

county of ventura

December 11, 2012

Board of Supervisors
County of Ventura
800 South Victoria Avenue
Ventura, CA 93009

SUBJECT: Report Back to the Board of Supervisors Regarding the Acceptance and Processing of New Land Conservation Act (LCA) Contracts in 2013 and Public Hearing Regarding Approval of the Execution of Two New Agricultural LCA (10-year) Contracts; the Expansion of an Existing Agricultural Preserve (AGP); the Establishment of a New Farmland Security Zone Area (FSZA); the Designation of a New Wildlife Habitat Area; and the Execution of a New Open Space/Wildlife Habitat FSZA/LCA (20-year) Contract.

RECOMMENDED ACTIONS:

1. **MAKE** no revisions to existing LCA contracts pursuant to Assembly Bill (AB) 1265;
2. **DIRECT** the Planning Division to accept and process new LCA contracts during calendar year 2013; and,
3. **DIRECT** the Planning Division to continue to provide an annual status report on the LCA Program as part of the annual public hearing for any proposed LCA contracts.
4. **CERTIFY** that your Board reviewed and considered this Board letter and all exhibits thereto, and has considered all comments received on this matter;
5. **FIND** that entering into LCA contract 47-3.8 (Exhibit 20) and LCA contract 47-6.3 (Exhibit 21) is categorically exempt from California Environmental Quality Act (CEQA) environmental review (Title 14, California Code of Regulations, Chapter 3, § 15317);
6. **MAKE** all of the proposed findings for LCA contract 47-3.8 (Exhibit 20) and LCA contract 47-6.3 (Exhibit 21), which are set forth in this Board letter;
7. **APPROVE** and **EXECUTE** LCA contract 47-3.8 (Exhibit 20) and LCA contract 47-6.3 (Exhibit 21);



8. **DIRECT** the County Clerk/Recorder to record LCA contract 47-3.8 (Exhibit 20) and LCA contract 47-6.3 (Exhibit 21), after the owner of the subject properties and the Chair of the Board have executed the contracts;
9. **FIND** that the expansion of existing AGP 3-10 as depicted in Exhibit 2, the establishment of proposed FSZA 3-10:1 as depicted in Exhibit 3, and entering into FSZA/LCA contract 3-10:1.1 (Exhibit 22) are categorically exempt from CEQA environmental review (Title 14, California Code of Regulations, Chapter 3, § 15317);
10. **MAKE** all of the proposed findings for FSZA/LCA contract 3-10:1.1 (Exhibit 22), which are set forth in Sections D, E, and F of the Planning Commission staff report (Exhibit 1);
11. **EXPAND** existing AGP 3-10 (Exhibit 2) to accommodate proposed FSZA/LCA contract 3-10:1.1 (Exhibit 22), as discussed in Section D of the Planning Commission staff report (Exhibit 1);
12. **DESIGNATE** a Wildlife Habitat Area (Exhibit 6) for proposed FSZA/LCA contract 3-10:1.1 (Exhibit 22), as discussed in Section E of the Planning Commission staff report (Exhibit 1);
13. **ESTABLISH** proposed FSZA 3-10:1 (Exhibit 3) to accommodate proposed FSZA/LCA contract 3-10:1.1 (Exhibit 22), as discussed in Section F of the Planning Commission staff report (Exhibit 1);
14. **APPROVE** and **EXECUTE** proposed FSZA/LCA contract 3-10:1.1 (Exhibit 22), as described in Section A.8 of the Planning Commission staff report (Exhibit 1);
15. **DIRECT** the County Clerk/Recorder to record proposed FSZA/LCA contract 3-10:1.1 (Exhibit 22), after the owner of the subject property and the Chair of the Board have executed the contract; and,
16. **SPECIFY** that the Clerk of the Board is the custodian, and 800 S. Victoria Avenue, Ventura, CA 93009 is the location, of the documents and materials that constitute the record of proceedings upon which this decision is based.

FISCAL/MANDATES IMPACT:

Mandated:

In return for an agreement to restrict and limit the use of the property to agriculture, open space, or compatible land uses for the duration of the LCA or FSZA/LCA contracts, the LCA-contracted land is assessed under a different methodology which typically results in a lower annual property tax obligation by contract-holding landowners. The Open Space Subvention Act (1971) provides for partial reimbursement by the State to jurisdictions participating in the Williamson Act program for the lost property tax revenue. However, the State has provided no meaningful

reimbursement since 2010. Therefore, approval of the contracts as recommended will result in a net loss of property tax revenue to the County General Fund of approximately \$3,500.

Authority:

The Board-approved LCA Program (since 1969) and the California LCA of 1965 (the Williamson Act) as amended.

Source of Revenue:

The LCA Program affects the General Fund. There is a reduction in property tax revenues to the County based on the property being limited to agriculture, open space, or compatible land uses for the duration of LCA and FSZA/LCA contracts.

Various specific factors affect the assessed value of property under LCA contract (e.g., tax rate area, acreage, when the property was acquired, the commodities grown on the property, agricultural improvements such as irrigation lines and wind machines). Therefore, preparation of a detailed estimate of the property tax loss associated with approximately 1,000 contracts (10- and 20-year contracts and nonrenewals) currently in the County LCA Program, and the approximately 254 acres proposed this year for new LCA contracts, is complex and time-consuming. However, the County Assessor's Office prepared an estimate in 2009 that concluded the assessed value differential as a result of the LCA program is approximately \$607.7 million. Generally, taxes are about one percent (1%) of assessed value (\$6 million), and roughly 25% of that amount, in this instance \$1.5 million, would be directed to the County General Fund. The Assessor reports that the 2009 study is still reliable for general information, as there were only minor changes to the determinative factors in 2012.

The Assessor's Office also prepares the annual LCA Open Space Subvention Act Application that is used to determine eligibility for State subvention payments based on a formula that considers site-specific characteristics (e.g., land use, soils types, and acreage). Submitted with this letter is the Assessor's summary of the 2012-2013 Fiscal Year Open Space Subvention Act Application (enrollment as of the January 1, 2012 lien date) that indicates that if it were to make payments this year, the State's payment to Ventura County would be \$332,889.44 (Exhibit 18). For the 2009-2010 fiscal year, the State made no subvention payment as the funding was reduced to \$1,000 for the entire State, effectively eliminating the payment. For the 2010-2011 and 2011-2012 fiscal years, the State made no subvention payment, and the County expects no reimbursement for 2012-2013.

Impact on Other Agencies:

The recommended actions have no significant impact on other agencies. However, general administration of the LCA Program has an incremental impact on County Counsel for legal and administrative services involving review and execution of new contracts and the preparation of the annual Open Space Subvention Act Application.

The Assessor's Office estimates its annual costs for its role in administering the contracts to be approximately \$345,000. Staff time is also expended by the Agricultural Commissioner's Office to guide the County Agricultural Policy Advisory Committee (APAC) in the review of the contract proposals. Finally, while costs associated with work on specific contracts is paid by the benefitting property owners, general program administration by the Planning Division is a net County cost within the Planning Division budget.

DISCUSSION:

LCA Program Administration:

The purpose and intent of the Ventura County LCA Program is to preserve agricultural and open space (wildlife habitat) lands, as described in the County LCA Guidelines (November 2011, p. 1).

The LCA (also known as the Williamson Act) was adopted by the State Legislature in 1965 and has been implemented in Ventura County since 1969. Under LCA contracts, property owners agree to keep their land in agricultural production, grazing or open space (wildlife habitat) for a period of 10 or 20 years in exchange for a statutory percentage reduction in the taxable value of the property, depending on the time frame of the contract (20 to 30 percent maximum for prime land and 10 percent maximum for non-prime land under a 10-year agricultural or open space contract, and 35 percent maximum for prime land under a 20-year contract). A general map depicting land under LCA contract in unincorporated Ventura County is shown in Exhibit 17.

In November 2011, your Board revised the LCA Guidelines, which eliminated the required Planning Commission review of agricultural LCA contracts and FSZA/LCA contracts. This change removed one of the steps for processing agricultural LCA and FSZA/LCA contracts. The Agricultural Policy Advisory Committee (APAC) will continue to review and make recommendations to your Board on all proposed agricultural contracts. Proposed Open Space/Wildlife Habitat LCA and LCA/FSZA contracts will continue to be brought before the Planning Commission for consideration prior to being heard by your Board. The current LCA Guidelines (November 2011) are available for public review on the Planning Division's website at www.ventura.org/planning.

Historically, the State had provided subvention funding, or partial reimbursement, for lost property taxes resulting from property values assessed under the LCA. However, in October 2009, then-Governor Schwarzenegger effectively eliminated the subvention funding. This action resulted in an approximately \$300,000 reduction in anticipated general fund revenues for the County in Fiscal Year (FY) 2009-2010. Following the Governor's action, the Board directed that staff return prior to the start of the 2010 LCA contract application cycle with an analysis of the LCA program and a recommendation regarding the continuation of the program. In January 2010 the Board considered the matter and directed that the County continue to administer the LCA program with no changes. In addition, the Board directed staff to return each year prior to the regular contract cycle with a report and analysis of the program for your consideration.

In 2010, Senate Bill (SB) 863 established a new, voluntary local-option program to temporarily reduce the length of the LCA contract and correspondingly reduce the associated property tax benefit enjoyed by the property owner. Your Board opted in December 2010 not to pursue the local option contract revisions.

As part of the continued state budget negotiations in 2011, the partial subvention funding and the local option LCA contract revisions previously authorized under SB 863 were eliminated. Assembly Bill (AB) 1265 was introduced and passed to partially reverse the effects of SB 863 through the budget process. AB 1265 did not reinstate any of the lost subvention funding, however it did revive the local option LCA funding program, which was estimated to result in an approximately \$500,000 increase in County general funds if implemented. The Board considered the local option program in 2011 and, because of the resulting significant financial impact on the local agricultural industry, elected again to not pursue it for Ventura County.

Since 2011, there have been no new legislative efforts to significantly alter the LCA program in California. As the local option program remains in the same form as it was in 2011, staff recommends again this year that the Board take no action to implement the local option program authorized under AB 1265. Further, the Planning Division recommends that the Board direct staff to accept and process LCA contract applications in 2013 using the currently adopted LCA Guidelines.

2012 Contract Proposals:

A map showing the locations of the properties that are the subject of the 2012 proposals is included as Exhibit 7, and the proposed contracts are attached as Exhibits 20 through 22. If your Board approves the proposed contracts and actions and all approved contracts are recorded, there would be a gain of approximately 254 acres of LCA contracted land, countywide. By comparison, the number of acres of contracted land increased by 30, 44, and 130 in 2009, 2010, and 2011, respectively. The 2012 contract actions under consideration by your Board include the following:

1. Contract No. 47-3.8, Marathon Land, Inc.:
 - a. Request: The applicant requests approval and execution of LCA Contract No. 47-3.8 (PL12-0070), which consists of a new 10-year agricultural LCA contract.
 - b. Applicant/Property Owner: Jurgen Gramckow, President, Marathon Land, Inc., P.O. Box 579, Port Hueneme, CA 93044
 - c. Decision-Making Authority: Pursuant to the Ventura County LCA Guidelines [§ VII.B.2(d)], the Board of Supervisors shall hold a hearing and “make a final decision to approve, partially approve, or deny each individual Contract and associated AGP or FSZA boundary changes and, if applicable, the designation of a wildlife habitat area.” The Agricultural Policy Advisory

Committee (APAC) is the recommending body to the Board regarding the proposed agricultural contract [LCA Guidelines § VII.B.2(a)].

- d. Project Site Location and Parcel Number: The approximately 64-acre subject property is located immediately northwest of the intersection of Highway 1 and Hueneme Road, in the community of Oxnard, in the unincorporated area of Ventura County. The Tax Assessor's parcel numbers for the parcels that constitute the project site are 218-0-091-150 and 218-0-092-090.
- e. Project Site Land Use and Zoning Designations:
 - 1) Countywide General Plan Land Use Map Designations: Agricultural
 - 2) Zoning Designation: AE-40 ac (Agricultural Exclusive, 40 acre minimum parcel size)
 - 3) Land Use: Strawberries
- f. Adjacent LCA Contracts, General Plan Land Use Map Designations, Zoning, and Land Uses/Development:

Location in Relation to the Project Site	Existing LCA Contracts	General Plan Land Use Map Designation	Zoning	Land Uses/Development
North	N/A	Agricultural	AE-40 ac	Strawberries
East	N/A	Agricultural	AE-40 ac	Flowers
South	N/A	State or Federal Facility	AE-40 ac	Point Mugu Naval Base
West	N/A	Agricultural	AE-40 ac	Greenhouses and Packing House

- g. Project Description: The Applicant proposes approval and execution of a new, 10-year agricultural LCA contract (Exhibit 20), within existing AGP No. 47-3, on an approximately 64-acre property. An aerial photograph of the site is attached as Exhibit 13. Approximately 63 acres (97%) of the property are in crop production. The boundaries of the contract are proposed to coincide with the configuration of the parcel.
2. Contract No. 47-6.3, Marathon Land, Inc.:
- a. Request: The applicant requests approval and execution of LCA Contract No. 47-6.3 (PL12-0070), which consists of a new 10-year agricultural LCA contract.
 - b. Applicant/Property Owner: Jurgen Gramckow, President, Marathon Land, Inc., P.O. Box 579, Port Hueneme, CA 93044

- c. **Decision-Making Authority:** Pursuant to the Ventura County LCA Guidelines [§ VIII.B.2(d)], the Board of Supervisors shall hold a hearing and “make a final decision to approve, partially approve, or deny each individual Contract and associated AGP or FSZA boundary changes and, if applicable, the designation of a wildlife habitat area.” The APAC is the recommending body to the Board regarding the proposed agricultural contract [LCA Guidelines § VIII.B.2(a)].
- d. **Project Site Location and Parcel Number:** The approximately 79-acre subject property is located at the southern intersection of Highway 1 and Rice Avenue, in the community of Oxnard, in the unincorporated area of Ventura County, immediately south of the City of Oxnard corporate boundary. The Tax Assessor’s parcel number for the parcel that constitutes the project site is 232-0-010-090.
- e. **Project Site Land Use and Zoning Designations:**
- 1) Countywide General Plan Land Use Map Designations: Agricultural
 - 2) Zoning Designation: AE-40 ac (Agricultural Exclusive, 40 acre minimum parcel size)
 - 3) Land Use: Strawberries
- f. **Adjacent LCA Contracts, General Plan Land Use Map Designations, Zoning, and Land Uses/Development:**

Location in Relation to the Project Site	Existing LCA Contracts	General Plan Land Use Map Designation	Zoning	Land Uses/Development
North	N/A	City of Oxnard	City of Oxnard	Strawberries and Highway 1
East	47-6.1	Agricultural	AE-40 ac	Vegetables
South	N/A	Agricultural	AE-40 ac	Sod and Vegetables
West	N/A	Agricultural	AE-40 ac	Strawberries

- g. **Project Description:** The Applicant proposes approval and execution of a new, 10-year agricultural LCA contract (Exhibit 21), within existing AGP No. 47-6, on an approximately 79-acre property. An aerial photograph of the site is attached as Exhibit 15. Approximately 75 acres (95%) of the property are in crop production. The boundaries of the contract are proposed to coincide with the configuration of the parcel.
3. Contract No. 3-10:1.1, The Nature Conservancy:
- a. **Request:** The applicant requests approval and execution of LCA Contract No. 3-10:1.1 (PL12-0071), which consists of:
- An expansion of an existing AGP;

- The establishment of a new FSZA; and,
 - The execution of a new 20-year open space/wildlife habitat FSZA/LCA contract.
- b. Applicant/Property Owner: E.J. Remson, Senior Program Manager, The Nature Conservancy, 532 E. Main Street, Suite 200, Ventura, CA 93001
- c. Decision-Making Authority: Pursuant to the Ventura County LCA Guidelines [§ VII.B.2(d)], the Board of Supervisors shall hold a hearing and “make a final decision to approve, partially approve, or deny each individual Contract and associated AGP or FSZA boundary changes and, if applicable, the designation of a wildlife habitat area.” The Planning Commission is the recommending body to the Board regarding the proposed open space/wildlife habitat contract [LCA Guidelines § VII.B.2(c)].
- d. Project Site Location and Parcel Number: The approximately 111-acre subject property is located at 2525 Bardsdale Avenue, approximately ½ mile northeast of the intersection of Bardsdale Avenue and San Cayetano Street, in the community of Fillmore, in the unincorporated area of Ventura County. The Tax Assessor’s parcel numbers for the parcels that constitute the project site are 046-0-160-390 and 046-0-160-400.
- e. Project Site Land Use and Zoning Designations:
- 1) Countywide General Plan Land Use Map Designations: Agricultural and Open Space
 - 2) Zoning Designation: OS-80 ac/MRP (Open Space, 80 acre minimum parcel size/Mineral Resource Protection Overlay Zone) and AE-40 ac/MRP (Agricultural Exclusive, 40 acre minimum parcel size/Mineral Resource Protection Overlay Zone)
 - 3) Land Use: Natural open space (Santa Clara River) and row crops
- f. Adjacent LCA Contracts, General Plan Land Use Map Designations, Zoning, and Land Uses/Development:

Location in Relation to the Project Site	Existing LCA Contracts	General Plan Land Use Map Designation	Zoning	Land Uses/Development
North	3-11.2	Open Space	OS-80 ac/MRP and AE-40 ac/MRP	Row crops
East	3-18.2 and 3-18.19	Open Space and Agricultural	AE-40 ac/MRP and AE-40 ac	Santa Clara River and citrus orchard
South	3-10.2	Open Space and Agricultural	OS-80 ac/MRP and AE-40 ac/MRP	Row crops
West	N/A	Open Space	OS-80 ac/MRP	Santa Clara River

- g. **Project Description:** The portion of the property designated as Open Space is entirely within the Santa Clara River. The portion of the property designated as Agricultural is currently being used for the cultivation of row crops, and is proposed to be phased out for the eventual reversion to natural open space. The Applicant proposes the expansion of an existing AGP (Exhibit 2), the establishment of a new FSZA (Exhibit 3), and a new 20-year open space/wildlife habitat FSZA/LCA contract (Exhibit 22). An aerial photograph of the site is attached as Exhibit 5. Additionally, as described in Section E of the Planning Commission Staff Report (Exhibit 1), the Board must designate the subject property as a Wildlife Habitat Area, as shown in Exhibit 6. The boundaries of the contract are proposed to coincide with the configuration of the parcel.

The 2012 contract proposals would be consistent with the State Williamson Act (Government Code Section 51200, et seq.) and the Ventura County LCA Guidelines (July 2012), as discussed in Sections D through F of the Planning Commission Staff Report (for open space/wildlife habitat contracts) (Exhibit 1), and in the Agricultural Findings, Evidence, and Environmental Review (for agricultural contracts) (Exhibit 16).

In addition, no Notices of Nonrenewal for Entire Contracts (ENNRs) were timely filed and therefore none will be recorded in 2012. County records indicate that non-renewed contracts will reduce the total amount of contracted land in the County to approximately 126,000 acres over the next nine years. About 254 acres of land is being added to the County's total contracted acreage this year, and approximately 865 acres will come out of contract on December 31, 2012. A map of contracts to expire within the next nine years is provided in Exhibit 10.

APAC Review and Recommendation

APAC met on October 10, 2012, to consider proposed agricultural LCA contracts 47-3.8 and 47-6.3. On a vote of 4-0, APAC recommended approval of each of the proposed contracts.

Planning Commission Public Hearing

On November 1, 2012, the Planning Commission met and considered the proposed AGP expansion, FSZA establishment, and open space/wildlife habitat Contract No. 3-10:1.1. Two members of the public provided testimony at the Planning Commission hearing with regard to the proposed Open Space/Wildlife Habitat contract and its associated components.

Robert Morris was supportive of the property's inclusion in the LCA program. However, he was also concerned that the Wildlife Habitat Area designation would result in the introduction of wildlife that would encroach into his neighboring citrus orchard to the east of the subject property, and that the Wildlife Habitat Area designation would ultimately lead to restrictions on the agricultural use of his property. Furthermore, Mr.

Morris was concerned that the potential loss of an existing levee along the Santa Clara River as part of The Nature Conservancy's restoration efforts would have detrimental effects on his neighboring farming operation. Planning staff explained that the proposed contract and associated designation of a Wildlife Habitat Area would not create the potential for The Nature Conservancy to use or alter the property in a manner that is not currently allowed on the property (without the proposed contract and associated designation of a Wildlife Habitat Area), pursuant to the Non-Coastal Zoning Ordinance. The designation of the Wildlife Habitat Area will have no effect on the permits and/or approvals that are required from other agencies holding jurisdiction over activities in and adjacent to the river, in order to develop the property.

Additionally, Lynn Jensen, representing the Ventura County Coalition of Labor, Agriculture, and Business (COLAB), expressed that she was "not opposed" to the proposed contract. She also expressed, however, her concern that the proposal would directly result in the loss of agricultural land. She stated that pursuant to the Ventura County LCA Guidelines, the Open Space/Wildlife Habitat contract option is intended for the protection of open space and biological resources, not for the conversion of agricultural land into natural open space. Ms. Jensen also stated that she believes APAC should have the opportunity to comment on Open Space/Wildlife Habitat contract proposals that involve the removal of agriculture. Planning Staff responded that pursuant to the LCA Guidelines, Open Space/Wildlife Habitat contracts may be approved on land that has been determined to be capable of being restored to contain significant biological resources. The LCA Guidelines make no value judgment as to the potential competing interests of agriculture and open space, and a discussion of whether the Guidelines should be updated to reflect a preference for agricultural resources is an issue that the Board of Supervisors may choose to explore as a matter of policy.

By a vote of 4-0 (Commissioner Onstot absent), the Planning Commission recommended that your Board make the proposed findings and take the recommended actions to approve and execute proposed Contract No. 3-10:1.1, as listed in Planning Commission Resolution No. R-12-18 (Exhibit 19).

PUBLIC AND JURISDICTIONAL REVIEW:

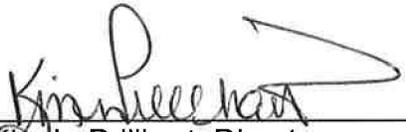
The Planning Division mailed notification of this hearing to property owners within 300 feet of the boundaries of each proposed contract, interested parties, and the Planning Directors of those cities located within one mile of a proposed contract. The proposals were also published in the *Ventura County Star* (countywide circulation).

The Local Agency Formation Commission (LAFCo) was notified of all contract proposals.

To date, the Planning Division has received four comments related to the Open Space/Wildlife Habitat Contract proposed by The Nature Conservancy (Exhibits A, 23, 24, and 25). The issues raised in those comments are discussed above under

“Planning Commission Public Hearing.” Any comments subsequently submitted will be presented to your Board at the public hearing on December 11, 2012.

This Board Letter has been reviewed by the County Executive Office, Assessor’s Office, Auditor Controller’s Office, and County Counsel. Questions concerning this Board Letter should be directed to Andrea Ozdy, LCA Program Planner, at andrea.ozdy@ventura.org or (805) 654-2453, or to Daniel Klemann, Residential Permits Section Manager, at daniel.klemann@ventura.org or (805) 654-3588.



Kim L. Prillhart, Director
Ventura County Planning Division

Attachments:

Exhibits For Planning Commission Hearing on November 1, 2012:

- Exhibit 1 – Planning Commission Staff Report (November 1, 2012)
- Exhibit 2 – Map of Proposed Expansion of AGP 3-10 (The Nature Conservancy)
- Exhibit 3 – Map of Proposed Establishment of FSZA 3-10:1 (The Nature Conservancy)
- Exhibit 4 – Map of Proposed FSZA/LCA Contract 3-10:1.1 (The Nature Conservancy)
- Exhibit 5 – Aerial Photograph of Proposed FSZA/LCA Contract No. 3-10:1.1 (The Nature Conservancy)
- Exhibit 6 – Map of Proposed Wildlife Habitat Area (The Nature Conservancy)
- Exhibit 7 – Map of 2012 Contract Proposals
- Exhibit 8 – Memo from Christina Danko to Andrea Ozdy regarding PL12-0071 (September 11, 2012)
- Exhibit 9 – Letter from Edmund Pert to Andrea Ozdy regarding PL12-0071 (September 5, 2012)
- Exhibit 10 – Map of Contracts in Non-Renewal Period
- Exhibit 11 – Planning Commission Powerpoint Presentation

Additional Exhibit Submitted For Planning Commission Hearing on November 1, 2012:

- Exhibit A – E-mail from Robert Morris to Andrea Ozdy (October 30, 2012)

Additional Exhibits For Board of Supervisors Hearing on December 11, 2012:

- Exhibit 12 – Map of Proposed LCA Contract No. 47-3.8 (Marathon Land, Inc.)
- Exhibit 13 – Aerial Photograph of Proposed LCA Contract No. 47-3.8 (Marathon Land, Inc.)
- Exhibit 14 – Map of Proposed LCA Contract No. 47-6.3 (Marathon Land, Inc.)
- Exhibit 15 – Aerial Photograph of Proposed LCA Contract No. 47-6.3 (Marathon Land, Inc.)
- Exhibit 16 – Agricultural Findings, Evidence, and Environmental Review
- Exhibit 17 – Map Identifying LCA Contracts Within Unincorporated Ventura County
- Exhibit 18 – 2012 Subvention Report
- Exhibit 19 – Planning Commission Resolution No. R-12-18
- Exhibit 20 – Proposed LCA Contract No. 47-3.8 (Marathon Land, Inc.) – PL12-0070
- Exhibit 21 – Proposed LCA Contract No. 47-6.3 (Marathon Land, Inc.) – PL12-0070
- Exhibit 22 – Proposed FSZA/LCA Contract No. 3-10:1.1 (The Nature Conservancy) – PL12-0071
- Exhibit 23 – E-mail from Robert Morris to Andrea Ozdy (November 2, 2012)
- Exhibit 24 – E-mail from Nancy Lesperance to Andrea Ozdy (November 7, 2012)
- Exhibit 25 – Letter from Ed McFadden to Andrea Ozdy (November 9, 2012)