



November 2, 2016

Honorable Peter Adam, Chair
County of Santa Barbara Board of Supervisors
123 East Anapamu Street
Santa Barbara, CA 93101

via e-mail to: sbcob@co.santa-barbara.ca.us

Re: Comments on the Gaviota Coast Plan.

Dear Chair Adam and Members of the Board,

The Hollister Ranch Owners Association (“Association”) appreciates the opportunity to offer these brief comments on the Gaviota Coast Plan Final Environmental Impact Report (“FEIR”), the revised Plan and the proposed ordinance amendments as approved by the Santa Barbara County Planning Commission on September 19th.

The Association represents the 136 privately owned parcels that comprise the 14,500 acre Hollister Ranch. The Association staff and many individual owners fully participated in the 68 Gaviota Plan Advisory Committee (“GavPAC”) meetings and the many subcommittee meetings for specific issue areas as well as the Planning Commission and Board of Supervisors meetings that followed in 2014 and 2015, and, more recently, the recent Planning Commission meetings this last August and September.

As a general statement on the planning process and philosophy of community planning we believe that **absent clearly identified, overriding legal or policy issues, the Plan developed by the GavPAC and the community is the Plan that should be approved by the Board of Supervisors.**

We sincerely appreciate the consideration that the planning commissioners and county staff gave to our extensive input in refining the Plan and related documents. This input was consistent with that of other landowners in the Plan area and we thankfully acknowledge the consideration given in making refinements to the Plan from the version that was initially presented to the Commission in August. This version was a significant departure from the Plan approved by the GavPAC and the version subsequently approved by the Planning Commission last month is a significant improvement.

MT Zone District Proposal

We are supportive and thankful for the Commission’s rejection of the proposal to apply the MT Zone District to agriculturally zoned lands with steep slopes. Such a designation would erode the agricultural heritage of the area along with the scenic working landscapes they provide, and, threaten the economic viability of the smaller ranches and farms in the planning area. The Steep Slope Standards is a reasonable alternative that addresses the concerns about farming activities on steep slopes without compromising the viability of agricultural operations.

The only improvement that we recommend to the Standards is a **clarifying addition to specifically exclude cattle grazing from the development standards.**

ESHA Mapping.

We also support Staff's recommendation, and the Commission's subsequent action on that recommendation, to limit new Environmentally Sensitive Habitat Area (ESHA) mapping associated with development approvals to the project footprint and not the entire parcel.

Recommended Changes to the Plan.

There are several issue areas that could benefit from further refinement and produce a better outcome of your review process.

First, the GavPAC's original chapter addressing Parks, Recreation and Trails should be reinstated. County staff has unilaterally revised this chapter of the Plan, in effect undoing the results of substantial deliberations by the GavPAC, GavPAC Trails Subcommittee and Trails Siting Guidelines Working Group. The intent and vision of the GavPAC and community have been altered to the point where the GavPAC's and stakeholders' vision is no longer recognizable. This alteration of the Plan, not only undermines the democratic process, but by ignoring stakeholders' contributions and interests, ensures ongoing and prolonged conflict regarding the implementation of additional park and trail opportunities on the Gaviota Coast. Revisions made by Staff erode protections for property owners, agricultural operations and sensitive resources.

Further, we ask that the matter of trails through areas of sensitive resources be addressed through the following addition to the policies, as Policy REC-4 (renumbering other policies appropriately) *"Appropriate public recreational trails may be allowed within setbacks or buffer areas, but only if accompanied by a managed access plan developed by the entity holding the trail easement in consultation with the landowner. Implementation shall provide for regular monitoring of the effects on habitat, species and cultural resources. Restriction or even temporary suspension of access may result if negative impacts are documented."*

Second, there needs to be a consideration for clearance required by insurance companies in the ESHA policies. The County Fire Department should determine the clearance distance from structures and that area be exempt from the ESHA restrictions.

Third, while verbal assurances have been offered that grazing is exempt in ESHA's, explicit clarification should be included in the Plan. The exemption may already be stated as part of other County policies, but to prevent future misinterpretation or misunderstanding it should also be explicitly stated within this Plan.

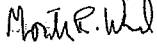
Final Environmental Impact Report.

Although the primary subject of this letter is not the Final EIR, we believe the environmental analysis and the response to comments on the Draft EIR are deficient in most of the same respects we noted in our comment letter of September 3, 2015. In particular, the lack of clear

definition of baseline conditions and articulation of the baseline resources makes the analysis of true environmental impacts difficult and leads to changes not consistent with the GavPAC Plan. Failure to correctly identify impacts from changes actually proposed by the Plan, and instead attribute impacts to activities such as residential development potential and agriculture that are not substantively changed, leads to misstatement of impacts and misapplication of mitigation requirements. We note that the staff failed to correct these problems in the Final EIR.

Thank you for your consideration of these comments.

Sincerely,

DocuSigned by:


Monte R. Ward, President