



Friends of Griffith Park

P.O. Box 27573
Los Angeles, CA 90027-0573
friendsofgriffithpark.org

February 15, 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

**Re: Los Angeles Zoo Vision Plan Project Draft Environmental Impact Report
SCH# 2019011053**

Public parks are a safety valve of great cities and should be made accessible and attractive, where neither race nor creed nor color should be excluded....Give nature a chance to do her good work and nature will give every person a greater strength in health, strength and mental power.

Griffith J. Griffith

Dear Mr. Mundy,

Friends of Griffith Park, the advocacy group for all of Griffith Park, has carefully reviewed the Los Angeles Zoo Vision Plan Project Draft Environmental Impact Report (DEIR) released in December 2020. We have numerous concerns regarding the scope of the proposed project and the loss of Open Space that would result.

Loss of Open Space / Connectivity

The Zoo, although an independent city department, is located entirely within the boundaries of Griffith Park. It is not “zoo property” as claimed in several places throughout the DEIR. Friends deplores the DEIR’s description of open space as “underutilized and underdeveloped areas” (ES-3 and 2-30). Our Indigenous populations tread lightly on the land and had great respect and reverence for the native habitat; they did not consider it “underutilized.” Griffith J. Griffith, who donated the land to the city for a park, certainly knew the value of open space and nature. (Above quote)

Los Angeles County designated Griffith Park a Significant Ecological Area (SEA) forming “an extensive, relatively undisturbed island of natural vegetation in an urbanized, metropolitan area.” This Open Space currently provides invaluable habitat for the native flora and fauna that call Griffith Park home. Not all wildlife receives the international fame that mountain lion P-22 enjoys; however a large community of wildlife thrive in Griffith Park. In spite of all this, the DEIR proposes the destruction of approximately 25 acres of Open Space.

Regarding the Africa and California planning areas, mostly, “These undeveloped areas serve as a transitional zone between the developed Zoo grounds and native habitats either within the Zoo or in adjacent Griffith Park.” (3.3-11) The DEIR also makes reference to selectively allowing smaller-sized wildlife through borders. Friends’ would encourage the highest level of connectivity up to the extent it would not precipitate conflict or risk disease for any animal, Zoo’s or wildlife. The DEIR

does not make clear what new measures would be in place should California and Africa areas be developed with regard to wildlife connectivity through Zoo boundaries.

Q: What policies are in place which may exclude wildlife from the Zoo grounds?

Q: Under the proposed plan, are measures intended to keep all Griffith Park's wildlife from entering Zoo property, or selectively limit it? How?

Q: What is the Zoo's protocol for handling wildlife, in particular predators, which infringe perimeter fencing?

Note there is razor-wire fencing around some of the Zoo's borders currently.

Q: What is the purpose of the existing razor-wire fencing, as it is a known hazard to wildlife?

Q: What type of perimeter fencing is planned for the proposed project?

Q: Is there a dual system of fencing currently? Or planned under the proposed project?

One of the most egregious proposals is the creation of Condor Canyon in the California area. The proposal calls for blasting a 60-foot deep canyon out of pristine native habitat. The reason for this destruction is, in part, to create a rock climbing activity for children and a visitor center to be used as a party and event facility. One cannot escape the irony of destroying 16.5 acres of native California habitat to create an artificial California. The Department of Recreation and Parks has a portable rock climbing apparatus that they transport to various city parks for events. It is very popular. The Zoo could do something similar in an existing playground area without blasting out a fake canyon.

Q: How can the Zoo justify the irony of destroying native California habitat to create what it calls California?

Q: Who came up with the idea of blasting out a 60-foot deep canyon in order to create a rock climbing activity?

Q: How will the Zoo mitigate impact of the noise of the long period of blasting on picnickers and on equestrians?

Q: Why does a zoo want to focus attention on native California becoming agricultural California by adding a vineyard?

Biological / Sustainability / Environmental

The Executive Summary lists the City's "project objectives," which include: **Conservation:** "Advance conservation efforts by developing facilities and programs that will support conservation actions to protect and grow animal populations and habitats." (ES.3)

Q: How can the City justify "conservation efforts" while not taking actions to protect animals and habitats currently present on this land?

Q: Doesn't protection of habitats start at home, especially native and endangered habitats including the areas the Zoo Vision proposes to destroy?

The implementation of the Zoo Vision Plan calls for the removal of hundreds of mature protected trees that constitute an urban forest resource under the City of Los Angeles Protected Tree Ordinance, coast live oak (*Quercus agrifolia*), California sycamore (*Platanus racemosa*), California bay (*Umbrellularia Californica*) and Southern California black walnut (*Juglans californica*). The Protected Tree Ordinance Amendment was passed by the City to amend the existing Ordinance to expand the definition of "Protected Tree" to include the Mexican elderberry (*Sambucus mexicana*) and toyon (*Heteromeles arbutifolia*). This amendment is now law.

The City passed the ordinance for specific reasons that apply to this Vision Plan:

1. California native trees provide habitat for state or federally protected animal species.
2. California native trees that are located in the Pacific Flyway are important to thousands of migratory birds each spring and fall during migration season.
3. Native trees provide a foundation for a healthy ecosystem.

It is also well known that trees provide the vital function of absorbing the carbon emissions that have led to our current Climate Crisis. Each oak tree sequesters hundreds of pounds of CO₂ per year. Cutting down hundreds of trees in this proposed project will lead to thousands of pounds of CO₂ kept in the atmosphere and contribute greatly to our current Climate Crisis and degrade Los Angeles's air quality. A [study](#) of a project that would take out hundreds of trees for a pipeline detailed the importance of trees in their sequestration of carbon.

Q: How would this Plan mitigate the thousands of pounds of CO₂ kept in our air by destroying hundreds of trees?

Both the California and Africa areas in the Plan would require the removal of 120 coast live oak trees, 60 toyons, 22 black walnut trees and multiple Mexican elderberry trees. These are all protected trees. The destruction of hundreds of trees that provide both a canopy for reducing temperatures, habitat for endangered birds, and a healthy ecosystem is a mind-numbing provision of this Plan.

Q: How is it proper and right to destroy hundreds of plants and trees, the habitat of endangered birds and a healthy ecosystem to add an entertainment feature such as rock climbing to a Zoo that could be placed anywhere else in more urban locations?

Q: How is it proper and right to remove hundreds of trees that provide all the above enhancements to the Zoo?

The Executive Summary list of the Zoo's "project objectives," also includes: ***Environmental Sustainability:*** "Incorporate sustainable design practices into Zoo facilities to ensure resource conservation consistent with City's Sustainable City pLAN, One Water L.A. Plan, and Resilient Los Angeles Plan." (ES.13)

Q: With regard to pLAN's *Carbon and Climate Leadership* provision, how will the Zoo's action in removing "hundreds, or potentially thousands" of trees, plus entire climate-adapted native plant communities, be considered setting a positive example of leadership?

Q: Can the Zoo quantify the loss of carbon sequestration that will be realized over the proposed Vision Plan implementation?

Q: How does the cutting down of hundreds of trees fit in with the City's goals of reducing greenhouse gas emissions by 45% by 2025 under "pLAN?"

Q: In reference to *One Water L.A.*, within the "underutilized" areas of the Zoo property, will the proposed conversion through the removal of native habitats to less native (or no native) plants result in an increased demand for water, whether potable or recycled?

Q: Will the elimination of vast acres of native habitat result in reduced water quality for the Zoo grounds and for the Los Angeles River? If not, at what expense or sacrifice?

Q: In reference to the *Resilient Los Angeles Plan* goal to "Use climate science to develop adaptation strategies consistent with the Paris Climate Agreement," what "climate science" is consistent with the proposed project's removal of "hundreds, or potentially thousands" of trees and the elimination of vast native habitat areas?

While several City initiatives are cited without justification of being compatible or consistent with the proposed plan, conspicuously absent are:

1. *Biodiversity Report (City of Los Angeles, 2018; updated 2020)*: While Zoo staff participated on the Interdepartmental Team and Expert Council of this initiative, its goals and objectives are not referenced in the DEIR.

Q: Why not? Which proposed components of the Zoo Vision are consistent with the stated goals of biodiversity in Los Angeles? Which are not?

Q: What metrics have been applied to gauge biodiversity in the “underutilized” areas of the Zoo property?

Q: What is the expected net biodiversity loss (or gain) that would result in each of the Africa and California areas from the execution of the proposed plan, and what metrics will be used in this determination?

2. *Griffith Park Wildlife Management Plan*: This plan was commissioned by the City of Los Angeles and adopted by the city in 2014.

Q: While the Zoo makes clear the *Vision for Griffith Park* is not applicable to the proposed project, does the Zoo recognize this plan as a guide for best management practices? If not, why not?

3. *30 x 30 Initiative*: Governor Newsom signed an executive order mandating the protection of 30% of California’s open space habitat by the year 2030. The State believes this is achievable solely on public lands. More recently, President Biden signed on to the 30 x 30 initiative.

Q: The destruction of at least 24.5 acres (Africa and California) of native habitat would bring the Zoo’s protected land area to roughly only 5%. How is this mass reduction in open space consistent with such a well-intended goal, 30 x 30, as a way to fight climate change?

Q: As a player in conservation efforts, is the City concerned that the Zoo is sending the wrong message as a leader of conservation efforts?

Guiding principles for sustainability, regularly espoused in some of the initiatives listed above, would favor native vegetation over planted non-natives. However, for example, the removal of scrub and shrublands in the California area in order to plant redwood trees does not fit that forward-looking advice. Scrub/shrub plant systems are under-appreciated for their carbon sequestration potential according to relatively new scientific studies. Removal of these plant communities results in a large loss of both above and below-ground (including mycorrhizal) carbon storage. This carbon storage would likely not be offset by replanted ornamental trees and plants. Also, redwoods struggle in Southern California’s climate, are water-guzzlers, and are sensitive to recycled water due to its high salinity, so precious potable water may be required.

Q: How can this continuous theme of replacing native trees and entire native plant communities throughout the proposed Vision Plan be consistent with the sustainability and biodiversity goals of the City and State?

Biological Assessment and Field Surveys in the Project Areas (Appendix E)

The proposed project is described within geographic “planning areas,” yet plant communities are described (Table 1) within their own types making it difficult to analyze.

Q: Can you please provide a breakout of the coverage areas of plant community types within the proposed project areas in table form?

Q: Can you please provide a breakout of protected native tree species within each project area in table form?

Q: Can you provide the data for all significant floral species by project area, or at least the sensitive species?

Slender mariposa lily (*Calochortus clavatus var. gracilis*) and other sensitive species would not have been seen during a late June survey. (Also see Errata)

Q: Will other flora surveys be conducted to include a wider survey date range for locating sensitive species?

Western gray squirrel is a species under enormous pressure within Griffith Park. Local habitat fragmentation places park populations at critical levels for genetic fitness, and the local population may already be entering the extinction vortex.

Q: With oak woodlands being their prime habitat, why has there not been expert focus on this species? Will there be in the future?

Southern California legless lizard (*Anniella stebbinsi*) is the only reptile mentioned as a California species of special concern. Blainville's Horned Lizard (*Phrynosoma blainvillii*) is also a California species of special concern and occurs in Griffith Park in sandy soils.

Q: Why is this species not mentioned as possible within the project area? Has there not been expert focus to survey this species? Will there be in the future?

San Diegan Tiger Whiptail (*Aspidoscelis tigris stejnegeri*) is found throughout Griffith Park. It, too, is a California species of special concern.

Q: Why is this species not mentioned as possible within the project area? Has there not been expert focus to survey this species? Will there be in the future?

The Zoo is included in the Griffith Park Raptor Survey, but data and reference to it is not included in the DEIR. In its fourth survey year, 2020, the Zoo had five successful raptor nests: two great horned owl, one red-shouldered hawk, one red-tailed hawk, and one Cooper's hawk. A total of eleven birds successfully fledged these five nests in 2020.

Q: Why has this data not been included in the DEIR?

Special status species listed include eight bat species known to be present within the Zoo, and another which is ranked "High" as likely present. (Appendix E Table 2) This is astounding documentation of a high level of biodiversity of these flying, mostly nocturnal, mammals within the Zoo. Yet, even though these are categorized as special status species, the adverse impacts are categorized as "less than significant with mitigation."

It is known that western mastiff bat relies on cliff overhangs and rock crevices for roosting habitat, and the western red bat relies exclusively on foliage for roosting habitat. It is also known that bats utilize building rooftops at Treetops. Sonic surveys have been conducted to determine the presence of these and other special status species of bats. While roosting potential is listed as "High" for six species and "Moderate" for one, most roosting sites and nurseries have not been identified.

Q: Without all roosting areas and nurseries identified, how can it be determined that the adverse impacts are less than significant, considering hundreds of trees will be removed, and topography and infrastructure altered under the proposed plan?

Q: Doesn't the sheer level of bat species diversity elevate the cumulative impact potential to significant? Please explain why or why not?

Q: With such a glut of special status species, and considering the long range of months during which they breed and nurse, how can they all be protected?

Q: Doesn't the increased level of lighting from the proposed new Visitor Centers which will have nighttime events exacerbate their possible demise in the Zoo?

Q: What would be the impact of increased events at Treetops on the bats roosting there in the rooftops?

Regulatory Setting (Appendix E, 5.0)

Most of the pertinent regulatory authorities are listed and described in the DEIR. As this is a City project and the DEIR is being presented by a City Department (Bureau of Engineering) as lead agency, it is especially important that the City's own municipal codes and frameworks are not contravened.

The City General Plan Open Space and Conservation Framework Element (Appendix E Table 4) contains various Policies which raise alarms that the City is not listening to its own advice after City Planning has put tremendous effort into that framework element. In particular, Policies 6.1.2, 6.1.4, 6.1.5, 6.1.7, and Objectives 6.1. Policies 1 and 2 of the Conservation Element regarding Endangered Species, and Policies 1, 2, and 3 regarding Habitats are clearly stated and seem to conflict in spirit with the destruction of both the California and Africa areas. Per the DEIR, both the coast live oak woodlands and scrubland vegetation communities of these areas "would likely be eliminated or substantially altered."

Q: How can each of the above nine Policies and Objective 6.1 be found consistent with the proposed project, specifically within the Africa and California areas?

The Zoo boldly notes its boundaries exempt it from Significant Ecological Area (SEA) even though it is part of Griffith Park and has adjoining natural areas. The above Framework elements recognizes the importance of the County of Los Angeles designated SEA that occur within the City of Los Angeles and directs the city to evaluate the appropriateness of the inclusion of other areas that may exhibit equivalent environmental value. (Policy 6.1.3)

Q: Considering the above stated policy, should the Zoo ignore responsibility for its natural habitat with environmental value (mainly Africa and California areas) which are contiguous to the designated SEA?

As BIO-4 (Appendix E 5.1, 5.2) suggests, efforts will be made to prevent "taking" (legal) of birds during breeding and nesting season as they are protected by various federal and state regulations, raptors especially.

Q: How will this be carried out with hundreds of trees being removed?

Q: How will the current level of raptor nesting activity and breeding productivity within the Zoo be assured during project construction?

Q: How can that nesting productivity be assured post-implementation?

The Technical Report summary for Oak Woodland reports 113 Coast Live Oak trees within just the 7-acre African exhibit area, which also has the highest plant species numbers. It also contains 22 Southern California Black Walnuts, whose main structures were removed by cutting the trunks at the base for brush clearance purposes.

Q: Why was chainsaw-style removal of these protected and highest eco-value trees necessary, rather than the LAFD brush clearance recommended trimming of lower limbs up from the trunk base?

Q: Were permits issued by the City's Urban Forestry Division for each of these 22 removals, and, if so, can evidence be provided?

Q: Do these removals in advance of the survey and CEQA process reduce the threshold of significance, especially considering this species is a CRPR 4.2 tree? Why or why not?

Economic Equity

Col. Griffith's goal when he donated the land to the city for the park was that it should be free. Getting out into nature was to be an escape valve for the rapidly growing population of the city. Visiting the Zoo with a family of four is already fairly expensive. The proposed amenities such as the aerial tram, funicular, rock climbing, and swim with elephants will put an additional stress on a low-income family's finances. In addition, families must now pay to park in the Zoo's lot unless they are able to locate parking in the free section whose gates are sometimes locked.

Q: How many parking spaces will be free?

Q: How many spaces will have a fee?

Q: How much will the parking fee be?

Q: How many days a year will parking fees be charged?

The Zoo proposes both a funicular and an aerial tram ostensibly to provide ADA access; however they already have trams to fill that need. Aerial trams and funiculars are extremely expensive to build and increase GHG emissions. These proposed additions are better described as amusement park rides for generating revenue.

Q: What will the fee be to ride the aerial tram?

Q: Will there be special reduced or free fares for low income families?

Q: How does one "swim with elephants" in the Asia area, and is there an extra charge for this? (Fig. 2-9)

A project of this magnitude will be enormously expensive and as with other public projects, unless there are multiple, generous benefactors, the expense will be borne by the users of the Zoo and taxpayers. City funding is not always adequate. We understand the Zoo's need to generate revenue. Providing the animals with proper diets, state-of-the-art medical care, and trained staff is expensive.

There is a proposal to set aside a certain percentage of the parking fee (previously free to all) for the disadvantaged. While this is a noble idea, how exactly would this be implemented?

Q: Is there a plan to set admission fees at levels most families can afford?

Q: Will there be a sizable number of free admission days each month to make up for higher prices that the disadvantaged can't afford?

Realignment of Crystal Springs Dr.

The current trail between the Zoo Magnet, and golf course used by runners, hikers and equestrians would be heavily impacted if the realignment is implemented as proposed in the DEIR. Twenty years ago when the Zoo entrance was redesigned, a popular runner/hiker trail was eliminated. We want to ensure these user groups aren't displaced again.

Q: Will there be a wide landscaped buffer to separate hikers and equestrians on the trail from the traffic on the road?

Q: What mitigations will be in place to keep traffic from speeding, besides the possible signal light and traffic circle?

The Griffith Observatory Satellite, currently located in the parking lot near the Zoo Magnet school, is not identified on any maps nor is it mentioned in the DEIR.

Q: What will happen to the Griffith Observatory Satellite under the proposed plan?

Signage

Little information is provided regarding signage, and the level of significance varies from “significant and unavoidable” to “less than significant” (Table 3.15-5). There are many questions to be addressed, relating to the specifics of signage within land zoned Open Space.

Regarding signage at the zoo entry:

Q: How many digital displays are planned?

Q: What size? Relative to the billboards and support structures at LA Live will these be smaller or larger?

Q: Will they be on all the time or will they be on a schedule so they operate during regular zoo hours?

Q: What type of digital signs will be used? Static images? Changeable static images? Moving/video imagery?

Q: What is the maximum image brightness you anticipate in lumens, and at what temperature?

Q: How much electrical power is needed to operate? Renewable energy?

Q: Is the content limited to wayfinding messages?

Q: Will donor related, advertising messages or logos be incorporated with the zoo ID, and will it include messages from sponsors or other businesses?

Q: Will they be on during evening special events?

Q: Who will control content?

Q: Digital billboards are a known distracted driving hazard, so will signage at the Zoo entrance be visible from either Interstate 5 or State Route 134?

Regarding wayfinding signage outside zoo boundaries:

Q: Will there be digital wayfinding signs outside zoo boundaries? If yes how many and at how many locations?

Q: What is the anticipated size of the units?

Q: Are the digital units permanently installed or are they movable? If permanently installed what will the support structure be fabricated of?

Q: How will they be built?

Q: How much electrical power is needed to operate? Renewable energy?

Q: Will they be on all the time or will they be on a schedule so they operate during regular zoo hours?

Q: Note that currently video images are only allowed in certain sign districts. LA Sign code does not allow for continuous moving images on a general basis. What type of digital signs will be used? Static images? Changeable static images? Moving/video imagery?

Q: Who controls content?

Q: What is the maximum image brightness you anticipate in lumens? What temperature?

Q: Is all content limited to wayfinding messages?

Q: Will donor related, logos, or advertising messages be incorporated with the wayfinding?

Q: Will they be on during evening special events?

Q: Digital billboards are a known distracted driving hazard, so will any wayfinding signage outside the Zoo be visible from either Interstate 5 or State Route 134?

Significant and Unavoidable Impacts

Aesthetics and Visual Resources is one of the areas identified as having Significant and Unavoidable Impacts. The proposed multi-story parking garage near the Zoo entrance would be highly visible from Zoo Drive and Western Heritage Way, and parts of the 5/134 interchange. This structure would also be highly visible to all hikers along trails in the northeast section of the Park. Most users come to the Park to escape from the stress of living in a big city, but this protruding structure would impinge on their commune with nature. Over 12,000 people signed petitions opposing an ill-conceived 2005 Griffith Park Master Plan which included parking structures scattered throughout the Park. As a shared resource with all park patrons, the Zoo's proposed parking structure is a violation of the 2014 city-approved Vision for Griffith Park.

Q: How will the Zoo decrease the use of private vehicles and increase the use of public transportation?

Q: During the "presentation" alternatives were discussed, eliminating more vehicles and using other means of transportation, and yet, how is this addition of parking and a parking garage cutting down the numbers of vehicles?

Accommodating more vehicles in the park is contrary to attitudes regarding cars in parks throughout the country. All National Parks that have seen an increase in visitors are developing transportation systems to reduce or eliminate vehicles in parks and move people around the park on shuttles. Griffith Park has seen a large increase in visitors too; however the Department of Recreation and Parks is currently initiating a park-wide shuttle service to move people around the park. Instead of moving forward with an environmentally sound plan to reduce the number of vehicles and their pollutants, the Zoo seems to be moving backward to the 1950s when the car was king in Los Angeles.

This is an impact that is easily avoided. Don't build the parking structure. When the Zoo redesigned its parking lot to make its surface water permeable, they received a variance from the City allowing them to provide 300 fewer parking spaces than required by law. (ZA 2009-3737(ZV) The Zoo claimed that it did not need those spaces. During the Zoo's presentation to the Griffith Park Advisory Board, Darryl Pon stated that the Zoo did not need off-site parking.

The adoption of Alternative 1 Reduced Project would slow the anticipated growth in visitation by having fewer attractions and events. Thus additional parking spaces in a multi-story parking lot would not be necessary.

Q: If there is no stated need for more parking, why is the Zoo proposing to build a multi-story parking structure?

Transportation is the second element identified as Significant and Unavoidable. Again the slower growth in visitation anticipated by having fewer attractions and events under Alternative 1 Reduced Project would provide substantial mitigation for the impacts on traffic by reducing the number of cars coming to the site.

Q: How will the Zoo increase public transportation to the Zoo?

Q: Will the Zoo add a direct shuttle from the Metro Red Line and nearby MetroLink hubs to the Zoo?

Friends is concerned about the amount of land proposed to be used for new visitor centers. In its description of the Zoo as a world-class destination the DEIR touts the new visitor centers. “Expanded special event and conference spaces would support a wide range of events to promote and expand public use and enjoyment of the Zoo.” Animals are listed last. The pie chart describing existing Zoo land use states that 55 acres are currently used for visitor serving and animal habitats. The proposed use pie chart shows 79 acres for visitor services and animal habitat. When we inquired about the lumping together of visitor services and animal habitat, two unrelated concepts, we were told that final design of the new areas was not completed so they couldn’t tell us exactly how many acres for each category. That might possibly be true for the proposed project, but it is disingenuous for the Zoo to claim that they don’t know how many acres are presently dedicated to visitor services. Although a zoo is a permitted use in an area zoned Open Space, operating an events and conference center is not.

Q: What do the pie charts look like if animal habitat and visitor serving are counted separately?

Q: Is the Zoo shifting its focus from a zoo to events facility?

Q: Will a change in usage require a zoning change? Why or why not?

The Zoo is planning a substantial increase of revenue-generating activities at night with private events. All of these events would require substantial nighttime lighting which was declared to be associated with Potentially Significant Impacts, per the Initial Study. It will also significantly increase nighttime traffic around the Zoo. Many of the Zoo’s animals, in addition to the park’s surrounding native wildlife, are nocturnal and become active when it is dark and quiet. The event venues will also have amplified music. Sonic and light disturbance should be carefully considered. A lot of this is new science, so using the same metrics for environmental review from past projects will not suffice. To make it even more difficult, sonic and light disturbance has been shown to be highly species-specific. The Initial Study noted that lighting and noise could disturb “special status species.” The DEIR states, lighting may “potentially interfere with resident and migratory feeding, resting, or reproductive activities,” (Appendix E, p. 70). Certainly Alternative 1 would greatly mitigate the lighting and sonic disturbance concerns.

Q: How can lighting be determined as “less than significant” per the DEIR, even with the best mitigation measures put in place?

Q: What will be the impact of all the added light and noise on the Zoo’s own animals?

“California and Africa planning areas constructed on the Zoo’s higher elevations would support structures with night lighting that could be seen from distant vistas.” (3.1.39)

Q: What experts have been consulted on light disturbance, considering the surrounding high quality wildlife habitat at this portion of Griffith Park, and the many species of bats, especially? If none, why?

There is another animal that has been ignored by the DEIR. It is neither a Zoo animal nor a wild animal. It is the horse. Griffith Park has, since its inception, been known for its fine equestrian trails. Riders enjoy the peace and quiet of Griffith Park as well as the fine views from the trails. Horses are highly sensitive animals, *Sensitive Receptors*. They have a tendency to bolt when they hear loud

noises such as construction noise or blasting noise, unless specifically trained to tolerate certain noises.

Q: How will you mitigate the loud noises heard by horses particularly on the Skyline Trail, Condor Trail, Oak Canyon Trail, North Trail, and Mineral Wells Trail?

The increase in the number of cafes and food service areas has the potential to attract an increased number of rats.

Q: How will the Zoo deter rats who are attracted to food waste without using bait boxes full of toxic rodenticides that kill all wildlife, not just rats, as it moves its way up the food chain?

Lack of Outreach

The Zoo claimed they had engaged in robust public outreach. There is little record of the Zoo going beyond their membership/donor list and a very narrow geographic radius in order to truly reach a cross section of the public interested in both the Zoo and Griffith Park. This is a missed opportunity since the Zoo could have reached a wider geographic radius to include underserved communities who do visit the Zoo, but pay the single day ticket price. Middle class, upper class and other patron sectors were also missed by not publicizing the proposed Zoo Vision Plan throughout a countywide area. There was little formal outreach beyond a few local organizations.

Zoo consultants said they sent post cards announcing the Scoping Meeting to all residences within a 1.5 mile radius of the Zoo. However about 60% of that radius is Griffith Park, which has no residences. Across the Los Angeles River to the east is an industrial area of Glendale, again with no residences. Standard practice for notification proposed projects within Griffith Park was not followed.

Q: Why wasn't there notification to all residents within 500 feet of the boundary of Griffith Park, which would have included nearby stakeholders within Los Feliz, the Oaks, Beachwood, Hollywoodland, and Lake Hollywood?

After Friends saw the initial presentation, we went to the Griffith Superintendent to ask his opinion of the Zoo's Vision Plan. He had never heard of it.

Q: How can the Zoo claim to have a robust public outreach program when the nearest neighbor and landlord, the Department of Recreation and Parks, was not informed of the plan?

Q: When was Dr. Ed Krupp of the Griffith Observatory consulted on the status of the Griffith Observatory Satellite currently located in the Zoo parking lot?

Q: What discussions have been held with the Zoo's close neighbor, the Autry Museum? How will the Autry be able to continue free parking if increasing numbers of Zoo patrons opt to avoid the Zoo's paid parking by parking at the Autry?

Errata:

(BRTR 3) "*Los Angeles Municipal Code, including the Tree Preservation Ordinance*"

Correction: The 2006 "Protected Tree Ordinance" (amended in 2021).

(3.6-12) "scrub oak (*Quercus arbutifolia*) specimens are present along the western-facing slope and atop the ridgeline."

Scrub oak is a valuable and less plentiful tree species in Griffith Park. Please correct to the most likely species name which would be, *Quercus berberidifolia* (not arbutifolia).

(Appendix E Biological, Table 2) “*Calochortus clavatus* var. *gracilis*; Low Suitable habitat present; known in region from mountains 10 km to north.”

Correction: This species is present in Griffith Park, known within 1.5 km of the Zoo.

Summary - Alternative 1 Reduced Project

Friends of Griffith Park highly recommends that the Zoo selects Alternative 1 Reduced Project. Alternative 1 would eliminate the need to destroy acres of native habitat and hundreds of protected trees. The Zoo could concentrate on superior habitats for a smaller number of select species. This will allow the Zoo to modernize its animal exhibit space within the current developed footprint of the Zoo. The Zoo knows how to do this. They have already created naturalistic habitats in the Chimpanzees of the Mahale Mountains and in the Elephants of Asia habitat spaces. The Zoo would still have an event space that it can use to generate revenue and achieve their mission without imposing the worst adverse impacts, especially those biological.

The Zoo should be commended for its storm water recapture plans that conserve water, and use of solar panels that generate energy for Zoo operations. These plans should be implemented in whichever alternative the Zoo adopts.

The proposed Zoo Vision Plan is an extraordinarily ambitious and unrealistic one. The Zoo would be better served by selecting a plan that it can execute and still remain financially sound while properly caring for the animals and holding dear its conservation agenda. Only in doing so can it become a world-class facility.

Sincerely,



Gerry Hans
President

About Friends of Griffith Park:

Friends of Griffith Park (FoGP) is a California non-profit 501(c) (3) dedicated to preserving and protecting Griffith Park's natural habitat, biodiversity, and historic features, for current and future generations. FoGP is committed to ensuring that Griffith Park, a public park and Los Angeles' largest Historic-Cultural Monument, remain open, natural, and free to all citizens of Los Angeles.