

Communication from Public

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Comments for Public Posting: Honorable Council-members: The attached letter is respectfully submitted on behalf of Griffith Park Advisory Board



June 23, 2023

Hon. Eunisses Hernandez, Chair
Hon. John S. Lee
Hon. Heather Hutt
Neighborhoods and Community Enrichment Committee
Los Angeles City Council

Re: LA Zoo Vision Plan RFEIR – Council File # 21-0828

Dear Council Members:

For more than two years, this board has closely followed the Zoo's extensive EIR process, knowing that any future development plans will significantly impact Griffith Park and its visitors. From the start, we have focused on the transportation impacts of hundreds of thousands of additional Zoo visitors on existing park users. Our key question has always been whether the Zoo is committing to adequately mitigating the *significant and unavoidable* transportation impacts of its development.

With the latest revision, Zoo officials have made significant strides in recognizing and tackling issues raised by our board and other stakeholders. We appreciate these changes, which significantly improve the project. Thanks to leadership from Council District 4, Zoo officials have agreed to additional accountability measures related to Vehicle Miles Traveled (VMT) monitoring, reporting and reduction, beyond those already contained in the EIR. The Zoo will work with LADOT on development of this VMT program. As a result, we are pleased to offer our support for the Los Angeles Zoo Vision Plan Revised Final Environmental Impact Report (RFEIR).

As our previous letters have stated, it is important to allow the Zoo to fulfill its vision of modernizing to become a world-class destination. At the same time, given our board's purview and mandate, our focus has been on how the Zoo must adequately tackle the transportation impacts resulting from its project. Doing so is especially crucial as policy-makers grapple with the question of how best to move Griffith Park toward a shared vision of fewer cars and more transit options, particularly when faced with upcoming international events such as the FIFA World Cup and the 2028 Olympic Games. This challenge will require strong commitments from every relevant city department – the Zoo, Recreation & Parks, Transportation – and regional agencies such as Metro.

In considering the latest EIR document, we have examined the Zoo's plans through the lens of six principles outlined in [our letter](#) of September 20, 2022. As City Council members consider the merits of the project, we offer the following comments:

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Principle #1: Multi-modal commitments

Given the Zoo's projection of adding 750,000 visitors per year, the question of transit options – buses, shuttles, connections to rail, active transportation – has been among the most salient. In this area we are deeply encouraged by the Zoo's actions to date. Already, under leadership from Council District 4 and the Mayor's Office, plans are underway to resume the Parkline Shuttle with a direct link from the Metro B (Red) Line to the Zoo as a pilot Transit-to-Parks service. These plans feature strong cooperation among Zoo officials, LADOT and Recreation & Parks – precisely the sort of inter-agency coordination that will be essential in devising and building out transit infrastructure.

Further, we see plenty of substantive revisions to the RFEIR, including a big push in the area of active transportation: better bicycle facilities, a raised cycle track around the Zoo perimeter, and better integration with RAP's plans for surrounding roadways. Further, the RFEIR highlights the importance of buses and shuttles – including the prospect of direct service to/from Union Station, Burbank and/or Glendale. We fully endorse such regional strategies.

Principle #2: VMT target reduction

From the start of this process, our board [has pointed out](#) the importance of firm commitments for Vehicle Miles Traveled (VMT), which is the primary state-wide metric to assess development projects' transportation impacts. The initial EIR featured a Multi-Modal Transportation Alternative, known as Alternative 2, which set a minimum VMT reduction of 15 percent for both employees and visitors. While this standard is in line with goals set for other major projects, it would still mean a large increase from present, since the "reduction" is based on otherwise-anticipated increases due to the large uptick in overall attendance¹. Our board has [advocated](#) for this 15 percent standard as a means to drive sufficient change in how hundreds of thousands of additional Zoo visitors will arrive.

In response to previously expressed concerns about the lack of sufficient VMT commitments, the RFEIR states a VMT reduction goal of "ideally" 15 percent by 2040. We trust that Zoo officials are serious in stating this goal, and we appreciate the spirit behind it. At the same time, a goal is not the same as a requirement. In fact, the RFEIR states on both 3-15 70 – 71 and 9-71 that the Zoo would be held to a very different standard: a 10 percent VMT reduction for employees, and no specific numeric requirement ("maximum extent feasible") for visitors. This language is unchanged from the initial EIR.

While we recognize the analysis by the Zoo and Bureau of Engineering regarding challenges in meeting the 15 percent VMT reduction standard, we believe it is essential for this project to have specific mitigation targets with benchmarks along the way. We are therefore pleased that Council District 4 has received commitments from Zoo and LADOT leadership to create a VMT

¹ Without mitigation, VMT would increase 61 percent by 2030 and 71 percent by 2040, according to RFEIR 3.15-60



monitoring, reporting and reduction plan as an outgrowth of the EIR approval process. Such a plan will ensure that the good-faith efforts of the Zoo's leadership team are translated into tangible results and accountability measures with appropriate benchmarks along the way.

Principle #3: Car capacity limits and PVMP details

Given the Vision Plan's reliance on an online reservation and parking system, known as Peak Visitation Management Program (PVMP), we had suggested a limit to the number of cars that would be allowed – per day or per year – under this program. While the latest revision does not include such limits, we see other positive revisions to the PVMP program that give us much greater confidence in its role as a useful tool to manage Zoo visitation – particularly the new interplay between the Transportation Demand Management program (TDM) and PVMP. We would, however, point out once again that a program specifically designed to maximize visitation (4-103) and efficient use of the parking supply (9-40) requires close monitoring as part of a transit mitigation strategy.

Principle #4: Oversight from LADOT for both TDM and PVMP

One of our biggest issues with the prior EIR draft was a lack of clarity or accountability regarding the Transportation Demand Management (TDM) program, as well as PVMP. Given that TDM is the driving force in managing how visitors arrive at the Zoo, the new draft is much better in ensuring that these two key programs work together, particularly with oversight and support from LADOT, as outlined above. We are especially pleased by the commitment on 4-146 to “adaptively manage” TDM and “better integrate” the two programs. The latest draft also contains important revisions regarding baseline VMT measurement; the inclusion of nighttime events; and tracking peak hours/days to inform PVMP. Again, we recognize that the success of the TDM program will be in taking robust user data and finding smart, creative ways to enable and encourage visitors to arrive at the Zoo via means other than private vehicles. Doing so is in line with both the Zoo's Vision Plan and the City of LA's [Vision for Griffith Park](#).

Principle #5: Response to ecological concerns

Although our board has focused primarily on transportation, we have acknowledged the concerns raised by numerous organizations regarding the ecological impacts of this project. Without re-stating those concerns here, we recognize that there will continue to be differing points of view on the level of ecological mitigation required of the Zoo for its Vision Plan. Given that this board's explicit purview and mandate is Griffith Park, we have to balance the reality that the Zoo's land and internal footprint is distinct and separate from that, while understanding that changes on Zoo grounds will have potential implications and ramifications on the surrounding park as a whole. Our greatest hope is that policy-makers recognize the manner in which changes to one part of the Griffith Park ecosystem impact others, and act accordingly. As

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such, we are pleased to see that the RFEIR explicitly states that Recreation & Parks – and therefore its urban ecologist – will have a meaningful role in solving questions of how best to mitigate ecological impacts resulting from the Zoo’s development. Our board will continue to keep watch on how the Zoo’s Vision Plan is implemented from an ecological point of view.

Principle #6: Overall accountability for transportation

We are pleased to say that the FREIR is more robust and specific in outlining the ways in which the Zoo will be held accountable for its transportation commitments. The language on annual reporting requirements, in particular, is a welcome revision.

Conclusion

After more than two years of deep analysis, as well as numerous substantive conversations with Zoo executives and members of the project team, we greatly appreciate the revisions that have made this project significantly better than at the start of the process and the work that has been done to address our concerns. With specific VMT commitments, to be developed as part of the multi-agency program outlined above, our board has voted to offer our support of the LA Zoo Vision Plan RFEIR.

Lastly, we would like to express our gratitude to City Councilmember Nithya Raman and her staff for their leadership in addressing transportation and other key issues, and we remain committed to working with Zoo officials, other City of LA agencies and stakeholders to ensure that the LA Zoo Vision Plan implementation is carried out as responsibly as possible.

Sincerely,



Michelle Crammes
Chair, Griffith Park Advisory Board

cc: Hon. Nithya Raman and staff
Recreation and Parks Commissioners
Jimmy Kim, Matthew Rudnick, Brenda Aguirre, Stefanie Smith – RAP
Randall Winston, Jacqueline Hamilton, Dan Rodman – Mayor’s Office
Matt Szabo, City Administrative Officer
Denise Verret, LA Zoo
Carol Armstrong, LA Zoo