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Katherine Douglas *Public Comment*

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**From:** Claire Wineman <claire.wineman@grower-shipper.com>  
**Sent:** Friday, November 1, 2024 12:05 PM  
**To:** sbcob  
**Subject:** Public Comment - D7 Ag Ent Ord  
**Attachments:** GSA SB SLO Ag Enterprise Ordinance BOS 11.1.24.pdf

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Good afternoon,

Please see the attached letter for Tuesday's hearing for item D7, Ag Enterprise Ordinance. I would appreciate if you could please confirm receipt of this message and the attachment.

Thank you,  
Claire

Claire Wineman  
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November 1, 2024

County of Santa Barbara  
Board of Supervisors  
[sbcob@countyofsb.org](mailto:sbcob@countyofsb.org)

Re: November 5, 2024 – D7 Santa Barbara County Agricultural Enterprise Ordinance

Dear Chair Lavagnino and Board of Supervisors:

The Grower-Shipper Association of Santa Barbara and San Luis Obispo Counties represents over 150 growers, shippers, farm labor contractors, and supporting agribusinesses. Our members grow diverse field and nursery crops such as broccoli, strawberries, wine grapes, vegetable transplants, flowers, and tree fruit. We appreciate the continued diligence of the Supervisors, Planning Commission, and Staff in navigating the proposed Ag Enterprise Ordinance. We continue to generally support the stated purpose to allow new uses on AG-II zoned land and to streamline the permit process so as to “expand economic opportunities for farmers and improve the County’s overall agricultural land viability.”

We are writing to continue to advocate for the long-term interest of agriculture in Santa Barbara County. The introduction of the overlay concept is a new and significant development with potential far-reaching ramifications. On behalf of our membership, which primarily grow food crops in the Santa Maria and Lompoc Valleys, we express our support for promoting diverse agriculture throughout Santa Barbara County and several important points of consideration of the prospective Ag Enterprise Ordinance.

The fresh fruit and vegetable crops grown in places like the Santa Maria and Lompoc Valleys are the predominant source of agricultural income and employment in the County and are an important source of food security. More specifically, according to the latest 2023 County of Santa Barbara Crop & Livestock Report, row crops predominantly grown in these valleys account for over 80% of the gross production value of Santa Barbara County, which totaled \$1.8 billion in 2023. While these gross production values are by no means a representation of the take-home profit, if any, they do represent the tremendous community investment—primarily in jobs and wages—followed by other investments like auto sales, restaurants, finance, and professional services.

Promoting and protecting the diversity of agriculture cannot come at the expense of the core functionality of agricultural production activities. As an essential industry, agriculture has not experienced the same timing of economic downturns and hardships as other economic sectors, most especially tourism and recreation, and must maintain a robust piece of the local economy.

To achieve these significant and commendable goals, and after extensive discussion with multiple stakeholders, we recommend the development and implementation of localized, permissive overlays in the specific areas of the County where stakeholders have demonstrated a clear demand and desire for such changes. These overlays would be designed to accommodate and encourage diverse economic opportunities envisioned by the Ordinance, including those centered around tourism and recreation, in locations that would not create conflicts with agriculturalists exercising their Right to Farm and agricultural production endeavors. We would not oppose a limited, permissive overlay considering the unique characteristics of the areas where these types of uses may be more compatible.

As an agricultural advocacy Association, we oppose policies and actions that interfere with the ability of our members to farm, and resulting impacts to employment and food production. We have grave concerns about the prospect of introducing new overlays to Northern Santa Barbara County and how they could be applied in detrimental ways for other, unforeseen purposes in the future. We are concerned that introducing a new, limiting overlay could morph or be applied in new ways in the future beyond its current intended purpose, and inadvertently damage the very agricultural areas and activities that it is intended to protect. We are further concerned that the overlays, as currently contemplated, do not provide equal treatment and protection to our members who farm outside of the boundaries; we also have members who farm both within and outside of the proposed overlays.

Agriculture in general, and especially fresh produce cultivation, faces an incredible and increasing cumulative crush of regulatory layers. Some public comments have mistakenly framed the issue at hand as being “overspray”—which is not the case. Examples of growing constraints and regulatory restrictions include the US FDA Food Safety Modernization Act (FSMA); Leafy Greens Marketing Agreement (LGMA); local, State, and Federal requirements related to materials applications; and private buyer demands.

We believe that a localized, permissive overlay would best accomplish the stated goals, and also continue to advocate for private party agreements as an additional means to resolve the local needs and circumstances of an individual site. As a second alternative, we believe that reinstating setbacks of 1,000 feet from row crops and 400 feet from orchards and vineyards would best protect the vitality of production agriculture countywide and provide more equitable treatment of agricultural operations throughout the County. The language presented to the Planning Commission in Attachment G – Revised Draft Setback Development Standard outlined a viable mechanism for adjusting these setbacks downwards where welcome and appropriate.

We further urge the elimination of compost as a new microenterprise activity, because it could cause the greatest risk to food safety and buyer aversion for crops not generally cooked before being consumed.

We look forward to continued dialogue on how we can best support and enhance agriculture throughout Santa Barbara County in a way that also protects agricultural production for years to come.

Sincerely,



Claire Wineman  
President