

April 21, 2006

Mr. Chris Potter  
The Resources Agency of California  
1416 Ninth St., Suite 1311  
Sacramento, CA 95814

RE: Comments on Minerals Management Service's Coastal Impact Assistance Program Draft Guidelines

Dear Chris:

Santa Barbara County staff appreciates the opportunity to comment on the Coastal Impact Assistance Program Draft Guidelines. In our opinion, the NOAA's administration of the 2001 Coastal Impact Assistance Program (CIAP 2001) offers a good example to follow. Important for us, NOAA ensured: (1) timely reimbursement of reported expenditures by wire directly to the coastal political subdivisions; (2) non-burdensome reporting requirements once per year and directly to NOAA; and (3) a timely and non-burdensome process for adjusting the County's funding plan as a coastal political subdivision deems necessary to maximize the local benefits of CIAP funding.

We also offer the following comments to the Draft Guidelines of March 2006.

**Section 3.** We appreciate early publication of the allocations. Please specify what opportunities we will have to review MMS' methods to calculate the allocations to California's Coastal Political Subdivisions (CCPS), prior to publicizing the allocations.

**Section 4.** Aside from a workshop, please offer eligible recipients the opportunity to comment on the financial assistance process prior to finalizing it.

**Section 4.2.2.** We believe the proposed definition of *infrastructure*, for purposes of CIAP, is too broad. We recognize that a definition is useful to ensure compliance with Section 31(d)(3), specifying that only 23% of CIAP funds may be used for planning assistance and the administrative costs of complying with this section, and for mitigation of the impact of OCS activities through funding of onshore infrastructure project and public service needs. However, trails, roads, and parks often are associated with authorized uses of the CIAP that carry no such restrictions; i.e., (1) projects and activities for the conservation, protection, or restoration of coastal areas, including wetland; and (2) mitigation of damage to fish, wildlife, or natural resources. Consider, for example, bridge replacement (or replacing an Arizona crossing with a bridge) solely or primarily for purposes of providing steelhead access to historic upstream

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breeding waters. Trails often accompany restoration projects as a means of protection, keeping the public away from sensitive areas. Roads, particularly temporary roads, are often used in restoration. Accordingly, we ask simply that the MMS more generally define *infrastructure* more consistently with the intent of the legislation.

**Section 5.3.2.** Sub-item two under this section appears to conflict with the third paragraph of section 5.2.6, wherein the latter allows cancellation or removal of a project from the list and replacement with another project from Tier 2 without having to amend the plan. The former characterizes removal of a project as an amendment. Please reconcile.

Please contact me at (805) 568-2046 if you have further questions.

Sincerely,

Douglas K. Anthony, AICP  
Interim Deputy Director