

**SANTA MONICA MOUNTAINS CONSERVANCY**

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August 25, 2014

Mr. Vernon Umetsu  
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Department of Environmental Services  
2929 Tapo Canyon Road  
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**Royal Oaks Hummingbird Creek Development Project**  
**Case No. PD-S-1030 Comments**

Dear Mr. Umetsu:

The Santa Monica Mountains Conservancy staff offers the following comments on the proposed Royal Oaks Hummingbird Creek Development Project proposing the development of 24 single family residences adjacent to Santa Susana Mountains core habitat. The proposed project does not work with the surrounding environment and biological and visual impacts will undoubtedly be significant and unavoidable.

The proposed project area represents an iconic and visually significant viewshed located along the 118 Freeway, within the City, and within the Santa Susana Mountains. The development project lies adjacent to Rancho Simi Recreation and Park District (RSRPD) and Mountains Recreation and Conservation Authority (MRCA) parkland. That parkland is integral to a major core habitat section of the Santa Susana Mountains. The proposed project would locate single family residences within this public wilderness boundary. Structures would be subject to fire damage if there was not substantial brush clearance on the subject public parkland. The Conservancy objects to any project components that would require clearance on RSRPD parkland. Given the ecological sensitivity of the site, the project should demonstrate that there will be no substantial direct or indirect ecological impacts that cross over into parkland and Hummingbird Creek. An Environmental Impact Report (EIR) 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.

An integrated approach that works with the surrounding environment must be analyzed in a CEQA document. Adjacent parkland to the proposed development project is integral to core habitat of the Santa Susana Mountains. Analysis of project alternatives that demonstrate no substantial direct or indirect ecological impacts should be prepared as part of an EIR.

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The project area falls within the City of Simi Valley General Plan Wildlife Habitat and Movement Corridors (General Plan figure NR-2). Furthermore, the project is adjacent to Hummingbird Creek - an identified wildlife corridor in the Santa Monica-Sierra Madre Connection South Coast Missing Linkages Project. Its protection is vital to inter-mountain species linkage. Therefore the City should implement General Plan Natural Resource policies NR-1.6 (open space for wildlife habitat), NR-2.2 (wildlife crossings), AND NR-2.4 (habitat connectivity) to ensure the project and alternatives preserve this important wildlife corridor.

Riparian habitat in the southern 2-miles of linkage leading to crossing at 118 Freeway is extremely rare. Development of the proposed project would further impact and encroach on the rare riparian resources in Hummingbird Creek. No riparian habitat in the linkage should be subject to light and noise pollution from home sites.

Fuel modification creates numerous undesirable ecological effects to the surrounding environment. The project should not be allowed to clear vegetation in ecologically sensitive public parkland area. Any fuel modification located on RSRPD parkland is not within the public's best interest and undermines public investment in the area. Project alternatives that avoid fuel modification within public parkland must be analyzed in an EIR.

The proposed project would result in the loss of coast live oak woodland habitat found on the edge of Santa Susana Mountains core habitat. The project would expand upon the anthropogenic induced edge effects to this section of the Santa Susana Mountains. Human activity introduces detrimental edge effects to both habitat and species including but not limited to; increase of pollutants, introduction of invasive species, increase risk of fires, companion animals acting as predators and competitors, and loss of foraging habitats. The impacts of converting this habitat to a single family neighborhood should be fully analyzed in an EIR. The project cannot solely rely on oak tree replacement planting as mitigation for the cumulative loss of coast live oak woodland habitat. The proposed homes would be subject to excessive freeway noise. An EIR may require a sound wall which would cause adverse visual impacts. Project alternatives and further mitigation measures should be analyzed in an EIR.

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Should you have any questions or clarification requests, please contact Paul Edelman,  
Deputy Director of Natural Resources and Planning, at 310-589-3200, ext. 128.

Sincerely,

LINDA PARKS  
Chairperson