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January 17, 2023

Mr. Cory Zelmer  
Deputy Executive Officer, Metro  
One Gateway Plaza, Mail Stop 99-22-6  
Los Angeles, CA 90012  
VIA EMAIL: [LAART@metro.net](mailto:LAART@metro.net)

**RE: Los Angeles Aerial Rapid Transit Project  
SCH 2020100007**

Dear Mr. Zelmer:

This letter is submitted on behalf of The Coalition for a Beautiful Los Angeles (CBLA) in response to the Draft Environmental Impact Report (DEIR) released by Metro for the Los Angeles Aerial Rapid Transit Project (LA ART), proposed by LA Aerial Rapid Transit Technologies LLC. The Project, which is proposed to connect Los Angeles Union Station to the Dodger Stadium property with an intermediate station at the Los Angeles State Historic Park via an aerial gondola system, is one of great concern to CBLA.

Our CBLA organization (formerly Coalition to Ban Billboard Blight), is a non-profit organization dedicated to protecting and enhancing the City's visual environment through education and political action on behalf of many important issues, including: reducing visual blight from billboards and other forms of commercial signage to promote traffic safety and improve public health; preserving urban forest and open space; establishing federally-recognized Scenic Byways; undergrounding utility lines; treating our scenic resources as treasures to be passed on to future generations; promoting equitable public policies to accomplish those goals.

With the LA Art Project, our main concern is the lack of specificity and vaguely referenced advertising program within the gondola stations, on gondola towers, at the junction, and on the gondolas themselves and the potential significant impacts. We are also concerned about light glare and aesthetic impacts to the LA State Historic Park over which gondolas will travel at varying heights. In addition, we question whether the visual impact analysis in the DEIR appropriately uses the LA City CEQA threshold guide for analysis of park impacts, because it is a very minimal standard and should not apply.

Neither the DEIR document nor its appendices adequately describe the Project's proposed signage program. The vague description contained in the DEIR that the "proposed Project would include signage" that "may include identification and other static signs, electronic digital displays and/or changeable message light-emitting diode (LED) boards that include both transit information and other content, which may include off-site advertising" does not provide adequate information to assess impacts and attempt to identify mitigations (if possible to mitigate the impacts). The DEIR goes further to state that "Signage would be architecturally integrated into the design of the ART system including its stations, the junction, towers, and cabins." (DEIR p. 2-45)



The Project Description Section 2.7.3 Signage states: “Such signage may include identification and other static signs, electronic digital displays and/or changeable message light-emitting diode (LED) boards that include both transit information and other content, which may include off-site advertising that generates proceeds to support transit system costs and operations.” Thus, we know that the operators of the Program seek to raise advertising revenues to help support the operation of the Project. This stated reliance upon advertising revenues to help finance the Project tells us only one thing for certain. That is the potential for the addition of more and more advertising faces, structures and/or panels associated with this program should operating revenues fail to provide the revenues anticipated and/or desired.

There is clearly not sufficient information provided for the public or those responsible for evaluating the Program to assess impacts when we are not provided with any specific descriptions of what lies within the realm of possible signage programs. We request a full analysis of every type, size, and manner of sign and whether static or digital, projection, or video, single or two-faced, lighting source and intensity of lighting, changing messaging, rotation rates, proximity to traffic, whether they will project ambient glare into the Historic Park, nearby residences, and other sensitive uses, etc. A chart that identifies types and numbers of signs must be provided. Will there be inward or outward facing signs on the cabins? Will there be analytics and/or data gathering capabilities on any of the signs which will trigger the need to address privacy issues? Please explain and provide a complete detailed analysis.

The provision of wayfinding signage should not present significant negative impacts if done in a consistent, tasteful manner and with signage respectful of its setting. Examples should be provided. Such signage, particularly if seen by passing drivers, should not incorporate changing messaging.

Transit information signage is provided in many cities on singular solar-powered poles with small LED text displays. Metro and LA ART do not need and should not seek to construct massive structures or advertising structures under the guise of providing transit riders with wayfaring information. The reference to “other content” is extremely troubling and opens the door to untold commercial signage.

Section 2.7.4 of the Project Description introduces many sources of lighting that are not sufficiently defined or described. The very presence of the LA ART project creates the need for lighting in numerous locations, including but not limited to its stations, junction, and towers. Additional lighting is to be placed underneath stations and along pedestrian access routes. The lighting is an issue not only pertaining to aesthetics, but it carries impacts to biological resources, wildlife, night sky pollution and may negatively impact those individuals who live in the area. There are many studies that document the impacts of lighting on wildlife, including this study done in conjunction with USC for the National Park Service, which is relevant to this Project because of its impacts on parkland: Longcore, T., and Rich, C., 2016. Artificial night lighting and protected lands: ecological effects and management approaches (revised August 2017). Natural Resource Report NPS/NRSS/NSNS/NRR — 2017/1493. National Park Service, Fort Collins, Colorado.

# CBLA

Those who live, work, or travel in the vicinity of this Project, those who visit the Historic Park, those who look upon Union Station and El Pueblo de Los Angeles as landmark and architectural icons for our City may be negatively impacted by a barrage of electronic advertising beamed via electronic displays (digital or otherwise) from stations, gondola towers, junctions, and gondola cabins.

We do not accept the language in the DEIR that states that “signage would be in conformance with all applicable requirements of the Los Angeles Municipal Code (LAMC)” as adequate assurance that the negative impacts of the Project’s sign program will be acceptable or adequately mitigated. Given that the LAMC is subject to change and that the adoption of sign regulations in Los Angeles has proven to be highly politicized, such language provides no long-term assurance to those who value the visual landscape and seek to reduce sign blight and halt its proliferation in the City. The introduction of (digital) signage on moving gondolas in the sky presents an entirely new form of sign blight with the only comparable image being one of the singular Goodyear blimp that travels across the LA Basin with a very irregular presence in any one given location or community. The blimp travels at much higher elevations than the proposed gondolas and is seen only incidentally while the gondolas would have a fixed route and presence, leading not only to the impacts experienced as viewed, but contributing to harmful cumulative impacts as well.

It is vital to consider the impacts of the advertising program on the Los Angeles State Historic Park. Should lighted advertisements appear on the outside of the moving gondola cabins there will be significant visual and aesthetic impacts at visually sensitive locations along the gondola alignment. The DEIR acknowledges the impact of the gondolas and their towers on views from the Historic Park toward the downtown skyline, a protected aesthetic resource, which will “be partially interrupted due to the Project” and this does not even take into account the impacts that would occur should outside mounted advertisements be placed on the cabins. With the advent and advancements seen in LED lighting technology, it is possible that each gondola cabin could have changing ad panels with messages that rotate within seconds. There are no descriptions as to the types, hours of operation, message rotation schedules, etc. included in the DEIR. There are no limits as to what might be installed or operated. It is therefore impossible to assess the light and glare impacts of unknown displays. The project description is faulty, analyses is deferred until later as are proposed mitigations. This makes it impossible to conclude in the DEIR that the impacts will be less than significant.

Please add our comments to the record in this case and keep us informed of any upcoming meetings and/or hearings related to this Project.

Sincerely,



Barbara Broide  
Co-President



Wendy-Sue Rosen  
Co-President