March 10, 2019

## VIA EMAIL DELIVERY

Santa Barbara County Planning Commission c/o Planning and Development, Hearing Support 123 East Anapamu Street Santa Barbara, CA 93101

RE: Hoop Structure Ordinance Amendment

Dear Commissioners,

At the March 06, 2019 Planning Commission meeting, at approximately 55:25 minutes into the hearing, Commissioner Cooney asked the important question, "What is a hoop house?" More pertinently, at approximately 59:50 minutes into the hearing, he stated, "I suggest the County should define what a hoop house versus a green house is."

This is an important distinction, insomuch as one might effectively convert a hoop house into a greenhouse through several different additions or enhancements to the basic hoop house structure. This prompts the question, "When does a hoop house become a greenhouse?" Interestingly, as the Commission and Board consider the question of hoop house ordinances, I can find nowhere in the public record where there exists a clear answer to Commissioner Cooney's question, "What is a hoop house?" or any definition or delineation of what a hoop house versus a greenhouse is.

This seems like an important matter to consider and clearly define in the present discussions, and so I would like to propose the following definitions:

A hoop house structure shall be classified as a green house in any instance where any one or more of the following conditions are met:

- There is use of any electricity, electrical or mechanical equipment inside of the structure for any purpose other than crop irrigation.
- The structure possesses or is placed over any concrete or other permanent foundation.
- The structure is permanently mounted in the ground.
- The structure uses any full or "hard material" for siding or roofing other than hoop house covering fabric.
- The structure incorporates any structural doors or hard enclosures at the ends of the structure, other than the structure's basic hoop house covering fabric.
- The structure is 20' or greater in height.

Such a definition will serve the community benefit by making it clear what constitutes a hoop house, and any modifications to the hoop house that would reclassify applicable structures that should instead be subject to County regulations pertaining to greenhouse structures.

Thank you sincerely for your consideration,

Bruce Watkins, CEO

Crest and Canyon Management, Inc.