

SANTA MONICA MOUNTAINS CONSERVANCY

RAMIREZ CANYON PARK
5750 RAMIREZ CANYON ROAD
MALIBU, CALIFORNIA 90265
PHONE (310) 589-3200
FAX (310) 589-3207
WWW.SMMC.CA.GOV



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

**Lost Hills Road/US-101 Overcrossing Replacement and Interchange Modification
Project IS/EA 24230 — 07-LA-101-PM**

Dear Mr. Montez:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments and recommendations on the above-referenced project and proposed Mitigated Negative Declaration (MND) and Environmental Assessment (EA). The proposed project will convert an important part of the Santa Monica Mountains Zone into an expanded interchange system. This area abuts the recent 198-acre acquisition by the Mountains Recreation and Conservation Authority (MRCA) now named Zev Yaroslavsky Las Virgenes Highlands Park and includes the west end of the important freeway viewshed on the north side of the freeway between Mureau Road and Lost Hills Road.

The area lost to the interchange circulation system is part of an important habitat interface area where the Simi Hills core habitat abuts the 101 Freeway at the important Las Virgenes Creek undercrossing. The permanent added light, traffic and noise impacts from the proposed project will further diminish the ecological value of abutting land via in direct impacts. Our staff's mapping accuracy could not precisely conclude that grading for the proposed project will not occur on MRCA parkland. The area in question is the eastern most extension of the proposed westbound off-ramp. In any case this portion of the project illustrates how several hundred feet of off-ramp will directly abut parkland. In addition the project would for all intents and purposes eliminate the best stand of coastal sage scrub on that side of the freeway until reaching Liberty Canyon.

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The mitigation measures coarsely address the requirement to replace destroyed oak trees in the subject Biological Study Area. The Conservancy supports this mitigation but urges the final environmental document to provide more specific planting quantities and geographic locations. This agency recommends that the document include a mitigation measure that funds the MRCA to plant and maintain a minimum of 75 oaks on the adjacent terrace owned by the MRCA. An additional mitigation measure should fund the MRCA to plant an additional 250 containerized coastal sage scrub species on same relative portion of the MRCA's property to offset the loss of this habitat type. The species planted could be determined by Caltrans biologists or the MRCA's biologists.

To adequately establish this vegetation, the mitigation funding should pay for the installation of a potable or reclaimed water meter for the MRCA somewhere accessible in a location east of the landfill road. The trees should be planted no closer than an average of 25 feet on center. At this level of spacing, the amount funded to MRCA should be at least \$150,000 an acre, plus the water meter, to cover a five year establishment period. The additional amount funded to MRCA to plant the 250 containerized plants with a five year establishment period should be \$30,000.

The other mitigation requested by the Conservancy is the construction of a low, soft-edged berm along northern edge of the west bound off-ramp to separate the adjacent habitat from the noise, lights, vibration, and glare of cars and trucks. An earthen berm is more permanent, instant, and effective than a vegetated buffer. However if there are permitting and timing issues associated with potential grading on MRCA property, the earthen berm should be done where possible and then transition into an overly dense planting of large, evergreen native vegetation. The MRCA could also be funded to establish and maintain that vegetation. Because vegetation takes a long time to grow to size, the MND/EA must provide the landscaping funding prior to the commencement of any construction at the Lost Hills interchange.

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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