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*Making Conservation  
a California Way of Life*

August 29, 2022

Governor's Office of Planning & Research

**Aug 29 2022**

**STATE CLEARINGHOUSE**

Norman Munday, Environmental Supervisor II  
Los Angeles Bureau of Engineering  
Environmental Management Group  
1149 S. Broadway, Suite 600, Mail Stop 939  
Los Angeles, CA 90015

RE: LA Zoo Vision Plan  
SCH # 2019011053  
Vic. LA-5/PM 26.565  
GTS # LA-2019-04006-RDEIR

Dear Norman Munday:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced environmental document. Following publication of the Final EIR in June 2021, the City continued to receive comments regarding the proposed Project's impacts related to biological resources, transportation, and aesthetics. In response to these comments, a new project alternative, Alternative 1.5, the California Focused Conservation Alternative, was created and has been analyzed in this Focused Recirculated EIR in accordance with CEQA Guidelines Section 15088.5. The alternatives and transportation sections are summarized in the followings.

**Alternative 1-Reduced Project Alternative**

The existing undeveloped hillsides in the California and Africa planning areas currently support sensitive biological resources, including native vegetation communities, habitat for several designated sensitive species, several occurrences of the federally and state-listed endangered Nevin's barberry, and hundreds of locally protected trees. To reduce impacts on these resources, the Reduced Project Alternative would redesign the Vision Plan's land use plan to avoid development of the Zoo's existing undeveloped hillside areas where these resources are present. In addition, the Reduced Project Alternative would protect views from public roadways such as Zoo Drive and Western Heritage Way by retaining surface parking in the northern parking lot and excluding or substantially reducing the size of a multi-story parking structure. Alternative 1 would reduce or avoid impacts compared to the Project but would fail to meet or would only partially meet several of the Project objectives.

### ***Transportation***

With the implementation of a comprehensive TDM Program (**MM T-2**), Alternative 1 would align with the VMT reduction goals and objectives within the SCAG's 2016 RTP/SCS, Los Angeles General Plan, Mobility Plan 2035, Hollywood Community Plan, Griffith Park Vision Plan, Green New Deal Plan, and Plan for a Healthy Los Angeles. As described for the proposed Project, Alternative 1 would be consistent with the plans listed above to a greater extent than the proposed Project due to overall reduced VMTs, but would be similar to the Project in terms of multi-modal local and regional transportation policies. Alternative 1 would not cause significant environmental impacts due to conflicts with any transportation plan, policy, or regulation, and impacts would be similar to the Project and less than significant with mitigation.

Alternative 1 construction activities would result in additional VMT in the Project vicinity and on the I-5 and SR-134 freeways, associated with construction materials deliveries, soil import and export, export of demolition debris, and construction worker trips. Construction-related increases in VMT would occur intermittently and would be lower in volume than the construction vehicle trips and VMT associated with the proposed Project. The Construction Traffic & Access Management Plan required under **MM T-1** would further reduce construction VMT impacts through provisional measures to reduce construction traffic and associated VMT.

As described in Section 3.15, *Transportation*, the Zoo is currently isolated from major and local transit hubs, with only two transit lines (i.e., Parkline Shuttle and Metro Line 96) currently serving the Project site. Like the proposed Project, Alternative 1 would include several TDM measures associated with the expansion of transit services to serve the Project site and encourage the use of transit and active transportation modes by visitors and employees under **MM T-2**. For example, the TDM Program may include providing incentives for carpooling/vanpooling for Zoo employees, discounting entrance fees for visitors who can provide proof of arrival via transit; and showers, racks, and lockers for Zoo employees.

Alternative 1 would result in a smaller increase in daily VMT when compared to the proposed Project due to the reduction in annual visitation and employment compared to the Project. As such, daily visitor VMT on weekends (the highest attendance days) in 2040 would be reduced by an estimated 15.8 percent, from 139,287 under the proposed Project to approximately 117,280 under Alternative 1, prior to mitigation. Consequently, daily employee VMT on Mondays and Fridays in 2040 would be reduced from 24,436 under the proposed Project to approximately 19,231 under Alternative 1 prior to mitigation. Additionally, Alternative 1 would implement **MM T-2** similar to the proposed Project to meet an overall goal of reducing projected Zoo employee VMT by 10 percent and Zoo visitor VMT to the extent feasible. While the reduced visitation and implementation of **MM T-2** under Alternative 1 would result in a reduction in operational visitor and employee VMT when compared to the proposed Project, this alternative's VMT

estimates would still exceed the TAG's established net-zero VMT threshold for event centers and regional-serving entertainment venues. Therefore, Alternative 1, similar to the Project, would have *significant and unavoidable* impacts related to increased VMT.

### **Alternative 1.5 – California Focused Conservation Alternative**

Under Alternative 1.5, the California Focused Conservation Alternative, 6 acres of undeveloped hillsides in the Africa planning area would remain as undeveloped native habitat and would be managed as a restoration and ecological education area of the Zoo. Within these 6 acres, approximately 5 acres support sensitive native coast live oak woodland habitat, 20 Southern California black walnuts, 113 coast live oaks, 15 toyon, and 21 elderberry shrubs, which are City protected trees. Alternative 1.5 would reduce impacts on these resources by redesigning the proposed Vision Plan land use plan to avoid this area. To support biodiversity conservation within the Zoo, this area would be the focus of concerted native habitat restoration and any public access would be related to the restoration of the area and/or education about the restoration of the area. Some visitor serving uses (e.g., safari picnic area) envisioned under the proposed Project in the Africa planning area would be eliminated to protect undeveloped native vegetation. Instead, similar visitor-serving uses would be provided at the Zoo Entry Garden and Park proposed within an underutilized, disturbed area adjacent to the Zoo Entry in Phase 1 of the Vision Plan. As with the proposed Project, animal welfare would continue to be substantially improved under this alternative, with space devoted to Zoo animals increasing from 20.8 acres to 54.5 acres, a 162.1% increase. Alternative 1.5 would also preserve views from public roadways inside Griffith Park, such as Zoo Drive and Western Heritage Way, by eliminating the multi-story parking structure proposed in the northern Zoo parking lot under the Project. Alternative 1.5 would substantially reduce annual Zoo visitation due to the implementation of the Peak Visitation Management Program. To manage visitation within the capacity of the Zoo's surface parking lots, the Peak Visitation Management Program would control daily visitation on high-demand days and manage parking supply, which would decrease VMT, energy demand, and air pollutant and GHG emissions compared to the Project. All development would be designed according to proposed development design guidelines that would ensure the use of California native vegetation and stormwater best management practices. Under this alternative, the Vision Plan is estimated to be implemented over 18 years, which is 2 years less than the proposed Project. Alternative 1.5 would reduce or avoid impacts compared to the Project, such as those to biological and visual resources, and would meet all of the Project objectives.

### ***Transportation***

With the implementation of a comprehensive TDM Program (**MM T-2**), Alternative 1.5 would align with the VMT reduction goals and objectives within the SCAG's 2016 RTP/SCS, Los Angeles General Plan, Mobility Plan 2035, Hollywood Community Plan, Griffith Park Vision Plan, Green New Deal Plan, and Plan for a Healthy Los Angeles. In addition, implementation of the PVMP would substantially reduce visitation and associated increases in VMT, consistent with the objectives of the above-referenced

plans. Alternative 1.5 would be consistent with the plans listed above to a greater extent than the proposed Project due to an overall substantial reduction in VMT but would be similar to the proposed Project in terms of multi-modal local and regional transportation policies. Alternative 1.5 would not cause significant environmental impacts due to conflicts with any transportation plan, policy, or regulation, and impacts would be similar to the proposed Project and *less than significant with mitigation*.

The analysis within this EIR of Alternative 1.5 would be consistent with the requirements of CEQA Guidelines section 15064.3, which requires using VMT as a measure for transportation impacts based on the City's adopted TAG thresholds for increases in VMT for regional uses.

Under Alternative 1.5, construction activities would result in additional VMT in the Project vicinity and on the I-5 and SR-134 freeways, associated with construction materials deliveries, soil import and export, export of demolition debris, and construction workers trips. Construction-related increases in VMT would occur intermittently and would be lower in volume than the construction vehicle trips and VMT associated with the proposed Project. The Construction Traffic & Access Management Plan required under **MM T-1** would further reduce construction VMT impacts through provisional measures to reduce construction traffic and associated VMT.

As described in Section 3.15, *Transportation*, the Zoo is currently isolated from regional and local transit hubs, with only two transit lines (i.e., the new Parkline Shuttle and Metro Line 96) currently serving the Project site. Similar to the proposed Project, Alternative 1.5 would include TDM measures to expand transit service to serve the Project site and encourage the use of transit and active transportation modes by visitors and employees. However, Alternative 1.5 would substantially reduce daily VMT when compared to the proposed Project due to the elimination of the parking structure and implementation of the PVMP, which would cap the number of visitors/reservations at the Zoo during peak times. As a result, Alternative 1.5 is estimated to result in an approximately 16.7 percent reduction in total annual Zoo visitation, for a total of 2,500,000 visitors per year, and an approximately 21.8 percent reduction in total Zoo employees, or a total of 861 employees, by buildout in 2038. Based on these percent reductions in visitation and employment, daily visitor VMT on weekends (the highest attendance days) in 2038 is anticipated to be reduced from 136,287 under the proposed Project to approximately 113,527 under Alternative 1.5, prior to mitigation. Daily employee VMT on Mondays and Fridays in 2038 would also be reduced from 24,436 under the proposed Project to 19,109 under Alternative 1.5, prior to mitigation. While the reduced visitation and implementation of **MM T-2** under Alternative 1.5 would result in a reduction in operational visitor and employee VMT when compared to the proposed Project, this alternative's VMT estimates would still exceed the TAG's established net-zero VMT threshold for event centers and regional-serving entertainment venues. Therefore, Alternative 1.5, similar to the proposed Project, would have *significant and unavoidable* impacts related to increased VMT.

## **Alternative 2 – Multi-modal Transportation Alternative**

Under the Multi-modal Transportation Alternative, the Zoo would implement measures that would go beyond the state and regional goals and policies for reducing VMT and increasing multi-modal transportation. Alternative 2 would incorporate Project mitigation measures and additional measures for reducing VMT into the design of the Project. This would involve additional measures to increase active transportation and transit to and from the Zoo by coordinating with local and responsible agencies, providing funding for key improvements, and incentivizing alternative modes of travel. Alternative 2 would result in a greater level of consistency with state and regional goals for reducing VMT and associated vehicle GHG emissions, slightly reducing impacts compared to the Project; however, due to the City's adopted thresholds for regional serving retail projects, impacts would remain significant and unavoidable. Nevertheless, Alternative 2 would achieve all of the Project objectives.

### ***Transportation***

Alternative 2 would include a comprehensive TDM program that expands multi-modal transportation to the Zoo and would align with the VMT reduction goals and objectives within the SCAG's 2016 RTP/SCS, Los Angeles General Plan, Mobility Plan 2035, Hollywood Community Plan, Griffith Park Vision Plan, Green New Deal Plan, and Plan for a Healthy Los Angeles. As described for the proposed Project, Alternative 2 would be consistent with the plans listed above to a greater extent than the proposed Project due to overall reduced VMTs, and multi-modal local and regional transportation policies. Alternative 2 would not cause significant environmental impacts due to conflicts with any transportation plan, policy, or regulation, and impacts would be similar to the Project and less than significant with mitigation.

Alternative 2 construction activities would result in additional VMT in the Project vicinity and on the I-5 and SR-134 freeways, associated with construction materials deliveries, soil import and export, export of demolition debris, and construction worker trips. Construction-related increases in VMT would occur intermittently and would be lower in volume than the construction vehicle trips and VMT associated with the proposed Project. The Construction Traffic & Access Management Plan required under **MM T-1** would further reduce construction VMT impacts through provisional measures to reduce construction traffic and associated VMT.

As described in Section 3.15, *Transportation*, the Zoo is currently isolated from major and local transit hubs, with only two transit lines (i.e., Parkline Shuttle and Metro Line 96) currently serving the Project site. Alternative 2 would include comprehensive TDM measures associated with the expansion of transit services to serve the Project site and encourage the use of transit by visitors and employees. While Alternative 2 implementation would increase daily VMT over existing conditions due to the addition of new employees and an increase of approximately 1.2 million new annual visitors,

Alternative 2 would meet an overall goal of reducing projected Zoo VMT by 15 percent (5 percent greater than **MM T-2** under the proposed Project). As such, daily visitor VMT on weekends (the highest attendance days) in 2040 would be reduced from 136,287 under the proposed Project to approximately 115,844 under Alternative 2. Daily employee VMT on Mondays and Fridays in 2040 would be reduced from 24,436 under the proposed Project to 20,771 under Alternative 2. While Alternative 2 would result in a significant reduction in operational visitor and employee VMT when compared to the proposed Project without additional mitigation, this alternative's VMT estimates would still exceed the TAG's established net-zero VMT threshold for event centers and regional-serving entertainment venues. Therefore, Alternative 2, similar to the Project, would have *significant and unavoidable* impacts related to increased VMT.

### **Other Comments**

Please reference to Caltrans comment letter dated February 16, 2021 as an additional comment for the City's consideration. We recommend the City choose the less impact alternative as the City sees fit.

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of stormwater run-off is not permitted onto State highway facilities without any stormwater management plan.

As a reminder, any transportation of heavy construction equipment and/or materials that requires the use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend that large-size truck trips be limited to off-peak commute periods.

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2019-04006-RDEIR.

Sincerely,



MIYA EDMONSON  
LDR/CEQA Branch Chief

email: State Clearinghouse