



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

September 20, 2022

Mr. Norman Mundy
Los Angeles Bureau of Engineering
Via email to: norman.mundy@lacity.org

Re: LA Zoo Vision Plan FREIR Comments

Dear Mr. Mundy,

For more than 18 months, this board has focused deeply on the Zoo's Vision Plan EIR and its impacts on Griffith Park. Early on, we decided to focus primarily on transportation issues, as they have the greatest impact beyond the Zoo's direct footprint. Our overarching goal is to enlist the Zoo, along with other City of LA departments and policy-makers, in furthering a vision of Griffith Park with fewer cars, more transit, and greater accessibility for all Angelenos.

Zoo officials have correctly pointed out that they cannot, on their own, be asked to solve the many issues related to transportation in and around Griffith Park. Yet by their own estimate, they intend to add 750,000 visitors per year, *nearly all of whom will arrive by private vehicle*. As such, the Zoo has an obligation to offer meaningful solutions and commitments beyond those contained in its Focused Recirculated Environmental Impact Report (FREIR).

The Zoo's latest proposal – known as Alternative 1.5 – includes a number of positive changes: The development footprint has shrunk, an aerial tram is no longer featured, and a parking structure is no longer being considered. These and other revisions are clearly in response to feedback received during the EIR process. Yet further changes are needed. Given our ongoing dialogue with the project team, we remain hopeful that Zoo officials will take this opportunity to better address the fundamental problem of adding too many cars, without sufficient transit commitments, to an already-stressed regional park at the edge of an urban wilderness area.

This board has previously shared concerns about habitat loss related to Zoo development and wildlife impacts from nighttime events. We wish to re-state these and other ecological concerns grounded in our mission to provide stewardship for Griffith Park's great urban wilderness – and directly tied to "[A Vision for Griffith Park](#)," approved by City of Los Angeles officials in 2014, which remains the clearest expression of community intent for our city's greatest park.

BOARD MEMBERS: Chair – Jason Greenwald; Vice Chair – Michelle Cramés; Secretary – Chris Laib; Aida Ashouri; Aaron Chung; Alex Crow; Gene Gilbert; Alex Phillips; Karen Thornton

Our detailed comments are laid out immediately following this letter, and seek to articulate the Zoo's obligation to better address transportation and ecological issues related to its renovation, and to make firm commitments to back its claims. In our view, any plan to add three-quarters of a million annual visitors must be backed by adequate mitigation. After a great deal of study, we find that Alternative 1.5 does not currently meet this standard.

Our primary critique of the transportation plan is that it is based on estimates rather than commitments, and that the analysis provided in Appendix P fails to support its conclusions. In fact, its central feature is an online reservation system designed to “maximize visitation and efficient use of the parking supply” (p. 306, FREIR). We are not convinced that such a program will lead to the reduction of hundreds of thousands of visitors each year, as claimed in the FREIR. We seek specific commitments and firm mandates to limit the increase in private vehicles while adequately supporting shuttles, buses and active transportation.

Other organizations have shared their analysis of ecological issues, which we wish to elevate – along with our primary focus on transportation – as City of Los Angeles officials consider the LA Zoo Vision Plan FREIR.

Therefore, as the Zoo completes the EIR process, we respectfully seek the following:

- Specific multi-modal commitments – beyond language already included in the Project's mitigation measure MM T-2 – for Parkline Shuttle, Metro buses & bike infrastructure.
- Significant Vehicle Miles Traveled (VMT) reductions, ideally 15 percent as [outlined in Alternative 2](#), or some reasonable compromise if policy-makers determine that is truly not possible.
- Maximum car capacity limits – with input from the LA Department of Transportation (DOT) – to support the Zoo's claims regarding the overall vehicle impacts under the Peak Visitation Management Program (PVMP); far greater specificity regarding commitments to be made under this program.
- Oversight from LA DOT in guiding and assessing both the Transportation Demand Management (TDM) program and the PVMP.
- Meaningful response to ecological concerns laid out in greater detail later in this document.
- Additional accountability measures to give this board and the public confidence that the Zoo is doing its part to contribute to alternate transportation and adequately mitigating the impact of hundreds of thousands of additional private-vehicle trips each year.

We approach transportation from the standpoint of equity, accessibility and sustainability. The City of Los Angeles aspires to greatness in each of these areas. Here in Griffith Park, big changes are underway: bicycle and pedestrian infrastructure; fewer lanes of vehicle travel; an emphasis on transit options for all Angelenos. We urge the Zoo to join our efforts, and we offer our partnership in finding solutions. With that said, our support of Alternative 1.5 will be possible only if Zoo officials revise their plans in line with the principles outlined in this letter.

Specific comments and questions may be found on the following pages.

Sincerely,

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

Jason Greenwald
Chair, Griffith Park Advisory Board

cc:

Hon. Nithya Raman and staff
Recreation and Parks Commissioners
RAP: Jimmy Kim, Matthew Rudnick, AP Diaz, Cathie Santo Domingo, Darryl Ford, Stefanie Smith
Mayor's Office: Ana Guerrero, Mary Hodge
City Administrative Officer Matt Szabo
Assembly District 43: Seamus Garrity
Zoo Commission President Karen Winnick
LA Zoo CEO Denise Verret
LA Zoo Director of Sustainability & Capital Programs Carol Armstrong
Wood Consulting: Erika Leachman

Alternative 1.5 does not sufficiently incentivize or require multi-modal transportation

The City of Los Angeles aspires toward the goals of fewer cars, more transit and enhanced active transportation, yet the Zoo's Alternative 1.5 sets no firm mandate for visitors arriving by means other than private vehicle – despite adding 750,000 visitors per year by completion.

While it is true that behavior change is challenging and transit involves multiple other agencies, those facts do not alleviate the Zoo's responsibility to commit to a viable transportation plan as part of its Vision Plan EIR. Our board previously [endorsed Alternative 2](#), which sets firm targets to reduce vehicular impacts for both employees and visitors, and which allows flexibility for the Zoo in reaching those targets. While Zoo officials have stated that Alternative 2 is not practical, they have not produced a plan that would sufficiently incentivize alternate means of transit.

We believe, as a fundamental matter, that any major development in or around Griffith Park must require multi-modal improvements with specific targets and firm mandates.

Among the first three “areas of known public controversy” [Section 1 - Page 3, FREIR] is improved multi-modal access. What, if anything, does Alternative 1.5 do to improve access beyond what is in the proposed Project?

Multi-modal access is stated as one of 14 project objectives [4-4], yet the Zoo has rejected the multi-modal Transportation Alternative (Alternative 2) as being infeasible. What specific commitments is the Zoo willing to make, beyond Mitigation Measure MM T-2, for multi-modal?

Does this FREIR consider any new projects in its cumulative project analysis? For example, the proposed Crystal Springs Drive & Griffith Park Drive Safety and Active Transportation Improvements Project, whose scope was presented publicly on May 24, 2022. [1-9]

The FREIR acknowledges that Alternative 1.5 is likely to continue the trend of “limited facilities and support for multi-modal transportation” and states that this situation “does not comport with adopted and emerging state, regional, and local policies and regulation to transform travel behavior, reduce VMT, and provide non-vehicular options for daily commuting and regional trips.” [4-156] We wish to restate our deep concern that approval of this EIR without sufficient multi-modal commitments is in direct conflict with City of Los Angeles policy goals.

Appendix P recommends extended hours of operation for the Zoo. What analysis has been made of additional rush-hour trips on traffic congestion in and around Griffith Park? [P-10]

Appendix P recommends discounts for rideshare visitation to the Zoo [P-10]. What analysis has been made of the additional transportation impacts of rideshare, particularly since a single visit would then require two car-trips per party, rather than one?

An overall increase in vehicles, particularly during evening events when there are currently few vehicles on park roadways, will likely lead to an increase in hazards to park goers, cyclists and pedestrians. Additionally, there will be an increase in potential for drunk-driving collisions. How have these risks been considered and evaluated?

Given that City of Los Angeles officials are prioritizing active transportation throughout the Griffith Park area, will the Zoo consider revising its roadway plans to augment active transportation infrastructure as part of its planned Crystal Springs rerouting?

Alternative 1.5 lacks firm Vehicle Miles Traveled (VMT) commitments

The primary means of addressing vehicular impacts for development projects is Vehicle Miles Traveled (VMT) – a statewide standard that can reduce private-vehicle use, while increasing other transportation such as buses, shuttles, bikes and pedestrians.

Alternative 1.5 claims a 16.7 percent VMT reduction compared to the proposed Project. Yet unlike Alternative 2, which mandates a 15-percent reduction, Alternative 1.5 merely estimates its visitor VMT total. Lacking a firm commitment, it cannot be relied upon for mitigation.

Page 4-6 makes plain the problem: “There would be no quantified reduction afforded in MM T-2 for visitor VMT ...” [4-6] We believe it is essential for the Zoo to commit to some quantified VMT reduction, even if it will not accept the 15 percent reduction under Alternative 2. Will the Zoo commit to a specific numeric reduction in visitor VMT as a good-faith effort to limit impacts from the large increase in vehicles?

Page 4-109: “Alternative 1.5 would *have the potential* to reduce visitor VMT by an estimated 16.7 percent less than projected VMT levels under the proposed Project” (emphasis added).

- Is the Zoo willing to commit to these figures?
- If not, what guarantees are offered to ensure that this reduction comes to fruition?

Table 4-13 on page 4-101 shows Phase 1 attendance of 1,910,771, as compared to a total of 2,218,025 for the proposed Project (Final EIR, 2-73). Basic arithmetic shows Alternative 1.5’s attendance being roughly 14 percent lower than the Project. Given that attendance figures appear to be driving the Zoo’s VMT reduction estimates, is the project team asserting that VMT will be 14 percent lower under Alternative 1.5 after Phase 1? Will the Zoo commit to this reduction – for visitors and/or VMTs? If not, what guarantees are offered for either?

“[D]aily visitor VMT on weekends (the highest attendance days) in 2038 is anticipated to be reduced from 136,527 under the proposed Project to approximately 113,527 under Alternative 1.5 ...” [4-143]

- Please provide the underlying analysis/modeling/data used to arrive at these figures as our own analysis finds there are some problematic errors in assumptions/calculations.

The showcase transportation program – PVMP – cannot be relied upon to reduce attendance; in fact, its stated objective makes this goal contradictory

The FREIR's introduction states that attendance estimates – and, therefore, vehicle impacts – will be far lower under Alternative 1.5 than under the proposed Project. Yet these figures are illusory. To say that attendance will be 2.5 million per year rather than 3 million is a bold statement requiring deep analysis. Yet Appendix P provides no such analysis for review.

Of particular concern, the primary means to arrive at the new target is an online reservation system, the Peak Visitation Management Program (PVMP), whose stated objective is to “maximize visitation and efficient use of the parking supply” [P-10]. Logically, how can a program to increase visitors be relied upon to reduce visitors by such large numbers?

The explanation given by the project team is that the existing parking supply will serve as a check on visitation and, therefore, vehicles. Yet that supply is the same as the Project in Phases 1 – 6 – in other words, for nearly the entire lifespan of the Vision Plan. How, then, can this program achieve its objectives?

Given these questions, please provide modeling, data and methods used to reach Appendix P conclusions – as offered by the project team – so we can better analyze PVMP's impacts.

“This program would also optimize visitation during non-peak conditions to support the Zoo's goals for annual visitation through Vision Plan implementation ... [including] techniques that could be employed to shift visitor demand away from peak periods to times when the Zoo's parking lot would have capacity.” [4-100]

- If visitor demand is elastic and PVMP is effective, how can this possibly lead to a decrease in attendance relative to the Project, particularly in the short term?
- If the Zoo has become more efficient during Covid at shifting demand to avoid parking issues, and they have several new large event spaces, and the parking constraints are the same (2,444 spaces in both Project and Alternative 1.5 through Phase 6), how is it possible that visitation growth would be anything but the same or higher under Alt. 1.5?

If the parking demand model shows that demand will exceed capacity on days when attendance is 12,600 or higher, does that mean the Zoo will commit to 12,600 visitors as a daily maximum as part of this FREIR approval? [0-9]

- If not, and if the Zoo succeeds in shifting demand through PVMP, then how does this program achieve the promised VMT reduction of 16.7 percent?

The FREIR states, “Zoo parking demand is expected to exceed supply for at least a portion of one hour on 15 days in 2025, 25 days in 2027, 42 days in 2030, and 53 days in 2040.” [O-9 – 10] Please quantify the number of visitors who would be turned away as a result of PVMP for each of those four points in time, so that we can better understand how this limited number of peak days accounts for projected reductions of hundreds of thousands of visitors per year.

Would the online reservation system be in place on all days, or only during peak times? [0-10]

Three large event spaces may add significant numbers of visitors – more than the FREIR states

The Zoo entry garden and park is now being prominently featured in this FREIR and seemingly folded into the phasing of Alternate 1.5:

“This alternative would develop a publicly accessible entry garden and park space near the Zoo entrance as part of the Project, effectively incorporating the Angela Collier Gardens project described under Section 3.18 Cumulative Projects with slight modification.” [4-8]

However, the Angela Collier Garden and Event Space was only mentioned in last year’s Final EIR in passing as an already approved project. The only details we could find were that the Angela Collier Gardens (as articulated in GLAZA Zoo View – Winter 2018) were expected to have “two event spaces, one stage, a covered patio, and an amenities building that can serve as a meeting space, a staging area, or a bride’s room.” This illustrates the overarching issue of lack of details and granularity regarding both this and other event spaces.

While the proposed Zoo entry space is defined as a 1.87-acre “gathering space” with 60,000 square feet of “new visitor-services space” [4-98], numerous unanswered questions remain:

- Please detail specifics (including any schematics, figures, descriptions) of how this roughly 2 acres of planning area has changed from the little mention in the Final EIR.
- Exactly how much of this space can be used for events and at what capacity?
- How much of an increase in visitation is the Zoo attributing to this new space? Have these assumptions been factored into Alternative 1.5?
- Will limits be set on the frequency of private events so this park can be enjoyed by regular Zoo patrons and the public?

LA Zoo Lights helped achieve an increase in attendance by more than 200,000 people per year. The FREIR notes: “Expansion of facilities and spaces that can accommodate new events, more frequent events, or larger events would contribute to increases in annual attendance.” [4-43] Compared to the original Project, Alternative 1.5 has the same amount of event space during early phases and only slightly less event space by completion (though the FREIR notes the loss of Safari being accommodated by the Zoo Entry Space).

If most events are not constrained by PVMP, because they happen at non-peak times or evenings, would that impact the projected growth calculations that decrement Alternative 1.5 below the proposed Project?

Do the VMT calculations include visitors for special events or solely for regular Zoo attendees? What would the VMT calculations look like if including all proposed special events, utilizing all event spaces at capacity, annually?

The total proposed Project (Final EIR 2-36) visitor space square footage breakdown was 31,800 for Africa; 24,000 for Treetops; and 18,000 for California. Please elaborate on details and capacity on all available event spaces including, but not limited to, the three main visitor centers (Africa, Treetops, California) as well as the Zoo Entry. Furthermore, exactly how much event space was lost with the removal of Safari Picnic in the Africa area?

Alternative 1.5 does not sufficiently address critical ecological concerns

While our board has focused primarily on transportation during our 18 months of review, we have heard from many Griffith Park stakeholders about their concerns regarding the ecological impacts of the Vision Plan EIR. We therefore wish to elevate those concerns, which in many cases are based on far deeper analysis than our own ecological review. Yet we wish to place these concerns in the context of Griffith Park's role in our city, and its mandate.

For more than 100 years, Griffith Park has been viewed as an oasis from the surrounding city and, in fact, its donation by Col. Griffith specifically stated this goal. Much more recently, a visioning process known as "[A Vision for Griffith Park](#)" underscored the park's urban wilderness identity, and the community's desire that it remain, first and foremost, a place where the existing plant and animal life could live in concert with the many people who enjoy the park.

While the Zoo is administratively separate from the Recreation and Parks Department, the wild lands of Griffith Park know no such boundaries. Park visitors and residents of surrounding neighborhoods are also affected; so too is wildlife throughout the park. Please review and respond to ecological analysis made by other organizations including, without limitation, the Community Forest Advisory Committee; Friends of Griffith Park; Los Angeles Audubon Society; and Los Feliz Neighborhood Council.

Please consult with the City of Los Angeles Urban Ecologist, whose portfolio at the Recreation and Parks Department includes a primary focus on Griffith Park, in assessing the following impacts and appropriate mitigation strategies for each:

- Potential impacts of the proposed Condor Canyon development on wildlife movement within Griffith Park, in particular whether this area may be a wildlife corridor or migration route.

- Surveys of sensitive/special species within both the Zoo's proposed development area and the rest of Griffith Park, in order to more properly assess strategies to preserve and protect these species prior to development plans being approved.
- Nighttime event impacts on the wider park area, with a particular focus on both light and sound, given the known impacts on a range of species including birds, large and small mammals, and reptiles.
- Wildlife movement across Zoo Drive and surrounding roadways, in particular impacts and mitigation related to the large potential increase in nighttime vehicles on these roadways as a result of both expanded Zoo hours and a large increase in events.
- Biodiversity in Griffith Park as a result of any and all of the above impacts.

Please explain the disparity between language on the Zoo's website, in the Vision Plan EIR FAQ section, which states, "The Zoo does not plan to blast land in the Zoo or Griffith Park," and the FREIR, in NOI-2, 4-137, which states, "Alternative 1.5 would implement similar construction and blasting activities as the proposed Project."

The FREIR requires clarification and, in some cases, correction of factual errors

In numerous instances, the FREIR is unclear about specific points, and/or makes factual errors that undercut its analysis. We respectfully ask that these clarifications and corrections be made, and any resulting conclusions be adjusted. Only then can we and others make a fully informed analysis of Alternative 1.5.

Given that the FREIR findings for Alternative 1.5 are based on a maximum of 2.5 million visitors per year, would the Zoo be willing to commit to that figure (and all projected growth figures for all Phases along the way) as a limit beyond which any further development would require additional transportation study and subsequent approval by the City Council? [1-10]

1-13: How does Alternative 1.5 achieve more Project objectives than Alternative 2 given that Alternative 2 achieves all stated Project objectives? (See also 4-9, 4-20, 4-205 and 4-207.) Please correct all such references, as appropriate.

4-195: Section T-2 contains a factual error regarding Alternative 2's reductions. Although its requirement does in fact represent a "5 percent greater" reduction for employee VMT's (vs. 10 percent baseline in Project), it is actually "15 percent greater" for visitors (vs. no specific numeric reduction in Project). Please correct.

Please confirm that the figure of 2,500 surface parking spaces [4-96] is accurate, as it appears to represent an increase from the previously stated total of 2,444 [4-99], and which was based on 2,144 existing spaces and 300 spaces added as part of Phase 1.

Regarding the 56 new employee spaces in phase 3 and the 92 repainted spaces at Gottlieb/Condor West in phase 4 [4-46], while both exist in the proposed Project, please clarify:

- How do these factors specifically impact visitor parking, as all of the estimates for PVMP in Appendix P appear to be based on the assumption that visitors have complete access to all 2,444 spaces? [Appendix P, attachment A]
- Are visitors competing with employees on peak days until phases 3 and 4?

The FREIR states Alternative 1 attendance would max out at 2,525,775 persons; however, this number conflicts with the figures from the Final EIR, which maxed at 2,646,984 – why the difference? Was a new study conducted or were the figures revised for some reason? [1-10]

Alternative 1.5 is declared the Environmentally Superior Alternative (ESA) because it purportedly has the lowest growth figures, a point that was repeated at the Zoo's public meeting on August 15th. However, if the Zoo is able to hit higher attendance figures than outlined in the growth tables or if PVMP doesn't mitigate attendance to the extent anticipated, wouldn't that change its ESA designation? [1-13]

- If Alternative 1.5 generates attendance over the projected 1.9 million in phase 1, thus undermining its ESA status, what actions will the Zoo take to rectify this assessment?

Alternative 1.5, at 2.5 million visitors per year, generates "adequate visitation to support the economic viability of the Vision Plan, as analyzed by the 2017 AECOM economic feasibility study, which informed the Vision Plan (Appendix A)." [4-154] Yet the FREIR states that Alternative 1 (at 2.5 - 2.6 million visitors) "would likely not generate as much revenue as the proposed Project and could undermine the economic viability of the Vision Plan." [4-92]

- Does that mean anything less than 2.5 million visitors would be insufficient?
- What explains the disparity in considering these two Alternatives' economic viability where in one case 2.5 million is sufficient but in the other it will undermine viability?
- If 2.5 million visitors is the razor's edge of economic viability, what incentives does the Zoo have to limit visitation (and related VMTs) to 2.5 million, as opposed to a greater figure if it is able to shift demand or find additional growth without PVMP constraints?

The Zoo uses the term "accessibility" frequently in its explanation of its plans, and states that Alternative 1.5 would increase accessibility. For whom would the Zoo be more accessible with Alternative 1.5?

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