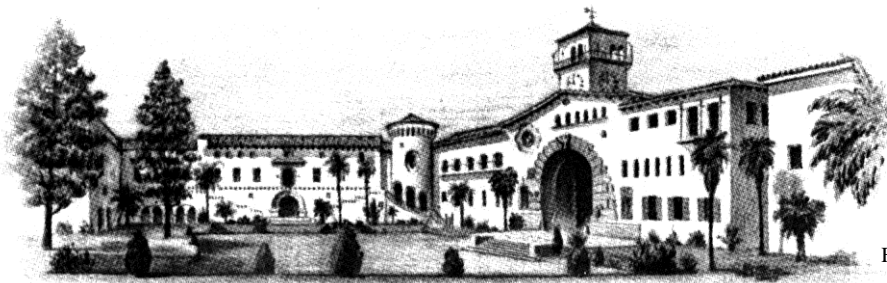


COUNTY OF SANTA BARBARA

Dennis Marshall
County Counsel



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FROM THE DESK OF KEVIN READY, SR.
SENIOR DEPUTY COUNTY COUNSEL

COUNTY COUNSEL

October 21, 2013

Amy Dutschke, Regional Director
Bureau of Indian Affairs
US Department of the Interior
2800 Cottage Way
Sacramento, CA 95825

Re: Santa Ynez Band of Chumash Indians Tribal Land Consolidation and Acquisition Plan and
Camp 4 Fee-to-Trust Application

Dear Ms. Dutschke:

We are writing in response to the October 11, 2013 letter of Chairman Vincent Armenta of the Santa Ynez Band of Chumash Indians (attached) which served to withdraw the application for approval of the tribal Land Consolidation and Acquisition Plan ("LCAP") which you approved on June 17, 2013. This withdrawal of the LCAP by the Santa Ynez Band creates a confusing contradiction given the fact that the LCAP serves as a foundational document for both the 1400 acre Camp 4 Fee-to-Trust application ("Fee-to-Trust Application") and the Environmental Assessment ("EA") thereof. We are asking that your office take affirmative steps to clarify the confusion and act to effect the withdrawal of the LCAP and the derivative application and environmental document.

Both the Fee-to-Trust Application and the EA reference and rely on the assumptions and outcome of the LCAP. The LCAP serves as the foundation and framework for the consideration of the Fee-to-Trust application. Indeed, the standards of review by your office are different for land involved in a Tribal Consolidation Area as envisioned in the LCAP as approved by your office than for non-contiguous land absent such an LCAP. Without the LCAP in place any consideration of the current EA or Fee-to-Trust Application is flawed, both jurisdictionally and factually.

Re: Santa Ynez Band of Chumash Indians Tribal Land Consolidation and Acquisition Plan and
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In light of the withdrawal of their LCAP by the Santa Ynez Band, we ask that your office immediately act:

1. To withdraw your approval of the LCAP in accordance with the intent of withdrawal thereof by the Santa Ynez Band; and
2. To return both the EA and the Fee-to-Trust Application for modification in light of withdrawal; and
3. To confirm that any future LCAP application will be given full notice to interested parties with opportunity to comment thereon.

Should your office determine that you no longer have jurisdiction to act on withdrawal of the LCAP due to the pending appeal thereof, we ask that you request the matter to be remanded by the Interior Board of Indian Appeals to your office for appropriate action.

We look forward to your clarification of the situation involving the LCAP at the earliest opportunity.

Sincerely,
DENNIS MARSHAL
COUNTY COUNSEL

Kevin E. Ready, Sr.
Senior Deputy

Cc: Kevin Washburn, Assistant Secretary for Indian Affairs, Washington, DC
Chairman Vincent Armenta, Santa Ynez Band of Chumash Indians
Interior Board of Indian Appeals, Washington, DC
IBIA Case Service List