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SANTA BARBARA CEMETERY ASSOCIATION
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30 June 2010

Santa Barbara County
Board of Supervisors
105 E. Anapamu Street, Room 407
Santa Barbara CA, 93101
Attn: Michael Allen, Chief Deputy Clerk of the Board

Re: Proposed Revisions to County Coastal LUDC

Dear Supervisors,

Our Board of Directors has recently been made aware of the California Coastal Commission's proposed modifications to the County's coastal ordinance. We, (the Santa Barbara Cemetery Association is made up of just around 1500 members), are concerned that the decision-making power of our elected Supervisors and their appointed commissions over local issues is being diminished in favor of the Coastal Commission, a regional board with appointed commissioners over whom voters have no control. We are also dismayed with the lack of public outreach conducted by the Coastal Commission. Public workshops are vital when considering changes to the Local Coastal Plan.

In addition to these broad issues, we also have serious reservations about a number of the proposed modifications such as the Amendment process. Based upon our understanding of the modifications, an appealable and discretionary Director's Amendment would be followed by yet another appealable and discretionary Coastal Development Permit that would go before the Montecito Planning Commission. Aside from the significant additional fees that would be required in order to prepare a staff report and have a public hearing, this process adds significant additional processing delays to the process and opens the door to duplicative appeals.

The Coastal Commission modifications would also prohibit all development within fifteen feet (15') of the bluff edge including fences and walkways. We are sensitive to bluff protection issues, but as all near-bluff development already requires geologic and bluff retreat analysis to establish an appropriate buffer, we are puzzled at what appears to be an arbitrary setback. The Coastal Commission staff report has not

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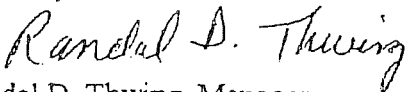
provided any evidence that the selected width is scientifically appropriate. Public discussion and good science should be mandatory on issues such as these which directly impact property rights.

The proposed modifications also eliminate certain existing exemptions on properties adjacent to the bluff including: installation of irrigation lines, structures under \$2,000 such as a garden shed, grading under 50 cubic yards and solar energy systems. Also, exemptions which currently exist for areas located over 300' from the bluff such as skylights, doors, windows and walkways will no longer be deemed exempt. Under the proposed recommendations, all of these actions will require a Coastal Development Permit with a public hearing at the Montecito Planning Commission. We strongly object to a requirement which results in a costly and months-long review process for extremely minor projects.

It appears to us that the public is by and large unaware of the existence of these wide-ranging changes to our Coastal ordinance and certainly of its implications. Any meaningful changes to the Coastal Ordinance and the Local Coastal Plan should have extensive analysis by County Staff along with significant public outreach, input and discussion.

In contrast, significant changes to our local planning ordinance have been prepared by staff of the regional Coastal Commission without any public outreach, under the guise of streamlining, and rushed through the process with minimal analysis. We urge you to ask the Coastal Commission to reconsider their staff's modifications and open the process to public discussion.

Sincerely,



Randal D. Thwing, Manager

Cc: Noel Langlo, Planning & Development