



September 9, 2022

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

Re: Los Angeles Zoo Vision Plan Focused Recirculated EIR Comments

The Community Forest Advisory Committee (CFAC) was formed many years ago to improve the state of our city's urban forest by convening community representatives from the 15 council districts and a Mayor's representative. Committee members are chosen by their council member and appointed by the mayor to advise the city on practices & policies, and advocate on behalf of our urban forest. After reviewing the LA Zoo Vision Plan FREIR, listening to the feedback from the community, and touring the Zoo with staff to see the proposed areas of development in person, we have compiled our feedback and recommendations regarding Alternative 1.5 below.

To start, we thank the Zoo for permanently preserving the 201 protected tree and shrub species in the Africa Planning Area and for committing to the ongoing health of that 6 acre biologically significant area by making it a living laboratory for ongoing ecological education and restoration. To retain this area for native wildlife is a step in the right direction if Los Angeles is to reach its ambitious climate and biodiversity goals. We also applaud the Zoo's commitment to native landscaping throughout the Zoo. This much-needed visibility and promotion of native landscapes is timely and necessary.

CFAC also understands that there are certain circumstances whereby the long-term benefits of development can sometimes outweigh the initial cost, both financial and environmental. On the whole, we see how creating full ADA accessibility and a California-specific area of the Zoo-- featuring expanded animal exhibits, care facilities, and natural native landscapes-- can help the Zoo reach its educational mission of connecting the Los Angeles community to the mission of California species conservation. We understand that the ability to save species such as the peninsular pronghorn from extinction is dependent on large spacious enclosures, and the ability to have room to carry out breeding programs and the like. Furthermore, we value the fact that the potential future landscape of this proposed area would exclusively contain California native plants, both inside and outside of animal enclosures, which would help Zoo visitors experience native habitats and immerse them in our local ecology in a way that is far more impactful than what is currently on display.

That said, due to the fact that the proposed CA Planning Area is currently undeveloped and contains within it many mature trees and shrubs, construction work in this area is likely to cause a large disruption to the existing wildlife that has relied on this less-disturbed habitat as an escape from other more active areas of the Zoo. While we acknowledge that this habitat is located within the existing footprint of the Zoo and that much of this 16 acre habitat is comprised of non-native trees and plants, we also acknowledge that there are sections of the 16 acres which retain features of natural chaparral, with an abundance of native laurel sumac (*Malosma laurina*), some endangered Nevin's barberry (*Berberis nevinii*), and a handful of coast live oaks (*Quercus agrifolia*). This ridgeline is also contiguous with other areas of Griffith Park, and as such, the sensitivity regarding development in this area is high and deserves more careful design than the other areas of the proposed project.

As such, we are concerned to hear from the Los Angeles Audubon Society that the FREIR lacks evidence of adequate vegetation mapping for this area, something which was requested by the California Department of Fish and Wildlife (CDFW). Therefore, the ability to determine the appropriate mitigation measures for the project is seriously flawed, despite being required by CEQA. We request that per CDFW's request, the 16 acre area in question will be mapped and classified according to vegetation classifications in the Manual of California Vegetation, and that accurate mitigation measures be identified based on the results of that mapping.

Furthermore, CFAC understands that special events are a source of necessary funding for programs and operations, and that renovations and expansions to other event spaces within the Zoo, as well as the construction of the new Zoo Entry Garden and Park, would serve the purpose of generating much-needed revenue for the Zoo. However, we do not accept the necessity of the ridgetop California Visitor Center with its associated restaurant, meeting rooms, and shop. Nor do we accept the necessity of the campout zones or extensive picnic areas for additional special events in the California Planning Area.

While the Zoo reduced harmful impacts to protected trees by preserving the 6 acres within the Africa Planning Area for conservation, there have been no such harm reductions made regarding special event venues between the original project and Alternative 1.5. We are also perplexed as to why no mention of a ridgetop Visitor's Center was made by Zoo staff when we toured the site in person. We hope that this was not an intentional omission, though we specifically asked about event spaces. Regardless of the reason for such an omission, we feel that destroying the vegetation on the hillside and making large landform alterations for the development of the ridgetop California Visitor Center and other special event spaces is inappropriate for a number of reasons:

1. It means more of the hillside gets developed than is necessary for featuring California-specific animals and landscapes. Without the Visitor's Center and special event areas, the California Planning Area would have a smaller footprint, allowing for maximum flexibility to design the area to retain more wildlife connectivity and preserve priority areas of native habitat.
2. The Visitor's Center would be visibly prominent on the hilltop and protrude beyond the tree canopy with nighttime events creating light and noise which would be noticeable from nearby trails. Even though most of the trails close to hikers at sunset, the native animals of Griffith Park do not have the benefit of going indoors to avoid the noise or lights associated with

nighttime events. This has an unnecessary negative impact on Griffith Park's wildlife and goes against the ethics of California conservation and the stated ideals of the Zoo for creating a space which fosters a respect for our natural world.

3. The proposed "Yosemite lodge-style" visitor's center is also culturally insensitive and out-of-touch. It perpetuates settler/colonial tropes which harken to a not-so-distant past where native people in Yosemite were forcibly removed from their homelands and murdered to give way to gold-rush settlers, whose attitudes of ceaseless extraction and exploitation of nature is what set the stage for the current environmental crisis we're in. We don't think the Zoo would want to maintain the status-quo of erasing indigenous identity in California and replacing it with overused and outdated frontier nostalgia.

We should prioritize *only* the amount of development which is absolutely necessary for expanded animal exhibits, animal care, and for visitor safety. We encourage a creative reworking of the CA Planning Area which would reduce development to a fraction of the proposed 16 acres, and avoid developing the ridgeline altogether. Reducing the footprint in the California Planning Area would, in turn, increase the ability to protect existing habitat and wildlife from unnecessary harm, as well as greatly reduce carbon emissions associated with construction, which would be difficult (if not impossible) to recapture if the entire project were to move forward as planned.,

To sum up, CFAC's overall recommendations are as follows:

1. As required by CEQA and per the request of CDFW, ensure that a vegetation map is done for the 16 acres of the CA Planning Area which will most accurately identify the appropriate mitigation strategy for the project if any areas do get developed.
2. Reduce the footprint and scale of the CA Planning Area by eliminating all ridgetop development, including the California Visitor's Center and associated funicular, campout zones, and picnic areas. Prioritize lower parts of the hill for increases in animal-dedicated areas, and eliminate the excavation of Condor Corridor.
3. If absolutely necessary for pedestrian traffic, consider constructing a tunnel vs. a corridor/canyon, in order to preserve the ridgeline.
4. Utilize the vegetation mapping in order to design around trees.
5. Preserve as many mature trees as possible, and ensure proper protection of their root zones during construction.
6. Incorporate local indigenous voices in the planning, design, and implementation process, both to ensure cultural sensitivity as well as to provide potential educational opportunities. The Autry has created such a model with the Gabrieleno/Tongva Cultural Educators, and the Zoo would be wise to follow suit for the California Planning Area.
7. Require community review including substantive collaboration with CFAC and other community groups during the design and construction process.
8. Hire a design firm with ecological landscaping (i.e. not standard landscape designing) experience that will design around large existing trees, incorporate wildlife connectivity into the design, and retain maximum existing habitat.
9. Ensure a biologist, or ecologist will supervise all construction on site to reduce negative impacts on trees and tree roots.
10. Keep and repurpose all excavated dirt on site, without trucking it in or out. In other words, balancing the cut and fill so there is no excess that requires trucking out.

11. Set performance goals & trackable metrics for: tree removals, tree planting, biodiversity, appropriate limits on irrigation and water use, a commitment to maximize permeable surfaces (including green roofs), water infiltration and/or capture, limitations on fertilizer.

Although we are pleased with some of the improvements between the original project and Alternative 1.5, we feel that there is still more that needs to be done in order to lessen the harmful environmental impacts of the proposed project. We look forward to working more closely with the Zoo moving forward as the Vision Plan evolves.

Sincerely,

A handwritten signature in black ink, appearing to read 'Shelley', with a stylized flourish extending to the right.

Shelley Billik
Chair

CC: Councilmember Nithya Raman & staff
Carol Armstrong
Jake Owens
Jennifer Pope McDowell