

# 3



Katherine Douglas

Public Comment

**From:** Eric Cárdenas <ecardenas@sbbotanicgarden.org>  
**Sent:** Friday, August 22, 2025 2:44 PM  
**To:** sbcob  
**Subject:** Open Space Element Update (agenda item 3) comment letter  
**Attachments:** OSE Comments SBBG.pdf

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To: Santa Barbara County Clerk of the Board

Please accept the following comments from Santa Barbara Botanic Garden in regards to next Tuesday's agenda item #3, Planning and Development Department's Open Space Element Update Project Scoping.

Kindly confirm receipt and distribution of these comments to members of the Board of Supervisors.

Thank you,



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**Eric Cárdenas (he/him)**

*Director of Impact and Advocacy*

1212 Mission Canyon Rd.  
Santa Barbara, CA 93105  
805.682.4726 x657



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August 21, 2025

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

**Re: Santa Barbara Botanic Garden Comments on Open Space Element update**

Chairwoman Capps and Members of the Board,

Santa Barbara Botanic Garden respectfully submits the following comments regarding the County's proposed updates to the Open Space Element (OSE), as required by SB 1425. As an organization committed to regenerating ecosystem health, growing the native plant movement, and building a legacy of stewardship to benefit future generations, the Garden believes that updating the OSE provides a prime opportunity to ensure that open spaces within the County of Santa Barbara are vehicles for conservation and thriving biodiversity. Thank you for engaging in this update effort.

One of the Garden's three pillars – growing the native plant movement – is intentionally geared towards achieving 30% native plant cover where we live, work, and play. As you may know, native species support biodiverse and well-functioning ecosystems in ways that non-native plants simply cannot and are essential for human health and well-being. They improve our resilience against climate change impacts like excessive heat, drought, floods and wildfires, serve as wildfire buffers, and provide a range of other benefits including adding aesthetic, cultural, and spiritual value. When properly installed and maintained, California native plants are low-water and require no chemical fertilizers or pesticides. Our 30% target is important, as numerous scientific studies have found that environments with less than 30% native plant cover see a reduction in overall biodiversity—less insects, butterflies, and bees, and thus, less birds and other larger organisms. This impacts the food chain and health of entire ecosystems, and with the loss of pollinators, even our own agricultural and food systems.

**As a key anchor point to the comments that follow, we believe that updating the OSE (or Conservation Element) with enforceable policy language that requires a minimum of 30% native plants for certain projects (rewilding, restoration, redevelopment, etc.) would help advance the Garden's – and our community's – biodiversity goals.**

We appreciate your staff's work in bringing you the three options presented in the staff report. After our review and consultation with some of the Garden's key conservation stakeholders, we would like to express a few observations as follows:

- The Open Space Element is nearly 50 years out of date, in which time conditions in our natural environment and human communities have drastically changed. With this in mind, a more comprehensive update to the OSE is merited, and not just one that accomplishes the bare minimum of updating the OSE per state mandates to address equitable access to open space, climate resilience, and rewilding opportunities.
- As noted by your staff, there is some overlap between the OSE and the Conservation Elements (CE), both which require updates per state legislation. The staff supported *moderate* option



## Santa Barbara Botanic Garden

(option 2) begins to address this overlap, but as indicated in the staff report, does so only partially per AB 1889 requirements. Again, a more comprehensive/holistic approach would be beneficial.

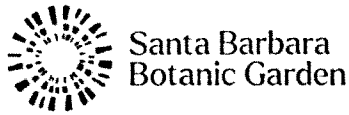
- The ‘rewilding’ mandates, among others, provide key opportunities for the development of enforceable, policy-oriented language in the updating of these elements to truly protect habitat, conserve and restore biodiversity, and support native plants as a key tool in conservation practices.
- For any option other than option 1 (*low*), we recognize that additional resources have not been budgeted, and that additional work is not part of current long range development work plans.
- It is our understanding that there is no penalty for not meeting the state-imposed deadline of January 2026. As such, delaying the OSE update may be a worthwhile strategy in order to build up necessary resources.

### Recommendations

It is our belief that the update process for the OSE, the CE, and even possibly other elements within the County’s Comprehensive Plan, could benefit by being reviewed and updated holistically. Just as with ecosystem dynamics, systems work better as an intact, cohesive unit and suffer when broken apart or piecemealed. We believe that the outcome of a comprehensive approach would yield better results that truly work to conserve our natural resources. As such, Santa Barbara Botanic Garden recommends the following approach:

- **Adopt staff recommendation 3 (*high option*).** If necessary, delay the current update process in order to identify a new, more comprehensive update strategy. Identify and/or pool resources to update both elements concurrently while likely making the process more efficient and economically viable.
- Work a more comprehensive update into **FY 2026/2027 county staff work plans**, allowing for appropriate budgeting of human capital and financial resources.
- Regardless of the direction of the Board on selecting between existing options or moving in a new direction all together, the Garden feels that **enforceable policy language** in either the OSE or the CE should be added that uplifts and upholds a minimum of 30% native plant cover as a **necessary** requirement in rewilding or other conservation related activities. **Per the staff report:**
  - For the purposes of this section, “rewilding opportunities” may include but are not limited to the following:
    - *Opportunities to preserve, enhance, and expand an integrated networks of open space to support beneficial uses such as habitat, recreation, natural resources, historic and tribal resources, water management, and aesthetics.*
    - Establishing natural communities conservation plan to provide for coordinated mitigation of the impacts of new development.

Native plants serve as a key tool in many of the opportunities presented above, and developing language that requires native plants in certain situations is a direct way to protect and restore ecosystem health.



In this time of global biodiversity loss, the Garden believes it is imperative that we act locally to protect, preserve, and enhance open space and natural resources, regenerating these wherever possible. This Open Space Element update process provides County leadership and the community at large a great chance to look at and activate around ecosystem health through a broad lens, using important planning process tools to protect and promote biodiversity.

Again, an approach that directly and cleanly ties open space to conservation as part of the County's Comprehensive plan is the best way to address core ecosystem needs countywide. We recommend the adoption of option 3 for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Cárdenas". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

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Eric Cárdenas, Director,  
Impact and Advocacy,  
Santa Barbara Botanic Garden