

**SANTA BARBARA COUNTY FLOWER & NURSERY  
GROWERS ASSOCIATION**

September 13, 2010

HAND DELIVERED

Janet Wolf, Chair  
Board of Supervisors  
County of Santa Barbara  
105 East Anapamu Street  
Santa Barbara, California 93101

RE: Coastal Commission Suggested Modifications to County and Montecito Land Use and Development Codes – Carpinteria Valley Greenhouses

Dear Chairman Wolf and Members of the Board:

Upon review of the most recent proposals of the Coastal Commission's suggested modifications to the County's Land Use and Development Codes, three (3) crucial areas have not been examined nor discussed as they relate specifically to the Carpinteria Valley and the County overall.

The first issue relates to the square footage of residential units (**Modification 10**) and/or whether or not the unit is a *principal permitted* use on agriculturally zoned property. There are several subset issues that relate to whether or not the agricultural use is a *principal permitted* use. Most, if not all, property in the Valley is zoned agriculture, along with some properties in the Toro Canyon area. The Coastal Commission staff is insisting that residential units be no larger than 5,000 square feet. This requirement has a number of detrimental effects on existing residential units that are larger than 5,000 square feet:

- The existing unit becomes legal, but nonconforming;
- This reduces the value of the property as that relates to future property assessments;
- This reduces the property tax assessment as a component of revenue to the County;
- This reduces the owners ability to obtain lending;
- Reduces the owners ability to obtain insurance;
- Reduces the owners ability to price the unit for sale.

**The significant point is that any and all residential units over 5,000 square feet on agriculturally zoned parcels throughout the Coastal Zone of the County, immediately become legal, but nonconforming should your Board accept the Modification as proposed.**

One subset issue relates to whether or not properties with greenhouses are designated a *principal permitted* use. It is not clear at this point whether this is the intent of Coastal Commission staff. Numerous owner/operators of joint greenhouses/open field, have their residences located on the same property. The size of commercial greenhouses relates to acreage covered, and it is unclear how a 10,000 square foot limitation can be applied to a primary residence that is one and the same with the commercial operation. This is a capricious and arbitrary standard that has absolutely no relevance to the conduct of either the operation of the facility, or the occupant of the residence.

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A second subset issue affecting housing relates to the prohibition of any structure on a 30% slope. This prohibition is not only problematic for structures in the Valley, but could also affect structures in the Toro Canyon area and elsewhere in the Coastal Zone of the County.

**The significant point of this 30% slope prohibition also renders any structure legal, but nonconforming should the property fall within the prohibition. Should the unit be lost due to an act of God, nature or man, the owner is left with virtually nothing.**

The second issue relates to the intensification of agriculture and the setback requirements (**Modification 9**), as specified by the Coastal Commission staff. Given the numerous creeks, streams and concrete channels in both the Valley and the Toro Canyon area, this is an impossible standard to meet. To require 100 foot setbacks for any commercial operation in these areas could significantly reduce the productivity of the property to virtually nothing. **Again, the consequence to the property owner has a direct correlation to the property assessment value as a component of revenue to the County.** In these two locations specifically, and most likely elsewhere in the County, this is an unrealistic standard. One size does not fit all!

The third issue is equally as alarming and detrimental as the first two issues. **The Coastal Commission staff is dictating full usurpation of the County's authority to establish zoning and land use policy in the Coastal Zone.** Previous Boards on two occasions allowed "the proverbial camel's nose under the tent", when Coastal Commission modifications were accepted on the Carpinteria Valley Greenhouse Plan and the Toro Canyon Plan. Should your Board consent to further intrusion by the Coastal Commission staff to determine zoning and land use, you will have abrogated your duty and responsibility to all of your constituents who reside and do business on agriculturally zoned parcels in the County's Coastal Zone.

Given the stresses and uncertainty of the existing, and quite possibly future, economic times, your Board will be doing a dire disservice to all of your constituents, not just those in the Coastal Zone, should you meekly bow to the dictates of the Coastal Commission staff. You are the elected officials who are answerable to the public and voters. Not the Coastal Commission staff. It is your duty and responsibility to ably defend the right of property owners and voters to conduct business and maintain residences in Santa Barbara County.

Sincerely,

SANTA BARBARA COUNTY FLOWER & NURSERY GROWERS ASSOCIATION



Janice L. Evans, Executive Director

for

June Van Wingerden, President

cc: Board of Supervisors  
M. Brown, Executive Officer, Santa Barbara County  
D. Marshall, County Counsel  
Glenn Russell, PhD., Director, Planning & Development

Page 3

Coastal Commission Suggested Modifications to County and Montecito Land Use Development Codes – Carpinteria Valley Greenhouses

K. Campbell-Bohard, Chair, Agricultural Advisory Committee  
R. Quandt, Grower-Shipper Vegetable Association  
J. Armendariz, Santa Barbara County Taxpayers Association  
A. Caldwell, COLAB  
K. Cronquist, Exec. Dir., California Cut Flower Commission  
K. Merrill, President, Santa Barbara County Farm Bureau

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