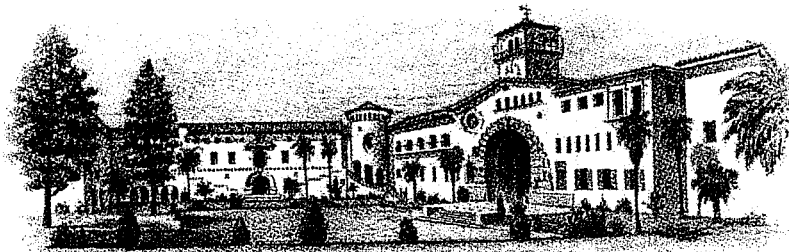


DOREEN FARR
Third District Supervisor



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COUNTY OF SANTA BARBARA

November 15, 2010

Bonnie Neely, Chair, and Commissioners
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

RE: Santa Barbara County Local Coastal Program Amendment No. MAJ-1-09 (Land Use and Development Code, Montecito Land Use and Development Code, and Two Parcel Rezone, Montecito)

Dear Chair Neely and Members of the Commission,

On November 9, 2010 the Santa Barbara County Board of Supervisors directed that I be the Board's representative at the Coastal Commission meeting this Thursday, November 18th. Shown below are the items of concern that I will address in person at the November 18th meeting.

The Santa Barbara County Board of Supervisors greatly appreciates the time and effort your staff has committed to working with County staff to address the remaining substantive concerns with the suggested modifications as proposed by Commission staff. Our staffs were able to address the County's concerns regarding designating artist studios and guesthouses as accessory uses to principal permitted residential uses.

However, the Santa Barbara County Board of Supervisors remains very seriously concerned about several of the suggested modifications that would delete several uses currently allowed by the County's certified coastal zoning ordinance. In addition, a number of current uses would become subject to new or additional permitting requirements resulting in a much longer and more expensive permit process. We feel these modifications are not necessary to ensure compliance with Coastal Act goals and policies and that our current process in these areas both meets the need of protecting precious coastal resources as well as meeting the needs of Santa Barbara County residents. These modifications include:

- Increasing the permit requirements for agricultural operations. The Board of Supervisors remains extremely concerned with the suggested modifications that would require the expansion of existing or new agricultural operations, including open field agriculture, orchards, vineyards, and grazing, to obtain a Coastal Development Permit (and an appealable CDP for those operations located in the appeals jurisdiction) and requests that these activities remain exempt from a CDP.

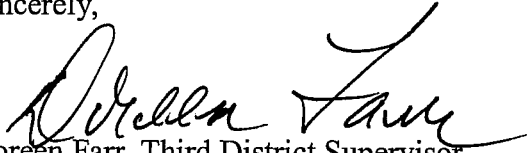
- Increasing the permit requirements from an exemption to a Coastal Development Permit for the keeping of animals associated with agricultural operations and the keeping of large animals as accessory to residential uses. The Board of Supervisors requests that the keeping of animals in both situations remain exempt from a CDP requirement.
- Increasing the permit requirements for residences on agriculturally zoned lands. The Board is equally concerned with the suggested modification proposing to limit the size, occupancy and development area of residences on agricultural parcels and requiring those that exceed the standards be reviewed under an appealable CDP. It appears that this requirement has not been applied to residential uses on agriculturally zoned parcels anywhere else in the State. The Board requests that the Coastal Commission allow residential uses consistent with the development area requirements contained in the Williamson Act and the County's Uniform Rules for agricultural preserve contracts. Applying these same standards provides both flexibility and consistency for our farming and ranching families in the coastal zone as well as continuing to protect valuable agricultural land from conversion to other uses through the use of clustering of structural development in limited sized development envelopes.
- Limiting repairs of and prohibiting new staircases serving private access on a coastal bluff. The policies cited by your staff to justify the distinction between staircases on bluff faces that serve public and private access apply equally to both. These policies speak to the careful consideration of bluff stairways, whether or not they serve public or private access. The County has successfully balanced the requests for access stairways with the policies protecting bluffs, evidenced by the fact that not one bluff stairway, public or private, has been appealed to the Coastal Commission. The Board of Supervisors requests that the Coastal Commission delete the suggested modification prohibiting private stairways and rely on the appeal process to address situations where the Commission or the community do not feel the County appropriately protected the bluffs.
- Requiring an appealable Coastal Development Permit for voluntary mergers and lot line adjustments. The County requests that the Coastal Commission treat Santa Barbara County as it has treated Sonoma County and exempt Lot Line Adjustments and Voluntary Mergers which do not result in an increase in the number of lots or allowable residential units from a CDP requirement.

The County Board of Supervisors understands that the goal of the suggested modifications is to implement the policies of the Coastal Act that seek to protect sensitive coastal resources including access to the coast. The County shares this goal but feels that these suggested modifications are not required to ensure compliance with the Coastal Act and impose unnecessary increased costs and requirements on coastal landowners.

The Board of Supervisors has received a large volume of emails and heard testimony from dozens of individuals and community organizations at our community meetings and Board of Supervisor hearings on these proposed modifications. All speakers, except for three or four, were vehemently opposed to these changes. They feel that our current process in the above areas has worked quite well in the past and that these are not problem areas in our County that need to be "solved" by the suggested modifications.

Given how strongly our residents feel about the above modifications, I believe that the Board of Supervisors will find it extremely difficult to accept certification of the Montecito and County Land Use Development Codes, and may choose to retain our current Coastal Zoning Ordinance if we cannot come to an agreement with the Coastal Commission on these critical issues.

Sincerely,

A handwritten signature in black ink, appearing to read "Doreen Farr". The signature is fluid and cursive, with a large initial "D" and a long, sweeping tail.

Doreen Farr, Third District Supervisor
Santa Barbara County Board of Supervisors