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March 11, 2019

VIA ELECTRONIC MAIL

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**Re: Habitat Connectivity and Wildlife Corridor Ordinance:
Additional Information Regarding Evidentiary Support**

Honorable Members of the Board:

This office is counsel to the Ventura County Coalition of Labor, Agriculture, and Business ("CoLAB"), a non-profit membership organization formed in 2010 to support land-based and industrial businesses including farming, ranching, oil, mining, and service, and to promote sensible and rational local government. CoLAB identifies and researches issues that impact businesses, and works with regulatory agencies, organizes stakeholders and proposes solutions to problems that impact Ventura County ("County"). CoLAB advocates for businesses through local regulation, providing expertise, research and educational campaigns to inform the public.

Although the County has provided the public with a wholly inadequate time to review the very recent and significant changes to the Ordinance, CoLAB applauds many of the changes a cursory review has allowed us to identify. However, several foundational problems remain, as detailed in

our prior correspondence: particularly, the lack of evidence to support the Ordinance, and the predetermined nature and *post-hoc* rationalization of the regulatory choices made therein. Attached hereto, in multiple parts, are additional emails and presentation materials provided by County staff and consultants that further evidence the backwards nature of the Ordinance's creation.

Also, CoLAB renews its request that the March 12, 2019 hearing on this matter be postponed at least one month, to allow time for the County to provide—and CoLAB to examine—additional responsive documents that were the subject of its September 13, 2018 Public Records Act request, and for CoLAB and others to submit additional comments accordingly.

Very truly yours,



BENJAMIN M. REZNIK
SEENA M. SAMIMI of
Jeffer Mangels Butler & Mitchell LLP

cc: Kim Prillhart (via e-mail; kim.prillhart@ventura.org)

Exhibits: Relevant documents obtained to date via CoLAB's Public Records Act requests
(provided via email through a download link)