



**Ventura County Coalition of  
Labor, Agriculture and Business**

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May 11, 2015

Mr. Kai Luoma – Executive Officer  
Ventura Local Agency Formation Commission  
800 S. Victoria Avenue  
Ventura, CA 93009-1850

**RE: Comments to the LAFCo Board on the Proposed Agricultural Mitigation Workshop**

CoLAB, Ventura County is a non-profit organization with over 400 members of which 85% are agricultural businesses and farm and ranch families throughout the County. We addressed the board on April 22<sup>nd</sup> and would like to summarize and expand on our testimony related to the issue of agricultural mitigation within the city spheres.

It is our understanding that the reason for the workshop is to investigate the potential of having an agricultural mitigation policy adopted into the Agricultural Preservation Policy of the Commissioner's Handbook. In 2005, the Commission adopted policy language providing that application proposals submitted to LAFCo involving agricultural land include specific supplemental information regarding the "effect of the proposal on maintaining the physical and economic integrity of agricultural lands."

With respect to the draft agenda we have the following comments:

Item 4 – Overview of CEQA requirements pertaining to preservation of agricultural land  
*Presented by LAFCo staff:*

We would like to see a presentation of the case law pertaining to agricultural mitigation, specifically *Masonite v Mendicino* in the context of whether CEQA could be utilized to accomplish what other LAFCOs have done by ordinance.

In addition, we suggested in our testimony that LAFCo prepare a map showing the areas of the County that are within the spheres of influence that would be subject to a mitigation policy that would apply to prime farmland. Responses from staff at the April board meeting indicated that this would be an impossible task. However, if members of the public and the LAFCo board have no idea how much acreage is involved and which parcels, it would be difficult to adopt and determine the impacts of proposed mitigation policies.

Item 5 – Discussion by the Agricultural Commissioner on Agricultural Land Conversion in Ventura County in recent years:

We believe the scope of the land conversion presentation should include agricultural lands that have been entered into Open Space / Wildlife Habitat Land Conservation Act contracts which will ultimately be converted to open space. This is essentially farmland that will be lost. The Nature

Conservancy has acquired thousands of acres of land along the Santa Clara River with the intention of agriculture to be “phased out for the conversion to natural open space”. We would like to know from the County Planning Division how many acres of farmland have been entered into these contract types.

#### Item 6 – Mitigation Options:

We recommend Agricultural Commissioner Henry Gonzales be included in the presentation of potential agricultural mitigation options at the workshop to support the continued viability of farming on local agricultural land. In addition, as the AG Commissioner functions as both a regulator and advocate for agriculture in Ventura County, we believe he should be included in the decision making process regarding any LAFCo decision with respect to agricultural mitigation.

We do not support agricultural mitigation policies that would mitigate for the potential loss of farmland by turning comparable agricultural land into open space. That does not mitigate for the loss of agriculture and will potentially introduce conflicts with agricultural uses. With respect to this, we point out that there has been concern from adjacent farmers regarding lands purchased by the Nature Conservancy along the Santa Clara River which were entered into Open Space/Wildlife Habitat Land Conservation Act contracts. In letters to the Board of Supervisors in both 2009 and 2011, adjacent farmers expressed concern about the introduction of pests, insects and fungi, affect to certified organic growers, drainage causing flooding to adjacent properties, and damage to crops from public access. Specific to the 2011 contract near Bardsdale, adjacent farmers expressed concern about the maintenance of a Watershed Protection District levee that protects adjacent agricultural land. If the Nature Conservancy is a presenter at the workshop we would like them to address this issue.

In addition, we recommend that LAFCo contact John Lowrie of the State Department of Conservation (DOC) to be a presenter at the workshop discussing true agricultural conservation easements. John is the Assistant Director of the Division of Land Resource Protection within the DOC. These easements are specifically designed to keep properties in agricultural use in perpetuity. His phone number is (916) 324-9013. In a conversation with John he stated that the biggest loss of agricultural land statewide is long term fallowing due to lack of water in the southern San Joaquin Valley. There has also been a statewide loss of grazing land. Some of the land has been converted to photovoltaic solar developments.

Along those lines, CoLAB believes that the only way to maintain viable agriculture in this County is to support farmers through good economic policy. We are very proud of our agricultural community which has overcome many obstacles over its long history. Agriculture here is different than many other California counties in that land prices are high and there are many threats. Particularly, the Sustainable Groundwater Management Act may leave some prime farmland without sufficient water to maintain farming.

Agricultural mitigation policies need to think out-of-the-box and consider funding for infrastructure projects to bring new water supply. In addition they should consider the dire need for farmworker housing. High housing prices and rents across the county have created crowded living conditions for farmworkers in the cities that are socially irresponsible.

With respect to agricultural mitigation measures, cities should be well represented in the process. Eight cities: Camarillo, Fillmore, Moorpark, Oxnard, Santa Paula, Simi Valley, Ventura, and

Thousand Oaks adopted urban restriction boundaries, most of which were approved by the voters. This was promoted as giving these cities areas for future growth, some of which is mandated by the state. A strict one-to-one mitigation policy would add an extra, potentially insurmountable, hurdle for cities that have agricultural land within these boundaries. This would drive up the cost to build houses in the future, making it even harder for low income families to afford to live here. It is imperative that any mitigation option be discussed with potential economic and social consequences.

Item 7 – Case Studies:

CoLAB recommends that Counties that are contacted to present case studies are requested to provide the following information:

- Whether or not their policies were adopted prior to the Masonite CEQA case;
- Whether or not the county has adopted urban growth boundaries and if they are subject to a public vote;
- An economic analysis of the adopted agricultural mitigation measures;
- Have the mitigation measures been practiced on any scale, have they been shown to be successful, and what would be the measure of success?
- Any available perspective of agricultural landowners

With respect to the draft list of stakeholders:

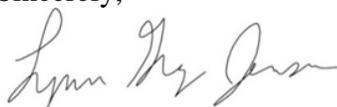
We would like to add the following to the notification list:

- Ventura County Cattlemen’s Association – email to Linda Caruso [coyote.creek1@verizon.net](mailto:coyote.creek1@verizon.net)
- Ventura County Chapter of the California Women for Agriculture [yccwawebmaster@gmail.com](mailto:yccwawebmaster@gmail.com)

CoLAB is committed to the continuation of a vibrant agricultural industry in Ventura County that contributes \$2.1 billion to our local economy and provides us with an abundance of healthy fruits and vegetables for our tables. We have many resources and look forward to contributing to the stakeholder process at this workshop.

Thank you for the opportunity to comment.

Sincerely,



Lynn Gray Jensen  
Executive Director

cc:

City of Camarillo, City of Fillmore, City of Moorpark  
City of Oxnard, City of San Buenaventura, City of Santa Paula  
City of Simi Valley, City of Thousand Oaks