

Planning Commission Staff Report – Hearing on November 1, 2012

County of Ventura · Resource Management Agency · Planning Division 800 S. Victoria Avenue, Ventura, CA 93009-1740 · (805) 654-2478 · ventura.org/rma/planning

A. PROJECT INFORMATION

- **1. Request**: The applicant requests approval of PL12-0071, which consists of the approval of:
 - The expansion of an existing Agricultural Preserve (AGP);
 - The establishment of a new Farmland Security Zone Area (FSZA); and
 - The execution of a new 20-year open space/wildlife habitat FSZA/Land Conservation Act (LCA) contract.
- **2.** Applicant/Property Owner: E.J. Remson, Senior Program Manager, The Nature Conservancy, 532 E. Main Street, Suite 200, Ventura, CA 93001
- 3. Decision-Making Authority: Pursuant to the Ventura County Land Conservation Act Guidelines [§ VIII.B.2(c)], the Planning Commission shall hold a hearing and "make a recommendation to the Board of Supervisors to approve, partially approve, or deny each individual Contract and associated AGP or FSZA boundary changes." The Board is the decision-making authority for the proposed contract.
- 4. Project Site Location and Parcel Number: The project site 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.
- 5. Project Site Land Use and Zoning Designations:
 - a. <u>Countywide General Plan Land Use Map Designations</u>: Agricultural and Open Space
 - b. <u>Zoning Designation</u>: 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)

6. Adjacent Zoning and Land Uses/Development:

Location in Relation to the Project Site	Zoning	Land Uses/Development
North	OS-80 ac/MRP and AE-40 ac/MRP	Row crops
East	AE-40 ac/MRP and AE-40 ac	Santa Clara River and row crops
South	OS-80 ac/MRP and AE-40 ac/MRP	Row crops
West	OS-80 ac/MRP	Santa Clara River

- 7. **History:** The property was previously developed with a residence, however the property is currently not developed with any structures.
- The subject property is located at 2525 Bardsdale Project Description: 8, Avenue, in the Fillmore area of unincorporated Ventura County, and is approximately 111 acres in size. The proposed contract area consists of land designated as Agricultural and Open Space in the General Plan. 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 Agricultural Preserve (AGP) (Exhibit 2), the establishment of a new Farmland Security Zone Area (FSZA) (Exhibit 3), and a new 20-year open space/wildlife habitat FSZA/LCA contract (Exhibit 4). An aerial photograph of the site is attached as Exhibit 5. Additionally, as described below in Section E. the Board must designate the subject property as a Wildlife Habitat Area, as shown in Exhibit 6.
- **9.** Additional Information: For your information, a map of all the 2012 proposed contracts (including proposed agricultural contracts that are not the subject of this staff report but will be considered by the Board) is included as Exhibit 7.

B. LCA PROGRAM BACKGROUND

1. LCA (Williamson Act)

The State Legislature adopted the LCA (Williamson Act) in 1965 (State Government Code Section 51200 et seq.). The Williamson Act includes provisions for agricultural and open space contracts.

In 1969, the Ventura County Board of Supervisors (Board) established the Ventura County LCA Program for unincorporated Ventura County. The Board also adopted LCA Guidelines which are the County's rules regarding administration of the LCA Program. In 1999, the Board adopted a resolution and revised the LCA Guidelines to clarify some sections and incorporate several Government Code changes (Government Code Section 51200 et seq.), including provisions for the establishment of FSZAs within established AGPs and the execution of 20-year FSZA/LCA contracts. In December 2000, the Board again revised the LCA Guidelines to incorporate Government Code changes, including provisions to facilitate lot line adjustments and the exchange of agricultural land (Government Code Section 51200 et seq.). The revisions to the LCA Guidelines in December 2000 also included changes to reflect other applicable Government Code sections and associated laws and regulations.

In July 2006, the Board of Supervisors revised the LCA Guidelines to include a definitions section, establish 9 acres as the minimum parcel size eligible for an

agricultural production (not grazing) contract, incorporate contract eligibility criteria for nursery/greenhouse operations, and allow open space contracts to preserve wildlife habitat areas.

As stated in the LCA Guidelines (p. 1), the purpose of the County LCA Program is to:

- Help preserve the limited and diminishing supply of agricultural land in the County through agricultural LCA contracts;
- Encourage production of food, fiber, and ornamental crops and commodities for local, regional, state, national, and international markets;
- Discourage premature conversion of agricultural land to nonagricultural land uses;
- Help sustain and promote the County's commercial agricultural industry and the direct, indirect, and imputed effect on the Countywide and State economy;
- Allow and define compatible uses within agricultural contracts that do not hinder or compromise the existing or potential agricultural productivity of agricultural land;
- Help preserve wildlife habitat areas through open space (wildlife habitat) LCA contracts; and,
- Allow compatible uses within open space LCA contracts that do not adversely affect the preservation of wildlife habitat areas.

Generally, the purpose of the LCA Program is to preserve agricultural and open space (wildlife habitat) lands. This is accomplished through an agreement (i.e., a LCA contract) wherein a property owner agrees to keep a certain percentage of land in agricultural production, grazing, or wildlife habitat as set forth in the Guidelines, in exchange for a statutory percentage reduction in the taxable value of the property under contract depending on various factors, including the length of time (10 or 20 years) the owner has agreed to keep the land in these uses. Consistent with the provisions of the State Government Code, County LCA Guidelines, and the LCA contracts themselves, all LCA and FSZA/LCA contracts automatically renew each year on their anniversary date. Therefore, unless another action is taken, such as the recordation of a Notice of Non-Renewal or cancellation, an LCA or FSZA/LCA contract remains in full force and effect.

The Williamson Act and County LCA Guidelines give the Board the authority to: (1) establish and expand AGPs and FSZAs within AGPs; and, (2) enter into LCA contracts and FSZA/LCA contracts with landowners of eligible agricultural and open space properties located in unincorporated Ventura County.

In November 2011, the Board of Supervisors revised the LCA Guidelines once again. In addition to several minor changes and updates, the Board 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 Board will continue to rely on the Agricultural Policy Advisory Committee (APAC) to review and make recommendations on all proposed agricultural contracts. Future Open Space/Wildlife Habitat LCA and LCA/FSZA contracts will continue to be brought before the Planning Commission for consideration. The current LCA Guidelines (November 2011) are available for public review on the Planning Division's website at www.ventura.org/planning.

2. Subvention Rates for Land Under LCA or FSZA/LCA Contracts

Historically, the State has annually reimbursed the County for a portion of lost property tax revenues. State reimbursement for LCA property taxes were deposited into the County's General Fund. (See also the Open Space Subvention Act, Government Code Sections 16140-16154.) Although the County does not expect subvention payments for the 2012-2013 Fiscal Year due to the State's budget cuts that included elimination of subvention payments, the Assessor's Office still intends to file an Open Space Subvention Act Application.

The current subvention rate is \$1.00/acre for open space/non-prime land, \$5.00/acre for prime agricultural land for all 10-year contracts and 20-year contracts located outside of the 3-mile radius of the Sphere of Influence of a city, and \$8.00/acre for 20-year contracts located within the 3-mile radius of the Sphere of Influence of a city. The availability of the annual Subvention Report is discussed in Section H of this staff report (below).

If the landowner files a Notice of Non-Renewal for all or a portion of an LCA or FSZA/LCA contract, the percentage of property tax reduction decreases for the duration of the non-renewal period (9 years for LCA contracts and 19 years for FSZA/LCA contracts) until it reaches appropriate, current, non-LCA property tax levels. The County becomes ineligible to receive subvention revenues from the State for a contract upon the effective date of a Notice of Non-Renewal.

3. Review of Proposed LCA Contracts

Owners of eligible agricultural or open space properties located in unincorporated Ventura County may request to enter into a contract with the County to restrict the use of their land to long-term commercial agricultural production, grazing, or wildlife habitat preservation. Other limited land uses on the contracted property not directly related to agricultural production are allowed if they qualify as compatible uses in the LCA Guidelines and state law and are authorized by the County General Plan (including the Area Plans) and the Ventura County Coastal Zoning Ordinance or Ventura County Non-Coastal Zoning Ordinance.

Planning Division staff refers to the Ventura County APAC for review of all proposals for new agricultural LCA and FSZA/LCA contracts, AGP and FSZA establishment/expansions or disestablishments, contract rescission/re-entries, non-renewals of portions of contracts, and contract cancellations involving

properties in agricultural production or grazing. The APAC, as part of its advisory function, makes recommendations to the Board for approval or denial of agricultural LCA proposals, and may do so for other discretionary projects, such as land divisions, proposed on LCA-contracted land. Likewise, the Planning Commission, as part of its advisory function, makes recommendations to the Board for approval or denial of open space/wildlife habitat LCA proposals.

The Board makes the final decision on the approval or denial of proposed AGP or FSZA changes, new LCA and FSZA/LCA contracts, rescission/re-entries, non-renewals for portions of contracts, and cancellations. The Board also is required under the Williamson Act and the County LCA Guidelines to make specific findings for Parcel Map Waivers/Lot Line Adjustments that involve LCA or FSZA/LCA contracts.

In order to be effective on January 1, 2013, the 2012 Board-approved LCA contract proposal must be recorded prior to, or on, December 31, 2012.

C. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) COMPLIANCE

Pursuant to CEQA (Public Resources Code § 21000 et seq.) and the CEQA Guidelines (Title 14, California Code or Regulations, Division 6, Chapter 3, § 15000 et seq.), the subject application is a "project" that is subject to environmental review.

The State Legislature through the Secretary for Resources has found that certain classes of projects are exempt from CEQA environmental impact review because they do not have a significant effect on the environment. These projects are declared to be Categorically Exempt from the requirement for the preparation of environmental impact documents. The proposed expansion of an existing AGP, as well as the establishment of a new FSZA and FSZA/LCA contract, are categorically exempt from CEQA environmental review (Title 14, California Code of Regulations, Chapter 3, § 15317 "Open Space Contracts or Easements").

Therefore, this project is Categorically Exempt pursuant to § 15317 of the CEQA Guidelines.

D. FINDINGS FOR DESIGNATION OF LAND AS AGPs

PL12-0071 must meet the following requirements of the Ventura County LCA Guidelines (p. 6) to qualify for the expansion of an existing AGP:

a. If a property owner wishes to enter into a Contract, and the property is not within the boundaries of a previously established AGP, the owner must request the Board to expand the AGP or establish a new AGP simultaneously with the approval of the Contract (LCA Guidelines, p. 12). As part of the contract request, the applicant proposes the expansion of existing AGP 3-10.

Therefore, the property that is the subject of the proposed LCA contract meets this eligibility requirement of the County LCA Guidelines.

b. Government Code Section 51230 requires that an AGP consist of no less than 100 acres, unless the Board determines that the unique characteristics of the agricultural operations in the area call for smaller preserves, and that the establishment of the preserve is consistent with the General Plan.

AGP 3-10 currently consists of approximately 505 acres. The applicant proposes the expansion of the existing AGP into land designated by the General Plan as Open Space (i.e., the portion of the property that lies within the Santa Clara River). With the expansion of approximately 70 acres to the existing AGP, AGP 3-10 will be approximately 575 acres.

Therefore, the property that is the subject of the proposed LCA contract meets this eligibility requirement of the County LCA Guidelines.

Based on the evaluation above, PL12-0071 complies with the eligibility standards required in the LCA Guidelines for the designation of land as an AGP.

E. COMPLIANCE WITH COUNTY LCA GUIDELINES ELIGIBILITY CRITERIA FOR OPEN SPACE/WILDLIFE HABITAT CONTRACT

PL12-0071 must meet the following open space eligibility requirements of the Ventura County LCA Guidelines (pp. 11-14) to qualify for an Open Space/Wildlife Habitat Area:

a. The Subject Property must be designated Open Space or Agricultural in the General Plan. Additionally, it must be located within an AGP (LCA Guidelines, p. 12).

The proposed contract area consists of land designated as "Agricultural" and "Open Space" in the General Plan. The portion of the property that has an "Agricultural" General Plan land use designation is within AGP 3-10. As stated above in Section D, AGP 3-10 is proposed to be expanded to accommodate the contract on the portion of the property that has an "Open Space" General Plan land use designation.

Therefore, the property that is the subject of the proposed LCA contract meets this eligibility requirement of the County LCA Guidelines.

b. The Subject Property must either have, or be capable of being restored to have, significant biological resources which include, but are not limited to, the following: 1. Habitats of endangered, threatened or rare species; 2. Wetland Habitats; 3. Coastal Habitats; 4. Migration corridors for fish or wildlife; 5. Locally important species/communities (LCA Guidelines, p. 12).

The subject property is located within and immediately south of the Santa Clara River and contains biological resources including riparian In a memorandum from Christina Danko, the Planning Division staff biologist, to Andrea Ozdy, dated September 11, 2012, Ms. Danko states that: "The Santa Clara River is the largest river system in southern California that remains mostly in its natural, undeveloped state. The river supports sensitive natural communities including southern riparian scrub. The following rare, threatened, and endangered species have been observed and documented within the section of river that flows adjacent to these properties: southern California steelhead trout, a federally listed endangered fish; Santa Ana sucker, a federally listed threatened fish; least Bell's vireo, a state and federally listed endangered bird; bank swallow, a state listed threatened bird; southwestern willow flycatcher, a state and federally listed endangered bird; unarmored threespine stickleback, a state and federally listed endangered fish; and western pond turtle, a California Species of Special Concern. The Santa Clara River is identified by the US Fish and Wildlife Service as Critical Habitat for the endangered southern California steelhead trout" (Exhibit 8).

Therefore, the property that is the subject of the proposed LCA contract meets this eligibility requirement of the County LCA Guidelines.

c. The Contract Area size requirement for OS/LCA Contracts is different than for LCA Contracts, since there is no need for an area large enough to be an economically feasible commercial agricultural operation. The viability of wildlife habitats is affected by the nature of the habitat—in some circumstances, very small areas can provide valuable habitat—and by the presence of adjacent open space areas whether or not that land is under the same ownership. Therefore, unlike LCA Contracts where the Contract Area is coterminous with parcel boundaries, the Contract Area of an OS/LCA contract may be a portion of one parcel. For these reasons, the minimum Contract Area

¹ California Department of Fish and Game. September 2012. California Natural Diversity Database.

for OS/LCA Contracts shall be determined on a case-by-case basis (LCA Guidelines, p. 13).

The proposed open space/wildlife habitat contract area is coterminous with the parcel boundaries. Due to the location of the property within and adjacent to the Santa Clara River, and the ability and intent for the existing row crops to be converted to open space and wildlife habitat, the size of the contract area is sufficient to support the open space purpose of the contract areas.

Therefore, the property that is the subject of the proposed LCA contract meets this eligibility requirement of the County LCA Guidelines.

d. The Subject Property must be designated by the Board as Wildlife Habitat Area, which is defined as "an area of great importance for the protection or enhancement of the wildlife resources of the state" [Government Code Section 51201 (j)] (LCA Guidelines, p. 12).

Before the Board may make the Wildlife Habitat Area designation, it shall first consider the recommendations of the Planning Commission and it shall consult with and consider the recommendations of the California Department of Fish & Game, who uses its own set of criteria (LCA Guidelines, p. 13).

In order for the proposed open space/wildlife habitat contract to be approved and recorded, the Board of Supervisors must designate the property as Wildlife Habitat Area (WHA). In a letter dated September 5, 2012 (Exhibit 9), from Edmund Pert, Regional Manager, South Coast Region, California Department of Fish and Game (CDFG), to Andrea Ozdy, the CDFG has indicated its support of open space/wildlife habitat contract on the subject property.

Therefore, considering Ms. Danko's analysis and conclusion above that land subject to the contract proposal contains important wildlife habitat, and considering CDFG's support of the contract, the eligibility requirements are met so that the Planning Commission may recommend creation of a WHA for the property that is the subject of the proposed contract.

Based on the evaluation above, PL12-0071 complies with the eligibility standards required in the LCA Guidelines for open space/wildlife habitat contracts.

F. ADDITIONAL FINDINGS FOR FARMLAND SECURITY ZONE AREAS (FSZAs)

PL12-0071 must meet the following additional eligibility requirements of the Ventura County LCA Guidelines (pp. 10-11) to qualify for a FSZA contract:

a. The land must be within an AGP (LCA Guidelines, p. 11).

The portion of the property that has an "Agricultural" General Plan land use designation is within AGP 3-10. AGP 3-10 is proposed to be expanded to accommodate the contract on the portion of the property that has an "Open Space" General Plan land use designation.

Therefore, the land that is the subject of the proposed LCA contract meets this eligibility requirement of the County LCA Guidelines.

- b. The land must be designated on the Important Farmland Series Map ("Map") as predominantly one of the following:
 - a. Prime Farmland,
 - b. Farmland of Statewide Significance,
 - c. Unique Farmland, or
 - d. Farmland of Local Importance (LCA Guidelines, p. 11).

The property on which the proposed contract site is located contains soils classifications of "Prime," "Unique," and "Other," according to the Important Farmland Inventory.

Therefore, the land that is the subject of the proposed contract meets this eligibility requirement of the County LCA Guidelines.

c. No land shall be included in an FSZA unless expressly requested by the owner (LCA Guidelines, p. 11).

As part of the application package for the contract proposal, the Applicant expressly requested inclusion of land in an FSZA.

Therefore, the land that is the subject of the proposed LCA contract meets this eligibility requirement of the County LCA Guidelines.

d. Any land located within a city sphere of influence shall not be included in an FSZA, unless the creation of the FSZA has been approved by resolution by the city with jurisdiction within the sphere (LCA Guidelines, p. 11).

The property proposed for inclusion in an FSZA is not located within a city sphere of influence.

Therefore, the land that is the subject of the proposed LCA contract meets this eligibility requirement of the County LCA Guidelines.

e. If more than one owner of contiguous properties requests the creation of an FSZA, the County shall place those properties in the same FSZA (LCA Guidelines, p. 11).

The property proposed for inclusion in an FSZA is not located adjacent to any other property within an existing or proposed FSZA.

Therefore, the property that is the subject of the proposed LCA contract meets this eligibility requirement of the County LCA Guidelines.

f. Upon termination of a FSZA/LCA contract, the FSZA shall simultaneously be terminated (LCA Guidelines, p. 11).

The property proposed for inclusion in an FSZA is also proposed for an FSZA/LCA contract. If, in the future, the FSZA/LCA contract is non-renewed and thus expires, the FSZA will terminate along with the contract.

Therefore, the proposed LCA contract meets this eligibility requirement of the County LCA Guidelines.

Based on the above evaluation, PL12-0071 complies with the additional eligibility standards required in the LCA Guidelines for establishing and expanding FSZAs.

G. NOTICES OF NON-RENEWAL

The owners of LCA-contracted land have the right to file a "Notice of Non-Renewal" (NNR), which is the usual method to withdraw property from a contract. Following the recordation of a Notice of Non-Renewal, the contract ceases to self-renew each year, but remains in effect for the remainder of the contract term (i.e., 9 years for a LCA contract, 19 years for a FSZA/LCA contract, or both for an open space/LCA contract).

Pursuant to Section 51243 of the Government Code, whenever land under a LCA or FSZA/LCA contract is divided, the owner of any parcel may exercise, independently of any other owner of portions of original contracts, any of the rights of the owner in original contracts, including the right to file a NNR.

The Board of Supervisors must approve non-renewal of portions of contracted land (LCA Guidelines, p. 19). The Board must make findings that the property remaining under contract would continue to be consistent with the Ventura County General Plan, Zoning Ordinances, State Williamson Act, and the LCA Guidelines. If these findings cannot be made, the applicant may amend the NNR to non-renew all property under contract rather than non-renew only a portion of an LCA contract.

No requests for the non-renewal of a portion of or an entire LCA contract were submitted in 2012.

As requested by your Commission during previous annual hearings on LCA contract proposals, attached is a map identifying the location of contracts with recorded NNRs that will expire within the next 5 to 10 years (Exhibit 10).

H. VENTURA COUNTY LCA PROGRAM SUMMARY

The County Assessor's Office will submit the 2012 Fiscal Year Subvention Report to the California Department of Conservation no later than October 31, 2012. When available, a summary of the report will be provided to the Planning Division and your Commission, as you have requested in previous hearings for LCA contracts.

I. PUBLIC COMMENT

The Planning Division published a notice of the Planning Commission hearing on this matter in the *Ventura County Star* (countywide circulation). The Planning Division also mailed hearing notices to: (1) owners of properties within a 300-foot radius of the boundaries of the proposed contract; and, (2) interested parties. As of the date of distribution of this staff report, the Planning Division did not receive any written comments on the LCA proposal. At the public hearing on this matter, the Planning Division will provide your Commission with any comments that the Planning Division receives after the publication of this staff report.

J. JURISDICTIONAL COMMENT

Planning Division staff sent the public hearing notice and this staff report to the Local Agency Formation Commission (LAFCo) for review and comment. Planning Division staff also sent notices to the Planning Directors of the cities located within one mile of the proposed contract. At the public hearing on this matter, Planning Division staff will present any comments that the Planning Division receives.

K. APPROVAL OF EXPANSION OF AGP, ESTABLISHMENT OF FSZA, DESIGNATION OF WILDLIFE HABITAT AREA, AND RECORDATION OF FSZA/LCA CONTRACT

The Planning Division will forward the proposed FSZA/LCA contract, AGP expansion, Wildlife Habitat Area designation, and FSZA establishment to the Board for consideration of approval by resolution. If the Board approves these proposal, the property owner and the Chair of the Board must execute the FSZA/LCA contract, which the County Clerk and Recorder's Office must record. The Planning Division will arrange to have the County Clerk and Recorder's Office record the contract by no later than December 31, 2012. The contract will become effective on January 1, 2013.

L. RECOMMENDED ACTIONS

Based upon the preceding analysis and information provided, Planning Division staff recommends that the Planning Commission take the following actions:

- 1. **CERTIFY** that the Commission reviewed and considered this staff report and all exhibits thereto, and has considered all comments received on this matter;
- 2. **ADOPT** a resolution recommending that the Board of Supervisors take the following actions:
 - a. FIND that the expansion of an existing AGP, the establishment of the proposed FSZA, and the entering into of an FSZA/LCA contract for PL12-0071 is categorically exempt from CEQA environmental review (Title 14, California Code of Regulations, Chapter 3, § 15317);
 - b. **MAKE** all of the proposed findings for PL12-0071, which are set forth in Sections D, E, and F of this staff report;
 - c. **EXPAND** an existing AGP to accommodate the proposed FSZA/LCA contract, as discussed in Section D of this staff report and as shown in Exhibit 2:
 - d. **DESIGNATE** Wildlife Habitat Area for the proposed FSZA/LCA contract, as discussed in Section E of this staff report and as shown in Exhibit 6;
 - e. **ESTABLISH** the proposed FSZA to accommodate the proposed FSZA/LCA contract, as discussed in Section F of this staff report and as shown in Exhibit 3:
 - f. **APPROVE** and **EXECUTE** the new FSZA/LCA contract, as described in Section A.8 of this staff report and as shown in Exhibit 4;
 - g. DIRECT the County Clerk/Recorder to record the new FSZA/LCA contract, which is described in Section A.8 of this staff report, after the owner of the subject property and the Chair of the Board have executed the contract; and,
- 3. **SPECIFY** that the Clerk of the Planning Commission 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.

M. OTHER PUBLIC HEARINGS

PL12-0071 is scheduled for public hearing before the Board on Tuesday, December 11, 2012, at 10:00 a.m. in the Board of Supervisors Hearing Room, Administration Building, 800 South Victoria Avenue, Ventura, California.

If you have any questions concerning the information presented in this staff report, please contact Andrea Ozdy, LCA Program Planner, at andrea.ozdy@ventura.org or at (805) 654-2453, or Daniel Klemann, Residential Permits Section Manager, at daniel.klemann@ventura.org or at (805) 654-3588.

Prepared by:

Andrea Ozdy, LCA Program Planner Ventura County Planning Division

Reviewed by:

Kim L. Prillhart, Director

Ventura County Planning Division

Attachments:

Exhibit 2 - Map of Proposed Expansion of AGP 3-10

Exhibit 3 - Map of Proposed Establishment of FSZA 3-10:1

Exhibit 4 - Map of Proposed FSZA/LCA Contract 3-10:1.1

Exhibit 5 - Aerial Photograph of Proposed FSZA/LCA Contract 3-10:1.1

Exhibit 6 - Map of Proposed Wildlife Habitat Area

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