

SANTA MONICA MOUNTAINS CONSERVANCY

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September 26, 2011

Ms. Lauren Funaiole, Senior Planner
City of Simi Valley
2929 Tapo Canyon Road
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**Simi Valley General Plan Update
Draft Environmental Impact Report**

Dear Ms. Funaiole:

The Santa Monica Mountains Conservancy (Conservancy) is the principal State planning agency responsible for preservation of wildlife habitat, movement corridors, and open space in and around the City of Simi Valley. The City is conducting a comprehensive update to its General Plan that focuses future development in strategic areas within the City while providing for the protection of the valley's scenic setting and its residents' quality of life. The Conservancy has reviewed the Draft Environmental Impact Report (DEIR) for the General Plan Update and offers the following comments.

In general, the plan includes appropriate policies to protect biological resources and provide for mitigation in the event of their loss. In particular, the plan includes policies that protect hillsides, riparian corridors, open space, wildlife corridors, and habitat connectivity, which are all critical landscape features for maintaining the region's biodiversity. With strong implementation of these protections, the City will ensure that residents enjoy the benefits of interconnected, thriving ecosystems for generations to come.

The Conservancy offers specific comments and requests clarification on several policies:

Policy NR-1.5: Are there proposed Development Code amendments that would affect biological resources?

Policy NR-1.7: The Conservancy finds development agreements to be an inferior mechanism for protecting open space in perpetuity. Without a conservation easement in favor of an appropriate agency, there is little to no third-party enforcement of development conditions after a project is built. The policy should be revised to specify that development agreements must include conservation easements in favor of a public park and open space agency.

Policy NR-1.8: Does this policy propose establishing a formal Transfer of Development Rights (TDR) program? The Conservancy strongly supports creating programs that provide economic incentive for preservation of open space. Other jurisdictions, such as the County of Los Angeles and the City of Santa Clarita, are including establishing TDR programs as part of their respective general plan updates. The Conservancy recommends that the City look to follow their example in this respect. This Policy should be accompanied by an implementation program to create a TDR program in the medium term.

Policy NR-2.4: This policy should be revised to address light and noise that might deter wildlife from traveling where they are otherwise “able”. The Conservancy suggests this language:

Habitat Connectivity. Ensure that projects within areas identified as regional wildlife corridors are designed and constructed so as to preserve the ability of wildlife to travel through the region. Projects shall be designed to minimize edge effects, such as light and noise, that might deter wildlife from using corridors.

Policy NR-2.5: The Conservancy recommends specifying 5:1 as a minimum that can be increased if recommended by the Department of Fish and Game. The sentence would be revised to read: “Off-site replacement habitat should be at a minimum of 5:1 replacement ratio or, if recommended by the California Department of Fish and Game, at a greater ratio as needed to fully mitigate impacts and encourage impact avoidance.”

In addition to the previous policy comments, the Conservancy has reviewed the land use map and proposed areas of change. The Conservancy is particularly concerned about the West End Specific Plan Area (Area 6), which straddles Alamos Canyon and lies wholly within the South Coast Missing Linkages area. While the DEIR does not describe in detail what is proposed for this area, that it is identified as a target area for growth at all is deeply troubling. Alamos Canyon provides the primary wildlife crossing of SR-118 to the west of Simi Valley. Along with the Santa Susana Pass linkage, this corridor provides an essential pathway for individuals and genetic material to flow from the Santa Susana Mountains through the Simi Hills to the Santa Monica Mountains. Any development that reduces wildlife movement through Alamos Canyon would constitute a significant impact on biological resources throughout the Simi Hills and Santa Monica Mountains, threatening the persistence of top predators in these mountain ranges. The Conservancy requests

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additional information about the development proposed in this area so that further analysis and comments may be provided.

If the General Plan Update targets this area for development, biological resources will inevitably be significantly impacted. There are not enough possible mitigation measures that would make an auto dealership or business park complex compatible with regional wildlife movement in this location, given the intensity of those uses and traffic they generate. Road improvements alone in this area would decimate wildlife mobility. Given that the subject area consists of multiple parcels with varied ownerships, these impacts are properly addressed at the plan level. To reduce the biological resource impacts of the General Plan Update to be less than significant, the Conservancy recommends directing growth away from this sensitive location toward areas in the City that can truly accommodate it. Alternatively, policies that explicitly define large buffer areas and specific crossing improvements are needed.

Thank you for the opportunity to comment on the City's General Plan Update. With the additional information requested above, the Conservancy may be able to provide further comments. If you have any questions, please contact Paul Edelman, Deputy Director of Natural Resources and Planning, at (310) 589-3200, ext. 128.

Sincerely,

ANTONIO GONZALEZ
Chairperson