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Associates

AGRICULTURAL AND ENVIRONMENTAL CONSULTANTS

July 5, 2010

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Offices in
Santa Barbara
Mammoth Lakes

Santa Barbara County Board of Supervisors
105 E. Anapamu Street, Fourth Floor
Santa Barbara, CA 93101

**Subject: Proposed Amendments to the Coastal Land Use And
Development Code/July 6, 2010 Board Hearing**

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Dear Honorable Supervisors:

For the past 40 years, I have had the opportunity to work with ranchers and farmers, and to assist federal, state, and local agencies in the preparation of agricultural and environmental resources studies. My experience includes working in all of the coastal counties of California with special focus on the central coast and Santa Barbara County. I have prepared extensive adaptive agricultural and resource management plans and studies for large ranches and public agency holdings on over 130,000 acres within the coastal zone of Santa Barbara County. I have also assisted the county of Santa Barbara in the preparation of their agricultural land use/agricultural planned development ordinances, and the city of Santa Barbara in their agricultural uses and municipal codes; and have worked extensively with conservation organizations in formulating conservation easements on working ranching and farming properties.

In the last 40 years, Santa Barbara County agricultural commodities production have changed considerably, with a continued shift to potentially higher income crops such as avocados, flowers, miscellaneous fruit and nut crops, and row crops from more traditional cattle & calves, rangeland, and dryland hay, grain, lemon, and bean crops that is especially apparent in south Santa Barbara County while winegrapes have had the largest acreage increase primarily in the north county. As evidenced historically, as well as day to day, ranchers and farmers must be able to adapt both seasonally as well as over time to climate and market changes without government regulations that hinder the choices of rangeland and cropland intensification decisions that oftentimes must be made over a very short time frame of a few days.

Especially troubling are the following California Coastal Commission staff recommendations that could have a significant deleterious impact on Santa Barbara County coastal agricultural operations and viability.

Santa Barbara County Local Coastal Program Amendments 1-09-A and -B shown on Pages 94 and 95 of the staff report (Proposed Modification #9) whereby:

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"New or expanded areas of agricultural activities are not exempt and require the issuance of a Coastal Development Permit"

and

"Grazing... located in existing areas where the use does not increase the intensity of use"

New uses could presumably include a change from grazing to cropland (or vice versa), or changes from one crop type to another that would require a Coastal Development Permit. This modification just does not work. Santa Barbara County agriculture works because operators have the flexibility to choose optimum crops types based on challenging climatic times of drought, water costs, market trends, and high land costs. Simply put, crop type choices often must be made on the spur of the moment and cannot wait for a permitting process to occur. Additionally, crop rotations and multi-cropping are often done on three-year or longer intervals which would create confusion in the permitting process and enforcement as to what is "new" or "expanded" areas.

Expansion of grazing areas into fallow cropland, range improvement land, prescribed burn areas, or into ungrazed areas after a wildfire could trigger a Coastal Development Permit requirement. Would the extensive chaparral of the front country recent wildfires, if within the coastal zone, require a Coastal Development Permit in order to graze to help reduce future fuel build up and subsequent fire hazards?

Lastly, how is intensity of grazing use defined? Typically a grazing operation will vary intensity yearly either by increasing or decreasing the number of grazing days or by increasing or decreasing the number of animals grazed based on rainfall amounts and distribution, and temperatures. One rainstorm can change the intensity of grazing where decisions must be made immediately to procure or sell cattle. A Coastal development Permit process just cannot react to the ranch operator in any kind of a reasonable time frame thus creating real viability concerns that could lead to economic disaster.

Additional possible coastal commission actions that will reduce agricultural viability include the following:

- Public trail siting that if improperly done, can have devastating operational impacts;
- Permit costs resulting in critical operational delays and added operational costs; and



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- Creating an added permit burden that is counter to the trend of streamlining permitting of agricultural projects, especially those projects that have a habitat restoration or enhancement component.

Agriculture should not have to meet the same permitting standards as "development".

Thank you for the opportunity to comment, if you have any questions, please do not hesitate to contact me at Sage@silcom.com.

Sincerely:

Orrin Sage

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