

**EXHIBIT A**

REPORT OF GENERAL MANAGER

**APPROVED**

NO. 14-062

DATE March 5, 2014

APR 02 2014

C.D. 4 and 13

BOARD OF RECREATION  
1 PARK COMMISSIONERS

BOARD OF RECREATION AND PARK COMMISSIONERS

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

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

*Neh Israel*  
General Manager

Approved \_\_\_\_\_ Disapproved \_\_\_\_\_ Withdrawn \_\_\_\_\_

RECOMMENDATIONS:

That the Board:

1. Review, consider, and adopt the Initial Study/Mitigated Negative Declaration (IS/MND), on file in the Board office and on the Department of Recreation and Parks (RAP) website, www.laparks.org, for the proposed Griffith Park - Performing Arts Center (W.O. #E170202A) project, finding that all potentially significant environmental effects of the project have been properly disclosed, evaluated and mitigated in compliance with the California Environmental Quality Act (CEQA) and the State and City CEQA Guidelines, and that the IS/MND reflects the RAP's independent judgment and analysis;
2. Review, consider, and adopt the Mitigation Monitoring Program in Chapter 5 of the IS/MND that specifies the mitigation measures to be implemented in accordance with the CEQA Guidelines (Section 15407(d));
3. Grant conceptual approval of the proposed project, as described in the IS/MND; and,
4. Direct staff 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 adopting the IS/MND.

## REPORT OF GENERAL MANAGER

PG. 2

NO. 14-062

### 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 RAP. In 2009, the City designated Griffith Park as Historic-Cultural Monument (HCM) No. 942. The project site is located adjacent to the old Los Angeles Zoo area. The proposed Griffith Park - Performing Arts Center (W.O #E170202A) project would include the construction of the outdoor performing arts stage and associated improvements to be constructed in two (2) phases. The first phase will include construction of a 45 foot by 45 foot stage with two (2) artistic overhead structures, undergrounding of existing utility lines, and renovation of existing restrooms for Americans with Disabilities Act (ADA) compliance, installation of lighting, and ADA picnic and viewing areas. The second phase will include installation of an ADA-compliant prefabricated modular pedestrian bridge, ADA improvements to paths, installation of path lighting, refurbishment of existing stairs, and ADA parking improvements. Electrical connections would be provided, but no permanent sound amplification equipment or speakers would be installed as part of the project. Lighting fixtures would be installed solely to provide safety and security and would be in a rustic or rural style in keeping with the existing visual character of the Old Zoo area and Griffith Park in general.

In accordance with the requirements of the California Environmental Quality Act (CEQA), a IS/MND was prepared for the project. The IS/MND, which was based on an Initial Study, determined that all potentially significant environmental effects would be mitigated to a level of less than significant. The IS/MND was circulated to all interested parties and responsible agencies for a thirty (30) day review and comments period from December 19, 2013 to January 22, 2014. During this public review period, a total of eight (8) emails and/or letters with comment on the IS/MND were received. The comments primarily addressed aesthetics, cultural resources, biological resources, noise and parking effects of the project. All comments have been addressed and incorporated into the final IS/MND for the Board's review and consideration. The comments resulted in only minor changes in the IS/MND, and these changes have been shown in the errata section of the final IS/MND. A Mitigation Monitoring Program has been prepared that specifies all the mitigation measures identified in the IS/MND, which will either reduce or eliminate the potentially significant environment impacts of the project to a level less than significant, in accordance with Section 15097 of the State CEQA Guidelines. The mitigations measure included in the IS/MND and Mitigation Monitoring Program will be implemented prior to and during construction, as applicable, to mitigate impacts.

Funding for this project will be from the Proposition K program. Assuming adoption of Final IS/MND by the Board of Recreation and Park Commissioners, Bureau of Engineering (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.

REPORT OF GENERAL MANAGER

PG. 3

NO. 14-062

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 and reviewed by Paul Davis, Environmental Specialist III, Recreation and Park; 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.

**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 Patsaouras, 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 Patsaouras, 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 Patsouras, 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 Patsouras 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 Patsouras 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

May 22, 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 Performing Arts Center for Youth

Dear Ms. Martin,

In a letter dated October 4, 2012, Friends of Griffith Park enumerated our concerns about the LVNOC process that led to our decision to decline participation as a panelist in the Prop K Performing Arts Center LVNOC. The letter also confirmed our stakeholder interest in the project and our intent to provide comments when more details were known.

We are now submitting our comments.

The process outreach to project area users has been inadequate. At the April 17, 2013 Resource Board Meeting, it was announced that the department would be meeting with the project's "two user groups," by which was meant the Independent Shakespeare Company and Symphony in the Glen. The project site's primary users are picnickers, passive recreationists, hikers and wildlife enthusiasts. These established groups have received no such courtesy, although the project proposes a fundamental change in use that will negatively impact them.

Plans for the project are vague. The rough sketches provided do not indicate the proposed structure's dimensions nor the new infrastructure and changes to existing infrastructure that will be required to support its functions. Moreover, spoken descriptions of the project continue to evolve indicating that this is a larger and much costlier project than originally stipulated. Prior to the LVNOC process, the project was described not as a stage, but as a foundation for a stage--a "concrete platform, nothing more." Clearly, this is far from the case. Moreover, component project elements have not been considered with respect to their impacts on Griffith Park. These include

provisions for parking, bridges, roads, drainage and trails. For example, when questioned about parking impacts at the second LVNOC meeting, the staff answered "parking is not in our playbook." At the same meeting, staff said it needed "to look at parking codes to see if they comply." The increased size, complexity and "moving target" nature of this project mandates a CEQA Environmental Impact Report. Only under this formal process can the project's impacts be truly evaluated.

Friends of Griffith Park supports the spirit of arts performances, such as performances which Symphony in the Glen and Independent Shakespeare Company have provided in the past, especially if they are truly free. We are concerned about the "build it and they will come" theory if a permanent stage were to be built. The type and scope of the project's potential uses have not been clearly presented. As a Prop K project, the Performing Arts Center cannot justify limiting its clients to the two dominant performance groups that are participating in the process. The facility cannot be limited to the classic arts but will be available for all types of entertainment—including for-profit corporate entertainment. There are currently no stipulations against charging admission or operating year round. The impacts of the project are far greater than have been represented.

Griffith Park is already rich in permanent stages. These include the Greek Theatre outdoor amphitheater, Griffith Observatory Event Horizon Theater, The Autry National Center Wells Fargo Theatre and Outdoor Lawn, the Los Angeles Zoo Adventure Theater, and the Los Angeles Zoo Witherbee Auditorium. Additionally, the Los Angeles Zoo has revealed its intention to create a 1000-capacity event and performance venue opening in 2015. Both the Autry and Los Angeles Zoo stages are within a short radius of the project site. The creation of a duplicative facility at the Old Zoo Picnic Area deserves extra scrutiny because of the cumulative environmental and traffic impacts it represents.

Although this is a 1996 Prop K ballot measure "specified project," the project is not mandated to be built. Conditions in the Park have changed in the 17 years since the measure passed. New factors are present which make its placement obsolete and even override the need for the project in Griffith Park. The aforementioned duplication of performance venues is one example. Another is the public's deeper understanding of and support for the role of Griffith Park in the preservation of native wildlife and ecosystems within the city. In recognition of this, the 2009 designation of Griffith Park as a City of Los Angeles Historic-Cultural Monument (#942) includes a delineation of the Park's Wilderness Zone. The Old Zoo Picnic Area is located entirely within this Wilderness Zone which is defined as a sensitive historic resource. As a consequence, CEQA-mandated environmental considerations should ultimately dictate development and/or mitigation thereof. (It should also be noted that the 1996 ballot measure does not specify that the project be built in the Old Zoo Picnic Area, only that it be built in Griffith Park).

This letter is not meant to be a thorough analysis of the negative impacts a Performing Arts Center may cause. Certainly the historic resource impacts are a key issue, as the

Old Zoo dates to 1913. As a cultural landmark, the Old Zoo has a strong personage connection with Superintendent Frank Shearer, who had forward-thinking concepts when proposing the Los Angeles Zoo, which he expressed in 1910. It is also a valuable historic resource because WPA projects were centered there in the 1930s, in the way of skillfully designed and constructed "grottos" for Zoo animals and other hardscape features. Contrary to the opinion of one of the staff members speaking of the "design" being "low-impact" from a historic-cultural perspective (at LVNOC meeting # 2), the true impact would be felt because of the "change of use" of this irreplaceable cultural landscape which should be preserved.

Biological resources are also important, along with negative impacts to passive recreation, including picnicking, hiking and nature enjoyment.

The Old Zoo Picnic Area is located in a wilderness transition zone and wildlife corridor in the low foothills of Griffith Park. Its environmental significance is scientifically distinguished, as it is designated as a Significant Ecological Area in the County of Los Angeles General Plan. Technical Supplement E, "Significant Ecological Areas/Habitat Management Areas in Los Angeles County" (E-21) the Plan states in part:

*Griffith Park lies at the eastern end of the Santa Monica Mountains. It supports the coastal sage shrub, chaparral, riparian and southern oak woodland plant communities that are typical in the interior mountain ranges of Southern California. What makes Griffith Park important is its geographical location. It has become an island of natural vegetation surrounded by urban and suburban development. These isolated areas are important in preserving and documenting the geographical variability of vegetation and wildlife that formerly occurred throughout the region. They serve as reservoirs of native species that could be of scientific and economic value in the future... in the case of Griffith Park this function is made even greater than might be expected because it serves as a corridor for any gene flow and species movement... between the Santa Monica and San Gabriel Mountains via the Verdugo Mountains.*

Because of its relative seclusion, seasonal stream, mature tree canopy (including protected native species) and close proximity to the Park's higher, wilder reaches, the rare gray fox, as well as deer, bobcat, other mammals and avian species have been documented in the Old Zoo area. For example, in 2007, Griffith Park Natural History Survey biologists found "the distribution of the gray fox in Griffith Park appears to be restricted to a small area within the park. We found evidence of gray fox in only one localized area within the Old Zoo study area." In 2009, they recorded Griffith Park's "highest bat species diversity and detection frequency rates" in "the Central Area of the park (which includes the Old Zoo), where six species were found."

Negative impacts on wildlife from sound projecting towards the canyons and then echoing into the highest reaches above the Old Zoo must be considered. No doubt sound impacts are cumulative, considering Zoo events, Greek events, and Autry events.

Sound also shatters the peace for hikers, such as the Sierra Club night hikers who start out very near the Old Zoo area. Negative impacts fall upon other passive recreationists, including picnickers. Impacts on the current users include loss of a quiet experience, potential displacement, and congested traffic and parking.

Griffith Park is the place Angelenos come to leave the city behind. We are kindly presenting our current observations, asking that the appropriate level of review is completed. As currently proposed, we feel this project has sufficient potential negative impacts to warrant a review through a full Environmental Impact Report. Only then can we assure that the full impact of the project on Griffith Park and its many visitors has been disclosed.

Respectfully,

A handwritten signature in cursive script, appearing to read "Gerry Hans", written in black ink.

Gerry Hans  
President



**EXHIBIT D**



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

January 22, 2014

Paul Davis, Environmental Specialist  
Department of Recreation and Parks  
221 N. Figueroa Street, Suite 100  
Los Angeles, CA 90012  
Fax: (213) 202-2611

Re: PRJ20658 NG-13-404-RP  
Griffith Park Outdoor Performing Arts Center  
Proposition K

Dear Mr. Davis:

We submit these comments on behalf of Friends of Griffith Park (FoGP). Friends of Griffith Park is a non-profit charitable group concerned about the sustainability of Griffith Park as a regional park where nature can be enjoyed by future generations, and where the balance of recreational opportunities, the arts, and a thriving ecosystem must be met. For this reason, FoGP has been active and interested in the City's process to create a performing arts stage in the Old Zoo area of Griffith Park. The project is described as an open air outdoor stage measuring 45 feet by 45 feet on a landscaped grassy part of Griffith Park known as the Old Zoo area. The proposed project includes other ancillary improvements such as a new switchboard, resurfaced parking lot, improvements to existing restrooms, path lighting, resurfaced walkways, a new path and bridge meeting Americans with Disability Act (ADA) requirements, and under-grounding of an existing overhead power line. The land proposed for development is owned and managed by RAP.

The California Environmental Quality Act (CEQA) is intended to adequately inform 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, if they are found to be significant. (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 mitigated negative declaration (MND) prepared for the Griffith Park Performing Arts Center Project contains numerous deficiencies that prevent it from complying with CEQA. The MND 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 submitted by FoGP during the scoping period. The MND grossly understates the negative impacts which may occur, and fails to explore the significance of those impacts including developing a full range of effective mitigation measures to lessen impacts as required by law. An MND is inappropriate for a project of this scale. A full EIR is required before the Project may be approved by the City, and such EIR must fully explore alternatives which will reduce these significant negative impacts.

## **I. The MND's Project Description is Inadequate.**

A. At various public meeting the project was described as just a stage, "a platform." The use of the word "Center" in the documentation implies that the project is to be more than a simple platform stage, and indeed it is.

The proposed project is consistently described as a stage 45 feet by 45 feet. The backstage area is only mentioned twice and its dimensions of 45 feet by 30 are only given once. When the backstage area is included—as it must be—the area of the stage portion of the project is nearly doubled.

The project, no longer a platform, also now includes ornamental poles to support lights and stage sets. The overall height of the stage is now 26 to 28 feet. This is not what was initially proposed to the public at the Local Volunteer Neighborhood Oversight Committee (LVNOC) walk-through or during the initial LVNOC sessions. The scope of the project is a moving target even to this current date. Incomplete project descriptions, particularly of Phase 2, has prevented proper public disclosure and contributed to the failure to analyze and mitigate the environmental impacts.

B. The project area is described as on a grassy knoll (p. 1-9). A knoll is a small hill. The project site is exactly the opposite. It would more correctly be described as a basin, a bowl or a glen. This inaccuracy is important, as the project site's topography is important to an accurate analysis of the project's impacts, specifically with regard to noise and aesthetic impacts.

C. Because the Project is a stage whose purpose is to attract an audience, the entire area, the stage, the backstage, the lawn where the audience sits, the restrooms, pathways, parking lots, and the access must all be considered as part of the project. CEQA requires a lead agency to analyze the entirety of a project. The MND repeatedly states that the Old Zoo's WPA-built grottos are 200 feet south of project site. This is not correct. The WPA grottos are immediately adjacent to the project. Children frequently play in the old grottos while their parents watch the performance. The grottos are an integral part of the Project, and the MND must analyze any impacts on the grottos that the project may cause.

D. The Project Description is deficient because it does not make clear the primary purpose of the Project. The MND states:

The following objectives have been developed for the proposed project:

- Provide a permanent stage area to accommodate the existing known events that occur annually on the project site and allow for any other future events in a safe, orderly, and accessible location that can be monitored by RAP and permitted by the City.
- Provide improvements to allow for enhanced ADA -accessibility and access to the site.
- Maintain the natural landscape and minimize the disturbance of surrounding area as much as possible in order to remain in character with the historic designation of Griffith Park and in consideration of the natural wildlife areas in the site.

However it was clearly stated at all the LVNOC meetings that the purpose of the stage was to spare the two major users of the proposed project the expense and inconvenience of having to set up a portable stage. Symphony in the Glen is only scheduled to use the site for one night in September. Setting up a portable stage once a year most certainly impacts the area less than the negative impacts this large-scale project imposes.

Shakespeare in the Park plans to use the stage four nights a week from June 20 to Labor Day weekend. While the storage area provide convenience for equipment and prop protection, in the past most of the

sets have remained in situ during their season. Thus the set-up expense relates mainly to one pre-season set-up job and one post-season tear-down job. Therefore the relative negative environmental impacts comparing the proposed project to the current situation for the two groups is vastly worse.

E. The MND states that the project would promote free events. (p. 1-2) However a subtle but significant change in the adopted Griffith Park Vision was quietly made at the last minute in December, 2013. Referring to Independent Shakespeare Company plays p. 24 was changed from “are free of charge” to “can be attended free of charge.” This recognizes that if park users want to sit in the back, the plays would be free, but if park users want to sit in the front, they would pay. The Shakespeare in the Park events aren't as free as the company would like you to think. Thus, if the project is built and used for Independent Shakespeare Company plays, the City would be improperly using Proposition K funding to fund private entity projects in the park.

F. The MND also states that Shakespeare in the Park is a non-amplified event. It is likely that the MND's conclusions about noise and recreational impacts are based on the project's use for non-amplified events. However according to *LA Stage Times*, August 15, 2013, (Attached. Highlighted near the end of the article.) the Independent Shakespeare Company (ISC) plans to accommodate 5,000 attendees and will probably add floor miking so that people in the back can better hear performances. From their own description, the company plans to add amplified sound. Further, the project description states that while the current users of the Old Zoo area do not bring in amplified sound, future users may bring in amplified sound. The MND does not disclose, analyze, or mitigate the impacts of amplified sound. The noise, recreational, and biological impacts of amplified sound in this sensitive ecological area must be studied in an EIR prepared for the project.

G. At LVNOC meetings, Shakespeare in the Park people asked for a concession stand. The company's plan is clearly to expand the Old Zoo stage area into a full entertainment venue much like the Greek Theatre which is located approximately one mile southwest of the project. While the Greek is a large venue, it is located on the fringe of the park, not in a central wilderness area. Perhaps this level of activity would be better suited to another location in the city such as Grand Park downtown which already has a fully developed facility that is already ADA accessible and is looking for performers. An EIR would provide the City an opportunity to analyze alternatives to the project site that would avoid the potentially significant environmental impacts of placing a Greek Theatre-style venue in the Old Zoo area.

H. The number of parking spaces required for a new venue is usually based on the number of seats the venue holds. How has the City calculated the number of parking spaces required for this project, given that the MND does not disclose its capacity? Given the goal of attracting 5,000 attendees, FoGP suggests that the 5,000 attendee figure be used as a basis for determining parking requirements. Any smaller number would likely result in parking scarcity in the park.

## **II. The Project's Impact on Aesthetics is Significant.**

The proposed project would be located in Griffith Park, in the eastern range of the Santa Monica Mountains. The project site is in the Old Zoo, which is part of the Green Park Corridor area of Griffith Park (RAP, 1978). The manicured lawn area of the project site has partial views of the Santa Monica Mountains to the north and west.

A. The MND reports that the project would “slightly alter the visual character of the project” (p. 2-5), but concludes that the project will not have significant aesthetic impacts. This assessment is incorrect. Since

there is currently no structure whatsoever in the central area of the project site, the addition of the stage structure will have a great impact on the aesthetics of the project site. It will become the dominant feature of the area. The bridge will be aesthetically obtrusive, unsightly and severely out-of-context with the surrounding natural environment. Arriving visitors will be looking directly at the rear of the stage, a six-foot wall, and the backstage area, when they enter the Old Zoo Picnic Grounds. The stage is located such that it is the very first thing visitors will see and will dramatically alter a visitor's first impression of the picnic area. The stage will also detract from the historic WPA grottos that are integral with the project site on its southern edge. An EIR is required to assess the project's significant aesthetic impacts on the historic Old Zoo site.

B. The MND relies upon the site's dense vegetation to screen views of the bridge and the stage from other areas of the park and for minimization of impacts to views within the Old Zoo site. However, the MND fails to acknowledge whether any of these trees will need to be removed during any site grading or during construction of the stage, bridge, or during undergrounding of the existing overhead power line, or if any trees will be affected.

C. Furthermore, since there is currently no lighting in the Old Zoo area, the addition of any lighting, however minimal, will have a great impact on the aesthetics of the project site, whether the lights are switched on or off. The MND contains no analysis or mitigation of the project's lighting impacts.

D. In addition to its large size, the stage structure itself, by its very nature, will be a graffiti magnet. Graffiti would have significant adverse aesthetic impacts, as well as adverse impacts on the recreational value of the site. Who will be responsible for seeing that the graffiti is removed promptly? Will each user of the stage be responsible for removing the graffiti? The Department of Recreation and Parks maintenance staff has been stretched so thin with the budget cuts that they cannot keep up with the removal of graffiti that occurs in the park now. They cannot possibly be expected to keep the new stage free of graffiti. Without enforceable mitigation that requires stage users or the Department to immediately remove graffiti, the new structures will have adverse impacts on aesthetics that must be analyzed in an EIR.

### **III. The Project's Impacts on Biological Resources Impacts are Significant.**

The MND contains is inadequate disclosure and analysis of biological resources at the site, understates the project's significant negative impacts, and fails to suggest adequate mitigation measures which can reduce those impacts. Without an adequate analysis, the likely adverse biological impacts on Griffith Park and the Santa Monica Mountains cannot be mitigated to a level below significant. An EIR is required.

A. The Old Zoo project site is a Significant Ecological Area. Yet information needed by the public is obscured by the following statement on P. 2-34, saying, "the majority of Griffith Park is within a Significant Ecological Area (SEA) 37; however the project site is 70 feet west of and outside of the SEA." Unless the MND meant to note that the proposed stage is "east" instead of "west" of the SEA border, it contains incorrect information. Also, the County has proposed new SEA borders that are even more proximal to the site than that of the current border. Even though the stage itself may not occur within the SEA border, the audience would be well beyond 70 feet of the stage. Since the purpose of the stage is to attract an audience, one must include the audience seating area as part of the project. The audience would be sitting within the zone of the SEA. Placing 2500 people in a SEA four nights a week throughout the summer months is not an appropriate use of a SEA and would intimate that there would be significant impacts on sensitive ecological resources that inhabit the area. According to *LA Stage Times*,

August 15, 2013, (See attached.) Shakespeare in the Park plans to increase its attendance from 2500 per event to 5000. The placement of 5000 people in and near the SEA on most summer evenings would have even greater impacts.

B. Sound impacts wildlife and is understated in the MND. Because of the expectations of larger audiences, a plan to install floor microphones to amplify the sound is already in place. The amplified sound would have a negative impact on the wildlife that rely on quiet evenings to locate prey or avoid predators. Larger, future events would add even more sound impact on wildlife. As the project does not limit the number of events that are permitted each year, the MND should have analyzed nightly impacts to species. Performers at the proposed project would bring their own equipment, which may be much louder than the equipment that is currently used for Old Zoo area performances. Sonic impact of this magnitude in an interior park wildlife area such as the Old Zoo not only has repercussions on various wildlife types, it may impact the entire ecosystem.

The rapidly growing problem of human-produced noise has initiated much scientific research relating to its effects on wildlife over the last couple decades. There is universal agreement that noise can affect an animal's behavior and physiology over a wide variety of species. When stressed by noise, an animal's reproductive success, energy budget, and long-time survival is jeopardized. The scientific literature documents avoidance and abandonment behavior, such as birds being flushed out of nests breaking eggs or exposing young to predators. Acoustical masking has been shown to interrupt species-specific signals across a wide range of wildlife. Man-made sounds probably affect animals in many other ways that we have not yet recognized. The MND fails to disclose, analyze, or mitigate these impacts. An EIR is required.

C. Light spillage from the site during events 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 MND also fails to adequately consider the cumulative disruption to wildlife that would result from lighting the stage area, rest rooms, pathways, bridges and parking lot areas, in violation of CEQA. (See, *The Ecological Consequences of Artificial Night Lighting*, Travis Longcore and Catherine Rich, 2006.)

D. The Biological Technical Report is insufficient. Table 2-5, special-status species, fails to list Western Red Bat (*Lasiurus blossevillii*) and fails to cite the Griffith Park Bat Survey of 2009 (Remington-Cooper), where three special-species bats were confirmed in the general Old Zoo area itself. The reconnaissance conducted for this MND was at an opportune time (December) to find no evidence of bats. The MND ignores scientific work that confirms presence of the bats. According to the Remington-Cooper study, the "highest bat species diversity and detection frequency rates were in the Central Area of the park where six species were found." Central Area surveys were mostly conducted at the Old Zoo. Accordingly, an EIR should be prepared that discloses, analyzes, and mitigates any threats to special status bat species that frequent the Old Zoo area.

E. Stated mitigation measures for bats and nesting raptors are inadequate, impossible and/or impractical. For example, raptors regularly nest in the Old Zoo area. Given the size of the project area, FoGP wonders if a 500-foot buffer is even possible during construction. More important, the MND contains no mitigation measures for nesting raptors after construction is complete. Why not? The permanent disturbance from 2500-5000 people may be more disruptive to foraging or nesting raptors than the temporary disturbance of construction. Finally, the suggested mitigation of a

buffer during event periods seems both impossible and impractical. If a buffer is to be established during event periods, more information on such a buffer is required so that its efficacy may be evaluated.

F. The MND understates use of this area by wildlife and its importance to connectivity. The Biological Technical Report fails to cite Mathewson-Spehar (2007), "the distribution of the gray fox in Griffith Park appears to be restricted to a small area within the park. We found evidence of gray fox in only one localized area within the Old Zoo study area." The rarity of gray fox in this section of the Santa Monica Mountains makes this transitional wildlife corridor worth saving. Because of this area's relative seclusion, seasonal stream, mature tree canopy and close proximity to the Park's higher reaches, the rare gray fox, as well as deer, bobcat, a mountain lion and other mammals, plus many important avian species have all been documented in the Old Zoo area.

G. The negative biological impacts of a new large bridge and paths is not explored as part of the MND and the Biological Technical Report. The impacts on an ephemeral stream, multiple construction risk impacts, and wildlife movement are all subjects not disclosed or analyzed. Phase II must be considered as part of the project, per CEQA.

#### **IV. The Project's Impacts on Cultural Resources Impacts are Significant.**

A. Although the Cultural Resources Report mentions some of the historic personages who were included in Griffith Park's Historic-Cultural Monument Application, the report failed to note Park Superintendent Frank Shearer who had a great influence on how Griffith Park looks today and whose vision of a zoo in the park was implemented in what is now referred to as the Old Zoo. In January 1910, the Parks Department hired the young Scotsman, who was trained at the Royal Botanical Gardens of Edinburgh, as a landscape engineer and draftsman. The Department was so impressed with his skill that by May of the same year, Shearer was named acting Superintendent and soon after became Superintendent. It was he who had the idea to convert Fern Dell's stream-fed ravine into a setting for exotic and native ferns. Fern Dell became one of the most popular places in Los Angeles to visit in the 1920s and 1930s. It was also Shearer who had the vision for a zoo in Griffith Park. The following quote from Shearer was in the *Los Angeles Herald* on October 11, 1910.

*There Is a splendid opportunity for the Introduction and maintenance of a zoo of magnificent proportions, as there are canyons and slopes of every Imaginable size, shape, aspect and climatic conditions. The necessary barriers for the various species that comprise the zoo could be skillfully concealed among the trees and shrubs growing on the different slopes, giving to the visitor the Impression that the Inhabitants of the zoo have each selected a habitat and are there through natural inclination.*

Legendary Parks Superintendent Shearer started the construction of his vision for a Zoo in 1913. The bear pits were built by 1200 unemployed men in 1914. Yet he gets no credit in the Cultural Resources analysis. His importance to Griffith Park continued through the twenties and thirties, and he was present in the field the day of the 1933 Great Fire that killed 33 WPA workers. The MND's omission of information about Frank Shearer deprives the cultural analysis of critical information.

B. The MND is deficient in its analysis of the WPA projects in the Old Zoo and downplays the importance of these WPA projects. During the Great Depression, the WPA created new elk and deer

paddocks, new lion and bears grottos, and other zoo buildings. The analysis did not even include the WPA project plans that are in the Department of Recreation and Parks own archives and are readily available. They have plans for WPA Project 1713 File 10-38 (398), October 29, 1936, for the large and small bear grotto in the Griffith Park Zoo. (See attached.) Friends of Griffith Park has requested that the Department scan these plans and send them to you to be added to the project file.

The Cultural Resources report made no attempt to get the complete files on the WPA work in the Old Zoo. Some of these records are available in the San Francisco office of the National Archives and Records Administration. Most of the records are housed in the Archives Reference Section (NWCT2R), National Archives and Records Administration, 8601 Adelphi Road, College Park, MD, 20740-6001. (301) 837-3510. <http://www.archives.gov/contact/inquire-form.html>.

While the project does not plan to touch these historic WPA grottos, it will certainly change the aesthetics of the site. The first impression visitors, picnickers and hikers currently have when they walk up the steep path or take the stairs is a broad open view of the entire site. The wonderful work of the WPA grottos is immediately visible as is the entire glen with a view up to Bee Rock. It is exactly as Frank Shearer imagined it to be in his interview with the Los Angeles Herald in 1910. "...giving to the visitor the *Impression that the Inhabitants of the zoo have each selected a habitat and are there through natural inclination.*" With the addition of the stage and the backstage area right at the top of the path, visitors will now be looking at a six-foot wall 45 feet long with 28-foot poles on top of it. One of the designers said it would look like a garage door. This represents a drastic change in the aesthetics of the charming Old Zoo Picnic Area, with impacts to its historical nature. One must remember that during the day this is a popular picnic area. Picnickers will be greatly impacted by the change in the aesthetics of the picnic area.

The Old Zoo area also contains important Civilian Conservation Corps projects of historic and cultural significance. CCC projects in Griffith Park were under the supervision of Louis Brandt, Associate Landscape Architect. CCC workers were housed at Griffith Park Camp, WC-2. They constructed "excellent stone lined drainage channels." (Source: monthly narrative reports by Louis Brandt.) Some of these drainage channels are located in the Old Zoo area and continue to function well today.

C. The Cultural Resources report neglected to mention that the idea for a zoo in the Park dates to 1896. Col. Griffith co-owned an Ostrich Farm located in Park Center, in the same general area as the Old Zoo. The 1896 Ostrich Farm featured a small collection of birds, a menagerie, trails, and an elaborate picnic area. It was from this small menagerie at the Ostrich Farm that Col. Griffith developed the idea for a zoo in Griffith Park. This omission is important as it confirms that even at the time Col Griffith donated land to the City, a public zoo was already on the drawing board. The Old Zoo is a memorial to a major goal to provide a natural setting for the public to gather to view animals from around the world.

D. While the Cultural Resources report includes the founding of missions and of the City of Los Angeles in 1781 seven miles away, it failed to mention the Juan Bautista de Anza Expedition of 1775. The members of the expedition walked along the Los Angeles River where it passes through Griffith Park. They camped at the bend in the river where the Zoo and the Autry Museum are currently located. Because of the size of the expedition, they would have walked through the lower part of the Old Zoo where the bridge is to be constructed. One of the soldiers on the Anza expedition was Jose Vicente Feliz who later received Rancho Los Feliz. The Feliz Adobe built in 1853, City of Los Angeles HCM # 401, declared November 30, 1988, is situated just east of the project site. The project's aesthetic impacts would reduce the cultural value of the site, a significant impact that requires analysis in an EIR.



**V. The Noise Report is deficient and inaccurate.**

A. The noise report is based on the fact that the proposed uses -- Shakespeare in the Park, Symphony in the Glen, and Haunted Hayride -- already exist in the Old Zoo area so the noise level would not increase substantially. The report omits the fact that no evaluation of the impacts of these uses was undertaken *before* they were allowed in the park. Therefore there is no record of the impact these events have already had on the tranquility of the project site. The baseline for CEQA analysis should be the Old Zoo area without a performance space or the Haunted Hayride event.

While the Old Zoo is a popular picnic area in the daytime, in the evening it used to be relatively free of human presence. This is no longer true during the summer and fall. In fact, complaints of echoing sound through the nearby canyons have been made by hikers, especially during the Haunted Hayride event period. The introduction of noise into an area people visit specifically to find tranquility is a significant noise impact as well as a significant recreational impact that must be studied and mitigated under CEQA.

A study should be made of the noise levels on a winter or spring evening when events are not scheduled. This would provide a baseline noise level from which to evaluate the true noise impacts these events have in the park. The fact that a noise analysis was not done when it should have been done, prior to permitting performances in the park, is no excuse for not doing it now. Baseline noise levels must be based upon noise before any of the three events were instituted.

The MND admits that “the stage could alter the perceived tranquility of the natural areas immediately surrounding that are used for passive recreation (picnicking, hiking and wildlife observation) while in use due to noise and potentially increased audience during the performance.” (P. 2-57 “Perceived tranquility” is a strange choice of words given that the Old Zoo is very tranquil in the evening when there is no performance. It further admits that future events could have amplified sound. With performers bringing in their own sound equipment, RAP may have little to no practical control over the decibel levels during performances.

According to *LA Stage Times*, August 15, 2013, (See attached, highlighted at the end of the article.) Shakespeare in the Park plans to increase its attendance from 2500 per event to 5000. Because of the increased audience, they also plan to install floor microphones to amplify the sound so that people in the rear can hear. This increase in noise level was not evaluated and must be.

During construction, particular attention must be paid to noise levels because of the sensitive receptors in Shane’s Inspiration Playground, which is specifically designed to serve handicapped children. Studies have shown that children are more sensitive to noise, and adequate mitigation must be developed if Shane’s Inspiration Playground will be impacted.

**VI. The Recreation Report Is Deficient.**

A. Throughout the MND the proposed recreational activities are described as already existing. This is used to justify statements that the project will not increase noise, traffic, or any other potential project impacts. Then on p. 2-48, the MND states that “Although that target year has passed, the project nonetheless serves the purpose of creating new recreational activities for the City, which would be consistent with goals of the plan. Therefore, this impact would be less than significant.” The MND cannot state both that these recreational activities already exist and that it creates new recreational activities. Either way, the MND relies upon a flawed baseline for impact analysis.

The MND recognizes the nearby Greek Theatre, LA Zoo, and Autry National Center (p.1-6.) They all have performance centers as does the Visitor Center and other venues in Griffith Park. The Autry is also planning an outdoor stage on its lawn.

Given the availability of numerous nearby venues, is there a need for another stage in Griffith Park? Perhaps a performing arts stage would be better suited in a city park that has no stage to provide recreational opportunities to those neighborhoods that are lacking in recreational activities. Alternative locations to better serve the public and to reduce environmental impacts should be explored in an EIR.

B. The proposed stage has the potential to displace picnickers who have enjoyed the use of the Old Zoo during the day for picnicking since the 1960s. The current performers use the area in the evening and early evening. However there is nothing in the proposed project that restricts a performer's use of the stage during the day or that limits the number of events in a day, week, month, or year. This has great potential to eliminate the Old Zoo site as a picnic area entirely.

Picnickers and hikers, including Sierra Club hikers, are already displaced from the site during the Haunted Hayride. Besides being displaced during the entire month of October while the Haunted Hayride is going on, they are also restricted from the area for approximately two weeks before the Haunted Hayride while it is being set up and for approximately two weeks after the event for tear down and load out. The facility is already unavailable to picnickers for 1/6 of the year.

The MND states that RAP "would only permit new uses that would not substantially deteriorate the existing project environment or its surroundings in Griffith Park." (P. 2-77) This is an entirely disingenuous statement given that RAP has permitted the Los Angeles Haunted Hayride to operate for several years in spite of the damage done to the environment. They have covered much of the "manicured grassy area" leaving it bare and subject to erosion.

Phase 2 of the project requires the construction of a bridge to meet the requirement for ADA access to the new stage. The bridge as currently proposed cuts across the existing picnic area in the lower Old Zoo Picnic Area. This will limit the use of the area to smaller groups. Larger groups' space would be cut in half by the bridge. The MND also fails to acknowledge or mitigate the cumulative impact this project will have on large group picnicking if the Crystal Springs Ballfields project eliminates other large group picnic sites in Crystal Springs.

C. Conversion of regular park patron parking to ADA parking (unspecified number at this time) may decrease the regular accessibility to picnic grounds at times when performance events are not occurring. Depending upon the number of required ADA spaces, a large amount of the current proximate parking spaces may need to be converted. If replacement spaces are not provided, parking and traffic may also adversely impact recreational use of the Old Zoo area.

## **VII. The Transportation and Traffic Report is Inadequate and Deficient.**

A. The Traffic Report is based on the fact that the proposed use (Shakespeare in the Park, Symphony in the Glen, and Haunted Hayride) already exists in the Old Zoo area so the traffic level would not increase substantially. Again, the report fails to acknowledge that no evaluation of the impact of these uses was undertaken *before* they were allowed in the park. Therefore there is no record of the impact these events

have already had on the traffic levels. The evaluation of the impact of traffic needs to be based on the evening traffic that existed in the area *before* these uses arrived.

B. According to *LA Stage Times*, August 15, 2013, (See attached.) Shakespeare in the Park plans to increase its attendance from 2,500 per event to 5,000. The Traffic Report did not take into consideration an evaluation of the impact on traffic when the number of attendees is doubled. Such an evaluation should occur in an EIR.

C. The possible future events added to the three existing events is unknown. However since there will certainly be additional events at the site, and since no limits on project use are included in the project, the report must include them in an evaluation of the impact on traffic.

### **Conclusion**

As detailed above, the proposed performing arts stage project will have significant impacts on the Old Zoo area that require preparation of an Environmental Impact Report. FoGP looks forward to working with the City to ensure that Griffith Park is properly managed to protect its unique cultural, recreational, and biological resources.

Sincerely,



Gerry Hans  
President  
[gerry@friendsofgriffithpark.org](mailto:gerry@friendsofgriffithpark.org)

Attachment #1 (following page): *LA Stage Times*, August 15, 2013

Note: Old Zoo plans, including WPA drawings, to be sent by RAP Planning Division.

## LA STAGE TIMES

### **ISC Grows New Theatergoers in Griffith Park With 'Free' Shakespeare**

by Evan Henerson | August 15, 2013

In the middle of July, Tal Josef went to Griffith Park to see a production of the Independent Shakespeare Company.

The name of the play? "I don't remember," she admits. "I didn't really pay attention." Which draws a laugh from her boyfriend and fellow restaurant worker Kyle Jordan.

"She had come back from the play, and said 'I think we have something to do on a Sunday night, a great date night experience for us. They do Shakespeare in the park in Griffith,'" recalls Jordan. "I said, 'OK, what did you see?' She said, 'I don't know.' I said, 'What are they going to show next time?' She said 'I don't know.' I said 'Do you want to go again?' She said, 'Yes, I do. Very much.'"

Let the record reflect that Josef went solo to ISC's Griffith Park Free Shakespeare Festival, but took in the only non-Bard offering in the three-play repertory — Oliver Goldsmith's *She Stoops to Conquer*. She brought Jordan back for a Sunday night performance of Shakespeare's *Macbeth*, but really the night's bill of fare was largely beside the point.

"I liked the vibe, the atmosphere. It was calming. Nice," says Josef.

Josef and Jordan's tale is not atypical among the ever-expanding crowds who make their way to the site of the Old Griffith Park Zoo during the 10 weeks from June to September, when ISC is performing. They park near the Shane's Inspiration playground — if they're early enough to still nab a space — or farther away by the carousel if the lots are jammed. They follow the burgundy-and-white-arrowed signs directing them to "Free Shakespeare" and trudge up a hill to a grassy, open-air glen, where a simple stage is erected every summer. They bring folding chairs, blankets and every imaginable variety of snacks or picnic provisions. They come with babies, dogs and friends from out of town. They don't have tickets because — unless you want to carve out some prime reserved seating obtained through Goldstar Events — you don't need one. Admission is free. No one is turned away.

Some stumble in after hearing about the activity during a nature hike. Others might be in the park for another reason, hear the noise and stop by — occasionally even in mid-performance — to check things out.

Others plan. Two years ago, Jonathan Lee and his wife Yvette brought their then-10-year-old twins Ronen and Keren to an ISC production of *Hamlet*. Returning this year for *Macbeth*, they again prepared by reviewing the plot with their kids.

"After *Hamlet*, I posted on Facebook and Yelp. I was really enthusiastic about it," says Jonathan Lee, a librarian. "It's a great introduction. The fact that you're outdoors is a benefit, and it doesn't in any way detract from the experience. You're not in a formal theater setting."

While some ISC patrons are regular Los Angeles theatergoers who may subscribe to Center Theatre Group or the Pasadena Playhouse, many say the last time they went to a live staged performance before ISC was in high school. Now they can't get their fill of ISC's unique, all-inclusive brand of free Shakespeare.

And they come back, often to see the same play multiple times during the same season. Some come late. Others leave early. Still others stay to mingle and chat up cast

**EXHIBIT E**

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 you 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