January 16, 2020

To Essex County Executive Joe DiVincenzo, Jr.,

This letter expresses the concerns of the South Mountain Conservancy Board of Trustees with the expansion plans for the Turtle Back Zoo. Our concerns are twofold: first, the plans for the amphitheater / conservation pavilion, and second, the overall direction and scope of expansion as outlined in the recently published master plan.

The new amphitheater has and continues to be a matter of public debate. While many arguments for and against have been made with respect to the amphitheater, we view the core issue more broadly as how best to manage the overwhelming success of all the attractions at that area of the South Mountain Reservation. The addition of the loop around the Orange Reservoir, the general build-up of the zoo over the last decade, and the addition of commercial enterprises such as McLoone’s, Sahara mini-golf, and the Treetop Adventure Course have put enormous pressure on parking and increased traffic in the area.

In the past, we have supported much of this expansion. When the zoo expanded about a decade ago, we worked with the County to reroute existing South Mountain Reservation hiking trails. We viewed the 11 acres acquired north of Mayapple Hill (the Mandelbaum property) and the 52-acre state-owned parcel incorporated into the reservation as efforts to replace what was appropriated elsewhere. This had benefits for all: the zoo could grow, the Lenape Trail could be extended all the way to Route 10, and the Zoo Loop hiking trail was constructed with Green Acres/Open Space funds. We were supportive of the loop around the Orange Reservoir and appreciative of the entry points that the county added to the trail system. Overall, we are thankful for the partnership between the South Mountain Conservancy and Essex County on the issues and challenges placed on this incredible natural resource and look forward to continuing this partnership.

Nevertheless, as the Board of Trustees of the South Mountain Conservancy debated zoo expansion, we took as our touchstone the Conservancy’s mission as:

… steward and advocate for the 2,110-acre South Mountain Reservation by working to protect, restore and enhance its ecology, natural beauty, and infrastructure through sustainable use, informed public policy, and public education and engagement.

The zoo master plan indicates a desire to develop new exhibits that will potentially boost attendance from the current level of 900,000 annually to 1.2 million. This puts additional pressure on the ecology, natural beauty and infrastructure of the reservation itself by not only enlarging the zoo’s footprint, but the necessary parking. The zoo master plan indicates an increase of around 425 parking spots will be required if attendance reaches 1.2 million annually, or potentially 12,000 attendees on a peak day. The recent completion of the third parking deck has helped, but approximately 3 ½ acres of reservation land has still been taken for overflow “special event” parking on the west side of Cherry Lane near the Oakdale Picnic area. In addition, the overall expansion for the African Adventure exhibits looks to re-purpose at least another five acres beyond the 1 ½ acres for the pavilion. When the zoo was formed in 1963 our understanding is that zoo boundaries were never set. Does that mean that beyond the amphitheater another five acres will be taken in the future? Or possibly ten? We would like to understand what are the limits, if any, of zoo expansion.

In addition to the expanding zoo and parking footprint, the traffic and crowds that the entire area attracts negatively impacts the quality of life in the surrounding communities, especially West Orange. With a 33 percent increase in zoo attendance contemplated, there is a legitimate concern for people who live in the local community as well as for people who are simply trying to quickly pass through the area. A true understanding of how traffic will be affected is needed.

Viewing all these changes collectively, in our view this is too much expansion without further study of the community impact and mitigating the effects on the reservation.
SMC Position on Planned Turtle Back Zoo Expansion

To be clear, we are not against the Turtle Back Zoo. Members of our Board have been or are currently members and enjoy taking our families there. We are glad that the American Zoological Association, the Zoological Association of America and the American Humane Society have accredited it. Their missions, however, also include strengthening animal populations and conservation.

Our specific position and recommendations are that the County:

- Suspend any zoo expansion until a comprehensive and independent traffic study, as recommended by the master plan, with the input from West Orange, demonstrates minimal or manageable impact of current usage and planned growth.
- Provide an estimated cost of the pavilion.
- Tabulate the costs and benefits to the community from the commercial development in the South Mountain Recreational Complex (present and anticipated).
- Commit to increased, ongoing investments for the maintenance of the South Mountain Reservation’s infrastructure and ecology. For infrastructure, compared to efforts of the park’s maintenance staff just a few decades ago, there is minimal attention to the swale and culvert system creating significant groundwater and drainage issues. For ecology, more attention must be focused on the proliferation of invasive species that continue to spread and harm the reservation’s ecosystem.
- Expand the planned 2:1 replacement of trees in any future development. Two 3.5-inch caliper trees for each removed tree represents less than one-fifth of the cross-section of the 135 trees slated for removal for the pavilion. (This is based on a random measurement of 63 of the trees.) Furthermore, since these trees cannot be planted at the zoo site itself, a tree fund should be set up for tree replacement in SMR over the next decade. Planting should be implemented in consultation with the Conservancy as tree plantings from the South Orange Avenue S-curves project severely compromised several open spaces that are critical parts of the Olmsted plan. (Recent news indicates that the County has decided on a 4:1 replacement ration with 3.5” caliper trees, which we commend.)
- The County should sponsor, along with the Conservancy, the creation of an SMR Advisory Committee consisting of ecology experts, as involved in the recent Bio-Blitz. Their role would be to develop recommendations for: (1.) studying and improving the SMR ecosystem for species of concern and general forest health, and (2.) programs focused on habitat restoration by volunteers, citizen scientists, and county initiatives.
- Reduce by one-quarter the size of the special event parking in order to reconstruct the natural amphitheater along Cherry Lane north of the Oakdale Parking area.
- Continue its ongoing commitment to an annual deer control program without which the forest canopy would deteriorate and no improvements would be possible in the ecosystem.
- Follow through on the recommendations of the West Orange Planning Board for a white roof, a 4:1 compensatory planting plan, and the educational rain garden.

Finally, while we think that the County’s announcement of public hearings on the master plan is excellent, the process from the start should have included stakeholders, both West Orange and the Conservancy. That was not the case. Too much money and precious land is at stake for this to have been developed in a vacuum.

We appreciate the attention and funding you have directed toward the Essex County Park System in the past decade. County residents are better for it. That being said, the reservation’s expansive woodlands and amenities provide a special restorative environment for our densely populated county that we feel is in our mission to defend. For this reason, the Board of Trustees respectfully asks that you curtail future expansion of the Turtle Back Zoo in light of the recommendations above.

SMC Board of Trustees