

Your Community Impact Statement has been successfully submitted to City Council and Committees.

If you have questions and/or concerns, please contact the Department of Neighborhood Empowerment at NCsupport@lacity.org.

This is an automated response, please do not reply to this email.

Contact Information

Neighborhood Council: Los Feliz Neighborhood Council, Los Feliz Neighborhood Council

Name: Jon Deutsch

Phone Number: (213) 973-9758

Email: jon.deutsch@loshelznc.org

The Board approved this CIS by a vote of: Yea(16) Nay(0) Abstain(0) Ineligible(0) Recusal(0)

Date of NC Board Action: 09/20/2022

Type of NC Board Action: Against unless Amended

Impact Information

Date: 09/28/2022

Update to a Previous Input: No

Directed To: City Council and Committees

Council File Number: 21-0828

Agenda Date:

Item Number:

Summary: Please see attached letter (.pdf) containing the comments of the Los Feliz Neighborhood Council on the Los Angeles Zoo Plan/EIR.



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Misty LeGrande - Communications

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Jon Deutsch

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Dan McNamara - Administration

SECRETARY
Amanda Blide

September 21,, 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
Norman.Mundy@lacity.org
-VIA EMAIL-

Re: Comments in response to LA Zoo Vision Plan Focused Recirculated EIR

Dear Mr. Mundy,

The Los Feliz Neighborhood Council is pleased to submit these comments on the LA Zoo Vision Plan Focused Recirculated EIR. We are proud to have Griffith Park within our council district. And we appreciate the opportunity to respond to the Zoo's new Alternative 1.5 for its Vision Plan.

First, we recognize the vast amount of work that the Zoo has put into this Vision Plan, and we appreciate the Zoo's careful consideration of public concern about the Final EIR circulated last year. In many ways, the Recirculated EIR responds to those concerns. For instance, we are pleased that Alternative 1.5 protects some of the existing Coast Live oak trees within the Zoo footprint by leaving undeveloped the hillside in the Africa exhibit area. And we applaud the Zoo for excluding from Alternative 1.5 its proposed construction of a parking structure and the aerial tram, both of which would violate the Griffith Park Vision Plan and are inconsistent with the urban wilderness identity of the park. We also appreciate that Alternative 1.5, according to the EIR's analysis, would be environmentally preferable to the previously analyzed plan alternatives. We also recognize the tremendous educational and recreational benefits the Zoo provides our neighbors. And we applaud the Zoo for prioritizing those educational benefits in this Alternative.

However, we remain concerned and unclear about a number of aspects of Alternative 1.5 and the Zoo's process for finalizing its Vision Plan. As a preliminary matter, the 45-day comment period is insufficient to adequately respond to the 332-page document. Alternative 1.5 reflects a significant change in the Zoo's approach to its Vision Plan. While the document describes this new alternative, it does so in broad and sometimes vague terms, making it challenging and time-consuming to understand the alternative's parameters and the differences between it and previously analyzed alternatives. As we explained in our August 16, 2022 extension request, we need more than the 45-day comment period to fully understand and respond to the recirculate EIR in a way that reflects the diverse perspectives of our constituents. We reiterate, therefore, our request to extend or reopen the comment period and provide more opportunity for the public to learn about the Zoo's plans.

With respect to the substance of the Recirculated EIR, we have multiple concerns and questions focused around 6 categories of impacts:

- We are concerned about the metrics of selecting the most environmentally preferable approach: It is important that the Zoo approach its Vision Plan in the most environmentally sustainable manner possible. The Recirculated EIR concludes that Alternative 1.5 is the environmentally superior alternative. However, the analysis does not clarify the full environmental impacts of Alternative 1.5. And it is unclear to what extent the different caps on annual visitors are driving the analysis of which alternative is environmentally preferable.
 - When considering how something is more environmentally superior, has the Zoo considered the following: carbon released from soil excavation; diesel truck emissions from moving soil; emissions from concrete that will be paved over soil; lost carbon capture from destroyed trees; or other factors besides a reduction of VMT supplied by the PVMP program? (See GHG-1, 4-125.) In addition, the analysis does not appear to address the net-zero air quality plan for Public Works. (See AQ-1, 4-108-109.)
- The Board would like to see the Zoo reduce waste and use of single-use plastics: We are concerned that the recirculated EIR does not include a plan to reduce waste of visitors at the Zoo.
 - Is composting only specific to the organic waste of the animals or also of the visitors? Since California plans to reduce organic waste going into landfill by 75% by 2025, it is important that the Zoo facilitate this effort by encouraging compost of food waste. (See p. 131 of the FREIR.)
 - In addition, how will the Zoo reduce or eliminate the use of single-use plastic?

- The physical alteration of the park requiring blasting and excavation of hillsides and other parts of the land would be detrimental to the ecology, and flora and fauna in the Zoo and the park: The California area, zoned as open space, currently has endangered native trees. Under Alternative 1.5, the Zoo plans to replace these trees with young trees in its construction of Zoo exhibits. But this will permanently alter the ecology of the area that has taken many years to develop, and will greatly impact the local wildlife. Additionally, this Alternative is inconsistent with the city's current plans to preserve the urban tree canopy. Most concerning is the proposal to excavate and blast a ridgeline in order to expand the Condor Canyon exhibit. This part of the proposal would result in 6,000 diesel trucks hauling dirt through the park, a significant impact on the local geology, including watersheds and water flow, accelerate erosion of the area, and the aesthetic appearance of the park. It would also conflict with the proposed Wildlife Ordinance, which prioritizes the preservation of ridgelines.
 - What analysis has been done as to whether the excavation of the Condor Canyon area would result in an increase in landslides or flooding? (See WF-4, 4-153; GEO-3, 4.) Has the Zoo assessed whether any endangered birds would be impacted by the destruction of trees in California and the hillside in Condor Canyon? What analysis has there been on how paving over wildlands and destroying trees in the California area would contribute to drought and increases in heat in the park, thus increasing wildlife exposure? [WF-2, 4-151]
 - Treetops and the Elevated Visitor Center would impair the tree canopy and negatively affect wildlife: The urban tree canopy would be altered by the construction of taller structures such as the Treetops Terrace Visitor Center and California Visitor Center, which would extend above the urban forest canopy within the Zoo. What revisions, if any, are there to the size of the "treetops" feature? Has there been an assessment of how the "treetops" would impact the local birds including the raptors? We are concerned that Section BIO-2 does not assess whether the large buildings (treetops, etc.) would affect the movement of birds. Millions of birds die each year from hitting tall structures. What mitigation efforts would the Zoo use to prevent impacts to wildlife? Has there been any analysis on how the shade of the tall buildings would result in the deaths of trees due to blocking sunlight?

- The lack of multi-modal transportation options would put stress on the traffic in neighborhoods around the park and result in a large increase in greenhouse gas emissions: The current project options presented would result in an increased carbon footprint without remediation.
 - Has the Zoo attempted to communicate with City Parks or neighboring cities to create a mutually beneficial plan that would increase alternative

transportation options? Are there any plans to allow Angelenos that do not have access to a vehicle to attend the Zoo?

- o Has there been any analysis done on the impact on regional traffic due to possible future events and are there any plans to alleviate traffic for events, for instance with shuttles?
 - o Has there been any direct outreach with neighborhoods that would be directly impacted due to increases in traffic?
 - o What are the “measures to expand transit service”? [4-143]
 - o What mitigation efforts will be implemented to reduce the increase in hazards to park goers, cyclists, and pedestrians due to an increase in diesel trucks (6,000), increase in special and nightly events, and increase in opportunity for drunk driving collisions? [T-3, 4-144]
- The Zoo should be focused on accessibility and equity: We encourage the Zoo leadership to make the Zoo more accessible to all Angelenos. For instance, the Zoo could model itself on our nation’s flagship Zoo, the Smithsonian National Zoo, which is free for all patrons and is accessible by public transportation. As a result of the Vision Plan, will the zoo increase ticket prices? What low-cost options for eating, etc., will still be available? In addition, we want to ensure that the Zoo has contacted and sought feedback from indigenous groups in developing and revising the Vision Plan.
 - Animal welfare should be prioritized, since the Zoo is a place for conservation: A proposed increase of nighttime events at the Zoo would be highly disruptive due to nighttime lighting, and increased evening vehicular traffic, and noise. As well, an increase in animals in the expanded exhibits would defeat the goal of improved animal welfare in the expanded Zoo.
 - o We are concerned that the Zoo’s plan would “result in the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, or candidate species, or a Species of Special Concern.” (See 4-112.) This would run counter to the Zoo’s biodiversity goal. What mitigation efforts would be in place to prevent this?
 - o The Zoo has stated that it will be acquiring additional animals for exhibits as it expands. What animals will it be acquiring and how? Will the enclosures be expanded solely to add animals to the enclosure? And what are “immersive” exhibits?
 - o Noise and light pollution can affect the activities of flora and fauna. What mitigation efforts will be put in place to reduce effects of lighting on flora and fauna in the park and in the Zoo? (See 4-108.) Will there be a limit on the noise levels for special events, and what mitigation efforts will be put in place to reduce noise levels? (See NOI-1, 4-136.)

Thank you again for the opportunity to provide feedback on the Zoo's Vision Plan and its new Alternative 1.5. We look forward to continued dialogue as the Zoo further develops its plans. And we reiterate our request for an extension or reopening of the comment period so that we can assess Alternative 1.5 more thoroughly.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jon Deutsch". The signature is stylized and written over a horizontal blue line that spans the width of the signature area.

Jon Deutsch, President
Los Feliz Neighborhood Council