
IV. RESPONSES TO COMMENTS

STATE AND REGIONAL AGENCIES

1. **State of California, Office of Planning and Research, State Clearinghouse**, Terry Roberts, Director, 1400 Tenth Street P.O. Box 3044, Sacramento, California 95812-3044, October 23, 2003.

2. **State of California, Office of Planning and Research, State Clearinghouse**, Terry Roberts, Director, 1400 Tenth Street P.O. Box 3044, Sacramento, California 95812-3044, October 24, 2003.
 - a) Enclosure 2a: State of California, Department of Toxic Substances Control, Harlan R. Jeche, Unit Chief, Southern California Cleanup Operations Branch – Glendale Office, 1011 N. Grandview Avenue, Glendale, California 91201, October 20, 2003. (See Comment Letter 4.)

3. **State of California, Office of Planning and Research, State Clearinghouse**, Terry Roberts, Director, 1400 Tenth Street P.O. Box 3044, Sacramento, California 95812-3044, October 30, 2003.
 - a) Enclosure 3a California Department of Transportation (Caltrans), Steven J. Buswell, IGR/CEQA Branch Chief, Transportation Planning Office, District 7, Regional Planning, 120 South Spring Street Los Angeles, California 90012, October 22, 2003. (See Comment Letter 5.)

4. **State of California, Department of Toxic Substances Control**, Harlan R. Jeche, Unit Chief, Southern California Cleanup Operations Branch – Glendale Office, 1011 N. Grandview Avenue, Glendale, California 91201, October 20, 2003.

5. **California Department of Transportation (Caltrans)**, Steven J. Buswell, IGR/CEQA Branch Chief, Transportation Planning Office, District 7, Regional Planning, 120 South Spring Street Los Angeles, California 90012, October 22, 2003.

6. **Southern California Association of Governments (SCAG)**, Jeffrey M. Smith, AICP, Senior Regional Planner, Intergovernmental Review, 818 West Seventh Street 12th Floor, Los Angeles, California 90017-3435, September 18, 2003.

7. **Los Angeles Unified School District (LAUSD)**, Raymond E. Dippel, Assistant Environmental Planning Specialist, 333 South Beaudry Avenue, 20th floor, Los Angeles, California 90017, October 13, 2003.

CITY OF LOS ANGELES AGENCIES & DEPARTMENTS

8. **City of Los Angeles, Department of Transportation (LADOT)**, Mike Bagheri, Transportation Engineer, 221 N. Figueroa St., Suite 200, Los Angeles, California 90012, October 22, 2003.

COMMUNITY GROUPS & ORGANIZATIONS

9. **Los Angeles County Museum of Natural History Foundation**, James R. Gilson, Vice President and General Counsel, 900 Exposition Boulevard, Los Angeles, California 90007, October 22, 2003.
10. **Los Angeles Conservancy**, Linda Dishman, Executive Director, 523 West Sixth Street, Suite 826, Los Angeles, California 90014, October 20, 2003.
11. **West Adams Heritage Association**, Jean Frost, Vice President; Chair, Historic Preservation Committee, c/o 2341 Scarff Street, Los Angeles, California 90007, October 22, 2003.

RESPONSES TO DRAFT EIR COMMENT LETTERS

COMMENT LETTER No. 1

State of California,

Governor's Office of Planning and Research, State Clearinghouse

Terry Roberts, Director

1400 Tenth Street P.O. Box 3044

Sacramento, California 95812-3044

October 23, 2003.

Comment No. 1.1

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on October 22, 2003, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Response No. 1.1

This comment acknowledges that the lead agency has complied with the State Clearinghouse review requirements in accordance with CEQA. (See Comment Letter Nos. 2 and 3 from the State Clearinghouse with enclosed agency letters from the Department of Toxic Substances Control and Caltrans after the close of the public review period. These agency letters were submitted directly to the lead agency prior to the close of the review period and are included herein as Comment Letter No. 4 (DTSC) and Comment Letter No. 5 (Caltrans).

COMMENT LETTER No. 2

State of California,

Governor's Office of Planning and Research, State Clearinghouse

Terry Roberts, Director

1400 Tenth Street P.O. Box 3044

Sacramento, California 95812-3044

October 24, 2003.

Comment No. 2.1

The enclosed comment (s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on October 22, 2003. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (1990011065) when contacting this office.

Enclosures

Response No. 2.1

The enclosed letter agency response letter from the Department of Toxic Substances Control (dated October 20, 2003) was submitted directly to the Coliseum Commission and was received prior to the close of the public review period. This letter is included herein as Comment Letter No. 4.

COMMENT LETTER No. 3

State of California,

Governor's Office of Planning and Research, State Clearinghouse

Terry Roberts, Director

1400 Tenth Street P.O. Box 3044

Sacramento, California 95812-3044

October 30, 2003.

Comment No. 3.1

The enclosed comment(s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on October 22, 2003. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (1990011065) when contacting this office.

Enclosures

Response No. 3.1

Comment noted. The enclosed letter agency response letter from Caltrans (dated October 22, 2003) is included herein as Comment Letter No. 4.

COMMENT LETTER No. 4**State of California,****Department of Toxic Substances Control**

Harlan R. Jeche, Unit Chief, Southern California Cleanup Operations Branch – Glendale Office
1011 N. Grandview Avenue
Glendale, California 91201
October 20, 2003.

Comment No. 4.1

The Department of Toxic Substances Control (DTSC) has received your Notice of Completion of draft Environmental Impact Report (EIR) for the project mentioned above.

Based on the review of the document, DTSC comments are as follows: If during construction of the project, soil contamination is suspected, construction in the area should stop, and appropriate health and safety procedures should be implemented. If it is determined that contaminated soils exist, the EIR should identify how any required investigation and/or remediation will be conducted, and which government agency will provide regulatory oversight.

DTSC provides guidance for Preliminary Endangerment Assessment preparation and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP please visit DTSC's web site at www.dtsc.ca.gov. If you would like to meet and discuss this matter further, please contact Mr. Alberto Valmidiano, Project Manager, at (818) 551-2870 or me, at (818) 551-2877.

Response No. 4.1

The lead agency appreciates DTSC's review and comment on the Draft EIR. Although it is unlikely to occur, the discovery of contaminated soils during the excavation and grading process was addressed in Section V.D Geology/Seismic Hazards, of the Draft EIR. Specifically, mitigation measure number 11 (page V.D-14) states:

“[p]rior to the issuance of building permits, if the soils and/or perched groundwater beneath the site are found to be contaminated, the City of Los Angeles Fire Department shall be notified and provided with a summary of all local, state, county, and federally required remediation activities and submit evidence of compliance.”

Should any contaminated soil materials be encountered or suspected during the construction process, the appropriate measures for soil remediation will be implemented in accordance with all applicable rules and regulations. The regulatory oversight agency for ensuring cleanup and remediation is the City of Los Angeles Fire Department. If contaminated groundwater is encountered or suspected, the Los Angeles Regional Water Quality Control District will be contacted as the regulatory agency responsible for monitoring groundwater within the L.A. Basin.

COMMENT LETTER No. 5

**California Department of Transportation
(Caltrans)**

Steven J. Buswell, IGR/CEQA Branch Chief, Transportation Planning Office,
District 7, Regional Planning
120 South Spring Street,
Los Angeles, California 90012
October 22, 2003.

Comment No. 5.1

Thank you for including the California Department of Transportation in the environmental review process for the above-mentioned project. Based on the information received, we have the following comments:

The project site is situated close to the heavily traveled I-110 (Harbor Freeway) and close to the congested I-10 (Santa Monica Freeway). Traffic mitigation should include coordination with other major events such as Staples Center events to avoid scheduling conflicts.

Response No. 5.1

As stated on page V.I.1-15 of the Draft EIR, it is expected that all attempts will be made to avoid scheduling conflicts between the Staples Center and the Los Angeles Memorial Coliseum. However, since the Staples Center and the other major venues in the Los Angeles area are not controlled by the Coliseum Commission, it is infeasible to ensure concurrent events do not occur. In light of this reality, concurrent events at the Staples Center and the Los Angeles Memorial Coliseum were considered within the Traffic Impact Analysis for the proposed project. The Traffic Impact Study utilized a conservative methodology to assume a worst-case scenario as part of the cumulative base traffic projections. These projections included adding traffic volumes from the Staples Center and the Los Angeles Convention Center to the existing volumes.

Comment No. 5.2

An additional traffic mitigation involves Event Traffic Management which includes coordination with the Caltrans Traffic Management Center (TMC). A Traffic Management Plan will be needed for road closures, detours and parking restrictions affecting access to State transportation facilities. Displaying traffic information on changeable message signs and adjusting ramp meters should be utilized during events especially if they conflict with commuter traffic.

Response No. 5.2

Implementation of a Traffic Management Plan is a required mitigation measure for the Proposed Project. The Traffic Management Plan will require collaboration between the Coliseum Commission, the Project Applicant or developer, and the LADOT, LAPD, Caltrans and the CHP. Displaying traffic information on changeable message signs and adjusting ramp meters were identified as measures that should be utilized as part of implementing the Traffic Management Plan.

Comment No. 5.3

We recommend that construction related truck trips on State highways be limited to off-peak commute periods. Transport of over-size or over-weight vehicles on State highways will need a Caltrans Transportation Permit.

If you have any questions regarding our response, refer to our internal IGR/CEQA Record # cs/030890, and please do not hesitate to contact me at (213) 897-4429.

Response No. 5.3

The Coliseum Commission requires all of its contractors to adhere to all applicable laws and regulations. As such, project contractors will be required to coordinate with Caltrans, as needed, for any oversized permits. Conditions to restrict haul truck trips outside of the peak-commute periods are usually imposed through the haul-route approval process, which is administered by the LADOT and Department of Building and Safety. Obtaining a haul route approval permit is required through mitigation measure V.D.8.

COMMENT LETTER No. 6

Southern California Association of Governments (SCAG)

Jeffrey M. Smith, AICP, Senior Regional Planner, Intergovernmental Review
818 West Seventh Street 12th Floor
Los Angeles, California 90017-3435
September 18, 2003.

Comment No. 6.1

Thank you for submitting the Los Angeles Memorial Coliseum Renovation Project for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the Los Angeles Memorial Coliseum Renovation Project, and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). Therefore, the proposed Project does not warrant comments at this time. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time.

A description of the proposed Project was published in SCAG's September 1-15, 2003 Intergovernmental Review Clearinghouse Report for public review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this Project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1867. Thank you.

Response No. 6.1

The Coliseum Commission appreciates SCAG's participation in the environmental review process. This comment is noted for the record and does not require a response.

COMMENT LETTER No. 7

Los Angeles Unified School District (LAUSD)

Raymond E. Dippel, Assistant Environmental Planning Specialist
333 South Beaudry Avenue, 20th floor
Los Angeles, California 90017
October 13, 2003.

Comment No. 7.1

The Los Angeles Unified School District (LAUSD) has reviewed the Notice of Completion of the Draft Environmental Impact Report (DEIR) for the Los Angeles Memorial Coliseum Renovation Project and submits the following comments on the scope and content of the DEIR. The LAUSD schools affected by the subject Project are Manual arts High School and Menlo Avenue Elementary School.

Response No. 7.1

Comment noted. Public schools, childcare and senior centers are typically identified as sensitive receptors for purposes of assessing a project impact on the surrounding environment. The Menlo Avenue Elementary School, located at 4156 Menlo Avenue, is approximately 1,848 feet (or 0.35 miles) south of the proposed project site. The Manual Arts High School, located at 4131 S. Vermont Avenue is approximately 1,320 feet (or 0.25 miles) south of the Project Site. Due to the respective distances of these school sites to the Coliseum, and due to the fact that there are other sensitive receptors located closer to the Coliseum which have been identified and which impacts have been quantified and analyzed, the two referenced LAUSD schools were not specifically identified as sensitive receptors in the EIR. While their presence is acknowledged, the EIR's findings of environmental impacts upon the other sensitive receptor sites located in closer proximity to the Coliseum indicate that these two schools would not experience any significant environmental impacts.

Comment No. 7.2

Impacts

Air Quality

Air quality is determined primarily by the type and amount of contaminants emitted into the atmosphere, the size and topography of the air basin, and its meteorological conditions. The South Coast Air Basin has low mixing heights and light winds which are conducive to the accumulation of air pollutants.

Air quality is measured by comparing contaminant levels in ambient air samples to national and state standards. These standards are set by the U.S. Environmental Protection Agency and the California Air Resources Board at levels determined to be protective of public health and welfare with an adequate margin of safety. National Ambient Air Quality Standards (NAAQS) were first authorized by the federal Clean Air Act of 1970. California Ambient Air Quality Standards (CAAQS) were authorized by the state legislature in 1967, these describe adverse conditions. Pollution levels must be below these standards before a Basin can attain the standard. The NAAQS describe acceptable conditions. Air quality is considered in "attainment" if pollutant levels are below or equal to the standards continuously and exceed them no more than once each year.

Response No. 7.2

The air quality analysis contained in the EIR included a comprehensive overview of both the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS). The general comments presented above do not include any specific comments or concerns associated with the adequacy or completeness of the Draft EIR. Therefore, no response is required.

Comment No. 7.3

Construction activities for the proposed project would result in short term impacts on ambient air quality in the area of Manual Arts High School and Menlo Avenue Elementary School. Students and school staff can be considered as possible sensitive receptors to the resultant air pollution.

To ensure that effective mitigation is applied to reduce construction air pollutant impacts on the Schools, we ask that air pollution impacts be quantified, and reduced to a level of insignificance.

Response No. 7.3

Air quality impacts of the proposed construction activities were quantified in the EIR and measured against the SCAQMD's significance criteria. As noted in Table V.B-5 of the EIR, the maximum daily construction emissions are anticipated to exceed the SCAQMD's significance threshold criteria for NO_x, CO, and PM₁₀. Daily construction emissions for ROG and So₂ would be below significance threshold criteria. The EIR identifies a number of required mitigation measures to help reduce the project's construction-related air quality impacts. However, significant air quality impacts for NO_x and CO criteria pollutants would remain significant. If the lead agency approves the proposed project in light of these significant and unavoidable short-term construction-related air quality impacts, a statement of overriding considerations will be required.

Comment No. 7.4Noise

Noise created by grading activity and construction activity may affect these schools. The construction activities include grading, earth moving, [sic] hauling, and use of heavy equipment. The California Environmental Quality Act requires that such impacts be quantified, and eliminated or reduced to a level of insignificance.

To ensure that effective mitigations are employed to reduce construction related noise impacts on District sites, we ask that the following language be included in the mitigation measures for noise.

If the proposed mitigation measures do not reduce noise impacts to a level of insignificance, the project applicant shall develop new and appropriate measures to effectively mitigate construction related noise at the affected schools. Provisions shall be made to allow the school and or designated representative(s) to notify the project applicant when such measures are warranted.

LAUSD established maximum allowable noise levels to protect students and staff from noise impacts generated in terms of L_{eq} . These standards were established based on regulations set forth by the California Department of Transportation and the City of Los Angeles. LAUSD's exterior noise standard is 67 dBA L_{eq} and the interior noise standard is 52 dBA L_{eq} . A noise level increase of 3 dBA or more over ambient noise levels is considered significant for existing schools and would require mitigation to achieve levels within 2 dBA of pre-project ambient level [sic]

Response No. 7.4

Construction-related noise impacts are addressed in Section V.F, Noise, of the Draft EIR (See page V.F-10). The Draft EIR concluded that the sensitive land uses identified in and around Exposition Park, which are located farther than 500 feet from the construction site, would not experience significant noise impacts from on-site construction activities. As such, it can be concluded that the construction-related noise impacts of the project would be even further reduced at the two LAUSD school sites identified in this comment letter. The Manual Arts High School is approximately 1,320 feet (or 0.25 miles) south of the Project Site. The Menlo Avenue Elementary School is approximately 1,848 feet (or 0.35 miles) south of the proposed Project Site. Considering the distances of these school sites to the Coliseum, and the fact that these sites are separated from the Coliseum by several roadways and structures, the audibility of construction noise would be barely perceptible at best. Given that construction noise levels are estimated to be as high as 89 dBA at 50 feet from the noise source (DEIR, page V.F-11), noise levels at over 1,000 feet away would be below 71 dBA assuming a direct line-of-sight between the noise source and the receptor. With several buildings obstructing the line-of-sight between the source and the receptor, additional sound attenuation of up to 10 dBA could be expected

resulting in a noise level of 61 dBA. This is below the ambient noise levels recorded in the project vicinity. As such the two identified LAUSD sites would not be adversely affected by the project's construction noise.

In terms of operational noise impacts, Coliseum events are typically scheduled during weekends and less frequently on weekday evenings. Coliseum events do not coincide with typical school hours. Thus, it is not expected that the any nearby schools would be affected by event-related noise.

Comment No. 7.5

School Traffic and Pedestrian Routes

Construction activity impacts schools, and will undoubtedly require mitigation measures. The District requests that the following mitigation measures applicable to this project, be considered.

- LAUSD Transportation Branch, (323) 342-1400, must be contacted regarding the potential impact, if any upon existing school bus routes
- Contractors must guarantee that safe and convenient pedestrian routes to school are maintained. Pedestrian route maps to LAUSD schools will be provided upon request.
- Contractors must maintain ongoing communication with administrators at impacted school sites providing sufficient notice to forewarn children and parents when currently existing pedestrian routes to schools are impacted.
- Install appropriate traffic controls (signs and signals) as needed to ensure pedestrian and vehicular safety.
- Sequence haul route and construction schedules to minimize school day conflicts with pedestrians, school buses and cars at arrival and dismissal times.
- Fund crossing guards for safety of students, as needed, during construction activities at impacted crossings.
- Fund a flag person, on an as needed basis, where construction related activities compromise safety of pedestrians and motorists while traveling to and from school.
- Construct barriers to minimize trespassing, vandalism, and short cut attraction, including security construction equipment,

Response No. 7.5

Comment noted. The Draft EIR provided a number of mitigation measures that address the construction-related impacts on the surrounding community, with specific regard to protect sensitive

receptor sites. The Draft EIR includes mitigation measures that require the project contractor to obtain haul route approval through the City of Los Angeles Department of Building and Safety. See Mitigation Measure No. 1 on page V.B-15 (Air Quality), Mitigation Measure No. 8 on page V.D-14 (Geology/Seismic Hazards) and Mitigation Measure No 2 on page V.F-16 (Noise). Specifically, these mitigation measures require haul routes to be established, where possible, through non-residential areas so as to minimize the effects of noise, and shall maximize, where possible, the distance traveled on major arterials. They also require the project contractor to establish a construction-related traffic plan detailing proposed haul routes and staging areas with specific consideration to protect sensitive land uses and residential neighborhoods. Additionally, Mitigation Measure No. 5 on page V.F-16 requires the project contractor to enclose the perimeter of the construction site with a temporary barrier wall for security and noise protection purposes. Perimeter fencing will also serve to prevent individuals from trespassing on the construction site, which will further ensure a safe pedestrian environment for schoolchildren. Mitigation Measure No. 2 on page V.B-15 requires diesel-powered equipment to be located as far away from sensitive land uses and areas as possible. To ensure the LAUSD is consulted during the construction plan review process, the following mitigation measure will be included within the Mitigation Monitoring and Reporting Program:

1. During the construction plan and haul route approval process, the project contractor shall consult with the LAUSD Transportation Branch (tel: (323) 342-1400), to address potential impacts upon existing pedestrian and school bus routes. Contractors must guarantee that safe and convenient pedestrian routes to school are maintained. The project contractor shall install appropriate traffic controls (signs and signals) as needed to ensure pedestrian and vehicular safety. The project contractor shall fund crossing guards for safety of students, as needed, during construction activities at impacted crossings.

Comment No. 7.6

The District's charge is to protect the health and safety of students and staff, and the integrity of the learning environment. The District also requires issues affecting schools be resolved prior to project approval, followed by enforceable mitigation measures, established to offset negative school impacts.

Response No. 7.5

This comment is noted for the record and will be forwarded to the decision-makers for their consideration.

COMMENT LETTER No. 8

City of Los Angeles

Department of Transportation (LADOT)

Mike Bagheri, Transportation Engineer

221 N. Figueroa St., Suite 200

Los Angeles, California 90012

October 22, 2003.

Comment No. 8.1

The Los Angeles Department of Transportation (LADOT) has reviewed the DEIR for the Los Angeles Memorial Coliseum Renovation Project, dated September 5, 2003, prepared by Christopher A. Joseph & Associates, and the supporting traffic study, prepared by traffic consultant, Kaku Associates. The project is located at the site of the existing Los Angeles Memorial Coliseum within the 27.4 acre Exposition Park which occupies the area bounded by Exposition Boulevard on the north, Figueroa Street on the east, Martin Luther King Jr. Boulevard on the south, and Vermont Avenue on the west.

Response No. 8.1

This comment does not raise any questions or concerns with respect to the adequacy or completeness of the analysis presented in the Draft EIR. Therefore, no response is required.

Comment No. 8.2

The traffic study analyzed 26 intersections for an event during the weekday PM peak hour and an event during a weekend. The study found that 23 intersections would be significantly impacted during a weekday event and 8 intersections would be significantly impacted during a weekend event. The DEIR fails to adequately evaluate the project's anticipated traffic impacts on the surrounding community because it did not explore available physical mitigations.

Response No. 8.2

The LADOT's assertion that the DEIR is inadequate because it did not explore available physical mitigations is unfounded. As noted in LADOT's response to the Lead Agency's Notice of Preparation (NOP) dated June 20, 2003, (see Appendix A of the Draft EIR) the LADOT acknowledged their department was coordinating with KAKU Associates, the project traffic consultant. The work scope discussed with Allyn Rifkin of LADOT in April, 2003, stated:

“Potential mitigations will be primarily directed at operational measures rather than those that require permanent physical/capital improvements. Each potential mitigation measure will be examined to determine their feasibility and effectiveness, and a recommended plan will be developed.”

Recognizing that operational measures would dominate the mitigations, Mr. Rifkin asked LADOT’s Special Traffic Operations staff to meet with the Kaku Associates team and explain the “Exposition Park Flexible Traffic Management Plan,” a 50-page set of maps and procedures. LADOT staff suggested that the EIR base operational mitigation measures on this five-level response plan, which is used for all special events in the vicinity of the Coliseum, Exposition Park, USC and the Shrine Auditorium. They provided a copy of the plan. The staff went into detail about the issues and concerns that arise in managing traffic for special events and their desire for permanent changeable message signs streetside on approaches to Exposition Park. These requests have been incorporated into the mitigation measures in the DEIR.

The rationale for not evaluating physical traffic improvements is based in part on the fact that the Coliseum is an existing use and the project would result in a reduction of total vehicle trips for any single event as compared to the current conditions. While it is acknowledged that the project will increase the number of events by approximately 10 to 12 games per year, it should be noted that NFL events occur on the weekends and weekday NFL events are likely to occur only once each season and would not occur during each and every season. In addition, weekend NFL events occur on Sundays and would have generally limited traffic impacts occurring during a one-hour period of time preceding an event and one-hour following an event. As such, and as stated in the Draft EIR, costly physical mitigation measures would not be justified outside of the game day scenarios. Accordingly, implementation of an event traffic management plan was the preferred approach to mitigating the project’s traffic impacts.

Comment No. 8.3

DISCUSSION AND FINDINGS

Project Description

The proposed project is to renovate the existing Memorial Coliseum stadium in Los Angeles and rehabilitate portions of the 27.4 acre project site. The proposed renovations would reduce the existing seating capacity from 92,500 to approximately 68,000 for National Football League games and to approximately 78,000 for collegiate football games. In addition, the project will construct 175 new luxury suites and a club level with 15,000 premier seats. No additional parking spaces are proposed in conjunction with the renovation project.

Response No. 8.3

This comment incorrectly restates the project description as presented in the NOP, and does not reflect any of the refinements that were fully disclosed in the project description of the Draft EIR. The Proposed Project includes reducing the existing seating capacity of the Coliseum from 92,500 seats to approximately 78,000 seats. In addition, the project will include the construction of 200 new luxury suites and two approximate 20,000-square-foot structures outside the stadium for ancillary or retail use. (See pages II-1 and III.C-1 of the Draft EIR.)

Comment No. 8.4**Trip Generation**

The project is expected to generate approximately 27,444 trips at sell-out capacity after discounting for transit use and accounting for a vehicle occupancy rate of 2.7 persons per vehicle. This translates into approximately 13,722 inbound PM peak hour trips for the pre event arrival.

Response No. 8.4

This comment restates the trip generation rates as presented in the Draft EIR. No response is required.

Comment No. 8.5**Significant Traffic Impact Locations**

The proposed project will have a significant impact at the following intersections:

Weekend Event

1. Adams Boulevard and Figueroa Street
2. I-110 N/B Ramps/Hill Street and Martin Luther King Jr. Boulevard
3. Jefferson Boulevard and Vermont Avenue
4. Jefferson Boulevard and Normandie Avenue
5. Adams Boulevard and Vermont Avenue
6. Adams Boulevard and Normandie Avenue
7. I-10 E/B Ramps and Normandie Avenue
8. I-10 W/B Ramps and Vermont Avenue

Weekday Event (PM Peak Hour)

1. Adams Boulevard and Figueroa Street

2. Figueroa Street and Jefferson Boulevard
3. Exposition Boulevard and Flower Street
4. 37th Street, Exposition Boulevard and Figueroa Street
5. 38th Place/Flower Street and Figueroa Street
6. 39th Street and I-110 HOV Ramps
7. 39th Street/Coliseum Drive and Figueroa Street
8. I-110 N/B Ramps/Hill Street and Martin Luther King Jr. Boulevard
9. Figueroa Street and Martin Luther King Jr. Boulevard
10. Hoover Street and Martin Luther King Jr. Boulevard
11. Martin Luther King Jr. Boulevard and Hoover Street
12. 39th Street and Vermont Avenue
13. Exposition Boulevard and Vermont Avenue
14. Martin Luther King Jr. Boulevard and Normandie Avenue
15. Exposition Boulevard and Normandie Avenue
16. Jefferson Boulevard and Vermont Avenue
17. Jefferson Boulevard and Normandie Avenue
18. Adams Boulevard and Vermont Avenue
19. Adams Boulevard and Normandie Avenue
20. I-10 E/B Ramps and Vermont Avenue
21. I-10 E/B Ramps and Normandie Avenue
22. I-10 W/B Ramps and Vermont Avenue
23. I-10 W/B Ramps and Normandie Avenue

Response No. 8.5

Part one of this comment only acknowledges the 8 intersections that were identified as being significantly impacted during the weekend *pre-event* scenario. However, this comment does not acknowledge the Draft EIR's findings for the weekend *post-event* scenario, which was previously requested by the LADOT. The findings for the weekend *post-event* scenario can be found on page V.I.1-29 of the Draft EIR.

With respect to the list of intersections identified under the Weekday Event (PM Peak Hour) subheading above, it appears the commenter inadvertently included the intersection of Hoover Street and Martin Luther King Boulevard twice under numbers 10 and 11 and failed to list the intersection of Martin Luther King Jr. Blvd. and Vermont Avenue.

Comment No. 8.6**PROJECT REQUIREMENTS****A. Incident Traffic Management Plan**

The proposed mitigation measure to implement a coordinated incident traffic management plan between the developer, the Los Angeles Police Department (LAPD), the California Department of Transportation (Caltrans), the California Highway Patrol, and LADOT is supported by LADOT. However, there are physical improvements for the impacted intersections that were not explored in the DEIR.

Response No. 8.6

As stated in response to comment 8.1, above, the work scope discussed with consultation with Kaku Associates, the project traffic engineer, and Allyn Rifkin of the LADOT in April, 2003, stated:

“Potential mitigations will be primarily directed at operational measures rather than those that require permanent physical/capital improvements. Each potential mitigation measure will be examined to determine their feasibility and effectiveness, and a recommended plan will be developed.”

Recognizing that operational measures would dominate the mitigations, Mr. Rifkin asked LADOT’s Special Traffic Operations staff to meet with the Kaku Associates team and explain the “Exposition Park Flexible Traffic Management Plan,” a 50-page set of maps and procedures. LADOT staff suggested that the EIR base operational mitigation measures on this five-level response plan, which is used for all special events in the vicinity of the Coliseum, Exposition Park, USC and the Shrine Auditorium. They provided a copy of the plan. The staff went into detail about the issues and concerns that arise in managing traffic for special events and their desire for permanent changeable message signs streetside on approaches to Exposition Park. These requests have been incorporated into the mitigation measures in the DEIR.

Although LADOT asserts the Draft EIR is shortsighted for not exploring available physical mitigation improvements, the LADOT did not identify or recommend any potential physical improvements that would effectively mitigate the project’s traffic impacts. With respect to the lead agency’s rationale for not evaluating physical mitigation measures, please refer to Response No 8.2.

Comment No. 8.7

B. Construction Impacts

LADOT recommends that a Traffic Construction Management plan be submitted to LADOT for review and approval prior to the start of any construction work. The plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties.

Response No. 8.7

As indicated in Section V.G, Geology/Seismic Hazards, of the Draft EIR, the project contractor will need to procure haul-route approval from the applicable City of Los Angeles departments. The traffic construction management plan will be submitted to the LADOT for review and approval prior to commencement of construction activities.

Comment No. 8.8

C. Highway Dedication and Street Widening Requirements

Figueroa Street is classified as a Major Highway Class II which requires a 40-foot half width roadway on a 52-foot half width right-of-way.

Vermont Avenue is also classified as a Major Highway Class II.

Martin Luther King Jr. Boulevard is also classified as a Major Highway Class II.

Exposition Boulevard is classified as a Secondary Highway which requires a 35-foot half-width roadway on a 45-foot right-of-way.

Hoover Street is also classified as a Secondary Highway.

Menlo Avenue is classified as a Local Street which requires a 20-foot half width roadway on a 30-foot half width right-of-way.

It appears that highway dedication may be required for streets fronting the proposed project. The developer should check with the Bureau of Engineering's (BOE) Land Development group to determine the highway dedication, street widening and sidewalk requirements for the project.

Response No. 8.8

Highway dedication and street widening improvements are not feasible to implement as the Coliseum Commission does not own any of the properties that abut the identified roadways. The property that the Coliseum is located on is owned by the State of California and includes a 27.4-acre parcel of land that is entirely land-locked by other State-owned parcels within Exposition Park. The property is leased to the Coliseum Commission. As such, implementing the highway dedication and street widenings as requested by the LADOT is outside the control of the Coliseum Commission.

Comment No. 8.9**D. Parking Analysis**

The proposed renovation project does not provide any new parking spaces. The DEIR indicates that there are 19,820 spaces available within the surrounding area including parking at various lots on the University of Southern California (USC) campus. A subterranean parking structure serving the California Science Center is currently under construction and will provide approximately 2,160 additional parking spaces during an event. To avoid substantial parking shortfalls during a major event, a condition of approval should be set that there will be no concurrent events at the Coliseum and at USC. Finally, the developer should check with the Department of Building and Safety on the number of Code required parking spaces needed for the project.

Response No. 8.9

The commentor is correct in restating that the Proposed Project does not include any new parking spaces. The Coliseum is an existing use and historic landmark that was originally constructed in 1923. The commercial parking requirements established in the City of Los Angeles Municipal Code do not provide any specific requirements to address renovation projects that retain the same use. The Coliseum has an existing seating capacity of 92,500 seats and is served by approximately 19,820 parking spaces. The Proposed Project reduces the seating capacity of the Coliseum to approximately 78,000 seats and will be served by an additional 2,160 parking spaces that are currently under construction in Exposition Park.

After the close of the public review period, the Coliseum Commission received notice from USC of their plans for constructing two new parking facilities that will be made available for future USC and NFL events at the Coliseum. The addition of these parking facilities will further reduce the Project's parking impact as stated in the EIR. The first facility will include 1,100-space parking structure on 37th Street between Figueroa Street and Flower Street. Construction for this new facility is expected to begin in December of this year for completion in approximately 13 months and prior to the completion of the Coliseum Renovation Project. The second facility includes a 1,200-space parking

structure located directly behind the Radisson Hotel on Flower Street at Exposition Boulevard. It is anticipated to be completed in late 2005. Together, these facilities will add approximately 2,300 additional parking spaces to the available inventory of parking spaces near the Coliseum. No changes are needed to amend the EIR as these additional off-site spaces would only serve to further increase the inventory of available parking for Coliseum events.

Comment No. 8.10

E. Driveway Access

This correspondence does not constitute approval of the driveways and circulation scheme for the project. Those require separate review and approval and should be coordinated with LADOT's Citywide Planning Coordination Section (201 N. Figueroa Street, 4th Floor, Station 25) as soon as possible to avoid delays in the building permit approval process.

DOT looks forward to working with the developer to find comprehensive transportation solutions to balance Citywide circulation needs with the need for holding sporting events at the Coliseum. If you have any questions, please contact Wes Pringle of my staff at (213) 580-5206.

Response No. 8.10

Comment noted. The Project does not propose any physical changes to the existing driveways or access lanes within Exposition Park. The project developer will coordinate with the LADOT, as needed during the building permit approval process.

COMMENT LETTER No. 9

Los Angeles County Museum of Natural History Foundation

James R. Gilson, Vice President and General Counsel

900 Exposition Boulevard

Los Angeles, California 90007

October 22, 2003.

Comment No. 9.1

Thank you for the opportunity to review and comment on the Draft EIR for this important project. I am writing on behalf of the Los Angeles County Museum of Natural History Foundation, which supports the operations of the Natural History Museum.

As you know, the Natural History Museum of Los Angeles County has been an important contributor to the success of Exposition Park and an important neighborhood, regional, and national cultural resource since its founding in 1910. Its educational, exhibit, and research programs draw a diverse audience that has increased over fifty percent in the last two years and is anticipated to reach approximately one million annually in the next decade. Currently and into the foreseeable future nearly all these visitors will arrive by private automobile or school bus.

Response No. 9.1

The Coliseum appreciates the Natural History Museum Foundation's participation in the environmental review process. This comment does not raise any concerns or questions with respect to the adequacy and completeness of the Draft EIR. Therefore, no response is required.

Comment No. 9.2

Our success combines with that of the other cultural, educational, and recreational sites in and around Exposition Park - including the success of the Coliseum and Sports Arena to make this area one of the more popular in the region. This popularity, however, results in inadequate access and parking even today on those days when the Coliseum fulfills its own important mission by hosting large events. Museum visitors and visitors to the other venues in the park regularly find it difficult to reach their destinations on days when the Coliseum hosts major events, then find it difficult or impossible to park during times that are within several hours of the events' schedules.

Response No. 9.2

Comment noted. The Draft EIR provides a full account of the parking and access conditions in and around Exposition Park during Coliseum events. This comment does not raise any concerns or questions pertaining to the adequacy and completeness of the Draft EIR. Therefore, no response is required.

Comment No. 9.3

The Draft EIR notes that the largest possible event in the Coliseum will attract fewer people after the proposed project than can be accommodated in the current configuration. However, the Draft EIR also projects that if the project is built the number of major Coliseum events per year actually will increase by approximately thirty-five percent and that average attendance per major Coliseum events also actually will increase (see pages IV.B-3 and IV.B-4). Currently, with fewer and lesser-attended major events at the Coliseum than are anticipated after the project's completion, museum visitors must mix with the Coliseum traffic flow to seek out parking lots (or ad hoc lawn parking) that may be distant or already full. Today's negative impact on access and parking for museum visitors inevitably will worsen with more events that draw more people to the Coliseum. Despite the acknowledged "increase in the intensity of the Coliseum's current use" (see page IV.B-4), the Draft EIR assumes and recommends "[n]o major alterations to the existing parking arrangement(s)" (see page III.C-27). Nor is the anticipated new Science Center parking structure (located across the park from our venue) adequate to accommodate the shortfall in parking for major Coliseum events even at the present attendance level.

Response No. 9.3

Correct. While the Proposed Project will reduce the seating capacity of the Coliseum by approximately 14,500 seats, which will in turn reduce the existing demand for parking during any one Coliseum event, the annual number of events to be scheduled at the Coliseum is anticipated to increase. The Draft EIR does not make any claims that the Science Center parking structure currently under construction will be adequate to accommodate the shortfall for major events at the Coliseum. In fact, the Draft EIR acknowledges that even with the added availability of 2,160 parking spaces from the Science Center structure, the percentage of demand satisfied by the existing inventory is estimated at 87%, with the remaining demand being satisfied in the surrounding neighborhoods (see Draft EIR, page V.I.2-4). However, since this represents a net improvement of 15% over current conditions, the parking impacts were concluded to be less than significant. In addition, as stated in Response No. 8.9, an additional 2,300 parking spaces are planned to be built by USC in the near future which will further increase the amount available parking spaces available for Coliseum patrons. While the addition of these spaces will further increase the amount of parking in the area, no changes to the EIR are required because the EIR did not rely on speculative future parking facilities to meet the parking demands for Coliseum events.

Comment No.9.4

The EIR must recognize the significant traffic and parking impacts on this museum and other park users caused by a project that increases both the number of major Coliseum events and the size of almost all of those events (all those other than the very largest events). Specifically, the EIR must include traffic and parking mitigation measures that go beyond generalized traffic management to focus on the reasonably foreseeable impacts. For instance, consideration must be given to requiring the following on major event days: specialized directional signs for non-Coliseum visitors; access lanes on streets around the park and within the park that are specifically held open for museum and other park visitors; and adequate parking (at a rate lower than event parking rates) that is specifically held open for museum and other park visitors. While elements of these measures are applied informally from time to time, not all have been put in place and those that have been put in place are purely voluntary measures that may be eliminated at any moment. Mandatory, permanent mitigation measures are appropriate in the context of the proposed project's permanent changes in Coliseum configuration and the anticipated related increase in Coliseum usage.

Response No. 9.4

Implementation of the Traffic Management Plan, which is a required mitigation measure, requires collaboration between the Project Applicant and various public agencies including the LADOT, LAPD, CHP and Caltrans. While participation in a Traffic Management Plan is required as a form of mitigation, the Coliseum Commission or the Project Developer are only held responsible for collaborating with the various agencies that have the authority to direct traffic on surrounding roadways and implement the traffic management plan. Providing mandatory and permanent mitigation measures to ensure dedicated traffic lanes and parking spaces are provided for Museum visitors is not feasible because the parking lots and accessway lanes to the parking lots within Exposition Park are owned and controlled by the State of California, not the Coliseum Commission. Attendance count reviews for the Natural History Museum indicate the reserve of parking inventory for museum visitors should always be adequate if directed by the State. The voluntary and informal measures and arrangements that have been effective during past events will continue to be implemented to ensure adequate access and parking is available to Museum patrons on event days.

In addition, as noted in the Draft EIR, the Traffic Management Plan will include flexible signage elements to implement turning lane restrictions and direct parking routes during special events. Flexible signage displays will be purchased by the Coliseum Commission as part of this Project. Currently flexible signage is used at strategic locations for special event traffic management. Mitigation in the form of adding permanent signage to direct Museum visitors is not feasible as it would have to be located on State property and would not be allowed pursuant to the Exposition Park Master Plan.

Comment No. 9.5

The Coliseum has no need to reduce its current or anticipated usage to account for the museum's activities and the bulk of Coliseum visitors are not impacted by museum events. However, the museum must reduce its activities whenever the Coliseum has a major event and the bulk of museum visitors are impacted by Coliseum events. Therefore, the responsibility for mitigation rests with the Coliseum as it becomes an even larger attraction.

Response No. 9.5

While patrons of the Museum of Natural History may experience traffic delays or may even avoid visiting the Museum on days when Coliseum events are held, the Museum is beneficially impacted from increased exposure and attendance of Coliseum patrons. Many individuals whom go to Exposition Park for the primary purpose of attending a Coliseum event, may also choose to visit the Museum before or after an event. In addition, many people who attend Coliseum events may become aware for the first time, or be reminded of the presence of the Museum's and other attractions in Exposition Park and may choose to re-visit those other uses at a later date. As such, it would be incorrect to assume that the Museum only suffers adverse impacts from Coliseum events. As it has done in the past, the Coliseum Commission will coordinate with the other stakeholders in Exposition Park to ensure event-related impacts are reduced to the maximum extent feasible.

The commentor has not provided any evidence to support the assertion that the museum must reduce its activities whenever the Coliseum has a major event. After reviewing attendance figures for the Natural History Museum on Saturdays over the past two years a discernable difference could not be found between days with Coliseum events and days without Coliseum events.

Comment No. 9.6

Our museum has happily and successfully shared Exposition Park with the Coliseum for many decades and hopes to do so well into the future. The proposed project - if it is as successful as all of us hope -- presents both the opportunity for and the need for improvements to traffic flow and parking so that we can continue to share the park successfully as we both grow. We look forward to working with you to cooperatively address those issues as the environmental review process continues.

Response No. 9.6

Comment noted. The Coliseum Commission looks forward to working with the Museum and all of the other stakeholders in Exposition Park to ensure continued success of the Coliseum and Exposition Park. This comment will be forwarded to the decision-makers for their consideration.

COMMENT LETTER No. 10

Los Angeles Conservancy

Linda Dishman, Executive Director
523 West Sixth Street, Suite 826
Los Angeles, California 90014
October 20, 2003.

Comment No. 10.1

I am writing to provide the comments of the Los Angeles Conservancy on the Draft Environmental Impact Report (DEIR) for the Los Angeles Memorial Coliseum Renovation Project. The Conservancy is pleased to offer its qualified support for the proposed project.

As you know, the Los Angeles Conservancy is now the nation's largest local historic preservation organization, with over 8,500 members. Formed in 1978 and celebrating our 25th anniversary this year, the Conservancy's mission is to preserve and enhance Los Angeles' historic buildings and neighborhoods.

The Conservancy has had a long history of involvement with the Coliseum, which is one of Los Angeles' few National Historic Landmarks, helping to save the stadium from potential demolition over a decade ago. The Conservancy later worked closely with the Coliseum's former managers on renovation plans for the Raiders in the early '90s and helped expedite FEMA funding for seismic upgrades to the Coliseum following the 1994 Northridge earthquake. When Los Angeles was considered for an NFL expansion franchise in 1999, the Conservancy worked with the competing ownership teams to help shape renovation plans for the Coliseum.

Response No. 10.1

The Coliseum appreciates the Conservancy's participation in the environmental review process. This comment does not raise any questions or concerns with respect to the adequacy or completeness of the analysis presented in the Draft EIR. Therefore, no response is required.

Comment No. 10.2

The Conservancy's policy is to support projects that meet the Secretary of Interior's Standards, the nationally accepted benchmark for evaluating alterations to historic structures; support for a project that does not meet the standards requires review and approval by the full Conservancy Board of Directors. As the Draft Environmental Impact Report has indicated, most elements of the proposed project do meet the standards, but the loss of the interior bowl shape, the removal of historic seating, and the

insertion of a new stadium within the historic one leave the overall project short of full compliance with the standards.

Response No. 10.2

Comment noted. This comment does not raise any questions or concerns with respect to the adequacy or completeness of the analysis presented in the Draft EIR. Therefore, no response is required.

Comment No. 10.3

In evaluating the project, the Conservancy's Board recognized the need, to enhance sight lines and the stadium's economic competitiveness. Our Board also appreciated the project team's efforts to minimize the scale of the new addition, and to leave portions of the historic seating intact and visible to retain the form and sense of a bowl. The Board noted that the scale and massing of the proposed addition is much more limited than the dramatic intrusions introduced at Chicago's historic Soldier Field (whose National Register eligibility actually has become imperiled). The proposal is also a welcome contrast to one of the 1999 proposals for the Coliseum, which introduced dramatic alterations to the exterior of the stadium, along with large and intrusive new parking structures within historic Exposition Park.

Response No. 10.3

Comment noted. This comment does not raise any questions or concerns with respect to the adequacy or completeness of the analysis presented in the Draft EIR. Therefore, no response is required.

Comment No. 10.4

The Conservancy fully supports and applauds the project's sensitive treatment of the Peristyle and the stadium's exterior form and walls. While the Conservancy is in overall support of the project, this support is qualified by continued concerns about the treatment of the interior. Today, upon emerging from the Coliseum's historic tunnels, one sees a breathtakingly beautiful historic venue, with cleanly elegant classical features that have remained intact for eight decades. The Board therefore expressed its hope that additional design collaboration and refinements can further minimize the intrusions of the new interior addition, further enhance the historic sense of a bowl shape, and further preserve and expose historic seating.

Response No. 10.4

It should be noted that the Draft EIR evaluates a conceptual design that falls within the parameters for historic preservation as identified in the Conceptual Historic Fabric Retention Plan (See Figure III-3 of the Draft EIR). While the project is conditioned to be developed in a manner that is consistent with the

Conceptual Historic Fabric Retention Plan, it should be understood that the architectural design is still a work in progress and is subject to refinement. As such, the opportunity for additional design collaboration and refinements to further minimize historic impacts can and will be pursued as part of the planning process.

Comment No. 10.5

While the Conservancy is pleased to offer its conditional support for the project in this manner, we do have three specific concerns about aspects of the analysis in the DEIR.

1) The Alternatives analysis in the Final EIR should contain a discussion of an alternative that meets the Secretary of the Interior's Standards.

Under CEQA, the Lead Agency has a responsibility to study a range of reasonable alternatives that would avoid or lessen project impacts. On a historic rehabilitation project, meeting the Secretary of Interior's Standards is the only way to ensure that an unavoidable significant adverse impact does not occur with regard to historic resources.

The Conservancy's conditional support for the project was based on recognition that it is difficult to reconcile the Secretary of Interior's Standards with the project objectives - in particular, the NFL's stringent programmatic requirements. We nonetheless make this suggestion both because we believe CEQA requires it, and because the exercise of reviewing the proposed project against an alternative that actually does meet the standards will further clarify the programmatic issues at stake and provide an impetus toward further, positive design refinements of the project.

Response No. 10.5

As stated in the Draft EIR, the Proposed Project's goals and objectives are centered on renovating the Coliseum in conformance with the generally accepted standards of design for NFL stadiums, thus enabling the Coliseum Commission to acquire and maintain an NFL franchise in the City of Los Angeles. As explained in further detail below, it is not physically possible to renovate the Coliseum in a manner that fully meets both the NFL's design standards ("NFL Standards") and the Secretary of Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Structures ("Historic Standards"). As such, meeting the Historic Standards would preclude meeting the NFL Standards and would thus result in the No Project Alternative. To demonstrate this point, the following analysis was provided in collaboration with Architectural Resources Group, the historic consultant for the EIR.

The following analysis identifies the historic defining characteristics of the Coliseum in italics and provides a discussion on how the project will or will not meet the Historic Standards.

Treatment of Historic Features

The Peristyle – Retained and enhanced as the major focus of the stadium. Adjacent nearby seating will also be preserved. The large existing, non-historic electronic display boxes that sit on top of the Peristyle will be removed, allowing the Peristyle to be seen in its historic form for the first time in many years. The offices and ticket areas adjacent to the Peristyle will also be retained.

Historic Standards: No changes to the design are required here to meet the standards.

NFL Standards: The NFL Standards are not compromised by the retention of the Peristyle.

Exterior Coliseum Form and Walls – The exterior walls and cantilevered seating at the rim of the Coliseum will be retained and highlighted. New seating that extends above the historic form will be stepped in away from the rim to enhance and differentiate it from the historic form below. Existing stairs and tunnels on the exterior walls will be retained and used wherever possible. It should be noted that the existing stairs do not meet code requirements. They will be retained to keep the historic fabric, but it is possible they will no longer be used.

Historic Standards: No changes to the design are required here to meet the standards.

NFL Standards: The NFL Standards are not compromised by the retention of the exterior Coliseum form and walls. However, retaining the exterior form and walls poses considerable constraints on designing the interior of the facility. As reflected in the current design, many of these constraints have been overcome through design modifications or have been accommodated by compromising an “ideal” stadium design.

Bowl Configuration – The important existing configuration of the Coliseum as a bowl will be retained.

Historic Standards: While the bowl form is retained, the current design does not permit the bowl configuration to be seen at all points from the interior. The only way to accomplish this would be to remove the suites and boxes proposed that cover over the bowl and to retain the upper level of seating now proposed to be removed (see below). In doing this the program for the project will be greatly compromised.

NFL Standards: The development and design of modern NFL stadiums are required to be competitive in all respects with professional football stadiums recently constructed or under construction. The NFL Standards require seating to be as close to the playing field as desirable, sightlines shall be optimum and viewing unobstructed by the structure. Retention of the existing bowl shape would result in seats that are farther from the playing field. The retention of the bowl shape results in fewer seats being located between the 40- and 50-yard

lines, which provide spectators with the best views of the football field. Retention of the bowl shape would also preclude the ability to design and construct luxury suites within the mid levels of the Coliseum. To retain the shape of the bowl and construct luxury suites, the suites would need to be placed above the rim of the stadium. This design would neither meet the Historic Standards nor the NFL Standards.

Field Level – *The field level was lowered 11 feet in 1994 from its historic level. The current project will retain the field at its current level. Also, due to the current configuration of the field, track and field events are now not possible. The proposed renovation will provide the Coliseum the opportunity to host track and field events in the future, though it will require the installation of a temporary, elevated event level.*

Historic Standards: No changes to the design are required here to meet the standards.

NFL Standards: The NFL Standards are not compromised by the retention of the field level.

Stairs – *Most of the existing berm stairs will be retained. Since the berm stairs do not meet code requirements, as noted above, it may not be possible to open these stairs for public use. The Commission and its design team will work with the Conservancy to determine the proper balance between retaining existing stairs and rebuilding stairs in place that will meet current codes. The two escalators on the outside of the exterior wall will be removed and the stairs in these areas will be returned to their original configurations.*

Historic Standards: No changes to the design are required here to meet the standards. While the stairs will remain in place they will not be used because of current code requirements.

NFL Standards: The NFL Standards are not compromised by the retention of the stairs.

Tunnels – *The historic vomitory tunnel entrances that lead into the bowl will be retained and reused. Most of the tunnels will be shortened and connect to the new at-grade Concourse. A few of the tunnels will be widened for emergency exiting.*

Historic Standards: No changes to the design are required here to meet the standards. While a few of the tunnels will be widened, the majority of the tunnels will retain their historic form and will provide visitors with an understanding of both the layout and functionality of the tunnels

NFL Standards: The NFL Standards are not compromised by the retention of the tunnels.

Lower Seating – *New portions of the lower seating will be placed over the concrete risers, preserving the stepped seating form in place while providing improved comfort and sight lines. The design of the new seating will integrate the form of the bowl and lower seating so that the old and new will be integral.*

Historic Standards: No changes to the design are required here to meet the standards. The existing historic concrete form of the lower seating will remain in place.

NFL Standards: The NFL Standards are not compromised by the retention of the lower seating areas as the new construction will be placed over the original fabric. The NFL Standards would be compromised however, if the historic fabric is required to be exposed and remain visible in order to meet the Historic Standards.

Upper Seating – *On the sidelines, between the Main Concourse, or Plaza Level, and the Club Level, the historic concrete treads and risers will be removed to accommodate the new Concourse and Suites. At the Upper Suites and Press Level, the seats will be retained and will be visible from the Club and Upper Suite Levels. These seats will not be visible from inside the new bowl. The last six levels of original seats at the rim will be exposed for the entire historic circumference of the Coliseum. At the sidelines, this part of the original bowl will be visible from the Upper Concourse and from the exterior of the building. The rim stops at the Peristyle. In the east and west end zones, large sections of the upper bowl will be retained and exposed.*

Historic Standards: In order to meet the standards here, the upper level seating needs to be retained and not covered over with the proposed suites, concourse and box seats.

NFL Standards: The retention of the upper seating areas would preclude the development of premiere seating and luxury suites. NFL Standards require a minimum of 108 private suites be provided at the club level. NFL Standards also require the ability to provide suites on two levels. Meeting the Historic standards would compromise the ability to meet the NFL Standards for luxury suites.

Concourse Level and Floor Elevations – *The existing Concourse level will be removed and a new Concourse constructed at the same level. Locations for new floor slabs will be directly related to the historic floor elevations. The primary historic columns and beams that are part of the 1931 addition will directly relate to new structural elements that are part of the expansion.*

Historic Standards: Modifications to the concourse level, together with the other modifications that are necessary to meet the NFL standards, further contribute to the cumulative effects of the design that may jeopardize the project's ability to meet all of the Secretary of Interior's Standards. Retention of the concourse in its current form would improve the Project's ability to

meet the Historic Standards, but would preclude the project's ability to meet the NFL Standards.

NFL Standards: If the concourse level is not created and all of the existing floor levels retained, as they exist now, many functional problems will result. Modifications to the concourse level are essential for supporting the structural design of the luxury suites and upper seating areas as enumerated above.

Lighting – *The four existing 1932 standing lamps flanking the arched entrances and the 1932 double light brackets along the upper rim of the Coliseum would be rehabilitated and reused. Existing modern floodlight towers at the north and south rims of the Coliseum will be removed.*

Historic Standards: No changes to the design are required here to meet the standards.

NFL Standards: Retention of the four historic lighting features would not compromise the NFL Standards. However, additional modern lighting fixtures are necessary to provide adequate field and filming light.

Landscaping - *Historic plantings surrounding the Coliseum will be retained and more recent plantings will be replanted with plant species that were used in the 1932 period.*

Historic Standards: No changes to the design are required here to meet the standards.

NFL Standards: Incorporating a landscape plan that is representative of the original design of the Coliseum would not compromise the NFL Standards.

Comment No. 10.6

2) Given that a significant adverse impact remains with respect to historic resources, the FEIR should contain additional, meaningful mitigation measures to minimize these impacts.

The DEIR's proposed mitigation measures in the historic resources section are rather skimpy. The Conservancy has been pleased that the project will result in the exterior restoration of the stadium and other enhancements to the venue's historic fabric. While such project elements are included in the overall project description, we would suggest that the project's benefits with regard to historic resources be more clearly enumerated in the historic resource mitigation section.

To ensure proper treatment of the historic elements to be preserved, we would suggest as an additional mitigation measure a monitoring plan to be overseen by a qualified historic preservation consultant. In addition, since the Coliseum remains in the hands of a public joint powers entity and is subject to the

vagaries of its City, County and State leadership over time, the Conservancy would ask that up-front assurances be given in the Final EIR that proper maintenance of the historic resource will occur in the future. Because such maintenance would become more feasible as additional revenue gets generated from NFL events and other functions attracted by the site improvements, the DEIR should specify as an additional mitigation measure a capital investment and maintenance program for the Coliseum.

Response No. 10.6

In addition to a monitoring plan that is overseen by a qualified historic preservation professional, several other mitigation measures might be considered. They include photographically recording the project before and during construction to HABS Photographic Standards with particular attention being given to character-defining elements that are to be removed or destroyed. Exhibits that describe the history and changes to the Coliseum over time might also be developed and placed in the Coliseum.

As provided in the Mitigation Monitoring and Reporting Program, Cultural and Historic Resources Mitigation Measure No. 2 (see also Draft EIR, page V.C-30), maintenance of the Coliseum in a manner that is consistent with the Secretary of Interior's Standards is a requirement of the Project that will continue throughout the life of the Project. The Coliseum Commission oversees all aspects of the operation of the Coliseum and is the public agency responsible for ensuring compliance with this measure. See Section IV, Mitigation Monitoring and Reporting Program).

Comment No. 10.7

3) The FEIR would benefit from a more refined analysis of the stadium's post-project historic eligibility.

While the Conservancy agrees with the DEIR's basic conclusion that the Coliseum's eligibility for National Register and National Historic Landmark status will remain, the DEIR's analysis is perhaps overly sanguine. National Historic Landmark status requires that a property have a "high degree of integrity." It is an over-statement to maintain that delisting would require "removing all of the character-defining features or demolition due to fire or other event." The Conservancy believes, for example, that Soldier Field in Chicago, which has neither been demolished or had its character-defining features fully removed, may nonetheless have been altered to such an extent that delisting is warranted. We also believe that previous proposals for the Coliseum, such as the changes proposed by Michael Ovitz in 1999, may well have resulted in potential delisting.

Response No. 10.7

The analysis presented in the EIR is based on the post-project conditions.

Comment No. 10.8

The Conservancy's position on the project's eligibility is more complex: the proposed project does have some impact on the historic resource, and it is conceivable that it could threaten the Coliseum's eligibility. But because this proposal retains the majority of the character-defining features of the stadium as either intact or intact and visible, the Conservancy believes that the site's eligibility is not jeopardized.

Response No. 10.8

This comment is noted for the record and will be forwarded to the decision-makers for their consideration.

Comment No. 10.9

Notwithstanding these comments, which are made in the spirit of further improving an already positive project, the Conservancy wishes to commend the Coliseum Commission and its project team for approaching the project's crucial historic preservation issues with sensitivity and creativity. We believe that this project can fully achieve its potential to create a sensitive and exciting blend of a state-of-the-art NFL stadium with a visibly historic athletic venue of the past century.

We look forward to a continued productive relationship as this process moves forward.

Response No. 10.9

This comment is noted for the record and will be forwarded to the decision-makers for their consideration.

COMMENT LETTER No. 11

West Adams Heritage Association

Jean Frost, Vice President; Chair, Historic Preservation Committee
c/o 2341 Scarff Street
Los Angeles, California 90007
October 22, 2003.

Comment No. 11.1

On behalf of the West Adams Heritage Association, one of the largest community based preservation organizations in Los Angeles, I would like to thank you for your invitation to review plans for the L.A. Coliseum renovation and the DEIR. Mr. Lynch and Ms. Farnum were extremely helpful in understanding the plans and the reasons for certain modifications to the landmark site. The courtesy extended to WAHA, Mr. Bronson and myself is appreciated.

Response No. 11.1

The Coliseum appreciates WAHA's participation in the environmental review process. This comment does not raise any questions or concerns with respect to the adequacy or completeness of the analysis presented in the Draft EIR. Therefore, no response is required.

Comment No. 11.2

WAHA consists of over 350 households primarily in South Los Angeles dedicated to the preservation of the city's architecture and culture. The Coliseum and Exposition Park is of primary importance to WAHA's commitment to historic resources. WAHA has a history of reviewing plans for other sites in Exposition Park, including the design of the Armory School currently under construction. We are neighbors and care very deeply about how our park resources are maintained and improved.

Response No. 11.2

This comment does not raise any concerns or questions pertaining to the adequacy and completeness of the Draft EIR. Therefore, no response is required.

Comment No. 11.3

There has obviously been great effort made to make the renovation in keeping with the Secretary of Interior's Standards for rehabilitation of historic properties. We are pleased that the current project meets those standards with the exception of the new seating and luxury boxes. We are pleased that

most of the character defining features are being retained, particularly all of the exterior wall, and the Peristyle. To the extent feasible, we ask that efforts be continued to retain as much of the historic fabric as possible. We also are sympathetic to the needs of the Coliseum to continue to function and provide viability long into the future.

Response No. 11.3

This comment infers that the proposed conceptual design meets all of the Secretary of Interior's Standards for the Rehabilitation of Historic Structures. This is not correct. The Draft EIR concludes that the proposed project meets all of the standards except for the removal of the seating at some locations. This is considered a significant impact that cannot be feasibly mitigated.

Comment No. 11.4

Given the cultural importance of the Coliseum, in addition to its architectural importance, it is our understanding this landmark building will continue to retain its landmark status and anchor and contribute to the eligible historic district within Exposition Park. We support the project's compliance with the Secretary of Interior's Standards, and are pleased that many of the choices being made improve the historic site such as removal of the scoreboards from atop the Peristyle Wall. We ask that efforts to retain historic fabric be continued; and that the new elements such as the roof overhang over the new seating be minimized as much as possible, that the Peristyle end not be covered by a plaza but rather left in its steps configuration. The existing renovation plans for a platform at the Peristyle end changes the visual impact and bowl like feeling. We also urge that a landscaping plan be included that returns the Coliseum to its period of significance, much as Christmas Tree Lane will provide a view into the parks history at a point in time.

Response No. 11.4

Comment noted. While the project is conditioned to be developed in a manner that is consistent with the Conceptual Historic Fabric Retention Plan, it should be understood that the architectural design is still a work in progress and is subject to refinement. As such, the opportunity for additional design collaboration and refinements to further minimize historic impacts can and will be pursued as part of the planning process.

Comment No. 11.5

West Adams Heritage will be pleased to continue to work with the Coliseum management on his very important Landmark to Exposition Park, West Adams and Los Angeles. Through continuing dialogue, we hope that refinements can further minimize the impacts of the new interior addition, further augment the historic sense of a bowl shape, and further preserve and retain historic seating. The proposed

renovation is far superior to many of the previously proposed scenarios for renovation. We are very appreciative of the care that is being taken at this time to retain most of the character defining elements. In the FEIR, we would ask that the current project benefits in terms of its continuing to contribute as a historic resource are further delineated and that parking be further analyzed.

Response No. 11.5

This comment is noted for the record and will be forwarded to the decision-makers for their consideration.