Lenzi, Chelsea

From:	Steve Gliessman <gliess@ucsc.edu>
Sent:	Friday, February 1, 2019 11:03 AM
To:	sbcob
Cc:	Robbie Jaffe; Ana Citrin; Marc Chytilo
Subject:	Letter regarding Harvard's appeal of the Planning Commission's action to require a focused EIR for the North Fork Ranch Frost Ponds Project
Attachments:	GliessmanAddendum.doc; ATT00001.htm

Dear SB County Board of Supervisors Staff,

Attached please find a letter regarding Harvard's appeal of the Planning Commission's action to require a focused EIR for the North Fork Ranch Frost Ponds Project that will be reviewed at the Board of Supervisor's meeting on Feb. 5th.

Thank you for your attention.

Regards,

Steve Gliessman

UNIVERSITY OF CALIFORNIA, SANTA CRUZ

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ENVIRONMENTAL STUDIES DEPARTMENT

SANTA CRUZ, CALIFORNIA 95064

County Board of Supervisors
Santa Barbara County

Dear Honorable Board Members, 31 January 2019

As an addendum to my letter of September 2018 regarding the potential threatened nature of plants of critical concern in the area of the North Fork Ranch Frost Ponds Project, and the need for a focused EIR regarding the project, I make the following observations:

- The Cuyama Valley is known for spectacular wildflower displays when there is sufficient rainfall, and the 15.6 acres that would be developed for the reservoirs is potential habitat for a range of protected plant and animal species.
- Prior biological baseline studies were done during a prolonged drought when native plant species were not visible. Valuable species and habitats could be lost if the 15.6 acre development proceeds without a focused EIR.
- The long history of disturbance by grazing, contrary to the claim by the Project proponents that it would eliminate plants of concern, actually enhances their presence. Extensive research by conservation biologists and rangeland managers shows that removal of the non-native grasses by grazing allows the presence of native species[1].
- The claim by the Project proponents that 2016 was an average rainfall year also is problematic. Despite totals near average for that year, close examination of the distribution of the rainfall tells another story. Almost all of the rain in that season fell during January or earlier, with very limited rainfall and abnormally warm temperatures from February through May creating drought conditions and severely limiting native plant species establishment[2].
- Recent concern has been raised by a survey completed by The Nature Conservancy that identified possible groundwater dependent ecosystems (called GDEs) in stream and river courses in and around the vineyard project[3]. Filling the reservoirs with groundwater could potentially damage these ecosystems by lowering the water table they depend upon. A focused EIR should also address these systems.

- The 2019 spring is shaping up to be ideal for native plant species establishment, especially of many of the annual wildflower species of concern I listed in my September letter; and offer ideal conditions for an adequate focused EIR.

I am asking the Board of Supervisors to support the decision of its Planning Commission to require a focused EIR to determine if the reservoir project should move forward or not, or if there are adequate mitigation measures to allow it to do so.

Sincerely,

Dr. Stephen R. Gliessman

Professor Emeritus of Agroecology and Natural History

Department of Environmental Studies

University of California, Santa Cruz

[1] Barry, S., Larson, R., Nader, G., Doran, M., Guenther, K., Hayes, G. 2011. Understanding Livestock Grazing Impacts: Strategies for the California Annual Grassland and Oak Woodland Vegetation Series. University of California, Division of Agriculture and Natural Resources, Publication 21626.

Bartolome, J.W., Allen-Diaz, B.H., Barry, S., Ford, L.D., Hammon, M., Hopkinson, P., Ratcliff, F., Spiegal, S., and White, M.D. 2014. Grazing for Biodiversity in Californian Mediterranean Grasslands. *Rangelands* 36: 36-43.

Kimball, S., and Schiffman. 2003. Differing Effects of Cattle Grazing on Native and Alien Plants. *Conservation Biology* 17: 1681-1693.

[2] Visit: www.countyofsb.org/pwd/rainhistory.sbc

[3] Visit: htps://groundwatesrresourcehub.org. Understanding and Managing Groundwater Dependent Ecosystems.