

APPROVED
06-15-2016

BOARD OF RECREATION
& PARK COMMISSIONERS

BOARD REPORT

NO. 16-143

DATE June 15, 2016

C.D. 14

BOARD OF RECREATION AND PARK COMMISSIONERS

SUBJECT: EL SERENO CLUBHOUSE DEMOLITION PROJECT - AUTHORIZATION TO DEMOLISH, APPROVAL OF DEMOLITION PLANS; CERTIFICATION OF THE ENVIROMENTAL IMPACT REPORT

AP Diaz	_____	V. Israel	_____
*R. Barajas	_____	K. Regan	_____
H. Fujita	_____	N. Williams	_____

Ramon Barajas for

General Manager

Approved _____ Disapproved _____ Withdrawn _____

RECOMMENDATIONS

1. Review, consider, and certify the Final Environmental Impact Report (FEIR) for the proposed demolition of the old El Sereno Clubhouse, on file in the Board Office, (State Clearinghouse No. 20140310041 and City Document No. EIR-15-012-RP); finding that:
 - a. all potentially significant environmental effects of the project have been properly disclosed and evaluated in compliance with the California Environmental Quality Act (CEQA) and the State and City CEQA Guidelines,
 - b. the information contained in the Final EIR was reviewed and considered prior to approving the El Sereno Clubhouse Demolition Project (Project),
 - c. the FEIR reflects the Department of Recreation and Parks' (RAP's) independent judgment and analysis, and,
 - d. the documents constituting, and the record of proceedings in this matter, are located in the files of the (RAP's) Planning, Construction and Maintenance Branch;
2. Adopt the Findings of Fact and Statement of Overriding Consideration set forth in Exhibit A;
3. Adopt the Mitigation Monitoring and Reporting Plan set forth in Section 4 of the FEIR;

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4. Direct RAP's Environmental Management staff to file a Notice of Determination with the Los Angeles City Clerk and County Clerk within 5 business days of the certification of the Final FEIR; and,
5. Authorize demolition of the old El Sereno Clubhouse and approve the demolition plans substantially in the form on file in the Board Office.

SUMMARY

El Sereno Recreation Center is located at 4721 Klamath Street in the community of El Sereno. The 19-acre park includes an auditorium, barbeque pits, baseball diamond, basketball courts, children's play area, community room, indoor/outdoor gym, picnic tables, tennis courts, an indoor pool, a skate park, and a clubhouse with concession stand. Specifically, the Project site includes the portion of the park that contains the Clubhouse, concession stand and a paved area with benches just north of the Clubhouse.

RAP proposes to construct and install several new recreational facilities within the El Sereno Recreation Center and Park boundaries. To accommodate these new recreational facilities, the Clubhouse and concession stand would be demolished. A basketball court is proposed to be installed in the vacated area.

Built in 1949 and designed by architect Milton Caughey, the Clubhouse is an approximately 3,850-square-foot, one-story, wood-framed, stucco building that is accented by cut-stone veneer at the southern end of the building. The Clubhouse has two restrooms, a craft room, six storage rooms, a kitchen areas, an auditorium area with a stage, a water heater closet, an equipment room, a covered terrace, and a detached concession stand. The concession stand, measuring approximately 13 feet by 9 feet, located across the terrace from the Clubhouse is a small wood-framed structure. The Clubhouse has been closed to the public for a number of years and is currently being used as a park maintenance equipment storage facility. Due to disuse, the building condition is in severe disrepair. Windows and doors have been covered with plywood and some siding from both buildings has been removed. Asbestos and lead abatement work was performed on the Clubhouse and concession stand in November 2013.

Although the park that was initially developed circa 1931 was recorded as a historic district and the park property was determined eligible for listing in the National Register of Historic Places for its association with events that have made a significant contribution to the broad patterns of our history, the Clubhouse and concession stand were not included as part of the Federal and State designations. In addition, a 2013 Historic Structures Report found that the Clubhouse was individually not eligible for listing in the California or National Registers. However, the El Sereno Recreation Center Clubhouse embodies the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period, and as such is eligible for listing as a City of Los Angeles Historic-Cultural Monument for its Post-World War II Modernist-style architecture. Therefore, the El Sereno Recreation Center Clubhouse is considered a historical resource for the purposes of CEQA, and the demolition of the building would constitute a significant direct impact to cultural resources

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The Draft EIR was circulated to all interested parties and responsible agencies for a forty-five (45) day review and comment period from October 29, 2015 to December 14, 2015. During this public review and comment period, only one comment letter was received concerning the impact of construction trucks on State highways. All comments that were received and City responses to significant environmental issues raised were incorporated into the FEIR. A Mitigation Monitoring and Reporting Plan (MMRP) has been prepared that specifies all of the feasible mitigation measures identified in the FEIR, which will either reduce or eliminate the potentially significant environmental impacts of the Project in accordance with Section 15097 of the State CEQA Guidelines. However, as described above, the Project would result in unavoidable, significant adverse impacts to cultural resources, and as such, requires that the Board adopt the Findings of Fact (Findings) and the Statement of Overriding Considerations (Exhibit A) prior to taking action to approve the Project. The Findings is a written statement made by the decision-making body of the lead agency that explains how it dealt with each significant impact and alternative in the EIR. The Statement of Overriding Considerations explains in detail why the social, economic, legal, technical or other beneficial aspects of the Project outweigh the unavoidable, adverse environmental impacts, and why the lead agency is willing to accept such impacts.

FISCAL IMPACT STATEMENT:

The approval and execution of the final plans for the Project will not have any impact on the General Fund.

The estimated costs for the design, development, and construction of the proposed park improvements are anticipated to be funded by funding sources other than the RAP's General fund.

At this time, there is no fiscal impact to RAP for the maintenance of the Project. Once the final Project design is completed, operational maintenance costs will be determined. Upon Project completion, a request for funding will be submitted in future RAP annual budget requests.

This Report was prepared by Paul Davis, Environmental Supervisor II, Planning, Construction, and Maintenance Branch.

LIST OF ATTACHMENTS.

1. Environmental Findings
2. Final Environmental Impact Report

EXHIBIT A

ENVIRONMENTAL FINDINGS OF FACT AND STATEMENT OF OVERRIDING
CONSIDERATION

FINDINGS OF FACT AND STATEMENT OF OVERRIDING CONSIDERATIONS

I. ENVIRONMENTAL DOCUMENTATION BACKGROUND

On October 2, 2014, a Notice of Preparation (NOP) was issued by the Los Angeles Department of Recreation and Parks (LADRP) for the preparation of an Environmental Impact Report (EIR) for the El Sereno Park Improvement Project (proposed project), starting a 30-day public review period. Subsequent to the NOP public review period, a Draft EIR was prepared. The Draft EIR for the proposed project (SCH No. 20140310041), incorporated herein by reference in full, was prepared pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 *et seq.*) and the CEQA Guidelines (Title 14 California Code of Regulations Section 15000 *et seq.*). In compliance with the CEQA Guidelines Sections 15085 and 15087, a Notice of Availability was circulated from October 29, 2015 to December 14, 2015. During the same period, the Draft EIR was made available for public review and comment, in accordance with CEQA Guidelines Section 15087. One written comment was received during the Draft EIR public review period were addressed in the Final EIR.

The Final EIR was created to serve as an informational document for public agency decision-makers and the general public regarding the objectives and components of the proposed project pursuant to CEQA and the CEQA Guidelines. The Final EIR includes corrections and additions to the Draft EIR and comments and responses required by the CEQA Guidelines. The Final EIR was sent to all public agencies and members of the public that made comments on the Draft EIR, at least ten days prior to scheduled certification of the Final EIR pursuant to CEQA Guidelines Section 15088(b). The Final EIR is the primary reference document for the formulation and implementation of a Mitigation Monitoring and Reporting Program (MMRP) (see Chapter 4.0 Mitigation Monitoring and Reporting Program of the Final EIR).

Environmental impacts cannot always be mitigated to a level that is considered less than significant. In accordance with the CEQA Guidelines, if a lead agency approves a project that has significant impacts that are not substantially mitigated (i.e., resulting in unavoidable significant impacts), the agency shall state in writing the specific reasons for approving the project based on the final CEQA documents and any other information in the public record for the project (see CEQA Guidelines Section 15093[b]). This is called a “statement of overriding considerations.” These findings, as well as the accompanying statement of overriding considerations are shown below.

II. ORGANIZATION

The Findings of Fact and Statement of Overriding Considerations (SOC) are organized by the following sections:

- Section I: Environmental Documentation Background
- Section II: Organization
- Section III: Findings required under CEQA
- Section IV: Description of the Proposed Project
- Section V: Summary of Environmental Impacts
- Section VI: Findings Regarding Project Alternatives
- Sections VII: Findings Regarding Other CEQA Considerations
- Section VIII: Statement of Overriding Considerations
- Section IX: Mitigation, Monitoring, and Reporting Program

CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to substantially lessen or avoid significant environmental impacts that would otherwise occur. Project modification or alternatives are not required; however, where such changes are infeasible or where the responsibility for modifying the project lies with some other agency.²

With respect to a project for which significant impacts are not avoided or substantially lessened, the lead agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project's "benefits" rendered "acceptable" its "unavoidable adverse environmental effects."³

These findings constitute the LADRP's best efforts to set forth the evidentiary and policy basis for its decision to approve the proposed project in a manner consistent with the requirements of CEQA. To the extent that these findings conclude that various mitigation measures outlined in the EIR are feasible and are within the LADRP's jurisdiction and responsibility, and to the extent these mitigation measures have not been modified, superseded or withdrawn, the LADRP hereby binds itself to implement these measures. These findings, in other words, are not merely informational, but rather constitute a binding set of obligations that will come into effect when the LADRP adopts a resolution approving the proposed project.

The documents and other materials that constitute the whole record of proceedings on which the CEQA findings are based are located at the LADRP in Los Angeles, California.

IV. DESCRIPTION OF THE PROPOSED PROJECT

The proposed project consists of the construction and installation of several new recreational facilities within the El Sereno Recreation Center and Park boundaries. To accommodate these new recreational facilities, the Clubhouse and concession stand would be demolished. A basketball court and batting cage would be constructed within the existing building footprint of the Clubhouse. In addition, a jogging path, fitness equipment, picnic tables, benches, and drinking fountains would be installed in the paved area just north of the Clubhouse. All facilities would be accessible according to the American Disabilities Act standards.

V. SUMMARY OF ENVIRONMENTAL IMPACTS

Below are the determinations of the LADRP regarding the environmental effects, significant impacts, and corresponding mitigation measures organized by topic area. These determinations or findings address the effects of the proposed project. Each impact is followed by a discussion of mitigation to reduce the environmental effects and a finding.

BIOLOGICAL RESOURCES

Significance Criteria

In accordance with Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact related to biological resources if it would:

- Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

²CEQA Guidelines Section 15091(a), (b).

³CEQA Guidelines Sections 15093 and 15043(b); see also Public Resource Code Section 21081(b).

Impact

The El Sereno Recreation Center property has been determined eligible for listing in the National Register of Historic Places (NRHP) as a historic district (19-176190) for its associations with events that have made a significant contribution to the broad patterns of our history; and is considered a historical resource under CEQA. However, shortly after its recordation, the El Sereno Recreation Center underwent a major rehabilitation that resulted in the demolition of the 1931 community building and outdoor pool, and the replacement of the baseball diamond. This project also included the construction of the current indoor pool building that is located adjacent to the El Sereno Clubhouse. As a result of the demolition and extensive alteration to three of the four contributing resources recorded in 1994, the integrity of the district has been significantly compromised and it is likely no longer significant. Therefore demolition of the El Sereno Clubhouse would not constitute a significant adverse impact to the previously El Sereno Recreation Historic District. In addition, the Clubhouse is one of many such property-types at the State and national level, and it does not appear eligible for listing in the California or National Registers for its design/construction (Criterion C/3). Likewise, the Clubhouse does not appear to be associated with historic events (Criterion A/1) or people (Criterion B/2), and there is no evidence that the property may be likely to yield information important in prehistory or history (Criterion D/4). However, the Clubhouse is an excellent example of a Postwar Modernist-style institutional building designed by the regionally-notable architect Milton Caughey. It is one of his earliest-known institutional buildings and includes many of the Modernist design elements he would later employ in American Institute of Architects-recognized projects, such as exposed metal trusses, sun-shading, and covered outdoor hallways. Additionally, while Postwar Modernist-style architecture proliferated across Los Angeles in the late-1940s through the 1960s, there are relatively few known examples in the community of El Sereno, and the Clubhouse stands as a rare example of an architectural and cultural trend that characterized the City and the country as a whole. Although the building is currently vacant with its windows boarded, it retains integrity of its location, design, setting, materials, workmanship, and association. The Clubhouse embodies the distinguishing characteristics of an architectural-type specimen, inherently valuable for a study of a period, and as such appears eligible for listing as a City of Los Angeles Historic-Cultural Monument for its Postwar Modernist-style architecture. Therefore, the El Sereno Clubhouse is considered a historical resource for the purposes of CEQA, and the demolition of the building would constitute a significant direct impact to cultural resources insofar as it entails a substantial adverse change in the significance of historical resources.

Reference

Draft EIR Section 4.1, pages 4.1-10 – 4.1-11.

Mitigation Measures

- CR1** During construction, if buried cultural resources, such as chipped or ground stone, historical artifacts, building foundations, or human bone, are inadvertently discovered during ground disturbing activities, the contractor shall ensure that all work will stop in that area and within 100 feet of the find until a qualified archaeologist can assess the significance of the find and, if necessary, develop appropriate treatment measures in consultation with the City.

- CR2** Prior to the start of construction, a qualified paleontologist shall conduct a pre-construction site visit and complete a paleontological assessment memo detailing the results of the site visit, additional research, and a sensitivity analysis in order to assess the relationship between the proposed project location and the Puente Formation. The paleontological assessment shall also include additional mitigation, if deemed necessary.

Mitigation Measure **CR4** would reduce impacts resulting from the demolition of the Clubhouse and concession stand; however, no feasible mitigation measures were identified to reduce the significant direct impact to cultural resources insofar as it entails a substantial adverse change in the significance of historical resources. Therefore, the proposed project would result in a significant and unavoidable impact related to historical resources.

NOISE AND VIBRATION

Significance Criteria

In accordance with Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact related to cultural resources if it would:

- Expose persons or generate noise to levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
- Expose people to or generate excessive vibration or groundborne noise levels;
- Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project; and/or
- Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

The City of Los Angeles has established significance thresholds in its *L.A. CEQA Thresholds Guide*. The following specific significance thresholds are relevant to the proposed project.

The proposed project would have a significant impact related to construction noise if:

- Construction activities lasting more than one day would exceed existing ambient noise levels by 10 dBA or more at a noise-sensitive use;
- Construction activities lasting more than ten days in a three-month period would exceed existing ambient noise levels by 5 dBA or more at a noise-sensitive use; and/or
- Construction activities would exceed the ambient noise level by 5 dBA at a noise-sensitive use between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or anytime on Sunday.

Impact

Construction of the proposed project would result in temporary increases in ambient noise levels in the project area on an intermittent basis. In accordance with the City of Los Angeles Noise Ordinance, construction crews would work no more than eight hours a day and would restrict their activities to between 7:00 a.m. and 8:00 p.m. on non-federal holiday weekdays, and between 8:00 a.m. and 6:00 p.m. on Saturdays.

Ambient noise levels in the community surrounding the project site range from 50.8 to 70.8 dBA Leq, and certain construction activities would audibly increase ambient noise levels. Overall, it is anticipated that the majority of demolition, site preparation, and construction activities associated with the proposed project would involve manual labor as opposed to mechanical equipment. Manual labor generates much less noise than mechanically-driven heavy-duty equipment. Nonetheless, noise levels related to construction activity would exceed the 5-dBA significance threshold at residences near the project site. Therefore, without mitigation, the proposed project would result in a significant impact related to typical construction noise, as construction activity would expose people to or generate noise levels in excess of applicable standards, and result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

VI FINDINGS REGARDING PROJECT ALTERNATIVES

EVALUATION OF ALTERNATIVES

Where a significant impact can be substantially lessened (i.e., mitigated to an “acceptable level”) solely by the adoption of mitigation measures, the lead agency, in drafting its findings, has no obligation to consider the feasibility of alternatives with respect to that impact, even if the alternative would mitigate the impact to a greater degree than the project.⁴ CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to substantially lessen or avoid significant environmental impacts that would otherwise occur. Project modification or alternatives are not required, however, where such changes are infeasible or where the responsibility of modifying the project lies with some other agency.⁵

The preceding discussion regarding project impacts discloses that the proposed project would result in significant and unavoidable impacts associated with historical resources and construction noise. Thus, the LADRP, in considering alternatives in these findings, need only determine whether any alternatives are environmentally superior with respect to those impacts not mitigated to a less-than-significant level. If any alternatives are superior with respect to those impacts, the LADRP is then required to determine whether the alternatives are feasible. If the LADRP determines that no alternative is both feasible and avoids the unavoidable significant impacts of the proposed project, then the LADRP may approve the project as mitigated.

These findings address whether the alternatives lessen or avoid the significant unavoidable impacts associated with the proposed project and consider the feasibility of each alternative. Under CEQA, “(f)feasible means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors” (CEQA Guidelines Section 15364). The concept of feasibility permits agency decision makers to consider the extent to which an alternative is able to meet some or all of a project’s objectives. In addition, the definition of feasibility encompasses desirability to the extent that an agency’s determination of infeasibility represents a reasonable balancing of competing economic, environmental, social, and technological factors.

The LADRP finds that the range of alternatives studied in the EIR reflects the various types of alternatives that would potentially be capable of reducing the proposed project’s environmental effects, while accomplishing most but not all of the project objectives. The LADRP finds that the alternatives analysis is sufficient to inform the LADRP and the public regarding the tradeoffs between the degree to which alternatives to the project could reduce environmental impacts and the corresponding degree to which the alternatives would hinder the petitioners’ ability to achieve its project objectives.

The Draft EIR identified and compared environmental effects of the two alternatives described below with environmental impacts resulting from the proposed project. Based on substantial evidence in the whole record of these proceedings, the LADRP finds that the two alternatives listed below would reduce the unavoidable and significant impacts of the proposed project but would not meet all of the project objectives. The full analysis of project alternatives, set forth in Chapter 5.0 Alternatives of the Draft EIR, is hereby incorporated by reference into this evaluation of alternatives.

⁴Public Resource Code Section 21002; *Laurel Hills Homeowners Association*, *supra*, 83 Cal.App.3d at p. 521; see also *Kings City Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 730-731; *Laurel Heights Improvement Association v. Regents of the University of California* (1988) 47 Cal.3d 376, 400-403.

⁵CEQA Guidelines Section 15091(a), (b).

north of the Clubhouse, similar to the proposed project. Therefore, the Adaptive Reuse Alternative would result in less-than-significant impacts related to cultural resources and avoid the significant and unavoidable historic resource impacts of the proposed project.

Noise. Under Alternative 2, the Clubhouse would be rehabilitated for use as additional community space. Renovation activities would generate temporary construction noise and vibration similar to the proposed project. While it is assumed that the Adaptive Reuse Alternative would involve less construction than the proposed project, construction noise impacts under the Adaptive Reuse Alternative would likely remain significant and unavoidable similar to the proposed project due to the operation of heavy-duty equipment and proximity to sensitive receptors. Regarding operations, noise impacts would be similar to the proposed project since there would be the same amount of outdoor equipment and recreation space would be provided. Therefore, the Adaptive Reuse Alternative would result in similar impacts compared to the proposed project and construction noise impacts would remain significant and unavoidable.

Environmentally Superior Alternative. The No Project Alternative would temporarily avoid the significant impact related to historic resources and would not have any effect on noise levels. However, the Clubhouse and concession stand would continue to deteriorate and in time, the Clubhouse would become even more dilapidated, resulting in the inability to document and photograph it in the form of HABS documentation. Also, the No Project Alternative would not be consistent with the project objectives of reducing public safety hazards by eliminating the risk of fire, structural collapse, personal injury to trespassers, vandalism and crime, by demolishing an abandoned, deteriorated building and increasing usable park space in the community. The Adaptive Reuse Alternative would eliminate the significant and unavoidable historic resource impact and would be consistent with the project objectives to reduce public safety hazards and eliminate maintenance costs. However, this alternative would not increase usable park and open space within the community.

Of the two alternatives, the Adaptive Reuse Alternative would be considered the environmentally superior alternative because it produces the fewest impacts when compared to the proposed project. While the Adaptive Reuse Alternative is superior from a strictly environmental standpoint, it does not meet the goals and objectives of the LADRP in terms of increasing usable park space in the community.

VII. FINDINGS REGARDING OTHER CEQA CONSIDERATIONS

1. The LADRP finds that the EIR was prepared in compliance with CEQA and the CEQA Guidelines. The LADRP finds that it has independently reviewed and analyzed the EIR for the proposed project, that the Draft EIR which was circulated for public review reflected its independent judgment and that the Final EIR reflects the independent judgment of the LADRP.
2. The LADRP finds that the EIR provides objective information to assist the decision-makers and the public at large in their consideration of the environmental consequences of the project. The public review period provided all interested jurisdictions, agencies, private organizations, and individuals the opportunity to submit comments regarding the Draft EIR. The Final EIR was prepared after the review period and responds to comments made during the public review period.
3. The LADRP staff evaluated comments on environmental issues received from persons who reviewed the Draft EIR. In accordance with CEQA, the LADRP staff prepared written responses describing the disposition of significant environmental issues raised. The Final EIR provides adequate, good faith and reasoned responses to the comment. The LADRP reviewed the comment received and response thereto and has determined that neither the comments received nor the response to such comments add significant new information regarding environmental impacts to the Draft EIR. The LADRP has

additional housing, either directly or indirectly, in the surrounding environment. New employees from commercial and industrial development and new population from residential development represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area. Examples of development that would indirectly facilitate or accommodate growth include the installation of new roadways or the construction or expansion of water delivery/treatment facilities.

The proposed project would not remove impediments to growth. The area surrounding the project site is primarily developed with residential uses and is served by appropriate infrastructure and public services.

SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL EFFECTS

CEQA Guidelines Section 15126.2(c) provides the following direction for the discussion of irreversible changes:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Project development will not directly result in any permanent and irreversible environmental changes based on the minimal and efficient use of non recoverable resources (Draft EIR, Chapter 6.0 subsection 6.4).

VIII. STATEMENT OF OVERRIDING CONSIDERATIONS

CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a project against its unavoidable risks when determining whether to approve a project. If the specific economic, legal, social, technological or other benefits of the project outweigh the unavoidable adverse environmental effects, those effects may be considered acceptable (CEQA Guidelines Section 15093[a]). CEQA requires the agency to support, in writing, the specific reasons for considering a project acceptable when significant impacts are not avoided or substantially lessened. Those reasons must be based on substantial evidence in the EIR or elsewhere in the administrative records (CEQA Guidelines Section 15093[b]). In accordance with the requirements of CEQA and the CEQA Guidelines, the LADRP finds that the mitigation measures identified in the Draft EIR and the MMRP, when implemented, avoid or substantially lessen virtually all of the significant effects identified in the Draft EIR. Nonetheless, a significant impact from the project is unavoidable even after incorporation of all feasible mitigation measures. This significant unavoidable impact is summarized below.

Impacts related to Cultural Resources. The demolition of El Sereno Recreation Center Clubhouse building would result in a significant and unavoidable impact to a historic resource.

The El Sereno Recreation Center property has been determined eligible for listing in the National Register of Historic Places (NRHP) as a historic district (19-176190) for its associations with events that have made a significant contribution to the broad patterns of our history. However, as a result of the demolition and extensive alteration to three of the four contributing resources recorded in 1994, the integrity of the district has been significantly compromised and it is likely no longer significant. Therefore, demolition of the El Sereno Recreation Center Clubhouse would not constitute a significant adverse impact to the previously El Sereno Recreation Historic District. In addition, the Clubhouse is one of many such property-types at the State and national level, and it does not appear eligible for listing in

EL SERENO PARK IMPROVEMENT PROJECT FINAL ENVIRONMENTAL IMPACT REPORT



Prepared for

CITY OF LOS ANGELES
DEPARTMENT OF RECREATION AND PARKS

Prepared by

TERRY A. HAYES ASSOCIATES INC.

JANUARY 2016

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2.0 RESPONSE TO COMMENTS

The Draft EIR was available for a 45-day public review period between October 29, 2015 and December 14, 2015. During this period, one written comment was received. This Final EIR provides responses to the only written comments received on the Draft EIR during the 45-day public review period.

The comment letter received is listed in **Table 2-1** and the corresponding responses are provided. A copy of the comment letter is provided prior to the response.

TABLE 2-1: LIST OF COMMENTERS		
No.	Name	Address
1	Scott Morgan	State of California Governor's Office of Planning and Research State Clearinghouse and Planning Unit 1400 10 th Street Sacramento, CA 95812

**Document Details Report
State Clearinghouse Data Base**

SCH# 2014101004
Project Title El Sereno Park Improvement Project
Lead Agency Los Angeles, City of

Type EIR Draft EIR

Description The proposed project consists of the construction and installation of several new recreational facilities at the El Sereno Recreation Center and Park. To accommodate these new recreational facilities, the Clubhouse would be demolished. A basketball court, batting cage, and pathway/jogging path would be constructed within the existing building footprint of the Clubhouse. In addition, fitness equipment, picnic tables, benches, and drinking fountains would be installed in the paved area just north of the Clubhouse. All facilities would be accessible to American Disabilities Act standards. The intent of the proposed project is to increase usable park space in the community.

Lead Agency Contact

Name Paul Davis
Agency City of Los Angeles
Phone 213 202 2611 **Fax**
email
Address 221 N. Figueroa Street, Suite 100
City Los Angeles **State** CA **Zip** 90012

Project Location

County Los Angeles
City Los Angeles, City of
Region
Lat / Long 34° 4' 32.9" N / 118° 10' 55" W
Cross Streets Klamath Street and Richelieu Avenue
Parcel No. 5214018900
Township **Range** **Section** **Base**

Proximity to:

Highways I-710 & I-10
Airports
Railways
Waterways
Schools
Land Use Z: Open Space
 GPD: Open Space

Project Issues Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Caltrans, District 7; Air Resources Board; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission

Date Received 10/29/2015 **Start of Review** 10/29/2015 **End of Review** 12/14/2015

3.0 CORRECTIONS AND ADDITIONS

This chapter of the Final EIR is intended to comply with the requirements of CEQA Guidelines Section 15132, which requires that a Final EIR include the Draft EIR or a revision of the Draft EIR. CEQA Guidelines Section 15088 further recommends that revisions to the Draft EIR be noted as a revision in the Draft EIR or as a separate section of the Final EIR.

In the absence of comments directed at the content or adequacy of the Draft EIR and additional information regarding the proposed project, no text revisions to the Draft EIR are required or proposed.

BIOLOGICAL RESOURCES

BR1 If project construction activities cannot be implemented outside of the nesting season, the applicant shall retain a qualified biologist to perform pre-construction nest surveys to identify active nests within and adjacent to the project area. If the pre-construction survey is conducted early in the nesting season (February 1 - March 15) and nests are discovered, a qualified biologist may remove the nests only after it has been determined that the nest is not active, i.e., the nest does not contain eggs, nor is an adult actively brooding on the nest. Any active nests identified within the project area or within 300 feet of the project area should be marked with a buffer, and the buffer area would need to be avoided by construction activities until a qualified biologist determines that the chicks have fledged. The buffer area shall be 300 feet for non-raptor nests, and 500-feet for raptor nests. If the buffer area cannot be avoided during construction of the project, the project applicant should retain a qualified biologist to monitor the nests on a daily basis during construction to ensure that the nests do not fail as a result of noise generated by the construction. The biological monitor should have the authority to halt construction if the construction activities cause negative effects, such as adults abandoning the nest or chicks falling from the nest.

Enforcement Agency: Department of Recreation and Parks
Monitoring Agency: Department of City Planning, Office of Historic Resources in coordination with the Department of Recreation and Parks
Monitoring Phase: Construction
Monitoring Frequency: Periodic field inspection
Compliance Action: Submission of compliance certification report by project contractor

CULTURAL RESOURCES

CR1 During construction, if buried cultural resources, such as chipped or ground stone, historical artifacts, building foundations, or human bone, are inadvertently discovered during ground disturbing activities, the contractor shall ensure that all work will stop in that area and within 100 feet of the find until a qualified archaeologist can assess the significance of the find and, if necessary, develop appropriate treatment measures in consultation with the City.

Enforcement Agency: Department of Recreation and Parks
Monitoring Agency: Department of City Planning, Office of Historic Resources in coordination with the Department of Recreation and Parks
Monitoring Phase: Construction
Monitoring Frequency: Periodic field inspection
Compliance Action: Submission of compliance certification report by project contractor

CR2 Prior to the start of construction, a qualified paleontologist shall conduct a pre-construction site visit and complete a paleontological assessment memo detailing the results of the site visit, additional research, and a sensitivity analysis in order to assess the relationship between the proposed project location and the Puente Formation. The paleontological assessment shall also include additional mitigation, if deemed necessary.

Enforcement Agency: Department of Recreation and Parks
Monitoring Agency: Department of City Planning, Office of Historic Resources in coordination with the Department of Recreation and Parks
Monitoring Phase: Construction
Monitoring Frequency: Periodic field inspection
Compliance Action: Submission of compliance certification report by project contractor

NOISE AND VIBRATION

- N1** All construction equipment shall be properly maintained and equipped with mufflers and other suitable noise attenuation devices.

Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Periodic field inspection
Compliance Action: Submission of compliance certification report by project contractor

- N2** Contractors shall endeavor to use rubber-tired equipment rather than tracked equipment. Noisy equipment shall be used only when necessary and shall be switched off when not in use.

Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Periodic field inspection
Compliance Action: Submission of compliance certification report by project contractor

- N3** Contractors shall ensure that all stockpiling and vehicle staging areas are located away from noise-sensitive receivers.

Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Periodic field inspection
Compliance Action: Submission of compliance certification report by project contractor

- N4** Contractors shall establish a public liaison for project construction that shall be responsible for addressing public concerns about construction activities, including excessive noise. The liaison shall determine the cause of the concern (e.g., starting too early, bad muffler, etc.) and shall work with LADRP to implement reasonable measures to address the concern.

Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Monitoring Phase: Pre-Construction and Construction
Monitoring Frequency: Prior to commencement of construction and during periodic field inspection
Compliance Action: Appointment of liaison followed by submission of compliance certification report by project contractor

- N5** Contractors shall develop a construction schedule to ensure that the construction would be completed quickly to minimize the time a sensitive receptor will be exposed to construction noise.

Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Periodic field inspection
Compliance Action: Submission of compliance certification report by project contractor