



Santa Barbara County Farm Bureau

Affiliated with the California Farm Bureau Federation and the American Farm Bureau Federation

January 19, 2015

Hon. Janet Wolf, Chair
Santa Barbara County Board of Supervisors
105 W. Anapamu Street
Santa Barbara, CA 93101

Reference is made to Coastal Commission Staff Modifications to Ag Buffer Ordinance for Coastal Zone. Modification Nos. 2 and 3.

The Santa Barbara County Farm Bureau has objections to the two proposed modifications made by the Coastal Commission staff in the Ag Buffer Ordinance as it will affect the Coastal Zone

Suggested Modification No. 2 – the addition of E.3:

The County's Agricultural Advisory Committee devoted a great deal of time over the issue of establishing walking and biking trails within the agricultural buffer. These trails could very well be the catalyst for conflicts between agricultural entities and those who would make use of any proposed trails. The placement of trails within the buffer would, by necessity, require the installation of more substantial fencing to protect trail users and their animals (when applicable) from livestock and to protect livestock from those users as well. It has been suggested that perhaps a solid fence may be required to safeguard the operator from claims of damage in the event of chemical applications. Regardless of the type of fencing, the siting of recreational trails in proximity to agricultural operations may foment disputes between the public and agricultural operators, which may culminate in the ultimate loss of agricultural viability.

Andy Mills, President of the Santa Barbara County Cattlemen's Association (SBCCA) has written, "The Commission staff wants to add a new test 'would significantly diminish or result in adverse effects to public access or recreation.' The words 'adverse effects' is such a broad term that it has no real meaning – the Commission staff generally assumes that denying the public a trail has an adverse effect on public access and recreation. In short, this one should not be accepted as written." We certainly concur.

Suggested Modification No. 3 – additional wording for F.d:

We disagree with the wording contained in the second line of the above reference. The uses of "as close as possible" and "as feasible" are not needed. These phrasings can not be used in consonance; either one or the other may be employed, but not both. Obviously the objective of Commission Staff is to restrict whatever fencing is requisite to mitigate the potential consequences identified under Suggested Modification No. 2 above. If fencing or barriers can not impose an adverse impact on scenic resources, their use would not meet the purpose of restricting trespassers and any accompanying animals from agricultural operations and, if it meets the requirement of not excluding wildlife, by consequence it will not exclude domestic

animals thus rendering fencing or barriers ineffectual in protecting livestock, apiary operations, free-range chickens and other animal operations; additionally, protection for orchards from root rot, theft, and potential food safety issues and protection for other agricultural operations would be similarly impaired. If the agricultural operator is required to install an effective fence, it may curtail or impede wildlife movement.

We would ask that County staff consider our comments and those of the SBCCA on these minor modifications in the overarching goal of preparing an agricultural buffer ordinance that ensures that no more productive agricultural land is threatened or converted as a result of encroaching urban development. We believe that the intent of the county mirrors our own in the objective of preserving agricultural viability. The proposed modifications identified above, are not in consonance with that objective. It is very apparent that these modifications have been proposed for the facilitation of trails and not for the protection of agriculture.

Sincerely,

A handwritten signature in black ink, appearing to read "Victor D. Tognazzini", with a long horizontal flourish extending to the right.

Victor D. Tognazzini
President