



## Griffith Park Advisory Board

*Community Stewards of LA's Largest Park & Great Urban Wilderness*

Department of Recreation and Parks, City of Los Angeles

[www.laparks.org/griffithpark/advisory](http://www.laparks.org/griffithpark/advisory)

August 16, 2021

Hon. John Lee, Chair

Hon. Mike Bonin

Hon. Mark Ridley-Thomas

Arts, Parks, Health, Education, and Neighborhoods Committee

Los Angeles City Council

Re: LA Zoo Vision Plan EIR – Support for Alternative 2 (Multi-Modal Transportation Alternative)

Dear Council Members,

The LA Zoo Vision Plan outlines a 20-year construction program to modernize and create a world-class facility that will draw visitors from across the region and around the world. These are worthy ambitions of great consequence: The Zoo intends to add roughly 1.25 million annual visitors to a congested section of our city on the edge of Griffith Park, leading to *significant and unavoidable* impacts that would directly challenge existing City of Los Angeles policy on transit and transportation.

While we wish to support the LA Zoo, as articulated in [our response to the draft EIR](#), we urge policy-makers to take appropriate steps to reduce the transportation impacts from this influx of new visitors. The Zoo projects that vehicle miles traveled (VMT) will rise 72 percent for visitors and 93 percent for employees by 2040. If City Council members do not require sufficient mitigation, the result will be a step backward – for Griffith Park, its users, and the entire region.

Fortunately, there is a clear path to mitigate these impacts: The Final EIR presents the Multi-Modal Transportation Alternative (Alternative 2) as meeting all project objectives and reducing environmental impacts in seven of 17 measured categories. This alternative, developed in close consultation with the LA Department of Transportation, sets reasonable mitigation targets and proposes meaningful investment in alternate modes of transport. We urge the City Council to require the transportation mitigation measures contained in Alternative 2 in order to approve the LA Zoo Vision Plan.

*BOARD MEMBERS: Chair – Jason Greenwald; Vice Chair – Michelle Crames; Secretary – Chris Laib;  
Past Chair – Ron Deutsch; Gene Gilbert; Mike Hain; Alex Phillips; Karen Thornton*

While the LA Zoo is administratively separated from the rest of Griffith Park, it is directly contiguous to more than 4,000 acres of urban wilderness and regional city park. As such, the Zoo's impacts on the park and its users must be considered. Our board was created as a result of City Council policy that sought to ensure a meaningful voice for stakeholders in decisions impacting Griffith Park. Five years ago, we supported Recreation and Parks (RAP) officials who cited traffic congestion as a top priority and stated, "significant changes must take place to ensure the future safety and efficiency of Griffith Park" (RAP Board Report 16-186). For the Zoo to add roughly 1.25 million annual visitors without adequate transportation mitigation would directly contravene those goals.

Earlier this year, following our extended discussion with the project team, we were hopeful the Zoo would pursue the measures in Alternative 2, which we stated as a condition of our support. After all, the rationale is self-explanatory: "Without investments in multi-modal transportation infrastructure and equipment and targeted incentives and public information to change travel behavior, additional trips to the Zoo under the Project would continue to be made largely by [private] vehicle" (Final EIR, 4-87).

Yet in the end, the Zoo rejected Alternative 2. In the findings of fact that accompany the Final EIR, the Bureau of Engineering, as the lead agency, states: "The City finds this alternative less desirable than the proposed Project" (Page 8-3). Yet the basis for rejection can be distilled to two points, neither of which survives close examination: 1) that Alternative 2's reduced impacts would still be "significant and unavoidable" and 2) that the cost might be too great.

First, as to impacts: Alternative 2 would mandate a 15 percent reduction in VMT, as compared to the originally proposed project. While it would still represent a huge increase in both visitors and private vehicles, it would nonetheless pave the way for significant, inter-jurisdictional investment in precisely the kinds of transportation and transit strategies that city policy-makers have long championed: shuttle buses, linkage to the regional transportation network, increased bike and pedestrian access, incentives for employee carpooling, transit use and telecommuting. Unlike the Zoo's proposed project, Alternative 2 sets hard targets that would apply to both employees and visitors. As a result, what might otherwise simply be a wish list of hoped-for projects could instead be a viable program.

The Zoo points out that Alternative 2 would "substantially" expand the use of transit, bicycles, walking and ridesharing, and would "substantially" reduce total Zoo VMT, leading to reduced environmental impacts in these seven categories: aesthetics and visual resources; air quality; energy; greenhouse gases and climate change; land use and planning; recreation; and transportation (Final EIR, 4-21 - 4-22). Again, all project objectives would be met; the only material difference would be a smaller parking garage. It is disingenuous for the Zoo to ignore these benefits simply because some impacts remain. The mandated reduction in VMT – and the transportation strategies to achieve it – would be in line with policy-makers' ongoing efforts to support alternate modes of transit and a more sustainable city.

The economic argument against Alternative 2 similarly fails to withstand scrutiny. While the findings of fact state that transportation improvements “would be costly” and “present challenges in terms of economic feasibility,” these statements are made in a single sentence without underlying analysis. It is simply not credible for the Zoo to make this argument without a detailed economic analysis to enable policy-makers and the public to judge the merits of mitigation against any added cost. To that point, the Zoo proposes to spend \$650 million on the first three phases of its expansion – dollars said to be raised through such means as grants, fundraising, and collaboration with other agencies. If such investment is feasible for the project, isn’t it reasonable for policy-makers to require a robust commitment to transit?

Again, we are not calling for the LA Zoo to downsize its ambitions to serve as a world-class facility that will draw families from across the region and around the world. We are merely asking the Zoo to be partners in a shared vision of our city with more transit, fewer cars and a meaningful commitment to sustainability. At a time when the urgency and inequities of climate change are all-too-clear, we urge the City Council to embrace Alternative 2 as the only truly responsible and appropriate path forward.

Sincerely,



Jason Greenwald  
Chair, Griffith Park Advisory Board

cc: Hon. Nithya Raman and staff  
Recreation and Parks Commissioners  
Mike Shull, AP Diaz, Matthew Rudnick, Stefanie Smith -- RAP  
Rich Llewellyn, Mayor’s Office  
Matt Szabo, City Administrative Officer  
Karen Winnick, Zoo Commission  
Denise Verret, LA Zoo