

Lenzi, Chelsea

From: Lisa Bodrogi <lisa@cuvee.me>
Sent: Friday, November 04, 2016 2:03 PM
To: sbcob
Subject: Gaviota Plan Hearing
Attachments: LtrtoBOS11.4.16.docx

Please see that the enclosed letter is submitted to the Board of Supervisors for their hearing on Nov. 8th on the Gaviota Plan.

Kind regards,

Lisa Bodrogi, Principal & Owner



Land Use Planning & Public Relations
PH: 805-937-8474 Cell: 805-260-2461
<http://cuveeconnections.net>

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Santa Barbara County
Board of Supervisors
123 East Anapamu Street
Santa Barbara, California 93101

via e-mail to: sbcob@co.santa-barbara.ca.us

November 4, 2016

RE: Gaviota Coast Plan

Dear Chairperson Adam and Members of the Board:

I appreciate the efforts to develop a plan for the Gaviota Coast to protect the natural and manmade resources of one of the last remaining working agricultural landscapes in Southern California. The Gaviota Coast in Santa Barbara County is a spectacular landscape composed of agricultural, biological, cultural, recreational, and scenic resources. The Plan Area, comprised of approximately 158 square miles (101,199 acres), is located entirely within the rural area.

The magnitude of your task to adopt the plan cannot be overstated. Adoption of the Gaviota Coast Plan will have far-reaching implications for generations to come which makes the review and approval process critically important. Residents and landowners within the plan area have spent entire lifetimes managing and caretaking of these magnificent lands and the last seven years developing a plan based upon their inherent knowledge of the land and its stewardship.

Many of those who have participated in the plan have expressed frustration that their ideas and concepts were changed by staff and further altered by the environmental review process. These comments are reminiscent of comments reported in the Agricultural Resources Environmental/Economic Assessment (AREA) Study.

This study was prepared by the American Farmland Trust, a private, nonprofit conservation organization founded in 1980 to stop the loss of productive farmland and promote farming practices that lead to a healthy environment. The purpose of the AREA Study was to show the value that agriculture brings to Santa Barbara County's environment and economy in order to establish a baseline for consideration in addressing competing resource issues.

Lisa Podrogi
Principal & Owner

PH: 805-937-8474 • Cell: 805-260-2461 ~ Lisa@cuvee.me • www.CuveeConnections.net

A copy of the study can be found at the Farmland Information Center (FIC)¹:

<http://www.farmlandinfo.org/santa-barbara-county-agricultural-resources-environmentaleconomic-assessment-area-study>

For your convenience, I have attached the last several pages of the Conclusions and Recommendations portion of the AREA Study.

In review of the Draft Gaviota Plan, while there are allowances and provisions for activities such as expanded Agricultural Processing Facilities, Farm Stands, and Farm Stays, there needs to be a conscious examination of the process and procedures that are required for these types of activities to occur. If the fees and requirements to get approval to operate a facility are greater than the potential income to be derived, there is a problem. While an activity may be characterized as “exempt” or a “categorical exclusion”, if the requirements are too onerous to qualify, the exemption becomes meaningless. For example, how likely is it that a facility will not need to construct a building or install a water or septic system?

County regulations that inhibit agricultural expansion or unnecessarily limit intensification threaten the viability of the entire agricultural industry. Given agriculture’s importance to both the economic and environmental health of the County, it makes sense to support it with policies, programs, and a regulatory process that help balance agricultural development with competing resource needs for urbanization and environmental preservation.

Due to the significance of agriculture to the county’s overall economic vitality and to the extent to which the Gaviota Plan affects agriculture, a more thorough evaluation, one that looks at the plan from an economic development strategy perspective, is essential before the plan is considered for adoption.

An Economic Development Strategy could evaluate an incentives program that is financially, operationally, or management based that assists landowners in best management practices in conservation and stewardship of their resources, whether natural or agricultural based. An analysis of the potential benefits or impacts the plan may have on the county’s overall economic fitness should be conducted. It is necessary to ascertain concerns that the restrictions and limitations contained within the plan will impede agricultural production by adding unnecessary costs and further liabilities to agricultural operations.

I urge the Board of Supervisors to listen to the issues and concerns raised by the landowners and stewards of the Gaviota Coast and take positive steps to plan *for* agriculture, and not just to use it to accomplish open space and recreational goals. Policies must be created that not only support agricultural land protection on par with environmental resource protection, but also the business climate and infrastructure required to sustain agriculture into the future.

¹ The Farmland Information Center (FIC) is a clearinghouse for information about farmland protection and stewardship. It is a partnership between the USDA Natural Resources Conservation Service (NRCS) and American Farmland Trust (AFT), authorized by the federal Farmland Protection Policy Act (FPPA).

Sincerely yours,

Lisa M. Bodrogi

Expert in Land Use Planning & Public Relations

PH: 805-937-8474 Text: 805-260-2461 or E-mail: lisa@cuvvee.me

Taken from the Santa Barbara County AREA Study written by AFT published November 2007:

Conclusions and Recommendations

SANTA BARBARA AGRICULTURE IS AT A CROSSROAD

Santa Barbara's ability to adapt to urban influences depends on two major factors: producers' willingness to change and their ability to change, which is mostly influenced by land use and environmental policies. A key part of AFT's research process was to hold a series of focus groups with about 50 representative farmers, ranchers and industry leaders in key commodity sectors to ground truth data gathered in other parts of the project, to find out how producers in leading commodity sectors perceive the current state of County agriculture, and to understand threats and challenges that affect its future sustainability. For more information on individual sectors, see the Commodity Briefs included in Appendix VI.

The focus groups were an important component of the research process. Because the sessions were confidential, producers were candid and forthcoming, and provided valuable local perspective and wisdom. In terms of willingness to change, all the producers and industry leaders who participated in the focus groups indicated that they want and need agricultural intensification and expansion. However, the single overarching issue raised in the focus groups was that producers believe they are overly restricted by the County staff interpretation of key policies including the Endangered Species Act, the Grading and Oak Tree ordinances, and the Uniform Rules.

It did not appear that producers opposed these policies per se, but rather the way they are administered. Regardless of factors such as commodity sector, size of farm, location, age of producer and so on, farmers unanimously expressed frustration with the County's business process, which they report leads to excessive time and expense in permitting and inconsistent interpretation of the Uniform Rules. For example, one vegetable producer described "doing it by the book" to acquire permits for a cooling system. He said, "We did it right, two years later we don't have the permits yet, but Driscoll came in after and in 18 months theirs is up and another guy expanded his without permits and it's all done" Such comments were not confined to vegetable growers. Comments from all sectors can be summed up by a cattle producer who said that the County's land use permitting process has become "tantamount to a conditional use permit." Or as a nursery operator explained, "It's as if the policy makers are operating under a political environment that's completely disconnected from the business environment. They're using agribusiness to accomplish open space goals."

One way to resolve this would be to streamline the permitting process to balance the County's agricultural and environmental priorities. For example, a San Francisco-based nonprofit organization called Sustainable Conservation helped establish a permit streamlining "one-stop-shopping" application process to provide an incentive for local farmers to implement NRCS and Monterey County Resource Conservation District plans for the Elk Horn Slough Watershed Project. The process allows farmers to comply with all permits required for erosion control and natural habitat improvements by working through a single agency (in this case, NRCS), in return for implementing best management plans. Recently, Sustainable Conservation secured funding for a pilot project called the Northwest San Diego County Permit Coordination Program. The focus of this project is to streamline permit coordination by the RCD for nine NRCS practices that promote water quality and habitat enhancement.

Santa Barbara agriculture is at a crossroads. Its future depends, at least in part, on how well the County manages the rural-urban interface. Based on input from focus groups, individual interviews and meetings with the AAC and County staff, AFT has concluded that there is

considerable misunderstanding and miscommunication between County planning staff and the agricultural community. As one focus group participant admitted, because farmers tend to mind their own business, they have not been sufficiently involved in public policy and planning processes, which now are dominated by urban interests. According to producers, the result is legislation created by “people who’ve never set a foot on a ranch and think they’re doing the right thing but actually are working in the wrong direction.”

In general, producers reported that, except for the tight land market, agronomic conditions are adequate for intensification and expansion. However, necessary agricultural support infrastructure is absent or lacking. Since they report that neighboring counties have more favorable policies and provide more support to agriculture, farmers and ranchers truck their products north or south to take advantage of infrastructure for packing, processing and adding value. As transportation costs go up, this will become an increasing threat to the sustainability of Santa Barbara agriculture.

Based on the consistency of producer comments, it appears that the County has begun to employ an urban planning process to agriculture, treating agricultural improvements as new developments, regardless of scale. In every focus group, growers reported occurrences where obtaining permits even for small improvements took months or years, involved excessive permitting costs, or required them to bear the financial burden of creating buffers and other installations to mediate conflicts with new non-farm neighbors. While each of their stories is anecdotal, the weight and unanimity of the evidence is impossible to ignore.

To better understand these issues and determine what changes could be made to improve the outlook for agriculture, the County could hold facilitated listening sessions with producers to get the feedback AFT got from the focus groups. This would help County planners and officials gain a deeper understanding and appreciation of the complexities of commercial agriculture and help them determine what changes need to be made to improve specific policies to make them more supportive of agricultural intensification and expansion. They could use this input as the basis of an audit of specific policies and of their business process generally.

RECOMMENDATIONS FOR CONTINUED SUCCESS

As Santa Barbara continues to transition from a traditional agricultural economy to one that is urban-influenced, producers must further intensify production, continue the trend toward higher value crops and value-added, and improve public relations. To position the industry for future success, the County should analyze its business process to identify whether or not policies are being interpreted consistently and whether or not they support agricultural intensification and expansion. Permitting should be streamlined, and policies be created to encourage the creation and improvement of necessary infrastructure to add value, for example, by cooling, storing, packing and processing vegetables; expanding greenhouses; or building tasting rooms. It does not serve the County economy any better than it serves agriculture to have farmers and ranchers ship their products to neighboring facilities to add value to their products.

In addition, the County should explore economic development strategies for agriculture. The County could take the lead in developing local food systems and support direct marketing to supply the burgeoning demand of Locovores, support the development of specialty products and ways to bolster cattle producers by allowing them to diversify into higher value enterprises such as wine grapes, horses and nature-based agritourism. Furthermore, as consumer preferences change

Conclusions and Recommendations

toward more convenience foods, Santa Barbara producers need additional cooling and processing plants and facilities to package ready-to-eat produce to meet market demand. An economic development strategy would help the County re-engineer its business process to be flexible enough to allow for this kind of diversification, which might require changing the definition of agricultural commodities to allow horses or the introduction of recreation or guest ranches. For agriculture to survive in a context of urban land values and housing costs, the County must reinterpret existing policies and develop new ones to support retail and value-added agriculture as well as commodity-based wholesale agriculture.

County regulations that inhibit agricultural expansion or unnecessarily limit intensification threaten the viability of the entire agricultural industry. This is especially true of grazing land. If it is no longer affordable to manage the land for agriculture, it is likely to be converted to rural sprawl and ranchette development. Without opportunities for grazing operations to diversify and adapt their agricultural production to compete with urbanization, it is likely they will be abandoned, shifting the responsibility of maintaining biodiversity, wildlife habitat and fire suppression to local, state or federal government agencies.

Another way to position agriculture for success would be to simultaneously steer development away from important farmland and to create policies to keep those lands in agricultural production. Policies could include purchase and transfer of development rights programs, mitigation, creating agricultural enterprise zones or requiring developers to pay for buffers between new homes and active farms. Toward that end, important farmlands should be considered environmental resources when interpreting environmental conditions for agricultural expansion or intensification and encourage wine grape and other crop expansion onto grazing lands.

Given agriculture's importance to both the economic and environmental health of the County, it makes sense to support it with policies, programs and a regulatory process that help balance agricultural development with competing resource needs for urbanization and environmental preservation. Before this can occur, it is clear that communication must be improved, trust rebuilt and policies created that not only support agricultural land protection, but also the business climate and infrastructure required to sustain agriculture in the future.

Understanding agriculture's economic and environmental importance is the first step. It is hoped that the information provided in this report will help improve the dialogue between the County and the agricultural community so that progress can be made not only to preserve the land base but also to support this vital economic sector. Further research is suggested to help answer some questions that were beyond the scope of this project and lay the groundwork for the planning and policy work that remains to be done.

This is a critical time for Santa Barbara agriculture. It faces both great opportunities and threats. To realize the opportunities and mitigate the threats, the County and the agricultural community must start working together. The data presented in this report will not solve the problems. The County must listen to the issues raised by farmers and ranchers and take positive steps to improve the business climate. With better communication and trust, the County, the agricultural community and other stakeholders can work together to plan *for* agriculture, not just around it.

RECOMMENDATIONS

1. Create policies and programs to protect important agricultural resources, especially lands classified as important farmlands. Programs could include a purchase of agricultural conservation easement program, a transfer of development rights program, greenpayments and/or a mitigation program, as well as steering growth away from important agricultural lands and limiting the extension of public infrastructure to important agricultural regions.
2. Streamline the permit approval process, educate County staff about agriculture and provide guidelines to expedite interpretation of standard rules. Develop protocols for automatic approval of some kinds of projects.
3. Update projections on the rate and location of growth in the County and map them to show how much of the growth will occur on important agricultural lands, and at the same time analyze water availability and costs, especially in areas identified as potential for agricultural expansion.
4. Conduct further analysis on the agricultural suitability of the land that has been identified as available for agricultural intensification and expansion and create a strategic farmland map that shows water resources and development pressure to focus attention on what agricultural resources to protect.
5. Create a plan for agricultural intensification and expansion that builds off the natural resource and development pressure factors identified in the strategic map and that includes land use, economic development and environmental components.
6. Conduct further studies of key factors affecting County agriculture, such as:
 - Emerging markets, the potential to develop a regional food system and case studies of how other areas are taking advantage of Locovores and other new market opportunities.
 - Agricultural input and output costs (after the 2007 *Census of Agriculture* is published).
 - Labor housing availability, where agricultural labor actually lives, affect on traffic of labor commutes, and what could be done to alleviate costs.
 - The effect of global markets on key commodities, such as avocados, flowers and wine grapes.
7. Analyze the County business process for regulating agricultural operations to identify where governmental regulations impede intensification and expansion, or make it uneconomical. As part of this study, analyze comparable agricultural policies and the costs of doing business in neighboring counties such as San Luis Obispo and Ventura, and analyze specific policies that have been deemed onerous to agricultural expansion and intensification in Santa Barbara including:
 - Grading Ordinance
 - Uniform Rules
 - Greenhouse Ordinance
 - Permitting process for labor housing