



April 24, 2017

Ventura County Planning Division  
800 South Victoria Ave  
Ventura, CA 93009

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**Re: Comments on Chapter 9 - General Plan Background Report: Agriculture**

In general, the draft Agriculture Chapter of the Background Report does not effectively characterize the importance of agriculture and the needs of the industry to retain its current planted acreage in the County. Agriculture is more than a land use designation. It is more than a placeholder to limit growth and maintain a free viewshed. Farming and ranching permeate the culture in Ventura County. Many of the streets are named after farming families, some families who have farmed for over a century. Agriculture is unique in Ventura County and needs to be characterized by more than just farm size, crop types, land use designations and farmland maps.

In the Community Outreach sessions, Agriculture and Farms rate #2 in all three categories including what residents love about the county, our biggest challenges and what could make our community better. The unprecedented challenges farmers face in Ventura County need to be addressed in the three sections of the Agriculture background report.

General Recommendations:

- 1) Add a subsection in this chapter devoted to the history of farming in the County and that the Agricultural Commissioner and the Farm Bureau Ventura County be consulted for pertinent facts.
- 2) General Plan consultants should include the San Luis Obispo General Plan in their research for goals and policies that support agriculture:  
[http://www.slocounty.ca.gov/Assets/AG/landuse/Agriculture\\_Element.pdf](http://www.slocounty.ca.gov/Assets/AG/landuse/Agriculture_Element.pdf)  
These policies include language that commits the County of SLO to rapid and efficient permit processing procedures. SLO County also has a Transfer of Development Credits program to help protect agricultural resources by guiding development to more suitable areas.

**SECTION 9.1 AGRICULTURAL RESOURCES**

**Subsection: Major Findings**

**Recommendations:**

- 1) Bullet 2: Add the following at the end – In contrast, the total water demand for municipal and industrial uses increased by 10.7% due to increased urbanization.
- 2) Bullet 3: Need a better characterization of the cause of the loss of CA Department of Conservation FMMC Important Farmland from 2004 to 2014 and the increase of “Other Land”. This finding relating to conversion of Prime farmland is misleading and the County needs to contact the DOC to determine the cause of the loss reported in this finding.
- 3) Bullet 4: Recommend that this finding be replaced with:  
Approximately 118,000 acres of Important Farmland was identified by the State Department of Conservation in their 2014 report in Ventura County.

High quality soils of the Prime and Statewide Farmland represent 74,000 acres of this Important Farmland inventory. In addition, the State recognizes approximately 198,000 acres of grazing land in Ventura County.

- 4) Add a finding that there was very little loss of grazing land over time in Ventura County.

Subsection: Department of Conservation Farmland Mapping and Monitoring Section

Recommendations:

While many of the statistics are well presented, the analysis of the State Important Farmland statistics are difficult to follow and are not well stated.

- 1) Need a definition of why 555,000 acres were chosen to be inventoried by the FMMP.
- 2) Need an explanation of the conversion of Important Farmland to "Other Land"

Subsection: Water

Recommendations:

This section is very limited compared to the critical importance of water to agriculture.

There is an entire section on surface water for in-stream environmental uses, but no section covering the surface water use for agriculture.

- 1) Water from the Freeman Diversion in Saticoy are critical, supplying water for half of the agricultural lands in the County which is not even mentioned in the background report. In addition, the Los Robles Diversion in Ojai is critical for agriculture in the Ventura River Watershed. Agriculture is dependent on surface water in many areas of the County and this needs to be thoroughly addressed in this background section.
- 2) Check with the AG Commissioner to confirm the Water Use by Crop Type Table 9-6 for crops in Ventura County.
- 3) Move the section on in-stream and environmental uses of water to the Natural Resources Chapter.
- 4) Sentence on Imported Water should recognize Calleguas Municipal Water District after Metropolitan MWD.
- 5) Need to summarize and reference the sections in the Water Resources Chapter on the groundwater basins as 84% of AG water comes from groundwater.

## SECTION 9.2 AGRICULTURAL PRODUCTION

Subsection: Introduction

Without farmers there is no agricultural production. There are many challenges to agricultural production in Ventura County and these need to be discussed in the General Plan background report.

Recommendations:

- 1) Need to add a discussion on challenges for agriculture relating to labor shortages, lack of farmworker housing, distribution of pests, pesticide regulation, and lack of state of the art distribution infrastructure.
- 2) Need to include maps of the significant pests threatening crops including lemons and avocados in VC.

Subsection: Major Findings

Recommendations:

- 1) Bullet 2 - the 2012 Census of Agriculture is suspect with respect to its statistics. This major finding is not supported by evidence and should be removed. As defined by the Census, the "Land in Farms" includes agriculturally productive land as well as pastures, grazing land, woodland and wasteland, which are not always considered for having agricultural uses. This is misleading and will be misinterpreted as conversion to urban development.

- 2) The Agricultural Commissioner Crop report should be the standard for characterizing Ventura County agriculture and this Chapter should be updated with the statistics from the 2016 report when released.
- 3) Bullets 3 and 4 need to be ground checked by the Farm Bureau Ventura County and the AG Commissioners Office.

Subsection: Decade of Change

Recommendation: This paragraph needs to be fact checked with the Agricultural Commissioner and the Cattlemen's Association and likely removed. The amount of farmland has not changed appreciably over the last decade and certainly not by 51,325 acres. The State Important Farmland mapping shows no significant loss of grazing land either.

Subsection: Farm Characteristics

Recommendation: Market Value of Agricultural Products sold in Ventura County is meticulously compiled by the AG Commissioner annually for Ventura County Agriculture. Figure 9-9 and Tables 9-9 and 9-10 should be derived from the AG Commissioner statistics from the most recent crop report. This subsection reports that the 2012 Census of Agriculture is different from the VC AG Commissioner Crop Report but doesn't say what the differences are or the significance. Better statistics should be provided from the 2016 Crop Report for a General Plan that will project trends until 2040.

Subsection: Commodities on Farms

Recommendation: Again, berry sales and fruit production should be summarized in Tables 9-9 and 9-10 from the AG Commission Crop Report and updated for 2016 numbers as the trends are changing significantly.

Subsections: Commodities and Values and Organic farming

Recommendation: Recommend that these sections have updated values from the 2016 crop report that will be published in 2017

Subsection: Commodity Processing

Recommendations:

- 1) This section is not accurate. The NCZO permits preliminary food processing with or without structures on OS, AE, RA, RE and TP. But pre-processing inside a structure requires a Zoning Clearance or Conditional Use Permit depending on size. The existing language in the NCZO with respect to processed commodities does not refer to "intensive operations" or "industrial use". Rather it precludes canning, bottling, and supplementing with preservatives, coloring agents, or chemical alteration. Freezing or flash freezing is not processing and is allowed. Need to consult the Planning Division to see if oil extraction would be allowed under the current NCZO language.
- 2) It is interesting that the NCZO allows wine processing (bottling) but not food processing in a County where grapes are not a key commodity. In the future, the types of processing that would be helpful in Ventura County would be adding preservatives to packaged products to allow the making of guacamole, lemonade and berry preserves in the A-E zone. We recommend a change in the NCZO to allow this limited processing.
- 3) Need to add that food processing is allowed in Industrial zones M-1, M-2 and M-3 per the NCZO.

## SECTION 9.3 AGRICULTURAL POLICIES AND PROGRAMS

### Subsection: Major Findings

Significantly, this Major Findings section represents only policies for preservation of agricultural lands and is severely lacking in policies pertaining to "agricultural advancement". The draft document seems to be content in concentrating on preservation and missing the importance of the economic viability of agriculture, which will ultimately determine its future.

Agricultural members of the CoLAB Organization negotiated many of the new goals and policies pertaining to the economic viability of agriculture in the 2016 SOAR Ordinance that speak to the economic viability of agriculture.

Recommendation: In the Major Finding subsection, include a summary paragraph of the new and amended goals and policies that support the economic viability of agriculture that were passed in the 2016 SOAR Ordinance.

Subsection: Existing Conditions / California Land Conservation Act

Recommendation: Remove the paragraph on Open Space and Special Area LCA contracts in the Agriculture Chapter as they have no relevance to agriculture in Ventura County. This language should be added to the Natural Resources Chapter.

Subsection: Existing Conditions / Save Open Space and Agricultural Resources

Recommendation: List the new and amended goals and policies that have been added to the Agricultural, Open Space and Farmland Resources sections of the General Plan by the 2016 SOAR Ordinance as follows: (deletions are strikethroughs, additions are in italics)

Land Designation – Agricultural: New and Amended Policies:

- ~~Identify~~ *Recognize* the farmlands within the County that are critical to the maintenance of the local agricultural economy and which are important to the State and Nation for the production of food, fiber and ornamentals.
- *Promote the economic viability of agricultural lands by assisting agricultural producers and establishing zoning policies that support long term investments in agriculture.*
- Establish policies and regulations which ~~restrict~~ *encourage* agricultural land to *remain in* farming and related uses. ~~rather than other development purposes.~~
- *Subject to state law, the Guidelines for Orderly Development, and applicable zoning requirements, actively promote infrastructure, sized not larger than necessary for the specific project, for farmworker housing to support the continuing viability of agriculture.*

Land Designation – Open Space: New and Amended Policies:

- Retain open space lands in a ~~relatively undeveloped~~ *non-urbanized* state so as to preserve the maximum number of future land use options.
- Define urban areas by providing contrasting but complementary areas which should be left generally ~~undeveloped~~ *non-urbanized*.
- *Land Conservation Act (LCA) Contracts shall be encouraged on farming and grazing and open space lands.*
- *Support the productive activities of Open Space designated lands, commonly used for agriculture, grazing, and ranching that are important to the overall economy of Ventura County.*

Resources – Farmland Resources: New and Amended Goals:

- Preserve and protect ~~irrigated~~ agricultural lands as a nonrenewable resource to assure the continued availability of such lands for the production of food, fiber and ornamentals.
- Encourage the continuation and development of facilities and programs that *support agricultural production and enhance the marketing of County grown agricultural products.*
- *Improve the economic viability of agriculture through policies that support agriculture as an integral business to the County.*
- *Encourage opportunities for Ventura County residents to buy local agricultural products.*

Resources – Farmland Resources: New and Amended Policies:

- Land Conservation Act (LCA) Contracts shall be encouraged on ~~irrigated~~ *farmlands and open space lands.*

Subsection: Existing Conditions / Ventura County Non-Coastal Zoning Ordinance

Recommendation: Add that the Ventura County NCZO specifically regulates agricultural processing through the land use matrix and the glossary describing “Preliminary Processing” and “Processed Commodities.”

Thank you for the opportunity to submit comments and engage in the General Plan process.

Sincerely,

A handwritten signature in black ink that reads "Lynn Gray Jensen". The signature is written in a cursive, flowing style.

Lynn Gray Jensen  
Executive Director