

SANTA MONICA MOUNTAINS CONSERVANCY

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April 25, 2011

Sean Gibson
Department of Environmental Services
City of Simi Valley
2929 Tapo Canyon Road
Simi Valley, California 93063

**Comments on Hummingbird Nest Ranch
Draft Specific Plan Adjacent to Rocky Peak Park
SP-S-0029, CUP-2-0739, GPA-0083**

Dear Mr. Gibson:

The subject 125-acre property is bound on four sides by parkland owned by the Mountains Recreation and Conservation Authority (MRCA) and the Rancho Simi Recreation and Park District. That parkland is integral to a major core habitat section of the Santa Susana Mountains. The proposed project would locate a wide variety of structures and uses within feet of this public wilderness boundary. Some of the structures would be subject to fire damage if there was not substantial brush clearance on the subject public parkland. The Conservancy objects to any new project components that would require clearance on MRCA or RSRPD parkland. Given the ecological sensitivity of the site, the project should demonstrate that there will be no substantial indirect ecological impacts that cross over into parkland. Good planning would set all uses involving any turf or lighting a minimum of fifty feet from parkland.

The project design should also demonstrate that the main spring and all downstream portions of the creek on the property are fully accessible to wildlife and that none of there ecological value is compromised. We urge the City to request that the applicant voluntarily agree to a condition to provide a conservation easement that is contiguous with parkland around the spring and the entirety of the creek.

An accumulating body of scientific evidence is revealing how detrimental night lighting is to natural systems. We urge the applicant to put forth the most advanced lighting plan and mitigation measures to address this issue. The Conservancy also requests exhaustive state of the art studies on how much light trespass there could be from the proposed project and any alternatives.

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In summary the proposed project could potentially be designed to work well with the environment but with the information presented to the Conservancy to date, an Environmental Impact Report is warranted to assure the consideration of alternative projects that would not result in both significant direct and indirect impacts to public open space that is part of the Santa Susana Mountains core habitat. Because a General Plan Amendment is required we urge the City to require both a plan and mitigation measures that have no substantial impacts on any parkland. That parkland was dedicated as mitigation for other projects and thus should not be subject to avoidable impacts from all new projects.

Please address any questions and all future correspondence to Paul Edelman of our staff at the above letterhead address, by phone at (310) 589-3200 ext. 128, and by email at edelman@smmc.ca.gov.

Sincerely,

ANTONIO GONZALEZ
Chairperson

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