

1



Katherine Douglas *Public Comment - Group 2*

From: Anabel Ford <ford@ucsb.edu>
Sent: Friday, October 6, 2023 8:54 AM
To: sbcob
Cc: Robbie Jaffe
Subject: Fwd: North Fork Vineyard Reservoirs appeal

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

We have sent this to our representatives and want this to be included for hte 10 October session.

Anabel and Mike

----- Forwarded message -----

From: Anabel Ford <ford@ucsb.edu>
Date: Thu, Oct 5, 2023 at 1:02 PM
Subject: North Fork Vineyard Reservoirs appeal
To: <bob.nelson@countyofsb.org>, <SupervisorWilliams@countyofsb.org>
Cc: Michael Glassow <glassow@anth.ucsb.edu>

TO: Santa Barbara County Supervisors
FR: Anabel Ford and Michael Glassow
727 E Anapamu

We are writing about the North Fork Vineyard Reservoirs appeal which will be on the Board agenda on October 10th.

We support the Planning Commission's decision to **deny** these permits and oppose the appeal.

Water is life in our world, in California, and for Cuyama. We have taken this vital resource for granted and must be much more prudent in our use. The small, rural community of Cuyama in northeastern Santa Barbara County is completely dependent on groundwater for all individual and agricultural uses. There is no other source of water for drinking, for homes, for schools, for farms. The Cuyama Valley is one of 21 **critically over drafted basins** in California. For too long too much water has been pumped out of the ground, exceeding that with nature can recharge.

The State of California mandates that the basin must be brought into sustainability by 2040. Clearly this precludes drawing out more water than can be replenished by rainfall. We must reduce the pumping in Cuyama Valley by 60% now to get on track to meet the 2040 threshold. Yet a new neighbor in Cuyama— Harvard University’s investment arm— has converted non-irrigated rangeland into 850 acres of water-intensive vineyard. This investment by Harvard University’s endowment fund is depleting Cuyama Valley groundwater at a serious rate and not respecting the mandated sustainability goals. This is threatening the way of life in the area. Now Harvard University’s investment arm wants to pump even more and this **MUST BE STOPPED**.

Cuyama has always been an agricultural community emphasizing small-scale sustainable farming. Most of the farmers in the area are generational farmers and ranchers who have been acting as stewards of the land. They

have been adapting to cope with climate chaos including recent droughts, switching to less water-intensive crops, and making cutbacks to water pumping.

Now, they are defending our Santa Barbara County water resources.

In the Cuyama Valley, there has been a critical over draft impacting the groundwater basin. The latest corporate newcomer is threatens community conservation efforts. We urge you to join us and stop Harvard Management Corporation's water grab in Cuyama.

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Dr. Anabel Ford  
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Exploring Solutions Past ~ The Maya Forest Alliance  
and Director  
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Katherine Douglas

From: Lillian Clary <mzlil2988@gmail.com>
Sent: Friday, October 6, 2023 9:51 AM
To: sbcob
Cc: Lil Clary
Subject: North Fork Frost Ponds

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Please share this comment with Supervisors and include in Public Comment for the meeting of October 10. Thank you.

Just because you can does not mean you should.

In this instance, just because the Harvard Endowment purchased land and planted grapes does not mean that the operation should be allowed to develop frost ponds.

We have been visiting the Cuyama Valley since 1980. We have ridden and camped with our mules in the Calientes, off Highway 33, Miranda Pine/Sierra Madre ridge and in the portion of the Los Padres National Forest south of Cuyama. We frequently visit friends who live on an historic ranch just off Cottonwood Canyon Road.

The section of land adjacent to Highway 166 and Cottonwood Canyon has traditionally been used for cattle grazing. Some years there hasn't been enough rainfall to support this use. It is clear that the minimal rainfall is not sufficient to regenerate the water table.

Why any entity would think that grapes would be a viable crop is a mystery to us. Certainly there's nothing special about the terroir. The grapes aren't estate bottled...you can't go to a local wine shop and get "Harvard". How can this vineyard make money? Even the cannabis growers have discovered that it is not economical to continue operating.

In closing, we ask that the Board deny the North Fork appeal. The water overdraft throughout the Cuyama Valley is already critical. Don't make it worse.

David and Lil Clary

Message delivered to you via mule

Katherine Douglas

From: Ella Boyajian <ellaboyajian@gmail.com>
Sent: Friday, October 6, 2023 11:42 AM
To: sbcob
Subject: Letter Opposing the Construction of North Fork's Reservoirs
Attachments: October 6, 2023 Hearing Item #1 Letter.pdf

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Members of the Santa Barbara County Board of Supervisors,

I am writing on behalf of our resilient community in Cuyama; a small, rural enclave located in northeastern Santa Barbara County. I humbly request your support in opposing the proposed construction of North Fork's reservoirs in our county.

Our community in Cuyama has always been rooted in agriculture. Many of us are generational farmers and ranchers and as locals living and working in the Valley, we have been committed stewards of our land because we wish to see our way of life sustained. Over the years, we have adapted to drought conditions by switching to less water-intensive crops and reducing water pumping. However, the challenges we face have become even more daunting with the arrival of Harvard University's investment - North Fork - which has transformed non-irrigated rangeland into an 850-acre water-intensive vineyard; further depleting our already overstressed groundwater resources. North Fork's attempt to expand their water extraction poses a significant threat to our community.

Water, often referred to as "the new oil", has become a global commodity coveted by private corporations seeking to secure control over this precious resource. The world has witnessed how private entities are purchasing land and aggressively asserting water rights across the globe. This trend is not merely an observation; it is a well-documented reality that has raised alarm bells regarding the future of water access and availability for ordinary citizens.

In the heart of California, a state already grappling with water scarcity issues, the situation has become even more ominous. Our isolated community has found itself in an exhaustive water rights adjudication filed against Cuyamans by the world's largest carrot growers. In a water war likened to David versus Goliath, every Cuyaman rancher, small-scale farmer, business - even our schools - has been sued for water rights by Grimmway Farms and Bolthouse Farms. In 2021, it was a shock to our community that Grimmway and Bolthouse filed for adjudication after six years and thousands of dollars were spent participating in a public process that resulted in the development of a State approved 1600 page Groundwater Sustainability Plan (that Grimmway and Bolthouse twice voted in favor of). But greed knows no end and because this legal avenue of adjudication existed for them, they decided to relentlessly pursue their self interest, despite the financial and environmental impact on our low-income community.

Similarly, North Fork is also relentlessly pursuing a legal path available to them to try and force what they want. The timing of this new water grab by yet another massive corporation within our community is highly suspicious. We cannot ignore the fact that this corporation's actions coincide with our ongoing water conflict with two additional corporate behemoths. North Fork's aggressive pursuit of our water resources threatens to exacerbate the challenges we already face, pushing us to the brink of an unsustainable future.

The State of California has mandated that we bring our groundwater basin into sustainability by 2040. This means we must cease pumping more water than nature provides. We face the daunting task of reducing our water extraction by 60%. This challenge is exacerbated by the corporate giants that have invaded our Valley

and contribute significantly to the depletion of our groundwater basin, jeopardizing our way of life. However, Cuyamans are committed to fighting for the sustainability of our basin.

Cuyamans have launched a carrot boycott against the first two corporations that threaten us and our story has made national news. Last week the Associated Press released an article that was picked up by several news outlets including ABC News and Yahoo News. This week, the New York Times is once again visiting our Valley. Yes, the world has eyes on Cuyama - on Santa Barbara County - as we are a microcosm of the water wars happening across America. Cuyama has become the face of our national groundwater crisis. We have been so grateful to Supervisor Williams for his unwavering public support of our boycott. Cuyamans often feel forgotten and unheard, yet Supervisor Williams' steadfast support has undeniably been a beacon of hope, serving as constant reminder that we are an integral part of the Santa Barbara County community.

It is a hope we have felt each time the Santa Barbara Board of Supervisors has stood with us against North Fork's request to build these reservoirs. Three times now, the Cuyama community has united in opposition to the construction of these reservoirs, and three times Santa Barbara County has acknowledged our concerns and denied North Fork these permits. However, North Fork persists in their argument that the reservoirs are necessary for frost protection, despite their successful use of wind turbines for this purpose. Now, North Fork has marshaled their consultants and legal team to appeal this decision yet again.

As North Fork seeks to expand their water extraction, we urgently ask for your help in preventing these reservoirs from being built. We appeal to the Board of Supervisors to intervene on behalf of our community and take decisive action to stop this water grab. Our rural way of life, our agricultural heritage, and our very survival depend on fair and equitable distribution of water resources. The unchecked actions of corporate entities must not be allowed to undermine the well-being and future prosperity of our community. We implore you to prioritize the interests of the local community over corporate interests. We believe in responsible, sustainable water use that benefits everyone, not just a select few.

In closing, we respectfully request that the Board of Supervisors take swift and decisive action to protect our water rights, our community, and our shared future. We urge you to stand with us against this water grab and to use your authority to ensure that water remains a public good, accessible to all residents, and not subject to the control of massive corporations.

With hope for the future of our Cuyama Valley,
Ella Boyajian

October 6, 2023

Dear Members of the Santa Barbara County Board of Supervisors,

I am writing on behalf of our resilient community in Cuyama; a small, rural enclave located in northeastern Santa Barbara County. I humbly request your support in opposing the proposed construction of North Fork's reservoirs in our county.

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Cuyamans have launched a carrot boycott against the first two corporations that threaten us and our story has made national news. Last week the Associated Press released an article that was picked up by several news outlets including ABC News and Yahoo News. This week, the New York Times is once again visiting our Valley. Yes, the world has eyes on Cuyama - on Santa Barbara County - as we are a microcosm of the water wars happening across America. Cuyama has become the face of our national groundwater crisis. We have been so grateful to Supervisor Williams for his unwavering public support of our boycott. Cuyamans often feel forgotten and unheard, yet Supervisor Williams' steadfast support has undeniably been a beacon of hope, serving as constant reminder that we are an integral part of the Santa Barbara County community.

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With hope for the future of our Cuyama Valley,
Ella Boyajian

Katherine Douglas

From: Liz Carlisle <liz.carlisle@gmail.com>
Sent: Friday, October 6, 2023 2:18 PM
To: sbcob
Subject: Comment: Oct 10 meeting re: proposed reservoirs at Harvard's North Fork Vineyard

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Board of Supervisors,

Thank you for the opportunity to comment!

My name is Liz Carlisle. I am a Goleta resident, and I teach at UCSB. Agricultural sustainability is the focus of my research, and I have taken students on several field trips to the Cuyama Valley. The focus of my comment is my deep concern over the reservoirs proposed at Harvard's North Fork Vineyard.

As you know, the western end of the Cuyama Basin has historically been managed as rangeland with very minimal irrigation. The water table in the area of the vineyard is already decreasing after just seven years of irrigation.

The proposed reservoirs would be filled with groundwater, impacting everyone downstream, as well as the natural ecosystem and the viability of agriculture in the Cuyama Valley.

Although there are reservoirs in the Cuyama Basin, none are anywhere near as large as the reservoirs proposed by the Vineyard.

I strongly urge you to deny this permit.

Sincerely,
Liz Carlisle

Katherine Douglas

From: Robbie Jaffe <robbiejaffe@gmail.com>
Sent: Friday, October 6, 2023 12:01 PM
To: sbcob
Subject: Letter for 10-10 meeting agenda 1
Attachments: Jaffe-Gliessman. 10-10 Agenda 1 letter.pdf

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Please accept the following letter for submission.

Thank you,
Roberta Jaffe

October 6, 2023

Santa Barbara County Board of Supervisors
105 E. Anapamu Street
Santa Barbara, CA 93101

By email

Dear Chair Williams and Fellow Supervisors:

For 25 years, we have been dry farming winegrapes and olives in the western end of the arid Cuyama Valley to produce wine and olive oil. All of the farmers and ranchers in the Valley, rely solely on the availability of groundwater to sustain our livelihoods. The Cuyama Groundwater Basin, which is identified by the CA Department of Water Resources (DWR) as being “critically overdrafted” has developed an important groundwater basin management plan according to California’s 2014 groundwater law (Sustainable Groundwater Management Act or SGMA). SGMA requires local governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge.¹ While we respect the rights of farmers to grow crops in their selected production systems, we also see the need to recognize the limits of our groundwater and the impacts of the overdraft on farming and the environment. We are concerned that by the time SGMA is fully implemented in the Cuyama Valley (2040) the Project’s reservoirs will have already been constructed and in use, impacting the residential farmers and ranchers, the native plants and habitats and further depleting an already severely overdrafted groundwater basin.

The Cuyama Basin is the only high priority, critically overdrafted basin in Santa Barbara County. We are one of 21 critically overdrafted basins identified by the State of California, and of these, we are only one of two basins that is completely dependent on groundwater. Our drinking water, our homes, our schools, our farms, our ranches and our natural habitat only have groundwater to depend on. As our Supervisors, we need you to carefully consider the decision you will be making on the proposed reservoirs in this context. Because of this situation, it is important for the future of the Cuyama Valley that the County’s Land Use Planning policies work in conjunction with the Cuyama’s Groundwater Sustainability Plan to bring the groundwater to sustainability. Because of this we strongly support the Santa Barbara County’s Planning Commission’s denial of the reservoir permit on May 10, 2023 along with the staff findings.

As residents of the Cuyama Valley, we want you to know:

- That we are very involved in the development and current implementation of the Groundwater Sustainability Plan (GSP) for the critically overdrafted Cuyama Basin and therefore are aware of what the Cuyama Basin is facing in needing to decrease our overall groundwater extraction (Our specific credentials and expertise are listed at the end of this letter);

¹ <https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management>

- That we are farmers and we support the right to farm as long as it is done in a way that does not have negative impacts on the environment and surrounding communities.
- That we believe that the project to construct three large reservoirs will have a negative impact on the Cuyama Basin, especially the neighbors in the canyons to the south and the ranches to the west along the Cuyama River and further downstream.
- These reservoirs are not needed for frost protection since a combination of pumping directly from their existing wells into the already existing sprinkler system, along with alternatives such as wind turbines are already in use and can be further developed. This would eliminate the need to construct the reservoirs as well as lower the increased extraction of groundwater.
- By the time SGMA is fully implemented, Brodiaea, Inc., if this Project is implemented, will have already expanded the damaging overextraction of groundwater, creating negative impacts on native plants and animals, and impact the groundwater availability of nearby neighbors.

Therefore, we support findings for denial of the project.

We fully support the staff letter to the Board of Supervisors responding to the appellant's points of appeal. With a focus on our scarcity of groundwater, we want to highlight staff's response to the following issues:

- **Appeal Issue No.1: Conditional use Permit Finding No.1**

"Therefore, the Planning Commission's finding that the Project's location and physical characteristics (i.e., exiting groundwater conditions) are not adequate to accommodate the Project's water use necessary to provide frost protection for 840 acres of vineyards is supported by substantial evidence in the record."

The minimal recharge and downward trend of groundwater levels seen in hydrographs in the GSA monitoring system point out the growing lack of water availability.

- **Appeal Issue No.3: Conditional use Permit Finding No.3**

"The Planning Commission was unable to make the finding that adequate public services exist to serve the Project. The EIR concluded that the Project's evaporative water loss could be reduced to below the County's adopted threshold of significance for the Cuyama Groundwater Basin (31 AFY).

However, the Planning Commission found the Project's long-term water demand (up to 103 AFY) would be supplied from a critically overdrafted groundwater basin, which would have the potential to adversely affect the Project area. Therefore, adequate water supply resources are not available to serve the Project....the Planning Commission's finding that water supplies are not adequate to serve the Project are based on a determination that the Project's long-term water demand will contribute to declining groundwater levels in the project area, and is supported by substantial evidence in the record that shows recent declines in groundwater levels at the project site."

The same overdraft and lack of adequate recharge noted above apply to this issue as well.

- **Appeal Issue No. 4: Conditional Use Permit Finding No. 5**

"The Planning Commission found that the proposed Project's water use will contribute to existing declines in groundwater levels, resulting in a long-term water supply impact that

will detrimentally affect the general welfare of the Project area. As described in the response to Appeal Issue Nos. 1 and 3 above, a limited data set of shallow wells indicates that levels have historically remained fairly stable throughout the Northwest Threshold Region and remain stable in the western portion of the region. However, deep wells in the eastern portion of the region (i.e., in the vicinity of the proposed project site) have experienced continued decline, with water levels dropping 40 feet on average since pumping began at the project site vineyard in 2016. Based on this information, groundwater conditions in the vicinity of the project site are not “fairly stable” and concerns expressed by the public and the Planning Commission regarding declining groundwater levels in the Project area are supported by information in the Project’s administrative record, such as the water well hydrographs shown on Figure 1 of the Planning Commission staff report dated March 15, 2023 (Attachment 4).”

This is further evidence that the availability of groundwater in the Project area is inadequate to supply the water the reservoirs will require, especially in severe frost years when they will need to be refilled multiple times.

• **Appeal Issue No. 5: Conditional Use Permit Finding No. 6**

The Planning Commission found that the Project does not comply with the following Comprehensive Plan policies:

“Land Use Development Policy No. 4 requires that adequate public or private services and resources (e.g., water) are available to the proposed development. The Planning Commission found the Project’s use of water was inconsistent with this policy because the amount of groundwater removed from the aquifer each year by the Project (up to 103 AFY) would be produced from the Cuyama Valley Groundwater Basin,...

Agricultural Element Policy 1B.... The Planning Commission found that the Project’s use of groundwater produced from the critically overdrafted Cuyama Groundwater Basin could potentially impact the long-term viability of agriculture in the region. Therefore, the Project would be inconsistent with the requirements of this Policy.”

DWR’s Concern for the Northwestern Region of the Cuyama Basin

In the California Department of Water Resources (DWR) two reviews of the Cuyama Basin Groundwater Sustainability Plan (GSP), they specifically identified concerns about the northwest region which is the location of the North Fork Vineyard.

(1) In their review of January 2022, in which they found the GSP incomplete, their corrective actions included:

“B. Additionally, an area of the basin that was not identified as a management area (the Northwestern threshold region) was, nonetheless, projected to experience more than 140 feet of groundwater level decline, relative to 2015, during implementation of the GSP. The GSP did not describe how the apparently allowable overdraft in this region would affect beneficial uses and users of groundwater and avoid undesirable results.” p.2 of letter to Cuyama GSA dated January 21,2022)

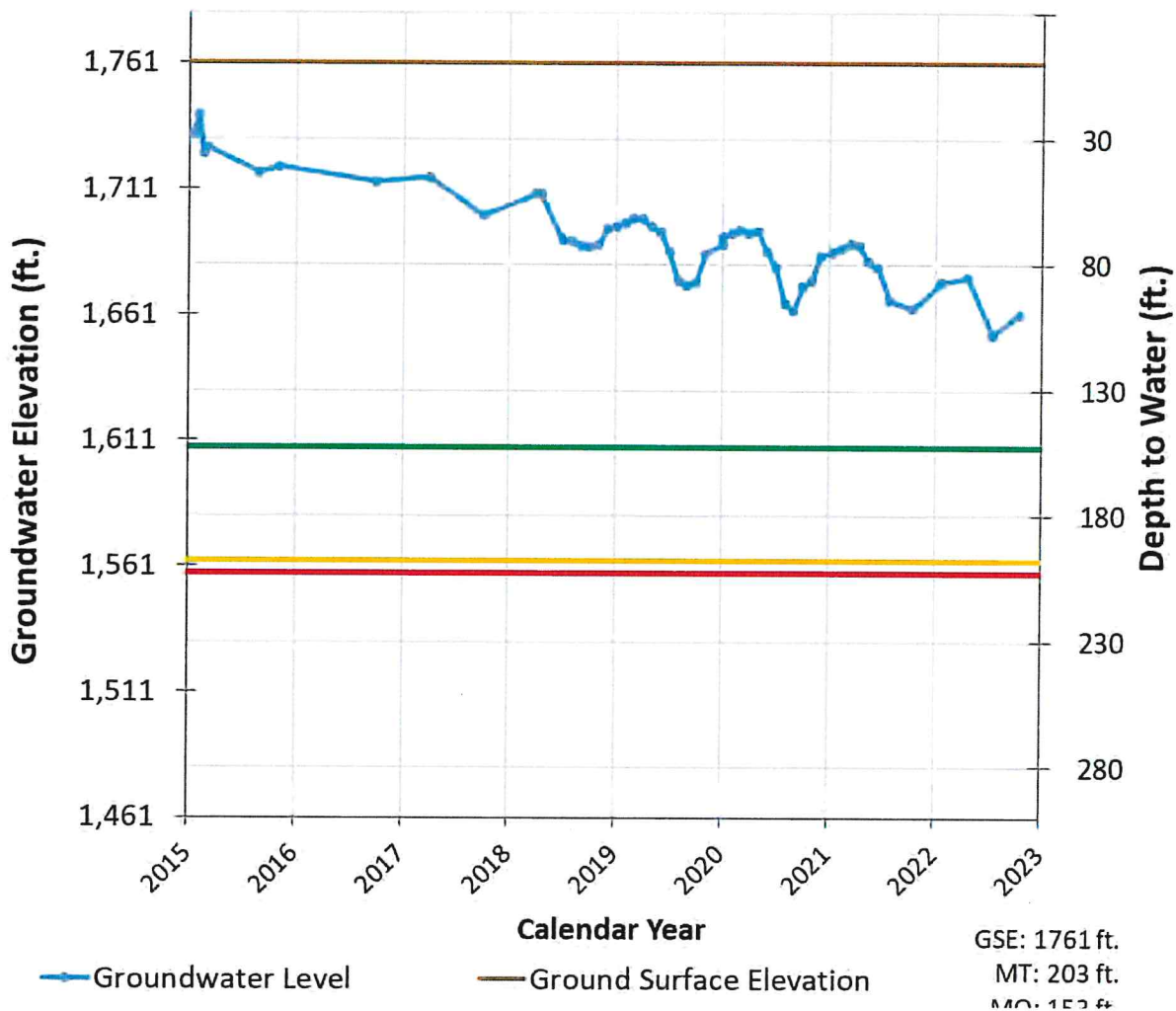
(2) In the DWR’s letter of approval of the GSP in May 2023, they highlight the northwest region again as the first of five recommended corrective actions.

1. “Clarifying the rationale and methods of simulating impacts to beneficial uses and users in the Northwestern Region.” (in letter to Cuyama GSA dated May 25, 2023).

These concerns expressed by DWR still need to be addressed by the Cuyama GSA. Strong support for protecting the western end of the Cuyama Basin, through denial of the proposed reservoirs, is needed from the Supervisors in order to protect the western region from further depletion and to align land use planning for this region with the overall goals of the GSP.

Our concerns are further supported by the monitoring taking place through the GSP. The 2023 Annual Report was prepared by the GSA consultants for submission to the DWR. It shows the state of the groundwater basin in the Cuyama Valley. The hydrograph below is from Well 841 which is one of North Fork Vineyard’s wells and is part of the GSP monitoring network. It shows that since the beginning of pumping in 2015 when the vineyard was planted, the groundwater level in the well has decreased from surface level to 100 feet below ground level and is on a steady downward trend. The construction and filling of the proposed reservoirs with groundwater will only increase the downward slope of the groundwater level which will impact the entire western portion of the Cuyama Basin.

841 Hydrograph



Finally, the Environmental Impact Report prepared and presented to the Planning Commission in March 2023 at the request of the Board of Supervisors, clearly shows in every scenario evaporative loss alone from the sprinkler system will exceed the 31AF threshold of Santa Barbara County, thus further threatening our critically overdrafted

basin. In addition, the EIR takes into consideration the Cuyama Basin's Groundwater Sustainability Plan (GSP). This is a step toward collaboration between the County and SGMA as together we plan for the future sustainability of the region and support no further threatening of the groundwater supply. We appreciate all of the effort that has been put into this study.

The EIR provides rationale for this project being denied. The mitigations needed to keep the evaporative loss under 31 AF are such that the reservoirs will not meet the frost protection needs in normal and heavy frost years (Table 6.1) Thus, the project would not meet its objective and in the meantime over 15 acres of natural habitat will be destroyed, and the Cuyama Basin's groundwater level will further be depleted.

Any further extraction of groundwater at this time is unwarranted. Despite the claims put forward by Brodiaea, Inc., not only will they exceed that County threshold of 31 acre feet during most frost events with solely the use of sprinklers from the frost ponds, they will also contribute significantly to the continued downward slope of groundwater levels in the northwest region of the basin.

In summary, the western part of the Cuyama Basin has traditionally been dry rangeland and unlike the eastern portion, has not yet reached critical threshold levels for groundwater in the region of the vineyard. But a dramatic drop in groundwater levels has been monitored in just the first 6 years after installing over 15 deep agricultural wells and pumping groundwater, Water levels have dropped as much as 100 feet and show a disturbing downward trend that will not stop with the current level of overdraft. With the installation of reservoirs with the capacity of 147 acre-feet of water and its significant evaporation, the project can cause impacts on native habitat, groundwater levels, and neighboring wells and eventually deplete groundwater in the western end of the Cuyama Valley. We ask that the Board of Supervisors deny the North Fork Vineyard Frost Pond Project and approve the staff findings for denial.

Thank you for your consideration.

Sincerely,



Stephen Gliessman and Roberta Jaffe
Farmers and Residents
Cottonwood Canyon
Cuyama Valley

Our Credentials and Expertise

Stephen R. Gliessman and Roberta M. Jaffe have extensive careers in sustainable agriculture as both educators and practitioners. For 25 years we have been organically dry farming grapevines and olive trees in the western Cuyama Valley. We have worked with nonprofit and farmer organizations in rural communities internationally and in

California to support sustainable food systems that support the local economy. Ms. Jaffe has served on the Standing Advisory Committee for the Cuyama Basin Groundwater Sustainability Agency since its inception and was the first Chair. Dr. Gliessman is a professor emeritus in Agroecology and Environmental Studies from the University of California Santa Cruz. Both are members of the Cuyama Valley Community Association.