b. **Motion**: The Board of the Studio City Neighborhood Council Opposes <u>Council File 21-0828</u> Los Angeles Zoo Vision Plan / Environmental Impact Report / Infrastructure and Animal Facility Improvements - unless amended.

The Studio City Neighborhood Council supports the mission of the zoo, which is to lead the way in saving wildlife and connecting Angelenos to the natural world by providing exemplary animal care, delivering distinctive and diverse learning opportunities, and creating unforgettable experiences. However, some of the changes proposed in <u>Alternative 1.5</u>, such as elimination of habitat for sensitive native species (see the <u>California Department of Fish and Wildlife's 2021 letter</u>) and commercialization of a ridgeline, would not further the zoo's mission as much as other less disruptive options that would do more to support Griffith Park's existing ecosystem and biodiversity while allowing us to enjoy it. We could support an alternative that prioritized only the amount of development absolutely necessary for improving existing animal exhibits, animal care, and for visitor accessibility and safety. We are concerned that the environmental costs of some of the proposed changes would outweigh any benefits and would not necessarily enhance people's experience of nature.

The Los Angeles Zoo Vision Plan plans to develop 16.5 acres of undeveloped mature California woodland and chaparral in the eastern portion of Griffith Park, which is home to a number of threatened and rare species and provides habitat for a wide range of native vegetation and wildlife, including mountain lion. The protection of the 16.5 acres of wildland would help meet Governor Newsom's vital 30x30 goals and complement the City's biodiversity protection and wildlife habitat connectivity initiatives.

Mature woodlands and chaparral serve to sequester carbon – a function that is critical to our survival. The California Global Warming Solutions Act (AB 32) defined thresholds to reduce carbon dioxide emissions by 2020 to 1990 levels, with a further 80 percent CO2 reduction by 2050. That means every ton of CO2 emitted back into the atmosphere by removal or conversion of older woodlands and chaparral, a measurable adverse environmental effect.

The proposed Visitor's Center would be visibly prominent on the hilltop, with nighttime events creating light and noise that would negatively impact Griffith Park wildlife. The Los Angeles Audubon Society finds that it is not appropriate to blast a canyon through a ridgeline in the Santa Monica Mountains for a condor display in the name of conservation, particularly when the captive breeding of Condors in the back-of-the-house areas at the L.A. Zoo has been successful for over 30-years.

The California Department of Fish and Wildlife (CDFW), has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). For purposes of CEQA, CDFW is charged by law to provide biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources.

The CDFW findings are as follows:

- adverse impacts of the California Area expansion in the Zoo Alternative 1.5 will be significant.
- removing the coast live oak plant community in the project area may increase sediment, debris, and pollutant input into streams; and
- the Project would result in erosion and pollutants that could affect the quality of the Los Angeles River, streams in the canyons and open space surrounding the L.A. Zoo, and will likely adversely impact an ephemeral drainage located at the bottom of the existing canyon.
- the Project may result in loss of riparian habitat.
- it is unlikely that there is ample land available to mitigate the loss of area affected at the proper mitigation rate of 5:1 by area affected under CEQA protocols and 4:1 tree replacement under the City's Protected Tree Ordinance.

In the end, the Zoo has failed to adequately respond to many deficiencies in the Focused Environmental Impact Report (FEIR), including deficiencies found by CDFW, and now proposes to move forward by requesting comments be limited to the chapters included in the current focused FREIR.

The survival and well-being of the City's residents depends directly on ecosystem services, including oxygen generation, water purification, topsoil creation, biodegradation, waste removal, and carbon sequestration. These and many other services derive from an integrated community of natural biodiversity. Biodiverse landscapes on Zoo property currently provide benefits to residents that we cannot afford to lose.