

## 2.4 PUBLIC COMMENTS AND RESPONSES


The following members of the public have submitted comments on the Draft EIR.

**Table 2.4-1. Public Comment Documents Received**

Respondent	Code	Page
<b>Natalia Bell</b> Comment card received: September 30, 2023	NB	2.4-3
<b>Jonathan Bennett</b> Comment card received: September 30, 2023	JB	2.4-5
<b>Hannah Flynn</b> Comment card received: September 30, 2023	HF	2.4-9
<b>Robert Flynn</b> Comment card received: September 30, 2023	RF	2.4-12
<b>Kevin Glynn</b> Comment card received: September 30, 2023	KG	2.4-14
<b>Cheryl Harrison</b> Comment card received: September 30, 2023	CH	2.4-16
<b>David Seidel</b> Comment card received: September 30, 2023	DS	2.4-18
<b>Alexander Wikstrom</b> Comment card received: September 30, 2023	AW	2.4-20
<b>Jodi Dybala</b> Letter dated: October 1, 2023	JD	2.4-22
<b>Michelle Pesce</b> Letter dated: October 2, 2023	MP	2.4-24
<b>Will Tentindo</b> Letter dated: October 2, 2023	WT	2.4-26
<b>Miriyam Glazer</b> Letter dated: October 5, 2023	MG	2.4-29
<b>Marcia Lansford</b> Letter dated: October 5, 2023	ML	2.4-31
<b>Deatra Yatman</b> Letter dated: October 9, 2023	DY	2.4-33
<b>Lucy Bradley</b> Letter dated: October 10, 2023	LB	2.4-35
<b>Celine Burk</b> Letter dated: October 10, 2023	CB	2.4-37
<b>McCall Jones</b> Letter dated: October 10, 2023	MCJ	2.4-39
<b>Hadas Laureano</b> Letter dated: October 10, 2023	HL	2.4-41
<b>Elwarder Silas</b> Letter dated: October 10, 2023	ES	2.4-43
<b>Angela Bradshaw</b> Letter dated: October 11, 2023	AB	2.4-45
<b>Nancy Schwartz</b> Letter dated: October 11, 2023	NS	2.4-47
<b>Paula Waxman</b> Letter dated: October 11, 2023	PW	2.4-49

Respondent	Code	Page
<b>Sandra Dashiel</b> Letter dated: October 25, 2023	SD	2.4-51
<b>Joanne D'Antonio</b> Letter dated: October 26, 2023	JDA	2.4-55
<b>Marianne King</b> Letter dated: October 26, 2023	MK	2.4-63
<b>Ann Rubin</b> Letter dated: October 26, 2023	AR	2.4-74
<b>Lois DeArmond</b> Letter dated: October 27, 2023	LDA	2.4-78

## 2.4.1 Natalia Bell



**COMMENT CARD**

☒ YES, I would like to stay up to date on this project.

NAME Natalia Bell

AFFILIATION (if applicable) \_\_\_\_\_

COMMENTS:

We value this green space  
and want to see it maintained,  
accessible, and educative throughout  
the construction process. Please  
keep green space. Please utilize  
native plants.

NB-1


NB-2

8

### 2.4.1.1 Response to Letter from Natalia Bell

Comment No.	Response
NB-1	<p>The commenter requests that the green space present on the project site be maintained, and states that it should remain accessible during project construction.</p> <p>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.</p> <p>As discussed in EIR Section 5.12, Recreation, implementation of the project would not impede public access to Hancock Park and impacts to recreation would be less than significant. While the project would not expand or increase the amount of area dedicated to existing passive recreational uses, it would include improvements to the existing recreational areas and outdoor open spaces through modification of the existing pedestrian pathways into a continuous paved pedestrian path linking the existing elements of the site, including the Central Green. The project would also add a children's play area, picnic areas, and other new passive recreational amenities, such as seating areas and viewing points. While closure of portions of the park will be required in order to implement the park improvements while protecting the public, a construction sequencing plan will be developed for the purpose of maintaining public access to portions of the park throughout construction.</p> <p>Further, it should be noted that the vast amount of parkland provided by the 13-acre Hancock Park would continue to serve as a park facility with implementation of the project. The proposed Master Plan seeks to retain and enhance most of the valuable open space and passive park orientation of the site. Additionally, the County will be recommending approval of Refined Alternative 3 of the Master Plan. This variation would adjust the footprint of the project to reduce the new museum building's contact with the Page Museum and would expand the size of the Central Green. See <b>MR-1, Preferred Alternative</b>, for further information regarding the County's preferred alternative. No changes to the EIR were determined to be necessary in response to this comment.</p>
NB-2	<p>The commenter requests that native plants be used in the project's design.</p> <p>While this is not a comment specifically on the analysis contained in the EIR, it should be noted that native species are prioritized in the plant palette and have been incorporated into the project design where appropriate. The plant palette was developed 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 environmental analysis contained in EIR Section 5.3, Biological Resources, is an accurate assessment of the environmental impacts regarding vegetation removal. Furthermore, any visual impacts related to vegetation removal is appropriately discussed within EIR Section 5.1, Aesthetics, which concluded a less than significant impact. See <b>MR-3, Use of Native Plants and Vegetation</b>, for further information. No changes to the EIR were determined to be necessary in response to this comment.</p>

## 2.4.2 Jonathan Bennett



**COMMENT CARD**

☒ YES, I would like to stay up to date on this project.

NAME Jonathan Bennett

AFFILIATION (if applicable) \_\_\_\_\_

COMMENTS: I grew up and still live exactly one mile from Hancock Park. My interest is local, even parochial. I want the park to be a beautiful <sup>usable</sup> location for our park-starved local residents. Some of the proposals featuring the removal of mature trees along Ogden and 6th Street concern me: you don't remove mature trees during global warming! I abhor <sup>the possible</sup> destruction of the ginkgo tree

JB-1  
JB-2  
JB-3

in the atrium of the Page Museum;  
this is the finest tree in the park.  
It is an ice-age tree. it belongs  
here. If it must be relocated from  
the atrium it should be replanted  
nearby. It will be logistically  
difficult (and expensive) but to do  
any less would be an act of  
vandalism.

Thank you for the opportunity  
to comment.

JB-3  
(cont'd)

JB-4

## 2.4.2.1 Response to Letter from Jonathan Bennett


Comment No.	Response
JB-1	<p>The commenter requests that Hancock Park remain a usable park destination for local residents. 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.</p> <p>As discussed in EIR Section 5.12, Recreation, implementation of the project would not impede public access to Hancock Park and impacts to recreation would be less than significant. While the project would not expand or increase the amount of area dedicated to existing passive recreational uses, it would include improvements to the existing recreational areas and outdoor open spaces through modification of the existing pedestrian pathways into a continuous paved pedestrian path linking the existing elements of the site, including the Central Green. The project would also add a children's play area, picnic areas, and other new passive recreational amenities, such as seating areas and viewing points.</p> <p>Further, it should be noted that the vast amount of parkland provided by the 13-acre Hancock Park would continue to serve as a park facility with implementation of the project. The proposed Master Plan seeks to retain and enhance most of the valuable open space and passive park orientation of the site. Additionally, the County will be recommending approval of Refined Alternative 3 of the Master Plan. This variation adjusts the footprint of the project to reduce the new museum building's contact with the Page Museum and will expand the size of the Central Green. See <b>MR-1, Preferred Alternative</b>, for further information regarding the County's preferred alternative. No changes to the EIR were determined to be necessary in response to this comment.</p>
JB-2	<p>The commenter states that the mature trees present on the project site should not be removed. 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 exact trees to be removed through implementation of the project have not yet been determined. 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, the County is planning to remove diseased or unhealthy trees from the park with implementation of the project. Newly planted trees would be selected for resilience to disease and with consideration for their ability to create shaded areas at the park. In addition, retention of some trees may not be possible due to several issues related to feasibility of retention. These include the excavation requirements for construction of the building and the relative proximity of the trees to the new building location, planned park accessibility improvements, and fire access requirements. While there may be short term reductions to the amount of available shade at the project site, this loss will be recouped once the newly planted trees grow and mature.</p> <p>The proposed removal of trees at the La Brea Tar Pits site is not considered a significant impact on the environment. The environmental analysis contained in EIR Section 5.3, Biological Resources, is an accurate assessment of the potential for significant environmental impacts regarding tree and vegetation removal. Furthermore, any visual impacts related to tree removal is appropriately discussed within EIR Section 5.1, Aesthetics. 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. Refer to <b>MR-2, Impacts to Native and Mature Trees</b>, for further information. No changes to the EIR were determined to be necessary in response to this comment.</p>
JB-3	<p>The comment requests retention of the Ginkgo tree in the atrium of the Page Museum. The Ginkgo biloba tree proposed to be removed is not native to North America; this type of tree did not grow here in the Pleistocene (Ice Age). Similarly, most of the plants currently in the atrium are exotic species that are representative of much older geologic periods. The addition of plant species that are more representative of the Pleistocene in the atrium would be supportive of the project's education objectives and would aid in public understanding of the Pleistocene period.</p> <p>It should be noted that the County will be recommending approval of Refined Alternative 3 of the Master Plan. 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. One of these refinements is keeping the atrium open and as a garden. The atrium would continue to have an open feel and include significant vegetation. Native vegetation would be prioritized. Relocation of the Ginkgo tree is not feasible due to its size.</p> <p>See <b>MR-1, Preferred Alternative</b>, for further information regarding the County's preferred alternative. As discussed in response to comment JB-2, the County is prioritizing the protection of as many trees as possible, while also meeting the budgetary and design needs for the project. However, many trees would not be able to be retained due to feasibility of retention. Also, some trees will be removed because they are not consistent with the educational objectives of the project. As discussed above, the new plantings in the atrium would be more representative of the species present during Pleistocene period in North America. The County would prefer to existing Ginkgo specimen as Ginkgo biloba is not native to North America, nor was it present in the region during the Pleistocene period. No changes to the EIR were determined to be necessary in response to this comment.</p>

<b>Comment No.</b>	<b>Response</b>
JB-4	The commenter expresses an appreciation for the opportunity to comment. This is not a comment on the analysis contained in the EIR; therefore, a response is not required and no changes to the EIR were determined to be necessary in response to this comment.

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### 2.4.3 Hannah Flynn



**COMMENT CARD**

☒ YES, I would like to stay up to date on this project.

NAME Hannah Flynn

AFFILIATION (if applicable) neighbor, recent MLA grad (USC)

COMMENTS: To start with my favorites. I love:

1. the outdoor classroom - it looks comfortable and well-designed to give a close look at the fascinating paleontological work being done here.
2. the tar bar! there isn't much nightlife in the area. I think the hilltop position will feel special. Please keep the name Tar Bar because it's hilarious and I think a sense of humor about the tar pits is integral to the sense of place here already (the mammoth figure drawing in tar (please keep this), the tar-covered cones labeled "icky" + "goey" covering emergent tar seeps. →

HF-1

the dinosaur figure someone used to attach to a tree). Love tar bar.

• I like the shaded front entrance.

HF-1  
(cont'd)

• I am very concerned about retaining access to the portion of the hill adjacent to the green. I come to this park multiple times per week to walk my dog + sit there every time. I have talked to fellow park goers about the plan to cut into it and they're all dismayed.

HF-2

• I am also concerned about specific existing trees: all trees on the hill (vital for shade + atmosphere) facing the green, and all mature natives. Others are still important - in general, it is a waste of time, shade, + carbon emissions to cut down mature trees - but they are not vital like the first two categories.

HF-3


• Finally, I'm concerned about losing existing native plant shrubs. They are used as habitat by many birds, insects, + rabbits. It's also a degree of biodiversity that's hard to find in the immediate area - vital for reshaping LA's sense of place in a biodiversity crisis.

HF-4

### 2.4.3.1 Response to Letter from Hannah Flynn

Comment No.	Response
HF-1	<p>The commenter lists features of the project that they approve of, including the outdoor classroom, the Tar Bar, and the redesigned front entrance.</p> <p>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, a response is not required and no changes to the EIR were determined to be necessary in response to this comment.</p>
HF-2	<p>The commenter expresses concern with the potential for the project to reduce the recreational capacity and accessibility of the hill to the west of the Page Museum.</p> <p>As discussed in EIR Section 5.12, Recreation, implementation of the project would not impede public access to Hancock Park and impacts to recreation would be less than significant. While the project would not expand or increase the amount of area dedicated to existing passive recreational uses, it would include improvements to the existing recreational areas and outdoor open spaces through modification of the existing pedestrian pathways into a continuous paved pedestrian path linking the existing elements of the site, including the Central Green. The project would also add a children's play area, picnic areas, and other new passive recreational amenities, such as seating areas and viewing points.</p> <p>Further, it should be noted that the vast amount of parkland provided by the 13-acre Hancock Park would continue to serve as a park facility with implementation of the project. The proposed Master Plan seeks to retain and enhance most of the valuable open space and passive park orientation of the site. Additionally, the County will be recommending approval of Refined Alternative 3 of the Master Plan. This variation adjusts the footprint of the project to reduce the new museum building's contact with the Page Museum and also expands size the Central Green. See <b>MR-1, Preferred Alternative</b>, for further information regarding the County's preferred alternative. No changes to the EIR were determined to be necessary in response to this comment.</p>
HF-3	<p>The comment expresses concern regarding the proposed removal of existing trees on the project site. 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 exact trees to be removed through implementation of the project have not yet been determined. 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, the County is planning to remove diseased or unhealthy trees from the park with implementation of the project. Newly planted trees would be selected for resilience to disease and with consideration for their ability to create shaded areas at the park. In addition, retention of some trees may not be possible due to several issues related to feasibility of retention. These include the excavation requirements for construction of the building and the relative proximity of the trees to the new building location, planned park accessibility improvements, and fire access requirements. While there may be short term reductions to the amount of available shade at the project site, this loss will be recouped once the newly planted trees grow and mature.</p> <p>The proposed removal of trees at the La Brea Tar Pits site is not considered a significant impact on the environment. The environmental analysis contained in EIR Section 5.3, Biological Resources, is an accurate assessment of the potential for significant environmental impacts regarding tree and vegetation removal. Furthermore, any visual impacts related to tree removal is appropriately discussed within EIR Section 5.1, Aesthetics. 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. Refer to <b>MR-2, Impacts to Native and Mature Trees</b>, for further information. No changes to the EIR were determined to be necessary in response to this comment.</p>
HF-4	<p>The comment expresses concern regarding the proposed removal of existing native shrubs on the project site. It should be noted that native species are prioritized in the plant palette and have been incorporated into the project design where appropriate. The plant palette was developed based on the native vegetation of the Los Angeles Basin and was informed by research gathered from the La Brea Tar Pits fossil record. While removal of native vegetation can be significant, depending on the context, the proposed removal of existing native vegetation at the La Brea Tar Pits site is not a significant impact on the environment. The environmental analysis contained in EIR Section 5.3, Biological Resources, is an accurate assessment of the potential for significant environmental impacts regarding native vegetation removal. Furthermore, any visual impacts related to tree removal is appropriately discussed within EIR Section 5.1, Aesthetics. See <b>MR-3, Use of Native Plants and Vegetation</b>, for further information. No changes to the EIR were determined to be necessary in response to this comment.</p>

## 2.4.4 Robert Flynn



COMMENT CARD

☒ YES, I would like to stay up to date on this project.

NAME ROBERT FLYNN

AFFILIATION (if applicable) Owner of a duplex in area since 1989

COMMENTS:

- Like the idea of a true entry.
- Really like the idea of the Tar Bar. Seems like something that the local community would enjoy.
- Think the idea of a sandy right next to the tar pits is okay. It's not water; a tar pit not a lake. It smells. It's not an enjoyable smell to hang out around.


My main comment is that this is above all a neighborhood park, so the main driver should be preserving that - the grass hill, the shade trees, etc - not making this a tourist destination

RF-1  
RF-2  
RF-3

### 2.4.4.1 Response to Letter from Robert Flynn

Comment No.	Response
RF-1	<p>The commenter lists features of the project that they approve of, including the Tar Bar and the redesigned front entrance.</p> <p>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, a response is not required and no changes to the EIR were determined to be necessary in response to this comment.</p>
RF-2	<p>The commenter expresses their concern regarding the proposed seating next to the tar pits, as the odors from the pits may make the seating unenjoyable.</p> <p>The odors emitted from the tar pits are an existing condition of the project site. As described in EIR Section 5.2, Air Quality and Greenhouse Gas, implementation of the proposed project would not result in a significant impact related to the generation of adverse odors. Furthermore, the project would not exacerbate any existing issues associated with the odor generation of the site. However, the County will take this comment under advisement. No changes to the EIR were determined to be necessary in response to this comment.</p>
RF-3	<p>The comment expressed a concern regarding the reduction of usable open space in Hancock Park. As discussed in EIR Section 5.12, Recreation, implementation of the project would not impede public access to Hancock Park and impacts to recreation would be less than significant. While the project would not expand or increase the amount of area dedicated to existing passive recreational uses, it would include improvements to the existing recreational areas and outdoor open spaces through modification of the existing pedestrian pathways into a continuous paved pedestrian path linking the existing elements of the site, including the Central Green. The project would also add a children's play area, picnic areas, and other new passive recreational amenities, such as seating areas and viewing points.</p> <p>Further, it should be noted that the vast amount of parkland provided by the 13-acre Hancock Park would continue to serve as a park facility with implementation of the project. The project seeks to retain and enhance most of the valuable open space and passive park orientation of the site. Additionally, it is worth noting that the County will be recommending approval of Refined Alternative 3 of the Master Plan. This variation adjusts the footprint of the project to reduce the new museum building's contact with the Page Museum and expands the size of the Central Green. See <b>MR-1, Preferred Alternative</b>, for further information. No changes to the EIR were determined to be necessary in response to this comment.</p>

## 2.4.5 Kevin Glynn

  
**COMMENT CARD**

☐ YES, I would like to stay up to date on this project.

NAME Kevin Glynn

AFFILIATION (if applicable) Resident

COMMENTS:  
Need A dog  
PARK!

|  
KG-1  
|

### **2.4.5.1 Response to Letter from Kevin Glynn**

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<b>Comment No.</b>	<b>Response</b>
KG-1	The commenter requests that a dog park be incorporated into the project design. 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. As described in Chapter 3, Project Description, a dog park is identified as a possible use considered by the Master Plan and the analysis contained in the EIR (see pages 3-8 and 3-13 in Volume II of the Final EIR). The County can approve this use at the project site, consistent with the concept identified in the EIR. No changes to the EIR were determined to be necessary in response to this comment.

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## 2.4.6 Cheryl Harrison

Addendum



### COMMENT CARD

☒ YES, I would like to stay up to date on this project.

NAME Cheryl Harrison

AFFILIATION (if applicable) Yes my Great Uncle James Allen worked here for years.

COMMENTS: Happy to see the site development since he was apart of The's establishment

CH-1




### **2.4.6.1 Response to Letter from Cheryl Harrison**

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<b>Comment No.</b>	<b>Response</b>
CH-1	The commenter expresses support of the proposed 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, a response is not required and no changes to the EIR were determined to be necessary in response to this comment.

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## 2.4.7 David Seidel



COMMENT CARD

☐ YES, I would like to stay up to date on this project.

NAME DAVID SEIDEL

AFFILIATION (if applicable) LOCAL RESIDENT & <sup>MANAGER</sup> JPL EDUCATION OFFICE

COMMENTS: MY CONCERN INVOLVES LONG-TERM MAINTENANCE & VANDALISM. THE EIR (INCLUDING APPENDICES) MAKES NO MENTION OF "GRAFFITI" AND THE WORD "VANDALISM" APPEARS ONLY ONCE (IN RELATION TO CONSTRUCTION EQUIPMENT). EXPOSED FLAT SURFACES ARE VULNERABLE TO GRAFFITI & IF THEY ARE NOT SHIELDED BY PLANTS OR OTHER SEPARATIONS, ARE POTENTIALLY A MAJOR SOURCE OF DEGRADATION SHOULD MAINTENANCE BE DEFERRED.

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DS-1

### 2.4.7.1 Response to Letter from David Seidel

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Comment No.	Response
DS-1	<p>The commenter expresses a concern over the lack of analysis regarding the potential vandalism of the proposed project after completion. The commenter goes on to state that surfaces vulnerable to graffiti should be protected by landscaping or other barriers.</p> <p>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. The potential for vandalism will be addressed through material selection and the use of protective coatings such as anti-graffiti coatings or scratch-resistant films supported by the use of security cameras. The anticipated increase in park visitors will also help to further reduce the opportunities for vandalism.</p> <p>Currently, the park is lit for security and safety considerations and closes at 10 pm. The project does not propose to change these security protocols. Consistent with the California Supreme Court's decision in <i>California Building Industry Association v Bay Area Air Quality Management District</i> (S213478, December 17, 2015), CEQA generally does not require that public agencies analyze the impact existing conditions might have on a project. Further, vandalism is generally not considered an environmental consideration in a CEQA analysis. For these reasons, the EIR does not consider potential vandalism of future uses. No changes to the environmental evaluation contained EIR were determined to be necessary in response to this comment.</p>

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## 2.4.8 Alexander Wikstrom



### COMMENT CARD

☒ YES, I would like to stay up to date on this project.

NAME Alexander Wikstrom

AFFILIATION (if applicable) \_\_\_\_\_

COMMENTS: I think the larger entrance at Curson, the renewed pit viewing areas, and the Tar Bar are all welcome additions. I'm skeptical of having bridges over sulphur-odored tar or amphitheatre style seating by the lake. I think it's a mistake as a regular user of the park. My biggest concern is now the west hillside is getting eliminated. That's my picnic spot. I'm fine with an expansion, but I'd prefer it use the parking lot space instead. I'd also be sad to lose the native plant garden. I'd love to see my comments incorporated.

AW-1

AW-2

AW-3

AW-4

### 2.4.8.1 Response to Letter from Alexander Wikstrom

Comment No.	Response
AW-1	<p>The commenter lists features of the project that they approve of, including the Tar Bar and the redesigned pit viewing areas.</p> <p>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, a response is not required and no changes to the EIR were determined to be necessary in response to this comment.</p>
AW-2	<p>The commenter expresses their concern regarding the proposed seating next to the tar pits, as the odors from the pits may make the seating unenjoyable.</p> <p>The odors emitted from the tar pits are an existing condition of the project site. As described in EIR Section 5.2, Air Quality and Greenhouse Gas, implementation of the proposed project would not result in a significant impact related to the generation of adverse odors. Furthermore, the project would not exacerbate any issues associated with the existing odor generation of the site. While the odors emitted from the tar pits may be unpleasant to some, they are a fundamental aspect of the unique conditions of the project site. However, the County will take this comment under consideration as these points may be relevant for consideration in the project approval process. No changes to the EIR were determined to be necessary in response to this comment.</p>
AW-3	<p>The commenter expresses concern regarding accessibility of the hill to the west of the Page Museum. As discussed in EIR Section 5.12, Recreation implementation of the project would not impede public access to Hancock Park and impacts to recreation would be less than significant. While the project would not expand or increase the amount of area dedicated to existing passive recreational uses, it would include improvements to the existing recreational areas and outdoor open spaces through modification to the existing pedestrian pathways into a continuous paved pedestrian path linking the existing elements of the site, including the Central Green. The project would also add a children's play area, picnic areas, and other new passive recreational amenities, such as seating areas and viewing points.</p> <p>Further, it should be noted that the vast amount of parkland provided by the 13-acre Hancock Park would continue to serve as a park facility with implementation of the project. The proposed Master Plan seeks to retain and enhance most of the valuable open space and passive park orientation of the site. Additionally, the County will be recommending approval of Refined Alternative 3 of the Master Plan. This variation adjusts the footprint of the project to reduce the new museum building's contact with the Page Museum and expands the size of the Central Green.</p> <p>See <b>MR-1, Preferred Alternative</b>, for further information regarding the County's preferred alternative. No changes to the EIR were determined to be necessary in response to this comment.</p>
AW-4	<p>The commenter expresses concern over the loss of the garden within the Page Museum Atrium. The County will be recommending approval of Refined Alternative 3 of the Master Plan. 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. One of these refinements is to retain the atrium of the Page Museum as a garden. It would continue to have an open feel and include significant vegetation.</p> <p>See <b>MR-1, Preferred Alternative</b>, for further information regarding the County's preferred alternative. No changes to the EIR were determined to be necessary in response to this comment.</p>

## 2.4.9 Jodi Dybala

From: **Jodi Dybala**  
Date: Sun, Oct 1, 2023 at 9:38 PM  
Subject: Tar Pits  
To: Leslie Negritto

I am writing to contest the removal hundreds of mature trees in the park at the Tar Pits. We need all the trees we can grow. It would be a tragedy to remove them. Mature trees are extremely valuable by helping the city combat climate change, giving us oxygen, cleaning the air, sequestering carbon, giving us shade, providing home for the animals and providing beauty.

JD-1

Did you know when a trees dies, it releases carbon back into the atmosphere? Our summers are only getting hotter. Our springs, autumns, and winters are getting hotter as well. It would be wise to let the trees live where they are and do their job of cooling the city.

JD-2

Your website says "Part of our mission is to inspire responsibility for the natural world. Turning the dial down on the impacts of climate and habitat change means shifting our mindset to become aware of what we can do, as individuals and together, to build a more sustainable environment."

JD-3

A more sustainable environment is one where mature trees stay in the park.

All the best,  
Jodi Dybala

### 2.4.9.1 Response to Letter from Jodi Dybala

Comment No.	Response
JD-1	<p>The commenter expresses concern regarding the proposed removal of existing trees on the project site and emphasizes the benefits provided by mature trees such as shade and carbon sequestration.</p> <p>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.</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 exact trees to be removed through implementation of the project have not yet been determined. 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, the County is planning to remove diseased or unhealthy trees from the park with implementation of the project. Newly planted trees would be selected for resilience to disease and with consideration for their ability to create shaded areas at the park. In addition, retention of some trees may not be possible due to several issues related to feasibility of retention. These include the excavation requirements for construction of the building and the relative proximity of the trees to the new building location, planned park accessibility improvements, and fire access requirements. While there may be short term reductions to the amount of available shade at the project site, this loss will be recouped once the newly planted trees grow and mature.</p> <p>The proposed removal of trees at the La Brea Tar Pits site is not considered a significant impact on the environment. The environmental analysis contained in EIR Section 5.3, Biological Resources, is an accurate assessment of the potential for significant environmental impacts regarding tree and vegetation removal. Furthermore, any visual impacts related to tree removal is appropriately discussed within EIR Section 5.1, Aesthetics. 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. Refer to <b>MR-2, Impacts to Native and Mature Trees</b>, for further information. No changes to the EIR were determined to be necessary in response to this comment.</p>
JD-2	<p>The commenter states that the removal of trees on the La Brea Tar Pits site would result in the release of carbon into the atmosphere.</p> <p>Refer to response to comments JD-1 above. The comment is correct that mature trees are important for their carbon sequestering abilities. However, the project proposes to replace the removed trees with new trees which would eventually mature and sequester carbon as the removed trees did before. Therefore, potential release of carbon upon removal of existing trees would be compensated for by the planting of new trees. Furthermore, by relying on native and disease-resistant species, the new trees planted by the project may prove to be more resilient than some of the existing trees on the project site, thus resulting in longer term carbon sequestration. As discussed above, the proposed removal of trees at the La Brea Tar Pits site is not considered a significant impact on the environment. Further, 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. No changes to the EIR were determined to be necessary in response to this comment.</p>
JD-3	<p>The commenter provides a quote from the "About Us" section of the Natural History Museum website. This is not a comment on the analysis contained in the EIR; therefore, a response is not required and no changes to the EIR were determined to be necessary in response to this comment.</p>

## 2.4.10 Michelle Pesce

From: DJ Michelle Pesce  
Date: Mon, Oct 2, 2023 at 10:17 AM  
Subject: Removal of trees around the ear pit. Please reconsider !!!!  
To: Leslie Negritto

Save the trees. Thank you.

-midcity homeowner.

Michelle

IMP-1



### 2.4.10.1 Response to Letter from Michelle Pesce

Comment No.	Response
MP-1	<p>The commenter expresses concern regarding the proposed removal of existing trees on the project site. 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.</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 exact trees to be removed through implementation of the project have not yet been determined. 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, the County is planning to remove diseased or unhealthy trees from the park with implementation of the project. Newly planted trees would be selected for resilience to disease and with consideration for their ability to create shaded areas at the park. In addition, retention of some trees may not be possible due to several issues related to feasibility of retention. These include the excavation requirements for construction of the building and the relative proximity of the trees to the new building location, planned park accessibility improvements, and fire access requirements. While there may be short term reductions to the amount of available shade at the project site, this loss will be recouped once the newly planted trees grow and mature.</p> <p>The proposed removal of trees at the La Brea Tar Pits site is not considered a significant impact on the environment. The environmental analysis contained in EIR Section 5.3, Biological Resources, is an accurate assessment of the potential for significant environmental impacts regarding tree and vegetation removal. Furthermore, any visual impacts related to tree removal is appropriately discussed within EIR Section 5.1, Aesthetics. 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. Refer to <b>MR-2, Impacts to Native and Mature Trees</b>, for further information. No changes to the EIR were determined to be necessary in response to this comment.</p>

## 2.4.11 Will Tentindo

From: **Will Tentindo**  
Date: Mon, Oct 2, 2023 at 5:20 PM  
Subject: La Brea Tar Pits Master Plan  
To: Leslie Negritto

Hello,

I am writing to submit a comment on the Master Plan for the La Brea Tar Pits. I am a resident of the Miracle Mile neighborhood, I live down the street from the Tar Pits on Wilshire Blvd. I also visit the Tar Pits practically every day while on walks with my dog.

WT-1

I am completely supportive of the overall project to fix up the grounds and the Page museum. The museum needs updating desperately, and the city and county should invest urgently in fixing up this highlight in our community. Please also keep as much shade as possible. There are some really nice shady trees in the park right now, and those are going to be vital to our neighborhood as we experience global mass heating.

WT-2

I am extremely excited to see that all the statues around the Tar Pits area will be retained somewhere within the park. While the mammoths get the spotlight, the other statues are great and add visual interest (and kitsch) to the park. I hope the planners do not change that plan.

WT-3

I also write to encourage the planners to consider keeping the central atrium under alternative 2. The central atrium is a fantastic part of the museum, and truly surprises guests. It is also a really nice and unique feature to the museum, and I believe it is key to the museum's identity. Removing the garden inside would be a mistake.

WT-4

I understand Alternative 2 would have some negative impacts on park space, although from my impression the master plan slightly overstates that impact. I would encourage the planners to add the additional space of the museum to the parking lot and not the park. The museum could easily take away some parking spots rather than the parkland as the future metro stop will be open by the time this opens, the parking lot is never full, and there is ample additional parking in the LACMA and Petersen garages, the pyramid buildings across from SAG, and in the neighborhood below Wilshire. The Petersen garage in particular is huge and never full.

WT-5

I love the idea of using the top of the museum as a cafe and/or bar to activate the area more at night as well. If keeping the central atrium is not compatible with that plan, I would prefer the cafe/bar area.

WT-6

To the extent this next point might be outside the scope of the project, I understand. If the Tar Pits are able at all to add some additional grass to the area surrounding "Levitated Mass," that would be fantastic. The sand is a bit hostile (and frankly, ugly) to those of us who use the Tar Pits area for recreation.

WT-7

In general, I am excited to see this plan come to fruition and love that the planners have blended the old with the new! In implementing the plan, I hope the planners are able to keep the grounds walkable for as long as possible during construction and expedite the amount of time that the park is closed to visitors. The tar pits are a defining feature of LA and a great resource for the community!

WT-8

Thank you!  
Will Tentindo

### 2.4.11.1 Response to Letter from Will Tentindo

Comment No.	Response
WT-1	<p>The commenter states their personal stake in the project and their overall support of the proposed improvements to the Page Museum.</p> <p>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, a response is not required and no changes to the EIR were determined to be necessary in response to this comment.</p>
WT-2	<p>The commenter requests that shade producing trees should be retained as much as possible to provide relief for visitors during days with high temperatures.</p> <p>The County is prioritizing the protection of as many trees as possible, particularly important trees such as those which are shade-producing, and will avoid their removal if feasible while also meeting the budgetary and design needs for the project. However, retention of specific trees may not be possible due to several issues related to feasibility of retention. These include the excavation requirements for construction of the building and the relative proximity of the trees to the new building location, planned park accessibility improvements, and fire access requirements.</p> <p>The proposed removal of trees at the La Brea Tar Pits site is not considered a significant impact on the environment. The environmental analysis contained in EIR Section 5.3, Biological Resources, is an accurate assessment of the potential for significant environmental impacts regarding tree and vegetation removal. Visual impacts related to tree removal is also appropriately addressed within Section 5.1, Aesthetics. 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. Refer to <b>MR-2, Impacts to Native and Mature Trees</b>, for further information. No changes to the EIR were determined to be necessary in response to this comment.</p>
WT-3	<p>The commenter states that they are highly supportive of the retention of the Lake Pit Columbian mammoth statues.</p> <p>This is not a comment on the analysis contained in the EIR; therefore, a response is not required and no changes to the EIR were determined to be necessary in response to this comment. However, it should be noted that the Lake pit statues will be retained, although they may need to be removed and reinstalled in order to implement the improvements surrounding their location.</p>
WT-4	<p>The commenter shares the opinion that the central atrium is an integral facet of the Page Museum and requests that project Alternative 2 should be adopted.</p> <p>The County will be recommending approval of Refined Alternative 3 of the Master Plan. 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. One of these refinements is to retain the atrium of the Page Museum would remain as an atrium garden. It would continue to have an open feel and include significant vegetation.</p> <p>See <b>MR-1, Preferred Alternative</b>, for further information regarding the County's preferred alternative. No changes to the EIR were determined to be necessary in response to this comment.</p>
WT-5	<p>The commenter requests that the additional square footage being added to the Page Museum should be taken from the parking lot rather than from the open park space.</p> <p>As discussed in EIR Section 5.12, Recreation implementation of the project would not impede public access to Hancock Park and impacts to recreation would be less than significant. While the project would not expand or increase the amount of area dedicated to existing passive recreational uses, it would include improvements to the existing recreational areas and outdoor open spaces through modification to the existing pedestrian pathways into a continuous paved pedestrian path linking the existing elements of the site, including the Central Green. The project would also add a children's play area, picnic areas, and other new passive recreational amenities, such as seating areas and viewing points.</p> <p>Further, it should be noted that the vast amount of parkland provided by the 13-acre Hancock Park would continue to serve as a park facility with implementation of the project. The proposed Master Plan seeks to retain and enhance most of the valuable open space and passive park orientation of the site. Additionally, the County will be recommending approval of Refined Alternative 3 of the Master Plan. This variation adjusts the footprint of the project to reduce the new museum building's contact with the Page Museum and will expand the size of the Central Green. See <b>MR-1, Preferred Alternative</b>, for further information regarding the County's preferred alternative. No changes to the EIR were determined to be necessary in response to this comment.</p>
WT-6	<p>The commenter expressed their support of the "Tar Bar."</p> <p>This is not a comment on the analysis contained in the EIR; therefore, a response is not required and no changes to the EIR were determined to be necessary in response to this comment.</p>

<b>Comment No.</b>	<b>Response</b>
WT-7	<p>The commenter requests that the sand surrounding the “Levitated Mass” be replaced with grass to increase the recreational functionality of the park.</p> <p>The “Levitated Mass” is managed by the Los Angeles County Museum of Art and is not within the project boundaries of the proposed project. This is not a comment on the analysis contained in the EIR; therefore, a response is not required, and no changes to the EIR were determined to be necessary in response to this comment.</p>
WT-8	<p>The commenter again states their overall support of the project, and requests that the park remain accessible during construction.</p> <p>Refer to response to comments WT-5 above. While closure of portions of the park will be required in order to implement the park improvements while protecting the public, a construction sequencing plan will be developed for the purpose of maintaining public access to portions of the park throughout construction. No changes to the EIR were determined to be necessary in response to this comment.</p>

## 2.4.12 Miriyam Glazer

From: **Miriyam Glazer**  
Date: Thu, Oct 5, 2023 at 1:59 AM  
Subject: do not remove the trees!!!  
To: Leslie Negritto

As a resident of the area, I am appalled by the possibility of removing trees in order to expand the Tar Pits. NO NO NO NO NO NO NO! Given the reality of our area warming (like the rest of our planet), WE MUST PRESERVE EVERY PRECIOUS TREE WE HAVE!!!!

OR we ourselves will become the fossils subject to study by bewildered generations later.....

Prof. Dr. Miriyam Glazer

MG-1

### 2.4.12.1 Response to Letter from Miriyam Glazer

Comment No.	Response
MG-1	<p>The commenter expresses concern regarding the proposed removal of existing trees on the project site. 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.</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 exact trees to be removed through implementation of the project have not yet been determined. 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, the County is planning to remove diseased or unhealthy trees from the park with implementation of the project. Newly planted trees would be selected for resilience to disease and with consideration for their ability to create shaded areas at the park. In addition, retention of some trees may not be possible due to several issues related to feasibility of retention. These include the excavation requirements for construction of the building and the relative proximity of the trees to the new building location, planned park accessibility improvements, and fire access requirements. While there may be short term reductions to the amount of available shade at the project site, this loss will be recouped once the newly planted trees grow and mature.</p> <p>The proposed removal of trees at the La Brea Tar Pits site is not considered a significant impact on the environment. The environmental analysis contained in EIR Section 5.3, Biological Resources, is an accurate assessment of the potential for significant environmental impacts regarding tree and vegetation removal. Furthermore, any visual impacts related to tree removal is appropriately discussed within EIR Section 5.1, Aesthetics. 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. Refer to <b>MR-2, Impacts to Native and Mature Trees</b>, for further information. No changes to the EIR were determined to be necessary in response to this comment.</p>

## 2.4.13 Marcia Lansford

October 5, 2023

Natural History Museums of Los Angeles County  
Attn: Leslie Negritto, CEO  
900 Exposition Blvd  
Los Angeles CA 90007

Comment on the Draft EIR  
La Brea Tar Pits Master Plan Project

As I understand it your plan includes removal of some 180 trees to put up a parking lot.

ML-1

Are you mad?

You presented the need for additional lab space and it seems you have figured out a way to do that with the addition of more tiers within the existing museum. Good for you. Add a few tables and a bar to that marvelous space on top — seems like a nice touch. But why do we need covered pavilions? Why do we need another parking lot? The one we have is never full. This park is a rare and endangered ten thousand year old space. It doesn't need modernizing. It needs to be preserved. For god sake leave the park alone.

ML-2

ML-3

I am a neighbor and frequent visitor.  
Please keep me up to date on this project.  
Sincerely,

ML-4



Marcia Lansford

### 2.4.13.1 Response to Letter from Marcia Lansford

Comment No.	Response
ML-1	<p>The commenter expresses concern regarding the proposed removal of existing trees on the project site. 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.</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 exact trees to be removed through implementation of the project have not yet been determined. 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, the County is planning to remove diseased or unhealthy trees from the park with implementation of the project. Newly planted trees would be selected for resilience to disease and with consideration for their ability to create shaded areas at the park. In addition, retention of some trees may not be possible due to several issues related to feasibility of retention. These include the excavation requirements for construction of the building and the relative proximity of the trees to the new building location, planned park accessibility improvements, and fire access requirements. While there may be short term reductions to the amount of available shade at the project site, this loss will be recouped once the newly planted trees grow and mature.</p> <p>The proposed removal of trees at the La Brea Tar Pits site is not considered a significant impact on the environment. The environmental analysis contained in EIR Section 5.3, Biological Resources, is an accurate assessment of the potential for significant environmental impacts regarding tree and vegetation removal. Furthermore, any visual impacts related to tree removal is appropriately discussed within EIR Section 5.1, Aesthetics. 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. Refer to <b>MR-2, Impacts to Native and Mature Trees</b>, for further information. No changes to the EIR were determined to be necessary in response to this comment.</p>
ML-2	<p>The commenter expresses their support of the additional lab space and the Tar Bar.</p> <p>This is not a comment on the analysis contained in the EIR; therefore, a response is not necessary, and no changes to the EIR were determined to be necessary in response to this comment.</p>
ML-3	<p>The comment questions the need for covered pavilions and the addition of more parking, and generally disapproves of the park being upgraded.</p> <p>The County will be recommending approval of Refined Alternative 3 of the Master Plan. Refined Alternative 3 would reconfigure the on-site surface parking to complement the adjusted building footprint and would add a new entrance to the lot. However, 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. See <b>MR-1, Preferred Alternative</b>, for further information regarding the County's preferred alternative. No changes to the EIR were determined to be necessary in response to this comment.</p>
ML-4	<p>The commenter states their personal stake in the project.</p> <p>This is not a comment on the analysis contained in the EIR; therefore, a response is not necessary, and no changes to the EIR were determined to be necessary in response to this comment.</p>



## 2.4.14 Deatra Yatman

From: **DEATRA YATMAN**  
Date: Mon, Oct 9, 2023 at 9:35 PM  
Subject: Tree 🌳 removal for Museum  
To: Leslie Negritto

Hello

I am deeply concerned with the proposal to remove 180 trees for museum expansion. Given the rapid temperature rises everywhere, it is of extreme importance to preserve trees that provide a multitude of benefits for climate health and oxygen for people and much-needed habitat for wildlife.

I implore you NOT to do this. We must do all we can to protect and enhance the environment for all! Sincerely

Deatra Yatman

Sent from my iPhone

DY-1

### 2.4.14.1 Response to Letter from Deatra Yatman

Comment No.	Response
DY-1	<p>The commenter expresses concern regarding the proposed removal of existing trees on the project site. 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.</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 exact trees to be removed through implementation of the project have not yet been determined. 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, the County is planning to remove diseased or unhealthy trees from the park with implementation of the project. Newly planted trees would be selected for resilience to disease and with consideration for their ability to create shaded areas at the park. In addition, retention of some trees may not be possible due to several issues related to feasibility of retention. These include the excavation requirements for construction of the building and the relative proximity of the trees to the new building location, planned park accessibility improvements, and fire access requirements. While there may be short term reductions to the amount of available shade at the project site, this loss will be recouped once the newly planted trees grow and mature..</p> <p>The proposed removal of trees at the La Brea Tar Pits site is not considered a significant impact on the environment. The environmental analysis contained in EIR Section 5.3, Biological Resources, is an accurate assessment of the potential for significant environmental impacts regarding tree and vegetation removal. Furthermore, any visual impacts related to tree removal is appropriately discussed within EIR Section 5.1, Aesthetics. 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. Refer to <b>MR-2, Impacts to Native and Mature Trees</b>, for further information. No changes to the EIR were determined to be necessary in response to this comment.</p>

## 2.4.15 Lucy Bradley

From: **Lucy Bradley**  
Date: Tue, Oct 10, 2023 at 11:00 AM  
Subject: Do not remove mature trees at the Natural History Museum. Are you crazy!  
To: Leslie.Negritto@NHM.org

Do not remove mature trees at the Natural History Museum. Are you crazy!

**I LB-1**

Lucy Bradley  
LA 90048

### 2.4.15.1 Response to Letter from Lucy Bradley

Comment No.	Response
LB-1	<p>The commenter expresses concern regarding the proposed removal of existing trees on the project site. 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.</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 exact trees to be removed through implementation of the project have not yet been determined. 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, the County is planning to remove diseased or unhealthy trees from the park with implementation of the project. Newly planted trees would be selected for resilience to disease and with consideration for their ability to create shaded areas at the park. In addition, retention of some trees may not be possible due to several issues related to feasibility of retention. These include the excavation requirements for construction of the building and the relative proximity of the trees to the new building location, planned park accessibility improvements, and fire access requirements. While there may be short term reductions to the amount of available shade at the project site, this loss will be recouped once the newly planted trees grow and mature.</p> <p>The proposed removal of trees at the La Brea Tar Pits site is not considered a significant impact on the environment. The environmental analysis contained in EIR Section 5.3, Biological Resources, is an accurate assessment of the potential for significant environmental impacts regarding tree and vegetation removal. Furthermore, any visual impacts related to tree removal is appropriately discussed within EIR Section 5.1, Aesthetics. 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. Refer to <b>MR-2, Impacts to Native and Mature Trees</b>, for further information. No changes to the EIR were determined to be necessary in response to this comment.</p>

## 2.4.16 Celine Burk

From: Celine Burk  
Date: Tue, Oct 10, 2023 at 5:11 PM  
Subject: Mature Tree Removal should be stopped  
To: Leslie Negritto

Dear Leslie--As a community member and avid supporter of the Museum I would urge you to revisit the decision to remove 50 mature trees to make way for an expansion. Perhaps they could be incorporated in the design or the design modified so as not to remove them. With global warming and our worsening air quality, the removal of these trees is ill advised and a disservice to the community at large.

Please reconsider,

Celine Burk

CB-1

### 2.4.16.1 Response to Letter from Celine Burk

Comment No.	Response
CB-1	<p>The commenter expresses concern regarding the proposed removal of existing trees on the project site. 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.</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 exact trees to be removed through implementation of the project have not yet been determined. 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, the County is planning to remove diseased or unhealthy trees from the park with implementation of the project. Newly planted trees would be selected for resilience to disease and with consideration for their ability to create shaded areas at the park. In addition, retention of some trees may not be possible due to several issues related to feasibility of retention. These include the excavation requirements for construction of the building and the relative proximity of the trees to the new building location, planned park accessibility improvements, and fire access requirements. While there may be short term reductions to the amount of available shade at the project site, this loss will be recouped once the newly planted trees grow and mature.</p> <p>proposed removal of trees at the La Brea Tar Pits site is not considered a significant impact on the environment. The environmental analysis contained in EIR Section 5.3, Biological Resources, is an accurate assessment of the potential for significant environmental impacts regarding tree and vegetation removal. Furthermore, any visual impacts related to tree removal is appropriately discussed within EIR Section 5.1, Aesthetics. 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. Refer to <b>MR-2, Impacts to Native and Mature Trees</b>, for further information. No changes to the EIR were determined to be necessary in response to this comment.</p>

## 2.4.17 McCall Jones

From: **R. McCall Jones III**  
Date: Tue, Oct 10, 2023 at 3:56 PM  
Subject: Tar Pits Construction and tree removal  
To: Leslie Negritto

To Whom It May Concern:

I am writing to contest the removal hundreds of mature trees in the park at the Tar Pits. We need all the trees we can grow. It would be a tragedy to remove them. Mature trees are extremely valuable by helping the city combat climate change, giving us oxygen, cleaning the air, sequestering carbon, giving us shade, providing home for the animals and providing beauty.

Did you know when a trees dies, it releases carbon back into the atmosphere? Our summers are only getting hotter. Our springs, autumns, and winters are getting hotter as well. It would be wise to let the trees live where they are and do their job of cooling the city.

Your website says "Part of our mission is to inspire responsibility for the natural world. Turning the dial down on the impacts of climate and habitat change means shifting our mindset to become aware of what we can do, as individuals and together, to build a more sustainable environment."

**A more sustainable environment is one where mature and still growing trees stay in the park.**

All the best,  
McCall Jones

MCJ-1

### 2.4.17.1 Response to Letter from McCall Jones

Comment No.	Response
MCJ-1	<p>The commenter expresses concern regarding the proposed removal of existing trees on the project site. 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.</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 exact trees to be removed through implementation of the project have not yet been determined. 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, the County is planning to remove diseased or unhealthy trees from the park with implementation of the project. Newly planted trees would be selected for resilience to disease and with consideration for their ability to create shaded areas at the park. In addition, retention of some trees may not be possible due to several issues related to feasibility of retention. These include the excavation requirements for construction of the building and the relative proximity of the trees to the new building location, planned park accessibility improvements, and fire access requirements. While there may be short term reductions to the amount of available shade at the project site, this loss will be recouped once the newly planted trees grow and mature.</p> <p>The proposed removal of trees at the La Brea Tar Pits site is not considered a significant impact on the environment. The environmental analysis contained in EIR Section 5.3, Biological Resources, is an accurate assessment of the potential for significant environmental impacts regarding tree and vegetation removal. Furthermore, any visual impacts related to tree removal is appropriately discussed within EIR Section 5.1, Aesthetics. 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. Refer to <b>MR-2, Impacts to Native and Mature Trees</b>, for further information. No changes to the EIR were determined to be necessary in response to this comment.</p>



## 2.4.18 Hadas Laureano

From: **hadas Laureano**  
Date: Tue, Oct 10, 2023 at 9:51 PM  
Subject: Do Not remove the trees of the natural history museum  
To: Leslie Negritto

We Love tjose trees. Please do not hurt or remove them. Plant more if you can. Respect what we want and what Gd wants. Hadas Laureano  
Sent from my iPhone

I HL-1

### 2.4.18.1 Response to Letter from Hadas Laureano

Comment No.	Response
HL-1	<p>The commenter expresses concern regarding the proposed removal of existing trees on the project site. 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.</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 exact trees to be removed through implementation of the project have not yet been determined. 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, the County is planning to remove diseased or unhealthy trees from the park with implementation of the project. Newly planted trees would be selected for resilience to disease and with consideration for their ability to create shaded areas at the park. In addition, retention of some trees may not be possible due to several issues related to feasibility of retention. These include the excavation requirements for construction of the building and the relative proximity of the trees to the new building location, planned park accessibility improvements, and fire access requirements. While there may be short term reductions to the amount of available shade at the project site, this loss will be recouped once the newly planted trees grow and mature.</p> <p>While tree removal can be significant, depending on the context, the proposed removal of trees at the La Brea Tar Pits site is not considered a significant impact on the environment. The environmental analysis contained in EIR Section 5.3, Biological Resources, is an accurate assessment of the potential for significant environmental impacts regarding tree and vegetation removal. Furthermore, any visual impacts related to tree removal is appropriately discussed within EIR Section 5.1, Aesthetics. 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. Refer to <b>MR-2, Impacts to Native and Mature Trees</b>, for further information. No changes to the EIR were determined to be necessary in response to this comment.</p>

## 2.4.19 Elwarder Silas

From: El Warder Silas  
Date: Tue, Oct 10, 2023 at 11:32 PM  
Subject: LaBrea Tarpit Trees  
To: Leslie Negritto

Hey There 🐼 Please do it remove the 180 trees!  
Elwarder Silas  
Sent from my iPhone

IES-1

### 2.4.19.1 Response to Letter from Elwarder Silas

Comment No.	Response
ES-1	<p>The commenter expresses concern regarding the proposed removal of existing trees on the project site. 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.</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 exact trees to be removed through implementation of the project have not yet been determined. 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, the County is planning to remove diseased or unhealthy trees from the park with implementation of the project. Newly planted trees would be selected for resilience to disease and with consideration for their ability to create shaded areas at the park. In addition, retention of some trees may not be possible due to several issues related to feasibility of retention. These include the excavation requirements for construction of the building and the relative proximity of the trees to the new building location, planned park accessibility improvements, and fire access requirements. While there may be short term reductions to the amount of available shade at the project site, this loss will be recouped once the newly planted trees grow and mature.</p> <p>While tree removal can be significant, depending on the context, the proposed removal of trees at the La Brea Tar Pits site is not considered a significant impact on the environment. The environmental analysis contained in EIR Section 5.3, Biological Resources, is an accurate assessment of the potential for significant environmental impacts regarding tree and vegetation removal. Furthermore, any visual impacts related to tree removal is appropriately discussed within EIR Section 5.1, Aesthetics. 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. Refer to <b>MR-2, Impacts to Native and Mature Trees</b>, for further information. No changes to the EIR were determined to be necessary in response to this comment.</p>

## 2.4.20 Angela Bradshaw

From: **Angela Bradshaw**  
Date: Wed, Oct 11, 2023 at 12:11 PM  
Subject: Museum expansion and destruction of trees  
To: Leslie Negritto

I am writing to protest the proposed destruction of trees for your museum expansion. In light of global warming and all of the research showing the benefits of trees to our health and wellbeing, and the many years it takes for trees to become mature, whose idea was this?

While cities, towns and countries around the world plant as many trees as possible, the museum has decided that trees are disposable.

Please reconsider the destruction of our urban forest.

--  
Enjoy your day.

Angela Bradshaw  
323-919-9326

AB-1

### 2.4.20.1 Response to Letter from Angela Bradshaw

Comment No.	Response
AB-1	<p>The commenter expresses concern regarding the proposed removal of existing trees on the project site. 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.</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 exact trees to be removed through implementation of the project have not yet been determined. 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, the County is planning to remove diseased or unhealthy trees from the park with implementation of the project. Newly planted trees would be selected for resilience to disease and with consideration for their ability to create shaded areas at the park. In addition, retention of some trees may not be possible due to several issues related to feasibility of retention. These include the excavation requirements for construction of the building and the relative proximity of the trees to the new building location, planned park accessibility improvements, and fire access requirements. While there may be short term reductions to the amount of available shade at the project site, this loss will be recouped once the newly planted trees grow and mature.</p> <p>While tree removal can be significant, depending on the context, the proposed removal of trees at the La Brea Tar Pits site is not considered a significant impact on the environment. The environmental analysis contained in EIR Section 5.3, Biological Resources, is an accurate assessment of the potential for significant environmental impacts regarding tree and vegetation removal. Furthermore, any visual impacts related to tree removal is appropriately discussed within EIR Section 5.1, Aesthetics. 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. Refer to <b>MR-2, Impacts to Native and Mature Trees</b>, for further information. No changes to the EIR were determined to be necessary in response to this comment.</p>

## 2.4.21 Nancy Schwartz

From: maria schwartz  
Date: Wed, Oct 11, 2023 at 11:49 AM  
Subject: Tree removal  
To: Leslie Negritto

Dear Miss Negritto; I was made aware of the plan by the NHM to remove a large number of trees to expand an exhibit; I hope it is misinformation; given the state of the environment and the urgent need to conserve natural resources it will be unconscionable to remove trees, source of air and shade.

If the removal of trees is indeed planned; please kindly let me know whom should be contacted about it.

Nancy Schwartz  
Concern L.A. Resident

Sent from my iPhone

NS-1

### 2.4.21.1 Response to Letter from Nancy Schwartz

Comment No.	Response
NS-1	<p>The commenter expresses concern regarding the proposed removal of existing trees on the project site. 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.</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 exact trees to be removed through implementation of the project have not yet been determined. 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, the County is planning to remove diseased or unhealthy trees from the park with implementation of the project. Newly planted trees would be selected for resilience to disease and with consideration for their ability to create shaded areas at the park. In addition, retention of some trees may not be possible due to several issues related to feasibility of retention. These include the excavation requirements for construction of the building and the relative proximity of the trees to the new building location, planned park accessibility improvements, and fire access requirements. While there may be short term reductions to the amount of available shade at the project site, this loss will be recouped once the newly planted trees grow and mature.</p> <p>While tree removal can be significant, depending on the context, the proposed removal of trees at the La Brea Tar Pits site is not considered a significant impact on the environment. The environmental analysis contained in EIR Section 5.3, Biological Resources, is an accurate assessment of the potential for significant environmental impacts regarding tree and vegetation removal. Furthermore, any visual impacts related to tree removal is appropriately discussed within EIR Section 5.1, Aesthetics. 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. Refer to <b>MR-2, Impacts to Native and Mature Trees</b>, for further information. No changes to the EIR were determined to be necessary in response to this comment.</p>



## 2.4.22 Paula Waxman

From: **Paula Waxman**  
Date: Wed, Oct 11, 2023 at 5:30 PM  
Subject: Removing trees at Tar Pit Expansion  
To: Leslie Negritto

Dear M. Gritto,

It has come to my attention that the Natural History Museum plans to remove 180 mature trees. If this be correct, I would like to express my chagrin at this idea. We need MORE trees not less and we've lived with our current Natural History Museum for generations.

If you have to expand, please go up.

PW-1

### 2.4.22.1 Response to Letter from Paula Waxman

Comment No.	Response
PW-1	<p>The commenter expresses concern regarding the proposed removal of existing trees on the project site. 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.</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 exact trees to be removed through implementation of the project have not yet been determined. 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, the County is planning to remove diseased or unhealthy trees from the park with implementation of the project. Newly planted trees would be selected for resilience to disease and with consideration for their ability to create shaded areas at the park. In addition, retention of some trees may not be possible due to several issues related to feasibility of retention. These include the excavation requirements for construction of the building and the relative proximity of the trees to the new building location, planned park accessibility improvements, and fire access requirements. While there may be short term reductions to the amount of available shade at the project site, this loss will be recouped once the newly planted trees grow and mature.</p> <p>While tree removal can be significant, depending on the context, the proposed removal of trees at the La Brea Tar Pits site is not considered a significant impact on the environment. The environmental analysis contained in EIR Section 5.3, Biological Resources, is an accurate assessment of the potential for significant environmental impacts regarding tree and vegetation removal. Furthermore, any visual impacts related to tree removal is appropriately discussed within EIR Section 5.1, Aesthetics. 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. Refer to <b>MR-2, Impacts to Native and Mature Trees</b>, for further information. No changes to the EIR were determined to be necessary in response to this comment.</p>

## 2.4.23 Sandra Dashiel

From: **Sandra Dashiel**  
Date: Wed, Oct 25, 2023 at 11:21 PM  
Subject: La Brea Tar Pits Project DEIR - Public Comments  
To: Leslie Negritto

Dear Ms. Negritto,

I live adjacent to the Tar pits Reimagining project, in Park La Brea.

My comments are as follows:

The DEIR contains no mention of the serious pedestrian hazard that exists on Curson. A crosswalk that gives safe passage to those who cross in the middle of the block is needed to make it safe for the public to visit your facility.

There are two pedestrian entrances on Curson— one is opposite One Museum Square, and the other is opposite Museum Terrace and the SAG parking lot entrance.

In all there are four major properties across from the Curson pedestrian entrances to the Tar pits:

- 1) Museum Terrace Apartment Complex;
- 2) the SAG parking lot where MANY visitors park because it's much cheaper than the museum parking lot;
- 3) One Museum Square apartment highrise; and
- 4) the SAG building with many restaurants whose entrances are across from the museum entrance on Curson, with no need to walk up to Wilshire

The amount of people who cross Curson between these four properties and the Tar pits is a cause for concern. The Environmental Impact Report did not study this. The danger will be made more severe by the opening of the "reimagined" La Brea Tar pits which will bring more people. More visitors = more chance of someone being hit by a car.

The tenants in the apartment complexes can walk out their doors and be directly opposite the entrance to walk their dogs, go for a walk, visit museums, etc.

Recently I saw a school bus parked in front of One Museum Square opposite the Curson entrance gate. The people were out of the bus and crossing the street to go in the Curson entrance gate.

The attached photo shows a family crossing to enter at the Curson entrance gate. This happens all day every day.

Please study this problem and address it. Except for that, I am excited about the plans to update and enhance the Tar Pits experience.

Sincerely,

Sandra Dashiel

SD-1

SD-2

SD-3



SD-3  
(cont'd)



SD-3  
(cont'd)



### 2.4.23.1 Response to Letter from Sandra Dashiel

Comment No.	Response
SD-1	<p>The commenter suggests the addition of a crosswalk in the middle Curson Ave to provide safe access to the park.</p> <p>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.</p> <p>The suggestion for a midblock pedestrian crossing at the pedestrian entrance along Curson Avenue was considered by the County. This type of crossing could conflict with bus loading curb space on the west side of Curson Avenue. As well, the curvature of the road along Curson Avenue north of Wilshire Boulevard and south of the pedestrian entrance may pose a potential northbound vehicle sight-distance issue as this location is very close to the merging area north of Wilshire Boulevard, where two streams of northbound vehicles merge. Driveways and utilities also act as a barrier to the placement of a safe crossing facility in this location. Further, the location in question does not exhibit a history of pedestrian crashes. According to the Transportation Injury Mapping System (TIMS), which is a database of California crash data, there was one midblock pedestrian crash for the 10-year period between 2013 and 2022. The crash occurred 110 feet south of the intersection with 6th Street, north of the location being referenced in this comment letter. In addition, this segment is not included as part of the City's high injury network, which is the focus of LADOT's comprehensive safety improvements where the highest concentration of traffic deaths and severe injury crashes occur.</p> <p>While the proposed project would likely increase the number of people who visit the site each day, there is no evidence that this would lead to an increase of pedestrians choosing to cross Curson Avenue at the midblock section rather than at an existing crosswalk facility. Overall, the improved circulation system proposed by the project would encourage visitors to enter and exit the site in proper locations located immediately near existing crosswalk facilities. The renovated Wilshire Avenue and 6th Street gateway entrances would encourage visitors to use the existing crosswalk facilities at the southeast and northwest corners of the site. Specifically, the improved visibility of the renovated Wilshire gateway entrance is anticipated to result in a decrease in the number of visitors accessing the site from Curson Avenue. The project also proposes a new school drop-off area immediately in front of the Curson Avenue entrance. This drop-off area would further discourage pedestrians from attempting to access the site through the Curson Avenue entrance and would potentially disrupt illegal pedestrian crossings. Additionally, the existing Page Museum entrance would be primarily used as an educational group and tour entrance, which would be connected to the new school drop-off area on South Curson Avenue. This is expected to discourage visitors from exiting the site using the Curson Avenue entrance, and therefore would further reduce the potential for illegal pedestrian crossings on Curson Avenue. As such, the combination of the renovated gateway entrances and the proposed school drop-off zone would discourage any new visitors generated by the project from attempting to enter the project site by illegally crossing Curson Avenue.</p> <p>Similar comments have been made by the Park La Brea Impacted Residents Group. Please refer to response to comments PLBIRG-3, PLBIRG-4, and PLBIRG-5 for similar information. The environmental analysis contained in EIR Section 5.13, Transportation, is an accurate assessment of the potential for significant environmental impacts regarding transportation and hazardous intersections. Implementation of the project would not change the existing conditions of the Curson Avenue midblock crossing; therefore, the project would not cause a transportation impact related to hazardous conditions for pedestrians. No changes to the EIR were determined to be necessary in response to this comment.</p>
SD-2	<p>The commenter explains their specific concerns regarding pedestrian access to the park via Curson Avenue. Refer to response to comments SD-1, as well as PLBIRG-3, PLBIRG-4, and PLBIRG-5. Implementation of the project would not change the existing conditions of the pedestrian usage at the Curson Avenue midblock crossing; therefore, the project would not cause a transportation impact related to hazardous conditions for pedestrians. Further, a midblock pedestrian crossing at the location proposed by the commenter is likely not feasible. Additionally, the location in question does not exhibit a history of documented pedestrian-related accidents. No changes to the EIR were determined to be necessary in response to this comment.</p>
SD-3	<p>The commenter provides information, including photos, of pedestrians jaywalking across Curson Avenue to access Hancock Park.</p> <p>Refer to response to comments SD-1, as well as PLBIRG-3, PLBIRG-4, and PLBIRG-5. Implementation of the project would not change the existing conditions of the Curson Avenue midblock crossing; therefore, the project would not cause a transportation impact related to hazardous conditions for pedestrians. Further, a midblock pedestrian crossing at the location proposed by the commenter is likely not feasible. As well, the location in question does not exhibit a history of documented pedestrian-related accidents. No changes to the EIR were determined to be necessary in response to this comment.</p>

## 2.4.24 Joanne D'Antonio

Joanne D'Antonio

October 26, 2023

Leslie Negritto, Chief Operating Officer  
Natural History Museums of Los Angeles County  
900 Exposition Boulevard  
Los Angeles, California 90007  
Via e-mail: Leslie.Negritto@tarpits.org

RE: Public Comment on Proposed La Brea Tar Pits Master Plan Project

Dear Chief Operating Officer Negritto:

I am the founder and chair of the Neighborhood Council Sustainability Alliance (NCSA) Trees Committee, and I wrote the first half of the NCSA comment letter that was voted on by the NCSA Board and voting Neighborhood Council Reps, which is being submitted today. Many in our Alliance, who are versed in the important assets of trees and native plants voiced concerns about tree removals to me and to representatives of the proposed La Brea Tar Pits Master Plan Project (the Project) over the past two+ years, and they were told by the spokesman for the project to wait for the EIR. And now the EIR has come out, and there are serious environmental issues with the Project as presented. Most strikingly, there is no tree inventory, and it appears the site will be losing between 140-180 trees.

JDA-1

Every time I go to the Motion Picture Academy Museum Dolby Family Terrace and look at the view toward the La Brea Tar Pits, I see a beautiful park with a death sentence and wonder how long it has to live. Valuable mature trees will be chopped down to join the hardscape that is taking over our City and adding to our heat island problem – Los Angeles County will experience triple the number of hot days per year by 2053 according to this study cited in the LA Times in 2022 <https://firststreet.org/press/press-release-2022-heat-model-launch/>

The New York Times reported in September 2023 reported what Singapore is doing for its heat problem, came to a natural simple solution -- trees:

"If you wanted to invent the most effective kind of climate management technology from the ground up, you could spend a lot of time trying to do that. You would just engineer a tree," said Brian Stone Jr., director of the Urban Climate Lab at the Georgia Institute of Technology.  
<https://www.nytimes.com/interactive/2023/09/18/world/asia/singapore-heat.html>

JDA-2

Trees are more than an aesthetic element, and the science is telling us for the benefit of humans we need to put the ecosystem services of trees as our priority.

I provided this analysis of the DEIR in the NCSA comment letter and stand by these points:

From the DEIR Appendix B p. 29:

*Existing trees and plantings throughout the park are scattered and achieve little sense of character or unity. The enhanced character of the park will require new plantings as well as existing trees and plantings that complement the concept design. Species such as the Western Sycamore, California Buckeye, and Redwood should be preserved.*

JDA-3

With the current heat crisis in Los Angeles, we need to retain every shade-producing tree. Replacement planting deprives the City of ecosystem services for 20 years while trees attain maturity. Dr. Beverly Law, Emeritus Professor of Global Change Biology, explains how new trees initially add carbon to the atmosphere and only mature trees sequester carbon, one of the chief environmental benefits from trees. <https://www.youtube.com/watch?v=LDdK0mVkyg&feature=youtu.be>

JDA-3  
(cont'd)

Given the benefits of mature trees, the "character and unity", stated in the above quote from the DEIR, should not be the deciding factor for tree elimination. While the palms and agaves at the project site may be expendable, there are numerous shade trees that should be preserved but will not in this Master Plan. Even more disturbing, the DEIR says, "Western Sycamore, California Buckeye, and Redwood should be preserved" BUT ACCORDING TO THE PRESENTATION ON SEPTEMBER 30, THESE VALUABLE NATIVE TREES ARE NOT BEING PRESERVED AND THIS IS NOT REVEALED IN THE DEIR. If the DEIR says the native trees "should be preserved", then it should have begun with an inventory of all these native trees / shrubs and designed around them. Native redwoods are on the grounds and are not preserved in this plan. A very large Western sycamore is in the footprint of the building. It is ironic that a project that is dedicated to educating the public about extinction does not begin with a mandate to preserve valuable specimens of extant but rare native trees and other native plants. Select highly precious native tree specimens on the Tar Pits site are cited in section 2) of this comment letter below.

JDA-4

JDA-5

JDA-6

From the DEIR Appendix B p.19:

*A picnic area under the canopy and shade trees provides new programming opportunities, from outdoor education and school lunches to orientation and gathering.*

JDA-7

Again, new trees provide no appreciable shade for 20 years. At the picnic area there is an opportunity for tree preservation if the construction company is mandated to protect existing valuable trees. These trees border construction, and the builders must be sensitive to protecting existing trees instead of relying on a "planting plan." Tree preservation requires expert supervision to avoid harm to the trees.

From the DEIR Appendix B p.28:

*A woodland zone along the park's peripheral edges (northern, southern, eastern, and western) provides shade to the picnic areas and the parking lot to the north. These landscape zones are designed to maximize space for community, creating opportunities for the public to engage with the site's natural history and create a distinctive identity for the park to help tell La Brea's story. The planting scheme addresses the realities of Los Angeles's current and projected climate and aims to ease water consumption, ensure appropriate maintenance, promote sustainable growth, and provide a model for resilient site planning in the area.*

JDA-8

A museum dedicated to studying past extinctions should mitigate future extinctions by committing that **EVERY new plant and tree will be native**. Experts like Doug Tallamy, PhD professor in the Department of Entomology and Ecology at the University of Delaware, who has authored 80 research articles and 4 bestselling books who spoke at the City of Los Angeles Community Forest Advisory Committee at the October 2023 meeting, told us **we must do this in cities in all planting spaces**. (I serve as an official Representative – we are part of the City of Los Angeles Board of Public Works)



Other ecologists concur:

*Native plants play a very important role in our ecosystems. As ecologists, wildlife biologists and entomologist have shown, native plant species are more favorable for supporting local wildlife, including insects such as bees and butterflies, amphibians, reptiles, and mammals. Native plants feed the creatures at the bottom of the food web that then provide meals for creatures on the next ring of the web, such as the birds.* <https://www.ecolandscaping.org/native-plants/>

Is this Project creating its contribution to wildlife extinction that will be featured in future natural history exhibits? I can't imagine that was the intent, but that could become the result. There is wildlife on the grounds, and birds rely on our ever-diminishing trees, especially the native trees. When we analyze the renderings, some of the oldest specimens extant of native trees are slated to be removed. Perils are being created for birds – I endorse the LA Audubon DEIR comment letter on the Project with its supporting scientific citations.

The Los Angeles Sidewalk Repair Program EIR was successfully challenged, and the CEQA judge used as grounds the LA Audubon comment letter as well as the letter from the City of Los Angeles Community Forest Advisory Committee describing ill effects on bird population and migration. "The judge ruled that the impact report failed to thoroughly examine the effects on wildlife and the environmental consequences of trading mature trees for young replacement trees." <https://spectrumnews1.com/ca/la-west/environment/2023/02/12/judge-halts-la-plan-to-destroy-trees-for-sidewalk-repairs>

The Project structure itself will have negative impacts on birds according to the LA Audubon letter. "More than 1000 birds were killed in one night after hitting the same Chicago building." <https://www.cnn.com/2023/10/10/us/dead-birds-chicago-building-scn-trnd/index.html#:~:text=Follow%20CNN-.More%20than%201%2C000%20birds%20killed%20in%20one.hitting%20the%20same%20Chicago%20building&text=Workers%20at%20the%20Chicago%20Field.the%20McCormick%20Place%20Lakeside%20Center.>

That is a headline you would not want for your new museum, but a glass building lit from within will cause this. Our bird population is rapidly diminishing, and The Museum of Natural History has apparently not learned from its past mistakes after constructing a bird-killing structure previously (the Otis Booth Pavilion). <https://www.archpaper.com/2013/09/las-natural-history-museum-addition-not-for-the-birds/>.

This DEIR was due in the fall of 2022, so it is a year late, and in that year the project has gone too far. The excuse will be that the design has reached a point of no return. But the public was not heeded during scoping and afterward they were told to hold off objections until the EIR. There will be an outcry when this important beautiful park is destroyed, just from a public amenities point of view – let alone the irreparable environmental damage. You will need ecological landscapers, not regular landscapers, to even begin to do long term mitigation of the damage of this project. And I question if it is even possible.

A more modest approach would have been sounder for the environment, but that does not appear the path that was taken. If you have alternatives, please consider them as the responsible choice. This unusual design may be showy, but in the end, it does not serve the health of the community which depends on proper environmental choices.

Sincerely,

**Joanne D'Antonio (submitted as an individual)**

Neighborhood Council Sustainability Alliance (NCSA), Trees Committee Chair  
Community Forest Advisory Committee (CFAC) Representative

JDA-8  
(cont'd)

JDA-9

JDA-10

JDA-11

JDA-12

JDA-13

JDA-14

### 2.4.24.1 Response to Letter from Joanne D'Antonio

Comment No.	Response
JDA-1	<p>The commenter states their stake in the project and raises concerns regarding the lack of a tree inventory in the EIR, and the number of trees to be removed by the project.</p> <p>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.</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 commenter is correct that the EIR does not provide identification of the exact trees to be removed through implementation of the project. However, the implication that this is required for a CEQA document is not correct. The project description for the EIR only needs to include the information necessary to conclude a project's potential for significant environmental impacts. The full range of potentially significant biological resource impacts, including those to trees, is provided in the EIR in Section 5.3, Biological Resources. The thresholds of significance address the full range of impacts that could occur with the project, including impacting tree specimens protected by local ordinances. In this case, the property is on County of Los Angeles land.</p> <p>The exact trees to be removed through implementation of the project have not yet been determined. 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, the County is planning to remove diseased or unhealthy trees from the park with implementation of the project. Newly planted trees would be selected for resilience to disease and with consideration for their ability to create shaded areas at the park. In addition, retention of some trees may not be possible due to several issues related to feasibility of retention. These include the excavation requirements for construction of the building and the relative proximity of the trees to the new building location, planned park accessibility improvements, and fire access requirements. While there may be short term reductions to the amount of available shade at the project site, this loss will be recouped once the newly planted trees grow and mature.</p> <p>The proposed removal of trees at the La Brea Tar Pits site is not considered a significant impact on the environment. The environmental analysis contained in EIR Section 5.3, Biological Resources, is an accurate assessment of the potential for significant environmental impacts regarding tree and vegetation removal. Furthermore, any visual impacts related to tree removal is appropriately discussed within EIR Section 5.1, Aesthetics. 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. Refer to <b>MR-2, Impacts to Native and Mature Trees</b>, for further information. No changes to the EIR were determined to be necessary in response to this comment.</p>
JDA-2	<p>The commenter raises their personal observations and experiences of viewing the trees at La Brea Tar Pits and an article the commenter presents about Singapore's use of trees to address their heat problem.</p> <p>Any visual impacts related to tree removal is appropriately discussed within EIR Section 5.1, Aesthetics, which concluded a less than significant impact.</p> <p>The comment is correct that mature trees are important for their shade-producing abilities. As discussed in MR-2, 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, retention of trees may not be possible due to several issues related to feasibility of retention. These include the excavation requirements for construction of the building and the relative proximity of the trees to the new building location, planned park accessibility improvements, and fire access requirements. In addition, the County is planning to remove diseased or unhealthy trees from the park with implementation of the project. Newly planted trees would be selected for resilience to disease and with consideration for their ability to create shaded areas at the park. While there may be short term reductions to the amount of available shade at the project site, this loss will be recouped once the newly planted trees grow and mature.</p> <p>Refer to JDA-1 and <b>MR-2, Impacts to Native and Mature Trees</b>. No changes to the EIR were determined to be necessary in response to this comment.</p>

Comment No.	Response
JDA-3	<p>This comment quotes language from Appendix B of the EIR and indicates that all the shade-producing tress should be retained. Specifically, the commenter claims that according to Dr. Beverly Law, there is evidence that newly planted trees initially emit carbon, and only mature trees sequester carbon.</p> <p>Refer to <b>MR-2, Impacts to Native and Mature Trees</b>, and response to comment NCSA-6. This comment does not critique the analysis contained in the EIR; rather, the commenter is noting that they disagree with the County's approach to the project.</p> <p>The comment is correct that mature trees are important for their carbon sequestering abilities. As discussed in MR-2, 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, retention of trees may not be possible due to several issues related to feasibility of retention. These include the excavation requirements for construction of the building and the relative proximity of the trees to the new building location, planned park accessibility improvements, and fire access requirements. In addition, the County is planning to remove diseased or unhealthy trees from the park with implementation of the project. Newly planted trees would be selected for resilience to disease and with consideration for their ability to create shaded areas at the park. While there may be short term reductions to the amount of available shade at the project site, this loss will be recouped once the newly planted trees grow and mature.</p> <p>However, the comment's claim that new trees should be viewed as sources of carbon is not entirely accurate. According to the PBS video referenced by the comment, Dr. Beverly Law provides evidence that new <i>forests</i> may be net sources of carbon, and that mature <i>forests</i> sequester greater quantities of carbon. The study in questions takes the entire carbon cycle of forests into account, including decomposition on the forest floor, and assumes that every tree in the forest is newly planted. The purpose of the study was to provide evidence that retaining old growth forests is a more effective means of carbon sequestration than planting new forests. As the trees within the project site exist in a built-up urban environment, comparing the impacts of tree replacement by the project to the replacement of an entire old growth forest is erroneous. There is no reliable evidence that suggests that planting new trees would increase carbon emissions. It is true that the carbon sequestration abilities of the site would be reduced by removing mature trees, however, these losses would be recouped as the new trees mature. Furthermore, by relying on native and disease-resistant species, the new trees planted by the project may prove to be more resilient than some of the existing trees on the project site, thus resulting in longer term carbon sequestration. The EIR found that the project's greenhouse gas impacts would be less than significant after implementation of Mitigation Measures GHG/mm-1.1 and TRA/mm-1.1. As the EIR does not rely on the project's carbon sequestration potential to make an impact conclusion, the potential short-term reductions in carbon sequestration are not relevant to the analysis included in the EIR. Therefore, no changes to the EIR were determined to be necessary in response to this comment.</p>
JDA-4	<p>The commenter provides additional information supporting their opinion that the existing trees at the project site should not be removed. Specifically, the commenter references a quote from Appendix B of the DEIR and argues that the "character and unity" of the site should not be the deciding factor for tree removal.</p> <p>Refer to <b>MR-2, Impacts to Native and Mature Trees</b>, and JDA-1 and JDA-3. The quote referenced by the comment has been taken out of context. No trees are proposed to be removed solely because they do not add to the character and unity of the site. Instead, the quote is meant to demonstrate that there will be an emphasis on improving the character and unity of the site with the proposed new plantings. As discussed in MR-2, 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. No changes to the EIR were determined to be necessary in response to this comment.</p>
JDA-5	<p>The commenter quotes text in the Draft EIR that indicates that Western Sycamore, California Buckeye, and Redwood trees should be preserved but then indicates that a presentation on September 30 indicated that these native trees are not being preserved. In addition, the commenter further indicates that a tree inventory should be provided.</p> <p>The exact trees to be removed through implementation of the project have not yet been determined. The County will prioritize the protection of these trees and will avoid their removal if feasible while also meeting the budgetary and design needs for the project. Retention of all individuals of an important tree species may not be possible due to several issues related to feasibility of retention. These include the excavation requirements for construction of the building and the relative proximity of the trees to the new building location, planned park accessibility improvements, and fire access requirements. The County will continue to refine the designs as the project develops to account for the most protections possible for native and community resources. This may include protection on individual tree species noted as important to the community and/or increases in replacement ratios for trees that are particularly valued by the community. 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. Refer to JDA-1, JDA-3, JDA-4 and <b>MR-2, Impacts to Native and Mature Trees</b>. No changes to the EIR were determined to be necessary in response to this comment.</p>

Comment No.	Response
JDA-6	<p>The commenter indicates that the project should preserve valuable tree species to fulfill the project's dedication to educating the public about extinction.</p> <p>While this is not a comment specifically on the analysis contained in the Draft EIR, it should be noted that native species have been prioritized in the plant palette and incorporated into the design where appropriate. The plant palette was developed based on the native vegetation of the Los Angeles Basin and was informed by research gathered from the La Brea Tar Pits fossil record. Furthermore, it should be noted that the plant palette also contains considerations for historical floral communities and pollinator resources. 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 resources. Refer to <b>MR-2, Impacts to Native and Mature Trees</b>. No changes to the EIR were determined to be necessary in response to this comment.</p>
JDA-7	<p>The commenter provides additional feedback requesting the retention of shade-producing trees. Refer to JDA-1, JDA-5, JDA-6, and <b>MR-2, Impacts to Native and Mature Trees</b>. No changes to the EIR were determined to be necessary in response to this comment.</p>
JDA-8	<p>The commenter requests that all new plantings should be native species.</p> <p>While this is not a comment specifically on the project's environmental impacts as contained in the Draft EIR analysis, it should be noted that native species have been prioritized in the plant palette and incorporated into the design where appropriate. The plant palette was developed based on the native vegetation of the Los Angeles Basin and was informed by research gathered from the La Brea Tar Pits fossil record. Refer to <b>MR-3, Use of Native Plants and Vegetation</b>. No changes to the EIR were determined to be necessary in response to this comment.</p>
JDA-9	<p>The commenter shares the opinion that the removal of the existing trees would diminish the available habitat for local bird species. They further provide their opinion that the project would create a contribution to wildlife extinction because birds rely on trees, especially native and mature trees.</p> <p>While tree removal can be significant, depending on the context, the proposed removal of trees at the La Brea Tar Pits site is not considered a significant impact on the environment. The environmental analysis contained in EIR Section 5.3, Biological Resources, is an accurate assessment of the potential for significant environmental impacts regarding tree and vegetation removal. Over the longer term, the habitat in the project area for migratory and native nesting birds, both sensitive and common, is anticipated to increase three to five years following construction, as the native plantings (which replace the removed trees) mature. These native plantings are much more desirable to native bird species than exotic and ornamental species. The landscaping palette will incorporate native trees, shrubs and herbs, providing a layered habitat that provides structure for a larger variety of native species than currently present. The temporary relatively small loss of trees relative to intact tree resources surrounding the project site and the implementation of nesting bird mitigation and replacement of plantings with native planting would reduce impacts to less than significant. Additionally, implementation of Mitigation Measure BIO/mm-5.1 would aid in the avoidance of impacts to nesting birds. Refer to response LAA-10 and <b>MR-2, Impacts to Native and Mature Trees</b>. No changes to the EIR were determined to be necessary in response to this comment.</p>
JDA-10	<p>The commenter provides their endorsement of the comments provided on the Draft EIR by the Los Angeles Audubon Society (Audubon).</p> <p>This is not a comment on the analysis contained in the EIR; therefore, a response is not necessary, and no changes to the EIR were determined to be necessary in response to this comment. However, responses to the Audubon letter can be found in this Final EIR in responses to comments LAA-1 through LAA-18.</p>

Comment No.	Response
JDA-11	<p>The commenter references a CEQA ruling regarding the Los Angeles Sidewalk Repair Program EIR where the Audubon and the City of Los Angeles Community Forest Advisory described ill effect on bird populations and migrations.</p> <p>Refer to response to comment LAA-10.</p> <p>The Sidewalk Repair Program proposed to streamline the sidewalk repair process across the entire City of Los Angeles, with the City allocating roughly \$1.3 billion towards sidewalk repairs over a 30-year period. If implemented, the project would result in the removal of an estimated 12,860 street trees.</p> <p>In the Sidewalk Repair case, the Superior Court noted that it is undisputed that the Sidewalk Repair Program would affect certain bird species, including sensitive species. However, the petitioner disagreed with the City that the EIR provided a proper and legally adequate analysis of the impact. As raised by petitioners and agreed to by the court, the issue in the Sidewalk Repair case concerns the City's dismissal of impacts of the project to birds other than sensitive species. On the merits of petitioners' claim, the City argued that it was not required to consider the impacts of the Sidewalk Repair Program on non-sensitive status species.</p> <p>Unlike the City's position in the Sidewalk Repair Program, the County is not arguing that there should not be consideration of the impacts to non-sensitive status species. In the La Brea Tar Pits Master Plan EIR, the County uses the Appendix G checklist questions to guide the biological resources analysis and, broadly, uses the checklist questions as thresholds of significance. However, this does not mean that the County improperly limited its analysis to sensitive species. As provided for in EIR Section 5.3, Biological Resources, impact question (d), the EIR addresses effects of the project on non-sensitive species. Further, additional clarifying text has been added to the EIR to expand upon this consideration of non-sensitive species.</p> <p>Further, the commenter does not provide any substantial evidence to indicate why they believe the circumstances of the Sidewalk Repair Program should be seen as equivalent or related to the La Brea Tar Pits Master Plan project. While both projects would result in the removal of trees which could potentially impact local bird species, as noted above, the Sidewalk Repair Program EIR proposed to include the removal of 12,860 trees across Los Angeles, which is several magnitudes larger than the 150 to 200 trees proposed for removal or replacement by the proposed project.</p> <p>For all the reasons noted above and described in more detail in EIR Section 5.3, Biological Resources, of the EIR, impacts to non-protected bird species by the implementation of the La Brea Master Plan would be considerably less than the impacts posed by the Sidewalk Repair Program. While the necessary tree removal proposed by the project may result in a temporary reduction in bird occurrence and viable habitat, the cumulative impact of the new native trees and plant species would eventually increase the amount of bird habitat supported by the site. Replanting of trees should result in no temporal loss of habitat for those individuals, while planting of new native shrubs should provide habitat within 2 to 3 years and trees in 5 to 10 years.</p>
JDA-12	<p>The commenter raises issues with a different development/building located outside of California that is not associated with the proposed La Brea Tar Pits Master Plan.</p> <p>Refer to response to comments LAA-4 through LAA-8. The illustrations and images provided in the Master Plan and Chapter 3, Project Description, of the EIR were not intended to imply the use of a specific type of material or amount of glass surface to be incorporated into the project design; they are conceptual illustrations developed early in the Master Plan design process. The following language has been added to Chapter 3, Project Description (added text shown in underline):</p> <p><u>"To significantly reduce birds from striking or colliding with the building, new construction would include deterrent features on glass barriers, windows, and building elements likely to present imperceptible barriers for avian species. These features would include ceramic frit patterns and/or other features that meet the criteria from the American Bird Conservancy for bird friendly glazing."</u></p> <p>The County will continue to refine the project designs to decrease the extent of glazing and the need for bird deterrence. As more detailed construction documents are developed, appropriate bird deterrence methods will be studied and incorporated further to significantly reduce bird strikes resulting in mortality or injury.</p> <p>After receiving comments on the Draft EIR, the County considered the comments made by the commenting entities, including Audubon, and refined the design of the improvements proposed at the La Brea Tar Pits site. As a result, the County has proposed a variation of the Master Plan alternative. Refinements to the project will continue to be considered by the County as the design evolves. Refer to <b>MR-1, Preferred Alternative</b>, for more information regarding the additional information provided by the updated designs and Refined Alternative 3.</p>

Comment No.	Response
JDA-13	<p>The commenter alleges that the Draft EIR was due in the fall of 2022, so it is a year late and implied that the project has gone too far in that time. Further, the comment provides conjecture about what will happen regarding project approval (specifically, the commenter states “the excuse will be that the design has reached a point of no return”). The comment goes on to allege that the public was not heeded during scoping and afterward they were told to hold off objections until the EIR.</p> <p>The comment includes several inaccuracies and allegations that are not correct.</p> <p>While there was an estimated schedule presented to the public at the scoping meeting (held on March 2, 2022), this was not intended to be a due date. It is accurate that the County took additional time to complete the Final EIR beyond the estimate presented at the scoping meeting. Nonetheless, this will not affect whether the project is approved. The design of the project continues to undergo refinement; it is undetermined whether the Board of Supervisors will direct refinements to the design. While the commenter theorizes on what they believe the determinations of the County will be on the project, the commenter provides no substantiation of this theory.</p> <p>The comment stating that the public was not heeded during scoping is unclear. The comment does not provide specific information on how the public was not heeded. The County received input at the scoping meeting that was held on March 2, 2022. In addition, the County received specific comments in response to the Notice of Preparation (NOP), which was published on February 14, 2022. The purpose of scoping and the NOP was to seek input from public agencies and members of the public on the intended scope and contents of the environmental information and analysis in the EIR. The County used this information to define the scope of the EIR. While the commenter does not provide specific information regarding what aspect of comment provided during the scoping process was not addressed, it is important to note that the County is not obligated to necessarily accept every opinion or project preference that is provided in the scoping comments. Instead, the scoping process is a procedural process to ensure that input into the scope of the EIR analysis is attained. A summary matrix of written comments received during the NOP comment period as well as verbal comments recorded at the two public scoping meetings is provided as Appendix A to the EIR.</p> <p>The commenter does not provide any specific information about when they received this feedback, who dissuaded them from preparing comments on the project, or any other details regarding their experience of being told not to provide comments. These details are unclear from the information provided by the commenter. The County aware of any Foundation, County, or County consultant directing members of the public to “hold off objections until the EIR,” as alleged by the commenter.</p> <p>The County encourages members of the public to provide input into the design of the project. The County also 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.</p>
JDA-14	<p>The commenter requests that alternatives to the current project design be considered.</p> <p>Chapter 6, Alternatives Analysis, of the EIR provides the required CEQA analysis of alternatives. The County will be recommending approval of Refined Alternative 3 by the Board of Supervisors. Refer to <b>MR-1, Preferred Alternative</b> and <b>MR-2, Impacts to Native and Mature Trees</b> for more information. No changes to the EIR were determined to be necessary in response to this comment.</p>

## 2.4.25 Marianne King

From: **Marianne King**  
Date: Thu, Oct 26, 2023 at 3:39 PM  
Subject: Public Comment On Proposed La Brea Tar Pits Master Plan Project  
To: Leslie Negritto, <[reimagine@tarpits.org](mailto:reimagine@tarpits.org)>

Dear Chief Operating Officer Negritto,

I absolutely agree with the concerns raised by the Neighborhood Council Sustainability Alliance (NCSA) letter dated October 26, 2023 (attached herein). There needs to be an arborist report that quantifies the existing trees on site, including all the important data, size, height, species, condition, and each tree numbered and referenced on the existing and proposed landscape plans. The DEIR as presented regarding existing trees and what will happen to them is wholly insufficient. And the footnote, oh, we'll address that after the EIR? In addition there is inconsistent comments about how many trees exist and what the "plan" is. Please see attached examples highlighted in yellow.

┌ MK-1

└ MK-2

Please take the time to come up with a real tree preservation plan.

┌ MK-3

Sincerely,

Marianne King

Tree Preservation Advocate, former Los Angeles City Planner.





October 26, 2023

Leslie Negritto, Chief Operating Officer  
Natural History Museums of Los Angeles County  
900 Exposition Boulevard  
Los Angeles, California 90007  
Via e-mail: lnegritto@nhm.org, reimagine@tarpits.org

RE: Public Comment On Proposed La Brea Tar Pits Master Plan Project

Dear Chief Operating Officer Negritto:

The Neighborhood Council Sustainability Alliance (NCSA) has important concerns with the environmental impact of the Master Plan Project as presented by the Natural History Museums of Los Angeles County (NHM) to expand the Page Museum and facilities at the La Brea Tar Pits. Over the course of the past two years, objections have been voiced to project representatives regarding mature tree loss—especially native tree and other native plant removals that are crucial to the ecosystem. Many individual objections came from members of the NCSA Trees Committee who are versed in the value of these assets. Yet these concerns have had no discernible influence on the project.

We question why this DEIR is offered without a tree inventory, and why it provides no specific disclosure of which trees would be removed and which retained? These are standard elements of a CEQA document, and their absence leads us to challenge how this EIR can be accepted without this disclosure.

A representative of the NCSA Trees Committee who attended your September 30 outreach event and walked the site had positive engagement with several Gruen Associates including architect Debra Gerod and also members of the landscape design team including Ronnick Licudo and Nicholas Decker. The latter two representatives were joined by another associate, Dean Howell, at our NCSA Advocacy meeting of October 1.

Below we take issue with the environmental evaluation of the Master Plan Project as presented. Text from the DEIR is cited. A numbered list of minimum expectations for the project is presented later in this comment letter.

From the DEIR Appendix B p. 29:

*Existing trees and plantings throughout the park are scattered and achieve little sense of character or unity. The enhanced character of the park will require new plantings as well as existing trees and plantings that complement the concept design. Species such as the Western Sycamore, California Buckeye, and Redwood should be preserved.*

With the current heat crisis in Los Angeles, we need to retain every shade-producing tree. Replacement planting deprives the City of ecosystem services for 20 years while trees attain maturity. Dr. Beverly Law, Emeritus Professor of Global Change Biology, explains how new trees initially add carbon to the atmosphere and only mature trees sequester carbon, one of the chief environmental benefits from trees.†

Given the benefits of mature trees, the "character and unity," stated in the above quote from the DEIR, should not be the deciding factor for tree elimination. While the palms and agaves at the project site may be expendable, there are numerous shade trees that should be preserved but will not be in this Master Plan. Even more disturbing, the DEIR says, "Western Sycamore, California Buckeye, and Redwood should be preserved" BUT ACCORDING TO THE PRESENTATION ON SEPTEMBER 30, THESE VALUABLE NATIVE TREES ARE NOT BEING PRESERVED, AND THIS IS NOT REVEALED IN THE

MK-4



DEIR. If the DEIR says native trees "should be preserved," then it should begin with an inventory of all these native trees / shrubs and demonstrate how the project will design around them. It is ironic that a project that is dedicated to educating the public about extinction does not begin with a mandate to preserve valuable specimens of extant but rare native trees and other native plants. Select highly precious native tree specimens on the Tar Pits site are cited in section 2) of this comment letter below.

From the DEIR Appendix B p.19:

*A picnic area under the canopy and shade trees provides new programming opportunities, from outdoor education and school lunches to orientation and gathering.*

Again, new trees provide no appreciable shade for 20 years. At the picnic area there is an opportunity for tree preservation if the construction company is mandated to protect existing valuable trees. These trees border construction, and the builders must be sensitive to protecting existing trees instead of relying on a "planting plan." Tree preservation requires expert supervision to avoid harm to the trees.

From the DEIR Appendix B p.28:

*A woodland zone along the park's peripheral edges (northern, southern, eastern, and western) provides shade to the picnic areas and the parking lot to the north. These landscape zones are designed to maximize space for community, creating opportunities for the public to engage with the site's natural history and create a distinctive identity for the park to help tell La Brea's story. The planting scheme addresses the realities of Los Angeles's current and projected climate and aims to ease water consumption, ensure appropriate maintenance, promote sustainable growth, and provide a model for resilient site planning in the area.*

A museum dedicated to studying past extinctions should mitigate future extinctions by committing that **EVERY new plant and tree will be native**. Experts like Doug Tallamy, PhD professor in the Department of Entomology and Ecology at the University of Delaware, author of 80 research articles and 4 bestselling books, spoke at the City of Los Angeles Community Forest Advisory Committee in the October 2023 meeting, telling us we must plant native in cities in all planting spaces. Other ecologists concur:

*Native plants play a very important role in our ecosystems. As ecologists, wildlife biologists and entomologist have shown, native plant species are more favorable for supporting local wildlife, including insects such as bees and butterflies, amphibians, reptiles, and mammals. Native plants feed the creatures at the bottom of the food web that then provide meals for creatures on the next ring of the web, such as the birds.††*

We believe there are specific adjustments to the landscaping plan that will improve the sustainability, historical value, and cultural significance of the project. Accordingly, we request that the following changes be incorporated into the design.

1) Allow biofiltration areas to recharge groundwater and irrigate lawn.

As outlined in DEIR Section 3.4.7.2, the three biofiltration spaces will be lined with an impermeable liner, and water will be routed to the city stormwater drains. This is a missed opportunity. Central to the function of a true bioswale is the absorption of water for groundwater recharge. This can only be accomplished if the bioswale (or biofiltration planter) does not reside over an impermeable barrier. Therein, an unlined or partially unlined bottom in each of the three biofiltration spaces would have greater benefit to the community and the urban ecosystem by allowing some groundwater recharge. Of particular significance is that Oil Creek is a naturally occurring spring that is a fundamental component of the very system and unique phenomenon that the park celebrates. To add impermeable barriers to such a system undermines the functionality of a unique historical site, diminishing its educational value and threatening

MK-4  
(cont'd)

the existence of the Oil Creek spring. Importantly, it is counterintuitive to use natural systems to filter onsite water, only to dump it back into the city stormwater drain system, where it will be polluted again before reaching our local watershed. Certainly any flooding concerns could be addressed with overflow drainage in the bioswale and bioplanter designs. Groundwater flow is an inherent element of Oil Creek.

The immense footprint of grass lawn in the project underscores the need to utilize onsite water sources rather than dumping naturally cleaned water into the stormwater drain. Overflow water cleaned by the biofiltration spaces should be captured as an irrigation source to offset the significant impact of using potable water to irrigate the grass lawn in the project.

2) Redesign the landscaping plan to save / incorporate four historically significant tree specimens.

The area to the northwest of the current Central Green, south of the current Pleistocene garden, contains two old-growth *Rhus ovata* (Sugarbush) and one old-growth *Heteromeles arbutifolia* (Toyon). These are visible (albeit difficult to identify) in Existing Site Figure 3-3 in the DEIR. We believe the two *Rhus ovata* are the largest specimens in the City of Los Angeles and among the largest in existence for this regionally local species. Likewise, the *Heteromeles arbutifolia*, a species declared the official native plant of Los Angeles by City Council in 2012 and a protected tree species via Los Angeles Ordinance 186873, has historical and cultural significance. A 1924 overhead photo of the site in the Los Angeles Public Library archives shows probable evidence of these three trees existing on the site a century ago. Further northwest of these three trees, north of Oil Creek and a few feet northwest of the current Pleistocene garden, is an exceptional example of *Aesculus californica* (California Buckeye) that also carries significance as being among the largest examples in the City of Los Angeles. Though the DEIR lacks a tree inventory and specifics on exactly which trees will be preserved, preliminary documents suggest all four of these trees are slated for removal. Due to their age and size, these four trees are poor candidates for survival if moved, even if the large expense and effort to do so was undertaken. However, an overlay of the Conceptual Site Plan in Figure 3-4 onto Figure 3-3 suggests these four trees are outside the proposed new building footprint and could be accommodated and preserved with minor alterations to the landscaping design.

Consider that the project site also includes two mature *Sequoia sempervirens* (Coast Redwood), two mature *Umbellularia californica* (California Bay Laurel), and several mature *Pinus torreyana* (Torrey Pine). These native trees are among the largest trees on the site, and a superior plan would have designed around them. *Umbellularia californica* is a protected species in Los Angeles and *Pinus torreyana* is an endangered species that is the rarest pine species in the United States. However, because they are within the footprint of a new building in the DEIR, we don't see how they can be saved without a major redesign of the project. The loss of these trees will constitute a significant harm to the ecosystem of the area and the cultural heritage of the region. This makes it all the more imperative that the four trees listed in the prior paragraph (which can be saved with comparatively minimal effort) be saved.

3) Removal of any native tree protected by Los Angeles Ordinance 186873 should result in the full 4:1 replacement ratio planted on site within the project boundaries.

Though this is a County facility, it is situated in the City of Los Angeles, which has a Protected Tree Ordinance in place to discourage the removal of native trees and shrubs. The fact that the Tar Pits are a County facility is insufficient reason to ignore City law supported by the stakeholders of the community. The existing site contains multiple healthy mature specimens of these five protected tree species (*Heteromeles arbutifolia* (Toyon), *Platanus racemosa* (Western Sycamore), *Umbellularia californica* (California Bay Laurel), *Sambucus mexicana* (Blue Elderberry), and *Juglans californica* (Southern California Black Walnut)) and one protected tree genus *Quercus* (Oaks) of native origin as defined in Los Angeles Ordinance 186873. Many of these are slated for removal. The project site is noteworthy for having all these species in a relatively small area that is easily walkable and accessible, and

MK-4  
(cont'd)

consequently serves as an extremely valuable education tool in addition to having the biodiversity benefits these native trees provide. Section 3.4.7.1 of the DEIR estimates that 135 to 180 trees (including many non-native trees) in the existing site will be removed, assuming the calculation that an additional 10 percent will be relocated. This is a significant loss of mature tree canopy for the community, with decades-long loss of shade, carbon capture, and heat-island effect offset. Installing the full 4:1 replacement ratio of our protected species on site as part of the new design is an important long term mitigation to these losses.

4) The removal of any *Berberis nevinii* (Nevin's Barberry) should also result in a 4:1 replacement ratio planted on site within the project boundaries.

*Berberis nevinii* is a federally and state listed endangered species. Several large, mature examples of this shrub are at the existing site, specifically within the current Pleistocene garden—an area slated for removal in current plans. Though these plants were planted by humans, they are well established at the location. The new plant palette designs in Figures 3-12, 3-13, and 3-14 of the DEIR do not include plans for *Berberis nevinii*. While relocation of the existing on site mature shrubs is technically possible, this may have a low success rate beyond the short term. By incorporating new plantings of this species into the design, a long term presence for this endangered species can be secured.

5) All new plantings, other than functional lawn, must be native species, with a preference for species from the tar pits fossil record.

The original vision of this park as articulated by naturalist Theodore Payne and landscape architect Ralph Cornell over a century ago was to feature an exclusively native plant habitat. This project offers a singular opportunity to bring that vision closer to reality, and there are extremely important reasons to do so. Los Angeles is experiencing a biodiversity crisis, having lost over 90% of our local pollinators since the beginning of the twentieth century. Key Lepidoptera species (butterflies and moths) are disappearing to extinction at the rate of two regional species per year. Because many specialist fauna depend on the native plants with which they have evolved, native landscaping plants and trees provide essential support for local biodiversity. There is not a better case for an all-native urban landscaping design than that of Hancock Park in the La Brea Tar Pits Master Plan Project, a space noteworthy for being the most important Pleistocene fossil site on the planet. The tar pits have established a fossil record with tens of thousands of years of evidence of our native plants surviving climate change and varying carbon levels that exceed those anticipated from anthropogenic climate change. These changes were a factor in wiping out the famous megafauna displayed in the Page Museum at the tar pits, yet our surviving local native plants endured these changes.

As a demonstration of the power of adaptability within the DNA of our local native plants in our unique biodiversity hotspot, the project site has unparalleled importance as an education tool for climate change and biodiversity, but only if the landscaping design utilizes those native plant species. Happily, the creators of the DEIR document seem to get this, as all the proposed species in Sections 3.4.7 and 3.4.7.1 and the aforementioned Figures of the DEIR exclusively reference native species. However, suggested plant palettes are different from actual detailed landscaping plans. In conversations with several members of the landscape design team, our members were repeatedly told that new landscaping installations would be "90 to 95 percent native" with some members of the design team going on to mention plans to install multiple exotic trees such as *Tipuana tipu*. There is no scientific, cultural, or practical justification for including non-native tree species in the planting palette of this project. With well over 70 locally native tree and shrub species and hundreds of local herbaceous plant species providing ample choices for both drought resistant landscaping as well as the project's riparian biofiltration areas, no credible argument can be made that it is biologically valuable or necessary to add more ornamental non-native species to this site (a site that will still contain over 100 mature non-native trees slated for preservation in the current plan).

MK-4  
(cont'd)

Furthermore, even the "90 to 95 percent" natives suggested by designers is greatly misleading. Consider that a large percentage of the 13 acres in both the existing site and proposed site in the DEIR consists of non-native grass species for open lawn. Thus, the native percentage estimate by designers omits the lawn that will constitute the highest percentage of planted biomass for the project. While lawn has a functional green space value for the community, the ornamental landscaping trees and other non-lawn plants added to this site, going forward, should be exclusively native in recognition of the historical significance of the plants in the fossil record that make this site a true treasure for the local community, region, and world.

Thank you for this opportunity for public comment. We hope the NCSA, an alliance that includes members with extensive ecological and native plant expertise, can serve as an advisor on this project as it moves forward. We applaud NHM for its ambitious goals in this exciting endeavor.

Sincerely,

The Neighborhood Council Sustainability Alliance of Los Angeles  
[www.ncsa.la](http://www.ncsa.la)

cc: [HollyJMitchell@bos.lacounty.gov](mailto:HollyJMitchell@bos.lacounty.gov)  
[FourthDistrict@bos.lacounty.gov](mailto:FourthDistrict@bos.lacounty.gov)  
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† <https://www.youtube.com/watch?app=desktop&v=LDdKOmvIKyg&feature=youtu.be>

†† <https://www.ecolandscaping.org/native-plants/>

MK-4  
(cont'd)

La Brea Tar Pits Master Plan Draft Environmental Impact Report  
Section 5.10 Land Use and Planning

Table 5.10-7. Preliminary Project Consistency Evaluation—SCAG 2020-2045 RTP/SCS

Goals and Principles	Analysis of Project Consistency
Goal 5. Reduce greenhouse gas emissions and improve air quality	<b>Consistent with Mitigation.</b> The project would not conflict with the GHG reduction policies strategies and regulations of this plan; however, to further reduce the project's potential GHG emissions, the project would implement Mitigation Measure TRA/mm-1.1 requiring development of a Transportation Demand Management (TDM) program with specific strategies aimed to reduce project employee and visitor vehicle trips and increase alternative modes such as walking, bicycling, public transit, and ridesharing. In addition, Mitigation Measure GHG/mm-1.1 would ensure the project would not include the installation of natural gas infrastructure. In addition, Mitigation Measure GHG/mm-1.1 would ensure the project provides more electric vehicle charging stations than the mandatory requirements set forth in the Los Angeles County Code, Title 31, Green Building Standards (Code Section 5.106.5.3.3). Further, Mitigation Measure AQ/mm-3.1 would require all SCAQMD rules and regulations to serve as mitigation measures for the project during construction. Operation of the project would not result in adverse impacts to air quality.
Goal 6. Support healthy and equitable communities	<b>Consistent.</b> The project would support the health of visitors by improving existing and creating new outdoor public spaces and improved landscaping that would support visitors and employees' mental health, encourage community interaction, and improve air quality. The project would also encourage pedestrian mobility via the proposed easily accessible paved pedestrian path linking the existing elements of the site. Each loop of the pathway would contain distinct themes and programming. The new museum building design would use sustainable design features such as enhanced daylighting, rainwater collection leading to bioswales, and a sloped green roof.
Goal 10. Promote conservation of natural and agricultural lands and restoration of habitats	<b>Consistent with Mitigation.</b> The project site is dominated by a large lawn surrounding the museum consisting of primarily non-native planted trees and shrubs. It provides limited wildlife habitat due to the combination of high levels of human activity, the lack of surface water, and the low quantity of native plants. However, there are currently over 300 trees on-site, both non-native and native species, including the Coast live oak which is a species protected under the Los Angeles Oak Tree Ordinance. The Master Plan's proposed planting strategy includes the introduction or relocation of 150 to 200 trees on-site. Tree species selected for planting would be drought-tolerant and/or of a native tree species and would primarily require moist to dry soil conditions. The trees provide potential nesting habitat for birds as well as in the native plant area of Oil Creek. Oil Creek supports a community of hydrophytic and riparian vegetation. The project would be required to implement the following mitigation measures to protect and preserve the biological resources on-site: BIO/mm-2.1 to protect sensitive and regulated resources at and along Oil Creek; BIO/mm-3.1 to protect sensitive and regulated resources at and around the Lake Pit; BIO/mm-4.1 and BIO/mm-4.2 to avoid impacts to nesting birds; and BIO/mm-5.1 and BIO/mm-5.2 to avoid conflicts with the County of Los Angeles Oak Tree Ordinance.

### 5.10.3 Thresholds of Significance

The following thresholds of significance are based on the Environmental Checklist contained in Appendix G of the State CEQA Guidelines. A project could result in significant adverse environmental impacts related to land use and planning if it would:

- Physically divide an established community.
- Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

### 5.10.4 Methodology

Sources used in the assessment of land use and planning impacts include the County's General Plan, the City's General Plan, the Wilshire Community Plan, and the 2020-2045 SCAG RTP/SCS. The project's potential consistency with relevant County and City General Plan policies are evaluated in Table 5.10-4 through Table 5.10-7. Only project elements that have the potential to conflict with an applicable goal,

5.10-28

MK-4  
(cont'd)

La Brea Tar Pits Master Plan Draft Environmental Impact Report  
Section 5.10 Land Use and Planning

Goals, Policies, Plans, Programs, and Standards	Preliminary Consistency Determination
<b>Policy LU 11.2</b> Support the design of developments that provide substantial tree canopy cover and utilize light-colored paving materials and energy-efficient roofing materials to reduce the urban heat island effect.	<b>Consistent.</b> The Master Plan's proposed planting strategy includes the introduction or relocation of at least 150 to 200 trees on-site. <sup>2</sup> Tree species selected for planting would be drought-tolerant and/or of a native tree species and would primarily require moist to dry soil conditions. The project's contribution to the urban heat island effect would be minimal due to the surrounding existing park and recreational areas, including Central Green, and the proposed site design and landscaping plan, which includes a canopy of shade trees for the entry plaza at Wilshire Gateway and 6th Street Gateway. Additionally, photovoltaic solar panels would be installed on the roof of the Page Museum along with sloped green roofs to reduce building heating during the day. In addition, refer to the consistency analysis for Policy LU 10.4.
<b>Policy LU 11.3</b> Encourage development to optimize the solar orientation of buildings to maximize passive and active solar design techniques.	<b>Consistent.</b> The project would maximize solar design techniques by adding extensive sustainability features to the Page Museum, including a sloped green roof and rooftop solar photovoltaic panels.
<b>Policy LU 11.7</b> Encourage the use of design techniques to conserve natural resource areas.	<b>Consistent.</b> See the consistency analysis for LU 11.2.
<b>Mobility Element</b>	
<b>Goal M 2</b> Interconnected and safe bicycle- and pedestrian-friendly streets, sidewalks, paths and trails that promote active transportation and transit use.	<b>Consistent with Mitigation.</b> The project would include the implementation of a paved pedestrian path within the project site that would be accessible to members of the public during park operating hours. The project site is currently served by a complete network of sidewalks around the project site block and adjacent street network, with signalized intersections and crosswalks. The project would not involve changes to the existing bikeways or introduce features that would remove pedestrian facilities or increase pedestrian crossing distances. In addition, the project would implement Mitigation Measure TRA/mm-1.1, requiring development of a Transportation Demand Management (TDM) program to coordinate on multimodal improvements in the study area and to reduce employee and visitor vehicle trips and related effects on project access safety and circulation.
<b>Policy M 2.6</b> Encourage the implementation of future designs concepts that promote active transportation, whenever available and feasible.	<b>Consistent.</b> See the consistency analysis for Goal M 2.
<b>Air Quality Element</b>	
<b>Goal AQ 1</b> Protection from exposure to harmful air pollutants.	<b>Consistent with Mitigation.</b> Mitigation Measure AQ/mm-3.1 would ensure that the project would not result in harmful air pollutants that would exceed the localized South Coast Air Quality Management District (SCAQMD)-recommended localized significance thresholds during construction or operation. In addition, the project would also implement Mitigation Measure HAZ/mm-2.1 requiring additional controls to address the effects of subsurface hazardous materials that may be present, including methane.
<b>Policy AQ 1.1</b> Minimize health risks to people from industrial toxic or hazardous air pollutant emissions, with an emphasis on local hot spots, such as existing point sources affecting immediate sensitive receptors.	<b>Consistent.</b> The project's construction activities would not expose sensitive receptors to localized emissions concentrations in excess of SCAQMD standards. In addition, the project would not result in operational impacts that would expose sensitive receptors to localized emissions concentrations in excess of SCAQMD standards, increase the cancer risk, increase the cancer burden, or create any carbon dioxide hot spots.
<b>Policy AQ 1.2</b> Encourage the use of low or no volatile organic compound (VOC) emitting materials.	<b>Consistent with Mitigation.</b> Mitigation Measure AQ/mm-3.1 would require adherence to SCAQMD Rule 1113, which limits the VOC content of architectural coating and other emitting materials.

<sup>2</sup> The La Brea Tar Pits Master Plan does not provide an exact number of trees to be relocated versus new trees introduced to the site. The Los Angeles County Museum of Natural History Foundation will develop additional detail when the construction plans are more fully developed, likely after the CEQA process is complete.



Historic Resources Technical Report  
La Brea Tar Pits Master Plan Environmental Impact Report, Los Angeles

### **Pedestrian Path and Recreation**

The project would reconfigure the existing pedestrian pathways on-site into a continuous 1-kilometer paved pedestrian path linking the disparate existing elements of the site: the Lake Pit and Wilshire Gateway in the southeast, Central Green, museum, tar seeps, and 6th Street Gateway in the northwest. The path would feature three distinct loops, each one reflecting distinct themes (Figure 12).

The Central Green would be at the center of the project site, directly to the southwest of the Page Museum and new museum building. This large common grass lawn provides a setting for community activities, recreation, events, and public gathering. The project would improve the infrastructure to create a drivable path for food trucks to access the Central Green. To the west of the 6th Street Gateway, the project would add a children's play area, picnic areas, and a small dog park. Vegetated berms around recreation areas would create seating areas and elevated vantage points.

### **Landscaping**

As shown in Figure 13, the planting and landscaping concept for Hancock Park is divided into three distinct zones encircled by the looping path system. Each loop of the pedestrian path has its own usage and distinguishing theme representing different geologic epochs—Pleistocene in the southeastern loop, Holocene in the northwestern loop, and Anthropocene in the central loop. As noted above, the Pleistocene Garden would be approximately 10,000-11,000 square feet in size, located directly east of the Lake Pit, and incorporate a biofiltration area to help manage stormwater. It would be planted with herbaceous and woody species. The western loop would consist of a Holocene landscape with climate-appropriate native plantings to ease water consumption, ensure appropriate maintenance, and promote sustainable growth. A forested woodland consisting of Torrey Pine and Coast Live Oak would be planted with the intention of providing a focal area and shade. The western loop also contains Oil Creek, which will be developed into a biofiltration zone for stormwater management and would be planted with Sequoia and Monterey Pine trees in wetter pockets. The Central Lawn would be a common lawn.

The woodland forest zone of the western loop would be extended along the park's peripheral edges (northern, southern, eastern, and western) to provide shade to the picnic areas and the parking lot to the north. Tree species are expected to include Torrey Pine, Coast Live Oak, Western Sycamore, and Valley Oak and would support the development of a unified canopy across the site.

As stated above, there are 197 trees currently on the project site. The planting strategy includes the introduction or relocation of approximately 84 trees on-site. The relocated trees would be from existing locations within the project site. New plantings would be consistent with the planting and landscape concept and plant palette included in the Master Plan. New plantings would be selected for resilience to disease and with consideration for their ability to create shaded areas at the park. Trees that would be removed include non-native trees and/or trees that have been diseased or are not in good health. Species such as the Western Sycamore, California Buckeye, and Redwood would be preserved, unless they are diseased or in locations where new built features are planned, specifically the museum expansion and shifted parking lot on the northern side of the site. If healthy, these trees could be moved to the west of the parking lot, adjacent to the maintenance and support building.

At this juncture of the planning process, a tree assessment and landscaping plan have not been developed. More detailed plans for tree removal and planting would not be developed until after the EIR is completed.

MK-4  
(cont'd)

### 2.4.25.1 Response to Letter from Marianne King

Comment No.	Response
MK-1	<p>The commenter provides their endorsement of the comments provided by the Neighborhood Council Sustainability Alliance and raises concerns regarding the lack of a tree inventory in the Draft EIR and the number of trees to be removed as a result of the project.</p> <p>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.</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 commenter is correct that the EIR does not provide identification of the exact trees to be removed through implementation of the project. However, the implication that this is required for a CEQA document is not correct. The project description for the EIR only needs to include the information necessary to conclude a project's potential for significant environmental impacts. The full range of potentially significant biological resource impacts, including those to trees, is provided in the EIR in Section 5.3, Biological Resources. The thresholds of significance address the full range of impacts that could occur with the project, including impacting tree specimens protected by local ordinances. In this case, the property is on County of Los Angeles land.</p> <p>The exact trees to be removed through implementation of the project have not yet been determined. The County is prioritizing the protection of as many trees as possible, while also meeting the budgetary and design needs for the project. However, many trees would not be able to be retained due to several issues related to feasibility of retention. These include the excavation requirements for construction of the building and the relative proximity of the trees to the new building location, planned park accessibility improvements, and fire access requirements.</p> <p>While tree removal can be significant, depending on the context, the proposed removal of trees at the La Brea Tar Pits site is not considered a significant impact on the environment. The environmental analysis contained in EIR Section 5.3, Biological Resources, is an accurate assessment of the potential for significant environmental impacts regarding tree and vegetation removal. Furthermore, any visual impacts related to tree removal is appropriately discussed within EIR Section 5.1, Aesthetics. 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. Refer to <b>MR-2, Impacts to Native and Mature Trees</b>, for further information. No changes to the EIR were determined to be necessary in response to this comment.</p>
MK-2	<p>The commenter states that there are inconsistencies in regarding the exact number of trees to be removed by the project and provides several highlighted pages of the Draft EIR and the Historic Resources Technical Report that provide counts of the existing trees, anticipated numbers of trees to be removed, and the proposed tree planting strategy outlines by the proposed project.</p> <p>On the pages provided by the commenter, all the pages, except one, provide the correct information. All pages provided of the September 2023 Draft EIR correctly indicate that there are over 300 trees on-site. More specifically, as documented on page 3-8 of the EIR (Chapter 3, Project Description), more than 330 trees are currently on the project site. The project would require removal and replacement and/or relocation of between 150 and 200 trees. The planting strategy includes the planting (introduction or relocation) of a similar number of trees as would be removed. It is estimated that <u>up to</u> 10 percent of the 150 to 200 trees to be removed would be relocated rather than replaced. The citations have been verified in the main body of the EIR.</p> <p>The last page of highlighted text provided by the commenter is from page 16 of the Historic Resources Technical Report, which is provided as an appendix to the EIR (Appendix D). This report was published in January 2023, which is eight months prior to the main body of the EIR. Between January and September 2023, the County and the design team provided updated information regarding trees. Because the count of trees does not affect the findings of the historic analysis, the County elected to not update the count of trees contained in the January 2023 Historic Resources Technical Report. The environmental analysis contained in EIR Section 5.3, Biological Resources, is an accurate assessment of the potential for significant environmental impacts regarding tree removal. Refer to <b>MR-2, Impacts to Native and Mature Trees</b>, for further information regarding the effects of the proposed project on native and mature trees and the proposed tree planting plan. No changes to the EIR were determined to be necessary in response to this comment.</p>
MK-3	<p>The commenter states that a tree preservation plan should be prepared.</p> <p>Refer to response to comment MK-1 above. The County is prioritizing the protection of as many trees as possible while also meeting the budgetary and design needs for the project. No changes to the EIR were determined to be necessary in response to this comment.</p>
MK-4	<p>The commenter has attached the letter from the Neighborhood Council Sustainability Alliance. Please refer to responses to comments NCSA-1 through NCSA-28. No changes to the EIR were determined to be necessary in response to this comment.</p>



## 2.4.26 Ann Rubin

From: **Ann Rubin**  
Date: Thu, Oct 26, 2023 at 5:27 PM  
Subject: RE: DEIR for LA Tar Pits Master Plan Project - SCH #2022020344  
To: Leslie Negritto

Leslie Negritto, Chief Operating Officer  
Natural History Museums of Los Angeles County  
900 Exposition Boulevard  
Los Angeles, California 90007

RE: DEIR for LA Tar Pits Master Plan Project - SCH #2022020344

Dear COO Negritto and Natural History Museum team,

In March 2022, I submitted a letter expressing my three concerns in response to public scoping meetings for the La Brea Tar Pits remodeling project. Prior to that, as well as in the period since, I have joined other residents and concerned citizens in making similar comments to Dr. Richard Hayden and other museum representatives. I am disheartened that our public input doesn't seem to have had much impact, based on information in the DEIR.

AR-1

I live a few blocks west of the Tar Pits in Carthay Circle HPOZ. I grew up to the east of Highland and frequently visited the Tar Pits and LACMA as a youth. For fun — and to underscore that I care and have great regard for the area — I attach a family photo from probably 1965. I am the kid in the middle.

This location has always been an invaluable green area for residents and that's more important than ever with increasing density on Wilshire Blvd. — with proposed Dubai-high 50-story buildings — and LACMA's sprawled redevelopment, including a concrete structure over Wilshire Blvd. Roof top amenity decks with trees and apartment balconies with potted plants are not adequate substitutes for nature at the ground level and in the ground. The area is already quite dense with historic and newer multi-tenant buildings. The park is critical to quality of life and healthy living here. We need a cool, green park with mature tree coverage as respite to air-conditioned living and our heat island.

AR-2

My primary concerns are now five:

1) We must save more or all of the mature, large shade trees proposed for removal, including native species and rare and historically significant examples. This is in keeping with the educational work of the institution. Park and building plans should incorporate more or all of the existing trees for the sake of the environment, our health, our non-commercial communal life, and our sense of place. Planting new trees means decades will pass before they can provide the same benefits in terms of shade, cooling, cleaning our air, buffering sound, and habitat for wildlife.

AR-3

2) The design needs more trees for shade over pedestrian pathways, including around the perimeter for comfortably walking to and from the new subway stop. Trees should be native to maximize ecological benefits and minimize water demands and to set an example for teaching purposes.

AR-4

3) The plan needs to eliminate the proposed light blight at night. Please don't add more artificial light that would mar our beautiful night sky with the stars and moon. With the growth of high-rises and commercial buildings on Wilshire Blvd. and LED technology, this struggle to reduce superfluous and polluting artificial light is a serious challenge. The neighborhoods here need the advocacy of the NHM on this issue — in terms of their own building, as well as insisting that the adjacent luxury apartment on Curson remove the decorative ring of light on its top floor.

AR-5

4) The redevelopment of the park and structures must prioritize the safety of birds. Again, this is in keeping with institution's purpose and relates to maintaining the existing tree canopy and preference for CA natives in new plantings.

AR-6

5) The plan is concerning in how drainage water will be sent to the ocean, instead of being filtrated back into the ground and used for park irrigation in a sustainable process.

AR-7

Thank you for your consideration,

Ann Rubin



## 2.4.26.1 Response to Letter from Ann Rubin

Comment No.	Response
AR-1	<p>The commenter states they have previously voiced their concerns regarding 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, a response is not required and no changes to the EIR were determined to be necessary in response to this comment.</p>
AR-2	<p>The commenter states expressed their personal stake in the project and discusses the importance of the park. As discussed in EIR Section 5.12, Recreation, implementation of the project would not impede public access to Hancock Park and impacts to recreation would be less than significant. While the project would not expand or increase the amount of area dedicated to existing passive recreational uses, it would include improvements to the existing recreational areas and outdoor open spaces through modification to the existing pedestrian pathways into a continuous paved pedestrian path linking the existing elements of the site, including the Central Green. The project would also add a children's play area, picnic areas, and other new passive recreational amenities, such as seating areas and viewing points.</p> <p>Further, it should be noted that the vast amount of parkland provided by the 13-acre Hancock Park would continue to serve as a park facility with implementation of the project. The proposed Master Plan seeks to retain and enhance most of the valuable open space and passive park orientation of the site. Additionally, the County will be recommending approval of Refined Alternative 3 of the Master Plan. This variation adjusts the footprint of the project to reduce the new museum building's contact with the Page Museum and will expand the size of the Central Green. See <b>MR-1, Preferred Alternative</b>, for further information regarding the County's preferred alternative. No changes to the EIR were determined to be necessary in response to this comment.</p>
AR-3	<p>The commenter expresses concern regarding the proposed removal of existing trees on the project site and states that more or all the large shade trees should be saved.</p> <p>The County is prioritizing the protection of as many trees as possible while also meeting the budgetary and design needs for the project. However, many trees would not be able to be retained due to several issues related to feasibility of retention. These include the excavation requirements for construction of the new museum building and the relative proximity of the trees to the new building location, planned park accessibility improvements, and fire access requirements.</p> <p>The proposed removal of trees at the La Brea Tar Pits site is not considered a significant impact on the environment. The environmental analysis contained in EIR Section 5.3, Biological Resources, is an accurate assessment of the potential for significant environmental impacts regarding tree and vegetation removal. Furthermore, any visual impacts related to tree removal is appropriately discussed within EIR Section 5.1, Aesthetics. 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. Refer to <b>MR-2, Impacts to Native and Mature Trees</b>, for further information. No changes to the EIR were determined to be necessary in response to this comment.</p>
AR-4	<p>The commenter states that additional new trees should be incorporated into the project's design, with a focus on native species.</p> <p>As discussed above in response to comment AR-3, the proposed removal of trees at the La Brea Tar Pits site is not considered a significant impact on the environment. The environmental analysis regarding impacts to trees that is contained in the EIR is an accurate assessment of the potential for significant environmental impacts. Furthermore, it should be noted that native species are prioritized in the plant palette and have been incorporated into the project design where appropriate. The plant palette was developed based on the native vegetation of the Los Angeles Basin and was informed by research gathered from the La Brea Tar Pits fossil record. Refer to <b>MR-2, Impacts to Native and Mature Trees</b>, and <b>MR-3, Use of Native Plants and Vegetation</b>, for further information. No changes to the EIR were determined to be necessary in response to this comment.</p>

Comment No.	Response
AR-5	<p>The commenter requests that the amount of artificial lighting in the park should be minimized at night. The lighting of the park would not change demonstrably from existing conditions with implementation of the proposed project. Only warm-white toned LEDs would be incorporated into lighting regimes during the nighttime (between dawn and dusk). The park is currently lit for security and safety concerns. The park also closes at 10 pm. Lighting would continue to be provided for security and safety concerns. Light shields that limit the light flux only to required areas and thereby avoiding as much light trespass into potential transitory pathways.</p> <p>In addition to the consideration of lighting on the park grounds, through on-going management and operation of the property, the County will ensure that lighting from within is reduced to the extent feasible while retaining enough lighting for security and safety needs. This commitment is made for both existing and new facilities. The new museum building is not anticipated to be lit from within to any greater degree than the existing Page Museum. Lighting from within would be limited to dim security lighting, like the existing conditions at the Page Museum. As discussed in EIR Section 5.1, Aesthetics, implementation of Mitigation Measures AES/mm-4.1 and AES/mm-4.2 would reduce light-related impacts to less than significant. These measures would ensure that the project would not substantially worsen the existing lighting conditions of the site. No changes to the EIR were determined to be necessary in response to this comment.</p>
AR-6	<p>The commenter request that the park and existing buildings be redeveloped to prioritize the safety for birds. Refer to responses to comments LAA-4 through LAA-17. The following language has been added to Chapter 3, Project Description (added text shown in underline):</p> <p><u>"To significantly reduce birds from striking or colliding with the building, new construction would include deterrent features on glass barriers, windows, and building elements likely to present imperceptible barriers for avian species. These features would include ceramic frit patterns and/or other features that meet the criteria from the American Bird Conservancy for bird friendly glazing."</u></p> <p>The County will continue to refine the project designs to decrease the extent of glazing and the need for bird deterrence. As more detailed construction documents are developed, appropriate bird deterrence methods will be studied and incorporated further to prevent bird strikes resulting in mortality or injury.</p> <p>After receiving comments on the Draft EIR, the County considered the comments made by the commenting entities, including Audubon, and refined the design of the improvements proposed at the La Brea Tar Pits site. As a result, the County has proposed a variation of the Master Plan alternative. Refinements to the project will continue to be considered by the County as the design evolves. Refer to <b>MR-1, Preferred Alternative</b>, for more information regarding the additional information provided by the updated designs and Refined Alternative 3.</p>
AR-7	<p>The commenter expresses a concern that water runoff from the project would be diverted to City's storm water system rather than being retained on site for irrigation purposes.</p> <p>The County requires that all captured stormwater must be re-used within 96 hours to reduce the potential for vector control issues. Since the project will be landscaped with low-water use plants, it is anticipated that the demand required for reused water would not be met. EIR Section 5.9, Hydrology and Water Quality, and EIR Section 5.15, Utilities, include analyses with the assumption that water on the project site would not be recycled. The EIR concluded that the project would have less than significant impacts to hydrology and water quality as well as utility and service systems, with the implementation of identified mitigation measures. Refer to responses to comments TCRP-2, TCRP-3, and TCRP-4 for additional information regarding the project's bioswales and water use. No changes to the EIR were determined to be necessary in response to this comment.</p>

## 2.4.27 Lois DeArmond

From: **Lois DeArmond**  
Date: Fri, Oct 27, 2023 at 8:41 AM  
Subject: Tar Pits renovation  
To: <[Lnegritto@nhm.org](mailto:Lnegritto@nhm.org)>  
Cc: <[info@nhm.org](mailto:info@nhm.org)>

Dear Ms Negritto;

I am writing in concern for the proposed removal of up to 180 mature trees currently in the Hancock Park La Brea Tar Pits proposed re-configuration area.

I attended 2 public meetings at which three design firms presented their proposals. The firm chosen was, supposedly, the one proposing the least tree removal. I am now shocked and dismayed to learn that, as in every other development in Los Angeles, the trees have to go.

It should matter what we, the people who live here, want and need.

Thank you for your attention to this matter.

Sincerely yours,

Lois DeArmond,

Lifetime resident of Los Angeles

LDA-1

LDA-2

### 2.4.27.1 Response to Letter from Lois DeArmond

Comment No.	Response
LDA-1	<p>The commenter expresses concern regarding the proposed removal of existing trees on the project site. 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.</p> <p>The County is prioritizing the protection of as many trees as possible while also meeting the budgetary and design needs for the project. However, many trees would not be able to be retained due to several issues related to feasibility of retention. These include the excavation requirements for construction of the new museum building and the relative proximity of the trees to the new building location, planned park accessibility improvements, and fire access requirements.</p> <p>The proposed removal of trees at the La Brea Tar Pits site is not considered a significant impact on the environment. The environmental analysis contained in EIR Section 5.3, Biological Resources, is an accurate assessment of the potential for significant environmental impacts regarding tree and vegetation removal. Furthermore, any visual impacts related to tree removal is appropriately discussed within EIR Section 5.1, Aesthetics. 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. Refer to <b>MR-2, Impacts to Native and Mature Trees</b>, for further information. No changes to the EIR were determined to be necessary in response to this comment.</p>
LDA-2	<p>The commenter states that they attended a public meeting where it was discussed that the design firm selected for the project had proposed the least amount of tree removal of the potential firms.</p> <p>This is not a comment on the analysis contained in the EIR; therefore, a response is not necessary, and no changes to the EIR were determined to be necessary in response to this comment.</p>