

Rezone

Sarah Mayer *Public Comment - SB Audubon Society*

From: katherine.emery@lifesci.ucsb.edu
Sent: Tuesday, April 23, 2024 10:44 AM
To: Das Williams; Laura Capps; Joan Hartmann; Supervisor Nelson; Steve Lavagnino; sbcob
Subject: Santa Barbara Audubon Society Comments on Final Program Environmental Impact Report for the 2023-2031 Housing Element Update
Attachments: 2024-04-23 SBAS letter to BoS re housing element 2024-05-03 D2.pdf

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Dear Chair Lavagnino and Honorable Members of the Board of Supervisors:

Santa Barbara Audubon Society (SBAS) is a chapter of the National Audubon Society. SBAS has about 1100 members in the Santa Barbara area. The mission of SBAS is to protect area birdlife and habitat and connect people with birds through education, conservation, and science.

On March 19, 2024, the County released the Final Program Environmental Impact Report (EIR) for the 2023-2031 HEU. The Final Program EIR analyzes the potential impacts associated with the implementation of the HEU's goals, policies, and programs, including the potential rezone program. SBAS urges the County to make improvements to the Housing Element Update.

Please see and confirm receipt of the attached letter. Thank you.

Sincerely,

Katherine

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Katherine Emery, Ph.D.
Executive Director
Santa Barbara Audubon Society
SantaBarbaraAudubon.org

**** We invite you to watch our short outreach films [Birds of Lake Los Carneros](#), [Why are birds important?](#), and [How to start birding](#). These beautiful films by Sage Hill Films teach about birds, birding, and important local habitats. **Please join SBAS in protecting birds.******



April 23, 2024

Board of Supervisors
Santa Barbara County
105 E. Anapamu Street
Santa Barbara, CA 93101

Re: Comments on Final Program Environmental Impact Report (EIR) for the 2023-2031
Housing Element Update (HEU)

Dear Chair Lavagnino and Honorable Members of the Board of Supervisors:

Santa Barbara Audubon Society (SBAS) is a chapter of the National Audubon Society. SBAS has about 1100 members in the Santa Barbara area. The mission of SBAS is to protect area birdlife and habitat and connect people with birds through education, conservation, and science.

On March 19, 2024, the County released the Final Program Environmental Impact Report (EIR) for the 2023-2031 HEU. The Final Program EIR analyzes the potential impacts associated with the implementation of the HEU's goals, policies, and programs, including the potential rezone program. In this letter, SBAS urges the County to make improvements to the HEU.

Our biggest concern is the proposed development of Glen Annie Golf Course (GAGC). The County should not re-zone the GAGC and should eliminate the GAGC property from the housing element. The County should instead find infill development elsewhere, inside the Urban Limit Line. Expansion of residential development outside of the Urban Limit Line is unacceptable.

The EIR, Chapter 4, Alternatives, considers alternatives to the Proposed Project. Both Alternative 2 – Sustainable Communities Strategy and Alternative 4 – Reduced Project B, would remove Rezone Site No. 11 (Glen Annie) from consideration for potential rezoning. **We urge the County to select either Alternative 2 or Alternative 4.**

The Proposed Project is inconsistent with the County Comprehensive Plan – Land Use Element, whose policy states, “No urban development shall be permitted beyond boundaries of land designated for urban uses except in neighborhoods in rural areas. The analysis in the FEIR states, “Rezone Site No. 11 (Glen Annie) is located in the Rural Area and would transform a golf course surrounded by natural areas and agricultural uses into an urban residential neighborhood with up to 40 du/ac and up to four or more stories. Development of this site along with other sites in the Rural area would require an expansion of the Urban Area boundary.” **SBAS urges the County not to expand the Urban Limit Line. Doing so would be sprawl-inducing and would ruin the character of rural Goleta.**

The Proposed Project is inconsistent with the County Comprehensive Plan – Agricultural Element. From the EIR, “The proposed Project also could result in the rezoning of rural agricultural areas to housing, as exemplified by Rezone Site No.11 (Glen Annie), which is zoned AG-II-40 and located north of the City of Goleta.” “If selected, conversion of this site may be inconsistent with this policy if infill development in the Urban Area is available.” Rezoning GAGC for high density housing pushes the urban limit line further up into the foothills, but without municipal services and far from personal services and amenities.

Impact AV-2 states, “Rezone Site No. 11 (Glen Annie) is located in the Rural Area and would transform a golf course surrounded by natural areas and agricultural uses into a residential neighborhood with up to 40 du/ac and four stories or more, which would be highly visible from public vistas in the foothills and local public roads, such as Glen Annie and Foothill Road. This development would dramatically change the visual character of the site and the surrounding area, which is set at the base of the Santa Ynez Mountains, comprising foothill orchards and undeveloped hillsides and ridgelines.” This impact to the citizens of the City of Goleta is highly undesirable.

SBAS is very concerned about the impact of the project on wildlife. Impact BIO-3 states, “The proposed Project could interfere substantially with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. The development of housing sites that are currently undeveloped could interfere substantially with native fish and wildlife movement due to habitat fragmentation and the creation of barriers to wildlife movement (e.g., fences or walls). Wildlife corridors within or adjacent to potential future development enabled under the proposed Project, such as creeks and riparian corridors, open native habitats, and water bodies could be disrupted or blocked by future residential development. For example, ... in the Goleta foothills, similar impacts could occur along Glen Annie Canyon and Tecolotito Creek with the development of Rezone Site No. 11 (Glen Annie).” This is yet another reason that Glen Annie should be removed from the plan.

The golf course currently acts as a buffer from wildland fires for the City of Goleta. The proposed project at Glen Annie would create a significant wildland fire risk. The golf course is also currently available as a staging area for the fire department during a wildfire, if needed. These benefits would vanish if the golf course is developed.

The golf course property may also include ESHA and endangered Red-legged frog habitat. Any development there could be precluded by environmental considerations. Litigation would be sure to occur.

While SBAS’s concerns with the re-zoning of GAGC are primarily its effects on wildlife and habitat loss, we also have concerns about quality-of-life issues:

The County is proposing to rezone primarily agricultural lands and open space, almost all of it in the Eastern Goleta Valley. Most of the rezones are planned for the Eastern Goleta Valley and City of Goleta planning areas. Thousands of new units are proposed within a one-mile radius along Hollister in the Eastern Goleta Valley. Rezoning of prime and unique farmlands should be

the last resort and should not be limited to the Goleta and Eastern Goleta Valley planning areas. Instead, the County should encourage infill zoning and spread the burden throughout the South Coast, including Montecito and Hope Ranch. In the proposed plan, the County has opted not to pursue infill development but instead to focus on putting housing in large undeveloped open spaces. Choosing to develop agricultural lands and open spaces on the outskirts of a city is called sprawl. It is the model used to develop Los Angeles and Orange Counties. We have seen how that turned out. We don't want Santa Barbara County to be the same!

The County should consider the impacts of their proposed actions on local neighborhoods and the environment. The proposal to rezone GAGC with over 1000 units would add about 7% more housing units to an area adjacent to the City of Goleta, essentially an entire new school district, in one narrow limited area. It is an area near several schools, including Dos Pueblos High School, across the street from GAGC, and nearby Brandon School. Traffic in the area would greatly increase and children going to and from school would be endangered.

The proximity of the new housing to the high school especially would make the intersection of Cathedral Oaks and Glen Annie a dangerous and congested site, especially in the mornings and afternoons when many inexperienced drivers are driving into the intersection. It would also make the already heavily congested freeway offramp at Glen Annie unusable and extremely unsafe. Even now, traffic frequently backs up on the Glen Annie/Storke Road offramp onto northbound lanes of the 101 freeway. Having cars stopped in freeway lanes is obviously extremely dangerous. Developing GAGC would exacerbate this hazardous situation.

Developing GAGC would transform the area, requiring that Cathedral Oaks Road become a multi-lane road, more like Hollister Avenue. Traffic equal to the equivalent of all of Old Town would have to pass through one road - Glen Annie. Or additional agricultural land would have to be converted into larger roads (Glen Annie, Cathedral Oaks, Los Carneros) to handle the traffic.

We understand that County staff are proposing to add a new exemption from roadway and intersection standards for specified housing sites. The County's circulation element would be changed to add language stating that, "However, a project shall not be required to fully offset its impacts if doing so would render the project infeasible or require a reduction in density. If roadway and intersection improvements required to meet LOS standards and fully offset its impacts are infeasible [such as because they were too expensive], the project shall be required to implement roadway and intersection improvements to address LOS acceptable to the Public Works Department." **We oppose changing the County circulation element to bypass or undermine the measurement and mitigation of traffic impacts from any development.**

In 2009, the LAFCO staff supported the City of Goleta's proposed sphere of influence proposal for the golf course. The staff stated, "Staff believes that the Glen Annie golf course fits the criteria for inclusion in a Sphere for Goleta. All of the traffic associated with the golf course and facilities must travel through the City. Delivery vehicles, customers, employees, etc. must traverse City streets; all the while the City receives no taxable revenue or land-use oversight. Taking such an example one step further, if the golf course were to seek a change in land use or were to alter their facility, the City would experience the impacts of that change but would have

no say or control over the application. Neither would the City realize any of the benefits that might be associated with a more intense land use.”

We hope that the Board of Supervisors will seriously consider SBAS’s comments. Please **eliminate the re-zone of the Glen Annie Golf Course property from the County Housing Element Update.**

Sincerely,

A handwritten signature in cursive script that reads "Katherine Emery".

Katherine Emery, Ph.D.
Executive Director
Santa Barbara Audubon Society