

Communication from Public

Name: California Native Plant Society LA/SMM Chapter
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Comments for Public Posting: Please see attached letter from the Los Angeles / Santa Monica Mountains chapter of the California Native Plant Society.



Los Angeles / Santa Monica Mountains Chapter

15811 Leadwell Street Van Nuys, CA 91406-3113

November 11, 2021

Councilmember John Lee, Chair Arts, Parks, Health, Education, and Neighborhoods (APHEN)
LA City Council c/o City Clerk
200 North Spring St, Room 395
Los Angeles, CA 90012

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

Dear Councilmember Lee and APHEN committee members:

The California Native Plant Society (“CNPS”) is a science and policy-based interest group, with more than 50 years’ experience in the environmental field and numerous local chapters. Our organization protects California’s native plant regime and works to preserve it for future generations. We accomplish this goal through engagement with policymakers, scientists, and local planners, where we advocate for well-informed, environmentally prudent policies and land practices. Further, the Los Angeles / Santa Monica Mountains Chapter of CNPS, which is submitting this public comment, has over 400 members and extensive background in local environmental matters. As pertinent here, our chapter and many of its members have direct experience with the proposed project area and surrounding region. Such activities include: (1) 30 years of restoration in State Parks, the Santa Monica Mountains, and local wildlife corridors, (2) field studies of rare, threatened, endangered native plants and habitats in the region, and (3)

ongoing native plant hikes through the Santa Monica Mountains, Simi Hills and other natural areas around the San Fernando Valley.

We write to your council to express our deep concerns about the Zoo's Vision Plan, as presented by the project's Final Environmental Impact Report ("FEIR"). This document, along with recent comments by Los Angeles Director Denise Verret in the Los Angeles Times, demonstrates a deeply problematic disregard for the sensitive native ecology within, and adjacent to, the Zoo. On the basis of this environmental damage by the Vision Plan, CNPS strongly urges Councilmembers to reject that option and instead accept Alternative 1, as described in the Project's FEIR.

As you know, the Los Angeles Zoo is steward to numerous acres of critical habitat in the eastern Santa Monica Mountains. These areas are comprised of Coast Live Oak woodland, Southern California Black Walnut woodland, and Laurel Sumac-dominated shrubland. 25 of these acres of this habitat would be irreparably damaged by the zoo's expansion, affecting 120 coast live oaks, 60 toyons, and 22 California black walnut trees — all of which are City of Los Angeles Protected Trees/shrubs under the Protected Tree Ordinance (*see* FEIR & Los Angeles Municipal Code).

On its face, the proposed project violates the Ordinance because it will rely solely on replanting as mitigation. And mitigation in the form of replanting takes numerous decades for tree size, attributes, and ambient ecosystem services provided by the native trees to be realized. This is even more concerning in our era of climate change. And at any rate, the proposed mitigation is insufficient to replace a walnut-type woodland that the California Department of Fish & Wildlife itself designates as a rare habitat. As the FEIR explains, native habitat

communities would likely be “eliminated or substantially altered” in the expansion areas (*see* EIR 3.3-49).

Consider the City Biodiversity Report, Biodiversity Index, L.A. Sustainable Development Goals for Biodiversity, and the L.A. Green New Deal — this Vision Plan is clearly antithetical to the goals of these programs and reports. We know that, as explained by the Vision Plan FEIR, 17 sensitive or special-status plant and wildlife species are either known to be present or have a moderate to high potential to be present based upon historical records. Such species populations in (and adjacent to) the zoo acreage would be eliminated (or at best severely threatened) by the proposed expansion.

CNPS also believes that the Vision Plan, if enacted, would compromise integrity of the eastern part of the park, which is one of few wildland areas accessible to low-income neighborhoods. The FEIR refers to this acreage as “underutilized and underdeveloped areas of the Zoo,” but this characterization fails to appreciate the ecological (and societal) benefits of Griffith Park’s rare local woodland (*see*: Executive Summary and 3.3 Biological). To wit, the project would disrupt key wildlife linkage from the eastern Santa Monica Mountains to the rest of the range extending west to the Pacific Ocean.

And further, construction activities would permanently affect soil, above ground, and transitory biodiversity from large equipment, compaction, and cut/fill activities. Such practices invariably (1) alter soil chemistry, morphology, infiltration, seed bank, micro-organisms, nesting sites, and increase non-native flashy fuels, (2) introduce invasive species that will outcompete with native species, and (3) permanently and deleteriously change growing conditions for native plant communities, especially keystone & sensitive species. Lastly, the project would undermine

an ecosystem already threatened by climate change, through severe vegetation removal that will take decades to grow to the age class of current vegetation and forest benefits.

In short, the destruction of rare woodland and precious chaparral, all for a different tourist “experience”, undermines both our city government’s vision for the city itself, and indeed, the way its residents and the world view the city. And as a matter of logic, it strains belief that the Zoo would destroy acres of woodland habitat and blow a prominent ridgeline down to bedrock (to create a faux canyon, no less) all in the name of “conservation.” Indeed, we must emphasize that the Zoo is more than a recreational hotspot for tourists; instead, it is charged with the roles of conservation, sustainability, and education. And it is also charged with fulfilling the vision Griffith J. Griffith, the founder of Griffith Park, whose gift of the parkland was intended to both leave it as accessible to all Angelenos AND to protect its inherent resources. Protecting these rare woodlands, few of which are left in the City of Los Angeles, is clearly the Zoo’s responsibility — and the Vision Plan, if enacted, would constitute an undue abdication of that charge.

CNPS thus encourages the City Council to adopt Alternative 1 as the only acceptable proposal for the zoo’s expansion, because it will help elevate the Zoo’s profile and capacity in a responsible, sustainable, and ecologically ethical manner.

Sincerely,



Joseph E. Farewell
Conservation Co-Chair; Los Angeles / Santa Monica Mountains Chapter
California Native Plant Society