



## Friends of Griffith Park

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April 12, 2011

Mr. Adam Villani, EIR Unit  
Department of City Planning  
City of Los Angeles  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

Re: Draft Environmental Impact Report, Forest Lawn Memorial Park  
ENV-2007-1060-EIR

Mr. Villani:

### **SUMMARY:**

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 – particularly those in close proximity - greatly impact the park's natural balance and the many ways that the citizens of Los Angeles use the park for their recreational activities. Therefore, we advocate for the overall biological health of the Santa Monica Mountains Range and the Los Angeles River Corridor region.

To maintain Griffith Park's natural and recreational elements, and to preserve the natural qualities of the entirety of the Santa Monica Mountain Range, **we support Alternative 5 as a viable plan**, whereby Forest Lawn may still significantly expand and develop its private property while minimizing negative impacts on contiguous Griffith Park. This recommendation is made irrespective of our recognition that Forest Lawn has already removed large amounts of natural habitat from its property over the last years. Our understanding is that the more recent scraping of acreage has been done entirely under a "conditional use permit" dating back to 1948, predating CEQA statute. Except for the removal of 400+ oak trees (L.A. Superior Court Case No C187405, settled with City of Los Angeles in closed City Council session in 1998), we have been advised by Forest Lawn representatives that there is a legal basis for those activities which, of course, we aptly respect.

We note that Forest Lawn management's preferred expansion plan (proposed plan), along with Alternatives 2 and 3, will negatively affect Griffith Park in a variety of ways. Our following comments reflect our most important thoughts on the Draft Environmental



Impact Report (DEIR).

**SPECIFIC COMMENTS:**

**Errata:** The Final Environmental Impact Report (FEIR) should correct the current assertion that Griffith Park is an “island” and is largely isolated. The mere fact that wildlife is seen in the Cahuenga Pass and on the Forest Lawn property itself, clearly contradicts the opinion put forth in the DEIR that there are “no discernable corridors or critical pathways for terrestrial wildlife...” If wildlife can be seen, it is clearly “discernable.” On a scientific basis, in fact, a study is now underway to qualify and take initial steps to quantify wildlife movement across the Cahuenga Pass (attached project description, Griffith Park Natural History Survey’s Wildlife Corridor Survey).

This following statement should also be corrected for the FEIR: Sennett Creek “has no direct ecological connection with the Los Angeles River, as it did once.” Sennett Creek, in fact, connects flow of water directly to the Los Angeles River, and should be treated as a very active ecological connection. Portions of the connection and the River may currently have man-made culverts or channels, but the importance of it is still paramount.

**Consequence of Riparian Habitat Loss:** No habitat type is more critical and more limited than Santa Monica Mountain Range riparian habitat with year-round water flow. Natural seeps within Griffith Park provide the year-round source of water which seamlessly flows through Forest Lawn’s property to the Los Angeles River via Sennett Creek. The importance of that natural water flow originating from these drainages cannot be overstated. The proposed installation of nine debris basins sounds the alarm that key riparian habitat would be impacted, and that the natural current flow of water might be altered. Furthermore, going upstream from any new basins, it is necessary that the FEIR consider negative impacts on all wildlife in Griffith Park that may be adversely affected.

In addition to mammals, less terrestrial fauna such as amphibians and reptiles are permanent residents of this habitat type and rely on its riparian cover, to disperse and migrate along that water-laden route to the Los Angeles River and beyond. The migration is both directions. Impediments are critical and loss of any of habitat along the route is critical.

The proposed plan 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. Especially as these revitalization plans contemplate a more natural river in the future, the Sennett Creek corridor, connecting the river to higher Griffith Park habitat, may play an even more important role as a corridor in the future. This puts an extraordinary value on the biological purposes Sennett Creek may serve into the future, as well its upper tributaries which are in jeopardy due to the proposed project. The FEIR should consider this fact and should properly recognize these river revitalization Master Plans. The FEIR should also



deal with the reality that there may be no way to mitigate the loss of full functionality of this very special riparian corridor.

An environmentally superior approach by Forest Lawn is to reduce the scale of its proposed project. Avoiding loss of riparian habitat and avoiding infringements to corridors is critical. Mitigation may not be impossible and the DEIR does not provide sound mitigation possibilities, whereas down-sizing the development scope, at a significantly lower development cost, is a best choice. Alternatively, the FEIR must produce evidence of mitigation to achieve impacts considered to be less than significant.

**Intact Ecosystem Not Adequately Mitigated:** The scarcity of rich habitat, especially the habitat at the southeast corner of the Forest Lawn property leading up to Royce Canyon, increases its value. As an intact ecosystem, it is irreplaceable. Even if mitigation measures were ample enough to replace its various components (the coast live oaks, the sycamores, the toyon, the lilies, etc.) the synergistic total of those components can never be replicated to create an ecosystem as complex and sustainable as the current habitat. Separate mitigation plans, (tree-replacement, bulb-salvage, seed collection, etc.) will not replace the integrated ecosystem that may be lost through the proposed development.

The proposed plan fails to adequately acknowledge that ecosystems can be mitigated by merely mitigating some of the ecosystem's components. The proposed plan also misses in even identifying important components of an intact ecosystem, such as understory floral species, for which even on a component level the proposed plan offers no mitigation.

There is much difficulty when one begins contemplating mitigation of complex ecosystems. In this case, even the component species are not completely evaluated and/or have no mitigation plans. As this difficulty becomes pronounced and probably not even achievable, the alternative of scaling back the project should be considered. The DEIR does not produce mitigation measures nearly sufficient to convince us that impacts to plant communities can be reduced to a level less than significant.

**Cumulative Impact:** Multiple projects in the vicinity of Forest Lawn are listed in the DEIR, projects proposed and projects already underway. The sum of many projects, even if they are appropriately dealt with as independent projects, must be evaluated and mitigated for their collective impacts, as well. In particular, the loss of biological habitat (Forest Lawn's in combination with other projects'), as an ever-decreasing core resource, has cumulative impacts which are not truly evaluated at all.

In addition to core habitat loss, the cumulative loss of areas important to wildlife movement, whether that habitat is contiguous or not, must be evaluated. As the task of actually conducting the assessments of cumulative biological resource impacts and finding ways of mitigating those cumulative impacts becomes difficult or impossible, it becomes apparent that a lower-scale alternative project is a best choice.



**Further Study Necessary:** Several categories of biological resources seem to be under-studied or not studied at all. First, bats need to be surveyed for their presence on the property. The Western Red Bat, a species documented in Griffith Park, would be expected to be present on the Forest Lawn property. It and other species are listed as California Species of Concern. Possible nesting and rearing areas, including natural habitat and buildings, should be surveyed. Only after results of this survey are known, may mitigation measures be proposed.

Second, raptor species are under-studied. Both diurnal and nocturnal surveys should be conducted in order to fully evaluate owls and other raptors. Perigrine and White-tailed Kite, federally protected, occur in adjacent areas, therefore it is imperative that the loss of sycamores and oaks, on a cumulative basis with all other related projects, be evaluated in particular for those species.

Third, besides hundreds of CNPS Rare plant species identified on the property, a Brodiaea species, only tentatively identified as *B. terrestris* ssp. *Kernensis*, is not given stature because it is not CNPS listed. However, it may be the only representation of this species in the entire Santa Monica Mountain area, so should be considered.

**Fence Dilemma:** During a discussion with Forest Lawn, their representative indicated that fencing at Griffith Park borders is necessary. The DEIR also states that the existing fencing is permeable to wildlife. However, the extent of its current permeability was not adequately studied, and the resultant, post-development permeability was also not adequately studied. Any additional fencing should consider its permeability to wildlife, and details of this should be included in the FEIR. To the extent that Cemetery Law regarding fencing collides with the threshold need for wildlife movement along the long border of the Forest Lawn property, the project's scale must be downsized to meet acceptable levels of permeability.

**Conclusion:** As stated in our opening summary, we recommend Project Alternative 5, for all the aforementioned reasons. Because of the short duration given to us to respond to the DEIR, despite a sixty-day extension request, subsequent comments may follow.

Sincerely,



Gerry Hans  
President  
Friends of Griffith Park