

SANTA MONICA MOUNTAINS CONSERVANCY

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MALIBU, CALIFORNIA 90265
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Agenda Item 12
SMMC
5-24-10



October 23, 2006

RECEIVED

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Dept of Environmental Services
Planning Division

Mr. Tom Preece
Environmental Services Department
City of Simi Valley
2929 Tapo Canyon Road
Simi Valley, California 93063

**Comments on CUP-S-432 Light Industrial Park
Alamos Creek and Arroyo Simi Confluence**

Dear Mr. Preece:

The Conservancy appreciates the City's efforts this year to permanently protect an intermountain range habitat linkage between the 118 Freeway and the Arroyo Simi just west of Alamos Canyon (All Valley R.V. Storage). Much work remains to finish the primary connection along Alamos Creek between the Union Pacific railroad tracks and the Arroyo Simi. The conditions placed on the above-referenced project on 11 acres will have a great bearing on the function of this primary connection between the Santa Susana Mountains and the Simi Hills. In addition, the final amount and the configuration of permanent habitat protection on the City's abutting property along Alamos Creek will have equal or greater bearing on the success of this wildlife corridor.

The sensitivity of this site warrants comments prior to the circulation of an environmental document as solicited by your department. In the environmental document, we respectfully request that the City include a detailed analysis of how the subject project and the City's adjacent ownership collectively provide a critical section of habitat linkage between Los Angeles Avenue and the Arroyo Simi. Both the subject private property and the City's public property must make significant contributions of permanent, unfenced open space for the corridor to work. The Conservancy in conjunction with the Mountains Recreation and Conservation Authority (MRCA) is working to acquire 2.66 acres located on the north side of Los Angeles Avenue to secure a protected area up to the Union Pacific rights-of-way. The final piece must come from the Waste Management-owned property that straddles the 118 Freeway and ties into the core habitat of the Santa Susana Mountains.

The most significant narrowing of the existing habitat linkage occurs where the Alamos Creek channel transitions from City-owned property to the subject property. As depicted on the site plans, in this location both the existing storage yard on the subject property and

the City property are fenced approximately 30 feet from the centerline of the channel. Thus an approximately 250-foot-long section of the wildlife corridor is constricted to an approximate width of 60 feet because of fencing.

A sixty-foot-wide section of wildlife corridor in this specific section is not wide enough for a highly functioning inter-mountain range wildlife corridor, particularly given the significant constrictions directly upstream at the Los Angeles Avenue Alamos Creek undercrossing and at the Union Pacific railroad tracks. Those adverse conditions will worsen with both the approved and contemplated development (including road widening and street lighting) along the subject section of Los Angeles Avenue. The best corridor design adjustment to compensate for bottlenecks is to maximize the width and habitat quality on both sides of the constriction. In addition every effort should be made to expand the width of the constriction (even for short segments) and also to maximize habitat quality which includes minimizing lighting and other development disturbances along the corridor.

As stated, a functional corridor can only exist with significant land contributions both from the subject property and the City. The other variable is the minimum distance between the primary vegetated riparian channel and developed or lit area. The condition where the channel of Alamos Creek flows directly against the existing pad and fenced area of the subject property is the least optimal configuration. A combination of principles from conservation biology and fluvial geomorphology dictate the need for a buffer area along riparian corridors.

To achieve an adequate wildlife corridor contribution from the subject property, we recommend first that all of the land currently shown on the version of the plans dated July 2006 that is not within the fenced area, or limits of grading, be permanently protected by a conservation easement to the MRCA. That easement would prohibit all uses except up to 30 feet of brush clearance. Secondly, that the permanent disturbance footprint of the proposed project be moved sixty feet away from the shown creek line (dashes and dots) from the eastern project boundary to a point 180 feet south-southwestward of that project boundary. That sixty-foot-wide buffer would include no rip-rap or fencing and would also be protected by a conservation easement to the MRCA.

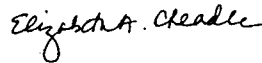
For the next hundred feet of creek line downstream from this point, the permanent disturbance footprint of the proposed project should be moved forty feet away from the shown creek line (dashes and dots) from the diagonal project boundary. That forty-foot-wide buffer would include no rip-rap or fencing and would also be protected by a conservation easement to the MRCA.

City of Simi Valley
CUP S-342
October 23, 2006
Page 3

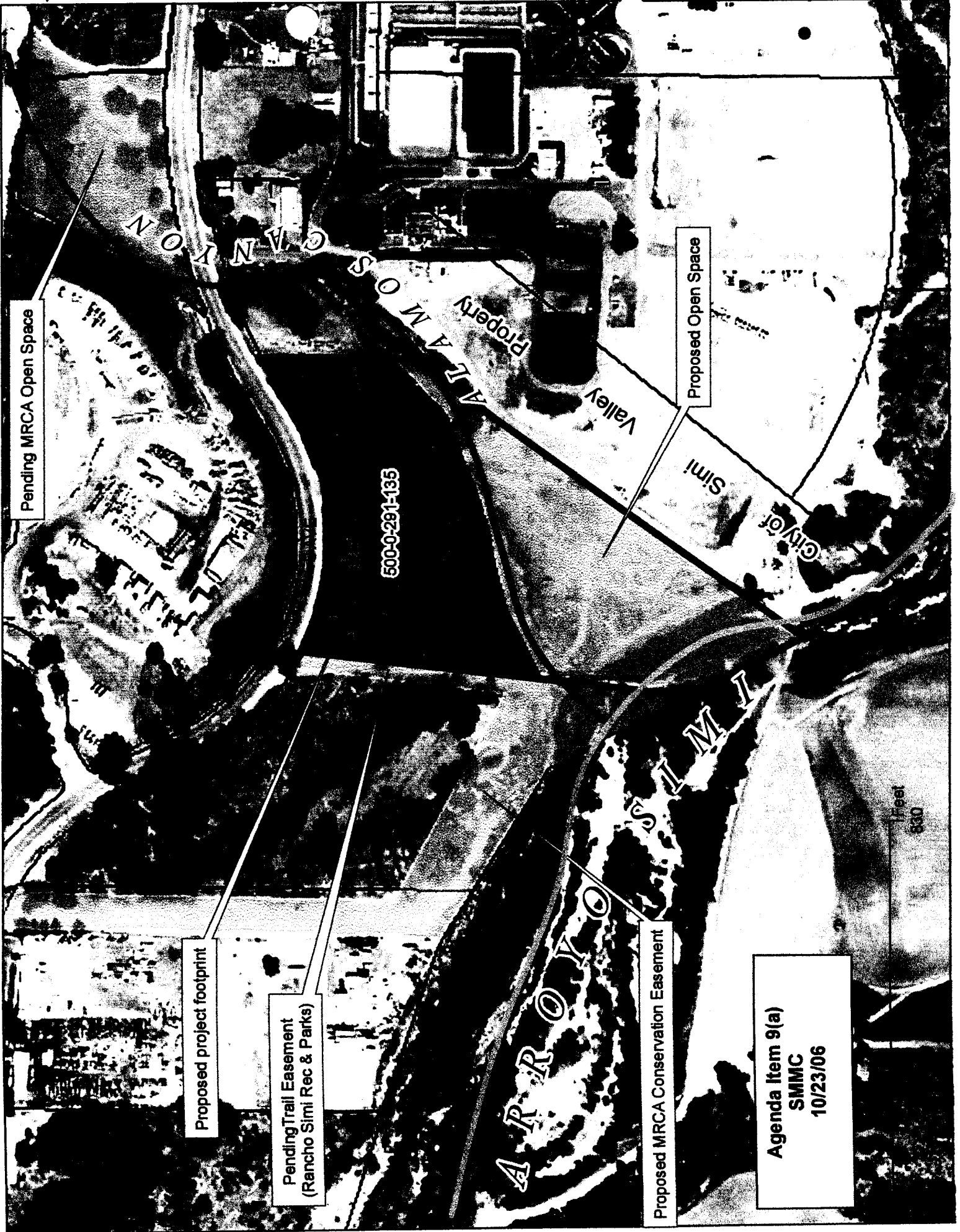
The incorporation of those project changes along with conditions to keep lighting levels low would constitute adequate mitigation for the proposed project if the conservation easements are dedicated prior to any permits being issued. That mitigation adequacy is contingent on the City of Simi Valley providing equal or greater protections on its adjacent property.

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

Sincerely,



ELIZABETH A. CHEADLE
Chairperson



Pending MRCA Open Space

Proposed project footprint

Pending Trail Easement
(Rancho Simi Rec & Parks)

500-0-291-135

Proposed MRCA Conservation Easement

Agenda Item 9(a)
SMMC
10/23/06

Proposed Open Space

101 Freeway
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