

COASTAL RANCHES CONSERVANCY

California Educational Nonprofit 501 (c) (3) Organization • Federal Tax ID #68-0554135

May 30, 2010

Cecilia Brown, Chair
Santa Barbara County Planning Commission
123 Anapamu Street
Santa Barbara, California 93101

David Hill
President

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Secretary

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Subject: California Coastal Commission Suggested Modifications
To the Land Use Development Code

Dear Chairperson Brown and Members of the Planning Commission,

Thank you for the opportunity to comment on the California Coastal Commission staff's suggested modifications to Santa Barbara County's Land Use Development Code.

The Coastal Ranches Conservancy is a local non-profit dedicated to the enhancement and protection of the natural environment of the Gaviota Coast by supporting research, education, restoration and conservation projects. Specifically our organization has supported steelhead restoration projects, native grass propagation, riparian protections, conservation education, and control of harmful invasive weeds on public and private lands.

Often the expense and difficulty in obtaining permits is a major obstacle to implementing beneficial environmental projects. We have been working, with the help of a grant from the Bower Foundation, to improve the process so that good environmental projects and ranching practices are encouraged.

We feel that the California Coastal Commission (CCC) staff's suggested modifications to the Santa Barbara County's Land Use Development Code (LUDC) will deter instead of encourage good natural resource protection projects and do little to preserve sustainable agriculture.

Furthermore, the CCC's proposed changes have had virtually no opportunities for public review and comment, and no time for citizens and agencies to consider, deliberate and advise. This is not the way public policy should be imposed and runs counter to the transparent and collaborative manner that the County undertook during the original adoption of the LUDC.

The CCC staff proposal will undermine the Gaviota Coast Rural Planning Update and result in prematurely determining the outcome of the GavPac--which conducts its business with open public meetings and is considering ways to contribute to agriculture's long-term viability, protect natural resources, and enhance public recreation opportunities.

Thus, these suggested modifications by the CCC staff will result in a lost opportunity to create local changes to our regulations that can enhance resource protections, create environmentally beneficial projects on private land, and streamline agricultural permit processing which are solutions your Commission has recently and successfully addressed.

Specifically, the CCC staff's suggested modifications that are a serious concern include:

- **Establishing Principle Permitted Uses.** This is a significant departure from the County's traditional approach to agricultural zoning and will result in an expanded role by CCC staff in regulating agriculture in Santa Barbara County by requiring additional permit review, significant costs and unknown delays.
- **Requiring a CDP for a change in scope or intensification of agriculture operations.** The policy is unclear and does not provide a landowner flexibility to manage their operations. It is impractical for a landowner who is able to increase their grazing operation or utilize a portion of their private property for an alternative agriculture crop to apply for a CDP.
- **Mandating a CDP for a lot line adjustment or merger.** This suggested modification will create a prohibitive regulatory environment that may result in creating little incentive for property owners who want to enter into Williamson Act Contracts. These contracts are important management tools and proven to preserve long-term agriculture.
- **Limiting a development envelop to 10,000 square feet.** Currently, property in the Williamson Act is allowed a two-acre development envelope. Clearly, there will be little incentive to enter into a Williamson Act Contract when a landowner is faced limiting their development area to less than 1/4 acre plus in addition to the extra time and processing costs associated with a CDP.

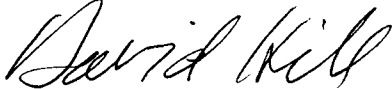
It appears that CCC staff's intent is to expand their regulatory role by mandating changes to our local coastal plan. These modifications will emasculate the GavPac

effort, waste over a year's time and squander the significant resources invested in the local process. This is an insulting attempt to undermine the locally supported general plan update that is now occurring in the Gaviota planning area. These modifications will weaken our County government's ability to determine its own coastal plan and will negatively impact long-term agriculture viability, resource protection, and public recreation.

We respectfully encourage the Planning Commission to reject the Coastal Commission staff's modifications to the LUDC.

Thank you for the opportunity to comment on these important matters.

Sincerely,

A handwritten signature in black ink that reads "David Hill". The signature is written in a cursive, flowing style.

David Hill, President

Coastal Ranches Conservancy

Cc: Supervisor Doreen Farr, Planning Director Glen Russell