

## Lenzi, Chelsea

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**From:** Andra Campbell <acampbell2@farmersagent.com>  
**Sent:** Friday, November 04, 2016 10:16 AM  
**To:** Board Letters  
**Cc:** Dave Campbell  
**Subject:** Gaviota Plan Letters  
**Attachments:** cattlemanletter1.pdf; cattlemanletter2.pdf

Please distribute the attached letter to all Supervisors and have it made part of the administrative record.  
Thank you,  
Dave Campbell

President,  
Santa Barbara County Cattlemen's Assn.

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# SANTA BARBARA COUNTY CATTLEMEN'S ASSOCIATION

Post Office Box 303, Los Alamos, CA 93440

*"WORKING TO SAVE RANCHING"*



November 3, 2016

Peter Adam, Chair  
Santa Barbara County Board of Supervisors  
105 East Anapamu Street  
Santa Barbara, California 93101

**Re: Gaviota Coast Plan**

Dear Chair Adam and Members of the Board of Supervisors,

The Santa Barbara County Cattlemen's Association (SBCCA) has followed and participated in the Gaviota Coast Plan process since its 2009 initiation. We appreciate the opportunity to comment on the Final EIR, the draft Ordinances and the proposed Gaviota Coast Plan (Plan). Our purpose in submitting this letter is to address the primary issues, associated with the documents proposed for your approval, that we believe will directly affect our ranching and farming activities.

Overall, we are concerned that the Plan, as proposed, eliminates the balance found in the existing County Local Coastal Plan and Comprehensive Plan, and implementing ordinances. Currently, the County's policies and ordinances strike a healthy balance among agricultural preservation and enhancement, natural resource protection and enhancement, and public access. The Plan's disproportionate emphasis on natural resource protection and expanding public recreation at the expense of preserving, protecting, and supporting agriculture. For example, most of the thirteen Class I environmental impacts which the Final EIR claims cannot be mitigated are the direct result of Policies, Action Items or Development Standards that would promote increased public trails across agricultural operations and through cultural resources and natural resources and would not mandate avoidance of these precious resources.

We do not agree that most of these Class I environmental impacts cannot be avoided or mitigated. The mitigation and avoidance can be accomplished by changing the trail routes included in the Plan. This is both feasible and reasonable. The impacts of increased public access could be substantially mitigated by incorporation Appendix C into the Plan, which are the full set of Trails Siting

Guidelines recommended by the subcommittee of the Gaviota Coast Planning Advisory Committee (GavPAC). The Trails Siting Guidelines sub-committee included members of GavPAC, CRAHTAC, the Trails Council and a State Parks representative and were submitted in time to allow for a thorough review and use as mitigation measures during the Draft EIR process. Instead, County staff rejected key provisions of the sub-committee's Trail Siting Guidelines that addressed avoidance of impacts on natural resources, visual impacts, agriculture and private property rights. County staff replaced sound mitigation measures with greater "flexibility for future trail siting efforts" which resulted in the thirteen Class I environmental impacts in the Final EIR.

We are disappointed in the Final EIR, which failed to correct most deficiencies noted in public comments from various private property owners and agricultural operators. We believe that the Final EIR is fatally defective and fails to meet the basic requirements of CEQA. Because others have articulated the inadequacies of this EIR, suffice it to say that we object to such an important Plan being adopted with such a defective EIR.

Your GavPAC envisioned and consistently advocated for a balanced Plan – a fair and reasonable compromise among community members who represented completely different perspectives, coming from agricultural and environmental backgrounds. In contrast, the proposed version of the Plan significantly expands the number of habitat types used to determine Environmentally Sensitive Habitat, contained in *Policy NS-4 ESH Criteria and Habitat Type*, sometimes to an absurd degree. For example, although the Plan characterizes these species as "rare and endangered" and explains in detail that the plants and habitat types included in the ESH designation were determined, in the absence of field observations in the Plan Area, upon the Natural Vegetation Classification System/Manual of California Vegetation, and the California Wildlife Habitats Relationships, it includes coast live oak woodlands, which are neither rare nor endangered on the Gaviota Coast or elsewhere in Santa Barbara County, and do not meet any of the ranking criteria for inclusion in the ESH for the Gaviota Plan. Including this species in the ESH listing casts doubt on the credibility of all of the listings. More to the point, there is no evidence whatsoever that all of the plants and plant alliances included either occur in the Plan Area or, if they do, qualify as "rare and endangered" or even threatened.

Why does this matter to our members? Because ESH fuel clearing and other biological disturbance restrictions included in the Plan impact our farming and ranching activities. Listing a species or alliance as ESH imposes unnecessary and inappropriate limitations on traditional vegetation clearance and grazing land improvements. The list in Appendix B to the Plan should be vetted so that it accurately reflects the actual ESH currently present in the Plan Area. Given the long history of land stewardship and management that is a tribute to the care that farmers and ranchers have taken to preserve and protect the environment (without which the Gaviota Coast would not enjoy the natural beauty that this Plan was intended to preserve) "rare and endangered" species currently existing in the Plan Area. Otherwise, the policies in this Plan are directly counter to the community's interest to produce a balanced Plan that supports agriculture and protects the environment.

Why else does this matter to our members? Because wildfire is one of the most significant threats to the viability of agricultural operations on the Gaviota Coast. Wildfire destroys forage and habitat and, without routine controlled burns and the farmer or rancher being able to thin and remove vegetation to eliminate heavy, dead fuel loads, it poses a very real threat to livestock fencing, agricultural structures, and ranchers' residences and those of their employees. Without controlled burns, it is impossible for owners of agricultural land to safely manage the risk of wildfire and keep their operations and improvements safe. As the National Park Service has only recently realized, occasional wildfires have a devastating impact that is felt for generations. Conducting periodic controlled burns and mechanically reducing the fuel loads in wildland and wildland interface areas is essential to reducing future devastating burns that kill everything in their path and scorch the earth and the seedbanks sheltered in it, resulting in severe erosion, increased sedimentation in creeks and impeding natural revegetation.

The Plan's expanded ESH criteria and their associated permit requirements and development standards will result in the significant curtailment of practical agricultural operations and expose the Plan Area to needless wildfire threats. We ask that the Board of Supervisors retain the existing protective resource regulations and not expand the ESH to include species such as the coast live oak, madrone forest, and white sage scrub. We also ask that the Board reject the use of habitat alliances to encompass both common and rare species, thereby casting an equal net over both.

The Gaviota Plan describes its support of farming and historical ranching operations. Our Association strongly believes that range improvements and fire reduction programs should be encouraged to enhance agricultural activity, soil conservation, water retention and public safety. In direct conflict with Policy AG-3.A, *Fire Hazard Reduction Program*, the proposal to expand the designation of ESH to include various **chaparral and sage scrub** species will severely curtail appropriate and beneficial range management activities. We ask that the activities described in AG-3.A be completely exempt from land use and coastal development permit requirements.

Additionally, in order to protect existing structures and agricultural investments throughout the Plan Area, we request that the Fire Department be allowed to determine an appropriate protective, defensible space distance for fuel modification. Based on other community plans, it is proposed by draft Ordinance that the maximum distance of defensible space is just 300 feet, but these other plans are not designed for so many thousands of acres of agricultural land. The Gaviota Plan Area is predominately zoned AG-II and does not include the type of inner-rural communities that are located in the Goleta or Toro Canyon areas. While those areas do have agriculture, it is not on the scale of the agriculture in the Plan Area. We feel that your Fire Department professionals should be authorized to make the determination of appropriate defensible space distances based on the conditions on the ground versus having this important matter decided by an arbitrary distance derived from a different community plan.

We strongly urge your Board to concur with the Planning Commission's decision to uphold the recommendation of your GavPAC to retain the AG-II Zoning on the private lands throughout the

Plan Area. We equally strongly urge you to reject calls to rezone privately-owned lands within the Plan Area to Mountainous Zoning. We agree with your Staff that the Mountainous Zone District is not an agricultural-based zone district that supports farming and ranching practices.

The GavPAC recognized this distinction, unanimously voted to retain the AG-II zoning for private lands, and in collaboration with the Natural Resource Conservation District and the Cachuma Resource Conservation District, adopted Steep Slope Guidelines, which provide enhanced erosion control measures for new agricultural operations on steep slopes. We support the Steep Slope Guidelines, but ask, as a point of clarification, that cattle grazing be specifically mentioned as an exempt activity with respect to falling outside the definition of "Development."

The Plan as proposed includes another significant obstacle to viable agriculture, incorporating a provision that is overly broad, expensive to comply with, and unjustifiable if the objective is to protect sensitive habitats that could be disturbed by a project. Specifically, proposed *ESHA Mapping Requirements* and Development Standards, *Dev Std NS-3: Rare Plants*, *Dev Std NS-4: Sensitive Wildlife Species*, *Dev Std NS-5: Wetlands* may require that, as part of an application for a discretionary land use permit in the Plan Area, the applicant submit surveys and mapping of the entire property, not just of the disturbance area around and within the proposed project site. These are not 1, 2 or 5 acre parcels where this approach might be appropriate. These are parcels that generally exceed 100 acres in size and the approach simply imposes an expensive and invasive burden that cannot be justified.

We also believe that it is unreasonable and warranted to include in the Plan, as proposed by County staff, a provision that would allow staff to pro-actively enter private property to map or survey our members' lands for sensitive species. We ask that this proposed program (Action Item NS-7) be deleted from this Plan.

We deeply appreciate the Plan's commitment to pursue exemptions or Categorical Exclusions for traditional agricultural activities in the Coastal Zone and ask that your Board adopt all policies, proposed in the Plan, that support and enhance the continued viability of agricultural operations to the extent the Board can implement those policies in the Inland Area pending their adoption in the Coastal Zone. Identifying activities that should be considered exempt from Coastal Development Permits was contemplated by your GavPAC as part of the Agricultural Permit Tier Program. We understand that it an Action Item is recommended to provide this benefit to farming and ranching operations on a County-wide basis. We support the development of Categorical Exclusions, but in the interim, the exempt agricultural activities that were in place prior to the Planning Commission's action on the Gaviota Plan remain in place both in the Inland Areas and Coastal Zone.

We respectfully request that you and your staff address the issue of precisely how current and future agricultural operations could be impacted if the proposed Plan and the implementing Ordinances are adopted. County staff has stated during this process that agriculture will continue to be exempt in both the Inland and Coastal Zone portions of the Plan Area. We would appreciate


clarification of these statements so that as an Association, we can report back to our membership and our neighbors who are concerned that the Plan will place severe limits on existing and future agricultural operations.

Finally, the importance of providing additional housing for family members cannot be over-emphasized. There is a provision in the Plan to offer a much needed Incentive Unit, but only if the landowner's property is located along an identified public trail segment. This limits the Incentive Unit's utility to a meaninglessly low level. We ask that the qualification for the additional unit be expanded to include the recording of an Agricultural Conservation Easement. This will not only help other generations stay on the ranch or farm but also insure the future permanent protection of our agricultural lands.

Our members' cattle grazing operations along the Gaviota Coast have been in place, raising food for the nation and preserving the natural environment for generations. As responsible stewards of the land with a long and successful history of conserving the land and preserving habitats, our members have demonstrated their understanding of and respect for the natural, visual, cultural, and historical resources in the area. These hard working folks intend to continue to farm and ranch and they ask that the County work equally hard to responsibly retain and support viable agricultural operations in the Plan Area.

We thank you for considering our requests and those of our members who live and work in the Gaviota Plan Area and are directly impacted by the implementation of this Plan.

Sincerely,



Dave Campbell, President

Santa Barbara County Cattlemen's Association

November 4, 2016

Peter Adam, Chair  
Santa Barbara County Board of Supervisors  
105 East Anapamu Street, Room 407  
Santa Barbara, CA 93101

Subject: Gaviota Coast Plan

Dear Chair Adam and Members of the Board of Supervisors,

I appreciate the opportunity to comment on the Gaviota Coast Plan (Plan). The Santa Barbara County Cattlemen's Association is concerned about language in the Plan that discourages safe and responsible energy production in Santa Barbara County. Specifically, we urge the Board of Supervisors to remove the language in Chapter Seven that reads "the use of enhanced oil and gas recovery techniques such as hydraulic fracturing and steam injection should be discouraged in the Gaviota Coast Plan Area".

The enhanced recovery techniques listed in the Plan are allowed under existing county policies, and in fact, just two years ago, Santa Barbara voters overwhelmingly rejected a ballot initiative that would have the same effect. Local energy producers have been safely and responsibly using these techniques for more than 50 years and have been doing so under the strictest environmental regulations in the nation. Further, an independent study of well stimulation treatments, as required by SB 4, which included the recovery techniques listed in the plan was conducted by the California Council on Science and Technology in conjunction with the Lawrence Berkeley National Laboratory. That study was released last year and found no significant direct environmental impacts from the long-standing use of these technologies.

I urge you and your fellow Supervisors to remove this language from the Plan so that local producers can continue to provide an affordable and reliable energy supply for businesses and working families.

Thank you,



Dave Campbell

President

Santa Barbara County Cattlemen's Association