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RE: Comments on Chapter 2 - General Plan Background Report: Demographics and Economics

We want to thank the County for compiling such a detailed background report on demographic and economic trends in Ventura County. The breakdown of data on jobs, wages and poverty levels by Planning Area and Census Designated Places is particularly useful as it demonstrates a wide range of differing economic circumstances throughout the county. This will help future policy-making efforts by allowing the County to evaluate future regulations or initiatives on whether they meet the employment needs of a broad cross-section of county residents.

We recommend that changes be made, however, to the Background Report to improve its usefulness in informing future policy decisions, particularly in the sections on the agriculture and tourism industries in Ventura County. The Market Outlook sections for both Agriculture and Tourism contain speculation on job growth through specific activities. However, the Background Report should include a frank assessment of the limitations that current County policy places on growth in these sectors.

For example, in the Market Outlook section on Agriculture, the Background Report says that there "may be a demand for increasing value-added food processing, organic farming, commodity packing, shipping and distribution in the County, some of which may result in increased jobs in the unincorporated area."

With respect to food processing, facilities other than wineries are only allowed in the limited industrial zones in the unincorporated area and are not generally compatible uses within cities. In addition, the limitations in the SOAR ordinance on the small allowance for designation changes on Agricultural lands to accommodate food processing is unlikely to create significant jobs. While the background report correctly states the potential demand for food processing, the Ventura County Zoning Ordinance would need to be revised to allow a broader range of pre-processing activities in agricultural areas to increase agricultural job growth in the unincorporated areas.

In addition, we fail to see job growth from the demand for "organic farming" as this would replace acreage in conventional farming. Likewise with commodity packing, shipping and distribution - with the current water restrictions and other regulations placed on agriculture, it seems highly unlikely that more acreage or a higher volume of products will be grown in Ventura County by the General Plan horizon of 2040.

A similar problem exists in the Market Outlook section on Tourism, specifically the discussion of agri-tourism. The Background Report states that "Ventura County may be well positioned to expand lodging as part of an increased emphasis on agri-tourism." However, hotels and motels are not allowed in open space and agricultural zoning with the exception of Boarding Houses and Bed-and Breakfast Inns. The current permit requirements in the Non-Coastal Zoning Ordinance for these structures preclude any growth in this sector. Unless the cities themselves provide it, there is no existing way to expand the supply of lodging for agri-tourism in the unincorporated areas.

Similarly, the Background Report's discussion of other counties' ability to offer farm and wine trails, ranch stays and other local farm experiences ignores the fact that many of these are either unlikely in Ventura County (the glassy-winged sharpshooter infestation inhibits grape growing in the county) or prohibitively expensive, as many of the activities necessary for agri-tourism require Board of Supervisors Approval. The existing barriers to agritourism activities make it an extremely unlikely source of economic growth in the County.

We understand that the Background Report is a descriptive document rather than a policy platform. However, where aspirational goals or speculation on areas for future growth are discussed, the document should include a realistic assessment of whether current policy inhibits or allows those activities.

We look forward to engaging with the County in the future as the General Plan Update process moves forward.

Sincerely,

Sean Paroski

Director of Policy and Advocacy

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