

NATIONAL OCEANIC and ATMOSPHERIC ADMINISTRATION
APRIL 19, 2002
San Pedro

The only reason that there is open space today is due to the strength of the ranchers and farmers who kept their lands intact as long as they could, until it became economically unfeasible to operate due to the strangleholds placed by increasing government restrictions. That same economic stranglehold is part of this LUP.

The designation of ESHA is a crippling one. It is designed to remove all traces of horses from the area of the Coastal Commission's oversight. For those of us who hold horses in a prominent position within our lives, the proposed plan is a hangman's noose. Such a plan would create tremendous economic losses as our property is devaluated to non-conforming use, as people are forced to relocate to rural lands thus affecting our personal lives, our financial situations and our business and work lives.

According to a study of *The Economic Impact of the Horse Industry in the United States* done by Barents Group, LLC, the US horse industry, including recreation, showing, racing, and other segments, involves more than 7 million participants, includes nearly 2 million horse owners, supports 1.5 million full-time jobs, produces \$25 billion in goods and services, contributes \$112 billion to the gross domestic product, and pays almost \$2 billion in taxes to federal, state and local governments. California leads the nation in number of horses used in recreational riding with almost 300,000. In Malibu and the Santa Monica Mountains alone there are approximately 7,000 horses. The commercial and private boarding facilities, the breeding and training farms, and the individual homeowners altogether provide this area with a staggering economic contribution.

ESHA areas and lands adjacent to ESHAs prohibit horses. So anyone who is even adjacent to an ESHA has to move if they want to keep horses. The average person in the affected area does not have the \$50,000 to spend for consultants, reports, permits and fees, nor can they handle the aggravation and stress associated with this situation, just to file for an exception that will probably be denied.

The LUP's requirement of horse facilities to be within the irrigated fuel modification area of 50 ft conflicts with the health department's requirement that horse facilities be a least 50 ft away from any residence. This clearly leaves zero land area for horses. The small 750 sq.ft. ancillary structure requirement also eliminates horse facilities.

The economic impact of the horse industry for products and services such as riding clothes, feed stores, tack and gear stores, gas stations, automotive repairs, truck & horse trailer dealerships, restaurants, and others is very substantial in this part of the country and would be severely and negatively affected. Many would have to close their businesses. The horse industry's contribution is greater than railroad transportation, the furniture manufacturing industry, and motion picture services.

Sound scientific data has not been used in designating ESHAs. Perceived risks and emotional accusations of pollution from horses have proven to be unfounded and without merit. Horses

and cattle have been in our area for hundreds of years, crossing these creeks and standing under these oak trees.

Further, if we cannot keep our horses at home or at a facility, we are denied access to the public lands of the SMMNRA because many of us do not hike. As a 67-year old senior citizen with a foot problem, I cannot walk a distance. These public lands were bought with public funds of over \$ 200 million with the intention of horseback riders being among those using the lands.

Horses have enriched our historical and cultural heritage. Public agencies that are charged with conservation must also ensure the people's enjoyment and use of their lands. Efforts to place a higher emphasis on environmental conditions of private property result from a misguided preservation/purity bias. Congress, in fact, has specifically directed managing agencies to abandon the purity approach on federal lands (Report 95-540, July 1977). The goal should be for a balanced plan, not a lopsided approach. Surely individuals should be given the same respect for their lands as the Federal government deems for its lands. The phrase "historical recreation use" is constantly referred to in various Congressional legislation.

Good government is a government of laws, and it abides by established rules, not of personal preferences of a few. Horses have pulled the plows to feed families and they have carried the flag to celebrate our independence and freedom.

I urge this commission to assist in securing the economic and personal rights of the horse people. Thank you for the opportunity to request your assistance as a federal body.

Ruth Gerson
Recreation and Equestrian Coalition
President