

South Coast Habitat Restoration

P.O. Box 335 • Carpinteria, CA 93014

www.schabitatrestoration.org

July 1, 2010

Honorable Janet Wolf, Chair
Santa Barbara County Board of Supervisors
105 E. Anapamu Street, Fourth Floor
Santa Barbara, CA 93101

Re: Proposed Amendments to the Coastal Land Use and Development Code.

Dear Honorable Supervisors:

South Coast Habitat Restoration is deeply concerned about the amendments to the County's Land Use Development Code (LUDC) proposed by the California Coastal Commission (CCC) and the effect these amendments will have on voluntary restoration projects in Santa Barbara County. South Coast Habitat Restoration works with private property owners on managing voluntary habitat restoration projects in Santa Barbara County. As such, we have seen how property owners are already reluctant to take on habitat restoration projects on their own as a result of the difficulty navigating the permit process and their cost. Additional, restrictions and costs will only decrease property owner's participation in restoration projects.

Included in the Coastal Commission's proposed amendments is a provision that each zone district have one Principally Permitted use and that all other uses require a CDP with a hearing (CDH) and be directly appealable to the Coastal Commission. Since restoration is not a Principally Permitted use in any zone district, this new interpretation of the Coastal Act by Coastal staff would mean that every restoration project would now require a hearing.

Per County staff's own analysis, a CDP with hearing costs six to seven times more than a straight CDP – and that is just the costs of processing with the County. There are also the additional costs of preparing a complete CDH application and the added consultant costs and time associated with having to go through a hearing process. It is already the opinion of many people performing voluntary restoration projects that the cost of processing permits is a huge impediment to completing restoration projects as the permit costs often rival, or even exceed, the actual cost of the restoration. In fact, this is what has led to the efforts by groups such as Coastal Ranches Conservancy, Natural Resource Conservation Service, Cachuma Resource Conservation District and others to streamline the permit process for voluntary habitat restoration projects. Requiring all restoration projects to go through a hearing is directly counter to these streamlining efforts, and is likely to have a chilling effect on voluntary restoration projects in our County.

We understand that you are hearing from many members of the community, as there are many other implications of the proposed modification that have the potential to affect many more property owners than this issue. However, we feel that the issue of encouraging voluntary restoration projects is very important and we urge you to not allow this issue to get lost in the process.

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We respectfully request that you communicate the importance of restoration projects to the Coastal Commission and work to ensure that restoration projects do not get caught up in this regulatory requirement that would require a Coastal Development Permit with a hearing. In the event that the Principally Permitted Use language is adopted, modifying the language so that restoration projects can be either a principally permitted use in every zone district, or considered accessory to all principally permitted uses would resolve this issue. Strong, decisive action from your Board can ensure that quality restoration projects continue in Santa Barbara County.

Thank you for the opportunity to comment on this important matter. We look forward to seeing how your Board decides to deal with the Coastal Commission's proposed modifications at next week's hearing.

Sincerely,



Mauricio Gomez, Director
South Coast Habitat Restoration
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cc: Glenn Russell, Director, Planning and Development