



# Ventura Audubon Society

December 16, 2020

Ventura County Planning Commission  
Resource Management Agency/Planning Division  
800 S. Victoria Avenue  
Ventura, CA 93009

Members of the Planning Commission:

Ref: Case Number PL 18-0015 Non-Coastal Zoning Ordinance Amendments:

On behalf of the Ventura Audubon Society and its 600 members, we wish to encourage your support for PL 18-0015. Our chapter's mission is the conservation and restoration of bird populations and wildlife habitat. Birds thrive where ecosystems are diverse, and diversity benefits all forms of life including humans. Birds also offer us a richer, more beautiful, and healthful place to live.

Loss of habitat as the result of development and climate change is the greatest threat to birds and other wildlife. Development has fragmented natural habitat, eliminated entire plant communities that native birds require to survive, and it has introduced toxins that kill wildlife. Furthermore, Audubon scientists have determined that two thirds of all North American bird species are at increased risk of extinction due to climate change. This represents almost 400 species of birds. Pollinators are also at risk, which are critical to the entire food web and for human agriculture. Altering our landscaping practices can mitigate these impacts.

Audubon has already devoted resources to researching and publishing guidelines to improve landscaping practices that will benefit birds. Based on this body of work, we recommend incorporating the following into Section 8106-8.2.3:

1. Revise Section 8106-8.2.3 (d)(4) to increase the number of species required to 9 in a landscape plan, so that each season (spring, summer/fall, winter) has a minimum of 3 species that flower for food/pollen sources. If there is an issue with a landscape plan meeting this requirement, Section 8106-8.2.3(d)(6) allows for site specific modifications. *Source: NRCS Biology Technical Note NO. CA -19, 190-VI; ECS - Pollinator Biology and Habitat in California.*
2. Require at least 70% of species planted are native to our ecoregion.
3. Require that flowers of the same kind are grouped in large drifts in the landscape design using a minimum of five plants or one square meter size of the same kind. This will support the hydrozone policy 8106.8.2.3(c)(2) and increase attractiveness to pollinators and foraging efficiency.

**P.O. Box 24198. Ventura, CA 93002**  
<https://www.venturaaudubon.org/>

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4. Pesticides, especially neonicotinoids, kill many pollinators; so, minimizing or eliminating their use will support biodiversity.
5. Provide up to 5% of the landscape area as exposed ground without weed fabric or mulch. Select sunny locations with well drained soils or leave 6-12 inches around the base of plants without mulch.
6. Require at least 6 different types of plants that provide sufficient pollen and nectar sources for each season in landscape plans greater than 5500 square feet.
7. Require at least 5 larval host plants for butterflies and moths for landscapes greater than 5500 square feet, and a minimum of 3 host plants for landscape areas under 5500.
8. Include a standard to incorporate different canopy layers in the landscape by planting trees, shrubs, and different sized perennial plants for roosting, nesting and protection against weather and predators. (Source: *A Regional Guide for Farmers, Land Managers, and Gardeners In the Ecological Region of the California Coastal Chaparral Forest and Shrub Province along the southern California Coast a nappc and Pollinator Partnership™ Publication*)
9. We suggest adding the following brochure as a reference:  
[https://d2vv0elwkd9lnk.cloudfront.net/resource\\_files/Simple%20Steps%20to%20Create%20a%20Native%20Plant%20Garden%20in%20Your%20Yard\\_0.pdf](https://d2vv0elwkd9lnk.cloudfront.net/resource_files/Simple%20Steps%20to%20Create%20a%20Native%20Plant%20Garden%20in%20Your%20Yard_0.pdf)

The guidelines recommended here are part of a nationwide Audubon movement to inspire people to improve their communities. Indeed, many Audubon chapters across the country (including our neighbor Conejo Valley Audubon) sponsor lawn to native garden conversion programs and incentives for creating bird friendly habitat.

We believe that PL 18-0015 with our recommended guidelines would go far in accomplishing a better and more bird friendly community in Ventura County. We can set an example to other communities, send a message that conservation is important, and provide better habitat for local bird species at risk of extinction struggling with climate change. We welcome the opportunity to discuss this further, please feel free to contact us to discuss any of these recommendations.

Sincerely,

Bruce E. Schoppe

Bruce E. Schoppe (Dec 16, 2020 14:24 PST)

Bruce E. Schoppe  
[vpconservation@venturaaudubon.org](mailto:vpconservation@venturaaudubon.org)  
Vice President, Conservation  
Ventura Audubon Society

Cynthia Hartley

Cynthia Hartley  
[ed@venturaaudubon.org](mailto:ed@venturaaudubon.org)  
Executive Director  
Ventura Audubon Society

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