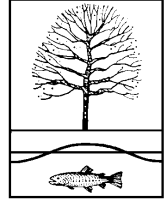


## *SANTA BARBARA URBAN CREEKS COUNCIL*

P.O. Box 1467, Santa Barbara, CA 93102 (805) 968-3000



November 5, 2010

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

transmitted via email noel@county.santa-barbara.ca.us

### **Re: CCC Suggested Modifications to LUDC**

Dear Chair Wolf and County Board of Supervisors,

The Santa Barbara Urban Creeks Council (UCC) is a 501(c)3 non profit that has advocated for the interests of sound watershed planning for over 20 years on Santa Barbara County's south coast. Over that time we have served as a voice for over 3000 families and residents living in the region who are very interested in seeing that environmental protections are adopted that ensure the preservation and health of our dwindling coastal resources. UCC is a strong proponent of habitat restoration, and has been a leading practitioner of habitat restoration projects in southern Santa Barbara County.

We support the Coastal Commission and we support the Commission's Suggested Modifications as necessary to ensure that the County Code complies with the Coastal Act. The Coastal Act has been critical to protecting Santa Barbara's Coast including protection against water pollution, habitat loss, loss of farmland, and impacts to scenic views. The Coastal Act has been instrumental in helping to protect such places as Ellwood, Carpinteria Bluffs, Douglas Family Preserve, Goleta Beach and Gaviota Creek and has helped defend against unnecessary development and pollution at Gaviota. The Coastal Act is critical to protecting irreplaceable coastal resources such as at Naples and More Mesa.

The Suggested Modifications protect the public's right to participate in land use decision-making processes by clarifying and maintaining the opportunity for public notice, public hearings and appeals. The modifications would clarify that lot mergers - like those that fostered the proposed development at Naples - require permits and are subject to public scrutiny and appeals. This debate over permits for lot mergers is part of the ongoing conflict and is part of the Environmental Defense Center's, Surfrider's and the Naples Coalition's litigation over Naples.

The Suggested Modifications clarify when land use activities (e.g. home sizes, development envelope sizes and agricultural intensifications) trigger permits which in turn trigger public processes, rights to appeal, and better mitigation of environmental impacts. The Suggested Modifications - like the Coastal Act - are vitally important to the protection of our coast and should be embraced.

Thank you for considering the views of our membership, and for maintaining the expectations of County residents and Californians who helped pass the Coastal Act into state law.

Eddie Harris

/s/

President  
Santa Barbara Urban Creeks Council