



**VCHP Letter to  
Ventura's City Manager  
RE: The General Plan**

June 12, 2005

Dear Rick Cole and City Planning Staff,

We commend staff for their work in drafting a document as complex and nuanced as the General Plan. We are very appreciative of the staff's willingness to consider proposed textual changes from the community. We have worked hard to meet the staff deadline of June 13, 2005 for proposed textual revisions. In this document, we have tried to provide specific recommended changes in the document rather than submit general comments so as to facilitate revision of the plan.

First, we are very encouraged by the text, policies and actions in the draft General Plan that place a strong emphasis on preservation of Ventura's hillside and open space resources. Through the Vision document and at the ballot box, our citizens have made clear their preference for preserving the hillsides from development.

In particular, we support the recommendation that the City's Sphere of Influence Boundary be coterminous with the existing City Limits in the hillsides. (See page 1-5, Action 1.13.) We also fully support the designation of the hillside areas as "Parks and Open Space" (Draft General Plan Diagram, page 1-5). Together, these provisions are a great advancement in our efforts to assure permanent preservation of Ventura's unique hillside lands. We offer the following comments to strengthen the general plan's provisions with specific language and action items and to assure that hillside preservation is fully incorporated into all the relevant portions of the document.

The Overview (p.11) says that state law requires that the General Plan include an Open Space Element that “details techniques for preserving open space areas...” Here are some suggestions to confirm that the Ventura General Plan does so. The page and paragraph references are to the May 24, 2005, Public Review Draft of the 2005 Ventura General Plan.

## **CHAPTER 1, OUR NATURAL COMMUNITY**

### **Page 1-1, last paragraph**

This paragraph can be read to imply that the hillsides should “remain visible and accessible.” Since the hillsides are in fact private property to which there is no public access at present, we suggest adding the following italicized language to this paragraph:

*“Protecting Ventura's fragile natural resources is a fundamental focus of the 2005 Ventura General Plan. Policies and actions in this chapter are directed at assuring the permanent preservation of Ventura's coastal, hillside and watershed features and at demarcating the boundaries for urban development to define and enhance the city's identity. These policies and actions will preserve these open space areas for natural resource conservation, public access and outdoor recreation, scenic views, public health and safety and agricultural activities.*

### **Page 1-3, Hillsides Discussion, second paragraph**

This paragraph should be revised to correctly describe Measure P and more thoroughly provide a history of the hillsides, including especially (1) the Vision's statements regarding the hillsides, (2) the voters' voice on hillside issues and (3) the City's partnership with the Ventura Hillsides Conservancy, as follows.

*Ventura's strong sentiments for hillside preservation are expressed in the Vision's findings that natural resource protection, recreational trails, bikeways and open spaces, and preservation of views to and from the hillsides are important elements in future treatment of the hillsides. The Vision calls for the creation of an Open Space Preservation Plan for the hillsides that balances recreation use with natural hillside protection.*

*The community's deep-seated support for hillside preservation has been evident in its position on two different ballot measures. In 2001, 79% of Ventura's voters enacted the Hillside Voter Participation Area (Measure P,) in effect until 2030, which prohibits extension of city urban services to a large portion of the hillsides without voter approval—effectively placing key decisions on whether the hillsides will be developed in the hands of the City's voters. In 2002 Ventura's electorate was asked to approve a*

*hillsides master plan that called for development of 1,390 dwelling units on the hillsides with the remainder as open space. This plan (known as the Open 80 Master Plan or Measure A) was defeated by a 71% vote.*

*Since that time, citizens have formed a non-profit land trust, the Ventura Hillsides Conservancy, with the mission of permanently preserving Ventura's hillside lands for open space, public recreation, habitat conservation and protection of scenic views through acquisition of land and conservation easements. In September 2004, the City Council unanimously endorsed an ongoing partnership with the Conservancy.*

*The hillsides currently are privately held and not accessible to the public. The plan is addressing the community's desire to preserve the hillside scenic vistas and increase opportunities for outdoor recreation activities such as hiking, mountain biking, trail running and bird watching by including policies and actions to protect these lands from development and to further acquisition of the land or conservation easements for creation of a natural open space reserve, the Ventura Hillsides Preserve.*

**Page 1-5, Actions to implement Policy 1B: Increase the area of open space protected from development impacts.**

Action 1.12 presently calls for updating the Hillside Management Program “as necessary” to ensure protection of open space lands. While the Hillside Management Program is a key component of the General Plan, it is a set of policies for how hillside development, where it is allowed, should occur; the HMP is not a vehicle for land preservation. The more appropriate section for discussion of the HMP is Chapter 3, Our Well Planned and Designed Community, as described below in the comments on that chapter.

Delete Action 1.12 and add instead the following actions:

*Action 1.\_\_\_: Actively seek local, state, and federal funding sources for acquisition of hillside lands or conservation easements to achieve hillside preservation and stewardship so as to assist in meeting watershed protection, habitat restoration, recreation, and urban design objectives of this plan.*

*Action 1.\_\_\_: Work with the Ventura Hillsides Conservancy, the California Coastal Conservancy, and other established land conservation organizations to forward establishment of a Ventura Hillsides Preserve.*

*Action 1: \_\_\_: Create specific Open Space provisions within the form-based code revisions to assure that open space land, whether in public or*

*private ownership, is preserved as a desirable means of shaping the City's external form and size, and of serving the needs of the residents.*

## **CHAPTER 2, OUR PROSPEROUS COMMUNITY**

### **Page 2-5, Actions to implement Policy 2D: Expand tourism opportunities.**

The Ventura Visitors and Convention Bureau reports that one of the most frequently asked questions it receives from tourists visiting Ventura, is “Where can we go hiking?” In keeping with both the General Plan's policies and the Economic Development Program's aims to increase tourism in Ventura, include an additional action item for Policy 2D:

*Action 2.\_\_\_: Work with private and government organizations to establish a trails network within the planned Ventura Hillsides Preserve to provide tourist opportunities for hiking, mountain biking, trail running, bird watching and similar outdoor recreation activities.*

## **CHAPTER 3, OUR WELL PLANNED AND DESIGNED COMMUNITY**

### **Page 3-6, Planning Designations, Parks and Open Space**

One of the new General Plan land use categories is “Parks and Open Space.” Presently the discussion of the Parks and Open Space land use category in the draft plan addresses only the parks side of the designation. Additional language is needed to further describe the Open Space aspect of the category:

*The Open Space designation is intended to assure that the land remains in open space type land uses until such time as the property or conservation easements can be acquired to permanently preserve the land in a Ventura Hillsides Preserve for public recreation, habitat conservation, watershed protection and scenic views.*

### **Page 3-9**

There is a parallel between preservation of the hillsides and agricultural land preservation under SOAR. These two topics are both addressed in Chapter 1, Our Natural Community. Presently, Chapter 3 addresses only agricultural land preservation in detail. A discussion here of hillside preservation is appropriate and warranted given the importance of City land use policies in shaping future preservation of the hillsides and the strong public sentiment for hillside preservation. This discussion would cover three related hillside topics: how the Land Use Plan addresses the

hillsides, the General Plan's concept of a Ventura Hillsides Preserve and the Hillsides Management Program.

With regard to how the draft General Plan addresses the hillsides, we are extremely pleased that the Draft General Plan Diagram (p. 17) designates the majority of the hillsides as Parks and Open Space. There is one aspect of the Draft General Plan Diagram that we find puzzling, however: some of the hillside land is shown for residential development, and whether hillside land is designated for development appears to be based on the sole consideration of political jurisdiction. In other words, if the hillside land is located within the City limits, it is designated for residential development and if the hillside land is located outside the City limits and within the County of Ventura, it is designated for open space preservation. There is no clear planning basis for this distinction articulated in the document.

If “protection of the hillsides is vital to the community” (page 1-3) and “our goal is to protect our hillsides” (page 3-1), the hillside lands within the City's jurisdiction must be designated as Parks and Open Space, too. This is especially true of those areas that are greater than 30% slope (as shown on Figure 7-1 of the draft General Plan) or with highly expansive soils making them prone to landslides (as shown on Figure XI-3 of the Comprehensive Plan Update Report, dated August 2002). Here we have an opportunity to avert in Ventura the kinds of landslide disasters that other Southern California communities have experienced this past winter by designating risky hillside lands as open space rather than planned for construction of hillside residences.

For consistency with the Plan's stated aim of hillside preservation and for public safety, the Draft General Plan Diagram must be revised to designate the hillside lands within the City limits as Parks and Open Space. *(The designation of hillside lands for residential development is of particular concern with respect to the area east of Hall Canyon and below Breaker shown on the Draft General Plan Diagram as Medium Density Residential. This area is some of the steepest hillside terrain in the City.)*

We suggest adding a hillsides discussion to Chapter 3, inserted between the discussion of Agricultural Lands on Page 3-9 and the discussion of Growth Management on page 3-10, worded as follows:

### ***Hillsides***

*Ventura's hillside open space is an integral part of the community's natural setting. The hillsides form a beautiful physical backdrop to the urbanized city that informs the community's character as much as the Pacific Ocean does. For many years, residents took for granted the undeveloped hillsides, their scenic views, and their native habitats. Recent*

*development proposals and stepped up enforcement of private property rights have placed hillside preservation at the forefront of community concern. As the city moves forward with infill and increased density under the new development code, the open spaces surrounding the City will become more and more important as natural counterparts to the urban fabric, both visually and as recreation spaces.*

*Currently the hillsides are privately owned and used for cattle ranching, oil extraction and orchard crops. The General Plan reinforces these present uses with the Parks and Open Space designation and also envisions the future creation of a Ventura Hillsides Preserve through acquisition of land and conservation easements. A Ventura Hillsides Preserve would accomplish the community's goals, as embodied in The Vision, of balancing recreation and natural resource protection in the hillsides and protecting the City's scenic views.*

*The Ventura vicinity currently lacks opportunities for land-based recreation in a natural setting—opportunities for hiking, mountain biking, trail running and bird watching that a regional park or preserve would provide. Creation of a Ventura Hillsides Preserve will offer these opportunities for residents and visitors alike.*

*Initial evaluation of the hillsides vegetation by the Ventura Hillsides Conservancy has shown a variety of native plant communities exist within the hillside areas that are not developed or in agricultural use. These native plant communities include coastal sage scrub, coast live oak and annual grasslands. In turn, these native plant communities house the associated native wildlife that depends on these habitats. Implementation of a Ventura Hillsides Preserve will allow for preservation of these ecologically important areas and supply opportunities for habitat restoration and enhancement.*

*The policies and actions in this chapter call for retention of the hillsides in their current open space uses until such time as the property or conservation easements are acquired for creation of a Ventura Hillsides Preserve that will balance public recreation opportunities with resource conservation.*

**If any** portion of the hillside lands within the City is designated for development in the final General Plan, the General Plan must specifically incorporate the Hillside Management Program (HMP). Both the current Comprehensive Plan and the HMP itself provide that the HMP is incorporated by reference into the Comprehensive Plan. *The HMP contains key City policies for areas where development might be allowed in the hillsides. In particular, the HMP designates the appropriate density of development on a particular parcel through its “HPR” density*

*categories and delineation of a slope/density formula for determining the actual building potential of a property. The HMP also establishes a number of vital prerequisites for hillside development to assure that building in the hillsides does not overly burden the City's infrastructure or adversely impact existing down slope neighborhoods.* These are all extremely important protections that we fear are becoming lost in the shuffle of condensing the land use categories and rewriting the General Plan.

To assure that the essential protections to the City and its residents that are included in the HMP remain in place, the draft General Plan must be revised to incorporate the HMP by reference and place the HMP in the plan as an additional appendix. Further, if any lands presently subject to the HMP are shown for development in the General Plan, a new diagram must be added that shows the “HPR” density designation of those lands under the HMP. Without these measures, the HMP will become meaningless and the General Plan will be taking a step backward, opening the door to irresponsible hillside development at inappropriate densities.

**Page 3-12, Actions to implement Policy 3D: Continue to preserve agricultural and other open space lands within the City's Planning Area.**

Action 3.14 should be revised to include hillside preservation concerns by adding the italicized language:

Action 3.14: Pursuant to SOAR *and the community's demonstrated interest in preserving hillside lands*, adopt development code provisions to “preserve agricultural and open space lands as a desirable means of shaping the City's internal and external form and size, and of serving the needs of the residents.”

Add the following action items to Policy 3D:

Action 3-\_\_: *Work with the Ventura Hillsides Conservancy, the California Coastal Conservancy and other established land conservation organizations to seek funding for the establishment and stewardship of a Ventura Hillsides Preserve.*

**CHAPTER 4, OUR ACCESSIBLE COMMUNITY**

**Page 4-3, bullet points on specific recommended pedestrian improvements, add the italicized language**

- creating trails along watercourses and through the hillsides , *as part of the planned Ventura Hillsides Preserve*

## CHAPTER 6, OUR ACTIVE COMMUNITY

### Page 6-1, new third paragraph

Unfortunately the discussion of park standards does not address regional park standards. The benchmarks used in the existing discussion are the National Park and Recreation Association Standards. The NPRA standard for Regional Parks is 20 acres per 1,000 population. Analysis of how Ventura does or doesn't meet this standard must be included here, as well as a discussion of what constitutes a regional park:

*One area the City has not previously addressed is the provision of regional parks. The National Park and Recreation Association benchmark for regional parks is 20 acres per 1,000 residents. Regional parks typically are large in area and provide recreation opportunities in natural areas as opposed to developed parkland. Portions of Arroyo Verde Park and Grant Park serve as these kinds of open space areas, as do the beaches in the City. What Ventura lacks, however, is a large natural area for activities such as hiking, trail running, mountain biking and other recreation types that require substantial tracts of undeveloped land. For this and other reasons delineated in this document, the General Plan includes a future Ventura Hillsides Preserve.*

Table 6-1 needs to include a regional park standard:

#### **Park Type: Regional**

#### **Standards**

**City of Ventura: 20 acres**

**National Park &  
Recreation Association: 20 acres**

### Page 6-2

Revise the first paragraph to read:

The public park and open space system in Ventura includes neighborhood, community, citywide *and regional parks, but no large public open space areas.*

Revise the second paragraph to include an additional bullet point:

- *providing increased passive recreation opportunities including hiking, mountain bike riding, and nature walks*

Add after the Linear Parks discussion:

*Regional Parks and Preserves*

*Regional parks are defined generally as facilities with unique natural resources, facilities of large size, and ones that draw from a wide region. Typically greater than 100 acres, these large open space areas serve as recreation places for residents and visitors while fulfilling roles in watershed, view shed and habitat protection. Regional parks can be the location of nature walks, hiking and mountain biking trails, bird watching, and other outdoor recreation that takes place in natural areas and does not involve organized sports.*

*In many locales, the county or a specific parks or open space agency serves as the provider of regional parks. However in our part of Ventura County, there is no parks or open space agency and County parks are not fully funded. With a regional park standard of 20 acres per 1,000 residents, over 2,000 acres of regional parks are required to meet the standard. Given the lack of natural areas for so-called passive recreation (activities that take place outside developed parkland), and the community's interest in preserving and recreating in the hillsides, this plan identifies the creation of a future Ventura Hillsides Preserve. Such a facility will meet the community and regional needs for passive recreation opportunities to enjoy the land in its natural state as well as meet the City's goal of preserving the beauty and biological diversity of these critical hillsides lands.*

**Page 6-3, Table 6-2, City Park Facilities**

Revise the table to add a column for Regional Parks and indicate in that column the acreage of the portions of Arroyo Verde Park and Grant Park that are undeveloped open space.

**Page 6-5, Policy 6A, Expand the park and trail network to link shoreline, hillside and watershed areas.**

Remove the vague language in the action items and revise them to include creation of the Ventura Hillsides Preserve:

*Action 6.1: Develop new neighborhood parks, pocket parks and community gardens in conjunction with new development or densification.*

*Action 6.2: Require new development to provide pocket parks, tot lots, seating plazas, and other green spaces in accordance with the scope and scale of the development.*

*Action 6.3: In preparing the form-based code, include provisions that require walkways or trails to provide connections between various portions of a neighborhood or district, and along corridors for greater connectivity within the city and between the hillsides and beaches.*

[Retain Actions 6.4, 6.5 as they are.]

*Action 6.6 Update plans for and complete the linear park system.*

*Action 6.7 Work with the Ventura Hillsides Conservancy, the California Coastal Conservancy, and other established land conservation organizations to forward establishment of a Ventura Hillsides Preserve that balances public recreation and habitat conservation and provides public trails in the hillsides.*

### **Figure 6-1, Public Facilities**

Revise this figure to include a planned future Ventura Hillsides Preserve, shown in light green. The area indicated should run at least from Grant Park past Arroyo Verde and encompass those areas of the hillsides presently shown for linear parks.

Revise the key to this figure to identify that areas shown in light green are “*Planned Future Open Space Preserve or Linear Park*” and that the areas in dark green are “*Existing City, County, State and Linear Parks.*”

Again, thank you for this opportunity to provide comments on the draft General Plan for the City of Ventura. If you have any questions or concerns regarding these comments, please do not hesitate to contact us.

Sincerely,

Diane Underhill, **President**

Claudia Armann, **Vice President**