

Katherine Douglas

Public Comment

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From: Ana Citrin <ana.citrin@gaviotacoastconservancy.org>
Sent: Sunday, December 8, 2024 9:13 PM
To: sbcob
Cc: Harris, Julie; Supervisor Das Williams; Laura Capps; Joan Hartmann; Supervisor Nelson; Steve Lavagnino
Subject: Item D.3, AEO, GCC comment letter
Attachments: GCC to BOS_AEO_12-8-24_FINAL.pdf

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Dear Clerk and Supervisors,

Attached please find a letter regarding the Ag. Enterprise Ordinance item on the Board's Tuesday agenda.

With best regards,

Ana Citrin
Legal and Policy Director



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December 8, 2024

Santa Barbara County Board of Supervisors
105 E. Anapamu Street, Suite 407
Santa Barbara, CA 93101

. RE: Departmental Item No. 3, Agricultural Enterprise Ordinance (AEO); Support for Small-Scale Composting and Approval of the AEO

Dear Chair Lavagnino and Honorable Supervisors,

The Gaviota Coast Conservancy (GCC) is committed to permanently protecting the rural character and environmental integrity of the Gaviota Coast for present and future generations. We appreciate the time and effort that has gone into the Agricultural Enterprise Ordinance (AEO), including by County staff and Planning Commissioners, as well as interested stakeholders, other agencies, the Agricultural Advisory Committee (AAC), and Agricultural Preserve Advisory Committee (APAC). GCC supports the AEO's important goal of helping to sustain the economic viability and diversity of agricultural operations in unincorporated areas of Santa Barbara County including the Gaviota Coast.

Through our work with the Gaviota Agricultural Project (GAP), which includes conservation partners at the Community Environmental Council (CEC), Cachuma Resource Conservation District (CRCD), and The Land Trust for Santa Barbara County (LTSBC), we've consistently supported the proposed small-scale composting use. We are pleased that the proposed AEO before your Board includes many of the revisions we proposed and supported to make small scale composting more accessible to County farmers and ranchers. Importantly, the small-scale composting included in the AEO fits within the category of composting facilities exempt from State water quality regulations because they are unlikely to degrade water quality provided specified management practices are implemented. (Order WQ 2020-0012-DWQ) ("Composting General Order"i), ¶ 30). These best management practices, below, are required for all composting operations allowed under the AEO, and function as a safeguard against the inadvertent contamination of crops on neighboring properties.

Best management practices required by the State Composting General Order include that "[m]aterials and activities on site must not cause, threaten to cause, or contribute to conditions of pollution, contamination, or nuisance", "[a]ctivities shall be setback at least 100 feet from the nearest surface water body and/or the nearest water supply well", and "practices [must be implemented] to minimize or eliminate the discharge of wastes that may adversely impact the quality or beneficial uses of waters of the state". (*Id.*)

Moreover, the small-scale composting proposed under the AEO is actually narrower than the category of exempt facilities under the State Composting General Order, so has even less potential for causing contamination. For both the exempt and Zoning Clearance categories proposed under the AEO, only green material, agricultural material, food material, and vegetative food material feedstocks are allowed. (Board Letter, Attachment 4, p. 45, LUDC § 35.42.100.C.3.a-b.) Additionally, new small-scale composting facilities proposed on unincorporated lands zoned AG-II would be required to maintain and follow an Odor Abatement Plan per SBCPACD guidance to address odor issues. (FEIR, p. 3.3-19.)

Incentivizing composting by allowing it as a commercial use has additional benefits to agriculture and the environment. Composting organic material yields environmental benefits by recycling nutrients and diverting materials from landfills, and yields a valuable soil amendment that improves soil tilth and plant health, increases soil water holding capacity, reduces runoff, adds beneficial micro-organisms, adds organic matter, and sequesters carbon. (See SWRCB General Order for Commercial Composting Operations (Order WQ 2020-0012-DWQ) (“Composting General Order”). The Gaviota District Carbon Management Plan (CRCD, 3/2020) explains these benefits in greater detail, including research showing significant and long lasting increases in forage production, soil carbon and soil water holding capacity in response to a single ½-inch or ¼ -inch compost application on grazed sites.ⁱⁱ

In Santa Barbara County, there is inadequate high quality compost available for local farms and ranches to fully realize these benefits including for carbon farming which fights climate change and advances the County’s Climate Action Plan goals. (Id., p. 51.) Carbon sequestration specifically has an important role in the County’s ability to achieve the State’s carbon neutrality goals.ⁱⁱⁱ There is also dwindling landfill capacity at the Tajiguas Landfill which services the unincorporated areas of the south coast of Santa Barbara including the Gaviota Coast where the landfill is located, and the Santa Ynez and New Cuyama Valleys (as well as the cities of Santa Barbara, Goleta, Buellton and Solvang). Moreover, the ReSource Center is focused on organics diversion and to date has not produced compost suitable for agricultural use. Incentivizing small-scale composting on Ag-II parcels throughout the County will result in more high quality compost available to realize on-farm and climate benefits, and more organic waste diverted from landfills.

We encourage the Board to approve the AEO, consistent with the Planning Commission’s recommendations including for small-scale composting. Expanded buffers, including 1,000 feet from adjoining parcels with row crops, unnecessarily limit composting facilities that are already independently prohibited from causing or contributing to conditions of contamination (see Composting General Order, ¶30.)

The AEO was crafted through a lengthy and thorough process, and as proposed strikes an appropriate balance between allowing additional uses on Ag-II lands, while safeguarding agricultural viability and protecting the environment. It’s important that area farms and ranches can begin using the ordinance to establish AEO uses as soon as possible, and the Board

will have the opportunity to revisit the ordinance for fine-tuning after it has been tested in the real world. Please approve the AEO at the December 10th hearing.

Sincerely,



Ana Citrin
GCC Legal and Policy Director

CC: Julie Harris, Senior Planner

ⁱ State Water Resources Control Board, General Waste Discharge Requirements for Commercial Composting Operations, Order WQ 2002-0012-DWQ (April 7, 2020), available at

https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2020/wqo2020_0012_dwq.pdf

ⁱⁱ Gaviota District Carbon Management Plan, available at

<https://www.rcdsantabarbara.org/files/826bc123e/Gaviota+District+C+Management+Plan+final+March+2020.pdf>, pp. 34-35 (Research conducted on northern California rangelands by the Silver Lab at the University of California at Berkeley has shown significant and long lasting increases in forage production, soil carbon and soil water holding capacity in response to a single ½-inch compost application on grazed sites in both coastal and foothill rangelands (Ryals and Silver 2013). Forage production increased by approximately 40% and 70%, respectively. Likewise, soil water-holding capacity increased by nearly 25%, while soil carbon increased by about 0.4 metric tons (1.468 MTCO₂e) per acre per year. These changes have persisted across six years of data collection and ecosystem models suggest this improvement will continue for at least 20-30 years in response to the single compost application. As a note of interest, more recent research suggests that a compost application rate of ¼-inch may be as effective as the ½-inch rate (Ryals et al 2015). A single ¼-inch compost application would require 35 cubic yards of material per acre.)

ⁱⁱⁱ Executive Order B-55-18 (<https://www.countyofsb.org/3142/Carbon-Sequestration>).