



COUNTY OF SANTA BARBARA AGRICULTURAL ADVISORY COMMITTEE

July 9, 2018

Hon. Das Williams, Chair
Santa Barbara County Board of Supervisors
123 East Anapamu Street
Santa Barbara, CA 93101

Re: Gaviota Coast Plan – CCC Suggested Modifications

Dear Chair Williams and Honorable Members of the Board:

The Board of Supervisors created the Agricultural Advisory Committee with a charter to provide County agencies with advice that will help maintain and enhance agriculture as a viable and sustainable industry in Santa Barbara County.

Farming and ranching are an integral part of our County's history and heritage as well as a defining feature of our County's past and current identity through the working landscapes they provide. The stewardship provided by our ranchers and farmers assures that this identity and ethic endures for future generations. Equally important is the recognition that agriculture and ranching are the County's leading industry, accounting for its largest tax revenue source. Our County's ranches and farms also employ the largest numbers of workers in the local community, not only in the industry itself but through the many support companies upon which agriculture depends.

In accordance with our charge of advising the Planning Commission and the Board of Supervisors on policies, ordinances, projects, and programs that have broad implications to agriculture, the Agricultural Advisory Committee (AAC) is pleased to offer comments on the proposed suggested modifications to the Gaviota Coast Plan submitted by the California Coastal Commission staff.

Expansion of ESH designation – CCC Modification #2

Policy NS-4: We support the County's proposal to restore the word "rare" as a qualification for ESH in Policy NS-4; otherwise, almost any vegetation could qualify as ESH. The Commission Staff's proposed modification to Policy NS-4 will have a strangling impact on our ability to engage in practices that may be required by changing market conditions. The requirement of permits for agriculture intensification exposes us to time consuming and expensive applications for a change in agricultural use. *It is the AAC's further recommendation that the historical footprint of*

agricultural operations should not be restricted as long as it doesn't intrude into ESHA.

Policy NS-2: Additionally, the proposed modifications to Policy NS-2 could have the unintended consequences of limiting repairs to existing infrastructure including agricultural water lines and maintenance to existing roads. We believe this proposed modification could limit our operations and result in the requirement for a CDP for traditional agricultural practices.

Dev Std NS-2: Finally, the proposed modification Dev Std NS-2 eliminates the County's flexibility to adjust ESH Setbacks and Buffers based on actual conditions on the ground. The AAC and the Board discussed this issue at length in 2016 and agreed that, based on the site conditions, an ESH setback or buffer could be adjusted upward *or downward*. The CCC staff's proposed modification to the Gaviota Coast Plan stating there can never be an opportunity to create a responsible buffer based on a biological opinion attacks the very idea that this is the County's Local Coastal Plan.

It is the AAC's recommendation that the CCC staff's proposed modifications to NS 2 be rejected in favor of the original GavPlan language approved by the County.

New Definition of Coastal Resources and Permit Requirements for Agricultural Cultivation and Grazing – CCC Modification #13

Section 35-430.C.3: The proposed modification to require a Biological Report for a CDP application will place an unrealistic burden on property owners looking to make improvements to their land. We believe that this modification, and the expanded definition of ESH, has the potential to necessitate a biological report for the entire lot under most any circumstance. ***We ask that this modification not be adopted, or, at a minimum, the biological report limited to the specific project area impacted by residential development and not the entire property.***

CZO Sections 35-430.D: The proposed modification to CZO Sections 35-430.D.2 and 35-430.D.4 which limits "existing" agriculture to a 10 year time period and requires a permit to re-start an agricultural use places an unreasonable burden on landowners to prove historical use. This could be impossible, especially in the case of grazing where land disturbance is minimal and generally undetectable. There is also a due process concern here involving the responsibility to prove historical use on the landowner's shoulders. Additionally, if a permit request is ultimately denied, an onerous Economic Viability Determination is required in order to prove up an adverse economic impact. ***We ask that the CCC staff's recommendations to Policy LU-2 and CZO Section 35-480 be rejected.***

CZO Section 35-430.E.3: Modification #13 also contains a provision in CZO Section 35-430.E.3 and Table 18-2 to narrow principal permitted uses that will exclude agricultural accessory structures, including residential accessory structures. Agricultural accessory structures, including agricultural dwellings would become more difficult to permit. The AAC believes that these limitations are unreasonable. ***The County classifies structures related to agriculture as principal permitted uses and we support that position. We also ask that Accessory Dwelling Units be added to the County's list of accessory uses.***

CZO Section 35-430.E.6a: Also, the proposed modifications include a requirement to cluster agriculture buildings and we ask that the County reject that requirement. We agree that new

development should avoid ESH whenever practical. However barns, stables and other animal keeping facilities should be sited away from dwellings. Also, Farmworker Housing should have remote siting ability for security and privacy reasons. The Williamson Act Uniform Rules already provide for clustering of non-ag structures and we believe that requirement is appropriate for the purpose of keeping the development footprint to a minimum. ***Accordingly, we ask that the clustering requirement be deleted from this proposed Modification.***

Thank you for the opportunity to make these comments.

Sincerely,



Paul Van Leer, Chair

Committee Members

Bradley Miles
Ron Caird
Sharyne Merritt
AJ Cisney
Randy Sharer
Deborah Adam
Claire Wineman
Paul Van Leer, Chair
June Van Wingerden
Brook Williams
Andy Mills, Vice Chair
Jason Sharrett

Representing

1st District Supervisor, Das Williams
2nd District Supervisor, Janet Wolf
3rd District Supervisor, Joan Hartmann
4th District Supervisor, Peter Adam
5th District Supervisor, Steve Lavagnino
California Women for Agriculture
Grower-Shipper Association of SB and SLO Counties
Santa Barbara County Farm Bureau
Santa Barbara Flower & Nursery Growers' Association
Santa Barbara Vintners
Santa Barbara County Cattlemen's Assn.
California Strawberry Commission