

May 27, 2008

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

Re: I-405/U.S.-101 Connector Project

Dear Mr. Kosinski,

The Sierra Club just recently became aware that Caltrans is planning major modifications of the transition from the I-405 to the US-101. We have examined the alternatives as available in the Draft EA/IS, and the Club has adamantly opposed both Alternatives 2 and 3. If you are considering modifications to these or other alternatives, we request that we be notified as soon as they are available. We respectfully request that we receive notice of all subsequent actions or hearings on the project, and that our comments be addressed.

**Animal Species:** The report minimizes the impact on wildlife in the Reserve. This is the habitat of hundreds of species of migrating and resident birds, and a number of small mammals, coyotes and reptiles. Many of the migrating species are protected by the International Migratory Bird Treaty. Protecting the extremely limited wetlands and nearby habitat should be a primary concern. Our concerns are not focused simply on the noise and dust due to construction, nor the dust from periodic winds on the disturbed soil, which will make the Reserve uninhabitable during that period, but the continuing encroachment of freeway ramps which will reduce the number of acres available for wildlife. Much of the area which will be impacted is actually in an almost "human-free" zone where shy and sensitive species of birds may nest and procreate without even well-meaning birdwatchers disturbing them. This sort of habitat is extremely rare, especially in Los Angeles; we feel this impact has not adequately been assessed. Dust will also have a negative impact on the species that live in the Wildlife Lake: fish, crawfish, turtles, and frogs/toads. The species of carp that live in the lake are extremely sensitive to disturbances from noise, high winds causing rough water, and flooding that affect the lake which is, after all, in a flood control basin. The fish are frequently found dead along the shoreline. While a number of these species are non-native and considered invasive, they are food for the resident herons, egrets, osprey and migrating American White Pelicans. An inevitable decline in the small mammal population, due to dislocation during construction, and permanent loss due to loss of acres of habitat, will have a profound affect on the raptor population. Disruption of insect populations will have an affect on other bird species.

**Plant Species:** Since the Army Corps of Engineers constructed the dam and established the flood control basin, the Wildlife Reserve has undergone many changes, from barren land to a lush oasis. Over 60 years ago there were other enclaves of remaining native habitats in the San Fernando Valley, and maintaining habitat in this area was less of a concern. Now with the Valley covered with airports, business and industry, roads and houses, the percent of native habitat has shrunk to nearly zero. It has made the reconstructed habitat even more valuable. Native coastal live oaks and cottonwoods have been planted by environmental groups and a number of the oaks are just now reaching maturity. While great reaches of the basin are focused on recreation and displays of non-native plants, great efforts by Army Corps of Engineers, Los Angeles Parks and Recreation, and environmental

organizations, including the Sierra Club, participated in the planning for the restoration of natural habitat in this area. They continue their work now to control and remove non-native and invasive plants. The impact of soil disturbance due to construction will not only have a negative impact on the native vegetation and trees, but will promote the growth of non-native and invasive plant species.

**Threatened and Endangered Species:** The report minimizes the impact on threatened and endangered species; apparently none were actually seen at the time of the surveys, although the report indicates evidence of burrowing owls was found. We believe that this review must have been superficial at best and is inexcusable. The least bell's vireo uses the far southeast section of the reserve, as does the burrowing owl. Not seeing them in the project area, or in adjacent areas does not indicate that they are not there. Also, the importance of the area cannot be minimized simply because it is not uncommon for birds to be blown off-course or “just migrants”. Protecting “just migrants” is the whole idea behind treaties which protect species as they migrate. We know that other extremely sensitive species, such as the tri colored blackbird, yellow breasted chat, sharp shinned hawk, golden eagle and a number of others have been seen in the Reserve and surrounding habitat adjacent to the area proposed for Alternatives 2 and 3. As the Reserve continues to mature and change, and with the onset of global climate change, more and different species are likely to be found in the Reserve and surrounding habitat. There is no way to predict the changes in bird species in the Reserve, therefore it is important for them to have a place for food, rest, and solace between long journeys.

**Water Quality and Hazardous Waste Impacts:** There is a major fault in that there does not appear to be any safeguard of the water quality of the refuge area from pollutants generated by the new traffic, including sustained generation of particulates which will add additional load on the already impacted area from existing problems. Water moving slowly through wetlands is a major force in cleaning up polluted streams. That is one of the features that makes the Reserve valuable. Where will runoff from the ramps drain? into the the Los Angeles River? into the lake first and then the river? what will the mitigation be? Why, in the report, is there a neglect to refer to, even in the most general manner, what the best management practices are and how you intend to implement bmp for storm water runoff, not only during construction, but in the ramp design. The report indicates that the proposed constructed activities will include two new bridges over the Los Angeles River, which are anticipated to “result in the discharge of dredged or fill materials into waters”, and are anticipated to “divert, obstruct, or change the natural flow, bed, channel, or bank of any river, stream, or lake”, requiring permits from various state and federal agencies. This report absolutely minimizes these tremendous negative impacts on the Reserve. This is not just about the destruction of open space habitat, this is also about the damage and destruction to the riparian areas of Wildlife Lake, Haskell Creek and the Los Angeles River. For every square foot of impact to the Reserve, there should be at least a 5 for 1 mitigation provided-- preferably in the immediate area. Another concern not properly addressed in the report has to do with the 5 businesses located near the construction site, with risk classifications rating from moderate to high. Any contaminated soils moved or excavated from the risk areas must have special treatment, and cannot be mixed with uncontaminated soil. Where is the contaminated soil to be disposed?

**Impact Area/Volume:** The report indicates that Alternatives 2 and 3 will affect 41 ft (2.64 – 2.92) acres of the 225 acres of the Wildlife Reserve. The report makes clear that the Wildlife Reserve is fragmented into a number of sections: Haskell Creek, Burbank Blvd., Woodley Avenue, and the turf park which includes the Amphitheatre and restrooms. The report does not make clear that the project is to be built within the 60 acres that is the very heart of the Wildlife Reserve—the area most remote from humans on foot with their dogs, kites and ball games. This area, which includes protected Wildlife Lake, contains restored grasslands, woodlands and riparian areas that would be lost forever. We saw no mention of offsets or mitigation for this loss of habitat, and the new ramps will have the effect of exacerbating the existing fragmentation. The Sierra Club has been involved for a number of years in protecting natural corridors for wildlife so that populations are not isolated. There is no mention of any efforts to recognize the new barriers which the wider freeway right of way will pose, nor to mitigate the negative effects.

**Noise and lighting:** The report minimizes the irreparable damage to the soundscape during years of

construction. The noise will cause the Reserve to be uninhabitable for numerous species of wildlife, and will not be a place for the thousands of humans, who annually come to the Reserve, to commune with nature. Also, the report minimizes the effect of vehicle noise to the soundscape following completion of the project. The tranquility of the Reserve will be forever altered.

**Purpose and need:** While the mention of “capacity” in the report is explained as the expected increase in the volume of traffic by the year 2030, it does not mention that the “capacity” on the ramps includes “storage” for 500 vehicles for periods when traffic is stalled due to accidents or for large volumes of vehicles at peak times.

When the I-405/US-101 interchange was originally planned, there were obvious flaws in the engineering and projections of future use patterns, including the failure to plan for a smooth transition from southbound to westbound. This late attempt to fix the problem also seems to neglect projections for future use patterns. Publicly available reports indicate that people will be getting out of their cars and into public transportation as gasoline prices escalate. The Sierra Club supports these efforts to expand public transportation and is appalled that Caltrans continues to focus its funds and intellectual capital on freeways as opposed to aiding public transportation solutions. We note that there is little accommodation for public transportation options in this area, although the Metropolitan Transit Authority's Orange line is immediately north of the basin.

It is for these reasons the Sierra Club – Angeles Chapter is opposed to Alternatives 2 and 3, and any construction in the Sepulveda Basin Wildlife Reserve.

Sincerely,

Sharon Ford  
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