



Katherine Douglas

Public Comment

From: Rabani-Jenkins, Jordan M. <JRabani-Jenkins@BHFS.com>
Sent: Thursday, October 31, 2024 1:45 PM
To: sbcob
Cc: stevefinkel@whitebuffalolandtrust.org; Harris, Julie; Steinfeld, Amy; Carlson, Mack
Subject: Letter to the Board of Supervisors re Agricultural Enterprise Ordinance in advance of Nov. 5, 2024 Hearing
Attachments: 2024.10.31 Comment Letter to BOS re Agricultural Enterprise Ordinance.pdf

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Dear Chairman Lavagnino and Esteemed Supervisors,

Please see the attached letter on behalf of White Buffalo Land Trust in advance of the November 5 hearing regarding item number 7, the consideration of the Agricultural Enterprise Ordinance.

Clerk of the Board, please add this to the record. Please confirm receipt and let us know if you have any questions.

Thank you!

Best regards,
Jordan

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Brownstein - we're all in.

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WHITE BUFFALO LAND TRUST

November 1, 2024

VIA EMAIL (SBCOB@COUNTYOFSB.ORG)

Cc: Julie Harris, Long Range Planning Division (jharris@countyofsb.org)

Santa Barbara County Board of Supervisors
Clerk of the Board
105 East Anapamu Street
Santa Barbara, CA 93101

RE: The White Buffalo Land Trust's Comments on Agricultural Enterprise Ordinance

Dear Chair Lavagnino and Supervisors Capps, Hartmann, Nelson and Williams:

I'm the Executive Director of the White Buffalo Land Trust. White Buffalo Land Trust is a 503(c)(3) nonprofit committed to the evolution of land stewardship and reimagining our food system to address the climate, biodiversity, public health, and food security challenges we face today. One way we accomplish this goal is by educating the public in the benefits of regenerative agriculture, which the Agricultural Enterprise Ordinance ("AEO" or "Ordinance") will meaningfully improve. The Planning Commission has done a tremendous job of crafting the AEO over the past year.

We support the AEO and applaud the County's extensive outreach efforts and its development of the AEO. As the Board considers the AEO, we respectfully request a few clarifications to the Ordinance, as well as remind the Board that this is an excellent first step for the County to support agricultural landowners.

1. Clarify that the AEO permits stacked uses.

Currently, the AEO is silent on whether agricultural landowners are permitted to develop multiple types of agricultural enterprise projects on a single parcel ("stacked uses"). Stacked uses came up multiple times throughout the AEO drafting process and there are some indications that the intent of the Ordinance is to allow stacking. For example, the environmental analysis considers an alternative plan wherein stacked uses were not allowed for overnight accommodations and it determined that disallowing stacked uses was infeasible. The findings determined that this alternative would have a slight reduction in the negative impacts but that the alternative would not adequately achieve the objectives of the Ordinance because it would limit the supplemental uses that landowners could pursue. However, despite these indications allowing stacked uses, the Ordinance itself does not contain language explicitly permitting stacked uses.

In support of our mission to expand opportunities to educate the public on regenerative agriculture, we request the Board add language to the Ordinance explicitly permitting stacked uses. Without stacked uses, the AEO will not maximize the intended benefits. It would prevent agricultural landowners from taking full advantage of the boost in agrotourism and educational opportunities that the AEO could provide. Alternatively, it may cause landowners to develop piecemeal projects—submitting zoning clearances one by one without a full plan—rather than creating one masterplan for a full project. Permitting stacked uses is the best way to align with the goals of the AEO and to support agricultural landowners.

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White Buffalo Land Trust was founded in honor of the life, work, and love of Lyndsey McMorrow. Her passion for the well-being of people, communities, and the planet continues to inspire our work and is an invitation for everyone to participate in the regeneration and healing of the earth, and the heart.



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We ask that the Board include in the Ordinance a provision allowing stacked uses.

2. We support a finding of compatible uses with the Williamson Act.

We support the Board in amending the County's Uniform Rules to establish that AEO uses are compatible with previously established agricultural preserve contracts such as Williamson Act contracts as stated on the County's Agricultural Enterprise Ordinance webpage.¹ Many of the parcels that would benefit from AEO uses are under such contracts including White Buffalo. Without a finding that the uses are compatible, we may not be able to maximize the benefits of the AEO.

3. This is the first step in supporting agricultural landowners in Santa Barbara County.

The goal of the AEO is to support agrotourism in Santa Barbara County. The AEO is a great step in that direction. However, we urge the County to recognize that this is only the first step in supporting agricultural enterprise uses. For example, key uses contemplated in the AEO, such as farmstays and campgrounds, may require additional discretionary permits from the County's Environmental Health Services (EHS). These additional EHS permits may trigger County requirements to obtain a discretionary Minor Conditional Use Permit (MCUP) through a separate application process. For the AEO to streamline permitting and to improve the economic viability of agricultural uses throughout the County, the Board should consider further code amendments to address EHS permitting requirements as well.

For the foregoing reasons, we respectfully ask the Board to (1) add explicit language allowing stacked uses; (2) find the AEO uses to be compatible with the Williamson Act; and (3) direct staff to streamline other permitting requirements that could delay or prevent agrotourism where it is most needed.

¹ Santa Barbara County, Agricultural Enterprise Ordinance
(<https://www.countyofsb.org/728/Agricultural-Enterprise-Ordinance>).



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Agritourism has numerous advantages. The additional income stream from offering overnight accommodation, with options from farmstays to campgrounds, will be crucial to the success of our agricultural nonprofit. The local community will also benefit from additional tourists visiting our unique region and staying longer—studies show that agritourists will spend more money in the immediate area—eating at nearby restaurants and seeking fresh produce. Agritourism also helps revitalize rural economies, educates the public about agriculture, and preserves agricultural heritage. The goals of agritourism and our goals as a nonprofit fit together seamlessly for the enrichment of our community.

We thank you for your attention to our comments. We are looking forward to working with the County to encourage robust agritourism.

Sincerely,

Steve Finkel, President, White Buffalo Land Trust