

**EXHIBIT A**

**APPROVED**

REPORT OF GENERAL MANAGER

APR 02 2014

NO. 14-061

DATE March 5, 2014

BOARD OF RECREATION  
1 PARK COMMISSIONERS

C.D. 4 and 13

BOARD OF RECREATION AND PARK COMMISSIONERS

SUBJECT: GRIFFITH PARK CRYSTAL SPRINGS - NEW BASEBALL FIELDS  
(W.O. #E170110B) PROJECT - CERTIFICATION OF THE FINAL  
ENVIRONMENTAL IMPACT REPORT AND APPROVAL OF THE PROJECT

R. Adams	<u>                    </u>	V. Israel	<u>                    </u>
*R. Barajas	<u><i>Barajas</i></u>	K. Regan	<u>                    </u>
H. Fujita	<u>                    </u>	N. Williams	<u>                    </u>

*as amended  
see attached*

*[Signature]*  
General Manager

Approved                      Disapproved                      Withdrawn                     

RECOMMENDATIONS:

That the Board:

1. Review, consider, and certify the Final Environmental Impact Report (FEIR), on file in the Board Office, prepared by and posted on the Department of Public Works Bureau of Engineering website, [http://eng.lacity.org/techdocs/emg/griffith\\_park\\_baseball\\_field.htm](http://eng.lacity.org/techdocs/emg/griffith_park_baseball_field.htm), for the proposed Griffith Park Crystal Springs - New Baseball Fields (W.O. #E170110B) project, finding that all potentially significant environmental effects of the project have been properly disclosed and evaluated in compliance with the California Environmental Quality Act (CEQA) and the State and City CEQA Guidelines, and that the FEIR reflects the Department of Recreation and Parks' (RAP) independent judgment and analysis;
2. Review, consider, and adopt the Mitigation Monitoring and Reporting Plan for the proposed project, published under separate cover, that specifies the mitigation measures to be implemented in accordance with the CEQA Guidelines (Section 15407(d)), and monitoring requirements for those measures;
3. Adopt the Findings of Fact and the Statement of Overriding Considerations for the proposed project, published under separate cover;
4. Approve the proposed project (also referred to as the preferred project) as described in the FEIR; and,

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5. Request the Bureau of Engineering (BOE) to file a Notice of Determination with the Los Angeles City Clerk and the Los Angeles County Clerk within five (5) working days of the Board certifying the FEIR.

SUMMARY:

Griffith Park is one of the largest municipal parks in the nation, approximately 4,200 acres in size. The Park was established in 1896 by the donation of private land owned by Colonel Griffith J. Griffith to the city of Los Angeles and is under the jurisdiction of the Department of Recreation and Parks. In 2009, the City designated Griffith Park as Historic-Cultural Monument (HCM) No. 942. The four-acre project site is located within the Crystal Springs Picnic Area of Griffith Park, immediately south of the Wilson and Harding Golf Courses. The site is not identified as a contributing feature of the Griffith Park HCM, but its open space and many native and ornamental trees provide important environmental, aesthetic, horticultural and sociological value.

The proposed Griffith Park Crystal Springs - New Baseball Fields (W.O #E170110B) project calls for the construction of two (2) new youth baseball fields within the existing Crystal Springs Picnic Area. Each baseball field would consist of natural grass and dirt playing surface, two (2) dugouts, bleachers, outfield/perimeter fencing and scoreboards. The project also includes landscaping and an irrigation system. The northeast segment of the access loop driveway, which currently allows circulation around the Crystal Springs Picnic Area, would be eliminated and a cul-de-sac would be constructed at each terminus of the impacted loop driveway segment. Construction of the northern cul-de-sac would eliminate five (5) parking spaces. Additionally, approximately seven (7) picnic tables would be relocated.

In accordance with the requirements of the California Environmental Quality Act (CEQA), BOE prepared an Environmental Impact Report (EIR) for the project. The Final EIR (FEIR) is comprised of the Draft EIR (DEIR) and its appendices; comments received during the public hearing and the forty-five (45)-day review period and the City's responses to significant environmental issues raised; clarifying information and minor modifications pertinent to the DEIR; the FEIR appendices; a document containing the Findings of Fact and the Statement of Overriding Considerations, Sections 1-3 and Section 4, respectively; and the Mitigation Monitoring and Reporting Plan.

The FEIR discloses that the project would result in significant environmental impacts related to aesthetics, biological resources, cultural resources (includes historic, archaeological and paleontological resources), and noise. Implementation of feasible mitigation measures would reduce impacts related to cultural resources (project-specific) and noise to a less-than-significant level. However, no feasible mitigation measures were identified that would both address resulting impacts on aesthetics and meet the project objectives; therefore, significant impacts

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related to aesthetics would be adverse and unavoidable. The project would also result in cumulative impacts related to historic, archaeological and paleontological resources.

Based on the conceptual site layouts, it is estimated that the proposed project would require the removal of forty-five (45) trees (and may temporarily impact four [4] additional trees) of the 67 trees recorded on the site. Among the trees to be removed are protected and heritage trees; such as Black Walnuts, Coast Live Oaks, and California Sycamores, that are unique trees because of their size and maturity and visual and ecological qualities. Although the project would comply with City ordinances and policies with respect to protected and heritage trees, it is possible that this impact may not be mitigated to a less than significant level. Therefore, the removal and relocation of trees could cause unavoidable significant impacts relative to biological resources. The replacement trees, along with any trees that would be relocated, would be planted at appropriate locations within Griffith Park under the approval and direction of the Department of Recreation and Parks' Forestry Division.

The Draft EIR was circulated to all interested parties and responsible agencies for a forty-five (45) day review and comment period from October 31, 2013 through December 17, 2013. In addition, BOE also held a public hearing on the EIR on November 20, 2013. During this public review and comment period, approximately 180 comment letters from individuals and 330 form letters were received expressing both support of, or opposition to, the project. Significant environmental issues raised included tree removal, alternatives, transportation and traffic impacts, and changes in recreational use. All comments that were received, and City responses to significant environmental issues raised, were incorporated into the FEIR along with the transcript of the public hearing. A Mitigation Monitoring and Reporting Plan (MMRP) has been prepared that specifies all of the feasible mitigation measures identified in the FEIR, which will either reduce or eliminate the potentially significant environmental impacts of the project in accordance with Section 15097 of the State CEQA Guidelines. However, as described above, the project would result in unavoidable, significant adverse impacts to aesthetic and biological resources, and cumulative impacts to cultural resources, and as such, requires that the Board adopt the Findings of Fact (Findings) and the Statement of Overriding Considerations prior to taking action to approve the project. The Findings is a written statement made by the decision-making body of the lead agency that explains how it dealt with each significant impact and alternative in the EIR. The Statement of Overriding Considerations explains in detail why the social, economic, legal, technical or other beneficial aspects of the project outweigh the unavoidable, adverse environmental impacts, and why the lead agency is willing to accept such impacts.

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Funding for this project will be from the Proposition K and Quimby Act programs. Upon certification of this Final EIR by the Board of Recreation and Park Commissioners, BOE and RAP staff will proceed with the design of the project and completion of the construction documents. The completed construction documents will then be presented to the Board for approval and call for bids.

~~The offices of Council District 4 and Council District 13 are in support of the proposed project at the proposed location within the Griffith Park Crystal Springs (North) Picnic Area.~~

### FISCAL IMPACT STATEMENT:

There is no immediate fiscal impact to RAP's General Fund. The assessments of the future operations and maintenance costs have yet to be determined and will be addressed in future budget requests.

This Report was prepared by Sean H. Phan, Project Manager, BOE Recreation and Cultural Facilities Program. Reviewed by Maria Martin, Environmental Supervisor II, Environmental Management Group; Neil Drucker, Program Manager, BOE Recreational and Cultural Facilities Program; Ted Allen, Acting Deputy City Engineer, Bureau of Engineering; and Cathie Santo Domingo, Superintendent, Planning, Construction and Maintenance Branch, Department of Recreation and Parks.

EXCERPT FROM THE MINUTES OF THE REGULAR MEETING  
BOARD OF RECREATION AND PARK COMMISSIONERS  
APRIL 2, 2014

14-061

GRIFFITH PARK CRYSTAL SPRINGS - NEW BASEBALL  
FIELDS (W.O. #E170110B) PROJECT - CERTIFICATION OF  
THE FINAL ENVIRONMENTAL IMPACT REPORT AND  
APPROVAL OF THE PROJECT

(Original Date - 3/5/14)

Cathie Santo Domingo amended the report to replace the second paragraph on page 4 of the report with the following language:

"The offices of Council District 4 and Council District 13 support active recreation and baseball (adult and youth) fields in the Crystal Springs area of Griffith Park. Neither office supports the North Atwater Park alternative."

The above item was presented to the Board by Department staff, and the Board further discussed the item in detail. Public comment was invited on the item. Thirty-seven requests for public comment were received and such comments were made to the Commission.

In response to comments made by Commissioner Sanford, Cathie Santo Domingo recommended the report be further amended to add a recommendation to direct staff to provide a report back addressing the mitigation of the trees and addressing the specific usage of the facility.

It was moved by Vice President Zuñiga, seconded by Commissioner Patsaouras, that General Manager's Report 14-061 be approved as amended, and that the Resolutions recommended in the report be thereby approved. There being no objections, the Motion was unanimously approved.

**EXHIBIT B**

## MINUTES

### BOARD OF RECREATION AND PARK COMMISSIONERS OF THE CITY OF LOS ANGELES

April 2, 2014

The Board of Recreation and Park Commissioners of the City of Los Angeles convened in regular session at the EXPO Center at 9:41 a.m. Present were President Lynn Alvarez, Vice President Iris Zuñiga and Commissioners Sylvia Patsouras and Misty M. Sanford. Also present were Michael A. Shull, General Manager, and Deputy City Attorney Arletta Maria Brimsey.

The following Department staff was present:

Regina Adams, Executive Officer  
Kevin Regan, Assistant General Manager, Operations Branch  
Vicki Israel, Assistant General Manager, Partnership and Revenue Branch  
Ramon Barajas, Assistant General Manager, Planning, Construction, and Maintenance Branch  
Noel Williams, Chief Accounting Employee, Finance Division

#### APPROVAL OF THE MINUTES

It was moved by Commissioner Patsouras, seconded by Vice President Zuñiga, that the Minutes of the Meeting of March 19, 2014 be approved. There being no objections, the Motion was unanimously approved.

#### GENERAL MANAGER'S REPORTS

##### 14-078

DEARBORN PARK – IRRIGATION AND FIELD IMPROVEMENTS  
(W.O. #E170332F) PROJECT – APPROVAL OF FINAL PLANS AND  
CALL FOR BIDS

Cathie Santo Domingo, Superintendent, amended the City Engineer's estimate for the additional construction costs, listed in paragraph 2, on page 2 of the report to \$250,000.00.

##### 14-079

1ST AND BROADWAY CIVIC CENTER PARK – PARK  
DEVELOPMENT (PRJ20655) PROJECT – AUTHORIZATION TO  
DEMOLISH, APPROVAL OF DEMOLITION PLANS, ALLOCATION  
OF QUIMBY FEES, AND EXEMPTION FROM THE CALIFORNIA  
ENVIRONMENTAL QUALITY ACT

The report was withdrawn.

##### 14-080

GREEK THEATRE CONCESSION – AMENDMENT TO CONTRACT  
NO. 3444 WITH STRATEGIC ADVISORY GROUP LLC  
(CONSULTANTS)



April 2, 2014

14-082

SUMMER LUNCH PROGRAM – NATIONAL RECREATION AND  
PARK ASSOCIATION 2014 OUT-OF-SCHOOL TIME PROGRAMS  
GRANT – AUTHORIZATION TO SUBMIT GRANT APPLICATION;  
ACCEPTANCE OF GRANT FUNDS

14-083

VARIOUS DONATIONS OPERATIONS BRANCH – METRO

14-084

VARIOUS COMMUNICATIONS

The above items were each separately described and presented to the Board by Department staff, and the Board further discussed various of the items in detail. Public comment was invited on all items of the agenda. One request for public comment was received and such comment was made to the Commission.

It was moved by Vice President Zuñiga, seconded by Commissioner Patsouras, that the General Manager's Reports be approved as amended, and that the Resolutions recommended in the reports be thereby approved. There being no objections, the Motion was unanimously approved.

14-081

TRAVEL TOWN MUSEUM GIFT SHOP CONCESSION –  
AMENDMENT NO. 2 TO CONCESSION CONTRACT NUMBER 262  
AND DONATION OF A NEW MODULAR BUILDING

Pursuant to advice received by the City Attorney, President Alvarez recused herself from acting on this item.

After President Alvarez exited the room, the meeting was chaired by Vice President Zuñiga.

Based on comments provided in the Concession Task Force meeting, Noel Williams, Chief Accounting Employee, amended the contract to state that only for the financial information, that in Year Five of the operation of the Agreement, staff would begin evaluating and negotiating with the Non-Profit for financial terms to take effect during Year Seven. Those terms would be either the greater of 5% of revenues, or the stated amount which is in the contract for the next evaluation period.

The above item was presented to the Board by Department staff, and the Board further discussed the item in detail. Public comment was invited on the item. Six requests for public comment were received and such comment was made to the Commission.

It was moved by Commissioner Patsouras, seconded by Commissioner Sanford, that General Manager's Report 14-081 be approved as amended, and that the Resolutions recommended in the report be thereby approved. There being no objections, the Motion was unanimously approved.

April 2, 2014

UNFINISHED BUSINESS

Memorandum: LOS ANGELES POLICE DEPARTMENT – PROPOSED MEMORANDUM  
OF AGREEMENT  
(Original Date – 4/17/13)

The report was held.

14-009

PARKS INITIATIVE – LAUREL CANYON/MULHOLLAND OPEN  
SPACE ACQUISITION PROJECT, 8100 WEST MULHOLLAND  
DRIVE – REQUEST FOR FINAL AUTHORIZATION TO ACQUIRE  
PROPERTY – ESCROW INSTRUCTIONS AND LEGALLY  
OBLIGATED ACQUISITION COSTS, PURCHASE AND SALE  
AGREEMENT, ALLOCATION OF PROPOSITION K FUNDS, AND  
EXEMPTION FROM THE CALIFORNIA ENVIRONMENTAL  
QUALITY ACT

(Original Date – 1/22/14)

Commissioner Sanford requested that the report be amended to add a recommendation directing staff to negotiate a maintenance agreement with Mountains Recreation and Conservation Authority.

14-047

PLAYGROUND AND RECREATION RELATED EQUIPMENT,  
ACCESSORIES, AND SUPPLIES CONTRACT – USE OF THE  
NATIONAL JOINT POWERS ALLIANCE (NJPA) SELECTION  
PROCESS FOR PLAYGROUND AND RECREATION RELATED  
EQUIPMENT, ACCESSORIES, AND SUPPLIES WITH  
PLAYPOWER, INC.

(Original Date – 3/5/14)

14-048

PLAYGROUND EQUIPMENT, SURFACING, SITE FURNISHINGS,  
AND RELATED PRODUCTS AND SERVICES CONTRACT – USE  
OF THE STATE OF NORTH CAROLINA, COUNTY OF  
MECKLENBURG SELECTION PROCESS TO PROVIDE  
PLAYGROUND EQUIPMENT, SURFACING, SITE FURNISHINGS  
AND RELATED PRODUCTS AND SERVICES (CONTRACT NO.  
110179) WITH PLAYCORE WISCONSIN, INC. DBA GAMETIME

(Original Date – 3/5/14)

14-049

RECREATION AND PARKS EQUIPMENT CONTRACT – USE OF  
HOUSTON-GALVESTON AREA COUNCIL SELECTION PROCESS  
FOR RECREATION AND PARKS EQUIPMENT, SERVICE AND  
INSTALLATION WITH LANDSCAPE STRUCTURES, INC.

(Original Date – 3/5/14)

April 2, 2014

14-050

ALTERNATIVE ENERGY EQUIPMENT CONTRACT – USE OF HOUSTON-GALVESTON AREA COUNCIL SELECTION PROCESS FOR THE PURCHASE OF ALTERNATIVE ENERGY EQUIPMENT AND INSTALLATION SERVICES WITH SOLARWORLD AMERICAS LLC

(Original Date – 3/5/14)

The above items were each separately described and presented to the Board by Department staff, and the Board further discussed various of the items in detail. Public comment was invited on all items. Two requests for public comment were received and such comments were made to the Commission.

It was moved by Commissioner Sanford, seconded by Vice President Zuñiga, that the General Manager's Reports be approved as amended, and with exceptions as noted, and that the Resolutions recommended in the reports be thereby approved. There being no objections, the Motion was unanimously approved.

14-062 - Taken Out of Order

GRIFFITH PARK – PERFORMING ARTS CENTER (W.O. #E170202A) PROJECT – ADOPTION OF THE INITIAL STUDY/MITIGATED NEGATIVE DECLARATION AND CONCEPTUAL APPROVAL OF THE PROJECT

(Original Date – 3/5/14)

The above item was presented to the Board by Department staff, and the Board further discussed the item in detail. Public comment was invited on the item. Thirty-nine requests for public comment were received and such comments were made to the Commission.

It was moved by Commissioner Sanford, seconded by Vice President Zuñiga, that General Manager's Report 14-062 be approved, and that the Resolutions recommended in the report be thereby approved. There being no objections, the Motion was unanimously approved.

14-061

GRIFFITH PARK CRYSTAL SPRINGS – NEW BASEBALL FIELDS (W.O. #E170110B) PROJECT – CERTIFICATION OF THE FINAL ENVIRONMENTAL IMPACT REPORT AND APPROVAL OF THE PROJECT

(Original Date – 3/5/14)

Cathie Santo Domingo amended the report to replace the second paragraph on page 4 of the report with the following language:

"The offices of Council District 4 and Council District 13 support active recreation and baseball (adult and youth) fields in the Crystal Springs area of Griffith Park. Neither office supports the North Atwater Park alternative."

April 2, 2014

The above item was presented to the Board by Department staff, and the Board further discussed the item in detail. Public comment was invited on the item. Thirty-seven requests for public comment were received and such comments were made to the Commission.

In response to comments made by Commissioner Sanford, Cathie Santo Domingo recommended the report be further amended to add a recommendation to direct staff to provide a report back addressing the mitigation of the trees and addressing the specific usage of the facility.

It was moved by Vice President Zuñiga, seconded by Commissioner Patsaouras, that General Manager's Report 14-061 be approved as amended, and that the Resolutions recommended in the report be thereby approved. There being no objections, the Motion was unanimously approved.

#### COMMISSION TASK FORCES

Commission Task Force on Facility Repair and Maintenance (Commissioners Blumenfield and Sanford)

Commissioner Patsaouras reported that there was a contract on golf and tennis reservation systems that would be coming before the full Board in May. There was also a report on the Lummis Home regarding Request for Proposals (RFP). Staff has extended the due date on the RFP and will conduct additional outreach to broaden the search for potential proposers. Lastly, the Travel Town agreement which was approved earlier in the meeting was amended based on comments provided in the Concessions Task Force meeting.

Commission Task Force on Concessions (Commissioners Patsaouras and Zuñiga)

Commissioner Sanford reported that staff will work to reschedule the Facility Task Force meetings to take place after the Board of Recreation and Park meetings to allow time for more in depth discussions. She further reported that staff discussed the request for the reconsideration of the placement of a monument in Solano Canyon and the review of a request made by Councilmember Bernard Parks to rename Saint Andrews Recreation Center. Lastly, she reported that a discussion took place relative to the Daughters of American Revolution's offer to install a plaque in Pan Pacific Park.

#### GENERAL MANAGER'S ORAL REPORT

Michael Shull, General Manager, reported on Department activities.

#### FUTURE AGENDA ITEMS

There was no request for future items.

#### PUBLIC COMMENTS

Public comment was invited. One request for public comment was received and such comment was made to the Commission.

April 2, 2014

NEXT MEETING

The next scheduled meeting of the Board of Recreation and Park Commissioners was scheduled to be held on Monday, April 14, 2014 at 9:30 a.m., at Northridge Recreation Center, 18300 Lemarsh Street, Northridge, CA 91324.

ADJOURNMENT

There being no further business to come before the Board, the meeting adjourned at 1:35 p.m.

ATTEST

  
\_\_\_\_\_  
PRESIDENT

  
\_\_\_\_\_  
BOARD SECRETARY

**EXHIBIT C**



**Friends of Griffith Park**  
P.O. Box 27573  
Los Angeles, CA 90027-0573  
friendsofgriffithpark.org

January 10, 2013

Ms. Cathie Santo Domingo  
Bureau of Engineering, RCFP  
1149 S Broadway, Ste 860  
Los Angeles, CA 90015

**RE: Prop K L.A. for Kids Proposals for Two New Baseball Fields in Griffith Park**

Dear Ms. Santo Domingo,

Friends of Griffith Park has expressed its support to the Bureau of Engineering and the Department of Recreation and Parks for *Option 3: Griffith Park North Atwater Location* for two new Prop K funded baseball fields. We believe that this option fulfills the project's stated goals while creating the fewest significant impacts on recreational users and the environment. In our view, it is the only viable project proposal that has been presented to the public so far and the only proposal that meets the goals of Prop K.

The subject of this letter is the negative recreational and environmental impacts of proposed *Option 1: North East Corner of the Crystal Springs Picnic Area* that was preferred 4-3 by the LVNOC in (Month) 2012. In arriving at our conclusion to oppose this choice, we have taken into consideration the needs of all affected Crystal Springs user-groups and the Crystal Springs environment itself.

**Potential CEQA Impacts of Option 1**  
**1. Recreational Resources**

Option 1 creates a core change in use and users and a net loss in the quantity and quality of established recreational usage at the Crystal Springs site.

Besides its availability for "walk-up" picnics, the Crystal Springs picnic facility is the only facility in Griffith Park available on a "by-reservation" basis. It is heavily used by extended families and affinity groups to celebrate milestones, quinceaneras, annual picnics, reunions, and other special occasions. Under the proposed plan, one of the family picnic pads must be eliminated because it is within the footprint of the proposed project. However, three other pads would also be severely impacted because of their extreme proximity to the fence, dugout and bleachers of the proposed west field. A total of 375 potential "by-reservation" family picnickers would be affected, as one eliminated picnic pad accommodates 75 people, and the other three pads accommodate 100 each.

Crystal Springs is also the only picnic facility in Griffith Park available for large outdoor special events, including youth, school and cultural fairs and festivals that attract up to 1000

persons or more. Option 1 would severely disable, if not end, Crystal Spring's ability to function as a facility for large group picnics and outdoor special events.

Because it requires a taking of, and significant reduction in, the physical area and user-capacity of the site's picnic facilities, it evicts a large quantity of established recreationists. At the same time, Option 1 reduces the overall quality of the existing recreational experience, even in those vestiges of the site not proposed for demolition, due to the requisite enclosure of open space, removal of trees, and resultant compression and marginalization of established uses and users.

Loss of essential space. Space is the essential prerequisite of a picnic facility. The Crystal Springs facility offers adequate space for group and individual picnicking, related forms of play, and other types of passive recreation and relaxation. The notion that reducing the space devoted to these established purposes can be offset by crowding the facility's picnic tables together more densely indicates a lack of understanding of the Crystal Springs facility's core uses and users. No one would consider reducing the playing area of a youth baseball field in order to build a picnic facility within its footprint.

Loss of shade, increase in temperature. Recreation at Crystal Springs is enabled and enhanced by mature trees that shade and cool the site. The removal of 44 trees would raise temperatures and expose the site to open sun, impairing its continued function as a desirable facility for picnicking and passive relaxation.

Increase in noise. Crystal Springs' mature trees also serve as acoustical barriers to the nearby 5-Golden State Freeway. Their removal would increase ambient sound to the detriment of picnickers, passive recreationists and other users of the site. Option 1 also includes the installation of two public address systems which will introduce unwanted noise. The addition of permanent, amplified sound to the site will disturb the peace of its picnickers and passive recreationists, golfers using the adjacent course, and equestrians and hikers on the trail paralleling the ball fields. All will be disturbed additionally by the sharp crack of balls hitting bats and sporadic shouts and cheers from the bleachers. In the case of equestrians, these sudden noises will also pose safety issues: horses are highly sensitive to unexpected sounds which can cause them to bolt.

Loss of recreational options. Option 1 will evict established picnickers and passive recreationists, restrict their options for outdoor games and free play, and compress and marginalize remaining users. It will also negatively impact bicycling by children at this site. Griffith Park offers experienced cyclists paved roads shared with auto traffic and paved mountain roads closed to automobiles. Crystal Springs offers a third, child-friendly option: a flat, paved loop around its picnic facilities far enough removed from general park traffic to be suitable for children. The Bike Rental Concession at Crystal Springs rents bicycles for children and youth, pedal go-karts, and pedal surries for families that can be operated safely on this road, usually as a companion activity to picnicking. Option 1 displaces these recreationists by eliminating this loop.

Aesthetic concerns. The Crystal Springs picnic facility is a valuable scenic resource in and of itself for people seeking a retreat from the city. Its visual character will be significantly damaged by the loss of 44 trees. The quality of views from the grounds themselves will be compromised, as will the views of the facility from Crystal Springs Drive. Under Option 1,



the views of trees and treetops will be replaced by a vista of barren ground, barrier fencing and corporate banners.

## **2. Biological Resources**

Because of biological adaptation, Crystal Springs plays an unexpected, but critical, role in the health and survival of Griffith Park wildlife. The area sustains native mammals and birds, and facilitates their safe movement along the Park's eastern edge, and to and from the Los Angeles River paralleling the site. Wild species nest, burrow, hunt and graze on Crystal Springs picnic grounds whose unimpeded open nature, vegetation including protected native trees, and relative nighttime darkness will be sacrificed by Option 1, to the impairment of this natural resource.

Removal of trees. The removal of 44 trees reduces the canopy, biomass, and ecological integrity of Crystal Springs, an area that is of ecological importance to the Cooper's hawks, red-tailed hawks, common poor-will, woodpeckers, owls, egrets, great blue herons, squirrels, rabbits, coyotes and mule deer and other species that are seen there. These species have incorporated the site into their habitat and are sustained by, and dependent on, its continuance as a friendly environment. With the proposed reduction in vegetative resources, a reduction in fauna will follow. Especially impacted will be nesting sites in the upper tree canopy that will be removed with the trees.

In 2006, the City of Los Angeles passed the Protected Tree Ordinance, which designates indigenous coast live oaks and western sycamores as protected species. Option 1 mandates the removal of many Crystal Springs sycamores and oaks, all protected under the code. It will also necessitate the removal of a centerpiece tree – a venerable native sycamore that has been designated by the City as a "Heritage Tree" and is a living artifact of Los Angeles and Griffith Park history. This giant in the landscape likely pre-dates the Crystal Springs picnic facility itself; horticultural testing may tell if it pre-dates the Park itself.

Wildlife connectivity. Option 1 mandates the introduction and installation of some 1400 linear feet of barrier fencing, (4 to 20 feet in height), to prevent Crystal Springs recreationists and users of the adjacent trail from being hit by stray balls, as well as to secure the ball fields themselves from outside use.

In the eastern part of Griffith Park, several man-made barriers already exist that frustrate the movement of native species, and prevent them from reaching the Los Angeles River. Option 1 adds another. It significantly narrows the available space within which mammals can travel safely—both within the Park, and to and from the equestrian tunnel next to the Crystal Springs picnic facility, an important connector to the river.

Wildlife planning considerations. The Planning Department of the County of Los Angeles lists Griffith Park as a Significant Ecological Area (SEA). Due to sightings of rare species that have occurred, the Park is also listed with the California Natural Diversity Database, signifying that impacts on rare species, as well as loss of the habitat which may support them, and should be a planning consideration. Additionally, the Griffith Park segment of the Los Angeles River paralleling and connecting to Crystal Springs, is one of nine focus areas in the Congressionally funded Army Corps of Engineers *Los Angeles River Ecosystem Feasibility Study*. A major objective of the Study is to establish habitat connectivity. The river reach at Crystal Springs was one of nine chosen for its greatest potential for ecosystem restoration. It

is comment on the environmental significance of Griffith Park, that of the nine reaches of the Los Angeles River being studied by the Army Corps, four of them are located in Griffith Park.

Wildland fires. To minimize the risk of brush fires, barbeque equipment and fires are prohibited in Griffith Park, unless provided by the City in designated perimeter areas. The Crystal Springs picnic facility is one of a handful of places in Griffith Park where outdoor cooking is permitted. Barbeque grills and fire-safe hot coal disposal bins are provided for this purpose. By reducing opportunities for safe grilling at Crystal Springs, Option 1 may lead to unsafe grilling by displaced picnickers in fire risk areas.

Nighttime illumination. Artificial lighting deters the hunting, mating and migration behaviors of Griffith Park's nocturnal animals, including nighttime feeders like owls, raccoons, coyotes, skunks and bats. The increase in nighttime illumination that will accompany Option 1 will significantly impact wildlife.

Dust. If dirt infields are not properly and continuously maintained, the dust that will result can coat trees and plants to the detriment of passive users, wildlife and the vegetation itself.

Safe watershed. The initial rendering of the ballfields avoids probable parking impacts, such as accommodating parking demand at peak game times, or additional parking space requirements which may be imposed based upon bench-seat count. If additional parking is mandated, loss of water permeability and watershed issues must be addressed per the Clean Water Act and Federal, State and County agencies.

### 3. Historic Resources

By unanimous vote of the Los Angeles City Council, in January of 2009, Griffith Park was designated in its entirety as City of Los Angeles Historic-Cultural Monument #942. Its benefactor, Colonel Griffith J. Griffith, was an immigrant who was born into poverty. He envisioned that the Park he endowed would be "*a place of rest and relaxation,*" and "*a resort for the rank and file of the plain people.*" In 1910, the Colonel wrote:

*Public parks are a safety valve of great cities and should be accessible and attractive, where neither race, creed or color should be excluded... Give nature a chance to do her good work and nature will give every person a greater opportunity in health, strength and mental power."*

The Crystal Springs picnic facility is one of the best surviving exemplars of Colonel Griffith's vision for the Park. As the Colonel intended, it is available to every race, creed and color—and is enjoyed particularly by working class and immigrant youth and their families as a retreat from the congested metropolis. Prop K funding for two new ballfields in Griffith Park is not a grandfathered project and is, therefore, a candidate for historic evaluation and review.

Picnicking, a historically significant activity. Picnicking is one of the three earliest forms of recreation in Griffith Park, (hiking and horseback riding are the others). Photographs dating from the earliest years of the 20th century show parties in heavy Victorian dress picnicking under the Park's sycamores.

The Crystal Springs picnic facility was developed in 1936, after the Civilian Conservation Corps (CCC) dismantled their live-in camp there. In 1935, Camp Griffith Park was visited by President Franklin Roosevelt and First Lady Eleanor to dedicate the sculpture, "The Spirit of the CCC," a WPA Arts Project, a reproduction of which is now in Travel Town. Since that time, generations of families have made Crystal Springs their headquarters for family picnics and celebrations.

Historic losses and rebuilding of baseball fields. Contrary to the assertion that the Option 1 replaces ballfields that were lost at Crystal Springs, there is no record of ballfields in this area until the existing Crystal Springs baseball facility, Pote Field, was built in the late 1950s. The 1935 Master Plan for Griffith Park shows two ballfields near the municipal plunge at the Griffith Park Rec Center at Los Feliz and Riverside Drive. These fields were demolished by the construction of the 5-Golden State Freeway in 1957. Some believe that Pote Field and the youth baseball/softball field currently in Griffith Park's North Atwater area were built to compensate for the loss of the Rec Center fields, but there are no records on this point. Rather than ballfields at Griffith Park Rec Center, there are presently two newer soccer fields there in addition to the tennis courts which existed prior to the freeway and were not affected by its construction.

Records do show that some 260 acres of Griffith Park (1/5 of the Park's flat land) were lost to 5-Golden State Freeway construction, including a significant portion of Crystal Springs picnic area which was previously a much larger facility. The land lost to picnicking was not restored. In fact, a portion of Crystal Springs's picnic area that did survive was used for the development of Pote Field.

Historic loss of picnic area. Over the years, the amount of informal and developed picnic area in Griffith Park that has been demolished to make way for facility development has been considerable. In 1957 260 acres of flat—much of it space for picnicking and free play---were lost to the freeway; in 1958, Toyon Canyon's 40-acres were lost to a landfill; in 1988 the Pine Meadows picnic area's 11 acres were turned over to the Autry Museum for \$1 a year; in 1997, the Greater Los Angeles Zoo carved out 9-acres of the historic Mineral Wells picnic area, for its new animal health center (the Zoo wanted to take all of the picnic area, but activists fought back and limited the taking). Records fail to pinpoint the moment when Vermont Canyon's developed picnic areas, created in the 1910's, were displaced by stacked parking for the Greek, but that is the norm. Baseball fields come and go in Griffith Park, but Griffith Park's picnicking acreage simply disappears without replacement.

Trees as historic resources. Native trees are important historic resources throughout the Park. Option 1 seeks to remove a number of native sycamore and oaks, including a giant specimen at Crystal Springs that been designated by the City as a "Heritage Tree" and is a living, breathing part of the Park's historic fabric. This tree may pre-date the Crystal Springs picnic facility; horticultural testing should be undertaken to determine its exact age, for it may pre-date the Park itself.

The Anza National Historic Trail. The City of Los Angeles' only certified section of the Juan Bautista de Anza National Historic Trail defines the eastern edge of the Crystal Springs picnic facility. This trail is heavily used by hikers, runners, equestrians, and picnicking families out for a stroll. It is one link in a 1200 mile historic trail being assembled by the National Park Service (NPS) that when completed, will stretch from Nogales, Arizona to the Presidio in San Francisco. The trail will celebrate the exploits of the Anza Expedition which

opened California to Spanish colonization in 1775-6, and led to the founding of Los Angeles in 1781.

An important NPS recreational goal is to expose trail users to the landscapes and natural features that were seen by expedition members. Currently there are outstanding views of Griffith Park's natural canopy and rugged, western hills from the trail adjacent to Crystal Springs. Option 1 would change this to views of barren fields with chain link fencing hung with corporate banners. This will have a damaging effect on the Trail and on Griffith Park's historic fabric: Crystal Springs is the site of the historic Feliz Adobe, the former ranchhouse of Jose Vicente Feliz which is a City landmark in and of itself. Feliz was a military escort to the Anza Expedition, one of the founders of Los Angeles and owner of Rancho Los Feliz, which ultimately became Griffith Park.

#### Option 1 Basic Eligibility Concerns

In addition to the impacts on recreational, biological and historical resources, we are concerned that Option 1 does not meet basic Prop K eligibility requirements. The *Proposition K – L.A. for Kids Request Steering Committee Request for Proposals (RFP)* states that:

*The primary purpose of funding allocated through this RFP will be to combat the inadequacies and decay of the City's infrastructure for youth, which has resulted in serious unmet needs for park, recreation, child-care and community facilities.*

Griffith Park's Crystal Springs picnic facility is a healthy, heavily-used facility offering recreation for youth and their families. Option 1's required demolition of, and negative impacts on, the Crystal Springs site will cause a significant reduction in the capacity of this facility and in doing so, *create an unmet need for group picnicking and outdoor event space.* This is the opposite of the intended effect.

The basic Eligibility Requirements listed on the *Proposition K – L.A. for Kids Request for Proposals Competitive Grant process* fact sheet include the stipulation that applicants must demonstrate that the proposed project will result in qualitative and/or quantitative **increase** in recreation services to our city's youth and the general population. Moreover, as a part of the competitive scoring process, the *Prop K-- L.A. for Kids Steering Committee Request for Proposals*, also requires applicants to respond to the Section II "Service Capability" and "Bonus Points Discussions" below:

#### 4. Service Capability

- iv. Estimate how many additional youth will be served with the proposed expanded services over the life of the capital improvement project.*
- v. Discuss how the proposed project will create or enhance the existing capacity of recreation and leisure facilities available to local youth and residents.*

The number of additional youth that will be served by two new ballfields at the Crystal Springs site over the life of the capital improvement project, cannot compensate for the attendant reduction in the number of youth served by the existing capital facility whose life will be cut short to make way for the project as proposed in Option 1. In addition to "by-reservation" family picnic usage affecting up to 375 picnickers daily, this picnicking facility will no longer be available for reservation-only special events, affecting 1000 or more users

for each event. Many of the special events are youth focused, including numerous school events. Also, within the footprint of the proposed ballfields, the current facility supports a high volume of walk-up blanket picnicking and passive leisure activities for a diversity of recreationists year-round and is open every day of the year. Besides these direct losses of recreational usage, the degradation in the quality of picnicking for the entirety of Crystal Springs picnic facility will further lower the usage by passive recreationists and picnickers.

In summary, the construction of the proposed project at the Crystal Springs site will decrease the site's existing recreational capacity resulting in a net loss of recreation available to youth. It will create, instead of resolve, an unmet need. Furthermore, the diversity of recreational users will be reduced as there is no reason to believe that the new ballfields will be open to the general population, whether by advance arrangement or on a walk-up basis. In all plans and materials specific to the proposed project, the facilities are described as "Little League Fields," which are leased to private operators and open only to qualified paying participants.

### 5. Bonus Points Discussions

#### *Project includes an at-risk youth component*

No. Conversion of the existing picnic facility at Crystal Springs into two new ballfields will reduce recreational services to the region's at-risk youth. The site's picnic facilities are heavily used by youth and their families, many of whom live in under-served neighborhoods lacking in trees, greenery and open space. Additionally, the Crystal Springs Group Picnic area is one of a handful of places in Griffith Park where outdoor grilling is permitted. Preparation of a meal on an outdoor setting is typically the centerpiece of family and group picnics for lower income recreationists, who do not have backyards in which they can enjoy this type of recreation.

#### *Project serves an area without similar services or facilities*

No. Because Griffith Park is a regional park, the assessment of recreational services and facilities must be considered on a regional basis. Currently, Griffith Park has more sports fields and courts than any other park in the Los Angeles system. There are presently two baseball fields in Griffith Park proper and within a short radius of the Park there are an additional 9 youth baseball fields for a total of 11.

- Griffith Park (2)
- Silver Lake Field of Dreams (1)
- Weddington Park (4)
- Taylor Yard (2)
- Pan Pacific Park (1)
- Bellevue Recreation Center (1)

By contrast, there is only one group picnic area in Griffith Park and within a short radius of the Park there are no others. The demolition and/or significant reduction in size in the Crystal Springs picnic facility will evict more recreationist than Option 1 will serve.

#### *Project demonstrates high cost-effectiveness*

No. Option 1 is not cost-effectiveness at all. It will require the demolition of a healthy and heavily used existing facility that has been enjoyed by generations of youth and their families and continues to serve these users. There is a long history of public investment in the Crystal Springs picnic facility. Formal picnic grounds have been maintained there since 1936 and

investment was made in renovations there for the 1984 Los Angeles Olympics. The reconstruction of this popular facility at another site, (were it possible to be found), would require considerable investment (could funding be found). The cost to duplicate the picnic area would be significant; the cost to install mature trees to shade the replacement area would be prohibitively expensive. Additionally, the by-reservation functions at Crystal Springs' provide needed revenue directly to the Recreation and Parks Department's Budget for its operations and youth programming. They will be greatly reduced, if not eliminated by Option 1, further calling into question the proposal's cost effectiveness.

In summary, we believe that Option 1 does not meet several Prop K Eligibility Requirements. Instead we are recommending Option 3, which conforms favorably to the basic goals of Proposition K and RFP stipulations.

### **Friends of Griffith Park**

Friends of Griffith Park is a grassroots 501(c) (3) non-profit organization. We advocate for the Griffith Park as a whole and for all its user groups and seek a balance of interests that will conserve and preserve the Park for future generations.

It is our understanding that *Option 1: North East Corner of Crystal Springs Picnic Area* is under consideration. The comments in this letter express our opposition to this option. If it is also under consideration, the concerns expressed herein also extend to *Option 2: South End of Crystal Springs Picnic Area*, a different configuration that creates similar impacts to the picnic facility.

Friends of Griffith Park reiterates its support for *Option 3: Griffith Park North Atwater Location* as the appropriate location for two new ballfields funded by Prop K. Additionally, there may be other possible locations within Griffith Park, not yet proposed, even better suited for new ballfields.

Respectfully,



Gerry Hans  
President

**EXHIBIT D**





**Friends of Griffith Park**  
P.O. Box 27573  
Los Angeles, CA 90027-0573  
friendsofgriffithpark.org

March 06, 2013

Ms. Maria Martin  
City of Los Angeles Bureau of Engineering  
Environmental Management Group  
1149 S. Broadway, 6th Floor, Mail Stop 939  
Los Angeles, CA 90015-2213

RE: Prop K Proposals for Two New Baseball Fields in Griffith Park  
(Letter #2)

Dear Ms. Martin,

This letter follows our comment letter dated Jan 10, 2013, regarding the Prop K ball fields in Griffith Park.

Our additional general comments:

1. Consider alternative locations, including Central Service Yard, Ferraro Fields, and Headworks. Study potential reconfigurations of these alternative sites, which may help make them more efficient for active recreational usage. In particular, study reconfiguration of Ferraro Fields.

2. While considering alternative locations, recognize that it is not necessary to position two ball fields next to each other. There is little that can be shared between two ball fields, so there is negligible operational benefit having them placed aside each other. In fact, many potential impacts may be lessened by placing them in relatively separate locations, such as parking/traffic impacts.

Our additional comments regarding the impacts at Crystal Spring picnicking facility:

1. To repeat a comment made during the Scoping Meeting on January 24, 2012, in the Environmental Screening Checklist, 4. Biological Resources, e) conflict with local policies, should be checked as "potentially significant impact."

2. According to the National Park Service, The Juan Bautista de Anza National Historic Trail segment within Griffith Park is the only certified section of this National Historic Trail within the entire Los Angeles area. This should afford it additional protection, per our previous comments. Historic-Cultural agencies and entities should be advised and consulted.



3. A special effort should be made to identify and quantify the user groups affected negatively by placing ball fields in Crystal Springs. User surveys should be undertaken to chronicle usage of the entire area which may be impacted. When this has been accomplished, outreach to these users should be initiated. So far, there have been insufficient postings and notifications, if any, in the Crystal Spring picnicking facility.

4. The foot print of the proposed site should be chalked out in order to give current users a true picture of the impacted area. Three-dimensional renderings of the ball fields within the setting, including all fencing, should be drawn in order to give a better sense of the impacts. These renderings should include typical scoreboards and sponsor banners on fencing.

5. Future impacts, beyond those resulting directly from the current pre-design plan, should not be segmented out of the EIR process. For example, additional parking space requirements may present impacts on their own merit (the taking of more open space), above and beyond the impacts caused by the project as described.

Sincerely,

A handwritten signature in black ink, appearing to read "Gerry Hans", with a long horizontal flourish extending to the right.

Gerry Hans  
President

**EXHIBIT E**

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December 17, 2013

*Via U.S. Mail and email [Maria.Martin@lacity.org](mailto:Maria.Martin@lacity.org)*

Ms. Maria Martin  
City of Los Angeles Bureau of Engineering  
Environmental Management Group  
1149 S. Broadway, 6th Floor, Mail Stop 939  
Los Angeles, CA 90015-2213

Re: SCH No. 2013011012  
Draft EIR Comments on Griffith Park Crystal Springs New Baseball Fields  
Proposition K

Dear Ms. Martin:

We submit these comments on behalf of Friends of Griffith Park (FoGP). Friends of Griffith Park is a non-profit charitable group that promotes the enlightened stewardship of Griffith Park so it can survive and thrive in the 21st Century. For this reason, FoGP has been active and interested in the City's process to determine a suitable location (or locations) for the two new ball fields proposed for Griffith Park ("Project"). As currently proposed, the Project would locate two new youth baseball fields on approximately four acres in the Crystal Springs picnic area of Griffith Park. The existing loop road would be converted to have two cul-de-sacs. The Project would require the removal of thirty-three trees and the relocation of twelve trees. Just as important, the Project would require the relocation of seven picnic tables that currently comprise one of the only large group picnic areas in Griffith Park. While the picnic tables themselves would be retained, they would be placed in a much smaller area, thereby constraining the size of the groups that they may serve and likely ending the ability to have reserved group picnics. (Department of Recreation and Parks presentation, LVNOC Meeting #2, February 27, 2012.) Since picnicking is a low-cost recreational activity available to all Los Angeles families, the loss of these group picnic areas will have significant impacts on Griffith Park and its ability to provide recreational opportunities. Accordingly, FoGP respectfully requests that the City carefully consider replacement of these picnic areas with ball fields that may not be available for free public use.

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The California Environmental Quality Act (CEQA) is intended to produce an EIR that adequately informs the public and decision makers about the potential environmental impacts of a project and to provide alternatives and mitigation to lessen or eliminate those impacts. (CEQA Guidelines § 15002; *Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal. 3d 553, 564; *Laurel Heights Improvement Ass'n of San Francisco v. Regents of the University of California* (1988) 47 Cal.3d 376, 392.) The DEIR prepared for the Griffith Park Crystal Springs New Baseball Fields Project contains numerous deficiencies that prevent it from complying with CEQA. The DEIR fails as an informational document, it is based upon premises that are contradicted by evidence in the record, and it fails to address the concerns and alternatives submitted by FoGP during the scoping period. The DEIR recognizes that significant impacts will occur, but fails to explore the significance of those impacts, to develop a full range of effective mitigation measures, or to adequately analyze alternatives to the Project avoid or lessen impacts, as required by law. The DEIR must be substantially revised before the Project may be approved by the City.

**I. The EIR's Alternatives Analysis is Inadequate.**

CEQA mandates that a public agencies, "not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects." (Public Resources Code § 21002.) Accordingly, the alternatives analysis is the "core of the EIR." (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553, 564.) "One of [an EIR's] major functions . . . is to ensure that *all reasonable alternatives* to proposed projects are thoroughly assessed by the responsible official." (*Laurel Heights Improvement Ass'n. v. Regents of the University of California* (1988) 47 Cal. 3d 376, 400.) Further, "Under CEQA, the public agency bears the burden of *affirmatively demonstrating* that...the agency's approval of the proposed project followed meaningful consideration of alternatives and mitigation measures." (*Mountain Lion Foundation v. Fish and Game Commission* (1997) 16 Cal.4th 105, 134.)

**A. The DEIR Ignored Feasible Alternatives Suggested During the Scoping Process.**

By failing to thoroughly assess all reasonable alternatives to the proposed Project that were put forth during the scoping process, the City has failed to comply with CEQA.

The DEIR correctly states that Section 15126.6 of the CEQA Guidelines requires that an EIR should discuss a range of reasonable alternatives to the proposed project, but that it need not consider alternatives that are infeasible. Although the DEIR chose to discuss five allegedly feasible alternatives, it ignored completely those alternatives that presented the best opportunities to "avoid or substantially lessen" environmental impacts and best fit the objectives and spirit of the project. Of those alternatives the DEIR "considered and found infeasible," most were red herrings that would never have been implemented for various reasons: Carpenter Community Charter School, Toyon Canyon Landfill, and Commonwealth Nursery. Alternative 1b should not be considered an alternative since it is merely a different layout at the same Crystal Springs Picnic Facility location. Much better alternatives which were also suggested during the scoping period (and even earlier) were intentionally and completely ignored. These alternatives are discussed below.

1. Alternative Placement: During the scoping period, it was suggested that the two new ball fields did not necessarily need to be adjacent to each other. The Project and its Objectives call for new ball fields, not one new sports complex comprising two ball fields. This was not considered, discussed or analyzed in the DEIR. This alternative configuration has great potential to reduce the negative environmental impacts to already-crowded venues within Griffith Park. It also has the potential to fit within the existing infrastructure of the park, such that new rest rooms and parking spaces, for example, present less challenge and expense.

By placing ball fields in two distinct locations rather than adjacent, accessibility of these ball fields to two different communities is possible. There is significant value in having recreational facilities in close proximity to the residential areas in need of them, without the requirement of transportation via parents of the 6 to 12 year olds targeted by the Project. Having one enhanced field at North Atwater location, for example, could help serve the needs of that residential area. Also, locating one ball field at the North Atwater location, rather than two, would eliminate the single significant impact (noise) which would occur if two ball fields located there under the North Atwater Alternative, according to the DEIR noise analysis.

The DEIR fails totally to analyze the split-field alternative in relationship to reduction of adverse impacts and in relationship to fulfillment of the project objectives. The DEIR must be revised to analyze the inherently feasible alternative of locating the two Project ball fields in different locations, with reduced environmental impacts at each.

2. Central Service Yard (CSY): This previously suggested alternative was not considered at all in the DEIR. Yet, it is the most highly-studied venue for active sports of all alternatives under consideration by the City. City Project, a non-profit environmental justice organization, initiated a conceptual design project for the area as LA's "next great urban park." Of course full implementation of City Project's entire proposal would be costly and prohibitive. However, the current Prop K funding creates an opportunity to begin transforming at least a portion of this property to park recreational usage.

(See, KCET Departures

[http://www.kcet.org/socal/departures/landofsunshine/ACE\\_LAR\\_comments\\_20131118\\_updated2.pdf](http://www.kcet.org/socal/departures/landofsunshine/ACE_LAR_comments_20131118_updated2.pdf) ; CITY PROJECT CSY

<http://www.kcet.org/socal/departures/columns/2011%20GPEBLAR%20Final%20Conceptual%20Plan%2020120713%20BD%20.pdf>.)

CSY is a large complex of buildings, parking lots, and outdoor storage yards adjacent to the LA River on its east bank. It is currently occupied by multiple City departments. CSY is also dedicated park land and should not be used for non-parkland business. (City Charter, Sec. 594 Control and Management of Recreation and Park Lands. (c) Restrictions on Transfer of Dedicated Parks ["All lands heretofore or hereafter set apart or dedicated as a public park shall forever remain to the use of the public inviolate..."].) Without demolishing any buildings, the acreage for two ball fields could be easily configured onto this 28-acre City property by utilizing some of the storage yard area. Thus, CSY is a feasible alternative that must be analyzed in a revised DEIR.

3. Ferraro Fields: Yet another suggested alternative location was not considered at all in the DEIR. Ferraro Fields is already an active sports complex, and would therefore eliminate environmental challenges apparent at the Crystal Springs location. The Ferraro Fields property is nearly 30 acres and is comprised of seven soccer fields, parking lot, a shady picnic area with playground, a large un-landscaped area, and an off-leash dog park facility. A road currently encircles the area, providing ample additional parking capacity. At least one ball field could be built at this area without sacrificing soccer fields. With a reconfiguration, it may be possible to build two fields but may require relocating the dog park and/or realigning the road.

Design concepts and detailed analysis for all three of the above alternatives should be a part of a revised DEIR.

**B. The EIR's Alternatives Analysis Failed to Accurately Analyze the Comparative Environmental Impacts of Alternative Sites.**

**1. Aesthetics**

The DEIR correctly states that at both Crystal Springs locations, the "Aesthetics impact after mitigation would be significant." The DEIR fails, however, to analyze the full extent of the recreational activities these aesthetical changes will impact. The character of Griffith Park as an urban wilderness is largely defined by its native habitat. "Urban Wilderness Identity", per the Griffith Park Vision Plan, applies to all of Griffith Park. Far more value should be placed on retaining native species trees, both from a biological resource perspective and for aesthetical context. Large native "protected" trees will need to be removed at both Crystal Springs sites. (Griffith Park Vision Plan, Executive Summary:

<http://laparks.org/planning/pdf/GPvisionplan.pdf>; Protected Tree Ordinance (2006):  
[http://cityplanning.lacity.org/Code Studies/Other/ProtectedTreeOrd.pdf](http://cityplanning.lacity.org/Code%20Studies/Other/ProtectedTreeOrd.pdf).)

The DEIR also fails to anticipate the much-increased future usage of the Crystal Springs area's adjacent trails. Increase in usage will result from the recently approved La Kretz Bridge over the Los Angeles River which will deliver new, higher levels of equestrians, runners and hikers to the area. Future improvements to the Juan Bautista de Anza National Historic Trail in Griffith Park (National Park Service), currently in conceptual design and planning phase, will also produce increased numbers of users. Higher usage, in turn, presents an even higher level of aesthetics impact which was not considered by the DEIR.

(Attachment #3: Griffith Park Anza Trail brochure, and Attachment #4: National Park Service support letter)

**2. Biological Resources**

The DEIR correctly states that at both Crystal Springs locations, the "Biological Resources impact after mitigation would be significant." The DEIR fails, however, to analyze the full extent of the impact and is therefore inadequate.

The Los Angeles River Revitalization Master Plan (LRRMP) is cited with a reference to enhancing the biological resources lost when the river was re-engineered in the 1930s. (DEIR p. 3, 2-6.) However, the DEIR does not attempt to analyze the importance Crystal Springs area has to wildlife connectivity, via the adjacent tunnel to the Los Angeles River or otherwise. The Griffith Park Wildlife Connectivity Survey has

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continued since summer 2011 and is neither referenced nor consulted. The nearby tunnel is one of only two viable park corridors to cross I-5, allowing good connectivity to the river for wildlife. Alternatives sites do not create this significant impact. Even so, the DEIR finds, without support, "There are no migratory wildlife corridors for wildlife within the project site.." (DEIR pp. 3, 4-19.) How is this claim substantiated? The DEIR's failure to discuss the potential loss of habitat connectivity and wildlife corridors, an impact that affects only the Crystal Springs locations, is a failure to disclose that violates CEQA. The DEIR must be revised to analyze the Project's potential impacts on wildlife corridors and habitat connectivity.

The loss of trees at Crystal Springs is discussed in the DEIR. However, there is inadequate analysis of the wildlife supported by the trees. No nesting surveys were done to identify nesting birds, migratory or otherwise. Only anecdotal observations were made during a brief visit on one hot summer day, outside the main nesting season. Additionally, some valuable bird species known to inhabit the Crystal Springs location are not mentioned at all in the DEIR. Omitted species include redbelt hawk, common poorwill, great blue heron, and western bluebird.

Due to the inadequate disclosure and analysis of biological resources located onsite, the DEIR's mitigation measures for biological impacts are inadequate. Without an adequate analysis, the likely adverse biological impacts on Griffith Park and the Santa Monica Mountains cannot be mitigated.

Light spillage from the Crystal Springs site also affects the Project's adverse impacts on wildlife. Decades of scientific research has established that artificial nighttime lighting interferes with wildlife and habitat value. The introduction of nighttime lighting can interfere with predator-prey relationships, affect bird nesting behavior, as well as circadian and annual rhythms affecting wildlife behavior. The DEIR also fails to adequately consider the disruption to wildlife that would result from lighting two ball fields at Crystal Springs, in violation of CEQA. (See, *The Ecological Consequences of Artificial Night Lighting*, Travis Longcore and Catherine Rich, 2006.)

Finally, FoGP notes that the DEIR confuses the City of Los Angeles Protected Tree Ordinance (2006) and the Department of Recreation and Parks Tree Preservation Policy.

1. Errata: The City ordinance is incorrectly called "Tree Preservation Ordinance" multiple times in the DEIR. A suitable name for the ordinance is "Protected Tree Ordinance." The City has a list of special native species, called "protected trees,"



which need to be respected for fulfilling important native habitat functions. By misnaming the ordinance, the DEIR misrepresents and obscures the purposes for which these trees were protected.

2. **Errata:** The Department's policy statement on trees is incorrectly called "Tree Preservation Ordinance" on page 3 4-6, and should be "Tree Preservation Policy."

### 3. Noise

The noise-related "significant impact" noted for Alternative #2, North Atwater, is highly subjective due to the operation of the often-criticized metrics associated with noise. Ironically, the lower ambient noise level at Alternative #2 provides a more acceptable noise level for the recreational activity of youth baseball, given that numerous studies have shown that youth may be disproportionately impacted by high volumes and hearing loss.

The DEIR analysis also fails to take into consideration future sound mitigation programs which will likely be introduced at the Crystal Springs location. Sound mitigation measures will ultimately be accomplished at Crystal Springs with freeway barriers, berms, plantings, or combinations thereof. When this proposed sound mitigation is implemented to reduce traffic noise levels from I-5, the lower ambient level will then put Crystal Springs ballgame noise impacts on par with that expected at the North Atwater location. Thus, the basis for the City's conclusion that the Crystal Springs location is superior – the lesser noise impact – will be eliminated. CEQA analysis must include consideration of other relevant, probable future projects, such as the proposed noise reductions for I-5, the Anza Trail, and other Caltrans projects for the area. (Public Resources Code § 21083(b)(2).)

### 4. Recreational Resources

Since the purpose of Objective #2 is to create high quality, affordable recreational programming for at-risk youth, the DEIR should include a thorough analysis of the costs of ball team play to ensure that the Project will meet the Objective. Little League and similar league activities (with uniforms, equipment, coaching) may be out of reach for many families with at-risk children. (See, Big Price Tags Attached Even to Littlest Games, New York Times, [http://www.nytimes.com/2012/04/24/sports/big-price-tags-attached-to-even-the-littlest-leagues.html?\\_r=0](http://www.nytimes.com/2012/04/24/sports/big-price-tags-attached-to-even-the-littlest-leagues.html?_r=0); Youth Baseball Costs Soar on and off the Field, [http://www.huffingtonpost.com/2012/04/24/youth-sports-costs-soar\\_n\\_1448988.html](http://www.huffingtonpost.com/2012/04/24/youth-sports-costs-soar_n_1448988.html).) The DEIR should also analyze whether alternative sports with

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lower costs, such as soccer, might better fit the City's Objectives. A convincing argument must assert how the Project's ball fields will be available to at-risk youth.

Currently, at the Crystal Springs Picnic Facility, families with "at-risk" 6 to 12 year olds targeted by the City can recreate creatively at no cost. Many families have been doing so at Crystal Springs for three or four generations. An analysis by professionals with "environmental justice" expertise should also be performed to ascertain that policies that protect people on environmental justice grounds, including state law, are upheld with any project at this site. Finally, as previously referenced, privatization, in any way, of dedicated parkland at Griffith Park would violate City Charter, Section 594 (c).

#### **5. Transportation and Traffic**

The DEIR discusses traffic studies with meaningless results, while ignoring the obvious parking problem at the Crystal Springs location. On many warm days, all 265 of the site's parking spaces are taken. Cars must circle until another car leaves. This is the current state of affairs, even without the new parking demands of two simultaneous Little League games. Additionally, since teams must be prepared to take the field as soon as a previous game ends, the parking lot will need to accommodate parking generated by a minimum of four teams, in addition to the existing demand created by picnicking, Pote Field, and adjacent facilities. Thus, 120 additional spaces may be understating the ball field needs.

A thorough analysis of baseline parking by season, by weekdays, by weekend, and by time of day must be done. Only then can logical and informed decisions about the impacts to the area can be formed. At present, anecdotal reports by park rangers support the conclusion that this area is already at maximum capacity on warm days. The existing parking supply is insufficient to meet existing demands. The nearest alternative parking is at Merry-go-round Lot #1, a half-mile away, and is also often at capacity.

The DEIR also fails to include an analysis of the impacts and safety of the area for bicycle users, particularly young bicyclists, with regard to the proposed reconfiguration of the road to accommodate the Crystal Springs ball fields.

#### **6. The Table Summarizing the Alternatives Analysis is Unsubstantiated and Confusing.**

The DEIR attempts to tabulate its alternatives analysis into a single table, Table 4-2, located at DEIR page 4-39. This table presents a failed attempt to quantify relative

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impacts which are not quantifiable. Not all adverse impacts are of the same magnitude, as illustrated by a reference to significant impacts as "I" and lesser ones as "II." A false assumption is made giving equal weighting, plus or minus from the initial impact ranking, for the various impacts and various alternatives, skewing the results in favor of Alternative 1b. This table is not credible and should not be the basis for the conclusion which follows on the same page.

A more acceptable conclusion from this chart is that two significantly adverse impacts which are unavoidable ("I" level for both Biological and Aesthetics, per Table 4-2) are present at both Crystal Springs locations. At least one of the analyzed alternatives substantially lessens or avoids both of these impacts, and it is likely that the other feasible alternatives suggested by FoGP would avoid or lessen these impacts, as well. Therefore, other alternatives should be explored and analyzed in a revised DEIR.

## **II. The Project Fails to Satisfy Proposition K Requirements for Public Access.**

It is our understanding that Proposition K funds are not available for projects which are not accessible to the general public. Given that "youth fields" was later substituted for the original application's specification of fields for "Little League regulation baseball," it is important that ball fields placed into service via Prop K funding - regardless of location in Griffith Park - conform to Prop K guidelines. (Attachment #1, pp. 11-12, Prop. K Application.) The DEIR fails to prove that the Project will be accessible to the general public, either at the Project's opening or during the life of the ball fields. In practice, many Little League fields are not available for public use, or are available rarely due to their use by Little League participants. The Project must be revised to include conditions honoring Proposition K prerequisites for general public access.

The voter-supported intention of Prop K is to expand recreation in the City of Los Angeles. Ball fields would only bring new recreation to Griffith Park if the ball fields were located in a place where they truly brought new recreation, rather than "trading-off" lost picnickers for new ball players, as it would be the situation at Crystal Springs Picnic Facility. The DEIR fails to rationalize the purported increase in recreational opportunity provided by this taxpayer-provided Proposition K funding, given the detrimental impact the Project would have on recreational picnicking opportunities at Crystal Springs.

**III. Inadequate Public Notice Was Given to Affected Parties.**

The normal course of public notification of this Project – via City Hall, the internet, and of businesses and residences within the affected area’s perimeter – do not suffice as adequate notification for this Project. In this situation, where a treasured city-wide resource is potentially impacted, the City should have notified the most affected party - the picnickers - as a first priority. This was suggested in writing during the scoping period, but not heeded. Specifically, in order to reach members of the public that utilize the Project area, notices with a map depicting the proposed Project location should have been posted at the Crystal Springs Picnic Area itself. Secondly, since a database exists of all group picnic “use-fee” patrons (organizations, churches, families, and corporations), many which are regular group picnickers, the Department of Recreation and Parks should have been directed to send notifications to them. CEQA’s vitality is derived from public participation. (*Ocean View Estates Homeowners Assn v. Montecito Water District* (2004) 116 Cal.App.4th 396, 400.) Going forward, FoGP requests that the City post notices at Crystal Springs and mail notices to groups contained within the database.

**IV. The Project Objectives are Flawed and May Not be Satisfied by the Project.**

A Project’s objectives are important because they shape the Project and are the metric by which Project alternatives are measured. Thus, flaws in the Project Objectives will extend to all parts of the environmental analysis.

Objective #1, “Restore baseball/softball fields to Griffith Park Crystal Springs that served the area prior to the construction of the I-5 freeway,” is flawed since there is no evidence that any ball fields ever previously existed at the Crystal Springs location except for the current Pote Field. (DEIR p. 2-17.) Two ball fields did exist at a different location more than one mile away, and this was over 55 years ago. Thus, as written, Objective #1 appears to be improperly biased toward the Crystal Springs location for the fields. Previous efforts to dispel this misinformation went unacknowledged in the DEIR. In addition, use of unduly narrow project objectives violates CEQA (*In Re Bay Delta Coordinated Environmental Impact Report Proceedings* (2008) 43 Cal. 4th 1143, 1166 [“a lead agency may not give a project’s purpose an artificially narrow definition”].)

DEIR Objective #2 is to “Increase access to high quality, affordable recreational programs for youths in the area, especially at-risk boys and girls ranging from 6 to 12

Ms. Maria Martin  
City of Los Angeles Bureau of Engineering  
December 17, 2013  
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years of age.” (DEIR p. 2-17.) Yet “At-risk” is never defined in the DEIR. In most instances, the most at-risk youth include a higher age group. Moreover, the DEIR contains little substantiation that the Crystal Springs location is better suited to fulfill the “at-risk” objective than other possible Project locations. Current demographics support the conclusion that other locations may be more conducive to satisfying this Project Objective. The FEIR must contain supportable Project Objectives that are less narrowly-tailored toward the Crystal Springs site.

**V. The City Appears to Have Unlawfully Precommitted to the Crystal Springs Location.**

The Proposition K process and especially the Local Volunteer Neighborhood Committee (LVNOC) were predestined to name Crystal Springs Picnic Grounds as the favored location. This was, in part, the result of committee appointments made without regard for fair representation of the local community. FoGP requests a review of the appointments in relationship to demographics, fair representation and any LVNOC Committee member self-interests in the revised DEIR. Despite the significant environmental impacts that the Project would impose upon the Crystal Springs location, the CEQA process has been predisposed to this site. For example, a Task Order Solicitation (TOS) issued by City Bureau of Engineering Department on October 2, 2013, requests designs for only the Crystal Springs Project location, even though the DEIR and accompanying analysis determining the City’s preferred alternative had not yet been completed. (Attachment #4: Task Order Solicitation, dated October 2, 2013.) This demonstrates a precommitment to the proposed project in violation of California Supreme Court decision in *Save Tara v. City of West Hollywood* (2007) 45 Cal.4th 116. An agency “must not ‘take any action’ that significantly furthers a project ‘in a manner that forecloses alternatives or mitigation measures that would ordinarily be part of CEQA review of that public project.’” (*Id.* at 138, citations omitted.) As one court stated:

The CEQA process is intended to be a careful examination, fully open to the public, of the environmental consequences of a given project, covering the entire project, from start to finish. This examination is intended to provide the fullest information reasonably available upon which the decision makers and the public they serve can rely in determining whether or not to start the project at all, not merely to decide whether to finish it. The EIR is intended to furnish both the road map and the environmental price tag for a project, so that the decision maker and the public both know, before the journey begins, just where the journey will lead, and how much

they-and the environment-will have to give up in order to take that journey.

*(Natural Resources Defense Council v. City of Los Angeles (2002) 103 Cal.App.4th 268, 271.)* By precommitting to the Crystal Springs location, the City appears to have foreclosed true consideration of the alternative locations discussed in the DEIR, without any public disclosure or participation.

## **VI. The DEIR Fails as an Informational Document.**

As an informational document, this DEIR fails to provide sufficient detail to enable adequate analysis of the Project's impacts and benefits. The following are examples of information which is missing:

- Who will use the fields?
- What hours will the fields be available for free use on a "walk-up" basis?
- Will they be available without reservations at specified times?
- What geographic areas will they serve and how will this be ascertained?
- How will the targeted "at-risk" boys and girls be accommodated?
- Will there be equal access to girls who may want to play softball rather than baseball?
- How will the Department manage and maintain these fields?
- What is the data on ball fields within the local area and does the data support ball fields over soccer fields in relationship to the project objective #2, "at-risk" youth?
- Will the ball fields be available to teen age group, which generally are considered more "at-risk" than 6-12 age group?
- What are the statistics of "at-risk" youth on Los Feliz side of LA River vs. east bank LA River areas?
- How many residents will the ball fields serve and what is the per capita dollar investment ?

The responses to these questions are relevant to a thorough analysis of the Project's potential environmental impacts as well as a reasoned assessment of its community benefits. Since the Project will have at least one significant and unavoidable environmental impact, a Statement of Overriding Considerations will have to be prepared before the City may approve the Baseball Fields Project. This information will be required to provide substantial evidence in support of such a Statement of Overriding Considerations.

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Friends of Griffith Park respectfully requests that the City revise the DEIR prepared for this Project to include reasoned analysis of the additional, feasible alternatives suggested in this letter and in FoGP's previous correspondence with the City. A thorough analysis of alternative configurations and locations that will actually avoid or substantially lessen the potential impacts of placing new ball fields in Griffith Park is required – not only to comply with CEQA, but to protect the integrity of the City's largest park. Thank you for your consideration of these comments. Friends of Griffith Park looks forward to the City's release of a revised DEIR for this Project and to participating in the FEIR process.

Sincerely,



Doug Carstens  
Michelle N. Black

**ATTACHMENTS:**

1. Prop K Application, pages 11-12
2. Griffith Park Anza Trail brochure
3. National Park Service Anza Trail support letter
4. Task Order Solicitation, BOE, of October 2, 2013

**ATTACHMENT 1**



V.

1) **PROJECT DESCRIPTION AND MANAGEMENT (25 points: 3 pages maximum)**

- a. Provide a complete description of the proposed capital improvement and/or acquisition of land for parks, recreational, or open-space purposes project. Proposers may propose projects that construct and improve recreation facilities, renovate, improve and expand existing facilities, and site preparation. The project description should discuss the project's design, location, style, type, and approximate size.

The Department of Recreation and Parks (Department) requests \$500,000, under project category Athletic Fields for the proposed project to construct new ball fields at the Crystal Springs (Griffith Park).

The Griffith Park Crystal Springs Picnic Area New Baseball Field Project, located at 4730 Crystal Springs Drive, Los Angeles, CA 90027 (Census Tract No. 1802), consists of the design and construction of Twin Little League Regulation- Sized Baseball Fields with associated irrigation and landscaping features in a 4.0-acre portion of the Griffith Park Crystal Springs Picnic Area. The location of this 150,000-square foot project within the 4.0-acre picnic area footprint is consistent with Griffith Park facility planning guidelines that call for new projects such as this one to be sited within already- developed areas. This action preserves the Park's status as the nation's largest municipal park with an Urban Wilderness Identity.

The Project is specifically designed to increase opportunities for youth and, especially, at-risk boys and girls ranging in age from 6- to 12-years of age to learn how to play Little League regulation baseball. The City will establish its highly-rated Baseball Instructional programs that are expressly designed to address the needs of at-risk youth who need positive team-play learning opportunities to develop into responsible adults. It is expected that local interest would be such that adults will gladly sponsor a Little League Program including tournament play opportunities with other City-sponsored Little League teams.

The Picnic Area is situated on the extreme eastern side of the Park just west of the I-5 Freeway, immediately east of the Ranger Station and Visitors Center, and due south of the twin 18-hole Wilson and Harding Golf Courses. The Picnic Area is home to a picnic facility arranged around three clusters of tables with free barbeque pits and Pote Field, a NCAA regulation-sized adult baseball field. This facility is available for use by advance reservation only and features a scoreboard, bleachers, restrooms, children's play area and paved parking. The Picnic Area features mature landscaped areas and is ringed by an internal road system.

The vision for developing two new youth baseball fields in the Picnic Area has been considered for the past several years. Five separate conceptual designs, each featuring two baseball diamonds at different site locations with alternative layouts and dimensions were developed by the City in the May-July, 2005 timeframe. Since then, the decision has been made to locate twin Little League regulation-sized

baseball fields in a landscaped area located immediately south of the two golf courses and east of Pote Field. The site selected is located in a largely open area that is partially landscaped with trees. A preliminary site plan has been developed as well as a schedule and budget for final design and construction. Pote Field parking and restroom facilities are expected to be made available for use. It is planned as a day-use facility.

These communities are collectively characterized as having a populace that is racially diverse, low-to moderate income, family oriented and growing slowly in size and density. Census data projections for 2009 estimated that almost 25 percent of the population living within a 3.0-mile radius of the project site is categorized in the 15- to 34-year age range. This represents over 27 percent of the total persons residing within a 5.0-mile radius of the Crystal Springs Picnic Area.

The current lack of Little League Regulation-Sized Baseball Fields in Griffith Park highlight just how great the need is for the City to provide its residents with such team-sports programming opportunities as documented in the recently prepared City of Los Angeles Department of Recreation and Parks (RAP) Citywide Parks Needs Assessment Report (2008). Current calculations show a per capita ratio of 1 baseball field per 15,449 persons. RAP Five-Year Planning Goals call for the elevation of this ratio to 1 baseball field per 12,000 persons by 2013. This goal can be met with the addition of 73 new baseball fields including these two fields.

- b. Provide a detailed narrative history of agency/organization's previous experience with capital improvement projects (including project management) and results of that involvement.

The Department of Recreation and Parks (Department), governed by the Board of Recreation and Park Commissioners, has provided quality recreational services to the citizens of Los Angeles for over 100 years. It has also operated and maintained the City's parks, swimming pools, public golf courses, recreation centers, museums, childcare centers, youth camps, tennis courts, sports programs and programs for senior citizens. The Department's annual budget has averaged in excess of \$150 million annually for the past three years.

The Department and the Department of Public Works, Bureau of Engineering (BOE), have worked cooperatively on hundreds of the Department's Proposition K, State and federally funded capital improvement projects, including the construction of recreation centers, swimming pools, pocket parks, athletic fields, community centers, trails, childcare centers, playgrounds, and skate parks. The two departments utilize staff resources and administrative authority granted by the City Charter to develop project implementation plans for all capital improvement projects. This unique collaborative relationship has provided the best possible utilization of staff and City resources to facilitate the completion of hundreds of capital improvement projects, like the multi-million dollar Taylor Yard Sports Fields, Griffith Park Observatory, and the Lanark, Echo, Northridge and Harvard Park pool projects. Both Departments have extensive and broad experience developing and managing Proposition K projects and hundreds of other projects funded by federal, state, and local funding

ATTACHMENT 2





The Juan Bautista de Anza National Historic Trail in Griffith Park

Planning for the trail is a cooperative effort of Friends of Griffith Park, the National Park Service, the National Park System, the Los Angeles Department of Recreation and Parks.



This brochure was prepared by Friends of Griffith Park in partnership with the National Park Service/Juan Bautista de Anza National Historic Trail.



The National Park Service guides the preservation, development, and management of the Anza Trail in partnership with local, state, and federal agencies, historical groups, and private individuals. Management of trail resources and day-of-use permits will be handled by the local agencies.



Griffith Park Visitor Center

Griffith Park is a 1,200-acre park in Los Angeles, California. It is the largest city park in the United States and is a popular destination for visitors. The park is home to many historic landmarks, including the Griffith Observatory and the Griffith Park Zoo.

Since Fall 2011, Friends of Griffith Park has been involved in an initiative to identify and enhance Griffith Park's portion of the trail, serving as Project Coordinator for a primary planning team that includes the National Park Service, the City of Los Angeles, and the Griffith Park Conservancy.

In 1890, Congress created the Juan Bautista de Anza National Historic Trail to honor the legacy of the explorer. The trail includes the 1,200-mile route from San Francisco, California, to the San Gabriel Valley, Texas.



The Anza Trail in Griffith Park

### In 1775, the winds of change were blowing across America...

While in the east, the thirteen colonies launched a war of independence from English rule, in the west, new settlers reached the end of an epic 1,200-mile journey. They were the families of the Anza Expedition, and their arrival would change California forever.

In the fall of 1775, a company of soldiers, their wives, and children left present-day Arizona under the command of Captain Juan Bautista de Anza. With more than 240 people and 1,000 head of livestock, they completed Spain's first overland colonizing expedition into isolated Alta California. Their goal was to establish the empire's northernmost settlement at San Francisco Bay.

The young families' journey across deserts, rivers, and mountains was a risk, but they succeeded. In February 1776, the expedition reached at Rio de Los Angeles, camping near the site of today's Griffith Park.

Continuing north, Anza's party left a changed California in its wake. The settlers would establish San Francisco and San Jose, and lay the foundation of modern California.

Today, Griffith Park contains a premier segment of the 1,200-mile Juan Bautista de Anza National Historic Trail. The 4-mile recreation trail in Griffith Park is one of the best places in the Los Angeles area to reflect on the legacy and impact of the historic Anza Expedition.

Explorations and Hardships. By 1775, the Spanish presence in Alta California consisted of two struggling presidios (forts) and five young mission communities. The crown's motivation

clothing, livestock, and opportunity. More than half of the expedition members were children.

Since there were no roads, there were no wagons; pack mules and donkeys carried the band's six tons of food, tents, and implements. Altogether, the expedition made up a column that was a mile long and a quarter-mile wide.

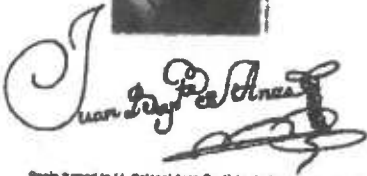
The travelers faced blistering drought in the California desert and were pinned down for four days in the Santa Rosa Mountains shivering through sleet and snow. On Christmas Eve, 1775, they reached Mission San Gabriel where they rested for six weeks before resuming toward present-day Griffith Park.

The Feliz Family. Enlisted soldier Jose Vicente Feliz, his wife Maria, and their children were among the Anza Expedition families. Maria was one of eight women who were pregnant at the outset of the expedition. On their first night after leaving Tubac, tragedy struck the family. As expedition chaplain Father Pedro Font recorded in his journal,

"In the night the wife of a soldier gave birth to a fine boy, but...the woman died in childbirth early in the morning." Maria was buried at Mission San Xavier del Bac. Feliz and his six children, including his newborn son, resumed their journey.

Eight months and 1,200 miles later, the families reached San Francisco and established a presidio. Jose Feliz remained there until 1781 when he was called to a special assignment: overseeing the establishment of a new town, El Pueblo de la Reina de Los Angeles. He would become a key figure in the new settlement and, in 1787, was appointed Comisionado of Los Angeles—the pueblo's highest authority. In return for his services, Spain awarded Feliz 6,647 acres upstream from the pueblo. His holdings became known as Rancho Los Feliz and played an important part in the life of the town.

The Anza Expedition was an enormous undertaking. By day, the column was a mile long and a quarter-mile wide. When it pitched camp for the evening, its sea of tents and cooking fires resembled a small town.



Spain turned to Lt. Colonel Juan Bautista de Anza to command its risky expedition. Son of a Genoese soldier, he enlisted in the Spanish army in 1752 and advanced rapidly to the rank of Captain on the frontier at the Tubac Presidio. To gauge the prospects of a colonizing mission, he made a preliminary exploration of Alta California in 1774. Pleasured with what he saw, he returned to Tubac to organize a full-fledged expedition with San Francisco Bay as its goal.

In sending settler families and livestock was to strengthen the colony and hold off English and Russian expansion.

The motivation of the expedition members, however, was more familiar: the hope for a better life. Anza had recruited the families from the present-day states of Shaboo and Sonora, Mexico. The people represented many castes of the Spanish frontier—a mix of Native American, European, and African heritage. The expedition left Tubac on October 23, 1775. The 240 colonists left behind all that was familiar in exchange for several sets of







In 1776, Los Angeles was a place of wild beauty. The Gabrielinos, its original inhabitants, lived in its foothills, canyons and plains. The knowledge they shared with the colonists of which paths to take and hazards to avoid, was invaluable to the expedition, and Anza ordered his soldiers to treat them with respect.

Mexican independence ended California's Spanish era, and U.S. statehood followed. In 1885, Colonel Griffith J. Griffith purchased the former rancho and in 1896 gave it to the city to create Griffith Park. By 1921, the old Feliz Adobe was slated for demolition, but concerned citizens rallied to save it, and today it is marked with a plaque honoring Jose Feliz for his pioneering role in Los Angeles, and Colonel Griffith for making the Park possible.

**The Trail in Griffith Park.** The Anza Trail in Griffith Park is a relatively flat, 4-mile trail. It runs the length of the park and reveals the change that European settlement brought upon California's natural and cultural landscape.



Just as the Anza Expedition families followed fresh waterways on their journey—for their own survival and for their livestock—the trail in Griffith Park runs parallel to the Los Angeles River. The trail connects directly to the river at several points, encouraging users to encounter it at close hand.

Remnants of oak woodland plant communities and views of Griffith Park's hills first at the landscape encountered by the Anza Expedition in 1776. Elsewhere, the trail skirts modern picnic areas, a major golf course, and the epitome of present-day migration: the freeway.

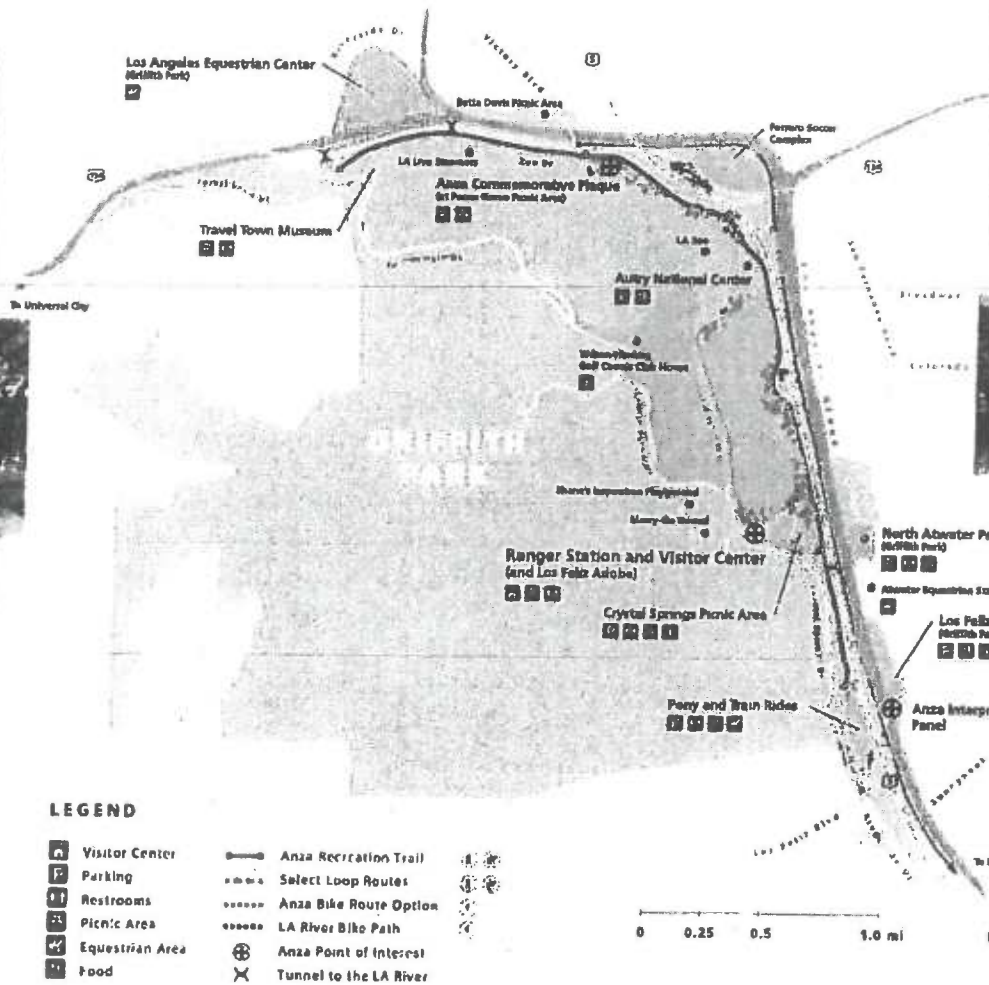
The Feliz Adobe, a discrete City of Los Angeles Historio-Cultural Monument, is an easy walk from the trail. It provides a tangible link to the Anza Expedition in the person of Corporal Jose Vicente Feliz whose rancho is now the Park. It is situated on the courtyard of the Griffith Park Ranger Station and Visitors Center, which offers exhibits about the Park and its attractions, picnic tables and restrooms.



Born in 1849, Anastasio Maria Feliz is said to be one of the last inheritors of Rancho Los Feliz. Today his adobe is a part of the Griffith Park Ranger Station and Visitor Center complex.



A 2013 pilot hike with a National Park Service Interpretive Ranger is the first in a joint program to be conducted by City of Los Angeles and NPS Rangers.



**LEGEND**

- Visitor Center
- Parking
- Restrooms
- Picnic Area
- Equestrian Area
- Food
- Anza Recreation Trail
- Select Loop Routes
- Anza Bike Route Option
- LA River Bike Path
- Anza Point of Interest
- Tunnel to the LA River



Placed in 1996, this Anza Expedition commemorative marker is in the Pecan Grove Picnic Area alongside the trail.



One of the region's most natural stretches of the Los Angeles River is just steps from the trail.



**ATTACHMENT 3**



## United States Department of the Interior

**NATIONAL PARK SERVICE**  
Juan Bautista de Anza National Historic Trail  
333 Bush Street, Suite 500  
San Francisco, California 94104  
415 623-2340

IN REPLY REFER TO:

December 13, 2013

Gerry Hans  
President, Friends of Griffith Park  
2624 Green Oak Place  
Los Angeles, CA 90068

RE: Enhancement of Griffith Park's Certified Segment of Anza National Historic Trail

Dear Mr. Hans:

The Juan Bautista de Anza National Historic Trail commemorates the 1775-76 Spanish expedition of the more than 240 men, women, and children who journeyed across the frontier of New Spain to settle *Alta California*. The Anza Trail connects history, nature, culture, and outdoor recreation along a 1200-mile corridor extending from Nogales, AZ to the San Francisco Bay Area. This historic corridor includes a 30-mile stretch along the Los Angeles River, spanning from its headwaters in Canoga Park to its confluence with the Arroyo Seco near downtown Los Angeles, and runs directly adjacent Griffith Park.

The National Park Service is honored to be a partner in sharing the compelling, multi-ethnic story of the Anza expedition and helping to steward the Anza Trail for generations to come. An integral component of our success is working with local partners to provide on-the-ground experiences which help connect the Anza story to the community and raise awareness of its place in shaping local history. Toward that goal, in 1996 the National Park Service partnered with the City of Los Angeles to certify a 4-mile stretch of trail along the northern and eastern boundary of Griffith Park as an official component of the Anza National Historic Trail's recreational retracement route.

In highly urbanized segments of the historic trail corridor, such as that found throughout the greater Los Angeles area, our ability to share effectively the story of Anza is greatly dependent upon environmental conditions which provide the community a vicarious experience of the setting and surroundings representative of what the expedition would have encountered during its historic journey. Griffith Park's rich and diverse natural resources prove an ideal setting for such transformative interpretive experiences.

Therefore, I wish to express my support for the Friends of Griffith Park's work with the National Park Service's Rivers, Trails and Conservation Assistance (RTCA) program to assess current trail

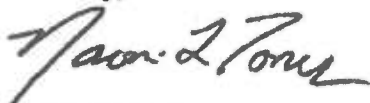
conditions and develop a comprehensive plan for trail enhancement which facilitates access to, builds awareness of, and improves the environmental conditions surrounding Griffith Park's Anza Trail segment.

In particular, I encourage your efforts to seek ways to improve the trail users' experience by mitigating some of the negative impacts associated with the trail's proximity to the I-5 freeway corridor. Specific strategies to address noise pollution, visual/view shed impacts, and habitat and air quality have direct and positive implications to our work in sharing Anza's story and revealing the nature of the expedition's journey in this area centuries ago.

While these measures can sometimes seem daunting in scale and scope, every effort made to improve habitat quality and environmental conditions in this area, regardless of size, not only facilitates the community's connection to its natural environment but to its cultural heritage as well. For this reason, I applaud your efforts to help NPS steward this natural, cultural, and recreational resource for the broader community and support your work in enhancing its overall condition for generations to come.

Thank you for your time, care, and consideration!

Sincerely,

A handwritten signature in black ink that reads "Naomi L. Torres". The signature is written in a cursive style with a large, sweeping initial "N".

Naomi L. Torres  
Superintendent



**ATTACHMENT 4**

## **Task Order Solicitation**

### **Pre-Qualified On-call Architectural Division Consultant Contract**

**City of Los Angeles  
Department of Public Works  
Bureau of Engineering**

**October 2, 2013**

#### **1. Introduction**

The City of Los Angeles, Bureau of Engineering (BOE) is proposing to construct two (2) youth baseball fields and additional amenities, including, but not limited to bleachers, fencing, trash enclosure, ADA path of travel, security lighting, parking and modification of the existing driveway at the Griffith Park Crystal Springs Ball Fields. The project site is located at 4730 Crystal Springs Drive, Los Angeles, CA 90027, in the Griffith Park area, bounded on the north by Los Feliz Boulevard and on the west by Interstate Freeway 5.

The design of this project is scheduled to start immediately upon issuance of an NTP to the selected firm, with anticipated construction to begin in summer 2014.

#### **2. Background**

This is a competitive Proposition K project. It was designed by Land Images, a prequalified on-call landscape consultant for the Department of Recreation and Park (RAP). This contract recently expired. The project received a lot of input from the community during the community outreach phase. Land Images provided the schematic designs and alternatives during the public meeting periods. The majority of Local Volunteer Neighborhood Oversight Committee (LVNOC) members approved the schematic layout at Crystal Springs, in the Griffith Park area. The proposed location will result in removal of existing trees and displacement of picnic tables. Construction plans were prepared by Land Images and submitted to the Los Angeles Department of Building and Safety for plan check in September. However, other disciplines of design, including, but not limited to civil, structural, and electrical still needs to be addressed in order to have complete constructible plans.

#### **3. Scope of Services**

The Bureau is interested in obtaining the services of a consulting landscape firm to continue the design of the project. To successfully deliver the project, it is important for BOE and its Consultant to work closely with the Department of Recreation and Parks (RAP), who is the BOE's client. As such, RAP input and review will play a central role in this project.

The scope of services is as follows:

- 2.1 Preparation of complete design and construction documents for the project based on your Design Services Agreement with the City of Los Angeles, Bureau of Engineering. The design services shall include, but are not limited to, landscape, architectural, electrical engineering, structural and civil engineering for the project. The City of Los Angeles will provide the geotechnical investigation report, and a topographical survey of the project site. The City is currently preparing the Environmental Impact Report (EIR) for the project. Once the report is finalized, additional design is needed to address the required mitigation measures.
- 2.2 The Construction Budget for the proposed project is set at \$1,300,000.
- 2.3 The design and construction documents, which include landscape, structural, civil, and electrical drawings, must be completed, and all applicable approvals from agencies having jurisdiction over the project, such as Building and Safety, City Planning, and Fire Department must be obtained within 6 months following the Notice to Proceed date.
- 2.4 The project specifications for this project shall be based on the Construction Specification Institute (CSI) format. The specification shall be double-spaced on one side of 8-1/2" x 11" bond paper. The City will prepare the General Conditions and the General Requirements of the specifications, the bid forms, instruction to bidders, bond forms, advertisement for bids, construction agreements and other documents required by public authorities having jurisdiction and as necessary for securing the bids for construction of the project.
- 2.5 The location of any existing utilities and controls, such as but not limited to, storm drain lines, sewer lines, irrigation controls, lighting controls, water lines, etc., shall be verified and relocated within the affected area of reconstruction.
- 2.6 The selected consultant shall perform the following:
  - a. Attend meetings with City staff members and prepare meeting minutes during the design phase of the project.
  - b. Meet with the Department of Building and Safety (LADBS) and all agencies having jurisdiction over the project for preliminary plan check review and code requirement verifications.
  - c. Prior to the start of design, coordinate with the Department of Recreation and Parks (RAP), the Department of Water and Power (DWP) Service Planners and other pertinent utility companies to confirm availability of service connections and meter locations; perform design work for any modification that may be required by DWP and other utility companies.

and acquire all necessary/applicable permits for utility service connections. The City will pay for all permits and fees in conjunction with this paragraph.

- d. Submit plans for review, comments, and approval at the completion of schematic design, design development, 50% construction documents, and 90% construction documents. Working drawings shall be submitted as six sets of copies (two full-sized and four half-sized). Specifications and cost estimates shall be submitted at the completion of 50% and 90% construction documents. Cost estimates shall indicate the quantity and unit cost of each component based on the 16 divisions of the CSI. The City will do a final coordination review and comments on the 90% construction documents. The Architect will incorporate these final comments along with the Architect's internal review to arrive at the 100% construction documents.
- e. All construction documents must be provided in electronic format (pdf) for the drawings and specifications (on CD). Upon request, AutoCAD file of the drawings shall be provided to the City. Project drawings shall be on 24-inch by 36-inch sized sheets with a modified City, Bureau of Engineering (BOE) Title Block, which includes a space at the lower right hand corner for the Department of Recreation of Parks Plan File Number. The City Project Manager will provide an electronic copy of the modified BOE Title Block.
- f. Submit the 90% CD plans to the Los Angeles Department of Building & Safety (LADBS) for a courtesy review. The City will pay the Plan Check Fees (i.e. - for building, grading, electrical, etc.). This project is located on Federal land and, as such, a Building Permit is not required; however, the City desires that the project conform substantially to current codes. Obtain the LADBS comments and incorporate them into the plans, except as directed by the Project Manager, in order to bring the documents up to (or close to) the status of "Ready to Issue" (RTI).
- g. Review and respond to requests for information (RFIs), submittals, and shop drawings prior to and during the construction of the project. Prepare any required plan clarifications in conjunction with the response to RFIs.
- h. Attend weekly meetings and prepare meeting minutes during the construction phase of the project. Construction meetings will be held at the job site and will be approximately 1 hour in length. The construction duration for this project will be approximately 12 months.
- i. Provide availability to clarify issues during the construction phase regarding changes in condition (i.e. when construction documents do not match the existing conditions).

- j. Participate in the BOE construction closeout process and prepare the final "As-Built" drawings in AutoCAD and pdf format (on CD's).

### **3. Project Schedule**

The following is an estimated Project Schedule:

- Pre-Design..... 2 week
- Design..... 6 months
- Bid and Award.....3 months
- Construction..... 12 months
- Project Close-Out..... 6 months

### **4. Solicitation Schedule**

- Issue Task Order Solicitation.....October 2<sup>nd</sup>, 2013
- Receive Solicitation Responses.....October 17<sup>th</sup>, 2013
- Consultant Selection.....Week of October 28<sup>th</sup>, 2013
- Negotiate Task Order.....Week of October 28<sup>th</sup>, 2013
- Issue Task Order.....Week of October 28<sup>th</sup>, 2013

### **5. Mandatory Pre-Proposal Site Visit**

A mandatory pre-proposal jobsite visit will be conducted at 10 AM on Wednesday, October 9<sup>th</sup>, 2013 at the site.

### **6. Solicitation Response Requirements**

Solicitation Responses shall be bound and not exceed 45 pages, exclusive of cover, dividers and resumes. Three copies shall be submitted no later than 4 PM on October 17<sup>th</sup>, 2013. Solicitation Responses shall be submitted to the 8<sup>th</sup> Floor receptionist, Sandra Humphries, of the Recreational and Cultural Facilities Program, located at Public Works Building, 1149 S. Broadway Ste#880, Los Angeles, CA 90015, Attention: Mr. Neil Drucker. Bound Solicitation Responses shall include:

- Section 1 – Project understanding: Explain your firm's overall approach to the work.
- Section 2 – Related Experience: Describe similar projects your firm has recently completed.
- Section 3 – Project Team: Provide project team organization chart and describe background, roles and responsibilities of key team members. Provide information on MBE/WBE/OBE involvement. Provide resumes of those who will actually work on the project in the Appendix.
- Section 4 – Detailed Scope of Work and Schedule: Expand and develop the City's Scope of Work and Schedule contained herein.

- Section 5 – Fee Estimate. Provide cost calculations (firm) for the work described in the Scope of Work. List assumptions associated with all cost calculations. List MBE, WBE, and OBE participation as a % for each phase.
- Appendix: Include resumes

#### **7. Selection Criteria**

The selection criteria and scoring "weight" will be as follows:

- Capability and qualifications of the firm to provide the Scope of Services as demonstrated by the solicitation response. – 20%
- The Project Team's and /or individual Team member's experience as it relates to the scope of this project. – 40%
- History of the firm in successful budget and schedule compliance – 20%
- The value offered to the City considering the proposed Fee Estimate – 20%
- Any proposal submitted by a firm who has not attended the mandatory pre-proposal job site visit will be disqualified to provide bid

#### **8. Suggested MBE/WBE Participation Levels**

It is the long standing policy of the City that personal services contracts should, to the maximum extent reasonably feasible, include the utilization of subconsultants – Minority Owned, Women Owned and Other Business Enterprises – MBE/WBE/OBE. A Good Faith Outreach is required of the prime consultants during the procurement process on all personal services contracts over \$100,000. It should be noted that while this Outreach effort is not mandated on contracts below \$100,000, the use of MBE/WBE/OBE on these contracts is encouraged where feasible.

#### **9. Insurance Requirements**

Insurance policies must be current and on file with the City Administrative Office (CAO) – Risk Management when the Task Order is awarded to the selected Pre-Qualified On Call Consultant. Work cannot commence or continue if the proper proof of insurance forms is not on file with the CAO. Also, invoices will not be paid if the proper proof of insurance forms is not on file with the CAO.

#### **10. Solicitation Manager**

The City's Solicitation Manager is Mr. Neil Ducker, Program Manager, Bureau of Engineering, Recreational and Cultural Facilities Program. Please direct all project related questions to Sean H Phan at (213) 847-4706.

#### **11. Non-Collusion Affidavit**

A non-collusion affidavit must be included and signed by the consultant, and returned with the proposal.

**12. Disclaimer**

The City may or may not decide to award any or part of this Task Order based on its sole convenience and shall not be responsible for any solicitation

The Landscape Architect prequalified on-call contracts are expired. No notice of proceed will be issued until the contract amendment has been fully executed.

**CONTACT INFORMATION**

All questions and written notices shall be sent to the Project Manager:

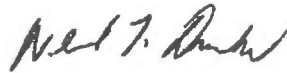
Sean Phan  
Bureau of Engineering, Recreational and Cultural Facilities Division  
1149 South Broadway, Suite 860  
Los Angeles, CA 90015  
Sean Phan – 213-847-4706, or e-mail [Sean.Phan@lacity.org](mailto:Sean.Phan@lacity.org)

This task order solicitation is not an authorization to start this work. An NTP will be issued when your firm has been selected and your fee proposal has been accepted.

Proposal is to be delivered by 4:00 PM on October 17<sup>th</sup>, 2013, and addressed to

Neil Drucker, Program Manager  
Bureau of Engineering, Recreational and Cultural Facilities Division  
1149 South Broadway, Suite 860  
Los Angeles, CA 90015  
Attention: Sean Phan

Sincerely,



Neil Drucker  
Program Manager  
Recreational and Cultural Facilities Program

ND/SP  
Griffith Park Crystal Springs Ball Fields

Attachments: CrystalSprings\_Schematic Layout

cc: Cathie Santo Domingo, RAP Planning & Construction  
Bill Lee  
Mark Nakata  
Neil Drucker  
Shashi Bhakta  
Sean Phan  
File

**NON-COLLUSION AFFIDAVIT**

The appropriate, authorized operator's designate must sign and affix the corporate seal (see space below).

I, \_\_\_\_\_, depose and say that I am  
\_\_\_\_\_ of \_\_\_\_\_  
("President," "Vice-President," etc.) (Insert Name and Address of Organization)

who submits this proposal to the City of Los Angeles, City Attorney's Office, and hereby declare that this proposal is genuine, and not sham or collusive, nor made in the interest or in behalf of any person not herein named and the proposer had not directly induced or solicited any other proposer to put in a sham proposal, or any other person, firm, or corporation to refrain from submitting a proposal, and that the proposer has not in any manner sought by collusion to secure for him/herself an advantage over any other proposer.

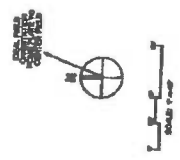
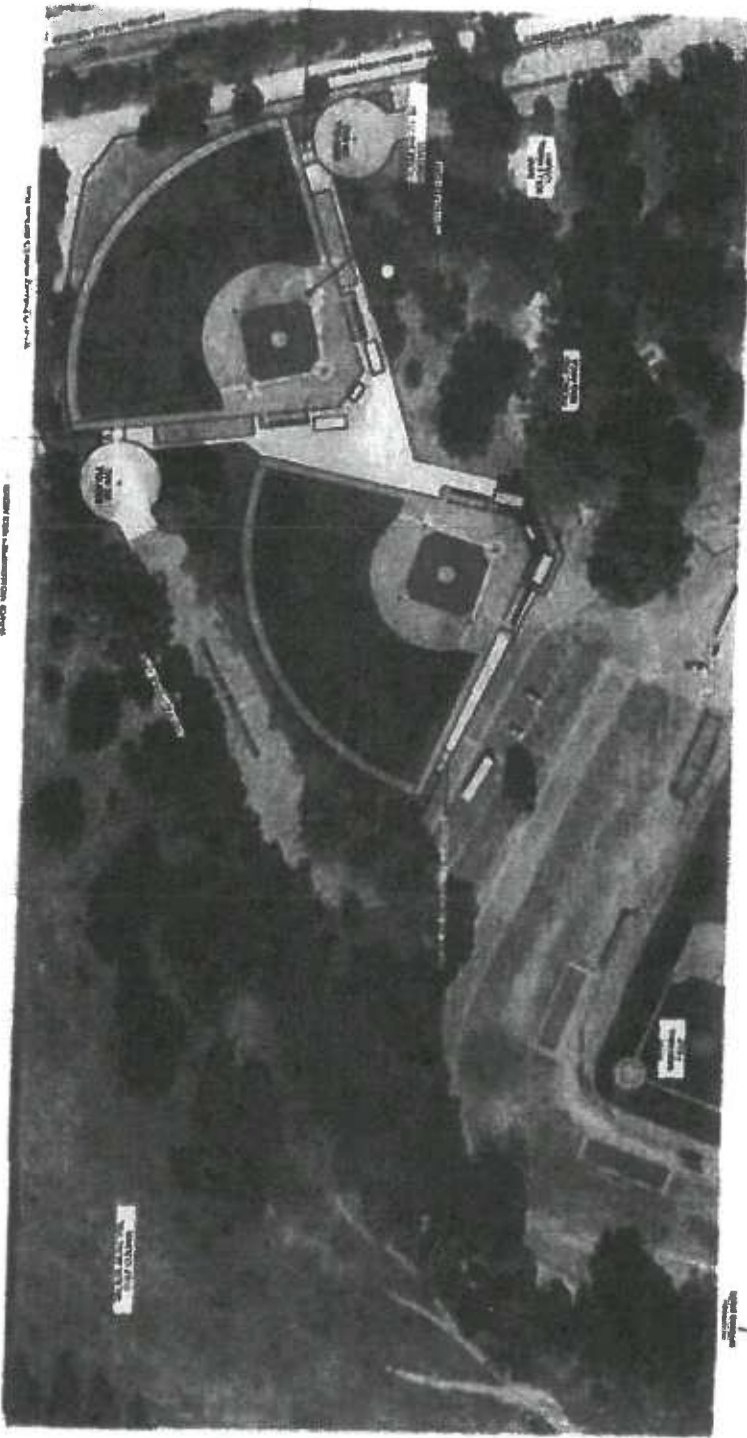
Date: \_\_\_\_\_ at \_\_\_\_\_  
(Month, Day, Year) (City, State)

(Corporate Seal)

I certify under penalty of perjury that the foregoing is correct.

\_\_\_\_\_  
(Signature)





THESE BALLFIELDS WERE DEVELOPED BY THE CITY OF CRYSTAL SPRINGS, GEORGIA. THE CITY OF CRYSTAL SPRINGS, GEORGIA, IS THE OWNER OF THESE BALLFIELDS.

**PROPOSED GRIFFITH PARK BALLFIELDS**  
Crystal Springs Location



**EXHIBIT F**

March 16, 2014

Ms. Lynn Alvarez, President  
Los Angeles City Recreation and Parks Department  
Office of Board of Commissioners  
221 N. Figueroa St. Suite 1510  
Los Angeles, CA 90012

Re: **Opposition to Agenda Item 14-056 (March 19 Agenda)**  
**Opposition to Agenda item 14-061 (April 2 Agenda)**  
**Opposition to Agenda Item 14-062 (April 2 Agenda)**

Dear President Alvarez:

The referenced agenda items continue and accelerate a policy of increased commercialization in Griffith Park.

Item 14-056 concerns the Halloween Event. In your discussion on March 5, 2014 about this item, almost ALL of the discussion concerned how much the City will receive from the contractor. No one claimed to know how much revenue had been generated by last year's Haunted Hayride event.

There was NO discussion about any of the following:

- The appropriateness of using the park to promote adult themed events
- The displacement of myriad mostly low income passive users of the Old Zoo area
- The myriad wildlife which will be affected by noise, traffic, and lighting caused by the event

Item 14-061 concerns the installation of baseball fields in the Crystal Springs picnic area. In the Report of General Manager, it notes that "the project would result in significant environmental impacts related to aesthetics, biological resources, cultural resources (includes historic, archaeological and paleontological resources), and noise." But then the report admits that "no feasible mitigation measures were identified...significant impacts ...would be **adverse and unavoidable.**" (emphasis added).

Later in the report, it states that "the statement of overriding considerations explains in detail why the social, economic, legal, technical or other beneficial aspects of the project outweigh unavoidable, adverse environmental impacts, and why the lead agency is willing to accept such impacts."

In considering the "social" impacts, is the displacement of mostly low income and passive users of the picnic area addressed? Here again, I note that "economic" considerations (I assume Rec & Parks receives a little cash from the ballfields users) trump all else. Turning Griffith Park into a cash register seems to be your overriding concern.

Item 14-062 concerns installation of a permanent Performing Arts Center in the Old Zoo picnic area. It is not *adjacent* to the Old Zoo picnic area, as is stated in the general manager's report. In the general manager's report **there is not one word** about the displacement of mostly low income passive users of the Old Zoo picnic area. **There is not one word** about year round increase in noise, traffic, lighting, and the impact on wildlife. Furthermore, the construction of such permanent edifice is inconsistent with the urban wilderness character of Griffith Park, and it ignores the cultural, historic status of Griffith Park.

There is no need to build a permanent stage. A temporary stage has worked well in recent years.

Taken together, the three proposals continue the slicing and dicing of the relatively scarce, flat or gently sloping areas within Griffith Park suitable for picnicking and other passive activities. The proposed ballfields will carve out a significant section of the Crystal Springs picnic area, the permanent stage carves out a section of the Old Zoo picnic area, and the Halloween event (aka Haunted Hayride) takes the Old Zoo picnic area completely out of service as a picnic area for over a month each year.

All three of these misguided proposals continue proceeding on the slippery slope of commercialization of Griffith Park. **This is not what parks are supposed to be about!**

The Commission should reconsider all three of these proposals and address the cumulative, adverse impact of these proposals on wildlife, passive users of picnic areas, and cultural, historic aspects of Griffith Park.

Regards,

Joseph F. Young  
C-chair, Griffith Park Task Force  
Sierra Club – Angeles Chapter

Copies:

Vice President Iris Zuñiga  
Member Kafi D. Blumenfield  
Member Sylvia Patsaouras  
Member Misty M. Sanford

**EXHIBIT G**

From: Van Griffith <gvg805@aol.com>

To: mgranne <mgranne@aol.com>

Cc: rap.commissioners <rap.commissioners@lacity.org>

Subject: Dear Mr. LaBonge,

Date: Sun, Mar 23, 2014 2:21 pm

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Dear Mr. LaBonge,

I am writing on behalf of myself and the Griffith charitable trust to express our opposition to the ball fields proposed in the Crystal Springs picnic area of the park. This area is one of the most pristine picnic places in the park and the most heavily used. To remove 49 mature trees for the benefit of 50 to 100 little leaguers that would only use it on the weekends would be a shame. Especially if these fields are going to be locked when not in use and not available to the public is something I feel my great grandfather would strongly oppose. I cannot help but think of the tens of thousands of families who live in apartments with no backyards or lawns whatsoever who would be denied access to this beautiful spot. I feel a much better place for the fields would be up by the soccer fields. I think it should be called The Tom Labonge Sports Complex at Ferraro fields. There is plenty of room up there and no need to remove the beautiful trees. I hope you will consider this alternative location. If you have questions or comments please don't hesitate to call me.

Yours Truly,

Van Griffith

Cc. Maria Martin

Sent from Van Griffith

**EXHIBIT H**

# The Griffith J. Griffith Charitable Trust

March 24, 2014

Ms. Lynn Alvarez, President  
Board of Commissioners  
City of Los Angeles Department of Recreation and Parks  
221 North Figueroa Street, Suite 1510  
Los Angeles, CA. 90012

Dear Ms. Alvarez and Commission Members,

The Griffith J. Griffith Trust established by Col. Griffith in 1924 strongly opposes the construction of Little League ball fields in the Crystal Springs picnic area for the following reasons:

1. The annihilation of the 40+ mature trees, some protected, which have shaded picnic tables and family gatherings there over centuries. To sacrifice them for any reason is incomprehensible and on that basis alone, should preclude the area from site consideration. I would encourage you Commissioners to walk the area to see firsthand how majestic these trees are and which ones would be bulldozed. Transplantation is not a viable option. For years experts have been unable to sustain re-growth. (When the L.A. Zoo Veterinarian Complex was constructed, some transplanted mature trees died).
2. The EIR is sadly lacking and often erroneous as the law firm of Chatten-Brown & Carstens so meticulously pointed out in their 13 page letter to the Bureau of Engineering. What corrections have been made as a result?
3. Should a majority of picnic users from all over the L.A. region be displaced by a minimum number of sports participants? This bucolic most accessible and heavily used area has been enjoyed by generations of families. Ball fields belong in a sports-friendly site not an established picnic grove.
4. Contrary to the EIR, the entire eastern portion of the park would be heavily impacted from the approximate 2 year construction period; especially the Ranger Operations, Visitor Center, historic Los Feliz Adobe, equestrians and golfers on a nearby green—not to mention a traffic nightmare with trucks and equipment entering and exiting from Crystal Springs Drive.
5. Col. Griffith did not envision his parkland to be carved up by Special Interests groups—his intent was to establish an oasis for all Angelenos to enjoy, a respite from the noise and distractions of everyday life outside its borders.

Los Angeles has been involved in the Million Tree Project, planting trees throughout the City rather than destroying them. Removing trees would be hard to justify. I would hope this Commission would agree that Crystal Springs should remain a picnic area not a sports venue.

Respectfully



Van Griffith, Mike Eberts, Clare Darden  
Griffith J. Griffith Charitable Trust members



**EXHIBIT I**

**CHATTEN-BROWN & CARSTENS LLP**

2200 PACIFIC COAST HIGHWAY

SUITE 318

HERMOSA BEACH, CALIFORNIA 90254

[www.cbcearthlaw.com](http://www.cbcearthlaw.com)

TELEPHONE:(310) 798-2400

FACSIMILE: (310) 798-2402

E-MAIL:  
MNB@CBCEARTH.LAW.COM

March 31, 2014

*Via U.S. Mail and email [Maria.Martin@lacity.org](mailto:Maria.Martin@lacity.org)*

Ms. Maria Martin  
City of Los Angeles Bureau of Engineering  
Environmental Management Group  
1149 S. Broadway, 6th Floor, Mail Stop 939  
Los Angeles, CA 90015-2213

Re: SCH No. 2013011012  
Final EIR Comments on Griffith Park Crystal Springs New Baseball Fields  
Proposition K

Dear Ms. Martin:

We submit these comments on behalf of Friends of Griffith Park (FoGP). Friends of Griffith Park is a non-profit charitable group that promotes the enlightened stewardship of Griffith Park so it can survive and thrive in the 21st Century. The Draft EIR (DEIR) prepared for the Project finds that the proposed Crystal Springs ball fields site would have significant and unavoidable adverse impacts on aesthetics and biological resources. Based on these findings and on previous communications with the City, FoGP submitted comments on the DEIR that included various alternatives to the proposed Project site, designed to lessen or avoid the Project's significant impacts, particularly with regard to tree removal. These alternatives included alternative configurations of the ball fields, and separation of the ball fields into two separate sites. Unfortunately, the final EIR (FEIR) fails to provide the adequate responses to these comments, or to supplement the DEIR's inadequate analysis of the Project's impacts.

The EIR is a document of accountability. (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 392.) CEQA ensures accountability through the requirement that the Lead Agency provide written "good faith, reasoned analysis" in response to comments on an EIR by the public. (Guideline § 15088, subd.(c).) When a comment raises a significant environmental issue, the lead agency must address the comment "in detail giving reasons why" the comment was "not accepted." (*Ibid.*) "Conclusory statements unsupported by factual information will not suffice." (*Ibid.*; *Laurel Heights Improvement Assn. v. Regents of University of California* (1993) 6 Cal.4th 1112, 1124.) The level of detail of responses to comments must be commensurate with the level of

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detail of the comments. (*Friends of the Eel River v. Sonoma County Water Agency* (2003) 108 Cal.App.4th 859, 878 [“the determination of the sufficiency of the agency's responses to comments on the draft EIR turns upon the detail required in the responses”].)

This requirement for good faith, reasoned analysis “ensures that stubborn problems or serious criticism are not swept under the rug.” (*Santa Clarita Organization for Planning the Environment v. County of Los Angeles* (2003) 106 Cal. App. 4<sup>th</sup> 715, 732.) The courts have held that inadequate responses to comments – alone – can be grounds for voiding a project’s approval. (See, *Env. Protection Information Center. v. Johnson* (1985) 170 Cal. App. 3d 604, 627.) Failure to respond to a *single* comment is sufficient to invalidate approval of a FEIR. (*Flanders Foundation v. City of Carmel-by-the-Sea* (2012) 202 Cal. App. 4th 603.) The EIR fails to include good faith, specific responses to specific comments. In fact, the FEIR’s responses to FoGP’s comments are so cursory, that they are quoted in their entirety within this letter.

Friends of Griffith Park’s December 17, 2013 draft EIR comments raised issues with the EIR’s inadequate alternatives analysis, as well as its analysis of biological resources, aesthetics, recreational resources, and traffic congestion. These comments were detailed and well-supported. Even so, the final EIR dismisses many of these comments, particularly those directed at the EIR’s alternatives analysis.

For example, FoGP suggested several alternative sites for the Project, as well as alternate configurations that would avoid the need to remove as many protected trees as required by the Project. This would substantially lessen the significance of the Project’s impact on aesthetics and biological resources, as required by CEQA. Separating the two ball fields would also reduce impacts to recreational picnickers (by leaving part of the large group picnic area intact) as well as any traffic impacts (by diffusing project-generated traffic between sites). The FEIR responded to only one of FoGP’s suggested configurations, stating:

Placing one field at Crystal Springs and one at North Atwater Park would not qualitatively change the overall effects of the projects. Instead, impacts would be spread between two separate locations.

(FEIR p. 2-26.) While separating the ball fields would spread impacts between the two locations, it does not mean that those impacts would not be substantially lessened or avoided. The placement of only one new ball field in each location would provide greater flexibility to avoid the removal of protected trees. Thus, the total number of protected trees would be substantially reduced, with corresponding substantial reductions in aesthetic and biological impacts. The failure to study this alternative, given the Project’s significant and unavoidable impacts renders the EIR inadequate. The FEIR wholly ignored FoGP’s comments about

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other alternatives and did not provide the requisite good faith analysis.

With regard to FoGP's concerns about nesting birds, the FEIR responded only, "Potential effects on nesting birds are discussed in the Draft EIR and addressed in mitigation measure BIO-1." (FEIR p. 2-26.) No mention is made of species that were not analyzed in the EIR, habitat connectivity, wildlife corridors, or the City's tree ordinance.

The EIR also ignores FoGP's concerns about the impacts of night lighting, stating only, "The project does not include any night lighting, other than security lighting." (FEIR p. 2-26.) But no mitigation measures are included that prohibit nighttime lighting from being added to the Project later, and baseball is frequently a sport played at night, especially during the summer when daytime temperatures may be uncomfortable or dangerous.

Instead of substantively addressing FoGP's legitimate concerns about the Project's use of Proposition K funds and privatization of park resources, the FEIR's response to comment states only, "The project does not propose any privatization of dedicated park land." (FEIR p. 2-26.) No information is provided about how this will be accomplished, and no additional conditions are placed on the Project to ensure that it remains available to the public.

Finally, the FEIR's sole response to FoGP's concerns about traffic and parking congestion is, "Transportation and traffic impacts are discussed in the Draft EIR." (FEIR p. 2-26.) No effort is made to address the specific concerns raised by FoGP's letter.

The draft Statement of Overriding Considerations (SOC) is similarly deficient, as the findings required by Public Resources Code section 21081 are not supported by substantial evidence. With regard to aesthetics, the SOC states "no feasible mitigation measures were identified that would both address resulting impacts on aesthetics and meeting the project objectives." (SOC p. 23, p. 6.) FoGP specifically proposed alternate configurations of the ball fields and the idea of separating the ball fields in order to reduce their aesthetic impact on the Crystal Springs picnic area. Locating one ball field at Crystal Springs and one in another location satisfies all of the Project objectives. Additionally, mitigation measures need not themselves satisfy project objectives; they exist to mitigate the project's impacts. This finding is therefore unsupportable. With regard to impacts to protected trees, the SOC fails to even discuss alternatives or mitigation measures related to the protection of the trees themselves. (SOC pp. 7-8.) Instead, it skips straight to mitigation of impacts to nesting birds and declares that "[s]pecific economic, legal, social, technological, or other considerations...make infeasible the mitigation measures or project alternatives identified in the final EIR." Not one of these considerations is provided as rationale for the override, however.

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The draft SOC proposes to override the Project's significant and unavoidable aesthetic and biological impacts based on the alleged recreational opportunities the ball fields would provide. (SOC p. 24.) Specifically, the SOC claims the Project will "[i]ncrease[e] access to high quality, affordable recreational programs for youths in the area, especially at-risk boys and girls ranging from 6 to 12 years of age," "[p]roved[e] area residents with team-sports programming opportunities," and "[m]eet the requirements of available funding sources (Proposition K and Quimby Act)." (SOC p. 24.) However, nothing in the Project or its EIR actually requires the implementation of any type of recreational program for the community. And there are certainly no restrictions on programming to ensure that it is high quality, affordable, or directed toward at-risk 6 to 12-year-olds. There is also a significant likelihood that the Project's fields will be used for significant amounts of time by private entities, which would violate the requirements of Proposition K. Since the City has not responded to FoGP's DEIR comment request for information about the specific programming that would take place at the proposed ball fields, and since no further information is contained in the other documents available to the public, nothing supports the City's claims that the Project will actually provide the programming upon which the override of environmental harms is based. The SOC is wholly lacking in substantial evidence and cannot be sustained.

Friends of Griffith Park respectfully requests that the City revise the EIR prepared for this Project to include reasoned analysis of the additional, feasible alternatives suggested by FoGP, especially alternative placements of the fields. A thorough analysis of alternative configurations and locations that will actually avoid or substantially lessen the potential impacts of placing new ball fields in Griffith Park is required to comply with CEQA and to protect the integrity of Griffith Park. And as illustrated by the many letters, emails, and petitions submitted to the City in connection with this Project, the public supports an alternative that lessens impacts to the Crystal Springs picnic area.

Sincerely,



Doug Carstens  
Michelle N. Black

cc: Commissioners  
City of Los Angeles Department of Recreation and Parks  
Via email [RAP.Commissioners@lacity.org](mailto:RAP.Commissioners@lacity.org)