



**Friends of Griffith Park**

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February 3, 2011

Mr. Jon Foreman  
Department of City Planning  
City of Los Angeles  
200 North Spring Street, Room 601  
Los Angeles, CA 90012

Mr. Foreman:

Friends of Griffith Park is a charitable non-profit organization focused on advocacy, service, education, and support of Griffith Park. We recognize that events outside of the park's borders can greatly impact the park's natural balance and the many ways that the citizens of Los Angeles use the park for their recreational activities. By advocating for the vitality of nature and recreation in Griffith Park, we also advocate for the overall health of the Santa Monica Mountains Range and the Los Angeles River Corridor region.

Our comments to follow in this letter are grounded with the fact that Griffith Park is the largest natural wilderness within Los Angeles city limits, containing numerous distinct ecosystems that nurture significant populations of native plants and wildlife species. The Park is designated by the University of California at Los Angeles as a County of Los Angeles Critical Environmental Area, and is an essential link in the Southern California wildlife corridor stretching from the Santa Monica Mountains to the Verdugo Mountain Range. Griffith Park is a part of the Santa Monica Mountains Range, as is the NBC Universal property.

Regionally, these habitat areas are within the California Floristic Province, one of 34 biodiversity hotspots for conservation worldwide according to Conservation International. This area is designated as such due to its high levels of diversity, endemism, and the degree to which it is threatened. These Mediterranean-climate habitat areas are severely limited worldwide, and are being lost at a high rate, a rate much faster than tropical rain forests are being lost.

Finally, Griffith Park is a Historic-Cultural Monument, a designation bestowed upon cultural and historic treasures by the City of Los Angeles.

We submit the following concerns based upon our reading and understanding of the NBC Universal Evolution Plan.

## COMMENTS:

### **Large missing study area:**

A very large area east of the proposed Project has not been considered in the DEIR. In particular, areas east are missing in the biota and traffic sections. Griffith Park is the most obvious large neighbor to the east, and the DEIR discounts and obfuscates the proposed Project's impacts on Griffith Park. The DEIR claims Griffith Park is "*approximately one mile east*" of the proposed Project and "*is not directly connected to the habitats on the project site*". In fact, Griffith Park is considerably closer than one mile to the proposed Project site. Furthermore, significant areas of open space directly east of Barham Blvd provide excellent connectivity to the project site, yet the DEIR avoids reference to that open space between the proposed Project and Griffith Park. Including the open space areas just east of Barham, the total amount of intact native habitat is considerably larger than the 4300+ acres of Griffith Park itself.

The impacts to Griffith Park by such a grandiose development include biological, traffic, light/glare, and noise/visual, all at critical proportions. Especially for a park that fulfills passive recreational needs for so many residents and for a park that is comprised of such rich and diverse ecosystems, these impacts deserve to be studied to see if they can be mitigated or the scale of the project should be reduced.

### **Cumulative Impact:**

Much more attention should be paid to the wholesale environmental impact resulting from the simultaneous development of multiple projects of significance within a close vicinity east of the proposed Project, including: Forest Lawn Hollywood Hills, Oakwood Apartments, Headworks, and the Headworks-adjacent wetlands project in the "spreading grounds" area of Griffith Park. Portions of these proposed developments contain large amounts of relatively undisturbed habitat from both a geological and biological perspective. Natural ecosystems are present including large mammals. The collective loss of this habitat represents a massive reduction of open space within the eastern portion of the Santa Monica Mountain Range. The possible degradation of biological resources, including its consequent impact on recreational use such as nature hiking should be viewed holistically.

Care should be taken such that simultaneous development of these projects not result in the collapse of native ecosystems, loss of wild species, and loss of corridors and "stepping stone" areas critical to the maintenance of healthy species genepools, even for ecosystems which may be much further away. The eastern edge of the Santa Monica Mountain range is under heavy development if one looks at it from an overall cumulative prospective, as required by CEQA. (more comment on wildlife corridors to follow)



Cumulative impacts for traffic are even further accelerated with the concurrent MTA development on the west side of the proposed Project, in addition to the projects proposed on the eastern side. Insufficient infrastructure is in place to accommodate the potential increase in traffic, and additional proposed infrastructure does little to avert a significant choked traffic scenario for the local area.

### **Lack of Credence to LA River Corridor Plans:**

The Los Angeles River should be a major consideration for the Project. Referring to it as a “channel”, the Plan shows lack of vision into the next decades and centuries when those channels may gradually disappear on their own, if not be removed manually to lend nature a hand. The Plan also shows little coordination with two overriding plans which aim to drive positive change for a 50-plus mile stretch of the Los Angeles River: 1) the Los Angeles City Revitalization Master Plan and 2) the County Los Angeles River Master Plan. Of particular concern is that the proposed Project does not promote increased public access and usage. Continuity of a bicycle path along the river is paramount, in addition to enhancing contiguous greenways all along the river for public enjoyment and usage.

Portions of the Los Angeles River flowing through and abutting Griffith Park are already being reclaimed as a natural riparian zone and exhibit an exceptional degree of biodiversity in its plants, mollusks, fish, reptiles, amphibians, birdlife, and mammals. In the future, the Los Angeles River will serve a more vital role as prime habitat for wildlife and a valuable means for wildlife movement between relatively isolated habitats. This is an important aspect to be considered when roads and infrastructure separate habitats, such the separation of Elysian Park and Griffith Park, and the separation of Griffith Park and the NBC Universal complex.

Consistency and coordination with the outstanding river plans will be demanded by the City and County of Los Angeles, or by their citizens. Therefore, a Supplemental DEIR which mitigates and/or changes the proposed Project such that the goals of the two river master plans are sufficiently and aptly met is mandatory.

### **Traffic and Impact on Griffith Park**

The DEIR shows studies conducted far to the west of the project site, yet to the east the traffic study terminates at the Forest Lawn Drive / Zoo Drive / Interstate-5 location. Especially since the proposed Project calls for the widening of Forest Lawn Drive within Griffith Park itself, the study falls short in analyzing the impact on Griffith Park. There is reason to believe the impact could be frighteningly significant, especially to anyone that frequents Griffith Park during rush hour!

The vehicular through-traffic, in both directions, from Forest Lawn / Zoo Drive, continuing past the Autry complex, continuing to Crystal Spring Drive, has been on an increase over



the last few years. With Burbank Studio parking structures now on Forest Lawn Drive, putting many studio employees convenient to Forest Lawn Drive, more commuters now use Griffith Park to bypass the Interstate system, especially at rush hours. To add to the traffic on Forest Lawn Drive – an inevitable result of it being widened - will certainly add traffic to Griffith Park, particularly Zoo Drive and Crystal Springs Drive.

“Quality of experience” is an attribute that park users expect “above and beyond” that which one expects in a non-park setting. In CEQA terms, the impacts are the noise, the air pollution, and the degradation of viewshed which traffic causes. Even more important is the safety considerations when the roads of the park are being shared with runners, hikers, bicyclists, and picnickers crossing a road in search of a relaxing spot.

Additionally, the DEIR indicates widening the I-5 / Forest Lawn connections, but does not elaborate on impacts on the Martinez Area facility, the adjacent equestrian trails, nor the equestrian activities held at that location periodically.

Anecdotally, it is well-known that wildlife kill rates on Forest Lawn Drive are very high. Road-killed bobcats have been documented on Forest Lawn Drive, in fact. The Plan does not include a proper study of animal movement across that road, and does not offer any mitigative measures such as a wildlife bridge or culvert.

The widening of Forest Lawn Drive needs much further research and study. This should be an important aspect of a Supplemental DEIR. The Supplemental DEIR should include alternatives to the widening of Forest Lawn Drive and measures that will reduce traffic flow into Griffith Park.

### **Biological Resources and Wildlife Corridors**

The destruction of such a large amount of open space, especially the loss of many which are the richest of habitats - oak woodland and native oak-walnut areas - is excessive and unwarranted. Support and protection of wildlife in the severely limited remaining habitat is questionable, given the proposed surrounding infrastructure.

In the context of providing, at a minimum, areas of linkage for wildlife movement across the property, the Plan offers few solutions. Although the DEIR recognizes that animals such as mule deer and California quail are seen on the property currently, it fails to recognize that these animals are not simply urban-adapted species. These are species that require large habitat area for success. They require connectivity to other areas, namely the areas to the west, across Cahuenga Pass, and the area to the east, Griffith Park. Their mere presence illustrates the importance of this property as a connector to larger habitat areas. Yet, the DEIR erroneously claims “*The Project Site does not act as a true wildlife corridor, movement pathway, or linkage between larger habitat areas for terrestrial wildlife.*” We suggest that loss of native habitat on the Project Site could be the “straw that broke the camel’s back”. These mini-ecosystems can not be replicated in a place of

importance simply by replanting oak trees as a mitigation measure at a different location. There is no location as important as the location where these habitats now exist. Nor can these mini-ecosystems ever be replicated, at all.

The impact of the proposed project on wildlife connectivity needs to be addressed further to resolve inconsistencies of claims and facts. This may result in no other choice but a drastically reduced project scope and smarter allowance for linkage habitats to be placed strategically across the property, allowing for wildlife movement with minimal mortality.

Regarding specific fauna not surveyed on the proposed site, we suggest a thorough survey be conducted of bat species present. The DEIR suggests that the Western Red Bat (a species of special concern) "has low potential to roost and forage on-site". Yet they are documented close-by in Griffith Park (Remington-Cooper, 2009). The ponds and the buildings on the Project Site may be perfect attractors for various bat species.

The Western Grey Squirrel is mentioned as an urban-adapted species. The DEIR may be in error on that fact, and since the Western Grey Squirrel was not found on the property, the researchers may be confusing it with the Eastern Fox Squirrel.

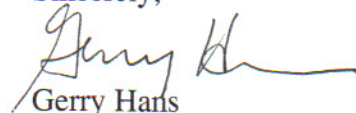
### **Historic-Cultural Monument**

Griffith Park, as a Historic-Cultural Monument, must be respected as such by all projects which may affect it. A significant impact which should be studied in that regard is the visual impact from the park's upper terrain, especially considering the major lighting and structural build-out of the proposed Project. The LA City Cultural Heritage Commission has jurisdiction over these sensitive historical and cultural elements. Accordingly, they should be advised for consultation and entitlements.

### **Summary**

Respectfully, the concerns highlighted in this letter have not been adequately considered and/or mitigation measures have not been adequately addressed. For this reason, we suggest that a Supplemental DEIR is necessary to address all of these concerns so that further comment can be made, prior to moving forward with a final EIR. Assuming this is the procedure NBC Universal Evolution Plan will choose, it is our overall opinion that the scope of the project must be reduced drastically in order to fully comply with CEQA mitigation requirements.

Sincerely,

A handwritten signature in dark ink, appearing to read "Gerry Hans", is written over a horizontal line.

Gerry Hans  
President

Friends of Griffith Park