



October 23, 2020

Sent via email

Mayor Eric Garcetti
City Hall
200 N. Spring Street
Los Angeles, California 90012
mayor.helpdesk@lacity.org

Re: Opposition to the Proposed Griffith Park Aerial Tram

Dear Mayor Garcetti,

On behalf of the Center for Biological Diversity, we are writing to express our strong opposition to the proposed Griffith Park Aerial Tram Project (“Project”). The Project would result in loss of habitat, species, wildlife connectivity, and native biodiversity that could lead to a downward spiral of ecological degradation in the City’s last remaining natural open space. In addition, the project would likely increase traffic in an area already plagued with congestion. The Project contradicts your commitment to both the [Green New Deal](#) and the [Vision for Griffith Park](#), both of which push for a more sustainable city that protects the environment, reduces greenhouse gas emissions, and provides equal access for all communities to open space.

Background on the Center

The Center for Biological Diversity (“Center”) is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 1.7 million members and online activists throughout California and the United States. The Center and its members have worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in Los Angeles.

The Project would have insurmountable impacts on struggling local mountain lions and other native animals and plants.

As you may know, local mountain lions are at risk of extinction as their genetic health deteriorates due to inbreeding caused by roads and development slicing through their habitat and isolating populations (Ernest et al. 2014; Riley et al. 2014; Vickers et al. 2015; Gustafson et al. 2018; Benson et al. 2019). Low genetic diversity combined with high human-caused mortalities (e.g., from car strikes, depredation kills, rodenticide poisoning, and poaching) threaten the long-term survival of several populations. Mountain lions in the Santa Monica Mountains are especially imperiled, as [abnormalities linked with inbreeding depression was recently observed](#).

Should inbreeding depression occur, scientists predict there is a >99% chance of extinction, which could occur within as little as 15 years (Benson et al. 2019).

Given the perilous situation of local mountain lions, the California Fish and Game Commission voted on April 16, 2020 to grant Southern California and Central Coast mountain lions candidate species status under the California Endangered Species Act. The unanimous vote came after nearly [one hundred organizations](#) signed a letter supporting the vote, thousands of community members wrote to the commission, and the editorial board of the *Los Angeles Times* [wrote in favor](#) of the listing, as did former State Senator and chair of the Senate Natural Resources and Water Committee, [Fran Pavley](#). City Councilmembers Paul Koretz, David Ryu, and Bob Blumenfield also introduced a resolution supporting the listing of mountain lions and acknowledging that “functioning and healthy ecosystems are essential to the continued health and well-being of Angelenos and human beings around the world.”

Griffith Park is in the eastern portion of the Santa Monica Mountains and home to P-22, Hollywood’s beloved mountain lion that has captured the hearts and imaginations of many Angelenos, young and old. Despite being surrounded by freeways and urbanization and having the smallest home range ever documented for these big cats, P-22 is thriving within the Park. This speaks to the high quality habitat of the Park’s rugged wildlands, its importance to the area’s rich biodiversity, and the need to connect the Park with nearby open space. The Project would fragment and degrade the habitat within the Park and reinforce existing barriers around the Park with increased traffic, which would result in severe long-standing and degenerative impacts on P-22 and the Santa Monica puma population as well as numerous other native wildlife and plants within the park.

Griffith Park has been designated a [Significant Ecological Area](#), which means it has been recognized as an area within LA County with “irreplaceable biological resources.” It is important for habitat connectivity and wildlife movement between the Santa Monica, Verdugo, and San Gabriel mountains, and it is teeming with biodiversity. Despite being within one of the most urbanized areas in the world, [over 400 verifiable species](#) of animals and plants have been documented in the Park via iNaturalist while at least 39 native butterfly species (Bonebrake and Cooper 2014) and numerous rare native plants (Cooper 2010) have been observed in the Park. Some animals and plants within the Park no longer occur in most of the LA Basin (Cooper and Mathewson 2009). Installing more human-made infrastructure could cause significant harms to the Park’s unique biodiversity and flourishing ecosystems.

The Project would increase traffic and greenhouse gas emissions while making the Park less accessible to those for whom the Park was intended.

The Griffith Park Advisory Board’s comment letter on October 2, 2020 brings attention to the fact that the Stantec/Consensus project team acknowledged that the proposed tram would not meaningfully reduce traffic inside Griffith Park and would only potentially serve as a partial solution to the traffic outside the Park. The Center is concerned that such a tourist attraction and recreational ride would actually increase traffic in the area and lead to more congestion, increased air pollution, and increased greenhouse gas emissions. And because the tram operators would be collecting fees to ride the tram, it would further distance low-income and minority

communities that have historically been excluded from urban green space and go against [Colonel Griffith's mandate](#) that the park be available to people of “modest means.”

The removal and degradation of Griffith Park's chaparral- and sage scrub-dominated landscapes would also result in high amounts of carbon release. Above-ground biomass of these shrub communities were found to be as high as 3461 g/m², with the amount of carbon stored increasing with the age of the stand (Bohlman et al. 2018). In addition, a substantial amount of carbon may be stored belowground in their roots and in the microbial communities and symbiotic fungi that are associated with the roots (Bohlman et al. 2018; Kravchenko et al. 2019; Soudzilovskaia et al. 2019). The removal and degradation of these systems have been found to result in the loss of both above- and below-ground carbon storage (*e.g.*, Austreng 2012). And although these systems are often overlooked in the fight against climate change, they are adapted to hot and dry weather conditions and have been found to be resilient to drought (Luo et al. 2007; Vicente-Serrano et al. 2013), which makes them an untapped opportunity to sequester more carbon as the climate crisis becomes exceedingly urgent. Therefore, the City should be prioritizing the preservation of carbon in existing ecosystems instead of releasing more greenhouse gases and destroying habitats with carbon storage potential for a Project that would destroy native ecosystems and exacerbate traffic congestion and air pollution.

Conclusion

Instead of allocating funds for a recreational ride that would diminish the ecological integrity of the largest interurban wilderness park in the country, the City should prioritize protecting and restoring the remaining intact ecosystems and native biodiversity; enhancing connectivity between natural open space to facilitate wildlife movement and climate resilience; and improving education, outreach, and accessibility to open space for low-income and minority communities that have historically had less access to green space. Such actions would promote healthy ecosystems and human communities and reflect the values and commitments made to Angelenos when Mayor Garcetti signed the Vision for Griffith Park in 2014 and the City's New Green Deal in 2019.

We believe that the City's expenditure of hundreds of thousands of dollars on consultants for this unpopular and harmful proposal constitutes an unwise use of scarce city resources. This is particularly true given the reduction in city revenues caused by the COVID-19 pandemic and resulting economic fallout. It is also unacceptable and out of step with the values of your constituents that the City's Wildlife Pilot Study has faced significant funding cuts while this wasteful proposal appears to be moving forward.

Thank you for the opportunity to submit comments on the proposed Griffith Park Aerial Tram Project. Please include the Center on your notice list for all future updates to the Project and do not hesitate to contact the Center with any questions at the email addresses listed below.

Sincerely,



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References

(Provided via OneDrive)

- Austreng, A. C. (2012). *The carbon budget impact of sagebrush degradation. Master's Thesis.* Boise state University.
- Benson, J. F., Mahoney, P. J., Vickers, T. W., Sikich, J. A., Beier, P., Riley, S. P. D., ... Boyce, W. M. (2019). Extinction vortex dynamics of top predators isolated by urbanization. *Ecological Applications*, 29(3), e01868.
- Bohlman, G. N., Underwood, E. C., & Safford, H. D. (2018). Estimating Biomass in California's Chaparral and Coastal Sage Scrub Shrublands. *Madroño*, 65(1), 28–46.
- Bonebrake, T. C., & Cooper, D. S. (2014). A Hollywood drama of butterfly extirpation and persistence over a century of urbanization. *Journal of Insect Conservation*, 18(4), 683–692.
- Cooper, D., & Mathewson, P. (2009). *Griffith Park Wildlife Management Plan (Final)*. Los Angeles, CA.
- Cooper, D. S. (2010). Rare Plants of Griffith Park, Los Angeles. *Fremontia*, 38, 18–24.
- Ernest, H. B., Vickers, T. W., Morrison, S. A., Buchalski, M. R., & Boyce, W. M. (2014). Fractured genetic connectivity threatens a Southern California puma (*Puma concolor*) population. *PLoS ONE*, 9(10).
- Gustafson, K. D., Gagne, R. B., Vickers, T. W., Riley, S. P. D., Wilmers, C. C., Bleich, V. C., ... Ernest, H. B. (2018). Genetic source–sink dynamics among naturally structured and anthropogenically fragmented puma populations. *Conservation Genetics*, 20(2), 215–227.
- Kravchenko, A. N., Guber, A. K., Razavi, B. S., Koestel, J., Quigley, M. Y., Robertson, G. P., & Kuzyakov, Y. (2019). Microbial spatial footprint as a driver of soil carbon stabilization. *Nature Communications*, 10.
- Luo, H., Oechel, W. C., Hastings, S. J., Zulueta, R., Qian, Y., & Kwon, H. (2007). Mature semiarid chaparral ecosystems can be a significant sink for atmospheric carbon dioxide. *Global Change Biology*, 13, 386–396.
- Riley, S. P. D., Serieys, L. E. K., Pollinger, J. P., Sikich, J. A., Dalbeck, L., Wayne, R. K., & Ernest, H. B. (2014). Individual behaviors dominate the dynamics of an urban mountain lion population isolated by roads. *Current Biology*, 24(17), 1989–1994.
- Soudzilovskaia, N. A., van Bodegom, P. M., Terrer, C., Zelfde, M. van't, McCallum, I., Luke McCormack, M., ... Tedersoo, L. (2019). Global mycorrhizal plant distribution linked to terrestrial carbon stocks. *Nature Communications*, 10, 1–10.
- Vicente-Serrano, S. M., Gouveia, C., Camarero, J. J., Beguería, S., Trigo, R., López-Moreno, J. I., ... Sanchez-Lorenzo, A. (2013). Response of vegetation to drought time-scales across global land biomes. *Proceedings of the National Academy of Sciences of the United States of America*, 110(1), 52–57.
- Vickers, T. W., Sanchez, J. N., Johnson, C. K., Morrison, S. A., Botta, R., Smith, T., ... Boyce, W. M. (2015). Survival and mortality of pumas (*Puma concolor*) in a fragmented, urbanizing landscape. *PLoS ONE*, 10(7), 1–18.



Friends of Griffith Park

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SMMC
Agenda Item 11
11/16/20

September 24, 2020

Mayor Eric Garcetti
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Via email

RE: Opposition to Griffith Park Aerial Tram

Dear Mayor Garcetti,

Friends of Griffith Park has carefully considered the four proposed Aerial Transit System (ATS) routes, as described by Stantec in the three quarter million dollar feasibility study initiated by the Department of Recreation and Parks (RAP). Three alignments were designed by Stantec, while another route was designed by Warner Brothers. After several meetings with Stantec's public relations firm, Consensus, Friends of Griffith Park strongly opposes all four routes.

The following comments are not comprehensive, but rather initial thoughts on the proposed ATS as we understand it.

A SOLUTION LOOKING FOR A PROBLEM

The stated purpose of the ATS is to reduce traffic and congestion per Dixon Comprehensive Strategies Report (Dixon Report). Instead, it adds another attraction to Griffith Park targeted to tourism. All the while, alternative strategies that will actually reduce traffic problems in tourist-affected areas lie on the shelf collecting dust.

The Stantec Team speaks as though the Dixon Report is a credible study. In fact, Dixon Unlimited is a parking consultant, with a motto, "Your Parking Coach," hardly accredited for solving congestion and traffic issues. While skilled at facilitating the two stakeholder meetings with representatives of the affected communities, their traffic studies were extremely limited and, at least in part, botched. The technical studies themselves lent little, if any, value toward deciding which strategies were placed on the list. More than anything, the report was a "catch all" list of ideas, some proposed by stakeholders, while others were not. The Dixon Report's Executive Summary lists strategies "Stakeholders were supportive of." An aerial tram was not on that list. The findings of the Dixon Report did not, by any stretch of the imagination, legitimize an aerial tram as a community-supported proposal, as has been suggested.

Of the 29 strategies, the ATS is by far the most expensive. Dixon Report lists an Aerial Tram as, "Category: Tourism, Traffic & Congestion; Priority: Medium; Cost: \$\$\$\$."

At the Council Committee approval level, some of the best, least expensive strategies were removed from the list of strategies moving forward to Council, without valid justification (eg, 2.2 Alternate Access Trail). In the June 15, 2018 Joint Report provided by the Chief Legislative Analyst (CLA) and RAP, it was said that, "all property adjacent to the North Beachwood Drive gate is privately owned." This is blatantly inaccurate, and verifiable with just a quick look at ZIMAS. However, based upon this misrepresentation, Strategy 2.2, a pedestrian access to replace the lost access at the closed Beachwood Gate, was flatly denied as a viable option to be pursued.

Several of the 21 Council-approved strategies have gone into the proverbial black hole (eg, 2.1 Electric shuttles), even though touted by RAP and Council District 4. Yet, the ATS was elevated both timewise and with study funding: \$750,000; the first \$600,000 approved on March 6, 2019, and an additional \$150,000 approved by RAP Commission on August 2, 2019.

Stantec has made it clear their job is merely to address questions and comments regarding the ATS itself. By relying

and referencing the Dixon Report, Stantec has falsely validated the ATS as a real viable solution to traffic and congestion problems.

It's common sense that the ATS is by far the most expensive strategy discussed in the Dixon Report, and yet it moves ahead of all others? Nor does it solve the problems of traffic and congestion in tourist-affected areas. While Stantec consultants are very careful in their refusal to say "tourist" and "amusement park ride," there would likely be an increase in net traffic. Certainly, freeway (I-5 and I-134) traffic would increase, as well as traffic along Los Feliz Boulevard. All four ATS options place importance on the ability to provide additional parking for cars, yet no significant accommodations are proposed to connect with mass-transit, such as the Red Line. And, no vehicles are actually removed in total; they are merely redeployed to other areas.

ATS does not fit the stated goals. Was the goal of the Dixon Report from the start more about tourism than resolving traffic? Interestingly, the preamble of the Council Motion for its funding referenced "last year's [2017] record Los Angeles tourism numbers (48.3 million visitors) and the critical role tourism plays in LA's job growth and economy." Perhaps the answer lies there.

Consensus, the public relations firm hired by Stantec to do the public outreach, has been duplicitous in their terminology. One of their consultants accidentally slipped and said "tourism." During the recent town hall, several members of the public submitted questions that included the words "tourist" and "amusement park ride." The consultant reading the questions reworded the questions carefully omitting those offensive words.

In describing Route 3, Consensus refers to the "Zoo Magnet Center," never mentioning that it is the highly respected LAUSD Zoo Magnet School. It was clear to all that Consensus did not want anyone to know that Route 3 would destroy a school. Further, no mention was ever made of the adjacent Griffith Observatory Satellite where the Observatory prepares its acclaimed planetarium programs. Consensus may be pretending it does not exist.

CONFLICT WITH CITY-APPROVED POLICIES

Two significant City-approved documents have much to say about protecting Griffith Park's open space and its delineated wilderness area.

***A Vision for Griffith Park* (2014)**

Selected text represents potential conflicts with the proposed ATS:

- "The defining characteristic of this resource can be traced to the original intent of the Park's benefactor, Colonel Griffith J. Griffith. Colonel Griffith donated his land to the City to provide Angelenos with a natural respite from the surrounding metropolis. He envisioned a park that would be a "safety valve" from urban pressures providing "open space – rustic and available to all." *p.8*
- "Promote and encourage an Urban Wilderness Identity for the entirety of Griffith Park," including: "biodiversity, native species, minimal maintenance required for viability, unstructured aesthetic and a built environment that reflects these characteristics and promotes the sense of place that is characteristic of Griffith Park." *p.7-11*
- "Finally, all structures should be aesthetically compatible with the Park's natural surroundings and wilderness character." *p.41*
- "Power and communication lines and poles are visible throughout the Park and negatively impact the Park environment, scenic views and vistas. To eradicate this negative impact all aboveground utilities should be placed underground. This should be a priority item." *p.48*
- "H. Avoid infringing upon natural areas; 3. Preserve the identified Wilderness area" *p.55*
- "No new parking structures should be introduced within the boundaries of the park." *p.63*
- "1. At this time, there is no clearly identified need for new recreational rides, such as railroads, aerial tramways or funiculars." *p.67*

Historic-Cultural Monument # 942

The Historic-Cultural Monument application introduced Griffith Park as the "largest urban wilderness park in the United States." The application states, "Large portions of this landscape appear to retain integrity dating back to the period of the Gabrielino Indians who were the earliest known inhabitants of the region."

Various built amenities and features were created in Griffith Park for educational and recreational reasons, some of

which are now vested as “Historically Sensitive Resources and Areas.” “The Wilderness Area is a Historically Sensitive Resource,” per the Monument status documentation adopted by the City of Los Angeles on January 27, 2009.

All proposed ATS alignments take routes encroaching upon designated Wilderness Area. In fact 95-100% of each alignment will cross Wilderness Area terrain. The very character of these natural areas will be spoiled by the visual intrusion of a gondola alone, even before one considers the adverse biological impacts. Surrendering Griffith Park as a “wilderness park” would be a colossal cultural loss for Los Angeles.

OUT OF CONTEXT WITH GIFT

Griffith’s gift in 1896 would be dishonored and very well could affect the good intentions of other philanthropists in the future.

In 1910, Colonel Griffith penned a small booklet entitled “*Parks, Boulevards and Playgrounds*.” Griffith strongly reminded the City of his gift of Griffith Park to Los Angeles, after seeing it being systematically destroyed. Griffith noted his conviction that the Park should be a place where families struggling to make ends meet could escape urban pressures and enjoy the healing power of “open space, rustic and available to all.” Now his visionary proclamation of the “healing powers of nature” is supported by notable health organizations, preached by many nature/environmental organizations and backed by science.

Only a few of the City’s parks still retain precious native habitat which is truly the ultimate product of Mother Nature. Griffith Park includes vast acres of rich native Mediterranean habitat, a highly biodiverse ecotype declining faster than the tropical forests of the world. Decisions for protecting Griffith Park must be based upon principles and priorities to protect these natural lands, as Colonel Griffith demanded.

Since his death, the Colonel’s ambitious advocacy for the park has been carried out by Griffith descendants and the family’s charitable trust members. Throughout the decades, attempts to deviate from the Colonel’s vision for Griffith Park, or exploit it, have been met with fights with the City, and sometimes lawsuits. It is incumbent upon our City leadership to respect one of the most significant gifts ever given to the people of Los Angeles.

ENVIRONMENT

Above all, our concern is for the inevitable permanent destruction of open space, habitat, and wildlife such an enormous project would inflict upon Griffith Park. Perhaps our City leaders have forgotten that Griffith Park is the richest natural resource in the entire LA Basin, and that it represents the largest contiguous expanse of open space in the Eastern Santa Monica Mountain Range.

FoGP is well aware of how projects move forward, in apparent full compliance with State-mandated environmental law, yet relegate pristine habitat to rubble. Protecting these remote habitat areas with rare or sensitive flora from damage should be a priority for the managers of these wildlands, L.A.’s Department of Recreation and Parks.

It is inconceivable that placing as many as 24 towers, mostly on chaparral or shrub habitat never stepped upon by other than the park’s wildlife, will not have major consequences on plant communities. Delicate microhabitats along ridgelines are precisely where many of the towers are plotted. These ridgelines are also home to plants such as *Eriastrum sapphirinum* (Sapphire woollystar), *Calochortus plummerae* (Plummer’s mariposa lily), and *Chorizanthe staticoides* (Turkish rugging), not just the more hardy chaparral/shrub species.

The charting of sensitive species, as presented by Stantec to promote the aerial tram to a largely biologically-naïve public, is completely irresponsible. First, there is little evidence that Stantec even had a licensed biologist look at these lands at all, as represented during one of the “Pop-up” sessions. Second, the database (California Natural Diversity Database) used to represent sensitive species in Griffith Park is seldom used by biologists working specifically in the area. In fact, more well-known datasets were not used. During the “Open House” Q/A, the Stantec panelist addressing biology admitted not knowing about *iNaturalist*.

That said, very few records of sensitive plant species would show up on any flora dataset since these ridgelines are not open to hikers; no one treads there. The most respected and knowledgeable local ecologists were not consulted because had they been consulted, it would quickly become clear that these tower locations are known to have sensitive flora species, including various *Calochortus* species. In fact, RAP’s own *Griffith Park Wildlife Management Plan* (2014) was overlooked by Stantec.

Another significant risk of disturbing areas around tower locations is the unintentional introduction of invasive species, a huge threat to the delicate balance that nature has achieved on its own. If project study and planning con-

tinues, no doubt rhetoric regarding restoring construction-affected habitat will be part of the typical pro-project narrative. Experts can tell you this is not fully possible.

Regarding wildlife, even more preposterous is Stantec's mapping of the park's wildlife. The American badger, for example, shows up in a small zone of Griffith Park, one species that disappeared from Griffith Park many decades ago. Four bat species listed as sensitive are shown as limited to distinct zones far from the proposed gondola. Yet, we know they fly freely over many areas of the park. We are aware of a peregrine falcon breeding area not shown. And most obvious, the California Endangered Species Act-listed mountain lion species is not on the map, although Stantec verbally acknowledged knowing about Griffith Park's famous mountain lion P-22.

To highlight our concern for various reptiles, *Phrynosoma blainvillii* (Blainville's horned lizard) are present on the ridgelines where towers are proposed. This species is already extremely scarce in Griffith Park. The results of a local genetics study on this species, with Griffith Park being part of the study area, should be known by early next year. Results of this study may give clues to whether subpopulations have become so separated genetically that it is doomed. Few colonies remain in the park, and some herpetologists think it relates to the loss of their main diet, harvester ants, due to introduction of the non-native, invasive Argentine ant. This horned lizard species is listed by California Department of Fish and Wildlife (CDFW) as a "special species of concern."

Along the same lines, the *Aspidoscelis tigris stejnegeri* (San Diegan tiger whiptail lizard) is also listed as a CDFW "special species of concern." We are seeing population declines even as this species is present across large portions of the wild terrain where towers will be erected and maintained. The San Diegan tiger whiptail lizard is considered a vulnerable Southern California subspecies.

Regarding Option 4, adverse impacts on flora and fauna in constructing a cantilevered platform on the very steep slope below the Hollywood Sign are daunting.

In summary, Stantec seems to imply that it's okay to disturb the wilderness area of Griffith Park as long as sensitive flora and fauna species are not near the ATS route, as their inadequate mapping suggests. Besides sensitive-listed species, other flora and fauna of Griffith Park are also important to the long-term health of the park. This is especially true for those which have limited numbers or distributions. Species can be "rare and endangered" in Griffith Park without being rare within the State of California. The "biological analysis" section on the ATS website, along with the uninformed representations made by Stantec staff during their outreach to the public, is unprofessional and misleading salesmanship.

ADVERSE IMPACT ON RECREATION

The impact on current park users during this proposed massive infrastructure undertaking is unimaginable. Large-scale closures would limit access of hikers, equestrians and other park users during the long construction period. Towers erected along both sides of Mulholland Trail (misabeled as Mt. Hollywood Trail on all Stantec's topographical maps) would preclude thousands of hikers from pursuing pilgrimages to Mt. Lee. Mulholland Trail is a heavily used trail in close proximity to many of the proposed towers.

Option 4 would also put a damper on hikers going to the top of Mt. Lee during the construction period near the Eileen Getty Trail access. Depending upon the alignment proposed, other trails may also be affected during construction, including the trail near Baby Bell, Mt. Chapel, trails near Amir's Garden, and many others.

The permanent adverse impacts on the user groups are even more concerning. Equestrian traffic from Sunset Ranch to Mt. Hollywood Road along this same stretch would likely need to be eliminated or restricted to only the most experienced riders. Horses are extremely sensitive to peripheral motion, which sometimes leads to a spooking or bolting response. It would be ill-advised for RAP to allow rental or tour horseback riding with gondola cars passing overhead at even fifty feet away. Currently, the plan indicates that the bottom of gondola cars will pass as close as 17 feet above the ground!

Hikers and other passive recreationists have expectations of a natural experience while in Griffith Park. That is its charm and character. Within the more remote and wild interiors of the park, the introduction of a massive mechanical infrastructure with moving parts will be especially unsettling. It's also unclear what amount of sonic disturbance will be introduced, as both the cable lines and gondola cars containing visitors emit noise. At a minimum, the visual blight of this colossal ride across the park's interior presents a significant adverse impact on the quality of the park experience.

SAFETY AND EVACUATION

Many unanswered questions have been asked about the safety of a two-mile ATS over rugged terrain prone to regular brush fires. According to City Park Ranger brush fire data, an average of eight significant brush fires (.25

acre or more) per year occurred over the last three years (2017-2019), a total of 177.5 acres. While a closed-loop tram system might be taking some passengers further from harm's way during a fire event, the opposite direction might be taking them closer to the brush fire. For this reason, it's logical to assume that passengers may be put at risk, with no control over self-escape, a terrifying prospect.

A brush fire event may be one of the reasons an evacuation becomes necessary, but there are others, as well: power failure, unexpected Santa Ana winds, and mechanical or computer failures. At this time, it's unclear how such evacuations would be accomplished, especially considering these gondola cars would be traveling over inaccessible ground and the sheer number of cars. If rescues could even be accomplished by helicopter, it is unclear how long it would take to evacuate riders.

The only urban "mono-cable detachable gondola" in California was completed in 2017 at the Oakland Zoo after many years of an \$80 million construction project. Roughly one-third mile long, it's less than one-sixth the length of proposed options # 1, 2, and 3. The Oakland Zoo gondola has only seven towers versus 21-24 towers for Griffith Park's proposed options # 1, 2, and 3. In 2018, a glitch shut down the Oakland Zoo gondola containing 80 frightened passengers, including one passenger in a wheel chair. These passengers were captive for an additional 30 minutes beyond the expected 4-minute ride. A shut down of such a large system, proposed for Griffith Park, would amplify the terror of those waiting to be rescued.

Our changing climate, with prolonged periods of high temperatures is another concern, especially since high tourist levels occur during the summer months. While we have been told that the gondola cars are completely enclosed, such that a passenger could not toss litter or a cigarette, the question of the existence of active, powered air ventilation remains unanswered. We understand that heat and ventilation are major challenges for gondola operators throughout the world, such as the Maokong Gondola of Taipei.

NEXT STEPS / SUMMARY

Santec has indicated that the financial analysis, along with a safety analysis are next aspects to be evaluated by sub-contractors. Whether these studies might shed light on the advisability of a project or not, continuing with any further facets of the ATS study now represent irresponsible spending of City funds.

The City has fast-forwarded to an economic period of time which differs vastly from two years ago, and has now declared a "fiscal emergency" due to loss of revenue from COVID-19 shut downs. Is an ATS still really feasible now?

In light of this downturn, FoGP respectfully requests an early termination of the Stantec work. The City should cut its losses now. If none of the \$750,000 contract is recoverable, at least the time and energy of City staff will not further drain already reduced staff budgets.

In closing, history does indeed repeat itself. Many previous aerial tram concepts have been proposed for Griffith Park, although with different alignments. What is always the same, though, is the consistent, predictable outrage expressed by the public in response, all for good reasons. This ill-conceived aerial tram feasibility study should be ended now.

Thank you for your consideration.



President, Friends of Griffith Park

cc: David E. Ryu, CD 4

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California Native Plant Society

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September 23, 2020

SMMC
Agenda Item 11
11/16/20

Mayor Eric Garcetti
City of Los Angeles
200 N. Spring St.
Los Angeles, CA 90012
Via email

RE: Opposition to the proposed aerial tram in Griffith Park.

Dear Mayor Garcetti:

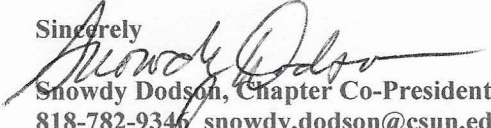
On behalf of the California Native Plant Society, Los Angeles/Santa Monica Mountains Chapter, I am writing to express our dismay regarding the the proposed aerial tram in Griffith Park. We feel that this tram would be a slap in the face to the City's sustainability and environmental protection goals by permanently disrupting the shrub/chaparral habitat that defines the beauty and worth of the wild areas of the Park.

I would like to state upfront that our Chapter advocates for preserving all possible open natural space within the City. Such spaces and their resident native flora provide the necessary habitat and food to sustain the native animals we are so lucky to have in our midst. They are also prime centers of carbon sequestration and are part of the wildlife corridors that are key to the safe travel/migration of our urban fauna. The heart of Griffith Park in its wild state creates frontline protection for creatures such as P-22 and their habitat in the Santa Monica Mountains within our City limits. The Park is also home to numerous rare and threatened plants and animals. Consult the [Griffith Park Wildlife Management Plan](#) submitted to LA City Recreation and Parks in January 2009 for further details on the extensive ecological value the Park provides.

[The Visions for Griffith Park](#) that you signed in 2014 calls for the preservation of wildlife, wildlife corridors, native flora and fauna and park biodiversity. An aerial tram cutting two miles into the heart of the Park along an untouched narrow ridgeline together with a viewing platform on Mount Lee near the Hollywood sign would permanently disrupt this unique urban wilderness. In fact, that document clearly states that there is no need for recreational rides such as an aerial tram, and any ingress and egress to the Park should support its urban wilderness identity.

The California Native Plant Society is a state-wide organization of 10,000 members dedicated to the preservation, conservation and enjoyment of California native plants and their habitats. The Los Angeles/Santa Monica Mountains Chapter is one of 35 regional chapters located in the state. For many years, we have worked tirelessly to protect the native flora and preserve open natural spaces in our area and oppose any efforts to enable unsustainable development in the region. A building a tram into our City's natural heart is not sustainable but would disrupt

Sincerely


Snowy Dodson, Chapter Co-President
818-782-9346 snowy.dodson@csun.edu
Cc: City Council Members; Friends of Griffith Park

References: <https://www.friendsofgriffithpark.org/wp-content/uploads/2016/10/GP-WMP-Final.pdf>
<https://www.laparks.org/sites/default/files/griffith/pdf/agenda/visionPk.pdf>



Dedicated to the preservation of California native flora





Griffith Park Advisory Board
"Citizen Stewards of L.A.'s Premiere Urban Wilderness and Park"
Department of Recreation and Parks, City of Los Angeles

October 2, 2020

City of Los Angeles Board of Recreation and Parks Commissioners
CC: Mike Hain
CC: Stephanie Smith
CC: Councilmember David Ryu

Re: Proposed Aerial Transit System for Griffith Park

Dear Commissioners,

We are writing to express our opposition to an aerial transit system (ATS) for Griffith Park, and to share our rationale for opposing it. Based on our recent meeting with the feasibility project team and our deliberations that followed, we have reached the conclusion that an ATS will not meet the needs of our city, its great urban park, or the park's many stakeholders. In fact, we find that such a project would diminish the character of Griffith Park as an urban wilderness, and could threaten the well-being of the park's flora and fauna. As a result, the Griffith Park Advisory Board recommends that city officials not pursue an ATS.

As you are well aware, the important issues of transit and mobility in and around the park require thoughtful solutions. This board fully supports the goal of reducing and eventually eliminating private vehicles from Griffith Park. If we had reason to believe that an ATS would move the park toward that goal, we would consider it for more rigorous study. Yet during their presentation to our board on September 24th, members of the Stantec / Consensus project team acknowledged that the proposed ATS would not meaningfully reduce traffic inside Griffith Park.

Further, while the project team stated that an ATS could help alleviate traffic in some of the heavily impacted neighborhoods around the park, they made clear that the ATS would be only a partial solution to that problem. And with the lead engineer stating that the price could be between \$50-100 million – not to mention other estimates that are even higher – we believe it is incumbent upon city officials to explore less costly, time-consuming and controversial strategies to meet this worthy goal. The Dixon report in January 2018 laid out 29 ideas to address access, mobility and related issues, and the City Council endorsed nearly two dozen for further study. Yet among these many ideas, few have received as much scrutiny or funding as the proposed ATS. We would ask city officials to prioritize other solutions that may provide faster, better and less-costly ways to meet policy-makers' goals.

Additionally, there remain important considerations related to the overall character of Griffith Park. Many stakeholders have expressed deep concern about the idea of a gondola ride serving tourists that would

forever change the urban wilderness of Griffith Park. We share those concerns, and fail to see an overriding policy objective to outweigh them.

Having laid out our main reasons for opposing the ATS, we want to assure you that we have not done so lightly. We are aware that city officials have committed a large expenditure on a feasibility study, and we have participated in that study with all due diligence. Last fall, our board unanimously approved a set of principles and issues to guide our review of any ATS proposal and shared it with the Feasibility Study's team. A majority of our members has concluded that the project team did not adequately address our requests, and that the merits of an ATS project do not outweigh its flaws. While a few of our members would have preferred to see more data prior to making a decision to support an ATS or not, a strong majority agreed we had sufficient data to reach a conclusion now.

In closing, we appreciate that city funds are at a premium, and ought to be directed toward those services and solutions that serve an essential need. We do not believe that an ATS for Griffith Park would serve such a need, and we urge you to prioritize other policy solutions. We respectfully recommend that the ATS be retired from consideration.

Sincerely,

Ron Deutsch
Chair – Griffith Park Advisory Board

Laura Howe
Vice Chair

Jason Greenwald
ATS ad hoc committee chair

BOARD MEMBERS:

*Chip Clements, Michelle Cramos, Gene Gilbert, Mike Hain,
Laura Howe, Sheila Irani, Bryan Mercke, Lucinda Phillips*



CITIZENS FOR
LOS ANGELES
WILDLIFE

SMMC
Agenda Item 11
11/16/20

PO Box 50003 Studio City, CA 91614
805-225-4766 info@clawonline.org www.clawonline.org

October 19, 2020

Los Angeles Mayor and City Council
200 N. Spring Street
Los Angeles, CA 90046

Re: Opposition to aerial tramway in Griffith Park which will significantly impact wildlife

Honorable Mayor and Councilmembers:

Citizens for Los Angeles Wildlife (CLAW) is a non-profit environmental organization concerned with the wellbeing of wildlife and wildlife habitat for the City of Los Angeles and beyond. A citizenry of more than 5000 individuals support our organization's multiple calls for biodiverse practices and policy to benefit LA City, County, California, and the globe. Our organization opposes further contemplation of any aerial tramway proposal, as the Griffith Park ecosystem, as it stands, is in an ecologically tenuous condition with guarantees of further deterioration that would be exacerbated by an aerial tram.

Justification:

The Griffith Park ecosystem is already far-undersized to support long-term sustainable populations of mule deer, bobcats, and gray fox. That population sustainability is dependent on improved genetic flow from outside populations via the Cahuenga Pass and perhaps via the Verdugo Wash and Los Angeles River. It is also dependent on maximizing both the quantity and quality of the remaining habitat in the ecosystem, including the private lands that border Griffith Park. Time will tell how many of these private lots are protected versus developed.

With a near-permanent trajectory of drying weather conditions, habitat quality of every natural acre in the park will continue to diminish accordingly. Some, probably inevitable, residential construction on private lots that border the park will reduce the quantity of habitat. In addition, population pressures and social distancing will result in an ongoing increase in park visitation numbers and hours of use, as well as the presence of dogs, which all result in inevitable habitat decline even if there is strict adherence to established trails and park hours.

No new natural land can be added to the Griffith Park ecosystem and any net spatial intrusion into the remaining habitat will result in the permanent incremental loss of an already receding ecosystem capacity. That spatial intrusion includes the more indirect effects of brush clearance around structures, maintenance, lighting, and more frequent human and dog presence. The direct intrusions from a tramway would cause unavoidable significant adverse biological impacts, which cannot be

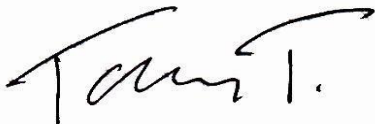
fully mitigated. Habitat enhancements cannot replace existing spatial separation of people and wildlife, or separation between competing wildlife home ranges. **The sheer presence of such a multi-mile tramway through the already teetering Griffith Park ecosystem would permanently strain the park's ability to support wildlife populations.**

An elevated tramway through and above the park's natural areas would result in the permanent ecological deterioration of a linear strip that will bisect some core habitat areas. Each tower would require a maintenance road which would create more permanent linear disturbance strips. A higher elevation tramway endpoint destination would create a permanent disturbance area with a concentric ring of permanent indirect ecological impacts. That endpoint destination would need to be serviced by frequent vehicle trips. An overhead cable tramway would permanently diminish the capacity of miles of affected area below to provide the solitude necessary for less human tolerant species such as mountain lions, bobcats, gray foxes, mule deer, and raptors including owls. The permanently drying climate will reduce vertical (and all other) vegetation cover and thus reduce visual separation between wildlife and the tramway. Wildlife need shrub cover to hide, and for shade. The "visual" degradation of key shaded areas would be exacerbated because with less soil moisture over time, there will be less shaded areas, which in turn would be imperfectly distributed for separation between animals and from humans. **A tramway would hasten the decline of all of the aforementioned species in the Griffith Park ecosystem with no potential for reversal.**

Solution:

An immediate and superior solution to the negative neighborhood impacts created by tourists seeking access to the Hollywood sign is the acquisition of 18 acres of land currently for sale in the Cahuenga Pass. This property takes access from 2864 Cahuenga Boulevard and includes a cleared, level, graded, multi-acre parking area. It also includes a dirt road constructed to City grading standards leading to a magnificent view of the Hollywood Sign, Lake Hollywood, Mount Lee, and the city scape. This view area abuts DWP property. No neighborhoods would have to be traversed to reach this site that is for sale. It could also provide extra parking for the Hollywood Bowl and is easy walking distance from the Ford Theater. It is at the edge of the Griffith Park ecosystem, and its public acquisition would permanently protect at least 14 acres in the critical habitat interface area with the Mulholland Drive freeway overcrossing. All of the vehicle impacts would occur directly next to Cahuenga Boulevard and the 101 freeway. It is even on an MTA bus line between Hollywood and Universal City. **The acquisition and initial parking set up would cost less than the EIR and initial engineering for a tramway.**

Sincerely,

A handwritten signature in black ink, appearing to read 'Tony T.', with a stylized flourish at the end.

Tony Tucci, Chair

CLAW is a public benefit non-profit 501(c)(3) environmental organization that works to protect and restore the environments of wildlife of Los Angeles and California from dwindling open spaces. Our mission is to promote, educate and protect the fundamental importance of wildlife, wildlife habitats and wildlife corridors everywhere.