Public Comment -

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From:

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Sent:

Sunday, October 30, 2022 3:40 PM

To:

sbcob

Subject:

Letter of Support for Nojoqui Farms Appeals 11-1-22

Attachments:

Nojoqui Farms letter for 11-1-22 - Isaacson.docx

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Dear Clerk of the Board of Supervisors,

Please accept this letter of support for the appeals of the Nojoqui Farms Cannabis Cultivation project.

Thank you,

Sally Isaacson

Dear Chairperson Hartmann and Members of the Santa Barbara County Board of Supervisors,

I am writing this letter in strong support of the appeals # 22APL-00000-00021 and # 21APL-00000-00023 against the approval of a Land Use Permit for 22.17 acres of cannabis farming for the "Nojoqui Farms Cannabis Cultivation Project."

Nojoqui Creek consists of about eight stream miles and is a tributary of the Santa Ynez River. It flows north, entering the Santa Ynez River south of Buellton. I understand that the water for this project would be drawn from wells drilled into the alluvium close to Nojoqui Creek.

As a lifelong naturalist and educator, I have lived and taught in the local area for many years. I wish to do all that I can to help in preserving the most special natural areas of our County for future generations. I have brought students both young and old for field trips to the Gaviota and Nojoqui areas and I am very familiar with the special flora and fauna of these parts. In addition, as a rancher, I am concerned about the continuing loss of food-producing acreage in our county.

Researchers (Grantham et. al.) of the University of California at Berkeley have estimated that cannabis uses from 1.0 to 2.4 acre feet of water per acre per year. The data on which their study is based are drawn mostly from the north coast region of California which is cooler and moister than our area. Thus, cannabis grown in our drier and warmer region is likely to demand even more water than this study indicates, due to higher water loss through transpiration.

Using the UCB figure of 2.4 acre feet per acre, the proposed 22.17 acres of cannabis would take 53.21 acre feet of water (17,338,529 gallons) annually. From a human perspective, this is the amount of water that the Environmental Protection Agency estimates is used by 158 average American families each year.

Any massive use of water such as this that is drawn from wells close to Nojoqui Creek is likely to negatively affect the flow of the creek and therefore affect the special flora and fauna of the riparian zone. When water flow declines, water temperature rises. As warm water can hold less dissolved oxygen than colder water, organisms that live all or part of their lives in the stream will be affected. Aquatic and semi-aquatic species, including the protected California red-legged frog, will suffer, as cool clear water high in dissolved oxygen is necessary for egg development.

As this cannabis farm is likely to affect the water flow and pools of Nojoqui Creek, the project should be subject to the cannabis dry season water use forbearance period (April 1 - October 31) that was established for the protection of riparian ecosystems by the State Water Resources Control Board. It should also be subject to careful scrutiny by the California Department of Fish and Wildlife.

In 1991, while studying Steelhead/rainbow trout resources of Santa Barbara County, consultants visited Nojoqui Creek as part of a study of mitigation or enhancement sites. The creek was said to exhibit "serious limitations" on aquatic habitat from intensive land use practices (Payne 1991). According to staff of the Cachuma Conservation Release Board, groundwater pumping may be limiting to aquatic habitat in Nojoqui Creek. Excessive pumping may cause "a significant portion" of the stream to dry (Robinson pers. comm.). Bearing in mind this information, why on

earth would the County of Santa Barbara want to further degrade the riparian habitat in and around Nojoqui Creek by allowing this project to go forward?

The State of California, through its Water Resources Control Board has provided to us the tools to restrict riparian water use for cannabis growing. Why does the County of Santa Barbara continually fail to support state law, and insist instead on supporting the cultivation of this overproduced non-food crop? In doing so, for monetary gain in the short term, our County government jeopardizes local water resources that are critical to maintaining healthy habitats as well as local food crop production for the long term.

When making your decision, please consider that our local wildlife and our food-producing farmers are dealing with long-term drought. For eight of the last ten years, rainfall, as measured at the Buellton Fire Station, has been below average. According to Scientific American, the United States is in the throes of a megadrought which is the worst in 1,200 years.

I realize that the Planning Commission has given a nod to water use restriction for this project, however I hope that the Board of Supervisors will reject this project entirely in the interest of protecting our environment for future generations.

Respectfully,

Sally Isaacson