



**Friends of Griffith Park**

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October 12, 2021

Councilmembers John Lee (Chair), Mike Bonin, Mark Ridley-Thomas  
Arts, Parks, Health, Education, and Neighborhoods Committee  
Los Angeles City Council

**Re: Los Angeles Zoo CF 21-0828; Support for Alternative 1**

Honorable Chair John Lee:

Friends of Griffith Park (FoGP) is a non-profit chartered for advocacy for all of Griffith Park, including the Los Angeles Zoo. Our clearly stated opposition to the proposed Zoo Vision Plan (Project) is founded on the Zoo's proposed destruction of many acres of native habitat, including woodlands containing 120 coast live oaks, 60 toyons, and 22 California black walnut trees, all of which are City of Los Angeles Protected Trees/shrubs. An alliance of tree species may also be considered within the rare category, as well as some flora and fauna species. For these and other substantiated reasons, Alternative 1 should be carefully considered and selected by this Council Committee.

CEQA guidelines require the Environmental Impact Report (EIR) analysis to identify the Environmentally Superior Alternative — an alternative containing the fewest adverse impacts and greatest benefits. Alternative 1 was declared to be the Environmentally Superior Alternative, over the proposed Project and over Alternative 2. In this regard, FoGP merely joins the best choice already stated in the EIR. ([Executive Summary](#))

**POSITION SUMMARY TO SUPPORT ALTERNATIVE 1:**

The following summary argues that little is lost by the Zoo in achieving its goals under Alternative 1. Yet, so much would be lost under the Project by destroying nearly all the remaining native habitat within the Zoo's borders, which mostly comprises the native habitat within the Africa Project Area and the California Project Area.

The Zoo Vision Plan EIR refers to this native habitat as “*underutilized and underdeveloped areas of the Zoo*” ([Executive Summary](#) and [3.3 Biological](#)). Friends of Griffith Park vehemently disagrees with this assertion and characterization from the perspective of conservation and biodiversity. This is precisely the case when one considers the protections afforded to components of this natural habitat and rarity rankings, just as the Los Angeles community begins to experience explosive climate change, drought, and water usage concerns.

## The Africa Planning Area

**WHAT WILL BE LOST:** The Africa Planning Area includes approximately six acres of dense vegetation corresponding to coast live oak woodland. The tree/shrub species mix also includes Southern California black walnut, toyon, and Mexican elderberry, all protected under the Los Angeles Protected Tree/Shrub Ordinance. The terrain of this area is hillside with over 20 percent grade ([Appendix E](#)).

The tree/shrub community proposed to be “*eliminated or substantially altered*” in the Africa Planning Area includes City of Los Angeles Protected Tree/Shrub Species ([Appendix I](#)):

*California live oak (Quercus agrifolia) 113*  
*Southern California black walnut (Juglans californica var. californica) 22*  
*Toyon (Heteromeles arbutifolia) 45*  
*Mexican elderberry (Sambucus Mexicana) 21*

### **TOTAL CITY PROTECTED TREES/SHRUBS LOST = 201**

The 22 Southern California black walnut trees included above are re-sprouting from tree stumps cut for “fire management.”

Comments submitted by FoGP inquired why they were cut, under whose authority, and whether permits had been issued. The City’s ambiguous response states, “*brush clearance activities are carried out by Zoo groundskeeper staff in coordination with the LAFD.*” **This deserves more clarification.** Since the response did not say they obtained a permit to cut the protected trees, the logical assumption is no permit was authorized and therefore the trees were cut down in violation of the Protected Tree Ordinance (2006).

In answering FoGP’s question regarding whether the pre-EIR cutting reduced the threshold of significance, the City replied, “*Project’s impacts to the 22 California black walnut tree stumps would be mitigated to the same level..*” And, “*Therefore, the loss of these trees does not reduce the threshold of significance for the analyses within the EIR.*”

Now, consider another comment submitted by California Department of Fish and Wildlife (CDFW), “*To determine the rarity ranking of vegetation communities on the Project site, the MCV (Manual of California Vegetation) alliance/association community names should be provided as CDFW only tracks rare natural communities using this classification system. This would allow CDFW to appropriately comment on potential impacts to sensitive plants and vegetation communities.*” The City’s response to this comment is in sharp contrast to the reply to FoGP’s comment. The City pivots in its reply saying that both habitat areas “*have all been subject to some degree of past disturbance such as vegetation clearing for fire management. Similarly, the majority of black walnuts are in various stage of resprouting from past fire management activities.*”

The City has taken two conflicting positions regarding treating mitigation for the 22 Southern California black walnut trees which were cut down within the Zoo's borders, saying they should be fully mitigated as trees, yet attempting to dismiss them as part of a plant community. Indeed, an alliance comprised of Southern California black walnut with coast live oak is listed under "[Sensitive Natural Communities](#)." For this alliance, both Global rarity and State rarity show checked boxes. The mitigation for the loss of "Sensitive Natural Community" would be much more difficult to reduce to a level below significant, and so it seems the tree alliance is being misleadingly understated. Mitigation for lost Sensitive Natural Communities is done on an area ratio basis, rather than a tree ratio replacement basis, making it more expensive and more difficult.

The [Findings of Fact and Statement of Overriding Considerations](#) declares that the Project would result in no reasonably foreseeable impacts to biological resources relating to natural communities, and defers further biological surveys to a later date, at 30% plan design. We disagree with the finding and the deferral, as they relate to the walnut/oak alliance. This should have been addressed in the EIR.

### The California Planning Area

**WHAT WILL BE LOST:** The California Planning Area includes approximately 16.1 acres of undeveloped habitat, much of which is laurel sumac shrubland, but also coast live oak woodland.

The affected tree/shrub community in the California Planning Area includes these City of Los Angeles Protected Tree/Shrub Species ([Appendix I](#)):

*California live oak (Quercus agrifolia) 7*  
*Toyon (Heteromeles arbutifolia) 15*  
*Mexican elderberry (Sambucus Mexicana) 4*

**TOTAL CITY PROTECTED TREES/SHRUBS LOST = 26**

**OTHER FLORA AND FAUNA WILL BE LOST IN BOTH PLANNING AREAS:** Notable sensitive flora in the California Planning Area includes Nevin's barberry (*Berberis nevinii*). Nevin's barberry is a federally and state-listed endangered shrub, endemic to only a few Southern California counties. No exact count was determined by EIR project surveys, but at least 11 stands were noted in the California Planning Area. Other species here include scrub oak, lemonadeberry, California sagebrush, and big-pod ceanothus. According to the EIR, the Africa Planning Area "*hosts the highest observed species diversity of the native habitats of the Zoo, with 54 plant species being observed.*" ([3.3 Biological](#))

The EIR states that 17 sensitive or special-status plant and wildlife species are either known to be present or have a moderate to high potential to be present based upon

historical records. The reconnaissance survey and an initial rare plant survey were certainly not adequate to document all rare and special status species. Calochortus species, Hubby's phacelia, and others are likely to be found within the California Planning Area and the Africa Planning Area.

Fauna species would likely include San Diego woodrat, legless lizard, and multiple bat species. ([Appendix E](#)) Despite FoGP comments entered, there is complete denial that Blainville's horned lizard and the San Diegan tiger whiptail lizard, both species of special concern, could be present on Zoo property or anywhere within Griffith Park, despite obvious public documentation, lay knowledge, and information provided by FoGP. Also, there is no acknowledgement of Western gray squirrel populations being threatened within the region and within Griffith Park, despite the information FoGP provided in its comment and readily available results of genetic work proving otherwise.

**WHAT WILL BE LOST IN GRIFFITH PARK ITSELF:** Shockingly, with the proposed Project, *“a fuel buffer could result in up to 6 acres of disturbance or loss of native chaparral and oak woodland habitat within Griffith Park.”* ([3.17 Wildfire](#)) This is a well-hidden nugget in the EIR never discussed during any of the Zoo's interviews or outreach presentations. This alone should be a reason for Alternative 1, since drastic habitat impacts should not be allowed upon Recreations and Parks (RAP) land. FoGP considers the habitat in the RAP Griffith Park to be as important as that within the Zoo's borders. Some may recall the major push-back in the late-90s when the Zoo wanted all of Mineral Wells Picnic Grounds, not just an acre or two, for the veterinary facility.

Under the proposed Zoo Vision Plan, **native habitat is lost on both sides**. Ironically, leaving the oak woodland alone in the Africa Planning Area may be a best management practice solution to protect the Zoo from wildfires. According to US Forest Service, coast live oak is exceptionally fire resistant. Some informed fire authorities even suggest that coast live oak be placed in strategic areas in order to achieve the greatest amount of fire protection.

## **LITTLE IS LOST WITH ALTERNATIVE 1 vs. FULL PROJECT**

Fortunately, with the reduced project Alternative 1, little is lost toward the Zoo Vision's 14 Project Goals. Alternative 1, per the EIR, *“would reduce environmental impacts identified in the EIR associated with the development and loss of natural resources within these areas (e.g., visual resources, native habitat, sensitive plant species, protected trees).”* ([4.0 Alternatives](#)) And as stated previously, is the “Environmentally Superior Alternative,” according to the EIR.

**Most goals of the proposed Project would be fulfilled under Alternative 1. Here is a short summary of the Project Goals showing whether each would be accomplished under Alternative 1 per the EIR. The bolded short answer, “Yes, No, or Partially” are**

**the answers given in the EIR. FoGP comments are [inserted] after each. We would argue that many labelled “Partially” should actually be “Yes”:**

***Animal Welfare and Care:*** **Yes**, improvements and upgrades would be executed, but inside the current confines of the current developed Zoo areas. [We agree]

***World Class Destination:*** **Yes**, but within the current footprint. [We agree, and the LA Zoo is already one of the top ten largest zoos in the United States.]

***Conservation:*** **Partially**, since there may be less revenue with lower visitation. [Destroying native habitat areas is inconsistent with any principle of conservation. Donations and memberships may be more critical than paid admission for conservation funding. Fewer visitations versus the full project would mean less traffic impacts in Griffith Park and less need for the heavily-opposed parking structure.]

***Learning and Education:*** **Partially**, since there is less “animal space and educational facilities” to support engagement. [We are confident there is plenty outdoor classroom space within its current footprint.]

***Visitor-serving Amenities:*** **Partially**, with fewer “shops and plaza.” These “amenities” are decreased due to reduced footprint. [Reduced level of commercial zones within Griffith Park is a positive aspect of Alternative 1. Much of the expansion into habitat areas is targeted to amenities and attractions, rather than animal care.]

***Efficient Circulation System:*** **No**. Without Condor Canyon, “an internal loop circulation system” would not be developed. The current loop would remain, but with some improvements. The funicular would be eliminated. [Blasting and excavating through Condor Canyon into 60 feet deep bedrock is a huge undertaking. Not having the California Visitor Center, proposed of “up to 73,800 sf with 22,400 sf food service facilities,” will allow the Zoo to focus on its stated mission rather than enter the convention and facility rental business with nighttime events.]

***Multi-modal Access:*** **Yes**. Improvements to multi-modal would be made, although less than those under of Alternative 2. However, the City considers Alternative 2 extremely difficult in terms of economic feasibility. [This area of Los Angeles is highly challenged in its transportation options. This is absolutely another reason for less ambitious growth versus the proposed project’s 66.6 percent growth in admissions.]

***Increase and Modernize Zoo Exhibit Space:*** **Partially**, but only because, Alternative 1 “would not include the expanded exhibits within the California and Africa planning areas.” [This is a minor sacrifice in order to save these valuable habitat areas. We would argue “Yes” since much of the existing space will be modernized even under Alternative 1.]

**Accessibility (within Zoo): Partially**, since the funicular would not be built. Improvements to pathways would be made and the aerial tram would still be implemented. [The elimination of the funicular is a positive. It is more an amusement park attraction and a means to accommodate evening events at the California Visitor Center which would not occur under Alternative 1. Unfortunately, the aerial tram is also an amusement attraction, but will also serve to improve access, particularly ADA visitors. This should be “**Yes**” considering the aerial tram.]

**Operational Excellence: Partially**, since, otherwise, *“the internal loop circulation system would improve emergency access, and the underdeveloped areas would not enhance overall design and operations.”* [While this notation in the EIR is extremely vague, there are significant off-setting advantages of saving undeveloped natural areas which are cherished by visitors. Spending huge sums excavating through Condor Canyon is not necessary since a complete circulation loop with ground tram already exists. This answer should be “**Yes.**”]

**Immersive Visitor Experience: Partially**, *“but would not utilize all the Zoo property to maximize immersive experiences for visitors.”* [This is a good thing. Retaining those “underutilized” natural habitat areas will be greatly appreciated by visitors who consider natural habitat conservation important. This should be answered “**Yes.**”]

**Visual Appearance: Partially**, *“...this alternative would not include full development of the California planning area, including the hilltop Yosemite lodge-style California Visitor Center and active hillside vineyards, with sweeping views of the Zoo.”* [It is hard to understand the irony of turning natural California habitat into water-thirty vineyards and call it California. This should be answered “**Yes.**”]

**Capital Improvements: Yes**, similar improvements would be made in including stormwater, solar, etc. [We agree]

**Environmental Sustainability: Yes**, the same sustainable design features would be implemented. [We agree]

## **LACK OF JUSTIFICATION FOR TAKING NATIVE HABITAT**

Even if a “zoo animals first” rationale is taken, there’s little justification for sacrificing the valuable native habitat acreage of the Africa Planning Area and the California Planning Area. The EIR says, native habitat communities would likely be “eliminated or substantially altered” [EIR 3.3-49] in the Africa and California areas.

If you dig deep into the numbers in the EIR to answer questions which aren’t exactly transparent, **only 35% of the undeveloped natural habitat would be devoted to animal care purposes** within the two expanded areas.

Here is the detail of an assessment in finding the percentage of the undeveloped habitat in the Africa and California areas to be used for zoo animal care purposes under the proposed plan:

### **CALIFORNIA PLANNING AREA:**

- There are 16.1 acres of undeveloped habitat, plus 4.5 acres of developed aviary.[EIR 3.6-12 & 2.0-43]
- 164,700 sq ft of animal space improvement [EIR 2.0-44] equals 3.8 acres, so 24% of undeveloped habitat will go to animal space and care, if the full plan is executed.
- The current 4.5 acres of developed aviary can still be redeveloped under the full proposed plan or Alternative 1.

### **AFRICA PLANNING AREA:**

- Within this area, there are 6 acres of dense oak woodland, within the 7 acres of undeveloped land. Another 16 acres is already developed as animal space. [EIR 2.0-54]
- New animal space is 190,600 sq ft [EIR 2.0-55] equals 4.4 acres, so that is 63% of the 7 acres now undeveloped. (Conversion to expansive rangeland with 360° view from the large planned Visitor Center and Restaurant.)
- The currently developed 16 acres of animal space can be redeveloped under the full proposed plan or Alternative 1.

**Combining these for a TOTAL of undeveloped habitat area turned into animal space and care = 35%**

### **SUMMARY**

The proposed Zoo Vision Plan is profoundly inconsistent with City environmental priorities. The Project radically turns its back on Los Angeles's *Sustainable City Plan*, and snubs the *30 x 30 Initiative*, along with the *Biodiversity work by the Department of Sanitation and Environment*. FoGP supports EIR Alternative 1, which will avoid developing approximately 23 acres of native wildlands. As illustrated above in detail, few of the stated goals of the Plan are sacrificed in doing so.

The Zoo Vision Plan's obsession for explosive growth (66.6% increase) also falls short in coping with the resultant increased volumes of vehicles coming into the park. While Alternative 2 is listed in the EIR as a way to reduce the resultant vehicle count increase, the Zoo admits at the same time that is not feasible due to costs and nearly impossible logistics. The resultant traffic impacts will not just negatively impact the Zoo; these impacts

will affect every person who visits Griffith Park for its many recreational opportunities. It will also increase the regular and dangerous gridlocks on the northbound I-5 Zoo exit we already witness regularly. While Alternative 1 does not solve this problem, it does offer a slight compromise to reduce vehicle count with a lower visitor volume, and possibly reduce the need for a parking structure in the future.

Alternative 1 also reduces construction expenses, and thus financial risks to the City. Note that the current 2021-22 Zoo budget, at around \$25 million, relies on the City's General Fund as its largest source of revenue, at \$11.6 million! This is not the first time the City has propped up the Zoo during challenging times. If the current pandemic tells us anything, it's that uncertainty will persist into the future, just like our changing climate is exerting volatility into our lives!

Other risks to the City are embedded in fundamental zoo visitation trends, with a global re-thinking of maintaining wild animals for display. Zoos are falling in popularity with a younger generation of parents. Other trends are noted in The New York Times' recent opinion, [Modern Zoos Are Not Worth the Moral Cost](#), such as polling that shows only a very low percentage visit zoos to "learn about animals."

Friends of Griffith Park is pleased that the LA Zoo gives high priority to "Animal Welfare and Care," and with Alternative 1, the Zoo will achieve this excellence and continues to meet AZA standards. The EIR also clearly states that the Zoo can become a "World-class Destination" while meeting many other project goals with Alternative 1. The "Environmentally Superior Alternative," Alternative 1, is the best choice for Los Angeles.

Sincerely,



Gerry Hans  
President

cc: Mayor Garcetti, Councilmember Nithya Raman, Mike Shull (RAP), Denise Verret (Zoo), Stefanie Smith (RAP), RAP Commissioners, and other staff members.

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.*