

1.0 INTRODUCTION

The Final Environmental Impact Report (EIR) for the Los Angeles Zoo Vision Plan (Project; Vision Plan) was previously prepared by the City of Los Angeles (City), Public Works Department, Bureau of Engineering (BOE) and published in June 2021. Focused sections of the Final EIR have been revised to address a new project alternative that was prepared in response to public comments received by the City and Los Angeles Zoo and Botanical Gardens (Zoo).

The City is the Lead Agency for the proposed Project, pursuant to Section 15367 of the CEQA Guidelines. This Focused Recirculated EIR has been prepared by and under the direction of the City. This EIR was prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.); the Guidelines for the Implementation of the California Environmental Quality Act (CEQA Guidelines) (California Code of Regulations Sections 15000 et seq.); and the City's environmental guidance documents (i.e., Los Angeles City CEQA Guidelines and L.A. CEQA Thresholds Guide: Your Resource for Preparing CEQA Analyses in Los Angeles).

Pursuant to the CEQA Guidelines, Section 15088.5(a), the City is required to recirculate an EIR when significant new information is added after public review of the Draft EIR but before certification. Significant new information can include changes in the project or environmental setting, as well as additional data or other information. New information added to an EIR is not significant unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse effect of the project or a feasible way to mitigate or avoid such an effect (including feasible alternatives).

Pursuant to CEQA Guidelines, Section 15088.5(c), if the revision is limited to a few chapters or portions of the EIR, the City need only recirculate the chapters or portions that have been modified. In accordance with CEQA, this Focused Recirculated EIR comprises the portions of the EIR that have been revised to include new information and are being recirculated for public review, including:

- Section 1.0, *Introduction*: Expanded description of the recirculated portions of the EIR, including the public review process.
- Section 4.0, *Alternatives*: Expanded to include a description and analysis of Alternative 1.5, the California Focused Conservation Alternative.
- EIR Appendix O, *Alternative 1.5 Project Description*: Provides a detailed description of the new California Focused Conservation Alternative. A copy of the planning document 2022 Vision Plan – Alternative 1.5 is also included.
- EIR Appendix P, *Parking Analysis for Alternative 1.5*: Provides a summary of a parking demand analysis for Alternative 1.5 and recommendation for a peak visitor management program (PVMP).

- EIR Appendix Q, *Animal Welfare Area Assessment*: Provides a comparative analysis of the area that would be dedicated to animal welfare under the implementation of the Project and EIR alternatives.

Details regarding public review and comment on the Focused Recirculated EIR are provided under Section 1.4.3, *Review of the Focused Recirculated EIR*. Additional details regarding the contents of the Focused Recirculated EIR are provided under Section 1.6.2, *Focused Recirculated EIR*.

1.1 BACKGROUND AND PROJECT OVERVIEW

The proposed Project is located at 5333 Zoo Drive in the City of Los Angeles, in the southern portion of Los Angeles County. It is generally bordered by the Golden State Freeway or Interstate 5 to the east and the Ventura Freeway or California State Route 134 to the north. The 142-acre Project site (comprising 133 acres of the Zoo campus and 9 acres of adjacent roadway) is in the northeastern portion of Griffith Park, at the base of the foothills of the Santa Monica Mountains. The Los Angeles River flows within 900 feet of the Project site at the base of Griffith Park. Project site topography is undulating with approximately 150 feet of elevation change; however, interior portions of the Zoo are relatively flat resulting from the previous placement of fill soils during Zoo construction.

The City is proposing to construct and operate the Project. The Project would guide future development and modernization of the Zoo for the next 20 years. The Project would include comprehensive redesign and redevelopment of the Zoo to replace outdated buildings and infrastructure and upgrade animal care and guest amenities. The Project would result in the following:

- Expanded and revitalized immersive exhibit space for improved animal welfare and the Zoo's conservation and endangered species propagation and preservation programs;
- New and redeveloped visitor-serving facilities for enhanced visitor experience, including three visitor centers, picnic and restaurant locations, and internal circulation and walking paths;
- Expanded and modernized administrative and services facilities to support state of the art exhibits and upgraded visitor support facilities;
- Circulation improvements for access roads, pedestrian walkways and paths, an enhanced entryway and plaza, and new parking facilities;
- Inclusion of environmentally sustainable design features within the Zoo's built structure; and
- Operational excellence of the Zoo.

Improved and expanded facilities would allow for annual visitation to grow by approximately 1.2 million guests annually to reach 3.0 million guests annually by 2040. Improvements

would be made through seven sequential phases of development. Project implementation would involve demolition of existing buildings, installation of new facilities, and construction of new pathways and circulation infrastructure.

The EIR addresses alternatives to the Project, including a No Project alternative prepared consistent with the CEQA Guidelines Section 15126.6(e)(1), as well as Alternative 1 (Reduced Project Alternative) and Alternative 2 (Multi-modal Transportation Alternative). As part of this Focused Recirculated EIR, an analysis of Alternative 1.5 (California Focused Conservation Alternative) is provided in Section 4.0, *Alternatives*.

1.1.1 Areas of Known Public Controversy

CEQA Guidelines Section 15123 states that an EIR shall identify areas of controversy known to the Lead Agency, including issues raised by the agency and the public. Based on comments received during the scoping public meetings and NOP/IS comment period and review of the EIR, the following issues are known to be of concern and may be controversial. Each issue is evaluated in the EIR:

- Transportation impacts to local roads;
- Parking adequacy;
- Improved multi-modal access;
- Loss of trees and vegetation;
- Impacts on sensitive species;
- Visual impacts of Zoo redevelopment on Griffith Park visitors, including hikers and equestrians on public trails;
- Animal welfare during construction and operation;
- Discovery of cultural and/or tribal cultural resources during construction;
- Water use and conservation, including recycled water;
- Disabled access and stroller access to Zoo exhibit areas;
- Noise and light impacts on sensitive receptors, including Griffith Park;
- Air quality and GHG emissions from construction and operation;
- Recycling and disposal of construction/demolition waste; and
- Impacts of nighttime events.

1.2 ORGANIZATION OF THE EIR

The EIR is organized into the following sections:

- Section 1.0, *Introduction*, summarizes the background of the Project and explains the environmental review process.
- Section 2.0, *Project Description*, provides a detailed description of the Project site, Project objectives, and all proposed Project components, including Project phasing and implementation.

- Section 3.0, *Environmental Impact Analysis and Mitigation*, provides analysis of applicable federal, state, and local regulations, existing environmental conditions, specific direct and indirect Project impacts, cumulative impacts, mitigation measures, secondary impacts, and residual impacts.
- Section 4.0, *Alternatives*, describes alternatives to the Project, and identifies the Environmentally Superior Alternative.
- Section 5.0, *Other CEQA Sections*, identifies significant and irreversible, growth-inducing, and unavoidable effects, and a brief discussion of resource areas that would not be significantly affected by the Project.
- Section 6.0, *List of Preparers*, identifies the EIR Project team.
- Section 7.0, *References*, provides information about resources used in the preparation of the EIR.
- Section 8.0, *Response to Comments*, includes responses to all written and oral comments received from the public, organizations, and agencies on the Draft EIR.
- Section 9.0, *Mitigation Monitoring and Reporting Plan*, provides the required mitigation program for the Project, including timing, responsible parties, and monitoring.

Appendices to the EIR include the IS/NOP, NOP comment letters, the Draft Vision Plan and 2022 Vision Plan – Alternative 1.5, and supporting technical studies used as a basis of information and analyses in preparation of the EIR.

1.3 PURPOSE AND INTENDED USE OF THIS EIR

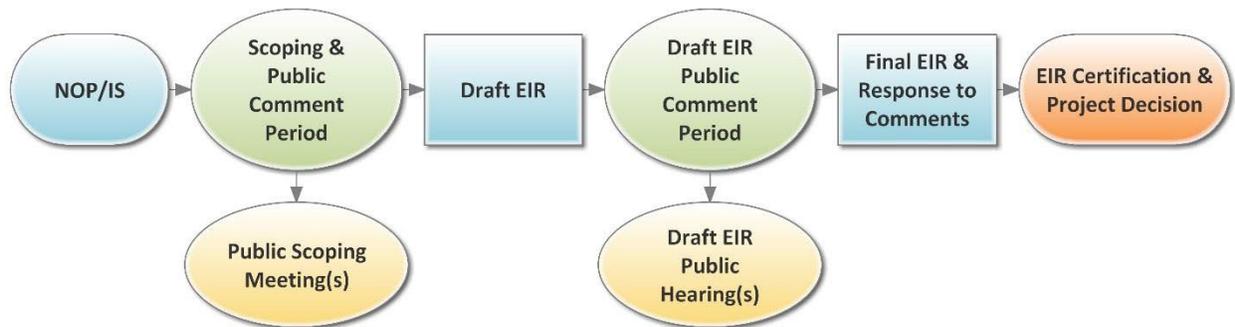
The purpose of an EIR is to inform decision-makers, responsible and trustee agencies, and the public of the potential environmental impacts that could result from a project. Under the provisions of CEQA, “the purpose of the environmental impact report is to identify the significant effects of a project on the environment, to identify alternatives to the project, and to indicate the manner in which significant effects can be mitigated or avoided” (Public Resources Code 21002.1[a]). The CEQA process was established to enable public agencies to evaluate a project in terms of its environmental consequences, to examine and implement methods of eliminating or reducing any potentially adverse impacts, and to consider alternatives to the project. CEQA Section 15021(a) requires that major consideration be given to avoiding environmental damage. CEQA requires full disclosure and consideration of the unavoidable environmental risks, as applicable, against the economic, legal, social, or other benefits of the project as part of decision-maker approval proceedings.

Responsible and trustee agencies are public agencies responsible for certain discretionary Project approvals or implementing specific onsite and/or offsite components of the Project. For the purposes of CEQA, a “responsible agency” includes all public agencies other than the Lead Agency that have discretionary approval power over the Project (CEQA Section 15381). A “trustee agency” is defined as a state agency having jurisdiction over certain resources held

in trust for the people of California but do not have legal authority for approval of the Project (CEQA Section 15386).

The CEQA process is initiated when the Lead Agency identifies a proposed project. The proposed Project requires several discretionary approvals (see Section 2.0, *Project Description*). Therefore, the proposed Project is subject to environmental review requirements under CEQA. The general EIR process overview and key milestones are depicted here:

EIR Process Overview & Milestones



1.4 PUBLIC OUTREACH & ENGAGEMENT

1.4.1 Notice of Preparation & Scoping

On January 24, 2019, the City issued a Notice of Preparation (NOP) to request comments on the scope of the EIR and included a brief description and background of the Project, key Project components, and a description of potential environmental resource areas affected by the proposed Project. The NOP/Initial Study (IS) was circulated for public review for a 45-day period from January 24, 2019 to March 11, 2019. The NOP was made available in both English and Spanish and published online at: <https://eng.lacity.org/los-angeles-zoo-vision-plan>. Copies of the document were also made available for review at the following locations:

- Los Angeles Central Library, 630 W. 5th Street, Los Angeles, CA 90071
- Los Feliz Branch Library, 1874 Hillhurst Avenue, Los Angeles, CA 90027
- Atwater Village Library, 3379 Glendale Blvd., Los Angeles, CA 90039
- Cahuenga Branch Library, 4591 Santa Monica Blvd., Los Angeles, CA 90029
- Burbank Central Library, 110 N. Glenoaks Blvd., Burbank, CA 91502
- Glendale Downtown Central Library, 222 E. Harvard St., Glendale, CA 91205
- North Hollywood (Amelia Earhardt Regional) Library, 5211 Tujunga Ave., North Hollywood, CA 91601
- Buena Vista Branch Library, 300 N. Buena Vista, Burbank, CA 91506
- LA Zoo Administration Offices, 5333 Zoo Drive, Los Angeles, CA 90027

- City of Los Angeles, Bureau of Engineering, 1149 S. Broadway, Suite 600, Los Angeles, CA 90015

Two public scoping meetings were held during the public review period to solicit comments from interested parties on the content of the EIR. Spanish translation services were provided for both meetings. These meetings were held on Thursday, February 7, 2019, from 6:00-8:00 p.m. and Saturday, February 9, 2019 from 11:00 a.m. – 1:00 p.m. in the Witherbee Auditorium at 5333 Zoo Drive Los Angeles, California 90027.

Appendix B contains the NOP and comments and input received during the review period that was considered in preparing the scope of this EIR (CEQA Guidelines Section 15082). The City received approximately 60 sets of comments in the form of letters, emails, interviews verbal comments, and comment or speaker cards provided at public scoping meetings, from community residents, stakeholders, agencies, and organizations. These comments are provided in Appendix C. All comments were considered by BOE during preparation of this EIR.

In addition to EIR scoping in compliance with CEQA requirements, the City also engaged in stakeholder outreach and interviews to solicit input and comments directly. The City conducted a total of 13 in-person stakeholder interviews, including with Los Angeles City Council staff, representatives of nearby neighborhood councils and/or homeowner and tenant associations, Griffith Park representatives, schools, and members of environmental and transit organizations. Through these interviews, the City learned of key concerns of these stakeholders, including those related to transportation and traffic, land use and planning, urban forest, construction emissions, and habitat and biological resources impacts, and BOE then factored these issues into this EIR analysis.

1.4.2 Review of the Draft EIR

The Draft EIR was distributed to federal, state, regional, and local agencies, key stakeholders, interested parties, neighborhood groups, and NOP commenters, as well as the State CEQA Clearinghouse.

Due to the ongoing public health crisis associated with the COVID-19 pandemic, and the Regional Stay at Home Order issued by the Governor, the Zoo closed to the public on December 7, 2020 for a minimum of three weeks and was reopened based on public health guidance. Therefore, the environmental review process was conducted online. The Draft EIR was made available online and the public meeting occurred virtually.

The Draft EIR was made available for review online at:

<https://eng.lacity.org/los-angeles-zoo-vision-plan>

CEQA requires that a Draft EIR is submitted to the State Clearinghouse for circulation and for a 45-day review and comment period. This provides agencies and the public an

opportunity to review and comment on the adequacy of the analysis and the findings regarding the potential environmental impacts of a proposed Project.

The Draft EIR public review period lasted 60 days from **December 17, 2020 to February 15, 2021**.

All comments were submitted by electronic or postal mail to:

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

A virtual public meeting was held during the public review period to solicit comments from interested parties on the content of the EIR. The meeting was held at the following date and time:

Wednesday, January 13, 2021

5:30 p.m.

The presentation for the virtual public meeting was recorded and made available on-demand from links posted at: <https://eng.lacity.org/los-angeles-zoo-vision-plan>.

The City considered all comments, written and oral, in preparation of the Final EIR. The Final EIR includes all comments received, including a list of commenters, and provides a response to all comments. Written comments were received from 2 state agencies, 2 local agencies, 5 organizations, and 9 individuals. A total of 14 oral testimonies were received from individuals during the virtual public meeting held on January 13, 2021. All comments received during this period are provided and responded to in writing in Section 8, *Response to Comments*, and comments are addressed as needed throughout the Final EIR (see also, Section 1.6, *Revisions to the EIR*).

In addition, the Lead Agency must prepare the Findings of Fact, and, if necessary, a Statement of Overriding Considerations if there are significant impacts that cannot be mitigated to a level below significance, as well as a Mitigation Monitoring and Reporting Program (MMRP) if there are mitigation measures that must be incorporated and adopted. These are the components of a Final EIR.

1.4.3 Review of the Focused Recirculated EIR

Pursuant to the CEQA Guidelines Section 15088.5(f)(3), notice of public review of the Focused Recirculated EIR has been distributed to federal, state, regional, and local agencies, key stakeholders, interested parties, neighborhood groups, NOP commenters, and those agencies, persons, and organizations that commented on the Draft EIR, as well as the State CEQA Clearinghouse. CEQA requires an EIR to be submitted to the State Clearinghouse for circulation and for a 45-day review and comment period. This provides agencies and the

public an opportunity to review and comment on the adequacy of the analysis and the findings regarding the potential environmental impacts.

The Focused Recirculated EIR has been made available for review online at:

<https://eng.lacity.org/los-angeles-zoo-vision-plan>

The Focused Recirculated EIR public review period runs for 45 days from **July 14, 2022 to August 29, 2022**.

All comments must be submitted by electronic or postal mail (please include “**LA Zoo Vision Plan Focused Recirculated EIR Comments**” in the subject line) to:

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

A virtual public meeting will be held during the public review period to solicit comments from interested parties on the content of the Focused Recirculated EIR. The meeting will occur on the following date and time:

Monday, August 15, 2022

6:00 p.m.

The link to join the public meeting is posted here: <https://eng.lacity.org/los-angeles-zoo-vision-plan>

Since the revisions are limited to a few sections of the EIR, only those sections of the EIR are included in the Focused Recirculated EIR. Pursuant to the CEQA Guidelines Section 15088.5(f)(2), the City requests that reviewers limit their comments to the revised portions that are included in this Focused Recirculated EIR as the City need only respond to comments on the portions of the EIR that are being recirculated. The recirculated sections upon which comments will be accepted include Section 1.0, *Introduction*, Section 4.0, *Alternatives*, Appendix O, Appendix P, and Appendix Q, as described above. All comments received during this period related to the revised sections will be responded to in writing in a revised Section 8, *Response to Comments* (see also, Section 1.6, *Revisions to the EIR*).

The Zoo Commission will consider the Final EIR, including the recirculated portions, and make a recommendation to the City Council, as the governing body of the City of Los Angeles, regarding certification of the EIR and adoption of the Vision Plan.

1.5 SCOPE OF THE EIR

This EIR assesses the potential environmental impacts that would occur with the implementation of the proposed Project and its alternatives. The EIR evaluates potentially significant environmental impacts including issues raised in public comments received in

response to the NOP/IS and at public scoping meetings (See Appendix B and C). This scoping process determined that the EIR should analyze the following issues (See Section 3.0, *Environmental Impact Analysis and Mitigation.*):

- Aesthetics
- Biological Resources
- Energy
- Geology & Soils
- Hazards & Hazardous Materials
- Land Use & Planning
- Public Services
- Transportation
- Utilities & Service Systems
- Air Quality
- Cultural & Tribal Cultural Resources
- Urban Forestry Resources
- Greenhouse Gas Emissions
- Hydrology & Water Quality
- Noise and Vibration
- Recreation
- Utilities & Service Systems
- Wildfire

This EIR addresses the issues referenced above and identifies potential environmental impacts associated with the Project, in accordance with the provisions of the State CEQA Guidelines. The EIR identifies feasible mitigation measures where necessary that would reduce or eliminate adverse environmental effects. In accordance with CEQA Guidelines Section 15128 (Effects Not Found to Be Significant), environmental impacts related to Agriculture Resources, Mineral Resources and Population and Housing would be less than significant and therefore are not fully analyzed in this EIR (see Section 5.0, *Other CEQA Considerations* of this EIR).

A summary of cumulative impacts, which considers other projects or plans in the vicinity, is described in Section 3.18, *Cumulative Impacts*. Cumulative project analyses represent a comprehensive assessment of potential impacts on City resources using a list of past, present, and probable future projects capable of producing related or compounded impacts.

Consistent with CEQA Guidelines Section 15126.6(d), this EIR includes an assessment of a reasonable range of alternatives to the Project that could feasibly attain the Project objectives while avoiding or substantially lessening any of the significant effects of the Project. The alternatives analysis includes alternatives that were considered but discarded from further analysis, consideration of a No Project alternative, and three alternatives fully analyzed in accordance with the CEQA Statute and Guidelines. Please refer to Section 4.0, *Alternatives*.

Potential alternatives were developed to identify means other than the proposed Project to attain key Project objectives while lessening or avoiding potentially significant environmental impacts caused by the proposed Project. The proposed Project would result in significant impacts on the environment; accordingly, reduction of significant impacts was a factor considered in the development of alternatives to the Project. This Focused Recirculated EIR includes an analysis of an additional alternative. As discussed further below in Section 1.6.2, *Focused Recirculated EIR*, portions of the EIR were revised following its publication in June

2021 to included consideration and analysis of a new alternative to the proposed Project: the California Focused Conservation Alternative (Alternative 1.5). Together, the EIR analyzes the No Project Alternative, Reduced Project Alternative, California Focused Conservation Alternative, and Multi-modal Transportation Alternative, as summarized below.

- **No Project Alternative.** In accordance with CEQA, the EIR includes a No Project Alternative. Under the No Project Alternative, the Vision Plan would not be adopted, comprehensive Zoo-wide expansion and redevelopment would not occur, and the Zoo would continue to operate as is, with maintenance, repair, and improvement of facilities occurring as needed. Resident Zoo animals would continue to live in some outdated animal spaces. Annual attendance at the Zoo would remain similar to existing visitation at approximately 1.8 million visitors per year.
- **Alternative 1 – Reduced Project Alternative.** Alternative 1 would retain approximately 21 acres of undeveloped area currently within Zoo property in its current setting. In doing so, this alternative would preserve a combination of native and non-native vegetation communities supporting a limited range of sensitive species and protected trees. This alternative would not include the expanded exhibits within the California and Africa planning areas proposed under the Project, which would limit expansion within Zoo property. Further, Alternative 1 would not create an efficient and accessible internal loop circulation system with a Primary Loop Path. With reduced Zoo capacity compared to the Project, total annual attendance anticipated under Alternative 1 would be approximately 2,525,775 persons, a reduction of approximately 15.8 percent compared to the Project.
- **Alternative 1.5 – California Focused Conservation Alternative.** Alternative 1.5 would guide long-term redevelopment and operations of the Zoo similar to the Project but under a shortened timeframe (18 vs. 20 years) and revised land use plan that would avoid the development of approximately 6 acres of an undeveloped hillside within the Africa planning area that supports sensitive biological resources. Instead, Alternative 1.5 would include ongoing restoration of the area to improve its ecosystem health. This alternative would also modify the planned site design, eliminate several improvements (e.g., the parking structure and aerial tram), and implement measures to manage visitation to accommodate 2.5 million visitors per year or 500,000 fewer annual guests than anticipated under the proposed Project.
- **Alternative 2 – Multi-modal Transportation Alternative.** Alternative 2 would substantially expand multi-modal transportation opportunities for the Zoo to give visitors and employees the option to use transit, bicycles, walking, and ridesharing as a viable and attractive travel mode. In doing so, Alternative 2 would substantially reduce total Zoo vehicle miles traveled (VMT) to a greater extent than the proposed Project while including all components of the proposed Project. Annual growth projections would be identical to the Project to reach the Zoo’s goal of 3.0 million visitors per year by Phase 7.

1.6 REVISIONS TO THE EIR

1.6.1 Draft EIR

Changes made to the Draft EIR in response to the public comments are included in the Final EIR published in June 2021. Changes to the Draft EIR include minor corrections made to improve writing clarity, grammar, and consistency, clarifications, additions, or deletions resulting from specific responses to comments, and changes to update information in the Draft EIR. These text revisions are provided in the body text of the EIR. Meaningful corrections, additions, and deletions to the EIR are provided in ~~strikeout~~ and underline, as needed, to indicate an addition or deletion, respectively.

Changes to the text of the Draft EIR are primarily presented in the following sections:

- Section 2.0, *Project Description*
- Section 3.3, *Biological Resources*
- Section 3.6, *Urban Forestry Resources*
- Section 3.12, *Noise and Vibration*
- Section 3.15, *Transportation*
- Section 3.18, *Cumulative Impacts*
- Section 4.0, *Alternatives*

Changes to these sections include minor modifications to the details of the mitigation measures, updated information regarding existing conditions, and updated details of various cumulatively considered projects in the City of Burbank.

New information added to an EIR is not significant unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect that the project's proponent has declined to implement. The minor clarifying revisions described above and presented in the Final EIR would not result in a new significant environmental impact, a substantial increase in the severity of an environmental impact, or a feasible project alternative or mitigation measure that would clearly reduce the significant environmental impacts. These clarifications ensure internal consistency within the EIR and would not substantially change any of its conclusions. Therefore, pursuant to CEQA Guidelines Section 15088.5, the City was not required to recirculate the Draft EIR prior to the publication of the Final EIR in June 2021.

1.6.2 Focused Recirculated EIR

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, urban forestry resources, transportation, and aesthetics. In response to these comments, a new project alternative, Alternative 1.5, the California Focused Conservation Alternative, has been

analyzed in this Focused Recirculated EIR in accordance with CEQA Guidelines Section 15088.5. A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation includes, for example, a disclosure showing that:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3. A feasible project alternative or mitigation measure considerably different from the others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
4. The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

As previously described, the Final EIR has been revised to include consideration of a new feasible alternative to the proposed Project that would attain all of the Project objectives and reduce impacts compared to the proposed Project. These changes to the Final EIR represent "significant new information" under the CEQA Guidelines Section 15088.5(a), and, as such, the City elected to recirculate portions of the EIR so as not to deprive the public of a meaningful opportunity to comment.

The CEQA Guidelines Section 15088.5(c) states the following with respect to the recirculation of an EIR:

If the revision is limited to a few chapters or portions of the EIR, the lead agency need only recirculate the chapters or portions that have been modified.

The City has elected to recirculate those sections of the Final EIR related to revisions to the alternatives analysis and supporting technical memoranda. The Focused Recirculated EIR has been prepared consistent with the standards provided in the CEQA Guidelines Section 15088.5, which set forth the conditions governing the recirculation of an EIR prior to certification. The Focused Recirculated EIR includes only those sections of the EIR that have been revised to analyze the new project alternative – Alternative 1.5. Consistent with the standards provided in the CEQA Guidelines Section 15088.5(g), the specific sections from the Final EIR that have been modified and are included in the Focused Recirculated EIR include:

- Section 1.0, *Introduction* – This section has been modified to describe the Focused Recirculated EIR process and related CEQA requirements.
- Section 4.0, *Alternatives* – This section has been expanded to describe and analyze a new project alternative– Alternative 1.5, the California Focused Conservation Alternative. Additionally, when compared to the proposed Project and among alternatives, the California Focused Conservation Alternative has been identified as the new Environmentally Superior Alternative due to its reduction in impacts related to aesthetics, air quality, biological resources, energy, urban forestry resources, greenhouse gas emissions, noise, transportation, and utilities. Alternative 1.5 would also achieve more of the Project objectives when compared to Alternatives 1 and 2. In addition, a new discussion has been added that provides an analysis of the space dedicated to animal welfare and care under the proposed Project and alternatives.
- Appendix O – *Appendix O, Alternative 1.5 Project Description* – This new appendix contains a detailed description of the new California Focused Conservation Alternative and a copy of the planning document 2022 Zoo Vision Plan – Alternative 1.5.
- Appendix P – *Appendix P, Parking Analysis for Alternative 1.5 of the LA Zoo Vision Plan EIR Memorandum*, is a new appendix to the Final EIR that provides a summary of the analysis of parking demand under the new Alternative 1.5 and informs recommendations for the development of a Peak Visitation Management Program, a key component of Alternative 1.5.
- Appendix Q – *Appendix Q, Comparative Analysis of Area Dedicated to Animal Welfare Under Implementation of the Los Angeles Zoo Vision Plan Project and Environmental Impact Report Alternatives Memorandum*, is a new appendix to the EIR that provides detailed discussion and comparative, Geographic Information Systems (GIS)-based analysis of proposed changes in animal welfare area to support the new discussion presented in Section 4.0, *Alternatives*.

The numbering of chapters in this Focused Recirculated EIR matches that in the previously published Final EIR. Section 1.0 and Section 4.0 replace in their entirety the corresponding sections of the original Final EIR.

1.6.3 Changed Circumstances

Since publishing the Final EIR in June 2021, the following changes in City and State policies and conditions relevant to the Project have occurred. As described below, these changes do not substantially affect the EIR’s setting, impact analysis, mitigation measures, or findings. As such, this information is provided for public information and disclosure as part of the Focused Recirculated EIR.

Water Conservation Emergency declared by the State and Metropolitan Water District of Southern California (MWD)

Following Governor Newsom’s October 19, 2021 proclamation of a drought state of emergency, the State Water Resources Control Board on January 4, 2022 adopted an emergency regulation (Resolution No. 2022-0002). On April 26, 2022, the MWD declared a Water Shortage Emergency for the State Water Project (SWP) dependent areas and executed an Emergency Water Conservation Program (Resolution No. 9305). These water use restrictions will remain in effect for one year from the effective date of the resolutions, unless the resolutions are modified, readopted, or ended. The two resolutions enact the following restrictions:

- Limit outdoor watering to one day per week;
- Turn off decorative water fountains;
- Turn off/pause irrigation systems when it is raining and for two days after rain;
- Use an automatic shutoff nozzle on water hoses;
- Use a broom, not water, to clean sidewalks and driveways;
- Avoid overwatering; and
- Immediately reduce water use by 20 to 30 percent.

Section 3.16, *Utilities* analyzes the impacts of the proposed Projects effects on water supplies, including drought and non-drought conditions. The EIR presents a conservative worst-case scenario for future water demand under the Project compared with the City’s current and estimated total potable water supply. Mitigation was identified to reduce the proposed Project’s and the EIR alternatives’ impacts from increased water demand and align with the goals and measures of the City’s Green New Deal pLAn and One Water L.A. Plan by implementing a range of water conservation strategies and measures. The Zoo is subject to the MWD drought declaration, which would further reduce water demand at the Zoo, and the mitigation measures required to address water supply impacts would be consistent with the declaration. Therefore, the change in circumstances relating to drought conditions following the release of the Final EIR does not impact the findings for the proposed Project or EIR alternatives.

Department of Recreation and Parks (RAP) Urban Forest Program and Tree Preservation Policy

On March 17, 2022, the Board of Recreation and Park Commissioners approved amendments to RAP’s Urban Forest Program and the City’s Tree Preservation Policy to maintain the policies set forth in the City’s Protected Tree Ordinance but transfer required oversight of all permitting approvals from the Board of Public Works to the RAP Board of Commissions. Further, the amended Tree Preservation Policy updated the list of species of trees to include all the trees protected in the Los Angeles Municipal Code, which include Coast live oak (*Quercus agrifolia*), Valley Oak (*Quercus lobata*), Laurel bay tree (*Umbellularia californica*), Western Sycamore (*Platanus racemosa*), Mexican elderberry (*Sambucus Mexicana*),

Southern black walnut (*Juglans californica*), Toyon (*Heteromeles arbutifolia*), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (*Quercus berberidifolia*) with a diameter at breast height (4.5 feet above ground level) of 4 inches.

Section 3.6, *Urban Forestry Resources* analyzed the impacts of the proposed Project's effects on urban forestry resources and Project consistency with RAP's Urban Forest Program and the City's Tree Preservation Policy. Adopted amendments to RAP's Urban Forest Program are primarily administrative in nature and result in a change in the regulatory body providing oversight and permitting authority. Further, the EIR's analysis of impacts on urban forestry resources assesses impacts based on the City's Protected Tree Ordinance (Ordinance No. 177404), which includes all the species listed in the amended Tree Protection Policy. Thus, the change in circumstances relating to recently adopted amendments to RAP's Urban Forest Program and Tree Protection Policy following the release of the Final EIR does not impact the findings for the proposed Project or EIR alternatives.