

SANTA MONICA MOUNTAINS CONSERVANCY

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October 22, 2007

Mr. Daniel Klemann
Ventura County Planning Division
800 S. Victoria Avenue
Ventura, California 93009-1740

**LU07-0073 (CUP) Eternity Bible College, Cornerstone Community Church,
Children's Hunger and Learning Center**

Dear Mr. Klemann:

The Santa Monica Mountains Conservancy (Conservancy) has reviewed the Eternity Bible, Cornerstone Community Church, Children's Hunger and Learning Center, LU07-0073 (CUP), project (Project) materials. We offer the following comments based from on the applicant's commercial and industrial permit application packet regarding open space preservation, wildlife movement, and impacts on biological resources. The Project application cites the Religious Land Use and Institutionalized Persons Act (RLUIPA) of 2000. The applicant has the right to cite this act, however, the appropriate CEQA review be required due to the location and description of the proposed Project. As currently configured and mitigated, it is apparent that the proposed Project would result in unavoidable significant adverse impacts to biological and visual resources.

The Tierra Rejada Greenbelt

The Project location is within the Tierra Rejada Greenbelt and adjacent to a key wildlife linkage route through the Simi Hills and between the Santa Susana Mountains and Santa Monica Mountains. The Tierra Rejada Greenbelt Agreement was established in 1983 for the protection and conservation of open space for the ecological value of the area. Since the Ronald Reagan Library was first constructed the cumulative impacts of all developments in the Tierra Rejada Valley has diminished the capability for wildlife to move from north of Tierra Rejada Road, to crossings at State Route-23 and south across Olsen Road. The rapid development of the area located just east of State Route-23, and both north and south of Tierra Rejada Road, has reduced, but not eliminated, the value of the north-south wildlife corridor. Experts are now expanding the Tierra Rejada Valley wildlife

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corridor protection to include the east-side of the valley. Because of the on-going diminution of the corridor, every project that reduces the dimension of the corridor could result in significant adverse impacts to wildlife movement. The Conservancy recommends that the County fully analyze these potential impacts. That analysis must include the impacts of the Project's proposed design on the infringement of the wildlife corridor.

Save Open-Space and Agricultural Resources - SOAR

The Project uses the RLUIPA to be exempt from the SOAR initiative. However, the large scope of the project must not excuse the applicant from mitigating and analyzing potentially significant adverse impacts under CEQA. SOAR and CEQA are different. The majority of the Project is dedicated to the construction of Cornerstone Church. To accommodate the size of Cornerstone Church's congregation the Project proposes a parking lot of 1,700 spaces with the potential of an additional 500 spaces.

The Conservancy disagrees with the Project description that "SOAR may be a land use regulation that *'limits or restricts the development'* of the church in a manner which could treat the church on *'less than equal terms with a nonreligious assembly or institution.'*" As stated earlier, the current condition of Tierra Rejada Valley and the cumulative impacts from prior and current developments within the area have greatly diminished the ecological integrity of the area. If the proposed project design was presented by a non-religious entity the same CEQA review standards would apply.

Reagan Legacy Trail and Wildlife Corridor

The Project application is deficient in not adequately addressing potentially significant adverse viewshed and biological impacts. The proposed Project plans show that the layout of the Project will be built up to and directly against the eastern boundary of the subject parcel. The parcel east of the Project parcel is owned and maintained by Rancho Simi Recreation and Park District. The proposed Reagan Legacy Trail and Wildlife Corridor runs through this property (see enclosed map). With support from Rancho Simi Recreation and Park District, Conejo Open Space and Conservation Authority, National Park Service, State Parks, Santa Monica Mountains Trail Council, The Nature Conservancy, City of Simi Valley, and the National Park Service's Rivers and Trails Conservation Assistance Program, the protection and implementation of the proposed trail and wildlife corridor is of a high priority. While the Conservancy supports the Project's intent of restricting future development on the hillsides and ridgelines of the property, the Project must provide an adequate analysis of potential project impacts on the viewshed resources with respect to the

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Reagan Legacy Trail.

Project Disconformity to Terrain and Ecological Constraints

The dedication of 80-acres of undisturbed habitat does not outright mitigate a big project with over a million cubic yards of grading. The Project must provide all relevant biological surveys as part of an adequate CEQA review prior to its consideration by decision makers. The RLUIPA does not exempt any Project from avoiding and mitigating potentially significant environmental impacts. In addition, the applicant must describe why other alternatives with potentially less damaging impacts do not need to be considered.

The Project's application is also deficient in addressing traffic and parking impacts. If it is anticipated that the County of Ventura may require the widening of Tierra Rejada Road, and may require additional grading and the construction of retaining walls, the Project must address the environmental impacts associated with the widening of the road and the potential construction of retaining walls. In addition, the Project states that an additional, or future, 500 parking spaces are part of the project design. The Project must also adequately analyze the potentially significant adverse impacts of this potential increase in scope or it is a clear cut case of CEQA project piece meal.

Based on the location of the Reagan Trail and Wildlife Corridor, the Conservancy recommends that a 150-foot-wide buffer zone be included along the east-side of the Project site, bordering Rancho Simi Recreation and Park District property. The 150-foot-wide buffer zone is necessary to provide adequate habitat connectivity, preservation of scenic resources, and relief from brush clearance obligations for Rancho Simi Recreation and Park District (RSRPD). The RSRPD would be the obvious entity to receive the dedication. However, if the RSRPD declines, we recommend that the applicant contact the Mountains Recreation and Conservation Authority (MRCA) as the primary recipient of the proposed 80-acre donation. By dedicating the undeveloped portions of the Project parcel to a public agency, the preservation of ridgelines, viewsheds, and open space will contribute to the recreational and ecological value of the proposed Reagan Legacy Trail and Wildlife Corridor.

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We respectfully request to receive all future project documentation to be sent to the
attention of Paul Edelman, Deputy Director of Natural Resources and Planning, at the
above address and that questions be directed to his attention at (310) 589-3200, ext. 128.

Sincerely,

ELIZABETH CHEADLE
Chairperson