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December 17, 2025

Ventura County Transportation Commission
Attn: Amanda Fagan, Director of Planning & Sustainability
751 E. Daily Drive, Ste. 420
Camarillo, CA 93010
via email: spbl.trail@goventura.org

**Re: Comments on Notice of Preparation for the Santa Paula Branch Line
Trail Master Plan Update Environmental Impact Report**

Dear Ms. Fagan:

The Ventura County Coalition of Labor, Agriculture and Business (VC CoLAB) submits the following comments regarding the scope and content of the Environmental Impact Report (EIR) for the Santa Paula Branch Line (SPBL) Trail Master Plan Update. These comments are submitted for inclusion in the administrative record and to ensure that the EIR complies with the substantive and procedural requirements of the California Environmental Quality Act (CEQA), Public Resources Code §21000 et seq., and the State CEQA Guidelines, Cal. Code Regs. tit. 14, §15000 et seq.

VC CoLAB advocates on behalf of farmers, landowners, and business stakeholders throughout Ventura County, including the Heritage Valley. Nearly the entire SPBL corridor traverses or is immediately adjacent to high-value commercial agricultural production, primarily citrus, avocado, row crops, and nursery stock, all subject to extensive federal, state, and local regulation. Because the proposed multi-use trail introduces year-round public activity directly into active agricultural areas, the EIR must thoroughly evaluate all direct, indirect, cumulative, and regulatory impacts to agriculture, public health and safety, food safety compliance, wildfire hazard, biosecurity, and property rights.

CEQA Requires a 2025 Baseline; the 1999/2000 EIR Cannot Be Used or Updated

Under CEQA Guidelines §15125(a), the EIR must evaluate conditions as they exist when the NOP is published. The prior 1999/2000 EIR is outdated and cannot be used as a baseline or "updated," because:

- **Agricultural regulations have significantly changed.** The federal Food Safety Modernization Act (FSMA) did not exist in 1999. Department of Pesticide Regulation (DPR) and US EPA restricted-entry intervals (REIs), drift regulations, field posting rules, and label requirements are significantly more stringent.

- **New invasive species and quarantines have entered Ventura County.** The California Department of Food and Agriculture (CDFA) Huanglongbing (HLB) disease and its insect vector, the Asian Citrus Psyllid (ACP), quarantine zone now covers large portions of the proposed bike trail corridor. The Tau fruit fly and other pests were not present or anticipated in 1999. Current quarantine boundaries must be incorporated into the project background and EIR baseline.
- **Changed rail operations.** Recreational railbikes were not operating in 1999, and freight and other rail operations have changed significantly in the intervening 25 years.
- **Wildfire hazard redesignations.** The California Department of Forestry and Fire Protection (CalFIRE) has updated the Fire Hazard Severity Zone maps. Ventura County adopted these new designations in 2025, resulting in the majority of the corridor being classified as 'Very High' fire hazard.
- **The project purpose and objectives have changed.** Active transportation, Vehicle Miles Traveled (VMT) reduction, transit connectivity, and equity objectives were not included in the 1999 project description.

Because of these issues, CEQA does not allow reliance on the earlier EIR. A new, complete, stand-alone EIR that analyzes current regulatory and operational conditions is legally required.

Agriculture Must Be Analyzed as a Potentially Significant Impact Category

Agriculture in the SPBL corridor is not passive open space or a mere “beautiful backdrop” for the public to enjoy. It is a regulated industrial operation that requires intensive, continuous, and year-round activities. CEQA requires the identification, analysis, and mitigation of all significant impacts.

For each impact category identified in this section, CEQA requires that the EIR identify all feasible, enforceable mitigation measures tied to performance standards.

The EIR may not defer mitigation to future plans, rely on unenforceable and vague measures such as signage or voluntary coordination, or assume compliance through education alone. Where impacts cannot be reduced to less-than-significant levels through mitigation, the EIR must clearly disclose this finding and analyze alternatives that avoid the impact entirely.

- **Loss and Impairment of Agricultural Land:** The rail line corridor is narrow and, in many locations, bifurcates through the center of orchard blocks and active crop-growing fields. Reasonably foreseeable impacts include the removal of trees and productive acreage and disruption of root zones and canopy structure for remaining trees; loss of equipment access points, turn areas, and staging zones; and interference with irrigation mainlines, valves, pumps, filters, and drip systems.

- **Conflicts with Crop Protection Requirements:** All crops, whether grown conventionally or organically, utilize crop protection materials and activities. These crop protection activities require buffer zones, state and/or federally mandated restricted-entry intervals (REI) of 24–72+ hours, condition-dependent determination for use and application, and weather-dependent scheduling.

A bike trail that encourages and allows public access during REI periods creates a substantial risk of noncompliance with USEPA, DPR, CDFA, and County Agricultural Commissioner regulations, rules, and laws. Furthermore, there will be increased liability exposure for both Ventura County and growers.

If the bike trail is open to the public during application and REI periods, farmers will be unable to perform legally mandated crop treatments. This will result in increased pest pressure due to delayed or missed treatment applications and, ultimately, the loss of crops, trees, and even entire areas of agricultural operations along the bike trail corridor.

Feasible mitigation must include mandatory, grower-controlled trail closures during application and REI periods, enforceable buffer zones within the bike trail property boundaries, and operational restrictions that prevent public access during treatment windows. These mitigation measures must be developed and implemented based on crop and REI regulatory needs, not on optimal or desired public access conditions.

- **HLB/ACP Quarantine and Biosecurity:** The SPBL corridor runs through current CDFA HLB/ACP quarantine zones in the Heritage Valley. Reasonably foreseeable impacts from allowing public access through a quarantine zone include the uncontrolled movement of plant material, fruit, or ACP vectors from the quarantine zone to outside the zone, thereby spreading the infestation; contamination of traps and monitoring equipment used by CDFA/USDA/County Agricultural Commissioner and farmers to monitor and control disease spread; violation of quarantine perimeter controls; and an inability to comply with CDFA-mandated response measures.

These are significant, regulated impacts requiring detailed CEQA analysis. Because HLB is a federally and state-regulated plant disease with no cure and catastrophic economic consequences, the EIR must identify all feasible, enforceable mitigation measures to prevent disease spread. Such measures must include, but not be limited to: physical access controls, trail closures during the quarantine period, restricted access zones, enforceable public-use limitations within quarantine perimeters, and design features that prevent the movement of plant material.

Given the nature of HLB transmission and the extreme threat this disease poses, if disease-spread risks cannot be fully mitigated, alternatives that avoid quarantine zones must be analyzed.

- **Construction Impacts:** The EIR must evaluate construction-phase impacts, which will be substantial given the physical condition of the rail corridor and the narrow configuration

of the right-of-way. Construction activities such as excavation, grading, staging, equipment access, and materials delivery will directly affect adjacent farming operations through dust generation, noise, equipment interference, and crop damage. Many construction activities will be incompatible with ongoing agricultural operations, particularly during sensitive growing and harvest periods.

- **Food Safety and FSMA Compliance:** FSMA requires farmers to control potential sources of contamination. A public-use trail adjacent to or through production areas introduces uncontrolled human activity that can compromise food safety compliance. Risks include fecal contamination from trail users, introduction of pathogens, illegal dumping, and contamination of water sources. Many farmers in the corridor are subject to third-party food safety audits, and auditors may require costly additional mitigation or refuse certification if contamination risks from trail users cannot be controlled.

The EIR must analyze whether FSMA compliance can be maintained with a public trail and identify enforceable mitigation to prevent contamination. Where mitigation is infeasible, alternatives must be analyzed.

- **Wildfire Risk:** The majority of the corridor is designated as 'Very High' fire hazard by CalFIRE. The EIR must evaluate wildfire ignition risk from trail users, emergency access constraints, evacuation route conflicts, and the ability to comply with Red Flag conditions that prohibit spark-producing activities. Given the narrow corridor configuration and limited emergency access, the EIR must analyze whether the trail can be operated safely during fire season and whether trail closures will be required during Red Flag conditions.
- **Easements:** The corridor includes complex easement relationships, including agricultural easements, utility easements, and drainage easements. The EIR must evaluate conflicts between trail use and existing easement rights, including whether conversion to trail use is consistent with the terms of agricultural conservation easements and whether trail construction will interfere with drainage, utilities, or access rights held by property owners.
- **Trespass, Liability, and Enforcement:** Per the Ventura County Sheriff Department's Agricultural Crimes Task Force, agricultural operations adjacent to trails experience increased trespass, theft, vandalism, and illegal dumping. The EIR must analyze the reasonably foreseeable costs of enforcement, liability exposure for landowners, and whether adequate enforcement resources exist to prevent trespass and protect agricultural operations.

Many agricultural parcels lack physical barriers between the trail corridor and production areas; the EIR must evaluate whether fencing or other barriers are feasible, the effectiveness of various types of fencing or barriers to mitigate impacts, and identify who will be responsible for construction, maintenance, and enforcement.

Public Safety and Emergency Response

Under CEQA Guidelines §15126.2 and Appendix G, the EIR must analyze potential significant hazards to public safety. On December 11, 2025, an indecent exposure/sexual crime incident occurred on the Calleguas Creek bike path in Camarillo (Camarillo Police Department Report #25-158630), demonstrating that even well-lit, populated urban trails experience criminal activity that threatens trail user safety.

The SPBL corridor presents materially more severe public safety risks than urban trails because it will run through remote agricultural areas with minimal (or no) lighting, limited visibility, few nearby residences, and substantially lower law enforcement patrol coverage than in urban areas. Reasonably foreseeable public safety risks include:

Criminal activity in isolated sections where trail users are vulnerable and unable to summon help quickly

Extended emergency response times in remote Heritage Valley locations compared to urban settings

Poor or nonexistent cell phone coverage in many agricultural areas, limiting ability to call for help

Limited Sheriff patrol resources for continuous coverage of a 27-mile rural corridor

Numerous isolated access points and orchard sections which create increased vulnerability

CEQA Guidelines §15146 requires that the degree of specificity in the EIR corresponds to the degree of specificity in the project description. Because VCTC has identified a specific 27-mile alignment with known geographic location and distinct, mapped alternative routes, the public safety analysis must be conducted at the project level, with site-specific evaluation of emergency response capabilities, communication infrastructure, lighting requirements, and security needs for the proposed alignment. These analyses cannot be deferred by programmatic review.

The EIR must evaluate emergency response times for law enforcement, fire, and medical services for each section of the corridor; communication infrastructure adequacy and costs (cell coverage); lighting requirements and costs for public safety in remote sections; Sheriff patrol coverage capabilities and ongoing costs for a 27-mile rural corridor; security infrastructure needs and costs (emergency call boxes, cameras, etc.); and liability allocation between VCTC, Ventura County Sheriff, and local jurisdictions for security and public safety issues.

Inadequate Notice and Inappropriate Use of Programmatic Review

- **Failure to Disclose Programmatic Review in NOP**

CEQA requires that the scope and level of environmental review be clearly disclosed in the November 17, 2025, Notice of Preparation (NOP). VCTC has failed to meet this basic requirement.

The NOP describes a specific 27-mile infrastructure project with defined termini, enumerated facilities, and identified physical improvements. The project website

reinforces this level of definition, describing "27 miles of improvements" consisting of "over 20 miles of new bicycle and pedestrian trail" with "new, safer pedestrian and cycling crosswalks." The website further states that the EIR will "update existing conditions, phasing plans and cost estimates," language that plainly describes project-level environmental analysis.

Nowhere in the NOP or on the project website does VCTC disclose that it intends to prepare a programmatic EIR, defer site-specific analysis, or require future tiered environmental review before construction. The first public disclosure that VCTC intended to prepare a programmatic EIR occurred at the public scoping meeting on December 11, 2025, 21 days after the NOP was issued and only 10 calendar days before the close of the scoping period.

CEQA does not permit an agency to describe a project with this level of geographic and physical detail while withholding disclosure that environmental review will be conducted at a programmatic level. Furthermore, the burden of clarity rests with the lead agency, not the public. Because VCTC disclosed the programmatic approach for the first time at the December 11 meeting, stakeholders, including agricultural operators and property owners, were deprived of a meaningful opportunity during scoping to comment on whether programmatic review is appropriate for a project of this nature and sensitivity.

CEQA requires meaningful public participation. Late disclosure of the intended level of environmental review—on an issue that is central to the adequacy of the entire environmental analysis—undermines the scoping process and prevents informed public comment. This procedural violation cannot be cured after the scoping period has closed.

- **Failure to Disclose Alternative Alignments in the NOP**

At the December 11 public scoping meeting, VCTC displayed maps showing multiple alternative route alignments, including at least one alternative route (shown as a pink line on the printed map at the meeting) that was not disclosed or described in the NOP. Under CEQA Guidelines §15082(b), the NOP must "provide sufficient information describing the project and the potential environmental effects to enable responsible agencies to make a meaningful response." The disclosure of alternative alignments at the public scoping meeting, only 10 days before the close of the comment period, deprived stakeholders of adequate time to evaluate and comment on environmental effects specific to those alternative routes.

The existence of mapped, detailed alternatives demonstrates that:

- The project is sufficiently defined to warrant project-level analysis of alternatives, as required by Guidelines §15126.6;
- VCTC has the technical capacity to develop and evaluate alternative routes at a project level;
- VCTC's claim that programmatic review is necessary due to uncertainty is contradicted by the existence of defined, mapped alternatives; and,

- VCTC's late disclosure of alternatives has limited meaningful public participation and will result in avoiding site-specific impact analysis that would reveal which alternatives are environmentally infeasible.
- **Substantive Inadequacy of and Mis-Reliance on Programmatic Review**

At the December 11 public scoping meeting, we asked how and why VCTC had chosen to prepare a programmatic EIR rather than a project-level EIR. VCTC's consultant responded that the programmatic approach would provide "flexibility" and would allow VCTC to "adjust the trail alignment over time without having to return to redo environmental review" each time alignment decisions were refined. When asked whether alignment variations could instead be evaluated as project alternatives within a project-level EIR, the consultant explained that alternatives would not provide the same level of flexibility because selecting an alternative under a project EIR would still require additional environmental analysis if the alignment later changed, whereas the programmatic approach would allow VCTC to proceed incrementally and apply standardized mitigation to different alignment segments.

While CEQA allows programmatic environmental review for certain projects, such review is appropriate only when future project details are genuinely uncertain. Here, the project is sufficiently defined to warrant project-level analysis. Under Guidelines §15168(c)(5), even a program EIR must "deal with the effects of the program as specifically and comprehensively as possible." Where impacts are reasonably foreseeable and ascertainable, they must be analyzed, not deferred.

CEQA Guidelines §15146 requires that "the degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity." VCTC has provided substantial documentation (project website, the NOP itself, emails, public meeting notices, and presentations) that the preferred alignment is known; potential project alternatives have been mapped in detail; the impacts are foreseeable and site-specific; right-of-way constraints are documented; and rail operations are established. This level of specificity contradicts the adequacy of a programmatic review at a conceptual level.

Furthermore, VCTC states on the project website that agricultural impacts are "integral to SPBL Trail planning and design" and that "specific and intentional steps will be taken as part of this project to analyze and mitigate potential impacts to agriculture." This acknowledgment directly contradicts any claim that impacts are too uncertain for project-level analysis or that deferral through a programmatic EIR is appropriate. If impacts are "integral" to planning, they are by definition central to the project and must be analyzed now, not deferred through programmatic review.

If VCTC believes the alignment may need to change in the future, the more compliant approach under CEQA is to conduct project-level analysis of impacts associated with all identified alternative routes now rather than defer or attempt to avoid analysis through programmatic review.

The assertion that "standardized" mitigation measures can be applied to "different alignment segments" without site-specific analysis contradicts CEQA's requirement that mitigation measures be specific, feasible, enforceable, and effective. In an agricultural corridor with known biosecurity quarantines, variable wildfire risk, parcel-level operational constraints, and site-specific regulatory requirements on the parcel level, standardized mitigation cannot address the full range of foreseeable impacts without detailed, location-specific analysis.

The consultant's stated purpose of the programmatic approach (to avoid "having to return to do environmental review") is inconsistent with CEQA's mandatory requirements. If VCTC modifies the trail alignment after certification of the programmatic EIR, and if that modification results in new significant impacts or substantially more severe impacts than those analyzed, subsequent CEQA review is required. A programmatic EIR does not exempt an agency from this obligation.

VCTC's expressed intent to use programmatic review to avoid returning for additional environmental analysis when alignment changes occur is procedurally and substantively improper. If the alignment is sufficiently defined to support grant applications, feasibility studies, issuing detailed project site maps (and mapped alternative routes), and public review, then it is sufficiently defined to support project-level analysis. If the alignment remains genuinely uncertain, then environmental review is premature under CEQA. What VCTC appears to seek (and what the programmatic approach cannot lawfully provide) is environmental clearance, now combined with unfettered discretion to modify the project later without additional scrutiny. CEQA does not permit this approach.

If VC CoLAB has misunderstood VCTC's rationale, we welcome clarification. However, based on the explanation provided at the public scoping meeting, and project-specific details provided in the NOP, VCTC website, and other documentation, VCTC appears to have selected programmatic review with the expectation that it will allow alignment modifications without triggering subsequent CEQA review, and is alleging that impacts are as yet unforeseeable. Neither of these assertions is consistent with CEQA requirements. This expectation is inconsistent with CEQA's requirements and programmatic review of the Santa Paula Branch Line Bike Trail project is legally inadequate.

Rails-with-Trails Configuration Requires Site-Specific Safety Analysis

VCTC has publicly disclosed that this project is a rails-with-trails project, not a rails-to-trails conversion. VC CoLAB understands this to mean that the Santa Paula Branch Line remains in active freight service and that active freight operations will continue and even increase (based upon the lease agreement with the current rail operator) throughout trail construction and operation.

Rails-with-trails configurations present inherent public safety hazards when high-volume recreational trail traffic operates adjacent to active freight railroad operations. VCTC has

indicated anticipated trail use of hundreds of thousands of users every year, which constitutes “high volume” recreational use. Foreseeable hazards include: conflicts at grade crossings where trail users cross active tracks; parallel operation hazards where trail runs alongside tracks with insufficient separation; limited sight distances at curves and agricultural access points; inability of freight trains to stop quickly to avoid trail users; and increased conflict potential as freight operations expand as planned in the lease agreement.

These safety hazards require site-specific engineering analysis to determine sight distances at each crossing location; required warning systems and safety infrastructure; minimum separation distances between trail and active tracks; emergency access for injured trail users; operational restrictions on freight service to accommodate trail safety; and liability allocation among VCTC, Ventura County, and the railroad operator.

A programmatic EIR that relies on standardized mitigation measures cannot address these site-specific safety requirements. Each crossing location has unique sight lines, approach angles, agricultural operation patterns, and emergency access constraints that require individualized engineering analysis and safety design. Under Guidelines §15146, this analysis must be conducted at a project level because the alignment and crossing locations are already defined.

As the lease agreement between VCTC and the rail operator is a known and current condition, the anticipated increase in freight operations must also be analyzed as part of the project's cumulative impacts, not deferred to future tiering documents.

Inapplicability of the 2015 Santa Paula Branch Line Trail Compatibility Survey and Sonoma County Example

VCTC has repeatedly referenced the 2015 *Santa Paula Branch Line Trail Compatibility Survey* to suggest that bicycle trails and agricultural operations are generally compatible. More recently, VCTC cited a planned agriculture-adjacent bike trail in Sonoma County during a December 10, 2025, presentation to the Ventura County Agricultural Policy Advisory Committee (APAC) as further evidence of trail–agriculture compatibility. Reliance on either source is misplaced and does not constitute substantial evidence under CEQA.

VCTC states on its project website that it will “take into account” the 2015 Compatibility Survey as part of the Master Plan update. This language raises concerns that the agency may have predetermined that agricultural impacts will be less than significant without conducting the site-specific analysis required under CEQA. None of the trails evaluated in the 2015 survey, nor the planned Sonoma County trail, reflect current, local regulatory conditions, local agricultural operations, or the specific physical and operational context of the proposed project. As such, neither provides a valid basis for concluding that agricultural impacts associated with the Santa Paula Branch Line Trail can be reduced to a less-than-significant level or feasibly mitigated.

The 2015 survey is outdated and fundamentally inapplicable to the Santa Paula Branch Line corridor. That survey primarily evaluated trail projects located adjacent to agricultural lands, along roadways or buffer areas, rather than trails that bifurcate the interior of active orchard blocks. None of the examples analyzed involved citrus or avocado orchards subject to HLB

quarantine. None addressed fresh-market food safety compliance under FSMA. None evaluated the interaction between 24-hour public access and restricted-entry intervals, buffer zones, or emergency pest treatment requirements. The 2015 survey predates the expansion of HLB and ACP quarantine areas, current CDFA and DPR enforcement practices, wildfire risk reclassification of the Heritage Valley, and the introduction of rail-adjacent recreational uses. Simply put, the assumptions and conclusions in the 2015 survey do not reflect existing local conditions, and VCTC cannot rely on this survey to analyze or mitigate foreseeable impacts to agriculture along the Santa Paula Branch Line.

Similarly, the Sonoma Trail example presented to APAC fails to provide a valid comparison and, in fact, highlights why impacts in Ventura County are materially different and more severe. The Sonoma Trail does not bisect agricultural operations. It runs along major roadways adjacent to vineyards rather than through the interior of orchard and crop production blocks. The agricultural context is fundamentally different, involving wine grapes that undergo post-harvest processing, not fresh-market crops subject to strict food safety controls. The Sonoma example involves crops with short REIs, no HLB quarantine constraints, and an agricultural system designed around agritourism. Importantly, the Sonoma model relies on daily trail closure periods to allow for crop-protection applications; but daily trail closures have not been proposed for the Santa Paula Branch Line trail. Most significantly, the Sonoma trail has not yet been fully constructed. As of the December 10 APAC presentation, no trail sections have been constructed adjacent to active agricultural operations, making any assertion that the Sonoma bike trail can serve as evidence that the proposed management strategies are feasible or effective in practice premature and unsupported.

Under CEQA, an agency may not rely on generalized studies or non-comparable examples to downplay site-specific impacts or to defer meaningful analysis. Where impacts are reasonably foreseeable, parcel-specific, and tied to known regulatory requirements (*as is the case here*), CEQA requires analysis based on current conditions and local circumstances. The agricultural impacts associated with the Santa Paula Branch Line Trail are not speculative and cannot be dismissed by reference to outdated studies or materially dissimilar (and unconstructed) projects.

A new, Ventura County-specific agricultural compatibility analysis, grounded in 2025 regulatory conditions and the actual operational realities of the Heritage Valley, is therefore required to support any conclusions regarding impact significance or mitigation feasibility.

Requested Scope of EIR Studies

The EIR must include the following studies and analyses:

- Site-specific agricultural operations assessment prepared by a California Certified Crop Advisor or equivalent agricultural professional, documenting crop protection schedules, REI requirements, equipment movement patterns, and operational conflicts on a parcel-by-parcel basis

- Biosecurity protocol analysis prepared by or reviewed and endorsed by USDA and/or CDFA, addressing HLB/ACP quarantine compliance, Tau fly vector movement risk, and enforceable contamination prevention measures
- Food safety impact assessment evaluating FSMA compliance risks, third-party audit requirements, and contamination vectors
- Wildfire risk modeling under Red Flag conditions prepared by a qualified fire protection engineer
- Public safety and emergency response analysis documenting response times, communication infrastructure, lighting requirements, and security capabilities for each section of the corridor
- Rails-with-trails safety analysis documenting sight distances, crossing conflicts, and operational restrictions required to protect public safety

The EIR should also assess the feasibility and cost of mitigation measures and evaluate alternatives that avoid agricultural operations and remote corridor sections where impacts cannot be mitigated.

Conclusion

Agriculture is a foundational industry in the Heritage Valley and a critical part of Ventura County's economy, food system, and cultural landscape. The Santa Paula Branch Line Bike Trail proposes to introduce continuous public access directly into the center of that critical industry. CEQA requires a rigorous and site-specific analysis of all associated impacts and feasibility constraints.

VC CoLAB raised concerns about inadequate agricultural outreach in written correspondence to VCTC on December 8, 2025, prior to the scoping meeting. APAC similarly raised concerns regarding inadequate outreach to agricultural stakeholders on December 10, 2025.

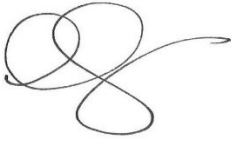
Immediately following the December 11 VCTC public scoping meeting, VC CoLAB again reached out to VCTC to inquire whether property owners and agricultural operators along the mapped alternative routes had been notified. As of the date of this letter, none of these concerns regarding the effectiveness and completeness of VCTC's outreach effort has been addressed.

VCTC should withdraw the current NOP, prepare a revised NOP clearly indicating the intended level of environmental review, and allow all potentially impacted stakeholders adequate time to provide meaningful scoping input based on accurate information about the scope of environmental analysis.

Proceeding with a programmatic EIR under these circumstances (uncertain public outreach and stakeholder noticing and engagement, late disclosure of the programmatic approach, a stated rationale that misunderstands CEQA's requirements, and a project that is sufficiently defined to warrant project-level analysis, with clearly defined and mapped project alternative routes) will produce an environmental document that is legally inadequate, procedurally defective, and incapable of supporting informed decision-making about whether this trail can be safely and lawfully constructed through Ventura County's most productive agricultural corridor.

VC CoLAB appreciates the opportunity to provide these comments and requests that all issues raised in this letter be addressed in full.

Sincerely,

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke extending to the right.

Louise Lampara
Executive Director, VC CoLAB