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Ramirez, Angelica

Public Comment

**From:** Andy Caldwell <andy@colabsbc.org>  
**Sent:** Friday, November 5, 2021 7:48 AM  
**To:** sbcob  
**Cc:** Hartmann, Joan; Hart, Gregg; Williams, Das; Lavagnino, Steve; Nelson, Bob; Miyasato, Mona  
**Subject:** COLAB Public Comment D-3 Nov. 9, 2021 Climate Vulnerability  
**Attachments:** climateclaire.pdf



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Board of Supervisors Meeting 11/9/21  
Item D-3

Dear Supervisors,

At yesterday's Ag Advisory Committee meeting, your P and D Staff complained about the lack of ag and industry involvement in the Climate Change Vulnerability Study.

Why would the level of participation be less than optimal?

People often "vote with their feet" ....consider it a vote of NO CONFIDENCE!

I went to a couple of these meetings and could tell that the entire exercise was equivalent to the business and ag community being tied to the tracks as the train engine warmed up for its run!!!

The Old Resource Management Dept is back, alive and well, with a focus on command and control approaches versus collaboration and consultation with the regulated community.

Attached is the Grower Shippers comment letter which characterizes our situation quite well.

In a nutshell, county priorities, rules and regulations will PREVENT adaption to future vulnerabilities and in fact, the myriad of rules and regulations in place now are hindering adaptations currently to the many problems facing ag, business and residents, not the least of which is ANNUAL CONFLAGRATIONS of 50-100 years worth of built up fuel! For crying out loud, California has over 140 million dead trees, and if you would have us believe they died from climate change versus a hands off approach to forest management, then you are the problem!

Another example? Bluff erosion in IV....been happening for decades...adaption? Sea walls and shoring! NOT ALLOWED!!!

You have forgotten the first rule of governance, consent of the governed, as the county and state mandate restrictions on the cost and availability of water, labor, fuel, housing, electricity and the like, all the while blaming us for not cooperating with the agenda!

Andy Caldwell  
COLAB



October 22, 2021

Whitney Wilkinson  
Long Range Planning Division  
County of Santa Barbara  
Comprehensive Plan, Safety Element  
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Re: Draft Climate Change Vulnerability Assessment (CCVA)

Dear County Staff and PlaceWorks Consultants:

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 are alarmed by the draft's assessment's focus on fatalistic characterizations, rather than meaningful collaboration with stakeholders towards proactive problem-solving. We understand the CCVA is part of a broader planning effort but believe greater care should be taken in laying its foundational approach. In many places the assessment fails to recognize the County's own contributions to vulnerability and undermining adaptability. We urge a fundamental shift in approach driven by greater receptiveness to feedback from diverse viewpoints including the private sector and tremendous potential for advancement through respectful partnership rather than divisive, unfounded assumptions.

The draft falls short in several broader issues:

1. Overall, the tone of the draft is overwhelming negative and focuses on worst-case scenarios. Decisions made from a place of fear, anxiety, or "emotional hijack" do not result in creative problem-solving. We encourage the report to be reframed as balanced, proactive, and solutions-oriented. We are concerned that the foundational tone will ultimately result in regulatory mandates that will exacerbate many of the problems envisioned and more.
2. Throughout the draft, the assessment does not recognize or incorporate existing regulations and mitigating factors that are already in place.
3. The format of the document is very confusing, redundant, and hard to follow, which makes it difficult to further provide constructive comment on the draft. The visual-only column headers are confusing.
4. The County's own policies and regulations should be examined as a barrier to resilience; these policies and management choices create vulnerability, not "from the absence of capacity to adapt," but from the ability to implement adaptive strategies due to overly burdensome regulations.
5. In many places, the draft fails to recognize adaptive capacity or to outline cascading positives/significant opportunities for synergistic benefits. For example, proactive vegetative fuel load management, which has been dangerously absent in the past few decades (in some cases due to misguided environmental concern), decreases the severity of catastrophic wildfires. Catastrophic wildfires result in greater smoke exposure, increased recovery time for ecosystems, hydrophobic

“moonscapes,” reservoir siltation, and hydrophobic particle deposition in streams and rivers reducing groundwater infiltration. The extent of damage can be reduced through proactive management. Another example is the management of invasive species, such as arundo and tamarisk; management of these invasive species would reduce wildfire risk, increase water availability, and improve ecosystem health.

6. Given the tremendous subjectivity and lack of coherence of the assessment format, we urge the focus to be on the County’s role in facilitating solutions and addressing its own created impediments to solutions, rather than taking a punitive approach.
7. The draft references the Paycheck Protection Program as an economic driver in several places. This was a short-term federal program related to COVID-19 and should not be relied upon in a multi-decade County planning document rather than a local, long-term industry sector.

Additional specific comments on the draft include:

1. ES-13. Although it has been a participant in the process, the County is not the party developing groundwater sustainability plans; these are being developed by the Groundwater Sustainability Agencies for each basin.
2. ES-15. Public Works is also an important agricultural partner. The Ag Commissioner’s Office should be included in the consideration of Economic Drivers and Emergency Management.
3. Page 3. The County’s self-sufficiency goals should include domestic agriculture, rather than reliance on international imports. It may not be feasible for food, energy, and water sources to be carbon-free; is the manufacture, transportation, and installation of solar panels or wind turbines carbon-free over its lifecycle? We agree with the need for efficiency, preparedness, sustainability, and resilience and challenge the County to identify and eliminate barriers within its powers to these goals.
4. Page 13. Pesticide use is not synonymous with and should not be confused with pesticide exposure. Additionally, the dataset references reported use in 2012-2014; many advances and materials prohibitions have occurred in the past decade since the data was collected and might not be representative of current or future use patterns. Additionally, the use of certain products such as those treating mildew may improve with the envisioned conditions.
5. Using average annual temperatures for projected highs seems to have limited utility, since stresses to people, the environment, and crops would come during periods of extreme temperatures.
6. Page 14 Table 3. We question the accuracy of the figures in Table 3.
7. Page 85. We support the importance of vegetation and wildfire management as it pertains to preserving water storage capacity and preventing hydrophobic burn scars and reservoir/stream siltation as a result of catastrophic, unmanaged wildfires. We encourage the County to engage with USFS on national forest management since policies upstream will impact the future storage capacity of Twitchell Reservoir and Cachuma Reservoir. We encourage the County to promote policies and engage with federal jurisdictions to protect County assets from antiquated vegetation and fire management policies.
8. Page 86, Table 17. Although it is impossible to predict, it is possible that certain pests and diseases such as powdery mildew might improve with warmer, drier conditions.
9. Page 87. Basin hydrology and geology is different for each basin and the risk of saltwater intrusion may not be applicable in all basins.
10. Page 93. The alleged stressor “availability of educational opportunities” does not accurately reflect the tremendous talent, advancements, and future plans of outstanding public and private K-12 educational programs, Allan Hancock College, USCB, and other plans to promote local and distance learning in our communities. For example, Hancock has recently and dramatically expanded its tuition assistance programs.
11. Page 94. We would add the County’s own policies and regulatory culture to the list of stressors “making it more difficult for [economic drivers] to prepare for climate change hazards and increasing

the severity of impacts.” There are cascading regulations that make agile adaptations nearly impossible.

12. Page 96. The plan references several urban planning documents. Although referenced later in the document, the draft needs to be further adapted to the rural communities in Santa Barbara County; for example, electric well pumps, limited rural internet connectivity, and intermittent telecom create vulnerabilities regardless of race.
13. Page 98. This table does not recognize the current regulatory protections offered under Cal/OSHA’s heat illness prevention requirements or wildfire smoke standards, among others. Additionally, although it’s not clear what the threshold for “hazardous” conditions are, there may be limited circumstances when it is not possible to delay agricultural work but protection mechanisms are provided in the referenced standards.
14. Page 104-105. Table 19 is confusing, arbitrary, and inaccurate. For example, what is the rationale behind stating that “Persons without a high school degree” are less vulnerable to wildfires than any other population? This is one tiny example of the many factual and rational shortcomings of this table and approach.
15. Page 106. This is another example of a missed opportunity to proactively address potential problems by fatalistically concluding there are no alternatives. There may be no *existing* alternatives but planning, implementation, and other measures can mitigate damage and have cascading benefits. For example, new water infrastructure projects can help to control flooding, increase groundwater recharge, and prevent downstream flooding and roads and bridges washing out. New and improved roads can create emergency escape options and ease congestion during times of emergency evacuation.
16. Page 107. County representatives participating in SBCAG should advocate for additional representation of North County needs in the Resiliency Assessment priority list, such as Main St/SR-166, and Betteravia Rd.
17. Page 108. The County controls its budget allocations and prioritization as a stressor and partnership with other jurisdictions and funding sources; we encourage the County to prioritize infrastructure construction, repairs, and deferred maintenance in its County budget allocations.
18. Page 110. We have heard concerns that further electrification efforts without commensurate grid improvements will cause further problems with electricity generation and distribution problems. The County must facilitate diverse sources of energy, including fuel-powered generators, to provide guaranteed uptime for essential functions such as medical equipment, irrigation equipment, and fresh produce cooling/cold storage. For example, irrigation reservoirs for avocado orchards have proven essential during many firefighting efforts on the South Coast.
19. Page 111. We encourage the author to consult with Public Works, IRWMP, and SGMA GSAs to expand upon this cut-and-paste language to local needs, conditions, and opportunities for creative solutions.
20. Page 115-117. Reservoirs should be added to the list. Dams and reservoirs may be used for flood control purposes but also groundwater recharge, which mitigates drought but depends on the specific situation. There are also flood control structures and opportunities for groundwater recharge that are not dams. Public Works, IRWMP, and the SGMA GSAs could provide additional information and insight. As mentioned previously, reservoirs may also assist with wildfire suppression efforts.
21. Page 124. The recent trend of high cost, limited coverage, and cancellation of fire insurance and other types of liability insurance should be flagged as an issue for the County’s policy platform to address at the state and federal levels.
22. Page 126. The impact of pests and diseases could improve or worsen depending on the specific circumstances of the pest and microclimate. There are already workplace protections regarding wildfire smoke and heat illness prevention through Cal/OSHA. There is adaptive capacity if the County and other regulatory agencies will work proactively with agriculturalists and their partners to implement improvements and reduce barriers to problem-solving. We see vector-borne diseases referenced throughout; we are not aware of this currently being a widespread problem and are not sure if it’s worthy of the focus in the report since it’s not a reasonably foreseeable outcome on the Central

Coast. What is important is the County's continued support at the local, state, and federal level for pest detection and exclusion programs facilitated through the Ag Commissioner's office.

23. Page 128.

- a. "Resistance... to change in business practices" is a blatantly false statement. Agriculture is continually adapting and innovating; misguided regulations is a major obstacle to future resilience.
- b. It would be more correct to identify the stressor as "Lack of alternative crops that can economically support the extremely high cost of doing business in Santa Barbara County."
- c. "Difficulty in relocation" would be more accurately described as "competition from and relocation to other counties, states, and countries with fewer regulatory constraints and lower cost of doing business."
- d. "Large scale economic fluctuations: changes to economic sectors or recessions" is not a particularly accurate statement. With a few exceptions, agriculture generally faces different economic cycles that are not usually linked to the typical real estate, stock market, and consumer cycles.
- e. See previous comments on Cal/OSHA regulations and other comments regarding the accuracy and applicability of the following: "Vector-borne illness, extreme heat, and smoke from wildfires can harm outdoor workers, preventing operations from functioning adequately."
- f. See previous comments regarding policies supporting guaranteed uptime and generators instead of "power shut-offs that prevent wells and other infrastructure from functioning properly."
- g. We believe the comment "...there may be resistance from the community even if these options were available" is either inaccurate or taken out of context. If there is an economically and technically feasible alternative that works better, adoption by agriculturalists is likely. If the comment is referencing the regulatory or public community's resistance to technology advancements like plant protection materials or genetic advancements as a hazard, that should be clarified.

24. Page 132. See previous comments regarding visual column headers and subjectivity of assessment and limitations.

25. Page 133. See previous comments regarding missed opportunity to capitalize on cascading benefits.

26. Page 136. Presumptuously dismisses the potential of SGMA and does not recognize current basin adjudications. Basin hydrology and geology is different for each basin and the risk of saltwater intrusion may not be applicable in all basins.

27. Page 148. Assistance should be equitable throughout the county and adapted to local needs, not just focused on the South Coast. Why is the South Coast called out specifically when there are likely households in need in the Cuyama Valley, Santa Ynez Valley, and Gaviota Coast that do not currently have access to weatherization and cooling systems. These are the communities mapped to have higher temperatures in the nearer future and may or may not currently have access to weatherization or cooling systems.

28. Page 149-Wildfire. We are concerned that the draft's current language on wildfire only uses the word "enforcement" for defensible space and places the blame and burden on individual residents and abandons them on broader policy issues. As mentioned previously, the draft falls short in identifying the County's potential leadership role in mitigating the impact of wildfire through fuel load management and wildfire mitigation within its own land use jurisdiction. Additionally, there is tremendous need for the County to champion for its residents in interactions with the Los Padres National Forest and other regulatory agencies and organizations that are obstacles to balanced land management policies.

29. Page 149-Agriculture. See previous comments on Cal/OSHA regulatory protections for wildfire smoke. Additionally, the draft also overlooks the County's own contributions to stressors. The following is a more accurate representation of the realities, needs, and circumstances:

"Agriculture remains a major economic driver in the County, representing a significant source of income, employment, and community contributions. Agricultural workers, many some of whom

already face ~~numerous~~ non-climate stressors, are likely to face economic hardships from reduced agricultural productivity or agriculture moving from Santa Barbara County to other counties, states, and countries, exacerbating inequities in the county and lost income and employment. Continued agricultural productivity depends on 1) County policies that promote a vibrant agricultural economy in Santa Barbara County 2) ~~crops' and other products' ability to resist~~ County policies and policy platforms that enable agriculture to proactively adapt to changing climate conditions, 2) "hardening" agricultural operations to prevent or lessen damage (e.g., to drought and wildfire) and supporting water supply enhancement efforts and guaranteed uptime for essential inputs, and 3) providing agricultural operators with tools and resources to quickly recover from disasters."

30. Page 153. Emergency Management-Agricultural resources (coolers, reservoirs, irrigation infrastructure, orchards, vineyards) must be identified as an asset worthy of protecting in emergency planning. Agency and Nonprofit Coordination-Fuel load management should be added to this section, as well as increased water storage and infiltration.

Thank you for your responsiveness to these comments as we work collectively to secure the future for agriculture in Santa Barbara County.

Sincerely,



Claire Wineman  
President