



November 5, 2018

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Ventura County Board of Supervisors
800 S. Victoria Blvd.
Ventura, CA 93003

Richard Rodriguez
Chair
Ventura County Planning Commission
800 S. Victoria Blvd.
Ventura, CA 93003

Re: General Plan Update Alternatives

Dear Chair Foy and Chair Rodriguez:

We recommend a number of changes to ensure that land use alternatives in the General Plan Update recognize the unique challenges facing Ventura County, both economically and through quality of life issues such as lack of housing. These changes will help create a regulatory environment that allows for the flexibility needed to meet the needs of the county over the next 20 years and beyond.

An immediate issue that needs to be addressed is that the Guiding Principles in section 7.1 of the Alternatives Report do not match the changes made by the Board in their January 23, 2018 session. In particular, the Guiding Principles in the Alternatives Report omits references to the economic vitality of agriculture and enhancing the existing housing supply. These changes should be added to the Alternatives Report to faithfully reflect the direction given by the Board.

Another beneficial change would be realized through enhancing the Agricultural Element by including all of the goals and policies for farmland resources found in SOAR. These goals and policies properly belong in the new Agricultural Element and including them there would emphasize the importance that voters placed on preserving our local agricultural industry when they passed SOAR.

The Agriculture Element would also benefit through the inclusion of language that expands opportunities for agricultural processing, pre-processing and packing facilities. The County could expand the definition in the NCZO of the term “pre-processing”, which is outdated and irrelevant. The County could create more options for bagged and juice box products, such as allowances for some additives that would foster more options for field processing of avocados, lemons and strawberries into guacamole, lemonade and purees.

We also support all the recommendations made by the Agricultural Policy Advisory Committee found on pages 19 and 20 of the staff report. (As a side note, the Alternatives Report as well as the staff report incorrectly identify them as the Agricultural *Preserve* Advisory Committee. This should be corrected). However, we recommend that the suggested policy for “incentivize soil and land conservation” found on page 20 of the staff report should also be discussed at APAC. This policy involves consideration of local crop types, soil types, soil chemistry, climate and the feasibility of practices for local farmers. These issues are best discussed at APAC in consultation with experts including local soil scientists.

We are troubled by the continued exclusion of state water from consideration in discussions on expanding local water supply. This exclusion simply ignores the current reality of water policy in the county, where many agencies, including Ventura Water, United Water Conservation District and Calleguas Municipal Water District, are actively exploring projects that would expand access to the State Water Project. The county needs language in the Alternatives Report that will support these projects and assist local water agencies in their efforts in providing a reliable, affordable water supply.

Similarly, we disagree with the framing of this passage of the Alternatives Report found on page 9-16: "Land use choices have a long-lasting effect on water demand. When evaluating the feasibility of possible land use patterns, the County should work with water agencies to consider projected available water resources under a changing climate, and water conservation measures to ensure a sustainable water supply, rather than simply deferring to water agencies to meet any projected demand."

We feel that this passage creates an assumption of scarcity which will drive future land use considerations, as well as freeing the County of any obligations to work with local agencies to develop new projects. It also ignores the language in the Water Resources Guiding Principle calling on the County to develop water resources. Combined with the exclusion of state water from the Water Element, we feel that the language in the Alternatives Report does not accurately reflect the Guiding Principles related to water.

Finally, we support the Land Use policy goal found on page 17 of the staff report: *Coordinate with cities and LAFCO to reduce/streamline existing challenges for development projects*. There is broad recognition that LAFCO has become an impediment to common-sense solutions to our housing and infrastructure challenges. A particularly beneficial move for LAFCO to take would be to create a carve out for farmworker housing on agricultural lands with respect to connecting to county water and sewer districts for new and expansions to services. The County should take the lead on

ensuring that LAFCO and the cities are working together to achieve common goals, rather than working at loggerheads.

We believe that these changes outlined above would greatly enhance the Alternatives Report. Creating more opportunities for agriculture, enhancing our water supply and better coordination with LAFCO will all go a long way toward solving some of the pressing issues facing our county.

Sincerely,

A handwritten signature in cursive script that reads "Lynn Jensen". The signature is written in black ink and is positioned below the word "Sincerely,".

Lynn Jensen
Executive Director