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December 6, 2018

Supervisor Janet Wolf
105 East Anapamu Street
Santa Barbara, CA 93101

RE: AED Ordinance Amendments



Dear Supervisor Wolf,

Thank you in advance for considering my rather late request for a revision to the AED Ordinance Amendments the Board of Supervisors will be considering on December 11, 2018.

I represent a group of people interested in developing a small farm with “eco-village” style housing. Such housing comprises small and affordable individual dwellings clustered together to maximize use of the property for farming, in much the same way that typical agricultural employee dwellings do. It differs, however, from standard agricultural employee dwellings in that only some of the residents would be full-time agricultural employees, while others, like myself, would work full-time jobs unrelated to farming and would only be able to work 10-20 hours per month on the farm. This type of development would not be permitted on any AG-I property under the Ordinance as currently proposed. I’d like to request that you consider adding a possible permit path forward for an agricultural/eco-village use in the AG-I zone.

I understand and agree with your concern about the potential for an AG-I zone property to be completely converted to a residential use and losing the valuable agricultural land to residential development. If a CUP were to be required for an agricultural/eco-village use, the County could require as a condition of approval, that use of the property be predominantly agricultural (e.g. an agricultural preservation easement in perpetuity could be included by the applicants as part of the project description or could be required as a condition of approval).

The Table below is an excerpt from the AED Ordinance that will be before your Board on Tuesday, December 11, 2018. The second Table is my requested addition to the AED Ordinance which would provide a possible path forward for the agricultural/eco-village use.

Permit Requirements and Development Standards for Agricultural Employee Dwellings			CDP Coastal Development Permit MCUP Minor Conditional Use Permit CUP Conditional Use Permit
Zone	Permit requirement	Number of employees	Employment/Location
AG-I	CDP ^{1,2,3}	1-9	Employed full-time in agriculture on the farm(s) or ranch(es) of the owner or operator of the farm or ranch upon which the dwelling is located.
	MCUP	10-19	Employed full-time in agriculture, the majority (51 percent or more) of which occurs on the farm(s) or ranch(es) of the owner or operator of the farm or ranch upon which the dwelling is located.
	CUP	20 or more	No restriction on location of employment.
AG-II	CDP ^{1,2,3}	1-24	No restriction on location of employment.
	CUP	25 or more	
M-CD	See Section 35-87.		
M-CR	See Section 35-92.		
TC	See Section 35-93.		
All other zones where allowed by Division 4, Zoning Districts	MCUP	1-4	Employed full-time in agriculture on the farm or ranch upon which the dwelling(s) is located.

- ¹ Projects with a water system with 2 to less than 200 connections will also require a MCUP and may be subject to environmental review. (See Section 35-147.2.)
- ² Projects within a Special Problems Area with and onsite wastewater treatment system, including a dry well, will also require a MCUP and may be subject to environmental review. (See Section 35-147.2.)
- ³ Projects with an individual alternative onsite wastewater treatment system will also require a MCUP and may be subject to environmental review. (See Section 35-147.2.)

Proposed addition to AED Ordinance:

Permit Requirements and Development Standards for Agricultural Employee Dwellings		CDP Coastal Development Permit MCUP Minor Conditional Use Permit CUP Conditional Use Permit	
Zone	Permit requirement	Number of employees	Employment/Location
AG-I	CUP	1 or more	No restriction on hours of employment

Thank you for your consideration of this matter. Please contact me either by phone or email with your thoughts or comments. If there is time, I would like to discuss this in person either on Friday, December 7th or Monday, December 10th.

Sincerely,



Kathy Allen