

SANTA MONICA MOUNTAINS CONSERVANCY

RAMIREZ CANYON PARK
5750 RAMIREZ CANYON ROAD
MALIBU, CALIFORNIA 90265
PHONE (310) 589-3200
FAX (310) 589-3207



June 18, 2010

Ms. Lauren Funaiole
City of Simi Valley
2929 Tapo Canyon Road
Simi Valley, California 93063

**Proposed Recreational Vehicle Storage Facility and Contractor Storage Yard
890 and 900 West Los Angeles Avenue
Mitigated Negative Declaration**

Dear Ms. Lauren Funaiole:

The subject property is located in a regionally significant wildlife corridor between the Santa Susana Mountains and the Simi Hills. The Santa Monica Mountains Conservancy (Conservancy) is concerned with the cumulative effects of development on wildlife movement through this constrained corridor. The Conservancy is additionally concerned with potential impacts to the Arroyo Simi, which remains in a natural state adjacent to the subject parcel. The Mitigated Negative Declaration (MND) identifies these potentially significant impacts, but does not require a sufficient buffer for biological resources or a legal mechanism to ensure their protection in perpetuity.

The Conservancy is very familiar with this site as it is adjacent to the All Valleys RV Storage facility. The mitigation measures for the All Valleys project were comprehensive and required a restoration buffer area along the edge of the Arroyo Simi and a 100-foot-wide wildlife corridor along the shared property boundary with the subject project. Both these natural areas were required to be protected by a conservation easement, which will be transferred to the Mountains Recreation and Conservation Authority (MRCA). Conditions warrant that the required mitigation for the proposed project should be comparable to that of the neighboring project.

The existing condition of the subject property is severely degraded due to past unpermitted use. The MND appears to evaluate impacts against this degraded baseline, which has the practical effect of reducing the amount of environmental mitigation that would otherwise be required. Had the applicant not altered the state of his property without permits, its habitat value would be greater. The City should therefore utilize a less disturbed baseline for portions of the property developed without permits so as not to reward the applicant's disregard for City code.

Ms. Lauren Funaiole
890 and 900 West Los Angeles Avenue MND
June 18, 2010
Page 2

Adequate protection of the Arroyo Simi riparian corridor and buffering of the All Valleys wildlife corridor necessitates that stronger biological mitigation be required of the applicant. The proposed buffer area should match that required on the adjacent All Valleys property, which is no less than 150 feet from the southern property boundary. This will provide a consistent edge between the natural and developed areas of the two properties. Additionally, the buffer area should flare out on the southeast corner of the property to create a funnel for the wildlife corridor on the adjacent property.

The applicant must construct and maintain a masonry wall to shield the wildlife corridor from the effects of industrial activity on the subject property. Noise, stray light, domestic animals, and other impacts associated with human use adversely affect wildlife movement patterns. The City's proposed buffer area planting requirements are sufficient.

Most importantly, the buffer area must be protected by a conservation easement to ensure its maintenance in perpetuity. Given the applicant's past code compliance issues, only a recorded third party enforcement mechanism would provide the needed protection. The MRCA is available to accept such an easement. The applicant should pay for the legal description, recordation, and a preliminary title report.

Given the proposed project's location between a city-owned protected open space parcel and a wildlife corridor easement, the required biological mitigation should reflect this context. If you have any questions, please contact me at (310) 589-3200 ext. 128.

Sincerely,



PAUL EDELMAN
Deputy Director
Natural Resources and Planning