



April 3, 2024

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Ventura County Planning Commission
Hall of Administration
800 S. Victoria Ave.
Ventura, CA 93009-1740

Re: Agenda Item B: Consideration to Allow and Establish Regulations for the Processing of Locally Grown Food in the Agricultural Exclusive, Open Space and Rural Agricultural Zones

Dear Chair Boydston and members of the Planning Commission,

To begin, VC CoLAB would like to thank county staff for all their work in preparing this proposed non-coastal zoning ordinance language. Staff’s efforts in reaching out to County Agricultural Commissioner Bell, members of the Agricultural Policy Advisory Committee (APAC), Farm Bureau of Ventura County and VC CoLAB while developing this language have been greatly appreciated and have not gone unnoticed. It is our belief that these collaborative efforts have resulted in a very welcome opportunity for improvement in agricultural food processing here in Ventura County. Having been in attendance of the March 13, 2024, APAC meeting, we are also pleased to see many of the concerns made by Commissioner Bell and APAC have been addressed in the latest version of the proposed non-coastal zoning ordinance language.

As stated within the provided staff report, the goal of the proposed amendments is to work with our county’s farmers and ranchers to ensure the economic sustainability of Ventura County’s agriculture industry, including, but not limited to:

- Keeping locally grown crops in the county that would otherwise be transported elsewhere to be processed,
- Creating an environment that encourages producers to grow or start growing specialty or high-value crops, including specialized animal facilities and rearing methods that can be used for local food processing,
- Increasing our local food security,
- Enhancing relationships with local agricultural producers and other businesses within the county, including restaurants, markets, hospitals, food banks, schools and more,
- Reducing the environmental impact of shipping products outside the county.

While the proposed ordinance language makes huge strides in achieving the above objectives, we feel this can be better achieved by incorporating additional flexibility within the proposed language, specifically:

County of Ventura
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- **Sec. 8107-XX.2 – General Standards**
 - **g.** Final determination of what land or parcels are unsuitable for cultivation uses should rely primarily on the determination of the Agricultural Commissioner. We suggest language be added to clarify that this standard will be based upon the Agricultural Commissioner's determination, rather than a collaboration of multiple agencies.
 - **q.** Consider incorporating the wording outlining notification requirements for non-functioning processing facilities into any approved permitting language so that future food processing operators are aware of this requirement.
- **Sec. 8107-XX.3.2 – Standards for Locally Grown Food Processing Facilities Allowed by Zoning Clearance**
 - **b.** The absolute prohibition of native vegetation removal may create a significant impediment to permitting. We strongly suggest that flexibility be added to this language that would prevent the destruction or removal of established native vegetation communities, but would rather allow for areas of single or minimal native vegetation be considered for permitting, with supporting biological surveys.
 - *Example – If an individual is looking to build a food processing facility on an area where there is an unmaintained paved lot and a sagebrush plant is growing out of a crack, they would not qualify in the way it's currently worded.*

VC CoLab would also echo the concerns made by APAC regarding the January 1, 2030 deadline for permit approval as it would preclude many projects from being developed. While we understand that the January 1, 2030 deadline is a provision of SOAR, the current timeline for permitting experienced by many growers and farmers far exceeds this five-year timeline. We urge the Planning Commission to recommend the Board of Supervisors review SOAR and remove the 2030 deadline. Alternatively, the County should establish a streamlined permitting process to ensure that food processing permit applications could be reviewed and approved within a 12-month timeframe.

VC CoLAB acknowledges the dedication of county staff towards crafting the proposed non-coastal zoning ordinance language, recognizing their commitment to the enduring prosperity of Ventura County's agriculture industry. We also appreciate staff's efforts towards creating a more sustainable local agricultural economy, but urge the Planning Commission to support CoLAB's recommendations to incorporate more clarity and flexibility into the proposed ordinance language. These recommendations would enhance the proposed ordinance effectiveness and ensure the County is supporting the evolving needs and challenges of our agricultural community. By fostering a collaborative approach, we can better safeguard the vitality and sustainability of Ventura County's agricultural landscape for generations to come.

Sincerely,



Brianne Whitcomb
Policy and Advocacy Coordinator