

**O.P.E.N.**  
**OPEN-SPACE PRESERVATION EDUCATION NETWORK**

A project of the Environmental Defense Center

March 16, 2009

Mr. Derek Johnson, Project Manager  
Santa Barbara County, Office of Long Range Planning  
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**Re: Rural Agricultural Diversification and Intensification Study**

Dear Mr. Johnson:

The following comments are submitted by the Open-Space Preservation Educational Network (OPEN) project of the Environmental Defense Center (EDC) in response to the County's Office of Long-Range Planning addition of the Rural Agricultural Diversification and Intensification Study (Study) to the Office of Long-Range Planning's 2009-2010 Workplan (Workplan) for the Board of Supervisor's (BOS) consideration. The OPEN project does not support the proposed Study given the potential implications it would have on agricultural land conversion (described below). OPEN provides a proactive approach to assessing General Plans, and the planning process throughout Santa Barbara County. The purpose of the OPEN project is to engage all interested sectors of our communities in a dialog about developing policies and programs to protect agricultural and open space lands and the urban-rural interface. OPEN assesses policies and related ordinances as well as local efforts that seek to protect agricultural resources, and monitors County-wide proposals and individual precedent-setting projects with the potential to convert open space and agriculture. This approach includes a comprehensive analysis of policy tools to support the preservation of rural lands and agricultural operations, open space, and the urban-rural boundary. These policy tools can be incorporated into ongoing planning processes, such as during community plan, general plan, and other local policy updates.

The Study was proposed by Commissioner Blau (during prior Planning Commission deliberations on the Workplan) to enable the intensification of use of identified ag-zoned parcels in the County of Santa Barbara, and apparently is a reaction to the proposed Hunter-Purisima Project (to be heard by the BOS on March 24<sup>th</sup>, 2009). The Hunter-Purisima Project proposes a general plan amendment to allow time-share type units on ag-zoned land adjacent to an existing golf course in Lompoc, and would include an 80-room hotel, restaurant-spa, and 85 residential units - all on agricultural land far from any urban center.

Preparation of the Study would be *in lieu of preparing Rural Regional Plans* as is currently proposed in the County's Workplan. The Study would "identify (County-wide)

opportunities to increase agricultural diversification and intensification" and "*identify alternate land uses more appropriate for agricultural parcels*" [emphasis added]. The Study, according to documentation provided by the Office of Long-Range Planning, would review the needs of agriculture and identify ag-zoned parcels which could support agricultural infrastructure or an intensification of agricultural uses. Following the analysis, a series of policy recommendations would be developed.

This hastily crafted proposal does not include any details on the types of “alternate land uses” that would be considered under the Study. Attachment C of the BOS report on the matter was prepared on March 13, *leaving one business day for the public to digest the AAC’s comments on the proposal*. In order for the BOS and the public to fully understand the implications this Study, a detailed description of the types of “alternate” land uses this Study would seek to allow on ag-zoned land must be clearly identified. If this Study is approved as part of the Workplan without the *intent* of the Study being known, it has the potential to squander scarce County funds on a Study that may seek to implement changes that are not approvable under current Agricultural and Land Use Element policies or the approved General Plan. The Study would ultimately identify parcels where these types of “alternate land uses” are allowed, and would likely be a catalyst for the permanent conversion of agricultural land into more intensive land uses that do not support the continued use of these parcels in active agriculture. Since approximately 90% of the privately owned land in Santa Barbara County is governed by ag zoning, this Study could have wide-spread negative consequences on the future of viable agriculture in the County.

Further, the Agricultural Advisory Committee (AAC) recommended that in lieu of the Study, an update to the Agricultural Element should be undertaken. If the AAC cannot support such a Study, and the intentions of the Study are currently unclear, the entire proposal should be removed from consideration in the current Workplan for FY 2009-10.

The OPEN project team appreciates the opportunity to provide comments on the Study proposal, and appreciates the BOS’s consideration of the aforementioned concerns.

Sincerely,

*Via E-mail*

Christina E. McGinnis, OPEN Project Planner