



Friends of Griffith Park

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September 24, 2020

Mayor Eric Garcetti
city of Los Angeles
200 Spring Street
Los Angeles, CA 90012
Via email

RE: Opposition to Griffith Park Aerial Tram

Dear Mayor Garcetti,

Friends of Griffith Park has carefully considered the four proposed Aerial Transit System (ATS) routes, as described by Stantec in the three quarter million dollar feasibility study initiated by the Department of Recreation and Parks (RAP). Three alignments were designed by Stantec, while another route was designed by Warner Brothers. After several meetings with Stantec's public relations firm, Consensus, Friends of Griffith Park strongly opposes all four routes.

The following comments are not comprehensive, but rather initial thoughts on the proposed ATS as we understand it.

A SOLUTION LOOKING FOR A PROBLEM

The stated purpose of the ATS is to reduce traffic and congestion per Dixon Comprehensive Strategies Report (Dixon Report). Instead, it adds another attraction to Griffith Park targeted to tourism. All the while, alternative strategies that will actually reduce traffic problems in tourist-affected areas lie on the shelf collecting dust.

The Stantec Team speaks as though the Dixon Report is a credible study. In fact, Dixon Unlimited is a parking consultant, with a motto, "Your Parking Coach," hardly accredited for solving congestion and traffic issues. While skilled at facilitating the two stakeholder meetings with representatives of the affected communities, their traffic studies were extremely limited and, at least in part, botched. The technical studies themselves lent little, if any, value toward deciding which strategies were placed on the list. More than anything, the report was a "catch all" list of ideas, some proposed by stakeholders, while others were not. The Dixon Report's Executive Summary lists strategies "Stakeholders were supportive of." An aerial tram was not on that list. The findings of the Dixon Report did not, by any stretch of the imagination, legitimize an aerial tram as a community-supported proposal, as has been suggested.

Of the 29 strategies, the ATS is by far the most expensive. Dixon Report lists an Aerial Tram as, "Category: Tourism, Traffic & Congestion; Priority: Medium; Cost: \$\$\$\$."

At the Council Committee approval level, some of the best, least expensive strategies were removed from the list of strategies moving forward to Council, without valid justification (eg, 2.2 Alternate Access Trail). In the June 15, 2018 Joint Report provided by the Chief Legislative Analyst (CLA) and RAP, it was said that, "all property adjacent to the North Beachwood Drive gate is privately owned." This is blatantly inaccurate, and verifiable with just a quick look at ZIMAS. However, based upon this misrepresentation, Strategy 2.2, a pedestrian access to replace the lost access at the closed Beachwood Gate, was flatly denied as a viable option to be pursued.

Several of the 21 Council-approved strategies have gone into the proverbial black hole (eg, 2.1 Electric shuttles), even though touted by RAP and Council District 4. Yet, the ATS was elevated both timewise and with study funding: \$750,000; the first \$600,000 approved on March 6, 2019, and an additional \$150,000 approved by RAP Commission on August 2, 2019.

Stantec has made it clear their job is merely to address questions and comments regarding the ATS itself. By relying

and referencing the Dixon Report, Stantec has falsely validated the ATS as a real viable solution to traffic and congestion problems.

It's common sense that the ATS is by far the most expensive strategy discussed in the Dixon Report, and yet it moves ahead of all others? Nor does it solve the problems of traffic and congestion in tourist-affected areas. While Stantec consultants are very careful in their refusal to say "tourist" and "amusement park ride," there would likely be an increase in net traffic. Certainly, freeway (I-5 and I-134) traffic would increase, as well as traffic along Los Feliz Boulevard. All four ATS options place importance on the ability to provide additional parking for cars, yet no significant accommodations are proposed to connect with mass-transit, such as the Red Line. And, no vehicles are actually removed in total; they are merely redeployed to other areas.

ATS does not fit the stated goals. Was the goal of the Dixon Report from the start more about tourism than resolving traffic? Interestingly, the preamble of the Council Motion for its funding referenced "last year's [2017] record Los Angeles tourism numbers (48.3 million visitors) and the critical role tourism plays in LA's job growth and economy." Perhaps the answer lies there.

Consensus, the public relations firm hired by Stantec to do the public outreach, has been duplicitous in their terminology. One of their consultants accidentally slipped and said "tourism." During the recent town hall, several members of the public submitted questions that included the words "tourist" and "amusement park ride." The consultant reading the questions reworded the questions carefully omitting those offensive words.

In describing Route 3, Consensus refers to the "Zoo Magnet Center," never mentioning that it is the highly respected LAUSD Zoo Magnet School. It was clear to all that Consensus did not want anyone to know that Route 3 would destroy a school. Further, no mention was ever made of the adjacent Griffith Observatory Satellite where the Observatory prepares its acclaimed planetarium programs. Consensus may be pretending it does not exist.

CONFLICT WITH CITY-APPROVED POLICIES

Two significant City-approved documents have much to say about protecting Griffith Park's open space and its delineated wilderness area.

***A Vision for Griffith Park* (2014)**

Selected text represents potential conflicts with the proposed ATS:

- "The defining characteristic of this resource can be traced to the original intent of the Park's benefactor, Colonel Griffith J. Griffith. Colonel Griffith donated his land to the City to provide Angelenos with a natural respite from the surrounding metropolis. He envisioned a park that would be a "safety valve" from urban pressures providing "open space – rustic and available to all." *p.8*
- "Promote and encourage an Urban Wilderness Identity for the entirety of Griffith Park," including: "biodiversity, native species, minimal maintenance required for viability, unstructured aesthetic and a built environment that reflects these characteristics and promotes the sense of place that is characteristic of Griffith Park." *p.7-11*
- "Finally, all structures should be aesthetically compatible with the Park's natural surroundings and wilderness character." *p.41*
- "Power and communication lines and poles are visible throughout the Park and negatively impact the Park environment, scenic views and vistas. To eradicate this negative impact all aboveground utilities should be placed underground. This should be a priority item." *p.48*
- "H. Avoid infringing upon natural areas; 3. Preserve the identified Wilderness area" *p.55*
- "No new parking structures should be introduced within the boundaries of the park." *p.63*
- "1. At this time, there is no clearly identified need for new recreational rides, such as railroads, aerial tramways or funiculars." *p.67*

Historic-Cultural Monument # 942

The Historic-Cultural Monument application introduced Griffith Park as the "largest urban wilderness park in the United States." The application states, "Large portions of this landscape appear to retain integrity dating back to the period of the Gabrielino Indians who were the earliest known inhabitants of the region."

Various built amenities and features were created in Griffith Park for educational and recreational reasons, some of

which are now vested as “Historically Sensitive Resources and Areas.” “The Wilderness Area is a Historically Sensitive Resource,” per the Monument status documentation adopted by the City of Los Angeles on January 27, 2009.

All proposed ATS alignments take routes encroaching upon designated Wilderness Area. In fact 95-100% of each alignment will cross Wilderness Area terrain. The very character of these natural areas will be spoiled by the visual intrusion of a gondola alone, even before one considers the adverse biological impacts. Surrendering Griffith Park as a “wilderness park” would be a colossal cultural loss for Los Angeles.

OUT OF CONTEXT WITH GIFT

Griffith’s gift in 1896 would be dishonored and very well could affect the good intentions of other philanthropists in the future.

In 1910, Colonel Griffith penned a small booklet entitled “*Parks, Boulevards and Playgrounds*.” Griffith strongly reminded the City of his gift of Griffith Park to Los Angeles, after seeing it being systematically destroyed. Griffith noted his conviction that the Park should be a place where families struggling to make ends meet could escape urban pressures and enjoy the healing power of “open space, rustic and available to all.” Now his visionary proclamation of the “healing powers of nature” is supported by notable health organizations, preached by many nature/environmental organizations and backed by science.

Only a few of the City’s parks still retain precious native habitat which is truly the ultimate product of Mother Nature. Griffith Park includes vast acres of rich native Mediterranean habitat, a highly biodiverse ecotype declining faster than the tropical forests of the world. Decisions for protecting Griffith Park must be based upon principles and priorities to protect these natural lands, as Colonel Griffith demanded.

Since his death, the Colonel’s ambitious advocacy for the park has been carried out by Griffith descendants and the family’s charitable trust members. Throughout the decades, attempts to deviate from the Colonel’s vision for Griffith Park, or exploit it, have been met with fights with the City, and sometimes lawsuits. It is incumbent upon our City leadership to respect one of the most significant gifts ever given to the people of Los Angeles.

ENVIRONMENT

Above all, our concern is for the inevitable permanent destruction of open space, habitat, and wildlife such an enormous project would inflict upon Griffith Park. Perhaps our City leaders have forgotten that Griffith Park is the richest natural resource in the entire LA Basin, and that it represents the largest contiguous expanse of open space in the Eastern Santa Monica Mountain Range.

FoGP is well aware of how projects move forward, in apparent full compliance with State-mandated environmental law, yet relegate pristine habitat to rubble. Protecting these remote habitat areas with rare or sensitive flora from damage should be a priority for the managers of these wildlands, L.A.’s Department of Recreation and Parks.

It is inconceivable that placing as many as 24 towers, mostly on chaparral or shrub habitat never stepped upon by other than the park’s wildlife, will not have major consequences on plant communities. Delicate microhabitats along ridgelines are precisely where many of the towers are plotted. These ridgelines are also home to plants such as *Eriastrum sapphirinum* (Sapphire woollystar), *Calochortus plummerae* (Plummer’s mariposa lily), and *Chorizanthe staticoides* (Turkish rugging), not just the more hardy chaparral/shrub species.

The charting of sensitive species, as presented by Stantec to promote the aerial tram to a largely biologically-naive public, is completely irresponsible. First, there is little evidence that Stantec even had a licensed biologist look at these lands at all, as represented during one of the “Pop-up” sessions. Second, the database (California Natural Diversity Database) used to represent sensitive species in Griffith Park is seldom used by biologists working specifically in the area. In fact, more well-known datasets were not used. During the “Open House” Q/A, the Stantec panelist addressing biology admitted not knowing about *iNaturalist*.

That said, very few records of sensitive plant species would show up on any flora dataset since these ridgelines are not open to hikers; no one treads there. The most respected and knowledgeable local ecologists were not consulted because had they been consulted, it would quickly become clear that these tower locations are known to have sensitive flora species, including various *Calochortus* species. In fact, RAP’s own *Griffith Park Wildlife Management Plan* (2014) was overlooked by Stantec.

Another significant risk of disturbing areas around tower locations is the unintentional introduction of invasive species, a huge threat to the delicate balance that nature has achieved on its own. If project study and planning con-

tinues, no doubt rhetoric regarding restoring construction-affected habitat will be part of the typical pro-project narrative. Experts can tell you this is not fully possible.

Regarding wildlife, even more preposterous is Stantec's mapping of the park's wildlife. The American badger, for example, shows up in a small zone of Griffith Park, one species that disappeared from Griffith Park many decades ago. Four bat species listed as sensitive are shown as limited to distinct zones far from the proposed gondola. Yet, we know they fly freely over many areas of the park. We are aware of a peregrine falcon breeding area not shown. And most obvious, the California Endangered Species Act-listed mountain lion species is not on the map, although Stantec verbally acknowledged knowing about Griffith Park's famous mountain lion P-22.

To highlight our concern for various reptiles, *Phrynosoma blainvillii* (Blainville's horned lizard) are present on the ridgelines where towers are proposed. This species is already extremely scarce in Griffith Park. The results of a local genetics study on this species, with Griffith Park being part of the study area, should be known by early next year. Results of this study may give clues to whether subpopulations have become so separated genetically that it is doomed. Few colonies remain in the park, and some herpetologists think it relates to the loss of their main diet, harvester ants, due to introduction of the non-native, invasive Argentine ant. This horned lizard species is listed by California Department of Fish and Wildlife (CDFW) as a "special species of concern."

Along the same lines, the *Aspidoscelis tigris stejnegeri* (San Diegan tiger whiptail lizard) is also listed as a CDFW "special species of concern." We are seeing population declines even as this species is present across large portions of the wild terrain where towers will be erected and maintained. The San Diegan tiger whiptail lizard is considered a vulnerable Southern California subspecies.

Regarding Option 4, adverse impacts on flora and fauna in constructing a cantilevered platform on the very steep slope below the Hollywood Sign are daunting.

In summary, Stantec seems to imply that it's okay to disturb the wilderness area of Griffith Park as long as sensitive flora and fauna species are not near the ATS route, as their inadequate mapping suggests. Besides sensitive-listed species, other flora and fauna of Griffith Park are also important to the long-term health of the park. This is especially true for those which have limited numbers or distributions. Species can be "rare and endangered" in Griffith Park without being rare within the State of California. The "biological analysis" section on the ATS website, along with the uninformed representations made by Stantec staff during their outreach to the public, is unprofessional and misleading salesmanship.

ADVERSE IMPACT ON RECREATION

The impact on current park users during this proposed massive infrastructure undertaking is unimaginable. Large-scale closures would limit access of hikers, equestrians and other park users during the long construction period. Towers erected along both sides of Mulholland Trail (mis-labeled as Mt. Hollywood Trail on all Stantec's topographical maps) would preclude thousands of hikers from pursuing pilgrimages to Mt. Lee. Mulholland Trail is a heavily used trail in close proximity to many of the proposed towers.

Option 4 would also put a damper on hikers going to the top of Mt. Lee during the construction period near the Eileen Getty Trail access. Depending upon the alignment proposed, other trails may also be affected during construction, including the trail near Baby Bell, Mt. Chapel, trails near Amir's Garden, and many others.

The permanent adverse impacts on the user groups are even more concerning. Equestrian traffic from Sunset Ranch to Mt. Hollywood Road along this same stretch would likely need to be eliminated or restricted to only the most experienced riders. Horses are extremely sensitive to peripheral motion, which sometimes leads to a spooking or bolting response. It would be ill-advised for RAP to allow rental or tour horseback riding with gondola cars passing overhead at even fifty feet away. Currently, the plan indicates that the bottom of gondola cars will pass as close as 17 feet above the ground!

Hikers and other passive recreationists have expectations of a natural experience while in Griffith Park. That is its charm and character. Within the more remote and wild interiors of the park, the introduction of a massive mechanical infrastructure with moving parts will be especially unsettling. It's also unclear what amount of sonic disturbance will be introduced, as both the cable lines and gondola cars containing visitors emit noise. At a minimum, the visual blight of this colossal ride across the park's interior presents a significant adverse impact on the quality of the park experience.

SAFETY AND EVACUATION

Many unanswered questions have been asked about the safety of a two-mile ATS over rugged terrain prone to regular brush fires. According to City Park Ranger brush fire data, an average of eight significant brush fires (.25

acre or more) per year occurred over the last three years (2017-2019), a total of 177.5 acres. While a closed-loop tram system might be taking some passengers further from harm's way during a fire event, the opposite direction might be taking them closer to the brush fire. For this reason, it's logical to assume that passengers may be put at risk, with no control over self-escape, a terrifying prospect.

A brush fire event may be one of the reasons an evacuation becomes necessary, but there are others, as well: power failure, unexpected Santa Ana winds, and mechanical or computer failures. At this time, it's unclear how such evacuations would be accomplished, especially considering these gondola cars would be traveling over inaccessible ground and the sheer number of cars. If rescues could even be accomplished by helicopter, it is unclear how long it would take to evacuate riders.

The only urban "mono-cable detachable gondola" in California was completed in 2017 at the Oakland Zoo after many years of an \$80 million construction project. Roughly one-third mile long, it's less than one-sixth the length of proposed options # 1, 2, and 3. The Oakland Zoo gondola has only seven towers versus 21-24 towers for Griffith Park's proposed options # 1, 2, and 3. In 2018, a glitch shut down the Oakland Zoo gondola containing 80 frightened passengers, including one passenger in a wheel chair. These passengers were captive for an additional 30 minutes beyond the expected 4-minute ride. A shut down of such a large system, proposed for Griffith Park, would amplify the terror of those waiting to be rescued.

Our changing climate, with prolonged periods of high temperatures is another concern, especially since high tourist levels occur during the summer months. While we have been told that the gondola cars are completely enclosed, such that a passenger could not toss litter or a cigarette, the question of the existence of active, powered air ventilation remains unanswered. We understand that heat and ventilation are major challenges for gondola operators throughout the world, such as the Maokong Gondola of Taipei.

NEXT STEPS / SUMMARY

Santec has indicated that the financial analysis, along with a safety analysis are next aspects to be evaluated by sub-contractors. Whether these studies might shed light on the advisability of a project or not, continuing with any further facets of the ATS study now represent irresponsible spending of City funds.

The City has fast-forwarded to an economic period of time which differs vastly from two years ago, and has now declared a "fiscal emergency" due to loss of revenue from COVID-19 shut downs. Is an ATS still really feasible now?

In light of this downturn, FoGP respectfully requests an early termination of the Stantec work. The City should cut its losses now. If none of the \$750,000 contract is recoverable, at least the time and energy of City staff will not further drain already reduced staff budgets.

In closing, history does indeed repeat itself. Many previous aerial tram concepts have been proposed for Griffith Park, although with different alignments. What is always the same, though, is the consistent, predictable outrage expressed by the public in response, all for good reasons. This ill-conceived aerial tram feasibility study should be ended now.

Thank you for your consideration.



President, Friends of Griffith Park

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