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May 2, 2014

Via Federal Express

Ms. Holly L. Wolcott, Interim City Clerk
200 N. Spring Street, Room 360
Los Angeles, CA 90012

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

Re: Appeal of adoption of initial study/mitigated negative declaration and
conceptual approval for the Performing Arts Center Project; W.O.
#E170202A; Public Resources Code § 21151 (c)

Dear Clerk:

On behalf of Friends of Griffith Park, the Griffith J. Griffith Charitable Trust, and Sierra Club Angeles Chapter Griffith Park Task Force ("Appellants"), we hereby appeal the April 2, 2014 decision of the Board of Commissioners of the Los Angeles City Recreation and Parks Department to adopt an initial study and mitigated negative declaration for the Griffith Park Performing Arts Center Project ("Project"). Section 21151 of the Public Resources Code provides, "If a nonelected decisionmaking body of a local lead agency certifies an environmental impact report... that certification ... may be appealed to the agency's elected decisionmaking body, if any." As the Board of Commissioners is not an elected decisionmaking body, its determinations under the California Environmental Quality Act (CEQA) are appealable to the City's elected decisionmaking body, the City Council. Appellants live near and recreate in Griffith Park and have a vested interest in protecting the Park's historic, biological, and recreational values. Appellants respectfully urge the City Council to deny approval of the Project until an environmental impact report (EIR) has been prepared that adequately discloses and mitigates the Performing Arts Center Project's significant adverse impacts.

The Project authorizes the construction of a permanent stage to serve audiences of up to 5,000 people in the Old Zoo Picnic Area portion of Griffith Park. The Project also includes ancillary development, such as a new switchboard, resurfaced parking lot, improved restrooms, power line relocation, pathways, and an Americans with Disabilities

Act-compliant bridge, although portions of the Project have not yet undergone environmental review or are mischaracterized in the initial study and mitigated negative declaration (MND). (See, Exhibit D.)

Dating to 1913 and later a center of Works Progress Administration projects, the Old Zoo Picnic Area is integral to Griffith Park's 2009 designation as Los Angeles Historic-Cultural Monument #942. The entire Old Zoo Picnic Area has been delineated as both a sensitive historic resource and a wilderness zone. Due to the site's proximity to higher-elevation areas and a seasonal stream, the Old Zoo Picnic Area is the only part of the Park known to host the gray fox and has the highest density and species of bats (including three special-status species). The construction of a permanent stage with poles for lighting and sound, pathway, and bridge would dramatically alter the visual character of the Old Zoo by overshadowing the aesthetic features for which it is known, a significant impact on historic resources. Additional nighttime activities and human presence will discourage use of the area by wildlife, thereby blocking known movement corridors. The Project would also introduce new sources of light and noise into the Old Zoo and adjacent significant ecological areas that adversely impact the behavior and foraging of nocturnal species, such as bats, mountain lions, and bobcats. Although the site is currently unlit, the MND contains no analysis or mitigation of the Project's lighting impacts. Alone and cumulatively, the Project's impacts due to the introduction of amplified sound could have significant adverse impacts on wildlife that have not been adequately considered or mitigated. There is a fair argument that the Project may have significant adverse impacts on historic and biological resources, and an environmental impact report is required.

In addition to its likely significant, unmitigated impacts on the Park's historic and biological value, the Project may have a detrimental impact on recreational resources that has not been adequately considered. An increase in the attendance or frequency of performances would reduce the Old Zoo Area's tranquility, especially for picnickers and passing hikers. The Project's use for events requiring an admission fee would restrict the site's availability for free recreation while also violating the restrictions of the Project's Proposition K funding.

Further, the MND has improperly piecemealed the Project's environmental review, as the bridge and accessibility improvements, and their likely environmental impacts, have been omitted from the analysis.

Considering its likely environmental cost, Appellants believe the Project is unnecessary. While Appellants support the spirit of free arts performances, permanent stages are already available for outdoor performances in Griffith Park. A new performance space is set to open at the Los Angeles Zoo in 2015.

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Friends of Griffith Park, the Griffith J. Griffith Charitable Trust, and the Sierra Club Griffith Park Task Force look forward to scheduling the hearing on this appeal. Appellants hereby incorporate into this appeal the letters submitted to the City and its departments on May 22, 2013, January 22, 2014, and March 16, 2014. These letters contain additional information and detail regarding the basis of this appeal. (See, Exhibits C-E.)

Thank you for your consideration of this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Michelle N. Black", with a stylized flourish at the end.

Michelle N. Black

Exhibits:

- A. Report of General Manager No. 14-062, March 5, 2014
- B. Minutes of Board of Recreation and Park Commissioners Meeting, April 2, 2014
- C. Letter from Friends of Griffith Park to M. Martin, May 22, 2013
- D. Letter from Friends of Griffith Park to P. Davis, January 22, 2014
- E. Letter from Sierra Club – Angeles Chapter, Griffith Park Task Force, March 16, 2014