

California Native Plant Society

May 28, 2008

Mr. Ronald Kosinski, Deputy District Director
California Department of Transportation, District 7
Division of Environmental Planning (I405/101 Connector)
100 S. Main Street – Mail Stop 16A
Los Angeles, CA 90012

Also transmitted by email to eduardo_aguilar@dot.ca.gov

Re: Draft Environmental Assessment 405-101 Connector Improvement Project

Dear Sirs:

These comments will supplement the comments previously submitted by the Los Angeles / Santa Monica Mountains Chapter of the California Native Plant Society.

On page 73 (2.1.6) in the paragraph describing the "Sepulveda Basin Wildlife Reserve Landscape Unit" you state that "Existing visual resources include established and newly planted willow, cottonwood, and sycamore trees, various shrubs, nesting, and foraging areas for migratory waterfowl and shorebirds." That is an incomplete description. The "various shrubs" represent the dominant natural community – mule fat / coyote bush scrub (*Baccharis salicifolia* / *Baccharis emoryi* and *B. pilularis*) – that regenerates itself without human help, and it is this emerging plant community that will be disturbed by the on and off ramps proposed to be built in the Wildlife Reserve. Furthermore, it is not just migratory waterfowl and shorebirds that utilize that area, but resident raptors that forage and passerines (such as mourning doves) that nest there.

On page 76, Figure 21 is not an accurate "Post-Construction Visual Simulation" of the site, as the ramps "disappear" into a forest of oak trees that would be partially displaced to accommodate the ramps.

On page 78, Figure 23 is also not an accurate "Post-Construction Visual Simulation" of the site, as the ramps "disappear" into a forest of oak trees that would be partially displaced to accommodate the ramps.

On page 87, paragraphs 4 and 5, you calculate the number of acres that would be covered by the new connector structures. However, nowhere in the document do you discuss the acreage cut-off from the Wildlife Reserve (by the connector structures) that would be rendered little value to wildlife due to its isolation. CNPS strongly believes that the entire footprint of the project including the area between the connectors, the dam face and Burbank Blvd. plus the "work area" around the site (that would be impacted during construction) be considered "sacrifice" zones and not valuable wildlife habitat.



Dedicated to the preservation of California native flora



On page 88, Mitigation Proposals, item 2 states: "Widening the existing dirt canal inside the basin between Route 405 and Woodley Avenue (Haskell Channel). This proposal will fulfill requirements to increase storage volume inside the basin and no water impounded." First off, Haskell Channel is better known as Haskell Creek – the centerpiece of the Wildlife Reserve. In fact, the area west of Haskell Creek was annexed into the Wildlife Reserve in order to make Haskell Creek the center of the Reserve, not the edge, because this riparian corridor of cottonwood and willow forest has the oldest, tallest and least disturbed areas within the Reserve. Any widening of the existing channel would likely require removing existing trees and this would not be acceptable. The implementation of this "mitigation" would destroy the only riparian forest in the San Fernando Valley.

On page 136, Biological Conditions in the Biological Study Area, you state that "the area at the southern point of the project [is] made up of primarily ruderal vegetation. Once again you ignore the presence of representatives of the dominant natural community – mule fat / coyote bush scrub (*Baccharis salicifolia* / *Baccharis emoryi* and *B. pilularis*) – that is the essence of this formerly ruderal area now (albeit slowly) returning to a natural community. This area was burned in a wildfire a few years ago and the shrubs that were burnt to the ground have not yet reached their former size.

On page 145, Table 41 Sensitive Species, states that for Davidson's bush mallow (*Malacothamnus davidsonii*) "the habitat within the project limits is not suitable for this species." That is incorrect. A population of Davidson's bush mallow is thriving on Hummingbird Hill, just west of the tunnel under Burbank Blvd., adjacent to the location of the proposed connectors.

On page 36 of the "Draft Section 4(f)/Section 6(f) Evaluation", you describe the acreage the proposed alignment would take from the entire reserve (225 total acres) as opposed to the area of the "north" Reserve of 48 acres (as you do on page 87 of the DEA/IS). You state "These easements will not alter the land use of the location; the primary uses of open space and recreation would be maintained." That statement is in error. The primary purpose of that area is wildlife refuge (not open space and recreation), as visitors are not even allowed to wander out into that area (the seasonal goose foraging area); and even if it were "open space and recreation," who would want to recreate under or adjacent to freeway onramps?

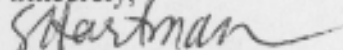
On page 37, 4-2.3 Measures to Minimize Harm, your list of possible measures includes the Sepulveda Wetlands Park Project, a project that was previously rejected by the Wildlife Areas Steering Committee, a project with a main purpose to treat reclaimed water, not enhance the wildlife values of the Sepulveda Basin. We also disagree with the suggestion for off-site mitigation, as there are plenty of unmet needs within the Sepulveda Basin.

Finally, nowhere does this proposal even mention the importance and significance of this wildlife area for the multitude of volunteers, school children, and Girl and Boy Scout

Troops who have spent countless hours for over two decades planting, weeding and caring for the plants; of the members of the Wildlife Areas Steering Committee who have spent over two decades and countless personal hours advising the City and the Army Corp of Engineers in the development of a wildlife refuge that could survive the existing urban onslaught yet still provide what your report calls "a high level of diversity of birds," or recognize the paucity of wildlife areas in the flatlands of the San Fernando Valley and how unique and rare the Sepulveda Basin Wildlife Refuge is – a truly a world-class urban wildlife refuge.

The traffic will continue to increase. Will we continue to remove wildlife reserves to accommodate growth? Or will we take a stand here and now, and put Earth health ahead of commute times. I am confident that the engineers at the California Department of Transportation can figure out a way to improve the connectors for the 101-405 freeways without impacting the existing Wildlife Reserve.

Sincerely,



Steve Hartman

Treasurer

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