

Katherine Douglas

Public Comment - Group 1

7



From: Michael Gordon <bmgmike@mac.com>
Sent: Saturday, November 2, 2024 12:54 PM
To: Laura Capps; Supervisor Das Williams; Joan Hartmann; Supervisor Nelson; Steve Lavagnino
Cc: Villalobos, David; sbcob
Subject: Agricultural Enterprise Ordinance

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Santa Barbara County Board of Supervisors

RE: Nov. 5, 2024 Departmental Agenda Item 7. Agricultural Enterprise Ordinance

Dear Honorable Supervisors

I am a 20 year resident of Santa Ynez and live adjacent to Buttonwood Winery. I am also an owner of two popular restaurants in Santa Ynez and Los Olivos

I support and encourage tourist visits to our wonderful wineries for the purpose of wine tasting and experiencing the growing, harvesting of grapes and the production of our excellent wines. The addition of small items of food to accompany the wine sampling makes perfect sense.

However my understanding of the Agricultural Enterprise Ordinance before the Board seems to conflict with its intended purpose and the needs of the county's residents

My reading of the Ag 2 zoning and the Agricultural Enterprise Ordinance is that the county's goals are to

- Provide for more recreational activities
- Provide for more overnight accommodations
- Assist farmers to maintain the agricultural nature of their property and be able to keep the farms financially viable

Therefore farming activities must be the major enterprise and in order to provide additional revenue the owners may

Introduce activities such as short term stay

hiking and equestrian trails

- food and beverage
- educational
- events - weddings, concerts
- and related activities under the general definition of agricultural tourism

These additional activities must be "ancillary and supplemental" to the activity of farming "allow a variety of uses that would be incidental to, and compatible with, agricultural uses on lands zoned Agricultural II (AG-II) countywide, and that would support and encourage the continuation of

farming and ranching on agricultural lands. The **primary use of the land must continue to be agriculture** (e.g., crop cultivation, ranching/grazing)".

what does this mean?

how many events will be allowed

how many guests at one time

how long may guests reside on the property

will the updated EIR cover these activities regarding

Water

Sewage

how will compliance be enforced?

"Depending on the size and intensity of the use and compliance with development standards, some uses might be allowed without a permit (Exempt), or be allowed with a Zoning Clearance or **Land Use/Coastal Development Permit** (tiered permitting). These uses, if larger or more intensive, might also be allowed with a **Conditional Use Permit**."

What does this mean?

What are some examples of acceptable permit applications?

Will this ordinance only apply to existing owners or also subsequent purchasers of the farm?

Will it also apply to **professional hotel developers** who might purchase the farm with an intent of applying for various land use and conditional use permits

such that the scope of development would exceed the AG 2 restrictions without zoning change ?

Will applications for zoning changes from AG 2 be accepted, and if so, under what conditions?

Thank you for considering the above at your meeting November 5, 2024

Sincerely,

Michael Gordon
Toscana Restaurant Group
310-266-7618
bmqmike@mac.com

Katherine Douglas

From: Global Gardens <theo@globalgardensonline.com>
Sent: Sunday, November 3, 2024 11:15 AM
To: sbcob
Subject: Ag enterprise comments

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Hello!

I am Santa Barbara's first extra virgin olive oil producer, having planted 2000 olive trees in Santa Ynez in 1995. I am currently harvesting about 13k olive trees in the region and now making over 50 food products with local produce under the brand name Global Gardens.

Everyone talks about how expensive residential rates are. Commercial rates have been unsustainable since Sideways exploded tourism in the region (all businesses love and need the high tourism, I'm just making a time reference with the movie date of 20 years ago). Rents are now completely out of control for business establishments and we need to diversify our revenues.

Yearning to complete my vision of creating a wellness center for the region where people can come learn about food as medicine with olive oil as the center point, I am in escrow on an Ag 1-20 lot on Alamo Pintado Rd. In my budget projections for year 2 I am hoping for the approval of 3 tiny homes (less than 120sq ft each) to create farm stays, extending the learning of the sustainability of living on a small farm. This is integral to my paying for the land which in our region has become out of reach for us small farmers. Over 200 olive trees and various California pollinator habitats are planned. This opportunity already exists in all of Europe. Especially here in Santa Ynez where prices are so high and the weather near perfect for such a concept, I beg the supervisors to pass this ordinance immediately and not politicize the situation any longer. I can't believe it hasn't been done yet as we've been meeting and discussing this since way before Covid was a possibility.

Please consider us working farmers and lovers of our local, productive, beautiful land. Help us to survive in what we love to do~in my case it is yielding the best olive oil from my property as well as educating the public and also having a space for a Cal Poly or Alan Hancock agricultural intern to live and learn by my side.

I appreciate your consideration. Please confirm receipt of my letter.

Theodora Stephan, owner,



Katherine Douglas

From: Ballard Adobes <ballardadobes@gmail.com>
Sent: Sunday, November 3, 2024 7:31 PM
To: sbcob
Subject: Public Comment letter for 11/5/2024 Board of Supervisors Hearing
Attachments: PMR Nov5 AEO ltr to SBC BOS.pdf

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Please circulate the attached letter to the Supervisors and include it in the public record as a public comment on Agenda Item #7 (Agricultural Enterprise Ordinance) for the Board of Supervisors November 5, 2024 hearing.

Thank you. Please contact me if you have any questions or problems with the document.

--Paul Rohrer

The Rohrer Family



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November 4, 2024

Recording Secretary
Santa Barbara County Board of Commissioners
c/o Planning and Development, Hearing Support
123 East Anapamu Street
Santa Barbara, CA 93101
VIA EMAIL TO: sbcob@co.santa-barbara.ca.us

RE: 11/04/24 Departmental Agenda Item 7. Agricultural Enterprise Ordinance

Dear Honorable Commissioners:

While, in general, an expansion of winery uses, artisanal onsite processing, and small-scale farm stays is a great idea with wide community support among agriculturalists, the particular Agricultural Enterprise Ordinance (“**AEO**”) puts hospitality enterprise before farmers and agriculture.

As this letter will demonstrate, both the Environmental Impact Report (“**EIR**”) supporting the proposed AEO and the Statement of Overriding Consideration (“**SOC**”) are legally deficient and cannot be adopted or certified as drafted.

Consequently, we respectfully request that the Board vote to both (a) return the proposed ordinance to Staff and the Planning Commission for further consideration, and (b) revise the EIR as legally mandated. Finally, even if the Board elects not to revise the proposed ordinance and the EIR (which we do not recommend), we strongly urge the Board to recirculate the revised EIR, because its revisions require recirculation under state law (see, Cal. Code of Regs. §§ 15088.5(a)(3) and (g).

RECIRCULATE THE EIR

As the Lead Agency, the County must recirculate an EIR when changes are made to a project, in order not to deprive the public of a meaningful opportunity to comment upon:

- “a substantial adverse environmental effect of the project,” or
- “a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.”

Cal. Code of Regs. § 15088.5(a). Moreover, “[a] decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.” CEQA Guidelines § 15088.5(e).

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Here, October 2024 revisions (Revision Document (“RV01”)) to the EIR (23EIR-0003) for the AEO project introduce both of the foregoing circumstances, but the revisions in **RV01 were not circulated to the public for consideration or comment**. Such re-circulation is necessary and required.

A. Substantial Adverse Environmental Effect

First, RV01 reflects an **increase in the allowances for AEO campgrounds, farmstays, and daily attendees of small-scale events** on all AG-II parcels in unincorporated Santa Barbara County. In February 2024, the EIR found that the environmental impacts from the increased traffic generated by the level of AEO activities allowed under the program limits that existed in February 2024 would be **significant and unavoidable**.

Now, the RV01 shows that the “revised intensity levels” for AEO campgrounds, farmstays, and daily attendees of small-scale events will result in an estimated **12.3% increase in traffic** (referred to as “vehicle miles traveled” or “VMT”) **over and above the increase already determined to be “significant and unavoidable” in the February 2024 EIR**, and:

[O]perational mobile-source **air pollutant emissions and operational greenhouse gas (GHG) emissions** would **proportionally increase by 12.3** percent **across all pollutants**, including nitrogen oxides (NO_x), reactive organic carbon (ROC), carbon dioxide equivalents (CO₂e), among others.

The original, February 2024 EIR for the AEO expressly admits that all of the foregoing polluting impacts are “**significant and unavoidable**,” and the CEQA Guidelines require recirculation whenever a significant increase in environmental effects arises in a revision to the previously circulated EIR.

Notwithstanding the CEQA Guidelines, RV01 takes the position that recirculation is not required because “[n]o new significant impacts or substantive changes in the severity of the impacts would occur as a result of the proposed revisions to the intensity of campgrounds, farmstays, and small-scale events” and the increase would simply “***remain significant and unavoidable and similar to the impacts described under . . . the Final [February 2024] EIR.***”

That is not an accurate statement of the law or the underlying public policy. Here, there has unquestionably been a significant increase in a significant environmental effect – and the CEQA Guidelines require recirculation – because they do not contain a carve out excepting recirculation when a statement of overriding consideration is being made. The purpose of CEQA is to provide the public, other agencies, and the Board with information; and **failure to recirculate as mandated deprives everyone of such information and the ability to comment**. If the law were as RV01 for the AEO assumes, once a detrimental environmental impact was determined to be significant and unavoidable by a staff member

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or consultant, an agency would have a blank check to continue altering program limits – permitting environmental impacts to grow ever more dangerous and detrimental – without ever giving the public another opportunity to weigh in on when enough is enough.

Instead, under CEQA, recirculation is required because **the public must have a meaningful opportunity to comment** before substantial environmental impacts are introduced into their communities. This is why, where, as here, a change is made to the project prior to certification – including the introduction of additional data or other information – the updated EIR must be recirculated to provide to allow the public an opportunity to review and comment on “a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect.” Cal. Code of Regs. § 15088.5(a).

B. Feasible Mitigation Measure or Project Alternative

Second, RV01 briefly introduces and explains the newly created Limited Agricultural Enterprise (“**LAE**”) Overlay Zone, which will be applied to “historic row/food crop growing regions located east and west of the cities of Santa Maria and Lompoc” to ensure that AEO hospitality uses “do[] not conflict with or result in significant impacts to the surrounding row/food crop agriculture.”

These LEA Overlay zones represent a new and previously unconsidered mitigation measure. While the mitigation measure in and of itself might be beneficial, it opens up questions as to why these specific areas and crops, and not others, were selected for protection. For example, there appears to be no evidence in the administrative record that such LAE Overlay Zones were considered for other historic crops such as flowers, grape vines, and orchards. Moreover, there is no justification for which locations are included and excluded.

This type of new mitigation measure is expressly identified as an example of “[s]ignificant new information” that triggers the recirculation requirement:

A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the proponents decline to adopt it.

Cal. Code of Regs. § 15088.5(a)(3).

Here, the public has not had an opportunity to comment on the applicability of this newly devised mitigation measure (LEA Overlay Zones) to other areas and crops for which an overlay zone has not been adopted.

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Recirculation is required because the public must have a meaningful opportunity to comment both on the above-referenced substantial environmental impacts and these newly introduced, substantially different mitigation measures.

STATEMENT OF OVERRIDING CONSIDERATIONS IS LEGALLY DEFICIENT

A SOC is a written explanation of specific reasons, supported by substantial evidence in the record, that:

- social,
- economic,
- legal,
- technical, or
- other beneficial aspects

of a proposed project outweigh the project's unavoidable adverse environmental impacts. Cal. Code of Regs. § 15093(b) ("The Statement of Overriding Considerations shall be supported by substantial evidence in the record.")).

Here, the SOC is premised entirely on unsubstantiated **theories and ideas**, not on any identifiable benefits supported by substantial evidence in the record.

For example, **nothing in the AEO limits its application to farmers or ranchers**. Rather, **any** owner of AG-II land can use the AEO to develop hospitality uses on AG-II parcels in unincorporated Santa Barbara County.

The text of the "overriding considerations" listed at 1.7 in the County's Statement of Overriding Considerations is set forth below in **bold font** and is followed by our comments highlighting deficiencies.

A. The Project . . . gives farmers and ranchers opportunities to supplement their agricultural income which, in turn, supports the continuation of agriculture as the additional income can be returned to the agricultural operation and buffer the economic pressures that may contribute to a decline in agriculture. This finding is deficient for many reasons apparent in its own language. The statement that additional income "can," (i.e. could or might be) returned to the agricultural operation is speculative rather than evidentiary. This speculation is not supported by substantial (or, in fact, any) evidence of how or to what extent AEO tourism operations will support farmland protection and viability, and there is no requirement that any resulting supplemental income be reinvested into agriculture. Nor is there any requirement that significant agricultural uses be maintained on the AEO AG-II property because the AEO does not set forth definitions of "primary" or "secondary" as they relate to the agricultural land on which AEO uses will be allowed.

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Again, it cannot be overstated that **nothing in the AEO limits its application to farmers or ranchers**. Any owner of AG-II land can use the AEO to develop AEO hospitality uses on AG-II parcels in unincorporated Santa Barbara County. The SOC further relies on the speculative reference to unarticulated “economic pressures” that “may,” (i.e. might or might not) contribute to a decline in agriculture – when no such decline is supported by any evidence in the record. This is speculation layered on speculation without the assistance of any substantial evidence. Moreover, to the extent agricultural uses are in decline, the most common cause is land value pressure favoring uses other than farming, e.g., hospitality. Further, in the west, water is a necessary component of agriculture, and the AOE increases pressure on the aquifer by introducing thousands of additional visitors to the region.

The Project also offers opportunities for farmers and ranchers to bring visitors to agricultural lands and educate them regarding the need for, and benefits of, agricultural lands and where their food comes from. This is speculation of what might occur rather than a statement of what will occur backed by substantial evidence. As stated above, the AEO sets forth no requirement that agricultural uses be maintained on the property because there is no statutory definition of “primary” or “secondary” as they relate to agriculture.

- B. The Project (as modified by incorporation of EIR mitigation measures) promotes the orderly development of supplemental agricultural uses and rural recreational and agritourism uses by incorporating development standards that require appropriate siting, setbacks, buffers, hours of operation, and other standards, thereby protecting public health and safety in addition to the natural environment.** This finding is tautological and states nothing more than that the AEO attempts to mitigate its harmful effects on the environment as required by law. This is a statement of mitigation measures, not a finding of a public benefit capable of counterbalancing the admitted environmental harm.
- C. The Project (as modified by incorporation of EIR mitigation measures) promotes continued agricultural production as an integral part of the region’s economy by providing farmers and ranchers with opportunities to supplement existing agricultural operations and income. In turn, the additional income from these supplemental uses would provide relief to those farmers and ranchers impacted by competition from foreign markets, rising costs of water supply, and other farm production expenses that could contribute to a decline in agricultural production.** The first sentence of this “finding” is the same as finding “A” above, and it contains the same analytical flaw (depends on a use of funds that may or may not occur and is not required). The threats hypothesized in the second sentence are not supported by substantial evidence in the record. In fact, California is a net exporter of agricultural products. Much farming is done from well water (rather than purchased), and the

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references to “farm production expenses” and to “a decline in agricultural production” are speculative.

- D. The uses enabled and streamlined by the Project (as modified by incorporation of EIR mitigation measures) provide additional revenue sources for participating farms and ranches, helping sustain long-term agricultural production and incrementally decreasing pressure for conversion of agricultural lands to non-agricultural uses.** The substance of this “finding” is the same as “A” and “C” above. To the extent it is different, the idea that the AEO is “incrementally decreasing pressure for conversion of agricultural lands to non-agricultural uses” is not supported by substantial evidence. **To the contrary, the AEO itself provides for the conversion of some agricultural land to non-agricultural uses.** The expected secondary effect of such conversion will be to increase land values to reflect hospitality uses – preventing new agricultural uses and encouraging conversion of existing agricultural uses. See [As Investors Pay Top-dollar for Land, Farmers Are Often Priced Out](#), Investigate Midwest (Aug. 19, 2024).
- E. To the extent that the Project’s supplemental rural recreational and agritourism uses benefit ongoing agricultural operations by providing supplemental income to farms and ranches, the significant and unavoidable impacts to air quality (criteria air pollutants NOX and ROC), GHG emissions, and transportation (VMT) that would result from these uses are acceptable as these uses would further the goals and policies to preserve agriculture.** This is a conclusory statement unsupported by substantial evidence. Further, it is speculative. The SOC concedes its own inadequacy when stating, that “**to the extent**” that it benefits agriculture (which from the record, it may or may not do), such benefits might make the conceded significant impacts acceptable. The SOC’s statement is a truism supporting nothing. The SOC is required to provide substantial evidence of the AEO’s counter-balancing benefits – not to speculate tautologically that if the AEO had such benefits, such benefits would provide such a balance.
- F. The Project (as modified by incorporation of EIR mitigation measures) provides an efficient and clear permit process for the uses enabled and streamlined by the Project, which will increase compliance with the regulations and standards included as mitigation measures.** Again, this statement is tautological rather than helpful. The assertion that the AEO contains measures to mitigate its harm, does not provide substantial evidence of its counterbalancing public benefit.
- G. The Project (as modified by incorporation of EIR mitigation measures) establishes land use requirements and development standards for agricultural enterprise uses to minimize potential adverse effects to the natural environmental, natural resources, and wildlife, including riparian corridors, wetlands, sensitive habitats, and water resources.** This finding is the same as that in “F” above. While it is

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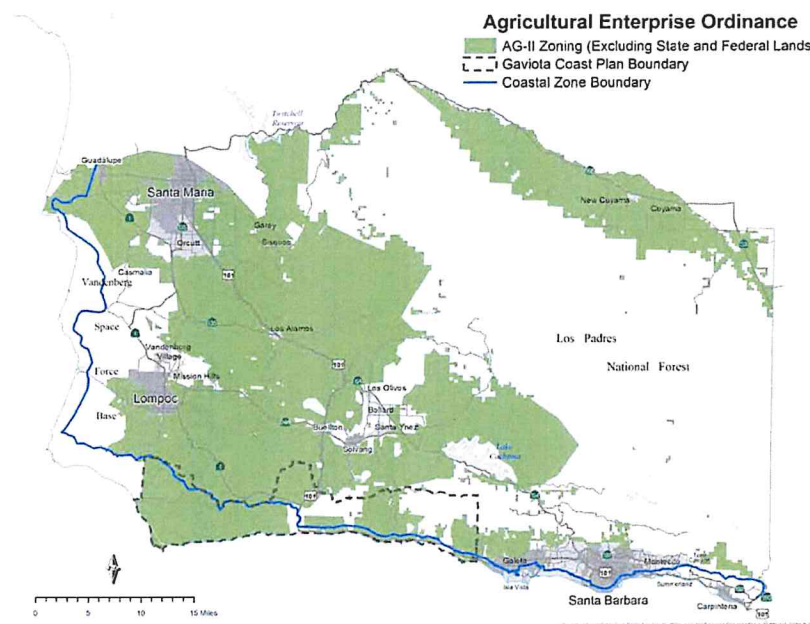
commendable that mitigation measures are included to reduce the AOE’s admitted significant environmental impacts, that does not in itself provide substantial evidence of a public benefit capable of counterbalancing the AEO’s unmitigated substantial environmental effects.

H. No feasible mitigation measures were identified to reduce the project impacts related to criteria air pollutants, GHG emissions, and transportation. Two project alternatives were identified to reduce these impacts; however, neither alternative would result in reduction of these impacts to insignificance or achieve all of the identified objectives of the Project. This assertion misstates the applicable standard. There is no requirement that alternatives reduce impacts to “insignificant.” The findings above do not provide substantial evidence of any economic, legal, social, technological or other benefits, including regionwide or statewide environmental benefits, to be used in balancing the unavoidable environmental risks. Cal. Code of Regs. § 15093(a).

In conclusion, the SOCs are deficient because they fail to provide substantial evidence of any economic, legal, social, technological benefits (including regionwide or statewide environmental benefits) to be used in balancing the unavoidable environmental risks. Cal. Code of Regs. § 15093(a). Consequently, the Board’s adoption of the proposed SOCs will not be compliant with California law, so the EIR should be returned to staff and consultants for revisions as explained here and as otherwise needed.

PROJECT ALTERNATIVES ARE INADEQUATE

As shown on the map below, the AEO applies to, and constitutes a re-zoning of, the vast majority of the unincorporated portion of Santa Barbara County (that is not state or federal land).



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The project alternatives analyzed in the EIR are inadequate. The EIR sets forth the “no project” alternative together with two other project alternatives, neither of which reduces the acreage covered by the AEO.

It defies reason, in such a vast area, not to include an alternative that would reduce the geographic area affected by the ordinance. It strains credulity to believe that, in an AEO Project area encompassing hundreds of thousands of acres, that an alternative with a few less acres in sensitive areas might not reduce the Project’s significant environmental impacts while satisfying project objectives. For example, an obvious project alternative would be to limit the area of the AEO only to rural parcels zoned AG-II-100 or larger. This would not only reduce the environmental impacts of the AEO hospitality uses, it would also remove pressure from the County’s urban-ag boundaries.

EVALUATION OF ENVIRONMENTAL IMPACTS

The EIR, as written, cannot properly be certified by the Board because the analysis of environmental impacts is statutorily deficient and, in many cases, fails to analyze the potential cumulative effects allowed by the AEO. Although there are many potential categories for dispute, for brevity, this letter focuses on aesthetics, land use and planning, public services, and wildfire.

The AEO area covers hundreds of thousands of acres and, in the name of “streamlining,” permits many hundreds, and possibly thousands, of potential development projects containing many thousands of potential hospitality units. Such projects and hospitality units will be permitted by a ministerial process without additional environmental review of their cumulative effects. Consequently, if their cumulative significant environmental impacts are not studied now, they will evade future review. This is often referred to as “piecemealing” and is unpermitted under CEQA. Therefore, it is imperative that the EIR for the AEO grapples with the AEO’s potential cumulative, significant environmental impacts – which, as currently written, it does not

Aesthetic & Visual Resources

The AEO allows for the ministerial permitting (without additional environmental review) of 500 square foot hospitality cottages and campsites (collectively “**Hospitality Units**”) together with related infrastructure buildings, 2,500 square foot event structures and related lighting. Moreover, depending on circumstances, individual projects not subject to environmental review could serve up to 500 hundred guests at a single event. Given the hundreds of thousands of acres included in the geographic area of the AEO, cumulatively, thousands of Hospitality Units together with hundreds of event facilities may be constructed – without further environmental review.

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Despite the breathtaking scope of the AEO, the EIR systematically fails to grapple with the obvious cumulative aesthetic effects of such projects. No mitigation measures are imposed for any of the foregoing because the EIR concludes that each project will, in and of itself, be insignificant.

First, without the inclusion of any mitigation measures (of which there are **none**) the unsupported statement that even one project could not have an effect on aesthetics is obviously erroneous. For a simple example, even a dozen Hospitality Units placed along a scenic ridgeline has an obvious aesthetic effect – and such projects could (depending on circumstances) have up to 60 Hospitality Units, together with a 2,500 square foot event center.

More importantly, though, is that the EIR contains absolutely no analysis of the cumulative effects of such projects. The EIR states confidently (if incorrectly) that, because each Hospitality Unit (or each AEO use) would have an insignificant effect, there cannot be a cumulative effect. Again, this is facially erroneous. While the EIR (deficiently) does not articulate the potential number or impact envelope of Hospitality Units and event facilities, such facilities would be available to **all AG-II lots of at least 40 acres in an area encompassing hundreds of thousands of acres.**¹ Consequently, it is reasonable to presume the existence potentiality of thousands of Hospitality Units, hundreds of event centers serving many thousands of guests, all of which would be exempt from further (meaning **any**) discretionary environmental review.

Night Sky & Lighting: The EIR acknowledges the aesthetically desirability of the existing dark sky in rural Santa Barbar County. It also admits the impact of development on dark sky conditions, including the cumulative glow of artificial lights. However, nowhere does the EIR analyze the cumulative effects of lighting for thousands of new Hospitality Units and hundreds of event spaces with their requisite supporting facilities. This follows from the same fallacy: assuming (incorrectly) that no individual Hospitality Unit (or, perhaps, though not articulated: individual project) will have a significant effect and that, therefore, the sum of all such effects must be insignificant – which, of course, defies both mathematical law and reason.

For the reasons set forth above, the analysis of aesthetic and visual resources is deficient.

¹ The failure to establish the outside limit of the development envelope the AEO allows without further environmental review constitutes a fatal flaw in the analysis because, without that number, it is impossible to fully analyze the cumulative effects of any one or more (or all) of the new AEO uses. We have attempted to make some suppositions, but our efforts (as well as the efforts in the EIR) are frustrated by the lack of any hard data regarding the total extent of the development envelope.

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Land Use & Planning

The EIR purports to analyze the potential effects of the AEO on the County's existing land use regulatory framework and concludes that it is insignificant. That conclusion is erroneous for several reasons, including that it fails to recognize that nothing on the face of the AEO ensures that it will only "involve[] development on rural agricultural lands, away from urban centers." Final EIR at 3.10-41.

By its own terms, the **AEO applies to "agricultural lands zoned AG-II"** in proposed AEO Sections 35.42.035(A) and 35.42.035(B)(1). This statutory language both creates unnecessary ambiguity and impermissibly conflicts with the County's Land Use and Development Code and the Comprehensive Plan. See Cal. Gov't Code § 65860.

The County Land Use and Development Code reserves AG-II zoning to areas appropriate for agricultural uses "**within the Rural Area as shown on the Comprehensive Plan maps.**" Land Use & Dev. C. § 35.21.010(B)(emphasis added); see also *Id.* at § 35.21.020, *Id.* at 35-69.1 ("The purpose of the Agriculture II district is to establish agricultural land use for large prime and non-prime agricultural lands **in the rural areas** of the County (minimum 40 to 320 acre lots) and to preserve prime and non-prime soils for long-term agricultural use.") (emphasis added); [SB County Agricultural Element](#) (explaining on page 11 that the AG-II "designation applies to acreages of farm lands and agricultural uses located **outside Urban, Inner Rural and Rural Neighborhood areas.**") (emphasis added).

This error could be easily correct by adding the following **bolded text** to the following sections of the AEO:

"The intent is to provide for flexibility in the development of uses . . . while promoting orderly development of these uses on agricultural lands zoned AG-II **within the Rural Area as shown on the Comprehensive Plan maps.**" -- Proposed Section 35.42.035(A)

"AG-II Zone. The requirements of this Section 35.42.035 (Agricultural Enterprises) apply to agricultural enterprise land uses that are proposed to be located on lands zoned AG-II **within the Rural Area as shown on the Comprehensive Plan maps.**" - -- Proposed Section 35.42.035(B)(1).

While this error is easily fixed, the current language of the AEO impermissibly does not conform to the County Land Use and Development Code. Consequently, this nonconformance should be remedied.

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Public Services, Utilities, and Recreation

Similar to the EIR's deficient analysis of aesthetics, there is an absolute failure to analyze the cumulative effects of all public services, including fire and police. The EIR states that because "there would be no new permanent residential populations that would affect personnel-to-population ratio, response times, or otherwise result in additional demand for fire protection or police services," there can be no significant effects to publicly safety services. This assumption is erroneous.

Fire Protection Services: The analysis assumes that the only driver of needed fire services, which include fire and paramedic, is permanent residents. It then assumes away any significant cumulative impacts by saying each individual project will have an insignificant impact. Such analysis **fails to contemplate the cumulative impact of thousands of Hospitality Units and hundreds of event facilities serving a temporary population of thousands, which in many rural areas will well outnumber the number of permanent residents on any given day.** The idea that only permanent residents require fire and paramedic services is facially specious. We know this by the number of additional sirens we hear on summer weekends, and we can be sure that the County could know it from its own records. It is inarguable that thousands of added hospitality guests – many enjoying a glass or two of wine, a horseback ride or a bicycle ride, or some combination thereof, will require additional services. Further, as discussed below in the Wildfire section, the presence of more development and guest activities in rural areas will necessarily increase fires risks and events. Finally, the location of hospitality guests in rural areas – away from the more urbanized towns and townships, will increase drive times so that not only will there necessarily be more calls with more people, the fire staff time spent on those calls will statistically be increased.

Police Protection Services: As with fire protection, the EIR assumes away any potential effects by assuming that only permanent residents use police services. Though, the EIR's analysis of police services at least vaguely contemplates that educational opportunities and farm stays might possibly introduce additional temporary population to rural areas. However, the EIR then summarily dismisses any concern stating that such uses "are not anticipated to result in a measurable increase in calls for services related to crime, injury, or disputes due to the strict limitations in their size. As a result, impacts to police protection would be insignificant."

First, it is glaring that the **EIR's analysis was limited to considering educational opportunities and farm stays rather than say weddings, wine tastings, and athletic events with up to 500 participants**, when assuming away any need for additional policing. Obviously, it is indisputable that such events increase the need for police services. **For example, our local police were just called upon to resolve a potentially deadly standoff at a local winery's wedding venue.** Further, the idea that wine tasters and

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partiers do not require police services or that a bicycle event for 500 participants would not require policing is not reasonable.

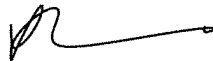
The EIR's election to only consider the most benign subset of potential activities, and then summarily dismiss the need for any additional police services because there would not be any increase in police calls related to crime, injury, or disputes is fundamentally misguided. As in the other cases addressed above, there is a complete failure to contemplate the cumulative effects of each of these activities and venues that are defined as "insignificant" individually but would have obvious cumulative significance.

Wildfire

As in the above discussion, the wildfire analysis assumes away the cumulative effects of constructing and operating thousands of Hospitality Units and hundreds of event facilities serving thousands of users in high-fire risk rural areas lacking safety infrastructure for high-density occupancy. It is inarguable that construction and operation of guest activities in high-fire hazard rural areas served by narrow and winding roads (some unpaved) necessarily and inevitably increases wildfire fire risks. It does so by increasing the number of human-caused fires and by increasing the potential losses from such fires. **The conclusion that allowing potentially thousands of Hospitality Units and hundreds of event facilities in remote, high-fire areas will not result cumulatively in an increased number of fires and fire risk is not reasonable.**

In closing, for the reasons set forth above, the EIR needs to be further revised and recirculated, and the AEO needs to be revised prior to certification and adoption by the Board.

Sincerely,



Paul Rohrer

Katherine Douglas

From: ranie egusquiza <raniejade@gmail.com>
Sent: Sunday, November 3, 2024 8:06 PM
To: sbcob
Subject: Agricultural Enterprise Ordinance

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Board of Supervisors,

You will undoubtedly hear from individuals who have been part of the agriculture business for generations, and whose livelihoods depend on the opportunity to sustain a way of life rooted in tradition, education, and wellness. I hope those voices are truly heard and understood. With that said, I would like to offer an additional perspective that exemplifies the importance of passing this ordinance.

I did not grow up near ranches or farms, nor did my family have much knowledge about food or where it comes from. Unbeknownst to me and my family, this lack of knowledge resulted in health issues that went unresolved from childhood to adulthood. Years of countless tests and medication did not seem to make any lasting difference. It wasn't until I met my now-husband, who comes from a family passionate about both consuming and providing ethical and sustainable food, that I was able to make changes to my diet that ultimately improved my health and life for the better. I believe my personal experience highlights the importance and value of those who raise and grow the food that sustains us.

Seeing my health improve and recognizing a healthier, more community-oriented, and grounded way of life available, my husband and I made the decision to move from San Diego to Santa Ynez Valley about two years ago, with hopes of providing our future children with the best chance to thrive. We continue to stand by that decision; however, there are very clear threats to the dream we have for our children and all future generations.

As restrictions and prices increase, it is becoming unsustainable for most small businesses, including ranches and farms, to continue providing critical services and products to their communities and beyond. It feels like every day we see small businesses shut down and hear about unethical companies buying up land and family-owned businesses just to strip them of their heart and health due to greed. If passed, the ordinance will create opportunities for those genuinely in the agriculture business to keep their doors open, keep our communities healthy, and continue to fight for a better way of life.

No matter who you are or where you are from, I believe you deserve knowledge about and access to healthy, sustainable food. I truly believe passing the Agricultural Enterprise Ordinance is an important step toward that goal for Santa Barbara County.

I appreciate you taking the time to read my comments and for looking after our beloved community.

With Great Appreciation,

Ranie Patrick

Katherine Douglas

From: Kathryn Lohmeyer Rohrer <lohrohrer@gmail.com>
Sent: Monday, November 4, 2024 10:07 AM
To: sbcob
Subject: WRITTEN PUBLIC COMMENT: BOS 11/5/24 Agenda Item 7. Ag Enterprise Ordinance

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Honorable Supervisors:

I have been following the development of the Ag Enterprise Ordinance (AEO) since it was in its much more modest form: a farmstay ordinance. See [Jan. 21, 2021 Workshop materials](#) (describing the ordinance as "proposing to revise the zoning ordinance to allow farmstays in Agricultural II zones throughout the unincorporated area beside the Gaviota Coast Planning Area").

I write today based purely on my own observations and my own interest in the preservation and promotion of agriculture, and of our rural and semi-rural communities, in beautiful Santa Barbara County.

Clearly, this legislation has ballooned in size and scope since 2021. Also since 2021, we've already seen an expansion of unpermitted and unregulated campgrounds, farmstays (masquerading as "short-term rentals") and event venues on both AG and non-AG land throughout the County. Speaking just about the community in which my family lives, I can attest that the local roads and highways, township parking, and public services and utilities in the Santa Ynez Valley's Inner-Rural area are already overtaxed.

It would, at this point, be wholly naïve to proceed as if we do not have outside investors and developers champing at the bit to exploit every loophole (many of which are glaring) in the AEO.

If the Board wishes to support rural farming and ranching in Santa Barbara County, I ask that you enact legislation directed at the relevant population. They are both: (a) rural and (b) actual farmers and ranchers. This is easily done by ensuring that:

1. the AEO applies only on: lands zoned AG-II-100 or larger within the Rural Area as shown on the Comprehensive Plan maps; and
2. the AEO's key terms are unambiguously defined to require that the pursuit of active, actual farming or ranching must remain the primary use of the rural AG-II-100+ parcels wishing to take advantage of the AEO's provisions. The statutory definitions of "primary" and "secondary" will need to be clearly tied to (and measurable in relationship to) geographic footprint, income, or capital investment. To truly achieve its stated goal, the AEO would also require that some or all of the "secondary" revenue stream be reinvested into (i.e. actually support) the primary agricultural use(s) of the land.

Once the above proves successful, it would make sense to consider whether smaller or additional AG-II parcels throughout unincorporated Santa Barbara County should be added to the program.

Thank you,
Kathryn Lohmeyer Rohrer
Los Olivos farmer, resident, and parent

--

Kathryn Lohmeyer Rohrer

Katherine Douglas

From: Alison Laslett <Alison@sbcountywines.com>
Sent: Monday, November 4, 2024 10:11 AM
To: sbcob
Subject: Agricultural Enterprise Ordinance Submission for BOS, Nov 5th
Attachments: Letter - AEO Vineyard Exemption Request - SB Vintners.pdf

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Clerk,

Please find attached three PDF files for the Agricultural Enterprise Ordinance portion of the agenda at the Board of Supervisors meeting tomorrow, November 5th. Attached is one letter, and two illustrative maps that accompany the letter.

I will sign up to speak publicly tomorrow and would like to have the two maps (Exhibits 1& 2) available for reference on the screen during my testimony.

Thank you and sincerely,

Alison Laslett

Alison Laslett
CEO | Santa Barbara Vintners

M: 310.463.0262
alison@sbcountywines.com

140 W Highway 246
PO Box 1059
Buellton, CA 93427

www.sbcountywines.com



Alison Laslett, CEO
Santa Barbara Vintners
140 W Hwy 246, Box 1059
Buellton, CA 93427

November 4, 2024

Santa Barbara County Board of Supervisors
105 E Anapamu St., #407
Santa Barbara, CA 93101

Dear Santa Barbara County Board of Supervisors,

I am pleased to see the Agricultural Enterprise Ordinance (AEO) has reached this stage of approval. I was on the initial ad hoc AEO formation committee, and have also participated on the AEO sub-committee of the Agricultural Advisory Committee (AAC) to develop the details of the ordinance. We are very pleased with the outcome of everyone's efforts.

We have only one area of concern to address.

During the creation of the Potential Limited AEO Overlay in Santa Maria, we submitted maps of all vineyards in Santa Barbara County with the expectation that vineyards would be exempt from the overlay. As the overlay has been developed, the vineyards have been included. We do not know if this was intentional or an oversight, but either way, we would like to address the issue.

Currently, any vineyard included in the overlay is subject to the additional limitations it imposes. In an effort to allow the overlay to be as broad as possible, we reached out to the vineyards included in the overlay to ensure they understood these limitations. With that understanding, three vineyards on the border of the overlay and one slightly inset request exemption from the overlay, which would allow them to engage in the AEO activities as outlined for the rest of the County outside the overlay. They are:

- Maria Vista (Coastal Vineyard Care also requested exemption)
- Garey Ranch (Coast Vineyard Care also requested exemption)
- Solomon Hills (north)
- Cottonwood Canyon

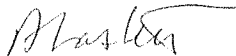
I have included two maps to illustrate the location of these vineyards.

- 1) A map of the Potential Limited Agricultural Enterprise Overlay Map from the County website, on which I have highlighted an inset where the vineyards are located.
- 2) A detail of that inset, showing the Overlay Boundary and the four vineyards requesting exemption.

To be clear, an exemption from the overlay will allow these vineyards to engage in AEO activities according to the requirements and limitations stipulated outside the overlay.

Thank you for your consideration of this request.

Best,



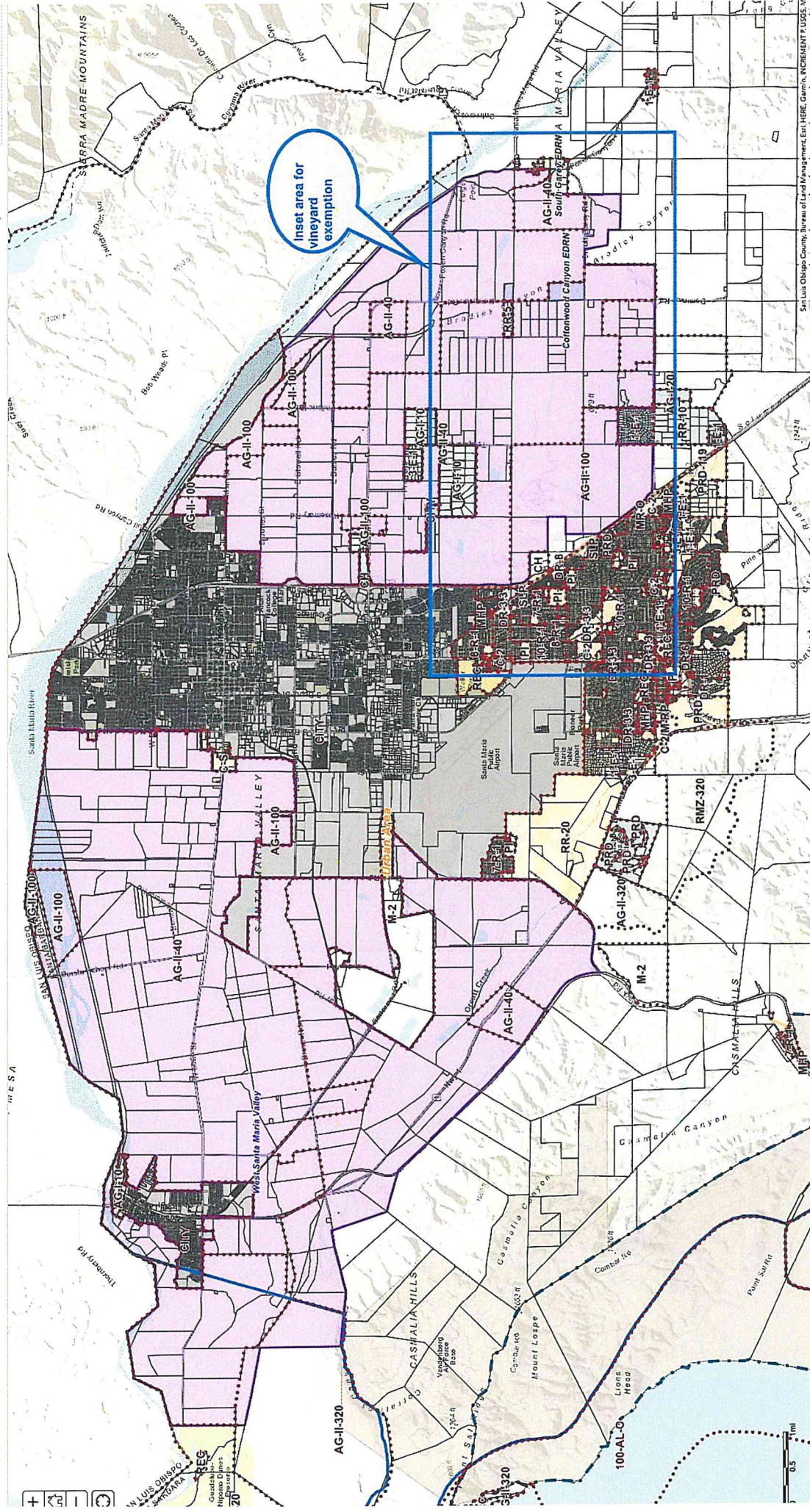
Alison Laslett, CEO
Santa Barbara Vintners

GIS > Ag Enterprise Ordinance - Potential Limited Agricultural Enterprise Overlay Map

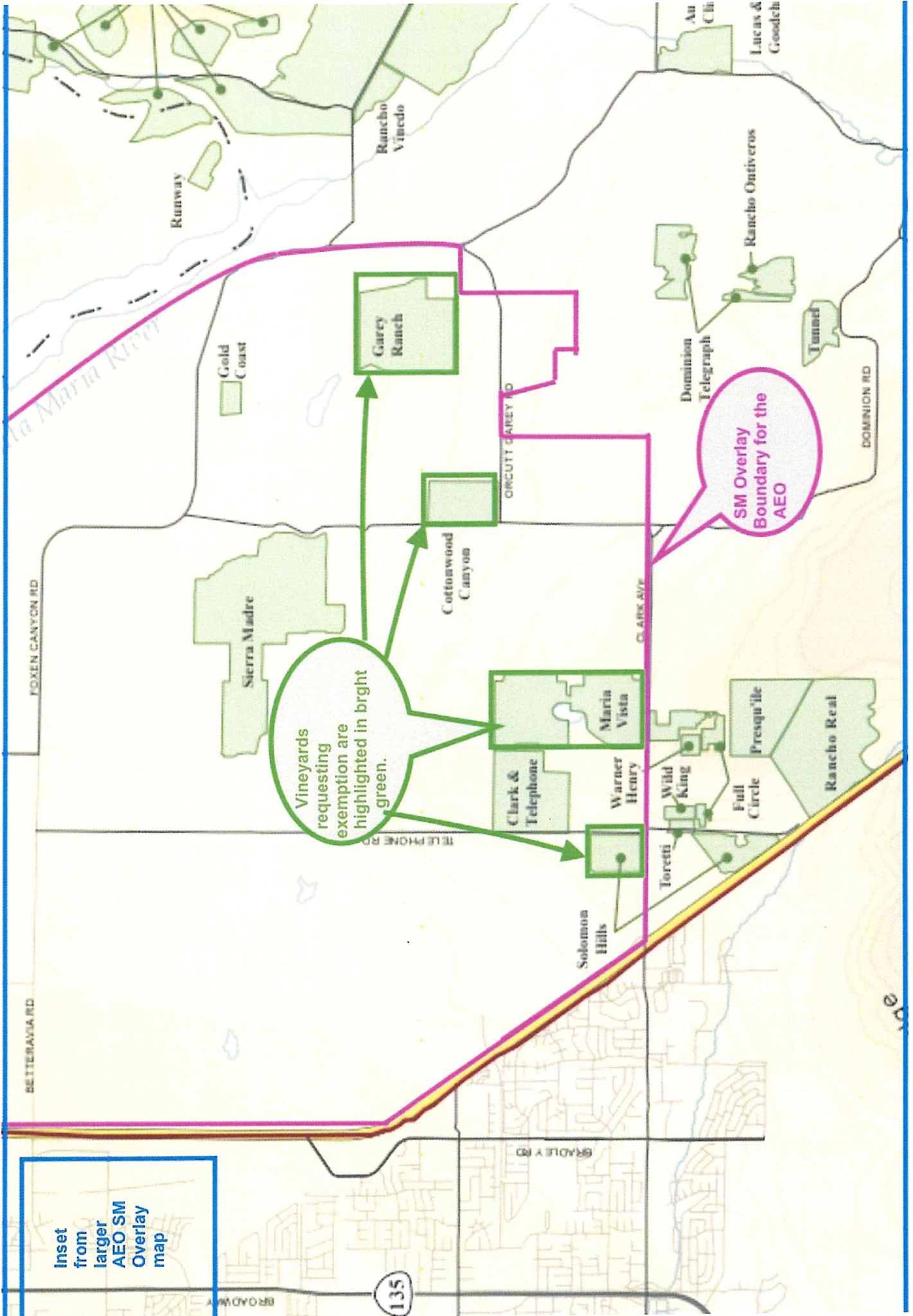
Open In Map View

Details | Basemap

Share | Print | Measure | Find address or place



Inset area for vineyard exemption



Katherine Douglas

From: Alexandria Wilson <alexwilsoncoach@gmail.com>
Sent: Monday, November 4, 2024 11:18 AM
To: sbcob
Subject: AEO

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Santa Barbara County Board of Supervisors
Via email to: sbcob@co.santa-barbara.ca.us

RE: Nov. 5, 2024 Departmental Agenda Item 7. Agricultural Enterprise Ordinance

Dear Honorable Supervisors:

We are Santa Barbara County residents: farmers, ranchers, and other community members. We are reaching out to you because we remain deeply concerned about the unintended consequences the Agricultural Enterprise Ordinance (AEO), as it currently stands, can reasonably be expected to have on the character of our communities and open spaces, traffic safety on our rural roads and highways, the health of our environment, and the long-term sustainability of agriculture in this County.

As written, the AEO paves the way for the rapid conversion of large swaths of agricultural land to developed, hospitality operations. This is not exaggeration. This is what happens when developers – as well as farmers, ranchers and others who own AG-II land and have development dreams for that ag land – have the ear of lawmakers and create a false sense of urgency to push through complex legislation that includes ambiguous terms and lacks adequate enforcement mechanisms.

With all due respect to the County Planning staff and Commissioners and to their hard work on the AEO, the idea that the public is adequately informed about the AEO (what it is, what it means, where it applies, etc.) is not supported by [their own characterization of the “outreach” efforts](#), which include: emails to 500 people, four public workshops, meetings on the EIR, public meetings of other committees made up of political appointees, and Planning Commission hearings that were noticed only to those who knew to ask to be added to a mailing list.

Instead, it is helpful to consider: **How many owners or residents of non-AG-II parcels either received emails or were invited to workshops to learn about the AEO and the many activities that the AEO will allow, without any permit at all, concurrently on every single AG-II parcel in unincorporated Santa Barbara County?** That group (those who do not own AG-II parcels) likely constitutes the vast majority of the residents in unincorporated Santa Barbara County. If most of them have not had **any** notice of this huge piece of legislation with serious implications for the future of our communities and land, it seems like it is time to pause and consider that this legislation may not reflect the democratic process at work.

Many of us (the undersigned) learned about the AEO in recent months through word of mouth and newspaper articles. What we have learned so far gives rise to considerable concerns, some of which we summarize below and would welcome the opportunity to explore in greater detail with you in future meetings.

The Effects of Stackable AEO Uses

As has previously been raised in public comments to the Planning Commission, the current version of the AEO expends a great deal of energy on *Enterprise* and relatively little on *Ag*. Notably, the AEO allows an **unlimited stacking** of each and every hospitality-industry use (“**rural recreational/agritourism uses**”) included in the AEO. This is problematic both as a practical matter and in connection with the programmatic EIR.

As a practical matter, allowing a developer to create a farm stay, a campground, RV spaces, a winery with incidental food services, guided tours, and even an event venue all on a single ag parcel will result in densely-developed resorts retaining only some trappings of “farmhouse chic” as decor. Under the current rubric, on any given day, **all of the following activities could be run concurrently on, and bring traffic to and from, a single 100-acre agricultural parcel:**

1. Farming/ranching operations
2. Farm stays for **15 guests**
3. 20 campsites [estimate **80+ guests**]
4. Winery offering incidental food services [**unlimited guests**]
5. Small guided tours for **15 guests** (max 80 per year)
6. Other educational activities for **75 guests** (25 days per year)
7. Small-scale events for **50 guests + catering/event staff** (12 days per year)

On top of the **traffic**, neighbors will also be subjected to the related **dust**, and **litter**, and **unregulated parking**. As for **noise**, it is a given, and the idea that a set-back or “buffer” of a couple hundred feet is going to be adequate to keep amplified sound from bothering neighbors out in our rural and semi-rural spaces strains credulity.

Even if we suspend disbelief and posit that rural and inner-rural neighbors will not be terribly troubled by the effects from these **non-agricultural AEO uses** on a single AG-II parcel, it seems fairly certain that neighbors will notice when a **string of 3, 4, or 5 AG-II parcel owners along the same stretch of rural roadway all decide to maximize the AEO rural recreational uses on their AG-II parcels.**

Even the summary for the AEO’s **programmatic EIR** recognizes, at ES-7, that the collective impacts are expected and real:

*In summary, the proposed Project would result in **significant and unavoidable Project-level and cumulative impacts related to air quality, greenhouse gas (GHG) emissions, and transportation even after mitigation is applied to reduce the level of impact.** Based on the analysis provided in this EIR, the proposed Project would result in **significant and unavoidable impacts related to criteria air pollutant emissions, GHG emissions, and increases in countywide VMT [vehicles miles travelled], as summarized below.** These projects would not generate significant and unavoidable impacts individually, but **depending on the extent to which property owners make use of the ordinance and the popularity of the uses, these projects could have collective impacts related to an increase in vehicle trips and mobile-source emissions.***

Planning Commissioners have commented on the importance of the AEO’s benefits for farmers, ranchers, and developers – even identifying hospitality projects by name in public hearings. **What we have not heard – and what we do not see in either the programmatic EIR or in the language of the AEO itself – are concerns for all the other residents of unincorporated Santa Barbara County who are expected to bear the immediate and long-term environmental and societal hazards the AEO will introduce into our rural and semi-rural communities.**

Additionally, as was previously raised to the Planning Commission, while the EIR recognizes that the AEO will cause **significant** and **unavoidable** environmental effects on Air Quality, Greenhouse Gas Emissions, and Transportation, it does not properly address the reasonably expected significant environmental effects in other areas such as: **Aesthetics and Visual Resources, Agricultural Resources, Biological Resources, Hydrology and Water Quality, Land Use and Planning, Noise, Public Services, etc.** Moreover, the proposed alternatives to the AEO do not equip decision makers with a workable list of project alternatives to be considered and are, as a result, deficient.

We respectfully request that the Board return the draft AEO and EIR to staff with instructions to return with a **limited farm stay and permit streamlining ordinance** that will **benefit, protect, and promote** our Santa Barbara County **agriculturalists and agricultural land** rather than the outside developers seeking to exploit it. Once a narrower, ag-based program is successful, a thoughtful approach to expansion would be reasonable. We are, of course, happy to support those efforts.

Lack of Enforcement

In light of the reasonably anticipated incompatibility (**traffic, parking, dust, litter, noise**) of stackable **non-agricultural** AEO hospitality operations next door to residences, we respectfully request that some reasonable enforcement mechanism be included in the AEO.

“Call the Sheriff” is not going to do the trick if outdoor lighting is on and music is thumping away after the kids’ bedtime, cars are peeling out of the parking area, trash is being thrown on the neighbor’s lawn, etc. Additionally, individual homeowners will be at a further disadvantage if things escalate and the “neighbor” violating the AEO standards for lighting, amplified music, or number of campsites is a large corporation that has a big budget and the benefit of an in-house legal department.

Inadequate Preservation and Promotion of Agriculture

As much as we need to know the AEO includes protections for the neighbors of AEO operations, we also want to assure you that we share the goal of preserving the proud traditions of farming and ranching in Santa Barbara County. We fully support the goals of keeping farmers farming ag land, as long as it is done in a way that will support (and not undermine) the local agricultural economy. At the same time, it is an open secret that realtors throughout Santa Barbara County have been showing AG II parcels to potential buyers – to developers and hospitality industry enterprises – for several months in express anticipation of enactment of the AEO. The drive to get the AEO enacted – and the show of support by developers for the AEO -- really is a cause for concern.

The AEO itself needs to reflect a commitment both to **(a)** preserving the primacy of agricultural uses of agricultural lands and **(b)** maintaining neighborhood compatibility between rural land and the urban and inner-rural parts of the County. This should begin with the definitions of the essential terms used throughout the ordinance. For example, the AEO is supposed to apply to “rural unincorporated lands zoned Agricultural II (AG-II),” yet, the ordinance does not even offer **definitions** that will:

1. limit its application to parcels that are both **rural** and **agricultural**, or
2. set a standard to which owners/operators can be held to ensure that the **primary use** of the land remains agricultural even after AEO activities are introduced.

Whether inadvertent or intentional, this ambiguity is problematic and does not appear to benefit or preserve agriculture in unincorporated Santa Barbara County.

Lack of Overlays for Vineyards

Finally, we note that, this summer, Planning Commissioner Parke introduced the idea of “Limited Ag Enterprise Overlays” (“LAE Overlays”) for areas he had identified as home to considerable row crop operations in North County. It is our understanding that parcels within the LAE Overlays are not precluded from offering AEO rural recreational activities on their parcels. They must, however, go through the usual permitting process (which includes a determination of neighborhood compatibility) in order to undertake such activities.

Vineyards are, of course, row crops; and many of vineyards throughout Santa Barbara County are on AG-II parcels or immediately adjacent to AG-II parcels that will want to participate in the AEO. Organic, sustainable, and biodynamic vineyards adhere to strict standards to maintain their certification. Also, like all row crops, vineyards are treated with pesticides; and “all pesticides used in farming — whether organic, Biodynamic or synthetic — have a level of risk. It does not, however, appear that the Commission considered LAE Overlays for vineyards or heard and considered any scientific or professional input on the subject of overlays for vineyards. We respectfully request that one or more LAE Overlays also be considered for the wine-growing regions in and around the Santa Ynez Valley, Los Alamos, the Santa Rita Hills, and Lompoc.

In conclusion, we are deeply concerned that the AEO (like the programmatic EIR for the AEO) does not adequately reflect an awareness of, or concern for, constituents other than the current and prospective owners of AG-II parcels eager to profit from the AEO; and we respectfully request, to paraphrase Supervisor Hartmann, that the Board of Supervisors not treat this as a matter of “business as usual” because failing to take time now to address the considerable unintended consequences of pushing this legislation through as written would be “missing the whole point.”

Sincerely,

Gary Thorne

Alexandria Wilson

Patricia Ann Gott

Anna Marie Gott

Robert Palma

Kelly Palma

Sam Kendall

Chloe Kendall

Michael Gordon

Kathie Gordon

Mick Kelleher

Renee Kelleher

Paula Parisotto

Fausto Parisotto
Lefty Obledo
Shayne Merritt
Melvia Parisotto
Cristian Montecino
Katy Montecino
Dana Kreiger
Greta Kreiger
Cody Montano
Arnold DeNunzio
Jennifer DeNunzio
Jeff Edell
Hibert Edell
Lynne Edell
Jennifer Rasmussen
Tyler Rasmussen
Toby Rasmussen
Conner Pfefferle
Charlie Ashborn
Jake Sheilds
Kayc Bunderson
Kim Wright
Vandale Wright
Connie Meynet
Bob Oswaks
Jane Oswaks
Lori Christianson

Katherine Douglas

From: Alexandria Wilson <alexwilsoncoach@gmail.com>
Sent: Monday, November 4, 2024 12:59 PM
To: sbcob
Subject: AEO

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Supervisors,

Please add these names to the email sent November 4 2024 at 11:17am from this email, Alexwilsoncoach@gmail.com.
Regarding the November 5 hearing concerning the AEO.

Charlie Ashborn
Jake Sheilds
Kayc Bunderson
Kim Wright
Vandale Wright
Cori Lassahn
Gary L. Cutshall
Jo-Ann M. Cutshall
Brett G. Cutshall
Doneen R. DellaVallee
Dominick DellaVallee
Ron Pallidino
Julie Pallidino

Katherine Douglas

From: Ranch Manager <ranchmanager@laurelspringsretreat.com>
Sent: Monday, November 4, 2024 3:32 PM
To: sbcob
Subject: Laurel Springs Ranch
Attachments: LSR AG Enterprise Ordinance.pdf

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Greetings, esteemed members of the Santa Barbara County Board of Supervisors,

My name is Joseph DeLeon, and I have the honor of serving as the Ranch Land Manager for Laurel Springs Retreat, located in the picturesque hills of Santa Barbara off San Marcos Pass. I've managed ranches for over 15 years, and for the past three years, I have had the privilege of managing Laurel Springs Retreat. In my time here, I've assessed the property's needs and implemented structural changes to meet the vision of the owners, the Czucker family, who have owned Laurel Springs Ranch for over a decade and are deeply committed to biodiversity and sustainability.

Two years ago, as part of this vision, I hired Daniel Hosea—someone I've known and respected for over 20 years—as our Agriculture Manager to establish and pioneer our ecological garden. Daniel has been dedicated to enhancing our organic operation, and with the support of Elissa and Edward Czucker, he pursued Environmental Horticulture studies at Santa Barbara City College, aiming to eventually share our produce with the community. This commitment led to the proposal of a mentorship program, a collaboration between Laurel Springs Ranch and SBCC, which the Czucker family embraced wholeheartedly.

Following the unexpected passing of Mrs. Elissa Czucker last year, her philanthropic dream continues to grow through the Kol Aryeh Foundation and Laurel Springs Ranch. We have donated hundreds of pounds of fresh produce to SBCC's Basic Needs Center, providing for students and community members in need. Recently, SBCC has formally partnered with us to expand this mentorship program, offering more exposure to Environmental Horticulture at Laurel Springs.

In addition to our garden, we maintain livestock that plays a critical role in soil regeneration, carbon storage, erosion control—essential benefits in mountain communities—and promoting biodiversity through their grazing practices. Our vision is to operate in a way that demonstrates both the economic and ecological viability of sustainable agriculture to the next generation of young people eager to learn. By sharing knowledge and practices that link food production, land stewardship, and community well-being, we aspire to give back to Santa Barbara County in a meaningful way.

Adopting the Agricultural Enterprise Ordinance would be a tremendous step forward. We recognize that the board is currently only considering AG-I and AG-II zoned areas, but we ask that you also consider expanding this ordinance to

include Mountainous-Goleta zoning (MT-GOL-100). This expansion would support small farms like ours by enabling us to offset operational expenses through a small farmstand, agritourism, and recreational activities.

It is well-documented that agricultural work, particularly organic farming, can reduce stress and anxiety, foster social connections, and build a sense of environmental responsibility. The National Library of Medicine and the National Center for Biotechnology Information have both highlighted the mental health benefits linked to organic farming. I can attest to the positive impact this work has on those involved—our ranch provides meaningful experiences that connect individuals to the land, teaching responsibility and engagement while instilling the values that are so important for the leaders of tomorrow.

In closing, I respectfully urge you to adopt the Agricultural Enterprise Ordinance and consider its expansion to include Mountainous-Goleta zoning (MT-GOL-100). This initiative can unlock a world of potential for small farms throughout Santa Barbara County, allowing us to give even more back to the communities that we're so proud to serve.

Thank you for your time and consideration.

Sincerely,

Joseph DeLeon

*Ranch Land Manager
Laurel Springs Retreat
2720 Painted Cave Rd.
Santa Barbara, CA 93105
310-974-2810*



Laurel Springs Ranch

Good morning, esteemed members of the Santa Barbara County Board of Supervisors,

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Thank you for your time and consideration.

Sincerely,

*Joseph DeLeon
Ranch Land Manager*