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Northern Alameda County Group

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Dear Members of the Oakland Planning Commission:

The Sierra Club recently heard from neighbors opposed to the Oakland Zoo's expansion plan calling for construction of a new veterinary facility, gondola ride and enclosed animal compounds in Knowland Park above the zoo. The neighbors who spoke to us presented the opinion that the Oakland zoo's managers appear to be disregarding agreements worked out two years ago in response to the 2008 protests by the community, and have furthermore not addressed many of the original concerns of the community going back to the original 1998 zoo expansion master plan, foremost being that the zoo intends to fence off 56 acres of open space to construct a series of exhibits that will only occupy a portion of that space. The rest of the enclosed space is proposed to sit empty.

We spoke with a representative of the zoo on May 14th, to confirm the acreage numbers and that they plan to fence off this space for the purpose of the expansion. The zoo representative confirmed this and gave us the explanation that the space between the existing zoo and the proposed new exhibits is too steep to build on and that a fence is necessary to promote restoration of the land and keep out animals such as feral cats. Despite these explanations, we agree with the neighbors who are asking why the zoo is fencing off so much acreage, if they are only going to use a portion of it for their exhibits. The Sierra Club believes that public access to open space, whether it be in an urban area or in the Sierra Nevada, is key to the public learning to "explore, enjoy, and protect wild places," which is the mission of the Sierra Club. Putting up fencing around open space in Knowland Park removes the land from public access. It will no longer be "open space."

We also take issue with those who have commented that by building a gondola ride from the zoo up into Knowland Park, that the zoo is "providing public access to open space." In fact, we understand that the public will be asked to pay for this experience, and that the public will only have access to the fenced-in portions of the zoo. This is not the same as "providing access to open space."

Our second major concern next to loss of open space is that the environmental review process to date has been inadequate. This is a large project that will have significant direct impacts and cumulative impacts. CEQA requires that entirely new environmental review analysis and documents be prepared when a substantial amount of time has passed after the initial project proposal and review, and anytime when conditions may have changed substantially, and/or new evidence has come forward that there are potential significant impacts that weren't identified in the original proposal. The Zoo expansion is certainly a case where both of those parameters are in effect, as evidenced by the following:

- 1) It has been approximately 13 years since the original proposal and Mitigated Negative Declaration (the "Initial Study and Environmental Review Checklist" is dated 3/27/1997). That time lag should trigger a whole new, and complete environmental review for a project of this size.
- 2) The proposed expansion - with additional structures, gondola, etc. - will clearly have new traffic impacts (we also note that traffic conditions have changed in Oakland since 1997), as well as potential impacts in a number of other related CEQA areas (e.g. aesthetics, air quality, storm water management, etc.) Again, these need to be fully analyzed.

3) The 1997 expansion plan, including the modifications made in 1998, had a different “footprint” (different fence line as well as different exhibit locations) than what is currently proposed.

In summary, the altered scope of this expansion vis a vis 1998 warrants a full Environmental Impact Review and reconsideration, and it must comply fully with CEQA. We would expect that any new environmental review include an impact study and proposed mitigation measures for the following categories:

- Air Quality
- Biological Impacts
- Transportation
- Water Management / Stormwater Runoff

We are concerned that this appears to be a case where an institution is saying, "because we do good work on species conservation and education, we should be allowed to sprawl into open space to support our good efforts." The Sierra Club believes that this is exactly the type of situation where responsible environmental institutions should adopt an entirely different approach: the zoo could show real leadership on habitat and species protection by committing to further enhance its facilities and programs within its current boundaries, complying with all aspects of CEQA, and educating its visitors about the importance and significance of that decision and commitment. This would garner both positive public relations - thereby enhancing fundraising efforts and public visibility – as well as promoting and implementing a truly sustainable environmental choice for the future. Continuing expansions do not represent a sustainable approach to conservation efforts.

This proposal must be re-evaluated in light of the larger issues of protection of the last remaining open spaces and habitat throughout the south Bay hills area. The Sierra Club continues to have strong reservations about the proposed expansion of the Oakland Zoo. We therefore ask the Oakland City Council and the Planning Commission to require a new EIR before this project moves ahead any further.

Sincerely,

Kent Lewandowski
Chair, Sierra Club Northern Alameda County Group

Cc: Oakland City Council, Mayor's Office