



January 17, 2023

Mr. Cory Zelmer
Deputy Executive Officer, Metro
One Gateway Plaza, Mail Stop 99-22-6
Los Angeles, CA 90012

Re: Draft Environmental Impact Report for Los Angeles Aerial Rapid Transit Project

Dear Mr. Zelmer,

The California Department of Parks and Recreation (State Parks) welcomes the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Los Angeles Aerial Rapid Transit Project (Project). State Parks is a State Agency as defined by the California Environmental Quality Act (CEQA) and our mission is to provide for the health, inspiration, and education of the people of California by helping preserve the state's extraordinary biodiversity, protecting its most valued natural and cultural resources, and creating opportunities for high quality outdoor recreation.

State Parks and its partners spent more than 20 years planning, developing, and protecting the Los Angeles State Historic Park (LASHP). This park provides the city and surrounding communities with much-needed public open space and iconic views of downtown, opportunities for civic engagement and public programming on the cultural significance and diversity of greater Los Angeles, all while also protecting valuable historic resources within the urban core of Los Angeles.

The LASHP has also become a popular venue for special events, large and small, drawing visitors from all over the world. While State Parks recognizes that the Project is expected to result in numerous public benefits, including traffic reduction, better air quality, and improved transportation connectivity for the surrounding communities, all of which are consistent with the state's broad environmental goals and supported by State Parks, it will also impact LASHP operations in significant ways, as described in more detail below.

The proposed project, with respect to the LASHP, includes a station for loading and unloading passengers at the southern entrance of the park, with ropeways and cabins traversing the southwestern edge of the park, connecting the LASHP station with a junction tower just outside of the park on the other side of Broadway. In total, the Project would require permanently taking approximately 0.21 acres for the physical transit station, and up to 1.87 acres of the 32-acre park (6%) that would be restricted not only by the station, but by the overhead development and operational rights for the aerial infrastructure, including the cable ropeway, which would be suspended at just 26 feet over the park at its lowest spot. If constructed, the Project would require the demolition of park improvements in the project area, with additional areas to be impacted in the event these improvements, such as the Cargo Snack Shack concession

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and restrooms, are relocated to other areas of the park. Furthermore, a number of trees will need to be removed and the areas under the ropeway will need to be kept clear of vegetation and structures over a certain height, thus reducing the available park space for event organizers and public park users, potentially limiting the size and scope of future events.

As noted in the DEIR, the Project is not consistent with the LASHP General Plan, which would need to be amended prior to State Parks granting any administrative approvals. Authority for approving such state park general plan amendments rests solely with the State Park and Recreation Commission (SPRC). While the project applicant would be responsible for submitting a general plan amendment document that meets State Parks' requirements and policies for such proposals, State Parks would also be responsible for analyzing and making recommendations to the SPRC. State Parks understands that the thresholds under CEQA and the required record and analysis for a general plan amendment are different. However, State Parks recommends that the project applicant further analyze the following impacts in the DEIR: (1) the substantial loss of property within LASHP; (2) the impairment of scenic viewsheds and high-value open space; and (3) project impacts that will constrain and reduce the ability to utilize the LASHP for special events. Other impacts such as, but not limited to, hours of operation, design and materials of facilities, and access during construction, are also meaningful issues that will need to be discussed further during the general plan amendment process before the SPRC.

Should the General Plan be successfully amended to include the Project, State Parks looks forward to working collaboratively with the Project team to identify appropriate operational agreements, transactional terms, and other measures needed to ensure the benefits of the Project outweigh the impacts, direct and indirect costs, and specifically, ensure that LASHP visitors' overall experiences will be improved as a result.

Sincerely,

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Jason De Wall
Northern Field Division Chief

cc: Kathy Amann, Deputy Director