIR does not address the impact of the gondola on firefighting – in particular water dropping helicopters. Our neighborhood has frequent brush fires on Radio Hill, especially during the summer. Water dropping helicopters often fly very low over our homes. Would their flight paths be impacted by the gondola over our neighborhood?



Phyllis Ling @aPhyllisLing · Aug 7, 2022

The neighborhood by Radio Hill is not a good place for a **gondola**. Homes have been at the edge of Elysian Park for over 100 years. We need water-dropping **helicopters** to fly over our homes. We don't need McCourt's **Gondola** to Dodger Stadium flying over our homes! [#StopTheGondola](#)



Water-Dropping Helicopter Over Savoy Street & Radio Hill

August 2022



Water-Dropping Helicopter Over 455 Savoy Street, August 2022



Water-Dropping Helicopter Over 451 Savoy Street, August 2022

Response P702-104 Refer to Appendix I, Firefighting Helicopter Response Memo, of the Final EIR and Appendix O, Airspace Analysis, of the Draft EIR for discussion of how helicopter flight paths would not be impeded as a result of the proposed Project. As discussed in Appendix I, firefighting operations would consider the proposed Project components, which will be marked with red aviation lights and included on navigational charts. Further, the surrounding area includes multiple obstacles that a pilot must avoid, including trees, poles, antennas, and buildings. Because pilots are required to see and avoid all obstacles—which would include the proposed Project—and operate within the limitations of the helicopter performance specifications, helicopter flight paths and firefighting efforts would not be impeded as a result of the proposed Project.

Comment P702-105 Environmental Justice

This project will increase the impacts of air pollution from vehicle emissions in an area already overburdened by air emissions.

Response P702-105 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 Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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.

Comment P702-106 As residents, we are being asked to shoulder the burdens and negative impacts of this project in order to serve a greater good, but we don't believe the case has been made that there is a benefit to the broader community. Traffic will not be helped, it will just be displaced into our communities, according to a UCLA Mobility Study

[<https://www.stopthegondola.org/ucla-study>]

Response P702-106 Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, how the proposed Project supports Metro's goal of prioritizing equity opportunities, is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, how the public outreach for the proposed Project was designed with environmental justice principles in mind, how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety, and how the proposed Project is designed to be ADA compliant. Refer to Topical Response C, Project Features, for discussion of the proposed Project's 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, 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. Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. 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:

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

Comment P702-107 Need to fix the basics, invest in other less costly and less invasive/destructive options before investing all of this time and resources into this project that does not benefit our communities. Add bike lanes, fix sidewalks, build an escalator and staircase up the hill to Dodger Stadium. We support the preferred alternative, the Dodger Stadium Express bus service, but with modifications including electrification and more pickup locations, similar to the shuttle buses to the Hollywood Bowl or the LAX Flyaway bus. With The Gondola, LA ART is shifting the burdens of traffic and parking onto our communities and Chinatown. This is a huge injustice, as we are already burdened with the 110 FWY and the Hill Street/Civic Center offramp cutting through the communities. Our businesses need more support, not for this gondola to drive their existing customers away because they can't find parking.

Response P702-107.

Refer to Section 5.0, Corrections and Additions, of this Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which 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. While this alternative would provide improved pedestrian connections compared to existing conditions, the 25 minute plus travel time from the Metro L Line (Gold) Station to the location of the proposed Dodger Stadium Station would be at least nine times greater than the three minute travel time between those two locations with the proposed Project, and this alternative would be unlikely to attract substantially more people to walk to Dodger Stadium compared to existing conditions given the travel time and the physical exertion. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project.

Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express 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. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Further, as discussed in Topical Response H, a system of buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events 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 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. For example, the current Dodger Stadium Express service from South Bay serves a broad area of southern Los Angeles County at stations spread across eight miles, is free, and travels on a priority lane within the I-110 freeway median for most of its trip, but the South Bay Dodger Stadium Express 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. 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 the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project’s Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project’s stations..

Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines (“TAG”). Nevertheless, the 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..

Refer to Topical Response C, Project Features, discussing the proposed Project’s potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown 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 Chinatown and

other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve.

Comment P702-108 Our last full-service supermarket closed, in part, because the fee for their parking was going to be increased. If this gondola project is approved, we could soon find it impossible to find street parking. The paid parking lots, instead of having signs that say “\$5 all day” will say “\$20 all day”. This would be extremely detrimental for elderly people, whose families come to visit them on weekends, go to restaurants and bring them groceries and supplies. It would also hurt many disabled people who can park at parking meters for free. In 10 years, you might see many of our legacy and community-served businesses close down and replaced with businesses that cater specifically to tourists. These are the unintended consequences of allowing Frank McCourt to turn Chinatown into Dodger Stadium’s parking lot.

- “Linda Hang, 41, the daughter of the market’s owners, says their business suffered when the property owner started charging them several thousand dollars a month for use of the parking lot.”
<https://latimes.com/california/story/2019-09-22/chinatown-gentrification-grocery>

Response P702-108 Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region’s most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety. Refer to Response P702-107 for discussion of how parking is not required to be analyzed under CEQA or the TAG but the 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. The Parking Study determined that even with the addition of proposed Project vehicles parking in the area studied, publicly available parking on a game day would still be substantial, with an estimated 43 percent parking occupancy across the two half-mile station walksheds, and over 3,900 off-street parking spaces available to the community. 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. 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 P702-109 Chinatown has almost no bike lanes. This is probably because our communities were redlined and used as shortcuts for people driving into Downtown Civic Center. Our major north-south streets would have to lose a lane of traffic in order for there to be a bike lane, and this would impact traffic for commuters in and out of Downtown. Hill Street is like an onramp/offramp for the 110 FWY.

Response P702-109 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. 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. 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. 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/last-mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. As discussed in Section 2.0, Project Description, of the Draft EIR, the cabins would accommodate bicycles.

Comment P702-110 The draft EIR does not include an inventory of the trees that would have to be removed for this project. It appears that oak trees near a hill in the park, which files only 26 ft above the ground at that point, would have to be cut down. Aren't oak trees protected?

Response P702-110 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 Topical Response F, Los Angeles State Historic Park, for a discussion of tree removals required due to the proposed Project within Los Angeles State Historic Park. Refer to Appendix E, Biological Resources Assessment, of the Draft EIR, and Appendix K.1, Updated Tree Report, of this Final EIR for a tree inventory report detailing the removal and replacement of trees for the proposed Project. As discussed on page 3.04-23, in Section 3.04, Biological Resources, of the Draft EIR, and in Appendix K.1, Updated Tree 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. 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 P702-111 Contrary to what the developer says, this gondola project would have a dramatic, negative impact on our experience in the park. It would clutter our open skies. It would place an imposing 98 ft tall gondola station at the entrance of the park. As you walk into the park, 5-ton, 40-person gondola cabins would fly 40 ft over you. That would be your first experience as you walk into the park.

Response P702-111 Refer to Response P702-56 for a description of the location and design of the Chinatown/State Park Station. 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. ANSI B77.1 requires a vertical clearance of eight feet above grade where pedestrians are present. 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. 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. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park.

Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, for a discussion of the proposed Project's aesthetic impacts, which 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. 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. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the

Park, as well as the view of the downtown Los Angeles skyline, make the Park “visually memorable.” As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant.

Comment P702-112 Destruction of the entrance to LA State Historic Park, including the destruction of the grove of trees and the end of the riverbed at the entrance of the state park, in order to locate restrooms and concessions, is a huge environmental injustice.



Left: Google Earth View Annotated with LA ART’s Changes to Park Entrance

Right: Proposed Changes to LASHP Entrance – Image Taken from DEIR

Response P702-112 Refer to Response P702-110 for a discussion of tree removal at the Los Angeles State Historic Park, including coordination with California Department of Parks and Recreation regarding replacement. As noted on page 16 of Appendix E, Biological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, of the Draft EIR, “The BSA does not include water features falling under CDFW jurisdiction.”

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.

Comment P702-113 LASHP was a hardwon environmental justice victory. The Gondola could be iconic, but in a very bad way

(<https://www.latimes.com/california/story/2020-11-26/proposed-aerial-tram-for-dodger-fans-ignites-controversy-at-los-angeles-state-historic-park>). Allowing this gondola to invade our park would send a clear message that the park does not belong to the community; it belongs to a billionaire developer. The gondola's massive towers and stations would service as an iconic monument to injustice. Unlike the Metrocable in Medellin, which was considered symbolic of the government's investments in public infrastructure, the LA ART Gondola would be seen as a betrayal of our communities.



Screenshot of Image in the Park – Monument to the Creation of the Park

(<https://lastatehistoricpark.org/art-in-the-park/>)

Response P702-113 Refer to Response P702--111 for discussion of how, with the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park 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. 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. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world and their operations, integration with nearby residential and open space uses, features to enhance and provide additional benefits to the surrounding communities, promotion of public art and collaborations with local artists, and evidence that such systems can reduce violent crime in nearby areas and promote a sense of security compared to other modes of public transportation. 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 P702-114 LA ART states repeatedly in the DEIR that The Gondola flies over the “western edge” of the park, but that’s completely false. It travels over the heart of the park, over a very popular hill where people play and gather. Kids roll down the hill like logs. People sit and dogs play with each other. How are you supposed to relax and enjoy yourself if every 13 to 25 seconds, there’s a massive cabin full of people flying less than 26 feet over you with people literally looking down on you?

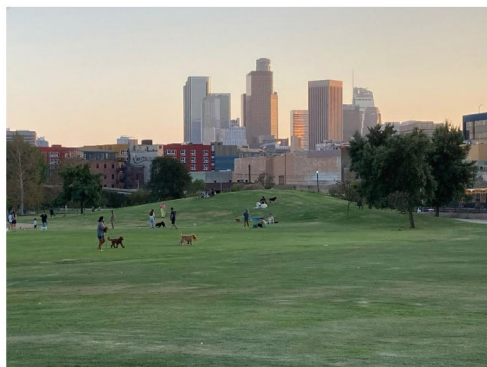


Photo – Popular Hill at LA State Historic Park

The LA ART Gondola would fly 26ft over this hill.



Close Up of Image in DEIR – Rendering of Gondola Cabin Flying Over Popular Hill at LA State Historic Park

For residents who live in a dense urban environment, LA State Historic Park is an escape and a hospitable environment, especially for those who have dogs. Walking a dog on Chinatown streets can be unpleasant. Sidewalks are narrow, have broken glass, have random garbage/food on the ground. The park is a place where people gather and dogs can interact with other dogs. It's a place where friends and families can get away and play. To add a massive gondola station at the entrance of LASHP that people will have to navigate around or under, and gondola cabins flying very low, as low as 26ft overhead, is a huge invasion and incompatible with current uses of the park. The gondola cabins, with their advertising on the exterior, will also be visually invasive.

Response P702-114 Refer to Response P702--111 for discussion of how, with the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park 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. 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. In addition, refer to Appendix H.2, Supplemental KOPs in Response to Comments, which includes 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. Refer to Topical Response K, Signage and Lighting, for discussion of the proposed Project's Sign Concept Plan included at Appendix B of the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR. 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.

Comment P702-115 The construction of the Chinatown / State Park Station would close the main pedestrian entrance and the general area by that entrance for over a year. People will either need to drive or will cross Spring Street farther north, where there is no crosswalk.

Response P702-115 As detailed in Section 3.11, Land Use and Planning, Section 3.17, Transportation, and Appendix B, Construction Assumptions, of the Draft EIR, during construction of the Chinatown/State Park Station, while a portion of the western sidewalk would be closed, a covered pedestrian sidewalk on the roadway along the western side of Spring Street would be provided to maintain pedestrian access.

Comment P702-116 Don't hold the bridge hostage.

- o LA ART is offering to build a bridge between Broadway and LA State Historic Park, but there is still no funding plan or budget for the gondola, so can they even contribute funds to a bridge? Tickets will apparently be free for Dodgers fans. There is no estimated ticket price for tourists. Apparently Frank McCourt intends to donate this project to Climate Resolve and is not going to pay for or finance this project. Who, then, is going to pay for it, and will the eventual owners be able to contribute funds to build the bridge?
- o The Gondola has nothing to do with the bridge. There is no reason to link these two projects together.
- o We want the bridge, not the gondola. We currently have to walk almost a half mile to walk to the park, even though we are across the street. We ask Metro, city, and state leaders to actively seek funding for the bridge from Broadway into LA State Historic Park because it will actually improve equitable access to parks for "underparked" communities, unlike the gondola, which only provides access to the Dodger Stadium parking lot.

Response P702-116 As discussed in Topical Response C, Project Features, while not proposed as part of the proposed 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, 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.

Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project.

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.

Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project, which provide access to more than the Dodger Stadium parking lot, and 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. 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. 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 P702-117 LA ART claims that The Gondola provides access to parks to “underparked” communities, but the parking lot at Dodger Stadium is not Elysian Park. Elysian Park is a sprawling hilly park. It is disingenuous to claim that the gondola provides access to Elysian Park when it drops people off at the far eastern edge of the parking lot.



LA ART's Route Map Laid Over google Map Showing Elysian Park. Elysian Park is big, hilly, & tough to access from the gondola station. What LA ART calls Elysian Park on their map is actually Parking Lot 2 at Dodger Stadium.

Response P702-117 As discussed in Section 2.0, Project Description, of the Draft EIR, at page 2-7, Elysian Park is the second oldest and largest park in the City and features hiking trails, a bike path, and various recreational and event facilities. The Dodger Stadium Station would be located on private property adjacent to Dodger Stadium in a portion of the existing parking lot in the southeast portion of the Dodger Stadium property near the Downtown Gate. The Dodger Stadium Station would include a pedestrian connection to Dodger Stadium, including hardscape and landscape improvements and potential seating, and a mobility hub 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/last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods.

Comment P702-118 Our communities already suffer from decisions of the past, including the decisions to divide Solano Canyon with the 110 FWY and split Chinatown with the Hill Street offramp, which is basically a shortcut for the benefit of Downtown and City Hall employees. Now, with this project, LA ART is proposing to cut through our communities' skies, the airspace over our homes and the state park that is an asset from decades of advocacy by both the Chinatown community and park activists.

Refer to Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefit 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. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park 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. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, how the proposed Project supports Metro's goal of prioritizing equity opportunities, is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, and how the proposed Project would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety.

Comment P702-119 Wildlife

We are concerned that the noise from the Broadway Junction was not evaluated in terms of scaring away wildlife in our neighborhood, especially small birds. We see many small birds in our neighborhood because we are sandwiched between Elysian Park and LA State Historic Park.

Response P702-119 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of how the operational noise impacts from the proposed Project would be less than significant. The Draft EIR addressed impacts to biological resources, including special status bird species from noise, in Section 3.04, Biological Resources with supporting data provided in Appendix E, Biological Resources Assessment, of the Draft EIR. As discussed on page 3.1-19, in Section 3.04, potential indirect impacts could include potential displacement of birds or bats from foraging, nesting, or roosting areas due to disturbance from noise and human activity associated with operation of the proposed Project. However, because the proposed Project would operate in a highly disturbed urban area, birds and bats are unlikely to

be impacted by the relatively minor change in environment. Thus, the analysis in the Draft EIR determined that impacts to special status species, including bird species, would be less than significant with incorporation of Mitigation Measure BIO-B to reduce potential project-related impacts to nesting birds. Further, as discussed in Appendix G, Supplemental Biological Resources Report, common wildlife species would be expected to utilize adjacent habitats, and substantial population level impacts to common species is not expected. Refer to Responses S1-4 through S1-15 for a discussion of the additional PDFs incorporated as part of the proposed Project to provide additional environmental benefits to biological resources. For example, as discussed therein, the proposed Project would implement BIO-PDF-B. 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.

Comment P702-120 It appears that mature trees will need to be cut down at the entrance of LA State Historic Park. We are concerned at that end of the park. But cutting down those trees, less wildlife will be at the southern entrance of the park, which is the most accessed portion for people arriving on foot or by transit.

Response P702-120 Refer to Response P702-110 for a discussion of tree removal at the Los Angeles State Historic Park, including coordination with the California Department of Parks and Recreation regarding replacement. As discussed in Section 3.04, Biological Resources, of the Draft EIR, the BSA surrounding the proposed Chinatown/State Park Station consists of paved roadways, sidewalks, the elevated Metro L Line (Gold) structure, and buildings. In addition, “a review of historical aerial imagery indicates ... that” trees “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, these trees are only approximately seven years old. Further, as discussed in Appendix G, Supplemental Biological Resources Report, of this Final EIR, given that the trees proposed for removal are primarily non-native tree species, the quality of wildlife habitat provided by these trees is relatively low, providing a relatively small amount of wooded habitat at the western end of the Los Angeles State Historic Park, especially 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, Dodger Stadium Property, and Point Grand View Park. 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. As the commenter recognizes, this area is already frequently disturbed by humans, further rendering the area unsuitable for the presence of wildlife. As discussed in Section 3.11, Land Use, of the Draft EIR, the Chinatown/State Park Station would be located in the southernmost portion of the

Los Angeles State Historic Park approximately 500 feet from the Metro L Line (Gold) Station and surrounding existing and approved land uses include a mix of residential, commercial, and industrial that naturally encourage pedestrian activity. Additionally, as discussed in Section 5.0, Other CEQA Considerations, of the Draft EIR, the Los Angeles State Historic Park can host large events with up to 25,000 people and smaller monthly events of 500 to 5,000 people, including concerts, movie screenings, and the farmer's market.

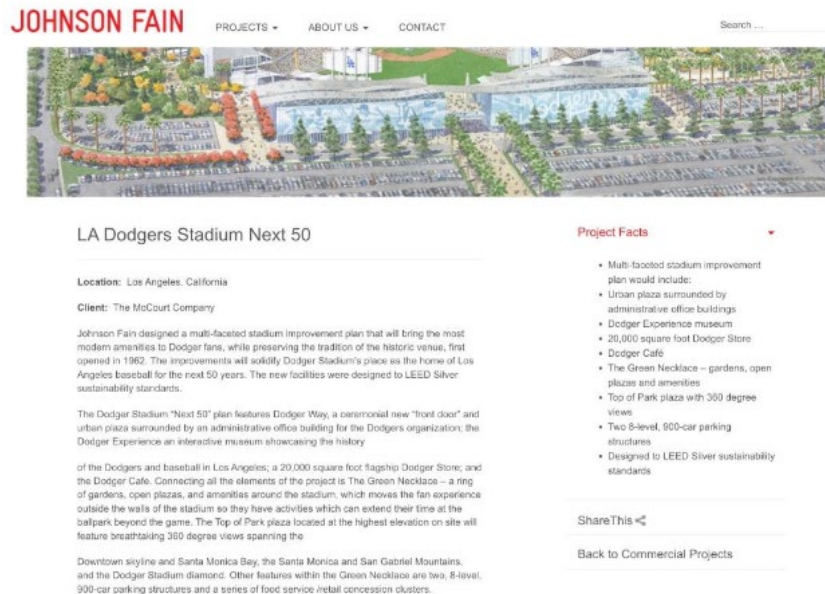
Comment P702-121 Future development

This project will lead to future commercial development in Chavez Ravine, without community input and without disclosure to the community. This is a foreseeable consequence of The Gondola, especially considering policies and laws that incentivize development near major transit stops. The Draft EIR fails to provide an analysis of the environmental impacts of development in Chavez Ravine. While The Applicant claims that there are no current plans for development, news articles that reported the terms of the sale of the Dodger Stadium parking lot do.

- “How Frank McCourt Made \$2 Billion From The Los Angeles Dodgers And Team Remains Saddled With Debt.”
- “In addition to another sports facility, the potential property uses cited in the document include homes, offices, restaurants, shops, entertainment venues, medical and academic buildings, and a hotel and exhibit hall.”

<https://www.latimes.com/sports/la-xpm-2012-may-04-la-sp-0505-dodgers-land-20120505-story.html>

- “Mccourt has the right to sell his 130 acres to Guggenheim for another \$150 million, or can buy back part of the land in order to build a sports venue there.”
- <https://www.forbes.com/sites/mikeozanian/2013/06/15/how-frank-mccourt-made-2-billion-from-the-los-angeles-dodgers-and-team-remains-saddles-with-debt/?sh=40ac62921249>
- Next50 Plan – Johnson Fain
<https://johnsonfain.com/projects/architecture/commercial/la-dodgers-stadium-next-50/>



Screenshot of Johnson Fain Website – LA Dodgers Next 40

Response P702-121 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. Refer to 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, for discussion of how the proposed Project solely proposes an aerial gondola system. 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. Further, as discussed in Topical Response G, the “Next 50” project was proposed over 15 years ago and did not proceed after 2008. 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. Further, as discussed in Topical Response G, the purported “future” development that commenters suggest is contemplated at Dodger Stadium 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. Moreover, mere statements from a website or actions from over a decade ago, and speculative comments attempting to assign a motive to such actions, do not evidence a firm and specific commitment to develop the property surrounding Dodger Stadium. 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 omit foreseeable development from its analysis, and CEQA expressly discourages such speculation.

Comment P702-122 Prior to turning the land into the Dodger Stadium parking lots, there were plans to build public housing on that site. Public housing was the reason the residents of La Loma, Bishop, and Palo Verde were evicted from their land, which robbed them of their opportunity to build generational wealth. The descendants of this area should have a say as to what happens to this land should it no longer be needed for Dodger Stadium parking.

Response P702-122 Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of outreach and community engagement during the Draft EIR public review period and community engagement efforts during the preparation of the Final EIR.

Comment P702-123 The Draft EIR also fails to provide analysis of the environmental impacts of turning the Dodger Stadium parking lot into a park-and-ride lot for events at LA State Historic Park and for access to Metro's regional rail network at Union Station. The use of Dodger Stadium as a park-and-ride lot was discussed at Metro's November 16, 2022, Ad Hoc Olympics Committee meeting. This is yet another foreseeable use of The Gondola that would bring additional traffic congestion, greenhouse gas emissions, and pollution into our already overburdened neighborhoods.

Response P702-123 Refer to Response P702-3 for a discussion of Metro's November 16, 2022, Ad Hoc Olympics Committee meeting. Based upon a review of this meeting, no member of the Ad Hoc 2028 Olympics Committee discussed the potential for using Dodger Stadium as a parking location for the 2028 Olympics. Rather, this commenter raised the possibility themselves during public comment at the meeting. Accordingly, the mere speculation of a single commenter does not mean that Dodger Stadium could be considered as a proposed parking location for the 2028 Olympics such that the Draft EIR should have considered the use of Dodger Stadium as a park-and-ride. This is not a reasonably foreseeable consequence of the proposed Project, as the Los Angeles Dodgers manage the Dodger Stadium parking lot and would have to approve any deal to use the parking lot. Such an agreement is entirely separate from the proposed Project's operations, and the mere possibility that the Dodger Stadium property could be used in such a manner is too speculative to require the analysis in the EIR for this aerial gondola system.

Comment P702-124 This project will likely result in the loss of the 100+ housing units that were planned for the 1201 N Broadway site, where the Broadway Junction would be located. The DEIR shows a rendering of a possible housing development incorporated into the Broadway Junction, but building housing at a station, especially one that

includes the drive motor, involves vibration and noise isolation and additional engineering, which means additional cost. Given that no funding plan has been presented for this project, we are skeptical that LA ART would be able to build a project that incorporates housing into that site.

Response P702-124 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 uses,. As discussed in Section 2.0, Project Description, of the Draft EIR, 1201 North Broadway is location of the proposed Project's Broadway Junction, a non-passenger junction. Refer to Section 5.0, Other CEQA Considerations, of the Draft EIR, for an analysis of the proposed Project's cumulative and potential growth inducing impacts. Pursuant to Section 15130(b)(1)(A) of the CEQA Guidelines, a list of past, present, and probable future projects producing related or cumulative impacts was used as the basis for the Draft EIR's cumulative impacts analysis. As shown on Table 5-1, Related Projects, a mixed-use redevelopment project at 1201 North Broadway, i.e., the location cited in the comments as a potential development site, was analyzed as a related project for the Draft EIR's cumulative impacts analysis. All approved and proposed related projects relevant to the cumulative analysis for the proposed Project were included in Table 5-1. Accordingly, the proposed Project considered the potential for this related project and considered integration of design to enable the proposed housing project to move forward. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing.

Comment P702-125 SB44

This is not a public transportation project. It is a private transportation project that serves a private property. In addition, Dodger Stadium is not an Olympics venue. For these two reasons, we do not believe that this project qualifies for SB44, and we object to the use of this law as yet another means to fast-track this project.

Response P702-125 Refer to Topical Response A, SB 44, for discussion of the proposed Project's consistency with the requirements of Senate Bill (SB) 44. The proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Comment P702-126 Preferred Alternative – Enhanced Dodger Stadium Express (DSE)

On page 14 of Appendix N – Transportation, “While the DSE has travel time benefits associated with the bus lanes on Sunset Boulevard, it experiences congestion at gate entrances to Dodger Stadium because there are no dedicated lanes at the entrances, and the DSE and transportation network companies (TNC) like Uber and Lyft use the same parking booth as the DSE”. These problems must be resolved. There should be dedicated bus lanes at the entrances and DSE should not share a booth with Uber and Lyft. We hope that the managers of the parking lot can make these improvements.

Response P702-126 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express. 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. 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 the Dodger Stadium Express. 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.

Comment P702-127 Replacing the DSE with electric buses will also make this zero emissions transit.

We also suggest expanding the DSE service with additional satellite locations where people can access the service, similar to how the LAX Flyaway shuttle can be taken from several locations. This would eliminate transfers for many people. Metro knows how important it is to eliminate transfers. Metro spend billions on the regional connector to provide people with a “1-seat ride.” The DEIR only considers stationing buses at Union Station, which means that transfers are almost always a part of accessing Dodger Stadium via The Gondola.

Response P702-127 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Further, as discussed in Topical Response H, a system of buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events 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 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. 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.

Comment P702-128 Additional Comments

It is stated repeatedly in the DEIR that gondola systems are proven technology and operating successfully around the world as urban rapid transit. The use of aerial cable cars for urban transit still has many open questions and gaps in research according to a scientific literature review by Flessner and Friedrich published in October 2022 entitled, “Are We Taking Off? A Critical Review of Urban Aerial Cable Cars as an Integrated Part of Sustainable Transport.”

(<https://www.mdpi.com/2071-1050/14/20/13560>). Proponents of the LA ART Gondola often point to the transformative effects of the gondolas in Medellin, Columbia. The changes in Medellin, however, were also supported by complementary investments that were six times the cost of the Metrocable gondola. “In contrast to previous studies focusing mainly on cable car costs themselves, a study revealed that the complementary costs for urban improvement projects in Medellin were approximately six times the costs of the cable car itself, not considering the additional expenses for local social programs.”

Response P702-128 Although forms of aerial transit technology have been available and utilized for the last 100 years, modern applications have seen the evolution of the technology as a feasible mode of urban rapid transit. As discussed in the Technology Penetration Analysis, included in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, a large capacity for a new mode of transportation in Los Angeles will allow passengers to see the potential for other emerging innovations to be integrated into the public transit system, and the proposed Project would thus exemplify how alternative transportation technology can be integrated into a city’s transportation infrastructure and will show that new technology can successfully operate in concert with other existing modes of transportation. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world and their operations, integration with nearby residential and open space uses, features to enhance and provide additional benefits

to the surrounding communities, promotion of public art and collaborations with local artists, and evidence that such systems can reduce violent crime in nearby areas and promote a sense of security compared to other modes of public transportation. As discussed therein, 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. 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. 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. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of additional studies analyzing aerial transit systems around the world, including their effects on local businesses, crime reduction, and social mobility.

Comment P702-129 We disagree with the conclusion in Appendix H – Energy Technical Report. We contend that The Project would result in a significant impact due to unnecessary consumption of energy resources because this entire project is unnecessary. (See Preferred Alternative – Enhanced Dodger Stadium Express (DSE).)

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. 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. 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. Refer to Section 3.06, Energy, and Appendix H, Energy Technical Report, of the Draft EIR for discussion of how the proposed Project would have a less than significant impact on energy resources. Refer to Topical Response A, SB 44, for discussion of how 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, pursuant to GHG-PDF-A. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express 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.

Comment P702-130 Conclusion

This project is not for our communities. This project is for Frank McCourt who is a developer, it's for the Olympics, which is for developers, and it's for the politicians who are in the pockets of developers. Frank McCourt wants to build 40 ft over our neighborhood.

There have been so many lies about this project from LA ART, withholding information, and misleading statements. But we know what this project is really about. Frank McCourt has long wanted to build a retail and entertainment complex at the Dodger Stadium parking lot. A permanent transit stop would provide incentives to build bigger there. This gondola is to serve those ambitions and not the residents and businesses of the surrounding communities.

Response P702-130 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.

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. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Refer to 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 for

a discussion of how the proposed Project solely proposes an aerial gondola system. 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. Refer to Topical Response C, Project Features, for discussion of the proposed Project's 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, 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 Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Comment P702-131 This project makes no sense for serving events and games at Dodger Stadium. At maximum capacity, it can only handle a fraction of the attendance at Dodger Stadium. Most people will not want to take public transit home late at night and will drive to the gondola instead. Maybe some will take transit, but these are probably the same people who would have taken the Dodger Stadium Express, which we support.

Response P702-131 Refer to Response P702-29 for an overview of the need for the proposed Project. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation.

Comment P702-132 The preferred alternative, enhancement of the Dodger Stadium Express bus service can be improved and expanded further than was explored in the DEIR. The bus service also does not have any of the negative impacts associated with The Gondola, including unavoidable construction noise and vibration, destruction of the entrance of LA State Historic Park, operating noise in our neighborhoods, invasion of privacy, safety and security risks, shifting of traffic and parking burdens from Dodger Stadium into Chinatown, and transfer of public property to a private entity. Rather than force this urban cable car experiment on our communities, an experiment we never asked for, there should be a comprehensive study to improve access to Dodger Stadium, a study that includes not only the expansion and electrification of the

Dodger Stadium Express bus service, but also more bike lanes, better sidewalks, and an escalator up the hill for pedestrians. Clearly, the Dodger Stadium Express needs to continue to be available in order to serve as a backup to The Gondola, so let's build upon what we already have, our existing infrastructure (the many wide roads into Dodger Stadium), and make it much better.

Response P702-132 This comment provides a general summary of the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses P702-1 through P702-131. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express. 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. 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 the Dodger Stadium Express. 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. 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.

Comment P702-133 This project is a shame. If you're standing up and supporting this, you're teaming up with Frank McCourt who bankrupted the Dodgers. You're teaming up with those who erased the original Chinatown to build Union Station. You're teaming up with those who evicted the residents of La Loma, Bishop and Palo Verde for public housing, and then gave the land over to build Dodger Stadium. You're choosing that side of history.

Response P702-133 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. 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. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine.

Comment P702-134 We respectfully ask that LA ART and Metro respond to all of our comments throughout this letter, not simply the specific impacts listed. We ask this project be

placed on hold until a feasibility study is published and a funding plan is released. Certainly, if the project is well-defined enough to be in the environmental review, there is no reason that these two documents cannot be made public, even in draft form. A new DEIR should be released that addresses the omissions and shortcomings identified in the comment letters.

Response P702-134 All comments within the letter have been responded to in this Final EIR. In addition, the Draft EIR itself serves as a “feasibility study” for the proposed Project, analyzing the proposed Project’s potential environmental impacts. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project’s potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project’s environmental impact. (See, e.g., CEQA Guidelines § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project’s potential environmental impacts. CEQA does not require “a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters” and lead agencies are not required to “provide all information requested by reviewers.” (Id., § 15204.) This comment does not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P702-135 Our communities should not be sacrificed for an aerial transit experience. Rather than create “a cultural landmark that enhances the visibility of Chinatown” as LA ART’s supporters contend, The Gondola would serve as a monument to the modern-day exploitation & marginalization of our communities by a billionaire developer & our elected leaders. The LA ART Gondola would be an embarrassment and an iconic symbol of injustice.

The solution is for Metro and for our elected leaders to deny approval of this project. Work with our communities on common sense solutions to improve traffic and provide other options to get to Dodger Stadium. Please STOP THE GONDOLA.

Sincerely,

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

Response P702-135 This comment provides a general conclusion regarding comments raised in this letter. Responses to the comments contained in this letter are provided in Responses P702-1 through P702-134.

Comment Letter P703 – Yuval Bar-Zemer

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to P703

Comment P703-1 Dear Mr. Zelmar:

This letter is submitted by myself, a citizen of the City of Los Angeles who lives and work in proximity to the proposed Los Angeles Aerial Rapid Transit Project (the “Project”) in response to the release of the Project’s Draft Environmental Impact Report (“Draft EIR” or “DEIR”).

Response P703-1 This comment provides a general introduction regarding the comments raised in this letter. Responses contained in this letter are provided below in Responses P703-2 through P703-14.

Comment P703-2 I. GENERAL COMMENTS

- A. Metro fails to analyze the impact of a private company operating a transit system in the public realm.
- a. After reviewing the entire report, I have not seen a single document detailing ANY hours of operation let alone detailed and specific hour per day, or days of operations per year! Many of the reports would vary drastically if the Aerial Tram operated only during game days, and only for 6 hours during a game day versus being operational 14 hours per day.

Response P703-2 The Draft EIR discussed hours of operation in Section 2.0, Project Description, of the Draft EIR. The proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. 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, the proposed Project is anticipated to provide daily service between 6:00 a.m. and 12:00 a.m., subject to operational changes in response to ridership demand. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. The proposed Project operations were analyzed in Section 3.0, Environmental Setting, Impacts, and Mitigation, of the Draft EIR, and as summarized in the Executive Summary of the Draft EIR, impacts related to operations of the proposed Project would be less than significant.

Comment P703-3

- b. Following the above lack of clarity or commitment by a private company (LAART) fails to identify the business model that would dictate the hours of operation and the cost to the public. This is necessary to determine the feasibility for the operator, and assuming the LAART provides a contractual commitment to a schedule and a cost per passenger, many of the reports may need to be revised! Here are just a few examples:

Response P703-3

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. Refer to Response P703-2 for discussion of the anticipated operating hours and analysis of the proposed Project. 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 be free to ride for anyone with a ticket to a Dodger game.

Comment P703-4

- i. The calculation of the energy use would change dramatically (486 hours of operations annually, if it services game days only vs 4,380 hours of operations annually if it is a public service).

Response P703-4

Refer to Response P703-2 for discussion of the anticipated operating hours and analysis of the proposed Project. Refer to Section 3.06, Energy, and Appendix H, Energy Technical Report, of the Draft EIR, for a discussion of the proposed Project's potential energy-related impacts, concluding that the proposed Project would not result in a significant impact. Refer to Response P703-8 for further discussion of the energy related- impacts of the proposed Project and ridership. The proposed Project has evaluated and developed a reasonable basis for anticipated ridership that accounts for energy consumption during periods of varying usage intensities, such as during game days and non-game days. The energy consumption assumed in the Draft EIR's analysis of energy consumption was based on the anticipated usage of the system and assumes the highest anticipated ridership, though energy demand for the proposed Project would vary in relation to ridership volumes. The proposed Project is anticipated to have less than significant impacts related to energy based on the highest anticipated usage. The Draft EIR evaluated the proposed Project's energy related- impacts against the relevant significance thresholds from Appendix G of the CEQA Guidelines and found those impacts to be less than significant, concluding that the proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources, nor would it conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

Comment P703-5

- ii. The reduction in vehicle trips is directly related to the hours of operation and the cost of the ride. Since none of this data is provided in a form that

can be analyzed, how can we make any assumptions on attendee's behavior.

Response P703-5 Refer to Response P703-2 for discussion of the anticipated operating hours and analysis of the proposed Project. The VMT analysis was conducted for both daily (daily weekday and daily weekend) and annually, as shown in Tables 3.17-4 and 3.17-5 of the Draft EIR, respectively. The annual VMT represents the VMT reduction benefit across a whole year, associated with Dodger Game Days. As described in pages 3.17-34 through 3.17-36 of the Draft EIR, the tourism ridership, the Los Angeles State Historic Park visitors and event attendees, and neighborhood transit users were not quantified in the annual VMT reduction calculation in order to ensure a conservative analysis. Additionally, the model inputs and assumptions that were used to estimate ridership for games and events at Dodger Stadium were conservative as well. Including the additional market segments that were not included in the quantitative VMT analysis, users in the annual VMT analysis would have resulted in a greater VMT reduction than reported in the Draft EIR. 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 be free to ride for anyone with a ticket to a Dodger game.

Comment P703-6 iii. The length of hours of service during game days are assumed to be 2-3 hours before the game, and 2-3 hours after the game. In a perfect world and according to the capacity of the system, it could deliver 15,000 people to the stadium before the game and 15,000 back to Union Station. This assumption is flawed as there was no study conducted to determine a person's willingness to wait more than an hour to start their trip home. The project fails to analyze its and Metro's capacity to actually deliver 15,000 passengers to their desired destination withing the 3-hour window. Without such study the assumption of the number of passengers using this new mode of transportation is an uneducated guess and therefore cannot support any assumptions on the reduction of Vehicle mile traveled (VMT).

Response P703-6 Refer to Response P703-2 for discussion of the anticipated operating hours analysis of the proposed Project. As discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). While the capacity of the system over three hours could be 15,000 pphpd, as detailed on page 3.17-35 of the Draft EIR, the ridership associated with game/event attendees is forecast to be 6,000 riders in 2026 and 10,000 riders in 2042, not the 15,000 passengers referred to by the commenter.

Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership

model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation. Post-game queues at Dodger Stadium were estimated based on assumptions about the departure patterns and estimates of walk times from the various seating areas within the stadium. 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 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 in Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, 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. 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 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.

Comment P703-7

- iv. The impact on a public that is enjoying the park at all hours of the day, would be very different on game days versus every day.

Response P703-7

As discussed in Section 3.17, Transportation, of the Draft EIR and Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, the majority of the riders using the Chinatown/State Park Station on game days would be transferring from the Metro L Line (Gold) Station. These riders would walk along Spring Street to the Chinatown/State Park Station at the southernmost portion of the Los Angeles State Historic Park. Therefore, these riders would not affect park users. Moreover, the proposed Project would provide an additional transit option to riders visiting the Los Angeles State Historic Park, including for events at the park. Further, 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 Los Angeles State Historic Park.

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 P703-8

- v. The efficiency of operating the Gondola will vary dramatically if it operates every day. Even if the use is minimal, the average use of KW per passenger will grow dramatically amounting to a massive waste of energy.

Response P703-8

Refer to Section 3.06, Energy, and Appendix H, Energy Technical Report, of the Draft EIR, for an evaluation of energy-related impacts of the proposed Project. The proposed Project has evaluated and developed a reasonable basis for anticipated ridership that accounts for energy consumption during periods of varying usage intensities, such as during game days and non-game days. The energy consumption used in Appendix H was based on the highest anticipated ridership, though energy demand for the proposed Project would vary in relation to ridership volumes. The proposed Project is anticipated to have less than significant impacts related to energy based on this basis of ridership. Additionally, in Section 3.06, Energy, determined that the proposed Project would not result in wasteful use of energy.

Comment P703-9

- c. What is the impact of this project when a private company goes out of business? Who will pay to remove the “scar” that was created in the skies of Angelenos. How would we calculate the many environmental impacts? If the Aerial Tram operating company goes out of business, would government step in to run an inefficient, money losing model just to maybe get dodger fans to a game?

Response P703-9

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. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of this Final EIR, which 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project. CEQA does not require speculation as to possible future environmental consequences, and the Draft EIR need not analyze uncertain, hypothetical future events.

Comment P703-10

- d. The reduction in GHG is based on a number of assumptions: That in the future the electricity would be generated from 100% renewable sources. It also looks to a horizon of 2042. I am assuming the study is based on the mandatory requirement that a utility company be 100% renewable by that date or before. However, the State of California's mandate that all vehicles stop producing GHG by 2035, so even if this project is not implemented, the GHG reduction will be reached within a similar time frame. That change in private vehicles has not been made a factor in the calculation of GHG reduction.

Response P703-10

Refer to Section 3.06, Energy, and Appendix H, Energy Technical Report, of the Draft EIR, for a discussion of how power requirements for the proposed Project would be supplied through LADWP's Green Power Program, which is derived from renewable resources. The use of 100% renewable power from the Green Power Program is a voluntary commitment by the proposed Project to further demonstrate the proposed Project's leadership towards sustainable transportation. This commitment is accurately captured in the proposed Project's GHG analysis provided in Section 3.08, Greenhouse Gas Emissions, of the Draft EIR. 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. The addition of GHG-PDF-A has been incorporated into Section 5.0, Corrections and Additions, in this Final EIR. The mobile source emissions in the Draft EIR were estimated using the latest version of the California Air Resources Board's mobile source emission factor model (EMFAC2021). EMFAC2021 was designed to account for the effects of all reasonably foreseeable and quantifiable federal and state regulations related to on-road mobile sources. Thus, the analysis accounts for what the state believes is a reasonable anticipation of what the vehicle fleet looks like in the future. Executive Order N-79-20 mandates that new vehicles sold in California be zero-emission by 2035. This comment does not accurately represent the regulation because the Executive Order does not mandate that all vehicles in California stop producing emissions. Additionally, the mobile source emissions in the Draft EIR demonstrate consistency with CARB's 2022 Scoping Plan Update addressed on page 3.8-5 of the Draft EIR. The update to the Scoping Plan accounts for the electrification of California's mobile vehicle fleet mandated under Executive Order N-79-20 and widespread adoption of zero-emission vehicles (ZEVs). These measures under the updated Scoping Plan are aimed at reducing GHG emissions from on-road vehicles. By supporting VMT reduction through offering an innovative, alternative mode of transportation, the proposed Project advances state-wide policies aimed at reducing on-road mobile GHG emissions. Further, as an innovative transportation project that will reduce VMT over time, the proposed Project helps advance local and state climate and transportation policies. Refer to Section 3.08, Greenhouse Gas Emissions, and

Tables C-1 through C-4 in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, for additional discussion.

Comment P703-11

- e. The bus service that offers a shuttle from union station to Dodger Stadium, is very popular and can be easily scaled without massive infrastructure spending or its associated impacts. Why is this not an alternative that was studied in detail. (It would qualify as the “No project” alternative as the components are already in place. (Appendix N refers to the Dodger Express as a static number that can not change and ignores in its time calculation the first mile driven (in other words, it gives the example as if the trip starts at the gold line station in south Pasadena and not in the persons home or office)

Response P703-11

Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, and Section 4.0, Alternatives, of the Draft EIR, for a discussion of how the Transportation Systems Management (“TSM”) Alternative for an enhanced Dodger Stadium Express 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. CEQA requires the No Project Alternative to determine the consequences of not implementing the proposed Project. The TSM Alternative does not qualify as a No Project Alternative as it would require considerable increases to bus frequency and passenger loading capacity, which would necessitate additional buses and high-capacity loading facilities. Appendix N, Transportation Appendices, of the Draft EIR, includes a detailed memorandum summarizing the data and methodology for developing ridership estimates. Data from the Dodger Stadium Express was used to develop and calibrate the ridership model. The comment states that Appendix N “refers to the Dodger Stadium Express as a static number that cannot change and ignores in its time calculation the first mile driven.” This is not accurate and may be a misinterpretation of how the Dodger Stadium Express travel time of 25 minutes, including transfer time shown on page 5 of Appendix N, was used. The 25 minutes is only for the Dodger Stadium Express portion of a trip. For Dodger Stadium Express riders who arrive at LAUS via automobile, the travel time between the zip code of origin and Union Station was calculated using the GIS ESRI’s “Routable Network,” as described on page 4 of Appendix N, and was added to the Dodger Stadium Express travel time. For Dodger Stadium Express riders who arrive at LAUS via transit, also as described on page 4, the travel time between the zip code of origin and LAUS was calculated using Metro and Metrolink timetables plus transfer penalties if the transit trip requires a transfer, wait time(s) for train(s), and travel time to the transit station origin, all of which was added to the Dodger Stadium Express travel time. Thus, first mile driven was included in the estimates. As noted on page 9 of Appendix N, Model

Documentation memorandum, the ridership model was calibrated to replicate existing conditions of the Dodger Stadium Express.

Comment P703-12

- f. The project proponents are portraying this public transportation system as something “normal” that has been implemented in many places around the globe however, the project fails to provide detailed comparisons to other the projects, explaining the inefficiency of the proposed model.

Response P703-12

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. Refer also to Table 2-1: ART Precedents, in Section 2.0, Project Description, in the Draft EIR, which depicts other ART systems in place in various cities around the world. Although forms of aerial transit technology have been available and utilized for the last 100 years, modern applications have seen the evolution of the technology as a feasible mode of urban rapid transit. As discussed in Section 2.0, Project Description, of the Draft EIR, 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. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project’s ridership model which is based on extensive data sources and assumptions validated by data. Finally, as discussed in the Technology Penetration Analysis, included in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, a large capacity for a new mode of transportation in Los Angeles will allow passengers to see the potential for other emerging innovations to be integrated into the public transit system. The proposed Project would thus exemplify how alternative transportation technology can be integrated into a city’s transportation infrastructure and will show that new technology can successfully operate in concert with other existing modes of transportation.

Comment P703-13

- g. The study alludes to the positive effect of such a project as a way to educate the public on a new type of “innovative” public transportation. However, the study fails to analyze the impact on the public; where the public space on grade has been dominated by transportation, the space below grade is taken for transportation and is now the last bit of “free” space left for the public to engage with nature We are being compromised by an “innovation” that may be attractive to a few for their own selfish devices. What a nightmare!

Response P703-13

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 Los Angeles State Historic Park. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. Accordingly, the Draft EIR more than adequately complies with CEQA's requirements for a Draft EIR.

Comment P703-14

- h. The DEIR has concluded that there are no significant view impacts as a result of the aerial tram. I have attached few screen shots of a 3D model that represents the Aerial tram, and the China town station as seen from the park. For a park that is designed to have open skies, such conclusion appears to be absurd. The fact that the study did not provide a 3D digital tool for the public to be its own judge on the view impact may explain why the proponent selectively picked a few convenient spots to render (out of a 3 D model that clearly was not make available for public viewing.

Yuval Bar-Zemer

Response P703-14

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, which would be less than significant. As outlined in Section 3.01, Aesthetics, of the Draft EIR, 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). Further, views and potential impacts were analyzed using thresholds of significance identified by the CEQA Guidelines and the L.A. CEQA Thresholds Guide. As a part of the analysis, a series of visual simulations were conducted from/within Landscape Units (LU) and Key Observation Points (KOPs) that were delineated and identified based on known significant views and locations with proposed changes to the setting. Refer to Appendix H.1, Memo Regarding Preparation of KOPs, for discussion of the methodology used to prepare the KOPs for the Draft EIR. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including additional simulations of the park to further analyze viewshed impacts to the Park. 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. As discussed therein, a 3D digital model of the proposed Project's surrounding urban context was prepared using ArcGIS software with source data from the United States Geological Survey (USGS) Digital Elevation Model for the topography, and from Los Angeles Region Imagery Acquisition Consortium (LARIAC) for the building locations, footprints, and height extrusions. This context model allowed the preparer of the KOPs, RIOS, to accurately place the proposed Project 3D digital model into context without distortion. RIOS then rendered the proposed Project 3D digital model in perspective

to match the KOP vantage point, and place the rendered component into the existing photo via photoshop. This process allows the KOPs to realistically illustrate what the proposed Project will look like in the surrounding context. The “screen shots” of the “3D model” referenced in this comment do not appear to have followed a similar methodological approach, and accordingly do not realistically illustrate what the proposed Project will look like in the surrounding context as compared to the KOPs used to form the basis for the analysis in the Draft EIR. The Draft EIR complied with CEQA’s requirements, providing the necessary analysis in the Draft EIR’s main sections to adequately inform the public and decision makers regarding the proposed Project and its potential environmental impacts. CEQA does not require that the Draft EIR include a 3D digital model for interactive use by the public.

Comment Letter P704 – Don Luis Camacho

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to P704**Comment P704-1** Dear Mr. Zelmer

I am writing in support of the LA ART project ? it is an innovative new mode of transportation that will help us meet our climate goals. My Company, Camacho?s Incorporated, has been headquartered at El Pueblo de Los Angeles Historical Monument since 1984 when my father, Andy Camacho, purchased El Paseo Inn Restaurant on Olvera Street. My family and I continue to own and operate that restaurant. We have so much pride for the history and culture that exists on Olvera Street, but each year it continues to be more and more challenging to attract new customers. In addition, the last few years have been extra challenging due to COVID-19. I believe that LA ART would help bring new life to Olvera Street, attracting new patrons and create a destination for El Pueblo. I will continue to advocate for the project and look forward to working with the project proponents and Metro to ensure we have community benefits that will help me and all the merchants along Olvera Street.

Response P704-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Although forms of aerial transit technology have been available and utilized for the last 100 years, modern applications have seen the evolution of the technology as a feasible mode of urban rapid transit. As discussed in the Technology Penetration Analysis, included in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, a large capacity for a new mode of transportation in Los Angeles will allow passengers to see the potential for other emerging innovations to be integrated into the public transit system, and the proposed Project would thus exemplify how alternative transportation technology can be integrated into a city’s transportation infrastructure and will show that new technology can successfully operate in concert with other existing modes of transportation. Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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. Additionally, the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. Refer to Topical Response C, Project Features,

discussing the proposed Project's potential partnerships with and benefits to local 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. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, 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. For instance, as discussed in Section 5.0, Other CEQA Considerations, of the Draft EIR, the location of the proposed Project's Alameda Station optimizes pedestrian access. 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.

Comment P704-2 Given my interest to the project, I have reviewed the DEIR, and have a few questions I look forward to the project team answering.

Response P704-2 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. Responses to the comments contained in this letter are provided in Responses P704-1 and P704-3.

Comment P704-3 Given the proposed proximity of construction to my family's restaurant and the other Olvera Street merchants, what steps would the project take to make sure that businesses are not negatively impacted during construction? How will road and sidewalk closures be handled? Will access be maintained, or detours provided? I look forward to hearing about mitigation planning during a construction phase.

Thanks,

Don Luis Camacho

DON LUIS CAMACHO

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Response P704-3 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 pages 3.17-50 through 3.17-52 for discussion of how during construction of the proposed Project's Alameda Station, pedestrian access to Olvera Street businesses would be maintained throughout construction. Pursuant to Mitigation Measure TRA-B, the proposed Project will prepare a detailed Construction Traffic Management Plan (CTMP) including street closure information, detour plans, haul routes, and a staging plan, which shall be prepared and submitted to the City for review and approval prior to construction. 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. As traffic lane, parking lane, and sidewalk closures are anticipated, worksite traffic control plans, approved by the City, shall be developed and implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures. Additionally, 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.

Comment Letter P705 – Colleen Meyers

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P705

Comment P705-1 My name is Colleen and I live really close to where the gondola would be at the Llewellyn Apartments. I board at College Station every day to get to work in West Hollywood. One of my favorite things to do is relax at the State Park after working 50hrs a week. The gondola would ruin that by putting enormous support towers in the sky where people go to enjoy nature and be healthy.

Response P705-1 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. 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, which would be less than significant.

Comment P705-2 Is there any data on the noise this would emit? College Station is already so loud, you can hear it from the entrance of the park and it's not relaxing there at all. I feel like the gondola cars would just make that worse and ruin the area for everybody.

Response P705-2 This comment is noted and will be provided to the decision makers for review and consideration. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the operational noise impacts

from the proposed Project, including in the Los Angeles State Historic Park, identified in the evaluation of noise impacts as Noise Sensitive Receptors (NSR) 14N and 14S. To provide a conservative operational noise analysis, the worst-case scenario was selected which represents a Dodger Game Day, with the highest line speed, cabins per hour, and queuing numbers, and with nighttime operations. Tables 3.13-22, 3.13-23, and 3.13-24 on pages 3.13-53 to 3.13-57 of Section 3.13, Noise, of the Draft EIR demonstrate that operational noise impacts would be less than significant at all receptor locations including NSR-14N and NSR-14S, based on the L.A. CEQA Thresholds Guide, FTA, and Los Angeles Municipal Code. In addition to the primary operational noise levels evaluated in the Draft EIR, the noise generated inside cabins was also evaluated separately, as demonstrated on Table 3.13-25 on page 3.13-57 of the Draft EIR. The cabin noise would not result in a contribution to cumulative noise levels because NOI-PDF-A ensures that the cabins would be designed such that they would generate noise levels of at least 10 dBA below the current background levels. Table 3.13-26 summarizes operational noise impacts for the worst-case operational scenario which includes potential impacts from cabin noise as the gondolas travel between and within the stations, towers, and junction. Operational noise impacts would be less than significant.

Comment P705-3 I also learned the gondola cars would be used for advertising and electronic billboards. This is horrible and we should not allow that into our airspace. Don't we have airspace rights here? This is so useless because giant ads like billboards, people already don't care about that. Why would anyone care about the ads you put on the gondola cars? You would just rake in money and make eyesores for everybody that lives here.

Response P705-3 Refer to Topical Response K, Signage and Lighting, for a discussion of the proposed Project's proposed signage including on the gondola 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. As discussed in Topical Response C, Project Features, the proposed Project's cabins could feature artwork from local artists or other community programming.

Comment P705-4 In addition, College Station is already not the cleanest. You should invest in keeping your existing stations clean before you take on these projects that would just make them dirtier. And we all know how the Metro takes what? A decade? To clean up the actual bus seats. This gondola might be shiny and new to start, but it will just become disgusting germ vestibules over time. I don't trust you guys to keep anything sanitary honestly. And how are you going to prevent Covid in these cabins where the windows don't open? You're building superspreader boxes.

Please reevaluate yourselves.

Response P705-4 As discussed in Section 2.0, Project Description, of the Draft EIR, 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. Operating procedures would be developed to reflect appropriate cleaning and maintenance requirements. Additionally, as discussed in Section 2.0, Project Description, of the Draft EIR, cabins would feature a ventilation system.

Comment Letter P706 – Tany Ling

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to P706

Comment P706-1 I am a resident and homeowner in Chinatown and I live along the proposed route of the gondola. I am OPPOSED to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium) and here's why:

Response P706-1 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. 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 P706-2 1- This is not a real public transit project: The route is incredibly short (just over 1 mile), basically only serves the stadium, and it replicates a route that is already served by existing public transit (Dodger Stadium Express buses, metro Gold Line light rail, existing metro bus routes). The limited service that this route offers is not worth the cost of the project in financial terms or in terms of destruction to the community and public spaces.

Response P706-2 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. 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. 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. The proposed Project would be free to ride for anyone with a ticket to a Dodger 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. Refer to Section 2.1, 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. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 2.5, Proposed Project Alignment and Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. Refer to Topical Response N, Environmental Justice, for discussion of how the Draft EIR addresses environmental justice, how the proposed Project supports Metro's goal of prioritizing equity opportunities, is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, how the public outreach for the proposed Project was designed with environmental justice principles in mind, how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety, and how the proposed Project is designed to be ADA compliant.

Comment P706-3 2- There was no community input at the outset: This project was hatched privately without any outreach to the very people who will be impacted by it; only when it entered the EIR period was it unveiled to the public and essentially paraded as something that we should want/need, even though we never asked for it.

Response P706-3 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping

period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately following the Draft EIR public review period, with four held in-person in the proposed Project area at Los Angeles Union Station and Cathedral High School, and four held virtually via Zoom webinar. Project materials and information were provided to both at 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. Refer to Topical Response N, Environmental Justice, for further discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment.

Comment P706-4 3- Destruction of privacy to residents: These gondola cabins will fly so low to the ground and over private homes that all sense of safety and privacy will be eliminated for residents.

Response P706-4 As discussed on page 2-18, in Section 2.0, Project Description, of the Draft EIR, 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 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. 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 proposed Project would meet and anticipates exceeding the ANSI B77.1 requirements for clearances. Refer to Topical Response M, Comparable 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. The proposed Project would be located in a densely populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of

environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, Gondola Design and Operations, of the Final EIR, and 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. 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. 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 safety features of the proposed Project and how aerial transit systems such as the proposed Project represent one of the safest modes of transportation relative to other forms of transit.

Comment P706-5 4- Visual and auditory blight: Gondola cabins flying over the park, over the streets, over the homes and apartments, over the pedestrians, etc.; Hulking Broadway Junction towering over Broadway/Bishops Road, noise from the machinery at Broadway Junction and whatever noise is created by the gondolas themselves. The towers, new stations, Broadway Junction will all be large and permanent structures which will destroy what's left of the open space of Chinatown and the LASHP. All this for the sake of, not public transportation, but a billionaire's long-scheme to develop his parking lots at the expense of taxpayers?

Response P706-5 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the operational noise impacts from the proposed Project. Operational noise impacts would be less than significant. 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, which would be less than significant. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. 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. Refer to 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 for a discussion of how the proposed Project solely proposes an aerial gondola system. 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.

Comment P706-6 We, the residents and stakeholders directly impacted by this proposed project, have stated many times over that we DO NOT WANT the gondolas. You have been given proof that it will not help with air pollution or taking cars off the roads. Chinatown is not for sale. There are better and cheaper ways to address the actual transportation issues with Dodger Stadium - ways that do not destroy the LASHP or the surrounding residential neighborhoods:

1- Electrify the bus fleet for Dodger Stadium Express

2- Increase the number of Dodger Stadium Express buses

3- Have pick-up/drop-off points in other parts of town such as Los Feliz, Atwater, Silverlake for the Dodger Stadium Express

4- Get serious about having bus-only lanes on game days so that these buses get priority over automobile traffic.

5- Improve pedestrian access to the stadium so that it provides wide and safe passage

Response P706-6 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 Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. 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. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, and Section 4.0, Alternatives, of the Draft EIR for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express 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. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. As discussed in Topical Response H, a system of buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events 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 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. For example, the current Dodger Stadium Express service from South Bay serves a broad area of southern Los Angeles County at stations spread across eight miles, is free, and travels on a priority lane within the I-110 freeway median for most of its trip, but the South Bay Dodger Stadium Express 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. Refer to Section 5.0, Corrections and Additions, of this Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which 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 was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project. The proposed Project would not preclude any of the improvements noted by the commenter.

Comment P706-7 If this project gets approval over all of the public outcry, this will be the greatest social injustice since Chavez Ravine was destroyed in order to build the Stadium. Is this the legacy you want for Metro?

Stop this project, do not approve, do not pass Go.

Response P706-7 Refer to Response P706-3 for discussion of the proposed Project's public outreach and stakeholder engagement process, which led directly to changes to the proposed Project. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine.

Comment Letter P707 - King Cheung

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to P707

Comment P707-1 (1). Chinatown does not need a gondola. Chinatown needs a hospital and supermarket

Response P707-1 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. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Additionally, refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety.

Comment P707-2 (2). The gondola will not improve traffic. Most people will drive to Chinatown to ride the gondola. Do not turn Chinatown into Dodger Stadium's parking lot.

Response P707-2 The proposed Project's ability to reduce vehicular travel is discussed in Section 3.17, Transportation, and Appendix N, Transportation Appendices, of the Draft EIR. 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. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. 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 the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take

transit, walk, or bike to the proposed Project's stations. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the 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.

Comment P707-3 (3). The gondola stations will be noisy all day until late at night. This is unhealthy.

Response P707-3 Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the operational noise impacts from the proposed Project, which would be less than significant. Refer to Responses GO17-129 and GO17-130 for discussion of the proposed Project's less than significant impact on human health associated with hearing loss, hearing damage, and sleep disturbance.

Comment P707-4 (4). Taxpayer dollars should not be used for any part of this project.

Response P707-4 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. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P707-5 (5). The gondola towers and stations are too big and not attractive. They do not look like Chinatown. They do not look Asian.

Response P707-5 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's towers and stations, which would be less than significant. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area.

Comment P707-6 (6). The tower leaning towards Metro Lofts looks like it will fall on the building. This is bad Feng Shui. This is a culturally insensitive project.

Response P707-6 Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the location and design of the Alameda Tower, Alpine Tower, and Stadium Tower. Refer to

Appendix F, Memo on Structural Engineering, of the Final EIR, for discussion of the structural design of the proposed Project's towers. As discussed therein, the towers 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, including all impacts from the height and tilt of the structures, to ensure structural integrity and safety." Refer to Response P707-5 for discussion of the aesthetic impacts of the proposed Project's towers, which would be less than significant.

Comment P707-7 (7). There will be no more available street parking. The gondola will make it harder for small mom-and-pop businesses to survive. Where will their customers park?
(8). The Gondola does not help the small businesses in Chinatown.

Response P707-7 Refer to Response P707-2 for discussion of how while parking is not required to be analyzed under CEQA or the TAG, the 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. Refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses in Chinatown.

Comment P707-8 (9). The gondola will distract drivers and make our streets more dangerous.

Response P707-8 Refer to Section 2.0, Project Description, of the Draft EIR for discussion of American National Standards Institute (ANSI) Standard B77.1 Industry standards for the design and operation of ropeways and cabins are documented in ANSI B77.1, which regulates vertical and horizontal clearances between the ropeway and cabins to elements such as vehicles and pedestrians. ANSI B77.1 requires the following vertical clearances between the cabins and on-ground features: 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 would meet and anticipates exceeding the ANSI B77.1 – 2017 and ANSI B77.1 – 2022 requirements for clearances. Given these required clearances and the height at which the cabins would travel over roadways, drivers would see cabins in the middle ground similar to where they might see a pedestrian overcrossing. Accordingly, cabins would create no more of a distraction to drivers than pedestrian overcrossings. Refer to Section 3.17, Transportation, of the Draft EIR, for discussion of how proposed Project components would have less than significant to no impacts on visibility of cars, pedestrians, and bicyclists. 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 P707-9 (10). This gondola project will damage our big park (LASHP).

Stop the Gondola!

Response P707-9 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. Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park 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, 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 Los Angeles State Historic Park.

Comment Letter P708 - Land Protection Partners

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to P708**Comment P708-1** Dear Mr. Zelmer:

The Los Angeles County Metropolitan Transportation Authority (“Metro”) has accepted an unsolicited project to build a private conveyance between Union Station and Dodger Stadium known as the Los Angeles Aerial Rapid Transit Project (the “Project”), has assumed Lead Agency status under dubious authority in that it is not the agency that has the principal responsibility for approving or carrying out the project, and has issued a Draft Environmental Impact Report (“DEIR”).

The conclusions in an EIR must be based on substantial evidence, which is discussed in the California Environmental Quality Act as follows (Pub. Res. Code § 21080, subd. (c)):

Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous, or evidence of social or economic impacts which do not contribute to or are not caused by, physical impacts on the environment, is not substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.

In the comments that follow we focus on the impacts to biological resources and identify that most of the conclusions and assertions in the DEIR are not supported by substantial evidence, and in fact substantial evidence supports the opposite conclusion from those assertions. As experts in environmental impact analysis of biological resources with decades of experience (see biographies below), we provide these comments as facts, reasonable assumptions predicated on facts, and expert opinion supported by facts.

Response P708-1 This comment provides a general introduction to the comments raised in this letter. Responses to the comments in this letter are provided in Responses P708-2 through P708-19. This comment provides a general recitation and characterization of the CEQA statute. Refer to 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, for discussion of how Metro is the proper lead agency for the proposed Project because Metro has primary responsibility for implementation of the proposed Project as the region’s transportation authority. 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 expert analysis supported by facts and relevant information and reasonable inferences from this information to support the EIR’s conclusion that the proposed Project would result in less than significant

impacts to biological resources with mitigation. As discussed in Section 8.0, List of Preparers, of the Draft EIR, and Section 9.0, List of Preparers, of the Final EIR, Section 3.04 and the respective reports were prepared by experts in the field.

Comment P708-2 1 Inadequate Biological Surveys

Biological surveys for the Project are described in Appendix E of the DEIR. The consultants purport to have surveyed the entire alignment on a single day (April 1, 2020), including a 500-foot survey buffer around the route. The methods do not describe how the biologist surveyed the entire three-dimensional project area, which extends up to 200 feet upward from the alignment. This third dimension is often ignored by biologists and its study requires appreciation of the speed at which animals move when aloft (Kunz et al. 2008). A 500-foot survey buffer is inadequate for assessing species that are moving through the air at a rate of 30 miles per hour (the speed of a typical songbird), thereby traversing the entire study area in less than 23 seconds. Furthermore, a single daytime survey in April cannot describe the volume and diversity of migratory birds that traverse the project location at night (most bird species migrate at night) during spring and fall migrations. In short, the survey effort on which the project biological assessment was made is inadequate to be considered substantial evidence regarding any impacts to wildlife and especially to birds that traverse the three-dimensional volume that would be impacted by the proposed project.

Response P708-2 Refer to Section 3.04 Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR. As stated on page 3.4-13, the 500-foot buffer was determined to be suitable for biological surveys as it is anticipated that indirect impacts beyond 500 feet in the existing environment would be diffuse and insignificant. As stated on page 3.4-14, a field survey was conducted on April 1, 2020, with a follow-up survey focused on tree species occurring on April 24, 2021. As discussed in Section 3.04, Biological Resources, of the Draft EIR, during the April 1, 2020, field survey, tall structures such as mature trees, power poles and towers, billboards, and buildings were scrutinized for the presence of nests and scans for wildlife activity, and potential bird nest sites were conducted using binoculars.

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 further discussion of the survey efforts in the BSA and the appropriate size of the BSA. As discussed in Appendix G, although the Draft EIR lists the wildlife species detected during the surveys, and states that these are common species, it does not conclude that the observed species are the only ones assumed to use the BSA, nor that sensitive species never occur in the BSA. Although additional surveys could increase the number of species detected, even exhaustive surveys may not result in detections of sensitive species that occur on site only occasionally. Nonetheless, 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), including the bird species flying in the airspace above the BSA, and observed 17 bird species and 2 mammal species. 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. Further, as discussed on page 3 of Appendix G, Supplemental Biological Resources Report, of this Final EIR, the use of radar studies and nocturnal surveys is unwarranted due to the lack of concentrated migration in the vicinity of the proposed Project alignment and because the height of the proposed Project is lower than the flight heights of nocturnal migrants. Refer to Section 3.1.2, Nocturnal Avian and Bat Collision Risk, of Appendix G, for further discussion of how the proposed Project would not pose a collision risk to birds flying at night, including nocturnal migrants.

Comment P708-3 Published guidelines to reduce impacts of power lines identify many techniques to evaluate the bird use of areas in route planning (APLIC 2006). These include: daytime and nighttime visual observation using tools to measure distance and altitude of birds (clinometers and theodolites), closed circuit television recordings, night vision tools such as image intensifiers, forward-looking infrared devices, and radar. Radar techniques are well established and were developed in 1978 to detect birds specifically to evaluate the risk of new transmission lines (Korschgen et al. 1984). These tools can be used to develop a reasonable assessment of the quantity and general species composition of birds that might be at risk of collision. Examples of such efforts are available in the published literature. Williams et al. (2001) used radar, visual observations, and a ceilometer to describe birds migrating through a mountain pass. Mabee and colleagues have described bird numbers and altitude of flight using radar at proposed wind power sites (Mabee and Cooper 2004, Mabee et al. 2006). Others have used nocturnal flight calls to identify passing migrants (Farnsworth et al. 2004, Farnsworth and Russell 2007). Nocturnal flight calls have been used by community scientists in Los Feliz to document nocturnal migrants passing over the downtown Los Angeles area (see <https://www.youtube.com/watch?v=B1RyBDnCcgg&t=1s>).

Response P708-3 Refer to Section 3.04 Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR for an analysis of the proposed Project's potential impacts to biological resources. As stated on page 3.4-14, a field survey was conducted on April 1, 2020, with a follow up survey focused on tree species occurring on April 24, 2021. During the April 1, 2020, field survey, tall structures such as mature trees, power poles and towers, billboards, and buildings were scrutinized for the presence of nests and scans for wildlife activity and potential bird nest sites were conducted using binoculars.

As discussed in Section 3.04 and Appendix E of the Draft EIR, and Appendix G, Supplemental Biological Resources Report, of the Final EIR, for discussion of

additional survey efforts and how the risk of avian collisions with the cables or components of the proposed Project would be less than significant. Design features of the proposed Project are likely to present a lower 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. 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. 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. This comment also suggests that specialized survey techniques, including radar studies and nocturnal surveys be included to evaluate the species of nocturnal bird migrants passing over the BSA, as well as their flight heights. As discussed in Appendix G, these types of specialized surveys would be warranted if evidence indicated 1) migration were expected to be concentrated in the vicinity of the proposed Project alignment; and 2) potentially significant impacts were anticipated. However, neither of these is expected in this case and accordingly, the use of more specialized survey techniques is unwarranted.

Comment P708-4 2 Collision Risk

The DEIR acknowledges that installing large cables up to 195 feet in the air could pose a collision risk. The preparers' subsequent analysis of that risk, however, is replete with unsupported assertions and mischaracterizations of the literature.

The analysis of collision risk in the DEIR consists of the following statements in the main text and Biological Resources report (Appendix E):

- Ropeway cables would pose less danger than transmission lines because they are 1.75 to 2.5 inches in diameter compared with 1–2 inches for transmission lines and 0.5 inches for ground wires above transmission lines.

- The three ropeway cables would be spaced tightly in the vertical plane and so would pose less risk than if they were spread more broadly.
- The tight spacing of cables vertically would make them more visible.
- Cables would be made more visible by the moving cabins.
- Therefore avian collision risk from the cables would be less than for transmission lines.
- Concentrated avian activity is not expected near the project. Migratory movement is focused on prominent ridgelines, shorelines, and where favorable stopover habitat is located. The project 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.”
- Grouse and ptarmigan have poor maneuverability in flight and collide with ski lift cables but no similar species are found in the project area.

Response P708-4 This comment provides a general recitation and characterization of the Draft EIR. Refer to Response P708-3 for a discussion of the proposed Project’s design features that are likely to reduce the risk of avian 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. As discussed in Appendix G, 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. 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 P708-5 We consider these claims in turn.

Cable size. The DEIR relies on the idea that birds will be able to see the ropeway cables during the day because they can be half an inch larger than transmission wires. This is a preposterous claim. Notwithstanding citations in the DEIR, current published

sources indicate that there is no evidence to back this claim, which derives from experiments on transmission lines comparing the main power lines, which are always lower and larger, with the ground wires, which are always smaller and located higher than the main lines (Bernardino et al. 2018). Studies that remove the upper, smaller wires document a decrease in avian mortality but there is “no possibility of disentangling the effects of wire height and diameter” (Bernardino et al. 2018). There is some experimental evidence suggesting that it is the placement of the ground wire that is the important factor and that making it larger does not decrease collisions (Brown et al. 1987). The DEIR therefore errs in relying on the assumption that a tiny difference in cable diameter will mitigate daytime collisions. It also will not mitigate collisions at night, which is when most migratory birds will encounter the structure and cables. Nocturnal migrants do not see cables, even the guy lines that hold up 2,000-ft communication towers that are much larger than the proposed cables (Longcore et al. 2008), because they encounter them in the dark. There may be “general agreement” in the literature that larger cables are safer, but the most recent scientific review “found little scientific evidence that these recommendations [including to use larger diameter cables] are effective” (Bernardino et al. 2018).

Response P708-5 As discussed in Appendix G, Supplemental Biological Resources Report, of the Final EIR, the proposed Project’s ropeway cables would be 1.75 to 2.5 inches in diameter, reducing the risk of collisions compared to transmission lines because they will be more visible to birds. Birds are capable of detecting objects from much further away than humans and can react to objects appearing in their visual field much more rapidly than humans, as must diurnal birds have a much higher concentration of rods and cones in their eyes than humans and their retinal structure allows for resolution of movement above 100 hertz. Furthermore, given the paucity of studies on gondola systems impacts to wildlife, using data on wildlife collisions with transmissions lines is a logical approach for comparison due to greater data availability. However, in the absence of studies that directly compare avian collision rates with transmission lines to their collision rates with ropeway cables associated with gondola systems, it would not be appropriate to assume gondola cables present the same diurnal collision risk. Refer to Response P708-3 for a discussion of the proposed Project’s design features that are likely to reduce the risk of avian collisions. Refer to Section 3.1.2, Nocturnal Avian and Bat Collision Risk, of Appendix G, for further discussion of how the proposed Project would not pose a collision risk to birds flying at night, including nocturnal migrants. The proposed Project towers and cables are below the heights where most nocturnal avian collision impacts occur. The proposed Project’s components are 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.

Comment P708-6 Vertical spacing of cables. The DEIR argues that because the three cables would be packed tightly in the vertical plane, they would pose less of a risk than if they were

spaced out vertically. First of all, this claim has no evidence to support it in the published literature. Second, it imagines that all birds move in a single vertical plane through the atmosphere, as if they were aircraft on a flight path at a cruising altitude. That is not how birds move in space. Because birds increase and decrease in altitude as they use the airspace, the packing of the wires vertically is not the substantial mitigation measure that is assumed in the DEIR.

Response P708-6 Refer to Response P708-3 for a discussion of the proposed Project's design features that are likely to reduce the risk of avian collisions. As discussed in Appendix G, Supplemental Biological Resources Report, of this Final EIR, there are limited empirical data available on avian collision with gondola cables, particularly in urban environments. A review of the literature since the publication of the Draft EIR provided no new information on this topic. However, as discussed in Appendix B to Appendix G, Memorandum from Doppelmayr Regarding Comparable System Bird Strikes, Doppelmayr USA, one of two manufacturers of 3S gondola systems in the world, noted that a similar 3S gondola project measuring about 0.5 mile long and spanning the Rhine River in an urban environment in Koblenz, Germany was recently approved for an extension of their operating permit after the first 3 years of operation, noting that no bird strikes were detected during that period.

Comment P708-7 Increased visibility of three cables. The DEIR argues that because there are three cables in close proximity, birds will see them more. Again, power lines often have several lines together and still result in avian collisions and mortality. There is no evidence to support this self-serving claim, and it similarly does not address nocturnal collision risk.

Response P708-7 Refer to Response P708-3 for a discussion of the proposed Project's design features that are likely to reduce the risk of avian collisions. As discussed in Appendix G, Supplemental Biological Resources Report, of this Final EIR, most birds have far higher levels of visual acuity than humans, and can resolve movement much faster than humans. Most diurnal birds have a much higher concentration of rods and cones in their eyes than humans, and their retinal structure allows for resolution of movement above 100 hertz, compared to 60 hertz for humans. Birds are therefore capable of detecting objects from much farther away than humans and can react to objects appearing in their visual field much more rapidly than humans. In addition, most nocturnal avian flight occurs during migration, when birds usually fly thousands of feet above ground level, whereas the proposed Project component heights are all below 200 feet at ground level.

Comment P708-8 Risk relative to transmission lines. The DEIR presents its unsupported assertion that the cables would cause less mortality than a similarly situated power line as if it were evidence that impacts would be less than significant. This is incorrect on two fronts. First, the DEIR provides no substantial evidence that the rate of avian collision and mortality would be less than power lines. The height of the cables and of power lines are similar. There is no support to claim that moving cars attached to the cables would

increase visibility (Bech et al. 2012) and especially moving cars would not be a factor in the middle of the night when the wires would be encountered by nocturnal migrants. Second, the question that must be answered for environmental analysis is not one of relative impacts, but whether the impact itself would be significant. Based on collision rates with power lines, any analysis of the impacts from the proposed project should start from the assumption that the 1.9 km length of the cables will kill up to 152 birds per year, and given the variability in collision rates, an average value would be 75 birds per year (Jenkins et al. 2010). This would be true of any aerial cable system at the heights proposed in the project area. The birds that could collide with it might include sensitive species (given their presence in the surrounding park and along the Los Angeles River) and therefore this should be considered to be a significant impact, both through direct adverse effects on sensitive species and interference with migratory wildlife corridors. The DEIR, in contrast, asserts there will be no adverse effects because it asserts that there will be no concentration of avian movement intersecting with the site, which we consider next.

Response P708-8 Refer to Response P708-3 for a discussion of the proposed Project's design features that are likely to reduce the risk of avian collisions. Refer to Response P708-11 for a discussion of bird collisions at a comparable aerial gondola system. Refer to Response P708-9 for a discussion of avian movement in the proposed Project area. Refer to Response P708-5 for a discussion of how the proposed Project would not pose a collision risk to nocturnal migrants.

Comment P708-9 Concentrated avian movement. The DEIR makes the claim that the project site is in the middle of a broad coastal plain, lacking topography to concentrate migrants and lacking habitat that would attract birds as stopover locations. These assertions are flawed.

Significance of impacts depends not necessarily on the quantity of birds but on whether sensitive species are affected. Many sensitive bird species migrate through Los Angeles and could encounter the project site.

The assertion that there is no stopover habitat to attract birds ignores the presence of the Los Angeles River and Silver Lake Reservoir Complex, which is a significant stopover habitat for waterfowl, in close proximity to the site. An assessment of this question must look at a broader landscape context than the 500-ft buffer considered in the DEIR because, as noted, birds fly quickly through the air and major stopover locations are found within a few minutes flight from the project site.

Response P708-9 As discussed on page 3.4.13 in Section 3.04, Biological Resources, of the Draft EIR, avian migratory movements tend to be focused along prominent ridgelines, shorelines, and where there is favorable stopover habitat. The proposed Project alignment is 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. As a result, the BSA does not serve as a

regional wildlife corridor, and direct impacts to regional wildlife movement would not occur. Moreover, refer to Appendix G, Supplemental Biological Resources Report, of this Final EIR, for discussion of how 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 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 above ground level) 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. The 500-foot buffer was determined to be suitable for biological surveys as it is anticipated that indirect project impacts beyond 500-feet in an urban environment would be diffused and would not significantly impact biological resources. 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. For instance, both the CDFW (2022) and U.S. Fish and Wildlife Service ([USFWS] 2014) recommend 500-foot disturbance buffers for least Bell's vireos, with protocol surveys in suitable habitat within 500 feet of proposed construction areas. This is, in part, why the 500-foot distance was selected for the BSA.

Comment P708-10 There is another factor that concentrates avian migrants that is entirely ignored by the DEIR: artificial light at night. Nocturnally migrating birds can be tracked on weather radar and research has now shown that light at night escaping upwards is associated with greater numbers of birds present during the day, especially in the fall when juveniles are migrating south (La Sorte et al. 2017). As birds are migrating southward they are attracted to lights and then end up disproportionately using habitats in and around cities as compared with potentially better habitats elsewhere (McLaren et al. 2018). Lights can rapidly increase the density of migratory birds in an area at night. A study of the "Tribute in Light" installation in New York documented an increase from 500 birds within 0.5 km of the vertical light beams before they were turned on to 15,700 birds within 0.5 km 15 minutes after illumination (Van Doren et al. 2017). Downtown Los Angeles also attracts and concentrates birds, especially in the springtime, based on radar measurements (Horton et al. 2019). Dodger Stadium itself creates one of these exceptionally bright points on the landscape and would itself attract and disorient birds, as was seen recently with a Greater White-Fronted Goose at a Dodgers playoff game. Therefore, contrary to the assertions in the DEIR, this location is associated with concentrations of avian migrants.

Response P708-10 Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR for discussion of potential project impacts to migratory birds during both construction and operation of the proposed Project. As stated on page 3.4-19 in Section 3.04 proposed Project lighting would be low-level and primarily integrated into the architectural features. Additionally, exterior lighting would be shielded and/or directed toward the areas to be lit, limiting spillover into adjacent habitats potentially suitable for birds and bats. Due to the high level of exterior lighting currently present in the urbanized BSA, lighting proposed by the proposed Project is not anticipated to have an indirect impact on bird and bat species. Refer to Appendix G, Supplemental Biological Resources Report, of this Final EIR, for discussion of how light in the vicinity of the proposed Project is not anticipated to attract nocturnal migrant birds any more than existing light pollution over the Los Angeles Basin. Furthermore, lighting from Dodger Stadium field lights is not expected to attract nocturnal migrant birds. The lights from Dodger Stadium are angled downward, not upward into the darkness as in the *Tribute in Light* display in New York City (referenced in this comment), and are not nearly as bright or concentrated as that display. If lighting at stadiums were a major attractant to birds during migration, there should be many more examples of this phenomenon, given the large number of professional sports (e.g., baseball, football, soccer), and concert events that occur at such venues at night during spring and fall migratory periods. The occurrence of the greater white-fronted goose that landed at Dodger Stadium in October 2022 is not an indication of a widespread phenomenon.

Comment P708-11 Species susceptible to collision found in project area. The DEIR references a study of grouse and ptarmigan collision with ski lifts (Bech et al. 2012) to conclude that no similar low maneuverability species vulnerable to collision are found in the project area. The DEIR ignores the big message from that paper, which is that searches for carcasses only reveal a small fraction of the birds killed at elevated wires. In that instance, a bird had collided with the wires and was found 600 m (1,969 ft) away, far outside the zone typically searched for mortality at wires. The steep topography of the site may have contributed to this distance, but the genetic linking of an individual bird to feathers underneath an obstruction 600 m away suggests that any current estimates of avian mortality at elevated obstructions are low (Bech et al. 2012).

Response P708-11 Refer to Response P708-3 for a discussion of the proposed Project's design features that are likely to reduce the risk of avian collisions. As discussed in Appendix G, Supplemental Biological Resources Report, of this Final EIR, there are limited empirical data available on avian collision with gondola cables, particularly in urban environments. A review of the literature since the publication of the Draft EIR provided no new information on this topic. As discussed in Appendix B to Appendix G, Memorandum from Doppelmayr Regarding Comparable System Bird Strikes, Doppelmayr USA, one of two manufacturers of 3S gondola systems in the world, noted that a similar 3S gondola project measuring about 0.5 mile long and spanning the Rhine River in an urban environment in Koblenz, Germany was recently approved

for an extension of their operating permit after the first 3 years of operation, noting that no bird strikes were detected during that period. Further, as discussed in Appendix G, avian mortality rates cited in studies associated with transmission lines include mortalities arising from factors other than collision-related trauma, suggesting that avian mortality rate studies may disproportionately attribute avian mortality to collision, rather than other causes of death (which would not occur in association with the proposed Project).

Comment P708-12 The DEIR does not provide important information about what groups of species are more vulnerable to collision (Bevanger 1994, Savereno et al. 1996, Bevanger 1998, Janss 2000). Although all bird species are potentially exposed, the species that are typically at greatest risk are large, heavy, relatively small-winged birds with poor vision (Jenkins et al. 2010). The most susceptible groups tend to be waterbirds and in particular large ducks, geese and swans, pelicans, large herons and waders (Jenkins et al. 2010). Rails, coots, and cranes (Gruiformes) are most frequently recorded birds killed at power lines (Bevanger 1998). Other groups at risk include waterbirds and diving birds such as ducks (Anseriformes) and loons (Gaviformes), which also have high “wing loading,” which means that their wings are small relative to their weight (Bevanger 1998). Records of mortality of species in these groups are common also because they are larger, more easily detected, less likely to be carried off by scavenger, and therefore more likely to be recorded. Other species that are theoretically prone to collisions based on their size, wing loading ratio, and vision are found less in surveys, probably because they are smaller and harder to detect (Drewitt and Langston 2008), or travel significant distances after being injured (Bech et al. 2012). These more sensitive groups would include pigeons (including native Columbiformes such as Band-tailed Pigeon and Mourning Dove), some passerines, and highspeed predators such as falcons (Jenkins et al. 2010). Aerial predators, such as swifts, many raptors, and even gulls, are at risk because they spend so much time in flight that have an increased probability of colliding with wires than other species that fly less (Bevanger 1998, Janss 2000).

Response P708-12 Refer to Response P708-3 for a discussion of the proposed Project’s design features that are likely to reduce the risk of avian collisions. Refer to Appendix G, Supplemental Biological Resources Report, of this Final EIR, for a discussion of how the proposed Project stations, junction, towers, and cables, are below 200 feet above ground level, whereas most avian flight during migration occurs at thousands of feet above ground level. According to experts in the field of avian collision risk, structures below 200 feet agl contribute negligibly to overall annual bird mortality, even in weather conditions with reduced cloud ceiling. Further, the proposed Project components are located within an urban environment with many other obstacles of similar heights. Therefore, the proposed Project components are not anticipated to contribute significantly to overall annual bird mortality. As discussed in Appendix G of this Final EIR, the collision risk to common bird species arising the proposed Project components is expected to be low. As discussed in Appendix G, the risk of collision for sensitive bird species

would be exceedingly low given the overall low probability of birds colliding with components of the proposed Project in general, and the fact that these species are relatively rare and would comprise a low percentage of bird species present in the vicinity of the proposed Project.

Comment P708-13 In conclusion, the collisions analysis in the DEIR misrepresents the published literature and is not based on substantial evidence. The proposed aerial tramway will kill birds through collisions and the proximity of waterbirds attracted to nearby habitats at the Los Angeles River and Silver Lake Reservoir Complex, combined with the excessive light escaping from downtown Los Angeles (Pack et al. 2017), increases the probability of such collisions and the resulting annual fatality rate. From a CEQA perspective, this represents interference with a migratory pathway and adverse impacts on sensitive species, which are included in the migratory species that traverse Los Angeles routinely. It deserves mention that avian collisions with power lines (or by extension, the proposed aerial tram system) cannot be eliminated through mitigations (Alonso et al. 1994, Brown and Drewien 1995, Janss and Ferrer 1998).

Response P708-13 This comment provides a conclusion regarding the comments raised in this letter. Responses addressing the summarized conclusions raised in this comment are provided in Responses P708-4 through P708-12, and P708-14. As identified in Section 3.04, Biological Resources, of the Draft EIR, the proposed Project would result in less than significant impacts to bird species due to collisions, and therefore no mitigation is required.

Comment P708-14 3 Lighting

The DEIR does not fully describe all sources of lighting. It makes a vague mention of digital billboards (p. ES-11) as follows:

[E]lectronic 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. Signage would be architecturally integrated into the design of the ART system including its stations, the junction, towers, and cabins.

The prospect of LED billboards festooning the towers, gondolas, and stations is not adequately accounted for in the environmental analysis of biological resources and in fact is not considered at all. The aesthetics analysis contains no renderings of the project at night, so decisionmakers are lacking critical information to understand the full impacts of the lighting from the project both for impacts on visual resources and for the impacts of light pollution on biological resources.

Response P708-14 Refer to Topical Response K, Signage and Lighting, for discussion of the proposed Project's signage and lighting, with additional technical detail and information provided in the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR. The proposed Project's Sign Concept Plan included at

Appendix B of the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR, provides that across the entire proposed Project, including stations, the junction, towers, and cabins, the proposed Project is proposing static signage and 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. 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.

Refer to Appendix G, Supplemental Biological Resources Report, of this Final EIR, for discussion of how light in the vicinity of the proposed Project is not anticipated to attract nocturnal migrant birds any more than existing light pollution over the Los Angeles Basin. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental impact. (See, e.g., CEQA Guidelines § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (*Id.*, § 15204.)

Comment P708-15 The proposed "project design feature" for lighting (AES-PDF-A) violates national standards set by the Illuminating Engineering Society for off-roadway outdoor signage (RP-39-19). The project proposes 10,000 candela per square meter during the day, when the highest allowable brightness by national standards is 3,500 candela per square meter. At night, the project design feature proposes 300 candela per square meter, while the highest allowable brightness for the lighting zone appropriate for a business district (LZ3) is 80 candela per square meter. The portion of the project in the State Park and heading up into Chavez Ravine should probably be classified as LZ2, where the maximum allowable luminance is 40 candela per square meter. LZ3 is defined as, "Areas of human activity (i.e., habitation, recreation and/or work) where electric lighting may be continuous and is required for safety and convenience at night. This is the recommended default zone for large cities' business districts)," and LZ2 is defined as, "Areas of human activity (i.e., habitation, recreation and/or work) where electric lighting may be required for safety and convenience at night. This is the recommended default zone for light-commercial business districts and high-density or mixed-use residential districts" (Illuminating Engineering Society, RP-39-19, Recommended Practice: Off-Roadway Sign Luminance: An American National Standard).

Response P708-15 Refer to Topical Response K, Signage and Lighting, for a discussion of the proposed Project lighting. The Lighting Study, which is included in Appendix C, Visual Impact

Assessment, of the Draft EIR, analyzed the proposed Project's potential environmental impacts resulting from the proposed 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 CASP, the RIO, 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.

The commenter refers to the Illuminated Engineering Society Recommended Practice: Off-Roadway Sign Luminance (RP-30-19). As specified in that document at Section 1.2 Scope the "recommendations provide guidelines only for the lighting of signs that are located off the right of way of roadways—in other words, all signs not regulated by a federal, state, provincial, or local jurisdiction . . ." The proposed Project's signs and lighting are subject to City of Los Angeles and State of California regulations and therefore the recommendations provided in the Illuminated Engineering Society Recommended Practice: Off-Roadway Sign Luminance (RP-30-19) do not apply to the proposed Project. In addition, the Illuminated Engineering Society document clearly indicates that these are only recommendations and the City of Los Angeles and State of California lighting and signage regulations control.

Regarding the application of California Energy Code (CEC) Lighting Zone LZ3 to the Project Site, as discussed on page 12 of the Lighting Study, "[a]ll urban area within California are designated Lighting Zone 3 as default under the CEC, which limits the light trespass illuminance to 8 lux (0.74 footcandles). . . The Project sites are all within the City of Los Angeles which is designated by the CEC as Lighting Zone 3. . . Consistent with this, LAMC Chapter 9, Article 9, Division 5, Sec 99.05.106.8 applies Lighting Zone 3 to the City of Los Angeles by including the following reference to the CEC requirements: 'Comply with lighting power requirements in the California Energy Code, California Code of Regulations, Title 24, Part 6. Meet or exceed exterior light levels and uniformity ratios for lighting zone 3 as defined in Chapter 10 of the California Administrative Code, Title 24, Part 1.'" Therefore, since the proposed Project is located entirely within the City of Los Angeles, the proposed Project alignment is appropriately categorized as Zone 3.

Refer to Appendix G, Supplemental Biological Resources Report, of this Final EIR, for discussion of how light in the vicinity of the proposed Project is not anticipated to attract nocturnal migrant birds any more than existing light pollution over the Los Angeles Basin.

Comment P708-16 The lighting "project design feature" also defines brightness in terms of Watts, which is not useful. Lights have different efficiencies and the restriction that, "Building Lighting will not exceed 60 watts" is not useful unless the lamp type is specified. It

should indicate the total lumens that can be produced per fixture rather than specifying energy consumption. The related limitation on light output for outdoor luminaires of 6,200 lumens is set unreasonably high. That is the equivalent of having ten 60-Watt incandescent bulbs in a single fixture. A “design feature” with this limitation will do nothing to mitigate the impacts of the proposed lighting infrastructure on visual resources or people who are exposed to the lights from their residences.

Response P708-16 Refer to Topical Response K, Signage and Lighting, for a discussion of Project lighting. The Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR, 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. As discussed on page 55 of the Lighting Study (and within the Lighting Study Appendix A, Building Lighting Concept Plan) 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 Concept Plan, the illuminance design standards for the 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. The Lighting Study analyzed the proposed Project for compliance with the Los Angeles Municipal Code, CALGreen, the Cornfield Arroyo Specific Plan (CASP), the Los Angeles River Improvement Overlay District (RIO), 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.

As discussed in Section 3.01, Aesthetics, of the Draft EIR, the proposed Project would result in a less than significant impact to aesthetics including light trespass and glare. Nevertheless, the proposed Project would incorporate project design features related to lighting in order to provide additional environmental benefits and to memorialize the proposed Project’s commitment to certain regulatory requirements. Specifically, AES-PDF-A provides some additional detail regarding certain maximum light levels associated with the proposed Project’s lighting design with respect to wattage, lumens, and candelas. Final specifics regarding wattage, lumens, and candelas may actually be less than the maximums provided in AES-PDF-A. With respect to the provision in AES-PDF-A providing that “Building Lighting will not exceed 60 watts,” this provision was incorporated into the proposed Project to reflect requirements of the CASP. As discussed at pages 9-10 of the Lighting Study, the CASP specifically exempts from its requirements internally illuminated signs, architectural lighting that does not exceed an intensity of 60 watts, and pedestrian lighting that does not have an intensity greater than 60 watts. Accordingly, the 60-watt design element was memorialized in AES-PDF-A to demonstrate the Project’s compliance with the CASP.

Regarding the provision in AES-PDF-A providing that “Building Lighting outdoor luminaires will not exceed 6200 initial lumens,” this provision was incorporated into the proposed Project to reflect requirements of the California Energy Code (CEC). As discussed at pages 11 – 12 of the Lighting Study, “[t]he 2019 California Energy Code includes the following requirements for Glare:

Section 130.2 OUTDOOR LIGHTING CONTROLS AND EQUIPMENT

“(b) Luminaire cutoff requirements. All outdoor luminaire of 6,200 initial luminaire lumens or greater, shall comply with backlight, uplight, and glare (collectively referred to as “BUG” in accordance with IES TM-15-11, Addendum A) requirements as follows:

1. Maximum zonal lumens for backlight, uplight, and glare shall be in accordance with Title 24, Part 11, Section

5.106.8.

Exception 1 to Section 130.2(b): Signs

Exception 6 to Section 130.2(b): Luminaires that illuminate the public right of way on publicly maintained roadway, sidewalks and bikeways.”

With the incorporation of AES-PDF-A, the proposed Project’s lighting is exempt from the requirements of Section 130.2 because all outdoor luminaires will not exceed 6200 initial lumens. Nevertheless, as explained at pages 11 – 12 of the Lighting Study, the proposed Project’s lighting fixtures would also comply with BUG ratings in accordance with IES TM-15-11, Addendum A to limit offsite glare.

Refer to Section 7.0, Mitigation Monitoring and Reporting Program, for the proposed Project’s Mitigation Monitoring and Reporting Program, which incorporates the proposed Project’s Project Design Features, including AES-PDF-A, as mandatory elements of the proposed Project. Accordingly, Metro has committed to implementing AES-PDF-A.

Comment P708-17 The Visual Impact Analysis in the DEIR does not evaluate whether any of the proposed lighting from the project would violate Los Angeles Municipal Code Section 93.0117, which reads:

No person shall construct, establish, create, or maintain any stationary exterior light source that may cause the following locations to be either illuminated by more than two footcandles (21.5 lx) of lighting intensity or receive direct glare from the light source:

1. Any exterior glazed window or sliding glass door on any other property containing a residential unit or units.
2. Any elevated habitable porch, deck or balcony on any other property containing a residential unit or units.

3. Any ground surface intended for uses such as recreation, barbecue, or lawn areas on any other property containing a residential unit or units.

EXCEPTIONS: This subsection shall not apply to:

1. Any frosted light source emitting 800 lumens or less.
2. Any other light source emitting more than 800 lumens where the light source is not visible to persons on other residential property.

Given that much of the infrastructure proposed will be several stories in the air, it is highly likely that even if lights are shielded from being directed upward, they will result in direct glare on residences in violation of Municipal Code. The calculations provided in the technical appendix are focused on illuminance measurements, when the code allows no direct glare, regardless of the illuminance. None of the Lighting Design Report calculations show compliance with this code section.

Response P708-17 Page 8-9 of the Lighting Study summarizes the Los Angeles Municipal Code (LAMC) lighting regulations including Los Angeles Municipal Code Section 93.0117. Further, as explained on p. 13 of the Lighting Technical Study, consistent with LAMC 93.0117, the lighting analysis specifically evaluates whether the Project's lighting would result in illuminance "greater than 2.0 foot-candles at a residential property boundary." Accordingly, the lighting analysis does specifically include an evaluation of whether lighting from the proposed Project is in compliance with LAMC Section 93.0117, and the Lighting Technical Study concludes the proposed Project's lighting "will be less than the maximum light trespass illuminance of 2.0 fc at all adjacent residential use properties as stipulated by LAMC." In addition, as noted on page 9 of the Lighting Study, "[s]ome of the Project's lighting is subject to exceptions provided in LAMC Section 93.0117, such as light sources less than 800 lumens, light sources for emergency egress lighting, light sources for traffic and street illumination, and aircraft warning lights. Specifically, the Project's Building lighting is primarily related to the safe operations of the transportation facility. Nevertheless, the requirements of LAMC Sec. 93.0117 are utilized in this Study to present a conservative analysis of any potential Project lighting impacts and the potential exceptions are not applied to the Project's analysis." The Lighting Study also conducted a glare analysis for the proposed Project at pages 49-52, which concluded that the proposed Project would not create high contrast or glare conditions at residential, sensitive sites, or roadway sites.

Comment P708-18 Finally, it is unclear the extent to which the stations will remain illuminated at night and overnight and to what extent the shells of the large canopies are transparent. From the renderings it appears that they are somewhat translucent, and therefore would result in escaping light at night, appearing as large glowing masses in the sky at night.

The lighting report also illustrates several examples of uplighting of structures and landscape elements, which is inconsistent with the text in the DEIR claiming that lights will be “shielded,” which normally implies that light would be directed downward (see pp. 3.1-8 and 3.1-9 of DEIR). Uplighting is always an adverse environmental impact and illuminating trees at night is harmful to their health (Briggs 2006, Bennie et al. 2016, Meng et al. 2022) and should be avoided.

Response P708-18 The proposed Project’s Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR, conducted an analysis of the proposed Project’s nighttime lighting. As noted on page 13 of the Lighting Study the analysis of lighting considered the “change in ambient nighttime levels as a result of project sources.” Therefore, the proposed Project’s Lighting Study was specifically designed to evaluate the proposed Project’s nighttime lighting impacts. Refer to Response P708-16, which specifically explains that the proposed Project will be designed in compliance with backlight, uplight, and glare requirements. Refer to Response P708-10 for discussion of how, as stated on page 3.4-19 in Section 3.04, Biological Resources, of the Draft EIR, proposed Project lighting would be low-level and primarily integrated into the architectural features. Additionally, exterior lighting would be shielded and/or directed toward the areas to be lit, limiting spillover into adjacent habitats potentially suitable for birds and bats.

Comment P708-19 4. Structure Design Likely to Result in Large Rock Pigeon Roosts

Project designers do not appear to realize that a large open canopy as depicted in the project renderings in the Lighting Design Report, combined with exposed structural beams and girders, is likely to result in large Rock Pigeon roosts. Pigeons can be vectors of disease and their droppings would foul the surfaces in the stations. The DEIR should consider this eventuality and disclose the chemical and/or physical methods that would be used to exclude pigeons from roosting from within these structures. The station design is setting up the operators to be under pressure to undertake ongoing, potentially inhumane, measures to control pigeon numbers.

Sincerely,

Travis Longcore, Ph. D.

Catherine Rich, J.D., M.A.

Response P708-19 Refer to Appendix G, Supplemental Biological Resources Report, of this Final EIR, for discussion of methods to prevent roosting or nesting opportunities for pigeons. There are numerous non-chemical and non-lethal anti-perching devices (e.g., Nixalite® bird spikes) that can be installed to prevent birds from becoming established. Chemical methods of pigeon removal or control would be avoided. It is also worth noting that the surrounding area contains numerous potential roosting and nesting opportunities (e.g., in the nearby buildings and billboard signs), and that the stations and junction themselves would not be drawing pigeons into the area and concentrating them above current levels. Refer to Section 5.0, Corrections and Additions, as in response to comments, the proposed Project has committed to implementing BIO-PDF-D and

avoid using any rodenticides and second-hand 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.

Comment P708-20 5 About the Authors

Dr. Travis Longcore and Catherine Rich are principals of Land Protection Partners. Dr. Longcore is Associate Adjunct Professor in the Institute of the Environment and Sustainability at UCLA. He has taught, among other courses, Bioresource Management, Environmental Impact Analysis, Field Ecology, and Ecological Factors in Design. He was graduated *summa cum laude* from the University of Delaware with an Honors B.A. in Geography, holds an M.A. and a Ph.D. in Geography from UCLA, and is professionally certified as a Senior Ecologist by the Ecological Society of America and as a GIS Professional by the Geographic Information System Certification Institute. He is a 24-year member of the Los Angeles County Environmental Review Board. Catherine Rich is Executive Officer of The Urban Wildlands Group. She holds an A.B. with honors from the University of California, Berkeley, a J.D. from the UCLA School of Law, and an M.A. in Geography from UCLA. She is lead editor of *Ecological Consequences of Artificial Night Lighting* (Island Press, 2006) with Dr. Longcore. Longcore and Rich have authored or co-authored over 60 scientific papers in top peer-reviewed journals such as *Auk*, *Biological Conservation*, *Conservation Biology*, *Environmental Management*, *Frontiers in Ecology and the Environment*, *Trends in Evolution and Ecology*, and *Urban Forestry and Urban Greening*. Longcore and Rich have provided scientific review of environmental compliance documents and analysis of complex environmental issues for local, regional, and national clients for 23 years.

Response P708-20 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 P708-21 6 Literature Cited

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Response P708-21 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. The cited documents were considered in connection with their respective comment.

Comment Letter P709 - Phyllis Ling

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to P709**Comment P709-1** Dear Mr. Zelmer and Metro,

I am writing this letter in OPPOSITION to the Los Angeles Aerial Rapid Transit Project ("The Gondola" to Dodger Stadium, or "The Gondola Project"). The following are a list of concerns that I would like to add to my previous comment letters:

Response P709-1 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. 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 P709-2 through P709-34.

Comment P709-2 Process/Transparency

By allowing this project to move forward to environmental review without a feasibility study, Metro has allowed Frank McCourt to bully our community. It's hard to describe the impact of this. The gondolas would fly directly over my neighborhood. The 98ft tall Broadway Junction would be noisy and imposing. One of my neighbors has said that she has had a lot of anxiety about this project, about the uncertainty of it coming into our neighborhood.

Response P709-2 Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. The Draft EIR itself serves as a "feasibility study" for the proposed Project, analyzing the proposed Project's potential environmental impacts. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language. 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. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the less than significant noise impacts from operations 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, which would be less than significant. Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of how comparable aerial transit systems in cities around the world operate safely, efficiently, and in concert with nearby

residential and open space uses. 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 P709-3 The following is a speech I gave at a “convening” to introduce a number of community organizations to the gondola project and our efforts to organize against it. I hope it provides a sense of the impact that this project has already had on our community:

I’m a resident on a street called Savoy that’s on the other side of Broadway from this park. My sister and I became homeowners here 10 years ago. We got lucky after two years of searching and bidding wars. Our mom has always encouraged us to own, to have that security and stability, and we love our house. It's over 125 years old, and we've spent many years working on it, and making it our home.

But even more important than the house itself, we've become a part of the community. Many of my neighbors have been here for decades. There are families raising their kids here, seniors who walk and take the bus, some who speak a little English, some none at all. It's a neighborhood where people grow and share fruit and vegetables. When the LA Times reporter was here, my 95-year-old neighbor would not let her leave without a bag of vegetables. Some of our neighbors gave us rice dumplings a couple of weeks ago when it was good luck to eat them. It's a neighborhood where people look out for each other.

Response P709-3 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 P709-4 Living here, there's Dodger traffic, high school traffic, even concerts in this park. But those things we sort of expect and can deal with. What we never expected was that a billionaire would want to build a massive gondola project over us, and be given a fast pass by Metro to do it.

Four years ago, in 2018 when the gondola was first announced, it was just a concept. No route was proposed. But the next time we heard about it was two years later, with the notice of preparation for the EIR. McCourt's company decided on their two routes, both over my neighborhood, and they made that decision without holding even one public meeting.

Response P709-4 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. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed

Project’s public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project’s scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. For example, after initially offering two options for the proposed Project alignment in the Notice of Preparation, responding to stakeholder input, the Project Sponsor announced it would proceed with the proposed Project alignment studied in the Draft EIR, including the intermediate Chinatown/State Park Station near the southernmost entrance to the Los Angeles State Historic Park. This decision was in direct response to both State Park and Chinatown stakeholders. Located within a short walk to many Chinatown businesses and Metro’s L Line (Gold), this station also addresses the goal of creating a stronger connection with the Metro L Line and would also enhance transit access to the Los Angeles State Historic Park, Mission Junction, William Mead Homes, and the Los Angeles River. In addition to this significant modification in response to public input, the proposed Project stations were also redesigned to address public response to the initial design vision for the proposed Project, by reducing the size by 26 percent and updating the architecture to better reflect the neighboring communities. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. 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. 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.

Comment P709-5 I guess maybe McCourt didn't want us to know about his plan to invade our neighborhood with his urban gondola experiment. His people like to compare these gondolas to those in South America, but these would be much larger, with 40-person cabins swooping over us all day long, all year long, and very late at night. They would go directly over us, only 40 feet above our roof. How would you like to live under that?

Response P709-5 Refer to Response P709-4 for discussion of the Project Sponsor. 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 cities such as Toulouse, France, comparable urban 3S gondola systems 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 P709-6 Real estate is a big business, but some of us just want to live in our homes, and have some peace, security and stability in our community. Crazy projects like this threaten all of that. It's like we can't even own our little part of our neighborhood. We're at the mercy of a billionaire who can force his project on us.

Even today, there's still no feasibility study. All we have are McCourt's promises that this system will be safe, quiet, and take thousands of cars off the roads. Personally, I'm getting tired of billionaires making big promises they clearly can't keep, when it's all of us in the community who would live with the consequences.

People have told me, "You can't fight it. The people behind this are too rich and powerful. Just negotiate and get what you can." But I look at it another way. I shouldn't be bullied into selling my home and losing my community. I shouldn't be told, "This gondola is happening, so you can either sell and leave, or you can live under it." I don't want to be threatened or intimidated.

We are a lower income community, a community with many non-English speakers, a lot of renters. McCourt probably figured we wouldn't have the resources to fight him in court, and in some ways that might be true. But I'm grateful that The California Endowment is fighting back with their lawsuit. I'm also grateful for any allies who will join us in this fight. I'm grateful that you are here today, because I know that by joining forces we can be stronger than McCourt ever thought.

Thank you.

Response P709-6 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. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. Refer to Response P709-2 and P709-4 regarding the sufficiency of the Draft EIR and how the proposed Project's public outreach and engagement process meets CEQA's requirements. The Draft EIR itself serves as a "feasibility study" for the proposed Project, analyzing the proposed Project's potential environmental impacts. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language.

Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the operational noise impacts of the proposed Project, which would be less than significant. 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 travel. 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 features of the proposed Project. This comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Topical Response C, Project Features, for discussion of the proposed Project's 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, 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.

Comment P709-7 Privacy

A gondola cabin approaching my home on Savoy Street would have a view looking into my living room window, and then into my bedroom if the bedroom door is open. You could literally see my bed. This is when the gondola is approaching my home, not when it is directly over my property. This is why my neighbors and I need more information about the "smart glass" system and how it would be implemented. When or where would the windows of the gondola cabins automatically fog up, and which windows would actually fog up. I imagine that LA ART would like to keep this to a minimum because it would be annoying and disconcerting for gondola passengers if the windows are constantly fogging up. Would the gondola operator be able to disable this feature easily, and how would we file a complaint if we notice it's not working?

Response P709-7 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. The proposed Project would be

located in a densely populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon, and New York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, Gondola Design and Operations and 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. 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. 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, and 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.

Comment P709-8 Future development

The preferred alignment would fly within my air rights at 451 Savoy St. However, The Gondola is a private company's project, and private companies cannot use eminent domain. This suggests that Design Option A is the only viable alternative because we are not transferring our air rights to The Gondola Project. However, Design Option A crosses over the airspace of Cathedral High School, a historic property. Has the high school given permission to use their airspace for this project?

Even if this design option is chosen, which does not require the airspace directly over my property, The Gondola could still affect my ability to build or rebuild on my property should the need arise (natural disaster, fire, a gondola catastrophe, etc.). It would be detrimental to the value of any upper floor units that would have windows at approximately gondola level as they pass by our property. It could also prevent the use of a crane or other tall equipment to assist in the construction.

Response P709-8 As discussed in Section 2.0, Project Description, 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. As described throughout the Draft EIR, the proposed Project would require aerial easements for certain properties along the proposed Project (see Sections 2.5 of Section 2.0, Project Description and 3.11.1, Figure 6-12 of Section 3.11, Land Use and Planning). Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. 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. Refer to Appendix Q, Proposed Alignment Plan and Profile, for an overview of aerial rights requirements as part of the proposed Project, including over 451 Savoy Street. How the Project Sponsor acquires the aerial rights for the proposed Project is beyond the scope of the Draft EIR.

Comment P709-9 Noise Study

In the noise analysis, the noise from the LA ART gondola stations is estimated using a model developed by Rossi in 2011. I am requesting an explanation of this model and its limitations that a lay person can understand. Although a list of assumptions is provided, there's not really a discussion about the soundness of these assumptions.

I'm concerned that the noise analysis underestimates the noise from the gondola cabins. People tend to be drunk or rowdy after Dodger games and events. This will create more noise than inside the gondola cabins that are flying over our homes until midnight than is described in the DEIR. There will not only be the average and consistent noise, but also the hooting and hollering that is disturbing to peaceful enjoyment of our homes, and shouldn't be averaged out in the noise analysis. The DEIR also should account for peak noise from a person screaming in the cabin.

Response P709-9 Refer to Topical Response P, Gondola System Noise Modeling, of the Final EIR, for discussion of the noise model used to predict noise levels from operations of the proposed Project and how use of the Rossi Article's equations to evaluate the proposed Project's operational noise was appropriately validated and has been shown to result in a conservative assessment of the noise generated by the proposed Project.

Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the operational noise impacts from the proposed Project, which would be less than significant. The impact analysis included an evaluation of potential operational noise impacts resulting from the gondolas passing close by occupied buildings, including sensitive uses. As noted on page 3.13-57 of the Draft EIR, an analysis was conducted to evaluate the noise from the gondola cabins as they travel between the stations, towers and junction in proximity to receptor locations. Cabin noise might be expected from the people traveling inside the cabin and any heating, ventilation, and air conditioning (HVAC) equipment associated with the cabin. The proposed Project would implement project design feature NOI-PDF-A that provides specifications regarding the interior-to-exterior noise reduction of the gondola cabins as well as the sound power level of the HVAC system. Refer to Response GO17-130 for analysis of operational noise impacts associated with sleep disturbance, which includes an analysis that uses the Sound Exposure Level (SEL) acoustics metric. As identified therein, operational noise impacts associated with

sleep disturbance would be less than significant. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how standard operating hours for the proposed Project would typically be between 6:00 AM and 12:00 AM, subject to operational changes due to ridership demand.

Comment P709-10 If we're comparing transit systems, the Portland system does not run as late and serves people who are going to a hospital. That's a very different situation. The LA ART Gondola would serve a major events stadium and flies low over a residential neighborhood AND will operate until midnight, possibly later in order to accommodate events that end late, such as the Elton John concert. For this reason, cabins need more soundproofing than glass that is similar to automobile glass.

Response P709-10 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 such as the Portland Aerial Tram demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential uses, including historical residential neighborhoods. Refer to Response P709-9 for discussion of the operational noise impacts of the proposed Project, which would be less than significant. As detailed in Section 2.0, Project Description of the Draft EIR, it is anticipated that the proposed Project would provide daily service between 6:00am to 12:00am, subject to operational changes in response to ridership demand, including to extend the hours for concerts and other events at Dodger Stadium.

Comment P709-11 The Elton John concert ended at 11:15pm. I am skeptical that for an event like that, the operator of the gondola would really stop running the system at midnight. This project would put a noisy station in the middle of a residential neighborhood and fly cabins with rowdy people very low my neighborhood. That is a lot of noise and disturbance to introduce into a residential neighborhood that includes children and seniors and many single-family homes that are over 100 years old that don't have modern soundproofing. My home is 127 years old, and my neighbor's home is 131 years old.

Response P709-11 Refer to Response P709-9 for discussion of operating hours for the proposed Project. As discussed on page 2-42 of Section 2.0, Project Description, of the Draft EIR, standard operating hours would be between 6:00 AM and 12:00 AM, subject to operational changes due to ridership demand. Due to anticipated nighttime operations, Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, analyzed both daytime and nighttime operational impacts, which would be less than significant.

Comment P709-12 Los Angeles State Historic Park

The DEIR does not include any renderings showing the Broadway Junction as viewed from inside LA State Historic Park. Given that it sits on the bluff on Broadway, and is

98ft tall, this will be a huge part of the view. There is currently nothing of this size and scale on Broadway next to the park.

Response P709-12 The Draft EIR addressed aesthetic impacts in Section 3.01, Aesthetics, with supporting data provided in Appendix C, Visual Impact Assessment, of the Draft EIR. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. 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. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park “visually memorable.” As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant.

While the Draft EIR and Visual Impact Assessment did not determine that the specific view of Broadway Junction from the park was significant, they did specifically address and disclose potential impacts on changes in the visual environment and existing viewsheds into and from within the park, as well as analyzed visual impacts that could occur as a result of the addition of Broadway Junction.

The Draft EIR included the identification of six Landscape Units (LUs) divided into thirty Key Observation Points (KOPs). LUs 4 and 5 specifically addressed potential alterations to the visual landscape as a result of the addition of Broadway Junction, and nine KOPs simulated views of or from the park. The Draft EIR recognized the potential visual impact that could occur as a result of the addition of Broadway Junction, noting that its 98-foot height could alter changes to views as compared to the existing landscape. However, the analysis conducted for LU 4 and LU 5 explained that the design of Broadway Junction would include architectural styles, colors, and materials that are comparable and similar to the aesthetic make-up of the surrounding urban environment. The design also includes the addition of new trees and landscaping below the junction that would create a visual improvement over the existing fencing. Finally, the height of Broadway Junction is comparable in height to future development approved for addition to the area. Overall, the design would ensure the addition of Broadway Junction would not greatly alter the existing or approved future aesthetic of the surrounding environment or distract from any surrounding viewsheds. The Draft EIR additionally analyzed nine KOPs that simulated views of or from within the park that were chosen in consultation with responsible

agencies. 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.

As a result of this analysis, 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, the Final EIR includes additional KOPs to further analyze viewshed impacts to Los Angeles State Historic Park. Refer to Appendix H.1, Memorandum Regarding Preparation of KOPs, and Appendix H.2, Supplemental KOPs in Response to Comments, of this Final EIR, for a discussion of the supplemental KOPs' preparation and the supplemental KOPs, respectively. As demonstrated by these supplemental KOPs, 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 as shown in the simulated views. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for an evaluation of the updated and additional KOPs for the proposed Project which would not result in significant impacts, and the aesthetic impacts of the proposed Project would remain less than significant.

Comment P709-13 Reliability and Safety

The 3S gondola in Toulouse, France has not been reliable so far. It broke down 5 times in the first month, and then went off-line for two weeks only three months after opening, to perform their annual maintenance. Then it broke down again two months later. It broke down one time and left a teenage boy stuck in the hot cabin for 1 hour. It broke down again last week, on January 10, 2023, because of a computer malfunction. This is not yet proven technology for public or urban transit. Teleo has a much smaller rated capacity. A larger capacity system, as proposed for LA ART, is probably even harder to maintain.

Response P709-13 Although forms of aerial transit technology have been available and utilized for the last 100 years, modern applications have seen the evolution of the technology as a feasible mode of urban rapid transit. Refer to Topical Response M, Comparable Systems, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world operate safely, efficiently, and in concert with their surrounding urban environments. In addition, as discussed in Section 2.0, Project Description, of the Draft EIR, the proposed Project would require routine maintenance that would be performed by the system operator. Operational disruptions resulting from equipment issues would be minimized through robust design and periodic and preventative maintenance.

Comment P709-14 Alpine Tower

Taking another lane from Alameda for the Alpine tower seems shortsighted. This takes away space on Alameda Street for this project that could be put to better use, such as a bike lane or bus lane. Chinatown has practically no bike lanes.

Response P709-14 This comment suggests that the Alpine Tower would require that a traffic lane on Alameda Street be eliminated. This is not accurate. A comparison of the Alpine Tower | Existing diagram on page 25 and the Alpine Tower | Build-Out diagram on page 31 in Appendix B, Construction Assumptions, Exhibit 1, Overview of Construction Phasing and Area Conditions, of the Draft EIR shows that the same number of travel lanes will be provided on Alameda Street after construction of the Alpine Tower is complete as there are under existing conditions. Moreover, the Alpine Tower would not preclude the City repurposing existing space on Alameda Street for other uses.

Comment P709-15 Land Use Compatibility

I am not aware of any other 3S gondola systems with open air stations or junctions that are situated in a residential neighborhood and this close to homes. This seems like an incompatible use that would be incompatible with the City of LA's land use and zoning. Yet in the draft EIR, LA ART claims that this project is compatible with the City's land use policies. This seems highly unlikely to us, especially because representatives from LA ART made public comments to the City Planning Commission asking for the Downtown Community Plan to consider provisions for aerial transit.

Response P709-15 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. Such comparable aerial transit systems include open air stations in residential areas. The Draft EIR addressed land use compatibility in Section 3.11, Land Use and Planning, of the Draft EIR. As discussed in Section 3.11, an analysis of land use compatibility was provided which addressed whether the proposed Project would be compatible with the land use plans and policies applicable to the Project alignment in terms of use, size, intensity, land use designation, density, scale, or other factors. In addition, a consistency analysis of the proposed Project was conducted with local plans and documents including the Dodger Stadium Conditional Use Permit, and the City of Los Angeles General Plan, including the Community Plans, Alameda District Specific Plan, Cornfield Arroyo Seco Specific Plan, City of Los Angeles Municipal Code and RIO District Ordinance.

The proposed Project's consistency with plans, programs and policies was also further analyzed in other sections of the Draft EIR including Air Quality (Section 3.3), Transportation (Section 3.17), Open Space (Section 3.16), Public Facilities & Services (Section 3.15), Noise (Section 3.13), and Housing (Section 3.14). Refer to Section 5.0,

Corrections and Additions, for a discussion of the proposed Project’s consistency with the recently adopted Downtown Los Angeles Community Plan.

Comment P709-16 I would like to include this document in the record for the DEIR for this project: “Gothenburg – Cable Car Best Practices Report.” This report from 2016 has a review of 3S Gondola systems and considerations for implementing such systems with an intermediate station. The following are excerpts from the report, which I believe are relevant to the DEIR for the LA ART Gondola to Dodger Stadium (https://www2.trafikkontoret.goteborg.se/resourcelibrary/underlagsrapport_best-practices.pdf):

“To address this question, CCC compiled and documented all tricable detachable gondolas (3S) in the world. It was found that at the time of this report's writing (January 2016), only thirteen 3S systems were operational while six 3S cable cars were in the various stages of planning and construction.”

“However, only two 3S systems are built with mid-stations. This suggests that it is very challenging to directly address best practices for 3S systems with upper floor mid- stations. To further compound this challenge, Gothenborg's cable car system is still undergoing planning and review and therefore, specific design specifications of the system (i.e., location of multi-storey stations, location of return/drive station and etc.) were not disclosed to the Consultants. As such, CCC can only discuss and answer the aforementioned question and best practices for upper level gondola stations in generalities.”

Response P709-16 Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how, due to the length and geometry of the proposed Project, the proposed Project would include three passenger stations and one non-passenger junction, which include the Chinatown/ State Park Station and the Broadway Junction as two intermediate components along the proposed Project alignment. The Broadway Junction would be a non-passenger facility that is required for the proposed Project system in order to turn the cables of the proposed Project and remain along the alignment. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world. Since 2016, additional 3S gondola systems have been constructed with mid-stations, including the Eisgratbahn in Austria and TÉLÉO in Toulouse, France.

Comment P709-17

<i>Operational Challenges</i>	<i>Comment / Description</i>
<i>Location of Drive vs Return Stations</i>	• <i>Station will need to be designed appropriately to handle the forces/stresses applied onto building depending on the final locations of drive and return stations.</i> • <i>Return stations have less infrastructure components while drive stations have more</i>

	<i>function-related components (i.e. main drive machinery, auxiliary motors, diesel generator</i> • <i>Drive stations are generally built over two floors. The machinery room is often times built beneath the station to reduce noise.</i>

Response P709-17 Refer to Section 2.0, Project Description, of the Draft EIR for discussion of the mechanics of the proposed Project system, including the locations of the “drive bullwheels” and the “return bullwheels.” The proposed Project will not include diesel generators. The proposed Project will 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. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of how the operational noise impacts from the proposed Project would be less than significant.

Comment P709-18

<i>Accessibility Requirements</i>	• <i>To ensure universal access, many transit agencies now require elevator access for above ground stations. The number and height of elevator systems can add sizable costs and design complexities to a project (i.e. space requirements for elevators). For instance, multi-storey stations may require up to four elevators to provide sufficient service in order to provide access to both sides of the platform. It is also needed in an event that one malfunctions, there's a backup elevator.</i>

Response P709-18 Refer to Section 2.0, Project Description, of the Draft EIR for discussion of the vertical circulation elements of the proposed Project. At Alameda Station, vertical circulation elements (i.e., elevators, escalators, stairs) for pedestrian access 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 parking and loading area for El Pueblo. On the east, vertical circulation elements would be introduced at-grade from the planned LAUS Forecourt. At Chinatown/State Park Station, access to the boarding platform would be from the mezzanine via elevators, escalators, and stairs. Access to the mezzanine would be available via elevators, escalators, and stairs from the ground level. At Dodger Stadium Station, cabins would arrive and depart from an at-grade boarding platform, with the passenger queuing area also at-grade. In addition, refer to Section 2.0 and Topical Response J, Gondola Design and Operations, of the Final EIR, for discussion how the station boarding process and cabins would

comply with all accessibility requirements of the Americans with Disabilities Act (“ADA”). Pathways to 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.

Comment P709-19

<i>Changing Heavy Machinery and Parts</i>	• <i>For multi-level stations, a strategy to change heavy machinery and parts (i.e. gearboxes, motors and etc.) will be required in case parts are broken</i> • <i>For instance, if a station is 4 storeys high, project proponents must design and have strategies in place to remove and deliver machinery</i>

Response P709-19 Refer to Section 2.0, Project Description, of the Draft EIR for discussion of how bridge cranes would allow the insertion or removal of equipment as may be required for maintenance activities. 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 how maintenance would be performed by the operator and would include daily observation of the overall system as part of the startup routine.

Comment P709-20 *“High ridership cable cars must be built with sufficient loading space throughout the station. Poor queuing strategies may reduce passenger satisfaction and safety.”*

“The Funivia del Renon is one of the few, if not only, 3S cable cars with a loading/unloading platform built on the second floor. Unfortunately, due to its popularity during high season, low capacity, poor queuing strategy and limited station footprint, this results in an overflow of passengers queuing haphazardly along the staircase.”

“However, sensitively incorporating a 3S cable car into an elevated mixed-use building adds complexity to a project. Designers must deal with issues related to noise, vibration, space availability and perhaps most importantly, access.

A loading platform located many storeys above ground level will exacerbate this problem and will require an accompanying system of elevators, stairs and/or escalators. The capacity of these systems linking to platform can ultimately limit (i.e., bottlenecks) the overall capacity of the cable car.”

Response P709-20 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 how 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. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of queues. 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 how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of how the operational noise impacts from the proposed Project would be less than significant.

Comment P709-21 Traffic / Transportation

How would the Dodger Stadium gondola station affect Circulation of Vehicles and pedestrian traffic around the Downtown Gate? Will it cause a bottleneck before and after games? I ask that an analysis of the vehicle circulation around the Dodger Stadium gondola station be done.

If people who are waiting in line for the gondola after a game or event become restless after 1 or 1.5 hours, won't many of them start walking down the road at the Downtown Gate? This seems like a likely outcome. Walkways need to be provided between the Gondola Station and Stadium Way for this purpose. Where there are already sidewalks, they need to be widened, improved, and maintained. This needs to be done regardless of whether there is a ticketing system for people to reserve tickets after games and events, in case the ticketing system goes down.

Will the LA ART Gondola bring more rideshare traffic into my neighborhood, which is close to the Downtown Gate? Residents in some neighborhoods around Dodger Stadium have reported rideshare drivers using their neighborhoods as waiting areas, and noted that the rideshare companies actually encourage it by paying them a bonus. Will this happen in my neighborhood? There needs to be mitigation for this likely impact. This is just one example of how this gondola project would likely bring more traffic, congestion, and pollution into our neighborhoods, not less.

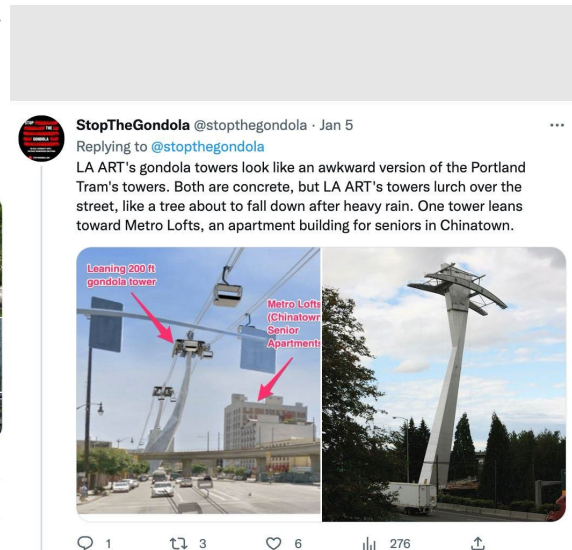
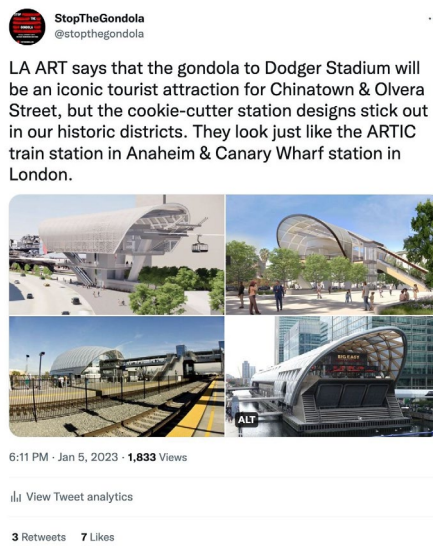
Response P709-21 Traffic congestion is not required to be analyzed under CEQA in the Draft EIR following the implementation of Senate Bill 743, which designated “vehicle miles traveled” as the method for assessing transportation impacts on the environment for CEQA projects. The proposed Project is not expected to increase the number of pedestrians or vehicles accessing Dodger Stadium. The vast majority of visitors drive their personal vehicles to access Dodger Stadium. 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. As such, the number of vehicles approaching the Downtown Gate would likely decrease, rather than increase. Within the Dodger Stadium parking lot, people walking between the

stadium to the Dodger Stadium Station would be managed via traffic control officers pre- and post-game and would not affect circulation outside the Downtown Gate.

The Los Angeles Dodgers only allow transportation network company (“TNC”) vehicles, e.g., Uber and Lyft, to enter the Dodger Stadium property via the Sunset Gate A since pick-ups occur in Lot 11 near the Sunset Gate. In addition, the Sunset Gate A is the only gate that allows inbound traffic after a game.⁴² Therefore, the proposed Project is not expected to increase the number of TNC vehicles near the Downtown Gate.

Refer to Topical Response B, Ridership Model; Queueing and Pre-game and Post-game Transportation, for discussion of post-game transportation management, including the potential for proposed Project riders to leave Dodger Stadium via other modes such as rideshare or walking.

Comment P709-22 Aesthetics



Gondola station and designs should not be cookie cutter or generic. This would be built at the birthplace of our city. LA ART claims this will be iconic, but how is the design iconic? There is no sense of place. Stations look generic and towers are a stark gray concrete. We don't need more gray concrete in our historic neighborhoods. The cabins also appear to be standard cabins.

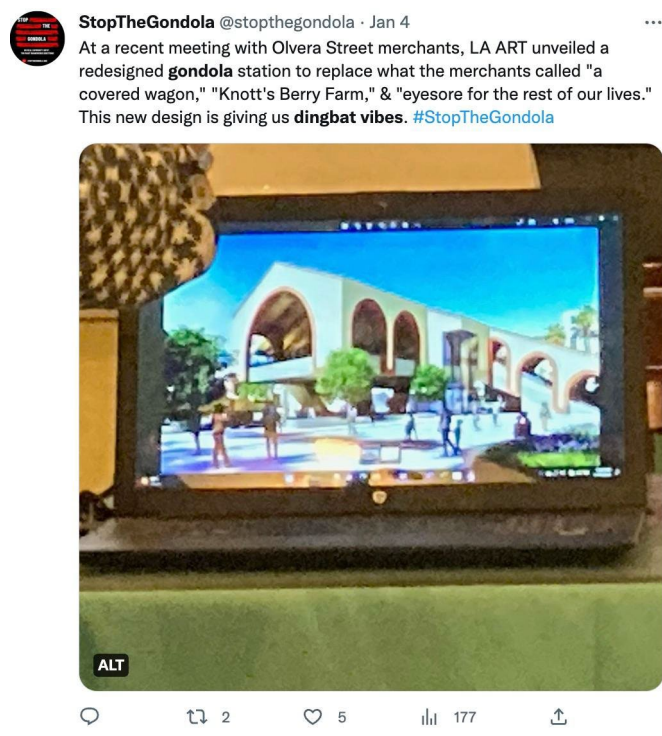
Response P709-22 Refer to Topical Response C, Project Features, for discussion of how the proposed Project’s design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. The Project Sponsor would utilize local artists for site specific artwork at each station reflective of the unique neighborhood culture, and would create numerous opportunities to collaborate with

⁴² Los Angeles Dodgers. 2022. Car Service and Taxi. Available at: <https://www.mlb.com/dodgers/ballpark/transportation/car-service-and-taxi>. Accessed August 2023.

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. In addition, the proposed Project's cabins could feature artwork from local artists or other community programming.

Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the location and design of the stations, towers, and junction for 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's stations, towers, and junction, which would be less than significant, and for visual simulations of each component. 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 Alameda Tower's modern architectural style is evident and would complement the buildings within The California Endowment. The neutral light-tone gray color scheme of Alameda Tower was designed for consistency with the surrounding urban environment, and to not distract from visually distinct structures such as the United States Post Office Terminal Annex building. Both the Chinatown/State Park Station and Alpine Tower would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and their design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. The Broadway Junction was designed to create a pattern evocative of layered bamboo canes, while still achieving a transparency that brings lightness to the form. In addition, the canopy of the Broadway Junction was designed to reflect warm tones and detailing that is complementary to the existing structures and the residential fabric in the surrounding urban environment. The Dodger Stadium Station and Stadium Tower would consist of an architectural design that provides visual lightness to the form to complement the existing buildings in this area. In addition, the neutral light-tone gray colors and material finishes of the Dodger Stadium Station and Stadium Tower were selected to complement the surrounding urban environment, and to not distract from existing visually distinct structures, such as Dodger Stadium.

Comment P709-23



The "improved" station design that was recently presented to a group of El Pueblo merchants looks awkward, and like a dingbat, which is more of a mid-century style.

Response P709-23 Refer to Topical Response C, Project Features, for discussion of how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area, which would be discussed with identified stakeholder groups. Refer to Response 709-22 for a discussion of the proposed Project's Alameda Station design.

Comment P709-24



The tower leaning towards Metro Lofts looks like it could fall on the building. Even if it's engineered not to, it looks like it could fall down, which is bad Feng Shui. This seems culturally insensitive, considering that many Chinese seniors live at Metro Lofts.

Response P709-24 Refer to Section 2.4.1, Design, of Section 2.0, Project Description, of the Draft EIR, for a discussion of how the proposed Project's towers were designed to not impede adjacent vehicular and pedestrian circulation, while supporting the ropeway and cabins that are primarily aligned above the public ROW. The neutral-light tone grey is intended to conform with the surrounding environment and will not provide a highly metallic or mirrored finish to minimize glare. Refer to Appendix F, Memo on Structural Engineering, to this Final EIR for a discussion of how the proposed Project's stations, junction, and towers were designed to 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, including all impacts from the height and tilt of the structures, to ensure structural integrity and safety.

Comment P709-25 Alternatives

More alternatives should be studied. There are many ways to strengthen or build upon the existing infrastructure. The Yale Street bridge that crosses the 110 FWY needs more lighting. This would be a benefit to both residents and Dodgers fans. People have long talked about adding stairs and escalators up the hill to Dodger Stadium. They have those in Medellin, Colombia as well.

"How giant outdoor escalators transformed a Colombian neighborhood"
<https://www.cnn.com/travel/article/colombia-medellin-neighborhood/index.html>

"Tear Up the Dodger Stadium Parking Lot"

<https://legal-planet.org/2018/11/02/tear-up-the-dodger-stadium-parking-lot/>

Response P709-25 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." (CEQA Guidelines, § 15126.6, subd. (a).) Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how, as required by CEQA, the alternatives analysis included evaluation of the No Project Alternative in order to determine the consequences of not implementing the proposed Project. (See CEQA

Guidelines § 15126.6, subd. (e).) CEQA also requires that an EIR identify one “environmentally superior alternative” from the range of reasonable alternatives that are evaluated; the “environmentally superior alternative” cannot be the “No Project” alternative or the underlying project. The Draft EIR considered a “No Project Alternative,” the Spring Street Alignment Alternative, and the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express. 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. Further, in compliance with CEQA Guidelines section 15126.6(c), Section 4.2.1, Alternatives Considered but Dismissed from Detailed Analysis, 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. Section 4.2.1, Alternatives Considered but Dismissed from Detailed Analysis, 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. The Draft EIR adequately identifies and analyzes a reasonable range of alternatives in full compliance with CEQA’s requirements. Refer to 5.0, Corrections and Additions, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which 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. While this alternative would provide improved pedestrian connections compared to existing conditions, the 25 minute plus travel time from the Metro L Line (Gold) Station to the location of the proposed Dodger Stadium Station would be at least nine times greater than the three minute travel time between those two locations with the proposed Project, and this alternative would be unlikely to attract substantially more people to walk to Dodger Stadium compared to existing conditions given the travel time and the physical exertion. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project.

Comment P709-26 Please also include in the record the following statement that I made at the January 12, 2023, DEIR meeting:

I'm Phyllis. I live over there. The gondola would fly over me and my neighbors. And my house would face the mouth of the noisy Broadway Junction, a 98ft tall turning station.

Response P709-26 This comment refers to Comment P525-1. Refer to Response P525-1.

Comment P709-27 I think you've seen how this hearing is not right, the way they are taking public comment. It's been like this since the beginning. Trying to hide, and not let it get out about how horrible this project is.

This project is not for us. This project is for Frank McCourt who is a developer, it's for the Olympics, which is for developers, and it's for the politicians who are in the pockets of developers. Frank McCourt wants to build right over us, 40 ft over my neighborhood, as if we're nameless faces. But we're not. We're a real community. I'm glad my sister and my neighbors are here tonight, as well as all of these residents and supporters in the larger community. It's really great to see people show up for each other and speak out.

Response P709-27 This comment indicating opposition to the Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and during the four public hearings. Comments on the Draft EIR could be submitted by email to LAART@metro.net, by mail to One Gateway Plaza, Mail Stop 99-22-6, Los Angeles, CA 90012, or over the phone by calling (213) 922-6913. Comments could also be submitted at each of the four public hearings. At virtual public hearings, comments could be given verbally. 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. At the two public hearings held in person, comments could be submitted either in writing on forms provided by Metro, or verbally to the court reporters who were set up at a "comment station" in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during all four public hearings, with interpretation provided in Taishanese during the final two public hearings. 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. Refer to Response P709-4 for discussion of outreach and community engagement during the Draft EIR scoping period and the Draft EIR public review period.

Comment P709-28 There have been so many lies about this project from LA ART. But we know what this project is really about. Frank McCourt wants to build a giant complex up at the Dodger Stadium parking lot. It's not a secret. If he has a permanent transit stop, that would give him incentives to build a massive development there.

Response P709-28 Refer to Section 2.0, Project Description, of the Draft EIR for a description of the proposed Project, and Section 2.3.7, Purpose and Need, of the Draft EIR for an overview of the need for the proposed Project. Refer to 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 for discussion of how the proposed Project solely proposes an aerial gondola system. 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. 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.

Comment P709-29 This project makes no sense. At max capacity, it can only handle a fraction of the attendance at Dodger Stadium, and how do you think they're getting to the gondola? By driving, most of them. You're only saving the last 1.2 miles. Maybe some will take transit, these are probably the same people who would have taken the Dodger Stadium Express, which we support. Let's support expanding and electrifying the Dodger Stadium Express, better enforced bus lanes, more bike lanes, better sidewalks, and an escalator up the hill for pedestrians. Not this boondoggle gondola.

It doesn't help traffic.

It doesn't connect us to parks or transit.

Those are lies.

Response P709-29 Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. 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. Refer to Response P709-25 for discussion of the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express and the Pedestrian Enhancement Alternative. The Transportation Systems Management Alternative for an enhanced Dodger Stadium Express 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. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. 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. 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. The proposed Project would be free to ride for anyone with a ticket to a Dodger game. In addition, and 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 P709-30 What it does is turn Chinatown into Dodger Stadium's parking lot. It takes away parking for businesses, it increases noise with this gondola running constantly, 18 hours per day, 6am to 12am. Not to mention the invasion of privacy.

Response P709-30 Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the 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.. Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR, for discussion of the operational noise impacts from the proposed Project, which would be less than significant. Refer to Response P709-7 regarding privacy.

Comment P709-31 This gondola mows down the entrance of LA State Historic Park. That's OUR space. The whole point of a park in a city is for people who live in a dense urban environment, to get away from all that and to have some peaceful enjoyment in open space with

open skies. It wasn't so that Frank McCourt could fly 5-ton metal cabins 26 ft over our heads.

Response P709-31 Refer to Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, for discussion of the footprint of the proposed Project in the Los Angeles State Historic Park. With the small footprint of the proposed Project's Chinatown/State Park Station, and the required clearances and the height at which the cabins would cross over the Park, the ability to use the vast majority of the Park would not be affected by the proposed Project. Furthermore, 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. Refer to Response S2-4 for additional discussion regarding the ability of uses to continue at the park. 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 P709-32 McCourt wanted to divide us in my neighborhood, buy us out, buy some of my neighbors out, so that we would quietly go away. He wanted to fly under the radar with this project, keep everything hush hush, and get the project approved before anyone knew what was going on. In 2018, they said it could be running by 2022. Remember that?

Response P709-32 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. Refer to Response P709-4 for discussion of outreach and community engagement during the Draft EIR scoping period and the Draft EIR public review period.

Comment P709-33 My neighbors and I never even had a say about this project going over our neighborhood. And now Climate Resolve is putting their greenwashing slime all over it? It's disgusting!

Response P709-33 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. Refer to Response P709-32 for discussion of the Project Sponsor.

Comment P709-34 You'll hear some people say, "but the gondola will be so great, it will be iconic." Yeah, it'll be iconic alright. An iconic monument to injustice.

We're here to call it for what it is. A scam. And a shame. If you're standing up and supporting this, you need to wake up. You're teaming up with Frank McCourt who bankrupted the Dodgers. You're teaming up with those who erased the original Chinatown, and evicted the residents of La Loma, Bishop and Palo Verde to build Dodger Stadium. You're choosing that side of history. And you really don't have to.

We're speaking out because we know the gondola sounds good at first, in theory — it's like, oh it would be so cool and fun — but there's a whole lot more to it. Some people, I think a lot of people, the ones who aren't greedy bastards, do come around. But we need everyone's help, so thank you for being here. We can do this together. Stop The Gondola!

Thank you.

Sincerely,

Phyllis Ling

Response P709-34 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. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. Additionally, refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world and their operations, integration with nearby residential and open space uses, features to enhance and provide additional benefits to the surrounding communities, promotion of public art and collaborations with local artists, and evidence that such systems can reduce violent crime in nearby areas and promote a sense of security compared to other modes of public transportation. 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. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine.

Comment Letter P710 - Phyllis Ling #3

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to P710

Comment P710-1 Dear Mr. Zelmer

Please include the following attachment as comments for the LA ART Project DEIR.

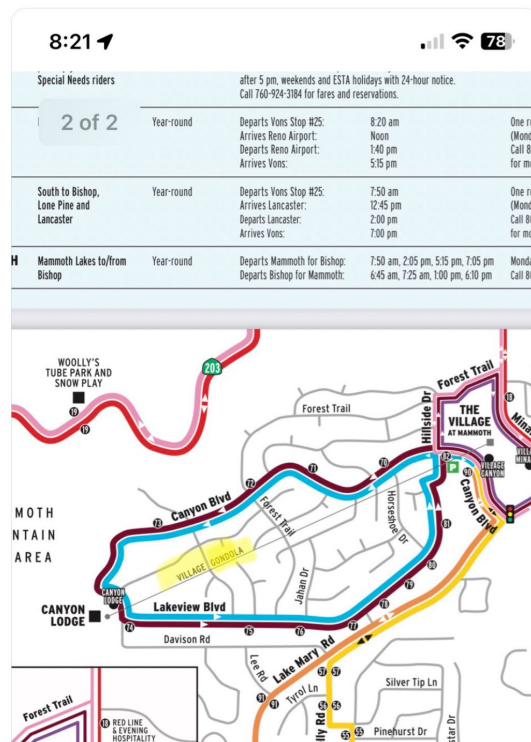
Sincerely,
Phyllis Ling

Response P710-1 This comment provides a general introduction to the comments raised in this letter. This comment letter appears to copy and paste tweets from Twitter. These tweets are general commentary on the proposed Project, many of which were not submitted by the original author, and do not provide substantive comments on the Draft EIR warranting a further response. Nevertheless, responses to the comments contained in this letter are provided in Responses P710-2 through P710-6.

Comment P710-2

Will Proctor
@WillProctor14

It turns out that gondolas do not have enough capacity for areas with high peak demand like a ski resort (or say a baseball stadium). As a result of gondola overcrowding, Mammoth Lake's most frequent bus (blue line) parallels the gondola.



Response P710-2 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. The gondola from The Village in Mammoth Lakes to the Mammoth Mountain Ski Area was not intended to provide sufficient capacity to be the sole method of transportation to the ski area. It is one of three modes that are available to obtain access to the ski area: driving, the Mammoth Lake's bus system, and the gondola. In fact, the gondola is the most recent of these modes to be provided and supplements the other two modes. Similarly, the proposed Project would not be the only mode of transportation to Dodger Stadium and would supplement the other available modes. 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.

Comment P710-3



Response P710-3 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. 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. 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. 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. 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. As discussed in Topical Response N, Environmental Justice, 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 associated air pollution and improving safety. 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. 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. Further, comparable aerial transit systems in other countries have brought benefits to their surrounding areas by connecting disparate neighborhoods, promoting commerce, beautifying communities, and enhancing transit system rider safety.

Comment P710-4



StopTheGondola @stopthegondola · Dec 29, 2022

...

In addition to destroying the entrance at LA State Historic Park, the LA ART gondola to **Dodger Stadium** would fly only 26ft over a hill where there are several thriving **oak trees**. **Trees** must be protected, not sacrificed for a private developer's tourism project. [#StopTheGondola](#)



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**Response P710-4**

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. 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. 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. 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. 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. 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 3.04-23, in Section 3.04, Biological Resources of the Draft EIR, and in Appendix K.1., Updated Tree 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. 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. Refer to Response P710-3 regarding the Project Sponsor.

Comment P710-5

Response P710-5 This comment indicating opposition to the proposed Project 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. Refer to Response 710-4 for a discussion of how, 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 would not be affected by the proposed Project.

Comment P710-6



Phyllis Ling @aPhyllisLing · Oct 17, 2022

Poor bird. I hear geese or ducks fly over my **neighborhood** a lot, and wonder if they would be spooked by the towers & steel cables of Frank McCourt's **gondola**, especially at night. The last thing **Dodgers** need is bad karma from injured birds. [#StopMcCourt](#) [#StopTheGondola](#)



Jon Christensen @the_wrangler · Oct 16, 2022

Some believe a goose jinxed the @Dodgers. I believe it was Frank McCourt, who thought a winning season and pennant race presented an opportunity to foist his latest scheme on the team: a gondola to the stadium and a huge entertainment complex on the parking lots. [#stopthegondola](#)



Response P710-6 The comment indicating opposition to the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. As discussed on pages 3.04-18 and 3.04-19 of Section 3.04, Biological Resources of the Draft EIR, the proposed Project alignment is not in or near a known avian migratory corridor and lacks habitat and topographic features that would promote concentrated avian migratory activity. 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 how the risk of avian collisions with the cables or components of the proposed Project is expected to be 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. 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. 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. The occurrence of the greater white-fronted goose that landed at Dodger Stadium in October 2022 that was cited as an example of lights attracting migrants is far from definitive. One example is not an indication of a widespread phenomenon. The fact that this greater white-fronted goose case gained nation-wide attention suggests it is not a particularly frequent occurrence. 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 Letter P711 – Miho Murai

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR, for reference.

Responses to P711**Comment P711-1** Deputy Executive Officer Cory Zelmer,

My name is Miho Murai and I am a Chinatown resident. I am also an At Large Board Member of the Historic Cultural North Neighborhood Council. I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("the Gondola Project") at Dodger Stadium. I am submitting this opposition on behalf of myself and not our Neighborhood Council. As a current resident of Chinatown living by the highly congested intersection of College and New Depot, I will be greatly impacted by this project.

Response P711-1 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. This comment provides a general introduction to the comments raised in this letter. Responses contained in this letter are provided below in Responses P711-2 through P711-5.

Comment P711-2 This is a ridiculous project that does not serve any benefits to our community. Rather, the Gondola Project will increase traffic around Chinatown and Union Station and will displace the traffic from Dodger Stadium and push it into the surrounding communities. The majority of the people who will likely utilize the Gondola will not be residents of Chinatown. Where will they park? As it is, the parking lot at Union Station is often full.

Response P711-2 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. 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. The proposed Project would be free to ride for anyone with a ticket to a Dodger 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. Refer to Topical Response C, Project Features, for discussion of the proposed Project's 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, 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 Project features.

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 the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines ("TAG"). Nevertheless, the 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.

Comment P711-3 In addition, the Gondola Project will impact historic and cultural places such as the Los Angeles State Historic Park, the historic Union Station, and El Pueblo de Los Angeles Historic Monument. The projected towers will obstruct views and will diminish the natural beauty of Chinatown and these historical landscapes.

Response P711-3 The Draft EIR fully analyzed and addressed the proposed Project's potential impacts to cultural resources, including to Los Angeles State Historic Park, LAUS, and El Pueblo, in Section 3.5, Cultural Resources, with supporting data provided in Appendix F, Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.5, the

Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the location and design of the Alameda Tower, Alpine Tower, and Stadium Tower. 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's towers, which would be less than significant, and for visual simulations of the proposed Project's towers. The Alameda Tower's modern architectural style is evident and would complement the buildings within The California Endowment. The neutral light-tone gray color scheme of the Alameda Tower was designed for consistency with the surrounding urban environment, and to not distract from visually distinct structures such as the United States Post Office Terminal Annex building. Alpine Tower would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and their design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. Stadium Tower would consist of an architectural design that provides visual lightness to the form to complement the existing buildings in this area. In addition, the neutral light-tone gray colors and material finishes of the Stadium Tower was selected to complement the surrounding urban environment in LU-6, and to not distract from existing visually distinct structures, such as Dodger Stadium. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area.

Comment P711-4 Finally, there has been a lack of transparency in how this project has been developing. For example, Metro went forward with this project without an open public process and without competitive bidding.

Response P711-4 This comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment P711-5 It is unclear who will actually own and operate this project. It is unclear who will be paying for its maintenance. Will these costs fall on taxpayers, such as myself and my neighbors, who are adamantly opposed to this project? The Chinatown community

does not need a tourist attraction but rather we need affordable housing, reliable public transportation, and a grocery store that caters to our elders.

Response P711-5 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. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which 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 proposed Project. Operation and maintenance costs are proposed to be fully funded out of Project revenues. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues, and would benefit the surrounding community by alleviating existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety.

Comment P711-6 As an active community member, I ask you to please consider the wishes and needs of our community before you allow this ridiculous project to move forward. Please listen to the voices of the community and give us an opportunity to be meaningfully heard. The Gondola Project does not serve our community in any way. Those who support the project do not live in Chinatown and will not be ones that will be impacted by this project.

Thank you for your time and consideration.

Sincerely,

Miho Murai

Chinatown Resident

Miho Murai

Mihomuraiesg@yahoo.com

852 N. Bunker Hill Avenue

Response P711-6 This comment provides a general conclusion regarding the comments raised in this letter. Responses contained in this letter are provided above in Responses P711-2 through P711-5. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical C, Project Features, for discussion of the proposed Project team's

outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefit to the surrounding community. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements, including hardscape and landscape improvements.

Comment Letter P712 – Phyllis Ling

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P712

Comment P712-1 Dear Mr. Zelmer,

I am OPPOSED to the LA ART Gondola Project.

Please include my comment letter and supporting document in the official file for the DEIR.

Sincerely,

Phyllis Ling

Response P712-1 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. All comments on the Draft EIR are included in Appendix C, Public Comments on the Draft EIR, and Appendix B, Public Hearing Transcripts, of the Final EIR. Consistent with CEQA, comments received on the Draft EIR were responded to in the Final EIR. The comment letter referred to in this comment is Comment Letter P709. Refer to Responses P709-1 through P709-34.

Comment Letter P713 – Maria Gritsch and Warren D. TenHouten

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P713

Comment P713-1 We are OPPOSED to the proposed aerial tramway to Dodger Stadium.

Please delete this plan.

Thank you in advance.

Maria Gritsch TenHouten

Warren D. TenHouten

Response P713-1 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. 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 Letter P714 – Christopher Roman

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P714**Comment P714-1** To Whom it May Concern:

I am very strongly in favor of this initiative. Innovative projects of this nature are key to encouraging the use of public transportation and reducing the volume of cars on our region's roads.

Response P714-1 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. 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. 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 P714-2 I live in Mozaic Apartments, immediately adjoining the proposed Union Station stop of the tram line. Every home Dodger game, I see a dramatic increase in car and bus traffic (particularly due to the extremely heavily used Dodger Express) around Union Station. Having an aerial tram carry these passengers would lessen the reliance of Dodger fans on traveling by road to the stadium, particularly a road that sees extraordinarily heavy traffic on game days. Even on non-game days, this tram would offer a convenient mode of transit to travel north on Alameda from Union Station to Chinatown and the LA State Historic Park area.

Response P714-2 Refer to Response P714-1 for discussion of the purpose and need for the proposed Project. Refer to Topical Response C, Project Features, discussing the proposed

Project's potential partnerships with and benefits to local businesses. 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.

Comment P714-3 Additionally, I think this development would be a positive one for this area, as it would be a major draw for tourists and an instant city landmark. It would bring more foot traffic and attention to historic Olvera Street and Union Station. Riding the tram would also be a fun leisure activity, offering fantastic views of the LA State Historic Park and the downtown skyline even on non-game days.

This is a unique and exciting opportunity, one that any world-class city should jump to embrace. I hope to see this project approved and constructed. Thank you.

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Christopher Roman

Response P714-3 This comment indicating support for the proposed Project is noted for the record and will be provided to the decision makers for review and consideration. Refer to Topical Response C, Project Features, for discussion of the potential added benefits from the proposed Project, including potential partnerships with and benefits to local businesses in Chinatown and at El Pueblo.

Comment Letter P715 – Xochitl Manzanilla

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P715

Comment P715-1 Dear Ms. Rockwell,

I'm writing to request a 45-day extension of the public comment period for the Los Angeles Aerial Rapid Transit Draft Environmental Impact Report so that the total comment period would be 90 days.

Response P715-1 The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Accordingly, the Draft EIR public review period was for the 90 days requested in this comment.

Comment P715-2 The community deserves to be heard and provided the opportunity to meaningfully participate in the CEQA process. We know that draft environmental impact reports like this one will likely be long and complex, requiring time to review and analyze the full details of this project.

Response P715-2 Refer to Response P715-1 for a discussion of the Draft EIR's 90-day public review period. Refer to Response P715-3 for discussion of the opportunities for public participation during the Draft EIR Public review period.

Comment P715-3 LA ART and METRO have failed to provide opportunities for our community members to ask questions, raise concerns, and provide meaningful input. We have not received information on important details of the project and will need sufficient time to review and understand it.

Response P715-3 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and

immediately after 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. 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. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language.

Comment P715-4 A 45-day extension to ensure proper community engagement is not only the right thing to do, it's necessary for a public comment period that would fall squarely during the holiday season when COVID-19 is likely to spike, thereby limiting the ability for proper outreach and education efforts.

Please do the right thing in extending the comment period by 45-days to give our neighborhoods an opportunity to review and participate after the holiday season.

Sincerely,

Xochitl Manzanilla

Response P715-4 Refer to Response P715-3 for discussion of the opportunities for public participation during the Draft EIR Public review period, including opportunities to participate in virtual public meetings and submit comments on the Draft EIR in writing via email or mail, and by phone, in addition to in-person during the four public hearings, to ensure accessibility for those unable to attend in-person meetings. Refer to Response P715-1 for discussion of how Metro extended the Draft EIR public review period an additional 30 days for a 90-day public review period ending on January 17, 2023.

Comment Letter P716 – Tany Ling

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P716

Comment P716-1 Dear Ms. Rockwell,

I'm writing to request a 45-day extension of the public comment period for the Los Angeles Aerial Rapid Transit Draft Environmental Impact Report so that the total comment period would be 90 days.

Response P716-1 The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Accordingly, the Draft EIR public review period was for the 90 days requested in this comment.

Comment P716-2 The community deserves to be heard and provided the opportunity to meaningfully participate in the CEQA process. We know that draft environmental impact reports like this one will likely be long and complex, requiring time to review and analyze the full details of this project.

Response P716-2 Refer to Response P716-1 for a discussion of the Draft EIR's 90-day public review period. Refer to Response P716-3 for discussion of the opportunities for public participation during the Draft EIR Public review period.

Comment P716-3 LA ART and METRO have failed to provide opportunities for our community members to ask questions, raise concerns, and provide meaningful input. We have not received information on important details of the project and will need sufficient time to review and understand it.

Response P716-3 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and

immediately after 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. 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. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project’s potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language.

Comment P716-4 A 45-day extension to ensure proper community engagement is not only the right thing to do, it's necessary for a public comment period that would fall squarely during the holiday season when COVID-19 is likely to spike, thereby limiting the ability for proper outreach and education efforts.

Please do the right thing in extending the comment period by 45-days to give our neighborhoods an opportunity to review and participate after the holiday season.

Sincerely,

Tany Ling

Response P716-4 Refer to Response P716-3 for discussion of the opportunities for public participation during the Draft EIR Public review period, including opportunities to participate in virtual public meetings and submit comments on the Draft EIR in writing via email or mail, and by phone, in addition to in-person during the four public hearings, to ensure accessibility for those unable to attend in-person meetings. Refer to Response P716-1 for discussion of how Metro extended the Draft EIR public review period an additional 30 days for a 90-day public review period ending on January 17, 2023.

Comment Letter P717 – Alex Ward

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P717

Comment P717-1 Dear Ms. Rockwell,

I'm writing to request a 45-day extension of the public comment period for the Los Angeles Aerial Rapid Transit Draft Environmental Impact Report so that the total comment period would be 90 days.

Response P717-1 The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Accordingly, the Draft EIR public review period was for the 90 days requested in this comment.

Comment P717-2 The community deserves to be heard and provided the opportunity to meaningfully participate in the CEQA process. We know that draft environmental impact reports like this one will likely be long and complex, requiring time to review and analyze the full details of this project.

Response P717-2 Refer to Response P717-1 for a discussion of the Draft EIR's 90-day public review period. Refer to Response P717-3 for discussion of the opportunities for public participation during the Draft EIR public review period.

Comment P717-3 LA ART and METRO have failed to provide opportunities for our community members to ask questions, raise concerns, and provide meaningful input. We have not received information on important details of the project and will need sufficient time to review and understand it.

Response P717-3 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and

immediately after 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. 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. The Draft EIR includes 7,877 pages of detailed analysis from experts in their respective fields, intended to provide the public and decision makers the information that they need to meaningfully consider the proposed Project's potential environmental impacts, as well as a shorter executive summary that explains the analysis and conclusions in clean and simple language.

Comment P717-4 A 45-day extension to ensure proper community engagement is not only the right thing to do, it's necessary for a public comment period that would fall squarely during the holiday season when COVID-19 is likely to spike, thereby limiting the ability for proper outreach and education efforts.

Please do the right thing in extending the comment period by 45-days to give our neighborhoods an opportunity to review and participate after the holiday season.

Sincerely,

Alex Ward

Response P717-4 Refer to Response P717-3 for discussion of the opportunities for public participation during the Draft EIR Public review period, including opportunities to participate in virtual public meetings and submit comments on the Draft EIR in writing via email or mail, and by phone, in addition to in-person during the four public hearings, to ensure accessibility for those unable to attend in-person meetings. Refer to Response P717-1 for discussion of how Metro extended the Draft EIR public review period an additional 30 days for a 90-day public review period ending on January 17, 2023.

Comment Letter P718

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Comment Letter P719

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Comment Letter P720

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Comment Letter P721

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Comment Letter P722

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Comment Letter P729

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Comment Letter P730 – Charles Robinson

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P730

Comment P730-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). I have lived in Los Angeles my entire life, and I have used public transport my entire life. The Gondola project wastes money and resources that could go towards increasing affordable, reliable public transit for Angelenos.

Response P730-1 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. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Topical Response N, Environmental Justice, for discussion of how 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. 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 P731 – Manohla Dargis

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P731

Comment P731-1 I am writing to express my vehement opposition to the Los Angeles Aerial Rapid Transit Project a.k.a. Frank McCourt’s preposterous and outrageous gondola project.

Response P731-1 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. 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. 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 P731-2 It is unimaginable that this rich man’s folly would have gotten this far if it had been proposed for a wealthy neighborhood like Bel Air – it would have been shut down *immediately*. The objections from community members and many others to this undemocratic proposal are informed and persuasive.

Response P731-2 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 P731-3 This project is terrible for people, terrible for the environment and terrible for the City of Los Angeles.

Response P731-3 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 feature. 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. 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. 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. Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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.

Comment P731-4 As Kathleen Johnson, the executive director of Los Angeles River State Park Partners, recently wrote in a letter that was published in The Los Angeles Times <<https://www.latimes.com/opinion/letters-to-the-editor/story/2023-01-12/frank-mccourts-dodger-stadium-gondola>>:

"Metro's opaque deal with former Dodgers owner Frank McCourt to build a gondola to Dodger Stadium through LA State Historic Park would severely compromise people's experience of the park, a taxpayer-funded green space that the area's historically underserved residents fought for decades to establish.

"The gondola would take public park land, destroy 81 mature trees, permanently alter the park's thoughtfully designed vistas, jeopardize park event revenues and vital maintenance, and threaten the park's significant historic features.

"These impacts on the park would be an environmental injustice. LA State Historic Park was born from an outpouring of community activism that transformed a rail yard into a green urban oasis, with all of the related health and community benefits. It is well used by residents, neighbors and visitors from throughout the city and has also become a vital, climate-resilient native landscape supporting local wildlife.

"After this long-fought struggle, people deserve to have their original designs and uses for the park respected and their public land protected.

"A project such as this would never be proposed over New York's Central Park, so why should the residents of Northeast L.A. be subjected to it?

Response P731-4 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. 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. 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.

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 3.04-23, in Section 3.04, Biological Resources of the Draft EIR, and in Appendix K.1, Updated Tree Report, and in Appendix E, Biological Resources Assessment, of the Draft EIR, and 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. 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.

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, which 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. 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. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park “visually memorable.” As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant.

The Draft EIR fully analyzed and addressed the proposed Project’s potential impacts to historic resources in Section 3.05, Cultural Resources, with supporting data provided in Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As discussed in Section 3.05, the Draft EIR’s analysis concludes that all potential impacts related to historical resources would be less than significant.

Comment P731-5 I also echo the concerns voiced in another letter to the Times <<https://www.latimes.com/opinion/letters-to-the-editor/story/2023-01-12/frank-mccourts-dodger-stadium-gondola>>, this one from Jon Christensen, an adjunct assistant professor at UCLA’s Institute of the Environment and Sustainability:

“A study conducted by my colleagues at the UCLA Mobility Lab <https://uploads-ssl.webflow.com/61c3996ce146bfa8fc27adeb/635c2657c071e02577a5c5a0_Report%20on%20UCLA%20study%20of%20gondola%20traffic%20impact%20102522%20.pdf> found that the gondola will not reduce traffic significantly on the streets and highways around Dodger Stadium on game days and, therefore, will not reduce greenhouse gas emissions.

“Furthermore, McCourt has not donated the project to Climate Resolve, according to county counsel. So why is Climate Resolve shilling for the project, while McCourt remains silent about his end game, a massive entertainment complex on the Dodger Stadium parking lots, which he has long touted?

“This is greenwashing, pure and simple. We have better solutions. The existing Dodger Stadium Express from L.A. Union Station is 19 times more energy efficient than the gondola would be per passenger trip. An individual electric vehicle is eight times more efficient.”

Response P731-5 Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. 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. 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. Refer to 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 for a discussion of how the proposed Project solely proposes an aerial gondola system. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express 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. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of how 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, pursuant to GHG-PDF-A.

Comment Letter P732 – Justin Dickerson

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P732

Comment P732-1 I oppose the proposed aerial gondola system between Union Station and Dodger Stadium called LA ART.

Response P732-1 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. 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 P732-2 As background, I live in Studio City, which has become a designated sacrifice community for the commercial benefit of Van Nuys Airport (VNY) and Burbank Airport (BUR).

Response P732-2 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 P732-3 I do not live near either airport, and there were not overflights here until the FAA implemented its NextGen airspace modernization program. FAA NextGen (1) concentrated what had been for decades a 6-mile wide dispersed departure path, (2) moved it 3 miles to the south, and (3) lowered the altitude for a long, slow ascent. As if this was not enough for a single community to bear from 2 airports, the FAA also layered in eastern arrivals and terrifyingly low wind arrivals.

Studio City now has near-constant low-flying aircraft overhead. The FAA chose Studio City to absorb extreme amounts of noise and pollution from 2 airports, and, worse, did so without any consideration of ground impacts from the FAA's changes. Los Angeles is better than this.

Response P732-3 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 P732-4 *Severe negative impacts for a tourist attraction*

Response P732-4 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 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. 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. 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 P732-5 Given the above, I am all too familiar with what it is like having transportation "progress" added in the airspace that was not there before. Like FAA NextGen at these airports, commercial gain from the aerial gondola (for a private corporation) is being prioritized while ignoring the negative impacts on communities that unfortunately live, work, and go to school below the proposed aerial pathway.

Response P732-5 Refer to Responses P732-4 for a discussion of the proposed Project's potential environmental impacts and P732-10 for a discussion of considerations regarding the surrounding communities. 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 P732-6 These communities will suffer severe negative impacts including loss of privacy (gondolas will be less than 40 feet above homes!) and cluttered airspace ... for a

tourist attraction. A \$120 ride for a family of 4 to Dodger Stadium is not a transportation solution, but merely a gimmick.

Response P732-6 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. The proposed Project would be located in a densely populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Refer to Topical Response J, Gondola Design and Operations, and Section 2.0, Project Description, of the Draft EIR, for discussion of how cabin windows can be equipped with privacy glass that can become opaque while 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. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for discussion of how 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 P732-7 According to a UCLA Mobility Lab study dated October 24, 2022, LA ART would not significantly reduce traffic around Dodger Stadium, will not reduce greenhouse gas emissions, will carry fewer passengers than LA ART claims, will not likely be used after the games, and will unlikely be used for any transportation aside from the games. There are far better ways to meet the objectives through alternatives, including better use of existing bus lanes.

Response P732-7 Refer to Topical Response O, Response to the UCLA Mobility Lab Study, for a discussion of how the Dodger Stadium Express would not be precluded from operating by the proposed Project. While existing riders of the 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. 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 attendees of games or events at Dodger Stadium to ride public transportation. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how 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.

Comment P732-8 *LA ART similar to City's push for AAM/UAM implementation*

Response P732-8 Refer to Response P732-10 for a discussion of the proposed Project's ability to reduce vehicular travel and improve connectivity in surrounding communities.

Comment P732-9 LA ART is strikingly similar to the city's effort to benefit the aviation industry through the rollout of Advanced Air Mobility/Urban Air Mobility ("AAM/UAM") in Los Angeles.

Response P732-9 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. Refer to Response P732-10 for a discussion of the Project Sponsor.

Comment P732-10 Similar to the gondolas, the AAM/UAM "flying taxis" will hold 2-4 people, fly at low altitude (350 ft AGL), serve only high-income users, and will not reduce freeway traffic. AAM/UAM has been pushed forward at breakneck speed behind-the-scenes without any meaningful community engagement or community input. All while the public is left in the dark on what additional burdens are to come, for the sake of private economic benefit, to those under a flight path or a gondola track.

Response P732-10 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 how the proposed Project would carry up to approximately 5,000 passengers per hour per direction (pphpd). 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 travel. Refer to Section 2.0, Project Description, for discussion of how the proposed Project would comply with the American National Standards Institute (ANSI) Standard B77.1 governing aerial clearance. Refer to Topical Response N, Environmental Justice, for discussion of how 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. 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. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of outreach and community engagement during the Draft EIR public review period and community engagement efforts during the preparation of the Final EIR. 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. Refer to Topical Response M, Comparable Urban Aerial Transit Systems, for discussion of comparable aerial transit systems in cities around the world and their operations, integration with nearby residential and open space uses, community benefits, promotion of public art and collaborations with local artists, and evidence that such systems can reduce violent crime in nearby areas and promote a sense of security compared to other modes of public transportation.

Comment P732-11 Please stop ignoring severe human and environmental costs for monetary gain of private corporations. Include citizens in the process and take their concerns to heart.

Response P732-11 Refer to Response 732-4 for a discussion of the proposed Project's environmental impacts. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. For example, after initially offering two options for the proposed Project alignment in the Notice of Preparation, responding to stakeholder input, the Project Sponsor announced it would proceed with the proposed Project alignment studied in the Draft EIR, including the intermediate Chinatown/State Park Station near the southernmost entrance to the Los Angeles State Historic Park. This decision was in direct response to both State Park and Chinatown stakeholders. Located within a short walk to many Chinatown businesses and Metro's L Line (Gold), this station also addresses the goal of creating a stronger connection with the Metro L Line and would also enhance transit access to the Los Angeles State Historic Park, Mission Junction, William Mead Homes, and the Los Angeles River. In addition to this significant modification in response to public input, the proposed Project stations were also redesigned to address public response to the initial design vision for the proposed Project, by reducing the size by 26 percent and updating the architecture to better reflect the neighboring communities. Refer to Section 2.5, Proposed Project Alignment and Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR, for discussion of how the proposed Project maximizes the alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. Refer to Topical Response C, Project Features, for discussion of how the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential

partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents.

Comment P732-12 Most importantly, *stop LA ART and stop AAM/UAM*. Neither is an actual transportation solution, but both are nightmares for communities and natural spaces beneath them.

Response P732-12 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. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. 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. 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 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. Refer to Response P732-4 for discussion of how the proposed Project would have less than significant operational impacts.

Comment Letter P733 – Sara Feldman

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P733

Comment P733-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). I no longer live in Los Angeles, but from 2001 to 2013 I was the Vice President for Programs at the California State Park Foundation. In that capacity, I work tirelessly with California State Parks on the development of this important, groundbreaking, innovative public park. I watched it grow from a brownfield to a cornfield, to a green park filled with stunning views, beautiful trees, historic interpretation and spaces of all sorts for the community to gather and participate in a wide variety of activities.

I write now as a private citizen, but my time at the Foundation afforded me a deep inside into the value of this unique park.

Response P733-1 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. 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.

Comment P733-2 The Gondola Project's enormous towers will cause aesthetic impacts in the community. I am concerned that the towers will obstruct views, and that the gondola cars will be used for advertising and electronic billboards.

Response P733-2 Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the location and design of the Alameda Tower, Alpine Tower, and Stadium Tower. 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's towers, which would be less than significant, and for visual simulations of the proposed Project's towers. The Alameda Tower's modern architectural style is evident and would complement the buildings within The California Endowment. The neutral light-tone gray color scheme of Alameda Tower was designed for consistency with the surrounding urban environment, and to not distract from visually distinct structures such as the United States Post Office Terminal Annex building. Alpine Tower would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and their design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. Stadium Tower would consist of an architectural design that provides visual lightness to the form to complement the existing buildings in this area. In addition, the neutral light-tone gray colors and material finishes of the Stadium Tower were selected to complement the surrounding urban environment, and to not distract from existing visually distinct

structures, such as Dodger Stadium. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. Refer to Topical Response K, Signage and Lighting, for discussion of the proposed Project's signage and lighting, with additional technical detail and information provided in the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR. The proposed Project's Sign Concept Plan included as Appendix B of the Lighting Study provides that across the entire proposed Project, including stations, the junction, towers, and cabins, the proposed Project is proposing static signage and 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. 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 art collaborators. Further, 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 proposed Project's system, including its stations, the junction, towers, and cabins, and would be designed consistent with applicable Metro, City, and State approval requirements.

Comment P733-3 The Gondola Project's displacement of traffic onto the surrounding neighborhoods will worsen air quality impacts from tailpipe emissions in an already overburdened community.

Response P733-3 Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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. 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 the *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations.

Comment P733-4 The Gondola Project's will increase traffic around Chinatown and Union Station. This project is designed to displace heavy traffic from Dodger Stadium and push it onto the surrounding communities.

Response P733-4 Refer to Response P733-3 for discussion of how traffic is not required to be analyzed in the Draft EIR under CEQA.

Comment P733-5 This project will increase the impacts of air pollution from vehicle emissions in an area already overburdened by air emissions.

Response P733-5 Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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. Refer to Topical Response A, SB 44, for discussion of how the proposed Project would reduce emissions by no less than 50,000 metric tons of greenhouse gas emissions directly in the proposed Project's corridor as defined within the EIR over the useful life of the proposed Project, and without using offsets the proposed Project's lifetime VMT reduction 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 SB 44.

Comment P733-6 This project will lead to displacement and increase the cost of rent in the area, and will lead to future commercial development in Chavez Ravine, without community input and without disclosure to the community.

Response P733-6 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how 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. Refer to 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, for a discussion of how the proposed Project solely proposes an aerial gondola system. 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. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process.

Comment P733-7 Metro went forward with this project without an open public process and without competitive bidding. I don't understand the ownership or operation of the project because the details have been hidden.

Response P733-7 This comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. 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 P733-8 Who is paying for this project? Will taxpayers be left holding the bag? This is the absolute opposite of what happened with the development of the park, which involved extensive community consultation and was very transparent.

Response P733-8 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public

outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately after 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. 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.

Comment P733-9 I strongly urge Metro to view this proposal with a very critical eye and remember the community that fought so hard for this park, which has become a symbol of innovation and beauty far beyond just downtown.

Response P733-9 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.

Comment Letter P734 – Echo Park Neighborhood Council

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P734

Comment P734-1 On behalf of the Echo Park Neighborhood Council (EPNC), I would like to submit a comment in response to the Draft Environmental Impact Report (EIR) published by AECOM for LA Metro. The Echo Park Neighborhood Council would like to highlight and echo some concerns already raised by the residents of Echo Park, our neighbors and community partners regarding the environmental and cultural impacts of the proposed project.

Response P734-1 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 P734-2 through P734-8.

Comment P734-2 I. Response to Claim of Reduced Traffic Congestion

LA ART is proposing that the new gondola transit system would help to alleviate the traffic caused by the popular games at Dodger Stadium. While traffic congestion and pedestrian safety is a major concern for local residents, the free bus system from Union Station to the Stadium already offers an alternative to driving to the games. In fact, UCLA published an independent study that claimed the gondola system would actually do little to reduce the traffic congestion in and around the stadium. EPNC is concerned that instead of diverting the 3,000 drivers LA ART claims it will divert in its report, the gondola will instead divert less drivers and actually divert users of the free shuttle system.

Response P734-2 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express 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 Los Angeles Union Station (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. Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. 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. As discussed in Topical Response O, the Dodger Stadium Express would not be precluded from operating by the proposed Project. While existing riders of the 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. 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 attendees of games or events at Dodger Stadium to ride public transportation. Refer to Topical Response C, Project Features, for discussion of how 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 P734-3 Furthermore, LA ART has not discussed any parking plans to accommodate these 3,000 drivers at either of the transit stations at Union Square or Chinatown Gold Line station. EPNC is concerned that with increased traffic and street parking in these areas, pedestrian and cyclist safety will be at risk. LA ART also has not proposed additional safety measures to address this concern.

Response P734-3 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 the Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project’s Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project’s stations..

Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines (“TAG”). Nevertheless, the 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.

Refer to Topical Response C, Project Features, for discussion of 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.

Comment P734-4 EPNC would like to see further studies on this subject and would like LA ART to incorporate more pedestrian + bike friendly additions to the project to truly alleviate

traffic in our neighborhood. LA ART has already suggested building a pedestrian bridge to connect Broadway to LA Historic Park as a part of its contribution to the neighborhood.

Response P734-4 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. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, 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/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. As discussed in Section 5.0, Corrections and Additions, of the Final EIR, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park, the City's second largest park, comprising 575 acres, and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first/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. In addition, the cabins would accommodate bicycles and would be fully ADA accessible.

Comment P734-5 LA ART could also help to install more public escalators and walkways to make walking to the stadium from the LA Historic/Chinatown area more feasible. With the Project in its present form, EPNC is not convinced that there is in fact a significant benefit to our community as it relates to traffic congestion.

Response P734-5 Refer to Response P734-4 for discussion of the pedestrian improvements included as part of the proposed Project. Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which 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. While this alternative would provide improved pedestrian connections compared to existing conditions, the 25 minute plus travel time from the Metro L Line (Gold) Station to the location of the proposed Dodger Stadium Station would be at least nine times greater than the three minute travel time between those two locations with the proposed Project, and this alternative would be unlikely to attract substantially more people to walk to Dodger Stadium compared to existing conditions given the travel time and the physical exertion. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project. 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 Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. 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.

Comment P734-6 II. In Response to Adverse Community Impacts

Our neighbors in Chinatown have raised concerns over noise pollution, privacy and risk of gentrification that would come with the construction of this transit system. Chinatown is already a community that has faced issues of gentrification due to outside investment and subsequent displacement of local residents and businesses. At present, there are no protections for Chinatown residents and legacy businesses that would ensure their survival in the community. EPNC would like to see LA ART do more to ensure the survival of legacy businesses in Chinatown should the project move forward. A suggestion would be to place a Chinatown non-profit as the lease holder for the concession stands planned for the station so that priority can be given

to a local legacy business. Cost to ride the gondola for community members should also be free at all times.

Response P734-6 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. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation. Operational noise impacts would be less than significant. 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. The proposed Project would be located in a densely-populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, Gondola Design and Operations and 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. 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.

Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how 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. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not displace businesses 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. Refer to Topical Response C, Project Features, for discussion of how during construction, 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 through potential partnerships

with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. In addition, refer to Topical Response N, Environmental Justice, for discussion of how the Project Sponsor has committed to a goal of 35 percent utilization of 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 during the proposed Project's construction phase.

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. 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. 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 P734-7 EPNC would also like to echo that LA ART should do more to invest in the local communities that they are crossing into, and make the addition of shade structures, benches, trees and sidewalk improvements a permanent and 100% assured addition to the project and neighborhood in Chinatown. EPNC also supports the addition of the pedestrian walkway from Broadway to LA Historic Park and the placement of bike ride share stations at each transit station.

Response P734-7 Refer to Response P734-4 for discussion of how 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. As discussed in Section 2.0, Project Description, of the Draft EIR, 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/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/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. In addition, the cabins would accommodate bicycles and would be fully ADA accessible.

Comment P734-8 In conclusion, the proposed project in its present form, does not provide a substantial enough benefit to the community or surrounding environment for EPNC to support. LA ART would need to meet all of its suggested improvements and much more in order for the community to feel like it was a positive addition to our neighborhoods.

Response P734-8 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. 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.

Comment P734-9 RESOLUTION

On January 24, 2023, the EPNC Board of Governors held a Brown Act noticed-meeting, at 7pm through zoom. With a quorum of 15 board members present and vote count of 15 yeas, 0 nays, and 0 abstentions, the Board resolved to write a request for action for the application as set forth above.

Response P734-9 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 P734-2 through P734-8.

Comment Letter P735 – Los Angeles Union Station Historical Society (LAUSHS)

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P735**Comment P735-1**

Dear Ms. Wiggins,

Attached are the comments to Mr. Zelmer concerning the LAART "Gondola" project and particularly the meeting hosted by him at Cathedral High School on January 12, 2023. As a result of the meeting, the Los Angeles Union Station's Board of Directors is calling for the reschedule of the meeting because of the complete disarray of the 1/12/23 event and the lack of Disabled Parking which made it unreasonably difficult for people such as myself. We also believe that Mr. Zelmer failed terribly in the execution of his duty hosting the very important and public meeting and request that he be reassigned away from the "Gondola" project.

Response P735-1 This comment provides a general summary of the comments raised in Comments P736-2 through P736-5. Refer to Responses P736-2 through P736-5. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's Draft EIR public review period, including the January 12, 2023, public hearing. Refer to Topical Response N, Environmental Justice, for discussion of how public outreach for the proposed Project was designed with environmental justice principles in mind and provided opportunities for in-person and virtual meetings with toll-free dial in options and ADA accessibility features. Cathedral High School has at least five accessible parking spaces within the school campus, including within on campus parking lots accessible from Bishops Road, North Broadway and Cottage Home Road. The lots that these spaces are in were available to attendees during the January 12, 2023, public hearing.

Comment Letter P736 – Los Angeles Union Station Historical Society (LAUSHS)

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P736

Comment P736-1 I was present at the recent LAART Gondola meeting hosted by you, and/or LA Metro, Frank McCourt, Los Angeles Aerial Rapid Transit, ClimateResolve, Cathedral High School and Does 1 to 10. I attended as the representative of the Los Angeles Union Station Historical Society (LAUSHS). Here are my recollections that in our opinion brings into question the legitimacy of the meeting:

Response P736-1 This comment provides a general introduction to the comments raised in the letter. Responses to the comments contained in this letter are provided below in Responses P736-2 through P736--5.

Comment P736-2 A) Although I arrived at Cathedral High School meeting venue at the beginning of the meeting, I was delayed by thirty minutes getting to the venue because there was no Disabled Parking in or around Cathedral High School. (This has since been confirmed by Cathedral High School staff.) Consequently, I was late because I am a Disabled Person, and since all normal street parking was occupied by residents and/or meeting participants, I was obliged to park on the sidewalk after driving about for nearly 30 minutes, in fear of not representing the views of the LAUSHS. Consequently, I waddled with cane in hand to the distance to the meeting. This, in our opinion, a reasonable person would conclude that Mr. Zelmer and/or other “hosts” do not care about providing reasonable accommodations for Disabled Persons and myself. Furthermore, it indicates to us Mr. Zelmer’s indifference to the Disabled and/or his incompetence in hosting same at the public meeting.

Response P736-2 Refer to Topical Response N, Environmental Justice, for discussion of how public outreach for the proposed Project was designed with environmental justice principles in mind and provided opportunities for in-person and virtual meetings with toll-free dial in options and ADA accessibility features. Cathedral High School has at least five accessible parking spaces within the school campus, including within on campus parking lots accessible from Bishops Road, North Broadway and Cottage Home Road. The lots that these spaces are in were available to attendees during the January 12, 2023, public hearing. Refer to Response P736-3 for discussion of the January 12, 2023, public hearing.

Comment P736-3 B) When I finally entered the meeting, it had the appearance and sound of a near riot. I was told by bystanders that the spontaneous demonstration was because Mr. Zelmer and other hosts refused to take any questions of the 70 to 100 members of the local community in attendance. It is our opinion that a reasonable person might conclude that Mr. Zelmer is incompetent in representing Metro, and LAART in a public forum.

Response P736-3 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project’s opportunities for public testimony during the Draft EIR public review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and during the four public hearings. Comments on the Draft EIR could be submitted by email to LAART@metro.net, by mail to One Gateway Plaza, Mail Stop 99-22-6, Los Angeles, CA 90012, or over the phone by calling (213) 922-6913. Comments could also be submitted at each public hearing. At virtual public hearings, comments could be given verbally. At the two public hearings held in person, comments could be submitted either in writing on forms provided by Metro, or verbally to the court reporters who were set up at a “comment station” in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Interpretation was provided in English, Spanish, Mandarin, and Cantonese during all four public hearings, with interpretation provided in Taishanese during the final two public hearings.

During the January 12, 2023, public hearing at Cathedral High School attendees were provided with the opportunity to submit public comments either in writing on forms provided by Metro, or verbally to the court reporters at a comment station in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). Shortly after the public hearing started, a group of approximately 40 protesters with “Stop the Gondola” signs entered the meeting and began speaking with amplified bullhorns, using profanity. Due to this group’s loud, prolonged protests, the court reporters and interpreters could not take verbal public comment. Metro requested that the protestors turn off their amplifier to enable the agency to continue to take verbal public comment. The protestors then began marching around the room, chanting and continuing to speak into the amplified bullhorns. Approximately 6 to 10 protestors then started to tear down poster boards, knock over easels and tables and throw materials. Metro and AECOM staff, subject matter experts, and the Project team expressed that they were physically intimidated and frightened by the damage done by the protestors, as discussed in greater detail in the February 10, 2023, memo submitted by the Project Sponsor and included as Attachment D to Appendix A, Public Outreach Report, of the Final EIR.⁴³ After the protestors left, Metro staff concluded the meeting by talking to several remaining attendees. An estimated 143 attendees participated in the January 12, 2023, public hearing, and Metro received 31 verbal comments and 95 written comments on the Draft EIR. 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

⁴³ LA Aerial Rapid Transit Technologies LLC. 2023. Memorandum Regarding LA ART Draft EIR Public Hearing No. 3 – Consultant Experiences During Protest.

public hearing were deemed timely submitted for the purposes of the Draft EIR public review period.

Comment P736-4 C) Furthermore, the working press and Community representatives said that they were told to ask Brother John Montgomery, Principal of Cathedral High School for answers to their questions on LAART. Brother John is not to our knowledge a credentialed transit or environmental expert. (All known nonaligned experts and the Sierra Club are against the Gondola.) Brother John then extolled to them via nationwide TV, the reasons he saw for building the Gondola, without mentioning the pertinent fact that his employer, Cathedral High School, gets significant funds from Frank McCourt, an apparent conflict of interest in our opinion.

Response P736-4 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's Draft EIR public review period, including the January 12, 2023, public hearing held along the proposed Project alignment at Cathedral High School. The format of the January 12, 2023, public hearing was an Open House, consistent with standard Metro practice, where attendees could learn more about the proposed Project and the key analyses and conclusions of the Draft EIR, and also a public comment opportunity. Twelve stations were set up throughout the Cathedral High School Gymnasium, with ten stations focused on specific subject matter areas of the Draft EIR. Attendees could walk around to each station and ask questions to subject-matter experts about the proposed Project. Each station had large, printed boards summarizing the subject matter of that station, including: the Project Description, Aesthetics, Air Quality, GHG, and Energy, Cultural (Archaeology and Historical Resources), Parks and Recreation, Noise, Transportation, and Parking. Each station also included printed materials that attendees could review and/or take with them, including fact sheets in English, Spanish, and Chinese (Simplified) and printed copies of the presentation from the virtual public hearing in English, Spanish, Chinese (Simplified) and Chinese (Traditional). A hard copy of the Draft EIR was also available at the Summary of Impacts station for attendees to review. The meeting was staffed by Metro and AECOM staff, experts on subject matter areas including Transportation and Parking; Archaeology; Historical Resources; Air Quality, Greenhouse Gas, and Energy; Ropeway Engineering; Noise; and Aesthetics, and the Project team, who answered questions from attendees on the Draft EIR key analyses and conclusion. Neither Metro nor the Project Sponsor directed attendees to direct questions about the proposed Project to Cathedral High School staff, and meeting staff at the Welcome Table provided attendees with roadmaps for the stations around the gymnasium. Refer to Response P736-3 for discussion of the public comment opportunity at the January 12, 2023, public hearing. 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 P736-5 D) Therefore, the Los Angeles Union Station Historical Society has concluded that given all the above, the legal validity of the meeting was compromised and that a new meeting should be rescheduled with a live democratic give-and-take on the issues, better crowd control and hosted by an uncompromised Metro meeting expert, not Mr. Zelmer who a reasonable person might conclude is compromised by an apparent conflict of interest in that he is a Metro employee in charge of investigating the Gondola project for the public weal whilst his salary is gifted to Metro by the Gondola's chief proponent and benefactor Frank McCourt.

Response P736-5 Refer to Responses P736 2 through P736-4 for discussion of the January 12, 2023, public hearing for the proposed Project's Draft EIR. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of how, 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. Certain attendees who expressed concerns about the proposed Project nonetheless shared positive feedback with Metro for the facilitation of this public hearing, including thanking Metro for the "calm, collected, and objective facilitation of this hearing this evening," "inviting a Toisan interpreter and obliging access needs in the meeting," and "continuing this meeting past the time . . . to hear so many of my neighbors views." An estimated 168 attendees participated in the February 8, 2023, continued public hearing, and Metro received 82 verbal comments on the Draft EIR. 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. As is customary, the Project Sponsor is reimbursing Metro for its time on the proposed Project as the Lead Agency under CEQA.

Comment Letter P737 – Karina Macias

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P737

Comment P737-1 Hope you are doing well. Good to see Metro is hosting this public hearing to continue accepting comments after proceedings at Cathedral High were disrupted.

I am following up in hope that you can help me get more information about this virtual hearing's format. Specifically, what measures will the project team be implementing to ensure that the "continued" public hearing format:

- allows all participants to record their comment(s) and their affiliation (e.g., project area resident, CBO, etc.)
- supports multi-language informational presentation and comment recording, and
- provides interested participants without access to a computer can participate.

Thanks so much in advance for your help!

Response P737-1 In response to this inquiry, Metro responded on February 1, 2023, providing the requested information.⁴⁴ Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's Draft EIR public review period, including the January 12, 2023 public hearing. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. During the January 12, 2023, public hearing at Cathedral High School attendees were provided with the opportunity to submit public comments either in writing on forms provided by Metro, or verbally to the court reporters at a comment station in the venue. Written comment forms provided instructions on how to comment on the Draft EIR in English, Spanish, and Chinese (Simplified). An estimated 143 attendees participated in the January 12, 2023, public hearing, and Metro received 31 verbal comments and 95 written comments on the Draft EIR. 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. Project materials and information were provided on Metro's website in English, Spanish, Chinese (Traditional), and Chinese (Simplified). The continued public hearing offered Spanish, Cantonese, Mandarin, and Taishanese interpretation through Zoom's interpretation function. Public comments made in Spanish, Cantonese, Mandarin, or Taishanese were translated to English, and court reporters

⁴⁴ Email from Cory Zelmer to Holly Rockwell, re: FW: Los Angeles Aerial Rapid Transit – NEW VIRTUAL PUBLIC HEARING 2/8/23 (February 1, 2023).

recorded the English translation. Slides contained identical, side-by-side information in English, Spanish, Chinese (Simplified) and Chinese (Traditional).

Comment Letter P738 – Zab Steenwyk

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P738

Comment P738-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Let me start by saying I am a resident who lives in an apartment building across from LA State Historic Park and one of the reasons we chose the neighborhood was the proximity to public transportation. I take Metrolink trains from Union Station to work, my husband bikes to his work downtown and we've jumped on the Metro lines to get around more than once. We are BIG supporters of more public transportation in the city.

Response P738-1 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. 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 P738-2 So when I saw the Stop the Gondola billboards, I was a little confused. More public transportation? What wasn't to like? It was only after investigating the positive and negative impacts that the gondola was projected to have as reported in the Environmental Impact Report (led by LSCMTA) that I realized the negatives far outweigh the positives.

Response P738-2 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. 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 P738-3 through P738-6.

Comment P738-3 First of all, the budget is exorbitant for an extremely limited service route. As a train user, I've seen Union Station on game days and know that it's not THE main artery that fans are using to get to Chinatown/Echo Park. Rather that budget could be put towards adding additional free game-day shuttles from the neighborhoods surrounding Elysian (like Silver Lake, Los Feliz, Koreatown, Downtown, Lincoln Heights and more) which would allow exponentially more residents safe, sustainable and easy transport to the stadium.

Response P738-3 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which 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 proposed Project. No public sources of funding have been sought or committed to the proposed

Project. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express 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 Los Angeles Union Station (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. The proposed Project would be free to ride for anyone attending a game or event at Dodger Stadium.

Comment P738-4 As a nearby resident, I also know that there are only 81 home games per season - 25% of the year. My husband and I walk in the park nearly every day. The open views and beautiful landscaping and trees are a welcome respite from our otherwise busy city. We love the hill near the entrance where dog owners gather - it makes it feel like a community and fosters interactions between neighbors. Our favorite view is when we turn around at the end of the park and downtown is perfectly framed. The scale of these gondola towers, the proximity of the cabins to the ground, and the eyesore of the building would ruin the solace we and many others find in the park. It's not worth ruining 100% of the days in the park for a few rush hours on the 25% of days where a game is being played.

Response P738-4 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. 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, which 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. 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. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the

proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant. The proposed Project would also enhance the public realm, aesthetic lighting/signage, connections to open space, transit, and community facilities. As such, 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. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including at the Park. 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's towers, which would be less than significant. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. 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. 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. 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.

Comment P738-5 The estimated emissions saved by the gondola are minimal and can not begin to compare to the emissions saved offering free or low-cost shuttles - LARGELY due to the fact most fans would still have to drive to the stations since there will be so few. This neighborhood is already burdened by emissions from being surrounded by highways in all directions. There are real ways to reduce this and I'd like to see our public officials champion those kinds of real changes - not be resistant to public comment like this process has been.

Response P738-5 Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. Refer to Topical Response C, Project Features, for discussion of how 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. 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 at LAUS. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express 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. In addition, 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. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period.

Comment P738-6 Again - I'm a big public transportation fan. But there are infinitely better ways of achieving this than the Gondola and I hope you will explore them instead of burdening this community with a developer's misguided project.

Response P738-6 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. 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. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives pursuant to CEQA. 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.

Comment Letter P739 – Robert Cole

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P739

Comment P739-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium). This project will negatively impact the local community. There has not been any consideration on the local residents in the area. The community does not want this gondola flying over it all day and night. Take the bus!

Response P739-1 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. 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. 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. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team's outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project's features to enhance and provide additional benefits to the surrounding communities. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express 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 Los Angeles Union

Station (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.

Comment Letter P740 – Mara Fisher

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P740

Comment P740-1 I'm writing in support of the Los Angeles Conservancy's comments calling for an environmental review of LA ART led by the City of LA and also in opposing this project.

Please find the Conservancy's full comments here.

Thank you for your time.

Response P740-1 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. Refer to 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, for discussion of how Metro is the proper lead agency for the proposed Project because Metro has primary responsibility for implementation of the proposed Project as the region's transportation authority. Refer to Appendix A, Scoping Report, of the Draft EIR, and Appendix A, Public Outreach Report, of the Final EIR, for documentation of notice to responsible agencies at various stages in the environmental review process. Metro has complied, and will continue to comply, with the CEQA requirements for consultation with responsible agencies at each stage of the environmental review process. This consultation process has included meetings with Metro and the responsible agencies to discuss the scope of environmental review, additional consultation with the City as Draft EIR preparers, and comments from responsible agencies on the Draft EIR. This consultation process will continue throughout the course of the environmental review process. Refer to Response GO16 for responses to the Los Angeles Conservancy's comment letter referenced in this comment..

Comment Letter P741 – Sara Clendening

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P741

Comment P741-1 Hi! I don't know if this is the right phone number, but my name is Sara Clendening, President of Lincoln Heights Neighborhood Council, speaking as an individual in reference to the Gondola project. And I guess this will be my public comment for the record, and that our community, Lincoln Heights, is opposed to the Gondola, as is the historic community of Dogtown, and Solano, and Chinatown. The public private partnership on, you know, public property, that was given away to a corporation—which, that issue was never... we've never seen justice from that—with the three communities of La Loma, Palo Verde and Bishop, getting their land taken, right? Dodgers shouldn't, shouldn't... you know, we can't move forward with the Gondola until, like, that has been dealt with, right? Like, in the terms of, like, land back or reparations, and justice for our community. Now, the Gondola thing. Yeah, no. It can't go anywhere. Taxpayer money should not be going to benefit an evil corporation that, you know, basically destroyed a mountainside with the help of this city, and eradicated the communities. And that is that. And we are absolutely opposed to this Gondola.

Response P741-1 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. Refer to Section 5.0, Corrections and Additions, of this Final EIR for a discussion of Chavez Ravine. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project. 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. 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. 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 P741-2 Although, we do appreciate the EIR that metro did with the archeological stuff. Good work on that.

Response P741-2 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 P741-3 But yeah, there's no way that you guys should be working with the Dodgers on this. Right. Bye.

Response P741-3 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. 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 Letter P742 – Dennis Rohatyn

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P742

Comment P742-1 Hey, hello my name is Dennis Rohatyn. I'm interested in the aerial rapid transit project, the so-called Gondola, and I plan to attend the Zoom meeting in a few days. And I'm looking over the report, and the only thing I don't see is the height at which the Gondola is going to fly, or the arch, the trajectory, and what the maximum height will be. Nothing in the description tells me that. I'm wondering if you know that, or can refer me to someone who does, or if there is a diagram or something of that sort that will let me know what that altitude will be for some, if not most, of the 7-minute flight. My name again is Dennis Rohatyn, R-O-H-A-T-Y-N. My number is 619-318-5373. 619-318-5373, and if it's more convenient, you can always send me an email at "drohatyn", D-R-O-H-A-T-Y-N, at cloud dot com [d.rohatyn@cloud.com]. Thank you so much for your time and help! Bye, bye.

Response P742-1 Refer to Section 2.0, Project Description, of the Draft EIR for discussion of the proposed Project components size and height, including Table 2-2: Proposed Project Station and Junction Details and Table 2-3: Proposed Project Tower Details, which provide information regarding the size and height of the proposed Project stations, junction, and towers. Refer to Section 2.0, Project Description, of the Draft EIR for discussion of how the Proposed Alignment Plan and Profile (Appendix Q) includes additional detail as to proposed Project alignment and profile. Refer to Appendix Q, Proposed Alignment Plan and Profile, which includes the proposed Project profile. Refer to Section 2.0, Project Description, of the Draft EIR for discussion of how the proposed Project would meet and anticipates exceeding the American National Standards Institute (ANSI) B77.1 requirements for vertical clearances.

Comment Letter P743 – Douglas P. Carstens, The California Endowment (TCE)

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P743

Comment P743-1 On behalf of The California Endowment (“TCE”) and pursuant to the continuation of public comment through the February 8, 2023 public hearing scheduled by Metro, on the Draft Environmental Impact Report (“DEIR”) prepared for the Gondola project (“Project”) proposed by Los Angeles Aerial Rapid Transit (“ARTT”), we respectfully submit the attached material and supplemental comments as our written testimony for this public hearing.

Response P743-1 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 P743-2 through P743-9.

Comment P743-2 This material underscores the feasibility and reasonableness of choosing the environmentally superior, no-emission alternative, with electric buses operated by Metro. The DEIR claims the Transportation System Management (“TSM”) alternative “would generate new emissions as there would be additional Union Station DSE (Dodger Stadium Express) bus service on the existing route.” (DEIR, p. 4-65.) However, if the DSE buses were all electric, there would be no emissions at all- zero emissions.

Response P743-2 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express 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 Los Angeles Union Station (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. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express.

Comment P743-3 The DEIR fails to mention that Metro has received a \$104 million grant for zero emission electric buses as was reported on August 19, 2022 (Enclosure 1) and has committed to having an all-electric bus fleet by 2030 (Enclosure 4). Therefore, claiming the TSM alternative would increase emissions is misleading and fails to present Metro’s own plan for zero-emission buses.

Response P743-3 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how 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. 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 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. Refer also to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express 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.

Comment P743-4 This is a substantial and fatal flaw in the current DEIR analysis. It falsely portrays Mr. McCourt's Gondola Project as superior to a low- or no-emission option. Such conclusion in the DEIR is not supported by substantial evidence and creates an erroneous comparison to zero-emission buses. The DEIR should be re-written and recirculated as required by law to provide an accurate and thorough analysis based on substantial evidence of the TSM Alternative.

Response P743-4 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. 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 Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. 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 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 travelled. The proposed Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles travelled. Refer to Response P743-3 for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives, and how electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. This comment and the comments raised in this letter do not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment P743-5 Additionally, construction of towers on Alameda Street on public land for Mr. McCourt's private project will be problematic when those parcels are better used for public-serving purposes such as affordable housing with supportive tenant services. Prior to the publication of the DEIR, the City, which is a responsible agency, designated these parcels for desperately needed housing and entered into negotiations to allow for the construction of affordable residential units to house vulnerable populations.¹ The DEIR fails to inform the public of this conflict with City of Los Angeles policies and plans and fails analyze how this impact is to be mitigated.

Footnote 1: The City of Los Angeles' Chief Administrative Officer's Comment letter dated January 17, 2023 stated "The plan for these sites includes D 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 P743-5 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing. As discussed in Topical Response E, the proposed Alpine Tower is sited on 901 North Main Street and the Homeboy Industries' anticipated housing project is located on 903 North Main Street. 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. The proposed Alpine Tower is located on a triangular portion of 901 North Main Street between the Metro L 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. 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. Further, as discussed in Topical Response E, the proposed development Project at 903 North Main Street was considered a related project in the Draft EIR and, 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 Draft EIR fully analyzed the potential environmental impacts of placing the Alpine Tower in this location, recognizing the anticipated Homeboy Project as a related project under Section 5.0, Other CEQA Considerations, of the Draft EIR, and as a sensitive receptor for the purposes of the Draft EIR's Air Quality and Noise and Vibration analysis, presented in Sections 3.03 and 3.13, respectively. No further action is required. Further, as discussed in Topical Response E, the proposed Project's Alameda Tower would not impede The California Endowment's potential use of the Alameda Triangle for recreational spaces, nor would the proposed Project impede The California Endowment's anticipated housing, community and health services, or recreational spaces. Refer to Responses L2-1 through L2-3 for responses to the City of Los Angeles' Chief Administrative Officer's comment letter referenced in Footnote 1 to this comment.

Comment P743-6 While the DEIR discusses Option B- a design option (not an alternative) which would eliminate the Alpine Tower but require the Alameda Tower to be taller, it states Option B has "potential technical constraints due to the taller tower that approaches the limits of technical feasibility due to increase angle of bend at the Alameda Tower." (DEIR, p. 6-20.) In other words- a fair inference from this is that a taller version of the Alameda tower approaches the limits of safety- and so would be even less safe than the current design. The DEIR does not explain what "the limits of technical feasibility" are or what it means that a taller tower "approaches" those limits. What are these limits, and what does it mean for the taller tower to approach them? What impact may this likely riskier option have on the communities below the tower?

Response P743-6 This comment provides a general recitation and characterization of text from the Draft EIR. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the proposed Project alignment as the preferred alignment because it best accommodates various technical and design objectives and considerations. Technical considerations of tower locations included optimizing the height of the towers, minimizing the number of towers, and limiting the bend on the towers to less than two degrees. As discussed in Section 6.0, Design and Use Options, with clarifying revisions provided in Section 5.0, Corrections and Additions, to this Final EIR, the Alameda Tower under Design Option B would potentially result in additional technical considerations due to the increased angle of bend at the Alameda Tower compared

to the proposed Project. The Draft EIR's reference to the "limits of technical feasibility" pertained to the more limited number of comparable aerial transit systems with similar bends to Design Option B, not due to the height of the tower or safety considerations. Refer to Appendix F, Memo on Structural Engineering, of the Final EIR, for discussion of the structural design of the proposed Project's towers. As discussed therein, the towers 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, including all impacts from the height and tilt of the structures, to ensure structural integrity and safety." The Alameda Tower under Design Option B would be required to 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, including all impacts from the height and tilt of the structures, to ensure structural integrity and safety.

Comment P743-7 CEQA mandates disclosure of this technical evidence and is necessary to allow for informed public participation regarding the merits of the project and its alternatives. As the attached correspondence from the City indicates, the construction of the Alpine Tower is infeasible and should never have been considered given the timing of negotiations that precede the publication of the DEIR. (See Enclosure 5.) Option A was never a viable approach to construction and other options should have been analyzed instead.

Response P743-7 Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of the location and design of the Alameda Tower, Alpine Tower, and Stadium Tower. Refer to Appendix F, Memo on Structural Engineering, of the Final EIR, for discussion of the structural design of the proposed Project's towers. As discussed therein, the towers 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, including all impacts from the height and tilt of the structures, to ensure structural integrity and safety." Refer to Section 6.0, Design and Use Options, of the Draft EIR, for discussion of Design Option A. Refer to Response P743-5 for a discussion of the Alpine Tower's siting and responses to the City of Los Angeles' Chief Administrative Officer's comment letter provided in Enclosure 5 to this comment letter.

Comment P743-8 Furthermore, a single tower design is both a visual blight and a structural danger given the weight involved and the fact that it crosses two points of a Metro railway line. In the event of an earthquake, as Southern California is prone to and as the recent very large one in the Turkey-Syria border region demonstrates, there is a risk that the entire structure could collapse leading to mass casualty and destruction. (See <https://www.latimes.com/california/story/2023-02-06/earthquake-like-turkeys->

[would-devastate-southern-california.](#)) Who will be responsible for addressing and mitigating this risk?

Response P743-8 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's towers, which would be less than significant, and for visual simulations of the proposed Project's towers. The Alameda Tower's modern architectural style is evident and would complement the buildings within The California Endowment. The neutral light-tone gray color scheme of Alameda Tower was designed for consistency with the surrounding urban environment, and to not distract from visually distinct structures such as the United States Post Office Terminal Annex building. Alpine Tower would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form and their design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. Stadium Tower would consist of an architectural design that provides visual lightness to the form to complement the existing buildings in this area. In addition, the neutral light-tone gray colors and material finishes of the Stadium Tower were selected to complement the surrounding urban environment, and to not distract from existing visually distinct structures, such as Dodger Stadium. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. Refer to Section 3.07, Geology and Soils, of the Draft EIR, for discussion of how the proposed Project would have less than significant impacts related to geology and soils, including seismic ground shaking, upon implementation of Mitigation Measure GEO-A. Refer to Appendix F, Memo on Structural Engineering, of the Final EIR, for discussion of the structural design of the proposed Project's towers. As discussed therein, the towers 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, including all impacts from the height and tilt of the structures, to ensure structural integrity and safety."

Comment P743-9 The many failures presented above render the DEIR inadequate and indefensible. It cannot be presented for consideration by the Metro Board. At minimum, the entire process should be corrected, the appropriate lead agency identified, a thorough and not misleading analysis of the Project and its impacts provided, and the entire process started over with a sufficiently informative DEIR. Thank you for your consideration of these materials in support of our public testimony.

Response P743-9 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 P743-1 through P743-8. CEQA does not require extensive detail beyond that needed for evaluation and review of the proposed Project's environmental

impact. (See, e.g., CEQA Guidelines § 15124.) The Draft EIR provided sufficient information in order for the public and decision makers to meaningfully evaluate the proposed Project's potential environmental impacts. CEQA does not require "a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" and lead agencies are not required to "provide all information requested by reviewers." (Id., § 15204.) Refer to 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, for discussion of how Metro is the proper lead agency for the proposed Project because Metro has primary responsibility for implementation of the proposed Project as the region's transportation authority. This comment and the comments raised in this letter do not raise any significant new information requiring recirculation of the Draft EIR prior to certification pursuant to CEQA Guidelines section 15088.5.

Comment Letter P744 – Los Angeles Union Station Historical Society (LAUSHS)

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P744

Comment P744-1 Given today's loom meeting for comments concerning LAART's "Gondola" DEIR the Board of Directors of the Los Angeles Union Station Historical Society (LAUSHS Board) has directed me to send the followings additional and updated comments opposing the LAART "Gondola" DEIR.

Response P744-1 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 P744-2 through P744-15.

Comment P744-2 The LAUSHS Board opposes the "Frank McCourt/LAART /Climate Resolve Gondola" (LAART) private, for profit cable car and real estate development scheme that proposes to link Union Station and Metro's supporting "Esplanade-Forecourt-Fountain" project with Dodger Stadium, because it is contrary to Metro's public duty being a unique special favor for LAART.

Response P744-2 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. This comment also raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of Metro's LAUS Forecourt and Esplanade Improvements Project, which is not part of the proposed Project. The proposed Project does not include a water fountain in the planned LAUS Forecourt.

Comment P744-3 Our Board believes that LAART's proposed futuristic/carnival-like Union Station Alameda Street Terminal and Metro's supporting "Esplanade-Forecourt-Fountain" project will blight the viewscape of the historic and architecturally significant West Facade of Union Station and the greenscape and skyscape of Los Angeles State Historic Park.

Response P744-3 Refer to Section 3.05, Cultural Resources, and Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR), of the Draft EIR for a discussion outlining the proposed Project's potential construction and operational impacts to the Los Angeles Union Station Passenger Terminal and Grounds. While the proposed Project's Alameda Station would be a visible change to the overall setting of the historical resource, as discussed on page 16 of Appendix G,

integrity of setting principally refers to the physical features within the boundary of a property but may also include the larger surroundings. However, in urban areas such as Los Angeles, the broad setting has often been changed by development that postdates the period of significance for the subject property. Thus, changes to the surrounding area (i.e., addition of the proposed Project) should only factor into the assessment of integrity if the broad setting is essential to the understanding of the property. As discussed on pages 3.5-49 and 3.5-50 of the Draft EIR, the Los Angeles Union Station Passenger Terminal and Grounds is designated for its architectural and historical significance, and the changes to the resource's setting resulting from the addition of Alameda Station would not impact its architectural significance or its ability to convey this significance. Specifically, as indicated on page 3.5-44, in Section 3.5, Cultural Resources, construction impacts will not alter the physical integrity or character-defining features of the historical resource. Also, as indicated on page 3.5-49, operational features that will have a direct impact on the property and will not alter the physical integrity or character-defining features of the historical resource. Further, visual alterations to the overall setting of the property will be insignificant due to prior substantial alterations to the existing setting and will not impact the significance of the historical resource nor its ability to convey its significance. Overall, construction and operational impacts associated with the proposed Project will not cause a "substantial adverse change" to the significance of this historical resource and, therefore, impacts will be less than significant.

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, which would be less than significant. Refer to Appendix H.1, Memo Regarding Preparation of KOPs, of the Final EIR, for discussion of the methodology used to prepare the visual simulations included in Appendix C, Visual Impact Assessment, of the Draft EIR. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. As discussed in Section 3.01, Aesthetics, of the Draft EIR, 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 would also 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 extend view corridors between the proposed Alameda Station and existing development in a way that creates an observed visual

unity. Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of Metro's LAUS Forecourt and Esplanade Improvements Project, which is not part of the proposed Project. The proposed Project does not include a water fountain in the planned LAUS Forecourt.

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.

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, which would be less than significant, including at the Park. Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact. 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. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant.

Comment P744-4 Moreover, Union Station, its trains and patrons could be physically harmed if aircraft from the nearby Los Angeles Police Department's "Hooper Memorial Heliport" airport were to be entangled in LAART's overhead cables and 13+ story support towers.

Response P744-4 The Draft EIR addresses potential airport hazards in Section 3.09 Hazards and Hazardous Materials, Section 5.5.5, Heliports, in Section 5.0, Other CEQA Considerations, and in Appendix O, Airspace Analysis Technical Memo. Refer to Response P744-8 for further discussion of Stephen Hooper Heliport.

Comment P744-5 Furthermore, the LAUSHS Board opposes Metro's planned removal of all "Disabled Parking" from the "Esplanade-Forecourt-Fountain" area, without public hearings and reasonable alternatives, to accommodate a new, large "water feature" (a misting water fountain) which would cool LAART patrons cued-up for their cable car rides to Dodger Stadium. The water fountain would be contrary to the state's water conservation policy especially during Los Angeles current and likely permanent, record-breaking draught. (Even if the water feature recirculates, at least 10% of its water will be lost to evaporation day after day, year after year.)

Response P744-5 Refer to Section 2.0, Project Description, for discussion of Metro's LAUS Forecourt and Esplanade Improvements Project, which is not part of the proposed Project. The proposed Project does not remove disabled parking or include a water fountain in the planned LAUS Forecourt, and does not include a water fountain in the planned LAUS Forecourt.

Comment P744-6 The LAUSHS Board had originally chosen not to take sides in the above controversial, billion-dollar real estate development scheme. However, in view of Metro's obvious pro-active role supporting LAART, a potential competitor of its efficient "Dodger Stadium Express" motor coach service, as well as planning to "gild the lily" of Union Station with its Esplanade-Forecourt-Fountain Project, done "backstage," using Metro's without first consulting the public, LAUSHS Board had no choice but to take a firm stand against the various Gondola schemes.

Response P744-6 Refer to 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 for a discussion of how the proposed Project solely proposes an aerial gondola system. 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. Refer to Topical Response O, Response to the UCLA Mobility Lab Study, for a discussion of how the Dodger Stadium Express would not be precluded from operating by the proposed Project. While existing riders of the 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.

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 attendees of games or events at Dodger Stadium to ride public transportation. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, and Section 4.0, Alternatives, of the Draft EIR, for a discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express 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. 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 travelling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. While some riders of the Dodger Stadium Express are likely motivated by travelling in more sustainable ways than driving, the Dodger Stadium Express already uses clean natural gas (CNG) buses, which are more environmentally friendly than driving. Switching from CNG to a Zero Emissions Bus (ZEB) would have no bearing on the travel time or capacity limitations of the Dodger Stadium Express, so is not expected to materially increase the ridership of the service, and therefore would reduce fewer vehicle miles travelled (VMT) to Dodger Stadium than the proposed Project, which 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. Refer to Response P744-2 for discussion of Metro's LAUS Forecourt and Esplanade Improvements Project, which is not part of the proposed Project. This comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project.

Comment P744-7 Among the reasons for The Board's opposition are, but not limited to:

A) Former Metro Board member, then Mayor of Los Angeles Eric Garcetti, who originally introduced the motion for Metro to assist LAART without public participation and to enlist Metro staff to "carry LAART's water" as it were, did receive, according to public records, millions of dollars in both political cash contributions and "behest" contributions from billionaire real estate and LAART developer Frank McCourt, his family and various entities which in the LAUSHS Board's opinion, is an unacceptable conflict of interest.

Response P744-7 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. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The public input during this period led directly to changes to the proposed Project to incorporate public feedback, including changes to the proposed Project alignment to include the intermediate Chinatown/State Park Station, redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of outreach and community engagement during the Draft EIR public review period and community engagement efforts during the preparation of the Final EIR.

Comment P744-8 B) In LAUSHS Board's opinion, Metro Deputy Executive Officer Cory Zelmer and/or subordinates and consultants (Zelmer, etc.) falsified an official environmental document--LAART's Draft Environmental Impact Report (DEIR)—by checking-off the DEIR box that states there is no airport within 2 miles (3520 yards) of LAART's proposed Union Station Terminal, when he had been informed repeatedly to the contrary by the LAUSHS Board. Moreover, The LAUSHS Board presented proof to Zelmer, etc. and Metro CEO Stephanie Wiggins, that the Los Angeles Police Department's "Hooper Memorial Heliport" (described as the world's busiest airport for rotary-winged aircraft (aka helicopters) is only 1/2 mile (880 yards) from LAART's proposed Union Station Terminal. Furthermore, The Board reminded Zelmer, etc. that according to the Los Angeles Police Department, the California Department of Transportation, the California Public Utilities Commission, the Federal Aviation Administration, and the 8th U.S. Circuit Court of Appeals, all heliports are airports officially defined as any location where flying machines are serviced. The fact that some airports serve only rotary-winged aircraft (helicopters) while others serve fixed-wing aircraft (conventional aircraft) does not change the fact that all heliports are airports in the eyes of all governing agencies and the Federal Courts. Furthermore, the argument presented by Metro that Hooper Heliport is a police facility, not a civilian facility, and therefore not subject to LAART's DEIR, is illogical and fallacious. It stands to reason that a helicopter that becomes entangled in LAART's cables, gondolas, and 13+story support towers and consequently crashes into Union Station, its trains, and patrons, could cause catastrophic harm regardless had that aircraft

launched from a police facility or a public facility. Simply put, LAART's proposed location is not safe for the Union Station community and helicopters from Hooper Memorial Heliport airport. Please note, the Rules and Regulations of Los Angeles Union Passenger Terminal (LAUS's former name) has for decades stated: "General Notice A. Safety is of the first importance in the discharge of duty."

Response P744-8 The Draft EIR addresses potential airport hazards in Section 3.09 Hazards and Hazardous Materials, Section 5.5.5, Heliports, in Section 5.0, Other CEQA Considerations, and in Appendix O, Airspace Analysis Technical Memo. The determination on page 3.9-30 of the Draft EIR – that the proposed Project alignment is not in an area covered by an airport land use plan nor located within two miles of a “public airport” – is based on facts and the specific language of CEQA’s thresholds of significance for this issue. This threshold is stated in the Draft EIR under Impact HAZ-5, which asks the question: “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 use airport, would the project result in a safety hazard...?” The Draft EIR concludes that the proposed Project alignment is not within two miles of a “public use airport” as that term is defined under CEQA. Regardless of any distinction between heliports and airports, the Draft EIR immediately follows this conclusion with a clear disclosure that the city-owned Jay Stephen Hooper Heliport is within 0.38 miles of the proposed Project. According to the LAPD and AirNav.com¹, the Hooper Heliport is a city-owned, private use facility. As a private use facility, it does not meet the “public use airport” description in the CEQA threshold. Note that the determination is based on the distinction between public and private facilities, not the definition of “airport.” Thus, comparison to federal or state case law or regulations relying on a different definition of “airport” is irrelevant to the analysis required by CEQA. The analysis in Appendix O, Airspace Analysis Technical Memo, of the Draft EIR, is based on FAA analysis standards, concludes with substantial evidence that construction and operation of the proposed Project is clear of the airspace associated with the existing heliports, including the Hooper Heliport, in the proposed Project's vicinity. As such, no adverse effects related to aeronautical hazards are predicted based on these findings, and no notification is required for the proposed Project construction unless the FAA makes a specific request to the Project Sponsor. In addition, refer to Appendix I, Firefighting Helicopter Response Memo, of this Final EIR, for discussion of how helicopter flight paths would not be impeded as a result of the proposed Project.

Comment P744-9 C) Contrary to the promises made to the LAUSHS Board by CEO Stephanie Wiggins, Zelmer, etc. and LAART, no meeting has ever been organized between them and the LAUSHS Board to discuss the difference of opinions concerning the nature of LAPD's Hooper Memorial Heliport airport and the proposed location for LAART's Union Station Terminal. In fact, Metro forbade The LAUSHS Board's examination of the only known 3-D scale model of Union Station's location because of, in LAUSHS Board's opinion, a deliberate subterfuge that the model is dated and furthermore the sharing of the model with the LAUSHS Board would unexplainably be a conflict of interest.

This "shadow play," the LAUSHS Board believes was performed by LA Metro and LAART to obfuscate the issues and delay criticism of LAART. Finally, in December 2022 Metro provided to the general public an aerial diagram of LAART's Union Station Terminal that would be in the worst possible viewscape location--the front of Union Station's historic Hispanic-style West Facade!

Response P744-9 Refer to Response P744-8 for a detailed discussion of Hooper Heliport. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. 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, which would be less than significant. Refer to Appendix H.1, Memo Regarding Preparation of KOPs, of the Final EIR, for discussion of the methodology used to prepare the visual simulations included in Appendix C, Visual Impact Assessment, of the Draft EIR. Refer to Topical Response C, Project Features, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area. As discussed in Section 3.01, Aesthetics, of the Draft EIR, 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 would also 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 extend view corridors between the proposed Alameda Station and existing development in a way that creates an observed visual unity.

Comment P744-10 D) In LAUSHS Board's opinion, LAART is designed to compete with Metro's "Dodger Stadium Express," a highly efficient motor coach service that could be environmentally improved if Metro upgraded to modern, environmentally friendly, "green" electric buses that it might funded by using a portion of the \$20,000,000 in Federal funds ear-marked for the Esplanade-Forecourt-Fountain project.

Response P744-10 Refer to Response P744-6 for discussion of how the Dodger Stadium Express would not be precluded from operating by the proposed Project and for discussion regarding the Transportation Systems Management Alternative.

Comment P744-11 E) Additionally, given the seasonal nature of baseball, it is also LAUSHS Board's opinion that LAART is a "Trojan Horse" scheme to facilitate year-around, for-profit retail and real estate development on McCourt controlled Dodger Stadium parking lots and in the adjacent community which would then be subject to "gentrification" forcing the expulsion of working "ethnic minority" families not able to afford dramatically increased rents.

Response P744-11 Refer to Section 2.1, 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. Refer to 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, for discussion of how the proposed Project solely proposes an aerial gondola system. 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. 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. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how 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. Refer to Topical Response N: Environmental Justice for a discussion of how the Draft EIR fully analyzed and disclosed the proposed Project's potential environmental effects, including on the surrounding communities. Specifically, 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.

Comment P744-12 F) Metro's proposed Esplanade-Forecourt-Fountain project, according to Metro employees--who wish to remain anonymous--will be funded by so-called "overlap money" that was "peeled-off" from Metro's defunct LINK-US project that itself was rejected by the LAUSHS Board's and the public's opposition. Moreover, Metro has stated to LAUSHS's Executive Director, via telephone, that ultimately the Esplanade-Forecourt-Fountain project will come to fruition by a two-step process. First, all public

parking including "disabled parking" would be "temporarily" closed in front of Union Station for construction vehicles without public discussion or participation and Step two-well there really won't be a step two because the parking simply will disappear permanently when the construction vehicles depart. The LAUSHS Board believes this conspiracy would be a violation of the Americans with Disabilities Act (ADA). (A disabled motorist has already filed a formal complaint to the Federal authorities against Metro's Esplanade-Forecourt-Fountain project.) Not only would this negatively impact the "disabled" but also the customers of Metro's tenants the Homebound Restaurant and Brewery, TRAXX restaurant and the numerous social and artistic events that take place in the adjacent former "Ticketing Hall." Furthermore, according to a retired Metro staff person, the Esplanade's water fountain will likely attract "homeless" citizens seeking "showers" contrary to Metro's official policy of not catering to the needs of the "homeless." In LAUSHS Board's opinion, Metro's Esplanade-Forecourt-Fountain project is primarily designed to cool future LAART and adjacent Olvera Street tourist attraction visitors during the hot baseball season. (Note: while Olvera Street's right-of-way and some of its structures and art works are historic, the "Olvera Street tourist attraction" per se was invented in 1930 by a real estate development team who went on to develop Los Angeles' "New Chinatown tourist attraction." Ironically, Old Chinatown was demolished in a racist bid to rid Los Angeles of the Chinese who settled there after building the railroad to Los Angeles, then Union Station was built on top of Old Chinatown's rubble.)

Response P744-12 Refer to Section 2.0, Project Description, of the Draft EIR, for discussion of Metro's LAUS Forecourt and Esplanade Improvements Project, which is not part of the proposed Project. The proposed Project does not include a water fountain in the planned LAUS Forecourt.

Comment P744-13 G) Building the Esplanade-Forecourt-Fountain project's water-feature while semi-desert Los Angeles is experiencing its worst drought yet flies in the face of the State of California's policy to conserve water now and the foreseeable future. One only needs to recall the classic Los Angeles-based movie "Chinatown" to understand what LAUSHS Board believes is driving LAART and Metro's Esplanade-Forecourt-Fountain schemes-the insatiable greed of billionaire land developers, Metro bureaucratic careerists and Metro's elected officials seeking evermore political contributions!

Response P744-13 Refer to Response P744-12 for discussion of how the proposed Project does not include a water foundation the planned LAUS Forecourt. As described in Section 2.0, Project Description, of the Draft EIR, page 2-49, the proposed Project includes several sustainability and water efficiency measures, including drought tolerant landscaping and use of reclaimed water for irrigation where available.

Comment P744-14 H) Finally, the proposed route of Frank McCourt's "Gondola" has it trampling the edges of Los Angeles State Historic Park that was reserved in perpetuity for the public's enjoyment of the open landscape and skyline that once was a hallmark of

Los Angeles. Consequently, one is forced to ask what part of "in perpetuity" does Frank McCourt and Metro not understand?

Response P744-14 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. 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. Refer to Section 3.11, Land Use and Planning, of the Draft EIR, for a discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan. As discussed therein, State Parks has determined that the proposed Project would be inconsistent with the Los Angeles State Historic Park 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. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority related to the proposed Project. Refer to Topical Response F: Los Angeles State Historic Park, for a discussion of the Los Angeles State Historic Park General Plan Amendment. Refer to Response P744-3 for discussion of how the aesthetic impacts of the proposed Project would be less than significant, including at the Los Angeles State Historic Park.

Comment P744-15 For the above reasons, but not necessarily only because of them, the Board of Directors of the Los Angeles Union Station Historical Society has joined: The Sierra Club, the UCLA Mobility Lab, the LA Parks Alliance, the Aliso Street Historical Society and local community organizations plus others who oppose Frank McCourt's "greenwashing" Gondola scheme.

Response P744-15 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. Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. 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. Refer to Comments GO12 (Sierra Club) and GO8 and GO14 (LA Parks Alliance) for responses to comments to those commenters. 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 Letter P745 – Sunjana Supekar, The California Endowment (TCE)

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P745

Comment P745-1 I intend to provide the following comments this evening during the LA Metro Gondola hearing, however, I am concerned that I will not be called on to speak before the 7pm end time. Thus, I would like to submit the following comments.

Good Evening, I am Sunjana Supekar of Chatten-Brown, Carstens and Minter and on behalf of The California Endowment we wish to express our strong opposition to this unsolicited private tourist attraction representing itself as public transportation. We oppose this project because the community did not ask for it and does not want it—the community wants real public transportation solutions.

Response P745-1 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. Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Topical Response N, Environmental Justice, Appendix A, Public Outreach Report, of the Final EIR, Appendix A, Scoping Report, of the Draft EIR, and Topical Response C, Project Features, for discussion of the proposed Project team’s outreach efforts to neighborhoods along the proposed Project alignment and the proposed Project’s features to enhance and provide additional benefits to the surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Metro sought to engage with stakeholders in neighborhoods along the proposed Project alignment in each stage of the environmental review process. Input from the public, including local community stakeholders, led directly to the selection of the proposed Project alignment, including an intermediate station in Chinatown (the Chinatown/State Park Station), as well as to the redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. This commenter provided verbal public comment during the public hearing referenced in this comment, in Comment PH218.

Comment P745-2 - The project will not reduce, but actually displace traffic, noise, and pollution from Dodger stadium to already impacted communities in and around Chinatown, disrupting businesses and services and accelerating gentrification.

Response P745-2 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 the Los Angeles Aerial Rapid Transit Project Non-CEQA

Transportation Assessment, which found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft and recommended the proposed Project work with Metro to identify a transit partnership for the proposed Project riders to further encourage them to take transit, walk, or bike to the proposed Project's stations. 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 Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. 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 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 travelled. The proposed Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles travelled. 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. As detailed therein, construction related noise impacts would be significant and unavoidable even with implementation of mitigation. Operational noise impacts would be less than significant. 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, discussing the proposed Project's potential partnerships with and benefits to local businesses in Chinatown. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, the proposed Project creates a first/last mile transit link for residents and businesses within Chinatown 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 Chinatown and other businesses along the proposed Project alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how 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.

Comment P745-3 - This private Gondola project will require the use of public land, air space and likely, public resources, to be able to operate.

Response P745-3 Refer to Section 2.5, Proposed Project Alignment and Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR, for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P745-4 - Finally, a superior, no emission, public transportation option already exists by using electric buses to expand the already effective free Dodger Express bus to Dodger stadium.

Response P745-4 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options and Section 4.0, Alternatives, of the Draft EIR, for a discussion of the Draft EIR’s consideration of a range of reasonable alternatives, properly identifying an “environmentally superior” alternative and analyzing a “No Project” alternative, pursuant to CEQA. The Transportation Systems Management Alternative for an enhanced Dodger Stadium Express 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. Further, electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger

Stadium Express. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game.

Comment P745-5 The Draft EIR presents misleading and incomplete analysis to the detriment of the public who instead of getting information are given an infomercial. We submitted two letters detailing the DEIR's deficiencies, and we urge Metro and its staff to carefully review and consider the points raised in those letters. We are also concerned because the proposed Alameda and Alpine towers are located in an earthquake liquefaction zone.

Response P745-5 Refer to Responses GO17 and PH17 for responses to the letters referred to in this comment. Refer to Section 3.07, Geology and Soils, and Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR, and Appendix F, Memo on Structural Engineering, of the Final EIR, for discussion of how the proposed Project would have less than significant impacts related to geology and soils, including liquefaction, upon implementation of Mitigation Measure GEO-A.

Comment P745-6 We close by highlighting the numerous other public comment letters from groups, individuals, and public agencies expressing concern about the Project- or opposition to it. These groups include:

Homeboy Industries

Gabrieleno/Tongva San Gabriel Band of Mission Indians.

El Pueblo Park Association

Los Angeles Parks Alliance

California State Park Rangers Association

Natural Resources Defense Council

Sierra Club

Los Angeles Union Station Historical Society

Stop the Gondola, including but not limited to Phyllis Ling

Los Angeles River State Park Partners

Coalition for a Beautiful Los Angeles

State of California/ Natural Resources Agency/ Department of Parks and Recreation
*and *the Department of Fish and Wildlife

City of Los Angeles- City Administrative Officer

Los Angeles Conservancy

Land Protection Partners

S&R Partners, LLC, a Riboli Family Company

Trust For Public Land

Latino Outdoors

The extent and breadth of the opposition to, or concern about, this proposed Project is astounding- and should be heard. There are better solutions for Metro and the City of Los Angeles' actual public transportation needs. We ask that you stop this Gondola Project now.

Response P745-6 Refer to Responses GO15, S5, GO8, GO14, P511, P708, GO28, GO13, GO12, GO4, P700, P709, P710, PH24, GO21, GO18, S1, S2, L2, GO16, P701, GO27, and GO22 for responses to the letters referred to in this comment. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment Letter P746 – Heather Donnelly

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P746

Comment P746-1 I am writing to voice my opposition to the Los Angeles Aerial Rapid Transit Project ("The Gondola" at Dodger Stadium).

Response P746-1 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. 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 P746-2 Not only is the project going to disrupt neighborhoods left and right, but it will also disrupt the environment which is already sickened with high amounts of pollution. Additionally, if the dodger stadiums former owner wants an aerial gondola going from union station to dodger stadium, they can pay for it themselves and pay a lot in permits and licenses to the city. We need free shuttles, better one-way connections to far away areas and more climate-friendly forms of transportation. Not a \$300 million gondola.

Response P746-2 Refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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. 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. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Topical Response C, Project Features, discussing the proposed Project's potential partnerships with and benefits to local businesses. As discussed in Section 2.0, Project Description, of the Draft EIR, and Topical Response C, Project Features, 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 H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, a system of buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events 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 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. For example, the current Dodger Stadium Express service from South Bay serves a broad area of southern Los Angeles County at stations spread across eight miles, is free, and travels on a priority lane within the I-110 freeway median for most of its trip, but the South Bay Dodger Stadium Express 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.

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.

Comment Letter P747 – Iran Carranza

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P747

Comment P747-1 My name is Iran Carranza, a native of Los Angeles for over 40 years and finally a homeowner in Boyle Heights as of 2020. My comment is against this proposed project. LA Metro is a public agency beholden to Angelenos and I am formally demanding that you not sell out our valuable public resources to private interests and instead put any available money and resources toward improving existing infrastructure, expanding current public transportation options for better coverage, and making it free like it was during the pandemic.

Response P747-1 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. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. 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. 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 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. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P747-2 If the goal truly is to get more cars off the street this is a much more effective and simpler solution. A gondola is absurd. It is not going to get Dodger fans out of their cars in the long term. I know because I am a Dodger fan and attended 10+ games last year. Those of us who already figured out how to get to union station to take the free

Dodger shuttle are already doing so. It's free. The reality is that those who have not done so, are not going to be prompted to give up driving due to a gondola.

Response P747-2 Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express 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. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data. Further, 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 P747-3 Dodger traffic is a temporary problem while the money, time, and scenic resources we angelenos will have to give up for this gondola would be permanent.

Response P747-3 Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which 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 proposed Project. No public sources of funding have been sought or committed to 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, which would be less than significant. Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project.

Comment P747-4 Those are all objective measurable facts. More subjectively, I believe the gondola would be an eyesore to our skyline. There is no other space like the land of State Historic Park and the free unobstructed space above it.

Response P747-4 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. 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, which 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. 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. Specifically, as it pertains to Los Angeles State Historic Park, the open views of the Park, as well as the view of the downtown Los Angeles skyline, make the Park "visually memorable." As discussed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, views considered to be scenic locally would not be substantially impacted. In addition, while views from the Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views as shown in the simulated views. Therefore, the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant.

Comment Letter P748 – Elysian Valley Riverside Neighborhood Council

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P748

Comment P748-1 We know that the DEIR comment period has closed. However, we want to communicate with you and our new Mayor and Council members representing CD-1 and CD-13, covering immediately-impacted neighborhoods such as Chinatown, Cypress Park, Echo Park, Elysian Heights, Elysian Valley, and Historic Filipinotown, Solano Canyon, and Lincoln Heights, the reasons we oppose this project. We hope you will share this with the Metro Board of Directors.

We are concerned about the proposed Gondola for a number of reasons:

Response P748-1 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. 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 P748-2 through P748-11.

Comment P748-2 1. Despite being a neighborhood impacted by the Gondola, our Neighborhood Council was never invited for input, briefed on impact, nor considered in the Draft Environmental Impact Report.

Response P748-2 Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's public outreach and opportunity for public testimony during the Draft EIR public review period. Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project's scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies, organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. Eight public meetings were held immediately preceding, during, and immediately after 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. 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.

Comment P748-3 2. We do not support projects that gentrify our communities and economically displace our neighbors from their homes, due to increases in property taxes from property value hikes as well as non-Los Angeles Rent Stabilization Ordinance protected rents, and inflated costs of living.

Response P748-3 Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how 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. Refer to Topical Response N, Environmental Justice, for discussion of how the proposed Project would not displace businesses 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. Refer to Topical Response C, Project Features, for discussion of how during construction, 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 through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents.

Comment P748-4 3. We are concerned about the social impacts of development and the high cost to the public to provide infrastructure for private development.

Response P748-4 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. 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. 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. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project.

Comment P748-5 4. We are concerned that this Gondola and subsequent development projects on private property around Dodger Stadium would generate economic displacement of low income families.

Response P748-5 Refer to 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 for a discussion of how the proposed Project solely proposes an aerial gondola system. 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. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how the proposed Project will not displace housing or prevent planned housing.

Comment P748-6 5. We are concerned that should this Gondola project be approved, the greater public would be priced out of using these Gondola Stations.

Response P748-6 Refer to Topical Response N, Environmental Justice, for discussion of how 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. 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 P748-7 6. Will trips be offered at a reduced fare for seniors and students and local residents?

Response P748-7 Refer to Response P748-6 for discussion of the Community Access Plan which would all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost. As discussed in Topical Response N, Environmental Justice, the Community Access Plan would honor Metro's numerous discount fare programs for a variety of needs (i.e., senior fares, student fares, etc.).

Comment P748-8 7. We are concerned that parking in impacted neighborhoods would balloon, considering the limited parking space that currently exists in Union Station, Chinatown Station, and Lincoln/Cypress Station, and due to an influx of Gondola users who would opt to drive to Union Station to access this service.

Response P748-8 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 travel. Parking is not required to be analyzed under CEQA or the Transportation Assessment Guidelines (“TAG”). Nevertheless, the 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.

Comment P748-9 We have many questions over the true public transportation value provided by this Gondola for city residents.

Response P748-9 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. Refer to Response P748-4 for an overview of the need for the proposed Project.

Comment P748-10 Alternatives: We recommend you consider as a non-driving alternative to the Gondola the construction of sidewalks from Dodger Stadium down Stadium way to Riverside Drive for pedestrians and cyclists. Although this was approved with funding in the Elysian Park Master Plan several years ago, sidewalks still have not been built. Furthermore, we believe that bus lanes which would run through Stadium Way and Academy Road with increased frequency on game days, paired with shuttles that run between bus stops and the stadium's myriad entrances, would encourage Metro usage and drastically decrease automobile traffic.

Response P748-10 Refer to Section 5.0, Corrections and Additions, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which 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. While this alternative would provide improved pedestrian connections compared to existing conditions, the 25 minute plus travel time from the Metro L Line (Gold) Station to the location of the proposed Dodger Stadium Station would be at least nine times greater than the three minute travel time between those two locations with the proposed Project, and this alternative would be unlikely to attract substantially more people to walk to Dodger Stadium compared to existing conditions

given the travel time and the physical exertion. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project. Refer to Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express 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. 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.

Comment P748-11 On August 16, 2023, our Neighborhood Council voted to approve sending this letter (6 Yes; 0 No; 4 Abstentions).

Sincerely,

Carey McDonald, President

Elysian Valley Riverside Neighborhood Council

Response P748-11 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 Letter P749 – Amanda Kazen

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P749

Comment P749-1 Good afternoon,

My name is Amanda and I am with ConstructConnect. I had a few questions about the Los Angeles Aerial Rapid Transit (ART) Gondola System project in California . Specifically, I was hoping to find out:

- * When is construction expected to begin?
- * What stage of design is this project in?
- * Who is the architect?

Thanks so much for your help. I look forward to hearing back from you.

Response P749-1 The Draft EIR addressed the construction schedule in Section 2.0, Project Description, of the Draft EIR. As stated on page 2-50, 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. Detailed design phases of the proposed Project would follow certification of this Final EIR and proposed Project approvals. Refer to Section 8.0, List of Preparers, of the Draft EIR for information related to the architects associated with the proposed Project.

Comment Letter P750 – Stop the Gondola

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P750

Comment P750-1 We represent community-based organizations from across Los Angeles focused on protecting the interests of marginalized communities that have keenly felt the impacts of displacement and environmental injustice. This letter expresses our opposition to Frank McCourt's proposed gondola project from Union Station to Dodger Stadium. We have serious concerns it will have a negative impact on the neighborhoods surrounding Chavez Ravine, which include Chinatown, William Mead, Lincoln Heights, Solano and Bishops Canyon, and Echo Park.

Response P750-1 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. Responses to the comments contained in this letter are provided below in Responses P750-2 through P750-9. 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.

Comment P750-2 The proposed gondola is neither a public transportation nor clean air project but rather a means to pave the way for Frank McCourt to develop the parking lots at Dodger Stadium. McCourt's attempt to brand this project as environmentally friendly and the solution to alleviate traffic to the ballpark are untrue. It is a tourist attraction that does nothing to further the genuine transportation needs of LA County.

Response P750-2 Refer to Topical Response A, SB 44, for discussion of how the proposed Project is public transportation because it will be open to the general public for service at regular, scheduled operating times, operating daily to serve existing residents, workers, park users, and visitors to Los Angeles. 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. Also refer to Section 3.03, Air Quality, Section 3.08, 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, of the Draft EIR, for discussion of 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. 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. 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. Refer to 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, for a discussion of how the proposed Project solely proposes an aerial gondola system. 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. Refer to Section 2.1, 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. 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 P750-3 Employing a Nobel Prize-winning method, The UCLA Mobility Lab conducted a study that indicates only 4,690 people would use the gondola on game days. UCLA estimates 8% of fans would take it to the game and only 2% on the way back. Evidence that the gondola will not reduce traffic but will shift it to Chinatown and the communities that surround the stadium. Shifting traffic to these communities will increase pollution there and increase the health burdens that go along with that

pollution. The claims that this is a zero-emissions project are, therefore, grossly exaggerated.

Response P750-3 Refer to Topical Response O, Response to UCLA Mobility Lab Study, for detailed responses to the items in the Mobility Lab Study. 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.

Comment P750-4 Frank McCourt's plans to create a Dodger-themed entertainment complex similar to LA Live or the Grove are well documented. In addition, court documents related to bankruptcy proceedings and the original conditional use permit stipulate McCourt must replace parking spots or provide public transportation to the venue before development can move forward. We believe he is using LA Metro as a cloak to piecemeal this project using taxpayer resources and leverage the agency's credibility.

Response P750-4 Refer to 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, for a discussion of how the proposed Project solely proposes an aerial gondola system. 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. As discussed in Topical Response G, the adoption of the Covenants, Conditions and Restrictions (CC&Rs) (the documents referenced in the comment) 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 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. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project. The Project Sponsor has agreed to reimburse Metro for the fully burdened labor rate of all staff time spent reviewing the environmental documents for ART and, as determined by ARTT LLC and Metro, any community outreach by Metro during the CEQA process, and otherwise pay for the EIR preparer and technical consultants' work on the proposed Project.

Comment P750-5 Not only is this in violation of the State of California's CEQA laws, but it is also a recipe for gentrification on a grand scale. It will push out small business owners and residents who are already struggling with skyrocketing rents. If built, the projects will change these historic neighborhoods forever.

Response P750-5 Refer to Response P750-4 for a discussion of how the proposed Project solely proposes an aerial gondola system. 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. Refer to Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing, for discussion of how 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. 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. 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.

Comment P750-6 We also object to the lack of transparency and meaningful public outreach by LA Metro and McCourt's company LA Aerial Rapid Transit (LA ART). Public meetings that don't provide a forum for meaningful feedback, ask community groups to sign non-disclosure agreements, and then design a route that goes 40 feet over a residential zone is not public outreach. It's force-feeding a project to a community through backroom deals.

Response P750-6 Refer to Appendix A, Scoping Report, of the Draft EIR, for discussion of outreach and community engagement during the Draft EIR scoping period. Metro sought to engage the community in each stage of the environmental review process. Metro engaged the public in decision making for the proposed Project beginning with the public scoping period for the Draft EIR in October 2020 to receive public comment on the proposed Project’s scope of environmental review under CEQA. In June 2021, the Project Sponsor conducted two virtual public outreach meetings. The input from the public, including local community stakeholders, as well as from agencies,

organizations, and interested parties, during this period led directly to changes to the proposed Project to incorporate public feedback, including changes to the proposed Project alignment to include the intermediate Chinatown/State Park Station, redesign of the proposed Project stations and junction and additional pedestrian enhancements including hardscape and landscape improvements. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of outreach and community engagement during the Draft EIR public review period and community engagement efforts during the preparation of the Final EIR. The Draft EIR was released on October 17, 2022, for a 60-day public review period, which Metro extended an additional 30 days for a 90-day public review period ending on January 17, 2023. 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. 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. Refer to Appendix A, Public Outreach Report, of the Final EIR, for discussion of the proposed Project's opportunities for public testimony during the Draft EIR public review period. During the public review period, comments on the Draft EIR could be submitted in writing via email or mail, by phone, and in writing or verbally during the four public hearings. Interpretation was provided in English, Spanish, Mandarin, and Cantonese during all four public hearings, with interpretation provided in Taishanese during the final two public hearings. Refer to Section 2.5, Proposed Project Alignment and Components, with supporting data provided in Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR, for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. 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. 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 P750-7 As opposition began to mount against the project, Frank McCourt distanced himself from the gondola and announced he "donated" it to Zero Emissions Transit (ZET) a new environmental non-profit organization established by Climate Resolve. Neither organization has experience building or managing transportation projects. This week, Frank McCourt's companies refused to answer press inquiries and instead referred

questions to Climate Resolve. This is greenwashing pure and simple. The fact that McCourt brought a non-profit from outside our community to serve as a front for a project that won't reduce emissions or traffic is an insult to a neighborhood that has suffered more than its fair share of injustice.

Response P750-7 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 Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft EIR. 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. 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 and would result in a net reduction in criteria pollutant emissions by reducing vehicle miles travelled. 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. 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 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 would include analysis by a team of qualified experts, consultants, and engineers, including Fehr & Peers as to transportation; SCJ Alliance as to gondola systems; PCL Construction Services, Inc. as to construction; and Nabih Youssef Associates Structural Engineering as to structure engineering.

Comment P750-8 By the way, the sole source deal entered into by LA Metro, LA ART and now Climate Resolve does not live up to Metro's own procurement standards. It gives cover to a private project supposedly funded by private dollars (the details of the finance plan have not been revealed). It will be managed by a brand-new organization with no experience or money to complete it. We have to wonder if, ultimately, the taxpayers will be left holding the bag.

Response P750-8 This comment raises issues that were litigated and decided in *The California Endowment v. Los Angeles County Metropolitan Transportation Authority*, Case No. 22STCP01030 (Jan. 9, 2023, Order Denying Petition for Writ of Mandate). There, the Los Angeles Superior Court upheld Metro's sole source determination for the proposed Project. Refer to Topical Response L, Project Sponsor and Proposed Project

Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final EIR, which provide 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 proposed Project. No public sources of funding have been sought or committed to the proposed Project. Refer to Response P750-7 regarding ARTT LLC's continued funding and technical support, including funding for consultant and technical work provided by a team of qualified experts, consultants, and engineers with relevant experience and expertise in transportation and aerial transit systems.

Comment P750-9 As Metro proceeds through the draft environmental impact report, we implore you to reconsider the folly of moving forward with a project that does nothing to address the real transportation needs of our county and provides no guarantee that taxpayers won't pick up the tab for the advantage of one person.

Response P750-9 Refer to Section 2.3.7, Purpose and Need, of the Draft EIR, for an overview of the need for the proposed Project. Refer to Response P750-8 for discussion of the proposed Project's capital, operation, and maintenance costs and planned sources of funding.

Comment Letter P751 – Tony Torres

The full bracketed letter is provided in Appendix C, Public Comments on the Draft EIR, of the Final EIR for reference.

Responses to P751

Comment P751-1 Cory,

We are pleased to support to Metro more than 6,000 cards signed by supporters of the LA ART project. These cards were collected from neighbors and businesses along the proposed alignment as a part of LA ART’s outreach to the surrounding community. We are encouraged by the support that this innovative mobility project has received, as it will be an iconic and much-needed addition to LA’s transportation network.

– Tony Torres

Response P751-1 This comment indicating support for the proposed Project is noted for the record 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. This comment attached a link to access 6,078 comment cards indicating support for the proposed Project. These comment cards are available on the proposed Project’s SB 44 website.

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