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Via email and overnight mail to LAART@metro.net

Corey Zelmer
Deputy Executive Officer
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Mail Stop 99-22-6
Los Angeles, CA 90012

RE: Los Angeles Aerial Rapid Transit Project
SCH 2020100007

Dear Mr. Zelmer:

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”).

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.
 - 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:
 - 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).

- 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.
 - 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 within 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).
 - 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.
 - 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.
- 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?
 - 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.
 - 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)

- 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.
- 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!
- 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.