

# County of San Luis Obispo Agricultural Liaison Advisory Board



**Agricultural Liaison  
Advisory Board (ALAB)**

2156 Sierra Way, Suite A  
San Luis Obispo, CA 93401  
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## Positions/Members/Terms

CHAIR: Dee Lacey

VICE CHAIR: Jean-Pierre Wolff

District One: Mecham Appt.  
Dee Lacey (1/13)

District Two: Gibson Appt.  
Lisen Bonnier (1/11)

District Three: Hill Appt.  
Tom Ikeda (1/13)

District Four: Achadjian Appt.  
Bill Struble (1/11)

District Five: Patterson Appt.  
Noah Small (1/13)

Ag. Finance Rep.  
Mark Pearce (8/10)

Cattlemen Rep.  
Dick Nock

Coastal San Luis RCD Rep.  
Jean-Pierre Wolff (8/11)

Direct Marketing/Organic Rep.  
Eric Michielssen (4/12)

Environmental Rep.  
Debra Garrison (1/11)

Farm Bureau Rep.  
R. Don Warden

Nursery Rep.  
David Pruitt (4/12)

Upper Salinas-Las Tablas RCD Rep.  
Charles Pritchard (1/14)

Vegetable Rep.  
Richard Quandt (4/12)

Wine Grape Rep.  
Neil Roberts (4/12)

County Agricultural Commissioner  
Bob Lilley  
*Ex-Officio*

U.C. Coop. Extension Farm Advisor  
Mary Bianchi  
*Ex-Officio*

October 12, 2010

Karen Nall  
Department of Planning and Building  
976 Osos Street, Room 300  
San Luis Obispo, CA 93408

RE: File Number: LRP2004-00016 GPA/Special Events

Dear Ms. Nall:

The Agricultural Liaison Advisory Board (ALAB) appreciates the opportunity to review and comment on the latest proposed event ordinance draft dated September, 2010. At our September 13, 2010 meeting ALAB members discussed the latest draft. No specific motions were made. This letter is intended to convey the range of thoughts from ALAB members as to concerns, problems or impacts with the latest proposal. They included the following:

### **INSURANCE AND INDEMNITY**

- It is not clear when the indemnity and insurance requirements apply or what the purpose is for these requirements specific to events. ALAB requests clarification regarding when the Tax Collector is involved with a license for events, the purpose of the requirements and when the requirements would apply to a proposed event site.
  - Insurance and indemnity requirements could be costly, or insurance carriers may find listing the County as an additional insured to be unreasonable.
  - Insurance and indemnity requirements could create a precedent for the County to require similar requirements for other types of permits. Such a requirement places the property owner in a position where the County may settle litigation in a manner that is not in the property owner's interest.

### **SETBACKS**

- Setback distances from property lines are overly onerous for sites seeking to host events and are not always necessary.
- Setbacks depend upon what is located on the other side of the property line.

### **SITE SPECIFICITY**

- Events should be considered on a case by case basis (discretionary) as a one size fits all procedure does not work.

- Why are standards necessary on sites where no neighboring properties would be affected? If you have no impact to any resource you should be able to be exempt from the event standards.

### **TOURS AND EDUCATION**

- Additional waivers from the standards should be provided so farmers and ranchers or all private property owners could hold tours or educational events without meeting any set standards or obtaining any type of permit or license.

### **NEIGHBOR NOTIFICATION**

- Could neighbor notification apply from the edge of the event site rather than from the edge of the site (property line)?

### **EVENT DEFINITION**

- The definition of events remains unclear, specifically with regard to clearly exempting private gatherings from ordinance standards. The definition needs to be fixed so that it is clear that private events are not regulated.

### **WINERY IMPACTS**

- Some winery owners believe that this proposal which grants a large number of ministerial events on a single site would cut into the winery events which can only occur once a site has obtained a discretionary permit.

### **AGRICULTURE POLICY 6**

- Does the proposed level of ministerial events comply with Agriculture Policy 6?

At a meeting in February, 2010, ALAB unanimously supported the following standards for event sites approved with a ministerial permit:

- 1) include a 200 foot buffer to adjoining property lines,
- 2) ensure parking areas are free of combustible material,
- 3) preclude parking within the public right of way, and
- 4) provide notification for nearby property owners

ALAB also unanimously supported making the following revisions to the previous proposal:

- 1) elimination of preclusion of parking on Class 1 soil,
- 2) frequency of events should be limited to no more than 6 events per year;
- 3) number of attendees should be reduced to [between] 50 –200 (excluding staff), and
- 4) no new permanent structures be allowed for event use.

Additional comments received from members subsequent to the September 13, 2010 ALAB meeting:

Purpose of the County standards for events: Ensure compatibility with surrounding residential and agriculture uses.

**Comment: County standards should not limit events on ranches where there are no impacts on neighbors or agricultural operations. These are likely the most ideal locations for events that boost the local economy and the county's agricultural and tourism profile.**

Proposed ordinance: Would allow up to 2,000 attendees on a site located one mile from the ranch property line. Over 2,000 would require a CUP.

**Comment: Why limit the number on large ranches where there are no impacts? Sites one mile or more from the property line should have no limit on number of attendees, number of events or hours of operation.**

Proposed Ordinance: Neighbors within 1,000 feet of property lines must be notified about each event.

**Comment: The notification should be for neighbors 1,000 feet of the actual event site.**

Proposed Ordinance: Definition states an event is any use of a site for an organized activity, assembly or event that is open to the public, either with or without invitation, involving 50 or more people.

**Comment: This statement needs to be changed to clearly address the Board of Supervisors' direction that private gatherings are not "events" regulated by this ordinance.**

Proposed Ordinance: Events and/or programs are exempt when offered by a valid agricultural nonprofit organization and are solely and specifically for the purposes of education about on-site agriculture or natural resources.

**Comment: Educational events and programs offered by individual farmers and ranchers should also be exempt. This includes trail rides and other traditional ranch activities. AGP 6 states that farmers and ranchers need the ability to showcase their operations with the public and to showcase the industry as part of doing business. One way to do so is with on-site tours, trail rides and events.**

Proposed Ordinance: The use of existing structures temporarily during events is limited to existing structures that are permitted for commercial and public assembly and are in compliance with ADA where applicable.

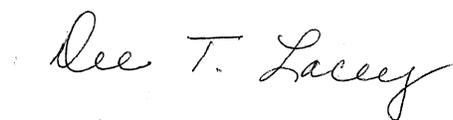
**Comment: We support the option of waiving this requirement when the applicable fire agency verifies the structure is safe.**

Proposed Ordinance includes regulations for urban and village areas.

**Comment: This is confusing. The major focus of this ordinance is on events on agricultural lands. Events on Commercial/Retail properties should be considered separately.**

ALAB looks forward to further review of a modified ordinance based upon the comments you receive and based upon the completion of environmental review.

Sincerely,

A handwritten signature in cursive script that reads "Dee T. Lacey".

Dee T. Lacey  
Chair, Agricultural Liaison Advisory Board