



April 24, 2017

Ventura County Planning Division
800 South Victoria Ave
Ventura, CA 93009

Re: Comments on Chapter 8 - General Plan Background Report: Natural Resources

SECTION 8.2 BIOLOGICAL RESOURCES

Subsections: Major Findings, Special Status Species and Habitat Connectivity/Wildlife Corridors, Open Space Lands

Issue 1: Ventura County Locally Important Species

CoLAB is concerned about the County's ability to properly maintain the Locally Important Species List and to make sure that the species on the list continue to meet the criteria. Many of the species on the Locally Important Plant List are common species in adjacent counties but Ventura County guidelines treat them like they are rare. We have documented 51 plant species that do not qualify for the current list.

Recommendation: We recommend that the County assess this program and determine whether it has added any value to the biological assessments and whether it is worth funding the effort to continue this list in the updated General Plan.

Keeping such a list could invite litigation, particularly if it is not carefully managed. Many of the current species on the lists are already special status species thereby required to be part of a biological assessment without the separate local listing.

According to the General Plan, Locally Important Species are not rare, threatened or endangered and are referred to as a "quality example" or "unique species". One of the criteria for plant species is that they have 5 or less element occurrences documented in the County. Since biologists continuously collect species samples and send them to the Herbaria, new findings can disqualify a species from the list.

It is unusual for Counties to keep such a list particularly since the State of California has an extensive list of sensitive species of plants and animals. To have and maintain such a local list comes with a responsibility, as referenced in the Ventura County Initial Study Assessment Guidelines, with a requirement that the list be maintained by the Ventura County Planning Division and updated annually each January.

The process for updating the Locally Important Species list is identified by the County in a procedural document (<http://vcrma.org/planning/pdf/conservation/Procedure-for-Updating-Locally-Important-Species-List.pdf>). However, the current list is dated 2014 and the current website language directs additions or removals from the list to be submitted by filling out a Ventura County Locally Important Species Data Form and by submitting that form to the Planning Division by July 31, 2015. There has not been an updated list for 2015 or 2016.

This is problematic as VC CoLAB was concerned that a number of plant species on the County Locally Important Species List did not meet the Planning Division criteria.

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On July 23, 2015, prior to the deadline, our contract biologist, Dr. R John Little, Ph.D. submitted 51 data sheets with back-up data showing species that did not qualify for the list.

Subsequently, we received confirmation from the Planning Biologist, Mark Ogonowski on July 23, 2015 that the data was received and would be evaluated by “our committee of expert regional biologists”. Since then there has been no further communications on this matter from the County.

We believe that the Ventura County Locally Important Species program needs to be analyzed and re-considered by County Planning prior to including these lists in the General Plan Update.

Issue 2: Special-Status-Species (Tables 8-6 and 8-7)

Recommendations:

- 1) CoLAB recommends removing Tables 8-6 and 8-7 from the General Plan. These lists are updated regularly causing the need for general plan updates or having species lists in the General Plan that are incorrect and out of date.
- 2) The language and tables in this subsection reference the southern steelhead as a special status species. The United Water Conservation District published two reports in 2008 on the History of Steelhead and Rainbow Trout in Ventura County: [Volume I](#) and [Volume II](#). These reports document the stocking of steelhead into the Ventura and Santa Clara Rivers from 1887 to 1939 with the peak in 1915. This is an important local phenomenon that most of the general public is not aware of. We recommend the summary of steelhead stocking be included and the volumes referenced in the updated General Plan as background information.

Issue 3: Habitat Connectivity / Wildlife Corridors

This subsection is based entirely on the South Coast Missing Linkages Project (SCMLP) Reports as referenced in the General Plan. We disagree with the characterization of this report and the lack of balance in the analysis and the number of statements that are unsubstantiated in the reports.

COLAB believes that wildlife linkages are an important local issue and that the preservation of existing linkages need to be considered in a set of workshops that include local biologists, local conservation organizations, local public agencies, and affected landowners. The linkages cover 419,000 acres of the County, nearly 35% of the total County acreage.

Recommendations:

- 1) Participants in the general plan update process should carefully read the SCMLP reports and gain an understanding of the scope of what is being proposed and the potential impact on not only county residents and businesses but also County Public Works projects in the linkage areas.
- 2) The County of Ventura should notify all property owners that are within the boundary of the current linkage design that their parcels are being considered for a regulatory action. If this were happening to your property you would want to be informed!
- 3) The County should preserve existing linkages through a collaborative process involving the landowner community, local biologists, conservation organizations and local public agencies to analyze the details of the mapped areas identified by the SCMLP report and reach a consensus of what is best in our county. In these forums there can be discussions of how to preserve large tracts of land in the linkages through clustering, trading of development rights, incentivizing conservation easements and other methods that are working in other counties across the country.

- 4) Revise the description of the collaborative groups in both the Major Findings and Habitat Connectivity / Wildlife Corridors sections as they are misleading, using the terms “land manager” and “community organizations” to sound like there was community outreach. In reading the list of workshop speakers, participants and steering committee, there are no community organizations or private landowners that were invited to the workshop. Land managers were Forest Service and Park Service staff and community groups were environmental organizations. This would lead readers to think there was public outreach.
- 5) The Habitat Connectivity / Wildlife Corridors section needs to recognize the shortcomings of the SCMLP. It is a regional study with the final report drafted by a non-profit organization. The staff was mostly from out of Ventura County and there was no access to the thousands of acres of local private lands that could be impacted by new regulations. The study had no accountability as there was no public input and in contacting the South Coast Wildlands Organization, CoLAB was told that the data and assumptions to create the mapped boundaries were only accessible to public agencies.

Our initial analysis focused on the Santa Monica-Sierra Madre linkage that trends generally north-south across East County. This one linkage includes 126,000 acres of land, of which 82,000 acres are private lands. No public outreach was made by SCML to the landowner community or County Public Works staff.

We encourage all participants in the General Plan process to read the full study, found at:

http://www.scwildlands.org/reports/SCML_SantaMonica_SierraMadre.pdf

SCMLP Santa Monica - Sierra Madre Report: Within the linkages, the SCMLP report defines features that impede species movement and propose mitigation that is unrealistic in scope and affordability as follows:

Removing and Mitigating Barriers to Movement (Page 75)

“Five types of features impede species movement through the linkage: roads, railroads, and impediments to stream flow, urban and agricultural development, and recreational activities. This section describes these impediments and suggests where and how their effects may be minimized to improve linkage function”.

Roads (Page 76): For roads they recommend crossing structures at .9 to 1.3 mile intervals across 211 miles of paved roads that cross the outlined corridors in the report. That would be roughly 211 crossings that go over or under the U.S. 101, Highway 5, and State Routes 126, 23, 118 and 14 plus the other paved roads. And the overpasses must be vegetated. And then there must be fencing to funnel the wildlife to the crossings and keep them from being trapped in the road corridor. Then there are smaller retaining walls needed for amphibians and reptiles and directions for reducing lighting and noise.

Railroads (Page 95): Two rail lines cross the linkage. Mitigation would include more crossings, sound walls to reduce noise, and guiding fences.

Impediments to streams (Page 97): “For plants and animals associated with streams or riparian areas, impediments are presented by water diversions and extractions, road crossings, exotic species, water recharge basins, farming in streambeds, gravel mining, and concrete structures that stabilize stream banks and streambeds.” The study calls out the Vern Freeman dam, the Harvey Dam on Santa Paula Creek and the Santa Felicia Dam on Piru Creek. Agriculture is also called out as an impediment to streams, causing a loss of surface and groundwater and lowering water quality.

Urban development (Page 102): The SCML report targets urban and suburban development including night lighting, noise, pets, landscape irrigation, human traffic, and road traffic. Mitigation efforts include evaluation of existing stream crossings, restoring riparian vegetation within .6 miles of streams, discouraging channelization of streams, preventing off road vehicles, and restricting farming, gravel mining, dredging and building in streams and floodplains.

Recreation (Page 104): “Even such relatively low-impact activities as wildlife viewing, hiking, and horseback riding have been shown to displace wildlife from nutritionally important feeding areas and prime nesting sites.”

The problem with this report is that it identifies impediments to wildlife movement that are fundamental to our human way of life. Roads and railways are essential to human travel. Building the amount of crossings with fences and walls recommended in the project report is hardly feasible. Our local network of roads and highways are crowded with many needing additional lanes to accommodate the traffic flow. Water extraction, diversion, storage and recharge are fundamental to maintaining our drinking water and agriculture is fundamental to our need for food. Flood control improvements keep our houses and agricultural lands from being damaged by floods. And, much of the lands within the linkage that are protected in conservation easements have requirements for human recreation on trails and bicycle pathways.

Unfortunately, this project as mapped has no basis in reality. It includes many businesses, suburban developments, ranches, schools, the Reagan Library, Thomas Aquinas College and more. In the prime agricultural areas in the Santa Clara Valley surrounding Fillmore and Piru, the mapped corridors are 3 to 5 miles wide. Between Simi and Moorpark, they are over 3 miles wide. Landowners within the arbitrary boundary have not been notified by the County that this project exists. Additional County regulation placed on residents living and working within the boundaries of this one linkage will be a huge impact to livelihoods for little gain.

CoLAB understands the value of wildlife linkages in our County. However, we believe that the preservation of existing linkages will require a collaborative process with local participation. Many private property owners have provided stewardship of their land for generations. The wildlife linkage project involves hundreds of thousands of acres of private property with extremely diverse uses and finding common ground will be key to the success of any attempt to preserve the existing wildlife habitat and linkages in Ventura County.

SECTION 8.3 OPEN SPACE FOR OUTDOOR RECREATION

Table 8-9 and Figure 8-7

Issue #1: Recreation and Open Space Areas

Protected Open Space areas are in a table and mapped format in this section of the Background Report. As the Nature Conservancy is not an agency, other non-profit land conservation trusts should be included in this table and map. We recommend that the new Rancho Ventura Conservation Trust on the Ventura Hillside be included in the table and map. Please contact Richard and Bonnie Atmore for more information.

Thank you for the opportunity to submit comments and engage in the General Plan process.

Sincerely,



Lynn Gray Jensen
Executive Director