

Communication from Public

Name: Miriam Hartman

Date Submitted: 10/24/2021 08:17 PM

Council File No: 21-0828

Comments for Public Posting: I would like to urge the council to reject the LA Zoo's proposed full expansion project. As a Zoo member and mother of a 2-year-old zoo (and nature) enthusiast, I will be heartbroken if the Zoo chooses to destroy native California habitat in order to build amusement-park-style features. This is not at the heart of the core mission of the zoo and is not with the spirit of good environmental stewardship. Instead, I urge you to support Alternative 1, which allows for improved zoo animal habitat without the destruction of the important *wild* animal habitat that currently surrounds the Zoo property. Build a better zoo, not a bigger zoo. And better doesn't mean an amusement park. I hope that the Zoo will continue to improve its educational features and strive to make its animal enclosures comfortable and interesting for the current inhabitants. Thank you for reading this and for your time. Miriam Hartman, mom of Jack who loves the elephants 4545 Glenalbyn Drive Los Angeles

Communication from Public

Name: Travis Longcore
Date Submitted: 10/24/2021 09:10 PM
Council File No: 21-0828
Comments for Public Posting: Please see attached letter from Los Angeles Audubon Society.

Los Angeles Audubon Society
P.O. Box 931057
Los Angeles, California 90093-1057



Councilmember John Lee, Chair
Arts, Parks, Health, Education, and Neighborhoods Committee
City Council
City of Los Angeles

Re: CF 21-0828 — Los Angeles Zoo Vision Plan Project Final Environmental Impact Report (SCH# 2019011053)

Dear Chair Lee and Committee Members:

Los Angeles Audubon Society has been a voice for birds and conservation in Los Angeles for over 100 years. Our mission is to promote the study and protection of birds, other wildlife, and their habitats throughout the diverse landscapes of the Los Angeles area. We have over 3,500 members and supporters, most of whom live in the City of Los Angeles.

It is with some sadness that we offer these comments on the future of the Los Angeles Zoo, given the undeniable and essential role that the Zoo played in rescuing the California Condor from extinction. But all developments must be assessed on their impacts, whether they are proposed by conservation partners or not, and the Final Environmental Impact Report (FEIR) for the Vision Plan presents a troubling insight into Zoo priorities — focused on recreation and tourism — and evincing a genuine disregard for the local environment.

In their comments on the Draft EIR, the California Department of Fish and Wildlife (CDFW) requested that the EIR use the vegetation classifications in the Manual of California Vegetation. This was for a reason. Once vegetation is properly mapped, a Lead Agency can see if any of the vegetation communities are recognized as Sensitive Natural Communities by CDFW. CDFW provides a list of these Sensitive Natural Communities (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=153609&inline>). To avoid significant adverse impacts on biological resources, they must be mitigated by area at prescribed ratios.

Vegetation mapping under the Manual of California Vegetation uses “Alliances” and “Associations” as the categories for classification. In the FIER, the listing of Alliances is inadequate and probably inaccurate, because California Walnut (*Juglans californica*) is present in an area of Coast Live Oak Woodland. If the mature cover of the California Walnut makes up 30% of the total tree cover in any part of that area, and the vegetation map suggests that would be possible, then the proper Alliance for that portion of the hillside would be California Walnut Groves (<https://vegetation.cnps.org/alliance/33>), even though

the oaks have more cover. The Alliance is defined by a species that is not dominant because of the particular membership rules for California Walnut Groves (Sawyer et al. 2009). The biological report in the Appendix provides no evidence of quantitative surveys to determine vegetation cover by species, or any of the other elements of doing proper protocol-level surveys as recommended by CDFW. The conservative assumption for impact analysis must therefore be that the site includes California Walnut-Coast Live Oak Woodland, which is an Association within the California Walnut Groves Alliance. This Association is also a Sensitive Natural Community and must be mitigated at a 5:1 ratio by area. The FEIR does not properly identify this community, nor provide explicitly for its mitigation.

The FEIR also mis-identifies other vegetation classifications (Table 3.3-2, p. 293 of the pdf). The FEIR claims the presence of “Coastal Sage and Island Scrub Oak Chaparral,” which is a vegetation association only found on the Channel Islands (see <https://vegetation.cnps.org/alliance/258>). But the two dominant species for this Alliance are not reported as even being present in the biological report in the Appendices, so this is an error made in haste to complete the revisions. It is much more likely that the authors meant California Sagebrush Scrub (<https://vegetation.cnps.org/alliance/566>) and this Alliance is not present. If Coastal Sage and Island Scrub Oak Chaparral Alliance were actually present, it would need to have been identified as a Sensitive Natural Community with a S3 state rarity ranking and any impacts to it mitigated at 5:1 ratio by area to avoid significant adverse impacts.

Beyond the sloppy work on the biological impacts analysis, it is quite astounding that the Zoo is proposing to develop an area with documented rare and endangered species for the “California” zone. Why destroy existing habitat for a California exhibition when it is already a California landscape? What conservation purpose does it serve to construct a half-acre vineyard on habitat that once supported an endemic and endangered native plant (Nevin’s barberry)? Why would the Zoo clear native habitat for a camping area, when it is a zoo, where the focus is on animals and their conservation? Surely there are already sufficient areas to pitch a tent on the grounds without taking more habitat and killing the native woodrats (*Neotoma* sp.) that are acknowledged to be present in the FEIR.

The FEIR relies on various measures that are not effective for mitigation, such as relocating wildlife. As summarized by Villaseñor et al. (2013), “Wildlife rescues seem to be performed for conservation purposes but are really aimed at solving conflicts between development projects and wildlife.” Simply “moving” the wildlife out of the path of immediate harm is not a mitigation measure because any suitable destination site would very likely already be occupied. Translocation can also move diseases and disrupt genetic structure (Villaseñor et al. 2013). No mitigation credit should be afforded to the relocation proposed in the FEIR.

The FEIR is also woefully deficient in considering the impacts of lighting from the project, both on the Zoo animals and on wildlife in and surrounding the Zoo property. The FEIR does not even mention the most basic best management practices, such as reducing the blue output from nighttime lighting to reduce impacts on the circadian rhythms of captive wildlife (Robert et al. 2015, Dimovski and Robert 2018). Given that the FEIR is prepared by a zoo, it reveals an embarrassing ignorance of the basics of impacts of artificial light at

night on animals. Have none of the species experts who work at the Zoo read the FEIR? The preparers did not even bother to mention circadian rhythms at all, which is a tragic oversight, given the Zoo's mission and the animals in its care.

On this topic, the preparers of the FEIR appear unaware that different species of bats react differently to light and disturbance. They actually claim, "bats currently roost in bat boxes in one of the most frequented areas of the Zoo and therefore, are acclimated to light, noise, and human activity in this area," and use this as a rationale for why additional disturbance will not affect bats (p. 8-168). Not all bat species are the same, and just because one species is disturbance tolerant it does not mean that all species are. Bats with different foraging strategies have different tolerances for artificial light at night (Rydell 2006, Stone et al. 2009, Rowse et al. 2016, Laforge et al. 2019, Russo et al. 2019, Bhardwaj et al. 2020). The FEIR utterly fails to take this into account or show even the most basic awareness of the scientific literature on the topic.

The reduced project alternative would be preferable to the current plan, which is wasteful of existing native biodiversity and prioritizes visitor gimmicks (e.g., funicular, rock-climbing walls, wedding hosting, etc.) over the most important benefit of the Zoo, which is its contribution to conservation. The current plan and its emphasis on providing a recreational amenity rather than an educational and conservation center will tarnish its image as a serious player in species conservation.

Sincerely,



Travis Longcore, Ph.D.
President and Conservation Co-Chair

Literature Cited

- Bhardwaj, M., K. Soanes, J. J. Lahoz-Monfort, L. F. Lumsden, and R. van der Ree. 2020. Artificial lighting reduces the effectiveness of wildlife-crossing structures for insectivorous bats. *Journal of Environmental Management* **262**:110313.
- Dimovski, A. M., and K. A. Robert. 2018. Artificial light pollution: shifting spectral wavelengths to mitigate physiological and health consequences in a nocturnal marsupial mammal. *Journal of Experimental Zoology Part A: Ecological and Integrative Physiology* **329**:497–505.
- Laforge, A., J. Pauwels, B. Faure, Y. Bas, C. Kerbiriou, J. Fonderflick, and A. Besnard. 2019. Reducing light pollution improves connectivity for bats in urban landscapes. *Landscape Ecology* **34**:793–809.
- Robert, K. A., J. A. Lesku, J. Partecke, and B. Chambers. 2015. Artificial light at night desynchronizes strictly seasonal reproduction in a wild mammal. *Proceedings of the Royal Society B-Biological Sciences* **282**:20151745.

- Rowse, E. G., D. Lewanzik, E. L. Stone, S. Harris, and G. Jones. 2016. Dark matters: the effects of artificial lighting on bats. Pages 187–213 *in* C. C. Voigt and T. Kingston, editors. *Bats in the Anthropocene: Conservation of Bats in a Changing World*. Springer, Cham.
- Russo, D., L. Ancillotto, L. Cistrone, N. Libralato, A. Domer, S. Cohen, and C. Korine. 2019. Effects of artificial illumination on drinking bats: a field test in forest and desert habitats. *Animal Conservation* **22**:124–133.
- Rydell, J. 2006. Bats and their insect prey at streetlights. Pages 43–60 *in* C. Rich and T. Longcore, editors. *Ecological Consequences of Artificial Night Lighting*. Island Press, Washington, D.C.
- Sawyer, J. O., T. Keeler-Wolf, and J. Evens. 2009. *A Manual of California Vegetation*. Second edition. California Native Plant Society, Sacramento.
- Stone, E. L., G. Jones, and S. Harris. 2009. Street lighting disturbs commuting bats. *Current Biology* **19**:1123–1127.
- Villaseñor, N. R., M. A. H. Escobar, and C. F. Estades. 2013. There is no place like home: high homing rate and increased mortality after translocation of a small mammal. *European Journal of Wildlife Research* **59**:749–760.

Communication from Public

Name: Bella Liu

Date Submitted: 10/24/2021 01:25 PM

Council File No: 21-0828

Comments for Public Posting: LA's wildlife is one of our greatest assets. According to the World Health Organization, "Biodiversity supports human and societal needs, including food and nutrition security, energy, development of medicines and pharmaceuticals and freshwater, which together underpin good health. It also supports economic opportunities, and leisure activities that contribute to overall wellbeing."
Conservation isn't just a moral issue -- it's directly related to practical interests. Our ecosystems purify our water and air, and they support organisms that benefit us. Birds and insects pollinate our crops and gardens, and natural predators keep nuisance species in check. While destroying native habitat may seem economically beneficial in the short term, it is economically harmful in the long run. Please stop the expansion of the zoo and support Alternative 1 instead. Zoos should conserve species, raise animals that cannot be released back to the wild, and educate the public. It is irresponsible and counterproductive to destroy valuable ecosystems for amusement-park-like attractions.

Communication from Public

Name: Matthew Walker

Date Submitted: 10/24/2021 08:54 AM

Council File No: 21-0828

Comments for Public Posting: The Zoo's 20 Year Vision Plan is flat-out horrifying. Destroying 23 acres of native woodlands, including endangered plant species, that is also habitat for wild animals, as opposed to those caged in the Zoo, makes no sense--especially to build a gargantuan, kitschy complex of fake canyons and pseudo Yosemite-style buildings. That's not the Zoo. That's not Griffith Park. That's Disney's California Adventure, which belongs in Anaheim and should stay there. Who could possibly think this is a good idea? I will actively oppose approval of this monstrosity at every turn. There is an alternative, Alternative 1, which does deserve support. • It does not destroy 23 acres of native habitat, including 227 City-protected trees • The full project is counter to City priorities, including the Biodiversity Report and the LA Sustainability Plan • The LA Zoo will still benefit from zoo animal care improvements and many visitor amenities if Alternative 1 is implemented. Thank you, Matthew Walker 90065

Communication from Public

Name: Ms Walsh

Date Submitted: 10/24/2021 09:07 AM

Council File No: 21-0828

Comments for Public Posting: Destroying part of Griffith Park - and the plants and trees that grow there - in order to expand a tourist attraction is unconscionable. Los Angeles has many dozens of attractions for visitors. The park is enjoyed by millions of LA County residents and should not be destroyed in a bid to make more money from tourists. Griffith Park is the closest to nature those of us within the city limits can reach easily - it's the only way for those who walk or cycle or take public transport to find greenery. Destroying it to create a tourist attraction no one needs or wants is an insult to LA residents.

Communication from Public

Name: Diana Nitchman
Date Submitted: 10/24/2021 11:11 AM
Council File No: 21-0828
Comments for Public Posting: Our Zoo should not be subject to expansion merely to compete for tourists dollars. The mission should continue to be animal care and protection within the zoo footprint and not encourage more traffic and buildings within these boundaries. Please consider Option 1 only, in moving forward with change at the zoo.

Communication from Public

Name: Jennifer Wolfe

Date Submitted: 10/24/2021 11:13 AM

Council File No: 21-0828

Comments for Public Posting: I am writing to strongly oppose current plans to expand the Los Angeles Zoo by destroying 23 acres of natural habitat in Griffith Park. Los Angeles has an abundance of amusement and theme parks; we do not need another one in this already crowded, heavily touristed city park. The plan points out that these new developments will lead to a 67% increase in zoo attendance. Is this supposed to be a good thing? Griffith Park is already a parking lot on most weekends. The additional car exhaust, trash, and general human congestion will be yet another assault on the fragile natural habitats within the park. Griffith Park is not Disneyland. It is a city park, and a goal of any city park is to protect the natural ecosystems within our urban sprawl, NOT to destroy it for profit. Please support Option 1 and in doing so, support our beautiful park.