



Ventura County Coalition of Labor, Agriculture and Business

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National Park Service
Rim of the Valley Corridor Study
570 W. Avenue 26, #175
Los Angeles, CA 90065
Transmitted via email to: pwr_rimofthevalley@nps.gov

RE: Comments to Rim of the Valley Special Resource Study on the Santa Monica Mountains
Recreational Area (SMMNRA)

Ventura County CoLAB is a non-profit advocacy organization representing over 400 individuals and businesses, primarily farmers, ranchers and property owners in the County unincorporated areas. Agricultural businesses here are generally small and privately owned. Land for farming is high quality with abundant prime agricultural soils and a Mediterranean climate. Ventura County has some of the most expensive farmland in the world. Farm operations are costly and the threats to agriculture are ever increasing. Costs have been escalating for water, pest control, labor, energy and regulatory compliance. Our goal is to keep farming and ranching economically viable here which may become impossible with the introduction of public trails and recreation areas into farming and grazing areas.

CoLAB recommends Alternative A for the following reasons:

1) A majority of the lands identified in alternatives B, C and D in Ventura County are not in any danger of urban development:

We take exception to the claim that these lands identified by the Park Service, within Ventura County, are in need of being preserved. There are roughly 200,000 acres of grazing land in the County that is being carefully stewarded by private property owners. In addition there are 100,000 acres of irrigated farmland. There is no threat of urban development on these lands which are protected by layers of regulations and ordinances that are continually strengthened by government agencies.

2) More than 50% of all land in Ventura County is already owned by the government and conservancies:

A review of federal and state lands in Ventura County shows that over half of the 1.2 million acres is already owned by the government and conservancies. The majority of these existing public lands are within the Los Padres National Forest and the Santa Monica Mountains NRA.

3) Governmental agencies have significant difficulties in funding the administration and maintenance of these public lands in Ventura County, particularly once public trails are established:

The U.S. Forest Service struggles to fund trail maintenance on the forest land in Ventura County. Many of the public trails in our County are plagued with trash and graffiti and are not adequately patrolled. Targeting tens of thousands of acres of additional Ventura County land for the National Park system is unwarranted, particularly when there is no real threat of development.

4) Local public agencies will use Cooperative Conservation Area boundaries and National Recreation Area boundaries to justify additional regulations on private landowners that will reduce their ability to produce food, fiber and energy resources on their land:

Once lands are labelled with such terms as “Cooperative Conservation Areas” and “National Recreation Areas” these lands will be more regulated by local public agencies, hindering them from being productive lands. Los Angeles County has already limited agricultural development in the existing SMMRA and Ventura County is looking at following suit. This will jeopardize the nation’s food and energy security as significant conflicts arise between environmental activists / public trail users and those who produce our food, fiber and energy.

In fact, at a local Planning Commission hearing just last week, hikers on the Santa Paula Canyon - Last Chance Trail, voiced complaints about having to view oil pumpjacks from the trail which is provided by an easement granted by the property owner. Environmental activists were appealing the oil operator’s right to drill wells on their lease which is on private land. These kinds of conflicts are all too common.

At this hearing, hikers criticized the oil company operator for not removing graffiti from the pumpjacks quickly enough. Fortunately one of the Planning Commissioners had been on the trail and brought up the fact that natural rocks up the trail were also constantly tagged and that graffiti was not removed by the Forest Service.

CoLAB does not believe there is sufficient evidence for government agencies to increase the pressure on private property owners to formally “preserve” land that they are already stewarding, particularly when there is no real danger of urban development. The increased cost for Alternatives B, C and D are not warranted and we believe there are many more pressing issues to our nation considering our national debt.

The Rim of the Valley Corridor study states with respect to Alternative A (No Action Alternative):

Resource Protection

Protection of natural and cultural resources under the management of existing agencies would continue. Government grant programs, California state land conservancies, local governments, and non-profit land conservancies/trusts throughout the study area would continue to conserve and restore native ecosystems and habitat. Coordination among agencies to protect wildlife habitat and corridors and cultural resources would continue to occur on a case-by-case basis in various locations throughout the study area.

Ventura County CoLAB recommends the National Park Service adopt Alternative A (No Action Alternative) such that operations and maintenance of existing parks and open space would remain at existing levels. There are ample opportunities for new public trails and recreation on public lands in the existing SMMRA and Los Padres National Forest designated areas.

Thank you for this opportunity to comment.

Sincerely,



Lynn Gray Jensen
Executive Director