III. Responses to Comments
III. Responses to Comments

A. Introduction

CEQA Guidelines Section 15088(a) states that “The lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response. The lead agency shall respond to comments that were received during the notice comment period and any extensions and may respond to late comments.” In accordance with these requirements, this Section of the Final EIR provides responses to each of the written comments received regarding the Draft EIR. Table III-1 on page III-2 provides a summary of the issues raised by each Commentor in response to the Draft EIR.
### III. Responses to Comments

#### B. Comment Matrix

<table>
<thead>
<tr>
<th>LETTER NO.</th>
<th>SUMMARY OF WRITTEN COMMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Scott Morgan, Director</td>
</tr>
<tr>
<td></td>
<td>State of California</td>
</tr>
<tr>
<td></td>
<td>Governor's Office of Planning and Research</td>
</tr>
<tr>
<td></td>
<td>State Clearinghouse and Planning Unit</td>
</tr>
<tr>
<td></td>
<td>1400 Tenth Street</td>
</tr>
<tr>
<td></td>
<td>P.O. Box 3044</td>
</tr>
<tr>
<td></td>
<td>Sacramento, California 95812-3044</td>
</tr>
</tbody>
</table>
### Table III-1 (Continued)

**Responses to Comments Matrix**

<table>
<thead>
<tr>
<th>LETTER NO.</th>
<th>SUMMARY OF WRITTEN COMMENTS</th>
<th>PROJECT DESCRIPTION</th>
<th>ENVIRONMENTAL SETTING</th>
<th>AESTHETICS/VISUAL RESOURCES</th>
<th>AIR QUALITY/GHG</th>
<th>BIOLOGICAL RESOURCES</th>
<th>CULTURAL RESOURCES</th>
<th>GEOLOGY AND SOILS</th>
<th>HAZARDS AND HAZARDOUS MATERIALS</th>
<th>HYDROLOGY/WATER QUALITY</th>
<th>LAND USE</th>
<th>NOISE</th>
<th>TRAFFIC, CIRCULATION &amp; PARKING</th>
<th>WASTEWATER</th>
<th>WATER</th>
<th>ENERGY</th>
<th>SOLID WASTE</th>
<th>FIRE PROTECTION</th>
<th>ALTERNATIVES</th>
<th>OTHER ENVIRONMENTAL CONSIDERATIONS</th>
<th>GENERAL SUPPORT</th>
<th>GENERAL OPPOSITION</th>
<th>OTHER</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>Scott Morgan</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Director, State Clearinghouse</td>
<td>1400 10th St.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>P.O. Box 3044</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Sacramento, CA  95812-3044</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Edmund Pert, Regional Manager</td>
<td>South Coast Region</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>California Department of Fish and Game</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>4949 Viewridge Ave.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>San Diego, CA  92123</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Dave Singleton, Program Analyst</td>
<td>Native American Heritage Commission</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>915 Capitol Mall, Rm. 364</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Sacramento, CA  95814</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Eric Bruins</td>
<td>Mountains Recreation and Conservation Authority</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>5810 Ramirez Canyon Road</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Malibu, CA  90265</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:eric.bruins@mrca.ca.gov">eric.bruins@mrca.ca.gov</a></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

**City of Los Angeles**

**Forest Lawn Memorial-Park–Hollywood Hills Master Plan**

SCH. No. 2008111048

January 2012
### Table III-1 (Continued)
#### Responses to Comments Matrix

<table>
<thead>
<tr>
<th>LETTER NO.</th>
<th>SUMMARY OF WRITTEN COMMENTS</th>
<th>PROJECT DESCRIPTION</th>
<th>ENVIRONMENTAL SETTING</th>
<th>AESTHETICS/ VISUAL RESOURCES</th>
<th>AIR QUALITY/ GHG</th>
<th>BIOLOGICAL RESOURCES</th>
<th>CULTURAL RESOURCES</th>
<th>GEOLGY AND SOILS</th>
<th>HAZARDS AND HAZARDOUS MATERIALS</th>
<th>HYDROLOGY/ WATER QUALITY</th>
<th>LAND USE</th>
<th>NOISE</th>
<th>TRAFFIC, CIRCULATION &amp; PARKING</th>
<th>WASTEWATER</th>
<th>WATER</th>
<th>ENERGY</th>
<th>SOLID WASTE</th>
<th>FIRE PROTECTION</th>
<th>ALTERNATIVES</th>
<th>OTHER ENVIRONMENTAL CONSIDERATIONS</th>
<th>GENERAL SUPPORT</th>
<th>GENERAL OPPOSITION</th>
<th>OTHER</th>
</tr>
</thead>
<tbody>
<tr>
<td>6</td>
<td>Antonio Gonzalez, Chairperson</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Santa Monica Mountains Conservancy</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Ramirez Canyon Park</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>5750 Ramirez Canyon Road</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Malibu, California 90265</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>Anthony E. Vyinih</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Assistant Deputy Director</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Land Development Division</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>County of Los Angeles</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Department of Public Works</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>900 S. Fremont Ave.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Alhambra, CA 91803-1331</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td><a href="http://dpw.lacounty.gov">http://dpw.lacounty.gov</a></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>Ali Poosti, Acting Division Manager</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Wastewater Engineering Services Division</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Bureau of Sanitation</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>City of Los Angeles</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>1149 South Broadway Street</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>10th Floor</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Los Angeles, CA 90015-2213</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Table III-1 (Continued)
Responses to Comments Matrix

<table>
<thead>
<tr>
<th>LETTER No.</th>
<th>SUMMARY OF WRITTEN COMMENTS</th>
<th>PROJECT DESCRIPTION</th>
<th>ENVIRONMENTAL SETTING</th>
<th>AESTHETICS/VISUAL RESOURCES</th>
<th>AIR QUALITY/GHG</th>
<th>BIOLOGICAL RESOURCES</th>
<th>CULTURAL RESOURCES</th>
<th>GEOLGY AND SOILS</th>
<th>HAZARDS AND HAZARDOUS MATERIALS</th>
<th>HYDROLOGY/WATER QUALITY</th>
<th>LAND USE</th>
<th>NOISE</th>
<th>TRAFFIC, CIRCULATION &amp; PARKING</th>
<th>WATER</th>
<th>ENERGY</th>
<th>SOLID WASTE</th>
<th>FIRE PROTECTION</th>
<th>ALTERNATIVES</th>
<th>OTHER ENVIRONMENTAL CONSIDERATIONS</th>
<th>GENERAL SUPPORT</th>
<th>GENERAL OPPOSITION</th>
<th>OTHER</th>
</tr>
</thead>
<tbody>
<tr>
<td>9</td>
<td>Ali Poosti, Acting Division Manager Wastewater Engineering Services Division Bureau of Sanitation City of Los Angeles 1149 South Broadway Street 10th Floor Los Angeles, CA 90015-2213</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>Michael D. Forbes Assistant Community Development Director Community Development Department City of Burbank 150 North Third St. P.O. Box 6459 Burbank, CA 91510</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Table III-1 (Continued)
Responses to Comments Matrix

<table>
<thead>
<tr>
<th>LETTER No.</th>
<th>SUMMARY OF WRITTEN COMMENTS</th>
<th>PROJECT DESCRIPTION</th>
<th>ENVIRONMENTAL SETTING</th>
<th>AESTHETICS/VISUAL RESOURCES</th>
<th>AIR QUALITY/GHG</th>
<th>BIOLOGICAL RESOURCES</th>
<th>CULTURAL RESOURCES</th>
<th>GEOLOGY AND SOILS</th>
<th>HAZARDS AND HAZARDOUS MATERIALS</th>
<th>HYDROLOGY/WATER QUALITY</th>
<th>LAND USE</th>
<th>NOISE</th>
<th>TRAFFIC, CIRCULATION &amp; PARKING</th>
<th>WASTEWATER</th>
<th>WATER</th>
<th>ENERGY</th>
<th>SOLID WASTE</th>
<th>FIRE PROTECTION</th>
<th>ALTERNATIVES</th>
<th>OTHER ENVIRONMENTAL CONSIDERATIONS</th>
<th>GENERAL SUPPORT</th>
<th>GENERAL OPPOSITION</th>
<th>OTHER</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>Jin Hwang</td>
<td>Civil Engineering Associate</td>
<td>Los Angeles Department of Water and Power</td>
<td>Water Resources Development Group</td>
<td><a href="mailto:jinhwang@ladwp.com">jinhwang@ladwp.com</a></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>Luis Nuno</td>
<td>East Valley District Water Distribution Engineering</td>
<td>LADWP—Water</td>
<td><a href="mailto:lwis.nuno@water.ladwp.com">lwis.nuno@water.ladwp.com</a></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>13</td>
<td>Charles C. Holloway</td>
<td>Manager of Environmental Assessment and Planning</td>
<td>Department of Water and Power</td>
<td>111 N. Hope St.</td>
<td>Los Angeles, CA 90012-2607</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>LETTER No.</td>
<td>SUMMARY OF WRITTEN COMMENTS</td>
<td>PROJECT DESCRIPTION</td>
<td>ENVIRONMENTAL SETTING</td>
<td>AESTHETICS/VISUAL RESOURCES</td>
<td>AIR QUALITY/GHG</td>
<td>BIOLOGICAL RESOURCES</td>
<td>CULTURAL RESOURCES</td>
<td>GEOLOGY AND SOILS</td>
<td>HAZARDS AND HAZARDOUS MATERIALS</td>
<td>HYDROLOGY/WATER QUALITY</td>
<td>LAND USE</td>
<td>NOISE</td>
<td>TRAFFIC, CIRCULATION &amp; PARKING</td>
<td>WASTEWATER</td>
<td>WATER</td>
<td>ENERGY</td>
<td>SOLID WASTE</td>
<td>FIRE PROTECTION</td>
<td>ALTERNATIVES</td>
<td>OTHER ENVIRONMENTAL CONSIDERATIONS</td>
<td>GENERAL SUPPORT</td>
<td>GENERAL OPPOSITION</td>
<td>OTHER</td>
</tr>
<tr>
<td>------------</td>
<td>----------------------------</td>
<td>---------------------</td>
<td>-----------------------</td>
<td>----------------------------</td>
<td>-----------------</td>
<td>---------------------</td>
<td>---------------------</td>
<td>------------------</td>
<td>------------------------</td>
<td>------------------------</td>
<td>----------</td>
<td>------</td>
<td>-----------------------------</td>
<td>----------</td>
<td>-------</td>
<td>--------</td>
<td>------------</td>
<td>----------------</td>
<td>------------</td>
<td>-------------------------------</td>
<td>----------------------</td>
<td>----------------------</td>
<td>-------</td>
</tr>
<tr>
<td>14</td>
<td>Tom LaBonge</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td></td>
<td>Councilmember, Fourth District</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Los Angeles City Council</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>200 North Spring Street, Room 460</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Los Angeles, California 90012-4873</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>15</td>
<td>Renee Weitzer</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td></td>
<td>Chief, Land Use Planning</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Councilmember Tom LaBonge</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:renee.weitzer@lacity.org">renee.weitzer@lacity.org</a></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>16</td>
<td>Renee Weitzer</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td></td>
<td>Chief, Land Use Planning</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Councilmember Tom LaBonge</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:renee.weitzer@lacity.org">renee.weitzer@lacity.org</a></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>17</td>
<td>Adrian Scott Fine</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td></td>
<td>Directory of Advocacy</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Los Angeles Conservancy</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>523 West Sixth St., Ste. 826</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Los Angeles, California 90014</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>
### Table III-1 (Continued)
Responses to Comments Matrix

<table>
<thead>
<tr>
<th>LETTER NO.</th>
<th>SUMMARY OF WRITTEN COMMENTS</th>
<th>PROJECT DESCRIPTION</th>
<th>ENVIRONMENTAL SETTING</th>
<th>AESTHETICS/VISUAL RESOURCES</th>
<th>AIR QUALITY/GHG</th>
<th>BIOLOGICAL RESOURCES</th>
<th>CULTURAL RESOURCES</th>
<th>GEOLOGY AND SOILS</th>
<th>HAZARDOUS AND HAZARDOUS MATERIALS</th>
<th>HYDROLOGY/WATER QUALITY</th>
<th>LAND USE</th>
<th>NOISE</th>
<th>TRAFFIC, CIRCULATION &amp; PARKING</th>
<th>WASTEWATER</th>
<th>WATER</th>
<th>ENERGY</th>
<th>SOLID WASTE</th>
<th>FIRE PROTECTION</th>
<th>ALTERNATIVES</th>
<th>OTHER ENVIRONMENTAL CONSIDERATIONS</th>
<th>GENERAL SUPPORT</th>
<th>GENERAL OPPOSITION</th>
<th>OTHER</th>
</tr>
</thead>
<tbody>
<tr>
<td>18</td>
<td>Bryce C. Lowery</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>President</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Cahuenga Pass Property Owners Association</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>P.O. Box 1655</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Hollywood, CA 90078</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>19</td>
<td>Bryce C. Lowery</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>President</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Cahuenga Pass Property Owners Association</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>P.O. Box 1655</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Hollywood, CA 90078</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>20</td>
<td>Roy P. Disney, Chairman</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Daniel Savage, President</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Richard Bogy, Vice President</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Deuk Perrin, Vice President</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Terry Davis, Secretary</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Krista Michaels, Treasurer</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Communities United for Smart Growth</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Table III-1 (Continued)
Responses to Comments Matrix

<table>
<thead>
<tr>
<th>LETTER NO.</th>
<th>SUMMARY OF WRITTEN COMMENTS</th>
<th>PROJECT DESCRIPTION</th>
<th>ENVIRONMENTAL SETTING</th>
<th>AESTHETICS/Visual Resources</th>
<th>AIR QUALITY/GHG</th>
<th>BIOLOGICAL RESOURCES</th>
<th>CULTURAL RESOURCES</th>
<th>GEOLOGY AND SOILS</th>
<th>HAZARDS AND HAZARDOUS MATERIALS</th>
<th>HYDROLOGY/WATER QUALITY</th>
<th>LAND USE</th>
<th>NOISE</th>
<th>TRAFFIC, CIRCULATION &amp; PARKING</th>
<th>WASTEWATER</th>
<th>WATER</th>
<th>ENERGY</th>
<th>SOLID WASTE</th>
<th>FIRE PROTECTION</th>
<th>ALTERNATIVES</th>
<th>OTHER ENVIRONMENTAL CONSIDERATIONS</th>
<th>GENERAL SUPPORT</th>
<th>GENERAL OPPOSITION</th>
<th>OTHER</th>
</tr>
</thead>
<tbody>
<tr>
<td>21</td>
<td>Gerry Hans</td>
<td>Friends of Griffith Park</td>
<td>P.O. Box 27573</td>
<td>Los Angeles, CA 90027-0573</td>
<td><a href="mailto:gerry@friendsofgriffithpark.org">gerry@friendsofgriffithpark.org</a></td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>22</td>
<td>Gerry Hans</td>
<td>President</td>
<td>Friends of Griffith Park</td>
<td>P.O. Box 27573</td>
<td>Los Angeles, CA 90027-0573</td>
<td>friendsofgriffithpark.org</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>23</td>
<td>Ron Ostrow</td>
<td>President</td>
<td>Greater Griffith Park Neighborhood Council</td>
<td><a href="mailto:ronostrow@ggpnc.org">ronostrow@ggpnc.org</a></td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>
### III. Responses to Comments

#### Table III-1 (Continued)

**Responses to Comments Matrix**

<table>
<thead>
<tr>
<th>LETTER NO.</th>
<th>SUMMARY OF WRITTEN COMMENTS</th>
<th>PROJECT DESCRIPTION</th>
<th>ENVIRONMENTAL SETTING</th>
<th>AESTHETICS/VISUAL RESOURCES</th>
<th>AIR QUALITY/GHG</th>
<th>BIOLOGICAL RESOURCES</th>
<th>CULTURAL RESOURCES</th>
<th>GEOLOGY AND SOILS</th>
<th>HAZARDS AND HAZARDOUS MATERIALS</th>
<th>HYDROLOGY/WATER QUALITY</th>
<th>LAND USE</th>
<th>NOISE</th>
<th>TRAFFIC, CIRCULATION &amp; PARKING</th>
<th>WASTEWATER</th>
<th>WATER</th>
<th>ENERGY</th>
<th>SOLID WASTE</th>
<th>FIRE PROTECTION</th>
<th>ALTERNATIVES</th>
<th>OTHER ENVIRONMENTAL CONSIDERATIONS</th>
<th>GENERAL SUPPORT</th>
<th>GENERAL OPPOSITION</th>
<th>OTHER</th>
</tr>
</thead>
<tbody>
<tr>
<td>24</td>
<td>Ron Ostrow</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>President Greater Griffith Park Neighborhood Council P.O. Box 27003 Los Angeles, CA 90027-0003 <a href="http://www.ggpnc.org">www.ggpnc.org</a></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>25</td>
<td>Gary Hickman</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Junior Achievement of Southern California, Inc. 6250 Forest Lawn Drive Los Angeles, CA 90068 <a href="http://www.jasocal.org">www.jasocal.org</a></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>26</td>
<td>Donald A. Seligman</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>President Los Feliz Improvement Association P.O. Box 29395 Los Angeles, CA 90029 <a href="http://www.lfia.org">www.lfia.org</a></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Table III-1 (Continued)
#### Responses to Comments Matrix

<table>
<thead>
<tr>
<th>LETTER NO.</th>
<th>SUMMARY OF WRITTEN COMMENTS</th>
<th>PROJECT DESCRIPTION</th>
<th>ENVIRONMENTAL SETTING</th>
<th>AESTHETICS/VISUAL RESOURCES</th>
<th>AIR QUALITY/GHG</th>
<th>BIOLOGICAL RESOURCES</th>
<th>CULTURAL RESOURCES</th>
<th>GEOLOGY AND SOILS</th>
<th>HAZARDS AND HAZARDOUS MATERIALS</th>
<th>HYDROLOGY/WATER QUALITY</th>
<th>LAND USE</th>
<th>NOISE</th>
<th>TRAFFIC, CIRCULATION &amp; PARKING</th>
<th>WASTEWATER</th>
<th>WATER</th>
<th>ENERGY</th>
<th>SOLID WASTE</th>
<th>FIRE PROTECTION</th>
<th>ALTERNATIVES</th>
<th>OTHER ENVIRONMENTAL CONSIDERATIONS</th>
<th>GENERAL SUPPORT</th>
<th>GENERAL OPPOSITION</th>
<th>OTHER</th>
</tr>
</thead>
<tbody>
<tr>
<td>27</td>
<td>Donald A. Seligman, D.D.S.</td>
<td>President Los Feliz Improvement Association</td>
<td>P.O. Box 29395</td>
<td>Los Angeles, CA  90029</td>
<td><a href="http://www.lfia.org">www.lfia.org</a></td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>28</td>
<td>Donald A. Seligman, D.D.S.</td>
<td>President LFIA</td>
<td>P.O. Box 29395</td>
<td>Los Angeles, CA  90029</td>
<td><a href="http://www.lfia.org">www.lfia.org</a></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>29</td>
<td>Joseph F. Young</td>
<td>Chair, Griffith Park Task Force Angeles Chapter Sierra Club, 3435 Wilshire Blvd., Ste. 320 Los Angeles, CA  90010-1904 <a href="http://www.angeles.sierraclub.org">www.angeles.sierraclub.org</a> 12551 Presnell St. Los Angeles, CA  90066-6730</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Table III-1 (Continued)
Responses to Comments Matrix

<table>
<thead>
<tr>
<th>LETTER NO.</th>
<th>SUMMARY OF WRITTEN COMMENTS</th>
<th>PROJECT DESCRIPTION</th>
<th>ENVIRONMENTAL SETTING</th>
<th>AESTHETICS/VISUAL RESOURCES</th>
<th>AIR QUALITY/GHG</th>
<th>BIOLOGICAL RESOURCES</th>
<th>CULTURAL RESOURCES</th>
<th>GEOLOGY AND SOILS</th>
<th>HAZARDS AND HAZARDOUS MATERIALS</th>
<th>HYDROLOGY/WATER QUALITY</th>
<th>LAND USE</th>
<th>NOISE</th>
<th>TRAFFIC, CIRCULATION &amp; PARKING</th>
<th>WASTEWATER</th>
<th>WATER</th>
<th>ENERGY</th>
<th>SOLID WASTE</th>
<th>FIRE PROTECTION</th>
<th>ALTERNATIVES</th>
<th>OTHER ENVIRONMENTAL CONSIDERATIONS</th>
<th>GENERAL SUPPORT</th>
<th>GENERAL OPPOSITION</th>
<th>OTHER</th>
</tr>
</thead>
<tbody>
<tr>
<td>30</td>
<td>Joseph F. Young</td>
<td>Chair, Griffith Park Task Force Angeles Chapter Sierra Club, 3435 Wilshire Blvd., Ste. 320 Los Angeles, CA 90010-1904 <a href="http://www.angeles.sierraclub.org">www.angeles.sierraclub.org</a> 12551 Presnell St. Los Angeles, CA 90066-6730</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>31</td>
<td>Caroline Schweich</td>
<td>President The Oaks Homeowners Association P.O. Box 29155 Los Angeles, CA 90029-0155</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>32</td>
<td>Gerry Turner</td>
<td>President 2010–11 Rotary Club of Los Angeles 900 Wilshire Blvd., Ste. 418 Los Angeles, CA 90017 <a href="http://www.rotaryLA5.org">www.rotaryLA5.org</a></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

City of Los Angeles
Forest Lawn Memorial-Park–Hollywood Hills Master Plan
SCH. No. 2008111048
January 2012

Page III-12
### Table III-1 (Continued)
Responses to Comments Matrix

<table>
<thead>
<tr>
<th>LETTER NO.</th>
<th>SUMMARY OF WRITTEN COMMENTS</th>
<th>PROJECT DESCRIPTION</th>
<th>ENVIRONMENTAL SETTING</th>
<th>AESTHETICS/VISUAL RESOURCES</th>
<th>AIR QUALITY/GHG</th>
<th>BIOLOGICAL RESOURCES</th>
<th>CULTURAL RESOURCES</th>
<th>GEOLOGY AND SOILS</th>
<th>HAZARDS AND HAZARDOUS MATERIALS</th>
<th>HYDROLOGY/WATER QUALITY</th>
<th>LAND USE</th>
<th>NOISE</th>
<th>TRAFFIC, CIRCULATION &amp; PARKING</th>
<th>WATER</th>
<th>ENERGY</th>
<th>SOLID WASTE</th>
<th>FIRE PROTECTION</th>
<th>ALTERNATIVES</th>
<th>OTHER ENVIRONMENTAL CONSIDERATIONS</th>
<th>GENERAL SUPPORT</th>
<th>GENERAL OPPOSITION</th>
<th>OTHER</th>
</tr>
</thead>
<tbody>
<tr>
<td>33</td>
<td>Sue Abrahamian</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>9653 McLennan Ave.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td></td>
<td>Northridge, CA 91343</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>34</td>
<td>Edward R. Amey, MS</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Executive Director</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td></td>
<td>L.A. Lutheran High School</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td></td>
<td>13570 Eldridge Ave.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Sylmar, CA 91342</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>35</td>
<td>Kamran Amirhooshmand</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td></td>
<td>1530 S. Saltair Ave., Apt. 1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Los Angeles, CA 90025</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>36</td>
<td>Susanna Asatryan</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td></td>
<td>4040 Braeburn Way</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Los Angeles, CA 90027</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>37</td>
<td>Rev. Vazken Atmajian</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Pastor</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td></td>
<td>St. Mary's Armenian</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Apostolic Church</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td></td>
<td>500 S. Central Ave.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Glendale, CA 91204</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>LETTER NO.</td>
<td>SUMMARY OF WRITTEN COMMENTS</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>-----------</td>
<td>----------------------------</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>38</td>
<td>Glen Baker</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Principal</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Glendale Adventist Academy</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>A K–12 Christian Preparatory School</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>700 Kimlin Dr.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Glendale, CA 91206</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td><a href="http://www.glendaleacademy.org">www.glendaleacademy.org</a></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>39</td>
<td>Angelina Balian</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>19133 Hartland St.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Reseda, CA 91335</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>40</td>
<td>Adolph Eric Becker</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>4296 Don Luis Dr.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Los Angeles, CA 90008</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>41</td>
<td>Rachel Belotserkovsky</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>12410 Chandler Blvd., #2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Valley Village, CA 91607</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Table III-1 (Continued)
#### Responses to Comments Matrix

<table>
<thead>
<tr>
<th>LETTER NO.</th>
<th>SUMMARY OF WRITTEN COMMENTS</th>
<th>PROJECT DESCRIPTION</th>
<th>ENVIRONMENTAL SETTING</th>
<th>AESTHETICS/Visual Resources</th>
<th>AIR QUALITY/GHG</th>
<th>BIOLOGICAL RESOURCES</th>
<th>CULTURAL RESOURCES</th>
<th>GEOLOGY AND SOILS</th>
<th>HAZARDS AND HAZARDOUS MATERIALS</th>
<th>HYDROLOGY/WATER QUALITY</th>
<th>LAND USE</th>
<th>NOISE</th>
<th>TRAFFIC, CIRCULATION &amp; PARKING</th>
<th>WASTEWATER</th>
<th>WATER</th>
<th>ENERGY</th>
<th>SOLID WASTE</th>
<th>FIRE PROTECTION</th>
<th>ALTERNATIVES</th>
<th>OTHER ENVIRONMENTAL CONSIDERATIONS</th>
<th>GENERAL SUPPORT</th>
<th>GENERAL OPPOSITION</th>
<th>OTHER</th>
</tr>
</thead>
</table>
| 42         | Robert M. Bock  
Senior Pastor  
First Christian Church of North Hollywood  
4390 Colfax Ave.  
North Hollywood, CA 91604-2898 |                     |                      |                             |                 |                      |                    |                  |                                  |                        |          |       | X                            |            |       |         |             |                |            |                                   |                     |                  |       |
| 43         | Edward Bockser  
4741 Clybourn Ave.  
Toluca Lake, CA 91602 |                     |                      |                             |                 |                      |                    |                  |                                  |                        |          |       | X                            |            |       |         |             |                |            |                                   |                     |                  |       |
| 44         | William J. Bowers  
4740 Placidia Ave.  
Toluca Lake, CA 91602 |                     |                      |                             |                 |                      |                    |                  |                                  |                        |          |       | X                            |            |       |         |             |                |            |                                   |                     |                  |       |
| 45         | David Briggs  
2522 S. Bentley Ave.  
Los Angeles, CA 90064 |                     |                      |                             |                 |                      |                    |                  |                                  |                        |          |       | X                            |            |       |         |             |                |            |                                   |                     |                  |       |
| 46         | Cleo Cameron  
4961 Linscott Pl., Apt. 1  
Los Angeles, CA 90016 |                     |                      |                             |                 |                      |                    |                  |                                  |                        |          |       | X                            |            |       |         |             |                |            |                                   |                     |                  |       |
<table>
<thead>
<tr>
<th>LETTER NO.</th>
<th>SUMMARY OF WRITTEN COMMENTS</th>
<th>PROJECT DESCRIPTION</th>
<th>ENVIRONMENTAL SETTING</th>
<th>AESTHETICS/VISUAL RESOURCES</th>
<th>AIR QUALITY/GHG</th>
<th>BIOLOGICAL RESOURCES</th>
<th>CULTURAL RESOURCES</th>
<th>GEOLOGY AND SOILS</th>
<th>HAZARDS AND HAZARDOUS MATERIALS</th>
<th>HYDROLOGY/WATER QUALITY</th>
<th>LAND USE</th>
<th>NOISE</th>
<th>TRAFFIC, CIRCULATION &amp; PARKING</th>
<th>WASTEWATER</th>
<th>WATER</th>
<th>ENERGY</th>
<th>SOLID WASTE</th>
<th>FIRE PROTECTION</th>
<th>ALTERNATIVES</th>
<th>OTHER ENVIRONMENTAL CONSIDERATIONS</th>
<th>GENERAL SUPPORT</th>
<th>GENERAL OPPOSITION</th>
<th>OTHER</th>
</tr>
</thead>
<tbody>
<tr>
<td>47</td>
<td>Ruthann Carlson</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>15916 Gledhill St.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>North Hills, CA 91343</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>48</td>
<td>William S. Coburn, Architect</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>12802 Landale St.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>North Hollywood, CA 91604</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>49</td>
<td>Naomi Collins</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>1083 S. Genesee Ave.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Los Angeles, CA 90019</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>50</td>
<td>John Combes</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Director</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Notre Dame High School</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Irish Knight Band</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>13645 Riverside Dr.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Sherman Oaks, CA 91423-2494</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td><a href="http://www.ndhs.org">www.ndhs.org</a></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

III. Responses to Comments
### Table III-1 (Continued)
**Responses to Comments Matrix**

<table>
<thead>
<tr>
<th>LETTER NO.</th>
<th>SUMMARY OF WRITTEN COMMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>51</td>
<td>James Covey</td>
</tr>
<tr>
<td></td>
<td>CEO</td>
</tr>
<tr>
<td></td>
<td>Inland Hospice Association</td>
</tr>
<tr>
<td></td>
<td>Inland Hospice &amp; Palliative Care</td>
</tr>
<tr>
<td></td>
<td>233 West Harrison Ave.</td>
</tr>
<tr>
<td></td>
<td>Claremont, CA 91711</td>
</tr>
<tr>
<td></td>
<td><a href="http://www.inlandhospice.org">www.inlandhospice.org</a></td>
</tr>
<tr>
<td>52</td>
<td>Erna Craig</td>
</tr>
<tr>
<td></td>
<td>5212 Los Hermosos Way</td>
</tr>
<tr>
<td></td>
<td>Los Angeles, CA 90027</td>
</tr>
<tr>
<td>53</td>
<td>Joyce Dillard</td>
</tr>
<tr>
<td></td>
<td>P.O. Box 31377</td>
</tr>
<tr>
<td></td>
<td>Los Angeles, CA 90031</td>
</tr>
<tr>
<td></td>
<td><a href="mailto:dillardjoyce@yahoo.com">dillardjoyce@yahoo.com</a></td>
</tr>
<tr>
<td>54</td>
<td>Rev. Patricia Farris</td>
</tr>
<tr>
<td></td>
<td>Senior Minister</td>
</tr>
<tr>
<td></td>
<td>First United Methodist Church of Santa Monica</td>
</tr>
<tr>
<td></td>
<td>1008 11th St.</td>
</tr>
<tr>
<td></td>
<td>Santa Monica, CA 90403</td>
</tr>
</tbody>
</table>

III. Responses to Comments
### Table III-1 (Continued)
#### Responses to Comments Matrix

<table>
<thead>
<tr>
<th>LETTER NO.</th>
<th>SUMMARY OF WRITTEN COMMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>55</td>
<td>Sara Fisk</td>
</tr>
<tr>
<td></td>
<td>New Valley Symphony Orchestra</td>
</tr>
<tr>
<td></td>
<td>P.O. Box 57018</td>
</tr>
<tr>
<td></td>
<td>Sherman Oaks, CA 91413</td>
</tr>
<tr>
<td></td>
<td>X</td>
</tr>
<tr>
<td>56</td>
<td>Carolee Flowers-Skinner</td>
</tr>
<tr>
<td></td>
<td>5400 Arbor Vitae St. #104</td>
</tr>
<tr>
<td></td>
<td>Los Angeles, CA 90045</td>
</tr>
<tr>
<td></td>
<td>X</td>
</tr>
<tr>
<td>57</td>
<td>Ellen Franklin</td>
</tr>
<tr>
<td></td>
<td>Executive Director</td>
</tr>
<tr>
<td></td>
<td>Temple Judea</td>
</tr>
<tr>
<td></td>
<td>5429 Lindley Ave.</td>
</tr>
<tr>
<td></td>
<td>Tarzana, CA 91356</td>
</tr>
<tr>
<td></td>
<td>6601 Valley Circle Blvd.</td>
</tr>
<tr>
<td></td>
<td>West Hills, CA 91307</td>
</tr>
<tr>
<td></td>
<td>X</td>
</tr>
<tr>
<td>58</td>
<td>Mark Gailys</td>
</tr>
<tr>
<td></td>
<td>14363 Mulholland Dr.</td>
</tr>
<tr>
<td></td>
<td>Los Angeles, CA 90077</td>
</tr>
<tr>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>
### Table III-1 (Continued)
**Responses to Comments Matrix**

<table>
<thead>
<tr>
<th>LETTER NO.</th>
<th>SUMMARY OF WRITTEN COMMENTS</th>
</tr>
</thead>
</table>
| 59 Tasha Gailys  
14363 Mulholland Dr.  
Los Angeles, CA 90077 | X |
| 60 Jesus Garber  
3307 Ledgewood Dr.  
Los Angeles, CA 90068 | X |
| 61 Dale J. Goldsmith, Esq.  
Armbruster Goldsmith & Delvac LLP  
11611 San Vicente Blvd., Ste. 900  
Los Angeles, CA 90049  
www.agd-landuse.com | X |
| 62 Myra Gosda  
5961 Chula Vista Way, Apt. 3  
Los Angeles, CA 90068 | X |
| 63 Pastor Jack W. Hayford  
The Church On The Way  
nlove@kingsuniversity.edu | X |
### Table III-1 (Continued)
Responses to Comments Matrix

<table>
<thead>
<tr>
<th>LETTER NO.</th>
<th>SUMMARY OF WRITTEN COMMENTS</th>
<th>PROJECT DESCRIPTION</th>
<th>ENVIRONMENTAL SETTING</th>
<th>AESTHETICS/VISUAL RESOURCES</th>
<th>AIR QUALITY/GHG</th>
<th>BIOLOGICAL RESOURCES</th>
<th>CULTURAL RESOURCES</th>
<th>GEOLOGY AND SOILS</th>
<th>HAZARDS AND HAZARDOUS MATERIALS</th>
<th>HYDROLOGY/WATER QUALITY</th>
<th>LAND USE</th>
<th>NOISE</th>
<th>TRAFFIC, CIRCULATION &amp; PARKING</th>
<th>WASTEWATER</th>
<th>WATER</th>
<th>ENERGY</th>
<th>SOLID WASTE</th>
<th>FIRE PROTECTION</th>
<th>ALTERNATIVES</th>
<th>OTHER ENVIRONMENTAL CONSIDERATIONS</th>
<th>GENERAL SUPPORT</th>
<th>GENERAL OPPOSITION</th>
<th>OTHER</th>
</tr>
</thead>
<tbody>
<tr>
<td>64</td>
<td>Tammy Huber</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>65</td>
<td>Steven Kerstein</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Music Director &amp; Conductor</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Burbank Philharmonic Orchestra</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>66</td>
<td>Rev. Vance Knutsen</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>67</td>
<td>Leonard Lawrence</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td></td>
<td>General Manager</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Mount Sinai Memorial Parks and Mortuaries</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Mount Sinai Hollywood Hills</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td></td>
<td>5950 Forest Lawn Dr.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Los Angeles, CA 90068</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>68</td>
<td>Elinor Lloyd</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>
### Table III-1 (Continued)
Responses to Comments Matrix

<table>
<thead>
<tr>
<th>LETTER NO.</th>
<th>SUMMARY OF WRITTEN COMMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>69</td>
<td>Edwin P. Mah</td>
</tr>
<tr>
<td></td>
<td>Chinese Consolidated Benevolent Association</td>
</tr>
<tr>
<td></td>
<td>925 N. Broadway</td>
</tr>
<tr>
<td></td>
<td>Los Angeles, CA 90012</td>
</tr>
<tr>
<td></td>
<td>X</td>
</tr>
<tr>
<td>70</td>
<td>Larry R. Maib</td>
</tr>
<tr>
<td></td>
<td>Senior Pastor</td>
</tr>
<tr>
<td></td>
<td>First Baptist Church of Canoga Park</td>
</tr>
<tr>
<td></td>
<td>20553 Sherman Way</td>
</tr>
<tr>
<td></td>
<td>Canoga Park, CA 91306</td>
</tr>
<tr>
<td></td>
<td>X</td>
</tr>
<tr>
<td>71</td>
<td>Lisa Marxer</td>
</tr>
<tr>
<td></td>
<td>19702 Nicholas Ave.</td>
</tr>
<tr>
<td></td>
<td>Cerritos, CA 90703</td>
</tr>
<tr>
<td></td>
<td>X</td>
</tr>
<tr>
<td>72</td>
<td>Rev. Robert T. McDill</td>
</tr>
<tr>
<td></td>
<td>20200 Gilmore St.</td>
</tr>
<tr>
<td></td>
<td>Winnetka, CA 91306-4212</td>
</tr>
<tr>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>
### Table III-1 (Continued)
**Responses to Comments Matrix**

<table>
<thead>
<tr>
<th>LETTER NO.</th>
<th>SUMMARY OF WRITTEN COMMENTS</th>
<th>PROJECT DESCRIPTION</th>
<th>ENVIRONMENTAL SETTING</th>
<th>AESTHETICS/ VISUAL RESOURCES</th>
<th>AIR QUALITY/ GHG</th>
<th>BIOLOGICAL RESOURCES</th>
<th>CULTURAL RESOURCES</th>
<th>GEOLOGY AND SOILS</th>
<th>HAZARDS AND HAZARDOUS MATERIALS</th>
<th>HYDROLOGY/ WATER QUALITY</th>
<th>LAND USE</th>
<th>NOISE</th>
<th>TRAFFIC, CIRCULATION &amp; PARKING</th>
<th>WASTEWATER</th>
<th>WATER</th>
<th>ENERGY</th>
<th>SOLID WASTE</th>
<th>FIRE PROTECTION</th>
<th>ALTERNATIVES</th>
<th>OTHER ENVIRONMENTAL CONSIDERATIONS</th>
<th>GENERAL SUPPORT</th>
<th>GENERAL OPPOSITION</th>
<th>OTHER</th>
</tr>
</thead>
<tbody>
<tr>
<td>73</td>
<td>Mary McKain</td>
<td>Elk’s #99 Concert Band P.O. Box 5884 Glendale, CA 91201</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>74</td>
<td>Myka Miller</td>
<td>Executive Director Harmony Project 817 Vine St., Ste. 212 Los Angeles, CA 90038 <a href="http://www.harmony-project.org">www.harmony-project.org</a></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>75</td>
<td>Tom Nare</td>
<td>Village Christian Schools 8930 Village Ave. Sun Valley, CA 91352 <a href="http://www.villagechristian.org">www.villagechristian.org</a></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>76</td>
<td>Dale J. Goldsmith</td>
<td>Armbruster Goldsmith &amp; Delvac LLP on behalf of NBCUniversal 11611 San Vicente Blvd., Ste. 900 Los Angeles, CA 90049</td>
<td></td>
<td>X</td>
<td>X</td>
<td></td>
<td>X</td>
<td></td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

City of Los Angeles  
Forest Lawn Memorial-Park–Hollywood Hills Master Plan  
SCH. No. 2008111048  
January 2012  
Page III-22
### Table III-1 (Continued)
Responses to Comments Matrix

<table>
<thead>
<tr>
<th>LETTER NO.</th>
<th>SUMMARY OF WRITTEN COMMENTS</th>
<th>PROJECT DESCRIPTION</th>
<th>ENVIRONMENTAL SETTING</th>
<th>AESTHETICS/VISUAL RESOURCES</th>
<th>AIR QUALITY/GHG</th>
<th>BIOLOGICAL RESOURCES</th>
<th>CULTURAL RESOURCES</th>
<th>GEOLOGY AND SOILS</th>
<th>HAZARDS AND HAZARDOUS MATERIALS</th>
<th>HYDROLOGY/WATER QUALITY</th>
<th>LAND USE</th>
<th>NOISE</th>
<th>TRAFFIC, CIRCULATION &amp; PARKING</th>
<th>WASTEWATER</th>
<th>WATER</th>
<th>ENERGY</th>
<th>SOLID WASTE</th>
<th>FIRE PROTECTION</th>
<th>ALTERNATIVES</th>
<th>OTHER ENVIRONMENTAL CONSIDERATIONS</th>
<th>GENERAL SUPPORT</th>
<th>GENERAL OPPOSITION</th>
<th>OTHER</th>
</tr>
</thead>
<tbody>
<tr>
<td>77</td>
<td>James Porras</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Director of Career Services</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Concorde Career Institute</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>12412 Victory Blvd.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>North Hollywood, CA 91606-3134</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td><a href="http://www.concordecareercolleges.com">www.concordecareercolleges.com</a></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>78</td>
<td>Bruce Rankin</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Executive Director</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Westside Food Bank</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>1710 22nd St.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Santa Monica, CA 90404</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td><a href="http://www.westsidefoodbankca.org">www.westsidefoodbankca.org</a></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>79</td>
<td>Rev. Mark R. Sandstrom</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Pastor</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Covina Christian Church (Disciples of Christ)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>240 S. Grand Ave.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Covina, CA 91724</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:covinachristian@verizon.net">covinachristian@verizon.net</a></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
## Table III-1 (Continued)

### Responses to Comments Matrix

<table>
<thead>
<tr>
<th>LETTER NO.</th>
<th>SUMMARY OF WRITTEN COMMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>80</td>
<td>David Snow</td>
</tr>
<tr>
<td></td>
<td>Executive Director</td>
</tr>
<tr>
<td></td>
<td>Upward Bound House</td>
</tr>
<tr>
<td></td>
<td>1104 Washington Ave.</td>
</tr>
<tr>
<td></td>
<td>Santa Monica, CA 90403</td>
</tr>
<tr>
<td></td>
<td><a href="http://www.upwardboundhouse.org">www.upwardboundhouse.org</a></td>
</tr>
<tr>
<td>81</td>
<td>Robert L. Snyder</td>
</tr>
<tr>
<td></td>
<td>Pastor</td>
</tr>
<tr>
<td></td>
<td>Community Christian Church</td>
</tr>
<tr>
<td></td>
<td>of the Foothills</td>
</tr>
<tr>
<td></td>
<td>10193 Tujunga Canyon Blvd.</td>
</tr>
<tr>
<td></td>
<td>Tujunga, CA 91042</td>
</tr>
<tr>
<td>82</td>
<td>Larry L. Stamper</td>
</tr>
<tr>
<td></td>
<td>Pastor Emeritus</td>
</tr>
<tr>
<td></td>
<td>Burbank First United Methodist Church</td>
</tr>
<tr>
<td></td>
<td>700 N. Glenoaks Blvd.</td>
</tr>
<tr>
<td></td>
<td>Burbank, CA 91502</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>LETTER NO.</th>
<th>SUMMARY OF WRITTEN COMMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>80</td>
<td>X</td>
</tr>
<tr>
<td>81</td>
<td>X</td>
</tr>
<tr>
<td>82</td>
<td>X</td>
</tr>
</tbody>
</table>
### Table III-1 (Continued)
**Responses to Comments Matrix**

<table>
<thead>
<tr>
<th>LETTER NO.</th>
<th>SUMMARY OF WRITTEN COMMENTS</th>
<th>PROJECT DESCRIPTION</th>
<th>ENVIRONMENTAL SETTING</th>
<th>AESTHETICS/VISUAL RESOURCES</th>
<th>AIR QUALITY/GHG</th>
<th>BIOLOGICAL RESOURCES</th>
<th>CULTURAL RESOURCES</th>
<th>GEOLOGY AND SOILS</th>
<th>HAZARDS AND HAZARDOUS MATERIALS</th>
<th>HYDROLOGY/WATER QUALITY</th>
<th>LAND USE</th>
<th>NOISE</th>
<th>TRAFFIC, CIRCULATION &amp; PARKING</th>
<th>WASTEWATER</th>
<th>WATER</th>
<th>ENERGY</th>
<th>SOLID WASTE</th>
<th>FIRE PROTECTION</th>
<th>ALTERNATIVES</th>
<th>OTHER ENVIRONMENTAL CONSIDERATIONS</th>
<th>GENERAL SUPPORT</th>
<th>GENERAL OPPOSITION</th>
<th>OTHER</th>
</tr>
</thead>
<tbody>
<tr>
<td>83</td>
<td>Rev. Bob Thomson</td>
<td>Co-Pastor</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td></td>
<td>Woodland Hills Presbyterian Church</td>
<td>5751 Platt Ave.</td>
<td>Woodland Hills, CA 91367</td>
<td><a href="http://www.woodlandhillspres.org">www.woodlandhillspres.org</a></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>84</td>
<td>Dr. Wayne B. Walters</td>
<td>Senior Pastor</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td></td>
<td>Burbank First United Methodist Church</td>
<td>700 N. Glenoaks Blvd.</td>
<td>Burbank, CA 91502</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>85</td>
<td>Anita Wright</td>
<td>Regional Director, Los Angeles Braille Institute</td>
<td>741 N. Vermont Ave.</td>
<td>Los Angeles, CA 90029</td>
<td><a href="http://www.brailleinstitute.org">www.brailleinstitute.org</a></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>LETTER NO.</td>
<td>SUMMARY OF WRITTEN COMMENTS</td>
<td>PROJECT DESCRIPTION</td>
<td>ENVIRONMENTAL SETTING</td>
<td>AESTHETICS/ VISUAL RESOURCES</td>
<td>AIR QUALITY/ GHG</td>
<td>BIOLOGICAL RESOURCES</td>
<td>CULTURAL RESOURCES</td>
<td>GEOLOGY AND SOILS</td>
<td>MATERIALS</td>
<td>HYDROLOGY / WATER QUALITY</td>
<td>LAND USE</td>
<td>NOISE</td>
<td>TRAFFIC, CIRCULATION &amp; PARKING</td>
<td>WASTEWATER</td>
<td>WATER</td>
<td>ENERGY</td>
<td>SOLID WASTE</td>
<td>FIRE PROTECTION</td>
<td>ALTERNATIVES</td>
<td>OTHER ENVIRONMENTAL CONSIDERATIONS</td>
<td>GENERAL SUPPORT</td>
<td>GENERAL OPPOSITION</td>
<td>OTHER</td>
</tr>
<tr>
<td>-----------</td>
<td>-----------------------------</td>
<td>---------------------</td>
<td>-----------------------</td>
<td>-----------------------------</td>
<td>------------------</td>
<td>----------------------</td>
<td>---------------------</td>
<td>------------------</td>
<td>-----------------</td>
<td>---------------------</td>
<td>--------</td>
<td>-------</td>
<td>-----------------------------</td>
<td>-----------</td>
<td>-------</td>
<td>--------</td>
<td>-------------</td>
<td>----------------</td>
<td>-------------</td>
<td>---------------------------------</td>
<td>---------------</td>
<td>------------------</td>
<td>--------</td>
</tr>
<tr>
<td>86</td>
<td>Rev. Alice Parsons Zulli, FT Chaplain Associate Board Certified Pastoral Counselor Director, Bereavement Support and Services Glendale Adventist Medical Center 1509 Wilson Ter. Glendale, CA 91206</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>87</td>
<td>Lewis MacAdams Founder and President Friends of the Los Angeles River 570 W. Avenue 26, Ste. 250 Los Angeles, CA 90065-1047 <a href="mailto:mail@folar.org">mail@folar.org</a> <a href="http://www.folar.org">www.folar.org</a></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
III. Responses to Comments

C. Comment Letters

Comment Letter No. 1

Scott Morgan
Director, State Clearinghouse
1400 10th St.
P.O. Box 3044
Sacramento, CA 95812-3044

Comment No. 1-1

Pursuant to the attached letter, the Lead Agency has extended the review period for the above referenced project to April 13, 2011 to accommodate the review process. All other project information remains the same.

Response to Comment No. 1-1

The comment from the Governor's Office of Planning and Research acknowledges that the comment period for the Draft EIR was extended by the City for an additional 15 days, ending on April 13, 2011. The total comment period was 60 days, which exceeds the 45-day public review period required by CEQA Guidelines Section 15105 when a Draft EIR is submitted to the State Clearinghouse for review by State agencies.
Comment Letter No. 2

Scott Morgan  
Director, State Clearinghouse  
1400 10th St.  
P.O. Box 3044  
Sacramento, CA  95812-3044

Comment No. 2-1

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on April 13, 2011, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project’s ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

“A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation.”

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Response to Comment No. 2-1

The comment acknowledges the receipt of the Draft EIR by the State of California Governor’s Office of Planning and Research, State Clearinghouse and Planning Unit, and the City’s compliance with State Clearinghouse review requirements for draft environmental documents, in accordance with CEQA. This letter also encloses comments from the Native American Heritage Commission and Department of Fish and Game regarding the Draft EIR. Please refer to Comment Letter Nos. 3 and 4 for responses to the Native American Heritage Commission and California Department of Fish and Game comments, respectively.
Comment Letter No. 3

Edmund Pert
Regional Manager
South Coast Region
California Department of Fish and Game
4949 Viewridge Ave.
San Diego, CA  92123

Comment No. 3-1

The Department of Fish and Game (Department) has received the request to provide input on the preparation of a Draft Environmental Impact Report (DEIR) for the analysis of the effects of a proposal to expand the Forest Lawn Memorial Park. The Project is located at the base of the northeastern portion of the Santa Monica Mountains in the City of Los Angeles at the existing Forest Lawn Memorial-Park–Hollywood Hills property, located at 6300 Forest Lawn Drive, in the City of Los Angeles (Project Site). The existing Project Site comprises approximately 444 acres and is bounded by Forest Lawn Drive, the Los Angeles River Flood Control Channel and the 134 Freeway on the north, Griffith Park on the south and east, adjacent undeveloped property owned by Forest Lawn Memorial-Park Association on the west, and by Mount Sinai Memorial Park and the administrative offices of the Junior Achievement of Southern California, Inc. to the north and northeast. The Project Site is buffered from residential and commercial uses, and many of the property’s uses are not visible from off-site, due to the topography of this area.

The Project seeks approval to construct approximately 22,500 square feet of floor area for new structures (including structures for a new church, reception-related uses, administrative space, and a crematory), and approximately 1,100,000 square feet of non-occupied floor area. In addition, the Project includes approximately 200,000 new interment sites currently undeveloped areas of the Project site. Approximately 7,000 new interment spaces (built spaces) and additional ground spaces would also be constructed within existing developed areas of the Project Site. The Project also includes the development and maintenance of debris basins within the Project Site and at the edge of the property boundary with Griffith Park. It is estimated that over a 15-year construction period, implementation of the proposed Project would require approximately 1,728,000 cubic yards of cut, approximately 1,015,000 cubic yards of fill, and a net export amount of approximately 713,000 cubic yard. In addition, up to 400,000 cubic yards of dirt will be exported in connection with grave preparation through 2050. Depending on when the entitlement process is completed, construction of the Project could commence in 2011 or 2012.

The following comments and recommendations were prepared under the Department authority as California’s Trustee Agency for fish and wildlife resources, holding these
resources in trust for the People of the State pursuant to various provisions of the California Fish and Game Code. (Fish & G. Code, §§ 711.7, subd. (a), 1802.) The Department submits these comments in that capacity under CEQA. (See generally Pub. Resources Code, §§ 21070; 21080.4.) Given its related permitting authority under CESA and Fish and Game Code section 1600 \textit{et seq.}, the Department also submits these comments likely as a Responsible Agency for the Project under CEQA. (Id., § 21069.):

\textbf{Response to Comment No. 3-1}

The introductory comments are noted and have been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. The comment accurately describes the proposed Project. Specific comments regarding the environmental analysis in the Draft EIR are responded to below.

\textbf{Comment No. 3-2}

Impacts to Biological Resources

1. \textbf{Botanical Resource Assessment}—The DEIR utilizes an outdated classification system for vegetation communities that does not reflect the true composition and value of these resources to the State of California. \textit{The Manual of California Vegetation, Second Edition} (2009) is the classification system recognized by the Department and a list of the vegetation Natural Communities or Alliances recognized by the Department can be found on-line at \url{http://www.dfg.ca.gov/biogeodata/vegcamp/pdfs/natcomlist.pdf}. Please be advised that classifications such as ‘non-native grassland’ have been replaced by more meaningful classifications that more accurately document the true composition of species (both herbs and forbs) as well as allow the Department to accurately assess the value to wildlife these important vegetation systems provide. The classification non-native grassland no longer is recognized as it tends to discount the native herbs and forbs that can seasonally dominate this system, as well as discounting the importance this habitat type plays for native species. This manual can be found at \url{http://www.cnps.org/cnps/vegetation/manual_2ed.php}. Please update your mapping and classification in the DEIR as well as any corresponding mitigation measures proposed for mitigating impacts to these particular communities.

\textbf{Response to Comment No. 3-2}

The Draft EIR and underlying biological technical reports (attached to the Draft EIR within Appendix C) generally utilize classifications as described in the 2003 California Department of Fish and Game (“CDFG”) \textit{List of Terrestrial Natural Communities, Preliminary Descriptions of the Terrestrial Natural Communities of California} (Holland 1986) and \textit{A Manual of California Vegetation} (Sawyer and Keeler-Wolf 1995) to properly describe vegetation communities on the Project Site. These literature sources have been used for a
number of years for describing vegetation communities within the State of California, and *A Manual of California Vegetation* was listed as a suggested reference in the CDFG “Guidelines for Assessing the Effects of Proposed Projects on Rare, Threatened, and Endangered Plants and Plant Communities” attached to CDFG’s December 9, 2008 letter regarding the Notice of Preparation for the Project and included within Appendix A to the Draft EIR. The second edition of *A Manual of California Vegetation* was published in 2009, after biological resources analysis for the Project was underway, and the new CDFG Natural Communities List was not available until 2011.

In response to the comment, the vegetation community classifications used in the Draft EIR were compared to the vegetation community classifications from the new CDFG Natural Communities List referenced in the comment. The former and new classifications for functionally analogous plant communities mapped on the Project Site are presented in Table III-2 on page III-32. These correlations are based on dominant plant species compositions as integrated with the vegetative arrays on-site. As noted in Table III-2, the sensitivity rankings remain the same for CDFG for each community type. The habitat value of these vegetation communities is not altered with the new classification system, and the changes in classification of these vegetation communities do not affect the analyses or significance conclusions presented in the Draft EIR.

As explained on page IV.C-17 of Section IV.C, Biological Resources, of the Draft EIR, non-native grassland is the only discernible grassland community on the Project Site. Native grasses do occur, such as giant wild rye (*Leymus condensatus*) and purple needle grass (*Nassella pulchra*). However, the native grasses occur in patches too small to map. Giant wild rye is associated with seeps (highly localized surface areas where subsurface water saturates the ground seasonally and sometimes exudes minor surface flows or springs, usually very short in geographic extent and duration) at the base of slopes in the southern portion of the Project Site. Purple needle grass occurs variously in both chaparral and upland scrub communities, but not in substantial densities or specific geographic locations.

With respect to the composition of non-native grassland on the Project Site, as the Draft EIR explains, it primarily comprises brome (*Bromus* spp.), barley (*Hordeum murinum*), Mediterranean schismus (*Schismus barbatus*), filaree (*Erodium* spp.), mustard (*Brassica* spp. and *Hirschfeldia* spp.), and Italian thistle (*Carduus pycnocephalus*). A number of native herbaceous species are commonly associated with non-native grassland and were also recorded during field surveys, such as fiddleneck (*Amsinckia* spp.), blue-eyed grass (*Sisyrinchium bellum*), cryptantha (*Cryptantha microstachys*), telegraph weed (*Heterotheca grandiflora*), and ragweed (*Ambrosia* spp.). This community comprises approximately three acres of the Project Site. As noted on page IV.C-29 of the Draft EIR, the proposed Project would impact approximately 1.9 acre of non-native grassland, which is not a regulatory status community, and impacts would be less than significant. The
### Table III-2
Changes in CDFG-Designated Vegetation Community Names

<table>
<thead>
<tr>
<th>Community on Project Site Described in Draft EIR</th>
<th>Functionally Analogous New Community Name&lt;sup&gt;a&lt;/sup&gt;</th>
<th>Increase in Sensitivity? (Yes/No)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scrub Communities</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Undifferentiated Chaparral Scrub</td>
<td>Chamise—black sage chaparral</td>
<td>No</td>
</tr>
<tr>
<td>Venturan Coastal Sage Scrub</td>
<td>California sagebrush—California buckwheat scrub</td>
<td>No</td>
</tr>
<tr>
<td>Coastal Sage Chaparral Scrub</td>
<td>Chamise—black sage—California sagebrush association</td>
<td>No</td>
</tr>
<tr>
<td>Disturbed Venturan Coastal Sage Scrub</td>
<td>California sagebrush—California buckwheat scrub</td>
<td>No</td>
</tr>
<tr>
<td>Mulefat Scrub</td>
<td>Mulefat thickets</td>
<td>No</td>
</tr>
<tr>
<td>Southern Willow Scrub*</td>
<td>Red willow—arroyo willow association*</td>
<td>No</td>
</tr>
<tr>
<td>Disturbed Mulefat Scrub</td>
<td>Mulefat thickets</td>
<td>No</td>
</tr>
<tr>
<td>Southern Willow Scrub/Mulefat Scrub*</td>
<td>Red willow—arroyo willow/mulefat association*</td>
<td>No</td>
</tr>
<tr>
<td>Grassland Communities</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Non-Native Grassland</td>
<td>Black mustard—ripgut grass association</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>Tocalote—black mustard association</td>
<td>No</td>
</tr>
<tr>
<td>Woodland and Forest Communities</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Western Sycamore—Coast Live Oak*</td>
<td>California sycamore—coast live oak association*</td>
<td>No</td>
</tr>
<tr>
<td>Western Sycamore Woodland/Willow Riparian Forest*</td>
<td>California sycamore—Fremont cottonwood/arroyo willow association*</td>
<td>No</td>
</tr>
<tr>
<td>California Walnut Woodland*</td>
<td>California walnut groves*</td>
<td>No</td>
</tr>
</tbody>
</table>

*Indicates “rare” community.

<sup>a</sup> Functionally analogous new vegetation community names are derived from the California Department of Fish and Game “Natural Communities List” dated September 2010.

Comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment No. 3-3

2. Vegetation and Rare Plant Mitigation—The DEIR states that DFG Protocol level surveys were conducted for rare plants on April 21 and December 16, 2004, August 11 and 25, 2005, May 2 and July 8, 2006, January 8, 2007, March 12, 2008, August 22 and 25, 2008, March 23 and 24, 2009, April 14, 2009, and June 5, 2009. The document indicates that all 119 acres of the Project Site were surveyed for during each site visit (Appendix C-6, page 8). An example of a site visit is March 12, when 2008 [sic] six biologists spent from 8am-11am conducting botanical surveys. This does not appear to be enough time to conduct protocol-level rare plant surveys as explained in the Department’s Rare Plant Survey Methodology (Attachment 1). The Protocol states that reference sites should be visited to ascertain whether or not certain plants are blooming. Additionally all rare plant surveys should be floristic in nature—meaning all species occurring on the property are recorded and since the entire property should be surveyed, transects are not appropriate per current protocol. Please expand on your rare plant survey methodology in the DEIR.

Response to Comment No. 3-3

The subject protocol referenced in the comment and attached to the comment states “that one person-hour per eight acres per survey date is needed for a comprehensive field survey...” (See “Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities,” CDFG, November 2009, page 4.) Based on this statement, approximately 15 hours would be needed to survey 119 acres per survey date. The total person-hours for the March 12, 2008, survey referenced in the comment was 18 hours, thereby surpassing the number of suggested survey hours.

The rare plant survey methodology is explained in detail in Section 2.0 on pages 7–11 of the Rare Plant Survey and Assessment for Forest Lawn Memorial-Park, Hollywood Hills, dated 31 August 2010 and attached as Appendix C-6 to the Draft EIR. As noted in the report, the methodology used for rare plant surveys generally follows CDFG’s Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (the protocol referenced in and attached to the comment). This protocol provides comprehensive guidelines for surveying and reporting CDFG “special status” plants and communities. All plants identified from the course of these surveys are presented in the Rare Plant Survey Report, Appendix A—Floral Species Observed. Plants were identified in the field by site investigators, with uncertain identifications confirmed by A. Sanders at the University of California, Riverside Herbarium.

Literature reviewed in determining vegetation community names and associations and descriptions for the Project area were derived from: The Jepson Manual, Higher Plants of California, Hickman, 1993, Preliminary Descriptions of the Terrestrial Natural Communities of California, Holland, 1986, and the CDFG List of Terrestrial Natural Communities, September 2003 Ed. Literature review also included a query of the State of
California Natural Diversity Database ("CNDDDB"). Also, the Jepson Manual and the California Native Plant Society’s ("CNPS") Inventory of Rare and Endangered Plants were used for background information for the rare plant species. CDFG’s CNDDDB was specifically queried for records of rare plant species in the Burbank, San Fernando, Sunland, Condor Peak, Van Nuys, Pasadena, Beverly Hills, Hollywood, and Los Angeles quadrangles.

As required by the CDFG protocol and United States Fish and Wildlife Service Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed and Candidate Plants, dated January 2000, the botanical field inventories include a description of soils present on the site, and the suitability of these soils to support rare plant species is discussed in the Rare Plant Survey Report. Geographic data is also presented in the Rare Plant Survey Report, including maps, locations of plants, and vegetation communities, which were produced and analyzed in ArcGIS. A handheld GPS unit (ca. 3m accuracy) was used to mark various point locations and to outline vegetation communities, with some correction using aerial photographs. As discussed above, a CNDDDB records search for the Project Site and adjacent eight topographic quadrangles was used to develop an initial list of potential special status plants, along with maps. Field investigators used these lists as a starting point for focal plant surveys; however, all plants encountered in the field were identified, including those not on the CNDDDB-generated list. Field investigations for special status plants were conducted in 2004–2009, and field botanical data has been collected during multi-disciplinary surveys annually within the Project Site from 1997 to the present. On all survey dates, field personnel traversed the approximately 119.8 acres of natural area on the Project Site on foot at transects spaced to adequately identify habitat types and species present. Weather conditions during the field surveys were favorable for detection of the species and are presented in the Rare Plant Survey Report. Precipitation on the site varied from year to year; however, it included several years of average to above average rainfall, thus making detection of some annuals better. Annual precipitation data was obtained from the National Weather Service.

Comment No. 3-4

The DEIR indicates that the proposed Project will remove 632 coast live oak trees (Quercus agrifolia), 59 western sycamore trees (Platanus racemosa), and 144 walnut trees (Juglans californica var. californica).

The DEIR states:

“Of the approximately 120 acres of native vegetation communities present on the Project Site, approximately 18.02 acres of vegetation communities locally designated as a Highest Inventory Community by the City of Los Angeles CEQA Thresholds Guide and/or identified as a CDFG Special Community (or the functional equivalent thereof) would be permanently impacted by the implementation of the proposed Project, including approximately
9.27 acres of western sycamore/coast live oak, approximately 7.64 acres of coast live oak woodland, approximately 0.62 acre of California walnut woodland, approximately 0.39 acre of southern willow scrub/mulefat scrub, approximately 0.05 acre of southern willow scrub, and approximately 0.05 acre of western sycamore/willow riparian forest. The loss of these regulatory status vegetation communities would be considered potentially significant prior to mitigation. As discussed below, implementation of the proposed mitigation program below, including Mitigation Measures C-1 through C-6, Mitigation Measure C-8 and Mitigation Measures C-15 through C-17, would reduce the impact to these regulatory status vegetation communities to a less than significant level.”

The Department is concerned that the referenced Mitigation Measures only describe tree replacement ratios and are mainly acorns or 1-gallon replacement plants on graded slopes within the Project or at an undisclosed location off of the Project site. The Department is concerned that solely using tree replacement ratios to re-create a sensitive plant community, and not recognizing the understory and other associated plants that occur in these communities, is not truly mitigating for the loss of a community. The Department recommends that the entire communities be mitigated and this includes the complete representation of herbs, forbs, shrubs, as well as trees to provide a mitigated habitat comparable to or better then the areas being impacted. Additionally, for the Department to be able to fully analyze whether or not the proposed mitigation is truly compensating for any impacts, the mitigation locations need to be identified - including any offsite areas the applicant is proposing to consider.

**Response to Comment No. 3-4**

In addition to addressing tree replacement ratios and replacement with acorns or 1-gallon plants, the mitigation measures referenced in the comment and included in the Draft EIR also address vegetation community replacement. Mitigation Measure C-2, for example, describes the creation, planting, and conservation of 23 acres of graded slopes on the Project Site with native plant communities such as woodland, chaparral, and scrub. Additionally, the proposed 1-acre Drainage L creation area and 1-acre restoration area adjacent to Sennett Creek will comprise a riparian vegetation community as well. The understory and other associated plants within these areas will be addressed in a habitat improvement and monitoring program, in accordance with a plan prepared by a qualified biologist/restoration ecologist, pursuant to Mitigation Measure C-6. The on-site mitigation locations are identified in Figure IV.C-5 of the Draft EIR.

With respect to off-site mitigation, Forest Lawn has entered into an agreement with the Mountains Recreation and Conservation Authority, a joint powers agency of the Santa Monica Mountains Conservancy, for the provision of off-site mitigation (creation/restoration of areas subject to CDFG and Army Corps jurisdiction) in the Los Angeles River watershed in connection with the Project by the Mountains Recreation and Conservation Authority. The resulting improvement to other currently degraded riparian systems in the Santa
Monica Mountains and Los Angeles River watershed would provide additional and better quality riparian habitat for plants and animals to successfully become established, resulting in tangible improvements to ecosystems and ecosystem subunits associated with the upper reaches of the Los Angeles River.

**Comment No. 3-5**

The DEIR states that four State Rare plants occur on-site, oscillated Humboldt lily (*Lilium humboldtii* ssp. *ocellatum*) (7 of 9 individuals on-site will be impacted), Catalina mariposa lily (*Calochortus catalinae*) (65 of 65 individuals on-site will be impacted), Southern California black walnut (*Juglans californica*) (144 of 198 individuals on-site will be impacted), and Coulter’s matilija poppy (*Romneya coulteri*) (15 of 15 ‘stalks’ on-site will be impacted). The DEIR indicates that the mitigation will include bulb salvage and seed collection (Mitigation Measure C-6 and 7) and revegetation of rare plants on manufactured, planted slopes. The Department does not considerer salvage of rare plants and seed collection as appropriate mitigation under CEQA for impacts to rare plants. The Department is also unclear which areas are being proposed to restore which habitat types. The Mitigation Measures indicate that 23 acres (MM C-2) and 8 acres (MM C-3) of graded slopes will be used to mitigate for impacts to plant communities and impacts to trees. Please clarify how the proposed rare plant salvage program coordinates with these mitigation measures. Also, the DEIR indicates that these areas will include fire and aesthetic buffers, but these acreages are not deducted from the mitigation total. Buffers, in particular fuel buffers, would not typically meet biological criteria to function as mitigation. Please clarify this in your document. Additional questions the Department has include a regional analysis of the rare plants and vegetation communities you are planning to impact. The DEIR indicates that all or a very significant portion of populations of rare plants are proposed for removal. Please identify where the other regional populations are located, and how the loss of the populations by the Project affects the species distribution. Please also consider where another location exists that can be considered for conservation as the Department does not consider salvage of plants as appropriate mitigation.

The Department does not believe the Mitigation Measures included in this DEIR for impacts to Special Vegetation Communities and Rare Plants have brought the proposed impacts to a level below significance.

**Response to Comment No. 3-5**

As explained on page IV.C-37 in Section IV.C, Biological Resources, of the Draft EIR, three regulatory status plant species or subspecies (Catalina mariposa lily, ocellated Humboldt lily, and Southern California black walnut) are confirmed present on the Project Site. Implementation of the proposed Project would result in the removal of approximately 65 individual Catalina mariposa lilies, 12 individual ocellated Humboldt lilies, and 144 Southern California black walnut trees. Under the City of Los Angeles CEQA
Thresholds Guide significance threshold, which addresses the loss of individuals and reduction of habitat, the potential impacts to these three plant species would be considered significant prior to mitigation. However, implementation of the mitigation measures provided in the Draft EIR, including Mitigation Measures C-1, C-2, and C-4 through C-7 would reduce all impacts to regulatory status plant species to a less-than-significant level. Pursuant to Mitigation Measure C-6, set forth on page IV.C-47 of the Draft EIR, a habitat improvement and monitoring program will be implemented for the conserved and restored areas on the Project Site described in Mitigation Measures C-1 through C-5 on pages IV.C-44 to IV.C-47 (and depicted in Figure IV.C-5, On-Site Mitigation Areas, on page IV.C-45 of the Draft EIR). The habitat improvement and monitoring program will include the selective revegetation of areas with the appropriate native plant species selected by a qualified biologist/restoration ecologist and based on analysis of existing high quality native habitat of the type to be restored. Pursuant to Mitigation Measure C-7, set forth on page IV.C-48 of the Draft EIR, Forest Lawn shall use reasonable efforts to salvage seeds and bulbs from Catalina mariposa lily, Southern California black walnut, and ocellated Humboldt lily to be used in a propagation program and used in the selective revegetation program as provided for in the plan described in Mitigation Measure C-6 prepared by a qualified biologist/restoration ecologist. Collected plant material which cannot be used on-site shall be dedicated to research institutions, herbaria, rare plant banks, conservation entities, and/or native plant nurseries skilled and actively engaged in the propagation of plant material to be utilized as deemed appropriate by that entity. The provision of rare plant specimens to such entities provides a range of uses for the material collected and furthers scientific study and preservation of future opportunities to perpetuate and ultimately protect the species. Thus, with implementation of the proposed mitigation measures, impacts to regulatory plant species would be reduced to a less than significant level.

Coulter’s matilija poppy, which was detected on the Project Site, is considered to be the result of its use as a cultivar. Coulter’s matilija poppy does not occur in the Santa Monica Mountains naturally. Although the entire stand of approximately 15 to 30 shoots would be impacted by Project implementation, this impact would not be significant, given that it is a cultivar. Accordingly, no mitigation is required.

Occurrences of rare plants which would be avoided by the proposed Project are identified in Exhibit 7—CNPS-Listed Plant Impacts—Proposed Project of the Rare Plant Survey Report attached as Appendix C-6 to the Draft EIR. Although rare plant occurrences on the Project Site would be impacted with implementation of the proposed Project, the effects to species distribution due to loss of populations, however, will be offset by implementation of Mitigation Measure C-7, as described above and set forth in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment No. 3-6

3. **Special Status Species Assessment**—The DEIR references California legless lizard and California mountain kingsnake, both California Species of Special Concern (CSSC), occur or have a high potential to occur on-site. Additionally, during mammal surveys, the San Diego desert woodrat, also a CSSC, was found on-site.

   a. The DEIR only includes pre-construction surveys and salvage and relocation for these CSSC. The Department does not believe this alone is suitable mitigation for species designated with the CSSC title.

Response to Comment No. 3-6

As explained on page IV.C-36 in Section IV.C, Biological Resources, of the Draft EIR, three regulatory status reptile species—California mountain kingsnake, coast horned lizard, and coast patchnose snake—have a moderate or high potential to occur on the Project Site, and one regulatory status reptile species—California legless lizard—is confirmed present on the Project Site. The proposed Project could remove up to 68.5 acres of habitat that is potentially occupied by the California mountain kingsnake, California legless lizard and coast patchnose snake, and up to 48.3 acres of habitat that is potentially occupied by coast horned lizard. This potential impact to up to four regulatory status reptile species could be considered potentially significant prior to mitigation. As explained on page IV.C-54 of the Draft EIR and set forth in Mitigation Measure C-10, prior to the commencement of grading activities, the Applicant shall retain a qualified biologist to conduct pitfall/funnel trapping and coverboard surveys for regulatory status reptiles within pending disturbance areas. Any regulatory status reptile species captured within pending disturbance areas would be relocated to areas not proposed for disturbance, and temporary exclusionary fencing would be installed to discourage relocated regulatory status reptile species from returning to construction areas. Even after relatively short periods of restoration, Project biologists have observed species, such as the California legless lizard, in existing restoration areas on the Project Site. This recolonization of restored areas by species of special concern demonstrates the success of this type of mitigation measure and would reduce potential impacts to a less-than-significant level.

Further, the proposed mitigation to relocate individuals from pending disturbance areas to habitat areas not proposed for disturbance is coupled with mitigation measures providing for the re-creation and restoration of habitat that is suitable to support these species. Mitigation Measures C-1 through C-6, C-15, C-16, and C-18, are also identified in the Draft EIR (see page IV.C-36) as measures that would reduce potential Project impacts to less-than-significant levels. Mitigation Measures C-1 through C-6 provide for the conservation, restoration, and creation of natural habitat areas on the Project Site, and a five-year habitat improvement and monitoring program for the conserved areas on the Project Site. Mitigation Measures C-15 and C-16 provide for fencing at the interface of...
Project development areas and conserved natural areas. In addition, Mitigation Measure C-18 requires that all grading and construction contractors shall receive copies of all mitigation measures required to reduce impacts to biological resources. Additionally, verbal instruction shall be provided by Forest Lawn to all site workers to insure clear understanding that biological resources are to be protected on the Project Site in accordance with the mitigation measures. A brochure depicting the sensitive biological resources on-site shall be provided to all grading and construction contractors. As the Draft EIR concludes on pages IV.C-36 and IV.C-54, implementation of the proposed mitigation measures would reduce the potential impacts to regulatory status reptile species to a less-than-significant level.

The Draft EIR also explains on page IV.C-36 that one regulatory status small mammal species, San Diego desert woodrat, has been confirmed present on the Project Site, and the ringtail has a moderate likelihood of occurrence. The proposed Project could remove up to 48.3 acres of habitat that is potentially occupied by San Diego desert woodrat, and up to 68.5 acres of habitat that is potentially occupied by ringtail. This potential impact to up to two regulatory status small mammal species could be considered potentially significant prior to mitigation. However, as explained on pages IV.C-36 and IV.C-55 of the Draft EIR, Mitigation Measures C-1 through C-6, which, as noted above, provide for the conservation, restoration, and creation of natural habitat areas on the Project Site, and a 5-year habitat improvement and monitoring program for the conserved areas on the Project Site, would mitigate the Project’s impacts to regulatory status mammal species. As noted above, even after relatively short periods of restoration, Project biologists have observed species, such as the San Diego desert woodrat and California legless lizard, in existing restoration areas on the Project Site. This recolonization of restored areas by species of special concern demonstrates the success of this type of mitigation measure and would reduce potential impacts to a less-than-significant level. The proposed mitigation to relocate individuals from pending disturbance areas to habitat areas not proposed for disturbance is coupled with mitigation measures providing for the re-creation and restoration of habitat that is suitable to support these species.

In addition, Mitigation Measures C-15 and C-16, which provide for fencing at the interface of Project development areas and conserved natural areas, would also mitigate impacts to regulatory status mammal species. In addition, as explained above, Mitigation Measure C-18 requires that all grading and construction contractors shall receive copies of all mitigation measures required to reduce impacts to biological resources, verbal instruction regarding the protection of biological resources on the Project Site, and a brochure depicting the sensitive biological resources on-site shall be provided to all grading and construction contractors. As the Draft EIR concludes on pages IV.C-36 and IV.C-55, implementation of the proposed mitigation measures above would reduce the impacts to regulatory status small mammal species to a less-than-significant level.
Comment No. 3-7

4. **Impact to Bats**—The DEIR states that western red bat, pallid bat, spotted bat, and western mastiff bat, all California Species of Special Concern, have the potential to occur on-site.

   a. It does not appear any survey work to assess the presence and use of this site by bats was conducted. The Department recommends surveys be conducted and the results be included in the DEIR so a full analysis on impacts to these species, as well as specific mitigation proposed can be evaluated.

   b. The DEIR does include preconstruction surveys (MM C-12 and C-13) for bats and maternity roosts. However, the mitigation proposed for any ‘regulatory status bats’ found within the Project footprint and a 100-foot buffer is passive relocation. The DEIR also states that if any maternity bat roosts are found within the Project footprint and a 100-foot buffer they will be avoided until not in use anymore and then impacted. The Department is concerned about the loss of bat habitat and roosting habitat and recommends additional analysis and mitigation, other than solely relying on passive relocation. If maternity bat roosts are found on-site, the Department recommends a minimum 300-foot buffer be established to protect the roost from construction-related disturbances. The Department also recommends conservation of bat habitat and roosting habitat for these CSSC.

Response to Comment No. 3-7

The comment suggests that the EIR should include surveys for the presence of bat species within the Project Site and that surveys are necessary in order to propose mitigation measures. The General Biological Assessment (attached as Appendix C-1 to the Draft EIR) and Section IV.C, Biological Resources, of the Draft EIR, address the regulatory status bat species with potential to occur on the Project Site. Bat species that were considered are the pallid bat, Mexican long-tongued bat, Townsend’s big-eared bat, spotted bat, western mastiff bat, western red bat, western yellow bat, California leaf-nosed bat, cave myotis, pocket free-tailed bat, and big free-tailed bat. (See pages 62–65 of the General Biological Assessment.) As explained on page IV.C-23 of the Draft EIR, the evaluation for presence of regulatory status organisms included such variables as availability of support resources (such as rock outcrops, surface water, specific host plants, and nesting sites), the location and size of the Project Site, and the history of disturbance. The likelihood of potential occurrences is further predicated on the known distribution of species and their overall habitat requirements and preferences.

As explained on page 20 of the General Biological Assessment, a species was determined to have a low probability of occurrence on the Project Site if the Project Site is within the historic range or distribution of the species, and habitat on the Project Site is
marginal to suitable, but other conditions may exist (adjacent urbanization, isolation, etc.) to suggest a low probability of occurrence. Transitory presence is not necessarily precluded, but site conditions are such that sustained or seasonal presence is unlikely. A species was determined to have a moderate potential of occurrence on the Project Site if the Project Site is within the historic range or distribution of the species, the species has a reasonable possibility of occurrence within the Project Site, habitats are suitable, and the species is known to occur in the area. Some areas of habitat may be slightly altered or degraded from the original condition, but overall conditions are such that sustained or seasonal presence is possible. As explained on page 21 of the General Biological Assessment, a species was determined to have a high potential of occurrence on the Project Site if the Project Site is within the historic range or distribution of the species, the Project Site contains suitable to very favorable habitat for the species, and the organism has recently been recorded in the vicinity, or ecological conditions are such that qualified personnel can reasonably anticipate presence.

The Mexican long-tongued bat, Townsend’s big-eared bat, and western yellow bat were determined to have a low probability to occur on-site. The cave myotis was determined not to occur on the Project Site. As noted on page IV.C-37 of the Draft EIR, one regulatory status bat species, western red bat, was determined to have a high likelihood of occurrence on the Project Site. The western red bat is considered a species of special concern, second priority by the CDFG. Three regulatory status bat species, pallid bat, spotted bat, and western mastiff bat, were determined to have a moderate likelihood of occurrence on the Project Site. For purposes of the analysis, the Draft EIR conservatively assumed that these four regulatory status bat species (those with a moderate to high likelihood of occurrence on the Project Site) would be potentially impacted by the proposed Project. As noted on page IV.C-37 and on Table IV.C-2 on pages IV.C-31 to IV.C-33 of the Draft EIR, the proposed Project could remove up to 17.6 acres of habitat that is potentially occupied by western red bat, pallid bat, and western mastiff bat, and up to 17 acres that is potentially occupied by spotted bat. This potential impact to up to four regulatory status bat species could be considered potentially significant prior to mitigation. However, implementation of the mitigation measures provided in the Draft EIR, including Mitigation Measures C-1 through C-6, C-12, C-13, C-15, C-16, C-18, and C-19, would reduce the potential impacts to these four regulatory status bat species to a less-than-significant level. In particular, Mitigation Measures C-12 and C-13 would require pre-construction surveys for regulatory status bat roosts and for maternity roosts during the maternity roosting season prior to Project-related clearing, grubbing, demolition, and/or tree removal. As the mitigation measures will be implemented based on the moderate to high likelihood of these four regulatory status bat species occurring within the Project Site, no surveys were conducted or determined to be necessary to confirm their presence or absence.

In addition, bat species designated as Special Animals by CDFG were evaluated for potential presence on the Project Site and are set forth in Appendix E to the General
Biological Assessment. These Special Animal bat species include: silver-haired bat, hoary bat, small-footed myotis, long-eared myotis, fringed myotis, and Yuma myotis. (See pages E-4 and E-5 of Appendix E to the General Biological Assessment.) The hoary bat and Yuma myotis were both determined to have a high likelihood of occurrence on the Project Site; the small-footed myotis was determined to have a moderate likelihood of occurrence on the Project Site; and the others were determined to have a low probability of occurrence on the Project Site. As explained in footnote 19 on page IV.C-35 of the Draft EIR, neither CEQA nor the City of Los Angeles CEQA Thresholds Guide requires an assessment of impacts to Special Animals; accordingly, any potential impacts to these species would be less than significant. Nevertheless, any potential impacts to Special Animals would be reduced with the implementation of the mitigation measures set forth in Section IV.C of the Draft EIR and described above.

The Project’s mitigation program includes the conservation of natural habitat areas on the Project Site, the enhancement and restoration of preserved natural areas on the Project Site, and the creation of over 30 acres of native plant communities on the Project Site on graded slopes. In addition, the proposed habitat improvement program includes the creation of potential bat roosting habitat through the installation and maintenance of three bat houses in suitable locations on the Project Site. As noted in the Draft EIR and in the comment, Mitigation Measures C-12 and C-13 also address potential impacts to bats and require pre-construction surveys for bat roosts and maternity roosts within the disturbance footprint plus a 100-foot buffer area. If regulatory status bats are found, they would be passively relocated under the supervision of a qualified biologist. If active maternity roosts are found, a no-disturbance buffer zone would be established around them until a qualified biologist determines the maternity roost is no longer occupied. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 3-8

5. Impacts to Native Bird Species—The Project Site supports nesting habitat for native birds that will be impacted by the proposed Project: The IS recommends bird surveys be conducted commencing February 15.

a. Commencing bird surveys on February 15 may miss early nesting raptor species. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA).

b. Proposed Project activities (including disturbances to native and non-native vegetation, demolition of structures and substrates) should take place outside of the
breeding bird season which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86).

c. If avoidance of the breeding bird season is not feasible, the Department recommends that beginning thirty days prior to the disturbance of suitable nesting habitat, the Project proponent should arrange for weekly bird surveys to detect protected native birds occurring in the habitat that is to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys should be conducted by a qualified biologist with experience in conducting breeding bird surveys. The surveys should continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of clearance/construction work. If a protected native bird is found, the Project proponent should delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the qualified biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, must be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. Limits of construction to avoid a nest should be established in the field with flagging and stakes or construction fencing marking the protected area 300 feet (or 500 feet) from the nest. Construction personnel should be instructed on the sensitivity of the area. The Project proponent should record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds.

Response to Comment No. 3-8

Pursuant to Mitigation Measure C-11, set forth on page IV.C-51 of Section IV.C, Biological Resources, of the Draft EIR, if Project grading and construction activities requiring the removal of vegetation occur during the breeding season for birds, nesting bird surveys shall be conducted within the disturbance footprint plus a 100-foot buffer in accordance with the following:

a. A minimum of 2 pre-construction surveys for nesting birds shall be conducted 5 days apart prior to construction. The last survey shall be conducted no more than 3 days prior to the initiation of clearance/construction work;

b. If pre-construction surveys indicate that bird nests are not present or are inactive, or if potential habitat is unoccupied, no further mitigation is required;
c. If active nests of birds are found during the surveys, a species-specific no-disturbance buffer zone shall be established by a qualified biologist around active nests until a qualified biologist determines that all young have fledged (no longer reliant upon the nest).

Implementation of Mitigation Measure C-11 would reduce the Project’s potential impacts to up to three regulatory status bird species (Cooper’s hawk, yellow warbler, and Southern California rufous-crowned sparrow as stated on page IV.C-36 of the Draft EIR) to a less-than-significant level. (See page IV.C-54 of the Draft EIR.) Seasonal surveys, including over-wintering bird surveys and early season nesting surveys, are intended to sample avian presence. Nesting surveys are comprised of several intervals throughout the season, not a single survey; therefore, a late January or early February interval is unnecessary, given the typical duration of nesting for early nesting species, such as raptors. In cismontane Southern California, February 15 is widely recognized as a suitable date to begin nesting surveys for early season nesters, as it is approximately six to seven weeks prior to the official start of spring in the calendar year. Surveys conducted too early in the season can detect over-wintering birds and early breeding behaviors that can mislead biologists as to actual nesting activities on the site. For these reasons, February 15 is an appropriate starting date for nesting bird surveys. In addition, pursuant to Mitigation Measure C-14, set forth on page IV.C-52 of the Draft EIR, Forest Lawn shall retain a qualified biologist to monitor grading activities on the Project Site. The qualified biological monitor shall ensure compliance with the mitigation measures and would be on-site throughout the year during all activities with a potential to affect nesting birds. The qualified biological monitor would have the authority to suspend, direct, or halt grading activities to avoid affecting nesting birds.

As a matter of standard industry practice, biologists initiate surveys within the disturbance footprint early in the morning, prior to construction activities beginning, to maximize detection results prior to the commencement of construction activities. Buffers of 100 feet or less are often sufficient in instances where resident birds have become accustomed or habituated to human presence. However, as noted above in subsection c of Mitigation Measure C-11, if active nests of birds are found during the surveys, a species-specific no-disturbance buffer zone shall be established by a qualified biologist. Accordingly, in the event that an active bird nest is detected, the appropriate buffer would be determined on a case-by-case basis. Finally, any permit, authorization, or agreement for the Project issued by CDFG would include conditions applicable to and suitable for the Project Site and would further ensure compliance with the Migratory Bird Treaty Act.

The comments are noted and will be incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment No. 3-9

6. Preferred Alternative—The DEIR identifies Alternative 4 as the Environmentally Superior Alternative, but the Project as proposed does not utilise [sic] this alternative.

   a. The Department recommends further consideration of Alternative 4, which brings the total usable space to 103 acres and impacts only 4.15 acres of jurisdictional drainages compared with the preferred alternative which has a total usable space of 110 acres and impacts 7.94 acres of jurisdictional drainages.

   b. Additionally, Alternative 4 would significantly reduce the impacts to rare plants, rare vegetation communities, and riparian resources and states only 339 protected trees of the 835 proposed to be impacted by the preferred alternative will be impacted. The Department supports the further investigation of Alternative 4 to reduce the level of environmental impact from this Project.

Response to Comment No. 3-9

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. As the Draft EIR explains, and as the comment notes, in accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that Alternative 4: Reduced Project with Preservation of Drainages D, D1, F, F1, and H would be the Environmentally Superior Alternative. This Alternative would reduce more of the Project impacts than any of the other remaining alternatives. However, as the Draft EIR notes, this Alternative would meet several of the Project objectives to a lesser degree than the proposed Project. (See page VI-62 of the Draft EIR.) Also refer to Section II, Corrections and Additions, of this Final EIR, subsection V. Alternatives for an updated description of Alternative 4 and the updated jurisdictional acreage numbers for the Project and the Alternatives.

Comment No. 3-10

7. A thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts should be included. Total acres of the proposed action area should be included in the impact discussion. This discussion should focus on maximizing avoidance, and minimizing impacts.

   a. CEQA Guidelines, Section 15125(a), direct that knowledge of the regional setting is critical to an assessment of environmental impacts and that special emphasis should be placed on resources that are rare or unique to the region.
III. Responses to Comments

Response to Comment No. 3-10

A discussion of direct, indirect and cumulative impacts expected to adversely affect biological resources with specific measures to offset such impacts are included in the Draft EIR, as well as the General Biological Assessment and other biological reports included as appendices to the Draft EIR. Figure IV.C-4, Affected Vegetation Communities, of the Draft EIR shows that the total Project grading footprint is approximately 146 acres, approximately 70.4 acres of which are natural areas. The Draft EIR and General Biological Assessment also include a discussion of the regional setting and give special emphasis to rare or unique resources to the region. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 3-11

b. Project impacts should also be analyzed relative to their effects on off-site habitats and populations. Specifically, this should include nearby public lands, open space, adjacent natural habitats, and riparian ecosystems. Impacts to and maintenance of wildlife corridor/movement areas, including access to undisturbed habitat in adjacent areas are of concern to the Department and should be fully evaluated and provided. The analysis should also include a discussion of the potential for impacts resulting from such effects as increased vehicle traffic, outdoor artificial lighting, noise and vibration.

Response to Comment No. 3-11

The Draft EIR describes nearby public lands, open space, adjacent natural habitats, and riparian ecosystems. In particular, the Draft EIR discusses the area of natural open space consisting of approximately 3,700 acres south of State Highway 134, east of Barham Boulevard, west of Interstate 5, and north of the southern boundary of Griffith Park. As the Draft EIR explains, in addition to Griffith Park natural areas, this area includes undeveloped areas of the Project Site, and other privately owned properties in the Cahuenga Peak/Mt. Lee area and is surrounded by the developed urban area. (See Section IV.C, Biological Resources, of the Draft EIR, page IV.C-20.) The Draft EIR notes that this area of natural habitat is largely isolated, with no connective habitat to natural areas west of the Hollywood Freeway, and that no discernable corridors or critical pathways for terrestrial wildlife have been identified. (See page IV.C-39 of the Draft EIR.) The Draft EIR describes the south and north slopes of the Hollywood Hills and notes that habitat generalists such as mule deer and coyote move freely between the various community types. (See Draft EIR page IV.C-20.) In addition, the Draft EIR notes that a number of common, urban-adapted species, such as Virginia opossum, northern raccoon, mule deer, and coyote, can be found outside of the natural habitat block within the developed/cemetery portion of the Project Site, which contains low levels of evening light, closes at night, and provides urban-tolerant species with foraging area. (See page IV.C-19 of the Draft EIR.)
As explained in the cumulative impacts discussion in the Biological Resources Section of the Draft EIR, although Griffith Park and other undeveloped lands are directly south, east and west of the Project Site, the other surrounding areas are highly urbanized and would be rarely used by wildlife other than those adapted to urban environments. The functional natural habitat within the Project Site is at the edge of the Hollywood Hills/Griffith Park habitat complex, and the 70.42 acres of natural areas on the Project Site that would be impacted by the proposed Project comprise just 1.9 percent of the approximate 3,700-acre area of remnant natural habitat in the easternmost Santa Monica Mountains. Thus, the Project Site does not function as a “macro-corridor” for biological resources. This relatively small area that would be affected by the proposed Project (in comparison to the approximately 3,700-acre habitat block) would support a proportionally small amount of wildlife movement. Thus, barriers or impediments to movement in this small area would not preclude or eliminate animal movement on the north slope of the Santa Monica Mountains/Hollywood Hills, and impacts associated with wildlife movement would be less than significant. (See pages IV.C-39 and IV.C-40 of the Draft EIR.) Further, the 3,700-acre block of relatively natural habitat is, in itself, largely isolated, lacking any connective habitat to natural areas west of the Hollywood Freeway. Nor have corridors or critical pathways for terrestrial wildlife been identified. While birds and highly mobile animals may be able to traverse the Cahuenga Pass, the Project Site is not considered to be a major wildlife movement corridor, especially given the highly urbanized condition of its surroundings. (See page IV.C-43 of the Draft EIR.) As discussed in the Draft EIR, the proposed Project would not have a significant impact on biological resources (including vegetation communities, regulatory status animal or plant species, protected trees, or jurisdictional features) with implementation of the proposed mitigation program. Any impacts to biological resources similar to those impacted by the proposed Project as a result of the related projects would likely be subject to mitigation, resulting in less-than-significant impacts for those related projects as well. (See page IV.C-43 of the Draft EIR.) Thus, the Project’s potential cumulative impacts with respect to biological resources would be less than significant.

The Draft EIR explains on page IV.C-20 that Sennett Creek originally was comprised of oak/sycamore dominated riparian woodland that stretched from the Los Angeles River upward into what is now called Royce’s Canyon in Griffith Park. Prior to 1940, Sennett Creek was one of many ecologically functional tributaries to the Los Angeles River. With the channelization of the Los Angeles River, Sennett Creek has been truncated. Portions of the creek have been affected by historic development of the Project Site as well; however, those previously affected sections have been largely restored and are now comprised of mixed willow riparian scrub intermixed with newly established sycamores, cottonwoods, and coast live oaks. (See Section IV.C, Biological Resources, of the Draft EIR, page IV.C-20.) Currently, Sennett Creek provides habitat and cover for riparian-dwelling and stream-dependent organisms, but it has no direct ecological connection with the Los Angeles River, as it once did. As such, it provides a water source and a movement area for animals like mule deer, long-tailed weasel (Mustela frenata), bobcat (Lynx rufus)
and northern raccoon; however, its functions with regard to connectivity into greater Los Angeles River–associated habitats have been largely eliminated due to the current condition of the River and the extensive conversion of habitats throughout the San Fernando Valley. Moreover, regulatory status organisms that once might have used the river to access other tributary stream systems (such as anadromous fish species, California red-legged frog [Rana draytonii], and regulatory status small mammals like Los Angeles pocket mouse [Perognathus longimembris brevinasus] and perhaps kangaroo rats [Dipodomys spp.]) now are in decline or absent. Therefore, while organisms now present in the area most likely do venture into Sennett Creek for water and for cover, they do not do so in a manner consistent with the actual role of wildlife corridors. (See page IV.C-22 of the Draft EIR.)

As explained in the Draft EIR, the proposed Project would impact approximately 12 acres of riparian-associated habitats (e.g., western sycamore/coast live oak, western sycamore/willow riparian forest, southern willow scrub, mulefat scrub, southern willow scrub/mulefat scrub, and disturbed mulefat scrub) on the Project Site. Sennett Creek would be avoided by the proposed Project, with the exception of 0.33 acre of “streambeds” that would be affected by a proposed culvert crossing similar in design to existing road crossings, though the new crossing would be soft-bottomed to further reduce impacts. Most of the Sennett Creek tributaries which would be affected by Project development do not contain surface water during summer months, although the lower reaches of Sennett Creek appear to support surface water each year. During summer months when water is scarce and found mostly in lower elevation areas, the preservation of Sennett Creek should provide adequate water resources. Though approximately 12 acres of riparian-associated habitat would be removed and animal movement through several drainages on the Project Site would be impeded with implementation of the proposed Project, the proposed Project would not create a substantial barrier to animal movement given the small area of the larger habitat complex that would be affected. Furthermore, the existing impaired connectivity to the Los Angeles River via Sennett Creek and its tributaries, which provide habitat and cover but no longer have direct ecological connection with the Los Angeles River, would remain in place. Please refer to Response to Comment No. 3-5 for additional information. Implementation of the proposed mitigation measures described in Section IV.C of the Draft EIR, including Mitigation Measures C-1 through C-6, C-10 through C-16, and C-18 through C-19, would be expected to further reduce impacts, resulting in an overall impact with respect to animal movement that would not be significant. (See page IV.C-40 of the Draft EIR.) The Addendum Biological Analysis of the Proposed Off-Site Basin Areas for the Forest Lawn Memorial-Park, Hollywood Hills Master Plan within the City of Los Angeles, California, dated 31 August 2010, attached as Appendix C-10 of the Draft EIR, addressed direct impacts associated with the proposed installation of three debris basins to Griffith Park. Mitigation Measure C-20, set forth on page IV.C-53 of the Draft EIR, provides for the mitigation of potential impacts from construction of detention basins which are located partially off-site on Griffith Park at a 2:1 ratio, including the restoration with similar habitat types and protected tree replacement.
As explained in Section IV.J, Traffic, Circulation, and Parking, of the Draft EIR, based on the stability in the number of interments that have occurred at the Forest Lawn Memorial-Park–Hollywood Hills property over the last decade, trip generation is expected to continue to be stable over the life of the Project. No additional growth in trip generation beyond current levels is anticipated. Accordingly, the Draft EIR concluded that no increase in trip generation, including with the Project, is anticipated.

With respect to lighting, as noted in the Draft EIR, the developed memorial-park contains low levels of evening light and closes at night. Nevertheless, pursuant to Mitigation Measure C-19, set forth on page IV.C-53 of the Draft EIR, all lighting adjacent to natural areas shall be of low luminescence, directed downward or toward structures, and shielded to the extent necessary to prevent artificial illumination of natural areas and protect nocturnal biological resources, as determined appropriate by a qualified biologist.

Potential effects associated with noise and vibration are addressed on page 66 of the General Biological Assessment, attached as Appendix C-1 to the Draft EIR. As explained therein, a number of studies have been conducted regarding the effects of noise and vibration from construction activities on carnivores, raptors, and large ungulates (e.g., caribou and moose [*Alces alces]*) in connection with mining and oil and gas exploration and military construction, extraction and delivery on military ranges. These studies have shown that the effects of noise and vibration on wildlife from such activities are not substantial. In addition, it is generally accepted that most wildlife become accustomed to urban noise, and the wildlife in the vicinity of the Project Site are in an area that is already subject to urban noise and similar disturbances. Natural tectonic events (earthquakes) are likely to far exceed the intensity and frequency of blasting events. Given the limited number and instantaneous nature of controlled blasting events, as well as the documented general adaptability of wildlife to urban noise and vibrations, no significant impacts are expected to occur in connection with Project grading and construction.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 3-12**

c. Impacts to migratory wildlife affected by the Project should be fully evaluated including proposals to remove/disturb native and ornamental landscaping and other nesting habitat for native birds. Impact evaluation may also include such elements as migratory butterfly roost sites and neo-tropical bird and waterfowl stop-over and staging sites. All migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of birds and their active nests, including raptors and other migratory nongame birds as listed under the MBTA.
d. Proposed Project activities (including disturbances to vegetation) should take place outside of the breeding bird season (February 1–September 1) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). If Project activities cannot avoid the breeding bird season, nest surveys should be conducted and active nests should be avoided and provided with a minimum buffer as determined by a biological monitor (the Department recommends a minimum 500-foot buffer for all active raptor nests).

Response to Comment No. 3-12

The issues raised in this comment have been raised earlier in this letter. Please refer to Response to Comment No. 3-8 for additional information.

Comment No. 3-13

8. An Incidental Take Permit from the Department may be required if the Project, Project construction, or any Project-related activity during the life of the Project will result in “take” as defined by the Fish and Game Code of any species protected by CESA. (Fish & G. Code, §§86, 2080, 2081, subd. (b), (c).) Early consultation with Department regarding potential permitting obligations under CESA with respect to the Project is encouraged. (Cal. Code Regs., tit. 14, § 783.2, subd. (b).) It is imperative with these potential permitting obligations that the draft environmental document prepared by the Lead Agency under CEQA in the present case includes a thorough and robust analysis of the potentially significant impacts to endangered, rare, and threatened species, and their habitat, that may occur as a result of the proposed Project. For any such potentially significant impacts the Lead Agency should also analyze and describe specific, potentially feasible mitigation measures to avoid or substantially lessen any such impacts as required by CEQA and, if an ITP is necessary, as required by the relevant permitting criteria prescribed by Fish and Game Code section 2081, subdivisions (b) and (c). The failure to include this analysis in the Project environmental document under CEQA could preclude the Department from relying on the Lead Agency’s analysis to issue an ITP without the Department first conducting its own, separate lead agency subsequent or supplemental analysis for the Project. (See, e.g., Cal. Code Regs., tit. 14, § 15096, subd. (f); Pub. Resources Code, § 21166.) For these reasons, the following information is requested:

a. Biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA Permit.

b. A Department-approved Mitigation Agreement and Mitigation Plan are required for plants listed as rare under the Native Plant Protection Act.
Response to Comment No. 3-13

No endangered or threatened species will be affected by Project implementation, and a California Endangered Species Act permit is not required. As discussed in Response to Comment No. 3-5, rare plant species will be impacted by Project implementation, and mitigation measures have been included in the Draft EIR to address impacts to rare plant species. Early consultation with CDFG regarding the proposed Project and potential impacts has occurred, and the Applicant will continue to coordinate with CDFG staff. The Draft EIR and appended technical reports include a thorough analysis of potentially significant impacts as well as mitigation measures to avoid or substantially lessen such impacts, and a mitigation plan will be prepared to the satisfaction of CDFG in connection with the Streambed Alteration Agreement requested for the Project. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 3-14

9. The Department opposes the elimination of watercourses (including concrete channels, blue line streams and other watercourses not designated as bloodline streams on USGS maps) and/or the canalization of natural and manmade drainages or conversion to subsurface drains. All wetlands and watercourses, whether intermittent, ephemeral, or perennial, must be retained and provided with substantial setbacks which preserve the riparian and aquatic habitat values and maintain their value to on-site and off-site wildlife populations. The Department recommends a minimum natural buffer of 100 feet from the outside edge of the riparian zone on each side of drainage.

Response to Comment No. 3-14

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 3-15

a. The Department also has regulatory authority with regard to activities occurring in streams and/or lakes that could adversely affect any fish or wildlife resource. For any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) or a river or stream or use material from a streambed, the Project applicant (or “entity”) must provide written notification to the Department pursuant to Section 1602 of the Fish and Game Code. Based on this notification and other information, the Department then determines whether a Lake and Streambed Alteration (LSA) Agreement is required. The Department’s issuance of an LSA is a Project subject to CEQA. Early consultation is recommended, since modification of the proposed Project may be required to avoid or reduce impacts to fish and wildlife resources. Again, the failure to include this analysis in the Project
environmental document under CEQA could preclude the Department from relying on the Lead Agency’s analysis to issue an Agreement without the Department first conducting its own, separate lead agency subsequent or supplemental analysis for the Project.

Response to Comment No. 3-15

A Streambed Alteration Agreement Notification Application was submitted to CDFG on 16 November 2010 and was attached to the Draft EIR as Appendix C-14. In addition, the Preliminary Determination of CDFG “Streambeds” Jurisdiction and Impact Analysis report was attached to the Draft EIR as Appendix C-8. Early consultation with CDFG regarding the proposed Project and potential impacts has occurred, and the Applicant will continue to coordinate with CDFG staff. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 3-16

Thank you for this opportunity to provide comments. Please contact Ms. Kelly Schmoker, Staff Environmental Scientist, at (626) 848-8382 if you should have any questions and for further coordination on the proposed Project.

Response to Comment No. 3-16

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 3-17

Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities

State of California
California Natural Resources Agency
Department of Fish and Game
November 24, 2009

1 This document replaces the DFG document entitled “Guidelines for Assessing the Effects of Proposed Projects on Rare, Threatened and Endangered Plants and Natural Communities.”
INTRODUCTION AND PURPOSE

The conservation of special status native plants and their habitats, as well as natural communities, is integral to maintaining biological diversity. The purpose of these protocols is to facilitate a consistent and systematic approach to the survey and assessment of special status native plants and natural communities so that reliable information is produced and the potential of locating a special status plant species or natural community is maximized. They may also help those who prepare and review environmental documents determine when a botanical survey is needed, how field surveys may be conducted, what information to include in a survey report, and what qualifications to consider for surveyors. The protocols may help avoid delays caused when inadequate biological information is provided during the environmental review process; assist lead, trustee and responsible reviewing agencies to make an informed decision regarding the direct, indirect, and cumulative effects of a proposed development, activity, or action on special status native plants and natural communities; meet California Environmental Quality Act (CEQA) requirements for adequate disclosure of potential impacts; and conserve public trust resources.

DEPARTMENT OF FISH AND GAME TRUSTEE AND RESPONSIBLE AGENCY MISSION

The mission of the Department of Fish and Game (DFG) is to manage California’s diverse wildlife and native plant resources, and the habitats upon which they depend, for their ecological values and for their use and enjoyment by the public. DFG has jurisdiction over the conservation, protection, and management of wildlife, native plants, and habitat necessary to maintain biologically sustainable populations (Fish and Game Code §1802). DFG, as trustee agency under CEQA §15386, provides expertise in reviewing and commenting on environmental documents and makes protocols regarding potential negative impacts to those resources held in trust for the people of California.

Certain species are in danger of extinction because their habitats have been severely reduced in acreage, are threatened with destruction or adverse modification, or because of a combination of these and other factors. The California Endangered Species Act (CESA) provides additional protections for such species, including take prohibitions (Fish and Game Code §2050 et seq.). As a responsible agency, DFG has the authority to issue permits for the take of species listed under CESA if the take is incidental to an otherwise lawful activity; DFG has determined that the impacts of the take have been minimized and fully mitigated; and, the take would not jeopardize the continued existence of the species.

2 http://ceres.ca.gov/ceqa/
(Fish and Game Code §2081). Surveys are one of the preliminary steps to detect a listed or special status plant species or natural community that may be impacted significantly by a project.

**DEFINITIONS**

Botanical surveys provide information used to determine the potential environmental effects of proposed projects on all special status plants and natural communities as required by law (i.e., CEQA, CESA, and Federal Endangered Species Act (ESA)). Some key terms in this document appear in **bold font** for assistance in use of the document.

For the purposes of this document, **special status plants** include all plant species that meet one or more of the following criteria:3

- Listed or proposed for listing as threatened or endangered under ESA or candidates for possible future listing as threatened or endangered under the ESA (50 CFR §17.12).

- Listed4 or candidates for listing by the State of California as threatened or endangered under CESA (Fish and Game Code §2050 et seq.). A species, subspecies, or variety of plant is **endangered** when the prospects of its survival and reproduction in the wild are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, over-exploitation, predation, competition, disease, or other factors (Fish and Game Code §2062). A plant is **threatened** when it is likely to become endangered in the foreseeable future in the absence of special protection and management measures (Fish and Game Code §2067).

- Listed as rare under the California Native Plant Protection Act (Fish and Game Code §1900 et seq.). A plant is **rare** when, although not presently threatened with extinction, the species, subspecies, or variety is found in such small numbers throughout its range that it may be endangered if its environment worsens (Fish and Game Code §1901).

- Meet the definition of rare or endangered under CEQA §15380(b) and (d). Species that may meet the definition of rare or endangered include the following:

---

3 Adapted from the East Alameda County Conservation Strategy available at http://www.fws.gov/sacramento/EACCSIDocuments/080228 Species Evaluation EACCS.pdf

4 Refer to current online published lists available at: http://www.dfg.ca.gov/biogeodata.
- Species considered by the California Native Plant Society (CNPS) to be “rare, threatened or endangered in California” (Lists 1A, 1B and 2);

- Species that may warrant consideration on the basis of local significance or recent biological information;\(^5\)

- Some species included on the California Natural Diversity Database’s (CNDDB) Special Plants, Bryophytes, and Lichens List (California Department of Fish and Game 2008).\(^6\)

- Considered a **locally significant species**, that is, a species that is not rare from a statewide perspective but is rare or uncommon in a local context such as within a county or region (CEQA §15125 (c)) or is so designated in local or regional plans, policies, or ordinances (CEQA Guidelines, Appendix G). Examples include a species at the outer limits of its known range or a species occurring on an uncommon soil type.

**Special status natural communities** are communities that are of limited distribution statewide or within a county or region and are often vulnerable to environmental effects of projects. These communities may or may not contain special status species or their habitat. The most current version of the Department’s List of California Terrestrial Natural Communities\(^7\) indicates which natural communities are of special status given the current state of the California classification.

Most types of wetlands and riparian communities are considered special status natural communities due to their limited distribution in California. These natural communities often contain special status plants such as those described above. These protocols may be used in conjunction with protocols formulated by other agencies, for example, those

---

\(^5\) In general, CNPS List 3 plants (plants about which more information is needed) and List 4 plants (plants of limited distribution) may not warrant consideration under CEQA §15380. These plants may be included on special status plant lists such as those developed by counties where they would be addressed under CEQA §15380. List 3 plants may be analyzed under CEQA §15380 if sufficient information is available to assess potential impacts to such plants. Factors such as regional rarity vs. statewide rarity should be considered in determining whether cumulative impacts to a List 4 plant are significant even if individual project impacts are not. List 3 and 4 plants are also included in the California Natural Diversity Database’s (CNDDB) Special Plants, Bryophytes, and Lichens List. [Refer to the current online published list available at: http://www.dfg.ca.gov/biogeodata.] Data on Lists 3 and 4 plants should be submitted to CNDDB. Such data aids in determining or revising priority ranking.

\(^6\) Refer to current online published lists available at: http://www.dfg.ca.gov/biogeodata.

\(^7\) http://www.dfg.ca.gov/biogeodata/vegcamp/pdfs/natcomlist.pdf. The rare natural communities are asterisked on this list.
developed by the U.S. Army Corps of Engineers to delineate jurisdictional wetlands\(^8\) or by the U.S. Fish and Wildlife Service to survey for the presence of special status plants\(^9\).

**BOTANICAL SURVEYS**

Conduct botanical surveys prior to the commencement of any activities that may modify vegetation, such as clearing, mowing, or ground-breaking activities. It is appropriate to conduct a botanical field survey when:

- Natural (or naturalized) vegetation occurs on the site, and it is unknown if special status plant species or natural communities occur on the site, and the project has the potential for direct or indirect effects on vegetation; or
- Special status plants or natural communities have historically been identified on the project site; or
- Special status plants or natural communities occur on sites with similar physical and biological properties as the project site.

**SURVEY OBJECTIVES**

Conduct field surveys in a manner which maximizes the likelihood of locating special status plant species or special status natural communities that may be present. Surveys should be floristic in nature, meaning that every plant taxon that occurs on site is identified to the taxonomic level necessary to determine rarity and listing status. “Focused surveys” that are limited to habitats known to support special status species or are restricted to lists of likely potential species are not considered floristic in nature and are not adequate to identify all plant taxa on site to the level necessary to determine rarity and listing status. Include a list of plants and natural communities detected on the site for each botanical survey conducted. More than one field visit may be necessary to adequately capture the floristic diversity of a site. An indication of the prevalence (estimated total numbers, percent cover, density, etc.) of the species and communities on the site is also useful to assess the significance of a particular population.

\(^8\) [http://www.wetlands.com/regs/tlpge02e.htm](http://www.wetlands.com/regs/tlpge02e.htm)

SURVEY PREPARATION

Before field surveys are conducted, compile relevant botanical information in the general project area to provide a regional context for the investigators. Consult the CNDDB\textsuperscript{10} and BIOS\textsuperscript{11} for known occurrences of special status plants and natural communities in the project area prior to field surveys. Generally, identify vegetation and habitat types potentially occurring in the project area based on biological and physical properties of the site and surrounding ecoregion,\textsuperscript{12} unless a larger assessment area is appropriate. Then, develop a list of special status plants with the potential to occur within these vegetation types. This list can serve as a tool for the investigators and facilitate the use of reference sites; however, special status plants on site might not be limited to those on the list. Field surveys and subsequent reporting should be comprehensive and floristic in nature and not restricted to or focused only on this list. Include in the survey report the list of potential special status species and natural communities, and the list of references used to compile the background botanical information for the site.

SURVEY EXTENT

Surveys should be comprehensive over the entire site, including areas that will be directly or indirectly impacted by the project. Adjoining properties should also be surveyed where direct or indirect project effects, such as those from fuel modification or herbicide application, could potentially extend offsite. Pre-project surveys restricted to known CNDDB rare plant locations may not identify all special status plants and communities present and do not provide a sufficient level of information to determine potential impacts.

FIELD SURVEY METHOD

Conduct surveys using \textit{systematic field techniques} in all habitats of the site to ensure thorough coverage of potential impact areas. The level of effort required per given area and habitat is dependent upon the vegetation and its overall diversity and structural complexity, which determines the distance at which plants can be identified. Conduct surveys by walking over the entire site to ensure thorough coverage, noting all plant taxa observed. The level of effort should be sufficient to provide comprehensive reporting. For example, one person-hour per eight acres per survey date is needed for a comprehensive

\textsuperscript{10} Available at http://www.dfg.ca.gov/biogeodata/cnddb

\textsuperscript{11} http://www.bios.dfg.ca.gov/

field survey in grassland with medium diversity and moderate terrain\textsuperscript{13},] with additional time allocated for species identification.

**TIMING AND NUMBER OF VISITS**

Conduct surveys in the field at the time of year when species are both evident and identifiable. Usually this is during flowering or fruiting. Space visits throughout the growing season to accurately determine what plants exist on site. Many times this may involve multiple visits to the same site (e.g. in early, mid, and late-season for flowering plants) to capture the floristic diversity at a level necessary to determine if special status plants are present.\textsuperscript{14} The timing and number of visits are determined by geographic location, the natural communities present, and the weather patterns of the year(s) in which the surveys are conducted.

**REFERENCE SITES**

When special status plants are known to occur in the type(s) of habitat present in the project area, observe reference sites (nearby accessible occurrences of the plants) to determine whether those species are identifiable at the time of the survey and to obtain a visual image of the target species, associated habitat, and associated natural community.

**USE OF EXISTING SURVEYS**

For some sites, floristic inventories or special status plant surveys may already exist. Additional surveys may be necessary for the following reasons:

- Surveys are not current;\textsuperscript{15} or
- Surveys were conducted in natural systems that commonly experience year to year fluctuations such as periods of drought or flooding (e.g. vernal pool habitats or riverine systems); or

\textsuperscript{13} Adapted from U.S. Fish and Wildlife Service kit fox survey guidelines available at www.fws.gov/sacramento/es/documents/kitfox_no_protocol.pdf

\textsuperscript{14} Fish and Wildlife Service Survey Guidelines available at http://www.fws.gov/sacramento/es/protocol.htm

\textsuperscript{15} Habitats, such as grasslands or desert plant communities that have annual and short-lived perennial plants as major floristic components may require yearly surveys to accurately document baseline conditions for purposes of impact assessment. In forested areas, however, surveys at intervals of five years may adequately represent current conditions. For forested areas, refer to “Guidelines for Conservation of Sensitive Plant Resources Within the Timber Harvest Review Process and During Timber Harvesting Operations”, [sic] available at https://r1.dfg.ca.gov/portal/Portals/12/THPBotanicalGuidelinesJuly2005.pdf
III. Responses to Comments

- Surveys are not comprehensive in nature; or fire history, land use, physical conditions of the site, or climatic conditions have changed since the last survey was conducted,\(^{16}\) or

- Surveys were conducted in natural systems where special status plants may not be observed if an annual above ground phase is not visible (e.g. flowers from a bulb); or

- Changes in vegetation or species distribution may have occurred since the last survey was conducted, due to habitat alteration, fluctuations in species abundance and/or seed bank dynamics.

NEGATIVE SURVEYS

Adverse conditions may prevent investigators from determining the presence of, or accurately identifying, some species in potential habitat of target species. Disease, drought, predation, or herbivory may preclude the presence or identification of target species in any given year. Discuss such conditions in the report.

The failure to locate a known special status plant occurrence during one field season does not constitute evidence that this plant occurrence no longer exists at this location, particularly if adverse conditions are present. For example, surveys over a number of years may be necessary if the species is an annual plant having a persistent, long-lived seed bank and is known not to germinate every year. Visits to the site in more than one year increase the likelihood of detection of a special status plant especially if conditions change. To further substantiate negative findings for a known occurrence, a visit to a nearby reference site may ensure that the timing of the survey was appropriate.

REPORTING AND DATA COLLECTION

Adequate information about special status plants and natural communities present in a project area will enable reviewing agencies and the public to effectively assess potential impacts to special status plants or natural communities\(^{17}\) and will guide the development of minimization and mitigation measures. The next section describes necessary information to assess impacts. For comprehensive, systematic surveys where no special status


species or natural communities were found, reporting and data collection responsibilities for investigators remain as described below, excluding specific occurrence information.

SPECIAL STATUS PLANT OR NATURAL COMMUNITY OBSERVATIONS

Record the following information for locations of each special status plant or natural community detected during a field survey of a project site.

- A detailed map (1:24,000 or larger) showing locations and boundaries of each special status species occurrence or natural community found as related to the proposed project. Mark occurrences and boundaries as accurately as possible. Locations documented by use of global positioning system (GPS) coordinates must include the datum18 in which they were collected;

- The site-specific characteristics of occurrences, such as associated species, habitat and microhabitat, structure of vegetation, topographic features, soil type, texture, and soil parent material. If the species is associated with a wetland, provide a description of the direction of flow and integrity of surface or subsurface hydrology and adjacent off-site hydrological influences as appropriate;

- The number of individuals in each special status plant population as counted (if population is small) or estimated (if population is large);

- If applicable, information about the percentage of individuals in each life stage such as seedlings vs. reproductive individuals;

- The number of individuals of the species per unit area, identifying areas of relatively high, medium and low density of the species over the project site; and

- Digital images of the target species and representative habitats to support information and descriptions.

FIELD SURVEY FORMS

When a special status plant or natural community is located, complete and submit to the CNDDDB a California Native Species (or Community) Field Survey Form19 or equivalent written report, accompanied by a copy of the relevant portion of a 7.5 minute topographic map with the occurrence mapped. Present locations documented by use of GPS

---

18 NAD83, NAD27 or WGS84
19 http://www.dfg.ca.gov/bioregions
coordinates in map and digital form. Data submitted in digital form must include the datum\textsuperscript{20} in which it was collected. If a potentially undescribed special status natural community is found on the site, document it with a Rapid Assessment or Relevé form\textsuperscript{21} and submit it with the CNDDB form.

**VOUCHER COLLECTION**

Voucher specimens provide verifiable documentation of species presence and identification as well as a public record of conditions. This information is vital to all conservation efforts. Collection of voucher specimens should be conducted in a manner that is consistent with conservation ethics, and is in accordance with applicable state and federal permit requirements (e.g. incidental take permit, scientific collection permit). Voucher collections of special status species (or suspected special status species) should be made only when such actions would not jeopardize the continued existence of the population or species.

Deposit voucher specimens with an indexed regional herbarium\textsuperscript{22} no later than 60 days after the collections have been made. Digital imagery can be used to supplement plant identification and document habitat. Record all relevant permittee names and permit numbers on specimen labels. A collecting permit is required prior to the collection of State-listed plant species.\textsuperscript{23}

**BOTANICAL SURVEY REPORTS**

Include reports of botanical field surveys containing the following information with project environmental documents:

- **Project and site description**
  - A description of the proposed project;
  - A detailed map of the project location and study area that identifies topographic and landscape features and includes a north arrow and bar scale; and,

\textsuperscript{20} NAD83, NAD27 or WGS84

\textsuperscript{21} http://www.dfg.ca.gov/biogeodata/vegcamp/veg_publications_protocols.asp


\textsuperscript{23} Refer to current online published lists available at: http://www.dfg.ca.gov/biogeodata.
III. Responses to Comments

- A written description of the biological setting, including vegetation\(^{24}\) and structure of the vegetation; geological and hydrological characteristics; and land use or management history.

- **Detailed description of survey methodology and results**
  - Dates of field surveys (indicating which areas were surveyed on which dates), name of field investigator(s), and total person-hours spent on field surveys;
  - A discussion of how the timing of the surveys affects the comprehensiveness of the survey;
  - A list of potential special status species or natural communities;
  - A description of the area surveyed relative to the project area;
  - References cited, persons contacted, and herbaria visited;
  - Description of reference site(s), if visited, and phenological development of special status plant(s);
  - A list of all taxa occurring on the project site. Identify plants to the taxonomic level necessary to determine whether or not they are a special status species;
  - Any use of existing surveys and a discussion of applicability to this project;
  - A discussion of the potential for a false negative survey;
  - Provide detailed data and maps for all special plants detected. Information specified above under the headings “Special Status Plant or Natural Community Observations,” and “Field Survey Forms,” should be provided for locations of each special status plant detected;
  - Copies of all California Native Species Field Survey Forms or Natural Community Field Survey Forms should be sent to the CNDDB and included in the environmental document as an Appendix. It is not necessary to submit entire environmental documents to the CNDDB; and,
  - The location of voucher specimens, if collected.

---

\(^{24}\) *A vegetation map that uses the National Vegetation Classification System (http://biology.usgs.gov/npsveg/nvcs.html), for example A Manual of California Vegetation, and highlights any special status natural communities. If another vegetation classification system is used, the report should reference the system, provide the reason for its use, and provide a crosswalk to the National Vegetation Classification System.*
III. Responses to Comments

- **Assessment of potential impacts**
  - A discussion of the significance of special status plant populations in the project area considering nearby populations and total species distribution;
  - A discussion of the significance of special status natural communities in the project area considering nearby occurrences and natural community distribution;
  - A discussion of direct, indirect, and cumulative impacts to the plants and natural communities;
  - A discussion of threats, including those from invasive species, to the plants and natural communities;
  - A discussion of the degree of impact, if any, of the proposed project on unoccupied, potential habitat of the species;
  - A discussion of the immediacy of potential impacts; and,
  - Recommended measures to avoid, minimize, or mitigate impacts.

**QUALIFICATIONS**

Botanical consultants should possess the following qualifications:

- Knowledge of plant taxonomy and natural community ecology;
- Familiarity with the plants of the area, including special status species;
- Familiarity with natural communities of the area, including special status natural communities;
- Experience conducting floristic field surveys or experience with floristic surveys conducted under the direction of an experienced surveyor;
- Familiarity with the appropriate state and federal statutes related to plants and plant collecting; and,
- Experience with analyzing impacts of development on native plant species and natural communities.

**SUGGESTED REFERENCES**


California Natural Diversity Database. Most recent version. Special vascular plants, bryophytes and lichens list. Updated quarterly. Available at www.dfg.ca.gov.


**Response to Comment No. 3-17**

The comment attaches CDFG’s *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFG 2009). The comment is addressed in Response to Comment No. 3-3. Please refer to Response to Comment No. 3-3.
Comment Letter No. 4

Dave Singleton
Program Analyst
Native American Heritage Commission
915 Capitol Mall, Rm. 364
Sacramento, CA 95814
www.nahc.ca.gov
ds_nahc@pacbell.net

Comment No. 4-1

The Native American Heritage Commission (NAHC), the State of California ‘Trustee Agency’ for the protection and preservation of Native American cultural resources. The NAHC wishes to comment on the above-referenced proposed Project.

This letter includes state and federal statutes relating to Native American historic properties of religious and cultural significance to American Indian tribes and interested Native American individuals as ‘consulting parties’ under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9.

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendments effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a ‘significant effect’ requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as ‘a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including... objects of historic or aesthetic significance.” In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the ‘area of potential effect (APE), and if so, to mitigate that effect. The NAHC Sacred Lands File (SLF) search resulted in; [sic] Native American cultural resources were not identified within 1/2 mile of the ‘area of potential effect (APE), based on the USGS coordinates of the project location. However, there are Native American cultural resources in close proximity to the APEs. The NAHC “Sacred Sites,’ as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254.10. The absence of evidence of archaeological items does not indicate that they do not exist at the subsurface and/or when groundbreaking activity occurs.
Response to Comment No. 4-1

As explained in the Draft EIR in Section IV.D.2, Cultural Resources—Archeological and Paleontological Resources, the Project Site is not known to contain any Native American cultural resources, which is consistent with the findings of the NAHC Sacred Lands File (SLF) search referenced in this comment. Nevertheless, also consistent with the comment, mitigation measures have been included in the Draft EIR to ensure that impacts to unknown archaeological resources would be mitigated in the unlikely event any resources are encountered during grading and excavation activities. Specifically, Mitigation Measure IV.D.2-4, set forth on page IV.D-40 of the Draft EIR, would ensure that any unanticipated impacts to buried human remains, including those of Native Americans, are mitigated to less-than-significant levels in accordance with State Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.8.

Comment No. 4-2

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the attached list of Native American contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). The NAHC recommends avoidance as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources.

Response to Comment No. 4-2

As explained in the Draft EIR in Section IV.D.2, Cultural Resources—Archaeological and Paleontological Resources, Government Code Section 65352.3 (Senate Bill [SB] 18) requires local governments to consult with California Native American tribes identified by the California Native American Heritage Commission (NAHC) prior to the adoption or amendment of a general plan or specific plan. The State Office of Planning and Research’s technical advice series recommends that agencies solicit the concerns of Native Americans and other interested persons and corporate entities, including, but not limited to, museums, historical commissions, associates and societies as part of the process of cultural resources inventory. In addition, California law protects Native American burials, skeletal remains, and associated grave goods regardless of the antiquity, and provides for the sensitive treatment and disposition of those remains. (See page IV.D-24 of the Draft EIR.) As the Project does not require an amendment to the City’s General Plan or propose adoption of or amendment to a specific plan, Senate Bill 18 is not applicable to the proposed Project.
The Draft EIR explains on page IV.D-39 that the Project Site is not known to contain any buried human remains outside of the designated interment sites within the developed portions of the Forest Lawn Memorial-Park. Pursuant to Government Code Section 65352.3, the Native American Heritage Commission was consulted during the NOP process and did not provide a response to the NOP consultation request. In addition, no recorded Native American burial sites were identified during the cultural resources records search or archival records search or field surveys. Nevertheless, as noted in the Draft EIR, grading and earthwork activities have an inherent potential to disturb previously undiscovered and unknown buried human remains, including those of Native Americans. Accordingly, Mitigation Measure IV.D.2-4 was included in the Draft EIR to ensure any unanticipated impacts to buried human remains, including those of Native Americans, are mitigated to levels that are less than significant in accordance with the prescribed statutes of State Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98. (See pages IV.D-39 and IV.D-40 of the Draft EIR.)

**Comment No. 4-3**

Furthermore we recommend, also, that you contact the California Historic Resources Information System (CHRIS) for pertinent archaeological data within or near the APE, at (916) 445-7000 for the nearest Information Center in order to learn what archaeological fixtures may have been recorded in the APE.

**Response to Comment No. 4-3**

As explained in the Draft EIR, Section IV.D.2, Cultural Resources—Archaeological and Paleontological Resources, page IV.D-31, a cultural resources records search was conducted by LSA Associates, Inc. at the South Central Coastal Information Center (SCCIC), located at California State University Fullerton. The SCCIC is one of the institutions under agreement with the State Office of Historic Preservation to integrate information on new resources and known resources into the California Historical Resources Information System (CHRIS) and supply information on resources and surveys to government, institutions, and the public. The records search included a review of all recorded historic archaeological sites and architectural resources, as well as all known cultural resource survey and excavation reports within a 0.5-mile radius of the Project area. In addition, LSA examined the National Register, the California Register, California Historical Landmarks, and California Points of Historical Interest. The Historic Properties Directory (2005) maintained by the State Office of Historic Preservation was also inspected for addresses within the Project area. Based on the findings of the cultural resources records search, the address of the Project Site is listed in the Historic Properties Directory; however, the site description refers to the original Forest Lawn Memorial-Park and Mortuary in Glendale, which opened in 1906. No other previously recorded cultural resources were identified within the Project Site or within 0.5 mile of the Project Site. (See page IV.D-31 of the Draft EIR.)
III. Responses to Comments

**Comment No. 4-4**

Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA (42 U.S.C 4321-43351) and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 et seq), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 et seq. and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 Secretary of the Interiors Standards for the Treatment of Historic Properties were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation.

**Response to Comment No. 4-4**

Please refer to Response to Comment No. 4-2. With respect to the National Environmental Policy Act and Section 106 of the National Historic Preservation Act, as noted in the Draft EIR, the Project will require a permit from the U.S. Army Corps of Engineers in accordance with regulations implementing Section 404 of the Clean Water Act. Therefore, compliance with Section 106 of the National Historic Preservation Act (as amended) is required in connection with the Army Corps of Engineers permit process.

**Comment No. 4-5**

Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archaeological resources during construction and mandate the processes to be followed in the event of an accidental discovery of any human remains in a project location other than a ‘dedicated cemetery’.

**Response to Comment No. 4-5**

As noted in Response to Comment No. 4-1, the Project Site is not known to contain any Native American cultural resources. (See Section IV.D.2, Cultural Resources—Archeological and Paleontological Resources, of the Draft EIR.) However, Mitigation Measure IV.D.2-4, set forth on page IV.D-40 of the Draft EIR, was included to ensure that any unanticipated impacts to buried human remains, including those of Native Americans, are mitigated to less-than-significant levels in accordance with State Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98.

**Comment No. 4-6**

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and...
their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

The response to this search for Native American cultural resources is conducted in the NAHC Sacred Lands Inventory, established by the California Legislature (CA Public Resources Code 5097.94(a) and is exempt from the CA Public Records Act (c.f. California Government Code 6254.10) although Native Americans on the attached contact list may wish to reveal the nature of identified cultural resources/historic properties. Confidentiality of “historic properties of religious and cultural significance” may also be protected under Section 304 of the NHA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility [sic] threatened by proposed project activity.

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

**Response to Comment No. 4-6**

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Please refer to Response to Comment No. 4-2 for additional information.
Comment Letter No. 5

Eric Bruins
Mountains Recreation and Conservation Authority
5810 Ramirez Canyon Road
Malibu, CA 90265
eric.bruins@mrca.ca.gov

Comment No. 5-1 (Correspondence regarding Draft EIR Public Review Period)

Email 1: Please see the attached extension request for the Forest Lawn DEIR public review period.

[Attachment to email] From Paul Edelman
Deputy Director, Natural Resources and Planning
Santa Monica Mountains Conservancy:

The Santa Monica Mountains Conservancy (Conservancy) is the principal State planning agency in the vicinity of the subject project. We did not receive notice of the circulation of the Draft Environmental Impact Report and were only just made aware of it today. As such, we request that the 45-day public review period be restarted to allow enough time for adequate review of the document. If you have any questions, I can be reached at (310) 589-3200 ext. 128.

Email 2: Please confirm that the review period will be extended.

Response from City: It’s being talked over right now by some other people; I should have a definite answer for you tomorrow.

Response 2 from City: The public comment period for the Forest Lawn Memorial Park–Hollywood Hills Master Plan has been extended by an additional 15 days to Wednesday, April 13, 2011. A revised Notice of Preparation with the new closing date will be distributed shortly.

Email 3: The Conservancy requests additional time to submit its comment letter on Forest Lawn. George Mihlsten has agreed to wait until the next board meeting on the 25th [of April].

Response to Comment No. 5-1

The Notice of Completion sent to the State Clearinghouse by the City of Los Angeles recommended that the Draft EIR be distributed to the Santa Monica Mountains
Conservancy as a reviewing agency. In response to the request by the Commentor and other interested parties, the original 45-day public comment period for the Draft EIR was extended by an additional 15 days, for a total of 60 days, which exceeds the 45-day public review period required by CEQA Guidelines Section 15105 when a Draft EIR is submitted to the State Clearinghouse for review by State agencies. The Commentor’s comments on the Draft EIR have been incorporated into the Final EIR and are addressed as Comment Letter No. 6.
Comment Letter No. 6

Antonio Gonzalez  
Chairperson  
Santa Monica Mountains Conservancy  
Ramirez Canyon Park  
5750 Ramirez Canyon Road  
Malibu, California 90265

Comment No. 6-1

The Santa Monica Mountains Conservancy (Conservancy) has reviewed the Draft Environmental Impact Report (DEIR) for the proposed Forest Lawn Memorial Park - Hollywood Hills Master Plan. The cemetery's location adjacent to Griffith Park provides a serene natural setting apt for such a use. As discussed further below, the Conservancy believes the alternatives analysis provides a useful framework for evaluating the project and its effect on natural resources. A modest reduction in the size of the expansion, such as provided by Alternative 4, would preserve much of the site's most valuable natural resources while still permitting Forest Lawn to continue its operations over the next half century. With impact avoidance as an overarching objective, the Conservancy offers the following specific comments on the proposed project and DEIR:

Response to Comment No. 6-1

The introductory comments are noted and have been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the environmental analysis in the Draft EIR are responded to below.

The alternatives analysis referenced in the comment is presented in Section VI of the Draft EIR. The Project would not result in any significant environmental impacts after implementation of mitigation measures. Thus, the alternatives analysis evaluates alternatives that would reduce overall development to examine whether the less-than-significant impacts associated with the Project could be further reduced. In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative, the comparative evaluation of the alternatives indicates that Alternative 4: Reduced Project with Preservation of Drainages D, D1, F, F1, and H would reduce more of the Project impacts than any of the other remaining alternatives and would be the Environmentally Superior Alternative. (See page VI-62 of the Draft EIR.)
III. Responses to Comments

Comment No. 6-2

On-site Riparian Habitat is a Unique Resource in Eastern Santa Monica Mountains

The on-site resources at Forest Lawn Memorial Park constitute some of the best riparian woodland habitat anywhere in the eastern Santa Monica Mountains. The Griffith Park-adjacent habitat is ecologically intact, high-functioning riparian habitat with nearly year-round surface flow. The subject property is situated on the cooler, wetter north-facing slopes of the Santa Monica Mountains, making it ecologically distinct from most of the remainder of the Griffith Park habitat block. Furthermore, Sennett Creek is not channelized for its entire length, all the way to its confluence with the Los Angeles River. No other Santa Monica Mountains creek is so directly ecologically connected to the Los Angeles River, making Sennett Creek and its tributaries high priorities for preservation.

As noted in the DEIR, riparian areas on the subject property serve dual functions. Their preservation is critical for both resident amphibian populations and mobile terrestrial mammals and reptiles that require access to lower reaches during the dry season. Sennett Creek is unique in the Griffith Park core habitat block in being able to consistently provide these ecosystem resources even in drought years. Therefore the quality of habitat connections between lower Sennett Creek and core upland habitat is one of the two most important considerations in assessing biological resource impacts of the proposed project.

Response to Comment No. 6-2

The comment discusses the importance of riparian habitat and Sennett Creek. As explained in detail in the General Biological Assessment, attached as Appendix C-1 to the Draft EIR, woodland communities in cismontane Southern California occur where increased soil moisture allows trees and tree canopies to develop. On south-facing exposures, this phenomenon occurs most frequently in close proximity to streams and in canyons shaded from solar penetration. On north-facing slopes and exposures, such as those found on the Project Site, woodlands tend to exhibit their highest diversity in association with streams. Due primarily to aspect (solar angle) and sometimes other various edaphic (soil) conditions, north-slope woodlands are generally dominated by coast live oak trees not dependent directly on stream-associated moisture. When mature, these woodlands establish a sustainable and complex microclimate. Numerous moisture-dependent shrubs, annual plant species and woodland-dependent wildlife thrive within the relatively moderate temperature regime as compared to adjacent scrub, grassland and chaparral communities. Deep forest soil and forest litter profiles can develop, fostered by microclimatic conditions and enhanced over time by the tree canopy and associated protective elements. The combination of the tree canopy, high amount of overall biomass, deep heterogeneous organic soil layers, prevalence of shade, soil moisture and downed wood, provides a unique and stable habitat for larger mammal, amphibian, avian and
invertebrate species. (See page 25 of the General Biological Assessment for Forest Lawn Memorial-Park, Hollywood Hills.)

As the Draft EIR explains on page IV.C-20, Sennett Creek originally was comprised of oak/sycamore dominated riparian woodland that stretched from the Los Angeles River upward into what is now called Royce’s Canyon in Griffith Park. Prior to 1940, Sennett Creek was one of many ecologically functional tributaries to the Los Angeles River. With the channelization of the Los Angeles River, Sennett Creek has been truncated. Portions of the creek have been affected by historic development of the Project Site as well; however, those previously affected sections have been largely restored and are now comprised of mixed willow riparian scrub intermixed with newly established sycamores, cottonwoods, and coast live oaks. (See Section IV.C, Biological Resources, of the Draft EIR, page IV.C-20.) Currently, Sennett Creek provides habitat and cover for riparian-dwelling and stream-dependent organisms, but it has no direct ecological connection with the Los Angeles River, as it once did. As such, it provides a water source and a movement area for animals like mule deer, long-tailed weasel (Mustela frenata), bobcat (Lynx rufus) and northern raccoon; however, its functions with regard to connectivity into greater Los Angeles River–associated habitats have been largely eliminated due to the current condition of the River and the extensive conversion of habitats throughout the San Fernando Valley. Moreover, regulatory status organisms that once might have used the river to access other tributary stream systems (such as anadromous fish species, California red-legged frog [Rana draytonii], and regulatory status small mammals like Los Angeles pocket mouse [Perognathus longimembris brevinasus] and perhaps kangaroo rats [Dipodomys spp.]) now are in decline or absent. Therefore, while terrestrial organisms now present in the area most likely do venture into Sennett Creek for water and for cover, they do not do so in a manner consistent with the actual role of wildlife corridors (i.e., Sennett Creek does not function as a wildlife corridor for terrestrial organisms because it is truncated at the concretized Los Angeles River Flood Control Channel and does not connect to high quality habitat areas). (See page IV.C-22 of the Draft EIR.) The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 6-3
Unique On-site Resources Necessitate Greater Impact Avoidance

As noted above, the Sennett Creek drainage, and to a lesser extent Drainage L (which is not a tributary of Sennett Creek), are unique resources within the Griffith Park core habitat block and critical to the capacity of the overall ecosystem. Given these considerations, impact avoidance must be the primary strategy in addressing impacts to biological resources. The Alternatives analysis provides a useful approach to evaluating reducing impacts through the avoidance of various drainages that are tributaries of Sennett Creek.
A slight reduction in project scale, such as represented by Alternative 4, would yield tremendous riparian benefits. The last five percent of the interment spaces is responsible for almost fifty percent of the riparian impacts. A small reduction in the context of the total expansion would produce substantial habitat preservation gains.

Lower Royce Canyon is the most important high-functioning riparian forest habitat in proximity to Griffith Park, with superior resource value than most similar habitats in the park. The Western Sycamore-Coast Live Oak woodland provides a lush, full canopy over Sennett Creek tributaries that would be impossible to replicate elsewhere. High-value habitats are more than the sum of their parts and can’t be accounted for in terms of acres and number of trees. Mitigation is inappropriate when resource loss can be avoided.

**Response to Comment No. 6-3**

Forest Lawn has successfully restored a large portion of Sennett Creek within the Project Site over the past approximately 12 years, and additional restoration is proposed in connection with the Project, including the restoration of an acre of riparian habitat adjacent to Sennett Creek. (See Mitigation Measure C-5 on page IV.C-47 of the Draft EIR.) Sennett Creek would be avoided by the proposed Project, with the exception of a small area of riparian habitat that would be affected by a proposed culvert crossing similar in design to existing road crossings, though the new crossing would be soft-bottomed to further reduce impacts.

The only other drainage on the Project Site that is directly tributary to the River is “Drainage L.” Drainage L is ephemeral in nature and only receives flows during storm events. All of “Drainage L” is heavily disturbed, and much of it flows on an old asphalt road. Drainage L conveys flows to the Los Angeles River through an existing 48-inch reinforced concrete pipe under Forest Lawn Drive. Drainage L is jurisdictionally disjunct and not continuous due to historic disturbance. Under the proposed Project, Drainage L would be enhanced, and Project mitigation includes the creation of an acre of riparian habitat along Drainage L. (See Mitigation Measure C-4 on pages IV.C-46 and IV.C-47 of the Draft EIR.)

As explained in the Draft EIR, the Project would not result any significant environmental impacts after implementation of mitigation measures. Thus, the alternatives analysis set forth in Section VI, Alternatives, of the Draft EIR, evaluates alternatives that would reduce overall development to examine whether the less-than-significant impacts associated with the Project could be further reduced. Specifically, given that most of the proposed Project development would occur within the undeveloped portions of the existing cemetery property in the Hollywood Hills, each of the alternatives evaluated in the Draft EIR include reductions in the amount of cemetery development proposed in the undeveloped portions of the Project Site based on the preservation of several of the on-site...
potentially jurisdictional drainages, particularly those with the highest biological and functional values. (See page VI-5 of the Draft EIR.)

As explained on page VI-40 in Section VI, Alternatives, of the Draft EIR, and as updated in Section II, Corrections and Additions to the Draft EIR, in this Final EIR, Alternative 4 would result in approximately 106 acres of usable acreage and approximately 93 acres of developable acreage, as compared to approximately 110 acres of usable acreage and approximately 94 acres of developable acreage under the proposed Project. Although impacts to biological resources under Alternative 4 would be reduced when compared to the proposed Project, Alternative 4 would provide a lesser amount of new cemetery development and approximately 5,100 fewer interment spaces as compared with the proposed Project. Accordingly, as explained on page VI-50 of the Draft EIR, under Alternative 4, the Project’s objectives, including to help meet the demands for interments for the region through 2050 and beyond, to provide various types of interment spaces and mortuary facilities to meet the needs of a broad array of ethnic and socio-economic groups, to provide space to accommodate multiple funeral services simultaneously, to provide sufficient ground property, and to provide areas for additional historical and inspirational works of art, would be met to a lesser degree than under the proposed Project. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 6-4

Habitat Connection to Los Angeles River Important to Revitalization

The interface between Sennett Creek and the Los Angeles River is the only direct riparian connection between the river and upland natural habitat areas. Forest Lawn has undertaken an extensive restoration of areas of Sennett Creek within the Forest Lawn property. This restoration is exemplary and has helped to re-establish and enhance the natural connection from upland areas to the Los Angeles River. In the context of river revitalization, its importance cannot be overstated. While the proposed project does not directly impact the Los Angeles River interface itself, it would make the upland habitat connections more tenuous by reducing the number of surface-running tributaries to Sennett Creek. The long term function of this habitat connection is directly dependent on the number of tributaries left intact. As noted in the DEIR, riparian corridors serve as primary wildlife movement corridors. Therefore Sennett Creek would function as the principal connection to future and existing habitat along a naturalized Los Angeles River.

While some degree of riparian impact is unavoidable given the nature of the project, a key objective must be to retain a connected, functional riparian ecosystem on-site. This is not just a function of the number of acres of jurisdictional impacts, but instead requires a coordinated approach to habitat preservation, creation, restoration, and enhancement that is integrated with the design of the proposed project. Ensuring the functionality of the onsite...
riparian ecosystem will avert cumulative impacts to Griffith Park resources dependent on habitat connectivity outside the park, particularly for more mobile animal species.

Response to Comment No. 6-4

As the comment notes, Forest Lawn has successfully restored a large portion of Sennett Creek within the Project Site over the past approximately 12 years. As the Draft EIR explains on page IV.C-20, Sennett Creek originally was comprised of oak/sycamore dominated riparian woodland that stretched from the Los Angeles River upward into what is now called Royce’s Canyon in Griffith Park. Prior to 1940, Sennett Creek was one of many ecologically functional tributaries to the Los Angeles River. With the channelization of the Los Angeles River, Sennett Creek has been truncated. Portions of the creek have been affected by historic development of the Project Site as well; however, those previously affected sections have been largely restored and are now comprised of mixed willow riparian scrub intermixed with newly established sycamores, cottonwoods, and coast live oaks. (See Section IV.C, Biological Resources, of the Draft EIR, page IV.C-20.) Currently, Sennett Creek provides habitat and cover for riparian-dwelling and stream-dependent organisms, but it has no direct ecological connection with the Los Angeles River, as it once did. As such, it provides a water source and a movement area for animals like mule deer, long-tailed weasel (Mustela frenata), bobcat (Lynx rufus) and northern raccoon; however, its functions with regard to connectivity into greater Los Angeles River–associated habitats have been largely eliminated due to the current condition of the River and the extensive conversion of habitats throughout the San Fernando Valley. Moreover, regulatory status organisms that once might have used the river to access other tributary stream systems (such as anadromous fish species, California red-legged frog [Rana draytonii], and regulatory status small mammals like Los Angeles pocket mouse [Perognathus longimembris brevinasus] and perhaps kangaroo rats [Dipodomys spp.]) now are in decline or absent. Therefore, while terrestrial organisms now present in the area most likely do venture into Sennett Creek for water and for cover, they do not do so in a manner consistent with the actual role of wildlife corridors (i.e., Sennett Creek does not function as a wildlife corridor for terrestrial organisms because it is truncated at the concretized Los Angeles River Flood Control Channel and does not connect to high quality habitat areas). (See page IV.C-22 of the Draft EIR.)

With respect to hydrological connectivity, as the Draft EIR explains in Section IV.G, Hydrology/Water Quality on page IV.G-3, Sennett Creek enters the Forest Lawn Memorial-Park property in the southern portion of the Project Site where stormwater flows from the north-facing slopes of the Santa Monica Mountains converge into a more distinct channel and flow onto the Project Site. Sennett Creek flows through the Project Site to an adjacent property, owned by Junior Achievement of Southern California, Inc., where waters from Sennett Creek then enter three corrugated metal pipes, each approximately 60 inches in diameter, located underneath Forest Lawn Drive. On the north side of the public right-of-way, the waters pass through a concrete outfall structure located on what appears to be
Los Angeles Department of Water and Power property, to an outlet into the concrete channel of the Los Angeles River.

The current condition of the River at its confluence with Sennett Creek is degraded and human-modified. The Los Angeles River is entirely concrete-lined at the confluence, and has been deepened substantially below the grade at which it once naturally joined with Sennett Creek. The Los Angeles River Flood Control Channel has no vegetation or canopy at its confluence with Sennett Creek. As noted above, Sennett Creek flows are now conveyed under Forest Lawn Drive through three large, circular pipes and into an outfall structure, which appears to be entirely concrete, but the bottom of the structure has sand and cobbles in it. Sediment has accumulated and appears to provide a substrate supporting vegetation. A mix of invasive, non-native trees and native riparian vegetation is now present in the outfall structure, including Peruvian pepper trees (*Schinus molle*), black cottonwood (*Populus trichocarpa*), willow (*Salix* sp.), mulefat (*Baccharis salicifolia*), California grape (*Vitis californica*), and poison oak (*Toxicodendron diversilobum*). Flows drop down into the Los Angeles River Flood Control Channel from the inclined outfall at an approximate height of 25 feet above the floor of the channel. Mammals, most reptiles and amphibians cannot presently move into or out of the outfall structure or out of the channel, although some animals may be washed into the channel from time to time during higher intensity storms. Additionally, when the River is in flood stage its flows are likely high enough to reach to the outfall. Birds can fly freely from the channel bottom, through or over the outfall, across Forest Lawn Drive, and into Sennett Creek, but no habitat is present in the channel at this location to support most native animal species. Wading birds, waterfowl, and birds associated with open areas (red-tailed hawks, turkey vultures, various ducks, etc.) can be found foraging in the channel.

As explained in the Draft EIR, the proposed Project would impact approximately 12 acres of riparian-associated habitats (e.g., western sycamore/coast live oak, western sycamore/willow riparian forest, southern willow scrub, mulefat scrub, southern willow scrub/mulefat scrub, and disturbed mulefat scrub) on the Project Site. The Project would avoid approximately 13.89 acres out of the 25.89 acres of riparian habitat on the Project Site. Sennett Creek would be avoided by the proposed Project, with the exception of a small area of riparian habitat that would be affected by a proposed culvert crossing similar in design to existing road crossings, though the new crossing would be soft-bottomed to further reduce impacts. Most of the Sennett Creek tributaries which would be affected by Project development do not contain surface water during summer months, although the lower reaches of Sennett Creek appear to support surface water each year. During summer months when water is scarce and found mostly in lower elevation areas, the preservation of Sennett Creek should provide adequate water resources. Though approximately 12 acres of riparian-associated habitat would be removed and animal movement through several drainages on the Project Site would be impeded with implementation of the proposed Project, the proposed Project would not create a substantial barrier to animal movement given the small area of the larger habitat complex.
that would be affected. Furthermore, the existing impaired connectivity to the Los Angeles River via Sennett Creek and its tributaries, which provide habitat and cover but no longer have direct ecological connection with the Los Angeles River, would remain in place. Implementation of the proposed mitigation measures described in Section IV.C of the Draft EIR, including Mitigation Measures C-1 through C-6, which provide for the conservation, restoration, and creation of natural habitat areas on the Project Site, and a five-year habitat improvement and monitoring program for the conserved areas on the Project Site, and Mitigation Measures C-10 through C-16, and C-18 through C-19, would be expected to further reduce impacts, resulting in an overall impact with respect to animal movement that would not be significant. (See page IV.C-40 of the Draft EIR.) The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 6-5**

**Habitat Connectivity Through Cahuenga Pass is a Critical Issue for Griffith Park Ecology**

The DEIR asserts that Griffith Park is a biologically isolated island of remnant natural habitat:

> A review of current aerial photography and knowledge of this area generally suggests that this "island" of relatively natural habitat is, in itself, largely isolated. It has no connective habitat to natural areas west of the Hollywood Freeway. No discernable corridors or critical pathways for terrestrial wildlife have been identified.

The Conservancy disagrees with the notion that Griffith Park is disconnected from natural areas to the west. The Conservancy and Mountains Recreation and Conservation Authority (MRCA) own both large habitat blocks and smaller connective parcels designed to facilitate wildlife movement throughout the eastern Santa Monica Mountains generally and across the Cahuenga Pass specifically. Where else could the occasional mountain lion sighted in Griffith Park come from?

Most assuredly, Cahuenga Pass is a partial barrier to some terrestrial wildlife movement—one that must be remedied. That issue is beyond the scope of this project but the project can provide mitigation opportunities as addressed in this letter. Studies of movement patterns through this corridor are ongoing to fill this information void; however in the interim it must be assumed that biological exchange occurs regularly, even under existing constrained conditions. If anything, the tenuousness of the connection would warrant greater levels of mitigation rather than less. The remaining wildlife passages through Cahuenga Pass are the target of multiple public and private conservation efforts. The recent acquisition of Cahuenga Peak furthers these aims.
III. Responses to Comments

We request that Figure IV.C-3 be revised to more fully reflect all public protected open space in the project vicinity. Terrestrial wildlife movement does not require literally contiguous parcels of habitat, but instead habitat blocks of all sizes with some degree of permeability in between. The FEIR should revise this figure to reflect all public protected open space in the map view. Currently the figure does not even include contiguous habitat in the vicinity of Lake Hollywood. Conservancy staff will provide parkland GIS layers if requested.

Response to Comment No. 6-5

The comment suggests that the Draft EIR incorrectly refers to Griffith Park as an “island” that is disconnected from natural areas to the west. To clarify, the Draft EIR describes an “island” of natural open space consisting of approximately 3,700 acres south of State Highway 134, east of Barham Boulevard, west of Interstate 5, and north of the southern boundary of Griffith Park. As the Draft EIR explains, in addition to Griffith Park natural areas, this area includes undeveloped areas of the Project Site, and other privately owned properties in the Cahuenga Peak/Mt. Lee area and is surrounded by the developed urban area. (See Section IV.C, Biological Resources, of the Draft EIR, page IV.C-20.) The Draft EIR notes that this area of natural habitat is largely isolated, with no connective habitat to natural areas west of the Hollywood Freeway, and that no discernable corridors or critical pathways for terrestrial wildlife have been identified. (See page IV.C-39 of the Draft EIR.) The Draft EIR does not state that wildlife does not pass out of this area. The Draft EIR describes the south and north slopes of the Hollywood Hills and notes that habitat generalists such as mule deer and coyote move freely between the various community types. (See Draft EIR page IV.C-20.) Over the course of years of investigation in Southern California, it is generally recognized that mountain lions, like coyotes and other meso-predators, have become habituated to urban environments and fringe areas and can in some instances be considered habitat generalists (species common to multiple habitat types and/or urban environments). In addition, the Draft EIR notes that a number of common, urban-adapted species, such as Virginia opossum, northern raccoon, mule deer, and coyote, can be found outside of the natural habitat block within the developed/cemetery portion of the Project Site, which contains low levels of evening light, closes at night, and provides urban-tolerant species with foraging area. (See page IV.C-19 of the Draft EIR.)

The issue of connectivity between the Griffith Park habitat block and the Santa Monica Mountains to the west was summarized in the Draft EIR (See, Section IV.C.2.b(6), Wildlife Movement, page IV.C-20) and discussed in detail in the General Biological Assessment, attached as Appendix C-1 to the Draft EIR. The analysis acknowledges that the Griffith Park habitat block is relatively porous for a number of organisms, including most resident bird species and mobile terrestrial organisms. The assertion by the commentor that animals move across the Cahuenga Pass between Griffith Park and the eastern Santa Monica Mountains is largely correct for habitat generalists and mobile organisms, as noted
in the Draft EIR and the General Biological Assessment. The proposed Project would not affect the movement of such organisms across parcels, open land, or connecting bridges in and around the Cahuenga Pass. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Figure IV.C-3 has been updated in response to the comment and based on additional information provided by the Commentor. Please refer to Section II, Corrections and Additions of this Final EIR.

**Comment No. 6-6**

**Habitat Area to be Lost is Valuable and Should be Minimized**

The DEIR calculates the habitat loss to occur under the proposed project as a percentage of the greater Griffith Park core habitat area to conclude that a 1.9 percent loss is less than significant. Setting aside the issue of significance, the Conservancy believes that habitat loss in the context of an already stressed ecosystem should be minimized. In the Hollywood Hills and Griffith Park ecosystems, the Conservancy's view is that the loss of more than five acres of any habitat type should be avoided.

Furthermore, the habitat loss associated with the proposed project would occur in vegetation communities that comprise the ecologically important north slope habitat in the Griffith Park core habitat block. The FEIR should identify what percentage of riparian woodland and other sensitive communities in the Griffith Park core habitat area would be impacted under the proposed project and each alternative.

Second only to connectivity, the size of the core habitat area is an important issue facing the Griffith Park habitat block. As the 2007 fire demonstrated, a single stochastic disturbance can affect the entire area. Habitat size is the primary determinant of an ecosystem’s resiliency against this kind of event. Unaffected areas provide critical source flora and fauna for recolonization after natural or manmade disturbances.

As proposed, riparian mitigation may occur outside the Santa Monica Mountains in the upper Los Angeles River watershed. Thus, this off-site mitigation may not address the reduction in habitat area within the Griffith Park core habitat area. We believe that the mitigation should be focused on this core habitat area. To compensate for the diminution of the Griffith Park core habitat area, additional mitigation should occur within or in close proximity to the habitat block. For example, this mitigation could include permanent preservation of private land within the Griffith Park core habitat area or Cahuenga Pass wildlife corridor. The FEIR must include a voluntary mitigation measure to provide a fund for the MRCA to acquire approximately 20 acres in either the movement corridor or
unprotected riparian woodland habitat within the block. A rough estimate for the value of such a fund can be computed using the cost of the recent Cahuenga Peak acquisition, which was $87,000 per acre.

To offset the aforementioned habitat loss, the voluntary mitigation measure must contribute $2 million to the Mountains Recreation and Conservation Authority (MRCA) for acquisition of parcels within the Griffith Park core habitat area and/or Cahuenga Pass wildlife movement corridor and related expenses. Expenditures from this fund would be geographically limited to within the Santa Monica Mountains east of a north-south axis formed by Runyon Canyon Park, Mulholland Drive, and Multiview Drive. This amount is commensurate to the impact from Alternative 4, the Conservancy's preferred alternative. Any increase in project size beyond the 133 acres of Alternative 4 shall be further offset by additional habitat acquisition funding at a rate of $80,000 per acre. Should the project be reduced in size below that contemplated by Alternative 4, a proportional reduction in off-site acquisition funding may be appropriate. The voluntary mitigation measure must require that an initial $600,000 be paid to the MRCA prior to issuance of the grading permit, with the balance of the fund transferred within 18 months of that date.

Key parcels in the corridor are owned by the Department of Water and Power (DWP). Causing for the permanent preservation of these parcels by the applicant would contribute toward offsetting the habitat loss associated with the proposed project and therefore constitutes an adequate alternative to transferring the balance of the fund. However, the initial $600,000 payment is intended for acquisitions on the west side of the Cahuenga Pass and must be transferred regardless of the status of the DWP property. If desired by the applicant, the MRCA would allow the applicant to secure MRCA-approved properties on the Authority's behalf in lieu of the full monetary contribution. If the majority of the DWP property between Lake Hollywood and Cahuenga Pass is not adequately protected to MRCA standards within 18 months of the issuance of the grading permit associated with the subject project, the remaining $1.4 million shall be transferred to the MRCA.

**Response to Comment No. 6-6**

As the comment notes, and as explained in the Draft EIR, the functional natural habitat within the Project Site is at the edge of the Hollywood Hills/Griffith Park habitat complex, and the 70.42 acres of natural areas on the Project Site that would be impacted by the proposed Project comprise just 1.9 percent of the approximate 3,700-acre area of remnant natural habitat in the easternmost Santa Monica Mountains. Potential Project impacts to sensitive habitat were also evaluated with respect to individual vegetation communities in Section IV.C, Biological Resources, of the Draft EIR and in the General Biological Assessment, attached as Appendix C-1 to the Draft EIR. The vegetation and plant communities existing on the Project Site are described in detail on pages IV.C-13 to IV.C-18 of the Draft EIR, and potential impacts to each vegetation community associated with the proposed Project are described on pages IV.C-27 and IV.C-29 of the Draft EIR.
addition, Table IV.C-1, Vegetation Communities on the Project Site, on page IV.C-28 of the Draft EIR, lists each natural vegetation community on the Project Site, its acreage, the acreage impacted by the Project, and regulatory status designation, if any. Figure IV.C-4 on page IV.C-30 of the Draft EIR depicts the vegetation communities that would be affected by the proposed Project. As the Draft EIR explains, of the approximately 120 acres of native vegetation communities present on the Project Site, approximately 18.02 acres of vegetation communities locally designated as a Highest Inventory Community by the City of Los Angeles CEQA Thresholds Guide and/or identified as a CDFG Special Community (or the functional equivalent thereof) would be permanently impacted by the implementation of the proposed Project, including approximately 9.27 acres of western sycamore/coast live oak, approximately 7.64 acres of coast live oak woodland, approximately 0.62 acre of California walnut woodland, approximately 0.39 acre of southern willow scrub/mulefat scrub, approximately 0.05 acre of southern willow scrub, and approximately 0.05 acre of western sycamore/willow riparian forest. Implementation of the proposed mitigation program described in the Draft EIR, including Mitigation Measures C-1 through C-6, Mitigation Measure C-8, and Mitigation Measures C-15 through C-17, would reduce the impacts to these regulatory status vegetation communities to a less-than-significant level. (See page IV.C-29 of the Draft EIR.) The Draft EIR also describes the Project impacts to vegetation communities that are not considered regulatory status, which would be less than significant. (See page IV.C-29 of the Draft EIR.)

Off-site analysis and vegetation mapping was not conducted throughout the approximate 3,700-acre habitat block and is not available for reference. The Project Site was mapped digitally and plant communities quantified as discussed above. Performing off-site analyses on lands not owned by the Applicant is not within the scope of the analysis for the Project under CEQA.

As explained in the Draft EIR and above, the proposed Project would impact approximately 70.42 acres of natural area, or approximately 1.9 percent of the greater habitat block. A substantial amount (approximately half) of that impacted acreage would be replaced on-site pursuant to the mitigation program described in the Draft EIR. Additional land, primarily riparian drainages, would be restored within the Los Angeles River watershed pursuant to Mitigation Measure C-8 and the Applicant’s agreement with the Mountains Recreation and Conservation Authority. As the Draft EIR concludes, with implementation of the mitigation measures described in the Draft EIR, potential impacts to biological resources would be less than significant. Accordingly, the voluntary mitigation measure suggested by the commentor is not necessary to reduce Project impacts to a less-than-significant level. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment No. 6-7

On-Site Resources Must be Better Protected

The Conservancy asserts that minimizing on-site impacts to sensitive communities is the correct approach. Remaining resources on-site must be afforded the highest possible form of protection. Preservation of remaining habitat, revegetated slopes, and riparian corridors on the subject property must be a condition of approval to ensure enforceable protection in perpetuity. In addition, the adjacent undeveloped property owned by Forest Lawn to the west of the project area must be permanently protected as part of the subject approval. The Conservancy understands that the DWP easement is preexisting and would be superior to any preservation program. The Conservancy would support any fee simple transfer of conserved land to the City of Los Angeles Department of Recreation and Parks with an overlying conservation easement in favor of the MRCA.

Response to Comment No. 6-7

As required pursuant to Mitigation Measures C-1 through C-5, set forth on pages IV.C-44 through IV.C-47 of Section IV.C, Biological Resources, of the Draft EIR, Forest Lawn shall record a covenant and agreement not to develop or bury within the on-site mitigation areas in accordance with the final design plan for the Project approved by the applicable agencies. The timing of submittal and recordation of the covenant and agreement shall be in accordance with Project implementation and subject to the approval of the Department of City Planning. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 6-8

Fencing Must be Permeable to Mammals

The DEIR notes that existing fencing on the property’s perimeter is somewhat permeable to wildlife. However, the fencing’s permeability is currently left to chance and the project contains no assurances that future extensions or repairs will also be permeable to wildlife. To achieve a less-than-significant impact to wildlife movement, a voluntary mitigation measure should explicitly state that all new or renovated fencing greater than 1,500 feet from Forest Lawn Drive will be passable to wildlife such that mammals can access the lower reaches of Sennett Creek during the dry months.

Response to Comment No. 6-8

As the Draft EIR explains on page IV.C-22 of Section IV.C, Biological Resources, the Project Site is currently fenced along Forest Lawn Drive (i.e., the north property boundary), along the eastern boundary with Griffith Park, and along a portion of the
III. Responses to Comments

The fence along the southern boundary of the Project Site extends from the southeast corner of the Project Site to the area near Drainages E and F in the central portion of the Project Site. Other areas of the Project Site adjacent to undeveloped areas are otherwise maintained in their natural state. Where fencing is placed along the property line, it tends to be porous in terms of wildlife movement, and birds, small mammals, snakes, lizards, and invertebrates generally would not experience any barriers as a result of the existing fencing. The impact analysis on pages IV.C-40 and IV.C-41 of the Draft EIR explains that the Project Site’s existing fencing is expected to remain, and additional fencing or replacement fencing may be installed over time as needed for safety purposes. New fencing, if added, would be placed within the designated disturbance footprint of the Project. Consistent with the existing fencing, any additional fencing along the property line would have little to no effect on birds, small mammals, snakes, lizards, amphibians, and invertebrates, as they generally do not experience any barriers as a result of the existing fencing. Larger mammals likely use avenues of opportunity to circumvent fencing by jumping or climbing, searching for gaps in drainages or low spots, or using tree limbs or tree canopies that extend over the fence. Thus, the existing fencing and any additional fencing is unlikely to substantially inhibit animal movement, and the Draft EIR concludes that potential impacts associated with fencing would not be significant.

As noted in Section IV.H, Land Use Planning, of the Draft EIR, one of the performance standards set forth for cemeteries as a public benefit use under Section 14.00 of the Los Angeles Municipal Code is that there is a solid, decorative, masonry or wrought iron wall or fence at least 8 feet in height, or the maximum height permitted by the zone, whichever is less, that encircles the periphery of the property and does not extend into the required front yard setback. (See pages IV.H.9 and IV.H-10 of the Draft EIR and Section 14.00 A.1(b) of the Los Angeles Municipal Code.) In analyzing the Project’s conformance with this standard, the Draft EIR explains on page IV.H-27 that a wrought iron fence is provided along the northerly edge of the property adjacent to Forest Lawn Drive. Additional areas of the Project Site adjacent to undeveloped areas include a chain link fence along the property line, and other areas adjacent to undeveloped open space areas such as Griffith Park are otherwise maintained in their natural state. As the Draft EIR notes, the 444-acre Project Site includes areas of varying topography and extensive vegetation, which serve to further buffer the Project Site. The Draft EIR concludes that the Project is consistent with the purposes of the performance standard because the Project is located within the periphery of the existing Memorial-Park property and will thus be protected by the existing fences and natural barriers which also protect adjacent uses. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment No. 6-9
Lighting Impacts are Adequately Addressed

The potential impact from both direct and ambient lighting is an important consideration for biological resources. The Conservancy believes that the standard of preventing artificial illumination of natural areas, as identified in the DEIR, is sufficient. Sennett Creek and its tributaries must be included in the definition of natural areas for this purpose.

Response to Comment No. 6-9

Pursuant to Mitigation Measure C-19, set forth on page IV.C-53 of the Draft EIR, all lighting adjacent to natural areas shall be of low luminescence, directed downward or toward structures, and shielded to the extent necessary to prevent artificial illumination of natural areas and protect nocturnal biological resources, as determined appropriate by a qualified biologist. Sennett Creek and tributaries preserved under the proposed Project would be considered natural areas addressed by the mitigation measure. The comment is noted and has been forwarded to the decision-makers for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 6-10
Impact of Brush Clearance Should be Identified

The DEIR references the fact that some natural areas will be brushed and asserts that this impact will be less than significant. However, the location and extent of brush clearance is not clearly identified therefore the impact cannot be effectively evaluated. The FEIR should define what brush clearing for aesthetic purposes means and show the extent of its reach into natural areas. Additionally, the FEIR should disclose whether any of the brush clearance will occur on neighboring parcels or in Griffith Park. Brush clearance areas must be evaluated by quantifying the impact by affected habitat type.

Response to Comment No. 6-10

As provided in Mitigation Measure C-2, set forth on page IV.C-46 of the Draft EIR, Forest Lawn shall create 23 acres of graded slopes on the Project Site in substantial conformance with Figure IV.C-5 on page IV.C-45, On-Site Mitigation Areas, and plant this area with native plant communities such as woodland, chaparral, and scrub in accordance with an upland habitat plan prepared by a qualified biologist/restoration ecologist. This area may include appropriate buffers of native vegetation adjacent to developed cemetery property that may be maintained for fire safety and aesthetic purposes. Natural areas that are adjacent to developed areas would be clearly identified through open fencing and/or signage and these areas would not be subject to vegetation management or clearing by Forest Lawn. The only areas of Griffith Park that would be affected would be the three
off-site basin areas, and those habitat types and acreages are identified in the Draft EIR (Section IV.C, page 42). The perimeters of those three basins would be managed for weed control and fire suppression only within the approved development footprint and not in areas that were not anticipated for construction of each basin.

Comment No. 6-11
Cumulative Impacts Should be Further Examined

The DEIR asserts that because the project’s impacts are mitigated to a level of insignificance and any other potential project would likewise be mitigated to a level of insignificance, there would be no potential for cumulative impacts. However, the distinction between a cumulative impact and a direct impact is that a cumulative impact occurs when multiple direct impacts that would otherwise be less than significant are in fact significant when considered together. A project with reduced impacts due to off-site mitigation, as is the case with the proposed project, could very well contribute to cumulative impacts in the vicinity of the project despite that mitigation.

The FEIR should further evaluate the cumulative impacts of the proposed project in the context of an ever-shrinking core habitat area and ever-diminishing connectivity to the rest of the Santa Monica Mountains. It is very possible that additional mitigation may be required to address specific potential cumulative impacts to wildlife movement, habitat area, and ecosystem resilience. The habitat acquisition fund proposed above would address this potential for cumulative impacts.

Response to Comment No. 6-11

Pursuant to the CEQA Guidelines, “cumulative impacts” refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. (CEQA Guidelines, Section 15355.) An EIR must discuss cumulative impacts of a project when the project’s incremental effect is cumulatively considerable (i.e., significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects). (CEQA Guidelines Sections 15130 and 15065(a)(3).) “An EIR should not discuss impacts which do not result in part from the project evaluated in the EIR.” (CEQA Guidelines Section 15130(a)(1).) Pursuant to the CEQA Guidelines, an EIR may determine that a project’s contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact. (CEQA Guidelines Section 15130(3).) The discussion of cumulative impacts “need not provide as great detail as is provided for the effects attributable to the project alone...[and] should be guided by the standards of practicality and reasonableness.” (CEQA Guidelines, Section 15130.)
As explained in the cumulative impacts discussion in the Biological Resources Section of the Draft EIR, although Griffith Park and other undeveloped lands are directly south, east and west of the Project Site, the other surrounding areas are highly urbanized and would be rarely used by wildlife other than those adapted to urban environments. The functional natural habitat within the Project Site is at the edge of the Hollywood Hills/Griffith Park habitat complex, and the 70.42 acres of natural areas on the Project Site that would be impacted by the proposed Project comprise just 1.9 percent of the approximate 3,700-acre area of remnant natural habitat in the easternmost Santa Monica Mountains. This relatively small area that would be affected by the proposed Project (in comparison to the approximately 3,700-acre habitat block) would support a proportionally small amount of wildlife movement. Thus, barriers or impediments to movement in this small area would not preclude or eliminate animal movement on the north slope of the Santa Monica Mountains/Hollywood Hills, and impacts associated with wildlife movement would be less than significant. (See pages IV.C-39 and IV.C-40 of the Draft EIR.) As discussed in the Draft EIR, the proposed Project would not have a significant impact on biological resources (including vegetation communities, regulatory status animal or plant species, protected trees, or jurisdictional features) with implementation of the proposed mitigation program. Thus, the Project’s incremental effects are not cumulatively considerable, and therefore, the Project’s potential cumulative impacts with respect to biological resources would be less than significant. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 6-12**

**Alternative 4 Represents Best Balance of Resource Protection and Cemetery Use**

The Conservancy supports the identified environmentally superior alternative: Alternative 4. This alternative strikes the best balance between expanding the cemetery and preserving the highest-value riparian resources. As outlined above, the on-site riparian resources are critical to the overall health of the Griffith Park core habitat area, warranting a sharp focus on impact avoidance. Alternative 4 successfully preserves multiple Sennett Creek tributaries and their associated riparian woodland habitat without unduly reducing the number of interment sites possible on the subject property. The alternative provides for 188,487 interment sites, instead of the proposed 199,614, while impacting 3.79 fewer acres of jurisdictional streambed than the proposed project. Only Alternative 5 would avoid further riparian impacts, but at the cost of a substantial reduction in interment sites.

Although Alternative 4 still results in some riparian resource loss, the extent of this loss is much reduced in comparison to the proposed project and would spare the most sensitive on-site resources. The MRCA has entered into an In-Lieu Fee Agreement with Forest Lawn in accordance with mitigation measure C-8 providing for the replacement of lost riparian resources through creation, restoration, and enhancement activities off-site, pending approval from the U.S. Army Corps of Engineers and California Department of Fish and
Game. Mitigation will be determined based on a required mitigation ratio and what jurisdictional acreage is ultimately impacted by the proposed project.

**Response to Comment No. 6-12**

The Commentor's support for Alternative 4 is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. As explained in the Draft EIR, Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project must identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. As set forth on page VI-62 of the Draft EIR, Alternative 4 (Reduced Project with Preservation of Drainages D, D1, F, F1, and H) would be the Environmentally Superior Alternative. Although Alternative 4 would reduce impacts as compared with the proposed Project, Alternative 4 would meet several of the Project objectives to a lesser degree than the proposed Project. The commenter is referred to Section II, Corrections and Additions to the Draft EIR, in this Final EIR, for an updated description of Alternative 4.

As the comment notes, Mitigation Measure C-8, set forth on pages IV.C-48 and IV.C-49 of the Draft EIR, requires Forest Lawn to retain a qualified biologist/restoration ecologist to identify degraded on-site and off-site streambeds and/or “waters of the U.S” (i.e., CDFG, Regional Water Quality Control Board and/or Corps jurisdictional areas) and identify opportunities for creation, restoration and/or enhancement. Areas for consideration may include areas on the Project Site or other properties located within the Los Angeles River watershed, including headwaters of the Los Angeles River. The acreage to be created, restored or enhanced shall be determined on a mitigation-to-impact ratio (e.g., 1:1 or 2:1) and based on functional assessments (CRAM or similar methodology) of both impacted areas and proposed mitigation areas. Implementation of the mitigation measure may also be satisfied by payment of a mitigation fee to a third party responsible for mitigation implementation and long-term maintenance for off-site mitigation, subject to the approval of CDFG, the Corps, and the Regional Water Quality Control Board, as applicable. Accordingly, as the comment notes, Forest Lawn and the Mountains Recreation and Conservation Authority, a joint powers agency of the Santa Monica Mountains Conservancy, have entered into an agreement for the provision of off-site mitigation (creation/restoration of areas subject to CDFG and Army Corps jurisdiction) in the Los Angeles River watershed in connection with the Project by the Mountains Recreation and Conservation Authority.

**Comment No. 6-13**

The State Clearinghouse failed to notify the Conservancy of the release of this DEIR, though we understand that the City and Forest Lawn did in fact correctly request that the State Clearinghouse notify the Conservancy. In order to avoid lack of notice in the future with regard to this project, please send all future notices and other project documents to the...
letterhead address. If you have any questions, please contact Paul Edelman of our staff at (310) 589-3200 ext. 128.

Response to Comment No. 6-13

As noted by the comment, the Notice of Completion sent to the State Clearinghouse by the City of Los Angeles recommended that the Draft EIR be distributed to the Santa Monica Mountains Conservancy as a reviewing agency. All future public notices to the Santa Monica Mountains Conservancy regarding the Project will be sent as directed by the comment.
Comment Letter No. 7

Anthony E. Vyinih
Assistant Deputy Director
Land Development Division
County of Los Angeles
Department of Public Works
900 S. Fremont Ave.
Alhambra, CA  91803-1331
http://dpw.lacounty.gov

Comment No. 7-1

Thank you for the opportunity to review the Draft Environmental Impact Report for the Forest Lawn Memorial Park–Hollywood Hills Master Plan project. The project is to provide for additional interment spaces and related facilities in order to respond to the existing and increasing demand for interment and funeral resources in the greater Los Angeles area, specifically, the demand within the market region for the Forest Lawn–Hollywood Hills property. The project is located at the northeastern base of the Santa Monica Mountains in the City of Los Angeles at the existing Forest Lawn Memorial Park–Hollywood Hills property located at 6300 Forest Lawn Drive.

The following comments are for your consideration and relate to the environmental document only.

Response to Comment No. 7-1

The introductory comments are noted and have been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the environmental analysis in the Draft EIR are responded to below.

Comment No. 7-2

Hazards—Geotechnical/Geology/Soils

The seismic design criteria shown on page 9 of the April 28, 2008, soils report should be updated as necessary.

If you have any questions regarding the geotechnical/geology/soils comment, please contact Mr. Jeremy Wan at (626) 458-3873 or jwan@dpw.lacounty.gov.
Response to Comment No. 7-2

The comment suggests that the seismic design criteria shown on page 9 of the soils report for the Project should be updated as necessary. The Geologic and Geotechnical Engineering Review for the Project, which is attached as Appendix E to the Draft EIR, references the 2006 International Building Code seismic design criteria. As the Draft EIR explains, the State of California adopted the 2007 California Building Code, which is based on the 2006 International Building Code. (See Section IV.E, Geology/Soils, page IV.E-5, of the Draft EIR.) The Geotechnical Engineer has indicated that although the International Building Code has been updated since the environmental analysis for the Project was prepared, the seismic design criteria have not changed in the 2009 International Building Code, and the conclusions set forth in the environmental analysis for the Project are not affected.

Comment No. 7-3

If you have any other questions or require additional information, please contact Mr. Toan Duong at (626) 458-4921 or tduong@dpw.lacounty.gov.

Response to Comment No. 7-3

The comment providing contact information for Department of Public Works staff is noted for the administrative record.
Comment Letter No. 8

Ali Poosti
Acting Division Manager
Wastewater Engineering Services Division
Bureau of Sanitation
City of Los Angeles

Comment No. 8-1

This is in response to your February 10, 2011 letter requesting a review of your proposed project. The Bureau of Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project.

WASTEWATER REQUIREMENT

The Bureau of Sanitation, Wastewater Engineering Services Division (WESD) is charged with the task of evaluating the local sewer conditions and to determine if available wastewater capacity exists for future developments. The evaluation will determine cumulative sewer impacts and guide the planning process for any future sewer improvements projects needed to provide future capacity as the City grows and develops.

Response to Comment No. 8-1

The introductory comments are noted and have been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the environmental analysis in the Draft EIR are responded to below.

Comment No. 8-2

Projected Wastewater Discharges for the Proposed Project:

<table>
<thead>
<tr>
<th>Type Description</th>
<th>Average Daily Flow per Type Description (GPD/UNIT)</th>
<th>Proposed No. of Units</th>
<th>Average Daily Flow (GPD)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mortuary: Living Area</td>
<td>80 GPD/1000 SQ.FT</td>
<td>22,500 SQ.FT</td>
<td>1,800</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
<td>1,800</td>
</tr>
</tbody>
</table>

Response to Comment No. 8-2

The projected net increase in wastewater discharges of 1,800 gallons per day referenced by the Bureau of Sanitation, Wastewater Engineering Services Division in the
III. Responses to Comments

Comment are less than the estimated increase in wastewater discharges of 4,815 gallons per day set forth in Section IV.K.1, Public Utilities—Wastewater, of the Draft EIR, which were calculated based on current demand rates for domestic water usage on the Project Site. Thus, with the reduced flows estimated by the Bureau of Sanitation, Wastewater Engineering Services Division, Project impacts related to wastewater would remain less than significant.

Comment No. 8-3
SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes the existing 8-inch line on Forest Lawn Dr. The sewage from the existing 8-inch line continues into a 48-inch North Outfall Sewer (NOS) line on Buena Vista St. The sewage then feeds into the Mariposa Siphon, before it discharges into a 48-inch sewer line on Forest Lawn R/W. The current flow level (d/D) in the 8-inch and 48-inch cannot be determined at this time as gauging is needed for these lines.

Based on our existing gauging information, the current approximate flow level (d/D) and the design capacities at d/D of 50% in the sewer system are as follows:

<table>
<thead>
<tr>
<th>Pipe Diameter (in)</th>
<th>Pipe Location</th>
<th>Current Gauging d/D (%)</th>
<th>50% Design Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>8</td>
<td>Forest Lawn Dr</td>
<td>*</td>
<td>229,323 GPD</td>
</tr>
<tr>
<td>48</td>
<td>Buena Vista St</td>
<td>*</td>
<td>14.93 MGD</td>
</tr>
<tr>
<td>48</td>
<td>Forest Lawn Dr</td>
<td>25</td>
<td>30.78 MGD</td>
</tr>
</tbody>
</table>

* No gauging available

Based on the estimated flows, it appears the sewer system might be able to accommodate the total flow for your proposed project. Further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. Ultimately, this sewage flow will be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the project.

Response to Comment No. 8-3

The description of the sewer infrastructure system serving the Project in the comment is consistent with the description provided in Section IV.K-1, Public Utilities—Wastewater, of the Draft EIR. Also consistent with the comment and as discussed in the Draft EIR, as part of the permit process, the Applicant will coordinate with the Los Angeles Department of Public Works to ensure that sufficient infrastructure capacity is available to
accommodate the Project. This comment also confirms the conclusion reached in the Draft EIR that the Hyperion Treatment Plan has sufficient capacity to accommodate the Project.

**Comment No. 8-4**

If you have any questions, please call Kwasi Berko of my staff at (323) 342-1562.

**Response to Comment No. 8-4**

The comment providing the contact information for Wastewater Engineering Services Division staff is noted for the administrative record.
Comment Letter No. 9

Ali Poosti
Acting Division Manager
Wastewater Engineering Services Division
Bureau of Sanitation
City of Los Angeles

Comment No. 9-1

This is in response to your March 25, 2011 letter requesting a review of your proposed project. The Bureau of Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project.

WASTEWATER REQUIREMENT

The Bureau of Sanitation, Wastewater Engineering Services Division (WESD) is charged with the task of evaluating the local sewer conditions and to determine if available wastewater capacity exists for future developments. The evaluation will determine cumulative sewer impacts and guide the planning process for any future sewer improvements projects needed to provide future capacity as the City grows and develops.

Response to Comment No. 9-1

The introductory comments are noted and have been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the environmental analysis in the Draft EIR are responded to below. This comment letter represents the second comment letter regarding wastewater infrastructure from the Bureau of Sanitation, Wastewater Engineering Services Division. Please refer to Comment Letter No. 8.

Comment No. 9-2

Projected Wastewater Discharges for the Proposed Project:

<table>
<thead>
<tr>
<th>Type Description</th>
<th>Average Daily Flow per Type Description (GPD/UNIT)</th>
<th>Proposed No. of Units</th>
<th>Average Daily Flow (GPD)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mortuary: Living Area</td>
<td>80 GPD/1000 SQ.FT</td>
<td>22,500 SQ.FT</td>
<td>1,800</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
<td>1,800</td>
</tr>
</tbody>
</table>
Response to Comment No. 9-2

As discussed in Response to Comment No. 8-2, the projected net increase in wastewater discharges of 1,800 gallons per day referenced by the Bureau of Sanitation, Wastewater Engineering Services Division in the comment are less than the estimated increase in wastewater discharges of 4,815 gallons per day set forth in Section IV.K.1, Public Utilities—Wastewater, of the Draft EIR, which were calculated based on current demand rates for domestic water usage on the Project Site. Thus, with the reduced flows estimated by the Bureau of Sanitation, Wastewater Engineering Services Division, Project impacts related to wastewater would remain less than significant.

Comment No. 9-3

SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes the existing 8-inch line on Forest Lawn Dr. The sewage from the existing 8-inch line feeds into a 10-inch line on Forest Lawn Dr R/W before discharging into the 48-inch North Outfall Sewer (NOS) line on Doran St. Figure 1 shows the details of the sewer system within the vicinity of the project. The current flow level (d/D) in the 8-inch and 10-inch lines cannot be determined at this time without additional gauging.

The current approximate flow level (d/D) and the design capacities at d/D of 50% in the sewer system are as follows:

<table>
<thead>
<tr>
<th>Pipe Diameter (in)</th>
<th>Pipe Location</th>
<th>Current Gauging d/D (%)</th>
<th>50% Design Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>8</td>
<td>Forest Lawn Dr</td>
<td>*</td>
<td>362,591 GPD</td>
</tr>
<tr>
<td>10</td>
<td>Forest Lawn Dr R/W</td>
<td>*</td>
<td>415,790 GPD</td>
</tr>
<tr>
<td>48</td>
<td>Doran St</td>
<td>64</td>
<td>14.93 MGD</td>
</tr>
</tbody>
</table>

* No gauging available

Based on the estimated flows, it appears the sewer system might be able to accommodate the total flow for your proposed project. Further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. Ultimately, this sewage flow will be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the project.

Response to Comment No. 9-3

As set forth in the comment, Comment No. 8-3 from the commentor, and Section IV.K-1, Public Utilities—Wastewater, of the Draft EIR, wastewater infrastructure serving the
Project Site includes the existing 8-inch line on Forest Lawn Drive, which connects to a 10-inch line where wastewater then flows into a 48-inch North Outfall Sewer (NOS) line in Buena Vista Street and then feeds into the Mariposa Siphon, before it continues along the 48-inch sewer line farther east along the Forest Lawn Drive right-of-way. The NOS carries flows easterly toward Doran Street and San Fernando Road. Consistent with the comment and as discussed in the Draft EIR, as part of the permit process, the Applicant will coordinate with the Los Angeles Department of Public Works to ensure that sufficient infrastructure capacity is available to accommodate the Project. This comment also confirms the conclusion reached in the Draft EIR that the Hyperion Treatment Plan has sufficient capacity to accommodate the Project.

**Comment No. 9-4**

If you have any questions, please call Kwasi Berko of my staff at (323) 342-1562.

**Response to Comment No. 9-4**

The comment providing the contact information for Wastewater Engineering Services Division staff is noted for the administrative record.
Comment Letter No. 10

Michael D. Forbes  
Assistant Community Development Director  
Community Development Department  
City of Burbank  
150 North Third St.  
P.O. Box 6459  
Burbank, CA  91510

Comment No. 10-1

The City of Burbank has reviewed the Draft Environmental Impact Report (DEIR) for the Forest Lawn Memorial-Park Master Plan. Due to the proximity of the project site to the city of Burbank, the City is concerned about the project and its potential impacts to residents, businesses and street networks.

Response to Comment No. 10-1

The introductory comments are noted and have been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the environmental analysis in the Draft EIR are responded to below.

Comment No. 10-2

It is our understanding that the proposed project construction would occur over an approximately 40-year period, from approximately 2011 to 2050 and consist of the construction of approximately 22,500 square feet of floor area for new structures and approximately 1,100,000 square feet of non-occupied floor area.

It is also our understanding that over an estimated 15-year construction period, implementation of the proposed project would require approximately 1,728,000 cubic yards of cut and approximately 1,015,000 cubic yards of fill, for a net export amount of approximately 713,000 cubic yards. In response to the NOP for the proposed project, the City previously requested an analysis on the haul route and any street or intersection that may be impacted in the City of Burbank as a result of materials export and an estimated timeline of the export over the 15-year construction period. These issues do not appear to have been adequately addressed in the DEIR and the City of Burbank respectfully requests that these issues be given a more in-depth analysis in the Final Environmental Impact Report.
Response to Comment No. 10-2

The commentor’s understanding of the Project construction activities is correct. The City of Burbank’s comment letter on the NOP referenced in the comment is attached in Appendix A to the Draft EIR. The proposed Project grading and stockpiling plan is described on page II-16 in the Project Description in the Draft EIR. As the Draft EIR explains, the estimated 15-year construction period would include three phases of grading. The majority of the grading would occur in Phase 1 (Central Area Grading). As part of Phase 1, soil would be stockpiled in the West Grading Area and/or transported off-site. Phase 2 would involve grading in the East Area with soil exported off-site and/or stockpiled in the West Grading Area. Phase 3 would involve grading in the West Area of the Project Site with soil stockpiled and/or transported off-site. The export of soil during the Project would be dependent upon market conditions and construction sites looking for suitable soil for fill material that become available. (See page II-16 of the Draft EIR.) As noted in the Draft EIR, the most extensive hauling operations would be expected to occur over an approximate 5-year period during Phase 2 in connection with export of soil excavated during the Phase 1 grading of the Central Area, however, as noted above, the export of soil during the Project would be dependent on market conditions and construction sites looking for suitable soil for fill material that become available. (See page II-19 of the Draft EIR.)

As described on Page IV.J-9 of the Draft EIR, the route used by the haul trucks would be to and from the SR-134 Freeway via Forest Lawn Drive. Direct and full freeway access is provided by the freeway ramps designated for Forest Lawn Drive, which haul trucks would directly access to and from the Project Site. A project design feature to this effect has been included as part of the Project. (See Subsection IV.J, Traffic Circulation and Parking, of Section II, Corrections and Additions, of this Final EIR.) Therefore, no City of Burbank intersection or street would be used by Project haul trucks to access the Project Site. In addition, as set forth in Section II, Corrections and Additions, of this Final EIR, a project design feature has been included as part of the Project that will limit hauling during the peak traffic hours and provides for the hauling of excavated soil from the Project Site to occur primarily at night.

Comment No. 10-3

Thank you in advance for your attention to the concerns raised in this letter. Should you have any questions or concerns, please contact Amanda Klotzsche, Assistant Planner at 818-238-5250 or by email at aklotzsche@ci.burbank.ca.us

Response to Comment No. 10-3

The comment providing contact information for City of Burbank staff is noted for the administrative record.
Comment Letter No. 11

Jin Hwang  
Civil Engineering Associate  
Los Angeles Department of Water and Power  
Water Resources Development Group  
jin.hwang@ladwp.com

Comment No. 11-1

The Water Resources Division received a Request for Comments on Draft EIR for the Forest Lawn Memorial Park - Hollywood Hills Master Plan (dated February 10, 2011) from the Planning Department.

Response to Comment No. 11-1

The comment acknowledges receipt of the Forest Lawn Memorial-Park–Hollywood Hills Master Plan Draft EIR by the Department of Water and Power. The introductory comments are noted and have been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the environmental analysis in the Draft EIR are responded to below.

Comment No. 11-2

After reviewing the Section IV.K.2 Public Utilities - Water, we have the following comments:

<table>
<thead>
<tr>
<th>#</th>
<th>Section</th>
<th>Page</th>
<th>Comment</th>
</tr>
</thead>
</table>

Response to Comment No. 11-2

In response to the comment, the text on page IV.K-15 of Section IV.K.2, Public Utilities—Water, of the Draft EIR, has been revised to indicate that the City of Los Angeles water system has 114 tanks and reservoirs rather than 108 tanks and reservoirs. Please refer to Section II, Corrections and Additions of this Final EIR. This modification does not change any of the conclusions reached in the Draft EIR and impacts to water supply would continue to be less than significant.

Comment No. 11-3

<table>
<thead>
<tr>
<th>#</th>
<th>Section</th>
<th>Page</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>IV.K.2.1.a</td>
<td>IV.K-15</td>
<td>Revise “102 pressure zones” to “126 pressure zones”.</td>
</tr>
</tbody>
</table>

City of Los Angeles  
Forest Lawn Memorial-Park–Hollywood Hills Master Plan  
SCH. No. 2008111048  
January 2012  
Page III-101
Response to Comment No. 11-3

In response to the comment, the text on page IV.K-15 of Section IV.K.2, Public Utilities—Water, of the Draft EIR, has been revised to indicate that the City’s water system has been divided into 126 pressure zones rather than 102 pressure zones. Please refer to Section II, Corrections and Additions, of this Final EIR. This modification does not change any of the conclusions reached in the Draft EIR and impacts to water supply would continue to be less than significant.

Comment No. 11-4

Update the water supply table as the following:

<table>
<thead>
<tr>
<th>Calendar Year</th>
<th>Los Angeles Aqueduct</th>
<th>Local Groundwater</th>
<th>MWD Water</th>
<th>Recycled</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>2000</td>
<td>255,136</td>
<td>85,156</td>
<td>341,772</td>
<td>2,200</td>
<td>2,569</td>
</tr>
<tr>
<td>2001</td>
<td>266,480</td>
<td>80,241</td>
<td>302,594</td>
<td>1,675</td>
<td>-1,994</td>
</tr>
<tr>
<td>2002</td>
<td>179,237</td>
<td>85,153</td>
<td>401,303</td>
<td>1,944</td>
<td>-1,405</td>
</tr>
<tr>
<td>2003</td>
<td>251,340</td>
<td>86,341</td>
<td>317,774</td>
<td>1,759</td>
<td>2,528</td>
</tr>
<tr>
<td>2004</td>
<td>203,190</td>
<td>75,696</td>
<td>392,603</td>
<td>1,774</td>
<td>-2,958</td>
</tr>
<tr>
<td>2005</td>
<td>376,394</td>
<td>57,623</td>
<td>184,192</td>
<td>1,401</td>
<td>3,140</td>
</tr>
<tr>
<td>2006</td>
<td>380,235</td>
<td>67,299</td>
<td>189,975</td>
<td>3,893</td>
<td>-1,336</td>
</tr>
<tr>
<td>2007</td>
<td>127,392</td>
<td>88,041</td>
<td>438,344</td>
<td>3,595</td>
<td>1,044</td>
</tr>
<tr>
<td>2008</td>
<td>148,407</td>
<td>64,604</td>
<td>430,959</td>
<td>7,048</td>
<td>1,664</td>
</tr>
<tr>
<td>2009</td>
<td>137,261</td>
<td>66,998</td>
<td>357,005</td>
<td>7,570</td>
<td>3,052</td>
</tr>
<tr>
<td>2010</td>
<td>251,126</td>
<td>67,250</td>
<td>208,264</td>
<td>6,900</td>
<td>-938</td>
</tr>
</tbody>
</table>

Response to Comment No. 11-4

In response to the comment, Table IV.K-2 on page IV.K-16 of Section IV.K.2, Public Utilities—Water, of the Draft EIR, has been updated to reflect the water supply data provided in this comment. Please refer to Section II, Corrections and Additions, of this Final EIR. This modification does not change any of the conclusions reached in the Draft EIR and impacts to water supply would continue to be less than significant.

Comment No. 11-5

Update the 2009 LAA water supply information to 2010 water supply information based on the updated Table IV.K-2
Response to Comment No. 11-5

In response to the comment, the text on page IV.K-16 of Section IV.K.2, Public Utilities—Water, of the Draft EIR, has been updated based on updated water supply information provided by the Los Angeles Department of Water and Power. Please refer to Section II, Corrections and Additions, of this Final EIR. This modification does not change any of the conclusions reached in the Draft EIR and impacts to water supply would continue to be less than significant.

Comment No. 11-6

<table>
<thead>
<tr>
<th></th>
<th>IV.K.2.1.a(2)</th>
<th>IV.K-17</th>
<th>1</th>
</tr>
</thead>
</table>
|   | Update the 2008-2009 runoff year groundwater extraction information to 2009-2010 based on the updated Table IV.K-3.

Response to Comment No. 11-6

In response to the comment, the text page IV.K-17 of Section IV.K.2, Public Utilities—Water, of the Draft EIR, has been updated to reflect updated local groundwater basin supply information provided by the Los Angeles Department of Water and Power. Please refer to Section II, Corrections and Additions, of this Final EIR. This modification does not change any of the conclusions reached in the Draft EIR and impacts to water supply would continue to be less than significant.

Comment No. 11-7

<table>
<thead>
<tr>
<th></th>
<th>IV.K.2.1.a(2)</th>
<th>IV.K-17</th>
<th>5</th>
</tr>
</thead>
</table>
|   | Update the 2008-2009 water year groundwater extraction information to 2009-2010 based on the updated Table IV.K-3.

Response to Comment No. 11-7

In response to the comment, the text on page IV.K-17 of Section IV.K.2, Public Utilities—Water, of the Draft EIR, has been updated to reflect updated local groundwater basin supply information provided by the Los Angeles Department of Water and Power. Please refer to Section II, Corrections and Additions, of this Final EIR. This modification does not change any of the conclusions reached in the Draft EIR and impacts to water supply would continue to be less than significant.
Comment No. 11-8

<table>
<thead>
<tr>
<th>7</th>
<th>IV.K.2.1.a(2), Table IV.K-3</th>
<th>IV.K-18</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Update the Groundwater Basin Supply table with the following updated data:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Water Year (Oct-Sep)</td>
<td>San Fernando</td>
</tr>
<tr>
<td>2004-2005</td>
<td>49,065</td>
<td>1,110</td>
</tr>
<tr>
<td>2005-2006</td>
<td>38,042</td>
<td>2,175</td>
</tr>
<tr>
<td>2006-2007</td>
<td>76,251</td>
<td>3,919</td>
</tr>
<tr>
<td>2007-2008</td>
<td>50,009</td>
<td>2,997</td>
</tr>
<tr>
<td>2008-2009</td>
<td>52,896</td>
<td>868</td>
</tr>
<tr>
<td>2009-2010</td>
<td>59,958</td>
<td>2,544</td>
</tr>
</tbody>
</table>

Note: Units are in AF

Runoff Year (Apr-Mar) Owens Valley (AFY)

<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>2009-10</td>
<td>65,425</td>
<td></td>
</tr>
<tr>
<td>2008-09</td>
<td>68,971</td>
<td></td>
</tr>
<tr>
<td>2007-08</td>
<td>60,338</td>
<td></td>
</tr>
<tr>
<td>2006-07</td>
<td>58,621</td>
<td></td>
</tr>
<tr>
<td>2005-06</td>
<td>56,766</td>
<td></td>
</tr>
<tr>
<td>2004-05</td>
<td>85,820</td>
<td></td>
</tr>
<tr>
<td>2003-04</td>
<td>87,732</td>
<td></td>
</tr>
<tr>
<td>2002-03</td>
<td>81,979</td>
<td></td>
</tr>
<tr>
<td>2001-02</td>
<td>73,349</td>
<td></td>
</tr>
</tbody>
</table>

Response to Comment No. 11-8

In response to the comment, Table IV.K-3 on page IV.K-18 of Section IV.K.2, Public Utilities—Water, of the Draft EIR, has been updated based on the data provided by the Los Angeles Department of Water and Power in this comment. Please refer to Section II, Corrections and Additions, of this Final EIR. This modification does not change any of the conclusions reached in the Draft EIR and impacts to water supply would continue to be less than significant.

Comment No. 11-9

<table>
<thead>
<tr>
<th>8</th>
<th>IV.K.2.1.a(3)</th>
<th>IV.K-18</th>
<th>1</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Update the 2009 MWD water supply information to 2010 water supply information based on the updated Table IV.K-2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Response to Comment No. 11-9

In response to the comment, the text on page IV.K-18 of Section IV.K.2, Public Utilities—Water, of the Draft EIR, has been updated to reflect information provided in updated Table IV.K-2 provided by the Los Angeles Department of Water and Power. Please refer to Section II, Corrections and Additions, of this Final EIR. This modification does not change any of the conclusions reached in the Draft EIR and impacts to water supply would continue to be less than significant.
Comment No. 11-10

<table>
<thead>
<tr>
<th>Comment No. 11-10</th>
<th>IV.K.2.1.a(3)</th>
<th>IV.K-19</th>
<th>3</th>
<th>Revise</th>
</tr>
</thead>
<tbody>
<tr>
<td>9</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Response to Comment No. 11-10

The text on page IV.K-19 of Section IV.K.2, Public Utilities—Water, of the Draft EIR, has been revised based on the information provided in this comment by the Los Angeles Department of Water and Power. Please refer to Section II, Corrections and Additions, of this Final EIR. This modification does not change any of the conclusions reached in the Draft EIR and impacts to water supply would continue to be less than significant.

Comment No. 11-11

<table>
<thead>
<tr>
<th>Comment No. 11-11</th>
<th>IV.K.2.1.a(3)(b)</th>
<th>IV.K-23</th>
<th>1</th>
<th>Update the SWP allocation information as the following (<a href="http://www.water.ca.gov/swpao/deliveries.cfm">http://www.water.ca.gov/swpao/deliveries.cfm</a>):</th>
</tr>
</thead>
<tbody>
<tr>
<td>9</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Response to Comment No. 11-11

In response to the comment, the text on page IV.K-23 of Section IV.K.2, Public Utilities—Water, of the Draft EIR, has been revised based on the information provided by
the Los Angeles Department of Water and Power. Please refer to Section II, Corrections and Additions, of this Final EIR. This modification does not change any of the conclusions reached in the Draft EIR and impacts to water supply would continue to be less than significant.

**Comment No. 11-12**

<table>
<thead>
<tr>
<th></th>
<th>IV.K.2.1.a(4)</th>
<th>IV.K-23</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>Revise the word “Currently”. The recycled water supply amount shown is based on the 2005 Urban Water Management Plan page 3-21.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Response to Comment No. 11-12**

In response to the comment, the text on page IV.K-23 of Section IV.K.2, Public Utilities—Water, of the Draft EIR, has been revised. Please refer to Section II, Corrections and Additions, of this Final EIR. This modification does not change any of the conclusions reached in the Draft EIR and impacts to water supply would continue to be less than significant.

**Comment No. 11-13**

<table>
<thead>
<tr>
<th></th>
<th>IV.K.2.1.e(1)(a)</th>
<th>IV.K-27</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>12</td>
<td>The 2010 UWMP is scheduled to be submitted to the California Department of Water Resources by July, 2011.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Response to Comment No. 11-13**

In response to the comment, the text on page IV.K-27 of Section IV.K.2, Public Utilities—Water, of the Draft EIR, has been revised to reflect updated information provided by the Los Angeles Department of Water and Power. The information from LADWP has also been further updated to reflect that the 2010 UWMP was accepted by the DWR in September 2011. Please refer to Section II, Corrections and Additions, of this Final EIR. This modification does not change any of the conclusions reached in the Draft EIR and impacts to water supply would continue to be less than significant.

**Comment No. 11-14**

<table>
<thead>
<tr>
<th></th>
<th>IV.K.2.1.e(3)(b)</th>
<th>IV.K-34</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>13</td>
<td>Revise “City of LADWP” to “City of Los Angeles”.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Response to Comment No. 11-14**

In response to the comment, the text on page IV.K-34 of Section IV.K.2, Public Utilities—Water, of the Draft EIR, has been revised to correct a typographical error. Please refer to Section II, Corrections and Additions, of this Final EIR. This modification does not
change any of the conclusions reached in the Draft EIR and impacts to water supply would continue to be less than significant.

**Comment No. 11-15**

| 14 | IV.K.2.1.e(3)(c) | IV.K-35 | 3 | Replace this paragraph (Moreover, LAMC Sections 122.00-122.10…) with information from LAMC Chapter XII, Article V Sections 125.00-125-07. |

**Response to Comment No. 11-15**

In response to the comment, the text on page IV.K.-35 of Section IV.K.2, Public Utilities—Water, of the Draft EIR, has been revised to include information from LAMC Chapter XII, Article V, Sections 125.00–125-07, Water Efficiency Requirements for New Development and Renovation of Existing Buildings. Please refer to Section II, Corrections and Additions, of this Final EIR. This modification does not change any of the conclusions reached in the Draft EIR and impacts to water supply would continue to be less than significant.

**Comment No. 11-16**

| 15 | IV.K.2.1.e(3)(c) | IV.K-35 | 4 | The Emergency Water Conservation Plan Ordinance is Chapter XII, Article I, LAMC Sections 121.00-121-11, not Chapter XIII Sections 121.00-121-13. Also, the number of phases has been consolidated from six to five per Ordinance 181,288 (http://clkrep.lacity.org/onlinedocs/2009/09-0369-s9_ord_181288.pdf) |

**Response to Comment No. 11-16**

In response to the comment, the text on page IV.K-35 of Section IV.K.2, Public Utilities—Water, of the Draft EIR, has been revised based on the information provided by the Los Angeles Department of Water and Power. Please refer to Section II, Corrections and Additions, of this Final EIR. This modification does not change any of the conclusions reached in the Draft EIR and impacts to water supply would continue to be less than significant.

**Comment No. 11-17**

| 16 | IV.K.2.2.d(2) | IV.K-39 | 3 | Revise LADWP’s recommendation of water conservation to water conservation requirements per LAMC Chapter XII, Article V Sections 125.00-125-07 (See Comment #14). |
Response to Comment No. 11-17

In response to the comment, the text on page IV.K-39 of Section IV.K.2, Public Utilities—Water, of the Draft EIR has been revised based on the information provided by the Los Angeles Department of Water and Power. Please refer to Section II, Corrections and Additions, of this Final EIR. This modification does not change any of the conclusions reached in the Draft EIR and impacts to water supply would continue to be less than significant.

Comment No. 11-18

Please forward the above comments to Adam Villani of the City of Los Angeles Department of City Planning, EIR Unit, along with other comments from LADWP on this DEIR. Thank you.

Response to Comment No. 11-18

The comments in this letter have been received by Mr. Adam Villani, City Planner at the City of Los Angeles Department of City Planning and have been responded to as part of this Final EIR.
Comment Letter No. 12

Luis Nuno
East Valley District
Water Distribution Engineering
LADWP—Water
luis.nuno@water.ladwp.com

Comment No. 12-1

Water Distribution Engineering has reviewed the Forest Lawn Memorial Park Hollywood Hills Master Plan and found it to be generally accurate and acceptable. We have no further comments.

Please incorporate our comments to those of others in the Water System in your reply to City Planning.

Response to Comment No. 12-1

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment Letter No. 13

Charles C. Holloway  
Manager of Environmental Assessment and Planning  
Department of Water and Power  
111 N. Hope St.  
Los Angeles, CA  90012-2607

Comment No. 13-1

Thank you for including the Los Angeles Department of Water and Power (LADWP) in the environmental review process for the Forest Lawn Memorial Park, Hollywood Hills Master Plan (Project). After having reviewed the Draft Environmental Impact Report (EIR) we would like to submit the following comments, referred to as Attachment 1, for your consideration and incorporation into the Final EIR.

We appreciate having had the opportunity to review and comment on the Draft EIR, and look forward to reviewing the Final EIR when it is available. Please continue to include LADWP in your mailing list and address it, and any questions you may have, to Mr. Michael Mercado of my staff at 213-367-0395.


1. Section IV.K.2.1.a, page IV.K-15, paragraph 1:
   
   - LADWP Facts & Figures 2010 

2. Section IV.K.2.1.a, page IV.K-15, paragraph 1:
   
   - Revise “102 pressure zones” to “126 pressure zones”

3. Section IV.K.2.1.a(1), table IV.K-2, page IV.K-16:
   
   - Update the water supply table as the following:
III. Responses to Comments

Los Angeles Department of Water and Power 2000-2010 Water Supply

<table>
<thead>
<tr>
<th>Calendar Year</th>
<th>Los Angeles Aqueduct</th>
<th>Local Groundwater</th>
<th>MWD</th>
<th>Recycled Water</th>
<th>Transfer, Spread, Spill, &amp; Storage Change</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>2000</td>
<td>255,136</td>
<td>85,156</td>
<td>341,772</td>
<td>2,200</td>
<td>2,569</td>
<td>681,695</td>
</tr>
<tr>
<td>2001</td>
<td>266,480</td>
<td>80,241</td>
<td>302,594</td>
<td>1,675</td>
<td>-1,994</td>
<td>652,983</td>
</tr>
<tr>
<td>2002</td>
<td>179,237</td>
<td>85,153</td>
<td>401,303</td>
<td>1,944</td>
<td>-1,405</td>
<td>669,042</td>
</tr>
<tr>
<td>2003</td>
<td>251,340</td>
<td>86,341</td>
<td>317,774</td>
<td>1,759</td>
<td>2,528</td>
<td>654,687</td>
</tr>
<tr>
<td>2004</td>
<td>203,190</td>
<td>75,696</td>
<td>392,603</td>
<td>1,774</td>
<td>-2,958</td>
<td>676,221</td>
</tr>
<tr>
<td>2005</td>
<td>376,394</td>
<td>57,623</td>
<td>164,192</td>
<td>1,401</td>
<td>3,140</td>
<td>616,470</td>
</tr>
<tr>
<td>2006</td>
<td>380,235</td>
<td>67,299</td>
<td>189,975</td>
<td>3,893</td>
<td>-1,336</td>
<td>642,738</td>
</tr>
<tr>
<td>2007</td>
<td>127,392</td>
<td>88,041</td>
<td>438,344</td>
<td>3,595</td>
<td>1,044</td>
<td>656,327</td>
</tr>
<tr>
<td>2008</td>
<td>148,407</td>
<td>64,604</td>
<td>430,959</td>
<td>7,048</td>
<td>1,664</td>
<td>649,354</td>
</tr>
<tr>
<td>2009</td>
<td>137,261</td>
<td>66,998</td>
<td>357,005</td>
<td>7,570</td>
<td>3,052</td>
<td>565,782</td>
</tr>
<tr>
<td>2010</td>
<td>251,126</td>
<td>67,250</td>
<td>208,264</td>
<td>6,900</td>
<td>-938</td>
<td>534,478</td>
</tr>
</tbody>
</table>

4. Section IV.K.2.1.a(1), page IV.K-16, paragraph 1:
   - Update the 2009 LAA water supply information to 2010 water supply information based on the updated Table IV.K-2

5. Section IV.K.2.1.a(2), page IV.K-17, paragraph 1:
   - Update the 2008-2009 runoff year groundwater extraction information to 2009-2010 based on the updated Table IV.K-3 (on item 7, below)

6. Section IV.K.2.1.a(2), page IV.K-17, paragraph 5:
   - Update the 2008-2009 water year groundwater extraction information to 2009-2010 based on the updated Table IV.K-3 (on item 7, below)

7. Section IV.K.2.1.a(2), Table IV.K-3, page IV.K-18:
   - Update the Groundwater Basin Supply table with the following updated data:
III. Responses to Comments

<table>
<thead>
<tr>
<th>Water Year (Oct-Sep)</th>
<th>San Fernando</th>
<th>Sylmar</th>
<th>Central</th>
</tr>
</thead>
<tbody>
<tr>
<td>2004-2005</td>
<td>49,085</td>
<td>1,110</td>
<td>13,401</td>
</tr>
<tr>
<td>2005-2006</td>
<td>38,042</td>
<td>2,175</td>
<td>13,725</td>
</tr>
<tr>
<td>2006-2007</td>
<td>76,251</td>
<td>3,919</td>
<td>13,609</td>
</tr>
<tr>
<td>2007-2008</td>
<td>50,009</td>
<td>2,997</td>
<td>10,754</td>
</tr>
<tr>
<td>2008-2009</td>
<td>52,896</td>
<td>868</td>
<td>11,817</td>
</tr>
<tr>
<td>2009-2010</td>
<td>59,958</td>
<td>2,544</td>
<td>11,135</td>
</tr>
</tbody>
</table>

Note: Units are in AF

<table>
<thead>
<tr>
<th>Runoff Year (Apr-Mar)</th>
<th>Owens Valley (AFY)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2009-10</td>
<td>65,425</td>
</tr>
<tr>
<td>2008-09</td>
<td>68,971</td>
</tr>
<tr>
<td>2007-08</td>
<td>60,338</td>
</tr>
<tr>
<td>2006-07</td>
<td>58,621</td>
</tr>
<tr>
<td>2005-06</td>
<td>56,766</td>
</tr>
<tr>
<td>2004-05</td>
<td>85,820</td>
</tr>
<tr>
<td>2003-04</td>
<td>87,732</td>
</tr>
<tr>
<td>2002-03</td>
<td>81,979</td>
</tr>
<tr>
<td>2001-02</td>
<td>73,349</td>
</tr>
</tbody>
</table>

8. Section IV.K.2.1.a(3), page IV.K-18, paragraph 1:

- Update the 2009 MWD water supply information to 2010 water supply information based on the updated Table IV.K-2

9. Section IV.K.2.1.a(3), page IV.K-19, paragraph 3:

- Revise sentence to read as follows:

  “In addition, the MWD has more than 5.0 million AF of storage capacity available in reservoirs and banking/transfer programs, with approximately 1.676 million AF currently in that storage and approximately 626 thousand AF in emergency storage.”

10. Section IV.K.2.1.a(3)(b), page IV.K-23, paragraph 1:

- Update the SWP allocation information as the following:

  (http://www.water.ca.gov/swpao/deliveries.cfm)

  “On November 22, 1010, the DWR announced an initial 2011 SWP allocation of 25 percent of total contracted water deliveries to the SWP contractors. The initial allocation figure reflects the low carryover storage levels in the state’s major reservoirs, ongoing drought conditions and federally mandated environmental restrictions on water deliveries from the Sacramento-San Joaquin Delta to protect endangered fish species. However, the initial
allocation is a very conservative estimate of what DWP expects it can deliver, and historically the initial allocation increased during the year as supply conditions improved.

On March 15, 2011, the DWR announced that its 2011 SWP allocation would increase to 70 percent of total contracted water deliveries to the SWP contractors. The allocation figure reflects the recent precipitation conditions, existing storage in SWP conservation reservoirs, SWP operational constraints such as the conditions of the recent Biological Opinions for delta smelt and salmonids and the longfin smelt incidental take permit, and 2011 projected contractor demands. DWR may revise allocations if warranted by the year’s developing hydrologic and water supply conditions.”

11. Section IV.K.2.1.a(4), page IV.K-23, paragraph 1:

- Revise the word “Currently”. [The recycled water supply amount shown is based on the 2005 Urban Water Management Plan page 3-21.

12. Section IV.K.2.1.e (1)(a), page IV.K-27, paragraph 1:

- The 2010 UWMP is scheduled to be submitted to the California Department of Water Resources by July, 2011.

13. Section IV.K.2.1.e (3)(b), page IV.K-34, paragraph 1:

- Revise “City of LADWP” to “City of Los Angeles”.

14. Section IV.K.2.1.e (3)(c), page IV.K-35, paragraph 3:

- Replace this paragraph (Moreover, LAMC Sections 122.00-122.10...) with information from LAMC Chapter XII, Article V Sections 125.00-125-07.

15. Section IV.K.2.1.e (3)(c), page IV.K-35, paragraph 4:

- The Emergency Water Conservation Plan Ordinance is Chapter XII, Article I, LAMC Sections 121.00-121-11, not Chapter XIII Sections 121.00-121-13. Also, the number of phases has been consolidated from six to five per Ordinance 181,288 (http://clkrep.lacity.org/onlinedocs/2009/09-0369-s9_ord_181288.pdf).
16. Section IV.K.2.2.d (2), page IV.K-39, paragraph 3:

- Revise LADWP’s recommendation of water conservation to water conservation requirements per LAMC Chapter XII, Article V Sections 125.00-125-07 (See Comment #14).

**Response to Comment No. 13-1**

The comment states the same comments as Comment Letter No. 11 from Jin Hwang at LADWP. Please refer to the responses to Comment Letter No. 11 for responses to each of the comments raised in this comment.
Comment Letter No. 14

Tom LaBonge
Councilmember 4th District
City Council of the City of Los Angeles
City Hall, Rm. 480
Los Angeles, CA 90012

Comment No. 14-1

The Draft Environmental Report for this project was released on February 10, 2011 and the public comment period ends on March 28, 2011.

Several associations and groups have requested that the public comment period be extended due to the large volume, citing that they would not have sufficient time for review.

I would ask for a 30-day extension. Thank you for accommodating my request.

Response to Comment No. 14-1

The specific procedures and time period for public review of a Draft Environmental Impact Report are mandated by state law in Sections 15087 and 15105 of the CEQA Guidelines. Specifically, Section 15105(a) states: “The public review period for a draft EIR should not be less than 30 days nor longer than 60 days except in unusual circumstances.”

Consistent with the requirements of CEQA, the Draft EIR was submitted to the State Clearinghouse, Office of Planning and Research, and was originally circulated for public review for a 45-day period. This 45-day comment period began on February 11, 2011. In response to requests to extend the review period, on March 25, 2011, the City of Los Angeles extended the comment period by an additional 15 days to April 13, 2011. Thus, the Draft EIR was circulated for a 60-day public review period, which exceeds the 45-day public review period required by CEQA Guidelines Section 15105 when a Draft EIR is submitted to the State Clearinghouse for review by State agencies. There were no unusual circumstances identified by the City to warrant an extension beyond the 60-day maximum set by state law in Section 15105(a) of the CEQA Guidelines. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment Letter No. 15

Renee Weitzer
Chief, Land Use Planning
renee.weitzer@lacity.org

Comment No. 15-1
Just giving you a “heads Up” we are doing a letter asking for a 30-day extension of the comment period. thanks.

Response to Comment No. 15-1
The letter referenced in the comment is included in the Final EIR as Comment Letter No. 14. Please refer to Response to Comment No. 14-1 regarding the extended public review period for the Draft EIR.
III. Responses to Comments

Comment Letter No. 16

Renee Weitzer  
Chief, Land Use Planning  
renee.weitzer@lacity.org

Comment No. 16-1

Did you receive our letter for an extension to the comment period?

Response to Comment No. 16-1

The letter referenced in the comment is included in the Final EIR as Comment Letter No. 14. Please refer to Response to Comment No. 14-1 regarding the extended public review period for the Draft EIR.
III. Responses to Comments

Comment Letter No. 17

Adrian Scott Fine  
Directory of Advocacy  
Los Angeles Conservancy  
523 West Sixth St., Ste. 826  
Los Angeles, California 90014

Comment No. 17-1

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Forest Lawn Memorial-Park–Hollywood Hills Master Plan. The Los Angeles Conservancy is the largest local preservation organization in the United States, with over 6,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles through advocacy and education.

The Conservancy appreciates the efforts to identify and avoid significant adverse impacts on historic and cultural resources within the project area. Forest Lawn Memorial-Park–Hollywood Hills exemplifies the memorial park cemetery design pioneered by owner Hubert Eaton and initially developed in his 1920s and 1930s redesign of Forest Lawn Memorial-Park in Glendale. The park-like setting, in-ground memorial tablets in place of headstones, and associated buildings and architectural elements at the Hollywood Hills site are among the character-defining features of the cemetery’s overall landscape. With nine identified contributing features and a period of significance ranging from 1951 to 1966, Forest Lawn Memorial-Park–Hollywood Hills was determined eligible in the DEIR for the California Register as a designed historic landscape.

Response to Comment No. 17-1

The introductory comments are noted and have been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the environmental analysis in the Draft EIR are responded to below.

Comment No. 17-2

It appears the proposed master plan intends to construct new facilities on undeveloped areas of the Hollywood Hills site in a manner consistent with the current landscape and use of Forest Lawn. Nonetheless, two contributing features, the Maintenance Office and Maintenance Garage, both dating from 1955, are slated for removal with no replacement project identified. Although modest and utilitarian, these two structures reflect Eaton’s goal...
to offer a full range of undertaking services at the site and are the sole examples of their type remaining.

**Response to Comment No. 17-2**

As the comment notes, the Project includes the construction of new facilities and interment areas within undeveloped portions of the Project Site in a manner consistent with the current landscape and cemetery use of the Project Site. As the comment notes, and as described on page IV.D-18 of the Draft EIR, as part of the Project, two maintenance buildings identified as contributing features of secondary significance would be removed. These two buildings are the Maintenance Office and Maintenance Garage, both constructed in 1955. Although the Project may remove Maintenance Office and Garage buildings, the repair and maintenance activities that currently occur in the Maintenance Office and Garage buildings would continue within other existing structures on the Project Site, thus continuing the historical use of the Memorial-Park in the same general area. As the comment notes, and as noted on page IV.D-13 of the Draft EIR, the maintenance buildings reflect Hubert Eaton's desire to expand Forest Lawn's services to include a full range of undertaking services. The Maintenance Office and Maintenance Garage are the only contributing features of secondary significance; however, there are other types of features such as the Flower Shop and Mortuary (a contributing feature) and the Warehouse and Lunch Room (a non-contributing architectural feature) that represent the full-service aspect of the Forest Lawn Memorial-Park–Hollywood Hills property. As the Draft EIR explains, the maintenance features are separated from the landscaped area of the Memorial-Park and were historically screened from public view through changes in topography and dense landscaping. Continued preservation of the Memorial-Park and its primary contributing features may necessitate changes to the support and maintenance buildings that enable the property's historic use to continue. (See pages IV.D-18 through IV.D-19 of the Draft EIR.) However, the Memorial-Park will continue to include maintenance activities, as well as the maintenance yard that is screened from public view.

**Comment No. 17-3**

To ensure the operational component of Eaton’s concept is retained, we urge the inclusion of additional mitigation measures that explore the feasibility of reuse if demolition is proposed for the Maintenance Office and/or Maintenance Garage.

**Response to Comment No. 17-3**

As explained in the Historical Resources Assessment for the Project, attached as Appendix D-1 to the Draft EIR, and Section IV.D.1, Cultural Resources—Historic Resources, of the Draft EIR, the potential demolition of the Maintenance Office and Maintenance Garage would not materially impact the Forest Lawn Memorial-Park–Hollywood Hills such that their demolition would threaten the Memorial-Park’s apparent
eligibility for California Register listing, or eligibility for Los Angeles Historic Cultural Monument listing. While the maintenance buildings were constructed during Forest Lawn’s period of significance (1951–1966) and have historical associations with Hubert Eaton, they are of secondary significance in the context of the Memorial-Park as a designed historic landscape. These maintenance features are separated from the landscaped area of the Memorial-Park and were historically screened from public view through changes in topography and dense landscaping. Continued preservation of the Memorial-Park may necessitate changes to the support and maintenance buildings that enable the property’s historic use to continue. The potential demolition of the maintenance buildings would not have a significant adverse impact on the potentially eligible developed portions of the Memorial-Park, nor would it result in significant impacts with respect to any historic resource under CEQA. (See pages IV.D-18 through IV.D-19 of the Draft EIR.)

Although implementation of the proposed Project would result in less-than-significant impacts to historic resources, mitigation was proposed to further reduce any potential impacts. Specifically, Mitigation Measure D.1-1, set forth on page IV.D-20 of the Draft EIR, would require photographic documentation of the building proposed for demolition similar to the Historic American Buildings Survey (HABS) in the event that one or more of the two contributing features of secondary significance in the maintenance area occurs. The comment’s suggestion of additional measures that explore the feasibility of reuse is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 17-4
At a minimum, these two buildings should be relocated elsewhere on the Hollywood Hills site and within the boundaries of the designed historic landscape to avoid demolition.

Response to Comment No. 17-4
The comment’s suggestion regarding relocation of the maintenance buildings elsewhere on the Project Site within the boundaries of the designed historic landscape rather than demolition is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. As explained above in Response to Comment No. 17-2, the Draft EIR and Historical Resources Assessment concluded that potential impacts associated with the Project would be less than significant. Nonetheless, Mitigation Measure D.1-1, set forth on page IV.D-20 of the Draft EIR, was included in the Draft EIR and would further reduce the less-than-significant impacts due to the demolition of the Maintenance Office and Maintenance Garage.

Relocation of the maintenance buildings would not be appropriate in the context of Forest Lawn Memorial-Park–Hollywood Hills because the maintenance area is in a section that is visually screened and physically isolated from the historic designed landscape. As
described on pages IV.D-18 through IV.D-19 of the Draft EIR, these maintenance features are separated from the landscaped area of the Memorial-Park and were historically screened from public view through changes in topography and dense landscaping. The maintenance area is not much larger in area than the current building footprints, leaving little room within the maintenance area for relocation. Therefore, any relocation of the maintenance buildings would either require an expansion of the maintenance area into the historic designed landscape or relocation of the buildings into the landscape. Either relocation scenario would negatively impact the historic setting and design integrity of Forest Lawn Memorial-Park–Hollywood Hills and is thus not recommended.

Comment No. 17-5

The Conservancy also urges Forest Lawn to consider creation of a preservation and landscape management element as a part of the master plan. Such a document would provide clear guidelines following the Secretary of the Interior’s Standards for the long-term rehabilitation, repair and maintenance of the historic landscape and its contributing features. It may also help guide the design and siting of any new development to minimize significant impacts and ensure compatibility with the historic character of Forest Lawn Memorial-Park–Hollywood Hills and the adjacent Griffith Park, itself a City of Los Angeles Historic-Cultural Monument.

Response to Comment No. 17-5

The comment’s suggestion to create a preservation and landscape management element as part of the Project is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. As explained in Section IV.D.1, Cultural Resources—Historic Resources, of the Draft EIR, the proposed Project would not have a significant adverse impact on the potentially eligible developed portions of the Memorial-Park, nor would it result in significant impacts with respect to any historic resource under CEQA. In addition, the proposed Project would not have a significant impact on the historic resources of the adjacent Griffith Park. The proposed Project’s impacts to historical resources would be less than significant without mitigation; however, Mitigation Measure D.1-1, set forth on page IV.D-20 of the Draft EIR, which would require documentation by an architectural historian of the two maintenance buildings prior to demolition, would further reduce the Project’s less-than-significant impacts. Further, it should be noted that the long-term maintenance of the Memorial-Park is provided for by the cemetery’s endowment care fund. Each interment property sold includes a contribution to the cemetery’s endowment care fund, which is placed in trust and designed to ensure a long-term source of income for the continued maintenance and upkeep of the cemetery, even when all of the interment spaces are sold. The State monitors cemetery endowment care funds and establishes minimum amounts of endowment care fund deposits required from each interment-space purchase. (See
California Health & Safety Code, Sec. 8738.) Forest Lawn collects over ten times more than the statutory minimums as an endowment care fund deposit.25

Comment No. 17-6

Thank you for the opportunity to comment on the Draft EIR for the Forest Lawn Memorial-Park–Hollywood Hills Master Plan. Please feel free to contact me at 213-430-4203 or afine@laconservancy.org should you have any questions.

Response to Comment No. 17-6

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

25 Forest Lawn Memorial-Park Association, November 2011.
Comment Letter No. 18

Bryce C. Lowery
President
Cahuenga Pass Property Owners Association
P.O. Box 1655
Hollywood, CA  90078

Comment No. 18-1

For over fifty years, the Cahuenga Pass Property Owners' Association (CPPOA) has represented the interests of owners and residents of both commercial and residential properties in the Hollywood Hills west of the 101 Freeway, north of Mulholland Drive, and south of Vineland Avenue. There are approximately 1500 homes and businesses in our hillside community. We submit these remarks to become part of the official record as well as part of the FEIR. Unless otherwise stated, please consider statements as well as questions to be in need of an appropriate response from the applicant. Our concerns and questions are as follows:

Response to Comment No. 18-1

The introductory comments are noted and have been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the environmental analysis in the Draft EIR are responded to below.

Comment No. 18-2

Cumulative loss of natural habitat our community

While the loss of habitat being proposed on site is alarming, the DEIR does little to assess it or the ecological loss associated with other projects in the vicinity. For instance, when considered in conjunction with the NBC Universal Evolution Plan (EIR Case No. ENV-2007-0254-EIR, Clearinghouse Number 2007071036), what are the overall ecological impacts of both projects on wildlife connectivity? What impact will these projects have on the overall ecosystem health of the Cahuenga Pass and our neighboring communities? Will efforts be made to guarantee that trees removed from the site for the demands of this project be planted in our local communities to reduce overall impacts on the local ecosystem?
Response to Comment No. 18-2

Potential Project impacts to habitat were evaluated in Section IV.C, Biological Resources, of the Draft EIR and in the General Biological Assessment, attached as Appendix C-1 to the Draft EIR. The vegetation and plant communities existing on the Project Site are described in detail on pages IV.C-13 through IV.C-18 of the Draft EIR, and potential vegetation community impacts associated with the proposed Project are described on pages IV.C-27 and IV.C-29 of the Draft EIR. In addition, Table IV.C-1, Vegetation Communities on the Project Site, on page IV.C-28 of the Draft EIR, lists each natural vegetation community on the Project Site, its acreage, the acreage impacted by the Project, and regulatory status designation, if any. Figure IV.C-4 on page IV.C-30 of the Draft EIR depicts the vegetation communities that would be affected by the proposed Project. Implementation of the proposed mitigation program described in the Draft EIR, including Mitigation Measures C-1 through C-6, Mitigation Measure C-8, and Mitigation Measures C-15 through C-17, would reduce the impacts to regulatory status vegetation communities to a level that is less than significant. (See page IV.C-29 of the Draft EIR.) The Draft EIR also describes the Project impacts to vegetation communities that are not considered regulatory status, which would be less than significant. (See page IV.C-29 of the Draft EIR.)

In addition, the Draft EIR evaluates potential impacts to animal species resulting from the vegetation community impacts described above. (See pages IV.C-29 through IV.C-37 of the Draft EIR.) Table IV.C-2, Regulatory Status Animal Species and Habitats, identifies the habitats on the Project Site that would be affected by the Project in which regulatory animal species with at least a moderate potential of occurrence may be present. (See pages IV.C-31 through IV.C-33 of the Draft EIR.)

The NBC Universal Evolution Plan is described on page III-29 of the Draft EIR, and its location in relation to the Project Site is depicted on Figure III-1, Related Projects Location Map, on page III-28 of the Draft EIR. The NBC Universal Evolution Plan is one of the related projects listed in the Draft EIR, which noted that the cumulative impact analysis presented in the Draft EIR is based on the list of related projects set forth on pages III-27 through III-30 of the Draft EIR. (See also page IV.C-43 of the Draft EIR with respect to cumulative biological resources impacts.) Pursuant to the CEQA Guidelines, the discussion of cumulative impacts “need not provide as great detail as is provided for the effects attributable to the project alone... [and] should be guided by the standards of practicality and reasonableness.” (CEQA Guidelines, Section 15130.)

As explained in the cumulative impacts discussion in the Biological Resources Section of the Draft EIR, although Griffith Park and other undeveloped lands are directly south, east and west of the Project Site, the other surrounding areas are highly urbanized and would be rarely utilized by wildlife other than those adapted to urban environments. The functional natural habitat within the Project Site is at the edge of the Hollywood
Hills/Griffith Park habitat complex, and the 70.42 acres of natural areas on the Project Site that would be impacted by the proposed Project comprise just 1.9 percent of the approximate 3,700-acre area of remnant natural habitat in the easternmost Santa Monica Mountains. Thus, the Project Site does not function as a “macro-corridor” for biological resources. This relatively small area that would be affected by the proposed Project (in comparison to the approximately 3,700-acre habitat block) would support a proportionally small amount of wildlife movement. Thus, barriers or impediments to movement in this small area would not preclude or eliminate animal movement on the north slope of the Santa Monica Mountains/Hollywood Hills, and impacts associated with wildlife movement would be less than significant. (See pages IV.C-39 through IV.C-40 of the Draft EIR.) Further, the 3,700-acre block of relatively natural habitat is, in itself, largely isolated, lacking any connective habitat to natural areas west of the Hollywood Freeway. Nor have corridors or critical pathways for terrestrial wildlife been identified. While birds and highly mobile animals may be able to traverse the Cahuenga Pass, the Project Site is not considered to be a major wildlife movement corridor, especially given the highly urbanized condition of its surroundings. (See page IV.C-43 of the Draft EIR.) As discussed in the Draft EIR, the proposed Project would not have a significant impact on biological resources (including vegetation communities, regulatory status animal or plant species, protected trees, or jurisdictional features) with implementation of the proposed mitigation program. Any impacts to biological resources similar to those impacted by the proposed Project as a result of the related projects would likely be subject to mitigation, resulting in impacts that are less than significant for those related projects as well. (See page IV.C-43 of the Draft EIR.) Thus, the Project’s potential cumulative impacts with respect to biological resources would be less than significant.

With respect to the portion of the comment addressing the removal of trees from the Project Site and planting in the local communities, pursuant to Mitigation Measure C-9, set forth on pages C-49 through C-51 of the Draft EIR, the Applicant must replace all coast live oak, western sycamore, and Southern California black walnut trees greater than or equal to 4 inches in diameter at breast height (DBH) removed in connection with the Project. Replacement trees would be planted on the Project Site or at approved off-site locations at a 2:1, 3:1, 5:1, 10:1, or 15:1 ratio, depending on the size of the removed tree (diameter at breast height) and whether it is in a CDFG jurisdictional area. Replacement trees may be planted in connection with the creation, restoration, and or enhancement of habitat required pursuant to Mitigation Measures C-2 through C-5 and C-8, which would further reduce impacts. Implementation of the proposed tree mitigation program would reduce the impacts to protected trees to a level that is less than significant. In addition, the number of replacement trees set forth in the proposed tree mitigation program would exceed the number of replacement trees required by the LAMC. (See pages IV.C-56 through IV.C-57 of the Draft EIR.) As noted above, the Project’s mitigation program includes measures to plant graded slopes on-site with native plant communities, including coast live oak and Southern California black walnut trees. (See page IV.C-44 of the Draft EIR.) For example, Mitigation Measure C-3 requires the creation of 8 acres of graded slopes on-site to be
planted with coast live oak and/or Southern California black walnut trees. (See page IV.C-46 of the Draft EIR.) Mitigation Measures C-4 and C-5, which require the on-site creation/restoration of riparian habitat, requires western sycamore to be used as a dominant element for planting within the mitigation areas. (See pages IV.C-46 through IV.C-47 of the Draft EIR.) Thus, while not all tree replacements may be feasible to be implemented on-site, a substantial number of tree replacements will be implemented on-site. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 18-3

Omission of Forest Lawn Memorial Park property in analysis

At one of the community presentations of this DEIR (March 8, 2011) displays indicated that an adjacent piece of property to the west of the proposed site, just north of Cahuenga Peak, is also owned by Forest Lawn Memorial Park. Why is this area omitted from the environmental analysis? Why are the impacts of developing this area not being considered in the overall plan for the Memorial Park?

Response to Comment No. 18-3

The adjacent property to the west of the Project Site that is also owned by the Forest Lawn Memorial-Park Association is described on page II-1, in the Project Description in the Draft EIR. The Draft EIR explains that there are approximately 140 acres of adjacent undeveloped property owned by Forest Lawn Memorial-Park Association on the west of the Project Site that are not a part of the proposed Project. This area is not part of the Project Site. As development is not proposed in this area as part of the Project, it was not included in the environmental analysis for the Project.

Comment No. 18-4

Alternative 4

We agree with the findings of The Santa Monica Mountains Conservancy and support their conclusion that Alternative 4 represents the best possible alternative for both our community and the residents of Los Angeles. In a time of increasing environmental degradation and concerns about sustainability, we feel that the environmentally superior alternative addresses both the need for burial space and the well being of our community.

Response to Comment No. 18-4

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. As the Draft EIR...
explains, in accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that Alternative 4: Reduced Project with Preservation of Drainages D, D1, F, F1, and H would be the Environmentally Superior Alternative. This Alternative would reduce more of the Project impacts than any of the other remaining alternatives. However, as the Draft EIR notes, this Alternative would meet several of the project objectives to a lesser degree than the proposed Project. (See page VI-62 of the Draft EIR.) The commenter is also referred to Section II, Corrections and Additions to the Draft EIR, of this Final EIR, for an updated description of Alternative 4.

**Comment No. 18-5**

As President of the Cahuenga Pass Property Owners’ Association, I thank you for your time. Our organization welcomes the opportunity to work with you and the applicant to create a socially, culturally, and ecologically sustainable vision for this site and our community.

**Response to Comment No. 18-5**

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment Letter No. 19

Bryce C. Lowery
President
Cahuenga Pass Property Owners Association
P.O. Box 1655
Hollywood, CA  90078

Comment No. 19-1

To clarify, our comment letter dated April 11, 2011, is based on a draft Santa Monica Conservancy letter, discussed at their March 28th Board of Directors Meeting, for the Forest Lawn Memorial Park - Hollywood Hills DEIR. That letter is contained here in, in its entirety.

Thank you for your attention to this amendment to our comments.

Attached draft Santa Monica Conservancy Letter:

The Santa Monica Mountains Conservancy (Conservancy) is concerned about the proposed elimination of natural resources in conjunction with build-out of the Forest Lawn Memorial Park - Hollywood Hills Master Plan. The cemetery’s location adjacent to Griffith Park provides a serene natural setting apt for such a use, however the proposed expansion of almost 200,000 interment sites sacrifices key features of cemetery’s bucolic environment for only marginal increases in the number of interment spaces. A modest reduction in the size of the expansion would preserve the site’s most valuable natural resources while still permitting Forest Lawn to greatly expand its operations over the next half century. The Conservancy urges a greater focus on avoidance-rather than mitigation-of impacts to the site’s unique riparian habitats and stronger protection of native habitat areas.

With impact avoidance as an overarching objective, the Conservancy offers the following specific comments on the proposed project and Draft Environmental Impact Report (DEIR):

On-site Riparian Habitat is a Unique Resource in Eastern Santa Monica Mountains

The on-site resources at Forest Lawn Memorial Park constitute some of the best riparian woodland habitat anywhere in the eastern Santa Monica Mountains. The Griffith Park-adjacent habitat is ecologically intact, high-functioning riparian habitat with nearly year-round surface flow. The subject property is situated on the cooler, wetter north-facing slopes of the Santa Monica Mountains, making it ecologically distinct from most of the remainder of the Griffith Park habitat block. Furthermore, Sennett Creek is not channelized for its entire length, all the way to its confluence with the Los Angeles River. No other
Santa Monica Mountains creek is so directly ecologically connected to the Los Angeles River, making Sennett Creek and its tributaries high priorities for preservation. As noted in the DEIR, riparian areas on the subject property serve dual functions. Their preservation is critical for both resident amphibian populations and mobile terrestrial mammals and reptiles that require access to lower reaches during the dry season. Sennett Creek is unique in the Griffith Park core habitat block in being able to consistently provide these ecosystem resources even in drought years. Therefore the quality of habitat connections between lower Sennett Creek and core upland habitat is one of the two most important considerations in assessing biological resource impacts of the proposed project.

**Rarity of On-site Resources Necessitates Greater Impact Avoidance**

As noted above, the Sennett Creek drainage, and to a lesser extent Drainage L, are rare resources within the Griffith Park core habitat block and critical to the capacity of the overall ecosystem. Given these considerations, impact avoidance must be the primary strategy in addressing impacts to biological resources. As proposed, the project does not adequately utilize avoidance of impacts to riparian resources as an alternative to mitigation.

Furthermore, just a slight reduction in project scale would yield tremendous riparian benefits. The last five percent of the interment spaces is responsible for almost fifty percent of the riparian impacts. A small reduction in the context of the total expansion would produce substantial habitat preservation gains.

Lower Royce Canyon is the most important high-functioning riparian forest habitat in proximity to Griffith Park, with superior resource value than most similar habitats in the park. The Western Sycamore-Coast Live Oak woodland provides a lush, full canopy over Sennett Creek tributaries that would be impossible to replicate elsewhere. High-value habitats are more than the sum of their parts and can’t be accounted for in terms of acres and number of trees. Mitigation is inappropriate when resource loss can be avoided so easily.

**Habitat Connection to Los Angeles River Important to Revitalization**

The interface between Sennett Creek and the Los Angeles River is the only direct riparian connection between the river and upland natural habitat areas. In the context of river revitalization, its importance cannot be overstated. While the proposed project does not directly impact the interface itself, it would make the upland habitat connections more tenuous by reducing the number of surface-running tributaries to Sennett Creek. The long term function of this habitat connection is directly dependent on the number of tributaries left intact. As noted in the DEIR, riparian corridors serve as primary wildlife movement corridors. Therefore Sennett Creek would function as the principal connection to future and existing habitat along a naturalized Los Angeles River.
While some degree of riparian impact is unavoidable given the nature of the project, a key objective must be to retain a connected, functional riparian ecosystem on-site. This is not just a function of the number of acres of jurisdictional impacts, but instead requires a coordinated approach to habitat preservation, creation, restoration, and enhancement that is integrated with the design of the proposed project. Ensuring the functionality of the on-site riparian ecosystem will avert cumulative impacts to Griffith Park resources dependent on habitat connectivity outside the park, particularly mobile animals.

DEIR Inaccurately Describes Habitat Connectivity in Cahuenga Pass

The DEIR asserts that Griffith Park is a biologically isolated island of remnant natural habitat:

A review of current aerial photography and knowledge of this area generally suggests that this “island” of relatively natural habitat is, in itself, largely isolated. It has no connective habitat to natural areas west of the Hollywood Freeway. No discernable corridors or critical pathways for terrestrial wildlife have been identified.

The Conservancy strongly disputes the notion that Griffith Park is disconnected from natural areas to the west. To the contrary, the Conservancy and Mountains Recreation and Conservation Authority (MRCA) own both large habitat blocks and smaller connective parcels to facilitate wildlife movement throughout the eastern Santa Monica Mountains generally and across the Cahuenga Pass specifically. Where else could the occasional mountain lion sighted in Griffith Park come from?

Most assuredly, Cahuenga Pass is a partial barrier to some terrestrial wildlife movement—one that must be remedied—but this does not justify the DEIR’s conclusion that no wildlife movement takes place. Studies of movement patterns through this corridor are ongoing to fill this information void; however in the interim it must be assumed that biological exchange occurs regularly, even under existing constrained conditions. If anything, the tenuousness of the connection would warrant greater levels of mitigation rather than less. The remaining wildlife passages through Cahuenga Pass are the target of multiple public and private conservation efforts. The recent acquisition of Cahuenga Peak furthers these aims.

Figure IV.C-3 is a deceptive portrayal of the biological setting by not including all public protected open space in the project vicinity. Terrestrial wildlife movement does not require literally contiguous parcels of habitat, but instead habitat blocks of all sizes with some degree of permeability in between. The FEIR must revise this figure to reflect all public protected open space in the map view. Currently the figure does not even include contiguous habitat in the vicinity of Lake Hollywood. Conservancy staff will provide parkland GIS layers if requested.
DEIR Understates Resource Value of Habitat Area to be Lost

The DEIR calculates the habitat loss to occur under the proposed project as a percentage of the greater Griffith Park core habitat area to conclude that a 1.9 percent loss is less than significant. To the contrary, any single project that results in a 1.9 percent habitat loss is absolutely significant, particularly in the context of an already stressed ecosystem. This constitutes a far greater rate of resource loss than occurs in almost any other biological unit in Los Angeles County—and this from only one project. In the Hollywood Hills and Griffith Park ecosystems, the Conservancy asserts that any loss of more than five acres of any habitat type is a significant impact.

Furthermore, the habitat loss would occur in vegetation communities that comprise the most ecologically significant north slope habitat in the Griffith Park core habitat block. As a large fraction of this north slope riparian woodland and other communities, the proposed resource loss is significant. The FEIR must identify what percentage of riparian woodland and other sensitive communities in the Griffith Park core habitat area would be impacted under the proposed project and each alternative. The Conservancy believes these fractions would exceed five percent for multiple communities.

Second only to connectivity, the size of the core habitat area is the greatest issue facing the Griffith Park habitat block. As the 2007 fire demonstrated, a single stochastic disturbance can affect the entire area. Habitat size is the primary determinant of an ecosystem’s resiliency against this kind of event. Unaffected areas provide critical source flora and fauna for recolonization after natural or manmade disturbances.

Most of the riparian mitigation will occur outside the Santa Monica Mountains in the upper Los Angeles River watershed. Thus this off-site mitigation does not address the reduction in habitat area within the Griffith Park core habitat area, which must be mitigated as a separate and distinct impact. To compensate for significant diminution of the Griffith Park core habitat area, additional mitigation must occur within or in close proximity to the habitat block. This mitigation can only consist of the permanent preservation of private land within the Griffith Park core habitat area or Cahuenga Pass wildlife corridor. The FEIR should offer a voluntary mitigation measure to provide a fund for the MRCA to acquire approximately 20 acres in either the movement corridor or unprotected riparian woodland habitat within the block. A rough estimate for the value of such a fund can be computed using the cost of the recent Cahuenga Peak acquisition, which was $87,000 per acre.

On-Site Resources Must be Better Protected

The proposed habitat loss is not directly mitigated to reduce these impacts. The Conservancy asserts that minimizing on-site impacts to sensitive communities is the best course of action to reduce these impacts to be less than significant. Remaining resources
on-site must be afforded the highest possible form of protection. Recordation of conservation easements in favor of the MRCA over remaining habitat, revegetated slopes, and all riparian corridors on the subject property must be a condition of approval to ensure enforceable protection in perpetuity. The Conservancy understands that the DWP easement is preexisting and would be superior to any conservation easement. The Conservancy would support any subsequent fee simple transfer of land to the City of Los Angeles Department of Recreation and Parks with an overlying conservation easement.

**Fencing Must be Permeable to Mammals**

The DEIR notes that existing fencing on the property’s perimeter is somewhat permeable to wildlife. However, the fencing’s permeability is currently left to chance and the project contains no assurances that future extensions or repairs will also be permeable to wildlife. To achieve a less than significant impact to wildlife movement, a voluntary mitigation measure should explicitly state that all new or renovated fencing greater than 1,500 feet from Forest Lawn Drive will be passable to wildlife such that mammals can access the lower reaches of Sennett Creek during the dry months.

**Lighting Impacts are Adequately Addressed**

The potential impact from both direct and ambient lighting is an important consideration for biological resources. The Conservancy believes that the standard of preventing artificial illumination of natural areas, as identified in the DEIR, is sufficient. Sennett Creek and its tributaries must be included in the definition of natural areas for this purpose.

**Impact of Brush Clearance Not Disclosed**

The DEIR references the fact that some natural areas will be brushed and asserts that this impact will be less than significant. However, the location and extent of brush clearance is not disclosed, therefore the impact cannot be effectively evaluated. The FEIR must define what brush clearing for aesthetic purposes means and show the extent of its reach into natural areas. Additionally, the FEIR must disclose whether any of the brush clearance will occur on neighboring parcels or in Griffith Park. Brush clearance areas must be evaluated by quantifying the impact by affected habitat type.

**Cumulative Impacts are Not Assessed Correctly**

The DEIR uses a peculiar standard for assessing cumulative impacts to biological resources. It asserts that because the project’s impacts are mitigated to a level of insignificance and any other potential project would likewise be mitigated to a level of insignificance, there would be no potential for cumulative impacts. However, the distinction
III. Responses to Comments

between a cumulative impact and a direct impact is that a cumulative impact occurs when multiple direct impacts that would otherwise be less than significant are in fact significant when considered together. A project with less than significant impacts due to off-site mitigation, as is the case with the proposed project, could very well contribute to cumulative impacts in the vicinity of the project despite that mitigation.

The FEIR must reevaluate the cumulative impacts of the proposed project in the context of an ever-shrinking core habitat area and ever-diminishing connectivity to the rest of the Santa Monica Mountains. Only then can a finding about significance be reached. It is very possible that additional mitigation may be required to address specific potential cumulative impacts to wildlife movement, habitat area, and ecosystem resilience. The habitat acquisition fund proposed above would address this potential for cumulative impacts.

**Alternative 4 Represents Best Balance of Resource Protection and Cemetery Use**

The Conservancy supports the identified environmentally superior alternative: Alternative 4. This alternative strikes the best balance between expanding the cemetery and preserving the highest-value riparian resources. As outlined above, the on-site riparian resources are critical to the overall health of the Griffith Park core habitat area, warranting a sharp focus on impact avoidance. Alternative 4 successfully preserves multiple Sennett Creek tributaries and their associated riparian woodland habitat without unduly reducing the number of interment sites possible on the subject property. The alternative provides for 188,487 interment sites, instead of the proposed 199,614, while impacting 3.79 fewer acres of jurisdictional streambed than the proposed project. Only Alternative 5 would avoid further riparian impacts, but at the cost of a substantial reduction in interment sites.

Although Alternative 4 still results in some riparian resource loss, the extent of this loss is much reduced in comparison to the proposed project and would spare the most sensitive on-site resources. The MRCA has entered into an In-Lieu Fee Agreement in accordance with mitigation measure C-8 providing for the replacement of lost riparian resources through creation, restoration, and enhancement activities off-site, pending approval from the U.S. Army Corps of Engineers and California Department of Fish and Game. Mitigation will be determined based on a required mitigation ratio and what jurisdictional acreage is ultimately impacted by the proposed project.

The Conservancy was not notified of the release of this DEIR. Please send all future notices and other project documents to the letterhead address. If you have any questions, please contact Paul Edelman of our staff at (310) 589-3200 ext. 128.
Response to Comment No. 19-1

The draft of the Santa Monica Mountains Conservancy letter provided in this letter from the Cahuenga Pass Property Owners Association was superseded by the final version of the letter from the Santa Monica Mountains Conservancy that was submitted by the Santa Monica Mountains Conservancy and is included in this Final EIR as Comment Letter No. 6. Responses to Comment Letter No. 6 are above. The issues raised in the draft letter provided in this comment are substantially the same as the issues raised in the final letter included as Comment Letter No. 6. Please refer to Responses to Comment Letter No. 6. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment Letter No. 20

Roy P. Disney, Chairman
Daniel Savage, President
Richard Bogy, Vice President
Deuk Perrin, Vice President
Terry Davis, Secretary
Krista Michaels, Treasurer
Communities United for Smart Growth

Comment No. 20-1

The Board of Directors of Communities United for Smart Growth thanks you and the City of Los Angeles for the opportunity to respond in writing to the Draft Environmental Impact Report for the proposed new project at Forest Lawn Memorial Park. Communities United for Smart Growth [a 501(c)(3) public charity] is comprised of local residents and business leaders from the communities that surround the Universal Studios property, which include but are not limited to Toluca Lake, Studio City, the Cahuenga Pass, Hollywood Knolls and other Hollywood Hills associations, and representatives from Burbank. Prior to CUSG’s nonprofit status, the group was originally created as the Working Group in 2006 from more than 14 highly respected community associations, chambers of commerce, business groups, and four neighborhood councils. CUSG’s mission is to preserve the environment and quality of life and to educate the public on these issues within the City of Los Angeles, as well as to envision and help create a true 21st century development model that will chart a better course for development in the decades to come.

Based on the information presented in the DEIR, we have the following comments and questions. We reserve the right to make additional comments in the future if our understanding of the facts presented changes or as new information becomes available.

Response to Comment No. 20-1

The introductory comments are noted and have been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the environmental analysis in the Draft EIR are responded to below.

Comment No. 20-2

Cumulative Construction Impacts—We are concerned that while the construction process, especially the hauling away of dirt, might not have a negative impact on the immediate neighborhoods, it could when combined with other projects. What steps are being taken to coordinate dirt removal and other construction activities using public roads with other
known projects such as the Headworks Reservoir, the MTA Lankershim project and the NBC Universal Evolution project and any other currently unknown project in the future?

**Response to Comment No. 20-2**

The comment suggests that while the Project construction might not have a negative impact on the immediate neighborhoods, there could be cumulative impacts when combined with other projects. As noted in Section IV.J, Traffic, Circulation and Parking, pages IV.J-9 through IV.J-10 of the Draft EIR, given the size and relative isolation of the Project Site, as well as the Project Site’s proximity to the freeway, the combination of haul truck and employee traffic is not anticipated to cause any adverse impacts to intersection capacity, street segment capacity, freeway capacity, neighborhood intrusion, or parking during the construction period. While the sites receiving the removed soils have not been identified at this time, all haul trucks would use the SR-134 Freeway and access the Project Site via the on- and off-ramps for Forest Lawn Drive, and a project design feature has been included to this effect as part of the Project. (See Subsection IV.J, Traffic and Circulation, of Section II, Corrections and Additions, of this Final EIR.) The haul route would not pass through a residential community, and no schools are located along this route. Thus, construction-related traffic impacts to the surrounding land uses would be less than significant. Construction-related traffic impacts would be less than significant, and mitigation is not required. (See pages IV.J-9 through IV.J-10 of the Draft EIR.)

Further, as noted on Page IV.J-9 of the Draft EIR, LADOT requires implementation of worksite traffic control plans to ensure that construction-related effects are minimized. In addition, all Project construction activities would be performed in accordance with all applicable laws, codes, and practices, including the Department of Building and Safety’s “Good Neighbor Construction Practices,” as applicable to minimize construction-related impacts on the surrounding community. As the Draft EIR explains, these practices include parking construction vehicles on-site to prevent congestion, using flag persons and warning signs during haul truck entry/exit from the construction site, avoiding street closures during peak traffic hours, properly filling concrete trucks during deliveries, eliminating unnecessary noise (e.g., music) during construction, cleaning construction debris from public rights-of-way, eliminating conflicts with City trash pick-up schedules/operations, and obtaining permits when storing building materials in the public right-of-way. (See page IV.J-9 of the Draft EIR.) Further, Project-related hauling of excavated soil from the Project Site is anticipated to occur primarily during the late evening to early morning period, and would generally not occur during the A.M. or P.M. peak-hour periods. These practices will further minimize construction-related traffic impacts on the surrounding community and roadways. As set forth in Section II, Corrections and Additions, of this Final EIR, a project design feature has been included as part of the Project that will limit hauling during the peak traffic hours and provides for the hauling of excavated soil from the Project site to occur primarily at night.
Accordingly, the Project’s incremental contribution to the cumulative impact on traffic would not result in a significant cumulative effect. Pursuant to the CEQA Guidelines, “cumulative impacts” refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. (CEQA Guidelines, Section 15355.) An EIR must discuss cumulative impacts of a project when the project’s incremental effect is cumulatively considerable (i.e., significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects). (CEQA Guidelines Sections 15130 and 15065(a)(3).) The incremental effect of the Project, if any, would not be cumulatively considerable. In addition, other development projects would be evaluated on a case-by-case basis and mitigation measures would be implemented individually in coordination with the City. The Project would not result in a significant impact related to accessibility, including emergency access. With respect to each of these areas, the design of each related development project would be evaluated individually in coordination with City, the Fire Department, and the Police Department to minimize any potential impacts. Overall the Project’s cumulative traffic and circulation impacts would be less than significant. (See page IV.J-14 of the Draft EIR.)

Comment No. 20-3

Sennet Creek—The claim that “Sennet Creek has no direct ecological connection with the Los Angeles River Flood Control Channel as it once did in the past.” (III-6) is misleading. It either has no direct ecological connection at all or it doesn’t have the same degree of ecological connection that it did in the past. Sennet Creek and, in fact, all the other drainage on the Project, has a very real connection to the Los Angeles River and, ultimately, the ocean. All but 50 acres of the Project’s 930 hydrological drainage acres goes straight into the Los Angeles River. 700 acres drain into Sennet Creek, which flows into the River.

Response to Comment No. 20-3

The Draft EIR discusses the relationship between Sennett Creek and the Los Angeles River Flood Control Channel in terms of hydrological connection and ecological connection. With respect to hydrological connectivity, as the Draft EIR explains in Section IV.G, Hydrology/Water Quality, Sennett Creek enters the Forest Lawn Memorial-Park property in the southern portion of the Project Site where stormwater flows from the north-facing slopes of the Santa Monica Mountains converge into a more distinct channel and flow onto the Project Site. Sennett Creek ends at the northern portion of the Project Site, where it enters three existing 60-inch corrugated metal pipes, which flow north under Forest Lawn Drive into the Los Angeles River Flood Control Channel. (See page IV.G-3 of the Draft EIR.) As explained in the Draft EIR and noted in the comment, all stormwater in the approximately 700-acre drainage area (referred to as Drainage Area “B”) that includes a majority of the Project Site and several of the adjacent north-facing slopes within Griffith
Park flows into the on-site Sennett Creek and outlets into the Los Angeles River Flood Control Channel through the existing pipes under Forest Lawn Drive. (See page IV.G-3 of the Draft EIR.) Also, as explained in the Draft EIR, all stormwater in a separate approximately 180-acre drainage area in the southwest portion of the Project Site, adjacent to the south side of Forest Lawn Drive (referred to as Drainage Area “A”), flows into an unnamed, northwest-trending natural drainage channel (defined as “Drainage L” in the Draft EIR) that eventually drains into the Los Angeles River Flood Control Channel through existing 48-inch reinforced concrete pipe storm drains.

With respect to ecological connectivity, as the Draft EIR explains on page IV.C-20, Sennett Creek originally was comprised of oak/sycamore dominated riparian woodland that stretched from the Los Angeles River upward into what is now called Royce’s Canyon in Griffith Park. Prior to 1940, Sennett Creek was one of many ecologically functional tributaries to the Los Angeles River. With the channelization of the Los Angeles River, Sennett Creek has been truncated. Portions of the creek have been affected by historic development of the Project Site as well; however, those previously affected sections have been largely restored and are now comprised of mixed willow riparian scrub intermixed with newly established sycamores, cottonwoods, and coast live oaks. (See Section IV.C, Biological Resources, of the Draft EIR, page IV.C-20.) Currently, Sennett Creek provides habitat and cover for riparian-dwelling and stream-dependent organisms, but it has no direct ecological connection with the Los Angeles River, as it once did. As such, it provides a water source and a movement area for animals like mule deer, long-tailed weasel (Mustela frenata), bobcat (Lynx rufus) and northern raccoon; however, its functions, with regard to connectivity into greater Los Angeles River–associated habitats, have been largely eliminated due to the current condition of the River and the extensive conversion of habitats throughout the San Fernando Valley. Moreover, regulatory status organisms that once might have used the river to access other tributary stream systems (such as anadromous fish species, California red-legged frog [Rana draytonii], and regulatory status small mammals like Los Angeles pocket mouse [Perognathus longimembris brevinasus] and perhaps kangaroo rats [Dipodomys spp.]) now are in decline or absent. Therefore, while organisms now present in the area most likely do venture into Sennett Creek for water and for cover, they do not do so in a manner consistent with the actual role of wildlife corridors. (See page IV.C-22 of the Draft EIR.)

Comment No. 20-4

Herbicides/Pesticides—The DEIR includes mitigation plans to restore the natural habitat to different sections of their property. However, there is no mention at all as to what types of herbicides, pesticides or chemical fertilizers are currently being used that affect the existing and future habitat, not to mention that all of the above mentioned chemicals are being flushed into the River. What types of herbicides, pesticides and fertilizers does Forest Lawn presently use and what is their impact on the local ecosystem?
Response to Comment No. 20-4

The comment suggests that there is not mention in the Draft EIR as to the types of herbicides, pesticides, or chemical fertilizers currently used on the Project Site that affect natural habitat and that such chemicals are being “flushed into the River.” Pesticide use on the Project Site is addressed in the Draft EIR, which notes in Section IV.F, Hazardous Materials/Risk of Upset, page IV.F-10, that Forest Lawn employs pest control contractors to apply pesticides around buildings on a monthly basis. The pest control contractors are licensed by the State of California Department of Health Services, and the contractor stores its landscaping supplies off-site. The Draft EIR also notes that Forest Lawn applies a pre-emergent herbicide as part of its lawn maintenance and that it is stored in the maintenance yard on the Project Site. (See page IV.F-10 of the Draft EIR.) As explained on page IV.G-24 in Section IV.G, Hydrology/Water Quality, of the Draft EIR, the anticipated quality of effluent from the Project Site would not contribute loads or concentrations of pollutants of concern that would be expected to cause or contribute to a violation of water quality standards. Potential impacts with respect to water quality would be less than significant.

With respect to potential Project impacts related to pesticide use, the Draft EIR explains that for common area landscaping in the developed areas of the Project Site, an integrated pest management program would be incorporated. The goal of an integrated pest management program is to keep pest levels at or below threshold levels, reducing risk and damage from pest presence, while reducing the risk from the pest control methods used. Integrated pest management programs achieve these goals through the use of low-risk management options by emphasizing use of natural biological methods and the appropriate use of selective pesticides. Integrated pest management programs also incorporate environmental considerations by implementing procedures that minimize intrusion and alteration of biodiversity in ecosystems. Further, all pesticides would be handled, stored, and applied in accordance with applicable regulations and all manufacturer recommendations. In accordance with these requirements, the proposed Project would include source control measures such as education programs for employees in the proper application, storage, and disposal of pesticides that will be used at the Project Site. Therefore, as the Draft EIR explains, implementation of the integrated pest management plan and rodent control practices in accordance with the principles described above and the handling of all pesticides in accordance with all applicable regulations and recommendations would ensure the proposed Project would not result in a significant impact upon the environment. (See pages IV.F-20 through IV.F-21 of the Draft EIR.)

Comment No. 20-5

Water Runoff—The Project has 544,303 square feet of structural floor area. Where is all the runoff from the roofs of these buildings going? There is no mention of it being captured anywhere and being reused. Just one inch of rain will produce over 326 million gallons of water available for capture. Southern California is facing a serious water shortage
situation, despite recent rains. What efforts are being made to recapture rainwater for future use?

Response to Comment No. 20-5

The comment states that the Project has 544,303 square feet of structural floor area and asks where the runoff from the roofs of these buildings is going. To clarify, as explained in the Draft EIR, Section II, Project Description, on page II-6, the Project Site is currently developed with approximately 544,303 square feet of structural floor area, which includes approximately 98,679 square feet of occupied floor area (administration/mortuary/flower shop, churches, etc.) and approximately 445,624 square feet of structures, including garden areas, which do not count as floor area under the Los Angeles Municipal Code. Accordingly, most of the referenced 544,303 square feet of existing development is interment property such as burial gardens, which do not include roofs. Runoff from existing roofs enters the storm drain system. As cemetery development occurs, new structures comply with stormwater treatment requirements, and runoff retention measures are installed as required. The types of measures accepted by the City change over time. However, a recent interim project on the Project Site, for example, included infiltration planter areas that capture initial rain event flows and recharge the water into the ground.

Comment No. 20-6

Local Mitigation—Forest Lawn has, in the past, done mitigation due to its intrusion in a wildlife corridor. The area along the River is considered sacrosanct, and that includes the banks under the canopies of the trees which are next to the River. The required mitigation has been done as far upstream as Agoura. If it is determined that mitigation is required, what assurances can be made that such measures are enacted locally, rather than miles away?

Response to Comment No. 20-6

The comment expresses concern about the location of Project mitigation measures in relation to the Los Angeles River and specifically asks for assurances that mitigation measures for the Project, if required, are enacted locally, rather than miles away. As noted in the Draft EIR, Section IV.C, Biological Resources, the Project is subject to the jurisdiction of various resource agencies that regulate the Los Angeles River and associated tributaries, and, accordingly, in addition to the entitlements requested from the City of Los Angeles, the Project includes permit requests from the United States Army Corps of Engineers (Corps), the California Regional Water Quality Control Board (RWQCB), and the California Department of Fish and Game (CDFG). Copies of the applications filed with these resource agencies are attached within Appendix C to the Draft EIR. As the comment notes, and as explained in the Draft EIR, Project-related impacts to areas within the jurisdiction of the Corps, RWQCB, and CDFG will require compensatory mitigation to offset
the impacts. Mitigation Measures C-1 through C-17 are described in the Draft EIR, Section IV.C.5. The Corps, RWQCB, and CDFG do not typically approve out of watershed mitigation measures, and Forest Lawn has entered into an agreement with the Mountains Recreation and Conservation Authority for the provision of off-site mitigation at potential locations identified in the Los Angeles River watershed within Long Canyon, Browns Canyon, Lopez Canyon, and Wilson Canyon. Furthermore, the Project includes substantial on-site mitigation as set forth in the Draft EIR (see, for example, Mitigation Measures C-1 through C-5), which guarantees that some, if not all of the Project mitigation measures will be implemented locally. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 20-7

Tree Removal—The proposed Project has the potential to remove 835 protected trees on the Project Site, specifically 632 coast live oak trees, 59 western sycamore trees, and 144 Southern California black walnut trees. The trees proposed for removal provide crucial habitat and food source for a number of species. Further it has been indicated that those removed trees might be replaced at ratios of 2-to-1 upwards to 9-to-1, based on various factors, such as age, height, and trunk measurements of the removed tree.

It has been indicated that replacement of the removed oak trees will be overseen by the Santa Monica Mountain Conservancy and the removed trees will be replaced “regionally” and in those areas where the SMMC has a sphere of influence. The description of “regionally” is nebulous at best and completely unacceptable.

Response to Comment No. 20-7

Pursuant to Mitigation Measure C-9, set forth on pages C-49 through C-51 of the Draft EIR, the Applicant must replace all coast live oak, western sycamore, and Southern California black walnut trees greater than or equal to 4 inches in diameter at breast height (DBH) removed in connection with the Project. Replacement trees would be planted on the Project Site or at approved off-site locations at a 2:1, 3:1, 5:1, 10:1, or 15:1 ratio, depending on the size of the removed tree (diameter at breast height) and whether it is in a CDFG jurisdictional area. Replacement trees may be planted in connection with the creation, restoration, and or enhancement of habitat required pursuant to Mitigation Measures C-2 through C-5 and C-8, which would further reduce impacts. Implementation of the proposed tree mitigation program would reduce the impacts to protected trees to a level that is less than significant. In addition, the number of replacement trees set forth in the proposed tree mitigation program would exceed the number of replacement trees required by the LAMC. (See pages IV.C-56 through IV.C-57 of the Draft EIR.) As noted above, the Project’s mitigation program includes measures to plant graded slopes on-site with native plant communities, including coast live oak and Southern California black walnut trees. (See page IV.C-44 of the Draft EIR.) For example, Mitigation Measure C-3
requires the creation of 8 acres of graded slopes on-site to be planted with coast live oak and/or Southern California black walnut trees. (See page IV.C-46 of the Draft EIR.) Mitigation Measures C-4 and C-5, which require the on-site creation/restoration of riparian habitat, requires western sycamore to be used as a dominant element for planting within the mitigation areas. (See pages IV.C-46 through IV.C-47 of the Draft EIR.) Tree replacements will occur within designated on-site mitigation areas, as described above, and off-site mitigation areas within the Los Angeles River watershed, as approved by the applicable agencies. Forest Lawn has entered into an agreement with the Mountains Recreation and Conservation Authority (a joint powers agency of the Santa Monica Mountains Conservancy) for the provision of off-site mitigation at potential locations identified in the Los Angeles River watershed within Long Canyon, Browns Canyon, Lopez Canyon, and Wilson Canyon. The Mountains Recreation and Conservation Authority would oversee the planting of replacement trees in connection with the off-site mitigation areas that are subject to the agreement with Forest Lawn and all applicable agency approvals. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 20-8**

We believe that no native oak tree should be removed unless it presents an immediate and obvious hazard to Forest Lawn visitors. We further believe that if any native oak tree is removed that it must be replaced at a ratio of 9-to-1, and the replacement oak trees must be planted in areas close enough to the original (removed) tree site so as to provide habitat and food source to the same wildlife that utilized the original (removed) tree.

**Response to Comment No. 20-8**

The comment suggests that no native oak tree should be removed unless it presents an immediate and obvious hazard to Forest Lawn visitors, and that if any native oak tree is removed, it must be replaced at a 9:1 ratio with replacement trees located in close enough proximity to removed oak trees as to provide “habitat and food source” to the wildlife affected by oak tree removal. To clarify, and as explained further in the Draft EIR and in Response to Comment No. 20-7, pursuant to Mitigation Measure C-9, set forth on pages C-49 through C-51 of the Draft EIR, replacement trees would be planted on the Project Site or at approved off-site locations at a 2:1, 3:1, 5:1, 10:1, or 15:1 ratio, depending on the size of the removed tree (diameter at breast height) and whether it is in a CDFG jurisdictional area. The Project Site will be graded over approximately 15 years in three phases. Grading operations will involve changes in topography and slopes on the site in a manner that would not allow the replacement of trees into areas that have been reconfigured. Furthermore, actual construction and infrastructure installation (i.e., water lines) may not become available for several years in any given area. Therefore, it is not feasible or possible to reintroduce oak trees into areas from which they were removed and re-graded. Pursuant to the Project mitigation measures, oak trees would be planted on
re-created slopes and in restoration areas on-site. The City has standard mitigation ratios that apply to oak tree removals and will be applied to this project, and, as noted in the Draft EIR, the number of replacement trees set forth in the proposed tree mitigation program for the Project would exceed the number of replacement trees required by the Los Angeles Municipal Code. (See page IV.C-57 of the Draft EIR.) Please also refer to Response to Comment No. 20-7 for additional information regarding oak tree replacement. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 20-9**

The Board thanks you for your time and attention to this response.

**Response to Comment No. 20-9**

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment Letter No. 21

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

Comment No. 21-1 (Correspondence regarding Draft EIR Public Review Period)

March 10 Written Correspondence: Friends of Griffith Park asks that the comment period for above [sic] mentioned Draft Environmental Impact Report (DEIR) be extended by 60 days for these reasons:

1. The DEIR is so long that one could not be expected to read it all and formulate comments within the short 45-day period.

2. Public awareness of the EIR has not been adequate. No departments or entities have done outreach, including the Department of Recreation and Parks and Council District 4.

3. Various homeowners associations and NCs can not be expected to put this important item on their agendas for both their respective committee meetings and their full board meetings in such a short time frame.

Friends of Griffith Park would like to comment on the DEIR. However, at this date can simply not do so as completely as we would like with a deadline, as it currently stands, of March 28th. Please extend the comment period until May 30th in the best interest of the public.

Email 1: Friends of Griffith Park previously emailed a letter requesting extension of 60 days for response for Forest Lawn DEIR (attached letter of March 10th). Although we have received no direct response to our letter from you, I have heard from other sources that only a 15 day extension was granted.

Frankly, this is of little help. We persist in our request for a 60 days extension.

Attachment to Email: This attachment is a copy of the March 10 written correspondence provided above.

Response from City: The procedures and time period for public review of a Draft Environmental Impact Report are set by state law in Sections 15087 and 15105 of the
Guidelines for California Environmental Quality Act (California Code of Regulations, Title 14, Chapter 3). Specifically, Section 15105(a) states that “The public review period for a draft EIR should not be less than 30 days nor longer than 60 days except in unusual circumstances.”

Following this directive, the City of Los Angeles Department of City Planning typically sets a public review period of 45 days for Draft EIRs, the midpoint between the minimum and maximum review period. The public review period for the Forest Lawn Memorial Park–Hollywood Hills Master Plan project’s Draft EIR was originally set at the standard 45 days, but in response to letters received from community groups and the City Council office, this period was extended by 15 days as a courtesy. There were no unusual circumstances identified to warrant an extension beyond the 60-day maximum set by state law in Section 15105(a) of the CEQA Guidelines.

A revised Notice of Preparation will be distributed shortly reflecting the new public comment due date of Wednesday, April 13. We look forward to seeing any comments you may have regarding the analysis presented in the Draft EIR.

Email 2: Well... we do know it has been common in the past. Cite NBC and Autry for two. Thank you anyway.

Response to Comment No. 21-1

The specific procedures and time period for public review of a Draft Environmental Impact Report are mandated by state law in Sections 15087 and 15105 of the CEQA Guidelines. Specifically, Section 15105(a) states: “The public review period for a draft EIR should not be less than 30 days nor longer than 60 days except in unusual circumstances.” Consistent with the requirements of CEQA, the Draft EIR was submitted to the State Clearinghouse, Office of Planning and Research, and was originally circulated for public review for a 45-day period. This 45-day comment period began on February 11, 2011. In response to requests to extend the review period, on March 25, 2011, the City of Los Angeles extended the comment period by an additional 15 days to April 13, 2011. Thus, the Draft EIR was circulated for a 60-day public review period, which exceeds the 45-day public review period required by CEQA Guidelines Section 15105 when a Draft EIR is submitted to the State Clearinghouse for review by State agencies. There were no unusual circumstances identified by the City to warrant an extension beyond the 60-day maximum set by state law in Section 15105(a) of the CEQA Guidelines.

In addition, as explained on page I-2 of the Draft EIR, comments from identified responsible and trustee agencies, as well as interested parties on the scope of the Draft EIR, were solicited through a Notice of Preparation (NOP) process. The NOP for the Draft EIR was circulated for a minimum 30-day review period starting on November 13, 2008,
and ending on December 15, 2008. In addition, a public scoping meeting was held on November 19, 2008. The public scoping meeting provided the public with the opportunity to receive information regarding the Project and to provide input regarding issues to be addressed in the Draft EIR. A copy of the NOP and responses to the NOP are provided in Appendix A to the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment Letter No. 22

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

Comment No. 22-1

SUMMARY:

Friends of Griffith Park is a charitable non-profit organization focused on advocacy, service, education, and support of Griffith Park. We recognize that events outside of the park’s borders – particularly those in close proximity – greatly impact the park’s natural balance and the many ways that the citizens of Los Angeles use the park for their recreational activities. Therefore, we advocate for the overall biological health of the Santa Monica Mountains Range and the Los Angeles River Corridor region.

Response to Comment No. 22-1

The introductory comments are noted and have been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 22-2

To maintain Griffith Park’s natural and recreational elements, and to preserve the natural qualities of the entirety of the Santa Monica Mountain Range, we support Alternative 5 as a viable plan, whereby Forest Lawn may still significantly expand and develop its private property while minimizing negative impacts on contiguous Griffith Park. This recommendation is made irrespective of our recognition that Forest Lawn has already removed large amounts of natural habitat from its property over the last years. Our understanding is that the more recent scraping of acreage has been done entirely under a “conditional use permit” dating back to 1948, predating CEQA status. Except for the removal of 400+ oak trees (L.A. Superior Court Case No C187405, settled with City of Los Angeles in closed City Council session in 1998), we have been advised by Forest Lawn representatives that there is a legal basis for those activities which, of course, we aptly respect.
Response to Comment No. 22-2

The Commentor’s support for Alternative 5 is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. As explained on page VI-51 in Section VI, Alternatives, of the Draft EIR, Alternative 5 would result in approximately 84 acres of usable acreage and approximately 73 acres of developable acreage, as compared to approximately 110 acres of usable acreage and approximately 94 acres of developable acreage under the proposed Project. Although impacts to biological resources under Alternative 5 would be reduced when compared to the proposed Project, Alternative 5 would provide a substantial reduction in cemetery development and approximately 50,000 fewer interment spaces (an approximately 25 percent reduction in interment spaces) as compared with the proposed Project. Accordingly, as explained on page VI-61 of the Draft EIR, Alternative 5 would only partially meet the Project’s objectives, including to help meet the demands for interments for the region through 2050 and beyond, to provide various types of interment spaces and mortuary facilities to meet the needs of a broad array of ethnic and socio-economic groups, to provide space to accommodate multiple funeral services simultaneously, to provide sufficient ground property, and to provide areas for additional historical and inspirational works of art. Therefore, Alternative 5 would fail to match the proposed Project’s ability to meet the projected future demand identified for the memorial park facilities and the regional demand for burial space.

As explained on pages II-1 and II-3, in the Project Description of the Draft EIR, the majority of the Project Site, approximately 410 acres, is permitted as a cemetery pursuant to a Conditional Use Permit issued by the City of Los Angeles in 1948, and approximately 30 acres are permitted for cemetery use pursuant to subsequent Conditional Use Permits issued by the City. As such, Forest Lawn has operated a cemetery use at the Project Site for approximately 60 years. As explained on pages H-10 to H-11 of Section IV.H, Land Use Planning, of the Draft EIR, in 1980, the City adopted the Oak Tree ordinance, which included certain exemptions from the new oak tree removal and relocation permit requirements for certain previously approved projects. Forest Lawn applied for verification from the City that the this exemption applied to the Forest Lawn Memorial-Park–Hollywood Hills property. As a result of this request, the City and Forest Lawn entered into a Stipulated Judgment (filed with the Superior Court) in 1998 to govern the removal or relocation of oak trees from the Forest Lawn Memorial-Park–Hollywood Hills property. Pursuant to the 1998 Stipulated Judgment, Forest Lawn is permitted to remove or relocate oak trees from the Forest Lawn Memorial-Park–Hollywood Hills property. Forest Lawn is required to replace any oak tree removed from the Forest Lawn Memorial-Park–Hollywood Hills property with an oak tree sapling (propagated, to the extent possible, from acorns collected from coast live oak specimens located on the Hollywood Hills property). The oak tree saplings may be planted within Forest Lawn's property or installed on City property around and including Griffith Park.
Comment No. 22-3

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

Response to Comment No. 22-3

The general introductory comment regarding the Project and Alternatives 2 and 3 is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the environmental analysis in the Draft EIR are responded to below.

Comment No. 22-4

SPECIFIC COMMENTS:

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

Response to Comment No. 22-4

The comment states that the Draft EIR incorrectly refers to Griffith Park as an “island” that is largely isolated. To clarify, the Draft EIR describes an “island” of natural open space consisting of approximately 3,700 acres south of State Highway 134, east of Barham Boulevard, west of Interstate 5, and north of the southern boundary of Griffith Park. As the Draft EIR explains, in addition to Griffith Park natural areas, this area includes undeveloped areas of the Project Site, and other privately owned properties in the Cahuenga Peak/Mt. Lee area and is surrounded by the developed urban area. (See Section IV.C, Biological Resources, of the Draft EIR, page IV.C-20.) The Draft EIR notes that this area of natural habitat is largely isolated, with no connective habitat to natural areas west of the Hollywood Freeway, and that no discernable corridors or critical pathways for terrestrial wildlife have been identified. (See page IV.C-39 of the Draft EIR.) The Draft EIR does not state, as the comment suggests, that wildlife does not pass out of this area. The Draft EIR describes the south and north slopes of the Hollywood Hills and notes that habitat generalists such as mule deer and coyote move freely between the various community types. (See Draft EIR page IV.C-20.) In addition, the Draft EIR notes
that a number of common, urban-adapted species, such as Virginia opossum, northern raccoon, mule deer, and coyote, can be found outside of the natural habitat block within the developed/cemetery portion of the Project Site, which contains low levels of evening light, closes at night, and provides urban-tolerant species with foraging area. (See page IV.C-19 of the Draft EIR.) The issue of connectivity between the Griffith Park habitat block and the Santa Monica Mountains to the west was summarized in the Draft EIR (see Section IV.C.2.b(6), Wildlife Movement, page IV.C-20) and discussed in detail in the General Biological Assessment, attached as Appendix C-1 to the Draft EIR. The analysis acknowledges that the Griffith Park habitat block is relatively porous for a number of organisms, including most resident bird species and mobile terrestrial organisms. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 22-5

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

Response to Comment No. 22-5

The Draft EIR discusses the relationship between Sennett Creek and the Los Angeles River Flood Control Channel in terms of hydrological connection and ecological connection. With respect to hydrological connectivity, as the Draft EIR explains in Section IV.G, Hydrology/Water Quality on page IV.G-3, Sennett Creek enters the Forest Lawn Memorial-Park property in the southern portion of the Project Site where stormwater flows from the north-facing slopes of the Santa Monica Mountains converge into a more distinct channel and flow onto the Project Site. Sennett Creek flows through the Project Site to an adjacent property, owned by Junior Achievement of Southern California, Inc., where waters from Sennett Creek then enter three corrugated metal pipes, each approximately 60 inches in diameter, located underneath Forest Lawn Drive. On the other side of the public right-of-way, the waters pass through a concrete outfall structure located on what appears to be Los Angeles Department of Water and Power property, to an outlet into the concrete channel of the Los Angeles River.

The current condition of the River at its confluence with Sennett Creek is degraded and human-modified. The Los Angeles River is entirely concrete-lined at the confluence, and has been deepened substantially below the grade at which it once naturally joined with Sennett Creek. The Los Angeles River Flood Control Channel has no vegetation or canopy at its confluence with Sennett Creek. As noted above, Sennett Creek flows are now conveyed under Forest Lawn Drive through three large, circular pipes and into an
outfall structure, which appears to be entirely concrete, but the bottom of the structure has sand and cobbles in it. Sediment has accumulated and appears to provide a substrate supporting vegetation. A mix of invasive, non-native trees and native riparian vegetation is now present in the outfall structure, including Peruvian pepper trees (Schinus molle), black cottonwood (Populus trichocarpa), willow (Salix sp.), mulefat (Baccharis salicifolia), California grape (Vitis californica), and poison oak (Toxicodendron diversilobum). Flows drop down into the Los Angeles River Flood Control Channel from the inclined outfall at an approximate height of 25 feet above the floor of the channel. Mammals, most reptiles and amphibians cannot presently move into or out of the outfall structure or out of the channel, although some animals may be washed into the channel from time to time during higher intensity storms. Additionally, when the River is in flood stage its flows are likely high enough to reach to the outfall. Birds can fly freely from the channel bottom, through or over the outfall, across Forest Lawn Drive, and into Sennett Creek, but no habitat is present in the channel at this location to support most native animal species. Wading birds, waterfowl, and birds associated with open areas (red-tailed hawks, turkey vultures, various ducks, etc.) can be found foraging in the channel.

With respect to ecological connectivity, as the Draft EIR explains on page IV.C-20, Sennett Creek originally was comprised of oak/sycamore dominated riparian woodland that stretched from the Los Angeles River upward into what is now called Royce’s Canyon in Griffith Park. Prior to 1940, Sennett Creek was one of many ecologically functional tributaries to the Los Angeles River. With the channelization of the Los Angeles River, Sennett Creek has been truncated. Portions of the creek have been affected by historic development of the Project Site as well; however, those previously affected sections have been largely restored and are now comprised of mixed willow riparian scrub intermixed with newly established sycamores, cottonwoods, and coast live oaks. (See Section IV.C, Biological Resources, of the Draft EIR, page IV.C-20.) Currently, Sennett Creek provides habitat and cover for riparian-dwelling and stream-dependent organisms, but it has no direct ecological connection with the Los Angeles River, as it once did. As such, it provides a water source and a movement area for animals like mule deer, long-tailed weasel (Mustela frenata), bobcat (Lynx rufus) and northern raccoon; however, its functions with regard to connectivity into greater Los Angeles River–associated habitats have been largely eliminated due to the current condition of the River and the extensive conversion of habitats throughout the San Fernando Valley. Moreover, regulatory status organisms that once might have used the river to access other tributary stream systems (such as anadromous fish species, California red-legged frog [Rana draytonii], and regulatory status small mammals like Los Angeles pocket mouse [Perognathus longimembris brevinasus] and perhaps kangaroo rats [Dipodomys spp.]) now are in decline or absent. Therefore, while organisms now present in the area most likely do venture into Sennett Creek for water and for cover, they do not do so in a manner consistent with the actual role of wildlife corridors. (See page IV.C-22 of the Draft EIR.)
Comment No. 22-6

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

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

Response to Comment No. 22-6

The comment discusses the importance of riparian habitat and expresses concern about potential Project impacts to riparian habitat and wildlife in Griffith Park. The analysis in the Draft EIR addresses riparian habitat and its importance. As explained in detail in the General Biological Assessment, attached as Appendix C-1 to the Draft EIR, woodland communities in cismontane Southern California occur where increased soil moisture allows trees and tree canopies to develop. On south-facing exposures, this phenomenon occurs most frequently in close proximity to streams and in canyons shaded from solar penetration. On north-facing slopes and exposures, such as those found on the Project Site, woodlands tend to exhibit their highest diversity in association with streams. Due primarily to aspect (solar angle) and sometimes other various edaphic (soil) conditions, north-slope woodlands are generally dominated by coast live oak trees not dependent directly on stream-associated moisture. When mature, these woodlands establish a sustainable and complex microclimate. Numerous moisture-dependent shrubs, annual plant species and woodland-dependent wildlife thrive within the relatively moderate temperature regime as compared to adjacent scrub, grassland and chaparral communities. Deep forest soil and forest litter profiles can develop, fostered by microclimatic conditions and enhanced over time by the tree canopy and associated protective elements. The combination of the tree canopy, high amount of overall biomass, deep heterogeneous organic soil layers, prevalence of shade, soil moisture and downed wood, provides a unique and stable habitat for larger mammal, amphibian, avian and invertebrate species. (See page 25 of the General Biological Assessment for Forest Lawn Memorial-Park, Hollywood Hills.)
As explained in the Draft EIR, the proposed Project would impact approximately 12 acres of riparian-associated habitats (e.g., western sycamore/coast live oak, western sycamore/willow riparian forest, southern willow scrub, mulefat scrub, southern willow scrub/mulefat scrub, and disturbed mulefat scrub) on the Project Site. Sennett Creek would be avoided by the proposed Project, with the exception of a small area of riparian habitat that would be affected by a proposed culvert crossing similar in design to existing road crossings, though the new crossing would be soft-bottomed to further reduce impacts. Most of the Sennett Creek tributaries which would be affected by Project development do not contain surface water during summer months, although the lower reaches of Sennett Creek appear to support surface water each year. During summer months when water is scarce and found mostly in lower elevation areas, the preservation of Sennett Creek should provide adequate water resources. Though approximately 12 acres of riparian-associated habitat would be removed and animal movement through several drainages on the Project Site would be impeded with implementation of the proposed Project, the proposed Project would not create a substantial barrier to animal movement given the small area of the larger habitat complex that would be affected. Furthermore, the existing impaired connectivity to the Los Angeles River via Sennett Creek and its tributaries, which provide habitat and cover but no longer have direct ecological connection with the Los Angeles River, would remain in place. Please refer to Response No. 5 for additional information.

Implementation of the proposed mitigation measures described in Section IV.C of the Draft EIR, including Mitigation Measures C-1 through C-6, C-10 through C-16, and C-18 through C-19, would be expected to further reduce impacts, resulting in an overall impact with respect to animal movement that would not be significant. (See page IV.C-40 of the Draft EIR.) The Addendum Biological Analysis of the Proposed Off-Site Basin Areas for the Forest Lawn Memorial-Park, Hollywood Hills Master Plan within the City of Los Angeles, California, dated 31 August 2010, attached as Appendix C-10 of the Draft EIR, addressed direct impacts associated with the proposed installation of three debris basins to Griffith Park. Mitigation Measure C-20, set forth on page IV.C-53 of the Draft EIR, provides for the mitigation of potential impacts from construction of detention basins which are located partially off-site on Griffith Park at a 2:1 ratio, including the restoration with similar habitat types and protected tree replacement. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 22-7

The proposed plan shows little coordination with two overriding plans which aim to drive positive change for a 50-plus mile stretch of the Los Angeles River: 1) the Los Angeles City Revitalization Master Plan and 2) the County Los Angeles River Master Plan. Especially as these revitalization plans contemplate a more natural river in the future, the Sennett Creek corridor, connecting the river to higher Griffith Park habitat, may plan an even more important role as a corridor in the future. This puts an extraordinary value on the biological purposes Sennett Creek may serve in the future, as well [sic] its upper
tributaries which are in jeopardy due to the proposed project. The FEIR should consider this fact and should properly recognize these river revitalization Master Plans. The FEIR should also deal with the reality that there may be no way to mitigate the loss of full functionality of this very special riparian corridor.

**Response to Comment No. 22-7**

The Los Angeles River Master Plan was completed by the County of Los Angeles Department of Public Works in 1996. The County Los Angeles River Master Plan recognizes the Los Angeles River as a resource of regional importance that must be protected and enhanced. Since the adoption of the Los Angeles River Master Plan in 1996, the subsequent Sign Guidelines and the Landscaping Guidelines and Plant Palettes amendments to the Los Angeles River Master Plan were approved by the County Board of Supervisors in March 2004. The Los Angeles River Master Plan and companion Corridor Highlights document were reissued by the County in April 2005. The intent of the Los Angeles River Master Plan is to identify ways to revitalize the publicly owned rights of way along the Los Angeles River Flood Control Channel. The goals of the Los Angeles River Master Plan are to: ensure flood control and public safety; improve the appearance of the river; promote the river as an economic asset to surrounding communities; preserve, enhance and restore environmental resources in and along the river; consider stormwater management alternatives; ensure public involvement, provide a safe environment and a variety of recreational opportunities along the river; and ensure safe access to and compatibility between the river and other activity centers. The Implementation Chapter of the Los Angeles River Master Plan discusses ways that cities and local agencies can support the Master Plan through local planning documents.

The Los Angeles River Revitalization Master Plan, which provides the overall vision for revitalization of the Los Angeles River, is discussed on pages IV.H-8 to IV.H-9 in Section IV.H, Land Use Planning, of the Draft EIR. As the Draft EIR notes, the Plan intends to revitalize the general environment of the Los Angeles River over the near-term planning period (5 to 20 years) and the long-term planning period (20 to 50 years) by providing improved natural habitat, economic values, water quality, recreation, and open space amenities. The Los Angeles River Revitalization Master Plan purposes include the provision of improved public access to the River and the encouragement of reinvestment in the surrounding urban system that would result in economic growth. The Los Angeles River Revitalization Master Plan is a visionary document intended to provide communities with an idea of what future choices may entail regarding changes in and near the Los Angeles River. It is not intended to dictate how this transformation will occur. This responsibility is delegated to the Community Plan jurisdictions and will take effect in part, with the establishment of the RIO District. The proposed RIO District does not include the Project Site.
As described in the City of Los Angeles’ Los Angeles River Revitalization Master Plan, from Barham Boulevard to the confluence of the Los Angeles River with the Burbank Western Channel, the River is a concrete-lined rectangular channel approximately 130 feet wide. This area is known as Reach 5 in the Los Angeles River Revitalization Master Plan and is the area of the River to which the Project Site drains. The Project Site is not immediately adjacent to the Los Angeles River. Sennett Creek originates in the Royce Canyon area of Griffith Park, and it flows through Forest Lawn property to an adjacent property, owned by Junior Achievement of Southern California, Inc. Waters from Sennett Creek then enter three underground pipes, each approximately 60 inches in diameter, located underneath Forest Lawn Drive, a public street. On the other side of the public right-of-way, the waters pass through a concrete outfall structure located on what appears to be Los Angeles Department of Water and Power property, which is not publicly accessible and includes a high-voltage electrical tower, to an outlet into the concrete channel of the Los Angeles River.

Forest Lawn has successfully restored a large portion of Sennett Creek within the Project Site over the past approximately 12 years, and additional restoration is proposed in connection with the Project, including the restoration of an acre of riparian habitat adjacent to Sennett Creek. (See Mitigation Measure C-5 on page IV.C-47 of the Draft EIR.) Sennett Creek would be avoided by the proposed Project, with the exception of a small area of riparian habitat that would be affected by a proposed culvert crossing similar in design to existing road crossings, though the new crossing would be soft-bottomed to further reduce impacts.

The only other drainage on the Project Site that is directly tributary to the River is “Drainage L.” Drainage L is ephemeral in nature and only receives flows during storm events. All of “Drainage L” is heavily disturbed, and much of it flows on an old asphalt road. Drainage L conveys flows to the Los Angeles River through an existing 48-inch reinforced concrete pipe under Forest Lawn Drive. Drainage L is jurisdictionally disjunct and not continuous due to historic disturbance. Under the proposed Project, Drainage L would be enhanced, and Project mitigation includes the creation of an acre of riparian habitat along Drainage L. (See Mitigation Measure C-4 on pages IV.C-46 to IV.C-47 of the Draft EIR.)

The comments addressing riparian habitat loss and wildlife movement are addressed in Response Nos. 5 and 6. Please see Response to Comment Nos. 22-5 and 22-6 for additional information.

26 City of Los Angeles, Los Angeles River Revitalization Master Plan, April 2007, pages 3-2 and 3-3.
Comment No. 22-8

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

Response to Comment No. 22-8

As explained in the Draft EIR and in Response to Comment No. 22-6, the proposed Project would impact approximately 12 acres of riparian-associated habitats (e.g., western sycamore/coast live oak, western sycamore/willow riparian forest, southern willow scrub, mulefat scrub, southern willow scrub/mulefat scrub, and disturbed mulefat scrub) on the Project Site. Most of the Sennett Creek tributaries which would be affected by Project development do not contain surface water during summer months, although the lower reaches of Sennett Creek appear to support surface water each year. During summer months when water is scarce and found mostly in lower elevation areas, the preservation of Sennett Creek should provide adequate water resources. Though approximately 12 acres of riparian-associated habitat would be removed and animal movement through several drainages on the Project Site would be impeded with implementation of the proposed Project, the proposed Project would not create a substantial barrier to animal movement given the small area of the larger habitat complex that would be affected. Furthermore, the existing impaired connectivity to the Los Angeles River via Sennett Creek and its tributaries, which provide habitat and cover but no longer have direct ecological connection with the Los Angeles River, would remain in place. Implementation of the proposed mitigation measures described in Section IV.C of the Draft EIR, including Mitigation Measures C-1 through C-6, C-10 through C-16, and C-18 through C-19, would be expected to further reduce impacts, resulting in an overall impact with respect to animal movement that would not be significant. (See page IV.C-40 of the Draft EIR.)

As explained in the Draft EIR, the Project would not result in any significant environmental impacts after implementation of mitigation measures. Thus, the alternatives analysis set forth in Section VI, Alternatives, of the Draft EIR, evaluates alternatives that would reduce overall development to examine whether the less-than-significant impacts associated with the Project could be further reduced. Specifically, given that most of the proposed Project development would occur within the undeveloped portions of the existing cemetery property in the Hollywood Hills, each of the alternatives evaluated in the Draft EIR include reductions in the amount of cemetery development proposed in the undeveloped portions of the Project Site based on the preservation of several of the on-site potentially jurisdictional drainages, particularly those with the highest biological and functional values. (See page VI-5 of the Draft EIR.) As explained in the Draft EIR, Section
15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project must identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. As set forth on page VI-62 of the Draft EIR, Alternative 4 (Reduced Project with Preservation of Drainages D, D1, F, F1, and H) would be the Environmentally Superior Alternative. Although Alternative 4 would reduce impacts as compared with the proposed Project, Alternative 4 would meet several of the Project objectives to a lesser degree than the proposed Project. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 22-9**

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

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

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

**Response to Comment No. 22-9**

Section IV.C of the Draft EIR as well as its technical appendices thoroughly analyze Project effects on flora, fauna, wildlife movement and natural tributaries to the Los Angeles River. The *General Biological Assessment for Forest Lawn Memorial-Park, Hollywood Hills*, attached as Appendix C-1 to the Draft EIR, (Section 3.0 Vegetation and Plant Communities, page 25) acknowledges the special conditions present within oak woodlands and associated riparian communities with regard to microclimate, diversity, and overall ecological complexity, as well as the uniqueness that arises from these conditions. As explained in detail in the General Biological Assessment, woodland communities in cismontane Southern California occur where increased soil moisture allows trees and tree
canopies to develop. On south-facing exposures, this phenomenon occurs most frequently in close proximity to streams and in canyons shaded from solar penetration. On north-facing slopes and exposures, such as those found on the Project Site, woodlands tend to exhibit their highest diversity in association with streams. Due primarily to aspect (solar angle) and sometimes other various edaphic (soil) conditions, north-slope woodlands are generally dominated by coast live oak trees not dependent directly on stream-associated moisture. When mature, these woodlands establish a sustainable and complex microclimate. Numerous moisture-dependent shrubs, annual plant species and woodland-dependent wildlife thrive within the relatively moderate temperature regime as compared to adjacent scrub, grassland and chaparral communities. Deep forest soil and forest litter profiles can develop, fostered by microclimatic conditions and enhanced over time by the tree canopy and associated protective elements. The combination of the tree canopy, high amount of overall biomass, deep heterogeneous organic soil layers, prevalence of shade, soil moisture and downed wood, provides a unique and stable habitat for larger mammal, amphibian, avian and invertebrate species. (See page 25 of the General Biological Assessment for Forest Lawn Memorial-Park, Hollywood Hills.)

Potential Project impacts to sensitive habitat were evaluated in Section IV.C, Biological Resources, of the Draft EIR and in the General Biological Assessment, attached as Appendix C-1 to the Draft EIR. The vegetation and plant communities existing on the Project Site are described in detail on pages IV.C-13 to IV.C-18 of the Draft EIR, and potential vegetation community impacts associated with the proposed Project are described on pages IV.C-27 and IV.C-29 of the Draft EIR. In addition, Table IV.C-1, Vegetation Communities on the Project Site, on page IV.C-28 of the Draft EIR, lists each natural vegetation community on the Project Site, its acreage, the acreage impacted by the Project, and regulatory status designation, if any. Figure IV.C-4 on page IV.C-30 of the Draft EIR depicts the vegetation communities that would be affected by the proposed Project. As the Draft EIR explains, of the approximately 120 acres of native vegetation communities present on the Project Site, approximately 18.02 acres of vegetation communities locally designated as a Highest Inventory Community by the City of Los Angeles CEQA Thresholds Guide and/or identified as a CDFG Special Community (or the functional equivalent thereof) would be permanently impacted by the implementation of the proposed Project, including approximately 9.27 acres of western sycamore/coast live oak, approximately 7.64 acres of coast live oak woodland, approximately 0.62 acre of California walnut woodland, approximately 0.39 acre of southern willow scrub/mulefat scrub, approximately 0.05 acre of southern willow scrub, and approximately 0.05 acre of western sycamore/willow riparian forest. Implementation of the proposed mitigation program described in the Draft EIR, including Mitigation Measures C-1 through C-6, Mitigation Measure C-8, and Mitigation Measures C-15 through C-17, would reduce the impacts to these regulatory status vegetation communities to a less-than-significant level. (See page IV.C-29 of the Draft EIR.) The Draft EIR also describes the Project impacts to vegetation communities that are not considered regulatory status, which would be less than significant. (See page IV.C-29 of the Draft EIR.)
As explained in the Draft EIR, the proposed Project would impact approximately 12 acres of riparian-associated habitats (e.g., western sycamore/coast live oak, western sycamore/willow riparian forest, southern willow scrub, mulefat scrub, southern willow scrub/mulefat scrub, and disturbed mulefat scrub) on the Project Site. Most of the Sennett Creek tributaries which would be affected by Project development do not contain surface water during summer months, although the lower reaches of Sennett Creek appear to support surface water each year. The loss of riparian resources on-site would be off-set both on the Project Site and off-site in the Los Angeles River watershed. Forest Lawn has successfully restored a large portion of Sennett Creek within the Project Site over the past approximately 12 years, and additional restoration is proposed in connection with the Project, including the restoration of an acre of riparian habitat adjacent to Sennett Creek. (See Mitigation Measure C-5 on page IV.C-47 of the Draft EIR.) Also, under the proposed Project, Drainage L, which is currently heavily disturbed, would be enhanced, and Project mitigation includes the creation of an acre of riparian habitat along Drainage L. (See Mitigation Measure C-4 on pages IV.C-46-47 of the Draft EIR.) Mitigation Measure C-2, set forth on page IV.C-46 of the Draft EIR, includes planting of 23 acres of graded slopes on the Project Site with native plant communities, including woodland, chaparral and scrub. Additionally, Mitigation Measure C-6 includes selective revegetation of areas described in Mitigation Measures C-1 through C-5 with the appropriate native species pursuant to a habitat improvement and monitoring program.

In addition, Forest Lawn has entered into an agreement with the Mountains Recreation and Conservation Authority, a joint powers agency of the Santa Monica Mountains Conservancy, for the provision of off-site mitigation (creation/restoration of areas subject to CDFG and Army Corps jurisdiction) in the Los Angeles River watershed in connection with the Project by the Mountains Recreation and Conservation Authority. The resulting improvement to other currently degraded riparian systems in the Santa Monica Mountains and Los Angeles River watershed would provide additional and better quality riparian habitat for plants and animals to successfully become established, resulting in tangible improvements to ecosystems and ecosystem subunits associated with the upper reaches of the Los Angeles River.

The Draft EIR included a full evaluation of biological resources as required by CEQA, including vegetation communities, streams, rare plants, protected trees and wildlife. Implementation of the biological mitigation measures required by the Draft EIR (C-1 through C-17) would reduce Project impacts to a level considered less than significant. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 22-10

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

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

**Response to Comment No. 22-10**

As explained in the cumulative impacts discussion in the Biological Resources Section of the Draft EIR, although Griffith Park and other undeveloped lands are directly south, east and west of the Project Site, the other surrounding areas are highly urbanized and would be rarely utilized by wildlife other than those adapted to urban environments. The functional natural habitat within the Project Site is at the edge of the Hollywood Hills/Griffith Park habitat complex, and the 70.42 acres of natural areas on the Project Site that would be impacted by the proposed Project comprise just 1.9 percent of the approximate 3,700-acre area of remnant natural habitat in the easternmost Santa Monica Mountains. Thus, the Project Site does not function as a “macro-corridor” for biological resources. The Project Alternatives would impact a lesser amount of the natural vegetation communities on-site than the proposed Project, as discussed in Section VI, Alternatives, of the Draft EIR, and thus a lesser percentage of the total natural area. This relatively small area that would be affected by the proposed Project (in comparison to the approximately 3,700-acre habitat block) would support a proportionally small amount of wildlife movement. Thus, barriers or impediments to movement in this small area would not preclude or eliminate animal movement on the north slope of the Santa Monica Mountains/Hollywood Hills, and impacts associated with wildlife movement would be less than significant. (See pages IV.C-39-40 of the Draft EIR.) Further, the 3,700-acre block of relatively natural habitat is, in itself, largely isolated, lacking any connective habitat to natural areas west of the Hollywood Freeway. Nor have corridors or critical pathways for terrestrial wildlife been identified. While birds and highly mobile animals may be able to traverse the Cahuenga Pass, the Project Site is not considered to be a major wildlife movement corridor, especially given the highly urbanized condition of its surroundings. (See page IV.C-43 of the Draft EIR.) As discussed in the Draft EIR, the proposed Project would not have a significant impact on biological resources (including vegetation communities, regulatory status animal or plant species, protected trees, or jurisdictional features) with implementation of the proposed mitigation program. Any impacts to biological resources similar to those impacted by the proposed Project as a result of the related projects would likely be subject to mitigation, resulting in less-than-significant impacts for those related projects as well. (See page IV.C-43 of the Draft EIR.) Thus, the Project’s
potential cumulative impacts with respect to biological resources would be less than significant. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 22-11

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

Response to Comment No. 22-11

The comment suggests that the EIR should survey for the presence of bat species within the Project Site and that surveys are necessary in order to propose mitigation measures. The General Biological Assessment (attached as Appendix C-1 to the Draft EIR) and Section IV.C, Biological Resources, of the Draft EIR, address the regulatory status bat species with potential to occur on the Project Site. Bat species that were considered are the pallid bat, Mexican long-tongued bat, Townsend’s big-eared bat, spotted bat, western mastiff bat, western red bat, western yellow bat, California leaf-nosed bat, cave myotis, pocket free-tailed bat, and big free-tailed bat. (See pages 62–65 of the General Biological Assessment.) As explained on page IV.C-23 of the Draft EIR, the evaluation for presence of regulatory status organisms included such variables as availability of support resources (such as rock outcrops, surface water, specific host plants, and nesting sites), the location and size of the Project Site, and the history of disturbance. The likelihood of potential occurrences is further predicated on the known distribution of species and their overall habitat requirements and preferences. Consistent with the comment’s suggestion, the habitat needs and known occurrences, including those on Griffith Park, were taken into consideration in the analysis. In addition, the February 2008 Draft Griffith Park Wildlife Management Plan, which was an attachment to the Greater Griffith Park Neighborhood Council comment on the Draft EIR Notice of Preparation, and included in Appendix A to the Draft EIR, was taken into account during the preparation of the biological resources section of the Draft EIR, as well as the February 2009 Draft Report regarding the results of bat surveys conducted on the adjacent Griffith Park property in 2008.

As explained on page 20 of the General Biological Assessment, a species was determined to have a low probability of occurrence on the Project Site if the Project Site is within the historic range or distribution of the species, and habitat on the Project Site is marginal to suitable, but other conditions may exist (adjacent urbanization, isolation, etc.) to
suggest a low probability of occurrence. Transitory presence is not necessarily precluded, but site conditions are such that sustained or seasonal presence is unlikely. A species was determined to have a moderate potential of occurrence on the Project Site if the Project Site is within the historic range or distribution of the species, the species has a reasonable possibility of occurrence within the Project Site, habitats are suitable, and the species is known to occur in the area. Some areas of habitat may be slightly altered or degraded from original condition but overall conditions are such that sustained or seasonal presence is possible. As explained on page 21 of the General Biological Assessment, a species was determined to have a high potential of occurrence on the Project Site if the Project Site is within the historic range or distribution of the species, the Project Site contains suitable to very favorable habitat for the species, and the organism has recently been recorded in the vicinity, or ecological conditions are such that qualified personnel can reasonably anticipate presence.

The Mexican long-tongued bat, Townsend’s big-eared bat, and western yellow bat were determined to have a low probability to occur on-site. The cave myotis was determined not to occur on the Project Site. As noted on page IV.C-37 of the Draft EIR, one regulatory status bat species, western red bat, was determined to have a high likelihood of occurrence on the Project Site. The western red bat is considered a species of special concern, second priority by the CDFG. Three regulatory status bat species, pallid bat, spotted bat, and western mastiff bat, were determined to have a moderate likelihood of occurrence on the Project Site. For purposes of the analysis, the Draft EIR conservatively assumed that these four regulatory status bat species (those with a moderate to high likelihood of occurrence on the Project Site) would be potentially impacted by the proposed Project. As noted on page IV.C-37 and on Table IV.C-2 on pages IV.C-31 through IV.C-33 of the Draft EIR, the proposed Project could remove up to 17.6 acres of habitat that is potentially occupied by western red bat, pallid bat, and western mastiff bat, and up to 17 acres that is potentially occupied by spotted bat. This potential impact to up to four regulatory status bat species could be considered potentially significant prior to mitigation. However, implementation of the mitigation measures provided in the Draft EIR, including Mitigation Measures C-1 through C-6, C-12, C-13, C-15, C-16, C-18, and C-19, would reduce the potential impacts to these four regulatory status bat species to a less-than-significant level. In particular, Mitigation Measures C-12 and C-13 would require pre-construction surveys for regulatory status bat roosts and for maternity roosts during the maternity roosting season prior to Project-related clearing, grubbing, demolition, and/or tree removal. As the mitigation measures will be implemented based on the moderate to high likelihood of these four regulatory status bat species occurring within the Project Site, no surveys were conducted or determined to be necessary to confirm their presence or absence.

In addition, bat species designated as Special Animals by CDFG were evaluated for potential presence on the Project Site and are set forth in Appendix E to the General Biological Assessment. These Special Animal bat species include: silver-haired bat, hoary
bat, small-footed myotis, long-eared myotis, fringed myotis, and Yuma myotis. (See pages E-4 and E-5 of Appendix E to the General Biological Assessment.) The hoary bat and Yuma myotis were both determined to have a high likelihood of occurrence on the Project Site; the small-footed myotis was determined to have a moderate likelihood of occurrence on the Project Site; and the others were determined to have a low probability of occurrence on the Project Site. As explained in footnote 19 on page IV.C-35 of the Draft EIR, neither CEQA nor the City of Los Angeles CEQA Thresholds Guide requires an assessment of impacts to Special Animals; accordingly, any potential impacts to these species would be less than significant. Nevertheless, any potential impacts to Special Animals would be reduced with the implementation of the mitigation measures set forth in Section IV.C of the Draft EIR and described above.

Comment No. 22-12

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

Response to Comment No. 22-12

The biological resources analysis in the Draft EIR included both diurnal raptor and nocturnal owl surveys on the Forest Lawn Property, as stated in Section IV.C, Biological Resources, of the Draft EIR. As noted on page IV.C-2, the Diurnal Raptor Surveys for Forest Lawn Memorial-Park, Hollywood Hills within the City of Los Angeles, California, dated 11 August 2010, and Winter Owl Surveys for Forest Lawn Memorial-Park, Hollywood Hills within the City of Los Angeles, California, dated 11 August 2010, were included among the reports prepared for the Project Site and were attached to the Draft EIR as Appendix C-13 and Appendix C-9, respectively. American peregrine falcon was evaluated for presence on the Project Site and was not detected, as noted on page 60 of the General Biological Assessment, attached as Appendix C-1 to the Draft EIR. Similarly, white-tailed kite was evaluated for presence on the Project Site and was not detected, as noted on page 59 of the General Biological Assessment. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 22-13

Third, besides hundreds of CNPS Rare plant species identified on the property, a Brodiaea species, only tentatively identified as B. terrestris ssp. Kernensis, is not given stature because it is not CNPS listed. However, it may be the only representation of this species in the entire Santa Monica Mountains area, so should be considered.
Response to Comment No. 22-13

As explained on page IV.C-24 of the Draft EIR, four regulatory status plant species, one of which is considered a cultivar, were detected on the Project Site: Catalina mariposa lily (Calochortus catalinae), Coulter’s matilija poppy (Romneya coulteri) (determined to be a cultivar and not relevant to the rare plant survey effort), ocellated Humboldt lily (Lilium humboldtii ocellatum), and Southern California black walnut. All three relevant regulatory status plant species have a List 4.2 designation by the CNPS, which means that they are on a watch list of plants of limited distribution in California. These plants are also locally designated by the City CEQA Thresholds Guide. A table presenting all of the regulatory status plant species considered and evaluated for potential to occur on-site based on the data compilation and background research, as well as focused field investigations, is included as Table 3 in the General Biological Assessment, attached as Appendix C-1 to the Draft EIR. For additional detail, see Rare Plant Survey and Assessment for Forest Lawn Memorial-Park, Hollywood Hills, attached as Appendix C-6 to the Draft EIR. The Brodiaea terrestris ssp. kernensis occurrence on the Project Site is indicated on page A-6 in Appendix A, Floral Compendium, to the General Biological Assessment. As the comment notes, this species is not listed as a regulatory status rare plant, and, accordingly, an assessment of potential impacts is not required pursuant to CEQA or the City of Los Angeles CEQA Thresholds Guide, and any potential impacts would be less than significant. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 22-14

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

Response to Comment No. 22-14

As the Draft EIR explains on page IV.C-22 of Section IV.C, Biological Resources, the Project Site is currently fenced along Forest Lawn Drive (i.e., the north property boundary), along the eastern boundary with Griffith Park, and along a portion of the southern boundary with Griffith Park. The fence along the southern boundary of the Project Site extends from the southeast corner of the Project Site to the area near Drainages E and F in the central portion of the Project Site. Other areas of the Project Site adjacent to undeveloped areas are otherwise maintained in their natural state. Where fencing is
III. Responses to Comments

placed along the property line, it tends to be porous in terms of wildlife movement, and birds, small mammals, snakes, lizards, and invertebrates generally would not experience any barriers as a result of the existing fencing. The impact analysis on pages IV.C-40 and IV.C-41 of the Draft EIR explains that the Project Site’s existing fencing is expected to remain, and additional fencing or replacement fencing may be installed over time as needed for safety purposes. New fencing, if added, would be placed within the designated disturbance footprint of the Project. Consistent with the existing fencing, any additional fencing along the property line would have little to no effect on birds, small mammals, snakes, lizards, amphibians, and invertebrates, as they generally do not experience any barriers as a result of the existing fencing. Larger mammals likely use avenues of opportunity to circumvent fencing by jumping or climbing, searching for gaps in drainages or low spots, or using tree limbs or tree canopies that extend over the fence. Thus, the existing fencing and any additional fencing is unlikely to substantially inhibit animal movement, and potential impacts associated with fencing would not be significant.

As noted in Section IV.H, Land Use Planning, of the Draft EIR, one of the performance standards set forth for cemeteries as a public benefit use under Section 14.00 of the Los Angeles Municipal Code is that there is a solid, decorative, masonry or wrought iron wall or fence at least 8 feet in height, or the maximum height permitted by the zone, whichever is less, that encircles the periphery of the property and does not extend into the required front yard setback. (See pages IV.H.9-10 of the Draft EIR and Section 14.00 A.1(b) of the Los Angeles Municipal Code.) In analyzing the Project’s conformance with this standard, the Draft EIR explains on page IV.H-27 that a wrought iron fence is provided along the northerly edge of the property adjacent to Forest Lawn Drive. Additional areas of the Project Site adjacent to undeveloped areas include a chain link fence along the property line, and other areas adjacent to undeveloped open space areas such as Griffith Park are otherwise maintained in their natural state. As the Draft EIR notes, the 444-acre Project Site includes areas of varying topography and extensive vegetation, which serve to further buffer the Project Site. The Draft EIR concludes that the Project is consistent with the purposes of the performance standard because the Project is located within the periphery of the existing Memorial-Park property and will thus be protected by the existing fences and natural barriers which also protect adjacent uses.

Comment No. 22-15

Conclusion: As stated in our opening summary, we recommend Project Alternative 5, for all the aforementioned reasons.

Response to Comment No. 22-15

The comment was addressed in Response to Comment No. 22-2. Please refer to Response to Comment No. 22-2. The comment is noted and has been incorporated into
the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 22-16**

Because of the short duration given to us to respond to the DEIR, despite a sixty-day extension request, subsequent comments may follow.

**Response to Comment No. 22-16**

Consistent with the requirements of CEQA, the Draft EIR was submitted to the State Clearinghouse, Office of Planning and Research, and was originally circulated for public review for a 45-day period. This 45-day comment period began on February 11, 2011. In response to requests to extend the review period, on March 25, 2011, the City of Los Angeles extended the comment period by an additional 15 days to April 13, 2011. Thus, the Draft EIR was circulated for a 60-day public review period, which exceeds the 45-day public review period required by *CEQA Guidelines* Section 15105 when a Draft EIR is submitted to the State Clearinghouse for review by State agencies. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 22-17**

Wildlife Corridor Study  
Griffith Park Natural History Survey  
Updated Mar. 2011

Cooper Ecological Monitoring, Inc.  
5850 W. Third St., #167  
Los Angeles, CA 90036  
www.cooperecological.com  
dan@cooperecological.com

The Griffith Park Natural History Survey is an effort to document the flora and fauna of America’s largest municipal park, which protects more than 4,000 acres of wildlife habitat. Since 2007, Cooper Ecological Monitoring, Inc. has worked with the Los Angeles Dept. of Recreation and Parks and other organizations to develop baseline inventories and species lists for the park.

**Project:** Wildlife Corridor Study by Cooper Ecological Monitoring, Inc. and USGS  
**Partners:** Caltrans; National Park Service; Los Angeles Dept. of Recreation and Parks  
**Start date:** Spring 2011
III. Responses to Comments

**Duration:** 1 year (to Spring 2012)  
**Request:** $11,161.60

Many species of large and mid-sized mammals are known to occur in Griffith Park and its surrounding area. However, little is known about how, if at all, several of these species enter and leave the park. In Los Angeles, where the landscape has been largely urbanized, blocks of relatively undisturbed habitat are connected by “movement corridors”, and movement of animals is stopped by barriers, or “choke points”. Understanding what kinds of animals use these corridors, how they are used, and understanding more about the impacts of choke points will provide us with information critical to the conservation of these wildland species. For instance, multi-lane highways have been known to act as both physical and social barriers for southern California carnivores (Riley et al. 2006) and ungulates (Ng et al. 2004).

Wildlife corridors at the edge of Griffith Park allow animals to move between the park and other larger, intact habitats, like the Hollywood Hills and the Santa Monica Mountains to the west, and possibly the Verdugo Mountains to the north. For example, we already know that deer use golf courses and other irrigated areas of the park, but their use of the L.A. River is poorly-known, as are their movements west, toward additional open space in the Santa Monica Mountains.

This study will be conducted by wildlife biologist Miguel Ordeñana (“MO”), and will be jointly managed by Daniel S. Cooper (“DC”) of CEM, Inc. and Erin Boydston (“EB”) of USGS. We will install up to 8 camera trap stations (at least 4 per underpass) at key locations where there are likely movement corridors and potential choke points, such as culverts, underpasses, and places where a drainage exits the park and meets a busy road/freeway. Ideally, a pair of cameras will be positioned on each side of the underpass entrance in order to verify full use of the underpass. The cameras will be paired in order to limit missed data due to camera malfunctioning and to document bobcat pelt patterns for the identification of individuals (Soisalo and Cavalcanti 2006, Silver et al. 2004; Heilbrun et al. 2003; Karanth 1995.)

Camera traps are often used to monitor wildlife use of underpasses, culverts, or other potential linkages between fragmented habitat (Lyren 2001; Ng et al. 2004; Lyren et al. 2009.) Our camera trap data will both supplement information provided by bobcat GPS collar data or previous Griffith Park surveys (Mathewson et al. 2008) and measure the permeability of various underpasses as a corridor for a variety of wide ranging mammal species. We will also coordinate our efforts with National Park Service and USGS camera studies ongoing farther west in the Santa Monica Mountains (e.g., at I-405 in the Sepulveda Pass.) Further, camera trap photos of charismatic flagship species (e.g., bobcats) will be used as local and regional outreach material. The photos can be used to
encourage local residents to contribute useful sightings information as well as connect the greater urban community with nature.

**Initial Efforts:**

Recent fieldwork (Mathewson et al. 2008) has confirmed the existence of a diverse large and mid-sized mammal fauna in Griffith Park. In 2010 in partnership with UCLA doctoral dissertation student Laurel Klein and the National Park Service, USGS began tracking three GPS-collared bobcats in Griffith Park and LADWP lands around Lake Hollywood. Initial telemetry information indicates that these bobcats also utilize areas outside of Griffith Park and LADWP boundaries west of highway CA-101 and north of Franklin Ave. Therefore, we plan to focus our initial monitoring efforts along highway 101 (on bridges and undercrossing in the Cahuenga Pass, which separates Griffith Park from large areas of wildlife habitat to the west.) We hope to expand our monitoring efforts to other potential chokepoints or corridors across highways that surround Griffith Park (e.g., I-5, CA-134) as more funding becomes available.

From this study, we hope to learn about the movement of various mammals including, but not limited to, the following:

- Mule deer *Odocoileus hemionus*
- Coyote *Canis latrans*
- Bobcat *Lynx rufus*
- Gray fox *Urocyon cinereoargenteus*

[Photo of **Mule Deer**]

[Photo caption: Small numbers are seen throughout the park and in residential areas west of the park.]

[Photo of **Coyote**]

[Photo caption: Found throughout the park and in surrounding urban zones, particularly the hilly neighborhoods of Los Feliz.]

This study will begin in Spring 2011 and continue for at least one year.

We will produce a final report of our findings, which will include:
III. Responses to Comments

- Maps showing locations of camera installations.
- Summary of species captured on images.
- Discussion of locations and importance of various corridors/choke points.

In addition, we will distribute brief quarterly reports highlighting important findings from the previous months, including photographs of wildlife.

**Response to Comment No. 22-17**

The comment is a description of a wildlife corridor study to be conducted over a one-year period from Spring 2011 to Spring 2012 as part of the Griffith Park Natural History Survey. According to the description, the study will focus on the movement of various mammals, including mule deer, coyote, bobcat, and gray fox. The description states that little is known about how large and mid-sized mammals known to occur in Griffith Park and its surrounding area enter and leave Griffith Park, if at all. The study will involve up to eight camera trap stations at locations where there are likely movement corridors and movement barriers, such as culverts, underpasses, and places where a drainage exits the park and meets a busy road or freeway. According to the description, the initial monitoring efforts will be focused along the 101 Freeway, on bridges and undercrossing in the Cahuenga Pass, which separates Griffith Park from large areas of wildlife habitat to the west. Please refer to Response to Comment No. 22-4 for additional information regarding animal movement in connection with the proposed Project. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment Letter No. 23

Ron Ostrow
President
Greater Griffith Park Neighborhood Council
ronostrow@ggpnc.org

Comment No. 23-1 (Correspondence regarding Draft EIR Public Review Period)

Email 1: Attached, please find a letter from the Greater Griffith Park Neighborhood Council regarding the Forest Lawn Memorial Park - Hollywood Hills Master Plan draft EIR.

Attachment to email: The Forest Lawn Memorial Park – Hollywood Hills Master Plan draft environmental impact report consists of thousands of pages and involves numerous buildings, as well as constructing walls inside Griffith Park.

The current time schedule does not allow for adequate review by community members considering the scope of the project. The Greater Griffith Park Neighborhood Council hereby respectfully requests that the public comment period be extended by at least 90 days.

Response from City: The public comment period for the Forest Lawn Memorial Park-Hollywood Hills Master Plan has been extended by an additional 15 days to Wednesday, April 13, 2011. A revised Notice of Preparation with the new closing date will be distributed shortly.

Email 2: Thank you for your reply.

Unfortunately, the Greater Griffith Park Neighborhood Council does not meet again until April 19th, thus the 15 day extension until April 13th that you have granted will not help us to sift through the voluminous DEIR or even determine whether our community wishes to file a comment, let alone actually draft one.

I would respectfully ask that you reconsider your decision. Our council had requested an extra 90 days. The Los Feliz Improvement Association requested until June 15th. Councilman LaBonge’s office requested 30 days. While the requests differ, they all recognized that the review period was too short and I would imagine we’d all agree that 15 days is equally insufficient to review a document of this scope and potential impact.

Thanks in advance for recognizing that ultimately it is the community that must live with the results of the decisions we all make today and that every effort should be made to allow their voices to be heard. I don’t think a longer extension than you propose is an unreasonable accommodation given the circumstances.
Response 2 from City: The procedures and time period for public review of a Draft Environmental Impact Report are set by state law in Sections 15087 and 15105 of the Guidelines for California Environmental Quality Act (California Code of Regulations, Title 14, Chapter 3.) Specifically, Section 15105(a) states that “The public review period for a draft EIR should not be less than 30 days nor longer than 60 days except in unusual circumstances.”

Following this directive, the City of Los Angeles Department of City Planning typically sets a public review period of 45 days for Draft EIRs, the midpoint between the minimum and maximum review period. The public review period for the Forest Lawn Memorial Park - Hollywood Hills Master Plan project’s Draft EIR was originally set at the standard 45 days, but in response to letters received from community groups and the City Council office, this period was extended by 15 days as a courtesy. There were no unusual circumstances identified to warrant an extension beyond the 60-day maximum set by state law in Section 15105(a) of the CEQA Guidelines.

A revised Notice of Preparation will be distributed shortly reflecting the new public comment due date of Wednesday, April 13. We look forward to seeing any comments you may have regarding the analysis presented in the Draft EIR.

Response to Comment No. 23-1

The specific procedures and time period for public review of a Draft Environmental Impact Report are mandated by state law in Sections 15087 and 15105 of the CEQA Guidelines. Specifically, Section 15105(a) states: “The public review period for a draft EIR should not be less than 30 days nor longer than 60 days except in unusual circumstances.” Consistent with the requirements of CEQA, the Draft EIR was submitted to the State Clearinghouse, Office of Planning and Research, and was originally circulated for public review for a 45-day period. This 45-day comment period began on February 11, 2011. In response to requests to extend the review period, on March 25, 2011, the City of Los Angeles extended the comment period by an additional 15 days to April 13, 2011. Thus, the Draft EIR was circulated for a 60-day public review period, which exceeds the 45-day public review period required by CEQA Guidelines Section 15105 when a Draft EIR is submitted to the State Clearinghouse for review by State agencies. There were no unusual circumstances identified by the City to warrant an extension beyond the 60-day maximum set by state law in Section 15105(a) of the CEQA Guidelines. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Further, to clarify, the Project does not propose the construction of walls inside Griffith Park. As noted on page II-11 of the Project Description of the Draft EIR, the Project includes the development and maintenance of debris basins within the Project Site and at the edge of the property boundary with Griffith Park.
Comment Letter No. 24

Ron Ostrow
President
Greater Griffith Park Neighborhood Council
P.O. Box 27003
Los Angeles, CA  90027-0003
www.ggpnc.org

Comment No. 24-1

By this letter the Greater Griffith Park Neighborhood Council (GGPNC) submits comments concerning the referenced DEIR.

The DEIR was released for review and comment in February 2011. As we stated in our March 17, 2011 letter requesting an extension of time to review the DEIR, the DEIR raises many issues relative to wildlife, wildlife corridors, biological resources, aesthetics, and the cumulative impact of a number of projects already underway or planned to begin soon. We believed then, and continue to believe, that the time allowed to comment on this massive document was inadequate. The fifteen-day extension granted was less than what we requested. Numerous other organizations, including the Los Feliz Improvement Association, the Santa Monica Mountains Conservancy, and the Sierra Club also requested longer extensions of time to comment.

While this letter includes initial comments about a number of issues concerning the DEIR, the GGPNC may file additional comment, as we uncover more concerns in the DEIR.

Response to Comment No. 24-1

The specific procedures and time period for public review of a Draft Environmental Impact Report are mandated by state law in Sections 15087 and 15105 of the CEQA Guidelines. Specifically, Section 15105(a) states: “The public review period for a draft EIR should not be less than 30 days nor longer than 60 days except in unusual circumstances.” Consistent with the requirements of CEQA, the Draft EIR was submitted to the State Clearinghouse, Office of Planning and Research, and was originally circulated for public review for a 45-day period. This 45-day comment period began on February 11, 2011. In response to requests to extend the review period, on March 25, 2011, the City of Los Angeles extended the comment period by an additional 15 days to April 13, 2011. Thus, the Draft EIR was circulated for a 60-day public review period, which exceeds the 45-day public review period required by CEQA Guidelines Section 15105 when a Draft EIR is submitted to the State Clearinghouse for review by State agencies. There were no unusual circumstances identified by the City to warrant an extension beyond the 60-day maximum set by state law in Section 15105(a) of the CEQA Guidelines. The comment is noted and
has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the environmental analysis in the Draft EIR are responded to below.

**Comment No. 24-2**

1. The DEIR refers to Griffith Park as a biological, isolated “island” through which land based animals do not pass. This is untrue. Griffith Park is both a geological and biological eastward extension of the Santa Monica Mountains. Land based wildlife does travel from the mountains to the west throughout Griffith Park, and numerous surveys have documented this travel. No one disputes the presence of deer, coyote, bobcats, foxes, and other animals in the area between Forest Lawn and Lake Hollywood. The proposed project, and all of the alternatives suggested, will restrict this narrow corridor.

**Response to Comment No. 24-2**

The comment states that the Draft EIR refers to Griffith Park as a biological, isolated “island” through which land-based animals do not pass and states that such description is untrue. To clarify, the Draft EIR describes an “island” of natural open space consisting of approximately 3,700 acres south of State Highway 134, east of Barham Boulevard, west of Interstate 5, and north of the southern boundary of Griffith Park. As the Draft EIR explains, in addition to Griffith Park natural areas, this area includes undeveloped areas of the Project Site, and other privately owned properties in the Cahuenga Peak/Mt. Lee area and is surrounded by the developed urban area. (See Section IV.C, Biological Resources, of the Draft EIR, page IV.C-20.) The Draft EIR notes that this area of natural habitat is largely isolated, with no connective habitat to natural areas west of the Hollywood Freeway, and that no discernable corridors or critical pathways for terrestrial wildlife have been identified. (See page IV.C-39 of the Draft EIR.) The Draft EIR does not state, as the comment suggests, that land-based animals do not pass out of this area. The assertion by the commentor that animals move across the Cahuenga Pass between Griffith Park and the eastern Santa Monica Mountains is largely correct for habitat generalists and mobile organisms, as noted in the Draft EIR and the General Biological Assessment. The proposed Project would not affect the movement of such organisms across parcels, open land, or connecting bridges. The Draft EIR describes the south and north slopes of the Hollywood Hills and notes that habitat generalists such as mule deer and coyote move freely between the various community types. (See Draft EIR page IV.C-20.) In addition, the Draft EIR notes that a number of common, urban-adapted species, such as Virginia opossum, northern raccoon, mule deer, and coyote, can be found outside of the natural habitat block within the developed/cemetery portion of the Project Site, which contains low levels of evening light, closes at night, and provides urban-tolerant species with foraging area. (See page IV.C-19 of the Draft EIR.) The biogeographic aerial provided as Figure IV.C-3 in the Draft EIR has been updated to better illustrate parcels in and around the area,
including Lake Hollywood, through which highly mobile organisms, avian organisms, and habitat generalists may move. Please refer to Figure IV.C-3A in Section II of this Final EIR.

The issue of connectivity between the Griffith Park habitat block and the Santa Monica Mountains to the west was summarized in the Draft EIR (See, Section IV.C.2.b(6), Wildlife Movement, page IV.C-20) and discussed in detail in the General Biological Assessment, attached as Appendix C-1 to the Draft EIR. The analysis acknowledges that the Griffith Park habitat block is relatively porous for a number of organisms, including most resident bird species and mobile terrestrial organisms.

As the Draft EIR explains, the natural habitat on the Project Site comprises approximately three percent of the total natural area in the eastern Santa Monica Mountains. The proposed Project would impact 70.42 acres, or 1.9 percent, of the total natural area east of the Hollywood Freeway. The Project Alternatives would impact a lesser amount of the natural vegetation communities on-site than the proposed Project, as discussed in Section VI, Alternatives, of the Draft EIR, and thus a lesser percentage of the total natural area. This relatively small area (in comparison to the approximately 3,700-acre habitat block) would support a proportionally small amount of wildlife movement. Thus, barriers or impediments to movement in this small area would not preclude or eliminate animal movement on the north slope of the Santa Monica Mountains/Hollywood Hills, and impacts associated with wildlife movement would be less than significant. (See pages IV.C-39-40 of the Draft EIR.)

Comment No. 24-3

2. The DEIR does not adequately address the threat to endangered or rare habitat. The animal surveys described in the appendices are inadequate. There are ongoing wildlife surveys taking place in and around Griffith Park, but these are not referenced in the DEIR. Without a comprehensive inventory of wildlife, the DEIR cannot competently address impacts on wildlife.

Response to Comment No. 24-3

Potential Project impacts to sensitive habitat were evaluated in Section IV.C, Biological Resources, of the Draft EIR and in the General Biological Assessment, attached as Appendix C-1 to the Draft EIR. The vegetation and plant communities existing on the Project Site are described in detail on pages IV.C-13 to IV.C-18 of the Draft EIR, and potential vegetation community impacts associated with the proposed Project are described on pages IV.C-27 and IV.C-29 of the Draft EIR. In addition, Table IV.C-1, Vegetation Communities on the Project Site, on page IV.C-28 of the Draft EIR, lists each natural vegetation community on the Project Site, its acreage, the acreage impacted by the Project, and regulatory status designation, if any. Figure IV.C-4 on page IV.C-30 of the Draft EIR depicts the vegetation communities that would be affected by the proposed
Project. As the Draft EIR explains, of the approximately 120 acres of native vegetation communities present on the Project Site, approximately 18.02 acres of vegetation communities locally designated as a Highest Inventory Community by the City of Los Angeles CEQA Thresholds Guide and/or identified as a CDFG Special Community (or the functional equivalent thereof) would be permanently impacted by the implementation of the proposed Project, including approximately 9.27 acres of western sycamore/coast live oak, approximately 7.64 acres of coast live oak woodland, approximately 0.62 acre of California walnut woodland, approximately 0.39 acre of southern willow scrub/mulefat scrub, approximately 0.05 acre of southern willow scrub, and approximately 0.05 acre of western sycamore/willow riparian forest. Implementation of the proposed mitigation program described in the Draft EIR, including Mitigation Measures C-1 through C-6, Mitigation Measure C-8, and Mitigation Measures C-15 through C-17, would reduce the impacts to these regulatory status vegetation communities to a less-than-significant level. (See page IV.C-29 of the Draft EIR.) The Draft EIR also describes the Project impacts to vegetation communities that are not considered regulatory status, which would be less than significant. (See page IV.C-29 of the Draft EIR.)

In addition, the Draft EIR evaluates potential impacts to animal species resulting from the vegetation community impacts described above. (See pages IV.C-29 through IV.C-37 of the Draft EIR.) Table IV.C-2, Regulatory Status Animal Species and Habitats, identifies the habitats on the Project Site that would be affected by the Project in which regulatory animal species with at least a moderate potential of occurrence may be present. (See pages IV.C-31 through IV.C-33 of the Draft EIR.) Further, the Draft EIR includes a detailed discussion of potential impacts to regulatory status faunal resources based on the physical limits of the proposed Project, the confirmed presence of animals, and the presumed presence of animals not detected but determined to have a moderate or high probability of occurring on the Project Site. (See pages IV.C-35 through IV.C-37 of the Draft EIR.) Table 3 in the General Biological Assessment (pages 36 through 65) lists regulatory status species evaluated for presence on the Project Site, and Appendix E to the General Biological Assessment lists State Special Animals evaluated for presence on the Project Site. As explained in the Draft EIR, the evaluation for presence for animal and plant species included such variables as availability of support resources, the location and size of the Project Site, and the history of disturbance. The likelihood of potential occurrences is further based on the known distribution of species, and their overall habitat requirements and preferences, including information from the California Natural Diversity Database (CNDDB) regarding species occurrence, population numbers, occurrence dates, and potential threats to organisms, as well as historical records of faunal species occurrence. (See pages IV.C-2 and IV.C-3 of the Draft EIR.) Animal species identified on, or which are potentially present on the Project Site are presented in Appendices A and B to the General Biological Assessment, attached as Appendix C-1 to the Draft EIR. Also included within Appendix C to the Draft EIR are the following survey reports: Presence/Absence Report for the California Gnatcatcher; Presence/Absence Reports for Least Bell’s Vireo (2008 and 2006); Small Mammal Trapping Program; Diurnal Raptor Surveys; Rare
III. Responses to Comments

A detailed discussion of the draft Griffith Park wildlife surveys being prepared for Griffith Park by Cooper Ecological Monitoring and sponsored by the City Department of Recreation and Parks, which were in draft form at the time the analysis in the Draft EIR was prepared and/or are ongoing, is beyond the scope of the Draft EIR. However, the Draft Griffith Park Wildlife Management Plan, dated February 2008, which was attached to the Greater Griffith Park Neighborhood Council’s December 2008 comment letter in response to the Notice of Preparation of the Draft EIR, is included in Appendix A to the Draft EIR. Further, as noted above, the evaluation of animal species potentially present on the Project Site included consideration of habitat requirements and preferences, and the known distribution of species, including occurrences within Griffith Park. For example, the coast horned lizard was determined to have a high probability of occurrence on the Project Site (and therefore assumed to be potentially impacted by the Project as explained above). As noted in the General Biological Assessment, suitable to favorable habitat for the coast horned lizard is present on the Project Site, and the species was recently detected in Griffith Park. (See page 53 of the General Biological Assessment, attached as Appendix C-1 to the Draft EIR.)

Comment No. 24-4

3. The DEIR minimizes the importance of riparian habitat. The proposed project would adversely impact approximately eight acres of streambed habitat. Two creeks in close proximity to one another, Sennett Creek and Royce Creek, are home to countless animal and botanical wildlife and the ecological damage to Sennett Creek could have an adverse impact on Royce Creek, even if Royce Canyon is beyond the project boundary. Furthermore, disruption of riparian corridor may also alter the migration of animals to and from the Los Angeles River.

Response to Comment No. 24-4

The comment discusses the Project’s impacts to riparian habitat and suggests that ecological damage to Sennett Creek could have an adverse impact on Royce Creek, even if Royce Canyon is beyond the Project boundary. The comment also suggests that disruption of this riparian corridor may alter the migration of animals to and from the Los Angeles River. As the Draft EIR explains on page IV.C-20, Sennett Creek originally was comprised of oak/sycamore dominated riparian woodland that stretched from the Los Angeles River upward into what is now called Royce’s Canyon in Griffith Park. Prior to 1940, Sennett Creek was one of many ecologically functional tributaries to the Los Angeles River. With the channelization of the Los Angeles River, Sennett Creek has been truncated. Portions of the creek have been affected by historic development of the Project Site as well; however, those previously affected sections have been largely restored and
are now comprised of mixed willow riparian scrub intermixed with newly established sycamores, cottonwoods, and coast live oaks. (See Section IV.C, Biological Resources, of the Draft EIR, page IV.C-20.) Currently, Sennett Creek provides habitat and cover for riparian-dwelling and stream-dependent organisms, but it has no direct ecological connection with the Los Angeles River, as it once did. As such, it provides a water source and a movement area for animals like mule deer, long-tailed weasel (Mustela frenata), bobcat (Lynx rufus) and northern raccoon; however, its functions with regard to connectivity into greater Los Angeles River–associated habitats have been largely eliminated due to the current condition of the River and the extensive conversion of habitats throughout the San Fernando Valley. Moreover, regulatory status organisms that once might have used the river to access other tributary stream systems (such as anadromous fish species, California red-legged frog [Rana draytonii], and regulatory status small mammals like Los Angeles pocket mouse [Perognathus longimembris brevinasus] and perhaps kangaroo rats [Dipodomys spp.]) now are in decline or absent. Therefore, while organisms now present in the area most likely do venture into Sennett Creek for water and for cover, they do not do so in a manner consistent with the actual role of wildlife corridors. (See page IV.C-22 of the Draft EIR.)

The analysis in the Draft EIR addresses riparian habitat and its importance. As explained in detail in the General Biological Assessment, attached as Appendix C-1 to the Draft EIR, woodland communities in cismontane Southern California occur where increased soil moisture allows trees and tree canopies to develop. On south-facing exposures, this phenomenon occurs most frequently in close proximity to streams and in canyons shaded from solar penetration. On north-facing slopes and exposures, such as those found on the Project Site, woodlands tend to exhibit their highest diversity in association with streams. Due primarily to aspect (solar angle) and sometimes other various edaphic (soil) conditions, north-slope woodlands are generally dominated by coast live oak trees not dependent directly on stream-associated moisture. When mature, these woodlands establish a sustainable and complex microclimate. Numerous moisture-dependent shrubs, annual plant species and woodland-dependent wildlife thrive within the relatively moderate temperature regime as compared to adjacent scrub, grassland and chaparral communities. Deep forest soil and forest litter profiles can develop, fostered by microclimatic conditions and enhanced over time by the tree canopy and associated protective elements. The combination of the tree canopy, high amount of overall biomass, deep heterogeneous organic soil layers, prevalence of shade, soil moisture and downed wood, provides a unique and stable habitat for larger mammal, amphibian, avian and invertebrate species. (See page 25 of the General Biological Assessment for Forest Lawn Memorial-Park, Hollywood Hills.)

The proposed Project has the potential to permanently impact 7.83 acres of California Department of Fish and Game (CDFG) streambeds on-site. Most of the impacts that would occur in connection with Project implementation would be associated with tributary drainages to Sennett Creek and Drainage L. Sennett Creek would be largely left
intact. Approximately 0.33 acre of CDFG jurisdictional streambeds (a subset of the 7.83-acre total referenced above) would be impacted by the proposed culvert crossing in Sennett Creek. (See page IV.C-38 of the Draft EIR.) The proposed culvert crossing would be similar in design to existing crossings and is necessary for proper traffic movement and circulation within the Project Site. Potential impacts of the proposed crossing would be reduced to a less-than-significant level with implementation of the proposed mitigation measures, in particular the acre of restoration in a degraded area adjacent to Sennett Creek pursuant to Mitigation Measure C-5, which is set forth on page IV.C-47 of the Draft EIR.

As explained in the Draft EIR, the proposed Project would impact approximately 12 acres of riparian-associated habitats (e.g., western sycamore/coast live oak, western sycamore/willow riparian forest, southern willow scrub, mulefat scrub, southern willow scrub/mulefat scrub, and disturbed mulefat scrub) on the Project Site. Most of the Sennett Creek tributaries which would be affected by Project development do not contain surface water during summer months, although the lower reaches of Sennett Creek appear to support surface water each year. During summer months when water is scarce and found mostly in lower elevation areas, the preservation of Sennett Creek should provide adequate water resources. Though approximately 12 acres of riparian-associated habitat would be removed and animal movement through several drainages on the Project Site would be impeded with implementation of the proposed Project, the proposed Project would not create a substantial barrier to animal movement given the small area of the larger habitat complex that would be affected. Furthermore, the existing impaired connectivity to the Los Angeles River via Sennett Creek and its tributaries, which provide habitat and cover but no longer have direct ecological connection with the Los Angeles River, as discussed above, would remain in place. Implementation of the proposed mitigation measures described in Section IV.C of the Draft EIR, including Mitigation Measures C-1 through C-6, C-10 through C-16, and C-18 through C-19, would be expected to further reduce impacts, resulting in an overall impact with respect to animal movement that would not be significant. (See page IV.C-40 of the Draft EIR.)

Comment No. 24-5

4. The DEIR dismisses the cumulative impacts of the nearby proposed and ongoing projects. The DEIR makes scant mention of such projects as the NBC-Universal project and the headworks project. For example, the NBC-Universal project is expected to greatly increase the amount of traffic and noise, light, and pollution along Forest Lawn Drive. These impacts could disrupt the relative bucolic environment to which the wildlife is accustomed. Combined with the acknowledged loss of habitat of the proposed project and any of the alternatives, wildlife will be further and further marginalized and forced into ever-restrictive corridors and habitat. The DEIR does not address the cumulative impact of these projects.
Response to Comment No. 24-5

The Los Angeles Department of Water and Power’s Headworks project (also known as the Silver Lake Reservoir Complex Storage Replacement Project) and the NBC Universal Evolution Plan are included in the list of related projects provided on page III-29 of Section III, Environmental Setting of the Draft EIR, and their location in relation to the Project Site is depicted on Figure III-1, Related Projects Location Map, on page III-28 of the Draft EIR. These are two of the eight related projects listed in the Draft EIR, which are accounted for in the cumulative impact analysis provided in the environmental impact analysis sections within Chapter IV of the Draft EIR. Potential cumulative impacts to traffic, noise, light, air quality, and biological resources associated with the Proposed Project and related projects are addressed in Sections IV.J, Traffic, Circulation and Parking (on page IV.I-32); IV.I, Noise (on page IV.I-32); IV.A, Aesthetics (on page IV.A-44); IV.B.1, Air Quality (on page IV.B-27); and IV.C, Biological Resources (on page IV.C-43). Pursuant to the CEQA Guidelines, the discussion of cumulative impacts “need not provide as great detail as is provided for the effects attributable to the project alone...[and] should be guided by the standards of practicality and reasonableness.” (CEQA Guidelines, Section 15130.)

With regard to traffic, as discussed in Section IV.J, Traffic, Circulation and Parking, operation of the Project would generate negligible, if any new trips. Since the Project’s incremental contribution to the cumulative impact on traffic would be very minor, if any (specifically, less than half of the 500-daily-trip threshold that triggers an expanded traffic analysis pursuant to the City of Los Angeles CEQA Thresholds Guide), it would not result in a significant cumulative effect. With regard to construction traffic, the Project’s construction-related traffic impacts would be less than significant. In addition, as set forth in Section II, Corrections and Additions to this Final EIR, the Applicant has incorporated a project design feature that would limit off-site hauling of soil during the peak traffic hours and provides for the hauling of excavated soil from the Project site to occur primarily at night.

With regard to noise, as discussed in Section IV.I, Noise, of the Draft EIR, operation of the Project would not change the various types of activities that occur within the Project Site. In addition, due to their distance from the Project Site and the types of uses proposed, the related projects are not anticipated to generate a substantial increase in noise levels within the vicinity of the Project Site. Accordingly, long-term operational noise and vibration impacts would not be cumulatively considerable. With regard to construction noise, no Project construction activities would occur in close proximity sensitive receptors. In addition, Mitigation Measure I-1 through Mitigation Measure I-4 have been proposed to reduce Project-related noise impacts from construction activities to less-than-significant levels. Furthermore, Project-related haul trucks would not utilize the westernmost entrance to the Project Site. Thus, Project-related haul trucks would not pass by nearby residential areas. Overall, the contribution of the Project to potential cumulative construction impacts would not be cumulatively considerable.
With regard to lighting, the proposed Project would incorporate directional lighting fixtures to be used to highlight architectural features and for pedestrian safety and security purposes. Light trespass is not anticipated to travel beyond the Project Site. In addition, due to the topography of the Project Site, the open space nature of land uses in the adjacent hillside areas, and the relatively isolated views created by the open space hillsides to the south, no related projects have been identified within the proximate viewshed of the Project Site. As such, the proposed Project would not result in adverse light impacts, that when combined with effects from other projects would be cumulatively considerable.

With regard to air quality, the SCAQMD recommends that individual projects that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. The SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to Federal Clean Air Act mandates. As such, the Project would comply with SCAQMD Rule 403 requirements. In addition, the Project would comply with adopted AQMP emissions control measures. Per SCAQMD rules and mandates as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, these same requirements (i.e., Rule 403 compliance, the implementation of all feasible mitigation measures, and compliance with adopted AQMP emissions control measures) would also be imposed on construction projects Basin-wide, which would include each of the related projects mentioned above. From an operational standpoint, the Project would result in a minimal increase in daily vehicular trips and a small increase in regional emissions associated with electricity and natural gas usage for the increase in building square footage. As shown in Tables IV.B-6 and IV.B-7 of the Draft EIR, peak daily emissions of operation-related pollutants were well below the SCAQMD regional and localized significance thresholds (i.e., approximately 1.9 percent of the VOC threshold, 7.6 percent of the NO\textsubscript{x} threshold, and 0.1 percent of the SO\textsubscript{x}, PM\textsubscript{10}, and PM\textsubscript{2.5} thresholds). Based on the above information, construction and operation-related daily emissions at the Project Site would not exceed any of the SCAQMD's regional or localized significance thresholds and, therefore, cumulative air quality impacts were concluded to be less than significant in the Draft EIR.

As explained in the cumulative impacts discussion in the Biological Resources Section of the Draft EIR, although Griffith Park and other undeveloped lands are directly south, east and west of the Project Site, the other surrounding areas are highly urbanized and would be rarely used by wildlife other than those adapted to urban environments. The functional natural habitat within the Project Site is at the edge of the Hollywood Hills/Griffith Park habitat complex, and the 70.42 acres of natural areas on the Project Site that would be impacted by the proposed Project comprise just 1.9 percent of the approximate 3,700-acre area of remnant natural habitat in the easternmost Santa Monica Mountains. Thus, the Project Site does not function as a “macro-corridor” for biological resources. The Project Alternatives would impact a lesser amount of the natural vegetation communities on-site than the proposed Project, as discussed in Section VI, Alternatives, of the Draft
III. Responses to Comments

EIR, and thus a lesser percentage of the total natural area. This relatively small area that would be affected by the proposed Project (in comparison to the approximately 3,700-acre habitat block) would support a proportionally small amount of wildlife movement. Thus, barriers or impediments to movement in this small area would not preclude or eliminate animal movement on the north slope of the Santa Monica Mountains/Hollywood Hills, and impacts associated with wildlife movement would be less than significant. (See pages IV.C-39 through IV.C-40 of the Draft EIR.) Further, the 3,700-acre block of relatively natural habitat is, in itself, largely isolated, lacking any connective habitat to natural areas west of the Hollywood Freeway. Nor have corridors or critical pathways for terrestrial wildlife been identified. While birds and highly mobile animals may be able to traverse the Cahuenga Pass, the Project Site is not considered to be a major wildlife movement corridor, especially given the highly urbanized condition of its surroundings. (See page IV.C-43 of the Draft EIR.) As discussed in the Draft EIR, the proposed Project would not have a significant impact on biological resources (including vegetation communities, regulatory status animal or plant species, protected trees, or jurisdictional features) with implementation of the proposed mitigation program. Any impacts to biological resources similar to those impacted by the proposed Project as a result of the related projects would likely be subject to mitigation, resulting in less-than-significant impacts for those related projects as well. (See page IV.C-43 of the Draft EIR.) Thus, the Project’s potential cumulative impacts with respect to biological resources would be less than significant.

Comment No. 24-6

5. The DEIR suggests that the destruction of over 800 ancient oaks and other trees can be mitigated by the planting of acorns and seedlings elsewhere, and not necessarily within the project boundary. This is patently absurd, These trees are at once the haven for an enormous variety of wildlife, a guardian against erosion, and a majestic ambience for all to admire. They are the linchpin of the ecosystem, While the suggested alternatives respectively impact fewer and fewer trees, the loss of any of these magnificent trees would be a tragedy, both in terms of biology and aesthetics.

Thank you for your consideration.

Response to Comment No. 24-6

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. With respect to the removal of protected trees, Mitigation Measure C-9, set forth on pages IV.C-49 through IV.C-51 of the Draft EIR, describes the oak tree replacement ratios that are based upon the diameter of trees to be removed and range from 2:1 up to 15:1, as well as other mitigation measures relating to protected trees. Mitigation Measure C-9.a provides that replacement trees may be planted either on the Project Site or off-site, and may be planted in connection with the creation, restoration, and/or enhancement of habitat required pursuant
to other Project mitigation measures. For example, Mitigation Measure C-3 requires the creation of eight acres of graded slopes on-site to be planted with coast live oak and/or Southern California black walnut trees. (See page IV.C-46 of the Draft EIR.) Mitigation Measures C-4 and C-5, which require the on-site creation/restoration of riparian habitat, requires western sycamore to be used as a dominant element for planting within the mitigation areas. (See pages IV.C-46 through IV.C-47 of the Draft EIR.) Thus, while not all tree replacements may be feasible to be implemented on-site, a substantial number of tree replacements will be implemented on-site with the goal of providing habitat benefit to the wildlife that occurs within and adjacent to the Project Site and aesthetic value to the on-site and off-site mitigation areas.

With respect to the use of acorns and seedlings, in a habitat creation or restoration environment, acorns and seedlings are consistently much more successful than larger box trees. Restoration biologists and ecologists widely recognize that smaller material does much better over time than larger material planted for aesthetic purposes. Smaller material is easily derived from local genetic sources rather than imported as a larger tree from distant nurseries. Locally derived material often is especially adapted for micro-climatic conditions which increases survivability of saplings. Smaller material has the opportunity to root effectively after planting, which provides the new sapling with the following advantages: (i) higher root-versus-crown biomass (i.e., the roots are more fully developed to support the portion of the tree aboveground), which allows greater water and nutrient uptake for aboveground foliage; (ii) better anchoring for trees during wind events with less wind resistance aboveground to prevent toppling; and (iii) greater adaptability to soil conditions.
Comment Letter No. 25

Gary Hickman
Junior Achievement of Southern California, Inc.
6250 Forest Lawn Drive
Los Angeles, CA  90068
www.jasocal.org

Comment No. 25-1

Junior Achievement is both a supporter and a close neighbor of Forest Lawn-Hollywood Hills. And we could not ask for a better neighbor. As organizations, we share a similar goal in serving the community.

When we first were briefed on Forest Lawn’s plans to add interment space and related facilities, we had some concerns about how it might impact our operations. The traffic information detailed in the Draft EIR shows that trips to and from the cemetery are very stable on a daily and yearly basis because Forest Lawn controls its schedule to assure that no more funerals or events occur than can be comfortably managed. So even though more interment facilities will be added, they will not materially change the daily number of trips, but rather extend the life of the memorial park.

This is good news for those of us who regularly travel on Forest Lawn Drive. This is a well thought-out proposal and worthy of your support.

Response to Comment No. 25-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 26

Donald A. Seligman
President
Los Feliz Improvement Association
P.O. Box 29395
Los Angeles, CA  90029
www.lfia.org

Comment No. 26-1

The Los Feliz Improvement Association (LFIA) representing over a 1,000 households south of Forest Lawn is requesting a forty-five day extension of the review period for the memorial park’s Draft Environmental Impact Report (DEIR). The voluminous report requires more time so that the community can give it the attention it deserves.

LFIA respectfully requests an extension until June 15th.

Response to Comment No. 26-1

The specific procedures and time period for public review of a Draft Environmental Impact Report are mandated by state law in Sections 15087 and 15105 of the CEQA Guidelines. Specifically, Section 15105(a) states: “The public review period for a draft EIR should not be less than 30 days nor longer than 60 days except in unusual circumstances.” Consistent with the requirements of CEQA, the Draft EIR was submitted to the State Clearinghouse, Office of Planning and Research, and was originally circulated for public review for a 45-day period. This 45-day comment period began on February 11, 2011. In response to requests to extend the review period, on March 25, 2011, the City of Los Angeles extended the comment period by an additional 15 days to April 13, 2011. Thus, the Draft EIR was circulated for a 60-day public review period, which exceeds the 45-day public review period required by CEQA Guidelines Section 15105 when a Draft EIR is submitted to the State Clearinghouse for review by State agencies. There were no unusual circumstances identified by the City to warrant an extension beyond the 60-day maximum set by state law in Section 15105(a) of the CEQA Guidelines. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment Letter No. 27

Donald A. Seligman, D.D.S.
President
Los Feliz Improvement Association
P.O. Box 29395
Los Angeles, CA  90029
www.lfia.org

Comment No. 27-1

The Los Feliz Improvement Association appreciates that Forest Lawn has a legal right to develop their land. However, there are some obvious issues that need addressing due to the potential impact on our Los Feliz neighborhood.

We have found two glaring flaws in the Draft Environmental Impact Report (DEIR). The report has minimally acknowledged one of these, but the other is shockingly not recognized.

Response to Comment No. 27-1

The introductory comments are noted and have been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the environmental analysis in the Draft EIR are responded to below.

Comment No. 27-2

1) While the DEIR mentions that the Fish and Game Department (State) and Army Corps of Engineers (Federal) have reservations about the expansion’s impact on the mapped Sennet Creek wildlife migration trail, the agencies are dismissed as only “interested parties” and mitigations are not considered.

Response to Comment No. 27-2

The comment suggests that the Draft EIR mentions that the California Department of Fish and Game (CDFG) and Army Corps of Engineers have reservations about the Project’s impact on Sennett Creek and that the Draft EIR dismisses the resource agencies “…as only ‘interested parties’ and mitigations are not considered.” However, as noted in the Project Description in the Draft EIR, in addition to the discretionary actions requested of the City, the proposed Project would require regulatory permits, including an Individual 404(b) Permit from the Army Corps of Engineers, a 401 Water Quality Certification from the Regional Water Quality Control Board, and a Streambed Alteration Agreement from CDFG.
III. Responses to Comments

(See page II-21 of the Draft EIR.) As the Draft EIR further explains, the City serves as the Lead Agency for the EIR pursuant to CEQA, and a National Environmental Policy Act clearance will also be prepared with respect to the portion of the Project within the Army Corps of Engineers’ jurisdiction, with the Army Corps of Engineers serving as the Lead Agency for that clearance. (See pages II-21 through II-22 of the Draft EIR.)

The Biological Resources section of the Draft EIR, Section IV.C, also includes information about the regulatory framework, including regulations and policies relating to the jurisdiction of the Army Corps of Engineers and CDFG. (See pages IV.C-3 through IV.C-9.) The Draft EIR analysis of potential impacts to biological resources includes detailed descriptions of the regulatory status of streambeds and drainages within the Project Site, the biological resources associated with the regulated streambeds and drainages, and the proposed impact to said resources. In particular, potential resource agency jurisdictional impacts are summarized on pages IV.C-38 through IV.C-39 of the Draft EIR and analyzed in detail in the Preliminary Determination of U.S. Army Corps of Engineers “Waters of the U.S” and Wetlands Jurisdiction and Impact Analysis and Preliminary Determination of California Department of Fish and Game “Streambeds” Jurisdiction and Impact Analysis reports, attached to the Draft EIR as Appendices C-7 and C-8, respectively. In addition, the Draft EIR notes that an Application for Department of the Army Permit for the Project was submitted to the Army Corps of Engineers in November 2010, and it is attached to the Draft EIR as Appendix C-15. Similarly, the Draft EIR notes that a Notification of Streambed Alteration for the Project was submitted to CDFG in November 2010, and it is attached to the Draft EIR as Appendix C-14. Furthermore, Mitigation Measures C-1 through C-20, set forth on pages IV.C-44 through IV.C-53 of the Draft EIR, describe mitigation measures with respect to biological resources, including those subject to the jurisdiction of the Army Corps of Engineers and CDFG, that have been considered and included in the Draft EIR. In addition, Mitigation Measure C-21, set forth on page C-54 of the Draft EIR, requires Forest Lawn to obtain all necessary permits from the Army Corps of Engineers, CDFG, and the Regional Water Quality Control Board, as applicable, prior to the issuance of grading permits for the Project.

Comment No. 27-3

2) The DEIR’s evaluation of the project’s impact on traffic is highly misleading and its conclusion that the expansion has a “neutral” trip impact because people visit cemeteries primarily on weekends is totally flawed. Forest Lawn Drive is already a terrible choke point both at Barham due to Universal Studios and the 134 Freeway eastbound/westbound access due to park usage. In fact, weekends are the most congested period, so any increased usage due to additional Forest Lawn visitors on weekends can only aggravate, not alleviate the traffic problems.
Response to Comment No. 27-3

The comment suggests that the Draft EIR’s evaluation of potential traffic impacts associated with the Project is misleading and that the conclusion that the Project has a neutral trip impact because people visit cemeteries primarily on weekends is flawed. However, contrary to the comment’s suggestion, the Draft EIR’s conclusions regarding Project trip generation are not based on weekend visitation. As explained in the Draft EIR, Section IV.J, Traffic, Circulation, and Parking, the daily average number of interments at the Project Site has remained approximately the same for the past 13 years. The number of visitors to cemeteries is directly correlated to the amount and rate of annual interments. The death rate in Los Angeles County has also remained relatively unchanged for many years. However, even if the death rate in Los Angeles County were to increase, the daily and/or monthly amount of interments at the Project Site would not increase due to existing logistical constraints at the facility. (See page IV.J-10 of the Draft EIR.) As the Draft EIR further explains, available traffic count data indicates that the daily traffic volume on Forest Lawn Drive remained stable for the 7.5-year period ending in April 2007. Therefore, although the Project will provide approximately 200,000 additional interment sites, the level of daily interment activity is expected to continue to be stable over the life of the Project, as it has been for over the last 13 years. Furthermore, the new interment sites will be developed and used within the undeveloped areas of the Project Site over an extended period of time, from 2011 to 2050 and beyond, in order to meet the regional demand for new interment sites as the existing supply of interment space is depleted. Based on the stability in the number of interments that have occurred at the Forest Lawn Memorial-Park–Hollywood Hills property over the last decade, trip generation is expected to continue to be stable over the life of the Project. No additional growth in trip generation beyond current levels is anticipated. Accordingly, the Draft EIR concluded that no increase in trip generation, including with the Project, is anticipated. The assumptions and methodology presented in the Draft EIR on pages IV.J-10 through IV.J-13 regarding the Project’s trip generation and operational impacts were evaluated and approved by the Los Angeles Department of Transportation. In order to provide a conservative analysis, the Draft EIR assumed a hypothetical growth rate of one percent over each five-year period. Thus, assuming this hypothetical growth, toward the build-out of the Project, the Project would generate an additional 239 trips per day, including 9 A.M. and 21 P.M. peak-hour trips. (See page IV.J-11 of the Draft EIR.) Most interments do not occur during the morning or evening traffic peak periods. Based on the City of Los Angeles CEQA Thresholds Guide, if a project generates less than 500 daily trips and less than 43 trips in the P.M. peak hour, there would be no significant impacts on the street segment. The trip-generation estimates for the Project are minor and well below the City’s criteria for triggering project traffic studies. The trip-generation estimates for the Project would not result in significant traffic impacts on a weekday or weekend day. Further, as the Draft EIR notes on page IV.J-12, the Project Site’s weekday peak trip generation generally occurs between the off-peak traffic hours of 10:00 A.M. and 3:00 P.M. and does not impact traffic during the typical commute hours when traffic volumes are greater. This pattern is expected to continue with
the Project. The comment is noted and will be incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 27-4**

In addition, the Forest Lawn expansion proposal in conjunction with the proposed Universal Studio development and the Headworks LADWP storage project currently underway will make Forest Lawn Drive, a major commuter artery, practically impassable during years of construction, not to mention the weekends when Griffith Park and Universal Studios are attracting large crowds. There is a lack of infrastructure to support what will, in fact, be a major impact on a narrow, freeway and mountain [sic] locked east/west artery and the inevitable result will be a significant traffic spillover into Griffith Park.

**Response to Comment No. 27-4**

The comment addresses cumulative impacts with respect to Forest Lawn Drive and suggests that there is a lack of infrastructure to support a major traffic impact that will result in significant traffic spillover into Griffith Park. As noted in the Draft EIR and in Response to Comment No. 27-3 above, the Project would generate negligible, if any, new trips. Because the Project’s incremental contribution to the cumulative impact on traffic would be very minor (specifically, less than half of the 500-daily-trip threshold that triggers an expanded traffic analysis pursuant to the *City of Los Angeles CEQA Thresholds Guide*), it would not result in a significant cumulative effect. (See page IV.J-14 of the Draft EIR.) Pursuant to the *CEQA Guidelines*, “cumulative impacts” refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. (*CEQA Guidelines*, Section 15355.) An EIR must discuss cumulative impacts of a project when the project’s incremental effect is cumulatively considerable (i.e., significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probably future projects). (*CEQA Guidelines* Sections 15130 and 15065(a)(3).) The incremental effect of the Project, if any, would not be cumulatively considerable. In addition, other development projects would be evaluated on a case-by-case basis and mitigation measures would be implemented individually in coordination with the City. The Project would not result in a significant impact related to accessibility, including emergency access. With respect to each of these areas, the design of each related development project would be evaluated individually in coordination with City, the Fire Department, and the Police Department to minimize any potential impacts. Overall the Project’s cumulative traffic and circulation impacts would be less than significant. (See page IV.J-14 of the Draft EIR.) In addition, as set forth in Subsection IV.J, Traffic and Circulation of Section II, Corrections and Additions, of this Final EIR, a project design feature has been incorporated that would limit off-site hauling of soil during peak traffic hours and provides for the hauling of excavated soil from the Project Site to occur primarily at night.
Comment No. 27-5
Our greatest concern is that this situation will once again stimulate consideration of wide boulevards in the park to accommodate the area’s greater densification, thus usurping valuable natural and user areas in the park.

Response to Comment No. 27-5
The comment is noted and will be incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. However, as noted in Response to Comment No. 27-3 above, the Project’s additional trip generation, if any, would be negligible and, accordingly, would not warrant widening of roadways within Griffith Park. As noted in Response to Comment No. 27-4, the Project’s incremental effect would not be cumulatively considerable, and, therefore, the Project’s potential cumulative traffic and circulation impacts would also be less than significant and would not warrant widening of roadways within Griffith Park.

Comment No. 27-6
We have only been able to complete a cursory reading of the DEIR at this point. Yet these glaring omissions are obvious, and there are likely additional issues of great concern. This suggests that there is an inexcusable lack of strategic planning by the city when they do not address the combined impact of the Forest Lawn and Universal Studio expansions and the LADWP Headworks storage project.

Response to Comment No. 27-6
The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. As discussed in Response to Comment No. 24-4, contrary to the comment’s suggestion, the Draft EIR does address the potential cumulative impacts associated with the Project, the NBC Universal project, and the LADWP Headworks project.

Comment No. 27-7
The disingenuous oversight of the Forest Lawn traffic study which concludes no traffic impact at all is either ignorant of the facts or misleading.

Response to Comment No. 27-7
The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Please refer to Response to Comment No. 27-3 above with respect to the traffic analysis in the Draft EIR.
Comment No. 27-8

Either way, there are likely additional issues which are very important to the community, and to restrict the public review period of this very large document to only 60 days is an affront to our constituents. Once again, we strongly ask your help in extending the review and comment period to at least the end of April or longer.

Response to Comment No. 27-8

The specific procedures and time period for public review of a Draft Environmental Impact Report are mandated by state law in Sections 15087 and 15105 of the CEQA Guidelines. Specifically, Section 15105(a) states: “The public review period for a draft EIR should not be less than 30 days nor longer than 60 days except in unusual circumstances.” Consistent with the requirements of CEQA, the Draft EIR was submitted to the State Clearinghouse, Office of Planning and Research, and was originally circulated for public review for a 45-day period. This 45-day comment period began on February 11, 2011. In response to requests to extend the review period, on March 25, 2011, the City of Los Angeles extended the comment period by an additional 15 days to April 13, 2011. Thus, the Draft EIR was circulated for a 60-day public review period, which exceeds the 45-day public review period required by CEQA Guidelines Section 15105 when a Draft EIR is submitted to the State Clearinghouse for review by State agencies. There were no unusual circumstances identified by the City to warrant an extension beyond the 60-day maximum set by state law in Section 15105(a) of the CEQA Guidelines. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment Letter No. 28

Donald A. Seligman, D.D.S.
President
LFIA
donalds261@aol.com

Comment No. 28-1 (Correspondence regarding Draft EIR Public Review Period)

Email 1: Please see attached.

Attachment to Email 1: The Los Feliz Improvement Association (LFIA) representing over a 1,000 households south of Forest Lawn is requesting a forty-five day extension of the review period for the memorial park’s Draft Environmental Impact Report (DEIR). The voluminous report requires more time so that the community can give it the attention it deserves.

LFIA respectfully requests an extension until June 15th.

Response from City: The public comment period for the Forest Lawn Memorial Park-Hollywood Hills Master Plan has been extended by an additional 15 days to Wednesday, April 13, 2011. A revised Notice of Preparation with the new closing date will be distributed shortly.

Email 2: The Los Feliz community will be impacted by this proposal, and our next Los Feliz Improvement Association Board meeting will not meet again until the end of April, nearly 2 weeks after your extended deadline. This will make it impossible for our Zoning Committee to consider the Master Plan and make recommendations to our Board for an official position. We requested a 45 day extension of the deadline, which is reasonable given the size of the Master Plan and the impact on the community. Your 15 day extension is totally unacceptable and will effectively eliminate community input. Please reconsider your decision and grant the extension we originally requested.

Response 2 from City: The procedures and time period for public review of a Draft Environmental Impact Report are set by state law in Sections 15087 and 15105 of the Guidelines for California Environmental Quality Act (California Code of Regulations, Title 14, Chapter 3). Specifically, Section 15105(a) states that “The public review period for a draft EIR should not be less than 30 days nor longer than 60 days except in unusual circumstances.”

Following this directive, the City of Los Angeles Department of City Planning typically sets a public review period of 45 days for Draft EIRs, the midpoint between the minimum and
III. Responses to Comments

maximum review period. The public review period for the Forest Lawn Memorial Park–
Hollywood Hills Master Plan project’s Draft EIR was originally set at the standard 45 days,
but in response to letters received from community groups and the City Council office, this
period was extended by 15 days as a courtesy. There were no unusual circumstances
identified to warrant an extension beyond the 60-day maximum set by state law in Section
15105(a) of the CEQA Guidelines.

A revised Notice of Preparation will be distributed shortly reflecting the new public comment
due date of Wednesday, April 13. We look forward to seeing any comments you may have
regarding the analysis presented in the Draft EIR.

Email 3 from Ron Ostrow Responding to City email to The Los Feliz Improvement
Association President : Again, thank you for your response. I guess we have a different
interpretation of what constitutes unusual circumstances. The fact that the DEIR is so large
and that three major constituent groups plus their councilman have requested to exceed
the 60 days would seem to meet the definition of unusual.

That’s without taking into account that without an extension beyond April 19th, the date of
our neighborhood council’s next public meeting, the GGPNC can’t even discuss whether
our neighborhood might have any comments to make. We only received the CD Rom days
prior to our Feb. meeting and our committees haven’t finished their review.

From where I sit, this all seems more than sufficient to meet a test of unusual.

I believe we all share the common goal of serving the public interest. Surely, we can agree
that granting a 30 day extension, while outside of statute, serves the public without putting
any undue hardship on any other body.

Therefore, one last time, I am urging you to reconsider.

Response 3 from City: The 15-day extension decision comes from Michael LoGrande,
the Director of Planning. Sorry; we can’t go any farther than April 13.

Since CEQA requires a DEIR review period of between 30 and 60 days except in unusual
circumstances, the majority of EIR cases will have similar parameters for their comment
periods.

Response to Comment No. 28-1

The specific procedures and time period for public review of a Draft Environmental
Impact Report are mandated by state law in Sections 15087 and 15105 of the CEQA
Guidelines. Specifically, Section 15105(a) states: “The public review period for a draft EIR should not be less than 30 days nor longer than 60 days except in unusual circumstances.” Consistent with the requirements of CEQA, the Draft EIR was submitted to the State Clearinghouse, Office of Planning and Research, and was originally circulated for public review for a 45-day period. This 45-day comment period began on February 11, 2011. In response to requests to extend the review period, on March 25, 2011, the City of Los Angeles extended the comment period by an additional 15 days to April 13, 2011. Thus, the Draft EIR was circulated for a 60-day public review period, which exceeds the 45-day public review period required by CEQA Guidelines Section 15105 when a Draft EIR is submitted to the State Clearinghouse for review by State agencies. There were no unusual circumstances identified by the City to warrant an extension beyond the 60-day maximum set by state law in Section 15105(a) of the CEQA Guidelines. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment Letter No. 29

Joseph F. Young
Chair, Griffith Park Task Force
Angels Chapter
Sierra Club,
3435 Wilshire Blvd., Ste. 320
Los Angeles, CA  90010-1904
www.angeles.sierraclub.org
12551 Presnell St.
Los Angeles, CA  90066-6730

Comment No. 29-1

The Sierra Club has received the subject Draft Environmental Report.

We observe that the DEIR consists of six volumes, 3,300 pages, and weighs twenty one pounds. The DEIR raises many issues relative to wildlife, wildlife corridors, biological resources, aesthetics, and the cumulative impact of a number of projects already underway or planned to begin soon.

The DEIR was released for review and comment in February 2011. According to the DEIR, the public has forty five days to comment.

This is an inadequate review time frame. The issues are far too complex to be properly reviewed in forty five days.

The Sierra Club requests an extension of ninety days in order to respond to the DEIR.

Response to Comment No. 29-1

The specific procedures and time period for public review of a Draft Environmental Impact Report are mandated by state law in Sections 15087 and 15105 of the CEQA Guidelines. Specifically, Section 15105(a) states: “The public review period for a draft EIR should not be less than 30 days nor longer than 60 days except in unusual circumstances.”

Consistent with the requirements of CEQA, the Draft EIR was submitted to the State Clearinghouse, Office of Planning and Research, and was originally circulated for public review for a 45-day period. This 45-day comment period began on February 11, 2011. In response to requests to extend the review period, on March 25, 2011, the City of Los Angeles extended the comment period by an additional 15 days to April 13, 2011. Thus, the Draft EIR was circulated for a 60-day public review period, which exceeds the 45-day public review period required by CEQA Guidelines Section 15105 when a Draft EIR is
submitted to the State Clearinghouse for review by State agencies. There were no unusual circumstances identified by the City to warrant an extension beyond the 60-day maximum set by state law in Section 15105(a) of the CEQA Guidelines. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment Letter No. 30

Joseph F. Young  
Chair, Griffith Park Task Force  
Angeles Chapter  
Sierra Club,  
3435 Wilshire Blvd., Ste. 320  
Los Angeles, CA 90010-1904  
www.angeles.sierraclub.org  
12551 Presnell St.  
Los Angeles, CA 90066-6730

Comment No. 30-1

The Sierra Club has reviewed the subject Draft Environmental Report and makes the following comments.

The DEIR was released for review and comment in February 2011. The Comment period was said to end March 29, 2011, a short time frame to adequately review this document. The fifteen day extension granted is only partly helpful. Therefore, although this letter includes initial comments about a number of issues raised by the DEIR, the Sierra Club will be continuing its analysis of the DEIR and we may file additional comments.

Response to Comment No. 30-1

The specific procedures and time period for public review of a Draft Environmental Impact Report are mandated by state law in Sections 15087 and 15105 of the CEQA Guidelines. Specifically, Section 15105(a) states: “The public review period for a draft EIR should not be less than 30 days nor longer than 60 days except in unusual circumstances.” Consistent with the requirements of CEQA, the Draft EIR was submitted to the State Clearinghouse, Office of Planning and Research, and was originally circulated for public review for a 45-day period. This 45-day comment period began on February 11, 2011. In response to requests to extend the review period, on March 25, 2011, the City of Los Angeles extended the comment period by an additional 15 days to April 13, 2011. Thus, the Draft EIR was circulated for a 60-day public review period, which exceeds the 45-day public review period required by CEQA Guidelines Section 15105 when a Draft EIR is submitted to the State Clearinghouse for review by State agencies. There were no unusual circumstances identified by the City to warrant an extension beyond the 60-day maximum set by state law in Section 15105(a) of the CEQA Guidelines. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the environmental analysis in the Draft EIR are responded to below.
Comment No. 30-2

Wildlife [sic] Movement

The DEIR states that “much of the area around the Project Site is urbanized… [t]here is, however, an ‘island’ of natural open space…” The size of the “island” is said to be 3,600 acres of which the Project Site comprises “only” 120 acres. This characterization is misleading. The western extremity of Griffith Park includes lands between Lake Hollywood and Forest Lawn, a relatively narrow strip of land, but yet wildlife surveys have indicated that this land provides a corridor for numerous species. The DEIR itself notes that Griffith Park itself is part of the Santa Monica Mountains. Wildlife surveys have shown that Griffith Park shares habitat range with the rest of the Santa Monica Mountains. However, the DEIR does not fully acknowledge the findings of these surveys.

It is this corridor that would be impacted by the proposed development. Describing the 120 acres proposed to be developed as a “small fraction” of the actual wildlife corridor is inaccurate and misleading. The 120 acres would indeed significantly diminish the wildlife corridor that exists in the western extension of Griffith Park.

Response to Comment No. 30-2

The comment states that the Draft EIR mischaracterizes Griffith Park and the area around the Project Site as an “island” that is largely isolated. The Draft EIR describes an “island” of natural open space consisting of approximately 3,700 acres south of State Highway 134, east of Barham Boulevard, west of Interstate 5, and north of the southern boundary of Griffith Park. As the Draft EIR explains, in addition to Griffith Park natural areas, this area includes undeveloped areas of the Project Site, and other privately owned properties in the Cahuenga Peak/Mt. Lee area and is surrounded by the developed urban area. (See Section IV.C, Biological Resources, of the Draft EIR, page IV.C-20.) The Draft EIR notes that this area of natural habitat is largely isolated, with no connective habitat to natural areas west of the Hollywood Freeway, and that no discernable corridors or critical pathways for terrestrial wildlife have been identified. (See page IV.C-39 of the Draft EIR.) The Draft EIR describes the south and north slopes of the Hollywood Hills and notes that habitat generalists such as mule deer and coyote move freely between the various community types. (See Draft EIR page IV.C-20.) In addition, the Draft EIR notes that a number of common, urban-adapted species, such as Virginia opossum, northern raccoon, mule deer, and coyote, can be found outside of the natural habitat block within the developed/cemetery portion of the Project Site, which contains low levels of evening light, closes at night, and provides urban-tolerant species with foraging area. (See page IV.C-19 of the Draft EIR.) The issue of connectivity between the Griffith Park habitat block and the Santa Monica Mountains to the west was summarized in the Draft EIR (See, Section IV.C.2.b(6), Wildlife Movement, page IV.C-20) and discussed in detail in the General Biological Assessment, attached as Appendix C-1 to the Draft EIR. The analysis
III. Responses to Comments

acknowledges that the Griffith Park habitat block is relatively porous for a number of organisms, including most resident bird species and mobile terrestrial organisms. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

As the Draft EIR explains, the natural habitat on the Project Site comprises approximately three percent of the total natural area in the eastern Santa Monica Mountains. The proposed Project would impact 70.42 acres, or 1.9 percent, of the total natural area east of the Hollywood Freeway. This relatively small area (in comparison to the approximately 3,700-acre habitat block) would support a proportionally small amount of wildlife movement. Thus, barriers or impediments to movement in this small area would not preclude or eliminate animal movement on the north slope of the Santa Monica Mountains/Hollywood Hills, and impacts associated with wildlife movement would be less than significant. (See pages IV.C-39 and IV.C-40 of the Draft EIR.)

A detailed discussion of the draft Griffith Park wildlife surveys being prepared for Griffith Park by Cooper Ecological Monitoring and sponsored by the City Department of Recreation and Parks, which were in draft form at the time the analysis in the Draft EIR was prepared and/or are ongoing, is beyond the scope of the Draft EIR. However, the Draft Griffith Park Wildlife Management Plan, dated February 2008, which was attached to the Greater Griffith Park Neighborhood Council's December 2008 comment letter in response to the Notice of Preparation of the Draft EIR, is included in Appendix A to the Draft EIR. Further, as noted above, the evaluation of animal species potentially present on the Project Site included consideration of habitat requirements and preferences, and the known distribution of species, including occurrences within Griffith Park.

Comment No. 30-3

The DEIR correctly states that “Sennett Creek provides habitat and cover for riparian-dwelling and stream-dependent organisms…” However, the sensitive relationship between Royce Canyon and Sennett Creek is not fully articulated, Royce Canyon and Sennett Creek are wildlife sanctuaries and corridors, and the proposed project would significantly and negatively impact wildlife living in or traveling through these areas.

In addition, the DEIR states that Sennett Creek “has no direct ecological connection with the Los Angeles River, as it did once.” This statement ignores the ongoing efforts to revitalize the Los Angeles River. Revitalization of the Los Angeles River may well necessitate restoration, at least to some extent, of the many tributaries to the River, and this may include Sennett Creek.

We believe that Sennett Creek, including the protective canopies on its sides, should remain undisturbed.
As the Draft EIR explains on page IV.C-20, Sennett Creek originally was comprised of oak/sycamore dominated riparian woodland that stretched from the Los Angeles River upward into what is now called Royce’s Canyon in Griffith Park. Prior to 1940, Sennett Creek was one of many ecologically functional tributaries to the Los Angeles River. With the channelization of the Los Angeles River, Sennett Creek has been truncated. Portions of the creek have been affected by historic development of the Project Site as well; however, those previously affected sections have been largely restored and are now comprised of mixed willow riparian scrub intermixed with newly established sycamores, cottonwoods, and coast live oaks. (See Section IV.C, Biological Resources, of the Draft EIR, page IV.C-20.) Currently, Sennett Creek provides habitat and cover for riparian-dwelling and stream-dependent organisms, but it has no direct ecological connection with the Los Angeles River, as it once did. As such, it provides a water source and a movement area for animals like mule deer, long-tailed weasel (Mustela frenata), bobcat (Lynx rufus) and northern raccoon; however, its functions with regard to connectivity into greater Los Angeles River-associated habitats have been largely eliminated due to the current condition of the River and the extensive conversion of habitats throughout the San Fernando Valley. Moreover, regulatory status organisms that once might have used the river to access other tributary stream systems (such as anadromous fish species, California red-legged frog [Rana draytonii], and regulatory status small mammals like Los Angeles pocket mouse [Perognathus longimembris brevinasus] and perhaps kangaroo rats [Dipodomys spp.]) now are in decline or absent. Therefore, while organisms now present in the area most likely do venture into Sennett Creek for water and for cover, they do not do so in a manner consistent with the actual role of wildlife corridors. (See page IV.C-22 of the Draft EIR.)

With respect to hydrological connectivity, as the Draft EIR explains in Section IV.G, Hydrology/Water Quality on page IV.G-3, Sennett Creek enters the Forest Lawn Memorial-Park property in the southern portion of the Project Site where stormwater flows from the north-facing slopes of the Santa Monica Mountains converge into a more distinct channel and flow onto the Project Site. Sennett Creek flows through the Project Site to an adjacent property, owned by Junior Achievement of Southern California, Inc., where waters from Sennett Creek then enter three corrugated metal pipes, each approximately 60 inches in diameter, located underneath Forest Lawn Drive. On the other side of the public right-of-way, the waters pass through a concrete outfall structure located on what appears to be Los Angeles Department of Water and Power property, to an outlet into the concrete channel of the Los Angeles River.

The current condition of the River at its confluence with Sennett Creek is degraded and human-modified. The Los Angeles River is entirely concrete-lined at the confluence, and has been deepened substantially below the grade at which it once naturally joined with Sennett Creek. The Los Angeles River Flood Control Channel has no vegetation or
canopy at its confluence with Sennett Creek. As noted above, Sennett Creek flows are now conveyed under Forest Lawn Drive through three large, circular pipes and into an outfall structure, which appears to be entirely concrete, but the bottom of the structure has sand and cobbles in it. Sediment has accumulated and appears to provide a substrate supporting vegetation. A mix of invasive, non-native trees and native riparian vegetation is now present in the outfall structure, including Peruvian pepper trees (*Schinus molle*), black cottonwood (*Populus trichocarpa*), willow (*Salix* sp.), mulefat (*Baccharis salicifolia*), California grape (*Vitis californica*), and poison oak (*Toxicodendron diversilobum*). Flows drop down into the Los Angeles River Flood Control Channel from the inclined outfall at an approximate height of 25 feet above the floor of the channel. Mammals, most reptiles and amphibians cannot presently move into or out of the outfall structure or out of the channel, although some animals may be washed into the channel from time to time during higher intensity storms. Additionally, when the River is in flood stage its flows are likely high enough to reach to the outfall. Birds can fly freely from the channel bottom, through or over the outfall, across Forest Lawn Drive, and into Sennett Creek, but no habitat is present in the channel at this location to support most native animal species. Wading birds, waterfowl, and birds associated with open areas (red-tailed hawks, turkey vultures, various ducks, etc.) can be found foraging in the channel.

As explained in the Draft EIR, the proposed Project would impact approximately 12 acres of riparian-associated habitats (e.g., western sycamore/coast live oak, western sycamore/willow riparian forest, southern willow scrub, mulefat scrub, southern willow scrub/mulefat scrub, and disturbed mulefat scrub) on the Project Site. Sennett Creek, including the protective canopies referenced in the comment, would be avoided by the proposed Project, with the exception of 0.05 acre of “waters” (or 0.33 acre of CDFG jurisdictional “streambeds”) that would be affected by a proposed culvert crossing similar in design to existing road crossings, though the new crossing would be soft-bottomed to further reduce impacts. Most of the Sennett Creek tributaries which would be affected by Project development do not contain surface water during summer months, although the lower reaches of Sennett Creek appear to support surface water each year. During summer months when water is scarce and found mostly in lower elevation areas, the preservation of Sennett Creek should provide adequate water resources. Though approximately 12 acres of riparian-associated habitat would be removed and animal movement through several drainages on the Project Site would be impeded with implementation of the proposed Project, the proposed Project would not create a substantial barrier to animal movement given the small area of the larger habitat complex that would be affected. Furthermore, the existing impaired connectivity to the Los Angeles River via Sennett Creek and its tributaries, which provide habitat and cover but no longer have direct ecological connection with the Los Angeles River, would remain in place. Implementation of the proposed mitigation measures described in Section IV.C of the Draft EIR, including Mitigation Measures C-1 through C-6, C-10 through C-16, and C-18 through C-19, would be expected to further reduce impacts, resulting in an overall impact with
III. Responses to Comments

respect to animal movement that would not be significant. (See page IV.C-40 of the Draft EIR.)

Although the future restoration of tributaries to the Los Angeles River as suggested by the comment is speculative, Forest Lawn has successfully restored a large portion of Sennett Creek within the Project Site over the past approximately 12 years, and additional restoration is proposed in connection with the Project, including the restoration of an acre of riparian habitat adjacent to Sennett Creek. (See Mitigation Measure C-5 on page IV.C-47 of the Draft EIR.) The only other drainage on the Project Site that is directly tributary to the River is “Drainage L.” Drainage L is ephemeral in nature and only receives flows during storm events. All of “Drainage L” is heavily disturbed, and much of it flows on an old asphalt road. Drainage L conveys flows to the Los Angeles River through an existing 48-inch reinforced concrete pipe under Forest Lawn Drive. Drainage L is jurisdictionally disjunct and not continuous due to historic disturbance. Under the proposed Project, Drainage L would be enhanced, and Project mitigation includes the creation of an acre of riparian habitat along Drainage L. (See Mitigation Measure C-4 on pages IV.C-46 through IV.C-47 of the Draft EIR.)

Comment No. 30-4

Unnecessary Destruction of Trees

The DEIR states that there are 1,425 protected trees in the Project Area. The proposed project would result in the destruction of over 800 of these (mostly) ancient oaks. That means that over one half of the protected trees will be destroyed. The DEIR proposes that this destruction can be mitigated by planting seedlings and acorns elsewhere in Griffith Park or perhaps in other areas.

(It should be noted that ongoing construction activities within the boundaries of Forest Lawn appear to have already resulted in the destruction of over one hundred trees.)

Many of these trees are centuries old. Re-planting does not replace the environment that will have been permanently altered by the destruction. Mature trees form the canopy under which wildlife flourishes. Root structures hold the soil and deter erosion. Ancient, beautiful oaks and other trees also form the tranquil, spiritual, inspirational backdrop that makes the area desirable as a cemetery.

All of the 1,425 trees should continue to be protected.
Response to Comment No. 30-4

As explained on page IV.C-24 in Section IV.C, Biological Resources, of the Draft EIR, all trees within the Project Site that are protected under the Los Angeles Municipal Code have been identified, inventoried, evaluated and mapped. Currently, there are a total of 1,425 protected trees within the Project Site: 1,007 coast live oaks, 220 western sycamores, and 198 Southern California black walnuts. Eight hundred thirty-five (835) protected trees, including 632 coast live oaks, 59 western sycamores, and 144 Southern California black walnuts, would likely be removed with implementation of the proposed Project. Pursuant to Mitigation Measure C-9, set forth on pages IV.C-49 through IV.C-51 of the Draft EIR, the Applicant must replace all coast live oak, western sycamore, and Southern California black walnut trees greater than or equal to four inches in diameter-at-breast height removed in connection with the Project. Replacement trees would be planted on the Project Site or at approved off-site locations at a 2:1, 3:1, 5:1, 10:1, or 15:1 ratio, depending on the size of the removed tree (diameter-at-breast height) and whether it is in a CDFG jurisdictional area. Replacement trees may be planted in connection with the creation, restoration, and enhancement of habitat required pursuant to Mitigation Measures C-2 through C-5 and C-8, which would further reduce impacts. Implementation of the proposed tree mitigation program would reduce the impacts to protected trees to a less-than-significant level. In addition, the number of replacement trees set forth in the proposed tree mitigation program would exceed the number of replacement trees required by the LAMC. (See pages IV.C-56 through IV.C-57 of the Draft EIR.) As noted above, the Project’s mitigation program includes measures to plant graded slopes on-site with native plant communities, including coast live oak and Southern California black walnut trees. (See page IV.C-44 of the Draft EIR.) For example, Mitigation Measure C-3 requires the creation of 8 acres of graded slopes on-site to be planted with coast live oak and/or Southern California black walnut trees. (See page IV.C-46 of the Draft EIR.) Mitigation Measures C-4 and C-5, which require the on-site creation/restoration of riparian habitat, requires western sycamore to be used as a dominant element for planting within the mitigation areas. (See pages IV.C-46 through IV.C-47 of the Draft EIR.)

With respect to the use of acorns and seedlings, in a habitat creation or restoration environment, acorns and seedlings are consistently much more successful than larger box trees. Restoration biologists and ecologists widely recognize that smaller material does much better over time than larger material planted for aesthetic purposes. Smaller material is easily derived from local genetic sources rather than imported as a larger tree from distant nurseries. Locally derived material often is especially adapted for micro-climatic conditions which increases survivability of saplings. Smaller material has the opportunity to root effectively after planting, which provides the new sapling with the following advantages: (i) higher root versus crown biomass (i.e. the roots are more fully developed to support the portion of the tree aboveground), which allows greater water and nutrient uptake for aboveground foliage; (ii) better anchoring for trees during wind events with less
III. Responses to Comments

wind resistance aboveground to prevent toppling; and (iii) greater adaptability to soil conditions.

With respect to prior tree removals, as explained on pages II-1 and II-3, in the Project Description of the Draft EIR, the majority of the Project Site, approximately 410 acres, is permitted as a cemetery pursuant to a Conditional Use Permit issued by the City of Los Angeles in 1948, and approximately 30 acres are permitted for cemetery use pursuant to subsequent Conditional Use Permits. As such, Forest Lawn has operated a cemetery use at the Project Site for approximately 60 years. As explained on pages H-10 to H-11 of Section IV.H, Land Use Planning, of the Draft EIR, in 1980, the City adopted the Oak Tree ordinance, which included certain exemptions from the new oak tree removal and relocation permit requirements for certain previously approved projects. Forest Lawn applied for verification from the City that the this exemption applied to the Forest Lawn Memorial-Park–Hollywood Hills property. As a result of this request, the City and Forest Lawn entered into a Stipulated Judgment (filed with the Superior Court) in 1998 to govern the removal or relocation of oak trees from the Forest Lawn Memorial-Park–Hollywood Hills property. Pursuant to the 1998 Stipulated Judgment, Forest Lawn is permitted to remove or relocate oak trees from the Forest Lawn Memorial-Park–Hollywood Hills property. Forest Lawn is required to replace any oak tree removed from the Forest Lawn Memorial-Park–Hollywood Hills property with an oak tree sapling (propagated, to the extent possible, from acorns collected from coast live oak specimens located on the Hollywood Hills property). The oak tree saplings may be planted within Forest Lawn’s property or installed on City property around and including Griffith Park.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 30-5

Disturbance of Rare Plants

The DEIR states that the vast majority of Humboldt Lillies, Mariposa Lillies, Southern California Black Walnuts, and Matilija Poppies, rare plants all, will be disturbed within the Project Area. Mitigation measures are said to include seed collection and salvaging of bulbs and replanting in unspecified locations. Where are these locations? Are they within Griffith Park? If so, is the terrain conducive to growth for these particular plants?

These mitigation measures are too vague to permit reasonable evaluation.

Response to Comment No. 30-5

As explained on page IV.C-37 in Section IV.C, Biological Resources, of the Draft EIR, three regulatory status plant species or subspecies (Catalina mariposa lily, ocellated...
Humboldt lily, and Southern California black walnut) are confirmed present on the Project Site. Implementation of the proposed Project would result in the removal of approximately 65 individual Catalina mariposa lilies, 12 individual ocellated Humboldt lilies, and 144 Southern California black walnut trees. Under the City of Los Angeles CEQA Thresholds Guide significance threshold, the potential impacts to these three plant species would be considered significant prior to mitigation. However, implementation of the mitigation measures provided in the Draft EIR, including Mitigation Measures C-1, C-2, and C-4 through C-7 would reduce all impacts to regulatory status plant species to a less-than-significant level. Pursuant to Mitigation Measure C-6, set forth on page IV.C-47 of the Draft EIR, a habitat improvement and monitoring program will be implemented for the conserved and restored areas on the Project Site described in Mitigation Measures C-1 through C-5 on pages IV.C-44 through IV.C-47 and will include the selective revegetation of areas with the appropriate native plant species selected by a qualified biologist/restoration ecologist and based on analysis of existing high quality native habitat of the type to be restored. Pursuant to Mitigation Measure C-7, set forth on page IV.C-48 of the Draft EIR, Forest Lawn shall use reasonable efforts to salvage seeds and bulbs from Catalina mariposa lily, Southern California black walnut, and ocellated Humboldt lily to be utilized in a propagation program and utilized in the selective revegetation program as provided for in the plan described in Mitigation Measure C-6 prepared by a qualified biologist/restoration ecologist. Collected plant material which cannot be utilized on-site shall be dedicated to a native plant nursery or conservation entity skilled and actively engaged in the propagation of plant material to be utilized as deemed appropriate by that entity.

Coulter’s matilija poppy, which was detected on the Project Site, is considered to be the result of its use as a cultivar. Coulter’s matilija poppy does not occur in the Santa Monica Mountains naturally. Although the entire stand of approximately 15 to 30 shoots would be impacted by Project implementation, this impact would not be significant, given that it is a cultivar. Accordingly, no mitigation is required.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 30-6**

**Impacts on Native Bird and Bat Species**

The DEIR proposes that surveys of native birds be taken, but only during one selected time of the year. Is this specific time the nesting time for all native birds to be impacted?

**Response to Comment No. 30-6**

Pursuant to Mitigation Measure C-11, set forth on page IV.C-51 of Section IV.C, Biological Resources, of the Draft EIR, if Project grading and construction activities
requiring the removal of vegetation occur during the breeding season for birds, nesting bird surveys shall be conducted within the disturbance footprint plus a 100-foot buffer in accordance with the following:

a. A minimum of 2 pre-construction surveys for nesting birds shall be conducted 5 days apart prior to construction. The last survey shall be conducted no more than 3 days prior to the initiation of clearance/construction work;

b. If pre-construction surveys indicate that bird nests are not present or are inactive, or if potential habitat is unoccupied, no further mitigation is required;

c. If active nests of birds are found during the surveys, a species-specific no-disturbance buffer zone shall be established by a qualified biologist around active nests until a qualified biologist determines that all young have fledged (no longer reliant upon the nest).

Implementation of Mitigation Measure C-11 would reduce the Project’s potential impacts to up to three regulatory status bird species (Cooper’s hawk, yellow, warbler, and Southern California rufous-crowned sparrow as stated on page IV.C-36 of the Draft EIR) to a less-than-significant level. (See page IV.C-54 of the Draft EIR).

Comment No. 30-7

The DEIR makes no reference to any bat surveys in the Project Area. The Sierra Club is aware that there have been bat surveys within Griffith Park, but these are not referenced in the DEIR. Native Bat populations have been observed. An environmental assessment should be conducted, and appropriate mitigation measures proposed.

Response to Comment No. 30-7

The General Biological Assessment (attached as Appendix C-1 to the Draft EIR) and Section IV.C, Biological Resources, of the Draft EIR, address the regulatory status bat species with potential to occur on the Project Site. Bat species that were considered are the pallid bat, Mexican long-tongued bat, Townsend’s big-eared bat, spotted bat, western mastiff bat, western red bat, western yellow bat, California leaf-nosed bat, cave myotis, pocket free-tailed bat, and big free-tailed bat. (See pages 62–65 of the General Biological Assessment.) As explained on page IV.C-23 of the Draft EIR, the evaluation for presence of regulatory status organisms included such variables as availability of support resources (such as rock outcrops, surface water, specific host plants, and nesting sites), the location and size of the Project Site, and the history of disturbance. The likelihood of potential occurrences is further predicated on the known distribution of species and their overall habitat requirements and preferences. The habitat needs and known occurrences, including those on Griffith Park, were taken into consideration in the analysis. In addition, the February 2008 Draft Griffith Park Wildlife Management Plan, which was an attachment
III. Responses to Comments

to the Greater Griffith Park Neighborhood Council comment on the Draft EIR Notice of Preparation, and included in Appendix A to the Draft EIR, was taken into account during the preparation of the biological resources section of the Draft EIR, as well as the a February 2009 Draft Report regarding the results of bat surveys conducted on the adjacent Griffith Park property in 2008.

As explained on page 20 of the General Biological Assessment, a species was determined to have a low probability of occurrence on the Project Site if the Project Site is within the historic range or distribution of the species, and habitat on the Project Site is marginal to suitable, but other conditions may exist (adjacent urbanization, isolation, etc.) to suggest a low probability of occurrence. Transitory presence is not necessarily precluded, but site conditions are such that sustained or seasonal presence is unlikely. A species was determined to have a moderate potential of occurrence on the Project Site if the Project Site is within the historic range or distribution of the species, the species has a reasonable possibility of occurrence within the Forest Lawn Property, habitats are suitable, and the species is known to occur in the area. Some areas of habitat may be slightly altered or degraded from original condition but overall conditions are such that sustained or seasonal presence is possible. As explained on page 21 of the General Biological Assessment, a species was determined to have a high potential of occurrence on the Project Site if the Project Site contains suitable to very favorable habitat for the species, and the organism has recently been recorded in the vicinity, or ecological conditions are such that qualified personnel can reasonably anticipate presence.

The Mexican long-tongued bat, Townsend’s big-eared bat, and western yellow bat were determined to have a low probability to occur on-site. The cave myotis was determined not to occur on the Project Site. As noted on page IV.C-37 of the Draft EIR, one regulatory status bat species, western red bat, was determined to have a high likelihood of occurrence on the Project Site. The western red bat is considered a species of special concern, second priority by the CDFG. Three regulatory status bat species, pallid bat, spotted bat, and western mastiff bat, were determined to have a moderate likelihood of occurrence on the Project Site. For purposes of the analysis, the Draft EIR conservatively assumed that these four regulatory status bat species (those with a moderate to high likelihood of occurrence on the Project Site) would be potentially impacted by the proposed Project. As noted on page IV.C-37 and on Table IV.C-2 on pages IV.C-31 through IV.C-33 of the Draft EIR, the proposed Project could remove up to 17.6 acres of habitat that is potentially occupied by western red bat, pallid bat, and western mastiff bat, and up to 17 acres that is potentially occupied by spotted bat. This potential impact to up to four regulatory status bat species could be considered potentially significant prior to mitigation. However, implementation of the mitigation measures provided in the Draft EIR, including Mitigation Measures C-1 through C-6, C-12, C-13, C-15, C-16, C-18, and C-19, would reduce the potential impacts to these four regulatory status bat species to a less-than-significant level. In particular, Mitigation Measures C-12 and C-13 would...
require pre-construction surveys for regulatory status bat roosts and for maternity roosts during the maternity roosting season prior to Project-related clearing, grubbing, demolition, and/or tree removal. As the mitigation measures will be implemented based on the moderate to high likelihood of these four regulatory status bat species occurring within the Project Site, no surveys were conducted or determined to be necessary to confirm their presence or absence.

In addition, bat species designated as Special Animals by CDFG were evaluated for potential presence on the Project Site and are set forth in Appendix E to the General Biological Assessment. These Special Animal bat species include: silver-haired bat, hoary bat, small-footed myotis, long-eared myotis, fringed myotis, and Yuma myotis. (See pages E-4 and E-5 of Appendix E to the General Biological Assessment.) The hoary bat and Yuma myotis were both determined to have a high likelihood of occurrence on the Project Site; the small-footed myotis was determined to have a moderate likelihood of occurrence on the Project Site; and the others were determined to have a low probability of occurrence on the Project Site. As explained in footnote 19 on page IV.C-35 of the Draft EIR, neither CEQA nor the City of Los Angeles CEQA Thresholds Guide requires an assessment of impacts to Special Animals; accordingly, any potential impacts to these species would be less than significant. Nevertheless, any potential impacts to Special Animals would be reduced with the implementation of the mitigation measures set forth in Section IV.C of the Draft EIR and described above.

**Comment No. 30-8**

The Sierra Club has made only a cursory review of the DEIR’s analysis of the impact on bird populations. We may file additional comments on this and other elements of the DEIR at a later date.

**Response to Comment No. 30-8**

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 30-9**

**Cumulative Impacts of Nearby Projects**

The DEIR lists eight “related” nearby projects which are currently underway or are proposed. But the DEIR doesn’t consider the impacts of these projects on Forest Lawn. Some of these projects will greatly increase traffic, noise, congestion, and air pollution along Forest Lawn Drive. The cumulation [sic] effect of these projects and the destruction of habitat proposed in the Project Area will compound the impact on wildlife.
In addition, the proposed project contradicts the goals of one of the related projects, specifically the Griffith Park Master Plan. The DEIR states that “[b]ased on the primary management principle of preserving and restoring natural resources and ecosystems, and enhancing the Park’s natural qualities, the Plan’s goal is to establish a unique Urban Wilderness identity for Griffith Park which fosters a visitor experience that is apart from urban infringements.” The management of Forest Lawn should adopt this principle.

Response to Comment No. 30-9

Contrary to the comment’s suggestion, the Draft EIR does address the potential cumulative impacts associated with the eight related projects identified in Section III, Environmental Setting, of the Draft EIR. Specifically, each of the impact analysis sections within Chapter IV of the Draft EIR includes an analysis of cumulative impacts associated with development of the Project and related projects. Potential cumulative impacts to traffic, noise, air quality, and biological resources associated with the Proposed Project and related projects are addressed in Sections IV.J, Traffic, Circulation and Parking (on page IV.I-32); IV.I, Noise (on page IV.I-32); IV.B.1, Air Quality (on page IV.B-27); and IV.C, Biological Resources (on page IV.C-43). Pursuant to the CEQA Guidelines, the discussion of cumulative impacts “need not provide as great detail as is provided for the effects attributable to the project alone...[and] should be guided by the standards of practicality and reasonableness.” (CEQA Guidelines, Section 15130.)

With regard to traffic, as discussed in Section IV.J. Traffic, Circulation and Parking, operation of the Project would generate negligible, if any new trips. Since the Project’s incremental contribution to the cumulative impact on traffic would be very minor, if any (specifically, less than half of the 500-daily-trip threshold that triggers an expanded traffic analysis pursuant to the City of Los Angeles CEQA Thresholds Guide), it would not result in a significant cumulative effect. With regard to construction traffic, the Project’s construction-related traffic impacts would be less than significant. In addition, as set forth in Section II, Corrections and Additions to this Final EIR, the Applicant has incorporated a project design feature that would limit off-site hauling of soil during the peak traffic hours and provides for the hauling of excavated soil from the Project site to occur primarily at night.

With regard to noise, as discussed in Section IV.I. Noise of the Draft EIR, operation of the Project would not change the various types of activities that occur within the Project Site. In addition, due to their distance from the Project Site and the types of uses proposed, the related projects are not anticipated to generate a substantial increase in noise levels within the vicinity of the Project Site. Accordingly, long-term operational noise and vibration impacts would not be cumulatively considerable. With regard to construction noise, no Project construction activities would occur in close proximity sensitive receptors. In addition, Mitigation Measure I-1 through Mitigation Measure I-4 have been proposed to reduce Project-related noise impacts from construction activities to less-than-significant
III. Responses to Comments

levels. Furthermore, Project-related haul trucks would not utilize the westernmost entrance to the Project Site. Thus, Project-related haul trucks would not pass by nearby residential areas. Overall, the contribution of the Project to potential cumulative construction impacts would not be cumulatively considerable.

With regard to air quality, the SCAQMD recommends that individual projects that exceed the SCAQMD’s recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. The SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to Federal Clean Air Act mandates. As such, the Project would comply with SCAQMD Rule 403 requirements. In addition, the Project would comply with adopted AQMP emissions control measures. Per SCAQMD rules and mandates as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, these same requirements (i.e., Rule 403 compliance, the implementation of all feasible mitigation measures, and compliance with adopted AQMP emissions control measures) would also be imposed on construction projects Basin-wide, which would include each of the related projects mentioned above. From an operational standpoint, the Project would result in a minimal increase in daily vehicular trips and a small increase in regional emissions associated with electricity and natural gas usage for the increase in building square footage. As shown in Tables IV.B-6 and IV.B-7 of the Draft EIR, peak daily emissions of operation-related pollutants were well below the SCAQMD regional and localized significance thresholds (i.e., approximately 1.9 percent of the VOC threshold, 7.6 percent of the NO\textsubscript{X} threshold, and 0.1 percent of the SO\textsubscript{X}, PM\textsubscript{10}, and PM\textsubscript{2.5} thresholds). Based on the above information, construction and operation-related daily emissions at the Project Site would not exceed any of the SCAQMD’s regional or localized significance thresholds and, therefore, cumulative air quality impacts were concluded to be less than significant in the Draft EIR.

As explained in the cumulative impacts discussion in the Biological Resources Section of the Draft EIR, although Griffith Park and other undeveloped lands are directly south, east and west of the Project Site, the other surrounding areas are highly urbanized and would be rarely utilized by wildlife other than those adapted to urban environments. The functional natural habitat within the Project Site is at the edge of the Hollywood Hills/Griffith Park habitat complex, and the 70.42 acres of natural areas on the Project Site that would be impacted by the proposed Project comprise just 1.9 percent of the approximate 3,700-acre area of remnant natural habitat in the easternmost Santa Monica Mountains. Thus, the Project Site does not function as a “macro-corridor” for biological resources. The Project Alternatives would impact a lesser amount of the natural vegetation communities on-site than the proposed Project, as discussed in Section VI, Alternatives, of the Draft EIR, and thus a lesser percentage of the total natural area. This relatively small area that would be affected by the proposed Project (in comparison to the approximately 3,600-acre habitat block) would support a proportionally small amount of wildlife movement. Thus, barriers or impediments to movement in this small area would not preclude or eliminate...
animal movement on the north slope of the Santa Monica Mountains/Hollywood Hills, and
impacts associated with wildlife movement would be less than significant. (See pages IV.C-39 through IV.C-40 of the Draft EIR.) Further, the 3,600-acre block of relatively
natural habitat is, in itself, largely isolated, lacking any connective habitat to natural areas
west of the Hollywood Freeway. Nor have corridors or critical pathways for terrestrial
wildlife been identified. While birds and highly mobile animals may be able to traverse the
Cahuenga Pass, the Project Site is not considered to be a major wildlife movement
corridor, especially given the highly urbanized condition of its surroundings. (See page IV.C-43 of the Draft EIR.) As discussed in the Draft EIR, the proposed Project would not
have a significant impact on biological resources (including vegetation communities,
regulatory status animal or plant species, protected trees, or jurisdictional features) with
implementation of the proposed mitigation program. Any impacts to biological resources
similar to those impacted by the proposed Project as a result of the related projects would
likely be subject to mitigation, resulting in less-than-significant impacts for those related
projects as well. (See page IV.C-43 of the Draft EIR.) Thus, the Project’s potential
cumulative impacts with respect to biological resources would be less than significant.

The goals of the Griffith Park Master Plan do not apply to the Project Site, which is a
privately-owned property and not part of Griffith Park. As noted on page III-27 of the Draft
EIR, the Griffith Park Master Plan is intended to be a physical plan and management
program for Griffith Park. The comment is noted and has been incorporated into the Final
EIR for review and consideration by the decision makers prior to any action on the Project.

**Comment No. 30-10**

Please send any responses to the Sierra Club - Angeles Chapter, 3435 Wilshire Blvd,
Suite 320, Los Angeles, CA 90010-1904.

**Response to Comment No. 30-10**

The comment is noted and has been incorporated into the Final EIR for review and
consideration by the decision-makers prior to any action on the Project.
Comment Letter No. 31

Caroline Schweich
President
The Oaks Homeowners Association
P.O. Box 29155
Los Angeles, CA  90029-0155

Comment No. 31-1

The Oak Homeowners Association previously submitted comments during the scoping period. Sharing borders with Griffith Park, our concern is for the protection of Griffith Park and for the preservation of open space for the Santa Monica Mountain area, in general. We support adherence to all of the guidelines, recommendations and mandates as set forth by the numerous involved local, state and federal agencies, as well as the legal requirements set forth by CEQA.

Response to Comment No. 31-1

A copy of the Commentor's comments submitted during the scoping period were included within Appendix A to the Draft EIR. The introductory comments are noted and have been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 31-2

Our specific comments are as follows:

1. Our greatest concern is a cumulative loss of open space if the proposed project is undertaken concurrently with other pending and underway projects, including the NBC-Universal Project, the Headworks Project, the Oakwood project, and multiple projects set forth by both City and County LA River Revitalization Master Plans. The eastern edge of the Santa Monica Mountain range is under heavy development if one looks at it from an overall cumulative prospective, which CEQA law requires.

Response to Comment No. 31-2

Section III.B, Environmental Setting—Related Projects, of the Draft EIR lists and describes related projects that were accounted for in the Draft EIR’s analysis of cumulative impacts associated with the proposed Project. (See Draft EIR, pages III-26 through III-30.) This list includes the NBC Universal Evolution Plan, the Silver Lake Reservoir Complex Storage Replacement Project, the Headworks Area Ecosystem Restoration Project, the Autry National Center’s Griffith Park Campus Improvement Project, the Griffith Park Master
III. Responses to Comments

Plan, the River Supply Conduit Project—Upper Reach, the Metro Universal Project, and the Department of Water and Power Reservoir Facility. Potential cumulative impacts associated with development of the proposed Project and the related projects noted above are addressed in the impact analysis within Chapter IV of the Draft EIR.

As explained in the Draft EIR, in Section IV.H, Land Use and Planning, the Project Site is designated as “Privately Owned Lands—Cemetery” in the City of Los Angeles General Plan’s Open Space Element. (See Draft EIR page IV.H-7.) Consistent with this designation, under the proposed Project, the Project Site would continue to function as, and provide for, cemetery uses, including the provision of additional interment spaces (ground spaces and built spaces such as mausoleums, columbaria, niches, and crypts) and related facilities to respond to the demand for interment and funeral resources in the greater Los Angeles area.

The Project Site would also continue to function as a location where open space is used for multiple activities by the community, and the proposed Project would retain the current Open Space land use designation. Furthermore, at buildout, the Project Site would include over 300 acres of green space, landscaped area and open space. As noted in Table IV.H-2, City of Los Angeles General Plan Consistency Analysis, the proposed Project would be consistent with the policies of the City of Los Angeles General Plan’s Open Space Element. Thus, potential impacts associated with land use would be less than significant. Given the proposed Project’s consistency with the policies of the Open Space Element, the retention and expansion of open space acreage, and the continuation of existing uses, as well as those improvements proposed by the related projects in the immediate vicinity of the Project Site, cumulative impacts associated with the open space would be less than significant. (See Draft EIR page IV.H-35.)

With respect to biological resources, as explained in the cumulative impacts discussion in the Biological Resources Section of the Draft EIR, although Griffith Park and other undeveloped lands are directly south, east and west of the Project Site, the other surrounding areas are highly urbanized and would be rarely utilized by wildlife other than those adapted to urban environments. The functional natural habitat within the Project Site is at the edge of the Hollywood Hills/Griffith Park habitat complex, and the 70.42 acres of natural areas on the Project Site that would be impacted by the proposed Project comprise just 1.9 percent of the approximate 3,700-acre area of remnant natural habitat in the easternmost Santa Monica Mountains. This relatively small area that would be affected by the proposed Project (in comparison to the approximately 3,700-acre habitat block) would support a proportionally small amount of wildlife movement. Thus, barriers or impediments to movement in this small area would not preclude or eliminate animal movement on the north slope of the Santa Monica Mountains/Hollywood Hills, and impacts would be less than significant. (See pages IV.C-39-40 of the Draft EIR.) As discussed in the Draft EIR, the proposed Project would not have a significant impact on biological resources (including
III. Responses to Comments

vegetation communities, regulatory status animal or plant species, protected trees, or jurisdictional features) with implementation of the proposed mitigation program. Any impacts to biological resources similar to those impacted by the proposed Project as a result of the related projects would likely be subject to mitigation, resulting in less-than-significant impacts for those related projects as well. (See page IV.C-43 of the Draft EIR.) Thus, as the Draft EIR concludes, the Project’s potential cumulative impacts with respect to biological resources would be less than significant.

Comment No. 31-3

2. Agencies, including California Fish and Wildlife, Army Corps of Engineers, Mountains Recreation and Conservation Authority, and Santa Monica Mountain Conservancy District should be respected by Forest Lawn in making decisions to develop the property further, in conjunction with all the other above identified projects. As The Oaks is within the Santa Monica Mountain Conservancy District, we look to their leadership and support all recommendations made known to Forest Lawn with regard to this development.

Response to Comment No. 31-3

As described in the Draft EIR, the Applicant has consulted with appropriate state, federal, county, and city agencies and interested parties, and will continue to coordinate with the appropriate agencies and interested parties as the Project continues through the CEQA process. As noted in the Project Description in the Draft EIR, in addition to the discretionary actions requested of the City, the proposed Project would require regulatory permits, including an Individual 404(b) Permit from the Army Corps of Engineers, a 401 Water Quality Certification from the Regional Water Quality Control Board, and a Streambed Alteration Agreement from CDFG. (See page II-21 of the Draft EIR.) Those permit applications have been filed and were attached to the Draft EIR as Appendices C-14, C-15, and C-16. In addition, the Applicant has entered into an agreement with the Mountains Recreation and Conservation Authority, a joint powers agency of the Santa Monica Mountains Conservancy, for the provision of off-site mitigation in the Los Angeles River watershed in connection with the Project by the Mountains Recreation and Conservation Authority. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 31-4

3. Loss/degradation of ecosystems and loss of biological resources are of utmost concern. Impacts on sensitive species should be studied and sited further, including flora and fauna in Griffith Park, not just those of Forest Lawn property. Loss/degradation of corridors for movement of wildlife and loss/degradation of natural tributaries to the LA River should be considered, not only with respect to biological resources of Forest Lawn, but also with respect to that of Griffith Park and the surrounding Santa Monica Mountain area. The
Sennett Creek corridor is a special situation and is highly unique within the entire Santa Monica Mountain area.

Response to Comment No. 31-4

Table 3 in the General Biological Assessment (pages 36–65) lists regulatory status species evaluated for presence on the Project Site, and Appendix E to the General Biological Assessment lists State Special Animals evaluated for presence on the Project Site. As explained in the Draft EIR, the evaluation for presence for animal and plant species included such variables as availability of support resources, the location and size of the Project Site, and the history of disturbance. The likelihood of potential occurrences is further based on the known distribution of species, and their overall habitat requirements and preferences, including information from the California Natural Diversity Database (CNDDB) regarding species occurrence, population numbers, occurrence dates, and potential threats to organisms, as well as historical records of faunal species occurrence. (See pages IV.C-2 through IV.C-3 of the Draft EIR.) Animal species identified on, or which are potentially present on the Project Site are presented in Appendices A and B to the General Biological Assessment, attached as Appendix C-1 to the Draft EIR. The evaluation of animal species potentially present on the Project Site included consideration of habitat requirements and preferences, and the known distribution of species, including occurrences within Griffith Park. For example, the coast horned lizard was determined to have a high probability of occurrence on the Project Site (and therefore assumed to be potentially impacted by the Project as explained above). As noted in the General Biological Assessment, suitable to favorable habitat for the coast horned lizard is present on the Project Site, and the species was recently detected in Griffith Park. (See page 53 of the General Biological Assessment, attached as Appendix C-1 to the Draft EIR.)

Section IV.C of the Draft EIR as well as its technical appendices thoroughly analyze Project effects on flora, fauna, wildlife movement and natural tributaries to the Los Angeles River. The General Biological Assessment for Forest Lawn Memorial-Park, Hollywood Hills, attached as Appendix C-1 to the Draft EIR, (Section 3.0 Vegetation and Plant Communities, page 25) acknowledges the special conditions present within oak woodlands and associated riparian communities with regard to microclimate, diversity, and overall ecological complexity, as well as the uniqueness that arises from these conditions. As explained in detail in the General Biological Assessment, woodland communities in cismontane Southern California occur where increased soil moisture allows trees and tree canopies to develop. On south-facing exposures, this phenomenon occurs most frequently in close proximity to streams and in canyons shaded from solar penetration. On north-facing slopes and exposures, such as those found on the Project Site, woodlands tend to exhibit their highest diversity in association with streams. Due primarily to aspect (solar angle) and sometimes other various edaphic (soil) conditions, north-slope woodlands are generally dominated by coast live oak trees not dependent directly on stream-associated moisture. When mature, these woodlands establish a sustainable and complex
microclimate. Numerous moisture-dependent shrubs, annual plant species and woodland-dependent wildlife thrive within the relatively moderate temperature regime as compared to adjacent scrub, grassland and chaparral communities. Deep forest soil and forest litter profiles can develop, fostered by microclimatic conditions and enhanced over time by the tree canopy and associated protective elements. The combination of the tree canopy, high amount of overall biomass, deep heterogeneous organic soil layers, prevalence of shade, soil moisture and downed wood, provides a unique and stable habitat for larger mammal, amphibian, avian and invertebrate species. (See page 25 of the General Biological Assessment for Forest Lawn Memorial-Park, Hollywood Hills.)

As explained in the Draft EIR, the proposed Project would impact approximately 12 acres of riparian-associated habitats (e.g., western sycamore/coast live oak, western sycamore/willow riparian forest, southern willow scrub, mulefat scrub, southern willow scrub/mulefat scrub, and disturbed mulefat scrub) on the Project Site. Most of the Sennett Creek tributaries which would be affected by Project development do not contain surface water during summer months, although the lower reaches of Sennett Creek appear to support surface water each year. During summer months, when water is scarce and found mostly in lower elevation areas, the preservation of Sennett Creek should provide adequate water resources. Though approximately 12 acres of riparian-associated habitat would be removed and animal movement through several drainages on the Project Site would be impeded with implementation of the proposed Project, the proposed Project would not create a substantial barrier to animal movement given the small area of the larger habitat complex that would be affected. Furthermore, the existing impaired connectivity to the Los Angeles River via Sennett Creek and its tributaries, which provide habitat and cover but no longer have direct ecological connection with the Los Angeles River, as discussed above, would remain in place. Implementation of the proposed mitigation measures described in Section IV.C of the Draft EIR, including Mitigation Measures C-1 through C-6, C-10 through C-16, and C-18 through C-19, would be expected to further reduce impacts, resulting in an overall impact with respect to animal movement that would not be significant. (See page IV.C-40 of the Draft EIR.) Sennett Creek would be largely left intact. Approximately 0.33 acre of CDFG jurisdictional “streambeds” would be impacted by the proposed culvert crossing in Sennett Creek. (See page IV.C-38 of the Draft EIR.) The proposed culvert crossing would be similar in design to existing crossings and is necessary for proper traffic movement and circulation within the Project Site. Potential impacts of the proposed crossing would be reduced to a less-than-significant level with implementation of the proposed mitigation measures, in particular the acre of restoration in a degraded area adjacent to Sennett Creek pursuant to Mitigation Measure C-5, which is set forth on page IV.C-47 of the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment No. 31-5

4. As Griffith Park is adjacent to Forest Lawn, viewsheds should be scrutinized. “Quality of experience” is an attribute that a park user expects above and beyond that which one expects in a non-park setting, and view is an essential element of that experience. Alternative plans for obscuring the many above ground structures which are planned for the site should be further studied.

Response to Comment No. 31-5

As discussed in Section IV.A, Aesthetics, of the Draft EIR, areas surrounding the Project Site, including Griffith Park, were visually surveyed to identify locations where prominent public views of the Project Site were available. Several locations within Griffith Park, including Mount Hollywood Drive, the Toyon Trail, Mount Lee, and Mount Chapel, offer public views of the Project Site. (See Draft EIR pages IV.A-21 through IV.A-26.) As explained on page IV.A.42 of the Draft EIR, Project improvements would be visible from public vantage points in Griffith Park south and southeast of the Project Site due to the elevated position of such vantage points above the Project Site.

However, as noted in the Draft EIR, Project grading would take place in three general phases and would include areas that are already partially graded. All grading that occurs at the southern end of the Project Site would blend in visually with existing topographical features. As a result, the Project’s final grading and development of these areas would result in more visually uniform contouring throughout the Project Site and would also improve the consistency of the visual character of the Project Site by introducing a final grading design that visually transitions the Project Site with the natural topography of the Project area.

With respect to views of the Project’s proposed structures from analyzed viewpoints within Griffith Park, as explained on page IV.A-43 of the Draft EIR, new construction would incorporate the use of design standards consistent with the existing form, color and materials which typify existing site improvements within the Forest Lawn Memorial-Park–Hollywood Hills property and the architectural scale and massing of the proposed structures would be compatible with the existing structures and development on the Project Site. One of the project’s structures, the proposed tower feature, would rise to a height of up to 90 feet, which is taller than existing and proposed on-site structures. However, from the higher elevation at which the Griffith Park vantage points are located, the difference in height would not be prominent from these vantage points. The Project also proposes mausoleums in the Central and West Areas. Each level of the proposed mausoleums would be approximately 20 feet, and they may be built incrementally as additional interment space is needed. The mausoleums may include a central feature to provide access to all five levels that may reach up to 100 feet in height. Given the historical context of the Forest Lawn Memorial-Park–Hollywood Hills property, as well as the topography and the
employment of the above mentioned design standards, the proposed structures would remain visually compatible with those uses. The Project would provide lawn and garden area landscaping consistent with the existing site development within the developable areas of the Project Site, and groundcover within the undevelopable slope and drainage areas.

As such, the Draft EIR concludes that impacts to visual character and viewsheds from vantage points south of the Project Site would be less than significant.

The Draft EIR notes that the purpose of an alternatives analysis is to review alternatives that have the potential to reduce or avoid the significant impacts of a project. As discussed above and in Section IV.A, Aesthetics of the Draft EIR, implementation of the Project would not result in significant impacts associated with aesthetics or views. Thus, alternatives that focus on reducing the aesthetic and views impacts of the Project are not required. Nonetheless, all of the alternatives evaluated in Section VI, Alternatives, of the Draft EIR, provide a reduction in the construction of non-occupied floor area. However, these alternatives would result in a similar less-than-significant impact on aesthetics as compared to the proposed Project, and would meet several of the Project objectives to a lesser degree than the proposed Project. (See Section VI of the Draft EIR.)

Comment No. 31-6

The Oaks Homeowners Association strongly prefers Alternate Plan 4 or 5. Forest Lawn can successfully fulfill nearly as much interment space with either of these alternatives. In accepting a slightly reduced number of interment sites, Forest Lawn will remain a respected steward for natural habitat. Foregoing development of portions of natural habitat will still yield significant number of interment sites, and achieve them at a lower cost, both environmentally and financially.

Response to Comment No. 31-6

The Commentor’s support for Alternative 4 or 5 is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any a action on the Project. As discussed in Section VI, Alternatives, of the Draft EIR, in accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative, the comparative evaluation of the alternatives indicates that Alternative 4: Reduced Project with Preservation of Drainages D, D1, F, F1, and H would reduce more of the Project impacts than any of the other remaining alternatives and would be the Environmentally Superior Alternative. However, as the Draft EIR notes on page VI-62, Alternative 4 would meet several of the Project objectives to a lesser degree than the proposed Project. As described on page VI-51 of the Draft EIR, Alternative 5: No Federal Action, which would provide a reduction in cemetery development and approximately 50,000 fewer interment spaces (an approximately
25 percent reduction in interment spaces) as compared with the proposed Project. As noted on page VI-61 of the Draft EIR, the Project objectives to help meet the demand for interments for the region through 2050 and beyond, to provide various types of interment spaces and mortuary facilities to meet the needs of a broad array of ethnic and socioeconomic groups, to provide space to accommodate multiple funeral services simultaneously, to provide sufficient ground property, and to provide areas for additional historical and inspirational works of art would only be partially met under Alternative 5.

In addition, although the impacts to biological resources under Alternatives 4 and 5 would be reduced when compared to the proposed Project, the proposed Project would not result in significant impacts on the environment. Thus, neither of these Alternatives would reduce or eliminate a significant impact. The commenter is also referred to Section II, Corrections and Additions to the Draft EIR, of this Final EIR, for an updated description of Alternative 4.
Comment Letter No. 32

Gerry Turner
President 2010–11
Rotary Club of Los Angeles
900 Wilshire Blvd., Ste. 418
Los Angeles, CA  90017
www.rotaryLA5.org

Comment No. 32-1

It is our understanding that Forest Lawn Memorial-Parks and Mortuaries is preparing an expansion of their cemetery at Hollywood Hills (off Forest Lawn Drive and the 134 freeway); and, going through the entitlement process and environmental impact review with the City of Los Angeles. The Rotary Club of Los Angeles and it’s over 400 Members would like to offer our support of this expansion.

Forest Lawn has always offered more to our communities than the peace and comfort of resting places for loved ones who have passed on. For example, with its proximity to Griffith Park, Forest Lawn–Hollywood Hills offers an idyllic landscape that proudly showcases a unique collection of American architecture and artworks that honors our country. Visitors can feel the excitement of the American Revolution as they stand before the world’s largest historical mosaic, The Birth of Liberty... or visit a faithful reproduction of Boston’s fabled Old North Church... see larger-than-life-sized bronze statues of Washington, Jefferson and Lincoln... watch a free 26-minute movie about the American Revolution... and tour the Plaza of Mesoamerican Heritage, a tribute to the early civilizations of North America who thrived in the land that is now Mexico.

The Rotary Club of Los Angeles has had a long relationship with the senior management and directors of Forest Lawn. They are not only outstanding members of our Club, but influential citizens who have made significant contributions through Rotary International. They have participated in the improvement of peoples’ lives in our Communities from caring for the homeless to eradicating the polio virus world-wide through International service.

Thank you for your kind consideration. We look forward to your favorable decision to allow this important expansion to serve our community.

Response to Comment No. 32-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 33

Sue Abrahamian
9653 McLennan Ave.
Northridge, CA 91343

Comment No. 33-1
Forest Lawn’s Hollywood Hill’s expansion plans are faithful to their traditions which have served Los Angeles well.

The plans will preserve the memorial park’s serenity and beauty. As detailed in the Aesthetics Section of the Draft EIR, the project will be compatible with the existing park and the new facilities will be integrated seamlessly into the settings, maintaining Forest Lawn’s standards.

The newly developed areas will be landscaped, expanding the lawns, groundcover, and garden areas and enhancing views. These improvements will make a very positive addition to the memorial-park.

Response to Comment No. 33-1
The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 34

Edward R. Amey, MS
Executive Director
L.A. Lutheran High School
13570 Eldridge Ave.
Sylmar, CA 91342

Comment No. 34-1

It’s my understanding that the Draft Environmental Impact Report for the Forest Lawn–Hollywood Hills memorial-park expansion is very comprehensive, and it makes a very good case for approving the project. Clearly, there’s a lot of need for the services Forest Lawn provides.

One of the things often overlooked where Forest Lawn is concerned is that the memorial-park and many of its facilities are often provided for public cultural, educational, and civic activities. These are important contributions to our community life and I hope they will be maintained. I have been informed that the DEIR briefly addresses these events as part of the project’s objectives, but it would be reassuring to know that the commitment is real, and that the tradition will continue. L.A. Lutheran High School has used Forest Lawn–Hollywood Hills for our Commencement Exercises for many years, and we are grateful for that opportunity.

I hope that the expanded facilities will be seamlessly integrated into the existing memorial-park, and that Forest Lawn will continue to be a valued resource and active participant in our community’s life.

Response to Comment No. 34-1

The comment expresses support for the Project and notes that the Applicant provides access to organizations and the public at large for cultural, education, and civic purposes at the Project Site. As explained in the Draft EIR, Forest Lawn plans to continue to provide such opportunities for the community. As noted in the Project Description of the Draft EIR, in addition to providing for interment spaces to address the dwindling supply of interment sites in the Los Angeles area, the Project objectives include, among others, to “continue to provide facilities and programs for schools, religious institutions and other organizations and the public at large at the Memorial-Park, consistent with the overall use of the Memorial-Park,” and, to “provide areas for additional historical and inspirational works of art for the benefit of the community within the Memorial Park.” (See pages II-3 through II-5 of the Draft EIR.)
Comment Letter No. 35

Kamran Amirhooshmand
1530 S. Saltair Ave., Apt. 1
Los Angeles, CA  90025

Comment No. 35-1

I am writing in response to the publication of the Draft Environmental Impact Report for the Forest Lawn–Hollywood Hills project. As a frequent visitor to the memorial-park, I want to be sure that construction activities on the new interment areas do not interfere with funerals or visitors to existing gravesites.

Forest Lawn–Hollywood Hills is an oasis of respectful serenity in the midst of our city, and its integrity should be maintained once the project is approved. The additional sites and facilities are clearly needed by the community so that the memorial-park can continue to accommodate the needs of local families. Forest Lawn is one of the few cemeteries in the region that serve all members of the community without regard to religion or belief, which makes extending its life very important.

If the city and the community can be assured that Forest Lawn will manage the construction process with sensitivity toward those who will be most affected, then the project should move forward without delay.

Thank you for your consideration.

Response to Comment No. 35-1

As explained on page II-5 of the Draft EIR, one of the objectives of the proposed Project is to: “Implement construction in a manner that minimizes impacts to the continuing operations of the Memorial-Park and the continuing delivery of interments and funeral services within the Memorial-Park.” Thus, as part of the Project, the construction process will be managed such that impacts on interments and funeral services, as well as on visitors to existing gravesites, are minimized. Funeral services and visitation of existing gravesites will continue to occur as the proposed Project is implemented, and construction and grading activities will be coordinated so as not to interfere with the operations of the existing cemetery. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment Letter No. 36

Susanna Asatrian
4040 Braeburn Way
Los Angeles, CA  90027

Comment No. 36-1

The Forest Lawn–Hollywood Hills Draft Environmental Impact Report seems to be a very straightforward document. It says to me that the memorial-park expansion is necessary to serve the needs of the local community, that it will be accommodated on Forest Lawn’s property, and that there will be no long-term significant impacts from the project.

Forest Lawn has been providing cemetery services and interment sites for area residents for decades, and the memorial-park is always beautifully maintained. I learned from the DEIR that recycled water is used for landscape irrigation, and will also be used in the areas proposed for expansion. This is a smart and responsible approach to managing the property, and our scarce resources, and it ought to be mandated by the city as part of the approval process – not only for this project, but for others with large landscaped areas as well.

Cemeteries are an integral part of our culture and heritage, and Forest Lawn exemplifies the environment which we choose for ourselves and our loved ones. It seems to me that this project should be welcomed, and speedily approved.

Response to Comment No. 36-1

The comments in support of the Project and use of recycled water on-site are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 37

Rev. Vazken Atmajian
Pastor
St. Mary’s Armenian Apostolic Church
500 S. Central Ave.
Glendale, CA 91204

Comment No. 37-1
On behalf of St. Mary’s Armenian Apostolic Church Perish, I write to express our support for Forest Lawn’s proposed expansion. It would be most unfortunate if Forest Lawn had to close its doors to the community because they ran out of interment sites.

Forest Lawn is one of the few area cemeteries that serve the needs of everyone in our community in the most dignified and honorable way possible.

Because of Forest Lawn’s professionalism and courtesy, so many of our community members choose the Hollywood Hills Memorial-Park as their final resting place. Moreover, it is one of the most beautiful cemeteries in the area.

Therefore, we at St. Mary’s Armenian Apostolic Church are in favor of the approval of the proposal plan, so that Forest Lawn may continue their good work in our community.

Response to Comment No. 37-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 38

Glen Baker
Principal
Glendale Adventist Academy
A K–12 Christian Preparatory School
700 Kimlin Dr.
Glendale, CA  91206
www.glendaleacademy.org

Comment No. 38-1

Forest Lawn Hollywood Hills currently uses recycled water to irrigate the landscaping throughout the cemetery. According to the Draft Environmental Impact Report on the project, that practice will continue as Forest Lawn develops more of their property for use as interment sites and other important facilities.

Response to Comment No. 38-1

As the comment notes, and as discussed in Section IV.K.1, Wastewater of the Draft EIR, the Applicant currently uses and will continue to use recycled water for landscape irrigation.

Comment No. 38-2

Forest Lawn also proposes to implement other environmentally sound practices such as conserving habitat on the property, and planting live oak and black walnut trees. These are important initiatives that point to Forest Lawn’s commitment to environmental stewardship.

Response to Comment No. 38-2

The comment expresses support for Project actions and mitigation measures that would conserve and enhance biological habitat on the Project Site. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 38-3

Just as important is Forest Lawn’s commitment to the community. For decades, the Hollywood Hills cemetery has provided their facilities and hosted programs for schools, religious institutions and community organizations. Continuing that tradition for years to come is one of the key objectives of Forest Lawn’s Master Plan and one of the reasons I support Forest Lawn’s proposed project.
Response to Comment No. 38-3

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 39

Angelina Balian
19133 Hartland St.
Reseda, CA 91335

Comment No. 39-1
I am writing in support of Forest Lawn’s proposed project.

The Draft EIR shows that there are no significant impacts associated with the plan – providing additional burial sites, creches and other funeral facilities will not harm the neighborhood or negatively affect the area.

Instead, as detailed in the environmental report, Forest Lawn will enhance the local ecology by conserving natural habitat on the property and planting live oak and black walnut trees. These actions will create natural transitions to adjacent undeveloped land and will help to preserve natural habitats.

We need to accommodate death and this plan will provide funeral and cemetery resources that will be needed in the not very distant future.

Response to Comment No. 39-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 40

Adolph Eric Becker  
4296 Don Luis Dr.  
Los Angeles, CA  90008

**Comment No. 40-1**

I am writing to express my support for the Forest Lawn–Hollywood Hills expansion project that is the subject of the above-cited environmental impact report.

As described in the Draft EIR, the areas proposed for the new development will be extensively landscaped to maintain the memorial park’s tasteful ambience and visual aesthetics. It will be compatible with the existing park while enhancing access to burial sites and related facilities for visitation and funeral services.

Forest Lawn has been a resource for generations of Angelenos. Years of experience and a tradition of service to the bereaved has clearly provided Forest Lawn with an understanding of what families need and the right way to serve them. The proposed project is a good example of that understanding and respect and will provide needed burial plots for the future.

**Response to Comment No. 40-1**

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 41

Rachel Belotserkovsky
12410 Chandler Blvd., #2
Valley Village, CA  91607

Comment No. 41-1

The Draft Environmental Impact Report for the Forest Lawn–Hollywood Hills project seems to cover the potential consequences of creating new burial sites for residents of our community. It’s a relief to see that there are really no long-term significant impacts associated with the project, and, for a change, no new traffic issues.

Response to Comment No. 41-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.

Comment No. 41-2

Since the areas designated for new facilities are adjacent to open space in Griffith Park, it doesn’t look like construction noise will be much of a problem either. I think the proposal to conserve some of the property as a natural habitat is very important, so that a transition area is created between Griffith Park and the memorial-park. These areas will help protect wildlife and help to ensure that the adjacent natural habitats are maintained. Will the City monitor the creation and maintenance of the conservation habitats to make sure that they achieve these goals?

Response to Comment No. 41-2

Pursuant to Mitigation Measure C-6, set forth on pages IVC-47 and IV.C-48 of Section IV.C, Biological Resources, of the Draft EIR, Forest Lawn shall implement a five-year habitat improvement and monitoring program for the conserved areas on-site, in accordance with a plan prepared by a qualified biologist/restoration ecologist. Pursuant to Mitigation Measures C-1 through C-5, Forest Lawn shall also record a covenant and agreement not to develop or bury within the conserved areas. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 41-3

It looks like the proposed Forest Lawn project achieves the right balance between the need for expanded cemetery facilities and a concern for the adjacent environment, so I believe it ought to be approved.
Response to Comment No. 41-3

The comment acknowledges the Draft EIR’s comprehensive analysis of the Project’s potential impact on surrounding areas, as well as the Draft EIR’s conclusion that the Project will have a less-than-significant impact on the environment. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment Letter No. 42

Robert M. Bock  
Senior Pastor  
First Christian Church of North Hollywood  
4390 Colfax Ave.  
North Hollywood, CA 91604-2898

Comment No. 42-1

It has come to our attention that there has been some objection to the proposed expansion of Forest Lawn Hollywood Hills cemetery. I would like you to know there is also wide spread support of their proposed expansion, especially from the members of this church family as well as from the faith communities of this area.

First Christian Church is located only ten minutes from Forest Lawn Hollywood Hills. There are over 1,000 members in the church and I have served as their Sr. Pastor for 42 years. Over those years I have obviously officiated at the funeral and burial services for hundreds of parishioners. The vast majority chose Forest Lawn because of their professionalism, their beautiful facilities and the inspiring appearance of the cemetery grounds.

Forest Lawn has owned the property in question for decades. From our perspective the only change that will be seen from the freeway as well as the neighboring areas is from dull brown under bush to beautiful manicured green lawns. There are hundreds of acres of wilderness area adjoining Forest Lawn for the nature lovers of our community including several hundred miles of bridal trails. However, for those facing the major decision regarding the final resting place for their loved ones, the beauty of Forest Lawn is one of the very few available in Southern California.

Therefore the members and staff of First Christian Church North Hollywood are completely in favor of the approval of the proposed plan that would allow Forest Lawn to continue their outstanding service to their community.

Response to Comment No. 42-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 43

Edward Bockser
4741 Clybourn Ave.
Toluca Lake, CA  91602

Comment No. 43-1

We know that death is inevitable; we must provide for it in the future as we have in the past.

This project will allow Forest Lawn to add to its supply of interment sites at its Hollywood Hills Memorial Park and thus be able to continue to offer funeral resources within their existing property. Otherwise, as indicated in the Draft EIR, the Forest Lawn–Hollywood Hills site will likely exhaust its supply of burial sites in a half dozen years or less.

This master plan will allow Forest Lawn to continue its tradition of providing exceptional services to the community. The need for additional interment sites is important to the community, and to the many thousands of families in the area who depend on Forest Lawn.

Forest Lawn is known for serving the needs of all people, regardless of belief, and providing the resources which suit each individual family. As detailed in the Draft EIR, the proposed project will continue that tradition by enabling them to continue to offer ground burial sites which are preferred by many.

Response to Comment No. 43-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 44

William J. Bowers
4740 Placidia Ave.
Toluca Lake, CA 91602

Comment No. 44-1

The draft environmental report for this Hollywood Hills Forest Lawn expansion acknowledges that the Los Angeles area is running out of cemetery plots. That being the case, I see no reason not to approve this plan which will help to meet these needs for the future.

The Forest Lawn Memorial Parks have been a respected tradition in southern California for a century or more. We live in a region with a variety of religious beliefs and cultural practices, many of which favor traditional burial. This plan shows the same level of concern in providing a dignified final resting place that Forest Lawn has long demonstrated.

The project will enable Forest Lawn to continue to meet the needs of different religious and ethnic groups on into the future as it has in the past.

Response to Comment No. 44-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 45

David Briggs
2522 S. Bentley Ave.
Los Angeles, CA 90064

Comment No. 45-1

Forest Lawn–Hollywood Hills is fast running out of its ability to serve the community. This memorial park and cemetery has been a fixture and a resource for over 100 years, offering its services to all, no matter their faith nor ethnicity.

The draft EIR shows Forest lawn’s thoughtful plans for continuing to serve as this same kind of resource well into the future. As the environmental document indicates, without the new facilities, the Hollywood Hills memorial park will run out of interment sites in only a few years. This plan provides the way to prepare for future decades by utilizing undeveloped portions of their property to extend and expand the park.

Our community embraces a variety of cultures and belief systems, all with different approaches to interment. According to the Draft EIR, the project proposed by Forest Lawn–Hollywood Hills respects these beliefs and provides new burial sites, as well as other alternatives, to make certain that all of our families have the resources they want and need.

Response to Comment No. 45-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 46

Cleo Cameron
4961 Linscott Pl., Apt. 1
Los Angeles, CA 90016

Comment No. 46-1

I understand from the draft Environmental Impact Report that Forest Lawn–Hollywood Hills will soon run out of burial property if its Master Plan is not approved. The memorial park has space on its existing property to add interment sites as well as build mausoleums and wall crypts, so my question is, why wouldn't this project be approved?

The Draft EIR stated there are no significant impacts associated with the project. I was also pleased to learn that construction traffic would be limited to non-residential areas. Furthermore, I understand that even though the project would add more interment sites, it would have virtually no impact on traffic in the area.

We need to extend the life of Forest Lawn to meet the growing demands for cemetery space in the area. As far as I can tell, there are numerous benefits in doing this and I can see no reason why their plan should not move forward.

Response to Comment No. 46-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 47

Ruthann Carlson
15916 Gledhill St.
North Hills, CA 91343

Comment No. 47-1

The draft environmental impact report concerning Forest Lawn–Hollywood Hills’ Master Plan contained a lot of detailed information about the need for more interment sites in the area.

I was surprised to learn that the memorial park is in danger of running out of burial property in the next few years and that the situation is just as dire for other nearby cemeteries.

We often hear of population growth and its impact on community, city and state services, but this is the first time I’ve thought about the increased demand on burial and funeral services. Forest Lawn’s plan ensures that the community’s burial needs are taken care of well into the future.

Please approve the memorial park’s important plan. Thank you.

Response to Comment No. 47-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 48

William S. Coburn, Architect  
12802 Landale St.  
North Hollywood, CA 91604

Comment No. 48-1

Over nearly sixty years, I have been impressed by Forest Lawn–Hollywood Hill’s serenity and beauty along with its commitment to inclusion. The memorial park is one of the few in the area that has a long and proud tradition of serving the needs of everyone in our community – regardless of beliefs. My family and I purchased property there when it first opened. We visit the park often as six of our immediate family rest there.

As an Architect, I believe Forest Lawn needs the community’s support and that’s the purpose of this letter. I’m writing to express my support for Forest Lawn’s expansion plans and ask you to allow the project to move forward.

I am told that the project will enable Forest Lawn to build new facilities and develop much needed burial property within its existing property. It will also allow more families, much like my own, the opportunity to bury their loved ones close to where they live.

I understand these enhancements will be completely compatible with the rest of the park’s design and aesthetics.

Please endorse this important project.

Response to Comment No. 48-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 49

Naomi Collins
1083 S. Genesee Ave.
Los Angeles, CA 90019

Comment No. 49-1

As Forest Lawn–Hollywood Hills’ Master Plan continues to make its way through the review process by the City of Los Angeles and other government agencies, I hope you will keep the following in mind:

1. Without this project, Forest Lawn will potentially run out of interment sites in five to six years.

2. The supply of interment sites in the nearby area is expected to be depleted within seven years.

3. There are no significant consequences as a result of the plan, according to the Draft Environmental Impact Report.

4. There will be minimal inconvenience to neighbors during the construction process, with construction vehicles slated to use Forest Lawn Drive directly to the Ventura Freeway, with many of those trips taking place at night.

5. The project will use recycled water for landscape irrigation.

As far as I’m concerned, the community can only benefit from such a project. Please approve it as soon as possible.

Response to Comment No. 49-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 50

John Combes  
Director  
Notre Dame High School  
Irish Knight Band  
13645 Riverside Dr.  
Sherman Oaks, CA 91423-2494  
www.ndhs.org

Comment No. 50-1

Throughout the years Forest Lawn has opened its doors to host graduation ceremonies and cultural programs. We at Notre Dame High School are particularly grateful for the opportunities we’ve had to utilize their facilities. That is why I am writing today to express our support for Forest Lawn and its Master Plan proposal.

According to the Draft EIR, the proposed project has been carefully analyzed and it has been determined that there are no significant or unavoidable environmental impacts resulting from the project. This is great news and should mean that the project can move forward in a timely manner.

Of course the community will benefit from the additional interment sites that will result from the project. But the real benefit comes from the role Forest Lawn plays in the community. Currently, the public has access to numerous works of art and other inspirational elements that are open to anyone. Our particular community benefits from the use of the facilities for concerts and programs, as well as participation in the meaningful patriotic programs presented by Forest Lawn that are open to, and benefit the public and our veterans.

Please make sure that Forest Lawn can continue its important operations so that the generous contributions it makes to the community can continue as well.

Response to Comment No. 50-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 51

James Covey  
CEO  
Inland Hospice Association  
Inland Hospice & Palliative Care  
233 West Harrison Ave.  
Claremont, CA 91711  
www.inlandhospice.org

Comment No. 51-1

I would like to add Inland Hospice Association’s support to Forest Lawn’s plans to expand their Hollywood Hills location.

Today in this world of the high tech and mass marketing, we have always found our friends at Forest Lawn to be caring and compassionate when dealing with families who have experienced a loss of a significant other.

Those families who have been assisted by Forest Lawn staff continually mention how they were handled with both dignity and empathy which greatly facilitated their healing process.

Forest Lawn’s Hollywood Hills location has long been known throughout the surrounding area as having the ability to handle a multitude of ethnic diversities.

So, on behalf of Inland Hospice Association, I encourage you to approve their proposal for future expansion.

Response to Comment No. 51-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 52

Erna Craig
5212 Los Hermosos Way
Los Angeles, CA  90027

Comment No. 52-1

People don’t ordinarily like to talk about the need for cemeteries, so the Forest Lawn–Hollywood Hills Draft Environmental Impact Report is a little unsettling. But the truth is that we need to have these facilities, and we also need to have them in the middle of existing communities so people don’t have to travel long distances for interments and subsequent visits.

The Forest Lawn DEIR makes a good case for extending the life of the memorial-park, and for doing it with virtually no impacts on the surrounding communities. No one will be affected by construction activities, there will be no increase in traffic, and the creation of conservation habitats adjacent to Griffith Park, may actually help to preserve the wildlife and open space in the park. It seems like the only thing area residents may notice about the project is the procession of hauling trucks and construction vehicles vying for a place on the Ventura Freeway access ramps. If construction traffic is managed correctly, with the majority of trips in off-peak hours, even this may not be a problem.

If Forest Lawn manages construction with the same sensitivity they apply to managing the memorial-park, then there seems to be no reason why this project shouldn’t be approved.

Thank you for your consideration.

Response to Comment No. 52-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration. Consistent with the suggestion made in the comment, construction activities, including operation of haul trucks, would occur in accordance with the City of Los Angeles Department of Building and Safety’s “Good Neighbor Construction Practices” to minimize construction related effects on the community. In addition, as set forth in Subsection IV.J, Traffic and Circulation, of Section II, Corrections and Additions, to this Final EIR, a project design feature has been included as part of the Project that will limit hauling during the peak traffic hours and provides for the hauling of excavated soil from the Project Site to occur primarily a night.
Comment Letter No. 53

Joyce Dillard
P.O. Box 31377
Los Angeles, CA  90031
dillardjoyce@yahoo.com

Comment No. 53-1

Due date was Cesar Chavez Legal Holiday on Monday, 3/28/2011.

This is a Master EIR for:

1. Public Benefits Approval
2. Development Agreement
3. Site Plan Review Findings
4. Grading and Stockpiling Permits
5. Haul Route Approval
6. Land Use and Building Permits
7. Protected Trees Removal Permits
8. Department of Fish and Game Permits
9. US Army Corps of Engineers Permits
10. Regional Water Quality Resource Board Permits

Response to Comment No. 53-1

The initial 45-day comment period for the Draft EIR began on February 11, 2011, and was scheduled to end on March 28, 2011. However, in response to requests to extend the review period, on March 25, 2011, the City of Los Angeles extended the comment period by an additional 15 days to April 13, 2011.

To clarify, the Draft EIR is not a Master EIR, but a Project-level EIR, as noted on page I-1 of the Draft EIR. As explained in Section 15161 of the CEQA Guidelines, a Project EIR is the most common type of EIR, and it examines the environmental impacts of a specific development project.

As noted in the Project Description in the Draft EIR, in addition to the discretionary actions requested of the City, the proposed Project would require regulatory permits, including an Individual 404(b) Permit from the Army Corps of Engineers, a 401 Water Quality Certification from the Regional Water Quality Control Board, and a Streambed Alteration Agreement from CDFG. As the Draft EIR further explains, the City serves as the Lead Agency for the EIR pursuant to CEQA. With respect to the permit requested from the
Army Corps of Engineers, a National Environmental Policy Act clearance will be prepared for the portion of the Project within the Army Corps of Engineers’ jurisdiction, with the Army Corps of Engineers serving as the Lead Agency for that clearance. (See pages II-21 and II-22 of the Draft EIR.)

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 53-2**

The CEQA California Endangered Species Act was not addressed in relationship to loss of the ecosystem by this project.

**Response to Comment No. 53-2**

The California Endangered Species Act is addressed in the Draft EIR, specifically, for example, in Section IV.C.2.a.(2)(a) on page IV.C-5. The Draft EIR explains that the California Endangered Species Act (CESA) was enacted in 1984. The CESA expanded upon the original Native Plant Protection Act and enhanced legal protection for plants, but the Native Plant Protection Act remains part of the California Fish and Game Code. To align with the Federal Endangered Species Act, CESA created the categories of “endangered” and “threatened” species. It converted all animals previously determined “rare” by the California Fish and Game Commission into threatened species in the CESA, but did not do so for rare plants. Thus, these laws provide the legal framework for the protection of California-listed endangered, threatened, and rare plant and animal species. The California Department of Fish and Game (CDFG) implements the Native Plant Protection Act and CESA, and its Wildlife and Habitat Data Analysis Branch maintains the California Natural Diversity Database (CNDDB), a computerized inventory of information on the general location and status of California’s rarest plants, animals, and natural communities, based on information submitted by agencies, researchers, and individuals. During the CEQA review process, the CDFG is given the opportunity to comment on the potential of a project to affect listed plants and animals. CESA is discussed in greater detail on pages 12-13 in Section 2.0 of the General Biological Assessment for Forest Lawn Memorial-Park, Hollywood Hills, attached to the Draft EIR as Appendix C-1. As discussed therein, CESA regulates specific species, as opposed to ecosystems. Among the information included for each regulatory status species evaluated for potential presence on the Project Site in Table 3, Regulatory Status Species, of the General Biological Assessment is each species’ listing status under CESA, if applicable. No CESA-listed species have been observed or detected on the Project Site.

**Comment No. 53-3**

This is a fifty year projected Specific Plan lacking more detailed description of projects and their impacts past a five-year period. The minimal disclosure lacks the criteria to be
approved as part of the Master Plan if the building of these projects exceeds five years after approval of the CEQA documents. This deliberate non-disclosure has significant impacts on the environment, hydrology, cultural resources, biological resources, aesthetics, public services, hazard and hazardous materials, greenhouse gas emissions, utilities, and water supply.

**Response to Comment No. 53-3**

The Project does not include a Specific Plan. A detailed description of the Project is provided in Section II, Project Description, of the Draft EIR. As demonstrated by the impact analyses provided in the Chapter IV of the Draft EIR, the proposed Project will not result in significant impacts associated with hydrology, cultural resources, biological resources, aesthetics, public services, hazards and hazardous materials, greenhouse gas emissions, utilities or water supply. As required by CEQA, the EIR examines all phases of the Project, including planning, construction, and operation. (See Section 15161 of the CEQA Guidelines.) The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 53-4**

The Ecosystem is not addressed as a viable contributor to the Natural Resources of the State of California and the Upper Los Angeles River Watershed and Los Angeles Basin. Here, all trees and wildlife count toward a functioning system. The loss of trees, fauna and wildlife is significant with significant impacts and minimal mitigation.

**Response to Comment No. 53-4**

Section IV.C of the Draft EIR as well as its technical appendices thoroughly analyze Project effects on flora, fauna, wildlife movement and natural tributaries to the Los Angeles River. The General Biological Assessment for Forest Lawn Memorial-Park, Hollywood Hills, attached as Appendix C-1 to the Draft EIR, (Section 3.0 Vegetation and Plant Communities, page 25) acknowledges the special conditions present within oak woodlands and associated riparian communities with regard to microclimate, diversity, and overall ecological complexity, as well as the uniqueness that arises from these conditions. As explained in detail in the General Biological Assessment, woodland communities in cismontane Southern California occur where increased soil moisture allows trees and tree canopies to develop. On south-facing exposures, this phenomenon occurs most frequently in close proximity to streams and in canyons shaded from solar penetration. On north-facing slopes and exposures, such as those found on the Project Site, woodlands tend to exhibit their highest diversity in association with streams. Due primarily to aspect (solar angle) and sometimes other various edaphic (soil) conditions, north-slope woodlands are generally dominated by coast live oak trees not dependent directly on stream-associated moisture. When mature, these woodlands establish a sustainable and complex
III. Responses to Comments

Microclimate. Numerous moisture-dependent shrubs, annual plant species and woodland-dependent wildlife thrive within the relatively moderate temperature regime as compared to adjacent scrub, grassland and chaparral communities. Deep forest soil and forest litter profiles can develop, fostered by microclimatic conditions and enhanced over time by the tree canopy and associated protective elements. The combination of the tree canopy, high amount of overall biomass, deep heterogeneous organic soil layers, prevalence of shade, soil moisture and downed wood, provides a unique and stable habitat for larger mammal, amphibian, avian and invertebrate species. (See page 25 of the General Biological Assessment for Forest Lawn Memorial-Park, Hollywood Hills.)

Potential Project impacts to sensitive habitat were evaluated in Section IV.C, Biological Resources, of the Draft EIR and in the General Biological Assessment, attached as Appendix C-1 to the Draft EIR. The vegetation and plant communities existing on the Project Site are described in detail on pages IV.C-13 to IV.C-18 of the Draft EIR, and potential vegetation community impacts associated with the proposed Project are described on pages IV.C-27 and IV.C-29 of the Draft EIR. In addition, Table IV.C-1, Vegetation Communities on the Project Site, on page IV.C-28 of the Draft EIR, lists each natural vegetation community on the Project Site, its acreage, the acreage impacted by the Project, and regulatory status designation, if any. Figure IV.C-4 on page IV.C-30 of the Draft EIR depicts the vegetation communities that would be affected by the proposed Project. As the Draft EIR explains, of the approximately 120 acres of native vegetation communities present on the Project Site, approximately 18.02 acres of vegetation communities locally designated as a Highest Inventory Community by the City of Los Angeles CEQA Thresholds Guide and/or identified as a CDFG Special Community (or the functional equivalent thereof) would be permanently impacted by the implementation of the proposed Project, including approximately 9.27 acres of western sycamore/coast live oak, approximately 7.64 acres of coast live oak woodland, approximately 0.62 acre of California walnut woodland, approximately 0.39 acre of southern willow scrub/mulefat scrub, approximately 0.05 acre of southern willow scrub, and approximately 0.05 acre of western sycamore/willow riparian forest. Implementation of the proposed mitigation program described in the Draft EIR, including Mitigation Measures C-1 through C-6, Mitigation Measure C-8, and Mitigation Measures C-15 through C-17, would reduce the impacts to these regulatory status vegetation communities to a less-than-significant level. (See page IV.C-29 of the Draft EIR.) The Draft EIR also describes the Project impacts to vegetation communities that are not considered regulatory status, which would be less than significant. (See page IV.C-29 of the Draft EIR.)

As explained in the Draft EIR, the proposed Project would impact approximately 12 acres of riparian-associated habitats (e.g., western sycamore/coast live oak, western sycamore/willow riparian forest, southern willow scrub, mulefat scrub, southern willow scrub/mulefat scrub, and disturbed mulefat scrub) on the Project Site. Most of the Sennett Creek tributaries which would be affected by Project development do not contain surface water during summer months, although the lower reaches of Sennett Creek appear to
support surface water each year. The loss of riparian resources on-site would be off-set both on the Project Site and off-site in the Los Angeles River watershed. Forest Lawn has successfully restored a large portion of Sennett Creek within the Project Site over the past approximately 12 years, and additional restoration is proposed in connection with the Project, including the restoration of an acre of riparian habitat adjacent to Sennett Creek. (See Mitigation Measure C-5 on page IV.C-47 of the Draft EIR.) Also, under the proposed Project, Drainage L, which is currently heavily disturbed, would be enhanced, and Project mitigation includes the creation of an acre of riparian habitat along Drainage L. (See Mitigation Measure C-4 on pages IV.C-46-47 of the Draft EIR.) Mitigation Measure C-2, set forth on page IV.C-46 of the Draft EIR, includes planting of 23 acres of graded slopes on the Project Site with native plant communities, including woodland, chaparral and scrub. Additionally, Mitigation Measure C-6 includes selective revegetation of areas described in Mitigation Measures C-1 through C-5 with the appropriate native species pursuant to a habitat improvement and monitoring program.

In addition, Forest Lawn has entered into an agreement with the Mountains Recreation and Conservation Authority, a joint powers agency of the Santa Monica Mountains Conservancy, for the provision of off-site mitigation (creation/restoration of areas subject to CDFG and Army Corps jurisdiction) in the Los Angeles River watershed in connection with the Project by the Mountains Recreation and Conservation Authority. The resulting improvement to other currently degraded riparian systems in the Santa Monica Mountains and Los Angeles River watershed would provide additional and better quality riparian habitat for plants and animals to successfully become established, resulting in tangible improvements to ecosystems and ecosystem subunits associated with the upper reaches of the Los Angeles River.

The Draft EIR included a full evaluation of biological resources as required by CEQA, including vegetation communities, streams, rare plants, protected trees and wildlife. Implementation of the biological mitigation measures required by the Draft EIR (C-1 through C-17) would reduce Project impacts to a level considered less than significant. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 53-5

The California Water Plan was not addressed.

Response to Comment No. 53-5

The California Water Plan is the state’s strategic plan for managing and developing water resources statewide. Since its first California Water Plan, published in 1957, the Department of Water Resources has prepared eight water plan updates. The California Water Code now requires that the Water Plan be updated every five years. The California
Water Plan and its updates have been an important source of information for water planners, and the California Water Plan serves as a master plan to guide the orderly and coordinated control, protection, conservation, development, management, and efficient use of the water resources of the state. (See pages 1-8 and 1-9 of the 2009 California Water Plan, available at: www.waterplan.water.ca.gov/docs/cwpu2009/0310final/v1c1_intro_cwp2009.pdf.) As explained in the Draft EIR, at the regional level, the Metropolitan Water District updates its Integrated Resources Plan every five years and also prepares a Regional Water Urban Management Plan pursuant to the Urban Water Management Planning Act. (See page IV.K-31 of Section IV.K.2, Public Utilities—Water, of the Draft EIR.) In addition, as described on pages IV.K-32 and IV.K-33 of the Draft EIR, the Metropolitan Water District's planning efforts also include the Water Surplus and Drought Management Plan, the Water Supply Allocation Plan, and a Five Year Supply Plan. Similarly, as noted on page IV.K-33 of the Draft EIR, the LADWP publishes an Urban Water Management Plan every five years in accordance with the Urban Water Management Planning Act. LADWP also published a Water Supply Action Plan in 2008 to provide a blueprint for creating sustainable sources of water for the future of Los Angeles through the year 2030. (See page IV.K-34 of the Draft EIR.)

Through Urban Water Management Plans, water suppliers report their water use and supplies. The Department of Water Resources will use information from the latest Urban Water Management Plans as a comprehensive database to support the next California Water Plan Update. (See page F-1 of the California Department of Water Resources, Guidebook to Assist Urban Water Suppliers to Prepare a 2010 Urban Water Management Plan.)

**Comment No. 53-6**

Greenhouse gas under CEQA is not addressed in relationship to SB 97 requirements.

**Response to Comment No. 53-6**

Greenhouse gas (GHG) emissions are addressed in Section IV.B.2, Air Quality—Greenhouse Gas Emissions, of the Draft EIR. As discussed on page IV.B-35 of the Draft EIR, California Senate Bill 97 is designed to work in conjunction with CEQA and AB 32, and it required the Office of Planning and Research (OPR) to prepare and develop guidelines for the mitigation of GHG emissions. Based on these efforts, the following two questions relating to the effects of GHGs were added to the CEQA Guidelines, Appendix G (Environmental Checklist), as discussed and set forth on page IV.B-38 of the Draft EIR:

- Would the project:
  - Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
• Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs?

As explained in the Draft EIR, notably, the GHG CEQA Guidelines amendments do not establish a significance threshold for GHG emissions. According to the Final Statement of Reasons for Regulatory Action:27

[N]othing in either AB 32 or SB 97 requires a finding of significance for any particular level of increase in greenhouse gas emissions. AB 32, and regulations implementing that statute, will require reductions in emissions from certain sectors in the economy, but do not preclude new emissions.

Instead, as explained on pages IV.B-39 and IV.B-44 of the Draft EIR, the GHG CEQA Guidelines call for a lead agency to establish significance thresholds for their respective jurisdiction or determine the significance of a project on a case-by-case basis. The lead agency should use its “careful judgment” in making the determination of significance,28 and should make a “good-faith” effort to “describe, calculate or estimate” the amount of GHGs that will result from the project.29 The lead agency may rely on a qualitative analysis or performance based standards for its determination.30 A lead agency should also “consider” the following factors, among others, when assessing the significance of impacts from GHGs: (1) the extent to which the project may increase or reduce GHGs; (2) whether the GHG emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, local plan for the reduction or mitigation of GHG emissions.31 These factors were considered in the GHG analysis prepared for the Draft EIR (see pages IV.B-44 through 48 of the Draft EIR) and based on these factors the Draft EIR concludes that the Project’s GHG emissions represent a less-than-significant impact on the environment and would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

28 GHG CEQA Guidelines § 15064.4(a).
29 Ibid.
30 GHG CEQA Guidelines § 15064.4(a)(1)-(2).
31 GHG CEQA Guidelines § 15064.4(b).
Comment No. 53-7

Greater Los Angeles Integrated Regional Water Management Plan IRWMP is not addressed as water supply and quality are incorporated on a regional basis as well as wastewater planning and flood planning as well as Total Daily Maximum Loads TMDLS.

Response to Comment No. 53-7

The Greater Los Angeles Integrated Regional Water Management Plan (IRWMP) was prepared in 2006 with the purpose of defining a clear vision and direction for the sustainable management of water resources in the Greater Los Angeles County Region for the next 20 years, presenting basic information regarding the possible solutions and the costs and benefits to those solutions and inspiring the Region and potential funding partners outside of the Region. The IRWMP is a collaborative effort by numerous Southern California jurisdictions to ensure sustainable water supply through the more efficient uses of water, the protection and improvement of water quality and environmental stewardship, including habitat restoration.

The IRWMP is a regional plan that is not directly applicable to the proposed Project, but does provide additional background as to how various agencies, including the City of Los Angeles, are collaborating to address water supply, water quality, and environmental stewardship. Section IV.L.2, Public Utilities–Water, of the Draft EIR, includes a discussion of numerous other plans that address water resources including MWD’s Urban Water Management Plan, MWD’s Integrated Resources Plan, MWD’s Water Surplus and Drought Management Plan, MWD’s Water Supply Allocation Plan, MWD’s Five Year Supply Plan, LADWP’s Urban Water Management Plan and LADWP’s Securing L.A.’s Water Supply. As explained in Section IV.L.2, Public Utilities–Water, of the Draft EIR, the proposed Project would not result in significant impacts associated with water supply.

Wastewater planning and wastewater capacity are specifically addressed in Section IV.K.1, Public Utilities-Wastewater, of the Draft EIR. Included in the analysis is a discussion of the City’s Integrated Resources Plan, which incorporates a Wastewater Facilities Plan to address wastewater demand and capacity. (See pages IV.K-5 through IV.K-7 of the Draft EIR.) As discussed in Section IV.K.1, Public Utilities-Wastewater, the proposed Project would not result in significant impacts associated with wastewater.

Flood planning is addressed in Section IV.G, Hydrology/Water Quality, of the Draft EIR. As discussed therein, the proposed Project would upgrade numerous storm drain systems. Based on post-development hydrology calculations, the design runoff from the Project Site would be managed so as not to exceed the recommended and allowable runoff flows determined by the Los Angeles County Department of Public Works. (See pages IV.G-22 and IV.G-23 of the Draft EIR.) Therefore, the Draft EIR concludes that Project impacts related to surface water runoff and flooding would be less than significant.
Water quality is also addressed in Section IV.G, Hydrology/Water Quality, of the Draft EIR. As discussed on page IV.G-24, the anticipated quality of effluent expected from the Project Site would not contribute loads or concentrations of pollutants of concern that would be expected to cause or contribute to a violation of the water quality standards in the Project’s receiving waters. In addition, the Project’s compliance with the Standard Urban Stormwater Mitigation Program requirements and implementation of the BMPs would ensure the Project is in compliance with the Total Maximum Daily Load requirements for the Los Angeles River Channel watershed. Therefore, no significant impacts to surface water quality are anticipated.

Comment No. 53-8
This Master Plan does not conform with the General Plan.

Response to Comment No. 53-8

As explained in Section IV.H, Land Use Planning, of the Draft EIR, the proposed Project would be consistent with all Elements of the City of Los Angeles General Plan. Table IV.H-2, City of Los Angeles General Plan Consistency Analysis, on pages IV.H-19-25 of the Draft EIR, identifies the proposed Project’s consistency with those Elements of the General Plan, including the Conservation, Open Space, Transportation, Safety and Noise Elements, which contain policies that are generally applicable to the proposed Project.

As explained in the Draft EIR, the proposed Project is also consistent with the Land Use Element of the City of Los Angeles General Plan. The Land Use Element of the City of Los Angeles General Plan is divided into 35 Community Plans. Each Community Plan is intended to implement the policies of the General Plan Framework at the community level. As noted on page IV.H-5 of the Draft EIR, the proposed Project is within the boundaries of the Hollywood Community Plan area. Table IV.H-1, Hollywood Community Plan Consistency Analysis, on page IV.H-18 of the Draft EIR, analyzes the proposed Project’s consistency and compatibility with the applicable policies of the Hollywood Community Plan. As explained in the Draft EIR, the Project would be consistent with the land use designation for the Project Site set forth by the adopted Hollywood Community Plan and with the policies and objectives of the adopted Hollywood Community Plan. As the Draft EIR concludes on page IV.H-17, land use compatibility impacts with respect to the General Plan would be less than significant.

Comment No. 53-9
Oversized trucks and the damage incurred on roads and pipes have not been addressed.
Response to Comment No. 53-9

As explained on page IV.J-9 in Section IV.J, Traffic, Circulation, and Parking, of the Draft EIR, LADOT considers construction-related traffic effects as adverse but not significant impacts because such effects, while sometimes inconvenient, are intermittent and temporary in nature. Additionally, LADOT requires implementation of worksite traffic control plans to ensure that any construction-related effects are minimized. Project construction-related traffic would consist of construction equipment, including haul trucks, and construction employee vehicles. All construction equipment would be staged on-site, and all construction employees would park on-site. As described in Section II, Project Description, of this Draft EIR, the Project will include a request for a haul route permit to export approximately 713,000 cubic yards of soil from the Project. The Project also includes a request for a second haul route permit for the export of approximately 400,000 cubic yards of soil from the Project Site in connection with grave preparation over the life of the Project (i.e., through 2050 and beyond). All construction activities would be performed in accordance with all applicable policies with respect to building construction and activities, including the Department of Building and Safety’s “Good Neighbor Construction Practices,” to minimize construction related impacts on the surrounding community. These practices will include parking construction vehicles on-site, using flag persons and warning signs during haul truck entry/exit from the construction site, properly filling concrete trucks during deliveries, and cleaning construction debris from public rights-of-way, among other measures. With adherence to regulatory requirements and the worksite traffic control plan, pipes are not expected to be damaged as part of construction activities.

Comment No. 53-10

Landfills have not been addressed. The five year construction period addresses 3.3 million cubic yards of earth. The document does not address the earth to be moved with the construction past that period.

Response to Comment No. 53-10

Solid waste and landfill capacity are addressed in detail in Section IV.K.4, Solid Waste, of the Draft EIR. Landfills are discussed on pages IV.K-58 through IV.K-62 of the Draft EIR, and Figure IV.K-1, County of Los Angeles Landfills, on page IV.K-57 depicts the location of landfills in relation to the Project Site. In addition, Table IV.K-9, Landfill Capacity and Intake, on page IV.K-60 of the Draft EIR, sets forth in table form information regarding existing landfill facilities, their estimated closure dates, permitted daily intake, average daily intake, and remaining permitted daily intake. As indicated in Section IV.K.4, sufficient landfill capacity would be available to accommodate the solid waste generated by construction and operation of the proposed Project, and the proposed Project’s impacts with respect to solid waste would be less than significant.
To clarify, the Project proposes approximately 2.7 million cubic yards of grading over a 15-year construction period (approximately 1,728,000 cubic yards of cut and approximately 1,015,000 cubic yards of fill). The net export amount would be approximately 713,000 cubic yards. In addition, up to 400,000 cubic yards of dirt would be exported in connection with grave preparation through 2050. (See page II-11 of Section II, Project Description, of the Draft EIR.)

As noted on page IV.K-73 of the Draft EIR, the soil within the Project Site has been determined to be generally suitable for export to other locations in need of suitable fill material. Thus, it is not anticipated that the estimated 713,000 cubic yards of soil export during the 15-year construction period or the approximately 400,000 cubic yards generated in connection with grave preparation through 2050 would be disposed of at an inert landfill. Rather, it is anticipated that the majority of this soil would be used as fill in other construction projects throughout the region where suitable fill material is required. Nonetheless, as noted on page IV.K-73 of the Draft EIR, inert landfill disposal capacity in Los Angeles is plentiful. Based on the 2008 Los Angeles County Integrated Waste Management Plan annual report, there is an estimated remaining capacity of 56.95 million tons at the two primary unclassified landfills that serve the City of Los Angeles. Thus, if exported soil from the Project Site were to be disposed of inert landfills, sufficient capacity would be available. Therefore, the proposed Project would not adversely impact the remaining available capacity at inert landfills.

**Comment No. 53-11**

Griffith Park viewsheds [sic] more than the Hollywood sign. The property is an Indenture, not a donation and is subject to the terms:

“To be used as a PUBLIC PARK for purposes of recreation; health and pleasure, for the use and benefit of the inhabitants of the said City of Los Angeles, forever, -

And this gift and grant is made and said property is hereby conveyed upon condition that said land shall be used and maintained by said City of Los Angeles and its successors in interest and estate, exclusively as a public park and pleasure ground, for the amusement, recreation, health and pleasure of its inhabitants, and upon further condition that the name of said park now established by ordinance of said City, to-wit, ‘Griffith Park’ be continued as the official name and designation of said park; and whenever said tract of land hereby conveyed, or any part thereof shall cease to be used as a park, and for pleasure, amusement, recreation, health and uses incident to the aforesaid uses according to the intents and meanings of the same, and if said City or its successors in interest or estate shall act any time change the official name of said park from ‘Griffith Park’ to some other
name or designation then the lands hereby conveyed shall immediately upon the happening of either of said events, revert to said parties of the first part or to their heirs."

Viewsheds are part of the pleasure of the Hollywood Hills and Griffith Park.

**Response to Comment No. 53-11**

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. As noted in the Draft EIR, most of Griffith Park was originally donated to the City by Colonel Griffith J. Griffith in 1896, and the park boundaries include Griffith’s original donation. In addition, however, the portion of Griffith Park immediately adjacent to the southern boundary of the Project Site, consists of two large parcels (approximately 189 acres) which were deeded to the City by Forest Lawn in 1987 and 2003. (See page 6 of the Impacts Assessment prepared by LSA Associates and attached to the Draft EIR as Appendix D-2.)

With respect to Griffith Park viewsheds, as discussed in Section IV.A, Aesthetics, of the Draft EIR, areas surrounding the Project Site, including Griffith Park, were visually surveyed to identify locations where prominent public views of the Project Site were available. Several locations within Griffith Park, including Mount Hollywood Drive, the Toyon Trail, Mount Lee, and Mount Chapel, offer public views of the Project Site. (See Draft EIR pages IV.A-21–A-26.) As explained on page IV.A.42 of the Draft EIR, Project improvements would be visible from public vantage points in Griffith Park south and southeast of the Project Site due to the elevated position of such vantage points above the Project Site.

However, as noted in the Draft EIR, Project grading would take place in three general phases and would include areas that are already partially graded. All grading that occurs at the southern end of the Project Site would blend in visually with existing topographical features. As a result, the proposed Project’s final grading and development of these areas would result in more visually uniform contouring throughout the Project Site and would also improve the consistency of the visual character of the Project Site by introducing a final grading design that visually transitions the Project Site with the natural topography of the Project area.

With respect to views of the Project’s proposed structures, as explained on page IV.A-43 of the Draft EIR, new construction would incorporate the use of design standards consistent with the existing form, color and materials which typify existing site improvements within the Forest Lawn Memorial-Park–Hollywood Hills property. Further, the architectural scale and massing of the proposed structures would be compatible with the existing structures and development on the Project Site. One of the Project’s structures, the proposed tower feature, would rise to a height of up to 90 feet, which is taller
than existing and proposed on-site structures. However, from the higher elevation at which the Griffith Park vantage points are located, the difference in height would not be prominent from these vantage points. The Project also proposes mausoleums in the Central and West Areas, which would be comprised of two to five levels for interment areas. Each level of the proposed mausoleums would be approximately 20 feet, and they may be built incrementally as additional interment space is needed. The mausoleums may include a central feature to provide access to all five levels that may reach up to 100 feet in height. Given the historical context of the Forest Lawn Memorial-Park–Hollywood Hills property, as well as the topography and the employment of the above mentioned design standards, the proposed structures would remain visually compatible with those uses. The proposed Project would provide lawn and garden area landscaping consistent with the existing site development within the developable areas of the Project Site, and groundcover within the undevelopable slope and drainage areas. As such, the Draft EIR concludes that impacts to visual character and viewsheds from vantage points south of the Project Site would be less than significant.

Comment No. 53-12

Not described is the Public Benefit and Development Agreement. We cannot determine environmental impacts without any information.

Response to Comment No. 53-12

As noted on page II-21 of the Project Description of the Draft EIR, a Development Agreement is proposed as part of the proposed Project. A Development Agreement provides assurances to both the City and the property owner regarding the regulations applicable to the property and the specified public benefits to be provided by the property owner. With respect to the Public Benefit approval requested as part of the Project, as explained on page IV.H-9 of Section IV.H, Land Use Planning, of the Draft EIR, in the year 2000, the Los Angeles Municipal Code was revised to identify cemeteries as a public benefit use permitted in any zone or location, unless otherwise restricted, so long as specific performance standards or approved alternative compliance measures are met. Specific performance standards are specified for cemetery uses to ensure that their landscaping, open space, scale, bulk, height, yards and setbacks (particularly with regard to the main building) are similar to those in the adjacent properties in the neighborhood. The public benefit performance standards for cemeteries are set forth on page IV.H-10 of the Draft EIR. (See also Section 14.00 A.1(b) of the Los Angeles Municipal Code.) The Project’s conformance with the performance standards is analyzed on pages IV.H-26 through IV.H-29 of the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment No. 53-13

The project site is designated as a Methane Zone. Is there any planned development of natural gas storage. What mitigation measures have been made to scientifically monitor and verify (by a licensed practitioner) any migrating gases. How will groundwater be impacted. How will Air Quality be mitigated (please note EPA proposed denial of parts of 2007 SQAMD Air Quality Plan).

Response to Comment No. 53-13

As the Draft EIR notes on page IV.F-14 of Section IV.F, Hazardous Materials/Risk of Upset, the Project Site is located in an identified City of Los Angeles Methane Zone. As discussed in the Draft EIR, the Project Site has four former disposal areas that were used primarily for green waste. The generation of landfill gases has been evaluated and localized methane gas has been detected within the former disposal areas. The proposed Project’s development areas are located within the vicinity of Former Disposal Area 2. As such, as noted on page IV.F-18 of the Draft EIR, there is a possibility that ground-disturbing activities in this area could result in methane exposure to workers. However, as discussed in the Draft EIR, each of these former disposal areas is subject to a Post-Closure Land Use Plan approved by the LEA. The Post-Closure Land Use Plan includes conditions to protect workers from methane exposure during work in the vicinity of these areas. In addition, Cal-OSHA regulates worker exposure to airborne contaminants (such as methane gas) during construction. All ground-disturbing activities occurring in the vicinity of Former Disposal Area 2 would be completed in a manner consistent with the conditions of the Post-Closure Land Use Plans and with applicable Cal-OSHA regulations, which ensure consideration of worker safety during construction activities. Specifically, ground-disturbing activities within the vicinity of these areas would be monitored for the presence of methane gas. If methane levels are found to threaten worker safety, protection measures would be implemented in accordance with Cal-OSHA requirements. Therefore, impacts related to worker safety as it pertains to soil gases would be less than significant. With respect to Project operation, as discussed on page IV.F-19 and IV.F20 of the Draft EIR, the potential presence of landfill gases presents a physical hazard that should be monitored when performing routine earthwork activities such as grading and excavation activities, as well as during interments, near or within the former disposal areas. As noted above, the Project will comply with the requirements of the Post-Closure Land Use plans as required by the LEA. All ground-disturbing activities would be completed in accordance with the conditions of the Post-Closure Use Plans and all applicable Cal-OSHA regulations and requirements. These measures ensure consideration of worker safety during ground-disturbing activities by monitoring methane exposure and implementing protective measures when necessary. Therefore, with implementation of these measures, impacts would be reduced to less-than-significant levels. In addition, as noted on page IV.F-20 of the Draft EIR, the City of Los Angeles Department of Building and Safety may require methane mitigation for new occupiable buildings constructed on the Project Site if it determines that a hazard may exist from methane intrusion. Prior to development of new occupiable buildings, the Project
would comply with the City of Los Angeles Methane Seepage Regulations as required by the City Department of Building and Safety. With compliance with the post-closure use plans and requirements of the City of Los Angeles Department of Building and Safety, the Draft EIR concludes that potential impacts associated with the accidental release of methane gas would be mitigated to a less-than-significant level.

With respect to groundwater, as noted on page IV.F-4 of the Draft EIR, groundwater at the Project Site was previously measured at depths ranging from approximately 23 feet below ground surface (bgs) in the eastern portion of the Project Site to over 58 feet bgs along the boundary with Mount Sinai Memorial Park. Because of reported heavy rainfall during the time of drilling for those previous measurements, the measured stabilized groundwater levels are expected to represent a high groundwater condition. Calculated groundwater elevations from historical data suggest a general groundwater flow direction to the north-northwest. As explained on page IV.G-21 of Section IV.G, Hydrology/Water Quality, of the Draft EIR, dewatering is not anticipated to be required in any of the grading areas in connection with the Project. However, should dewatering be required, discharges from any temporary dewatering operations associated with construction activities would be covered under a NPDES General Dewatering Permit, which authorizes such construction-related activities so long as all conditions of the permit are fulfilled. As indicated in the Draft EIR, prior to construction, the Applicant would be required to obtain a General Construction Permit from the LARWQCB. If any dewatering activities are planned to occur, the Draft EIR concludes that compliance with the Waste Discharge Requirements in the dewatering general permit and final design of the dewatering system to minimize any off-site influence to groundwater, would ensure potential impacts associated with dewatering operations on groundwater quality are less than significant.

As discussed more fully in Sec. IV.B.1, Air Quality, of the Draft EIR, the construction and operation of the proposed Project would result in less-than-significant air quality impacts. Therefore, as stated on page IV.B-27 of the Draft EIR, no mitigation measures are required. Nonetheless, as discussed on page IV.B-21 of the Draft EIR, the Project includes as a project design feature to be implemented during construction that all scrapers and dozers shall be equipped with Tier 4 Interim engines for Phases 1, 2, and 3, and all other grading construction equipment shall be equipped with Tier 3 engines for Phases 1 and 2, or alternative measures shall be implemented to achieve an equivalent reduction of maximum daily NOx emissions. In addition, the Project includes as a project design feature the development of a temporary, aboveground irrigation system to regularly water the construction stockpile in the West Area. On November 22, 2010, U.S. EPA published its notice of proposed partial approval and partial disapproval of the 2007 Air Quality Management Plan (AQMP) PM2.5 Plan. The proposed disapproval is primarily because the attainment demonstration relies heavily on emissions reductions from several State rules that have not been finalized or submitted to U.S. EPA for approval. The SCAQMD CEQA thresholds for regional and localized PM2.5 used in the Draft EIR would not be affected by the partial approval of the 2007 AQMP.
Comment No. 53-14  
Will there be enough Fire Department and Emergency Medical Staff available during emergencies as well as Police.

Response to Comment No. 53-14  
As explained on page IV.L-7-9 in Section IV.L, Public Services—Fire Protection, of the Draft EIR, the Los Angeles Fire Department has indicated that existing staffing and resources are considered adequate to meet the Project area’s proposed demand for fire and EMS services in the Hollywood Community Plan Area. As the Draft EIR notes, the Los Angeles Fire Department has indicated that the Project Site’s demand for fire protection services is unique for several reasons. For example, the Forest Lawn Memorial-Park–Hollywood Hills property is a low-density, low-intensity cemetery land use that employs relatively few employees (as compared to other commercial, retail, or service uses of comparable size), and the majority of the Memorial-Park’s active uses are outdoors where there is no potential for structure fire. Further, the majority of the structures proposed under the Project are non-occupiable structures for such uses as burial gardens, wall crypts, and columbaria and are required to be constructed with non-flammable building materials such as concrete, masonry, and stone. In addition, as noted in Section IV.J, Traffic, Circulation and Parking, of the Draft EIR, the Project would generate negligible (if any) new traffic trips. As such, the Project would not impede emergency response by significantly impacting roadway intersections in the Project vicinity. Thus, as the Draft EIR concludes, impacts on fire protection services would be less than significant.

As noted on page I-3 of the Draft EIR, police protection services was among the issues that were determined by the Initial Study not to be significantly impacted by the proposed Project and is therefore not analyzed in detail in the Draft EIR. As explained further on page V-4 in Section V, General Impact Categories, of the Draft EIR, and discussed in the Initial Study provided in Appendix A of the Draft EIR, the proposed Project would not result in substantial employment or population growth, nor an increase in the number of daily visitors to the Project Site, that could generate an increased demand for police protection. Therefore, no impacts with respect to police protection services would occur.

Comment No. 53-15  
What will be the impact on the LA River and the Oceans.

Response to Comment No. 53-15  
As explained on page IV.G-17 in Section IV.G, Hydrology/Water Quality, of the Draft EIR, the proposed Project includes a number of specific Project Design Features (PDFs) that would be implemented to reduce or avoid water quality impacts and hydrologic...
impacts. These PDFs include site design, source control, and treatment control Best Management Practices (BMPs) that would be incorporated into the proposed Project and are thereby considered a part of the proposed Project for purposes of impact analysis. Site design and source control BMPs help to manage the quantity and quality of both wet and dry weather runoff by limiting the frequency of occurrences and decreasing pollutant concentration. Treatment control BMPs are designed to remove pollutants once they have been mobilized by rainfall and runoff. The site design, source control, and treatment control PDFs for the proposed Project are discussed in greater detail on pages IV.G-17 through IV.G-19 of the Draft EIR. As noted on page IV.G-23 of the Draft EIR, implementation of these PDFs, including site design, source control and treatment control BMPs, would ensure that potential impacts to surface water quality would be less than significant.

As noted on page IV.G-24 of the Draft EIR, for purposes of assessing the proposed Project’s impacts to surface water quality, the geographic limits of the area of potential affect include the receiving waters of on-site tributaries, Sennett Creek and the Los Angeles River Flood Control Channel. As discussed in the Draft EIR, the anticipated quality of effluent expected from the Project Site would not contribute loads or concentrations of pollutants of concern that would be expected to cause or contribute to a violation of the water quality standards in the Project’s receiving waters. In addition, the Project’s compliance with the Standard Urban Stormwater Mitigation Program requirements and implementation of the BMP measures discussed above would ensure the project is in compliance with the TMDL requirements for the Los Angeles River Channel watershed.

Comment No. 53-16

Groundwater mitigation measures need to be addressed. Will there be additional salinity and therefore more mitigation required.

Response to Comment No. 53-16

As explained on page IV.G-21 of Section IV.G, Hydrology/Water Quality, of the Draft EIR, dewatering is not anticipated to be required in any of the grading areas in connection with the Project. However, should dewatering be required, discharges from any temporary dewatering operations associated with construction activities would be covered under a NPDES General Dewatering Permit, which authorizes such construction-related activities so long as all conditions of the permit are fulfilled. As indicated in the Draft EIR, prior to construction, the Applicant would be required to obtain a General Construction Permit from the LARWQCB. If any dewatering activities are planned to occur, the Draft EIR concludes that compliance with the Waste Discharge Requirements in the dewatering general permit and final design of the dewatering system to minimize any off-site influence to groundwater, would ensure potential impacts associated with dewatering operations on groundwater quality are less than significant.
As discussed in Response to Comment No. 53-15, the proposed Project includes a number of specific Project Design Features (PDFs) that would be implemented to reduce or avoid water quality impacts and hydrologic impacts. These PDFs include site design, source control, and treatment control Best Management Practices (BMPs) that address salinity, among other potential issues. These PDFs would be incorporated into the proposed Project and ensure that potential impacts with respect to water quality would be less than significant.

**Comment No. 53-17**

The Hollywood Community Plan addresses:

“OBJECTIVES OF THE PLAN

2. To designate lands at appropriate locations for the various private uses and public facilities in the quantities and at densities required to accommodate population and activities projected to the year 2010.”

The project is not in compliance.

**Response to Comment No. 53-17**

The policy referred to in this comment regards planning activities to be implemented by the City of Los Angeles. As noted in Response to Comment No. 53-7, the proposed Project would be consistent with the land use designation for the Project Site, which would provide for the activities contemplated by the Project. In addition, Table IV.H-1, Hollywood Community Plan Consistency Analysis, on page IV.H-18 of the Draft EIR, identifies the proposed Project’s consistency and compatibility with the applicable policies of the Hollywood Community Plan. As the Draft EIR concludes on page IV.H-17, land use consistency impacts with respect to the Hollywood Community Plan would be less than significant. Also, to the extent the comment is referring to the 2010 reference in the current Hollywood Community Plan, as explained on page IV.H-5 of the Draft EIR, the Hollywood Community Plan was adopted in 1988 and is currently in the process of being updated by the Department of City Planning. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment Letter No. 54

Rev. Patricia Farris
Senior Minister
First United Methodist Church of Santa Monica
1008 11th St.
Santa Monica, CA  90403

Comment No. 54-1

I am writing to express my support of Forest Lawn’s proposed expansion. This expansion will permit Forest Lawn to continue to serve all the people of the Los Angeles metropolitan area with the same loving care and dignity as they have for so many years.

Families from all across the region use the services of Forest Lawn because of their professionalism and compassion, as well as for the beauty of the cemetery itself.

I urge your positive endorsement of this project to allow Forest Lawn additional space which will be to the benefit of our area’s families.

Response to Comment No. 54-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 55

Sara Fisk
New Valley Symphony Orchestra
P.O. Box 57018
Sherman Oaks, CA 91413

Comment No. 55-1

I’m writing in support of the Forest Lawn–Hollywood Hills proposed Master Plan as was detailed in the Draft Environmental Impact Report. It seems to me that this plan will ensure that Forest Lawn can continue to offer its services to those families in need at such a vulnerable time in their lives.

Forest Lawn has a long tradition of providing facilities and programs for schools and community organizations, such as the New Valley Symphony Orchestra. I’m glad to know that they are committed to continuing that tradition as so many of us who have benefited from these services truly appreciate their generosity.

Forest Lawn not only provides an essential service they are a valued member of the community and deserving of our support.

Response to Comment No. 55-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 56

Carolee Flowers-Skinner  
5400 Arbor Vitae St. #104  
Los Angeles, CA  90045

Comment No. 56-1

Forest Lawn–Hollywood Hills’ Master Plan is an important project that deserves your support and approval. The community will benefit in innumerable ways from the project, namely the construction of new facilities and the development of much-needed burial property within the existing memorial park.

Allowing Forest Lawn to build upon an undeveloped portion of its existing 444-acre site is a win-win for the community. It allows residents to bury their loved ones nearby at one of the few facilities that doesn’t give any regard to religious preferences or beliefs. The plan allows Forest Lawn to continue doing what it does best – meeting the community’s needs for funeral services and interment resources.

Plans for a new and expanded reception areas, as well as new burial property, including mausoleums and wall crypts, will allow Forest Lawn to meet the region’s growing needs.

I hope you will give Forest Lawn your full support and approval.

Thank you for your time and consideration.

Response to Comment No. 56-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 57

Ellen Franklin
Executive Director
Temple Judea
5429 Lindley Ave.
Tarzana, CA  91356
6601 Valley Circle Blvd.
West Hills, CA  91307

Comment No. 57-1

Los Angeles is a melting pot of peoples, cultures and traditions representing many different religious beliefs and approaches to death and internment or cremation. Forest Lawn has a long history of serving the needs of our community regardless of belief, which is why I personally support this project.

The Draft Environmental Impact Report (DEIR) shows that the proposed project will continue the tradition of providing the resources that suit each individual family supporting their particular custom or rituals. The DEIR also revealed that there are no significant or unavoidable impacts associated with the construction or operation of the project. Additionally, Forest Lawn has committed to ecological enhancements such as planting live oak and black walnut trees on the site, as well as conserving natural habitat on the property.

I should add that Forest Lawn has been a great neighbor to Temple Judea, allowing us to use the Hall of Liberty for our annual High Holy Day services, for some 20 years now. While I cannot speak for my entire congregation, I personally support the ongoing work of Forest Lawn and this Master Plan.

Response to Comment No. 57-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 58

Mark Gaiys  
14363 Mulholland Dr.  
Los Angeles, CA 90077

Comment No. 58-1

The more I learn about Forest Lawn–Hollywood Hills' proposed Master Plan, the more concerned I become about what will happen if this important project doesn’t move forward.

According to the Draft Environmental Impact Report, interment sites will be in short supply and depleted within just a few years and the remaining available sites at Forest Lawn will be depleted even sooner. This will require many of us to travel far distances to be near loved ones – a real shame, particularly since we live near a facility as beautiful and peaceful as Forest Lawn.

Forest Lawn has been a wonderful presence in the community, serving the needs of everyone regardless of religious beliefs. It would be unfortunate if the facility could not expand on its existing property and continue to serve the needs of our community.

Response to Comment No. 58-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 59

Tasha Gailys
14363 Mulholland Dr.
Los Angeles, CA 90077

Comment No. 59-1

The more I learn about Forest Lawn–Hollywood Hills’ proposed Master Plan, the more concerned I become about what will happen if this important project doesn’t move forward.

According to the Draft Environmental Impact Report, interment sites will be in short supply and depleted within just a few years and the remaining available sites at Forest Lawn will be depleted even sooner. This will require many of us to travel far distances to be near loved ones – a real shame, particularly since we live near a facility as beautiful and peaceful as Forest Lawn.

Forest Lawn has been a wonderful presence in the community, serving the needs of everyone regardless of religious beliefs. It would be unfortunate if the facility could not expand on its existing property and continue to serve the needs of our community.

Response to Comment No. 59-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 60

Jesus Garber
3307 Ledgewood Dr.
Los Angeles, CA  90068

Comment No. 60-1
I am writing to comment on Forest Lawn–Hollywood Hills’ draft Environmental Impact Report and express my support for the project.

The draft EIR did a nice job of providing an overview of the project. I'm pleased that the expansion will not alter the look of the memorial park and that Forest Lawn will continue to use recycled water for landscape irrigation, reducing demand for potable water supplies. Forest Lawn is also to be congratulated for promising to enhance the local ecology by planting live oak and black walnut trees and preserving natural habitats.

In addition, I'm pleased that construction traffic will be limited to Forest Lawn Drive to the Ventura Freeway and will not make its way into residential and business areas.

The draft EIR made a strong case for why Forest Lawn’s plans should move forward. I hope you and your colleagues agree.

Response to Comment No. 60-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 61

Dale J. Goldsmith, Esq.
Armbruster Goldsmith & Delvac LLP
11611 San Vicente Blvd., Ste. 900
Los Angeles, CA  90049
www.agd-landuse.com

Comment No. 61-1

Email 1: Can you please confirm the date that the public comment period will close on the Forest Lawn Memorial Park Hollywood Hills Master Plan Draft EIR?

City Response: The public comment period for the Forest Lawn Memorial Park–Hollywood Hills Master Plan has been extended by an additional 15 days to Wednesday, April 13, 2011. A revised Notice of Preparation with the new closing date will be distributed shortly.

Response to Comment No. 61-1

In response to requests made by interested parties, the original comment period was extended for an additional 15 days, for a total comment period of 60, which exceeds the 45-day public review period required by CEQA Guidelines Section 15105 when a Draft EIR is submitted to the State Clearinghouse for review by State agencies.
Comment Letter No. 62

Myra Gosda
5961 Chula Vista Way, Apt. 3
Los Angeles, CA  90068

Comment No. 62-1
Forest Lawn’s expansion project is important to the community and I sincerely hope you will give it strong consideration.

My understanding is that without the project, the memorial park will run out of interment sites in about five to six years. According to the draft Environmental Impact Report, the supply of interment sites in the surrounding areas is also diminishing and may be exhausted within seven years. That means community members will have to travel further distances to be near loved ones unless something is done.

Forest Lawn is, and has been, an important part of this community. Please allow the memorial park to add to its interment sites within their existing property so the needs of the community can continue to be met.

I thank you for your time and consideration.

Response to Comment No. 62-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 63

Pastor Jack W. Hayford
The Church On The Way
nllove@kingsuniversity.edu

Comment No. 63-1
As Founding Pastor of The Church On The Way – today a San Fernando Valley congregation of over 15,000 members – I am writing to express my support of Forest Lawn’s proposed expansion at Hollywood Hills. Families from all across the region use the services of Forest Lawn because of their professionalism and compassion, as well as for the beauty of the cemetery itself.

This expansion will permit Forest Lawn to continue to serve all the people of the Los Angeles metropolitan area with the same loving care and dignity as they have for so many years.

With the continued population growth of the Valley, the practical need for anticipating future need recommends the proposal. I urge your positive endorsement of this project to allow Forest Lawn additional space which will be to the benefit of our area’s families.

Response to Comment No. 63-1
The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 64

Tammy Huber
14363 Mulholland Dr.
Los Angeles, CA  90077

Comment No. 64-1
The more I learn about Forest Lawn–Hollywood Hills’ proposed Master Plan, the more concerned I become about what will happen if this important project doesn’t move forward.

According to the Draft Environmental Impact Report, interment sites will be in short supply and depleted within just a few years and the remaining available sites at Forest Lawn will be depleted even sooner. This will require many of us to travel far distances to be near loved ones – a real shame, particularly since we live near a facility as beautiful and peaceful as Forest Lawn.

Forest Lawn has been a wonderful presence in the community, serving the needs of everyone regardless of religious beliefs. I personally owe a great deal to Forest Lawn. I visit the cemetery at least once a week to spend time at my husband, Carl Huber’s, gravesite. Carl is a war veteran who died on November 24, 2009. I was offered giving him a full military burial at a national cemetery and a plot at no charge. The nearest such cemeteries are in Riverside County and Orange County. I declined the offer because I intended to visit my husband frequently and felt more comfortable coming to Forest lawn, even though I had to pay. I made that choice without hesitation and I am glad I did. Now, I bring my two grandsons, Grant (5) and Cole (1), to visit and tell them stories about their Papa. The lovely surroundings and tranquility of the area give me peace after a very painful loss. It would be unfortunate if the facility could not expand on its existing property and continue to serve the needs of our community.

Response to Comment No. 64-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 65

Steven Kerstein
Music Director & Conductor
Burbank Philharmonic Orchestra

Comment No. 65-1

When you visit Forest Lawn–Hollywood Hills, it is a place of calm and serenity. Yet it also incorporates carefully planned design principles that are critically important for cemetery development.

The Draft EIR for the Forest Lawn project reflects those design principles through the provision of internal roadways that allow for safe entry and exit of parked vehicles by visitors, many of whom are elderly. The new facilities also are designed so that the maximum walking distance from the roadway to a burial site is 300 feet or less in order to accommodate seniors and the disabled. And, roadway widths are designed to allow for funeral parking on both sides of the road, while providing a single traffic lane and emergency vehicle access.

Years of experience and a long history of providing services for the bereaved have given Forest Lawn the expertise to know what families need and the right way to provide the proper services and accommodations. The Forest Lawn–Hollywood Hills Master Plan is needed by the community and deserving of support.

Response to Comment No. 65-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 66

Rev. Vance Knutsen
1313 Valley View Rd., #101
Glendale, CA 91202

Comment No. 66-1

It has been my privilege, as an area pastor, to conduct many funeral services at Forest Lawn–Hollywood Hills over the years. I believe they are an asset to the area, both in terms of appearance and of service. It is my hope that they may be permitted to expand the usage of their property in order to meet the needs of our community in the years to come. They are a place of beauty and a credit to their surroundings.

Further, I believe the existing facility sets the standard for any additional development. It seems to me that in serving a very basic and continuing human need they have established a pattern of ongoing excellence which makes them a decided plus in our midst.

They have an obvious commitment to community and I believe that would carry forward in the proposed expansion.

Response to Comment No. 66-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 67

Leonard Lawrence
General Manager
Mount Sinai Memorial Parks and Mortuaries
Mount Sinai Hollywood Hills
5950 Forest Lawn Dr.
Los Angeles, CA  90068

Comment No. 67-1

The following is a representation of the issues that we at Mount Sinai Memorial Parks and Mortuaries believe have not been adequately considered or mitigated.

Response to Comment No. 67-1

The introductory comments are noted and have been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the environmental analysis in the Draft EIR are responded to below.

Comment No. 67-2

I. CREMATORY

“B-1 AIR QUALITY - c, pg 1-20” states “any proposed crematory would be required to implement Toxic Best Available Control Technology (T-BACT)........and be in compliance with SCAQMD Rule”.

The latest improvements on retorts completely eliminate any emissions of ashes, smoke and smell into the atmosphere, and, particularly as a Jewish cemetery, we expect full compliance to these conditions.

Response to Comment No. 67-2

As the comment notes, improvements in air pollution technology have made modern crematories much cleaner. As discussed on page IV.B-26 in Section IV.B.1, Air Quality, of the Draft EIR, any proposed crematory would be required to implement Toxic Best Available Control Technology (e.g., afterburner) as part of pre-construction permit review for compliance with SCAQMD Rule 1401 and the crematory would not be permitted to operate unless it demonstrated compliance with health-based performance standards that ensure the crematory would have a less-than-significant health risk based on SCAQMD’s significance thresholds.
Comment No. 67-3

Page 11-12, Table 11-2 lists the crematory as a structure containing 5,000 SF. This is a very large structure, particularly for a crematory. We have been unable to find a single plan in the EIR document that shows the proposed location of the crematory.

Response to Comment No. 67-3

As noted on page IV.B-26 of the Draft EIR, a crematory is proposed as a potential component of the Project, although operation of the crematory is only anticipated to occur, if at all, after completion of grading activities, which, as described in the Draft EIR, are expected to occur over an approximate 15-year period. Accordingly, a crematory has not yet been planned or designed, but as a practical matter, the crematory would be located close to the existing mortuary building, to allow for the discreet transfer of cases from the mortuary to the crematory. It is anticipated that the crematory, if developed, would be inconspicuously placed behind the existing mortuary building on the south side, where the crematory would likely be at the mortuary basement level, below the surrounding grade. Thus, the crematory is not expected to be visible from Forest Lawn Drive to the north or from the Church of the Hills within the Project Site to the south, and it would not be visible from Mount Sinai Memorial Park. If needed, supplemental planting would be provided to further screen the proposed crematory.

With respect to the size of the crematory, for reference, the existing crematory at Forest Lawn Memorial-Park–Glendale is approximately 2,500 square feet, including a witness area and office. The estimated square footage of the potential crematory on the Project Site is larger to allow for additional space, if needed, to accommodate alternate methods of preparing the deceased and/or future air quality or health department requirements which may be in place by the time the crematory is in operation.

Comment No. 67-4

II. BELL TOWER

“Assessments Of Improvements” on page 12 describes the 30 ft. x 30 ft. by 90 ft. tall bell tower, and indicates that the top of the bell tower would sit off to the side and would be “about 40 ft. lower than the viewpoint”. The distance from our southerly property line, Ramah Way, to the proposed tower is approximately 1,200 ft. The differential in elevations is 110 ft. (710 to 820, see Fig.5), including a 70 ft. setback for the tower, resulting in a line of sight at approximately 9% grade. The tower’s exposure to Mount Sinai would be over 80 ft. less the presently unknown height of the church structure.

On page 1-17, the bell tower is indicated to be 100 ft tall. On the same page, under the heading of “Private View Points”, there is no mention of the 90 ft. (or 100 ft.) bell tower.
III. Responses to Comments

(pg. 111-3) “Private views of the project are visible from the SE edge of Mount Sinai Memorial Park at its interface with a small section of the Project Site”.

Mount Sinai Memorial Park serves the “public” and the referred views are “public views”. Further, the “small sector of the Project Site” not only contains approx 30 acres but also the most prominent feature of the project – i.e. the Bell Tower” is located at the relatively highest elevation – i.e. 820 ft– 830 ft.

Nothing in the EIR document provides any indication of what the church, bell tower and wall crypts will look like from our vantage point, other than a photograph which shows the super imposed bell tower to be only twice as high as the adjoining wall crypts which are only 17-20 ft. in height. (Fig IV. A-22 and Fig IV A-25)

(Page 1-14 “While the feature would be taller than other proposed features it would require a small footprint and would generally be on the same scale and mass as other existing and proposed structures”

A 90 ft or 100 ft Bell Tower, located in proximity to the highest proposed development elevations (el: 820 ft ) is clearly of some significant scale.

Information on screen planting would be useful.

We must assume that there will be no church bells or crucifix on the tower or the church structure.

Response to Comment No. 67-4

As described in the Draft EIR, the bell tower referenced in the comment is a non-habitable structure that would rise to a height of up to 90 feet in the East Area of the Project Site. As noted on page IV.A-41 of the Draft EIR, although this feature would be taller than other proposed and existing structures, it would require a relatively small footprint and would generally be on the same scale and mass as other existing and proposed structures. Although the Draft EIR describes this feature as a “bell tower,” it will not have a bell or chimes. This clarification has been incorporated into the Final EIR, as well as clarification that the proposed height of the tower feature is up to 90 feet rather than 100 feet. Refer to Subsection II.A, General Corrections and Additions to the Draft EIR, of Section II, Corrections and Additions of this Final EIR. As an architectural feature, the height indicated in the Draft EIR is necessary for the tower feature to be at proper scale with the vistas in the cemetery and with the large garden plateau immediately south of the tower feature. As depicted in Figure IV.A-25 on page IV.A-39 of the Draft EIR, which presents a conceptual design view of the East Area from Mount Sinai Memorial Park, the location of the tower feature is setback from the top of the slope and behind the proposed church.
structure, with planting along the surrounding slope. Thus, only a portion of the tower feature would be visible from Mount Sinai Memorial Park. The conceptual design view also depicts the anticipated “open” nature of the tower feature (i.e., it is not expected to be an enclosed structure), which further reduces the tower feature’s mass and view obstruction. The proposed church structure is also anticipated to have an open design. Further, as the comment notes, the Project does not propose a prominent crucifix on the tower or church structure that would be visible from Mount Sinai Memorial Park.

**Comment No. 67-5**

II. **HAUL ROADS**

“5. HAUL ROUTE” in page 11-19 states “the Project includes a request for two haul route permits......” No place in the EIR document can we find any indication of the locations of the proposed haul routes. As such we can make no assessment of the impact of massive numbers of trucks exporting huge amounts of material over a yet to be discussed and unknown haul route.

“(1) Project General Noise” on page 1V-1-22 states” the haul route would not include the use of the westernmost entrance to the Project Site along Forest Lawn Drive.”

“2. Intermine Projects” on page 11-9 mentions the previously approved existing haul route, along the easterly property line of Mount Sinai Memorial Park. There is no indication that there is intent to seek further approval to continue the use of said haul road.

The project involves the export of over 700,000 cubic yards of export material, over a 15 year period, representing a continuous export of substantial material on a weekly/daily basis for 15 years. Yet, there is no information on how this is going to be accomplished or the route involved and possible impacts and mitigations on Mount Sinai.

Upon determination of the deposit sites the issues that relate to traffic congestion on Forest Lawn Drive as it relates to the export truck traffic leaving Forest Lawn Park onto Forest Lawn Drive must be given serious consideration and mitigation.

There is no mention in the EIR of any other traffic issues that may arise from Forest Lawn’s expansion of its facility, the addition of another church and substantial increase in burial spaces.

**Response to Comment No. 67-5**

The anticipated Project haul route is described on Page IV.J-9 in Section IV.J, Traffic, Circulation, and Parking, of the Draft EIR. It is anticipated that all haul trucks going
to or from the Project Site would use the SR-134 Freeway via the on- and off-ramps for Forest Lawn Drive. The haul trucks leaving the Project Site would travel east on Forest Lawn Drive, through the intersection with Zoo Drive and onto the SR-134 Freeway east or west, depending on the location of the receptor sites for the exported soil, which have not yet been identified. Haul trucks returning to the Project Site would be expected to travel the same route, except in the reverse direction. As currently planned, construction haul trucks would access the site almost entirely during the late evening to early morning hours period.

Further, as noted on Page IV.J-9 of the Draft EIR, LADOT requires implementation of worksite traffic control plans to ensure that construction-related effects are minimized. In addition, all Project construction activities would be performed in accordance with all applicable laws, codes and practices, including the Department of Building and Safety's "Good Neighbor Construction Practices" to minimize construction-related impacts on the surrounding community. As the Draft EIR explains, these practices include parking construction vehicles on-site to prevent congestion, using flag persons and warning signs during haul truck entry/exit from the construction site, avoiding street closures during peak traffic hours, properly filling concrete trucks during deliveries, eliminating unnecessary noise (e.g., music) during construction, cleaning construction debris from public rights-of-way, eliminating conflicts with City trash pick-up schedules/operations, and obtaining permits when storing building materials in the public right-of-way. (See page IV.J-9 of the Draft EIR.) Further, Project-related hauling of excavated soil from the Project Site is anticipated to occur primarily during the late evening to early morning period, and would generally not occur during the A.M. or P.M. peak hour periods. These limitations have been added as Project Design Features to clarify the Applicant's intent to abide by such limitations. Please refer to Section II, Corrections and Additions, of this Final EIR.

These practices will further minimize construction-related traffic impacts on the surrounding community and roadways.

As the comment notes, although Forest Lawn has previously obtained approval to use the easternmost access road on the Project Site near Mount Sinai Memorial Park in connection with a prior haul route permit, the easternmost access road is not anticipated to be used for significant hauling activity in connection with the proposed Project. The comment correctly notes that the Draft EIR states that the Project's haul route would not include the use of the westernmost entrance to the Project Site along Forest Lawn Drive.

Other potential traffic issues are also addressed in Section IV.J, Traffic, Circulation, and Parking, of the Draft EIR. As explained in the Draft EIR, based on the stability in the number of interments that have occurred at the Forest Lawn Memorial-Park–Hollywood Hills property over the last decade, trip generation is expected to continue to be stable over the life of the Project. No additional growth in trip generation beyond current levels is
III. Responses to Comments

anticipated. Accordingly, the Draft EIR concluded that no increase in trip generation, including with the Project, is anticipated. As the Draft EIR explains, the daily average number of interments at the Project Site has remained approximately the same for the past 13 years. The number of visitors to cemeteries is directly correlated to the amount and rate of annual interments. The death rate in Los Angeles County has also remained relatively unchanged for many years. However, even if the death rate in Los Angeles County were to increase, the daily and/or monthly amount of interments at the Project Site would not increase due to existing logistical constraints at the facility. (See page IV.J-10 of the Draft EIR.) As the Draft EIR further explains, available traffic count data indicates that the daily traffic volume on Forest Lawn Drive remained stable for the 7.5-year period ending in April 2007. Therefore, although the Project will provide approximately 200,000 additional interment sites, the level of daily interment activity is expected to continue to be stable over the life of the Project, as it has been for over the last 13 years. Furthermore, the new interment sites will be developed and utilized within the undeveloped areas of the Project Site over an extended period of time, from 2011 to 2050 and beyond, in order to meet the regional demand for new interment sites as the existing supply of interment space is depleted.

In order to provide a conservative analysis, the Draft EIR assumed a hypothetical growth rate of one percent over each five-year period. Thus, assuming this hypothetical growth, toward the build-out of the Project, the Project would generate an additional 239 trips per day, including 9 A.M. and 21 P.M. peak-hour trips. (See page IV.J-11 of the Draft EIR.) Most interments do not occur during the morning or evening traffic peak periods. Based on the City of Los Angeles CEQA Thresholds Guide, if a project generates less than 500 daily trips and less than 43 trips in the P.M. peak hour, there would be no significant impacts on the street segment. The trip generation estimates for the Project are minor and well below the City's criteria for triggering project traffic studies. The trip generation estimates for the Project would not result in significant traffic impacts on a weekday or weekend day. Further, as the Draft EIR notes on page IV.J-12, the Project Site’s weekday peak trip generation generally occurs between the off-peak traffic hours of 10:00 A.M. and 3:00 P.M., and does not impact traffic during the typical commute hours when traffic volumes are greater. This pattern is expected to continue with the Project.

Comment No. 67-6

III. NOISE IMPACTS

“(5) Construction Blasting” on page 1-77 states “It is anticipated that there would be one controlled blasting event per day for approximately 50 days during the proposed construction.”

There are also other noise impacts during construction with the “use of heavy equipment for demolition, grading, excavation, rock crushing, and yes, also blasting”. (pg 1-72)
On page 1-78 it is stated that “Noise impacts are localized in nature and decrease substantially with distance”. Some data is provided, such as “Table IV.1-12” on page IV. 1-24 showing DBA levels at Mount Sinai Memorial Park that are clearly disproportionate to the other shown DBA levels.

“Table IV.I-14” on page IV-1-27 shows lower levels of “Construction Vibration Levels” at Mount Sinai as opposed to the “Single Family Residence” west of the project site!

“Air Blast Levels Due to Blasting” on page IV-1-31 shows 113-123 dB as well as the “Significant Threshold” of 129 dB for “Building Damage” with no mitigating factors.

(pg IV-J-9) “Construction related impacts to the surrounding land would be less than significant.”

“6. Level of Significance After Mitigation” on page IV.I-34 states “operation of the Project would not result in any significant impact associated with noise or vibration. No mitigation measures will be required”.

Close to 2 million cubic yards of cut, over 1 million cubic yards of fill and export of over 700,000 cubic yards over a 15 year construction period, does generate impacts on Mount Sinai Memorial Park and DOES require mitigation measures that are currently absent from the EIR document.

**Response to Comment No. 67-6**

The analysis undertaken in Section IV.I, Noise, of the Draft EIR accounts for noise and vibration impacts associated with blasting, as well as use of various types of heavy equipment during construction. Construction-related noise levels at Mount Sinai Memorial Park would not be considered significant pursuant to the City’s CEQA Thresholds Guide but were included in the Draft EIR for informational purposes. Accordingly, on page IV.I-23 of the Draft EIR, the analysis includes a discussion of Project-related construction noise levels at Mount Sinai Memorial Park. (See Table IV.I-12, page IV.I-24 of the Draft EIR.)

Employing a conservative estimate of maximum reference noise levels, the analysis concludes that construction noise associated with the Project would increase noise levels at Mount Sinai Memorial Park by up to 5.5 dBA when construction is occurring at the nearest possible location to this receptor.

The Draft EIR also includes an analysis of potential project-related vibration and airblast impacts at Mount Sinai Memorial Park. Table IV.I-14 on page IV.I-27 of the Draft EIR provides the estimated ground-borne vibration impacts associated with construction equipment. As indicated therein, estimated construction vibration levels at Mount Sinai Memorial Park would be approximately 42.7 VdB, well below the Federal Transit
III. Responses to Comments

Administration’s human annoyance threshold of 75 VdB. As shown in Table IV.I-15 on page IV.I-31 of the Draft EIR, airblast levels at Mount Sinai Memorial Park associated with Project-related blasting activities would also be below the relevant threshold and less than significant. Specifically, the airblast levels at Mount Sinai Memorial Park would range from 106 to 123 dB, and would be below the Office of Surface Mining Reclamation and Enforcement building damage threshold of 129 dB. In addition, as shown in Table IV.I-16 on page IV.I-33 of the Draft EIR, ground-borne vibration levels at Mount Sinai Memorial Park associated with blasting activities within the Project Site would also be below the relevant threshold and less than significant. Specifically, the ground-borne vibration levels would range from 0.067 to 0.189 PPV and would be well below the Caltrans building damage threshold of 0.50 PPV. With respect to the number of controlled blasting events, as noted in the Draft EIR, it is anticipated that there would be one controlled blasting event per day for approximately 50 days during proposed construction. To clarify, there is expected to be a maximum total of 50 controlled blasting events over the course of the Project’s approximate 15-year grading period. The Project does not propose 50 consecutive days of controlled blasting; rather, controlled blasting events would occur intermittently throughout the 15-year grading period as non-rippable rock is encountered during the excavation process. Please refer to Section II, Corrections and Additions of this Final EIR.

The construction related noise levels provided in Table IV.I-12 of the Draft EIR were calculated based on the distance between the construction areas and the affected receptors. As indicated in Table IV.I-12, West Area construction activities would be closer to the single-family residential uses than to Mount Sinai Memorial Park. Thus, construction-related noise levels from West Area construction activities would be greater at the single-family residential uses than at Mount Sinai Memorial Park.

Similarly, ground-borne vibration generated by construction equipment would vary based on the distance between the construction equipment and the affected receptors. As indicated in Table IV.I-14 of the Draft EIR, the estimated ground-borne vibration levels at Mount Sinai Memorial Park are lower than that of the single-family residential uses, as the single-family residential uses are closer to the nearest Project construction activities (i.e., approximately 400 feet from construction activity areas when construction activities occur in the West Area). By comparison, Mount Sinai Memorial Park is approximately 750 feet from the construction activity areas on the Project Site that are closest to Mount Sinai Memorial Park.

As noted on page IV.I-32 of the Draft EIR, operation the Project would not change the various types of activities that currently occur within the Project Site, nor would it generate a substantial increase in daily trips. Therefore, operation of the project would not result in significant impacts at receptors in the vicinity of the Project Site, including Mount Sinai Memorial Park.
Potential impacts associated with grading and export have been thoroughly evaluated in the Draft EIR. As indicated in the impact analyses provided in the Draft EIR, including within Section IV.I, Noise, potential impacts associated with grading and export would be less than significant.

**Comment No. 67-7**

Mount Sinai Memorial Park shares over 6,000 lin. ft. of common boundary with Forest Lawn. We have both, over a 47-year period, been good neighbors sharing considerations of our mutual needs. We fail to understand why the Applicant did not encourage the numerous consultants, who were engaged during the past 5 years in the preparation of this EIR document, to have direct contact with us in their attempts to mitigate our concerns.

**Response to Comment No. 67-7**

As noted in the Draft EIR on page I-2, comments from identified interested parties on the Draft EIR were solicited through a Notice of Preparation (NOP) process. The NOP for the Draft EIR was circulated for a minimum 30-day review period starting on November 13, 2008 and ending on December 15, 2008. In addition, a public scoping meeting was held on November 19, 2008. The public scoping meeting provided the public with the opportunity to receive information regarding the Project and to provide input regarding issues to be addressed in the Draft EIR. A copy of the NOP was attached as Appendix A to the Draft EIR. The Commentor was included in the distribution of the NOP, and representatives of the Commentor attended the public scoping meeting for the Project. In addition, the Applicant has met privately with the Commentor to discuss the Project on multiple occasions and considered issues known to be important to the Commentor in designing the proposed Project.

**Comment No. 67-8**

What we find truly amazing is that a project of this huge scope, generating an EIR document of over 4,000 pages, does not include any mitigation of the issues as detailed in this letter.

**Response to Comment No. 67-8**

The Draft EIR has been prepared in accordance with all applicable CEQA requirements. Potential impacts are based on the significance thresholds and methodologies set forth within the City of Los Angeles CEQA Thresholds Guide. Each section in Chapter IV of the Draft EIR fully discloses and analyzes the potential environmental impacts associated with the proposed Project, including potential impacts related to air quality, noise, aesthetics, and traffic referenced by the Commentor. Sections IV.B.1, Air Quality, and IV.J, Traffic, of the Draft EIR conclude that potential impacts associated with the proposed Project would be less than significant and mitigation
measures are not required. As explained in Section IV.A, Aesthetics, of the Draft EIR, although impacts related to aesthetics are anticipated to be less than significant, mitigation measures are included to further reduce the proposed Project’s less-than-significant impacts. (See Mitigation Measures A-1 through A-3, Draft EIR pages IV.A-44 and IV.A-45.) Additionally, Section IV.I, Noise, of the Draft EIR, includes mitigation measures to reduce the proposed Project’s construction-related noise impacts to a less-than-significant level. (See Mitigation Measures I-1-4, Draft EIR page IV.I-34.) The Commentor’s specific concerns regarding potential impacts are addressed in detail in Responses 67-2 through 67-7 above, and as noted in Response to Comment Nos. 67-4 through 67-7, additional Project Design Features and clarifications have been incorporated into the Final EIR to further clarify specific issues raised by the Commentor.

**Comment No. 67-9**

Mount Sinai reserves the right to provide further comments and, if warranted, objections if, as and when additional information is provided or surfaces in response to these comments, comments by others or in any other manner.

Written responses should be directed to the writer at 5950 Forest Lawn Drive, Los Angeles 90068 with copies to Mr. Robert Levonian at the same address. Email inquiries should be directed to llawrence@mountsinaiparks.org with copies to rlevonian@lcb-inc.net.

All telephone inquiries for more information should be directed to Mr. Robert Levonian at 818-242-4109 or 818-216-1174.

**Response to Comment No. 67-9**

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment Letter No. 68

Elinor Lloyd  
P.O. Box 4401  
Glendale, CA 91222

Comment No. 68-1
As detailed in the Draft EIR on Forest Lawn, cemetery interment sites are becoming increasingly scarce, and the supply of available spaces within 15 miles of Forest Lawn will be nearly gone by 2018. At Forest Lawn–Hollywood Hills, interment sites will be exhausted by 2016.

This is particularly troublesome since communities of religious faith within the area served by Forest Lawn overwhelming prefer burial over cremation. Forest Lawn’s plan to add thousands of new interment sites over the next decades is vitally important. The new facilities planned by Forest Lawn show an understanding of the many religious and cultural beliefs and preferences of our very diverse community and that Forest Lawn is striving to make the preferred resources available.

Forest Lawn has enough undeveloped land available within their existing 444-acres to create new facilities for families who will need their services in the years to come. They provide an essential, caring service and their plans should be approved.

Response to Comment No. 68-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 69

Edwin P. Mah  
Chinese Consolidated Benevolent Association  
925 N. Broadway  
Los Angeles, CA  90012

Comment No. 69-1

I write in support of Forest Lawn’s proposed plans to add additional burial space and related facilities at their Memorial Park in the Hollywood Hills.

The recently released Draft Environmental Impact Report on the project reveals that Forest Lawn shows a significant depth of sympathy and respect for a variety of religious beliefs and customs. Their plans to add new in-ground burial space, mausoleums and crypts will meet the needs of many cultures and families and I have no doubt that the new facilities will be just as beautiful and well maintained as the existing facilities.

Forest Lawn provides important and much needed services that will soon be in very short supply. Additionally, the Memorial Park is host to countless cultural and educational events that benefit the surrounding community. Forest Lawn has proposed a thoughtful and sensitive plan for the future that deserves the support of decision-makers.

Response to Comment No. 69-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 70

Larry R. Maib  
Senior Pastor  
First Baptist Church of Canoga Park  
20553 Sherman Way  
Canoga Park, CA  91306

Comment No. 70-1

I am writing regarding the expansion program at Forest Lawn, Hollywood Hills. I am writing to lend my support to this project.

I have been conducting funerals at Hollywood Hills for over 25 years. I have always been impressed with the high quality of service at Forest Lawn, and how they strive to serve the community, not just as a cemetery, but as a cultural center for school children, civic groups and patriotic programs.

There are a number of important people of Los Angeles who have been buried or interred there, including both government people and Hollywood stars. Forest Lawn serves Los Angeles!

As a local pastor, and one who works with Forest Lawn on a regular basis, I am in favor of the proposal plan so that Forest Lawn may continue to be a servant to the people of Los Angeles for years to come.

Thank you for taking time to consider my letter of support.

Response to Comment No. 70-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 71

Lisa Marxer  
19702 Nicholas Ave.  
Cerritos, CA  90703

Comment No. 71-1  
Forest Lawn–Hollywood Hills is meticulously landscaped and groomed. According to the project’s Draft EIR, new areas to be developed on Forest Lawn’s property will look much like the existing memorial park grounds, with extensive landscaping, ground cover and garden areas.

Further, Forest Lawn is known for its distinctive architecture, artwork, stained glass and statuary, all of which will be important components of the new cemetery development. It is comforting to know that well into the future, Forest Lawn will remain a place of beauty and tranquility. I applaud Forest Lawn’s plans for their Hollywood Hills memorial park and hope their applications are approved.

Response to Comment No. 71-1  
The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 72

Rev. Robert T. McDill
20200 Gilmore St.
Winnetka, CA 91306-4212

Comment No. 72-1

I have lived in the Valley for over 50 years, attending our public schools and serving the following Churches:

- Panorama Presbyterian Church, Panorama City: Youth Minister
- Encino First Presbyterian Church, Encino: Pastor
- Metropolitan Community Church, North Hollywood: Minister
- Sepulveda Unitarian Universalist Society, North Hills: Minister

Over the years of my service to the Communities here in the Valley, I have used the services of the Hollywood Forest Lawn Mortuary. I have always been impressed with their professionalism. More important their “ministry” to families in our communities has been exemplary.

I do not hesitate to support their plan to expand their “ministry” by developing further adjacent land to their property. I have always been impressed with the beauty of their grounds (unlike the surrounding hills that often are not as beautiful, due to the dryness and heat of the Valley).

I fully support their expansion and do not hesitate to make this recommendation.

Response to Comment No. 72-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 73

Mary McKain  
Elk’s #99 Concert Band  
P.O. Box 5884  
Glendale, CA  91201

Comment No. 73-1

I’m writing regarding Forest Lawn’s plans for the undeveloped property at their Hollywood Hills Memorial Park.

Traffic is typically a concern related to any development project. However the traffic analyses detailed in the Forest Lawn Draft EIR shows that despite the addition of new interment sites and related facilities, traffic to and from Forest Lawn will continue at approximately the same level as currently exists. The new development at Forest Lawn will extend the life of the Memorial Park’s operations but will not increase the number of funerals or events that are presently scheduled.

Forest Lawn provides an essential community service and operates with the highest standards. Ensuring the continued provision of service is something that the community needs and desires.

Response to Comment No. 73-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 74

Myka Miller
Executive Director
Harmony Project
817 Vine St., Ste. 212
Los Angeles, CA  90038
www.harmony-project.org

Comment No. 74-1

The Harmony Project is a program that targets at-risk youth in underserved areas of Los Angeles through music. We promote positive youth development through tuition free year-round music lessons and ensemble participation, focusing on community. Our mission is to build healthier communities through music.

We have been fortunate to use Forest Lawn’s Hall of Liberty for numerous free concerts various times a year open to the public. We usually fill the hall with hundreds of Angelenos, families, students, and friends. This year we are entering into our 10th year, and Forest Lawn has been an integral part in providing a performance venue.

Forest Lawn Hollywood Hills has a decades-long tradition of providing facilities and programs for schools, religious institutions and community organizations at the memorial park. As an organization that has benefited from its open-door policy to community groups, I was pleased to learn that the commitment to continuing that tradition is one of the key objectives of the project as detailed in the Draft EIR.

The new project will enhance Forest Lawn’s ability to continue the tradition, with new facilities and expanded space. Forest Lawn recognizes that it plays an important role in many aspects of community life – a role that is appreciated by its neighbors and organizations like ours.

I support this project and would hope that it may move through the public approval process in a timely manner.

Response to Comment No. 74-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 75

Tom Nare
Village Christian Schools
8930 Village Ave.
Sun Valley, CA  91352
www.villagechristian.org

Comment No. 75-1

When I drive past Forest Lawn I’m always impressed by the expanse of greenery and beautiful landscaping in the midst of the City. I was pleased to learn in the Environmental Impact study that the proposed new facilities will be designed to be compatible with the existing park. It’s important to me that the high standards, which we’ve come to expect from Forest Lawn will be maintained in the execution of their Master Plan.

A lot of people may not be aware of all of the wonderful programs that would not happen if it weren’t for the generosity of Forest Lawn. They have provided us the venue for our graduation exercises for 18 straight years. They also provide the venue for several other graduation ceremonies and concerts from various local schools and organizations. Approval of this project will ensure that Forest Lawn will continue to be a valued member of the community.

In closing I would hope that decision-makers consider the impact on the community if Forest Lawn were to run out of internment sites as is projected within the next several years. If that were to happen, families in our community will lose a treasured resource and could be forced to seek burial options further from their homes.

This project is deserving of support from everyone in the community.

Response to Comment No. 75-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 76

Dale J. Goldsmith
Armbruster Goldsmith & Delvac LLP
11611 San Vicente Blvd., Ste. 900
Los Angeles, CA  90049

Comment No. 76-1

We are writing on behalf of our client NBC Universal ("NBCU") regarding the Draft Environmental impact Report ("DEIR") for the Forest Lawn Memorial Park – Hollywood Hills Master Plan (the “Project”). As a preliminary matter, we wish to stress that NBCU is not opposed to Forest Lawn’s project, but wants to make sure that the construction and operation of the Project does not adversely affect NBCU’s operations at NBCU Studios in Burbank and Universal Studios in Universal City.

We have recently met with Forest Lawn representatives and had a productive discussion. We are hopeful that NBCU and Forest Lawn will continue their dialogue and reach a cooperative agreement to address NBCU’s concerns. Nonetheless, as the public comment period on the DEIR closes today, we are writing to provide NBCU’s preliminary questions and comments on the DEIR. We hope that our continued dialogue with Forest Lawn will address all of the following issue, in which case some or all of the measures and analysis below may be unnecessary. However, we reserve the right to request additional analysis and mitigation measures if the parties are unable to reach a cooperative agreement.

Response to Comment No. 76-1

The introductory comments are noted and have been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the environmental analysis in the Draft EIR are responded to below.

Comment No. 76-2

1. Blasting. The Project proposes to use blasting to break up non-rippable rock. The blasting will occur one time per day for 50 days during the proposed 15-year grading period. According to DEIR Page IV.1-20, the threshold of significance with respect to noise from blasting activities is 120 dB for human annoyance and 129 dB for building damage. The significance threshold for vibration from blasting is .25 inch/second peak particle velocity (PPV) for human annoyance and .50 inch/second PPV for building damage. It appears that the first set of thresholds pertains to airblast effects and refers to Linear” or “Flat” decibels (dBL) (see below). It appears that the second set of thresholds pertains to groundborne vibration induced by blasting. Please confirm.
III. Responses to Comments

DEIR Table IV.1-15 shows that airblast levels at receptor location 4 (located between 1625 and 5875 feet from the various blasting locations and near NBCU’s Burbank Studios) would range from 96 dB to 119 dB. The DEIR concludes that these levels would be less than significant based on the above-reference thresholds. NBCU is concerned that a significance threshold based on human annoyance may not be appropriate for determining impacts to the wide range of vibration-sensitive equipment used by NBCU in connection with film and television production activities, such as sound editing and live television broadcasting. Additional analysis should be performed to determine potential airblast impacts to NBCU’s film and television production activities at both the Universal Studios and Burbank locations using the appropriate threshold for vibration sensitive equipment.

Alternatively, Forest Lawn should conduct a test blast at a time agreed to by NBCU and allow NBCU to monitor the effects of the blast on NBCU’s equipment and determine whether the airblast affects such equipment. If the equipment is adversely affected, Forest Lawn should undertake additional measures to reduce such impact.

The Office of Surface Mining (OSM) Reclamation and Enforcement Blasting Guidance Manual, January 28, 1987 (the “Blasting Manual”) states that airblast effects may be increase due to unfavorable atmospheric conditions, such as temperature inversions, strong winds, or overcast days with a low ceiling. It is unclear whether the analysis in the DEIR assumed these unfavorable conditions. If not, additional analysis should be provided assuming such unfavorable conditions, or a mitigation measure or project design feature (PDF) added restricting blasting during such unfavorable conditions.

The blasting analysis assumes the maximum charge weight for all the receptor locations (other than receptor location 2 in Phase 2) will be limited to 165 lbs. Please confirm that this charge weight represents the total cumulative weight for each blast. The DEIR should include a mitigation measure or PDF requiring that such cumulative per blast charge weights will not exceed 165 lbs.

The Blasting Manual indicates that the blasting noise significance thresholds in the DEIR actually relate to air overpressure energy from airblast. Such overpressure is measured in “Linear” or “Flat” decibels (dBL), whereas sound is measured in “A” weighted decibels (dBA). Depending on the frequency of the sound, distance to the blasting and intervening noise barriers, the blasting noise may range from inaudible to very loud. Audible sound could potentially interfere with production activities at the Universal Studio location or the NBCU television facilities in Burbank. The DEIR should include an analysis of these potential blasting sound impacts on NBCU’s noise sensitive equipment, in addition to the overpressure analysis described above.

To reduce potential impacts on NBCU’s production activities and operations, Forest Lawn should be required to provide NBCU with as much advance notice of blasting as is feasible,
but no less than five business days. The notice should specify a one hour time window around which NBCU can schedule its sensitive production activities.

Response to Comment No. 76-2

As explained on page IV.I-6 of the Draft EIR, the studies and criteria described in the Draft EIR noise analysis are used for analytic purposes to formulate methodologies and significance thresholds for noise and vibration associated with controlled blasting and vibration that are not currently provided by the Los Angeles CEQA Thresholds Guide. Therefore, significance thresholds for noise and vibration impacts due to blasting activities were established for the analysis in the Draft EIR based on review of the noise standards and guidelines from the USBM, OSM, and Caltrans. As explained on page IV.I-20 of the Draft EIR, to provide a conservative approach, the significance thresholds used in the Draft EIR are based on the lower limits from USBM, OSM, and/or Caltrans. The analysis uses a decibel linear peak (dB) threshold for airblast levels and a peak particle velocity (PPV) threshold for ground-borne vibration levels. Additional information regarding these noise and vibration descriptors related to blasting is provided on page IV.I-5 of the Draft EIR.

As indicated on page IV.I-29 of Section IV.I, Noise of the Draft EIR, impacts associated with construction-related blasting activities were calculated based on guidelines and engineering procedures provided by Caltrans. The Caltrans procedures utilize the cube-root scaled distance method, which is similar to that set forth in the OSM Blasting Manual and used by the Bureau of Mines. As explained on page IV.A-5 of the Draft EIR, an air blast, also referred to as air overpressure, is a sudden rise in standard air pressure and generally refers to the type of noise levels produced by a blasting action. The intensity of the air overpressure is based primarily on the amount of explosive materials used (commonly referred to as charge weight) and the below grade distance at which charges are detonated. As the Draft EIR further explains, and as indicated in the Caltrans procedures, there are other variables that would affect the prediction of air-overpressure from blasting, including atmospheric conditions. There are no known established calculation procedures with respect to the affect of atmospheric conditions that are applied to airblasts. Therefore, the Project analysis utilized the highest anticipated charge weights that would be used, as well as the upper bound multiplier value (K factor) to present the highest airblast levels. Based on specific data from prior blasting activities conducted by the Applicant, charge weights of 3.5 pounds to 165 pounds per delay have previously been used. The amount of charge weight ultimately used generally depends on the rock characteristics and varies from site to site; however, to provide a conservative analysis, a charge weight of 165 pounds per delay was used for the noise and vibration analysis associated with controlled blasting activities, with the exception of blasting within the East Area. Further, as explained in note b in Table IV.I-15 on page IV.I-31 of the Draft EIR, the estimated airblast levels were calculated using the upper and lower bounds K factor to provide a range of anticipated levels. By utilizing the highest K-factor, the Project
estimated air overpressure (airblast) noise and vibration levels are representative of the unfavorable conditions leading to higher levels of noise and vibration.

As indicated in the OSM Blasting Manual, much of the energy associated with airblast is of low frequencies.\(^{32}\) Airblast levels generated from a confined blast, such as those that will occur at the Project Site, consist mostly of acoustic energy below 20 Hz, which is generally below the normal human hearing frequency range.\(^{33}\) For this reason, airblast levels are described in terms of linear peak (dB), as opposed to the A-weighted sound pressure level (dBA), which is most applicable to human hearing sensations. In a study performed by USBM, blast-induced noise was measured at a common location using sound level meters with A-Weighted, C-Weighted, and Linear settings. The comparable measurements from a blast show that a linear peak noise of 120 dBL equates to only 112 dBC and 85 dBA.\(^ {34}\) Furthermore, most audio recording equipment (e.g., microphone and recorders), such as those used in film and television productions, typically have response frequencies between 20 Hz and 20 kHz, which are within the typical human hearing range. The airblast-induced noise (air overpressure) occurs at the frequencies below the threshold of hearing for humans at 5 to 20 Hz. Hence, airblast impacts on the NBCU’s audio recording equipment would not be expected.

As discussed above and noted on page IV.I-29 of the Draft EIR, the charge weights used in the blasting analysis were based on a maximum charge weight of 165 pounds per delay, with the exception of controlled blasting at the East Area, where a maximum charge weight of 65 pounds per delay was used. The maximum charge weight per delay represents the maximum amount of charge that would be used for the individual blast hole, not the cumulative weight per blast event. A typical blast would include multiple blast holes, which would be detonated in sequential order. The maximum airblast and ground vibration levels are based on the individual charges per delay in accordance with Caltrans procedures.

As discussed above, blasting activities associated with the Project would not result in significant airblast or vibration impacts at NBCU. Nonetheless, the Applicant has indicated that they will continue to coordinate with NBCU regarding proposed blasting activities and will provide a minimum five-day notice to NBCU prior to proposed blasting activities with a specified time range for the blasting event(s), as well as coordination for


\(^{34}\) Blasting Impacts Assessment for Proposed Idaho-Maryland Mine in Grass Valley, CA.
monitoring the NBCU site during initial blasting activities. The initial blasting activity will serve as a test blast and provide NBCU an opportunity to monitor the effects of the blasting activities, if any, at NBCU’s property.

As noted above, in the analysis undertaken in the Draft EIR, the predicted airblast levels are already representative of unfavorable atmospheric conditions. Despite the use of these conservative noise and vibration assumptions, potential impacts associated with blasting activities would be less than significant. As such, a restriction regarding blasting during unfavorable atmospheric conditions is not necessary. Use of a maximum charge weight of 165 pounds per delay has been incorporated as a project design feature. Please refer to Subsection IV.I, Noise, of Section II, Corrections and Additions, of this Final EIR.

Comment No. 76-3

2. Hauling Activities. The Project will involve the export of 713,000 cubic yards (cy) of soil during construction. At an average of 14 cy per truck, this amount of export would require almost 51,000 total haul trips, or more with smaller trucks. While the grading will occur over a number of years, the DEIR states that dirt will be stockpiled on site for an unspecified time period. Thus, the potential exists for intermittently heavy hauling activity as stockpiles are reduced.

We understand that Forest Lawn intends to conduct such hauling at night to reduce impacts. NBCU supports this approach. A mitigation measure or PDF should be added limiting hauling to the nighttime period.

Response to Comment No. 76-3

As explained in the Draft EIR, the export of soil during the Project would be dependent upon market conditions and construction sites looking for suitable soil for fill material that become available. (See page II-16 in the Project Description of the Draft EIR.) Project-related hauling of excavated soil from the Project Site is anticipated to occur primarily during the late evening to early morning period, and would generally not occur during the A.M. or P.M. peak hour periods. These limitations have been added as Project Design Features to clarify the Applicant’s intent to abide by such limitations. Please refer to Section II, Corrections and Additions, of this Final EIR.

Comment No. 76-4

The construction air quality analysis assumes that daily hauling would be limited to between 70 (Phase I) to 300 (Phase 3) haul and delivery trips per day. The Final EIR should include a mitigation measure or PDF to assure that these daily trip numbers (and daily emission levels) are not exceeded.
Response to Comment No. 76-4

As explained in Section IV.B.1, Air Quality, of the Draft EIR, for a conservative analysis, all of the construction equipment used in the analysis is assumed to be diesel-powered. As the Draft EIR explains, construction-related emission will vary day-to-day depending on the specific construction activities occurring. Reasonable assumptions regarding construction activities were made to provide a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences per CEQA Guidelines Section 15151. The comment is noted and has been incorporated in the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 76-5

The Project will also require the export of an additional 400,000 cy of soil for interments. This interment-related export has the potential to result in a total of over 28,000 haul truck trips, or more with smaller trucks. Please clarify whether the soil will be stockpiled or removed on a regular basis. If the soil will be accumulated in a large stockpile, reasonable daily limits on the number of such haul trucks should be established, or such hauling should be limited to the nighttime period.

Page IV.J-9 of the DEIR states that “it is anticipated” that haul trucks would use the SR 134 Freeway and access the project site via Forest Lawn. A mitigation measure or PDF should be added that requires all haul and delivery trucks be limited to this route. This should apply to both construction and interment-related hauling.

Response to Comment No. 76-5

As explained in the Draft EIR, up to 400,000 cubic yards of dirt will be exported in connection with grave preparation through 2050. (See page II-11 of the Project Description of the Draft EIR.) This dirt will be generated incrementally over the life of the Project as grave sites are prepared for interment. As with the soil generated during the grading associated with the Project, the export of soil during the Project would be dependent upon market conditions and construction sites looking for suitable soil for fill material that become available. (See page II-16 in the Project Description of the Draft EIR.) As explained in Response to Comment No. 76-3, Project-related hauling of excavated soil from the Project Site is anticipated to occur primarily during the late evening to early morning period, and would generally not occur during the A.M. or P.M. peak hour periods. These limitations have been added as Project Design Features to clarify the Applicant’s intent to abide by such limitations. Please refer to Subsection IV.J, Traffic and Circulation, of Section II, Corrections and Additions, of this Final EIR.
III. Responses to Comments

With respect to the haul route, as stated on page II-21 of the Draft EIR, while the sites receiving the removed soils have not been identified at this time, the haul routes that would be used during construction and operation of the Project would access the Project Site from Forest Lawn Drive and would access the SR-134 Freeway directly from Forest Lawn Drive. This limitation has been added as a Project Design Feature. Please refer to Section II, Corrections and Additions, subsection IV.J, Traffic, Circulation and Parking, of this Final EIR.

Comment No. 76-6

3. Construction Management. Forest Lawn should prepare a detailed construction management plan for the entire term of construction of the Project that includes, but is not limited to:

i. Prohibiting on street parking, staging or idling of construction vehicles on Forest Lawn Drive;

ii. Providing NBCU with Direct 24-hour access to Forest Lawn construction management personnel; and

iii. Providing NBCU with quarterly schedule of planned construction activities.

Thank you for the opportunity to provide the foregoing comments.

Response to Comment No. 76-6

As explained on Page IV.J-9 of the Draft EIR, LADOT requires implementation of worksite traffic control plans to ensure that construction-related effects are minimized. In addition, all Project construction activities would be performed in accordance with all applicable laws, codes and practices, including the Department of Building and Safety's "Good Neighbor Construction Practices" to minimize construction-related impacts on the surrounding community. As the Draft EIR explains, these practices include parking construction vehicles on-site to prevent congestion, using flag persons and warning signs during haul truck entry/exit from the construction site, avoiding street closures during peak traffic hours, properly filling concrete trucks during deliveries, eliminating unnecessary noise (e.g., music) during construction, cleaning construction debris from public rights-of-way, eliminating conflicts with City trash pick-up schedules/operations, and obtaining permits when storing building materials in the public right-of-way. (See page IV.J-9 of the Draft EIR.) The Applicant does not intend to use Forest Lawn Drive for construction vehicle staging or parking, and a Project Design Feature has been added to incorporate this limitation. Please refer to Section II, Corrections and Additions, of this Final EIR. As required by Mitigation Measure I-3, set forth on page IV.I-34 of the Draft EIR, the Applicant shall ensure an information sign be posted at the entrance to the construction site that
includes a telephone number to call and receive information about the construction project, including a schedule of planned construction activity, or to report complaints. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment Letter No. 77

James Porras
Director of Career Services
Concorde Career Institute
12412 Victory Blvd.
North Hollywood, CA  91606-3134
www.concordecareercolleges.com

Comment No. 77-1

According to the Draft EIR on the Forest Lawn–Hollywood Hills project, without the new interment sites proposed as part of the Master Plan, Forest Lawn will run out of burial spaces within the next few years. Such an occurrence would be terribly distressing to numerous families who plan on having their loved ones interred at the Memorial Park, perhaps joining other family members already buried at Forest Lawn. Such continuity and the opportunity of family togetherness is important to many, many people. This project will ensure that Forest Lawn can continue to provide services at Hollywood Hills, which families need and deserve.

Additionally, extending the life of the memorial park will mean that the funding mechanism that provides for ongoing care and maintenance of the grounds and facilities will continue well into the future.

I think this is an excellent project that deserves community support.

Response to Comment No. 77-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 78

Bruce Rankin
Executive Director
Westside Food Bank
1710 22nd St.
Santa Monica, CA  90404
www.westsidefoodbankca.org

Comment No. 78-1
As Executive Director of Westside Food Bank I am writing to express our agency’s support for the proposed expansion of use at Forest Lawn’s Hollywood Hills Memorial Park.

Among local social service agencies, Forest Lawn is well known for its extraordinary community generosity, both through its foundation and through the individual giving of its employees. For nearly two decades Westside Food Bank has enjoyed pivotal support from Forest Lawn. Not only have we received funding that has allowed us to provide food for hundreds of thousands of meals for needy local individuals and families in Los Angeles, but the volunteering of Forest Lawn employees has been essential to our work as a food bank.

Generations of my own family have been interred at Forest Lawn in an environment of beauty and dignity. All of us at Westside Food Bank are grateful for the many ways that Forest Lawn strengthens the fabric of the Los Angeles community. Please grant Forest Lawn permission to move ahead with its plans for the Hollywood Hills Memorial Park.

Response to Comment No. 78-1
The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 79

Rev. Mark R. Sandstrom  
Pastor  
Covina Christian Church (Disciples of Christ)  
240 S. Grand Ave.  
Covina, CA  91724  
covinachristian@verizon.net

Comment No. 79-1

As Pastor of the Covina Christian Church (Disciples of Christ) I am writing to express our appreciation and support of Forest Lawn’s proposed expansion of their Hollywood Hills facility. Forest Lawn provides many valuable services to the community and houses of faith. It would be a terrible loss if they could no longer provided these simply because they ran out of interment sites.

I have witnessed firsthand the kindness, compassion and professionalism that Forest Lawn provides to everyone who walks through their doors. They are one of the few Mortuaries and Cemeteries that serve the needs of everyone in our community with dignity and honor.

Many of my own family have been laid to rest at this very facility. When I as a Pastor preside over the funeral of someone at Forest Lawn Hollywood Hills, I always take the time to visit the grave sites of my family. It would be sad if others were not given the same comfort as I am.

It is with pleasure that we at Covina Christian Church lend our support in favor of the approval of the proposed expansion plan. In this way Forest Lawn will be able to continue their very important role in our community.

Response to Comment No. 79-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 80

David Snow  
Executive Director  
Upward Bound House  
1104 Washington Ave.  
Santa Monica, CA  90403  
www.upwardboundhouse.org

Comment No. 80-1

I am writing to express my support of Forest Lawn’s proposed expansion. Forest Lawn is one of the few area cemeteries that serve the needs of the community and it is imperative for Forest Lawn to have interment sites.

Upward Bound House provides housing and services to homeless families with children and low income seniors, some of whom rely on the dignified and professional services provided by Forest Lawn.

I strongly encourage the review committee to approve the proposed plan so that Forest Lawn can continue to serve the greater Los Angeles community for years to come.

Should you have any additional questions, please contact me at 310-458-7779 x202.

Response to Comment No. 80-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 81

Robert L. Snyder
Pastor
Community Christian Church of the Foothills
10193 Tujunga Canyon Blvd.
Tujunga, CA 91042

Comment No. 81-1

This purpose of this letter is to express on behalf of Community Christian Church of the Foothills, our support for Forest Lawn’s proposed expansion. Forest Lawn has been coming alongside the needs of families in Los Angeles for decades and it would a great loss to the community as well as to the city of Los Angeles if they were unable to provide a final resting place for the loved ones who are already going through an extreme season of loss and grief.

Indeed Forest Lawn is one of the few area cemeteries that faithfully serve the needs of everyone who lives in our great city of Los Angeles. They come alongside families who are enduring one of the most difficult times in their lives with dignity, compassion and integrity.

It is because of the long history of Forest Lawn’s professionalism as well as personal service that so many of those in our community choose Forest Lawn Hollywood Hills as their final resting place.

Granted we are all concerned about saving our wilderness space, yet Forest Lawn’s expansion will create a beautiful place not only for those looking at the hillside but for all those who need somewhere to continue to grieve the lost of the loved one.

Therefore, we at Community Christian Church are in favor of the approval of the proposed plan so that Forest Lawn might continue their good work in for our city and community.

We hope those in the decision making process will concur that we need the service of Forest Lawn to be able to continue for the future needs of our city.

Response to Comment No. 81-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 82

Larry L. Stamper
Pastor Emeritus
Burbank First United Methodist Church
700 N. Glenoaks Blvd.
Burbank, CA  91502

Comment No. 82-1

I am writing in support of Forest Lawn’s request to develop additional cemetery space on their Hollywood Hills property.

For thirty two years, I served as senior pastor at the Burbank First United Methodist Church. During that time I presided at well over one thousand funeral services at Hollywood Hills. I never heard one negative comment about the beauty of the park or the maintenance of the property. The entire management team at Forest Lawn is totally dedicated to serving the community and being a good corporate citizen.

I also served on the Burbank City Council (1981–85) and as Mayor (1983–84). From that perspective I learned how supportive and cooperative Forest Lawn is to the local government and charitable organizations. The people of Burbank love the view of that hillside with its beautiful landscape and picturesque churches.

One of the great advantages of development is the safety of the animals during the fires that have devastated that hillside in recent years. Often, in the early morning and late evening the park is a refuge for the deer and other wildlife that roam its grounds. Forest Lawn is intentionally friendly to the animals as they help to create the natural atmosphere that Forest Lawn fosters.

One additional factor I would like to mention is the growing shortage of burial space not only at Forest Lawn but also in the Los Angeles area. If additional space is not permitted at Hollywood Hills it will have to be shifted to another location. We already have the track record of Forest Lawn and what they have already done is an example of what they will do in the future.

This is a much needed addition and I urge you to permit Forest Lawn to expand their beautification of the Hollywood hills [sic]. I also speak for the wildlife which partially depend on the cemetery as their source of water and the flowers the families leave at graveside. They especially love the roses which is their dessert each evening and morning.
III. Responses to Comments

Response to Comment No. 82-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 83

Rev. Bob Thomson
Co-Pastor
Woodland Hills Presbyterian Church
5751 Platt Ave.
Woodland Hills, CA 91367
www.woodlandhillspres.org

Comment No. 83-1

I’m writing to support the proposed expansion at Forest Lawn Hollywood Hills. As a member of the religious community in the San Fernando Valley I have officiated at several memorial services at their Hollywood Hills location.

I can testify to the vital service Forest Lawn provides for the people of this community. The staff of Forest Lawn provides professional and respectful services for people at their most vulnerable time dealing with the loss of a loved one. They are the most caring staff I have worked with.

It is vitally important for people dealing with their grief to have a local cemetery for the final resting place of their family members. It would be a great loss to the city if Forest Lawn could no longer accept new internments.

I am in favor of the city approving the proposed plan so that Forest Lawn may continue to provide the excellent service they do to this community.

Response to Comment No. 83-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 84

Dr. Wayne B. Walters
Senior Pastor
Burbank First United Methodist Church
700 N. Glencoe Blvd.
Burbank, CA  91502

Comment No. 84-1

I am the senior pastor of Burbank First United Methodist Church. Prior to my appointment here two years ago, I served as the pastor of Sierra Madre United Methodist Church, First United Methodist Church of Glendale, and La Canada United Methodist Church. All together I have been appointed to one of these churches for 22 years.

In each of these parishes I have conducted services for church members at Forest Lawn in Glendale and Hollywood Hills. In all cases I have found their services to be very supportive of bereaved families. Forest Lawn serves a critical need for both mortuary and cemetery services in this area.

I suppose the day will come when these cemeteries reach capacity but until the time comes when there is no possibility for them to utilize land they already own or can purchase nearby, I hope the city of Los Angeles will support any effort or step they make to maintain their ability to serve the citizens of our county for as long as possible.

They provide an invaluable service and with the limitation of open space in our communities for new developments, I think it is unlikely anyone else can provide the services they are already equipped to do.

Response to Comment No. 84-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 85

Anita Wright
Regional Director, Los Angeles
Braille Institute
741 N. Vermont Ave.
Los Angeles, CA  90029
www.brailleinstitute.org

Comment No. 85-1
Thinking about burial space running out is not something that one tends to ponder. I was surprised to learn, however, that Forest Lawn will potentially run out of internment sites in about five to six years. That would be most unfortunate for families in our community as they would be forced to seek sites elsewhere that could be much further away.

Besides the incredible visual beauty of Forest Lawn Hollywood Hills, the real beauty is their “open door” policy – where everyone is welcome regardless of religious affiliation or beliefs. It’s important that the services they provide continue to be available to everyone in our community.

The Draft EIR details that the project has been designed to be compatible with the existing park. It’s important that the proposed new facilities will be integrated into the memorial park to maintain the high standards that we’ve all come to expect from Forest Lawn.

I would encourage you to move this project forward in a timely manner. It’s important that Forest Lawn continues to be there for the community it serves.

Response to Comment No. 85-1

The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 86

Rev. Alice Parsons Zulli, FT
Chaplain Associate
Board Certified Pastoral Counselor
Director, Bereavement Support and Services
Glendale Adventist Medical Center
1509 Wilson Ter.
Glendale, CA  91206

Comment No. 86-1
This letter is written in support of Forest Lawn's proposed expansion.

As a minister who presides at funerals, many at Forest Lawn, I acknowledge the need for expansion based on the continued growth of the City of Glendale and the surrounding communities. The land intended for expansion has been owned by Forest Lawn for many years. This expansion would continue to allow Forest Lawn to serve the needs of people in the Southern California communities.

Forest Lawn Hollywood Hills has been a cherished cemetery in my family since I was a small child. The beauty, the art, and the County-wide functions have long drawn people to the site. I work professionally with the bereaved in the BEYOND LOSS program at Glendale Adventist Medical Center serving a wide radius of communities. Therefore, I believe that any expansion would continue to provide a place of dignity and honor to those who seek their services.

Again, I support the approval of the proposal plan so that Forest Lawn may continue to serve the needs of the people seeking their services as well as those who wish to enjoy the beautiful park-like setting and priceless art.

Response to Comment No. 86-1
The comments in support of the Project are acknowledged and will be forwarded to the decision-makers for their consideration.
Comment Letter No. 87

Lewis MacAdams
Founder and President
Friends of the Los Angeles River
570 W. Avenue 26, Ste. 250
Los Angeles, CA  90065-1047
mail@folar.org
www.folar.org

Comment No. 87-1

Friends of the Los Angeles River (FoLAR) submits this letter and the attachment as its comments on the referenced DEIR. The attachment was prepared in response to a request for comments from the U.S. Army Corps of Engineers on the application for a Clean Water Act Section 404 permit for the project. However, FoLAR’s comments on the proposed Section 404 permit are directed primarily at what we believe to be inadequacies in the DEIR and we request that you accept these as comments on the DEIR.

Response to Comment No. 87-1

This comment letter was submitted after the close of the public comment period. The introductory comments are noted and have been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft EIR are provided and responded to below.

Comment No. 87-2

In addition to these comments, we believe the DEIR fails to assess the cumulative impacts of this project and others proposed for the immediate vicinity, particularly the cumulative impacts on the Los Angeles River. Currently in progress is the Los Angeles Department of Water and Power’s massive Headworks Project, immediately adjacent to the Forest Lawn property and the proposed project. Also, the proposed NBC Universal Evolution Plan, with potentially significant impacts on the River, is approximately one mile from the current project. It is essential that the applicant address the cumulative impacts of these three projects on the River, along with other potential cumulative impacts such as traffic and air quality.

We appreciate the opportunity to submit these comments.
Response to Comment No. 87-2

The Los Angeles Department of Water and Power's Headworks project (also known as the Silver Lake Reservoir Complex Storage Replacement Project) and the NBC Universal Evolution Plan are described on page III-29 of the Draft EIR, and their location in relation to the Project Site is depicted on Figure III-1, Related Projects Location Map, on page III-28 of the Draft EIR. These are two of the related projects listed in the Draft EIR, which noted that the cumulative impact analysis presented in the Draft EIR is based on the list of related projects set forth on pages III-27 through III-30 of the Draft EIR. Pursuant to the CEQA Guidelines, an EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable. (CEQA Guidelines, Section 15130(a).) A cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. Pursuant to the CEQA Guidelines, an EIR should not discuss impacts which do not result in part from the project evaluated in the EIR. (CEQA Guidelines, Section 15130(a)(1).) As noted on page V-1 of the Draft EIR, the proposed Project would not result in any significant and unavoidable impacts. Potential cumulative biological resources impacts are discussed on page IV.C-43 of the Draft EIR, which concludes that the Project would not result in cumulative impacts to biological resources. Potential cumulative traffic impacts are discussed on page IV.J-14 of the Draft EIR, which concludes that the Project's potential traffic and circulation impacts would be less than significant. Potential cumulative impacts with respect to air quality are discussed on page IV.B-27 of the Draft EIR, which concludes that the Project would not result in cumulative impacts to air quality. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 87-3

Friends of the Los Angeles River (FoLAR) is submitting these comments in response to the referenced notice and application for a Clean Water Act Section 404 permit for the master plan for major expansion of Forest Lawn Cemetery adjacent to Griffith Park and the Los Angeles River in the City of Los Angeles. (“Notice”) FoLAR is a 501(c) 3 non-profit organization founded in 1986. Our mission is to protect and restore the natural and historic heritage of the Los Angeles River and its riparian habitat through inclusive planning, education and wise stewardship. Among our goals are developing recreational and commuter bikeways, pedestrian paths and horse trails on the riverbanks, fostering efforts to monitor and improve water quality in the River and its tributaries, and creating healthy river-related ecosystems.

Response to Comment No. 87-3

The comment is a copy of a letter submitted by the Commentor to the Army Corps of Engineers in response to the Army Corps’ publication of a Public Notice for the Project in connection with the Army Corps’ permitting process. As noted in the Project Description in
the Draft EIR, in addition to the discretionary actions requested of the City, the proposed Project would require regulatory permits, including an Individual 404(b) Permit from the Army Corps of Engineers, a 401 Water Quality Certification from the Regional Water Quality Control Board, and a Streambed Alteration Agreement from CDFG. (See page II-21 of the Draft EIR.) As the Draft EIR further explains, the City serves as the Lead Agency for the EIR pursuant to CEQA, and a National Environmental Policy Act clearance will also be prepared with respect to the portion of the Project within the Army Corps of Engineers’ jurisdiction, with the Army Corps of Engineers serving as the Lead Agency for that clearance. (See pages II-21 through II-22 of the Draft EIR.) The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 87-4

Our comments are directed to the potentially significant impacts of the project on the Los Angeles River (“River”) during both the extended construction period and subsequent operation. Our understanding of the project is that it will be a massive cut and fill operation with construction of numerous facilities. Particularly, with regard to the extensive areas, completely changing the topography and view shed the generation and disposal of fill, and discharges from both construction and operation have the potential to significantly impact the River,

Response to Comment No. 87-4

As noted in the Draft EIR on page V-1, implementation of the proposed Project would not result in any significant and unavoidable environmental impacts. As explained on page II-11 of the Project Description in the Draft EIR, it is estimated that over a 15-year construction period, implementation of the proposed Project would require approximately 1,728,000 cubic yards of cut, approximately 1,015,000 cubic yards of fill, and a net export amount of approximately 713,000 cubic yards. It is estimated that construction of new structures, including approximately 22,500 square feet of floor area (for such structures as a new church and reception-related uses) and approximately 1,100,000 square feet of non-occupied floor area (for such uses as burial garden structures, wall crypts, and columbaria) would occur over an approximately 40-year period. As explained in Section IV.A, Aesthetics, of the Draft EIR, Project impacts to visual character and viewsheds would be less than significant (see pages IV.A.42 and IV.A.43 of the Draft EIR). Although impacts related to aesthetics are anticipated to be less than significant, the Draft EIR includes mitigation measures to further reduce the proposed Project’s less-than-significant impacts. Mitigation Measure A-3, set forth on page IV.A-45 of the Draft EIR, provides that natural features, such as prominent knolls or ridge lines, shall be preserved. Further, as the Draft EIR notes on page IV.E-16, in Section IV.E, Geology/Soils, there are no distinct and prominent geologic or topographic features that would be adversely affected by the Project. The Draft EIR includes mitigation with respect to cut and fill slopes and requires the
implementation of erosion control and dust control measures. (See Mitigation Measure E-1 on pages IV.E-17 through IV.E-21 of the Draft EIR.) Further, as discussed in Section IV.G, Hydrology/Water Quality of the Draft EIR, implementation of the proposed Project would not violate any water quality standards or waste discharge requirements and would not otherwise substantially degrade water quality. (See page IV.G-25 of the Draft EIR.) Although the Project would result in less-than-significant impacts with respect to water quality during construction and operation, thirteen mitigation measures are included in the Draft EIR (see Mitigation Measures G-1 through G-13 on pages IV.G-24 and IV.G-25 of the Draft EIR) and would further reduce the Project’s less-than-significant impacts.

Comment No. 87-5

We find the information contained in the Notice insufficient to understand the scope of the project and its impacts for purposes of the §404 permit. To attempt to compensate for this, we have relied primarily on the City of Los Angeles Draft Environmental Impact Report for the Master Plan35 (“DEIR”) as well as personal observations of the site and surrounding areas. (In doing this, we are assuming that the DEIR will be the best information available to the Corps in reviewing the permit application, although we understand that additional data may be developed). However, in certain key respects as noted below the DEIR is also inadequate to understand the impacts and to develop permit conditions and other mitigating measures.

Major aspects of the proposed project bring it within the EPA Section 404(b) (1) Guidelines for disposal of dredged or fill material.36 (“EPA Guidelines”) In this regard, we support the comments of the Endangered Habitat League which are directed principally at the application of the Guidelines. Overall, we find the description of certain impacts of the master plan on the River to develop the necessary 404 permit conditions, particularly considering the EPA Guidelines (40 CFR 230) for such permits, to be inadequate. Also, as discussed in more detail below, the mitigating measures as proposed in the DEIR are similarly insufficient.

Our comments address the following topics related to the §404 permit application:

- Scope of §404 Permit Considerations: Waters of the United States
- Hydrologic and Water Quality Impacts
- Aesthetic and Land Use impacts

III. Responses to Comments

- Adequacy of Mitigation Measures and Recommendations
- Mitigating Measures

Response to Comment No. 87-5

The comment refers to the Army Corps' publication of a Public Notice for the Project in connection with the Army Corps' permitting process, which is separate from the requested City entitlements and environmental review of the Project under CEQA. As noted in the Project Description in the Draft EIR, in addition to the discretionary actions requested of the City, the proposed Project would require an Individual 404(b) Permit from the Army Corps of Engineers. (See page II-21 of the Draft EIR.) The City serves as the Lead Agency for the EIR pursuant to CEQA, and a separate National Environmental Policy Act clearance will be prepared with respect to the portion of the Project within the Army Corps of Engineers' jurisdiction, with the Army Corps of Engineers serving as the Lead Agency for that clearance. (See pages II-21 and II-22 of the Draft EIR.) An Application for a Department of the Army Permit for the Project was submitted to the Army Corps of Engineers in November 2010 and is attached to the Draft EIR as Appendix C-15. Information relating to the Army Corps' jurisdiction and potential jurisdictional impacts are summarized on page IV.C-38 of the Draft EIR and analyzed in detail in the Preliminary Determination of U.S. Army Corps of Engineers “Waters of the U.S.” and Wetlands Jurisdiction and Impact Analysis report, attached to the Draft EIR as Appendix C-7. Section 404 of the Clean Water Act is discussed on pages IV.C-3 and IV.C-4 of the Draft EIR, and pursuant to Mitigation Measure IV.C-21, set forth on page IV.C-54 of the Draft EIR, Forest Lawn shall obtain all necessary permits from the Army Corps, CDFG, and the RWQCB, as applicable, prior to the issuance of grading permits for the Project. Specific comments regarding the Army Corps permit application are beyond the scope of the EIR for the Project. Specific comments regarding the Draft EIR are provided and responded to below. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 87-6

A. Scope of §404 Permit Considerations; Waters of the United States.

On July 1, 2010, the US Environmental Protection Agency Issued its decision finding that the entire mainstream of the Los Angeles River is a traditional navigable waterway (TNW) susceptible to commercial navigation from its origin to the estuary at the Pacific Ocean, based on historical and current use, flows, and plans for future development.37 Prior to

37 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION IX, SPECIAL CASE EVALUATION REGARDING STATUS OF THE ANGELES RIVER, CALIFORNIA, AS A TRADITIONAL NAVIGABLE WATER, July 1, 2010 [sic]
that, the Corps had determined that only about 3 miles of the River was a TNW. This
decision means that the entire 51 miles of the River and its tributaries are subject to the
jurisdiction of the Federal Clean Water Act (CWA), including §404. With respect to the
current project, the protected body of water for CWA purposes is not just the acreage on
the Forest Lawn property, but the entire River.

Both the DEIR and the Notice characterize the affected waters of the United States as
consisting of 2.37 acres of waters of the United States on the Project Site: 1.73 acres of
non-wetland “waters” and 0.64 acre of wetland. (However, there is an inconsistency here
in that the DEIR also points to 6.65 acres of Corps jurisdictional waters. The Notice thus
appears to restrict §404 permit jurisdiction, including mitigation, only to these areas where
there is actual disturbance of this acreage. If we are correct that this is the intent of the
Notice, this is not the appropriate basis to examine this project for permitting purposes.
Clearly, the ongoing discharge of project water, both stormwater and from operations, will
impact the main channel of the River.

Response to Comment No. 87-6

As explained on page IV.C-4 of the Draft EIR, Section 404 of the Clean Water Act
requires a federal license or permit before dredged or fill material may be discharged into
waters of the United States. Section 401 of the Clean Water Act requires any applicant for
a federal license or permit to conduct any activity that may result in a discharge of a
pollutant into waters of the United States to obtain a certification that the discharge will
comply with the applicable effluent limitations and water quality standards. As the Draft
EIR explains, there are a total of 6.65 acres of potential Corps jurisdictional “waters of the
U.S.” on the Project Site. (See page IV.C-25 of the Draft EIR.) The Project has the
potential to permanently impact 2.26 acres of these 6.65 acres of waters, as explained on
page IV.C-38 of the Draft EIR and Section II, Corrections and Additions, Subsection IV.C,
Biological Resources of this Final EIR. Thus, the Project requires an Individual 404(b)
Permit from the Army Corps of Engineers. Please refer to Response to Comment No. 87-5
for information regarding the Army Corps permit and jurisdictional analysis. Specific
comments regarding the Army Corps notice and permitting process are beyond the scope
of the EIR for the Project. With respect to discharges to the Los Angeles River, as
discussed on page IV.G-24 in Section IV.G, Hydrology/Water Quality, of the Draft EIR, for
purposes of assessing the proposed Project’s impacts to surface water quality, the
diographic limits of the area of potential affect include the receiving waters of on-site
tributaries, Sennett Creek, and the Los Angeles River Flood Control Channel.

Implementation of the proposed Project would not violate any water quality standards or

38 DEIR P. IV.C.25 [sic]
waste discharge requirements and would not otherwise substantially degrade water quality. (See page IV.G-25 of the Draft EIR.) Nevertheless, although the Project would result in less-than-significant impacts with respect to water quality during construction and operation, 13 mitigation measures are included in the Draft EIR (see Mitigation Measures G-1 through G-13 on pages IV.G-24 and IV.G-25 of the Draft EIR) and would further reduce the Project’s less-than-significant impacts. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 87-7**

Further, in discussing project alternatives, the DEIR states that a §404 permit can be avoided if the project is modified to exclude the water of the United States on the project site.39 This is similarly incorrect.

**Response to Comment No. 87-7**

The comment questions Alternative 5, the No Federal Action alternative analyzed in Section VI, Alternatives, of the Draft EIR. As explained on page VI-51, the proposed development in the undeveloped portions of the Project Site under Alternative 5 would be altered and reduced to avoid all of the potentially federal jurisdictional drainages or “waters of the U.S.” on the Project Site. Accordingly, Alternative 5 would not require an Individual 404(b) Permit from the Army Corps. However, as noted on page VI-57 of the Draft EIR, like the proposed Project, Alternative 5 would be required to meet water quality standards and waste discharge requirements. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 87-8**

As noted below under Hydrology and Water Quality, the project will result in large amounts of additional sediment due to cut and fill on over 100 acres of steep terrain. To attempt to control this, there eventually will be 12 additional drainage basins. However, these basins are only a temporary holding point to reduce discharge flows. During storm events there is a high probability that sedimentary and other discharges will reach the River. While there is no direct dredge or fill taking place directly in the River channel, the channel will be impacted by uncontrolled cut and fill materials from the project, and from the vast Sennett Creek drainage, encompassing much of the north-facing part of Griffith Park. It is our view that this should be considered in the decision whether to issue a §404 permit, and in

39 DEIR P. 1-10 [sic]
developing permit conditions and mitigating measures. This conclusion flows from the basic premise that the purpose of the EPA decision is to protect the River itself as a traditional navigable waterway, not just the tributaries such as Sennett Creek.

Response to Comment No. 87-8

Hydrology and Water Quality are addressed in Section IV.G, Hydrology/Water Quality, of the Draft EIR. As explained therein on pages IV.G-2 and IV.G-3, the Project’s hydrological drainage area encompasses approximately 930 acres and is divided into three separate drainage areas, referred to as Drainage Areas “A,” “B,” and “C.” Drainage Area A occupies approximately 180 acres of the southwest portion of the Project Site, adjacent to the south side of Forest Lawn Drive, and all stormwater in this area flows into Drainage “L,” which drains into the Los Angeles River Flood Control Channel via 48-inch reinforced concrete pipe storm drains under Forest Lawn Drive. A total of three debris basins are proposed in Drainage Area A, as explained on page IV.G-21 of the Draft EIR, one of which was constructed as an interim project, as explained on page G-5 of the Draft EIR. Drainage Area B occupies approximately 700 acres and includes Sennett Creek, which outlets into the Los Angeles River Flood Control Channel through three existing 60-inch pipes under Forest Lawn Drive. As explained on page IV.G-22 of the Draft EIR, to accommodate stormwater flows in Drainage Area B, debris basins are proposed along the southern Project Site boundary to collect debris from the hillside south of the Project Site. The design runoff within the Project’s hydrological drainage area would be managed so as not to exceed the recommended and allowable runoff flows determined by the Los Angeles County Department of Public Works. (See pages IV.G-22 and IV.G-23 of the Draft EIR.)

As noted on page IV.G-24 of the Draft EIR, for purposes of assessing the proposed Project’s impacts to surface water quality, the geographic limits of the area of potential affect include the receiving waters of on-site tributaries, Sennett Creek, and the Los Angeles River Flood Control Channel. As discussed in the Draft EIR, the anticipated quality of effluent expected from the Project Site would not contribute loads or concentrations of pollutants of concern that would be expected to cause or contribute to a violation of the water quality standards in the Project’s receiving waters. In addition, the Project’s compliance with the Standard Urban Stormwater Mitigation Program requirements and implementation of a number of specific Project Design Features (PDFs), including site design, source control, and treatment control Best Management Practices (BMPs), would ensure the project is in compliance with the TMDL requirements for the Los Angeles River Channel watershed, and, as the Draft EIR concludes, potential impacts with respect to water quality would be less than significant. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment No. 87-9

B. Hydrologic and Water Quality Impacts

The major concern for permitting purposes is the impact of the project on the River. Neither the DEIR nor the Notice address the hydrologic and water quality impacts on the River, both of which are essential in determinations related to a §404 permit. As pointed out in the previous discussion, the on-site Corps jurisdictional waters would not even have this status if it weren’t for the USEPA’s determination that the River is a traditional navigable water, and thus a water of the United States. To ignore the impact of the project on the River is a major inadequacy.

To understand the impact, the analysis must include both the quantity of water discharged to the River and the quality of that water,

Response to Comment No. 87-9

The comment is addressed in Response to Comment Nos. 87-6 and 87-8. Please refer to Response to Comment Nos. 87-6 and 87-8.

Comment No. 87-10

1. Hydrology. The Notice and DEIR are silent as to the amount of water which will ultimately reach the River during construction and operation of the project, including both storm water and drainage from normal operations. With a total drainage area of 960 acres (700 acres Sennett Creek-Royce Canyon, Drainage “L” 180 acres, balance miscellaneous), and the addition of significant new graded terrain to the existing drainage, there is a high probability that drainage to the River will increase substantially. Most of this will occur in Sennett Creek and Drainage L, which flow directly to the River. The balance is runoff to Forest Lawn Drive, which appears also to drain to the River through city storm drains. At a minimum, the following need to be addressed:

- Destruction of the vast majority of the native vegetation in the project area will have a major impact and is not adequately described. The existing chaparral and riparian vegetation has evolved to have moisture absorbing and retention capability. This loss will dramatically alter hydrologic flows. Quite simply, how does the absorption of the proposed new terrain and vegetation compare with the existing conditions?

40 DEIR Appendix G appears to indicate this would be the case, but consists mostly of engineering calculations and is difficult to follow. Note also that this is carefully labeled by the consultant as both “preliminary” and “proposed”, [sic] indicating that much additional work is probably required,
III. Responses to Comments

- The DEIR hypothesizes a “post burn” runoff scenario to calculate runoff, but it is important to note that a burn does not kill off the plants, and generally leaves the root systems in tact from which they quickly regenerate and resume moisture and runoff absorbing capability. This will not be the case with the project, where the plants are to be destroyed, which calls into question whether this is the correct basis for the analysis.

- The DEIR relies primarily on the construction of additional drainage control basins as a mitigating measure. However, this does not change the flow to the River, but merely delays the discharge.

- The DEIR discusses the use of recycled water for irrigation, but does not specify that amount of water which can be expected to eventually run to the River from irrigation and other activities which might generate excess water. This is important, because any contaminants in the water will be much more highly concentrated during non-storm runoff.

- There is a discussion of best management practices (BMPs) which may be implemented for the project, some of which may serve to control the amount of flow that reaches the River. But more specificity is needed to indicate where and how these might be employed, and more importantly, what their quantitative effect will be on the quantity of water discharged.

Response to Comment No. 87-10

The proposed Project would not substantially alter flows to the Los Angeles River. As explained on pages IV.G-21 and IV.G-22 of the Draft EIR, the total burned and bulked flow in the Drainage L watershed (Drainage Area A) is approximately 369 cubic feet per second under existing conditions and would remain comparable under the proposed Project. With respect to the Sennett Creek watershed, the total burned and bulked flow rate under the proposed Project would also be comparable to the current total burned and bulked flow rate. The proposed Project would upgrade 17 storm drain systems (68 segments) within the Project Site. Storm drains would be sized with sufficient hydraulic capacity to accommodate the design hydrology and would be installed under private roadways within the Memorial-Park for ease of maintenance. Further, the proposed Project would also include the development of debris basins in Drainage Areas A and B to retain debris and reduce the overall total volume of stormwater flows. The design runoff within the Project’s hydrological drainage area would be managed so as not to exceed the recommended and allowable runoff flows determined by the Los Angeles County Department of Public Works. (See pages IV.G-22 and IV.G-23 of the Draft EIR.) Mitigation Measure G-8, set forth on page IV.G-25 of the Draft EIR, provides that the proposed Project shall be designed such that post-development peak stormwater runoff discharge rates shall not exceed the estimated pre-development rate. A signed certificate from a California licensed civil engineer to confirm that the proposed Project is designed in such a manner shall be required.
Less than half of the Project’s grading footprint involves natural habitat areas, as approximately 70.42 acres of natural vegetation communities on the Project Site would be included within the Project’s proposed grading area of approximately 147 acres. The Project’s grading footprint includes approximately 75 acres of previously disturbed areas of the Project Site. As explained on page IV.G-17 in Section IV.G, Hydrology/Water Quality, of the Draft EIR, the proposed Project includes a number of specific Project Design Features (PDFs) that would be implemented to reduce or avoid water quality impacts and hydrologic impacts. The site design, source control, and treatment control Best Management Practices (BMPs) that would be incorporated into the proposed Project as PDFs are described on pages IV.G-17 through IV.G-19 of the Draft EIR. These BMPs would include vegetated BMPs, which are a type of BMP that utilizes the natural water quality improving characteristics of soils, plants, and microbes to improve the quality of stormwater flows. Vegetated BMPs provided by the proposed Project would include grassed swales, filter strips, and bioretention area, and they would be implemented at the adjacent hillsides along the boundaries of the Project Site’s development areas. (See page IV.G-17 of the Draft EIR.) The Project would also include volume-based treatment control BMPs, addressed on page IV.G-18 of the Draft EIR, such as the debris basins proposed within Drainage Area B. These basins would be sized to capture and treat annual runoff volumes from the tributary drainage areas. As the Draft EIR explains, the size of the debris basins and storm drain facilities would be finalized during the design stage by the Project engineer with the final hydrology study, which would be approved by the City prior to issuance of the final grading permit(s). All proposed basins would exceed required design capacities for 50-year flow rates. In addition, as explained on page IV.G-19 of the Draft EIR, landscape watering in interment and garden areas under the proposed Project would use efficient irrigation technology to minimize excess watering (see the water conservation PDFs described on page IV.B-42 of the Draft EIR). The vegetated BMPs described above would infiltrate and/or provide treatment for dry weather flows and small storm events. In addition, Mitigation Measure G-7, set forth on page IV.G-25 of the Draft EIR, requires the proposed Project to implement stormwater BMPs. The design of structural BMPs in all new construction areas shall be to the satisfaction of the City. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 87-11

2. Water quality. The DEIR states that “the proposed Project would not violate any water quality standards or waste discharge requirements, and would not otherwise substantially degrade water quality.”\(^\text{41}\) This statement, essential in considering the §404 permit application, is not supported by data in the DEIR. Rather, the DEIR contains a reasonably

\(^{41}\) DEIR p. IV.G-25 [sic]
detailed list of applicable regulations and the responsible agencies. However, it fails to state with any specificity how each of these would be applied to the project, or, in fact, whether a regulation would be applicable.

The following, at a minimum, need to be addressed in order to adequately understand the water quality impacts on the River and to establish needed mitigation measures:

- **Pollutants.** Forest Lawn is well-maintained as a large, grassy open space. In some respects, it is similar to a golf course, in essence a large lawn, but unique in that it abuts what in essence is an urban wilderness which can introduce a range of flora and fauna. All this must be controlled to maintain an acceptable cemetery environment. Generally, maintaining this artificial environment requires substantial use of chemicals. While there is some discussion of this, much more is needed.

  (a) Pesticides. The pesticides currently in use or proposed should be specifically listed. The DEIR suggests that there is major use of rodenticides, insecticides and other pesticides. Such factors as persistence, likelihood of entering runoff, potential impact on the River, MSDS data, potential hazards to humans and wildlife, etc., should be evaluated. The DEIR references that an “integrated pest management system” could be employed, but this is not listed as a mitigating measure under Water Quality. What does/will this consist of, and what will be its effect on reduction of pesticide use?

  (b) Fertilizers. There is no discussion of fertilizer use. Both organic and, inorganic fertilizers can have a significant effect on the water quality of the River. Fertilizers currently used as well as those that might be employed in the future must be discussed. The same data should be provided for these as for pesticides

  (c) Herbicides. Herbicides are commonly employed to control plants which are inconsistent with the intended use of a grassy area. This is likely to be even more common with this project because it is adjacent to an urban wilderness which will send extensive varieties and quantities of seeds into the project area. No data is provided in the DEIR on current or projected herbicide use.

**Response to Comment No. 87-11**

As explained on page IV.G-24 of the Draft EIR, the anticipated quality of effluent expected from the Project Site would not contribute loads or concentrations of pollutants of concern that would be expected to cause or contribute to a violation of the water quality standards in the Project’s receiving waters. In addition, the Project’s compliance with the Standard Urban Stormwater Mitigation Program requirements and implementation of a number of specific Project Design Features, including site design, source control, and treatment control Best Management Practices (BMPs), would ensure the project is in
compliance with the TMDL requirements for the Los Angeles River Channel watershed, and, as the Draft EIR concludes, potential impacts with respect to water quality would be less than significant.

Pesticide control is included among the Project Design Features that would be implemented to reduce or avoid water quality impacts and is discussed on page IV.G-18 of Section IV.G, Hydrology/Water Quality, of the Draft EIR, as well as in Section IV.F, Hazardous Materials/Risk of Upset, which notes that the Federal Insecticide, Fungicide, and Rodenticide Act establishes regulations for the proper use, storage, and disposal of pesticides. Pesticide management activities are subject to Federal regulations. (See page IV.F-14 of the Draft EIR.)

To clarify, the Draft EIR does not suggest that there is major use of rodenticides, insecticides, and other pesticides. As explained in the Draft EIR, in order to maintain a safe and attractive environment, Forest Lawn makes an effort to keep its outdoor public open space and lawns free of destructive rodent infestations. Rodent damage can create safety hazards for visitors and employees, in addition to doing extensive damage to the cemetery grounds. Rodents of concern include pocket gophers, ground squirrels, and meadow mice. Fumigants and baits are used in a controlled manner as necessary for rodent control on the Project Site, and dead rodents are promptly removed. All of the control products used are registered by the State of California for the specific target pest and applied by a State-licensed certified applicator. Pest control contractors apply pesticides around buildings on a monthly basis. Trapping is used infrequently on-site.

The pesticide control Project Design Feature discussed on page IV.G-18 includes incorporation of an integrated pest management program for common area landscaping on the Project Site. The integrated pest management program is explained in detail on pages IV.F-20 and IV.F-21 of the Draft EIR. The goal of an integrated pest management program is to keep pest levels at or below threshold levels, reducing risk and damage from pest presence, while reducing the risk from the pest control methods used. Integrated pest management programs achieve these goals through the use of low risk management options by emphasizing use of natural biological methods and the appropriate use of selective pesticides. Integrated pest management programs also incorporate environmental considerations by implementing procedures that minimize intrusion and alteration of biodiversity in ecosystems. Further, all pesticides would be handled, stored, and applied in accordance with applicable regulations and all manufacturer recommendations. In accordance with these requirements, the proposed Project would include source control measures, such as education programs for employees in the proper application, storage, and disposal of pesticides that will be used at the Project Site. Therefore, implementation of the integrated pest management plan and rodent control practices in accordance with the principles described above and the handling of all
pesticides in accordance with all applicable regulations and recommendations would ensure the proposed Project would not result in a significant impact upon the environment.

With respect to fertilizers, only a small percentage, approximately 6 percent, of the developed cemetery is fertilized on a routine basis. The recycled water used for irrigation meets the needs of the large majority of the grounds. Spot applications are occasionally applied, as needed, to small areas on the grounds, usually in response to a request regarding a specific grave site; however, these spot applications generally comprise a few square feet and a very small amount of product. Fertilizers are used in garden areas and around main buildings at the Project Site. The annual average amount of fertilizer used is estimated to be approximately 4,000 pounds per year, and approximately 1,000 pounds per year of plant food is used in planter areas. Strict best management practices are used during fertilizer applications. They include:

1. Protection of storm drain inlets in the vicinity;
2. Sidewalks, curbs and gutters are swept or blown back onto the turf prior to any irrigation;
3. Storm drains are inspected after the inlet protection is removed and any material is collected prior to irrigation;
4. Irrigation is applied to the treated areas without runoff occurring; and
5. All empty fertilizer bags are disposed of promptly and in a manner that prevents any residue from escaping and entering the storm drain system.

With respect to herbicides, as discussed in Section IV.F, Hazardous Materials/Risk of Upset, of the Draft EIR, Forest Lawn applies a pre-emergent herbicide as part of its lawn maintenance. (See page IV.F-10 of the Draft EIR.) Granular pre-emergent herbicides are used in gardens and planters (approximately 375 pounds per year). Approximately 75 gallons per year of liquid pre-emergent herbicides are also used, as well as approximately 35 pounds per year of molluscicide for slug and snail control in gardens.

The use of pesticides, fertilizers, and herbicides under the proposed Project is anticipated to be consistent with the current practices described above, though the overall amounts used may increase a small amount as additional garden areas and planters are installed. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment No. 87-12

(d) Discharge calculations. In addition to a complete qualitative discussion of the pollutant discharges from the proposed project, there should be initial calculations of the quality of the discharge, i.e., the range of concentrations that might be expected from each of the chemicals (organic and inorganic) that will be used by the project.

- Water Quality Data. There is no baseline data for the two existing discharge points to the River from the project site (Sennett Creek and Drainage L). It is not possible to establish the potential impacts on the River without a baseline to compare the additional discharges which might be expected. Because the discharge is in effect “point source” from the two discharge points, this data should be relatively easy to obtain by a periodic sampling program.

Response to Comment No. 87-12

As explained on page IV.G-24 of the Draft EIR, the anticipated quality of effluent expected from the Project Site would not contribute loads or concentrations of pollutants of concern that would be expected to cause or contribute to a violation of the water quality standards in the Project’s receiving waters. In addition, the Project’s compliance with the Standard Urban Stormwater Mitigation Program requirements and implementation of a number of specific Project Design Features, including site design, source control, and treatment control Best Management Practices (BMPs), would ensure the project is in compliance with the TMDL requirements for the Los Angeles River Channel watershed, and, as the Draft EIR concludes, potential impacts with respect to water quality would be less than significant.

Nevertheless, in response to the comment, surface water sampling was conducted in Sennett Creek on July 1, 2011. Included in the analysis based on substances potentially associated with on-site uses and for comparison to Los Angeles River TMDLs were: active ingredients of herbicides used on the Project Site since 2009 (2,4-D, Dicamba, Glyphosate, Oxadiazon, Prodiamine); all pollutants listed in established TMDLs for the Los Angeles River Reach [4] (ammonia, lead, copper, nitrates); and other general water quality parameters (total suspended solids, phosphorus, oil and grease, biological oxygen demand).

As the Draft EIR explains in Section IV.G, Hydrology/Water Quality, on page IV.G-3, Sennett Creek enters the Forest Lawn Memorial-Park property in the southern portion of the Project Site where stormwater flows from the north-facing slopes of the Santa Monica Mountains converge into a more distinct channel and flow onto the Project Site. Sennett Creek flows through the Project Site to an adjacent property, owned by Junior Achievement of Southern California, Inc., where waters from Sennett Creek then enter three corrugated metal pipes, each approximately 60 inches in diameter, located underneath Forest Lawn
III. Responses to Comments

Drive. On the other side of the public right-of-way, the waters pass through a concrete outfall structure located on what appears to be Los Angeles Department of Water and Power property, to an outlet into the concrete channel of the Los Angeles River. When the sampling was conducted, no surface water was found in Sennett Creek where it enters the Project Site at the upstream border with Griffith Park, nor where it exits the Project Site at the downstream border with the Junior Achievement property. Accordingly, sampling was conducted at the farthest point upstream that surface water appeared within Sennett Creek on the Project Site, at the location of the proposed crossing in the southeast portion of the Project Site, west of Drainages M and B. This location serves as functional background location because it is up-gradient of all existing developed cemetery on the Project Site. Sampling was also conducted at the farthest point downstream that surface water was found in Sennett Creek, which was approximately 180 yards downstream of the existing middle crossing of Sennett Creek within the developed cemetery at Memorial Drive. The water in both sample locations was clear and free of debris. The following nine constituents were not detected at either sampling location: ammonia, copper, Dicamba, Glyphosate, oil and grease, Oxadiazon, Prodiamine, total suspended solids, and 2,4-D. Low concentrations of phosphorus were detected (at 0.048 milligram per liter [mg/l] upstream and 0.067 mg/l downstream). Nitrate was not detected upstream, but a low concentration (1.7 mg/l) was detected downstream. Lead was not detected upstream, but the downstream sample contained lead at the laboratory detection limit (0.005 mg/l), below the Los Angeles River TMDL. Biological oxygen demand was found upstream at 5.2 mg/l, but not detected downstream. Based on these results, water quality in Sennett Creek is not being adversely affected by the adjacent cemetery use, as no significant contaminant concentrations were detected in either water sample.

Comment No. 87-13

- **Water Quality Standards.** The DEIR states that “the anticipated quality of effluent expected from the Project Site would not contribute loads or concentrations of pollutants of concern that would be expected to cause or contribute to a violation of the water quality standards in the Project’s receiving waters.” The “receiving waters” is the Los Angeles River, and there is, again, no support for this conclusion, other than a general reference to general regulatory requirements.\(^{42}\) There is no mention we can find in the hydrology/water quality section of the specific beneficial uses or Total Maximum Daily Loads (TMDLs) already established for the River, and there is no evaluation of the potential impact of the project on TMDLs. This is a major omission which makes it

\(^{42}\) In addition, the Project’s compliance with the Standard Urban Stormwater Mitigation Program requirements and implementation of the BMP measures discussed above would ensure the project is in compliance with the TMDL requirements for the Los Angeles River Channel watershed. Therefore, with compliance with all applicable laws, rules and regulations, no significant cumulative impacts to surface water quality are anticipated. **DEIR P. IV.G-24 [sic]**
impossible to discuss appropriate permit conditions or mitigating measures. TMDLs for trash, nitrogen and metals are in force for the River, and a TMDL for bacteria is under development. In addition to these, potential sediment load should be evaluated as part of the permit process.

Response to Comment No. 87-13

TMDLs and beneficial uses are discussed generally on page IV.G-6 of Section IV.G, Hydrology/Water Quality, of the Draft EIR, which explains that the Clean Water Act requires the states to adopt water quality standards for receiving water bodies and to have those standards approved by the EPA. Water quality standards consist of designated beneficial uses for a particular receiving water body (e.g., wildlife habitat, agricultural supply, fishing etc.), along with water quality criteria necessary to support those uses. Water quality criteria are either prescribed concentrations or levels of constituents, such as lead, suspended sediment, and fecal coliform bacteria, or narrative statements which represent the quality of water that support a particular use. When designated beneficial uses of a particular receiving water body are being compromised by water quality, Section 303(d) of the Clean Water Act requires identifying and listing that water body as “impaired.” Once a water body has been deemed impaired, a Total Maximum Daily Load (TMDL) must be developed for the impairing pollutant(s). A TMDL is an estimate of the total load of pollutants from point, non-point, and natural sources that a water body may receive without exceeding applicable water quality standards (with a “factor of safety” included). Once established, the TMDL allocates the loads among current and future pollutant sources to the water body. The Clean Water Act requires states to publish, every two years, an updated list of streams and lakes that are not meeting their designated uses because of excess pollutants (i.e., impaired water bodies). The list, known as the 303(d) list, is based on violations of water quality standards. Once a TMDL is developed and adopted into the Basin Plan, the water quality limited section is removed from the 303(d) list.

The applicable Basin Plan is discussed on pages IV.G-8 and IV.G-9 of the Draft EIR. As required by the California Water Code, the LARWQCB has adopted the “Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties” (Basin Plan). Specifically, the Basin Plan designates beneficial uses for surface and groundwaters, sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State’s antidegradation policy, and describes implementation programs to protect all waters in the Los Angeles Region. In addition, the Basin Plan incorporates (by reference) all applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations. The Basin Plan is a resource for the Regional Board and others who use water and/or discharge wastewater in the Los Angeles Region. In addition, the City’s Water Quality Compliance Master Plan for Urban Runoff, discussed on pages IV.G-10 and IV.G-11 of the Draft EIR, identifies and describes the various watersheds in the City, summarizes the water quality conditions of the City’s waters, identifies known sources of
III. Responses to Comments

pollutants, describes the governing regulations for water quality, describes the BMPs that are being implemented by the City, and discusses existing TMDL Implementation Plans and Watershed Management Plans.

TMDLs for Los Angeles River Reach 4, where the Project Site discharges, are established for metals (cadmium, copper, lead, selenium, zinc), nitrogen compounds (including ammonia), and trash. A TMDL for bacteria is proposed. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 87-14

- *Best Management Practices.* The DEIR states that “the proposed Project shall implement stormwater BMPs to retain or treat the runoff from a storm event. The design of structural best-management practices (BMPs) in all new construction areas shall be to the satisfaction of the City.” Again, simply referencing a future regulatory action is insufficient for permit considerations. The discussion of BMPs in the DEIR is seriously inadequate in the following respects.

  (a) Only a few BMPs are listed, there is no discussion of how and where the BMPs will be deployed, how they will function, and their effectiveness for specific contaminants. The short list of BMPs proposed does not provide guidance on how each will function to meet the objective of assuring that contaminants are not introduced into the River.

  (b) The overall objective must be to minimize flows to the River during storm events and during non-storm periods

  (c) There are potentially many more BMPs which are available to this project and which should be employed. The process of preparing a SWPPP involves applying, through civil engineering analysis, those controls necessary. The USEPA National Menu of Stormwater BMPs contains numerous BMPs which should be evaluated as to applicability to the project.43 In particular, each of the BMPs discussed by EPA for retention, detention, filtration, and infiltration, should be reviewed and discussed.

43 In addition, the Project’s compliance with the Standard Urban Stormwater Mitigation Program requirements and implementation of the BMP measures discussed above would ensure the project is in compliance with the TMDL requirements for the Los Angeles River Channel watershed. Therefore, with compliance with all applicable laws, rules and regulations, no significant cumulative impacts to surface water quality are anticipated. DEIR P. IV.G-24 [sic]
(d) The BMPs must be both structural and non-structural. The DEIR mentions a few structural BMPs but barely touches on non-structural practices which must be employed to reduce or eliminate the potential for stormwater pollutant loading.

(e) Of particular applicability, but lacking in the DEIR, are the “innovative BMPs” employing such available technologies as alternative paving, green roofs, green parking.

Response to Comment No. 87-14

As explained on page IV.G-17 in Section IV.G, Hydrology/Water Quality, of the Draft EIR, the proposed Project includes a number of specific Project Design Features (PDFs) that would be implemented to reduce or avoid water quality impacts and hydrologic impacts. The site design, source control, and treatment control Best Management Practices (BMPs) that would be incorporated into the proposed Project as PDFs are described on pages IV.G-17 through IV.G-19 of the Draft EIR. These BMPs would include vegetated BMPs, catch basin inserts, volume-based treatment control BMPs, and source control with respect to pesticides, trash and debris, and dry weather runoff. In addition, Mitigation Measure G-7, set forth on page IV.G-25 of the Draft EIR, requires the proposed Project to implement stormwater BMPs. The design of structural BMPs in all new construction areas shall be to the satisfaction of the City. As discussed on page IV.G-17 of the Draft EIR, vegetated BMPs such as grassed swales, filter strips, and bioretention areas are effective at removing many pollutants of concern, including sediment and pollutants associated with sediment, as well as some dissolved constituents, such as dissolved copper and zinc. As the Draft EIR notes, vegetated BMPs would be implemented at the adjacent hillsides along the boundaries of the Project Site’s development areas. As further explained on page IV.G-19 of the Draft EIR, the proposed Project would include source controls such as street sweeping, public education, fines for littering, and storm drain stenciling catch basin inserts. These features are effective in reducing the amount of trash and debris that is available for mobilization during wet and dry weather events. Common area litter control would include a litter patrol, trash receptacles, and emptying of trash receptacles in a timely fashion. Further, in order to minimize the potential generation and transport of dissolved constituents, landscape watering in interment and garden areas under the proposed Project would use efficient irrigation technology to minimize excess watering. BMPs are also discussed on pages IV.G-11–IV.G-13 of the Draft EIR. The Draft EIR notes that the requirement to incorporate stormwater BMPs into the SUSMP is implemented through the City’s plan review and approval process. The Draft EIR concludes that Project impacts with respect to water quality would be less than significant, and mitigation would not be required. However, in addition to Mitigation Measure G-7 described above, 12 other mitigation measures are included in the Draft EIR (see Mitigation Measures G-1 through G-13 on pages IV.G-24 and IV.G-25 of the Draft EIR) to further reduce the Project’s less-than-significant impacts with respect to water quality. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment No. 87-15

C. River-related Aesthetic and Land Use Implications

We note that in general the DEIR and the Notice provide descriptions which significantly understate the project as it will be perceived by the public upon completion.

1. Visual From River. The DEIR correctly notes that most of the project will be visible from key vantage points in Griffith Park, but is incorrect in its statement that the project will have only limited visual impact when seen from Forest Lawn Drive and the River. It is obvious from the topographic maps provided, in the Notice and the DEIR that much of the project rises at elevations above the current cemetery. Although some will be hidden by intervening rises, these will not conceal the overall effect. What is now generally visible from viewpoints in Griffith Park and along Forest Lawn Drive will change dramatically from natural, verdant chaparral and riparian canyon to an extensive grassy area. In addition, the number and density of structures will be much greater than currently seen in Forest Lawn. The stated mitigation measure - - that this will happen in phases so to be less obvious - - simply implies that people “will get used to” the new vistas over time. This is not mitigation.\footnote{DEIR P. IV.A-40 [sic]}

Response to Comment No. 87-15

As explained on page IV.A-40 of the Draft EIR, the existing visual character of the Project Site is defined by both its location within the backdrop of the Santa Monica Mountains, and the built environment of the Forest Lawn Memorial-Park–Hollywood Hills property, which is defined by cemetery-related landscaped open space areas, structures and buildings. The Draft EIR explains that, in general, many of the existing and proposed ground elevations are obstructed from vantage points from the north by the area’s topography and existing vegetation. No ridgelines would be removed or modified as part of the proposed Project’s grading; new construction would be built into the hillside areas below ridgelines. As the Draft EIR explains on page IV.A-42, intermittent public vantages are available north of the Project Site (i.e., Buena Vista Park, Forest Lawn Drive, Buena Vista Street as it approaches the Project Site, a segment of West Alameda Avenue, the I-5 Freeway). The analysis in the Draft EIR also includes conceptual design views from these locations. The proposed Project would provide lawn and garden area landscaping consistent with the existing site development within the developable areas of the Project Site, and groundcover and habitat improvement within the undevelopable slope and drainage areas. In addition, approximately 75 acres of previously disturbed areas of the
Project Site would be included within the Project’s proposed grading. Thus, the proposed development would improve the existing visual character of some portions of the property by replacing several areas that are in intermittent states of grading and contain very little vegetation with extensive landscaping, cemetery related features, structures and site improvements that would be uniform and consistent with the historical and existing land uses on the Forest Lawn Memorial-Park–Hollywood Hills property. Thus, the Draft EIR concludes that impacts to visual character and viewsheds from vantage points north of the Project Site would be less than significant. Although impacts related to aesthetics are anticipated to be less than significant, the Draft EIR includes mitigation measures to further reduce the proposed Project’s less-than-significant impacts. Mitigation Measure A-3, set forth on page IV.A-45 of the Draft EIR, provides that natural features, such as prominent knolls or ridge lines, shall be preserved. Further, as the Draft EIR notes on page IV.E-16, in Section IV.E, Geology/Soils, there are no distinct and prominent geologic or topographic features that would be adversely affected by the Project. In addition, the statement in this comment that phasing of the Project is a mitigation measure is not correct. Phasing is not a mitigation measure for the Project.

**Comment No. 87-16**

2. **Loss of Riparian Habitat.** Royce Canyon and the upper segment of Sennett Creek, now one of the most dramatic riparian canyon ecosystems surviving in Los Angeles, will be severely truncated. In addition to the obvious visual impacts, particularly from Griffith Park and for hikers in the Griffith Park section of Royce Canyon, this has implications for the River and for River-related permits. Royce Canyon and upper Sennett Creek as these now exist will end abruptly at the Forest Lawn property line. Royce Canyon will be denuded. Sennett Creek will become essentially a drainage for the greatest part of the proposed expansion. These alterations in the natural ecosystem will significantly affect the existing natural control of runoff from this 700 acre drainage, and, as discussed above, require permit conditions and other mitigation. There is no currently proposed mitigation which will adequately address this.

**Response to Comment No. 87-16**

To clarify, the proposed Project does not propose to eliminate Sennett Creek, as the comment appears to suggest. Sennett Creek would be avoided by the proposed Project, with the exception of 0.05 acre of “waters” that would be affected by a proposed culvert crossing similar in design to existing road crossings, though the new crossing would be soft-bottomed to further reduce impacts. Forest Lawn has successfully restored a large portion of Sennett Creek within the Project Site over the past approximately 12 years, and additional restoration is proposed in connection with the Project, including the restoration of an acre of riparian habitat adjacent to Sennett Creek. (See Mitigation Measure C-5 on page IV.C-47 of the Draft EIR.) Further, the Project does not propose to denude Royce
Canyon. As noted above, Sennett Creek would be almost entirely avoided by the proposed Project, and Royce Canyon in Griffith Park is not part of the Project Site. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 87-17**

3. Consistency with the Los Angeles River Revitalization Master Plan. The DEIR cites the Los Angeles River Revitalization Master Plan (“LARRMP”), but then fails to include any detail about the plan in the vicinity of the project.\(^{45}\) The DEIR states that “the flood control improvements to the existing drainages...[would Improve] the flood control capability and ecological functioning of the Los Angeles River Flood Control Channel.”\(^{46}\) As pointed out above, this statement is not supported by analysis or data in the DEIR. Not only that, it may be just plain wrong. (We also suggest that the DEIR’s characterization of the River as the “Los Angeles River Flood Control Channel” is singularly inappropriate in light of the designation of the River as a water of the United States and the extensive work by local and state governments, and many others organizations to improve the River for public use.)

Based on these incorrect assumptions, the DEIR concludes that the project is consistent with the goals of the LARRMP, and that land use impacts of the project are less than significant. The LARRMP is quite specific about river recreational public use development in the vicinity of the project, identifying that general area as one of the primary “opportunity areas” for the River. Specifically, the LARRMP proposes the Spreading Grounds River Park as a significant element of the overall River Master Plan.\(^{47}\) The Spreading Grounds River Park would extend from Griffith Park along Forest Lawn Drive to the extent of the Forest Lawn property and the project. Most of the surface area of the current LADWP Headworks Project when completed will become a significant part of this park.

The proposed park would be adversely affected by the project because of (a) alteration of the view shed; (b) potential for adverse water discharges; and (c) increased traffic on Forest Lawn Drive. Thus, as presently proposed, the project is not consistent with the LARRMP.

\(^{45}\) DEIR P. I-70 [sic]  
\(^{46}\) Ibid [sic]  
\(^{47}\) Los Angeles River Revitalization Master Plan, City of Los Angeles, April 2007, P. 6-48 [sic]
Response to Comment No. 87-17

The Los Angeles River Revitalization Master Plan, which provides the overall vision for revitalization of the Los Angeles River, is discussed on pages IV.H-8 and IV.H-9 in Section IV.H, Land Use Planning, of the Draft EIR. As the Draft EIR notes, the Plan intends to revitalize the general environment of the Los Angeles River over the near-term planning period (5 to 20 years) and the long-term planning period (20 to 50 years) by providing improved natural habitat, economic values, water quality, recreation, and open space amenities. The Los Angeles River Revitalization Master Plan purposes include the provision of improved public access to the River and the encouragement of reinvestment in the surrounding urban system that would result in economic growth. The Los Angeles River Revitalization Master Plan is a visionary document intended to provide communities with an idea of what future choices may entail regarding changes in and near the Los Angeles River. It is not intended to dictate how this transformation will occur. This responsibility is delegated to the Community Plan jurisdictions and will take effect in part, with the establishment of the RIO District. The proposed RIO District does not include the Project Site.

As described in the City of Los Angeles' Los Angeles River Revitalization Master Plan, from Barham Boulevard to the confluence of the Los Angeles River with the Burbank Western Channel, the River is a concrete-lined rectangular channel approximately 130 feet wide. This area is known as Reach 5 in the Los Angeles River Revitalization Master Plan and is the area of the River to which the Project Site drains. The Project Site is not immediately adjacent to the Los Angeles River. Sennett Creek originates in the Royce Canyon area of Griffith Park, and it flows through Forest Lawn property to an adjacent property, owned by Junior Achievement of Southern California, Inc. Waters from Sennett Creek then enter three underground pipes, each approximately 60 inches in diameter, located underneath Forest Lawn Drive, a public street. On the other side of the public right-of-way, the waters pass through a concrete outfall structure located on what appears to be Los Angeles Department of Water and Power property, which is not publicly accessible and includes a high-voltage electrical tower, to an outlet into the concrete channel of the Los Angeles River.

Forest Lawn has successfully restored a large portion of Sennett Creek within the Project Site over the past approximately 12 years, and additional restoration is proposed in connection with the Project, including the restoration of an acre of riparian habitat adjacent to Sennett Creek. (See Mitigation Measure C-5 on page IV.C-47 of the Draft EIR.) Sennett Creek would be avoided by the proposed Project, with the exception of 0.05 acre of

48 City of Los Angeles, Los Angeles River Revitalization Master Plan, April 2007, pages 3-2 and 3-3.
“waters” that would be affected by a proposed culvert crossing similar in design to existing road crossings, though the new crossing would be soft-bottomed to further reduce impacts. The only other drainage on the Project Site that is directly tributary to the River is “Drainage L.” Drainage L is ephemeral in nature and only receives flows during storm events. All of “Drainage L” is heavily disturbed, and much of it flows on an old asphalt road. Drainage L conveys flows to the Los Angeles River through an existing 48-inch, reinforced-concrete pipe under Forest Lawn Drive. Drainage L is jurisdictionally disjunct and not continuous due to historic disturbance. Under the proposed Project, Drainage L would be enhanced, and Project mitigation includes the creation of an acre of riparian habitat along Drainage L. (See Mitigation Measure C-4 on pages IV.C-46 and IV.C-47 of the Draft EIR.)

The Los Angeles River Revitalization Master Plan identified 20 “Opportunity Areas” to demonstrate the diverse possibilities of a revitalized River. According to the Plan, the value of these areas is to serve as case studies or models that illustrate what might be feasible under alternative River improvement scenarios—some bold and some more restrained.49 The Spreading Grounds referenced in the comment is one of these Opportunity Areas. According to the Los Angeles River Revitalization Master Plan description of the Spreading Grounds Opportunity Area, “[t]hrough an expansion of the channel's width, removal of its concrete walls, extensive ecosystem restoration, and the creation of a large water quality and habitat area, the Spreading Grounds Opportunity Area could provide a major environmental benefit for the region.”50 The Plan notes that because the Los Angeles River Revitalization Master Plan is a visionary document, it is intended to give communities an idea of what future choices may entail regarding changes in and near the Los Angeles River; it is not intended to dictate how these areas will transform. Instead, it is the responsibility of the surrounding communities, through Community Plan updates and other established planning processes, to sort through the precise nature of land use changes and other River improvements, particularly what is wanted and needed in terms of community reinvestment.51 As explained above, the Project Site is not immediately adjacent to the River but is separated from it by Forest Lawn Drive and DWP property, and in some areas, i.e., where Sennett Creek leaves the Project Site, by Junior Achievement property as well.

The Project’s less-than-significant impacts with respect to viewsheds from northern vantage points are discussed in Response to Comment No. 87-15. The Project’s less-than-significant impacts with respect to water discharges are discussed in Response to Comment Nos. 87-12, 87-13, and 87-14. Please refer to Response to Comment

49 City of Los Angeles, Los Angeles River Revitalization Master Plan, April 2007, page 6-3.
50 Id., page 6-48.
51 Id., page 6-5.
Nos. 87-12 through 87-15 for additional information. With respect to traffic, no additional growth in trip generation beyond current levels is anticipated, based on the stability in the number of interments that have occurred at the Forest Lawn Memorial-Park–Hollywood Hills property over the last decade, and the Draft EIR concluded that no increase in trip generation, including with the Project, is anticipated. (See Section IV.J, Traffic, Circulation, and Parking, of the Draft EIR.)

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 87-18

D. Mitigating Measures

As noted above, the proposed mitigating measures are inadequate in many respects to address the volumes of water to be discharged to the River, water quality impacts on the River, and effects on riparian and other ecosystems which currently serve to control water flows. Mitigation measures for these are inadequate. At a minimum, the following additional mitigating measures should be considered:

1. Consider the preservation of Royce Canyon and upper Sennett Creek on the Forest Lawn property in their natural state. This would not have major impact on the number of additional grave sites, and would offer a huge public benefit. This should significantly reduce the amount of artificial mitigation, BMPs and other actions required to address drainage and pollution control issues. Consideration could be given to donating this acreage to Griffith Park, or, alternatively, providing continuity from the current Royce Canyon trail in Griffith Park onto this limited area of the Forest Lawn property.

Response to Comment No. 87-18

As explained in Response to Comment No. 87-16, the proposed Project does not propose to eliminate Sennett Creek or Royce Canyon. Sennett Creek would be avoided by the proposed Project, with the exception of 0.05 acre of “waters” that would be affected by a proposed culvert crossing similar in design to existing road crossings, though the new crossing would be soft-bottomed to further reduce impacts. Royce Canyon is not part of the Project Site. Forest Lawn has successfully restored a large portion of Sennett Creek within the Project Site over the past approximately 12 years, and additional restoration is proposed in connection with the Project, including the restoration of an acre of riparian habitat adjacent to Sennett Creek. (See Mitigation Measure C-5 on page IV.C-47 of the Draft EIR.) The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment No. 87-19

2. River Park Development as Mitigation. Part of the River area facing Forest Lawn is undergoing development by the Los Angeles Department of Water and Power as the Headworks Project. LADWP has committed to developing the surface of the area, once reservoir construction is completed, as parkland. While final plans for this apparently are not yet available, this would include trails and other amenities consistent with the Spreading Grounds Park (occupying this same area) discussed earlier. The following would greatly enhance this, and serve to mitigate some of the more difficult impacts from the proposed Forest Lawn Project.

   a. Provide continuity of riverside park from Griffith Park to the western edge of the Forest Lawn Property. From County records, the land between Forest Lawn Drive and the River appears to be owned by the Forest Lawn Company. This could be dedicated to river park use.

   b. Extend the bike path/promenade from Griffith Park and the Spreading Grounds Park along the full extent of the Forest Lawn Property, as part of an extended Spreading Grounds Park.

   c. Much of the mitigation will involve the replacement of trees in accordance with City of Los Angeles and California Department of Fish and Game requirements. This would be of limited or no value to the users of the new park areas along the River. Instead, focus the tree and other mitigation in the immediate vicinity of the project, not in other locations. This could consist of the trees and an additional mini-park facing on Forest Lawn, thus providing a shield from Forest Lawn Drive along the River and greatly enhancing the River experience.

3. If it is necessary to destroy substantial amounts of vegetation as proposed, some of the same experience could be recreated in a new park by establishing areas with concentrations of native vegetation, including oaks, sycamores and other large specimens which will be removed from the project site.

4. To further enhance the park experience, and to limit some of the discharge into the River and possibly mitigate some of the water quality impacts, Royce Creek should be redirected onto the Spreading Grounds Park rather than to its current discharge point into the River. Discharge could be spread out in the Park for watering and habitat creation/restoration.
Response to Comment No. 87-19

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Please refer to Response to Comment No. 87-17 for additional information.

Comment No. 87-20

5. As noted in part B, above, much more definitive BMPs must be developed for both construction and operation of the project, including the type of BMP to be employed, where these are to be located, and what the effect will be on discharges to the River.

Response to Comment No. 87-20

BMPs and discharges to the River are addressed in Response to Comment Nos. 87-10 through 87-14. Please refer to Response to Comment Nos. 87-10 through 87-14 for additional information. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 87-21

Finally, as provided in your Notice, we are requesting a public hearing as an opportunity to provide further public and agency input on the impacts of this project and as a means to better define appropriate mitigating measures.

We thank you for the opportunity to comment.

Response to Comment No. 87-21

The comment refers to the Army Corps’ publication of a Public Notice for the Project in connection with the Army Corps’ permitting process, which is separate from the requested City entitlements and environmental review of the Project under CEQA. With respect to the discretionary actions requested of the City, public hearings will be conducted by the City before any action on the Project. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.