

**SANTA MONICA MOUNTAINS CONSERVANCY**

RAMIREZ CANYON PARK  
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PHONE (310) 589-3200  
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June 14, 2004

Greg Smith  
City of Thousand Oaks  
2100 E. Thousand Oaks Blvd.  
Thousand Oaks, California 91362

**Mont Clef Ridge NOP Comments**  
**SCH# 2004041074, HPD 2002-80**

Dear Mr. Smith:

The proposed Mont Clef Ridge development project is located within the Rim of the Valley Trail Corridor portion of the Santa Monica Mountains Conservancy (Conservancy) jurisdiction. The Conservancy is concerned about impacts to wildlife movement in the region, the biological resources on the project site, and the viewshed.

The changes between this revised Notice of Preparation (NOP) and the original project description will help to reduce the overall impacts of the project. The project is a critical parcel in the wildlife movement corridor between Wildwood Park and Joel McCrea Wildlife Preserve. This corridor segment is the most narrow choke point in a habitat linkage between the western end of the Santa Monica Mountains and the core of the Simi Hills (east of the 23 Freeway). This project site occupies a very narrow piece of land, where it is virtually impossible to build houses without compromising the wildlife movement and ecology of the region. Optimally, the entire parcel would be preserved for the wildlife movement corridor.

The NOP states that a conservation easement will be dedicated for the wildlife movement corridor that is between 250 and 400 feet in width and runs east-west. The conservation easement should be extended out from the current boundaries to include all of the ungraded portions of the project site. The corridor will be more effective with these protections. The conservation easement must be given prior to the issuance of any grading or building permits. Also, fencing off of the graded pads must be prohibited from the project site. Fencing impedes wildlife movement.

The Draft Environmental Impact Report (DEIR) must include photometric mapping of all of the light spillage on the project site and adjacent land. Every attempt should be made to keep lighting impacts to a minimum. This effort can include (1) the installation of low pressure sodium lights, which produce light in a spectrum that attracts the fewest number of moths and insects, (2) no roof-mounted lighting structures, (3) no light source exceeding 250 watts, (4) all exterior lighting directed downward, (5) the installation of lighting controlled by sensors, and

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(6) light sources not exceeding one footcandle of illumination shall be placed within 100 feet of the edge of development area next to any open space or undeveloped land.

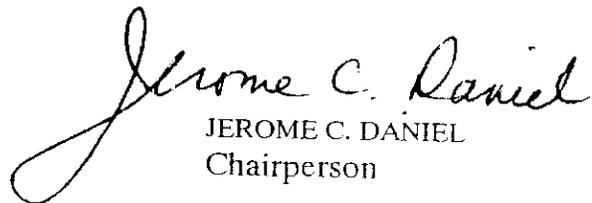
The conservation easement, the EIR mitigation measures, and the Conditions of Approval must include enforceable restrictions on the spillage of light from the homes. The limits must be easily measurable.

The conditions should also include a vegetation restoration plan for all disturbed surfaces in the easement area. To be successful this plan will require weed removal and replanting over a minimum two year period.

The DEIR must also include an alternative where only the two southern houses are built on the project site. Under this alternative, the conservation easement must be a minimum of 400-feet in width. Allowing only the two houses in the south prevents the property and conservation easement from being bisected by the road that was proposed to access the two houses on the northern edge of the property. Under this alternative, this critical choke point in the wildlife movement corridor will be constricted to a lesser degree.

The Conservancy appreciates the opportunity to comment. Please direct any questions or future documents to Paul Edelman of our staff at (310) 589-3200 ext. 128 and at the above Ramirez Canyon Park address.

Sincerely,

  
JEROME C. DANIEL  
Chairperson

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January 8, 2004

Mr. Greg Smith  
Environmental Services Section  
City of Thousand Oaks  
2100 Thousand Oaks Boulevard  
Thousand Oaks, California 91362

**Review of DEIR No. 320-LD 249 / HPD 2002-80 (Dubin)**

Dear Mr. Smith:

Per your request I have reviewed the DEIR for the above referenced project and the attached reference materials. The project as currently proposed and conditioned could have a significant adverse affect on east-west wildlife movement along Montclef Ridge. My suggestions to remedy those potential significant impacts is based on the premise that the pad locations and sizes on parcels 1-4 are more or less fixed and that lots 1 and 2 of LD 689 are developed or fully permitted. It addition it is assumed that all of the non-shaded area (on site preservation area) on the large grading and site plan map will be protected by a conservation easement that forbids all uses except fuel modification.

The only means of reducing potential significant impacts to wildlife movement and habitat connectivity on this project to an acceptable level is to create a minimum 250-foot-wide conservation easement between the pads for parcels 1 and 2 on the south and parcel 3 on the north. This width is mandatory because all of the habitat within and adjacent to the proposed easement will be compromised by brush clearance, driveways, lighting, drainage, pets, noise, traffic, irrigation moisture, and human presence. Any other scenario would result in a suburban gauntlet along a major habitat linkage. The objective of a habitat linkage is not just to allow occasional movement of larger mammals but to allow the full range of habitat processes such as the movement of plant materials and reptiles. The Glen Lukos Associates report omits discussion of potential impacts to reptile movement.

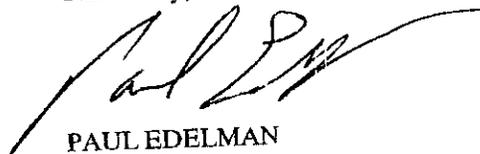
The conservation easement should have only two allowable uses, proposed driveways and fuel modification as required in writing by the fire department. Temporary drip irrigation for native plant revegetation should also be allowed. All other uses must be restricted, including fencing and non-native vegetation. The most difficult condition to write and enforce will be the limitations of light spilling into the easement. The conditions must be written to strictly limit any spillage of light. The limits must be easily measurable for enforcement.

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The conditions should also include a stringent vegetation restoration plan for all disturbed surfaces in the easement area. To be successful this plan will require weed removal and replanting over a minimum two year period. It appears that this revegetation area could approach a half acre in size. The cost of such an effort could exceed \$50,000 from start to finish. It is to the developers' advantages to minimize grading and soil disturbance to thus minimize mitigation costs.

The regional importance of the Montclef Ridge corridor warrants a solid contribution from every affecting development. I apologize for the delay and brevity of my response. However, the above program should mitigate the habitat linkage impacts to a level less than significant, if and only if, every aspect is carried out as written.

Sincerely,



PAUL EDELMAN  
Deputy Director  
Natural Resources and Planning