



November 16, 2020

**VIA ELECTRONIC MAIL**

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Mayor Eric Garcetti  
Metro Board Chair  
200 N. Spring Street  
Los Angeles, CA 90012

Re: Notice of Preparation (NOP) - Comment Letter for Los Angeles Aerial Rapid Transit Project

Dear Mr. Washington and Honorable Metro Board Chair, Mayor Garcetti:

The California Endowment ("TCE") and Homeboy Industries ("Homeboy") submit this comment letter to Metro as the lead agency for the Los Angeles Aerial Rapid Transit Project (the "Project" or "Gondola") to express our respectful opposition to the Project. As proposed, the Project does not appear to fundamentally reduce congestion, improve mobility to Dodger Stadium, or benefit working families in the region. Furthermore, the lack of transparency by the Project proponents to date raises serious alarms regarding their commitment to a robust participatory process for the public and organizations within the Project's sphere of influence. We strain to understand how this privately-funded project with a per-person ticket price of \$30 meets any of Metro's stated objectives to increase transportation options for the millions of Angelinos who rely on Metro as a transportation lifeline, many of whom struggle with lower wages and income inequality.

We speak both as Metro's neighboring property owners and as non-profit organizations committed to the prosperity and equitable treatment of the people and communities that comprise our great City, County, and Los Angeles region. We know the benefit of having groups come together with a shared vision to create a transformative addition to the City of Los Angeles ("City"). We fear the proposed Project is on its own path towards quickly implementing a development that is detrimental to that shared vision and does not represent the needs of local residents, business owners, community stakeholders, or even Dodgers fans. Existing public transit between Union Station and Dodger Stadium via a zero-emission bus that is free to the public is efficient, cost effective, does not impose additional burdens on the surrounding community, and is a beneficial alternative to the Project that should be explored and expanded. Based on currently available materials, the Project's anticipated benefits do not outweigh the

burden to the public due to the likely displacement and congestion that a project of this scale would cause.

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## **I. The Project Description Is Inconsistent with CEQA**

The California Environmental Quality Act, Public Resources Code Section 21000 *et seq.* (“CEQA”) requires a stable and consistent project description to facilitate public participation in the decision-making process. *County of Inyo v City of Los Angeles* (1977) 71 CA3d 185, 192. (“Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental cost...”). As of the date of this letter, the route, location and specifications of Project infrastructure have not been made available to the public, preventing meaningful public discourse on Project impacts. Substantial questions about the Project and potential Project impacts remain unanswered. For example, we understand the Project has been represented by LA ART (the “Applicant”) as benefitting all Angelenos and specifically reducing personal vehicle use during the baseball season— a period of approximately 6-7 months, which typically includes 100 home games at Dodger Stadium. However, there is nothing in the materials to account for the increase in traffic from personal vehicle use in and around the areas created by the Project or further traffic burdens to the surrounding neighborhood during the remaining 265 days of the year. We are deeply concerned that the Project has been designed and fast-tracked with no meaningful consideration for, or engagement with, the very community it is supposed to serve. Moreover, the Project would require significant use of public resources.

### Equity and Community Impact

As proposed, the Project imposes a substantial burden on surrounding communities without providing any meaningful benefits to those communities. In addition, we have seen no efforts made to provide vital Project information to the public, such as the placement, height and dimensions of Gondola towers or to involve the community in determining whether the Gondola provides any benefit to the people whose neighborhoods will be directly impacted by this Project, such as Chinatown. We request that Metro and the Applicant disclose all Project details to the public, to be vetted with the community in advance of further Project review and to determine consistency with Metro’s own action plan for community engagement and outreach protocol as described in the 2019 Public Participation Plan and Connect Us Action Plan. The detailed Project specifications should be reviewed by the public before, not after, the full project scope is disclosed through the publication of an Environmental Impact Report (“EIR”). CEQA requires that a project be analyzed with a static project description, which must be in place before commencing the required environmental analysis. Here, the Project’s potential impacts demand a full disclosure of the project details for public consideration before commencing environmental review. The Project must be analyzed in the context of the local neighborhoods and the potential future expansion of important community-serving uses in the area.

### Public Resources for Private Use

Additionally, the Project is attempting to address a supposed public transportation problem which has yet to be clearly identified, with a purported solution that is not even connected to the Metro system. While we recognize that there may be benefits in certain public/private

partnerships, such relationships work best when the public entity remains firmly in control of ensuring its public purpose and not delegating its role to private projects that are designed to generate a profit. Metro's crucial transportation services to low-income households, and Black and Brown communities throughout Los Angeles are more critical now than ever. These services include

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transportation to grocery stores, medical care facilities, employment centers for essential workers, and other necessities. Given the substantial need for public transportation and investment in public infrastructure, is now the right time for Metro to be expending limited resources managing environmental review for a private project that will serve no meaningful benefit to the broader public as a transportation alternative? Respectfully, we believe these limited resources may best be redirected towards the expansion of cost-effective bus and rail lines that serve LA's commuters.

### Greater Transparency Is Needed

Despite multiple inquiries from stakeholders and the public, questions like these, and questions about the nature of Project itself remain unanswered. The Notice of Preparation ("NOP") was released on October 1, 2020 and a public scoping meeting was held on October 22, 2020 ("Scoping Meeting"). Documentation from these events and meetings with the Applicant and Metro failed to disclose crucial Project details to the public and the community most impacted by the Project. By not producing an Initial Study along with the NOP or releasing comprehensive Project details at the Scoping Meeting, the Applicant has further limited the ability of stakeholders to meaningfully engage in dialogue about the merits of the project and permit the Applicant to meet its legal obligation of soliciting meaningful input about the scale, scope and character of the development.

## **II. The Project In Relation to the Surrounding Neighborhoods**

Metro and the Applicant have not provided sufficient information to the public to adequately evaluate potential impacts on surrounding neighborhoods. As proposed, the Project would transport riders between Union Station and Dodger Stadium in enclosed gondolas via a system of towers and cables that would move between passenger stations. The Project appears to include at least three passenger stations, at Union Station, Dodger Stadium, and the Los Angeles State Historic Park. Metro's Scoping Meeting materials state that the Project will provide game

day transportation capacity of between 10,000 and 12,000 fans, which could reduce up to 3,000 vehicle trips to Dodger stadium for each game.<sup>1</sup> Total capacity at Dodger Stadium is approximately 56,000 fans, including 16,000 parking spaces. Each individual gondola could accommodate 30-40 passengers per ride.<sup>2</sup> The Project would operate year-round, and also provide access to Elysian Park. The Project will bisect Alameda street and has been touted as a zero-emissions alternative mode of transportation that "could" reduce neighborhood and freeway congestion.<sup>3</sup> The total trip time, one-way, is estimated to take seven minutes over a one-mile distance.<sup>4</sup>

TCE, Homeboy and the communities along Alameda Street, between Union Station and the Los Angeles State Historic Park have deep roots in this area. The Project will negatively impact

many current and proposed socially beneficial projects planned for the community, including Homeboy's proposed transitional housing project, TCE's existing Center for Healthy Communities conference center, and the proposed Hope Village area. TCE is invested in expanding access to affordable,

<sup>1</sup> Metro, *Scoping Meeting Presentation*, October 22, 2020, page 20.

<sup>2</sup> Metro, *Scoping Meeting Presentation*, October 22, 2020, page 22.

<sup>3</sup> Metro, *Scoping Meeting Presentation*, October 22, 2020, page 20.

<sup>4</sup> Metro, *Scoping Meeting Presentation*, October 22, 2020, page 23.

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quality healthcare for underserved communities. TCE's goal is to create a future California that offers equitable healthcare services for all individuals. TCE believes in fostering a welcoming community where all individuals can learn and grow together. Under its Building Healthy Communities initiative, TCE has partnered with fourteen diverse communities across California to help expand opportunities to bolster neighborhood health. Through this endeavor, TCE has focused on community health through a variety of strategies, including the health of local schools, overall public health, environmental health and racial justice, and anti-displacement.

Since 1988, Homeboy Industries has provided support and training opportunities for formerly gang-involved and incarcerated men and women. Homeboy serves over 10,000 former gang members from across Los Angeles that constitute Homeboy's client base. Homeboy's clients are provided a variety of services, free of charge, including case management, mental health services, legal services, and education. Additionally, some clients participate in an 18-month employment program allowing them to successfully find a stable job. Homeboy Industries is at the Southeast corner of N. Alameda Street and Bruno Street adjacent to where the Project is proposed. Homeboy provides services to thousands of people every month at this location. By offering former gang members a place to work, Homeboy provides them with a safe and supportive environment to learn skills and support their families. Homeboy has also established the Global Homeboy Network, partnering with other organizations across the globe to bring job skills training, cost-free programs and services, and social enterprise employment to local neighborhoods.

The Project, without a comprehensive redesign, will be a significant barrier to both TCE and Homeboy's current operations and their ability to further expand their crucially important services to more people in Los Angeles County. Both TCE and Homeboy are already strategically planning for the future growth of these community service uses and programs and are acutely aware of how the Project impedes these expanded services.

#### TCE Center for Healthy Communities Campus Los Angeles

TCE's Building Healthy Communities Initiative is focused on empowering local communities to change the conditions, policies and practices that create racial, health and opportunity disparities in communities. TCE is partnered with fourteen communities across California to engage in place based community change initiatives to build healthy and safe neighborhoods for children to grow up in. Much of this work is accomplished by creating spaces for collaboration by nonprofit service providers. The Center for Healthy Communities on Alameda is such a

space.

TCE's Center for Healthy Communities campus has become an anchor pillar of the region's nonprofit community, annually hosting thousands of conference attendees to work on the wellness gaps in our community.<sup>5</sup> Every year TCE welcomes over 150,000 guests to its campus. For example during 2019, the Center for Healthy Communities Campus hosted an average of 8

conferences per day for community stakeholders such as the City of Los Angeles, the County of Los Angeles, and LA Metro. This includes over 500 Grantee conferences, 700 Government conferences, and 800 non-profit conferences annually. At TCE, we strive to continue to expand these programs and are actively planning on adding additional programming space, that will

<sup>5</sup> The California Endowment <<https://www.calendow.org/the-center-for-healthy-communities/los-angeles/>> (as of November 2, 2020).

increase our daily visitor count and help to complete the vision of the campus. Completing the TCE campus will foster the development of additional community leadership, civic engagement, and transitional housing support in the community. The California Endowment's Center for Healthy Communities represents opportunities for civic engagement and participation by the nonprofit sector in improving community well-being in the region. Completing the TCE campus is also complementary to the shared vision of establishing a "Hope Village" for the further advancement of the community. Over the last several years, The Endowment has reached out to the City to discuss the possibility of using the triangle park immediately adjacent to TCE for the benefit of the community and has regularly supported its maintenance and upkeep. This park and adjacent street were anticipated to be part of the expanded TCE campus envisioned in the Hope Village project. Given the proximity of the Project along Alameda Street to the TCE campus, it would be a significant impediment to completing the campus and expanding these community service uses.

### Homeboy Industries

Homeboy strives to change the way the world views, judges and treats Southern California's most marginalized people. To achieve these goals, Homeboy is planning a campus expansion that will accommodate additional programming and social enterprises for the benefit of the community, including transitional housing and daycare services. Access to these services is an important contributor to community health and stability. Homeboy is aligning their strategic plan to stand with, heal, and invest in those that we serve. Homeboy's programs serve approximately 275 clients at any one time, and serve an additional 150 clients per week. Homeboy's campus expansion is necessary to achieve the ambitious service goal of doubling the number of trainees and community clients Homeboy serves annually.

### Hope Village

Homeboy and TCE have partnered in a shared vision for the future of the community focused on the potential development of Hope Village, re-imagining the geographic triangle between the downtown Men's Central Jail, the Homeboy campus, and The California Endowment's Center for Healthy Communities campus. See Figure 1 below for a map of the Hope Village proposal

area.

This endeavor will help transform the area into a social services corridor for the City and County of Los Angeles and would fill a gap in our societal safety net by providing a sustainable and compassionate solution to recidivism in our justice system. This shared vision involves creating a community that provides services to support inmates who are too often released from jail directly into cycles of hopelessness and homelessness. Homeboy Industries has a demonstrated track record of transforming lives harmed by crime and violence to ones marked by healing, hope, and employment.

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Figure 1.



The County of Los Angeles has been instrumental in their involvement in our efforts of making Hope Village a reality. We look forward to continuing to work with the County to imagine replacing what is now a footprint of the jail along with other vacant, aging properties, with an integrated, bustling village of services and structures. Such community services would include mental health and substance abuse treatment facilities; job training and referral services; supportive, transitional, and affordable housing developments; and a dedicated center for civic engagement and community leadership.

Through the work of TCE, Homeboy, and other local organizations, this area of Los Angeles has already evolved from a forgotten sector of our community to a thriving hub for events and gatherings. While we are supportive of smart development that fosters community equity and multi-modal transportation options, the Project as proposed poses a dire risk to furthering these goals and impedes the growth in services that the community needs to thrive. TCE and Homeboy oppose the Project as proposed, given the lack of transparency and information currently available to the public regarding the Project, and the Project's inability to function as a beneficial or economically affordable transit option for the community.

We are concerned that the Project as proposed will prevent these community defining developments from becoming a reality. Metro and the Applicant have simply not released

sufficient details for the public to adequately assess the numerous ways these future goals would be put in jeopardy. However, even with the limited information that is available, the Project would present a permanent obstruction to future growth in the area by virtue of its proximity adjacent to both the TCE and Homeboy campuses along Alameda Street. Specifically, any future development of these properties would be prohibited or at a minimum, inhibited next to and under the Project towers and cable infrastructure due to fire and life safety requirements.

Additionally,

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the Project would have a variety of operational impacts, including noise, privacy and safety concerns. The Project must take these community serving developments into account and be redesigned to not imperil their future.

### **III. Lack of Project Details Results in Inadequate Community Engagement**

For the public to adequately evaluate how the Project can be modified to better serve the community, Metro and the Applicant must make available additional Project details. Our primary concern is that the Project is not reflective of the community and will serve as a physical impediment to expanding more equitable community-serving opportunities. The Project serves a targeted, private interest that does not appear to substantially benefit the broader commuting public, particularly the low-income community who may wish to attend a Dodger game or visit Elysian Park with members of their family. The estimated cost of \$30 per passenger does not allow the Project to serve the needs of the community as a useful and regular means of transportation. As proposed, the Project appears to be a private tourist attraction that is positioning itself as a public benefit that requires the use of public access and public resources. While collaboration between the public and private sectors is often necessary to collectively solve the City's most pressing transportation challenges in ways that serve all Angelenos, a heightened level of scrutiny is required when taxpayer public resources are involved. Since this Project requires the utilization of substantial public resources and imposes a burden on the community, there must be a corresponding and proportionate benefit to the broader community. In other words, the communities most burdened by this Project should not be those least benefitted by its existence. Further, the high cost per ride prevents those who live the closest to the Project from utilizing it. This will alienate the community by creating only a tourist attraction while forcing the community to take on the lion's share of the negative environmental and social impacts. The public must be more involved in this early stage, especially since the Project depends on government investment through potential easements, licenses, land funding, and other mechanisms that will be necessary for its construction.

To determine the direct and indirect negative impacts on the aforementioned community-defining developments, specific Project details need to be released before Metro begins preparation of the Draft Environmental Impact Report ("DEIR"). The Project's lack of transparency has made it difficult for the community that may be directly impacted by this Project to provide meaningful feedback during the public comment period on the Notice of Preparation, which should be incorporated into the Project before Metro moves forward with the environmental analysis. Many fundamental questions and project features remain undisclosed or undetermined. We, and the communities most affected by the Project, need to understand and evaluate these Project components before they become the predetermined elements of a project to be studied in an

environmental impact report. These questions include:

1. What is the total number and proposed location of the Project towers, cabling system, and any other mechanical support infrastructure?
2. What government provided easements or licenses will be necessary to construct the gondola system and supporting infrastructure?
3. What setbacks or other limitations will apply to future development on properties adjacent to the gondola system?

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4. What Project features are being included to address the significant noise, community safety, and privacy issues that will inevitably arise by bringing thousands of new tourists to the community daily?
5. How will Metro rail operations of the L line be affected by constructing the Project? The community relies on this transportation to get to work every day. The Project itself doesn't provide a practically useful transportation mode for these individuals.
6. What closures and modifications to the streets in the community will be both temporarily and permanently affected to accommodate this Project? How will these closures and modifications to streets benefit a community that is already heavily trafficked?
7. The Project necessitates the need for public land. How is this land being acquired? The Project must disclose the overall land acquisition plan and costs surrounding the acquisition of public lands. TCE and Homeboy have significant concerns about the use of public lands for private benefit.
8. Where will Project users park their cars? What measures will be implemented to prevent parking and transportation impacts on the adjacent communities?
9. Metro and the Applicant have not shared Project details regarding how it will ensure the security and safety of the local community given the introduction of thousands of new visitors to the community.

#### Meaningful Community Engagement Requires Disclosure of Project Details

The Project has progressed through this first public comment period without publishing fundamental details regarding the Project design and functions. Metro should demand the Applicant provide critical details about the Project and engage the community and stakeholders to shape and design a project that addresses both the community's future needs and the vehicular traffic that the Project is purporting to address. How local residents and businesses envision their future neighborhood is crucial to understanding how any new development can be built to be compatible with the vision for the neighborhood. This is especially the case for a development that will alter the landscape and built environment as significantly as the Project. As Metro knows, crafting a stable project description is essential to providing a comprehensive environmental analysis for public review. It is unacceptable for the public to have to wait until



the release of the DEIR to be provided with basic project details, especially when the community has not been involved in the Project's design process.

### The Applicant's Approach is Inconsistent with Metro's Community Engagement Objectives

Metro requires high standards for community engagement. Metro's own 2019 Participation Plan describes Metro's standards for community engagement and participation. Specifically, the 2019 Participation Plan described a variety of methods utilized "to engage diverse communities and create ongoing public access, participation and input throughout the environmental process."<sup>6</sup>

<sup>6</sup> Metro, *2019 Public Participation Plan*, October 2019, page 32.  
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The Public Participation Plan further states that "[a] comprehensive public participation plan is one that provides early and ongoing access for all stakeholders, while demonstrating the principles of environmental justice[.]"<sup>7</sup> Metro also employs a four factor analysis in helping to determine various social, cultural, economic, and historic barriers that could prevent a member of the public from participating in the public decision-making process.<sup>8</sup> The Participation Plan calls for Metro to undertake a comprehensive engagement plan that could include stakeholder briefings and workshops, community update meetings, newsletters, and online media outreach.<sup>9</sup> Metro has not met these important public communication standards for the Project.

Additionally, Metro's "Connect US" Action Plan provides a roadmap for how Metro can successfully develop linkages through a community-driven process for all projects. Specifically, "[a] core objective of Connect US is that the process be community driven. The [Connect US] plan reflects the community's voice regarding how best to enhance paths leading to and from Union Station and the 1st/Central Station."<sup>10</sup> To ensure the engagement process was also inclusive, "[t]he outreach strategy was built on a multi-lingual approach to encourage as many people as possible to participate, and included Spanish, Chinese (or Mandarin), Japanese and Korean translation and interpretation."<sup>11</sup>

The Connect US Plan saw engagement by Metro of over one hundred entities in the study area and the organization of three community events, a design charrette, and a multitude of other project briefings and neighborhood conversations.<sup>12</sup> This level of community engagement is a new framework of accountability for public transit projects. Metro must ensure the same level of community and stakeholder engagement for the LA Art Project before moving forward with an environmental review of a project of this scale and level of complexity. We request that the public be engaged in a meaningful and comprehensive way so that the Project can better represent the needs of the community rather than simply a private interest.

The Applicant's inability to address even these basic Project details during the initial public comment period is concerning, as it implies a lack of consideration for the future vibrancy of the community and its residents. Many participants at the Scoping Meeting expressed concern that there hasn't been enough public outreach, that the Project does not fit the context of the surrounding neighborhoods, and that it does not provide a realistic public transit option.

TCE and Homeboy are advocates for smart development and growth, but future projects must

provide actual benefits to the communities they serve. As we understand the Project, it appears to be a simple tourist attraction that will provide no practical benefit to the community. Rather, it will have negative environmental and social impacts that will disrupt the bright future of area that has been decades in the making. We therefore oppose the Project as proposed because based on publicly available information, it represents an unacceptable disruption to future civic engagement and equitable community growth.

<sup>7</sup>*Id.*

<sup>8</sup>*Id.* at pages 32-33.

<sup>9</sup>*Id.* at page 33.

<sup>10</sup> Metro, *Connect US Action Plan*, October 22, 2020, page 14.

<sup>11</sup> *Id.*

<sup>12</sup> Metro, *Connect US Action Plan*, October 22, 2020, page 17.

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## **IV. Policy Implications**

### *a. Historic Displacement at Chavez Ravine*

Given Metro's dedication to community involvement, and LA's ugly history of displacing communities for private gain, now, more than ever, it is crucial to include the community stakeholders in the evaluation process for projects that impact their homes and livelihoods.

Now home to Dodger Stadium, Chavez Ravine is one such example of that displacement. In the early 1950s, the City labeled Chavez Ravine as "blighted," targeting the area for redevelopment as a series of public housing units called the "Elysian Park Heights Project."<sup>13</sup> At the time, the neighborhood was home to many Mexican-American families, who were prevented from living in many other parts of the City by racially-driven redlining policies. To accommodate the redevelopment of Chavez Ravine, City officials used coercive means to displace these families from their homes and property, including forced eviction, eminent domain, and offering minimal compensation far below actual property values.<sup>14</sup> Displaced families were told that they would be able to return to reside in the newly-constructed public housing units once the project was completed.<sup>15</sup> However, the City abandoned the Elysian Park Heights Project by 1953.<sup>16</sup> Although the City had acquired the property at Chavez Ravine on the condition that the property be used for the public's benefit, a June 1958 voter initiative authorized the City to trade Chavez Ravine to a private party for the construction of Dodger Stadium.<sup>17</sup>

This abuse of local land use policy is in part related to stifling the voices of community stakeholders. We fear history will repeat itself with the Project in Chavez Ravine. One solution is to ensure that adequate information about the Project and related developments is made available to the public for comprehensive evaluation of Project's current and future impacts. For example, as discussed in more detail below, the materials provided by Metro and the Applicant do not provide sufficient information to determine how the Project will impact parking, traffic, and congestion in and around Dodger Stadium – an area notorious for its parking and traffic issues. Similarly, there are no answers for why the Project does not provide additional parking of any kind, which negates the Applicant's claims that the Project can be used as an alternate method

of transportation. Unless and until the Metro and the Applicant can provide additional Project specifications, the Project can only be viewed for what it is: a tourist attraction for the benefit of private enterprise, constructed by burdening surrounding communities with yet unknown traffic, noise and congestion implications. This is one of many reasons why we must object to the Project as proposed.

<sup>13</sup> Elina Shatkin, *LAist: The Ugly, Violent Clearing of Chavez Ravine Before it Was Home to The Dodgers* <[https://laist.com/2018/10/17/dodger\\_stadium\\_chavez\\_ravine\\_battle.php](https://laist.com/2018/10/17/dodger_stadium_chavez_ravine_battle.php) (as of November 3, 2020). <sup>14</sup> *Id.*

<sup>15</sup> *Id.*

<sup>16</sup> *Id.*

<sup>17</sup> *Id.*

#### *b. Project Construction and Operation*

During the Scoping Meeting, the Applicant stated that the Project would primarily utilize the public right-of-way for the route and the location of the passenger loading stations and towers. However, no details have been provided as to how the gondola towers and any supporting mechanical infrastructure can be sited to avoid the need for acquiring private land or the compensation to local government for use of public land. If the Project can be completed mostly within the public right-of-way, it is unclear how it qualifies as a public project.

The public right-of-way is limited to public projects and should not support private interests unless the public is compensated for the public resources. The public should be engaged before formalizing the project description as to the status and process for acquiring the land outside of the public right-of-way and how Metro is either justifying the Project as a public project or is being compensated by the Applicant for the use of the public right-of-way.

Additionally, we are concerned that the Project will significantly affect the Alameda Triangle Park, one of the only green spaces along Alameda and near both TCE and Homeboy. The community needs to be consulted through project workshops and design charrettes before any modifications are made to these indispensable public spaces. Any future projects in the area need to enhance these community serving areas, not eliminate the precious few that exist. Further, we understand that one of the Project alternatives will analyze the possibility of providing additional passenger entry locations at or near Alameda park. Not only will this further degrade the nearby open space, but it will necessitate the need for further parking in the area to accommodate the additional passenger ingress to the gondola system.

#### *c. Project Operations and Privacy*

Our primary concern is that the Project does not provide a public transit option equally accessible by all members of the community. The cost of admission to ride the gondola, proposed at \$30 per person, is well beyond the means of most families in Los Angeles as a

mode of public transportation. When coupled with the cost of Metro transportation and a ticket to a Dodger game, the Project's proposed pricing for an individual passenger makes it clear that the Project is not geared towards the majority of Metro riders and residents of the region.

Further, by encouraging an increase in tourism in the area to utilize the gondolas, the Project will increase traffic in an area already impacted by inadequate parking and pedestrian amenities. TCE and Homeboy strive to build healthy and sustainable communities and these impacts will further detract from the livability of the neighborhoods along Alameda. The foundation of a healthy society is grounded in the individuals who already make-up the fabric of the community. As the Project further induces rapid visitor growth, those that have invested in the community for generations will be left with a Project that simply does not serve their needs and detracts from the ability for future smart growth. Any project in this area should be designed against the backdrop of protecting and serving the local community. We expect that the Applicant and Metro want to deliver a final project with these exact goals in mind. Unfortunately, the Project as proposed is antithetical to achieving these goals.

The community is being asked to absorb the negative impacts of the Project without having direct benefit or input in the design and implementation. The Applicant cannot hope to create a Project

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that benefits the community without engaging the individuals that comprise the community in any meaningful way. For example, the Project either does not have a plan for or has not disclosed information related to a variety of topics paramount to the public interest and will directly affect the future of the community. At a minimum, TCE and Homeboy believe any Project must comprehensively resolve the following concerns before moving forward.

- i. How will the Project provide sufficient parking near the passenger stations?
- ii. How will the Project reduce the impact of 3,000 displaced vehicle trips to Union Stations and the State Historic Park?
- iii. How is the Project justifying the additional traffic being injected into this community on every non-gameday of the year?
- iv. What is the proposed future use of the vacant parking lots at Dodger Stadium caused by the Project?
- v. How does the proposed cost of a single ride allow the Project to serve the needs of the community as a useful means of alternative/last-mile transportation?
- vi. How will operational times be limited to maintain the peace and quiet and security of the local communities along the Project route, especially during Dodger night games?
- vii. In light of the COVID-19 pandemic, how is this Project responsive to future pandemics or public health emergencies?

viii. How will Project modifications to accommodate the public health concerns described above impact the operational effectiveness of the system?

ix. How will emergency access to the system work? Especially in the event of an earthquake.

Additionally, the height of the Project at approximately 200 feet is also a significant privacy concern for those along the route. For both commercial and residential properties along Alameda, there would be a direct line of sight from the right-of-way into all adjacent properties. While we understand that in an urban environment it's difficult to manage all privacy concerns, having such a tall structure in the public right-of-way is a unique situation that warrants special attention and innovative solutions from the Applicant.

## **V. Environmental Implications**

Once Metro and the Applicant engage the community to formulate a project description that fits the community, then, and only then, can a comprehensive environmental analysis be completed. Even with the limited Project details, there are a multitude of environmental impacts implicit in the fundamental Project concept that warrant serious analysis. Metro, as the lead agency, has an obligation to thoroughly study the following environmental implications on the specific community

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that the Project will impact. A sufficient environmental analysis must consider the specific conditions of the area and not merely provide a generic analysis that doesn't fit the realities of the community.

### *a. Construction and Operational Noise*

The Project's proposed route is planned to be adjacent to residential, commercial, and educational properties between Union Station and Dodger Stadium, primarily following Alameda Street before jogging to the northwest near the Los Angeles State Historic Park. Although the Applicant indicates that most of the Project will be constructed within the public right-of-way,<sup>18</sup> the lack of disclosure and planning of the gondola tower and supporting mechanical infrastructure locations in relation to these existing uses makes community assessment related to construction and operational noise impossible. Due to the lack of information, we must assume that construction of the Project without further modification will cause significant noise impacts to sensitive receptors. The Applicant and Metro must disclose proposed locations of all towers along the proposed route. Further, the Project should be modified to minimize the number of towers. Any necessary towers or non-passenger junctions should be studied in locations that are not proximate to any sensitive receptors. Community workshops would be helpful in determining the best locations for the Project towers and related infrastructure before moving forward with a project description that studies inappropriate tower locations.

Additionally, the Applicant and Metro need to disclose how the Project is planning to address operational noise impacts. Operational noise that will impact the community will come from two primary sources. First, the gondolas mechanical infrastructure will cause a consistent increase

in noise along the route. This will be amplified near towers and passenger loading stations. Since the Project is primarily focused on providing a novel experience for fans attending a Dodger game, the gondola will be used primarily for Major League Baseball (“MLB”) games approximately 100 days out of the year. A weekday Dodger game begins at approximately 7:00 pm local time and ends, on average, at about 10:00 pm. Unfortunately, this means that the gondola system will be in operation throughout most weekdays, at least until 12:00 am (or until all visitors can ride the gondola back to Union Station). This is a significant burden to place on a community for almost a third of the year. The hardship on the community living and working near this attraction is not balanced by any benefits to the local area.

In addition, it is not clear that the Applicant and Metro have considered the noise intrusion by the mass of people moving into and out of the area throughout the day and night. The Applicant will inevitably be unable to control rowdy fans in the late-night weekday hours when the rest of the community is trying to rest. Serious thought needs to be given as to these operational concerns and whether the Project should be limited in its hours of operation, especially on non-gamedays. Metro should begin a dialogue with the community to address these significant concerns before moving forward with the environmental analysis.

<sup>18</sup> Metro, *Scoping Meeting Presentation*, October 22, 2020, page 23.  
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#### *b. Traffic and Parking*

After various conversations with the Applicant and Metro, it is apparent that there is not currently a plan to deal with the displaced parking from Dodger Stadium into the community. The Project materials state that on an average gameday, the Project will displace approximately 3,000 vehicle trips and 10,000-12,000 individuals.<sup>19</sup> While this seems beneficial to the community, without a well-developed parking plan, the communities surrounding Union Station and the State Historic Park will be overflowing with vehicles forced to park on surface streets. In addition, the overflowed parking may threaten cyclist safety by increasing congestion on narrowed streets.

Further, the cost of parking near the stations will only add to the already exorbitant cost of a trip on the gondola. Metro has indicated that while the Project does not currently propose the construction of additional parking, Union Station is already at capacity and unlikely to be able to accommodate the additional parking needs of up to 3,000 new vehicles. The communities surrounding Union Station and the State Historic Park also have insufficient existing parking facilities to accommodate the population influx that the Project is anticipating. These vehicles will then utilize the surrounding neighborhood streets, further causing traffic congestion. If Metro intends to utilize existing facilities near the proposed passenger loading stations, this information must be made available for public comment. Without these details, the initial noticing period cannot facilitate meaningful discourse on the Project.

The Applicant and Metro have disclosed no assumptions about traffic impacts and parking loss on non-gamedays. Since the gondola would operate throughout the year, the Project would increase traffic in the community throughout the entire year. The daily increase in vehicles to the area will also dramatically increase correlated greenhouse gas and air quality impacts. The Project is essentially asking the community to bear the environmental impacts of the Project without consideration for their future needs.

Finally, there is already a very effective Metro public transit option between Union Station and Dodger Stadium. The Dodger Stadium Express buses provide a convenient and free transit option between Union Station and Dodger Stadium with the purchase of a ticket to the game. The Dodger Stadium Express is a clean air public transportation option, diverting approximately 11,500 tons in its 24-year existence.<sup>20</sup> Many riders of the express bus park at Union Station to catch the bus. Metro should continue to focus on this as a primary transit option for the community instead of the private gondola system. While the Project intends to divert vehicle trips to Dodger Stadium, it will likely be more successful at occasionally diverting riders of the Dodger Stadium Express. These riders are already taking an environmentally friendly and more cost-efficient transit option. The Project's transportation assessment must study the adverse impacts the Project will have on the Dodger Stadium Express and the parking supply at Union Station.

<sup>19</sup> Metro, *Scoping Meeting Presentation*, October 22, 2020, page 20.

<sup>20</sup> Metro, *Dodger Stadium Express* <<https://www.metro.net/riding/dodger-stadium-express/>> (as of November 2, 2020).

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The Applicant should also explain any additional sustainable features being adopted in the construction and operation of the Project. Based on the Project details, it does not appear that any additional sustainable features are being considered beyond the unlikely traffic diversion.

### *c. Community Degradation*

The Project also will create a tourist attraction in the area that will undoubtedly lead to substantial unplanned visitor growth. This investment will lead to a change in the local population that otherwise does not represent the current community and will further hinder the ability to build out necessary community-serving uses such as Hope Village. By transforming the area into primarily a tourist destination, current residents and small business owners will be economically driven out of the area. Based on currently available information, the Applicant and Metro have not considered any measures to prevent displacement resulting from the Project. Public resources should be directed towards socially beneficial groups that help the existing community thrive, not projects that simply seek to eventually replace the current population. TCE and Homeboy have spent decades fostering just these types of community-sensitive projects. The Project as proposed puts into jeopardy our ability to continue to help the

individuals that call this area their home.

The Project will further degrade the community by obstructing scenic viewsheds. The Project's proposed height will greatly reduce views in the east-to-west direction across Alameda. Based on the current plans, towers are slated to be approximately 200 feet in height. At this height and with the gondolas operating throughout the entire year, views from east-to west across the area will be permanently obstructed. Further, the late-night operations of the gondola on gamedays will necessitate significant lighting both for security and to comply with FAA regulations that will further negatively impact the livability of the area.

#### *d. Historic Resources*

We are also concerned with how the Project will affect historic Dodger Stadium. If the Project is able to relieve the need for approximately 3,000 vehicle spaces at the stadium, the Applicant needs to disclose how those newly vacant parking areas will be repurposed. Our understanding is that a portion of that area will be a storage facility for the gondolas. Constructing such a facility, and any other future development considerations related to the Project, needs to be studied for impacts to the historic stadium and discussed with the community at this stage of the review process.

Further, there are a variety of other historically designated buildings, or buildings eligible for listing, along the Project route. Any such structures should be studied as a part of the DEIR. The community should be informed as soon as possible as to whether the Project would necessitate modifications or indirect impacts to these structures. If so, the Project route should be altered to avoid construction near any designated or eligible resource.

#### *e. Biological*

The Project's proposed route and design materials need to be comprehensively studied to determine potential negative impacts to two of the only green open spaces in the community. These include the Alameda Triangle Park and the Los Angeles State Historic Park. Both of these

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parks are slated to accommodate a Project tower or passenger junction, which will greatly alter the very intent of an open space. Specifically, the State Historic Park will now become a boarding site for the Project, taking away from the relaxing and bucolic atmosphere traditionally associated with the park. Further, the Alameda Triangle Park would be rendered unusable given its already modest size. The Project should be designed to accommodate rather than infringe on these community open spaces. We would request that the Project be modified to avoid any use of local parks.

The Project's route involves a multitude of glass and metal gondolas suspended over 100 feet above the ground. The system will undoubtedly have a negative impact on migratory birds and other avian species near passenger loading stations and throughout the entire proposed route. The final Project should include materials and design elements that minimize impacts to avian species. Any gondola operations should be limited during nesting season to ensure minimal impacts to nesting birds.



## **VI. Conclusion**

We request that the Applicant and Metro engage the community in a transparent and meaningful way before proceeding with its CEQA analysis. This can be accomplished by releasing Project details, addressing the questions and concerns detailed in this letter, and scheduling a variety of community workshops shops and design charettes. Our organizations are only two of many that serve and thrive in the sphere of the proposed Project. A thorough and robust community engagement effort is essential given the vulnerabilities experienced by the neighborhoods along the path of the project. Further, this form of outreach plan would be in-line with Metro's own goals for providing sufficient public engagement. Homeboy and TCE believe that the Project does not provide sufficient benefits to a community burdened with negative economic, social, and environmental impacts. Without further direct input from the community and modification to the Project design and operations, we have no choice but to oppose approval.

While TCE and Homeboy are advocates for smart development and growth, this Project as proposed benefits a private interest, and does not serve a public purpose. Therefore, unless and until these issues of transparency, equity, and community benefit can be satisfactorily addressed, The California Endowment and Homeboy Industries respectfully oppose the Project. We are happy to help facilitate a more robust community conversation to assess how the Applicant can help shape the future of this cherished community in a meaningful way. We look forward to beginning these conversations and request that Metro, as the lead agency, demand that the Applicant provide the crucial Project details outlined in this letter to the public. Metro should pause their work until such action occurs, along with implementation of a detailed engagement plan and Project modifications.

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Respectfully,

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CEO  
The California Endowment

Father Gregory Boyle, S.J.  
Founder  
Homeboy Industries

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