A. Introduction

The Sidewalk and Transit Amenities Program (STAP) Draft Initial Study/Mitigated Negative Declaration (IS/MND) was circulated for public review and comment by the City of Los Angeles (City) on October 14, 2021, initiating a 30-day public review period pursuant to the California Environmental Quality Act (CEQA) and its implementing guidelines. The Notice of Availability/Notice of Intent was prepared in English and Spanish, and it was distributed to relevant agencies, organizations, and interested parties. The Notice of Availability/Notice of Intent in English was also published in the *LA Times* on October 14, 2021, and *La Opinion* newspaper on October 7, 2021. The Draft IS/MND was available for review online at the Bureau of Street Services (StreetsLA) website at: https://streetsla.lacity.org/stap-program-fact-sheet and also on the Bureau of Engineering website at: https://eng.lacity.org/about-us/divisions/environmental-management/projects/stap. Additionally, the hard copy of the document was made available for review at the Bureau of Engineering, Environmental Management Group office at 1149 S. Broadway, Los Angeles, California 90015.

During this public review period, 126 comment letters were received, as shown in Table RTC-1. Each comment letter has been assigned a number code with the issues raised summarized to facilitate responses. Due to similar issues raised by most commenters, the response for each issue raised is prepared. Each commenter is guided to the response to his or her comments in Table RTC-1 as well. Comments that raise issues not directly related to the substance of the environmental analysis in the Draft IS/MND are noted but, in accordance with CEQA, did not receive a detailed response.

Subsequent to the public review period, seven comment letters were received regarding the Draft IS/MND. While CEQA does not require responses to comments to negative declarations (including MNDs) or to late comments, the City nevertheless has reviewed these late-submitted comments, and has concluded that they do not raise any new substantive issues that were not already responded to in the IS/MND response to comments. Copies of the late-submitted comment letters are included in Appendix 2 to this Response to Comments.

B. Summary of Comments Received and Comment Letters

The comment letters received on the Draft IS/MND are listed in Table RTC-1. A total of 101 individuals submitted comment letters with the same content, so they are grouped together and listed alphabetically, as shown in Table RTC-1. Comment letters No. 102 to 126 were submitted by individuals and organizations, and they are listed alphabetically in Table RTC-1. A copy of the comment letters in the order appearing in Table RTC-1 is provided after Table RTC-1. Finally, the responses by topic issues are provided following the comment letters.

Table RTC-1. Comment Letters received during Public Review Period

No.	Last Name, First Name	Date Submitted	Issue Raised	Responses
001	Aldredge, Emily	11/2/2021	 Driver distraction Visual impacts 	See Response Nos. 2.1 and 2.2 on driver
002	Angelini, Michelle	11/2/2021	 Power usage underestimated Full Traffic Study request Low estimate of negative 	distraction 2. See Response No. 1.1 on visual impacts
003	Antin, Judith	11/2/2021	public opinion	3. See Response No. 3.1 on
004	Bayliss, Hooshik	11/12/2021	Environmental Impact Report (EIR) preparation request	energy usage 4. See Response Nos. 2.2
005	Beale, Marjorie	11/2/2021		and 2.5 related to analysis on traffic hazards5. See Response No. 6.2 on
006	Billet, Monica	11/2/2021		public opinion
007	Bjelajac, Susan	11/11/2021		6. See Response No. 7.2 on EIR preparation
800	Boukidis, Constance	11/12/2021		
009	Charles, Diane	11/2/2021		
010	Craven, Jessica	11/11/2021		
011	Davis, Phil	11/12/2021		
012	Dehmel, Suzanne	11/9/2021		
013	East, Elizabeth	11/3/2021		
014	Ellis, Jeffrey	11/12/2021		
015	Fierro-Clarke, Alexander	11/2/2021		
016	Flink, Mason	11/2/2021		
017	Ganis, Glenda	11/2/2021		
018	Garfinkle, Davd	11/3/2021		
019	Garrison, Stuart	11/11/2021		
020	Gasser, Mark	11/3/2021		
021	Gibson, Marlyn	11/2/2021		
022	Goldin, Greg	11/2/2021		
023	Goldstone, Raymond	11/3/2021		
024	Gordon, Susan	11/11/2021		
025	Graff, Steve	11/11/2021		

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No.	Last Name, First Name	Date Submitted	Issue Raised	Responses
026	Graham, Stephen	11/11/2021		
027	Green, Karen	11/2/2021		
028	Gross, Michael	11/11/2021		
029	Grunbaum, Dorien	11/2/2021		
030	Holguin, Carla	11/2/2021		
031	Hong, Celeste	11/11/2021		
032	Ingalls, Tayfur	11/3/2021		
033	Jacoby, Jay	11/12/2021		
034	Kalin, Lisa	11/11/2021		
035	Kasdan, Batsheva	11/11/2021		
036	Kasdan, Sheldon	11/11/2021		
037	Keplinger, Julia	11/3/2021		
038	Kirsner, Robert	11/3/2021		
039	Kleiman, George	11/2/2021		
040	La Mattina, Tracy	11/2/2021		
041	Lesel, Helene	11/12/2021		
042	Lieberman, Richard	11/12/2021		
043	Livesey- Fassel, Elaine	11/2/2021		
044	Lopez, Ralph	11/2/2021		
045	Lorick, John	11/2/2021		
046	Maike, Both	11/9/2021		
047	Marlowe, Paul	11/11/2021		
048	Martinez, Brenda	11/2/2021		
049	May, Julie	11/2/2021		
050	McMullen, Gail	11/2/2021		
051	Meals, Susan	11/2/2021		

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No.	Last Name, First Name	Date Submitted	Issue Raised	Responses
052	Meyer, Anna	11/2/2021		
053	Monreal, Armida	11/3/2021		
054	Munguia, Janel	11/2/2021		
055	Nelson, Louise	11/11/2021		
056	Ness, Judy	11/2/2021		
057	Nicholas, Denise	11/11/2021		
058	Parks, Sally Rightor	11/2/2021		
059	Perea, Claudia	11/8/2021		
060	Prescott, Sierra	11/2/2021		
061	Pretsky, Joshua	11/2/2021		
062	Ragosine, Dorrit	11/11/2021		
063	Randall, Stephen	11/11/2021		
064	Regan, Barbara	11/11/2021		
065	Reichmann, Jan	11/11/2021		
066	Rich, Craig	11/12/2021		
067	Robinson, Anne	11/2/2021		
068	Ronk, Martha	11/3/2021		
069	Rosemark, Robin	11/12/2021		
070	Ryder, Derek	11/2/2021		
071	Saltsman, Richard	11/4/2021		
072	Seltzer, Rob	11/2/2021		
073	Shayne, Al	11/2/2021		
074	Silverman, Marc	11/2/2021		
075	Sneed, Christine	11/11/2021		
076	Sorgi, Chris	11/11/2021		

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No.	Last Name, First Name	Date Submitted	Issue Raised	Responses
077	Soucek, P.P.	11/3/2021		
078	Stein, Beth	11/11/2021		
079	Stern, Evelyn	11/2/2021		
080	Stone, Stephen	11/2/2021		
081	Tarr, Janice	11/11/2021		
082	Tegnazian, Terry	11/2/2021		
083	Timme, Mary	11/3/2021		
084	Triplett, Tia	11/2/2021		
085	Turner, Ellen	11/11/2021		
086	Valenzuela, Letty	11/11/2021		
087	Vatter, Sherry	11/2/2021		
088	Villasenor, Claudia	11/11/2021		
089	Vogel, Charles	11/2/2021		
090	Ward, Emma	11/3/2021		
091	Weakly, Deannamaria	11/9/2021		
092	Weiske, Lynne	11/2/2021		
093	West, Rob	11/12/2021		
094	Wilkinson, Dorothy	11/11/2021		
095	Williams, Donna	11/3/2021		
096	Winsberg, Susan	11/11/2021		
097	Wodinsky, Jessica	11/2/2021		
098	Yanowitz, Steviann	11/11/2021		
099	Young, Hilary	11/2/2021		
100	Youngelson, Noah	11/2/2021		
101	Zalman, Molly	11/2/2021		
102	Bitzer, Ron	11/11/2021	More public input Promote mobile phones to access lacity.org	See Response No. 7.4 on public review period

Table RTC-1. Comment Letters received during Public Review Period

No.	Last Name, First Name	Date Submitted	Issue Raised	Responses
			Transportation hazards from digital displays EIR preparation request	 See Response No. 7.22 on existing mobile phones and accessing lacity.org See Response 2.2 on driver distraction and traffic hazards from digital displays See Response No. 7.2 on EIR preparation
103	Coalition for a Scenic Los Angeles - Frank, Patrick	10/22/2021	Clarify energy usage	See Response No. 3.1 on energy usage
104	Coalition for a Scenic Los Angeles - Frank, Patrick	11/12/2021	 IS/MND inadequate EIR preparation request Driver distraction and traffic hazards Sign placement in right-ofway and LAMC 14.4.5 	 See Response No. 7.1 on IS/MND adequacy See Response No. 7.2 on EIR preparation See Response Nos. 2.1 and 2.2 on driver distraction and traffic hazards from digital displays See Response No. 2.5 on applicability of LAMC 14.4.5 to right-of-way and Response No. 5.3 on sign placement and zoning
105	Coastal San Pedro Neighborhood Council - Rudisill, Robin	11/8/2021	Extend public review period	See Response No. 7.4 on public review period
106	Emmerton, Elizabeth	11/5/2021	Supports STAP; does not wish EIR prepared	See Response No. 7.3 on Requests EIR not be prepared and letter of support
107	Endangered Habitats League - Silver, Dan	11/5/2021	 Driver distraction Visual impacts Low estimate of negative public opinion Power usage underestimated EIR preparation request 	 See Response Nos. 2.1 and 2.2 on driver distraction and traffic hazards from digital displays See Response No. 1.1 on visual impacts See Response No. 6.2 on public opinion See Response No. 3.1 on energy usage See Response No. 7.2 on EIR preparation
108	Farha, Philip	11/5/2021	Supports digital media; does not wish EIR prepared	See Response No. 7.3 on requests EIR not be prepared and letter of support

Table RTC-1. Comment Letters received during Public Review Period

No.	Last Name, First Name	Date Submitted	Issue Raised	Responses
109	Hollywood United Neighborhood Council – Van Dusen, Jim	11/10/2021	 EIR preparation request Driver distraction Visual impacts Power usage underestimated Ability to opt in/out of Program 	 See Response No. 7.2 on EIR preparation See Response Nos. 2.1 and 2.2 on driver distraction See Response No. 1.1 on visual impacts See Response No. 3.1 on energy usage See Response 7.23 on opting in/out of Program
110	Lincoln Heights Neighborhood Council - Arevalo, Gilbert	10/29/2021	Concerns for bench seats for seniors and shelter sizing	See Response Nos. 7.13, 7.14, and 7.15 concerning design, accessibility, street furniture, and shelter placement
111	Mace, Patricia	11/11/2021	 Opposed to digital images in shelters Unrelated project cited Aesthetics, seats, and landscaping of shelters Tree planting IS/MND Inadequate Driver distraction Visual impacts Advertising displays Power usage underestimated Full Traffic Study request Low estimate of negative public opinion EIR preparation request 	 See Response No. 6.3 on personal opinions See Response No. 7.11 on citing unrelated projects See Response No. 7.13 on aesthetic design, accessibility, and landscaping See Response No. 7.19 on tree planting See Response No. 7.1 on adequacy of the IS/MND See Response Nos. 2.1 and 2.2 on driver distraction See Response No. 1.1 on visual impacts See Response No. 7.16 on advertising displays See Response No. 3.1 on energy usage See Response Nos. 2.2 and 2.5 related to analysis on traffic hazards See Response No. 6.2 on public opinion See Response No. 7.2 on EIR preparation
112	Maddren, Casey	11/11/2021	 Project description inadequate Lack of sustainability of STAP components Power usage underestimated/greenhouse gas emissions 	 See Response No. 7.6 on project description See Response 4.1 on low-impact, natural, renewable, recyclable, and nontoxic materials See Response No. 3.1 on energy usage

Table RTC-1. Comment Letters received during Public Review Period

No.	Last Name, First Name	Date Submitted	Issue Raised	Responses
			 4. Infrastructure needed for data transmission and storage 5. Visual impacts 6. Light/glare 	 4. See Response No. 3.2 on energy consumption from data transmission and storage 5. See Response No. 1.1 on visual impacts 6. See Response No. 1.1 on visual and Response No. 2.4 on illumination levels
113	Mercer, Annette	10/17/2021	Public toilets	See Response No. 7.17 on public toilets
114	Morris, W.	11/2/2021	 References to Federal Aviation Administration (FAA) Driver distraction Visual impacts Power usage underestimated Full Traffic Study request Low estimate of negative public opinion EIR preparation request 	 See Response No. 7.21 on references to the FAA See Response Nos. 2.1 and 2.2 on driver distraction See Response No. 1.1 on visual impacts See Response No. 3.1 on energy usage See Response Nos. 2.2 and 2.5 related to analysis on traffic hazards. See Response No. 6.2 on public opinion See Response No. 7.2 on EIR preparation
115	Northwest San Pedro Neighborhood Council - Guzman, Christian	11/11/2021	 Extend public review period EIR preparation request Extend existing contract request Changes to Los Angeles Municipal Code (LAMC) Driver distraction Visual impacts Power usage underestimated Abide by adopted plans Digital signs in zoned areas Community input 	 See Response No. 7.4 on public review period See Response No. 7.2 on EIR preparation See Response No. 7.5 on request to extend contract See Response No. 5.5 on status of Council File 20-1563 See Response Nos. 2.1 and 2.2 on driver distraction See Response No. 1.1 on visual impacts See Response No. 3.1 on energy usage See Response No. 5.1 on community and specific plans; scenic highways; coastal zone and Response No. 5.2 on compliance with local plans See Response No. 5.3 on sign placement and zoning

Table RTC-1. Comment Letters received during Public Review Period

No.	Last Name, First Name	Date Submitted	Issue Raised	Responses
				10. See Response No. 6.1 on community input
116	Outfront Decaux - Wallace, Edward	11/12/2021	 IS/MND Inadequate Project description inadequate Changes to LAMC Information kiosks Delegation of power Unknown future projects Public toilets Mobility plan Driver distraction and traffic hazards Sign placement in right-ofway and LAMC 14.4.5 	 See Response No. 7.1 on IS/MND adequacy See Response No. 7.6 on project description See Response No. 7.7 on code changes See Response No. 7.8 on information kiosks See Response No. 7.9 on delegation of power See Response No. 7.10 on analysis of future and foreseeable projects See Response No. 7.17 on public toilets See Response No. 5.4 on mobility plan See Response Nos. 2.1 and 2.2 on driver distraction and traffic hazards from digital displays See Response No. 2.5 on applicability of LAMC 14.4.5 to right-of-way and Response No. 5.3 on sign placement and zoning
117	Pacific Palisades Community Council – Spitz, Christina	11/11/2021	 EIR preparation request Ownership of transit shelters Bus benches and street furniture Ability to opt in/out of Program Unknown future projects Driver distraction Visual impacts Power usage underestimated Low estimate of negative public opinion Changes to LAMC Light/glare Documentation attached 	 See Response No. 7.2 on EIR preparation See Response No. 7.18 on ownership of transit shelters and Metro projects See Response No. 7.14 on existing bus benches and related street furniture See Response 7.23 on opting in/out of Program See Response No 7.6 on project description, Response No. 7.7 on code changes, and Response No. 7.10 on analysis of future and foreseeable projects See Response Nos. 2.1 and 2.2 on driver distraction

Table RTC-1. Comment Letters received during Public Review Period

No.	Last Name, First Name	Date Submitted	Issue Raised	Responses
118	Palms Neighborhood Council - Hartman, Kay	11/9/2021	1 EIR preparation request 2 Ownership of transit shelters 3 Ability to opt in/out of Program 4 Unknown future projects 5 Driver distraction 6 Visual impacts 7 Power usage underestimated 8 Low estimate of negative public opinion	 See Response No. 1.1 on visual impacts See Response No. 3.1 on energy usage See Response No. 6.2 on Public Opinion See Response No. 7.7 on code changes See Response No. 1.1 on visual and Response No. 2.4 on illumination levels See Response No. 2.3 regarding attached documentation See Response No. 7.2 on EIR preparation See Response No. 7.18 on ownership of transit shelters and Metro projects See Response No. 7.23 on opting in/out of Program See Response No. 7.6 on project description,
			9 Changes to LAMC 10 Light emissions	Response No. 7.7 on code changes, and Response No. 7.10 on analysis of future and foreseeable projects 5. See Response Nos. 2.1 and 2.2 on driver distraction 6. See Response No. 1.1 on visual impacts 7. See Response No. 3.1 on energy usage 8. See Response No. 6.2 on public opinion 9. See Response No. 7.7 on code changes 10. See Response No. 2.4 on illumination levels
119	Roos, Sara	11/5/2021	Opposed to digital signs Environmental and health aspects ignored	 See Response No. 6.3 on personal opinions See Response No. 7.1 on adequacy of the IS/MND
120	Ross, Jay	11/9/2021	EIR preparation request Ownership of transit shelters Ability to opt in/out of Program	See Response No. 7.2 on EIR preparation See Response No. 7.18 on ownership of transit shelters and Metro projects

Table RTC-1. Comment Letters received during Public Review Period

No.	Last Name, First Name	Date Submitted	Issue Raised	Responses
			 Project description inadequate Unknown future projects Changes to LAMC Sign placement in right-of-way and LAMC 14.4.5 Driver distraction Visual impacts Light/glare Power usage underestimated Low estimate of negative public opinion Changes to LAMC Documentation attached 	 See Response 7.23 on opting in/out of Program See Response No. 7.6 on project description See Response No. 7.7 on code changes and Response No. 7.10 on analysis of future and foreseeable projects See Response No. 5.5 on status of Council File 20-1563 See Response No. 2.5 on applicability of LAMC 14.4.5 to right-of-way and Response No. 5.3 on sign placement and zoning See Response Nos. 2.1 and 2.2 on driver distraction See Response No. 1.1 on visual impacts See Response No. 1.1 on visual and Response No. 2.4 on illumination levels See Response No. 3.1 on energy usage See Response No. 6.2 on public opinion See Response No. 7.7 on code changes See Response No. 2.3 regarding attached documentation
121	South Park Business Improvement District - Gonzalez, Victor	11/12/2021	Shelter placement	See Response No. 7.15 on shelter placement
122	Stone, Nancy Rae	11/5/2021	EIR preparation request Digital signage effect on public safety Power usage underestimated	 See Response No. 7.2 on EIR preparation See Response Nos. 2.1 and 2.2 on driver distraction and traffic hazards from digital displays See Response No. 3.1 on energy usage
123	Twining, Stephen	11/9/2021	EIR preparation request	See Response No. 7.2 on EIR preparation

Table RTC-1. Comment Letters received during Public Review Period

No.	Last Name, First Name	Date Submitted	Issue Raised	Responses
124	Westside Neighborhood Council - Tippit, Terri	11/12/2021	 IS/MND inadequate EIR preparation request Visual impacts Digital signage effect on public safety Future projects unknown Changes to LAMC Extend existing contract request Advertising in public right-ofway Light emissions Shelter placement Recyclability of STAP components Energy usage questioned Ability to opt in/out of Program Documentation attached 	 See Response No. 7.1 on adequacy of the IS/MND See Response No. 7.2 on EIR preparation See Response No. 1.1 on visual impacts See Response Nos. 2.1 and 2.2 on driver distraction and traffic hazards from digital displays See Response No. 7.6 on project description and Response No. 7.10 on analysis of future and foreseeable projects See Response No. 7.7 on code changes See Response No. 7.5 on request to extend contract See Response No. 7.16 on advertising displays See Response No. 7.15 on illumination levels See Response No. 7.15 on shelter placement See Response 4.1 on lowimpact, natural, renewable, recyclable, and nontoxic materials See Response No. 3.1 on energy usage See Response No. 7.23 on opting in/out of Program See Response No. 2.3 regarding attached documentation
125	Westwood South of Santa Monica Blvd. Homeowners' Association - Broide, Barbara	11/12/2021	1. IS/MND inadequate 2. EIR preparation request 3. Extend existing contract request 4. Changes to LAMC 5. Community input 6. Ability to opt in/out of Program 7. Unrelated project cited 8. Digital signage effect on public safety 9. Project description inadequate 10. Unknown future projects 11. Visual impacts	documentation 1. See Response No. 7.1 on adequacy of the IS/MND 2. See Response No. 7.2 on EIR preparation 3. See Response No. 7.5 on request to extend contract 4. See Response No. 5.5 on status of Council File 20-1563 and Response No. 7.7 on code changes 5. See Response No. 6.1 on community input 6. See Response No. 7.23 on opting in/out of Program

Table RTC-1. Comment Letters received during Public Review Period

No.	Last Name, First Name	Date Submitted	Issue Raised	Responses
			12. Light/glare13. Energy usage underestimated14. Documentation attached	 See Response No. 7.11 on citing unrelated projects See Response Nos. 2.1 and 2.2 on driver distraction and traffic hazards from digital displays See Response No. 7.6 on project description See Response No. 7.7 on code changes and Response No. 7.10 on analysis of future and foreseeable projects See Response No. 1.1 on visual impacts See Response Nos. 1.1 on visual and Response No. 2.4 on illumination levels See Response No. 3.1 on energy usage See Response No. 2.3 regarding attached documentation
126	York, Jamie	11/8/2021	Bus bench functionality	See Response No. 7.20 on bus bench functionality