

**Santa Barbara Audubon Society, Inc.**  
A Chapter of the National Audubon Society



5679 Hollister Avenue, Suite 5B, Goleta, CA 93117

(805) 964-1468

July 8, 2010

Santa Barbara County Board of Supervisors  
Chair Janet Wolf  
[sbcob@co.santa-barbara.ca.us](mailto:sbcob@co.santa-barbara.ca.us)

**RE: Local Coastal Plan Proposed Modifications**

Dear Honorable County Supervisors:

Santa Barbara Audubon Society (Audubon) is a local non-profit organization involved in habitat conservation and restoration. While there are aspects of the modifications to the Local Coastal Plan (LCP) proposed by the Coastal Commission staff that we support, other sections we find disturbing.

Audubon would like to see a process for small beneficial restoration projects that is not cost- and time-prohibitive and not a disincentive to implement such projects.

Perhaps projects that qualify for the CEQA-exemption under section 15333 would also be eligible for a simple CDP.0000000000

At the GavPAC on June 21<sup>st</sup>, the county staff presented data on the average current P&D costs/time for a Coastal Development permits (CDP)...

CDP is \$776 and 67 days

CDPH (with hearing) is \$5000 and 166 days. CEQA review required, so probably additional consultant expenses.

We would like to propose a solution, as we recognize that the CCC staff is concerned that applicants may be trying to use DCPs for restoration as a guise for other projects that are not protective of the coastal environment.

The California Environmental Quality Act was revised in 2004; one revision Section 15333 provides for an exemption from CEQA for beneficial restoration projects that meet the following criteria:

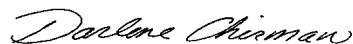
**15333 – Exemption for Restoration Projects.** A new categorical exemption has been created for small habitat restoration projects on 5 acres or less of land. The exemption is limited by the restrictions of Guidelines Section 15300.2. Examples of small restoration projects include: revegetation with native plants; wetland restoration to improve waterfowl conditions; stream or bank restoration to benefit native fish or amphibian habitat; habitat restoration or enhancement projects being undertaken with hand, rather than mechanized, labor; stream or bank stabilization with native vegetation for the purpose of eliminating erosion and sedimentation; and culvert replacement conducted in accordance with DFG or NOAA Fisheries guidelines for the purpose of improving habitat and reducing sedimentation.

A project meeting these criteria could be eligible for a simple CDP, as determined by P&D staff. This would provide that the project, as determined by Planning & Development staff, to be a beneficial project and have no permanent negative environmental impacts.

Audubon is concerned that ag permits would largely be bumped to CDPH as well, and may again be disincentives rather than promoting agriculture. However, our chapter has not expertise in this arena, and would defer to the agricultural community for recommendations of appropriate modifications.

Santa Barbara Audubon appreciates the care that Santa Barbara County is taking to review the proposed modifications to the LCP, so that the revised LCP will be protective of natural resources, but not provide disincentives to landowners for habitat restoration and preservation of agriculture in our county.

Sincerely,

A handwritten signature in cursive script that reads "Darlene Chirman".

Darlene Chirman, President  
Santa Barbara Audubon Society

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