

CHAPTER 2. RESPONSE TO COMMENTS

This chapter of the EIR presents responses to comment documents (letters, emails, and comment cards) that were received on the Draft EIR for the La Brea Tar Pits Master Plan (project). These comments were received from multiple entities, including state and local agencies, non-agency organizations, and members of the public. In accordance with State CEQA Guidelines Sections 15132(d) and 15088, this Final EIR presents the County of Los Angeles's (County) responses to comments submitted during the Draft EIR review process.

The comment documents are in chronological order with the responses following the individual comment documents. Comment documents are reproduced in total, and numerical annotation has been added as appropriate to delineate and reference the responses to those comments. A set of Master Responses has been developed to address certain topical issues raised multiple times by different commenters. These Master Responses are provided in Section 2.1 and referenced throughout the chapter.

Information provided in this chapter clarifies, amplifies, or makes minor modifications to the Draft EIR. No significant changes have been made to the information contained in the Draft EIR that would result in a new or substantially increased environmental impact because of the responses to comments, and no significant new information has been added that would require recirculation of the document under State CEQA Guidelines Section 15088.5.

2.1 MASTER RESPONSES

Many comments submitted by members of the public related to substantially similar issues. The following responses are master responses intended to address all of the comments submitted in relation to these issue areas. All individual responses set out in the following sections related to comments regarding one of these issue areas refer to the appropriate master response identified in this section to avoid unnecessary length and duplication in this document.

Table 2.1-1. Master Responses

Master Response #	Master Response
MR-1	<p>Preferred Alternative</p> <p>Section 15126.6(a) of the State CEQA Guidelines requires an EIR to "describe a reasonable range of alternatives to a project, or to the location of a project, which could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." The EIR provides this analysis in Chapter 6, Alternatives Analysis. As directed by the State CEQA Guidelines, because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment, the discussion of alternatives in Chapter 6 is focused on alternatives to the project which can avoid or substantially lessen any significant effects of the project (State CEQA Guidelines Section 15126.6(b)). Table 2-2 in Chapter 2 of the EIR provides a summary of the potentially significant impacts of the project and corresponding mitigation measures. Table 5-1 in Chapter 5 of the EIR provides a summary of the impact determination for each resource section of the EIR.</p> <p>Chapter 6 of the EIR identifies, describes, and evaluates four alternatives. As detailed in Chapter 6, Refined Alternative 3, Adjust Footprint to Reduce Contact with Page Museum and Expand Central Green, would result in similar environmental impacts as the project for each issue area analyzed in this EIR, except for historical resources and land use and planning where the alternative reduces the identified impacts. However, despite these reductions, impacts to historical resources and land use and planning would remain significant and unavoidable even with the implementation of Mitigation Measures CR-HIST/mm-1.1 through CR-HIST/mm-1.5. Refined Alternative 3 would include the renovation of the Page Museum within the existing building footprint, similar to the project, but would incorporate a series of design refinements to reduce impacts on certain primary character-defining features of the Page Museum. Specifically, the following adjustments are included in Refined Alternative 3:</p> <ul style="list-style-type: none">• The central, open courtyard of the Page Museum, which contributes to the indoor-outdoor integration of the museum and is a primary character-defining feature, would no longer be covered and converted to indoor space; it would remain as an open courtyard. The landscaping

Master Response #	Master Response
	<p>and hardscaping features of the courtyard would be renovated to create a more usable public space and include climate-appropriate and native vegetation relevant to interpretive themes of the tar pits. This differs from the original Alternative 3, which replaced the open courtyard with research laboratory space.</p> <ul style="list-style-type: none"> • The structural space frame that supports the frieze (the open-air, steel-grid roof that enhances the indoor-outdoor integration of the Page Museum and is a primary character-defining feature) would not be altered or capped, as had been proposed in the original Alternative 3. Instead, the existing space frame and open-air grid roof would remain intact as it is currently but would be repainted and repaired. • The Page Museum and the new museum building would be connected only with a covered, open-air breezeway; the original Alternative 3 proposed a physical connection/joining of the two buildings. An entrance would be incorporated into the northwestern corner of the Page Museum to provide access to the breezeway. The open-air breezeway that is proposed in the Refined Alternative 3 is a contrast to the previous concept of an enclosed entrance space joining the two buildings, which was proposed by the original Alternative 3. This change in the Refined Alternative 3 design means the connection between the two buildings would be scaled down, and demolition at the northwest corner of the Page Museum would be reduced, thereby retaining more of the original character-defining features and materials of the historical Page Museum resource. • Removal of a portion of the berm would be focused at the northwest corner to accommodate a new entrance to the Page Museum, and modification of the west and north sides of the berm would still be necessary, albeit in a scaled down manner. The modifications would result in a new version of the berm that would allow for an Americans with Disabilities Act (ADA) ramp up to the terrace level on the west, and a change in elevation on the north allowing for access to the new entrance. • As described above, the on-site surface parking would be reconfigured to complement the adjusted building footprint. The original Alternative 3 proposed two driveways along 6th Street and one driveway on South Curson Avenue for public vehicular access to the parking lot. However, it has been determined that it would be operationally preferred to eliminate the driveway at the far western end of the parking lot on 6th Street. The result is that Alternative 3 would have one driveway on 6th Street and one driveway on South Curson Avenue. This modification has been further addressed in the Transportation analysis contained in Section 6.4.4.2, below. • The programming for interior spaces of the Page Museum and the new museum building would be revised, resulting in changes to the location of the theater, classrooms, the retail store, the café, and other interior elements. The Page Museum would also feature less staff office space than originally proposed. • The canopy above the existing main entrance to the Page, which was envisioned in the proposed project and the original Alternative 3, would not be included in Refined Alternative 3, and would be replaced with trees to shade the proposed stepped seating. • The reduced footprint of Refined Alternative 3 would require less ground disturbance during construction and would result in less soil import and export. The features retained by Refined Alternative 3 would be maintained and repaired as needed. • Like the project, Refined Alternative 3 would include renovations to address deferred maintenance of the building and systems and to meet modern seismic, electrical, building code standards, and universal design standards. <p>After completion of the Draft EIR, the County, acting through the Museum of Natural History Foundation, considered the EIR evaluation with respect to the Draft EIR comments made by the commenting entities and individuals. As a result, the County considered how Alternative 3 could be further enhanced to meet the intent of the alternative and further meet the objectives of the County and commenting entities alike. Through this consideration and exploration, refinements to the original Alternative 3 have been developed, which are presented in Chapter 6, Alternatives Analysis, of this EIR. New text added to the EIR since publication of the Draft EIR is shown as underlined text and deleted text is shown as strikethrough text. As discussed in Chapter 6, Refined Alternative 3 merely amplifies and expands upon the broad intent of the original Alternative 3. As reflected in edits made to Chapter 6 in this Final EIR, differences between the Refined Alternative 3 and the original concept are not substantial from an environmental perspective. According to State CEQA Guidelines 15088.5, the four conditions which require an EIR to be recirculated are as follows:</p> <ol style="list-style-type: none"> (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented. (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance. (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it. (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Master Response #	Master Response
	<p>The adjustments made in the Refined Alternative 3 do not constitute “significant” new information because no additional substantial environmental effect of the project has been identified, nor has the severity of an environmental impact been increased. Further, Refined Alternative 3 does not differ considerably from the original Alternative 3 that was described in the Draft EIR. Instead, Refined Alternative 3 merely includes further detail and refinements to the design to better incorporate reductions of the potential impacts to the character-defining features of the Page Museum, which is a historical resource. There has been no disclosure of any feasible alternatives or mitigation measures that would clearly lessen the impacts of the project that the County has declined to adopt, nor does Refined Alternative 3 propose new mitigation measures. Lastly, there has been no evidence provided which demonstrates that the Draft EIR was inadequate or conclusory in nature. Therefore, none of the conditions for recirculation of the Draft EIR, as specified above in State CEQA Guidelines 15088.5, have been met.</p> <p>The County will be seeking approval of Refined Alternative 3, Adjust Footprint to Reduce Contact with Page Museum and Expand Central Green, by the Los Angeles Board of Supervisors (Board of Supervisors) as it reduces historical impacts while attaining the project’s basic objectives. Refined Alternative 3 consists of the original version of the alternative included in the Draft EIR in combination with the refinements described in Chapter 6 of this Final EIR.</p>
MR-2	<p>Impacts to Native and Mature Trees</p> <p>Several comments were received on the Draft EIR expressing concern over the number of trees to be removed as a result of the project, specifically regarding native and mature trees. Additionally, many commenters pointed out that the Draft EIR lacked a tree inventory and did not specify which trees would be slated for removal or relocation.</p> <p>As discussed in Section 3.4.7.1 of the EIR, more than 330 trees currently exist within the project site. The EIR indicates that the project would require the removal and replacement of 150 to 200 trees, and estimates that up to 10 percent of these trees would be relocated rather than replaced. The project would favor avoiding or reducing tree removal where possible. As discussed in Section 5.3, Biological Resources, page 5.3-24, Mitigation Measure BIO/mm-6.1 has been identified to reduce the project’s impacts to the 13 protected oak trees located on the project site. However, other than these oak trees, there is no requirement for the project to protect or preserve any of the existing trees. Despite this, the County will strive to prioritize the protection of existing trees, particularly those that are native species and/or mature, and would avoid their removal if feasible, while also meeting the budgetary and design needs for the project. However, many trees would not be able to be retained due to several project requirements, including, the excavation requirements for construction of the new building, the relative proximity of the trees to the new building location, planned park accessibility improvements, and fire access requirements.</p> <p>Appendix N has been added to the Final EIR which provides the tree inventory completed by the design team for the project. Appendix N includes tree locations and species identification. The Tree Inventory provides additional information about existing conditions at the site and supports the analysis contained in the EIR. The tree inventory does not change the proposed plan for the treatment of trees onsite or otherwise affect the EIR analysis; rather, it provides additional substantiation of the analysis included in the Draft EIR. The environmental analysis regarding vegetation and local tree impacts that is contained in Section 5.3 of the EIR is an accurate assessment of the potential for significant environmental impacts regarding tree and vegetation removal and no changes to this assessment are made through the Final EIR process. No “significant new information” has been identified through the inclusion of Appendix N. As the Tree Inventory only clarifies and supports the impacts regarding the removal of existing trees which was already discussed within the EIR, recirculation is not required.</p> <p>The exact trees to be removed through implementation of the project would not be finalized until after the EIR is certified and the project concept is approved by the County Board of Supervisors. As more detailed construction documents are developed, the County will continue to update the count of new native trees to be planted. While it may be that the design can be refined to reduce the number of trees that would be required to be removed and replaced, until more detailed construction documents are prepared, it is not possible to commit to a lower number of trees to be removed. Trees would need to be removed where they conflict with the footprint of the project (e.g., new buildings or hardscape features, like pathways). Furthermore, it is important to note that many trees slated for removal would be those which are diseased or in bad health or are non-native species. Regardless of the implementation of the project, these trees may have to be removed anyway if they threaten any structures, or the safety of visitors. It should also be noted that the project would result in an increase in the number of native trees at the project site. These native trees are more resilient and likely to survive and thrive over the long term as they are uniquely adapted to the local southern California climate.</p> <p>Appendix N has been added to the Final EIR which provides the tree inventory completed by the design team for the project. Appendix N includes tree locations and species identification. The preparation of the Tree Inventory, included in the Final EIR as Appendix N, provides additional information about existing conditions at the site and the information that supports the analysis contained in the EIR. The tree inventory does not change the proposed plan for the treatment of trees onsite or otherwise affect this information does not change the EIR analysis; rather, it provides additional substantiation of the existing conditions information in the EIR and supports and clarifies the analysis included in the Draft EIR. The County acknowledges the importance of balancing the recreational and naturalistic values of the park with the objectives of the project. With implementation of the project, Hancock Park would continue to act as an</p>

Master Response #	Master Response
MR-3	<p>important natural resource for neighboring residents and visitors. While completion of the project would require the removal of several mature tree specimens, the County would be planting significant native trees and vegetation to improve the overall park experience.</p> <p>Furthermore, no “significant new information” has been identified as a result of these changes. As the changes to the EIR only clarify and support the impacts regarding the removal of existing trees which was already discussed within the EIR; therefore, recirculation is not required</p> <p>Use of Native Plants and Vegetation</p> <p>Several comments were received requesting that the project should limit the removal of existing native species in the park and should prioritize using native plants for landscaping.</p> <p>The plant palette, which is provided in the EIR in Chapter 3, Project Description, responds to the existing park setting and the historical significance of the site; it is based on the native vegetation of the Los Angeles Basin and was informed by research gathered from the La Brea Tar Pits fossil record. The palette specifically highlights plants which were previously present at La Brea Tar Pits as historical floral communities. The plant palette also prioritizes pollinator resources. Information on the planting strategy is provided starting on page 3-19 of the EIR. As shown in Figure 3-10, the planting and landscaping concept for La Brea Tar Pits would be divided into three distinct zones encircled by the looping path system. Each loop of the pedestrian path would have a theme that represents different geologic epochs—Pleistocene in the southeastern loop, Holocene in the northwestern loop, and Anthropocene in the central loop (Figure 3-12 through Figure 3-14 of the EIR provide illustrations of these concepts and the species of the plant palette).</p> <p>While some trees and vegetation would be required to be removed to fully realize the design of the Master Plan, the landscaping concept for most of the site responds to the native vegetation of the Los Angeles basin and has been informed by the research gathered from the fossil record of La Brea Tar Pits. Furthermore, it should be noted that the plant palette consists primarily of California natives and contains considerations for historical floral communities and pollinator resources. However, the plant palette contains a limited quantity of adapted species in some areas of the site, due to practical reasons. The County and the project design team will continue to refine the designs as the project develops to account for the most protections possible for native plant resources.</p> <p>Despite the importance of the identified native species on the project site, some existing native plant specimens would need to be removed to accommodate the objectives of the project. However, the planting strategy would ensure that the resulting vegetation establishment of native species after project implementation would be greater than under existing conditions. The discussion included in the EIR regarding native plants and vegetation is accurate, and no “significant new information” has been identified. Therefore, no changes to the EIR are necessary.</p>
MR-4	<p>Non-Substantive Comments</p> <p>Pursuant to State CEQA Guidelines Section 15132, <i>Contents of Final Environmental Impact Report</i>, and Section 15088, <i>Evaluation of and Response to Comments</i>, the Final EIR shall consist of the response of the Lead Agency to significant environmental issues raised in the review and consultation process.</p> <p>Substantive comments typically do one or more of the following:</p> <ul style="list-style-type: none"> • question, with reasonable basis, the accuracy of information in the EIR; • question, with reasonable basis, the adequacy of, methodology for, or assumptions used for the environmental analysis; • present new information relevant to the analysis; • present reasonable alternatives other than those analyzed in the EIR; and/or • cause changes or revisions in one or more of the alternatives. <p>In cases where the comment does not raise a substantive issue relevant to the environmental analysis, detailed responses are not warranted. Non-substantive comments for the purpose of the Final EIR typically include statements of opinion or preferences regarding a project’s design or its presence as opposed to points within the purview of the EIR. These points may be relevant for consideration in the project approval process at the County Board of Supervisors and will be made available through their publication in this Final EIR; however, they do not warrant revisions to the EIR or preparation of detailed responses in the Final EIR.</p>

2.2 AGENCY COMMENTS AND RESPONSES

The following agencies have submitted comments on the Draft EIR.

Table 2.2-1. Agency Comment Documents Received

Respondent	Code	Contact Information	Page
California Governor's Office of Planning and Research State Clearinghouse EIR posted: June 7, 2023	SCH	1400 10 th Street Sacramento, CA 95814	2.2-3
Los Angeles County Metropolitan Transportation Authority Letter dated: October 20, 2023	Metro	One Gateway Plaza Los Angeles, CA 90012 <i>Contact: Cassie Truong, Senior Transportation Planner, Development Review Team Transit Oriented Communities</i>	2.2-8
California Department of Transportation District 7 Letter dated: October 26, 2023	Caltrans	100 South Main Street MS 16 Los Angeles, CA 90012 <i>Contact: Miya Edmonson, LDR/CEQA Branch Chief</i>	2.2-19

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2.2.1 California Governor's Office of Planning and Research State Clearinghouse

La Brea Tar Pits Master Plan Project

Summary

SCH Number

2022020344

Lead Agency

Los Angeles County

Document Title

La Brea Tar Pits Master Plan Project

Document Type

EIR - Draft EIR

Received

9/11/2023

Present Land Use

13-acre public park, research facility and museum

Document Description

The project would result in upgrades to the 13-acre La Brea Tar Pits site, including renovations to the George C. Page Museum and the development of a new museum northwest of the George C. Page Museum. The project would also include improvements to the existing tar pit facilities, modifications to the configuration of the pedestrian paths, and improvements to the recreational areas within the site.

Contact Information

Name

Leslie Negritto

Agency Name

County of Los Angeles

Job Title

Chief Operating Officer, Natural History Museums

Contact Types

Lead/Public Agency

Address

900 Exposition Boulevard
Los Angeles, CA 90007

Phone

SCH-1

(213) 763-3303

Email

lnegritto@nhm.org

Name

Bobbette Biddulph

Agency Name

SWCA

Job Title

Senior Environmental Planner

Contact Types

Consulting Firm

Address

320 N. Halstead Street Suite 120
Pasadena, CA 91107

Phone

(626) 553-7995

Email

bobbette.biddulph@swca.com

Location

Coordinates

34°0'0"N 118°0'0"W

Cities

Los Angeles

Counties

Los Angeles

Regions

Citywide, Countywide, Southern California

Cross Streets

Wilshire Boulevard, South Curson Avenue, West 6th

Zip

90036

Total Acres

13

Jobs

17

Parcel #

SCH-1
(cont'd)

5508-016-902

State Highways

SR 2, SR 101

Railways

N/A

Airports

N/A

Schools

Fusion Academy, Hancock Park Elementary School, Westside Jewish

Waterways

N/A

Township

34N

Range

-118W

Section

20, 21

Base

N/A

Other Location Info

5801 Wilshire Blvd, 90036

SCH-1
(cont'd)

Notice of Completion

State Review Period Start

9/11/2023

State Review Period End

10/26/2023

State Reviewing Agencies

California Air Resources Board (ARB), California Department of Fish and Wildlife, South Coast Region 5 (CDFW), California Department of Forestry and Fire Protection (CAL FIRE), California Department of Parks and Recreation, California Department of Water Resources (DWR), California Highway Patrol (CHP), California Native American Heritage Commission (NAHC), California Natural Resources Agency, California Public Utilities Commission (CPUC), California Regional Water Quality Control Board, Los Angeles Region 4 (RWQCB), California Santa Monica Mountains Conservancy (SMMC), Department of Toxic Substances Control, Office of Historic Preservation, California Department of Transportation, District 7 (DOT)

State Reviewing Agency Comments

California Department of Transportation, District 7 (DOT)

Development Types

Other (Museum renovation and expansion with public recreational improve)

Local Actions

Master Plan

Project Issues

Aesthetics, Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Cumulative Effects, Drainage/Absorption, Energy, Flood Plain/Flooding, Geology/Soils, Greenhouse Gas Emissions, Growth Inducement, Hazards & Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Mandatory Findings of Significance, Mineral Resources, Noise, Population/Housing, Public Services, Recreation, Schools/Universities, Sewer Capacity, Solid Waste, Transportation, Tribal Cultural Resources, Utilities/Service Systems, Vegetation, Wetland/Riparian, Wildfire

Local Review Period Start

9/11/2023

Local Review Period End

10/26/2023

Attachments

Draft Environmental Document [Draft IS, NOI_NOA_Public notices, OPR Summary Form, Appx,]

1_OPR-Summary_Form F_for_Document_Submittal PDF 629 K 2 PDF 503 K

La Brea Tar Pits Master Plan Draft EIR_Sept 2023 PDF 16572 K

La Brea Tar Pits Master Plan Draft EIR_Sept 2023_Appendices PDF 89428 K

Los Angeles Times NOA_NOC (09-11-23) PDF 431 K NOA_La Brea Tar Pits MP Draft EIR (09-11-23) PDF 313 K

Notice of Completion [NOC] Transmittal form

NOC_La Brea Tar Pits MP Draft EIR (09-11-23)_fex PDF 328 K

State Comment Letters [Comments from state reviewing agencies]

2022020344_DOT comment PDF 399 K

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SCH-1
(cont'd)

2.2.1.1 *Response to Posting by California Governor’s Office of Planning and Research State Clearinghouse*

Comment No.	Response
SCH-1	The Draft EIR was received by the California Governor’s Office of Planning and Research State Clearinghouse and the public review period began on September 11, 2023. The Draft EIR, Draft EIR Appendices, Notice of Completion, Notice of Availability, and State Clearinghouse Summary Form were made available for public review at https://ceganet.opr.ca.gov/2022020344/3 for the full duration of the 45-day review period. No comments regarding the environmental effects of the project were included in the posting; therefore, no changes to the EIR were determined to be necessary in response to this comment.

2.2.2 Los Angeles County Metropolitan Transportation Authority



Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Metro

October 20, 2023

Leslie Negritto
Natural History Museums of Los Angeles County
900 Exposition Boulevard
Los Angeles, CA 90007

Sent by Email: lnegritto@nhm.org

RE: La Brea Tar Pits Master Plan Project
Notice of Availability of a Draft Environmental Impact Report (DEIR)

Dear Ms. Negritto:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed La Brea Tar Pits Master Plan Project (Project) located at 5801 Wilshire Boulevard in the County of Los Angeles. Metro's mission is to provide a world-class transportation system that enhances quality of life for all who live, work, and play within Los Angeles County (County). As the County's mass transportation planner, builder and operator, Metro is constantly working to deliver a regional system that supports increased transportation options and associated benefits, such as improved mobility options, air quality, health and safety, and access to opportunities.

Per Metro's area of statutory responsibility pursuant to sections 15082(b) and 15086(a) of the Guidelines for Implementation of the California Environmental Quality Act (CEQA: Cal. Code of Regulations, Title 14, Ch. 3), the purpose of this letter is to provide the County and the Natural History Museums of Los Angeles County (NHM) with specific detail on the scope and content of environmental information that should be included in the Environmental Impact Report (EIR) for the Project. In particular, this letter outlines topics regarding the Project's potential impacts on the under-construction Metro D Line Extension Section 1 and Metro bus facilities and services which should be analyzed in the EIR, and provides recommendations for mitigation measures as appropriate. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.¹

Metro is committed to coordinating with the County and NHM on the renovation of the La Brea Tar Pits campus, an important cultural and scientific resource for the Los Angeles region. In particular, we greatly appreciate the early consultation meetings held in 2022 with NHM staff, and look forward to

¹ See CEQA Guidelines section 15064.3(a); Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts In CEQA, December 2018, p. 19.

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October 20, 2023

future discussion and collaboration. In addition to the specific comments outlined below, Metro is providing the County and NHM with the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro right-of-way (ROW) and transit facilities, available at <https://www.metro.net/devreview>.

Project Description

The Project includes the renovation of the existing Page Museum and add a new one-story museum building toward the northwest. The Project would also add the following improvements to Hancock Park: a pedestrian path (improving pedestrian circulation within the project site), additional seating and rest areas, a Wilshire Gateway entry plaza at the southeastern corner of the site, a 6th Street Gateway entry plaza at the northwestern corner of the site, a pedestrian bridge over the Lake Pit, three pavilions with canopies, and new and enhanced recreation areas. Enhanced landscaping would also be provided, including native vegetation plantings and a garden bioswale to improve stormwater infiltration.

Recommendations for EIR Scope and Content

Transit Services and Facilities

The EIR should include information on existing and planned transit services and facilities in the vicinity of the Project. In particular, Metro's NextGen Bus Plan (completed in December 2021) should be used as a resource to identify bus stop locations and service frequency. For more information, visit the NextGen Bus Plan's website at: <https://www.metro.net/projects/nextgen/>

Bus Service Adjacency

1. Service: Metro Bus Line 20 operates on Wilshire Boulevard and Curson Avenue, adjacent to the Project. One Metro Bus stop is directly adjacent to the Project at Wilshire Boulevard and Curson Avenue. A second stop is located just to the west of the Project site, at Wilshire Boulevard and Spaulding Avenue. Other transit operators such as LADOT may provide service in the vicinity of the Project and should be consulted.
2. Impact Analysis: The EIR should analyze potential effects on Metro Bus service and identify mitigation measures as appropriate. Potential impacts may include impacts to transportation services, stops, and temporary or permanent bus service rerouting. Specific types of impacts and recommended mitigation measures to address them include, without limitation, the following:
 - a. Bus Stop Condition: The EIR should identify all bus stops on all streets adjacent to the Project site. During construction, NHM may either maintain the stop in its current condition and location, or temporarily relocate the stop consistent with the needs of Metro Bus operations. Temporary or permanent modifications to any bus stop as part of the Project, including any surrounding sidewalk area, must be Americans with Disabilities Act (ADA)-compliant and allow passengers with disabilities a clear path of travel between the bus stop and the Project. Once the Project is completed, NHM

Metro-1
(cont'd)

Metro-2

Metro-3

Metro-4

Metro-5

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must ensure any existing Metro bus stop affected by the Project is returned to its pre-Project location and condition, unless otherwise directed by Metro.

- b. Driveways: Driveways accessing parking and loading at the Project site should be located away from transit stops, and be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic to the greatest degree possible. Vehicular driveways should not be located in or directly adjacent to areas that are likely to be used as waiting areas for transit.
- c. Bus Stop Enhancements: Metro encourages the installation of enhancements and other amenities that improve safety and comfort for transit riders. These include benches, bus shelters, wayfinding signage, enhanced crosswalks and ADA-compliant ramps, pedestrian lighting, and shade trees in paths of travel to bus stops.
- d. Bus Operations Coordination: NHM shall coordinate with Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 not later than 30 days before the start of Project construction. Other municipal bus services may also be impacted and shall be included in construction outreach efforts.

Subway Adjacency

1. Operations: Metro is currently constructing Metro D Line Extension Section 1, with tunnels within Wilshire Boulevard right-of-way, adjacent to the Project site. When completed, the D Line will operate peak service as often as every four minutes in both directions. Trains may operate up to 24 hours a day, seven days a week in the tunnels adjacent to the Project. Currently, Metro D Line Extension Section 1 is forecasted to be completed and open for revenue service in 2025; this date is subject to change. Should construction for the Project overlap with Metro's construction activities for the D Line Extension, Metro kindly requests that the Project's construction traffic control plans be coordinated with Metro.
2. Impact Analysis: Due to the Project's proximity to the under-construction Metro D Line Extension Section 1 tunnels, the EIR must analyze potential effects on subway operations and identify mitigation measures as appropriate. Critical impacts that should be studied include (without limitation): impacts of Project construction and operation on the structural and systems integrity of subway tunnels; damage to subway infrastructure, including tracks; and to subway service.

The following provisions should be used to develop a mitigation measure that addresses these potential impacts:

- a. Technical Review: Not later than six months before start of construction, NHM shall submit to Metro the Project's architectural plans, engineering drawings and calculations, and construction work plans and methods, including any crane

↑ Metro-5
(cont'd)

Metro-6

Metro-7

Metro-8

Metro-9

Metro-10

Metro-11
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placement and radius, to evaluate any impacts to the under-construction Metro D Line Extension Section 1 tunnels infrastructure in relationship to the Project.

- b. Construction Safety: The construction and operation of the Project shall not disrupt the operation and maintenance activities of the Metro D Line Extension Section 1 or the structural and systems integrity of Metro's tunnels. During Project construction, NHM shall:
- Work in close coordination with Metro to ensure that structural integrity of the tunnels are not compromised by construction activities or permanent build conditions;
 - Notify Metro of any changes to demolition/construction activities that may impact the use of the ROW;
 - Permit Metro staff to monitor construction activity to ascertain any impact to the Metro D Line Extension Section 1
3. Advisories to Applicant: The Project's design team is encouraged to contact the Metro Development Review Team early in the design process to address potential impacts. NHM should also be advised of the following:
- Occupational Safety and Health Administration (OSHA) Requirements: Demolition, construction or excavation work in proximity to Metro right-of-way (ROW) with potential to damage subway tracks and related infrastructure may be subject to additional OSHA safety requirements.
 - Technical Review: Metro charges for staff time spent on engineering review and construction monitoring.
 - Right of Way (ROW) Entry Permit: For temporary or ongoing access to Metro ROW for demolition, construction, and/or maintenance activities, NHM shall complete Metro's Track Allocation process with Metro Rail Operations and obtain a Right of Entry Permit from Metro Real Estate. Approval for single tracking or a power shutdown, while possible, is highly discouraged; if sought, NHM shall apply for and obtain such approval not later than two months before the start of Project construction. NHM shall apply for and obtain approval for any special operations, including the use of a pile driver or any other equipment that could come in close proximity or encroach on the tunnels or related structures, not later than two months before the start of Project construction.
 - Cost of Impacts: NHM will be responsible for costs incurred by Metro resulting from Project construction/operation issues that cause delay or harm to Metro service delivery or infrastructure, including single-tracking or bus bridging around closures. NHM will also bear all costs for any noise mitigation required for the Project.

↑ Metro-11
(cont'd)

Metro-12

Metro-13

La Brea Tar Pits
Notice of Availability of DEIR – Metro Comments
October 20, 2023

Transit Supportive Planning: Recommendations and Resources

Considering the Project's proximity to the future Wilshire/Fairfax Station, Metro would like to identify the potential synergies associated with transit-oriented development:

1. Transit Connections and Access: Metro strongly encourages NHM to install Project features that help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the Project site and nearby destinations. These features include:
 - a. Walkability: The provision of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, enhanced crosswalks with ADA-compliant curb ramps, and other amenities along all public street frontages of the development site to improve pedestrian safety and comfort to access the bus stops at Wilshire/Curson and Wilshire/Spaulding.
 - b. Bicycle Use and Micromobility Devices: The provision of adequate short-term bicycle parking, such as ground-level bicycle racks, and secure, access-controlled, enclosed long-term bicycle parking for employees and visitors. Bicycle parking facilities should be designed with best practices in mind, including highly visible siting, effective surveillance, ease to locate, and equipment installation with preferred spacing dimensions, so bicycle parking can be safely and conveniently accessed. Similar provisions for micro-mobility devices are also encouraged.
2. First & Last Mile Access: Adopted in September 2021, Metro adopted a First/Last Mile Plan for Section 1 of the Purple Line Extension. This First/Last Mile Plan was developed with considerable stakeholder engagement and in partnership with the City and County. Metro encourages NHM to partner with the City and County to support implementation of improvements to the pedestrian and bicycle network connecting to Wilshire/Fairfax Station, as described in the First/Last Mile Plan. These improvements include, without limitation, a proposed bike lane on Wilshire Boulevard; an east-west bike facility on 6th Street; and ADA-compliant curb cuts at the corner of Wilshire/Curson.

In addition, Metro strongly encourages NHM to coordinate with the Los Angeles County Museum of Art (LACMA) to promote connectivity between the two museum campuses and linkages to Wilshire/Fairfax Station.

For reference, please review the Purple (D Line) Extension First Last Mile Plan available online at <https://www.metro.net/about/first-last/>.
3. Parking: Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements and the exploration of shared parking opportunities. These strategies could be pursued to reduce automobile-orientation in design and travel demand.
4. Wayfinding: Any temporary or permanent wayfinding signage with content referencing Metro services or featuring the Metro brand and/or associated graphics (such as Metro Bus or Rail

Metro-14

Metro-15

Metro-16

Metro-17

Metro-18

Metro-19

La Brea Tar Pits
Notice of Availability of DEIR – Metro Comments
October 20, 2023

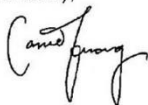
pictograms) requires review and approval by Metro's Signage and Environmental Graphic Design team.

5. Transit Pass Programs: Metro would like to inform NHM of Metro's employer transit pass programs, including the Annual Transit Access Pass (A-TAP), the Employer Pass Program (E-Pass), and Small Employer Pass (SEP) Program. These programs offer efficiencies and group rates that businesses can offer employees as an incentive to utilize public transit. For more information on these programs, please visit the programs' website at <https://www.metro.net/riding/eapp/>.

If you have any questions regarding this letter, please contact me by phone at 213.418.3484, by email at DevReview@metro.net, or by mail at the following address:

Metro Development Review
One Gateway Plaza
MS 99-22-1
Los Angeles, CA 90012-2952

Sincerely,



Cassie Truong
Senior Transportation Planner, Development Review Team
Transit Oriented Communities

Attachments and links:

- Adjacent Development Handbook: <https://www.metro.net/devreview>

▲ Metro-19
(cont'd)

Metro-20

Metro-21

2.2.2.1 Response to Letter from Los Angeles County Metropolitan Transportation Authority

Comment No.	Response
Metro-1	<p>The comment serves as an introduction to the comment letter and describes the project. The County would like to thank the commenter for participating in the public review process of the Draft EIR. A copy of this comment letter will be included in the Final EIR, which will be provided to the Board of Supervisors for review when the project is considered for approval. This is not a comment on the analysis contained in the EIR; therefore, no response is necessary.</p>
Metro-2	<p>The commenter requests that the EIR include information on existing and planned transit services in the study area, including future changes to transit service and bus stop locations in the study area as proposed in LA Metro's NextGen Bus Plan.</p> <p>Section 5.13.1.3 of the EIR discusses existing bus service in the study area provided by LA Metro, Los Angeles Department of Transportation (LADOT), and Antelope Valley Transit Authority, as well as the location of existing bus stops and a discussion of future LA Metro rail service. Through this Final EIR, the text of Section 5.13.1.3 has been revised as follows (added text shown in underline):</p> <p>There are three Los Angeles County Metropolitan Transportation Authority (Metro) bus routes that run on roads that parallel the project site.</p> <ul style="list-style-type: none"> Line 20 (Downtown Los Angeles – Westwood/Santa Monica via Wilshire Boulevard) runs between Downtown Los Angeles and Santa Monica on Wilshire Boulevard along the entire route between these two destinations. Service runs 7 days a week; the bus runs 24 hours, with 15-minute headways during daylight hours and 30-minute headways during overnight every day of the week. Stops near the project site are located at Wilshire/Spaulding and Wilshire/Curson for both directions of travel. As part of its NextGen Bus Plan, LA Metro proposes to merge Line 20 and 720 between Downtown Santa Monica and Downtown Los Angeles. <u>The new Line 20 would have 5-minute headways during weekday peak periods. Bus stop consolidation includes the removal of the Wilshire/Masselin bus stops approximately 750 feet east of the project site.</u> Line 217 (Hollywood/Vine Station – La Cienega Station via Hollywood Boulevard-Fairfax Avenue) runs between Los Angeles' Los Feliz and Baldwin Hills neighborhoods, on Vermont Avenue, Hollywood Boulevard, and Fairfax Avenue along the west side of the project site. Service runs 7 days a week; the bus runs on 12- to 15-minute headways for the majority of the day every day of the week, with longer headways at the beginning and end of service. Stops near the project site are located at Fairfax/6th and Fairfax/Wilshire for both directions of travel. <u>As part of its NextGen Bus Plan, LA Metro proposes to merge Lines 180, 181, 217, and 780; Line 217 would be discontinued south of La Cienega/Jefferson Station to Howard Hughes Center. The new Line 180 would have 7.5-minute headways during weekday peak periods. Bus stop consolidation is not proposed for this route.</u> Line 720 (Santa Monica – Downtown Los Angeles via Wilshire Boulevard) runs between Downtown Los Angeles and Santa Monica on Wilshire Boulevard along the entire route between these two destinations. Service runs 7 days a week; the bus runs on 5- to 10-minute headways for the majority of the day, with 15-minute headways during overnight hours of service. This is an express bus with limited stops, so the closest bus stops to the project site are at Wilshire/Cloverdale and at Wilshire/Crescent Heights. <u>As part of its NextGen Bus Plan, LA Metro proposes to merge Line 20 and 720 between Downtown Santa Monica and Downtown Los Angeles. The new Line 720 would continue to operate weekday peak periods with 10-minute headways, serving only between Downtown Los Angeles and Westwood.</u> <p>These revisions do not affect any conclusions or significance determinations provided in the Draft EIR. According to State CEQA Guidelines 15088.5:</p> <p>Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.</p> <p>As demonstrated above, the revised text included in Section 5.13.1.3 does not differ considerably from the original what was described in the Draft EIR. Instead, these revisions merely include further detail regarding the bus routes that operate near the project site. As no significant modifications have been made, recirculation of the EIR is not required.</p>
Metro-3	<p>The commenter requests that the EIR include a description of adjacent LA Metro bus service and bus stops, as well as other transit services in the project vicinity.</p> <p>Section 5.13.1.3 of the EIR details LA Metro and other local transit services. In addition, the transportation assessment report, provided as Appendix J to the EIR, includes a map of bus stops near the project site. No changes to the EIR were determined to be necessary in response to this comment.</p>

Comment No.	Response
Metro-4	<p>The commenter requests that the EIR include an analysis and mitigation of potential impacts to transit service and stops, as well as impacts from project construction.</p> <p>The EIR and the transportation assessment report (Appendix J) include an analysis and mitigation of potential impacts to transit service and stops resulting from site operation. Mitigation Measure TRA/mm-1.1 includes coordinating with LA Metro to improve local bus stops as follows:</p> <ul style="list-style-type: none"> Implement bus stop improvements such as shelters along Wilshire Boulevard bus stops that would be used by La Brea Tar Pits visitors. Coordinate with Metro and the City of Los Angeles to ensure that safe and comfortable pedestrian facilities (such as ADA curb ramps and continental crosswalks) are available between local bus stops and the project entrances, including at the Curson Avenue/ Wilshire Boulevard intersection. <p>As well, Mitigation Measure TRA/mm-4.3 includes coordinating with LADOT to explore the feasibility of implementing roadway improvements, which can mitigate effects on bus operations in the study area:</p> <ul style="list-style-type: none"> Signal timing at the built-out intersection of Curson Avenue/Wilshire Boulevard shall be regularly updated to optimize traffic signal timing. In addition, the weekday a.m. and p.m. peak period bus-only lanes on Wilshire Boulevard shall be extended to the weekday midday and weekend midday peak hours to improve bus operations through that intersection. <p>The EIR also includes Mitigation Measure TRA/mm-4.1, which requires a construction traffic management plan (CTMP), to be developed by the contractor, approved by the County and the City LADOT, and implemented to alleviate construction period impacts. The text of Mitigation Measure TRA/mm-4.1 has been revised as follows to incorporate LA Metro (added text shown in underline):</p> <p>A construction traffic management plan (CTMP) shall be developed by the contractor, approved by the County, and the City of Los Angeles Department of Transportation (LADOT), <u>Caltrans, and LA Metro</u>, and implemented to alleviate construction period impacts. The CTMP will include, but may not be limited to, the following restrictions:</p> <ul style="list-style-type: none"> Prohibition of construction worker parking on nearby residential streets. Prohibition of construction-related vehicles parking or staging on surrounding public streets. Prohibition of construction-related parking or staging on streets with bus service. Temporary pedestrian and vehicular traffic controls (i.e., flag persons) during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways. Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate. Scheduling of construction-related deliveries, haul trips, etc., shall occur outside the commuter peak hours to the extent feasible. <u>Avoidance of construction-related deliveries, haul trips, etc. from routing along congested local and state facilities, to the extent feasible.</u> <u>Relocation and accommodation (as needed) of adjacent bus stops and access, to the extent feasible.</u> <p>These revisions do not affect any conclusions or significance determinations provided in the Draft EIR. According to State CEQA Guidelines 15088.5:</p> <p>Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.</p> <p>As demonstrated above, the revised text in Mitigation Measure TRA/mm-4.1 does not differ considerably from the original measure that was described in the Draft EIR. Instead, these revisions merely include further detail and refinements to better achieve the goal of the measure, which is to require the County to prepare a thorough construction traffic management plan. As no significant modifications have been made, recirculation of the EIR is not required.</p>
Metro-5	<p>The commenter requests that the EIR include a description of adjacent bus stops and include mitigation of construction impacts to bus stops.</p> <p>The transportation assessment report, provided as Appendix J to the EIR, includes a map of bus stops near the project site. In addition, the EIR includes Mitigation Measure TRA/mm-4.1, which requires the development of a CTMP as described in response to comment Metro-4. No changes to the EIR were determined to be necessary in response to this comment.</p>
Metro-6	<p>The commenter requests that project driveways be designed to avoid effects on transit service and people accessing transit.</p> <p>The proposed driveways were analyzed as part of the transportation assessment report (Appendix J); driveways are not proposed on streets with transit service or bus stops. No changes to the EIR were determined to be necessary in response to this comment.</p>

Comment No.	Response
Metro-7	<p>The commenter requests that EIR's transportation impact analysis mitigate impacts through the installation of bus stop and pedestrian enhancements.</p> <p>Mitigation Measure TRA/mm-1.1 includes coordinating with LA Metro to improve local bus stops as follows:</p> <ul style="list-style-type: none"> • Improve pedestrian wayfinding between the planned Purple Line station, local bus stops, and La Brea Tar Pits. • Implement bus stop improvements such as shelters along Wilshire Boulevard bus stops that would be used by La Brea Tar Pits visitors. • Coordinate with Metro and the City of Los Angeles to ensure that safe and comfortable pedestrian facilities (such as ADA curb ramps and continental crosswalks) are available between local bus stops and the project entrances, including at the Curson Avenue/ Wilshire Boulevard intersection. <p>No changes to the EIR were determined to be necessary in response to this comment.</p>
Metro-8	<p>The commenter requests that the coordination occur with LA Metro before the start of project construction to address potential impacts to bus services.</p> <p>The EIR includes Mitigation Measure TRA/mm-4.1, which requires the development of a CTMP, to be developed by the contractor, approved by the County and the City of Los Angeles LADOT, and implemented to alleviate construction period impacts. The mitigation measure, with revisions, is provided in response to comment Metro-4. As revised in this Final EIR, this measure requires coordinating with LA Metro before the start of the project and consideration of construction activity near bus service.</p>
Metro-9	<p>The commenter requests that Metro would like to be coordinated with regarding the project's construction traffic control plans if project construction overlaps with construction of the Metro D Line Extension Section 1. The EIR includes Mitigation Measure TRA/mm-4.1, which requires the development of a CTMP, to be developed by the contractor, approved by the County and the City of Los Angeles LADOT, and implemented to alleviate construction period impacts. The mitigation measure, with revisions, is provided in response to comment Metro-4. As revised in this Final EIR, this measure requires coordinating with LA Metro before the start of the project.</p>
Metro-10	<p>The commenter indicates that, due to the project's proximity to the under-construction Metro D Line Extension Section 1 tunnels, the EIR should analyze potential effects on subway operations and identify mitigation measures, where appropriate.</p> <p>Considering the depths of the excavation anticipated for the foundation system of the project, and the depth of the Metro tunnel, significant effect on the Metro tunnel lining is not anticipated. Nevertheless, the County will continue close coordination with Metro regarding construction timing and activities. Further coordination is necessary to determine tolerance and complete the requested load analyses. The County will prepare a report with relevant geotechnical, structural and load details as well as an appropriate instrumentation program in coordination with Metro. No changes to the EIR were determined to be necessary in response to this comment.</p>
Metro-11	<p>The commenter requests that the County submit to Metro the project's architectural plans, engineering drawings and calculations, and construction work plans and methods, including any crane placement and radius, to evaluate any impacts to the under-construction Metro D Line Extension Section 1 tunnels infrastructure in relationship to the project.</p> <p>As the project design plans are further developed, the County will coordinate with Metro and submit the architectural plans, engineering drawings and calculations, and construction work plans and methods. The County is agreeable to Metro's request. Furthermore, the County will prepare a report with relevant geotechnical, structural and design details in coordination with Metro. No changes to the EIR were determined to be necessary in response to this comment.</p>
Metro-12	<p>The commenter indicates that the construction and operation of the project shall not disrupt the operation and maintenance activities of the Metro D Line Extension Section 1 or the structural and systems integrity of Metro's tunnels and requests that the County work in close coordination with Metro. Further, Metro details several coordination and notification efforts that are being requested.</p> <p>The County will continue to work with Metro to ensure that construction and operation of the project would not disrupt the operation and maintenance activities of the Metro Purple Line or the structural and systems integrity of the Purple Line subway tunnels and to implement the coordination and notification efforts outlined by Metro in this comment. No changes to the EIR were determined to be necessary in response to this comment.</p>
Metro-13	<p>The commenter provides several details on how Metro encourages communication with Metro and where coordination should occur. Specifics provided by the commenter indicate requirements of the Occupational Safety and Health Administration, guidance for requesting Metro technical review, and requirements for working in Metro's right of way.</p> <p>The County will continue to work with Metro and ensure that communication occurs between the agencies and that Metro is afforded appropriate technical review. Further, the County will adhere to all requirements of the Occupational Safety and Health Administration and other safety and permitting requirements. Further, the County will implement the requested coordination and notification efforts outlined by Metro in this comment. No changes to the EIR were determined to be necessary in response to this comment.</p>

Comment No.	Response
Metro-14	<p>The Metro letter provides a section that is introduced as “recommendations and resources”, which follows the specific comments on the EIR. This is the first comment in this supplemental section of the Metro letter; as indicated by Metro, these are not comments specifically on the EIR. In this section of the letter, the commenter identifies opportunities for the project to support transit use through strategies that improve the walking and bicycling environment along the project frontage, to/from the project, and at the project site.</p> <p>While the project site plan is currently conceptual, it provides for amenities that include, but are not limited to, shaded pedestrian pathways and pedestrian-oriented access points and gateways. In addition, Mitigation Measure TRA/mm-1.1 provides for improvements for people walking and bicycling to and from the site, including to adjacent transit stops. While some improvements would be provided on-site, others are off-site and would require coordination with external agencies such as LA Metro and LADOT. Improvements under Mitigation Measure TRA/mm-1.1 include:</p> <ul style="list-style-type: none"> • Provide facilities on-site to support bicycling to work, such as secure bike parking, showers, and lockers. • Provide and maintain secure on-site bicycle parking for visitors and monitor usage to determine if additional bicycle racks are needed. <ul style="list-style-type: none"> ○ Provide wayfinding signage directing bicyclists from the visitor entrances to where on-site bicycle parking is located. ○ Ensure bicycle parking is well lit and monitored by staff. • Coordinate with Metro to improve transit access and user comfort and encourage visitors to take local bus service or the future Purple Line extension to La Brea Tar Pits, through the following measures: <ul style="list-style-type: none"> ○ Improve pedestrian wayfinding between the planned Purple Line station, local bus stops, and La Brea Tar Pits. ○ Implement bus stop improvements such as shelters along Wilshire Boulevard bus stops that would be used by La Brea Tar Pits visitors. ○ Coordinate with Metro and the City of Los Angeles to ensure that safe and comfortable pedestrian facilities (such as ADA curb ramps and continental crosswalks) are available between local bus stops and the project entrances, including at the Curson Avenue/ Wilshire Boulevard intersection. • Coordinate with the City of Los Angeles to implement planned bikeways in the vicinity of the project site and contribute to the implementation of the bikeways. This includes planned bikeways along Wilshire Boulevard and 6th Street. <p>These improvements were already included in the EIR through Mitigation Measure TRA/mm-1.1; therefore, no changes to the EIR were determined to be necessary in response to this comment.</p>
Metro-15	<p>The Metro letter provides a section introduced as additional “recommendations and resources” which are supplemental to Metro’s comments on the EIR. In this section, the commenter requests the support of the County with implementation of various pedestrian and bicycle improvements, including a proposed bike lane on Wilshire Boulevard; an east-west bike facility on 6th Street, and ADA-compliant curb cuts at the corner of Wilshire/Curson, as described in the LA Metro First/Last Mile Plan for Section 1 of the Purple Line Extension. The EIR includes Mitigation Measure TRA/mm-1.1, which requires the County to coordinate with LA Metro and the City of Los Angeles to implement various bicycling- and walking-supportive improvements in the project vicinity. Therefore, no changes to the EIR were determined to be necessary in response to this comment.</p>
Metro-16	<p>The Metro letter provides a section introduced as additional “recommendations and resources” which are supplemental to Metro’s comments on the EIR. In this section, the commenter requests that the County should coordinate with the adjacent property (LACMA) to improve pedestrian connectivity between the campuses and the future Metro station.</p> <p>While this is not a comment specifically on the analysis contained in the EIR, it should be noted that coordination between the two properties would be conducted at the time of final site design. Further, the County will support efforts to improve pedestrian connectivity between the campuses and the future Metro station.</p>
Metro-17	<p>The Metro letter provides a section introduced as additional “recommendations and resources” which are supplemental to Metro’s comments on the EIR. In this section, the commenter provides a reference to the LA Metro Purple (D Line) Extension First Last Mile Plan.</p> <p>No response to this comment is required as it does not provide any specific comment on the CEQA analysis; therefore, no changes to the EIR were determined to be necessary in response to this comment.</p>

Comment No.	Response
Metro-18	<p>The commenter requests that strategies that support transit and walking through reduced or alternative parking arrangements such as shared parking be considered.</p> <p>While the overall museum square footage would increase with development of the new museum building, the project does not propose an increase in the on-site parking supply; the anticipated increase in visitors is anticipated to be accommodated by shared parking structures in the project vicinity. In addition, as part of Mitigation Measure TRA/mm-1.1, the County would be required to prepare and implement a Transportation Demand Management (TDM) Program to reduce museum employee and visitor vehicle trips and increase alternative modes such as walking, bicycling, public transit, and rideshare. This mitigation measure consists of strategies to reduce the vehicle demand of both employees and visitors to the site and increase walking, bicycling, and transit trips. No changes to the EIR were determined to be necessary in response to this comment.</p>
Metro-19	<p>The commenter requests that transit-oriented wayfinding be coordinated with and approved by LA Metro. Mitigation Measure TRA/mm-1.1 includes working with LA Metro to improve transit access and user comfort in the project vicinity, including improving pedestrian wayfinding between the planned Purple Line station, local bus stops, and La Brea Tar Pits. No changes to the EIR were determined to be necessary in response to this comment.</p>
Metro-20	<p>The commenter provides information regarding opportunities to provide transit passes for museum employees through various LA Metro programs.</p> <p>Through Mitigation Measure TRA/mm-1.1, the County would be required to prepare and implement a TDM Program to reduce museum employee and visitor vehicle trips and increase alternative modes such as walking, bicycling, public transit, and rideshare. This mitigation measure includes the provision of subsidized employee transit passes, which could be offered through LA Metro's programs. No changes to the EIR were determined to be necessary in response to this comment.</p>
Metro-21	<p>The comment serves as a closing remark. No changes to the EIR were determined to be necessary in response to this closing remark. No changes to the EIR were determined to be necessary in response to this closing comment. The County appreciates Metro's attention to this important project.</p>

2.2.3 California Department of Transportation, District 7

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 7
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 266-3562
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



Making Conservation
a California Way of Life

October 26, 2023

Leslie Negritto
County of Los Angeles
900 Exposition Blvd
Los Angeles, CA 90007

RE: La Brea Tar Pits Master Plan Project -
Draft Environmental Impact Report
(DEIR)
SCH # 2022020344
Vic. I-10, SR-2/PM LA 8.087, 1.362
GTS # 07-LA-2022-04309

Dear Leslie Negritto:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. The proposed project would renovate the existing George C. Page Museum and add a new one-story museum building, increasing the total museum square footage from 63,000 gsf to 105,000 gsf. The new building would have additional space for exhibits, classrooms, and laboratories. The existing parking lot would be shifted to the northeast and add up to 5-10 additional parking spaces. Within Hancock Park, the project would add a pedestrian path, enhanced recreation areas, additional seating and rest areas, and new site entry plazas at Wilshire Blvd/S. Curson Ave. and on W. 6th Street. Phased construction would occur over approximately 7 to 10 years. The County of Los Angeles is the Lead Agency under the California Environmental Quality Act (CEQA).

Caltrans-1

The closest state facilities are the I-10, and SR-2 (Santa Monica Blvd). After reviewing the project's DEIR, Caltrans has the following comments:

- The Los Angeles County Bicycle Master Plan states that their benefits model predicts that by 2030, bike ridership will increase up to 246% in the Westside Planning area. Given this trend, Caltrans encourages the Lead Agency to consider any reduction in vehicle speeds to benefit pedestrian and bicyclist safety, as there is a direct link between impact speeds and the likelihood of fatality or serious injury. The most effective methods to reduce pedestrian and bicyclist exposure to vehicles is through physical design and geometrics.
 - These methods include the construction of physically separated facilities such as Class IV bikeways, wide sidewalks, curb extensions, pedestrian refuge islands, landscaping, street furniture, and reductions in crossing

Caltrans-2

*"Provide a safe and reliable transportation network that serves all people
and respects the environment."*

Leslie Negritto
October 26, 2023
Page 2 of 3

distances through roadway narrowing. Visual indicators such as, pedestrian and bicyclist warning signage, flashing beacons, crosswalks, signage, and striping should be used in addition to physical design improvements to indicate to motorists that they can expect to see and yield to people walking or riding bikes.

Caltrans-2
(cont'd)

- In accordance with the Los Angeles County 2035 General Plan, the Metro Purple (D Line) Extension Transit Project is currently undergoing construction and will service riders to the Wilshire/Fairfax Station by 2040. To increase ridership and lower total VMT trips, Caltrans recommends reducing the amount of proposed car parking.

Caltrans-3

- Research looking at the relationship between land-use, parking, and transportation indicates that the amount of car parking supplied encourages driving and can undermine a project's ability to encourage public transit and active modes of transportation. For any project to better promote public transit and reduce vehicle miles traveled, we recommend the implementation of Transportation Demand Management (TDM) strategies as an alternative to building car parking.

- The site is located between several Caltrans Active Transportation (CAT) plans where needs have been identified to for walking and bicycling trip potential. In accordance with the planned Metro Wilshire/Fairfax Station, Caltrans recommends that the Lead Agency works with the city on implementing Class IV bike lanes along the main arterial roads to create connected corridors for bike and pedestrian visitors. For more information regarding CAT plans, please see:

Caltrans-4

<https://storymaps.arcgis.com/stories/835bb16c4e3141f2b4f3e6dae7880fd3>

- For the duration of the construction period, Caltrans recommends the following:
 - Work with Caltrans Office of Permits, Multi-Modal Unit, for a designated truck route for construction trucks to transport construction equipment to and from the construction sites.
 - Construction vehicles/equipment should use alternative routes to avoid congested state facilities, especially during peak hours.
 - Cover construction trucks with tarpaulin to avoid debris spillage onto State facilities.
 - Inform Caltrans of any additional impacts to the I-10 ramps should it occur during the construction phase.

Caltrans-5

"Provide a safe and reliable transportation network that serves all people and respects the environment."

Leslie Negritto
October 26, 2023
Page 3 of 3

As a reminder, any transportation of heavy construction equipment and/or materials that requires the use of oversized transport vehicles on State Highways will need a Caltrans transportation permit. Caltrans recommends that the Project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause issues on any State facilities, please submit a construction traffic control plan detailing these issues for Caltrans' review.

Caltrans-6

If you have any questions, please feel free to contact Jaden Oloresisimo, the project coordinator, at Jaden.Oloresisimo@dot.ca.gov and refer to GTS # 07-LA-2022-04309.

Caltrans-7

Sincerely,

Anthony Higgins for

MIYA EDMONSON
LDR/CEQA Branch Chief

cc: State Clearinghouse

*"Provide a safe and reliable transportation network that serves all people
and respects the environment."*

2.2.3.1 Response to Letter from California Department of Transportation, District 7

Comment No.	Response
Caltrans-1	<p>The comment serves as an introduction to the comment letter and describes the project. The County would like to thank the commenter for participating in the public review process of the Draft EIR. A copy of this comment letter will be included in the Final EIR, which will be provided to the Board of Supervisors for review when the project is considered for approval. This is not a comment on the analysis contained in the EIR; therefore, no response is necessary.</p>
Caltrans-2	<p>The commenter requests that strategies to reduce speeds and accommodate bicyclists and pedestrians, including visual indicators and physically separated walking and bicycling facilities, be included in the project. The transportation assessment report, prepared by Kittelson & Associates in August 2022 and provided as Appendix J to the EIR, reviewed and provided recommendations to accommodate and improve pedestrian, bicycle, and transit access in the study area. These recommendations, which were incorporated into Mitigation Measure TRA/mm-1.1, include:</p> <ul style="list-style-type: none"> Coordinate with Metro to improve transit access and user comfort and encourage visitors to take local bus service or the future Purple Line extension to La Brea Tar Pits, through the following measures: <ul style="list-style-type: none"> Improve pedestrian wayfinding between the planned Purple Line station, local bus stops, and La Brea Tar Pits. Implement bus stop improvements such as shelters along Wilshire Boulevard bus stops that would be used by La Brea Tar Pits visitors. Coordinate with Metro and the City of Los Angeles to ensure that safe and comfortable pedestrian facilities (such as ADA curb ramps and continental crosswalks) are available between local bus stops and the project entrances, including at the Curson Avenue/ Wilshire Boulevard intersection. Coordinate with the City of Los Angeles to implement planned bikeways in the vicinity of the project site and contribute to the implementation of the bikeways. This includes planned bikeways along Wilshire Boulevard and 6th Street. <p>Through Mitigation Measure TRA/mm-1.1, coordinating would be required with LA Metro and the City of Los Angeles in order to accommodate facilities in the study area that would improve walking and bicycling conditions. As the recommendation is consistent with the EIR, no changes to the EIR were determined to be necessary in response to this comment.</p>
Caltrans-3	<p>The commenter requests that the amount of proposed car parking be reduced and TDM strategies to reduce vehicle demand be implemented. While the overall museum square footage would increase, the project does not propose an increase in the on-site parking supply. In addition, Mitigation Measure TRA/mm-1.1 would require the preparation and implementation of a TDM Program to reduce museum employee and visitor vehicle trips and increase alternative modes such as walking, bicycling, public transit, and rideshare. This mitigation measure consists of strategies to reduce the vehicle demand of both employees and visitors to the site and increase walking, bicycling, and transit trips. As the comment is consistent with the recommendations of the EIR, no changes to the EIR were determined to be necessary in response to this comment.</p>
Caltrans-4	<p>The commenter requests that the bicycle facilities be planned and implemented in the project area in coordination with the City of Los Angeles. Mitigation Measure TRA/mm-1.1 of the EIR provides for the following:</p> <ul style="list-style-type: none"> Coordinate with the City of Los Angeles to implement planned bikeways in the vicinity of the project site and contribute to the implementation of the bikeways. This includes planned bikeways along Wilshire Boulevard and West 6th Street. <p>With implementation of this mitigation measure, coordinating with the City of Los Angeles would occur to ensure bicycle facilities in the project area are implemented, as recommended by Caltrans. No changes to the EIR were determined to be necessary in response to this comment.</p>

Comment No.	Response
Caltrans-5	<p>The commenter requests coordination with Caltrans during project construction occur to avoid effects on state facilities.</p> <p>The EIR includes Mitigation Measure TRA/mm-4.1, which requires the development of a CTMP, to be developed by the contractor, approved by the County and LADOT, and implemented to alleviate construction period impacts. The text of Mitigation Measure TRA/mm-4.1 has been revised in this Final EIR as follows to include the recommendations of Caltrans (added text shown in underline):</p> <p>A construction traffic management plan (CTMP) shall be developed by the contractor, approved by the County, and the City of Los Angeles Department of Transportation (LADOT), <u>Caltrans, and LA Metro</u>, and implemented to alleviate construction period impacts. The CTMP will include, but may not be limited to, the following restrictions:</p> <ul style="list-style-type: none"> • Prohibition of construction worker parking on nearby residential streets. • Prohibition of construction-related vehicles parking or staging on surrounding public streets. • <u>Prohibition of construction-related parking or staging on streets with bus service.</u> • Temporary pedestrian and vehicular traffic controls (i.e., flag persons) during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways. • Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate. • Scheduling of construction-related deliveries, haul trips, etc., shall occur outside the commuter peak hours to the extent feasible. • <u>Avoidance of construction-related deliveries, haul trips, etc. from routing along congested local and state facilities, to the extent feasible.</u> • <u>Relocation and accommodation (as needed) of adjacent bus stops and access, to the extent feasible.</u> <p>These revisions do not affect any conclusions or significance determinations provided in the Draft EIR. According to State CEQA Guidelines 15088.5:</p> <p>Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.</p> <p>As demonstrated above, the revised text in Mitigation Measure TRA/mm-4.1 does not differ considerably from the original measure that was described in the Draft EIR. Instead, these revisions merely include further detail and refinements to better achieve the goal of the measure, which is to require the County to prepare a thorough construction traffic management plan. As no significant modifications have been made, recirculation of the EIR is not required.</p>
Caltrans-6	<p>The commenter requests coordination with Caltrans during project construction, including application for a Caltrans transportation permit (if required). In addition, the commenter requests that construction effects do not occur on state facilities through implementation of a construction traffic control plan.</p> <p>The EIR includes Mitigation Measure TRA/mm-4.1, which requires the development of a CTMP, to be developed by the contractor, approved by the County and the LADOT, and implemented to alleviate construction period impacts. The text of Mitigation Measure TRA/mm-4.1 has been revised in this Final EIR as follows to include consideration of construction activities along state facilities (added text shown in underline):</p> <p>A construction traffic management plan (CTMP) shall be developed by the contractor, approved by the County, and the City of Los Angeles Department of Transportation (LADOT), <u>Caltrans, and LA Metro</u>, and implemented to alleviate construction period impacts. The CTMP will include, but may not be limited to, the following restrictions:</p> <ul style="list-style-type: none"> • Prohibition of construction worker parking on nearby residential streets. • <u>Prohibition of construction-related vehicles parking or staging on surrounding public streets.</u> • Prohibition of construction-related parking or staging on streets with bus service. • Temporary pedestrian and vehicular traffic controls (i.e., flag persons) during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways. • Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate. • Scheduling of construction-related deliveries, haul trips, etc., shall occur outside the commuter peak hours to the extent feasible. • <u>Avoidance of construction-related deliveries, haul trips, etc. from routing along congested local and state facilities, to the extent feasible.</u> • <u>Relocation and accommodation (as needed) of adjacent bus stops and access, to the extent feasible.</u> <p>These revisions do not affect any conclusions or significance determinations provided in the Draft EIR. According to State CEQA Guidelines 15088.5:</p> <p>Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.</p> <p>As demonstrated above, the revised text in Mitigation Measure TRA/mm-4.1 does not differ considerably from the original measure that was described in the Draft EIR. Instead, these revisions merely include further detail and refinements to better achieve the goal of the measure, which is to require the County to prepare a thorough construction traffic management plan. As no significant modifications have been made, recirculation of the EIR is not required.</p>

Comment No.	Response
Caltrans-7	The comment serves as a closing remark. No changes to the EIR were determined to be necessary in response to this closing comment. The County appreciates Caltrans' attention to this important project.