

Lenzi, Chelsea

From: Villalobos, David
Sent: Monday, December 02, 2013 8:13 AM
To: Board Letters
Subject: FW: Gaviota Coast Plan update

From: Bill Giorgi [mailto:billgiorgi@gmail.com]
Sent: Saturday, November 30, 2013 10:17 AM
To: Farr, Doreen; Farnum, Elizabeth; SupervisorCarbajal; Wolf, Janet; Adam, Peter; Lavagnino, Steve; Villalobos, David
Subject: Gaviota Coast Plan update

Dear Supervisor Farr:

As I am sure you know since my family's ranch is in the GCP area, I have followed the GCP update very closely and have spent much of my last three years participating and reviewing information. I know most of the plan details very well. I wanted to relay to you some of my major concerns for your consideration before the meeting. I hope you have a chance to read this as I am sure you will be inundated with information. Please remember while reading through and considering the plan, the intent and vision of the community was to have a balanced plan and to protect and enhance Ag productivity. The county staff's changes to the community plan has blinded this vision. I hope you as our elected representative will address this on behalf of your Ag community which will be directly affected by this plan.

There are several overriding issues that I must mention before I get into my more detailed concerns. The first is that you started this process out as a community plan and appointed people to the Gav Pac that represented various views in the community and the county at large. The process was proceeding along fine until county staff imploded it, coming in at the last minute and trying to turn the community process into a county staff plan! Staff backed off to some degree when there was a huge public out cry at some of the meetings. However, there are still many things that were recommended by the Gav Pac, community members, and other county entities that staff continues to ignore, continuing to make this "their" plan! The Planning Commission corrected some of that, but much remains. The dropped issues should at least be studied in the EIR. Since I mentioned the Planning Commission, I would like to mention FYI that I was very disappointed in your appointee to the commission, as she as chairperson chose to give activist groups a special consideration of 20 minutes of time for a presentation. This was after the AAC had requested that one of their members be able to sit at the table with staff while reviewing the Ag section of the GCP to help answer any questions that may come up regarding the Ag issues, and she ruled not to. It is very disappointing when you don't get a fair shake in the public process.

The next overriding issue is the use of an urban community plan for a large rural area with no true community. This has presented many challenges, especially for the urban planners on staff. This was complicated even more by developing a planning boundary on a watershed basis, rather than on a historical geographic region basis. This put almost half of the plan area in the coastal zone with a different set of rules. Given that 93% of the plan area was zoned for agriculture, It was extremely disappointing that staff over this long process choose not to involve the Ag Planner or the Agricultural Advisory Committee until the very end of the process. This made it almost impossible for them to provide input and was why they ask for a representative to be able to sit at the table with staff. It was only thanks to some dedicated members giving up time from their busy schedules, that the AAC was able to be involved, at all in the process. A county policy should be developed and considered by

the Board of Supervisors that gives staff better direction regarding this issue. By the way, Sharyne has been very helpful in this process. This leads to the last overriding issue.

If the county is going to continue to use community plans in the large rural areas, there needs to be a major paradigm shift in the way staff processes these plans that takes into account the fact that these are not urban planning areas, they are rural areas with issues unique to them and have much different needs than an urban plan does. I would like to advise the Board of Supervisors that the best way to plan in the future is to allow the Ag Element of the Comprehensive Plan to continue to direct these lands, and update them with guidance from the AAC if it is felt needed. This leads to my first detailed issue.

The plan does not address the fact, and staff continues to ignore the point that this is a large, rural area with a history of large wildfires. This needs to be studied in the EIR. Fuel loading and the lack of managing these fuel loads is a big issue that has been brought up by community members and the Santa Barbara County Fish and Game Commission. This will affect many areas of the plan. The health, safety, and welfare of the citizens, air quality, water amount and quality, bio-diversity, habitat improvement, and Ag operations are all affected. Staff suggestions are woefully lacking in this area, stating that another fire station and defensible space will mitigate it. Has staff talked to the county fire department, as they have a fuel management specialist and are the experts in this field? I hope you will address this important point before initiating the plan for the EIR.

I would like to recommend that you and the BOS consider Initiating the plan by minute order rather than as historically done, by resolution. Resolution would immediately throw all the inland portions of the plan into the much stricter coastal zone rules which would be very detrimental to the Ag operations along the coast. A minute order would allow each area of the plan to keep its rules until after the EIR and final adoption, and would also help prevent confusion to those applying for permits and having two sets of rules to try to figure out. If you feel there is a need for an immediate action on some issue, you as the Board of Supervisors could pass an emergency resolution to address that issue. That would seem to be the proper process to follow. Otherwise, it seems best to follow a process where we study the issue in the EIR and give the public proper time to review and comment on any proposed changes before implementation.

Please also consider Initiation by two resolutions, one for inland area and one for the coastal zone. This would restrict the coastal commission to reviewing only the coastal zone area, which would speed up the process and cost less money.

Again to emphasis, large wildfires are a natural element in our planning area. The plan ignores this. We need this studied in the EIR, and specifically, a fuel management (brush!) Plan. This relates to the health, welfare, and safety of the citizenry, air quality, water quality, habitat improvement, increased bio diversity, and Ag production.

ESH overlays are being expanded into the inland section of the plan area. This will stifle agriculture. Staff says Ag is exempt unless we need a permit. Well, what don't we need a permit for these days?! A weighted numbering system given to plants like the one used in other counties like San Diego, needs to be studied in the EIR as an alternative to the ESH overlay system which is too rigid and makes mitigation hard.

Please throw away the table of plants staff has listed as ESH habitat and alliances. These were given a rarity ranking somewhere, so staff is using that to place 100 foot buffers around them. Please note, these are not plants listed as endangered or threatened, nor are most of them rare in our planning area. I took a set of photos to the Planning Commission to show how this would prevent me from rebuilding a set of corrals on my family's ranch that my dad had built in the 1940s. These corrals are very important to our operation of a holistic, managed rotational grazing system, yet I would not be able to rebuild them under the proposed changes as these plants are everywhere!

The plan will not be balanced as stated in the Gav Pac goals unless the full list of incentives the community came up with and staff deleted, is put back in the plan, studied, and perhaps expanded in the EIR to be considered for implementation at the time of adoption of the plan when new restrictions will go into place. True incentives, like giving a bonus density for providing red legged frog habitat were never considered. Until we get a paradigm shift to real incentive based plans instead of punitive confrontational plans, the resources will continue to suffer.

The Gav Pac developed a list of small scale, compatible recreational activities that ranchers could try on a small scale basis without a permit to see if they would be profitable. Many other activities like the ones listed are being conducted on ranches today in Santa Barbara County. Gav Pac was never given time to fully develop the list, but wanted to include the other activities. The Amended ordinances section for the allowance of small scale, compatible activities with no major impacts, to be tried by owners to see if they are profitable and will help in the long term survival of family ranches, needs to add as advised by the AAC, "and other similar activities". Or at the start add, " including but not limited too" the small number of things staff listed. Otherwise staff will say, sorry, that activity is not mentioned and is therefore not allowed unless you get a major conditional use permit under the recreational section. This to me is the only good thing that came out of this whole planning process! I would like to request your help here to ask staff to include this for study in the EIR.

Paul Jensen from Environmental Health mislead the PC regarding the need for two leach fields on ALL septic systems, commenting, the state is going to require them. It is true that the state is requiring this, but for commercial buildings, not single family homes. I would like to request that the requirement for two leach fields for a single family home be deleted from the plan. This could still be required if studies done under the permitting process showed the two fields were needed if there is a problem area. There should not be a blanket requirement everywhere in the plan area, nor is there in any other community plans.

There is a county policy that requires one to be in compliance with all county policies. Staff needs to be sure that when they give an exemption to Ag in the Ag section of this plan for something like an Ag water tank is exempt from visual resources, that staff also addresses this in other sections of the plan and county policy. There is a current problem with an Ag water tank not being exempt from the general visual resource section of county policy. This issue needs to be clarified.

Regarding the need for more protection for steep slopes and using Gav Mountainous zoning to protect them, there is already enough protection in the county grading and brushing ordinances to address these concerns. I would like to request that Gav Mt. zoning not be used anywhere, including public lands, as this very restrictive zoning will prevent fuel and habitat management practices and could stop the forest service from issuing grazing permits and doing other fuel management practices. The consequences of this zoning need to be studied in the EIR.

Thank you for your consideration. My life long goal has been to preserve our family ranch and to be able to pass it along to the next generation as my father did for me and his father did for him! I would hope county policies would help me and other family farmers and ranchers to be able to achieve that goal. Bill Giorgi