

Katherine Douglas

Public Comment - California Farm Bureau # 1

From: Jules Tran <jtran@cfbf.com>
Sent: Tuesday, October 3, 2023 11:47 AM
To: sbcob
Cc: Karen Mills; Chris Scheuring
Subject: CAFB Comment Letter Submission for Brodiaea, Inc.
Attachments: 10.03.23 CAFB Comment Letter re Brodiaea.pdf

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Dear Clerk of the Board,

I am emailing you to submit a comment letter on behalf of the California Farm Bureau pertaining to the Brodiaea, Inc. matter.

The matter is scheduled for discussion at the County of Santa Barbara Board of Supervisors meeting on Tuesday, October 10, 2023.

Attached to this email, you will find the comment letter in question. I will also mail a copy of the comment letter.

California Farm Bureau has taken great care in preparing this document to provide valuable insights and perspectives on the matter at hand.

I kindly request that you acknowledge receipt of this email and the attached comment letter. Ensuring that our input reaches the members of the Santa Barbara Board of Supervisors is of utmost importance to us.

Should you have any questions or require further information, please do not hesitate to reach out to me. Thank you for your attention to this matter.

Sincerely,

Jules Tran
Paralegal & Secretary to Christian Scheuring

California Farm Bureau
Legal Services Division
2600 River Plaza Drive
Sacramento, CA 95833
(916) 561-5654

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Via Email
sbcob@countyofsb.org

October 3, 2023

BY U.S. MAIL & EMAIL

Honorable Das Williams, Chair
County of Santa Barbara Board of Supervisors
105 E. Anapamu Street, Suite 407
Santa Barbara, CA 93101

Re: Brodiaea, Inc. / North Fork Frost Ponds Project

Dear Chair Williams and Members of the Board:

The California Farm Bureau ("Farm Bureau") appreciates the opportunity to comment on the North Fork Ranch Frost Ponds Project (the "Project") and its associated environment review under the California Environmental Quality Act ("CEQA"), which we understand is to come before this Board at its October 10, 2023, meeting.

Farm Bureau is a non-governmental, non-profit, voluntary membership California corporation whose purpose is to protect and promote agricultural interests throughout the state of California and to find solutions to the problems of the farm, the farm home and the rural community. Farm Bureau is California's largest farm organization, comprised of 53 county Farm Bureaus currently representing nearly 29,000 agricultural, associate and collegiate members in 56 counties, including some 363 members of the Santa Barbara County Farm Bureau. The Farm Bureau strives to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of California's resources.

As we understand it, the County requires a discretionary permit for the construction of the ponds involved in the Project. We question whether the CEQA analysis of that construction should relate to downstream aspects of the eventual use of the ponds for frost protection – which will occur as a matter of right under the County's zoning for the property, and which otherwise occur under the framework of SGMA as a matter of groundwater management.

Santa Barbara Board of Supervisors
Brodiaea, Inc. / North Fork Frost Ponds Project
October 3, 2023

We are aware the relevant groundwater basin is managed by a groundwater sustainability agency under SGMA, the Cuyama Basin Groundwater Sustainability Agency, which has duly adopted a groundwater sustainability plan for the basin which has been substantially approved by the Department of Water Resources. This is the appropriate framework to address any groundwater concerns related to the project, as well as the process underway for an adjudication of the entire basin.

We urge the Board to confine its review of the project application to those aspects of the proposal which do not relate to groundwater use and management, and to overturn the Planning Commission's decision to the extent that it rests inappropriately on a desire to manage groundwater.

Very truly yours,

A handwritten signature in black ink, appearing to read 'CCS', with a long horizontal flourish extending to the right.

Christian C. Scheuring
Senior Counsel
California Farm Bureau

CCS/jt