

SANTA MONICA MOUNTAINS CONSERVANCY

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October 17, 2022

Norman Mundy
Los Angeles Bureau of Engineering
1149 S. Broadway, Suite 600, Mail Stop 939
Los Angeles, California 90015



**Comments on Los Angeles Zoo Expansion Project (LA ZOO VISION PLAN) and
Focused Recirculated EIR CF 21-0828 (SCH 2019011053)**

Dear Mr. Mundy:

The Santa Monica Mountains Zone is an environmental resource of critical concern. The Los Angeles Zoo and the greater Griffith Park ecosystem are both fundamental elements of this regional resource. The Zoo's natural habitat, which includes the ridgeline proposed to be destroyed both by Condor Canyon and a large visitor center, contributes to the long-term function and sustainability of this unfortunately ever shrinking natural resource.

The Conservancy opposes any project that severs that ridgeline and locates any facilities on that ridgeline other than a 1500-square-foot shade structure pavilion with no services except water fountains, outdoor educational displays, and a funicular to reach the ridgeline. Not only does the ridgeline contain high quality chaparral with a sensitive plant species, but it further provides a unique view of the confluence of the Los Angeles River, Verdugo Wash, Verdugo Mountains, Santa Monica Mountains, and San Fernando Valley with a backdrop of the San Gabriel Mountains and distant Santa Ana Mountains. The views back towards Griffith Park are also unique to build public appreciation for natural systems. From this location one can see how the vast City infrastructure touches and separates these eroding natural areas.

The ridgeline is an irreplaceable place to educate the public about the City's natural resources, landforms, and hydrology. The land should dictate the use, and this land dictates it being a place to reflect and study the regional landscape without unnatural distractions. The view and ambience are not replicable as an educational resource anywhere else in the City. These site-specific educational values far overshadow the

public entertainment value (or any educational values) of a climbing wall in Condor Canyon.

Condor Canyon sends the wrong message in a multitude of ways. The destruction of this ridgeline with a 15,000-square-foot, multi-story visitor center and 36,000 cubic yards of earth export alone represent unmitigable significant biological and aesthetic impacts. Most importantly these are impacts that can be avoided without changing any other aspects of the proposed new Alternative 1.5.

The Conservancy urges the modification of Alternative 1.5 to eliminate the Condor Canyon element and grading and to only place a maximum 1,500-square-foot shade structure pavilion with no services except water fountains, outdoor educational displays, and a funicular to reach the ridgeline. Any more infrastructure than this recommended modification ruins the unique characteristics of the view site and the high-quality chaparral that gives it its natural ambience.

The Recirculated EIR touts the value and importance of new visitor circulation provided by the Condor Canyon ridgeline cut. However, to date, it does not appear that the record includes any consideration of a tunnel through the ridgeline to provide that circulation. Such a tunnel or set of tunnels (one for pedestrians and one for electric maintenance vehicles) would avoid the need to essentially eliminate this significant ridgeline.

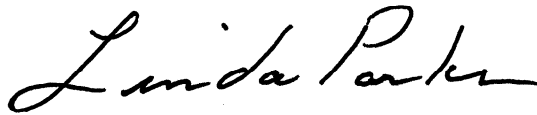
Because such a low acreage percentage of the proposed California Planning Area (that includes proposed Condor Canyon) would specifically benefit Zoo animals, the Conservancy's recommended design changes will better benefit Zoo animals, native animals, and the Zoo's condors in captivity. In its current state, that ridgeline buffers the condor area from a multitude of human impacts. It makes little sense to blast out Condor Canyon to create extensive ridgeline facilities that are harmful to the quiet environment of the condor breeding area. The proposed ridgetop visitor center would stick out like a sore thumb visible from every mountain range and river in the city. Clearly that visitor center would have extensive indoor and outdoor lighting. We urge that the unique public teaching values of the subject ridgeline be not squandered to construct a commercial facility that may have teaching values that are easily taught elsewhere within the Zoo property.

Until both Condor Canyon and the ridge top visitor center are eliminated, only the original Alternative 1 can be deemed the Environmentally Superior Alternative.

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Please send any correspondence to Paul Edelman, Deputy Director for Natural Resources and Planning at the above letterhead address or by email at edelman@smmc.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Linda Parks". The signature is written in a cursive, flowing style.

LINDA PARKS
Chairperson