

National Park Service
Liberty Canyon Crossing EIR

Page 2

both sides that connects to Malibu Creek State Park and the rest of the Santa Monica Mountains to the south, and to National Park and MRCA lands in the core part of the Simi Hills to the north.

Comments on Types and Specifications of Wildlife Crossings

Both underpasses and overpasses can be effective for wildlife to get across roads. From a wildlife perspective, the best option in the West Liberty Canyon area is a wide, vegetated, wildlife overpass. Although underpasses can also work for many species, their effectiveness is heavily dependent on the openness of the structure (height x weight/length). According to Caltrans staff, the largest culvert that can be put under the 101 Freeway by tunnel-jacking is 13x13, which at 13x13x300 ft. long would be long and dark with low openness, and therefore not be effective for many species including mule deer. A bigger tunnel that would provide connectivity for more species, such as 32 ft. wide by 15 ft. high tunnel, would apparently require cut and cover construction, which means shutting down the 101 Freeway, which is not considered feasible. Two other disadvantages of tunnels is that they could not be vegetated to provide natural habitat, particularly for smaller species, and the tunnels would go only across the 101 Freeway, and not across adjacent Agoura Road.

A wildlife overpass over both the 101 Freeway and Agoura Road would be ideal because it would provide maximum connectivity for the full range of wildlife species, including carnivores such as mountain lions, bobcats, and coyotes, but also mule deer and smaller species such as small mammals, reptiles, and amphibians that are often unwilling to cross even small roads. A wide overpass is needed to provide effective connectivity for a range of wildlife. The 165 ft. planned for the wildlife overpass is at the low end of what is recommended for wildlife overpasses; according to The Federal Highway Administration's Wildlife Crossing Structure Handbook (Clevenger and Huijser 2011), the recommended width is 165-230 ft. and the minimum width is 130-165 ft. For a landscape bridge, which we hope this structure will act as, the recommendation is actually 330 ft. wide or more, and 230 ft. is the minimum. So 165 ft. constitutes a minimum width for effective connectivity, especially given that no structures have been built over such a wide freeway to date.

Comments on Features for Overpass and Surrounding Area

For maximum effectiveness, particularly for a wide array of species, the overpass should be covered with soil and planted with native vegetation, specifically chaparral and coastal sage scrub plants such as are present in natural areas nearby. Sound walls along the crossing would reduce the disturbance from noise and light from the traffic below. Wildlife fencing would also be installed to funnel animals to the crossing and to prevent them from accessing the freeway surface.

The NPS provides comments on the effects of private and public land development in the Santa Monica Mountains at the invitation of state and local units of government with authority to prevent or minimize adverse uses. Thank you for the opportunity to comment. If you have questions, please call Seth Riley at (805) 370-2358.

Sincerely,



David Szymanski
Superintendent

October 26, 2017

October 26, 2017

Ronald Kosinski
Division of Environment Planning
Dept. Transportation, Div 7

Sir:

After reading the Liberty Canyon Wildlife Crossing Report I was somewhat surprised that wildland fire was not part of the environmental evaluation. As a specialist in wildland fire behavior, I can assure you that there is substantial risk to lives and property, within the Santa Monica Mountains from wildland fire, if mitigations steps are not taken.

This particular fire corridor has been under attack many times in the past. The 143,740 acre giant Clampitt/Wright fire on August 25 1970 being the most noteworthy. (Exhibit A) Using USFS fire modeling techniques to demonstrate the current situation (exhibit B) it is not possible for surface fire to spread from the Simi Hills into the Santa Monica Mountains, offering a significant level of protection from fire crossing the 101 freeway. The proposed wildlife crossing will radically alter the status quo, (Exhibit C)

CEQA requires that any project having "potentially significant effects" on the environment shall have an environmental impact report. This project will "expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands". The evident clearly shows that this project meets or exceeds the "CEQA Significance Criteria" test and therefore requires an EIR relative to wildland fire.

Furthermore, this analysis should recommend a plant pallet that will mitigate the fire spread risk and recommend fire protection techniques that will eliminate the risk of fire crossing the 101 freeway at this location.

My position is not in opposition to this project, I support it, I just believe the necessary analysis must be undertaken to ensure that the residents of the Santa Monica Mountains are not open to unnecessary risk from wildland fire.

Anthony Shafer
Malibu, California
310-456-5300

AS-1

Thank you for your comment. Your support for the proposed project is acknowledged.

Steps will be taken for avoidance and minimization of fire hazards with respect to the Liberty Canyon overcrossing. Caltrans will consult with Cal Fire and CDFW on fire safety.

Caltrans will work with the California Department of Fish and Wildlife (CDFW), the California Native Plant Society, United States Fish and Wildlife, the National Park Service (NPS), Cal Fire, and the Mountains Recreation and Conservation Authority (MRCA) to select plant species and plant fire-resistant vegetation that are native to the area.

Such plants may include: California Fuchsia (*Epilobium canum*), Sage (*Salvia* spp.), French Lavender (*Lavandula stoechas*), Tickseed (*Coreopsis* spp.), Red Monkey Flower (*Diplacus puniceus*), California Lilac (*Ceanothus* spp.), California red bud (*Cercis occidentalis*), California Buckwheat (*Eriogonum fasciculatum*), Lemonade berry (*Rhus integrifolia*), Oak species (*Quercus* spp.), Ash (*Fraxinus* spp.), Manzanita (*Arctostaphylos* spp.), Woolly Blue Curl (*Trichostema lanatum*), Catalina Cherry (*Prunus ilicifolia*), Yucca species, and all other vegetation recommended by the Forestry Division of the Los Angeles County Fire Department.

Additionally, invasive and noxious weed control will be implemented by Caltrans and MRCA.



Exhibit A

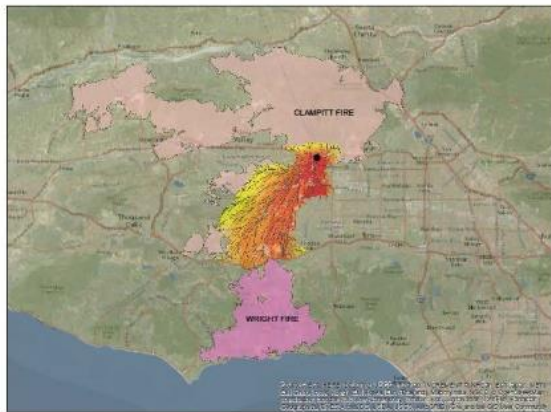


Exhibit B

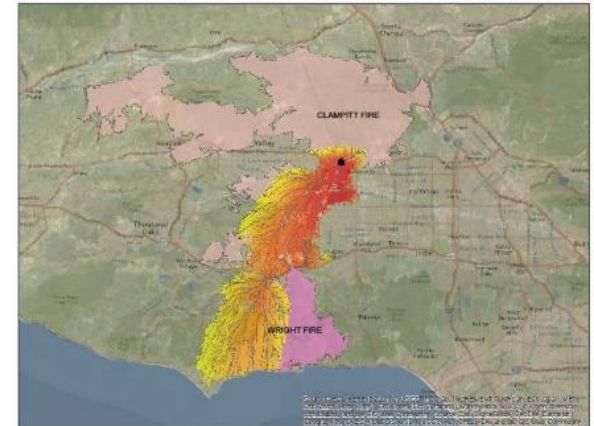


Exhibit C



**BOARD OF SUPERVISORS
COUNTY OF VENTURA**
625 WEST HILLCREST DRIVE, THOUSAND OAKS, CA 91360

MEMBERS OF THE BOARD
JOHN C. ZARAGOZA
Chair
STEVE BENNETT
LINDA PARKS
KELLY LONG
PETER C. FOY

LINDA PARKS
SUPERVISOR, SECOND DISTRICT
(805) 214-2510
FAX: (805) 480-0585
E-mail: Linda.Parks@ventura.org

October 26, 2017

Ronald Kosinski
Deputy Director, Division of Environmental Planning
California Department of Transportation
District 7, Division of Environmental Planning
100 S. Main Street, MS-16A
Los Angeles, CA 90012

Re: Liberty Canyon Wildlife Crossing Project Initial Study with Proposed Mitigated Negative Declaration/ Environmental Assessment

Dear Mr. Kosinski,

The habitat linkage between the Santa Monica Mountains and the Simi Hills is of vital importance to maintaining the genetic integrity and population stability of wildlife in the region. The 101 Freeway bisects and fragments wildlife habitat, but a dedicated crossing at Liberty Canyon would provide critical passage between the Simi Hills and the Santa Monica Mountains. Such a wildlife crossing would be a key step forward to sustain our local mountain lion population.

The Liberty Canyon Wildlife Habitat Connectivity Project would provide a critically important linkage for wildlife by seamlessly connecting open space parkland on both sides of the 101 Freeway. It would help protect the ongoing health of the Santa Monica Mountains ecosystem and preserve native wildlife for future generations.

As we all know, wildlife movement does not stop at county borders, and a wildlife bridge over the 101 Freeway at Liberty Canyon in Los Angeles County will enhance the viability of wildlife in neighboring Ventura County too. To protect the health of Ventura County's natural resources, we are developing new zoning to preserve existing habitat connectivity and wildlife movement corridors. The wildlife bridge at Liberty Canyon would complement our wildlife corridor zoning and make it more effective. The proposed wildlife bridge is an essential aspect to protecting wildlife diversity in both Los Angeles and Ventura County natural open spaces.

Several of the boards on which I sit, including the Santa Monica Mountains Conservancy, the Southern California Association of Governments, and the Ventura County Board of Supervisors, have voted in support of the Liberty Canyon wildlife bridge. I am confident the completion of



BSCV-1

Thank you for your comment. Your support for the proposed project is acknowledged, and your comments are noted.

October 26, 2017

Page 2 of 2

the bridge will lead the way to future wildlife bridges and help reverse disturbing trends of endangerment and extinction of critical species.

A Liberty Canyon wildlife crossing would not only help to maintain and protect healthy wildlife populations, it would also enhance motorist safety on the 101 Freeway by avoiding dangerous collisions with animals that are common there.

One consideration that should also be recognized as a benefit of the project is the tourist attraction of what may become the largest wildlife bridge in the nation, if not the world. Please consider the overriding economic benefits and how ecotourism revenue can help the local economy.

The Santa Monica Mountains National Recreation Area hosts 35 million annual visitors, making the Santa Monica Mountains area among the most visited federal parklands in the nation.

<https://www.nps.gov/samo/learn/news/new-santa-monica-mountains-visitor-center-opens.htm>
http://www.topangamesseenger.com/story_detail.php?ArticleID=5081

The National Park Service reported that 633,000 visitors to the SMMNRA spent \$26 million in communities near the park in 2013, supporting 332 local jobs.

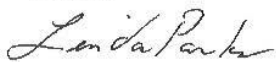
http://www.malibutimes.com/news/article_4f3c2bd8-12aa-11e4-a58a-0019bb2963f4.html

In 2016, 42 million park visitors spent an estimated \$2 billion in local gateway regions while visiting NPS lands in California. These expenditures supported a total of 289,000 jobs, \$1.1 billion in labor income, \$1.8 billion in value added, and \$2.9 billion in economic output in the California economy.

<https://www.nps.gov/subjects/socialscience/vse.htm?state=California>

Thank you for your consideration.

Sincerely,



Linda Parks
Ventura County Supervisor, 2nd District



Memorandum

County of Ventura • Resource Management Agency • Planning Division
 800 S. Victoria Avenue, Ventura, CA 93009-1740 • (805) 654-2478 • ventura.org/rma/planning

DATE: October 26, 2017

TO: Ronald Kosinski, Deputy Director, Division of Environmental Planning,
Caltrans

FROM: Ventura County Planning Division

SUBJECT: Notice of Availability of a Draft Initial Study/Proposed Mitigated Negative Declaration Environmental Assessment (EA) for the Liberty Canyon Wildlife Habitat Connectivity Project

The Ventura County Planning Division has reviewed the California Department of Transportation's (Caltrans) Initial Study Proposed Mitigated Negative Declaration and Environmental Assessment (MND/EA) for the Liberty Canyon Wildlife Habitat Connectivity Project. The project lies solely within Los Angeles County and the City of Agoura Hills; however, project-related impacts on biological resources within neighboring cities and counties can indirectly affect the biological resources in Ventura County.

The Planning Division would like to offer its support for the Proposed Project's Alternative 2 which provides wildlife safe passage over both U.S. Route 101 and Agoura Road, and provides a regional benefit to habitat connectivity and wildlife movement. The Ventura County General Plan's Goals, Policies, and Programs recognizes wildlife migration corridors as significant biological resources¹. In addition, the wildlife linkages mapped as part of the South Coast Missing Linkages Project² were adopted into the County's CEQA Thresholds, and potential impacts to these wildlife corridors are evaluated for all discretionary projects. The proposed Liberty Canyon overcrossing at U.S. Route 101 represents a critical link within these mapped wildlife linkages, and serves as a fundamental connection among large core habitats in the Santa Monica Mountains, habitats in Ventura County, and beyond. This project is also consistent with the efforts Ventura County is making in developing its own Habitat Connectivity and Wildlife Corridor Project.

¹ Ventura County General Plan Goal 1.5.1

² South Coast Wildlands, 2006. A Linkage Design for the Santa Monica-Sierra Madre Connection. Found here: http://www.scwildlands.org/reports/SCML_SantaMonica_SierraMadre.pdf

CVRMAPD-1

Thank you for your comment. Your support for the proposed project is acknowledged.

Thank you for the opportunity to comment on the MND/EA for the Liberty Canyon Wildlife Habitat Connectivity Project. If you have questions regarding the information set forth in this memo, please contact Whitney Wilkinson at 805-654-2462 or Whitney.Wilkinson@ventura.org.



October 26, 2017

Ron Kosinski, Deputy Director
California Department of Transportation, Division of Environmental Planning
100 S. Main Street, MS 16A
Los Angeles, CA 90012

RE: Public Comment on wildlife crossing at Liberty Canyon

Dear Mr. Kosinski,

I am writing on behalf of the National Wildlife Federation to express our support for the construction of a wildlife crossing at Liberty Canyon. The National Wildlife Federation is one of the oldest and largest wildlife conservation groups in the country, with 6 million supporters nationwide. Our organization provides a voice for wildlife, and is dedicated to protecting wildlife and habitat, and inspiring future generations of conservationists.

Conserving large landscapes and wildlife corridors, restoring ecosystems, protecting threatened species, and increasing climate change resiliency are top priorities for the organization—and the wildlife crossing at Liberty Canyon addresses all of these issues, as evidenced by research and reports by the National Park Service (NPS), Caltrans, California Department of Fish and Wildlife, and others. Additionally, one of California's iconic species, mountain lions, are at risk of disappearing from the Santa Monica Mountains and are running out of time. Since 2002, the NPS has been conducting a study in and around Santa Monica Mountains National Recreation Area, and concluded the biggest threat to lion persistence in the Santa Monica Mountains is the loss and fragmentation of habitat by roads and urban development. A recent study by NPS researchers showed likely extinction of the local lion population within 50 years if a solution is not found.

For all these reasons, the Federation supports the construction of the wildlife crossing at Liberty Canyon, and more specifically, supports the selection of Alternative 2 that extends over Agoura Road as this alternative provides the maximize the benefit to wildlife and the ecosystem as whole.

Thank you for you consideration.

Sincerely,

Beth Pratt-Bergstrom
California Regional Executive Director, National Wildlife Federation
prattb@nwf.org (209) 620-6271

NWF-1

Thank you for your comment and for participating in the environmental process. Your support for the proposed project is acknowledged, and your comments are noted.



Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead



Richard J. Bruckner
Director

October 26, 2017

Mr. Ron Kosinski
Deputy Director, Division of Environmental Planning
California Department of Transportation

[Via e-mail: liberty.canyon@dot.ca.gov]

Dear Mr. Kosinski:

**COMMENTS ON THE PROPOSED MITIGATED NEGATIVE
DECLARATION/ENVIRONMENTAL ASSESSMENT FOR
LIBERTY CANYON WILDLIFE CROSSING**

The Los Angeles County Department of Regional Planning (DRP) is interested in providing comments regarding the Liberty Canyon Wildlife Crossing. The project proposed is to build a wildlife crossing across U.S. Route 101 just west of Liberty Canyon Road in the City of Agoura Hills in Los Angeles County.

The County supports this project and believes that it will result in a tremendous improvement for wildlife in the region; however, we have some concerns with the depth of analysis and potential for deferral of mitigation on several of the potential impact issues. Impact quantification and mitigation for several potential impacts is deferred to the construction/implementation phase, after the project has been approved (e.g., a full tree inventory, avoidance and minimization measures for rare plants), and other provisions are not completely explained (e.g., what to do with salvaged silvery legless lizard, what to do with western pond turtles and coast horned lizards in the event they are discovered during pre-construction surveys). These potential mitigation scenarios could easily be fleshed out conceptually in order to provide a reasonable expectation of the scope of efforts that will be required in the event that sensitive resources are encountered, and mitigation measures should be revised to clarify the concepts and methodologies that will be used.

Specific comments:

- **Silvery legless lizard (p 178):** avoidance and minimization measures appropriately suggest revegetation and minimal soil compaction, but this species requires very loose soils and duff and any soil compaction is likely to frustrate future use of restored areas by the species. Additional provisions are recommended for the application of loose sand and duff in strategic areas where it may continue to accumulate over time, thus providing a reasonable expectation of prolonged use of the site.

320 West Temple Street • Los Angeles, CA 90012 • 213-974-6411 • Fax: 213-626-0434 • TDD: 213-617-2292

LADRP-1

Thank you for your comment and for participating in the environmental process. Your support for the proposed project is acknowledged, and your comments are noted. Specific comments are addressed in the following responses.

LADRP-2 (Silvery legless lizard)

Habitat temporarily impacted by the proposed project shall be restored to its original condition. Landscaping for the proposed project shall utilize native and non-invasive plant species. Additional provisions will be put in place for the application of loose sand and duff in strategic areas where it may continue to accumulate over time, thus providing a reasonable expectation of prolonged use of the site. The soil shall be compacted to a point necessary for construction purposes. This will allow any natural occurring individuals within the immediate vicinity to re-populate the temporary impact zone. According to a study (Kuhnz, 2000), soil compaction readings in the field indicated that Silvery legless lizard (*Anniella pulchra*) can burrow in relatively compact sand. They have been found burrowing under sand, grass, and bushes at various depths between 8 cm and 15 cm and at various levels of compaction (psi) from 0-160, though they prefer low compaction. They were mostly found between 40 and 80 psi in bushes as well as grass, but were found between 80-120 psi in 15 cm of sand. Lizards tended to select the outer perimeter of the canopy of bushes. More of the lizards found

under bushes were located at the drip line and low soil compaction readings at these areas indicated a large number of burrows. Shallow depressions accumulated and held soil moisture, forming preferred microhabitats for legless lizards. Milliken et al. (1999) characterized the major soil type within the lizard recovery area as fine-grained, loosely compacted, loamy sand. Abundance was greater in quality habitat (e.g. near yellow lupine bushes) and with greater soil moisture, but lower in disturbed soils. Oak woodland and riparian scrub habitats on site also provide suitable habitat, and will be considered in the analysis.

If areas of high-density silvery legless lizard occurrences are found, salvage efforts can be made by careful removal of shrubs with clam-shell loaders and searching for individuals at the base of the shrub or within the root system as this is a more likely place for them to occur. Surveys for legless lizards and horned lizards shall include raking of leaf litter and sand under shrub and trees in suitable habitat within the disturbance footprint to a minimum depth of eight inches. Captured animals shall be placed into containers with sand or moist paper towels and released in the designated areas within three hours (areas will be determined in coordination with CDFW). In addition to preconstruction surveys, the biologist shall be on-site during initial grading activities to relocate any silvery legless lizards that are unearthed during excavation. If in good health, they shall be immediately relocated to the designated relocation area. If injured, the animals shall be turned over to a CDFW-approved specialist until they are in a condition suitable for release into the designated release area, or deposited at an approved vertebrate museum. During capture and relocation, a monitoring report shall be submitted by the biologist to CDFW.

Mr. Ron Kosinski
October 26, 2017
Page 2

- **Burrowing owl (p 179):** County recommends that methods of burrowing owl surveys follow current (2012) CDFW guidelines for the species.
- **California leaf-nosed bat (p 180 – 181):** avoidance and mitigation measures do not include provisions for how to replace lost roosting opportunities that may result from project implementation. If colony or roost sites are removed by the project, this is a permanent impact, and the County recommends they be replaced. Appropriate bridge design could incorporate roost-friendly features and it is recommended that they be considered.
- **Gertch’s socalchemmis spider (p 182):** The County recommends inclusion of a stop work provision in the event that this species is detected within the construction impact area.
- **Western spadefoot (p 182 – 183):** Soil dressing treatments may be needed in addition to minimization of compaction, similar to those recommended for silvery legless lizard, in order to make the site useable for western spadefoot. In the absence of any evidence of breeding ponds, the utility of the site for western spadefoot is most likely limited to aestivation habitat in upland areas. County recommends a reconnaissance of adjacent areas for the presence of potential breeding habitat. If any breeding habitat is found, that would increase the potential of the project site to provide aestivation opportunities. If no breeding habitat is found, this likelihood is consequently reduced. Avoidance and minimization measures should address aestivation habitat and salvage of toads from potential aestivation sites (rodent burrows, etc.).
- **San Diego desert woodrat (p 183):** County recommends specifying trapping surveys, rather than “nocturnal” surveys for woodrats. The removal technique described for middens is suitable for big-eared woodrat (*Neotoma macrotis*) which typically constructs its middens on the ground at the base of trees and large shrubs, but desert woodrat often constructs middens within cactus or rocky substrate when they are available, which may not be as accommodating for this approach. Some amount of manual dismantling of middens may therefore be required for this provision to be successful.
- **California leaf-nosed bat (p 187):** the mitigation/avoidance measures proposed do not address the potential loss of roost sites, which would be a permanent impact. County recommends incorporation of bat-friendly design that could accommodate roosts in the structure of the overpass.
- **Rufous-crowned sparrow and coast horned lizard (p 185 and 187):** these two discussions contradict each other with regard to coastal sage scrub impacts. The rufous-crowned sparrow discussion states that the proposed project would impact a relatively small amount of chaparral habitat and **no coastal or desert scrub habitat**, while the coast horned lizard discussion states “the proposed project would impact a **relatively small amount of natural coastal scrub habitats**”.

LADRP-2 (Burrowing owl)

The methods of burrowing owl surveys will follow current (2012) CDFW guidelines for the species.

LADRP-3 (California leaf-nosed bat)

Caltrans will coordinate with CDFW throughout the life of the project, as well as conduct pre-project baseline population studies and post-project monitoring. Although California leaf-nosed bats use bridges rarely and caves/mines frequently, roost-friendly features for the overcrossing will be considered during the design phase of the project. Mitigation strategies per the “California Bat Mitigation Techniques, Solutions, and Effectiveness Report” (Johnston, 2004), will be considered as well. If bats are present, Caltrans will focus on avoidance first; if avoidance is not possible, then impacts will be minimized. Replacement will only be used as a last resort and will be species-specific.

Please see the Avoidance, Minimization, and Mitigation Strategies to be used with regards to bat roosting.

LADRP-4 (Gertch’s socalchemmis spider)

A stop work provision will be included in the event that this species is detected within the construction impact area.

LADRP-5 (Western spadefoot)

Spadefoot toads are primarily terrestrial, and require upland habitats for feeding and for constructing burrows for their long dry-season dormancy.

Individuals may remain in these burrows for 8 to 9 months. They emerge late winter early spring. Spadefoot toads appear to construct burrows in soils that are relatively sandy and friable as these soil attributes facilitate both digging and water absorption (Ruibal et al. 1969). Typical of amphibians, wetland habitats are required for reproduction. Western spadefoot toad eggs and larvae have been observed in a variety of permanent and temporary wetlands including rivers, creeks, pools in intermittent streams, vernal pools, and temporary rain pools, indicating a degree of ecological plasticity (U.S. Fish and Wildlife Service, 2005). Little is known regarding the distance that western spadefoot toads may range from aquatic resources for dispersal and aestivation; however, current research on amphibian conservation suggests that average habitat utilization falls within 368 meters (1,207 feet) of aquatic habitats (Semlitsch and Brodie 2003).

Reconnaissance of adjacent areas for the presence of potential breeding habitat (burrows, breeding pools, etc.) will take place during the known breeding season (late winter to early spring) for this project. If potential breeding habitat is found, that would increase the potential of the project site to provide aestivation opportunities for western spadefoot, and focused surveys will be performed as a result.

If western spadefoot are found near the project area, avoidance and minimization measures will address aestivation habitat and salvage of toads from potential aestivation sites (rodent burrows, etc.). Potential indirect impacts to western spadefoot toad habitat located within the 250-foot buffer zones around the project will be avoided or minimized through implementation of conservation and minimization measures, and BMPs. Where possible, habitat corridors between breeding sites will be protected and maintained.

To minimize direct impacts to individual western spadefoot toads, any individuals within the project site and buffer zone shall be relocated outside of the project area. Any egg masses and/or tadpoles discovered within the subject area should be collected, with the permission of CDFW, such that they can be maintained at an appropriate rearing facility for possible relocation of the animals to approved mitigation areas. Any such relocation or other potential mitigation would require approval from CDFW. Spadefoot relocation with Santa Monica Mountains Conservancy will be considered as an option for mitigation. Relocation may also be possible with Rancho Simi Recreation and Park District in Runkle Canyon via their Spadefoot Relocation/Conservation and Vernal Pool Recovery Plan.

LADRP-6 (San Diego desert woodrat)

Liberty Canyon Wildlife Habitat Connectivity Project

A qualified biologist shall conduct a pre-construction survey between 30-60 days prior to any surface disturbing actions to identify potential San Diego desert woodrat middens within the proposed project work areas, and within 50 feet of the edge of the work areas, in order to avoid direct take of woodrats. Woodrat houses found within the work site or within 50 feet from a work site shall be identified and their locations mapped and flagged or fenced for avoidance during construction activities. Safety and/or silt fencing will be erected around all middens (with an opening for the woodrat to escape) within 25 feet of the grading and construction activities to avoid impacts during site work.

If impacts to a woodrat midden located within a work site are unavoidable (within 5 feet of a midden), with the approval of CDFW, a qualified biologist, prior to construction and outside of breeding season (April through June), shall dismantle the midden by hand, removing the materials layer by layer to allow for adult woodrats to escape. One artificial midden shall be built for every one existing inactive midden that is dismantled.

If young are present and found during the disassembling process, a qualified biologist shall leave the site for at least 24 hours to allow for the rats to relocate their young on their own. This step shall be repeated as needed until the young have been relocated by the parent woodrats. Once the nest is vacant, the disassembly process shall be completed and the nest sticks shall be collected and

moved to another suitable close-by location to allow for nest reconstruction. Piles of cut vegetation/slash shall be retained near the work site prior to nest dismantling, to provide refuge for woodrats that may be become displaced (Lee and Tietje 2005).

If a woodrat is observed, the midden appears active trapping surveys will take place, rather than “nocturnal” surveys for woodrats. The process will go as follows: 1) Trap the occupant(s) of the midden; 2) dismantle the midden (for middens that are located within cactus or rocky substrate, manual dismantling will take place); 3) construct a new artificial midden with the materials from the dismantled midden; and 4) release the occupant into the new artificial midden, subject to CDFW approval.

Mr. Ron Kosinski
 October 26, 2017
 Page 3

Other discussions may also contribute to this inconsistency. Please review and revise where necessary.

- **Gertsch's Socalchemmis spider (p 187):** The mitigation proposed for this species is preservation of similar habitats in the region. However, this species is poorly understood and presumably very rare. In all likelihood it is rarer than what is characterized as suitable habitat ("scrub"); therefore, there is little assurance that preservation of scrub habitats in the region would contribute to conservation of the species unless those habitats can be shown conclusively to support the species.
- **Silvery legless lizard (p 189):** the discussion implies that chaparral is the only suitable habitat for this species that is to be impacted by the proposed project. However, oak woodland and riparian scrub habitats on site also provide suitable habitat, and should be considered in the analysis.
- **CDFW jurisdictional areas (p 204 – 205):** The section acknowledges USACE jurisdiction within the work area but does not acknowledge CDFW jurisdiction. Repeat or refer to the discussion of CDFW permitting requirements from p 141 in the discussion of impact (b).
- **Local policies and ordinances (p 205):** Please clarify if oak trees are present within unincorporated County areas of the proposed project footprint; acknowledge that the site is within the County's Santa Monica Mountains / Simi Hills Significant Ecological Area (SEA), and provide clarification that the proposed project is consistent with County policies and ordinances regarding these resources. It might be important to know that the County is in the process of updating the Santa Monica Mountains North Area Plan and to coordinate with the County as needed.

If you have any questions regarding these comments, please contact me at (213) 974-6461, or by email at phachiya@planning.lacounty.gov.

Sincerely,



Patricia L. Hachiya, AICP
 Supervising Regional Planner
 Environmental Planning and Sustainability Section
 Advance Planning Division

PLH

The new midden shall be placed no more than 20 feet from its original location and as far from the project footprint as necessary to be protected from excavation, grading, and construction activities. In the event that trapping has occurred for three consecutive nights and no woodrats have been captured, the midden will be dismantled and a new house constructed. Middens shall only be moved in the early morning during the non-breeding season (October through February).

LADRP-7 (California leaf-nosed bat)

Please see LADRP-3 for response.

LADRP-8 (Rufous-crowned sparrow and coast horned lizard)

The rufous-crowned sparrow discussion states that the proposed project would impact a "relatively small amount of chaparral habitat and no coastal or desert scrub habitat," but it should have stated the project would impact a "relatively small amount of chaparral habitat and no coastal dunes or desert scrub habitat," instead. To clarify, coastal scrub habitat will be impacted as well as chaparral habitat, but coastal dunes will not be impacted. Revisions in the Final Environmental Document will be made to reflect this.

LADRP-8 (Gertsch's Socalchemmis spider)

Please see LADRP-4 for response.

LADRP-9 (Silvery legless lizard)

Please see LADRP-2 for response.

LADRP-10 (CDFW jurisdictional areas)

The following text will be included in the Final Environmental Document within the CEQA Evaluation for Biological Resources: Approximately 0.74 acres of CDFW jurisdiction occurs in the study areas (Waters of the State). The project will also result in impacts to waters under the jurisdiction of CDFW that consist of riverine and drainage courses. A 1602 Streambed Alteration Agreement will be required for both drainages.

LADRP-11 (Local policies and ordinances)

There are oak trees present within the unincorporated County areas of the proposed project footprint; however, the bulk of the oak trees are within the jurisdiction of the City of Agoura Hills. Also, the Biological Resources discussion in section 3.1 CEQA Environmental Checklist has been revised to include information on the County of Los Angeles Santa Monica Mountains/ Simi Hills Significant Ecological Area.

Citations:

Crawford, Dave. "Results of the Focused Western Spadefoot Toad Surveys on the Mission Village Project Site: Unincorporated Los Angeles, California." *Prepared for Newhall Land Company by Compliance Compliance Biology, Inc.* (2006).

Funderburg, John, and Trevor Macenski. "Mitigation Monitoring and Reporting Program for the KRC Aggregates Quarry Expansion: San Joaquin County, California." *Prepared for San Joaquin County Community Development Department, Sacramento, California* (2013).

Johnston, Dave, Greg Tatarian, and E. Pierson. "California bat mitigation, techniques, solutions and effectiveness." *Prepared for the California Department of Transportation and California State University Sacramento Foundation, Sacramento, California* (2004).

Kuhn, Linda. (2000). Microhabitats and home range of the California legless lizard using biotelemetry. Master's Theses.

Lee, D. E. and Tietje, W. D. (2005), Dusky-Footed Woodrat Demography and Prescribed Fire in a California Oak Woodland. *The Journal of Wildlife Management*, 69: 1211–1220.

Los Angeles County Department of Regional Planning. (2009). Significant Ecological Areas. Retrieved May 2017 from http://planning.lacounty.gov/sea/regional_habitat_linkages_and_wildlife_corridors/

Milliken R., et al. 1999. The Moss Landing hill site. A technical report on archaeological studies at CA-MNT-234. Far Western Anthropological research Group, Inc. Davis, California. USA. Vol 1.

Ruibal, R., Lloyd Tevis Jr, and Virgilio Roig. "The terrestrial ecology of the spadefoot toad *Scaphiopus hammondi*." *Copeia* (1969): 571-584.

Semlitsch, R. D. and Bodie, J. R. (2003), Biological Criteria for Buffer Zones around Wetlands and Riparian Habitats for Amphibians and Reptiles. *Conservation Biology*, 17: 1219–1228.

U.S. Fish and Wildlife Service. "Recovery plan for vernal pool ecosystems of California and southern Oregon." *Portland, Oregon*. xxvi (2005).



CALIFORNIA
NATIVE PLANT SOCIETY

Los Angeles /Santa Monica Mountains Chapter

15811 Leadwell Street
Van Nuys, California 91406-3113

Ronald Kosinski
Deputy Director, Division of Environmental Planning
California Department of Transportation
District 7, Division of Environmental Planning
100 S. Main Street, MS-16A
Los Angeles, CA 90012

VIA ELECTRONIC COMMUNICATION: liberty.canyon@dot.ca.gov

October 26, 2017

**RE: LIBERTY CANYON WILDLIFE CROSSING
MITIGATED NEGATIVE DECLARATION
PUBLIC COMMENT**

Dear Mr. Kosinski;

California Native Plant Society (CNPS) was informed today that CALTRANS will 'informally' honor requests from Los Angeles County Supervisor Sheila Kuehl and California State Assemblymember Richard Bloom to extend the public comment period for this project. CNPS appreciates the opportunity of the extension and looks forward to a submitting response by the November 8 deadline.

Sincerely,

Snowy Dodson, Chair
Los Angeles/Santa Monica Mountains Chapter
California Native Plant Society

CNPS-1

Caltrans has received your comment. Your comment response may be found in the November portion of this Letters section.

Doranne
Jung

2475 Micheltorena Street Los Angeles, CA 90039
Phone 323-664-5352 Fax 323-664-5135 djungles@aol.com

October 26, 2017

Mr. Ron Kosinski, *RK*
Deputy Director,
California Department of Transportation
Division of Environmental Planning
100 S. Main Street, MS 16A,
Los Angeles, CA 90012

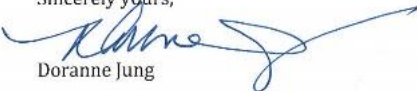
Dear Mr. Kosinski:

I am sending my support in this letter that I have also emailed to you so to be sure you receive it by your November 8 deadline. I am in support of the efforts of the environmental groups such as NWF to do whatever we can to protect the natural wildlife in the habitat in which they live and that means the Liberty Canyon Crossing.

By cutting off and cutting through the natural habitat we, human beings, have cut off their ability to live as they would if we had never inhabited this earth. Think if someone decided to build a road down the middle of your backyard cutting off your family from your garden, swimming pool and house/home. In effect, this is what we have done to the cougars and other wildlife. I grew up in Silver Lake where deer, coyotes, wild birds, skunks, raccoons and even an occasional cougar have been known to wander. Yes, once even a deer was able to cross from Griffith Park into our community. So I come from a neighborhood that has adjusted to living within a natural habitat of wildlife, and speaking on behalf of the humans, I believe we have survived!

By building the Liberty Canyon Crossing, this at least gives the wildlife, in particular the cougars, a chance live as naturally as possible in an environment freer from danger being killed unnecessarily. This is the least we civilized humans can do. Please count me in as a supporter of the Liberty Canyon Crossing.

Sincerely yours,



Doranne Jung

DJ-1

Thank you for your comment. Your support for the proposed project is acknowledged.



CITY of CALABASAS

October 26, 2017

Mr. Ronald Kosinski, Deputy District Director
 Calif. Dept. of Transportation, Div. of Environmental Planning, Region 7
 100 S. Main Street, MS 16A
 Los Angeles, CA 90012

Dear Mr. Kosinski:

The proposed Liberty Canyon Wildlife Habitat Connectivity Project is a laudable endeavor, and we are supportive of a project which will facilitate safe wildlife movement over the barrier presented by Highway 101 while also minimizing environmental impacts associated with the construction of such a project.

Accordingly, we offer the following comments in response to the Notice of Availability for the Initial Study and Mitigated Negative Declaration (IS/MND) prepared for the proposed project.

- 1) The project description fails to include any mention of the amount of site grading or of the amount of fill material likely required (imported) for placement via engineered grading around and above the new overpass structure(s) (refer particularly to Figures 7, 8, 9 and 10.) Additionally, any earth material that must be imported would require a source location (or possibly several locations); and the excavation of such material from the source location(s) must be identified as part of the project. Moreover, any potential environmental impacts from excavation work at identified source locations must be analyzed within the project IS/MND. Similarly, there would be an associated number of truck trips over some distance(s) over public roadways for the transport of all imported earth material, and this also must be accounted for within the environmental document. The project description should be expanded and amended to include at least a preliminary estimate of the grading quantities, to include cut, fill, and net grading quantities. Where a new import condition is indicated by such a preliminary grading analysis, then the anticipated source location(s) should also be identified for the imported material.
- 2) Aesthetic view impacts are inadequately addressed in the document. Highway 101 is a designated scenic corridor within the neighboring City of Calabasas, and it is likewise identified as a scenic corridor by the County of Los Angeles (the North Area Plan sets forth a number of policies calling for the protection and enhancement of scenic vistas, minimal alteration of the natural landscape, and the preservation of hillside backdrops as part of scenic views). Meanwhile, the proposed conceptual design for the over-crossing would place the freeway lanes beneath a newly constructed 165-foot wide and

100 Civic Center Way
 Calabasas, CA 91302
 (818) 224-1600
 Fax (818) 225-7324

**C-1**

Thank you for your comment. Your support for a wildlife crossing is acknowledged.

C-2

A modified version of Alternative 2 Design Option 2 has been identified as the preferred alternative. Please refer to section 1.8 Identification of a Preferred Alternative for further details. Imported borrow source location(s) will be identified in the final design phase of the project.

C-3

This portion of U.S. 101 is eligible for scenic highway designation. However, neither the County of Los Angeles nor surrounding cities have taken the necessary steps to initiate the Scenic Highway designation on State and County Roads. Only the Director of Transportation can designate a scenic highway on an eligible State Route, after application approval and review (California Streets and Highways Code Section 260-284).

In regards to the view of Stunt Mountain permanently blocked traveling southbound, we disagree. This portion of the roadway is in a cut section inclining downward. Views of distant peaks may fall from view as the traveler approaches the structure but will come back into view once a traveler traverses the bridge structure, so there is no permanent impact.

200-foot long bridge (plus retaining walls, sound walls, and fences), with a significant amount of earth, trees and various plants and shrubs piled on top. The result is that the freeway lanes would essentially travel through giant box culverts for approximately 165 feet beneath a newly manufactured landscape. A similar approach is envisioned for the adjoining segment of Agoura Road. While moving through these 165-foot long tunnels, motorists' and passengers' views of the surrounding landscape and the sky above will be completely obscured. For southbound travelers approaching the new over-crossing, views of the Santa Monica Mountains (with Stunt Mountain being the most prominent distant peak) will be substantially blocked. Yet the MND states that aesthetic impacts are not significant. We disagree, and recommend a revision to the environmental review document such that potential aesthetic impacts are more fully described and analyzed, and that mitigation measures are identified and presented to reduce potentially significant aesthetic impacts to less than significant levels (if possible). Alternatively, consideration could be given to preparing a *Statement of Overriding Considerations* for impacts that are unable to be fully mitigated, in association with a project EIR.

- 3) The analyses are inadequate regarding potentially significant impacts to air quality, water quality, noise, and greenhouse gases / climate change because the truck trips and grading equipment operations associated with the earth volumes being graded, imported and spread around and on top of the new over-crossing structure were not quantified or analyzed within the environmental document (see comment #1, above). After the grading quantities are estimated (per other comments in this letter), then the analyses for potential impacts to air quality, water quality, noise, and greenhouse gases / climate change may be properly accomplished.
- 4) The discussion of alternatives mentions only the requisite "no-build" option, and two variations of the project in the proposed location (one which bridges only Highway 101, and the other bridging both Highway 101 and Agoura Road). Two rejected alternatives mentioned briefly are below-ground culverts which not only would clearly be cost-prohibitive, but would fail to meet the basic project needs due to the highly constricted drainpipe type design. No truly responsive alternative locations for the overcrossing appear to have been explored. This is unfortunate.

The section of the MND entitled "Independent Utility and Logical Termini" (found on pages 10 and 11) suggests that the proposed location for the overcrossing is the one and only possible location for this facility. This is not necessarily the case, and a discussion of alternative over-crossing locations should have been included in the analysis. For example, Figure 5 shows the relationship between protected open space and park lands located both north and south of the freeway, and the "pinch-point" which occurs roughly at the Las Virgenes – Liberty Canyon area. Careful examination of the map reveals that large open space areas under public control exist in several locations along this stretch of the 101 Freeway besides the subject site. Additionally, several adjoining private properties could easily be acquired as well to augment nearby public land holdings and to help complete the required linkage. These alternative locations may be able to accommodate an overcrossing bridging Highway 101 and Agoura Road to

C-4

During more than 15 years of research in the Santa Monica Mountains, the NPS has identified increasing urbanization and habitat fragmentation as the primary challenges to protecting local wildlife and a functioning ecosystem. Increasing connectivity between the Santa Monica Mountains and other natural areas to the north, specifically to Los Padres National Forest north of 126, is critical for the long-term health of wildlife population in the Santa Monica Mountains, especially for wide-ranging species such as mountain lions. A study conducted by NPS and UCLA last year found that without increased connectivity over the 101 Freeway, especially for animals moving in from the north, there will be continued erosion of genetic diversity and an increased chance of extinction for mountain lions in the Santa Monica Mountains.

C-5

Additional discussion on the consideration of other alternatives, including underpasses and culverts, has been added to the environmental document.

accomplish the project objectives, and they might even offer an ability to do so at a lower cost and/or with fewer environmental impacts. But without a discussion and analysis of these alternatives, decision-makers, area residents and property owners, stakeholders, the media, and the taxpayers cannot fully understand whether the project site or an alternative location is the best option for accomplishing the objective of linking wildlife habitat areas on both sides of the freeway.

- 5) A statement within the Introduction (on page 20) describes sound walls that would be constructed as part of the project "to mitigate traffic noise and block light in order to make the crossing more conducive to wildlife crossing". The sound walls are not specifically identified on any renderings, maps or plans; nor are they described in any detail within the project description. How tall would these walls be? And how far would the walls extend from each of the four corners of the over-crossing bridge structure? The sound walls should be included as an essential project component, and should be factored accordingly into the aesthetic impacts analysis.
- 6) Following a lengthy review of statewide climate change policies, directives, and related CalTrans reports, the following conclusion is made on page 235:

"The proposed project is outside the coastal zone and not in an area subject to sea-level rise. Accordingly, direct impacts to transportation facilities due to projected sea-level rise are not expected."

The climate change issue relevant to the proposed project is not sea level rise and the potential for direct impacts to transportation facilities; rather, the issue centers on greenhouse gas emissions (such as from construction vehicles used in grading activities and the transport of fill and building materials to the project site. This portion of the IS/MND is flawed and should be rewritten to properly address the relevant issue and associated potential impacts.

- 7) The copy of the City of Calabasas General Plan Land Use Map (shown as Figure 13 on page 35), lacks a portion of the map legend and is therefore unable to be understood by the reader.

Thank you again for the opportunity to comment on the draft IS/MND for the proposed Liberty Canyon Wildlife Habitat Connectivity project. If you have any questions, please contact me at 818-224-1703, or by e-mail at: tbartlett@cityofalabasas.com.

Sincerely,



Thomas M. Bartlett, AICP, City Planner

Cc: Maureen Tamuri, AIA, AICP, Community Development Director

C-6

The proposed sound walls would be constructed along the outer edges of the proposed bridge. The sound walls were considered as part of the Scenic Resource Evaluation and Visual Impact Assessment, which concluded that the proposed project will have minimal visual impact, and will have minimal changes to the visual character of the area. Minimization measures would include the use of native plants to match the existing vegetation, and contour grading/slope rounding to help integrate the proposed vegetated bridge within its surrounding environment.

C-7

Please refer to the Construction Emissions and CEQA Conclusion discussions in section 3.2 Climate Change for further information.

C-8

Figure 13 has been adjusted to include the full map legend.



City Council

2100 Thousand Oaks Boulevard • Thousand Oaks, CA 91362
Phone 805/449.2121 • Fax 805/449.2125 • www.toaks.org

October 26, 2017

Claudia Bill-de la Peña
Mayor

Ronald Kosinski
Deputy Director, Division of Environmental Planning
California Department of Transportation
District 7, Division of Environmental Planning
100 S. Main Street, MS-16A
Los Angeles, CA 90012

Sent Via Email

RE: Initial Study with Proposed Mitigated Negative Declaration/ Environmental Assessment

Dear Mr. Kosinski:

On behalf of the City of Thousand Oaks I would like to express our support for the *Initial Study with Proposed Mitigated Negative Declaration/ Environmental Assessment for the wildlife crossing structure at Liberty Canyon in Agoura Hills*.

The genetic integrity and population stability of the wildlife in both the Santa Monica Mountains and the Simi Hills is of regional significance. There is broad, longstanding consensus in the scientific community that Liberty Canyon provides the best habitat linkage potential across the 101 Freeway between the Simi Hills and the Santa Monica Mountains. The ultimate long-term efficacy of this inter-mountain range habitat linkage shall depend on the location and characteristics of a new dedicated wildlife crossing structure. A dedicated crossing structure is vital to protect the area's ecological integrity and is a good public investment for the Santa Monica Mountains National Recreation Area.

The City of Thousand Oaks is surrounded by 15,000 acres of natural open space located at the foothills north of the Santa Monica Mountains. This open space is managed by Conejo Open Space Conservation Agency (COSCA), a joint powers agency of the City of Thousand Oaks and the Conejo Recreation and Park District. A wildlife corridor shall allow the safe and free passage of wildlife and improve the genetic diversity of both the flora and fauna of the Santa Monica Mountains Ecosystem of which Thousand Oaks is a part. The corridor shall help solve the regional problem of habitat isolation and fragmentation caused by the U.S. 101 and State Route 23 Freeways. We are grateful to Caltrans for your efforts in making this project a reality.

Sincerely,

Claudia Bill-de la Peña
Mayor

c: Senator Henry Stern
Assemblymember Jacqui Irwin

CMO: 660-40MLIH:COMMON\Legislation 2017\Letters of Support\2017\10 26 17 Caltrans Initial Study Support.docx

toaks.org

TO-1

Thank you for your comment. Your support for the proposed project is acknowledged.

Public comments in response to Liberty Canyon Land Bridge

October 26, 2017

Barbara L. Lyons, BA UCLA Geography, Ecosystems, Robert T. Lyons PE, SE

Page 1

To:

Ronald Kosinski
Deputy Director, Division of Environmental Planning
California Department of Transportation
District 7, Division of Environmental Planning
100 S. Main Street, MS-16A
Los Angeles, CA 90012
liberty.canyon@dot.ca.gov

From:

Robert T. Lyons, SE
Barbara Lyons
1766 Marian Ave
Thousand Oaks, CA 91360
columnandbeam@gmail.com

Please consider the following facts and comments when considering the Liberty Canyon Land Bridge.

This is a formal response to request for comments solicited by Cal Trans.

<http://www.dot.ca.gov/d7/projects/libertycanyon/>

1. Our background on this matter.
 - a. Our miniature horse, Marco Polo, at the age of 18 years, was killed by a mountain lion, in the Santa Monica Mountains. Mountain lion P45 is the likely mountain lion, but NPS has neither confirmed this, nor have they allowed release of data to us that might confirm this. Refer to FOIA request NPS-2017-00268, denied and currently in appeal. The reason for this lack of transparency by NPS is unclear. The reason a request for data that might provide closure was denied by NPS and the reason an appeal has taken months for a response is not understandable or explainable.
 - b. Reference 1 - <http://www.malibusurfsideneews.com/mini-horse-falls-victim-mountain-lion-malibu>
 - c. Reference 2 - <https://netposse.com/newsviewer.asp?id=3622>
 - d. Reference 3 - <http://losangeles.cbslocal.com/2016/10/26/mountain-lion-p45-suspected-of-killing-livestock-again/>
 - e. Reference 4 - <http://abc7.com/news/mountain-lion-attacks-on-the-rise-in-santa-monica-mountains-area/1575948/>
 - f. Since NPS did not respond to our request to examine our horse's body and the surrounding site, we doubt our horse is included in data collected by NPS on animal kills in the area. This casts doubt on the veracity and completeness of all NPS data, suggesting better oversight of the program is needed.

RBL-1

Thank you for your comment. Your opposition to the proposed project is acknowledged, and your comments are noted.

RBL-2

Caltrans cannot comment on NPS data or requests thereof.

Public comments in response to Liberty Canyon land Bridge

October 26, 2017

Barbara L. Lyons, BA UCLA Geography, Ecosystems, Robert T. Lyons PE, SE

Page 2

- g. We have personal involvement with the physical and emotional damage a mountain lion and flawed management policy can inflict. It is with this perspective we provide these comments.
- 2. Mountain lion behavior, like all big cats, is unpredictable.
 - a. A sound and reasonable policy to manage mountain lions MUST be in place before the population is allowed to distribute north. A sound policy must observe the well-being of the mountain lions and people alike. Mountain lions must be managed. In addition, practices and policies must be peer reviewed by independent experts in this field. We are unaware that this is implemented on the current NPS program in the Santa Monica Mountains.
 - b. Mountain lions pose a small risk to people in their territory. Mountain lions exhibiting excessive killing habits should be assumed to pose a greater and unacceptable risk to



Sign in Nojoqui Falls Park in Santa Barbara County. This is an example of a warning that can be found in wilderness and open spaces with mountain lion territories.

RBL-3

Management of wildlife (including mountain lions) is the jurisdiction of the state, specifically CDFW, although NPS works closely with the state when dealing with mountain lions (this also includes developing statewide policy and management for mountain lions). Safety of people is also specifically addressed by CDFW, since CDFW has jurisdiction over mountain lion management. Any mountain lion that presents a threat to human safety by behaving aggressively towards people is immediately removed by CDFW, and if this situation were to arise, NPS would assist CDFW with this. According to NPS, in studying 61 mountain lions over the last 15 years, none have ever behaved aggressively towards people. CDFW also handles livestock losses, and people can acquire a permit to remove a mountain lion that have killed livestock.

Public comments in response to Liberty Canyon land Bridge

October 26, 2017

Barbara L. Lyons, BA UCLA Geography, Ecosystems, Robert T. Lyons PE, SE

Page 3

people in their territory, especially to children. Proactive response to mountain lions exhibiting especially aggressive behavior must be taken at first signs of such behavior.

- c. The importance of people's lives, and their property – pets and livestock – should be considered in the management of mountain lions.
3. Issues with NPS policy.
 - a. NPS, a federal agency, has jurisdiction over the mountain lion population in the Santa Monica Mountains and seems to be in part the driving force for the land bridge. NPS was involved with the study that determined the need for genetic diversity for the mountain lion population. Refer to Proceedings B *Interactions between Demography, Genetics, and Landscape Connectivity increase extinction probability for a small population of Large Carnivores in a Major Metropolitan Area*, August 11, 2016.
 - b. The mountain lion management policy applied by NPS is irrational and fails to recognize risk to people, pets and livestock. The NPS policy appears unique for large predators, such as mountain lions. We are not aware of a complete hands-off policy similar to the NPS policy employed anywhere else in California, in the US or around the world, based on our research. NPS policy is to allow known aggressive mountain lions to continue to kill pets and livestock without interference.
 - i. Mountain lion P45 is credited with killing more than 50 animals as of late 2016, though we are not aware that NPS has confirmed this figure. While the exact figure may not be acknowledged, the number of animals publically known and verified lost to P45 is shockingly large. A children's school in Malibu hills lost many animals to a mountain lion in a single incident, believed to be P45, and NPS response was no response.
 - ii. Reference 1 - <http://www.latimes.com/local/lanow/la-me-ln-alpaca-mountain-lion-20161128-story.html>
 - iii. Reference – 2
<https://www.washingtonpost.com/news/animalia/wp/2016/11/30/an-l-a-mountain-lion-may-be-put-to-death-his-crime-llama-slaughter/>
 - iv. The NPS policy is to allow a mountain lion to kill pets and livestock is wrong for the Santa Monica Mountains area and cannot be allowed to extend throughout the state.
 - v. Refer to http://www.voiceofwashon.org/user-content/kim_chandler as an example of a management policy applied in the State of Washington that understands and respects the lives of people and their property.
 - c. NPS response to the killing spree of P45, and perhaps other mountain lions in the Santa Monica Mountains, is to place a tracking collar on him and allow him to continue roaming his territory in occupied areas on the Santa Monica Mountains, continuing to kill pets and livestock.
 - d. NPS considers the behavior of mountain lions like P45 as normal and expected.

RBL-4

NPS does not have jurisdiction over the mountain lion population of the Santa Monica Mountains; however, they do have jurisdiction over NPS-owned lands, which consists of 15% of the Santa Monica Mountains and Simi Hills. It is NPS's mandate (the NPS mandate is the same at every national park in the entire system, throughout California, and the entire country) to help preserve the mountain lion population, along with all other wildlife species, but they do not manage the mountain lion population.

Public comments in response to Liberty Canyon land Bridge

October 26, 2017

Barbara L. Lyons, BA UCLA Geography, Ecosystems, Robert T. Lyons PE, SE

Page 4

- e. Furthermore, to protect livestock against predation, they suggest that residents lock their livestock in cages, with walls and roof. This is an absurd concept, as anyone with livestock must understand. Large animals need the ability to roam for good physical and mental health. It begs the question – why does NPS place the value of mountain lions over the value of people’s property and beloved animals, let alone the lives of residents



Example of mountain lion proof livestock cage.

<http://mountainlion.org/Upload/LowCostPenPlans.pdf>

- themselves. This is NOT a management program. This is a preservation program that ignores people’s rights.
- i. Be aware that mountain lions are opportunistic hunters and will hunt by day for the sake of hunting if the opportunity arises. To effectively protect livestock, animals must be caged 24/7.
 - ii. Ask yourself this - If a dog exhibits aggressive behavior, do we lock up people and animals in the neighborhood to protect them?
4. Expanding mountain lion behavior in an urban setting north of the 101 exposes more people to the risk of mountain lion attacks.
- a. While mountain lion attacks on people have been infrequent, they do occur. Refer to <https://www.wildlife.ca.gov/Conservation/Mammals/Mountain-Lion/Attacks> for a list of recent mountain lion attacks in California compiled by CDFW. The list includes 15 verified attacks between 1986 and 2014, with 3 of these involving fatalities. Notice the locations for these attacks are wilderness or open space spaces, where human contact

Public comments in response to Liberty Canyon land Bridge

October 26, 2017

Barbara L. Lyons, BA UCLA Geography, Ecosystems, Robert T. Lyons PE, SE

Page 5

would be less frequent than the urban settings that will be exposed once the land bridge is operational.

5. The state of California response to mountain lion attacks, at least against pets and livestock, is to allow victims to track and shoot the offending mountain lion. They have ten days to complete this task or lose the right.
 - a. Refer to <http://archive.vcstar.com/news/mountain-lion-kills-dog-in-moorpark-ep-371263916-350633761.html/> and <http://archive.vcstar.com/news/santa-rosa-valley-residents-think-mountain-lion-may-be-killing-pets-ep-371453258-350709411.html/> for examples.
 - b. This is an ineffective policy. First, it places the burden of management on the victim, who must either be an expert hunter with the inclination to hunt a mountain lion, or hire a tracker and hunter. It also precludes application of possible non-lethal approaches to management, such as relocation.
 - c. If killing the animal is the correct approach, use of proper methods of humane euthanizing administered by professionals would be clearly more appropriate.
 - d. The conclusion – if mountain lions are allowed and encouraged to expand their territory into more populated areas, a sound management program, not a preservation program, MUST be established first. The NPS policy does not respect human life, pets or livestock and the State of California Policy is ineffective and inhumane. Furthermore, if NPS is involved with the program north the Santa Monica Mountains, sound coordination between CDWF and NPS is necessary. Also, regardless of NPS involvement, the program requires independent reviews and oversight.
6. **Recommendation – opt for the no-build option.** If genetic diversity of the Santa Monica Mountains mountain lion population is needed, as suggested by the above mentioned study published in Proceedings B, design another approach in lieu expanding mountain lion territory into more urban areas. According to this study, the population of the Santa Monica Mountains may be sustained by other methods such as translocation of animals into the Santa Monica Mountains. Furthermore, this reports points out that mountain lions currently have access across the 101 by underpasses and by crossing the freeway. It is worth noting that P45 is a natural translocation that entered the Santa Monica Mountains from outside the area a few years ago

Respectfully Submitted
Robert and Barbara Lyons
10-16-17

RBL-5

Relocating all the mountain lions in the Santa Monica Mountains is not a feasible solution, because there is no place to relocate them to in which there are not mountain lions already. Mountain lions are highly territorial, and there are significant issues with putting animals into the territory of another. This is especially not feasible for animals that have been involved with depredation of livestock. If they have killed livestock, relocating mountain lions would just move the problem somewhere else. Also, it should be noted that the wildlife overpass will not bring additional animals into the Santa Monica Mountains; it will provide the mountain lions that are already in the area with a way to cross the freeway without being killed by oncoming traffic. Mountain lion territory will not be expanded by the crossing. In fact, it may reduce their use of developed areas.

Finally, your comment regarding P-45 is correct. According to NPS, it appears that P45 came into the Santa Monica Mountains from the north at some point in recent years, based on genetics. Assuming this is the case, he would be the second animal known to have successfully crossed and reproduced, after P12 in 2009, in the 15 years of the study.

Thank you for your comments. These comments are well noted and are important to us. Human safety comes first, and all the partners of the project will work together to address public concerns throughout the life of the project.

October 28, 2017

Mr. Ron Kosinski-Deputy Director 

California Dept. of Transportation

Division of Environmental Planning

100 South main Street, MS 16A

Los Angeles, CA 90012

Dear Mr. Kosinski:

As a taxpayer I am concerned about the animal bridge in the Agoura area.

According to the article in the Acorn 80 Percent of the funds for the bridge are coming from private donors. I would like a list of those people and organizations. The other 20 Percent will be coming from funds earmarked for wildlife conservation. I would like to know the name of this specific 20 Percent fund. The cost estimate has now grown to 60 million. By the time it is finished if it goes ahead it will cost 100 Million. Who will pay this overrun? Will the private donors pay? I doubt it.

After this project is built, who will pay the cost of maintaining this boondoggle? Will the private donors pay for maintenance? Or will it be the taxpayers? When this mountain lion kills someone's livestock or worse someone's family member who will pay for their loss?

Years ago a woman was killed by a mountain lion on one of the hiking trails in this aea.

This whole project is lunacy. I would appreciate your answers to my questions. I understand that this is not your project and you are only here to execute it if it is approved.

Sincerely,



Charles E. Ammann

5850 N. Greenview Road

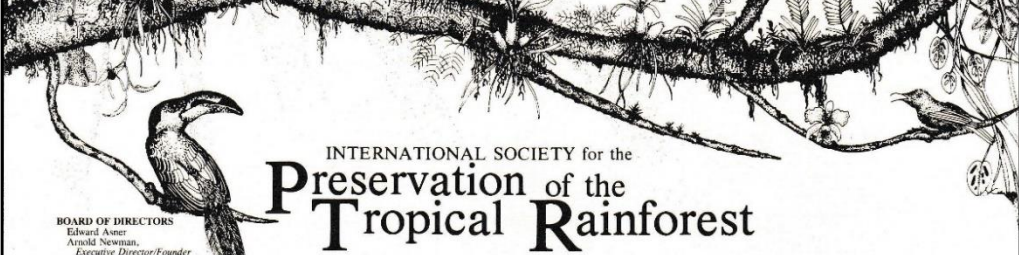
Calabasas, CA 91302

CA-1

Thank you for your comment. Your opposition to the proposed project is acknowledged.

The proposed wildlife crossing at Liberty Canyon is a public/private partnership between the California Department of Transportation (Caltrans), the National Park Service (NPS), the National Wildlife Federation (NWF), the Santa Monica Mountains Conservancy, the Resource Conservation District of the Santa Monica Mountains, the Mountains Recreation and Conservation Authority, the State Coastal Conservancy, and the Santa Monica Mountains Fund. The National Wildlife Federation and the Santa Monica Mountains Fund established a fundraising campaign, #SaveLACougars, to drive the campaign's fundraising and education strategy to raise funds specifically for the wildlife crossing project.

At this time, all funding for the proposed project is from private sources. #SaveLACougars is primarily seeking private philanthropic dollars, although public dollars earmarked for conservation have been, and will continue to be, sought. The fundraising efforts do not seek to divert state transportation or other taxpayer funds from needs such as schools, hospitals, bridges, or road repairs. Up-to-date fundraising progress and other information is available at www.savelacougars.org.



INTERNATIONAL SOCIETY for the
**Preservation of the
Tropical Rainforest**

BOARD OF DIRECTORS
Edward Auer
Arnold Newman,
Executive Director/Founder
Rouanne Keener,
Executive Director/Founder
Dr. William Koenig - *Treasurer*

HONORARY SPONSORS
Howard L. Berman,
Member, U.S. Congress
Edward M. Kennedy
Member, U.S. Senate
John Kerry, *Member, U.S. Senate*
Howard Wolpe,
Member, U.S. Congress

BOARD OF ADVISORS
Steve Allen, *Entertainer*
Dr. Charles Benatti,
Prof. of Biogeography, UCLA
Dr. Craig Black, *Director,*
Los Angeles County Museum of Natural History
Dr. Brent Blackwelder,
Vice President, Friends of the Earth
Dr. Noel J. Brown, *Director of United Nations Environmental Programme for North America*
Dr. Terry Erwin, *Director, Man and the Biosphere, Biological Diversity Program, Smithsonian Institution*
Prof. James Hansen, *Director, NASA Goddard Institute for Space Studies*
Dr. Henry Heimlich, *President, Heimlich Institute*
Dr. Charles Hogue,
Curator of Entomology, Los Angeles County Museum of Natural History
Prof. Vladimir P. Kartsev,
Director, Publishing Division for United Nations
Norman Lear, *Producer*
Donald Lech, *Executive Director, Global Tomorrow Coalition*
Dr. Mildred Mathias, *Professor Emerita of Botany, UCLA*
Dr. D. D. Moss, *Director Emerita, The International Center of Aquaculture, Auburn University*
Prof. Norman Myers, *Forestry Consultant to The World Bank*
John Ritter, *Entertainer*
Dr. Edward S. Ross, *Curator Emerita of Entomology, California Academy of Sciences*
Dr. George Schaller,
Research Zoological Director, New York Zoological Society
Thomas B. Stiel, Jr.,
Senior Staff Attorney, Natural Resources Defense Council
Dr. Donald E. Stone, *Executive Director, Organization for Tropical Studies, Inc.*
Dr. George M. Woodwell, *Director, Woods Hole Research Center*

BRAZIL
Marcelo Cace-Vasconcelos de Oliveira,
President of the Council of Mayors, State of Minas Gerais
Roberto Burle Marx, *Environmental Landscape Architect*
Dr. Olynpio Faissol Pinto,
Executive Director, Institute of Ecological Research
Vera M. F. de Silva,
National Institute of Amazonian Research (INPA)

COSTA RICA
Rodrigo Carazo O., *Former President of Costa Rica*
Alvaro Ugalde, *President, Fundacion Neotropica*

JAPAN
Izumi Masuwaka, *President/Founder Green Environmental Organization*

PERUVIAN FOUNDATION ISIPR

HONORARY DIRECTORS
Jose Sills Alvan Del Castillo,
Mayor of Iquitos
Mandel Ferreira, *Director of Tourism*
Almiral Ramon Arropole Mejia,
Peruvian Navy
Benjamin Soria Solano, *Engineer, Ministry of Agriculture*
Arlene Newman, *Executive Secretary*

October 31, 2017

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

Dear Mr. Kosinski:

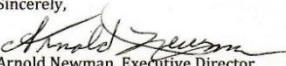
There is rapt attention on the preservation and genetic health of southern California's mountain lion population and now general agreement that the Liberty Canyon Wildlife Crossing, or its alternative, an underpass or tunnel, can meaningfully reduce automobile fatalities as well as restore genetic health.

A great many of us who have been cheering-on this epic project since its inception, as well as the considerable number of concerned citizens who are now very much heart and soul embracing the crossing, are poignantly perplexed - as well as righteously annoyed - at the more recent aspect of a human recreational element being insinuated into the project.

It should be abundantly apparent to all that mountain lions strive to survive in our mountains by studiously using all the considerable olfactory and visual assets they are blessed with, to avoid any and all scent and sight of human contact. As its title suggests, The Santa Monica Mountains National Recreation Area presents vast opportunities for human recreation. The wildlife overpass must not be one of them, or our southland lions will studiously avoid the heroically costly overpass.

I among these citizens am flummoxed as to how a recreation concept as incompatible to a successful travel over the crossing by our lions has slithered into this glorious project.


My constituencies respectfully request that recreation be deleted from the Liberty Canyon Wildlife Crossing.

Sincerely,

Arnold Newman, Executive Director
International Society for the Preservation of the Tropical Rainforest

President, Oak Forest Canyon Homeowners Association

3931 Camino de la Cumbre • Sherman Oaks, CA 91423 • (818) 788-2002 • FAX (818) 990-3333

AN AMERICAN AND PERUVIAN NON-PROFIT ORGANIZATION



AN-2

Thank you for your comment.

Due to feedback received, the project team has removed the multi-use trail from the project, and a multi-use trail will not be built as part of this project.

CANYON BACK ALLIANCE

a non-profit public benefit corporation
WWW.CANYONBACK.ORG • INFO@CANYONBACK.ORG

November 2, 2017

Ron Kosinski, Deputy District Director
 California Department of Transportation
 Division of Environmental Planning
 100 S. Main Street MS16A
 Los Angeles, CA 90012
liberty.canyon@dot.ca.gov

RE: Liberty Canyon Wildlife Crossing Project

Dear Mr. Kosinski:

Canyon Back Alliance (“CBA”) is a Los Angeles-based nonprofit dedicated to preserving public access to recreational trails in the Santa Monica Mountains.

CBA has reviewed the proposed Mitigated Negative Declaration for the Liberty Canyon Wildlife Crossing project and has the following comments.

While it is CBA’s mission to preserve public access to hiking trails, the more important purpose of the proposed wildlife crossing at Liberty Canyon is the safe passage of eight target species, including large mammals such as mountain lions, bobcats, and coyotes. Therefore, although CBA is very much in favor of utilizing the bridge to create a pathway for pedestrians, mountain bikers, and equestrian users, we believe that it is critical to develop the project in a way that does not negatively impact wildlife that may use it.

Alternative 2, design option 2, appears to be the most promising alternative both for wildlife and trail users as it crosses both the I-101 Freeway and Agoura Road, and will be effective for all target species.

So long as planned post-construction studies determine that human activity on the bridge does not negatively impact wildlife, CBA supports the project.

Sincerely,



Tom Freeman, President

Canyon Back Alliance • c/o Tom Freeman at Bird Marella
 1875 Century Park East • 23rd Floor • Los Angeles • California • 90067

CBA-1

Thank you for your comment. Your support for the proposed project is acknowledged.

Due to feedback received, the project team has removed the multi-use trail from the project, and a multi-use trail will not be built as part of this project.



TOPANGA TOWN COUNCIL

P.O. BOX 1088 • TOPANGA, CA 90290 • 310.455.3001 • www.TopangaTownCouncil.org

STACY SLADGE
PRESIDENT

CAROL CARDEE
VICE PRESIDENT

LINDSAY ZOOK
SECRETARY/TREASURER

TAM TAYLOR
COMMUNITY LIAISON

JOHN WALKER
GOVERNMENT LIAISON

November 6, 2017

Via U.S. Mail and E-Mail (LibertyCanyon@dot.ca.gov)

Ronald Kosinski
Deputy District Director
Division of Environmental Planning, Division 7
California Department of Transportation
100 S. Main Street, MS 16A
Los Angeles, California 90012

Re: Position of Topanga Town Council re Liberty Canyon Wildlife Crossing

Dear Deputy District Director Kosinski:

The Topanga Town Council ("TTC") has reviewed the Initial Study With Proposed Mitigated Negative Declaration/Environmental Assessment, dated September 2017, with respect to the Liberty Canyon Wildlife Connectivity Project ("Liberty Canyon Wildlife Project"), including the multiple alternatives currently being considered for a proposed wildlife crossing at Liberty Canyon that are set forth therein. We have engaged in independent research regarding the merits of several aspects of those alternatives. Based upon our review and analysis, we strongly urge Caltrans and the National Park Service ("NPS") to consider revising and expanding the range of options offered to the public. As it stands now, neither Alternative 1 nor 2 sufficiently or optimally addresses the pressing needs of the wildlife species most in need of a safe crossing; i.e., our local mountain lions. Although amongst the alternatives presented we favor a modified version of Alternative 2, Design Option 2, we cannot endorse any of the build Alternatives until and unless our concerns about the recreational use element are addressed. Further, before any option is selected we would like to see some substantive analysis regarding the merits of a tunnel intended primarily (or exclusively) for mountain lions.

The TTC wholeheartedly supports the objective of Caltrans and the NPS to build a wildlife crossing at Liberty Canyon to improve the ability of many local wildlife species, and most critically our threatened local mountain lion population, to safely transit between the Santa Monica Mountains and the Santa Susana Mountains. There is no dispute that the 101 Freeway, as well as many other local freeways and highways, have substantially interfered with the ability of mountain lions and many other wide-ranging species to connect with other members of their species. As a direct result, their ability to interact and successfully procreate has been substantially impeded. In the case of our local mountain lion population, their resulting isolation has drastically reduced their genetic diversity and threatens their long-term survivability in the greater Santa Monica Mountain region. In addition, those same freeways and highways have, and continue to, extract a heavy toll on wildlife that attempts to cross those roads. As a result of the foregoing, it is abundantly clear that some form of wildlife crossing over the 101 freeway is essential and we are pleased that both Caltrans and the NPS are working to create such a crossing.

Of the proposed alternatives, Alternative 2, Design Option 2, seems to provide the greatest improvement in connectivity for wildlife. However, we cannot unequivocally support that Alternative as presented, as it has several significant problems. First, we are concerned that each of the proposed build alternatives includes a multi-use recreational trail. Based upon our research, the inclusion of such a trail is not recommended by wildlife crossing experts and is likely to substantially interfere with the use of the crossing by mountain lions, and possibly by other wildlife that generally prefer to avoid places where people are present. Second, we continue to have questions as to whether mountain lions are more or

TTC-1

Thank you for your comment.

Due to feedback received, the project team has removed the multi-use trail from the project, and a multi-use trail will not be built as part of this project.

TTC-2

From a wildlife perspective, the best option in the West Liberty Canyon area is a wide, vegetated, wildlife overpass. Although underpasses can also work for many species, their effectiveness is heavily dependent on the openness of the structure (height x weight/length). According to Caltrans specifications, the largest culvert that can be put under the 101 Freeway by tunnel-jacking is 13x 13, which at 13x 13x300 ft. long would be long and dark with low openness, and therefore not be effective for many species, including mule deer. A larger tunnel that would provide connectivity for more species, such as 32 ft. wide by 15 ft. high tunnel, would require cut and cover construction, which would mean shutting down the 101 Freeway, which is not considered feasible.

Two other disadvantages of tunnels is that they could not be vegetated to provide natural habitat, particularly for smaller species, and the tunnels would go only across the 101 Freeway and not across adjacent Agoura Road. A wildlife overpass

Ronald Kosinski
Deputy District Director
Division of Environmental Planning, Division 7
California Department of Transportation
November 6, 2017
Page 2

less likely to use underpasses/tunnels vs. overcrossings in an urban environment. We believe that more research (or explication of existing research) should be done on this point before a final crossing alternative is selected. As it stands now, a substantial body of research shows at least a slight preference by mountain lions for underpasses, culverts, or tunnels. That said, the circumstances under which that preference was expressed may (or may not) apply here.

As for incorporating recreational activities into a crossing design, Anthony Clevenger, a researcher who has spent many years studying the efficacy and effects of different types of wildlife crossings in Banff National Park and other locations, recommends against including human activities anywhere near a wildlife overcrossing. With respect to both landscape bridge and wildlife overpass forms of wildlife crossings, Clevenger "highly recommends" that they be used exclusively for wildlife and that human use of and activities near those structures should be "prohibited." (See, Clevenger, Anthony & Huijser, Marcel (2011) Wildlife Crossing Structure Handbook, Design and Evaluation in North America, Appendix C, Hot Sheet 1 [Landscape Bridge] and Hot Sheet 2 [Wildlife Overpass].)

In addition, recent research regarding the behavior of mountain lions in the Santa Cruz Mountains in California reaffirms that mountain lions fear humans and strongly react to the presence of humans by limiting their time in human environments and attempting to avoid those areas altogether. "Pumas fear humans in this human-dominated ecosystem, demonstrated by immediate responses to human stimuli, altered feeding behavior, reduced occupancy of developed areas, and strong avoidance of development when engaged in reproductive activity." (Wang, Y., Smith, JA, Wilmers, CC (2017) Residential Development Alters Behavior, Movement, and Energetics in an Apex Predator, the Puma, p.11/17 [footnotes omitted].)

As the proposed Liberty Canyon Wildlife Project is currently estimated to cost in excess of \$50 million, it makes no sense to include a design element that is likely to negatively impact its efficacy as a wildlife crossing for one of its primary intended beneficiaries; our local mountain lion population. We therefore strongly recommend that the contemplated multi-use trail be eliminated from each of the contemplated build alternatives and that appropriate measures be implemented to prevent human activity from taking place on, or in the immediate vicinity of approaches to, the crossing. We also believe that a tunnel option must be more carefully analyzed and possibly adopted, whether in addition to, or instead of, the overpass.

We thank Caltrans and the NPS in advance for their anticipated careful consideration of all of the factors relating to this important determination, including most critically those that we have set forth in this letter, before they make their decision regarding which design for the proposed Liberty Canyon Wildlife Project to select and proceed with.

Topanga Town Council



Stacy Sledge
President

Topanga Town Council
Stacy Sledge President
Carrie L. Carrier Vice President
Lindsay Pedroza Secretary/Treasurer
Tam Taylor Community Liaison
John J. Waller Government Liaison

over both the 101 Freeway and Agoura Road would be ideal because it would provide maximum connectivity for the full range of wildlife species, including carnivores such as mountain lions, bobcats, and coyotes, but also mule deer and smaller species like small mammals, reptiles, and amphibians that are often unwilling to cross even small roads.

A wide overpass is needed to provide effective connectivity for a range of wildlife. According to The Federal Highway Administration's Wildlife Crossing Structure Handbook (Clevenger and Huijser 2011), the recommended width is 165-230 ft. and the minimum width is 130-165 ft. 165 ft. constitutes a minimum width for effective connectivity, especially given that no structures have been built over such a wide freeway to date.



TOPANGA CHAMBER OF COMMERCE
Where Nature, Community & Business Thrive Naturally

November 6, 2017

Ronald Kosinski
Deputy Director, Division of Environmental Planning
California Department of Transportation
District 7, Division of Environmental Planning
100 S. Main Street, MS-16A
Los Angeles, CA 90012

Dear Mr. Kosinski:

Thank you for the opportunity to comment on the Liberty Canyon Wildlife Crossing Project - Proposed Mitigated Negative Declaration/Environmental Assessment.

I/we support a safe and sustainable wildlife crossing at the US-101, just west of Liberty Canyon Road, in the city of Agoura Hills. This will allow wildlife to move freely once again between the Santa Monica Mountains, the Simi Hills, Santa Susana Mountains, and the Sierra Madre Mountain Range. It will restore and increase habitat connectivity where it has been fragmented by the 101 freeway, reduce wildlife mortality, and allow for the exchange of genetic material for our threatened mountain lions, bobcats, and other species.

Alternative 2 is the Superior Crossing. No Position on Design Option.

Caltrans studied only three crossing alternatives:

1. No Build Alternative.
2. Alternative 1 - A 165 foot wide by 200 foot long bridge across the 101 only.
3. Alternative 2 - A 165 foot wide by 200 foot long bridge across the 101, plus, an extension that is built over Agoura Road. The extension has two design options: a 48 foot wide bridge or a 54 foot wide bridge.

I/we support Alternative 2 because it is the superior choice for all wildlife crossing; and, we concur with the Santa Monica Mountains Conservancy, taking no position on the design option element of 48 or 54 feet wide. Although, the 48 foot design may have less environmental impacts, the city of Agoura Hills has clearly and consistently demonstrated that this is not an option that will work for the city. It makes no sense to challenge their authority or analysis and risk having to settle for no add-on bridge design at all (Alternative 1). Thus, 48 feet is not a feasible design option.

Tunnels Should be Studied as an Alternative.

Research indicates constructing tunnels under freeways and roadways for safe wildlife passage is a data-proven success, including for mountain lions. In many instances, tunnels are the preferred method for cougar crossings. Yet, tunnels were not studied as an alternative in the MND. Why? Adequately analyzing them should be added as a requirement now in this Draft. It is the only way to make an accurate comparison in line with the other *build* alternatives. The material that is referenced about tunnels by Caltrans outside of this document, cannot be substantiated because none of it has been included or attached in the report.

TCC-1

Thank you for your comment. Your support for the proposed project is acknowledged.

TCC-2

From a wildlife perspective, the best option in the West Liberty Canyon area is a wide, vegetated, wildlife overpass. Although underpasses can also work for many species, their effectiveness is heavily dependent on the openness of the structure (height x weight/length). According to Caltrans specifications, the largest culvert that can be put under the 101 Freeway by tunnel-jacking is 13x 13, which at 13x 13x300 ft. long would be long and dark with low openness, and therefore not be effective for many species, including mule deer. A larger tunnel that would provide connectivity for more species, such as 32 ft. wide by 15 ft. high tunnel, would require cut and cover construction, which would mean shutting down the 101 Freeway, which is not considered feasible.

Two other disadvantages of tunnels is that they could not be vegetated to provide natural habitat, particularly for smaller species, and the tunnels would go only across the 101 Freeway and not across adjacent Agoura Road. A wildlife overpass over both the 101 Freeway and Agoura Road would be ideal because it would provide maximum

Funding Change.

To date, the National Wildlife Federation's fundraising efforts have fallen short of anticipated goals - particularly from the private sector. Therefore, cost, and the cost of having to garner significantly more *public* sector dollars than originally disclosed and planned for, is a growing concern. With more public dollars comes a greater threat of human access and public use. Therefore, *if* tunnels are a feasible option -- they are less expensive to build, and would diminish the threat of human use or exploitation and recreational biological impacts. In other words, because the funding equation has changed from the original plan, we need to re-evaluate and look at all of our options equally, creatively, and with a fresh light.

Utilizing the Current Liberty Canyon Underpass.

Another option that does not appear to be addressed in this document is the utilization of the current Liberty Canyon underpass. Accordingly, in the initial plan, phase 1, was to have been the re-vegetation of the areas leading to and beneath the freeway to aid in potential wildlife crossings. What happened to this? The construction phase of building the overpass is estimated to take a minimum of 2.5 years once everything else is completed. Clearly we are still *years* away from a functioning overpass. There should therefore be something meanwhile put into place; and further, why not explore other creative temporary, or permanent solutions for the current Liberty Canyon underpass because it already exists? Perhaps utilizing two of the four lanes, or shutting down the off-ramp during certain times of the evening? There are numerous options that can be studied and analyzed.

Keep the Wildlife Crossing Wild. Remove the Recreational Element. The EA is Deficient with Regard to Recreational Uses.

There are numerous references to recreation and recreational elements woven in and found throughout the MND/EA and yet recreation/impacts have not been studied in the assessment! For example:

Pg. 20 - "constructing a five foot multi-use, single track compacted dirt recreational trail on the overcrossing"

Pg. 43 - "Regional Bicycle Master Plan - A potential bicycle hub is identified at the Liberty Canyon Road Trailhead... as such the follow goal and objective may be relevant to the project. Objective 1:1: Connectivity through an expanded bikeway network...expand the existing bicycle network to provide a comprehensive, regional network of bicycle transportation facilities that increases connectivity between homes, jobs, public transit, schools, trailheads, and recreational resources for a variety of users in the Las Virgenes-Malibu region."

Affected Environment: Environmental Consequences

*Pg. 161 -The proposed project has the potential to connect existing multi-use trails within the Santa Monica Mountains and provide a pathway across US-101 for recreation. Construction of a multi-use, single-track recreational trail on the wildlife overcrossing for recreational activities including hiking, mountain biking, and horseback riding can provide this connection. The purpose of the trail is to increase opportunities for recreation in the area, and in particular to allow trail users on either side of 101 to connect to trails on the other side.

*Page 165 - As the overcrossing presents an opportunity to educate trail users and visitors about the wildlife species and native vegetation within the study region as well as the overcrossing structure itself placement of an educational kiosk within the BSA should be considered. In coordination with the SMMC, MRCA, and RCDSMM, construct an education kiosk within the BSA....

The Liberty Canyon Wildlife Crossing should be for wildlife and wildlife only -- not for a circus of humans, dogs, horses, bicycles, tourists, groups, hikers, picnickers, etc. and all of the accompanying impacts - trash, dog waste, boom blasters, food, cigarettes, et al. And, as a result of that increased use, there would be a new need to potentially build additional parking facilities and access others, ADA access, visitor kiosks, restrooms, and even sidewalks. It defeats the entire purpose, bringing in development and people where there are few to none now. Nevermind, the noise, light, parking, and

connectivity for the full range of wildlife species, including carnivores such as mountain lions, bobcats, and coyotes, but also mule deer and smaller species like small mammals, reptiles, and amphibians that are often unwilling to cross even small roads.

A wide overpass is needed to provide effective connectivity for a range of wildlife. According to The Federal Highway Administration's Wildlife Crossing Structure Handbook (Clevenger and Huijser 2011), the recommended width is 165-230 ft. and the minimum width is 130-165 ft. 165 ft. constitutes a minimum width for effective connectivity, especially given that no structures have been built over such a wide freeway to date.

TCC-3

#SaveLACougars is primarily seeking private philanthropic dollars, although public dollars earmarked for conservation have been, and will continue to be, sought. Up-to-date fundraising progress and other information is available at www.savelacougars.org.

TCC-4

In regards to updating the current Liberty Canyon Undercrossing, Caltrans, Resource Conservation District of the Santa Monica Mountains (RCDSMM), The Mountains Recreation and

traffic impacts on wildlife, and on the surrounding and adjacent rural communities. And again, none of these impacts have yet been studied in this document.

There is zero evidence that any wildlife crossing allows people. As a matter of fact, they are strictly prohibited:

For 25 years, Banff National Park has been a world leader with the most numerous and varied wildlife crossing structures in the world (36 underpasses and 6 overpasses). And, it supports the world's longest, year-round monitoring program and largest data set on wildlife mitigation. Does human use of wildlife crossings affect how animals use them? Yes, according to these experts, "when people use crossings, animals tend to use them less. Human use of overpasses is strictly prohibited in Banff National Park." And even more alarming for Liberty Canyon, is that it is situated in one of the largest urban populations centers in the country. These potential visitors along with millions of potential tourists - all with easy access off the 101 - recreating on and across the *world's largest wildlife crossing* would wreak havoc on this wildland area.

<https://arc-solutions.org/wp-content/uploads/2012/03/Clevenger-et-al-2009-Banff-wildlife-crossings-project.pdf> <https://www.pc.gc.ca/en/pn-np/ab/banff/info/gestion-management/enviro/transport/tch-rc/passages-crossings/faq/10>

Another example, is the 2016 completion of a new \$9.5 million bridge (150 feet wide spanning 6 highway lanes) "just for wildlife overcrossing" in Tucson, Arizona, where, "officials closed the Oracle Road crossings to humans, their all-terrain vehicles, bikes and horses. Cameras mounted on them and throughout their approaches will help watch for trespassers to be cited, as well as mountain lions and sheep to be counted. Campbell called it a "grand closing" for the benefit of all species traversing the road." <http://www.azcentral.com/story/news/local/arizona-investigations/2016/05/11/95-million-bridge-just-wildlife-opens-near-tucson/32600077/>

If Caltrans and the project team want to build a people crossing for recreation, education, etc., they should build it as a separate project.

An important determination that needs to be made in this study, is how to best record a covenant (or facsimile thereof) on the Liberty Canyon Wildlife Crossing to ensure that it is built for wildlife only, dedicated as such today, and remains wild and for wildlife only in perpetuity.

Caltrans should initiate the process now of working with the National Park Service to study and produce a savvy new regional plan - one that would address the dire needs of wildlife crossings under and over freeways throughout Los Angeles County - an integrated, cost effective, efficient, timely approach and execution, to ensure the survival of our most threatened wildlife species.

Thank you again for this opportunity to comment on the Liberty Canyon Wildlife Crossing. We look forward to Caltrans addressing these questions and inadequacies in the MND/EA.

Sincerely,
Joseph Rosendo

Topanga Chamber of Commerce
Past-President
Community Liaison
P.O. Box 185
Topanga, CA 90290

Conservation Authority (MRCA), and Santa Monica Mountains Conservancy (SMMC) have already begun construction of the Liberty Canyon Interim Project. The project will connect existing riparian areas both upstream and downstream of the 101 freeway by utilizing the current Liberty Canyon underpass (building a "dry stream bed" feature coupled with the planting of native vegetation). The intention is to create the appearance of a connected riparian corridor to encourage safe wildlife passage from the Santa Monica Mountains to the Simi Hills. However, the purpose of this project is to help wildlife cross the area until a more permanent solution (i.e. overcrossing) is put in place. Components of the project include: Modification of fencing immediately adjacent to the 101 freeway on the north and south side to expand habitat areas near crossing and help reduce/eliminate mountain lion attempts to cross the freeway; Installation of irrigation; Removal of hardscape parking lot by commercial property landowner; Design and installation of native habitat at former parking lot; temporary reclaimed water irrigation for plant establishment; Restoration planting to restore habitat on both sides of the freeway in adjacent open space, in freeway encroachment areas, and at underpass shoulder areas of Liberty Canyon.

TCC-5

Due to feedback received, the project team has removed the multi-use trail from the project, and a multi-use trail will not be built as part of this project.

November 6, 2017

Ronald Kosinski
Deputy Director, Division of Environmental Planning
California Department of Transportation
District 7, Division of Environmental Planning
100 S. Main Street, MS-16A
Los Angeles, CA 90012

Via Email: liberty.canyon@dot.ca.gov

Re: Comments Liberty Canyon Crossing Project EA/MND

Dear Mr. Kosinski:

On behalf of the Calabasas Highlands Homeowners Association, thank you for the opportunity to comment on the Liberty Canyon Wildlife Crossing Project - Proposed Mitigated Negative Declaration/Environmental Assessment. We support a safe and sustainable wildlife crossing at the US-101, just west of Liberty Canyon Road, in the city of Agoura Hills. This will allow wildlife to move more freely between the Santa Monica Mountains, the Simi Hills, Santa Susana Mountains, and the Sierra Madre Mountain Range. This is so important, even more so now with the discovery of an unknown mountain lion only last week! As I'm sure you've heard from many voices, a wildlife crossing will restore and increase habitat connectivity where it has been fragmented by the 101 freeway, reduce wildlife mortality, and allow for the exchange of genetic material for our threatened mountain lions, bobcats, and other species.

We support Alternative 2, a 165 foot wide by 200 foot long bridge across the 101 plus an extension that is built over Agoura Road, as the superior Alternative for a crossing. Further, the City of Agoura Hills has clearly said that the 48 foot design option for the extension is not an option that will work for the city, so we urge you to keep that in mind.

We also believe that **tunnels should be studied as an alternative**. Constructing tunnels under freeways as a safe wildlife passage is a proven success, and may be the preferred method for cougar crossings. Yet, tunnels were not studied as an alternative in the MND, so we urge you to require them now in this Draft to make an accurate comparison in line with the other build alternatives. Also, since the funding equation has changed from the original plan, we need to re-evaluate and look at all of our options creatively in a new light.

Something else that could be addressed in this document is the short term utilization of the current Liberty Canyon underpass while the other options are being examined, and then one finalized and built, which will take years. In the initial plan, Phase I was to have been the re-vegetation of the areas leading to and beneath the freeway to aid in potential wildlife crossings.

One thing **we are against is opening up the wildlife crossing to other uses**. There are many references to recreation and recreational elements found throughout the MND/EA, but the

CHHOA-1

Thank you for your comment. Your support for the proposed project is acknowledged.

CHHOA-2

A modified version of Alternative 2 Design Option 2 has been identified as the preferred alternative. Please refer to section 1.8 Identification of a Preferred Alternative for further details.

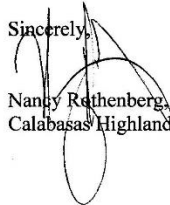
CHHOA-3

From a wildlife perspective, the best option in the West Liberty Canyon area is a wide, vegetated, wildlife overpass. Although underpasses can also work for many species, their effectiveness is heavily dependent on the openness of the structure (height x weight/length). According to Caltrans specifications, the largest culvert that can be put under the 101 Freeway by tunnel-jacking is 13x 13, which at 13x 13x300 ft. long would be long and dark with low openness, and therefore not be effective for many species, including mule deer. A larger tunnel that would provide connectivity for more species, such as 32 ft. wide by 15 ft. high tunnel, would require cut and cover construction, which would mean shutting down the 101 Freeway, which is not considered feasible.

impacts have not been studied in the assessment. The Liberty Canyon Wildlife Crossing should be for wildlife only. It should not be for horses, bicycles, tourists, groups, hikers, picnickers, etc., and all of their accompanying impacts such as noise, trash, traffic, etc., including the need to potentially build additional parking facilities, ADA access, and who knows what all. If you want wildlife to use the crossing, nothing else can. To our knowledge, no true wildlife crossing allows people. On the contrary, people are prohibited, and so should they be, legally, for this crossing.

Thank you again for this opportunity to comment on the Liberty Canyon Wildlife Crossing MND/EA.

Sincerely,


Nancy Rethenberg, President
Calabasas Highlands HOA

Two other disadvantages of tunnels is that they could not be vegetated to provide natural habitat, particularly for smaller species, and the tunnels would go only across the 101 Freeway and not across adjacent Agoura Road. A wildlife overpass over both the 101 Freeway and Agoura Road would be ideal because it would provide maximum connectivity for the full range of wildlife species, including carnivores such as mountain lions, bobcats, and coyotes, but also mule deer and smaller species like small mammals, reptiles, and amphibians that are often unwilling to cross even small roads.

A wide overpass is needed to provide effective connectivity for a range of wildlife. According to The Federal Highway Administration's Wildlife Crossing Structure Handbook (Clevenger and Huijser 2011), the recommended width is 165-230 ft. and the minimum width is 130-165 ft. 165 ft. constitutes a minimum width for effective connectivity, especially given that no structures have been built over such a wide freeway to date.

CHHOA-4

Additional discussion on the consideration of other alternatives, including underpasses and culverts, has been added to the environmental document.

CHHOA-5

Due to feedback received, the project team has removed the multi-use trail from the project, and a multi-use trail will not be built as part of this project.

November 7, 2017

Ron Kosinski
Deputy Director, California Department of Transportation
Division of Environmental Planning
100 S. Main Street, MS 16A
Los Angeles, CA 90012
via email at liberty.canyon@dot.ca.gov

Re: Public Comment for Liberty Canyon Crossing Environmental Assessment

Mr. Kosinski:

The Boeing Company supports the construction of a wildlife crossing over the Ventura Freeway (101) at Liberty Canyon with the extension of the overcrossing over Agoura Road in order to promote successful freeway wildlife crossings and increase genetic diversity.

We are committed to protecting local wildlife habitat and that's why we recently donated \$100,000 to the National Wildlife Federation to complete environmental studies and designs for a Wildlife Corridor overpass on Highway 101.

Boeing is the major landowner at the Santa Susana Field Laboratory, a 2,850-acre historic former rocket engine testing site in the Simi Hills that was proving ground for rocket engines that launched America into space and helped win the Cold War. The American Institute of Aeronautics and Astronautics identified the site as a historic aerospace site. It was occupied by Native Americans who left artifacts and pictographs; a portion of the site is included in the National Register of Historic Places.

The site sits within a vital habitat linkage that connects the inland Los Padres National Forest to the Santa Monica Mountains and the Pacific Ocean, allowing deer, bobcats, coyotes, raptors and mountain lions to roam free. It is also home to native plants and grasses, and extensive riparian oak woodlands.

A number of organizations are involved in onsite biological studies: the San Fernando Valley Audubon Society performs bird banding and counting as well as owl surveys; the Southwestern Herpetologist Society studies reptiles and amphibians; Pollinator Partnership researches pollinator populations and the Resource Conservation District of the Santa Monica Mountains performs oak tree surveys.

We recently fulfilled a long-standing commitment to preserve our land at Santa Susana as open space by entering into a conservation easement in favor of North American Land Trust. The easement ensures that almost 2,400 acres that Boeing owns is forever preserved as open space habitat for the benefit of local wildlife and neighboring communities.

Boeing is committed to a cleanup that will protect the health of any individuals who will visit the site in the future for recreational purposes and the residents in the surrounding neighborhoods. It will also protect the ecological resources that make the site a unique open space and wildlife habitat, as well as preserve the invaluable Native American cultural resources.

In other words, it will be safe for people using the site, for neighboring communities, and for the wildlife that live onsite and pass through this vital wildlife linkage. It will also preserve Santa Susana's numerous resources that make the site invaluable as open space and wildlife habitat, and of great importance to Native Americans.

Sincerely,

Kamara Sams on behalf of The Boeing Company, kamara.sams@boeing.com

BC-1

Thank you for your comment. Your support for the proposed project is acknowledged.

November 7, 2017

Ronald Kosinski
Deputy Director, Division of Environmental Planning
California Department of Transportation
District 7, Division of Environmental Planning
[100 S. Main Street](#), MS-16A
Los Angeles, CA 90012

Dear Mr. Kosinski:

Thank you for this opportunity to comment on the Liberty Canyon Wildlife Crossing MND/EA. It is greatly appreciated.

I am a strong supporter of preserving and protecting our wildlife here in the Santa Monica Mountains. I participated in the community outreach at Sheila Kuehl's office, and had brought some materials regarding tunnels with me where wildlife crossings were successful. Unfortunately, some individuals tried to shut me down during my comments. Sadly, this discouraged other community members from speaking up who shared some of my same opinions.

I support a Wildlife crossing, but one that is feasible and cost effective. Without having an EIR, all the impacts have not been studied or any of the alternatives-- for example, tunnels. Tunnels must be studied in this report, and an EIR should be done as this MND is deficient. Any project this size with these mitigatable impacts would normally automatically have an EIR, so I do not understand why this project did not. Tunnels are less expensive and more inconspicuous, so should be considered as a viable alternative to be studied in an EIR. Experts have stated tunnels are the preferred method of crossing by mountain lions, so they are effective for the safety and protection of the wildlife – the true purpose of the Wildlife Crossing. I believe tunnels will also eliminate the recreational use. Recreation has no business on or in any wildlife crossing, and keeping it reserved for the wildlife will help ensure their safety.

During this outreach meeting, I and many others were alarmed by the lack of transparency in response to community member's questions regarding the funding. Answers to all funding questions were rather non-responsive, skirting the issue, and purposely moved to change the topic. This was unsettling, so I took the initiative to make several public records requests:

- 1) The MRCA - October 11, 2017
- 2) The SMMC – October 11, 2017
- 3) RCD – October 11, 2017
- 4) Wildlife Conservation Board – October 11, 2017

Now, it appears my fears were justified as I have not received any documents in response to my request about the Liberty Canyon Crossing. They are all past due. Further, the MRCA had a board meeting on November 1, 2017 - Agenda Item VI (b) where the MRCA was reorganizing/readjusting funding over Liberty Canyon. The MRCA appeared to be requesting that the MRCA Board give the MRCA new financial authority. It appears the MRCA had time and opportunity to adjust their numbers and yet they did not have time to comply with the public records act and share the information with me! As a point of contention, what is even more disconcerting is that none of the

ES-1

Thank you for your comment. Your support for a wildlife crossing is acknowledged.

ES-2

From a wildlife perspective, the best option in the West Liberty Canyon area is a wide, vegetated, wildlife overpass. Although underpasses can also work for many species, their effectiveness is heavily dependent on the openness of the structure (height x weight/length). According to Caltrans specifications, the largest culvert that can be put under the 101 Freeway by tunnel-jacking is 13x 13, which at 13x 13x300 ft. long would be long and dark with low openness, and therefore not be effective for many species, including mule deer. A larger tunnel that would provide connectivity for more species, such as 32 ft. wide by 15 ft. high tunnel, would require cut and cover construction, which would mean shutting down the 101 Freeway, which is not considered feasible.

Two other disadvantages of tunnels is that they could not be vegetated to provide natural habitat, particularly for smaller species, and the tunnels would go only across the 101 Freeway and not across adjacent Agoura Road. A wildlife overpass over both the 101 Freeway and Agoura Road would be ideal because it would provide maximum

agencies have supplied me with any documentation regarding Liberty Canyon. The only disclosure about money I have seen was printed in the Malibu surfside news.

I believe the projected project costs for the overcrossing are unrealistic and they are only going to escalate. Please with all due respect this MND must study alternatives that are more achievable and realistic.

Respectfully yours,
Elizabeth Stephens
Community Member

The PRA's are all attached and my letter to the MRCA board members.

connectivity for the full range of wildlife species, including carnivores such as mountain lions, bobcats, and coyotes, but also mule deer and smaller species like small mammals, reptiles, and amphibians that are often unwilling to cross even small roads.

A wide overpass is needed to provide effective connectivity for a range of wildlife. According to The Federal Highway Administration's Wildlife Crossing Structure Handbook (Clevenger and Huijser 2011), the recommended width is 165-230 ft. and the minimum width is 130-165 ft. 165 ft. constitutes a minimum width for effective connectivity, especially given that no structures have been built over such a wide freeway to date.

ES-3

At this time, all funding for the proposed project is from private sources. #SaveLACougars is primarily seeking private philanthropic dollars, although public dollars earmarked for conservation have been, and will continue to be, sought. Up-to-date fundraising progress and other information is available at www.savelacougars.org.

Paul and Leah Culberg
 32063 Lobo Canyon Rd.
 Cornell, CA 91301
paul@lobocreek.com
leah@lobocreek.com

November 7, 2017

Ronald Kosinski
 Deputy Director, Division of Environmental Planning
 California Department of Transportation
 District 7, Division of Environmental Planning
 100 S. Main Street, MS-16A
 Los Angeles, CA 90012

Dear Mr. Kosinski,

Thank-you for the opportunity to comment on the Liberty Canyon Wildlife Crossing Project – Proposed Mitigated Negative Declaration/Environmental Assessment.

We support a safe and sustainable wildlife crossing at the US-101, just west of Liberty Canyon Road, in the city of Agoura Hills. This will allow wildlife to move freely once again between the Santa Monica Mountains, Simi Hills, Santa Susana Mountains, and the Sierra Madre Mountain Range. It will restore and increase habitat connectivity where it has been fragmented by the 101 freeway, reduce wildlife mortality, and allow for the exchange of genetic material for our threatened mountain lions, bobcats, and other species.

Caltrans studied only three crossing alternatives:

1. No Build Alternative
2. Alternative 1 – A 165 foot wide by 200 foot long bridge across the 101 only.
3. Alternative 2 – A 165 foot wide by 200 foot long bridge across the 101, plus an extension that is built over Agoura Road. The extension has two design options, a 48 foot wide bridge or a 54 foot wide bridge.

We support Alternative 2 because it is the superior choice for *all* wildlife, including birds, and we concur with the Santa Monica Mountains Conservancy taking no position on the design option element of 48 or 54 feet wide. Although the 48-foot design may have fewer environmental impacts, the City of Agoura Hills has clearly expressed that this is not an option that will work for the city.

PLC-1

Thank you for your comment. Your support for the proposed project is acknowledged.

A modified version of Alternative 2 Design Option 2 has been identified as the preferred alternative. Please refer to section 1.8 Identification of a Preferred Alternative for further details.

But additionally, tunnels should be studied as a less expensive alternative for this location or others deemed critical for the safety and well-being of our wildlife even though they are not an useful option for birds. Research indicates constructing tunnels under freeways and roadways for safe wildlife passage is a data-proven success, including for mountain lions. In many instances, tunnels are the preferred method for cougar crossings, yet tunnels were not studied as an alternative in the MND. Why? Adequately analyzing them should be added as a requirement now in this Draft. It is the only way to make an accurate comparison in line with the other *build* alternatives. Fundraising goals have fallen short of anticipated goals; therefore, costs and the cost of having to garner significantly more public sector dollars than originally disclosed and planned for, is a growing concern. Consequently, if tunnels were a feasible option, they would be less expensive to build and would diminish the threat of human exploitation and recreational biological impacts.

There are numerous references to recreation and recreational elements woven throughout the MND/EA, and yet recreational impacts have not been studied in the assessment! The Liberty Canyon Wildlife Crossing should be for wildlife and wildlife only, as supported by the overwhelming majority of residents at the last Wildlife Crossing meeting we attended. It should not be used by people for any sort of recreational use, which would require additional development in the form of lighting, parking facilities, ADA access, restrooms, and even sidewalks.

There is zero evidence that any wildlife crossing allows people. As a matter of fact, they are strictly prohibited in Banff National Park, which has the most numerous and varied wildlife crossing structures in the world. Even more alarming for Liberty Canyon is that it is situated in one of the largest urban population centers in the country. These potential visitors plus tourists recreating on and across the world's largest wildlife crossing would wreak havoc on this wildland area. If Caltrans and the project team want to build a people crossing for recreation, education, etc., they should build it as a separate project. It is extremely important to ensure that the Liberty Canyon Wildlife Crossing be dedicated for wildlife only in perpetuity.

Caltrans should initiate the process now of working with the National Park Service to study and produce a savvy new regional plan – one that would address the dire need of wildlife crossings under and over freeways throughout Los Angeles County – an integrated, cost effective, efficient, timely approach and execution, to ensure the survival of our most threatened wildlife species.

Thank-you again for this opportunity to comment on the Liberty Canyon Wildlife Crossing. We look forward to Caltrans addressing these questions and inadequacies in the MND/EA.

PLC-2

According to Caltrans specifications, the largest culvert that can be put under the 101 Freeway by tunnel-jacking is 13x 13, which at 13x 13x300 ft. long would be long and dark with low openness, and therefore not be effective for many species including mule deer. A bigger tunnel that would provide connectivity for more species, such as 32 ft. wide by 15 ft. high tunnel, would apparently require cut and cover construction, which means shutting down the 101 Freeway, which is not considered feasible.

Two other disadvantages of tunnels is that they could not be vegetated to provide natural habitat, particularly for smaller species, and the tunnels would go only across the I O I Freeway, and not across adjacent Agoura Road.

PLC-3

Due to feedback received, the project team has removed the multi-use trail from the project, and a multi-use trail will not be built as part of this project.

Sincerely,

Paul and Leah Culberg

PLC-4

At this time, all funding for the proposed project is from private sources. #SaveLACougars is primarily seeking private philanthropic dollars, although public dollars earmarked for conservation have been, and will continue to be, sought. Up-to-date fundraising progress and other information is available at www.savelacougars.org.

PLC-5

The South Coast Missing Linkages project has developed a comprehensive plan for a regional network that would maintain and restore critical habitat linkages between existing reserves. These linkages form the backbone of a conservation strategy for southern California. The plan is available at: <http://www.scwildlands.org/reports/SCMLRegionalReport.pdf>.

November 7th, 2017

Mr. Ronald Kosinski
Deputy Director, Division of Environmental Planning
California Department of Transportation
District 7, Division of Environmental Planning
100 S. Main Street, MS-16A
Los Angeles, CA 90012

Dear Mr. Kosinski:

The Liberty Canyon Wildlife Crossing, first imagined decades ago, has behind it a deliberate, patient approach of public land purchases and preservation of conservation open space. After many years of collective research culminating with the most recent research conducted by the National Park service gives us the irrefutable scientific basis for undertaking

There are innumerable dedicated public servants and wildlife advocates to thank for this effort. More recently, research by National Park Service scientists Seth Riley and Jeff Sikkich, along with the collective research of many others, gives us the irrefutable scientific basis for undertaking this critical project:

- The Santa Monica Mountains Cougar population isolated by the 101 Freeway to the North, and the 405 Freeway to the East; the available habitat available is far short of what is needed for their future survival.
- The “island effect” on the genetic pool on Cougars in the Santa Monica Mountains is so significant that it is predicted the viability of this isolated population will cease within 50 years.
- The 101 Freeway acts as a lethal barrier for access to the extensive open spaces and wildlands to the north, and the genetic pool it represents.
- As identified by the NPS research, the location at liberty Canyon is not just the last opportunity to connect a viable wildlife corridor in the region. NPS tracking shows that it is also a place that Cougars regular seek to cross, only to be thwarted (or killed) by the 101.
- In consultation with other wildlife crossing experts, it is clear that this project will benefit many other species as well, from Mule deer, bobcats and coyotes to birds, amphibians and reptiles.
- The Liberty Canyon Crossing Project is a last chance to use verified wildlife management practices to create a vital, sustainable and best possible solution to habitat fragmentation in the Santa Monica Mountains.

RB-1

Thank you for your comment. Your support for the proposed project is acknowledged.

This an environmental project driven by the critical ecological needs under our current crisis level habitat fragmentation under the wildlife/transportation Interface conditions. Carefully considered engineering and execution of the project to achieve the best possible solution is paramount. This effort will also serve as model for the other wildlife/transportation interface issues across the state. We now realize the importance of wildlife connectivity as essential to the future mission of Caltrans, both in retrofits at critical junctures like Liberty Canyon, and in a new definition of best practices when planning transportation projects in the future. This new direction should also serve as a model on the local and national level.

The Caltrans Project Team must take in account the established municipal and county land use plans, and the project's relationship to the local community. That is the purpose of the Environmental Review, the recent hearing at King Gillette Ranch, and this current opportunity for public comment (with further review as the project moves forward). As a former mayor and city councilmember in Santa Monica, I deeply understand and respect the importance of this process.

I support both design options in Alternative 2; the scientists and public land use experts deem both options under this alternative as acceptable. Both options provide the width necessary to maximize the viability of the crossing. The more habitat on the crossing, and isolation from the Freeway and Agoura Road, the better it will serve its purpose as an essential wildlife corridor.

The City of Agoura Hills, as the landholder of the Agoura Rd. right of way, has assessed their current and future responsibilities to their community and strongly supports alternative 2, option 1. Option 2, slightly shorter than Option 1 on its north/south span, would provide certain advantages in terms of the slope of the crossing and construction footprint. No matter which design option is adopted, I would hope the final engineering designs would find a way to address these issues and maximize the biological effectiveness of the project.

I also support a careful, scientific approach to the public use of the crossing over the freeway and Agoura Rd. We need to make sure the National Park Service is able continue its research on local wildlife to study the changes in wildlife territories and migration due to the crossing, in order to establish a baseline understanding of how this approach, studied extensively in rural conditions, functions within the urban/wildland interface. This science, I believe, should guide our future relationship between wildlife and human use of the crossing.

Sincerely,

Richard Bloom
Assemblymember, 50th District

RB-2

Caltrans has studied the Los Angeles County General Plan, City of Agoura Hills General Plan, City of Calabasas General Plan, and the Santa Monica Mountains North Area Plan to establish consistency with land use and community goals and values. Findings are discussed in section 2.1 Human Environment.

RB-3

Caltrans will continue to collaborate with the National Park Service and the Resource Conservation District of the Santa Monica Mountains throughout this phase of the project and as we continue forward with design.



"Gateway to the Santa Monica Mountains National Recreation Area"

November 8, 2017

Mr. Ron Kosinski
Deputy District Director
California Department of Transportation
Division of Environmental Planning (Liberty Canyon Wildlife Crossing Project)
100 South Main Street MS-16A
Los Angeles, CA 90012

SUBJECT: DRAFT MND FOR LIBERTY CANYON WILDLIFE CROSSING PROJECT

Dear Mr. Kosinski:

Thank you for the opportunity to review and provide comments on the Draft Initial Study Mitigated Negative Declaration/ Environmental Assessment (ISMND/EA) for the Liberty Canyon Wildlife Crossing Project in the City of Agoura Hills. We understand that the project site is located along U.S. Route 101, west of Liberty Canyon Road in the City of Agoura Hills. Aside from the "No-Build" option, the project proposes two "build" alternatives for consideration. The first alternative involves the construction of a 165-foot wide by 200-foot long bridge across U.S. Route 101, immediately west of Liberty Canyon Road. The second alternative expands the scope of Alternative 1 to include construction of a tunnel over Agoura Road, allowing for one continuous animal crossing from the north side of the 101-freeway, to the south side of Agoura Road. The project would require multiple approvals and permits, including a General Plan Amendment, vacation of existing city public right-of-way, an encroachment permit, and oak tree permit, among other things.

City staff has reviewed the document. The attached list identifies the concerns the City would like addressed.

AH-1

Thank you for your comment. Your concerns are addressed on the following pages.



"Gateway to the Santa Monica Mountains National Recreation Area"

We appreciate your consideration of these comments during the preparation of the Final MND. Please contact me at (818) 597-7353 or Associate Civil Engineer, Charmaine Yambao, should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Ramiro S. Adeva III".

Ramiro S. Adeva III
Director of Public Works/City Engineer

cc: Greg Ramirez, City Manager of Agoura Hills

Attachment: Comments on the Draft MND

Mr. Ron Kosinski
October 26, 2017
Page 3 of 25

**LIBERTY CANYON WILDLIFE HABITAT CONNECTIVITY PROJECT
INITIAL STUDY / MITIGATED NEGATIVE DECLARATION**

CITY OF AGOURA HILLS DRAFT COMMENTS

Project Description

- Needs to be expanded to include language about the proposed tunnel over Agoura Road as well, which could, among other things, include street improvements such as bike lanes, and combined pedestrian walkway/emergency bypass on the south side of the tunnel, and potential transitions within and/or immediately outside the tunnel, depending on the final design details during the Plans, Specifications, and Estimates (PS&E) phase.

CHAPTER 1 – PROPOSED PROJECT

1.1 Introduction

- Page 1 - The introduction states: “The project would also enhance safety for motorists by reducing swerving movements to avoid wildlife crossing the highway.” Please include an analysis of traffic safety for motorists on Agoura Road.
- Page 1 - Aerial image is misleading and presumptuous. It shows connection of the wildlife crossing over BOTH the US-101 freeway mainline AND Agoura Road, prior to a preferred alternative being selected. A note should be added on the page clearly stating the image shown is the proposed Alternative #2, to indicate to readers that it is merely one of multiple options.

- Page 3 - Figure 2: Mountain Ranges

Please include a map of the precise location of the wildlife corridor, with nearby streets, and adjacent land uses, and adjacent jurisdictions for more precise context. Please also include a map of the project area and size.

- Page 5 - The last paragraph of this section mentions an “Undercrossing in the City of Agoura Hills...” This text needs to be revised since the project is an Overcrossing for the 101-Freeway and Tunnel over Agoura Road.

AH-2

Section 1.7 Unique Features of Build Alternatives includes language about the proposed tunnel on Agoura Road.

AH-3

The extension of the overcrossing over Agoura Road would facilitate movement across Agoura Road for all target wildlife species and minimize the risk of wildlife mortality on Agoura Road, contrary to Build Alternative B. By providing an extension of the overcrossing over this adjacent secondary road wildlife will be able to access the open space and habitat on both sides of US-101 without the danger or detriment of having to cross an additional road. The expectation is that the crossing extension would help alleviate wildlife impacts and mortality on Agoura Road.

AH-4

Figure 1 Project Location Map has been modified.

AH-5

Figure 2 has been modified to show the precise location of the wildlife corridor.

AH-6

The use of the term “Undercrossing” is meant to describe the existing Liberty Canyon Rd. Undercrossing, which is located to the east of the proposed site for the wildlife overcrossing.

Mr. Ron Kosinski
October 26, 2017
Page 4 of 25

1.2 Purpose and Need

1.2.2 Need

Page 10 - Reference is made to "...motorists having struck and killed over a dozen mountain lions in the study area." Where exactly were those lions killed? Please include an exhibit depicting the specific number of the mountain lions killed and their approximate location relative to the proposed crossing. Were those mountain lions killed crossing the US-101 freeway mainline or Agoura Road?

1.5 Alternatives

- Pages 18 and 19 - Please provide more detail for Alternatives 1 and 2 (Options 1 & 2) descriptions, including the project sizes, dimensioned site plans, grading plans/estimated quantities of cut, fill, export, and/or import, diagrams of Agoura Road (travel lanes and bicycle lanes), design features, trails, fencing and lighting, emergency by-pass lane, etc.
- Please include a description and grading plan of the referenced retaining wall system and estimated grading quantities for the two Alternative 2 design options.
- Page 19 – Alternative 2

Figure 8 should be revised to show the 12-foot by-pass roadway on the south side of Agoura Road, at the foot of the animal crossing slope that will be required should the tunnel over Agoura Road become the preferred alternative.

Figure 9 is not an accurate preliminary depiction of an acceptable striping configuration for Agoura Road. Among other things, the striping will reflect a 4-foot painted, hatched median separating the lane in each direction, reflecting what previous discussions at PDT meetings with the project team.

It should be also noted that the preliminary renderings of the tunnel have not been considered by the City Council yet. Among other things, the visual appearance of the proposed tunnel is not inconspicuous and is not a good example of something being built to "blend" into the surrounding environment. The same can be said about the proposed crossing over the 101-freeway mainline as well.

AH-7

Section 1.2.2 Need has been revised to provide information on the specific number of mountain lions killed and their approximate location relative to the proposed crossing.

AH-8

A modified version of Alternative 2 Design Option 2 has been identified as the preferred alternative. Please refer to section 1.8 Identification of a Preferred Alternative for further details.

AH-9

The figure has been removed. A modified version of Alternative 2 Design Option 2 has been identified as the preferred alternative. Please refer to section 1.8 Identification of a Preferred Alternative for further details.

AH-10

The final design of the proposed structure will be developed in collaboration with the City of Agoura Hills.

Mr. Ron Kosinski
October 26, 2017
Page 5 of 25

1.6 Common Design Features of the Build Alternatives

- Page 20 - There is a referenced design feature that includes: "Planting vegetation on, and adjacent to, the bridge to create an extension of the surrounding wildlife habitat, and connect the crossing to the existing riparian corridor." Please identify the location of the referenced riparian corridor.

1.7 Unique Features of Build Alternatives

- Page 22 - This seems like an appropriate place to mention the agreed-upon dimensions of the tunnel. Among other things, the 18-foot vertical height and the 12-foot emergency bypass road on the south side of Agoura Road, at the foot of the proposed animal crossing slope.

1.9 Permits and Approvals Needed

- Page 22 – Under "City of Agoura Hills," there are additional items that need to be added to the already-listed Oak Tree Permit requirement. Those being, among other things:
 - General Plan Amendment
 - Encroachment Permit
 - Vacation of Public Right-of-Way
 - Traffic Control Plans
 - Grading Permit
 - Building Permit (for the tunnel structure)

Most likely aforementioned City permits/approval would hinge on receiving prior approvals from any/other affected utilities/agencies (ie: Southern California Edison, Las Virgenes Municipal Water, etc).

CHAPTER 2 - AFFECTED ENVIRONMENT, ENVIRONMENTAL CONSEQUENCES, AND AVOIDANCE, MINIMIZATION, AND/MITIGATION MEASURES

- Scenic Resource Evaluation and Visual Impact Assessment
 - Please include as an appendix the referenced Visual Impact Assessment memorandum prepared on August 9, 2017.

AH-11

The referenced riparian corridor is shown in Figure 24.

AH-12

A modified version of Alternative 2 Design Option 2 has been identified as the preferred alternative. Please refer to section 1.8 Identification of a Preferred Alternative for further details.

AH-13

Section 1.9 has been revised to include the identified permits and approvals.

AH-14

The associated studies and technical reports are available upon request.

Mr. Ron Kosinski
October 26, 2017
Page 6 of 25

- The last underlined sentence midway through the page states, "...the build alternatives would have substantially similar effects."

This statement is not true. The disturbance and footprint of Alternative 2 is significantly more than Alternative 1 due to the amount of grading/construction that will need to occur to build a tunnel over Agoura Road. Among other things, there is a substantial difference in impact visually and to the right-of-way between the two alternatives. Additionally the temporary impact to traffic would be different if the foot of the slope is located on the north side of Agoura Road, or the south side of Agoura Road in the case of the tunnel option for Alternative 2. There should be discussion speaking to this difference in impact to traffic based on whether Alternative 1 or 2 is chosen/constructed.

2.1 Human Environment

2.1.1 Land Use and Planning

- *Affected Environment* - Please include as an appendix the referenced Community Impact Assessment prepared in August 2017.

- Existing and Future Land Use

Please include a map of the precise location of the wildlife corridor, with nearby streets, and adjacent land uses, and adjacent jurisdictions for more precise context. Please also include a map of the project area and size.

- Page 25 - The Santa Monica Mountains North Planning Area analysis, states the planning area includes *Agoura*. [italics added] Please clarify that this planning area does not include the City of Agoura Hills. It is also stated: "The Santa Monica Mountains North Area Plan guides the land use for the unincorporated areas of the *City* in the study area." Please change word "City," to "County," as the City of Agoura Hills is not in the Santa Monica Mountains North Planning Area.
- Page 31 - Figure 12 (City of Agoura Hills General Plan Land Use Designations), is a map of the City of Agoura Hills "Community Districts and Subareas" (City of Agoura Hills General Plan Update Figure LU-3). Please substitute this

AH-15

A modified version of Alternative 2 Design Option 2 has been identified as the preferred alternative.

AH-16

The associated studies and technical reports are available upon request.

AH-17

Figure 11 has been modified to show the precise location of the wildlife corridor.

AH-18

The Santa Monica Mountains North Planning Area discussion in Section 2.1.1 Land Use and Planning has been revised for clarification.

AH-19

Figure 12 has been modified to fulfill the request.

Mr. Ron Kosinski
October 26, 2017
Page 7 of 25

Figure with City of Agoura Hills General Plan Update Figure LU-2 – “Land Use Diagram”.

- Page 37; 2.1.1.1 Consistency with State, Regional, and Local Plans and Programs

Page 43 - The City of Agoura Hills General Plan “Community Conservation and Development” Element is incorrectly referenced as “Land Use and Community Form (LU)” Element.

- Page 43 – City of Agoura Hills General Plan (Policy LU-4.8 Connectivity)

This policy mentions the need to “promote the development of complete pedestrian, bicycle, and vehicular connections that provide access from all residential neighborhoods to commercial, employment, cultural, civic, recreational, and open space destinations.”

This statement is in line with the City’s “Complete Streets” policy. However, the 54-foot tunnel option is the only one that can fully meet this requirement. The 48-foot tunnel option eliminates needed space on the north side of the tunnel from being available in the future for pedestrian connectivity. Pedestrians currently jog and walk on both sides of Agoura Road, and so ensuring there is ample space to continue to do so through the tunnel is critical.

- Page 44 - The City of Agoura Hills General Plan “Infrastructure and Community Services Element” is incorrectly referenced as “Community Services (CS) Element.” Please also include the following City of Agoura Hills General Plan goals to this section:

M-1.1: Safety
M-1.2: Collision Monitoring
M-1.3: Level of Service Standards
M-1-4: Roadway Improvements
M-2.1: Complete Streets

- Page 45 – Policy NR-3.2 View Protection

This states “Preserve the hillside backdrop and natural landforms visible from the scenic roads in their *present* state to the extent possible.”

AH-20

The heading for relevant policies that fall under the Community Conservation and Development element of the City of Agoura Hills General Plan has been corrected.

AH-21

A modified version of Alternative 2 Design Option 2 has been identified as the preferred alternative. Please refer to section 1.8 Identification of a Preferred Alternative for further details. The final design of the proposed improvements will be developed in collaboration with the City of Agoura Hills.

AH-22

Due to feedback received, the project team has removed the recreational trail from the project, and a recreational trail will not be built as part of this project.

The heading for relevant policies that fall under the Infrastructure and Community Services element of the City of Agoura Hills General Plan has been corrected. Also, the identified goals have been added to the section.

AH-23

The Scenic Resource Evaluation and Visual Impact Assessment concluded that the proposed project will have minimal visual impact, and will have minimal changes to the visual character of the area. Minimization measures would include the use of native plants to match the existing vegetation, and contour grading/slope rounding to help integrate the proposed vegetated bridge within its surrounding environment.

Mr. Ron Kosinski
October 26, 2017
Page 8 of 25

The building of a tunnel over Agoura Road (and over the 101) will permanently block the visible scenery in its present state. Further study must be conducted.

- Page 49 - The No Build Alternative analysis states: "...it would not be inconsistent with or meet the objects, goals and policies of state, local and regional plans because it would not advance the open space, conservation, and recreation goals of the plans." Please clarify how the No Build Alternative would potentially impact open space, conservation, and recreation goals of local and regional plans. Please also consider compliance with the mobility goals and policies of the City of Agoura Hills General Plan Infrastructure and Community Services Element.

The "Build Alternatives 1 and 2 - The Consistency with Local Plans" analysis states the build alternatives are consistent with the City of Agoura Hills General Plan, but does not include an analysis of the mobility goals and policies of the City of Agoura Hills General Plan Infrastructure and Community Services Element, and whether it would be consistent with Safety and Complete Streets goals and policies. Please include this analysis.

- Page 50 - The "Mountain Recreation and Conservation Authority" (MRCA) is incorrectly identified as "Mountain Resource and Conservation Authority."

Under "Consistency with Local Plans," the document mentions a "multi-use" trail on the overcrossing, which will "expand the bicycle network in the region," yet does not detail how these "multi-use" trails will connect to the existing bike lanes on Agoura Road.

Please provide an exhibit/text to add clarity to this point. This section also neglects to include details of the bicycle lanes within the tunnel. Please provide an exhibit or figure for that as well.

2.1.2 Growth

The Affected Environment section states: "The region of the Santa Monica Mountains Planning Area within the project area includes the City of Agoura Hills, the City of Calabasas, and the unincorporated *City of Agoura Hills*." [italics added] Please clarify that the incorporated area is within the County of Los Angeles, and not within the City of Agoura Hills.

AH-24

The Environmental Consequences discussion in section 2.1.1.1 Consistency with State, Regional, and Local Plans and Programs has been revised for clarification on the potential effects associated with the No Build Alternative, and to include further analysis for the Build Alternatives.

AH-25

Section 2.1.1.2 Parks and Recreational Facilities has been revised to correctly identify the Mountain Resource and Conservation Authority (MRCA).

AH-26

Due to feedback received, the project team has removed the recreational trail from the project, and a recreational trail will not be built as part of this project.

AH-27

Section 2.1.2 Growth has been revised to clarify that the incorporated area is within the County of Los Angeles.

Mr. Ron Kosinski
October 26, 2017
Page 9 of 25

Do you mean the unincorporated area?

- Page 57 – Build Alternatives 1 and 2

The text implies that the project will definitively have no changes to the roadway in its current state. It is too early to be making that statement. As an example, the current striping configuration has a single double-yellow stripe separating the eastbound and westbound traffic. However, as the text outlines, the new striping configuration will incorporate a 4-foot median into the cross section, and that may require striping transitions for vehicular and bike lanes through the tunnel to meet up with existing lane configurations that will remain unchanged on either side of the tunnel. There is no mention of growth inducing impacts from the increase of visitors to the area resulting from Build Alternatives 1 and 2.

The impacts of traffic, parking and visitors to the adjacent roadways, commercial and residential areas must be analyzed.

Additionally, as has been suggested in previous PDT meetings with the project team and City staff, there still remains the possibility that the ultimate alignment of the roadway may need to be shifted slightly in order to achieve the most desirable slope for the animals to use (<3:1). If any geometric changes are made to the roadway alignment, those would definitely result in a City evaluation of what improvements would be required to ensure a safe City road.

The City feels it is too early to be making definitive statements concerning ultimate roadway geometrics, when so much is still left to be determined during the upcoming final design phase, PS&E. In light of this, the City reserves all rights to make revisions as necessary to ensure any final improvements done to, or over, Agoura Road, are done to the sole satisfaction of the City.

2.1.3 Community Impacts

- Page 58 - Please include as an appendix the referenced Community Impact Assessment prepared in August 2017.

2.1.3.1 Community Character and Cohesion

AH-28

Due to feedback received, the project team has removed the recreational trail from the project, and a recreational trail will not be built as part of this project. As a result, it is anticipated that the increase in visitors to the area would be minimal and would not result in adverse effects related to traffic, parking and visitors to the adjacent roadways, and commercial and residential areas.

AH-29

A modified version of Alternative 2 Design Option 2 has been identified as the preferred alternative. Please refer to section 1.8 Identification of a Preferred Alternative for further details.

AH-30

The associated studies and technical reports are available upon request.

AH-31

A footnote has been added to the Affected Environment discussion in section 2.1.3.1 Community Character and Cohesion to cite the referenced Los Angeles County document. Also, the Communities discussion has been revised to accurately describe the area.

Mr. Ron Kosinski
October 26, 2017
Page 10 of 25

- Page 59

The document lists Agoura as an “unincorporated community” for annual report of 2009-2010. This is incorrect. The description of the affected area is also incorrect. There are areas that have sidewalk, streetlights and bike lanes. Not all areas are unimproved.

The Indian Hills and Southeast Ridge Areas are incorrectly designated as being in the “Restricted Open Space” land use district. These neighborhoods are in the City of Agoura Hills “Open Space-Restricted” and “Residential-Single Family” land use districts.

- Page 60 - Within the Permanent Impacts analysis, please address aesthetic effects of a bridge over Agoura Road as further urbanization of a semi-rural area.

Can we change the aesthetic effects of bridges over the 101 and over Agoura Road?

- Page 61

Within the Avoidance, Minimization, and Mitigation Measures analysis, please clarify how “the project will be closely coordinated with other projects in the area.” Please identify the methods and goals of this coordination, as well as clarification of whether traffic lanes on Agoura Road will remain open at all times. Please also clarify which entity would approve the Traffic Management Plan (TMP).

Alternative 1 was thought to have no ROW acquisition from the City.

A Traffic Management Plan is called out for the 101-Freeway, but not for Agoura Road. A Traffic Management Plan will be needed for Agoura Road as well.

AH-32

The Scenic Resource Evaluation and Visual Impact Assessment concluded that the proposed project will have minimal visual impact, and will have minimal changes to the visual character of the area. Minimization measures would include the use of native plants to match the existing vegetation, and contour grading/slope rounding to help integrate the proposed vegetated bridge within its surrounding environment. The intent of the measures above would be to reduce the urbanizing effect of the project and lessen changes to the visual character of the area.

AH-33

The goal of the proposed coordination is to ensure that adequate capacity remains available to accommodate the anticipated travel demand within the corridor by not implementing work zones on adjacent or parallel highways at the same time. This may entail communicating information about the timing of lane closures and coordinating diversion routes. Construction staging can be used to remove work at the same location or traffic control conflicts between adjacent projects.

AH-34

Both build alternatives would require right-of-way acquisition from the MRCS and the City of Agoura Hills.

AH-35

Section 2.1.3.1 Community Character and Cohesion has been revised to clarify that a Traffic Management Plan will also be developed for Agoura Road.

Mr. Ron Kosinski
October 26, 2017
Page 11 of 25

- Page 65 – 2.1.4 Utilities/Emergency Services

There are significant mitigation measures for utilities with the Build Alternative 2. This section seems to minimize the impact that either Build alternatives would have on the existing utilities. One example, Transmission poles.

- Pages 66 and 67 - 2.1.5 Traffic and Transportation/Pedestrian and Bicycle Facilities

The document incorrectly states that “there are no designated bike lane or path on Agoura Road.” There are existing bike lanes on both sides of Agoura Road.

The “multi-use” trail is mentioned once again within this section to point out enhancements/beneficial use to bicyclists and pedestrians. However, no mention of the wider bike lanes in tunnel or combined pedestrian/emergency bypass on the south side of tunnel.

The document also states that temporary impacts to traffic on Agoura Road “may” occur. Traffic Impacts “will” occur and need to be studied. This section also mentions night construction, in order to minimize travel delay. Assumption is for on the freeway, but again nothing specific about Agoura Road. This section also states “no detour” is anticipated, but this assumed for the 101-freeway. From the construction standards, there will definitely be a need to detour from Agoura Road when filling in this area if Alternative 2 is selected.

- Page 66 – Affected Environment – *Existing Transit Service*

It states that “within the project limits, there are no designated bike lanes or paths on Agoura Road.” However, there is a bike path on this portion of Agoura Road and the Agoura Hills General Plan identifies a Class II bike facility on Agoura Road through the project area. Please include this correction in the analysis.

- Page 67 – Environmental Consequences (Traffic and Transportation/Pedestrian and Bicycle Facilities)

AH-36

Measures listed in the Avoidance, Minimization, and/or Mitigation Measures discussion of section 2.1.4 Utility/Emergency Services are included to avoid or minimize potential impacts associated with utility relocation, including transmission poles.

AH-37

Section 2.1.5 Traffic and Transportation/Pedestrian and Bicycle Facilities has been revised to indicate that bicycle lanes are provided on both sides of Agoura Road between the western city limit and Liberty Canyon Road.

AH-38

The Avoidance, Minimization, and Mitigation Measures discussion in section 2.1.4 Utilities/Emergency Services has been revised to clarify that a Traffic Management Plan will also be developed for Agoura Road.

AH-39

Section 2.1.5 Traffic and Transportation/Pedestrian and Bicycle Facilities has been revised to indicate that bicycle lanes are provided on both sides of Agoura Road between the western city limit and Liberty Canyon Road. The section has also been revised to indicate that Agoura Road is a Class II facility within the project limits.

Mr. Ron Kosinski
October 26, 2017
Page 12 of 25

Please clarify how a new overcrossing would affect a Class II bike path on Agoura Road. Please make particular note that the City of Agoura Hills' approval will be required for the Transportation Management Plan if either Building Alternative 1 or 2 were selected.

2.1.6 Cultural Resources – *Regulatory Setting*

- Page 69 - Please include as appendices the referenced Historic Property Survey Report (HPSR) and the Archaeology Survey Report (ASR), that were completed and signed on July 27, 2017.
- Page 70 – and it is noted that "...monitoring is not required as the project has a low potential for affecting cultural resources." Please clarify why monitoring should not occur during grading activity, in the event undetected cultural resources are found.

2.2 Physical Environment

- Page 76 – Environmental Consequence (Water Quality and Storm Water Runoff)

The text states, "The risk level associated with construction is anticipated to be low."

How can this statement be true, when the expected grading required by the proposed Alternative 2, which would build a tunnel over Agoura Road, would require significant grading and changes to the existing topography, which would have drainage impacts, among other things?

What are the estimated grading quantities? How much cut, fill, export or import?

- Page 77 – Avoidance, Minimization, and/or Mitigation Measures

Reference is made to Figure 24 as a map depicting the drainages, however, Figure 24 is titled, "Arroyo Willow Thicket." Where is the correct figure showing the drainages that is referenced on page 77?

The bullet points listed after the opening paragraph to this section are hard to follow without the correct figure to reference.

AH-40

The Environmental Consequences discussion in Section 2.1.5 Traffic and Transportation/Pedestrian and Bicycle Facilities has been revised for clarification.

AH-41

The associated studies and technical reports are available upon request.

AH-42

No monitoring is required because the potential for encountering cultural resources within the project area during construction is relatively low. This assessment is based on the results of the cultural studies conducted for the project. However, in the rare case that construction crews uncover previously undetected cultural deposits, Caltrans' policy is that work be halted in that area until a qualified archaeologist can assess the significance of the find. This assessment would include the need for monitoring thereafter.

AH-43

All appropriate Stormwater and Erosion Best Management Practices will be incorporated into the project specifications.

AH-44

The correct figure has been added to Figure 24.

Mr. Ron Kosinski
October 26, 2017
Page 13 of 25

2.2.2. Geology/Soils/Seismic/Topography

- Page 78 - Please include as an appendix the referenced Structure Geotechnical Report, prepared on March 20, 2015.
- Page 79 - The Ground Rupture analysis states: "...no known fault passes through or extends towards the project site..." Please include an analysis of potential seismic shaking from the active region.

2.2.4 Air Quality

- Page 84 - Under "*Affected Environment*", the document discusses changes to traffic volumes and other factors for the 101-freeway, but does not discuss possible changes to the traffic volumes, facilities (parking lots) on Agoura Road. The impact of a possible "multi-use" trail on Agoura Road could range from increase traffic volumes, parking, etc.

Please address the impact a "multi-use" trail would have on Agoura Road.

- Page 87 - Under "*Construction (Short-Term) Impacts*", again one assumes these short term construction impacts are only analyzed for the 101-freeway, but what about Agoura Road? The massive amount of grading on and around Agoura Road must be analyzed.
- Page 89 – Table 5. Build Alternative 1 Road Construction Emission Model
Table is too small. Please include bigger fold-outs for all figures, exhibits, tables, etc. in the MND document so they are fully legible.
- Page 95 - notes that "Build Alternative 1 and 2, therefore, must comply with SCAQMD Dust Implementation Rule 403 to minimize temporary emissions during construction of the project as applicable and appropriate minimization measures, as applicable, *should* be implemented during construction activities in accordance with Caltrans' Standard Specifications and local ordinances." [italics added] Please include the implementation of minimization measures as a requirement.

AH-45

The associated studies and technical reports are available upon request.

AH-46

Section 2.2.2 Geology/Soils/Seismic/Topography has been revised to include analysis of potential seismic shaking.

AH-47

Due to feedback received, the project team has removed the recreational trail from the project, and a recreational trail will not be built as part of this project.

AH-48

All proposed construction activities, including grading and filling the slope between the proposed bridge abutment and Agoura Road, as well as constructing a tunnel and associated retaining wall system along Agoura Road, were analyzed as part of the Air Quality Assessment.

AH-49

The final environmental document is available in electronic format at <http://www.dot.ca.gov/d7/env-docs/>.

AH-50

The Avoidance, Minimization, and/or Mitigation Measures discussion in section 2.2.4 Air Quality has been revised to clarify the requirements of proposed minimization measures.

AH-51

The Affected Environment discussion in section 2.2.5 Noise has been revised with correct reference.

Mr. Ron Kosinski
October 26, 2017
Page 14 of 25

2.2.5 Noise

- Page 98 - "Rondell Condominiums Homeowners Association" is incorrectly referenced as "Rodell Condo Owners Association."
- Page 98 - It is stated that "No human noise sensitive uses were identified in the immediate project area." On page 99, it is stated that "...there are no impacted human receptors in the vicinity of the study area..." On page 113 it is stated that "Based on the studies so far conducted, it has been determined that the wildlife area will experience significant noise increase during the construction phase of the project." Please analyze noise impacts to residents in the vicinity of the project. There are residential neighbors on the south side of Agoura Road, west of the project site, and at the southwest corner of Agoura Road and Liberty Canyon Road. Please include within the noise impact analysis the noise resulting from construction and use of the Agoura Road tunnel.
- Page 99 states that "With the build alternatives, there may be some localized increases in noise as a result of construction activities such as grading." On page 113 it is stated that "...noise levels generated during construction shall comply with applicable local, state and federal regulations." The City of Agoura Hills has required construction hours to limit noise impacts (7:00 a.m.–7:00 p.m., Monday through Saturday. No construction is allowed on Sundays or holidays). Please clarify adherence to these local construction hours.
- Page 101 - Please include for Figure 16 (Measurement Sites Location) map, noise measurement monitoring in the existing residential community at the southwest corner of Agoura Road and Liberty Canyon Road.
- Pages 103-107 - Figures 17, 18 and 19 are not legible. Please provide larger sized maps.
- Page 114 - It is stated that "Site restrictions *should* be applied to achieve noise reduction through different methods, resulting in an immediate reduction of noise emitted to the community without requiring any modification to the source noise emissions." [italics added] Please require these site restrictions, or clarify why they should not be required.

AH-52

The proposed project is not a capacity increasing project and it is not anticipated to result in traffic noise increase.

The nearest residential location is 700 feet away from project construction site. Normally, construction noise levels should not exceed 86 dBA at a distance of 50 feet from 9 p.m. to 6 a.m. Noise produced by construction equipment would be reduced over distance at a rate of about 6 dBA per doubling of distance. No adverse noise impacts from construction are anticipated because construction would be conducted in accordance with Caltrans standard specifications and would be short-term and intermittent.

AH-53

The Avoidance, Minimization, and/or Mitigation Measures discussion in section 2.2.5 Noise has been revised to clarify requirements of City of Agoura Hills noise regulations.

AH-54

See AH-52.

AH-55

The final environmental document is available in electronic format at <http://www.dot.ca.gov/d7/env-docs/>.

AH-56

The Avoidance, Minimization, and/or Mitigation Measures discussion in section 2.2.5 Noise has been revised to clarify the requirements of proposed minimization measures.

Mr. Ron Kosinski
October 26, 2017
Page 15 of 25

2.3 Biological Environment

2.3.1 Natural Communities

- Page 116 states that “The focus of this section is on biological communities, not individual plant or animal species.” Please assess impacts to individual plant and animal species, or clarify why potential impacts to individual plant and animal species are not included.
- Page 117 - Please clarify the type of habitat that is intended to be identified within the boundary area shown in Figure 21.
- Page 121 - It is stated that “A full oak inventory needs to be completed once an alternative has been selected and the project footprint is finalized.” Please provide an oak tree report for use in assessment of the project, per CEQA. An oak tree permit from the City of Agoura Hills will be required. Oak tree impacts within the City of Agoura Hills boundary need to be assessed per City of Agoura Hills Oak Tree Preservation Guidelines Ordinance.
- It is stated on page 122 that “No permanent impacts to oaks with a DBH of 36 inches or higher is anticipated.” Page 123 states that “Temporary impacts are anticipated to include impacts to 1 individual oak tree with a DBH greater than 36 inches.” The City of Agoura Hills requires an oak tree permit for removal or encroachment of oak trees with a trunk diameter of greater than two inches. Please identify these impacted oak trees.
- Page 122 states that “Though it is anticipated that the proposed project will impact oak woodlands within the BSA, the proposed project is not expected to alter the composition of the woodland or jeopardize the continued existence of the woodland.” Please provide an assessment to support this conclusion.
- Page 124 - Within the analysis for Build Alternative 2, please include the City of Agoura Hills requirement for an oak tree permit to remove oak trees with trunk diameters greater than two inches, or to encroach within their protected zones.
- Page 125 - Within the avoidance, minimization and/or mitigation measures for Build Alternatives 1 and 2, please include the need for an oak tree permit from

AH-57

Potential impacts to individual plant and animal species are discussed in section 2.3.4 Plant Species, section 2.3.5 Animal Species, and section 2.3.6 Threatened and Endangered Species.

AH-58

Figure 21 has been modified to clarify the type of habitat.

AH-59

[A full oak inventory](#) will be undertaken during the final design phase of the project. An oak tree report by a city-approved oak tree consultant will be prepared and submitted once the oak tree permit process is initiated.

AH-60

The Environmental Consequences discussion in section 2.3.1 Natural Communities has been revised to include the assessment which supports the conclusion for potential impacts to oak woodlands.

AH-61

Please see **AH-59**.

AH-62

The Avoidance, Minimization, and/or Mitigation Measures discussion in section 2.3.1 Natural Communities has been revised to indicate that the proposed project will comply with the Oak Tree Preservation ordinance by following the Oak Tree Permit process.

AH-63

Mr. Ron Kosinski
October 26, 2017
Page 16 of 25

the City of Agoura Hills. It is stated that: "The proposed project will comply with the City of Agoura Hills Oak Tree Preservation Ordinance and Oak Tree Permits will be obtained for all trees outside of Caltrans right-of-way." Please clarify how the project complies with the City ordinance, and that the required oak tree permit from the City of Agoura Hills will require discretionary action, not ministerial action. Please incorporate within the mitigation measures for Build Alternatives 1 and 2 the City of Agoura Hills standard protection measures and specific conditions of the required oak tree permit.

- Page 126 - Mitigation measures for Build Alternatives 1 and 2 state that "The landscape plan for these areas will be developed in coordination with the District Biologist, SMMC, and NPS to insure that the placement of vegetation is appropriate for both the valley oak woodland composition and for wildlife movement." If impacts are identified within the City of Agoura Hills, the City of Agoura Hills requests to be included in the development and coordination of the landscape plan.

Please require approval from the City of Agoura Hills for on-site and off-site compensatory mitigation of oak woodlands (ref. page 126). It is requested that the recommended minimum compensatory mitigation ratios reflect requirements of City of Agoura Hills Oak Tree Preservation Guidelines Ordinance.

- Page 133 states that "While there are three arroyo thickets present within the BSA the proposed project is not anticipated to permanently impact the thickets and the potential for temporary impacts from construction in areas adjacent to the creek will be avoided and minimized." Please clarify how the temporary impacts from construction in areas adjacent to the creek will be avoided and minimized.
- Page 134 - The mitigation measures state: "It is *recommended* that habitat buffers along the stream and riparian corridor are put in place in order to confine and delineate the work area." [italics added] Please require the placement of habit buffers for this mitigation measure.
- Page 135 - The mitigation measures state: "It is recommended that the potential access road within AWT 2 be relocated to avoid impacts to arroyo willow thicket habitat if feasible. If it is not feasible to relocate the access road then the

The Avoidance, Minimization, and/or Mitigation Measures discussion in section 2.3.1 Natural Communities has been revised to indicate that the City of Agoura Hills will be included in the development and coordination of landscape plans for impacts identified within city jurisdiction.

AH-64

On-site restoration of all temporarily impacted oak woodlands and on-site compensation for all permanently impacted oak trees will be required to mitigate for impacts to valley oak woodlands. All compensatory mitigation required is proposed to be completed on-site but if sufficient space is not available, off-site mitigation within the Santa Monica Mountains will be implemented. All oak woodland habitat and trees that are permanently impacted by the proposed project will be mitigated with the creation and/or restoration of oak woodland habitat. Final mitigation ratios will be determined in coordination with CDFW and the City of Agoura Hills under the respective agreements and permits issued for the project.

AH-65

The potential temporary impacts from construction in areas adjacent to the creek will be avoided and minimized with implementation of the measures listed in the Avoidance and Minimization and/or Mitigation Measures discussion for potential environmental consequences to arroyo willow thicket. Please refer to section 2.3.1 Natural Communities.

AH-66

The Avoidance, Minimization, and/or Mitigation Measures discussion in section 2.3.1 Natural

Mr. Ron Kosinski
October 26, 2017
Page 17 of 25

roadway width and clearing and grubbing *should* be minimized.” [italics added]
Please require compliance with this mitigation measure, while allowing for roadway width approved by the City of Agoura Hills.

- Page 135 - The mitigation measures for arroyo thicket habitat impacts state, “The landscape plan for these areas will be developed in coordination with the District Biologist, SMMC, and NPS to insure that the placement of vegetation is appropriate bot both the arroyo willow composition and for wildlife movement.” If impacts are identified within the City of Agoura Hills, please include the City of Agoura Hills in the development and coordination of the landscape plan.

- Page 137 - Please include the defined grading areas for Alternative 1 in Figure 25 (Project Impact Areas).

Please include estimated earthwork/grading quantities for the various alternatives.

2.3.2 Wetlands and Other Waters

- Please clearly show the jurisdictional area limits in Figure 27 (Preliminary Jurisdictional Determination Aerial Photograph).
- Page 151 - It is requested that the Compensatory Mitigation Measures not be deferred. Please provide an analysis of the permanent impacts for each project alternative.

2.3.3 Wildlife Corridors

- Page 154 states that “Though some species are anticipated to be capable of crossing Agoura Road in its current configuration, it should be noted that Agoura Road poses a mortality risk to all species.” Please clarify whether Build Alternative 1 will result in target species dying, as it is noted that “Build Alternative 1 is not anticipated to serve all target species...”

Communities has been revised to require the placement of habitat buffers.

AH-67

The Avoidance, Minimization, and/or Mitigation Measures discussion in section 2.3.1 Natural Communities has been revised to require minimal roadway width and clearing/grubbing, as well as City of Agoura Hills approval, in the event that the potential access road within Arroyo Willow Thicket 2 (AWT 2).

AH-68

The Avoidance, Minimization, and/or Mitigation Measures discussion in section 2.3.1 Natural Communities has been revised to indicate that the City of Agoura Hills will be included in the development and coordination of landscape plans for impacts identified within city jurisdiction.

AH-69

A modified version of Alternative 2 Design Option 2 has been identified as the preferred alternative. Please refer to section 1.8 Identification of a Preferred Alternative for further details.

AH-70

Figure 27 has been revised to show the jurisdictional limits.

AH-71

The Compensatory Mitigation discussion in section 2.3.2 Wetlands and Other Waters has been revised to clarify analysis of permanent impacts.

AH-72

Mr. Ron Kosinski
October 26, 2017
Page 18 of 25

- Page 158 – Alternative 2, Design Option 2

A bridge is referenced in Alternative 2-Design Option 2. Please clarify which bridge is being referenced. Please also provide the required slope for Design Option 1.

- Page 158 – Alternative 2, Design Option 1 and Design Option 2

BOTH options need to call out the requirement to construct the concrete or asphalt by-pass road on the south side of Agoura Road. This was a critical piece to the City being on board with accepting a tunnel cross section of 54-feet, which is 6-feet less than the current existing city right-of-way of 60-feet.

Any exhibits and or renderings depicting the tunnel over Agoura Road, should be adjusted to show the required by-pass road as well running parallel to the creek at the foot of the proposed Wildlife Crossing slope on the south side of Agoura Road.

The text included with Design Alternative 2, Design Option 2 states, “This design option is not as ideal for wildlife crossing as compared to Alternative 2 – Design Option 1.” This statement should be deleted since it is biased and opinionated, and leads the reader to favor one option over the other.

The City remains steadfast on its stance that has been conveyed to the project team on multiple occasions, that being the 54-foot option is the City’s preferred alternative, and the only option that staff will be recommending to the City Council for approval. The project team previously reported to City staff that the minimal slope of 3:1 could be achieved with the 54-foot option. Therefore, both options are viable and able to achieve the minimal desired slope for animal crossings. The text should be revised to reflect that point, rather than stating one option is more ideal than the other.

- Page 159 - states that “It is recommend that the vertical clearance of the freeway and Agoura road be minimized at the overcrossing structure location to minimize the overall height of the overcrossing structure and maintain sightlines.” Please analyze traffic safety for the overcrossing structure and clarify if the referenced vertical clearance is a recommendation or a requirement.
- Page 160 states that “*Non-vegetated cover* will be placed on the overcrossing structure to minimize exposure for cover obligate species while crossing and to

A modified version of Alternative 2 Design Option 2 has been identified as the preferred alternative.

AH-73

The Environmental Consequences discussion for Alternative 2-Design Option 2 in section 2.3.3 Wildlife Corridors has been revised for clarification.

AH-74

A modified version of Alternative 2 Design Option 2 has been identified as the preferred alternative. Please refer to section 1.8 Identification of a Preferred Alternative for further details.

AH-75

The statement has been removed.

AH-76

The City of Agoura Hills preference for Alternative 2 Design Option 2 is acknowledged. Section 2.3.3 Wildlife Corridors has been revised to indicate that the minimal slope of 3:1 can be achieved with Alternative 2 Design Option 2.

AH-77

A modified version of Alternative 2 Design Option 2 has been identified as the preferred alternative. Please refer to section 1.8 Identification of a Preferred Alternative for further details.

AH-78

The material to be used as non-vegetated cover will be determined during the final design phase.

Mr. Ron Kosinski
October 26, 2017
Page 19 of 25

provide landing spots for aerial species.” [italics added] Please clarify the material to be used as “non-vegetated cover.”

- Page 160 - The requirement for wildlife fencing and escape ramps are referenced. Please analyze traffic safety for this requirement.
- Page 166-167 states that Build Alternatives 1 and 2 would result in “a decrease or no change in wildlife mortality on Agoura Road” and “the wildlife overcrossing and associated wildlife fencing is anticipated to reduce the risk of animal-vehicle related mortality in regards to drivers as well as wildlife.” Please clarify whether Alternative 1, which would require wildlife to cross Agoura Road, would increase wildlife mortality.

2.3.4 Plant Species

- Please identify the dates on which the specific plant species surveys were taken.
- Page 170 notes that the round-leaved filaree was not found during vegetation surveys, but has a moderate potential to occur within the BSA. Please provide the date of the survey and clarify whether the survey was taken before, during or after the rain season.
- Page 171 states that neither direct nor indirect impacts to the Ojai navarretia species are expected as the species was not observed within the BSA. As the species has been found on the south side of Agoura Road, west of the project site and within the City of Agoura Hills, it should not be entirely dismissed from this area. There is moderate potential for its presence within the BSA.
- Page 171 states that “If round-leaved filaree, slender mariposa-lily and ojai navarretia are found during focused rare plant surveys, avoidance and minimization measures will be implemented” and “If many-stemmed dudleya, San Fernando Spineflower and Mesa horkelia [are] found during focused rare plant surveys, avoidance and minimization measures will be implemented.” Please clarify when the rare plant surveys will be conducted, and please provide a list of the required mitigation measures.
- Page 171 - The conclusion that compensatory mitigation is not necessary for round-leaved filaree, slender mariposa-lily and Ojai navarretia differs from the

AH-79

Wildlife fencing and escape ramps will be constructed outside of the traveled way. An area cleared of fixed objects adjacent to the traveled way is desirable to provide a clear recovery zone (CRZ) for vehicles that leave the traveled way. The final location of wildlife fencing and escape ramps will be determined during the final design phase following the Caltrans Highway Design Manual and Traffic Safety Systems Guidance.

AH-80

A modified version of Alternative 2 Design Option 2 has been identified as the preferred alternative.

AH-81

Vegetation surveys were done on April 28, 2016.

AH-82

As indicated in the Environmental Consequences discussion in section 2.3.4 Plant Species, [there is the potential for Ojai navarretia \(Navarretia ojaiensis\) to occur within the BSA.](#)

AH-83

Focused plant surveys will take place in the spring season (after the rainy season) prior to construction. Two years of surveys will be considered if drought conditions worsen. Mitigation measures will be created in collaboration with CDFW if special status plants are found during rare plant/focused surveys.

Mr. Ron Kosinski
October 26, 2017
Page 20 of 25

conclusions on this same page that call for focused rare plant surveys, and the implementation of avoidance and minimization measures. Please clarify this discrepancy.

2.5 Construction Impacts

- Page 198 - This document seems to minimize the impacts on the existing utilities. There are transmission and distribution lines for power affected. Although temporary, the impacts are not simple or minimal. Also, the document mentions drainage facilities that may need to be modified or relocated, however, previous discussions with the project team gave the impression that the footprint of the tunnel was set so that existing drainage facilities would not require modification, which could trigger additional environmental impact reports?

Note is made to providing analysis of night-time work hours and how this would affect wildlife, but what about existing neighborhoods?

CHAPTER 3 – CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) EVALUATION

3.1 CEQA Environmental Checklist

Aesthetics

- Page 201 - The CEQA Significance Determinations for Aesthetics do not include an analysis for Agoura Road being identified as a local scenic resource per the Agoura Hills General Plan. Please analyze the urbanization of this semi-rural area by each proposed building alternative. The Determinations for Aesthetics also do not include an analysis of lighting impacts, nor a description of the types of lights and locations of all proposed light fixtures. Please include with the analysis a photometric plan with shown lumens.

Determinations for the visual characteristics are deemed “not substantially.” However, Agoura Road currently has open space. The addition of a tunnel over Agoura Road changes the visual dramatically. This tunnel is not covered by the City’s General Plan.

The promise of the motorists/pedestrians/cyclists to “be greeted with winged retaining walls and have been visually enhanced with texture and designs that

AH-84

Rare plant /focused surveys will be conducted, and avoidance, minimization, and mitigation measures will be created in collaboration with the California Department of Fish and Wildlife, if special status plants are found during rare plant/focused surveys.

AH-85

The Environmental Consequences discussion in section 2.1.4 Utilities/Emergency Services has been revised for clarification on the potential effects associated with the Build Alternatives.

AH-86

Potential effects to existing communities as a result of construction activities is discussed in the Environmental Consequences discussion in section 2.1.3.1 Community Character and Cohesion.

AH-87

The Scenic Resource Evaluation and Visual Impact Assessment concluded that the proposed project will have minimal visual impact, and will have minimal changes to the visual character of the area. Minimization measures would include the use of native plants to match the existing vegetation, and contour grading/slope rounding to help integrate the proposed vegetated bridge within its surrounding environment. The intent of the measures above would be to reduce the urbanizing effect of the project and lessen changes to the visual character of the area. Proposed lighting will be equipped with shields to direct light and minimize spill-over. The types of lights and locations of all proposed light fixtures will be developed in coordination with the City of Agoura Hills and in accordance with lighting

Mr. Ron Kosinski
October 26, 2017
Page 21 of 25

represent wildlife” on Agoura Road is false. This would need to go through the City’s planning process for any significant project within City limits.

There are several incorrect statements in this section:

“Alternative 1 and 2 are not inconsistent with the current surroundings.” As stated earlier, this road is surrounded by open space. No tunnel currently exists over Agoura Road, within the City of Agoura Hills.

“On Agoura Road, motorists must travel under the Liberty Canyon undercrossing before entering and existing the Liberty Canyon freeway exit.” The undercrossing or interchange is on Liberty Canyon, south of Agoura Road.

“There will be LED lighting through the bridge for motorists, however, the vegetated bridge and trail will not have any lighting.” I believe they are saying the lighting will be under the bridge (or in the tunnel) for vehicles. However, what about the sidewalk on the south side of the tunnel on Agoura Road? There may be lighting installed for the safety of the pedestrians. Again, this document only is analyzing the impacts of the project as it relates to the 101-Freeway.

Figures 7, 9, and 10, from an aesthetic view, do not blend into the mountains and open space on both sides of the bridges and are inconsistent with the character of the adjacent equestrian community known as Old Agoura. The bridges as depicted in Figures 7, 9, and 10 create visual impacts that are not addressed in the MND. The City of Agoura Hills should be included in the design group.

Air Quality

- Page 203 - The CEQA Significance Determinations for Air Quality should address particulate matter from grading during construction.

Again, construction has “less than significant” impacts on the 101-Freeway, but what about Agoura Road?

specifications using the lowest level of illumination/brightness to meet safety needs while minimizing glare.

AH-88

The final design of the proposed structure will be developed in collaboration with the City of Agoura Hills.

AH-89

Minimization measures would include the use of native plants to match the existing vegetation, and contour grading/slope rounding to help integrate the proposed vegetated bridge within its surrounding environment. The intent of the measures above would be to reduce the urbanizing effect of the project and lessen changes to the visual character of the area.

AH-90

All new street lighting will be developed in coordination with the City of Agoura Hills and in accordance with lighting specifications using the lowest level of illumination/brightness to meet safety needs while minimizing glare.

AH-91

The Scenic Resource Evaluation and Visual Impact Assessment concluded that the proposed project will have minimal visual impact, and will have minimal changes to the visual character of the area. Minimization measures would include the use of native plants to match the existing vegetation, and contour grading/slope rounding to help integrate the proposed vegetated bridge within its surrounding environment.

Mr. Ron Kosinski
October 26, 2017
Page 22 of 25

Biological Resources

- Pages 204-205 - The CEQA Significance Determinations for Biological Resources include the determination that the project would have no impacts regarding conflicts with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. This determination is also made in categories e and f, on page 205. However, impacts would occur as the project would conflict with the City of Agoura Hills Oak Tree Preservation Guidelines Ordinance and are requested to be assessed.

Geology

- Page 207 - CEQA Significance Determinations for Geology and Soils state: "...no known fault passes through or extend[s] towards the project site, therefore the hazard potential associated with ground surface rupture due to fault movements during earthquakes is considered low for the subject structure." Please clarify the project site is subject to seismic shaking of the region.

Hazards and Hazardous Materials

- Page 210-211 - A "less than significant determination" was made for categories b, g, and h of CEQA Significance Determinations for Hazards and Hazardous Materials. It is stated on page 211 that "Avoidance and minimization measures are described in Section 2.2.3." As Section 2.2.3 includes mitigation measures, please clarify whether categories b, g and h should be determined as "less than significant with mitigation incorporated."

Land Use and Planning

- Page 215 - CEQA Significance Determinations for Land Use and Planning state: "Building Alternatives 1 and 2 will not physically divide an established community and is consistent with Specific Area, City and County Plans." The wildlife bridge and tunnels are not identified in the City of Agoura Hills General Plan and, therefore, are not consistent with City plans. Please provide additional analysis for this issue, and the impacts of the project infrastructure physically dividing the neighborhood communities.

AH-92

All proposed construction activities, including grading and filling the slope between the proposed bridge abutment and Agoura Road, as well as constructing a tunnel and associated retaining wall system along Agoura Road, were analyzed as part of the Air Quality Assessment.

AH-93

As indicated in the Avoidance, Minimization, and/or Mitigation Measures discussion in section 2.3.1 Natural Communities, proposed project will comply with the Oak Tree Preservation ordinance by following the Oak Tree Permit process.

AH-94

The Geology and Soils discussion in section 3.1 CEQA Environmental Checklist has been revised to clarify that the project site is subject to seismic shaking.

AH-95

Measures listed in the Avoidance, Minimization, and/or Mitigation Measures discussion of section 2.2.3 Hazardous Waste/Materials are included to avoid or minimize potential impacts associated with categories b, g, and h, which are not considered significant for CEQA purposes.

AH-96

The project proposes a bridge across existing roadways. The proposed bridge would not bisect any established communities in the surrounding area. The proposed project is consistent with the County of Los Angeles General Plan, City of Agoura Hills General Plan, and City of Calabasas

Mr. Ron Kosinski
October 26, 2017
Page 23 of 25

Mineral Resources

- Page 216 - Within the CEQA Significance Determinations for Mineral Resources, please address compliance with the Mineral Resources section of the City of Agoura Hills General Plan Natural Resources Element, including Goal NR-8.

Noise

- Page 217 - The CEQA Significance Determinations for Noise states: "There are no human noise receptors within the project area." There are single family residential neighbors on the south side of Agoura Road, west of the project site, and at the southwest corner of Agoura Road and Liberty Canyon Road. Please analyze impacts to residents in the vicinity of the project. Please also analyze potential noise impacts resulting from construction and from use of the Agoura Road tunnel.

Population and Housing

- Page 218 - The CEQA Significance Determinations for Population and Housing states: "The proposed project is vegetated infrastructure which will occur in undeveloped area." Please clarify that the tunnel portion of the infrastructure on Agoura Road would not be vegetated.

Public Services

- Page 219 - In light of this paragraph noting impacts to emergency response services (ie: police, fire protection, etc), text should be added that outlines the requirement to install a 12-foot concrete or asphalt by-pass road on the south side of Agoura Road, since that is being constructed to preserve/guarantee a definitive route for emergency response services to use should the freeway mainline and/or the tunnel become impassable.

Transportation/Traffic

- Page 221 - Categories a, b, c and d of the CEQA Significance Determinations for Transportation/Traffic states: "The proposed project is consistent with local plans, ordinance[s] and policies. The project is not capacity increasing and will not alter the travel way, therefore, it will not result in any addition[al] congestion." The wildlife bridge and tunnels are not identified in the City of

goals and policies discussed in section 2.1.1.1 Consistency with State, Regional, and Local Plans and Programs. These plans strongly support protection and conservation of biological resources and ecological systems and specifically encourage the creation of wildlife crossing and supplemental measures such as fencing and signage in order to minimize impacts to wildlife and genetic diversity. The City of Agoura Hills expressly recognizes the importance of protecting and maintaining the Liberty Canyon wildlife corridor and adjacent areas.

AH-97

The Mineral Resources discussion in section 3.1 CEQA Environmental Checklist has been revised to address compliance with the City of Agoura Hills General Plan.

AH-98

The proposed project is not a capacity increasing project and it is not anticipated to result in traffic noise increase. The nearest residential location is 700 feet away from project construction site. Normally, construction noise levels should not exceed 86 dBA at a distance of 50 feet from 9 p.m. to 6 a.m. Noise produced by construction equipment would be reduced over distance at a rate of about 6 dBA per doubling of distance. No adverse noise impacts from construction are anticipated because construction would be conducted in accordance with Caltrans standard specifications and would be short-term and intermittent.

AH-99

The Population and Housing discussion in section 3.1 CEQA Environmental Checklist has been revised to

Mr. Ron Kosinski
October 26, 2017
Page 24 of 25

Agoura Hills General Plan and, therefore, are not consistent with City plans. Please provide additional analysis for the traffic safety impacts. Please also assess whether a tunnel on Agoura Road would result in any additional congestion with Alternative No. 2 (Options 1 and 2), with full transportation facilities, including facilities for vehicles, bicycles, and pedestrians.

- Categories e and f of the CEQA Significance Determinations for Transportation/Traffic, on page 221, states: “Emergency, and public transit, bicycle and pedestrian facilities will be maintained.” Please clarify whether these facilities will cause impacts, increase emergency response times, and/or increase the need for additional emergency personnel or equipment.”

Tribal Cultural Resources

- Page 222 - Originally, the project was strictly wildlife with no recreational trail component. However, somewhere in between, that has changed. Although, there are no documents cited to support the sudden change to include the recreation change, this does not preclude the environmental document from analyzing the impacts of a recreational trail. No traffic impact report was provided, nor facilities for parking, access of such a trail, whether this access point is on Agoura Road or elsewhere.

Again, the discussion of a trail on the overcrossing is discussed, but the pedestrian/emergency access on the south side of the tunnel portion on Agoura Road is not even mentioned, which would be the logical connection to other trails in the area.

- It is noted on page 70 that six Native American representatives of Chumash Indian communities were contacted via letters and phone calls for information on any issues of concern related to the proposed project. However, in the analysis of the CEQA Significance Determinations for Tribal Cultural Resources, on page 222, please indicate all Native American Tribes who were contacted in writing for a consultation meeting, in compliance with AB 52.

CHAPTER 4 – COMMENTS AND COORDINATION

- Page 235-236 - Changes to the project alternative since the scoping meeting: The details to the Design Option 2 are not provided. These details are important, particularly the pedestrian/emergency access to the south side, since

clarify that the tunnel portion on Agoura Road would not be vegetated.

AH-100

Please refer to section 2.1.4 Utilities/Emergency Services for the discussion on potential effects and proposed avoidance and minimization measures related to emergency response service in the project area.

AH-101

Please refer to the Environmental Consequences discussion in section 2.1.1.1 Consistency with State, Regional, and Local Plans and Programs for further analysis on the Build Alternatives.

AH-102

The Transportation/Traffic discussion in section 3.1 CEQA Environmental Checklist has been revised to discuss potential impacts to emergency services.

AH-103

Due to feedback received, the project team has removed the recreational trail from the project, and a recreational trail will not be built as part of this project.

AH-104

The Tribal Cultural Resources discussion in section 3.1 CEQA Environmental Checklist has been revised to include all Native American Tribes who were contacted in writing for a consultation meeting in compliance with AB 52.

AH-105

A modified version of Alternative 2 Design Option 2 has been identified as the preferred alternative.

Mr. Ron Kosinski
October 26, 2017
Page 25 of 25

it increases the footprint area of the project. This document should provide the details of the design within the tunnel, as well.

- Page 236 - Last statement should be revised to add the following italicized and underlined text at the end:

“Both design options for the proposed overcrossing over Agoura Road will consist of a vertical clearance of 18-feet, *and require construction of a 12-foot concrete or asphalt by-pass road on the south side of Agoura Road, adjacent to the creek.*”

AH-106

A modified version of Alternative 2 Design Option 2 has been identified as the preferred alternative. Please refer to section 1.8 Identification of a Preferred Alternative for further details.



State of California • Natural Resources Agency

Edmund G. Brown Jr., Governor

DEPARTMENT OF PARKS AND RECREATION

Lisa Ann L. Mangat, Director

Angeles District
1925 Las Virgenes Road
Calabasas CA 91302

November 8, 2017

Ron Kosinski, Deputy Director
California Department of Transportation, Division of Environmental Planning
100 S. Main Street, MS 16A
Los Angeles, CA 90012
Via email: liberty.canyon@dot.ca.gov

RE: Public Comment on Liberty Canyon Wildlife Crossing

Dear Mr. Kosinski:

California State Parks, Angeles District, supports the construction of a wildlife crossing at Liberty Canyon in the City of Agoura Hills, and more specifically, for the selection of Alternative 2, Option 1 for this crossing.

California State Parks understands the vital need for functional wildlife corridors to support animal movement throughout the region. Over the short-term, corridors function to reduce wildlife mortality by providing pathways to essential feeding, breeding and dispersal areas. Over the long-term, corridors maintain genetic diversity and reduce the chance of localized extinction.

We are especially interested in this project as it provides part of the needed linkage between the Santa Monica Mountains and other natural areas to the north, such as the Simi Hills and Los Padres National Forest. Liberty Canyon is an important part of that corridor, and US Route 101 (US-101) is a significant barrier for animal movement. Completion of this project will result in a functional wildlife crossing along Liberty Canyon, and will directly benefit animal populations within Malibu Creek State Park, located directly to the south of the project, and other lands we manage within the mountains.

Alternative 2, Option 1 is the best of the proposed alternatives. Alternative 2 provides protected animal movement over US-101 and Agoura Road for a wide suite of species, while Alternative 1 only provides protected crossing over US-101. Agoura Road would continue to be a sink under Alternative 1 for smaller, less mobile species such as woodrats, herpetofauna, and smaller birds. Option 1 is preferred as it has gentler slopes, which are more ideal for wildlife movement.

The project has identified several elements that will maximize the use of the crossing by wildlife. These include construction of fencing to channel wildlife through the crossing, and installation of native vegetation that both represents and transitions smoothly into

DPR-1

Thank you for your comment. Your support for the proposed project is acknowledged.

A modified version of Alternative 2 Design Option 2 has been identified as the preferred alternative. Please refer to section 1.8 Identification of a Preferred Alternative for further details.

Mr. Kosinski
November 6, 2017
Page two

adjacent habitats. We request the opportunity to review of the proposed Landscape and Fencing Plans so that we have the opportunity to provide feedback.

We recommend that standards and funding sources for maintaining and monitoring onsite vegetation and human use are included as a project component and detailed in the Mitigation Monitoring Plan. These will be needed to ensure that the project maintains adequate cover for wildlife, plant diversity, and that invasive weeds, human disturbance and trash are kept in check.

Thank you for the opportunity to comment upon this important project. Please contact my staff, Jamie King, Environmental Scientist at 818.880.0373 or Jamie.King@parks.ca.gov if we can provide additional information.

Sincerely,

A handwritten signature in blue ink, appearing to be 'CS' or similar initials, written over a light blue circular stamp.

Craig Sap
District Superintendent

Ronald Kosinski | LibertyCanyon@dot.ca.gov
 Deputy District Director
 Division of Environmental Planning, Division 7
 California Department of Transportation
 100 S. Main Street, MS 16A
 Los Angeles, California 90012

November 8, 2017

Dear Deputy District Director Kosinski,

The Topanga Creek Watershed Committee supports the use of wildlife corridors to enhance wildlife connectivity in the Santa Monica Mountains and its nearby mountain ranges. Based on our proximity to the crossing and the fact that our wildlife will be impacted by it, we feel that this is a Topanga Creek watershed issue. We also believe that mountain lions are by far the most vulnerable wildlife species in our midst and could benefit tremendously from a customized crossing. To that end, we believe that any such crossing should be specifically designed with mountain lion needs, behaviors and predilections in mind. While we understand the desire to pursue a crossing with the seemingly broadest possible appeal (e.g. recreational, organizational, and environmental), we caution against the pursuit of a utilitarian "solution," as it could short-change the animal most in need of our careful, thoughtful, and targeted intervention. A "one size fits all" approach rarely fits anyone particularly well. To that point, we conclude ultimately that mountain lion needs should be prioritized over other considerations so that our most vulnerable wildlife is not potentially sacrificed at the altar of expediency and human prerogative.

After consulting several diverse and credible research sources, with an emphasis on those that could provide relevant data and "in-the-field" observations, we have assembled the following list of observations and suggestions regarding the proposed corridor solution. We then marshal the evidence to offer a recommended course of action based on our research. To begin, we outline what we understand to be the purported premise or goal of the wildlife crossing.

- A. **WHAT WE UNDERSTAND THE GOAL OF THE WILDLIFE CORRIDOR TO BE:** The goal of the proposed wildlife corridor at Liberty Canyon is to facilitate connectivity and promote safe passage of our most endangered wildlife creatures in the Santa Monica Mountains among suitable habitat areas, with an emphasis on prioritizing our most genetically jeopardized species—the mountain lion (i.e. *Puma concolor*). We seek to ensure their long-term health and survival in this region. We believe that mountain lion access to territory is paramount because the male of this species requires by far the largest amount of territory (~150-200 sq miles per animal) of any creature in our area and is documented to be most vulnerable to the effects of inbreeding as a result of its segmented populations.

Given the above objective, we looked at various studies, articles and statements made by wildlife and transportation experts to deduce where, how and why certain types of crossings are selected in various locations for different types of wildlife. We homed in on the preferences of mountain lions.

- B. **RESEARCH FINDINGS AND WILDLIFE EXPERTS' RECOMMENDATIONS:** We researched and referenced many articles and studies, with a representative samples listed below:
- **Banff National Park in Canada - Observational Study** (undertaken by Tony Clevenger since 1996). Banff has the largest number of wildlife crossing in the world, 44, with 6 overpasses and 38 underpasses. A long-term analysis of crossings by wildlife in this area show a preference by mountain lions for underpasses relative to overpasses. According to the study, black bears and mountain lions prefer less-open structures (Clevenger & Waltho 2005).
 This preference existed in spite of a relatively scarce human population in the Park. It is likely that the Puma preference for subterranean crossings would be expressed even more markedly in an area where human activity is much more pronounced.
 - **The National Wildlife Federation (NWF) – summarizing existing research on wildlife corridors.**
 [EXCERPT] "...While wildlife use both the underpasses and overpasses, park experts have found that

TCWCB-1

Thank you for your comment. Your support for a wildlife crossing is acknowledged.

The proposed project's purpose is to preserve all of the wildlife species in the area, not only mountain lions. NPS has found roads and development to have significant effects on habitat fragmentation to many different species, including bobcats and coyotes, as well as smaller species such as lizards and birds. Improving connectivity with a wide, vegetated overpass will improve connectivity for a whole range of species.

different species have definite preferences. Grizzly bears, wolves, elk, moose and deer prefer high, wide and short crossing structures, while black bears and cougars tend to choose underpasses that are long, low and narrow. Smaller animals such as snowshoe hare, porcupines and voles like to use the drainage culverts when there's lots of traffic...."

Source: <http://blog.nwf.org/2014/07/getting-wildlife-safely-to-the-other-side-of-the-road/>

- **Center for Environmental Excellence by the American Association of State Highway and Transportation Officials (AASHTO): *Environmental Information for Transportation Professionals -- Decision Guide*¹**

"...Carnivores, or meat eating animals, are more likely to use underpasses smaller than those typically used by ungulates. Intermediate-sized carnivores, such as coyotes, bobcats, and wolves appear to use underpasses willingly, as do black bears...."

...An important consideration in the selection of a wildlife crossing is the topographic relief of an area and the landscape features near the road. Wildlife typically prefer to approach a road crossing while following a natural feature such as a ridgeline, low lying riparian area, or a corridor of vegetation where they feel safe...."

Type of Underpass Suggested as Appropriate for Pumas (i.e. Mountain Lions):²

Class 2 Medium Underpass - Box Culvert Dimensions - between 5' and 8' high. Also arch pipes, possible bridge extensions.

Attributes: Allows medium to large sized animals yet still not most ungulates, provides some cover, and may additionally allow for stream passage.

Most Suitable for: Animals that require some cover and some openness to see through passage. Meso mammals - coyote, bobcat, ocelot, lynx. Large carnivores: black bear, puma. Alligator, and all taxa that use smaller passages.

C. ADDITIONAL OBSERVATIONS AND SUGGESTIONS:

After looking at the research, we ruminated on which course of action we might pursue if we were charged with making this important decision. We prioritized the needs and preferences of mountain lions while also factoring in timeframe, budget and logistical issues.

1. **MODIFYING WHAT ALREADY EXISTS MAY BE FASTER, BETTER, AND MORE COST EFFECTIVE:** Another fact to keep in mind is that underpasses in the form of culverts/tunnels already exist to some extent in the targeted area. However, they have a few remediable limitations in their current incarnation. Most importantly, they do not terminate in propitious locations, do not have the optimal dimensions, and they do not provide a straight line of sight clear through to the other side. These deficiencies could theoretically be remediated with a retrofit such as the one being developed in Santa Cruz. In that area, which shares many similarities with our own site in that it is located in a mountainous, highly trafficked area with unstable geology and steep topography,³ two tunnels (in separate locations) are being substantially modified to optimize the existing underpasses for safe cougar passage. In addition, fences are being added to guide the animals to the modified culverts. The tunnels are being reinforced and lengthened to create a straight line of sight to the terminus so that cougars and other wildlife will feel confident using it. It should be noted that much thought went into the selection of tunnels instead of an overpass specifically because of the endangered mountain lions in their midst. An overpass was on the table, but it was rejected for a host of reasons, one of them being the observation that Pumas are more inclined to use underpasses (with the right fencing and vegetative cues).

In Santa Cruz, where the two tunnels were decided upon after a lengthy input process involving project developers, researchers and the public, the retrofit and expansion will involve modifying existing tunnels to make them geologically stable and conducive to mountain lion transport. While mule deer are less

¹http://environment.transportation.org/environmental_issues/wildlife_roads/decision_guide/manual/2_1.aspx

²Ibid.

³<http://www.mercurynews.com/2016/10/15/new-tunnels-in-santa-cruz-mountains-will-provide-cougars-safe-passage/>

TCWCB-2

From a wildlife perspective, the best option in the West Liberty Canyon area is a wide, vegetated, wildlife overpass. Although underpasses can also work for many species, their effectiveness is heavily dependent on the openness of the structure (height x weight/length).

Two other disadvantages of tunnels is that they could not be vegetated to provide natural habitat, particularly for smaller species, and the tunnels would go only across the 101 Freeway and not across adjacent Agoura Road. A wildlife overpass over both the 101 Freeway and Agoura Road would be ideal because it would provide maximum connectivity for the full range of wildlife species, including carnivores such as mountain lions, bobcats, and coyotes, but also mule deer and smaller species like small mammals, reptiles, and amphibians that are often unwilling to cross even small roads.

A wide overpass is needed to provide effective connectivity for a range of wildlife. According to The Federal Highway Administration's Wildlife Crossing Structure Handbook (Clevenger and Huijser 2011), the recommended width is 165-230 ft. and the minimum width is 130-165 ft. 165 ft. constitutes a minimum width for effective connectivity, especially given that no structures have been built over such a wide freeway to date.

likely to use the underpass, many species, in addition to mountain lions, are likely to use them, including, bobcats, raccoons, foxes, coyote, amphibians, and so forth.⁴ It should also be noted that many locations instituting wildlife crossings have developed both types of crossings to accommodate the preferences of different species. Given the predator-prey relationship of deer and mountain lions, it is hardly surprising that deer would benefit more from a separate crossing. That said, our local mule deer are not in the same precarious boat as our mountain lion brethren. If the deer population is to remain in check, it would seem reasonable to concentrate first on buttressing the vulnerable predator species that helps to keep their numbers in check. Too many deer is as bad as too few, since overpopulation can lead to starvation, illness, higher traffic incidents, etc. A natural balance between the species is important. For this reason, we urge policymakers to focus on stabilizing the imperiled mountain lion population first. When it comes to deer, adjustments to human hunting permits, logging, and fire suppression activities would appear to go further than an overpass to ensuring the success of the population long-term.⁵ Unlike mountain lions, mule deer do not require extensive territorial ranges to survive.

Based on wildlife research and engineering considerations, the ideal characteristics of the tunnels are as follows:

"...The tunnels must be wide enough to be inviting to animals. The Santa Clara County tunnel could measure up to 400 feet long; the Santa Cruz County tunnel, where the route is a bit narrower, could be as short as 120 feet. They'll require wire fencing to funnel wildlife into safe passage...."

2. **LINE OF SIGHT IMPEDIMENT IS A REAL PROBLEM FOR THE OVERPASS OPTION:** It should be noted that the bridge option currently being proposed at Liberty Canyon will **not** allow a clear vantage point for mountain lions from one side to the other on account of the angle that the bridge must be constructed for engineering and clearance purposes. Because of this limitation, the overpass/bridge option seems to have two major entrenched limitations: (1) it's an overpass, which is inherently less palatable to the stealth behaviors of mountain lions; and (2) it doesn't enable the mountain lion to see across the bridge, which will likely deter these animals from attempting to cross. They will not cross over into an opaque abyss, especially in a populated and highly trafficked area where humans are likely to be present on the mysterious *other side* of the bridge.
3. **A SMALL TUNNEL OPTION SHOULD BE EXPLORED FURTHER IN THE FORMAL ENVIRONMENTAL IMPACT REPORT (EIR)**
For unknown reasons, Caltrans abandoned a feasible, smaller "jacked box culvert" option that would not require a cut-and-cover approach in its MND. As can be seen in its MND analysis, Caltrans opted not to explore the smaller tunnel option in depth, opining that it would not "achieve the cost-benefit goals of this project." This explanation leaves more questions than answers.

Excerpt from the Preliminary Caltrans Environmental Assessment:

"Two other alternatives exist for this project, but were not fully developed due to recommendations from Caltrans' Project Delivery Team. Both alternatives proposed to construct a tunnel under US-101 to serve as a wildlife crossing.

The first, smaller, tunnel was a 13' x 13' jacked box culvert located west of Liberty Canyon Road. This tunnel would not accommodate the same wide range of wildlife species as an overcrossing. A tunnel study, originally done by the Federal Highway Administration Central Federal Lands Highway Division (FHWA-CFLHD) in 2010 and updated in 2015, estimated the cost at approximately \$19.7 million (see the Project Study Report, Attachment I). It was agreed that the cost-benefit would not achieve the goals of the project.

⁴ <http://www.mercurynews.com/2016/10/20/caltrans-commits-3-1-million-to-build-wildlife-tunnel-under-highway-17/>

⁵ <http://www.hrpub.org/download/20160229/EER3-14005647.pdf>

TCWCB-3

Line of sight is a very important component for various species in regards to crossing. If they cannot see where they are crossing to, they often will not cross at all. Because of this, a bigger tunnel was considered (with a higher openness ratio). However, a bigger tunnel that would provide connectivity for more species, such as 32 ft. wide by 15 ft. high tunnel, would apparently require cut and cover construction, which means the 101 Freeway would have to be shut down for construction, which is not considered feasible.

TCWCB-4

According to Caltrans specifications, the largest culvert that can be put under the 101 Freeway by tunnel-jacking is 13x 13, which at 13x 13x300 ft. long would be long and dark with low openness, and therefore not be effective for many species, including mule deer. A larger tunnel that would provide connectivity for more species, such as 32 ft. wide by 15 ft. high tunnel, would require cut and cover construction, which would mean shutting down the 101 Freeway, which is not considered feasible.

The second, larger, tunnel was a 32' wide x 15' high cast-in-place rectangular culvert located west of Liberty Canyon Road. This tunnel was not considered feasible due to constructability considerations and high traffic impacts. Specifically, such a large tunnel would require using the cut-and-cover technique and the closure of US-101, one of the busiest freeways in the region. In addition, it was estimated that such a large tunnel would be more costly than an overcrossing."

While we understand that the "cut-and-cover" technique required of the second tunnel option (which is much larger and higher) could necessitate unreasonable highway closures, this does not appear to be the case for the smaller "jacked box culvert" that Caltrans had initially suggested as an option. This option is unlikely to require the extensive closures that a higher and wider tunnel might. We might even recommend that they downsize this culvert even further to be no larger than 8' by 8', as recommended in the Wildlife Corridor Transportation study cited in our research summary in Section B. We believe that a smaller tunnel, with guidance fencing and cover vegetation, would not only be palatable to mountain lions based on existing research, it would be faster to build and easier to keep people from using and disturbing it. While affordability is not our first concern, we recognize that every municipality faces real budget constraints and must spend each dollar wisely. On that note, we advise against adopting an expensive "one size fits all" [but no one well] approach that might ironically serve everyone but the mountain lions it was intended to save.

CONCLUSION

In sum, we believe that a more in-depth study of a small/smaller tunnel option is critical, especially in light of the recommendations put forth in the Wildlife Corridor Transportation analysis cited above as well as the solutions ultimately adopted in Santa Cruz. Clearly, tunnels-especially those of intimate proportions- make sense for mountain lions. Further, it makes sense from a timeline and spending perspective to pursue the option that already has existing infrastructure in place.

No matter which option is ultimately pursued, extensive road closures are likely to occur. Even the bridge will require significant road closures, as they will not be able to "lasso" the massive overpass structure across the highway. It will have to be built in segments over the highway, which will necessitate lane and whole highway closures at various points during construction. Road closures should therefore not be held up as the reason for pursuing the overpass in lieu of the underpass.

While we believe that an underpass/tunnel/culvert is likely to be the best possible solution for mountain lions in our region based on their preferences and observed behaviors with respect to corridors, we recognize that other wildlife and humans may prefer an overpass solution. To that end, we might suggest a phased approach in which the mountain lion crossing is pursued first, with an overpass or recreational element explored later. However, we caution against any expedient integration of crossings intended for wildlife with those intended for humans. Wildlife need and deserve a safe place free from the grinding of mountain bike tires and ATVs. Humans have occupied enough space and have commandeered so much of the open space that our mountain lions need to roam freely. In addition, it is our duty as cognizant and rational beings to not set up our wildlife to fail by creating avoidable conflicts between our human pursuits (e.g. the keeping of domestic pets and livestock) and the natural instincts of wildlife.

Sincerely,

The Topanga Creek Watershed Committee Board

[Board members: *Rabyn Blake, William Preston Bowling, Bill Carrier, Carrie Carrier, Stephen Frantz, Randi Johnson, Josie Kelly, Roger Pugliese*]

TCWCB-5

During construction, the project will be constructed in stages that will minimize impacts to the communities. The project will be closely coordinated with other ongoing projects in the area. The goal of the proposed coordination is to ensure that adequate capacity remains available to accommodate the anticipated travel demand within the corridor by not implementing work zones on adjacent or parallel highways at the same time. This may entail communicating information about the timing of lane closures and coordinating diversion routes. Construction staging can be used to remove work at the same location or traffic control conflicts between adjacent projects. The project will be constructed in stages that will minimize impacts to the communities. The project will also be closely coordinated with other ongoing projects in the area.

In addition to a construction-staging plan, temporary adverse traffic impacts to businesses and transit services would be minimized with the implementation of a Traffic Management Plan (TMP).

TCWCB-6

Due to feedback received, the project team has removed the multi-use trail from the project, and a multi-use trail will not be built as part of this project.

November 8, 2017

Ronald Kosinski
Deputy Director, Division of Environmental Planning
California Department of Transportation
District 7, Division of Environmental Planning
100 S. Main Street, MS-16A
Los Angeles, CA 90012

Subject: Comments Liberty Canyon Crossing Project EA/MND

Dear Mr. Kosinski:

Thank you again for this opportunity to comment on the Liberty Canyon Wildlife Crossing. The need for such a crossing is well-established and will serve as a critical wildlife corridor, reconnecting the Santa Monica Mountains, south of US-101, to the northern reaches of the Simi Hills, ultimately connecting the SMMs to the Sierra Madre mountain range north of Highway 126. Establishing a safe and vegetated "bridge", especially for large mammals, such as mountain lions and bobcats, is critical to increasing and sustaining the genetic diversity so necessary for healthy wildlife species distribution in our surrounding wildlands. Without such a corridor, we will continue to see the decline of wildlife species such as the mountain lions in the SMMs, possibly to the point of "extinction."

I support Alternative 2: "Build" which appears to unequivocally concentrate on wildlife passage. This emphasis is important and should remain the number one priority of this project. I would not support development of a multi-use "corridor" passage which would also accommodate people, horses, cyclists, and recreationists, along with wild animals.

While mountain lions and other wild animals all "share" our trails with humans now in our parks and open spaces, this proposed crossing is a constrained method of connecting wildlands for wild animals, and designing it to also accommodate trail users and other recreationists, I believe, will compromise, and possibly defeat the primary mission of ensuring the survival of bio-diversity in this region.

SN-1

Thank you for your comment. Your support for the proposed project is acknowledged.

SN-2

Due to feedback received, the project team has removed the multi-use trail from the project, and a multi-use trail will not be built as part of this project.

Page Two/Nissman Comments 11/8/17

Local trails abound in the surrounding area, and there are other ways to create and manage connectivity for recreationists without infringing on the safe passage of the wild animals. Additionally, my moderate research and reading on these kinds of crossings is that they are all purposed and dedicated for wildlife crossing only. I do not want to risk the success of this venture by seeing it designed for multi-use. With that in mind, I believe the proposed monitoring schedule of the crossing should be increased from 5 years after construction to a minimum of 20 years of monitoring and evaluation. It took a couple of generations to get to this point now where our large mammals are threatened with extinction; it will take time to bring back the bio-diversity necessary to sustain these species, and long-term monitoring and evaluation will provide meaningful information on how to change, correct, and enhance the crossing.

Community issues, such as traffic and land use impacts, will also need to be addressed. Community and neighborhood outreach needs to be ongoing and inclusive. Community participation should be encouraged and recognized as an important element in this collaboration between government agencies and stakeholders throughout the entire project.

If, at any point, the crossing mission should evolve to a concept of "multi-use", I believe this MND would fall far short in terms of evaluating the impacts on the immediate environment, including increased traffic, sightseers, tourists and recreationists, all requiring parking facilities, etc.

Thank you, again, for this opportunity to comment on the MND for the Liberty Canyon Crossing. As 40-year residents of the Santa Monica Mountains, my family and I are very aware of the precious and fragile Mediterranean eco-system we live in; development, bifurcated open spaces, freeway barriers, and climate change, are threats we can not ignore. This wildlife crossing was needed "yesterday", and now, more than ever --- before it is too late and there is no turning back ---it is needed now.

Sincerely,

Susan Nissman
1577 N. Topanga Cyn. Blvd.
Topanga, CA 90290
nissman@aol.com

SN-3

The project will be constructed in stages that will minimize impacts to the communities. The project will also be closely coordinated with other ongoing projects in the area. Community and neighborhood outreach efforts have been ongoing and will continue throughout the life of the project.

SN-4

Potential traffic impacts and potential land use impacts are discussed in section 2.1.5 Traffic and Transportation/Pedestrian and Bicycle Facilities and section 2.1.1 Land Use and Planning, respectively. Community and neighborhood outreach efforts have been ongoing and will continue throughout the life of the project.



BOARD OF SUPERVISORS COUNTY OF LOS ANGELES

821 KENNETH HAHN HALL OF ADMINISTRATION / LOS ANGELES, CALIFORNIA 90012
Tel: 213-974-3836 Fax: 213-975-7360 Sheila@cos.lacounty.gov

SHEILA KUEHL
SUPERVISOR, THIRD DISTRICT

November 8, 2017

Ronald Kosinski, Deputy Director
Division of Environmental Planning
California Department of Transportation, District 7
100 S. Main Street, MS-16A
Los Angeles, CA 90012

RE: Comment Letter on Liberty Canyon Wildlife Crossing: Proposed Mitigated Negative Declaration/Environmental Assessment

Dear Mr. Kosinski:

Thank you for the opportunity to comment on the Liberty Canyon Wildlife Crossing, proposed Mitigated Negative Declaration and Environmental Assessment. I have always been supportive of a wildlife crossing at the 101 Freeway in the Santa Monica Mountains to provide safe passage for mountain lions and other wildlife. The impacts on our regional wildlife populations created by the traffic on the 101 freeway are severe, including mortality, habitat loss and fragmentation, and lack of genetic diversity. Safe passages at key locations over our freeway system are critical for the long-term health of our regional wildlife, particularly for wide-ranging species such as mountain lions.

While I very much appreciate the work the California Department of Transportation has done to advance the concept of a wildlife crossing over the 101 Freeway, I strongly oppose including any element that facilitates or promotes human interaction on the overpass, such as hiking and biking trails. The Federal Highway Administration's Wildlife Crossing Structure Handbook recommends that sites identified as providing critical habitat linkages, such as the one at Liberty Canyon, should be designed and maintained exclusively for wildlife use.

Thank you for your consideration of my comments. Should you have any questions, please do not hesitate to contact my Planning and Transportation Deputy, Nicole England, at (213) 974-3333.

Sincerely,

Sheila Kuehl
Supervisor, Third District

BSCLA-1

Thank you for your comment. Your support for the proposed project is acknowledged.

Due to feedback received, the project team has removed the multi-use trail from the project, and a multi-use trail will not be built as part of this project.



CALIFORNIA
NATIVE PLANT SOCIETY

Los Angeles /Santa Monica Mountains Chapter

15811 Leadwell Street
Van Nuys, California 91406-3113

Ronald Kosinski
Deputy Director, Division of Environmental Planning
California Department of Transportation
District 7, Division of Environmental Planning
100 S. Main Street, MS-16A
Los Angeles, CA 90012

VIA ELECTRONIC COMMUNICATION: liberty.canyon@dot.ca.gov

November 8, 2017

**RE: LIBERTY CANYON WILDLIFE CROSSING
MITIGATED NEGATIVE DECLARATION
PUBLIC COMMENT**

Dear Mr. Kosinski,

California Native Plant Society (CNPS) respectfully submits the following comments in review of the MND for the Liberty Canyon Wildlife Crossing project. We are a state-wide science-based non-profit that works with governance, policymakers, planners, communities, and educational institutions for conservation and horticultural use of California's endemic native plants. The Los Angeles/Santa Monica Mountains Chapter has a long history and current involvement of collaborating on projects in the geographic area that includes the Crossing.

Our careful review of the MND determines that ALTERNATIVE 2 – DESIGN OPTION 1 is the most environmentally and functionally prudent selection of the various suggested plans for the Crossing because it:

- Minimizes environmental impact
- Allows establishment of native vegetation and ample accessibility to wildlife based on slope, ingress, egress, and width
- Provides best continuity with the existing natural environment on either side of the proposed Crossing

California Native Plant Society – Los Angeles/Santa Monica Mountains Chapter
Liberty Canyon Wildlife Crossing DEIR Comments

1

CNPS-2

Thank you for your comments. Your concerns are addressed on the following pages.

We appreciate CALTRANS staff thorough analysis that is conveyed in the MND. CNPS believes that a FULL EIR is necessary, should Alternative 2 – Option 2 or Alternative 3 be selected. These two alternatives create significantly greater environmental impact that will require additional and full analyses under the California Environmental Quality Act.

CNPS recommends a State Certified Botanist approved by California Department of Fish and Wildlife certification program be hired as a monitor during all soil disturbance and landscaping activities associated with the Crossing. This will ensure protections and success for existing and landscaped vegetation within the project zone. The National Park Service monitoring plan associated with the Crossing should incorporate an element for native and possible invasive plant species.

We support focused rare plant surveys conducted prior to construction activities. These should be conducted at biologically prudent times based on the growth habit of each species in concert with time of year, seasonal and soil moisture, and other typical conditions.

CNPS disagrees with the ‘no effect determination’ for four of the five rare plant species having the potential to occur in the project area. The Certified Botanist should monitor sites during construction, landscaping, and stabilization activities associated with the Crossing establishment. Our local experience and knowledge informs the following species in the MND noted with ‘no effect determination’ that have higher probability to occur than stated in the report:

1. Mesa horkelia [*Horkelia cuneata* var. *puberula* (Rydb.) Erter & Reveal] – Herbaria records strongly suggest the potential to occur based on vouchers from collections made within the vicinity of the Crossing project
2. Ojai navarretia [*Navarretia ojaiensis* Elvin, J.M. Porter, & L.A. Johnson] – an existing population is documented to occur near the project area and within similar growing conditions
3. Round-leaved filaree [*California macrophylla* (Hook. & Arn.) J.J. Aldasoro, C. Navarro, P. Vargas, L. Sáez & C. Aedo] – an existing population is documented to occur near the project area and within similar growing conditions
4. San Fernando Valley spineflower [*Chorizanthe parryi* var. *fernandina* (S. Watson) Jeps.] – an existing population is documented to occur near the project area and within similar growing conditions

All landscaping and otherwise establishment of native vegetation at the site, either on the Crossing or within the construction area of impact must use native plants endemic to the local area and appropriate for the various growing conditions of soil, light, aspect, slope. Ideally, genotypic materials hailing from the geographic area of the project site should be used.

Topsoil within the construction zone should be removed prior to project activity, stored onsite, covered or otherwise protected, and replaced prior to landscaping. The topsoil harbors soil fungi, microbes, and seed bank essential to healthy habitat restoration and biotic components establishment at the site. This procedure should be replicated with the local borrow material that will be used as substrate on the Crossing. Compaction should be light after placement to allow adequate soil porosity, root and water penetration, microbial and fungal population establishment. These practices will help ensure establishment and long-term viability of plantings and protections for *in situ* vegetation.

Encroachment to the vibrant oak woodland and riparian willow populations must be avoided. The biotic contributions of these vegetation types tangent to the Crossing and ambient habitat cannot be understated and therefore must be undisturbed and protected.

CNPS-3

A State Certified Botanist approved by California Department of Fish and Wildlife certification program will be used to monitor soil disturbance and landscaping activities for the Liberty Canyon Project.

CNPS-4

While suitable habitat for mesa horkelia occurs within the BSA, individuals were not observed during vegetation surveys. In 1935, a plant was identified within 1 mile of the intersection of Liberty Canyon and US-101. Since then, no other observations have been noted adjacent to the project area. As discussed in the NES, future focused rare plant surveys will take place in order to confirm their absence within project limits. If mesa horkelia is found during focused rare plant surveys, coordination will take place with CDFW, USFWS, and CNPS, and avoidance and minimization measures will be implemented.

CNPS-5

While suitable habitat for Ojai navarretia occurs within the BSA, individuals were not observed during vegetation surveys. In 2008, a plant was identified within 1 mile of the intersection of Liberty Canyon and US-101. Also, in 2007, another plant was identified within 5 miles of the project area. As discussed in the NES, future focused rare plant surveys will take place to confirm their absence within project limits. If Ojai navarretia is found during focused rare plant surveys, coordination will take place with CDFW, USFWS,

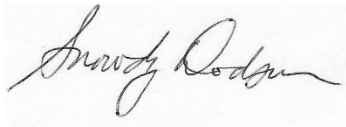
CNPS recommends that one of the Crossing biological project partners work with the City of Agoura Hills designee on an ongoing basis throughout the construction and establishment of the project to ensure the Oak Tree Preservation Ordinance is upheld and uncompromised. This will help better inform all project partners and ensure habitat protections while supporting tenets of the Ordinance.

We strongly oppose the proposed mitigation measure of a 2:1 ratio for any take of oaks. Oak tree habitat removal results in logarithmic negative biotic affects to understory vegetation, wildlife foraging, pollination, and other environmental services. Most oak species are slow growing. Therefore, ecosystem recovery after take can be years. CNPS recommends removal, safeguarding, and replacement of *in situ* topsoil along with an oak mitigation ratio of no less than 5:1. Mitigation location is unstated in the MND. It should be onsite, with a second and not preferred nearby parcel.

Water is recommended as a soil stabilizer during construction activities. Particulate matter contact with native vegetation should be avoided and mitigated by periodic spraying of dusted foliage with non-contaminated water. Should use of soil stabilizers and binders be necessary, the compounds need to be biodegradable and registered for use in wetland and sensitive habitat areas.

CNPS thanks CALTRANS for the opportunity to comment on this important project that will provide needed biological connectivity between the inland and coastal Transverse Ranges. We appreciate the extension period afforded for public comment. We look forward to the manifestation of the Crossing in the next few years.

Sincerely,



Snowy Dodson, Chair
Los Angeles/Santa Monica Mountains Chapter
California Native Plant Society

and CNPS, and avoidance and minimization measures will be implemented.

CNPS-6

While suitable habitat for round-leaved filaree occurs within the BSA, individuals were not observed during vegetation surveys. In 2005, a plant was identified within one mile of the intersection of Liberty Canyon and US-101. Since 2005, no other observations have been noted. As discussed in the NES, future focused rare plant surveys will take place in order to confirm their absence within project limits. If round-leaved filaree is found during focused rare plant surveys, coordination will take place with CDFW, USFWS, and CNPS, and avoidance and minimization measures will be implemented.

CNPS-7

While moderately suitable habitat for San Fernando spineflower occurs within the BSA, individuals were not observed during vegetation surveys. There is one known occurrence of the species within three miles of the BSA, north of U.S. 101 at Laskey Mesa. As discussed in the NES, future focused rare plant surveys will take place in order to confirm their absence within project limits. If San Fernando Valley spineflower is found during focused rare plant surveys, coordination will take place with CDFW, USFWS, and CNPS, and avoidance and minimization measures will be implemented.

CNPS-8

Per existing Caltrans Standard Specifications (Section 19 [Earthwork] and Section 21 [Erosion Control]), topsoil within the construction zone will be removed prior to project activity, stored onsite, covered or otherwise protected, and replaced prior to landscaping in order to ensure healthy habitat restoration.

CNPS-9

The extent of the proposed project footprint was evaluated for each alternative and it is anticipated that Alternative 1 will permanently impact 1 oak tree and Alternative 2 will permanently impact 19 oak trees. Oak trees will be avoided to the greatest extent possible; however, due to various design constraints, they will not be avoided completely. While the oak trees are of great importance, their removal is a localized impact. The loss of isolated wildlife populations cannot be mitigated nearly as easily. The next best thing that can be done is to minimize the impacts to the oak trees. The following measures are recommended to avoid and minimize the permanent and temporary impacts to valley oak woodlands for all alternatives:

- A full inventory of all trees within the BSA will be conducted prior to construction of the proposed project. The inventory will identify the tree species, a native or non-native designation, DBH, location, project impacts, and the compensatory mitigation required. Tree tags will be deployed on all trees with a minimum DBH of 2 inches to identify all trees and will be collected upon tree removal to keep track of trees removed.
- The proposed project will comply with the City of Agoura Hills Oak Tree Preservation Ordinance and Oak Tree Permits will be obtained for all oak trees outside of Caltrans right-of-way.
- All oak trees that are identified as “not to be impacted” in the full tree inventory will have an Environmentally Sensitive Area (ESA) fence placed around them and no construction equipment or personnel will enter the area. A biological monitor or certified arborist will oversee the placement of ESA fencing.
- A biological monitor or certified arborist will be present during any construction activities that have the potential to impact oaks including but not limited to clearing and grubbing, excavation, and grading near oak woodlands.

- A certified arborist will be present for all oak tree trimming, excavation within the protected radius of oak trees (five feet beyond the dripline), and placement of fill within the protected radius.
- Tree roots will not be exposed to sun or drying for more than 12 hours. All exposed roots shall be protected by a minimum four (4) inches of a combination of compost and backfill covered by moistened burlap as soon as possible. Backfill for this purpose shall be gathered from surrounding areas.

All oak woodland habitat that is temporarily impacted by construction activities will be restored with the native vegetation species present within the BSA including oak trees. The landscape plan for these areas will be developed in coordination with the District Biologist, SMMC, and NPS to ensure that the placement of vegetation is appropriate for both the valley oak woodland composition and for wildlife movement.

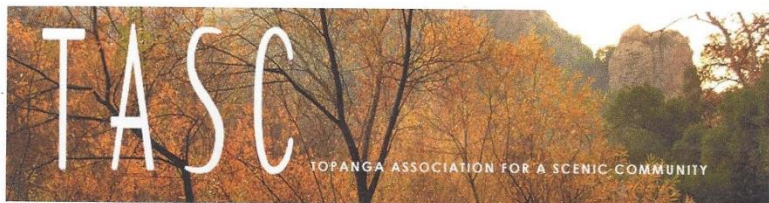
CNPS-10

If all efforts to avoid and minimize impacts have been exhausted, then mitigation will take place. On-site restoration of all temporarily impacted oak woodlands and on-site compensation for all permanently impacted oak trees will be required to mitigate for impacts to valley oak woodlands. All compensatory mitigation required is proposed to be completed on-site but if sufficient space is not available, off-site mitigation within the Santa Monica Mountains will be implemented. All oak woodland habitat and trees that are permanently impacted by the proposed project will be mitigated with the creation and/or restoration of oak woodland habitat. Recommendations for the minimum compensatory mitigation ratios are found below but the final mitigation ratios will be determined in coordination with CDFW and the City of Agoura Hills under the respective agreements and permits issued for the project.

Species	DBH Range (inches)	Compensatory Mitigation Ratio
Oak	<5	2:1 (by acres impacted)
Oak	5 to 12	5:1
Oak	12 to 24	10:1
Oak	24 to 36	15:1
Oak	>36	20:1
Other Native Woodland Tree	5 to 12	5:1
Other Native Woodland Tree	12 to 24	10:1

CNPS-11

Should use of soil stabilizers and binders be necessary, non-contaminated water shall be used. The compounds within the non-contaminated water will be biodegradable and registered for use in wetland and sensitive habitat areas.



TOPANGA ASSOCIATION FOR A SCENIC COMMUNITY
PO BOX 352 TOPANGA CA. 90290
www.tasc4topanga.org

Ronald Kosinski
 Deputy Director, Division of Environmental Planning
 California Department of Transportation
 District 7, Division of Environmental Planning
[100 S. Main Street](#), MS-16A
 Los Angeles, CA 90012

Mr Kosinski,

Our organization representing over 350 residents in Topanga Canyon has had the opportunity to review the documents for the proposed Liberty Canyon Wildlife crossing over the Ventura Freeway. The concept of a safe crossing for wildlife is of extreme importance and should be considered as a priority. We are pleased that this endeavor is moving forward.

We are also in receipt of some comments made by other organizations and some of the important points made need to be emphasized again.

In the MND/EA thus far,

Caltrans has studied only three crossing alternatives:

1. No Build Alternative.
2. Alternative 1 - A 165 foot wide by 200 foot long bridge across the 101 only.
3. Alternative 2 - A 165 foot wide by 200 foot long bridge across the 101, plus, an extension that is built over Agoura Road. The extension has two design options: a 48 foot wide bridge or a 54 foot wide bridge.

Of the alternatives studied - we support Alternative 2 because it is the superior choice for all wildlife crossing; and, we concur with the Santa Monica Mountains Conservancy, taking no position on the design option element of 48 or 54 feet

TASC-1

Thank you for your comment. Your support for the proposed project is acknowledged.

While Alternative 2 Design Option 1- construct a 48-foot wide and 16.5-foot high bridge did have more public support, a better environmental footprint and is more affordable than Alternative 2 Design Option 2- construct a 54-foot wide and 18-foot high bridge, a portion of the project (including Agoura Road) is within the City of Agoura Hills right-of- way and it is the City's interest to maintain ownership to as much of their right-of-way as possible around Agoura Road.

TASC-2

A modified version of Alternative 2 Design Option 2 has been identified as the preferred alternative. Please refer to section 1.8 Identification of a Preferred Alternative for further details.

TASC-3

According to Caltrans specifications, the largest culvert that can be put under the 101 Freeway by tunnel-jacking is 13x 13, which at 13x 13x300 ft. long would be long and dark with low openness, and therefore not be effective for many species including mule deer. A bigger tunnel that would provide connectivity for more species, such as 32 ft. wide by 15 ft. high tunnel, would apparently require cut and cover construction, which means shutting down the 101 Freeway, which is not considered feasible.

wide. Although, the 48 foot design may have less environmental impacts, the city of Agoura Hills has clearly and consistently demonstrated that this is not an option that will work for the city. It makes no sense to challenge their authority or analysis and risk having to settle for no add-on bridge design at all (Alternative 1). Thus, 48 feet is not a feasible design option.

Tunnels must be Studied as an Alternative.

Research indicates constructing tunnels under freeways and roadways for safe wildlife passage is a data-proven success, including for mountain lions. In many instances, tunnels are the preferred method for cougar crossings. Yet, tunnels were not studied as an alternative in the MND. Adequately analyzing them should be added as a requirement now in this Draft. It is the only way to make an accurate comparison in line with the other build alternatives. The material that is referenced about tunnels by Caltrans outside of this document, cannot be substantiated because none of it has been included or attached in the report.

Keep the Wildlife Crossing Wild. Remove the Recreational Element. The EA is Deficient with Regard to Recreational Uses.

There are numerous references to recreation and recreational elements woven in and found throughout the MND/EA and yet recreation/impacts have not been studied in the assessment!

For example:

Pg. 20 - "constructing a five foot multi-use, single track compacted dirt recreational trail on the overcrossing"

Pg. 43 - "Regional Bicycle Master Plan - A potential bicycle hub is identified at the Liberty Canyon Road Trailhead... as such the follow goal and objective may be relevant to the project. Objective 1:1: Connectivity through an expanded bikeway network...expand the existing bicycle network to provide a comprehensive, regional network of bicycle transportation facilities that increases connectivity between homes, jobs, public transit, schools, trailheads, and recreational resources for a variety of users in the Las Virgenes-Malibu region."

Affected Environment: Environmental Consequences

*Pg. 161 -The proposed project has the potential to connect existing multi-use trails within the Santa Monica Mountains and provide a pathway across US-101 for recreation. Construction of a multi-use, single-track recreational trail on the wildlife overcrossing for recreational activities including hiking, mountain biking, and horseback riding can provide this connection. The purpose of the trail is to increase opportunities for recreation in the area, and in particular to allow trail users on either side of 101 to connect to trails on the other side.

*Page 165 - As the overcrossing presents an opportunity to educate trail users and visitors about the wildlife species and native vegetation within the study region as well as the overcrossing structure itself placement of an educational

Two other disadvantages of tunnels is that they could not be vegetated to provide natural habitat, particularly for smaller species, and the tunnels would go only across the 101 Freeway, and not across adjacent Agoura Road. A wildlife overpass over both the 101 Freeway and Agoura Road would be ideal because it would provide maximum connectivity for the full range of wildlife species, including carnivores such as mountain lions, bobcats, and coyotes, but also mule deer and smaller species such as small mammals, reptiles, and amphibians that are often unwilling to cross even small roads.

A wide overpass is needed to provide effective connectivity for a range of wildlife. According to The Federal Highway Administration's Wildlife Crossing Structure Handbook (Clevenger and Huijser 2011), the recommended width is 165-230 ft. and the minimum width is 130-165 ft. 165 ft. constitutes a minimum width for effective connectivity, especially given that no structures have been built over such a wide freeway to date.

TASC-4

Due to feedback received, the project team has removed the multi-use trail from the project, and a multi-use trail will not be built as part of this project.

kiosk within the BSA should be considered. In coordination with the SMMC, MRCA, and RCDSMM, construct an education kiosk within the BSA....

The Liberty Canyon Wildlife Crossing should be for wildlife and wildlife only -- not for a circus of humans, dogs, horses, bicycles, tourists,buses,

We do support a wildlife crossing at Liberty Canyon, and support continuing this current process of environmental review with Caltrans including all of the environmental impacts - lighting, noise, traffic, etc. that has not been completed. The Negative Declaration falls short of its goal and further review must continue.

Thank you again for this opportunity to comment on the Liberty Canyon Wildlife Crossing.

Roger Pugliese
Chair
TASC

--

Ronald Kosinski
Deputy Director, Division of Environmental Planning
California Department of Transportation
District 7, Division of Environmental Planning
100 S. Main Street, MS-16A
Los Angeles, CA 90012

Dear Mr. Kosinski:

Thank you for the opportunity to comment on the Liberty Canyon Wildlife Crossing Project - Proposed Mitigated Negative Declaration/Environmental Assessment.

I/we support a safe and sustainable wildlife crossing at the US-101, just west of Liberty Canyon Road, in the city of Agoura Hills. This will allow wildlife to move freely once again between the Santa Monica Mountains, the Simi Hills, Santa Susana Mountains, and the Sierra Madre Mountain Range. It will restore and increase habitat connectivity where it has been fragmented by the 101 freeway, reduce wildlife mortality, and allow for the exchange of genetic material for our threatened mountain lions, bobcats, and other species.

Alternative s Studied.

In the MND/EA thus far,

Caltrans

has
only
studied three crossing alternatives:

1. No Build Alternative.
2. Alternative 1 - A 165 foot wide by 200 foot long bridge across the 101 only.
3. Alternative 2 - A 165 foot wide by 200 foot long bridge across the 101, plus, an extension that is built over Agoura Road. The extension has two design options: a 48 foot wide bridge or a 54 foot wide bridge.

Of these

alternatives studied - Alternative 2

is the superior choice for all wildlife crossing; and, we concur with the Santa Monica Mountains Conservancy, taking no position on the design option element of 48 or 54 feet wide. Although, the 48 foot design may have less environmental impacts, the city of Agoura Hills has clearly and consistently demonstrated that this is not an option that will work for the city. It makes no sense to challenge their authority or analysis and risk having to settle for no add-on bridge design at all (Alternative 1).

MNVCA-1

Thank you for your comment. Your support for the proposed project is acknowledged.

MNVCA-2

From a wildlife perspective, the best option in the West Liberty Canyon area is a wide, vegetated, wildlife overpass. Although underpasses can also work for many species, their effectiveness is heavily dependent on the openness of the structure (height x weight/length). According to Caltrans specifications, the largest culvert that can be put under the 101 Freeway by tunnel-jacking is 13x 13, which at 13x 13x300 ft. long would be long and dark with low openness, and therefore not be effective for many species, including mule deer. A larger tunnel that would provide connectivity for more species, such as 32 ft. wide by 15 ft. high tunnel, would require cut and cover construction, which would mean shutting down the 101 Freeway, which is not considered feasible.

Two other disadvantages of tunnels is that they could not be vegetated to provide natural habitat, particularly for smaller species, and the tunnels would go only across the 101 Freeway and not across adjacent Agoura Road. A wildlife overpass over both the 101 Freeway and Agoura Road would be ideal because it would provide maximum connectivity for the full range of wildlife species,

Tunnels Should be Studied as an Alternative.

Research indicates constructing tunnels under freeways and roadways for safe wildlife passage is a data-proven success, including for mountain lions. In many instances, tunnels are the preferred method for cougar crossings. Yet, tunnels were not studied as an alternative in the MND. Why? Adequately analyzing them should be added as a requirement now in this Draft. It is the only way to make an accurate comparison in line with the other *build* alternatives. The material that is referenced about tunnels by Caltrans outside of this document, cannot be substantiated because none of it has been included or attached in the report.

Funding Change.

To date, the National Wildlife Federation's fundraising efforts have fallen short of anticipated goals - particularly from the private sector. Therefore, cost, and the cost of having to garner significantly more *public* sector dollars than originally disclosed and planned for, is a growing concern. With more public dollars comes a greater threat of human access and public use. Therefore,

if

tunnels are a feasible

option -- they are less expensive to build, and would diminish the threat of human use or exploitation and recreational biological impacts. In other words, because the funding equation has changed from the original plan, we need to re-evaluate and look at all of our options equally, creatively, and with a fresh light.

Utilizing the Current Liberty Canyon Underpass.

Another option that does not appear to be addressed in this document is the utilization of the current Liberty Canyon underpass. Accordingly, in the initial plan, phase 1, was to have been the re-vegetation of the areas leading to and beneath the freeway to aid in potential wildlife crossings. What happened to this? The construction phase of building the overpass is estimated to take a minimum of 2.5 years once everything else is completed. Clearly we are still *years* away from a functioning overpass. There should therefore be something meanwhile put into place; and further, why not explore other creative temporary, or permanent solutions for the current Liberty Canyon underpass because it already exists? Perhaps utilizing two of the four lanes, or shutting down the off-ramp during certain times of the evening? There are numerous options that can be studied and analyzed.

Keep the Wildlife Crossing Wild. Remove the Recreational Element. The EA is Deficient with Regard to Recreational Uses.

There are numerous references to recreation and recreational elements woven in and found throughout the MND/EA and yet recreation/impacts have not been studied in the assessment!

For example:

Pg. 20 - "constructing a five foot multi-use, single track compacted dirt

including carnivores such as mountain lions, bobcats, and coyotes, but also mule deer and smaller species like small mammals, reptiles, and amphibians that are often unwilling to cross even small roads.

A wide overpass is needed to provide effective connectivity for a range of wildlife. According to The Federal Highway Administration's Wildlife Crossing Structure Handbook (Clevenger and Huijser 2011), the recommended width is 165-230 ft. and the minimum width is 130-165 ft. 165 ft. constitutes a minimum width for effective connectivity, especially given that no structures have been built over such a wide freeway to date.

MNVCA-3

At this time, all funding for the proposed project is from private sources. #SaveLACougars is primarily seeking private philanthropic dollars, although public dollars earmarked for conservation have been, and will continue to be, sought. Up-to-date fundraising progress and other information is available at www.savelacougars.org.

MNVCA-4

In regards to updating the current Liberty Canyon Undercrossing, Caltrans, Resource Conservation District of the Santa Monica Mountains (RCDSMM), The Mountains Recreation and Conservation Authority (MRCA), and Santa

recreational trail on the overcrossing"

Pg. 43 - "Regional Bicycle Master Plan - A potential bicycle hub is identified at the Liberty Canyon Road Trailhead... as such the follow goal and objective may be relevant to the project. Objective 1:1: Connectivity through an expanded bikeway network...expand the existing bicycle network to provide a comprehensive, regional network of bicycle transportation facilities that increases connectivity between homes, jobs, public transit, schools, trailheads, and recreational resources for a variety of users in the Las Virgenes-Malibu region."

Affected Environment; Environmental Consequences

*Pg. 161 -The proposed project has the potential to connect existing multi-use trails within the Santa Monica Mountains and provide a pathway across US-101 for recreation. Construction of a multi-use, single-track recreational trail on the wildlife overcrossing for recreational activities including hiking, mountain biking, and horseback riding can provide this connection. The purpose of the

trail is to increase opportunities for recreation in the area, and in particular to allow trail users on either side of 101 to connect to trails on the other side.

*Page 165 - As the overcrossing presents an opportunity to educate trail users and visitors about the wildlife species and native vegetation within the study region as well as the overcrossing structure itself placement of an educational kiosk within the BSA should be considered. In coordination with the SMMC, MRCA, and RCDSMM, construct an education kiosk within the BSA....

The Liberty Canyon Wildlife Crossing should be for wildlife and wildlife only -- not for a circus of humans, dogs, horses, bicycles, tourists,

buses,

groups, hikers, picnickers, etc. and all of the accompanying impacts - trash, dog waste, boom blasters, food, cigarettes, et al. And, as a result of that increased use, there would be a new need to potentially build additional parking facilities and access others, ADA access, visitor kiosks, restrooms, and even sidewalks. It defeats the entire purpose, bringing in development and people where there are few to none now. Nevermind, the noise, light, parking, and traffic impacts on wildlife, and on the surrounding and adjacent rural communities. And again, none of these impacts have yet been studied in this document.

There is zero evidence that any wildlife crossing allows people. As a matter of fact, they are strictly prohibited:

For 25 years, Banff National Park has been a world leader with the most numerous and varied wildlife crossing structures in the world (36 underpasses and 6 overpasses). And, it supports the world's longest, year-round monitoring program and largest data set on wildlife mitigation. Does human use of wildlife crossings affect how animals use them? Yes, according to these experts, "when people use crossings, animals tend to use them less. Human use of overpasses is strictly prohibited in Banff National Park." And even more alarming for Liberty Canyon, is that it is situated in one of the largest urban populations centers in the country.

Monica Mountains Conservancy (SMMC) have already begun construction of the Liberty Canyon Interim Project. The project will connect existing riparian areas both upstream and downstream of the 101 freeway by utilizing the current Liberty Canyon underpass (building a ""dry stream bed"" feature coupled with the planting of native vegetation). The intention is to create the appearance of a connected riparian corridor to encourage safe wildlife passage from the Santa Monica Mountains to the Simi Hills. However, the purpose of this project is to help wildlife cross the area until a more permanent solution (i.e. overcrossing) is put in place. Components of the project include: Modification of fencing immediately adjacent to the 101 freeway on the north and south side to expand habitat areas near crossing and help reduce/eliminate mountain lion attempts to cross the freeway; Installation of irrigation; Removal of hardscape parking lot by commercial property landowner; Design and installation of native habitat at former parking lot; temporary reclaimed water irrigation for plant establishment; Restoration planting to restore habitat on both sides of the freeway in adjacent open space, in freeway encroachment areas, and at underpass shoulder areas of Liberty Canyon.

MNVCA-5

Due to feedback received, the project team has removed the multi-use trail from the project, and a multi-use trail will not be built as part of this project.

These potential visitors along with millions of potential tourists - all with easy access off the 101 - recreating on and across the *world's largest wildlife crossing* would wreak havoc on this wildland area.

[<https://arc-solutions.org/wp-content/uploads/2012/03/Clevenger-et-al-2009-Banff-wildlife-crossings-project.pdf> <https://www.pc.gc.ca/en/pn-np/ab/banff/info/gestion-management/enviro/transport/tch-rtc/passages-crossings/faq/10>]

Another example, is the 2016 completion of a new \$9.5 million bridge (150 feet wide spanning 6 highway lanes) "just for wildlife overcrossing" in Tucson, Arizona, where, "officials closed the Oracle Road crossings to humans, their all-terrain vehicles, bikes and horses. Cameras mounted on them and throughout their approaches will help watch for trespassers to be cited, as well as mountain lions and sheep to be counted. Campbell called it a "grand closing" for the benefit of all species traversing the road." <http://www.azcentral.com/story/news/local/arizona-investigations/2016/05/11/95-million-bridge-just-wildlife-opens-near-tucson/32600077/>

If Caltrans and the project team want to build a people crossing for recreation, education,

etc., they should build it as a separate project.

An important determination that needs to be made in this study, is how to best record a covenant (or facsimile thereof) on the Liberty Canyon Wildlife Crossing to ensure that it is built for wildlife only, dedicated as such today, and remains wild and for wildlife only in perpetuity.

Caltrans should initiate the process now of working with the National Park Service to study and produce a savvy new regional plan - one that would address the dire needs

of wildlife

crossings

under and over freeways throughout Los Angeles County - an integrated, cost effective, efficient, timely approach and execution, to ensure the survival of our most threatened wildlife species.

Thank you again for this opportunity to comment on the Liberty Canyon Wildlife Crossing. We look forward to Caltrans addressing these questions and inadequacies in the

MND/EA.

Sincerely,
Carrie Baltin MNVCA President

Ronald Kosinski Deputy Director, Division of Environmental Planning California Department of Transportation District 7, Division of Environmental Planning 100 S. Main Street, MS-16A Los Angeles, CA 90012

Re: Liberty Canyon Crossing EA/MND

Dear Mr. Kosinski: The Malibu Coalition for Slow Growth has the following comments on the Liberty Canyon Wildlife Crossing Mitigated Negative Declaration.

We are strongly in favor of a wildlife crossing at the US-101, near Liberty Canyon Road,. This crossing is absolutely necessary to increase habitat connectivity lost due to habitat fragmentation created by the 101 freeway. Wildlife need to cross this freeway safely to prevent the continued inbreeding of the endangered mountain lions and other threatened species.

Alternative 2 is clearly the superior alternative minus the human recreational element which appears to us to defeat the very purpose of such a crossing. Humans have no place on a crossing intended for use by wildlife. Our preliminary research shows that successful crossings elsewhere do not include use by humans. Common sense says this is not a good idea to have human use on a crossing designed for wildlife. We do not have the expertise to know if the 48 foot or 54 foot width is the better option. Both are acceptable to us.

We would like a feasibility study of the use of the current Liberty Canyon underpass by wildlife. We were of the understanding that this underpass was to be upgraded to provide an attractive and safe crossing for mountain lions and other wildlife until the overpass was operational. There is no guarantee that needed funds will be raised for the crossing in the near future and until such crossing is constructed this would provide relatively inexpensive safe passageway for the wildlife to reach the other side of the freeway.

Along the lines of an underpass, if less expensive to construct than an overpass, we would like Cal Trans to explore the alternative idea of creating a tunnel since they have been created and used successfully elsewhere,

Thank you for considering our comments on this matter. .

Sincerely,

Patt Healy Co Founder,
Malibu Coalition for Slow Growth
6085 Paseo Canyon Drive, Malibu Ca 90265

MCSG-1

Thank you for your comment. Your support for the proposed project is acknowledged.

MCSG-2

Due to feedback received, the project team has removed the multi-use trail from the project, and a multi-use trail will not be built as part of this project.

MCSG-3

Caltrans, Resource Conservation District of the Santa Monica Mountains (RCDSMM), The Mountains Recreation and Conservation Authority (MRCA), and Santa Monica Mountains Conservancy (SMMC) have already begun construction of the Liberty Canyon Interim Project. The project will connect existing riparian areas both upstream and downstream of the 101 freeway by utilizing the current Liberty Canyon underpass (building a ""dry stream bed"" feature coupled with the planting of native vegetation). The intention is to create the appearance of a connected riparian corridor to encourage safe wildlife passage from the Santa Monica Mountains to the Simi Hills. Components of the project include: Modification of fencing immediately adjacent to the 101 freeway on the north and south side to expand habitat areas near crossing and help reduce/eliminate mountain lion attempts to cross the freeway; Installation of irrigation; Removal of hardscape parking lot by commercial property landowner; Design and

installation of native habitat at former parking lot; temporary reclaimed water irrigation for plant establishment; Restoration planting to restore habitat on both sides of the freeway in adjacent open space, in freeway encroachment areas, and at underpass shoulder areas of Liberty Canyon.

Dear Mr Kosinski, ~~PK~~

The wildlife crossing for the 101 freeway must be built.

In our "infinite wisdom" (not) man has taken so much of the open space away from the wildlife. I used to see cougars on my walks, in the Chatsworth hills. Now all I see are paved streets and more & more houses. It's deplorable! The animals need and deserve the crossing. Build it now!

Phyllis Kalenian
Chatsworth CA

PK-1

Thank you for your comment. Your support for the proposed project is acknowledged.

Caltrans Wildlife Crossing ^{NR}

The Monrovia High School Environmental Club has partnered with the organization *Save the Mascots* and together are in support of Caltrans's proposal of the Liberty Canyon Wildlife crossing. This overpass will give mountain lions, bobcats, and other animals a safe means to cross Highway 101. This will decrease the number of animal injuries residing in the area and provide drivers a peace of mind when driving near inhabited areas. This will allow a free flow of movement and animals establishing more healthy breeding habits in the nearby area. We prefer the Design Option 1, which has a more gradual slope and is easier for animals of all shapes and sizes. The second alternative would include a bridge and an extension over the Agoura Road. We are very happy that Caltrans has proposed this wildlife-crossing project because it will improve the health of mountain lions and other animals living in the Santa Monica Mountains. We want to do our part to preserve our environment and wildlife.

Signatures

Amanda Platz	Chloe Torres
Nick Giambalvo	SBickinson
Gabriel Garcia	Isabella Alva
Franklin Qy	Anthony Komoo
Gabriel Rosas	Torres
Ximena Infante	Gregory Feright
Isam torte	Maddy Zubiato

MHSEC-1

Thank you for your comment. Your support for the proposed project is acknowledged.

Fausto Cabas	Zoe Gathers
Jordan Brooks	Matthew Martinez
Andrew Carillo	Eduardo Mendez
Cathy Fong	Mu Saleh
Chelby Delgado	Albert Tihoro
Kirk McGinnis	Juan Valdez
Karla Glenn	Tom Dobson
Georgia Spencer	Ayman Saich
Anne de la Rosa	Olivia Mingo
Karmyl G	Olivia Mingo
Juan Velazquez	Alysa Blair
Angelina Alvarez	Eleana Torres
Alani Gutierrez	Joseph Bucher
Alyssa Holt	Diego Gomez
Marilyn Courtney	Karl M.
Oscar Infante	Vincent Juarez
Erin Pearson	Joseph Cortez
Lesly Jaj	Anthony Romero
Harold Aranda	Issac Mayo-Doran
Mia Millan	Aaliyah Barrios
Sydney Geffron	Emmy Ortiz
Alejandro Nava	Priscilla Preiling
Olivia Moran	Maya Martinez
Derick Corrales	Angelica Sarabia
Jose Ramirez	Sarah Conquillo
Valencia Wherry	Kira Reyes
Josh Iwai	Tanya Voykov
Jayland McElone	Krys Go
Valeria Muñoz	Shaylin Dani
Isabel Ibarra	
Marcus Sayles	

Janet Cen	Sierra Gonzalez
Christiana Hernandez	Ariana Bailey
Brianna Waters	Janette Ramos
Nicholas Stersiv	Jenelle Marquez
Sebastian Andrade	Victoria Aguayo
Citlalic Morales	Jolynne Noriega
Jose Zepeda	Ashley Munoz
Derick Powell	Haigh Phipps
Kayla Glenn	Marlynn Courtney
Jakob Dapper	Grant Dickinson
Valerie Ramirez	Ethan Bennett
Urbuen Ramo-Vega	Jaylen Bennett
Mia Millan	Isabella Thomas
Angelina Garcia	
Daniela Martinez	
Emma Bustamante	
Kyla Richardson	
Zachary Moore	
Anthony Rouse	
Kirin Nava	
Kayli	
Tyler	
Nathan	
Joshua	
Valerie	
Jessica Qui	
Eddie Cruz	
Sarah Bonquillo	
Ryanne Cinner	