

August 1, 2019

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Ventura County Board of Supervisors  
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Ventura, CA 93009-1740

Clerk of the Board: [clerkoftheboard@ventura.org](mailto:clerkoftheboard@ventura.org)

**Re: General Plan Update 2040 – Comments on the Agriculture Element**

Dear Honorable Members of the Board of Supervisors,

The Agriculture Element of the General Plan Update will apply to the existing 95,000 acres of local agricultural lands that produce specialty crops, and contribute \$2 billion to the Ventura County economy. Specialty crops are defined by US Department of Agriculture as: “fruits, vegetables, tree nuts, dried fruits, horticulture, and nursery crops (including floriculture)” and comprise 99% of agricultural production in Ventura County. Yet, not a single one of the six goals in the Agriculture Element, as written, support these specialty crops.

Specialty crops have a unique and limited growing range based on climate and soil type that have allowed them to be competitively grown in Ventura County for generations. It is important that these crops are recognized and encouraged in the new Agriculture Element as they support the Mediterranean-style diet that has been recently attributed to healthy weight, heart and brain function. This diet includes avocados, lemons, spinach, cabbage, berries and other fruits and vegetables grown right here in Ventura County.

The Agriculture Element fails to implement the Agriculture Guiding Principle adopted unanimously by the Board of Supervisors in 2018: **“Promote the economic vitality and environmental sustainability of Ventura County’s agricultural economy by conserving soils/land while supporting a diverse and globally-competitive agricultural industry that depends on the availability of water, land, and farmworker housing”.**

The resulting Agriculture Element fails to balance the economic vitality and environmental sustainability of agriculture that was envisioned by the collaborative effort of stakeholders.

In addition, the Agriculture Element, along with other General Plan Elements, violate SOAR, a ballot measure passed by a vote of the people in 2016, by altering the language and minimizing key GOALS that support the local production and sales of Ventura County specialty crops.

Fortunately, there were excellent recommendations by the subject experts in the Agriculture Focus Group with proposed revisions by County Planning documented in Exhibit 41.

The language of Exhibit 41 was further improved by County AG Commissioner comments at the Planning Commission, after which, the Planning Commissioners recommended further improvements that were passed unanimously.

Planning Commission revisions to Exhibit 41 restore original SOAR language, add important programs to encourage facilities and programs to support local agriculture, Land Conservation Act contracts and farm stands, adding a farmworker housing policy, and most importantly revises Section 8.3 to support specialty agriculture and innovation. These revisions, if adopted by the Board of Supervisors will significantly improve the Agriculture Element.

Most important are the Planning Commission revisions to Section 8.3, which begins with the sentence: *“Ventura County’s agricultural sector is a leading economic driver.* However, as written, it does not characterize what makes our agricultural sector so successful. Innovation in water conservation and research on new crops, like the potential new strawberry varieties from UC Davis, hold great promise for the future of Ventura County agriculture.

We are very concerned about comments from other organizations proposing goals and programs for agriculture that are contrary to the subject experts, Agricultural Commissioner comments and the Planning Commission. Many of these comments lack understanding of the realities of Ventura County agriculture. These primarily climate-based comments place unrealistic demands on the growing of crops without any analysis of the potential damage to the environment including reduced healthy food production, increased nitrates in the groundwater and epidemics of invasive pests that could result from many of the policy restrictions.

Local farmers and ranchers take great pride in the high quality and safety of Ventura County agricultural products and their existing ability to compete in global markets. The above recommended revisions are vital to encourage investment in Ventura County Agriculture with its \$2 Billion contribution to the local economy. This General Plan Agriculture Element with the recommended changes will help support Ventura County Agriculture for the long term, keeping agriculture viable, in keeping with the true purpose of the SOAR Ordinance.

Thank you for the opportunity to comment on the General Plan Update 2040. VC CoLAB Comments on the Agricultural Element are specified in Appendix A below.

Sincerely,

A handwritten signature in black ink, appearing to read "Lynn Gray Jensen". The signature is fluid and cursive, written in a professional style.

Lynn Gray Jensen  
Executive Director

CC: Susan Curtis, Manager, General Plan Update, [Susan.Curtis@ventura.org](mailto:Susan.Curtis@ventura.org)

**Attachment A**  
**Agriculture Element Comments**  
(red strikethrough = delete; red underline = add)

1. Section 8: VC CoLAB recommends adoption of all of the Planning Commission's unanimous changes to the Agriculture Element. We further recommend moving three key misplaced SOAR goals from Section 8-1 (Agricultural Land Preservation) into the revised Section 8.3 (Specialty Agriculture), along with policy and language changes to honor SOAR and the Agriculture Guiding Principle:
  - Section 8-3: ~~Niche and~~ Specialty Agriculture (Changes per the Planning Commission)
    - Goal AG-3: To promote the expansion of agricultural activities to include ~~organic and new niche and~~ innovation in specialty agricultural practices and products.
      - Policy AG-3.1: ~~Small Locally Owned Farms and Specialty Products~~: The County shall support ~~small and locally owned farms and ranches~~, the growing of specialty products and innovative and high-value crops, and specialized animal facilities and rearing methods. (RDR, JP) [Source: New Policy]
      - Policy AG-3.2: **Integrated Pest Management Practices**: The County AG Commissioner shall ~~encourage and support~~ continue and enhance the use of Integrated Pest Management practices to reduce pesticide use and human health risks. (JP, PI) [Source: New Policy]
      - Policy AG-3.3: **Public Education for Agricultural Products and Integrated Pest Management**: The County AG Commissioner shall collaborate with the agricultural community to provide information on Integrated Pest Management and agricultural products and practices in Ventura County. (JP, PI) [Source: New Policy]
    - Move three key SOAR Goals that do not fit in Section 8.1 (Agricultural Land Preservation) to Section 8.3 (Specialty Agriculture) under Goal AG-3 to support the growing of specialty crops.
      - Re-number Policy AG-1.6 to Policy AG-3.4: Improve the economic viability of agriculture through policies that support agriculture as an integral business to the County.
      - Re-number Policy AG-1.7 to Policy AG-3.5: Encourage opportunities for Ventura County residents to buy local agricultural products.
      - Make SOAR Policy AG-1.5 a New Program in Section 8.7 Implementation Programs: Encourage the continuation and development of facilities and programs that support agricultural production and enhance the marketing of County grown agricultural products. (to implement Policy AG-3.4 as recommended by, the Agriculture Focus Group, County Planning, the AG Commissioner and the Planning Commission).
    - Add Policy AG-3.6: "Support a diverse and globally-competitive agriculture industry" in Section 8.3 Specialty Agriculture, to support the Agriculture Guiding Principle.
    - Section 8.3: Add the important language in the Findings and Purpose Section D of SOAR supporting Ventura County Agriculture to the introductory verbiage in Section 8.3: "For agriculture to be sustainable in Ventura County, it must remain economically viable. This SOAR

*ordinance seeks to add and improve necessary goals and policies to encourage agriculture to remain viable in the County for the life of the ordinance and beyond.”*

- Section 8.5: Sustainable Farming and Ranching – This section needs to justify its focus on climate and renewable energy goals that target agricultural businesses, even though agriculture contributes only a small amount to total county GHG emissions.
  - **Add citations for the GHG emission percentages** quoted in Section 8.5 and calculate the total number of GHG emissions in the county contributed to local agriculture in Section 8.5 with a citation for the scientific analysis. (As recommended by the Planning Commission).
- 2. VC CoLAB recommends that the County add a notation in the Agriculture Element on Page 8-2 to reference that Agricultural Water goals and policies are in Chapter 9, Water Resources Element.
- 3. VC CoLAB supports the Planning Commission recommendation for the addition of a new farmworker housing policy to be added to the Land Use Element.
  - **Farmworker Housing: New Policy LU-8.5: The County shall support the development of safe and quality farmworker housing that facilitates a reliable labor force and promotes efficient agricultural operations. Housing units shall include a variety of housing types, including group quarters and larger dwelling units that can accommodate a family. (RDR) / [Source: New Policy].**
- 4. VC CoLAB supports the following new program in the Economic Vitality Element to encourage value-added agriculture in Ventura County:
  - **New Program to support Policy EV-2.2: County Planning to propose modifications to the County zoning ordinances to allow for the modernization of harvesting and packing methods to support value-added agriculture. [Source: New Program].**