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environmental
DEFENSE CENTER

March 13, 2009

Joseph Centeno, Chair
Santa Barbara County Board of Supervisors
105 East Anapamu Street
Santa Barbara, Ca 93101

**Re: 2009-2010 Annual Work Program and Mid-Year Report For Land Use
Planning Projects and Policy Initiatives**

Dear Chairman Centeno and Board Members,

The Environmental Defense Center (EDC) is a non-profit public interest law firm that protects and enhances the environment through education, advocacy and legal action. EDC appreciates the opportunity to review and provide comments on the 2009-2010 Annual Work Program and Mid-Year Report for Land Use Planning Projects and Policy Initiatives (Work Program). EDC recognizes the hard work of County staff on this Work Program and the multiple long range planning challenges facing the County. We support the Planning Commission's prioritization of a new **Gaviota Rural Regional Plan** and **Climate Action Strategy**. However, EDC is concerned that the proposed Work Program and the budget for Office of Long Range Planning need to be reprioritized to fund a new **Gaviota Plan** and **Climate Action Strategy** and to efficiently utilize scarce County financial resources. The County's current budget crisis emphasizes the need for a close look at the structure and organization of the Office of Long Range Planning, its relationship to the Planning and Development Department and the need for improved capabilities to deliver high priority work products. We believe that major reconsideration of the focus and direction of County long range planning is in order and believe that it is imperative the budget for Fiscal year 2009-2010 reflect Board and community priorities. This matter cannot await the hiring of a new Director for Planning and Development. Clear Board direction is immediately required on budget priorities for Fiscal Year 2009-2010 and beyond.

Therefore, the EDC requests that the County redirect scarce financial resources to areas of critical planning and environmental concern that address pressing issues arising as a result of development pressure in key areas of the County. Such pressures, and resultant potentially irreversible environmental impacts, are most evident within **Gaviota**. In addition, to address climate change and comply with SB 375, the County must also proceed now to develop a **Climate Action Strategy**. To address these issues, EDC

strongly recommends that the Board of Supervisors direct a major overhaul of the current proposed Work Program and reallocate resources as outlined below.

Proposed Board of Supervisors Action: As part of a revised Work Program budget submittal for Fiscal Year 2009-2010, direct the Office of Long Range Planning to:

1. Significantly reduce administrative and management overhead of the Division to free up funds to perform critical long-range planning tasks.
2. Apply for grants beginning in the remainder of FY 2008-2009 to fund high priority planning efforts.
3. Reprioritize the budget to defer work on second order priority programs (e.g. parking studies, revised design guidelines) to free up funds for highest priority work.
4. Reassign staff and/ or hire consultants to immediately commence work on the preparation of a **Gaviota Plan**, with the goal of having such a plan completed and submitted to the Coastal Commission within 3½ years.
5. Direct staff and/or hire consultants to immediately commence work on the preparation of a **Climate Action Strategy**.
6. Schedule a Planning Commission workshop for June of 2009 to provide general direction for start up of the new **Gaviota Plan**, including:
 - a. Proposed funding levels, including both general and grant fund projected to be available
 - b. Project schedule
 - c. General technical work program
 - d. Options to better integrate review of current development projects and long range planning on Gaviota Coast
 - e. Consideration of community input and concerns
7. Form a project team to:
 - a. Work with Office of Long Range Planning staff to refine the submitted budget to reflect the above listed priorities,
 - b. Oversee the full reintegration of the Office of Long Range Planning into P&D,
 - c. Review appropriate changes in the Office of Long Range Planning's management structure, staff to management ratios and other efficiency measures as needed.

Discussion: A review of the Office of Long Range Planning's current budget reveals that the Office's current work program focuses on small projects, such as limited community plan updates or new guidelines. While these projects are important, some appear to have limited effect on key long range planning matters facing the County as a whole. The current work program should assure that immediate efforts are directed toward resolving many major issues arising in the development review process such as the protection of the Gaviota Coast, climate change, agricultural land, and transportation/ long-distance commuting. In addition, the County's overall Comprehensive Plan is over 28 years old and is badly in need of update and unified County-wide planning. A review of the Work Program indicates that more than \$700,000 of the Division's budget is given over to

“operations management” and “required services”, substantially limiting funds available for planning work. While many of these tasks may be important, pressing long-range planning needs warrant a thorough reassessment of the Office’s spending priorities, including verification of required or mandated services and their related current budget allocations.

EDC believes that the County could substantially increase its use of available grant funds to offset the cost of a new **Gaviota Plan** and **Climate Action Strategy** and reduce the burden on the General Fund. State grant agencies such as the State Coastal Conservancy and Wildlife Conservation Board have long expressed interest in Gaviota planning and resource protection issues. In addition, given Gaviota’s recognized national importance, other grant funding sources, including federal funds, local grant organizations and larger private foundations can be expected to be amendable to considering requests to help fund Gaviota planning work. In general CREF should not be used for normal County operations, however given the significant nexus between the Gaviota Coast and offshore oil development, CREF can be used to fund the **Gaviota Plan**. In a time of budget crisis, the County should energetically pursue the acquisition of funds from such sources. Funding from such sources needs to be pursued energetically in order to ensure that Gaviota planning efforts can be fully funded in Fiscal Year 2009-2010 and beyond.

The timing is right for grant funding to develop a **Climate Action Strategy**. Many foundations are focused on climate change and should be approached for grants to fund the Climate Action Strategy.

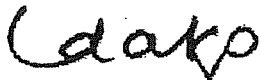
In addition to reprioritizing workload and seeking grants, the Office of Long Range Planning’s management structure and its relationship to the remainder of P&D warrant careful review and consideration. A restructuring of the Office’s management has the potential to increase efficiency and conserve scarce County resources. Areas of concern include ensuring that the Division is fully reintegrated into P&D and that lines of authority and management structure reflect this integration. In addition, management to staff ratios should be reviewed for consistency with other divisions within P&D and to historic norms within the organization to ensure that County funds are used in the most efficient and cost-effective manner possible. Potential management restructuring should focus on freeing up funds to maximize planning work.

The EDC believes that it is critical the Office of Long Range Planning’s Work Program be immediately redirected to key long deferred planning efforts, particularly a new **Gaviota Plan**, and to the **Climate Action Strategy**. The current Work Program calls for commencing work on a Gaviota Plan next fiscal year, with completion in 2014, over 5 years from now. Given lengthy delays encountered by other long range planning projects (e.g. 8 year Housing Element process), this deadline could extend even further. The statewide and national importance of the Gaviota Coast and the severe threats facing the integrity of this resource make this type of delay unacceptable. We believe that the County can and should complete a **Gaviota Plan** in approximately 3&1/2 years and request that the Work Program reflect this goal. Threats associated with climate change,

and the fact that state laws (e.g. AB 32 and SB 375) require County action, also mandate prompt action to initiate development of a comprehensive **Climate Action Strategy** for the County.

In closing, the EDC understands that there will never be sufficient funds to address all of the outstanding planning issues facing the County. However, we believe that the immediate funding of a **Gaviota Plan** and **Climate Action Strategy** must be of the highest priority, necessitating a careful review of the structure and workload of the Office of Long Range Planning. We also recognize that reprioritizing the work program will require tough decisions regarding delays or cut backs in other programs, but believe that resolving long debated and litigious planning issues on the Gaviota Coast, and preparing for state-mandated actions concerning climate change, must be considered the highest priority.

Sincerely,



Linda Krop,
Chief Counsel



Brian Trautwein,
Environmental Analyst