

Exhibit 19

FAX

TO: KARI FINLEY, PLANNING DIVISION
FAX#: 1-805-654-2509

From: Nikolai Safavi
Date: 28 July 2009

PAGES INCLUDING THIS COVER: 3

Dear Ms. Finley,

Please distribute the accompanying letter to the Board of Supervisors and the Chairman.

I am unable to attend the meeting on the 4 August, and am sending my comments in writing.

Regards,
NS

ATTENTION: Kari Finley , Planning Division

Board of Supervisors, County of Ventura
800 S. Victoria Ave, #L 1740
Ventura, CA 93009-1740

28 July 2009

Regarding: Agenda Item #33 -Approval of Sites for RHD Zoning

Via US Postal Service and Fax to: 805-654-2509

Dear Board Members and Mr. Chairman:

I am writing in reference to agenda item #33, regarding low income and farm housing, discussed during your 14 July 2009 Meeting.

I would like present several argument in favor of urgent development of farm-labor housing, and to counter points that were raised by several people during your meeting.

Your Analysis Overlooks Facts on Actual Housing Needs

Demand for housing far exceeds the 28 units needed, per your recent evaluation of inventory levels. Indeed, you will need close to 400 units, if not more. Farm housing needs to be near agricultural hubs, close to other farming communities and families, and not scattered about the county. Just because median price of housing and rents have come down in the county, the number of available inventory does not become realistic units for farm workers to rent. For instance, increased inventory in many parts of Thousand Oaks, Ventura, parts of Oxnard, etc. are not likely to be suitable for farm workers. For a farm worker in Fillmore, availability of low-rent units in Ojai does not make sense.

Lack of Public Transport Is A Bogus Argument Against Development

At least one of the members of public kept reiterating that some of the locations considered, especially Piru, do not have access to public transport. It would be great if farm workers could commute to work on the Caltrain or on buses. The reality is that public transport is effective when moving people from high-density urbanized centers, to centers of commerce. It does not work for farming communities where people need trucks, they carry equipment, and go to different locations depending on the season.

The Argument That Piru Has Crime And Graffiti Tagging Is Insulting

I am surprised that the Board stood silent in the face of the argument by one speaker that more low income and farm housing would likely produce crime and "tagging" in Piru. The biggest crimes in the US in the last two years were committed on Wall Street, not on Main Street. Piru's problem is that it is not big enough. You cannot shrink it to what it was decades ago. It has to grow to attract businesses and additional County support.

As Others Pointed Out, Process Should Be Open to OS Zoned Properties

This argument was well articulated by several speakers; I am merely echoing support.

Argument For Flood Zone Issues in Piru Lacks Merit

If the point is to produce rental properties whose rent are at levels that meet the mandate, then the amount of insurance cost for the property owner is not the business of neighbors or a matter of discussion. The property owner has to consider this risk, not the Board of Supervisors.

Be Bold -Build Real Farm Housing And Maintain High Density

You have the chance to approve projects that will build housing for farm workers. As you do this, be bold and insist on design attributes that meet the needs of farm workers. For instance:

- There should be a washing area near the parking structure/area. Farm workers often need to wash boots, cars and gear before entering their homes.
- Require lockers and changing areas be built so workers can change from work to home clothes and vice versa. Without it, they will avoid high-density facilities.
- Allow mixed use property to be developed, where ground floor units can be either residential or businesses.

Choose Locations That Are Already Farming Focused

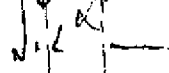
Of all the locations contemplated, as far as I know, only Piru is both very close to existing agro businesses, and already mostly agricultural. Developing Piru into a larger agricultural community will simply long-term infrastructure needs for that community.

Can't Make Everyone Happy

I wish there was a way to avoid traffic delays, waits to make left turns and still make sure young children whose parents are farm workers have access to safe and clean housing. As much as many resent that the County as developed and grown, I am sure they do not complain that their properties have increased in value many fold in the last 30 years. We simply cannot have everything, all the time, without giving up something.

I appreciate the Board considering the abovementioned facts as you deliberate which location to choose for development. I strongly urge the Board to rezone more than one location, again, because to really believe if farm workers they have access to affordable housing, you have to ask them, and not survey what is listed for rent on Cragislsit.com. That said, I have full empathy for methodology used to determine inventory.

Regards,


Nikolai Safavi

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