

## Communication from Public

**Name:**

**Date Submitted:** 11/26/2021 03:08 PM

**Council File No:** 21-0828

**Comments for Public Posting:** Commenting to oppose the Project as presented and request Alternative 1 as the environmentally superior alternative for the LA Zoo transformation. This is directed to the members of LA City Council's Arts, Parks, Health, Education, and Neighborhoods Committee. Thank you.

## Communication from Public

**Name:** Garrett Weinstein  
**Date Submitted:** 11/30/2021 11:46 AM  
**Council File No:** 21-0828  
**Comments for Public Posting:** Please accept the attached letter from the Santa Monica Mountains Conservancy. Thank you.

**SANTA MONICA MOUNTAINS CONSERVANCY**

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November 22, 2021

Los Angeles City Council  
Arts, Parks, Health, Education, and Neighborhoods Committee

**Comments on Los Angeles Zoo Expansion Project and Final EIR  
CF 21-0828**

Honorable City Councilmembers:

The Santa Monica Mountains Zone is an environmental resource of critical concern. The Los Angeles Zoo and the greater Griffith Park ecosystem are both located in this precisely mapped zone. The primary actions of the Zoo should be to maximize the quality of life for its animals and those wild animals living in the Griffith Park and Los Angeles River ecosystems. With global warming, persistent drought, continued development of single-family homes, growth of Accessory Dwelling Units (ADUs), and utility projects, the ecological capacity of the greater Griffith Park ecosystem measurably declines daily on many fronts. Every habitat acre today will provide incrementally less resources to wildlife each year into the future.

It is a clear objective of the Santa Monica Mountains Conservancy (Conservancy) as a trustee agency for this resource area to stabilize this ongoing spatial and qualitative habitat decline. All the subject habitat is habitat for mountain lion which is a candidate threatened species under the California Endangered Species Act. Substantial loss of this habitat may constitute a taking under that Act. The Conservancy adopted its Griffith Park Area Habitat Linkage Planning Map in December 2017 as a tool to address potential adverse impacts to resource area. The proposed zoo expansion project would eliminate or permanently alter over 30 acres of habitat in Habitat Block Nos. 39Q, 39R and 39s.

The exact science to empirically prove that the permanent loss of 30 acres (26 acres graded and 6 acres permanent fuel modification) of habitat will result in significant biological impacts relative to the greater Griffith Park ecosystem's long-term capacity to support sub-populations of multiple wildlife species does not exist. Perhaps more importantly, the project proponents cannot conclusively demonstrate that such permanent significant biological impacts cannot be avoided. Given the fragility of the

ecosystem, and the irreversibility of the proposed actions, the burden of proof should be on the project proponents.

Twenty-six of the 30 acres may be within the zoo boundary fence, but they nonetheless provide spatial buffer, nesting area, habitat for small prey, and habitat for reptiles. The loss/degradation of 30 acres of habitat in a habitat block that is strewn with roads and trails, is surrounded by development and freeways, and has marginal connectivity to the eastern Santa Monica Mountains, and perhaps even to the Verdugo Mountains via the Los Angeles River, based on this trustee agency's expertise is a significant biological impact that cannot be mitigated to a level less than significant. Equivalent acreage of contiguous developed area with structures would have to be converted to natural lands to mitigate this loss of habitat. The Conservancy contends that in no case can a Statement of Overriding Considerations be adopted to warrant the loss of 26 acres of habitat in the greater Griffith Park ecosystem. A housing development of 26 acres in this ecosystem would never not be considered an unavoidable significant adverse biological impact in this confined geographical area.

Only the Final Environmental Impact Report's (FEIR) Environmentally Superior Alternative avoids these significant biological impacts. The Conservancy opposes all other Alternatives. We urge City decisionmakers to understand that virtually all the zoo expansion project objectives can be obtained with Alternative 1. A telling fact is that of the 26 acres of chaparral proposed to be graded away, only 35 percent (9 acres) of those acres would be contributory to animal care. We urge the City to provide that added animal care area with creativity elsewhere in the existing zoo footprint. If an acre or two of chaparral needs to be destroyed to achieve better animal care, that impact should be mitigated by a high per acre habitat restoration ratio (not less than 5:1) on land contiguous with a Conservancy mapped habitat block. That mitigation for restoration must be geographically specific and include a detailed restoration plan, otherwise it is deferred mitigation.

Please send any correspondence to Paul Edelman, Deputy Director for Natural Resources and Planning at the above letterhead address or by email at [edelman@smmc.ca.gov](mailto:edelman@smmc.ca.gov).

Sincerely,  
  
Irma Muñoz  
Chairperson