



The Boeing Company  
Santa Susana Field Laboratory  
5800 Woolsey Canyon Road  
Canoga Park, CA 91304-1148

VIA FIRST CLASS MAIL, POSTAGE PREPAID  
AND EMAIL ([shelley.sussman@ventura.org](mailto:shelley.sussman@ventura.org))  
In reply, refer to SHEA-115974

January 21, 2019

Shelley Sussman  
Principal Planner  
County of Ventura, Planning Division, #1740  
800 S. Victoria Ave.  
Ventura, CA 93009

Re: *The Boeing Company's Public Comments regarding County-Initiated Amendments to the Ventura County General Plan and Articles 2, 3, 4, 5, 9 and 18 of the Ventura County Non-Coastal Zoning Ordinance, including Zoning Map Revisions to Establish a Habitat Connectivity and Wildlife Corridors Overlay Zone and Critical Wildlife Passage Areas Overlay Zone (PL16-0127)*

Dear Ms. Sussman:

Thank you for the opportunity to comment on Ventura County's Draft Habitat Connectivity, Wildlife Corridors, and Critical Wildlife Passage Areas Overlay Zone amendments to the County General Plan and Non-Coastal Zoning Ordinance ("HCWC/CWPA Amendments"). The Boeing Company (Boeing) is the majority landowner of the Santa Susana Field Laboratory (Santa Susana), a 2,850-acre historic former rocket engine testing site in the Simi Hills that served as the proving ground for rocket engines that launched America into space and helped win the Cold War. The site is also home to native plants and grasses, riparian oak woodlands and abundant wildlife including deer, bobcats, coyotes and mountain lions.

While Boeing supports the County's effort to preserve and protect areas of land that contain important habitat and serve as habitat linkages areas for regional wildlife, we request that the Planning Commission direct Staff to fix four (4) errors or deficiencies in the draft HCWC/CWPA Amendments to the Non-Coastal Zoning Ordinance (Ordinance) and the Ventura County General Plan (General Plan) text and maps identifying the designated Habitat Connectivity, Wildlife Corridors and Critical Wildlife Passage Areas:

- All of the property at Santa Susana is zoned as "open space", specifically OS-160ac. Also, Boeing's property at Santa Susana is comprised of one legal lot;
- Boeing's property at Santa Susana (approx. 2,400 acres) is forever protected from development pursuant to a conservation easement recorded in 2017;
- All of Boeing's property at the Santa Susana site should be designated as part of the habitat connectivity linkage/wildlife corridor/critical wildlife passage area, as ample data exists that supports the entire Santa Susana being designated as part of the proposed habitat connectivity/wildlife corridor/critical wildlife passage area linking the Santa Monica Mountains to the Sierra Madre Ranges of Las Padres National Forest; and
- The HCWC/CWPA Amendments should include language that exempts fencing, lighting, work in riparian areas, etc. that is necessary for compliance with activities required by or necessary for compliance with laws, regulations, permits or orders issued by federal, state or county agencies. For example, Boeing has obligations under permits applicable to the site that involve work in

County of Ventura  
Planning Commission Hearing  
PL16-0127  
**Exhibit A – Boeing Comment Letter**  
**dated January 21, 2019**

riparian habitats, and Boeing, The Department of Energy (DOE), and the National Aeronautics and Space Administration (NASA) will be conducting environmental remediation at the Santa Susana property and will need to install solid/wildlife impermeable fencing and use bright outdoor lighting during the remediation work for safety, protection of cultural resources, and other purposes.

We have provided additional detail on each of these points below, as well as attached numerous photographs taken onsite within the past 3 years that show the types of plants and wildlife who live, forage, propagate and move at and through Boeing's Santa Susana property.

**(1) All of Boeing's Property at Santa Susana is zoned as "open space", specifically OS-160ac. Also, Boeing's property Santa Susana is comprised of one legal lot**

The Wildlife Corridor and Habitat Connectivity Index Map and Subareas (Exhibit 4, Subarea F of the Planning Commission Staff Report) incorrectly shows that the approximately 2,400 acres that Boeing owns at the Santa Susana site is composed of multiple lots. Boeing's property at Santa Susana has been merged into one legal lot. It is also worth noting that all non-conforming zoning designations on Santa Susana were corrected by Ventura County Planning and approved by the Planning Commission and Board of Supervisors over a year ago. All of the Santa Susana property is currently zoned "open space" (OS-160 ac), which is consistent with the County's General Plan and the HCWC/CWPA Amendments to protect this region from development and preserve the space as a habitat linkage areas for wildlife. As such, Boeing requests that Exhibit 4, Subarea F and Exhibit 6 (Simi Hills Critical Wildlife Passage Area Map) in the HCWC/CWPA Amendments Staff Report and Figures 1.5.5 (Habitat Connectivity and Wildlife Corridors) and 1.5.7 (Simi Hills Critical Wildlife Passage Area) of the Ventura County General Plan Resources Appendix and any other relevant sections of the draft HCWC/CWPA Amendments to the Ordinance and the General Plan be corrected to accurately show the existing legal zoning and number of legal lots within Santa Susana.

**(2) Boeing's property at Santa Susana (approx. 2,400 acres) is forever protected from development pursuant to a conservation easement recorded in 2017**

In 2017, Boeing fulfilled a long-standing commitment to preserve our land at Santa Susana as open space by entering into a conservation easement in favor of North American Land Trust. The easement ensures that the almost 2,400 acres that Boeing owns is forever preserved as open space habitat for the benefit of local wildlife and neighboring communities. The Boeing Santa Susana property will never be used for residential or agricultural purposes so wildlife can continue to thrive. In addition, Santa Susana is located between two other protected open space areas: Sage Ranch and Ahmanson Ranch. As such, Boeing requests that Exhibit 6 Simi Hills Critical Wildlife Passage Area Map Subarea F regarding the Simi Hills area be corrected to reflect the conservation easement on Boeing Santa Susana property instead of the vague and ambiguous "protected lands" description on the Exhibit 6 map and any other relevant sections of the draft HCWC/CWPA Amendments and draft amendments to the General Plan be corrected to accurately show the Boeing's approximately 2,400 acres are legally restricted through a recorded conservation easement in the Ventura County Register of Deeds.

**(3) All of Boeing's Property at the Santa Susana site should be designated as part of the habitat linkage/wildlife passage area**

According to the 2006 South Coast Wildlands Report, all of Boeing's property at Santa Susana sits within a vital habitat linkage that connects the inland Los Padres National Forest (Sierra Madre Ranges) to the Santa Monica Mountains and the Pacific Ocean. As such, we are pleased to see that the western portion of Santa Susana is identified in Ventura County's Draft HCWC/CWPA Amendments as a Habitat Connectivity and Wildlife Corridor area. However, Draft Exhibit 4, Subarea F reflects that less than 50% of the Santa Susana site is proposed to be part of the Habitat Connectivity and Wildlife Corridor, and would

exclude undeveloped areas of the site (Southern and Northern Buffer Zones, as well as areas of designated critical habitat for the federally protected Brauton's milkvetch.

The Draft HCWC/CWPA Amendments defines a Critical Wildlife Passage Area Overlay Zone as "areas particularly critical for facilitating wildlife movement due to any of the following: 1) the existence of intact native habitat or other habitat with important beneficial values for wildlife; 2) proximity to water bodies or ridgelines; 3) proximity of critical roadway crossings; 4) likelihood of encroachment by future development which could easily disturb wildlife movement and plant dispersal; or 5) presence of non-urbanized or undeveloped lands within a geographic location that connects core habitats at a regional scale."

(Proposed Amendment Section 8104-7.8) As numerous local community members stated during the public comment meetings in 2017, given the site's size, location, and inclusion of federal, state and local protected habitats, we believe all of Boeing's property at the Santa Susana site should be identified in *both* the Habitat Connectivity and Wildlife Corridor (Exhibit 4 Subarea F) and Simi Hills Critical Wildlife Passage Area (Exhibit 6) in the HCWC/CWPA Amendments Staff Report. All of Boeing's property at the Santa Susana site should also be identified in proposed General Plan Resources Appendix Figures 1.5.5 and 1.5.7.

Santa Susana possesses wildlife and habitat values of great importance, including: Brauton's milkvetch (*Astragalus brautonii*; federal endangered), Santa Susana tarplant (*Deinandra minthornii*; rare in California); San Bernardino ring-neck snake (*Diadophis punctatus ssp. Modestus*; U.S. Forest Service sensitive species), golden eagle (*Aquila chrysaetos*; California fully protected species and federally protected under the Bald Eagle and Golden Eagle Protection Act), and San Diego desert woodrat (*Neotoma lepida ssp. Intermedia*; Californian species of special concern); 18 native plant communities and at least 214 native species of plants, including without limitation, the Holly-leaf Cherry Chaparral (rare in California) and the California Walnut Woodland (imperiled in California); 125 species of birds, which have been documented on or around the site; numerous aquatic insects, crustaceans, amphibians and terrestrial wildlife supported by winter and spring pools at the Property; and numerous plants, bats, snakes, birds and other wildlife supported by rock outcrops and caves at the site. In addition, the conservation and ongoing active and passive restoration at the site will limit and reduce habitat fragmentation, further enabling habitation by mammalian predator species (including the cougar, *Puma concolor*) that prefer larger unbroken tracts to support large home ranges.

Recently, as part of their mountain lion study, the National Park Service captured and collared three mountain lions at Santa Susana – P-62, P-63 and P-64. And just seven months ago, the first ever mountain lion den identified in the Simi Hills was located at Santa Susana, yielding four kittens – P-66, P-67, P-68 and P-69. (Their mom is P-62.) This provides confirmation that wildlife not only use the site as a linkage, but they live at the site as well.

The long-term survival of a mountain lion population depends upon their ability to move between regions to maintain genetic diversity, reduce mortality and increase overall population health. To address this issue, Boeing supports the public and private entities who have proposed building a wildlife crossing across U.S. Route 101 (US-101) just west of Liberty Canyon Road to help maintain wildlife populations that travel between the Santa Monica Mountains and Simi Hills, and ultimately to the Sierra Madre Mountain Range. We donated \$100,000 to the National Wildlife Federation to complete environmental studies and designs for the wildlife crossing. Boeing also recently donated \$75,000 to support the National Park Service's ongoing mountain lion research project in California.

As such, Boeing requests that Figures 1.5.5 and 1.5.7 and any other relevant sections of the Draft Ordinance or Draft Amendment to the General Plan be revised to include all of Boeing's approximately 2,400 acres of the Santa Susana site as both a "regional habitat linkage" and "critical wildlife passages area."

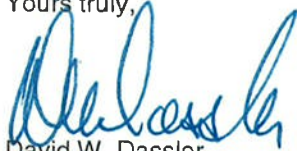


- (4) The Ordinance should include language that does not prohibit work in riparian areas, fencing, lighting, etc. that is necessary for completion of activities required by or necessary for compliance with federal, state or county agency requirements, laws and/or permits

While Boeing appreciates the exemptions from certain prohibitions included in the draft HCWC/CWPA Amendments and General Plan amendments, these exemptions should be revised to very clearly allow any work that is required by or necessary for compliance with federal, state or county agency requirements, laws, regulations, permits or orders. The clarity in these exemptions is critical to ensure that remediation and compliance at the Santa Susana site is not delayed, frustrated or otherwise impacted by the proposed revisions to the Ordinance and General Plan. For example, Boeing has several permits that apply to the site, including a Stormwater NPDES Permit that is under the oversight of the Los Angeles Regional Water Quality Control Board. Boeing also has a Streambed Alteration Agreement with the California Department of Fish & Wildlife. Both of these permits allow Boeing to perform work in the proposed 200 foot buffer in the draft HCWC/CWPA Amendments and General Plan. In addition, Boeing, DOE and NASA will be conducting environmental remediation, including soil excavation, at the Santa Susana property under several Orders with the California Department of Toxic Control Substances. This work will involve coordination with and permission granted from numerous agencies and entities, including by example, the California Division of Occupational Safety and Health, the California Department of Public Health, Federal and State-Recognized Tribes and the California State Historic Preservation Officer. Boeing, DOE and NASA will need to install solid/wildlife impermeable fencing and use bright outdoor lighting during the remediation work for safety, protection of cultural resources, and other purposes. Such activities are expected to be of limited extent and short duration. Boeing requests that Sections 8109-4.8.2.2, 8109-4.8.3.2, 8109-4.8.3.7, and 8109-4.9.2 of the draft HCWC/CWPA Amendments which address regulatory exemptions be revised to expressly exclude any activities that are required by or necessary for compliance with federal, state or County agency requirements, laws, permits or orders.

As noted above, we request that the Simi Hills Critical Wildlife Passage Area be revised to include all of Santa Susana given that the land already serves as an important critical wildlife linkage and passage area (i.e., functional connectivity) and will continue to do so as a result of the conservation easement recorded on Boeing's land. The 2,850 acre property satisfies most, if not all, of the factors that define both Habitat Connectivity/Wildlife Corridor and Critical Wildlife Passage Areas in the Draft HCWC/CWPA Amendments Ordinance.

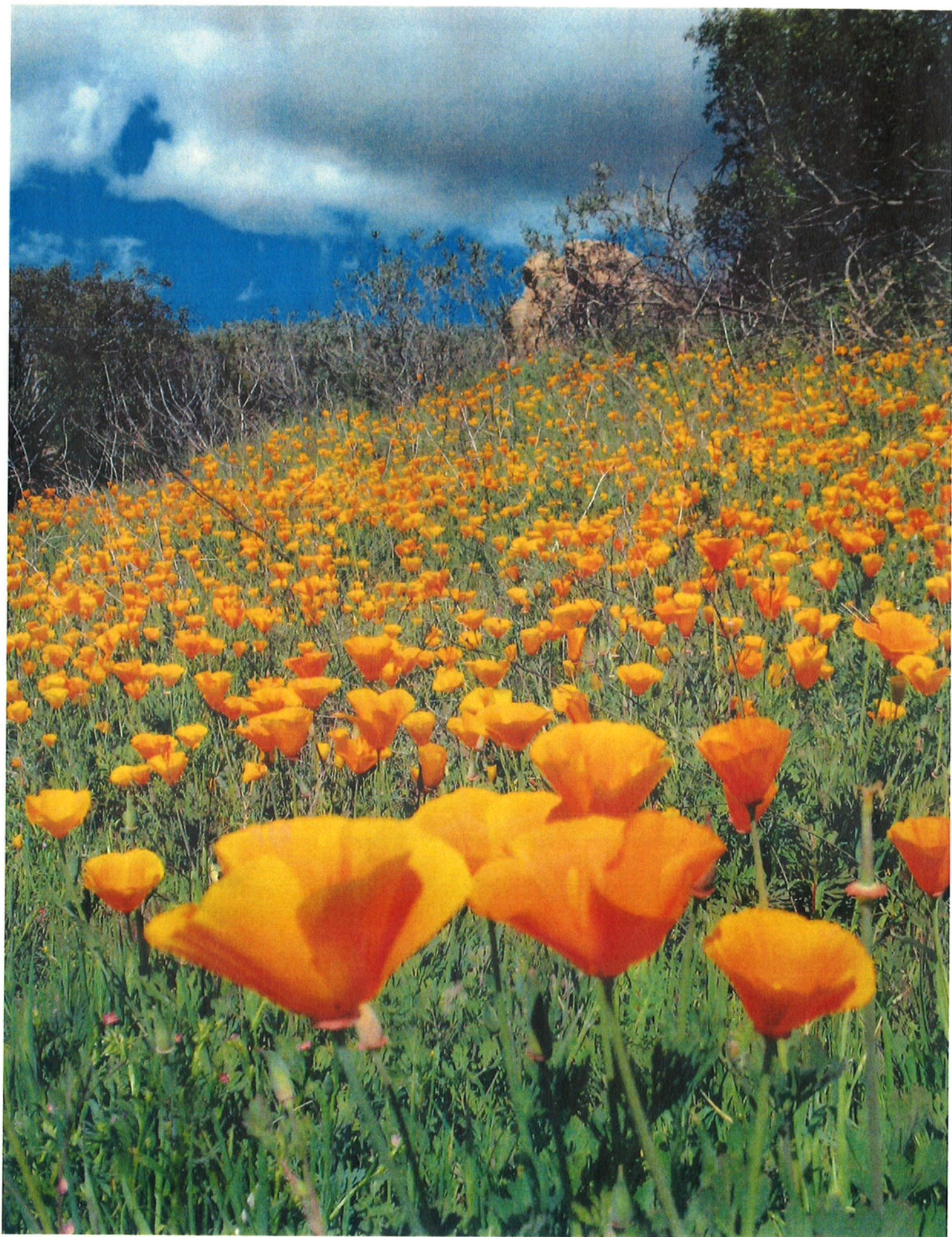
Yours truly,



David W. Dassler  
Remediation Program Manager

Attachments

























































































































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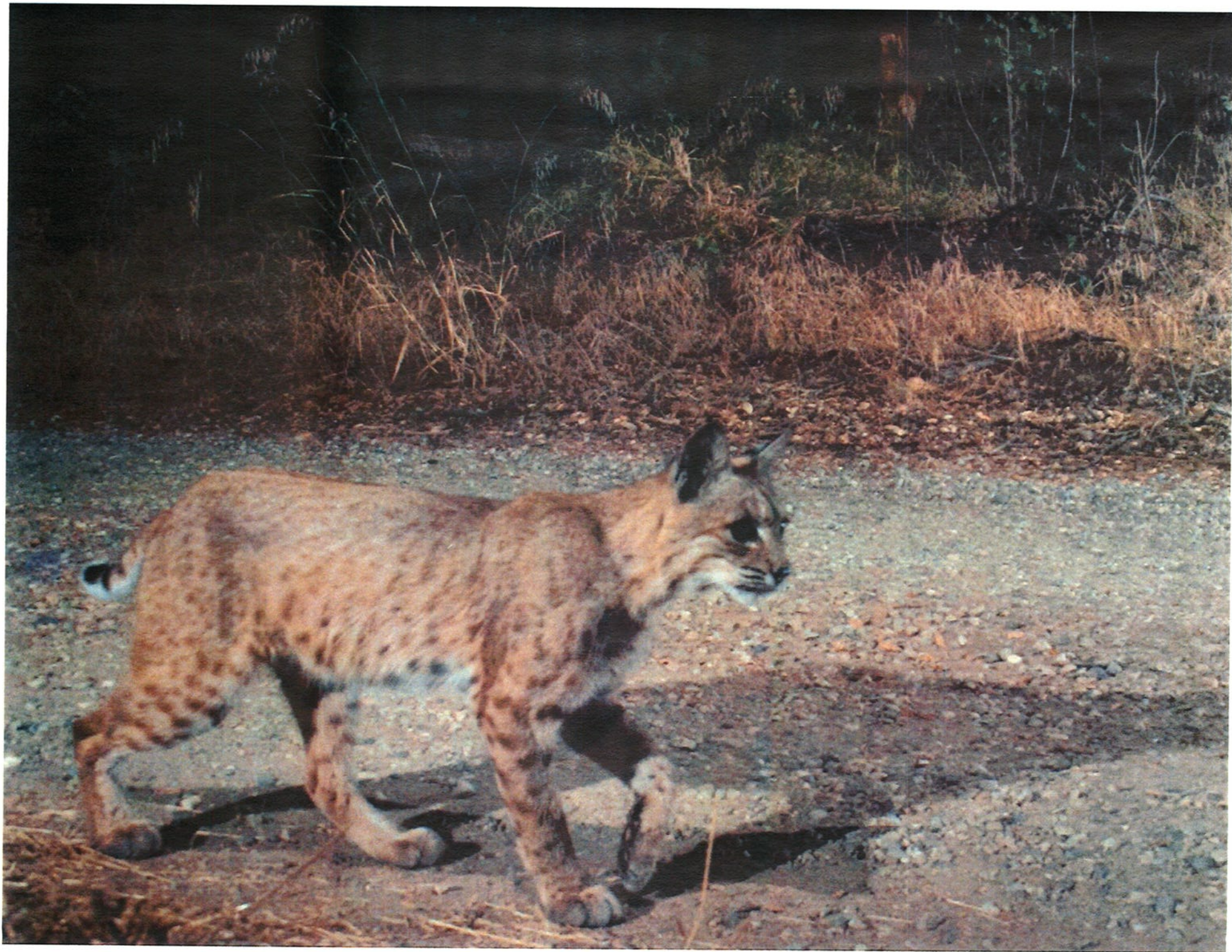




















Roy Dunn [www.humanstohummingbirds.com](http://www.humanstohummingbirds.com)





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