



# VOLUME II: APPENDICES

## AGRICULTURAL ENTERPRISE ORDINANCE

### *Draft Environmental Impact Report*

State Clearinghouse Number: 2021110353

Planning and Development EIR Number: 23EIR-03



*Prepared for:*  
County of Santa Barbara  
Planning and Development Department  
123 East Anapamu Street  
Santa Barbara, CA 93101

*Prepared by:*  
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Santa Barbara, CA 93101

August 2023





**APPENDIX A**  
**NOP AND ENVIRONMENTAL SCOPING DOCUMENT**





# County of Santa Barbara Planning and Development

**Lisa Plowman, Director**

Jeff Wilson, Assistant Director

## NOTICE OF PREPARATION

**DATE:** November 22, 2021

**TO:** State Clearinghouse  
Office of Planning and Research  
1400 Tenth Street  
Sacramento, CA 95814

**FROM:** County of Santa Barbara  
Planning and Development Department  
Long Range Planning Division  
123 East Anapamu Street  
Santa Barbara, CA 93101-2058  
(805) 568-2000

**SUBJECT:** Notice of Preparation and Scoping of an Environmental Impact Report (EIR)

**PROJECT NAME:** Agricultural Enterprise Ordinance

**PROJECT CASE NO.:** 20ORD-00000-00013 and 20ORD-00000-00014

**PROJECT LOCATION:** The Agricultural Enterprise Ordinance (project) involves lands zoned Agricultural in the rural unincorporated areas of Santa Barbara County (inland and coastal).

**LEAD AGENCY:** The County of Santa Barbara is the lead agency preparing the EIR with the purpose of informing decision-makers and the public regarding the potential environmental effects related to the project in compliance with the California Environmental Quality Act (Public Resources Code § 21000 et seq.).

**PROJECT DESCRIPTION:** The Agricultural Enterprise Ordinance proposes to allow a variety of small-scale uses that would be incidental to and compatible with traditional agriculture uses on land zoned AG-II. The goal is to expand economic opportunities for farmers and improve the County's overall agricultural land viability while maintaining the function and character of the County's rural agricultural areas. The primary use of the land must continue to be agriculture (e.g., crop cultivation, ranching/grazing); however, this project would allow local farmers and ranchers to pursue incidental small-scale and compatible agricultural enterprises that support their existing agricultural operations.

The project description, location, and potential environmental effects are included in the attached *Environmental Scoping Document for the Agricultural Enterprise Ordinance*, or if not attached, it may be downloaded from the Planning and Development Department, Long Range Planning Division webpage at: [www.countyofsb.org/AgEnterprise](http://www.countyofsb.org/AgEnterprise).

**VIRTUAL PUBLIC ENVIRONMENTAL SCOPING MEETING:** The Planning and Development Department will hold one virtual environmental scoping meeting using Zoom on

Monday, December 6, 2021 at 5:30 pm. To join on your computer or mobile app, please follow the link below:

<https://countyofsb.zoom.us/j/98727752404>

Or One tap mobile:

US: +12133388477,,98727752404# or +16699006833,,98727752404#

Or Telephone Dial (for higher quality, dial a number based on your current location):

US: +1 213 338 8477 or +1 669 900 6833 or +1 346 248 7799 or +1 602 753 0140 or +1 720 928 9299 or +1 971 247 1195 or +1 206 337 9723 or +1 253 215 8782 or +1 646 518 9805 or +1 651 372 8299 or +1 786 635 1003 or +1 929 205 6099 or +1 267 831 0333 or +1 301 715 8592 or +1 312 626 6799 or +1 470 250 9358 or 833 548 0276 (Toll Free) or 833 548 0282 (Toll Free) or 877 853 5257 (Toll Free) or 888 475 4499 (Toll Free)

Webinar ID: 987 2775 2404

The purpose of the meeting is to receive comments on the scope and content of the environmental issues to be addressed in the EIR.

**PUBLIC AND AGENCY COMMENTS:** We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR prepared by our agency when considering your permit or other approval for the project. Members of the public are also encouraged to provide comments on the scope of the proposed EIR.

Agency and public **comments must be received no later than 5:00 p.m. on Tuesday, December 21, 2021.** Please send your comments and the name of a contact person in your agency to the Project Manager, Julie L. Harris, at the address provided below.

**Planner:** Julie L. Harris  
Long Range Planning Division  
Planning and Development Department  
123 East Anapamu Street  
Santa Barbara, CA 93101

**Telephone:** (805) 568-3543

**Email:** [jharris@countyofsb.org](mailto:jharris@countyofsb.org)

Additional information regarding the project will be posted to the project's webpage as it becomes available at: [www.countyofsb.org/AgEnterprise](http://www.countyofsb.org/AgEnterprise)

cc: County of Santa Barbara Clerk of the Board

Enclosure: Environmental Scoping Document



# County of Santa Barbara Planning and Development

**Lisa Plowman, Director**

Jeff Wilson, Assistant Director

## NOTICE OF PREPARATION

**DATE:** March 8, 2022

**TO:** State Clearinghouse  
Office of Planning and Research  
1400 Tenth Street  
Sacramento, CA 95814

**FROM:** County of Santa Barbara  
Planning and Development Department  
Long Range Planning Division  
123 East Anapamu Street  
Santa Barbara, CA 93101-2058  
(805) 568-2000

**STATE CLEARINGHOUSE NUMBER:** 2021110353

**SUBJECT:** Second Notice of Preparation and Scoping of an Environmental Impact Report (EIR)

**PROJECT NAME:** Agricultural Enterprise Ordinance Revised Project Description

**PROJECT CASE NO.:** 20ORD-00000-00013 and 20ORD-00000-00014

**PROJECT LOCATION:** The Agricultural Enterprise Ordinance (project) involves lands zoned Agricultural in the rural unincorporated areas of Santa Barbara County (inland and coastal).

**LEAD AGENCY:** The County of Santa Barbara is the lead agency preparing the EIR with the purpose of informing decision-makers and the public regarding the potential environmental effects related to the project in compliance with the California Environmental Quality Act (Public Resources Code § 21000 et seq.).

**PROJECT DESCRIPTION:** The Agricultural Enterprise Ordinance proposes to allow a variety of uses that would be incidental to and compatible with traditional agriculture uses on land zoned AG-II. One of the uses (incidental food service) is also proposed to be allowed at wineries located on land zoned AG-I. The goal is to expand economic opportunities for farmers and improve the County's overall agricultural land viability while maintaining the function and character of the County's rural agricultural areas. The primary use of the land must continue to be agriculture (e.g., crop cultivation, ranching/grazing); however, this project would allow local farmers and ranchers to pursue incidental and compatible agricultural enterprises that support their existing agricultural operations.

The project description, location, and potential environmental effects are included in the attached *Environmental Scoping Document for the Agricultural Enterprise Ordinance Revised Project Description*, or if not attached, it may be downloaded from the Planning and Development Department, Long Range Planning Division webpage at: [www.countyofsb.org/AgEnterprise](http://www.countyofsb.org/AgEnterprise).

**PUBLIC AND AGENCY COMMENTS:** We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR prepared by our agency when considering your permit or other approval for the project. Members of the public are also encouraged to provide comments on the scope of the proposed EIR.

Agency and public **comments must be received no later than 5:00 p.m. on April 6, 2022.** Please send your comments and the name of a contact person in your agency to the Project Manager, Julie Harris, at the address provided below.

**Planner:** Julie Harris  
Long Range Planning Division  
Planning and Development Department  
123 East Anapamu Street  
Santa Barbara, CA 93101

**Telephone:** (805) 568-3543

**Email:** [jharris@countyofsb.org](mailto:jharris@countyofsb.org)

Additional information regarding the project will be posted to the project's webpage as it becomes available at: [www.countyofsb.org/AgEnterprise](http://www.countyofsb.org/AgEnterprise)

cc: County of Santa Barbara Clerk of the Board

Enclosure: Environmental Scoping Document

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# County of Santa Barbara Planning and Development

**Lisa Plowman, Director**

Jeff Wilson, Assistant Director

## NOTICE OF PREPARATION

**DATE:** May 5, 2022

**TO:** State Clearinghouse  
Office of Planning and Research  
1400 Tenth Street  
Sacramento, CA 95814

**FROM:** County of Santa Barbara  
Planning and Development Department  
Long Range Planning Division  
123 East Anapamu Street  
Santa Barbara, CA 93101-2058  
(805) 568-2000

**STATE CLEARINGHOUSE NUMBER:** 2021110353

**SUBJECT:** Third Notice of Preparation and Scoping of an Environmental Impact Report (EIR)

**PROJECT NAME:** Agricultural Enterprise Ordinance Revised Project Description

**PROJECT CASE NO.:** 20ORD-00000-00013 and 20ORD-00000-00014

**PROJECT LOCATION:** The Agricultural Enterprise Ordinance (project) involves lands zoned Agricultural in the rural unincorporated areas of Santa Barbara County (inland and coastal).

**LEAD AGENCY:** The County of Santa Barbara is the lead agency preparing the EIR with the purpose of informing decision-makers and the public regarding the potential environmental effects related to the project in compliance with the California Environmental Quality Act (Public Resources Code § 21000 et seq.).

**PROJECT DESCRIPTION:** The Agricultural Enterprise Ordinance proposes to allow a variety of uses that would be incidental to and compatible with traditional agriculture uses on land zoned AG-II. One of the uses (incidental food service) is also proposed to be allowed at wineries located on land zoned AG-I. The goal is to expand economic opportunities for farmers and improve the County's overall agricultural land viability while maintaining the function and character of the County's rural agricultural areas. The primary use of the land must continue to be agriculture (e.g., crop cultivation, ranching/grazing); however, this project would allow local farmers and ranchers to pursue incidental and compatible agricultural enterprises that support their existing agricultural operations.

The project description, location, and potential environmental effects are included in the attached *Environmental Scoping Document for the Agricultural Enterprise Ordinance Revised Project Description*, or if not attached, it may be downloaded from the project webpage at:

<https://www.countyofsb.org/728/Agricultural-Enterprise-Ordinance>

**PUBLIC AND AGENCY COMMENTS:** We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR prepared by our agency when considering your permit or other approval for the project. Members of the public are also encouraged to provide comments on the scope of the proposed EIR.

Agency and public **comments must be received no later than 5:00 p.m. on June 3, 2022.** Please send your comments and the name of a contact person in your agency to the address provided below.

**Contact:** David Lackie  
Long Range Planning Division  
Planning and Development Department  
123 East Anapamu Street  
Santa Barbara, CA 93101

**Telephone:** (805) 568-2023

**Email:** [dlackie@countyofsb.org](mailto:dlackie@countyofsb.org)

Additional information regarding the project will be posted to the project's webpage as it becomes available at: <https://www.countyofsb.org/728/Agricultural-Enterprise-Ordinance>

cc: County of Santa Barbara Clerk of the Board

Enclosure: Environmental Scoping Document



# Environmental Scoping Document

## **for the Agricultural Enterprise Ordinance Revised Project Description**

Project Website:

<https://www.countyofsb.org/728/Agricultural-Enterprise-Ordinance>

Contact:

David Lackie, Supervising Planner  
(805) 568-2023  
[dlackie@countyofsb.org](mailto:dlackie@countyofsb.org)

May 5, 2022

Planning and Development Department  
Long Range Planning Division  
123 E. Anapamu St. • Santa Barbara, CA 93101  
(805) 568-2000

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## 1.0 Purpose

This environmental scoping document describes the proposed Agricultural Enterprise Ordinance (Ag Enterprise or the project), which is part of a multi-phase work program to consider allowing additional uses on lands zoned for agriculture. The future phase will address an additional, broader range of potential uses that are not within the scope of this project.

This revised project description expands upon the previous environmental scoping document (published on March 8, 2022), to also consider the following changes:

- Add farmstays as a proposed use on lands zoned Agricultural II (AG-II) in the unincorporated areas of Santa Barbara County.
- Revise premises acreages to align with established acreage ranges in the Comprehensive Plan Land Use Element and County Zoning Ordinances (e.g., 100 acre and 320 acre minimums). The premises acreage ranges apply to proposed campgrounds, educational experience or opportunity, and small-scale events.

The changes described above are included in Table 5-2.

This environmental scoping document provides a preliminary review of the project's potential environmental impacts in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.). This scoping document, along with comments received in response to the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the project, will assist the County of Santa Barbara, as the lead agency for the preparation of the EIR for the project, in identifying environmental impacts that must be evaluated in the EIR.

## 2.0 Background

CEQA requires the preparation of an EIR to inform the public and decision-makers of the potential environmental effects of the proposed regulations. According to CEQA Guidelines Section 15151, an EIR should include a "sufficient degree of analysis, or scope, to provide decision-makers with information that enables them to make a decision which intelligently takes account of environmental consequences."

The EIR for the project will evaluate the environmental impacts of anticipated activities resulting from the implementing ordinance language. The environmental analysis will be based on the project description and will set forth mitigation measures to be included as development standards or requirements in the ordinance amendments or other documents (e.g., the Agricultural Preserve Uniform Rules) in order to avoid or reduce significant impacts identified in the environmental analysis.

## 3.0 Project Description

This section describes the proposed project, including the applicant/lead agency, project location, project summary, and project adoption and implementation actions.

The following project description is based on general direction from the Board of Supervisors (Board) at its hearing on November 17, 2020, and input provided to staff as part of the following outreach efforts:

- Responses from 137 people to a public survey that was available during the month of March, 2021.

- Three virtual public workshops held on March 24, July 15, and August 30, 2021.
- Two meetings of the Agricultural Advisory Committee held on February 4 and April 1, 2021.
- One meeting of the Land Stewardship and Carbon Farming Coalition (a subcommittee of the Santa Barbara County Climate Collaborative) on May 12, 2021.
- Comments received in response to the first scoping document circulated for public review and comment between November 22, 2021, and December 21, 2021, and at a meeting between members of the agricultural community and the Planning and Development Department Director in December, 2022.

The project description is written broadly to include a range of permitting options (i.e., from an exemption (no permit required), Zoning Clearance, or Land Use Permit/Coastal Development Permit to a Minor Conditional Use Permit/Conditional Use Permit) so the Board may rely on the Final EIR when considering a range of ordinance options that the public and others may recommend. See Section 5.0 below for a description of the permit types.

The project description set forth in this scoping document does not constitute a staff recommendation to the Board on the ordinance options to be evaluated in the EIR. Staff will formulate a recommendation upon completion of the EIR. The development standards set forth in the description below may be modified and/or augmented by mitigation measures that may be identified in the EIR.

### **3.1 Project Applicant/Lead Agency**

The County of Santa Barbara is both the project applicant and the lead agency for the proposed project.

### **3.2 Project Location**

The project would affect lands zoned Agricultural II (AG-II) in the unincorporated areas of Santa Barbara County, including the Coastal Zone. The project would not include lands within Montecito, or lands under the jurisdiction of incorporated cities, the federal government (Los Padres National Forest and Vandenberg Space Force Base), and the University of California (Figure 1). In addition, one of the proposed uses (incidental food service) would also be considered for winery tasting rooms on lands zoned Agricultural I (AG-I) (Figure 2).



### 3.3 Project Overview

The Ag Enterprise Ordinance project is a set of ordinance amendments that consist of two components: (1) a tiered permitting structure that would allow new and incidental, compatible, and supplemental agricultural enterprise uses on certain agricultural lands, and (2) a streamlined permit process for larger structural agricultural developments. Proposed uses include supplemental agricultural support activities, rural recreation, and agricultural tourism. The objectives of the project are to:

- Allow compatible, incidental uses that support and encourage the continuation of local agricultural operations by allowing farmers and ranchers the opportunity to generate supplemental income.
- Allow landowners to explore uses such as composting or camping at lower levels of use without incurring the higher permitting costs associated with these same uses, which currently may be allowed at any size or scale with a Conditional Use Permit.
- Employ a tiered permitting structure that would increase flexibility in permitting – that is, allow lower intensities of use with a permit exemption, Zoning Clearance or Land Use Permit in the Inland Area, or with a Coastal Development Permit in the Coastal Zone.

### 3.4 Summary of Proposed Ordinance Changes

#### 3.4.1 Incidental and Compatible Agricultural Enterprise Uses

The Ag Enterprise Ordinance would amend the County Land Use and Development Code (LUDC) and Coastal Zoning Ordinance (Article II) to expand a tiered permitting structure, first adopted for the Gaviota Coast Plan area, to all lands zoned AG-II. The project builds on these amendments, which established permitting regulations for a variety of small-scale incidental and supplemental uses in the Gaviota Coast Plan area (listed below). The Ag Enterprise project would allow these uses on all lands zoned AG-II countywide and proposes to expand the thresholds for permit exemptions and low-level permits.

Ag processing beyond the raw state (small-scale)	Farmstays
Ag product preparation	Firewood processing and sales
Aquaponics	Fishing operation
Campground	Horseback riding
Composting	Lumber processing/milling
Farm stand	Tree nut hulling

The project also includes several additional uses pursuant to the Board's direction on November 17, 2020:

Cooking classes	Incidental food service
Educational experiences or opportunities	Small-scale events
Farm-to-table dinners	

The proposed new uses would be allowed on lands zoned AG-II countywide. In addition, incidental food service would be considered at winery tasting rooms on lands zoned AG-I, and hunting is also proposed for AG-II. The proposed ordinance amendments would employ a tiered permitting structure that would provide flexible permitting based on the size, scale, and level of intensity of the use and compliance with development standards. Small-scale uses in the Inland

Area might be exempt from planning permits or allowed with a Zoning Clearance or Land Use Permit. In the Coastal Zone, due to the Coastal Act definition of “development” and “principal permitted use,” most uses would likely require a Coastal Development Permit except farm stands that meet specific standards.

To qualify for any of these uses with a permit exemption or a low-level permit, the use must be incidental to, and supportive of, an ongoing agricultural operation located on the property. In addition, to qualify for the exemption or low-level permit the use would need to comply with size and scale criteria, as well as standards such as no additional structural development that would otherwise require a planning permit.

For most of the proposed Ag Enterprise uses, if the use is not allowed with an exemption, Zoning Clearance, or Land Use Permit (because the proposed use does not meet the criteria for the lower level permit), an applicant would have the option to apply for a Minor Conditional Use Permit or Conditional Use Permit to allow the use. A summary of proposed permitting requirements or thresholds for the agricultural enterprise uses is presented in Table 5-2 – Summary of Proposed Ordinance Amendments, beginning on page 15 near the end of this scoping document.

#### 3.4.2 Permit Streamlining for Larger Agricultural Structural Developments

The Ag Enterprise project includes an additional amendment to provide consistent permit streamlining for larger structural development throughout the AG-II zone. In 2010, the Board adopted an ordinance amending the County LUDC that revised the Development Plan thresholds for larger structural agricultural development on lands zoned AG-II. In 2016, the Board adopted, and in 2018, the Coastal Commission certified, this same amendment to Article II with minor modifications, thereby applying it to the Coastal Zone of the Gaviota Coast Plan area. The Ag Enterprise project would amend Article II to apply the same Development Plan thresholds to the remainder of the AG-II zone within the Coastal Zone, an area of approximately 6,327 acres that is located west of the City of Guadalupe (Figure 3).



Figure 3.

Currently, in the Coastal Zone on AG-II zoned lands outside of the Gaviota Coast Plan area, a Development Plan is required when the gross floor area of all structural development cumulatively amounts to 20,000 square feet or more per lot. The proposed Development Plan thresholds would be the same as those adopted for the AG-II zone in the Inland Area and in the Coastal Zone of the Gaviota Coast Plan area, and are based on several combinations of agricultural and non-agricultural structural development and lot size. In brief, a Development Plan would be required when any one of the following gross floor area thresholds is met:

- Non-agricultural structural development would total 15,000 square feet or more, cumulative;
- An individual agricultural structure is proposed to be 15,000 square feet or larger;
- An individual agricultural structure is proposed to be at least 10,000 square feet and there is another 10,000-square foot agricultural structure on the site (i.e., resulting in at least two 10,000-square foot agricultural structures on the lot); or
- The proposed structure(s) will result in a total gross floor area on a lot that exceeds the development plan threshold listed for the applicable lot area as shown in Table 17-1 of

Article II. Total gross floor area includes the gross floor area of agricultural structural development and non-agricultural structural development, both existing and proposed (Article II Subsection 35-430.E.4.a.).

### **3.5 Adoption and Implementation**

The County Planning Commission will consider and advise the Board regarding the adoption of the Ag Enterprise Ordinance. The Board will need to take the following actions in order to implement the project:

1. Adopt environmental findings, certify the EIR, and, if needed, adopt a Statement of Overriding Considerations for any unavoidable, significant environmental impacts that will result from the Project; and
2. Adopt amendments to the County LUDC and Article II to establish the land use regulations for the proposed ag enterprise uses.

In addition to the actions set forth above, the Coastal Commission must certify any amendments to the Local Coastal Program (LCP) – including Article II, as it is the implementing ordinance of the LCP.

## **4.0 Scope of the Environmental Review**

### **4.1 Overview**

CEQA requires the preparation of an EIR to inform the public and decision-makers of the project's potential environmental effects. This includes any potential environmental effects resulting from the allowance of the supplemental uses described in the project description. According to CEQA Guidelines Section 15151, “[a]n EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences.”

### **4.2 Environmental Topics to be Analyzed in the EIR**

CEQA Guidelines Section 15060(d) states that an initial study is not required in cases where preparation of an EIR is determined to be clearly required by the lead agency. Accordingly, an initial study for the project is not provided herein. However, preliminary review of the project identified the following issue areas for evaluation in the EIR. Additional environmental topics beyond what is set forth below might be added to the EIR, based on comments received in response to the NOP for the EIR and Draft EIR that will be prepared for the project.

#### *4.2.1 Aesthetics and Visual Resources*

Santa Barbara County supports a wide range of aesthetic resources, including scenic highways (e.g., State Routes 1 and 154, portion of U.S. Highway 101), scenic natural resources such as the Santa Ynez Mountains, oak woodlands, historic buildings, and areas with panoramic ocean views. As uses accessory and supplemental to agriculture, the proposed uses are intended to blend into the rural landscapes of the County, particularly when they occur within existing structures or do not require physical installations. However, grading or construction to allow some of the uses, and increased activities and visitation that could increase lighting if uses were allowed to occur during evening hours, could affect the visual character of an area. The EIR will assess the project's potential impacts on visual and scenic resources and identify mitigation measures as necessary. This includes a characterization of the existing physical setting; identification of potential impacts

upon the character of scenic areas, gateways, relevant aspects of the built environment, public open spaces, and recognized landmarks; evaluation of consistency with routes in the County designated for protection under California's Scenic Highway Program; and cumulative effects to public vistas and scenic routes.

#### 4.2.2 *Agricultural Resources*

The EIR will describe the existing agricultural operations in the County, including cultivated agriculture, grazing operations, equestrian operations, crop types and acreages, and general locations based on available data from existing sources. The EIR will assess whether the proposed project is consistent with existing agricultural preservation policies and programs or has the potential to result in potentially significant adverse effects to prime soils, State designated important farmlands (Prime, Statewide, Local, or Unique), or grazing lands. The EIR will also assess whether the project will cause potential impacts to agricultural resources, including potential conversion of agricultural land, including Williamson Act lands, to non-agricultural uses or result in land-use conflicts that impact onsite or nearby agricultural operations. The project EIR will identify mitigations for potentially significant impacts, where feasible.

#### 4.2.3 *Air Quality and Greenhouse Gas Emissions*

The EIR will describe existing conditions within the South Central Coast Air Basin and in the project vicinity, including attainment status for criteria pollutants, climatic conditions, local emissions sources, and sensitive receptors, such as schools, elder care facilities, park visitors and adjacent neighborhoods. The EIR will provide a brief description of the current regulatory setting regarding air quality and greenhouse gas emissions, and assess the potential air quality impacts from possible additional development and/or operations that could generate emissions, as well as potential impacts to air quality and greenhouse gas emissions from project-related vehicle miles traveled (VMT). The EIR will identify the need for mitigation or development standards, as necessary, to reduce significant impacts to the maximum extent feasible. It will also assess consistency with the County's 2019 Ozone Plan (previously published as the Clean Air Plan or Air Quality Attainment Plan) and Energy and Climate Action Plan.

#### 4.2.4 *Biological Resources*

Santa Barbara County supports a wide range of habitats, including oak and riparian woodlands, chaparral and coastal sage scrub, vernal pools, native grasslands, and coastal wetlands, which together support dozens of special status or sensitive species. These include rare wildlife species such as the California tiger salamander (*Ambystoma californiense*), southern steelhead trout (*Oncorhynchus mykiss*), and arroyo toad (*Anaxyrus californicus*), among others, and rare plants such as Gaviota tarplant (*Deinandra increscens ssp. Villosa*). Some proposed uses, such as a small fishing operation, would require special review of the existing biological setting and applicable State and local regulations.

The EIR will discuss the special status plant and wildlife species and habitat found within the project area and analyze the potential for significant project-specific and cumulative effects on biological resources. The analysis would be based largely on desktop research using tools such as the California Natural Diversity Data Base, National Wetlands Inventory Maps, habitat maps (e.g., Environmentally Sensitive Habitats maps in the Coastal Zone) or other data from adopted general and community plans, as well as regional plans or State and federal data. The EIR will also identify feasible mitigation measures necessary to reduce or avoid significant impacts to these resources.

#### 4.2.5 *Cultural & Tribal Cultural Resources*

The EIR will assess the potential for archaeological and historical resource impacts from the project including cumulative impacts and identify mitigation measures as necessary. The EIR will summarize the County's Assembly Bill 52 (Public Resources Code Sections 21080.3.1, 21080.3.2, and 21082.3) tribal consultation as needed.

#### 4.2.6 *Geology and Soils*

The EIR will describe the existing geologic setting, including a general characterization of County terrain, soils, seismicity, and other geologic features, such as groundwater basins and faults; and describe the existing regulatory setting, including the Alquist-Priolo Fault Maps, Dibblee Geologic Maps, Natural Resource Conservation Service soils maps, the County's Seismic Safety and Safety Element, Land Use Element, community plans, and Grading Ordinance. The EIR will assess direct, indirect, and cumulative geologic hazards and impacts posed by the project's potential new uses and development, including grading for access roads, and operations of new agricultural enterprise uses; and will identify recommended mitigation measures as needed to address geologic impacts, building from the California Building Code and the County Code.

#### 4.2.7 *Hazards and Hazardous Materials*

The EIR will describe the hazards and hazardous materials setting for the County based on existing reports, databases, and maps; assess impacts associated with hazards and hazardous materials where new agricultural enterprise uses may require a heightened level of review (e.g., processing), expose visitors to existing hazards such as pesticides, or create new hazards such as exposing visitors to potential foodborne illnesses. The EIR will identify mitigation measures, if necessary, to address hazards and hazardous materials, including consideration of existing regulations and best management practices or development standards to address how and where hazards and hazardous materials would occur in relation to the new agricultural enterprise uses. The EIR will further assess the project for consistency with requirements of federal, state, and county regulations of hazardous materials.

#### 4.2.8 *Hydrology & Water Quality*

New development and/or operation of several of the supplemental and accessory ag enterprise uses may impact surface water quality and hydrology through increased grading, vegetation clearing, erosion, and sedimentation or be impacted by flood flows from nearby rivers and creeks. In addition, some ag enterprise uses would require additional water use and wastewater disposal, which might affect surface water quality and/or groundwater quality and resources. The EIR will describe the existing regulatory setting for management of groundwater and surface waters within the County and the existing hydrologic setting, estimate current water use, analyze potential impacts to water supply (including groundwater) and water quality, and identify potential impacts associated with hydrology. The EIR will also review the potential for significant impacts related to water quality and/or drainage/flooding and identify mitigation measures where necessary.

#### 4.2.9 *Land Use and Planning*

The Ag Enterprise Ordinance would apply to the unincorporated rural lands of the County – specifically to all lands zoned AG-II, and to wineries with tasting rooms on lands zoned AG-1, which would be allowed one of the ag enterprise uses. Land use is governed by a range of County policies included in the Comprehensive Plan, as well as a range of County and state regulations

and ordinances. The EIR analysis will examine the project and identify potential land use conflicts and impacts. Potential land use conflicts between agriculture and residences may result from normal agricultural practices, such as noise, dust, light, and odors. The addition of agricultural enterprise uses may create additional noise, traffic, and light concerns. The EIR analysis will also address potential policy consistency issues regarding land use compatibility, resource preservation, rural road geometrics and safety, and other land use issues of possible community concern. The ordinance amendments will also apply in the Coastal Zone; thus, the EIR will assess the consistency of the project with coastal land uses and policies, and any potentially significant adverse effects on coastal resources resulting from the project. Finally, the EIR will identify potential mitigation measures as needed to address any adverse land use impacts.

#### *4.2.10 Noise*

Santa Barbara County's rural area is generally quiet, though agricultural operations can generate noise associated with equipment use, employment, and visitors. The project has the potential to introduce new noise generating uses into rural agricultural areas, including vehicle travel, small-scale events (e.g., use of amplified sound systems), and educational and recreational activities. The EIR will describe the existing noise setting, focusing on noise associated with roadway corridors and agricultural operations, particularly in relation to proximity to sensitive receptors. The EIR will analyze and identify the noise level impacts for the range of agricultural enterprise uses, including identifying the maximum potential construction and operational noise associated with the project to compare against noise standards. Mitigation measures will be identified for locations where sensitive receptors would be exposed to noise levels that exceed regulatory standards or where agricultural enterprise uses would cause a substantial increase in the ambient noise levels for adjoining areas.

#### *4.2.11 Public Services, Utilities, and Recreation*

New uses allowed by the proposed project may increase demand for public services, including fire protection and law enforcement, as well as other services, such as water, wastewater management, and solid waste disposal. While ag enterprise uses would most likely occur on rural agricultural lands served by private onsite wells, some uses may occur on agricultural lands served by water districts (e.g., Goleta Water District). Additionally, most rural areas of the County are designated high fire hazard areas. Response and access to rural agricultural areas can be challenging for first responders. Small-scale agricultural tourism and rural recreation (e.g., campgrounds, horseback riding) would introduce a larger albeit temporary human population onto rural lands farther from first responders.

The EIR will analyze public service, recreation, and utility issues, focusing on services that could be affected by the proposed project. Incremental increases in demand for code enforcement along with other services (e.g., road maintenance) may also occur. The EIR will assess existing service capabilities of applicable public services such as schools, police protection, and fire protection; assess potential increases in demand for other public services associated with the expansion of accessory agricultural and agricultural enterprise uses; and identify project impacts to established service standards, including emergency response standards. Where feasible, mitigation measures will be proposed to reduce or eliminate significant impacts.

#### 4.2.12 Transportation

The County supports a diverse transportation network, including U.S. Highway 101, State Routes 1, 154, 166, and 246, and rural roads accessing agricultural areas in the county. Public transit service, pedestrian, and bicycle facilities are present in virtually all communities in the County, although these become much less prevalent in the more rural AG-II zoned lands of the County. Most rural agricultural roads contain incomplete or no pedestrian and bike facilities and lack safe links to urban communities. Though the scale of the proposed uses under the project is relatively small, they would result in new uses in these rural areas, with the potential for increases in new vehicular trip generation, vehicle miles traveled (VMT), possible safety hazards associated with increased traffic and pedestrian or bicycle use, and limited increases in demand for active transportation linking these new facilities to the communities. These issues may increase if more than one accessory use is allowed on a site.

Transportation impacts may result from the expansion of agricultural enterprise uses as would be allowed by the proposed project. Many of the County's existing AG-II lands and AG-I winery tasting rooms are located in the Rural and Inner-Rural areas accessed by rural roads that are often characterized by narrow travel lanes and limited sight distances. The rural roads also serve a variety of land uses, including agricultural (horse trailers, tractors, etc.), recreational (cyclists), and rural residential uses. The EIR will evaluate existing County traffic volume data, project trip generation/distribution, level of service calculations, VMT impacts, geometric hazards, accident data, and safety issues including evacuation/emergency access; identify potential construction-related traffic impacts; assess the project's long-term operational impacts associated with the expansion of agricultural enterprise uses; evaluate the project's cumulative effects to transportation based on regional development trends; and identify feasible mitigation measures to address significant impacts.

#### 4.2.13 Wildfire

The California Department of Forestry and Fire Prevention (CAL FIRE) identifies much of Santa Barbara County's rural lands as being located within High and Very High Fire Hazards Severity Zones. The project would include a variety of uses that would increase visitation and temporary human populations on rural agricultural lands and increase wildfire ignition sources. The EIR will assess existing conditions as they relate to wildfire risk and evaluate the potential increase in wildfire danger that could result from the project. The EIR will identify mitigation measures where necessary to reduce or eliminate impacts to these resources.

#### 4.2.14 Cumulative Impacts

CEQA Guidelines Section 15355 defines "cumulative impacts" as follows:

*"Cumulative impacts" refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.*

- (a) The individual effects may be changes resulting from a single project or a number of separate projects.*
- (b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts*

*can result from individually minor but collectively significant projects taking place over a period of time.*

The EIR will assess the significant cumulative impacts to which the project may make a “cumulatively considerable” contribution (CEQA Guidelines Section 15130).

### **4.3 Alternatives Analysis**

The EIR will describe a reasonable range of alternatives to the project that would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, as required by CEQA Guidelines Section 15126.6. The alternatives discussion in the EIR will include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the project. The EIR will programmatically describe the major characteristics and significant environmental effects of each alternative. The EIR analysis will also include a brief discussion of each alternative considered but rejected from further analysis in the EIR (CEQA Guidelines Section 15126.6).

### **4.4 Other CEQA Required Discussions**

The EIR will include a section that addresses other issues for which CEQA Guidelines Section 15126 requires analysis beyond the environmental topical areas described above. In this section, the EIR will analyze the project’s additional possible impacts, including growth inducement and significant irreversible environmental changes.

## **5.0 Description of Permit Types and Summary Table of Proposed Ordinance Amendments**

For each of the proposed uses in the Ag Enterprise Ordinance, the Summary Table (Table 5-2) commencing on page 15 presents: (1) a level of use that would allow the use to be exempt from zoning permits (Exempt), and (2) greater intensities of use that could be allowed with a Zoning Clearance (ZC), Land Use Permit (LUP), Coastal Development Permit (CDP), Minor Conditional Use Permit, or Conditional Use Permit (CUP).

A use that is exempt from zoning permits still must comply with applicable standards of the LUDC (Inland Area) or Article II (Coastal Zone). Issuance of an exemption from the Planning and Development Department is not required, but may be obtained upon request.

A ZC is a ministerial zoning permit that Planning and Development Department staff issues for certain development and uses within the Inland Area of the county, to ensure that a project complies with required development standards. A ZC is not noticed and is not appealable.

An LUP is a Planning Director-approved discretionary zoning permit for certain development and uses within the Inland Area of the county. An LUP is not subject to a hearing; however, Department staff issues a public notice of a pending approval decision regarding an LUP, so that neighbors are notified of the potential new development and/or uses that will result from it. An LUP may be appealed.

In the Coastal Zone, due to the Coastal Act definition of “development” and “principal permitted use,” a CDP would be required for all uses except farm stands that meet specific standards. CDPs are Planning Director-approved discretionary zoning permits that are subject to the specific noticing and administrative appeal procedures set forth in Article II, in order to satisfy requirements of the Coastal Act.

Minor CUPs and CUPs are discretionary zoning permits for uses that are typically inappropriate for certain zones but, under certain conditions, may be allowed. Decision-makers must make certain, heightened findings (e.g., findings related to neighborhood compatibility) that differ from other zoning permits, in order to approve Minor CUPs and CUPs. The Zoning Administrator is the decision-maker for Minor CUPs and the County Planning Commission is the decision-maker for CUPs. The hearings for these permits are noticed and the decisions may be appealed to a higher review authority (e.g., Board of Supervisors).

The zoning permit options are summarized in Table 5-1, below.

<b>TABLE 5-1 – PERMIT TYPE SUMMARY</b>				
<b>Permit Type</b>	<b>Noticing</b>	<b>Hearing</b>	<b>Decision-maker</b>	<b>Appealable</b>
ZC	No	No	P&D Director	No
LUP	Yes	No	P&D Director	Yes
CDP	Yes	No	P&D Director	Yes
CDP (H) with hearing	Yes	Yes	Zoning Administrator	Yes
Minor CUP	Yes	Yes	Zoning Administrator	Yes
CUP	Yes	Yes	Planning Commission	Yes

The Board of Supervisors will decide whether the proposed uses and development described in the Summary Table will require a zoning permit and, if so, the type of zoning permit required. This project description provides a broad range of policy options that will be considered in the EIR in order to provide the Board of Supervisors the opportunity to consider these policy options for the Project. All uses in the Summary Table are proposed for the AG-II zone only, unless otherwise stated.

**Table 5-2 – Summary of Proposed Ordinance Amendments**

Use	Descriptions	Exempt	ZC or LUP (Inland) CDP (Coastal Zone)	Minor CUP (ZA) or CUP (PC)
<i>Rural Recreation Uses</i>				
Campground	A site for temporary occupancy by campers which may include individual campsites. May include accommodations for recreational vehicles.	N/A	<p><b># campsites per premises size</b></p> <p>≤ 100 ac – up to 15 sites</p> <p>&gt; 100-320 ac – up to 20 sites</p> <p>&gt; 320 ac – up to 30 sites</p> <p>2 vehicles per campsite</p> <p>Landowner may provide no more than one of the following semi-permanent accommodations per campsite:</p> <ul style="list-style-type: none"> <li>• park trailer</li> <li>• yurt or tent cabin</li> <li>• Airstream or other RV trailer</li> </ul> <p>30 day max stay</p>	<p>Larger campgrounds, guest ranches, or those otherwise not complying with standards for ZC/LUP/CDP may be allowed with CUP per existing regulations</p> <p>(LUDC Subsection 35.42.240.B)</p>
Farmstays	Transient lodging visitor-serving accommodations provided as part of a working farm or ranch operation. Lodging and food service is only available to registered guests of the farmstay operation.			
	Maximum guests/bedrooms	N/A	<p>ZC: 10 guests/4 bedrooms</p> <p>LUP/CDP: 15 guests/6 bedrooms</p>	15 guests/6 bedrooms

Use	Descriptions	Exempt	ZC or LUP (Inland) CDP (Coastal Zone)	Minor CUP (ZA) or CUP (PC)
	Farmstay accommodations	N/A	<p>ZC/CDP: Existing principal dwelling only.</p> <p>LUP/CDP (H): Existing principal dwelling, conversion of existing building/structure, proposed cottage, park trailer, or any combination thereof.</p>	Existing principal dwelling, conversion of existing building/structure, proposed cottage, park trailer, or any combination thereof.
	Location	N/A	<p>ZC/CDP: Existing principal dwelling only.</p> <p>LUP/CDP (H): Clustered in proximity to existing principal dwelling.</p>	Principally clustered in proximity to existing principal dwelling; a portion of accommodations may be located in remote envelope not to exceed 1 acre.

Use	Descriptions	Exempt	ZC or LUP (Inland) CDP (Coastal Zone)	Minor CUP (ZA) or CUP (PC)
Educational Experience or Opportunity	<ul style="list-style-type: none"> <li>• Small guided tours of farm or ranch</li> <li>• Academic and technical training for farmers and ranchers in all areas of the agricultural sciences and agricultural business</li> <li>• Educational workshops and experiences for the general public regarding the agricultural and natural resources on the premises including:                             <ul style="list-style-type: none"> <li>• larger guided farm and ranch tours</li> <li>• botany</li> <li>• bird and wildlife viewing and studies</li> <li>• photography</li> <li>• astronomy</li> <li>• and other similar agricultural, natural resources, and cultural educational experiences</li> </ul> </li> </ul>	<p><b>Small Guided Tours</b> 15 attendees max per small guided tour Not more than 80 small guided tours per year</p> <p><b>Other Educational Experiences or Opportunities</b> ≤ 100 ac – 50 attendees max &gt; 100-320 ac – 75 attendees max &gt; 320 ac – 100 attendees max Not more than 24 days per year</p> <p><b>Annual Maximum Attendance</b> Any combination of small guided tours and other educational experiences or opportunities may be allowed; however, the maximum annual attendance shall not exceed: ≤ 100 ac – 1,200 attendees &gt; 100-320 ac – 1,800 attendees &gt; 320 ac – 2,400 attendees</p>	<p><b>Small Guided Tour Option:</b> 15 attendees max per small guided tour Not more than 128 small guided tours per year</p> <p><b>Other Educational Experiences or Opportunities</b> ≤ 100 ac – 80 attendees max &gt; 100-320 ac – 120 attendees max &gt; 320 ac – 150 attendees max Not more than 24 days per year</p> <p><b>Annual Maximum Attendance</b> Any combination of small guided tours and other educational experiences or opportunities may be allowed; however, the maximum annual attendance shall not exceed: ≤ 100 ac – 1,920 attendees &gt; 100-320 ac – 2,880 attendees &gt; 320 ac – 3,600 attendees</p>	<p>Education activities that do not comply with standards for exemption or ZC/LUP/CDP may be allowed with a Minor CUP per existing regulations as a “similar gathering” (LUDC Subsection 35.42.260.F.9)</p>
Fishing and/or Hunting Operation	The activity of catching/killing fish and/or other animals, either for food or as a sport.	20 participants daily maximum No new structures or additions requiring planning permits	30 participants daily maximum Gross floor area of any new structures is less than 600 sq. ft.	Operation that does not comply with standards for exemption or ZC/LUP/CDP may be allowed with a CUP

Use	Descriptions	Exempt	ZC or LUP (Inland) CDP (Coastal Zone)	Minor CUP (ZA) or CUP (PC)
Horseback Riding <sup>1</sup>	Fee-based rental of horses for riding on the farm or ranch (includes allowing someone to bring own horse to ride on the farm or ranch).	24 participants daily maximum No new structures or additions requiring planning permits	<b>Inland:</b> Operation that does not comply with standards for exemption may be allowed with LUP (LUDC Subsection 35.21.030.E Table 2-1, as part of an equestrian facility)	<b>Coastal:</b> Operation that does not comply with standards for CDP may be allowed with a CUP (Article II Subsection 35-69.4.2)
Incidental Food Service at Winery Tasting Rooms in AG-I and AG-II	Provision of food that is incidental and subordinate to the winery tasting room.	Non-potentially hazardous pre-packaged food (CA Retail Food Code Section 113871.(c) and 114365.5.(b)) (e.g., shelf stable, refrigeration not required)  Potentially hazardous pre-packaged food (CA Retail Food Code Section 113871) (e.g., perishable, may require refrigeration or other temperature control)  Prepackaged meals or picnics (e.g., salads & sandwiches)  Food truck  Catered food	Provision of foods that exceed those allowed through an exemption including an outdoor BBQ or pizza oven that is not part of a food truck or catered food operation <sup>2</sup>  Service limited to the hours of operation of the tasting room	N/A

<sup>1</sup> The LUDC already allows any kind of equestrian facility (including horseback riding and rentals, riding academy or lessons, horse exhibition facilities, etc.) on AG-II with a LUP with no defined size limits or operational restrictions (LUDC Subsection 35.21.030.E, see Recreation section of Table 2-1). This project proposes to allow a small-scale horseback riding operation without a permit. Additionally, the LUDC allows the commercial boarding of animals (including horses) for members of the public without a permit on AG-II provided there are no other equestrian activities that would require the equestrian facility LUP (LUDC Subsection 35.42.060.D Table 4-2). In the Coastal Zone, in general, commercial boarding of animals (including horses) is allowed with a CDP and public riding stables and other equestrian facilities may be allowed with a CUP. Within the Gaviota Coast Plan area, horseback riding is allowed with a CDP with Hearing.

<sup>2</sup> New food preparation area in an existing or new structure may require a change to the winery’s operational Development Plan.

Use	Descriptions	Exempt	ZC or LUP (Inland) CDP (Coastal Zone)	Minor CUP (ZA) or CUP (PC)
<p>Incidental Food Service  (not at winery tasting rooms)</p>	<p>Provision of food that is incidental and subordinate to the primary agricultural use of the property.</p> <p>Incidental food service only allowed in conjunction with another ag enterprise activity that brings the public to the farm or ranch, such as farm stand, u-pick, educational experience or opportunity, horseback riding, fishing operation.</p>	<p>Non-potentially hazardous pre-packaged food (CA Retail Food Code Section 113871.(c) and 114365.5.(b)) (e.g. shelf stable, refrigeration not required)</p> <p>Potentially hazardous pre-packaged food (CA Retail Food Code Section 113871) (e.g., perishable, may require refrigeration or other temperature control)</p> <p>Prepackaged meals or picnics (e.g., salads &amp; sandwiches)</p> <p>Food truck</p> <p>Catered food</p>	<p>Outdoor BBQ or pizza oven that is not part of a food truck or catered food operation but is incidental to another ag enterprise use that brings the public to the farm or ranch.</p>	<p>N/A</p>
<p>Small-Scale Events (Mix and Match)  (winery events are governed by winery ordinance and permits approved thereunder, LUDC Section 35.42.280)</p>	<p>May include any combination of the following:</p> <ul style="list-style-type: none"> <li>• farm-to-table dinners</li> <li>• cooking classes</li> <li>• weddings</li> <li>• receptions</li> <li>• parties</li> <li>• writing or yoga workshops</li> <li>• non-motorized trail runs, bike races, equestrian endurance rides, and similar activities</li> <li>• similar gatherings</li> </ul> <p>Events may be commercial</p>	<p>≤ 100 ac – 50 attendees max</p> <p>&gt; 100-320 ac – 75 max</p> <p>&gt; 320 ac – 100 max</p> <p>Not more than 8 days per year</p> <p>Not more than 2 days per month</p>	<p>≤ 100 ac – 80 attendees max</p> <p>&gt; 100-320 ac – 120 max</p> <p>&gt; 320 ac – 150 max</p> <p>Not more than 12 days per year</p> <p>Not more than 3 days per month</p>	<p>Events that do not comply with standards for exemption or ZC/LUP/CDP may be allowed with Minor CUP pursuant to existing regulations (LUDC Subsection 35.42.260.F.9)</p>

Use	Descriptions	Exempt	ZC or LUP (Inland) CDP (Coastal Zone)	Minor CUP (ZA) or CUP (PC)
<i>Supplementary Agricultural Uses</i>				
Ag Processing Beyond the Raw State (small-scale)	Small-scale processing beyond the raw-state of agricultural products produced on the same site or from other properties. Does not include agricultural uses that are already subject to ag processing standards (e.g., winery or cannabis).	All material to be processed originates from the premises  No new structures or additions that would require planning permits	All material to be processed originates within Santa Barbara, San Luis Obispo, and Ventura counties  No more than 49% of total volume of processed products may originate from off the premises  Any new structures limited to less than 5,000 sq. ft. gross floor area <sup>3</sup>	Ag processing that does not comply with standards for exemption or ZC/LUP/CDP may be allowed with a CUP.
Ag Product Preparation	Drying, freezing, pre-cooling, packaging of ag products, and milling of flour, feed, and grain. Does not include agricultural uses that are already subject to ag processing standards (e.g., winery or cannabis).	All material originates from the premises  No new structures or additions that would require planning permits	All material to be processed originates within Santa Barbara, San Luis Obispo, and Ventura counties  No more than 49% of total volume of processed products may originate from off the premises  Any new structures limited to less than 5,000 sq. ft. gross floor area <sup>3</sup>	Ag product preparation that does not comply with standards for exemption or ZC/LUP/CDP may be allowed with a CUP.
Aquaponics	A closed system of aquaculture in which the waste produced by farmed fish or other aquatic creatures supplies the nutrients for plants grown hydroponically, which in turn purify the water in the system.	No new structures or additions that would require planning permits	Operation that requires new structures or additions that would require planning permits	N/A

<sup>3</sup> Standard is proposed to be consistent with similar existing standards in the LUDC and Article II.

Use	Descriptions	Exempt	ZC or LUP (Inland) CDP (Coastal Zone)	Minor CUP (ZA) or CUP (PC)
Composting	A commercial facility that produces compost from the organic material of the waste stream and is permitted, designed, and operated in compliance with the applicable regulations in California Code of Regulations, Title 14, Division 7.	<p><b>Small General Composting</b></p> <p>Feedstock may be any combination of green material, agricultural material, food material, and vegetative food material</p> <p>Maximum amount of feedstock and compost, alone or in combination on-site at any one time (<math>\leq 100 \text{ yd}^3</math> and <math>\leq 750 \text{ ft}^2</math>)</p> <p>No limit on amount that can be sold or given away annually (14 CCR § 17855(a)(4))</p> <p><b>Agricultural Material Composting</b></p> <p>Agricultural material derived from an agricultural site and returned to the same site or agricultural site owned or leased by the owner, parent, or subsidiary</p> <p>No more than 1,000 cu yd of compost product may be given away or sold annually (14 CCR § 17855(a)(1))</p> <p>Landowner may conduct both operations if they are separated clearly (spatially or otherwise) so that resources and operations are not commingled</p>	<p><b>Small General Composting</b></p> <p>Feedstock may be any combination of green material, agricultural material, and vegetative food material</p> <p>Maximum amount of feedstock and compost, alone or in combination may not exceed 1,000 yd<sup>3</sup> onsite at any one time</p> <p>No limit on amount that can be sold or given away annually</p> <p><b>Agricultural Material Composting</b></p> <p>If feedstock is limited to agricultural material, agricultural material composting operations may handle an unlimited quantity of agricultural material on the site and may sell or give away any or all compost they produce (14 CCR § 17856)</p> <p>Landowner may conduct both operations if they are separated clearly (spatially or otherwise) so that resources and operations are not commingled</p>	<p>Larger operations and/or other composting operations that include food material, vegetative food material, and/or other feedstock materials may be allowed with a CUP pursuant to existing regulations  (LUDC Section 35.42.100)</p>

Use	Descriptions	Exempt	ZC or LUP (Inland) CDP (Coastal Zone)	Minor CUP (ZA) or CUP (PC)
Farm Stand	Revises regulations for farm stands on AG-II to be consistent with state law regulating farm stands (CA Retail Food Code Section 114375).	<p>If a structure is required for sale of ag products, it must occur within an existing agricultural structure or from a separate stand, not exceeding 800 sq. ft.</p> <p>Allows sale of artisanal crafts (up to 20% of floor area)</p> <p>Up to 50 sq. ft. of sales area for bottle water, sodas, &amp; other non-hazardous foods produced offsite.</p>	<p>New farm stand structure up to 1,500 sq. ft. may be allowed</p> <p>Allow sales of artisanal crafts (up to 20% of floor area)</p> <p>Up to 50 sq. ft. of sales area for bottle water, sodas, &amp; other non-hazardous foods produced offsite</p>	N/A
Firewood Processing and Sales	The conversion of raw plant material into firewood and the sale thereof.	<p>All materials shall originate from the premises</p> <p>Premises shall be planted with the source product</p> <p>No new structures or additions requiring planning or water/wastewater permits</p> <p>In compliance with Deciduous Oak Tree Protection and Regeneration ordinance</p>	<p>All material to be processed originates within Santa Barbara, San Luis Obispo, and Ventura counties</p> <p>No more than 49% of total volume of processed products may originate from off the premises</p> <p>No new structures or additions that would require planning permits</p> <p>In compliance with Deciduous Oak Tree Protection and Regeneration ordinance</p>	<p>Operation that does not comply with standards for exemption or ZC/LUP/CDP may be allowed with a CUP</p> <p>In compliance with Deciduous Oak Tree Protection and Regeneration ordinance</p>

Use	Descriptions	Exempt	ZC or LUP (Inland) CDP (Coastal Zone)	Minor CUP (ZA) or CUP (PC)
Lumber Processing/Milling	A facility that produces lumber including dimensional boards and specific shaped items from harvested trees.	N/A	<p>All materials to be processed shall originate within Santa Barbara San Luis Obispo, and Ventura counties</p> <p>No more than 49% of total volume of lumber may originate from off the premises</p> <p>Premises shall be planted with the source product</p> <p>No new structures or additions that would require planning permits</p> <p>In compliance with Deciduous Oak Tree Protection and Regeneration ordinance</p>	<p>Operation that does not comply with standards for exemption or ZC/LUP/CDP may be allowed with a CUP</p> <p>In compliance with Deciduous Oak Tree Protection and Regeneration ordinance</p>
Tree Nut Hulling	Removing the outer hull (also known as the husk) or shell from the nut by manual or mechanical methods.	<p>All material originates from the premises</p> <p>No new structures or additions that would require planning permits</p>	<p>All material to be processed originates within Santa Barbara, San Luis Obispo, and Ventura counties</p> <p>No more than 49% of total volume of processed products may originate from off the premises</p> <p>Any new structures limited to less than 5,000 sq. ft. gross floor area<sup>4</sup></p>	<p>Ag processing that does not comply with standards for exemption or ZC/LUP/CDP may be allowed with a CUP.</p>

<sup>4</sup> Standard is proposed to be consistent with similar existing standards in the LUDC and Article II.

# Summary of Oral Public Scoping Comments

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The County of Santa Barbara Planning and Development Department (P&D) Long Range Planning Division provided the public with several opportunities to comment on the scope of the Environmental Impact Report (EIR) for the proposed Project through the issuance of a Notice of Preparation (NOP) and an Environmental Scoping Document, both of which were made available to Federal, State, and local agencies and interested members of the public through various methods. The NOP and Environmental Scoping Document were advertised to the general public and made available electronically on the County's website. The NOP comment period ran from November 22, 2021, to December 26, 2021. During this time, County P&D Long Range Planning Division also hosted a virtual environmental scoping meeting using Zoom on Monday, December 6, 2021, at 5:30 pm. Comments made during this initial NOP comment period are summarized below. These comments were primarily focused on the scope and details of uses as well as the permitting requirements and development standards comprising the proposed Project rather than the potential environmental impacts and the associated scope of the EIR.

As a result, the County reconsidered the proposed Project and issued a second NOP and Environmental Scoping Document that included a revised Project Description with expanded rural recreational uses (e.g., larger-scale campgrounds, more educational opportunities, and hunting activities) and supplementary agricultural uses. This revised Project Description also expanded upon the original Project Description by clarifying and revising the permitting requirements and development standards for certain uses. The second NOP and Environmental Scoping Document were advertised similarly to the initial NOP and Environmental Scoping Document with a new NOP comment period that ran from March 8, 2022, to April 6, 2022.

A third and final NOP and Environmental Scoping Document was issued to address a final revision to the Project Description to consider the addition of farmstays as a proposed use on lands zoned AG-II. This revised Project Description also adjusted affected premises acreages for proposed campgrounds, educational experiences or opportunities and small-scale events to better align with established acreage ranges in the Land Use Element of the County's Comprehensive Plan and the County's Zoning Ordinances. The third NOP and Environmental Scoping Document were advertised similarly to the initial NOP and Environmental Scoping Documents with a new NOP comment period that ran from May 5, 2022, to June 3, 2022.

## Summary of Oral Public Scoping Comments (December 6, 2021)

### 1. Sam Cohen, Santa Ynez Chumash Tribe

- Tribal cultural resources
  - The scoping document already correctly noted Assembly Bill (AB) 52 applies, and the Santa Ynez Band of Chumash Industry Indians has already given AB 52 Notice to Santa Barbara County.
- Santa Ynez Chumash Tribe's AG-II properties
  - The Tribe has AG-II land in the triangle property at the intersection of State Route (SR) 246 and SR 154.
  - The various kinds of Chumash festivals (i.e., Chumash Powwow, Native American Heritage Celebration's lunch and dance festival) should be included as educational experiences under the ordinance.
- Camping and RV needs to be expanded.
  - The Gaviota model is overly restrictive and is of limited utility.

- Ordinance language should match camping and RV use to accommodate all guests at small-scale events- ensuring that these guests celebrate safely. So, if there are 50 attendees to an event, then ordinance language should accommodate camping and RVs for up to 50 persons.

## **2. Kathleen Rosenthal, *Santa Ynez Valley Resident***

- Neighborhood compatibility is paramount, especially where new uses may be allowed at or near the urban/rural interface, such as between the City of Buellton and the agricultural lands to the west and the 246 corridor - between Alamo Pintado and Refugio Road where AG-II and I-E-I zoning interface.
- Where the term rural is used, equestrian uses and safety need to be considered and included. This is for facilities, transportation corridors, and especially for our safety. For the scoping documents, the agricultural enterprise uses include horseback riding but do not include horse boarding. This service is a badly needed item in the rural areas of our county.
- There needs to be an assessment of wildlife migration corridors for biological resources,
- Page 12 of the transportation section includes equestrian uses in a sentence: “the rural roads also serve a variety of land uses including agricultural, horse trailers, tractors, etc. ... recreational cyclists...” but there it should include equestrians as well. Equestrians often ride along the road shoulders here in Santa Ynez Valley, and we sometimes fear for our safety. These issues need to be taken into account for the EIR for the project.
- Campground is more on the smaller scale. Note that the length of the allowed RV trailers would not accommodate the larger living quarters / trailers that horse campers use these days. Why regulate the trailer at all? What is the purpose of regulating? Seems practically unenforceable.
- If the trailer length is regulated, it needs to be increased to a maximum of 40 feet to allow equitable use of the campgrounds by all recreational users, including equestrians.
- Explain why no more than 50% of total campgrounds may host RV trailers, yurts, and cabins at one time. Does this limit total camping to the campsite at one time, or what is the reasoning is behind this? It's unclear.

## **3. Ana Citrin, *Law Office of Marc Chytilo for Gaviota Coast Conservancy***

- Small-scale composting can improve the economic sustainability of our farms and ranches and has enormous environmental benefits.
- Disappointed to see that, in some respects, the proposed agricultural enterprise uses reduce the already low thresholds in the Gaviota Coast Plan for on-site compost storage from 500 cubic yards (cy) to 100 cubic yards and would retain the 1,000 cy annual limit for off-site transfer of compost. We propose higher numbers here.
- Request that the Draft EIR specifically identifies and evaluates the many environmental benefits derived from compost application and conversion of organic material to compost. And consider a more permissive ordinance language that makes farm composting easier. And that, in turn, will further the county's climate action goals and help mitigate adverse impacts of the agricultural enterprise uses.
- Pollinator hedgerows are also an area where there are enormous environmental benefits. And while the installation of these hedgerows is exempt from permits in the coastal zone, it's not clear that modifying or removing them is similarly exempt. So, it is requested that language be added within existing agricultural operations that encourage this beneficial agricultural practice.

#### **4. Chip Wulbrandt**

- Agrees with Anna Citrin that some of the things that this proposal and this project description are written to be too restrictive.
- Urge that the project description in the NOP be broadened and that all of the very specific and restrictive provisions in the tables that were informed by a survey to not be included.
- With a broader project description and fewer limitations, the environmental document can later develop what restrictions are needed, and the alternatives can be more meaningful.
- NOP does not refer to staff meeting with the Agricultural Enterprise Advisory Committee occurring. NOP should include the project description that the committee developed.
- Added incidental food service and then incidental food service at wineries, but the Santa Barbara Vintners Association provided a formal letter to the County back in April of this year, that urged that the county make permanent- the temporary COVID related-lifting of certain restrictions and the only one that has here been included is one item for incidental food service.
- Note that the incidental food service as it is proposed here is more restrictive than what's allowed under the interim urgency provisions.

#### **5. Tyler Thomas, *Winemaker and Board member for the Santa Barbara Vintners Associations***

- Agrees with comments by Ana Citrin and Chip Wulbrandt
- On the surface, the ordinance has become so restrictive as to lose the spirit of the purpose. It becomes almost cost-prohibitive to make enough money to even consider doing it as it becomes more restrictive.
- Review the letter mentioned earlier as it could be inserted into this as something to be reviewed in the EIR that deals with incidental food service. It has already been operating for over 18 months now with no incidences.
- Concern with the definition of special events. A broader description that the environmental review restricts makes more sense than a restrictive description that is going to do less for agricultural entities.
  - For example, with winery ordinances in AG-II land, an event is not considered an event; it's only a gathering until it is 80 people or more. So the County already has an ordinance with language that suggests that 80 or less is the threshold- but as proposed, the Agricultural Enterprise Ordinance limits to 50.
- The Agricultural Enterprise Ordinance should allow agricultural entities to be as expansive as possible while understanding the spirit of the purpose is to not create primary income out of it.

#### **6. Ed Seaman, *Wild Farmland Santa Barbara Blueberries Restoration Oaks Ranch***

- Agrees with Anna Citrin, Chip Wulbrandt, and Tyler Thomas
- Trying very hard to innovate in an agro-ecology context, regenerative agriculture context, that not only teaches farmers and ranchers by doing it, by demonstrating and moving the needle forward.
- Also wants to educate the public about regenerative agriculture, including the Vermicast.
- Need to educate farmers, ranchers, policymakers and the public about how important composting (a super category with Vermicast being sub category) is to the earth.

## 7. Nancy Emerson, *WE Watch in the Santa Ynez Valley*

- The ordinance only applies to AG-II lands and in addition, some activities on wineries on AG-I. In the initial, WE Watch sponsored discussions about agricultural tourism, and AG-I farmers described the economic need for diversification in order to make farming economically feasible. And so, the question is, how are AG-I farmers need to engage in activities described in this ordinance going to be met?
- Rental horseback riding being the only activity of this kind included in the ordinance. It excludes horseback owners who would like to do trail riding on ranches on their own horses. Should an activity where horse owners, paid a fee perhaps, had rights led by rent personnel be included in this category?
- For educational experience or opportunity, 51 to 80 attendees may be practical for academic and technical training for farmers and ranchers, and some farms or ranches might have such gauging value, that they should be offering such events about every two weeks.
  - Wonders if the number of events needs to be questioned a bit given the differences in purpose and the variety of potential workshops.
  - It may be better to separate the farmer and rancher activities from the educational workshops for the general public.
  - The maximum of 50 and the 51 to 80 participants are even more problematic. With the general public, one purpose is to provide an experience in the agricultural/closer-to-nature environment and 24 times here might begin to overwhelm agricultural activities. But the points on flexibility have been well made earlier by other speakers.
- Question on whether scoping go before the Planning Commission before the staff moves forward with the EIR. Believes the results of this meeting should be absorbed by staff and then presented at the Planning Commission. So commissioners and the public can comment on the final scoping draft.
- For campgrounds: Should farmstays available on a given ranch or farm be considered when one analyzes how much camping should be allowed? And what restroom facilities will be required for campgrounds and what type? That needs to be analyzed in the EIR.
- To what extent will this EIR be categorized and used as a Program EIR and is there any way to prevent an override exemption by the Board of Supervisors? These are problem areas that we have found with other EIRS - particularly with cannabis.

## 8. J. Ritterbeck, *City of Goleta*

- The project description on the first page only mentioned that this was an AG-II plan, yet AG-I is a component, and it was missing in the project description.
- The City of Goleta, in general, is very eager to be supportive of these provisions. There are mutual benefits for the City, but do have some genuine concerns and want to make sure that the City works closely with county staff.
- Some of the particular issue areas of concern are with dark sky in areas north of the City.
  - What kind of signage will be anticipated with these expanded uses for aesthetics? Many of the additional signs would have to go through the City of Goleta to get their permitting.
- As far as air quality and hazards and hydrology, and water quality. The City of Goleta has significant H2S issues with the groundwater in those north of the City. There should be a

significant robust discussion of H2S when looking at expanded uses that will be tapping into the water resources available in those areas.

- Note whether Goleta Water District has weighed in on any additional waters pulled out of any of those basins.
- Note that from experience that Coastal Commission, when aquifers are tapped into for expanded water withdrawal, that saltwater intrusion was one of those issues that the Coastal Commission is also concerned about; even though there are some of these areas aren't reaching down to the coastal area there may be some impacts there.
- Similar to Buellton's comments, concerned about the urban and rural interface and how these expanded uses may impact the City of Goleta. So, make sure that the City of Goleta's land-use plan is also being looked at when looking at the Land Use and Planning section and how some of those uses may impact those and that our city policies are considered.
- For noise, especially at nighttime, what types of hours of operation? Because of the quieter, more rural interface again in a Santa Ana wind bringing, making that noise travel further down into the City.
- For transportation, many of those areas north of the City use city roads exclusively, so not the impacts that will be introduced to the City there.
- Question on why Appendix G in 2021 CEQA document or guidelines isn't being used for these item areas, excluding energy, mineral, population, and housing. So you know what these expanded uses probably bring additional workforce and then additional housing needs, and currently, it is being excluded as part of this discussion. Just want to make sure that those are areas that are covered when the CEQA document is being processed.

# RESPONSES TO WRITTEN SCOPING COMMENTS

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This appendix includes copies of all written comment letters received on the first, second, and third NOPs and a brief response identifying where each individual comment is addressed in the Draft Environmental Impact Report (EIR). **Table A-1** lists all comments and shows the comment set identification number for each letter or commenter. **Table A-2** identifies the location where each individual comment is addressed in the Draft EIR.

**Table A-1. Commenters on the Notices of Preparation**

Individual/Agency/Affiliation	Format of Comment	Date Comment Received	NOP Comment Set
Cuyama Buckhorn	Mail	10/2021	1
Ventura County Air Pollution Control District (APCD)	Email	11/15/2021	2
Lyon	Email	11/22/2021	3
National American Heritage Commission (NAHC)	Mail	11/22/2021	4
Cuyama Valley Food Action Network	Mail	12/2021	5
WE Watch (1)	Mail	12/7/2021	6
Santa Ynez Band of Chumash Indians (1)	Mail	12/08/2021	7
Santa Barbara County Cattlemen's Association	Email	12/13/2021	8
City of Goleta (1)	Email	12/17/2021	9
Gaviota Coast Conservancy (1)	Mail	12/17/2021	10
Heyden (1)	Email	12/18/2021	11
Black (1)	Email	12/20/2021	12
Jones	Email	12/20/2021	13
Van Leer	Email	12/20/2021	14
COLAB	Email	12/21/2021	15
Grower-Shippers of Santa Barbara and San Luis Obispo counties	Mail	12/21/2021	16
Haslett-Barnett	Email	12/21/2021	17
Rosenthal (1)	Mail	12/21/2021	18
Sunstone Winery	Mail	12/21/2021	19
Wullbrandt (1)	Email	01/05/2021	20
Black (2)	Email	03/08/2022	21
Seaman	Email	04/01/2022	22
Merritt	Email	04/03/2022	23
City of Goleta (2)	Email	04/04/2022	24
Douglas	Email	04/04/2022	25
Edalatpour	Email	04/04/2022	26
Heyden (2)	Email	04/04/2022	27
Rosenthal (2)	Email	04/04/2022	28
Santa Ynez Band of Chumash Indians (2)	Email	04/04/2022	29

<b>Individual/Agency/Affiliation</b>	<b>Format of Comment</b>	<b>Date Comment Received</b>	<b>NOP Comment Set</b>
Stauffer	Email	04/04/2022	30
Farnum	Email	04/05/2022	31
Cabugos-Sunstone	Email	04/06/2022	32
Gaviota Coast Conservancy	Email	04/06/2022	33
Gaviota Coast Conservancy LOMC (2)	Email	04/06/2022	34
WE Watch (2)	Email	04/06/2022	35
Wullbrandt (2)	Email	04/06/2022	36
Black (3)	Email	05/05/2022	37
Kessler	Email	05/05/2022	38
Santa Barbara County Air Pollution Control District (SBCAPCD)	Email	05/05/2022	39
Force	Email	05/07/2022	40
National American Heritage Commission (2)	Mail	05/09/2022	41
Department of Conservation	Email	05/27/2022	42
Hipcamp	Email	06/02/2022	43
WE Watch (3)	Email	06/02/2022	44
Taras	Email	06/03/2022	45

**Table A-2. Responses to the NOP Comments**

<b>Comment #</b>	<b>Responses</b>
<b>Comment Received from Cuyama Buckhorn</b>	
1-1	As described further in California Environmental Quality Act (CEQA) Guidelines Section 15131, economic or social effects of a project are not considered to be significant effects on the environment. Economic and social effects of the proposed Project will be considered with environmental factors in reaching a decision on the proposed Project and determining whether any alternatives to the proposed Project are feasible to reduce or avoid the significant effects on the environment identified in the EIR.
<b>Comment Received from Ventura County ACPD</b>	
2-1	Please refer to Section 3.3, <i>Air Quality</i> , which addresses potential impacts on air quality from the proposed uses and related development under the proposed Project
<b>Comment Received from Barbara Lyon</b>	
3-1	Please refer to Section 3.3, <i>Air Quality</i> , Section 3.7, <i>Greenhouse Gas Emissions</i> , and Section 3.11, <i>Noise</i> , which discuss impacts and mitigation measures associated with air pollutants and noise. Your comments will be considered by County decision-makers during their review and consideration of the proposed Project.
<b>Comment Received from NAHC</b>	
4-1	Please refer to Section 3.5, <i>Cultural and Tribal Cultural Resources</i> , for additional information regarding the Assembly Bill (AB) 52 process and all relevant outcomes.
4-2	This EIR has been prepared in accordance with the CEQA Statutes and CEQA Guidelines. Analysis of cultural and tribal cultural resources has been conducted in conformance with the requirements of CEQA and is provided in Section 3.5, <i>Cultural and Tribal Cultural Resources</i> .
<b>Comment Received by Cuyama Valley Food Action Network</b>	
5-1	Your comments will be considered by County decision-makers during their review and consideration of the proposed Project.
<b>Comment Received by WE Watch</b>	
6-1	Cumulative impacts are discussed and analyzed for each resource area in Section 3.0, <i>Environmental Impact Analysis</i> . Discussion of alternatives to the proposed Project, including those considered but discarded, is presented in Chapter 4, <i>Alternatives Analysis</i> .
6-2	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to zoning rules and proposed allowances for unincorporated lands zoned Agriculture I (AG-I). Discussion of alternatives to the proposed Project, including alternatives affecting allowances for unincorporated lands zoned AG-I, is presented in Chapter 4, <i>Alternatives Analysis</i> .
6-3	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances for horseback riding on agricultural zoned lands. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as horseback riding, is presented in Chapter 4, <i>Alternatives Analysis</i> .
6-4	Please refer to Section 3.13, <i>Transportation</i> , which addresses potential impacts on existing and potential roads and trails.
6-5	Please refer to Section 3.10, <i>Land Use and Planning</i> , which addresses compatibility of the proposed Project with the County's long-range planning documents.
6-6	Cumulative impacts are discussed and analyzed for each resource area in Section 3.0, <i>Environmental Impact Analysis</i> .

6-7	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to capacity limits for events. Discussion of alternatives to the proposed Project, including alternatives affecting capacity limits, is presented in Chapter 4, <i>Alternatives Analysis</i> .
6-8	Please refer to Chapter 2, <i>Project Description</i> for a discussion relating to event allowances. Discussion of alternatives to the proposed Project, including alternatives affecting frequency of events, is presented in Chapter 4, <i>Alternatives Analysis</i> .
6-9	Please refer to Section 3.1, <i>Aesthetics and Visual Resources</i> , which addresses issues related to light and glare.
6-10	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
6-11	Thank you for your comment. However, this comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
6-12	Please refer to Section 1.3, <i>Program-Level EIR Analysis</i> for detailed discussion of the purpose of a Program EIR and justification for preparation of a Program EIR for the proposed Project. Under the proposed Project, for an individual agricultural enterprise activity to qualify for exemption, the proposed use must meet with criteria outlined in Chapter 2, <i>Project Description</i> .
<b>Comment Received from Santa Ynez Band of Chumash Indians</b>	
7-1	Please refer to Section 3.5, <i>Cultural and Tribal Cultural Resources</i> , for additional information regarding the AB 52 process and all relevant outcomes.
7-2	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to permitted Educational Events. Discussion of alternatives to the proposed Project, including alternatives affecting educational events, is presented in Chapter 4, <i>Alternatives Analysis</i> .
7-3	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to capacity limits. Discussion of alternatives to the proposed Project, including alternatives affecting campground and RV capacities, is presented in Chapter 4, <i>Alternatives Analysis</i> .
<b>Comment Received from Cattlemen's Association</b>	
8-1	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
8-2	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to zoning rules and proposed allowances for unincorporated lands zoned AG-I. Discussion of alternatives to the proposed Project, including alternatives affecting allowances for unincorporated lands zoned AG-I, is presented in Chapter 4, <i>Alternatives Analysis</i> .
8-3	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to zoning rules and ordinances. Discussion of alternatives to the proposed Project, including alternatives affecting ordinances, is presented in Chapter 4, <i>Alternatives Analysis</i> .
8-4	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to zoning rules. Discussion of alternatives to the proposed Project, including alternatives affecting Coastal Zoning rules, is presented in Chapter 4, <i>Alternatives Analysis</i> .
8-5	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to permit requirements, capacity limits, and facilities. Discussion of alternatives to the proposed Project, including alternatives affecting permits and campsite capacities and facilities, is presented in Chapter 4, <i>Alternatives Analysis</i> .

8-6	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to educational experiences. Discussion of alternatives to the proposed Project, including alternatives affecting educational event permitting requirements, is presented in Chapter 4, <i>Alternatives Analysis</i> .
8-7	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to allowed activities. Discussion of alternatives to the proposed Project, including alternatives affecting allowed activities, is presented in Chapter 4, <i>Alternatives Analysis</i> .
8-8	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances for horseback riding. Discussion of alternatives to the proposed Project, including alternatives affecting horseback riding requirements, is presented in Chapter 4, <i>Alternatives Analysis</i> .
8-9	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to allowed activities. Discussion of alternatives to the proposed Project, including alternatives affecting allowed activities, is presented in Chapter 4, <i>Alternatives Analysis</i> .
8-10	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to allowed activities and permitting requirements. Discussion of alternatives to the proposed Project, including alternatives affecting allowed activities and their permits, is presented in Chapter 4, <i>Alternatives Analysis</i> .
8-11	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances for firewood processing and sale on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting uses involving firewood, is presented in Chapter 4, <i>Alternatives Analysis</i> .
8-12	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to tree nut hulling allowance. Discussion of alternatives to the proposed Project, including alternatives affecting tree nut hulling rules, is presented in Chapter 4, <i>Alternatives Analysis</i> .
8-13	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to aquaculture allowances and permitting requirements. Discussion of alternatives to the proposed Project, including alternatives affecting aquaculture and its permits, is presented in Chapter 4, <i>Alternatives Analysis</i> .
8-14	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to allowed activities and permitting requirements. Discussion of alternatives to the proposed Project, including alternatives affecting allowed activities and their permits, is presented in Chapter 4, <i>Alternatives Analysis</i> .
8-15	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to allowed activities and permitting requirements. Discussion of alternatives to the proposed Project, including alternatives affecting allowed activities and their permits, is presented in Chapter 4, <i>Alternatives Analysis</i> .
8-16	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to allowed activities and permitting requirements. Discussion of alternatives to the proposed Project, including alternatives affecting allowed activities and their permits, is presented in Chapter 4, <i>Alternatives Analysis</i> .
8-17	Per CEQA Guidelines Section 15131, economic effects of a Project are not considered to be significant effects on the environment. Economic effects of the proposed Project will be considered with environmental factors in reaching a decision on the Project and determining whether any alternatives to the proposed Project are feasible to reduce or avoid the significant effects on the environment identified in the EIR.
8-18	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to allowed activities on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting activities and permitting requirements, is presented in Chapter 4, <i>Alternatives Analysis</i> .

8-19	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to the propose uses and related development addressed by the proposed Agricultural Enterprise Ordinance. Discussion of alternatives to the proposed Project is presented in Chapter 4, <i>Alternatives Analysis</i> .
8-20	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed permitting requirements for temporary events on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as temporary events, is presented in Chapter 4, <i>Alternatives Analysis</i> .
8-21	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to allowed activities on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting activities and permitting requirements, is presented in Chapter 4, <i>Alternatives Analysis</i> .
8-22	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
<b>Comment Received from City of Goleta</b>	
9-1	Please refer to Chapter 2, <i>Project Description</i> , for a discussion of applicability to unincorporated lands zoned AG-I and AG-II.
9-2	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
9-3	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to distinctions among unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting classification of unincorporated lands zoned for agriculture, is presented in Chapter 4, <i>Alternatives Analysis</i> .
9-4	Since the EIR does not evaluate legal issues, only physical environmental impacts, your comment will be considered by County decision makers considered by County decision-makers during their review and consideration of the proposed Project.
9-5	The EIR has been prepared based upon the most current iteration of CEQA Guidelines. Impacts related to energy are addressed in Section 3.12, <i>Public Services, Utilities, Energy, and Recreation</i> . Mineral Resources and Population and Housing are addressed in Chapter 5, <i>Other CEQA Considerations</i> .
9-6	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
9-7	Please refer to Section 3.1, <i>Aesthetics and Visual Resources</i> , which addresses issues relating to dark skies impacts, allowances for increased signage, and design requirements.
9-8	Please refer to Section 3.3, <i>Air Quality</i> , which addresses issues relating to impacts on air quality, including hydrogen sulfide gases and annual winds.
9-9	Please refer to Section 3.4, <i>Biological Resources</i> , which addresses potential impacts on biological resources as well as potential mitigation measures.
9-10	The EIR sufficiently addresses both Cultural Resources and Tribal Cultural Resources in accordance with County Thresholds and CEQA Guidelines. Both topics are discussed in Section 3.5, <i>Cultural and Tribal Cultural Resources</i> .
9-11	Please refer to Section 3.8, <i>Hazards and Hazardous Materials</i> , which discusses issues relating to impacts of certain hazards and hazardous materials.

9-12	Please refer to Section 3.9, <i>Hydrology and Water Quality</i> , which discusses potential impacts on water resources, including those relating to water basins, groundwater withdrawal, water usage, and on-site wells.
9-13	Please refer to Section 3.10, <i>Land Use and Planning</i> , which addresses review of General Plans and other land use elements, as well as organizational tools.
9-14	Please refer to Section 3.11, <i>Noise</i> , which discusses potential impacts relating to noise, including sensitive receptors, amplification limits, and other effects.
9-15	Please refer to Section 3.12, <i>Public Services, Utilities, Energy, and Recreation</i> , which addresses issues related to water usage, road maintenance, and recreational uses and their potential impacts and mitigation measures.
9-16	Please refer to Section 3.13, <i>Transportation</i> , which addresses potential impacts on transportation and the methods used to determine significance.
9-17	Cumulative impacts are discussed and analyzed within each resource section of the EIR.
9-18	Please refer to Chapter 4, <i>Alternatives Analysis</i> , which provides analyses for each proposed alternative.
9-19	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
9-20	Please refer to Table 2-2 in Chapter 2, <i>Project Description</i> for discussion relating to specific permitting tiers for individual uses and related development.
9-21	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
9-22	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
<b>Comment Received from Gaviota Coast Conservancy</b>	
10-1	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to allowed activities on unincorporated lands zoned for agriculture.
10-2	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances for composting on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as composting, is presented in Chapter 4, <i>Alternatives Analysis</i> .
10-3	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances for composting on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as composting, is presented in Chapter 4, <i>Alternatives Analysis</i> .
10-4	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances and permitting requirements for composting on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as composting, is presented in Chapter 4, <i>Alternatives Analysis</i> .
10-5	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances and permitting requirements for composting on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting capacity limits for composting, is presented in Chapter 4, <i>Alternatives Analysis</i> .

10-6	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to allowed activities on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting activities and permitting requirements, is presented in Chapter 4, <i>Alternatives Analysis</i> .
10-7	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
10-8	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to permitting requirements on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting activities and permitting requirements, is presented in Chapter 4, <i>Alternatives Analysis</i> .
10-9	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to allowed activities on unincorporated lands zoned for agriculture. Your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
<b>Comment Received from Heyden</b>	
11-1	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to capacity limits and permitting requirements on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting capacity and permitting requirements, is presented in Chapter 4, <i>Alternatives Analysis</i> .
<b>Comment Received from Black</b>	
12-1	Your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
<b>Comment Received from Jones</b>	
13-1	Thank you for your comments. Please refer to Chapter 2, <i>Project Description</i> for discussion relating to sizing limits for RVs and other vehicles. Discussion of alternatives to the proposed Project, including alternatives affecting sizing limits, is presented in Chapter 4, <i>Alternatives Analysis</i> .
13-2	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to capacity limits for campsites. Discussion of alternatives to the proposed Project, including alternatives affecting capacity limits, is presented in Chapter 4, <i>Alternatives Analysis</i> .
13-3	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed permitting requirements and capacities for educational events on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as educational events, is presented in Chapter 4, <i>Alternatives Analysis</i> .
13-4	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed permitting requirements and limits on small-scale events. Discussion of alternatives to the proposed Project, including alternatives affecting frequency and permitting rules for small-scale events, is presented in Chapter 4, <i>Alternatives Analysis</i> .
13-5	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed permitting requirements and capacities for small-scale events. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as small-scale events, is presented in Chapter 4, <i>Alternatives Analysis</i> .
<b>Comment Received from Van Leer</b>	

14-1	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to allowed activities, permitting requirements, land use restrictions, and other topics raised by the Cattlemen’s Association. Discussion of alternatives to the proposed Project, including alternatives affecting land use allowances and restriction, is presented in Chapter 4, <i>Alternatives Analysis</i> .
<b>Comment Received from COLAB</b>	
15-1	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to allowed activities, permitting requirements, land use restrictions, and other topics raised by the Cattlemen’s Association. Discussion of alternatives to the proposed Project, including alternatives affecting land use allowances and restriction, is presented in Chapter 4, <i>Alternatives Analysis</i> .
15-2	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
<b>Comment Received from Grower-Shippers of Santa Barbara and San Luis Obispo Counties</b>	
16-1	Please refer to Section 3.10, <i>Land Use and Planning</i> , which addresses compatibility of the proposed Project with the County’s long-range planning documents. Additionally, cumulative impacts are discussed and analyzed for each resource area in Section 3.0, <i>Environmental Impact Analysis</i> .
16-2	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances and safety measures for composting on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as composting, is presented in Chapter 4, <i>Alternatives Analysis</i> .
16-3	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances for food product preparation and processing on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as food preparation and processing, is presented in Chapter 4, <i>Alternatives Analysis</i> .
<b>Comment Received from Haslett-Barnett</b>	
17-1	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to sizing limits for RVs and other vehicles. Discussion of alternatives to the proposed Project, including alternatives affecting sizing limits, is presented in Chapter 4, <i>Alternatives Analysis</i> .
17-2	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to capacity limits for campgrounds. Discussion of alternatives to the proposed Project, including alternatives affecting capacity limits, is presented in Chapter 4, <i>Alternatives Analysis</i> .
<b>Comment Received from Rosenthal</b>	
18-1	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
18-2	Please refer to Section 3.1, <i>Aesthetics</i> , which addresses potential impacts relating to lighting and other disturbances that may affect nearby neighborhoods; and Section 3.11, <i>Noise</i> , which addresses potential impacts from noise pollution.
18-3	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances for horseback riding and equestrian uses on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as horseback riding, is presented in Chapter 4, <i>Alternatives Analysis</i> .

18-4	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances for equestrian uses, such as horse boarding, on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting equestrian uses, is presented in Chapter 4, <i>Alternatives Analysis</i> .
18-5	Please refer to Section 3.4, <i>Biological Resources</i> , which addresses impacts relating to wildlife migration corridors.
18-6	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances for horseback riding and equestrian uses on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project is presented in Chapter 4, <i>Alternatives Analysis</i> .
18-7	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances for horseback riding and equestrian uses on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project is presented in Chapter 4, <i>Alternatives Analysis</i> .
18-8	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to sizing limits for RVs and other vehicles. Discussion of alternatives to the proposed Project, including alternatives affecting sizing limits, is presented in Chapter 4, <i>Alternatives Analysis</i> .
18-9	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to capacity limits for campgrounds. Discussion of alternatives to the proposed Project, including alternatives affecting capacity limits, is presented in Chapter 4, <i>Alternatives Analysis</i> .
18-10	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to stay limits for campgrounds. Discussion of alternatives to the proposed Project, including alternatives affecting stay limits, is presented in Chapter 4, <i>Alternatives Analysis</i> .
18-11	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to allowed activities on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting educational opportunities, is presented in Chapter 4, <i>Alternatives Analysis</i> .
18-12	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances, permitting requirements, and capacity limits for horseback riding on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project is presented in Chapter 4, <i>Alternatives Analysis</i> .
18-13	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances/permitting requirements for outdoor barbeques on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project is presented in Chapter 4, <i>Alternatives Analysis</i> .
18-14	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
<b>Comment Received from Sunstone Winery</b>	
19-1	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances for overnight stays on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as overnight stays, is presented in Chapter 4, <i>Alternatives Analysis</i> .
19-2	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances for overnight RV stays. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as overnight RV stays, is presented in Chapter 4, <i>Alternatives Analysis</i> .

19-3	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to incidental food service for wineries and other agricultural businesses on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as incidental food service, is presented in Chapter 4, <i>Alternatives Analysis</i> .
19-4	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to capacity limits for larger events on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as large events, is presented in Chapter 4, <i>Alternatives Analysis</i> .
<b>Comment Received from Wullbrandt</b>	
20-1	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to scalability. Discussion of alternatives to the proposed Project, including alternatives affecting scalability, is presented in Chapter 4, <i>Alternatives Analysis</i> .
20-2	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to allowances for small campgrounds on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting small campgrounds, is presented in Chapter 4, <i>Alternatives Analysis</i> .
20-3	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to allowances for small campgrounds on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting small campgrounds, is presented in Chapter 4, <i>Alternatives Analysis</i> .
20-4	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to incidental food service for wineries and other agricultural businesses. Discussion of alternatives to the proposed Project is presented in Chapter 4, <i>Alternatives Analysis</i> .
20-5	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed permitting requirements for events on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project is presented in Chapter 4, <i>Alternatives Analysis</i> .
20-6	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
20-7	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
20-8	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
20-9	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
<b>Comment Received from Black (2)</b>	
21-1	Your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
<b>Comment Received from Seaman</b>	

22-1	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances/permitting requirements for educational opportunities. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as educational activities, is presented in Chapter 4, <i>Alternatives Analysis</i> .
22-2	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances, permitting requirements, and frequency rules for small-scale events. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as small-scale events, is presented in Chapter 4, <i>Alternatives Analysis</i> .
22-3	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances for composting on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project is presented in Chapter 4, <i>Alternatives Analysis</i> .
<b>Comment Received from Merritt</b>	
23-1	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to allowed activities on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project is presented in Chapter 4, <i>Alternatives Analysis</i> .
<b>Comment Received from City of Goleta (2)</b>	
24-1	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
24-2	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
24-3	Since the EIR does not evaluate legal issues, only environmental impacts, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
24-4	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to distinctions among unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting classification of unincorporated lands zoned for agriculture, is presented in Chapter 4, <i>Alternatives Analysis</i> .
24-5	The EIR has been prepared based upon the most current iteration of CEQA Guidelines. Impacts related to energy are addressed in Section 3.12, <i>Public Services, Utilities, Energy, and Recreation</i> . Mineral Resources and Population and Housing are addressed in Chapter 5, <i>Other CEQA Considerations</i> .
24-6	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
24-7	Please refer to Section 3.1, <i>Aesthetics and Visual Resources</i> , which addresses issues relating to dark skies impacts, allowances for increased signage, and design requirements.
24-8	Please refer to Section 3.3, <i>Air Quality</i> , which addresses issues relating to impacts on air quality.
24-9	Please refer to Section 3.4, <i>Biological Resources</i> , which addresses potential impacts on biological resources as well as potential mitigation measures.
24-10	The EIR sufficiently addresses both Cultural Resources and Tribal Cultural Resources in accordance with County thresholds and CEQA Guidelines. Both topics are discussed in Section 3.5, <i>Cultural and Tribal Cultural Resources</i> .

24-11	Please refer to Section 3.8, <i>Hazards and Hazardous Materials</i> , which discusses issues relating to impacts of certain hazards and hazardous materials.
24-12	Please refer to Section 3.9, <i>Hydrology and Water Quality</i> , which discusses potential impacts on water resources, including those relating to water basins, groundwater withdrawal, water usage, and on-site wells.
24-13	Please refer to Section 3.10, <i>Land Use and Planning</i> , which addresses consistency with the Land Use Element of the County's Comprehensive Plan elements as well as other long-range planning documents.
24-14	Please refer to Section 3.11, <i>Noise</i> , which discusses potential impacts relating to noise, including sensitive receptors, amplification limits, and other effects.
24-15	Please refer to Section 3.12, <i>Public Services, Utilities, Energy, and Recreation</i> , which addresses potential impacts to public services and utilities.
24-16	Please refer to Section 3.13, <i>Transportation</i> , which addresses potential individual and cumulative impacts on transportation and the methods used to determine significance.
24-17	Cumulative impacts are discussed and analyzed within each resource section of the EIR, in accordance with the most current iteration of the County's <i>Environmental Thresholds and Guidelines Manual</i> .
24-18	Please refer to Chapter 4, <i>Alternatives Analysis</i> , which provides analyses for each of the alternatives to the proposed Project carried forward for further analysis.
24-19	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
24-20	This comment does not directly pertain to the analysis conducted as part of the EIR but will be considered by decision makers in the review process of the proposed Project.
24-21	Please refer to Table 2-2 in Chapter 2, <i>Project Description</i> for discussion relating to specific permitting tiers for individual uses and related development.
24-22	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
<b>Comments Received from Douglas</b>	
25-1	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to allowed activities on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting activities such as hunting and permitting requirements, is presented in Chapter 4, <i>Alternatives Analysis</i> .
<b>Comment Received from Edalatpour</b>	
26-1	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to allowed activities on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting activities such as hunting and permitting requirements, is presented in Chapter 4, <i>Alternatives Analysis</i> .
<b>Comment Received from Heyden (2)</b>	
27-1	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances/permitting requirements for horseback riding and camping on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as camping, is presented in Chapter 4, <i>Alternatives Analysis</i> .

27-2	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to permitting requirements and limitations for small-scale events on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as small-scale events, is presented in Chapter 4, <i>Alternatives Analysis</i> .
<b>Comment Received from Rosenthal (2)</b>	
28-1	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances for equestrian uses on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project is presented in Chapter 4, <i>Alternatives Analysis</i> .
28-2	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances for equestrian uses, such as horse boarding, on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project is presented in Chapter 4, <i>Alternatives Analysis</i> .
28-3	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances for equestrian uses on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project is presented in Chapter 4, <i>Alternatives Analysis</i> .
28-4	This comment does not directly pertain to the analysis conducted as part of the EIR but will be considered by decision makers in the review process of the proposed Project.
28-5	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances/permitting requirements for horseback riding on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project is presented in Chapter 4, <i>Alternatives Analysis</i> . All of your comments and suggestions will be considered in the review process for the proposed Project.
<b>Comment Received from Santa Ynez Band of Chumash Indians (2)</b>	
29-1	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed permitting requirements and zoning rules for campgrounds on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as camping, is presented in Chapter 4, <i>Alternatives Analysis</i> .
29-2	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to incidental food service, as well as outdoor serving of alcohol, at wineries and other agricultural businesses on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as incidental food and beverage service, is presented in Chapter 4, <i>Alternatives Analysis</i> .
29-3	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed permitting requirements and zoning rules for campgrounds. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as camping, is presented in Chapter 4, <i>Alternatives Analysis</i> .
29-4	Your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
<b>Comment Received from Stauffer</b>	
30-1	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to allowed activities on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting activities such as hunting and permitting requirements, is presented in Chapter 4, <i>Alternatives Analysis</i> .
<b>Comment Received from Farnum</b>	
31-1	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to allowed activities on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting activities such as hunting and permitting requirements, is presented in Chapter 4, <i>Alternatives Analysis</i> .
<b>Comment Received from Cabugos-Sunstone</b>	

32-1	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances for overnight experiences on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as overnight stays, is presented in Chapter 4, <i>Alternatives Analysis</i> .
32-2	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances for overnight RV experiences on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as overnight RV stays, is presented in Chapter 4, <i>Alternatives Analysis</i> .
32-3	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to incidental food service at winery tasting rooms and other agricultural businesses on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as incidental food service, is presented in Chapter 4, <i>Alternatives Analysis</i> .
32-4	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances for large events on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as large events and their capacities, is presented in Chapter 4, <i>Alternatives Analysis</i> .
<b>Comment Received from Gaviota Coast Conservancy</b>	
33-1	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to retainment of other plans. Discussion of alternatives to the proposed Project, including alternatives affecting other plans, is presented in Chapter 4, <i>Alternatives Analysis</i> .
33-2	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to retainment of existing zoning restrictions. Discussion of alternatives to the proposed Project, including alternatives affecting existing zoning restrictions, is presented in Chapter 4, <i>Alternatives Analysis</i> .
33-3	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
33-4	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed limitations for campgrounds on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as camping, is presented in Chapter 4, <i>Alternatives Analysis</i> .
33-5	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed size limits for RVs and other vehicles on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting RV rules, is presented in Chapter 4, <i>Alternatives Analysis</i> .
33-6	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed capacity limits for campgrounds on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as camping, is presented in Chapter 4, <i>Alternatives Analysis</i> .
33-7	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed length-of-stay limits on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as camping and overnight stays, is presented in Chapter 4, <i>Alternatives Analysis</i> .
<b>Comment Received from Gaviota Coast Conservancy LOMC (2)</b>	
34-1	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to allowed activities on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting allowed activities, is presented in Chapter 4, <i>Alternatives Analysis</i> .

<b>Comment Received from WE Watch (2)</b>	
35-1	This comment does not directly pertain to the analysis conducted as part of the EIR but will be considered by decision makers in the review process of the proposed Project.
35-2	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to allowed activities on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project is presented in Chapter 4, <i>Alternatives Analysis</i> .
35-3	This comment does not directly pertain to the analysis conducted as part of the EIR but will be considered by decision makers in the review process of the proposed Project.
35-4	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to allowed activities on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project is presented in Chapter 4, <i>Alternatives Analysis</i> .
35-5	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
35-6	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
35-7	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
35-8	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
35-9	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
35-10	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to zoning and permitting requirements on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting zoning and permitting requirements, is presented in Chapter 4, <i>Alternatives Analysis</i> .
35-11	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
35-12	Cumulative impacts are discussed and analyzed for each resource area within Section 3.0, <i>Environmental Impact Analysis</i> .
35-13	Please refer to Section 3.12, <i>Public Services, Utilities, Energy, and Recreation</i> , for a discussion of enforcement implications.
35-14	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
35-15	Please refer to Section 3.3, <i>Air Quality</i> , and the cumulative impacts discussions throughout the EIR for a discussion of potential individual and cumulative impacts on air quality.

35-16	Please refer to Section 3.4, <i>Biological Resources</i> , which addresses impacts relating to the Deciduous Oak Tree Protection and Regeneration Ordinance.
35-17	Please refer to Section 3.13, <i>Transportation</i> , which addresses impacts relating to on-site parking.
35-18	Please refer to Section 3.10, <i>Land Use and Planning</i> , which addresses impacts relating to indoor and outdoor lighting.
35-19	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
35-20	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
35-21	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed RV size and quantity limitations on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting RV use, is presented in Chapter 4, <i>Alternatives Analysis</i> .
35-22	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances for facilities on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting different facilities, is presented in Chapter 4, <i>Alternatives Analysis</i> .
35-23	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
35-24	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed capacity limitations on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting capacity, is presented in Chapter 4, <i>Alternatives Analysis</i> .
35-25	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed capacity limitations on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting capacity, is presented in Chapter 4, <i>Alternatives Analysis</i> .
35-26	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to allowed activities and practices on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting quality of activities, is presented in Chapter 4, <i>Alternatives Analysis</i> .
35-27	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
35-28	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to allowed activities on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting activities such as hunting, is presented in Chapter 4, <i>Alternatives Analysis</i> .
35-29	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.

35-30	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
35-31	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed capacity limitations and permitting requirements on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project is presented in Chapter 4, <i>Alternatives Analysis</i> .
35-32	Please refer to Section 3.3, <i>Air Quality</i> , which addresses potential impacts relating to air quality and odor.
35-33	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
35-34	Please refer to Section 3.3, <i>Air Quality</i> , which addresses potential impacts relating to odor.
35-35	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances/permitting requirements for farm stands on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as farm stands, is presented in Chapter 4, <i>Alternatives Analysis</i> .
35-36	Please refer to Sections 3.3, <i>Air Quality</i> , 3.11, <i>Noise</i> , and 3.14, <i>Wildfire</i> for discussions on potential impacts from firewood and lumber.
35-37	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
<b>Comment Received from Wullbrandt (2)</b>	
36-1	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to allowed activities and permitting requirements on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting activities and permitting requirements, is presented in Chapter 4, <i>Alternatives Analysis</i> .
36-2	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances/permitting requirements for campgrounds on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as camping, is presented in Chapter 4, <i>Alternatives Analysis</i> .
36-3	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances/permitting requirements for small-scale events, educational opportunities, and wineries on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project is presented in Chapter 4, <i>Alternatives Analysis</i> .
36-4	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances for wineries on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project is presented in Chapter 4, <i>Alternatives Analysis</i> .
36-5	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to allowed activities and permitting requirements on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project is presented in Chapter 4, <i>Alternatives Analysis</i> .
36-6	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to permitting requirements and size restrictions for farm stands on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project is presented in Chapter 4, <i>Alternatives Analysis</i> .
<b>Comment Received from Black (3)</b>	

37-1	Your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
<b>Comment Received from Kessler</b>	
38-1	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances and permitting requirements for barbecues and pizza ovens on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project is presented in Chapter 4, <i>Alternatives Analysis</i> .
<b>Comment Received from SBCAPCD</b>	
39-1	Thank you for your comment.
<b>Comment Received from Force</b>	
40-1	Thank you for your comment. Please refer to Section 3.1, <i>Aesthetics and Visual Resources</i> , which addresses potential impacts and mitigation measures relating to visual resources.
<b>Comment Received from NAHC (2)</b>	
41-1	Please refer to Section 3.5, <i>Cultural and Tribal Cultural Resources</i> , for additional information regarding the AB 52 process and all relevant outcomes.
41-2	This EIR has been prepared in accordance with the CEQA Statutes and CEQA Guidelines. Analysis of cultural and tribal cultural resources has been conducted in conformance with the requirements of CEQA and is provided in Section 3.5, <i>Cultural and Tribal Cultural Resources</i> .
<b>Comment Received from Department of Conservation</b>	
42-1	Pursuant to CEQA Guidelines, all feasible mitigation measures are addressed in the environmental review for the proposed Project.
42-2	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
42-3	Please refer to Sections 3.10, <i>Land Use and Planning</i> , and 3.12, <i>Public Services, Utilities, Energy, and Recreation</i> , which address potential impacts on current and future agricultural operations relating to land use conflicts and agricultural support infrastructure.
42-4	Cumulative impacts, incremental impacts, and thresholds of significance are discussed and analyzed within for each resource area in Section 3.0, <i>Environmental Impact Analysis</i> .
42-5	Please refer to Section 3.10, <i>Land Use and Planning</i> , which addresses compatibility of the Project the County's long-range planning documents.
<b>Comment Received from Hipcamp</b>	
43-1	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to zoning rules and proposed allowances for unincorporated lands zoned AG-I. Discussion of alternatives to the proposed Project, including alternatives affecting allowances for unincorporated lands zoned AG-I, is presented in Chapter 4, <i>Alternatives Analysis</i> .
43-2	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to zoning rules and proposed allowances for AG-I zoned lands. Discussion of alternatives to the proposed Project, including alternatives affecting allowances for unincorporated lands zoned AG-I, is presented in Chapter 4, <i>Alternatives Analysis</i> .
<b>Comment Received from WE Watch (3)</b>	
44-1	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.

44-2	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
44-3	Please refer to Section 3.10, <i>Land Use and Planning</i> , which addresses compatibility of the proposed Project with the County's long-range planning documents.
44-4	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
44-5	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
44-6	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to capacity limitations on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting capacity limits, is presented in Chapter 4, <i>Alternatives Analysis</i> .
44-7	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
44-8	Please refer to Section 3.11, <i>Noise</i> , which addresses potential impacts relating to amplification factors and sound barriers.
44-9	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances for campgrounds on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as camping, is presented in Chapter 4, <i>Alternatives Analysis</i> .
44-10	Please refer to Section 3.4, <i>Biological Resources</i> , for a discussion of potential impacts to wildlife.
44-11	This comment does not directly pertain to the analysis conducted as part the EIR, which has been prepared in accordance with the requirements of the CEQA. Nevertheless, your comment will be considered by County decision-makers during their review and consideration of the proposed Project.
44-12	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances, permitting requirements, and capacity limits for incidental food service and small-scale events. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as these, is presented in Chapter 4, <i>Alternatives Analysis</i> .
44-13	Thank you for your comments. Please refer to Chapter 2, <i>Project Description</i> for discussion relating to proposed allowances for composting on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting uses such as composting, is presented in Chapter 4, <i>Alternatives Analysis</i> . All of your concerns and suggestions will be considered by decision makers in the review process of the proposed Project.
<b>Comment Received from Taras</b>	
45-1	Please refer to Section 3.11, <i>Noise</i> , for a discussion of potential impacts relating to noise pollution as well as discussion of sensitive receptors and feasible mitigation measures.

45-2	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to allowed activities on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting activities such as farm stays, is presented in Chapter 4, <i>Alternatives Analysis</i> .
45-3	Please refer to Chapter 2, <i>Project Description</i> for discussion relating to allowed activities on unincorporated lands zoned for agriculture. Discussion of alternatives to the proposed Project, including alternatives affecting activities such as farm stays, is presented in Chapter 4, <i>Alternatives Analysis</i> .

# CUYAMA BUCKHORN

To Whom It May Concern,

October 2021

We are a small, boutique resort located in Cuyama, California. Since purchasing Cuyama Buckhorn in 2018, one of our main missions has been to form partnerships with the farms and ranches of our valley in order to strengthen our rural community, support our local economy and work to relocalize our food system. We are pleased to say that we now source from most of the local farms in our valley for our restaurant, bar, market and mini bars. Highlighting these partnerships is a major part of our overall business mission. We are now trying to take this mission one step further by encouraging our guests to visit our farm partners in order to learn about their growing practices and why it is so important to source food locally, as well as encourage our guests to support these local, small-scale farms, ranches and vineyards by purchasing their goods directly.

We believe that teaching people about where their food comes from and how it is grown will help localize food systems and strengthen local economies, which is our mission as a farm-to-table restaurant. There is no better way for people to learn this, than by actually visiting the farms and ranches that produce our food and hearing first-hand from the people growing our food.

Additionally, because we are located in a rural community we are very limited in terms of tourism activities for guests to experience in the valley. One of the goals for our valley is to create agro-tourism initiatives, in order to support the tourism industry of our valley. We have guests ask if they can visit the farms, ranches and vineyards that we work with on a regular basis and we hope to be able to set up more opportunities with our farm, ranch and vineyard partners, so that we can offer this to our guests and use this as a way to help drive more tourism to our valley.

The current proposal for this ordinance is incredibly unrealistic to pursue for small-scale farms, ranches and vineyards. The fees are much too high and the process is much too rigorous to be possible for small local farms and ranches, especially in our remote, rural community. To apply for these permits our local farmers and ranchers would have to leave our valley to visit local county offices which would be incredibly time-consuming due to our location. Additionally, the fees for the application and ongoing programming are much too high for many of the small farms, ranches and vineyards of our valley to ever be able to afford. We hope that these barriers can

1-1

1-1  
cont'd



## VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

### Memorandum

TO: Ms. Julie Harris, Long Range Planning Division

DATE: November 15, 2021

FROM: Nicole Collazo, Air Quality Specialist, Planning Division 

SUBJECT: NOP for proposed Agricultural Enterprise Ordinance Santa Barbara County (RMA 21-023)

Ventura County Air Pollution Control District (VCAPCD) staff has reviewed the of Preparation (NOP) of an Environmental Impact Report (EIR) for the proposed project referenced above (project). The Agricultural Enterprise Ordinance will amend the County Land Use and Development Code (LUDC) and the Coastal Zoning Ordinance (Article II) to: (1) identify and allow certain compatible small-scale uses that would support and encourage the continuation of farming and ranching on agricultural lands countywide, and (2) revise and/or develop permit requirements to allow these uses.

Even though the project will be located within Santa Barbara County and in the jurisdiction of the Santa Barbara Air Pollution Control District, some of the potential operations that would result should the ordinance be approved would be adjacent to the Ventura County line. As a result, we recommend the EIR include discussion of how potential noxious odors will be mitigated from proposed new uses, such as composting, firewood processing, agricultural processing, etc. so that sensitive receptors near the county border are not affected.

2-1

Thank you for the opportunity to review the project. If you have any questions, you may email me at [nicole@vcapcd.org](mailto:nicole@vcapcd.org).

**From:** [barbara lyon](#)  
**To:** [Harris, Julie](#)  
**Subject:** Public Comment - Environmental Scoping Meeting | Ag Enterprise Ordinance  
**Date:** Monday, November 22, 2021 11:27:10 AM

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**Caution:** This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Hi! And thanks for the opportunity to comment.

I really don't know anything about this subject, but read your [Notice of Preparation and Environmental Scoping Document](#) and found it wonderfully thoughtful and complete. I don't know if or why, if not, there ever were restrictions on farmers and ranchers use of part of their own lands for public visitation, and want to give my two cents to encourage it. Farmers and ranchers are almost always very environmentally conscious and conscientious in their care of their lands, though it does seem a good idea to keep a check on noise of toxic pollutants when they arise. It just sounds wonderful to afford them and us in the public the opportunity to provide venue for such farm-to-table, weddings, receptions and other events in beautiful serene settings!

3-1

Thanks!

Barbara Lyon  
Santa Barbara  
3rd Generation Californian  
Granddaughter of First CA Citrus Rancher



## NATIVE AMERICAN HERITAGE COMMISSION

November 22, 2021

Julie Harris  
Santa Barbara County Planning & Development  
123 E. Anapamu St.  
Santa Barbara, CA 93101

CHAIRPERSON  
**Laura Miranda**  
Luiseño

VICE CHAIRPERSON  
**Reginald Pagaling**  
Chumash

PARLIAMENTARIAN  
**Russell Attebery**  
Karuk

COMMISSIONER  
**William Mungary**  
Paiute/White Mountain  
Apache

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**Sara Dutschke**  
Miwok

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**Buffy McQuillen**  
Yokayo Pomo, Yuki,  
Nomlaki

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Luiseño

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(916) 373-3710  
[nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)  
[NAHC.ca.gov](http://NAHC.ca.gov)

**Re: 2021110353, Agricultural Enterprise Ordinance Amendments Project, Santa Barbara County**

Dear Ms. Harris:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b))). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1))). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

**Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

## AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

  - a. A brief description of the project.
  - b. The lead agency contact information.
  - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
  - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

  - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

  - a. Alternatives to the project.
  - b. Recommended mitigation measures.
  - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:

  - a. Type of environmental review necessary.
  - b. Significance of the tribal cultural resources.
  - c. Significance of the project's impacts on tribal cultural resources.
  - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

  - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
  - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
    - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
    - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - i.** Protecting the cultural character and integrity of the resource.
    - ii.** Protecting the traditional use of the resource.
    - iii.** Protecting the confidentiality of the resource.
  - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
  - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
  - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
  - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)

## SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf).

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

### NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([http://ohp.parks.ca.gov/?page\\_id=1068](http://ohp.parks.ca.gov/?page_id=1068)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
  - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

4-2

3. Contact the NAHC for:
  - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
  
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
  - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
  - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
  - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subs. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

4-2  
cont'd

If you have any questions or need additional information, please contact me at my email address:

[Andrew.Green@nahc.ca.gov](mailto:Andrew.Green@nahc.ca.gov).

Sincerely,



Andrew Green  
Cultural Resources Analyst

cc: State Clearinghouse

December 2021

To: Julie Harris, Long Range Planning Division

Re: Agricultural Enterprise Ordinance Letter of Support

From: Cuyama Valley Food Action Network

On behalf of Cuyama Valley Food Action Network (CVFAN), we are writing to express our strong support for the Agricultural Enterprise Ordinance that will amend the County Land Use and Development Code (LUDC) and Coastal Zoning Ordinance (Article II) to (1) identify and allow certain compatible small-scale uses that would support and encourage the continuation of farming and ranching on agricultural lands countywide, and (2) revise and/or develop permit requirements to allow these uses, in order to help create new economic opportunities for our rural and remote area of Santa Barbara County, as well as the County at large.

5-1

Increasing the amount of agricultural, supportive, and recreational opportunities on our properties would bring significant benefits and new opportunities to the Cuyama Valley's small and independent producers as they nurture a food system that is environmentally conscious, economically viable, and culturally inclusive, and therefore would support overall economic resilience within our rural community of Santa Barbara County. Please accept this letter of support for The Agricultural Enterprise Ordinance from the Cuyama Valley Food Action Network as we collaborate to build a hyper-local, sustainable agricultural industry that builds a collective identity for Cuyama Valley communities centered on agricultural and economic innovation.

The Cuyama Valley Food Action Network is a critical component to achieving community development opportunities in the Cuyama Valley as it works to improve access to food for all Cuyamans, market Cuyama Valley raw and value-added products to a wider regional audience, and support small and medium size farms with technical assistance and best practices training. It works to develop an equitable, engaging, and resilient food system via collaboration, resource sharing, and educational opportunities available both within the Valley as well as throughout Santa Barbara County, as members of Santa Barbara County Food Action Network. CVFAN catalyzes increased and sustainable small farmer/rancher food production for local consumption through (1) generating market incentives/increased demand, (2) Promoting sound stewardship of the Valley's fragile landscapes with water efficient, climate smart and environmentally friendly technologies and practices, (3) creating sustainable economic prosperity for small farmers, ranchers, and businesses, (4) improving overall food access, and (5) creating a greater sense of community within our rural community.

Sincerely,

Members of the Cuyama Valley Food Action Network

Emily Johnson, Blue Sky Center; Meg Brown and Jean Gaillard, Cuyama Homegrown; Robbie Jaffe and Steve Gleissman, Condor's Hope, Brenton Kelly, Quail Springs; Ferial Sadeghian, Cuyama Buckhorn; Rob Barnett, Blue Sky Center; J & L Haslett

## WE Watch - Ag Enterprise Ordinance Scoping for EIR, 12/7/21

### A.General Comments

It is important that the ordinance honors the need to balance new recreational activities with existing and potential agricultural activities. We agree that it is important that new activities not overwhelm agriculture.

There is the question of cumulative impacts – within each impact and interactions among the impacts. Alternatives need to be creatively addressed so agriculturists can try as many of the activity categories as appropriate to their situation and environmentally feasible. The activity categories within this ordinance (15 major activity categories) are complex as are the three land use processing alternatives.

An important strength of the ordinance is the exempt category for most activities, enabling agriculturists to pilot economic diversification ideas without much investment of funds in land use processing. This is how we can learn what works well and where there are problems before agriculturists make large investments in new recreational activities allowed by the ordinance.

It is important that the EIR evaluate the environmental appropriateness of the exempt category for each activity. And each activity in the ordinance needs EIR evaluation to help determine when a zoning clearance or land use permit is needed and when the environmental issues are so important that a Minor CUP or CUP should be required so the Planning Commission and the public can be involved in evaluation of complicated proposed projects.

The Ordinance generally is being careful to limit scale of new activities so they do not overwhelm existing and potential traditional agricultural activities on AG-II lands. We were not in total agreement with those saying at the meeting that the EIR should determine what figures would be used in the ordinance for number of campsites, number of people and frequency of activities. If it is possible to use the EIR to **help** determine these figures, we are not opposed. But overall, it seems better to us to begin small and expand as it proves feasible when piloting new activities. Scale of activities must be balanced with maintaining neighborhood compatibility and supporting existing agriculture.

### B.Specific questions and comments

**1.Ag-I Farmer Needs.** Ordinance only applies to AG-II lands and in addition wineries on AG-1. In initial WE Watch sponsored discussions about Agricultural Tourism, AG-1 farmers described need for diversification in order to make farming economically feasible. How is their need to engage in activities described in Agricultural Enterprise Ordinance going to be met?

6-1

6-2

**2.Horseback Riding.** Rental horseback riding is the only activity of this kind included in the ordinance. This excludes horseback owners who would like to do trail riding on ranches on their own horses.

6-3

Could activities for horse owners be included in this category?

**3.Trails.** How can we develop EIR so it evaluates use of existing trails and potential trails on County road rights of ways and off road as both recreation and alternative transportation to new activities on ranches/farms and between them?

6-4

**4.Neighborhood compatibility** is a very important part of the environmental evaluation. Concern about this issue drove much of the conflict with winery proposals. Where will neighborhood compatibility be addressed in the EIR?

6-5

**5. # of Total Categories Used.** How many categories can one property utilize before the number of activities begins to overwhelm agriculture?

6-6

**6. Educational Experience, Separation of Agriculturist Events from General Public Events.**

51-80 attendees (ZC/LUP) may be practical for academic and technical training for farmers and ranchers. Some farms or ranches might have so much teaching value that they should be offering such events frequently. Is 51-80 or even larger typical for these kinds of events?

Given the differences in purpose and the variety of potential workshops for the public, wouldn't it be better to separate the farmer and rancher activities from the educational workshops for the general public? One purpose of any outdoor education is to provide an experience in the close to nature environment. Our knowledge of public nature outdoor events, e.g. Adult Education Outdoor courses, Sedgwick Reserve Outdoor Experiences, Road Scholar trips is that they all limit participants to a maximum of 25-30 with 20 being ideal.

6-7

**7.# of events and # of times/year.** The # of times/year is larger for Educational Experience than for any other category on the chart other than horseback riding and fishing. There is no limit on # of days camping allowed but there are only 10 campsites allowed. Might you use the EIR to help decide what the balance needs to be between economic needs/desires of ranchers/farmers for larger # of participants in activities and larger # of events and continued dominance of traditional agriculture and neighbor compatibility.

6-8

**8.Outdoor Lighting.** Some of the AG-II parcels in the SY Valley are outside our SYV Community Plan Update, which has a detailed Outdoor Lighting Ordinance. Activities such as astronomy require dark skies. Other activities benefit from being surrounded by dark skies even though lighting will be needed to provide safety. How can we make sure these parcels are held to lighting standards that will protect the night skies and neighbors from light pollution?

6-9

**9. Campground.** Should # of farmstays available on a given ranch or farm be considered when one analyses how many camping sites should be allowed? What restroom facilities will be required for campgrounds and what type?

6-10

**10. Scoping Development Process** Will scoping go before the Planning Commission before staff moves forward with the EIR? We think the results of this meeting should be absorbed by staff and then presented at the Planning Commission so commissioners can utilize their expertise with EIRs and the public can comment on the final scoping draft.

6-11

**11. Program EIR.** To what extent will this EIR be categorized and used as a Program EIR? Is there any way to prevent an Override exemption other than citizen lobbying of Supervisors? (Not sure terminology is correct in 2<sup>nd</sup> question)

6-12

WE Watch, Nancy Emerson, President

Contact: [fnemerson@comcast.net](mailto:fnemerson@comcast.net)

805-693-1386

# SANTA YNEZ BAND OF CHUMASH INDIANS

P.O. BOX 517 · SANTA YNEZ · CA · 93460

Tel: 805.688.7997 · Fax: 805.686.9578

[www.santaynezechumash.org](http://www.santaynezechumash.org)

## BUSINESS COMMITTEE

KENNETH KAHN, CHAIRMAN  
MIKE LOPEZ, VICE-CHAIRMAN  
MAXINE LITTLEJOHN, SECRETARY-TREASURER  
RAUL ARMENTA, COMMITTEE MEMBER  
GARY PACE, COMMITTEE MEMBER

December 8, 2021

Ms. Julie L. Harris  
Long Range Planning Division  
Planning and Development Department  
123 East Anapamu Street  
Santa Barbara, CA 93101  
Telephone: (805) 568-3543  
Email: [jharris@countyofsb.org](mailto:jharris@countyofsb.org)



RECEIVED

DEC 13 2021

S B COUNTY  
PLANNING & DEVELOPMENT

RE: Notice of Preparation and Scoping of an Environmental Impact Report (EIR)  
PROJECT: Agricultural Enterprise Ordinance  
PROJECT CASE NO.: 20ORD-00000-00013 and 20ORD-00000-00014  
COMMENTS OF THE SANTA YNEZ BAND OF CHUMASH INDIANS (“TRIBE”)

Dear Ms. Harris:

The Santa Ynez Band of Chumash Indians (“Tribe”), as the only federally recognized Chumash Tribe, provides the following comments to the above Project:

1. Request to Initiate AB 52 Consultation; and
2. AG II Lands Owned by the Tribe; and
3. Need for more Camping/RV Spaces.

1. Request to Initiate AB 52 Consultation

The PROJECT Environmental Scoping Document provides as follows:

4.2.5 Cultural & Tribal Cultural Resources The EIR will assess the potential for archaeological and historical resource impacts from the project including cumulative impacts and identify mitigation measures as necessary. The EIR will summarize the County’s Assembly Bill 52 (Public Resources Code Sections 21080.3.1, 21080.3.2, and 21082.3) tribal consultation as needed. (Page 9.)

The Tribe has previously provided Santa Barbara County Planning and Development with notice of the Tribe’s intent to consult as to cultural resources under the California Environmental Quality Act (CEQA).

The Tribe hereby requests AB 52 consultations as to this PROJECT, and the Tribe selects Sam Cohen, Government Affairs and Legal Officer (cell: (805) 245-9083, [scohen@sybmi.org](mailto:scohen@sybmi.org)) for the Tribe’s representative and Nakia Zavalla, Culture Director, as the representative of the Tribal Elders Council.

## 2. AG II Lands Owned by the Tribe

The Tribe owns approximately 356 acres of AG II land located at the intersections of State Highway 154 as its eastern boundary and State Highway 246 as its southern boundary. Some people call this 356 acre parcel the “Triangle Property.”

The Triangle Property has been donated to the Santa Ynez Chamber of Commerce for Outdoor Movies with an inflatable Drive-In Movie Screen and for Artisan Markets (“Recreational Events”).

More recently the Triangle Property was schedule to host the Chumash Pow Wow on October 2-3, 2021 under a music festival permit. The Pow Wow, however, was cancelled out of an abundance of caution over the Delta Variant of COVID-19.

The Tribe did many to host a Native American Heritage Month luncheon and Dance Festival on Saturday November 20, 2021. This was done pursuant to a Land Use Permit, 21LUP-00000-00478 for two of the larger parcels within the Triangle Property, APN 141-230-010/013. (“Cultural Events”).

These Recreational Events and Cultural Events should be included as permissible Educational Events under the Agricultural Enterprise Ordinance.

## 3. Need for more Camping/RV Spaces

While the Tribe appreciates your initiating this PROJECT to “expand a tiered permitting structure, first adopted for the Gaviota Coast Plan area” (“GavPac”), to all lands zoned AG-II, we believe the GavPac model should only be a starting point and not restrict the countywide PROJECT.

For example, while the size threshold for many exempt events are up to 50 persons, the amount of camping/RV stalls are only ten (10). We believe that in the interest of safety the amount of Camping/RV stalls should accommodate the total number of attendees at each event. Therefore we ask that the total number of Camping/RV stalls or places be increased to 50 also.

## Conclusion

This letter shall also be public comment due by December 21, 2021 as to the PROJECT and initiate AB 52 and other government-to-government consultation.. This letter shall also be included in any scoping of any CEQA documents, including without limitation, any Environmental Impact Report (EIR). The Tribe reserves the right to amend or modify these comments at any time prior to final PROJECT approval.

Sincerely,



Kenneth Kahn,  
Tribal Chairman



# SANTA BARBARA COUNTY CATTLEMEN'S ASSOCIATION

P.O. Box 303, Los Alamos, CA 93440

*"WORKING TO SAVE RANCHING"*



December 13, 2021

SENT VIA EMAIL TO [Dlackie@co.santa-barbara.ca.us](mailto:Dlackie@co.santa-barbara.ca.us) and [jharris@co.santa-barbara.ca.us](mailto:jharris@co.santa-barbara.ca.us)  
and [lpowman@countyofsb.org](mailto:lpowman@countyofsb.org)

Mr. David Lackie  
Ms. Julie L. Harris  
Ms. Lisa Plowman  
Planning and Development Department  
County of Santa Barbara  
123 East Anapamu Street  
Santa Barbara, CA 93101

RE: Notice of Preparation (NOP) and Scoping of EIR for Proposed Agricultural Enterprise Ordinance, Case #20ORD-00000-00013 and 20ORD-00000-00014

Dear Mr. Lackie, Ms. Harris and Ms. Plowman:

I send this letter on behalf of the Santa Barbara County Cattlemen's Association and its members to provide comments and suggestions regarding the proposed Notice of Preparation (NOP) and attached Environmental Scoping Document for the Agricultural Enterprise Ordinance.

## **Introduction**

We thank the County for launching this program. Over time, the agricultural community has been subject to increasing costs with little commensurate increase in their profits. This is particularly true for livestock ranchers. Consumers may be paying more at the retail level, but the producers of agricultural products are struggling. It has become increasingly difficult for agricultural families, especially the smaller producers who comprise most of the agricultural landowners and operators, to stay in business.

An ordinance that affords to farmers and ranchers the ability to generate additional revenue from their lands through non-agricultural activities, provided they don't conflict with agricultural operations, would help preserve and even improve agricultural viability in the long term.

In recent years, the public's interest in rural recreational activities has expanded markedly, especially activities that are limited in scale and provide to urban and suburban residents an intimate opportunity to experience the natural beauty of Santa Barbara County's agricultural lands. The success of the County's Wine Trail and associated Winery Ordinance demonstrates the potential for visitors, both local and non-local, to enjoy our rural lands and agricultural operations firsthand to see where their food comes from, and to help them understand the work and challenges associated with agricultural family farms.

## **Environmental Review Is Expensive So Let's Do This Right**

Because the proposed ordinance is so important to farmers and ranchers, who operate on a VERY tight margin, we strongly oppose proceeding with project scoping without first taking the Scoping Document to the County Planning Commission and the Board of Supervisors. This will avoid the substantial expense of having to revise the EIR or, worse, the likelihood that the ordinance doesn't meet either the public's or the agricultural operators' needs and expectations, but no changes are made because lack of funding and staffing. This has happened in the past and we would like to see the County avoid these mistakes by obtaining adequate input from the public and from the Planning Commission and Board.

Please do not proceed with EIR scoping without first receiving input from the Planning Commission and the Board, and from the people who will most benefit from the ultimate result – ranchers, farmers, and the general public.

The proposed public comment period ending December 21, 2021 is inadequate and should be revised, given the need for public input during Planning Commission and Board of Supervisors hearings. It also will give the Agricultural Advisory Committee an adequate opportunity to provide comments.

## **Consider Extending the Ordinance to AG-I-40 Lands**

Many AG-I zoned properties are 40 acres or more and could accommodate all or most of the supportive uses described in the Scoping Document without resulting in significant environmental impacts or annoyance for neighbors. We ask that you include those properties in the ordinance.

## **Consider the Draft Good Neighbor Ordinance**

Many years ago, farmers and ranchers proposed a draft Good Neighbor Ordinance for events on agricultural land. It was just a draft and needed further development, but the concepts that it includes can provide a means to conduct and limit non-agricultural land uses – and tiering of same to match premises size – without impeding agriculture or annoying neighboring landowners. We have attached a copy of that draft ordinance for your review.

## **Coastal Zone Restrictions Should Not Be Extended to Inland Properties**

The Gaviota Planning & Advisory Committee (GavPAC) took great care not to export Coastal Zone restrictions to inland properties. We urge you to do the same. Land use restrictions that are either mandated by or consistent with the Coastal Act are unique and should be confined to the Coastal Zone. They should not be allowed to "creep" out into inland rural lands.

## Suggestions for Inclusion in the Agricultural Enterprise Ordinance

Please pardon any replication included in this letter. We only recently received the Scoping Document. We would like to have the opportunity to provide additional input during an extended public comment period, but submit this letter to provide our input in the event that the County does not extend the public comment period.

The following are our initial responses to **Table 1 – Summary of Proposed Ordinance Amendments – attached to the Scoping Document:**

**Campground** – The Description allows for campgrounds and RV accommodations “unless prohibited within the applicable zone.” Campgrounds and RV accommodations aren’t included in the current LUDC list of allowed uses in AG-II, but that doesn’t mean the ordinance can’t be modified to make these allowed uses in both AG-I and AG-II – without requiring extensive permitting such as that required for a Conditional Use Permit (CUP). The AG-II zone allows for limited “rural recreation” but only with a CUP and few farmers and ranchers have the resources to spend the many thousands of dollars required to win a CUP. Campground and RV accommodations provide an excellent example of why tiering should be used, following the lead of the Good Neighbor Ordinance by allowing for more and/or larger campsites as the size of the premises (not individual parcels within a land holding) increases. For example, ten campsites might be too many on 40 acres and too few on a 1,000-acre ranch. In addition, the proposed limit on RV length and on the property owner’s right to provide more than one semi-permanent accommodation per campsite make no sense as broadly applied. In fact, we would appreciate an explanation for limiting the RV or trailer size. Many horse trailers are longer than the proposed maximum length. We should be encouraging landowners to provide RVs, yurts, trailers, or other non-permanent abodes, because these temporary installations would result in fewer vehicles rolling in and out of the property so we would expect the County to encourage their use. Why the limitation of 50% of the campsites having RV and semi-permanent facilities? What is the problem with larger RVs? We also propose that permanent sanitary facilities and showers be allowed at a campground. Finally, we propose that only a ZC/CDP be required for the small-scale campgrounds and an LUP for larger campgrounds for the reason stated above – the cost of a CUP. One of the reasons why few farmers and ranchers took advantage of the County’s now-defunct agricultural accessory dwelling ordinance was the expense of processing a CUP and the risk that it might be denied after the applicant has spent thousands of dollars. If the County requires a CUP for these enterprises, they are almost certain not to be pursued by a farmer or rancher. Well-funded entrepreneurs might be able to absorb the cost and risk, but not most farmers and ranchers.

8-5

**Educational Experience/Opportunity** – We suggest that guided farm tours include ATV tours. Much of the County’s grazing lands are used for grazing because their slopes render the growing of crops difficult. Most grazing operations cover hundreds or thousands of acres and the livestock are spread across that acreage. What is the likelihood that urban visitors could pay to walk, bike, or Ebike through acres of property, up and down dirt roads? We propose that ATV farm/ranch tours be included as an exempt use, as their light weight and wide tires have a much softer touch to the landscape, and these ranch tours would accommodate individuals of all ages. Entire families could participate together. We also propose that tours of 10 people or less be allowed daily without the need for an LUP or ZC. All of these tours should be guided so people don’t get lost, accidentally roam onto neighboring property, or find themselves in the bull pasture. This activity also should allow for sanitary facilities without requiring a ZC or LUP.

8-6

**Fishing Operation** – We propose that Hunting Operations be included as well (excluding exotic animals). Current state Fish and Wildlife laws regulate hunting to properly manage the various species in a sustainable manner in harmony with their habitat and environment. Operations like wild pig hunting would greatly help to improve the habitat and environment and reduce the impact that wild pigs have on our hay fields and other crops. Wild pigs are amazingly prolific and can cause significant damage to crops. We again question why new sanitary facilities require a ZC or LUP. The proposed Exempt category allows 20 visitors a day, but doesn't allow toilet facilities? That is short-sighted and likely would be of concern to Environmental Health Services.

8-7

**Horseback Riding** – This should include allowing people to bring their own horses to the farm or ranch for riding. It makes no sense to exclude horse owners who would love to ride their horses on open land (public trails for equestrian – not mixed– use are almost impossible to find in the County) and will pay a fee to do so. And we once again raise the issue of banning sanitary facilities unless you have a ZC or LUP.

8-8

**Composting** – While the Gaviota Ordinance limits composting, on larger AG-II inland properties the ordinance should provide greater flexibility regarding the amount of compost produced. This is an example of a use for which tiering would be particularly appropriate.

8-9

**Farm Stand --** We propose that larger Farm Stands should be allowed on larger properties with a ZC or LUP. Tiering would be very effective for this use.

8-10

**Firewood Processing and Sale** – We propose that this include “Harvesting” and that the Exempt category allow materials to come from the premises or within 5 miles of same to allow for more consolidation of this operation rather than having each rancher in the area undertaking it. These types of operations help to reduce and remove heavy fuel levels that cause catastrophic wildfires.

8-11

**Tree Nut Hulling** – Include “Shelling” and allow in the Exempt category all of the uses shown in the Table as requiring a ZC, LUP or LCP. This kind of operation would allow other growers to bring their raw product to a single place for processing rather than requiring each farmer to run their own facility. We add “shelling” because nuts have a hull and a shell and being allowed to shell onsite saves the farmer (and the farmer's neighbors) a great deal of the cost of producing the end product – an edible nut that doesn't have to be cracked.

8-12

**Aquaculture** – Rather than imposing permitting for these operations, we propose a tiering based on size of property and size of operation, pursuing the lead of the GavPAC that would have allowed for smaller “experimental” uses (without permits) to determine their potential, followed by expansion that might require permitting.

8-13

**Drying, freezing, pre-cooling & packaging** – The permitting level should be based on facility size. Often one such facility can serve the farmer and neighboring farmers, thereby yielding the farmers more profit. Permitting costs can render these small facilities economically unfeasible.

8-14

**Slaughter Facility** – This was not included in the list, but it should be, provided that it is tiered based upon property size. We have recently learned that the closest poultry slaughter facility is in Los Angeles County, causing many small farmers who sell their poultry at Farmers Markets and to small independent grocers to either go out of business or incur the additional expense of driving to Los Angeles. The result, of course, is that many of these small farmers have stopped

8-15

selling fresh, organic poultry in the Tri-Counties. At one time, mobile units served the slaughter needs of local cattle ranchers as well. Slaughter operations, sized based upon premises size, would open up a new possibility of locally-grown cattle being processed and sold locally without incurring enormous permitting expenses. By allowing stationary and mobile slaughter units, the County will do a service to the agricultural community and the general public.

8-15  
cont'd.

**Watershed Improvements** – These are not on the list but also should be tiered in a manner that encourages them and conforms the project to the property size.

8-16

**Equestrian Facilities** – Because of CUP requirements, these facilities are gradually vanishing because they have been around for years and have no permits. Once discovered, they close down because they are too small to afford the cost of a CUP.

8-17

**Branding Open to the Public** – Although branding generally occurs once a year, it is an interesting and exciting way to learn more about cattle operations and enjoy an impromptu BBQ with ranchers. It isn't mentioned as a permitted use not requiring a permit but would be a wonderful learning opportunity and would have no impacts if isn't conducted on any premises more than 4 times a year.

8-18

**Filming** – Agricultural lands are uniquely suited for commercial filming without having any adverse impact upon the public or neighbors. We propose that the County reduce or eliminate permitting requirements for many filming activities – again using the tiering approach to base the permit level upon the property size, thereby allowing a wide range of filming projects on larger lands with less permitting and either reducing the size or requiring permitting on smaller properties where the potential for adverse impacts on neighbors, public roads, and the environment is higher.

8-19

**Temporary Events** – We ask that the County revisit the permitting process for temporary events, many of which require a CUP which, as noted above, isn't an option for most agricultural landowners. The tiering concepts in the Good Neighbor Ordinance could be used to require a CUP for larger and/or more frequent events while reducing the permitting for more modest or infrequent events. The larger premises should be allowed to have more frequent and larger events if they adopt the impact avoidance described in the Good Neighbor Ordinance.

8-20

**Carbon Capture** – This is an emerging and growing revenue source that allows for agricultural land improvement while also sequestering carbon and should be allowed without requiring a permit.

8-21

**Conclusion**

Table 1 of the Scoping Document is a good start, but it requires more input from the public and from the agricultural community.

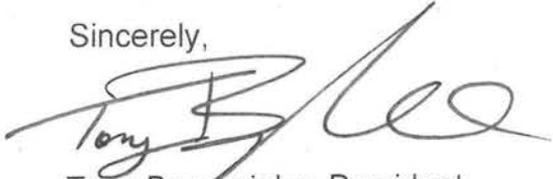
One major factor is missing – a definition of what test will be used to determine when a non-agricultural use is and is not the “primary use” of the land. If the test is based upon the revenue yielded by the use, very few operations will pass the test because most of the land uses listed will yield more profit than raising and selling cattle, yet cattle remain an important part of this County's agricultural scene and we are trying to retain cattle grazing well into the future. We propose that any of these uses be deemed secondary to the agricultural operations if they meet the use limitations set forth in the ultimate Table 1.

8-22

We look forward to working collaboratively with you on this ordinance so that it helps preserve agricultural viability, encourages education of the general public regarding their food sources, and protects our beautiful rural lands.

Thank you for your consideration. We look forward to working with you on this extremely important ordinance.

Sincerely,

A handwritten signature in black ink, appearing to read "Tony Branquinho". The signature is stylized and cursive, with a large, sweeping initial "T" and "B".

Tony Branquinho, President

**DRAFT PROPOSED PROVISIONS OF  
SPECIAL EVENTS (TEMPORARY USES) ORDINANCE  
APPLICABLE IN SANTA BARBARA COUNTY**

The following ordinance is proposed to regulate all temporary special events throughout the County of Santa Barbara. The proposed ordinance is to regulate and prevent impacts from these special events. This ordinance language is proposed to replace Land Use Development Code §§ 35-137.3.1.d.2 and 3; 35-137.3.2.b; 35-137.3.3.a and b; and 35.42.260.4 and 9 and Montecito Land Use and Development Code §§ 35.442.180.F.3 and 35.442.180.F.6.

**Sec. 35-\_\_\_ Temporary Uses – Special Events**

**Sec. 35-\_\_\_ Purpose and Intent.** The purpose and intent of this ordinance is to create regulations applicable to all lands in the County that address potential impacts of special events such as noise, light, dust, traffic, and parking. The purpose and intent of this ordinance also is to provide for event uses that are incidental to the primary use of the land. All event activities described below shall be incidental to the primary use of the land and shall not displace or impede the primary use. All applicable fire, health, and safety ordinances and regulations shall apply.

**Sec. 35-\_\_\_ Applicability.**

The provisions of this section shall apply to all special events held in the County. Such uses shall be subject to all the provisions set forth herein, as applicable.

**Sec. 35-\_\_\_ Definition of Special Event.** “Special event” is the temporary use of property for functions, including but not limited to fundraisers, parties, receptions, weddings and other similar celebrations with more than 75 guests in attendance at any one time during a 24-hour period. Any event conducted where 75 or fewer total guests are in attendance at any one time during a 24-hour period is a gathering, not a special event, and shall be exempt from regulation and no development standards or other requirements shall be imposed under this ordinance.

**Sec. 35-\_\_\_ Processing.**

No special events subject to the provisions of this Section shall occur except in conformance to the following requirements. No permits for special events subject to the provisions of this Section shall be approved or issued except in conformance to the following requirements.

**Sec. 35-\_\_\_ General Requirements Applicable to All Special Events**

For any of the following events, the landowner or occupant hosting or allowing the event to occur shall ensure that all of the following General Requirements Applicable to All Special Events (General Requirements) are met throughout the event:

1. No later than seven (7) days prior to the commencement of the event, the landowner or event sponsor shall provide written notice to all neighboring property owners, using the most current owner’s name and address on the Assessor’s tax records. Such notices shall advise the recipients of the date and time of the event commencing and ending and an operating telephone number that neighboring property owners can use to reach the event sponsor during and at least one week following the event to advise of any problems or complaints associated with the event. The notice shall also include the phone number for the Sheriff in case a noise complaint during the event is not addressed by a call to the event sponsor.
  - (a) A “neighboring property owner” for properties outside the urban limit line is defined as (i) properties located within a one-half mile radius of the portion(s) of the parcel upon which special event activities will occur, including both the site upon which

people will be gathering and all parking areas, sanitary facilities, catering set-up areas, and other areas directly related to the event ("event site") and (ii) all property owners whose lands abut a public road serving, and located within one mile of, any entrance road used to access the event site by guests or staff.

- (b) A "neighboring property owner" for properties inside the urban limit line is defined as all owners of property located within a 300-foot radius of the exterior boundaries of the premises hosting the special event.
2. Noise levels generated by the special event shall not exceed levels of 65 decibels (Leq) from 8:00 a.m. to 10:00 p.m. and 60 decibels (Leq) from 10:00 p.m. to 8:00 a.m. at any property line that lies at the exterior boundaries of the event premises.
  3. No dust generated by event activities shall be allowed to travel beyond the exterior boundary of the event premises.
  4. Within the urban limit line or on properties smaller than 20 acres, no event set up or clean up shall occur on Sunday earlier than 10:00 a.m. or Saturdays before 8:00 a.m.
  5. All parking shall be provided onsite except that parking may be provided off-site in any of the following locations.
    - (a) A public lot owned or operated by a public agency.
    - (b) A public lot operated on a privately owned commercially zoned property, provided that the property owner or lessee of the property has consented to the use of property for the event parking.
    - (c) A lot on a church, educational, or other similar institution's property, provided that the property owner or lessee of the property has consented to the use of the property for the event parking.
    - (d) Privately owned property, provided that the owner or lessee of the property has consented to the use of the property for the event parking and the parking activity meets all of the following standards:
      - (i) No dust generated by parking shall travel beyond the exterior boundary of the property used for parking.
      - (ii) No vehicles are parked closer than 50 feet of a residence owned by a party other than the owner or lessee of the property upon which parking is occurring.
  6. A traffic monitor shall be on duty throughout all periods during the event that guests are arriving and departing in personal vehicles to prevent congestion and stacking of vehicles on public roads or private access roads shared with property owners other than the owner of the event site. No traffic monitor shall be required if all guests, other than those displaying handicapped stickers or placards on or in their vehicles, arrive and depart via shuttle. For special events with more than 1,000 people, the traffic monitor shall be a retired, off-duty, or on-duty Sheriff's Deputy, City Police officer, or California Highway Patrol officer.

7. Lighting shall meet all of the following specifications:

- (a) The general purpose of this specification is to protect and promote public health, safety and welfare, the quality of life, and the ability to view the night sky and control light shining from a parcel onto neighboring parcels and onto public rights-of-way. These specifications establish standards for special event lighting in order to accomplish the following:
  - (i) To protect against direct light glare and excessive lighting; and,
  - (ii) To provide safe lighting levels at events; and,
  - (iii) To protect the ability to view the night sky; and,
  - (iv) To minimize light trespass to neighboring parcels, public right of ways, and areas of the affected parcel not used for the special event.
- (b) Purpose and Intent:
  - (i) To protect against direct light glare and excessive lighting; and,
  - (ii) To provide safe lighting levels at events; and,
  - (iii) To protect the ability to view the night sky; and,
  - (iv) To minimize light trespass to neighboring parcels, public right of ways, and areas of the affected parcel not used for the special event.
- (c) General Lighting Requirements:
  - (i) All exterior lighting shall be full cutoff fixtures with light source fully shielded.
  - (ii) Maximum height of any lamp in any fixture shall not exceed 25 feet measured from the average ground elevation where the event is to be held.
  - (iii) No glare shall be visible when viewed from adjoining parcels and public right of ways.
  - (iv) Light trespass on adjacent parcels or public right of ways shall be one candle foot or less measured at ground level at the limit line of adjacent parcels or public right of ways.
  - (v) Average illumination shall not exceed 30 feet candle unless a higher amount is required for health, safety and welfare, subject to the following exceptions:
    - (1) Luminaries that have a maximum output of 260 lumens (approximately 20 watts incandescent) per fixture may be unshielded provided the fixture has an opaque top to prevent up lighting. Light may not trespass onto properties owned by third parties.
    - (2) Luminaries that have a maximum output of 1000 lumens (approximately 60 watt incandescent) may be partially shielded, provided the lamp is not visible and the fixture has an opaque top to prevent up lighting. Light may not trespass onto properties owned by third parties.
    - (3) Flood Lights with external shielding may be angled, provided that no light escapes above a 25 degree angle measured from the vertical line from the center of the fixture extended to the ground. Light may not trespass onto properties owned by third parties. Flood lights with directional shielding should be encouraged.
    - (4) Holiday lights are exempt, as long as they are not flashing or otherwise sequenced.
    - (5) Any lighting within a temporary structure, such as a tent or canopy, are exempt, provided that the structure fully shields all lamps.
    - (6) Hand held battery operated luminaries (i.e. flashlights) are exempt.

- (7) Vehicular lights and all temporary emergency lighting needed by fire and police departments, or other emergency service, shall be exempt.
- (d) Exceptions to General Lighting Requirements: An exception or relaxation of the terms of the General Lighting Requirements shall be made by the Director under a permit for an SEUP if without the exception or relaxation, because of conditions peculiar to the property and not the result of the actions of the owner or operator of the premises, strict application of this article would result in unnecessary and undue hardship or compromise the health, safety and welfare of the attendees of the event.

**Sec. 35-\_\_ Exemption for touring.** This ordinance does not apply to touring activities on agricultural and mountainous lands such as individual or group bicycling, horseback riding, walking, jogging, running, touring, or hiking activities, which shall be exempt from regulation as a temporary event or special event regardless of the number of participants except that touring shall be subject to the noise regulation stated above.

**Sec. 35-\_\_ Special Events on Lands Outside the Urban Limit line**

1. Special events must be incidental to the primary zoning use on the property. To ensure that special events on lands zoned for agricultural use are incidental to the primary use, which shall be agricultural production, and any secondary residential use of the land, an active agricultural operation must exist on any agricultural property used for special events and special events activities shall not displace or impede agricultural activities on the land.
2. The Property owner must comply with all applicable General Requirements during all set-up, clean up, and break down of event amenities and throughout the event. Furthermore, depending on the size of the premises and the number of guests, the following Additional Operating Standards are required.
  - (a) Premises<sup>1</sup> that Comprise 500 or More Total Acres
    - (i) For events with 76-150 total guests in attendance at any one time, no event activity shall be conducted closer than 50 feet from an exterior property line of the premises or public road, except that parking during daylight hours may occur closer than 50 feet from a public road.
    - (ii) For events with more than 151 total guests in attendance, no event activity shall be conducted closer than 500 feet from an exterior property line of the premises or public road, except that parking during daylight hours may occur closer than 500 feet from a public road.
  - (b) Premises that Comprise 100 to Less than 500 Total Acres
    - (i) For events with 76-150 total guests in attendance at any one time, no event activity shall be conducted closer than 50 feet from an exterior property line

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<sup>1</sup> For the purposes of this ordinance, the term "premises" shall refer to the parcel or parcels upon which event activities (including people gathering, parking areas, sanitary facilities, catering set-up areas, and other areas directly related to the event, but not public roads or access roads shared with other property owners) are conducted, and all other abutting or adjacent parcels owned, leased or otherwise controlled by the owner or operator of the parcel or parcels upon which the event activities are conducted.

of the premises or public road, except that parking during daylight hours may occur closer than 50 feet from a public road.

- (ii) For events with 151 to 1000 total guests in attendance at any one time, no event activity shall be conducted closer than 500 feet from an exterior property line of the premises or public road, except that parking during daylight hours may occur closer than 500 feet from a public road.
  - (iii) For events with more than 1,000 guests, see the permit requirements set forth in Section \_\_\_ below.
- (c) Premises that Comprise 40 to Less than 100 Total Acres
- (i) For events with 76-150 total guests in attendance at any one time, no event activity shall be conducted closer than 50 feet from an exterior property line of the premises or public road, except that parking during daylight hours may occur closer than 50 feet from a public road.
  - (ii) For events with more than 151-500 total guests in attendance at any one time, no event activity shall be conducted closer than 300 feet from an exterior property line of the premises or public road, except that parking during daylight hours only may occur closer than 300 feet from a public road.
  - (iii) For events with more than 500 guests, see the permit requirements set forth in Section \_\_\_ below.
- (d) Premises that Comprise 5 to Less than 40 Total Acres
- (i) For events with 76-150 total guests in attendance at any one time, no event activity shall be conducted closer than 50 feet from an exterior property line of the premises or public road, except that parking during daylight hours may occur closer than 50 feet from a public road.
  - (ii) For events with more than 151-300 total guests in attendance at any one time, no event activity shall be conducted closer than 300 feet from an exterior property line of the premises or public road, except that parking during daylight hours only may occur closer than 300 feet from a public road.
  - (iii) For events with more than 300 guests, see the permit requirements set forth in Section \_\_\_ below.
- (e) Premises that Comprise Less than 5 Total Acres
- (i) Refer to regulations applicable to properties within the urban limit line of the corresponding size.

**Sec. 35-\_\_\_ *Special Events on Lands Inside the Urban Limit line***

1. Special events must be incidental to the primary zoning use on the property. Given the relatively small size of property within the urban limit line, to ensure that special events are incidental to the primary use, a property owner shall not have more than 12 special events in a year and each event must be at least 30 days apart. In Montecito, a property owner shall not have more than 3 special events in a year.

2. The Property owner must comply with all applicable General Requirements throughout the event and during all set-up, clean up, and break down of event amenities. Furthermore, depending on the size of the premises and the number of guests, the following Additional Operating Standards are required.

(a) Premises that Comprise 5 or More Total Acres

- (i) For events with 76-150 total guests in attendance at any one time, no event activity shall be conducted closer than 25 feet from an exterior property line of the premises or public road, except that parking during daylight hours only may occur closer than 25 feet from a public road.
- (ii) For events with 151 – 300 total guests in attendance at any one time, no event activity shall be conducted closer than 20 feet from an exterior property line of the premises or public road, except that parking during daylight hours may occur closer than 20 feet from a public road.
- (iii) For events with more guests, see the permit requirements set forth in Section \_\_\_ below.

(b) Premises that Comprise 1/2 an Acre to Less than 5 Total Acres

- (i) For events with 76-150 total guests in attendance at any one time, no event activity shall be conducted closer than 15 feet from an exterior property line of the premises or public road, except that parking during daylight hours only may occur closer than 15 feet from a public road.
- (ii) For events with more guests, see the permit requirements set forth in Section \_\_\_ below.

(c) Premises that Comprise Less than 1/2 Total Acres

- (i) For special events with more than 76 total guests, see the permit requirements set forth in Section \_\_\_ below.

**Sec. 35-\_\_\_ Special Events Use Permit**

1. A property owner must apply to the Director of Planning & Development for a Special Events Use Permit (SEUP) if the owner cannot comply with the requirements of this section or if the special event will have more than a certain number of guests.

<b>SEUP Required</b>	
<b>Type of Property</b>	<b>Number of Guests</b>
<i>Lands Outside the Urban Limit line</i>	
500 or More Acres	No limit
100 to Less than 500 Acres	Over 1,000
40 to Less than 100 Acres	Over 500
5 to Less than 40 Acres	Over 300
Less than 5 Acres	See limits below
<i>Lands Inside the Urban Limit line</i>	

Over 5 Acres	Over 300
0.5 to 5 Acres	Over 150
Less than 0.5 Acres	Over 75

2. The Director's decisions on any SEUP application shall not be appealable by any party, including the applicant. This includes decisions regarding conditions of approval.
3. Properties That Receive Complaints Regarding Special Events
  - (a) The Planning and Development Department shall keep public records of complaints about special events. If complaints supported by evidence of a violation of public nuisance laws or the requirements of this section are received by the County within any 12 month period regarding two events on a single premises, the property owner must apply for a SEUP for all future special events for the next 12 months.
4. If the Director denies issuance of a SEUP or the applicant disagrees with the SEUP's conditions of approval, the applicant shall be entitled to apply for a Minor Conditional Use Permit for the proposed event(s).

**Sec. 35-\_\_\_ Special Events Lighting Definitions**

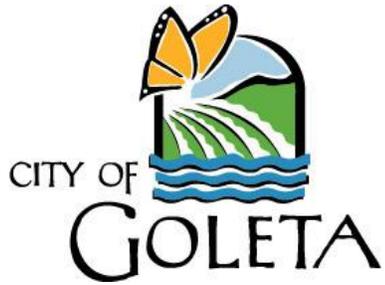
1. Unless otherwise defined in the section, the following definitions for Lighting Specifications are applicable to this section:

Unless specifically defined below, words and phrases used in this specification shall be interpreted as to give them the meaning they have in common usage and to give this specification its most reasonable application.

- (a) Area Light: Light that produces over 1800 lumens.
- (b) Average Foot-candle: The level of light measured at an average point of illumination between the brightest and darkest areas measured at ground surface.
- (c) Candela: Unit of luminous intensity.
- (d) Eighty-Five Degree Full Cutoff Type Fixtures: Fixtures that do not allow light to escape above an 85 degree angle measured from a vertical line from center of the lamp extended to the ground.
- (e) Exterior Lighting: Fixture that is installed, located or used in such a manner to cause light rays to shine outside.
- (f) Fixture: The assembly that holds the lamp and its various components in a lighting system.
- (g) Foot Candle: Illumination produced on a surface one foot from a uniform point source of one candela.
- (h) Full Cutoff Fixture: Fixture as installed that are designed or shielded in such a manner that all light rays emitted by the fixture, either directly from the lamps or indirectly from the fixture, are projected below a horizontal plane running through the lowest point on the fixture where light is emitted.

- (i) Glare: Intense light that results in discomfort and/or a reduction of visual performance and visibility. In this specification, glare is the ability to see the lamps directly or through reflection.
- (j) Holiday Lighting: Festoon type lights limited to small individual lamps and/or fixtures on a string or lamp cord where the spacing of lamps are three inches or greater and where the output per lamp is no greater than 15 lumens.
- (k) Lamp: The source of light, commonly referred to as a light bulb.
- (l) Light Pollution: Any adverse effect of manmade light, including but not limited to, light trespass, up-lighting, the uncomfortable distraction of the eyes, or any manmade light that diminishes the ability to view the night sky.
- (m) Light Trespass: Light falling where it is not needed or wanted.
- (n) Lumen: A unit of luminous flux; the flux emitted within a unit solid angle by a point source with a uniform luminous intensity of one candela. One foot candle is one lumen per square foot.
- (o) Luminaire: A light fixture – see Fixture definition.
- (p) Partially Shielded: The lamp of the fixture is shielded by translucent siding and the lamp is not visible directly or indirectly, but may be viewed as a glow.
- (q) Shielded: When the light emitted from the lamp in a fixture is projected below a horizontal plane running through the lowest point of the fixture where light is emitted. The lamp is not visible and no light is emitted from the sides of the fixture. Also considered a "Full Cutoff Fixture."
- (r) Temporary Lighting: Lighting that is intended to be used for a special event for seven days or less.
- (s) Up Lighting: Lighting that is directed in such a manner as to shine light rays above the horizontal plane
- (t) Wattage: Wattage is a measure of energy use and has no bearing on light output.

4633386.2



December 17, 2021

SENT VIA EMAIL

**CITY COUNCIL**

Paula Perotte  
*Mayor*

James Kyriaco  
*Mayor Pro Tempore*

Roger S. Aceves  
*Councilmember*

Stuart Kasdin  
*Councilmember*

Kyle Richards  
*Councilmember*

**CITY MANAGER**  
Michelle Greene

Julie Harris  
Project Manager  
County of Santa Barbara Planning and Development Department  
123 E. Anapamu Street  
Santa Barbara, CA 93101

**RE: Agricultural Enterprise Ordinance: Notice of Preparation and Scoping Document – City of Goleta Comments**

Dear Ms. Harris:

Thank you for the opportunity to provide comments on the Notice of Preparation (NOP) and Scoping Document for the County of Santa Barbara (County) Agricultural Enterprise Ordinance (AEO).

The City of Goleta (City) regularly engages with County Department of Planning and Development staff to cooperatively resolve issues of concern associated with projects located within the County's jurisdiction, but which could result in negative effects and impacts to the City. After reviewing the NOP and Scoping Document for the project, which were released on November 22, 2021, City staff has identified several concerns and potential deficiencies within a number of the areas of review proposed and summarized with the documents.

In general, the City supports activities on agricultural land, such as farm weddings, wineries, and other visitor-serving uses that support local tourism and make farms more economically viable. Making farms within the unincorporated area more viable helps ensure that agricultural lands remain in cultivation with orchards and compatible crops and preserve an attractive greenbelt around Goleta.

However, the City also would like to ensure that potential, negative impacts related to the AEO project are fully analyzed and either

eliminated or mitigated to levels that are less than significant. Based on our review of the NOP and Scoping Document, the City wishes to provide the following comments in an effort to help guide a more thorough and comprehensive review within the subsequent Environmental Impact Report (EIR) for the AEO project:

## **NOTICE OF PREPARATION:**

### **Project Description**

The full description of the AEO project only addresses its applicability to lands zoned AG-II. However, later in the Scoping Document, the project describes additional provisions that would apply to winery tasting rooms on lands zoned AG-I. This omission should be corrected and the County should consider whether re-noticing and recirculating the AEO Scoping Document is warranted or required, pursuant to the California Environmental Quality Act (CEQA).

9-1

## **SCOPING DOCUMENT:**

### **Global Comments**

Throughout the document, we suggest changing the term “structure” to “framework” when discussing the tiered permitting and thus reserve use the term “structure” to actual physical development in order to eliminate potential confusion.

9-2

The project should make a distinction for agriculturally zoned lands that are located on the urban-rural interface around incorporated areas. These lands will have significantly different types of negative impacts than the same zoned lands located further from urban centers. As such, a buffer of one mile should be considered for any AEO-related allowance for any proposed development. Within this buffer, no “low-level” [ministerial] permits should apply to more intensive uses contemplated by the ordinance, but only discretionary Conditional Use Permits, which would require a subsequent CEQA review to better evaluate the site-specific impacts.

9-3

In no instances should new and expanded AEO-related development be allowable on properties with illegal operations or ongoing zoning violations. Prior to any exemptions, issuance of Zoning Clearances, or approvals of a Land Use Permit or Coastal Development Permit, the County must ensure that the subject lot complies with all applicable Zoning Code regulations and policies for existing structures and land uses.

9-4

The document appears to be using CEQA Guidelines from an outdated source. The 2021 CEQA Guidelines Appendix G Environmental Checklist includes additional areas of environmental review that are not included in the Scoping Document. Specifically, the document omits the requisite analysis in the areas of Energy, Mineral Resources, and Population/Housing.

9-5

### **Section 3.3 – Project Overview**

Rename this section to “Project Objectives” so readers can more easily find the specific objectives, which are later referenced in the document in the Alternatives Analysis.

For consistency and to avoid confusion, please eliminate the examples given for small-scale uses in the second objective. Otherwise, they could be misread as being the only instances to which the otherwise broad objective would apply.

9-6

### **Subsection 4.2.1 – Aesthetic and Visual Resources**

This section must evaluate the impacts of new AEO-related uses for their impact on dark skies, as viewed from all public areas, including parks, trails, and roadways.

This section should discuss allowances and visual/aesthetic impacts for increased signage for the new AEO-related uses. Additionally, if such new uses are on lands within the urban-rural interface discussed earlier in this letter, off-site signage would likely be prohibited.

9-7

All new structural development within the urban-rural interface should require design review by the appropriate County Board of Architectural Review to ensure compatibility with the adjacent incorporated jurisdiction.

### **Subsection 4.2.3 – Air Quality and Greenhouse Gas Emission**

The subsequent EIR should provide detailed analysis around air quality as it relates to the potential release of hydrogen sulfide (H<sub>2</sub>S) gases, which are known to occur in the areas north and west of the City.

The EIR should also evaluate the annual Santa Ana winds and the effects they have on air quality (i.e., transport of dust and H<sub>2</sub>S) as they would relate to new and expanded agricultural enterprise activities.

9-8

### **Subsection 4.2.4 – Biological Resources**

The Scoping Document states that the EIR will “identify feasible mitigation measures necessary to reduce or avoid significant impacts” to biological resources. Mitigation measures can be incorporated into adopted regulation as development standards that would require a project to avoid any and all potential impacts or they are incorporated into a project as conditions of approval. However, CEQA does not allow a project to simply be conditioned into compliance with the law. Any final action to adopt an AEO that includes either an exemption, an unappealable Zoning Clearance, or other “low-level” ministerial permits (i.e., LUP, CDP) must only have these permit options available for development that would completely avoid any and all potential impacts, including cumulative impacts, on protected biological resources.

9-9

### **Subsection 4.2.5 – Cultural & Tribal Cultural Resources**

The Scoping Document has combined these two separate CEQA issue areas into a single section and then seems to describe it as being merely an AB 52 issue. Furthermore, even though this section covers two separate but related issues, the section has the least amount of context (just two sentences) briefly explaining what and where these types of resources are and what types of AEO-related activities (e.g., grading, conversion of historic buildings, camping, etc.) could have adverse, negative impacts on them. The County should ensure that the CEQA document has a robust investigation and discussion on the cultural, tribal cultural, and paleontological resources that could be affected by these new activities that go well beyond typical agricultural cultivation on rural AG-II lands.

9-10

### **Subsection 4.2.7 – Hazards and Hazardous Materials**

The subsequent EIR must provide detailed analysis around hazards and hazardous materials as relating to the potential release of hydrogen sulfide (H<sub>2</sub>S) gases, which are known to occur in the areas north and west of the City.

9-11

### **Subsection 4.2.8 – Hydrology & Water Quality**

The subsequent EIR must also provide detailed analysis around hydrology and water quality it relates to the potential release of hydrogen sulfide (H<sub>2</sub>S) gases, which are known to coincide with water extraction in the areas north and west of the City.

The EIR must fully analyze and discuss the impacts to each of the water basins within the County. Of particular concern for the City are those water basins where Goleta Water District has infrastructure and interests. These basins are fundamental for the City and any additional non-District extraction will result in less water availability throughout their service area.

The EIR should also analyze and discuss the impacts that continued, expanded, or intensified groundwater withdrawal could have on saltwater intrusion, land subsidence, flood inundation, and sea-level rise.

9-12

A robust discussion must be included in the EIR that analyzes water usage associated with each potential AEO-related use. Any final action to adopt an AEO that includes either an exemption, an unappealable Zoning Clearance, or other “low-level” ministerial permits (i.e., LUP, CDP) must only have these permit options available for development that would not increase existing water use and completely avoid any and all potential impacts, including cumulative impacts, on protected water resources.

The County should also be certain that existing, permitted, agricultural water wells are not repurposed for potable use without the requisite review and permits. Similarly, any

expanded AEO-related use that requires onsite wastewater management must also be analyzed on a case-by-case basis to ensure safe and controlled treatment or disposal.

9-12  
cont'd.

### **Subsection 4.2.9 – Land Use and Planning**

The EIR analysis needs to include review of the Transportation Element of the City's General Plan to determine whether the potential changes and increases in vehicular movements within the City are consistent with City policies, such as Level of Service standards (LOS).

The EIR analysis needs to include review of the City's General Plan Visual and Historic Resources to determine whether the potential AEO-related uses would be consistent with City policies.

9-13

One of the stated goals of the AEO is to streamline permitting for various agricultural-related uses. A matrix should be developed that discloses the existing and proposed permit paths for each of the uses covered in the AEO. This matrix would be an important component in the required alternatives analysis to provide the substantial evidence needed in the "No Project" alternative.

### **Subsection 4.2.10 – Noise**

The Scoping Document acknowledges that the new AEO-related uses have the potential to introduce new noise-generating uses that are not typical for agricultural areas. It was unclear from the document what particular "sensitive receptors" would be analyzed. It will be important for the EIR to not only analyze the effects of these new noise-generating uses on nearby biological habitats, but also to residential uses that would be able to hear the newly introduced noise generated by these new, non-typical uses.

Any final action to adopt an AEO that includes either an exemption, an unappealable Zoning Clearance, or other "low-level" ministerial permits (i.e., LUP, CDP) must only have these permit options available for development that would not have any type of outdoor amplified sound system.

9-14

If new AEO-related activities would occur after dusk, the quiet night-time ambient levels should be analyzed. Also note that the typical southerly wind direction in the evening will further affect the distance noise would travel at night.

### **Subsection 4.2.11 – Public Services, Utilities, and Recreation**

As previously discussed, any new or expanded water usage within water basins used by public water districts should be analyzed to determine the potential impact to water availability to existing and future service customers of those districts.

9-15

As noted within the Scoping Document, an incremental increase in the use of local roadways would increase the need for more frequent road maintenance. The EIR should analyze and disclose the impacts and costs that would be incurred by incorporated areas and identify adequate mitigations.

9-15  
cont'd

The EIR should discuss how increased AEO-related uses could introduce new or expanded recreational uses that conflict with existing recreational use, such as potential increases in equestrian use of hiking and biking trails (or vice versa) and whether new or expanded trails or bike paths would be needed to ensure safety.

The EIR needs to also explain how mitigation measures would be applied to, monitored, and enforced upon AEO-related uses that would be classified as “exempt” from permits.

#### **Subsection 4.2.12 – Transportation**

When analyzing Vehicle Miles Traveled (VMT), the EIR should be clear on the methodology that will be used and how it is applied to the project as a whole, or in separate parts. This is key since the County’s Environmental Thresholds and Guidelines Manual states that the VMT Calculator tool does not have the capability to analyze large, complex projects (such as this Countywide AEO project) and therefore it appears that the project would require a VMT Transportation Study, as detailed in subsection I (pgs. 182-183) of the current 2021 Thresholds Manual. However, if the AEO project only considered and reviewed VMT within the EIR in the context of case-by-case impacts, one could determine that the AEO-related uses could be screened out as “small projects” with less than significant impacts because each discrete use would likely generate fewer trips than the 110 average daily trip threshold.

9-16

#### **Subsection 4.2.14 – Cumulative Impacts**

Although briefly mentioned in subsection 4.2.12 (Transportation), the cumulative effects and impacts from having more than one AEO-related use on a single parcel should be thoroughly analyzed and discussed in the EIR.

Similarly, the EIR should provide some analysis and discussion of the methodology that would be used to monitor and determine the future point at which the density of AEO-related uses within an area would exceed one or more thresholds of significance.

9-17

#### **Section 4.3 – Alternatives Analysis**

The Scoping Document states that the EIR will “programmatically describe the major characteristics and significant environmental effects of each alternative.” However, it is unclear what is meant by the use of the term “programmatically.” Is the County intending for the EIR be developed and used as a Programmatic EIR?

9-18

As discussed above in the Land Use and Planning section, a matrix should be developed that discloses the existing and proposed permit paths for each of the uses covered in the AEO in order to provide the substantial evidence needed in the “No Project” alternative. The “No Project” alternative would not prohibit the AEO-related uses, it would instead require that those projects go through the existing permit path(s) for those types of non-typical accessory uses when proposed in the rural AG-II zones. Additionally, in those situations the case-by-case, site-specific analyses would occur for each proposed new use on each individual, subject property, pursuant to CEQA §15126.6(e)(3)(A&C).

9-18  
cont'd

The Alternatives Analysis section should cite Section 3.3 when referencing the basic objectives of the AEO project.

### **Table 1 – Summary of Proposed Ordinance Amendments**

In the heading of the table, the Zoning Clearance (ZC) permit type is grouped with the Land Use Permit (LUP) and the Coastal Development Permit (CDP); however, the ZC is a non-appeal ministerial permit that is very different than the LUP and CDP. The table should separate the ZC into its own column, similar to what was done with the “Exempt” category and at a minimum have this permit path only as an option for uses that exceed development thresholds that would qualify for an exemption, but upon staff review are found to completely avoid all protected resources and clearly do not create any potential for significant impacts identified in the EIR.

9-19

### **Table 1 – Global Comment**

Some use classifications indicate that the development would be exempt as long as “[n]o new structures” are being proposed that would otherwise need permits. However, not all use classifications for the Exempt column include this distinction.

9-20

Please clarify whether the intent of the exemption option would be reserved only for proposed AEO-related uses that would not require new structural development.

### **Table 1 – Campground (small scale)**

It is unclear from the Scoping Document how the 25-foot maximum length was determined for Airstreams or other recreational vehicles. Please explain this.

The table includes a time limit of “14 day max stay” but does not include a temporal comparison, such as 14 days per month or per year. Or is this intended to apply only to “consecutive days” stayed? Furthermore, is this applicable per person, per family, per vehicle, or some other measure?

9-21

## Table 1 – Supplementary Agricultural Uses

Table 1 only mentions cannabis one time on page 18, so it is unclear whether the AEO-related uses would be an available option for AG-II lands under cannabis cultivation. For example, would they be able to have farm-to-table dinners, parties, or other small scale commercial events?

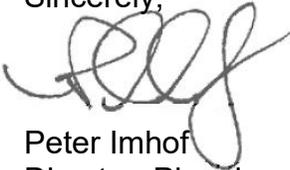
Would AG-II lands under cannabis cultivation be able to develop Campgrounds, Farm Stands, or Educational Experiences or Opportunities, such as guided farm tours or botany classes?

Please clarify the applicability of the AEO project to AG-II lands under cannabis cultivation.

Thank you for this opportunity to comment on the NOP and Scoping Document. We appreciate the County's efforts to support agriculture and agricultural resources and its dedication to protecting our other valuable and sensitive resources throughout Santa Barbara County.

City staff will be available for further discussions with the Project Manager and other County staff, if desired, to give additional context or clarification to this letter where needed, or any requested assistance with advance review of the draft EIR where possible new regulations could directly or indirectly affect the City.

Sincerely,



Peter Imhof  
Director, Planning and Environmental Review Department

cc: Michelle Greene, City Manager  
Anne Wells, Advance Planning Manager  
J. Ritterbeck, Senior Planner

9-22

# LAW OFFICE OF MARC CHYTILO, APC

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ENVIRONMENTAL LAW

December 17, 2021

Julie Harris  
Santa Barbara County Planning & Development  
123 E. Anapamu Street  
Santa Barbara, California 93101

RE: Agricultural Enterprise Ordinance Environmental Impact Report Scoping Comments

*Dear Ms. Harris,*

This office represents the Gaviota Coast Conservancy (GCC), a California public benefit organization dedicated to protecting the rural character and environmental integrity of the Gaviota Coast for present and future generations. A key part of GCC's mission is to encourage regenerative agriculture practices that build soil, manage water wisely, reduce toxic chemical use and support biological resources. Much of the Gaviota Coast has depleted soils exposed from poor coverage practices, neglect and a series of other factors. It has been demonstrated that regenerative agricultural practices can be used as a tool to actively improve soil fertility and carbon sequestration in the soil, along with improving the quality of habitat and other coastal resources while reducing the use of pesticides and destructive agricultural practices.

To advance its mission in this area, GCC awards grants to projects that help expand the acreage and number of farmers and ranchers using regenerative agricultural practices in the Gaviota Coast area, and funds the Gaviota Agricultural Project (GAP) to advise this grantmaking effort, which includes conservation partners at the Community Environmental Council (CEC), Cachuma Resource Conservation District (CRCD), and The Land Trust for Santa Barbara County (LTSBC). A key objective of GAP's work is to identify and address regulatory barriers that stand in the way of more widespread adoption of regenerative agricultural practices. Two regenerative agricultural projects that GAP currently supports have encountered regulatory barriers at the County that have hindered their full implementation, including the Santa Barbara Botanic Garden's pollinator hedgerow project at Las Varas Ranch and the Wild Farmlands Foundation vermicompost Project at Restoration Oaks Ranch. These two projects in turn present an opportunity to advance changes to the County's ordinances that would specifically address these barriers and promote more widespread use of pollinator hedgerows and on-farm composting including vermicomposting, two regenerative agricultural practices which have demonstrated significant benefits both to the environment and to agriculture.

In September, we submitted a letter requesting that certain relatively minor changes to the Land Use and Development Code (LUDC) and Coastal Zoning Ordinance (CZO) be included in the Agricultural Enterprise Ordinance (AEO) Project Description that is analyzed in the Draft Environmental Impact Report (DEIR). This letter reiterates that request, and further discusses

how the environmental benefits of these changes relate to the DEIR's discussion of Project impacts, mitigation measures, and alternatives.

1. Proposed Ordinance Changes to Further Advance the Project's Objectives, Confer Class IV (Beneficial) Impacts, Mitigate Significant Project Impacts, and Advance State and County Policy Goals

a. Small-Scale Composting

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"). Among the changes in the revised Composting General Order are an increase in the quantity of compost and compost-related materials that can be stored on-site at any one time, the amount of compost that may be sold or given away annually, and the allowable feedstocks that can be used (including food waste and manure). Including food waste in the allowable feedstocks is particularly important to enable the County to meet the ambitious food waste diversion targets required by SB 1383.

Wild Farmland's Foundation Gaviota SOIL (Saving Organics Investing in Land) Project has advanced and piloted agricultural composting at Restoration Oaks Ranch to support agriculture resilience, food waste reduction, climate change adaptation, water quality and soil health. The Project, further described in the attached Wild Farmlands Worm Project document (Exhibit A), illustrates the need to expand the small-scale composting provisions currently applicable only within the Gaviota Coast Plan area to Ag-II lands countywide, and to revise limits on feedstock and donation or sale of finished compost to allow small-scale composting operations to be viable. This includes the current provision that limits the availability of a permit exemption (in the inland area) to operations accepting only onsite feedstock.

The Scoping Document provides that the AEO would *reduce* the allowable amount of compost on site at any one time from 500 cubic yards to 100 cubic yards, and continue limiting the off-site transfer of compost to 1,000 cubic yards annually. We're concerned that this will further stifle the viability of small-scale composting operations and will not further the Project's Objectives. We also don't see these changes as being required by or even consistent with State Law including California Code of Regulations, Title 14, Division 7 (see e.g. §17856 (Agricultural Material Composting Operations) and the above mentioned Composting General Order. The DEIR should be clear regarding what is allowed and what is required to be consistent with State Law.

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We encourage the DEIR to broaden its analysis to analyze potential impacts associated with less restrictive limits on small-scale composting operations including our below proposal and/or similar changes. This analysis should address 1) the beneficial environmental impacts

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associated with increased compost application on County rangeland and farmland including those listed in the Composting General Order (quoted above); 2) the different types of composting including vermiculture and a discussion of their relative impacts and benefits; 3) a discussion, potentially in the environmental setting, regarding existing sources of high quality compost available for on-farm utilization in the County; 4) whether more compost is needed to advance the County’s Climate Action Plan goals; 5) whether more composting facilities are needed to achieve increasingly stringent waste diversion requirements; and 6) how less restrictive composting regulations could further advance the Project Objectives, result in Class IV (beneficial) impacts, help mitigate other Project impacts, and advance County and State policy objectives.

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Our proposed ordinance changes are indicated here, in ~~strike through~~ and underline to the current versions of the County’s CZO and LUDC.

COMPOSTING	COASTAL ZONE	INLAND
<p>Recommendation C1:</p> <p>Expand the Gaviota Coast-specific provisions for small scale composting [as modified, see Recommendations C2 and C3, below] to all Ag-II zones in the County.</p>		
<p>Recommendation C2:</p> <p>Currently, for a small scale composting facility to qualify for an exemption in the inland area, it cannot accept any feedstock from off-site. We recommend introducing some flexibility for farmers by allowing up to 50% of the feedstock to originate off-site. [Note, the remainder of the changes indicated in <del>strike through</del> and <u>underline</u> are identical to those proposed</p>	<p>[no exemption]</p>	<p><b>LUDC § 35.21.060</b>  <b>C. Specific Land Uses</b>  <b>2. Composting (small scale).</b>                      a. A composting (small scale) operation may be allowed with an <b>exemption</b> in compliance with <a href="#">35.20.040 (Exemptions from Planning Permit Requirements)</a> if the activity complies with the following development standards.                      (1) <u>At least 50% of t</u><del>The</del> feedstock for the composting operation originates from onsite.</p>

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<p>in Recommendation C3, see below.]</p>		<p>(2) The operation does not propose the construction of any new structure(s) or any additions to existing structures that would require a planning permit or new water or wastewater permit.</p> <p>(3) There is no more than <del>500 cubic yards of compost</del> <u>25,000 cubic yards of a combination of allowable feedstocks, compost (active, curing, and final product), additives and amendments</u> on-site at any one time.</p> <p>(4) No more than <del>15,000</del> <u>15,000</u> cubic yards of compost is sold or given away annually.</p> <p>(5) <del>The compostable material may also include up to 10 percent food matter.</del> <u>Allowable feedstocks include agricultural materials, green materials, manure, and spoiled or unsalvageable food commodities.</u></p> <p>(6) Compost piles shall not exceed 12 feet in height.</p> <p>(7) The operator of the Composting (small scale) operation shall maintain and follow an odor abatement plan per Santa Barbara County Air Pollution Control District guidance.</p> <p>(8) The operation shall be located a minimum of 200 feet from any adjacent lot and 300 feet from any dwelling located on an adjacent lot.</p> <p>(a) The applicable setback does not apply if the adjacent</p>
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		<p>lot is under the same ownership as the lot that the operation is located on.                  (b) The operation shall be considered to comply with these setback requirements, and shall not be considered nonconforming, if, after the operation commences production, a dwelling is constructed on an adjacent lot that is not under the same ownership as the lot that the operation is located on and the location of the dwelling is within the setback distance specified above.</p>
<p>Recommendation C3.</p> <p>We recommend increasing the amount of compost related materials that can be stored on-site at any one time, the amount of compost that may be sold or given away annually, and the allowable feedstocks that can be used (including food waste and manure). Each of these changes is consistent with the State Regional Water Quality Control Board's <i>revised</i> General Composting Order.</p>	<p><b>CZO Division 17 – GAV Overlay</b>  <b>§ 35.460.G. Composting.</b>                  1. A composting operation may be considered a component of the Principal Permitted Use and be allowed in compliance with a <b>Coastal Development Permit</b> issued in compliance with <b>Section 35-169</b> (Coastal Development Permits) provided the operation complies with the following development standards.                  a. All of the feedstock for the operation originates from within Santa Barbara County.                  b. No new structure(s) that would require a planning permit or new water or wastewater permit issued by the County are proposed.                  c. There is no more <del>than 500 cubic yards of compost</del> <u>25,000 cubic yards of a combination of allowable</u></p>	<p>b. A composting (small scale) operation may be allowed in compliance with a <b>Land Use Permit</b> issued in compliance with <b>Section 35.82.110 (Land Use Permits)</b> if the activity complies with the following development standards.                  (1) All of the material used in the operation shall originate within Santa Barbara County.                  (2) The operation does not propose the construction of any new structure(s) or any additions to existing structures that would require a planning permit or new water or wastewater permit.                  (3) There is no more <del>than 500 cubic yards of compost</del> <u>25,000 cubic yards of a combination of allowable feedstocks, compost (active, curing, and final product),</u></p>

	<p><u>feedstocks, compost (active, curing, and final product), additives and amendments</u> on-site at any one time.</p> <p>d. No more than <u>±5,000</u> cubic yards of compost sold or given away annually.</p> <p>e. <del>The compostable material may also include up to 10 percent food matter.</del> <u>Allowable feedstocks include agricultural materials, green materials, manure, and spoiled or unsalvageable food commodities.</u></p> <p>f. Compost piles do not exceed 12 feet in height.</p> <p>g. The operator of the operation shall maintain and follow an odor abatement plan in compliance with Santa Barbara County Air Pollution Control District recommendations.</p> <p>h. The operation is in compliance <u>Section 35-102G</u>. (CVC - Critical Viewshed Corridor Overlay District), if applicable.</p> <p>i. The operation shall be located a minimum of 200 feet from any adjacent lot and 300 feet from any dwelling located on an adjacent lot.</p> <p>1) The applicable setback does not apply if the adjacent lot is under the same ownership as the lot that the operation is located on.</p> <p>2) The operation shall be considered to comply with these setback requirements, and shall not be considered nonconforming, if, after the</p>	<p><u>additives and amendments</u> on-site at any one time.</p> <p>(4) No more than <u>±5,000</u> cubic yards of compost is sold or given away annually.</p> <p>(5) <del>The compostable material may also include up to 10 percent food matter.</del> <u>Allowable feedstocks include agricultural materials, green materials, manure, and spoiled or unsalvageable food commodities.</u> (6) Compost piles shall not exceed 12 feet in height.</p> <p>(7) The operator of the Composting (small scale) operation shall maintain and follow an odor abatement plan per Santa Barbara County Air Pollution Control District guidance.</p> <p>(8) The operation is in compliance <u>Section 35.28.070 (Critical Viewshed Corridor (CVC) Overlay)</u>, if applicable.</p> <p>(9) The operation shall be located a minimum of 200 feet from any adjacent lot and 300 feet from any dwelling located on an adjacent lot.</p> <p>(a) The applicable setback does not apply if the adjacent lot is under the same ownership as the lot that the operation is located on.</p> <p>(b) The operation shall be considered to comply with these setback requirements, and shall not be considered nonconforming, if, after the</p>
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	<p>operation commences production, a dwelling is constructed on an adjacent lot that is not under the same ownership as the lot that the operation is located on and the location of the dwelling is within the setback distance specified above.</p>	<p>operation commences production, a dwelling is constructed on an adjacent lot that is not under the same ownership as the lot that the operation is located on and the location of the dwelling is within the setback distance specified above.</p>
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b. Pollinator Hedgerows

Pollinator hedgerows are diverse linear plantings of flowering plants (typically natives) designed to provide foraging and nesting habitat for pollinators. Pollinator hedgerows provide year-round habitat for insects that provide both pollination and pest control services, and thus enable farms to be both more sustainable and more cost effective. The attached letter from Denise Knapp, Ph. D., Director of Conservation and Research at the Santa Barbara Botanic Garden includes a review of scientific literature explaining these benefits of pollinator hedgerows in greater detail. (Exhibit B). Despite these benefits, which have been shown elsewhere in California and beyond, pollinator hedgerows are highly under-utilized in Santa Barbara County. One reason for this under-utilization is the concern that farmers may be constrained in their ability to remove hedgerows comprised of native plants if the County<sup>1</sup> determines the hedgerows must be protected as habitat. This concern is particularly acute in the Coastal Zone (where the Las Varas Ranch pollinator hedgerow project is located), where the broad definition of Environmentally Sensitive Habitat (ESH) could potentially be used to argue that removal of a native plant hedgerow constitutes a violation of the Local Coastal Program (LCP).

While Pollinator Hedgerows are not an identified category of use in the AEO Scoping Document, we believe addressing barriers to implementation of this regenerative agricultural practice furthers the AEO’s Project Objectives, and should be integrated into the DEIR either as a component of the Project Description, a Mitigation Measure to help reduce other Project impacts, and/or as part of a Project Alternative geared toward further encouraging regenerative agricultural practices.

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The following proposed changes to the CZO and LUDC state that the creation of pollinator habitat is encouraged on agriculturally zoned parcels, and clarify the circumstances under which

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<sup>1</sup> While the California Department of Fish and Wildlife, and the California Coastal Commission in the coastal zone, each have enforcement authority over endangered and threatened species and Environmentally Sensitive Habitat Areas (respectively), advancing these changes at the County level is a necessary first step to addressing this issue more broadly.

pollinator hedgerows are exempt from Coastal Development Permit. Proposed ordinance changes are indicated in ~~strike through~~ and underline in the current versions of the CZO and LUDC.

<b>Pollinator Hedgerows</b>	<b>Coastal Zone</b>	<b>Inland</b>
<p>Recommendation P1:</p> <p>We recommend including language specifically encouraging regenerative agricultural practices including those that support pollinator habitat as part of the purpose of the agricultural zones.</p>	<p><b>CZO Division 4 – Zoning Districts</b>  <b>Section 35-69. AG-II - Agriculture II</b>  <b>Section 35-69.1 Purpose and Intent.</b>                      The purpose of the Agriculture II district is to establish agricultural land use for large prime and non-prime agricultural lands in the rural areas of the County (minimum 40 to 320 acre lots) to preserve prime and non-prime soils for long-term agricultural use.  <u>Regenerative agricultural practices that improve soil, manage water wisely, support pollinator habitat, capture atmospheric carbon, and improve climate resiliency are strongly encouraged.</u></p>	<p><b>LUDC § 35.21.020. Purposes of the Agricultural Zones.</b>  <u>C. Within the agricultural zones, regenerative agricultural practices that improve soil, manage water wisely, support pollinator habitat, capture atmospheric carbon, and improve climate resiliency are strongly encouraged.</u></p>
<p>Recommendation P2:</p> <p>The Gaviota Coast-specific exemption for ongoing/historic cultivated agriculture includes “creation of pollinator habitat”. We recommend adding “the modification and removal of previously created pollinator habitat” which is consistent with the existing exemption’s purpose to “support the ongoing use and enable the operation to</p>	<p><b>CZO Division 17, GAV Overlay</b>  <b>§ 35-430.D.2</b>  <b>2. Cultivated agriculture, orchards, and vineyards, historic, ongoing use.</b>                      Cultivated agriculture, orchards, and vineyards where the agricultural activities occur within existing areas of ongoing cultivated agriculture, orchards, and vineyards, including crop rotation, soil enhancement, compost</p>	

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<p>respond to changing conditions”.</p>	<p>application, creation of pollinator habitat, <u>modification and removal of previously created pollinator habitat</u>, and irrigation system changes that support the ongoing use and enable the operation to respond to changing conditions, and where there is evidence of ongoing agricultural use on the site within the previous 20 year period do not constitute “development” and therefore do not require a permit. New or expanded cultivated agriculture, orchards, and vineyards are not exempt and shall be subject to the permit requirements of Table 17-2 (Allowed Land Uses and Permit Requirements for the Gaviota Coast Plan Area).</p>	
<p>Recommendation P3.</p> <p>Because the AEO does not involve extending the cultivated agriculture exemption for the Gaviota Coast Plan Area on a Countywide basis, we also propose including pollinator hedgerows in the list of agricultural activities that are exempt from CDP throughout the County’s Coastal Zone.</p>	<p><b>CZO § 35-51B. Exemptions from Planning Permit Requirements.</b></p> <p><b>B.3. Agricultural activities.</b> As part of existing, on-going lawfully established agricultural operations, the following development and uses are exempt from the requirement to obtain a Coastal Development Permit, except as provided in Subsection B.1 (Exemption does not apply), above.</p> <p><b>a. Agricultural accessory structures.</b> [ ]</p> <p><b>b. Agricultural product sales.</b> See <a href="#">Section 35-131</a> (Agricultural Sales).</p> <p><b>c. Fences, gates, gateposts, and walls.</b> See <a href="#">Section 35-</a></p>	

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	<p>123 (Fences, Walls and Gate Posts).</p> <p><b>d. Grading.</b> Grading activities of 50 cubic yards or less that do not require the approval of a Grading Permit.</p> <p><b>e. Irrigation lines.</b> The installation of irrigation lines provided the approval of a Grading Permit is not required.</p> <p><b><u>[new]. Pollinator hedgerows.</u></b> <u>The creation, maintenance, modification, and removal of pollinator habitat within existing areas of ongoing cultivated agriculture.</u></p> <p><b>f. Propane tanks.</b> [ ]</p> <p><b>g. Signs, flags, and similar devices.</b> [ ]</p> <p><b>h. Structures of limited value.</b> [ ]</p>	
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We appreciate your consideration of these comments, and request that they be addressed in the AEO DEIR.

Respectfully Submitted,

LAW OFFICE OF MARC CHYTILO, APC



Ana Citrin  
For Gaviota Coast Conservancy

Exhibit A: Wild Farmlands Worm Project Report

Exhibit B: Santa Barbara Botanic Garden Pollinator Hedgerow Support Letter

# Wild Farmlands Worm Project

## INTRODUCTION

The Wild Farmlands Foundation is piloting a vermicasting system on Restoration Oaks Ranch to document and demonstrate vermicast (or compost made from worms) as a tool for climate and agricultural resilience. Vermicast (often described as vermicompost) is produced in a short period of time and has dense microbial life and macro and micro nutrients, making vermicomposting one of the most efficient and effective ways to boost soil health. Large-scale on-farm composting can be a viable and sustainable resource for Santa Barbara County's agricultural industry, while helping our region reduce food waste and achieve climate adaptation goals. Yet, there are regulatory, financial and logistical barriers to adoption in our region. This project is a "proof of concept" that aims to demonstrate the viability of on-farm vermicomposting, identify and document barriers, and showcase the community-wide benefits if scaled up.

### **This project is attempting to answer the following questions:**

- Can vermicast improve the health and productivity of perennial blueberry bushes?
- Can vermicast increase the cropland's soil health and its ability mitigate climate change through carbon sequestration?
- Can vermicast replace to a significant extent the cropland's reliance on synthetic fertilizer application?
- Can vermicast liquid extract inexpensively replace solid form composting in grazing land restoration projects?
- Is vermicast more effective than processed compost in regenerating and sustaining healthy soil?
- Can scaled on-farm vermicompost systems help Santa Barbara County achieve its climate goals, food waste diversion goals, and agricultural preservation goals in a real way?

## PROJECT GOALS

- Vermicast production and application:** We are producing vermicast and vermicast extract, and applying it to a 7-acre plot of organic blueberries. We started with a 5 x 16 foot vermicast bin and expand our production when capacity is available.
- Research:** In partnership with research partners, we developed a baseline soil assessment and ongoing monitoring plan. We are studying the nutrient load, the pathogen load and the biological activity of the vermicast, in addition to comprehensive soil testing, plant health indicators, and fertility inputs.
- Demonstration:** This demonstration project aims to increase regional knowledge of on-farm food waste diversion and soil health for the agricultural community, including site visits, a promotional video, and accessible materials for local farmers and ranchers.
- Policy advocacy:** We have engaged local regulatory agencies in this project, to fully permit these bins. This allowed us to identify policy barriers, and engage policy-makers in on-farm food waste reduction and soil health practices.



One goal of this project is to prove that healthier soil communities improve the efficiency of the transfer of nutrients with their plants, reducing their need for fertilizers while increasing the health and yield. Our target fertilizer reduction is 50%, gradually reduced over 3 years. At a 50% reduction in the cost of fertilizer, the cost savings would be up to to \$235/acre/year.

## PROJECT PARTNERS

Wild Farmlands Foundation / Restoration Oaks Ranch  
Santa Barbara Blueberries  
Community Environmental Council  
Santa Barbara City College  
Soil Life Services LLC  
Tritech Agriculture  
Regenerative Soils LLC  
New Frontiers Market  
The Coffee Cabin  
Flag is Up Farms  
Gaviota Coast Conservancy (Funder)

## PROJECT NEXT STEPS - PHASE 2

**Scale:** Grow vermicast and compost production by purchasing new vermicast bins or developing windrows

**Research:** Comprehensive soil testing on Control and Treatment plots to determine nutrient, biological and financial impacts of vermicast tea

**Educate:** Host field days and site visits with farmers, ranchers, students and policy-makers to showcase benefits of vermicast

**Fundraise:** Secure funding for Phase 2 of the project, to accomplish above tasks

## PROJECT RESULTS

### Research Site

3 acres

Collected Baseline Soils Data - November 2019

### Food Waste Diversion

Diversion of ~7,500 pounds of wasted food from the landfill per year (150-200 pounds of food waste/week)

Diversion of ~2,500 pounds of horse manure per year

### Vermicast and Vermicast Extract\* Production

Production of 60 pounds of vermicast/week, 13120 pounds of vermicast per year

Production of 115 gallons per week (10 gallons/week/acre), 6000 gallons per year

### Carbon Sequestration and Emissions Reduction

Offset of approximately 6 Metric Tons of CO2 emissions annually due to food waste diversion.

Sequestration of approximately 13 Metric Tons of CO2 due to improved soil health

### Plant Health

During the first few weeks of extract application we noticed a flush of weeds solely on the berms of the blueberries where extract was applied. We could infer that this is an indication of increased nutrient cycling in the soil.

### Vermicast Quality and Safety

#### Nutrients (Soil Control Labs)

Nitrogen Phosphorus and Potassium: 5.6 % dry wt: High Nutrient Content

*This value is the sum of the primary nutrients Nitrogen, Phosphorus and Potassium. Reported units are consistent with those found on fertilizer formulations. A sum greater than 5 is indicative of a compost with high nutrient content, and best used to supply nutrients to a receiving soil. A sum below 2 indicates low nutrient content, and is best-used to improve soil structure via the addition of organic matter. Most compost falls between 2 and 5.*

#### Biology (Soil Domains LLC)

*Good results: Vermicast has a healthy balance of fungi (Fungi: Bacteria, 0.62, 450:700.) and is more fungally dominated than the soil. However, we will still need to increase fungal biomass for blueberry plants that require fungal domination (Fungi:Bacteria between 2:1 and 5:1.)*

#### Pathogens (Soil Control Labs, Abalone Coast Analytical)

*E. coli test*

*Salmonella test*

*Not detected*

*Not detected*

## POLICY AND REGULATIONS

There are at least eight agencies at local and state levels that regulate the transportation and processing of food and organic materials, and the distribution or sale of finished compost. The maze of regulations often prevents landowners from pursuing on-site scalable composting solutions, and the potential for liability generally makes community involvement infeasible. This project aims to fully engage our regulatory bodies to showcase policy barriers and opportunities for regulatory alignment. If better aligned, County agencies can support agricultural operations and community-based organic waste diversion. In this way, agricultural properties in Santa Barbara County can serve as strategic locations for community organic resource recovery, climate resilience and carbon sequestration.

The details of this project made it exempt from many permits, which we hope will encourage others to explore composting. The below table outlines regulatory barriers and opportunities based on this project.

## PROJECT SPECS

- Vermicast/vermicomposting system (worm-based composting)
- Processing 25/75 mix of horse manure and food waste
- Processing less than 100 cubic yards/750 square feet of material on-site at any time
- No gas generator or back-panel electrical installation
- No water use or waste water discharge
- No odors or noise
- No transportation of finished product off-site
- Not charging money for transportation of food waste

Regulatory Agency	Applicable Regulations	Permit Exclusion
Santa Barbara County Environmental Health Division (CalRecycle Local Enforcement Agency)	CalRecycle Permit (Notification, Registration, Full)	<b>No permit needed<sup>1</sup></b> <i>Explanation: Processing less than 100 cubic yards/750 square feet of material on-site at any time</i>
Santa Barbara County Planning Department	Planning Permit (Excluded, Land Use Permit, Minor Conditional Use Permit)	<b>No permitting process currently<sup>2*</sup></b> <i>*Contingent on 2021 Agricultural Enterprise Ordinance</i>
Santa Barbara County Building Department	Electrical and Building Permit	<b>No permit needed<sup>3</sup></b> <i>Explanation: No gas generator or back-panel electrical installation</i>
Central Coast Regional Water Quality Control Board (State Water Resources Control Board Enforcement Agency)	Waste Discharge Requirement Permit	<b>No permit needed<sup>4</sup></b> <i>Explanation: No water use or waste water discharge</i>
Santa Barbara County Air Pollution Control District	Odor Abatement Plan	<b>No permit needed<sup>5</sup></b> <i>Explanation: No regulation for small to large-scale composting</i>
Santa Barbara County Public Works Department	Hauling License	<b>No permit needed<sup>6</sup></b> <i>Explanation: Not charging money for transportation of food waste</i>
California Department of Food and Agriculture, Fertilizing Materials Inspection Program	Compost Sale/Distribution	<b>No permit needed<sup>7</sup></b> <i>Explanation: No transportation of finished product off-site</i>

[https://library.municode.com/ca/santa\\_barbara\\_county/codes/code\\_of\\_ordinances?nodeId=CH35ZO\\_SABACOLAUSDECO](https://library.municode.com/ca/santa_barbara_county/codes/code_of_ordinances?nodeId=CH35ZO_SABACOLAUSDECO)

<sup>1</sup> CA Code of Regulations, Title 14, Division 7, Chapter 3.1, Article 2, 14 CCR 17855 <https://www.calrecycle.ca.gov/LEA/Regs/Tiered/TierChart/>

<sup>2</sup> Based on definition of “Cultivated Agriculture, Orchard and Vineyard.” SB County Planning and Development Code Section 35.21.060, 35.42.040

<sup>3</sup> County Building Regulations, Chapter 10, Sec. 10-1.6

<sup>4</sup> California Composting General Order, Section 30

<sup>5</sup> County Solid Waste Services Code, Chapter 17, Article II.

<sup>6</sup> Food and Agricultural Code, Division 7, Chapter 5, Article IV and V. and CA Code of Regulations, Title 3, Article 3, Section 2319.

# CHALLENGES AND RECOMMENDATIONS

## **Challenge:**

Right now, if an operator of a on-farm composting system were to donate or sell the end product, they would be categorized as an “Agricultural Processing Facility,” which would require a Minor Conditional Use Zoning Permit from the Santa Barbara County Planning Department. Obtaining this permit is expensive and lengthy.

## **Recommendation:**

Amend Santa Barbara County Planning Department language to allow for donation, sale, or distribution of materials off-site of <5,000 cubic yards annually (consistent with SWRCB Composting General Order).

## **Challenge:**

Right now, depending on your location, the County defines “small-scale” composting in different ways, which are misaligned with CalRecycle and State Water Resources Control Board regulations. Limiting operations to <100 cubic yards is a significant barrier to innovative waste solutions and compost production.

## **Recommendation:**

- Amend Santa Barbara County Planning Code to allow for on-farm composting in alignment with CA Water Resources Board general order on “agricultural composting”
- Create definitions which allow farms to compost green material, agricultural material, food material, and vegetative food material as feedstocks, alone or in combination, including material from off-site.

## **Challenge:**

SB 1383 requires municipalities to meet ambitious food waste diversion targets. Nothing in the law prevents a generator from preventing food waste, managing their waste on-site, or donating food waste to community-based composting operations. Yet, current Planning code limits on-farm composting to 10% food waste, which was originally pulled from CalRecycle code that has since been removed (35.21.060).

## **Recommendation:**

- Consult on-farm and community-based compost operators in the county’s organics diversion planning processes, and estimate the cumulative capacity of small-scale facilities to divert materials.
- Remove any percentage limitations on food waste, particularly the 10% food waste limit in Planning and Development Code 35.21.060.

## **Challenge:**

Right now, the County of Santa Barbara has an exclusive franchise hauling agreement with Marborg Industries. This means that the only entity that can transport organic material, and get paid for it, is the single hauler with which the County has contracted with. This prevents farmers and land managers from partnering on local food waste solutions, and limits entrepreneurial opportunities for composting. This is a significant barrier.

## **Recommendation:**

- Remove restrictions on community-based transportation and hauling
- Amend public works code to allow for community-based hauler
- Amend planning code to remove barrier to off-site feedstock sourcing (35.21.060)

Dear Santa Barbara County Planners,

I am writing to support changes in County legislation that would make it easier for Santa Barbara County food producers to plant native hedgerows without fear of the repercussions should they need to later remove that hedgerow. Native plant hedgerows on farms increase both agricultural efficiency and sustainability in at least three ways: by attracting native pollinators, reducing soil loss and runoff, and by increasing natural pest control, thus reducing the need for pesticides. Installing areas of perennial native plants within farms increases the cost-effectiveness of cropland through improved pollination (Carvalho et al. 2012). Furthermore, insect pollination and pest control can synergistically benefit crop production, resulting in even greater overall benefits to the farmer (Lundin et al. 2013). The costs of installing native plant areas can be more than recouped by the producer in at little as 3-4 years through increased yields (Blaauw and Isaacs 2014).

Pollinators make possible about one in three of every bite or drink we take, with insect-pollinated crops estimated to be worth at least \$18-27 billion (Mader et al. 2011). Improved pollination services result in increased fruit/seed set and thus yield. European honey bees have been an important source of these services, however they have been in a major decline. Indeed, we are losing nearly 50% of commercial bee hives each year, with costs of renting these hives skyrocketing. Wild pollinators are often even more effective than honey bees as pollinators (Garibaldi et al. 2013), but unfortunately, native pollinators are in decline too (Potts et al. 2010), due in large part to habitat loss, fragmentation, and degradation (Mader et al. 2011), as well as agricultural intensification (Grixti et al. 2009). Crops planted as monocultures (vast areas of one plant) are inhospitable to bees and other pollinators which require longer term sources of nectar and pollen, while intense tilling destroys native bee nesting grounds.

Increasing floral diversity on farms not only attracts wild pollinators but also attract beneficial insect predators and parasites that can stem outbreaks of crop pests. It has been clearly shown that natural habitat on or adjacent to active farmland supports a higher abundance and diversity of insect predators and parasitoids ("beneficials") than cropland (e.g., Morandin et al. 2014). Beneficial predator and parasitoid insect populations increase with the amount and diversity of non-crop habitat around the farm (Ricketts et al. 2008), resulting in greater pest suppression (Thies and Tschardtke 1999; Thies et al. 2003). Native plant habitat has been shown to attract more beneficial insects than pests, while weedy areas have the opposite effect (Morandin et al. 2011).

Benefits of native habitat buffers are not limited to increased pollinator services and natural pest management. Adjacent habitat buffers can also help to stabilize the soil and minimize runoff, thus improving water quality. Further, native ground covers between perennial crops such as grapes and berries can fix nitrogen and discourage weeds, reducing the need for chemical fertilizers and

herbicides. Establishing new habitats to conserve species diversity where people live, work, and play like this has been termed "reconciliation ecology" (Rosenzweig 2003) and should be actively encouraged by the County.

Thank you for your consideration,

Denise Knapp, Ph.D.  
Director of Conservation and Research  
Santa Barbara Botanic Garden  
(805) 682-4868  
[dknapp@sbbg.org](mailto:dknapp@sbbg.org)

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**From:** [mary heyden](#)  
**To:** [Plowman, Lisa](#); [Klemann, Daniel](#); [Harris, Julie](#); [Lackie, David](#)  
**Subject:** Agricultural Enterprise Ordinance - NOP & Scoping of an EIR  
**Date:** Saturday, December 18, 2021 10:36:35 AM

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**Caution:** This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Hello!

This is Mary Heyden. My family owns and operates the Ted Chamberlin Ranch outside of Los Olivos. I am a third generation rancher, and co-manage the Ranch with my cousin Russell Chamberlin. We are honored and humbled to be the stewards of the 8000-acre property purchased by our grandfather, Ted Chamberlin back in 1929.

While honoring the 93 years of cattle ranching traditions, we are also excited to be progressing into regenerative ranching and farming practices with the aim of adding organic matter into the ground to increase the soil's water holding capacity, nourish the microbial life to support greater perennial grass growth, create a more diverse biosphere for happier and healthier cattle, while sequestering carbon from the atmosphere. We have been supported by and partnered with the Marin Carbon Project, the National Resource Conservation Service, the Cachuma Resource Conservation District, the Santa Barbara Community Environment Council, UCSB, UC Berkeley, and many many others...! Without the financial, material and intellectual support from all these groups, many of our regenerative practices would not be possible.

Agriculture in Santa Barbara County is priceless! It provides economic, environmental, fire mitigation, recreational, quality of life, view shed/open space, and cultural value to our community. Yet every year it feels like "agriculture" gets less and less viable. It will become even more difficult with the implementation of the recently created Groundwater Sustainability Plans that have been proposed by the local (mainly North County) Basin Agencies. The vast majority of the management actions and fees will on the backs of agriculturalist. In a nutshell, agriculture will be even harder to maintain and financially sustain.

I very much appreciate "the County's" acknowledgement of these facts and its desire to create an Ordinance that will allow for greater opportunity to produce income on agricultural lands. Unfortunately, I do not believe the scope of the current proposed draft will allow for meaningful supplementation of income revenue. In fact, I believe it will be more restrictive than not having an Ordinance at all.

I was disappointed that "tiered" only related to the level of permit needed (or not). The current proposal does not include the definition of tiered as "scaled to size of premise". It does not make a lot of sense to limit the enterprise on a 400-acre premise (or 4000, or 8000-acre) to a size that may be reasonable on an Ag II 40-acre parcel. For example, an exempted wedding of up to 50 attendees may be a perfect size at a venue on 40-acres. It would be an extremely restrictive limit on our ranch. The great thing about larger parcels is they are often located farther away from urban centers and have much greater setbacks from the surrounding neighbors, who often are agricultural parcels as well. This allows for larger "events" with little to no impact to the residential folk. Noise, lights and traffic must always be considered no matter the parcel size. But these very valid concerns are much easier to mitigate on large premises than on small.

The one thing my family's ranch has is space...and it is beautiful! A few years ago, the Ted Chamberlin Ranch "hosted" a Spartan Run. People came from all over California, the US and the globe to participate in the various arduous races. It was crazy! I was blown away at how happy and grateful people were to have access to our property. This is land that I often take for granted! But this experience gave me renewed appreciation for just how incredible (and unique) the ranching landscape of the Santa Ynez Valley truly is. It was so amazing to be able to share our little corner of heaven with all these crazy, fun, enthusiastic people! I would really like to be "allowed" to do so with more people. Yes, the Spartan Race was a MUCH greater scaled event than what will be covered in the Ag Enterprise Ordinance, but

"reasonably-scaled" events should be included in the scope of the Ordinance. There are many horseback riding groups, running groups, mountain biking groups, "back-to-earth" educational groups, etc. that need space to hold weekend and week-long events. We are the perfect spot for this. Weddings, workshops, harvest parties, etc. also need venues. Again, our ranch would be ideal for these folks. I ask that exemptions be given at a scalable size to the premise.

11-1  
cont'd

"Compatibility" is a crucial component of any Ag Enterprise Ordinance. All other "non-ag" enterprises MUST be compatible to the primary agricultural business. Hosting groups in different spots throughout the year IS compatible with our cattle operations. To properly graze cattle, the rancher must move the livestock around to take best advantage of the forage - and more importantly, the rancher must also give the grasslands rest in-between. "Prescribed grazing" is what makes cattle ranching environmentally beneficial. Rotating cattle from pasture to pasture, focusing on giving pastures adequate rest, allows for regeneration of the forage and diversity of the biosphere. For long periods of time, pastures do not contain cattle. It would be very compatible to allow people to ride horses, or run through, or host a wedding during these resting periods. And then when they are done, they are gone!

I thank you all for all the time and consideration you have put into the Ordinance! If you have any questions, please contact me anytime.

Sincerely,

Mary

1-805-350-1854

Marysneedles@yahoo.com

**From:** [Nancy Black](#)  
**To:** [Harris, Julie](#)  
**Subject:** Public Comment - Environmental Scoping Meeting | Ag Enterprise Ordinance  
**Date:** Monday, December 20, 2021 1:39:33 PM

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**Caution:** This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

I would like to comment in support of small scale farm production. It's important to our region to keep our local farmers in business; they're a vital part of a sustainable food system in a place where our main economy is agricultural, and yet products are shipped out of County, and what we consume is shipped in. We need more of a closed loop system, and small local farmers are the key to this. We found out how badly we need local food sources when the freeway was cut off during the debris flow. Summerland went without food shipments for days, without a food market in town. A small farmer stepped into that niche, with a local food cart. Even in our productive County, there are food deserts.

These small producers are operating on tiny profit margins. By widening the scope of the services that they can provide, we are helping their businesses to grow, supporting our local food system and keeping that farmland open and undeveloped. Otherwise, if farms can't stay in business, they'll sell and their agricultural properties risk development into shopping malls or expensive housing.

It's a low cost and simple way to conserve land. We don't need to own the land to preserve it for wildlife and open spaces. We can support local farmers to save their farms and to farm regeneratively. Our area is ripe for carbon farming, too.

Let's support farmstays, events, products and services for our local farmers. The better they do, the better our local community eats. It has circularity. For local food security, we need our local farmers.

12-1

Thank you,  
Nancy

[nancy@mercurypress.com](mailto:nancy@mercurypress.com)

**Nancy Black**  
Cofounder, [Producer](#), Storyteller



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[nancy@mercurypress.com](mailto:nancy@mercurypress.com) | [mercurypress.com](http://mercurypress.com)

**From:** [Randy Jones](#)  
**To:** [Harris, Julie](#)  
**Subject:** Public Comment - Environmental Scoping Meeting | Ag Enterprise Ordinance  
**Date:** Monday, December 20, 2021 6:25:26 PM

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**Caution:** This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Hi Julie,

I have been following this process this Fall. Thank you for considering all these issues. I think that the changes will be good for our County and Agriculture!

I have a few very minor comments.

1. I think that Campers, Trailers and Park Models should be longer--I would go with 40 ft. Enforcing this is not worth the County's time and is not helpful to the landowner to promote their operations. | 13-1
2. I would also remove the 50% use limitation on the campsites--again, hard to enforce and just another issue for a farmer to worry about. | 13-2
3. I would make small scale educational events exemption from permitting up to 100 people per event. | 13-3
4. I would make Small Scale Events up to 100 attendees and allow at least 24 per year on an Exempt basis. I don't think 50 attendees and only 8 per year will be financially viable for most entities. | 13-4
5. I would raise the Small Scale Event attendee numbers for the minor use permitting as well--up to 200 would be better. | 13-5

That is really all I have. The above changes will make it more financially viable for our small farmers and ease the regulatory enforcement requirements on the County and our Ag community.

Thanks so much,

Randy Jones  
Pork Palace and Hometown Insurance Owner  
Gaviota/Buellton  
805-350-1459

**From:** [paulvanleer@ucsb.edu](mailto:paulvanleer@ucsb.edu)  
**To:** [Harris, Julie](#)  
**Subject:** Agriculture Enterprise Ordinance Comments  
**Date:** Monday, December 20, 2021 10:26:31 AM

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**Caution:** This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Good Morning Ms. Harris.

I wanted to let you know that I support the Santa Barbara Cattleman's Association Letter, dated December, 13<sup>th</sup> 2021.

Thank you for your consideration.

Paul Van Leer

14-1

**From:** [Plowman, Lisa](#)  
**To:** [Klemann, Daniel](#); [Lackie, David](#); [Harris, Julie](#)  
**Subject:** FW: COLAB COMMENTS on Ag Enterprise  
**Date:** Tuesday, December 21, 2021 11:24:39 AM

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fyi



**Lisa Plowman**  
**Director**

Planning & Development  
123 E. Anapamu St.  
Santa Barbara, CA 93101  
805-568-2086

[lpowman@countyofsb.org](mailto:lpowman@countyofsb.org)

<http://www.countyofsb.org/plndev/home.sbc>

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**From:** Andy Caldwell <[andy@colabsbc.org](mailto:andy@colabsbc.org)>  
**Sent:** Friday, December 17, 2021 7:27 AM  
**To:** Plowman, Lisa <[lpowman@countyofsb.org](mailto:lpowman@countyofsb.org)>  
**Subject:** COLAB COMMENTS on Ag Enterprise

**Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.**

Dear Director Plowman,

COLAB wishes to “ditto” the comments of the Santa Barbara County Cattleman’s Association on the Ag Enterprise Ordinance.

15-1

We believe it is staff’s duty to give the public and the decision makers the widest possible latitude in determining the scope of options within the ordinance so as to not tie their hands by saying that the EIR did “not include that in the analysis”.

The best way to do that is to have a REAL review of the proposed options in a full blown hearing before the PC and the BOS.

15-2

Thank you for your consideration of these comments.

Andy Caldwell  
COLAB



December 21, 2021

County of Santa Barbara  
Planning and Development Department  
Attention: Julie Harris, Project Manager  
123 E. Anapamu St.  
Santa Barbara, CA 93101  
[jharris@countyofsb.org](mailto:jharris@countyofsb.org)

Re: Santa Barbara County Agricultural Enterprise Ordinance Scope of Environmental Review Analysis

Dear Planning and Development Department:

The Grower-Shipper Association of Santa Barbara and San Luis Obispo Counties represents over 170 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 opportunity to comment on the scope of the Environmental Impact Report (EIR) for the development of the Ag Enterprise Ordinance. We 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 appreciate the tremendous diversity of agriculture in Santa Barbara County and have been consistent in advocating that this diversity is important because it provides resilience to both the agricultural sector and the County as a whole. We offer the following comments to assist with achieving the intended benefits while minimizing potential unanticipated conflicts and negative consequences of the Ordinance.

1. Most of our members engage in forms of agriculture that are high-intensity to support the high costs of doing business in Santa Barbara County and pressure to meet growing global food demands. As such, our members’ farms and ranches are industrial places of work and should be recognized as such. Noise, dust, light, odors, and materials applications are all inherent in many agricultural operations and might trigger conflict when more bucolic, tourist-oriented activities and events are introduced into industrial places of work. Examples of activities contemplated by the Ordinance that might trigger land use conflicts between production agriculture and other uses include: campgrounds, food service, dinners, cooking classes, events, and other activities. The expansion of these uses should occur in locations and in such a way that it does not inadvertently undermine agricultural production in this County.
2. Additionally, our members grow fresh, healthy produce that is usually not cooked before it is consumed; as such, our members are required to comply with a variety of strict food safety regulatory and buyer requirements. Examples include but are not limited to the U.S. Food and Drug

16-1

16-2

Administration (FDA) Food Safety Modernization Act (FSMA), the California Leafy Greens Marketing Agreement (LGMA), as well as individual buyer requirements. Compost can have many benefits; at the same time, the potential food safety implications of compost and composting operations should be considered for nearby agricultural operations. For example, the LGMA identifies the following “Compost Risk Factors: Distance, timing of production, production process, volume of production, topography, water runoff, wind direction, history.” The LGMA metrics continue to evolve and currently include an assessment of composting within 400 feet, although these distances have changed over time. We ask that the composting provisions consider food safety implications on nearby food crops if this activity moves forward. Additional information on composting and food safety can be found here:

16-2  
cont'd

<https://www.fda.gov/food/food-safety-modernization-act-fsma/frequently-asked-questions-fsma>

[https://lgmentech.com/wp-content/uploads/2020/08/Current-version\\_August-2021-CA-LGMA-Metrics\\_FINAL-v20210818-clean-1262021.pdf](https://lgmentech.com/wp-content/uploads/2020/08/Current-version_August-2021-CA-LGMA-Metrics_FINAL-v20210818-clean-1262021.pdf)

3. Finally, we particularly encourage the County to facilitate agricultural product preparation and processing. These are important opportunities to make local agriculture viable and diverse and retain local value.

16-3

Thank you for your consideration of these comments and efforts to further promote the strength and resilience of agriculture in Santa Barbara County.

Sincerely,



Claire Wineman  
President

**From:** [Rob Barnett](#)  
**To:** [Harris, Julie](#)  
**Subject:** Written comments on Ag Enterprise Ordinance  
**Date:** Tuesday, December 21, 2021 1:20:21 PM  
**Attachments:** [image001.png](#)  
[CB-CVFAN-letter.pdf](#)  
[CVFAN Letter of Support Agricultural Enterprise Ordinance.pdf](#)

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**Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.**

Hello Julie, I am emailing you with some written comments by members of our Cuyama Valley Food Action Network. Please see the attached PDF letters from both the CVFAN and one CVFAN member the Cuyama Buckhorn, and additional comments from another member written below. Thank you for your effort making this a collaborative development. The pattern of this process bodes very well for private and public collaboration in Santa Barbara and the central coast I think.

Recent comments relayed through me from Lisa Haslett

"Rural Recreational Uses: Campground

1. Why is there a maximum length of 25' for an RV/trailer? Most people I know that own RV's have one longer. What is the purpose of limiting size?

I believe the size restrictions for each State and National Park vary and it is due to the individual road and site conditions. If an individual property owner arranged for adequate site space, turnarounds and fire truck access then why should there be a size limit? I recommend that there not be a size limitation.

17-1

2. Please clarify the meaning of 'No more than 50% of total campsites may host RVs/trailers/yurts/tent cabin at one time'. What if a group of vintage RV/trailer owners wishes to camp, would the property owner only be able to host on 5 sites instead of all 10? What is the purpose for this statement? I recommend removing this statement from the ordinance. "

17-2

Thanks again and happy safe holidays to you Julie,

**Rob Barnett**

Food Action Coordinator

**BLUE SKY CENTER**

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December 21, 2021

Julie Harris, Project Manager  
Planning and Development Department  
123 E. Anapamu St.  
Santa Barbara, CA 93101  
via email: [jharris@countyofsb.org](mailto:jharris@countyofsb.org)

RE: Agriculture Enterprise Ordinance Scoping Comments

Dear Ms. Harris:

Thank you for the opportunity to review and comment on the Notice of Preparation of the Environmental Impact Report for the Agricultural Enterprise Ordinance scoping document. Following attendance at the December 6th scoping hearing, I am submitting the following comments:

**General Comments:**

At the December 6th scoping hearing it became apparent that several other attendees have been involved with a working group for over three years to define and provide flexibility for activities in this ordinance with the intent to enhance the ability of farmers and ranchers to expand their business activities and keep their farms/ranches economically viable. I would encourage staff to re-examine submittals and discussions of that working group and to consider their recommendations and proposals in the revised project description for the Ordinance.

18-1

Neighborhood compatibility is paramount, especially where new uses may be allowed at or near the urban/rural interface (i.e., between the City of Buellton and agricultural lands; The 246 corridor between Alamo Pintado Road and Refugio Road - AG II and 1-E-1 Zoning interface). Noise, lighting, crowds near the urban interface represent potential conflicts to otherwise quiet, semi-urban neighborhoods.

18-2

The Santa Ynez Valley is defined to this day for its equestrian heritage. One only must look to the local Chambers of Commerce tourism websites and brochures to see equestrian activities and industry are alive and well and are being actively promoted as an economic driver here in the Valley. The equestrian industry (breeding, racing, sales, showing) and recreation trail riding are prevalent here as no other place in the County. It is important to acknowledge that wherever the term RURAL is used, EQUESTRIAN uses need to be considered and included in any decisions for facilities, transportation (right-of-way) corridors, safety, etc.

18-3

**Scoping Documents:**

The following are comments specific to the scoping documents:

Page 6, Section 3.4.1 - Agriculture Enterprise Uses: The uses should include Horse Boarding. Facilities to board horses have been driven out of Santa Barbara over the years due to escalating real estate prices and associated urban encroachment. More equestrians are looking to the Santa Ynez Valley for available and affordable boarding for their animals. It is a badly needed service throughout the County.

18-4

Page 9, Section 4.2.4 - Biological Resources. Please include an assessment of wildlife migration corridor impacts.

18-5

Page 12, Section 4.2.12 - Transportation (and all issue areas). Include EQUESTRIAN uses in the sentence "The rural roads also serve a variety of land uses, including agricultural (horse trailers, tractors, etc.), recreational (EQUESTRIANS, cyclists) and rural residential use."

18-6

Table 1:

**Campground (small-scale)** - The description should include equestrian (horse) camping as a use and be re-written to accommodate horse camping and vehicle requirements in the 3-tier criteria.

18-7

Under the ZC or LUP CDP:

1. The maximum length of allowed RVs/trailers cited in the restrictions (currently 25 feet maximum) would not accommodate larger Living Quarters (horse camping) horse trailers. If the trailer length is regulated, it needs to be increased to a minimum of 40 feet, to allow equitable use of the campgrounds by all recreational users, including equestrians who will bring their personal horses to area ranches to camp and for activities. FYI- an example of living quarters horse trailers can be viewed at <https://trailswesttrailers.com/trailers/living-quarters/>

18-8

Also, why regulate trailer length at all - what's the purpose? Practically, it is unenforceable as there is no County staff to monitor campers – especially on weekends. Usually, trailer length restrictions are up to the campground's managing jurisdiction or business owner.

2. The purpose of the statement "No more than 50% of total campsites may host RVs/trailers/yurts/tent cabins at one time" is unclear. Does it limit camping to 1/2 of the campsites at one time? Why is this a requirement? Please clarify and note that this measure may also be unenforceable.

18-9

3. Many equestrians (and other recreational RVers too) are now full-time campers (full-timers), so suggest extending the maximum stay to 30 days.

18-10

**Educational Experience or Opportunity** - Include equestrian clinics/activities/barn tours. These provide excellent educational opportunities to increase equestrian knowledge and skills.

18-11

Include equestrian clinics/activities/barn tours as Exempt.

Under the ZC or LUP CDP,

For permitting, 24 times/year for exempt and ZC/LUP seems excessive. Suggest 8 times per year for Exempt, 12 times/year with ZC/LUP, consistent with the Small-Scale Events category.

18-11  
cont'd

**Horseback Riding** - For Exempt and ZC/LUP, suggest the maximum trail riding participants be increased to 24. This equals three trail rides per day (morning, noon, and afternoon) with a maximum of eight trail riders. Note that there may be one or more guides that accompany the trail riders.

18-12

**Incidental Food Service** - Outdoor BBQs are common in the Santa Ynez Valley and should be included under the EXEMPT category. Often BBQ services are money-makers for non-profit, community service organizations. The community service organizations often carry their own permits from Environmental Health and train their food worker volunteers. The burden of permitting for such events is unnecessary and detracts from the good work our community service organizations do in the rural areas of the County, especially during the pandemic.

18-13

Again, thank you for the opportunity to comment. I look forward to reviewing the revised project description and would appreciate an additional opportunity to comment. I also request that the Ordinance have the benefit of a Planning Commission hearing so commissioners can utilize their expertise with Environmental Impact Reports and the public can comment on the final scoping draft.

18-14

Best Regards,

Kathleen Rosenthal  
Solvang, CA



December 21, 2021

Dear County Planning and Development,

Thank you for your service to the residents and businesses of Santa Barbara County. We appreciate your willingness to listen to the needs of family-owned, local businesses like ours as we partner together to achieve our collective goal of increasing economic and cultural opportunities in Santa Barbara County.

We would like to express our support for enacting amendments to the existing “Farmstay Ordinance” for Agriculture-II Zoned Areas throughout Santa Barbara County. In addition to creating revenue opportunities for small businesses struggling with the realities of a new macroeconomic environment, these changes will substantially increase County tax revenue, provide educational and enriching experiences to locals and visitors alike, and enhance our region’s reputation as a world-class destination to visit.

To the latter point, despite Santa Ynez Valley recently being named by Travel & Leisure magazine as one of the world’s “Top 50 Best Places to Travel in 2022” and Santa Barbara County being named 2021 “Wine Region of the Year” by Wine Enthusiast magazine, our area ranks 14<sup>th</sup> out of fifteen California wine regions for visitation. In addition to tasting world-class wines, visitors to wine country also crave the unique vineyard lifestyle experiences that are currently prohibited by Santa Barbara County regulations.

Please consider the following changes to the Farmstay Ordinance that we believe will enable Santa Barbara County vineyards and other agricultural businesses to better compete with our counterparts in Napa Valley, Paso Robles, and beyond.

1. **Overnight Experiences:** The most important change needed to the County’s current regulations is to allow overnight experiences on agricultural and farm lands, thereby reversing the detrimental effect of the Short Term Rental Ordinance that went into effect on October 1, 2018. While the ordinance may make sense in more populated areas such as the City of Santa Barbara, it should not apply in the mostly rural, agricultural areas of the County. Visitors to Santa Barbara County want to have the option to escape the “city life” and experience the open land, culture, and history of local farms and ranches. By prohibiting these vineyard lifestyle experiences that are available in other counties, Santa

6-1

Sunstone Winery ~ 125 Refugio Road, Santa Ynez, CA 93460 ~ 805-688-9463

[www.sunstonewinery.com](http://www.sunstonewinery.com)

Barbara County businesses and property owners lose valuable revenue that can help sustain their businesses that are increasingly in a precarious position due to the increasing costs of labor, insurance, taxes, and raw materials, and the ongoing impact of the COVID-19 pandemic. Allowing short term rentals in agricultural areas and allowing businesses to market these experiences on Airbnb or VRBO will ensure the viability of these businesses while delivering much needed funding to the County's tax coffers.

6-1  
cont'd

2. **RV Experiences:** RVs are the latest trend in travel due to the COVID-19 pandemic, as they provide an opportunity for people to continue to enjoy vacations with their families while still adhering to social distancing, which will likely be around in some form for the foreseeable future. Permitting overnight RV stays on agricultural and farm lands will create low-investment revenue opportunities directly to the landowner who may rent the space on a short term basis, as well as indirectly to the community at large through an increase in tourism. Overnight RV stays will provide visitors with the unique opportunity to experience a farm lifestyle with a minimal impact on the land. The fact that agricultural lands are large parcels means that these RVs can be parked on private properties out of sight and mind from neighbors and passersby.
3. **Serving Food Onsite:** An additional important change we are requesting is to allow vineyards and other agricultural businesses to prepare and serve food on their premises, similar to any other restaurant, retail store, or event venue in the County. Visitors to our area want to be able to go directly to the source for wine-and-food-pairing and farm-to-table experiences but do not have this option under current County regulations. In our case, we have existing infrastructure already built in and ready to be permitted but cannot take advantage of this potential \$250,000 revenue opportunity. Instead, left with no alternative, we contract for a third-party food truck to park on our property to serve our patrons. Lifting these restrictions will put wineries, vineyards, and farms on even footing not only with similar businesses in other regions but with restaurants and other food service establishments in our own region.
4. **Event Allowance:** The final change we believe would be a "game changer" for agricultural businesses in our County is to uncap limits on larger events such as food festivals, music festivals, operas, and similar events, which are currently limited in size, scope, and frequency. In addition to creating revenue opportunities for our businesses, this change would add immeasurable benefits to the community by providing access to amenities now available only in other counties. Santa Barbara County residents will no longer need to travel and spend their money in other places but rather be able to enjoy world-class amenities and experiences right here at home.

6-2

6-3

6-4

We wholeheartedly believe these proposed changes and this overall holistic strategy will be a win-win for all stakeholders in the County- hotels, restaurants, small business owners, residents, families, visitors, property owners, and taxpayers. The old adage "a rising tide lifts all boats" could not be more apropos in this situation.

Your task in balancing the many needs of our community is a difficult one, but we believe that working together and implementing these changes will benefit our entire County in countless ways. Thank you again for your commitment to the people of Santa Barbara County, and for supporting this initiative to ensure a strong, competitive local economy in the 21st century.

Sincerely,

Teddy & Djamila Cabugos  
on behalf of Sunstone Winery

**From:** [Meagan Robinson](#)  
**To:** [Harris, Julie](#)  
**Cc:** [Chip Wullbrandt](#)  
**Subject:** Comments to County Notice of Preparation and Scoping for Agricultural Enterprise Ordinance: Suggestions for Expanded Project Description  
**Date:** Wednesday, January 5, 2022 4:17:37 PM  
**Attachments:** [AG Enterprise-Email from Tyler Thomas.docx](#)  
[Farm Stay Work Group v2.docx](#)

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**Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.**

Please see the following email from Chip Wullbrandt:

Hello Julie,

Thank you very much for the opportunity to provide my below comments concerning the Agricultural Enterprise Ordinance. As I understand, the Project Description from the November 22, 2021 Notice of Preparation (NOP) is being revised and a new NOP is being circulated, but as I said in my voicemail message and as I have offered to Lisa Plowman, I would like to work more effectively with you all through that process.

As I think you may know, I have been working for approximately 3 years as a member of an informal advisory group made up of representatives from all sectors of agriculture here in Santa Barbara County, including the Vintners' Association, Cattlemen's Association, berry and row crop farmers and others; a representative from the Chumash; representatives from the hospitality and tourism industries, including Visit Santa Ynez Valley; trail, environmental and community planning interests, including WEWatch; and other knowledgeable and interested "stakeholders", all in an effort to provide a meaningful review of and recommendations concerning updates to the County's Inland Area Agricultural Zoning Ordinance in alignment with the general project initiated by the Board of Supervisors. Those efforts, which have been loosely coordinated with Third District Planning Commissioner John Parke, have focused on revisions and allowances for Agriculturally zoned lands which will provide meaningful income opportunities to help support and retain primary agricultural uses, at a level and in fashions that will actually be economically attractive for landowners (truly meaningful enterprises), and that can be implemented in a fashion consistent with the community's desire to protect, preserve and enhance agriculture and the environment. As the group includes a large contingent representing interests within the Santa Ynez Community Plan Area, we have also focused on opportunities consistent with Santa Ynez Community Plan LUA-4, which requires that the County shall support expansion of Agricultural Tourism. While that provision has been in the Santa Ynez Community Plan for over a decade, the Agricultural Enterprise Ordinance is really the first opportunity for the County to implement that requirement to support expansion of Agricultural Tourism.

Our work group was originally called the "Farm Stay Work Group" but last year we changed the name of the group to the **Agricultural Enterprise Work Group, in part with the hope to more meaningfully work with you and others in Planning and Development on this project.** I also serve on the Vintners' Association Advocacy Committee, which is chaired by Tyler Thomas. That Vintners'

Association Committee has also previously provided the County a written proposal for balanced expansion of agricultural tourism and incidental food service and other incidental activities in a fashion and at a level which has proven over the past 2 years to actually work for our industry and visitors, and which has resulted in no reported complaints from the community.

Unfortunately, through our various efforts we have felt frustrated and clearly have not effectively interfaced with Long Range Planning Staff. As noted in the attached email from Tyler Thomas, while he serves on the County’s formal Agricultural Advisory Committee, he does not believe that group has had the opportunity to provide effective input. From the presentation provided by Long Range Planning relative to the Notice of Preparation, it seems the effort has instead been mostly informed by other County Departments and by a public outreach survey in March 2021, with response from 137 people with an unknown level of knowledge or experience, and from “three virtual public workshops”.

We very much appreciate the challenge of implementing this broad effort under the challenges with COVID, but without getting caught up in looking back we would instead like to figure out how we can all work together. In addition to providing these comments I would like to propose and am happy to work with you to coordinate one or more meaningful work sessions with Planning and Development and our Agricultural Enterprise Ordinance Work Group as you revise the Project Description. Our group is knowledgeable, focused, respectful, and represents thousands of interested County constituents and visitors. My main request is that we be able to spend more than three minutes each in an interactive discussion with County staff, and provide input on details of the County proposed Project Description with the goal to develop something useful and meaningful.

In hopeful anticipation of improving this effort, my general comments to the Notice of Preparation and Scoping document are that the project description is written too narrowly and must be broadened, particularly as follows:

1) All allowances should be scalable based on property/premises size. What may be problematic on a 40 acre parcel/premises may be no problem on 100 acre or larger parcels or even larger premises. There should also be the flexibility (as with typical, historic ranch development with headquarters sites) to allow clustering on premises with more than 1 parcel.

20-1

2) There are a number of specific “pre-mitigation” type limitations on Small campgrounds and “glamping” which we think are overly restrictive, particularly at the EIR Scoping stage. There should be allowance for larger trailer units, as the current length would not even accommodate a typical living quarters horse trailer. There should be allowance for a greater number of glamping units, particularly on larger parcels, and greater flexibility for “park unit or yurt” equivalents such as small cottage type units built to fit with the agricultural aesthetic and natural environment of particular agricultural properties.

20-2

3) Limiting the number of camping/glamping units which may be provided by the landowner to a level less than the total number of camp sites makes no sense. In many circumstances, having owner provided units will be less impactful than having visitors haul in trailers, recreational vehicles or other forms of camping, and can be better designed to the details and

20-3

aesthetic of a particular farming operation.

4) There needs to be more flexibility for incidental food service, particularly at wineries, where the service of food is a complementary activity for enjoyment (and so sale) of wine. Many wineries already have approved commercial kitchens, and the service of food incidental to the service and sale of wine has proven very appropriate and without complaint during the COVID based emergency. We urged that the County focus on a definition of “incidental” (such as we provided with the here enclosed meeting notes of our work group June 29, 2021 meeting), and leave the more restrictive details (such as limitation to pre-packaged food, outdoor bbqs or food trucks in the project description to the Health Department and its implementation of potentially evolving State Regulation.

20-4

5) Increase in the minimum size of exempt activities such as educational tours, horse back tours, and winemaker and farm to table dinners, with a minimum exempt size of at least the 80 visitor threshold which is not a “winery special event” under the definitions in the Winery Ordinance; and

20-5

6) Defer to the EIR mitigation measures such as further development standards, which may then be considered by the Planning Commission and Board of Supervisors.

20-6

Finally, I have attached a copy of the detailed June 29, 2021 meeting notes of the “Farm Stay Work Group” which provided succinct comments and proposed language for most of these same issues, and a December 14, 2021 email from Tyler Thomas with bullet comment points on many of these subjects and on the process.

Again, please let me reiterate that our hope is to work cooperatively and effectively with Long Range Planning. Please let me know how I may help with that goal.

Thank you,

Chip Wullbrandt



**PRICE, POSTEL & PARMA LLP**

Meagan Robinson  
Secretary to Ian M. Fisher, Kristen M.R. Blabey and  
Chip E. Wullbrandt  
Price, Postel & Parma LLP  
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**From:** Tyler Thomas <[tyler@dierbergvineyard.com](mailto:tyler@dierbergvineyard.com)>  
**Date:** December 14, 2021 at 4:48:29 PM PST  
**To:** Chip Wullbrandt <[cwullbrandt@ppplaw.com](mailto:cwullbrandt@ppplaw.com)>  
**Cc:** Matthew Bieszard <[matthew@gleasonfamilyvineyards.com](mailto:matthew@gleasonfamilyvineyards.com)>, Alison Laslett <[alison@sbcountywines.com](mailto:alison@sbcountywines.com)>, John Parke <[jhparke@icloud.com](mailto:jhparke@icloud.com)>  
**Subject: Re: AG Enterprise**

Chip,

As suggested I'll provide a few comments here.

For P&D - I realize we are now at a point of the draft EIR and that comments should be oriented toward that process, however it is difficult to avoid comment on the draft ordinance and its general process of creation which will be obvious below. Furthermore, it seems odd to me, ignorant as I am about how government actually functions, that an ordinance that falls within the purview of P&D Commissioners would go to an EIR prior to receiving comment from the very commissioners who will be involved on approving the plan, and deciding on projects. I digress.

- Instead of primarily surveying the population, wouldn't it be better to visit with, inquire of, and determine from the constituents for whom the ordinance is being written to benefit in order to determine what level of business is actually beneficial for supplemental income? I would love to see P&D set up reasonable targets based on feedback for what actually constitutes enough income to even be supplemental. This will allow the staff to place into context whether or not suggested limitations will even come close to offering a benefit. 20-7
- Related to the first point: it seems an ordinance ought to start more broadly, to potentially allow for maximum benefit, and then have the EIR process tamp down any areas where we believe an impact may occur that is not worth the benefit or reward achieved. It seems the opposite has occurred.
- I am all about data and numbers and do think P&D should poll citizens to get feedback on how to draft something like this ordinance. However 137 people is a far cry from a significant sample size and the data should have been viewed, as a result, with suspicion. Citizens > 18 years of age represent about 348,000 residents in Santa Barbara. P&D used 137 people or 0.039% of the population to drive - it seems to me - a large share of the feedback. I would like to see a greater understanding of how little statistical power this has, and therefore weight the impact of this data appropriately (ie, not very strongly). 20-7  
cont'd
- I think the P&D planners (not necessarily referring to Lisa or Dan here) need to do a better job with the AAC on sequestering feedback. Much of the info we receive is difficult for us to contextualize quickly (we have other lives/jobs) and we need better facilitating to draw out feedback and data. Making a relatively short presentation and then saying "we're looking for your feedback" does not seem to garner the feedback P&D desires to help P&D do their jobs well. Then Ag members see a written ordinance and wonder how we got there even though 2 meetings with AAC are listed. Some small examples that might help instead of "do you have any feedback?": 20-8
  - What do you think is a reasonable revenue amount that would constitute supplemental income for an agriculture entity and do these initial outlines offer enough business opportunity to get there?

- What current constraints do you have that limit your ability to increase your income and is there something you see within this ordinance that could alleviate that constraint?
- Do you see any redundancy within this ordinance and a LUP or CUP you may already have that suggest we should leave it out of this ordinance?
- In the areas being analyzed for the EIR, if no increase in - e.g noise or pollution - is thought to be incurred, can P&D consider increasing thresholds or, perhaps, will the EIR determine where the threshold exists that would cause an impact? Should we build the ordinance to approach the threshold to maximize its purpose and benefit where it has no known EI? 20-9
- Per the previous note: wineries are already allowed gatherings of up to 80 people in most tiers without any permit and could do so as frequently as they like. Why would farm to table meals, or other educational gatherings be limited to less than 80 and less than several a month? Aren't we already aware there is no impact since this is already in place and has already passed through an EIR? 20-4  
cont'd

That's all I have at the moment. Hope this helps and you can read it or do whatever you like with it. I didn't get to really camp out in the ordinance language or EIR draft to be more compelling. Be well and good luck. Tell Lisa hello for me and I'm sorry to miss her!

Tyler

--

Tyler Thomas  
Star Lane • Dierberg Vineyards  
President • Winemaker  
805.697.1454 (winery direct)  
805.245.3484  
"Keep fermenting" - Someone

Farm Stay Work Group  
June 29, 2021 Meeting Notes

1. Allow Food Service Incidental to AG Enterprise

- A. Emergency COVID-19 Rule: Prohibitions on selling food at wineries was superseded by ABC Emergency regulations that Winery tasting rooms could be operated as a Restaurant bone fide eating place/Type 47 license with EHS certification, \$99 temporary license and partnership with restaurant, caterers or have an approved commercial kitchen. Board of Supervisors waived conditions in land use permits to so allow Tasting Rooms to open with such incidental food service. This has worked very well.
- B. Proposed Rule: Allow “incidental” food service for AG enterprise uses and facilities. Incidental does not include commercial facilities open to the general public who are not using the recreational activity, commercial facility, winery, farm or farm stay (see similar language in Development Standards for Rural Recreation- 35.42.240.C.1.c).

2. Farm To Table and similar events-

- a. Definition for Farm to Table events: use of Ag zoned property for activity focused on food, wine or other agricultural products that has been substantially produced or grown on the property or in the County or in the Region where the food/agricultural product is served
- b. Follow structure in Winery permit tiers, development standards, setbacks and special event requirements (see 35.42.280 and in particular D.8,) and also provide definition for AG Enterprise Events consistent with Winery Special Events in LUDC Glossary:
  - i. Per definition, event attended by less than 80 people is exempt
  - ii. Tier I—4 events/year of 150 persons each allowed with LUP (maybe should allow for scalable increase based on acreage of subject premises)

- iii. Tier II—8 events/year of 150 persons each allowed with Zoning Administrator approval (again maybe scalable for larger parcels)
- iv. Tier III—12 events/year of 200 persons each with Planning Commission (“PC”) approved development plan (again limit maybe scalable for larger properties)
- v. Tier III+—40 events/year with case by case approval by PC with CUP

- c. Consider “scalability” to allow more/larger events with increased parcel size and impact mitigation/avoidance.

20-1  
cont'd

### 3. Glamping

- a. Gaviota Plan: campground language very limiting and complicated. Seems to allow 20 camping spaces per 40 acres
- b. Inland area: should allow all forms of camping, yurts, airstreams, Recreational vehicles, etc, subject to Land Use Clearance to confirm size, setbacks, development standard compliance (look to provisions for Temporary Uses in LUDC but with one time, one stop sign off):
  - 10 units per 40 acres increasing up to 30 units for 120 acres or more per parcel
  - exempt from permitting so long as meet development standards
    - i. Set backs
    - ii. Rural Character
    - iii. Not interfere with Agriculture
    - iv. No expansion or urban services
    - v. Fire dept. approval
    - vi. Waste disposal approved by EHS (try to use alternative waste disposal such as composting)

- 4. Other Low Intensity Recreation: relatively small activities that should require limited/no permitting on large parcels. Basically a downshift of CUP requirement for Rural Recreation under 35.42.240, with level of exempt, LUP od CZ only approval scalable to property size, similar to Glamping and Farm to Table event discussion above.

20-5  
cont'd

- a. Recreational camps

- b. Small Guest Ranch and retreats
  - c. Hunting
  - d. Fishing
  - e. Shooting ranges
  - f. Farm tours
  - g. etc
5. Events/activities modest in Size and Incidental to exempt or otherwise Permitted Facilities/Activities should be clearly exempt/no LUP-
- a. hunting/skeet/target shooting
  - b. painting
  - c. fishing
  - d. wagon/hay rides
  - e. horseback riding
  - f. bird watching
  - g. night sky viewing
  - h. school tours
  - i. yoga/meditation
  - j. air balloons
  - k. picnicking
  - l. e-bike/ATV tours
  - m. running

20-5  
cont'd

Note- Overall approach for AG Enterprise and Farm Stay concepts need to be that the allowed uses are actually practical and provide economic value at a level that property owners will actually implement and follow County guidelines, rather than just do “under the table” because County requirements too restrictive and not reality based.

**From:** [Nancy Black](#)  
**To:** [Harris, Julie](#)  
**Subject:** In support of the Ag Enterprise Ordinance EIR  
**Date:** Tuesday, March 8, 2022 11:19:34 AM

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**Caution:** This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

I'm writing to support the EIR for a revised project description for the Agricultural Enterprise Ordinance project to allow a variety of uses on land zoned AG-II.

21-1

I think it's vital to allow local farmers and ranchers to pursue incidental and compatible agricultural enterprises that support their existing agricultural operations. Given the low profit margins for ag, and inherent unpredictability, given climate change, we must support our local farmers to be able to continue to provide local food, as well as to support their ranches and farms to remain agricultural lands. From a land conservation perspective, this allows ranches to afford to continue in agriculture, rather than selling to developers.

SB County needs to reinforce and strengthen our local food system, which is beset by an unsustainable reality: that most food grown in the county leaves, and most food consumed in the county comes from elsewhere. Allowing farmstays, food service, produce stands, classes and events to occur on ranches and farms provides additional income sources to maintain and strengthen our local food system and providers.

Thank you,  
Nancy

**Nancy Black**  
Cofounder, [Producer](#), Storyteller



405 Santa Anita Rd, Santa Barbara, CA 93105  
cell 805-455-1762 | office 805-569-1559  
Connect on [Facebook](#) | [Twitter](#) | [LinkedIn](#) | [Instagram](#)  
[nancy@mercurypress.com](mailto:nancy@mercurypress.com) | [mercurypress.com](http://mercurypress.com)

**From:** [Ed Seaman](#)  
**To:** [Harris, Julie](#)  
**Cc:** [John Parke](#)  
**Subject:** Agricultural Enterprise Ordinance  
**Date:** Friday, April 1, 2022 11:57:00 AM

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**Caution:** This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Hey Julie,

Hope you are doing well.

John Parke went over the Ag Enterprise Ordinance in some detail with about a dozen landowners/ranchers/farmers on March 24th and I had a couple of comments to share. Hopeful the others in the meeting will do the same. John has built a thoughtful group.

#### EDUCATIONAL EXPERIENCE OR OPPORTUNITY

Why limit the Exempt and ZC Small Guided Tours to 15 attendees each? We have had as many as 40 comfortably in and around our pretty standard-sized barn and big oak tree for our Worm Farm field days, and we could easily host 60. I have led as many as 60 guests on one Tarantula Trails nature hike- I feel completely comfortable with only one helper to pull up the rear so as not to lose children in the poison oak. We have grown from 20 guests on 1 Tarantula Trails hike in 2017 to a little less than 1,000 guests for our Tarantula and Toad hikes, mostly young families, in 2021. We use the same trails and ponds every year and our humanity footprint is light, we are in and out in a couple of hours. Although Restoration Oaks Ranch is 955 acres, these activities actually only occur on a thin 1/2 mile path between the barn and our oak planting site 1. Our nature hikes are 1,000 times larger in 2022 than they were in 2017, and our impact on the ecosystem is almost entirely the same.

There is definitely a desire to connect to the environment in a fun, educational way, and we shouldn't be the only private ranch or farm doing it. I would love it if more ranches and farms would imagine public educational activities around wildland farming/ranching like we do, using the ecosystem's flora and fauna as the ambassadors to agroecology concepts. It would be better if it was easy for them.

After having said all that, for the Exempt and ZC tours, a maximum of 15 persons per guided tour seems too small, and Attendees Max by Acre and Annual Maximum Attendance seem impractical as a management strategy.

From a practical standpoint, guided tours on both big and small properties would need to be systematized, meaning a similar annual pattern. If you take the Chamberlain Ranch as an example, they have 8,000 acres of mostly oak savannas and run cattle, but if they chose to host guided tours to discuss the relationship between cattle, healthy soils, carbon sequestration and water retention, they would certainly not open up all 8,000 acres to tours. Conversely, a small ranch of even less than 20 acres would not open up all their land, either. Every landowner and operator would need to find a pattern that fits the purpose of the tour, and it would be a manageable, repeatable activity. Acreage doesn't seem to be the right way to manage this. I'm up for a brainstorming conversation. Perhaps parking availability per event?

## SMALL SCALE EVENTS

My wedding had 300 guests (My wife was very popular. I bummed out many young men when she agreed to marry me). I asked everyone at our Ag Enterprise meeting how many had a wedding of less than 50 guests. Nobody did.

I started thinking about any kind of money-making event that charged for attendance. Hard to generate revenue or to just break-even at 50 count for any event that requires outsourcing, materials or additional labor. (50 tickets at \$50 per is only \$2,500). If one of the purposes of the Agriculture Enterprise Ordinance is to expand the revenue-generating possibilities on Ag land, the attendees number needs to be much higher at the lowest level of Exempt or ZC, or it doesn't serve this purpose.

Like the Educational Experience category, acreage doesn't seem to be a logical way to manage events. Churches don't use much acreage, and much of their acreage is parking lot. As a non-zoning, purely practical matter, there is unlimited precedent for weddings and events like them with a lot more people in a lot less space.

22-2

Also like the Education Experience category, limiting the number of days per month or days per year isn't practical. Maybe even less practical because most outdoor events would be seasonal, like the hospitality industry, which means the spring and summer months would have much more interest than the winter months. If a landowner or operator were to want to commit to events, they would want to be confident in their ability to scale. It will cost time and money and life-energy to prepare for events. The vision needs to include profitability, ceilings on attendance that are too low will be a significant disincentive. Just sayin'...

## COMPOSTING

Thank you! The only thing I would ask you to consider is to link the county ordinance to the State changes to composting and vermicomposting. The associates I talk to in Sacramento say composting and vermicomposting will open up rapidly over the next few years in an attempt to get more people and businesses to engage with recycling green waste.

This means the maximum feedstock and compost that can be held on-site (<751 square feet) and the amount that can be given away and sold (1K cubic yards) will likely be increased, and it would be great if Santa Barbara were able to immediately update their ordinance to match the new laws at the state level when they do open up, instead of going through this whole Agriculture Ordinance thing again.

22-3

Thanks again, Julie.

- Ed Seaman  
805-868-0329

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

**From:** [sharyne\\_merritt](#)  
**To:** [Harris, Julie](#)  
**Subject:** Agricultural Enterprise Ordinance  
**Date:** Sunday, April 3, 2022 5:58:56 PM

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**Caution:** This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Ms. Harris,

I wish to register my strong objection to commercial hunting being added to the Ag Enterprise Ordinance and urge you to eliminate it and go back to the earlier draft permitting fishing only.

23-1

First, as you can guess bullets travel far - not a sports person myself, I did a quick search and found that a popular hunting bullet, the .308 Winchester has a range of over 1000 yards before it starts dropping = 3,000 feet = over 1/2 mile ([https://en.wikipedia.org/wiki/.308\\_Winchester](https://en.wikipedia.org/wiki/.308_Winchester)). These bullets could easily leave most AGII properties endangering people who live and work on adjacent properties. A square 100 acre parcel would be 2,100 feet x 2,100 so a bullet could easily come 1000 feet into the adjacent property. Why would we want farmers to make extra money by having 20+ people endangering the farmer's neighbors? Yes, the farmer would be liable, but the neighbor or a member of their staff could be dead.

Second, to the best of my knowledge, there was not a groundswell of support for this option. This was apparently added to the ordinance after one member of the Agricultural Advisory Committee suggested it. It was not voted on or supported by any other member of the AAC.

Third, farmers can already shoot on their property. Adding this to the Ag Enterprise Ordinance is simply providing a way for landowners to make extra money by having strangers do something that endangers their neighbors.

If this is going to stay in the proposed ordinance, it must have major restrictions: allowed on properties of > 1,000 acres. No shooting within 3,000 feet of a parcel boundary (and flags marking the 3,000 foot limit). No bringing in animals to be hunted. Hunting only animals established by CDFA as "agricultural pests." Anyone who provides such a business gives up their right to a depredation permit that year.

23-1  
cont'd

If one person's request got this into the ordinance, I hope one person's request can get it out.

Thank you,  
Sharyne Merritt  
farmer  
Santa Rosa Rd

**From:** [Jay Ritterbeck](#)  
**To:** [Harris, Julie](#)  
**Cc:** [Greene, M](#); [Peter Imhof](#); [Ann Wells](#); [Jay Ritterbeck](#)  
**Subject:** Agricultural Enterprise Ordinance: Second Notice of Preparation and Revised Scoping Document – City of Goleta Comments  
**Date:** Monday, April 4, 2022 11:17:09 AM  
**Attachments:** [image001.png](#)  
[2022 4-4 COG Comment Letter No.2 - CoSB AEO.pdf](#)

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Good morning, Ms. Harris.

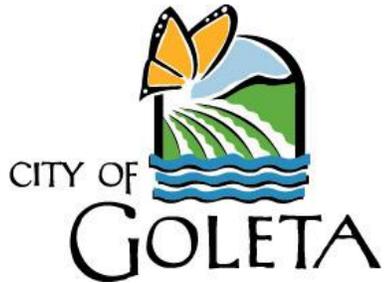
Attached to this email is a copy of the City of Goleta's comments as they relate to the recently released NOP and revised Scoping Document for the County Agricultural Enterprise Ordinance. If you have any questions, please do not hesitate to contact me.

Thank you.

J. Ritterbeck, Senior Planner



130 Cremona Drive, Suite B  
Goleta, CA 93117  
Ph# 805.961.7548  
Email: [jritterbeck@cityofgoleta.org](mailto:jritterbeck@cityofgoleta.org)



April 4, 2022

SENT VIA EMAIL

**CITY COUNCIL**

Paula Perotte  
*Mayor*

James Kyriaco  
*Mayor Pro Tempore*

Roger S. Aceves  
*Councilmember*

Stuart Kasdin  
*Councilmember*

Kyle Richards  
*Councilmember*

Julie Harris  
Project Manager  
County of Santa Barbara Planning and Development Department  
123 E. Anapamu Street  
Santa Barbara, CA 93101

**RE: Agricultural Enterprise Ordinance: Second Notice of Preparation and Revised Scoping Document – City of Goleta Comments**

**CITY MANAGER**  
Michelle Greene

Dear Ms. Harris:

Thank you for the opportunity to provide additional comments on the second Notice of Preparation (NOP) and revised Scoping Document for the County of Santa Barbara (County) Agricultural Enterprise Ordinance (AEO).

As noted in our first comment letter, dated December 17, 2021, the City of Goleta (City) regularly engages with County Department of Planning and Development staff to cooperatively resolve issues of concern associated with projects located within the County's jurisdiction, but which could result in negative effects and impacts to the City. After reviewing the NOP and revised Scoping Document for the project, which were released on March 8, 2022, City staff has identified additional concerns and potential deficiencies within a number of areas of review proposed and summarized within the Scoping Document. While nearly all of the comments from the City's first letter carry forward, after reviewing the revised document, we wish to add additional comments, as noted herein.

In general, the City supports activities on agricultural land, such as weddings, wineries, and other visitor-serving uses that support local tourism and make farms more economically viable. Making farms within

the unincorporated area more viable helps ensure that agricultural lands remain in cultivation with orchards and compatible crops and preserve an attractive greenbelt around Goleta.

However, the City also would like to ensure that potential, negative impacts related to the AEO project are fully analyzed and either eliminated or mitigated to levels that are less than significant. Based on our review of the revised Scoping Document, the City wishes to provide the following comments in an effort to help guide a more thorough and comprehensive review within the subsequent Environmental Impact Report (EIR) for the AEO project.

### Global Comments

Throughout the revised Scoping Document, there were numerous revisions made within the text that were not shown in strike-through/underline text. This omission makes it difficult to determine the full extent of changes and whether previous comments made concerning the first released Scoping Document had been addressed. Clear delineation of all revisions and transparency regarding the differences between the two documents are needed.

24-1

Additionally, throughout the Scoping Document, we suggest changing the term “structure” to “framework” when discussing the tiered permitting and thus reserve use of the term “structure” to actual physical development in order to eliminate potential confusion.

24-2  
(5-2)

In no instance should new and expanded AEO-related development be allowable on properties with illegal operations or ongoing zoning violations. Prior to any exemptions, issuance of Zoning Clearances (ZC), or approval of a Land Use Permit (LUP) or Coastal Development Permit (CDP), the County must ensure that the subject lot complies with all applicable Zoning Code regulations and policies for existing structures and land uses.

24-3  
(5-4)

The project should also make separate provision for agriculturally zoned lands that are located within the urban-rural interface around incorporated areas. These lands will have significantly different negative impacts than the same zoned lands located further from urban areas. As such, the City requests that a buffer of one mile be analyzed or considered as a project alternative for any AEO-related allowance for any proposed development. Within this buffer, no “low-level” [ministerial] permits should be available as an option for more intensive uses contemplated by the ordinance. Only discretionary Conditional Use Permits, which would require subsequent environmental review under the California Environmental Quality Act (CEQA), should be available in order to better evaluate the site-specific impacts. **Note:** As discussed later in this letter, LUP/CDP permit types are initially referred to in the NOP as “low-level” permits and later referred to as “discretionary.” Please correct or clarify this discrepancy within the EIR.

24-4  
(5-3)

The final global comment is that the document appears to be using CEQA Guidelines from an outdated source. The 2022 CEQA Guidelines Appendix G Environmental Checklist includes additional areas of environmental review that are not included in either the original or the revised Scoping Documents. Specifically, these documents omit the requisite analysis in the areas of Energy, Forestry, Mineral Resources, and Population/Housing.

24-5

### **Section 3.3 – Project Overview**

Please rename this section to “Project Objectives” so readers can more easily find the specific objectives, which are later referenced in the document in the Alternatives Analysis.

24-6

### **Subsection 4.2.1 – Aesthetic and Visual Resources**

This section must evaluate the impacts of new AEO-related uses for their impact on dark skies, as viewed from all public areas, including parks, trails, and roadways.

This section should discuss allowances and visual/aesthetic impacts of increased signage for the new AEO-related uses. Additionally, if such new uses are on lands within the urban-rural interface discussed earlier in this letter, off-site signage would likely be prohibited.

24-7

All new structural development within the urban-rural interface should require design review by the appropriate County Board of Architectural Review to ensure compatibility with the adjacent incorporated jurisdiction.

### **Subsection 4.2.3 – Air Quality and Greenhouse Gas Emission**

The subsequent EIR should provide detailed analysis of air quality as it relates to the potential release of hydrogen sulfide (H<sub>2</sub>S) gases, which are known to occur in the areas north and west of the City.

24-8

The EIR should also evaluate the annual Santa Ana winds and the effects they have on air quality (i.e., transport of dust and H<sub>2</sub>S) as they would relate to new and expanded agricultural enterprise activities.

### **Subsection 4.2.4 – Biological Resources**

The Scoping Document states that the EIR will “identify feasible mitigation measures necessary to reduce or avoid significant impacts” to biological resources. Mitigation measures can be incorporated into adopted regulation as development standards that would require a project to avoid any and all potential impacts or they can be incorporated into a project as a condition of approval in a mitigation monitoring program. However, CEQA does not allow a project to simply be conditioned into compliance with

24-9

the law. Any final action to adopt an AEO that includes either an exemption, an unappealable ZC, or other “low-level” ministerial permits (i.e., LUP, CDP) must only have these permit options available for development that would completely avoid any and all potential impacts, including cumulative impacts, on protected biological resources.

24-9  
cont'd

#### **Subsection 4.2.5 – Cultural & Tribal Cultural Resources**

The Scoping Document has combined these two separate CEQA issue areas into a single section and then seems to describe them as being merely an AB 52 issue. Historical resources and tribal cultural resources should be treated separately. Furthermore, even though this section covers two separate but related issues, it provides the least amount of context, just two sentences briefly explaining what and where these types of resources are and what types of AEO-related activities (e.g., grading, conversion of historic buildings, camping, etc.) could have adverse impacts on them. The County should ensure that the CEQA document contains a robust investigation and discussion of the cultural, tribal cultural, and paleontological resources that could be affected by these new activities, which go well beyond typical agricultural cultivation on rural AG-II lands.

24-10

#### **Subsection 4.2.7 – Hazards and Hazardous Materials**

The EIR must provide detailed analysis of increased public exposure to hazards and hazardous materials relating to the potential release of H<sub>2</sub>S gases, which are known to occur in the areas north and west of the City.

24-11

#### **Subsection 4.2.8 – Hydrology & Water Quality**

The EIR must also provide detailed analysis around hydrology and water quality as they relate to the potential release of H<sub>2</sub>S gases, which are known to coincide with water extraction in the areas north and west of the City.

The EIR must fully analyze and discuss the impacts to each of the water basins within the County. Of particular concern for the City are those water basins where the Goleta Water District has infrastructure and interests. These basins are vital to the City and any additional non-District extraction will result in less water availability throughout its service area.

24-12

The EIR should also analyze and discuss the impacts that continued, expanded, or intensified groundwater withdrawal could have on saltwater intrusion, land subsidence, flood inundation, and sea-level rise.

A robust discussion must be included in the EIR that analyzes water usage associated with each potential AEO-related use. Exemptions, unappealable ZCs, and other “low-level” ministerial permits (i.e., LUP, CDP) should only be available for AEO-related

development and uses that would not increase existing water use and completely avoid any and all potential impacts, including cumulative impacts, on protected water resources.

The County should also be certain that existing, permitted, agricultural water wells are not repurposed for potable use without the requisite review and permits. Similarly, any expanded AEO-related use that requires onsite wastewater management must also be analyzed on a case-by-case basis to ensure safe and controlled treatment or disposal.

24-12  
cont'd

#### **Subsection 4.2.9 – Land Use and Planning**

The EIR analysis needs to include review of the Transportation Element of the City's General Plan to determine whether potential changes and increases in vehicular movements affecting the City as a result of AEO-related uses are consistent with City policies, such as Level of Service standards.

The EIR analysis needs to also include review of the City's General Plan Visual and Historic Resources to determine whether the potential AEO-related uses would be consistent with City policies that protect scenic views from public viewing areas.

24-13

One of the stated goals of the AEO is to streamline permitting for various agricultural-related uses. A matrix should be developed that discloses the existing and proposed permit paths for each of the uses covered in the AEO. This matrix would be an important component in the required alternatives analysis to provide the substantial evidence needed in the "No Project" alternative.

#### **Subsection 4.2.10 – Noise**

The Scoping Document acknowledges that the new AEO-related uses have the potential to introduce new noise-generating uses that are not typical for agricultural areas. It was unclear from the document what particular "sensitive receptors" would be analyzed. It will be important for the EIR to analyze the effects of these new noise-generating uses not only on nearby biological habitats, but also to residential uses that would be able to hear the newly introduced noise generated by these new, non-typical uses.

Any final action to adopt an AEO that includes either an exemption, an unappealable ZC, or other "low-level" ministerial permits (i.e., LUP, CDP) must only have these permit options available for development that would not have any type of outdoor amplified sound system.

24-14

If new AEO-related activities would occur after dusk, the quiet night-time ambient levels should be analyzed. Also note that the typical southerly wind direction in the evening will further affect the distance noise would travel at night.

### **Subsection 4.2.11 – Public Services, Utilities, and Recreation**

As previously discussed, any new or expanded water usage within water basins used by public water districts should be analyzed to determine the potential impact to water availability to existing and future service customers of those districts.

As noted within the Scoping Document, an incremental increase in the use of local roadways would increase the need for more frequent road maintenance. The EIR should analyze and disclose the impacts and costs that would be incurred by incorporated areas and identify adequate mitigations.

24-15!

The EIR should discuss how increased AEO-related uses could introduce new or expanded recreational uses that conflict with existing recreational use, such as potential increases in equestrian use of hiking and biking trails (or vice versa) and whether new or expanded trails or bike paths would be needed to ensure safety. Note: The discussion within a “recreation” subsection would be vastly different than “public services and utilities” and should be analyzed separately on its own.

### **Subsection 4.2.12 – Transportation**

When analyzing Vehicle Miles Traveled (VMT), the EIR should be clear on the methodology that will be used and how it is applied to the project as a whole, or in separate parts. This is key since the County’s Environmental Thresholds and Guidelines Manual states that the VMT Calculator tool does not have the capability to analyze large, complex projects (such as this Countywide AEO project) and therefore it appears that the project would require a VMT Transportation Study, as detailed in subsection I (pgs. 182-183) of the current 2021 Thresholds Manual. However, if the AEO project only considered and reviewed VMT within the EIR in the context of case-by-case impacts, one could determine that the AEO-related uses could be screened out as “small projects” with less than significant impacts because each discrete use would likely generate fewer trips than the threshold of 110 average daily trips. As such, the cumulative impact of these new types of uses would likely be under-analyzed or simply overlooked.

24-16!

### **Subsection 4.2.14 – Cumulative Impacts**

Although briefly mentioned in subsection 4.2.12 (Transportation), the cumulative effects and impacts from having more than one AEO-related use on a single parcel should be thoroughly analyzed and discussed in the EIR.

Similarly, the EIR should provide some analysis and discussion of the methodology that would be used to monitor and determine the future point at which the density of AEO-related uses within an area would exceed one or more thresholds of significance. As currently written, it is unclear whether the County’s adopted Environmental Thresholds and Guidelines Manual, last revised and published in January 2021, will be used.

24-17!

### **Section 4.3 – Alternatives Analysis**

The Scoping Document states that the EIR will “programmatically describe the major characteristics and significant environmental effects of each alternative.” However, it is unclear what is meant by the use of the term “programmatically.” Is the County intending for the EIR to be developed and used as a Programmatic EIR? If so, please explain how site-specific CEQA analyses would occur.

As discussed above in the Land Use and Planning section, a matrix should be developed that discloses the existing and proposed permit paths for each of the uses covered in the AEO in order to provide the substantial evidence needed in the “No Project” alternative. The “No Project” alternative would not prohibit the AEO-related uses, it would instead require that those projects go through the existing permit path(s) for those types of non-typical accessory uses when proposed in the rural AG-II zones. Additionally, in those situations, case-by-case, site-specific analyses would occur for each proposed new use on each individual subject property, pursuant to CEQA §15126.6(e)(3)(A&C).

24-18!

The Alternatives Analysis section should cite Section 3.3 when referencing the basic objectives of the AEO project.

### **Section 5.0 – Description of Permit Types and Summary Table of Proposed Ordinance Amendments**

Within the text of this Section, the County states that a Planning Director-approved LUP and a CDP are both “discretionary zoning permits.” If this statement is correct, please explain what discretion applies to approval of these permit types. Also please state where the City can find the requisite CEQA documents (e.g., Notices of Exemption) associated with such County’s approvals. The County’s CEQA “EnvDocs” webpage does not currently appear to provide these documents.

24-19

#### **Table 5-2 – Summary of Proposed Ordinance Amendments**

In the heading of the table, the ZC permit type is grouped with the LUP and CDP. However, the ZC is a non-appeal ministerial permit, which is very different than a LUP and CDP. The table should separate the ZC into its own column, similar to how the “Exempt” category is shown, and at a minimum have this permit path only as an option for uses that exceed development thresholds that would qualify for an exemption, but upon staff review are found to completely avoid all protected resources and clearly do not create any potential for significant impacts identified in the EIR.

24-20  
(5-19)

### Table 5-2 – General Comments throughout the Table

Some use classifications indicate that the development would be exempt as long as “[n]o new structures” are being proposed that would otherwise need permits. However, not all use classifications for the Exempt column include this distinction.

Please clarify whether the intent of the exemption option would be reserved only for proposed AEO-related uses that would not require new structural development.

24-21!  
(5-20)

The EIR needs to also explain how mitigation measures would be applied to, monitored, and enforced upon AEO-related uses that would be classified as “exempt” from permits.

The footnoting throughout the table needs to be fixed since some reference numbers remain in the text of the table for footnotes that have been deleted.

### Table 5-2 – Campground

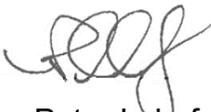
A final comment is offered with regard to the time limit of “30-day max stay” that is cited for campgrounds. This time limit is unclear since it does not include a temporal comparison, such as 30 days per month or per year. Furthermore, is this intended to apply only to “consecutive days” stayed or is it cumulative? Furthermore, is this time limit applicable per person, per family, per vehicle, or some other measure? Please clarify this within the draft EIR.

24-22!  
(5-21)

City staff thanks you again for this opportunity to comment on the NOP and Scoping Document. We appreciate the County’s efforts to support agriculture and agricultural resources and its dedication to protecting our other valuable and sensitive resources throughout Santa Barbara County.

City staff will be available for further discussions with the Project Manager and other County staff, if desired, to give additional context or clarification where needed, or any requested assistance with advance review of the draft EIR anywhere possible new regulations could directly or indirectly affect the City.

Sincerely,



Peter Imhof  
Director, Planning and Environmental Review Department

cc: Michelle Greene, City Manager  
Anne Wells, Advance Planning Manager  
J. Ritterbeck, Senior Planner

**From:** [Cindy Douglas](#)  
**To:** [Harris, Julie](#)  
**Subject:** Fw: Ag Enterprise Ordinance - Commercial Hunting on AG II  
**Date:** Monday, April 4, 2022 12:20:42 PM

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**Caution:** This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Ms. Harris,  
Commercial hunting being added to the Ag Enterprise Ordinance is a horrible idea for our area. I must protect my agricultural employees and there is not enough room for them and hunters in the Santa Ynez River area. We already have issues with illegal guns being discharged in the riverbed and around it. I wish this was Montana in the summertime, but it's not.

25-1

Thank you,  
Cindy Douglas, Farm Manager, 805 315 5303

**From:** [Mary Jane Edalatpour](#)  
**To:** [Harris, Julie](#)  
**Subject:** Agricultural Enterprise Ordinance  
**Date:** Monday, April 4, 2022 6:38:26 PM

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Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Ms Harris,

I strongly object to the inclusion of commercial hunting in this ordinance. And I strongly suggest you remove this endorsement of shooting.

26-1

I and two employees have had experiences with stray bullets whizzing dangerously close fired by unknown persons from off my land. It makes no sense to legitimize more shooting

This addition to the ordinance must be eliminated for everyone's safety.

Thank you,

Mary Jane Edalatpour  
8615 Santa Rosa Road  
Buellton, CA

Sent from my iPhone

**From:** [mary\\_heyden](#)  
**To:** [Harris, Julie](#)  
**Subject:** Comments on 2nd NOP of the EIR for Ag. Enterprise Ordinance  
**Date:** Monday, April 4, 2022 3:48:02 PM

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**Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.**

Hi Julie,

This is Mary Heyden. As a reminder, my family owns and operates the Ted Chamberlin Ranch outside of Los Olivos.

First I would like to thank you for truly listening and responding to both my personal and the Ag. Enterprise Advisory Committee's comments and suggestions submitted after the 1st NOP. It is very evident that the scope of the Ordinance has been greatly expanded. While the 2nd NOP may not address all my original concerns, I very much appreciate that the majority of my concerns were heard. Thank you!

I have two main comments on the 2nd NOP:

1. Horseback Riding (page 18): Could you please expand or include Horseback Camping groups as Exempt. There are numerous riding groups in Santa Barbara County such as: The Rancheros and the "Camps" that form the Rancheros, Santa Barbara & Santa Ynez Trail Riders, the Sage Hens, the Saddle Skirts, the Fillies, the Santa Barbara County Cattle Men and Women, and many more. These groups all have 1 or 2 weeklong or long weekend camps per year where they camp on ranches and ride every day. Some sleep in tents, others bring their own RV's. Porta-potties are used and then removed afterwards. Unfortunately, there are fewer and fewer ranches in Santa Barbara County available to these groups. It would be wonderful to be "Exempt" from needing any permitting to allow these groups to use our ranch. I do not believe this would fit under the "Camping" Use, as this use is very temporary.

27-1

Actually, it would be very nice to be able to host temporary "camps" (usually one night to long-weekend in length) for various groups. As well as there being endurance horseback riders, there are also endurance runners that will run for 4 days straight!!! Or biking groups (like the American Arthritis Foundation) that pass through the Santa Ynez Valley and need a 1 night stay for tenting along their route.

Most of these "camps" occur in the spring, early summer or later fall. Limiting the number of camps a ranch can host per month is not reasonable. Ideally a ranch of our size could host 12 camps per year. Please remember that these people are not coming on and off the property like a regular camp. Once these groups arrive, they stay on property until the end. Thus, there is not an added traffic issue. And as they are engaging in some sort of outdoor activity, most of these people go to sleep by 10:00pm, or earlier! Again, this mitigates noise and light issues.

2.Small-Scale Events (page 20): Similar to my comments above, limiting the events to 2 or 3 days per month is difficult, as most "events" happen in the Spring or Fall. Allowing 12 events per year as "Exempt" is reasonable, especially on large properties as ours.

27-2

Thank you once again for all the work you have put into this!

Sincerely,

Mary Heyden  
1-805-350-1854  
Marysneedles@yahoo.com

**From:** [Kathleen Rosenthal](#)  
**To:** [Harris, Julie](#)  
**Cc:** [Nancy Emerson](#)  
**Subject:** Agricultural Enterprise Ordinance Revised NOP project description Scoping Document  
**Date:** Monday, April 4, 2022 7:22:43 AM  
**Attachments:** [Revised Scoping Comments April 2022.docx](#)

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**Caution:** This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Ms. Harris-

Please see the attached letter with comments for your consideration in developing the Agricultural Enterprise Ordinance Revised NOP project description.

Thank you for the opportunity to comment.

Best Regards-  
Kathy Rosenthal

April 4, 2021

Julie Harris, Project Manager  
Planning and Development Department  
123 E. Anapamu St.  
Santa Barbara, CA 93101  
via email: [jharris@countyofsb.org](mailto:jharris@countyofsb.org)

RE: Agriculture Enterprise Ordinance Revised Project Description Scoping Comments

Dear Ms. Harris:

Thank you for the opportunity to review and comment on the Notice of Preparation of the Environmental Impact Report (EIR) for the Agricultural Enterprise Ordinance Revised Project Description scoping document. I have the following comments:

**General Comments:**

Thank you for recognizing that neighborhood compatibility is paramount, especially where new uses may be allowed at or near the urban/rural interface (i.e., between the City of Buellton and agricultural lands; The 246 corridor between Alamo Pintado Road and Refugio Road - AG II and 1-E-1 Zoning interface). Noise, lighting, crowds near the urban interface represent potential conflicts to otherwise quiet, semi-urban neighborhoods and require analysis and mitigation measure to eliminate conflict.

The context of the EIR must consider and emphasize the Santa Ynez Valley's equestrian heritage. Today, our horse culture and traditions are a major attraction promoted by the local Chambers of Commerce tourism websites and brochures. Horses and horse-related education and recreation are major economic drivers here in the Valley. The equestrian industry (breeding, racing, sales, showing) and recreation trail riding are prevalent here as no other place in the County. It is important to acknowledge that the AG-II lands that are the focus of this Ordinance are RURAL lands, and equestrian activities and recreation are part of the legacy of the area's ranching roots. EQUESTRIAN uses need to be allowed and included in any discussion and mitigations for facilities, transportation (right-of-way) corridors, safety, etc.

28-1

**Scoping Documents:**

The following are comments specific to the scoping documents:

Page 6, Section 3.4.1 - Agriculture Enterprise Uses: The uses should include Horse Boarding. Facilities to board horses have been driven out of Santa Barbara over the years due to escalating real estate prices and associated urban encroachment. More equestrians are looking to the Santa Ynez Valley for available and affordable boarding for their animals. It is a badly needed service throughout the County.

28-2

As horses and their use are typical on ranching lands, Boarding facilities would be an appropriate use and should be an allowed use with minimal permitting requirements.

28-2  
cont'd

Page 12, Section 4.2.12 – Transportation (and all issue areas). Include EQUESTRIAN uses in the sentence "The rural roads also serve a variety of land uses, including agricultural (horse trailers, tractors, etc.), recreational (EQUESTRIANS, cyclists) and rural residential use." Road shoulders are regularly ridden by equestrians in the Santa Ynez Valley.

28-3

**Table 1:**

**Educational Experience or Opportunity and Horseback Riding (and horse keeping)** - As the Educational Experience or Opportunity Use is edited, it only makes sense to include Horseback Riding under this category and delete Horseback Riding from its own use. Horseback tours provide excellent educational opportunities to increase equestrian knowledge and skills.

28-4

This concept is further supported by the fact that there may be several types of recreational opportunities that fall under the Educational Experience or Opportunity category (guided farm tours) that may include other recreational activities such as walking, cycling or e-bike tours (this description has been deleted from the original description). Horseback riding is only another form of recreation to facilitate these types of tours and is appropriate to be grouped with this Use.

Horseback riding and the keeping of horses is common and necessary to the agricultural operations on these larger AG-II parcels. Permitting in the traditional area of horse keeping was meant to minimize health and nuisance issues when stables are in more urban areas. On most AG-II lands, that conflict is minimal or non-existent. Horse keeping and horseback riding are a continuation of current use and should be allowed with minimal permitting requirements (i.e., Exempt).

There is no reason to regulate or demonize horseback riding/horse keeping no more than other recreational activities such as mountain bike events. Mountain Bike organizations may hold large events as the Educational Experience or Opportunity Use is written, consisting of several hundred people and most likely will alter the terrain (via grading) for special amenities (i.e., "pump track"), alter trails with jumps, berms and ramps and results in extensive and repetitive trail maintenance (24 days/year) to facilitate the activity. To be sure, mountain bike activity would result in significantly more environmental impacts than horseback riding on a ranch.

28-5

Horseback riding and ways to introduce the public to horseback riding has been disproportionately prejudiced in the County for many years. There are precious few places near urban centers to board horses, take riding lessons, and with the lack of right-of-way rule enforcement and patrols due to County staff and budget shortages, most County and US Forest Service trails are now too dangerous for equestrians to ride safely. Private ranches and farms may be the last, best hope to safely participate in the

recreational sport of equestrian trail riding with any kind of latitude enjoyed by other sport enthusiasts (hikers, e-bikes, mountain bikes) in Santa Barbara County. Horseback riding/horse keeping is an appropriate use and one of the more benign activities on AG-II lands. It should be an encouraged use.

28-5  
cont'd

Again, thank you for the opportunity to comment. I look forward to reviewing the EIR.

Best Regards,

Kathleen Rosenthal  
Solvang, CA

**From:** [Sam Cohen](#)  
**To:** [Harris, Julie](#)  
**Cc:** [Sam Cohen](#)  
**Subject:** Ag Enterprise Ordinance Revised Project Description (the "Revised Ordinance")  
**Date:** Monday, April 4, 2022 4:11:32 PM

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**Caution:** This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To the Dept. of Planning and Development; c/o Julie Harris, Senior Planner, Long Range Planning Division:

The Santa Ynez Band of Chumash Indians ("Tribe") has reviewed the Environmental Scoping Document for the Revised Ordinance dated March 8, 2022 and provides the following written comments:

1. General comments:

The Tribe appreciates the amount of work that went into preparing the revised ordinance but desires to make any exemptions into zoning clearances.

Along the same lines, the Tribe recommends making any Conditional Use Permits into Minor conditional use permits.

29-1

2. Codification of COVID-19 Special Rules

The valiant efforts by the County and the Dept. of Alcoholic Beverage Control ("ABC") to allow outdoor activities under liberalized ABC rules needs to be commended. The COVID-19 emergency may be ending due to a retraction of the virus or more likely to our learning to live with the virus and our desire to return our lives to "normal." Nonetheless, these new liberalized rules for outdoor serving of alcohol and the additional liberalized rules for serving food with alcohol are new rules that need to be codified as the :new normal."

29-2

3. Need to reduce camping Tiers from 400 acres to about 300 acres for the upper tier

29-3

Our initial review for other appropriate tiering levels below the arbitrary 400 acre level

County staff has proposed in the Notice of Preparation for the AG Enterprise Ordinance, and found 320 acres is the very logical and consistent top tier level previously applied by the County. This is based on the highest AG-II Zoning designation of AG-II- 320.

Santa Barbara County Code- Chapter 35- County Land Use & Development Code (the “Development Code”) at 35.21.040- Agricultural Zones Lot Standards, Table 2-2 provides the Minimum Lot Area/Building Site Area for Agriculturally zoned properties based on the County’s adopted “Zoning Map Symbol”.

For AG-II zoning, those Zoning Map Symbols are AG-II-40 with a minimum gross lot area of 40 acres, AG-II-100 with a minimum gross lot area of 100 acres, and AG-II-320 with a minimum gross lot area of 320 acres.

It seems highly appropriate that the County would maintain consistency by setting the tiering at the County’s adopted Zoning Map Levels within the Agricultural Zones Lot Standards. A middle tier could be set at 100 to 320 acres, with the highest tier at 320 acres and larger.

29-3  
cont'd

The County similarly developed “tiered by acreage” standards when it amended 35.21.030- Agricultural Zones Allowable Land Uses- D.Development Plan approval required, Inland area, when it created exempt thresholds for the AG-II zone in the table at b. Agricultural structural development (3).

That table provides a “Threshold” of 20,000 square feet at a Lot Size of less than 40 acres, 25,000 square feet at 40 to less than 100 acres, 30,000 square feet at 100 to less than 200 acres, 40,000 square feet at 200 to less than 320 acres, and 50,000 square feet at 320 acres or more.

This table for Subsection D.2.b.(3) seems the analogous tiering levels for environmental review of the AG Enterprise Ordinance update of AG-II allowances within the Agricultural Zones section of the Development Code.

29-4

Please contact me if you have any additional questions as to the Tribe’s comments.

Sincerely,  
Sam Cohen, Government Affairs and Legal Officer  
Santa Ynez Band of Chumash Indians  
Cell: 805-245-9083  
[scohen@sybmi.org](mailto:scohen@sybmi.org)

**From:** [Judith Stauffer](#)  
**To:** [Harris, Julie](#)  
**Subject:** Agriculture Enterprise Ordinance  
**Date:** Monday, April 4, 2022 12:45:32 PM

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**Caution:** This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Ms. Harris,

I am writing to vehemently oppose commercial hunting in Santa Barbara County. This type of activity is inappropriate as it attracts firearms, and can lead to unintended consequences such as: trespassing on other properties, poaching, non-fair-chase hunting practices / enterprises, and incidents of human injury or death.

30-1

I understand the desire to help farmers and ranchers find economically viable ways to increase their agricultural bottom line “that would be incidental to and compatible with traditional agriculture uses on land zoned AG-II.” Commercial hunting is not the answer. Similarly, what local ranchers and farmers are experiencing is not unique. There are successful agricultural practices and rancher- / farmer-based organizations that have already created scaleable models to help increase the economic viability of family farms and ranches.

If SB County is genuinely interested in helping local farmers and ranchers, I encourage you to look at organizations such as: [Blackfoot Challenge](#), [Western Sustainability Exchange](#), [Northern Plains Resource Council](#) and [Western Organization of Regional Councils](#); commercial ranching and farming operations like [TomKat Ranch](#) (Pescadero, CA) and [Singing Frogs Farm](#) (Sebastopol, CA); and by SB County incentivizing local agricultural producers to work together to find viable ways to increase their bottom line.

In the meantime, please eliminate commercial hunting from the proposed Ag Enterprise Ordinance.

Thank you,

judi stauffer  
buellton • california

**From:** [elizabeth.farnum](mailto:elizabeth.farnum)  
**To:** [Harris, Julie](mailto:Harris,Julie)  
**Cc:** [Hartmann, Joan](mailto:Hartmann,Joan); [jhparke@icloud.com](mailto:jhparke@icloud.com)  
**Subject:** Agricultural Enterprise Ordinance Scoping Document  
**Date:** Tuesday, April 5, 2022 4:44:01 PM

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Good Afternoon Julie,

I think that the last minute addition of “the activity of catching/killing fish and/or other animals, either for food or as a sport” as either an exempt or permitted use to this proposed ordinance is ill considered and reckless..

Hunting has many impacts that fishing does not, present serious health and safety concerns that fishing does not, and was not requested by enough people to spend the time and money to analyze in the EIR.

Hunting already occurs in the county according to state established seasons and rules and on private land under specific circumstances.

I can see no reason to add killing animals to this proposed ordinance which presents many opportunities for agriculturalists to achieve economic sustainability.

Elizabeth Farnum

31-1

**From:** [Djamila Cabugos](#)  
**To:** [Harris, Julie](#)  
**Cc:** [Teddy Cabugos](#)  
**Subject:** Written Comment: Agricultural Enterprise Ordinance  
**Date:** Wednesday, April 6, 2022 1:19:10 PM  
**Attachments:** [Aq Enterprise Letter from Sunstone Winery to County re Farmstay Ordinance.04.06.2022.pdf](#)

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Dear Ms. Harris,

On behalf of Sunstone Winery, attached please find our written comment on the scope of the environmental review analysis and in support of the Agricultural Enterprise Ordinance project.

With thanks and sincerity,

Teddy & Djamila Cabugos

**Djamila Cabugos, CEO**  
**Sunstone Winery**  
[125 N. Refugio Rd. Santa Ynez, CA 93460](#)  
[www.SunstoneWinery.com](#)  
[Djamila@SunstoneWinery.com](mailto:Djamila@SunstoneWinery.com)  
[\(805\) 637-9170](tel:(805)637-9170)  
We're on [Facebook](#), [Twitter](#) & [Instagram](#)...follow us @SunstoneWinery



April 6, 2022

Dear County of Santa Barbara,

Thank you for your service to the residents and businesses of Santa Barbara County. We appreciate your willingness to listen to the needs of family-owned, local businesses like ours as we partner together to achieve our collective goal of increasing economic and cultural opportunities.

We would like to express our support for the Agricultural Enterprise Ordinance project for land zoned AG-II throughout Santa Barbara County. In addition to creating revenue opportunities for agricultural businesses and landowners struggling with the realities of a new macroeconomic environment, these changes will substantially increase County tax revenue, provide educational and enriching experiences to locals and visitors alike, and enhance our region's reputation as a world-class destination to visit.

To the latter point, despite Santa Ynez Valley recently being named by Travel & Leisure magazine as one of the world's "Top 50 Best Places to Travel in 2022" and Santa Barbara County being named 2021 "Wine Region of the Year" by Wine Enthusiast magazine, our area ranks 14<sup>th</sup> out of fifteen California wine regions for visitation. In addition to tasting world-class wines, visitors to wine country also crave the unique vineyard lifestyle experiences that are currently prohibited by Santa Barbara County regulations.

Please consider the following for permissible uses on land zoned AG-II as part of the Agricultural Enterprise Ordinance that we believe will enable Santa Barbara County vineyards and other agricultural businesses to better compete with our counterparts in Napa Valley, Paso Robles, and beyond.

1. **Overnight Experiences:** The most important change needed to the County's current regulations is to allow overnight experiences on agricultural lands, thereby reversing the detrimental effect of the Short Term Rental Ordinance that went into effect on October 1, 2018. While the ordinance may make sense in more populated areas such as the City of Santa Barbara, it should not apply in the mostly rural, agricultural areas of the County. Visitors to Santa Barbara County want to have the option to escape the "city life" and experience the open land, culture, and history of local farms and ranches. By prohibiting

32-1

Sunstone Winery ~ 125 Refugio Road, Santa Ynez, CA 93460 ~ 805-688-9463

[www.sunstonewinery.com](http://www.sunstonewinery.com)

these vineyard lifestyle experiences that are available in other counties, Santa Barbara County businesses and property owners lose valuable revenue that can help sustain their businesses that are increasingly in a precarious position due to the increasing costs of labor, insurance, taxes, and raw materials, and the ongoing impact of the COVID-19 pandemic. Allowing short term rentals in agricultural areas and allowing businesses to market these experiences on Airbnb or VRBO will ensure the viability of these businesses while delivering much needed funding to the County's tax coffers.

32-1  
cont'd

2. **RV Experiences:** RVs are the latest travel trend, initially prompted due to the COVID-19 travel restrictions, but continuing to grow in momentum even on COVID-19's decline. Permitting overnight RV stays on agricultural lands will create low-investment revenue opportunities directly to the landowner who may rent the space on a short term basis, as well as indirectly to the community at large through an increase in tourism. Overnight RV stays will provide visitors with the unique opportunity to experience a farm lifestyle with a minimal impact on the land. The fact that agricultural lands are large parcels means that these RVs can be parked on private properties out of sight and mind from neighbors and passersby.
3. **Serving Food Onsite:** An additional important change we are requesting is to allow vineyards and other agricultural businesses to prepare and serve food on their premises, similar to any other restaurant, retail store, or event venue in the County. Visitors to our area want to be able to go directly to the source for wine-and-food-pairing and farm-to-table experiences but do not have this option under current County regulations. In our case, we have existing infrastructure already built in and ready to be permitted but cannot take advantage of this potential \$250,000 revenue opportunity. Instead, left with no alternative, we contract for a third-party food truck to park on our property to serve our patrons. Lifting these restrictions will put wineries, vineyards, and farms on even footing not only with similar businesses in other regions but with restaurants and other food service establishments in our own region.
4. **Event Allowance:** The final change we believe would be a "game changer" for agricultural businesses in our County is to uncap limits on agricultural and cultural events such as food festivals, music festivals, and operas, which are currently limited in size, scope, and frequency. In addition to creating revenue opportunities for our local businesses, this change would add immeasurable benefits to the community by providing access to experiences now available only in other counties. Santa Barbara County residents will no longer need to travel and spend their money in other places but rather be able to enjoy world-class amenities and experiences right here at home.

32-2

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32-4

We wholeheartedly believe these proposed changes and this overall holistic strategy will be a win-win for all stakeholders in the County- hotels, restaurants, small business owners, residents, families, visitors, property owners, and taxpayers. The old adage "a rising tide lifts all boats" could not be more apropos in this situation.

Your task in balancing the many needs of our community is a difficult one, but we believe that working together and implementing these changes will benefit our entire County in countless ways. Thank you again for your commitment to the people of Santa Barbara County, and for supporting this initiative to ensure a strong, competitive local economy in the 21st century.

Sincerely,

Teddy & Djamila Cabugos  
on behalf of Sunstone Winery

**From:** [Doug Kern](#)  
**To:** [Harris, Julie](#)  
**Cc:** [Phil Mckenna](#); [Ana Citrin](#); [Marc Chytilo](#)  
**Subject:** GCC Comments - Agricultural Enterprise Ordinance Revised Project Description, Second Notice of Preparation and Scoping of an Environmental Impact Report (EIR)  
**Date:** Wednesday, April 6, 2022 11:35:54 AM  
**Attachments:** [GCC Comments Ag Enterprise Ordinance 4-6-2022.pdf](#)

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Dear Ms. Harris,

Please find GCC comments on the Second Notice of Preparation and Scoping of an Environmental Impact Report (EIR). We appreciate your attention and consideration to our comments.

With best regards,

Doug

Doug Kern  
Executive Director



(805) 222-6184



April 6, 2022

Julie Harris  
Long Range Planning Division  
Planning and Development Department  
123 East Anapamu Street  
Santa Barbara, CA 93101

*Email to [jharris@countyofsb.org](mailto:jharris@countyofsb.org)*

RE: STATE CLEARINGHOUSE NUMBER: 2021110353, Agricultural Enterprise Ordinance Revised Project Description, Second Notice of Preparation and Scoping of an Environmental Impact Report (EIR), PROJECT CASE NO.: 20ORD-00000-00013 and 20ORD-00000-00014

Dear Ms. Harris,

Gaviota Coast Conservancy (GCC) appreciates the opportunity to provide comments on Case Nos. 20ORD-00000-00013 and 20ORD-00000-00014 Agricultural Enterprise Ordinance Revised Project Description.

GCC is dedicated to protecting the rural character and environmental integrity of the Gaviota Coast for present and future generations, as well as encouraging public access and recreation. We greatly appreciate the County's work on the Agricultural Enterprise Ordinance (AEO), and in particular appreciate new revisions that support regenerative agricultural practices (i.e. composting).

Our comments today focus on the Campground Use identified in Table 5-2 Summary of Proposed Ordinance Amendments. We note that a number of protective limits have been removed in this version of the scoping document and without a better understanding of what is intended, our view is that these changes could significantly impact the rural character of the Gaviota Coast. Removing protective measures may inadvertently create the situation that exists at Rincon Parkway on Hwy 1 off the Ventura Freeway. Is this desirable and who benefits from these changes?



For the Campground Use we provide additional comments for each of the proposed changes in the attached Table 1.

We're concerned that as currently drafted, the camping section of the Agricultural Enterprise Ordinance is beyond the scope of what was intended for the Gaviota Coast. We request that the Draft EIR carefully identify and analyze potential impacts to the Gaviota Coast, and tailor the Coastal Zoning Ordinance portion of the AEO to avoid adverse impacts, including by retaining Gaviota Coast Plan restrictions within the Gaviota Coast Plan Area.

Thank you for your attention to this important habitat, visual and aesthetics protection issue on the Gaviota Coast. We appreciate your consideration of our scoping comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Doug Kern".

Doug Kern  
Executive Director

Table 1

Table Heading	Proposed Change	Comment
Use	"Small Scale" campground is deleted, along with the footnote that a small scale campground in currently allowed within the Gaviota Coast Plan	The Gaviota Coast Plan was developed over a 10-year period and negotiated between many stakeholders. At that time, "small scale" is what the stakeholder desired and felt was commensurate with protecting this beautiful coast. We strongly object to re-writing that plan through the Agricultural Enterprise Ordinance as RV Camping is not agricultural in nature. We request that the Draft EIR evaluate retaining limitations that currently apply within the Gaviota Coast Plan.
Description	A site for temporary occupancy by campers which may include individual campsites. May include accommodations for recreational vehicles. <del>unless prohibited within the applicable zone.</del> "Unless prohibited within the applicable zone is stricken."	Prohibitions within applicable zones are set for good reasons and have been developed and tested over many years. Allowing recreational vehicles within the Coastal Zone along the Freeway overlooking the ocean could result in a parking lot of RVs along the coast, ruining the Aesthetics and Visual Resources of the Coast that many have fought for decades to preserve. We request that the Draft EIR explain existing zoning restrictions and analyze the impact of this change on Gaviota Coast resources.
Exempt	Footnotes #2 and #3 have been stricken, #2 Unless it is an exempt use (i.e., farm stands), all uses in the Coastal Zone require a Coastal Development Permit; a Zoning Clearance is not an option. #3 In the Inland Area, the Board may allow a use with a Zoning Clearance or Land Use Permit, rather than as an exempt use.	These footnotes provide important clarification and we question their proposed deletion. Please ensure that ordinance remains clear that CDPs are required for all non-exempt uses in the Coastal Zone.
ZC or LUP (Inland) CDP (Coastal Zone)	10 campsites have been removed. Increased numbers of campsites have been inserted. # campsites per premises size ≤ 100 ac – up to 15 sites	Again, the Gaviota Coast Plan previously evaluated camping on the Gaviota Coast and intentionally limited RV camping to 10 sites. We are concerned about increasing these limits for RV campgrounds on the Gaviota Coast, and ask that they be retained within the Gaviota Coast Plan Area.

33-1

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33-3

33-4

	> 100-400 ac – up to 20 sites > 400 ac – up to 30 sites	
ZC or LUP (Inland) CDP (Coastal Zone)	RVs/trailers 25' max length has been stricken, suggesting that there is no maximum length for a recreational vehicle on the Gaviota Coast.	Recreational Vehicle (RV) campers may reach up to 45feet in length. Eliminating the maximum length creates opportunities for these largest RVs to become the most visible element on the coast, which is not appropriate for the rural Gaviota Coast.
ZC or LUP (Inland) CDP (Coastal Zone)	<p>Inserted: Landowner may provide no more than one of the following semi-permanent accommodations per campsite:</p> <ul style="list-style-type: none"> <li>• park trailer</li> <li>• yurt or tent cabin</li> <li>• Airstream or other RV trailer (25' max length)</li> </ul> <p>Max length has been removed</p>	We appreciate that the campground stakeholder that wished to provide these comments restricted camping accommodations to a single unit. However, it is unclear what is meant by a “park trailer” versus and RV trailer, or why the Airstream is called out individually. An Airstream is an RV trailer. We repeat our comment regarding removing length restrictions on RVs and suggest that very large RVs will change the character of the Gaviota Coast, which was intentionally limited in the Gaviota Coast Plan.
ZC or LUP (Inland) CDP (Coastal Zone)	No more than 50% ½ of total campsites may host RVs/trailers/yurts/tent cabins at one time, has been stricken.	In other words, the campground proponent would like to be able to maximize the use of the campground up to 100% occupancy, creating congestion and visual impacts, as well as impacts on resources such as water and sewage, and overall crowding.
14 30 day max stay	14 day maximum stay has been stricken in favor of a 30 day maximum stay.	Bureau of Land Management Policy is 14 days. National Park Service Policy is 14 days. Even the Rincon Parkways campground policy is 14 days. The Draft EIR needs to evaluate whether permitting long term camping on the Gaviota Coast is appropriate for a vulnerable and intact ecosystem? The 14-day policy is put into place to protect natural resources, address sanitation issues, prevent camps from monopolizing popular sites, and to control squatting. These are time-tested reasons for not increasing limits on maximum stays.

33-5

33-6

33-7

**From:** [Ana Citrin](#)  
**To:** [Harris, Julie](#)  
**Cc:** [Doug Kern](#); [Phil Mckenna](#); [Marc Chytilo](#)  
**Subject:** LOMC/GCC Revised AEO Scoping Comments - composting and hedgerows  
**Date:** Wednesday, April 6, 2022 4:01:42 PM  
**Attachments:** [LOMC to Harris\\_AEO Revised Scoping\\_4-6-22\\_FINAL.pdf](#)

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Hi Julie, attached please find a comment letter submitted by this office on behalf of GCC on the revised AEO NOP, specifically addressing composting and hedgerows (as before). I know Doug Kern also submitted comments from GCC directly on the campground issue. This letter is silent on that and other proposed non-ag uses since it is coming through our GAP involvement which is exclusively focused on regenerative agricultural practices - hopefully that doesn't create any confusion.

Thanks again for all your work on this!!

Best regards,

Ana

--

*Ana Citrin*

Law Office of Marc Chytilo, APC

P.O. Box 92233

Santa Barbara, CA 93190

Phone: (805) 570-4190

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\*\*\*\*\*

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\*\*\*\*\*

# LAW OFFICE OF MARC CHYTILO, APC

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ENVIRONMENTAL LAW

April 6, 2022

Julie Harris  
Santa Barbara County Planning & Development  
123 E. Anapamu Street  
Santa Barbara, California 93101

RE: Agricultural Enterprise Ordinance Environmental Impact Report Revised NOP Scoping Comments

*Dear Ms. Harris,*

This office represents the Gaviota Coast Conservancy (GCC), a California public benefit organization dedicated to protecting the rural character and environmental integrity of the Gaviota Coast for present and future generations. A key part of GCC's mission is to encourage regenerative agriculture practices that build soil, manage water wisely, reduce toxic chemical use and support biological resources. To advance its mission in this area, GCC awards grants to projects that help expand the acreage and number of farmers and ranchers using regenerative agricultural practices in the Gaviota Coast area, and funds the Gaviota Agricultural Project (GAP) to advise this grantmaking effort, which includes conservation partners at the Community Environmental Council (CEC), Cachuma Resource Conservation District (CRCD), and The Land Trust for Santa Barbara County (LTSBC). A key objective of GAP's work is to identify and address regulatory barriers that stand in the way of more widespread adoption of regenerative agricultural practices.

We submitted scoping comments on the initial Notice of Preparation (NOP), requesting certain changes to the proposed Agricultural Enterprise Ordinance (AEO) Project Description that encourage regenerative agricultural practices on the County's Ag-II zoned lands, specifically by reducing regulatory barriers to composting and pollinator hedgerow use.

We very much appreciate that revisions to the Project Description in the revised NOP include meaningful changes in the composting section, that directly respond to the concerns we raised in our initial scoping comments. 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 proposed broadening with respect to agricultural composting including increasing the quantity of compost and compost-related materials that can be stored on-site at any one time, the amount of compost that may be sold or given away annually, and the allowable feedstocks that can be used (including food waste and manure) will further incentivize this beneficial practice. This in turn will advance the Project's objectives,

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confer Class IV (Beneficial) impacts, mitigate significant project impacts, and advance State and County policy goals.

We are disappointed however that our requested changes that would incentivize the use of pollinator hedgerows were not included in the revised NOP Project Description. Pollinator hedgerows provide year-round habitat for insects that provide both pollination and pest control services, and thus enable farms to be both more sustainable and more cost effective. The letter from Denise Knapp, Ph. D., Director of Conservation and Research at the Santa Barbara Botanic Garden (Exhibit B to our December 17, 2021 scoping comments) includes a review of scientific literature explaining these benefits of pollinator hedgerows in greater detail. Despite these benefits, which have been shown elsewhere in California and beyond, pollinator hedgerows are highly under-utilized in Santa Barbara County. One reason for this under-utilization is the concern that farmers may be constrained in their ability to remove hedgerows comprised of native plants if the County<sup>1</sup> determines the hedgerows must be protected as habitat. This concern is particularly acute in the Coastal Zone where the broad definition of Environmentally Sensitive Habitat (ESH) could potentially be used to argue that removal of a native plant hedgerow constitutes a violation of the Local Coastal Program (LCP).

While Pollinator Hedgerows are not an identified category of use in the AEO Scoping Document, we believe addressing barriers to implementation of this regenerative agricultural practice furthers the AEO's Project Objectives, and should be integrated into the Draft Environmental Impact Report (DEIR) either as a component of the Project Description, a Mitigation Measure to help reduce other Project impacts, and/or as part of a Project Alternative geared toward further encouraging regenerative agricultural practices. Our specific requested additions in this area are detailed in our December 17, 2021 scoping comment letter.

34-1

We appreciate your consideration of these comments, and request that they be addressed in the AEO DEIR.

Respectfully Submitted,

LAW OFFICE OF MARC CHYTILO, APC



Ana Citrin  
For Gaviota Coast Conservancy

---

<sup>1</sup> While the California Department of Fish and Wildlife, and the California Coastal Commission in the coastal zone, each have enforcement authority over endangered and threatened species and Environmentally Sensitive Habitat Areas (respectively), advancing these changes at the County level is a necessary first step to addressing this issue more broadly.

**From:** [Nancy Emerson](#)  
**To:** [Harris, Julie](#)  
**Cc:** [Susan Belloni](#); [Barbara Bierig](#); [Susan Bott](#); [Eileen Caris](#); [Theresa Reilly](#); [Kathy Rosenthal](#); [Jessica Schley](#); [Susan Bott](#); [Teresa McNeil MacLean](#); [Nicole Peña](#); [Theresa Reilly](#)  
**Subject:** Ag Enterprise Ordinance, Comments about Revised EIR Scoping document  
**Date:** Wednesday, April 6, 2022 11:28:29 AM  
**Attachments:** [WEWAgEnterpriseEIRScoping4622.docx](#)

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Julie,

Thank you for an enormous amount of work to get us to this point with the Ag Enterprise Ordinance. It has to be one of our most complicated ordinances.

I've attached WE Watch comments about the revised Ag Enterprise Ordinance EIR Scoping document.

Here are some specific editing suggestions/questions, some of which may enable you to slightly reduce the number of categories, which would be helpful to you and us.

**1. Table 5.2.** Footnote numbers 1-4 need to be removed from the headings on each page since those footnotes were removed. Also the astericks on words in the Use column on page 16, 18, 21-26 need to be removed as that footnote was crossed out. | 35-1

**2. Pg. 17. Academic & Technical Training for Farmers & Ranchers.** Make this a separate category in Exempt & ZC or LUP/CDP columns. See WE Watch document for explanation. It would include both small and larger groups/tours depending on topic. Not sure acreage size should be determiner for # of participants. | 35-2

**3. Pg. 17. Small Guided Tours.** Move under Educational Workshops & Experiences for the General Public. Size of groups should probably be smaller here than for academic & technical training for farmers & ranchers. See WE Watch document. | 35-3

**4. Pg. 17. Educational Experience. Use Column.** Under Educational Workshops & Experiences for the general public, Bullet 4. Add **Art** to read **Art and Photography**. Artist groups are very interested in having access to farms and ranches for plein air painting or sketching classes/workshops/opportunities. Our expert on horseback riding suggests moving it to this category. | 35-4

**5. Pg 18. Fishing Operation, Aquaponics.** Nothing is mentioned about ponds in either section, perhaps because farm ponds are already allowed as an agricultural activity. It would clarify these uses to mention the ponds. | 35-5

**6. Pg. 26. Tree Nut Hulling.** Why is this in a separate category from Ag Processing? Could it be a bullet under Ag Processing? | 35-6

Nancy E.

*WE Watch, P.O Box 830, Solvang CA93464*

April 6, 2022

TO: Long Range Planning, Julie Harris  
 FROM: WE Watch, Nancy Emerson, President  
 RE: Comments on Revised Environmental Scoping  
 Document for Agricultural Enterprise Ordinance,  
 Revised Project Description.



Thank you for the opportunity to comment further on the revised Environmental Scoping Document for the Agricultural Enterprise Ordinance. The Santa Ynez Valley will be a prime location for implementing this ordinance. It is very important that the SYV Community Plan Update be utilized throughout the process of adopting this ordinance, and particularly during the EIR work. It's Design Overlays need to be considered in that work.

**A.Overriding Considerations.** Many of the uses included in this ordinance are going to be pilot projects or expansions of existing small projects. If sizes being analyzed in the current descriptions are unchanged after the EIR, some would no longer be “incidental” to agriculture or would open the door to that ultimate result.

Overriding Considerations adopted with the Cannabis Ordinance and the designation of the EIR as a Program EIR have made it almost impossible for neighbors and community organizations to successfully appeal. It is critical that the findings of the EIR be honored in deciding whether or not a given use and potential sizes should be included in the final ordinance. We want agriculturists to be able to try new ways to share the agricultural experience with others as long as other residents have a voice in the evaluation of their impact on neighborhoods. Overriding Considerations, which are a tool for making the EIR impotent, should not be used.

35-7

**B. Right to Farm Ordinance.** How will the Right to Farm Ordinance and the Agricultural Enterprise Ordinance relate to each other and which will be primary where any neighbor complaints are concerned? Most of the uses in the Agricultural Enterprise Ordinance should not be protected by the Right to Farm Ordinance. Please add a sentence such as the following to the new ordinance:

35-8

“While potential land use conflicts between agriculture and residences may result from normal agricultural practices, such as noise, dust, light, and odors, the addition of supplemental, accessory agricultural enterprise uses that may create additional noise, traffic, light or other concerns will be not be protected by the Right to Farm Ordinance.”

**C. Definition of “incidental” and “supportive of”** (pg. 7). You may already have planning definitions for these words. But if not, it is critical that they be carefully defined

and provided before the EIR work begins. Evaluating whether a use is “incidental” or “supportive of” should be part of the EIR’s Land Use and Planning section. The ordinance is built on the sentence, “To qualify for any of these uses with a permit exemption or a low-level permit, the use must be **incidental** to, and **supportive of**, an ongoing agricultural operation located on the property.”

35-9

We think the above sentence leaves a loophole since one could assume that projects requiring higher level permits may not have to meet the requirement that the use be incidental and supportive of ongoing agricultural operations. It needs to be clearly stated that these criteria apply to all projects regardless of permit level.

**D. Farmers & Ranchers on AG-I sites.** We continue to be concerned that AG-1 agriculturists are left out of these opportunities when they may be the group most in need of additional income sources. Their concerns were voiced in the WE Watch sponsored Ag Tourism discussions. Will you please explain how you plan to help them?

Our suggestion is to include them in the LUP for campgrounds, small events, farm stands, ag processing, ag product preparation and tree nut hulling. Questionable activities for AG-1-5 sites have been proposed and approved in the past because the zoning allowed them. We recommend that AG-1-5 not be included. Make a decision regarding AG-10 based on whether there are AG-1-10 commercial farming sites where neighborhoods would be ok for certain agricultural enterprise activities or whether it should be limited to AG-1-20 and 1-40 sites.

35-10

**E. County Planning Commission.** We understand that the plan is to bypass County Planning Commission formal input before doing the EIR and to consolidate ordinance and EIR review after the EIR is completed. We realize it streamlines the process to do that. However, this is an unusual ordinance and WE Watch thinks it is important that the County Planning Commission be consulted about the ordinance description. Also, it would allow dialogue between the Commission and the public BEFORE the EIR begins. The potential for an out-of-control ordinance is great.

35-11

**F. Cumulative Impacts.** Cumulative impacts are very important for this ordinance as there are a lot of options, all of which could potentially be used by a given farm or ranch. It may be the most difficult task for this ordinance and the EIR may indicate that there should be some limits on how many uses can be active at one time.

35-12

**G. Enforcement of regulations.** Given that enforcement in our county is largely a result of citizen complaints, this ordinance has a lot of enforcement implications. Enforcement plans need to be a component of the ordinance.

35-13

**H. Existing uses in Chapter 35 and Inclusion in Agricultural Enterprise Ordinance.** Agricultural processing, aquaponics, composting, firewood and lumber processing, plus wineries are all agricultural uses included in Chapter 35. Is their inclusion here an effort to streamline their regulations and group them with other uses that have an enterprise dimension? To make useful comments seems to require finding and studying Chapter 35

35-14

descriptions of them, which was not mentioned in the original or revised ordinance scoping document. We have looked at these sections but did not have time to directly compare them with the Ag Enterprise text.

### **I. Specific questions or comments about text section.**

**4.2.3., pg. 9. Air Quality.** The Santa Ynez Valley especially has air quality problems caused by approved, controlled burning at certain times of the year. Please include the cumulative impact of additional controlled burns, campfires, sawmills, etc. on farms and ranches as a result of new projects in your study of air quality.

35-15

**4.2.4. pg. 9. Biological resources.** The Deciduous Oak Tree & Protection & Regeneration Ordinance is not mentioned in Biological Resources. Please include evaluation of this issue in the work done in this section. (Compliance with this Ordinance noted under Firewood & Lumber uses.)

35-16

**4.2.12. pg. 12. Transportation.** The issue of whether or not to require onsite parking vs allowing parking along roads for certain uses, e.g. Educational Experiences, is not mentioned in this section. Please include this in the work done in this section as it will be needed to evaluate what limits, if any, should be placed on the number of vehicles and/or number of participants allowed. Parking in a field may have less environmental impact than requiring special surfaces for parking areas. Parking along roads in a neighborhood can be seen by neighbors as a very negative impact.

35-17

**4.2.9 Land Use and Planning.** Thank you for including lighting. Are you planning to evaluate both indoor and outdoor lighting needs? If not, we suggest specifying “outdoor lighting.”

35-18

**5.0. pg. 13. Description of Permit Types.** There are philosophical considerations involved when one allows an exemption from any permit, or a ZC permit, neither of which are noticed or appealable. While making it simpler and cheaper for the agriculturist, it removes neighbors and the community from the planning process. There needs to be more discussion of this matter, including the pros and cons, so they can be weighed before allowing an exemption or a ZC permit.

35-19

### **G. Specific questions and comments about Table 5.2.**

**Table 5.2. pg. 15. Summary of Proposed Ordinance Amendments.** Thanks for this excellent format.

**Pg. 16. Campground.** Total acreage seems a reasonable tool for determining number of campsites.

1. Should there be a limit to the number of campers?

2. Does the EIR need to distinguish between tent and camping/yurt and tent cabins and RVs?

35-20

3. Should there be some limit on number of and size of RVs allowed? An RV has considerably more visual and space impact than tents. Two vehicles/site allows for a maximum of 60 vehicles in the campsite area + potentially 30 RVs of any size. Under description it simply says, "May include accommodations for recreational vehicles." RVs, because of their size, could push aesthetics to point where campground is no longer an ancillary activity to agriculture. How will the EIR evaluate when that point is reached?

35-21

4. If camping for up to 30 days is allowed, one needs a water supply, showers, and a more sophisticated sewage treatment system than just septic tanks for any kind of camping. This is an important environmental issue.

35-22

**Pg. 17. Small Guided Farm or Ranch Tours.** Since Academic & Technical Training for Agriculturists could have either small, guided tours or larger educational events, we suggest moving Small Guided Farm or Ranch Tours to first bullet under General Public Experiences. At WE Watch discussions on Ag Tourism, it was an important component of experiences for the general public.

35-23

**Pg. 17. Educational Experience, Academic/technical training for agriculturists.** Acreage may not be an appropriate control on the number of attendees allowed.

Smaller acreages may demonstrate innovations that need to be seen by as many attendees as possible. Would parking availability be a more useful, less arbitrary tool for controlling the size of these uses?

35-24

We hope the Growers-Shippers, the Ag Commissioner, the Cachuma Resource Conservation District, the SB County Vintners Association, the Cattlemen and Cattlewomen, etc. organizations will address these questions as they are the ones planning educational activities for agriculturists on farms and ranches.

**Pg. 17. Educational experiences for the general public.** We question whether acreage should determine the size of groups. Most of the examples listed seldom go above 25-30 participants to ensure a quality experience for each individual. Even a maximum of 100 seems high for many of the activities in this use category. Parking availability seems to us to be the environmental issue, not size of property. Parking availability under Transportation and impact on Biological Resources are important EIR related issues.

35-25

For example, Birding classes limit size to 20-30 persons as do botany and other natural history trips, e.g. the SB Museum of Natural History, the SYV Natural History Society, and Community College adult education field trip classes. The SYV Women Hikers has 80+ members on its roster, but its members tell us that 20 is the most they have ever seen on a given hike. Sedgwick Reserve (6,000 A) divides a group that has never been more than 70 people into 4 or 5 different groups which then hike different parts of the Reserve.

Astronomy tourism uses can vary in size depending on the location and the type of event. In addition to our county's two Astronomy organizations (SB and Lompoc), similar organizations from elsewhere could travel to farms and ranches to observe the night sky.

The Santa Barbara Astronomical Unit does Astronomy Nights at Cachuma Lake that regularly serve 150 people. Individuals might stay in a farm or ranch campground to do astronomy. Cuyama and the Santa Ynez Valley are the best potential locations for astronomy activities. This is a good reason for Santa Ynez Valley farms and ranches to make all their lighting dark sky friendly and for all in our Valley to be careful with lighting.

35-26

Hiking is not mentioned in either Educational Experiences or Small-Scale Events. If there is a natural history component, then it could fit with Educational Experiences but if none, then it would be a Small Event use.

35-27

**Pg. 18. Hunting.** We are concerned about the addition of hunting. For some people it is an animal rights issue. But removing that philosophical issue from the equation, it still is complicated.

1. How far a shot will travel depends on the type gun used. But .22 ammo can travel a mile and a shot gun slug can travel 3600 feet (nj.gov). So safety of those elsewhere on a given ranch or farm, neighbors and vehicles traveling on nearby roads is an issue. UCSB Sedgwick Reserve, which is off-limits to hunters, notifies its volunteers and researchers about deer hunting season to warn them about the danger to its land due to hunting elsewhere. Safety is included in Land Use and Planning and is a major reason we are concerned. For this reason alone, only very large acreage ranches should even be considered for hunting.

35-28

2. It is not compatible with many of the other activities included in the Ordinance. So anytime hunters were on a property, it should rule out other activities involving the general public.

3. The CA Hunting Regulations are VERY complex. Hunting seasons, other than for wild pig, are short, unlike the other activities included in the Ordinance. E.g. (2022 seasons: Deer -Aug 13-Sept. 25, Deer, archery July 9-31; Bear 2<sup>nd</sup> Sat of Aug -Dec. 31; Wild pigs – all year. Wild turkeys, 2022 spring & fall season, Mar. 26 – May & Nov. 12 -Dec. 12).

4. Is it even cost effective for Planning to spend time and money to evaluate this activity, given the very few properties large enough to safely qualify?

**Pg. 18. Horseback Riding.** It makes sense to include Horseback Riding under Educational Experience/Opportunity (general public) and delete Horseback Riding as a separate category. Horseback rides and tours provide excellent educational opportunities to increase equestrian knowledge and skills as well as appreciation of agriculture and the natural world.

35-29

This concept is further supported by the fact that there may be several types of recreational opportunities that fall under the Educational Experience or Opportunity category (guided farm tours) that may include other recreational activities such as walking, cycling or e-bike tours (this description has been deleted from the original

description). Horseback riding is only another form of recreation to facilitate these types of tours and is appropriate to be grouped with this use.

**Pg. 19. Incidental Food Service at Winery Tasting Rooms, AG-I & AG-II.** We support food service as outlined, having learned that there have been no complaints about its addition during COVID. It should lessen the effect of alcohol on driving. We are not sure how food trucks obtain the energy needed to produce meals and whether in some cases, noise becomes an issue. This applies to both winery and non-winery food service. Should wineries with wine tasting be allowed to have restaurants? What are the pros and cons of this? In adding AG-1 for wineries, there was at least one Los Olivos AG-I-5 neighborhood very concerned about a winery building that ended up being approved. Are there already AG-1-5 tasting rooms to which this regulation would apply? If not, could including AG-1-5 encourage the addition of tasting rooms on parcels where such an activity would be questionable?

35-30

**Pg. 20. Incidental Food Service (Non-winery locations).** Providing food service should reduce need for attendees at various events to leave the site to obtain food, reducing traffic.

**Pg. 20. Small Scale Events.** We need discussion about whether acreage should be the limiting factor on size. Also, we would not describe events with 100 or 150 participants as “small events.” We realize the EIR needs to be expansive enough to consider a variety of options but exempting a 100-person event from any regulation is a step too far in this category. Our Item C (pgs.1 & 2) recommendation that “the use must be incidental to, and supportive of, an ongoing agricultural operation located on the property” applies here. Parking and Noise issues are important here. “Non-motorized” is a very important term in this section and needs to be retained.

35-31

The number of events and annual maximum attendance figures need very careful evaluation in terms of environmental impact and staying incidental, rather than becoming primary uses.

**Pg. 21. Ag Processing, Ag Product Preparation.** Could odor be a problem here? Some products will need to meet public health standards. Where in the EIR would this be considered?

35-32

**Pg. 22. Aquaponics.** Won't this require farm ponds? Somewhere in the production process there must be monitoring for product health standards, but that seems to be outside purview of EIR.

35-33

**Pg. 23. Composting.** Might there be air quality problems, either because of odor or compost being dispersed by wind?

35-34

**Pg. 24. Farm Stand.** Including 50 sq. ft. for sale of non-agriculture beverage & food products requires rethinking “farm” stands. It would serve the needs of bikers and

35-35

horseback riders and would be appreciated by them. It would support the County Recreation Master Plan.

35-35  
cont'd

**Pg. 25. Firewood & Lumber.** Noise, air quality and fire danger are EIR issues for this use.

35-36

**Pg. 26. Tree Nut Hulling.** Does this differ enough from Ag Processing to require a separate category?

35-37

**From:** [Chip Wullbrandt](#)  
**To:** [Harris, Julie](#)  
**Cc:** [Tyler Thomas](#); [Matthew Bieszard](#); [Alison Laslett](#)  
**Subject:** Re: Agricultural Enterprise Environmental Scoping Document (NOP) Comments to Proposed Ordinance Amendments  
**Date:** Wednesday, April 6, 2022 5:15:26 PM

**Caution:** This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Julie,

Thank you for the opportunity to provide comment on the Revised Notice of Preparation (NOP)/ Environmental Scoping Document for the Proposed Agricultural Enterprise Ordinance, dated March 8, 2022. As we discussed in our call yesterday, I have been working as part of the Santa Barbara Vintners Advocacy Committee, along with Tyler Thomas, Matthew Bieszard and others, and we have also been participating on the Work Group organized through Third District Planning Commissioner John Parke on these issues. We again appreciated the opportunity for yesterday's call with you, David Lackie and Dan Klemann. As promised, I am here providing comments for the Santa Barbara Vintners. We will also work on collecting additional details about the levels of use which would make certain proposed activities economically attractive for agricultural landowners, and continue to provide that through Tyler Thomas on the Agricultural Advisory Committee:

1) General-

As a general comment, we appreciate the revisions in the project description summary table, particularly to the extent that the limitations have become more broad and such limitations and development standards have been deferred to the EIR. We urge, however, that the project as review be as broad as reasonably possible and with higher levels of potential use, that the EIR preparation process then be used to identify potentially significant impacts and any necessary mitigations for those more broadly defined and less limited uses, and that ultimately the decision makers be allowed to balance and determine such levels of use and not be precluded from allowing what they may deem reasonable and economically beneficial use levels due to the lack of review of such higher levels. As I will discuss further below, we also urge that in a few instances the County use existing standards and allowances. Tribe appreciates the amount of work that went into preparing the revised ordinance but desires to make any exemptions into zoning clearances.

36-1

2) Campground-

As I explained in our call, we urge that the County use the adopted County AG-II zoning designations for those instances where uses are "tiered" to parcel or premises size, and that any additional tier be

36-2

consistent with those already in the Development Code for use in determining exemption by size to the Development Plan requirements on AG-II zoned parcels. As you know, those AG-II zoning designations are AG-II- 40, AG-II-100 and AG-II-320. The top size for all scalability should coincide that the 320 acre size in AG-II-320. The existing table could than provide for up to 15 sites with a premises less than 100 acres, 20 sites for between 100-320 acres, and 30 sites for over 320.

36-2  
cont'd

3) Educational Experience or Opportunity and Small-Scale Events-  
The thresholds provided for each of these uses seem both arbitrary and extremely limited. As an opening comment, we have noted that for WInery properties these activities are all already allowed and exempted by the Development Code definition of “WInery Special Event”, which exempts all such activities involving fewer than 80 visitors. There is no limit on the annual number of activities or annual maximum attendance. As AG-II winery properties are often owned/operated in conjunction with vineyard, grazing, or other agricultural or open space properties, we urge that for environmental review the same 80 visitor threshold be the lowest level for any AG-Ii property. The EIR should then look at whether higher visitor use for such Educational Experiences or opportunities should be allowed at premises of less than 100 acres, 100-320 acres, and over 320 acres. If these additional activities above the 80 visitor exempt threshold are to be allowed on AG-II premises, they should be allowed on all AG-II premises, including those with wineries, in particular as the winery premises will already have infrastructure to support such uses.

36-3

#### 4) Incidental Food Service at Winery Tasting Rooms-

In 2019, the State recognized the benefit of food service at wineries, breweries and tasting rooms and created the category of “host kitchens” which could then be used by EHS permitted caterers for such food service. In 2020, with the COVID- 19 restrictions, the Department of Alcoholic Beverage Control (ABC) work with the State Health Department and local agencies to allow tasting rooms to be operated under rules developed for restaurants to allow tasting rooms to open for outdoor tasting so long as they also provided incidental food service for those customers.

With work from the various County Departments, Santa Barbara County developed an Emergency Covid Ordinance which included waiver of Development Code and development permit limitations on food service at tasting rooms, so long as they met otherwise applicable requirements of EHS. That Ordinance was reviewed and recommended for adoption by the Planning Commission and adopted by the Board of Supervisors in June of 2020.

In September 2021, with continued COVID concerns and the need to provide for economic recovery, the Board of Supervisors extended and expanded those provisions as Emergency Rule Number 3, including the waiver of and Planning and Development restrictions or limitations on food service at tasting rooms so long as they met the

DHS requirements for such food service and facilities. With the recommendation of the Planning Commission and with very supportive public comment, that waiver extension was extended through October 31, 2023.

At both the Planning Commission and the Board hearings there was discussion of the fact that there had been no complaints to Planning and Development concerning food service at tasting rooms during the over 1 year of the initial waiver, and there was discussion that the Emergency Rule seemed to have been well written and well implemented.

Emergency Rule #3 was codified at Development Code Section 35.84.040 and 35.108.090. The Rule includes a sort of “safe harbor” Zoning Standard Relief Checklist for owners to report changes made for COVID-19 protection and/or economic recovery- sort of like a simplified Zoning Clearance. Other than in filling out that form, the details of complying with the requirements of EHS and its implementation of oft changing State regulations for food service are left between the owner/operator and EHS.

We now have a nearly 2 year track record for that Emergency Rule #3 approach and implementation. As we understand, there have still been no public complaints, and the waiver and deferral to EHS has worked extremely well. While we appreciate your efforts to craft new rules to continue to allow low level permitting of incidental food service at wineries, from my detailed discussions with EHS I find the proposed new rules are not necessarily consistent with EHS terminology, may not be as broad as currently permitted, and don't provide for potential future changes in food service/health related rules.

We strongly urge that the EIR review permanent continuation of the Emergency Rule #3 waiver, which provides an excellent baseline and understandable and correct rules, with the goal to provide permanent codification of the system that has worked so well to this point, and upon which tasting rooms are already planning to follow for the next nearly two years..

36-4

5) Ag Processing Beyond the Raw State and Ag Product Preparation- The EIR should include ag processing for beer, mead, and spirits from locally produced agricultural products, and the size of any new structures should be scalable to premises size.

36-5

6) Farm Stand- I have not been able to find a limit in State law on the size of a Farm Stand, and the County Development Code otherwise provides an exemption for Ag structures of up to 3,000 square feet. Given the inherently large size of AG-II properties, we urge that farm stands of up to 3,000 square feet be allowed with Zoning Clearance.

36-6

Thank you again for the opportunity to provide these comments, and we look forward to continuing to work with you.

**From:** [Nancy Black](#)  
**To:** [Lackie, David](#)  
**Subject:** Ag Ordinance  
**Date:** Thursday, May 5, 2022 9:19:36 AM

**Caution:** This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Regarding: Agricultural Enterprise Ordinance  
Case Number: 20ORD-00000-00013 and 20ORD-00000-00014  
Project Location: Countywide on lands zoned Agricultural II (AG-II)

Hello,

I want to express my whole-hearted support for this proposed Ag Enterprise Ordinance. As a local film producer, my company has been interviewing local farmers for the Santa Barbara County Food Action Network, and I've heard firsthand how many challenges face small farmers in the County. Land access is number one on the list. And the profit margins in farming are notoriously weak, with fickle conditions and a big investment required to produce income after the crop comes in. It's a risky business.

37-1

So allowing farms and ranches to add income sources like farmstays, classes and events to supplement the cost of keeping a farm or ranch producing is a no brainer. This directly keeps farmers, especially marginalized and small farmers, in the game.

Most of the food produced in the County leaves it. And most food consumed here is brought in from elsewhere. Our local food system is weak, and creative ordinances like this help it grow stronger, as we support farmer's markets and local farmers to produce for a local market, by allowing multiple revenue streams to support them to keep farming.

Thanks for the opportunity to comment, and for your stewardship,  
Nancy

**Nancy Black**  
Cofounder, [Producer](#), Storyteller



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**From:** [Dan Kessler](#)  
**To:** [Harris, Julie](#)  
**Cc:** [ehk@kesslerhaakwine.com](mailto:ehk@kesslerhaakwine.com)  
**Subject:** Comment - AG Enterprise ORD  
**Date:** Thursday, May 5, 2022 11:59:58 AM

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Hi Julie,

In several places in the document BBQ and pizza ovens are not considered exempt from permitting. I believe they should be. Money is always tight for small farm owners. The requirement to hire a caterer or buy prepackaged food for these activities is often quite costly for the farm owner. These activities are the cheapest way to provide incidental food services. Everyone BBQ's or makes pizza in their yards. Based on the ordinance, I could make soup or cook in a dutch oven over an open fire and that would be exempt. What is the rationale for specifically calling out these activities and why aren't they exempt?

38-1

Thanks,  
Dan Kessler  
Grower/Winemaker  
Chairman Sta Rita Hills Wine Alliance  
Kessler-Haak Vineyard & Wines  
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**From:** [Ted Hamilton](#)  
**To:** [Lackie, David](#)  
**Subject:** APCD Review of Ag Enterprise Ordinance 3rd NOP  
**Date:** Thursday, May 5, 2022 3:56:18 PM

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Hi David,

Our group reviewed the 3<sup>rd</sup> NOP and Scoping Document for the Agricultural Enterprise Ordinance. No comment needed at this time. We would like to review the draft EIR when it becomes available.

39-1

Thanks!



**Ted Hamilton-Rolle**

Air Quality Specialist  
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**From:** [Nola Force](#)  
**To:** [Lackie, David](#)  
**Subject:** Comment - Ag Enterprise Ordinance - Scoping Document  
**Date:** Saturday, May 7, 2022 10:39:27 AM

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**Caution:** This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Hello, David,

In reviewing the scoping document my input has to do with keeping any "commercial" uses (stands, etc) in good repair and well maintained when viewed from streets and highways. I was active with the CA Butte County 20 year Plan allowing these uses on highways and County roads and worked with ranchers who combined crops, food stands, cattle and mining in the same property.

Thanks for your expertise and interest,

Nola

Nola D. Force

530-966-0916

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333 Old Mill Road #210

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40-1

## NATIVE AMERICAN HERITAGE COMMISSION

May 9, 2022

Julie Harris  
 Santa Barbara County Planning & Development  
 123 E. Anapamu St.  
 Santa Barbara, CA 93101

Re: 2021110353, Agricultural Enterprise Ordinance Amendments Project, Santa Barbara County

Dear Ms. Harris:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015. If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). Both SB 18 and AB 52 have tribal consultation requirements. If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.



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 Luiseño

VICE CHAIRPERSON  
 Reginald Pagaling  
 Chumash

PARLIAMENTARIAN  
 Russell Attebery  
 Karuk

SECRETARY  
 Sara Dutschke  
 Miwok

COMMISSIONER  
 William Hungary  
 Paiute/White Mountain  
 Apache

COMMISSIONER  
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 Ohlone-Costanoan

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 Yokayo Pomo, Yuki,  
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AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
  - a.** A brief description of the project.
  - b.** The lead agency contact information.
  - c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
  - d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
  
- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
  - a.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
  
- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
  - a.** Alternatives to the project.
  - b.** Recommended mitigation measures.
  - c.** Significant effects. (Pub. Resources Code §21080.3.2 (a)).
  
- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:
  - a.** Type of environmental review necessary.
  - b.** Significance of the tribal cultural resources.
  - c.** Significance of the project's impacts on tribal cultural resources.
  - d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
  
- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
  
- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
  - a.** Whether the proposed project has a significant impact on an identified tribal cultural resource.
  - b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
    - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
    - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - i.** Protecting the cultural character and integrity of the resource.
    - ii.** Protecting the traditional use of the resource.
    - iii.** Protecting the confidentiality of the resource.
  - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
  - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
  - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
  - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf).

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe. (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

#### NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

41-2

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([http://ohp.parks.ca.gov/?page\\_id=1068](http://ohp.parks.ca.gov/?page_id=1068)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
  - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
  - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
  
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
  - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
  - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
  - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:  
[Cody.Campagne@nahc.ca.gov](mailto:Cody.Campagne@nahc.ca.gov).

Sincerely,

*Cody Campagne*

Cody Campagne  
Cultural Resources Analyst

cc: State Clearinghouse

**From:** [Grundy, Farl@DOC](mailto:Grundy, Farl@DOC)  
**To:** [Lackie, David](#)  
**Cc:** [OPR State Clearinghouse](#)  
**Subject:** Comments on Ag Enterprise Ordinance Project, SCH# 2021110353  
**Date:** Friday, May 27, 2022 12:09:11 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[AgEnterpriseOrdinanceNOP.pdf](#)

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Mr. Lackie,

Attached are the Department of Conservation's comments on the Agricultural Enterprise Ordinance Revised Project, SCH# 2021110353. Please let me know if you have any problems viewing the attached pdf as a hard copy of these comments will not be sent.

Sincerely,

E-Sig-DOC-Logo



**Farl Grundy**

Associate Environmental Planner  
Division of Land Resource Protection  
Williamson Act / CEQA

**California Department of Conservation**

715 P Street, MS 1904  
Sacramento, CA, 95814  
E: [Farl.Grundy@conservation.ca.gov](mailto:Farl.Grundy@conservation.ca.gov)  
C: (916) 617-0522



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MAY 26, 2022

VIA EMAIL: [DLACKIE@COUNTYOFSB.ORG](mailto:DLACKIE@COUNTYOFSB.ORG)

David Lackie  
Long Range Planning Division  
Planning and Development Department  
123 East Anapamu Street  
Santa Barbara, CA 93101

Dear Mr. Lackie:

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE  
AGRICULTURAL ENTERPRISE ORDINANCE REVISED PROJECT, SCH# 2021110353

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Notice of Preparation of an Environmental Impact Report for the Agricultural Enterprise Ordinance Revised Project (Project). The Division monitors farmland conversion on a statewide basis, provides technical assistance regarding the Williamson Act, and administers various agricultural land conservation programs. We offer the following comments and recommendations with respect to the project's potential impacts on agricultural land and resources.

Project Description

The Agricultural Enterprise Ordinance proposes to allow a variety of uses that would be incidental to and compatible with traditional agriculture uses on land zoned AG-II. One of the uses (incidental food service) is also proposed to be allowed at wineries located on land zoned AG-I. The goal is to expand economic opportunities for farmers and improve the County's overall agricultural land viability while maintaining the function and character of the County's rural agricultural areas.

Department Comments

The conversion of agricultural land represents a permanent reduction and significant impact to California's agricultural land resources. CEQA requires that all feasible and reasonable mitigation be reviewed and applied to projects. Under CEQA, a lead agency should not approve a project if there are feasible alternatives or feasible mitigation measures available that would lessen the significant effects of the project.

All mitigation measures that are potentially feasible should be included in the project’s environmental review. A measure brought to the attention of the lead agency should not be left out unless it is infeasible based on its elements.

42-1

Consistent with CEQA Guidelines, the Department recommends the County consider agricultural conservation easements, among other measures, as potential mitigation. (See Cal. Code Regs., tit. 14, § 15370 [mitigation includes “compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements.”])

Mitigation through agricultural easements can take at least two forms: the outright purchase of easements or the donation of mitigation fees to a local, regional, or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural easements. The conversion of agricultural land should be deemed an impact of at least regional significance. Hence, the search for replacement lands should not be limited strictly to lands within the project’s surrounding area.

A helpful source for regional and statewide agricultural mitigation banks is the California Council of Land Trusts. They provide helpful insight into farmland mitigation policies and implementation strategies, including a guidebook with model policies and a model local ordinance. The guidebook can be found at:

[California Council of Land Trusts](#)

Of course, the use of conservation easements is only one form of mitigation that should be considered. Any other feasible mitigation measures should also be considered. Indeed, the recent judicial opinion in *King and Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814 (“KG Farms”) holds that agricultural conservation easements on a 1 to 1 ratio are not alone sufficient to adequately mitigate a project’s conversion of agricultural land. KG Farms does not stand for the proposition that agricultural conservation easements are irrelevant as mitigation. Rather, the holding suggests that to the extent they are considered, they may need to be applied at a greater than 1 to 1 ratio, or combined with other forms of mitigation (such as restoration of some land not currently used as farmland).

### Conclusion

The Department recommends further discussion of the following issues:

- Type, amount, and location of farmland conversion resulting directly and indirectly from implementation of the proposed project.
- Impacts on any current and future agricultural operations in the vicinity; e.g., land-use conflicts, increases in land values and taxes, loss of agricultural support infrastructure such as processing facilities, etc.

42-2

42-3

- Incremental impacts leading to cumulative impacts on agricultural land. This would include impacts from the proposed project, as well as impacts from past, current, and likely future projects.
- Proposed mitigation measures for all impacted agricultural lands within the proposed project area.
- Projects compatibility with lands within an agricultural preserve and/or enrolled in a Williamson Act contract.

42-4

42-5

Thank you for giving us the opportunity to comment on the Notice of Preparation of an Environmental Impact Report for the Agricultural Enterprise Ordinance Revised Project. Please provide this Department with notices of any future hearing dates as well as any staff reports pertaining to this project. If you have any questions regarding our comments, please contact Farl Grundy, Associate Environmental Planner via email at [Farl.Grundy@conservation.ca.gov](mailto:Farl.Grundy@conservation.ca.gov).

Sincerely,

*Monique Wilber*

Monique Wilber  
Conservation Program Support Supervisor

**From:** [Cassandra Prenn-Vasilakis](#)  
**To:** [Lackie, David](#)  
**Subject:** Public Comment - Agricultural Ordinance Amendment Project  
**Date:** Thursday, June 2, 2022 3:19:38 AM  
**Attachments:** [Public Comment - EIR Agricultural Enterprise Ordinance Amendment Project, Santa Barbara County.pdf](#)

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**Caution:** This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Mr. Lackie and the Santa Barbara County Planning and Development Department,

Thank you for inviting the public to submit comments on the scope of the environmental review analysis for the County of Santa Barbara's Agricultural Enterprise Ordinance. Thank you also for your commitment to supporting farmers and ranchers and enabling well-managed agritourism. Hipcamp appreciates this opportunity to communicate our support for the county's work on this topic. We **encourage you to consider adding small-scale incidental camping as a proposed use on lands in agricultural use that are zoned Agricultural I (AG-I)** to give landowners with smaller agricultural operations access to this opportunity to diversify revenue and stay economically viable.

43-1

Hipcamp is a platform that partners with local landowners to open up new and unique places for people to stay, camp, and get outside, enabling landowners to diversify revenue while increasing access to the outdoors and taking pressure off of public lands. Many of the landowners we work with use Hipcamp to welcome guests to working lands and engage in family-friendly agritourism. We are excited to see the County of Santa Barbara look into ways to allow compatible, incidental uses that broaden the economic base for farmers and ranchers, enabling the continuation of local agricultural operations. We support the county's tiered approach, agree that development standards, permitting requirements, and associated costs should be both proportional to the intensity of use on the property and accessible for local landowners, and ask the county to consider an expansion of scope so that more farmers and ranchers have access to this exciting opportunity.

The AG-I zone is one where many different activities - ranging from agricultural uses like orchards, grazing, and wineries to residential, recreational, and educational uses - are currently allowed with the proper permitting. Expanding the scope of the environmental review will give the county the option to allow low-intensity camping on more properties, and to then put in place the standards and permitting processes that will ensure this land use is well-managed (acreage minimums, setback requirements, site density, and maximum occupancy, for example). We've spoken to farmers in the AG-I zone who would benefit from this proposed ordinance; expanding the scope opens the door to making income diversification more accessible for small and non-conventional farmers.

43-2

Thank you again for your commitment to creating an accessible permitting pathway for incidental small-scale campgrounds and agritourism operations. By prioritizing policies that make agricultural enterprises more accessible for rural landowners, you can help protect two of Santa Barbara County's signature industries - agriculture and tourism.

Hipcamp is happy to work with county staff, supervisors, and community members as a thought-partner on this topic. Please consider us a resource and reach out if we can be supportive of this work in any way.

Thank you,  
Cassandra

--

Cassandra Prenn-Vasilakis  
Hipcamp | Government and Community Relations Manager  
Work: 415-612-8775  
She/her



DATE: June 1st, 2022

TO: David Lackie, Long Range Planning Division, Planning and Development Department

FROM: Hipcamp, Inc.

RE: Agricultural Enterprise Ordinance Amendment Project, 20ORD-00000-00013 and 20ORD-00000-00014

Dear Mr. Lackie and the Santa Barbara County Planning and Development Department,

Thank you for inviting the public to submit comments on the scope of the environmental review analysis for the County of Santa Barbara's Agricultural Enterprise Ordinance. Thank you also for your commitment to supporting farmers and ranchers and enabling well-managed agritourism. Hipcamp appreciates this opportunity to communicate our support for the county's work on this topic. We **encourage you to consider adding small-scale incidental camping as a proposed use on lands in agricultural use that are zoned Agricultural I (AG-I)** to give landowners with smaller agricultural operations access to this opportunity to diversify revenue and stay economically viable.

Hipcamp is a platform that partners with local landowners to open up new and unique places for people to stay, camp, and get outside, enabling landowners to diversify revenue while increasing access to the outdoors and taking pressure off of public lands. Many of the landowners we work with use Hipcamp to welcome guests to working lands and engage in family-friendly agritourism. We are excited to see the County of Santa Barbara look into ways to allow compatible, incidental uses that broaden the economic base for farmers and ranchers, enabling the continuation of local agricultural operations. We support the county's tiered approach, agree that development standards, permitting requirements, and associated costs should be both proportional to the intensity of use on the property and accessible for local landowners, and ask the county to consider an expansion of scope so that more farmers and ranchers have access to this exciting opportunity.

The AG-I zone is one where many different activities - ranging from agricultural uses like orchards, grazing, and wineries to residential, recreational, and educational uses - are currently allowed with the proper permitting. Expanding the scope of the environmental review will give the county the option to allow low-intensity camping on more properties, and to then put in place the standards and permitting processes that will ensure this land use is well-managed (acreage minimums, setback requirements, site density, and maximum occupancy, for example). We've spoken to farmers in the AG-I zone who would benefit from this proposed ordinance; expanding the scope opens the door to making income diversification more accessible for small and non-conventional farmers.

Thank you again for your commitment to creating an accessible permitting pathway for incidental small-scale campgrounds and agritourism operations. By prioritizing policies that

make agricultural enterprises more accessible for rural landowners, you can help protect two of Santa Barbara County's signature industries - agriculture and tourism.

Hipcamp is happy to work with county staff, supervisors, and community members as a thought-partner on this topic. Please consider us a resource and reach out if we can be supportive of this work in any way.

Thank you,  
Cassandra

Cassandra Prenn-Vasilakis  
Government and Community Relations Manager  
Hipcamp, Inc.  
[cassandra@hipcamp.com](mailto:cassandra@hipcamp.com)

**From:** [Nancy Emerson](#)  
**To:** [Harris, Julie](#)  
**Subject:** WE Watch comments on 2nd draft of AG Enterprise Ordinance - EIR Scoping  
**Date:** Thursday, June 2, 2022 8:20:34 AM  
**Attachments:** [WEWEIRScopingAgEnterpriseOrd6222.docx](#)

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Julie,

Hoping the WE Watch comments will be helpful as you and other staff work on further refinements of the Ag Enterprise Ordinance and its EIR Scoping.

Nancy E.

*WE Watch, P.O Box 830, Solvang CA93464*



June 2, 2022

TO: Julie Harris, Long Range Planning  
FROM: WE Watch, Nancy Emerson, President  
RE: Agricultural Enterprise Scoping for EIR, May 5, 2022  
Revisions

WE Watch appreciates the opportunity to comment on the May 5 revisions to the EIR Scoping Document. **We continue to urge that you have one public hearing at the Planning Commission before finalizing this document and beginning the EIR work.** “Streamlining” should not override the importance of this hearing.

44-1

We agree that it is a good idea to include Farmstays in this ordinance and hope that will mean they are no longer a separate ordinance.

The refinements and clarification of language as a result of public comments and staff revisiting the document strengthens it, e.g. pg. 6, 3.3, paragraph 1, Bullet 1, changing “small-scale” to “incidental” following “compatible” early in the document emphasizes the importance of these terms when executing the EIR. On page 13, adding 5.0 Description of Permit Types and its Table provides very useful information as a lead-in to Table 5.2.

**Right to Farm Ordinance & Ag Enterprise Ordinance.** The issue of how the Right to Farm Ordinance and the Agricultural Enterprise Ordinance relate to each other and which will be primary where any neighbor complaints are concerned needs to be addressed now so it is resolved before the EIR work begins as the Right to Farm Ordinance addresses environmental issues. This includes a question about the primacy of the State’s Right to Farm Act, particularly 3482.5, Section (a) (2) *No activity of a district agricultural association that is operated in compliance with Division 3 (commencing with Section 3001) of the Food and Agricultural Code, shall be or become a private or public nuisance due to any changed condition in or about the locality, **after it has been in operation for more than three years if it was not a nuisance at the time it began.***

44-2

Many of the uses in the Ag Enterprise Ordinance are experimental and may not be scaled up within the first 3 years of operation.

We think most of the uses in the Agricultural Enterprise Ordinance should not be protected by the Right to Farm Ordinance (exceptions being ag processing, aquaponics, composting, firewood processing, lumber processing and tree nut hulling).

Please add a sentence such as the following to the new ordinance or, if that is not possible, find another way to be sure the Right to Farm Ordinance does not apply to the uses not directly connected to agriculture in this ordinance.

“While potential land use conflicts between agriculture and residences may result from normal agricultural practices, such as noise, dust, light, and odors, the addition of supplemental, accessory agricultural enterprise uses that may create additional noise, traffic, light or other concerns will be not be protected by the Right to Farm Ordinance.”

44-2  
cont'd

### Miscellaneous EIR-Ordinance Concerns.

1. Neighborhood compatibility will be big issues for most of the uses when doing the EIR, especially when evaluating the maximum allowable size of a use. Right now it is hard to define some of the maximum sizes as “small scale” or “incidental” and even though they are “aligned with established acreage ranges in the Comprehensive Plan Land Use Element and County Zoning Ordinances” they may not be environmentally feasible.

44-3

2. It is very important that, if the EIR determines any factors are unmitigable, those limits be honored and not overridden by a ruling of “overriding considerations”. The Board of Supervisors needs to learn from its mistake with the Cannabis Land Use ordinances.

44-4

3. The fact that many of these uses are experimental makes it especially important that they be tested before being scaled up. “Small is beautiful” during this experimental period.

44-5

4. Streamlining by allowing an Exemption category emphasizes the importance of carefulness during the experimental period for this ordinance. It would be wise to allow no more than 25-30 participants in this category

44-6

unless the number of participants was exempt before this ordinance was developed.

5. Trails for hikers, bicycles and horses need to be included as part of traffic mitigation in 4.2.9 Land Use & Planning

44-7

6. When evaluating noise, one needs to include specifics in addition to amplification such as factors like wind and topography, which may increase amplification while sound barriers may modify it.

44-8

### Table 5-2 Comments

#### 1. Campgrounds.

\*Why should the # of days of camping increase from 14 to 30 days?

\*Noise from RV generators needs to be considered.

\*Should RVs and tents be separated for safety and noise reasons?

\*Maximum RV length was eliminated in this draft but does EIR need to

44-9

consider whether or not a maximum length should be stated?

\*Shouldn't water and restrooms access and water/wastewater permit be considered here? What should determine whether or not services will be required? RVs evidently need to empty wastewater weekly.

\*What about security issues if a larger number of campsites are allowed?

\*Does Campground need access to Incidental Food Service?

44-9  
cont'd

## **2. Educational Experience or Opportunity.**

\*No information was included about allowable hours of operation.

Astronomy requires nighttime use, also study of nocturnal animals.

\*We question more than 30 participants in the Exemption category.

\*Impact of potential # of attendees at individual events and total attendees per year is substantial and will need careful evaluation in EIR.

\*Do these uses need access to Incidental Food Service?

44-10

## **3. Fishing and Hunting.**

\*Is hunting currently exempt from regulation on AG-II parcels? It potentially is the most hazardous activity in the ordinance for neighbors and those using nearby roads and we question whether it should be in the Exemption category.

44-11

## **4. Horseback Riding.**

\*Thank you for allowing individuals to bring their own horses for rides.

## **5 & 6. Incidental Food Service and Small Scale Events.**

\*Will these need access to water and wastewater systems?

\*# of attendees allowed in Exemption category for Small Scale Events should be no more than 30.

\*Should any permit level allow activity more than 2 days/month?

\*What does "Events may be commercial" mean? Should other uses allow "commercial" activity?

44-12

## **6. Ag Processing & Product Preparation, Composting, Firewood, & Lumber Processing & Tree Nut Hulling**

\*We think there are strong environmental reasons for requiring that all materials originate within Santa Barbara, San Luis Obispo & Ventura Counties? Why is this not required for Composting?

44-13

**From:** [Michael Taras Jr](#)  
**To:** [Lackie, David](#)  
**Subject:** Comment - Ag Enterprise Ordinance - Scoping Document  
**Date:** Friday, June 3, 2022 3:15:10 PM  
**Attachments:** [AG Ordinance Comments.pdf](#)

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Good Afternoon David,  
Please see our comments, which are attached.

Thank You,  
Sharon and Mike Taras .

June 3, 2022

To: David Lackie, Supervising Planner  
Long Range Planning Division  
Santa Barbara County Planning and Development Department  
123 East Anapamu St.  
Santa Barbara, CA 93101  
Re: Agricultural Enterprise Ordinance

From: Sharon and Mike Taras  
5000 HWY 154  
Santa Barbara CA 93105

As the owner of an Ag-I1-100 Parcel, I am in favor of some of the activities proposed by the Agricultural Enterprise Ordinance. However, I am very concerned about noise pollution. Since these activities will bring more people to the properties, I would like the Planning Department to establish clear, enforceable standards for noise pollution that will occur during these activities and events. Any music or noise generated by these activities should not be able to be heard by adjacent property owners from their property lines. We are sensitive to this issue because we can hear the music from the Live Oak Camp on Highway 154 all the way back to our house site. This music continues well after 11 PM. Just as noise pollution is harmful to humans, it also effects wildlife. Quiet enjoyment of property and home is of utmost importance, so when noise pollution is added into the background of an otherwise quiet natural area, the soft sounds of nature are lost.

45-1

Regarding traffic on Hwy.154: The small number of large farms located on Highway 154 affected by these ordinances would bring an insignificant amount of traffic on that road compared to the amount of traffic generated on this highway by Wineries and Homestays located in Santa Ynez, Los Olivos and Solvang.

Why is the County holding up the Inland Area Farmstay Ordinance again, by grouping it in with totally different proposed activities? I have no objection, except it prevents people from operating a Farmstay to make additional revenue as soon as possible. A Farmstay, with its limited number of occupants, is controllable by the County and owners are required to pay TOT. Some of the other activities proposed will be harder to regulate. Who will stop the event holder from exceeding the allowed number of attendees or from holding more events than allowed? Farmstays allowed in the main residence do not cause all of the EIR issues that campgrounds and special events trigger. Each proposed activity could need its own EIR. How long will that take? If included in the Agricultural Enterprise Ordinance, Farmstays, in the main residence (similar to the Coastal Farmstay Ordinance) should be put in a separate category and passed immediately.

45-2

In addition to the activities proposed by the Agriculture Enterprise Ordinance, Homestays should be added to the list. The County has completely ignored AG II properties that do not have established commercial farms. These people are not eligible for a Farmstay, and are also not eligible for a Homestay. Homestays were granted to Inland Area Residential, as well as AG I properties. These properties are smaller than AG II and benefit financially from the Homestay. The AG II properties not in the Williamson Act, are not getting a benefit from reduced taxes, and support the County with a lot of tax dollars. These folks have been ignored by the County for too long and receive no support to help them meet their financial burden. Homestays, as a minimum, must certainly be granted to AG II properties that do not raise crops commercially or do not meet the requirements for a Farmstay. This issue should have been included in the Short- Term Rental Ordinance. Since it was not, it must be addressed here or enacted immediately as an Amendment to that Ordinance. Thank you for your consideration of these issues.

45-3

Respectfully yours,  
Sharon & Michael Taras

**APPENDIX B**  
**DRAFT UNIFORM RULES PROPOSED FARMSTAY**  
**AMENDMENTS**





COUNTY OF SANTA BARBARA

Planning and Development

**Proposed Farmstay Amendment (Rule 2-5)**

**Santa Barbara County  
Uniform Rules for  
Agricultural Preserves and  
Farmland Security Zones**



**Published June 2021**

123 East Anapamu Street  
Santa Barbara, CA 93101  
805.568.2000

624 West Foster Road, Suite C  
Santa Maria, CA 93455  
805.934.6250

## Uniform Rules for Agricultural Preserves and Farmland Security Zones

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### NOTES:

The Santa Barbara County Uniform Rules for Agricultural Preserves and Farmland Security Zones were approved by the Board of Supervisors on September 25, 2007 by Resolution 07-193.

This document is updated on a periodic basis in order to include amendments adopted by the Board of Supervisors. Recently adopted amendments may not yet be incorporated into this copy. Please check with the Planning and Development Department Zoning Information Counter located at either 123 East Anapamu Street, Santa Barbara, or 624 West Foster Road, Suite C, Santa Maria, for information on amendments approved subsequent to the date shown on the front of this publication.

### September 2014 Republished

The Uniform Rules for Agricultural Preserves and Farmland Security Zones was republished in September 2014 to reflect revisions resulting from the adoption of the following resolution by the Board of Supervisors in July 2014 and to resolve formatting issues.

Resolution No.	Case No.	Date of Adoption	Subject
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The Uniform Rules for Agricultural Preserves and Farmland Security Zones was republished in May 2018 to reflect revisions resulting from the adoption of the following resolution by the Board of Supervisors in May 2018 and to resolve formatting issues.

Resolution No.	Case No.	Date of Adoption	Subject
18-102	17ORD-00000-00019	05-01-2018	Cannabis

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The Uniform Rules for Agricultural Preserves and Farmland Security Zones was republished in August 2018 to reflect revisions resulting from the adoption of the following resolution by the Board of Supervisors in August 2018 and to resolve formatting issues.

Resolution No.	Case No.	Date of Adoption	Subject
18-211	-	08-14-2018	Accessory Dwelling Units

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The Uniform Rules for Agricultural Preserves and Farmland Security Zones was republished in June 2021 to reflect revisions resulting from the adoption of the following resolution by the Board of Supervisors in May 2021 and to resolve formatting issues.

Resolution No.	Case No.	Date of Adoption	Subject
21-102	-	05-18-2021	Accessory Dwelling Units

**TABLE OF CONTENTS**

	<b>Page</b>
<b>INTRODUCTION</b> .....	<b>1</b>
<b>UNIFORM RULE 1</b> .....	<b>11</b>
<b>1-1. INTRODUCTION</b> .....	11
<b>1-2. ELIGIBILITY REQUIREMENTS</b> .....	12
<b>1-2.1. Comprehensive Plan and Zoning Requirements</b> .....	12
<b>1-2.2. Minimum Preserve and Contract Size</b> .....	12
<b>1-2.3. Commercial Production and Reporting Requirements</b> .....	15
<b>1-2.4. Adjustments to Parcels and Zoning</b> .....	17
<b>1-3. LOT LINE ADJUSTMENTS</b> .....	17
<b>1-4. PERMITTED RESIDENTIAL LAND USES</b> .....	18
<b>1-4.1. Principal Dwelling</b> .....	19
<b>1-4.2. Residential Agricultural Unit</b> .....	21
<b>1-4.3. Agricultural Employee Housing</b> .....	21
<b>1-4.4. Accessory Dwelling Unit and Junior Accessory Dwelling Unit</b> .....	22
<b>UNIFORM RULE 2</b> .....	<b>23</b>
<b>2-1. COMPATIBILITY GUIDELINES</b> .....	23
<b>2-1.2. Other Compatibility Criteria</b> .....	24
<b>2-2. SUPPORTIVE AGRICULTURAL USES</b> .....	24
<b>2-2.1. Preparation and Processing</b> .....	25
<b>2-2.2. Retail Sales</b> .....	27
<b>2-3. ANIMAL BOARDING AND BREEDING FACILITIES</b> .....	27
<b>2-3.1. Incidental Boarding and Breeding</b> .....	27
<b>2-3.2. Principal Boarding and Breeding</b> .....	28
<b>2-4. RECREATION</b> .....	29
<b>2-5. RESERVED FOR FUTURE USE</b> .....	29
<b>2-7. WASTE DISPOSAL AND COMMERCIAL COMPOSTING FACILITIES</b> .....	30
<b>2-8. MINING EXTRACTION AND QUARRYING</b> .....	31
<b>2-9. GAS, ELECTRIC, WATER, AND COMMUNICATION FACILITIES</b> .....	32
<b>2-10. OIL AND GAS DRILLING AND PRODUCTION FACILITIES</b> .....	32
<b>2-11. TEMPORARY FILMING AND SPECIAL EVENTS</b> .....	33
<b>UNIFORM RULE 3</b> .....	<b>34</b>
<b>3-1. ELIGIBILITY REQUIREMENTS</b> .....	34
<b>3-1.1. Character of Land</b> .....	34
<b>3-1.2. Comprehensive Plan and Zoning Requirements</b> .....	34
<b>3-1.3. Minimum Contract Size</b> .....	34
<b>3-2. COMPATIBLE LAND USES</b> .....	35

<b>3-3. INCOMPATIBLE LAND USES</b> .....	35
<b>3-4. MAINTENANCE OF THE LAND</b> .....	35
<b>UNIFORM RULE 4</b> .....	<b>36</b>
<b>4-1. ELIGIBILITY REQUIREMENTS</b> .....	36
<b>4-1.1. Comprehensive Plan and Zoning Requirements</b> .....	36
<b>4-1.2. Minimum Contract Size</b> .....	36
<b>4-2. SUBMITTAL REQUIREMENTS</b> .....	36
<b>4-3. COMPATIBLE LAND USES</b> .....	37
<b>4-4. INCOMPATIBLE LAND USES</b> .....	37
<b>4-5. MAINTENANCE OF THE LAND</b> .....	37
<b>UNIFORM RULE 5</b> .....	<b>38</b>
<b>5-1. ELIGIBILITY REQUIREMENTS</b> .....	38
<b>5-2. CONTRACT TERMS</b> .....	39
<b>5-2.1. Term</b> .....	39
<b>5-2.2. Permitted Residential Land Uses</b> .....	39
<b>5-2.3. Compatible Land Uses</b> .....	39
<b>5-3. CONTRACT TERMINATION</b> .....	39
<b>5-4. TRANSFER OF OWNERSHIP</b> .....	39
<b>5-5. LAND DIVISION AND LOT LINE ADJUSTMENTS</b> .....	39
<b>UNIFORM RULE 6</b> .....	<b>42</b>
<b>6-1. CONTRACT TERMINATION</b> .....	42
<b>6-1.1. Nonrenewal (Unilateral notice by landowner or County)</b> .....	42
<b>6-1.2. Cancellation</b> .....	42
<b>6-1.3. Rescission</b> .....	46
<b>6-1.4. Annexation by City</b> .....	47
<b>6-1.5. Eminent Domain or Other Acquisition</b> .....	47
<b>6-1.6. Termination of Multiple Contract Preserves</b> .....	48
<b>6-1.7. Monitoring and Enforcement</b> .....	48
<b>6-2. TRANSFER OF OWNERSHIP OF CONTRACTED LAND</b> .....	48

## **INTRODUCTION**

### **PURPOSE OF AGRICULTURAL PRESERVE PROGRAM AND UNIFORM RULES**

The *Santa Barbara County Uniform Rules for Agricultural Preserves and Farmland Security Zones* (hereafter referred to in this document as Uniform Rules or Rules) is the set of rules by which the County administers its Agricultural Preserve Program under the California Land Conservation Act of 1965, better known as the Williamson Act. The purpose of the Williamson Act is the long-term conservation of agricultural and open space lands. The Act establishes a program to enroll land in Williamson Act or Farmland Security Zone contracts whereby the land is enforceably restricted to agricultural, open space, or recreational uses in exchange for reduced property tax assessments. Participation in the program is voluntary by the County and by the eligible landowners.

The Act requires that each participating local government have a set of uniform rules for administering Williamson Act and Farmland Security Zone contracts within its jurisdiction. The County's Uniform Rules establish the basic requirements of all contracts and are incorporated as a part of each contract. As a part of every contract, therefore, any change in the County's Rules applies to every contract currently in effect with the exception of rules specifically applied prospectively and those compatible uses permitted under Section 51238.3 of the Williamson Act.

Conservation of agricultural and open space land benefits the general public by discouraging premature conversion of land to urban land uses, thereby curtailing sprawl and promoting logical urban growth and provision of urban services. The Agricultural Preserve Program both protects agriculture and retains open space for its scenic qualities and value as wildlife habitat. Most directly, it contributes to the state's agricultural economy and the availability of fresh, nutritious, varied and affordable food. To ensure the long-term retention of these benefits, land enrolled in the program is prevented from being readily converted to urban or other non-agricultural uses. This is achieved by the County through conscientious and consistent enforcement of the Uniform Rules and the terms of the contracts, which also maintains the constitutionality of administering preferential property tax assessments for these lands.

#### **I. AGRICULTURAL PRESERVES AND WILLIAMSON ACT CONTRACTS**

As a participating county, the Williamson Act mandates that areas of the County be designated as agricultural preserves for application of the program. Land within the preserves that meets the eligibility requirements may enroll in the Agricultural Preserve Program through a Williamson Act or Farmland Security Zone contract with the County. It is Santa Barbara County's practice to establish the preserves simultaneously with enrollment in a contract, resulting in coterminous boundaries between the preserves and the contracts. Thus land anywhere within the County that meets the zoning, size, use and other requirements set forth in these Rules may be eligible to participate in the program.

Farmland Security Zone contracts, also referred to as "Super-Williamson Act contracts" are a special type of Williamson Act contract that receive greater tax benefits (35 percent reduction from assessed Williamson Act or Proposition 13 value) in exchange for longer contracts. In Santa Barbara County, the Farmland Security Zone program is not yet widely used. For this reason, these Uniform Rules refer primarily to Williamson Act contracts when discussing eligibility requirements, compatible uses, and

contract termination provisions. However, in most cases the requirements are the same for both Williamson Act and Farmland Security Zone contracts. Therefore, whenever these Rules mention Williamson Act contracts, it shall be presumed to include Farmland Security Zone contracts as well, unless specifically stated otherwise. Requirements specific to Farmland Security Zones are discussed in Rule 5.

Under the Act, contracts are automatically renewed each year following the first year of a 10-year Williamson Act contract (or 20 years for Farmland Security Zones), unless the owner or County serves a notice of nonrenewal or the contract is terminated as may be provided for by the Act and these Rules. When the County or a landowner serves a notice of nonrenewal upon the other party sufficiently prior to the renewal date (i.e. 90 days if served by the landowner, 60 days if served by the County), the contracted land must continue to meet County eligibility and compatible use requirements throughout the remaining duration of the 10-year or 20-year contract. For example, if a landowner non-renews a Williamson Act contract in September of 2006, the contract remains in effect for nine years from the start of the next calendar year (e.g. January 1, 2007). Therefore the contract would expire at the end of 2015.

## **II. CONTRACTS - ASSESSED VALUE OF LAND, IMPROVEMENTS AND LIVING IMPROVEMENTS**

The State Legislature enacted the California Land Conservation Act (Williamson Act) in 1965, with the intent of preserving agricultural lands for food and fiber production. At the time, property taxes were recalculated yearly, on the basis of market value. The Williamson Act changed this practice for open space and agricultural lands. With California taxpayer approval, the law prescribed specific methods for appraising properties under the Williamson Act. The Legislature determined that the assessed value of the agricultural use would be calculated based on the income approach to value, rather than the market approach. Adopting the Williamson Act was an effort to motivate landowners towards the goal of the program. It was *“an attempt to stop or at least slow down increases in real property taxes on farmland by providing methods for restricting land to agricultural purposes.”*<sup>1</sup>

### **Presumptions for Williamson Act Valuation Today**

The spirit and intent of the Williamson Act remain today under Proposition 13. Foremost in the appraisal process is the presumption that the agricultural (restricted) use of the land will continue into the foreseeable future and that the restrictions affect value. The non-restricted uses are valued at their market value, in accordance with Proposition 13.

### **Valuation Procedures for Enforceably Restricted Property**

The basic appraisal method for Williamson Act valuation is by the income approach to value. The assessor capitalizes all income attributed to the agricultural use of the land, (along with income from compatible uses such as radio towers, television repeaters, cell sites, commercial enterprises, the sale of water, mineral exploration leases, production contracts and recreation) into an indication of value. The assessor also capitalizes income produced from living improvements (fruit and nut bearing trees and vines) into an indication of value. The land and living improvement values comprise the restricted portion of the total assessment.

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<sup>1</sup> SBE Assessment of Agricultural and Open Space Properties, AH521 II-1.

Under the 1999 Farmland Security Zone Act, landowners that enter into a 20-year Farmland Security Zone contract can benefit from an additional 35 percent reduction on the restricted portion of their assessment.

### **Valuation Procedures for Unrestricted Property**

Non-restricted portions of the contracted property are valued at their market value, in accordance with Proposition 13. For example, residences and residential home sites are expressly excluded from the restricted calculation. If a 100-acre avocado ranch has a home with garage, pool, tennis court, guesthouse and an employee house, each home site and each of the structures will be assessed at market (Proposition 13) value. Any physical changes associated with the residential uses, such as driveways, grading, landscaping, domestic wells, etc. are also assessed at market value.

### **Total Assessed Value**

Each year the assessor sums the restricted and unrestricted values to calculate the final Williamson Act or Farmland Security Zone value for the contracted property. The Assessor also calculates the Proposition 13 base value and the current market value. The value placed on the tax roll will be the lesser of: 1) the Williamson Act value or Farmland Security Zone value, 2) the Proposition 13 base value, factored, or 3) the current market value.

## **IV. RELATIONSHIP OF PROGRAM TO OTHER LAND USE REQUIREMENTS**

The Uniform Rules implement the Williamson Act by defining eligibility requirements and compatible uses which each participating landowner must adhere to in order to receive a reduced tax assessment. The Uniform Rules do not authorize any development on agricultural land that is not otherwise permitted by the applicable zone district. Often the Rules are more restrictive than the underlying agricultural zoning requirements. However, the Rules do not supersede the County's land use requirements contained in the Comprehensive Plan and zoning ordinances, nor obviate the need for permits. The Agricultural Preserve Advisory Committee (APAC) is responsible for reviewing a land use application for consistency with the Uniform Rules and the Williamson Act, but does not make a decision on the permit. The land use permit must be reviewed and approved by the appropriate decision-maker in the permit process.

A landowner can obtain an early indication whether or not a proposed land use or activity may be allowed by bringing their proposal to the Agricultural Preserve Advisory Committee (APAC) for advisory review and by consulting with Planning and Development or submitting a pre-application to the County for any required permits.

## **V. AGRICULTURE AND URBAN INTERFACE**

The Board of Supervisors recognizes not only agriculture's contribution to the County but also its vulnerability to conversion to urban or other non-agricultural uses. In addition to the Agricultural Preserve Program, goals and policies in the County's Land Use and Agricultural Elements afford protection to both prime and nonprime agricultural lands. This includes protection from urban expansion and urban influences. It is important to reaffirm these policies here in the Uniform Rules. Two primary considerations regarding the interface of agricultural and urban lands are:

1. Agriculture does not ordinarily require urban services such as sanitary sewers, transit and lighting, and therefore such service districts should not be extended to cover agricultural land in, or eligible for inclusion in agricultural preserves. Taxing agriculturists for these services may impose an unnecessary tax burden and could hasten conversion to urban land uses.
2. To deter expansion of urban areas onto productive agricultural lands, the County encourages the entry of prime and producing agricultural lands adjoining urban areas into the Agricultural Preserve Program.

## **VI. ROLE OF THE APAC**

The Agricultural Preserve Advisory Committee was created by, and is advisory to, the Board of Supervisors and includes representatives from the Agricultural Commissioner's Office, Assessor's Office, County Surveyor's Office, Cooperative Extension, Planning and Development and the agricultural community. The Committee is responsible for administering the County's Agricultural Preserve Program and the Uniform Rules. Its duties include reviewing applications and making recommendations for creating agricultural preserves, entering new contracts, making revisions to existing preserves or contracts, terminating contracts and disestablishing preserves. In conjunction with these duties, the APAC is responsible for monitoring and enforcement of the Agricultural Preserve Program. When an application for a permit (or other County entitlement) involves land in a Williamson Act contract, the APAC has the responsibility to review the application to determine its consistency with the County's Uniform Rules. In addition, the APAC is responsible for determining the compatibility of land uses under the provisions of the Uniform Rules and the Williamson Act. From time to time it is also responsible for recommending revisions to the Rules to ensure their continuing consistency with the Williamson Act and suitability to Santa Barbara County. The APAC is a committee subject to the Ralph M. Brown Act and the public is welcome to attend meetings and provide input and comments on proposed recommendations or issues being discussed.

## DEFINITIONS

Some of the terms defined below are taken directly from the Williamson Act. The definitions in the Williamson Act (WA) may be amended from time to time by the state legislature. Any changes made to the Act's definitions will supersede the definitions included in these Rules. Other terms are taken directly from County zoning ordinance (Santa Barbara County Code Chapter 35, Zoning). Those definitions are also subject to change in response to future zoning ordinance amendments. In some cases, definitions are derived from County zoning ordinances or the Williamson Act but have been tailored to the requirements of the County's Agricultural Preserve Program and may be more restrictive than the zoning ordinances or the Williamson Act. Lastly, there are those definitions which have been developed specifically for the purposes of these Rules.

**Accessory dwelling unit:** An attached or a detached residential dwelling unit that is located on the same parcel as a single-family or multiple-family dwelling to which the accessory dwelling unit is accessory and (1) provides complete independent living facilities for one or more persons including permanent provisions for cooking, eating, living, sanitation, and sleeping, and (2) provides interior access between all habitable rooms. An accessory dwelling unit may also include an efficiency unit, as defined in Section 17958.1 Health and Safety Code, and a manufactured home, as defined in Section 18007 of the Health and Safety Code.

1. **Attached accessory dwelling unit.** An accessory dwelling unit that shares a common wall with the principal dwelling or an attached accessory structure.
2. **Detached accessory dwelling unit.** An accessory dwelling unit that is detached from the principal dwelling and is located on the same lot as the principal dwelling. A detached accessory dwelling unit may be attached to a detached accessory structure (derived from the Santa Barbara County Code, Chapter 35, Zoning).

**Agricultural commodity:** Any and all plant and animal products produced within the County for commercial purposes.

**Agricultural employee:** A person who primarily works or is engaged in agriculture.

**Agricultural preserve:** An area of contracted land devoted to either agricultural use, recreational use, or open space use, as herein defined, or any combination of those uses and which is established in accordance with the provisions of the Williamson Act and these Rules (derived from WA).

**Agricultural use:** The use of land for the purpose of producing an agricultural commodity for commercial purposes (WA). For the purposes of these Uniform Rules, commercial cannabis cultivation is considered an agricultural use.

**Cannabis:** All parts of the plant *Cannabis sativa Linnaeus*, *Cannabis indica*, or *Cannabis ruderalis*, or any other strain or varietal of the genus *Cannabis* that may exist or hereafter be discovered or developed that has psychoactive or medicinal properties, whether growing or not, including the seeds thereof, the resin whether crude or purified, extracted from any part of the plant and every compound, manufacture, salt, derivative, mixture, or preparation of the plant, its seeds, or resin. "Cannabis" also means marijuana. For the purpose of these Rules, "cannabis" does not mean "industrial hemp" as defined by Section 81000 of the Food and Agricultural Code or Section 11018.5 of the Health and Safety Code.

**Cannabis product:** Cannabis that has undergone a process whereby the plant material has been transformed into a concentrate, including, but not limited to, concentrated cannabis, or an edible, or topical product containing cannabis or concentrate cannabis and other ingredients.

**Cancellation:** The immediate removal from contract of a parcel or premises under Williamson Act or Farmland Security Zone contract.

**Commercial:** Any activity or operation involving compensation or remuneration for its products or services.

**Commercial composting facility:** A commercial facility that is operated for the purpose of producing compost from the onsite and/or offsite organic material fraction of the waste stream and is permitted, designed, and operated in compliance with the applicable regulations contained in the California Code of Regulations, Title 14, Division 7, as may be amended from time to time. Non-commercial composting that is part of an agricultural operation is not included within this definition (derived from the Santa Barbara County Code, Chapter 35, Zoning).

**Contiguous:** Property shall be considered to be contiguous for the purposes of these Uniform Rules if two or more properties are adjoining, touch at a point or share a common boundary, or are separated by a road, street, utility easement, railroad right-of-way or other public facility so long as the property is owned in common and can reasonably be operated as a single agricultural unit (derived from Subdivision Map Act).

**Contract:** The legal document that binds the parties under the terms of the Williamson Act and these Rules.

**Contracted land:** Land under either a Williamson Act or Farmland Security Zone contract; used generally to refer to all land in the County enrolled in the Agricultural Preserve Program.

**Development envelope:** The area of land in an agricultural preserve within which all residential, residential accessory structures, and other structures and uses not associated with the commercial agricultural operation, including landscaping and access to the buildings or structures, are located. Examples of such structures include, but are not limited to, guest houses, non-agricultural roads, and personal horse stables. Septic systems would be included in this development envelope if they take land out of agricultural production.

**Fully planted:** In conjunction with prime and superprime land, land devoted to active crop production, excluding both agricultural and non-agricultural buildings and structures as well as non-producing land. Fully planted land does not include: diseased or otherwise previously producing land which is not currently producing an adequate income for qualification as prime or superprime land; unplanted easements or unplanted setbacks; driveways and roads; waterways, wetlands and other terrain features that will not support commercial agricultural production.

**Guest ranch:** Agricultural tourism that provides accommodation to paying guests incidental to or in conjunction with the principal commercial agricultural operation (derived from Santa Barbara County Code Chapter 35, Zoning).

**Guest house:** Detached living quarters of a permanent type of construction without kitchen or cooking facilities of any kind, intended and used primarily for temporary guests of the occupants of the main building on the parcel on which such guest house is located, and not rented or otherwise used as a

separate dwelling (Santa Barbara County Code Chapter 35, Zoning).

**Historic structure:** A structure that was built on or moved onto land prior to the land being placed under a Williamson Act contract and meets the requirements of the Cultural Resource Guidelines Historical Resources Element for a historic structure.

**Immediate family:** The spouse of the landowner, the natural or adopted children of the landowner, the parents of the landowner, the siblings of the landowner, or the grandchildren of the landowner.

**Junior accessory dwelling unit:** A residential dwelling unit that is no more than 500 gross square feet in size and contained entirely within a one-family dwelling. A junior accessory dwelling unit may include separate sanitation facilities, or may share sanitation facilities with the existing structure.

**Land reclamation fill:** Fill consisting of solid materials or soil that is non-toxic, noncombustible, non-organic and not hazardous, and which is used as fill to contour existing uneven terrain for the purpose of reclaiming land for agricultural use (County Grading Ordinance).

**Managed wetland area:** An area, which may be an area diked off from the ocean or any bay, river or stream to which water is occasionally admitted, and which, for at least three consecutive years immediately prior to being placed within an agricultural preserve pursuant to these Rules, was used and maintained as a waterfowl hunting preserve or game refuge or for agricultural purposes (WA).

**Multiple contract preserve:** The situation whereby two or more contiguous prime and/or superprime premises, none of which qualify independently as an agricultural preserve, are combined to meet the minimum preserve size of 40 acres; each ownership remains under a separate contract, but each ownership's continuing individual eligibility depends on remaining within a minimum 40-acre block of contracted land.

**Nonprime land:** land that is not prime (or superprime). This may include, but is not limited to, land used for grazing or dry farming (derived from WA).

**Nonrenewal:** Withdrawal of land under contract whereby the contract remains in effect for the remainder of the term of the contract (i.e. nine years for a Williamson Act contract or 19 years for a Farmland Security Zone contract).

**Notification of Assumption of Williamson Act Contract:** When all the land under a single contract is transferred to a new owner and no changes to contract boundaries result, the new owner shall assume the original contract and all of the requirements therein, and submit to the County such a notification.

**Open space use:** The use or maintenance of land in a manner that preserves its natural characteristics, beauty, or openness for the benefit and enjoyment of the public, to provide essential habitat for wildlife, if the land is within a scenic highway corridor, a wildlife habitat area, a saltpond, a managed wetland area, or a submerged area, as these terms are herein defined in these Rules (derived from WA).

**Parcel:** A single parcel of land in one ownership, the boundaries of which are delineated in the latest recorded parcel map, subdivision map, or Certificate of Compliance recorded in the County Recorder's Office or deed provided that such recorded deed does not create or attempt to create a parcel in violation of the provisions of any applicable California law or County ordinance (Santa Barbara County Code Chapter 35, Zoning); also referred to as legal parcel. Unless otherwise specified, the gross acreage of the parcel is considered to be the parcel size.

**Premises:** The area of land under a single Williamson Act or Farmland Security Zone contract; the premises may comprise a single legal parcel or multiple contiguous legal parcels under the same ownership.

**Prime land:** means any of the following:

1. All land that qualifies for rating as class I or class II in the Natural Resource Conservation Service land use capability classifications.
2. Land which qualifies for rating 80 through 100 in the Storie Index Rating.
3. Land which supports livestock used for the production of food and fiber and which has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the United States Department of Agriculture.
4. Land planted with fruit- or nut-bearing trees, vines, bushes or crops which have a nonbearing period of less than five years and which will normally return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than five hundred dollars (\$500) per acre.
5. Land which has returned from production of unprocessed agricultural plant products an annual gross value of not less than five hundred dollars (\$500) per acres for three of the previous five years, except that for irrigated pasture this figure will be two hundred dollars (\$200) per acre for three of the previous five years(derived from WA).
6. In all cases, prime land must have a secure water source adequate to support the agriculture on the premises.
7. Superprime land is a subset of prime land - see definition.

**Principal dwelling:** A dwelling serving as the primary inhabited structure.

**Recreational use:** The use of the land in its agricultural or natural state by the public, with or without charge, for any of the following: walking, hiking, picnicking, wilderness camping, scenic viewing, swimming, boating, fishing, hunting, horseback riding or other similar low intensity recreational activities (derived from WA).

**Replacement contract:** A contract that is required when the boundaries or principal uses (i.e. Agriculture, Open Space, or Recreation) of the original contract are changed.

**Rescission:** The process of simultaneously voiding an existing contract and entering into a new contract where there is no reduction in the amount of land under contract.

**Residential Agricultural Unit (RAU):** An attached or detached single family dwelling unit on a permanent foundation located in the AG-I-40, AG-II-40, AG-II-100, and AG-II-320 zone districts, or a detached duplex on a permanent foundation located in the AG-II-320 zone district, which provides complete, independent living facilities for one or more persons in addition to a principal one-family dwelling. A RAU shall not be sold, transferred, or financed separately from the principal structure, but may be rented or leased on a non-exclusive basis. It shall include permanent provisions for living, sleeping, eating, cooking, and sanitation, and shall be located entirely on the same parcel that contains

the principal dwelling (Santa Barbara County Code Chapter 35, Zoning).

**Submerged area:** Any land determined by the Board of Supervisors to be submerged or subject to tidal action and found by the Board to be of great value to the state as open space (WA).

**Superprime land:** Prime agricultural lands of the County south of the Santa Ynez Mountains and east of Gaviota Pass which are highly productive due to the combination of soils and climate that are uniquely suitable to specialty horticultural produce and floral varieties, and that are capable of supporting commercially viable agricultural operations on parcels as small as five acres. Superprime land is a subset of prime land and can be combined with either prime contracts or other superprime contracts to form a prime preserve of at least 40 acres. In order to qualify, it must meet specific production requirements that are different than regular prime land, as outlined in Section 1-2.3 and Table 1-2 of these Rules.

**Wildlife habitat area:** A land or water area designated by the Board of Supervisors, after consulting with and considering the recommendation of the Department of Fish and Game, as an area of great importance for the protection or enhancement of the wildlife resources of the state (WA).

**Winery:** A bonded establishment primarily used for the purpose of processing grapes or other fruit products. Processing includes, but is not limited to, crushing, fermenting, blending, aging, storage, bottling, and wholesale/retail sales (Santa Barbara County Code Chapter 35, Zoning).

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# UNIFORM RULE 1

## Requirements for Agricultural Preserves, and Williamson Act and Farmland Security Zone Contracts

*Adopted August 9, 1971; amended by Resolution Nos. 73-28 (January 15, 1973), 74-84 (February 4, 1974), 74-344 (May 13, 1974), 75-825 (October 27, 1975), 76-29 (January 12, 1976), 78-466A (October 30, 1978), 84-464 (October 8, 1984), 99-268 (July 6, 1999), 07-193 (September 25, 2007)*

### 1-1. INTRODUCTION

The Williamson Act establishes certain minimum requirements and encourages participating local governments to establish requirements (which may be stricter than the Act but not more lenient) to tailor the program to better reflect local characteristics and objectives. This Rule sets out the County's criteria to be used in judging the qualifications of parcels for the creation and continuance of Agricultural Preserves and Williamson Act contracts, under the terms of the California Land Conservation Act of 1965 and these Rules, both as amended or to be amended. It includes such requirements as zoning, minimum preserve size, minimum parcel size, and agricultural production.

The signing of the Williamson Act contract and the adoption of the resolution creating the Agricultural Preserve shall be completed concurrently for all proposals.

As mentioned in the Introduction to these Rules, because Farmland Security Zone contracts are similar to Williamson Act contracts in terms of eligibility requirements and compatible uses, references to Williamson Act contracts in this Rule shall be presumed to include Farmland Security Zone contracts as well, unless specifically stated otherwise. Additional eligibility requirements specific to Farmland Security Zones are discussed in Rule 5.

#### 1-1.1 County Objectives

In determining initial and ongoing eligibility or reviewing related proposals, the Agricultural Preserve Advisory Committee shall take into consideration the following objectives of the County:

##### A. Commercial Agricultural Production

Land eligible for inclusion in the Agricultural Preserve Program shall be used principally for the commercial production of agricultural commodities. Lands not used for commercial agricultural production, but desirable for preservation, may qualify for inclusion in the program as preserves for recreational or open space use.

##### B. Land Quality

The quality of agricultural land varies widely, depending on soil, terrain, water availability, climate, and other factors. The County wishes to protect the maximum amount of productive and potentially productive agricultural land, which can be either prime or nonprime land.

## 1-2. ELIGIBILITY REQUIREMENTS

In order to enter land into a Williamson Act contract or amend an existing contract, and maintain continued eligibility during the life of the contract, land must meet all of the applicable requirements identified in this Rule.

Only whole, legally created and recorded parcels shall be accepted in an agricultural preserve. Where a landowner applies to enroll their entire contiguous landholding in a single contract, and the landholding complies with these rules, the landowner shall not be required to provide a certificate of compliance or other evidence that the landholding is a legally created parcel or parcels. Documentation of parcel validity will be required should the landowner make a request for development on the parcel or parcels.

### 1-2.1. Comprehensive Plan and Zoning Requirements

Eligible land shall have land use and zoning designations consistent with those listed in Table 1-1.

**Table 1-1. Comprehensive Plan and Zoning Requirements**

Contract Type	Comprehensive Plan Designation	Zone Districts
Agriculture and Recreation	Agricultural Commercial, Agriculture I, Agriculture II, and Mountainous Area	Agriculture, Mountainous, and Resource Management
Open Space	Agricultural Commercial, Agriculture I, Agriculture II, Mountainous Area, and Other Open Lands	Agriculture, Mountainous, and Resource Management

The zoning designation shall include a minimum parcel size consistent with the provisions of Section 1-2.2 (e.g., AG-I-40 or MT-GOL-40 for a prime preserve or AG-II-100 or MT-TORO-100 for a nonprime preserve). The AG-I-5 zoning district may be used or applied only in conjunction with the provisions of Subsection 1-2.2.C.3, Superprime Land.

Interested landowners with ineligible land use or zoning designations should request and secure a general plan amendment and/or rezone prior to or concurrent with the processing of the agricultural preserve and Williamson Act contract, subject to the provisions outlined in Section 1-2.4. Land zoned under Ordinance 661 is not eligible for a Williamson Act contract unless the application is accompanied by a general plan amendment, rezone, or consistency rezone request.

### 1-2.2. Minimum Preserve and Contract Size

#### A. Preserve Size

Except as provided for in Subsection C.4 below, the minimum size for an agricultural preserve comprising nonprime land shall be 100 acres and the minimum size for an agricultural preserve comprising prime or superprime land shall be 40 acres.

#### B. Existing and Assumed Contracts

Existing prime and nonprime contracts for which no changes are proposed that meet the minimum preserve size, but which are made up of parcels which do not meet the minimum parcel size set forth in Subsection 1-2.2.C below, shall continue to be eligible with respect to minimum preserve and contract size. The assumption of an existing contract shall also continue to be eligible with respect to minimum preserve and contract size, assuming no changes to contract boundaries occur.

If the owner of an existing or assumed contract proposes a change to the contract (e.g. changing the contract boundary or obtaining a permit for development) then the contract would need to adhere to all of the eligibility requirements contained in Section 1-2.2 of this Rule.

### **C. New and Replacement Contracts**

Applications for new or replacement contracts shall be considered for land if its size and type are one of the following:

#### **1. Nonprime Land**

When the land is classified as nonprime, the minimum preserve size is 100 acres under single ownership.

#### **2. Prime Land**

When the land is classified as prime, as defined in these Rules, the preserve can be made up of either of the following:

- a. A single parcel contract of at least 40 acres in size; or
- b. Two or more contiguous parcels (under one or more contracts) which total at least 40 acres, when each parcel (and contract where applicable) is either:
  - (1) A minimum of 20 acres; or
  - (2) A minimum of five acres of superprime land as defined in Subsection C.3 below; or
  - (3) A combination of (1) and (2) above.

Subsections (1) through (3) above apply when contract applications for an aggregate preserve of 40 acres or more are concurrently processed or when a new contract for less than 40 acres is added to other contracts in an existing prime preserve.

#### **3. Superprime Land**

Prime agricultural lands of the County south of the Santa Ynez Mountains and east of the Gaviota Pass which are highly productive due to the combination of soils and climate are uniquely suitable to specialty horticultural produce and floral varieties, and are capable of supporting commercially viable agricultural operations even on smaller properties. The Board of Supervisors has determined that such “superprime” agricultural lands are important to protect and therefore finds that parcels between five acres and less than 20 acres in size are eligible for inclusion in 40-acre minimum prime preserves, pursuant to Subsection 1-2.2.C.2.b above.

#### **4. Prime Preserves Reduced in Size with Special Findings**

Notwithstanding the above, the Board of Supervisors may at its discretion reduce the requirements for minimum size for the creation of a prime preserve to not less than 30 acres in one parcel, or in several contiguous parcels as stipulated in Subsection 1-2.2.C.2, if it finds that such a smaller preserve is necessary due to the unique characteristics of agricultural enterprises

in this County, that the establishment of such a preserve of lesser size is consistent with the Comprehensive Plan, as provided for in Section 1-2.1, and that all of the following findings apply to the proposed preserve of lesser size:

- a. No other contiguous owners desire to enroll their land in a Williamson Act contract simultaneously to create a multiple contract preserve of 40 acres or more, pursuant to Subsection 1-2.2.C.2 above;
- b. Each parcel meets the minimum requirements established for prime or superprime land pursuant to Subsection 1-2.2.C.2;
- c. Each landowner maintains annual production records demonstrating that the land is being used for commercial agricultural production and continues to meet the eligibility requirements set forth in Section 1-2.3, and makes such records available to the County upon request;
- d. The contracts will be subject to annual monitoring by the County for a period of no less than five years and thereafter as required pursuant to Section 6-1.7 of these Rules. If at any time it is demonstrated that there is no longer a commercial agricultural operation on the premises, then the County shall proceed with issuing a notice of nonrenewal pursuant to Section 6-1.7 of these Rules.

## **5. Special consideration**

Other than superprime land, non-preserve islands surrounded by preserve lands may be considered as eligible when all criteria other than size are met.

## **D. Additions to Contracts**

Additions to existing contracts of contiguous parcels shall be allowed as follows:

### **1. Nonprime Land**

Any individual parcel 100 acres or greater in size, and which meets the definition of nonprime as set forth in these Rules, may be added to an existing nonprime contract provided the existing parcel(s) and parcel to be added are contiguous and are under the same ownership.

No sub-100 acre additions to nonprime contracts shall be allowed, except when the parcels to be added and existing contract are under the same ownership.

### **2. Prime and Superprime Land**

Any individual parcel that meets the definition of either prime land or superprime land as set forth in Subsection 1-2.2.C.2, and is a minimum of 20 acres or five acres, respectively, may be added to an existing prime or superprime contract within a prime preserve that is contiguous and under the same ownership. Any individual parcel that meets the definition of either prime land or superprime land as set forth in Subsection 1-2.2.C.2, and is a minimum of 20 acres or five acres, respectively, may be added to a preserve containing both nonprime and prime land only when the total resulting prime or superprime land in the two or more adjacent parcels is 40 acres or more and when these prime or superprime lands are contiguous and under the same

ownership.

No sub-20 acre additions to prime contracts or sub-five acre additions to superprime contracts shall be allowed, except when the parcels to be added and existing contract are under the same ownership and any lot line is eradicated between a parcel within the existing contract and the added land, or adjusted pursuant to Section 1-3 below, provided that all resulting parcels meet the individual parcel size requirements and combine to meet the minimum prime preserve size requirements for Williamson Act contracts as set forth in Subsection 1-2.2.C.2.

### **1-2.3. Commercial Production and Reporting Requirements**

To qualify for a Williamson Act contract and maintain ongoing eligibility, it must be demonstrated that the land is and will be used principally for the production of commercial agricultural products. This is particularly important for prime and superprime land which tends to be enrolled in smaller parcels. Therefore, contracts for prime and superprime land shall comply with the following productive acreage and annual production value/prime soils requirements, as presented in Subsections A and B below. Nonprime land is addressed in Subsection C, while Subsection D applies to all contracted land.

#### **A. Prime Land**

In order to qualify and maintain eligibility for a contract, prime land shall comply with the following:

##### **1. Minimum Productive Acreage:**

Prime land must maintain a minimum of either 50 percent of the premises or 50 acres, whichever is less, fully planted (as defined herein) in commercial agricultural production (with allowances for fallow periods, change of crop or production method), unless it can be demonstrated to the APAC that this is unreasonable due to terrain, sensitive resources or other similar constraints. Where constraints are determined to exist, the APAC will recommend the minimum productive acreage particular to the premises.

In addition to meeting this minimum productive acreage requirement, prime contracts shall also comply with either 2 or 3 below.

##### **2. Average Annual Production Value:**

- a. Agricultural production on prime land must yield an annual gross product value equal to or exceeding five hundred dollars (\$500) per gross acre<sup>2</sup> per year averaged over at least three of the previous five years; or
- b. The land is planted with fruit or nut-bearing trees, vines, bushes, or crops which have a non-bearing period of less than five years and which will normally return during the commercial bearing period on an annual basis from the production of unprocessed

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<sup>2</sup> Gross acre refers to the entire number of acres under a single contract, not just the acres in production. For example, if only 20 acres on a 40-acre contract were in cultivation, the annual gross product value would need to be at least \$1,000 per planted acre in order to meet the \$500 per gross acre requirement.

agricultural plant production not less than \$500<sup>3</sup> per gross acre; or

- c. For irrigated pasture, agricultural production must yield an annual gross product value equal to or exceeding two hundred dollars (\$200) per gross acre per year averaged over at least three of the previous five years, or must be able to support at least one animal unit month (AUM) per acre.

**3. Prime Soils:**

The land is composed of prime soils (i.e. qualifies for rating as class I or class II in the Natural Resource Conservation Service land use capability classification or 80 through 100 in the Storie Index Rating).

**B. Superprime Land**

In order to qualify and maintain eligibility for a contract, superprime land shall comply with the requirements of either Column 1 or 2 of Table 1-2 below (as described in more detail in Subsections B.1 and B.2 below), though in no case shall superprime land yield an annual gross product value per parcel less than \$5,000 and have fewer than 4.75 acres fully planted in commercial production:

**Table 1-2. Production Requirements for Superprime Land**

<b>Parcel Size (acres)</b>	<b>Column 1 Average Annual Production Value</b>	<b>Column 2 Minimum Productive Acreage per Parcel (acres)</b>
5 to 10	\$5000 per parcel	4.75
> 10 to 11	\$10,000 per parcel	5.00
> 11 to 12		5.50
> 12 to 13		6.00
> 13 to 14		6.50
> 14 to 15		7.00
> 15 to 16	\$15,000 per parcel	7.50
> 16 to 17		8.00
> 17 to 18		8.50
> 18 to 19		9.00
> 19 to < 20		9.50

**1. Average Annual Production Value:**

Agricultural production on superprime land must yield an annual gross product value per parcel equal to or in excess of the values listed in Column 1 of Table 1-2. The average annual production value is averaged over at least three (3) of the previous five years, or the land is planted with fruit or nut-bearing trees, vines, bushes, or crops which have a non-bearing period of less than five years and which will normally return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than the minimums set forth in Table 1-2. The production value is determined by multiplying the total production per parcel by the average value of the commodity for the

<sup>3</sup> The product value is determined by multiplying the total annual productive acreage on the premises by the average value of the commodity for the previous five years as determined by the Agricultural Commissioner’s Office, then dividing this total by the number of acres on the premises.

previous five years as determined by the Agricultural Commissioner's Office; or

**2. Minimum Productive Acreage:**

Contracts on superprime land must maintain a minimum acreage fully planted (as defined herein) in commercial agricultural production consistent with Column 2 of Table 1-2 (with allowances for fallow periods, change of crop or production method), unless it can be demonstrated to the APAC that this is unreasonable due to terrain, sensitive resources or other similar constraints. Where constraints are determined to exist, the APAC will determine the minimum productive acreage particular to that contract, however, in no case shall this be less than 4.75 acres.

**C. Nonprime Land**

Contracted land that is nonprime shall be engaged in active commercial agricultural production as its principal use. Nonprime land may be used for either grazing and/or cultivated agriculture and shall have a secure water source if required to support the agricultural activity.

**D. Production Records**

In order to ensure compliance with the production requirements in Section 1-2.3, agricultural operations on contracted land shall maintain records of annual productive acreage and its production value to demonstrate continued eligibility, and make this information available to the County upon request.

**1-2.4. Adjustments to Parcels and Zoning**

- A. Except as provided for in Section 1-2.2.D above, whenever a landowner wishes to enter only part of an existing parcel, the landowner shall record a subdivision map or lot line adjustment prior to or simultaneously with submitting an application for enrollment into the Agricultural Preserve Program and prior to execution of a Williamson Act contract.
- B. For prime and superprime contracts, parcels in the same ownership which are too small individually to qualify must be merged or adjusted before the contract may be recommended for approval by the APAC.
- C. After a contract is entered into, any size reduction of any parcel resulting from a land division or lot line adjustment within the contract shall be allowed only if all parcels thus created meet the eligibility criteria of this Rule and, if the exterior boundaries of the contract change, are accompanied by an application for a replacement contract.
- D. In order for a parcel or group of parcels to be eligible for new and replacement contracts, the parcel(s) shall be zoned to the applicable zoning designation consistent with the qualifying preserve.

**1-3. LOT LINE ADJUSTMENTS**

A lot line adjustment proposed on parcels which are under Williamson Act contract shall only be approved provided the landowner(s) and County mutually agree to rescind the contract or contracts and simultaneously enter into a new contract or contracts pursuant to the requirements set forth in this Rule, and the Board of Supervisors finds all of the following:

- A. The lot line adjustment shall comply with all the findings for lot line adjustments in Chapter 35, Zoning, of the Santa Barbara County Code.
- B. The new contract or contracts would enforceably restrict the adjusted boundaries of the parcel for an initial term of at least as long as the unexpired term of the rescinded contract or contracts, but for not less than 10 years.
- C. There is no net decrease in the amount of the acreage restricted. In cases where two parcels involved in a lot line adjustment are both subject to contracts rescinded pursuant to this section, this finding will be satisfied if the aggregate acreage of the land restricted by the new contracts is at least as great as the aggregate acreage restricted by the rescinded contracts.

*[Aggregate acreage refers to the total contract acreage combined between the parcels involved in the lot line adjustment.]*

- D. At least 90 percent of the land under the former contract or contracts remains under the new contract or contracts.

*[This finding refers to the location of the Williamson Act contract. Through the lot line adjustment, 90 percent of the new contract(s) would need to remain in the location of the original contract(s).]*

- E. After the lot line adjustment, the parcels of land subject to contract will be large enough to sustain their agricultural use.
- F. The lot line adjustment would not compromise the long-term agricultural productivity of the parcel or other agricultural lands subject to a contract or contracts.
- G. The lot line adjustment is not likely to result in the removal of adjacent land from agricultural use.
- H. The lot line adjustment does not result in a greater number of developable parcels than existed prior to the adjustment, or an adjusted lot that is inconsistent with the Comprehensive Plan.

#### **1-4. PERMITTED RESIDENTIAL LAND USES**

The Board of Supervisors recognizes the importance of providing housing opportunities on agricultural land enrolled in the Agricultural Preserve Program, in order to accommodate landowners and their agricultural employees. However, the Board also recognizes that the primary purpose of the Williamson Act is the long-term preservation of the maximum amount of agricultural and open space land. In an effort to balance these issues, the Uniform Rules allow for limited residential opportunities on contracted land. These allowances may be more restrictive than the applied zoning designation permits for residential site use.

All requests for residential structures including additions to existing residences, accessory dwelling units (ADUs), agricultural employee housing, and accessory improvements and structures shall be reviewed by the APAC for a compatibility determination that the improvement or structure is sited in accordance with this section and the compatibility guidelines set forth in Rule 2.

The following sections present the types of housing units potentially available on contracted land, including principal dwellings, ADUs, and agricultural employee housing. Table 1-3 highlights the various housing types and combinations permitted within each zone district. Please refer to the applicable zoning ordinances for more detailed information on the housing requirements and limitations for each zone district.

**Table 1-3. Housing Opportunities on Lands under Williamson Act Contract**

Zone District	Principal Dwelling	Agricultural Employee Housing <sup>1</sup>		RAU <sup>2,3</sup>		Guest House <sup>2</sup>		ADU <sup>2,4</sup>		JADU <sup>2,4</sup>
AG-I-5	✓	✓		N/A	+	✓	or	✓	or	✓
AG-I-10	✓	✓			+	✓	or	✓	or	✓
AG-I-20	✓	✓			+	✓	or	✓	or	✓
AG-I-40	✓	✓	+	✓	+	✓	or	✓	or	✓
AG-II-40	✓	✓	+	✓	+	✓	or	✓	or	✓
AG-II-100	✓	✓	+	✓	+	✓	or	✓	or	✓
AG-II-320	✓	✓	+	one or duplex	+	✓	or	✓	or	✓
MT-TORO	✓	N/A		N/A	+	✓	or	✓	or	✓
MT-GOL	✓	✓			+	✓	or	✓	or	✓
RES	✓	N/A			+	✓	or	✓	or	✓

<sup>1</sup> One or more based on demonstrated need.

<sup>2</sup> Limits on maximum size of unit (among other requirements).

<sup>3</sup> *The County no longer issues permits for new RAUs, and legally established (e.g., permitted), existing RAUs are considered non-conforming uses that are compatible uses on contracted lands. See Section 1-4.2 Residential Agricultural Unit.*

<sup>4</sup> A guest house shall not be permitted on a parcel containing an existing or proposed ADU or JADU (Santa Barbara County Code Chapter 35, Zoning).

**1-4.1. Principal Dwelling**

A. A single principal dwelling shall be allowed on the premises.

**B. Premises made up of parcels less than 100 acres in size.**

1. For premises with parcels between 20 acres and less than 100 acres, the principal dwelling and all accessory structures (including ADUs and JADUs), landscaping, and non-agricultural roads serving the dwelling shall occupy no more than two acres or three percent of the parcel, whichever is smaller.
2. In the case of superprime contracts (premises with parcels between five acres and less than 20 acres in size), the principal dwelling and all accessory structures, landscaping, and non-agricultural roads serving the dwelling shall occupy no more than 10,000 square feet or such larger area as is provided for under Subsection D below.
3. Farm buildings, corrals, and permitted agricultural employee housing shall not be subject to the above site limitation, except in the case of superprime contracts as described in Subsection D below.

**C. Premises containing parcels greater than or equal to 100 acres in size.**

1. For premises with multiple parcels with a zoning minimum parcel size of 100 acres or greater, a maximum of three principal dwellings may be allowed provided each dwelling is located on a separate legal parcel at least 100 acres in size. As a condition of a land use permit, the additional principal dwelling(s) shall be occupied by an immediate family member as defined herein, and the property owner shall provide evidence of a written agreement that all lands within the agricultural preserve contract shall be managed principally for agricultural purposes, subject to the terms and conditions of the Williamson Act and Uniform Rules, for

the duration of the contract.

2. Where premises contain parcels both less than 100 acres and equal to or greater than 100 acres in size, and an existing principal dwelling is located on a parcel less than 100 acres in size, no further principal dwellings are allowed.
3. In the case of a single principal dwelling on the premises, the dwelling and all accessory structures (including ADUs and JADUs), landscaping, and non-agricultural roads serving the dwelling shall occupy no more than two acres or three percent of the parcel, whichever is smaller.
4. In the case of two or three principal dwellings on the premises, the total area occupied by all of the dwellings and all accessory structures (including ADUs and JADUs), landscaping, and non-agricultural roads serving the dwellings shall be no more than three acres. Farm buildings, corrals, and permitted agricultural employee housing shall not be subject to the above site limitation.

D. Notwithstanding the commercial production requirements set forth in Section 1-2.3.B, Superprime Land, superprime parcels greater than 10 acres (but less than 20 acres) may increase their development envelope allocation by planting additional land to commercial production. For each acre (or portion thereof) in size beyond a 10-acre parcel an additional 1,000 square feet may be added to the development envelope if one additional acre beyond the required minimum productive acreage is fully planted (as herein defined) in commercial agricultural production. Table 1-4 describes the increased allowances and planting requirements that are available for each parcel size. For example, a 15-acre parcel could increase its development envelope to a maximum of 15,000 square feet if at least 12 acres (five acres above the minimum) are fully planted in commercial agricultural production. If a 15-acre parcel only wishes to add 2,000 square feet to its development envelope, then it would only need to plant two additional acres beyond its minimum productive acreage requirement of seven acres. However, the maximum amount of square feet that a 15-acre parcel could add to its development envelope is 5,000, even if six or more acres above the minimum were planted.

This development envelope shall include the principal dwelling, landscaping, driveways, and accessory structures. Roads used for agricultural purposes are not included within the development envelope. Horse and other animal facilities (e.g. stables and corrals), new agricultural employee housing, and other similar agriculturally-related structures on superprime land may be remotely sited from the principal dwelling, as long as the total area occupied by these structures, when added to the area occupied by the principal dwelling and residential accessory structures, does not exceed the permitted envelope allowance as set forth in this section.

**Table 1-4. Development Envelope Allowances on Superprime Land**

Parcel Size (acres)	Maximum Development Envelope Allowance (square feet)	Planting Requirement to Receive Allowance (acres)	Minimum Productive Acreage (from Table 1-2)
for: 5 – 10	up to: 10,000	If: 4.75	4.75

> 10 – 11	11,000	6.00	5.00
> 11 – 12	12,000	7.50	5.50
> 12 – 13	13,000	9.00	6.00
> 13 – 14	14,000	10.5	6.50
> 14 – 15	15,000	12.0	7.00
> 15 – 16	16,000	13.5	7.50
> 16 – 17	17,000	15.0	8.00
> 17 – 18	18,000	16.5	8.50
> 18 – 19	19,000	18.0	9.00
> 19 – < 20	20,000	19.5	9.50

- E. In order to preserve productive agricultural land to the maximum extent feasible, the development envelope shall minimize intrusion into agricultural areas and minimize ‘barbell’, ‘peninsula’, and ‘finger’ type configurations. A guest house or ADU, where allowed under the zoning ordinance, shall be included in the development envelope and must be clustered with the principal dwelling.

**1-4.2. Residential Agricultural Unit**

Section 35.42.210 (Residential Agricultural Units) of the County Land Use and Development Code allowing for Residential Agricultural Units (RAUs) expired on July 6, 2008 and is no longer in effect. Therefore, the County no longer issues permits for, or otherwise authorizes, new RAUs. Existing RAUs that were legally established are considered non-conforming uses and are compatible uses on lands subject to an agricultural preserve contract. Existing RAUs are subject to the regulations for non-conforming structures set forth in Chapter 35.101 of the County Land Use and Development Code. An application to expand, rebuild, or otherwise change an existing RAU must comply with (1) the regulations for non-conforming structures set forth in Chapter 35.101 of the County Land Use and Development Code, and (2) the terms of the Williamson Act contract that applies to the premises on which the existing RAU is located.

Nothing in this section affects an owner's ability to build agricultural employee housing pursuant to Section 1-4.3 below.

**1-4.3 Agricultural Employee Housing**

All requests for agricultural employee housing units subject to a Williamson Act contract, including trailers, mobile homes on permanent foundations, and other types of permanent residential structures that are proposed on the premises shall be reviewed by the Agricultural Preserve Advisory Committee for a determination of need. Along with the agricultural employee, his or her family may occupy the agricultural employee housing.

- A. Prior to the issuance of a land use permit or conditional use permit<sup>4</sup>, the landowner shall sign and record a *Notice to Property Owner* with the County that runs with the land affirming that the agricultural employee housing is occupied by an agricultural employee as defined herein. The *Notice to Property Owner* shall include a statement that if at any time the unit is occupied by someone other than an agricultural employee and his/her family, the owner must vacate or remove the unit, or convert the agricultural employee housing unit to a permitted use.
- B. Any new agricultural employee housing should be located to minimize the use of agricultural land,

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<sup>4</sup> The Zoning Ordinance currently requires that any agricultural employee for which housing is being provided work only on the premises, unless part of a farm labor camp (5 or more units). Any agricultural employee housing units subject to a Williamson Act contract shall be consistent with the Zoning Ordinance, as amended.

and avoid prime soils and conflicts with agricultural production to the maximum extent feasible.

- C. Given the unique characteristics of superprime land, landowners of superprime contracts shall demonstrate to the APAC that any new agricultural employee housing will not interfere with the agricultural operation on the subject premises or on other adjacent agricultural lands. To ensure this, any new agricultural employee housing subject to a superprime contract shall count towards the allotted development envelope as set forth in Section 1-4.1 of this Rule, though it may be remotely sited from the principal dwelling.

#### **1-4.4 Accessory Dwelling Unit and Junior Accessory Dwelling Unit**

ADUs and JADUs are subject to the following provisions:

- A. In addition to the principal dwelling, one attached or detached ADU or one JADU may be permitted, and shall be located on the same parcel as the existing principal dwelling, in accordance with the Santa Barbara County Code Chapter 35, Zoning.
- B. The ADU or JADU must be located within the applicable non-agricultural development envelope specified in Section 1-4.1, above. Detached ADUs shall be clustered with the principal dwelling.
- C. One ADU, one JADU, or one guest house shall be allowed on a parcel in accordance with the Santa Barbara County Code Chapter 35, Zoning.
- D. There are no restrictions on who may occupy the ADU.
- E. The JADU shall be subject to an owner-occupancy restriction in accordance with the Santa Barbara County Code Chapter 35, Zoning.

## UNIFORM RULE 2

### Compatible Uses within Agricultural Preserves

Land enrolled in the Agricultural Preserve Program is to be used principally for commercial agricultural production, with the exception of land enrolled for open space or recreational purposes. However, the Board recognizes that it may be appropriate to allow secondary uses on contracted land that are either incidental to, or supportive of, the agricultural operation on the property. This Rule provides guidance and criteria for evaluating these uses on land under Williamson Act and Farmland Security Zone contracts in terms of their compatibility and consistency with the purpose and intent of the Williamson Act. It is the goal of this County that, through application of the principles of compatibility in the Act, compatible uses allowed on contracted land will be beneficial to and inherently related to the agricultural use of the land.

It should be noted that some uses that are allowed by zoning are not allowed on contracted land because they would not be considered compatible with the Williamson Act. At the same time, there are uses that would be deemed compatible under the Williamson Act but would not be allowed under County zoning ordinances. Therefore, for a use to be allowed on contracted land, it must be both permitted by County zoning and found to be compatible under the Act and these Rules. Compatibility is evaluated by the APAC on a case-by-case basis. Uses deemed compatible through application of this Rule are still subject to all applicable standards and requirements in County zoning ordinances as well as the County's Comprehensive Plan, where appropriate.

The first section of this Rule provides general compatibility principles, as established under the Williamson Act, to be applied to all land uses and activities occurring within contracted land, including both Williamson Act and Farmland Security Zone contracts. The remaining sections provide more specific criteria and requirements for specific land uses and activities that the Board has determined must be met for the use or activity to be considered compatible with agriculture and consistent with the Williamson Act.

Except as specifically stated in Rule 2-2.1.A, the provisions of this rule are in addition to and do not limit applicability of the eligibility requirements of Rule 1.

#### 2-1. COMPATIBILITY GUIDELINES

##### 2-1.1. Principles of Compatibility (Section 51238.1 of the Williamson Act<sup>5</sup>)

- A. Uses approved on contracted lands shall be consistent with all of the following principles of compatibility:
1. The use will not significantly compromise the long-term productive agricultural capability of the subject contracted parcel or parcels or on other contracted lands in agricultural preserves.
  2. The use will not significantly displace or impair current or reasonably foreseeable agricultural operations on the subject contracted parcel or parcels or on other contracted lands in agricultural preserves. Uses that significantly displace agricultural operations on the subject

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<sup>5</sup> Section 2-1.1 is verbatim of state law (2006) with the exception of changes to applicable section references and replacement of the phrase "board or council" with "Board of Supervisors" or "Board".

contracted parcel or parcels may be deemed compatible if they relate directly to the production of commercial agricultural products on the subject contracted parcel or parcels or neighboring lands, including activities such as harvesting, processing, or shipping.

3. The use will not result in the significant removal of adjacent contracted land from agricultural or open-space use. In evaluating compatibility the Board of Supervisors shall consider the impacts on non-contracted lands in the agricultural preserve or preserves.
- B. The Board may include in these compatible use rules conditional uses which, without conditions or mitigations, would not be in compliance with this section. These conditional uses shall conform to the principles of compatibility set forth in Subsection 2-1.1.A above or, for nonprime lands only, satisfy the requirements of Subsection 2-1.1.C below.
- C. In applying the criteria pursuant to Section 2-1.1, the Board may approve a use on nonprime land which, because of onsite or offsite impacts, would not be in compliance with paragraphs A and B of Section 2-1.1, provided the use is approved pursuant to a conditional use permit that shall set forth findings, based on substantial evidence in the record, demonstrating the following:
1. Conditions have been required for, or incorporated into, the use that mitigate or avoid those onsite and offsite impacts so as to make the use consistent with the principles set forth in paragraphs A and B of Section 2-1.1 to the greatest extent possible while maintaining the purpose of the use.
  2. The productive capability of the subject land has been considered as well as the extent to which the use may displace or impair agricultural operations.
  3. The use is consistent with the purposes of the Agricultural Preserve Program to preserve agricultural and open-space land or supports the continuation of agricultural uses, as defined in these Rules, or the use or conservation of natural resources, on the subject parcel or on other parcels in the agricultural preserve. The use of mineral resources shall comply with Section 51238.2 of the Williamson Act.
  4. The use does not include a residential subdivision.

### **2-1.2. Other Compatibility Criteria**

- A. The use does not result in the significant increase in the density of the temporary or permanent human population that could hinder or impair agricultural operations on the subject property and/or other agricultural lands in the vicinity.
- B. The use does not require and will not encourage the extension of urban services such as sewer or the upgrade of public roads to urban standards that could encourage premature conversion of agricultural land to non-agricultural uses.
- C. The use does not include a residential subdivision in any agricultural preserve or farmland security zone.

## **2-2. SUPPORTIVE AGRICULTURAL USES**

*Adopted by Resolution No. 77-157 (March 28, 1977); amended by Resolution Nos. 77-320 (June 27, 1977), 84-464 (October 8, 1984), 07-193*

*(September 25, 2007), 14-182 (July 8, 2014), and 18-102 (May 1, 2018).*

The purpose of this section is to establish standards for compatible uses within contracted land which permit the preparation for shipment and sale and limited processing of agricultural products.

### **2-2.1. Preparation and Processing**

**A. Preparation Facilities.** The preparation for market of agricultural products in their raw state includes but is not limited to: sorting, grading, cleaning, packing, cooling and shipping, and is deemed compatible provided all the following are met:

1. The facility does not exceed 50 percent of the parcel or 30 acres, whichever is less, except the Board of Supervisors may allow a preparation facility to exceed 50 percent of the parcel if it finds that a substantial benefit to the agricultural community and the public can be demonstrated. However, in no case shall the facility exceed 30 acres. All such uses shall be confined to a single parcel (excepting the access road) within the premises and sited in a manner that minimizes, to the extent feasible, the land area taken out of agricultural production. Included within this site are roads serving these uses<sup>6</sup>, all parking and storage areas, landscaping, loading areas, all attached and detached supportive structures and any other related improvements. Wastewater treatment systems are included within this site limitation if they take land out of agricultural production.
2. The acreage allowances identified above are maximums and will only be permitted upon a demonstrated need.
3. All such uses are subject to all zoning requirements, including a conditional use permit, when applicable, and its conditions and standards that are found necessary to maintain compatible agricultural land uses.
4. The parcel with the preparation facility has at least 50 percent of the parcel or 50 acres in commercial agricultural production, whichever is less, unless it can be demonstrated to the Agricultural Preserve Advisory Committee that it is unreasonable due to terrain, sensitive habitat and/or resources or other similar constraints. Where constraints are determined to exist, the Agricultural Preserve Advisory Committee will recommend the minimum productive acreage particular to the premises. Notwithstanding the commercial production eligibility requirements in Rule 1-2.3, the Board of Supervisors may establish different minimum production acreage requirements particular to the parcel and/or premises if the Board finds that a substantial benefit to the agricultural community and public can be demonstrated.

**B. Processing of Wine Grapes.** Due to the unique qualities and desirability of processing premium table wines near the vineyard, wineries are deemed compatible within contracted land, provided that all of the following criteria are met:

1. A vineyard(s) has been planted on the parcel for which the winery is proposed prior to County approval of the winery;
2. At least 51 percent of the winery case production shall be from grapes grown on the premises

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<sup>6</sup> For dual-use roads, only that portion of the road which is required to serve the facility by extending it beyond the agricultural road will count towards the site acreage limitation. In addition, if widening a dual-use road to meet County standards takes land out of agricultural production, then the extra width will count towards the site acreage limitation.

and/or from other contracted land under the same ownership in Santa Barbara County. At least 20 percent of the case production shall be from grapes grown on the parcel with the winery. Additional vineyard planting may be required on the premises to ensure compliance with the commercial production requirements in Rule 1-2.3;

3. For premises 500 acres or less, that such uses do not occupy land exceeding 10 percent of the premises or five acres, whichever is less. Premises greater than 500 acres are permitted one additional acre for a winery site for each additional 100 acres above 500 under contract, not to exceed 20 acres. Included within this site are roads serving these uses<sup>7</sup>, all parking and storage areas, landscaping, loading areas, all attached and detached supportive structures and any other related improvements. Wastewater treatment systems are included within this site limitation if they take land out of agricultural production. Winery support facilities, including wastewater facilities and tasting rooms, may be remotely sited from the winery as long as the total area occupied by these uses, when added to the winery development envelope, does not exceed the permitted envelope allowance as set forth in this section. All such uses shall be confined to a single parcel (excepting the access road) within the premises and sited in a manner that minimizes, to the extent feasible, the land area taken out of agricultural production.
4. The acreage allowances identified above are maximums and will only be permitted upon a demonstrated need to support the agricultural operation.
5. All such uses are subject to all zoning requirements, including a conditional use permit, when applicable, and its conditions and standards that are found necessary to maintain compatible agricultural land uses.

**C. Small Scale Processing Beyond the Raw State.** Small scale processing of agricultural products other than wine grapes (wine grapes are addressed in Section 2.2.1.B) beyond the raw state are deemed compatible within contracted land, provided the following criteria are met:

1. The proposed facility is located on a parcel that has been planted with the crop proposed for processing prior to County approval of the facility;
2. Processing of horticultural or agricultural products from offsite sources shall be limited to no more than 49 percent of the total volume of processed products on the facility premises (with allowances for normalized yields upon maturity, fallow periods, and atypical harvest years), and where such premises comprise more than one legal parcel, at least five percent of the total volume of processed products shall be harvested from the legal parcel upon which the processing operation is located;
3. The processing facility and any ancillary facilities such as sales, marketing, and parking are limited to one acre;
4. In the case of superprime contracts, such facilities are limited to parcels 10 acres or greater in size and shall be either located within existing farm buildings or count towards the development envelope allowance in order to avoid displacement of productive agricultural land;

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<sup>7</sup> For dual-use roads, only that portion of the road which is required to serve the facility by extending it beyond the agricultural road will count towards the site acreage limitation. In addition, if widening a dual-use road to meet County standards takes land out of agricultural production, then the extra width will count towards the site acreage limitation.

5. The allowance identified in #3, above, is a maximum. Small Scale Processing operations will only be permitted at an appropriate scale upon a demonstrated need to support the agricultural operation.

**D. Processing of Cannabis.** Ancillary facilities in support of cannabis cultivation are compatible on contracted land subject to the following standards:

1. Drying, curing, testing, trimming, packaging, distribution, and manufacturing of cannabis, as the County may permit and/or license, may be considered compatible on agricultural preserve contracted land if the activity is consistent with the compatibility guidelines set forth in Section 2-1 of this Rule and does not hinder or impair the short-term or the long-term agricultural uses and activities on the premises or on other properties in the vicinity.
2. Processing, distribution, and manufacturing of cannabis from offsite sources shall be limited to no more than 90 percent of the total volume of processed cannabis on the premises.
3. The following cannabis related uses and activities are expressly deemed incompatible uses on agricultural preserve contracted land: retail sales and marketing of cannabis or cannabis products.

**E. Facilities Visible from a State-designated Scenic Highway.** Agricultural preparation and processing facilities visible from a State-designated scenic highway should be sited, screened, and designed to be compatible with the scenic and rural character of the area.

**2-2.2. Retail Sales**

The sale of agricultural products permitted by this Uniform Rule is deemed compatible within contracted land providing:

- A. All retail sales shall comply with all applicable regulations within the County's zoning ordinances.
- B. All retail sales adhere to the compatibility guidelines set forth in Section 2-1.
- C. Only one retail sales location is permitted on the premises.
- D. For wineries, a tasting room and retail sales are only allowed if associated with a winery on the parcel. If two or more wineries exist on the premises, they must share a single tasting room and retail sales area.

**2-3. ANIMAL BOARDING AND BREEDING FACILITIES**

*Resolution Nos. 67-193, 70-89, 70-90, 70-752, 75-929 (December 8, 1975), 78-466A (October 30, 1978), 84-464 (October 8, 1984); Minute Orders of October 18, 1971 and July 17, 1972, 07-193 (September 25, 2007)*

**2-3.1. Incidental Boarding and Breeding**

Incidental animal boarding and/or breeding facilities, whether for commercial or personal use, are compatible within contracted land providing all of the following are met:

- A. Only one incidental boarding and/or breeding facility located outside the designated building envelope is allowed on the premises for either commercial, personal or combined commercial/personal

boarding and/or breeding.

- B. Such use is genuinely incidental to the principal uses of the land as specified in the criteria set forth in Uniform Rules 1 (Agricultural) and 4 (Recreational);
- C. Any facilities required for personal boarding/breeding use shall be counted toward the designated development envelope, though the boarding/breeding facilities may be remotely sited from the principal dwelling;
- D. Any facilities required for incidental commercial boarding/breeding use on non-prime contracted land shall be limited to three percent of the parcel or two acres, whichever is less;
- E. Any facilities required for incidental commercial boarding/breeding use on prime contracted land shall be limited to three percent of the parcel or two acres, whichever is less, provided at least 50 percent of the parcel is devoted to the principal agricultural operation;
- F. Any facilities required for incidental commercial boarding/breeding use on superprime land shall be included within the designated development envelope, though the boarding/breeding facilities may be remotely sited from the principal dwelling;
- G. When required, a conditional use permit has been granted by the County pursuant to the zoning ordinance, for the boarding and/or breeding facilities.

### **2-3.2 Principal Boarding and Breeding**

Notwithstanding Subsection 1-1.1.A above, boarding and/or breeding facilities for animals developed as the principal use on the premises are compatible within contracted land providing all of the following are met:

- A. The premises must meet the eligibility requirements described in Uniform Rule 1 for either a prime or nonprime preserve. Boarding and/or breeding facilities for animals developed as the principal use of the premises are not compatible within superprime contracts;
- B. The premises meets the following commercial agricultural production requirements:
  - 1. Parcels 40 acres or greater qualifying as a prime preserve or parcels 100 acres or greater qualifying as a non-prime preserve shall maintain a minimum 20 acres of irrigated pasture.
  - 2. Two contiguous parcels qualifying together as a prime preserve:
    - a. If under a single contract, shall maintain a minimum 20 acres of irrigated pasture combined; or
    - b. If under separate contracts, each parcel for which animal breeding/boarding is the principal use shall maintain as irrigated pasture a minimum of 10 acres, or 50 percent of the parcel, whichever is greater;
- C. Such facilities shall not produce traffic volumes detrimental to the commercial agricultural productivity of the area;

- D. The total area of land covered by all permanent improvements, excluding the principal dwelling, shall not exceed 20 percent of the premises or 20 acres, whichever is less. For the purposes of this Rule, permanent improvements include: any object affixed to the ground, landscaping, buildings, and structures, such as stables and exercise rings;
- E. Such facilities adhere to the compatibility guidelines set forth in Section 2-1 of these Rules;
- F. When required, a conditional use permit has been granted for such facilities by the County pursuant to the Santa Barbara County Code Chapter 35, Zoning.

## **2-4. RECREATION**

Recreational uses, such as walking, hiking, picnicking, wilderness camping, scenic viewing, swimming, boating, fishing, hunting, and horseback riding, are deemed compatible uses on contracted land. Examples of non compatible uses are: motor vehicle use which is detrimental to the productivity of the land, and golf courses. Uses which are compatible shall meet all of the following requirements:

- A. The use is limited to land in its agricultural or natural state;
- B. The use is consistent with the compatibility guidelines set forth in Section 2-1 of this Rule and with any restrictions imposed by the applicable zone district in the Santa Barbara County Code Chapter 35, Zoning;
- C. Any facilities or structures necessary to support such uses, and which are not principally used as part of the agricultural operation, must be included within the acreage allowed for the development envelope on the premises and be sited in a manner that minimizes impacts to agriculture;
- D. Only incidental low-intensity motorized activities shall be allowed.

Contracted land that is used solely for recreation, where no agriculture is taking place, shall adhere to the requirements set forth in Rule 4.

## **2-5. FARMSTAY**

A farmstay may be included as part of an agricultural operation on contracted land, provided all of the requirements set forth below are met.

- A. The farmstay operation is located on, and is part of, a farm or ranch operation that is principally used for the production of commercial agricultural products, and the farmstay operation:
  - 1. Does not constitute the principal land use of the premises, and
  - 2. Is beneficial and inherently related to the farm or ranch operation.
- B. The farmstay operation is located on a premises of 40 acres or greater and the entire premises is located in the AG-II zone;
- C. A farmstay is a type of working farm or ranch operation that is partially oriented towards visitors or tourism by providing lodging and overnight sleeping accommodations. Lodging and meals are

incidental and not the primary function of the farmstay operation.

1. The maximum number of registered guests that can be accommodated shall be 15 per night and they shall be accommodated in no more than six bedrooms. Only registered guests may utilize the accommodations overnight;
2. Food service is only available to farmstay registered guests. The cost of any food provided shall be included in the total price for accommodation and not be charged separately.

D. The farmstay operation is housed in a principal dwelling; conversion of existing permitted buildings/structures; newly constructed cottages and/or park trailers on permanent foundations, or any combination thereof.

Farmstay operations on the premises shall principally be located within the clustered farmstay development envelope.

1. **Clustered Farmstay:** Farmstay operations shall be in clustered proximity to the principal dwelling and existing infrastructure, and sited within the non-agricultural development envelope, limited to three percent of the premises or two-acres, whichever is less. The development envelope shall include the principal dwelling unit, farmstay related structures, outdoor use areas, and infrastructure (i.e. parking, driveways, fencing, on-site wastewater systems). Roads used for agricultural purposes are not included in the development envelope.

2. **Remote Farmstay:** In addition to the clustered farmstay development envelope, one remote farmstay development envelope is allowed on the premises, not to exceed one contiguous acre. When required, a conditional use permit has been granted for a remote farmstay by the County pursuant to the Santa Barbara County Code Chapter 35, Zoning. The remote farmstay development envelope shall include farmstay related structures, outdoor use areas, and infrastructure (i.e. parking, driveways, fencing, on-site wastewater systems). Roads used for agricultural purposes are not included in the remote farmstay development envelope.

Remote farmstay development shall be sited and designed to:

- a. Minimize the disruption of agricultural land and agriculturally productive areas on the premises.
  - b. Take maximum advantage of existing roads and infrastructure.
3. In order to preserve productive agricultural land, the farmstay development envelope(s) shall minimize intrusion into agricultural areas and minimize ‘barbell’, ‘peninsula’, and ‘finger’ type configurations.

E. The farmstay operation is consistent with the compatibility guidelines set forth in Section 2-1 of this Rule and does not hinder or impair the short-term or the long-term agricultural uses and activities on the premises or on other properties in the vicinity.

## **2-7. WASTE DISPOSAL AND COMMERCIAL COMPOSTING FACILITIES**

*Resolution Nos. 67-193, 70-89, 70-90, 70-752, 75-929 (December 8, 1975), 78-466A (October 30, 1978), 84-464 (October 8, 1984); Minute Orders of October 18, 1971 and July 17, 1972, 07-193 (September 25, 2007)*

A. Sanitary fill waste disposal facilities and transfer stations are not compatible uses on contracted land.

- B. Commercial composting facilities (as defined herein) may be deemed compatible if all of the following findings are made:
1. The facility is consistent with the compatibility guidelines set forth in Section 2-1 of this Rule;
  2. The facility provides a direct benefit/link to the agricultural operation on the premises and other agricultural lands in the vicinity;
  3. Construction of the facility will require little to no grading or other ground disturbance;
  4. The facility is appropriately scaled and sited in such a manner that it will not interfere with the agricultural operation on the premises or other adjacent agricultural operations;
  5. A land restoration plan has been prepared for the facility that returns the facility site to agriculture upon its termination;
  6. The footprint of the commercial composting facility occupies no more than 10 percent of the premises, or 20 acres, whichever is less; composting is appropriately sited and scaled; and it is incidental to the primary agricultural use of the premises. Commercial composting facilities shall only occur on premises at least 40 acres in size within the AG-II zone district, in order to ensure compatibility with surrounding agricultural lands.

A conditional use permit may be required pursuant to the Santa Barbara County Code Chapter 35, Zoning.

- C. Land Reclamation Fill activities may be deemed compatible if all of the following findings are made:
1. The land reclamation fill meets the definition as set forth in these Rules;
  2. The fill activity is consistent with the compatibility guidelines set forth in Section 2-1 of this Rule;
  3. The fill activity provides a long-term benefit to the agricultural operation on the premises.

A grading permit may be required pursuant to the County's Grading Ordinance.

## **2-8. MINING EXTRACTION AND QUARRYING**

*Resolution Nos. 67-193, 70-89, 70-90, 70-752, 75-929 (December 8, 1975), 78-466A (October 30, 1978), 84-464 (October 8, 1984); Minute Orders of October 18, 1971 and July 17, 1972, 07-193 (September 25, 2007)*

Mining, extraction, and quarrying of natural resources are compatible on contracted land when such uses are incidental and will not be disruptive to the principal agricultural use on the premises and are subject to all of the following provisions:

- A. The material excavated shall be transported within a reasonable time to an off-site use or stockpiling facility. Only stockpiling and/or sorting of the material mined on the premises are permitted on contracted land. Importing material from off-site for processing and recycling activities associated with the mining operations are not compatible uses under these Rules.
- B. Pursuant to Section 51238.2 of the Williamson Act, mineral extraction shall only be approved if the

Board is able to document that the underlying contractual commitment to preserve prime or nonprime land will not be significantly impaired. Conditions imposed on mineral extraction as a compatible use shall include compliance with the reclamation standards adopted by the Mining and Geology Board pursuant to Section 2773 of the Public Resources Code, including the applicable performance standards for prime agricultural land and other agricultural land, and no exception to these standards may be permitted.

## **2-9. GAS, ELECTRIC, WATER, AND COMMUNICATION FACILITIES**

*Resolution Nos. 67-193, 70-89, 70-90, 70-752, 75-929 (December 8, 1975), 78-466A (October 30, 1978); Minute Orders of October 18, 1971 and July 17, 1972, 07-193 (September 25, 2007)*

- A. The erection, construction, alteration or maintenance of gas, electric, water or communication utility facilities are compatible uses. Communication facilities shall include, among others, radio, television, telecommunications, Cable TV and facilities necessary for the aid of navigation by land, air or sea.
- B. Agricultural accessory structures, including but not limited to, windmills or solar panels for pumping water, wind turbines used for frost protection, and water generation for on-site agricultural uses, are deemed compatible uses.
- C. Energy production structures, such as wind energy conversion systems and solar panels, are permitted subject to applicable zoning requirements and review by the Agricultural Preserve Advisory Committee pursuant to the compatibility guidelines as stated in Section 2-1 of this Rule.

## **2-10. OIL AND GAS DRILLING AND PRODUCTION FACILITIES**

*Resolution Nos. 67-193, 70-89, 70-90, 70-752, 75-929 (December 8, 1975), 78-466A (October 30, 1978); Minute Orders of October 18, 1971 and July 17, 1972, 07-193 (September 25, 2007)*

Incidental oil and gas drilling and production facilities as defined hereinafter and pipelines are compatible uses. For the purposes of this section, oil and gas drilling and production facilities are defined as all facilities necessary to:

- A. Drill for and produce oil, gas and other hydrocarbons from a well bore;
- B. Separate oil, water and gas from each other;
- C. Prepare such products for shipping and storage;
- D. Recycle, repressurize or inject such products or other substances for underground disposal, for underground storage and in connection with secondary recovery operations; and
- E. Provide storage facilities for such products pending disposal thereof under A through D hereof and to temporarily store other substances used in A through D hereof. It shall not include refineries nor "tank farms" nor any other use not accessory or incidental to drilling and production facilities as defined above nor any operations not reasonably required to be performed at or within the vicinity of the wellhead.

## **2-11. TEMPORARY FILMING AND SPECIAL EVENTS**

Temporary filming activities<sup>8</sup> and temporary uses (special events)<sup>9</sup>, as may be permitted by the County, may be considered compatible on contracted land if the activity is consistent with the compatibility guidelines set forth in Section 2-1 of this Rule and does not hinder or impair the short-term or the long-term agricultural activities on the premises or on other properties in the vicinity.

Note: All applications for temporary uses on contracted lands requiring an LUP or CUP shall be reviewed by the APAC for consistency with the Uniform Rules, as are all other applications. This note does not obviate the requirement for applications for other uses or requests for other entitlements on contracted lands to be reviewed by the APAC.

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<sup>8</sup> Pursuant to Chapter 14 C, Sections 5, 6 and 13 of the Santa Barbara County Code.

<sup>9</sup> Pursuant to Section 35.42.250 (Temporary Uses and Trailers) of the Santa Barbara County Code.

## UNIFORM RULE 3

### Williamson Act Contracts for Open Space

*Adopted by Resolution No. 75-826 (October 27, 1975), Amended by Resolution No. 84-64 (October 8, 1984), Resolution No. 07-193 (September 25, 2007), and Resolution No. 18-102 (May 1, 2018).*

This Rule applies to Williamson Act contracts solely for open space, where no agriculture is taking place. Land that is dedicated to a combination of agriculture and open space shall be considered an agricultural operation with compatible open space and must comply with the requirements and provisions for an Agricultural Preserve under Rules 1 and 2. Land used exclusively for open space is not eligible for a Farmland Security Zone contract.

The amount of land in the County that is potentially eligible for a Williamson Act contract for open space is small relative to land eligible for inclusion in the Agricultural Preserve Program on the basis of agriculture. The small number of anticipated applications due to the narrow definition of open space in the Williamson Act, combined with the diversity of open space uses and natural characteristics of the land, necessitates careful review of applications on a case-by-case basis. The sections that follow describe the minimum standards and requirements for lands enrolled in contracts for open space uses.

#### 3-1. ELIGIBILITY REQUIREMENTS

##### 3-1.1. Character of Land

To be eligible for a Williamson Act contract for Open Space the land must be located in a scenic highway corridor, a designated wildlife habitat area, a managed wetland or a submerged area as defined by these Rules. It shall be the policy of the County to favor lands which have high scenic value adjoining and visible from designated scenic highways, or land that provides necessary wildlife habitats as determined through consultation with the Department of Fish and Game.

##### 3-1.2. Comprehensive Plan and Zoning Requirements

Eligible land shall have a land use and zoning designation consistent with Section 1-2.1 of these Rules.

##### 3-1.3. Minimum Contract Size

With the exception of land adjoining or visible from a designated scenic highway, each contract shall consist of at least 100 acres of land in a single ownership in one parcel. Changes of ownership and terminations shall be subject to the provisions of Uniform Rule 6. In the event that an otherwise qualifying parcel has less than 100 acres but not less than 40 acres, the Board of Supervisors may consider it eligible based on the "unique" features of the open space land involved. "Unique" is defined here as a natural feature and/or biological process not found in other parts of the County, state or nation; a unique feature is, for example, a rare, endangered, endemic and/or exemplary floral or fauna species or geologic feature. The terms and uses of this "unique" open space shall be stated in the contract.

Land adjoining and visible from a State or locally-designated scenic highway in parcels of any size will be eligible for a Williamson Act contract for open space and preserve status under this Rule upon request of

the owner. Such contracts shall comply with all other applicable requirements of these Rules.

### **3-2. COMPATIBLE LAND USES**

No uses shall be permitted that produce an income from the property. Limited, non-intensive, incidental recreational uses may be permitted where they are deemed appropriate. These uses, by the owner or a lessee with a minimum five-year lease (or non-paying guests of either), may include hiking, horseback riding, scenic viewing, temporary tent camping (as in Federal Wilderness Areas) and similar activities. The limits and conditions on these incidental recreational uses shall be stated in the contract and may preclude certain specified recreational uses completely. Scientific study may also be conducted within a Williamson Act contract for Open Space, provided it does not result in the removal or disturbance of significant vegetation, geologic features or landforms. Except as provided for in Section 51238.(a) of the Williamson Act, no structures shall be built or placed upon the land, and no equipment use or mechanized or motorized vehicle use shall be permitted on the land except in the case of emergencies and necessities, such as fire fighting and prevention, flood control, and other hazard prevention and control. There shall be an imputed income of a minimum of \$2.00 per acre per year for assessment purposes.

### **3-3. INCOMPATIBLE LAND USES**

The following uses are considered to be incompatible with a Williamson Act contract for open space: (1) the cultivation of cannabis, including the planting, growing, harvesting, drying, curing, grading, or trimming of cannabis; and (2) manufacturing, retail sales, testing, distribution, and marketing of cannabis or cannabis products.

### **3-4. MAINTENANCE OF THE LAND**

The owner shall maintain the property in an attractive, scenic way to preserve its natural state. All maintenance activities, including vegetative management such as controlled burning, activities minimizing fire, flood and other hazards, changes to add floral or faunal materials, and changes to the natural character of the existing preserve, must be reviewed in advance by the Agricultural Preserve Advisory Committee. The County reserves the right to monitor and enforce the terms of the contract pursuant to Section 6-1.7 of these Rules.

## UNIFORM RULE 4

### Williamson Act Contracts for Recreation

*Adopted by Resolution No. 75-827 (October 27, 1975), Amended by Resolution No. 84-464 (October 8, 1984), Resolution No. 07-193 (September 25, 2007), and Resolution No. 18-102 (May 1, 2018).*

This Rule applies to Williamson Act contracts solely for recreation, where no agriculture is taking place. Land that is dedicated to a combination of agriculture and recreation shall be considered an agricultural operation with compatible recreation and must comply with the requirements and provisions for an Agricultural Preserve under Rules 1 and 2. Land used exclusively for recreation is not eligible for a Farmland Security Zone contract.

The amount of land in the County that is potentially eligible for a Williamson Act contract for recreational uses is small relative to land eligible for inclusion in the Agricultural Preserve Program on the basis of agriculture. The small number of anticipated applications combined with the diversity of recreational uses and natural characteristics of the land necessitate careful review of applications on a case-by-case basis. The sections that follow describe the minimum standards and requirements for lands enrolled in contracts for recreational uses.

#### 4-1. ELIGIBILITY REQUIREMENTS

##### 4-1.1. Comprehensive Plan and Zoning Requirements

Eligible land shall have a land use and zoning designation consistent with Section 1-2.1 of these Rules. Additionally, the proposed recreational use of the contracted land must be consistent with the zone district in which it is located.

##### 4-1.2. Minimum Contract Size

The minimum preserve and contract size shall be 100 acres in a single parcel, except where sub-100 acre parcels of outstanding scenic, historic or cultural value are deemed to be particularly suited for park and recreation purposes, in which case a minimum of 30 acres in a single parcel may qualify for a Williamson Act contract for Recreation. These sub-100 acre preserves may include, but not necessarily be limited to, access to lake shores, beaches, and rivers and streams; and areas which serve as links between outdoor recreation and natural open space preserves, including utility easements, banks of rivers, trails and scenic highway corridors. Changes of ownership and terminations shall be subject to the provisions of Uniform Rule 6.

#### 4-2. SUBMITTAL REQUIREMENTS

In order to be eligible for a Williamson Act contract for Recreation, the landowner must submit a business plan demonstrating the nature and extent of the recreational use to be provided. The business plan should include, at a minimum: a description of the recreational activities proposed on the premises and the facilities and accessory structures necessary for its operation; a timeline for implementation of the business plan; and an estimate of the number of visitors anticipated. The owner shall maintain records of visitor usage on an annual basis and provide them to the County upon request.

### **4-3. COMPATIBLE LAND USES**

- A. One principal dwelling, subject to the requirements of these Rules and applicable zoning ordinances, shall be permitted on the premises. The principal dwelling and all accessory structures and landscaping shall occupy no more than two acres or three percent of the parcel, whichever is smaller.
- B. Besides the principal dwelling, the land uses shall be limited to those which meet the definition of recreational use established in these Rules and are consistent with the applicable compatibility guidelines set forth in Rule 2.1. An exception to this is provided for in Section 51238(a)(1) of the Williamson Act, which allows for certain facilities in any preserve land, unless the Board of Supervisors finds otherwise. Examples of compatible low intensity recreational uses include hiking, picnicking, horseback riding, wilderness camping, scenic viewing, hunting, fishing, boating, swimming, and scientific research and study. Examples of non-compatible uses are: motor vehicle use which is detrimental to the productivity of the land, and golf courses. Any fee charged for the recreational use of the land shall be in a reasonable amount and shall not have the effect of unduly limiting its use by the public.
- C. Any recreational facilities, such as buildings, stables, and similar structures, shall be included in the development envelope and together with the residential structures occupy no more than three percent of the parcel or two acres, whichever is less.
- D. Requests for remote siting of structures shall be evaluated on a case-by-case basis by the Agricultural Preserve Advisory Committee, and the site for remote structures shall not exceed one acre.

### **4-4. INCOMPATIBLE LAND USES**

The following uses are considered to be incompatible with a Williamson Act contract for recreation: (1) the cultivation of cannabis, including the planting, growing, harvesting, drying, curing, grading, or trimming of cannabis; and (2) manufacturing, retail sales, testing, distribution, and marketing of cannabis or cannabis products.

### **4-5. MAINTENANCE OF THE LAND**

The landowner shall maintain the property, in an attractive, scenic way, to preserve its natural or rural character. The landowner shall submit to the APAC a management plan that details the ongoing and routine maintenance activities expected on the premises (e.g. trail maintenance), as well as deferred maintenance anticipated in the future. Except for those of a minor nature, any maintenance activities not included within this management plan, including activities minimizing fire, flood and other hazards, changes to add floral or faunal materials, and changes to the natural character of the existing preserve, must be reviewed in advance by the Agricultural Preserve Advisory Committee. The County reserves the right to monitor and enforce the terms of the contract pursuant to Section 6-1.7 of these Rules.

## UNIFORM RULE 5

### Farmland Security Zones

*Adopted by Resolution No. 99-318 (August 10, 1999) and amended by Resolution No. 07-193 (September 25, 2007)*

Farmland Security Zones were developed by the state legislature and added to the Williamson Act in 1998 as an added incentive to landowners to retain their land in agriculture for the long-term. Lands entered into contracts under the Farmland Security Zone Program are awarded greater property tax reductions (35 percent reduction of assessed Williamson Act or Proposition 13 value) in exchange for committing to stay in agriculture for a minimum of 20 years. Lands within a Farmland Security Zone are afforded the same rights and privileges and are administered similarly to lands under the regular Agricultural Preserve Program, though a few differences exist. This Rule sets forth the specific eligibility criteria, contract terms, and methods of contract termination that apply to contracted land in a Farmland Security Zone.

No land shall be included in a farmland security zone unless expressly requested by the landowner. A Farmland Security Zone may be composed of more than one contract. If more than one landowner requests the creation of a farmland security zone and the parcels are contiguous, the County shall place those parcels in the same Farmland Security Zone.

#### 5-1. ELIGIBILITY REQUIREMENTS

- A. Only whole legal parcels are eligible for Farmland Security Zone contracts.
- B. To be eligible, land must either be in an existing Williamson Act contract or the landowner(s) may also petition the Board of Supervisors to create a farmland security zone for the purpose of entering into a Farmland Security Zone contract. If in an existing Williamson Act contract, a landowner or group of landowners may petition the Board of Supervisors to rescind a contract or contracts entered into pursuant to the Williamson Act in order to simultaneously place the land under a contract(s) designating the property as a Farmland Security Zone.
- C. The land must either:
  - 1. Be designated on the Important Farmland Series maps, prepared pursuant to Govt. Code Section 65570 as predominantly (more than 50 percent of the proposed contract area) one of the following:
    - a. Prime farmland;
    - b. Farmland of statewide significance;
    - c. Unique farmland;
    - d. Farmland of local importance; or
  - 2. If not designated on the Important Farmland Series maps, it must qualify as predominantly prime as defined in these Rules.

- D. Any land located within a city's sphere of influence at the time of application for a Farmland Security Zone contract shall not be included within a farmland security zone, unless the creation of the farmland security zone within the sphere of influence has been expressly approved by resolution by the city with jurisdiction within the sphere.
- E. The land subject to a Farmland Security Zone contract may not be reduced to an area which is smaller than that which would qualify under Section 1-2.2.B.2 of these Rules.

## **5-2. CONTRACT TERMS**

### **5-2.1. Term**

The initial term of a Farmland Security Zone contract shall be no less than 20 years, and each contract shall provide for yearly automatic extensions unless a notice of nonrenewal is given pursuant to Section 6-1 of these Rules.

### **5-2.2. Permitted Residential Land Uses**

The residential land uses permitted within farmland security zone contracts are equivalent to those permitted in regular Williamson Act contracts, pursuant to Section 1-4 of these Rules.

### **5-2.3. Compatible Land Uses**

The compatible uses set forth in Uniform Rule 2 shall be considered compatible uses in a Farmland Security Zone and are governed by the same requirements and restrictions.

## **5-3. CONTRACT TERMINATION**

Terminating a contract in a farmland security zone by way of nonrenewal and cancellation is similar to regular Williamson Act contracts in terms of the process and requirements. Refer to Section 6-1 for a discussion of these methods of termination. Pursuant to the Williamson Act, land under a Farmland Security Zone contract is generally protected from termination of a contract by way of annexation and public acquisition. The requirements for contract termination by these means are set forth in Sections 51296.3 through 51296.6 of the Williamson Act.

In the case of returning a Farmland Security Zone contract to a regular Williamson Act contract, a nonrenewal of the Farmland Security Zone is required to initiate the process. After 10 years, the Farmland Security Zone contract will be rescinded and the premises re-entered into the regular Williamson Act contract. For the first 10 years of the new, regular Williamson Act contract, the restrictions of the Farmland Security Zone continue to apply as an enforceable restriction cannot be replaced by provisions that are more lenient until such time horizon has expired.

## **5-4. TRANSFER OF OWNERSHIP**

Transfers of ownership within Farmland Security Zone contracts follow the same process as in regular Williamson Act contracts. Refer to Rule 6-2 for a discussion of these processes.

## **5-5. LAND DIVISION AND LOT LINE ADJUSTMENTS**

A lot line adjustment or division of land subject to a Farmland Security Zone contract must first obtain

County approval.

No division will be approved unless it is consistent with Section 5-1.E of this Rule, and can be reasonably established that there will be no loss in the production of food and fiber within the Farmland Security Zone from said transfer and the size of each parcel remaining is economically viable for agricultural production.

Any lot line adjustment must be in accordance with the requirements set forth in Section 1-3 of these Rules.

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## UNIFORM RULE 6

### Administration

#### 6-1. CONTRACT TERMINATION

*Adopted December 13, 1971, Amended by Resolution No. 84-464, October 8, 1984, and Resolution No. 07-193 (September 25, 2007)*

The purpose of this section is to establish standards for the termination of Williamson Act and Farmland Security Zone contracts and the withdrawal of land from Agricultural Preserves and Farmland Security Zones, without impairing the integrity of the program. The procedures developed under this Rule are in accordance with the Williamson Act, and shall be used to process all requests for withdrawal from Agricultural Preserves and Farmland Security Zones and for termination of Williamson Act and Farmland Security Zone contracts. Methods for terminating Williamson Act contracts include nonrenewal, cancellation, annexation, public acquisition, and rescission. Except where expressly stated otherwise, the methods of termination presented below also apply to Farmland Security Zone contracts.

Under the Williamson Act, contracts are automatically renewed each year following the first year of a 10-year contract (or a 20-year contract for a Farmland Security Zone), unless the landowner or County serves a notice of nonrenewal or the contract is terminated by one of the other methods described below. Once the period of nonrenewal or termination has come to an end, the contract shall expire and the agricultural preserve or farmland security zone making up the boundaries of the contract shall be simultaneously disestablished.

##### 6-1.1. Nonrenewal (Unilateral notice by landowner or County)

Withdrawal by a notice of nonrenewal is the preferred method considered in all instances, whether for all or part of the contracted land where whole parcels are involved. This method is open to either party to the contract, does not require a finding of fact, and provides for an adjustment in land assessed values, pursuant to Section 426 of the Revenue and Taxation Code.

Upon serving a notice of nonrenewal, the existing contract shall remain in effect for the balance of the period remaining from the date of the original execution or the last renewal of the contract, whichever is more recent.

When landowners seek to nonrenew a part of their contracted land they must serve a notice of nonrenewal for the whole contract and seek a replacement contract for the land remaining; the part to continue under contract must separately be able to meet County eligibility requirements.

##### 6-1.2. Cancellation

###### A. Petition by Owner

An owner may petition the Board of Supervisors for cancellation of his or her Williamson Act or Farmland Security Zone contract because there is a need for a change in land use. Cancellation may occur only if the County consents; it is an exacting process. Cancellation is an expensive method of terminating a contract. To cover administrative costs, each petitioner shall pay a processing fee in an amount established by resolution by the Board of Supervisors. Processing fees may be high due to the need to prepare staff reports, conduct public hearings, and the potential environmental review

requirements under the California Environmental Quality Act. The State requires a cancellation fee equal to 12.5 percent (25 percent for Farmland Security Zones) of the current fair market value of the land as though it were free from contractual restriction.

The existence of an opportunity for another use of the land under contract shall not be sufficient reason for the cancellation of a contract. A potential alternative use of the land may be considered only if there is no proximate, noncontracted land suitable for the use to which it is proposed the contracted land be put. The uneconomic character of an existing agricultural use shall likewise not be sufficient reason for cancellation of the contract. The uneconomic character of the existing use may be considered only if there is no other reasonable or comparable agricultural use to which the land may be put.

When a landowner wishes to cancel a contract, the landowner shall petition the Board of Supervisors for cancellation, and the landowner has the burden of producing evidence to prove the circumstances which warrant contract cancellation. The owner shall cite (1) the reasons why cancellation is desired, (2) what changes in circumstances have occurred, (3) why immediate action is necessary, and (4) how the landowner is affected by the changes in circumstances. The requirements for cancellation differ between Williamson Act and Farmland Security Zone contracts as outlined below.

### **1. Williamson Act Contracts**

The Board of Supervisors may grant tentative approval for cancellation of a Williamson Act contract only if it can make all of the findings for either a. or b. below, as provided in Sec. 51282 of the Government Code:

- a. Cancellation is consistent with the purposes of the Williamson Act:
  - (1) Cancellation is for land on which a notice of nonrenewal has been served; and
  - (2) Cancellation is not likely to result in the removal of adjacent lands from agricultural use; and
  - (3) Cancellation is for an alternative use which is consistent with the applicable provisions of the comprehensive plan; and
  - (4) Cancellation will not result in discontinuous patterns of urban development; and
  - (5) There is no proximate noncontracted land which is both available and suitable for the proposed use or development of the contracted land would provide more contiguous patterns of urban development than development of proximate noncontracted land.

or

- b. Cancellation is in the public interest:
  - (1) Other public concerns substantially outweigh the objectives of the Williamson Act; and
  - (2) There is no proximate noncontracted land which is both available and suitable for the proposed use, or development of the contracted land would provide more

contiguous patterns of urban development of proximate noncontracted land.

## **2. Farmland Security Zone Contracts**

- a. As required by Section 51282 of the Williamson Act, to cancel a Farmland Security Zone contract, the County shall make both of the findings specified in paragraphs a and b of Section 1 above, based on substantial evidence in the record. Further, subdivisions (b) through (e) of Section 51282 of the Williamson Act shall apply to the findings made by the County.
- b. In its resolution tentatively approving cancellation of the contract, the County shall find all of the following:
  - (1) That no beneficial public purpose would be served by the continuation of the contract.
  - (2) That the uneconomic nature of the agricultural use is primarily attributable to circumstances beyond the control of the landowner and the local government.
  - (3) That the landowner has paid a cancellation fee equal to 25 percent of the cancellation valuation calculated in accordance with the provision set forth in Section 6-1.2.B.3.
- c. The Director of Conservation must approve the cancellation. The Director may approve the cancellation after reviewing the record of the tentative cancellation provided by the County, only if he or she finds both of the following:
  - (1) That there is substantial evidence in the record supporting the decision.
  - (2) That no beneficial public purpose would be served by the continuation of the contract.
- d. A finding that no authorized use may be made of a remnant contract parcel of five acres or less left by public acquisition pursuant to Section 51295 of the Government Code, may be substituted for the finding in Subsection 2.a above.

## **B. Cancellation Process**

1. Applications for cancellation for all or part of an Agricultural Preserve (where whole parcels are involved) shall be referred to the County Planning Commission for a recommendation to the Board of Supervisors. The application shall be accompanied by a proposal for a specified alternative use of the land. Once an application for cancellation is deemed complete pursuant to Section 65943 of the Government Code, the County shall immediately mail a notice to the Director of Conservation. Notification and communication with the Director of Conservation shall comply with Section 51284.1 of the Williamson Act.

The Planning Commission shall hold a noticed public hearing(s) to consider cancellation of the contract and disestablishment of the Agricultural Preserve or Farmland Security Zone, and any rezoning and amendment of the County Comprehensive Plan necessary to permit the nonagricultural uses contemplated by the applicant.

2. Applications for cancellation shall be referred to the Agricultural Preserve Advisory Committee for comment and report to the Board of Supervisors.
3. Prior to any action by the Board giving tentative approval to the cancellation of any contract, the County Assessor shall determine the current fair market value of the land as though it were free of the contractual restriction. The Assessor shall certify to the Board the cancellation valuation of the land for the purpose of determining the cancellation fee. At the same time, the Assessor shall send a notice to the assessee indicating the current fair market value of the land as though it were free of the contractual restriction. The notice shall advise the assessee of the right to appeal the fair market value of the land under Section 1605 of the Revenue and Taxation Code and that the appeal shall be filed within 60 days of the date of mailing printed on the notice or the postmark date therefore, whichever is later.
4. The Board of Supervisors shall schedule a noticed public hearing to consider the request for cancellation upon receipt of the above reports from the Planning Commission, the Agricultural Preserve Advisory Committee, and the Assessor. If recommended by the Planning Commission, the Board of Supervisors shall also hold concurrent noticed public hearings to consider any rezoning and Comprehensive Plan amendments necessary. Notification of these hearings to the Director of Conservation shall comply with Section 51284 of the Williamson Act.
5. Prior to giving tentative approval to the cancellation of any contract the Board shall determine and certify to the County Auditor the amount of the cancellation fee which the landowner must pay the County Treasurer as deferred taxes upon cancellation. That fee shall be an amount equal to 12.5 percent of the cancellation valuation of the property for a Williamson Act contract and 25 percent for a Farmland Security Zone contract.
6. Cancellation of the Williamson Act contract shall be contingent upon payment, in full, of the cancellation fee. The cancellation fee shall be paid to the Clerk of the Board of Supervisors, who shall transmit that fee to the County Auditor. The fee shall be paid prior to the final approval of cancellation. If the Board of Supervisors finds that it is in the public interest to do so, it may waive any payment or any portion of a payment by the landowner, or may extend the time for making the payment or a portion of the payment contingent upon the future use made of the land and its economic return to the landowner for a period of time not to exceed the unexpired period of the contract, had it not been canceled, if the requirements set forth in Section 51283.(c) of the Williamson Act are met.
7. The Board of Supervisors shall not grant cancellation for a portion of a contract (where whole parcels are involved) if the land proposed to remain under the contract would not be able to meet County eligibility criteria. Either sufficient qualifying land must remain under contract, or the petition must be made for cancellation of the entire contract.
8. Once the Board of Supervisors has granted tentative cancellation of a contract, the Clerk of the Board shall record a tentative certificate of cancellation pursuant to Section 51283.4 of the Williamson Act, which enumerates specified conditions and contingencies that must be satisfied prior to issuing a final certificate of cancellation. The landowner shall notify the Board of Supervisors when the conditions and contingencies have been satisfied. Within 30 days of receipt of the notice, and upon determination that the conditions and contingencies have been satisfied, the Board shall execute and record a certificate of cancellation of the contract. If the landowner has been unable to satisfy the conditions and contingencies, the landowner shall notify the Board

of the particular conditions or contingencies he or she is unable to satisfy. Within 30 days of receipt of the notice, and upon a determination that the landowner is unable to satisfy the conditions and contingencies listed, the Board shall execute and record a certificate of withdrawal of tentative approval of a cancellation of contract.

### **6-1.3. Rescission**

- A. Notwithstanding any other provision of these Uniform Rules, the County, upon petition by a landowner, may enter into an agreement with the landowner to rescind a contract in accordance with the contract cancellation provisions of Section 51282 of the Williamson Act in order to simultaneously place other land within the County under an agricultural conservation easement, consistent with the purposes and, except as provided in Subsection A.2 below, the requirements of the Agricultural Land Stewardship Program pursuant to Division 10.2 (commencing with Section 10200) of the Public Resources Code, provided that the Board of Supervisors makes all of the following findings:
1. The proposed agricultural conservation easement is consistent with the criteria set forth in Section 10251 of the Public Resources Code.
  2. The proposed agricultural conservation easement is evaluated pursuant to the selection criteria in Section 10252 of the Public Resources Code, and particularly subdivisions (a), (c), (e), (f), and (h), and the Board makes a finding that the proposed easement will make a beneficial contribution to the conservation of agricultural land in its area.
  3. The land proposed to be placed under an agricultural conservation easement is of equal size or larger than the land subject to the contract to be rescinded, and is equally or more suitable for agricultural use than the land subject to the contract to be rescinded. In determining the suitability of the land for agricultural use, the County shall consider the soil quality and water availability of the land, adjacent land uses, and any agricultural support infrastructure.
  4. The value of the proposed agricultural conservation easement, as determined pursuant to Section 10260 of the Public Resources Code, is equal to or greater than 12.5 percent of the cancellation valuation of the land subject to the contract to be rescinded, determined by the County Assessor to be the current fair market value of the land as though it were free of contractual restriction. The easement value and the cancellation valuation shall be determined within 30 days before the approval of the County of an agreement pursuant to this section.
- B. Notwithstanding any other provision of these Rules, the parties may upon their mutual agreement rescind a contract in order simultaneously to enter into an open-space easement agreement pursuant to the Open-Space Easement Act of 1974 (Chapter 6.6 (commencing with Section 51070)), provided that the easement is consistent with the Williamson Act for the duration of the original contract. The easement would enforceably restrict the same property for an initial term of not less than 10 years and would not be subject to the provisions of Article 4 (commencing with Section 51090) of Chapter 6.6. This action may be taken notwithstanding the prior serving of a notice of nonrenewal, and the land subject to the contract shall be assessed pursuant to Section 423 of the Revenue and Taxation Code.
- C. Notwithstanding any other provision of this chapter, the parties may upon their mutual agreement rescind a contract in order simultaneously to enter into a new contract pursuant to these Uniform

Rules, which new contract would enforceably restrict the same property for an initial term at least as long as the unexpired term of the contract being so rescinded but not less than 10 years. Such action may be taken notwithstanding the prior serving of a notice of nonrenewal relative to the former contract.

#### **6-1.4. Annexation by City**

On the annexation by any city in the County of any land under a Williamson Act contract the city shall succeed to all rights, duties, and powers of the County. Under certain limited circumstances defined in Section 51243.5 of the Williamson Act a city may elect not to succeed to the rights, duties, and powers of the County under the contract. For Farmland Security Zone contracts, see the provisions of Sections 51296.3 through 51296.6 of the Williamson Act.

Whenever part of the land under a Williamson Act contract is removed from such status through annexation to a city, the part remaining under contract must be able to meet County eligibility criteria. In the event that unqualified land is left subject to contract, the County shall immediately serve notice of nonrenewal for such land.

In cases of annexation of land under contract, coordination is encouraged between the annexing city, Local Agency Formation Commission (LAFCO), the County, and the landowner to ensure that proper protocol is being followed and that all parties are provided the opportunity to comment and work towards the best possible outcome for all parties involved.

#### **6-1.5. Eminent Domain or Other Acquisition**

Pursuant to Section 51295 of the Williamson Act, upon the termination of an action in eminent domain for the condemnation of the fee title, or of an acquisition in lieu of eminent domain, for a public improvement by a public agency, for land subject to a Williamson Act contract, the contract shall be null and void for all land actually taken or acquired, as of the date the action was filed. If, in either such action, only part of the land under contract is acquired, and the remaining land is not able to meet County eligibility criteria, a notice of nonrenewal shall be filed immediately by the County against such remaining land.

No public agency or person, except as provided for in Section 51293, shall propose to acquire and locate a public improvement within an agricultural preserve unless the following findings are made:

- A. The location is not based primarily on a consideration of the lower cost of acquiring land in an agricultural preserve.
- B. If the land is agricultural land covered under a contract pursuant to these Rules for any public improvement, that there is no other land within or outside the preserve on which it is reasonably feasible to locate the public improvement.

When land in an agricultural preserve is acquired by a public entity, the public entity shall notify the Director of Conservation within 10 working days. The notice shall include a general explanation of the decision and the findings made pursuant to A and B above.

For Farmland Security Zone contracts, see Sections 51296.3 through 51296.6 of the Williamson Act for the relevant rule and requirements.

### **6-1.6. Termination of Multiple Contract Preserves**

At the time of termination, cancellation, or notice of nonrenewal, parcels in a multiple contract preserve (e.g. contiguous lands qualifying under Subsection 1-2.2.A.2) may not be continued under contract if the remaining land cannot qualify by itself. At such time the County may (but shall not be required to) serve a notice of nonrenewal on the remaining land if it does not otherwise qualify for participation in the Agricultural Preserve Program. In the event the remaining land does not qualify for the Agricultural Preserve Program and a determination is made that it would be in the public interest to retain the remaining land in the Agricultural Preserve Program, then those parcels may remain under contract if the Board of Supervisors makes all of the findings set forth in Subsection 1-2.2.B.4 of these Rules.

### **6-1.7. Monitoring and Enforcement**

Williamson Act and Farmland Security Zone contracts are binding agreements between landowners and the County that assume that the terms of the contract continue to be met in exchange for the restricted property tax assessments. As such, landowners must remain in compliance during the entire life of the contract, even after nonrenewal has been initiated. If, at any time, the APAC finds that the terms of a contract, including the requirements set forth in these Rules, are no longer being met, the County shall give the landowner 60 days to remedy the contract violation. If the violation persists at the end of this period, the issue shall be brought in front of the APAC at its next scheduled meeting for a determination on how to proceed. Options for addressing unresolved violations include recommendation to the Board of Supervisors for the immediate issuance of a notice of nonrenewal or, for those contracts already in nonrenewal, court action.

The County shall monitor the Agricultural Preserve Program to ensure continued compliance by periodically reviewing the continuing eligibility of properties under contract and checking for violations. Methods for monitoring include:

- A. Review of (1) permit applications and recorded documents (e.g. residential construction or processing facility; property transfers), and/or (2) neighbor complaints. In conjunction with a permit application or neighbor complaint, the County may conduct field visits to ensure that the contracted land continues to meet eligibility requirements or determine whether any contract violations have occurred.
- B. For prime and superprime contracts for which enrollment into the Agricultural Preserve Program is dependent upon maintaining sufficient gross annual income from the agricultural operation, minimum land in production, or other contractual requirements, shall make production reports, commodity sales receipts, agricultural income forms from their income tax records, or other use or income records relating to the contracted land available to the County upon request.
- C. The Assessor may report to the APAC any premises which do not appear to meet the eligibility requirements set forth in Rule 1-2.

## **6-2. TRANSFER OF OWNERSHIP OF CONTRACTED LAND**

*Adopted by Resolution No. 73-788 (December 3, 1973), Amended by Resolution Nos. 80-407 (September 15, 1980) Resolution No. 84-464 (October 8, 1984) and Resolution No. 07-193 (September 25, 2007)*

The purpose of this section is to establish procedures for the maintenance of contracts wherein changes in legal description and/or ownership occur without impairing the integrity of the program. The procedures developed under this section are in accordance with the Williamson Act, and shall be used to process all transfers of ownership in Williamson Act and Farmland Security Zone contracts.

- A. Transaction that transfers all land restricted by a Williamson Act or Farmland Security Zone contract where no changes in boundaries occur.

The transferee shall cause to be completed and signed immediately subsequent to the instrument creating the new ownership a *Notification of Assumption of Williamson Act/Farmland Security Zone Contract* (form may be obtained by contacting Planning and Development). The assumption notice shall include the legal description set forth in the instrument which transferred the ownership interest or a reference to the recording data for the contract being assumed, and shall submit said document along with the applicable fee to Planning and Development. County Counsel shall then review and approve as to form and return the form to the applicant for subsequent recording by the County Recorder's Office.

- B. Transaction that transfers a portion of land restricted by a Williamson Act or Farmland Security Zone contract, where whole legal parcels are transferred.

1. The transferee(s) shall cause to be completed and filed with the Agricultural Preserve Advisory Committee a new contract application for each of the ownerships, together with such fee as is required. The transferor shall similarly furnish a new application for the portion retained.
2. New contracts shall be signed and recorded by transferor(s) and transferee(s) immediately subsequent to the transaction creating new ownership(s).
3. Should any transfer of ownerships create parcels which do not qualify under the eligibility criteria set forth in these Rules, the County shall serve notice of nonrenewal on the nonconforming parcels, and record its notice of nonrenewal.

- C. Transaction that transfers a portion of land restricted by a Williamson Act or Farmland Security Zone contract where subdivisions occur.

1. Only whole legal parcels are allowed within Williamson Act and Farmland Security Zone contracts. Any boundary changes that subdivide parcels, therefore, must first be processed by the County Planning and Development Department through its subdivision procedures, and must meet all requirements of such process before any action may be taken by the Agricultural Preserve Advisory Committee.
2. The transferee(s) shall cause to be completed and filed with the Planning and Development Department new Williamson Act or Farmland Security Zone contract applications, maps and legal descriptions for each of the ownerships, together with such fees as are required. The transferor shall similarly furnish applications, maps and legal descriptions together with such fees as are required for the portion retained.
3. New contracts shall be signed and recorded by transferor(s) and transferee(s) immediately subsequent to the transaction creating new ownership(s).
4. Should any transfer of ownership create parcels which do not qualify under the eligibility criteria set forth in these Rules, the County shall serve and record a notice of nonrenewal on the non-complying parcels.

- D. Transfer of all or a portion of land under a Williamson Act or Farmland Security Zone contract between immediate family members.

Nothing contained in these Uniform Rules shall prevent the transfer of ownership from one immediate family member to another (per Section 51230.1 of the Williamson Act) of a portion of land which is currently designated as an agricultural preserve under contract, if all of the following conditions are satisfied:

1. The parcel to be transferred is a whole legal parcel at least 10 acres in size in the case of prime agricultural land or at least 40 acres in size in the case of nonprime land; and
2. The legal parcel to be transferred conforms to the applicable local zoning and land division ordinances and local coastal program; and
3. The parcel to be transferred complies with all applicable requirements of these Rules and relevant County zoning ordinances relating to agricultural income and permanent agricultural improvements which are imposed by the County as a condition of a contract executed covering the land of which the legal parcel to be transferred is a portion. For purposes of this paragraph, if the contracted land already complies with these requirements, the portion of that land to be transferred shall be deemed to comply with these requirements; and
4. There exists a written agreement between the immediate family members who are parties to the proposed transfer that the land which is subject to a Williamson Act or Farmland Security Zone contract and the portion of that land which is to be transferred will be operated under the joint management of the parties subject to the terms and conditions and for the duration of the contract.

A transfer of ownership described above shall have no effect on any contract covering the land of which a portion was the subject of that transfer. The portion so transferred shall remain subject to that contract.

Upon transferring land to an immediate family member pursuant to this section, the landowner shall provide a *Notice to the County Agricultural Commissioner* of said agreement.

E. Successors in Interest.

When title to land subject to contract passes to successors, and in so doing creates circumstances whereby the land, or the remaining land subject to contract, no longer meets County eligibility criteria, a notice of nonrenewal shall be filed immediately by the County against such unqualified land.

**APPENDIX C**  
**CALEEMOD RESULTS**



Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**Santa Barbara County Agricultural Enterprise Ordinance  
Santa Barbara-North of Santa Ynez County, Annual**

**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Hotel	300.00	Room	30.00	150,000.00	255
User Defined Recreational	900.00	User Defined Unit	100.00	450,000.00	765
User Defined Recreational	10.00	User Defined Unit	300.00	0.00	450
User Defined Recreational	30.00	User Defined Unit	600.00	0.00	7000
User Defined Recreational	10.00	User Defined Unit	250.00	0.00	700
User Defined Recreational	75.00	User Defined Unit	150.00	0.00	8750

**1.2 Other Project Characteristics**

<b>Urbanization</b>	Rural	<b>Wind Speed (m/s)</b>	3.1	<b>Precipitation Freq (Days)</b>	37
<b>Climate Zone</b>	4	<b>Operational Year</b>		2025	
<b>Utility Company</b>	Pacific Gas and Electric Company				
<b>CO2 Intensity (lb/MWhr)</b>	203.98	<b>CH4 Intensity (lb/MWhr)</b>	0.033	<b>N2O Intensity (lb/MWhr)</b>	0.004

**1.3 User Entered Comments & Non-Default Data**

- Project Characteristics -
- Land Use - AEO VMT Assumptions; population based on annual average daily population
- Construction Phase - No construction
- Off-road Equipment - No construction
- Vehicle Trips - AEO VMT Assumptions
- Consumer Products - No area source emissions from operation
- Area Coating - No area source emissions from operation

Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Energy Use - No non-mobile-source operational emissions

Water And Wastewater - No operational water demand

Solid Waste - No operational solid waste

Trips and VMT - Construction not calculated

Table Name	Column Name	Default Value	New Value
tblAreaCoating	ReapplicationRatePercent	10	0
tblConstructionPhase	NumDays	12,400.00	0.00
tblConsumerProducts	ROG_EF	2.14E-05	0
tblConsumerProducts	ROG_EF_Degreaser	3.542E-07	0
tblConsumerProducts	ROG_EF_PesticidesFertilizers	5.152E-08	0
tblEnergyUse	LightingElect	2.35	0.00
tblEnergyUse	NT24E	3.22	0.00
tblEnergyUse	NT24NG	4.75	0.00
tblEnergyUse	T24E	1.83	0.00
tblEnergyUse	T24NG	39.16	0.00
tblLandUse	LandUseSquareFeet	435,600.00	150,000.00
tblLandUse	LandUseSquareFeet	0.00	450,000.00
tblLandUse	LotAcreage	10.00	30.00
tblLandUse	LotAcreage	0.00	300.00
tblLandUse	LotAcreage	0.00	250.00
tblLandUse	LotAcreage	0.00	600.00
tblLandUse	LotAcreage	0.00	150.00
tblLandUse	LotAcreage	0.00	100.00
tblLandUse	Population	0.00	255.00
tblLandUse	Population	0.00	450.00
tblLandUse	Population	0.00	700.00
tblLandUse	Population	0.00	7,000.00
tblLandUse	Population	0.00	8,750.00

Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

tblLandUse	Population	0.00	765.00
tblProjectCharacteristics	UrbanizationLevel	Urban	Rural
tblSolidWaste	SolidWasteGenerationRate	71.17	0.00
tblTripsAndVMT	VendorTripNumber	84.00	0.00
tblVehicleTrips	CC_TL	5.50	37.10
tblVehicleTrips	CC_TL	5.50	42.00
tblVehicleTrips	CC_TTP	61.60	100.00
tblVehicleTrips	CC_TTP	0.00	100.00
tblVehicleTrips	CNW_TL	6.40	0.00
tblVehicleTrips	CNW_TL	6.40	0.00
tblVehicleTrips	CNW_TTP	19.00	0.00
tblVehicleTrips	CW_TL	6.60	0.00
tblVehicleTrips	CW_TL	6.60	0.00
tblVehicleTrips	CW_TTP	19.40	0.00
tblVehicleTrips	DV_TP	38.00	0.00
tblVehicleTrips	PB_TP	4.00	0.00
tblVehicleTrips	PR_TP	58.00	100.00
tblVehicleTrips	PR_TP	0.00	100.00
tblVehicleTrips	ST_TR	8.19	3.35
tblVehicleTrips	ST_TR	0.00	2.27
tblVehicleTrips	SU_TR	5.95	3.35
tblVehicleTrips	SU_TR	0.00	2.27
tblVehicleTrips	WD_TR	8.36	3.35
tblVehicleTrips	WD_TR	0.00	2.27
tblWater	IndoorWaterUseRate	3,297,680.10	0.00
tblWater	OutdoorWaterUseRate	366,408.90	0.00

**2.0 Emissions Summary**

Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
		Highest		

**2.2 Overall Operational**

**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	1.1200e-003	1.1000e-004	0.0121	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0237	0.0237	6.0000e-005	0.0000	0.0252
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	5.1200	10.4577	69.1789	0.1651	18.5270	0.1229	18.6498	4.9617	0.1151	5.0768	0.0000	15,259.3491	15,259.3491	0.7365	0.6671	15,476.5571
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>5.1211</b>	<b>10.4578</b>	<b>69.1910</b>	<b>0.1651</b>	<b>18.5270</b>	<b>0.1229</b>	<b>18.6499</b>	<b>4.9617</b>	<b>0.1152</b>	<b>5.0769</b>	<b>0.0000</b>	<b>15,259.3728</b>	<b>15,259.3728</b>	<b>0.7365</b>	<b>0.6671</b>	<b>15,476.5823</b>

Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**2.2 Overall Operational**

**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	1.1200e-003	1.1000e-004	0.0121	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0237	0.0237	6.0000e-005	0.0000	0.0252
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	5.1200	10.4577	69.1789	0.1651	18.5270	0.1229	18.6498	4.9617	0.1151	5.0768	0.0000	15,259.3491	15,259.3491	0.7365	0.6671	15,476.5571
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>5.1211</b>	<b>10.4578</b>	<b>69.1910</b>	<b>0.1651</b>	<b>18.5270</b>	<b>0.1229</b>	<b>18.6499</b>	<b>4.9617</b>	<b>0.1152</b>	<b>5.0769</b>	<b>0.0000</b>	<b>15,259.3728</b>	<b>15,259.3728</b>	<b>0.7365</b>	<b>0.6671</b>	<b>15,476.5823</b>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
<b>Percent Reduction</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

**3.0 Construction Detail**

**Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Building Construction	Building Construction	1/1/2024	12/31/2023	5	0	

**Acres of Grading (Site Preparation Phase): 0**

Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**Acres of Grading (Grading Phase): 0**

**Acres of Paving: 0**

**Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)**

**OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
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**Trips and VMT**

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Building Construction	0		0.00	0.00	8.30	6.40				

**3.1 Mitigation Measures Construction**

**4.0 Operational Detail - Mobile**

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**4.1 Mitigation Measures Mobile**







Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**5.3 Energy by Land Use - Electricity**

**Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Hotel	0	0.0000	0.0000	0.0000	0.0000
User Defined Recreational	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**Mitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Hotel	0	0.0000	0.0000	0.0000	0.0000
User Defined Recreational	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**6.0 Area Detail**

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Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**6.1 Mitigation Measures Area**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.1200e-003	1.1000e-004	0.0121	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0237	0.0237	6.0000e-005	0.0000	0.0252
Unmitigated	1.1200e-003	1.1000e-004	0.0121	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0237	0.0237	6.0000e-005	0.0000	0.0252

**6.2 Area by SubCategory**

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.1200e-003	1.1000e-004	0.0121	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0237	0.0237	6.0000e-005	0.0000	0.0252
<b>Total</b>	<b>1.1200e-003</b>	<b>1.1000e-004</b>	<b>0.0121</b>	<b>0.0000</b>		<b>4.0000e-005</b>	<b>4.0000e-005</b>		<b>4.0000e-005</b>	<b>4.0000e-005</b>	<b>0.0000</b>	<b>0.0237</b>	<b>0.0237</b>	<b>6.0000e-005</b>	<b>0.0000</b>	<b>0.0252</b>

Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**6.2 Area by SubCategory**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.1200e-003	1.1000e-004	0.0121	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0237	0.0237	6.0000e-005	0.0000	0.0252
<b>Total</b>	<b>1.1200e-003</b>	<b>1.1000e-004</b>	<b>0.0121</b>	<b>0.0000</b>		<b>4.0000e-005</b>	<b>4.0000e-005</b>		<b>4.0000e-005</b>	<b>4.0000e-005</b>	<b>0.0000</b>	<b>0.0237</b>	<b>0.0237</b>	<b>6.0000e-005</b>	<b>0.0000</b>	<b>0.0252</b>

**7.0 Water Detail**

**7.1 Mitigation Measures Water**

Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

**7.2 Water by Land Use**

**Unmitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Hotel	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Recreational	0 / 0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**7.2 Water by Land Use**

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Hotel	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Recreational	0 / 0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**8.0 Waste Detail**

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**8.1 Mitigation Measures Waste**

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**8.2 Waste by Land Use**

**Unmitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Hotel	0	0.0000	0.0000	0.0000	0.0000
User Defined Recreational	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**Mitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Hotel	0	0.0000	0.0000	0.0000	0.0000
User Defined Recreational	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**9.0 Operational Offroad**

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Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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**10.0 Stationary Equipment**

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**Fire Pumps and Emergency Generators**

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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**Boilers**

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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**User Defined Equipment**

Equipment Type	Number
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**11.0 Vegetation**

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Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Summer

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**Santa Barbara County Agricultural Enterprise Ordinance**

**Santa Barbara-North of Santa Ynez County, Summer**

**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Hotel	300.00	Room	30.00	150,000.00	255
User Defined Recreational	900.00	User Defined Unit	100.00	450,000.00	765
User Defined Recreational	10.00	User Defined Unit	300.00	0.00	450
User Defined Recreational	30.00	User Defined Unit	600.00	0.00	7000
User Defined Recreational	10.00	User Defined Unit	250.00	0.00	700
User Defined Recreational	75.00	User Defined Unit	150.00	0.00	8750

**1.2 Other Project Characteristics**

<b>Urbanization</b>	Rural	<b>Wind Speed (m/s)</b>	3.1	<b>Precipitation Freq (Days)</b>	37
<b>Climate Zone</b>	4	<b>Operational Year</b>		2025	
<b>Utility Company</b>	Pacific Gas and Electric Company				
<b>CO2 Intensity (lb/MWhr)</b>	203.98	<b>CH4 Intensity (lb/MWhr)</b>	0.033	<b>N2O Intensity (lb/MWhr)</b>	0.004

**1.3 User Entered Comments & Non-Default Data**

- Project Characteristics -
- Land Use - AEO VMT Assumptions; population based on annual average daily population
- Construction Phase - No construction
- Off-road Equipment - No construction
- Vehicle Trips - AEO VMT Assumptions
- Consumer Products - No area source emissions from operation
- Area Coating - No area source emissions from operation

Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Summer

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Energy Use - No non-mobile-source operational emissions

Water And Wastewater - No operational water demand

Solid Waste - No operational solid waste

Trips and VMT - Construction not calculated

Table Name	Column Name	Default Value	New Value
tblAreaCoating	ReapplicationRatePercent	10	0
tblConstructionPhase	NumDays	12,400.00	0.00
tblConsumerProducts	ROG_EF	2.14E-05	0
tblConsumerProducts	ROG_EF_Degreaser	3.542E-07	0
tblConsumerProducts	ROG_EF_PesticidesFertilizers	5.152E-08	0
tblEnergyUse	LightingElect	2.35	0.00
tblEnergyUse	NT24E	3.22	0.00
tblEnergyUse	NT24NG	4.75	0.00
tblEnergyUse	T24E	1.83	0.00
tblEnergyUse	T24NG	39.16	0.00
tblLandUse	LandUseSquareFeet	435,600.00	150,000.00
tblLandUse	LandUseSquareFeet	0.00	450,000.00
tblLandUse	LotAcreage	10.00	30.00
tblLandUse	LotAcreage	0.00	300.00
tblLandUse	LotAcreage	0.00	250.00
tblLandUse	LotAcreage	0.00	600.00
tblLandUse	LotAcreage	0.00	150.00
tblLandUse	LotAcreage	0.00	100.00
tblLandUse	Population	0.00	255.00
tblLandUse	Population	0.00	450.00
tblLandUse	Population	0.00	700.00
tblLandUse	Population	0.00	7,000.00
tblLandUse	Population	0.00	8,750.00

Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Summer

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

tblLandUse	Population	0.00	765.00
tblProjectCharacteristics	UrbanizationLevel	Urban	Rural
tblSolidWaste	SolidWasteGenerationRate	71.17	0.00
tblTripsAndVMT	VendorTripNumber	84.00	0.00
tblVehicleTrips	CC_TL	5.50	37.10
tblVehicleTrips	CC_TL	5.50	42.00
tblVehicleTrips	CC_TTP	61.60	100.00
tblVehicleTrips	CC_TTP	0.00	100.00
tblVehicleTrips	CNW_TL	6.40	0.00
tblVehicleTrips	CNW_TL	6.40	0.00
tblVehicleTrips	CNW_TTP	19.00	0.00
tblVehicleTrips	CW_TL	6.60	0.00
tblVehicleTrips	CW_TL	6.60	0.00
tblVehicleTrips	CW_TTP	19.40	0.00
tblVehicleTrips	DV_TP	38.00	0.00
tblVehicleTrips	PB_TP	4.00	0.00
tblVehicleTrips	PR_TP	58.00	100.00
tblVehicleTrips	PR_TP	0.00	100.00
tblVehicleTrips	ST_TR	8.19	3.35
tblVehicleTrips	ST_TR	0.00	2.27
tblVehicleTrips	SU_TR	5.95	3.35
tblVehicleTrips	SU_TR	0.00	2.27
tblVehicleTrips	WD_TR	8.36	3.35
tblVehicleTrips	WD_TR	0.00	2.27
tblWater	IndoorWaterUseRate	3,297,680.10	0.00
tblWater	OutdoorWaterUseRate	366,408.90	0.00

**2.0 Emissions Summary**



Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Summer

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**2.2 Overall Operational**

**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.0124	1.2200e-003	0.1349	1.0000e-005		4.8000e-004	4.8000e-004		4.8000e-004	4.8000e-004		0.2900	0.2900	7.5000e-004		0.3088
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	27.7077	53.4682	371.8769	0.9219	104.0582	0.6760	104.7342	27.8173	0.6334	28.4506		93,918.5368	93,918.5368	4.3575	3.8698	95,180.6623
<b>Total</b>	<b>27.7201</b>	<b>53.4695</b>	<b>372.0118</b>	<b>0.9219</b>	<b>104.0582</b>	<b>0.6765</b>	<b>104.7346</b>	<b>27.8173</b>	<b>0.6338</b>	<b>28.4511</b>		<b>93,918.8268</b>	<b>93,918.8268</b>	<b>4.3583</b>	<b>3.8698</b>	<b>95,180.9711</b>

**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.0124	1.2200e-003	0.1349	1.0000e-005		4.8000e-004	4.8000e-004		4.8000e-004	4.8000e-004		0.2900	0.2900	7.5000e-004		0.3088
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	27.7077	53.4682	371.8769	0.9219	104.0582	0.6760	104.7342	27.8173	0.6334	28.4506		93,918.5368	93,918.5368	4.3575	3.8698	95,180.6623
<b>Total</b>	<b>27.7201</b>	<b>53.4695</b>	<b>372.0118</b>	<b>0.9219</b>	<b>104.0582</b>	<b>0.6765</b>	<b>104.7346</b>	<b>27.8173</b>	<b>0.6338</b>	<b>28.4511</b>		<b>93,918.8268</b>	<b>93,918.8268</b>	<b>4.3583</b>	<b>3.8698</b>	<b>95,180.9711</b>

Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Summer

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

**3.0 Construction Detail**

**Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Building Construction	Building Construction	1/1/2024	12/31/2023	5	0	

**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 0**

**Acres of Paving: 0**

**Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)**

**OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor

**Trips and VMT**

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Building Construction	0		0.00	0.00	8.30	6.40				

**3.1 Mitigation Measures Construction**

**4.0 Operational Detail - Mobile**

Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Summer

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**4.1 Mitigation Measures Mobile**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	27.7077	53.4682	371.8769	0.9219	104.0582	0.6760	104.7342	27.8173	0.6334	28.4506		93,918.5368	93,918.5368	4.3575	3.8698	95,180.6623
Unmitigated	27.7077	53.4682	371.8769	0.9219	104.0582	0.6760	104.7342	27.8173	0.6334	28.4506		93,918.5368	93,918.5368	4.3575	3.8698	95,180.6623

**4.2 Trip Summary Information**

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Hotel	1,005.00	1,005.00	1005.00	13,571,922	13,571,922
User Defined Recreational	2,043.00	2,043.00	2043.00	31,233,384	31,233,384
User Defined Recreational	22.70	22.70	22.70	347,038	347,038
User Defined Recreational	68.10	68.10	68.10	1,041,113	1,041,113
User Defined Recreational	22.70	22.70	22.70	347,038	347,038
User Defined Recreational	170.25	170.25	170.25	2,602,782	2,602,782
<b>Total</b>	<b>3,331.75</b>	<b>3,331.75</b>	<b>3,331.75</b>	<b>49,143,276</b>	<b>49,143,276</b>

**4.3 Trip Type Information**

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Hotel	0.00	37.10	0.00	0.00	100.00	0.00	100	0	0
User Defined Recreational	0.00	42.00	0.00	0.00	100.00	0.00	100	0	0
User Defined Recreational	0.00	42.00	0.00	0.00	100.00	0.00	100	0	0
User Defined Recreational	0.00	42.00	0.00	0.00	100.00	0.00	100	0	0

Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Summer

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
User Defined Recreational	0.00	42.00	0.00	0.00	100.00	0.00	100	0	0
User Defined Recreational	0.00	42.00	0.00	0.00	100.00	0.00	100	0	0

**4.4 Fleet Mix**

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Hotel	0.499590	0.054528	0.207373	0.147926	0.027658	0.006798	0.011091	0.006226	0.000954	0.000578	0.029982	0.003446	0.003849
User Defined Recreational	0.499590	0.054528	0.207373	0.147926	0.027658	0.006798	0.011091	0.006226	0.000954	0.000578	0.029982	0.003446	0.003849

**5.0 Energy Detail**

Historical Energy Use: N

**5.1 Mitigation Measures Energy**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Summer

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**5.2 Energy by Land Use - NaturalGas**

**Unmitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Hotel	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
User Defined Recreational	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**Mitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Hotel	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
User Defined Recreational	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**6.0 Area Detail**

Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Summer

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**6.1 Mitigation Measures Area**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.0124	1.2200e-003	0.1349	1.0000e-005		4.8000e-004	4.8000e-004		4.8000e-004	4.8000e-004		0.2900	0.2900	7.5000e-004		0.3088
Unmitigated	0.0124	1.2200e-003	0.1349	1.0000e-005		4.8000e-004	4.8000e-004		4.8000e-004	4.8000e-004		0.2900	0.2900	7.5000e-004		0.3088

**6.2 Area by SubCategory**

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0124	1.2200e-003	0.1349	1.0000e-005		4.8000e-004	4.8000e-004		4.8000e-004	4.8000e-004		0.2900	0.2900	7.5000e-004		0.3088
<b>Total</b>	<b>0.0124</b>	<b>1.2200e-003</b>	<b>0.1349</b>	<b>1.0000e-005</b>		<b>4.8000e-004</b>	<b>4.8000e-004</b>		<b>4.8000e-004</b>	<b>4.8000e-004</b>		<b>0.2900</b>	<b>0.2900</b>	<b>7.5000e-004</b>		<b>0.3088</b>

Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Summer

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**6.2 Area by SubCategory**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0124	1.2200e-003	0.1349	1.0000e-005		4.8000e-004	4.8000e-004		4.8000e-004	4.8000e-004		0.2900	0.2900	7.5000e-004		0.3088
<b>Total</b>	<b>0.0124</b>	<b>1.2200e-003</b>	<b>0.1349</b>	<b>1.0000e-005</b>		<b>4.8000e-004</b>	<b>4.8000e-004</b>		<b>4.8000e-004</b>	<b>4.8000e-004</b>		<b>0.2900</b>	<b>0.2900</b>	<b>7.5000e-004</b>		<b>0.3088</b>

**7.0 Water Detail**

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**7.1 Mitigation Measures Water**

Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Summer

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**8.0 Waste Detail**

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**8.1 Mitigation Measures Waste**

**9.0 Operational Offroad**

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Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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**10.0 Stationary Equipment**

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**Fire Pumps and Emergency Generators**

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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**Boilers**

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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**User Defined Equipment**

Equipment Type	Number
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**11.0 Vegetation**

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Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**Santa Barbara County Agricultural Enterprise Ordinance**

**Santa Barbara-North of Santa Ynez County, Winter**

**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Hotel	300.00	Room	30.00	150,000.00	255
User Defined Recreational	900.00	User Defined Unit	100.00	450,000.00	765
User Defined Recreational	10.00	User Defined Unit	300.00	0.00	450
User Defined Recreational	30.00	User Defined Unit	600.00	0.00	7000
User Defined Recreational	10.00	User Defined Unit	250.00	0.00	700
User Defined Recreational	75.00	User Defined Unit	150.00	0.00	8750

**1.2 Other Project Characteristics**

<b>Urbanization</b>	Rural	<b>Wind Speed (m/s)</b>	3.1	<b>Precipitation Freq (Days)</b>	37
<b>Climate Zone</b>	4			<b>Operational Year</b>	2025
<b>Utility Company</b>	Pacific Gas and Electric Company				
<b>CO2 Intensity (lb/MWhr)</b>	203.98	<b>CH4 Intensity (lb/MWhr)</b>	0.033	<b>N2O Intensity (lb/MWhr)</b>	0.004

**1.3 User Entered Comments & Non-Default Data**

- Project Characteristics -
- Land Use - AEO VMT Assumptions; population based on annual average daily population
- Construction Phase - No construction
- Off-road Equipment - No construction
- Vehicle Trips - AEO VMT Assumptions
- Consumer Products - No area source emissions from operation
- Area Coating - No area source emissions from operation

Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Energy Use - No non-mobile-source operational emissions

Water And Wastewater - No operational water demand

Solid Waste - No operational solid waste

Trips and VMT - Construction not calculated

Table Name	Column Name	Default Value	New Value
tblAreaCoating	ReapplicationRatePercent	10	0
tblConstructionPhase	NumDays	12,400.00	0.00
tblConsumerProducts	ROG_EF	2.14E-05	0
tblConsumerProducts	ROG_EF_Degreaser	3.542E-07	0
tblConsumerProducts	ROG_EF_PesticidesFertilizers	5.152E-08	0
tblEnergyUse	LightingElect	2.35	0.00
tblEnergyUse	NT24E	3.22	0.00
tblEnergyUse	NT24NG	4.75	0.00
tblEnergyUse	T24E	1.83	0.00
tblEnergyUse	T24NG	39.16	0.00
tblLandUse	LandUseSquareFeet	435,600.00	150,000.00
tblLandUse	LandUseSquareFeet	0.00	450,000.00
tblLandUse	LotAcreage	10.00	30.00
tblLandUse	LotAcreage	0.00	300.00
tblLandUse	LotAcreage	0.00	250.00
tblLandUse	LotAcreage	0.00	600.00
tblLandUse	LotAcreage	0.00	150.00
tblLandUse	LotAcreage	0.00	100.00
tblLandUse	Population	0.00	255.00
tblLandUse	Population	0.00	450.00
tblLandUse	Population	0.00	700.00
tblLandUse	Population	0.00	7,000.00
tblLandUse	Population	0.00	8,750.00

Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

tblLandUse	Population	0.00	765.00
tblProjectCharacteristics	UrbanizationLevel	Urban	Rural
tblSolidWaste	SolidWasteGenerationRate	71.17	0.00
tblTripsAndVMT	VendorTripNumber	84.00	0.00
tblVehicleTrips	CC_TL	5.50	37.10
tblVehicleTrips	CC_TL	5.50	42.00
tblVehicleTrips	CC_TTP	61.60	100.00
tblVehicleTrips	CC_TTP	0.00	100.00
tblVehicleTrips	CNW_TL	6.40	0.00
tblVehicleTrips	CNW_TL	6.40	0.00
tblVehicleTrips	CNW_TTP	19.00	0.00
tblVehicleTrips	CW_TL	6.60	0.00
tblVehicleTrips	CW_TL	6.60	0.00
tblVehicleTrips	CW_TTP	19.40	0.00
tblVehicleTrips	DV_TP	38.00	0.00
tblVehicleTrips	PB_TP	4.00	0.00
tblVehicleTrips	PR_TP	58.00	100.00
tblVehicleTrips	PR_TP	0.00	100.00
tblVehicleTrips	ST_TR	8.19	3.35
tblVehicleTrips	ST_TR	0.00	2.27
tblVehicleTrips	SU_TR	5.95	3.35
tblVehicleTrips	SU_TR	0.00	2.27
tblVehicleTrips	WD_TR	8.36	3.35
tblVehicleTrips	WD_TR	0.00	2.27
tblWater	IndoorWaterUseRate	3,297,680.10	0.00
tblWater	OutdoorWaterUseRate	366,408.90	0.00

**2.0 Emissions Summary**



Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**2.2 Overall Operational**

**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.0124	1.2200e-003	0.1349	1.0000e-005		4.8000e-004	4.8000e-004		4.8000e-004	4.8000e-004		0.2900	0.2900	7.5000e-004		0.3088
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	28.5566	57.4854	390.1683	0.9075	104.0582	0.6761	104.7342	27.8173	0.6334	28.4507		92,461.33 12	92,461.33 12	4.5371	4.0623	93,785.32 56
<b>Total</b>	<b>28.5690</b>	<b>57.4867</b>	<b>390.3033</b>	<b>0.9075</b>	<b>104.0582</b>	<b>0.6765</b>	<b>104.7347</b>	<b>27.8173</b>	<b>0.6339</b>	<b>28.4512</b>		<b>92,461.62 12</b>	<b>92,461.62 12</b>	<b>4.5379</b>	<b>4.0623</b>	<b>93,785.63 44</b>

**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.0124	1.2200e-003	0.1349	1.0000e-005		4.8000e-004	4.8000e-004		4.8000e-004	4.8000e-004		0.2900	0.2900	7.5000e-004		0.3088
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	28.5566	57.4854	390.1683	0.9075	104.0582	0.6761	104.7342	27.8173	0.6334	28.4507		92,461.33 12	92,461.33 12	4.5371	4.0623	93,785.32 56
<b>Total</b>	<b>28.5690</b>	<b>57.4867</b>	<b>390.3033</b>	<b>0.9075</b>	<b>104.0582</b>	<b>0.6765</b>	<b>104.7347</b>	<b>27.8173</b>	<b>0.6339</b>	<b>28.4512</b>		<b>92,461.62 12</b>	<b>92,461.62 12</b>	<b>4.5379</b>	<b>4.0623</b>	<b>93,785.63 44</b>

Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

**3.0 Construction Detail**

**Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Building Construction	Building Construction	1/1/2024	12/31/2023	5	0	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

**OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor

**Trips and VMT**

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Building Construction	0		0.00	0.00	8.30	6.40				

**3.1 Mitigation Measures Construction**

**4.0 Operational Detail - Mobile**

Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**4.1 Mitigation Measures Mobile**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	28.5566	57.4854	390.1683	0.9075	104.0582	0.6761	104.7342	27.8173	0.6334	28.4507		92,461.33 12	92,461.33 12	4.5371	4.0623	93,785.32 56
Unmitigated	28.5566	57.4854	390.1683	0.9075	104.0582	0.6761	104.7342	27.8173	0.6334	28.4507		92,461.33 12	92,461.33 12	4.5371	4.0623	93,785.32 56

**4.2 Trip Summary Information**

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Hotel	1,005.00	1,005.00	1005.00	13,571,922	13,571,922
User Defined Recreational	2,043.00	2,043.00	2043.00	31,233,384	31,233,384
User Defined Recreational	22.70	22.70	22.70	347,038	347,038
User Defined Recreational	68.10	68.10	68.10	1,041,113	1,041,113
User Defined Recreational	22.70	22.70	22.70	347,038	347,038
User Defined Recreational	170.25	170.25	170.25	2,602,782	2,602,782
<b>Total</b>	<b>3,331.75</b>	<b>3,331.75</b>	<b>3,331.75</b>	<b>49,143,276</b>	<b>49,143,276</b>

**4.3 Trip Type Information**

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Hotel	0.00	37.10	0.00	0.00	100.00	0.00	100	0	0
User Defined Recreational	0.00	42.00	0.00	0.00	100.00	0.00	100	0	0
User Defined Recreational	0.00	42.00	0.00	0.00	100.00	0.00	100	0	0
User Defined Recreational	0.00	42.00	0.00	0.00	100.00	0.00	100	0	0

Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
User Defined Recreational	0.00	42.00	0.00	0.00	100.00	0.00	100	0	0
User Defined Recreational	0.00	42.00	0.00	0.00	100.00	0.00	100	0	0

**4.4 Fleet Mix**

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Hotel	0.499590	0.054528	0.207373	0.147926	0.027658	0.006798	0.011091	0.006226	0.000954	0.000578	0.029982	0.003446	0.003849
User Defined Recreational	0.499590	0.054528	0.207373	0.147926	0.027658	0.006798	0.011091	0.006226	0.000954	0.000578	0.029982	0.003446	0.003849

**5.0 Energy Detail**

Historical Energy Use: N

**5.1 Mitigation Measures Energy**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day											lb/day					
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**5.2 Energy by Land Use - NaturalGas**

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Hotel	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
User Defined Recreational	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Hotel	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
User Defined Recreational	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**6.0 Area Detail**

Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**6.1 Mitigation Measures Area**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.0124	1.2200e-003	0.1349	1.0000e-005		4.8000e-004	4.8000e-004		4.8000e-004	4.8000e-004		0.2900	0.2900	7.5000e-004		0.3088
Unmitigated	0.0124	1.2200e-003	0.1349	1.0000e-005		4.8000e-004	4.8000e-004		4.8000e-004	4.8000e-004		0.2900	0.2900	7.5000e-004		0.3088

**6.2 Area by SubCategory**

**Unmitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0124	1.2200e-003	0.1349	1.0000e-005		4.8000e-004	4.8000e-004		4.8000e-004	4.8000e-004		0.2900	0.2900	7.5000e-004		0.3088
<b>Total</b>	<b>0.0124</b>	<b>1.2200e-003</b>	<b>0.1349</b>	<b>1.0000e-005</b>		<b>4.8000e-004</b>	<b>4.8000e-004</b>		<b>4.8000e-004</b>	<b>4.8000e-004</b>		<b>0.2900</b>	<b>0.2900</b>	<b>7.5000e-004</b>		<b>0.3088</b>

Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**6.2 Area by SubCategory**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0124	1.2200e-003	0.1349	1.0000e-005		4.8000e-004	4.8000e-004		4.8000e-004	4.8000e-004		0.2900	0.2900	7.5000e-004		0.3088
<b>Total</b>	<b>0.0124</b>	<b>1.2200e-003</b>	<b>0.1349</b>	<b>1.0000e-005</b>		<b>4.8000e-004</b>	<b>4.8000e-004</b>		<b>4.8000e-004</b>	<b>4.8000e-004</b>		<b>0.2900</b>	<b>0.2900</b>	<b>7.5000e-004</b>		<b>0.3088</b>

**7.0 Water Detail**

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**7.1 Mitigation Measures Water**

Santa Barbara County Agricultural Enterprise Ordinance - Santa Barbara-North of Santa Ynez County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**8.0 Waste Detail**

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**8.1 Mitigation Measures Waste**

**9.0 Operational Offroad**

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Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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**10.0 Stationary Equipment**

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**Fire Pumps and Emergency Generators**

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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**Boilers**

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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**User Defined Equipment**

Equipment Type	Number
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**11.0 Vegetation**

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**APPENDIX D**  
**SENSITIVE NATURAL COMMUNITIES AND BIOLOGICAL**  
**RESOURCES**



# Santa Maria Valley Special Status Species and Sensitive Habitat

Table 3.4-2. Federally and State-Listed Wildlife Species Occurring in the Santa Maria Valley

Common Name	Scientific Name	Federal Listing	State Listing	Global Rank	State Rank	Rare Plant Rating	CDFW Status	USGS Quad.	Habitats
<b>AMPHIBIANS</b>									
Arroyo toad	<i>Anaxyrus californicus</i>	Endangered	None	G2G3	S2S3	-	Species of Special Concern	Twitchell Dam	Desert wash, riparian scrub, riparian woodland, South Coast flowing waters, South Coast standing waters
California red-legged frog	<i>Rana draytonii</i>	Threatened	None	G2G3	S2S3	-	Species of Special Concern	Santa Maria, Twitchell Dam, Tepusquet Canyon, Orcutt, Casmalia, Sisquoc, Guadalupe	Aquatic, artificial flowing waters, artificial standing waters, freshwater marsh, marsh and swamp, riparian forest, riparian scrub, riparian woodland, Sacramento/San Joaquin flowing waters, Sacramento/San Joaquin standing waters, South Coast flowing waters, South Coast standing waters, wetland
California tiger salamander	<i>Ambystoma californiense</i>	Endangered	Threatened	G2G3T2	S2	-	Watch List	Santa Maria, Twitchell Dam, Sisquoc, Orcutt, Guadalupe	Cismontane woodland, meadow and seep, riparian woodland, valley and foothill grassland, vernal pool, wetland
Western spadefoot	<i>Spea hammondi</i>	None	None	G2G3	S3	-	Species of Special Concern	Santa Maria, Guadalupe, Casmalia, Twitchell Dam, Sisquoc, Orcutt	Mixed woodlands, grasslands, coastal sage scrub, chaparral, sandy washes, lowlands, river floodplains, alluvial fans, playas, alkali flats, foothills, mountains.
<b>BIRDS</b>									
American peregrine falcon	<i>Falco peregrinus anatum</i>	Delisted	Delisted	G4T4	S3S4	-	Fully Protected	Casmalia, Point Sal	Mountainous areas, river valleys, coastlines
Burrowing owl	<i>Athene cunicularia</i>	None	None	G4	S3	-	Species of Special Concern	Santa Maria	Grasslands, rangelands, agricultural areas, deserts

Common Name	Scientific Name	Federal Listing	State Listing	Global Rank	State Rank	Rare Plant Rating	CDFW Status	USGS Quad.	Habitats
California horned lark	<i>Eremophila alpestris actia</i>	None	None	G5T4Q	S4	-	Watch List	Sisquoc	Prairies, fields, airports, shores, tundra
California least tern	<i>Sternula antillarum browni</i>	Endangered	Endangered	G4T2T3 Q	S2	-	Fully Protected	Point Sal, Casmalia	Alkali playa, wetland
Southern California rufous-crowned sparrow	<i>Aimophila ruficeps canescens</i>	None	None	G5T3	S3	-	Watch List	Sisquoc	Coastal sagebrush, open chaparral, scrub oaks, pinyon pine
Swainson's hawk	<i>Buteo swainsoni</i>	None	Threatened	G5	S3	-	None	Guadalupe	Great Basin grassland, riparian forest, riparian woodland, valley and foothill grassland
Tricolored blackbird	<i>Agelaius tricolor</i>	None	Threatened	G1G2	S1S2	-	Species of Special Concern	Sisquoc, Twitchell Dam	Freshwater marsh, marsh and swamp, swamp, wetland
Western snowy plover	<i>Charadrius alexandrinus nivosus</i>	Threatened	None	G3T3	S2	-	Species of Special Concern	Point Sal, Casmalia	Sand shore, wetland
Yellow warbler	<i>Setophaga petechia</i>	None	None	G5	S3S4	-	Species of Special Concern	Sisquoc	Deciduous forests, riparian habitat
<b>FISH</b>									
Arroyo chub	<i>Gila orcuttii</i>	None	None	G2	S2	-	Species of Special Concern	Point Sal	Aquatic, South Coast flat flowing waters
Steelhead – southern California distinct population segment (DPS)	<i>Oncorhynchus mykiss irideus</i>	Endangered	Candidate Endangered	G5T1Q	S1	-	None	Sisquoc	Aquatic, South Coast flowing waters
Tidewater goby	<i>Eucyclogobius newberryi</i>	Endangered	None	G3	S3	-	None	Santa Maria, Lompoc, Point Sal, Casmalia	Aquatic, South Coast flowing waters

Common Name	Scientific Name	Federal Listing	State Listing	Global Rank	State Rank	Rare Plant Rating	CDFW Status	USGS Quad.	Habitats
Unarmored threespine stickleback	<i>Gasterosteus aculeatus williamsoni</i>	Endangered	Endangered	G5T1	S1	-	Fully Protected	Orcutt, Casmalia	Aquatic, South Coast flowing waters
<b>INVERTEBRATES</b>									
Lompoc grasshopper	<i>Trimerotropis oculens</i>	None	None	G1G2	S1S2	-	None	Casmalia, Orcutt	Grasslands, gravelly/rocky ground
Monarch butterfly (California overwintering population)	<i>Danaus plexippus</i> pop. 1	Candidate	None	G4T2T3	S2S3	-	None	Casmalia, Guadalupe, Point Sal, Santa Maria	Milkweed, flowering plants, Eucalyptus forest, dense tree cover (for overwintering)
Vernal pool fairy shrimp	<i>Branchinecta lynchi</i>	Threatened	None	G3	S3	None	None	Santa Maria, Twitchell Dam	Valley and foothill grassland, vernal pool, wetland
<b>MAMMALS</b>									
American badger	<i>Taxidea taxus</i>	None	None	G5	S3	-	Species of Special Concern	Orcutt, Santa Maria, Sisquoc, Guadalupe, Casmalia	Temperate/terrestrial grasslands, chaparral, mountains, marshes
Hoary bat	<i>Lasiurus cinereus</i>	None	None	G3G4	S4	-	None	Orcutt, Casmalia	Grasslands, woodlands, chaparral, coniferous forests, deserts
Pallid bat	<i>Antrozous pallidus</i>	None	None	G4	S3	-	Species of Special Concern	Casmalia, Orcutt, Twitchell Dam	Deserts, oak/pine forests, grasslands
Silver-haired bat	<i>Lasionycteris noctivagans</i>	None	None	G3G4	S3S4	-	None	Casmalia	Riparian boreal/coniferous/deciduous forests, rocky cliffs
Townsend's big-eared bat	<i>Corynorhinus townsendii</i>	None	None	G4	S2	-	Species of Special Concern	Casmalia, Orcutt	Montane forests, shrub/grasslands
Western red bat	<i>Lasiurus blossevillii</i>	None	None	G4	S3	-	Species of Special Concern	Orcutt, Casmalia	Riparian woodlands/forests, shrubs, caves
Yuma myotis	<i>Myotis yumanensis</i>	None	None	G5	S4	-	None	Orcutt, Casmalia	Juniper woodlands, coastal, riparian woodlands/grasslands, caves
<b>PLANTS</b>									

Common Name	Scientific Name	Federal Listing	State Listing	Global Rank	State Rank	Rare Plant Rating	CDFW Status	USGS Quad.	Habitats
Aparejo grass	<i>Muhlenbergia utilis</i>	None	None	G4	S2S3	2B.2	None	Sisquoc	Chaparral, cismontane woodland, coastal scrub, meadows/grasslands, marshes
Aphanisma	<i>Aphanisma blitoides</i>	None	None	G3G4	S2	1B.2	None	Point Sal, Casmalia	Coastal scrub/bluff scrub, coastal dunes
Beach spectaclepod	<i>Dithyrea maritima</i>	None	Threatened	G1	S1	1B.1	None	Casmalia, Point Sal	Coastal dunes, sandy coastal shrub
Black-flowered figwort	<i>Scrophularia atrata</i>	None	None	G2	S2	1B.2	None	Casmalia, Orcutt, Guadalupe, Point Sal	Closed-cone coniferous forest, chaparral, coastal dunes, coastal scrub, riparian scrub
Blochman's dudleya	<i>Dudleya blochmaniae</i> ssp. <i>blochmaniae</i>	None	None	G3T2	S2	1B.1	None	Point Sal, Guadalupe, Casmalia	Coastal bluff scrub, chaparral, coastal scrub, valley and foothill grassland
Blochman's leafy daisy	<i>Erigeron blochmaniae</i>	None	None	G2	S2	1B.2	None	Casmalia, Point Sal, Santa Maria	Coastal dunes and scrub
California saw-grass	<i>Cladium californicum</i>	None	None	G4	S2	2B.2	None	Orcutt, Sisquoc	Meadows, alkaline/freshwater swamps and marshes
Compact cobwebby thistle	<i>Cirsium occidentale</i> var. <i>compactum</i>	None	None	G3G4T2	S2	1B.2	None	Point Sal	Chaparral, coastal dunes/prairie/shrub
Crisp monardella	<i>Monardella undulata</i> ssp. <i>crispa</i>	None	None	G3T2	S2	1B.2	None	Guadalupe, Casmalia, Point Sal	Coastal dunes, coastal scrub
Dune larkspur	<i>Delphinium parryi</i> ssp. <i>blochmaniae</i>	None	None	G4T2	S2	1B.2	None	Orcutt, Santa Maria, Casmalia, Point Sal	Maritime chaparral, coastal dunes
Gambel's water cress	<i>Nasturtium gambelii</i>	Endangered	Threatened	G1	S1	1B.1	None	Orcutt, Casmalia	Brackish and freshwater marshes and swamps
Gaviota tarplant	<i>Deinandra increscens</i> ssp. <i>villosa</i>	Endangered	Endangered	G4G5T2	S2	1B.1	None	Casmalia, Point Sal	Coastal scrub/bluff scrub, valley and foothill grassland

Common Name	Scientific Name	Federal Listing	State Listing	Global Rank	State Rank	Rare Plant Rating	CDFW Status	USGS Quad.	Habitats
Hoover's bent grass	<i>Agrostis hooveri</i>	None	None	G2	S2	1B.2	None	Casmalia, Sisquoc, Orcutt	Closed-cone coniferous forest, chaparral, cismontane woodland, valley and foothill grassland
Kellogg's horkelia	<i>Horkelia cuneata</i> var. <i>sericea</i>	None	None	G4T1	S1	1B.1	None	Orcutt, Casmalia, Point Sal	Closed-cone coniferous forest, chaparral, coastal dunes, coastal scrub
La Graciosa thistle	<i>Cirsium scariosum</i> var. <i>loncholepis</i>	Endangered	Threatened	G5T1	S1	1B.1	None	Orcutt, Point Sal, Sisquoc, Guadalupe	Cismontane woodland, coastal dunes, coastal scrub, brackish marshes and swamps, valley and foothill grassland
La Purisima manzanita	<i>Arctostaphylos purissima</i>	None	None	G2	S2	1B.1	None	Casmalia, Sisquoc, Orcutt, Guadalupe, Point Sal	Sandy chaparral, coastal shrub
Lompoc yerba santa	<i>Eriodictyon capitatum</i>	Endangered	Rare	G2	S2	1B.2	None	Orcutt	Coastal bluff scrub, coniferous forest, maritime chaparral
Mesa horkelia	<i>Horkelia cuneata</i> var. <i>puberula</i>	None	None	G4T1	S1	1B.1	None	Sisquoc, Casmalia, Orcutt	Chaparral, Cismontane woodland, coastal scrub
Miles' milk-vetch	<i>Astragalus didymocarpus</i> var. <i>milesianus</i>	None	None	G5T2	S2	1B.2	None	Twitchell Dam	Coastal scrub
Refugio manzanita	<i>Arctostaphylos refugioensis</i>	None	None	G3	S3	1B.2	None	Sisquoc	Chaparral
San Bernardino aster	<i>Symphyotrichum defoliatum</i>	None	None	G2	S2	1B.2	None	Orcutt	Cismontane woodland, coastal scrub, coniferous forest, meadows, marshes and swamps, vernal valley foothill and grassland
San Luis Obispo monardella	<i>Monardella undulata</i> ssp. <i>undulata</i>	None	None	G2	S2	1B.2	None	Casmalia, Point Sal, Orcutt	Coastal dunes, sandy coastal scrub
Sand mesa manzanita	<i>Arctostaphylos rudis</i>	None	None	G2	S2	1B.2	None	Casmalia, Sisquoc, Point Sal, Guadalupe, Orcutt	Chaparral, coastal shrub

Common Name	Scientific Name	Federal Listing	State Listing	Global Rank	State Rank	Rare Plant Rating	CDFW Status	USGS Quad.	Habitats
Santa Barbara ceanothus	<i>Ceanothus impressus</i> var. <i>impressus</i>	None	None	G3T3	S3	1B.2	None	Casmalia, Guadalupe, Point Sal	Chaparral
Seaside bird's-beak	<i>Cordylanthus rigidus</i> ssp. <i>littoralis</i>	None	Endangered	G5T2	S2	1B.1	None	Casmalia	Closed-cone coniferous forest, chaparral, cismontane woodland, coastal dunes, coastal scrub
Southern curly-leaved monardella	<i>Monardella sinuata</i> ssp. <i>sinuate</i>	None	None	G3T2	S2	1B.2	None	Orcutt, Casmalia	Chaparral, cismontane woodland, coastal dunes, coastal scrub
Surf thistle	<i>Cirsium rhothophilum</i>	None	Threatened	G1	S1	1B.2	None	Point Sal, Casmalia	Coastal bluff scrub, Coastal dunes
<b>REPTILES</b>									
Coast horned lizard	<i>Phrynosoma blainvillii</i>	None	None	G3G4	S3S4	-	Species of Special Concern	Casmalia, Santa Maria, Twitchell Dam, Orcutt, Sisquoc, Point Sal	Mountains, valleys, foothills, grasslands, coniferous forests, woodlands, and chaparral, with open areas and patches of loose soil
Northern California legless lizard	<i>Anniella pulchra</i>	None	None	G3	S3	-	Species of Special Concern	Santa Maria, Casmalia, Guadalupe, Point Sal, Sisquoc, Orcutt, Twitchell Dam	Coastal dunes, coastal scrubs, scrub forests
Two-striped gartersnake	<i>Thamnophis hammondi</i>	None	None	G4	S3S4	-	Species of Special Concern	Casmalia, Point Sal	Aquatic, Riparian scrub
Western pond turtle	<i>Emys marmorata</i>	None	None	G3G4	S3	-	Species of Special Concern	Sisquoc, Santa Maria, Casmalia, Orcutt	Riparian scrub, aquatic areas, wetlands, vernal pools, ephemeral creeks, reservoirs, agricultural ditches, estuaries, brackish waters, marshes, swamps

Source: CDFW 2022

**Global/State Rarity Ranking**

G1/S1 – Critically imperiled. At very high risk of extinction due to extreme rarity (often 5 or fewer populations), very steep declines, or other factors.

G2/S2 – Imperiled. At high risk of extinction due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors.

G3/S3 – Vulnerable. At moderate risk of extinction due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors.

G4/S4 – Apparently Secure. Uncommon but not rare; some cause for long-term concern due to declines or other factors.

G5/S5 – Demonstrably Secure. Common; widespread and abundant.

**California Native Plant Society Rare Plant Rank**

CBR – Considered but Rejected

1B – Rare, threatened, or endangered in CA and elsewhere

2 – Rare, threatened, or endangered in CA but common elsewhere

4 – Limited distribution (Watch-list)

CBR – Considered but Rejected

CRPR Extensions

0.1 – Seriously endangered in California

0.2 – Fairly endangered in California

0.3 – Not very endangered in California

**USGS Quadrangle:** Locations where the species has historically been recorded by U.S. Geological Survey (USGS) quadrangle

**Table 3.4-3. Special-Status Natural Communities Occurring in the Santa Maria Valley**

Community Type	Community Name	Global Rank	State Rank	USGS Quad.
Herbaceous	Southern Vernal Pool	GNR	SNR	Santa Maria
Herbaceous	Valley Needlegrass Grassland	G3	S3.1	Point Sal
Inland Waters	Southern California Threespine Stickleback Stream	GNR	SNR	Orcutt
Scrub	Central Maritime Chaparral	G2	S2.2	Point Sal
Scrub	Central Dune Scrub	G2	S2.2	Casmalia, Guadalupe, Point Sal
Scrub	Central Foredunes	G1	S1.2	Casmalia, Point Sal

Source: CDFW 2022

**Global/State Rarity Ranking**

G1/S1 – Critically imperiled. At very high risk of extinction due to extreme rarity (often 5 or fewer populations), very steep declines, or other factors.

G2/S2 – Imperiled. At high risk of extinction due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors.

G3/S3 – Vulnerable. At moderate risk of extinction due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors.

G4/S4 – Apparently Secure. Uncommon but not rare; some cause for long-term concern due to declines or other factors.

G5/S5 – Demonstrably Secure. Common; widespread and abundant.

**USGS Quadrangle:** Locations where the species has historically been recorded by U.S. Geological Survey quadrangle

# Lompoc Valley Special Status Species and Sensitive Habitat

Table 3.4-4. Federally and State-Listed Wildlife Species Occurring in the Lompoc Valley

Common Name	Scientific Name	Federal Listing	State Listing	Global Rank	State Rank	Rare Plant Rating	CDFW Status	USGS Quad.	Habitats
<b>AMPHIBIANS</b>									
California red-legged frog	<i>Rana draytonii</i>	Threatened	None	G2G3	S2S3	-	Species of Special Concern	Lompoc, Lompoc Hills	Aquatic, artificial flowing waters, artificial standing waters, freshwater marsh, marsh and swamp, riparian forest, riparian scrub, riparian woodland, Sacramento/San Joaquin flowing waters, Sacramento/San Joaquin standing waters, South Coast flowing waters, South Coast standing waters, wetland
California tiger salamander	<i>Ambystoma californiense</i>	Endangered	Threatened	G2G3T2	S2	-	Watch List	Lompoc	Cismontane woodland, meadow and seep, Riparian woodland, valley and foothill grassland, vernal pool, wetland
Western spadefoot	<i>Spea hammondi</i>	None	None	G2G3	S3	-	Species of Special Concern	Lompoc	Mixed woodlands, grasslands, coastal sage scrub, chaparral, sandy washes, lowlands, river floodplains, alluvial fans, playas, alkali flats, foothills, mountains.
<b>BIRDS</b>									
American peregrine falcon	<i>Falco peregrinus anatum</i>	Delisted	Delisted	G4T4	S3S4	-	Fully Protected	Lompoc	Mountainous areas, river valleys, coastlines
<b>FISH</b>									
Steelhead – southern California distinct population segment (DPS)	<i>Oncorhynchus mykiss irideus</i>	Endangered	Candidate Endangered	G5T1Q	S1	-	None	Santa Rosa Hills	Aquatic, South Coast flowing waters
Tidewater goby	<i>Eucyclogobius newberryi</i>	Endangered	None	G3	S3	-	None	Lompoc	Aquatic, South Coast flowing waters
Unarmored threespine stickleback	<i>Gasterosteus aculeatus williamsoni</i>	Endangered	Endangered	G5T1	S1	-	Fully Protected	Lompoc Hills	Aquatic, South Coast flowing waters

Common Name	Scientific Name	Federal Listing	State Listing	Global Rank	State Rank	Rare Plant Rating	CDFW Status	USGS Quad.	Habitats
<b>INVERTEBRATES</b>									
Lompoc grasshopper	<i>Trimerotropis occulens</i>	None	None	G1G2	S1S2	-	None	Lompoc	Grasslands, gravelly/rocky ground
Monarch butterfly (California overwintering population)	<i>Danaus plexippus pop. 1</i>	Candidate	None	G4T2T3	S2S3	-	None	Lompoc Hills	Milkweed, flowering plants, Eucalyptus forest, dense tree cover (for overwintering)
Obscure bumble bee	<i>Bombus caliginosus</i>	None	None	G2G3	S1S2	-	None	Lompoc Hills	Grasslands, flowering plants
<b>MAMMALS</b>									
American badger	<i>Taxidea taxus</i>	None	None	G5	S3	-	Species of Special Concern	Lompoc, Lompoc Hills	Temperate/terrestrial grasslands, chaparral, and mountains; marshes
Pallid bat	<i>Antrozous pallidus</i>	None	None	G4	S3	-	Species of Special Concern	Lompoc Hills, Lompoc	Deserts, oak/pine forests, grasslands
San Diego desert woodrat	<i>Neotoma lepida intermedia</i>	None	None	G5T3T4	S3S4	-	Species of Special Concern	Lompoc	Rocky cliffs, desert, chaparral, juniper-sagebrush, creosote bush scrub, Joshua tree woodlands, scrub oak woodlands, and pinon-juniper woodlands.
Silver-haired bat	<i>Lasionycteris noctivagans</i>	None	None	G3G4	S3S4	-	None	Lompoc Hills	Riparian boreal/coniferous/deciduous forests, rocky cliffs
Yuma myotis	<i>Myotis yumanensis</i>	None	None	G5	S4	-	None	Lompoc	Juniper woodlands, coastal, riparian woodlands/grasslands, caves
<b>PLANTS</b>									
Black-flowered figwort	<i>Scrophularia atrata</i>	None	None	G2	S2	1B.2	None	Lompoc, Lompoc Hills, Santa Rosa Hills	Closed-cone coniferous forest, chaparral, coastal dunes, coastal scrub, riparian scrub
Chaparral ragwort	<i>Senecio aphanactis</i>	None	None	G3	S2	2B.2	None	Lompoc Hills, Lompoc	Chaparral, cismontane woodland, coastal scrub
Dune larkspur	<i>Delphinium parryi ssp. blochmaniae</i>	None	None	G4T2	S2	1B.2	None	Lompoc	Maritime chaparral, coastal dunes

Common Name	Scientific Name	Federal Listing	State Listing	Global Rank	State Rank	Rare Plant Rating	CDFW Status	USGS Quad.	Habitats
Eastwood's brittle-leaf manzanita	<i>Arctostaphylos crustacea</i> ssp. <i>eastwoodiana</i>	None	None	G4T2	S2	1B.1	None	Lompoc	Maritime and sandy chaparral
Hoover's bent grass	<i>Agrostis hooveri</i>	None	None	G2	S2	1B.2	None	Lompoc	Closed-cone coniferous forest, chaparral, cismontane woodland, valley and foothill grassland
La Graciosa thistle	<i>Cirsium scariosum</i> var. <i>loncholepis</i>	Endangered	Threatened	G5T1	S1	1B.1	None	Surf	Cismontane woodland, coastal dunes, coastal scrub, brackish marshes and swamps, valley and foothill grassland
La Purisima manzanita	<i>Arctostaphylos purissima</i>	None	None	G2	S2	1B.1	None	Lompoc Hills, Santa Rosa Hills	Sandy chaparral, coastal shrub
Late-flowered mariposa-lily	<i>Calochortus fimbriatus</i>	None	None	G3	S3	1B.3	None	Santa Rosa Hills	Chaparral, cismontane and riparian woodland
Lompoc yerba santa	<i>Eriodictyon capitatum</i>	Endangered	Rare	G2	S2	1B.2	None	Santa Rosa Hills	Coastal bluff scrub, coniferous forest, maritime chaparral
Mesa horkelia	<i>Horkelia cuneata</i> var. <i>puberula</i>	None	None	G4T1	S1	1B.1	None	Lompoc, Lompoc Hills	Chaparral, Cismontane woodland, coastal scrub
Miles' milk-vetch	<i>Astragalus didymocarpus</i> var. <i>milesianus</i>	None	None	G5T2	S2	1B.2	None	Lompoc	Coastal scrub
Pale-yellow layia	<i>Layia heterotricha</i>	None	None	G2	S2	1B.1	None	Lompoc	Cismontane woodland, coastal scrub, pinyon and juniper woodland, valley and foothill grassland
Refugio manzanita	<i>Arctostaphylos refugioensis</i>	None	None	G3	S3	1B.2	None	Lompoc Hills, Lompoc, Santa Rosa Hills	Chaparral
Robinson's pepper-grass	<i>Lepidium virginicum</i> var. <i>robinsonii</i>	None	None	G5T3	S3	4.3	None	Lompoc	Chaparral, coastal scrub
Sand mesa manzanita	<i>Arctostaphylos rudis</i>	None	None	G2	S2	1B.2	None	Lompoc Hills, Lompoc	Chaparral, coastal shrub
Santa Barbara ceanothus	<i>Ceanothus impressus</i> var. <i>impressus</i>	None	None	G3T3	S3	1B.2	None	Lompoc	Chaparral

Common Name	Scientific Name	Federal Listing	State Listing	Global Rank	State Rank	Rare Plant Rating	CDFW Status	USGS Quad.	Habitats
Santa Barbara honeysuckle	<i>Lonicera subspicata</i> var. <i>subspicata</i>	None	None	G5T2	S2	1B.2	None	Lompoc	Chaparral, Cismontane woodland, coastal scrub
Santa Ynez groundstar	<i>Ancistrocarphus keilii</i>	None	None	G1	S1	1B.1	None	Surf	Chaparral, cismontane woodland
Seaside bird's-beak	<i>Cordylanthus rigidus</i> ssp. <i>littoralis</i>	None	Endangered	G5T2	S2	1B.1	None	Lompoc, Santa Rosa Hills, Lompoc Hills	Closed-cone coniferous forest, chaparral, cismontane woodland, coastal dunes, coastal scrub
Southern curly-leaved monardella	<i>Monardella sinuata</i> ssp. <i>sinuate</i>	None	None	G3T2	S2	1B.2	None	Lompoc	Chaparral, cismontane woodland, coastal dunes, coastal scrub
Umbrella larkspur	<i>Delphinium umbraculorum</i>	None	None	G3	S3	1B.3	None	Santa Rosa Hills, Lompoc Hills	Chaparral, cismontane woodland
Vandenberg monkeyflower	<i>Diplacus vandenbergensis</i>	Endangered	None	G1	S1	1B.1	None	Lompoc	Chaparral, cismontane woodland, coastal dunes
White-veined monardella	<i>Monardella hypoleuca</i> ssp. <i>hypoleuca</i>	None	None	G4T3	S3	1B.3	None	Santa Rosa Hills	Chaparral, cismontane woodland
<b>REPTILES</b>									
Coast horned lizard	<i>Phrynosoma blainvillii</i>	None	None	G3G4	S3S4	-	Species of Special Concern	Lompoc	Mountains, valleys, foothills, grasslands, coniferous forests, woodlands, and chaparral, with open areas and patches of loose soil
Coast patch-nosed snake	<i>Salvadora hexalepis virgultea</i>	None	None	G5T4	S2S3	-	Species of Special Concern	Lompoc	Grassy foothills, rocky outcroppings
Northern California legless lizard	<i>Anniella pulchra</i>	None	None	G3	S3	-	Species of Special Concern	Lompoc, Santa Rosa Hills	Coastal dunes, coastal scrubs, scrub forests
Two-striped gartersnake	<i>Thamnophis hammondi</i>	None	None	G4	S3S4	-	Species of Special Concern	Lompoc Hills	Aquatic, riparian scrub
Western pond turtle	<i>Emys marmorata</i>	None	None	G3G4	S3	-	Species of Special Concern	Lompoc Hills, Lompoc	Riparian scrub, aquatic areas, wetlands, vernal pools, ephemeral creeks, reservoirs, agricultural ditches, estuaries, brackish waters, marshes, swamps

Source: CDFW 2022

**Global/State Rarity Ranking**

G1/S1 – Critically imperiled. At very high risk of extinction due to extreme rarity (often 5 or fewer populations), very steep declines, or other factors.

G2/S2 – Imperiled. At high risk of extinction due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors.

G3/S3 – Vulnerable. At moderate risk of extinction due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors.

G4/S4 – Apparently Secure. Uncommon but not rare; some cause for long-term concern due to declines or other factors.

G5/S5 – Demonstrably Secure. Common; widespread and abundant.

**California Native Plant Society Rare Plant Rank**

CBR – Considered but Rejected

1B – Rare, threatened, or endangered in CA and elsewhere

2 – Rare, threatened, or endangered in CA but common elsewhere

4 – Limited distribution (Watch-list)

CBR – Considered but Rejected

CRPR Extensions

0.1 – Seriously endangered in California

0.2 – Fairly endangered in California

0.3 – Not very endangered in California

**USGS Quadrangle:** Locations where the species has historically been recorded by U.S. Geological Survey quadrangle

**Table 3.4-5. Special-Status Natural Communities Occurring in the Lompoc Valley**

Community Type	Community Name	Global Rank	State Rank	USGS Quad.
Herbaceous	Southern Vernal Pool	GNR	SNR	Santa Rosa Hills, Surf, Lompoc, Lompoc Hills
Inland Waters	Southern California Steelhead Stream	GNR	SNR	Santa Rosa Hills
Riparian	Central Coast Arroyo Willow Riparian Forest	G3	S3.2	Surf
Riparian	Southern Cottonwood Willow Riparian Forest	G2	S3.2	Santa Rosa Hills, Lompoc
Riparian	Southern Willow Scrub	G3	S2.1	Lompoc, Lompoc Hills, Surf, Santa Rosa Hills
Scrub	Central Maritime Chaparral	G2	S2.2	Lompoc, Surf
Scrub	Central Dune Scrub	G2	S2.2	Point Sal, Surf

Source: CDFW 2022

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G5/S5 – Demonstrably Secure. Common; widespread and abundant.

**USGS Quadrangle:** Locations where the species has historically been recorded by U.S. Geological Survey quadrangle

# Santa Ynez Valley Special Status Species and Sensitive Habitat

**Table 3.4-6. Federally and State-Listed Wildlife Species Occurring in the Santa Ynez Valley**

Common Name	Scientific Name	Federal Listing	State Listing	Global Rank	State Rank	Rare Plant Rating	CDFW Status	USGS Quad.	Habitats
<b>AMPHIBIANS</b>									
Arroyo toad	<i>Anaxyrus californicus</i>	Endangered	None	G2G3	S2S3	-	Species of Special Concern	Foxen Canyon	Desert wash, riparian scrub, riparian woodland, South Coast flowing waters, South Coast standing waters
California red-legged frog	<i>Rana draytonii</i>	Threatened	None	G2G3	S2S3	-	Species of Special Concern	Foxen Canyon, Los Alamos, Santa Ynez, Solvang	Aquatic, artificial flowing waters, artificial standing waters, freshwater marsh, marsh and swamp, riparian forest, riparian scrub, riparian woodland, Sacramento/San Joaquin flowing waters, Sacramento/San Joaquin standing waters, South Coast flowing waters, South Coast standing waters, wetland
California tiger salamander	<i>Ambystoma californiense</i>	Endangered	Threatened	G2G3T2	S2	-	Watch List	Los Alamos, Los Olivos, Zaca Creek, Foxen Canyon	Cismontane woodland, meadow and seep, riparian woodland, valley and foothill grassland, vernal pool, wetland
Coast Range newt	<i>Taricha torosa</i>	None	None	G4	S4	-	Species of Special Concern	Santa Ynez	Wet forests, oak forests, chaparral, grasslands, oak woodland
Foothill yellow-legged frog	<i>Rana boylei</i>	None	Endangered	G3	S3	-	Species of Special Concern	Solvang	Aquatic, chaparral, cismontane woodland, coastal scrub, lower montane coniferous forest, meadow and seep, riparian forest, riparian woodland, Sacramento/San Joaquin flowing waters
<b>BIRDS</b>									
Bald eagle	<i>Haliaeetus leucocephalus</i>	Delisted	Endangered	G5	S3	-	Fully Protected	Lake Cachuma	Lower montane coniferous forest, old growth
Cooper's hawk	<i>Accipiter cooperii</i>	None	None	G5	S4	-	Watch List	Santa Ynez	Mature forest, open woodlands, wood edges, river groves
Ferruginous hawk	<i>Buteo regalis</i>	None	None	G4	S3S4	-	Watch List	Solvang	Lowlands, plateaus, valleys, plains, rolling hills of grass land, agricultural land, ranches, deserts

Common Name	Scientific Name	Federal Listing	State Listing	Global Rank	State Rank	Rare Plant Rating	CDFW Status	USGS Quad.	Habitats
Great blue heron	<i>Ardea Herodias</i>	None	None	G5	S4	-	None	Lake Cachuma	Marshes, swamps, shores, tideflats
Least Bell's vireo	<i>Vireo bellii pusillus</i>	Endangered	Endangered	G5T2	S2	-	None	Solvang	Riparian forest, riparian scrub, riparian woodland
Prairie falcon	<i>Falco mexicanus</i>	None	None	G5	S4	-	Watch List	Santa Ynez	Alpine tundra, shortgrass prairie, high desert
Purple martin	<i>Progne subis</i>	None	None	G5	S3	-	Species of Special Concern	Solvang, Santa Ynez	Marshes, swamps, wet meadows
Southwestern willow flycatcher	<i>Empidonax traillii extimus</i>	Endangered	Endangered	G5T2	S1	-	None	Solvang	Riparian woodland
Tricolored blackbird	<i>Agelaius tricolor</i>	None	Threatened	G1G2	S1S2	-	Species of Special Concern	Los Alamos, Los Olivos	Freshwater marsh, marsh and swamp, swamp, wetland
<b>FISH</b>									
Steelhead – southern California distinct population segment (DPS)	<i>Oncorhynchus mykiss irideus</i>	Endangered	Candidate Endangered	G5T1Q	S1	-	None	Santa Ynez	Aquatic, South Coast flowing waters
<b>INVERTEBRATES</b>									
Crotch's bumble bee	<i>Bombus crotchii</i>	None	None	G2	S1S2	-	None	Santa Ynez, Lake Cachuma, Los Olivos	Grasslands, shrublands, chaparral, coniferous forests
Obscure bumble bee	<i>Bombus caliginosus</i>	None	None	G2G3	S1S2	-	None	Los Olivos	Grasslands, flowering plants
<b>MAMMALS</b>									
American badger	<i>Taxidea taxus</i>	None	None	G5	S3	-	Species of Special Concern	Solvang, Los Alamos, Zaca Creek	Temperate/terrestrial grasslands, chaparral, and mountains; marshes
Pallid bat	<i>Antrozous pallidus</i>	None	None	G4	S3	-	Species of Special Concern	Solvang	Deserts, oak/pine forests, grasslands

Common Name	Scientific Name	Federal Listing	State Listing	Global Rank	State Rank	Rare Plant Rating	CDFW Status	USGS Quad.	Habitats
Townsend's big-eared bat	<i>Corynorhinus townsendii</i>	None	None	G4	S2	-	Species of Special Concern	Santa Ynez, Zaca Creek	Montane forests, shrub/grasslands
<b>PLANTS</b>									
Black-flowered figwort	<i>Scrophularia atrata</i>	None	None	G2	S2	1B.2	None	Solvang, Los Alamos	Closed-cone coniferous forest, chaparral, coastal dunes, coastal scrub, riparian scrub
Chaparral ragwort	<i>Senecio aphanactis</i>	None	None	G3	S2	2B.2	None	Santa Ynez	Chaparral, cismontane woodland, coastal scrub
Coulter's goldfields	<i>Lasthenia glabrata</i> ssp. <i>coulteri</i>	None	None	G4T2	S2	1B.1	None	Santa Ynez	Coastal salt marshes and swamps, playas, vernal pools
Davidson's saltscale	<i>Atriplex serenana</i> var. <i>davidsonii</i>	None	None	G5T1	S1	1B.2	None	Zaca Creek,	Coastal scrub, coastal bluff scrub
Dune larkspur	<i>Delphinium parryi</i> ssp. <i>blochmaniae</i>	None	None	G4T2	S2	1B.2	None	Los Alamos	Maritime chaparral, coastal dunes
Hoover's bent grass	<i>Agrostis hooveri</i>	None	None	G2	S2	1B.2	None	Zaca Creek	Closed-cone coniferous forest, chaparral, cismontane woodland, valley and foothill grassland
La Purisima manzanita	<i>Arctostaphylos purissima</i>	None	None	G2	S2	1B.1	None	Los Alamos, Solvang	Sandy chaparral, coastal shrub
Late-flowered mariposa-lily	<i>Calochortus fimbriatus</i>	None	None	G3	S3	1B.3	None	Lake Cachuma, Santa Ynez, Solvang	Chaparral, cismontane and riparian woodland
Mesa horkelia	<i>Horkelia cuneata</i> var. <i>puberula</i>	None	None	G4T1	S1	1B.1	None	Solvang, Zaca Creek, Los Alamos	Chaparral, cismontane woodland, coastal scrub
Miles' milk-vetch	<i>Astragalus didymocarpus</i> var. <i>milesianus</i>	None	None	G5T2	S2	1B.2	None	Zaca Creek	Coastal scrub
Ojai fritillary	<i>Fritillaria ojaiensis</i>	None	None	G3	S3	1B.2	None	Solvang, Lake Cachuma, Santa Ynez	Forest, chaparral, cismontane woodland, coniferous forest
Pale-yellow layia	<i>Layia heterotricha</i>	None	None	G2	S2	1B.1	None	Lake Cachuma	Cismontane woodland, coastal scrub, pinyon and juniper woodland, valley and foothill grassland

Common Name	Scientific Name	Federal Listing	State Listing	Global Rank	State Rank	Rare Plant Rating	CDFW Status	USGS Quad.	Habitats
Refugio manzanita	<i>Arctostaphylos refugioensis</i>	None	None	G3	S3	1B.2	None	Lake Cachuma, Santa Ynez, Solvang	Chaparral
Sand mesa manzanita	<i>Arctostaphylos rudis</i>	None	None	G2	S2	1B.2	None	Los Alamos	Chaparral, coastal shrub
Santa Barbara ceanothus	<i>Ceanothus impressus</i> var. <i>impressus</i>	None	None	G3T3	S3	1B.2	None	Los Alamos	Chaparral
Santa Barbara honeysuckle	<i>Lonicera subspicata</i> var. <i>subspicata</i>	None	None	G5T2	S2	1B.2	None	Santa Ynez	Chaparral, Cismontane woodland, coastal scrub
Santa Barbara jewelflower	<i>Caulanthus amplexicaulis</i> var. <i>barbarae</i>	None	None	G4T2	S2	1B.1	None	Los Olivos, Zaca Lake	Closed-cone coniferous forest, chaparral, cismontane woodland
Santa Ynez groundstar	<i>Ancistrocarphus kelli</i>	None	None	G1	S1	1B.1	None	Los Alamos	Chaparral, cismontane woodland
Seaside bird's-beak	<i>Cordylanthus rigidus</i> ssp. <i>littoralis</i>	None	Endangered	G5T2	S2	1B.1	None	Los Alamos, Santa Ynez	Closed-cone coniferous forest, chaparral, cismontane woodland, coastal dunes, coastal scrub
Southern curly-leaved monardella	<i>Monardella sinuata</i> ssp. <i>sinuate</i>	None	None	G3T2	S2	1B.2	None	Los Alamos, Zaca Creek	Chaparral, cismontane woodland, coastal dunes, coastal scrub
Umbrella larkspur	<i>Delphinium umbracolorum</i>	None	None	G3	S3	1B.3	None	Zaca Lake, Los Olivos, Santa Ynez, Lake Cachuma	Chaparral, cismontane woodland
Vandenberg monkeyflower	<i>Diplacus vanderbergensis</i>	Endangered	None	G1	S1	1B.1	None	Los Alamos	Chaparral, cismontane woodland, coastal dunes
White-veined monardella	<i>Monardella hypoleuca</i> ssp. <i>hypoleuca</i>	None	None	G4T3	S3	1B.3	None	Solvang, Santa Ynez	Chaparral, cismontane woodland
<b>REPTILES</b>									
Coast horned lizard	<i>Phrynosoma blainvillii</i>	None	None	G3G4	S3S4	-	Species of Special Concern	Santa Ynez, Sisquoc	Mountains, valleys, foothills, grasslands, coniferous forests, woodlands, and chaparral, with open areas and patches of loose soil

Common Name	Scientific Name	Federal Listing	State Listing	Global Rank	State Rank	Rare Plant Rating	CDFW Status	USGS Quad.	Habitats
Coast patch-nosed snake	<i>Salvadora hexalepis virgultea</i>	None	None	G5T4	S2S3	-	Species of Special Concern	Lake Cachuma	Grassy foothills, rocky outcroppings
Northern California legless lizard	<i>Anniella pulchra</i>	None	None	G3	S3	-	Species of Special Concern	Lake Cachuma, Zaca Creek, Los Olivos, Los Alamos	Coastal dunes, coastal scrubs, scrub forests
Two-striped gartersnake	<i>Thamnophis hammondi</i>	None	None	G4	S3S4	-	Species of Special Concern	Los Olivos, Santa Ynez, Solvang	Aquatic, riparian scrub
Western pond turtle	<i>Emys marmorata</i>	None	None	G3G4	S3	-	Species of Special Concern	Lake Cachuma, Santa Ynez, Solvang	Riparian scrub, aquatic areas, wetlands, vernal pools, ephemeral creeks, reservoirs, agricultural ditches, estuaries, brackish waters, marshes, swamps

Source: CDFW 2022

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1B – Rare, threatened, or endangered in CA and elsewhere

2 – Rare, threatened, or endangered in CA but common elsewhere

4 – Limited distribution (Watch-list)

CBR – Considered but Rejected

CRPR Extensions

0.1 – Seriously endangered in California

0.2 – Fairly endangered in California

0.3 – Not very endangered in California

**USGS Quadrangle:** Locations where the species has historically been recorded by U.S. Geological Survey quadrangle

**Table 3.4-7. Special-Status Natural Communities Occurring in the Santa Ynez Valley**

Community Type	Community Name	Global Rank	State Rank	USGS Quad.
Herbaceous	Southern Vernal Pool	GNR	SNR	Lake Cachuma, Zaca Creek, Solvang, Santa Ynez
Riparian	Southern Coast Live Oak Riparian Forest	G4	S4	Santa Ynez, Solvang
Riparian	Southern Cottonwood Willow Riparian Forest	G2	S3.2	Solvang, Santa Ynez
Riparian	Southern Willow Scrub	G3	S2.1	Solvang, Santa Ynez

Source: CDFW 2022

**Global/State Rarity Ranking**

G1/S1 – Critically imperiled. At very high risk of extinction due to extreme rarity (often 5 or fewer populations), very steep declines, or other factors.

G2/S2 – Imperiled. At high risk of extinction due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors.

G3/S3 – Vulnerable. At moderate risk of extinction due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors.

G4/S4 – Apparently Secure. Uncommon but not rare; some cause for long-term concern due to declines or other factors.

G5/S5 – Demonstrably Secure. Common; widespread and abundant.

**USGS Quadrangle:** Locations where the species has historically been recorded by U.S. Geological Survey quadrangle

# Cuyama Valley Special Status Species and Sensitive Habitat

Table 3.4-8. Federally and State-Listed Wildlife Species Occurring in the Cuyama Valley

Common Name	Scientific Name	Federal Listing	State Listing	Global Rank	State Rank	Rare Plant Rating	CDFW Status	USGS Quad.	Habitats
<b>AMPHIBIANS</b>									
California red-legged frog	<i>Rana draytonii</i>	Threatened	None	G2G3	S2S3	-	Species of Special Concern	Taylor Canyon	Aquatic, artificial flowing waters, artificial standing waters, freshwater marsh, marsh and swamp, riparian forest, riparian scrub, riparian woodland, Sacramento/San Joaquin flowing waters, Sacramento/San Joaquin standing waters, South Coast flowing waters, South Coast standing waters, wetland
Western spadefoot	<i>Spea hammondi</i>	None	None	G2G3	S3	-	Species of Special Concern	Miranda Pine Mountain	Mixed woodlands, grasslands, coastal sage scrub, chaparral, sandy washes, lowlands, river floodplains, alluvial fans, playas, alkali flats, foothills, mountains.
<b>BIRDS</b>									
Prairie falcon	<i>Falco mexicanus</i>	None	None	G5	S4	-	Watch List	New Cuyama	Alpine tundra, shortgrass prairie, high desert
Short-eared owl	<i>Asio flammeus</i>	None	None	G5	S3	-	Species of Special Concern	Cuyama	Open country, grasslands
Tricolored blackbird	<i>Agelaius tricolor</i>	None	Threatened	G1G2	S1S2	-	Species of Special Concern	New Cuyama, Cuyama	Freshwater marsh, marsh and swamp, swamp, wetland
<b>INVERTEBRATES</b>									
Crotch's bumble bee	<i>Bombus crotchii</i>	None	None	G2	S1S2	-	None	New Cuyama, Cuyama	Grasslands, shrublands, chaparral, coniferous forests
Kern primrose sphinx moth	<i>Euproserpinus euterpe</i>	Threatened	None	G1G2	S1	-	None	Cuyama Peak, New Cuyama	Valley and foothill grassland
<b>MAMMALS</b>									
American badger	<i>Taxidea taxus</i>	None	None	G5	S3	-	Species of Special Concern	Cuyama	Temperate/terrestrial grasslands, chaparral, mountains, and marshes

Common Name	Scientific Name	Federal Listing	State Listing	Global Rank	State Rank	Rare Plant Rating	CDFW Status	USGS Quad.	Habitats
Giant kangaroo rat	<i>Dipodomys ingens</i>	Endangered	Endangered	G1G2	S1S2	-	None	New Cuyama, Cuyama	Chenopod scrub, valley and foothill grassland
Nelson's (San Joaquin) antelope squirrel	<i>Ammospermophilus nelsoni</i>	None	Threatened	G2G3	S2S3	-	None	Cuyama	Chenopod scrub
San Joaquin kit fox	<i>Vulpes macrotis mutica</i>	Endangered	Threatened	G4T2	S2	-	None	New Cuyama, Cuyama, Cuyama Peak	Chenopod scrub, valley and foothill grassland
<b>PLANTS</b>									
Blakley's spineflower	<i>Chorizanthe blakleyi</i>	None	None	G2	S2	1B.3	None	New Cuyama, Peak Mountain	Chaparral, pinyon and juniper woodland
California jewelflower	<i>Caulanthus californicus</i>	Endangered	Endangered	G1	S1	1B.1	None	New Cuyama, Cuyama, Cuyama Peak	Chenopod scrub, pinyon and juniper woodland, valley and foothill grassland
Hoover's eriastrum	<i>Eriastrum hooveri</i>	Delisted	None	G3	S3	4.2	None	Cuyama	Chenopod scrub, pinyon and juniper woodland, valley and foothill grassland
Kern mallow	<i>Eremalche parryi</i> ssp. <i>kernensis</i>	Endangered	None	G3G4T3	S3	1B.2	None	Cuyama	Chenopod scrub, pinyon and juniper woodland, valley and foothill grassland
La Panza mariposa-lily	<i>Calochortus simulans</i>	None	None	G2	S2	1B.3	None	Miranda Pine Mountain, Bates Canyon	Chaparral, cismontane woodland, coniferous forest, valley and foothill grassland
Lemmon's jewelflower	<i>Caulanthus lemmonii</i>	None	None	G3	S3	1B.2	None	Cuyama, New Cuyama, Cuyama Peak	Pinyon and juniper woodland, valley and foothill grassland
Mt. Pinos onion	<i>Allium howellii</i> var. <i>clokeyi</i>	None	None	G4T2	S2	1B.3	None	Ballinger Canyon	Traverse Range region in granitic soils at high elevations
Pale-yellow layia	<i>Layia heterotricha</i>	None	None	G2	S2	1B.1	None	Bates Canyon, Fox Mountain	Cismontane woodland, coastal scrub, pinyon and juniper woodland, valley and foothill grassland
Recurved larkspur	<i>Delphinium recurvatum</i>	None	None	G2	S2	1B.2	None	Cuyama Peak	Chenopod scrub, cismontane woodland, valley and foothill grassland
San Joaquin woollythreads	<i>Monolopia congdonii</i>	Endangered	None	G2	S2	1B.2	None	Cuyama, New Cuyama	Chenopod scrub, valley and foothill grassland

Common Name	Scientific Name	Federal Listing	State Listing	Global Rank	State Rank	Rare Plant Rating	CDFW Status	USGS Quad.	Habitats
Showy golden madia	<i>Madia radiata</i>	None	None	G3	S3	1B.1	None	Cuyama	Cismontane woodland, valley and foothill grassland
Stinkbells	<i>Fritillaria agrestis</i>	None	None	G3	S3	4.2	None	Cuyama	Chaparral, cismontane woodland, pinyon and juniper woodland, valley and foothill grassland
<b>REPTILES</b>									
Blunt-nosed leopard lizard	<i>Gambelia sila</i>	Endangered	Endangered	G1	S1	-	Fully Protected	Cuyama, Cuyama Peak, New Cuyama	Chenopod scrub
California glossy snake	<i>Arizona elegans occidentalis</i>	None	None	G5T2	S2	-	Species of Special Concern	Cuyama	Grasslands, chaparral, deserts, scrub, scrub forest
Coast horned lizard	<i>Phrynosoma blainvillii</i>	None	None	G3G4	S3S4	-	Species of Special Concern	Cuyama Peak, New Cuyama	Mountains, valleys, foothills, grasslands, coniferous forests, woodlands, and chaparral, with open areas and patches of loose soil
Northern California legless lizard	<i>Anniella pulchra</i>	None	None	G3	S3	-	Species of Special Concern	New Cuyama	Coastal dunes, coastal scrubs, scrub forests
Western pond turtle	<i>Emys marmorata</i>	None	None	G3G4	S3	-	Species of Special Concern	Peak Mountain	Riparian scrub, aquatic areas, wetlands, vernal pools, ephemeral creeks, reservoirs, agricultural ditches, estuaries, brackish waters, marshes, swamps

Source: CDFW 2022

**Global/State Rarity Ranking**

G1/S1 – Critically imperiled. At very high risk of extinction due to extreme rarity (often 5 or fewer populations), very steep declines, or other factors.

G2/S2 – Imperiled. At high risk of extinction due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors.

G3/S3 – Vulnerable. At moderate risk of extinction due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors.

G4/S4 – Apparently Secure. Uncommon but not rare; some cause for long-term concern due to declines or other factors.

G5/S5 – Demonstrably Secure. Common; widespread and abundant.

**California Native Plant Society Rare Plant Rank**

CBR – Considered but Rejected

1B – Rare, threatened, or endangered in CA and elsewhere

2 – Rare, threatened, or endangered in CA but common elsewhere

CRPR Extensions

0.1 – Seriously endangered in California

0.2 – Fairly endangered in California

4 – Limited distribution (Watch-list)  
 CBR – Considered but Rejected

0.3 – Not very endangered in California

**USGS Quadrangle:** Locations where the species has historically been recorded by U.S. Geological Survey quadrangle

## South Coast Special Status Species and Sensitive Habitat

**Table 3.4-9. Federally and State-Listed Wildlife Species Occurring in the South Coast**

Common Name	Scientific Name	Federal Listing	State Listing	Global Rank	State Rank	Rare Plant Rating	CDFW Status	USGS Quad.	Habitats
<b>AMPHIBIANS</b>									
California red-legged frog	<i>Rana draytonii</i>	Threatened	None	G2G3	S2S3	-	Species of Special Concern	Santa Barbara, Goleta, San Marcos Pass, Gaviota, Tajiguas, Dos Pueblos Canyon	Aquatic, artificial flowing waters, artificial standing waters, freshwater marsh, marsh and swamp, riparian forest, riparian scrub, riparian woodland, Sacramento/San Joaquin flowing waters, Sacramento/San Joaquin standing waters, South Coast flowing waters, South Coast standing waters, wetland
Coast Range newt	<i>Taricha torosa</i>	None	None	G4	S4	-	Species of Special Concern	Santa Barbara, Goleta, Gaviota, San Marcos Pass, Dos Pueblos Canyon, Sacate	Wet forests, oak forests, chaparral, grasslands, oak woodland
Foothill yellow-legged frog	<i>Rana boylei</i>	None	Endangered	G3	S3	-	Species of Special Concern	Carpinteria, San Marcos Pass, Tajiguas	Aquatic, chaparral, cismontane woodland, coastal scrub, lower montane coniferous forest, meadow and seep, riparian forest, riparian woodland, Sacramento/San Joaquin flowing waters
<b>BIRDS</b>									
Bank swallow	<i>Riparia riparia</i>	None	Threatened	G5	S2	-	None	Santa Barbara, Goleta	Riparian scrub, riparian woodland
Belding's savannah sparrow	<i>Passerculus sandwichensis beldingi</i>	None	Endangered	G5T3	S3	-	None	Goleta, Carpinteria	Marsh and swamp, wetland

Common Name	Scientific Name	Federal Listing	State Listing	Global Rank	State Rank	Rare Plant Rating	CDFW Status	USGS Quad.	Habitats
Bell's sage sparrow	<i>Artemisiospiza belli belli</i>	None	None	G5T2T3	S3	-	Watch List	Goleta	Sagebrush, saltbush, chamise, other low shrubs
Black-crowned night heron	<i>Nycticorax nycticorax</i>	None	None	G5	S4	-	None	Santa Barbara	Wetlands such as swamps, streams, rivers, marshes, mud flats, overgrown lake edges
Burrowing owl	<i>Athene cunicularia</i>	None	None	G4	S3	-	Species of Special Concern	Goleta, Dos Pueblos Canyon	Grasslands, rangelands, agricultural areas, deserts
California black rail	<i>Laterallus jamaicensis coturniculus</i>	None	Threatened	G3T1	S1	-	Fully Protected	Santa Barbara	Brackish marsh, freshwater marsh, marsh and swamp, salt marsh, wetland
California brown pelican	<i>Pelecanus occidentalis californicus</i>	Delisted	Delisted	G4T3T4	S3	-	Fully Protected	Santa Barbara, Goleta, Dos Pueblos Canyon, Tajiguas	Offshore islands, rocky and vegetated coastal areas, mountainous slopes
California least tern	<i>Sternula antillarum browni</i>	Endangered	Endangered	G4T2T3Q	S2	-	Fully Protected	Santa Barbara, Dos Pueblos Canyon	Alkali playa, wetland
Cooper's hawk	<i>Accipiter cooperii</i>	None	None	G5	S4	-	Watch List	Santa Barbara, Goleta, Dos Pueblos Canyon	Mature forest, open woodlands, wood edges, river groves
Double-crested cormorant	<i>Nannopterum auritum</i>	None	None	G5	S4	-	Watch List	Goleta	Rivers, lakes, coastal areas
Ferruginous hawk	<i>Buteo regalis</i>	None	None	G4	S3S4	-	Watch List	Dos Pueblos Canyon	Lowlands, plateaus, valleys, plains, rolling hills of grass land, agricultural land, ranches, deserts
Golden eagle	<i>Aquila chrysaetos</i>	None	None	G5	S3	-	Fully Protected, Watch List	San Marcos Pass	Tundra, grasslands, intermittent forested habitat and woodland-brushlands, arid deserts and canyonlands
Grasshopper sparrow	<i>Ammodramus savannarum</i>	None	None	G5	S3	-	Species of Special Concern	Goleta	Grasslands
Great blue heron	<i>Ardea Herodias</i>	None	None	G5	S4	-	None	Goleta	Marshes, swamps, shores, tideflats
Great egret	<i>Ardea alba</i>	None	None	G5	S4	-	None	Goleta	Lakes, wetlands

Common Name	Scientific Name	Federal Listing	State Listing	Global Rank	State Rank	Rare Plant Rating	CDFW Status	USGS Quad.	Habitats
Least Bell's vireo	<i>Vireo bellii pusillus</i>	Endangered	Endangered	G5T2	S2	-	None	San Marcos Pass, Carpinteria	Riparian forest, riparian scrub, riparian woodland
Light-footed Ridgway's rail	<i>Rallus obsoletus levipes</i>	Endangered	Endangered	G3T1T2	S1	-	Fully Protected	Goleta, Carpinteria	Marsh and swamp, salt marsh, wetland
Prairie falcon	<i>Falco mexicanus</i>	None	None	G5	S4	-	Watch List	San Marcos Pass	Alpine tundra, shortgrass prairie, high desert
Snowy egret	<i>Egretta thula</i>	None	None	G5	S4	-	None	Santa Barbara	Wetlands, marshes, riverbanks, lakesides, pools, salt marshes, estuaries
Southern California rufous-crowned sparrow	<i>Aimophila ruficeps canescens</i>	None	None	G5T3	S3	-	Watch List	Goleta, Gaviota, Dos Pueblos Canyon	Coastal sagebrush, open chaparral, scrub oaks, pinyon pine
Tricolored blackbird	<i>Agelaius tricolor</i>	None	Threatened	G1G2	S1S2	-	Species of Special Concern	Goleta	Freshwater marsh, marsh and swamp, swamp, wetland
Western snowy plover	<i>Charadrius alexandrinus nivosus</i>	Threatened	None	G3T3	S2	-	Species of Special Concern	Santa Barbara, Carpinteria, Goleta, Dos Pueblos Canyon, Tajiguas	Sand shore, wetland
White-tailed kite	<i>Elanus leucurus</i>	None	None	G5	S3S4	-	Fully Protected	Goleta, Dos Pueblos Canyon	Savannas, open woodlands, marshes, desert grasslands, partially cleared lands, and cultivated fields
Yellow rail	<i>Coturnicops noveboracensis</i>	None	None	G4	S1S2	-	Species of Special Concern	Santa Barbara	Shallow freshwater sedge marshes, wet meadows and marshes with cordgrass, saltgrass, sedges, other low vegetation
<b>FISH</b>									

Common Name	Scientific Name	Federal Listing	State Listing	Global Rank	State Rank	Rare Plant Rating	CDFW Status	USGS Quad.	Habitats
Tidewater goby	<i>Eucyclogobius newberryi</i>	Endangered	None	G3	S3	-	None	Carpinteria, Santa Barbara, Gaviota, Sacate, Goleta, Dos Pueblos Canyon, Tajiguas, Goleta	Aquatic, South Coast flowing waters
Steelhead – southern California distinct population segment (DPS)	<i>Oncorhynchus mykiss irideus</i>	Endangered	Candidate Endangered	G5T1Q	S1	-	None	Gaviota, Carpinteria, Santa Barbara,	Aquatic, South Coast flowing waters
<b>INVERTEBRATES</b>									
California linderiella	<i>Linderiella occidentalis</i>	None	None	G2G3	S2S3	-	None	Goleta	Valley and foothill grassland, vernal pool, wetland
Crotch's bumble bee	<i>Bombus crotchii</i>	None	None	G2	S1S2	-	None	Goleta, Santa Barbara, San Marcos Pass, Gaviota, Dos Pueblos Canyon, Carpinteria	Grasslands, shrublands, chaparral, coniferous forests
Globose dune beetle	<i>Coelus globosus</i>	None	None	G1G2	S1S2	-	None	Santa Barbara, Goleta, Carpinteria, Dos Pueblos Canyon	Coastal dunes
Mimic tryonia (California brackishwater snail)	<i>Tryonia imitator</i>	None	None	G2	S2	-	None	Goleta	Coastal lagoons, estuaries, salt marshes

Common Name	Scientific Name	Federal Listing	State Listing	Global Rank	State Rank	Rare Plant Rating	CDFW Status	USGS Quad.	Habitats
Monarch butterfly (California overwintering population)	<i>Danaus plexippus pop. 1</i>	Candidate	None	G4T2T3	S2S3	-	None	Sacate, Goleta, Carpinteria, Santa Barbara, Dos Pueblos Canyon, Tajiguas	Milkweed, flowering plants, Eucalyptus forest, dense tree cover (for overwintering)
Sandy beach tiger beetle	<i>Cicindela hirticollis gravida</i>	None	None	G5T2	S2	-	None	Carpinteria, Dos Pueblos Canyon	Sandy beaches, littoral-riparian areas
Wandering (saltmarsh) skipper	<i>Panoquina errans</i>	None	None	G4G5	S2	-	None	Carpinteria	Ocean bluffs, coastal open areas, disjunct salt marsh
<b>MAMMALS</b>									
American badger	<i>Taxidea taxus</i>	None	None	G5	S3	-	Species of Special Concern	Gaviota, Sacate, Tajiguas	Temperate/terrestrial grasslands, chaparral, and mountains, marshes
Big free-tailed bat	<i>Nyctinomops macrotis</i>	None	None	G5	S3	-	Species of Special Concern	Santa Barbara	Rocky cliffs, terrestrial plants (pines, firs, and desert shrubs), chaparral, scrub forest, and coastal
Hoary bat	<i>Lasiurus cinereus</i>	None	None	G3G4	S4	-	None	Goleta	Grasslands, woodlands, chaparral, coniferous forests, deserts
Pallid bat	<i>Antrozous pallidus</i>	None	None	G4	S3	-	Species of Special Concern	Sacate, Goleta	Deserts, oak/pine forests, grasslands
San Diego desert woodrat	<i>Neotoma lepida intermedia</i>	None	None	G5T3T4	S3S4	-	Species of Special Concern	Goleta, Gaviota, Tajiguas	Rocky cliffs, desert, chaparral, juniper-sagebrush, creosote bush scrub, Joshua tree woodlands, scrub oak woodlands, and pinon-juniper woodlands.
Townsend's big-eared bat	<i>Corynorhinus townsendii</i>	None	None	G4	S2	-	Species of Special Concern	Carpinteria, Santa Barbara, Dos Pueblos Canyon	Montane forests, shrub/grasslands
Western mastiff bat	<i>Eumops perotis californicus</i>	None	None	G4G5T4	S3S4	-	Species of Special Concern	Goleta	Chaparral, forest, scrub forest, coastal and desert scrublands, annual and perennial grasslands, conifer and deciduous woodlands, palm oases

Common Name	Scientific Name	Federal Listing	State Listing	Global Rank	State Rank	Rare Plant Rating	CDFW Status	USGS Quad.	Habitats
Western red bat	<i>Lasiurus blossevillii</i>	None	None	G4	S3	-	Species of Special Concern	Goleta	Riparian woodlands/forests, shrubs, caves
Yuma myotis	<i>Myotis yumanensis</i>	None	None	G5	S4	-	None	Goleta	Juniper woodlands, coastal, riparian woodlands/grasslands, caves
<b>PLANTS</b>									
Black-flowered figwort	<i>Scrophularia atrata</i>	None	None	G2	S2	1B.2	None	Santa Barbara, Goleta, Gaviota, Dos Pueblos Canyon	Closed-cone coniferous forest, chaparral, coastal dunes, coastal scrub, riparian scrub
Chaparral ragwort	<i>Senecio aphanactis</i>	None	None	G3	S2	2B.2	None	Sacate	Chaparral, cismontane woodland, coastal scrub
Contra Costa goldfields	<i>Lasthenia conjugens</i>	Endangered	None	G1	S1	1B.1	None	Goleta	Cismontane woodland, playas, valley and foothill grassland, vernal pools
Coulter's goldfields	<i>Lasthenia glabrata</i> ssp. <i>coulteri</i>	None	None	G4T2	S2	1B.1	None	Goleta, Carpinteria	Coastal salt marshes and swamps, playas, vernal pools
Coulter's saltbush	<i>Atriplex coulteri</i>	None	None	G3	S1S2	1B.2	None	Goleta, Carpinteria, Santa Barbara	Coastal bluff scrub, coastal dunes, coastal scrub, valley/foothill grasslands
Davidson's saltscale	<i>Atriplex serenana</i> var. <i>davidsonii</i>	None	None	G5T1	S1	1B.2	None	Goleta, Santa Barbara, Gaviota	Coastal scrub, coastal bluff scrub
Estuary seablite	<i>Suaeda esteroa</i>	None	None	G3	S2	1B.2	None	Goleta	Coastal salt marshes and swamps
Gambel's water cress	<i>Nasturtium gambelii</i>	Endangered	Threatened	G1	S1	1B.1	None	Santa Barbara	Brackish and freshwater marshes and swamps
Gaviota tarplant	<i>Deinandra increscens</i> ssp. <i>villosa</i>	Endangered	Endangered	G4G5T2	S2	1B.1	None	Gaviota, Sacate	Coastal scrub/bluff scrub, valley and foothill grassland
Late-flowered mariposa-lily	<i>Calochortus fimbriatus</i>	None	None	G3	S3	1B.3	None	Santa Barbara, Carpinteria, Sacate, Goleta, San Marcos Pass	Chaparral, cismontane and riparian woodland

Common Name	Scientific Name	Federal Listing	State Listing	Global Rank	State Rank	Rare Plant Rating	CDFW Status	USGS Quad.	Habitats
Lompoc yerba santa	<i>Eriodictyon capitatum</i>	Endangered	Rare	G2	S2	1B.2	None	Sacate	Coastal bluff scrub, coniferous forest, maritime chaparral
Mesa horkelia	<i>Horkelia cuneata</i> var. <i>puberula</i>	None	None	G4T1	S1	1B.1	None	Santa Barbara, Goleta, Dos Pueblos Canyon	Chaparral, cismontane woodland, coastal scrub
Miles' milk-vetch	<i>Astragalus didymocarpus</i> var. <i>milesianus</i>	None	None	G5T2	S2	1B.2	None	Gaviota	Coastal scrub
Nuttall's scrub oak	<i>Quercus Dumosa</i>	None	None	G3	S3	1B.1	None	Carpinteria, Santa Barbara	Coniferous forest, chaparral, coastal scrub
Ojai fritillary	<i>Fritillaria ojaiensis</i>	None	None	G3	S3	1B.2	None	Santa Barbara, San Marcos Pass, Carpinteria	Forest, chaparral, cismontane woodland, coniferous forest
Pale-yellow layia	<i>Layia heterotricha</i>	None	None	G2	S2	1B.1	None	Goleta	Cismontane woodland, coastal scrub, pinyon and juniper woodland, valley and foothill grassland
Refugio manzanita	<i>Arctostaphylos refugioensis</i>	None	None	G3	S3	1B.2	None	Gaviota, Goleta, Sacate	Chaparral
Salt marsh bird's-beak	<i>Chloropyron maritimum</i> ssp. <i>maritimum</i>	Endangered	Endangered	G4T1	S1	1B.2	None	Carpinteria	Coastal dunes, coastal salt marshes and swamps
Santa Barbara honeysuckle	<i>Lonicera subspicata</i> var. <i>subspicata</i>	None	None	G5T2	S2	1B.2	None	Goleta, Santa Barbara, Gaviota, Carpinteria, Tajiguas, San Marcos Pass, Dos Pueblos Canyon	Chaparral, cismontane woodland, coastal scrub
Santa Barbara morning-glory	<i>Calystegia sepium</i> ssp. <i>binghamiae</i>	None	None	G5TXQ	SX	1A	None	Santa Barbara	Coastal marshes and swamps

Common Name	Scientific Name	Federal Listing	State Listing	Global Rank	State Rank	Rare Plant Rating	CDFW Status	USGS Quad.	Habitats
Sonoran maiden fern	<i>Thelypteris puberula</i> var. <i>sonorensis</i>	None	None	G5T3	S2	2B.2	None	Santa Barbara, Goleta, Carpinteria, Gaviota, Tajiguas	Meadows and streams
Southern tarplant	<i>Centromadia parryi</i> ssp. <i>australis</i>	None	None	G3T2	S2	1B.1	None	Goleta, Dos Pueblos Canyon	Marshes and swamps, vernal valley and foothill grassland, vernal pools
Umbrella larkspur	<i>Delphinium umbraculorum</i>	None	None	G3	S3	1B.3	None	Santa Barbara, Carpinteria, San Marcos Pass	Chaparral, cismontane woodland
White-veined monardella	<i>Monardella hypoleuca</i> ssp. <i>hypoleuca</i>	None	None	G4T3	S3	1B.3	None	Santa Barbara, Carpinteria, Tajiguas, Dos Pueblos Canyon, San Marcos Pass	Chaparral, cismontane woodland
<b>REPTILES</b>									
California legless lizard	<i>Anniella</i> spp.	None	None	G3G4	S3S4	-	Species of Special Concern	Carpinteria	Coastal dunes, coastal shrubs, maritime chaparral, scrub forest
Coast horned lizard	<i>Phrynosoma blainvillii</i>	None	None	G3G4	S3S4	-	Species of Special Concern	Santa Barbara, San Marcos Pass	Mountains, valleys, foothills, grasslands, coniferous forests, woodlands, and chaparral, with open areas and patches of loose soil
Coast patch-nosed snake	<i>Salvadora hexalepis virgultea</i>	None	None	G5T4	S2S3	-	Species of Special Concern	Santa Barbara, Goleta, Carpinteria	Grassy foothills, rocky outcroppings
Northern California legless lizard	<i>Anniella pulchra</i>	None	None	G3	S3	-	Species of Special Concern	Santa Barbara, Goleta, San Marcos Pass, Dos Pueblos Canyon	Coastal dunes, coastal scrubs, scrub forests
Two-striped gartersnake	<i>Thamnophis hammondi</i>	None	None	G4	S3S4	-	Species of Special Concern	Santa Barbara, Carpinteria, Gaviota, San Marcos Pass	Aquatic, Riparian scrub

Common Name	Scientific Name	Federal Listing	State Listing	Global Rank	State Rank	Rare Plant Rating	CDFW Status	USGS Quad.	Habitats
Western pond turtle	<i>Emys marmorata</i>	None	None	G3G4	S3	-	Species of Special Concern	Santa Barbara, Goleta, Gaviota, Sacate, San Marcos Pass, Tajiguas	Riparian scrub, aquatic areas, wetlands, vernal pools, ephemeral creeks, reservoirs, agricultural ditches, estuaries, brackish waters, marshes, swamps

Source: CDFW 2022

**Global/State Rarity Ranking**

G1/S1 – Critically imperiled. At very high risk of extinction due to extreme rarity (often 5 or fewer populations), very steep declines, or other factors.

G2/S2 – Imperiled. At high risk of extinction due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors.

G3/S3 – Vulnerable. At moderate risk of extinction due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors.

G4/S4 – Apparently Secure. Uncommon but not rare; some cause for long-term concern due to declines or other factors.

G5/S5 – Demonstrably Secure. Common; widespread and abundant.

**California Native Plant Society Rare Plant Rank (CRPR)**

CBR – Considered but Rejected

1B – Rare, threatened, or endangered in CA and elsewhere

2 – Rare, threatened, or endangered in CA but common elsewhere

4 – Limited distribution (Watch-list)

CBR – Considered but Rejected

CRPR Extensions

0.1 – Seriously endangered in California

0.2 – Fairly endangered in California

0.3 – Not very endangered in California

**USGS Quadrangle:** Locations where the species has historically been recorded by U.S. Geological Survey quadrangle

**Table 3.4-10. Special-Status Natural Communities Occurring in the South Coast**

Community Type	Community Name	Global Rank	State Rank	USGS Quad.
Herbaceous	Valley Needlegrass Grassland	G3	S3.1	Gaviota
Marsh	Southern Coastal Salt Marsh	G2	S2.1	Carpinteria, Goleta

Source: CDFW 2022

**Global/State Rarity Ranking**

G1/S1 – Critically imperiled. At very high risk of extinction due to extreme rarity (often 5 or fewer populations), very steep declines, or other factors.

G2/S2 – Imperiled. At high risk of extinction due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors.

G3/S3 – Vulnerable. At moderate risk of extinction due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors.

G4/S4 – Apparently Secure. Uncommon but not rare; some cause for long-term concern due to declines or other factors.

G5/S5 – Demonstrably Secure. Common; widespread and abundant.

**USGS Quadrangle:** Locations where the species has historically been recorded by U.S. Geological Survey quadrangle

**APPENDIX E**  
**VMT CALCULATIONS**



Associated Transportation Engineers #23001  
VMT Worksheet

AGRICULTURAL ENTERPRISE ORDINANCE PROJECT

Use	Size	New Sites	Total	Daily Use %	Daily Use	ADT Rate	ADT	Day Trip%	Day Trip Length (a)	Local VMT	Regional %	Regional Length (b)	Regional VMT	Total VMT
<b>PROPOSED LODGING</b>														
Campgrounds (<100 ac)	15 Sites	10	150	85%	128	2.03	260	50%	10	1,300	50%	64	8,344	9,644
Campgrounds (100-320 ac)	20 Sites	15	300	85%	255	2.03	518	50%	10	2,590	50%	64	16,625	19,215
Campgrounds (≥320 ac)	30 Sites	15	450	85%	383	2.03	777	50%	10	3,885	50%	64	24,937	28,822
Farmstay	4 Bedrooms	30	120	85%	102	3.35	342	50%	10	1,710	50%	64	10,976	12,686
Farmstay	6 Bedrooms	30	180	85%	153	3.35	513	50%	10	2,565	50%	64	16,464	19,029
<b>Subtotal</b>		100	1,200				<b>2,410</b>			<b>12,050</b>			<b>77,346</b>	<b>89,396</b>

Use	Size	New Sites	Max per Year	Annual Total	ADT Rate	ADT	AADT	Local %	Within County Length (c)	Local VMT	Regional %	Out of County Length (d)	Regional VMT	Total VMT
<b>PROPOSED TOURS/EVENTS</b>														
Small Tour	15 Attendees	30	128	57,600	1.00	57,600	158	75%	26	3,122	25%	77	3,034	6,156
Other Education (≤100 ac)	80 Attendees	20	24	38,400	1.00	38,400	105	75%	26	2,075	25%	77	2,016	4,091
Other Education (100-320 ac)	120 Attendees	20	24	57,600	1.00	57,600	158	75%	26	3,122	25%	77	3,034	6,156
Other Education (≥320 ac)	150 Attendees	20	24	72,000	1.00	72,000	197	75%	26	3,893	25%	77	3,782	7,675
Fishing/Hunting	20 Participants	5	100	10,000	1.00	10,000	27	75%	26	534	25%	77	518	1,052
Horseback Riding	24 Participants	20	100	48,000	1.00	48,000	132	75%	26	2,609	25%	77	2,534	5,143
Small-Scale Events	80 Attendees	25	12	24,000	1.00	24,000	66	50%	26	870	50%	77	2,534	3,404
Small-Scale Events	120 Attendees	25	12	36,000	1.00	36,000	99	50%	26	1,304	50%	77	3,802	5,106
Small-Scale Events	150 Attendees	25	12	45,000	1.00	45,000	123	50%	26	1,621	50%	77	4,723	6,344
<b>Subtotal</b>		190		388,600			<b>1,065</b>			<b>19,150</b>			<b>25,977</b>	<b>45,127</b>

<b>TOTALS</b>							<b>3,475</b>			<b>31,200</b>			<b>103,323</b>	<b>134,523</b>
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(a) Day trips assume 10 miles per trip to local area.

(b) Regional length assumes 75% of visitors travel from out of County at 77 miles per trip and 25% of visitors are within the County at 27 miles per trip, average of 52 miles.

(c) Assumes weighted average of length per trip for visitors within County (See below).

(d) Assumes weighted average of length per trip for visitors from out of County (See below).

	Percent	Distance
<b>Local Day Trips in Area</b>		
Local	100%	10 Miles
<b>In SB County</b>		
Carpinteria	10%	41 Miles
Santa Barbara	20%	30 Miles
Goleta	15%	30 Miles
Santa Ynez/Buellton/Solvang (a)	20%	6 Miles
Lompoc	15%	25 Miles
Santa Maria	20%	34 Miles
<b>Weighted Average</b>		<b>26 Miles</b>
<b>Out of SB County</b>		
Los Angeles	25%	125 Miles
Ventura	40%	57 Miles
San Luis Obispo	35%	65 Miles
<b>Weighted Average</b>		<b>77 Miles</b>

(a) Accounts for guests staying locally before/after attending events/tours/activities.