

SANTA MONICA MOUNTAINS CONSERVANCY

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May 21, 2012

Joseph R. Vacca
Principal Planner
City of Moorpark
799 Moorpark Avenue
Moorpark, California 93021

**Notice of Preparation Comments
Hitch Ranch Specific Plan**

Dear Mr. Vacca:

The Santa Monica Mountains Conservancy offers the following comments on the above referenced proposal to construct 755 dwelling units on approximately 277 acres at the southeastern corner of that portion of the Santa Susana Mountains on the west side of State Route 23. We concur with the Initial Study that the proposed project could result in potentially significant ecological impacts in every possible category. We encourage the City to develop a range of Environmental Impact Report alternatives that better avoid, and then provide for the permanent protection of, the most valuable habitat resources on the subject property. The rapidly developing area surrounding the project should not be a reason to write off the natural values of the subject property. It should be the opposite and be a compelling reason for the citizens of Ventura County to maintain high quality, connected open space closer to the suburban edge. A series of recent wildfires on the site do not diminish its long term ecological contribution to the Santa Susana Mountains ecosystem.

The proposed project footprint demonstrates a bare minimum of avoidance of ecological constraints and essentially only provides for islands of open space where the City's limitations on grading slopes of a particular percentage prohibits project footprint expansion. This letter contains one major recommendation for a footprint modification. The DEIR must include a project alternative that both includes 50 contiguous acres of protected natural open space north of the proposed section of North Hills Parkway and maintains the bulk of the project objectives. The Conservancy's goal is a project that guarantees a permanent substantial contribution to the Santa Susana Mountains ecosystem. The currently proposed non-contiguous, road-bisected 55 acres of natural open space does not approach this 50 acres of contiguous habitat goal.

Need for DEIR Habitat Connectivity Analysis

The subject property remains well connected to the core habitat of the Santa Susana Mountains west of SR 23. Wildlife must only cross two-lane rural roads. The property is also probably heavily used by numerous native reptiles, mammals, and birds including foraging raptors. The prior human disturbance reduces but far from eliminates habitat value. The argument that denuded areas have permanently lost their ecological value is flawed because the majority of that habitat value lost from disturbance would return naturally over time with no cost or human intervention.

The Draft Environmental Impact Report (DEIR) analysis must factor in both the existing habitat connectivity of the site to the Santa Susana Mountains and its habitat value potential despite any surficial degradation. To adequately disclose the habitat connectivity of the project site to larger habitat areas, the DEIR must show all existing and entitled land uses surrounding the subject property. This connectivity analysis should include the prominent blueline drainage course that extends north from the Ventura County Flood Protection property located just west of the property boundary. In addition the DEIR must then describe the conditions in each habitat linkage leading to larger surrounding natural areas. The analysis should also analyze the habitat linkage opportunities and constraints of the utility corridor and drainage easements that course through and along/adjacent to the subject property boundaries.

Need for Road Stub Growth -Inducing Impact Analysis

To sufficiently address potential growth-inducing and potential cumulative ecological impacts associated with road stubs that extend west from proposed North Hills Parkway, the DEIR must address how extensions of these roads would bisect habitat and lead to additional loss of habitat and wildlife corridors from the development they may facilitate.

These road stubs are clearly project elements that are meant to facilitate development of several parcels located to the west. If the project applicant has a financial interest in any properties that benefit from these, or any other proposed road stubs, the DEIR should disclose that financial relationship and address the potential impacts to the subject properties.

The project description shall remain deficient until it includes the above described road stubs or eliminates them from the site plan and all other aspects of the project. If any of the subject road stubs remain part of the proposed project description, the DEIR must

address how the increased traffic volume and lighting impacts associated with flow through traffic, and that generated from adjacent parcels, would diminish the habitat value of the proposed project's natural open space areas.

Analysis of Extensive Detention Basin Acreage

The proposed project includes a minimum of 25 acres of water detention area, the majority of area being described as "detention basin." The DEIR should describe this disproportionate amount of retention area for a project located along a major developed flood control channel (all along southern boundary). The DEIR must analyze how much offsite generated flow and runoff volume is designed to be retained onsite. If offsite (or future offsite) generated flow is to be retained onsite, the potential growth-inducing and potential cumulative impacts of that relationship to surrounding properties must be addressed in the DEIR.

The full potential of each proposed basin to ever need to be cleaned out (which would result in the near complete loss of riparian and wetland vegetation) must be fully disclosed in the DEIR. The DEIR must also disclose how much riparian habitat mitigation is going to be credited to planting in the basins and if any of that credit would benefit other projects. If any of the credited mitigation habitat has any potential of needing to be periodically removed for maintenance, then that mitigation credit should not be valid.

The DEIR must analyze and describe whether the twenty-plus acres of habitat in the three proposed primary detention basins will have any terrestrial connectivity to any other natural open space areas of any size.

Proposed Habitat Connectivity and Protection DEIR Alternative

To reduce substantially reduce potentially significant biological impacts, the DEIR must include a project alternative that includes 50 acres of protected natural open space north of the proposed section of North Hills Parkway and maintains the bulk of the project objectives. Open space located south of the proposed section of North Hills Parkway would not have a direct or road-free connection to the Santa Susana Mountains ecosystem and thus will be of comparatively lesser ecological value. Units must be removed from Planning Area 1 to create such a project alternative that significantly reduces biological impacts.

Need for Fee Simple Natural Open Space Dedication

There is no guarantee that natural open space lots will retain their habitat resources in perpetuity unless they are dedicated in fee to a conservation or parks agency with funding to monitor and protect the areas. As a result, setting aside open space as a condition of a tract map approval is only a partial mitigation measure and incomplete condition of approval. We urge the City to have the open space dedicated in fee to a park district or agency such as the MRCA as condition precedent to Tract Map recordation. The landscape maintenance or community facilities district(s) or Homeowners Association CC&Rs for the project should then be required to permanently generate enough funding to allow a monthly ranger, park facilities, or ecologist visit. With all costs included that amount should be no less than \$5,000 annually to provide both for contingencies and inflation.

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

Sincerely,

ELIZABETH A. CHEADLE
Chairperson