

February 6, 2020

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Franca Rosengren, Project Manager
Ventura County Subdivision Ordinance Comprehensive Update
800 South Victoria Avenue, L#1740
Ventura, California 93009
(via email)

RE: Follow up to CoLAB comments at Feb. 4, 2020 Workshop

Dear Ms. Rosengren:

Thank you for the opportunity to provide comments on the proposed Subdivision Ordinance update. We appreciated the open discussion at the workshop earlier this week and are submitting the comments below to follow up on that conversation.

General Comments

A legislative version of the proposed changes to the Subdivision Ordinance has not been provided for public review. As indicated in the County Administrative Policy Manual: Operating Procedures for Board of Supervisor Meetings and Agendas, "...for an ordinance to be considered for revision or amendment by the Board [the packet] must include a "strike-out" version (also known as a legislative version) along with the "clean" revised version of the ordinance. The strike-out" version will have strikes through words to be deleted and new language will be highlighted."

The draft update contains significant revisions, additional language, deleted language, and re-organization of articles from the existing Subdivision Ordinance. However, there are significant portions of language in the draft update that was "cut-and-pasted" directly from the existing ordinance, with minimal modifications or distinct "bullet item" additions/deletions. These modifications are difficult for the public to find and identify, as they require a "line-by-line and word-by-word" comparison with the existing Ordinance.

We encourage the County to make every effort to provide a legislative version for the public to review prior to this item being presented to the Ventura County Planning Commission. This should include headings that clearly identify new articles, deleted articles, and reference the new section numbers for articles that have been rearranged.

Parcel Map Waivers

Page 24, Article 4: Proposed modifications to this section include removal of waivers for lot line adjustments, large lot subdivisions, mergers, and the creation of conservation subdivisions.

Page 86, Article 11, Sec. 8211-6-a: *“The conservation easement or deed restriction used for the conservation parcel, which shall be subject to Planning Division review and approval prior to recordation, shall be prepared by a licensed surveyor, include a formal legal description of the entire lot, and include a metes-and-bounds legal description and graphic depiction of the conservation area. The conservation subdivision, including the parcel map and legal description, shall be recorded in the Office of the County Recorder.”*

These modifications may add significant costs to landowners who wish to place portions of their property into conservation. Increasing costs may prohibit or dissuade some landowners who would otherwise wish to enter into conservation agreements from doing so and may impede the success of goals and policies proposed by the Board of Supervisors to expand and encourage agricultural and open space land conservation and preservation.

CoLAB strongly encourages the County to remove these requirements from parcels that are being subdivided for conservation purposes. As suggested at the workshop hosted by the County on February 4, 2020, modifying this language to require a parcel map be developed for only the non-conservation portion of the subdivision may avoid discouraging land conservation efforts, while providing the County with information necessary for legal records.

Thank you again for the workshop discussion and the opportunity to provide input on the proposed modifications to the Ordinance.

Sincerely,

A handwritten signature in black ink, appearing to read 'Louise Lampara', with a long horizontal flourish extending to the right.

Louise Lampara
Executive Director