

**SANTA MONICA MOUNTAINS CONSERVANCY**

RAMIREZ CANYON PARK  
5750 RAMIREZ CANYON ROAD  
MALIBU, CALIFORNIA 90265  
PHONE (310) 589-3200  
FAX (310) 589-3207  
WWW.SMMC.CA.GOV



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Cynthia Sabatini, Associate Planner  
Planning Division - Environmental Services  
City of Simi Valley  
2929 Tapo Canyon Road  
Simi Valley, California 93063

**Pre-Con Products - West Los Angeles Avenue - Arroyo Simi  
Mitigated Negative Declaration Comments  
CUP - S-778**

Dear Ms. Sabatini:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on the proposed outdoor storage yard for recycled concrete and concrete products on a 6.6-acre parcel that abuts the Arroyo Simi. The proposed project would place tens of thousands of cubic yards of fill material into what is now a flood hazard zone of the Arroyo Simi. That fill would cover up a blueline tributary to the Arroyo Simi that is recognized as critical habitat linkage zone in the South Coast Wilds Missing Linkages - Sierra Madre to Santa Monica Mountains Linkage as shown on the attached figure generated by the Conservancy staff.

With the recent regionally significant Alamos Canyon purchase by the Rancho Simi Recreation and Park District, high quality habitat linkage is now permanently protected under the 118 freeway to the railroad tracks - but only to an opening on the south side of the tracks. As stands, there is now an approximately 280-acre contiguous habitat block between railroad tracks and the 118 freeway that connects back to the Santa Susana Mountains via the 135-foot-wide Los Alamos Canyon Road crossing beneath the freeway. For animals to reach the west end of the large habitat block from the freeway undercrossing, they must course through the human-occupied Oak Park campground and day use facility. There are no such impediment to the east of the undercrossing.

Without having to course through Oak Park, wildlife now are down to two sub-optimal crossings of the railroad tracks and Los Angeles Avenue to reach the edge of the Arroyo Simi. The best route is the drainage for Alamos Canyon that is entirely on undeveloped private land between the railroad tracks and Los Angeles Avenue. That route eventually squeezes to less than 75-wide before it reaches the Arroyo Simi and that is prior to the

Cynthia Sabatini  
Pre-Con Products – CUP S-778 MND COMMENTS  
August 28, 2017  
Page 2

approved impacts from a yet-to-be completed construction storage yard that will further reduce the width, add human edge impacts, and a bridge over the channel. In short there is no permanent protection in place and the probability of future diminished ecological value is high because the City does not require adequate wildlife corridor widths and buffers or permanent protection mechanisms.

The second remaining available option for wildlife to move between the Alamos freeway under-crossing and the Arroyo Simi is through the subject Pre-Con Products property via a USGS blueline stream that crosses under both the railroad tracks and Los Angeles Avenue with a minimum six foot diameter culvert that sees daylight between the tracks and the roadway. There is high quality habitat including oak woodland on the north side of tracks.

This culvert system is of high value to bobcats, numerous other smaller mammals, and reptiles to travel from the Santa Susana Mountains into the Simi Hills. The Mitigated Negative Declaration (MND) is deficient for not providing the above habitat connectivity information and setting and not adequately analyzing the value of the subject property to inter-mountain range habitat connectivity. The MND is further deficient for not addressing the potential adverse impacts of the proposed project on this crossing system and the potential cumulative impacts on the loss and threats to habitat connectivity between the Alamos - 118 freeway under-crossing and the edge of the Arroyo Simi.

The MND is further deficient for making the assumption that the above-described Alamos Creek connection from the railroad tracks to the edge of the Arroyo Simi is biologically sufficient to maintain regional habitat connectivity and that such level of connectivity is in anyway assured to remain un-degraded. In regards to the conditions of the Pre-Con site, did the project biologists do animal track studies at south end of the Los Angeles Avenue culvert and if so over what period of time?

The Conservancy is dismayed at how cavalierly the City's MND dismisses the value of the subject blueline stream that currently provides seamless habitat connectivity from the area south of the 118 freeway into the Arroyo Simi. The proposed project could have an unavoidable significant adverse direct and cumulative impact on habitat connectivity between the Santa Susana Mountains and the Simi Hills via the Arroyo Simi.

Cynthia Sabatini  
Pre-Con Products – CUP S-778 MND COMMENTS  
August 28, 2017  
Page 3

Given the above facts about the dire status of habitat connectivity under the railroad tracks and Los Angeles Avenue, the MND cannot conclude that the provision of a “Wildlife Movement Area” strip that parallels Los Angeles Avenue behind a tall guard rail and micro-thin, landscaped “Wildlife Escape Route” along the western property boundary will mitigate the total elimination of an existing habitat linkage system tied to existing culverts. The project does not even require conservation easements over these two proposed wildlife movement areas that appear to be total project after thoughts meant to appease CDFW concerns.

The proposed project requires a focused Environmental Impact Report to address permanent significant adverse impacts to a regional habitat linkage. Those impacts are avoidable if the project does not fill and underground the blueline streambed. The soft bottom streambed must remain intact at its current width and approximate grade to allow animals to move from the existing Los Angeles Avenue culvert to the Arroyo Simi. Bridges over the drainage are acceptable. The project area would be reduced but so too would expensive drainage infrastructure costs, offsite streambed mitigation costs, and future maintenance costs. The project could then recapture the proposed wildlife movement area as usable acreage. The applicant and the City have an amazing one time opportunity to provide a project that enhances inter-mountain range wildlife movement.

The MND is further deficient for not addressing the amount of CDFW or ACOE jurisdictional area proposed to be eliminated by the project for decision-makers to consider. The amount appears to exceed 0.5 acres of drainage area. The reliance on future preparation of a Habitat Mitigation and Monitoring Plan to finalize the submitted Conceptual Restoration Mitigation Plan is deferred mitigation. The MND entirely relies on the Conceptual Restoration Mitigation Plan, and non-existent Habitat Mitigation and Monitoring Plan, to conclude that the proposed project would not result in a substantial adverse effect on wetland and jurisdictional areas. The MND does not include a single cause and effect statement and zero detailed analysis or justification of how these plans would compensate for the elimination of over 0.5 acres of drainage area that comprises part of a regional wildlife corridor.

Cynthia Sabatini  
Pre-Con Products – CUP S-778 MND COMMENTS  
August 28, 2017  
Page 4

This probable 0.5 acres of drainage area elimination does not include the proposed filling in the floodplain of the Arroyo Simi. How much of that Arroyo Simi fill area is jurisdictional? The MND is deficient for not addressing the potential impacts of this issue. The MND is further deficient for not addressing that some of that flood plain filling would result on public land owned by the Rancho Simi Recreation and Park District (District). The project also requires offsite grading to the west. The project description is deficient.

How the MND can conclude that filling a blueline stream and a portion of the Arroyo Simi floodplain including a portion on protected parkland will specifically result in a better riparian habitat is not supported in the document. A quick Google Earth examination of the success of riparian plantings on the armored manufactured fill slopes that the City has permitted in the subject section of the Arroyo Simi north bank reveals that such forced landscaping is not a viable mitigation measure to date. The subject fill slopes are removed from any of the non-flood hydrology that sustains riparian habitat. They require permanent irrigation to provide compensatory equivalent habitat values. Drainage avoidance must be required of this project to avoid this failed mitigation pitfall.

The proposed fill slopes that go into the Arroyo Simi flood plain supposedly provide a viable 20-foot-wide easement trail easement for the District. That easement provision is the MND mitigation measure that makes the project not have significant recreational impacts. However, that trail easement is not feasible because the west end terminates in a 2:1 slope and the east end courses across a 2:1 slope without accommodating the need for a flat graded multi-use trail. The grading plan is deficient to provide a future trail. Also the trail easement courses nearly straight up a slope with a shown 16 percent grade with no grade breaks. Such a trail would neither be safe nor sustainable. The MND provides both an inadequate analysis of onsite topographical details and offsite trail connectivity issues and fails to provide feasible mitigation measures. Even if the District is satisfied, the MND remains deficient. The Conservancy recommends that the City require the applicant to set aside \$100,000 in an escrow account for the District to build such a future trail and tie it into adjoining trail easements over time.

Cynthia Sabatini  
Pre-Con Products – CUP S-778 MND COMMENTS  
August 28, 2017  
Page 5

Please contact Paul Edelman, Deputy Director of Natural Resources and Planning, at 310-589-3200, ext. 128 or at the above letterhead address with any questions and future correspondence.

Sincerely,

IRMA MUÑOZ  
Chairperson