

Honorable Board of Supervisors:

I live in Cleone directly across from the property in question, 32800 Nameless Lane, owned by Travis Swithenbank. I disagree with the CPA's ruling on April 8 and I support Dr. William Schieve's appeal for the denial of B_2017-0043. I have read attorney Colin Morrow's appeal letter and Planning & Building Services memo, authored by Mark Cliser, Planner II.

How can part of a parcel be reconveyed without first being subdivided? Mr. Cliser's memo cites Gov't Code section 66412(d) ..." A lot line adjustment between four or fewer existing adjoining parcels, where the land taken from one parcel is added to an adjoining parcel, and where a greater number of parcels originally existed is not thereby created, if the lot line adjustment is approved by the local agency or advisory agency. ..." and further in Section (d)... "No tentative map, parcel map, or final map shall be required as a condition to the approval of a lot line adjustment". Yet, in the applicant's application is a tentative map complete with four parcels, "a greater number than originally existed". This is in violation of the code.

Mr. Cliser's Chronology reveals simultaneous submittal of S_2017-0003, a subdivision application for Lot A (inland), with tentative map of 11 lots (with adjusted property lines). Separation of the BLA from the subdivision is a maneuver to ensure there would be no Coastal Zone oversight with its rigorous requirements both environmental and financial.

Codes are ripe for interpretation. Mr. Cliser states "at issue here are two properties with existing deeds of trust and no apparent plan to create new financing in an attempt to create new 'developable lots' without compliance with the Subdivision Map Act". My observation leads me to believe that they were indeed to create new developable lots.

I submit that both the BLA and the subdivision are of one intent, one project, neither existing without the other for the sole purpose to create a major subdivision on Nameless Lane.

Please approve Dr. Schieve's appeal to the Boundary Line Adjustment, case B_2017-0043.

Thank you for your consideration.

Alan Wilburn