



PROMOTING CONSERVATION AND
HABITAT RESTORATION ALONG THE GAVIOTA COAST #5

June 30, 2010

David Hill
President

Chairwoman Janet Wolf and Members of the Board of Supervisors
County of Santa Barbara

Caryl Collins
Secretary

105 East Anapamu Street
Santa Barbara, California 93101

Subject: California Coastal Commission Suggested Modifications
To the Land Use Development Code

Board of Trustees

Michael Benedict

Dear Chairwoman Wolf and Members of the Board of Supervisors,

Mark Chaconas

Caryl Collins

Thank you for the opportunity to comment on the California Coastal Commission staff's suggested modifications to Santa Barbara County's Land Use Development Code.

John Deily

David Hill

Kim Kimbell

The Coastal Ranches Conservancy is a local non-profit dedicated to the enhancement and protection of the natural environment of the Gaviota Coast by supporting research, education, restoration and conservation projects. Specifically our organization has supported steelhead restoration projects, native grass propagation, riparian protections, conservation education, and control of harmful invasive weeds on public and private lands.

Science Advisor

Sue Benech-Field

Often the expense and difficulty in obtaining permits is a major obstacle to implementing beneficial environmental projects. We have been working, with the help of a grant from the Bower Foundation, to improve the process so that good environmental projects and ranching practices are encouraged.

Trustees Emeriti

Doug Campbell

Fos Campbell

Luella Connelly

Jack Stapleman

We feel that the California Coastal Commission (CCC) staff's suggested modifications to the Santa Barbara County's Land Use Development Code (LUDC) will deter instead of encourage good natural resource protection projects and do little to preserve sustainable agriculture.

Monte Ward

Nancy Ward

Larry Williamson

Furthermore, the CCC's proposed changes have had virtually no opportunities for public review and comment, and no time for citizens and agencies to consider, deliberate and advise. This is not the way public policy should be imposed and runs counter to the transparent and collaborative manner that the County undertook during the original adoption of the LUDC.

The CCC staff proposal will undermine the Gaviota Coast Rural Planning Update and result in prematurely determining the outcome of the GavPac--which conducts its business with open public meetings and is considering ways to contribute to agriculture's long-term viability, protect natural resources, and enhance public recreation opportunities.

Thus, these suggested modifications by the CCC staff will result in a lost opportunity to create local changes to our regulations that can enhance resource protections, create environmentally beneficial projects on private land, and streamline agricultural permit processing which are solutions your Commission has recently and successfully addressed.

Specifically, the CCC staff's suggested modifications that are a serious concern include:

- Establishing Principle Permitted Uses. This is a significant departure from the County's traditional approach to agricultural zoning and will result in an expanded role by CCC staff in regulating agriculture in Santa Barbara County by requiring additional permit review, significant costs and unknown delays.
- Requiring a CDP for a change in scope or intensification of agriculture operations. The policy is unclear and does not provide a landowner flexibility to manage their operations. It is impractical for a landowner who is able to increase their grazing operation or utilize a portion of their private property for an alternative agriculture crop to apply for a CDP.
- Mandating a CDP for a lot line adjustment or merger. This suggested modification will create a prohibitive regulatory environment that may result in creating little incentive for property owners who want to enter into Williamson Act Contracts. These contracts are important management tools and proven to preserve long-term agriculture.
- Limiting a development envelope to 10,000 square feet. Currently, the County's Uniform Rules allows a two-acre development envelope for property that enters into a Williamson Act Contract. Clearly, there will be little incentive to enter into a Williamson Act Contract when a landowner is faced limiting their development area to less than 1/4 acre plus in addition to the extra time and processing costs associated with a CDP.

It appears that CCC staff's intent is to expand their regulatory role by mandating changes to our local coastal plan. These modifications will emasculate the GavPac effort, waste over a year's time and squander the significant resources invested in the local process. This is an insulting attempt to undermine the locally supported general plan update that is now occurring in the Gaviota planning area.

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These modifications will weaken our County government's ability to determine its own coastal plan and will negatively impact long-term agriculture viability, resource protection, and public recreation.

We respectfully encourage the Board of Supervisors to reject the Coastal Commission staff's modifications to the LUDC.

Thank you for the opportunity to comment on these important matters.

Sincerely,

A handwritten signature in cursive script that reads "David Hill".

David Hill, President

Coastal Ranches Conservancy

