

# California Native Plant Society

Los Angeles/ Santa Monica Mountains Chapter  
15811 Leadwell St., Van Nuys, CA 91406  
February 14, 2021

Norman Mundy, Environmental Supervisor II  
Los Angeles Bureau of Engineering, Environmental Management Group  
1149 S. Broadway, Suite 600, Mail Stop 939  
Los Angeles, CA 90015  
Via email  
[Norman.Mundy@lacity.org](mailto:Norman.Mundy@lacity.org)

RE: Los Angeles Zoo Vision Plan Draft EIR

Dear Norman Mundy:

On behalf of the California Native Plant Society (CNPS), Los Angeles/Santa Monica Mountains Chapter, I am writing to give input to the LA Zoo Vision Plan Draft EIR (DEIR). Specifically, we are asking that Alternative 1 be adopted by the Zoo and the City as it is the “environmentally superior alternative” called out in the DEIR. Specifically, we do not support the proposed expansion into the California and African planning areas as that would result in the destruction or substantial disturbance of the majority of the native vegetation i.e., 100s of native trees, shrubs and other plants with their resident animals.

We would like to state upfront that our Chapter advocates for preserving all possible open natural space within the City. Such spaces and their resident native flora provide the necessary habitat and food to sustain the native animals we are so lucky to have in our midst. They are also prime centers of carbon sequestration and are part of the wildlife corridors that are key to the safe travel/migration of our urban fauna. The heart of Griffith Park in its wild state creates frontline protection for creatures such as P-22 and their habitat in the Santa Monica Mountains within our City limits. Removing wildland acreage to expand the current Zoo footprint would do irreparable harm.

Coastal sage scrub, chaparral, and oak and black walnut woodlands are a great rarity in our urban ecology. The destruction these natural habitats cannot be undone and will have unintended, adverse ecological consequences for our City’s environmental future. Each native plant is an ecology in and of itself supporting hundreds of plants, animals, and microorganisms. We cannot afford this loss of diversity in view of the climate change pressures we are facing.

We question the thoroughness of the DEIR’s rare plant survey. The Griffith Park Rare Plant Survey conducted by Cooper in 2010 suggests a more robust array of botanical rarity in Griffith Park than is indicated in the DEIR document. The [Griffith Park Wildlife Management Plan](#) submitted to LA City Recreation and Parks in January 2009 provides further documentation on the extensive ecological value of the wildland areas of Griffith Park. And the City’s own study [The Visions for Griffith Park](#) adopted in 2014 calls for the preservation of wildlife, wildlife corridors, native flora and fauna and park biodiversity.

Regarding the modifications proposed for the core Zoo footprint, we urge that all native plants on the City’s Protected Tree list be preserved. We further request that the Zoo not remove any non-native trees that are serving as habitat and refugia for our native fauna such as bats and other mammals, birds, butterflies, bees, wasps, and other insects, reptiles, amphibians, etc. We question whether City agencies and entities involved with urban forestry – the Urban Forestry Division and the City Forester and the Community Forest Advisory Committee (CFAC) – were consulted as the Zoo formulated its Vision Plan



*Dedicated to the preservation of California native flora*

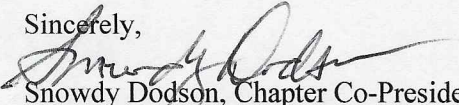




Draft EIR. These are organizations charged with protecting our City's urban forests and should have been in the loop from the very beginning.

The CNPS is a non-profit organization of 10,000 laypersons and professional botanists with 35 statewide chapters. Our mission is to increase the understanding and appreciation of California's native plants and to conserve them in their natural habitats through education, science, advocacy, horticulture, and stewardship. For many years, we have worked tirelessly to protect the native flora of our area and oppose efforts to enable unsustainable development in the region. We recognize that public resources such as the LA Zoo must evolve and grow to stay relevant. However, such change cannot be made if it leads to the loss of the environmental health of our City.

Sincerely,



Snowdy Dodson, Chapter Co-President

Email: [snowdy.dodson@csun.edu](mailto:snowdy.dodson@csun.edu) Ph: 818-782-9346

CC: G. Hans (Friends of Griffith Park)  
Councilmember Nithya Raman  
Mayor Eric Garcetti  
R. Malarich (LA City Forester)  
S. Billik (CFAC)  
M. Shull (LA Rec & Parks)

References:

Cooper, Daniel S. "Rare Plants of Griffith Park" *Fremontia*, 38:4/39:1 Oct. 2010/Jan. 2011, p. 18-24.  
[FremontiaV38.4\\_39.1.pdf \(cnps.org\)](#)

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<https://www.friendsofgriffithpark.org/wp-content/uploads/2016/10/GP-WMP-Final.pdf>

City of Los Angeles. Dept. of Recreation and Parks. "A Vision for Griffith Park : Urban Wilderness Identity" [2010?]  
<https://www.laparks.org/sites/default/files/griffith/pdf/agenda/visionPk.pdf>