

Guner Tautrim  
Orella Ranch, Gaviota Ca. 93117

Re: July 6, 2010 Hearing re Coastal Commission Proposed Modifications to SB County LUDC;

Dear Santa Barabara Board of Supervisors:

I am writing in hopes of your consideration for asking for more time to digest the substantial changes recommended by the Coastal Commission staff. In theory I support the Coastal Act and believe the Coastal Commission has been a great asset to our state. However, these changes suggested by staff concern me.

For one the Coastal Commission has not led an open and transparent process, which includes full review of the impacts of their proposals, as well as public input through an open exchange process. This is required by law is it not?

For me, a sixth generation land steward on the gaviota coast who is dedicated to the increased success of sustainable agriculture, these changes will be crippling. I must say I am confused. I thought we as a society were becoming more and more in tune with the pitfalls of conventional industrial agriculture and the ramifications it has on the health of our people and the health of our lands. Armed with this knowledge it has been my intent to incentivise good land stewardship practices. This is why I am on the Gaviota Planning Advisory Committee. Many of the proposed changes will harm the small rancher/farmer who is trying to do the right thing. Below are some of my concerns.

**1. Inadequate opportunity for public review and input.** We only recently have become aware of the proposed changes to the LUDC and believe that only a handful of landowners are aware of this process and its potentially serious impact on them. The Commission staff, whose members work in San Francisco and Ventura, developed these recommendations **without any public process** to take input from the ranchers and others who would be impacted by the

amendments.

**2. Unreasonable Constraint on agricultural practices.** Changing the agricultural use on a property from grazing to orchards or row crops would require a Coastal Development Permit that could be appealed to the Coastal Commission, making such improvements too expensive and time consuming to even consider. As ranchers and farmers, we need flexibility to respond to market conditions and general economic climate to keep our operations viable. There are many unanswered questions around what ag intensification means. We need more time and input to assess these things.

**3. The classifications Principle Permitted Use and Permitted Use blur and confuse established compatible use policies related to agriculture.**

Common examples of necessary compatible uses are resource management and necessary related residential and commercial uses. As a result of downgrading these uses and creating additional layers of permitting, family dwellings and many other facilities which support the agricultural operations would likely be subject to overly burdensome permitting requirements, arbitrary application of policies in permit review, and, a potentially extended approval process that ranchers can ill afford.

For example: The "primary dwelling" on an agriculturally zoned lot should never be considered an "exception" but recognized as a right that should be defined as a "principal permitted use" (PP). This right should not be restricted, but recognized unequivocally as a "principal permitted use. Also of concern here are the ramifications on restoration. I would highly recommend that restoration be an accessory use within the principle permitted use in all zone districts. I also disagree with the wholesale prohibition of non-profit entities being on Ag land. If the non-profit relates to the zone district it is on then why prohibit it. In addition, I am in support of community scale wind and solar and they have prohibited wind energy from all coastal zones when in fact much of our coastal zone has great wind resources.

**4. Adding unreasonably excessive costs.** Limiting the type of agriculture on the land and requiring a coastal development permit to change or update

agriculture programs, build a house or an ancillary structure or maintain the operations will cost each of us unreasonable time and money in permit fees, consultant charges, and added oversight of our properties. These costs will make it prohibitive to undertake these improvements to our ranches. Moreover, these new proposed requirements are in dramatic contrast to the streamlining efforts developed by the County.

Fortunately, the Gaviota Coast has a local collaborative process currently underway with the Gaviota Planning Advisory Committee (GavPAC) to update the Gaviota Coast Plan. The process includes local and state government (State Parks and CalTrans), landowners, ranchers, business interests, and environmentalists. The GavPAC is an open, process with public meetings, including an Environmental Impact Report with public review. This GavPac process is addressing many of the issues critical to agriculture that the Coastal Commission staff are trying to preemptively modify including: A) Long-Term Agriculture Viability; B) Resource Protection, and, C) Trails and Public Recreation. We believe that absent any meaningful public process that the Coastal Commission staff could put initiate at this late date, the logical and fair thing to do is to let the GavPAC complete its process.

Thank you for your consideration on this matter.

Guner Tautrim July 1 2010