



## California State Park Rangers Association

Promoting Professionalism in California State Parks since 1964

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February 12, 2024

Planning and Programming Committee  
Los Angeles County Metropolitan Transportation Authority  
One Gateway Plaza Mail Shop 99-22-6  
Los Angeles, CA 90012

cc: California State Parks  
California State Parks Commission

Re: Agenda Item #12 Feb. 14, 2024, AGAINST, Los Angeles Aerial Rapid Transit Project Final EIR

These comments are regarding the Final EIR (FEIR) for the Los Angeles Aerial Rapid Transit Project, submitted by the California State Park Rangers Association (CSPRA) and identified as GO28 in Section 6 of the FEIR. CSPRA is 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. We ask that the Planning and Programming Committee of the LA Metro not certify this deficient FEIR; or approve the project; or adopt a Finding of Fact and Statement of Overriding Considerations for reasons listed below:

- Other transportation alternatives were not sufficiently identified, considered or studied to move the same number of Dodger fans from Union Station to the Stadium as the project proposes in its goals. For example, a dedicated traffic lane with the use of electric buses or other types of “Express Bus” service operations that already serve other major LA venues such as the Hollywood Bowl were not considered or even studied.
- The FEIR identifies as a “Significant Impact” that the project conflicts with the LA State Historic Park (LASHP) General Plan (GP) while calling for the State Park Commission to amend the GP to allow a “transportation corridor” as a “mitigation measure.” The GP recognized the site’s history of transportation as one of the reasons to classify the park as a State Historic Park unit, providing the stringent protection that goes along with that classification. The FEIR claims, LASHP will be *advanced* by this project as it “provides the community a 21<sup>st</sup> century transportation option.” This is an amazing and indefensible assertion – that a modern infrastructure project should be conceived as “historical.” This “Significant Impact” identified to LASHP should be analyzed in this EIR and not deferred to the State Park Commission at a later date.

- The FEIR did not adequately analyze from Key Observation Points the visual impacts of “moving” gondola cabins over LASHP and instead relied on “still photos” to portray the attention-grabbing, invasive presence of moving gondola cars overhead at 26 ft. every 23 seconds, in both directions operating at full capacity. The deficient FEIR analysis stated that the cabins would also be constantly moving in and out of view, suggesting that would minimize their impact where there was no actual study of “eye catching” movement impacts of gondola cabins overhead.
- The FEIR inadequately addresses the impacts to LASHP for the potential loss of 1.87 acres of the 32 acre park (6%) that is held in **Public Trust** for the benefit of all people in California. LASHP was established in 2006 with tremendous community support and is one of the most expensive California State Parks to be established per acre. It provides a very unique open space park in the inner urban core of Los Angeles and is recognized as such. The FEIR simply concludes, without any in-depth analysis, that in the vast majority of the park the public’s enjoyment and use of the park would not be affected. To diminish LASHP, even by 6% in acreage and not analyze the potential impacts to recreational and special event use for the entire 32 acres, the FEIR falls short given the park’s importance. The type and scale of the project’s installations constitutes a significant impact to public land designated to be preserved for its present historic and open space values and for generations to come.

The FEIR deficiencies listed above raise concerns about the integrity of the decision-making process for staff to recommend approval of the project and certifying the FEIR. These “fatal flaws” along with other concerns and impacts identified by others outside LASHP raise serious concerns that impacts were not adequately evaluated to arrive at an Environmental Superior Alternative or the No Project Alternative. Simply adopting a Finding of Overriding Consideration acknowledging that significant impacts may remain shows that the FEIR falls short of adequate project evaluation.

Sincerely,



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