



# SANTA BARBARA COUNTY CATTLEMEN'S ASSOCIATION



P.O. Box 303, Los Alamos, CA 93440

*"WORKING TO SAVE RANCHING"*



June 6, 2016

**SENT VIA EMAIL TO [BOARDLETTERS@CO.SANTA-BARBARA.CA.US](mailto:BOARDLETTERS@CO.SANTA-BARBARA.CA.US)**

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

Re: Request to Continue Item #8 of June 7, 2016 Agenda or to Reject Coastal Commission Proposed Changes

Dear Chair Adam and Honorable Supervisors,

I submit this comment letter on behalf of the Santa Barbara County Cattlemen's Association (SBCCA). It has come to the attention of the SBCCA that the Coastal Commission, at its staff's urging, has proposed to insert troubling language into the County's originally proposed ordinance addressing construction, repair, and improvement of historic resources. A great deal of confusion arose among our membership regarding this proposed insertion because they were urged to believe that the insert didn't substantively change the County's proposal. After closer review, we are convinced that this is not accurate. These changes **are** potentially significant for the reasons stated below in more detail. Our members would like an opportunity to present their concerns because there are many historical structures on agricultural land within the Coastal Zone.

In a nutshell, our concerns arise from the insertion of language that essentially discounts the importance of historical structures, even those designated as historical landmarks, by saying that if the proposed alteration is "inconsistent with any coastal resource protection policies of the LCP," it will be prohibited regardless of historic merit. That kind of broad prohibition is inconsistent with the California Coastal Act and the County's Coastal Plan.

For example, the Coastal Act provides:

Section 30001 -- The Legislature hereby finds and declares: . . . That existing **developed uses** . . . are essential to the economic and social well-being of the people of this state.

Section 30001.5 -- The Legislature further finds and declares that the basic goals of the state for the coastal zone are to: (a) Protect, maintain, and, where feasible, enhance and restore the overall quality of the coastal zone environment and its natural **and artificial resources**.

30007.5. The Legislature further finds and recognizes that conflicts may occur between one or more policies of the division. The Legislature therefore declares that in carrying out the provisions of this division such conflicts be resolved in a manner which **on balance** is the most protective of significant coastal resources.

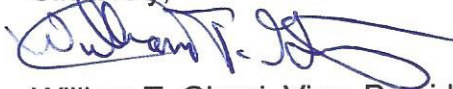
The County Coastal Plan Policy 1-2 states that "Where policies within the land use plan overlap, the policy which is most protective of coastal resources shall take precedence."

Historic structures are valuable coastal resources that must be preserved and protected as part of our culture. Our concern is that the proposed language makes historic structures less important than other coastal resources if two overlapping or conflicting policies apply. In our view, given the importance of historic structures, the same balancing should occur **with consideration of their historic status, not "regardless of historic status" as the added language states. Equally important – the added language gives priority and precedence to this undisclosed other coastal resource protection policy or policies without specifying what they might be.**

We believe that the proposed language upsets the balancing act among the various coastal policies, a balancing act that the above language from the Coastal Act and Santa Barbara County Coastal Plan anticipates and addresses adequately.

We ask that you either reject the proposed additional language or continue this hearing to July 19, 2016 to give our concerned members a chance to provide additional evidence on this subject.

Sincerely,



William T. Giorgi, Vice President