

SANTA MONICA MOUNTAINS CONSERVANCY

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October 25, 2004

Lauren Funaiole
City of Simi Valley
2929 Tapo Canyon Road
Simi Valley, California 93063-2100

**Draft Environmental Impact Report
for the Douglas Ranch Planning Unit 5 Project
PD-S-942/TT5411**

Dear Ms. Funaiole:

The proposed Douglas Ranch Planning Unit 5 development project in the City of Simi Valley is located within the Rim of the Valley Trail Corridor portion of the Santa Monica Mountains Conservancy (Conservancy) jurisdiction. The Conservancy is concerned about potential significant adverse impacts to the visual and biological resources located on the project site, adjacent parklands, and the Santa Susana Mountains ecosystem.

The 5,000-acre Rocky Peak park complex is located just to the east of the project site by approximately two thousand feet. Rancho Simi Recreation and Park District owns the parkland in between.

The Draft Environmental Impact Report (DEIR) includes a Reduced Project Alternative. This alternative is identified as the environmentally superior alternative. However, the only real difference between this alternative and the preferred alternative is 15 fewer units. The footprint is virtually the same for both of these alternatives. The DEIR is deficient for not including a reduced project alternative that is fundamentally different from the preferred alternative and reduces environmental impacts. The DEIR must include alternatives that avoid developing key portions of the property and result in a reduction of visual and ecological impacts. To include a sufficient range of alternatives the DEIR must include the following two additional alternatives: (1) Reduced Viewshed Impact Alternative and (2) Reduced Viewshed and Biological Impact Alternative.

The Reduced Viewshed Impact Alternative would remove the eastern-most quarter of the project site from the development footprint. This alternative would have 27 fewer units than the preferred alternative for a total of 63 units. Please refer to the attached Figure A

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for the project footprint under this alternative. The DEIR is deficient for stating that there would be no impacts by the proposed project on scenic vistas. The proposed project would turn this bucolic, highly-visible section of Simi Valley into a high density development with little attempt to conceal it. Several oak trees would be preserved under the minimum viewshed impact alternative. A portion of the undeveloped area in the eastern part of the project site should be used to help reduce the visual impacts of the project. A berm could be created in the eastern portion of the project site to minimize the visual impacts of the project. The area could also be planted with native plants to help conceal the project.

The Reduced Viewshed and Biological Impact Alternative would remove the western-most quarter and eastern-most quarter of the project site from the development footprint. This would be the environmentally superior alternative. Please refer to the attached Figure B for the project footprint under this alternative. Forty-two units would be developed under this alternative. Several oak trees would be preserved. Only nine units would be directly adjacent to the freeway. The rest could be partially shielded by existing topography, plantings, and berms. This alternative would protect the toe of the hill on the western portion of the project site. This alternative reduces the impacts on the adjacent and nearby parkland. It would also preserve two sizeable blocks of open space on the project site.

Either of these two alternatives would substantially lessen visual impacts that degrade one of the City's most important viewshed corridors.

The DEIR states that restoration of habitat on Rancho Simi Recreation and Park District (RSRPD) land will be done as mitigation for biological impacts. To be a valid mitigation measure considered by decision makers, the FEIR must include a letter from the RSRPD stating explicitly what type of mitigation the District has allowed and in exactly what location.

All open space must be protected, at a minimum, by a highly restrictive conservation easement granted to a park agency.

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The Conservancy appreciates the opportunity to comment. Please direct any questions or future documents to Susan Poynter of our staff at (310) 589-3200 ext. 124 and at the above Ramirez Canyon Park address.

Sincerely,

JEROME C. DANIEL
Chairperson