



February 14, 2011
Santa Barbara County Board of Supervisors
Santa Barbara County Planning and Development Department
123 E. Anapamu Street
Santa Barbara, CA 93101

Re: Eastern Goleta Valley Community Plan Update

Honorable Board of Supervisors:

This letter summarizes the Open Space Preservation Network (OPEN) and Environmental Defense Center's (EDC) comments regarding the Eastern Goleta Valley Community Plan Update. EDC protects and enhances the environment through education, advocacy and legal action. EDC participated in the 1993 GCP drafting and adoption process and continues to actively participate in various land use planning and natural resource protection issues involving the County's Goleta Planning Area. There are specific changes that EDC and OPEN recommend be made prior to the initiation of environmental review for the Plan update. We would like to take this opportunity to focus your attention on the following items: 1) Suggested revisions to agricultural conversion language and related findings, 2) A request to remove the Caird triangle property from consideration for a rezone, and 3) Support for the Planning Commission's recommendation NOT to include the San Marcos Growers site for potential conversion.

- 1. Policies currently recommended in the Plan do not adequately address potential conversion of agricultural lands.** EDC participated in the numerous GVPAC and Planning Commission meetings during which time several iterations of this language were considered. However, there are still numerous deficiencies in the proposed language forwarded to your Board. The most egregious omission is the lack of specific findings prior to any agricultural land conversions. Thus, we have provided your Board with suggested language for consideration, below. As you will note, the phrase "to the greatest extent feasible" was removed throughout the suggested policy language. Additionally, this language combines the strongest protection criteria available and melds it with some of the language that was recommended to your Board by the Planning Commission and the GVPAC in its initiation of the Plan. Our suggested language follows (with deletions/additions noted in the track changes mode-note, numbering follows that contained in the PC Resolution to your Board):

17. Policy LUA-EGV-1.1: The County shall maintain land use and development patterns that sustain and support agricultural land uses, agricultural operations, and distinctive urban and rural agricultural characteristics.

18. Policy LUA-EGV-1.5: Urban Agricultural Land Uses: Land designated for agricultural land use within the urban area shall be preserved for urban agricultural uses, unless the County makes findings that:

- a. Smaller, more isolated parcels with greater urban/agricultural conflicts are considered first prior to larger blocks of agricultural land for potential conversion;
- b. There is an overriding public need for conversion to other uses for which there is no other land available in the Goleta urban area; and
- c. The land is no longer appropriate for agriculture.

19. Policy LUA-EGV-1.6: Urban Agricultural Land Use Conversion:, Before any general plan amendment and/or rezone proposal in the urban area is considered for a change of land use designation from agricultural to non-agricultural, the following items shall be addressed:

a. Evaluate and document factually and substantively the quality and extent of agricultural resources onsite, adjacent to the property, and within the urban area, including, but not limited to, prime agricultural land, land in existing agricultural use, lands with prime soils, grazing land, land with agricultural potential, and lands under Williamson Act contracts, to determine its historic, current, and future potential to retain agricultural uses on site. If the analysis determines the agricultural use can be retained, conversion shall be avoided unless findings in Policy LUA-EGV-1.5 are made.

In addition to the above findings, changes to agricultural land use designations shall only be approved if:

- b. Proposed land uses are consistent with all policies of this Plan, and compatible with neighboring land uses—whether agricultural or non-agricultural,
- c. The GPA avoids partitioning or interrupting contiguous blocks of agriculturally-designated lands,
- d. The GPA preserves and enhances environmental resources, including, but not limited to coastal bluff geology, habitat areas, visual resources, watershed resources, and community characteristics, particularly with regard to agricultural heritage and natural environmental resources.
- e. The GPA includes provisions for the community's social, economic and cultural well-being, and health and safety, such as public parks, open spaces, trails, habitat protection or restoration, and/or community gardens,
- f. The GPA dedicates public open space for habitat preservation and/or public recreation and indicate the amount and extent,
- g. The GPA provides public access (coastal if applicable), parking, recreational trails, bike paths, and/or pedestrian routes, and
- h. The GPA confines and clusters non-agricultural development adjacent to existing developed areas and transportation facilities to maximize preservation of open space, with the exception of passive public recreation improvements such as trails, signs and park facilities.

With the incorporation of this language, the intent set forth in the Plan that discourages unnecessary conversion of agricultural land to other uses would be supported.

2. The South Patterson Triangle should not be considered as part of the potential rezones. It is unclear why this piece of agricultural land is still under consideration for a rezone, given the fact that other properties are available to meet Housing Element requirements for affordable housing site consideration. The

community and the GVPAC have clearly spoken out against rezoning agricultural land and this should not be included, as the MTD and other properties are sufficient to meet requirements. EDC and OPEN urge you to recommend continuation of the appropriate agricultural zoning for the "triangle" parcel located near South Patterson adjacent to Maria Ygnacio Creek and Atascadero Creek. This parcel is vitally important to our community - not only for local agriculture - but also as a creek buffer. Existing GCP Policy LUA-GV-5 supports retaining the agricultural zoning on the triangle parcel: "In the County's long-range planning efforts, the maintenance of agricultural and/or recreation uses should be protected along Atascadero and Maria Ygnacio Creeks to serve as a buffer between the creeks and adjacent commercial, industrial, and residential uses."

Proposed Policy LUA-EGV-1.3 also supports retaining the triangle parcel in agriculture: "Atascadero and Maria Ygnacio Creeks shall be maintained appropriately to serve as buffers between agricultural areas, recreational uses and adjacent commercial, industrial and residential uses."

These creeks support endangered Southern California Steelhead, endangered Tidewater Gobies, state species of concern Western Pond Turtles, and a host of rare and common wildlife and bird species. Moreover, these creeks flow directly into the Goleta Slough, an important ecological reserve. The triangle parcel helps protect the Slough, and the fish and wildlife therein, and safeguards our water from urban pollution. Rezoning this parcel would make it a new source of polluted urban runoff - instead of a buffer against pollution. If the County must provide increased housing, it should do so through redevelopment where possible, and should avoid rezoning areas that are precious to our community in terms of farmland and watersheds.

3. Please uphold the Planning Commission's recommendation NOT to include the San Marcos Growers site for a rezone. Last November, the County Planning Commission finished seven intensive meetings to deliberate the draft Goleta Valley Community Plan (GVP) and finalize its official recommendations to the County Board of Supervisors. These recommendations included a number of changes to the draft Plan that were not what the Goleta Valley Planning Advisory Committee (GVPAC) had originally approved in their initiative draft to the Planning Commission. The Planning Commission's changes fine-tuned the Plan and addressed the need to establish a range of sites for affordable high-density housing opportunities to be studied as part of the environmental review for the Plan update. Currently, the State is requiring that 20-30 acres are considered for rezoning for high density housing *within the entire County*. Thus, the GVP environmental review will consider rezoning approximately 28 acres for this County-wide need, in accordance with the Planning Commission's recommendations. It is important that your Board recognize that the requirements of Housing Element Policy 1.3 have instigated major revisions to the GVPAC's recommendations for the Plan. However, the 28 acres proposed to be studied for a potential rezone to meet the requirements of this policy do NOT currently include the San Marcos Growers site on Hollister Avenue. Nor do they require the consideration of the Caird property referenced above, which is not currently proposed for high-density housing as part of the Planning Commission's recommendation to your Board. We understand there are factions of the community who will be attempting to sway your Board to consider this site for a high-density housing rezone as part of the GVP Update. Please uphold the Planning Commission's recommendation to your Board NOT to recommend the San Marcos Growers site for consideration of a rezone.

Conclusion:

To recap our suggested changes:

- Please revise the agricultural conversion language and associated findings to better protect our agricultural land in the Eastern Goleta Valley from piecemeal conversion;
- Please remove the Caird triangle property from consideration for a rezone; and
- Please uphold the Planning Commission, GVPAC and the public's support for NOT including the San Marcos Grower's site as a potential affordable housing site for this Plan.

We sincerely appreciate your Board's consideration of the above comments, and look forward to your deliberations.

Best Regards,

Via e-mail

Christina McGinnis