

Alexander, Jacquelyne



#4

From: Hollister Ranch <hroa@hollisterranch.org>
Sent: Monday, May 14, 2018 1:45 PM
To: sbcob
Cc: Williams, Das; Wolf, Janet; Hartmann, Joan; Adam, Peter; Lavagnino, Steve
Subject: Departmental Item #4 – Gaviota Coast Plan, CCC Modifications
Attachments: Departmental Item #4 – Gaviota Coast Plan, CCC Modifications 5-14-18.pdf



Hollister Ranch

May 14, 2018

Santa Barbara County Board of Supervisors
105 East Anapamu Street, Fourth Floor
Santa Barbara, CA 93101
Sent by e-mail to: sbcob@co.santa-barbara.ca.us

Re: Departmental Item #4 – Gaviota Coast Plan, CCC Modifications

Dear Chairman Williams and Members of the Board:

Thank you for the opportunity to comment on the Gaviota Coast Plan modifications proposed by the Coastal Commission staff and the County's response.

We fully support the proposal to withdraw the Plan and resubmit at a later date. We do not support any of the other recommended actions at today's meeting. There has not been sufficient time for us or other stakeholders to fully review the voluminous material and react with sufficiently researched and detailed comments and recommendations. The changes proposed by the Commission staff involve substantial policy implications affecting our community and drift far from the Plan approved by your Board. The Commission staff has had well over a year since certifying your Plan submission, but we are only given a matter of days to review and comment. The report and actions proposed for today's meeting were only made available to us last Thursday afternoon.

We urge you to allow sufficient time for a complete local review and assessment before resubmitting the Plan. We believe a minimum of 60 days is needed. The withdrawal and resubmission will reset the clock for any statutory review and response deadlines and there is no need to rush to judgement on matters of such importance to our community. We also urge you to conduct sufficient outreach to re-engage stakeholders and community members, including those that were part of the more than five-year long GavPAC process. Comprehensive public participation and input is the bedrock principle upon which the Plan you submitted to the Commission was built and this is not the time to abandon that principle or betray those stakeholders and constituents in pursuit of expediency.

With regard to the extensive changes demanded by the Commission staff we believe they have exceeded their authority under the Coastal Act, which limits their review to an administrative determination of whether the Plan

conforms with the Act to the extent necessary to meet broadly stated, basic State goals. Twenty-four pages of detailed and precise amendments stray far from that standard and usurp the County's legitimate right and role to determine the precise content of its local coastal plan. In an era where the State is seeking to override local control on every level, the Board should take this appropriation of its authority seriously and defend the Plan that it submitted. As local residents, landowners, stakeholders and voters we expect you to do so on our behalf.

Because of the limited time we have had to review the specific Plan modifications from both the Commission and County staff, we are unable to provide comprehensive and detailed recommendations at this point. However, the policy areas of our concern are as follows:

- Significant expansion of Environmentally Sensitive Habitat (ESH) and ESH policies leading to unreasonable restrictions to fire protection, agricultural operations and residential use.
- Unworkable permit requirements for routine and necessary agricultural operations.
- Unreasonable and unsupported limits on Principal Permitted Use designation.
- Unreasonable and likely unlawful restriction of Accessory Dwelling Units.
- Prioritization of recreational trails over all other uses, including resource protection and agriculture.
- Off-loading by the State to the County of costs, public safety and legal liability for recreational trail acquisitions, including condemnation of private land.
- Assumption of legal liability by the County for the Hollister Ranch "in lieu" fee program.

Again, we request that you withdraw the Plan submittal to the Commission today and commit to a schedule and process that permits informed, meaningful feedback and participation before it is resubmitted. We also urge you to stand your ground with respect to your authority and responsibility to develop appropriate coastal land use policies for Santa Barbara County.

Thank you for considering our views and we look forward to working with you to forge the best outcome for the long term health and benefit of the Gaviota Coast.

Sincerely,

Monte R. Ward, President
Hollister Ranch Owners Association

Cc: Members of the Board via e-mail

Hollister Ranch Owners' Association

1000 Hollister Ranch
Gaviota, CA 93117-9757
Phone: (805) 456-7055
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hroa@hollisterranch.org

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