

SANTA MONICA MOUNTAINS CONSERVANCY

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June 26, 2006

Mr. David Bobardt
Planning Manager
City of Moorpark
799 Moorpark Avenue
Moorpark, California 93021

**Notice of Preparation Comments
Hitch Ranch Specific Plan (SCH No. 1999071010)**

Dear Mr. Bobardt:

The Santa Monica Mountains Conservancy offers the following comments on the above referenced proposal to construct 605 residential units and three acres of institutional use on approximately 282 acres adjacent to State Route 23 in the Santa Susana Mountains. We concur with the Initial Study that the proposed project could result in potentially significant ecological impacts in every possible category. We encourage the City to develop a range of Environmental Impact Report alternatives that better avoid, and then provide for the permanent protection of, the most valuable habitat resources on the subject property. The rapidly developing area surrounding the project should not be a reason to write off the natural values of the subject property. It should be the opposite and be a reason to maintain high quality, connected open space closer to the suburban edge.

The proposed project footprint demonstrates minimal avoidance of ecological constraints and essentially only provides for islands of open space where the City's limitations on grading slopes of a particular percentage prohibited footprint expansion. This letter contains numerous suggestions for minor footprint modifications that should not result in insurmountable economic hardships on the applicant. Our goal is a project that guarantees a substantial contribution to the Santa Susana Mountains ecosystem. The proposed 50 acres of natural open space (17 percent of the project area) divided amongst six mostly isolated pockets of open space does not approach that modest goal.

Need for DEIR Habitat Connectivity Analysis

The subject property remains moderately well connected to the core habitat of the Santa Susana Mountains west of SR 23. The property is also probably heavily used by numerous native reptiles, mammals, and birds including foraging raptors. The prior human disturbance reduces but far from eliminates habitat value. The argument that denuded

areas have permanently lost their ecological value is flawed because the majority of that habitat value lost from disturbance would return naturally over time.

The Draft Environmental Impact Report (DEIR) analysis must factor in both the existing habitat connectivity of the site and its habitat value despite the reported widespread disturbance. To adequately disclose the habitat connectivity of the project site to larger habitat areas, the DEIR must show all existing and entitled land uses surrounding the subject property. This connectivity analysis should include the prominent blueline drainage course that extends north from the Ventura County Flood Protection property located just west of the property boundary. In addition the DEIR must then describe the conditions in each habitat linkage leading to larger surrounding natural areas. The analysis should also factor in the opportunities and constraints of the power corridor easements that course through and along the subject property. If any proposed natural open space patch greater than acres in size appears to be slated for isolation from other natural areas, the DEIR should describe how that isolation must occur shy of not meeting the majority of the DEIR project objectives.

Need for Road Stub Growth -Inducing Impact Analysis

To sufficiently address potential growth-inducing and potential cumulative ecological impacts associated with the two prominent road stubs that extend west from proposed North Hills Parkway (approximately coinciding with the northern and southern limits of proposed debris basin number two), the DEIR must address how extensions of these roads would bisect habitat and lead to additional loss of habitat and wildlife corridors from the development they may facilitate .

Of these two road stubs, the proposed road stub leading to the northwest along the western edge of proposed debris basin number three has the potential to isolate the largest proposed open space lot in the project (Area VII). The other road stub in the southwest corner of the subject property would result in approximately eight acres of grading that otherwise has no integral relationship to the project described in the project description. That road stub also would isolate, or sever, eleven acres of high quality open space in Area VII.

These two road stubs are clearly project elements that are meant to facilitate development of several parcels located to the west. If the project applicant has a financial interest in any properties that benefit from these, or any other proposed road stubs, the DEIR should disclose that financial relationship and address the potential impacts to the subject properties.

A third road stub with an onsite cul-de-sac abuts Darlene Street in the northwest project corner. The construction of this road would result in the loss of over four acres of perhaps some of the highest quality habitat on the site. That obvious stub to connect to Darlene Street has no relationship to the project described in the project description.

The project description shall remain deficient until it includes the three described road stubs or eliminates them from the site plan and all other aspects of the project. If any of the subject road stubs remain part of the proposed project description, the DEIR must address how the increased traffic volume associated with flow through traffic and that generated from adjacent parcels would diminish the habitat value of the proposed project's natural open space areas.

Analysis of Extensive Debris Basin Acreage

The proposed project includes a minimum of 34 acres of water detention area, the majority of area being described as debris basin. The DEIR should describe this disproportionate amount of retention area for a project located along a major developed flood control channel (all along southern boundary). The DEIR must analyze how much offsite generated flow is being retained onsite. If offsite (or future offsite) generated flow is being retained onsite, the potential growth-inducing and potential cumulative impacts of that relationship to surrounding properties must be addressed in the DEIR.

The full potential of each proposed basin to ever need to be cleaned out (which would result in the near complete loss of riparian and wetland vegetation) must be fully disclosed in the DEIR. The DEIR must also disclose how much habitat mitigation is going to be credited to planting in the basins and if any of that credit would benefit other projects. If any of the credited mitigation habitat has any potential of needing to be periodically removed for maintenance, then that mitigation credit is erroneous.

Proposed Habitat Connectivity and Protection DEIR Alternative

The DEIR must include a project alternative that both guarantees a substantial contribution to Santa Susana Mountains ecosystem and maintains the bulk of the project objectives. The two most promising areas to connect the site's natural open space to larger natural areas to the north are the two northern corners of the proposed Specific Plan boundary. To maximize both the long term connectivity potential of the site and the total amount of protected, connected habitat, the entire northern boundary of the Specific Plan area must include a variable width band of contiguous habitat. Only through the incorporation of this permanent open space feature will there be an adequate probability of the site not becoming permanently isolated in the future.

This contiguous northern band of permanent open space would connect high quality open space in Area VII to a band of east-west oriented open space along the northernmost extension of the project to where proposed North Hills Parkway exits the site in the northeast property corner. To achieve this modest open space goal, an adequate wildlife corridor must be integrated through and/or around proposed detention basin three and along the western boundary of the large pad shown directly east of detention basin three. From that point to the northeast project corner, project elements would need to be slightly pulled towards the center of the project to maintain a minimum corridor width of 200 feet. That width is necessary because both sides to the corridor must be anticipated to present fairly intense suburban land use. A brief pinch point of 100-foot-wide where the eastern tip of detention basin three and North Hills Parkway converge is probably inevitable but far from optimal.

To create at least two onsite natural areas with a minimum of 30 acres of habitat, the residential area located west of Area VI would need to be reduced accordingly. Then the project would include two connected natural areas with high quality habitat interfaces with natural areas located to the north. If manufactured slopes with no fencing, no lighting, and 100 percent native vegetation are necessary to achieve this 30 acres that is acceptable if there is a conservation easement in favor of an open space agency such as the Mountains Recreation and Conservation Authority (MRCA).

The final component of this important DEIR alternative is to integrate the 34 acres of proposed drainage detention area into permanent, fully protected habitat area. If any portions of these detention basins are to provide permanent habitat resources, they should be connected to other natural areas. For example the Area V "open space and detention" should be linked to the Area VII open space area with a six-foot box culvert under proposed North Hills Parkway. If this culvert were to be made larger and also used for trail purposes that would also be acceptable.

Need for Fee Simple Natural Open Space Dedication

There is no guarantee that natural open space lots will retain their habitat resources in perpetuity unless they are dedicated in fee to a conservation agency with funding to monitor and protect the areas. As a result, setting aside open space as a condition of a tract map approval is only a partial mitigation measure. We urge the City to have the open space dedicated in fee to a park district or agency such as the MRCA. The landscape maintenance or community facilities district(s) for the project should then be required to permanently generate enough funding to allow a monthly ranger or ecologist visit. With all costs included that amount should be no less than \$5,000 annually.

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Please address any future correspondence to Paul Edelman of our staff at the above address and by phone at (310) 589-3200 ext. 128.

Sincerely,

ELIZABETH A. CHEADLE
Chairperson