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**GREATER GRIFFITH PARK
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October 18, 2007

David Attaway
Environmental Supervisor
Environmental Management Section
City of Los Angeles
Department of Recreation and Parks
1200 West 7th Street
Los Angeles, CA 90017

Autry National Center's Griffith Park Campus
Draft Environmental Impact Report

Dear Sir:

The following are the comments of the Greater Griffith Park Neighborhood Council to the Draft Environmental Impact Report relating to Autry National Center's Griffith Park Campus Improvements Project dated August 1, 2007, a copy of which was first furnished to us by the Autry National Center ("Autry") on October 1, 2007.

We (and we understand others) asked you for an extension of the deadline to the end of this calendar year to provide you with comments. This was made after the representative of the Autry attending our Board's September meeting represented that such a delay would not prejudice the Autry. Nevertheless, that request was implicitly denied by your extending the deadline only to October 18.

We have made very substantial efforts to understand the environmental problems presented by this proposal.

Prior to October 1 we held several meetings with the Autry's senior representatives of a general nature regarding this project.

After October 1 we had members of two of our committees spend over four hours touring both the Autry's Griffith Park facilities and the Southwest Museum ("Southwest"). We also held a public meeting of two of our committees devoting nearly three hours to a discussion with the Autry's senior management and its environmental counsel as well as interested members of the public. This meeting was designed to understand the proposed project and to gain further information from the Autry relating to the perceived needs of the Autry and the alternatives available to the project in Griffith Park. On October 16, our Board considered the report of those committees and received further presentations from the Autry and other members of the public.

Nevertheless, because of the short period of time to do all this and to make a limited review the extensive draft EIR we can only give you within the prescribed period

general comments relating to major issues. We are not able to comment on a number of matters which may have a very significant impact on the environment of Griffith Park and the surrounding areas, such as

1. the effect on the ability of your Department to fund environmental improvements to Griffith Park by reason of the Autry's lease payment of a nominal \$1 per year being clearly less than the cost to your Department of the consequences of the Autry's presence and operations in Griffith Park; and
2. the effect that the expansion and construction of a very special purpose building in the park will have on the City's ability to use the structure for purposes within the mission of your Department when the land and buildings revert to the City in 2037.

We recognize that the limited scope of our comments places on you a greater burden than you would otherwise bear to independently review and revise the draft EIR if you had our comments distilled and expanded as a result of two more months of review and discussion. However, at our October 16 meeting our Board inquired directly of the Autry's chief executive officer whether the Autry would request, or join in a further request, to extend the comment period to December 31, and he declined to do so.

Our failure to comment beyond what is contained in this letter ought not to be construed as support for any portion of the draft. Moreover, we reserve the right to comment further regarding such matters as the style and size of the building when the matter comes back to us for the zone variance, conditional use permit or any other discretionary permission required to effect this project.

Because of the short comment period allowed for review of this draft and the significance of the areas subject to our comments and the likelihood of your receiving comments from others of significant concerns we suggest and request that rather than going directly to a final EIR you take all the comments you receive and go to a second draft EIR to be circulated for further comment.

Subject to the foregoing our comments on the draft EIR are as follows:

I. Alternatives to the Project.

We have spent a substantial amount of time considering this most important portion of the draft EIR, and we believe that the draft is particularly deficient in the analysis of Alternative E, expansion at the Southwest.

We have been unable to obtain from the Autry a cogent explanation for the dramatic change in its plans from the time of the merger with the Southwest. In 2003 it appears that the proposal was to increase the space at the Autry in Griffith Park by 40,000 square feet. 20,000 square feet was to be obtained by enclosing the existing courtyard and was to be devoted to exhibit space for some of the Southwest's collection which could not be exhibited at the Southwest due to limited space in relation to the collection. The additional 20,000 square feet was to be new space for storage.

Our concern is that now the proposed expansion of the combined Autry and Southwest has grown to 129,000 square feet, all in Griffith Park with not only no increase at the Southwest but a decrease in the use of the Southwest. Thus, the proposed project places the entire burden of the merged museums onto the open space of the relatively scarce flat land of Griffith Park.

The 227-page Southwest Museum Rehabilitation Study commissioned by the Autry in about 2003 together with our own inspection indicate that it is feasible and probably economically cheaper to rehabilitate, and modestly add to, the Southwest site rather than effecting the proposed project in Griffith Park resulting in the loss of public open space. Such an expansion of the Southwest would have the added benefit of a non-City entity using its own land rather than City land in Griffith Park. Moreover, it would preserve the most prominent historical, cultural asset of the Arroyo Seco area of our City.

The proposed expansion by the Autry in Griffith Park in our opinion requires an environmental analysis of the natural consequence of the project on the Southwest. If the expansion is allowed into Griffith Park, the natural (and professed) consequence will be the substantial reduction in exhibition space at the Southwest. (Autry has told us it would commit to no more than 2 rooms of exhibition space for its collection, with the balance of the buildings being used for public art exhibits and public meeting areas.) The proposed expansion into Griffith Park might well lead to the entire loss of the Southwest and its site as the Autry could well sell off the site under its merger agreement shortly following the completion of the proposed project in Griffith Park. Indeed, the project in Griffith Park, designed as it is to allow for full display of both collections as well as storage, makes the Southwest site redundant. Loss of such a cultural heritage of Charles Lummis might well imperil other related historical and cultural sites in the Arroyo Seco.

The project also proposes the moving of the contents of the Brand Library from the Southwest to Griffith Park. We have been given no explanation of the imperative for the move which will result not only in the further imposition on open space in the park but result in the needless loss to the Arroyo Seco community. This part of the project should also be included in the analysis of the alternative of no, or only limited, expansion into Griffith Park.

The redrafted EIR should also discuss as an alternative to the project as proposed the utilization of a site, neither in Griffith Park nor at the Southwest, for storage of those portions of the collections which are not deemed significant enough to be placed either in a permanent exhibition or in an instructive open-storage area.

Therefore the redrafted EIR should contain a more substantive analysis of the alternative of restoration of the Southwest as a fully operational museum with possible additions of buildings to avoid or limit the expansion into Griffith Park. Moreover, there should be an environmental analysis of the environmental effect on the Arroyo Seco area of the removal of the collection from that area and the potential loss of cultural identity and pride resulting from the loss of a world famous museum.

II. Guarantee of Completion.

We have not been provided with any substantiated assurances that if the project were permitted the Autry would have the financial ability to fund it. Obviously, an incomplete project would have a substantial adverse environmental effect on the park. The objective financial condition of the Autry requires a very substantial, and for the Autry an apparently unprecedented, fund-raising effort at a time of anticipated reduced charitable giving.

Therefore, the redrafted EIR ought to address this issue, including the requirement of the posting of appropriate completion bonds. We understand from Autry's counsel that that is an acceptable solution to the problem. An iron-clad guarantee of completion of any approved project should, however, be made a condition.

III. Parking.

The project proposes moving surface parking from the westerly face of the current museum to the southeasterly and increasing the number of spaces. As part of the second phase the project proposes a parking structure, in part above ground.

The draft EIR is deficient in failing to analyze the alternative of relying on the Zoo parking lot directly adjacent to the museum as allowed by the Autry's lease.

We do not believe parking structures, whether above or below ground, are appropriate for the park as they are inconsistent with the entire concept of open space and making all man-made structures in the park as reversible as possible. This is especially so when the entity proposing to construct the facility is only a ground lessee whose lease has but 30 years remaining.

Additionally, due to climate change and attendant drought, the need to recapture storm water in arid regions such as Los Angeles has become of paramount importance. The adjacent Los Angeles Zoo is currently in the process of renovating its 33-acre parking area with bioswales and a permeable surface to replenish the water table. The addition of a parking structure which would be necessarily of impermeable materials directly across from a Prop O-funded Demonstration of Environmental Sustainability Project would negate the environmental instruction and gain being made at the Zoo lot.

IV. Environmentally Sensitive Construction.

We believe the redrafted EIR ought to incorporate analyses of the alternatives of construction which will be most advantageous to the environment, such as permeable parking surfaces, collection of rain water and the use of "green" materials generally.

V. Effects of Flora and Fauna.

The project proposes nearly doubling the size of the foot print of the current structure. The park is, as basically an open space, the home to many species of flora and fauna. The redrafted EIR should contain an analysis of the flora present on the entire 12 acre site and the effect of closing off parkland for the extensive development of the Griffith Park site of the Autry. The redrafted EIR should also examine the traffic patterns of fauna, their habitat space needs, and how the development would affect the genetic viability of park and river fauna.

Very truly yours,

Charley Mims, President

By Kenneth E. Owen
Chair, Planning, Zoning and Historic Preservation Committee