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Northern Alameda County Group

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November 27, 2010

Scott Miller
Managing Supervisor
Planning and Zoning Division
250 Frank Ogawa Plaza, Suite 3315
Oakland, CA 94612

Re: Oakland Zoo Master Plan 2009 Revisions

Dear Scott,

It is our understanding that the draft environmental document regarding the Zoo Master Plan 2009 revisions is scheduled to be released in January 2011. We are further informed that it is anticipated that there will be a 30 day review period to provide feedback on the study, and that the study being prepared by Placemakers (the environmental consultant) is substantive and lengthy. We would like to comment on the content of the study as well as the process for providing input.

The Sierra Club previously submitted a letter to the City, dated May 2, 2010 stating that the altered scope of the zoo's expansion vis a vis the original 1998 proposal warrants a full Environmental Impact Review and that it needs to comply with CEQA. We further stated that the "environmental review" performed in 1998 was inadequate because it did not fully analyze impacts to the plants and animals in the proposed expansion area and did not propose a full spectrum of possible mitigations the way a normal EIR would do.

We expect that whatever document Placemakers is currently preparing will comply with CEQA, will carefully examine the alterations in landscape and biology that have taken place since 1998, and will fully analyze the impacts to plants and animals in a way that the original study failed to do.

We also feel strongly that the approval of the Zoo expansion by the City in 1998 does not mean the new study can be a "mitigated negative declaration" – essentially exempting the City and the Zoo from mitigations based on the 1998 approval. It is our understanding of CEQA that when more than 10 years have elapsed, a completely new study is required. Therefore, **the new study needs to re-examine the impacts to the environment (both natural and non-natural) as if the new expansion had never been approved in the first place.**

Regarding the process for providing input to the study, **we strongly urge the City to extend the public comment period from 30 to 60 days** to allow us to carefully read the study and respond to it. Because the new study is expected to be lengthy, we feel 30 days is not enough time for volunteer-led groups such as ours or others to respond. Also, since the planning for the "new" zoo expansion has been underway for over 2.5 years (the project was first brought to our attention in early 2008), it does not seem that it will hurt the City or the Zoo to wait an extra 30 days to give the public a chance to thoroughly analyze the new environmental study and provide responses.

Sincerely,

Kent Lewandowski
Chair, Northern Alameda Group
Sierra Club, San Francisco Bay Chapter

Cc: Oakland Planning Commission - Eric Angstadt, Planning Director - Darin Ranelletti, Planner III