

Communication from Public

Name:

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Council File No: 21-0828

Comments for Public Posting: Attached, please find my comments regarding the proposed L.A. Zoo Vision Plan and expansion and support of Alternative 1.

Eric Garcetti
City of Los Angeles
200 N. Spring Street Los Angeles, CA 90012

Councilmembers John Lee, Mike Bonin, and Mark Ridley-Thomas
Arts, Parks, Health, Education, and Neighborhoods Committee
Los Angeles City Council
200 N. Spring Street
Los Angeles, CA 90012

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

Honorable Chair John Lee:

Having worked at the L.A. Zoo for 18 years and seen firsthand how projects change from concept to completion, I suspect that many of the components of the proposed Zoo expansion are “pie in the sky” plans based on a wild sense of optimism with only vague expectations that they will actually be realized. But, because I have also seen firsthand how projects fail at the L.A. Zoo, I feel I must speak up about certain aspects of the unrealistically conceived expansion. Friends of Griffith Park have addressed in much more specific detail the problems in terms of environmental impact with the Zoo Vision Plan. I hope that my perspective as a former longtime staffer will bolster the points made by FOGP and native plant advocacy groups as well as call attention to the potential waste of funding that certain components of the plan will prove to be.

Contradicts Zoo Conservation Mission

Griffith Park is a treasure, an oasis of natural chaparral habitat for both humans and wildlife. It needs to be conserved at a time when such spaces are more valuable than ever as refuges from rampant urbanization.

The proposed 23-acre expansion will destroy a significant swath of this native habitat—contrary to the mission of the Zoo, which is to protect and preserve wilderness and wildlife for future generations. A portion of the areas that are considered “under-utilized” serve as a buffer zone between all the developed areas of the campus and the surrounding park. These areas are important in providing a transition between Zoo grounds, with its

bustling human activity, noises, lighting, non-native plants and animals, and the native habitat beyond.

Although the Zoo will make the argument that increased attendance and revenue will support its conservation mission by raising money to support the Zoo and its programming, I suspect the revenue is more to help bolster the City budget and I do not see how a climbing wall and a deluxe restaurant with a vineyard as set dressing will encourage people to think about habitat loss and conservation. Monocultural agriculture such as vineyards are actually a major threat to wildlife and biodiversity. A major threat to almost every endangered species that I wrote about during my Zoo career is human development (including vineyards) and encroachment on wilderness areas. As for the rock climbing wall, I doubt very much that it will offer an experience that is anything like what condor caretakers undertake when performing nest checks and other routine management activities.

This type of development and expansion is the exact type of activity that the Zoo “and Botanical Gardens” in its conservation messaging, urges against in other parts of the world, and stands as a dangerous “do as we say, not as we do” example. Such contradictory messaging undermines the hard work that the Zoo has invested in its role as a conservation advocate. Additionally, this expansion will sacrifice natural habitat for components that have nothing to do with the wildlife conservation programs and mission objectives of the Zoo.

Impact on Native Plant Communities

California is a biodiversity hotspot, with exceptionally high plant endemism, meaning species that are found nowhere else in the world. There are more endemic plants and more endangered plant species in California than any other state in the U.S. except Hawaii. (See attached infographic based on USFWS data.) According to the Critical Ecosystem Partnership Fund, “the California Floristic Province is distinguished more by the endemism of its plants than its animals. Of nearly 3,500 species of vascular plants in the hotspot, more than 61 percent are found nowhere else in the world. About 52 plant genera are also endemic.” Griffith Park is home to numerous species of interest and concern, both plants and

animals. The Zoo should instead invest in educating the public about our distinctive native habitat.

<https://www.cepf.net/our-work/biodiversity-hotspots/california-floristic-province/species>

Destruction of Native Trees

The proposed expansion will destroy more than 200 trees representing protected species designated as such by the City of L.A. including native oak and black walnut as well as countless other California native plants that occur naturally in the park, some of which are rare and endangered.

Although mitigation is included alongside the proposed destruction, in my experience as a native plant advocate, as a docent with the Theodore Payne Foundation for Native Plants and Wildflowers, and during my board service with the Southern California Horticultural Society, I can assure you that replacing more than 200 mature native trees with nursery-grown individuals will be next to impossible due to availability alone. Even if an appropriate number of difficult to cultivate species such as California black walnut could be located, it takes decades for trees to mature, so whatever mitigation is made, it will take generations to “replace” these trees.

For an estimate of the cost to replace mature trees that are lost, consult an arborist or tree curator at an actual botanical garden such as the L.A. County Arboretum or The Huntington Botanical Gardens.

https://clkrep.lacity.org/onlinedocs/2013/13-1339_ORD_186873_02-04-2021.pdf

Loss of Protected Succulents

I know from firsthand experience that populations of *Dudleya* occur on the hillsides inside the gated staff parking lot, which is part of the destruction zone. Species in this genus now have state protections thanks to AB223, signed by Governor Gavin Newsom earlier this year. These succulents are difficult to relocate once ripped from their natural environment, so it is unlikely that any mitigation plan will actually save them, and would sacrifice the beauty and uniqueness of this naturally occurring population.

https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB223

Lack of Resources to Maintain Proposed Additions

Despite the “botanical garden” appellation, the Zoo has not been accredited for its living collections (both plants and animals) by the American Alliance of Museums since 2016 when it withdrew from the accreditation program. Any horticulture efforts (labeling, accessioning, conservation programs, collections planning) ceased years ago. There is no horticulture curator or manager on staff, and if there were, the vineyard and destruction of native flora would certainly have been contested during the earliest discussions of this plan. Additionally, the Zoo lacks a sufficiently trained staff to maintain a horticultural project as ambitious as a vineyard. Case in Point: the failed green roof project.

In 2007, the Zoo trumpeted the green roof on the Living Amphibians, Invertebrates, and Reptiles (LAIR) exhibit. This horticultural endeavor was insufficiently researched, poorly designed, inadequately planned, value engineered to its detriment, and ultimately doomed. Lack of a horticulture expert on staff was a major contributing factor to this disappointment. The proposed vineyard will become another example of this horticultural failure and prove to be a waste of funding.

Ironically, I am familiar with the challenges of sustainable vineyards thanks to the extensive amount of copy I wrote about the Zoo’s Sustainable Wine Dinners series. Maintaining a 25,000-square-foot vineyard, as opposed to some decorative grape vines on a few trellises, is a massive undertaking that requires a staff of specially trained caretakers. L.A. City gardeners lack the knowledge base and skills to maintain a vineyard. Sustainable or biodynamic vineyards are even more labor intensive. Conventional vineyards are notorious for their reliance on chemical controls (fungicides, pesticides, fertilizers, soil amendments, etc.) and would seem to run up against Association of Zoos and Aquariums guidelines that restrict the use of chemical controls in the interests of animal welfare. As it is, the staff are challenged enough caring for the existing grounds according to best Integrated Pest Management practices.

Traffic Congestion

The proposed increase in attendance would mean 72 percent more traffic, which is already disruptive during big Zoo events such as Boo at the Zoo, Big Bunny's Spring Fling, and Zoo Lights. Even if a new, multi-level garage is constructed to accommodate the masses of cars, Zoo Drive, Crystal Springs Drive, Western Heritage Way, and the nearby freeway on and off ramps will become horrific knots of congestion. In years past, Zoo staff have basically been besieged by event traffic and unable to exit campus in order to go home.

Detrimental Human Behavior

Increasing the number of visitors who go to the Zoo for theme park activities will also increase noise, trash, and disruptive behavior, which will compromise the welfare of animals who reside in the Zoo as well as wildlife that inhabit Griffith Park. As it is, staff must always be vigilant and watch for visitors who might throw items into exhibits, graffiti the structures and plants, or engage in intrusive behavior. And this is a problem without a deluge of guests who may not be interested at all in the animals, only in theme park activities. Even passive human activity can impact zoo animals and the wildlife nearby. Studies show that light pollution in particular has a disruptive effect on pollinator behavior and insect populations, which in turn impact bird populations.

Sources: <https://www.sciencedaily.com/releases/2021/03/210317111751.htm>

[https://esajournals.onlinelibrary.wiley.com/doi/full/10.1890/1540-9295\(2004\)002\[0191:ELP\]2.0.CO;2](https://esajournals.onlinelibrary.wiley.com/doi/full/10.1890/1540-9295(2004)002[0191:ELP]2.0.CO;2)

Certainly, the environmental impact study conducted has identified these problems. But then, I also know that the efficacy of environmental impact research depends on how thorough the study is, who is conducting it, and whether or not it falls on deaf ears.

Conclusion

The L.A. Zoo can be upgraded sufficiently without consuming and compromising adjacent park areas. I understand that the areas in question are essentially unused sections of the Zoo, but they constitute an important buffer zone between the developed portion of the property and the

wilderness beyond. Sacrificing this buffer will compromise Griffith Park and the Zoo. Focus instead on Alternative 1. Funding would be better spent replacing antiquated roundhouse spaces and the unused cave exhibits in the Winnick Family Children's Zoo with modern habitats and improving infrastructure so that chronic sewage backups in animal care staff areas and other health and safety concerns can be addressed. The exhibits can be expanded and improved without destroying 23-acres of Griffith Park habitat. Invest in better exhibits, improved Zoo infrastructure, and multi-lingual interpretive signage in so that any future Olympics visitors can learn about the Zoo's conservation success.

Thank You,
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