



December 4, 2025

Ms. Amanda Fagan
Ventura County Transportation Commission
Planning and Sustainability Director
751 E. Daily Dr. Suite 420
Camarillo, CA 93010

Sent by email to: Amanda Fagan afagan@goventura.org

Subject: Ventura County General Plan Program Implementation Materials – Request for ALUC Review

Dear Ms. Fagan,

The County of Ventura Planning Division has completed draft zoning ordinance amendments, project application updates, maps, and related documents that require Airport Land Use Commission (ALUC) review pursuant to the State Aeronautics Act (SAA). As you're aware, the SAA requires that any general plan amendment or zoning ordinance affecting property within an airport influence area must be referred to the ALUC for a determination of consistency with the Airport Land Use Compatibility Plan (ALUCP). In accordance with these requirements, we are submitting the enclosed materials for review by the ALUC, and we understand the ALUC will consider them at its meeting scheduled for January 9, 2026.

The package includes updated height and airspace protection standards, land use compatibility requirements, renewable energy siting limitations, and procedures for early project referral to Naval Base Ventura County (NBVC). Throughout the drafting process, the County has coordinated with NBVC staff, and the enclosed materials reflect the comments we have received from them. The information below summarizes the enclosed project documents.

General Plan Program Details

The County's General Plan includes four programs to ensure compatibility between NBVC operations and the surrounding unincorporated areas under Ventura County's jurisdiction. **Exhibit 1** includes the text of the four General Plan Programs. The documents we've generated to address these Programs include the following:

Non-Coastal and Coastal Zoning Ordinance amendments (Exhibit 2). Generally, these ordinance amendments address airspace and height protection, renewable energy and energy storage standards, and land use compatibility within the proposed Military Land Use Compatibility (MLUC) Overlay Zone surrounding NBVC – Point Mugu. The proposed MLUC Overlay Zone (See **Exhibit 6** – MLUC Map) is divided into 11 subareas to reflect unique requirements applicable to each subarea.

Please note that within Subareas 1 through 5, the ordinances prohibit development of renewable energy production and energy storage systems due to limited access to transmission lines and proximity to sensitive flight corridors, while allowing such uses in Subareas 6 and 7 following consultation with the Department of Defense (DoD) Siting Clearinghouse and permit approval.

The ordinance amendments also prohibit solar concentration facilities, include a reference to the FAA filing requirement for development applications to ensure consistency with CFR Part 77 through submission of FAA Form 7460-1, and align County development standards with federal airspace protections.

The Planning Division Discretionary Permit Application (Exhibit 3). The existing application will be revised to include new screening questions that identify projects located within the MLUC Overlay Subareas, Bird/Wildlife Aircraft Strike Hazard (BASH) zones (identified by NBVC), radio frequency review areas within 10 miles of NBVC, and Airport Safety Zones requiring review by the Ventura County Transportation Commission (VCTC) for consistency with the Airport Comprehensive Land Use Plan (ACLUP). Applicants proposing renewable energy or energy storage projects within MLUC Subareas 6 or 7 are required to document consultation with the DoD Siting Clearinghouse. The updated application also emphasizes early coordination with the NBVC Community Planning and Liaison Officer (CPLO), with County staff available to facilitate this coordination.

The Military Land Use Compatibility Project Referral Form (Exhibit 4). This form will ensure early coordination with NBVC for projects involving bird attractant uses within designated Bird/Wildlife Aircraft Strike Hazard (BASH) zones or the use of the radio frequency spectrum. Feedback from the NBVC CPLO is incorporated into the County's review process at the outset of application processing to identify and resolve potential compatibility concerns as early as possible.

The Frequency Spectrum Encroachment Review Form, attached here as an appendix to **Exhibit 4**, would be used for projects located within 10 miles of NBVC that require further review by NBVC. The form collects detailed technical parameters in development applications, including frequency allocation, output power, antenna specifications, and Hazards of Electromagnetic Radiation to Personnel (HERP) and to Fuel (HERF) distances. CPLO review and clearance via this form will serve as a condition of approval for discretionary projects involving radio frequency technology.

The Property Owner Risk Acknowledgment (Exhibit 5). This acts as the formal disclosure document required for projects located within MLUC Subareas 8 and 9 (i.e., areas within Accident Potential Zones and high-noise contours). The acknowledgment documents potential noise and accident risks associated with nearby military aircraft operations and must be recorded against the property title and filed with the County to ensure permanent disclosure for future owners and tenants. The proposed standards require property owners to record a risk acknowledgment with the County prior to approval of new or expanded dwelling units or habitable accessory structures.

The MLUC Categorical Exemption (Exhibit 7). This notice was prepared for the military programs, as required by the Consistency Review Instructions. This notice is for ALUC's review and only includes the military compatibility programs, which are all categorically exempt.

Summary of Approach

Collectively, these amendments:

- Address **land use prohibitions, height standards, frequency spectrum protection, and accident/noise risk disclosure** in a manner consistent with AICUZ, JLUS, and federal/state law;
- Provide **development standards** for projects near NBVC, that align with General Plan policies and programs; and
- Establish a **phased review process** that begins with early project referral and coordination with NBVC, progresses through technical review as needed, and concludes with appropriate disclosure and documentation requirements.

Next Steps

We respectfully request the ALUC's review and analysis of the enclosed draft ordinance amendments and exhibits. The County of Ventura remains committed to close coordination with VCTC and the ALUC to ensure that local land use policies and practices support safe, compatible development within airport influence areas.

If you have any questions, please feel free to contact me at (805) 654-2481 or Shelley Sussman of my staff at (805) 654-2493. Please send any comments or proposed revisions by email to Shelley Sussman at shelley.sussman@venturacounty.gov

Sincerely,



Dave Ward, AICP
County of Ventura Planning Director
Resource Management Agency

Exhibits

- 1 Ventura County General Plan Program text
- 2 Draft Non-Coastal and Coastal Zoning Ordinances (excerpts)
- 3 Draft Planning Division Discretionary Permit Application
- 4 Draft Military Land Use Compatibility Project Referral Form, Frequency Spectrum Encroachment Review Form
- 5 Draft Property Owner Risk Acknowledgement Form
- 6 Proposed MLUC Overlay Zone maps
- 7 Draft MLUC Categorical Exemption