



HOLLISTER RANCH COOPERATIVE, Hollister Ranch #70, Gaviota, California 93117 (805) 567-5099

Honorable Das Williams  
Santa Barbara County Board of Supervisors  
c/o Clerk of the Board  
105 East Anapamu Street, Fourth Floor  
Santa Barbara, CA 93101

July 11, 2018

**Re: Response to CCC Staff Modifications to the Gaviota Coast Plan.**

Dear Chair Williams and Honorable Members of the Board:

Thank you for the opportunity to comment on the California Coastal Commission staff's proposed modifications to the Gaviota Plan which was originally prepared by the GavPAC and County staff with input from members of the community. The Hollister Ranch Cooperative, which oversees the historical cattle operation on the 14,500 acre Hollister Ranch, supports the County's objections to the CCC's staffs proposed modifications to the Gaviota Plan, and we request your consideration of the following.

Many ranchers and farmers on the Gaviota Coast have historically employed low impact agricultural practices that avoid or encourage environmentally sensitive habitat (ESH). The success of this approach is evidenced by the Gaviota Coast being acknowledged by experts as one of the top 15 most biodiverse hot spots in the world. Increasingly Gaviota farmers and ranchers are employing holistic agricultural methods, such as permaculture and regenerative grazing practices, which can protect and promote ESH.

Regenerative grazing, which the Hollister Ranch Cooperative is implementing, tries to replicate the grazing style of the original grazers on the land, herds that grazed the land and then moved on. This method of more intensive, rotational grazing encourages native grasses over imported European grasses and invasive plants, and to allows native plants, such as oak trees, to survive as grazers move on before eating secondary food choices like oak trees. If done correctly, native grasses flourish providing better feed in future years, and ESH too, can flourish.

Utilizing these methods, grazing and farming can be in a unique position of not just being ESH dependent, but in a symbiotic relationship where the ESH is also dependent on the farming and ranching techniques for the ESH to thrive. If the land

is left fallow, such as in an attempt to protect ESH, often invasive species are able to out compete the native plants.

The symbiotic relationship between rancher/farmer and ESH needs to be encouraged. The GavPAC and County staff tried to develop policy to encourage agricultural methods which protects and promotes ESH. We now have an opportunity to recommend language in the Gaviota Plan that would encourage these progressive, and protective, agricultural methods. Please support Gaviota ranchers and framers by advocating for the following changes to the CCC staffs' recommended modifications to the Gaviota Plan:

- 1) Add the wording "agricultural practices which protect and expand ESH" to the definition of a resource dependent use that is dependent on the ESH to function, and as such, would exempt these agricultural practices from obligations to avoid ESH.
- 2) Include "agriculture land and agricultural operations" in any definition of "Coastal Resources".
- 3) Continue to advocate for the four agricultural threshold standards included in Supervisor Williams' draft letter to the Coastal Commission, dated May 15, 2018, which, if not exceeded would allow for farming and grazing without a CDP.
- 4) Delete the requirement that a CDP would be required for grazing, as shown in Table 18-2 in the CCC's staff's proposed recommendation #13.
- 5) Restore the word "Rare" to Policy NS-4 as recommended in Supervisor Williams' May 15<sup>th</sup> draft letter to the CCC.
- 6) Continue to advocate that accessory structures be defined as a "principal permitted use".
- 7) Consider removing all of the CCC staffs' suggested modifications that would require an Economic Viability Determination, as it is an unnecessary burden on farmers and ranchers.

Thank you for the opportunity to comment on the CCC's staffs' proposals, and your efforts to preserve and protect our Gaviota Coast.

Sincerely,

A handwritten signature in blue ink that reads "Beverly Boise-Cossart". The signature is written in a cursive style with a long, sweeping flourish at the end.

Beverly Boise-Cossart, President  
Hollister Ranch Cooperative