

**SANTA MONICA MOUNTAINS CONSERVANCY**

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January 28, 2019

Shelley Sussman, Project Manager  
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**Amendments to the General Plan and Non-Coastal Zoning Ordinance to Establish a  
Habitat Connectivity and Wildlife Corridors Overlay Zone, a Critical Wildlife Passage  
Areas Overlay Zone, and Related Regulations (PL16-0127)**

Dear Ms. Sussman:

The Santa Monica Mountains Conservancy (Conservancy) robustly supports the County's proposed Habitat Connectivity and Wildlife Corridors Overlay Zone, a Critical Wildlife Passage Areas Overlay Zone, and accompanying Ordinance and regulations designed to secure habitat connectivity and wildlife survival in several regionally significant linkage areas. County staff has gone to unparalleled lengths to work with stakeholders to develop balanced regulations for fencing, exterior lighting, vegetation removal, setbacks from surface water features and wildlife crossing structures, and compact development standards. Even the short-term function of the identified regional habitat linkages is at risk without the proposed actions.

The proposed Overlay Zones, accompanying Ordinance and regulations help implement the *State Wildlife Action Plan* (SWAP, 2015 update). Both the SWAP and the proposed Overlay Zones are grounded in maps produced by the South Coast Missing Linkages Project—a collaborative, inter-agency effort to identify and conserve the highest-priority linkages in the South Coast Ecoregion based on the best available science. The implementation flexibility in the proposed actions can fairly address any mapping issues.

The proposed actions also help implement the primary goal of the federal *Southern California Steelhead Recovery Plan* (2012) "... to prevent the extinction of anadromous steelhead by ensuring the long-term persistence of viable, self-sustaining, wild populations of steelhead ..." within the Monte Arido Biogeographic Population Group comprised of the Santa Maria, Santa Ynez, Ventura and Santa Clara River watersheds.

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Amendments to the General Plan and NCOZ to Establish HCWC/CWPA Overlay Zones  
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The proposed actions are consistent with *California Water Action Plan* (2016 update) by highlighting *surface water features* for additional protection. Impacts from development including, but not limited to, declining surface flowage, depleted groundwater, and impaired water quality, will become more prevalent with climate change. Efforts to protect *surface water features* are necessary to preserve sensitive wildlife and habitat as well as maintain a safe environment for Ventura County residents including disadvantaged communities that are more susceptible to adverse impacts of climate change.

Within the definition for *surface water feature* (Article 2, Section 8102-0), the Ordinance states: “The term *surface water feature* does not include ponds, lakes, marshes, wetlands, or *agricultural water impoundments* or associated *riparian habitat areas* that are human-made.” Whether human-made or natural is not the operative factor for functional connectivity or wildlife usage. The ecological value of the overall proposal could be greatly increased if the definition of surface water features was amended to include most human-made *surface water features*. Often the line between human-made and natural is not easy to distinguish.

The proposed actions will bring the County into a leadership position on protecting habitat connectivity, and such actions will also help with climate change adaptation and resiliency.

Thank you for your consideration. Should you have any questions, please contact Paul Edelman, Deputy Director Natural Resources and Planning, at (310) 589-3200 ext. 128, [edelman@smmc.ca.gov](mailto:edelman@smmc.ca.gov), or at the above letterhead address.

Sincerely,

CRAIG SAP  
Chairperson