

Alexander, Jacquelyne

From: D. James <djames@forestpreservationsociety.org>
Sent: Sunday, May 13, 2018 8:26 PM
To: Williams, Das; Wolf, Janet; Hartmann, Joan; Adam, Peter; Lavagnino, Steve; sbcob
Cc: FPS Assistant; Robert Duncan; Samuel Mott; 'Monte Ward'; Andy Mills; KKimbell@aklaw.net; ranchmanager@hollisterranch.org; hroa@hollisterranch.org
Subject: Departmental Agenda, Planning Items & Public Hearings<Agenda No. 4 Gaviota Coast Plan
Plan

Importance: High

Honorable Das Williams, Chairman
SANTA BARBARA COUNTY BOARD OF SUPERVISORS
105 East Anapamu Street
Santa Barbara, CA. 93101

Re: Planning Items & Public Hearing— May 15th, 2018 Agenda Item 4 Gaviota Coast Plan CCC Amendment LCP-4-STB-0067-3

Dear Chairman Williams and Honorable Board Members:

With respect to the above referenced May 15th, 2018 scheduled hearing regarding the “Gaviota Coast Plan” and the California Coastal Commission staff’s ‘suggested’ modifications to Local Coastal Program Amendment No. LCP-4-STB-16-0067-3 (Article II certification):

We respectfully request that you continue the hearing on this matter (Agenda Item No. 4) for a period of time not less than sixty (60) calendar days, for the following reasons and upon the following grounds:

-I-

INSUFFICIENT PUBLIC NOTICE OF PROPOSED CHANGES FOR LOCAL REVIEW OF RECOMMENDATIONS—NO CONSIDERED, RATIONAL PUBLIC COMMENT POSSIBLE

The California Coastal Commission staff’s suggested modifications do not appear to have been made available for the purpose of local review or if available, any notice and request for comment is inadequate to allow timely, considered public comment on issues presented to the board. None of the CCC staff discussions were made public, and when the CCC finally released its comments (April 24th, 2018), it contained over 300 undifferentiated pages of modifications to the county’s original plan with no assessment of impacts to the public resulting from the proposed changes. That situation remains unchanged, in fact, neither the CCC nor county staff appear sufficiently well informed to discuss the affects of these changes on the general public. *But most importantly, there is no discussion as to potential impacts to private property, the taxation of which this county entirely relies upon to fund these hearings.*

-II-

WE ARE OPPOSED TO AUTHORIZING STAFF TO WITHDRAW AND RESUBMIT THE GAVIOTA COAST PLAN WITHOUT ADEQUATE PUBLIC NOTICE, REVIEW AND COMMENT

The Board of Supervisors is well aware that modifications to any plan for which a public hearing is required by statute may only be made by rehearing on the same basis, and then, and only then, by carefully identifying each plan amendment subjected to change and allowing the public sufficient time to review and comment on the proposed changes. No less a standard for public participation may be applied here than in the Board’s procedural management of the county’s general plan—in fact, the county itself has argued in its adoption of the SBCAG Strategic Plan that heightened safeguards for public participation particularly apply to local plan amendments. No such identification, notice, timely availability of documents, adequate review period and reasonable opportunity for public comment has occurred.

III

MEMBERSHIP WITHIN THE GAVIOTA COAST PLAN AREA

Forest Preservation Society of Southern California is an unincorporated association founded in 1986 and counts among its membership landowners within the area encompassed by the county general plan and the Gaviota Coast Plan. Many of these private property owners are resident within the state and county, others reside outside the state of California, all pay their county taxes.

REQUESTED ACTION. We respectfully request that; **(a)** you continue this matter on your calendar for a period of time not less than sixty (60) calendar days and, **(b)** you direct staff to prepare a technical analysis of the proposed changes and impacts to public and private property within the plan area, and **(c)** you provide a portal for electronic access to all documents and papers, not otherwise exempt, privileged or confidential, that may relate to the Gaviota Coast Plan together with all amendments and related public correspondence.

Please kindly acknowledge receipt of this email.

Respectfully submitted,

David James



FOREST PRESERVATION SOCIETY OF S.C.
P.O. Box 12054, Prescott, Arizona 86304
djames@forestpreservationsociety.org
(602) 540-5496

Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments. Thank you.
