



advocacy and action  
for Los Feliz

**2022-2023**

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August 15, 2022

**RE: Focused Recirculated Zoo Vision Plan, CF 21-0828**

Dear Mr. Mundy:

Los Feliz Improvement Association (LFIA), representing thousands of residents in Los Feliz and around Griffith Park, has studied the FREIR for the Los Angeles Zoo Vision Plan which was released on July 14, 2022. While Alternative 1.5 is an improvement on the initial Vision for the Zoo, it still falls short of the mark. The mission of a zoo is to provide a safe and comfortable environment for the viewing of its captive animals. This plan is a veiled attempt to transform the LA Zoo into an entertainment venue. LFIA cannot support such a change in the Zoo's mission.

LFIA appreciates that numerous egregious elements of the Zoo Vision have been removed in Alternative 1.5. Preserving the beautiful oak woodland in the Africa Area is greatly appreciated and also keeps the Zoo from violating the City's Protected Tree Ordinance. But shame on you for having even remotely considered such a destructive plan in the first place.

Eliminating the aerial tram will save the Zoo millions of dollars in construction costs.

Eliminating the proposed multi-story parking structure gives us hope that the Zoo may be joining other park planners in using contemporary best-management practices of reducing the number of automobiles in parks. The creation of a Peak Visitation Management Program is a hopeful sign. It worked successfully controlling reduced visitorship during the pandemic.

Eliminating the vineyard proposed for the steep slope of the California Area is a step in the right direction. Every city department is urging Angelenos to plant native plants because they are adapted to California's climate and require less water.

However, we still have serious concerns about several features of Alternate 1.5.

LFIA was very disappointed to see that Condor Canyon was still included in Alternate 1.5. Changing its name to Condor Corridor did not in any way reduce its impact on the environment. Digging a 60-foot-deep trench, whether by blasting or by excavation, to go through a hill is impactful and entirely unnecessary. Your own illustrations state that ADA guests can either take the corridor or the tram. Since they already have access, there is no need to build another.



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It is unfathomable that Alternative 1.5 which includes Condor Corridor could be considered the Environmentally Superior Alternative. Where are the scientific studies to support such a claim? Alternative 1 has no Condor Canyon/Corridor. It is obvious to all that excavating 74,000 cubic yards of dirt and rock and hauling it out in 6,000 trips of dump trucks (12,000 trips if you count when they come back for another load) will have a huge impact. The particulate matter released into the air will be enormous. What impact will that have on Zoo animals, staff and visitors? The FREIR's declaration of Alternative 1.5 as the Environmentally Superior Alternative when it is patently obvious it is not makes us suspicious of the accuracy of all of your analyses.

The proposed California Area is to be constructed on the top of a ridgeline. It is one of the most visible ridgelines in Griffith Park as it is visible from both I-5 and SR 134 as well as from Atwater Village and Glendale. All of the Santa Monica Mountains, including that ridge, are included in the recently passed federal Rim of the Valley initiative. The City of Los Angeles, recognizing the importance of preserving ridgelines, is in the process of approving a new Wildlife Ordinance which includes protecting ridgelines. The development of the California Area would be in violation of that ordinance.

While the California Area does not include large numbers of protected oak trees, it does contain valuable chaparral. This is the same chaparral that makes up the vast majority of Griffith Park habitat. Its value as habitat should not be underestimated. Indeed it is this chaparral that supports most of Griffith Park's birds and animals.

The zoo is proposing 750,000 new visitors/year. What are the real measures to mitigate the impacts of those automobile trips on the park and adjacent neighborhoods? When one looks under the hood, the Peak Visitation Management Program doesn't offer any certainty that the park and the adjacent neighborhoods won't be flooded with additional cars. And, there is a reliance on the Parkline Shuttle, but that shuttle is currently not functioning (and hasn't been for several years), does not have funding, and is not scheduled to recommence due to a driver staffing shortage. Our experience is that if traffic mitigation isn't guaranteed up front in the plan, it is quite unlikely to be added voluntarily in the future.

Great care must be taken in the re-routing of Crystal Springs Drive around the Zoo south parking lot to assure that it does not impact the Zoo Magnet School. It must also preserve the tree-lined trail that makes a loop around the golf course. This is an especially valuable hiking trail as it is one of the few trails in Griffith Park that is fairly level and suitable for baby strollers and for people with mobility issues. The tree-lined route provides welcome shade on hot days and must be preserved.

The Zoo was highly criticized for its lack of community outreach in 2019. Only a few organizations were contacted by the Zoo; many interested organizations only found out about the Zoo's Vision Plan from friends in other organizations. The same can be said for the release of the FREIR on July 14, 2022. Although LFIA submitted a comment letter in 2021, we were not notified of the release of the new FREIR for Alternative 1.5. Several other groups were similarly not notified. This is a serious failure on the part of the Zoo.



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Since the Scoping Period for the Zoo's Vision Plan in January, 2019, LFIA has been trying to find out what is proposed to happen to the Griffith Observatory Satellite located in the middle of the Zoo's south parking lot. It did not appear on drawings of the proposed Vision Plan. It was never mentioned in the text. To date, it has not appeared anywhere. The Zoo does not seem to recognize its existence. What will happen to the Griffith Observatory Satellite facility?

LFIA's greatest concern is that the Zoo seems to be changing its focus from animal care and conservation to an entertainment venue and event rental space. The Zoo is located entirely in Griffith Park which is zoned Open Space. The emphasis and reallocation of space in the proposed Zoo Vision Plan towards entertainment is not allowed on land zoned for Open Space. Therefore, LFIA was dismayed to learn that instead of *reducing* the number of entertainment venues as requested in numerous public comments, Alternative 1.5 proposes adding a new venue called innocently Entry Garden and Park. This new venue, located near the now eliminated parking structure, is the size of a football field. Gates to the facility would be designed so that event guests could have access to the Zoo itself, or not, depending on the plans for the event. This addition of event space is moving in the wrong direction.

The recommendation to expand visitor-serving facilities, particularly event rental space, allowing the LA Zoo to become a 200+ night per year entertainment venue should not be pursued. The wilderness designation of Griffith Park makes it an inappropriate setting for such activity with the resulting noise and light pollution, particularly for the nocturnal wildlife that lives adjacent to the zoo. The noise and light pollution generated by the event areas would also be harmful to the Zoo's own animals, species that the Zoo is charged with protecting.

Tangentially, we have reservations about digital signage anywhere in Griffith Park, for the same reasons.

Alternative 1.5 has many commendable features. LFIA could support Alternative 1.5 if it eliminated the construction of Condor Corridor and California Visitor Center. In general, other alternatives are inappropriate for America's largest urban wilderness, and LFIA will vigorously oppose any attempt to transform the Zoo into an entertainment venue within Griffith Park.

Sincerely,  
The Board of Directors of LFIA

A handwritten signature in black ink, appearing to read "Amy Gustincic".

Amy Gustincic  
President, LFIA