



September 10, 2012

Chairwoman Doreen Farr
Santa Barbara County Board of Supervisors
105 East Anapamu Street
Santa Barbara, CA 93101

Re: Allocation of CREF Grants in the 2013 Cycle

Dear Chairwoman Farr and Honorable Supervisors:

Please accept this letter on behalf of the Environmental Defense Center (EDC), in response to the proposed allocation of CREF grants in the 2013 cycle. Unfortunately, we just learned about this hearing on Friday, so we were not able to submit our comments in a more timely manner. As we have stated in previous years, we are concerned that the initial purpose and structure of the CREF program continues to be eroded, and that the public has been left out of the normal CREF allocation process.

The EDC is a public interest law firm that protects and enhances the local environment through education, advocacy and legal action. Since 1977 we have empowered community based organizations to advance environmental protection. Since our inception we have represented local groups concerned about the impacts caused to our communities by offshore oil and gas development, and we were involved in the original establishment of the CREF program. We believe that the current proposal fails to adhere to two core principles of the CREF program: (1) allowing competition for CREF awards by public agencies, municipalities, special districts and non-profit organizations; and (2) ensuring availability of funds for coastal acquisition projects.

The historic practice for allocating CREF funds was to provide a public application process and schedule for submission of proposals, and then a public hearing to review and consider such proposals in accordance with established criteria. This year it appears that there was no opportunity for various qualified entities to compete for

CREF awards. This practice inappropriately limits the scope of proposals and options available for your Board's consideration.

Second, the recommendation before your Board does not include any allocation for acquisition. As you know, several important acquisitions in our County were made possible through CREF awards, including the Carpinteria Salt Marsh, Carpinteria Bluffs, Santa Claus Lane, Douglas Family Preserve, Las Positas Park, Del Playa Bluffs, Ellwood Mesa, Gaviota Coast, Point Sal, and Burton Mesa, just to name a few. Even if funds are not expended on acquisition in a particular year, it is important to increase these funds so that they are available when needed in future years.

Thank you for considering these two principles when making your decision on the CREF grants for 2013.

Sincerely,



Linda Krop
Chief Counsel

cc: Chandra Wallar, CEO
Doug Anthony and Kathy Pfeiffer, Energy Division