



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

February 12, 2021

Mr. Norman Mundy
Los Angeles Bureau of Engineering
1149 S. Broadway, Suite 600, Mail Stop 939
Los Angeles, CA 90015
Via email to: norman.mundy@lacity.org

Re: LA Zoo Vision Plan EIR Comments

Dear Mr. Mundy,

Thank you again for joining us, along with Darryl Pon and Erika Leachman, at our January meeting. We appreciated the presentation and dialogue, which were both informative and productive. We are submitting this formal comment letter on the Zoo Vision Plan's Draft Environmental Impact Report.

Our board is on record in supporting the Zoo's goal of becoming a world-class facility, and we reiterate that support today. Yet we have a number of concerns about a project that will add roughly 1.25 million visitors annually to a venue that sits at the edge of a 4,000-acre-plus urban wilderness area. The Draft EIR acknowledges that the project's transportation impacts will be *significant and unavoidable*. We would like to work with the project team to further mitigate the impacts on Griffith Park.

Already, the LA Zoo hosts just under 1.75 million visitors per year. The Draft EIR states that total could rise to 3 million by the middle of the next decade. Allowing the bulk of these visitors to continue to arrive by private vehicle is in conflict with city policy-makers' current direction and world-wide best practices. We strongly urge the project team to re-examine its transportation assumptions and conclusions – as laid out in this letter – in order to revise the project so that we can support it.

For years, city officials have sought to widen the range of ways that people may access Griffith Park, with the aim of reducing the number of private automobiles in and out of the park. Five years ago, Recreation and Parks (RAP) officials cited traffic congestion, parking demand and safety concerns in stating, "significant changes must take place to ensure the future safety and efficiency of Griffith Park" (RAP Board Report 16-186). Since then, the urgency has grown.

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

While we recognize the administrative boundaries separating the Zoo from RAP, the physical space of Griffith Park knows no such bounds. Thus, aggressive steps are needed to drastically reduce vehicle impacts from the Zoo's expansion.

We therefore view Alternative 2 – the project alternative with mandated transportation mitigation goals – as a baseline from which to start, rather than an end point. As laid out in this letter, a 15 percent “reduction” in vehicle miles, based on figures reflecting an additional 1.25 million visitors per year, is a huge increase from current totals – and a direction that diverges greatly from policy-makers’ efforts to reduce the number of private vehicles in Griffith Park.

As you know, our board previously raised concerns during the scoping process about a number of issues, including habitat loss and potential impacts related to expanded nighttime events. While we retain these concerns, we will focus our formal comments on transportation impacts. We look forward to the project team’s response to the following:

Transportation Mitigation Goals/Transportation Demand Management (TDM) Program

- Increasing vehicle miles traveled (VMT) by 72 percent for visitors and by 93 percent for employees by 2040 is – as the EIR states – “inconsistent with the adopted state, regional and local planning framework” (3.15-60). What additional measures has the project team considered - and what further measures will it consider - beyond the 15 percent “reduction” in Alternative 2?
- Given that the transportation study shows cumulative visitor growth rates of 27 percent by 2025 (to more than 2.2 million annual visitors) and 61 percent by 2030 (to more than 2.8 million), what steps has the project team considered to ensure that mitigation measures are undertaken quickly enough to offset these front-loaded visitation increases?
- The mode share targets for Alternative 2 (5 percent in 2025, 10 percent in 2030, 15 percent in 2040) show the vast majority of visitors continuing to arrive by private vehicle – a policy that would be in direct conflict with policy-makers’ efforts to reduce automobiles in Griffith Park. We urge the project team to increase these targets to better mitigate project impacts.
- The transportation assessment states that the Transportation Demand Management (TDM) program shall endeavor to reduce vehicle miles traveled “to the greatest degree possible” and “to the maximum extent feasible.” (Appendix N, 56 – 57) To the best of your ability, please quantify these reductions beyond the stated target of 10 percent for employees and no specific target for visitors.

- The report states that specific VMT reduction strategies will be finalized during review and approval by the City of Los Angeles and LADOT, and that RAP will be consulted “if required” for measures affecting Griffith Park. We would like to codify that requirement, and we request to be included in the process.
- The report states, “The Zoo shall invest in its TDM program as necessary to achieve the maximum possible reduction in VMT.” (Appendix N, p. 61) With this statement in mind, what level of funding is the Zoo prepared to commit to its TDM program and other transportation mitigation strategies? What will be the annual TDM budget?
- The EIR states that the TDM coordinator “shall consider” a range of measures, yet the report is silent on requiring those measures. What guarantees is the project team prepared to provide as to the implementation of specific measures?

Specific Transportation Mitigation Measures

- Parkline Shuttle:
 - The report states the Zoo will provide funding “in amounts as determined appropriate” to help connect the Parkline Shuttle to Metro B Line Vermont/Sunset and Metro B/G Line North Hollywood. Please clarify the Zoo’s commitment to this expansion and the level of funding it is prepared to put forth.
 - Related, please clarify how the Zoo proposes to assess proportional share funding for any such expansion.
 - The report proposes expansion of shuttle service as a pilot program during high-demand periods such as holidays. Please clarify the metrics by which such a pilot would be deemed successful enough to expand to weekends and, ultimately, weekdays.
- Union Station Shuttle
 - The project team rightly points out the challenges of reaching the LA Zoo via transit and proposes shuttle service from Union Station as one potential solution. We strongly support this proposal and urge the Zoo to commit more fully to its implementation.
 - Please clarify the level of funding the LA Zoo is prepared to commit – and the timetable by which it will do so – to ensure that the feasibility study can be completed rapidly and the pilot program can be successful.

- Please provide greater clarity regarding the ultimate aim of such a program, in terms of levels of service, weekday/weekend availability, and means to ensure accessibility and equity for all Zoo visitors.
- Metro Bus Service
 - Please elaborate on the manner in which the Zoo will coordinate with Metro regarding expansion of bus service to the Zoo bus stop.
 - Please clarify how the Zoo proposes to assess proportional share funding, and any additional resources (such as marketing) the Zoo is prepared to put forth.
 - Please elaborate more specifically on the level of funding the Zoo will commit (Appendix N, p. 58) to increase bus service frequency.
- Park and Ride
 - Remote parking (aka Park and Ride) is absent from consideration in the Draft EIR, to its detriment. We strongly encourage an analysis in the Final EIR of a Park and Ride system featuring remote visitor parking outside of Griffith Park.
 - To what extent has the project team consulted with RAP and/or DOT regarding existing and planned efforts to expand remote parking and how best to coordinate?
 - To what extent has the project team studied other successful Park and Ride programs, such as at the Hollywood Bowl and/or national models for other urban wilderness areas?
- Metrolink Shuttle
 - Has the project team explored the feasibility of a shuttle to/from the Glendale Metrolink station as an additional transit option for visitors? Please explain why or why not.
- Bicycle/Pedestrian improvements
 - What level of funding, and what specific commitments, is the project team prepared to provide with respect to the many potential bicycle/pedestrian improvements outlined in the Draft EIR?
 - Please share further details regarding any planning and coordination for the potential bicycle and pedestrian bridge across Colorado Boulevard.

- Will the Zoo consider discounted tickets for cyclists, in the same way it contemplates them for transit-users?
- Many of the proposed mitigation measures, both those listed above and others, are discussed as a menu of options, or a toolkit, and are discussed generally. Please share any commitments to specific measures beyond the statements of intent that are made in the Draft EIR.
- The Transportation Assessment states that potential AQMD funding could enable the Zoo to undertake transit improvements “not conceived in this study.” (Appendix N, p. 62) What sort of improvements might such funding enable?

Collaboration with other agencies

- Would LA Zoo be willing to enter into a memorandum of understanding with relevant City of LA departments (e.g. RAP and Department of Transportation) in order to solidify the details of some of its potential commitments as part of the entitlement process?

Monitoring and Accountability

- What accountability measures will ensure that promised targets are adhered to? Does the Zoo contemplate annual traffic counts, financial penalties and/or other means of enforcement?
- Is the Zoo prepared to tie some of its development rights to the implementation of specific mitigation measures?
- As an example, the construction of the planned parking garage might be allowable only based on specific reductions in VMT and/or transportation mitigation milestones. Our board would be happy to work with the project team and others on what some of these milestones might be.
- The report states that annual reporting will be conducted by the TDM coordinator, who may be an LA Zoo employee or contractor. We believe independent monitoring and/or reporting will provide greater transparency and confidence. Please comment.
- By what means will interested stakeholders be able to assess and offer feedback on the TDM program and other transportation mitigation measures? How will such feedback be integrated into ongoing mitigation efforts?
- How will the unique needs of horse riders be taken into account, both during construction and ongoing, in assessing the impact of planned transportation changes?

Parking Garage

- Would you confirm the statement made by a zoo official at our January meeting that any decision to build the planned parking garage would require further study?
- If so, would you characterize the type of study – and the review & approvals required – in the event visitor figures support the Zoo’s plans to move forward with a parking garage during phase 7?
- The Alternatives Analysis states that the “exact size and design is not known at this time,” yet the Transportation Assessment indicates that the project intends to add roughly 1,750 parking spaces. Please clarify the size and scale of the parking garage as allowable under Alternative 2.

Nearby Traffic-Impacted Areas

- Los Feliz Blvd. and Crystal Springs Drive is a heavily impacted intersection just south of Griffith Park. Given the number of local Zoo visitors who travel through this intersection, the Draft EIR suffers from its omission in the transportation study.
- Park users and local residents alike are already familiar with long back-ups and frequent congestion at peak times. Yet the project would add hundreds of peak period trips – during both weekday rush hour and crowded weekends – starting almost immediately (Appendix N, p. 46). What assurance can the project team offer to park users and local residents that these additional vehicle trips will not meaningfully worsen quality-of-life?

“A Vision for Griffith Park”

- [“A Vision for Griffith Park,”](#) prepared under the auspices of RAP and Council District 4, and approved by the Board of Recreation and Parks Commissioners in 2014, may not strictly apply to the Zoo, yet this document remains the clearest expression of community intent for LA’s greatest park. The Griffith Park Vision notes that priority should be given to the promotion of alternative modes of transportation, such as a shuttle system, to reduce vehicles in Griffith Park.
- The Griffith Park Vision focuses on the park’s urban wilderness identity, which the Draft EIR clearly indicates would be impacted as a result of the Zoo’s plans. These plans raise numerous concerns regarding displacement of existing park users, potentially severe habitat loss and impacts from nighttime events in an urban wilderness setting. We therefore recognize the tension between the Zoo’s Vision Plan and RAP’s Vision for Griffith Park, which will ultimately need to be reconciled by city policy-makers.

Conclusion

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the Zoo's Vision Plan. Again, we fully support the LA Zoo's goal of modernizing to become a world-class destination; at the same time, we believe additional measures are required to mitigate the project's *significant and unavoidable* transportation impacts. Given the Zoo's intent to add roughly 1.25 million annual visitors, these concerns are of great consequence. We look forward to further commitments from the project team that will enable us to support Alternative 2 or a revised project proposal.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jason Greenwald', with a large, stylized flourish at the end.

Jason Greenwald
Chair, Griffith Park Advisory Board

cc: Recreation and Parks Commissioners
Mike Shull, RAP
AP Diaz, RAP
Stefanie Smith, RAP
Ana Guerrero, Mayor's Office
Jessica Salans, Council District 4
Sarah Tanberg, Council District 4
Darryl Pon, LA Zoo
Erika Leachman, Wood