



Friends of Griffith Park

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

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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

Re: LA Zoo Vision Plan Focused Recirculated EIR Comments

Mr. Mundy,

Friends of Griffith Park (FoGP) has previously provided comments on the Draft EIR and the Final EIR. We take our advocacy responsibility seriously, to protect the gift of this urban wilderness to the benefit of future generations.

POSITION SUMMARY REGARDING ALTERNATIVE 1.5

FoGP supports nearly all the improvements made in Alternative 1.5, as compared to the previously proposed Zoo Vision Plan (Project). However, we strongly oppose the excavation of Condor Canyon and development of the California Planning Area, as described in the Focused, Recirculated EIR (FREIR). We're also puzzled that the event space from the repurposed Angela Collier Garden Event Center is now being so proactively articulated in a larger form despite little mention in the EIR.

This letter provides factual information, to the best it was accurately presented to us, via the FREIR, with the hope of finding a compromise the entire City will embrace, while still achieving the Zoo's high-priority goals. Our points are largely themed toward protecting habitat, and biodiversity, but also aesthetics, traffic, and more.

ACKNOWLEDGEMENT OF POSITIVE ATTRIBUTES OF ALTERNATIVE 1.5

Africa Planning Area

The highlight of Alternative 1.5 is the Zoo's recognition -- in response to the public's outrage -- that the Africa Planning Area's oak woodland is too valuable to destroy. Instead, the habitat will not only be preserved, but will benefit from enhanced restoration and a "habitat maintenance program." It will become a "best practices" demonstration area, and has been advanced in the timeline to Phase 1, instead of Phase 3.

Compared to the proposed Project, the change of attitude and recognition of the importance of preserving native species by the Zoo is dramatic and welcomed. However, we hoped the same re-thinking would have applied and informed a similar approach to the California Planning Area. This is not the case, unfortunately. (See California Planning Area.)

Aerial Tram

Abandoning the aerial tram is also applauded. The zig-zagging aerial tram, as sketched on a colorful Zoo plan, may have been a purely speculative concept. We suspect little engineering or cost analysis had been invested. We also appreciate the newfound recognition that the aerial tram was an attraction to draw visitors, rather than actual transportation or circulation, as pointed out in the earlier EIR.

Parking Structure

Withdrawing the multi-story parking structure is another improvement which improves aesthetics, and encourages us that the Zoo is committed to the shared vision of Griffith Park as a less car-centric park in the future.

Native Plants

Adopting actions for more native flora throughout the Zoo is positive, not only for their water-saving and wildlife interaction properties, but also as an example of best practices that visitors will appreciate.

THE CALIFORNIA PLANNING AREA

Ecosystem Loss of 16.1 Acres

As stated previously, the California Planning Area is not treated with the same careful consideration as the Africa Planning Area. The intense grading, excavation, and construction will leave little of the area intact as a plant community which supports native wildlife. Development of this area would result in loss of habitat, species, wildlife connectivity, and native biodiversity. This major disruption would lead to an inevitable degradation of ecological health in this space.

Zoo Animal Usage Increased

FoGP previously argued that it makes little sense to sacrifice undeveloped native habitat, since only a small portion would be going toward animal care. The proposed Project specified new animal space of 164,700 sq ft [EIR 2-44] or 3.8 acres in the California Planning Area. We did not intend this as a call for more zoo animals to be showcased on the slopes of the California Planning Area. Per the proposed Project, the addition of 3.8 acres of animal care space equates to approximately 24% of its undeveloped habitat, or 40% of the California Planning Area, as 4.5 acres [EIR 2-43] are already developed for animal care. In comparison, Alternative 1.5 claims 74% of the California Planning Area would be dedicated to animal care!

The FREIR does acknowledge errors in prior calculations of increases in animal space - 273% is quoted as now being erroneous since it should have instead been the true percentage increase which is now accurately calculated as 173% (58.7 acres – 21.5 acres divided by 21.5 acres). [p 3, Appendix Q] However, even these numbers seem incorrect as later in the same appendix [Table 1, p 5] 20.8 acres is listed as the starting basis for comparison of animal welfare area with a maximum build out of 59.7 acres for the Proposed Project. These miscalculations are confusing and must be explained.

Incorporating the new section, Appendix Q, comparing animal space, gives us little confidence in Zoo facts and hard data since it completely contradicts what was previously presented. There is now an additional disclosure in a footnote that the “geographic CAD data could not account for terrain and, as a result, was developed based on a flat map assuming level ground.” [FREIR Appendix Q, p 4] The inconsistency and error-ridden approach by the Zoo’s consultants in the appendix, and in the broader FREIR, is certainly a cause for concern.

In summary, the California Planning Area has much higher animal care land coverage (74%) than what was represented for the proposed Project (40%) in the EIR! “The needs of large [zoo] species are accommodated with features such as pools, natural terrain, and specialized night quarters.” [FREIR, p 28, 2022 Draft Plan] This would not bode well for sustaining any remnants of Mediterranean habitat with hoofed animals or bears moving onto it.

The LA Zoo should accept that it is not the San Diego Safari Park with its 1800 acres. Griffith Park is a unique wildlife oasis and is an island of unique habitat that is constantly under pressure of development and disturbance. Unlike Escondido, Los Angeles is much more urbanized and park poor; so, the importance of preserving what we have cannot be understated. While showcasing conservation work is important, the Zoo should prioritize how to use land effectively and efficiently, rather than saying “we just need more.”

Trees and flora

Alternative 1.5 claims that it prioritizes “planting of native plant species and especially preserving existing specimens and habitats with protected status and significant ecological function/importance.” [4-114] This claim only refers to the Africa Planning Area and perhaps other developed areas, but not in the California Planning Area. The California Planning Area is the exception to this generalized claim; the FREIR is not transparent in this regard.

It is an insufficient and weak gesture to spotlight how Alternative 1.5 has lessened adverse biological impacts merely because proposed wine grape vines are replaced with native plants. Also, “reimagining” the proposed Angela Collier Garden Project as a native garden is no offset to the destruction of 16.1 acres of established habitat.

Under Alternative 1.5, most of the added native habitat will happen as mitigation rather than what is highlighted as restoration. Mitigated habitat, especially after such transformational and destructive excavation of soil, offers a low probability of success of establishment and a lowered habitat value. Strict preservation of native habitat or restoration of native habitat from nonnative habitat is a much higher conservation standard.

Whereas the EIR touts Alternative 1.5 as “less intensive” because it protects City-listed trees and shrubs in the Africa Planning Area, it subjects the California Planning Area to even heavier usage than under than the original proposed Project. The same number of trees and shrubs listed under the City’s Protected Tree Ordinance are still entirely subject to “potential removal.” [FREIR 4-120] This includes seven coast live oaks, and numerous toyon and Mexican elderberry.

Our previously submitted comments regarding special-species status of flora remain applicable under Alternative 1.5. Some of those were not listed as potentially occurring in the EIR, despite our comments to correct the list. Since Alternative 1.5 again has references to special-status species, these corrections are still mandatory.

Alternative 1.5 comes with a claim that it “would also minimize impacts to Nevin’s barberry in the California Planning Area,” yet does not explain any additional mitigation or treatment of this species under Alternative 1.5, versus the Project. [FREIR, 4-206]

It should be noted that Nevin’s barberry (*Berberis nevinii*) is widespread on the California Planning Area, according to what is plotted on the map in the EIR, yet there was no full survey or specific count. Nevin’s barberry on LA Zoo land represents one of the most significant populations within Griffith Park. It is Federal and State-listed as endangered, and has a CPNS rank of 1B.2. “Exclusion fencing and signage” [EIR, ES-23] is offered as one of the mitigation measures available for individual plants, which is absurd. These mitigation measures do little for ecosystems, and merely offer temporary protection for individual plants. As fenced individuals, these plants stand little chance of offering reproductive continuity to its own species, and eventually disappear.

Wildlife

The major development in the California Planning Area “impacts wildlife movement,” is candidly noted for Alternative 1.5 [FREIR 4-114].

Indirect impacts on special-status wildlife species could also occur due to increased noise and light is acknowledged under Alternative 1.5 [FREIR 4-112].

All our previously submitted comments of special-status fauna remain applicable to Alternative 1.5. It should also be noted that several special-status species are still not listed in the EIR as potentially occurring, particularly reptiles. No corrections were made based upon our comments. In fact, we believe it is highly likely that multiple special-status species persist within the California Planning Area, such as the San Diegan tiger whiptail

(*Aspidoscelis tigris stejnegeri*). Since Alternative 1.5 again has many references to special-status species, the requested corrections are still applicable.

Nearly 300 species of bird species have been documented during the last few years in Griffith Park, which easily ranks it as one of the most avian biodiverse urban parks in the world. Scrub and shrubland habitat attract migratory species, and are also breeding grounds for birds nearly endemic to California, such as Nuttall's woodpecker, California thrasher, California quail, and the wren-tit.

Condor Canyon

The FREIR lists 14 "Areas of Known Public Controversy" [1-3], but does not specifically call out Condor Canyon as a point of contention. In truth, along with tree/habitat loss, the public has strongly and repeatedly opposed development of Condor Canyon. The artist's rendering of the unnatural canyon was posted widely in the media to exemplify the extravagance of the original LA Zoo Vision Plan. Why was it not even mentioned?

Alternative 1 is described differently in the Summary sections of the new FREIR when compared to the EIR. Is this to deliberately remove emphasis from the Condor Canyon excavation, since so much of the public supported Alternative 1? Alternative 1 is still on the table and unchanged, yet "avoid visual and geologic changes" was removed from the FREIR version:

-EIR: "...this alternative would preserve a combination of native and non-native vegetation communities supporting a limited range of sensitive species and protected trees, **as well as avoid visual and geologic changes to these areas.**" [EIR, 1-11]

-FREIR: "...this alternative would preserve a combination of native and non-native vegetation communities supporting a limited range of sensitive species and protected trees." [FREIR, 1-10]

Equestrians voiced concerns about blasting which will spook their horses; the FREIR acknowledges potential blasting. [4-151] Yet, on the Zoo website, the FAQ page says explicitly that it "does not plan to blast land in the Zoo," explaining that it is an outdated technique. This is just another example of the public relations messaging not matching the FREIR and it is important that there is clarification on this point. Can the Zoo definitively claim that blasting will not be used despite its explicit and numerous references in the FREIR?

The Zoo Department assumed responsibility of the Zoo from the Department of Recreation and Parks in 1997, knowing the topography of the land, because it wanted to remain in Griffith Park. The California Planning Area represents the most northeasterly terminus of the Santa Monica Mountain Range which extends more than 40 miles to the west. A reconfiguration of this valuable ridgeline formation would leave one of the first significant scars on the Santa Monica Mountain Range of the 21st Century. Many lament the mistakes

of the past, such as flattening the top of Mt. Lee or using Toyon Canyon as a landfill. We must not repeat these mistakes.

Although our most pressing concerns are Biological, the FREIR acknowledges the Aesthetics and Visual Resources may produce *significant* adverse and *unavoidable* impacts, under Alternative 1.5. Yet, they are indeed avoidable. Not excavating Condor Canyon and not developing the California Planning Area would surely reduce these impacts to less than significant levels.

While the habitat destruction is very concerning, the enormity of the excavation is quite alarming, with 74,000 cubic yards of exported earth/rock. It is staggering to conceptualize 12,000 trips of massive 20-ton dump trucks clogging the roads of Griffith Park where Recreation and Parks is currently working to curtail excess traffic. Approximately 6,000 filled dump trucks will be exiting the Zoo and then returning to fill up again. [20-ton dump truck capacity is 10-14 cu yds.]

Carbon

Alternative 1.5 is conveniently compared to the proposed Project, not other alternatives, such as Alternative 1. With regard to carbon footprint claims [FREIR p.24, 2022 Draft Plan], renewable resources for energy production does not absolve the loss of carbon-sequestration by highly adapted ecosystems. Carbon loss is not only a result of trees being eliminated, the removal and degradation of the California Planning Area's shrubland, chaparral and scrub habitat would also result in high amounts of carbon release. Above-ground biomass of these shrub communities can be significant, and the amount of carbon stored increases with the age of the stand.

In addition, in these ecotypes, a substantial amount of carbon may be stored below ground in their roots and in the microbial communities and symbiotic fungi that are associated with the roots (Bohlman et al. 2018; Kravchenko et al. 2019; Soudzilovskaia et al. 2019). The removal and degradation of these systems have been found to result in the loss above and below ground carbon storage (e.g., Austreng 2012). These ecosystems are adapted to hot and dry weather and are resilient to drought (Luo et al. 2007; Vicente-Serrano et al. 2013), which makes them perfect to sequester carbon as the climate crisis becomes increasingly urgent.

The Zoo, and the City, should prioritize the preservation of existing ecosystems instead of releasing more greenhouse gases and destroying habitats which possess carbon storage capacity, such as in the California Planning Area. Collapsing native ecosystems is not a wise policy, especially on public lands.

It is also misleading to the public for the FREIR to highlight, "Replace Parking Garage with Solar Panels" under Alternative 1.5. The same 163,000 square feet of solar panel coverage is part of the proposed Project, Alternative 1 and Alternative 2. There is no disclosed change in solar generation capacity at this location. It should also be noted that this is a "separate DWP project." [FREIR p 51, 2022 Draft Plan]

California Planning Area Development and Compliance with City Policies

Intrusion into native habitat contradicts the City's commitment clearly-articulated by the Green New Deal, A Vision for Griffith Park, and the City General Plan Open Space and Conservation Framework Element. Other citations have previously been entered into the record.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The CEQA Lead Agency misleadingly claims Alternative 1.5 as the "Environmentally Superior Alternative," even when compared with Alternative 1, yet the claim has no basis, especially in context with Biological Resources.

It is obvious. Whereas, two habitat areas are being set aside for conservation with Alternative 1, only 6 of 21 acres are set aside under Alternative 1.5. How could Alternative 1.5 possibly result in more protection or fewer impacts under Alternative 1.5 when compared to Alternative 1? While emphasis is now placed on native plant restoration, the destructive use of the California Planning Area habitat would obviously not be offset by restorations.

Table 4-4 [FREIR 4-27], the Comparison of Alternatives, inaccurately ranks biological, urban forestry, geology, and aesthetic impacts as equal, Alternative 1 vs. Alternative 1.5, without the required justifications.

The Lead Agency has an obligation under CEQA to find out and disclose all that it reasonably can. In failing to conduct a new review based on these new options, it is failing in its duty of candor. The entire purpose of an Environmental Impact Report is to disclose to the public and the City's decision-makers what the environmental impacts of a proposed project will be, the available alternatives, and whether alternatives and mitigation measures can eliminate the environmental impacts.

We recognize that it's fair game for the Zoo to spin the revised plan with a highly-hyped video, and well-chosen buzz words, it's not acceptable to disguise facts and information within the CEQA document itself.

SPECIAL EVENTS, NIGHT PARTIES

With Alternative 1.5, more event space is highlighted with the "Zoo Entry Garden and Park." This 60,000 sq ft. venue is larger than a football field, and located just inside the Zoo's main entrance. This event space was insufficiently mentioned in prior plans, and would be implemented in Phase 1.

This space will be set aside for public gathering for those paying entry to the Zoo, but is also "flexible for use as private space to accommodate special events." [FREIR 4-97, 4-98]

The main gate would be “designed to either be open to Zoo guests or closed to create a special event area with a separate entrance.” [FREIR, Appendix O]

While it is intended to replace the “visitor-serving uses” [FREIR, Appendix O] of the Africa Safari Picnic Area now off-limits for development, it is not clear that this area had the same utility as a private events space of comparable magnitude.

This addition concerns us deeply; are we witnessing right before our eyes the Zoo transforming into a Special Events Facility? The Zoo makes no secret that they are comfortable promoting and hosting their own events. In fact, there has been a concerted effort to ramp up this revenue source prior to the pandemic, and we can only assume this trend will continue with the massive expansion of available event space. The EIR highlights the success of the Zoo Lights event and points out that the “Expansion of facilities and spaces that can accommodate new events, more frequent events, or larger events would contribute to increases in annual attendance [FREIR 4-43]

Alternative 1.5, even before the newly highlighted Zoo Entry event space, boasts new construction of visitor center space totaling 73,800 sq ft, which includes two new structures, the California and Africa Visitor Centers. These new venues also would be available for private events, along with the improved Treetops Visitor Center.

With respect to lights and sonic disturbances, evening events outside of regular Zoo operating hours is especially problematic from biological, aesthetics and nuisance perspectives. The California Visitor Center will be highly visible from trails of Griffith Park, as well as from Glendale and beyond, because of its high elevation, roughly 150 ft. above the basin terrain.

Potential adverse impacts on special-status wildlife species due to increased noise and light are acknowledged. [FREIR 4-112] Because of the California Visitor Center’s setting high on a ridgeline, approachable by nighttime event guests via the proposed funicular, light and sonic impacts would be most oppressive when compared to other nighttime usage areas. For this reason alone, the California Visitor Center should be the first of the four special event areas to be stricken from Alternative 1.5.

TRAFFIC AND ATTENDANCE

A comparative analysis of visitor attendance is difficult to forecast. Complicating matters is an inconsistency in the projected annual attendance for Alternative 1. The EIR shows a higher figure (2.6m) than the FREIR (2.5m), even though the same study is cited [EIR Table 4.7 & FREIR Table 4.7]. Why are these different numbers?

Assuming the correct number is 2.6m, Alternative 1.5 has a lower projected number (2.5m) than Alternative 1. How can this be? Alternative 1.5 indisputably provides a larger visitor area than Alternative 1, which restricts 21 acres from use. Simply put, the Zoo would hold considerably more people under Alternative 1.5.

Adding further fuel to this logic, Alternative 1.5 also includes dynamic pricing and reservation tool, the Peak Visitor Management Program (PVMP), designed to optimize use of parking spaces. The Peak Visitor Management Program protocol may prevent overcrowding and traffic jams during popular periods, but it is without doubt, a tool to enhance overall attendance. Extending visitor hours [FREIR, 4-100] is also a possibility under Alternative 1.5, to manage “demand and capacity,” which could further increase visitor capacity, not to mention evening events having a heightened focus, with another event space of 60,000 sq ft.

The Zoo boasts they did a great job during the pandemic, spreading out visitor demand during the day as constrained by their COVID cap of 10k visitors at any one time. We are concerned that if demand is truly that elastic and visitors are more efficient using the PVMP tool, a LOT higher attendance numbers than even under the proposed project is possible. Ultimately, all visitor numbers presented are based on initial data and then, with Alternative 1.5, are decremented by the PVMP throttling ONLY downward, not accounting for potentially shifting demand laterally into hours of less demand.

Since attendance equates to Griffith Park traffic, and since Alternative 1.5 accelerates implementation of visitor-producing aspects of the plan, we would expect more traffic, and it would come sooner, in Phase 1.

CORRECTIONS, CONTRADICTIONS, INCONSISTENCIES

1. Under the proposed Project, the aerial tram’s purpose is “to improve access.” Under the FREIR, the removed aerial tram is explained as “one less attraction at the Zoo under this alternative.” Is an aerial tram a means of access or an attraction? [EIR Table 4.2, 4-17 & FREIR 4-100]

2. The FREIR claims the California Planning Area’s existing animal care space occupies 1.7 acres, whereas the figure provided in the EIR is 4.5 acres. Which is correct? [EIR 4-43 & FREIR 2-43]

Further, the total animal space for the proposed Project is now reported as 15.6 acres. [FREIR Table 1, p 15, Appendix Q], whereas data in the EIR indicates animal space for the proposed Project as 8.3 acres (4.5 + 3.8). How is this possible?

3. As noted previously there is an inconsistency in Projected Growth of annual attendance under Alternative 1. The EIR shows higher numbers (to 2,646,984) than the FREIR (to 2,525,775), even though the same study is cited [EIR Table 4.7 & FREIR Table 4.7]. Which is correct?

4. As noted in the Condor Canyon paragraph above, why is Alternative 1 described differently in the FREIR?

5. This makes no sense: “These guidelines would also prioritize planting of native and drought-tolerant species compatible with Zoo animal habitat needs where non-native species may be required or desirable.” [FREIR 4-114] Was the intention to say, “...except where non-native species may be required or desirable?”

IN CONCLUSION

As an advocacy organization that cares passionately about the protection of Griffith Park as well as conservation of the many important species within its bounds, we are encouraged to see a number of changes that have been highlighted in this new Alternative 1.5. We commend the Zoo for truly listening to community and stakeholder feedback in order to revise their plans to arrive at this new alternative. However, we strongly feel that there is one more step that needs to be taken, and that is the protection, conservation, and a firm commitment to NOT develop the California Planning Area as outlined in this plan.

As we have articulated above, the Zoo can meet their objectives of animal care excellence and fulfill their important mission of educating as many people as possible about conservation without destroying this hillside. An updated version of Alternate 1.5 that models its California Area development along the lines of what was proposed in Alternative 1 is a concept we would fully and enthusiastically support. Again, we fully support the Zoo's mission of conservation, outreach and education, and look forward to supporting their plans for modernization and evolution in the future; however, this cannot come at the expense of razing undeveloped lands and disrupting the wildlife (native species) that currently call it home.

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.