

COALITION FOR SUSTAINABLE AGRICULTURE AND RESTORATION



**To: California Coastal Commission
Santa Barbara County Board of Supervisors**

From: COALITION FOR SUSTAINABLE AGRICULTURE AND RESTORATION

Re: LUDC update for County of Santa Barbara

November 8th, 2010

Honorable Commissioners and Supervisors,

We are writing in regard to the proposed Land Use Development Code update taking place in Santa Barbara County.

Let us first start by noting our strong support of the intent and value of California's Coastal Act. The Act continues to play a critical role in the protection of our precious coastal resources. During the last ten years there have been significant changes taking place in agriculture in response to not only the failings of past agricultural models, but additional factors such as globalization, energy price increases, rising real estate prices and new demand for organic, local products. In short, agriculture has been forced to re-examine its modus operandi. Further, with a widely recognized need for all land use patterns to be re-examined in the face of global climate change, relocalization of agriculture is playing a critical role in not only reducing the carbon footprint of our food systems, but creating land use practices that improve carbon sequestration and, increase natural habitats while continuing to provide healthy food to our local communities.

We urge you to take note of the tremendous potential in these changes to benefit our Coastal communities and resources.

A New Era in Farming: While we are awash in stories of family farms failing due to economic pressure, stifling regulation or lack of interest, many farmers are bringing new ideas to the agricultural community under the banner of 'sustainable/organic agriculture.'

Organic Agriculture: The organic industry continues to explode, as consumers increasingly demand all things more holistically produced food and products. The reduction or elimination of pesticides and inorganic fertilizers is an important part of the future of agriculture and a healthier coastal environment.

Land Stewardship: There are powerful innovations in land stewardship techniques that focus on natural methods of improving soil health and biology. Efficient rain water utilization, water

run off systems, carbon sequestration, harvesting the power of the sun, improving habitat and holistic rangeland management are but a few of the ways this innovation is taking place.

Re-localization: The cascading benefits of re-localizing and strengthening our local food systems are innumerable: healthier food, stronger and more resilient economies, better food security, the building of community relationships, reduction of food's carbon footprint and more accountability over the health of our natural environment.

Habitat Restoration: Restoration has proven to be critical to almost ANY agriculturalist focused on long term, stewardship of their land. Regenerating and restoring our landscapes is a far better option than "sustaining" an already damaged environment.

The proposed changes to the LUDC:

While the intention of the LUDC update is honorable, we believe that some of the modifications being proposed by the coastal commission staff stifle innovation in agriculture and habitat restoration when it is needed most. We believe that the Coastal Commission and Coastal Counties should be encouraging and facilitating sustainable agriculture, not adding new burdensome, and often, unrealistic requirements for agriculturalists and restoration projects.

At a time when we should be catalyzing fundamental changes in our food and land use systems to encourage sustainability and increase the visibility of sustainable actions, the proposed modifications will drive restoration and sustainable agriculture further underground as farmers and property owners try to avoid expensive and burdensome regulations.

It has been stated that one of the benefits of the suggested modifications is to improve public participation. While we agree that public participation in the permit process is a benefit, we feel strongly that we must balance the desire for oversight with our desire for habitat restoration and our need for farmers and agricultural operators to be able to make decisions on a day-to-day basis. The increased time and cost of processing agriculture and restoration permits as a result of the proposed modifications is directly counter to the direction we should be moving towards, and threatens to undermine restoration activities and sustainable agriculture. The result will be the creation of an uneven playing field where only major agricultural operations and corporations can participate in permitting processes, ignoring the larger fundamental threats to our environment including climate change, food insecurity, and agricultural chemical dependencies, to name a few.

The suggested modifications, to a large extent, reflect a dated approach to environmental protection based on regulation and lengthy processing instead of profiling, promoting and facilitating innovations in sustainable land use practices critical to the protection of our coastal resources and beyond.

We are aware of and share the Commission's concerns about misuse of regulatory flexibilities done in the name 'restoration' or 'stewardship.' However, the Commission's response to these concerns must be measured so as to allow for and support resource-beneficial activities that enhance Coastal resources.

We are requesting that the Coastal Commission consider the following principles in their policy making process for the current LUDC updates and ALL future policy making:

- **Soil fertility and health:** Promote the land stewardship practices that naturally increase soil fertility and health including compost, mulch, compost tea, cover cropping.
- **Water conservation:** Promote practices that increase the capture of rain water and recharge aquifers including keyline plans, water catchments in upland environments and the general practice of "slow it spread it sink it" over and above channelization, focusing and removal of water off the site.
- **Holistic rangeland management:** facilitate cattle grazing practices that increase soil health, help restore grasslands and mimic the natural relationship between grazers and grasslands.
- **Habitat Restoration:** Genuine habitat restoration can be an important land management technique in ALL zone districts. Land use technology, science and practice should facilitate improvements to natural habitats and soil health and decrease loss of top soil.
- **Reduction and/or elimination of synthetic chemicals in agriculture:** Although terms like 'organic' or 'natural' are becoming loaded words, most reasonable people agree that reducing agriculture's dependency on chemicals is an imperative. Such a change not only improves agriculture's relationship to the natural resources of the land, such as protecting clean water and the food web, but also generates healthier food and decreases health risks for farmers and their workers.

We encourage the Coastal Commission to analyze the potential unintended consequences of the proposed modifications to our LUDC, and to examine a new way of enacting the values of the Coastal Act. For years, public policy has focused on creating more laws and regulations with the "bad apple" mindset. Practically, this means that people hold up one example project that has had terrible consequences. Policies are then created around this 'bad apple' that often unintentionally eliminates numerous beneficial/good projects.

Given the immense challenges facing our coastline and state, this 'bad apple' form of policy making is proving antiquated and stifling to the critical evolution of sustainable land use practices in the coastal zone. We hope this discussion and examination creates a new and exciting opportunity for the Coastal Commission to facilitate deep and lasting sustainable land use changes in the Coastal Zone instead of just stopping bad projects at the cost of so many good projects.

We encourage the Coastal Commission to do the following:

- Certify the reformatted LUDC without the agricultural and restoration related modifications, allowing further analysis of these important issues.
- Remove the suggested modifications related to agriculture and restoration from the LUDC certification process
- Commission a white paper on sustainable agriculture and land use practices in the Coastal Zone.

- Analyze policy options that facilitate and promote sustainable agricultural and restoration practices in the coastal zone.
- Encourage local jurisdictions to include those policies in future LCP Amendments as part of their local planning processes with those policy options in mind, in an effort to incentivize and increase sustainable agriculture and restoration in the Coastal Zone.

We appreciate your consideration of our request.

Sincerely,
Coalition of Sustainable Agriculture and Restoration

/s

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 Oscar Carmona, Healing Grounds Nursery
 Megan Carney, on behalf of Santa Barbara Food Policy Council
 Lee Chiacos, Landscape Designer
 Yvon and Malinda Chouinard, Founders, Patagonia, Inc.
 Dr. David Cleveland, Professor of Environmental Studies, UCSB
 Anne Coates, Land Use and Conservation Consultant
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 Barbara J.D. Davies, International Horticultural Consultant and Educator
 Donald Davis, Owner/Grower, Certified Organic Avocados
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 Susan Green, Local and Organic Food Activist
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 Elizabeth LaCaze, Local Food and Restoration Supporter
 Chris Lima, Fisheries Biologist

Chris & Carla Malloy, Sustainable Ranchers
Dan Malloy, Sustainable Rancher
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Joe Morris, Founder, Central Coast Rangeland Coalition/Owner, Morris Grassfed Beef
Jeff Nighman, Santa Barbara Natives, Inc.
Ken Owen, Channel Islands Restoration
Kevin Peterson, Irrigation Consultant
Wes Roe co-founder, Santa Barbara Permaculture Network
Jim Roehrig, Founder, Backyard Bounty
Daphne Romani, Permaculture Designer, aspiring young farmer
Carla Rosin, Santa Rosa Hills CSA
Michel Saint-Sulpice, Architect / Permaculturist
Lawrence Saltzman, Permaculture Guild of SB
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