

Katherine Douglas

Public Comment - Seaman

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From: Ed Seaman <eseaman3@gmail.com>
Sent: Friday, December 6, 2024 4:51 PM
To: sbcob
Subject: Comment for Nov 10 Ag Enterprise Ordinance Hearing
Attachments: 120624_AEO_Composting_SBBblueberries.pdf; Public Comment - Grower-Shipper Association.pdf

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See attached.

I have also attached the comment submitted by the Grower-Shipper Association that I reference in my comments.

Please verify receipt.

Thanks much,

- Ed Seaman
805-868-0329

[Restoration Oaks Ranch](#)
[Santa Barbara Blueberries](#)
[Wild Farmlands Foundation](#)

SANTA BARBARA BLUEBERRIES

12/06/24

County of Santa Barbara
Board of Supervisors
105 E Anapamu Street,
Santa Barbara, CA 93101

RE: Ag Enterprise Ordinance- Composting
Rebuttal to Grower-Shipper Association

Dear Board of Supervisors:

The future of California agriculture includes nature-based soil nutrition, weed and pest management practices. The synthetic/chemical fertilizers, fumigants, pesticides and herbicides used by many conventional growers in California are being replaced by non-toxic nature-based solutions. Growing practices are changing, driven by science and a well-established public desire to manage climate change and reduce all forms of pollution. This includes sequestering more carbon, improving watersheds, reducing water use, taking pressure off landfills and generally reducing agricultural pollution.

The Heart of Soil Health

Nature-based agricultural practices, including the use of clean compost, support all these public desires. The *active nurturing of soil microbial communities is the heart of soil health*. Synthetic/chemical fertilizers, fumigants, pesticides and herbicides kill soil microbes and their ecosystems. The beneficial microbes die with the pathogens, which degrades the health of the soil. Unhealthy soil does not have much structure or plant-accessible nutrients, so it requires more synthetic/chemical fertilizers to support crops. Unhealthy soil doesn't store carbon or water like healthy soil does. Santa

Barbara already has a significant number of food growers that utilize nature-based solutions in their growing practices, including Santa Barbara Blueberries. Clean compost, sourced from both onsite agricultural materials and purchased (CDFA organic) plant-based compost is foundational to our ongoing soil nutrition program. It is my belief that almost any grower or landowner, regardless of acreage or crop, can use compost and other salient soil feedstocks to transition to and establish nature-based growing practices and improve their soil health in the process. This benefits our food systems, our ecosystems, our communities and the earth.

I was surprised and disappointed when I read the letter from the Grower-Shipper Association to the Board of Supervisors dated November 1, 2024. In particular, the second to last paragraph, "... 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...". There is no qualification of eliminating composting within LAE Overlays, only a blanket recommendation to eliminate composting entirely as a microenterprise activity.

Composting should be encouraged for every food grower in the county, big or small. Urging the elimination of compost at any level is going backwards scientifically, socially and environmentally. This is true inside and outside of the proposed LAE Overlays.

Regarding Compost Safety

There is no pathogen vector for properly finished compost derived from clean source materials. If the concern is whether the compost is properly finished and safe, don't discourage it, focus on adherence to established protocols.

Instead of requiring a Major Conditional Use Permit within LAE Overlays, perhaps the county could **require CDFA certification for composting within LAE Overlays**? Wouldn't this place the bulk of safety and administrative expenses associated with the permitting and oversight of certified composting at the CDFA, saving the county resources and money?

Setbacks

I would personally keep the proposed setbacks exactly as they are: 100 ft setback from lot line, 400 ft setback from existing residence on adjacent lot, 200 ft setback from food crops, orchards, vineyards.

Regarding Customer Aversion to Uncooked Crops

There is no more direct uncooked farm to mouth crop than UPick berries. We have NEVER had customer aversion to our uncooked crops before consumption. Of course, we don't use fumigants, pesticides or herbicides of any kind on our plants or in our fields, and plant-based certified compost is a core ingredient of our nature-based soil nutrition program. Our customers LOVE the fact that we do not use synthetics/chemicals on our farm.

In Summary

Please consider this letter as a measured rebuttal to the objections from the Grower-Shipper Association and any other organizations or individuals that seek to keep composting out of the exempt and Zoning Clearance categories of the Agricultural Enterprise Ordinance.

Please leave the composting section of the Agricultural Enterprise Ordinance pretty much as is. Increasing setback distances would serve no practical purpose. With longer distances, small-scale landowners or producers that would otherwise consider composting as an adjunct operation couldn't. For those in an LAE Overlay, if they are willing to go through CDFA certification before launching, that is an already proven high safety standard that all neighbors should accept. If appropriate, please consider my recommendations to improve the composting section.

With Gratitude,

Ed Seaman



805-868-0329 | eseaman3@gmail.com

President, Santa Barbara Blueberries

Executive Director, Wild Farmlands Foundation

Director of Stewardship, Restoration Oaks Ranch

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Katherine Douglas *Public Comment*

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
President
Grower-Shipper Association
of Santa Barbara and San Luis Obispo Counties
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Santa Maria, CA 93454
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Email: claire.wineman@grower-shipper.com



November 1, 2024

County of Santa Barbara
Board of Supervisors
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