



California State Park Rangers Association

Promoting Professionalism in California State Parks since 1964

PO Box 39, Lee Vining, CA 93541

www.cspra.com

December 21, 2022

OFFICERS

President

David Carle

Vice President

Ann Meneguzzi

Secretary

Joanne Kerbavaz

Treasurer

Ron Krueper

DIRECTORS

Cindy Begbie

Erin Gates

Jonathan Irwin

Jean Rhyne

Rob Pickett

Sal Goshorn

Sue Neary

Cory Zelmer

Los Angeles County Metropolitan Transportation Authority

One Gateway Plaza Mail Shop 99-22-6

Los Angeles, CA 90012

cc: Armando Quintero, Director, California State Parks

California State Parks Commission

Re: Los Angeles Aerial Rapid Transit Project DEIR

These comments regarding the Los Angeles Aerial Rapid Transit (LAART) Project DEIR, are provided by the California State Park Rangers Association (CSPRA), an organization of active and retired State Park professionals dedicated to advancement of the highest principles of public service, established to support and preserve California State Parks for present and future generations. Our focus is on the impacts of this project to Los Angeles State Historic Park, (LASHP) as the proposed gondola tramway route would cross one end of the 32-acre park, including cables carrying gondola cars just 26 feet overhead, and a station building with a 98-foot-tall tower. To permit a "transportation corridor" across the park would require an amended LASHP General Plan. That amendment process should never begin. This project has no relationship to LASHP's historic purposes, is not consistent with the mission of a state historic park, and would be an abuse of public land designated to be preserved for its historic and open space values. The DEIR claims, without documentation, that the gondola could remove 3,000 cars from the streets and provide clean energy transportation benefits. Those claims do not hold up to expert analysis in transportation and energy research reports from the University of California, Los Angeles (UCLA).^{*} Instead, little traffic reduction will result, according to the UCLA transportation analysis, while electric busses would be 19 times more energy efficient than a gondola.

LASHP was created more than two decades ago, in a successful effort by a coalition of far-sighted community members and organizations that pushed for the creation of a unique State Historic Park in the urban core of Los Angeles. The land was set aside to save it from development, to address a critical lack of open space in Los Angeles, and to preserve an area that played important historic roles in the development of the city. After years of public meetings and planning, the California State Parks Commission assigned this parkland the stringent protections that go along with a State Historic Park classification. There is a societal responsibility to preserve, and not diminish that accomplishment. Every state park, including LASHP, is protected as a unique and special place. It is wrong for developers to target parks as relatively inexpensive routes across what they perceive as "open public land." This park, and all state park units, are held in public trust for the benefit of the people.

Comments follow about specific concerns in the DEIR.

David Carle

CSPRA President dave@cspra.com 760 709-1181

Specific comments by CSPRA to LAART DEIR:

Page 58 of the DEIR Executive Summary, Land Use and Planning element, LUP-2, identifies as a “Significant Impact” the conflict with the LASHP General Plan, and describes, as a “mitigation measure” the need to: “*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 approach pushes analysis of the impacts to the park and its visitors out of the DEIR and onto the shoulders of the California State Parks Commission. However, the appropriate place for that analysis is within the project DEIR, where concerns listed below should have been addressed.

Appendix C, Visual Elements, includes Table 3-1 on pages 16 and 17, “Los Angeles General Plan Goals and Guidelines.” However, the visual analysis that follows draws conclusions that are inconsistent with those goals and guidelines. Specifically, the General Plan “Natural Resources” topic calls for establishing “the Park as *an important natural open space* in the Los Angeles Urban area” (emphasis added) and protecting “and enhancing scenic viewsheds and features...by minimizing adverse impacts to aesthetic resources.” An example of the philosophical approach to state historic park management is provided where the Plan calls for “providing visitors with positive natural fragrances and sounds, such as the scent of landscape plantings and sounds of birds and water.”

Appendix C, KOP 16-20, pages 71-74, provide analysis of visual impacts to LASHP, with specific reference to photos 5-18 through 5-22 (comparing existing and simulation views), on pages A18 – A22 of Appendix A. It is challenging to evaluate the text when it references imagery provided later in the document. The focus of the discussion is primarily on distant skyline views and never adequately addresses or effectively illustrates more immediate visual and experiential impacts to park visitors. No consideration is made here of visual awareness or feelings about the invasive presence of cables carrying large gondolas to transport up to 5,000 people per hour in each direction just 26 feet overhead (20 feet for a six-foot-tall person). The photo simulations in Figures F-18, 19, and 20 come closest to depictions of overhead presence. Image 5020a includes groups of park visitors spread out across the area, but adding a simulation to include the cables and cars cannot reveal any reactions from those people to that invasive presence. Still photos cannot portray the attention-grabbing movement of the gondola cars. The DEIR, limited by focusing mostly on distant views, concludes that impacts are insignificant because cables are just part of a busy scene that includes other existing lines, and gondola cabins would be constantly moving in and out of view. That very movement -- one gondola cabin after another in rapid motion -- is instead a convincing argument for a significant impact.

We find these sentences on page 74 to be telling examples of a blindness in this analysis to traditional park values and the unique purpose of LASHP to address a critical lack of open space in Los Angeles: “*Los Angeles State Historic Park is in a highly urbanized area north of downtown Los Angeles. Recreationalist that may reside in the area are assumed to be accustomed to the urban edge of the park, of which the proposed Project would become a part.*” (Emphasis added). Transforming part of the park into an “urban edge” is unacceptable and inconsistent with the General Plan. The discussion becomes argumentative when addressing iconic distant views towards the downtown skyline: “*Existing views of downtown from other areas in the park are already interrupted under existing conditions by trees and intervening development.*” The existence of current spots where the views are interrupted does not justify adding more. “*A visual benefit of the Project near Los Angeles State Historic Park would also be the Park amenities, potential mobility hub, pedestrian improvements, and*

installation of hardscaping and landscaping at the southern entrance to Los Angeles State Historic Park, which currently only includes hardscaping.” The text then lists these so-called visually beneficial amenities as 740 square feet of concessions, 770 square feet of restrooms, and a 220 square-foot covered breezeway. It seems exceedingly odd to suggest that this list, plus the associated 98-foot-tall tower (unmentioned here) provides any *visual* benefit to a State Historic Park. Rather, they are new and significant changes. Unmentioned here is how many currently growing park trees would be removed nearby to accomplish this installation.

Design option E, page 21 of the Executive Summary) addresses the pedestrian bridge from the park over rails toward Chinatown. While that project has been identified as a goal for State Parks, this gondola project, with its many environmental impacts for the park, is not required to accomplish bridge access and inclusion within this flawed proposal is not necessary.

Regarding the alignment alternatives described in the Executive Summary on page 19, the Transportation Systems Management Alternative, also identified as the Environmentally Superior Alternative, or the No Project Alternative, are preferred by CSPRA, as having no direct impacts on LASHP. To repeat a point made earlier in our letter, this project has no relationship to LASHP’s historic purposes, is not consistent with the mission of a state historic park, and would be an abuse of public land designated to be preserved for its historic and open space values.



David Carle
CSPRA President

www.cspira.com



*John Christensen. “LA Art Gondola Energy Use Analysis.” Institute of the Environment and Sustainability, Luskin Center for Innovation. October 24, 2022

“Dr. Brian Yueshuai He and Dr. Jiaqi Ma. “Study Finds Proposed Aerial Gondola to Dodger Stadium Will Do Little to Reduce Traffic and Emissions.” UCLA Mobility Lab at the UCLA Samueli School of Engineering, October 24, 2022.