

SANTA MONICA MOUNTAINS CONSERVANCY

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August 26, 2019

Douglas Spondello
Planning Manager
City of Moorpark
799 Moorpark Avenue
Moorpark, California 93021

**Notice of Preparation Comments
Hitch Ranch Specific Plan**

Dear Mr. Spondello:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on the Hitch Ranch Specific Plan proposal to construct 755 dwelling units on approximately 271 acres in the Santa Susana Mountains west of State Route 23. The Conservancy previously offered comments regarding this development project in letters dated June 26, 2006 and May 21, 2012 and hereby incorporates those documents by reference.

A project that grades 2.5 million cubic yards of earth on 211 acres of the Santa Susana Mountains utilized by a broad complement of native mammals, birds, and reptiles would result in significant adverse biological impacts. The recent feature film *Biggest Little Farm* in Moorpark showed how much wildlife can exist in mixed agricultural and open space areas. Even if every square inch of the affected 211 acres was non-native annual grassland the biological impacts to wildlife habitat would be significant. Those significant impacts can easily be reduced and brought under a level of significance by reducing the grading footprint and providing more permanent natural open space. If they are not reduced the City must adopt a statement of overriding considerations.

The property's ability to provide both habitat and resources for many of the existing wildlife species would probably drop precipitously if the only open space was the proposed 29-acre lot in the northwest project corner.

The Conservancy urges the City to include multiple Draft EIR alternatives that reduce the project grading footprint by 25 and 50 acres, respectively, and add commensurate acres of permanent natural open space to the upper northwest region of the property with connectivity to other natural lands. As proposed 29 acres of functional natural open space out of a 271-acre property is a poor ratio to balance natural resources with development.

The proposed 25 acres of soft bottom debris/retention basins may have some ongoing wildlife habitat value, but if the Watershed Protection District cleans them out or fences them, those values are not enduring.

Groundwater Overdraft and Surface Water Quality

The proposed Project is located on the Moorpark anticline that divides the East Las Posas Groundwater Basin and South Las Posas Groundwater Basin both of which are part of the regional Fox Canyon Groundwater Management Agency (FCGMA). FCGMA is currently preparing Groundwater Sustainability Plans (GSPs) to address the chronic overdraft of groundwater in the agency's jurisdiction and reductions in surface water flows that impact water quality (primarily higher Total Dissolved Solids) within Arroyo Las Posas. In summary the DEIR must quantitatively address how this proposed project affects groundwater recharge.

The Project Description identifies Ventura County Waterworks District No. 1 (District No. 1) would provide water service to the Project. As documented on the District No. 1 website, 19-percent of all water distributed to District No. 1 customers is groundwater pumped from the Las Posas Groundwater Basin and 81-percent is imported State Water Project water.

Results of the GSP specific to the Las Posas Groundwater Basin must be included in DEIR analysis and Project related impacts related to maintaining groundwater production and surface water quality in Arroyo Las Posas.

Analysis of Extensive Detention Basin Acreage

The 271-acre project is predominantly undeveloped land which allows for the maximum storm water infiltration and groundwater recharge over a broad area. While it is encouraging that approximately 25 acres of new detention basins are being proposed as part of the project, the Project Description indicates these features are incorporated from the Ventura County Watershed Protection District's flood-control master plan related to the *Gabbert and Walnut Canyon Channels Flood Control Deficiency Study* (1997). These detention basins would then drain to the impervious Walnut Canyon Channel.

Because the City previously chose to construct concrete drainage channels—such as the Walnut Canyon Channel—to collect and transmit surface runoff as quickly as feasible into

Arroyo Las Posas and the Pacific Ocean, to counter that action every opportunity to retain storm flows that would normally support riparian habitat and recharge impacted groundwater basins must be evaluated within the subject DEIR.

The DEIR must analyze alternatives that include higher capacity and/or more numerous detention basins and designate detention basin(s) that will be allowed to accrue natural debris and support native vegetation for habitat. DEIR alternatives with reduced impervious surface area would better recharge groundwater and require less basin area and basin maintenance and must be included in the DEIR.

Despite the habitat fragmentation this project proposes, “naturalized” detention basins can provide multiple benefits: slow storm water rates allowing for increased infiltration, improve water quality via soil filtration and micro-organism activity, habitat refugia amidst urbanization, reduce heat-island effects of urbanization, and provide scenic resources for passive recreation.

Natural Open Space Dedications

The Conservancy also reiterates the need for the northwest corner designated open space lots to be dedicated in fee to a conservation or parks agency, and to establish a long-term funding mechanism (such as a developer-funded long-term maintenance fund, landscape maintenance district, or community facilities district) to preserve and maintain the open space lots in perpetuity. We urge the City to require the open space dedication in fee simple to a parks district or agency such as the Mountains Recreation and Conservation Authority as a condition precedent to the Tract Map recordation.

The ecological and public value of open space dedications cannot be adequately maintained for decades without a dedicated funding source for the management entity both to prevent and remedy human disturbance. Human pressures and pet visitation on open space will only increase over time. Many homes will be adjacent to this open space. It is imperative that the conditions of approval include a permanent funding mechanism to supply a minimum of \$20,000 annually with a CPI inflation adjustor to the open space management entity.

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Please address any future correspondence to Paul Edelman, Deputy Director Natural Resources and Planning, at the above letterhead address or by phone at (310) 589-3200 ext. 128.

Sincerely,

IRMA MUÑOZ
Chairperson