

SANTA MONICA MOUNTAINS CONSERVANCY

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February 27, 2012

Carlos J. Montez, Branch Chief
Division of Environmental Planning
California Department of Transportation, District 7
100 S. Main Street MS-16A
Los Angeles, California 90012

**Comments on US 101/Palo Comado Road Interchange Project IS/EA
EA 25720 – 07-LA-101-PM 33.0/34.4**

Dear Mr. Montez:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments and recommendations on the above-referenced project Initial Study (IS)/Environmental Assessment (EA). The Conservancy's October 15, 2010 and November 4, 2010 comment letters on the project made the case for fencing mitigation measures to benefit cross freeway wildlife movement at the Liberty Canyon Road interchange located to the east and for funding to the National Park Service for continued wildlife movement studies along the 101 Freeway in the subject area. The IS/EA does not include either such mitigation measures.

The IS/EA includes an extensive compilation of cumulative impacts along the subject section of the 101 Freeway. The widening of the whole subject interchange eliminates any potential use of the overpass for cross-freeway wildlife movement and puts added pressure on the Liberty Canyon underpass to serve as the primary inter-mountain range wildlife corridor.

The Conservancy finds the IS/EA to be deficient if it does not include a funding set aside to provide for the immediate future study and potential future modification of the Caltrans right-of-way fencing on the southwest corner of the Liberty Canyon interchange. The current fencing at the edge of the right of way limits the width of land available to animals to move behind an existing commercial building complex to Mountains Recreation and Conservation Authority (MRCA) land between the freeway and Agoura Road. Caltrans has strong requirements to fence the outer edge of freeway rights-of-ways, but those requirements are not absolute. If the Palo Comado interchange is eliminated as a

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secondary wildlife overcrossing, that loss of animal movement capacity combined with the cumulative traffic capacity provided by the subject project provides adequate nexus to require mitigation at the Liberty Canyon interchange.

If regulations absolutely prohibit moving right-of-way fencing as described above, we urge Caltrans to include a mitigation measure to specifically fund the MRCA to plant oak trees and native perennial bunch grass on the properties it owns and manages on either side of the Liberty Canyon interchange. Such planting would specifically not conflict with the proposed location and construction staging needs for a proposed wild/recreation tunnel under the 101 Freeway just west of the interchange. To create enough perennial vegetation to commensurately improve wildlife crossing function at the interchange, the mitigation should pay for the installation of a potable or reclaimed water meter for the MRCA on each side of the freeway and \$30,000 to landscape a critical 0.1 acre on each side of the freeway.

Because vegetation takes a long time to grow to size, the IS/EA must provide the landscaping funding prior to the commencement of construction at the Palo Comado interchange. Or alternatively, the substantial movement of right-of-way fencing as described above.

Please direct all future correspondence to Paul Edelman, Deputy Director of Natural Resources and Planning, at 310-589-3230, ext. 128, edelman@smmc.ca.gov, or at the above letterhead address. Thank you for your consideration.

Sincerely,

ELIZABETH A. CHEADLE
Chairperson