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The State Bar of California  
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Santa Barbara County  
Board of Supervisors  
104 East Anapamu Street  
Santa Barbara, CA 93101

***Re: LUDC Certification before the California Coastal Commission***

Ladies and Gentlemen:

On behalf of the Gaviota Planning Advisory Committee, I am writing to express the Committee's concern regarding several of the proposed changes suggested by the staff of the Coastal Commission in connection with the pending certification of the County's LUDC by the Commission as applicable to the coastal zone.

While the Committee is just now entering its deliberative phase, it has spent several months gathering extensive information and receiving much public input as to appropriate changes in the County's land use regulations for Gaviota. It is clear that several key principles have emerged for which there is significant potential public and committee interest for incorporation into a proposed rural plan for Gaviota. While the GAVPAC has not yet deliberated the following identified principles, they are related to the items contained in the LUDC changes proposed by the CCC and are therefore listed below:

1. Streamlining the permit process for beneficial projects.
2. Protecting landowners who restore environmentally sensitive habitat ("ESH") from being prevented in the future from development in the restored area or from changing its uses to a different agricultural purpose.
3. Permitting additional uses, beyond those normally permitted, in exchange for an enhanced level of protection of a property most likely through a permanent conservation easement.

4. Enabling and encouraging the continuation of an agricultural landscape by considering policies that support farmers and ranchers, rather than imposing additional regulation. .

5. Creating a permit process that will allow for multi-generational housing and appropriate employee housing opportunities.

6. Protecting property owner entitlements while assuring a rural community characteristic.

Generally, our direction is to enable beneficial uses and projects, and several of the Coastal Commission staff recommendations will prevent or severely limit the GAVPAC's ability to implement some or all of these concepts.

In order to enable us to implement many of these key concepts, we request that you direct your staff to pursue the following specific issues with the Coastal Commission staff:

1. The Coastal Commission staff has recommended a very narrow definition of principal permitted uses "PPU" which would be eligible for an administrative permit. All other uses which may be permitted would require the highest level of review, a public hearing and would be appealable to the Coastal Commission. This level of review typically costs five to six times as much in staff time and takes three times as long to process as projects processed under an administrative permit. All beneficial or restoration projects, for example, would require this highest level of processing. In order to avoid this unintended consequence, we request that you ask for the following uses to be added to the PPU's thereby reducing the processing cost and load on the County:

- Recreational uses
- Schools
- Non-Profits with operations relating to the local land uses (e.g., agriculture)
- Equestrian uses
- Development Envelopes commensurate with that permitted under the Uniform Rules
- Multi-generational housing
- Occupancy of principal residences by any occupant that the owner may choose to allow.
- Restoration projects allowed as accessory uses to all PPU's. (These would be defined as projects enhancing the natural condition of the land with no net long term negative effect on ESHA).

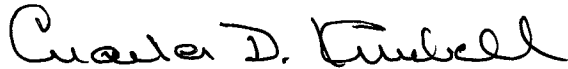
The Committee has not deliberated the subject of distinguishing principal residence sizes, so it should be noted by the Board that this topic will be debated and recommendations from the

GAVPAC regarding this issue will be forwarded to your Board. Some of the proposed changes could affect our ability to determine an appropriate policy in this regard.

2. Requiring any change of use or intensification of agriculture to go through the most burdensome permit process is directly counter to the interests strongly expressed by the public and the Committee in facilitating agriculture, not stifling it. We ask that "intensification", as proposed by the CCC staff, specifically exempt cultivated agriculture, orchards, and vineyard operations within areas which have historically been utilized for agricultural operations provided there is no direct affect on ESH or any long term negative environmental impact..

For these reasons we urge your board to work with the CCC staff in effecting the stated recommendations in this letter. The GAVPAC wishes to develop a plan that is responsive to community needs. Any progress that your Board and County staff can make towards the suggested refinements and modifications in this letter would be critically important to the efforts of the GAVPAC to produce a locally appropriate and responsive plan for the long term preservation, enhancement and viability of the Gaviota Coast..

Very truly yours,



Charles D. Kimbell,  
Chairman