

SANTA MONICA MOUNTAINS CONSERVANCY

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October 23, 2017

Ron Kosinski, Deputy District Director
California Department of Transportation
Division of Environmental Planning
100 South Main Street MS-16A
Los Angeles, California 90012

**Liberty Canyon Crossing Project
Mitigated Negative Declaration - Environmental Assessment Comments
(SCH No. 2017091039)**

Dear Mr. Kosinski:

The Santa Monica Mountains Conservancy (Conservancy) as the principal State planning agency for the Santa Monica Mountains Zone offers the following comments on the proposed Mitigated Negative Declaration/Environmental Assessment for the Liberty Canyon Wildlife Habitat Connectivity Project. The proposed 200-foot-long and 165-foot-wide structure dimensions over the actual freeway are vital to the long-term ecological sustainability of the Santa Monica Mountains and the Simi Hills. The ecological fitness of approximately a billion dollars worth of public parkland in the Santa Monica Mountains is at stake with the outcome of this project.

As a participant in the project location and conceptual design process, the Conservancy can attest to the thorough and extensive analysis that produced the proposed project Alternatives. The Conservancy urges the California Department to Transportation to select Build Alternative 2 as its preferred project. Because Build Alternative 1 would not provide an overcrossing to span Agoura Road, it would be dramatically less effective for the full spectrum of wildlife movement than either of the two Build Alternative 2 design options.

Build Alternative 2 has additional benefits beyond completely spanning over the dangers and distractions of Agoura Road. The animal travel slopes up to the freeway overcrossing will be substantially less steep. In addition those slopes will have much more surface area. More surface area equates to a wider approach and exit configuration to suit more animals needs ranging from avoiding predators to micro-habitat conditions for birds and herpetofauna.

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The proposed Mitigated Negative Declaration/Environmental Assessment addresses that a multi-use dirt trail is an option over the freeway crossing structure. The document clearly states that if a public trail is provided that human use and associated adverse impacts must be rigorously studied. If such use is shown to deter wildlife movement, the use of such a trail must be reevaluated. The two potential trail connections on either side of the freeway are not currently high volume use trails greatly for topographic reasons. The upper portion of the shadeless trail on the north side of the freeway just north of the Liberty Canyon Road interchange is not an official trail and has more attractive access from the Cheeseboro Canyon side. It too can be reached from the dirt road on Mountains Recreation and Conservation Authority (MRCA) land that begins just north of the freeway interchange. The nearby trail on the south side of Agoura Road is steep, shadeless, and infrequently used.

The MRCA controls all of the immediately adjacent lands. To the Conservancy's knowledge the MRCA would never allow any recreational activity that resulted in a substantial negative impact to the efficacy of the proposed wildlife overcrossing. To the extent that science and study show on an updated basis that daytime foot, bicycle, and horse traffic on a dirt trail skirted to one edge of the overcrossing are not having any such negative impact, the Conservancy does not have an issue with providing and testing such a trail at some juncture. In this case, the specifically defined needs of all forms of wildlife must come before human recreational desires.

Please address any questions and send all correspondence to Paul Edelman, Deputy Director, at the above letterhead address.

Sincerely,

IRMA MUÑOZ
Chairperson