APPENDIX E

CULTURAL RESOURCES IMPACT ANALYSIS
CULTURAL RESOURCES IMPACT ANALYSIS

GRIFFITH PARK CRYSTAL SPRINGS NEW BASEBALL FIELDS PROJECT

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Acronyms and Abbreviations

ADA  Americans with Disabilities Act of 1990
amsl  Above Mean Sea Level
APE  Area of Potential Effect
CCC  Civilian Conservation Corps
CCR  California Code of Regulations
CEQA  California Environmental Quality Act
CHL  California Historical Landmarks
City  City of Los Angeles
CRHR  California Register of Historical Resources
DEIR  Draft Environmental Impact Report
HCM  Los Angeles Historic-Cultural Monument
HRI  California State Historic Resources Inventory
I-5  Interstate 5
LADWP  Los Angeles Department of Water and Power
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Summary

The City of Los Angeles (City) is proposing to construct two youth baseball fields at one of three locations within Griffith Park. The purpose of this cultural resources impact analysis is to analyze the potential for project impacts related to cultural resources pursuant to the California Environmental Quality Act (CEQA).

After a review of plans and the state and City CEQA significance thresholds, the findings for each of the three alternatives are as follows:

Historic Resources

Alternative 1, Options A and B, would have a less-than-significant impact on historical resources. Alternative 2 has no impact on historical resources. No mitigation measures are necessary.

Archaeological Resources

No archaeological resources have been recorded on the sites for the project alternatives, and none were found during this investigation. The potential for archaeological resources to be found during construction is low, and any potential impacts would be mitigated through implementation of mitigation measure ARC-1.

Paleontological Resources

No paleontological resources have been recorded on the sites for the project alternatives, and none were found during this investigation. The potential for paleontological resources to be found during construction is low, and any potential impacts would be mitigated through implementation of mitigation measure PAL-1.
Introduction

The City of Los Angeles (City) is proposing the construction of two new youth baseball fields in one of three locations being considered within Griffith Park. An Initial Study was completed by the City in January 2013. The Initial Study concluded that additional technical studies and preparation of a Draft Environmental Impact Report (DEIR) be initiated. These studies are being prepared with the City of Los Angeles Bureau of Engineering as the Lead Agency under the California Environmental Quality Act (CEQA). The purpose of this cultural resources impact analysis is to analyze the potential for project impacts related to cultural resources, which includes historical resources, archaeological resources, and paleontological resources.

Project Location and Setting

Location

The proposed project would be located in the Hollywood community of the city of Los Angeles and entirely within Griffith Park. The park is located northwest of downtown Los Angeles, just west of the Golden State Freeway (Interstate 5 [I-5]), roughly between Los Feliz Boulevard on the south and the Ventura Freeway (State Route 134 [SR-134]) on the north (see Figure 1).

As shown in Figure 2, three locations are being considered for the proposed project. Alternative 1, Option A (Alternative 1A), would be located at 4730 Crystal Springs Drive, within the northeastern part of the Crystal Springs Picnic Area of the park. The Alternative 1A site, which covers approximately 4 acres, is northeast of Pote Field, south of Harding Municipal Golf Course, and west of I-5. Alternative 1, Option B (Alternative 1B), would also be located in the Crystal Springs Picnic Area but just southeast of Pote Field, on the grassy area across from the loop driveway and parking lot. Alternative 2 would be located in North Atwater Park, across from I-5 and the Los Angeles River.

Project Description

Alternatives

Two alternatives are being considered as part of this technical study. Alternative 1 would locate the proposed baseball fields within the Crystal Springs Picnic Area of the park and include two options (Option A and Option B) for placement of the fields. Alternative 2 would locate the baseball fields just across from I-5 and the Los Angeles River, within the North Atwater Park area of Griffith Park. The alternatives are described in more detail below.

Alternative 1, Option A – Crystal Springs North

The City is proposing to construct two youth baseball fields within the north Crystal Springs Picnic Area of Griffith Park. Each baseball field would include a home plate, bases, a pitcher’s mound, batters’ and catchers’ boxes, two dugouts (with two benches, approximately 20 seats each), two
Figure 1
Regional Location Map
Los Angeles Department of Public Works, Bureau of Engineering

Cultural Resources Impact Analysis
Griffith Park Crystal Springs New Baseball Fields Project

Figure 2
Project Location Map

Source: City of Los Angeles Bureau of Engineering, 2013.
bleachers, 16-foot-high outfield/perimeter fencing, natural grass, warm-up areas, and a scoreboard (refer to Figure 3 for the conceptual project layout under Alternative 1A). Landscaping and an irrigation system would also be installed. In addition, Alternative 1A would involve upgrades to the existing restroom facility. Restroom upgrades would be limited to interior remodeling and measures to increase access for those with disabilities.

Under this alternative, seven picnic tables would be relocated within or near the Crystal Springs Picnic Area. The northeast segment of the loop driveway, which currently supports vehicle circulation around the Crystal Springs Picnic Area, would be removed to accommodate the baseball fields (see Figure 3). As a result, five parking spaces would be removed and two “hammerhead” turning circles would be created, replacing the existing access loop.

**Alternative 1, Option B – Crystal Springs South**

The baseball fields proposed under Alternative 1B would include the same elements proposed under Alternative 1A. One baseball field would be located just southeast of Pote Field; the second would be located southeast of the first field, in the area across from the loop driveway and parking lot (see Figure 4). Alternative 1B would also involve upgrades to the existing restroom facility. Restroom upgrades would be limited to interior remodeling and measures to increase access for those with disabilities.

To accommodate this alternative, 56 picnic tables would be relocated within or near the Crystal Springs Picnic Area. No changes to existing circulation or parking are anticipated under this alternative.

**Alternative 2 – North Atwater Park**

Under Alternative 2, an existing softball field would be retrofitted to accommodate youth baseball and a new youth baseball field would be constructed (see Figure 5). The existing backstop, bleachers, and players’ benches would remain; the rest of the softball field would be upgraded. The new youth baseball field would be constructed just north of the existing softball field. The new bleachers, backstop, and players’ benches would match those of the existing field.

To accommodate this alternative, an existing basketball court and sand volleyball court would be removed. Unlike Alternative 1, Alternative 2 would not displace picnic tables, although new picnic tables would be added to the area as part of the project.

**Construction**

Construction is anticipated to begin in the summer of 2015 and be completed in the summer of 2016 (approximately 12 months). Post-construction activities (e.g., finalizing as-built plans, training the maintenance and operations staff regarding the use of the scoreboard, irrigation systems, security lights, and other systems) would occur in the fall and winter of 2016–2017. The baseball fields would be fully operational in the spring of 2017.

Currently, it is anticipated that Pote Field and a portion of the Crystal Springs Picnic Area would remain open during construction of Alternative 1. Under Alternative 2, a portion of the North Atwater Park area would also remain open during construction.
Figure 3
Alternative 1 Option A — Crystal Springs North

Source: City of Los Angeles Bureau of Engineering, 2013.
Figure 4
Alternative 1 Option B — Crystal Springs South

Source: City of Los Angeles Bureau of Engineering, 2013.
Los Angeles Department of Public Works, Bureau of Engineering

Cultural Resources Impact Analysis
Griffith Park Crystal Springs New Baseball Fields Project

Figure 5
Alternative 2 - North Atwater Park

Source: City of Los Angeles Bureau of Engineering, 2013.
The analysis in this document assumes that, unless otherwise stated, the project would be designed, constructed, and operated in compliance with all applicable laws, regulations, ordinances, and formally adopted City standards, including, but not limited to:

- Los Angeles Municipal Code
- Los Angeles Department of Building and Safety Code
- Bureau of Engineering Standard Plans
- Urban Forest Program/Tree Care Manual
- Standard Specifications for Public Works Construction
- Work Area Traffic Control Handbook
- Additions and Amendments to the Standard Specifications for Public Works Construction

**Historic Resources Regulatory Setting**

**California Environmental Quality Act**

According to CEQA Section 15064.5(a)(2), “a resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in a historical resource survey meeting the requirements of section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.”

Furthermore, a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment (CEQA Section 15054.5(b))

A substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired (CEQA Section 15064.5(b)(1)).

According to CEQA, the significance of a historical resource is materially impaired when a project:

- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the California Register of Historical Resources; or

- Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in a historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA. (CEQA Section 15064.5(b)(2)(A–C)).
California Register of Historical Resources

Griffith Park is a City of Los Angeles Historic-Cultural Monument (HCM). HCMs are automatically listed in the California Register of Historical Resources (Public Resources Code, Section 5024.1, Title 14 California Code of Regulations [CCR], Section 4852), the criteria of which are as follows:

(A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

(B) Is associated with the lives of persons important in our past;

(C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

(D) Has yielded, or may be likely to yield, information important in prehistory or history.

Historic-Cultural Monument Ordinance

Griffith Park is City of Los Angeles HCM #942, CHC No: CHC-2008-2724-HCM, CF No: 08-3086, adopted on January 27, 2009. The locations of Alternatives 1A, 1B, and 2, are all located within the HCM boundary of Griffith Park.

The Los Angeles Municipal and Administrative Codes address the preservation of historic and cultural monuments. A list of historical and cultural monuments has been compiled, which is maintained by the Cultural Heritage Commission: a board of five persons appointed by the mayor and approved by the City Council. It is the responsibility of the Cultural Heritage Commission to preserve monuments when such action is not in conflict with the public health, safety, and general welfare (Los Angeles Administrative Code Section 22.128).

According to Section 22.171.7 of the Los Angeles Municipal Code, a historical or cultural monument is any site (including significant trees or other plant life located thereon), building, or structure of particular historic or cultural significance to the city of Los Angeles in which:

1. the broad cultural, economic, or social history of the nation, state, or community is reflected or exemplified; or

2. which are identified with historic personages or with important events in the main currents of national, state, or local history; or

3. embody the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period, style, or method of construction; or

4. a notable work of a master builder, designer, or architect whose individual genius influenced his age.

The entirety of Griffith Park, is a historical resource and was found eligible as a City HCM under all four of the above-listed criteria.

The City of Los Angeles General Plan: Conservation Element

The City of Los Angeles General Plan Conservation Element addresses cultural and historical resources, stating, “The City has primary responsibility for identifying and protecting its cultural and historical heritage” (City of Los Angeles 2001). The City’s policy is to “continue to protect historic
and cultural sites and/or resources potentially affected by proposed land development, demolition or property modification activities” (City of Los Angeles, 2001). This policy is to be achieved through four programs:

- Program 1: development permit processing, monitoring, enforcement and periodic revision of regulations and procedures.
- Program 2: prepare the Historic Preservation and Cultural Resources Element of the General Plan.
- Program 3: continue to survey buildings and structures of any age in neighborhoods throughout the city in order to develop a record that can be used in the present and future for evaluating their historic and cultural value as individual structures and within the context of surrounding structures.
- Program 4: continue to establish Historical Preservation Overlay Zones throughout the city.

Local, Non-Adopted Plans

The Ralph Cornell 1939 Master Plan (not formally adopted). Because the federal Government required a Master Plan for further Civilian Conservation Corps (CCC) activities within Griffith Park, in 1938, the City hired Landscape Architect Ralph Cornell to draft a Griffith Park Master Plan. Cornell’s guidance was preliminary and general, but presented concepts that could be implemented by the City. The rugged, upper portions of Griffith Park were to not have vehicular traffic (Colonel Griffith himself wrote of this as well) and would remain somewhat, but not completely, inaccessible. Cornell advocated that Griffith Park’s lower-lying section be used for a variety of recreational facilities, to be clustered together if possible. These included picnic areas, golf, and the zoo, among other activities.

1978 Master Plan (not formally adopted). Immediately after the passage of Proposition 13, in November 1978, the City released a Draft Master Plan for Griffith Park, developed by SWA Associates. The 1978 Master Plan echoes many of the general concepts of the Cornell Plan, particularly an emphasis upon keeping the rugged, upper portions of Griffith Park open. Likewise, the lower portions of Griffith Park would incorporate recreational activities and the masses similar to other City parks. The 1978 Master Plan attempted to resolve damage to Griffith Park introduced by the freeways and the Toyon Landfill. Reclaimed land from the Los Angeles River flood plain would be used for various recreational activities that included sports fields and picnic areas, among other activities. Crystal Springs, Park Center, and the Old Zoo were collectively called “Park Center” and were part of the “Green Park Corridor” of lower lying riparian flat-scape. The plan encouraged “freeplay recreation” for Crystal Springs, and acknowledged both active and passive recreation within the expanded Park Center.

The 2013 Griffith Park Vision Plan (not formally adopted). This year (2013), the City of Los Angeles Department of Recreation and Parks released the draft “Vision Plan for Griffith Park: An Urban Wilderness Identity.” This document has not been formally adopted and is intended to serve as a guide for City decision making in Griffith Park until a full Master Plan is developed and adopted. The Vision Plan states that Griffith Park, as a whole, should retain an urban wilderness identity. The Vision Plan states that “there is a growing recognition that one of the Park’s greatest values for 21st century Los Angeles is its ability to reconnect people with the natural world.”
The Vision Plan calls out a variety of resources for their historic use, character, or significance. The resources that are called out include: Fern Dell, the Feliz Adobe, Municipal Plunge, the curb systems, the Griffith Observatory, the picnic grounds, the horse-keeping neighborhood of Atwater Village (located outside Griffith Park), Travel Town, the Walt Disney Barn, and the Greek Theater.

The Vision Plan includes the following goals and objectives that are specific to historical resources within Griffith Park:

- Page 5, Executive Summary, Section V (Desired Outcomes), Part B (one to five year goals), Item 4: “Begin restoration of degraded historical features.”
- Page 8, Chapter 1 (A Vision for Griffith Park) Section II (Specific Goals and Objectives), Part A (Manage the entirety of the Park consistent with the Park’s Urban Wilderness Identity), Item 3: “identify and preserve historic and cultural park resources.”
- Page 10, Chapter One (A Vision for Griffith Park) Section II. (Specific Goals and Objectives), Part E (Focus Park Management on the Urban Wilderness Identity and Improve Accountability and Effectiveness), Item 4: “Increase dedicated staff with special expertise on natural communities, historic and cultural resources, and resource management.”

Historical Resources Environmental Setting

Summary of Griffith Park History

On December 16, 1896, Colonel Griffith J. Griffith and his wife, Mary Agnes Christina Mesmer (Tina Griffith) donated to the City of Los Angeles what is presently the largest interurban wilderness park in the United States. This park was called Griffith Park and included 3,015 acres of rugged peaks, flatlands, and Los Angeles River-adjacent property. Colonel Griffith wrote extensively about his intentions for Griffith Park: to provide nature to all people free of charge as a remedy against increasing urbanization. Colonel Griffith made his donation in context with the philosophies of the City Beautiful Movement and an era increasingly critical of the industrial revolution’s side effects. In this context, Griffith Park’s nature and open space are historically significant. Hiking, picnicking, and equestrian activities are among the recreational activities that have been associated with Griffith Park from its beginning to the present day.

The Griffith Reservation and the Crystal Springs Picnic Area

When Colonel Griffith gifted the land and its water rights to the City, he set aside the “Griffith Reservation” for himself and his family. The Griffith Reservation included approximately 351 acres on which he resided until he passed away in 1919. At its southern tip, the Griffith Reservation included what is now the Crystal Springs Picnic Area (Figure 6). Flat topography and fertile land characterized this property that was adjacent to the Los Angeles River prior to its channelization, Riverside Drive, and the Interstate 5 and State Route 134 freeways.

The Griffith Reservation had a myriad of early uses that were different from the rest of Griffith Park; picnicking does not appear to have been one of the early uses of this area (Eberts, 1996:86). While Colonel Griffith resided on the property, much of its southern portions were leased for agricultural purposes to beet farmers and hay growers (Eberts, 1996:86; Pope, 1923).
Figure 6

Griffith Park Reservation Detail from 1897 Dockweiler Survey

(The location of the Crystal Springs picnic area is indicated. Crystal Springs is located on the Griffith Reservation, which was not part of the original Griffith Park land gift. Until 1921, the Crystal Springs picnic area was used for farming. Colonel Griffith had desired a man-made lake at this location.)
Reservation’s northern portions became an airfield for his son, Van, and the Riverside Municipal Golf Course, a nine-hole course of sand-covered links. The Riverside Municipal Golf Course was first developed in 1900 and refurbished in 1914.

According to his son, Colonel Griffith mentioned that he envisioned a man-made lake at the Reservation’s southern portion, which would be the present location of the Crystal Springs Picnic Area (Eberts, 1996:86). As the Parks Commission divested itself of water rights and control of the Los Angeles River front to the Los Angeles County Flood Control District, the option of damming the Los Angeles River to create a lake became infeasible.

According to his son, Colonel Griffith’s stated wish was that, after his passing, the Griffith Reservation would become part of Griffith Park, which occurred on May 9, 1921. By 1924, the City had both refined the Riverside Municipal Course—which was renamed in honor of President Harding—and added a second course, the Woodrow Wilson Municipal Golf Course. From 1921 through the early 1930s, holes 7, 8 and 9 of the Wilson Golf course were located in the area known today as the Crystal Springs Picnic Area (see Figure 7).

For reasons presently unknown, by the early 1930s, the City reconfigured the Wilson Course to remove the three links from the present Crystal Springs Picnic Area. By 1934, the area was the site of a CCC camp called Sb-21, Camp Griffith Park (Eberts, 1996:158). In May of 1936, the camp was disbanded and the present picnic grounds were developed. A 1947 map of Crystal Springs indicates the presence of multiple proposed baseball fields, close to those proposed in Alternatives 1A, 1B, and 2 (see Figure 8). However, this map appears to be a schematic only; the baseball diamond (Pote Field) is indicated but was not yet constructed, and there is no known record of other diamonds in the Crystal Springs Picnic Area. Pote Field and its nearby field house/comfort station and restroom were completed circa 1951, and the field was fully reconstructed in 1976. The tri-pad bench groupings were designed in 1984.

North Atwater Park Construction History

As originally surveyed by J.H. Dockweiler in 1897, certain portions of Colonel Griffith’s donation extended east beyond the Los Angeles River. The configuration and relationship changed when the Los Angeles River was channelized in the late 1930s. North Atwater Park is one of the smaller-scale portions of Griffith Park east of the Los Angeles River. Perhaps because of its hemmed-in location, North Atwater Park appears to have been fairly unimproved during Griffith Park’s early history, and all through Griffith Park’s period of significance, 1896–1958. The 1952 aerial imagery (Figure 9) shows what appears to be a restroom structure, sparse landscaping, plus flat, open space with some wear indicating what might have been a pick-up baseball field.

A 1971 Los Angeles Times article referred to the space as “vacant land,” and “a forlorn place with only a small baseball diamond.” (Boyarsky 1971:C1) Aerial imagery from 1972 indicates that the presence of landscaping, a new baseball field, and the still present circular-plan playground located at Griffith Park’s northern portion. The Alternative 2 area possesses no character-defining features or other elements that appear to date from Griffith Park’s period of significance, as defined in the City HCM application.
Figure 7

1931 Topographic Map Indicating the Location of the Crystal Springs Picnic Area

(In 1931, the Crystal Springs Picnic Area was part of the Wilson Municipal Golf Course)
Figure 8

1947 Recreation and Parks Schematic Map of Crystal Springs Picnic Area

(Pote Baseball Field would not be constructed until 1951. Though smaller baseball diamonds are indicated, they do not appear to have been constructed.)
Historical Resources Environmental Impact Analysis

Methodology

The methodology for this historic resources analysis included review of source materials, historical imagery, and a visit to each of the alternatives sites. An analytical review of both the City Municipal Archives and Recreation and Parks maps was conducted. In addition, items reviewed included multiple historic era maps of Griffith Park and the Crystal Springs Picnic Area, Parks Commission minutes and correspondence, tract maps, site and landscape plans, and topographic maps. Historic-era imagery was reviewed. A site visit to all three potential alternative sites was conducted on August 30, 2013.
Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines and *L.A. CEQA Threshold Guide* (2006), the project alternatives would have a significant environmental impact under CEQA related to historical resources if it would:

1. Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.

According to the L.A. CEQA Thresholds Guide, a substantial adverse change in significance occurs if the project involves:

1. Demolition of a significant resource; or
2. Relocation that does not maintain the integrity and significance of a significant resource; or
3. Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or
4. Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

Section 15064.5(b) goes on to define “substantial adverse change,” in relevant part, as follows:

1. Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.

2. The significance of an historical resource is materially impaired when a project:
   A. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the CRHR; or
   B. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register or historic resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in a historic resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically significant; or
   C. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR as determined by a lead agency for the purposes of CEQA.

3. Generally, a project that follows the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines of Preserving, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Weeks and Grimmer 1995), shall be considered as mitigated to a level of less than a significant impact on the historical resource.

4. A lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of a historical resource. The lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, and other measures.
Construction Impacts

Alternative 1

Alternative 1 encompasses two options for two new baseball fields in the Crystal Springs Picnic Area of Griffith Park. Aside from the youth baseball fields, other proposed construction includes two dugouts at each baseball field with two benches of approximately 20 seats each, two bleachers, 16-feet-high outfield/perimeter fencing, warm-up areas, natural grass, and scoreboard.

Option A

Alternative 1 Option A necessitates construction activities that would alter the physical landscape of the North Crystal Springs area. Re-grading will be a major component of the proposed project and re-grading necessitates the removal of mature trees, lawn space, and picnic benches. The picnic area space and the pre-1959 resources within it date from Griffith Park's period of significance, which ends in 1958. Mature trees are a significant landscape feature of the project area, though it is uncertain which trees date from the period of significance. The space itself, as an open picnic area, is a character-defining feature of Griffith Park. This proposed construction would alter the setting, design, and feeling of the Crystal Springs Picnic Area.

The proposed construction under Alternative 1A would result in a less-than-significant impact on the historical resource, which is Griffith Park. The proposed construction at the Crystal Springs Picnic Area does not appear to be a substantial change such that it would cause Griffith Park to lose its historic integrity, rendering the property ineligible as a locally listed and CRHR-listed historical resource. Although character-defining features would be altered and lost, Griffith Park would retain the physical characteristics that convey its historical significance and justify its inclusion as a City HCM and California Register of Historical Resources-listed property.

Option B

The impacts from construction of Alternative 1B would be similar to those from Alternative 1A. Therefore, impacts would be less than significant.

Alternative 2

Alternative 2 necessitates construction activities that would alter the physical landscape of North Atwater Park. North Atwater Park was redeveloped in the early 1970s and none of the trees appears to date from the period of significance for Griffith Park, which ends in 1958. Because North Atwater Park was developed 13 years after Griffith Park's period of significance, the proposed construction activities would have no impact upon Griffith Park as a historical resource.

The proposed construction at North Atwater Park area does not appear to be a substantial change in that it would cause Griffith Park to lose its historic integrity, rendering the property ineligible as a locally listed and CRHR-listed historical resource. No character-defining features would be altered and lost. Griffith Park would retain the physical characteristics that convey its historical significance and justify its inclusion as a City HCM and California Register of Historical Resources-listed property.
**Operational Impacts**

**Alternative 1, Option A**

The Alternative 1A baseball fields would be active recreation facilities used for youth baseball games. It is assumed that on game days much of the nearby remaining open space, depending on the amount of teams playing on a given day, would be used for warm-up and social activities associated with the game, rather than solely for picnicking.

Crystal Springs has not been a picnic area throughout the entirety of Griffith Park’s history. Even after it became a picnic area, early on, a degree of active recreation began to occur in the area. A 1947 map actually depicts proposed baseball fields at locations similar to both of the proposed Alternative 1 options. During the period of significance, other facilities that developed in the Crystal Springs Picnic Area that were not considered to be passive recreation include baseball (Pote Field), agricultural education (the Pettigrew complex), and hobbyist activities (a model airplane field was located at the eastern portion of the picnic area during the post-war era).

According to the recently released 2013 Griffith Park Vision Plan, the Crystal Springs Picnic Area, a permit picnic area, is unique for it is the only picnic area in Griffith Park that can be reserved for groups. On page 13, the Vision Plan states:

> The term “picnicking” is elastic in this context. While social celebrations and company gatherings are held at Crystal Springs, large public events such as cooking expositions and health and fitness jamborees – often requiring signage, stages, canopies and booths – are also held there. Paid monitoring by Park Rangers is mandated for events exceeding 300 persons or serving alcohol, and organizers are sometimes required to hire maintenance personnel for post-picnic cleanup. Because the area is adjacent to other public uses, the impact a group event will have on neighboring recreational users and the Park itself is taken into account in the awarding of permits. The fees charged for permits are determined by the number of persons (up to 800), number and type of temporary structures, and use of electricity and personnel from the Department of Recreation and Parks.

Throughout most of its history and at the present time, the Crystal Springs Picnic Area has integrated and adapted to a variety of uses that are not typically defined as passive recreation. Despite its range of uses, the loss of the picnic area under Alternative 1 (both options) would be a permanent change that would change the current passive use in that area.

Although youth baseball fields would present a change in use for the picnic area to active recreation, in the context of Griffith Park as a whole as a listed historical resource, the proposed change in operational use would be a less-than-significant impact. The proposed operational changes to the Crystal Springs Picnic Area would not result in a substantial adverse change to Griffith Park. Griffith Park would not lose its historic integrity, and become ineligible as a locally listed and CRHR-listed historical resource. Although character-defining features of Griffith Park would be altered and lost, Griffith Park would retain the physical characteristics that convey its historical significance and justify its inclusion as a City HCM and California Register of Historical Resources listed property.

The operational impacts of Alternative 1B would be similar to those of Alternative 1A. Therefore, impacts would be less than significant.
Alternative 2

The proposed baseball fields in North Atwater Park would be used for youth baseball games. It is assumed that on game days much of the nearby remaining open space, depending on the amount of playing teams on a given day, would be used for warm-up and social activities associated with the game. Since approximately 1971, when North Atwater Park was redeveloped, it has been primarily used for various active recreation and competitive team sport activities similar in manner to the proposed baseball fields. Therefore, the proposed operational use would have no impact upon Griffith Park as a historical resource.

Historical Resources Mitigation Measures

Because none of the proposed alternatives would result in significant impacts to Griffith Park as a historical resource, no mitigation measures are required.

Historical Resources Significant Unavoidable Impacts

No significant unavoidable impacts to Griffith Park as a historical resource would occur.

Historical Resources Cumulative Impacts

The study area for cumulative impacts for built environment historical resources is defined as the entirety of all property within the present boundary of Griffith Park except for the Interstate 5 and State Route 134 rights-of-way; all parcels that touch the Griffith Park boundary, and the Los Angeles River as it parallels Griffith Park from the Los Angeles Department of Water and Power’s Headworks site at the north to the point perpendicular to the intersection of the Interstate 5 and Glendale Boulevard off-ramp and Riverside Drive at the south. Within this area, construction activities associated with the alternatives could substantially alter or destroy built resources that may exist in the project area, and thereby contribute to the progressive loss of historical resources.

According to CEQA Guidelines Section 15065(a)(3), a lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where there is substantial evidence, in light of the whole record, that any of the following conditions may occur:

The project has possible environmental effects that are individually limited but cumulatively considerable. “Cumulatively considerable” means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

In the late 1950s, Griffith Park saw a substantial loss of picnic areas and other passive recreational resources, due primarily to the construction of the Interstate 5 and the State Route 134 freeways through its flatlands. According to Parks Superintendent George Hjelte, approximately 175 acres of flatland areas of Griffith Park were lost due to freeway development (Los Angeles Times 1954:17). The specific loss to designated picnic areas was primarily concentrated around the Pecan Grove Picnic Area.
This analysis uses Griffith Park’s 2009 HCM listing as a baseline to determine its historic integrity. The loss of historic integrity from construction of Interstate 5 and State Route 134, as well as the development of the Toyon Landfill was not substantial, as it would not deny Griffith Park, as a whole, its eligibility as a City HCM.

At present, there are three projects within the vicinity of the proposed alternatives and the Area of Potential Effect (APE): the North Atwater Crossing (also known as the North Atwater Multi-Modal Bridge over the Los Angeles River) project; the performing arts center project, located near the Old Los Angeles Zoo; and the North East Interceptor Sewer (NEIS) Phase 2A project.

The North Atwater Multi-Modal Bridge would connect equestrians, bicyclists, and pedestrians from an area at the southern tip of North Atwater Park to a tunnel at the west bank of the Los Angeles River that crosses under the Interstate 5 freeway and leads into Griffith Park. The tunnel provides access to an equestrian path adjacent to the Crystal Springs Picnic Area.

The introduction of the North Atwater Multi-Modal Bridge, combined with the less-than-significant impact of the proposed alternatives would not result in cumulatively considerable impacts upon Griffith Park as a historical resource. The North Atwater Multi-Modal Bridge would connect to the south sliver of North Atwater Park. Although North Atwater Park still has a historic connection to Griffith Park, it contains no historic materials or features from the period of significance.

The first phase of the performing arts center project proposes placing existing overhead power lines underground; the refurbishment and ADA compliance of an extant restroom building; the construction of a 45-foot by 45-foot concrete stage; the construction of an ADA viewing pad and walkway; perimeter and security lighting; and two new ADA parking stalls. Construction would begin November 2013 and end in May 2014.

The second phase of the performing arts center project proposes the resurface and re-stripping of an existing parking lot; the resurfacing of walking paths, installation of approximately 120-foot long steel bridge from parking lot for ADA access; perimeter and security lighting; instillation of regarded path to Upper Old Zoo to meet 8.33 percent maximum slope for ADA access. Construction would begin November 2014 and continue through May 2015.

In the 2009 HCM, the Old Zoo was recognized as a historically sensitive resource within Griffith Park. An environmental study has not yet been completed for the proposed performing arts center project and, therefore, impacts to historic resources and significant character-defining features have not been formally evaluated. This includes an analysis of the Old Zoo and its adjacent landscape as a potentially eligible individually listed City HCM. The impact of the performing arts center project is currently unknown. Nonetheless, the proposed project alternatives’ contribution to this unknown impact would not result in a cumulatively considerable contribution to a significant cumulative impact.

The NEIS Phase 2A project is currently the northern extension of the NEIS Phase 1 project. The project will construct approximately 3.03 miles of 8-foot-diameter sewer in tunnel and associated structures. The sewer will be constructed from the Division Street shaft site, near the intersection of San Fernando Road and Cazador Street, and terminate at the northern overflow parking lot for the pony and train rides in Griffith Park, just north of the I-5 Griffith Park on and off ramps (I-5 shaft site) and east of Crystal Springs Drive. In addition, this project will also construct approximately 0.76 mile of 7-foot-diameter sewer in tunnel and associated structures. This 7-foot-diameter sewer...
has been called the NOS Extension. The sewer extends from the I-5 shaft site to the Recreation and Parks Central Yard, which is south of the L.A. Glendale Water Reclamation Plant (LAGWRP), and connects to the existing North Outfall Sewer (NOS) near Baywood Street.

The NEIS Phase 2A project would dig a trench for the new sewer infrastructure and then cover it, without making changes to the characteristics that make Griffith Park a historical resource. The NEIS Phase 2A project, combined with the less-than-significant impact of the proposed alternatives, would not result in cumulatively considerable impacts on Griffith Park as a historical resource.

In addition to the above-mentioned projects, an additional project, the Headworks Restoration Project, is located within the Griffith Park HCM boundaries. The Headworks has long been a disturbed but largely unimproved field. Historically, this site's primary function is to support water infrastructure and provide spreading grounds. Though the Headworks site is located within the Griffith Park boundary, its historic use as park or recreational land is secondary to its function as water infrastructure. Upon the 43-acre Headworks site, the City of Los Angeles Department of Water and Power (LADWP) is proposing to construct the following:

- two buried concrete reservoirs with a 54 and 56 million gallon storage capacities, covered with two to three feet of soil and native vegetation;
- a 4-megawatt hydroelectric power plant;
- a flow regulating station with a flow capacity of 250 cubic feet per second;
- a, 96 inches in diameter, 6600 feet long trunk line with a 3000-foot tunneling portion; and,
- a Los Angeles River Ecosystem Restoration project, in partnership with the U.S. Army Corps of Engineers.

The Headworks Restoration Project combined with the less-than-significant impact of the proposed alternatives would not result in cumulatively significant impacts upon Griffith Park as a historical resource. Furthermore, the proposed project alternatives would not result in a cumulatively considerable contribution to a significant cumulative impact when considering the combination of the Headworks Restoration Project, the North Atwater Multi-Modal Bridge, the performing arts center projects, and the proposed project alternatives.
Archaeological Resources Regulatory Setting

State

California Environmental Quality Act

Development of the proposed project is governed by CEQA. In accordance with Section 21084.1 of CEQA, the proposed project would have a significant adverse environmental impact if it causes a substantial or potentially substantial adverse change in the significance of a historical resource.

As defined under state law in Title 14 CCR Section 4850, the term “historical resource” means “any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or which is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural history of California.” For the purposes of CEQA, “historical resource” is further defined under Public Resources Code Section 15064.5 as a “resource listed in, or determined eligible for listing in the California Register.”

Section 15064.5 of the State CEQA Guidelines sets forth the criteria and procedures for determining significant historical resources and the potential effects of a project on such resources. Generally, a cultural resource shall be considered by the lead state agency to be “historically significant” if the resource meets any of the following criteria for listing on the California Register:

- the resource is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage; or
- the resource is associated with the lives of persons important in our past; or
- the resource embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of an important creative individual or possesses high artistic values; or
- the resource has yielded, or may be likely to yield, information important in prehistory or history.

The cited statutes and guidelines specify how cultural resources are to be managed in the context of projects such as the proposed project. Briefly, archival and field surveys must be conducted, and identified cultural resources must be inventoried and evaluated in prescribed ways. Prehistoric and historical resources deemed “historically significant” must be considered in project planning and development.

California Health and Safety Code

Human remains are also sometimes associated with archaeological sites. According to CEQA, “archaeological sites known to contain human remains shall be treated in accordance with the provisions of State Health and Safety Code Section 7050.5.” The protection of human remains is also ensured by California Public Resources Codes, Sections 5097.94, 5097.98, and 5097.99.
If human remains are exposed during construction, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code 5097.98. Construction must halt in the area of the discovery of human remains, the project proponent must assure that the area is protected, and consultation and treatment shall occur as prescribed by law.

Local

The City of Los Angeles General Plan: Conservation Element

The Conservation Element of the City of Los Angeles General Plan (adopted September 2001) specifically addresses archaeological resources in Section 3 of Chapter 2. The Conservation Element’s archaeological objective is to “protect the city’s archaeological and paleontological resources for historical, cultural, research and/or educational purposes.” Moreover, its policy is to “continue to identify and protect significant archaeological and paleontological sites and/or resources known to exist or that are identified during land development, demolition or property modification activities.”

Archaeological Resources Environmental Setting

The project area is located within the Los Angeles Basin, a broad, level expanse of land comprising more than 800 square miles, with elevations approximately 500 feet above mean sea level (amsl). The Los Angeles Basin is traversed by several large watercourses, most notably the Los Angeles River which flows adjacent to the project alternatives. The Los Angeles River originates to the north in the San Fernando Valley north of the project area. Adjacent to the Project area, the Los Angeles River flows through a gap between the Hollywood Hills and the Verdugo Hills, known as the Narrows. South of the Narrows, the topography flattens, allowing the Los Angeles River floodplain to broaden across a wide expanse in the area of downtown Los Angeles.

Cultural Setting

The general prehistoric, ethnographic, and historical background provided below applies to the Los Angeles region, including the specific project alternative locations. The specific historical background of the project alternative locations is provided above, in the “Historical Resources” section.

Prehistoric Background

The prehistoric occupation of southern California is divided chronologically into four temporal phases or horizons (Moratto 1984). Horizon I, or the Early Man Horizon, began at the first appearance of people in the region (approximately 12,000 years ago) and continued until about 7000 B.P. Although little is known about these people, it is assumed that they were semi-nomadic and subsisted primarily on game.

Horizon II, also known as the Millingstone Horizon or Encinitas Tradition, began around 5000 B.C. and continued until about 3500 B.P. The Millingstone Horizon is characterized by widespread use of milling stones (manos and metates), core tools, and few projectile points or bone and shell artifacts. This horizon appears to represent a diversification of subsistence activities and a more sedentary settlement pattern. Archaeological evidence suggests that hunting became less important and that reliance on collecting shellfish and vegetal resources increased (Moratto 1984).
Horizon III, the Intermediate Horizon or Campbell Tradition, began around 3500 B.P. and continued until about A.D. 600–800. Horizon III is defined by a shift from the use of milling stones to increased use of mortar and pestle, possibly indicating a greater reliance on acorns as a food source. Projectile points become more abundant and, together with faunal remains, indicate increased use of both land and sea mammals (Moratto 1984).

Horizon IV, the Late Horizon, which began around A.D. 600–800 and terminated with the arrival of Europeans, is characterized by dense populations; diversified hunting and gathering subsistence strategies, including intensive fishing and sea mammal hunting; extensive trade networks; use of the bow and arrow; and a general cultural elaboration (Moratto 1984).

Ethnographic Background

The project area lies within the territory of the Gabrielino Native American people (Bean and Smith 1978). The Gabrielino are characterized as one of the most complex societies in native southern California, second perhaps only to the Chumash, their coastal neighbors to the northwest. This complexity derives from their overall economic, ritual, and social organization (Bean and Smith 1978:538; Kroeber 1925:621).

The Gabrielino, a Uto-Aztecan (or Shoshonean) group, may have entered the Los Angeles Basin as recently as 1500 B.P. In early protohistoric times, the Gabrielino occupied a large territory, including the entire Los Angeles Basin, parts of the Santa Monica Mountains, the San Fernando Valley, the San Gabriel Valley, the San Bernardino Valley, the northern parts of the Santa Ana Mountains, and much of the middle to the lower Santa Ana River. They also occupied the islands of Santa Catalina, San Clemente, and San Nicolas. Within this large territory were more than 50 residential communities with populations ranging from 50 to 150 individuals. The Gabrielino had access to a broad and diverse resource base. This wealth of resources, coupled with an effective subsistence technology, well developed trade network, and ritual system, resulted in a society that was among one of the most materially wealthy and culturally sophisticated cultural groups in California at the time of contact (Bean and Smith 1978).

Historic Background

Spanish occupation of California began in 1769, at San Diego. Thereafter, the Mission San Gabriel was established in the Los Angeles Basin in 1771 and the Los Angeles Pueblo was established as a civilian settlement on September 4, 1781. The Los Angeles Pueblo, the first beginnings of the city of Los Angeles, was created at the behest of the Spanish royal governor of California. Eleven families, a total of 44 people, recruited as colonists from Sinaloa, Mexico, founded the village of Nuestra Señora de la Reina de Los Angeles de Porciúncula on September 4, 1781. The first structures there, built in the fall of 1781, were described as “a dozen or so adobe structures surrounded by wooden palisades” (Dillon 1994). The village also included a military guard of four soldiers (Dillon 1994). The early economy of the Pueblo of Los Angeles focused on cattle ranching. However, the Pueblo also produced grain.

By 1800, the village consisted of 30 adobe structures surrounding a central Plaza, including a town hall, barracks, bodege (storehouse), and a calabozo (jail). The community was then in turn, surrounded by an adobe wall (Dillon 1994). This original Plaza was moved after flooding in 1800 or 1815 (Gumprecht 2001). Seeking higher ground, the Plaza was relocated uphill to Olvera Street, originally named Calle de Vino or Wine Street. Flooding during this time not only washed away
buildings, but also resulted in the deposition of large amounts of new sediment, changing the course of
the Los Angeles River. The Los Angeles River sometimes shifted so often that it “could be witnessed on
a smaller scale, even during the dry season, in the river’s wide bed near downtown, where the river’s
water, laden with sediments, was carried by numerous intertwining, ever shifting, small channels,
meandering, back and forth across its sandy beach” (Gumprecht 2001:149; Gumprecht 1999). As a
result of flooding and changes in the Los Angeles River course, the village of Los Angeles thereafter
may have moved as many as four times before settling at its present location, preserved as a California
State Historic Park on the west side of modern Alameda Street (Dillon 1994).

Political change soon reached the remote village of Los Angeles. In 1823, Mexico gained independence
from Spain and took control of California. Initially, Mexican immigration to California was small but
this all changed when, in 1833, Mexico secularized the missions, absorbed their holdings, and then
began a redistribution of lands. Between 1835 and 1845, almost 700 land grants were made by the
new nation, many of which were fertile, former mission lands (JRP and Caltrans 2000:11). Ranchos
surrounding the Los Angeles Pueblo included the Rancho de Los Felis, San Raphael, and San Antonio.

Cattle ranching came to overshadow the agricultural economy in the region during the Mexican
Period, and industries and trade grew around this shift. San Pedro, south of Los Angeles, became a
major port for export of tallow and hides to Boston and Europe. On April 4, 1850, Los Angeles was
incorporated as a municipality. The city developed gradually in the nineteenth century, then
expanded remarkably during boom times in the 1880s. Population of the city reached 50,400 in
1890, and 102,479 by 1900.

The history of Los Angeles through most of the twentieth century is one of remarkable urban
growth. The population grew to 319,200 by 1910. After the construction and opening of the Los
Angeles Aqueduct in 1913, farming expanded to include irrigated crops and orchards. Independent
Valley towns gradually voted for annexation to the City with the benefit being connected to the
municipal water system. Rural areas were annexed by Los Angeles in 1915, more than doubling the
size of the City. In the mid-20th century, population growth pushed urbanization into the San
Fernando Valley. By 1960, the city had a population of 2.4 million.

Archaeological Resources Environmental Impact Analysis

Methodology

A literature and records search was conducted on August 1, 2013, at the South Central Coastal
Information Center located at California State University, Fullerton. The search included a review of
all available cultural resource reports and archaeological site records within a 1/2 mile radius of the
project area. In addition, the California Points of Historical Interest (PHI), the California Historical
Landmarks (CHL), the California Register of Historical Resources (CRHR), the National Register of
Historic Places (NRHP), the California State Historic Resources Inventory (HRI), and the City HCM
databases were reviewed.

This record search revealed that the project area had not been previously surveyed, except as part of
general surveys of Griffith Park. No archaeological resources have been recorded within the project area.
A pedestrian survey of both the Crystal Springs location and the North Atwater Park location was conducted on August 6, 2013. The survey was conducted at fifteen meter intervals, with special attention paid to areas of bare soil or thin grass, such as under trees, rodent burrows, and in areas of dead grass. Since the locations are largely covered in grass, surface visibility was very poor. No archaeological resources were identified.

Thresholds of Significance

For the purposes of this analysis, in accordance with Appendix G of the State CEQA Guidelines, the project alternatives would have a significant environmental impact on archaeological resources if they would:

1. Cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5; or
2. Disturb human remains, including those interred outside of formal cemeteries.

In addition, the L.A. CEQA Thresholds Guide (2006) goes further to state that a project would normally have a significant impact upon archaeological resources if it could disturb, damage, or degrade an archaeological resource or its setting that is found to be important under the criteria of CEQA because it:

1. Is associated with an event or person of recognized importance in California or American prehistory or of recognized scientific importance in prehistory;
2. Can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archaeological research questions;
3. Has a special or particular quality, such as the oldest, best, largest, or last surviving example of its kind;
4. Is at least 100-years-old and possesses substantial stratigraphic integrity; or
5. Involves important research questions that historical research has shown can be answered only with archaeological methods.

Construction Impacts

Alternative 1

Alternative 1 encompasses two options for two new baseball fields in the Crystal Springs Picnic Area of Griffith Park.

Option A

Alternative 1, Option A would require construction activities that would include limited amounts of ground disturbance. These may include grading and leveling, and utility trenching associated with replacing or upgrading electrical and plumbing systems and drainage elements. These activities are

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1 Although the CEQA criteria state that “important archaeological resources” are those which are at least 100-years-old, the California Register provides that any site found eligible for nomination to the National Register will automatically be included within the California Register and subject to all protections thereof. The National Register requires that a site or structure be at least 50-years-old.
likely to be shallow in depth, and overall, the potential for encountering buried archaeological resources is considered to be low. However, trenching excavations could encounter significant archaeological resources. Disturbance of significant archaeological resources, if any were encountered, would result in a significant impact prior to implementation of Mitigation Measure ARC-1.

With respect to human remains, if any are discovered, State Health and Safety Code Section 7050.5 states that further disturbances and activities shall cease in any area or nearby area suspected to overlie remains, and the County Coroner contacted. Pursuant to Public Resources Code Section 5097.98, if the remains are thought to be Native American, the coroner shall notify the NAHC, who shall then notify the Most Likely Descendent (MLD). Further provisions of Public Resources Code Section 5097.98 are to be followed as applicable. Therefore, by complying with existing regulations, impacts related to human remains would be less than significant.

**Option B**

Alternative 1, Option B would require similar construction activities as Alternative 1, Option A, and these activities would have similar impacts. Disturbance of significant archaeological resources, if any were encountered, would result in a significant impact prior to implementation of Mitigation Measure ARC-1.

Similar to Alternative 1, Option A, by complying with existing regulations, impacts related to human remains under construction of Alternative 1, Option B would be less than significant.

**Alternative 2**

Alternative 2 would require similar construction activities as Alternative 1, Options A and B, and these activities would have similar impacts. Disturbance of significant archaeological resources, if any were encountered, would result in a significant impact prior to implementation of Mitigation Measure ARC-1.

Similar to Alternative 1, Options A and B, by complying with existing regulations, impacts related to human remains under construction of Alternative 2 would be less than significant.

**Operational Impacts**

**Alternative 1**

**Option A**

No earthmoving activities would occur during the operational phase of the project. Therefore, operation of Alternative 1A would not result in impacts to archaeological resources.

**Option B**

No earthmoving activities would occur during the operational phase of the project. Therefore, operation of Alternative 1B would not result in impacts to archaeological resources.

**Alternative 2**

No earthmoving activities would occur during the operational phase of the project. Therefore, operation of Alternative 2 would not result in impacts to archaeological resources.
Archaeological Resources Mitigation Measures

Alternative 1, Options A and B, and Alternative 2

**ARC-1**: A qualified professional archaeologist shall monitor all initial phases of ground-disturbing activities of the project. If buried cultural resources — such as flaked or ground stone, historic debris, building foundations, or non-human bone — are discovered during ground-disturbing activities, work shall stop in that area and within 50 feet of the find until a qualified archaeologist can assess the significance of the find and, if necessary, develop appropriate treatment measures. Treatment measures typically include: development of avoidance strategies, capping with fill material, or mitigation of impacts through data recovery programs such as excavation or detailed documentation. A report of findings shall be prepared, and recovered materials curated, if needed, in an approved facility. If during cultural resources monitoring the qualified archaeologist determines that the sediments being excavated are previously disturbed by construction or are unlikely to contain significant cultural materials, the qualified archaeologist can specify that monitoring be reduced or eliminated.

Archaeological Resources Significant Unavoidable Impacts

Mitigation Measure ARC-1 would reduce the archaeological resources impact to a less-than-significant level. Therefore, no significant unavoidable adverse impacts to archaeological resources would occur.

Archaeological Resources Cumulative Impacts

The study area for cumulative impacts to archaeological resources is defined for this project as the Griffith Park and Los Angeles River Narrows areas of Los Angeles, an area of the city developed in the late nineteenth century and early twentieth century. In this area, construction activities associated with the alternatives could disturb or destroy archaeological resources that may exist in the project area, and thereby contribute to the progressive loss of prehistoric or historical archaeological resources. However, it is unknown if significant resources exist in these areas.

It should be noted that a great deal of historical period debris can be found during construction—items such as bricks, bottles, broken cups and plates—and that this material is seldom a significant resource, eligible for the California Register. The potential for an individual project to affect significant cultural resources is unknown, but given the number of projects, it is probable that cumulative growth and development in the Griffith Park and Los Angeles River Narrows areas of Los Angeles could have impacts on significant prehistoric or historical archaeological resources.

Nonetheless, the proposed project’s alternatives would not contribute to a cumulative impact related to archaeological resources. Mitigation Measure ARC-1 would reduce potential project-related impacts. This mitigation measure includes monitoring, treatment of any discovered cultural resources to mitigate impacts, preparation of a final report and curation of discovered materials in an approved facility. The incremental effects of the proposed project, after mitigation, would not
contribute to a significant adverse cumulative impact to archaeological resources. With mitigation, all project-related impacts would be reduced to a less-than-significant level; therefore, the build alternatives’ contribution to significant cumulative impacts would be rendered less than cumulatively considerable.
Paleontological Resources Regulatory Setting

State

California Environmental Quality Act

In the State of California, fossil remains are considered to be limited, nonrenewable, and sensitive scientific resources. These resources are afforded protection under CEQA. Paleontological resources are provided protection as historical resources, as discussed in State CEQA Guidelines Section 15064.5(a)(3). The State CEQA Guidelines define historical resources broadly to include any object, site, area, or place that a lead agency determines to be historically significant.

Local

City of Los Angeles General Plan: Conservation Element

The Conservation Element of the City of Los Angeles General Plan (adopted September 2001) specifically addresses paleontological resources in Section 3 of Chapter 2. The Conservation Element’s paleontological objective is to “protect the city’s archaeological and paleontological resources for historical, cultural, research and/or educational purposes.” Moreover, its policy is to “continue to identify and protect significant archaeological and paleontological sites and/or resources known to exist or that are identified during land development, demolition or property modification activities.”

Additionally, the City of Los Angeles has adopted as the City’s CEQA Guidelines (2002) “all of the State CEQA Guidelines contained in Title 15, California Code of Regulations, Sections 15000 et seq., and incorporates all future amendments and additions to those guidelines as may from time to time be adopted by the State.”

Paleontological Resources Environmental Setting

Surface deposits in the project area are mapped as younger Quaternary alluvium (Dibblee and Ehrenspeck 1989), consisting of floodplain deposits from the Los Angeles River. These are silt, sand, and gravel deposits of Holocene age (10,000 years Before Present [BP] to Recent). Because of proximity to the Los Angeles River, the younger Quaternary alluvium in the project area is likely to be quite thick. Underlying these deposits is older Quaternary alluvium of Pleistocene age (2.6 Million Years ago [Ma] to 10,000 BP). The hills south and southwest of the project area are made up of surface exposures of the bedrock of the Monterey Formation (also referred to as the Puente Formation in this area) of late Miocene age (11.6 Ma to 5.3 Ma). However, bedrock is likely present only at a significant depth beneath the alluvium.

The paleontological sensitivity of these sediments ranges from low to highly sensitive. Quaternary younger alluvial deposits of Holocene-age deposits contain the remains of modern organisms and are too young to contain fossils. Younger alluvial deposits have been determined to have a low potential for paleontological resources. Typically, Quaternary older alluvial deposits throughout
southern California are considered to be highly sensitive for vertebrate fossils. The Monterey Formation, the uppermost layers of consolidated bedrock underlyng the alluvial deposits, is considered to have a high sensitivity for paleontological resources.

Deep excavations associated with the proposed project, those that extend ten feet or more below the ground surface, may encounter significant fossil resources. Disturbance of significant paleontological resources would result in a significant adverse impact. Mitigation Measure PAL-1 would reduce impacts associated with the proposed project to a less-than-significant level.

**Alternative 1**

Alternative 1 encompasses two options for two new baseball fields in the Crystal Springs Picnic Area of Griffith Park.

**Options A and B**

Alternative 1, Option A and Alternative 1, Option B are located on the west side of the Los Angeles River. The location of Options A and B is underlain by thick floodplain deposits of younger Quaternary alluvium, derived from the Los Angeles River.

**Alternative 2**

Alternative 2 is located on the east side of the Los Angeles River. The location of Alternative 2 is also underlain by thick floodplain deposits of younger Quaternary alluvium, derived from the Los Angeles River.

**Paleontological Resources Environmental Impact Analysis**

**Methodology**

Potential impacts on paleontological resources from the proposed project were evaluated by determining whether ground-disturbing activities could affect areas that could contain any unique paleontological resource or site or a unique geologic feature. Information was gathered about existing conditions at the project site by examining geological maps, and by review of reports from nearby projects that did or did not recover paleontological resources. The impact analysis presented below addresses the impacts and identifies the measures that would mitigate impacts found to be significant.

**Thresholds of Significance**

For the purposes of this analysis, in accordance with Appendix G of the State CEQA Guidelines, the project alternatives would have a significant environmental impact on paleontological resources if they would:

1. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
In addition, the *L.A. CEQA Thresholds Guide* (2006) provides that a determination of significance shall be made by considering the following factors:

1. Whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a paleontological resource; and
2. Whether the paleontological resource is of regional or statewide significance.

**Construction Impacts**

**Alternative 1**

Alternative 1 encompasses two options at the Crystal Springs Picnic Area location.

**Option A**

Alternative 1, Option A would require construction activities that would include limited amounts of ground disturbance. These may include grading and leveling, and utility trenching associated with replacing or upgrading electrical and plumbing systems and drainage elements. These activities are likely to be shallow in depth, and overall, the potential for encountering buried paleontological resources is considered to be low. However, trenching excavations could encounter significant fossil resources. Disturbance of significant paleontological resources, if any were encountered, would result in a significant impact prior to implementation of Mitigation Measure PAL-1.

**Option B**

Alternative 1, Option B would require similar construction activities as Alternative 1, Option A, and these activities would have similar impacts. Disturbance of significant paleontological resources, if any were encountered, would result in a significant impact prior to implementation of Mitigation Measure PAL-1.

**Alternative 2**

Alternative 2 would require similar construction activities as Alternative 1, Options A and B, and these activities would have similar impacts. Disturbance of significant paleontological resources, if any were encountered, would result in a significant impact prior to implementation of Mitigation Measure PAL-1.

**Operational Impacts**

**Alternative 1**

**Option A**

No earthmoving activities would occur during the operational phase of the project. Therefore, operation of Alternative 1, Option A would not result in impacts to paleontological resources.

**Option B**

No earthmoving activities would occur during the operational phase of the project. Therefore, operation of Alternative 1, Option B would not result in impacts to paleontological resources.
Alternative 2

No earthmoving activities would occur during the operational phase of the project. Therefore, operation of Alternative 2 would not result in impacts to paleontological resources.

Paleontological Resources Mitigation Measures

As discussed above, disturbance of paleontological resources would result in a significant impact under Alternatives 1 and 2. Therefore, the following mitigation measure is needed to reduce this impact.

**PAL-1:** Project plans shall specify that a qualified paleontologist shall monitor initial ground disturbance at depths below ground surface greater than ten feet. The qualified paleontologic monitor shall retain the option to reduce monitoring if, in his or her professional opinion, the sediments being monitored were previously disturbed. Monitoring may also be reduced if the potentially fossiliferous units, previously described, are not present or, if present, are determined by qualified paleontologic personnel to have a low potential to contain fossil resources. The monitor shall be equipped to salvage fossils and samples of sediments as they are unearthed to avoid construction delays and shall be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens. Recovered specimens shall be prepared to a point of identification and permanent preservation, including washing of sediments to recover small invertebrates and vertebrates. Specimens shall be curated into a professional, accredited museum repository with permanent retrievable storage. A report of findings, with an appended itemized inventory of specimens, shall be prepared and shall signify completion of the program to mitigate impacts on paleontological resources.

Paleontological Resources Significant Unavoidable Impacts

Mitigation Measure PAL-1 would reduce the paleontological resources impact to a less-than-significant level. Therefore, no significant unavoidable adverse impacts to paleontological resources would occur.

Paleontological Resources Cumulative Impacts

The study area for cumulative impacts to paleontological resources is defined for this project as the Griffith Park and Los Angeles River Narrows areas of Los Angeles. In this area, construction activities associated with the project alternatives could disturb or destroy paleontological resources that may exist in the project area, and thereby contribute to the progressive loss of paleontological fossil resources. However, it is unknown if significant resources exist in these areas.

Nonetheless, the proposed project’s alternatives would not contribute to a cumulative impact related to paleontological resources. Mitigation Measure PAL-1 would reduce potential project-related impacts. This mitigation measure includes treatment of any discovered cultural resources to mitigate impacts, preparation of a final report and curation of discovered materials in an approved facility. The incremental effects of the proposed project, after mitigation, would not contribute to a significant adverse cumulative impact to paleontological resources. With mitigation, all project-related impacts would be reduced to a less-than-significant level; therefore, the build alternatives’ contribution to significant cumulative impacts would be rendered less than cumulatively considerable.
References

Historic Resources


Archaeological Resources


Paleontological Resources