

SANTA MONICA MOUNTAINS CONSERVANCY

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August 25, 2014

Mr. Dave Norman
Director of Community Development
601 Carmen Drive
Camarillo, California 93010

**Conejo Creek Specific Plan
Recirculated Draft Environmental Impact Report Comments
SCH No. 2009111020**

Dear Mr. Norman:

As the principal State land use agency for the Santa Monica Mountains Zone and surrounding watersheds, the Santa Monica Mountains Conservancy (Conservancy) offers the following comments on the Recirculated Draft Environmental Impact Report (RDEIR) for the Conejo Creek Specific Plan. The Conservancy previously submitted comments dated September 24, 2012 on the initial Draft Environmental Impact Report. That letter is attached and the Conservancy hereby incorporates these comments by reference. The Conservancy's primary concern is wildlife movement throughout the project area and through the Highway 101 Conejo Creek undercrossing in particular. The RDEIR remains deficient for not including a riparian-based habitat linkage alternative and not analyzing the regional habitat connectivity.

With its proximity to Conejo Creek, the Conejo Creek-101 freeway wildlife underpass, a 6,000-foot long section of unchannelized Calleguas Creek, and high quality habitat at the toe of Conejo Mountain, the subject property plays a significant role in maintaining regional habitat connectivity between the Santa Monica Mountains and portions of the Oxnard Plain located south of the 101 Freeway to both the Simi Hills (via Las Posas Hills) and the Santa Susana Mountains (via Calleguas Creek). The Conejo Creek undercrossing also provides the best, and the only, passage for large mammals for miles in either direction. The RDEIR significantly downplays the importance of Conejo Creek as wildlife corridor and remains deficient for not analyzing the regional habitat connectivity value of Calleguas Creek from its confluence with Conejo Creek northward across Highway 101.

The range of RDEIR alternatives is totally deficient because no development alternative adequately accommodates for wildlife movement through the project area from the Conejo Creek - 101 Freeway bridge to key habitat blocks to the south and southeast and along

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Calleguas Creek. In addition the RDEIR remains silent on how the proposed project would provide for permanently protected wildlife movement corridors from Conejo Creek to Conejo Mountain and what infrastructure impediments might exist in those wildlife corridors.

The Conservancy recommends a 500-foot natural buffer between any riparian feature (Conejo Creek or bypass channel) and the edge of development (see attached) and a 100-foot-wide fully protected habitat linkage corridor along the entire western property boundary that encompasses Calleguas Creek and buffer habitat. Such an open space configuration fully solves for both regional habitat connectivity along Conejo Creek and for high quality habitats of Conejo Mountain. It would also not preclude passive recreation uses such as trails or landscaped stormwater infiltration depression.

The Conservancy will continue to review and analyze the RDEIR and make further comments including comments regarding the gravid female steelhead prior to the September 20, 2014 deadline. Should you have any questions or clarification requests, please contact Paul Edelman, Deputy Director of Natural Resources and Planning, at 310-589-3200, ext. 128.

Sincerely,

LINDA PARKS
Chairperson