

**SANTA MONICA MOUNTAINS CONSERVANCY**

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Board of Supervisors  
County of Ventura Government Center  
800 South Victoria Avenue  
Ventura, California 93009

**County CEQA Initial Study Assessment Guidelines  
Biological Resources**

Honorable Supervisors:

The Santa Monica Mountains Conservancy (Conservancy) strongly supports the County's proposed Initial Study Assessment Guidelines for Biological Resources and urges you to adopt them without further revision. The guidelines accurately reflect the state of the science in conservation biology, including recent research on concepts such as connectivity, edge effects, and wildlife corridors. As revealed at an outreach meeting, there is near consensus among biological consultants that work in the County that these guidelines will improve consistency among practitioners and codify methodology that is already commonplace. This will in turn create a more predictable review process for property owners, resulting in lower costs from fewer disputes, while better protecting biological resources.

Various concerns have been raised by the public, ranging from specific language to general opposition to environmental regulation. In all cases, County staff has been tireless in meeting with the public, educating landowners, and addressing specific issues. The result of this outreach has been a stronger document and greater public understanding of the California Environmental Quality Act (CEQA) process. The draft guidelines have been revised to accommodate concerns as they are raised. Remaining opposition reflects resistance to environmental regulation in general and cannot be realistically mollified by changes to these guidelines.

Landowners deserve a consistent, predictable environmental review process. These guidelines will set much-needed standards for thoroughness to independently evaluate the quality of biological resource studies. For landowners, this means that when they commission a biological survey, they can expect that the result will hold up to scrutiny. No one benefits from the delay and expense caused by uncertainties in the scope and depth

necessary for a satisfactory survey. Along these lines, landowners, biologists, and County staff were all in agreement that staff needs more resources to maintain an accurate and up-to-date database of known occurrences of sensitive species. The Conservancy encourages you to allocate sufficient staff time and resources to maintain a high quality biological database.

Ventura County is fortunate to have diverse ecosystems across the County's multiple transverse mountain ranges and alluvial river valleys. This unique natural heritage must be adequately protected as land is put to economic use. These guidelines provide a basis for field biologists to assess the significance of local potential impacts in the context of the County's broader biological resources. Although updated from previous versions, the proposed guidelines are based on current standard practice. Any deviation from these would effectively loosen standards that have been in place for the past two decades. The proposed guidelines will bring the County into compliance with CEQA, ensure fair and consistent environmental review, and protect landowners from challenges based on inadequate biological surveys. The Conservancy urges you to adopt these guidelines without further delay.

If you have any questions, please contact Paul Edelman of our staff at (310) 589-3200 ext. 128.

Sincerely,

ANTONIO GONZALEZ  
Chairperson