



COUNTY OF SANTA BARBARA

Planning and Development

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Appeal to the Board of Supervisors or Planning Commission (County of Montecito)

2017 JUN -9 AM 11:15
COUNTY OF SANTA BARBARA
CLERK OF THE BOARD OF SUPERVISORS

APPEAL TO THE BOARD OF SUPERVISORS OR PLANNING COMMISSION (APL) on the issuance, revocation, or modification of:

- All Discretionary projects heard by one of the Planning Commissions
- Board of Architectural Review decisions
- Coastal Development Permit decisions
- Land Use Permit decisions
- Planning & Development Director's decisions
- Zoning Administrator's decisions

THIS PACKAGE CONTAINS _____

- ✓ APPLICATION FORM
- ✓ SUBMITTAL REQUIREMENTS

AND, IF ✓'D, ALSO CONTAINS _____

South County Office 123 E. Anapamu Street Santa Barbara, CA 93101 Phone: (805) 568-2000 Fax: (805) 568-2030	Energy Division 123 E. Anapamu Street Santa Barbara, CA 93101 Phone: (805) 568-2000 Fax: (805) 568-2030	North County Office 624 W. Foster Road, Suite C Santa Maria, CA 93455 Phone: (805) 934-6250 Fax: (805) 934-6258	Clerk of the Board 105 E. Anapamu Street Santa Barbara, CA 93101 Phone: (805) 568-2240 Fax: (805) 568-2249
Website: www.sbcountyplanning.org			

SUBMITTAL REQUIREMENTS

- X 8 Copies of the attached application.
- X 8 Copies of a written explanation of the appeal including:
- If you are not the applicant, an explanation of how you are an “**aggrieved party**” (“Any person who in person, or through a representative, appeared at a public hearing in connection with the decision or action appealed, or who, by the other nature of his concerns or who for good cause was unable to do either.”);
 - A clear, complete and concise statement of the **reasons or grounds for appeal**:
 - Why the decision or determination is consistent with the provisions and purposes of the County’s Zoning Ordinances or other applicable law; or
 - There was error or abuse of discretion;
 - The decision is not supported by the evidence presented for consideration;
 - There was a lack of a fair and impartial hearing; or
 - There is significant new evidence relevant to the decision which could not have been presented at the time the decision was made.
- X 1 Check payable to County of Santa Barbara.

✓
✓ Note: There are additional requirements for certain appeals including:

- a. **Appeals regarding a previously approved discretionary permit**— If the approval of a Land use permit required by a previously approved discretionary permit is appealed, the applicant shall identify: 1) How the Land Use Permit is inconsistent with the previously approved discretionary permit; 2) How the discretionary permit’s conditions of approval that are required to be completed prior to the approval of a Land Use Permit have not been completed; 3) How the approval is inconsistent with Section 35.106 (Noticing).
- b. **Appeals regarding Residential Second Units (RSUs)** — The grounds for an appeal of the approval of a Land Use Permit for a RSU in compliance with Section 35.42.230 (Residential Second Units) shall be limited to whether the approved project is in compliance with development standards for RSUs provided in Section 35.42.230.F (Development Standards).



PLANNING & DEVELOPMENT APPEAL FORM

SITE ADDRESS: Intersection of Alisos Canyon and Foxen Canyon Roads;

ASSESSOR PARCEL NUMBER: 133-080-036, 037, 026

Are there previous permits/applications? ☒ yes numbers: _____
(include permit# & lot # if tract)

Are there previous environmental (CEQA) documents? ☐ no ☒ yes numbers: Draft MND

1. **Appellant:** Rancho La Laguna LLC, La Laguna Ranch Company LLC

Phone: 805-882-1405 FAX 805-965-4333

Mailing Address c/o Susan F. Petrovich, P.O. Drawer 720, Santa Barbara, CA 93102
E-mail: spetrovich@bhfs.com

2. **Owner:** Same as Appellant

Phone: _____ FAX: _____

Mailing Address: _____ E-mail: _____
Street City State Zip

3. **Agent:** Susan F. Petrovich Phone: 805-882-1405 FAX: 805-965-4333

Mailing Address c/o Susan F. Petrovich, P.O. Drawer 720, Santa Barbara, CA 93102
E-mail: spetrovich@bhfs.com

4. **Attorney:** Same as Agent Phone: _____ FAX: _____

Mailing Address: _____ E-mail _____
Street City State Zip

2017 JUN -9 AM 11:16
COUNTY OF SANTA BARBARA
CLERK OF THE
BOARD OF SUPERVISORS

COUNTY USE ONLY

Case Number: _____	Companion Case Number: _____
Supervisorial District: _____	Submittal Date: _____
Applicable Zoning Ordinance: _____	Receipt Number: _____
Project Planner: _____	Accepted for Processing: _____
Zoning Designation: _____	Comp. Plan Designation: _____

COUNTY OF SANTA BARBARA APPEAL TO THE:

☒ BOARD OF SUPERVISORS

_____ PLANNING COMMISSION: _____ COUNTY _____ MONTECITO

RE: Project Title Rancho La Laguna Tract Map and State Small Water System

Case No.06TRM-00000-00002; TM 14,709; 16 CUP-00000-00030

Date of Action 5/31/2017

I hereby appeal the _____ approval _____ approval w/conditions _____ denial of the:

_____ Board of Architectural Review – Which Board? _____ COUNTY

_____ Coastal Development Permit decision

_____ Land Use Permit decision

☒ _____ Planning Commission decision – Which Commission? County

_____ Planning & Development Director decision

_____ Zoning Administrator decision

Is the appellant the applicant or an aggrieved party?

☒ _____ Applicant

_____ Aggrieved party – if you are not the applicant, provide an explanation of how you are and “aggrieved party” as defined on page two of this appeal form:

Reason of grounds for the appeal – Write the reason for the appeal below or submit 8 copies of your appeal letter that addresses the appeal requirements listed on page two of this appeal form:

- A clear, complete and concise statement of the reasons why the decision or determination is inconsistent with the provisions and purposes of the County's Zoning Ordinances or other applicable law; and
- Grounds shall be specifically stated if it is claimed that there was error or abuse of discretion, or lack of a fair and impartial hearing, or that the decision is not supported by the evidence presented for consideration, or that there is significant new evidence relevant to the decision which could not have been presented at the time the decision was made.

SEE ATTACHED _____

Specific conditions imposed which I wish to appeal are (if applicable):

- a. _____
- b. _____
- c. _____
- d. _____

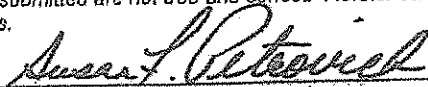
Please include any other information you feel is relevant to this application.

Please include any other information you feel is relevant to this application.

CERTIFICATION OF ACCURACY AND COMPLETENESS Signatures must be completed for each line. If one or more of the parties are the same, please re-sign the applicable line.

Applicant's signature authorizes County staff to enter the property described above for the purposes of inspection.
I hereby declare under penalty of perjury that the information contained in this application and all attached materials are correct, true and complete. I acknowledge and agree that the County of Santa Barbara is relying on the accuracy of this information and my representations in order to process this application and that any permits issued by the County may be rescinded if it is determined that the information and materials submitted are not true and correct. I further acknowledge that I may be liable for any costs associated with rescission of such permits.

Susan F. Petrovich



6/8/2017

Print name and sign - Firm

Date

Susan F. Petrovich



6/8/2017

Print name and sign - Preparer of this form

Date

Rancho La Laguna LLC

Print name and sign - Applicant



LEO A. HANLEY

6/8/17

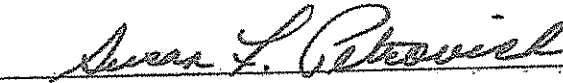
Date

La Laguna Ranch Company LLC

Print name and sign - Applicant

Date

Susan F. Petrovich



6/8/2017

Print name and sign - Agent

Rancho La Laguna LLC

Print name and sign - Landowner

Date



LEO A. HANLEY

6/8/17

Print name and sign - Landowner

Date

ATTACHMENT TO APPEAL FROM PLANNING COMMISSION DENIAL RANCHO LA LAGUNA TRACT MAP & STATE SMALL WATER SYSTEM

Appellants and Applicants Rancho La Laguna LLC and La Laguna Ranch Co. LLC base this appeal upon the following information. Appellants contend that the Planning Commission denial of the Project was arbitrary, capricious, and abuse of discretion, contrary to County policies and zoning ordinances, and not based upon the evidence in the administrative record for the Project. Furthermore, the findings for denial are without substance, lack evidentiary support and are based, in part, upon misstatement of the Agricultural Element of the Comprehensive Plan.

The original staff report for the Rancho La Laguna Project (Project) recommended approval of the Project and included suggested findings upon which the approval should be based. Those findings are sound and reflect the provisions of the Zoning Ordinance and the Comprehensive Plan that apply to the Project. Below, we compare and contrast the original staff-recommended findings with the revised findings prepared in a futile attempt to try to support denial of the project.

A copy of the original staff-proposed findings in support of project approval is attached to this appeal. These findings match the evidence. The findings adopted for denial do not. We also attach the findings for denial.

There Is No Evidence In The Record To Support Speculation And Contentions Regarding Potential Project Impacts On Agricultural Viability.

Without stating any evidentiary, zoning, or Comprehensive Plan basis, the three (3) Commissioners who voted for denial engaged in a wide range of speculation as to agricultural viability, the future of agricultural operations on the property following subdivision, and conflicts between owner residences (that ultimately would be built on the proposed parcels after subdivision) and agricultural operations. This was despite extensive, undisputed evidence in the record that all of the proposed parcels would be agriculturally viable. At least one Commissioner based his decision, in part, upon the fact that no one could guaranty that the parcels would remain in agricultural production following the subdivision. No one can guaranty that any parcel will remain in agricultural production in perpetuity, including the existing parcel. No such guaranty has been required in the County for other agricultural land divisions and the test is not included in any County ordinance or in the Comprehensive Plan.

The record reveals that the Agricultural Preserve Advisory Committee (APAC) concluded that all proposed parcels would be eligible for Williamson Act contracts. A copy of the minutes of the APAC meeting of October 3, 2008, when the committee unanimously determined the Tract Map to be consistent with the County's Agricultural Preserve Uniform Rules, is attached. As stated in the Uniform Rules (P. 4), "[T]he APAC is responsible for monitoring and enforcement of the Agricultural Preserve Program. When an application for a permit (or other County entitlement) involves land in

a Williamson Act contract, the APAC has the responsibility to review the application to determine its consistency with the County's Uniform Rules."

Also in the record is the Final Environmental Impact Report (FEIR) for the Project (16-EIR-1), which concluded that the Project: (a) had no Class 1 (Significant and Unavoidable) environmental impacts on any resources, including agricultural, biological, and cultural; and, (b) that all impacts could be mitigated with incorporation into the conditions of the mitigation measures listed in the FEIR (which mitigation measures were incorporated into the project conditions); and, (c) that the impact of the Project on agricultural resources was Class 3 (Less than Significant). The agricultural impacts discussed in the FEIR comprised the following categories:

a. Impact AG-1 – direct conversion of prime agricultural land to non-agricultural use by providing building sites for the 13 proposed parcels. "However, the Project would not significantly impair the long-term agricultural suitability and productivity of the site, based on application of the County's adopted weighted points system and other site-specific considerations." (FEIR, p. 4.2-17) After publication of the FEIR, the Applicants further reduced this impact by committing to enroll lots 9 through 13 (the 5 largest parcels) in Williamson Act contracts following map recordation. Because the Uniform Rules restrict the owner's residential site to a maximum of two (2) contiguous acres, this commitment would result in a reduction of land that could be converted from agricultural production to residential building site by a total of 5.2 acres. For lots 1 through 8, the Applicants offered to agree to no building site being more than 5 acres in size. This further reduced the total potential acres of conversion by 24.3 acres.¹

b. Impact AG-2 – potential for conversion of unique or locally important farmland, but none of the proposed RDEs would include this farmland so this impact would not occur. (FEIR, p. 4.2-27)

c. Impact AG-3 – potential conflict between onsite agricultural land uses and proposed residential uses, which may indirectly impair agricultural operations and productivity. The FEIR concluded that this was a Class 3 impact because an owner of any of these parcels would be moving into an active agricultural operation and aware of the agricultural activities. (FEIR, pp. 4.2-28) The FEIR also notes that the California "Right to Farm Real Estate Disclosure Notice" requires that land sellers and agents disclose to the buyer in advance of the sale information as to a parcel's proximity to Important Farmland, which this is. The notice advises

¹ The Residential Development Envelopes (RDEs) were created to restrict non-agricultural development to a specific area on each lot, both to avoid the placement of non-agricultural structures on land that otherwise could be devoted to agriculture, which could impact both habitat and agricultural resources, and to provide a fixed envelope that could be studied for other potential environmental impacts, particularly impacts to biological and cultural resources.

potential buyers of the potential presence of noise, dust, odors, pesticide application, etc. arising from farming operations. (FEIR, p. 4.2-29) The FEIR also states that the "application of agricultural chemicals is strictly regulated by the County Agricultural Commissioner's Office. The oversight and regulation of their use provided by this agency would minimize any potential for pesticide drift or inadvertent exposure." (FEIR, p.30)

The FEIR also includes Table 4.2-8, attached hereto, that analyzes the Project's consistency with agricultural policies in the Comprehensive Plan Agricultural Element and Land Use Element and concludes that the Project is consistent with all of those policies.

Also included in the record is the attached report from Sage Associates, including updates to the original report as Orrin Sage conducted additional site visits due to on-going development of farm fields. Orrin Sage is a highly regarded, independent environmental consultant who specializes in agricultural analyses. He has an academic background in geology, soils, and natural resource management (and a Ph.D. in geology), but with his family ranching background and his own ranch management experience, he soon focused on agriculture, offering professional capabilities for agricultural suitability and viability studies, grazing plans, restoration plans, interim ranch management. He is professionally registered by the California Board of Forestry as Certified Rangeland Manager #64; and by the American Registry of Certified Professionals in Agronomy, Crops, and Soils as Soil Erosion and Sedimentation Control Specialist #692; and is also a member of the Society for Range Management.

Suffice it to say that, more than anyone else involved in this project, Orrin Sage has far more expertise in analyzing Rancho La Laguna's agricultural viability and in applying the County of Santa Barbara's Environmental Thresholds analysis for agricultural viability.

Orrin Sage's analysis of the agricultural viability of the proposed parcels², using the County's Environmental Thresholds test, resulted in a finding that all of the proposed parcels well exceeded the 60 points needed to determine that an agricultural parcel was viable:

Lot 1 – 76.0	Lot 8 – 75.2
Lot 2 – 76.5	Lot 9 – 67.5
Lot 3 – 74.8	Lot 10 – 70.2
Lot 4 – 76.7	Lot 11 – 70.5
Lot 5 – 76.0	Lot 12 – 72.2
Lot 6 – 73.7	Lot 13 – 66.6

² The figures that follow do not necessarily match the points in Sage's initial assessment. He returned to the Ranch more than once to verify the degree of agricultural production, including checking on the crops in some relatively new farm fields to ensure that they were thriving. The result of those follow-up site visits was an increase in points for proposed lots. The Sage report is included in the Final Environmental Impact Report Appendices.

Lot 7 – 76.1

The APAC agreed that the proposed parcels individually are agriculturally viable. They had to reach that conclusion in order to find the project consistent with the Williamson Act. See the attached minutes of the October 3, 2008 minutes when the APAC made that determination.

The County staff prepared and published a Draft Mitigated Negative Declaration for the project, which document included a detailed analysis of the agricultural viability of the proposed parcels. The staff analysis concluded that the proposed parcels each would be agriculturally viable. A copy of that analysis is attached.

The AG-II-100 zoning for the Project site allows for parcels to be divided into parcels that are as small as 100 acres. Other County requirements for such a land division require that any agricultural land division result in all resulting parcels being agriculturally viable as stand-alone units.

The Agricultural Element also addresses, in its background text, the issue of land divisions in agricultural land. While the Agricultural Element expresses concern about a potential threat to agriculture in the County from land divisions, it makes it very clear that land divisions that result in parcels that are all agriculturally viable is not the threat of which they speak – it is the land divisions that result in small parcels that are not agriculturally viable – “With many agricultural land divisions, although the land is not being converted to urban uses, it is broken up into pieces that are too small to be economically viable agricultural units. Once the economic viability of the land is lost, there is inherently increased pressure for further division of the property and ultimate conversion of the agricultural land to urban uses.” (Agricultural Element, P. 26)

The key to the Agricultural Element language is the enormous difference between, on the one hand, an agricultural land division that retains agricultural viability in each resulting parcel and, on the other hand, an agricultural land division that results in one or more parcels that are too small to be agriculturally viable as stand-alone units. The latter type of parcels may be nothing more than large house sites. For example, 5 or 10-acre ranchettes or 25-acre grazing parcels.

For the Rancho La Laguna project, the overwhelming evidence in the record demonstrates that the proposed parcels all have individual agricultural viability, most particularly the 160+ acre parcels with large, producing farm fields and modest RDEs.

The Planning Commission Spent Little Time Discussing the Findings, Focusing on their Individual Feelings and Fears

Because the Commissioners didn't discuss the findings for denial, or the evidence supporting same, we summarize below the findings that actually supported their decision to deny this project, taken from Commissioner statements on the record.

None of these findings is supported by substantial evidence in the administrative record or by adopted County policies. Our response to these statements is inserted below each statement in italics.

1. Can't support dividing large agricultural parcels, especially those that are remote and surrounded by parcels as large as 2,000-6,000 acres each.

There is no County ordinance or policy that prohibits a land division into parcels that are smaller than surrounding parcels. But the reality is that Rancho La Laguna is surrounded by parcels of a wide range sizes. Many of the neighboring parcels are comparable in size to the proposed parcels at Rancho La Laguna, and many are much smaller than the proposed parcels. See the attached map showing the project lot layout and the surrounding lands. The applicant also presented to the Commission aerial photographs showing the reason for the diversity in parcel sizes – the topography varies from canyons with relatively level cropland, to rolling hills with crops and vineyards, to steep hillsides that are suitable only for grazing and watershed.

2. The RDEs are larger than the 2 acres allowed under the Williamson Act.

The Williamson Act program is strictly voluntary and County practice and policy has been that no one will be forced into participating. However, the RDEs each represent an area within which all non-agricultural structures and related improvements must be confined. The RDEs generally exceed the ultimate building site size to give the owner flexibility in siting. The RDEs were sited and inspected by experts to avoid, to the extent feasible, visual, biological, geological, and cultural impacts, and to avoid prime soils, all with the intent of minimizing environmental impacts. The RDEs also allowed the FEIR to accurately analyze, using a worst-case approach, environmental impacts of the ultimate construction of an owner's house on each proposed parcel.

3. There could be incompatibility between land uses on adjacent parcels.

This fear is purely theoretical and not based upon any evidence in the record. As noted above, the FEIR concluded that the project had no potential for resulting in a significant environment impact that could not be mitigated to less than significant. The smallest proposed parcel exceeds 160 acres and, with the limitation of the owner's non-agricultural structures to the RDEs, each of which is located a substantial distance from shared property lines, the potential for one neighbor's agricultural operation interfering with another's operation is remote. There simply is no evidence of this imagined conflict or incompatibility.

4. Fear that agriculture will not continue on the parcels – we need a guaranty of continued agriculture.

There is no County policy or land use regulation that requires, or allows the County to require, a landowner to stay in agriculture. That applies equally to the

existing parcel and all proposed parcels. Nor can any applicant be required to make such a guaranty. In this case, though, it isn't an issue. The existing parcel is host to a wide variety of agricultural operations. There is ample room on the property for vineyard development, which has not yet been pursued because the present owners prefer cattle grazing. The grazing land generally is top notch and the current cattle herd's quality and health, per the Sage report, demonstrate the strength of the cattle operation. With such valuable farm land and grazing land, there is no basis for concluding that future owners will not make use of these assets, particularly the farmland. Farm land in Santa Barbara County, including this property, is highly profitable. It is highly unlikely that the owner of one of the proposed parcels would turn his/her back on the revenue that can be realized from farming, or leasing to someone else to farm. As pointed out repeatedly by one Commissioner, this is extremely remote property. Why would someone want to own and live on remote land such as this and not either conduct agriculture personally or lease the land to third parties to farm and graze the land? Living on this land would have to be a choice, because it is a long trip to the grocery store or an evening dining out.

5. Creating more lots than exist, with a residence on each lot, is urbanization that is contrary to the Agricultural Element. Houses, fences, lights on the houses, and utility infrastructure for the houses create an urban influence in a very rural location.

The Agricultural Element and other County policies and ordinances do not regard the owner's house on agricultural land as being "urban." Scattered residences and fences are entirely consistent with rural land. The limited lighting from these houses and utility lines on rural parcels do not make an area urban.

Webster's Dictionary defines "urban" as "of, relating to, characteristic of, or constituting a city."

Uniform Rule No. 1 states: "The Board of Supervisors recognizes the importance of providing housing opportunities on agricultural land enrolled in the Agricultural Preserve Program, in order to accommodate landowners and their agricultural employees,"

The AG-II-100 zone district allows, in addition to agriculture, a single family dwelling, a guest house, and residential accessory uses and structures. Under the Zoning Ordinance, as well as the Uniform Rules, the owner's residence and associated development site is not an urban use – it is an allowed use in the agricultural zone and in agricultural preserves.

Therefore, the characterization of the owner's residence (and the building site for same) on any of the proposed Rancho La Laguna lots as being "urban" is inaccurate and contrary to State and County laws, ordinances, and policies that acknowledge that a residence on an agricultural parcel is both acceptable and

appropriate. County ordinances and policies acknowledge that the owner's residence is a part of the agricultural operation.

6. Close proximity of residences to the farm fields on their parcels will result in conflict between residents of house and the agricultural production.

The underlying premise that the owner's residence and the agricultural operation are conflicting uses is just plain contrary to the facts. The residents who would live on these parcels would not be strangers who get nothing from the proximity to agriculture – they would own the agriculture that yields the substantial profits that allow the owners to continue to live on the land. There is no factual basis for contending that the farmer/rancher would live on the land but be bothered by the agriculture that provides much or all of the family income. We enclose ample evidence of the true fact that farmers live next to their fields all over Santa Barbara County, and probably the world. The finding is without substance and cannot provide a basis for denial of the project. The attached photographs of owners' houses nestled down right next to farm fields in Santa Barbara County provide the sole evidence in the record regarding the proximity of houses to cultivated fields and it is obvious that there is no conflict. See the discussion below regarding the alleged proximity of some RDEs to cultivated land on the same parcel.

7. There is a project here, but this isn't it. The parcels should be larger and fewer.

This is just personal opinion and has no basis in evidence or County policy, demonstrating that the decision was arbitrary and capricious under the law. The statement also is vague and ambiguous.

8. The land division shouldn't be approved because one or more of these parcels could be sold by the family to cover estate taxes or to raise capital for agricultural improvements and intensification.

Because all of the proposed parcels are agriculturally viable, it makes no difference if an owner sells one or all. Agricultural potential remains the same, regardless of owner. This statement is inconsistent with State law, which abhors restraints on alienation of real property, and is contrary to County ordinances and policies, all of which treat all similarly situated landowners the same. A landowner is entitled to sell a parcel, regardless of the reason for the sale. Furthermore, expert testimony in the record demonstrates that being able to finance estate taxes or farm improvements by having more than one parcel to provide collateral is a benefit to the family farm or ranch, not a detriment to agriculture, provided that the parcels remain agriculturally viable. See attached letter from Larry Lahr of Rincon Corporation, explaining the economic factors that comprise the viability of an agricultural operation.

9. This land division is contrary to the Comprehensive Plan emphasis on agricultural viability.

This is not supported by the evidence in the record. See the discussion below of the staff report's significant about-face in analyzing the compatibility of the project with County policy. The discussion included in the FEIR and in the initial staff report supports project approval and is based upon evidence in the record and County policy. It differs markedly from the most current such analysis prepared to try to bolster findings for project denial. The inconsistency is not a reflection on County staff. They analyzed the project for over 10 years and recommended approval. The staff was forced to ignore their recommendation and draft findings for denial, but there is no evidence in the record to support those findings. They did the best that they could, but it requires misinterpreting clear language in County policy to find any basis for the findings for denial.

10. Land designated AC – Agriculture Commercial – should not be divided. This is a step toward a more urban environment.

There is no evidentiary basis for applying this principle to Rancho La Laguna. The Rancho La Laguna proposal, to create lots ranging in size from over 160 acres to over 600 acres cannot be considered to be creating a more urban environment, especially in an area where parcels of no more than 100-acres are not unusual. More to the point, there is nothing in County ordinances or policies that supports the contention that AC land may not be divided, if the land division meets the minimum requirements set by zoning, and results in agriculturally viable parcels that meet the more general criteria for safe access, adequate services, and the requirements of the Subdivision Map Act.

The Findings Adopted by the Planning Commission Are Not Supported by Substantial Evidence in the Record and Are Contrary to the Overwhelming Evidence in the Record.

The findings adopted by the Planning Commission conclude, with no evidence whatsoever in the FEIR or elsewhere in the record, that a future residence on any of the proposed lots "has the potential to create conflicts between the existing agricultural operations and future residential uses." As noted above, this "potential" is pure conjecture and is not based on evidence in the record.

The adopted findings also conclude that the project will not assure and enhance agriculture because of the alleged proximity of RDE's to agricultural cultivation on Lots 1-3, 4, 7, 12 and 13. The RDE's originally proposed for these parcels are of the following sizes, respectively³:

Lot 1 – 7.2 acres

Lot 2 – 9.6 acres

³ The applicants have offered to agree to a condition that, despite the RDE size analyzed in the EIR, none of the actual development envelopes on the proposed lots would exceed 5 acres and that Lots 9 through 13 would be put into Williamson Act contracts following map recordation, which would limit the owner's non-agricultural development to 2 acres..

Lot 3 – 15.2 acres

Lot 4 – 2.7 acres

Lot 7 – 7.0 acres

Lot 12 – 2.6 acres

Lot 13 – 2.3 acres

The following list sets forth the distances, in linear feet and in elevation, between the RDE's and the cultivated fields:

Lot 1 is set back 400' from the farm field. The farm field elevation is 1070'; the RDE elevation is 1200' ... 130' above the field.

Lot 2 is set back 200' from the farm field. The farm field elevation is 1160'; the RDE elevation is 1200' ... 40' above the field.

Lot 3 is set back 50' from the farm field. The farm field elevation is 1229'; the RDE elevation is 1260' ... 41' above the field.

Lot 4 is set back 1000' from the farm field. The farm field elevation is 1317'; the RDE elevation is 1457' ... 140' above the field.

Lot 7 is set back 50' from the farm field. The farm field elevation is 1152'; the RDE elevation is 1200' ... 48' above the field.

Lot 12 is set back 100' from the farm field. The farm field elevation is 1440'; the RDE elevation is 1500' ... 60' above the field.

Lot 13 is set back 100' from the farm field. The farm field elevation is 1450'; the RDE elevation is 1580' ... 130' above the field.

These RDE's are of ample size, and of adequate setback between the closest edge of the RDE and the fields, for an owner to avoid siting the house close to the cultivation activity, if the owner so desires. Landowners generally place landscaping around their houses as well, so landscape screening can provide an additional barrier between residence and field.

To demonstrate this fact, the applicant presented to the Commission the aerial photographs attached hereto, evidencing the reality throughout the County of Santa Barbara's most productive farmland that owners' residences are located within very short distances – well under the minimum of 50 feet proposed for the Rancho La Laguna Parcels – and at the same elevation as the farm fields.

The findings also conclude that the division of the ranch into 13 lots would not assure and enhance agricultural operations on the site. No factual basis ties this finding to the

conclusion and the FEIR states to the contrary. So does the agricultural analysis prepared by agricultural consultant Orrin Sage and referenced in the FEIR. Both conclude that every one of the proposed parcels is agriculturally viable as a stand-alone unit.

The Findings Reference a Revised Policy Consistency Analysis that Directly Conflicts with the Evidence, Clear Wording of County Policies, and the Policy Consistency Analysis Originally Presented by Staff to the Planning Commission. The Original Policy Consistency Comports with the Actual Wording of County Policies; the Revised Policy Consistency Analysis Does Not.

The revised staff report, written in an attempt to support denial of the project, includes a completely altered policy consistency analysis, 180 degrees different from the original staff report's policy consistency analysis. To achieve this disparity, the revised analysis had to rely on speculation as to what "could" occur, and on misinterpretation of the actual wording of various County policies.

Attached are the two different policy consistency analyses.

The Original Policy Consistency Analysis Covers a Broad Range of Subjects, but the Major Conflict between the Two Policy Consistency Analyses Focuses on the Agricultural Element of the Comprehensive Plan.

The original analysis concluded that the proposed project was "consistent with the Agricultural Commercial (AC) land use designation, which is for commercially farmed, privately owned land located within either Rural, Inner-Rural, Existing Developed Rural Neighborhoods or Urban Areas which are subject to a Williamson Act Contract or lots 40 acres or larger which are eligible for a Williamson Act contract." (Original Staff Report, p. 11)

As to consistency with the Agricultural Element of the Comprehensive Plan, the original analysis concluded that the project was consistent because "the proposed project would not significantly impair the long term agricultural suitability and productivity of the site. This conclusion is based on the results of the weighted point system scores which resulted in each lot scoring above the 60 point threshold included in the County's *Environmental Thresholds and Guidelines Manual*, which indicates that all of the newly created lots would be agriculturally viable." (Original Staff Report, p. 17)

As to conformity with the Agricultural Element's policies pertaining to protecting agricultural lands from adverse urban influence, the original analysis states, "The proposed project is designed with lots that are generally sized to conform to the lot sizes of adjacent lots. Specifically, lots 1-4 and 5-8 range in size from 160.01-acres to 259.1-acres which is similar in size to the lots located to the south which range from 85 to 400-acres in size. Lots 9-13 are larger lots which range in size from 369.07-acres to 604.73-acres. These lots are similar in size to lots located to the north, east, and west of the site which range in size from 298-acres to 1,000-acres." (Original Staff Report, p. 18).

As to conformity with the Agricultural Element's policies pertaining to discouraging conversion of highly productive agricultural lands for long-term agriculture on the lots, the original analysis states: "The existing agricultural uses on the project site would remain, and there would be adequate area available for expansion and intensification of onsite agricultural uses on each of the newly created lots. No recreational or non-compatible land uses are proposed. In addition, in order to avoid interference with existing agricultural uses on the site, the proposed access roads and driveways would follow existing agricultural roads, and RDE's would not be located in areas which contain cultivate agriculture. . . . All of the newly created lots are eligible to be enrolled under Williamson Act contracts." (Original Staff Report, pp. 18-19)

As to conformity with the Agricultural Element's goals and policies pertaining to protecting agricultural lands from adverse urban uses and influences, the original analysis states: "The project site is located in a rural area. The proposed subdivision and future residential development within the RDEs would not be considered an urban use. As defined in the Land Use Element, (residential) urban development is defined as residential development at a density higher than one unit per five gross acres. . . . [T]he project does not include urban development (as defined by the Land Use Element) which would affect the stability of the Urban/Rural boundary line. Therefore, the proposed project is consistent with these policies and goals." (Original Staff Report, pp. 19-20)

The Revised Comprehensive Plan Consistency Analysis Is Deeply Flawed, As Described in this Section

The conclusions in the Revised Consistency Analysis have no basis in the evidence or in the actual County policy documents cited, as revealed below (italicized language is the Revised Staff Report wording):

"The proposed project has the potential to create conflicts between the existing agricultural operations and future residential uses which would be developed on the new lots."

There is no factual basis for this finding. The findings must be based upon facts in the record, not conjecture. As explained in detail above, the RDE's are separated by linear distance and topography from the cultivated lands. This finding is pure conjecture and does not provide a basis for a finding supportable under the law.

"According to the . . . Agricultural Element, adverse urban influences to agriculture include conflicts between urban and agricultural uses. These conflicts could occur as a result of the future development of residential structures and uses within RDE's that are located adjacent to areas of the site which have been historically utilized for agricultural cultivation."

The premise upon which this statement is based is incorrect. As described above, under the Agricultural Element, the County Uniform Rules for Agricultural

Preserves and the County Zoning Ordinance, the owner's dwelling is part of the agricultural use -- so are farmworker houses. These are not urban uses or influences. They are an integral part of the agricultural operation. Also as noted above, the RDE's are sited and sized to provide ample opportunity for the owner's residence to be a reasonable distance from the cultivated fields, but there is no reason to assume that owners would want to have their homes far from the fields. The mere presence of home discourages vandals, thieves, and poachers from entering agricultural land. That is the reason why you see so many houses located within a few feet of the farm fields -- it's practical and convenient.

"Future residential development and uses located in such close proximity to cultivated agriculture would create conflicts between the two uses, as the common nuisances associated with cultivated agriculture (e.g., pesticides, noise, dust, odors, etc.) would be experienced by residents living in these areas."

The underlying premise that the owner's residence and the agricultural operation are conflicting uses is contrary to the evidence in the record and to common sense. The "residents living in these areas" are not strangers who get nothing from the proximity to agriculture and who resent the noise, dust, etc. of farming. These are the landowners who either conduct the farming themselves or lease their land to a farmer. There is no factual basis for contending that the farmer/rancher would live on the land but be bothered by the agriculture that provides revenue. Attached is ample evidence of the true facts -- farmers live next to their fields all over Santa Barbara County, and probably the world. The finding is without substance and cannot provide a basis for denial of the project.

"These types of conflicts could lead to adverse modifications or reductions in the existing agricultural operations on the site which would violate the integrity and discourage the expansion of the existing agricultural operations on the project site."

There is no factual basis for contending that someone would choose to buy and live on agricultural property with cultivated fields, then decide to shut down or reduce the agricultural operation that yields sizeable profits. The enclosed aerial photographs demonstrate why this statement, made with no factual basis, is contrary to reality. There simply is no basis for this finding. It is based solely upon very misplaced conjecture.

"The proposed subdivision would not assure and enhance the existing agricultural operations on the site since these operations would be separated onto smaller lots which may be owned and operated by separate property owners."

As noted in the FEIR, the cultivated fields already are operated by different lessees. The fencing that one would expect between neighboring farm fields owned by different people already exists -- it defines the boundaries between lots. Locating these fields on different legal parcels will have no impact at all on their viability. Also as noted in the EIR, all of the different cultivated fields, as

well as all of the different livestock grazing pastures, enjoy water service from the existing shared agricultural irrigation system. They all will continue to be served in the same manner after the land division, so nothing will change in regard to water delivery. The separation of the agricultural lands into smaller lots will not significantly impact agricultural viability of this ranch. That is supported by analyses conducted by Orrin Sage, County Staff, and the EIR consultant. That is the sole evidence in the record. There is no evidence in the record to support this proposed finding. It is baseless.

"In addition, the acreages proposed for lots 1, 2, 5, 6, 12 and 13 are significantly smaller and are not consistent with the acreages of the surrounding adjacent parcels"

As noted above, and as demonstrated by the attached map, this finding is untrue and unsupported by the record. The proposed parcels are consistent with immediately surrounding lands that are similarly situated on a combination of prime farmland and foothills. Rancho La Laguna is not as mountainous like much of the abutting land and it will remain viable after the subdivision.

Dividing agricultural land into smaller parcels doesn't violate the Agricultural Element when the resulting parcels all are agriculturally viable independently. The Agricultural Element anticipated land division and did not discourage it, if agriculture remained viable. The Uniform Rules allow for land division, provided the resulting parcels are eligible for Agricultural Preserve status. The FEIR and County staff – and the Agricultural Preserve Advisory Committee – have concluded that all of the proposed lots will be eligible for Williamson Act contracts. The proposed finding is contrary to the evidence in the record and does not support denial of the project.

"Installing utilities such as the proposed State Small Water System, as well as access roads to serve each of the new lots, may lead to additional development in this rural area since it would remove the impediments to growth which are currently in place (lack of utilities and access). The removal of these impediments could also encourage further subdivision of agriculturally zoned land located adjacent to the project site due to its perceived subdivided value."

This finding also is contrary to the evidence in the record. The only "through roads" in this project (i.e., roads that could or would extend into neighboring parcels) already exist and they already serve neighboring parcels. These roads existed by recorded easement when the Applicants purchased the Ranch. No new roads are proposed that could conceivably provide access to neighboring lands. The new roads dead-end within the Ranch. The utility lines (other than the waterlines) already exist. The project would necessitate some internal extensions, but the utility lines exist regardless of the land division.

The domestic shared water system is sized only for the proposed parcels and may never be constructed because the project allows the individual lots to be

served by individual wells, which is more economical than constructing a large shared water system with long connecting pipelines and storage tanks.

The agricultural irrigation system already exists but is not designed, nor does it have capacity, to serve neighboring parcels. In any event, the agricultural irrigation system is part of the baseline, not a part of this project.

In short, the proposed new infrastructure is localized to this ranch and isn't designed or located to serve offsite properties. It has no growth inducement potential.

The mere land division of the parcel into 13 lots sets no precedent that would spark a rash of new subdivisions, as the finding suggests. Any neighbor seeking to divide a parcel would have to undergo the same lengthy process that this project has experienced and would have to demonstrate agricultural viability for each proposed lot as the applicants have done for Rancho La Laguna. Given the neighboring topography, the likelihood of any landowner being able to meet the exacting test of agricultural viability is remote. The evidence in the record is that there has been a great deal of division of the original ranchos into smaller parcels, but agriculture continues on those parcels, with no recent subdivisions. This project doesn't set a precedent – it reflects a pattern of land division that has occurred over the decades at a very slow rate. In short, this finding is unsupported by the evidence in the record.

"According to the Santa Barbara County Comprehensive Plan Open Space Element, subdividing larger ranches into smaller lots raises surrounding land values and taxes to levels which make it difficult to preserve agriculture in the County. The increased land values resulting from the proposed subdivision may lead to an increase in the speculative value of adjacent agricultural lands based on the perceived subdivision value making it less economically viable for agricultural uses."

This finding heaps conjecture upon conjecture and is based on outdated statements in the Open Space Element, which was adopted in 1979 and republished in 2009 (not revised, just republished). The Open Space Element has antiquated language regarding escalating taxes (now held in check by Proposition 13) and high value agricultural land steadily becoming less economic because of those taxes. We reviewed the Open Space Element several times and never found the language alleged in the finding. What we did find was a discussion in the Open Space Element (p. 10) of the "constant threat" of development pressures on agriculture land **on the urban fringe**, stating, "Most vulnerable are farm operations that have low or declining profit margins, especially when this results from the land being assessed for its development potential rather than its agricultural yield."⁴ Those statements are no longer valid

⁴ Prior to adoption of Proposition 13 by California voters, land in the County of Santa Barbara was assessed every few years based upon current opinions of value. As a result, many elderly people had to sell their homes because of rising taxes and agricultural land, particularly those close to urban limit lines, were taxed at extraordinarily high rates, putting cattle ranching and similar low-yield operations in jeopardy.

because of Proposition 13 and the Williamson Act. Rancho La Laguna is not close to an urban center in any event. As noted by individual Planning Commissioners, the ranch is remote from urban areas. The concept of growth inducement as a result of this project is laughable when one considers that the project, as carefully planned and studied as it was, has taken well over 10 years to reach this point, and the fact that staff was unable to find another comparable project in recent history. The only two remotely similar projects were Rancho Saguaro in the mid-1980's (located in the outskirts of Santa Ynez) and Mission Oaks Ranch in the mid-1990's (located adjacent to Buellton). There have been none since and none in areas like Rancho La Laguna, located far from urban centers. In short, there is no factual basis for this finding – it is based upon speculation and a factual context that no longer exists.

“According to the Agricultural Element, once the economic viability for agricultural uses on agricultural land is lost, there is inherently increased pressure for further divisions of the property and ultimate conversion of the agricultural land to urban uses. Therefore, the proposed project would not be consistent with these Agricultural Element goals and policies.”

The Agricultural Element says no such thing. The Agricultural Element's references to “urban” all deal with the friction between productive agricultural land and adjacent lands with encroaching small lot residential subdivisions, shopping centers, and commercial/industrial development – non-agricultural uses accompanied by heavy vehicular traffic and dense human populations who know nothing about agriculture and are intolerant of the noise, odors, dust, etc. generated by agriculture. This finding grossly distorts what the Agricultural Element actually says. Recall that the farmers and ranchers who wrote the Agricultural Element and presented it to the Board of Supervisors, where the language was refined but not changed from its original meaning and intent, looked to the County to stop impeding their operations through regulations, trail exactions, and restrictions, to stop allowing urban areas to spill onto agricultural lands and conflict with neighboring ag operations, to stop listening to complaining urbanites who didn't like the dust, noise, smoke, and odors emanating from neighboring ag lands, and to start adopting programs and policies that actually would make it easier to conduct agricultural operations in the County.

As a consequence, Goal I and its implementing policies call for the County to assure and enhance continuation of agriculture by encouraging it and supporting its expansion and intensification (the Board of Supervisors added the qualifying language, “taking into account environmental impacts” reflecting the political pressure, primarily from groups like the Environmental Defense Center, to increase environmental regulations on agriculture). The first implementing

policy under Goal I was intended to rein in the County's practice of requiring public trails as a condition on virtually every permit issued for agricultural land.⁵

Goal II requires that agricultural lands be protected from adverse urban influence. This goal addressed the gradual urbanization extending out from the cities and townships as land within spheres of influence were being built out. It does not prohibit or even address land divisions on rural agricultural lands.

Goal III takes into account the reality that some agricultural land is located within a city's sphere of influence or actually within an urban area, so some expansion of urban development into agricultural land was inevitable. But, if development were to extend out from the existing urban area, it should be done in a way that it didn't compromise neighboring agriculture.

Goals IV and V address the need to provide accommodation in the County's regulations for farmers and ranchers to conduct controlled burns and grading to protect their operations from fire, and would allow supportive uses (e.g., farm stands, processing facilities and coolers) near the farms, not solely in industrial areas around the cities.

Goal VI addresses the County's neglect of the rural roads.

Nothing in the Agricultural Element uses the language or expresses the meaning set forth in this proposed finding.

Analysis of Specific Proposed Findings

2.1.4 – "[T]he Tentative Tract Map for which the proposed State Small Water System will serve is inconsistent with the Santa Barbara County Comprehensive Plan Agricultural Element. Therefore, the proposed State Small Water System is also not consistent with the Comprehensive Plan and this finding cannot be made."

Because this finding is based upon the false premise that the project is inconsistent with the Agricultural Element, it likewise is false and without any factual basis. Full analysis of the project consistency with the Agricultural Element, and the erroneous conclusion that the project is inconsistent with the Agricultural Element, is set forth above.

2.2.A.2 – "As discussed in Section 2.0, Comprehensive Plan Consistency, of the Planning Commission staff memorandum dated May 11, 2017, . . . the proposed project is inconsistent with the Santa Barbara County Comprehensive Plan Agricultural Element."

⁵ Policy I.A. solely creates new limits on public trail exactions; Policy I.B. reflects what later became the Right to Farm Ordinance; Policy I.C. requires County encouragement of land improvement programs; Policy I.D. encourages use of the Williamson Act and other agricultural land protections; Policy I.E. acknowledges that agriculture results in noise, smoke, odor, and dust; Policy I.F. requires protection of natural resources, stabilizing urban/rural boundaries, and promotion of conservation; and Policy I.G. encourages sustainable agriculture.

Because this finding is based upon the false premise that the project is inconsistent with the Agricultural Element, it likewise is false and without any factual basis. Full analysis of the project consistency with the Agricultural Element, and the erroneous conclusion that the project is inconsistent with the Agricultural Element, is set forth above.

2.2.A.3.a – “As discussed in Section 2.0, Comprehensive Plan Consistency, of the Planning Commission staff memorandum dated May 11, 2017, . . . the proposed project is inconsistent with the Santa Barbara County Comprehensive Plan Agricultural Element.”

Because this finding is based upon the false premise that the project is inconsistent with the Agricultural Element, it likewise is false and without any factual basis. Full analysis of the project consistency with the Agricultural Element, and the erroneous conclusion that the project is inconsistent with the Agricultural Element, is set forth above.

2.2.A.3.e – “The future development of residential structures and uses . . . on the project site are likely to result in direct and indirect impacts to wildlife habitat. In addition to the removal of vegetation for the future development of single family dwellings and accessory structures, the location of additional agricultural development throughout the project site is likely to fragment habitats and impact wildlife corridors.”

This finding stands in stark contrast to the original findings, which, for this particular issue, stated that as described in the FEIR and the Planning Commission Staff Report dated January 5, 2017, “adverse environmental impacts are mitigated to the maximum extent feasible. As a result, the design of the subdivision is not likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat.” The original finding is supported by extensive evidence in the FEIR and by the long list of conditions that ensure implementation of the FEIR’s mitigation measures. There is no evidence whatsoever in the record to support the revised finding.

The revised finding is not supported by any evidence in the record. To the contrary, it conflicts with the uncontroverted evidence in the FEIR that the RDEs, utilities, driveways and road widening will not significantly fragment habitats or impact wildlife corridors.

2.3.A.6 – “As discussed in Section 2.0, Comprehensive Plan Consistency, of the Planning Commission staff memorandum dated May 11, 2017, . . . the proposed project is inconsistent with the Santa Barbara County Comprehensive Plan Agricultural Element.”

This finding for tentative map approval broadly requires conformity with any adopted County general plan or highway alignment. Because this finding is based upon the false premise that the project is inconsistent with the Agricultural Element, it likewise is false and without any factual basis. Full analysis of the

project consistency with the Agricultural Element, and the erroneous conclusion that the project is inconsistent with the Agricultural Element, is set forth above.

The original finding under this section references the January 5, 2017 staff report in stating that "compliance with the project description and required conditions of approval will ensure that the design and improvements of the subdivision and future development are consistent with the County's Comprehensive Plan, and the Land Use Development Code." The original finding is supported by the FEIR and all evidence in the record.

Conclusion

The key to the findings upon which the Planning Commission based its denial of the Rancho La Laguna project is the issue of agricultural viability. The FEIR notes (p. 4.2-1) that agricultural values in the County have grown steadily since 2002 – nearly doubling in that time. Harvested crop acreage across the County increased by 3,755 acres between 2012 and 2013. Rancho La Laguna played a role in the increase in cultivated agriculture and in the dollar yield from livestock sales. The applicants purchased a ranch that was in serious decline. When they acquired the property, the only water well was sanded in and not producing so there was no commercial crop production. The applicants drilled new wells and turned these fields into a highly productive agricultural enterprise, with over 500 acres of cultivated crops. They replaced fencing and installed new fencing to maximize the grazing potential, resulting in a high quality, marketable, and healthy cattle herd. Their objective was to make this the best agricultural operation possible. They declined to plant, or allow lessees to plant, vineyards because they chose to preserve and enhance the cattle operation instead.

The FEIR includes an ultra-conservative analysis (exceedingly conservative) of the factors that the County uses to determine agricultural viability, yet all of the proposed parcels passed this exacting test and are agriculturally viable as stand-alone operations. The FEIR also determined that the impact of the proposed RDEs is Class III – Less Than Significant.

The proposed lot sizes exceed the minimum allowed under zoning.

The project is consistent with all Comprehensive Plan policies and includes an innovative and effective mitigation plan – a plan based upon adaptive management principles. Although CEQA requires that the potential impacts of a project be based upon conditions that existed at the time of the Notice of Preparation of the environmental document ("baseline"), this FEIR goes further. The FEIR author recognized, and took into account, the potential that buildout of the thirteen (13) potential owners' residences could extend for many years and even decades. During that time period, agricultural and environmental conditions can be expected to change significantly. The project conditions incorporate the FEIR mitigation measures, which require that the actual conditions in the field at the time of a project-related earth disturbance be assessed and mitigated. So, if there is no badger den in or near an

RDE today, but an enterprising badger digs one in the future, the mitigation measures require that it be avoided or, if avoidance isn't possible, that steps be taken to avoid potentially significant environmental impacts *on the environment as it stands at the time of proposed disturbance*. I am unaware of any other project conditions that have so completely incorporated the concept of adaptive management.

This project complies with the County's Comprehensive Plan and Zoning Ordinance. The mitigation measures are substantial, in fact superlative.

Although the Planning Commission and the Board of Supervisors have discretion in approving or denying subdivision projects, that discretion must be exercised reasonably. The decision must be based upon facts, not fears or preferences. The findings must demonstrate a logical path connecting the evidence in the record with the final decision. There must be a firm factual basis for findings made and findings cannot be based on untrue or improper interpretations and characterizations of facts, laws and policies.

There is no basis in law or evidence for denying this project. The Planning Commission denial was arbitrary and capricious under the law. Rancho La Laguna is not public property. It is private property and, consistent with the law, the owners have a constitutional right to divide it if they so desire. There must be a sound basis for denying them that right. The findings upon which the Planning Commission based its denial are flawed, which is not surprising given the solid record in support of project approval. It was no easy task for the staff to formulate findings for denial. Neither the findings nor the evidence in the record provide a basis for project denial – that task is impossible to achieve because there is no evidence to support the decision.

We urge ask that the Board of Supervisors overturn the Planning Commission decision and approve this project. It is the right thing to do.

Attachments:

- Staff-proposed findings for Project approval
- Agricultural Preserve Advisory Committee minutes 10/3/2008
- FEIR Table 4.2-8 – Consistency with agricultural policies in the Comprehensive Plan Agricultural Element and Land Use Element
- Sage Associates agricultural analysis, with updates
- Staff analysis of agricultural viability – excerpt from Draft Mitigated Negative Declaration
- Map of project and surrounding parcels
- Photographs of owner-homes in midst of farm fields in Santa Barbara County
- February 26, 2010 letter from expert Larry Lahr, Rincon Corporation
- Original staff report policy consistency analysis
- Revised staff report policy consistency analysis

ORIGINAL FINDINGS

ATTACHMENT A: FINDINGS

1.0 CEQA FINDINGS

1.1 ENVIRONMENTAL IMPACT REPORTS

Findings pursuant to public resources code Section 21081 and the California Environmental Quality Act Guidelines Sections 15090 and 15091:

1.1.1 CONSIDERATION OF THE ENVIRONMENTAL IMPACT REPORT

The Final Environmental Impact Report (16-EIR-1) was presented to the Planning Commission and the Planning Commission has reviewed and considered the information contained in the Final EIR (16-EIR-1) and its appendices [and any supplements or addenda] prior to approving the project. In addition, the Planning Commission have reviewed and considered testimony and additional information presented at or prior to public hearing on January 25, 2017. The Final EIR reflects the independent judgment and analysis of the Planning Commission and is adequate for this proposal.

1.1.2 FULL DISCLOSURE

The Planning Commission finds and certifies that the Final EIR (16-EIR-1) constitutes a complete, accurate, adequate and good faith effort at full disclosure under CEQA. The Planning Commission further finds and certifies that the Final EIR has been completed in compliance with CEQA.

1.1.3 LOCATION OF RECORD OF PROCEEDINGS

The documents and other materials which constitute the record of proceedings upon which this decision is based are in the custody of the Secretary of the Planning Commission located at 123 East Anapamu Street, Santa Barbara, CA 93101.

1.1.4 FINDINGS THAT CERTAIN UNAVOIDABLE IMPACTS ARE MITIGATED TO THE MAXIMUM EXTENT FEASIBLE

This finding is not applicable because the Final EIR (16-EIR-01) concluded that the project will not result in significant and unavoidable (Class I) impacts.

1.1.5 FINDINGS THAT IDENTIFIED PROJECT ALTERNATIVES ARE NOT FEASIBLE

The EIR analyzed three alternatives to the proposed project, which include: 1) a no project/no development alternative; 2) agricultural cluster alternative; and 3) reduced lots alternative. The EIR identified Alternative 3 as the environmentally superior alternative. This finding is not applicable to this project because findings rejecting alternatives are required only if one or more significant environmental effects will not be avoided or

substantially lessened by mitigation measures. The EIR concluded that no impacts of the project were significant and unavoidable; therefore, the Planning Commission need not make findings rejecting the alternatives described in the EIR. (Pub. Resources Code Section 21081; 14 CCR 15091.).

1.1.6 FINDINGS THAT CERTAIN IMPACTS ARE MITIGATED TO INSIGNIFICANCE BY CONDITIONS OF APPROVAL

The Final EIR (16-EIR-01) identifies several subject areas for which the project is considered to cause or contribute to significant, but mitigable environmental impacts (Class II). For each of these Class II impacts identified by the Final EIR (16-EIR-01), feasible changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects, as discussed below:

Aesthetics

Significant but mitigable impacts identified in the Aesthetic Resource analysis of the EIR include impacts resulting from the removal of mature oak trees which would result in the loss of scenic resources. Mitigation identified in the EIR requires the implementation of a tree replacement plan requiring that oak trees which are visible from public roadways and would need to be removed due to project construction shall be replaced with oak trees in locations that are visible from such roadways (AES-2). This measure would reduce Aesthetic impacts to less than significant.

Biological Resources

Significant but mitigable impacts identified in the Biological Resources analysis of the EIR include impacts to special status plant and animal species, sensitive habitats including riparian areas, wetlands, oak trees, wildlife movement, as a result of future development of access roads, infrastructure, and the RDEs.

According to Section 4.4, Biological Resources, of the Environmental Impact Report (16-EIR-01) prepared for the project, approval of the tentative tract map and subsequent development of the Residential Development Envelopes (RDE's), access roads and infrastructure may result in impacts to special status plant and animal species, sensitive habitats including riparian areas, wetlands, oak trees and wildlife movement. Specifically, there are twenty-two special status plant species which have the potential to be impacted. Mitigation measures from the EIR requiring pre-construction surveys for special status plant species (B-1(a)), avoidance, minimization and mitigation if special status plant species are found during pre-construction surveys (B-1(b)) will reduce impacts to special status plant species to less than significant.

In addition, there are twenty-one special status animal species which have the potential to be impacted by future development. These include the California tiger salamander

(CTS), California red-legged frog (CRLF), and the Least bell's vireo. Mitigation measures include consultation with USFWS and CDFW (B-1(c)), protocol surveys prior to the approval of permits for development (B-1(d)), habitat avoidance and compensatory mitigation (B-1(g), B-1(e)), a Habitat Mitigation and Monitoring Program (B-1(f)), pre-construction surveys (B-1(i-o)), and the implementation of a worker environmental awareness program (B-1(p)). Additional mitigation measures address potential impacts to riparian habitat and drainages (B-3(a-e), B-5), weed control, oak trees and fire hazards (B-2(a-c), B-4(a,b), B-6(a,b)). Therefore, mitigations applied to the project would reduce impacts to Biological Resources to less than significant.

Cultural Resources

The EIR finds potentially significant but mitigable impacts associated with Cultural Resources as previously unidentified subsurface archaeological resources may be unearthed during development of the project. Mitigation measure CR-2 requires the applicant and/or their agents, representatives or contractors to stop or redirect work immediately in the event archaeological remains are encountered during grading, construction, landscaping or other construction-related activity. The applicant would retain a P&D approved archaeologist and Native American representative to evaluate the significance of the find in compliance with County Cultural Resource Guidelines Provisions for Phase 2 and Phase 3 investigations. Therefore, mitigation applied to the project would reduce impacts to Cultural Resources to less than significant.

Geology

Significant but mitigable impacts identified in the Geology analysis of the EIR include moderate liquefaction hazards, and structural instability resulting from soil types with at least moderate potential for expansiveness. Mitigation measures requiring site specific studies for liquefaction and expansive soils (G-3, G-6) would reduce geological impacts to less than significant.

1.1.7 ENVIRONMENTAL REPORTING AND MONITORING PROGRAM

Public Resources Code Section 21081.6 and CEQA Guidelines Section 15091(d) require the County to adopt a reporting or monitoring program for the changes to the project that it has adopted or made a condition of approval in order to avoid or substantially lessen significant effects on the environment. The approved project description and conditions of approval, with their corresponding permit monitoring requirements, are hereby adopted as the reporting and monitoring program for this project. The monitoring program is designed to ensure compliance during project implementation.

2.0 ADMINISTRATIVE FINDINGS

2.1 CONDITIONAL USE PERMITS

Findings required for all Conditional Use Permits. In compliance with Subsection 35.82.060.E.1 of the County Land Use and Development Code, prior to the approval or conditional approval of an application for a Conditional Use Permit or Minor Conditional Use Permit the review authority shall first make all of the following findings, as applicable:

2.1.1 The site for the proposed project is adequate in terms of location, physical characteristics, shape, and size to accommodate the type of use and level of development proposed.

The 3,951 acre project site is adequate in terms of location, physical characteristics, shape and size to accommodate the proposed state small water system. The project site is located in a rural area of the County which is characterized by agricultural uses, and low intensity residential development. As discussed in Section 6.2 of the staff report dated January 5, 2017, incorporated herein by reference, the project will allow for the installation of a state small water system to provide water to 13 new lots associated with TM 14,709. Water lines and associated infrastructure will be installed from an existing water well out to the proposed lots. All new water pipelines will be placed within existing ranch roads, including those that are proposed to provide access to RDEs. These areas of the site do not contain steep slopes, and require minimal grading activities for installation of the water pipe lines. Any excess cut generated from grading activities will be used as additional fill to offset shrinkage and compaction of cut material, or to supplement grades elsewhere on the site. No offsite hauling of excess material is proposed. Therefore, this finding can be made.

2.1.2 Within the Inland area significant environmental impacts will be mitigated to the maximum extent feasible.

As discussed in the EIR prepared for the project (16-EIR-01), and Section 6.1 (Environmental Review) of the Planning Commission staff report dated January 5, 2017, and incorporated herein by reference, adverse environmental impacts are mitigated to the maximum extent feasible. Therefore, this finding can be made.

2.1.3 Streets and highways are adequate and properly designed to carry the type and quantity of traffic generated by the proposed use.

The proposed project will allow for the development of a state small water system to serve 13 new lots created by TM 14,709. No traffic will be generated from the proposed water system. Access to the project site will continue to be provided by an existing driveway accessed from Foxen Canyon Road. Foxen Canyon Road is a public roadway that is maintained by the County and is adequate and properly designed to carry traffic

associated with construction and maintenance of the water system. According to the project description, proposed access roads and driveways serving the water system and future development within the RDE's will be constructed and improved in accordance with Santa Barbara County Fire Department requirements. Therefore this finding can be made.

2.1.4 There will be adequate public services, including fire protection, police protection, sewage disposal, and water supply to serve the proposed project.

As discussed in Section 6.2 of the Planning Commission staff report dated January 5, 2017, incorporated herein by reference, adequate ingress/egress, police and fire protection, infrastructure and public and private services are available to serve the site. The proposed state small water system will not create any significant environmental impacts or require additional services. Therefore, this finding can be made.

2.1.5 The proposed project will not be detrimental to the comfort, convenience, general welfare, health, and safety of the neighborhood and will be compatible with the surrounding area.

The proposed state small water system will be reviewed and approved by Environmental Health Services (EHS) to ensure that it is not detrimental to the health and safety of water system users and other surrounding residents and persons and is compatible with the surrounding area. The project is conditioned (Condition No. 43 of Attachment B.2) to require compliance with the EHS condition letter dated December 27, 2016. This letter states that Environmental Health Services must find the proposed shared water system to be in compliance with State regulations for domestic use prior to map recordation. Therefore, this finding can be made.

2.1.6 The proposed project will comply with all applicable requirements of this Development Code and the Comprehensive Plan, including any applicable community or area plan.

As discussed in Sections 6.2 and 6.3 of the Planning Commission staff report dated January 5, 2017, incorporated herein by reference, the project complies with all applicable requirements of the LUDC and the Comprehensive Plan. The project site is not subject to a community or area plan. Therefore, this finding can be made.

2.1.7 Within rural areas as designated on the Comprehensive Plan maps, the proposed use will be compatible with and subordinate to the rural and scenic character of the area.

The water system will provide water for future residential development associated with 13 new lots created by TM 14,709. In order to be compatible with and subordinate to the rural and scenic character of the area, water pipelines and infrastructure associated with the state small water system will be located within existing roadways on the project site

or in areas of the parcel that do not contain steep slopes. Therefore, the project is consistent with this finding.

2.2 TENTATIVE MAP FINDINGS (SUBDIVISION MAP ACT)

- A. Findings for all Tentative Maps.** In compliance with the Subdivision Map Act, the review authority shall make the following findings for the Rancho La Laguna Vesting Tentative Tract map, Case No. 06TRM-00000-00002:

- 1. State Government Code §66473.1.** The design of the subdivision for which a tentative map is required pursuant to §66426 shall provide, to the extent feasible, for future passive or natural heating or cooling opportunities in the subdivision.

Future residential development located within the RDEs will be able to take advantage of solar exposure for natural heat and light and prevailing winds for natural cooling effects. There is sufficient northern, southern, eastern and western exposure for passive or natural heating or cooling opportunities within the RDEs. Therefore, this finding can be made.

- 2. State Government Code §66473.5.** No local agency shall approve a tentative map, or a parcel map for which a tentative map was not required, unless the legislative body finds that the proposed subdivision, together with the provisions for its design and improvement is consistent with the general plan required by Article 5 (commencing with §65300) of Chapter 3 of Division 1 or any specific plan adopted pursuant to Article 8 (commencing with §65450) of Chapter 3 of Division 1.

As indicated in sections 6.2 and 6.3 of the staff report dated January 5, 2017, incorporated herein by reference, with the implementation of the recommended conditions of approval, the proposed project is consistent with the applicable policies of the Comprehensive Plan. Adequate ingress/egress, infrastructure and public and private services are available to serve the proposed lots. Therefore, this finding can be made.

- 3. State Government Code §66474.** A legislative body of a city or county shall deny approval of a tentative map, or a parcel map for which a tentative map was not required if it makes any of the following findings:

- a. The proposed map is not consistent with applicable general and specific plans as specified in §66451.**

As discussed in Sections 6.2 and 6.3 of the staff report dated January 5, 2017 incorporated herein by reference, with compliance with the project description and conditions of approval identified in Attachment B.1, the project will be consistent with all applicable policies of the County's Comprehensive Plan, the Santa Barbara County Land Use and Development Code, and Chapter 21, the County Subdivision Ordinance. Therefore, this finding can be made.

- b. The design or improvement of the proposed subdivision is not consistent with applicable general and specific plans.**

As discussed in Sections 6.2 and 6.3 of the staff report dated January 5, 2017 incorporated herein by reference, with compliance with the project description and conditions of approval identified in Attachment B.1, future residential improvements of the subdivision will be consistent with the County's Comprehensive Plan. Therefore, this finding can be made.

- c. The site is not physically suitable for the type of development proposed.**

The proposed project will subdivide the 3,951-acre project site into 13 legal lots ranging in size from 160-acres to 605-acres. The 3,951-acre project site is sufficient in size to accommodate the future development of 12 single family dwellings and accessory structures. As discussed in Sections 6.1 (Environmental Review), and 6.2 (Comprehensive Plan Consistency) of the staff report dated January 5, 2017 and incorporated herein by reference, adequate public and private services will be available to serve the newly created lots and associated development. In addition, environmental impacts associated with the project have been mitigated to the maximum extent feasible. Therefore, the site can be found suitable for the proposed subdivision and this finding can be made.

- d. The site is not physically suited for the proposed density of development.**

The 3,951-acre project site is zoned AG-II-100, with a 100-acre minimum lot size. The project is proposing to subdivide the project site into 13 legal lots ranging in size from 160-acres to 605-acres. As discussed in Section 6.2 of the Planning Commission staff report dated January 5, 2017, incorporated herein by reference, the proposed lot sizes are all larger than the minimum lot size of 100-acres, and therefore, the density of future development on the project site is less than the maximum allowable under the AG-II-100 zone district. Future residential development consisting of a single family dwelling and residential accessory structures will be confined to proposed RDEs. As discussed in Section 6.1 (Environmental Review) of the staff report dated January 5, 2017, incorporated herein by reference, the project site is sufficiently sized to accommodate the future residential development and associated infrastructure without creating significant environmental impacts on the environment. Therefore, this finding can be made.

- e. The design of the subdivision or the proposed improvements are likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat.**

As discussed in the EIR prepared for the project (16-EIR-01), and Section 6.1 (Environmental Review) of the Planning Commission staff report dated January

5, 2017, incorporated herein by reference, adverse environmental impacts are mitigated to the maximum extent feasible. As a result, the design of the subdivision is not likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat and this finding can be made.

- f. **The design of the subdivision or type of improvements is likely to cause serious public health problems.**

The proposed subdivision has been designed to minimize the potential to cause serious public health problems. As discussed in Section 6.2 of the staff report dated January 5, 2017, incorporated herein by reference, adequate water, utilities, and access are available to serve the proposed parcels. The project site is not located within an area of historic flood hazards and has been reviewed by the County Fire Department, Flood Control District, Environmental Health Services, and Air Pollution Control District. There are no identified or likely public health problems or hazards associated with the project. Therefore, this finding can be made.

- g. **The design of the subdivision or the type of improvements will conflict with easements, acquired by the public at large, for access through or use of, property within the proposed subdivision.**

The project will not conflict with any public easements and there is no public use of the project site. Therefore, this finding can be made.

4. **State Government Code §66474.4. The legislative body of a city or county shall deny approval of a tentative map, or parcel map for which a tentative map was not required, if it finds that either the resulting lots following a subdivision of that land would be too small to sustain their agricultural use or the subdivision will result in residential development not incidental to the commercial agricultural use of the land, and if the legislative body finds that the land is subject to any of the following:**

- (a) **A contract entered into pursuant to the California Land Conservation Act of 1965 (Chapter 7 (commencing with Section 51200) of Part 1 of Division 1 of Title 5), including an easement entered into pursuant to Section 51256.**

The project site is not subject to a contract entered into pursuant to the California Land Conservation Act of 1995, or any easements entered into pursuant to Section 51256.

- (b) **An open-space easement entered into pursuant to the Open-Space Easement Act of 1974 (Chapter 6.6 (commencing with Section 51070) of Part 1 of Division 1 of Title 5).**

The project site is not subject to an existing open space easement entered into pursuant to the Open Space Easement Act of 1974.

(c) An agricultural conservation easement entered into pursuant to Chapter 4 (commencing with Section 10260) of Division 10.2 of the Public Resources Code.

Division 10.2 of the Public Resources Code implements the Agricultural Lands Stewardship Program of 1995; Chapter 4 of this Division specifies the provisions of the Agricultural Conservation Easement. The subject parcel is not subject to an agricultural conservation easement. Therefore, these provisions do not apply.

(d) A conservation easement entered into pursuant to Chapter 4 (commencing with Section 815) of Part 2 of Division 2 of the Civil Code.

Chapter 4 of Part 2 of Division 2 of the Civil Code includes provisions for conservation easements. The subject parcel is not subject to a conservation easement. Therefore, these provisions do not apply.

5. State Government Code §66474.6. The governing body of any local agency shall determine whether discharge of waste from the proposed subdivision into an existing community sewer system would result in violation of existing requirements prescribed by a California Regional Water Quality Control Board pursuant to Division 7 (commencing with §13000) of the Water Code.

As discussed in Section 6.2 of the Planning Commission staff report dated January 5, 2017, incorporated herein by reference, the project site will be served by individual private septic systems that are built in conformance with Environmental Health Services requirements and are consistent with California Regional Water Quality Control Board requirements.

2.3. TENTATIVE MAP FINDINGS (COUNTY CODE CHAPTER 21)

A. The following findings shall be cause for disapproval of a tentative map but the tentative map may nevertheless be approved in spite of the existence of such conditions where circumstances warrant.

1. Easements or rights-of-way along or across proposed county streets which are not expressly subordinated to street widening, realignment, or change of grade by an instrument in writing recorded, or capable of being recorded, in the Office of the County Recorder, provided, however, that the Director of Public Works may approve such easements or rights-of-way without such subordinations. Easements or rights-of-way shall not be granted along or across proposed county streets before filing for record of the final subdivision map by the County Recorder, unless the Director of Public Works shall approve such grants. If the Director of Public Works does not

grant such approvals within fourteen days from the date they were requested, they shall be deemed to have been refused. Appeal from refusal of the Director of Public Works to grant such approvals may be made in writing to the Board of Supervisors, which may overrule the Director of Public Works and grant such requested approvals in whole or in part.

The project does not include any easements or rights-of-way across proposed county streets.

2. Lack of adequate width or improvement of access roads to the property; creation of a landlocked lot or parcel without frontage on a street or other approved ingress and egress from the street.

The proposed subdivision has been designed so that lots resulting from the tentative map will not become landlocked. Roads will be adequately designed for ingress and egress, and have been reviewed by the County Fire Department and Public Works Transportation Division.

3. Cuts or fills having such steep slopes or great heights as to be unsafe under the circumstances or unattractive to view.

The proposed project will require grading for future construction within the RDEs and access roadways and utilities. However, as discussed in the Planning Commission staff report dated January 5, 2017, incorporated herein by reference, the grading quantities will not be excessive because the residential development areas do not contain steep slopes, unstable areas, or flood zones, and the proposed access roadways and utility alignments have been designed to minimize grading while meeting fire safety requirements (i.e., turning radius, roadway slope) for site access.

According to the EIR, portions of three proposed access roads will be visible from Foxen Canyon Road. These access roads and driveways to the proposed lots will add paved features to cultivated farmland and grazing lands on the project site. However, the linear access improvements will not substantially alter the predominant agricultural character of the site as seen from public viewpoints.

The water lines and infrastructure associated with the proposed water system will be located within existing roadways and in areas of the site which do not contain steep slopes. Any excess cut generated from grading activities will be used as additional fill to offset shrinkage and compaction of cut material, or to supplement grades elsewhere on the site. No offsite hauling of excess material is proposed.

4. **Grading or construction work shall not be commenced prior to recordation of the final or parcel map without specific authority granted by and subject to conditions approved by the Board of Supervisors.**

The project is conditioned (Condition No. 46 of Attachment B.1) to not allow grading or construction work to be permitted prior to recordation of the tentative map.

5. **Potential creation of hazard to life or property from floods, fire, or other catastrophe.**

The Tentative Tract Map will not create any hazards to life or property from floods, fire, or other catastrophes. Future development will be required to meet County Fire Department standards for defensible space and water storage for fire suppression purposes. Additionally, the County Flood Control and Fire Departments have reviewed the project and have submitted conditions included in Attachments B.1, and B.2. Further, the areas identified for development are not located within any identified flood zones and setbacks from adjacent creeks and drainages will ensure that life and property are protected from flood hazards.

6. **Nonconformance with any adopted general plan of the County or with any alignment of a state highway officially approved or adopted by the Department of Transportation.**

As discussed in Sections 6.2, and 6.3 of the staff report dated January 5, 2017 incorporated herein by reference, compliance with the project description and required conditions of approval will ensure that the design and improvements of the subdivision and future development are consistent with the County's Comprehensive Plan, and the Land Use Development Code. The Tentative Tract Map would not affect the alignment of a state highway.

7. **Creation of a lot or lots which have a ratio depth to width in excess of 3 to 1.**

The project will not result in lots that have a ratio depth to width in excess of 3 to 1.

8. **Subdivision designs with lots backing up to watercourses.**

The proposed subdivision will not result in lots backing up to watercourses.

B. Pursuant to Chapter 21-8 of the Santa Barbara County Code, a tentative map including tentative parcel map shall not be approved if the decision-maker finds that the map design or improvement of the proposed subdivision is not consistent with this Chapter, the requirements of the State Subdivision Map Act, California Government Code Section 66410 et seq.,

the County's Comprehensive Plan, the applicable zoning ordinance, or other applicable County regulations.

The tentative map was evaluated for consistency with applicable County policies and ordinance requirements in Sections 6.2 and 6.3 of the staff report dated January 5, 2017, herein incorporated by reference. As discussed in these sections, the subdivision and associated infrastructure improvements (as modified by the conditions of approval) are consistent with the County's Comprehensive Plan, Santa Barbara County Land Use and Development Code, and Chapter 21 of the County Code, as well as the requirements of the State Subdivision Map Act. Finding 2.1 above, herein incorporated by reference, discusses the tentative map's consistency with applicable provisions of the State Subdivision Map Act.

REVISED FINDINGS

ATTACHMENT A: FINDINGS

1.0 CEQA FINDINGS

1.1 CEQA Exemption

The Planning Commission finds that the denial of the proposed project (Case Nos. 06TRM-00000-00002/TM 14,709, 16CUP-00000-00030) is exempt from environmental review under the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15270. Please see Attachment B, Notice of Exemption.

2.0 ADMINISTRATIVE FINDINGS

2.1 CONDITIONAL USE PERMIT FINDINGS

Findings required for all Conditional Use Permits. In compliance with Subsection 35.82.060.E.1 of the County Land Use and Development Code, prior to the approval or conditional approval of an application for a Conditional Use Permit or Minor Conditional Use Permit the review authority shall first make all of the findings, as applicable. However, as a result of the recommendation for project denial, only those findings which cannot be made are discussed below.

2.1.4 The proposed project will comply with all applicable requirements of this Development Code and the Comprehensive Plan, including any applicable community or area plan.

As discussed in Section 2.0, Comprehensive Plan Consistency, of the Planning Commission staff memorandum dated May 11, 2017, incorporated herein by reference, the Tentative Tract Map for which the proposed State Small Water System will serve is inconsistent with the Santa Barbara County Comprehensive Plan Agricultural Element. Therefore, the proposed State Small Water System is also not consistent with the Comprehensive Plan and this finding cannot be made.

2.2 TENTATIVE MAP FINDINGS (SUBDIVISION MAP ACT)

- A. Findings for all Tentative Maps. In compliance with the Subdivision Map Act, the review authority shall make the following findings for the Rancho La Laguna Vesting Tentative Tract map, Case No. 06TRM-00000-00002/TM 14,709. However, as a result of the recommendation for project denial, only those findings which cannot be made are discussed below.
- 2. State Government Code §66473.5. No local agency shall approve a tentative map, or a parcel map for which a tentative map was not required, unless the legislative body finds that the proposed subdivision, together with the provisions for its design and improvement is consistent with the general plan required by Article 5 (commencing with §65300) of Chapter 3 of Division 1 or any specific plan adopted pursuant to

Commission staff memorandum dated May 11, 2017, incorporated herein by reference, the proposed project is inconsistent with the Santa Barbara County Comprehensive Plan Agricultural Element. There are no circumstances which warrant approval of the tentative map in spite of the inconsistency with the Comprehensive Plan. Therefore, this finding can be made and the tentative map shall not be approved.

ATTACHMENT G.

AGRICULTURAL PRESERVE ADVISORY COMMITTEE APPROVED MINUTES
Meeting of October 3, 2008
Page 2

ACTION: Emmons moved, seconded by Karamitsos, and carried by a vote of 4 to 0 to find this item consistent with the Uniform Rules.

2. 86-AP-043 Jones Ag Preserve Replacement Contract #2 Santa Ynez
08AGP-00000-00036 Florence Trotter-Cadena, Planner (805) 934-6253

Consider the request of Patricia Beltranena, agent for the owner, Ludlow Westerly LLC, of Case No. 08AGP-00000-00036 regarding a replacement contract for 86-AP-043, which is currently in non-renewal and its consistency with the Uniform Rules. The property is 78.53 acres identified as Assessor's Parcel Number 141-080-011 zoned AG-II-100 with an AC Comprehensive Plan designation located approximately 2,960 feet northeast of the intersection of Happy Canyon Road and Alisos Avenue in the Santa Ynez area, Third Supervisorial District.

ACTION: Emmons moved, seconded by Karamitsos, and carried by a vote of 4 to 0 to continue this item to the November meeting, to allow the applicant to provide additional information on any future plans to plant additional crops or environmental constraints that would not allow this parcel to meet the 50% minimum productive acreage requirement.

3. 75-AP-012 Orp Limited New Ag Preserve Contract Summerland
08AGP-00000-00037 Sarah Clark, Planner (805) 568-2059

Consider the request of Jane Gray, Dudek, agent for the owner, Orp Ltd., of Case No. 08AGP-00000-00037 regarding assumption of the existing Ag Preserve contract 75-AP-012 which is in non-renewal, application for a new Ag Preserve contract for Orp Ltd. and its consistency with the Uniform Rules. The property is 84.51 acres identified as Assessor's Parcel Number 005-080-017, zoned AG-I-20 with an A-I-20 Comprehensive Plan designation located at 370 Ortega Ridge Road in the Summerland area, First Supervisorial District.

ACTION: Emmons moved, seconded by Karamitsos, and carried by a vote of 4 to 0 to find this item consistent with the Uniform Rules.

➤ County Counsel informed the agent that they were seeking a replacement contract.

4. 67-AP-003B Rancho La Laguna Tentative Tract Map Santa Ynez
06TRM-00000-00002 Brian Tetley, Planner (805) 934-6589

Consider the request of Patricia Beltranena, agent for the owners, Charles Roven and Leo A. Hanly, of Case No. 06TRM-00000-00002 regarding the subdivision of an existing lot into 13 lots and its consistency with the Uniform Rules. The property is 3,950.75 acres identified as Assessor's Parcel Numbers 133-080-026, 133-080-036 and 133-080-037 (portion of), zoned AG-II-100 with an AC Comprehensive Plan designation located at the Foxen Canyon Road and Alisos Canyon Road intersections, known as 10550 Foxen Canyon Road in the Santa Ynez area, Third and Fifth Supervisorial District.

ACTION: Emmons moved, seconded by Karamitsos, and carried by a vote of 4 to 0 to find this item consistent with the Uniform Rules.

VI. DISCUSSION ITEMS:

5. Mosby Ag Preserve Contract Los Alamos

Request of Gary and Patrice Mosby for information regarding putting their property in Ag Preserve. The property involves Assessor's Parcel Number 099-020-10, 18 acres currently zoned AG-II-100 with an A-II Comprehensive Plan designation. The property is located 2.1 miles east of Harris Grade on Highway 135, north of Highway 135, in the Los Alamos area, Fourth Supervisorial District.

**Table 4.2-8
Consistency with Agricultural Policies in the
Comprehensive Plan Agricultural Element and Land Use Element**

Policy	Consistency
<p>Comprehensive Plan Land Use Element Regional Goal - Agriculture: In rural areas, cultivated agriculture shall be preserved and, where conditions allow, expansion and intensification should be supported. Lands with both prime and non-prime soils shall be reserved for agricultural uses.</p>	<p><u>Consistent</u> The results of the Weighted Point System (WPS) scores (with each lot scoring above the 60-point threshold) indicate that all of the newly created parcels would be agriculturally viable. The proposed access roads, RDEs, and infrastructure would be located in areas of the site which contain both prime and non-prime soils. However, proposed access roads and driveways would follow existing agricultural roads, and RDEs would not be located in areas which contain cultivated agriculture. Any future widening of access roads, or future development onsite would be subject to applicable mitigation measures. The proposed project improvements would not result in a disruption of onsite agricultural operations since future residential development on the newly created parcels would be confined to RDEs (77.3 acres), leaving approximately 3,856.4 acres of land (excluding access roads and driveways) available for agricultural uses (97% of the site). The existing agricultural uses on the subject parcel would remain, and there would be adequate area available for the expansion and intensification of onsite agricultural uses on each of the newly created parcels. In addition, based on compliance with existing zoning regulations and future Williamson Act contracts on Lots 9 through 13, the project would not convert agricultural land to non-agricultural use. Therefore, the project would be consistent with this policy.</p>
<p>Policy I.A: The integrity of agricultural operations shall not be violated by recreational or other non-compatible uses.</p>	<p><u>Consistent</u> Future development within the RDEs would not include recreational or other non-compatible uses. As described in Impact AG-1, the project would not significantly impair the long-term agricultural suitability and productivity of the project site, based on application of the County's adopted weighted point system and other site-specific considerations. Further, as described in Impact AG-3, compliance with the County's Right-to-Farm Ordinance and Uniform Rules would ensure that impacts related to conflicts between residences and agricultural operations remain less than significant. Therefore, the project would be consistent with this policy.</p>
<p>Policy I.D. The use of the Williamson Act (Agricultural Preserve Program) shall be strongly encouraged and supported. The County shall also explore and support other agricultural land protection programs.</p>	<p><u>Consistent</u> The project site is currently under a Williamson Act Contract. However, a request for non-renewal was accepted by the Santa Barbara County Board of Supervisors on November 1, 2006, and became effective on December 31, 2006. The Williamson Act contract for the property therefore ends on December 31, 2016. The Williamson Act contract for the project site expired on December 31, 2015. The applicant proposes new Williamson Act contracts for five of the 13 lots (Lots 9 through 13) prior to recordation of the proposed subdivision map. For Lots 1 through 8, the future lot</p>

**Table 4.2-8
Consistency with Agricultural Policies in the
Comprehensive Plan Agricultural Element and Land Use Element**

Policy	Consistency
	owners would be responsible for determining whether to enter into a Williamson Act contract. Because the project would not discourage enrollment in the Williamson Act, the project would be consistent with this policy.
Policy II.D. Conversion of highly productive agricultural lands whether urban or rural, shall be discouraged. The County shall support programs which encourage the retention of highly productive agricultural lands.	Consistent As described above, the project would not convert prime agricultural land to non-agricultural use based on the WPS scores (with each lot scoring above the 60-point threshold). In addition, based on compliance with existing zoning regulations and future Williamson Act contracts, where applicable (as described below), the project would not convert agricultural land to non-agricultural use. Further, the potential conversion of grazing land or crop land to higher yield crops would not impair agricultural land productivity, and may actually increase productivity. Therefore, the project would be consistent with this policy.
Policy III.A. Expansion of urban development into active agricultural areas outside of urban limits is to be discouraged, as long as infill development is available	Consistent The project site is located in a rural area. The proposed subdivision and future residential development of the site would not be considered an urban use. As defined in the Land Use Element, (residential) urban development is defined as residential development at a density higher than one unit per five gross acres. The project would allow development of one unit on each lot, and the lot sizes range from 160 acres to 605 acres. Therefore, the project would not introduce urban development into an active agricultural area, consistent with this policy.
Land Use Goal 3: Agriculture: In the rural areas, cultivated agriculture shall be preserved and, where conditions allow, expansion and intensification should be supported.	Consistent As described above, the project would not convert agricultural land to non-agricultural use based on the WPS scores (with each lot scoring above the 60-point threshold). In addition, based on compliance with existing zoning regulations and future Williamson Act contracts, where applicable (as described below), the project would not convert agricultural land to non-agricultural use. The project would allow for development of one single family residence on each proposed lot, retaining the majority of each lot in agriculture. Therefore, the project would be consistent with this policy.
Agricultural Commercial Designation: This category is for commercially farmed, privately owned land located within either Rural, Inner-Rural, Existing Developed Rural Neighborhoods or Urban Areas which meets the following criteria: 1. The land is subject to a Williamson Act Contract, including contracts that have been non-renewed or, 2. Parcels forty (40) acres or greater, whether or not currently being used for agricultural purposes, but otherwise eligible for Williamson Act Contract may be included if they meet requirements of Uniform Rule No.6. This category includes compatible land uses and land	Consistent The project site is currently designated Agricultural Commercial, and this designation would remain after implementation of the project. As described above, the project site was under a Williamson Act contract which expired on December 31, 2015. The applicant proposes new Williamson Act contracts for five of the 13 lots (Lots 9 through 13) prior to recordation of the proposed subdivision map. The remaining lots would be eligible for Williamson Act contract, and all 13 lots would be greater than 40 acres. The project would allow for the development of one single family residence on each lot. According to the Uniform Rules, a single-family dwelling is a compatible use. Therefore, the project would be consistent with the existing Comprehensive Plan

**Table 4.2-8
Consistency with Agricultural Policies in the
Comprehensive Plan Agricultural Element and Land Use Element**

Policy	Consistency
uses that are necessary and a part of the agricultural operations. All types of crops and livestock are included. Both "prime" and "non-prime" soils (as defined in the Williamson Act and the County's Uniform Rule No.6) and irrigated and non-irrigated lands are included. Parcels which are smaller than forty (40) acres in size at the time of adoption of this Element may be eligible for the AC designation if they are "prime" or "super-prime" as defined by the County Uniform Rules and are eligible for agricultural preserve status.	designation of Agricultural Commercial.

Source: Santa Barbara County, Planning and Development, republished May 2009.

The project site is zoned AG-II-100 under the County's LUDC. The intent of the AG-II zone is to preserve these lands for long-term agricultural use. The AG-II zone also includes a minimum gross lot area designation that limits the subdivision potential of land and in some cases affects the range of allowable land uses. The proposed new lots would each retain the AG-II-100 zoning designation. Consistent with this zoning, each lot would be greater than 100 acres in size. In addition, the AG-II zone allows for the construction of a one-family dwelling. Therefore, the subdivision of the project site and future development within the RDEs would not conflict with existing agricultural zoning. In addition, as described under Discontinued Agricultural Use above, future non-agricultural development would not be allowed in accordance with the zoning of each lot (AG-II-100).

- *Viability of Continued or Intensified Agricultural Operations.* In February 2010, Rincon Corporation performed a review of the property for the purpose of understanding the viability of continued or intensified agricultural operations for the 13 proposed parcels (Rincon Corporation, February 2010; refer to Appendix B). According to the report, Lots 1 through 8 provide sufficient plantable vineyard ground for a commercially viable winery operation, or could provide commercially viable prime farming. Parcels 9 through 13 are larger parcels, allowing for continued cattle grazing as well as prime production of row crops, orchards, or vineyards. All 13 parcels could continue to be agriculturally viable, and may allow for intensification of agriculture.
- *Conflicts with Williamson Act Contracts.* The Williamson Act contract for the project site expired on December 31, 2015. The applicant proposes new contracts for proposed Lots 9 through 13. For Lots 1 through 8, the future lot owners would be responsible for determining whether to enter into a Williamson Act contract. All 13 proposed lots were reviewed on October 3, 2008 by the Agricultural Preserve Advisory Committee and found to be consistent with the Uniform Rules. All proposed lots are therefore eligible for agricultural preserve contracts and the applicant has agreed, and will be required as a condition of project approval, to apply for the replacement contracts for Lots 9 through 13 prior to recordation of the proposed subdivision map. Future lot owners of Lots 1 through 8 may also elect to enter into a Williamson Act contract. Pursuant to application for replacement contracts, and compliance with the Uniform Rules (as discussed under



SAGE
Associates

AGRICULTURAL AND ENVIRONMENTAL CONSULTANTS

Offices in
Santa Barbara
Mammoth Lakes

RANCHO LA LAGUNA

AGRICULTURAL VIABILITY STUDY

AND

RANGELAND ASSESSMENT



Prepared for:

MNS Engineers, Inc.
201 Industrial Way
Buellton, CA 93427
September 2007

Introduction

An Agricultural Viability Study and Rangeland Assessment were prepared to determine the agricultural viability of cropland and the sustainable moderate level of cattle grazing carrying capacity for the existing 3,934-acre Rancho La Laguna and thirteen proposed lots at the request of Ms. Tish Beltranena, Principal Planner for MNS Engineers, Inc. The ranch agricultural acreage is net and excludes the Foxen Canyon Road and Zaca Road right-of-ways that would preclude agricultural uses.

The following methodology for this agricultural viability study and rangeland assessment were prepared by Sage Associates to be consistent with the County of Santa Barbara Planning & Development Department Environmental Thresholds and Guidelines Manual revised October 2002 with Replacement Pages July 2003, the Natural Resource Conservation Service (USDA NRCS) Soil Survey, The California Department of Conservation Important Farmlands Mapping Program, and the University of California/Santa Barbara County Cooperative Extension (UCCE) published grazing performance standards.

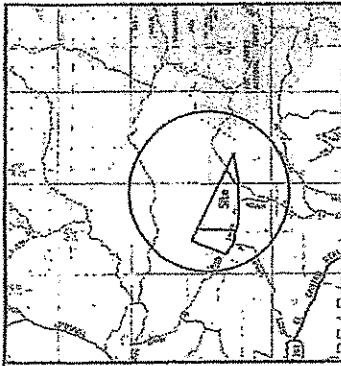
Rancho La Laguna is located northeast of the community of Los Alamos and northeast of the intersection of Aliso Canyon Road and Foxen Canyon Road in the northern part of Santa Barbara County (Figure 1 Vicinity Map). Figure 2 shows a Topographical Map of the ranch area, and Figure 3 shows a Proposed Lot Map of the ranch boundaries and each of the 13 proposed lots.

Specifically, the County of Santa Barbara Planning & Development Department Environmental Thresholds and Guidelines Manual revised October 2002 with Replacement pages July 2003, for agricultural resources states the following:

"The weighted point system is utilized to assign relative values to particular characteristics of a site's agricultural productivity (e.g. soil type, water supply, etc.). Where the points from the following formula total 60 or more, the following types of projects will be considered to have a potentially significant impact:

- A division of land (including Parcel and Tract Maps, etc.) which is currently considered viable but would result in parcels which would not be considered viable using the weighting system."

"As a general guideline, an agricultural parcel of land should be considered viable if it is of sufficient size and capability to support an agricultural enterprise independent of any other parcel. To qualify as agriculturally viable, the area of land in question need only be of sufficient size and/or productive capability to be economically attractive to an agricultural lessee. This productivity standard should take into consideration the cultural practices and leasehold production units in the area, as well as soil type and water availability. For dry land farming and grazing operations the production or carrying capacity should be based upon normal rainfall years only, not periods of drought or heavy rainfall. It should be noted that the Santa Barbara County Cattlemen's Association has stated that an appropriate threshold for impacts to grazing land in the County is the displacement or division of land capable of sustaining between 25 to 30 animal units per



VICINITY MAP
NOT TO SCALE

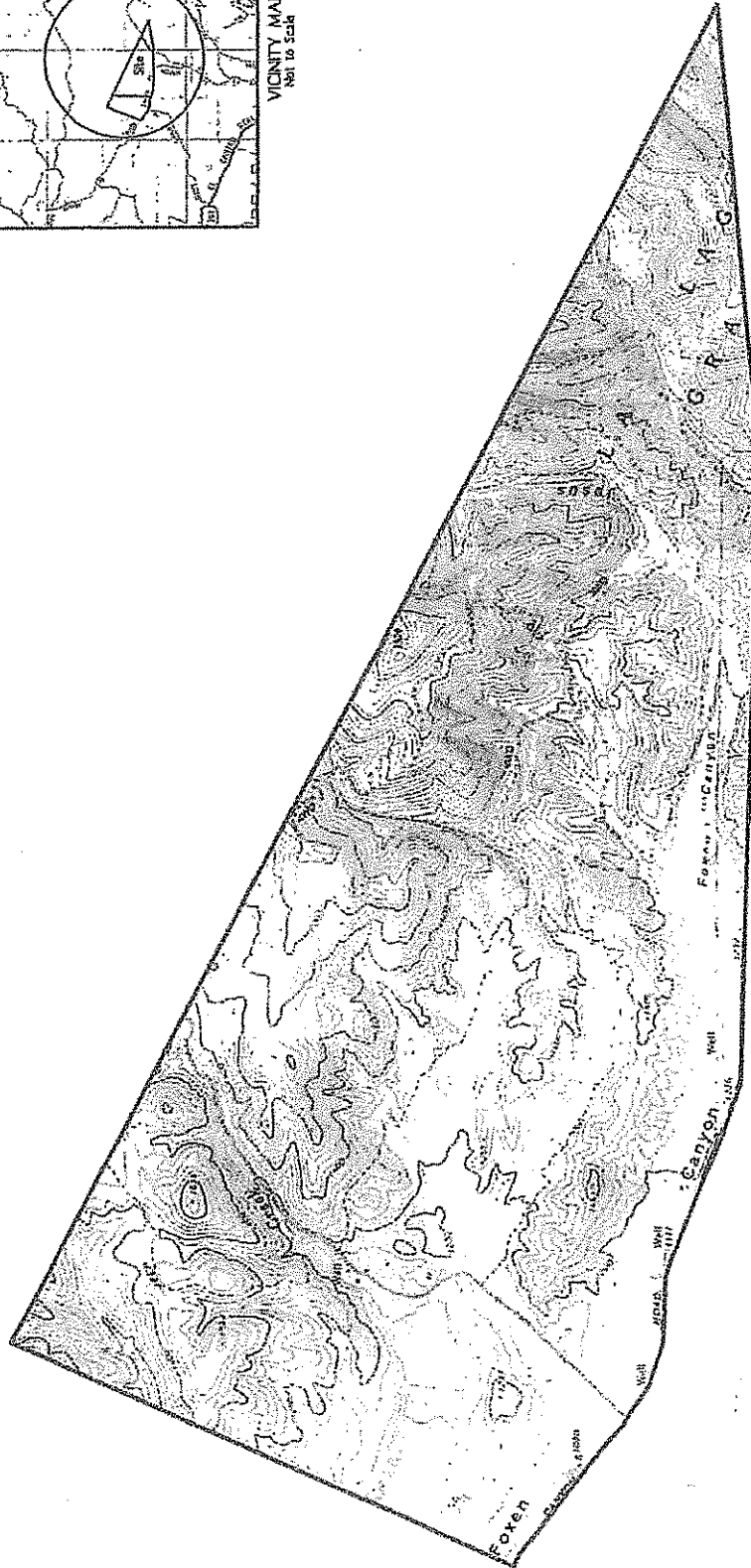


Figure 2:

Topographical Map

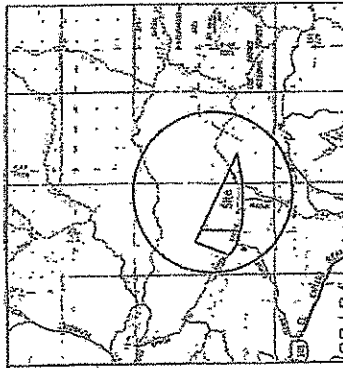
RANCHO LA LAGUNA
APN's 133-080-026, 133-080-036 & 133-080-037
In the County of Santa Barbara, California

March 2007 *



SCALE: 1" = 200'

AVINS ENGINEERS • SURVEYORS • CONSTRUCTION MANAGERS
Quality Infrastructure Services
181 N. MICHIGAN WAY, SUITE 100, RICHMOND, CA 94804
TEL: 415.752.7000 FAX: 415.752.7001



VICINITY MAP
Not to Scale



EXISTING CULTIVATED FIELDS/PRIME AGRICULTURAL

POTENTIAL PRIME AGRICULTURAL

Figure 3:

Proposed Lot Map

RANCHO LA LAGUNA
APN's 133-080-025, 133-080-036 & 133-080-037
In the County of Santa Barbara, California

August 2007



SCALE: 1" = 200'

MINES ENGINEERS • SURVEYORS • COMMUNICATION MANAGERS
Quality Infrastructure Services
21100 WILSON AVENUE, SUITE 100, SANTA BARBARA, CA 93107
TEL: (805) 964-5555 FAX: (805) 964-5448
13370-025 • 13370-036 • 13370-037 • M.S. • C-760

year. This "threshold" utilizes a carrying capacity threshold similar to the weighting system below. Because of this, on grazing projects, detailed information of the number of animal units supportable on a particular parcel should also be considered in the project's environmental document."

The agricultural viability of Rancho La Laguna was determined by assessing the site's agricultural suitability characteristics and completing the county's weighted point system where 60 or more points qualifies as being agriculturally viable.

Therefore, if the existing ranch has a point total of 60 or greater, and if subsequent proposed lots each have point totals above 60, then, the environmental impact to agricultural resources should be above the threshold of significance and the parcelizations should not have a potentially significant effect.

The sustainable cattle grazing carrying capacities of Rancho La Laguna were also determined and were then compared to the Santa Barbara County Thresholds of Significance of 25 to 30 animal units per year as being an operationally viable grazing unit, although the carrying capacity is ancillary to the cropland agricultural viability.

Methodology

The following methodology was utilized for the preparation of this agricultural viability study and rangeland assessment.

- A Proposed Lot Map, aerial photograph, and topographic map prepared by MNS Engineers Inc. was reviewed and a U.S. Geological Survey topographic base map was prepared for the site assessment.
- Existing U.C. Cooperative Extension range management literature and Natural Resources Conservation Service (Soil Conservation Service) Soil Survey data were reviewed.
- An NRCS Soils Survey map, and a soils agricultural characteristics table of the property were prepared for the existing ranch and the proposed 13 lots.
- An agricultural viability cropland assessment and a rangeland assessment were made in March and August of 2007 based on existing published NRCS Soil Survey characteristics and Range Site information and from a field evaluation of the suitability of the cropland and grazing areas.
- The agricultural and cattle grazing suitabilities of the ranch were determined, suitability areas were mapped, and specific acreages were then electronically planimeted.
- The cropland suitability and cattle carrying capacities of the ranch and of the 13 proposed lots were then calculated based on a combination of factors

including existing agricultural uses, potential cropland uses, soil types, slope, canopy cover, range condition, livestock water availability, cattle grazing distribution, fencing, erosion, available dry forage and animal unit forage consumption.

- The ranch manager and owner representative were interviewed to determine the agricultural uses and cattle grazing history and historical carrying capacity of the property.
- The agricultural suitability and the average year sustainable cattle grazing carrying capacity at a moderate level of grazing was then calculated for the overall ranch and the 13 proposed lots based on the above factors.
- The agricultural viability point sheet was completed for the existing ranch and the 13 proposed lots and compared to the 60 point threshold table. The ancillary cattle grazing carrying capacity was then compared to the Santa Barbara County Thresholds of Significance of 25 to 30 animal units per year and a determination was made regarding the significance of the operational viability of the existing ranch in its current condition.

Representative Rancho Photos

Figure 4 shows the representative photo point locations of 30 photos taken of the 13 proposed lots agricultural uses and includes the following.

Photo 1: Proposed Lot #1 cropland, rangeland, and riparian corridor. March 1, 2007.

Photo 2: Proposed Lot #1 cropland, fencing, and access. March 1, 2007.

Photo 3: Proposed Lot #2 cropland and rangeland. March 1, 2007.

Photo 4: Proposed Lot #3 cropland and rangeland. March 1, 2007.

Photo 5: Proposed Lot #4 cropland and rangeland in the foreground. March 1, 2007.

Photo 6: Proposed Lot #4 cropland and rangeland in the foreground. March 1, 2007.

Photo 7: Proposed Lot #5 cropland and rangeland in the foreground. March 1, 2007.

Photo 8: Proposed Lot #5 cropland and rangeland in the foreground. March 1, 2007.

Photo 9: Proposed Lot #6 cropland and rangeland in the foreground. March 1, 2007.

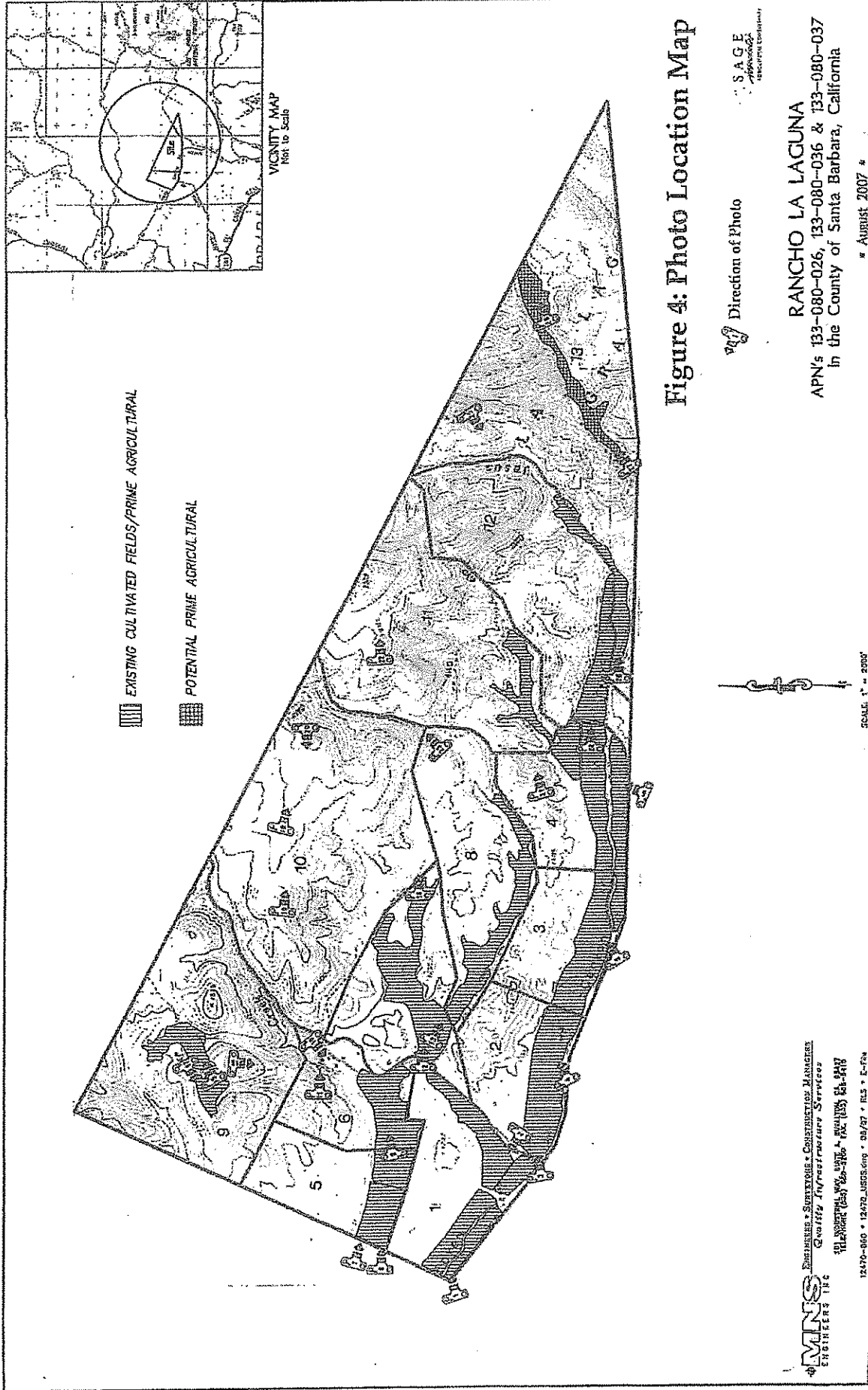


Photo 10: Proposed Lot #6 corrals and barn in the foreground. March 1, 2007.

Photo 11: Proposed Lot #7 rangeland in the foreground. March 1, 2007.

Photo 12: Proposed Lot #7 cropland, rangeland and access in the foreground with Proposed Lot #10 rangeland in the foreground. March 1, 2007.

Photo 13: Proposed Lot #8 cropland clearing in the foreground. March 1, 2007. The ball and chain is a common technique for brush clearing.

Photo 14: Proposed Lot #8 cropland, rangeland and access in the foreground. March 1, 2007.

Photo 15: Proposed Lot #9 rangeland in the foreground. March 1, 2007.

Photo 15A: Proposed Lot #9 rangeland that has been converted to irrigated cropland in the foreground. August 31, 2007. Photo was taken in the same location as Photo 15.

Photo 16: Proposed Lot #9 brushland in the foreground. March 1, 2007.

Photo 16A: Proposed Lot #9 cleared brushland and irrigated cropland pipeline installation. August 31, 2007. Photo was taken in the same location as Photo 16.

Photo 17: Proposed Lot #9 brushland/rangeland that was converted to irrigated cropland in the foreground. August 31, 2007.

Photo 18: Proposed Lot #10 rangeland. March 1, 2007.

Photo 19: Proposed Lot #10 rangeland and possible future cropland. March 1, 2007.

Photo 20: Proposed Lot #10 rangeland and possible future cropland. March 1, 2007.

Photo 21: Proposed Lot #11 rangeland after controlled prescribed burn with irrigated cropland to the right of photo. March 1, 2007.

Photo 22: Proposed Lot #11 rangeland and possible future cropland. Note the landslide in the background. March 1, 2007.

Photo 23: Proposed Lots #8, #10, and #11 juncture rangeland after controlled prescribed burn with abundant purple needlegrass. August 31, 2007.

Photo 24: Proposed Lot #12 cropland and rangeland in the foreground along with a water trough and fencing. Proposed Lot #4 cropland is in the immediate foreground. March 1, 2007.

Photo 25: Proposed Lot #12 cropland lower right, and proposed Lot #13 rangeland in the foreground. March 1, 2007.

Photo 26: Proposed Lot #13 cropland and rangeland. August 31, 2007.

Photo 27: Proposed Lot #13 rangeland and potential future cropland exclusive of the oaks. March 1, 2007.

Photo 28: Proposed Lot #13 rangeland and potential future cropland exclusive of the oaks. March 1, 2007.

Ranch Manager and Owner Representative Interview

The agricultural use information on Rancho La Laguna was provided via a site visit with Mr. Martin Burciaga-ranch manager, Ms. Tish Beltranena-owner representative with MNS Engineers, Inc., and from the Tentative Tract Map - TRM 14,709 supplied by MNS Engineers, Inc. Salient points include the following:

- Approximately 3,934 acres (includes crop stubble that may be grazed) of Rancho La Laguna are currently grazed year around by 160 to 180 mother cow/ calf pairs, 20 replacement heifers, and eight bulls. This equates to about 194 to 204 animal units per year of grazing animals.
- Approximately 563 acres of cultivated farmland of the 3,934-acre Rancho La Laguna is currently leased and includes a rotation of various irrigated row crops and dryland hay/ grain crops. Row crops have included tomatoes, snow peas, onions, peppers, tomatillos, Serrano chilies, bell peppers, and lettuce.
- Farmland has been mostly fenced from surrounding grazing land.
- Many of the proposed lot lines are fenced.
- Residential Development Envelopes are not fenced at this time.
- Residential Development Envelope driveways emanate from existing ranch roads.
- All proposed lots will have water for irrigated crops and livestock.
- The proposed lots include the following:
 - #1 - 208 acres of which approximately 75 acres are in irrigated cultivation, and 18 acres are dryland farmed for hay and grain and includes one water well and two water troughs.
 - #2 - 178 acres of which approximately 60 acres are in irrigated cultivation and includes four water wells and three water troughs.

RANCHO LA LAGUNA PHOTOS



PHOTO 1: Proposed Lot #1 cropland, rangeland, and riparian corridor. March 1, 2007.

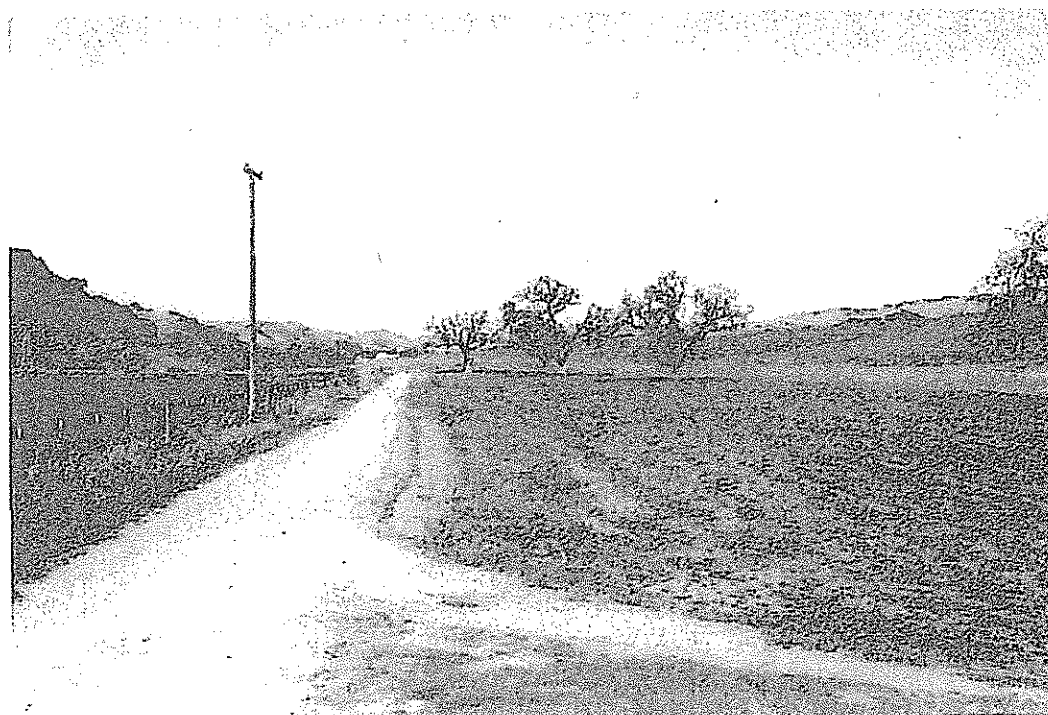


PHOTO 2: Proposed Lot #1 cropland and access. March 1, 2007.

RANCHO LA LAGUNA PHOTOS



PHOTO 3: Proposed Lot #2 cropland and rangeland. March 1, 2007.



PHOTO 4: Proposed Lot #3 cropland and rangeland. March 1, 2007.

RANCHO LA LAGUNA PHOTOS



PHOTO 5: Proposed Lot #4 cropland and rangeland, foreground. March 1, 2007.



PHOTO 6: Proposed Lot #4 cropland and rangeland, foreground. March 1, 2007.

RANCHO LA LAGUNA PHOTOS



PHOTO 7: Proposed Lot #5 cropland and rangeland, foreground. March 1, 2007.



PHOTO 8: Proposed Lot #5 cropland and rangeland, foreground. March 1, 2007.

RANCHO LA LAGUNA PHOTOS



PHOTO 9: Proposed Lot #6 cropland and rangeland, foreground. March 1, 2007.



PHOTO 10: Proposed Lot #6 corrals, and barn, foreground. March 1, 2007.

RANCHO LA LAGUNA PHOTOS



PHOTO 11: Proposed Lot #7 rangeland, foreground. March 1, 2007.



PHOTO 12: Proposed Lot #7 cropland, rangeland and access, foreground. Proposed Lot #10 rangeland, background. March 1, 2007.

RANCHO LA LAGUNA PHOTOS



PHOTO 13: Proposed Lot #8 cropland clearing, foreground, March 1, 2007.



PHOTO 14: Proposed Lot #8 cropland, rangeland and access, foreground, March 1, 2007.

RANCHO LA LAGUNA PHOTOS



PHOTO 15: Proposed Lot #9 rangeland, foreground. March 1, 2007.



PHOTO 15A: Proposed Lot #9 rangeland converted to irrigated cropland, foreground. August 31, 2007.

RANCHO LA LAGUNA PHOTOS



PHOTO 16: Proposed Lot #9 brushland, foreground. March 1, 2007.



PHOTO 16A: Proposed Lot #9 cleared brushland and irrigated cropland pipeline installation, foreground. August 31, 2007.

SAGE Associates

RANCHO LA LAGUNA PHOTOS



PHOTO 17: Proposed Lot #9 brushland/rangeland converted to irrigated cropland, foreground. March 1, 2007.



PHOTO 18: Proposed Lot #10 rangeland. March 1, 2007.

RANCHO LA LAGUNA PHOTOS



PHOTO 19: Proposed Lot #10 rangeland. March 1, 2007.



PHOTO 20: Proposed Lot #10 rangeland, foreground. March 1, 2007.

RANCHO LA LAGUNA PHOTOS



PHOTO 21: Proposed Lot #11 rangeland after controlled, prescribed burn with irrigated cropland to the right. March 1, 2007.

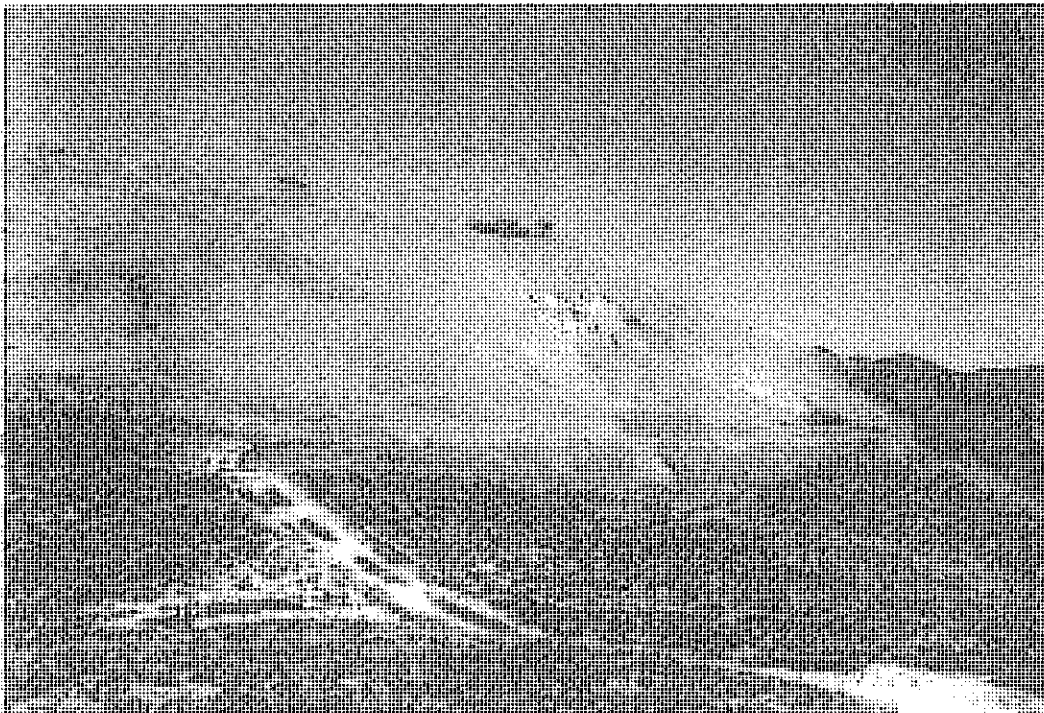


PHOTO 22: Proposed Lot #11 rangeland. March 1, 2007.

RANCHO LA LAGUNA PHOTOS

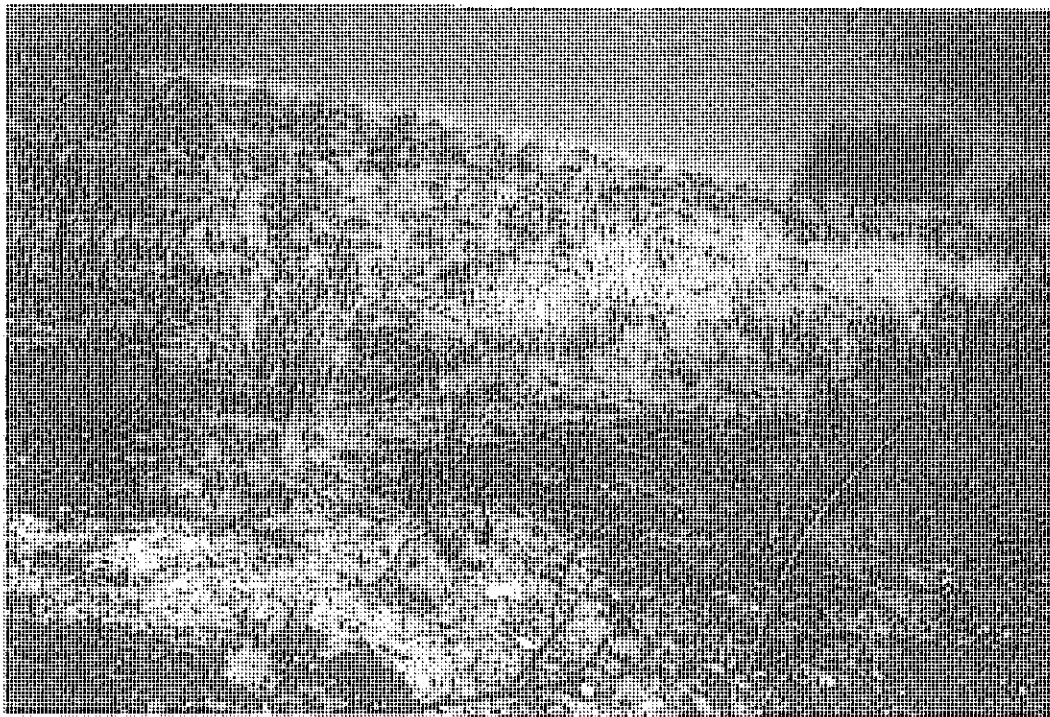


PHOTO 23: Proposed Lots #8, #10, and #11 juncture rangeland after controlled prescribed burn with abundant purple needlegrass. August 31, 2007.

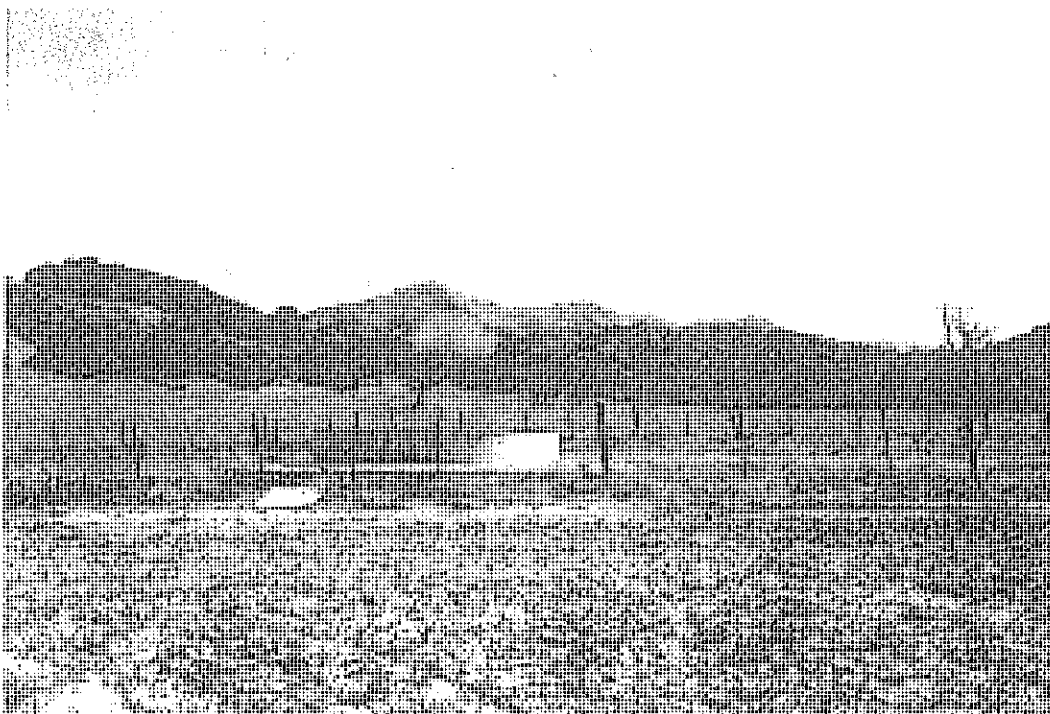


PHOTO 24: Proposed Lot #12 cropland and rangeland, foreground. March 1, 2007.

RANCHO LA LAGUNA PHOTOS



PHOTO 25: Proposed Lot #12 cropland lower right, and proposed Lot 13 rangeland, foreground. March 1, 2007.



PHOTO 26: Proposed Lot #13 cropland and rangeland. August 31, 2007.

RANCHO LA LAGUNA PHOTOS



PHOTO 27: Proposed Lot #13 rangeland and potential cropland, exclusive of oaks. March 1, 2007.



PHOTO 28: Proposed Lot #13 rangeland and potential cropland exclusive of oaks. March 1, 2007.

#3 – 147 acres of which approximately 48 acres are in cultivation and includes one water well and one water trough.

#4 – 191 acres of which approximately 81 acres are in irrigated cultivation and includes three water wells and two water troughs.

#5 – 152 acres of which approximately 40 acres are in irrigated cultivation and includes one water well and two water troughs.

#6 – 143 acres of which approximately 38 acres are in irrigated cultivation and includes one water well and two water troughs.

#7 – 213 acres of which approximately 65 acres are in irrigated cultivation and includes one water reservoir, shared well, and four water troughs.

#8 – 259 acres of which approximately 49 acres are in irrigated cultivation and includes one water well, a pond, and four water troughs.

#9 – 450 acres of which approximately 29 acres are in irrigated cultivation and includes shared water well, three water troughs, and livestock water along Asphaltum Creek.

#10 – 595 acres with no land in cultivation and includes shared water well and three water troughs, a pond, and livestock water along Asphaltum Creek.

#11 429 acres with approximately 20 acres in irrigated cultivation and includes shared water well, and two water troughs.

#12 – 369 acres with approximately 39 acres in irrigated cultivation and includes two water wells, a pond, and three water troughs.

#13 – 601 acres with approximately 19 acres in irrigated cultivation with potential cultivated land and includes shared water well and livestock water from Zaca Creek.

- Rancho La Laguna is under a Land Conservation Act contract with Santa Barbara County. It is the intent of the applicant for the lots to remain under Land Conservation Act contract or possibly establish conservation easements.

- Brush crushing with a bulldozer and ball and chain, and a 600-acre controlled prescribed burn has occurred recently that has improved the carrying capacity on the less steep upland areas of proposed Lots #8, #10, and #11.

Agricultural Suitability and Cattle Grazing Suitability

The agricultural cropland suitability and the cattle grazing suitability of the ranch were evaluated by first reviewing and summarizing the soil agricultural characteristics for baseline data, followed by a field evaluation of the cropland

areas, potential and possible cropland areas, topography, canopy cover, range condition of palatable forage, livestock water, cattle grazing distribution, fencing, and site erosion. The potential future cropland areas were suggested by the applicant representative and were reviewed. The possible future cropland areas were identified in the Sage Associates field assessments.

From the above evaluations, the agricultural suitability and the cattle grazing suitability were determined. The available dry forage was estimated per soil type acreage from Soil Survey forage production estimates, the total site estimated dry forage was computed and the cattle grazing carrying capacity was also calculated both for the proposed entire lot and then only for the rangeland areas of the lot exclusive of the cropland. The carrying capacities are hence given a high and low range of values.

A cattle grazing and agricultural suitability map was prepared showing the suitability of rangeland and cropland areas.

Lastly, the agricultural suitability point table was prepared to determine potential significant impacts of the proposed lots based on the Santa Barbara County Thresholds of Significance.

A. Soil Agricultural Characteristics

The U. S. Department of Agriculture Soil Survey for the Northern Santa Barbara County Area (1972) and the Soil Survey Errata (1981) were reviewed and a Soil Agricultural Characteristics Table was prepared for the existing ranch and the 13 proposed lots (Table 1). A USDA Soils Survey Map was prepared and soil type acreages were then planimetered for the existing ranch and the 13 proposed lots. See Table 1 and Figure 5, respectively. Soil series and soil type have the same meaning in this assessment. Rangeland and grazing land also have the same meaning. Average rainfall for these soil locations in the Foxen Canyon area is about 20 inches (USDA, 1981). About one half of normal rainfall occurred in the 2006-2007 rainfall season.

Table 1 – Soil Agricultural Characteristics that provides baseline information, can be read by column as follows. See the first Soil Series (soil type) listed as an example.

Column 1: ArD is the respective Soil Series symbol used on the NRCS Soils Survey Map (Figure 5).

Column 2: Arnold is the soil name given by the NRCS to this particular Soil Series.

Column 3: Sand is the soil texture.

Column 4: The soil is located on average slopes of five to 15 percent on landforms consisting of low hills and ridgetops as determined by the USDA NRCS mapping.

TABLE 1: RANCHO LA LAGUNA SOIL AGRICULTURAL CHARACTERISTICS

MAP SYM.	SOIL NAME	TEXTURE	USDA AVERAGE SLOPE % and Landform	CAPABILITY CLASS Irrigated/ Non-Irrigated STORE INDEX	RANCH ACRES ER PL#	RANGE SITE	RANGELAND DRY MATTER PRODUCTIVITY Favorable Year Average Year Unfavorable Year (pounds/acre)	ESTIMATED RESIDUAL DRY MATTER* For USDA AVERAGE SLOPE (pounds/acre)	ESTIMATED AVAILABLE DRY MATTER Favorable Year Average Year Unfavorable Year (pounds/acre)	EROSION/ HAZARD/ SURFACE RUNOFF	REGIONAL AGRICULTURAL USAGE	SOIL AG USAGE	IMPORTANT FARMLANDS DESIGNATION
ArD	Arnold	sand	5 to 15% low hills ridgeslope	IV/VII 20	44ER 44PL9	Sandy	1,200 750 300	400 400 400	800 350 0	moderate/ medium	range, grapes	grazing	Grading, Local Importance
ArF3	Arnold	sand	9 to 45% low hills	VII/VII 15	18ER 4PL1 9PL11 60PL12 111PL13	Shallow Sandy	1,200 750 300	600 600 600	600 150 0	high/ rapid	limited range	grazing	Grazing
BoA	Botella	loam	0 to 2% valleys floodplains	I/III 95	47ER 15PL1 26PL5 6PL6	Loamy	2,100 1,550 1,000	400 400 400	1,700 1,150 600	none slow	all crops	row crops, field crops, grazing	Prime

See Next Page

*At a sustainable moderate grazing level in order to prevent erosion and provide adequate ground cover to allow natural revegetation. At a minimum, 100 to 800 pounds per acre of residual dry matter is required depending on slope, canopy cover, and soil characteristics on annual grassland and/or hardwood rangelands. ER = Existing Ranch, PL = Proposed Lobs by applicable number.

Sources: U. S. Department of Agriculture Soil Survey of Northern Santa Barbara County, 1972 and 1981 errata, 1983; California Department of Conservation Important Farmlands Map Santa Barbara County, 1986 and 2002; and University of California Cooperative Extension Guidelines for Residue Management on Annual Ranges, 1982 and 2003; and SAGE Associates field assessments 2007.

TABLE 1: RANCHO LA LAGUNA SOIL AGRICULTURAL CHARACTERISTICS

MAP SYM.	SOIL NAME	TEXTURE	USDA AVERAGE SLOPE % and Landform	CAPABILITY CLASS Irrigated/ Non-Irrigated STORE INDEX	RANCH ACRES ER PL#	RANGE SITE	RANGELAND DRY MATTER PRODUCTIVITY Favorable Year Average Year Unfavorable Year (pounds/acre)	ESTIMATED RESIDUAL DRY MATTER* Per USDA AVERAGE SLOPE (pounds/acre)	ESTIMATED AVAILABLE DRY MATTER Favorable Year Average Year Unfavorable Year (pounds/acre)	EROSION HAZARD/ SURFACE RUNOFF	REGIONAL AGRICULTURAL USAGE	SOIL AG USAGE	IMPORTANT FARMLANDS DESIGNATION
BoD2	Botella	loam	2 to 15% narrow valleys	III/III 45	21ER 21PL13	Loamy	2,100 1,550 1,000	400 400 400	1,700 1,150 600	slight/ slow	all crops	grazing	Local Importance, Grazing
BoC	Botella	clay loam	2 to 9% terraces	II/III 45	13ER 2PL1 11PL5	Clayey	2,500 1,850 1,200	400 400 400	2,100 1,450 800	slight/ slow	all crops	row crops, field crops	Prime
CED	Chamuse plus inclusions from ChG soil	shaly sandy loam	9 to 15% terraces	IV/IV 45	105ER 15PL1 9PL5 9PL6 9PL7 63PL6	Loamy	2,100 1,550 1,000	500 500 500	1,600 1,050 500	moderate/ medium	range, grain	grazing, grain	Grazing
CgC	Chamuse	loam	2 to 9% terraces	III/IV 45	4ER 42PL13	Loamy	2,100 1,550 1,000	400 400 400	1,700 1,150 600	slight/ slow	range, grain	grazing, grain	Grazing

See Next Page

*At a sustainable moderate grazing level in order to prevent erosion and provide adequate ground cover to allow natural rangeland. At a minimum, 100 to 800 pounds per acre of residual dry matter is required depending on slope, canopy cover, and soil characteristics on annual grassland and/or hardwood rangelands. ER = Existing Ranch, PL = Proposed Loss by applicable number.

Sources: U. S. Department of Agriculture Soil Survey of Northern Santa Barbara County, 1972 and 1981 errata, 1989 California Department of Conservation Important Farmlands Map Santa Barbara County, 1986 and 2002; and University of California Cooperative Extension Guidelines for Rangeland Management on Annual Ranges, 1987 and 2003; and SAGE Associates field assessments 2007.

SAGE Associates

TABLE 1: RANCHO LA LAGUNA SOIL AGRICULTURAL CHARACTERISTICS

MAP SYM.	SOIL NAME	TEXTURE	USDA AVERAGE SLOPE % and Landform	CAPABILITY CLASS Irrigated/ Non-irrigated STORIE INDEX	RANCH ACRES ER PL#	RANGE SITE	RANGELAND DRY MATTER PRODUCTIVITY Favorable Year Average Year Unfavorable Year (pounds/acre)	ESTIMATED RESIDUAL DRY MATTER* Per USDA AVERAGE SLOPE (pounds/acre)	ESTIMATED AVAILABLE DRY MATTER Favorable Year Average Year Unfavorable Year (pounds/acre)	EROSION HAZARD/ SURFACE RUNOFF	REGIONAL AGRICULTURAL USAGE	SOIL AG USAGE	IMPORTANT FARMLANDS DESIGNATION
ChD	Chamisa	shaly loam	9 to 15% terraces	IV/IV 43	44ER 19PL2 6PL3 19PL4	Loamy	2,100 1,550 1,000	500 500 500	1,600 1,050 500	moderate/ medium	range, grain	grazing, grapes	Grazing
ChF	Chamisa	shaly loam	15 to 45% dissected terraces	V1/V1 36	86ER 82PL1 77PL2 66PL9 83PL4 36PL5 35PL6 48PL7 62PL8 48PL10 29PL11 17PL12 109PL13	Loamy	2,100 1,550 1,000	600 600 600	1,500 950 400	mod-high/ mod-rapid	range	grazing, grain, grapes	Grazing
ChG	Chamisa	shaly loam	45 to 75% steep slopes of dissected terraces	VII/VII 18	84ER 6PL1 30PL7 92PL3 16PL11	Steep Loamy	1,200 550 500	800 800 800	400 50 500	very high/ very rapid	range, watershed	grazing	Grazing

See Next Page

*At a sustainable moderate grading level in order to prevent erosion and provide adequate ground cover to allow natural revegetation. At a minimum, 100 to 500 pounds per acre of residual dry matter is required depending on slope, canopy cover, and soil characteristics on annual grassland and/or hard wood rangelands. ER = Existing Ranch, PL = Proposed Lots by applicable number.

Sources: U. S. Department of Agriculture Soil Survey of Northern Santa Barbara County, 1972 and 1981; Santa Barbara County, 1985 and 2002; and University of California Cooperative Extension Guidelines for Residue Management on Annual Range, 1992 and 2003; and SAGE Associates field assessments 2007.

SAGE ASSOCIATES

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MAP SYM.	SOIL NAME	TEXTURE	USDA AVERAGE SLOPE % and Landform	CAPABILITY CLASS Irrigated/ Non-Irrigated STORE INDEX	RANCH ACRES ER PL#	RANGE SITE	RANGELAND DRY MATTER PRODUCTIVITY Favorable Year Unfavorable Year (pounds/acre)	ESTIMATED RESIDUAL DRY MATTER* per USDA AVERAGE SLOPE (pounds/acre)	ESTIMATED AVAILABLE DRY MATTER Favorable Year Unfavorable Year (pounds/acre)	EROSION HAZARD/ SURFACE RUNOFF	REGIONAL AGRICULTURAL USAGE	SOIL AG USAGE	IMPORTANT FARMLANDS DESIGNATION
ChG2	Chamisa	shaly loam	30 to 75% ridged side slopes of dissected terraces	VIII/VII 15	4ER 4PL6	Shallow Loamy	800 500 200	800 800 800	0 0 0	high/ very rapid	range, watershed	limited grazing	Grazing
CLF	Chamisa	clay loam	30 to 45% high dissected terraces	VI/VI 27	57ER 57PL11	Clayey	2,500 1,850 1,200	800 900 900	1,700 1,050 400	High/ rapid	range	grazing	Grazing
CuC	Corallitos	loamy sand	2 to 9% sloping fans and valleys	III/IV 58	33ER 12PL1 5PL2 6PL3 10PL7	Sandy	1,200 750 300	400 400 400	800 350 0	slight/ slow	crops, range	crops, grazing, watershed	Prime

See Next Page

*At a sustainable moderate grazing level in order to prevent erosion and provide adequate ground cover to allow natural reseeding. At a minimum, 100 to 800 pounds per acre of residual dry matter is required depending on slope, canopy cover, and soil characteristics on annual grassland and/or hard wood rangelands. ER = Existing Ranch, PL = Proposed Lots by applicable number.

Sources: U.S. Department of Agriculture Soil Survey of Northern Santa Barbara County, 1972 and 1981 Errata, 1982; California Department of Conservation Important Farmlands Map Santa Barbara County, 1955 and 2002; and University of California Cooperative Extension Guidelines for Rangeland Management on Annual Range, 1982 and 2003; and SAGE Associates field assessments 2007.

SAGE Associates

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MAP SYM.	SOIL NAME	TEXTURE	USDA AVERAGE SLOPE % and Landform	CAPABILITY CLASS Irrigated/ Non-Irrigated STORE INDEX	RANCH ACRES ER PL#	RANGE SITE	RANGELAND DRY MATTER PRODUCTIVITY Favorable Year Average Year Unfavorable Year (pounds/acre)	ESTIMATED RESIDUAL DRY MATTER* Per USDA AVERAGE SLOPE (pounds/acre)	ESTIMATED AVAILABLE DRY MATTER Favorable Year Average Year Unfavorable Year (pounds/acre)	EROSION HAZARD/ SURFACE RUNOFF	REGIONAL AGRICULTURAL USAGE	SOIL AG USAGE	IMPORTANT FARMLANDS DESIGNATION
CuD	Corralitos	loamy sand	9 to 15% fans	IV/VI 45	75ER 15PL10	Sandy	1,200 750 300	500 500 900	700 250 0	slight-mod/ slow	range	grazing	Grazing
CwE	Crow Hill inclusions from LnG soil	loam	15 to 30% hills, ridgetops	IV/IV 31	79ER 20PL6 4PL9 39PL10 18PL11 2PL12	Loamy	2,100 1,550 1,000	600 600 600	1,500 950 400	mod.-high/ mod.-rapid	range, hay	grazing	Grazing
CwI	Crow Hill	loam	30 to 45% steep uplands	VI/VI 24	12ER 12PL5	Loamy	2,100 1,550 1,000	800 800 800	1,300 750 200	high rapid	range	grazing	Grazing
EdC2	Elder	sandy loam	2 to 5% fans and narrow valleys	II/III 77	14ER 9PL7 9PL10	Loamy	2,100 1,550 1,000	400 400 400	1,700 1,150 600	moderate/ mod.-slow	crops, range	grazing, crops	Prime
EdD2	Elder	sandy loam	9 to 15% fans and narrow valleys	III/III 56	16ER 7PL2 11PL13	Loamy	2,100 1,550 1,000	500 500 500	1,600 1,050 500	moderate/ medium	range, grain	grazing	Grazing

See Next Page

*At a sustainable moderate grazing level in order to prevent erosion and provide adequate ground cover to allow natural revegetation. At a minimum, 100 to 800 pounds per acre of residual dry matter is required depending on slope, canopy cover, and soil characteristics on annual grassland and/or hardwood rangeland. ER = Existing Rangeland, PL = Proposed Lots by applicable number.

Sources: U. S. Department of Agriculture Soil Survey of Northern Santa Barbara County, 1972 and 1982 errata, 1988 California Department of Conservation Important Farmlands Map Santa Barbara County, 1986 and 2002, and University of California Cooperative Extension Guidelines for Rangeland Management on Annual Rangeland, 1982 and 2003, and SAGE Associates field assessments 2007.

TABLE 1: RANCHO LA LAGUNA SOIL AGRICULTURAL CHARACTERISTICS

MAP SYM.	SOIL NAME	TEXTURE	USDA AVERAGE SLOPE % and Landform	CAPABILITY CLASS Irrigated/ Non-Irrigated STORUS INDEX	RANCH ACRES ER PL#	RANGE SITE	RANGELAND DRY MATTER PRODUCTIVITY Favorable Year Average Year Unfavorable Year (pounds/acre)	ESTIMATED RESIDUAL DRY MATTER* Per USDA AVERAGE SLOPE (pounds/acre)	ESTIMATED AVAILABLE DRY MATTER Favorable Year Average Year Unfavorable Year (pounds/acre)	EROSION HAZARD/ SURFACE RUNOFF	REGIONAL AGRICULTURAL USAGE	SOIL AG USAGE	IMPORTANT FARMLANDS DESIGNATION
EmA	Elder	loam	0 to 2% floodplains	III 100	13ER 13PL5	Loamy	2,192 1,550 1,000	400 400 400	1,700 1,150 600	none/ slight/ very slow	all crops	crops	Prime
EmC	Elder	loam	2 to 9% fans and valleys	II/III 86	401ER 55PL1 70PL2 80PL3 86PL4 1PL5 58PL6 74PL7 70PL9 1PL9 10PL10 2PL11 2PL12 2PL13	Loamy	2,100 1,550 1,000	400 400 400	1,700 1,150 600	slight-med/ slow-med.	all crops	crops, grazing	Prime
EmC2	Elder	loam	2 to 9% valleys, floodplains	II/III 55	55ER 14PL4 9PL9 30PL11 2PL12	Loamy	2,100 1,550 1,000	400 400 400	1,700 1,150 600	moderate/ medium	all crops, range	crops, grazing	Prime

See Next Page

*At a sustainable moderate grazing level in order to prevent erosion and provide adequate ground cover to allow natural reseeding. At a minimum, 100 to 800 pounds per acre of residual dry matter is required depending on slope, canopy cover, and soil characteristics on annual grassland and/or hardwood rangelands. ER = Existing Ranch, PL = Proposed Lots by applicable number.

Sources: U.S. Department of Agriculture Soil Survey of Northern Santa Barbara County, 1972 and 1981 errii, 1983; California Department of Conservation Important Farmlands Map Santa Barbara County, 1986 and 2002; and University of California Cooperative Extension Guidelines for Residue Management on Annual Range, 1982 and 2003; and SAGE Associates field assessments 2007.

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TABLE 1: RANCHO LA LAGUNA SOIL AGRICULTURAL CHARACTERISTICS

MAP SYM.	SOIL NAME	TEXTURE	USDA AVERAGE SLOPE % and Landform	CAPABILITY CLASS Irrigated/ Non-Irrigated STORIE INDEX	RANCH ACRES HR PL#	RANGE SITE	RANGELAND DRY MATTER PRODUCTIVITY Favorable Year Average Year Unfavorable Year (pounds/acre)	ESTIMATED RESIDUAL DRY MATTER* Per USDA AVERAGE SLOPE (pounds/acre)	ESTIMATED AVAILABLE DRY MATTER Favorable Year Average Year Unfavorable Year (pounds/acre)	EROSION HAZARD/ SURFACE RUNOFF	REGIONAL AGRICULTURAL USAGE	SOIL AG USAGE	IMPORTANT FARMLANDS DESIGNATION
Gr	Gazeo	clay loam	30 to 45% hills and mountains	VIII/V 19	173ER 35PL5 25PL6 113PL9	Loamy	2100 1,550 1,000	900 900 800	1,300 750 200	high rapid	range	grazing	Grazing
LkG	Lopez	rocky loam	75 to 100% steep mountains	VIII/VII 6	20ER 20PL13	Not Assigned	<800 <500 <200	800 800 600	0 0 0	very high/ very rapid	watershed	watershed	Grazing
LmG	Lopez see Inclusions Crow Hill and Santa Lucia soils	shaly clay loam loams loams	15 to 75% mountains, ridges, swales	VII/VII 11 IV/IV 31, 25	96ER 9PL5 6PL6 23PL8 206PL9 200PL10 216PL11 30PL12 201PL13	Shallow Loamy to Loamy	2,100-800 1,550-500 1,000-200	400-800 400-800 400-500	0-1,500 0-1,150 0-600	severe/ very rapid moderate/ medium	range, watershed range	grazing, watershed, grazing, hay, grain	Grazing Grazing

See Next Page

*At a sustainable moderate grazing level in order to prevent erosion and provide adequate ground cover to allow natural revegetation. At a minimum, 100 to 800 pounds per acre of residual dry matter is required depending on slope, canopy cover, and soil characteristics on annual grassland and/or hardwood rangelands. ER = Existing Ranch, PL = Proposed Lots by applicable number.

Sources: U. S. Department of Agriculture Soil Survey of Northern Santa Barbara County, 1972 and 1982 errata, 1989; California Department of Conservation Important Farmlands Map Santa Barbara County, 1986 and 2002 and University of California Cooperative Extension Guidelines for Rangeland Management on Annual Range, 1982 and 2003; and SAGE Associates field assessments 2007.

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TABLE 1: RANCHO LA LAGUNA SOIL AGRICULTURAL CHARACTERISTICS

MAP SYM.	SOIL NAME	TEXTURE	USDA AVERAGE SLOPE % and Landform	CAPABILITY CLASS Irrigated/ Non-irrigated STORIE INDEX	RANCH ACRES ER PL#	RANGE SITE	RANGELAND DRY MATTER PRODUCTIVITY Favorable Year Unfavorable Year (pounds/acre)	ESTIMATED RESIDUAL DRY MATTER* Per USDA AVERAGE SLOPE (pounds/acre)	ESTIMATED AVAILABLE DRY MATTER Favorable Year Unfavorable Year (pounds/acre)	EROSION HAZARD/ SURFACE RUNOFF	REGIONAL AGRICULTURAL USAGE	SOIL AG USAGE	IMPORTANT FARMLANDS DESIGNATION
SfD	San Andreas- Tierra	clay loams	5 to 15% low hills and ridgetops	IV/IV 36	33ER 23PL7 10PL9	Loamy/ Claypan	1,700 1,300 900	450 450 450	1,250 950 450	slight-med/ slow-med.	range, hay	grazing	Grazing
SfE	San Andreas- Tierra	clay loams	15 to 30% foothills	VI/VI 29	41ER 20PL7 9PL10 12PL12	Loamy/ Claypan	1,700 1,300 900	600 600 600	1,100 700 300	high/ rapid	range	grazing	Grazing
SfG	San Andreas- Tierra	clay loams	30 to 75% foothills, mountains	VII/VII 16	50ER 50PL9	Steep Loamy/ Claypan	1,250 950 650	800 800 300	450 150 0	severe/ very rapid	range, watershed	grazing, watershed	Grazing
SmE	Santa Lucia inclusions in Lopez soil	shaly clay loam	15 to 30% hills, swales	IV/IV 28	4ER 4PL13	Loamy	2,100 1,550 1,000	600 600 600	1,500 950 400	mod-high/ mod-rapid	range	grazing	Grazing

See Next Page

*At a sustainable moderate grazing level in order to prevent erosion and provide adequate ground cover to allow natural reseeding. At a minimum, 100 to 500 pounds per acre of residual dry matter is required depending on slope, canopy cover, and soil characteristics on annual grassland and/or hardwood rangelands. ER = Existing Ranch, PL = Proposed Lots by applicable number.

Sources: U. S. Department of Agriculture Soil Survey of Northern Santa Barbara County, 1972 and 1981 eras. 1989 California Department of Conservation Important Farmlands Map Santa Barbara County, 1986 and 2002; and University of California Cooperative Extension Guidelines for Rangeland Management on Annual Range, 1982 and 2003; and SAGE Associates field assessments 2007.

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TABLE 1: RANCHO LA LAGUNA SOIL AGRICULTURAL CHARACTERISTICS

MAP SYM.	SOIL NAME	TEXTURE	USDA AVERAGE SLOPE % and Landform	CAPABILITY CLASS Irrigated/ Non-Irrigated STORE INDEX	RANCH ACRES ER PL#	RANGE SITE	RANGELAND DRY MATTER PRODUCTIVITY Favorable Year Average Year Unfavorable Year (pounds/acre)	ESTIMATED RESIDUAL DRY MATTER* Per USDA AVERAGE SLOPE (pounds/acre)	ESTIMATED AVAILABLE DRY MATTER Favorable Year Average Year Unfavorable Year (pounds/acre)	EROSION HAZARD/ SURFACE RUNOFF	REGIONAL AGRICULTURAL USAGE	SOIL AG USAGE	IMPORTANT FARMLANDS DESIGNATION
Smf	Santa Lucia	shaly clay loam	30 to 45% hills and mountains	VI/VI 24	24ER 22PL9 169PL10 50PL11	Loamy	2,100 1,550 1,000	800 800 800	1,400 750 200	high/ rapid	range, watershed	grazing, watershed	Grazing
SmG	Santa Lucia	shaly clay loam	45 to 75% mountains	VII/VII 16	24ER 2PL11 16PL12 6PL13	Steep Loamy	1,200 850 500	800 800 800	400 50 0	very high/ very rapid	range, watershed	grazing, watershed	Grazing
SpG	Sedimentary Rock Land	sandy-shaly loams, rock outcrops	30 to 100% mountains	VIII/VIII 2	138ER 14PL10 31PL12 93PL13	Not Assigned	<800 <800 <800	800 800 800	0 0 0	severe/ very rapid	range, watershed	limited grazing, watershed	Grazing

See Next Page

*At a sustainable moderate grazing level in order to prevent erosion and provide adequate ground cover to allow natural reseedling. At a minimum, 100 to 800 pounds per acre of residual dry matter is required depending on slope, canopy cover, and soil characteristics on annual grassland and/or hardwood rangelands. ER = Existing Ranch; PL = Proposed Lots by applicable number.

Sources: U. S. Department of Agriculture Soil Survey of Northern Santa Barbara County, 1972 and 1981 errata, 1983; California Department of Conservation Important Farmlands Map, Santa Barbara County, 1986 and 2002; and University of California Cooperative Extension Guidelines for Rangeland Management on Annual Ranges, 1982 and 2003, and SAGE Associates field assessments 2007.

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TABLE 1: RANCHO LA LAGUNA SOIL AGRICULTURAL CHARACTERISTICS

MAP SYM.	SOIL NAME	TEXTURE	USDA AVERAGE SLOPE % and Landform	CAPABILITY CLASS Irrigated/ Non-Irrigated STORIE INDEX	RANCH ACRES ER PL#	RANGE SITE	RANGELAND DRY MATTER PRODUCTIVITY Favorable Year Average Year Unfavorable Year (pounds/acre)	ESTIMATED RESIDUAL DRY MATTER* Per USDA AVERAGE SLOPE (pounds/acre)	ESTIMATED AVAILABLE DRY MATTER Favorable Year Average Year Unfavorable Year (pounds/acre)	EROSION HAZARD/ SURFACE RUNOFF	REGIONAL AGRICULTURAL USAGE	SOIL AG USAGE	IMPORTANT FARMLANDS DESIGNATION
SvC	Sorrento	loam	2 to 5% fans and terraces	II/III 86	108ER 7PL3 39PL4 43PL2 19PL13	Loamy	2,100 1,550 1,000	400 400 400	1,700 1,150 600	slight-med/ slow-med.	crops	crops, watershed	Prime
TuF	Terrace Escarpments	loamy	10 to 50% terrace side slopes	VII/VII 8	1ER 1PL13	Shallow Loamy	800 500 200	400-800 400-800 400-800	0-400 0-160 0	high/ rapid	grazing	grazing	Grazing
TtEz	Tierra	loam	15 to 30% terrace side slopes	VII/V1 19	17ER 17PL1	Claypan	1,300 1,050 800	600 600 600	700 650 200	mod-high/ med-rapid	rangeland watershed	grazing	Grazing

End

*At a sustainable moderate grazing level in order to prevent erosion and provide adequate ground cover to allow natural reseeding. At a minimum, 100 to 800 pounds per acre of residual dry matter is required depending on slope, canopy cover, and soil characteristics on annual grassland and/or hardwood rangelands. ER = Existing Ranch, PL = Proposed Lots by applicable number.

Sources: U. S. Department of Agriculture Soil Survey of Northern Santa Barbara County, 1972 and 1981 errata, 1989 California Department of Conservation Important Farmlands Map Santa Barbara County, 1986 and 2022, and University of California Cooperative Extension Guidelines for Rangeland Management on Annual Rangeland, 1982 and 2003, and SAGE Associates field assessments 2007.

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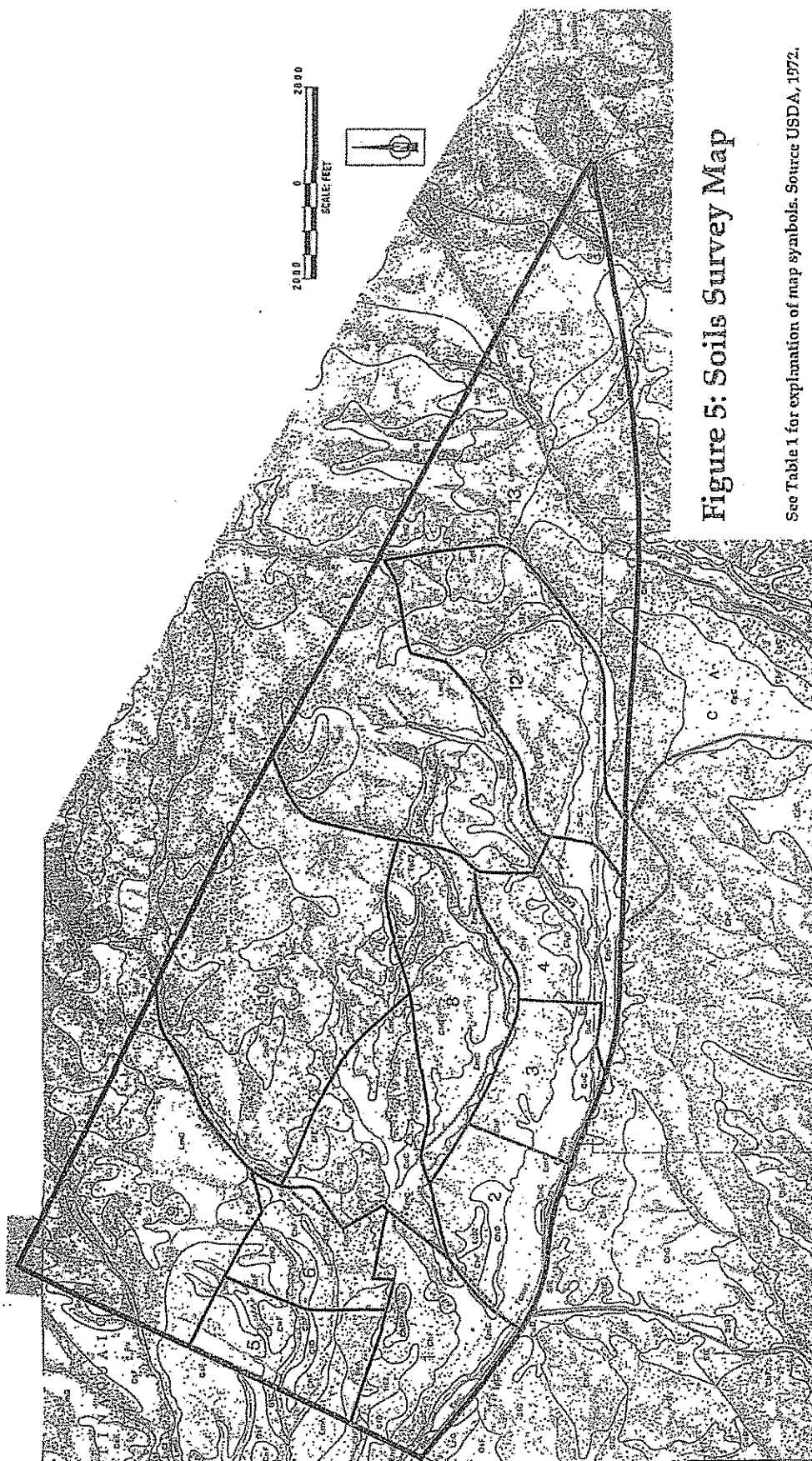


Figure 5: Soils Survey Map

See Table 1 for explanation of map symbols. Source: USDA, 1972.

Column 5: Gives the Capability Class for irrigated and nonirrigated conditions and the Storie Index for that particular soil. For the ArD soil, the Capability Class is IV/VI irrigated/nonirrigated and a Storie Index of 20. A general explanation of Capability Classes and Storie Index is as follows:

Capability Classes provide insight into the limitations of a soil for field crop uses based on factors that include texture, erosion, wetness, permeability, and fertility with Classes ranging from I to VIII. Storie Index Ratings evaluate the agricultural suitability of a soil for intensive farming based on the soil depth, texture, density, drainage, alkali content and relief with Ratings ranging from 1 to 100. Together the Capability Class and Storie Index can be used to help evaluate the soil suitability or viability for agriculture.

Capability Class I or II are Prime soils if irrigated. Storie Index Rating of 80-100 are Prime soils irrigated or non-irrigated. These soils would have fewest limitations for farming and livestock grazing.

Capability Class III and IV soils with Storie Index Ratings from 20 to 65 have increasing slope, texture and erosion limitations but most areas are generally suitable for crop production and are also highly suited for livestock grazing.

Capability Class V soils are not found on the ranch.

Capability Class VI-VII soils with Storie Index Ratings from eight to 36 are generally poorly suited for farming; and may have slope, erosion, shallow soil, low water capacity and tree canopy and brushland as limitations to livestock grazing. Grassland mosaics are common within and adjacent to scrub and tree areas.

Capability Class VIII soils with Storie Index Ratings between two may be limited to watershed and wildlife uses because of steep slopes, gullying, river channels, dense vegetation, and lower forage availability. Livestock may utilize edge areas or small mosaics of grassland.

Column 6: This column includes the ranch acreage of the soil and the acreages of each proposed lot. ER (existing ranch) – 44 acres, PL9 (proposed lot) – 44 acres. None of the other lots have this particular Soil Series.

Column 7: Includes the USDA assigned Range Site that are comprised of various Soil Series that produce similar types and quantities of dry matter material as described in the Soil Survey. The ArD soil is in the Sandy Range Site.

Column 8: Lists the rangeland dry matter productivity in favorable, average, and unfavorable years in pounds per acre per each particular NRCS Soil Series Range Site. For the Sandy Range Site the rangeland dry matter productivity is 1,200 pounds per acre in a favorable year, 750 pounds per acre in an average year, and 300 pounds per acre in an unfavorable year. The ArD soils has a low productivity

for rangeland because of the sandy texture. Clayey and Loamy Range Sites are the most productive for rangeland forage.

Column 9: Lists the estimated residual dry matter (RDM) per USDA average slope categories in pounds per acre per UCCE recommendations. The ArD soil and slope requires 400 pounds per acre of residual dry matter left on the ground at the end of the grazing season before the fall rains to maintain sustainable productivity and to prevent erosion.

Column 10: Lists the estimated available dry matter for grazing in pounds per acre. Estimated available dry matter is determined by subtracting the amount of estimated residual dry matter required to maintain a sustainable moderate level of grazing (i.e. where residual forage can average about two to four inches in height depending on slope, forage density, and soil texture, with higher or lower growth patchy areas and is sufficient to prevent erosion, and to provide a seed crop), per average Soil Survey slope categories as recommended by the University of California Cooperative Extension (1982, and 2003).

At a minimum, approximately 100 to 800 pounds of residual dry matter (RDM) (excluding late season annual species such as mustard, tarplant and doveweed) is required per acre depending on site-specific slope, canopy cover, litter, and soil characteristics. According to University of California Cooperative Extension (2003) research residual dry matter minimum standards for a moderate level of grazing for annual grassland and/or hardwood rangeland within a zone of 12 inches to 40 inches of rainfall includes the following categories:

Percent Canopy Cover	Percent Slope Pounds of Residual Dry Matter Per Acre			
	0-10%	10-20%	20-40%	>40%
0-25%	300-500 lbs	500-600 lbs	600-700 lbs	700-800 lbs
25-50%	400 lbs	500 lbs	600 lbs	700 lbs
50-75%	200 lbs	300 lbs	400 lbs	500 lbs
75-100%	100 lbs	200 lbs	250 lbs	300 lbs

Per the above categories as slopes increase, the amount of necessary residual dry matter increases. Conversely, as canopy cover increases, the amount of residual dry matter decreases. Canopy cover consists of brushland species and hardwood tree species. For example, a 10 percent slope covered with annual grasses would require about 300 pounds of residual dry matter whereas a 10 percent slope with 50 to 75 percent canopy cover would require 200 pounds of residual dry matter. Less steep slopes would require less residual dry matter. It should be noted, however, that in many cases as canopy cover increases the amount of grass forage production may decrease due to less favorable grassland production soil

conditions, leaf litter, and canopy shading. Thus, dense canopy cover may yield little or no palatable forage residual dry matter available for cattle grazing.

For the ArD soil Sandy Range Site on five to 15 percent average slope - subtract 400 pounds per acre of estimated residual dry matter from 750 pounds per acre of average year rangeland dry matter productivity, which yields an estimated available dry matter of 350 pounds per acre. The Sandy Range Site as described by the USDA in 1972, is typically comprised on annual and perennial grasses with areas of woody or brushy canopy cover. This is a good "starting" estimate to work with since soil productivity and site specific slopes, range condition, and canopy cover can vary over time, and this estimate includes all dry matter including both palatable and not palatable grasses, forbs, leaf matter, weeds, etc. In a good range condition, and readily accessible (with livestock water) open annual grassland, with slopes of five to 15 percent, the "available" 350 pounds per acre could probably all be usable for cattle forage. See Photo 15 as an example of the ArD soil rangeland.

However, water availability, cattle access, variable slopes, canopy cover, or undesirable plant species ultimately determine how much of the "available" pounds per acre of dry matter could be unusable as cattle forage on a site - specific basis. Hence, further refinement of the USDA 1972 Range Site evaluation was accomplished during the field assessment mapping in March and August of 2007. Results of this mapping will be discussed in the next section.

Column 11: Includes the erosion hazard and surface runoff for each soil. Sandy soils are more susceptible to erosion and erosion hazard and surface runoff increases as slope increases. The ArD soil has a moderate erosion hazard and a medium surface runoff.

Column 12: Summarizes the regional agricultural usage for the various Soil Series. The ArD soil is mostly used regionally for range. Some regional areas are now planted in winegrapes.

Column 13: Includes the soil agricultural usage on the ranch. The ArD soil is used for grazing and have recently been cleared for irrigated cropland (Photo 15A). Irrigated cropland areas are considered to be prime land because of the high gross income per acre of the crops grown. Cropland is considered prime when the long-term average gross yearly production value exceeds \$200 per acre. Gross yearly per acre production revenue values for the following row crops grown on the ranch include the following: Snow peas (\$7,400), bell peppers (\$11,000), and lettuce (\$6,500). Dryland grain and hay crops gross about \$324 per acre. Winegrapes are potential and possible future crops on the ranch that regionally gross about \$5,200 per acre. Grazing areas of the proposed lots is ancillary to the crop production values since rangeland gross revenue values are about \$45 per acre (Santa Barbara County Crop Report, 2006).

Column 14: Lists the California Department of Conservation Important Farmlands Mapping Program (1986 and 2002) designations by soil type. The ArD

soil is designated as Grazing Land and land of Local Importance for dryland hay, grain, and bean crops.

Thirty-four Soil Series are located across the ranch. Please refer to Table 1 for their specific soil agricultural characteristics for the ranch and the 13 proposed lots, and their mapped locations on Figure 5.

B. Agricultural Viability and Cattle Grazing Suitability Factors

The determination of the cropland suitability, and the cattle grazing suitability and carrying capacity are summarized in Table 2 and shown on Figure 6. Site observations were conducted in order to evaluate the following factors that can either benefit or constrain cropland use and cattle grazing including irrigation water availability, soils, on-site slope, canopy cover, sensitive resources, range condition of available palatable forage, cattle watering locations, on-site cattle grazing distribution (access), adequacy of fencing, and erosion.

From the above factors, the cropland and cattle grazing suitability were determined which is reflected in the Higher, Moderate, Lower, or Unsuitable cropland and cattle grazing suitability categories.

The following observations were made during the field assessments in March and August of 2007 and are summarized in the columns of Table 2 per soil type. The ArD soil will again be used as a specific example.

Column 1: Lists the soil name and soil map symbol (Arnold/ArD).

Column 2: On-site slope further refines the Soil Survey average slope categories as needed. For the ranch, the Soil Survey average slopes are not accurately represented on upland ridgetops and swales where more gentle sloping areas occur. Slope categories include 0 to 10 percent along alluvial terraces, the base of the foothills and upland ridgetops and swales; 10 to 25 percent on foothill area sideslopes; 25 to 40 percent on steeper foothills and mountain slopes; and greater than 40 percent on mountainous upland areas. The ArD soil slope averages are 0 to 10 percent on upland swales.

Column 3: Summarizes the percent canopy cover by soil type. Canopy cover such as brush or dense oaks can reduce the amount of available forage as discussed previously and can reduce cropland uses. The ArD soil has 0 percent canopy cover on the cleared irrigated cropland areas; 0 to 25 percent canopy cover on some of the remaining rangeland areas that have not been cleared; and 100 percent canopy cover in dense brushland.

Column 4: Includes the range conditions for palatable forage or the agricultural use per soil type. The range conditions for palatable cattle forage are excellent across nearly all of the ranch, where concentrations of wild oats, rye grass, various brome and fescue grasses, filaree, purple needle grass, and bur clover predominate. Other very small range condition areas are considered poor to unsuitable depending on the concentrations of unpalatable coastal sage scrub and

TABLE 2: RANCHO LA LAGUNA CROPLAND AND CATTLE GRAZING CARRYING CAPACITY DETERMINATION

SOIL NAME/ MAP SYMBOL	ON SITE SLOPE %	CANOPY COVER %	RANGE CONDITION PALATABLE FORAGE or USE	AG WATER SUMMARY AT END	ON-SITE CATTLE GRAZING DISTRIBUTION	FENCING LOT SUMMARY AT END	SITE EROSION	ACTUAL AVAILABLE DRY FORAGE Average Year (pounds/acre)	PROPOSED LOT ACRES PL#	TOTAL SITE AVAILABLE DRY FORAGE Average Year (pounds)	CATTLE GRAZING SUSTAINABILITY or other AG USE	HISTORIC CATTLE CARRYING CAPACITY (AU's/Year)	CALCULATED CATTLE CARRYING CAPACITY (AU's/Year)*
Arnold/Ard	0 to 10% 0 to 10% 0 to 10%	0% 0 to 25% 100%	irrigated crops good none		crops good none		none none none	350 0 0	29 PL9 11PL9 4PL9	crops or 10,190 3,850 0	Higher-crops Higher Unsuitable	see ranch totals	cropland or 0.92 0.4 0
Arnold/Arf3	10 to 25% 10 to 25% 40%	<25% <25% 100%	good-fair good-fair none		good-fair good-fair none		none none none	250 250 0	4PL1 7PL11 2PL13	1,000 1,750 0	Moderate Moderate Unsuitable	0.1 0.2 0	0.1 0.2 0
	0 to 10% 10 to 25% 25 to 40%	0 to 25% <25% 50 to 75%	good good-fair fair-poor		good good-fair fair-poor		none none none	350 150 350	11PL12 1PL12 48PL12	3,550 250 150	Higher Moderate Lower	0.4 0.02 0.7	0.4 0.02 0.7
	0 to 10% 0 to 10% 10 to 25%	0 to 25% 0 to 25% <25%	good good good-fair		good good good-fair		none none none	350 250 0	2PL13 8PL13 10PL13	700 2,000 0	Higher Moderate Unsuitable	0.1 0.2 0	0.1 0.2 0
Botella/BoA	0 to 10% 0 to 10% 0 to 10%	0 to 25% 0% 0%	good irrigated crops irrigated crops		good crops crops		none none none	1,150 crops or 1,150 crops or 1,150	15PL1 26PL5 6PL6	17,250 crops or 29,900 crops or 6,900	Higher Higher-crops Higher-crops	1.6 cropland or 2.7 cropland or 0.6	1.6 cropland or 2.7 cropland or 0.6
Botella/BoD2	0 to 10% 0 to 10% 0 to 10%	0 to 25% 0% 0%	good irrigated crops good		good crops good		creak banks none none	1,150 crops or 1,150 1,450	21PL13 2PL1 11PL5	21,250 crops or 2,900 15,950	Higher Higher-crops Higher	potential crops or 2.2 cropland or 0.1 1.5	potential crops or 2.2 cropland or 0.1 1.5
Chamisa/ChD	0 to 10% 0 to 10% 0 to 10% 0 to 10% 0 to 10%	0% 0 to 25% 0 to 25% 0 to 25% 0 to 25%	dryland crops good good good good		crops good good good good-fair		none none none none none	crops or 1,150 1,150 1,150 1,150 1,050	6PL1 9PL1 9PL5 9PL6 9PL7	crops or 6,900 10,350 10,350 10,350 9,450	Higher-crops Higher Higher Higher Moderate	cropland or 0.6 1 1 1 0.9	cropland or 0.6 1 1 1 0.9
	10 to 25% 10 to 25% 10 to 25%	<25% <25% <25%	good-fair good-fair good-fair		good-fair good-fair good-fair		none none none	1,050 1,050 0	63PL8 4PL13 19PL2	66,150 3,850 21,850	Moderate Lower Higher	6 0.4 2	6 0.4 2
Chamisa/ChF	0 to 10% 0 to 10% 0 to 10% 0 to 10% 0 to 10%	0% 0 to 25% 0 to 25% 0 to 25% 0 to 25%	fair-poor good good good good		fair-poor good good good good		none none none none none	950 1,150 1,150 1,150 1,150	12PL1 69PL1 28PL2 23PL2 23PL2	crops or 13,800 79,350 32,200 23,100 21,250	Higher-crops Higher Higher Moderate Lower	cropland or 1.3 7.2 2.9 2.1 1.9	cropland or 1.3 7.2 2.9 2.1 1.9
	25 to 40% 25 to 40% 25 to 40%	50 to 75% 50 to 75% 100%	fair-poor fair-poor none		fair-poor fair-poor none		none none none	0 0 0	2PL2 2PL2 2PL2	0 0 0	Unsuitable Unsuitable Unsuitable	0 0 0	0 0 0

* Assumes an average of 30 pounds per day of dry forage consumption per 1000 pounds of grazing animal (Animal Unit-AU) or about 11,000 pounds of dry forage consumption per animal unit per year (AU/Year).
 Sources: U. S. Department of Agriculture Soil Survey Northern Santa Barbara Area, 1972 U.C. Cooperative Extension Guidelines for Residue Management on Annual Ranges, 1982 and 2006; Jensen, Wyoming Estimating Grazing Capacity, Central Coast Agricultural Highlights, 1995; and SAGE Associates Cattle Grazing Suitability Site Field Assessments 2007.

TABLE 2: RANCHO LA LAGUNA CROPLAND AND CATTLE GRAZING CARRYING CAPACITY DETERMINATION

SOIL NAME/ MAP SYMBOL	ON SITE SLOPE %	CANOPY COVER %	RANGE CONDITION	AG WATER SUMMARY	ON-SITE CATTLE GRAZING DISTRIBUTION	FENCING LOT SUMMARY	SITE EROSION	ACTUAL AVAILABLE DRY FORAGE (pounds/acre)	PROPOSED LOT ACRES	TOTAL SITE AVAILABLE DRY FORAGE (pounds/acre)	CATTLE GRAZING SUITABILITY or other AG USE	HISTORIC CATTLE CARRYING CAPACITY (AU/Year)	CALCULATED CATTLE CARRYING CAPACITY (AU/Year)
Chamise/Chf	0 to 10%	0 to 25%	good	good	good	AT END	none	1,150	1PL3	1,150	Higher	see ranch totals	0.1
	10 to 25%	<25%	good-fair	good-fair	good-fair		none	1,050	5PL3	50,900	Moderate		5.5
	25 to 40%	50 to 75%	fair-poor	fair-poor	fair-poor		none	850	25PL3	2,100	Lower		0.2
	>40%	100%	none	none	none		none	0	2PL3	0	Unsuitable		0
	0 to 10%	0%	irrigated crops	irrigated crops	crops		none	crops or 1,150	5PL4	crops or 5,750	Higher-crops		crops or 0.5
	10 to 25%	<25%	good-fair	good-fair	good-fair		none	1,050	52PL4	54,600	Moderate		5
	25 to 40%	50 to 75%	fair-poor	fair-poor	fair-poor		none	850	26PL4	22,100	Lower		1
	0 to 10%	0 to 25%	good	good	good		none	1,150	12PL5	13,400	Higher		1.3
	10 to 25%	<25%	good-fair	good-fair	good-fair		none	1,050	20PL5	21,000	Moderate		2
	25 to 40%	50 to 75%	fair-poor	fair-poor	fair-poor		none	850	2PL5	1,700	Lower		0.2
	>40%	100%	none	none	none		creek banks	0	2PL5	0	Unsuitable		0
	0 to 10%	0 to 25%	good	good	good		none	1,150	21PL6	24,150	Higher		2.2
	25 to 40%	50 to 75%	fair-poor	fair-poor	fair-poor		none	850	8PL6	6,800	Lower		0.6
	>40%	100%	none	none	none		creek banks	0	6PL6	0	Unsuitable		0
	0 to 10%	0 to 25%	good	good	good		none	1,150	44PL7	50,600	Higher		4.6
	25 to 40%	50 to 75%	fair-poor	fair-poor	fair-poor		none	850	4PL7	3,400	Lower		0.3
	0 to 10%	0 to 25%	good	good	good		none	1,150	28PL8	32,200	Higher		2.9
	10 to 25%	<25%	good-fair	good-fair	good-fair		none	1,050	6PL8	6,300	Moderate		0.6
	25 to 40%	50 to 75%	fair-poor	fair-poor	fair-poor		none	850	9PL8	6,800	Lower		0.6
	>40%	100%	none	none	none		none	0	20PL8	0	Unsuitable		0
	0 to 10%	0 to 25%	good	good	good		none	1,150	8PL10	9,200	Higher		0.8
	25 to 40%	50 to 75%	fair-poor	fair-poor	fair-poor		none	850	3PL10	2,550	Lower		0.2
	>40%	100%	none	none	none		none	0	37PL10	0	Unsuitable		0
	>40%	100%	none	none	none		none	0	20PL11	0	Unsuitable		0
	0 to 10%	0 to 25%	good	good	good		none	1,150	5PL12	5,750	Higher		0.5
	10 to 25%	<25%	good-fair	good-fair	good-fair		none	1,050	115PL12	120,750	Moderate		11
	25 to 40%	50 to 75%	fair-poor	fair-poor	fair-poor		none	850	20PL12	17,000	Lower		1.3
	>40%	100%	none	none	none		none	0	31PL12	0	Unsuitable		0
	0 to 10%	0 to 25%	good	good	good		none	1,150	3PL13	3,450	Higher		0.3
	25 to 40%	50 to 75%	fair-poor	fair-poor	fair-poor		none	850	47PL13	39,850	Lower		3.2
	>40%	100%	none	none	none		none	0	59PL13	0	Unsuitable		0
Chamise/ChG	25 to 40%	50 to 75%	fair-poor	fair-poor	fair-poor		none	250	6PL11	1,500	Lower		0.1
	25 to 40%	50 to 75%	fair-poor	fair-poor	fair-poor		none	250	30PL7	7,500	Lower		0.7
	25 to 40%	50 to 75%	fair-poor	fair-poor	fair-poor		none	250	26PL8	6,500	Lower		0.6
	>40%	100%	none	none	none		none	0	6PL8	0	Unsuitable		0
	>40%	100%	none	none	none		none	0	16PL11	0	Unsuitable		0
Chamise/ChG2	>40%	100%	none	none	none		none	0	4PL6	0	Unsuitable		0
Chamise/Chf	10 to 25%	<25%	good-fair	good-fair	good-fair		none	1,250	57PL11	71,250	Moderate		6.5

* Assumes an average of 30 pounds per day of dry forage consumption per 1000 pounds of grazing animal (Animal Unit AU) or about 11,000 pounds of dry forage consumption per animal unit per year (AU/Year).

Sources: U. S. Department of Agriculture Soil Survey Northern Santa Barbara Area, 1972; U.C. Cooperative Extension Guidelines for Resource Management on Annual Rangeland, 1982 and 2003; Jensen, Wayne, Estimating Grazing Capacity, Central Coast Agricultural Highlights, 1985; and SAGE Associates Cattle Grazing Suitability Site Field Assessment to 2007.

TABLE 2: RANCHO LA LAGUNA CROPLAND AND CATTLE GRAZING CARRYING CAPACITY DETERMINATION

SOIL NAME/ MAP SYMBOL	ON SITE SLOPE %	CANOPY COVER %	RANGE CONDITION PALATABLE FORAGE or USE	AG WATER SUMMARY AT END	ON-SITE CATTLE GRAZING DISTRIBUTION	FENCING LOT SUMMARY AT END	SITE EROSION	ACTUAL AVAILABLE DRY FORAGE Average Year (pounds/acre)	PROPOSED LOT ACRES PL #	TOTAL SITE AVAILABLE DRY FORAGE Average Year (pounds)	CATTLE GRAZING SUTABILITY or other AG USE	HISTORIC CATTLE CARRYING CAPACITY (AU/Year)	CALCULATED CATTLE CARRYING CAPACITY (AU/Year)
Corralitos/CuC	0 to 10%	0%	irrigated crops		crops		none	crops or 350	6PL1	crops or 2,100	Higher-crops	see ranch totals	cropland or 0.2
	0 to >40%	100%	none		none		creek banks	0	6PL1	0	Unsuitable		0
	0 to 10%	0%	irrigated crops		crops		none	crops or 350	4PL2	crops or 1,400	Higher-crops		cropland or 0.1
	0 to >40%	100%	none		none		creek banks	0	1PL2	0	Unsuitable		0
	0 to 10%	0%	irrigated crops		crops		none	crops or 350	6PL3	crops or 2,100	Higher-crops		cropland or 0.2
Corralitos/CuD	0 to 10%	0%	irrigated crops		crops		none	crops or 350	6PL7	crops or 2,100	Higher-crops		cropland or 0.2
	10 to 25%	<25%	good-fair		good-fair		none	250	4PL7	1,000	Moderate		0.1
	0 to 10%	0 to 25%	good		good		none	350	15PL10	5,250	Higher		possible crops or 0.5
	0 to 10%	0 to 25%	good		good		none	1,150	20PL6	23,000	Higher		possible crops or 2.1
	0 to 10%	0 to 25%	good		good		none	1,150	4PL9	4,600	Higher		possible crops or 0.4
Crow Hill/CwE	0 to 10%	0 to 25%	good		good		none	1,150	35PL10	40,250	Higher		possible crops or 3.7
	0 to 10%	0 to 25%	good		good		none	1,150	18PL11	20,700	Higher		possible crops or 1.9
	0 to 10%	0 to 25%	good		good		none	1,150	20PL12	2,300	Higher		possible crops or 0.2
	0 to 10%	0 to 25%	good		good		none	1,150	12PL5	13,800	Higher		1.3
	0 to 10%	0 to 25%	irrigated crops		crops		none	crops or 1,150	9PL7	crops or 10,350	Higher-crops		cropland or 1
Elder/EaC2	0 to 10%	0 to 25%	good		good		none	1,150	5PL10	5,750	Higher		possible crops or 0.5
Elder/EaD2	0 to 10%	0 to 25%	good		good		none	1,150	7PL2	8,050	Higher		possible crops or 0.7
	25 to 40%	50 to 75%	fair-poor		fair-poor		none	500	11PL13	5,500	Lower		0.5
Elder/EaA	0 to 10%	0%	irrigated crops		crops		none	crops or 1,150	13PL5	crops or 14,950	Higher-crops		cropland or 1.4
Elder/EaC	0 to 10%	0%	irrigated crops		crops		none	crops or 1,150	59PL1	crops or 63,250	Higher-crops		cropland or 5.8
	0 to 10%	0%	irrigated crops		crops		none	crops or 1,150	58PL2	crops or 66,700	Higher-crops		cropland or 6.1
	0 to >40%	100%	none		none		creek banks	0	12PL2	0	Unsuitable		0
	0 to 10%	0 to 25%	irrigated crops		crops		none	crops or 1,150	35PL3	crops or 40,250	Higher-crops		cropland or 3.7
	0 to 10%	100%	good		good		none	1,150	3PL3	3,450	Higher		possible crops or 0.3
	0 to >40%	0%	irrigated crops		none		creek banks	0	2PL3	0	Unsuitable		0
	0 to 10%	0 to 25%	irrigated crops		crops		none	crops or 1,150	28PL4	crops or 32,000	Higher-crops		cropland or 2.9
	0 to 10%	100%	good		good		none	1,150	4PL4	6,900	Higher		possible crops or 0.6
	0 to >40%	100%	none		none		creek banks	0	2PL4	0	Unsuitable		0
	0 to 10%	0%	irrigated crops		crops		none	crops or 1,150	1PL5	crops or 1,150	Higher-crops		cropland or 0.1
	0 to 10%	0%	irrigated crops		crops		none	crops or 1,150	32PL6	crops or 35,000	Higher-crops		cropland or 3.4
	0 to >40%	100%	none		none/facilities		creek banks	0	6PL6	0	Unsuitable		0
	0 to 10%	0%	irrigated crops		crops		none	crops or 1,150	52PL7	crops or 59,000	Higher-crops		cropland or 5.4
	0 to 10%	0 to 25%	good		good		none	1,150	22PL7	23,200	Higher		possible crops or 2.3
	0 to 10%	0%	irrigated crops		good		none	crops or 1,150	49PL8	crops or 56,350	Higher-crops		cropland or 5.1
	0 to 10%	0 to 25%	good		good		none	1,150	15PL9	17,250	Higher		possible crops or 1.6

* Assumes an average of 50 pounds per day of dry forage consumption per 1000 pounds of grazing animal (Animal Unit-AU) or about 11,000 pounds of dry forage consumption per animal unit per year (AU/Year).

Sources: U.S. Department of Agriculture Soil Survey, Northern Santa Barbara Area, 1972; U.C. Cooperative Extension Guidelines for Residential Expansion: Guidelines for Grazing Management on Annual Range, 1982 and 2008; Jensen, Wayne, Estimating Grazing Capacity, Central Coast Agricultural Highlights, 1995; and SAGE Associates Cattle Grazing Suitability Site Field Assessments 2007.

TABLE 2: RANCHO LA LAGUNA CROPLAND AND CATTLE GRAZING CARRYING CAPACITY DETERMINATION

SOIL NAME/ MAP SYMBOL	ON SITE SLOPE %	CANOPY COVER %	RANGE CONDITION PALATABLE FORAGE or USE	AG WATER SUMMARY AT END	ON-SITE CATTLE GRAZING DISTRIBUTION	FENCING LOT SUMMARY AT END	SITE EROSION	ACTUAL AVAILABLE DRY FORAGE (pounds/acre)	PROPOSED LOT ACRES PL ^a	TOTAL SITE AVAILABLE DRY FORAGE (pounds) Average Year	CATTLE GRAZING SUITABILITY or other AG USE	HISTORIC CATTLE CARRYING CAPACITY (ADU/Year)	CALCULATED CATTLE CARRYING CAPACITY (ADU/Year)
Blder/EnC	0 to >40%	100%	none		none		creek banks	0	6PL3	0	Unsuitable	set match totals	0
	0 to 10%	0 to 25%	good		good		none	1,150	1PL9	1,150	Higher		possible crops or 0.9
	0 to 10%	0 to 25%	good		good		none	1,150	9PL10	10,350	Higher		0
	0 to >40%	100%	none		none		creek banks	0	1PL10	0	Unsuitable		0
	0 to 10%	0%	irrigated crops		crops		none	crops or 1,150	2PL21	crops or 2,300	Higher-crops		cropland or 0.2
	0 to 10%	50 to 75%	fair-poor		fair-poor		none	650	2PL12	1,300	Lower		0.1
Blder/EnC	0 to 10%	0 to 25%	good		good		none	1,150	2PL13	2,300	Higher		potential crops or 0.2
	0 to 10%	0%	irrigated crops		crops		none	crops or 1,150	12PL4	crops or 13,800	Higher-crops		cropland or 1.3
	0 to >40%	100%	none		none		creek banks	0	2PL4	0	Unsuitable		0
	0 to 10%	0 to 25%	good		good		none	1,150	8PL8	9,200	Higher		possible crops or 0.8
	0 to >40%	100%	none		none		creek banks	0	1PL8	0	Unsuitable		0
	0 to 10%	0%	irrigated crops		crops		none	crops or 1,150	18PL11	crops or 20,700	Higher-crops		cropland or 1.9
Causes/GaF	0 to 10%	0 to 25%	good		good		none	1,150	11PL11	12,650	Higher		possible crops or 1.2
	0 to >40%	100%	none		none		creek banks	0	1PL11	0	Unsuitable		0
	0 to 10%	0 to 25%	good		good		none	1,150	2PL12	2,300	Higher		0.2
	10 to 25%	<25%	good-fair		good-fair		none	1,050	3PL5	3,150	Moderate		0.3
	25 to 40%	50 to 75%	fair-poor		fair-poor		none	850	39PL5	27,200	Lower		2.5
	0 to 10%	0 to 25%	good		good		none	1,150	22PL6	25,300	Higher		2.3
Lopez/LmG	25 to 40%	50 to 75%	fair-poor		fair-poor		none	850	3PL6	2,250	Lower		0.2
	0 to 10%	0 to 25%	good		good		none	1,150	25PL9	28,750	Higher		2.6
	10 to 25%	<25%	good-fair		good-fair		none	1,050	24PL9	23,200	Moderate		2.3
	25 to 40%	50 to 75%	fair-poor		fair-poor		none	850	20PL9	24,650	Lower		2.2
	>40%	100%	none		none		creek banks	0	35PL9	0	Unsuitable		0
	>40%	100%	none		none		none	0	20PL13	0	Unsuitable		0
Lopez/LmG	0 to 10%	0 to 25%	good		good		none	1,150	1PL3	1,150	Higher		0.1
	25 to 40%	50 to 75%	fair-poor		fair-poor		none	750	4PL5	3,000	Lower		0.3
	>40%	100%	none		none		none	0	4PL5	0	Unsuitable		0
	25 to 40%	50 to 75%	fair-poor		fair-poor		none	750	5PL6	3,750	Lower		0.3
	>40%	100%	none		none		none	0	1PL6	0	Unsuitable		0
	>40%	100%	none		none		none	0	23PL8	0	Unsuitable		0
Lopez/LmG	25 to 40%	50 to 75%	fair-poor		fair-poor		none	850	20PL9	24,650	Lower		4.9
	>40%	100%	none		none		none	0	63PL10	\$2,550	Unsuitable		0
	25 to 40%	50 to 75%	fair-poor		fair-poor		none	0	22PL10	0	Unsuitable		burned/cleared 15.5
	25 to 40%	0 to 50%	good-poor		good-poor		slides	950	179PL11	170,050	Lower		0
	>40%	0 to 100%	none		none		slides	0	37PL11	0	Unsuitable		burned/cleared 2.6
	25 to 40%	0 to 50%	good-poor		good-poor		slides	950	50PL12	28,500	Lower		1.3
Lopez/LmG	25 to 40%	50 to 75%	fair-poor		fair-poor		none	500	24PL13	14,000	Lower		0
	>40%	100%	none		none		slides	0	173PL13	0	Unsuitable		0
	>40%	100%	none		none		slides	0	173PL13	0	Unsuitable		0
	>40%	100%	none		none		slides	0	173PL13	0	Unsuitable		0
	>40%	100%	none		none		slides	0	173PL13	0	Unsuitable		0
	>40%	100%	none		none		slides	0	173PL13	0	Unsuitable		0

^a Assumes an average of 30 pounds per day of dry forage consumption per 1000 pounds of grazing animal (Animal Unit-AU) or about 11,000 pounds of dry forage consumption per animal unit per year (ADU/Year).

Sources: U. S. Department of Agriculture Soil Survey Northern Santa Barbara Area, 1972; U.C. Cooperative Extension Guidelines for Rangeland Management on Annual Range, 1982 and 2003; Jensen, Wayne Estimating Grazing Capacity, Central Coast Agricultural Highlights, 1995; and SAGE Associates Cattle Grazing Suitability Site Field Assessments 2007.

TABLE 2: RANCHO LA LAGUNA CROPLAND AND CATTLE GRAZING CARRYING CAPACITY DETERMINATION

SOIL NAME/ MAP SYMBOL	ON SITE SLOPE %	CANOPY COVER %	RANGE CONDITION PALATABLE FORAGE or USE	AG WATER SUMMARY AT END	ON-SITE CATTLE GRAZING DISTRIBUTION	FENCING LOT SUMMARY AT END	SITE EROSION	ACTUAL AVAILABLE DRY FORAGE (pounds/acre)	PROPOSED LOT ACRES PL ²	TOTAL SITE AVAILABLE DRY FORAGE (pounds)	CATTLE GRAZING SUITABILITY or AG USE	HISTORIC CATTLE CARRYING CAPACITY (AU/Year)	CALCULATED CATTLE CARRYING CAPACITY (AU/Year)
San Andreas-Tierra/SfD	0 to 10% 10 to 25% >40%	0 to 25% <25% 100%	good good-fair none		good good-fair none		none none none	900 800 0	17PL7 6PL7 10PL9	15,300 4,500 0	Higher Moderate Unsuitable	see ranch totals	1.9 0.4 0
San Andreas-Tierra/SfE	10 to 25% 10 to 25% 10 to 25%	<25% <25% <25%	good-fair good-fair good-fair		good-fair good-fair good-fair		none none none	800 800 800	20PL7 9PL10 12PL12	26,000 7,200 9,600	Moderate Moderate Moderate		1.5 0.7 0.9
San Andreas-Tierra/SfG	0 to 10% >40%	0 to 25% 100%	good none		good none		none none	850 0	37PL9 13PL9	31,450 0	Higher Unsuitable		2.9 0
Santa Lucia/SmE inclusions in Lopez soil	0 to 10%	0 to 25%	good		good		none	1,150	4PL13	4,600	Higher		0.4
Santa Lucia/SmF	0 to 10% >40% 0 to 10% 25 to 40% >40% 0 to 10% 10 to 25% >40%	0 to 25% 100% 0 to 25% 0 to 25% 100% 0 to 25% <25% 100%	good none good fair none good good-fair none		good none good fair none good good-fair none		none creek banks none none slides none slides	1,150 0 1,150 850 0 1,250 1,050 0	37PL9 19PL9 79PL10 16PL10 74PL10 31PL11 13PL11 6PL11	3,450 0 90,950 13,600 0 35,650 12,650 0	Higher Unsuitable Higher Lower Unsuitable Higher Moderate Unsuitable	possible crops or 8.3 possible crops or 8.3 possible crops or 8.3 possible crops or 8.3 possible crops or 8.3 possible crops or 8.3 possible crops or 8.3 possible crops or 8.3	0.3 0 1.2 0 0 3.2 1.2 0
Santa Lucia/SmG	>40% >40% >40%	100% 100% 100%	none none none		none none none		none none none	0 0 0	2PL11 16PL12 6PL13	0 0 0	Unsuitable Unsuitable Unsuitable		0 0 0
Sedimentary Rock Land/SpcG	>40% 25 to 40% >40% 25 to 40% >40%	100% 50 to 75% 100% 50 to 75% 100%	none poor none poor none		none poor none poor none		none none none none none	0 150 0 50 0	14PL10 2PL12 29PL12 7PL13 86PL13	0 300 0 350 0	Unsuitable Lower Unsuitable Lower Unsuitable		0 0.03 0 0.03 0
Sorrento/S+C	0 to 10% 0 to 10% 0 to >40% 0 to 10% 0 to >40% 0 to 10%	0% 0% 100% 0% 100% 0%	irrigated crops irrigated crops none irrigated crops none irrigated crops		crops crops none crops none crops		none none creek banks none creek banks none	crops or 1,150 crops or 1,150 none crops or 1,150 none crops or 1,150	7PL3 36PL4 3PL4 99PL12 4PL12 19PL13	crops or 8,050 crops or 41,400 none crops or 45,850 none crops or 21,850	Higher-crops Higher-crops Unsuitable Higher-crops Unsuitable Higher-crops	cropland or 0.7 cropland or 3.0 0 cropland or 4.1 0 cropland or 2	

* Assumes an average of 30 pounds per day of dry forage consumption per 1000 pounds of grazing animal (Animal Unit-AU) or about 11,000 pounds of dry forage consumption per animal unit per year (AU/Year).

Source: U.S. Department of Agriculture Soil Survey Northern Santa Barbara Area, 1972; U.C. Cooperative Extension Guidelines for Residue Management on Annual Range, 1982 and 2003; Jensen, Weying, Estimating Grazing Capacity, Central Coast Agricultural Highlights, 1985; and SAGE Associates Cattle Grazing Suitability Site Field Assessments 2007.

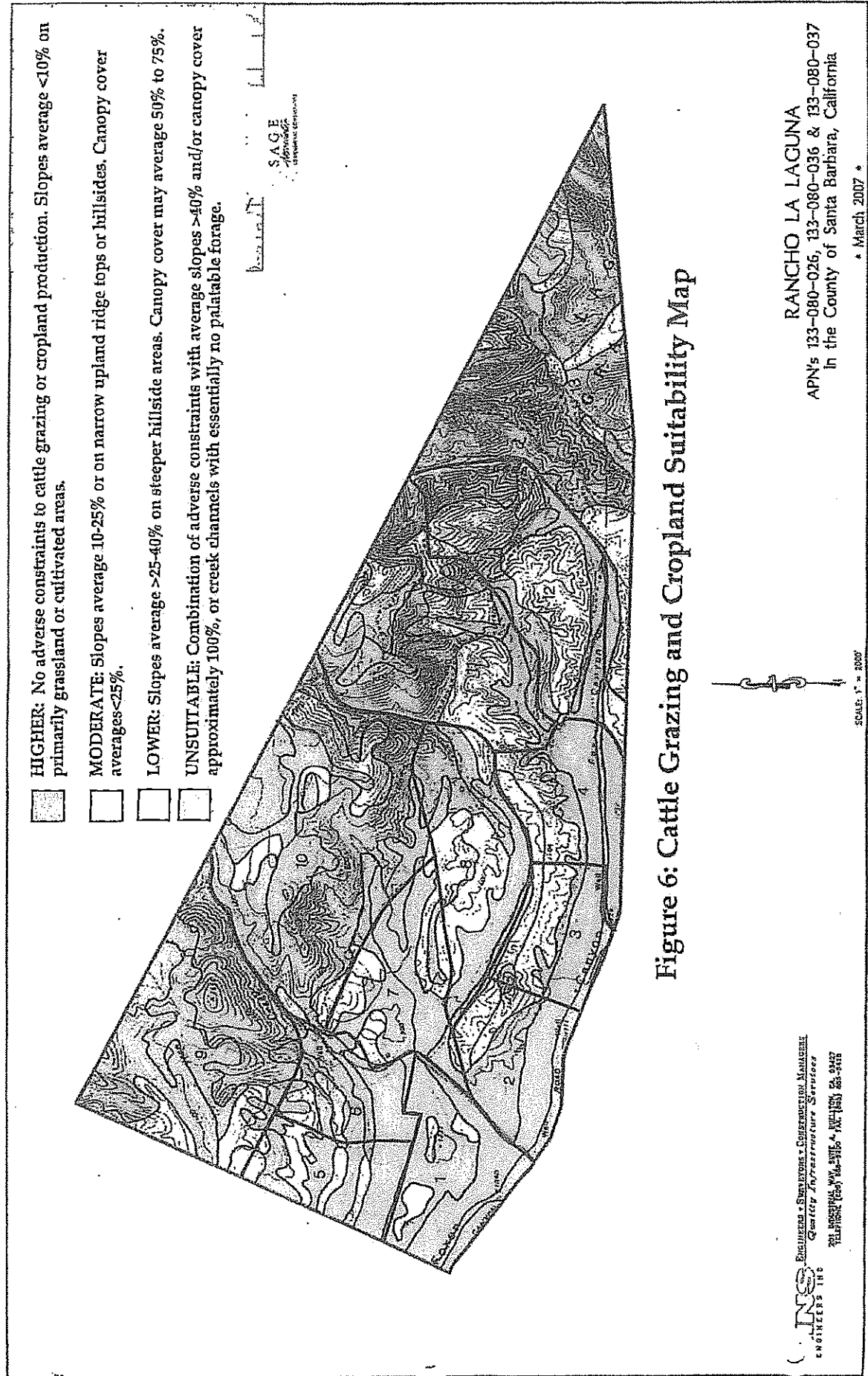
TABLE 2: RANCHO LA LAGUNA CROPLAND AND CATTLE GRAZING CARRYING CAPACITY DETERMINATION

SOIL NAME/ MAP SYMBOL	ON SITE SLOPE %	CANOPY COVER %	RANGE CONDITION PALATABLE FORAGE or USE	AG WATER LOT SUMMARY	ON-SITE CATTLE GRAZING DISTRIBUTION	FENCING LOT SUMMARY	SITE EROSION	ACTUAL AVAILABLE DRY FORAGE Average Year (pounds/acre)	PROPOSED LOT ACRES PL#	TOTAL SITE AVAILABLE DRY FORAGE Average Year (pounds)	CATTLE GRAZING SUITABILITY or other AC USE	HISTORIC CATTLE CARRYING CAPACITY (AU/Year)	CALCULATED CATTLE CARRYING CAPACITY (AU/Year)*
Escarpment/ TJF	0 to 10%	0 to 25%	good		good		none	1,150	1PL13	1,150	Higher	per ranch totals	potential crops or 0.1
Tierra/TriZ	0 to 10%	0 to 25%	good		good		none	500	2PL1	1,300	Higher	0.1	
	10 to 25%	<25%	good-fair		good-fair		none	500	15PL1	7,500	Moderate	0.7	
TOTALS													
			adequate	adequate	complete	complete			3,934 acres ER	18 acs dry crops 259 acs poss crops 24 acs pot crops	569 acs irr crops	194-204 AU/Year	172-227 AU/Year
			adequate	adequate	incomplete	incomplete			207 acres PL1	18 acs dry crops	75 acs irr crops	not available	11 to 19
			adequate	adequate	incomplete	incomplete			178 acres PL2	7 acs poss crops	60 acs irr crops	not available	10 to 16
			adequate	adequate	incomplete	incomplete			147 acres PL3	3 acs poss crops	40 acs irr crops	not available	7 to 11
			adequate	adequate	incomplete	incomplete			191 acres PL4	6 acs poss crops	81 acs irr crops	not available	9 to 17
			adequate	adequate	incomplete	incomplete			152 acres PL5		40 acs irr crops	not available	11 to 15
			adequate	adequate	incomplete	incomplete			143 acres PL6	20 acs poss crops	58 acs irr crops	not available	9 to 13
			adequate	adequate	incomplete	incomplete			213 acres PL7	22 acs poss crops	65 acs irr crops	not available	12 to 19
			adequate	adequate	incomplete	incomplete			259 acres PL8	23 acs poss crops	40 acs irr crops	not available	13 to 15
			adequate	adequate	incomplete	incomplete			450 acres PL9	4 acs poss crops	29 acs irr crops	not available	11 to 12
			adequate	adequate	incomplete	incomplete			595 acres PL10	143 acs poss crops	20 acs irr crops	not available	30 to 32
			adequate	adequate	incomplete	incomplete			429 acres PL11	20 acs poss crops	39 acs irr crops	not available	18 to 22
			adequate	adequate	incomplete	incomplete			369 acres PL12	2 acs poss crops	19 acs irr crops	not available	9 to 11
			adequate	adequate	incomplete	incomplete			601 acres PL13	24 acs pot crops			

* Assumes an average of 30 pounds per day of dry forage consumption per 1000 pounds of grazing animal (Animal Unit-AUD) or about 11,000 pounds of dry forage consumption per animal unit per year (AU/Year).

Sources: U. S. Department of Agriculture Soil Survey Northern Santa Barbara Area, 1974; U.C. Cooperative Extension Guidelines for Residue Management on Annual Range, 1982 and 2003; Jensen, Wayne, Estimating Grazing Capacity, Central Coast Agriculture Highlights, 1985; and SAGE Associates Cattle Grazing Suitability Site Visit Assessments 2007.

poss - possible
pot - potential
irr - irrigated



oak tree cover. At the time of the field assessment in August, adequate residual dry matter still remained showing a commitment to good stewardship practices by the owners even with a very unfavorable forage production year.

This column also includes the agricultural use for irrigated and dryland cropland at the time of the field assessment by soil type.

The ArD soil is used for irrigated crops, has a good range condition where grazed, and also has no palatable forage on dense brushland canopy areas.

Column 5: Agricultural water availability is summarized on the last page of the tables and is adequate over the ranch and the 13 proposed lots. Irrigation water wells, livestock and wildlife water troughs, reservoir, stock ponds, and creeks for livestock and wildlife water occur across the ranch. Approximately 563 acres of the ranch are in irrigated cropland.

Column 6: Cattle grazing distribution and access are good, good-fair, fair-poor, or none across the ranch and the 13 proposed lots depending on slope and canopy cover. The ArD soil area has good to no cattle distribution depending on canopy cover.

Column 7: Fencing of the ranch and the proposed lots is summarized at the end of the tables. Perimeter cattle-tight fencing of the ranch and most of the cropland/grazing interface areas is adequate. Fencing of most proposed lot boundaries is incomplete but can be completed as a condition of project approval, as necessary. Fencing of lot boundaries will not significantly affect crop production since dirt access roads (Photo 14) bisect cropland areas currently and can be relocated to parcel boundaries parallel to any new lot boundary fences. Some of the cropland lot boundaries are already fenced (Photo 24) or are separated by riparian corridors (Photos 5, 6, and 26 left).

Column 8: Site erosion is limited to naturally occurring incised creek banks along drainages and some landslides in the upland areas (Photo 22). The ArD soil shows no signs of erosion.

Column 9: Actual available dry forage in pounds per acre is taken from the calculations of Table 1 and further refined if necessary based on the site assessment of canopy cover, slopes, range condition, livestock water, and livestock distribution. The ArD soil has 350 pounds per acre of actual available dry forage based on the Sandy Range Site productivity. Cropland uses also occur on many of the soil types so livestock forage would not occur in the farmed areas unless suitable crop stubble was left for grazing or the areas were not farmed.

Column 10: Lists the acreage per soil types for each of the proposed lots. The ArD soil acreages are located within proposed lot #9 and include 29 acres of irrigated cropland, 11 acres of grazing land, and four acres of brushland and/or dense oak canopy.

Column 11: Taking the existing ranch and proposed lot acres from column 10 times the actual available forage in pounds per acre from column 9 gives the total site available dry forage for an average production year in pounds. The ArD soil has 29 acres of irrigated cropland that would produce 10,150 pounds of available dry forage if not farmed or irrigated; 11 acres of grazing land that produces 3,850 pounds of forage; and 4 acres of brushland that essentially produces no forage.

Column 12: Field mapping and planimetry determined specific acreage for each cropland and cattle grazing suitability classification. Please note, the suitability acreages are based on the suitability to farm or the suitability of cattle to graze these areas and to utilize the available forage.

The approximate cropland and cattle grazing suitability acreages for the existing ranch and the 13 proposed lots, are included as follows:

Higher suitability areas have no adverse constraints to cropland use or cattle grazing and consist of average slopes of 0 to 10 percent on predominately cultivated or grassland areas. Vegetative canopy cover averages 0 to 25 percent. Higher suitability are used for irrigated and dryland crop production and/or grazing and some areas could be expanded into for future potential or possible irrigated cropland usage.

Moderate suitability areas have slopes averaging 10 to 25 percent and are on narrow ridges or hillsides with canopy cover averaging less than 25 percent. These areas are used for grazing.

Lower suitability areas have slopes averaging greater than 25 to 40 percent on steeper hillside areas. Canopy cover averages 50 to 75 percent. These areas are used for grazing with livestock accessibility more difficult.

Unsuitable areas have a combination of adverse factors that negatively affect grazing such as slopes averaging greater than 40 percent, canopy cover of 100%, narrow creek channel areas, rock out crops, steep landslides. Cattle may graze or seek shelter in some of these areas. Wildlife will use these areas.

<u>Ranch or Lot #</u>	<u>Higher</u>	<u>Moderate</u>	<u>Lower</u>	<u>Unsuitable</u>
Ranch 3,934 acres	1,353 acres 34%	578 acres 15%	655 acres 17%	1,348 acres 34%
Lot #1 207 acres	176 acres 85%	19 acres 9%	6 acres 3%	6 acres 3%
Lot #2 178 acres	116 acres 66%	22 acres 12%	25 acres 14%	15 acres 8%

<u>Lot #</u>	<u>Higher</u>	<u>Moderate</u>	<u>Lower</u>	<u>Unsuitable</u>
Lot #3 147 acres	58 acres 40%	58 acres 40%	25 acres 16%	6 acres 4%
Lot #4 191 acres	106 acres 55%	52 acres 27%	26 acres 14%	7 acres 4%
Lot #5 152 acres	85 acres 56%	23 acres 15%	38 acres 25%	6 acres 4%
Lot #6 143 acres	110 acres 77%	0 acres 0%	22 acres 15%	11 acres 8%
Lot #7 213 acres	150 acres 71%	39 acres 18%	24 acres 11%	0 acres 0%
Lot #8 259 acres	100 acres 39%	69 acres 27%	34 acres 13%	56 acres 21%
Lot #9 450 acres	110 acres 25%	24 acres 5%	29 acres 6%	287 acres 64%
Lot #10 595 acres	151 acres 25%	9 acres 2%	82 acres 14%	353 acres 59%
Lot #11 429 acres	80 acres 19%	127 acres 28%	129 acres 30%	93 acres 23%
Lot #12 369 acres	59 acres 16%	128 acres 35%	119 acres 32%	63 acres 17%
Lot #13 601 acres	52 acres 9%	8 acres 1%	96 acres 16%	445 acres 74%

The above percentages show that the existing ranch is comprised of about equal percentages of Higher and Unsuitable land and similar percentages of Moderate and Lower suitability land. For our example, the ArD soil has Higher suitability areas (40 acres) and Unsuitable areas (4 acres).

Column 13: The historical carrying capacity of Rancho La Laguna was estimated by the ranch manager to be about 194 to 204 animal units per year. The proposed lot areas have not been individually grazed so no historic carrying capacity was available.

Column 14: The calculated cattle carrying capacity was formulated based on the cattle grazing suitability factors, and the total site available dry forage was finalized for each of the Soil Series.

To begin, from Table 1 the rangeland dry matter productivity for an average year was subtracted by each specific particular slope and soil type category RDM requirements from Table 2. (I.e. on 0 to 10 percent slope leave 400 pounds per acre; on 10 to 25 percent slope leave 500-600 pounds per acre; on the areas of 25 to 40 percent slopes leave 600-800 pounds per acre.

For example, in Table 2, the Arnold/ ArD Soil Series has a 0 to 10 percent average slope based on the topographic map and the field-observed slopes. These slope categories are close to the more regional USDA average slopes of 5 to 15 percent as estimated in the Soil Survey that has about a five-acre margin of detail.

For the 0 to 10 percent slope category that is predominately grassland 400 pounds per acre of RDM is to be left on the range each year. Thus, subtract 750 pounds per acre by 400 pounds per acre to arrive at the estimated available dry forage of 350 pounds per acre.

These estimates are based on the NRCS' Soil Survey forage-clipping estimates included for each Range Site and are not based on actual field clippings for this particular year. The 2006-2007-rainfall year had exceptionally below average forage production due to poor rainfall amounts and poor rainfall seasonal distribution.

Canopy cover is in the 0 to 25 percent category for the Arnold/ ArD soil. Thus, actual estimated available forage is illustrated in Table 2 that is unaffected by canopy cover for the Higher suitability areas. For the Unsuitable area, the canopy cover of brushland precludes palatable forage production and grazing.

Multiplying the ranch acreages and propose lot acreages of appropriate estimated available dry forage results in the total Range Site estimated dry forage for each slope category. Dividing the various forage production numbers by 11,000 pounds of dry forage consumption per animal unit per year yields a carrying capacity in animal units per year for at a moderate level of grazing for an average forage production year. The calculated cattle carrying capacity in animal units per year is shown in the last column of Table 2. By range management convention, an animal unit is 1,000 pounds of grazing animal so larger animals will consume more forage and smaller animals will consume less forage per overall animal weight. The Arnold/ ArD soil has a carrying capacity of 0.4 animal units per year for 11 acres of the Existing Ranch, and for proposed lot #9. Irrigated crops are grown on the 29 acres of ArD soil on proposed lot #9 which would have been capable of grazing about 0.9 animal units prior to conversion to irrigated cropland. Four acres of the ArD soil have no carrying capacity.

The carrying capacity calculations are made for an average forage production year at a sustainable moderate level of cattle grazing. Unfavorable years (such as this year) would produce significantly less forage and favorable years would produce considerably more forage. Heavier grazing pressure would also increase carrying capacity but is probably not sustainable over time. The historic carrying

capacity of Rancho La Laguna of 194-204 animal units per year and the calculated carrying capacities 172-227 animal units per year are very close.

In summary, the existing ranch and the 13 proposed lots have the following agricultural suitability and carrying capacity (Table 2 last page). The livestock grazing is ancillary to the overall agricultural viability because cropland has a much higher viability when compared to cattle grazing. The point totals from the county threshold of significance confirms this finding.

	Existing Irrigated Cropland	Potential Irrigated Cropland	Possible Irrigated Cropland	Existing Dryland Cropland	Existing Carrying Capacity
<u>Ranch</u> 3,934 acres	563 acres	24 acres	259 acres	18 acres	172-227 AU/Y
<u>Lot #1</u> 207 acres	75 acres	0 acres	0 acres	18 acres	11-19 AU/Y
<u>Lot #2</u> 178 acres	60 acres	0 acres	7 acres	0 acres	10-16 AU/Y
<u>Lot #3</u> 147 acres	48 acres	0 acres	3 acres	0 acres	7-11 AU/Y
<u>Lot #4</u> 191 acres	81 acres	0 acres	6 acres	0 acres	9-17 AU/Y
<u>Lot #5</u> 152 acres	40 acres	0 acres	0 acres	0 acres	11-15 AU/Y
<u>Lot #6</u> 143 acres	38 acres	0 acres	20 acres	0 acres	9-13 AU/Y
<u>Lot #7</u> 213 acres	65 acres	0 acres	22 acres	0 acres	12-19 AU/Y
<u>Lot #8</u> 259 acres	49 acres	0 acres	23 acres	0 acres	13-18 AU/Y
<u>Lot #9</u> 450 acres	29 acres	0 acres	4 acres	0 acres	11-12 AU/Y
<u>Lot #10</u> 595 acres	0 acres	0 acres	143 acres	0 acres	22 AU/Y
<u>Lot #11</u> 429 acres	20 acres	0 acres	29 acres	0 acres	30-32 AU/Y

	Existing Irrigated Cropland	Potential Irrigated Cropland	Possible Irrigated Cropland	Existing Dryland Cropland	Existing Carrying Capacity
<u>Lot #12</u> 369 acres	39 acres	0 acres	2 acres	0 acres	18-22 AU/Y
<u>Lot #13</u>	19 acres	24 acres	0 acres	0 acres	9-11 AU/Y

Approximately 35 acres of potential cropland were identified on the Proposed Lot Map, however, due to constraints from oak trees and the proximity of Zaca Creek the potential cropland is more realistically about 24 acres. Possible cropland areas were identified in the field assessments and may be possible for future crop production.

C. Agricultural Suitability Point Totals

See the Table 3 summary for the various point combinations for the determination of agricultural viability and the thresholds of significance for the existing Rancho La Laguna and for each of the 13 proposed lots.

Parcel Size

Rancho La Laguna and the proposed lots 1 to 13 receive 15 ER, 11, 11, 11, 11, 11, 11, 11, 12, 13, 12, 12, and 13 points, respectively based on their net acreages.

Soil Classification

Percentages of capability class I, II, III, IV, VI, VII, and VIII were calculated for the ranch and the proposed 13 lots. Irrigated soil classes were used only for existing irrigated acreages. Respective points are 5.6 ER, 7, 8.5, 7.8, 8.7, 8, 7.7, 8.1, 7.2, 4.5, 4.2, 4.5, 5.2, and 3.6. Points vary based on percentage change of capability classes as compared to overall proposed lot acreages and the existing ranch. Meaning that some of the proposed lots having a higher percentage of prime soils will have a higher total soil point value.

Water Availability

Irrigation and livestock water is available for the ranch and for the proposed lots, therefore, each receives 15 points.

Agricultural Suitability

For crops, the acreage of suitable cropland for each category is shown along with the respective points. Acreages for the proposed lots are less than for the total ranch, (as deducted for Parcel Size), however, the percentages of highly suitable

TABLE 3: RANCHO LA LAGUNA AGRICULTURAL VIABILITY AND THRESHOLDS OF SIGNIFICANCE SUMMARY

Agricultural Threshold Summary Factors	Points Possible	Existing Rancho La Laguna Agricultural Viability	Proposed Lot #1 Agricultural Viability	Proposed Lot #2 Agricultural Viability	Proposed Lot #3 Agricultural Viability
PARCEL SIZE					
<5 acres	0 to 3				
5 acres to <10 acres	4 to 6				
10 acres to <40 acres	7 to 8				
40 acres to <100 acres	9 to 10				
100 acres to <500 acres	11 to 12		11 (207 ac)	11 (178 ac)	11 (147 ac)
500 acres to <1,000 acres	13 to 14				
1,000 acres or greater	15	15 (3,934 ac)			
SOIL CLASSIFICATION					
Class I (prime soil)	14 to 15	0.17(1.1%)	0	0	0
Class II (prime soil)	11 to 13	1.38(10.6%)	3.58(27.5%)	4.24(32.6%)	3.45(26.5%)
Class III	8 to 10	0.65(6.5%)	1.3(13%)	1.35(13.5%)	1.09(10.9%)
Class IV	6 to 7	0.66(9.3%)	0.51(7.3%)	0.74(10.6%)	0.29(4.1%)
Class VI	1 to 5	1.78(35.5%)	1.42(47.3%)	2.17(43.3%)	2.93(58.5%)
Class VII	1 to 5	0.99(33%)	0.15(4.9%)	0	0
Class VIII	0	0(4%)	0	0	0
Total Soil Points		5.6	7	8.5	7.8
WATER AVAILABILITY					
Land has an adequate water supply for crops or grazing.	12 to 15	15	15	15	15
Land has water, but may be marginal for crops or grazing.	8 to 11				
Land does not have water but supply is potentially available.	3 to 7				
Land does not have water supply is not potentially available.	0 to 2				
AGRICULTURAL SUITABILITY					
<u>Crops:</u>					
Highly suitable for irrigated crops.	8 to 10	10 (563 ac irr)	10 (75 ac irr/18 acs dryland)	10 (60 ac irr/7 acs possible)	10 (48 ac irr/3 acs possible)
Highly suitable for irrigated crops or dry farming.	6 to 8				
Low-Moderate suitability for irrigated crops or dry farming.	1 to 5				
Unsuitable for crop production.	0				
<u>Grazing:</u>					
Highly suitable for pasture or range	6 to 10	8(172-227 AU/YR)			
Moderately suitable for pasture or range.	3 to 5		5(11-19 AU/YR)	4(10-16 AU/YR)	3(7-11 AU/YR)
Low suitability for pasture or range.	1 to 2				
Unsuitable for pasture or range.	0				
EXISTING AND HISTORICAL LAND USE					
In active agricultural production.	5	5	5	5	5
In maintained pasture/range.	5				
Unmaintained, but productive in last 10 years.	3 to 5				
Vacant land.	1 to 3				
Substantial development onsite.	0				
COMPREHENSIVE PLAN DESIGNATION					
A-II	5	5	5	5	5
ADJACENT LAND USES					
Surrounded by agricultural operations or open space in a region with adequate support uses agricultural support facilities.	9 to 10	10	10	10	10
AGRICULTURAL PRESERVE POTENTIAL					
Is in agricultural preserve.	5 to 7	7			
Can qualify as prime or non-prime preserve	1 to 7		7	7	7
COMBINED FARMING OPERATION					
Provides a small component of a combined farming operation.	1	1	1	1	1
No combined operation.	0				
TOTAL POINTS					
60 or greater is considered a potentially significant agricultural resource		81.6	76	76.5	74.8

Source: County of Santa Barbara Environmental Thresholds and Guidelines Manual, revised October 2002 with Replacement Pages July 2003.

TABLE 3: RANCHO LA LAGUNA AGRICULTURAL VIABILITY AND THRESHOLDS OF SIGNIFICANCE SUMMARY

Agricultural Threshold Summary Factors	Points Possible	Proposed Lot #4 Agricultural Viability	Proposed Lot #5 Agricultural Viability	Proposed Lot #6 Agricultural Viability	Proposed Lot #7 Agricultural Viability
PARCEL SIZE					
<5 acres	0 to 3				
5 acres to <10 acres	4 to 6				
10 acres to <40 acres	7 to 8				
40 acres to <100 acres	9 to 10				
100 acres to <500 acres	11 to 12	11 (191 ac)	11 (152 ac)	11 (143 ac)	11 (213 ac)
500 acres to <1,000 acres	13 to 14				
1,000 acres or greater	15				
SOIL CLASSIFICATION					
Class I (prime soil)	14 to 15	0	3.86(25.7%)	0.63(4.2%)	0
Class II (prime soil)	11 to 13	5.17(39.8%)	0.09(0.7%)	2.9(22.3%)	3.72(28.6%)
Class III	8 to 10	0.63(5.8%)	0.72(7.2%)	0.42(4.2%)	1.5(15%)
Class IV	6 to 7	0.69(9.9%)	0.41(5.9%)	1.42(20.3%)	1.1(15%)
Class VI	1 to 5	2.18(33.5%)	2.73(54.6%)	2.1(42%)	1.37(27.3%)
Class VII	1 to 5	0	0.18(5.9%)	0.21(7%)	0.42(14.1%)
Class VIII	0	0	0	0	0
Total Soil Points		8.7	8	7.7	8.1
WATER AVAILABILITY					
Land has an adequate water supply for crops or grazing.	12 to 15	15	15	15	15
Land has water, but may be marginal for crops or grazing.	8 to 11				
Land does not have water but supply is potentially available.	3 to 7				
Land does not have water supply is not potentially available.	0 to 2				
AGRICULTURAL SUITABILITY					
<u>Crops:</u>					
Highly suitable for irrigated crops.	8 to 10	10 (81 ac irr/6 acs possible)	10 (40 ac irr)	10 (38 ac irr/ 20 acs possible)	10 (65 ac irr/ 22 acs possible)
Highly suitable for irrigated crops or dry farming.	6 to 8				
Low-Moderate suitability for irrigated crops or dry farming.	1 to 5				
Unsuitable for crop production.	0				
<u>Grazing:</u>					
Highly suitable for pasture or range	6 to 10				
Moderately suitable for pasture or range.	3 to 5	4(9-17 AU/YR)	4(11-15 AU/YR)	3(9-13 AU/YR)	4(12-19 AU/YR)
Low suitability for pasture or range.	1 to 2				
Unsuitable for pasture or range.	0				
EXISTING AND HISTORICAL LAND USE					
In active agricultural production.	5	5	5	5	5
In maintained pasture/range.	5				
Unmaintained, but productive in last 10 years.	3 to 5				
Vacant land.	1 to 3				
Substantial development onsite.	0				
COMPREHENSIVE PLAN DESIGNATION					
A-II	5	5	5	5	5
ADJACENT LAND USES					
Surrounded by agricultural operations or open space in a region with adequate support uses	9 to 10	10	10	10	10
agricultural support facilities.					
AGRICULTURAL PRESERVE POTENTIAL					
Is in agricultural preserve	5 to 7				
Can qualify as prime or non-prime preserve	1 to 7	7	7	6	7
COMBINED FARMING OPERATION					
Provides a small component of a combined farming operation.	1	1	1	1	1
No combined operation.	0				
TOTAL POINTS		76.7	76	73.7	76.1
60 or greater is considered a potentially significant agricultural resource					

Source: County of Santa Barbara Environmental Thresholds and Guidelines Manual, revised October 2002 with Replacement Pages July 2003.

TABLE 3: RANCHO LA LAGUNA AGRICULTURAL VIABILITY AND THRESHOLDS OF SIGNIFICANCE SUMMARY

Agricultural Threshold Summary Factors	Points Possible	Proposed Lot #8 Agricultural Viability	Proposed Lot #9 Agricultural Viability	Proposed Lot #10 Agricultural Viability	Proposed Lot #11 Agricultural Viability
PARCEL SIZE					
<5 acres	0 to 3				
5 acres to <10 acres	4 to 6				
10 acres to <40 acres	7 to 8				
40 acres to <100 acres	9 to 10				
100 acres to <500 acres	11 to 12	11 (259 ac)	12 (450 ac)		12 (429 ac)
500 acres to <1,000 acres	13 to 14			13 (595 ac)	
1,000 acres or greater	15				
SOIL CLASSIFICATION					
Class I (prime soil)	14 to 15	0	0	0	0
Class II (prime soil)	11 to 13	2.46(18.9%)	0	0	0.61(4.7%)
Class III	8 to 10	1.16(11.6%)	0.02(0.2%)	0.25(2.5%)	0.28(2.8%)
Class IV	6 to 7	1.7(24.3%)	1.46(21%)	0.59(8.4%)	0.29(4.2%)
Class VI	1 to 5	1.2(23.9%)	1.55(30%)	1.9(38%)	1.59(31.7%)
Class VII	1 to 5	0.64(21.2%)	1.45(48.8%)	1.47(49%)	1.7(56.6%)
Class VIII	0	0	0	0	0
Total Soil Points		7.2	4.5	4.2	4.5
WATER AVAILABILITY					
Land has an adequate water supply for crops or grazing.	12 to 15	15	15	15	15
Land has water, but may be marginal for crops or grazing.	8 to 11				
Land does not have water but supply is potentially available.	3 to 7				
Land does not have water supply is not potentially available.	0 to 2				
AGRICULTURAL SUITABILITY					
Crops:					
Highly suitable for irrigated crops.	8 to 10	10 (49 ac irr/23 acs possible)			
Highly suitable for irrigated crops or dry farming.	6 to 8				6 (20 ac irr/29 acs possible)
Low-Moderate suitability for irrigated crops or dry farming.	1 to 5		5 (29 ac irr/4 acs possible)	5 (143 acs possible)	
Unsuitable for crop production.	0				
Grazing:					
Highly suitable for pasture or range	6 to 10				6(30-32 AU/YR)
Moderately suitable for pasture or range.	3 to 5	4(13-18 AU/YR)	3(11-12 AU/YR)	5(22 AU/YR)	(controlled burn)
Low suitability for pasture or range.	1 to 2				
Unsuitable for pasture or range.	0				
EXISTING AND HISTORICAL LAND USE					
In active agricultural production.	5	5	5	5	5
In maintained pasture/range.	5				
Unmaintained, but productive in last 10 years.	3 to 5				
Vacant land.	1 to 3				
Substantial development onsite.	0				
COMPREHENSIVE PLAN DESIGNATION					
A-II	5	5	5	5	5
ADJACENT LAND USES					
Surrounded by agricultural operations or open space in a region with adequate support uses agricultural support facilities.	9 to 10	10	10	10	10
AGRICULTURAL PRESERVE POTENTIAL					
Is in agricultural preserve.	5 to 7				
Can qualify as prime or non-prime preserve	1 to 7	7	6	6	6
COMBINED FARMING OPERATION					
Provides a small component of a combined farming operation.	1	1	1	1	1
No combined operation.	0				
TOTAL POINTS					
60 or greater is considered a potentially significant agricultural resource		75.2	67.5	69.2	70.5

Source: County of Santa Barbara Environmental Thresholds and Guidelines Manual, revised October 2002 with Replacement Pages July 2003.

TABLE 3: RANCHO LA LAGUNA AGRICULTURAL VIABILITY AND THRESHOLDS OF SIGNIFICANCE SUMMARY

Agricultural Threshold Summary Factors	Points Possible	Proposed Lot #12 Agricultural Viability	Proposed Lot #13 Agricultural Viability
PARCEL SIZE			
<5 acres	0 to 3		
5 acres to <10 acres	4 to 6		
10 acres to <40 acres	7 to 8		
40 acres to <100 acres	9 to 10		
100 acres to <500 acres	11 to 12	12 (369 ac)	
500 acres to <1,000 acres	13 to 14		13 (601 acs)
1,000 acres or greater	15		
SOIL CLASSIFICATION			
Class I (prime soil)	14 to 15	0	0
Class II (prime soil)	11 to 13	1.38(10.6%)	0.42 (3.2%)
Class III	8 to 10	0.11 (1.1%)	0.57 (5.7%)
Class IV	6 to 7	0.04 (0.5%)	0.1(1.3%)
Class VI	1 to 5	2.52(50.4%)	0.9(18%)
Class VII	1 to 5	1.15(28.7%)	1.6(53%)
Class VIII	0	0(8.7%)	0(18%)
Total Soil Points		5.2	3.6
WATER AVAILABILITY			
Land has an adequate water supply for crops or grazing.	12 to 15	15	15
Land has water, but may be marginal for crops or grazing.	8 to 11		
Land does not have water but supply is potentially available.	3 to 7		
Land does not have water supply is not potentially available.	0 to 2		
AGRICULTURAL SUITABILITY			
<u>Crops:</u>			
Highly suitable for irrigated crops.	8 to 10		
Highly suitable for irrigated crops or dry farming.	6 to 8	7 (39 ac irr/2 acs possible)	6 (19 ac irr/24 acs potential)
Low-Moderate suitability for irrigated crops or dry farming.	1 to 5		
Unsuitable for crop production.	0		
<u>Grazing:</u>			
Highly suitable for pasture or range	6 to 10		
Moderately suitable for pasture or range.	3 to 5	5(18-22 AU/YR)	
Low suitability for pasture or range.	1 to 2	(controlled burn)	2(9-11 AU/YR)
Unsuitable for pasture or range.	0		
EXISTING AND HISTORICAL LAND USE			
In active agricultural production.	5	5	5
In maintained pasture/range.	5		
Unmaintained, but productive in last 10 years.	3 to 5		
Vacant land.	1 to 3		
Substantial development onsite.	0		
COMPREHENSIVE PLAN DESIGNATION			
A-II	5	5	5
ADJACENT LAND USES			
Surrounded by agricultural operations or open space in a region with adequate support uses agricultural support facilities.	9 to 10	10	10
AGRICULTURAL PRESERVE POTENTIAL			
Is in agricultural preserve.	5 to 7		
Can qualify as prime or non-prime preserve	1 to 7	7	6
COMBINED FARMING OPERATION			
Provides a small component of a combined farming operation.	1	1	1
No combined operation.	0		
TOTAL POINTS		72.2	66.6
60 or greater is considered a potentially significant agricultural resource			

Source: County of Santa Barbara Environmental Thresholds and Guidelines Manual, revised October 2002 with Replacement Pages July 2003.

cropland acreages are greater than the ranch for proposed lots 1, 2, 3, 4, 5, 6, 7, and 8. Respective points are 10 ER, 10, 10, 10, 10, 10, 10, 10, 5, 5, 6, 7, and 6.

Grazing is ancillary to the crop production viability on each of the proposed lots. The remaining grazing areas on the proposed lots are moderately suited for cattle grazing and receive the following respective points 8 ER, 5, 4, 3, 4, 4, 3, 4, 4, 3, 5, 6, 5, and 2.

Existing and Historical Uses

The ranch and the proposed lot areas are in active agricultural production so each will receive 5 points.

Comprehensive Plan Designation

The ranch is A-II and the proposed lots would continue to have that designation so each receive 5 points.

Adjacent Land Uses

The ranch and the proposed lots are bordered by agricultural operations in an agricultural area with support facilities, therefore, all receive 10 points.

Agricultural Preserve Potential

The ranch is currently under Land Conservation Act contract and the proposed lots should also qualify for contracts. Respective points are 7 for proposed lots #1, 2, 3, 4, 5, 7, 8, and 9 that have greater than 40 acres of prime land. Respective points are 6 for proposed lots #6, 9, 10, 11, and 13 since these lots have the possibility of 40 acres or more of prime land and/or are several hundred acres in size.

Combined Farming Operation

The cropland is leased at this time but could be combined in the future by a lessee operating on several of the individual proposed lots. One point is given for the ER and each proposed lot.

TOTAL POINTS

Existing Ranch = 81.6 points

Lot #1 = 76 points

Lot #2 = 76.5 points

Lot #3 = 74.8 points

Lot #4 = 76.7 points

Lot #5 = 76 points

Lot #6 = 73.7 points

Lot #7 = 76.1 points

Lot #8 = 75.2 points

Lot #9 = 67.5 points

Lot #10 = 69.2 points

Lot #11 = 70.5 points

Lot # 12 = 72.2 points

Lot #13 = 66.6 points

Conclusions

The agricultural viability of Rancho La Laguna and of the thirteen proposed lots are all above 60 points so no significant effect on agricultural resources should occur by the parcelization. Each of the proposed lots should be agriculturally viable because of the irrigated cropland productivity and revenues coupled with the ancillary livestock grazing on the rangeland areas.

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Offices in
Santa Barbara
Mammoth Lakes

September 28, 2009

MNS Engineers, Inc.
201 Industrial Way
Buellton, CA 93427

Attention: Ms. Tish Beltranena, Principal Planner
Subject: Second Follow-up Site Visit for Rancho La Laguna

Dear Tish:

As a further follow-up to the February 17, 2009 Santa Barbara County Planning & Development meeting, I have completed a second site visit to Rancho La Laguna.

Discussions at the county meeting focused on the agricultural viability of proposed Lots 9 and 10. The Rancho la Laguna representatives indicated that they would expand the agricultural production on those two lots to help demonstrate future viability. I utilized your maps and acreage calculations for my field analysis.

I also wanted to take a look at the current crop production and grazing on the overall ranch to assess current viability.

Lastly, some of the proposed lot acreages are slightly different between the August 2006 and the September 2009 tract maps so I wanted to assess in the field whether or not there would be any significant point changes.

My observations included the following:

- Proposed Lot 9: The crop irrigation system is installed with buried distribution lines that are being utilized for drip irrigation of a tomatillo crop. Approximately 20.1 acres are cultivated with areas planted in tomatillos. The crop was weed free and well maintained. No erosion was observed. Attached Photos 1, 2, and 3 show the crop production in the two fields and the ortho-photo map shows the photo locations. These areas must now be considered highly suitable for irrigated crop production that would substantiate a point total of at least 67.5 points or higher, which is considered viable per county thresholds of significance criteria.

- Proposed Lot #10: Field #1 containing 4.2 acres has been cleared and cultivated but not planted. This field is adjacent to irrigated tomatillos and when irrigated would qualify as prime soil. A crop irrigation system with distribution lines and drip irrigation was established on a 7.2-acre portion of prime soils that are being



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irrigated in beans in field #2. Photos 4, 5, and 6 show these areas with the photos located on the ortho-photo. These areas must also be considered highly suitable for irrigated crop production that would substantiate the point total of at least 70.2 points or higher, which is considered viable per county thresholds of significance criteria.

- The ranch cattle herd has been improved since the previous site visits beginning in August 2007, and consists of Angus cows, calves, and bulls that are in excellent condition. Rangeland residual dry matter was more than adequate and the range was in good condition.
- Crops observed grown on the ranch included hay, grain, and irrigated beans, squash, peppers, and tomatillos. No erosion was observed and the crops appear to be free of weeds at harvest. Large labor crews were observed harvesting tomatillos. Some areas were double-cropped in hay/grain, and tomatillos.
- The revised proposed lot line modifications does not appreciably affect the point totals for each lot as summarized in the September 2007 Rancho La Laguna Agricultural Viability Study and Rangeland Assessment prepared by Sage Associates. A change of plus or minus a point or so may occur with overall point totals still well above 60 for each of the proposed lots.

Prior observations made during the last site visit are still valid today including:

- Equipment and corrals appeared to be well maintained with late model or new tractors on the ranch.
- The physical location of the ranch is across the road from the Zaca Mesa vineyards and other vineyards and crop production are also nearby. Prior to 1970 these vineyards did not exist so intensified agricultural usage has been highly successful in the area. The large labor crew observed harvesting tomatillos suggests that labor is readily available for cultural and harvest activities.
- More remote agricultural areas are often sought after by organic farmers in order to reduce pesticide drift impacts and residual herbicide build up in previously farmed soils.

The additional site visits have provided further insight into the agricultural viability of Rancho La Laguna and the proposed lots. In conclusion, the agricultural viability of the thirteen proposed lots are all above 60 points, so no significant effect on agricultural resources should occur by the proposed parcelization as based on the Santa Barbara County Thresholds of Significance criteria for Agricultural Resources. Each of the



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proposed lots should be agriculturally viable because of the irrigated cropland productivity and revenues, coupled with the ancillary livestock grazing of the rangeland and harvested cropland stubble areas.

If you have any questions, please do not hesitate to contact me.

Sincerely:

Orrin Sage

Orrin Sage, Ph.D.
Principal



Photo 1: Lot 9 field #1 irrigated tomatillos.



Photo 2: Lot 9 field #1 irrigated tomatillos.



Photo 3: Lot 9 field #2 irrigated tomatillo.



Photo 4: Lot 10 field #1 cultivated prime soils when irrigated.



Photo 5: Lot 10 field #2 irrigated beans on prime soil.

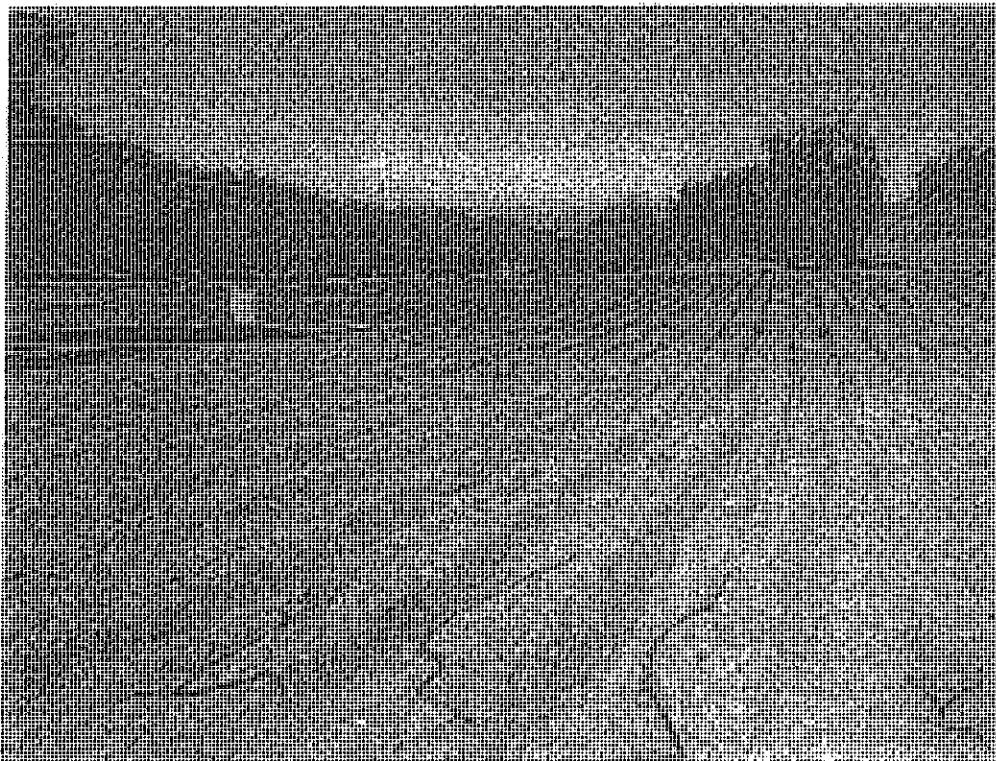


Photo 6: Lot 10 field #2 irrigated beans on prime soil.

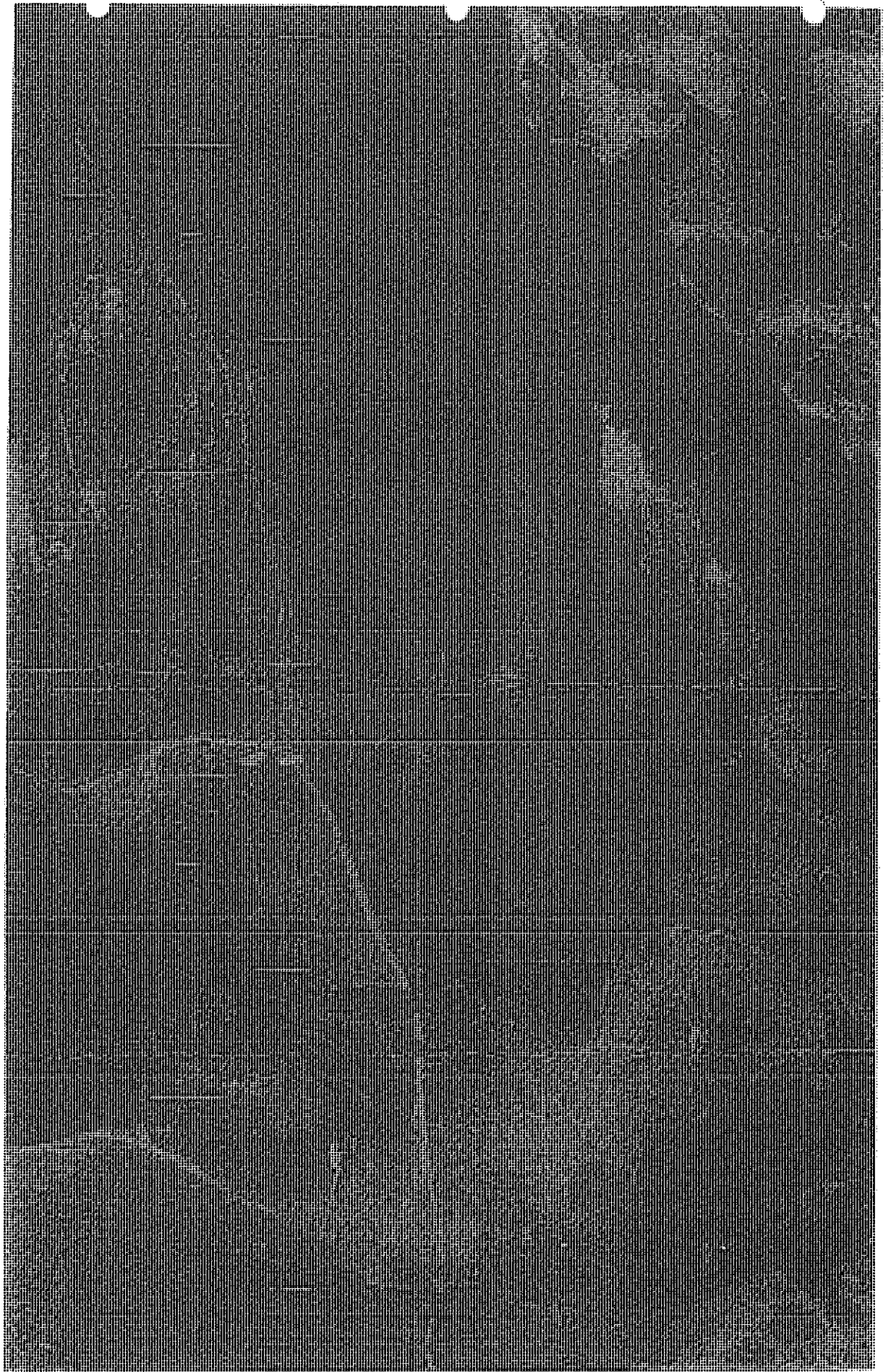




TABLE 3: RANCHO LA LAGUNA AGRICULTURAL VIABILITY AND THRESHOLDS OF SIGNIFICANCE SUMMARY

Agricultural Threshold Summary Factors	Points Possible	Existing Rancho La Laguna Agricultural Viability	Proposed Lot #1 Agricultural Viability	Proposed Lot #2 Agricultural Viability	Proposed Lot #3 Agricultural Viability
PARCEL SIZE					
<5 acres	0 to 3				
5 acres to <10 acres	4 to 6				
10 acres to <40 acres	7 to 8				
40 acres to <100 acres	9 to 10				
100 acres to <500 acres	11 to 12		11 (207 ac)	11 (178 ac)	11 (147 ac)
500 acres to <1,000 acres	13 to 14				
1,000 acres or greater	15	15 (3,934 ac)			
SOIL CLASSIFICATION					
Class I (prime soil)	14 to 15	0.17(1.1%)	0	0	0
Class II (prime soil)	11 to 13	1.38(10.6%)	3.58(27.3%)	4.24(32.6%)	3.45(26.5%)
Class III	8 to 10	0.65(6.5%)	1.3(13%)	1.35(18.5%)	1.09(10.9%)
Class IV	6 to 7	0.66(9.3%)	0.51(7.3%)	0.74(10.6%)	0.29(4.1%)
Class VI	1 to 5	1.78(35.5%)	1.42(47.3%)	2.17(43.3%)	2.93(58.5%)
Class VII	1 to 5	0.99(33%)	0.15(4.9%)	0	0
Class VIII	0	0(4%)	0	0	0
Total Soil Points		5.6	7	6.5	7.8
WATER AVAILABILITY					
Land has an adequate water supply for crops or grazing.	12 to 15	15	15	15	15
Land has water, but may be marginal for crops or grazing.	8 to 11				
Land does not have water but supply is potentially available.	3 to 7				
Land does not have water supply is not potentially available.	0 to 2				
AGRICULTURAL SUITABILITY					
<u>Crops:</u>					
Highly suitable for irrigated crops.	8 to 10	10 (563 ac irr)	10 (75 ac irr/18 acs dryland)	10 (60 ac irr/7 acs possible)	10 (48 ac irr/3 acs possible)
Highly suitable for irrigated crops or dry farming.	6 to 8				
Low-Moderate suitability for irrigated crops or dry farming.	1 to 5				
Unsuitable for crop production.	0				
<u>Grazing:</u>					
Highly suitable for pasture or range	6 to 10	8(172-227 AU/YR)			
Moderately suitable for pasture or range.	3 to 5		5(11-19 AU/YR)	4(10-16 AU/YR)	3(7-11 AU/YR)
Low suitability for pasture or range.	1 to 2				
Unsuitable for pasture or range.	0				
EXISTING AND HISTORICAL LAND USE					
In active agricultural production.	5	5	5	5	5
In maintained pasture/range.	5				
Unmaintained, but productive in last 10 years.	3 to 5				
Vacant land.	1 to 3				
Substantial development onsite.	0				
COMPREHENSIVE PLAN DESIGNATION					
A-II	5	5	5	5	5
ADJACENT LAND USES					
Surrounded by agricultural operations or open space in a region with adequate support uses agricultural support facilities.	9 to 10	10	10	10	10
AGRICULTURAL PRESERVE POTENTIAL					
Is in agricultural preserve.	5 to 7	7			
Can qualify as prime or non-prime preserve	1 to 7		7	7	7
COMBINED FARMING OPERATION					
Provides a small component of a combined farming operation.	1	1	1	1	1
No combined operation.	0				
TOTAL POINTS		81.6	76	76.5	74.8
60 or greater is considered a potentially significant agricultural resource					

Source: County of Santa Barbara Environmental Thresholds and Guidelines Manual, revised October 2002 with Replacement Pages July 2003.

TABLE 3: RANCHO LA LAGUNA AGRICULTURAL VIABILITY AND THRESHOLDS OF SIGNIFICANCE SUMMARY

Agricultural Threshold Summary Factors	Points Possible	Proposed Lot #4 Agricultural Viability	Proposed Lot #5 Agricultural Viability	Proposed Lot #6 Agricultural Viability	Proposed Lot #7 Agricultural Viability
PARCEL SIZE					
<5 acres	0 to 3				
5 acres to <10 acres	4 to 6				
10 acres to <40 acres	7 to 8				
40 acres to <100 acres	9 to 10				
100 acres to <500 acres	11 to 12	11 (191 ac)	11 (252 ac)	11 (143 ac)	11 (213 ac)
500 acres to <1,000 acres	13 to 14				
1,000 acres or greater	15				
SOIL CLASSIFICATION					
Class I (prime soil)	14 to 15	0	3.86(25.7%)	0.63(4.2%)	0
Class II (prime soil)	11 to 13	5.17(39.6%)	0.09(0.7%)	2.9(22.3%)	3.72(28.6%)
Class III	8 to 10	0.68(6.8%)	0.72(7.2%)	0.42(4.2%)	1.5(15%)
Class IV	6 to 7	0.69(9.9%)	0.41(5.9%)	1.42(20.3%)	1.1(15%)
Class VI	1 to 5	2.18(43.5%)	2.73(54.6%)	2.1(42%)	1.37(27.3%)
Class VII	1 to 5	0	0.18(5.9%)	0.21(7%)	0.42(14.1%)
Class VIII	0	0	0	0	0
Total Soil Points		8.7	8	7.7	6.1
WATER AVAILABILITY					
Land has an adequate water supply for crops or grazing.	12 to 15	15	15	15	15
Land has water, but may be marginal for crops or grazing.	8 to 11				
Land does not have water but supply is potentially available.	3 to 7				
Land does not have water supply is not potentially available.	0 to 2				
AGRICULTURAL SUITABILITY					
<u>Crops:</u>					
Highly suitable for irrigated crops.	6 to 10	10 (81 ac irr/6 acs possible)	10 (40 ac irr)	10 (38 ac irr/ 20 acs possible)	10 (65 ac irr/ 22 acs possible)
Highly suitable for irrigated crops or dry farming.	6 to 8				
Low-Moderate suitability for irrigated crops or dry farming.	1 to 5				
Unsuitable for crop production.	0				
<u>Grazing:</u>					
Highly suitable for pasture or range	6 to 10				
Moderately suitable for pasture or range.	3 to 5	4(9-17 AU/YR)	4(11-15 AU/YR)	3(9-13 AU/YR)	4(12-19 AU/YR)
Low suitability for pasture or range.	1 to 2				
Unsuitable for pasture or range.	0				
EXISTING AND HISTORICAL LAND USE					
In active agricultural production.	5	5	5	5	5
In maintained pasture/range.	5				
Unmaintained, but productive in last 10 years.	3 to 5				
Vacant land.	1 to 3				
Substantial development onsite.	0				
COMPREHENSIVE PLAN DESIGNATION					
A-II	5	5	5	5	5
ADJACENT LAND USES					
Surrounded by agricultural operations or open space in a region with adequate support uses agricultural support facilities.	9 to 10	10	10	10	10
AGRICULTURAL PRESERVE POTENTIAL					
Is in agricultural preserve	5 to 7				
Can qualify as prime or non-prime preserve	1 to 7	7	7	6	7
COMBINED FARMING OPERATION					
Provides a small component of a combined farming operation.	1	1	1	1	1
No combined operation.	0				
TOTAL POINTS		76.7	76	73.7	75.1
60 or greater is considered a potentially significant agricultural resource					

Source: County of Santa Barbara Environmental Thresholds and Guidelines Manual, revised October 2002 with Replacement Pages July 2003.

TABLE 3: RANCHO LA LAGUNA AGRICULTURAL VIABILITY AND THRESHOLDS OF SIGNIFICANCE SUMMARY

Agricultural Threshold Summary Factors	Points Possible	Proposed Lot #8 Agricultural Viability	Proposed Lot #9 Agricultural Viability	Proposed Lot #10 Agricultural Viability	Proposed Lot #11 Agricultural Viability
PARCEL SIZE					
<5 acres	0 to 3				
5 acres to <10 acres	4 to 6				
10 acres to <40 acres	7 to 8				
40 acres to <100 acres	9 to 10				
100 acres to <500 acres	11 to 12	11 (259 ac)	12 (450 ac)		12 (429 ac)
500 acres to <1,000 acres	13 to 14			13 (593 ac)	
1,000 acres or greater	15				
SOIL CLASSIFICATION					
Class I (prime soil)	14 to 15	0	0	0	0
Class II (prime soil)	11 to 13	2.46(18.9%)	0	0	0.61(4.7%)
Class III	8 to 10	1.16(11.6%)	0.02(0.2%)	0.25(2.5%)	0.28(2.8%)
Class IV	6 to 7	1.7(24.3%)	1.46(21%)	0.59(8.4%)	0.29(4.2%)
Class VI	1 to 5	1.2(23.9%)	1.55(30%)	1.9(38%)	1.59(31.7%)
Class VII	1 to 5	0.64(21.2%)	1.45(48.8%)	1.47(49%)	1.7(56.6%)
Class VIII	0	0	0	0	0
Total Soil Points		7.2	4.5	4.2	4.5
WATER AVAILABILITY					
Land has an adequate water supply for crops or grazing.	12 to 15	15	15	15	15
Land has water, but may be marginal for crops or grazing.	8 to 11				
Land does not have water but supply is potentially available.	3 to 7				
Land does not have water supply is not potentially available.	0 to 2				
AGRICULTURAL SUITABILITY					
<u>Crops:</u>					
Highly suitable for irrigated crops.	8 to 10	10 (49 ac irr/23 acs possible)			6 (20 ac irr/29 acs possible)
Highly suitable for irrigated crops or dry farming.	6 to 8				
Low-Moderate suitability for irrigated crops or dry farming.	1 to 5		5 (29 ac irr/4 acs possible)	5 (143 acs possible)	
Unsuitable for crop production.	0				
<u>Grazing:</u>					
Highly suitable for pasture or range	6 to 10				6(30-32 AU/YR)
Moderately suitable for pasture or range.	3 to 5	4(13-18 AU/YR)	3(11-12 AU/YR)	5(22 AU/YR)	(controlled burn)
Low suitability for pasture or range.	1 to 2				
Unsuitable for pasture or range.	0				
EXISTING AND HISTORICAL LAND USE					
In active agricultural production.	5	5	5	5	5
In maintained pasture/range.	5				
Unmaintained, but productive in last 10 years.	3 to 5				
Vacant land.	1 to 3				
Substantial development onsite.	0				
COMPREHENSIVE PLAN DESIGNATION					
A-II	5	5	5	5	5
ADJACENT LAND USES					
Surrounded by agricultural operations or open space in a region with adequate support uses agricultural support facilities.	9 to 10	10	10	10	10
AGRICULTURAL PRESERVE POTENTIAL					
Is in agricultural preserve.	5 to 7				
Can qualify as prime or non-prime preserve	1 to 7	7	6	6	6
COMBINED FARMING OPERATION					
Provides a small component of a combined farming operation.	1	1	1	1	1
No combined operation.	0				
TOTAL POINTS		75.2	67.5	69.2	70.5
60 or greater is considered a potentially significant agricultural resource					

Source: County of Santa Barbara Environmental Thresholds and Guidelines Manual, revised October 2002 with Replacement Pages July 2003.

**TABLE 3: RANCHO LA LAGUNA AGRICULTURAL VIABILITY AND THRESHOLDS OF SIGNIFICANCE
SUMMARY**

Agricultural Threshold Summary Factors	Points Possible	Proposed Lot #12 Agricultural Viability	Proposed Lot #13 Agricultural Viability
PARCEL SIZE			
<5 acres	0 to 3		
5 acres to <10 acres	4 to 6		
10 acres to <40 acres	7 to 8		
40 acres to <100 acres	9 to 10		
100 acres to <500 acres	11 to 12	12 (369 ac)	
500 acres to <1,000 acres	13 to 14		13 (601 acs)
1,000 acres or greater	15		
SOIL CLASSIFICATION			
Class I (prime soil)	14 to 15	0	0
Class II (prime soil)	11 to 13	1.38(10.5%)	0.42(3.2%)
Class III	8 to 10	0.11(1.1%)	0.57(5.7%)
Class IV	6 to 7	0.04(0.5%)	0.1(1.3%)
Class VI	1 to 5	2.52(20.4%)	0.9(10%)
Class VII	1 to 5	1.15(28.7%)	1.6(53%)
Class VIII	0	0(8.7%)	0(18%)
Total Soil Points		5.2	3.6
WATER AVAILABILITY			
Land has an adequate water supply for crops or grazing.	12 to 15	15	15
Land has water, but may be marginal for crops or grazing.	8 to 11		
Land does not have water but supply is potentially available.	3 to 7		
Land does not have water supply is not potentially available.	0 to 2		
AGRICULTURAL SUITABILITY			
<u>Crops:</u>			
Highly suitable for irrigated crops.	6 to 10		
Highly suitable for irrigated crops or dry farming.	6 to 8	7 (39 ac irr/2 acs	6 (19 ac irr/24 acs
Low-Moderate suitability for irrigated crops or dry farming.	1 to 5	possible)	potential)
Unsuitable for crop production.	0		
<u>Grazing:</u>			
Highly suitable for pasture or range	6 to 10		
Moderately suitable for pasture or range.	3 to 5	5(18-22 AU/YR)	
Low suitability for pasture or range.	1 to 2	(controlled burn)	2(9-11 AU/YR)
Unsuitable for pasture or range.	0		
EXISTING AND HISTORICAL LAND USE			
In active agricultural production.	5	5	5
In maintained pasture/range.	5		
Unmaintained, but productive in last 10 years.	3 to 5		
Vacant land.	1 to 3		
Substantial development onsite.	0		
COMPREHENSIVE PLAN DESIGNATION			
A-II	5	5	5
ADJACENT LAND USES			
Surrounded by agricultural operations or open space in a region with adequate support uses agricultural support facilities.	9 to 10	10	10
AGRICULTURAL PRESERVE POTENTIAL			
Is in agricultural preserve.	5 to 7		
Can qualify as prime or non-prime preserve	1 to 7	7	6
COMBINED FARMING OPERATION			
Provides a small component of a combined farming operation.	1	1	1
No combined operation.	0		
TOTAL POINTS		72.2	66.6
60 or greater is considered a potentially significant agricultural resource			

Source: County of Santa Barbara Environmental Thresholds and Guidelines Manual, revised October 2002 with Replacement Pages July 2003.

cropland acreages are greater than the ranch for proposed lots 1, 2, 3, 4, 5, 6, 7, and 8. Respective points are 10 ER, 10, 10, 10, 10, 10, 10, 10, 5, 5, 6, 7, and 6.

Grazing is ancillary to the crop production viability on each of the proposed lots. The remaining grazing areas on the proposed lots are moderately suited for cattle grazing and receive the following respective points 8 ER, 5, 4, 3, 4, 4, 3, 4, 4, 3, 5, 6, 5, and 2.

Existing and Historical Uses

The ranch and the proposed lot areas are in active agricultural production so each will receive 5 points.

Comprehensive Plan Designation

The ranch is A-II and the proposed lots would continue to have that designation so each receive 5 points.

Adjacent Land Uses

The ranch and the proposed lots are bordered by agricultural operations in an agricultural area with support facilities, therefore, all receive 10 points.

Agricultural Preserve Potential

The ranch is currently under Land Conservation Act contract and the proposed lots should also qualify for contracts. Respective points are 7 for proposed lots #1, 2, 3, 4, 5, 7, 8, and 9 that have greater than 40 acres of prime land. Respective points are 6 for proposed lots #6, 9, 10, 11, and 13 since these lots have the possibility of 40 acres or more of prime land and/or are several hundred acres in size.

Combined Farming Operation

The cropland is leased at this time but could be combined in the future by a lessee operating on several of the individual proposed lots. One point is given for the ER and each proposed lot.

TOTAL POINTS

Existing Ranch = 81.6 points

Lot #1 = 76 points

Lot #2 = 76.5 points

Lot #3 = 74.8 points

Lot #4 = 76.7 points

Lot #5 = 76 points

Lot #6 = 73.7 points

Lot #7 = 76.1 points

Lot #8 = 75.2 points

Lot #9 = 67.5 points

Lot #10 = 69.2 points

Lot #11 = 70.5 points

Lot # 12 = 72.2 points

Lot #13 = 66.6 points

Conclusions

The agricultural viability of Rancho La Laguna and of the thirteen proposed lots are all above 60 points so no significant effect on agricultural resources should occur by the parcelization. Each of the proposed lots should be agriculturally viable because of the irrigated cropland productivity and revenues coupled with the ancillary livestock grazing on the rangeland areas.

Bibliography

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EXCERPT

Draft Mitigated Negative Declaration

Excerpted Sections

4.2 AGRICULTURAL RESOURCES

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Convert prime agricultural land to non-agricultural use, impair agricultural land productivity (whether prime or non-prime) or conflict with agricultural preserve programs?			X		
b. An effect upon any unique or other farmland of State or Local Importance?			X		

Setting:

Physical/Historic: The subject property is a 3,951-acre ranch located near the confluence of Foxen, Alisos, and Zaca canyons. The parcel is approximately seven miles north of Los Olivos, 18 miles southeast of Santa Maria, and seven miles northeast of Los Alamos. Approximately 563 acres of the ranch presently supports a combination of irrigated and dry farm crops some of which is leased to grow crops such as tomatillos, peppers, and squash during the warmer months of the year. Irrigated farmland and prime soils are located in the foothills on flat or gently sloping terrain. Existing fencing keeps cattle and horses outside the crop production areas and bulls in their pastures. The applicant grows oat hay for the cattle and horses during the colder months. Historically, the ranch has supported between 194 and 204 animal units per year (Sage Associates Agricultural Viability Study and Rangeland Assessment, September 2007). Cattle graze steeper portions of the property underlain with less productive soils. Two barns, a farm employee dwelling, cabin, and shop are currently used to support agricultural operations. The Existing Lot consists of the following soil types:

Table 1. Soil Types, Slope and % Cover for Rancho La Laguna				
Type	Slope	Capability Unit/Class	Acreage	Cover (%)
LmG Lopez shaly clay loam	15 to 75 percent	VII	1000.4	28.30%
ChF Chamise shaly loam	15 to 45 percent	VI	769.6	21.70%
EmC Elder loam	2 to 9 percent	II	443.1	12.50%
SmF Santa Lucia shaly clay loam	30 to 45 percent	VI	190.1	5.40%
ChG Chamise shaly loam	45 to 75 percent	VII	142.1	4.00%
GsF Gazos clay loam	30 to 45 percent	VI	134.2	3.80%
SpG Sedimentary rock land		VIII	125.8	3.60%
ArF3 Arnold sand	9 to 45 percent, severely eroded	VII	102.1	2.90%
SvC Sorrento loam	2 to 9 percent	II	97.6	2.80%

EnC2 Elder shaly loam	2 to 9 percent, eroded	II	58.8	1.70%
CkF Chamise clay loam	30 to 45 percent	VI	46.8	1.30%
SfE San Andreas-Tierra complex	15 to 30 percent	VI	40.3	1.10%
ChD Chamise shaly loam	9 to 15 percent	IV	39.8	1.10%
CuC Corralitos loamy sand	2 to 9 percent	III	39.2	1.10%
BoA Botella loam	0 to 2 percent	I	39	1.10%
SmG Santa Lucia shaly clay loam	45 to 75 percent	VII	36.7	1.00%
ArD Arnold sand	5 to 15 percent	IV	35.3	1.00%
CfD Chamise shaly sandy loam	9 to 15 percent	IV	26.8	0.80%
BoD2 Botella loam	2 to 15 percent, eroded	III	25.2	0.70%
SfD San Andreas-Tierra complex	5 to 15 percent	IV	20.2	0.60%
SfG San Andreas-Tierra complex	30 to 75 percent	VII	17.3	0.50%
TrE2 Tierra loam	15 to 30 percent, eroded	VI	17.1	0.50%
EdC2 Elder sandy loam	2 to 9 percent, eroded	II	15.5	0.40%
CuD Corralitos loamy sand	9 to 15 percent	IV	14.6	0.40%
LkG Lopez rocky loam	75 to 100 percent	VIII	14.4	0.40%
CwF Crow Hill loam	30 to 45 percent	VI	11.9	0.30%
BtC Botella clay loam	2 to 9 percent	II	11.4	0.30%
EmA Elder loam	0 to 2 percent	I	10.2	0.30%
EdD2 Elder sandy loam	9 to 15 percent, eroded	III	6.4	0.20%
ChG2 Chamise shaly loam	30 to 75 percent, eroded	VII	4.5	0.10%
GsG Gazos clay loam	45 to 75 percent	VII	3.2	0.10%

Regulatory:

Williamson Act: The property is subject to an Agriculture Preserve Contract (67-AP-003B) and the County's Uniform Rules for Agricultural Preserves.

County Thresholds Manual: Agricultural lands play a critical economic and environmental role in Santa Barbara County. Sustaining agricultural land not only provides a significant share of the County's economic activity, but also protects open space and maintains the rural lifestyle prevalent in this portion of the County. Because of the key economic role and public benefits provided by agricultural lands, the County has recognized the need to preserve these lands and discourage conflicting non-agricultural uses through the County Environmental Thresholds and Guidelines Manual (ET&GM), Land Use and Development Code (LUDC) as well as the Agricultural Element of the Comprehensive Plan. The ET&GM has adopted a point allocation system to provide a preliminary screening of a project's agricultural impacts during the Initial Study process. The weighted point system is used to assign relative values to particular characteristics of a site's agricultural productivity and suitability (e.g. soil type, water supply, etc.). The assignment of 60 or more points indicates an agriculturally viable parcel. The point system evaluates a site's agricultural suitability and productivity to determine whether the project may have a significant impact on agricultural resources. The existing parcel and proposed lots were all evaluated using the County's weighted point system.

The ET&GM also suggests that for grazing projects, detailed information of the number of animal units supportable on a particular parcel should be considered in the project's

environmental document. The Santa Barbara County Cattlemen's Association has indicated 25 to 30 animal units per year is the appropriate carrying capacity threshold. An animal unit or AU is equal to a 1,000-pound cow. The manual states *"As a general guideline, an agricultural parcel of land should be considered to be viable if it is of sufficient size and capability to support an agricultural enterprise independent of another parcel. To qualify as agriculturally viable, the area of land in question need only be of sufficient size and/or productive capability to be economically attractive to an agricultural lessee."* The estimated number of animal units for the Existing Lot and Proposed Lots were obtained from the Sage Associates Agricultural Viability Study and Rangeland Assessment dated September 2007 and supplemental letter dated September 28, 2009. Larger agricultural parcels may have a combination of cropland and grazing land and it is reasonable to credit the combined potential.

Important Farmland State Designation: According to the Department of Conservation (2006 GIS dataset), the subject property contains approximately 248 acres of Prime Farmland (6%), 7 acres of Farmland of Unique Importance (less than 1%), 230 acres of Farmland of Local Importance (6%) and 3,467 acres of Grazing Land (88%). The Department of Conservation has defined Prime Farmland to be "farmland with the best combination of physical and chemical features able to sustain long term agricultural production". Farmland of Unique Importance is "farmland of lesser quality soils used for the production of the state's leading agricultural crops". This land is usually irrigated, but may include non-irrigated orchards or vineyards. Farmland of Local Importance is "land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee". In Santa Barbara County this is all dryland farming areas and permanent pasture (if the soils are not eligible for either Prime or Statewide Importance) including various cereal grains (predominantly wheat, barley, and oats), Sudan grass, and many varieties of beans. Grazing Land is "land on which the existing vegetation is suited to the grazing of livestock." In Santa Barbara County, much of the grazing land has been converted to vineyard because the wine grapes produce a high quality wine on non-prime soils. The applicant's consultant has identified portions of the subject property that are not currently in crop production but that would likely be well suited for vineyard production (Mesa Vineyard Management, February 2, 2010).

Impact Discussion:

(a) The agricultural impact analysis for the proposed project consists of three parts: The Weighted Point System, Rangeland Assessment, and site specific factors that may affect agricultural productivity and suitability. Using the ET&GM, the County conducted an independent weighted point assignment for the project site to assess potential impacts on the agricultural productivity of the land from the proposed subdivision. The weighted point system evaluates the potential of the land from an agricultural crop production and grazing perspective. The applicant provided an Agricultural Viability Study and Rangeland Assessment report by Sage and Associates dated September 2007. The study is hereafter referred to as the "Sage Report". The Sage Report assessed agricultural viability by using the County's adopted weighted point system and estimated the rangeland carrying capacity for the existing and proposed lots. Soils, topography, canopy cover, condition of palatable forage, availability of livestock water, erosion, and fencing determined the average carrying capacity range for a moderate grazing level. Carrying capacity was estimated

with a low and high range of values. The low value included the rangeland areas and the high value included the rangeland and cultivated areas.

Weighted Point System Discussion

The Existing Lot receives 76 points, well above the 60 point threshold for agricultural viability. As such, each of the proposed lots is assessed using the point system to determine if the project would have a significant impact on their agricultural productivity and suitability. The total point score for each proposed lot follows:

Proposed Lot 1 receives 69 points
Proposed Lot 2 receives 68 points
Proposed Lot 3 receives 67 points
Proposed Lot 4 receives 75 points
Proposed Lot 5 receives 68 points
Proposed Lot 6 receives 70 points
Proposed Lot 7 receives 74 points

Proposed Lot 8 receives 67 points
Proposed Lot 9 receives 64 points
Proposed Lot 10 receives 67 points
Proposed Lot 11 receives 68 points
Proposed Lot 12 receives 68 points
Proposed Lot 13 receives 64 points

The point assignment calculation for each lot is in Table 2.

**Table 2. Rancho La Laguna Tentative Tract Map
Weighted Points Analysis Results**

[illegible]

Attachment 3
Mitigated Negative Declaration: Excerpted Sections
Agricultural & Biological Resources
Page 5

Agricultural Suitability		8	8	8	8	8	8	8	8	8	5	5	5	6	5
Crops															
Highly suitable for certain crops	8-10														
Highly suitable for certain crops	6-8														
Moderate	4-5														
Low suitability	1-3														
Unsuitable	0														
Grazing		8	5	4	3	4	4	4	4	3	3	5	6	5	2
Highly suitable	6-10														
Moderate	3-5														
Low	1-2														
Unsuitable	0														
Existing and Historic Land Use		5	5	5	5	5	5	5	5	5	5	5	5	5	5
Active Ag	5														
Unmaintained	3-5														
Vacant	1-3														
Urban/Other	0														
Comprehensive Plan Designation		5	5	5	5	5	5	5	5	5	5	5	5	5	5
A-II	5														
A-I	4														
Recreation/Open	3-4														
Ranchette 5-20	2														
Residential/Other	0														
Adjacent Land Uses		9	9	9	9	9	9	9	9	9	9	9	9	9	9
Surrounded by Ag. w/ support uses	9-10														
Surrounded by ag w/o support uses	7-8														
Partially ag.	3-6														
Urban	0-2														
Agricultural Preserve Potential		6	6	6	6	6	6	6	6	6	6	6	6	6	6
Qualify Prime	5-7														
Qualify Non-Prime	2-4														
Qualify Prime Jointly	3-4														
Qualify Non-Prime Jointly	1-3														
Cannot Qualify	0														
Combined Farming Operations		0	1	1	1	1	1	3	1	1	1	1	1	1	1
Significant Component	5														
Important Component	3														
Small Component	1														
None	0														
Total Score		76	69	68	67	75	68	70	74	67	64	67	68	68	64

Parcel Size

The following ranges are used to assess all the parcels:

Parcel size (acres)	Points Assigned
Less than 5	0-3
5-less than 10	4-6
10-less than 40	7-8
40-less than 100	9-10
100-less than 500	11-12
500-less than 1000	13-14
1000 or greater	15

The Existing Lot is 3,951 acres in area. Therefore, the maximum 15 points are applied. Proposed Lots 1 through Lot 8 are assigned 11 points each, Proposed Lots 9, 11, and 12 are assigned 12 points each, and Proposed Lots 10 and 13 are each assigned 13 points based on proposed area, respectively.

Soil Classification

The soil classification is analyzed for the existing and proposed Lots using the GIS soils data from Natural Resource Conservation Service Irrigation Capability Classification. According to the Environmental Thresholds and Guidelines Manual, "where a variety of soil types are present on a site, weight should depend upon extent of useable prime/non-prime acreage. As appropriate, points may be assigned according to approximate percentages of site area containing various soil classifications". Therefore points were assigned within the point range for the soil class majority. Higher points were assigned within the range if the soils are cultivated and/or usable. Soil Class points ranges are described in Table 3. A breakdown of the soils percentages and point score are shown in Table 4. Bold type indicates the soil class majority for each lot.

Table 3 – Soil Class, Description, Point Range and Averages

Irrigated Capability Soil Classification Types and Description	Point Range
Class I Few Limitations	14-15
Class II Moderate Limitations	11-13
Class III Severe Limitations	8-10
Class IV Very Severe Limitations	6-7
Class VI Severe Limitations	1-5
Class VII Very Severe Limitations	1-5
Class VIII Recreation/Habitat Only	0

Table 4 - Soil Classification Acreages and Point Assignment

	Existing Lot	Lot 1	Lot 2	Lot 3	Lot 4	Lot 5	Lot 6	Lot 7	Lot 8	Lot 9	Lot 10	Lot 11	Lot 12	Lot 13
acreage	3959.42	201.90	160.27	173.00	189.14	156.81	147.00	211.37	254.85	458.29	602.21	424.68	368.16	611.75
soil type														
ass	79.19a 2%	7.92a 4%	0a 0%	0a 0%	0a 0%	39.20a 25%	3.7a 2%	0a 0%	0a 0%	0a 0%	0a 0%	0a 0%	0a 0%	0a 0%
ass	633.51a 16%	64.85a 32%	58.64a 37%	65.06a 38%	90.79a 48%	9.41a 6%	48.74a 34%	90.48a 43%	73.91a 29%	0a 0%	12.04a 2%	38.22a 9%	51.54a 14%	18.35a 3%
ass III	197.97a 5%	27.81 13%	33.58 21%	9.46a 6%	15.13a 8%	9.41a 6%	8.37a 6%	25.85a 12%	5.10a 2%	15.59a 3.5%	18.07a 3%	0a 0%	0a 0%	36.71a 6%
ass IV	79.19a 2%	17.08 8%	0a 0%	0a 0%	0a 0%	0a 0%	0a 0%	26.30a 12%	0a 0%	37.8a 9%	0a 0%	0a 0%	14.73a 4%	0a 0%
ass VI	1306.61a 33%	72.30 37%	68.00a 42%	98.48a 57%	83.22a 44%	89.38a 57%	63.90a 43%	40.80a 19%	61.16a 24%	111.88a 24.5%	228.84a 38%	114.66a 27%	165.67a 45%	110.12a 18%
ass I	1504.57a 38%	11.93 6%	0a 0%	0a 0%	0a 0%	9.41a 6%	22.13a 15%	27.93a 14%	114.68a 45%	290.23a 63%	331.22a 55%	271.79a 64%	103.08a 28%	324.23a 53%
ass II	158.38a 4%	0a 0%	0a 0%	0a 0%	0a 0%	0a 0%	0a 0%	0a 0%	0a 0%	0a 0%	12.04 2%	0a 0%	33.13a 9%	122.35a 20%
point score	5	5	5	5	11	5	5	11	5	4	4	4	4	4

Water Availability

Water availability	Points assigned
Land has adequate water supply suitable for crops or grazing	12-15
Land has water but may be marginal in quantity or quality suitable for crops or grazing	8-11
Land does not have developed water supply but an adequate supply is potentially available	3-7
Land does not have developed water and potential sources are of poor quality or quantity	0-2

There are fourteen water wells on the Existing Lot and all are available for agricultural and domestic use. Currently, a series of water troughs and ponds provide adequate water for cattle. Although wells are located on Proposed Lots 1,2,3,4,5,6,8,12 and 14, the main source of agricultural irrigation water for the Existing Lot and proposed parcels is Well #13 and Well #14, located on Proposed Lots 12 and 4, respectively. Water sharing agreements are proposed for the proposed lots, giving all proposed lots equal access to one shared water system for domestic water supply (projected domestic demand for all lots combined is less than 50 GPM) and a separate shared water system for agricultural irrigation purposes. Well #14 will serve the needs of the domestic water system, which are minimal in comparison to the total production from this well. Well #13 and Well #14 will be the primary source of water for the shared agricultural water system. According to a Water Well Completion Report (July 6, 2006) provided by the applicant, Well #13 was tested at 1200 gallons per minute (GPM), the most that the test pump

could yield, and the supervising geologist recommended a long-term pumping rate of 1400 GPM. With the substitution of a larger pump, actual on-going production from this well exceeds 2,000 GPM. Well #14 was tested at 1,000 GPM, and intermittently at higher flow rates, with a maximum rate of 1,300 GPM. The supervising geologist recommended a long-term maximum flow rate of 1200 GPM with a possibility of higher yield with further testing. The lab concluded that the water from both wells is a good source for general irrigation suitability and a reliable source of water for domestic and agricultural demands. In addition, there are fifteen existing water storage tanks serving the agricultural operations on the property. Of these, eleven are 5,000 gallons in capacity and four are 3,000 gallons in capacity. The existing agriculture is drip irrigation and these tanks provide adequate gravity flow pressure for the irrigation system. The Existing Lot and Proposed Lots 4 and 12 were assigned the maximum 15 points because they contain the two highly productive wells. All of the remaining parcels were assigned 14 points. Although they do not contain the two highly productive wells, they will all have equal rights to an adequate water supply the proposed shared water agreement.

Agricultural Suitability

Crops	Points Assigned
Highly suitable for irrigated grain, truck and field, orchard, or vineyard crops	8-10
Highly suitable for irrigated ornamentals, pasture, alfalfa, or dry farming	6-8
Moderately suitable for irrigated crops, orchard, ornamental or dry farming	4-5
Low suitability for irrigated crops, orchard, ornamentals or dry farming	1-3
Unsuitable for crop production because of soil capabilities, environmental constraints, etc.	0

Grazing	Points Assigned
Highly suitable for pasture or range	6-10
Moderately suitable for pasture or range	3-5
Low suitability for pasture or range	1-2
Unsuitable for pasture or range	0

Agricultural Suitability for the existing and proposed lots were analyzed using data from the Department of Conservation's Important Farmland maps (2006), Agricultural Commissioner's GIS and pesticide use report data, and the Sage Report. Historical agricultural land use patterns, site specific characteristics, and a letter from Sage & Associates (September 28, 2009) were also considered. The Conservation Element states the major environmental determinants of agricultural suitability is water supply, soils, climate, terrain and environmental constraints. Environmental constraints may include biological resources, frost areas, flood areas, high groundwater tables, drainage problems, etc. Furthermore, the ET&GM indicates "assessment of

suitability should account for the approximate frequency and intensity of frosts and other climactic factors in applying points within the ranges. Parcels that are relatively frost free and may accommodate multiple crops may be considered more suitable than those which can support only a single crop or limited crop types due to climactic factors". The existing ranch and each of the proposed lots were assigned points for cattle and crops. The scores for each type of agriculture were added together for a total agricultural suitability score.

Existing Lot - Rancho La Laguna is a 3,951-acre parcel that currently supports irrigated crops, pastureland, and grazing land. The ranch contains approximately 563 acres of irrigated crops and pasture. High cash crops such as tomatillos, peppers, and squash are grown during the spring and summer months (May through November) on Prime soils with relatively flat terrain. This land is fenced to exclude cattle and is typically leased to growers. During the colder months (December through April), the same ground supports pastureland (oat hay) which is used to feed horses and cattle. Additional areas are also planted with oat hay in the winter. These lands are underlain with less than prime soils and designated as Farmland of Local Importance or Grazing Land. Approximately 3,934 acres (includes crop stubble that may be grazed) of Ranch La Laguna are grazed by 160 to 180 mother cow/calf pair, 20 replacement heifers, and 8 bulls. This equates to a historical carrying capacity of 194-204 animal units (AU) per year (Sage and Associates Rangeland Assessment, September 2007). Two barns, a farm employee dwelling, cabin, and shop are currently used to support the agricultural operation. Cattle graze within the fenced area along the foothills. This area is characterized by steeper terrain and less productive soils. An adequate water supply is available for the crops and cattle, and for wine grapes if vineyards are planted in the future.

The Existing Lot is considered highly suitable for irrigated grain, truck and field, orchard, or vineyard crops. The low end of the range, 8 points, was assigned to crop suitability because of the climate and location of the lot relative to agricultural support services. Consistent with the Sage Report, the Existing Lot was assigned 8 points for grazing suitability. A total of 16 combined points were assigned to the Existing Lot for the Agricultural Suitability category.

Proposed Lot 1 - Proposed Lot 1 is a 212 acre undeveloped lot with approximately 104 acres of irrigated rotational crops. The terrain of the cultivated areas is flat, underlain with Class I (Prime) soils. The parcel is designated as Prime Farmland (63 acres), Farmland of Unique Importance (5 acres), Farmland of Local Importance (1 acre), and Grazing land (143 acres). According to the ranch foreman, the ground is typically planted with oat hay during the winter months. Adequate water is available for the cattle and crop irrigation. The lot is considered highly suitable for irrigated grain or truck crops. The low end of the range, 8 points, was assigned for crop suitability to reflect the limitations on truck crops due to winter climate and remote location of the agricultural fields relative to agricultural support facilities and services. The non-cultivated portion of Proposed Lot 1 (approximately 143 acres) contains steeper slopes with non-prime soils, and is grazed by cattle. The Sage Report estimates Proposed Lot 1 average cattle carrying capacity to be approximately 11-19 AU/year. Based on these figures, Proposed Lot 1 is considered moderately suitable for pasture or rangeland and therefore 5 points were

assigned. A total of 13 combined points were assigned to Proposed Lot 1 for the Agricultural Suitability category.

Proposed Lot 2 - Proposed Lot 2 is a 183 acre undeveloped lot with approximately 62 acres of flat irrigated farmland underlain with Class II (Prime) soils and classified as Prime Farmland. According to the ranch foreman, the ground is typically planted with oat hay during the winter months. Adequate water is available for cattle and crop irrigation. The lot is considered highly suitable for irrigated grain or truck crops. The low end of the range, 8 points, was assigned for crop suitability to reflect the limitations on truck crops due to winter climate and remote location of the agricultural fields relative to agricultural support facilities and services. The non-cultivated portion of the lot (approximately 121 acres) contains steeper slopes, non-prime soils, and is grazed by cattle. The Sage Report estimates the average cattle carrying capacity to be approximately 10-16 AU/year. Based on these figures, the lot is considered moderately suitable for pasture or rangeland, therefore 4 points were assigned for grazing suitability. A total of 12 combined points were assigned to Proposed Lot 2 for the Agricultural Suitability category.

Proposed Lot 3 - Proposed Lot 3 is a 150 acre undeveloped lot with approximately 47 acres of irrigated farmland designated as Prime Farmland. The terrain for the cultivated areas is flat, mostly underlain with Class II (Prime) soils. According to the ranch foreman, the ground is typically planted with oat hay during the winter months. Adequate water is available for cattle and crops. The lot is considered highly suitable for irrigated grain or truck crops. The low end of the range, 8 points, was assigned for crop suitability to reflect the limitations on truck crops due to winter climate and remote location of the agricultural fields relative to agricultural support facilities and services. The non-cultivated portion of the lot (approximately 103 acres) contains steeper slopes, non-prime soils, and is grazed by cattle. The Sage Report estimates the average cattle carrying capacity to be approximately 7-11 AU/year. Based on these figures, the lot is considered moderately suitable for pasture or rangeland therefore 3 points were assigned for grazing suitability. A total of 11 combined points were assigned to Proposed Lot 3 for the Agricultural Suitability category.

Proposed Lot 4 - Proposed Lot 4 is a 192 acre undeveloped lot with approximately 76 acres of flat irrigated farmland designated as mostly Prime Farmland (2 acres are designated as Farmland of Local Importance) underlain with Class II (Prime) soils. According to the ranch foreman, the ground is typically planted with oat hay during the winter months. An adequate supply of water is available for cattle and crops. The lot is considered highly suitable for irrigated grain or truck crops. The low end of the range, 8 points, was assigned for crop suitability to reflect the limitations on truck crops due to winter climate and remote location of the agricultural fields relative to agricultural support facilities and services. The non-cultivated portion of the lot (approximately 112 acres) contains steeper slopes, non-prime soils, and is grazed by cattle. The Sage Report estimates the average cattle carrying capacity to be approximately 9-17 AU/year. Based on these figures, the lot is considered moderately suitable for pasture or rangeland therefore 4 points were assigned for grazing suitability. A total of 12 combined points were assigned to Proposed Lot 4 for the Agricultural Suitability category.

Proposed Lot 5 - Proposed Lot 5 is a 152 acre undeveloped lot with approximately 43 acres of irrigated farmland underlain with Class I (Prime) soils. The west end is currently planted with tomatillos and the eastern portion of the field is reserved for winter oat hay, according to the Ranch Foreman. Notwithstanding the presence of Prime soils, the State of California has mapped cultivated areas as designated as Farmland of Local Importance. This may be because part of the field is planted with oat hay. Adequate water is available for cattle and crops. The lot is considered highly suitable for irrigated grain or truck crops. The low end of the range, 8 points, was assigned for crop suitability to reflect the limitations on truck crops due to winter climate and remote location of the agricultural fields relative to agricultural support facilities and services. The non-cultivated portion of the lot (approximately 109 acres) contains steeper slopes, non-prime soils, and is grazed by cattle. The Sage Report estimates the average cattle carrying capacity to be approximately 11-15 AU/year. Based on these figures, the lot is considered moderately suitable for pasture or rangeland therefore 4 points were assigned for grazing suitability. A total of 12 combined points were assigned to Proposed Lot 5 for the Agricultural Suitability category.

Proposed Lot 6 - Proposed Lot 6 is a 143 acre lot with approximately 35 acres planted in oat hay during the winter. Existing structures include two barns, a shop and farm employee dwelling. These are located adjacent to the fields and are used to support the cattle grazing operation for the ranch. The proposed cultivated area is relatively flat, dotted with oak trees and underlain with Class I and II (Prime) soils. It is designated as Farmland of Local Importance most likely because it is planted in oat hay. Adequate water is available for cattle and crops. The lot is considered highly suitable for irrigated grain or truck crops. The low end of the range, 8 points, was assigned for crop suitability to reflect the limitations on truck crops due to winter climate and remote location of the agricultural fields relative to agricultural support facilities and services. The non-cultivated portion of the lot, approximately 108 acres) contains steeper slopes, non-prime soils, and is either developed or grazed by cattle. The Sage Report estimates the average cattle carrying capacity to be approximately 9-13 AU/year. Based on these figures, the lot is considered moderately suitable for pasture or rangeland therefore 4 points were assigned for grazing suitability. A total of 12 combined points were assigned to Proposed Lot 6 for the Agricultural Suitability category.

Proposed Lot 7 - Proposed lot 7 is a 213 acre lot with approximately 60 acres of irrigated Farmland designated as Farmland of Local Importance and underlain with Class II Prime soils. Adequate water is available for cattle and crops. The lot is considered highly suitable for irrigated grain or truck crops. The low end of the range, 8 points, was assigned for crop suitability to reflect the limitations on truck crops due to winter climate and remote location of the agricultural fields relative to agricultural support facilities and services. The non-cultivated portion of the lot contains steeper slopes, non-prime soils, and is grazed by cattle. The Sage report estimates the average cattle carrying capacity to be approximately 12-14 AU/year. Based on these figures, the lot is considered moderately suitable for pasture or rangeland and 4 points were assigned for grazing suitability. A total of 12 combined points were assigned to Proposed Lot 7 for the Agricultural Suitability category.

Proposed Lot 8 - Proposed Lot 8 is a 259 acre undeveloped lot with approximately 41 acres of irrigated farmland underlain with Class II Prime soils and designated as Farmland of Local Importance. Adequate water is available for cattle and crops. The lot is considered highly suitable for irrigated grain or truck crops. The low end of the range, 8 points, was assigned for crop suitability to reflect the limitations on truck crops due to winter climate and remote location of the agricultural fields relative to agricultural support facilities and services. The non-cultivated portion of the lot contains steeper slopes, non-prime soils, and is grazed by cattle. The Sage Report estimates the average cattle carrying capacity to be approximately 13-18 AU/year. Based on these figures, the lot is considered moderately suitable for pasture or rangeland and 3 points were assigned for grazing suitability. A total of 11 combined points were assigned to Proposed Lot 8 for the Agricultural Suitability category.

Proposed Lot 9 - Proposed Lot 9 is a 450 acre undeveloped lot designated as Grazing land. According to the NRCS soils data, the lot contains Class IV soils and steep terrain. The Sage Report estimates the capacity of the existing grazing areas to be 11-12 AU/year. According to aerial photographs, Agricultural Commissioner's Office GIS crop data and Important Farmland Maps (2000-2006), the lot has not been used to cultivate crops. The parcel was not planted during a site visit in August 2008. In early 2009, the applicant installed an irrigation system for crops and planted approximately 20.1 acres of tomatillos (Sage letter dated September 28, 2009). The amount of recent planting is significant in terms of the irrigation system and fencing but is very small compared to the overall size of the lot (4.6%) and the data does not show an established history of sustaining irrigated crops. The less productive soils, steep terrain and remote location of Lot 9 may limit the potential to sustain crop production. The lot is considered to have moderate suitability for irrigated crops and moderate suitability for grazing. Three points were assigned for crops and 5 points for grazing for total categorical score of 8 points.

Proposed Lot 10 - Proposed Lot 10 is a 595-acre undeveloped lot. Lot 10 is mostly designated as Grazing land. A small area, approximately 5 acres in size, is designated as Farmland of Local Importance. This designation indicates Lot 10 supported dry farm crops within the last few years. The area contains prime Class II soils and is contiguous with a larger agricultural field located on proposed Lot 7. According to Sage's September 28, 2009 letter, "the applicant cleared a 4.2 acre area adjacent to irrigated tomatillos and when irrigated would qualify as prime soil". An irrigation system was installed on an additional 7.2 acres and was planted with beans. The amount of newly planted crops is small relative to the lot size, approximately 2%. Despite the recent plantings, poor Class VI and VII soils and steeper terrain in the remaining portions of the lot potentially limits access to fields and increases erosion. These factors and the remote location of the lot relative to support services can reduce the potential to grow crops a variety of crops year round. The lot is considered to have moderate suitability for crops and 5 points were assigned. The Sage Report estimates the capacity of the existing grazing areas to be approximately 22 AU/year, considered Lot 10 to be moderately suitable for grazing. Therefore 5 points were assigned for grazing and 5 points were assigned for cropland for a total score of 10 points.

Proposed Lot 11 - Proposed Lot 11 is a 429 acre lot with approximately 20 acres of cultivated farmland located on Class II (Prime) soils. Important Farmland Maps designate the entire lot as Grazing land. Adequate water is available for the cattle and crop irrigation. The lot is

considered moderately suitable for irrigated crops because of the limited amount of cultivated acreage and assigned 5 points. The Sage Report estimates the capacity to be 30-32 AU/year and considered highly suitable for grazing land. Lot 11 received 6 points for grazing suitability. A total of 11 combined points were assigned to Proposed Lot 11 for the Agricultural Suitability category.

Proposed Lot 12 - Proposed Lot 12 is a 369 acre lot with approximately 30 acres of cropland designated as Farmland of Local Importance and underlain with Class II (Prime soils). Agricultural Commissioner's Office records indicate that the lot has supported tomatillos, peas, and pastureland (oat hay). Adequate water is available for the cattle and crop irrigation. The lot is considered highly suitable for irrigated crops. The low end of the range, 6 points, was assigned to reflect the limitations on crops during the winter months, the location of the parcel, and the remote location of the agricultural fields relative to agricultural support facilities and services. The remaining portion of the lot (approximately 339 acres) contains steep slopes and is grazed by cattle. The Sage Report estimated the grazing capacity as able to support 18-22 AU/year and considered it moderately suitable for pasture or rangeland. The lot is assigned 5 points for grazing suitability. A total of 11 combined points were assigned to Proposed Lot 12 for the Agricultural Suitability category.

Proposed Lot 13 - Proposed Lot 13 is a 605 acre lot with approximately 13 acres of cropland designated as Farmland of Local Importance and underlain with Class II (Prime soils). Adequate water is available for cattle and crops. It is unclear to what degree cattle use the lot because it is fenced off from the rest of the ranch. A cabin located on the lot is unoccupied most of the time. Most of the cropland is located on the southwestern portion of the lot adjacent to cultivated fields on Proposed Lot 12. The lot is considered moderately suitable for cropland because Zaca Creek and associated riparian area could limit farming potential by creating sensitive habitat and decrease ability for the lot to be farmed as one contiguous piece of land. Proposed Lot 13 was assigned 5 points for crop suitability. The non-cultivated portion of the lot contains steeper slopes and non-prime soils. The Sage Report assessed the grazing potential of Lot 13 as 601 acres and estimated the average cattle carrying capacity to be approximately 9-11 AU/year. Based on these figures, the lot is considered less suitable for pasture or rangeland and 2 points were assigned for grazing suitability. A total of 7 combined points were assigned to Proposed Lot 13 for the Agricultural Suitability category.

Existing and Historic Land Use

Description of Land Use	Points Assigned
In active agricultural production	5
In maintained range/pasture	5
Unmaintained, but productive within the last ten years	3-5
Vacant land – fallow or never planted	1-3
Substantial urban or industrial ag. development onsite	0

The Existing Lot and Proposed Lots are currently maintained as rangeland or contain cultivated agricultural crops. Therefore the maximum 5 points is assigned to each lot.

Comprehensive Plan Designation

Comprehensive Plan Designation	Points Assigned
A-II	5
A-I	4
Existing or proposed open space or recreation; open land; Rural Residential 40-100 acres	3-4
Residential Ranchette 5-20 acres	2
Residential 5 acres or less; Commercial, Industrial, Community Facility	0

The land use designation of the Existing Lot is A-II. The project does not propose to change the land use designation. Therefore, the maximum 5 points is assigned to each lot.

Adjacent Existing Land Use

Adjacent Land Uses	Points Assigned
Surrounded by ag /open space in a region with adequate support uses	9-10
Surrounded by ag operations or open spaces in a region without adequate agricultural support uses; Partially surrounded by ag or open space with some urban uses adjacent, in a region with adequate ag support uses	7-8
Partially surrounded by ag or open space with some urban uses adjacent in a region without adequate agricultural support uses	3-6
Immediately surrounded by urban uses with no buffers	0-2

The project site is near the intersection of Foxen Canyon Road and Los Alisos Canyon Road. Cattle grazing and rotational crops are common in this region and agricultural support services exist. However, the property is located approximately 40 minutes from Santa Maria, the closest major center for accessing agricultural support services such as coolers, labor, produce trucks, agricultural supplies, etc. Access to resources could increase fuel costs and potentially limit the type of crop grown on the property. Access to support services is less of an issue with the cattle grazing operation and the oat crop because of the nature of the commodity and the property already contains much of the infrastructure needed for the cattle grazing operation. Adjacent parcels and those in the vicinity are designated A-II with a minimum parcel size of 100 acres.

With the exception of two parcels to the north (APN 133-080-004 and 133-080-005), adjacent properties are enrolled in the Agricultural Preserve program. To the north and east is grazing land. To the south is grazing land with the exception of a 7 acre vineyard. Foxen Canyon Road borders most of the project site to the south. To the east are irrigated rotational crop fields (120 acres) and grazing land. Each lot is assigned 9 points, one less than the maximum to reflect the location of the parcel relative to support services.

Agricultural Preserve Potential

Agricultural Preserve Potential	Points Applied
Can qualify for prime ag preserve by itself or is in a preserve	5-7
Can qualify for non-prime ag preserve by itself	2-4
Can qualify for prime ag preserve with adjacent parcels	3-4
Can qualify for non-prime ag preserve with adjacent parcels	1-3
Cannot qualify	0

The Existing Parcel is currently enrolled in the Agricultural Preserve program (67-AP-003B); however, the contract is in non-renewal. Therefore, 6 points is assigned. The applicant proposes new contracts for each of the proposed lots. The proposed lots were reviewed on October 3, 2008 by the Agricultural Preserve Advisory Committee and found to be consistent with the Uniform Rules. All proposed lots are therefore eligible for agricultural preserve contracts and the applicant has agreed to apply for the replacement contracts prior to recordation of the proposed subdivision map. Therefore, the proposed lots are also assigned 6 points.

Combined Farming Operation

Combined Farming	Points Applied
Provide a significant component of a combined farming operation	5
Provide a important component of a combined farming operation	3
Provide a small component of a combined farming operation	1
No combined farming operation	0

According to the ET&GM, a combined farming operation refers to more than one separate parcel managed as a single agricultural operation. Currently, the cultivated portions of Rancho La Laguna are leased to at least one grower (Agricultural Commissioner's Office 2008 pesticide use records) and the rangeland/pastureland is managed by Rancho La Laguna LLC. Perimeter fencing surrounds most of the Existing Lot. Therefore, the Existing Lot does not appear to be

part of a combined farming operation and receives 0 points. All of the proposed lots, with the exception of Proposed Lot 6, are assigned 1 point because they are a small component of a combined farming operation. Proposed Lot 6 contains all the infrastructure for the cattle grazing operation at Rancho La Laguna. Therefore it is considered an important component of a combined farming operation and is assigned 3 points.

Results from the Weighted Point System, Sage Report and Rincon Report

Based on the County's independent analysis using the Weighted Point system, the existing parcel receives 77 points. All other proposed lots receive over 60 points. Based on the County's interpretation of the adopted 60 point threshold, the proposed subdivision would result in the creation of lots, each of which would be capable of supporting an independent viable agricultural operation.

The Sage Report also assessed agricultural viability using the Weighted Point system and concluded that the existing and proposed lots all score well above the 60 point threshold. Point assignments in the agricultural suitability category are the main difference between the two agricultural viability assessments and conclusions. The Sage Report estimates the carrying capacity of the rangeland for the Existing Lot to be 172-227 AU/yr. This is well above well above the Cattlemen's Association suggested threshold of 25-30 AU/yr. With the exception of Proposed Lot 11, the rangeland carrying capacity for each of the proposed lots is estimated to be below the threshold of 25-30 AU/yr. Estimated carrying capacity for each of the proposed lots are as follows: 11-19 AU/yr for Proposed Lot 1; 10-16 AU/yr for Proposed Lot 2; 7-11 AU/yr for Proposed Lot 3; 9-17 AU/yr for Proposed Lot 4; 11-15 AU/yr for Proposed Lot 5; 9-13 AU/yr for Proposed Lot 6; 12-19 AU/yr for Proposed Lot 7; 13-18 AU/yr for Proposed Lot 8; 11-12 AU/yr for Proposed Lot 9; 22 AU/yr for Proposed Lot 10; 30-32 AU/yr for Proposed Lot 11; 18-22 AU/yr for Proposed Lot 12, and 9-11 AU/yr for Proposed Lot 13.

The applicant submitted a study dated February 26, 2010, from Larry Lahr, an agricultural real estate specialist with Rincon Corporation. Mr. Lahr described the economic issues facing Rancho La Laguna and other large ranches with a combination crop/cattle operation. He argues the requirements to operate such varied commodities on a large parcel makes management difficult, deters potential buyers, constrains capital improvements, and can be a liability when securing a loan. Mr. Lahr concludes the proposed project would create more efficient economic units of land, thereby enhancing the long term agricultural viability of the property. He also concluded Lots 9 through 13 could support sufficient areas of prime production of row crops, orchard or vineyards.

Determination

Rancho La Laguna is a complex property with a mixture of physical features and agricultural history that make it unique. The site contains 31 different soil types, 7 different soil classifications, flat terrain, steep slopes and micro-climates. The ranch also supports three diverse types of agriculture: cattle grazing, dry farm crops and irrigated rotational crops. Many of the lots support rotational crops during the warmer months and dry farm crops and/or cattle

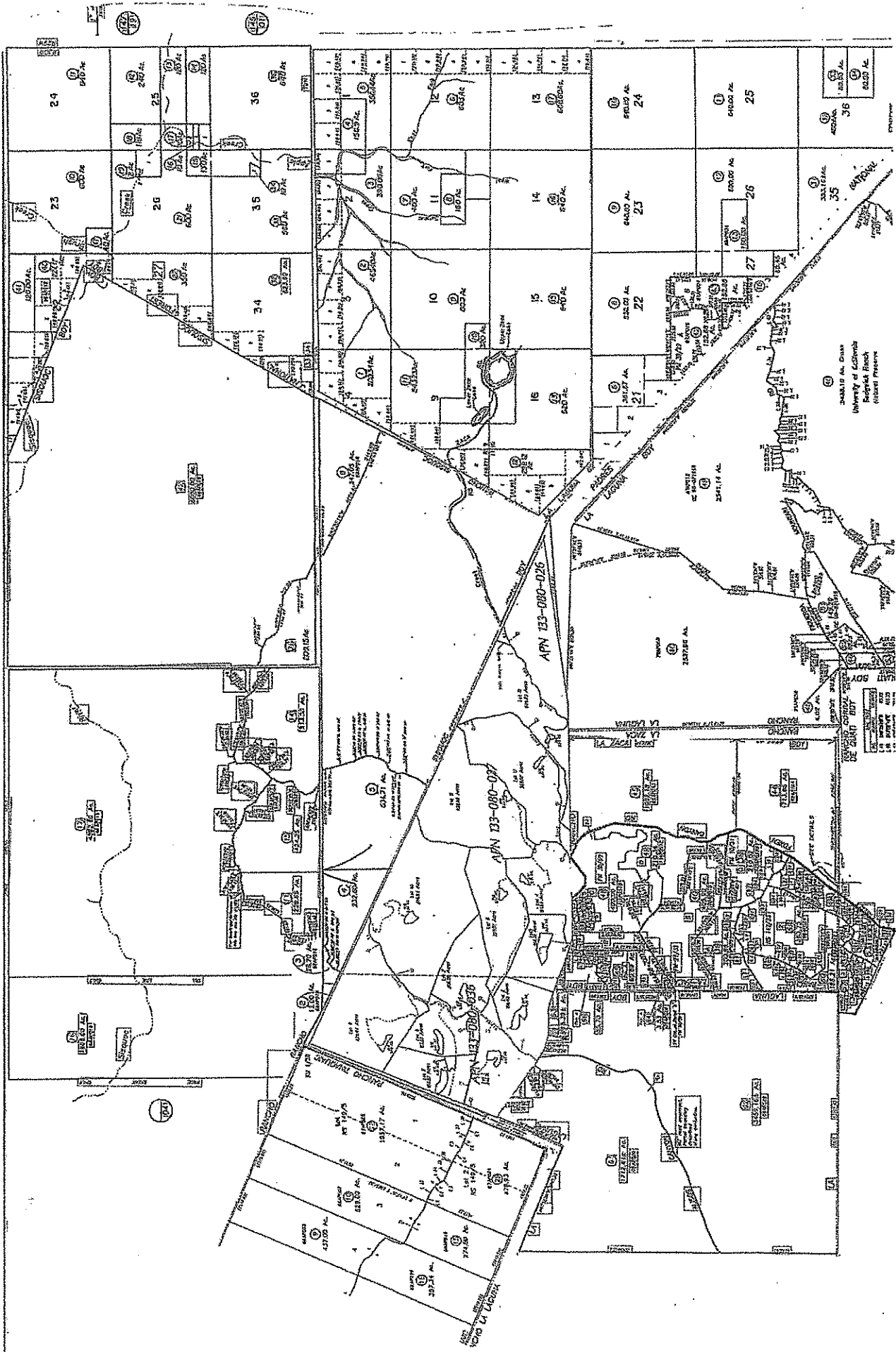
during the colder months. The Sage Report concluded all the proposed lots are agriculturally viable and estimated the cattle carrying capacity for most of the lots to be below 25-30 AU/yr. The County conducted an independent analysis using the weighted point system and determined the lots were at or above the 60 point threshold.

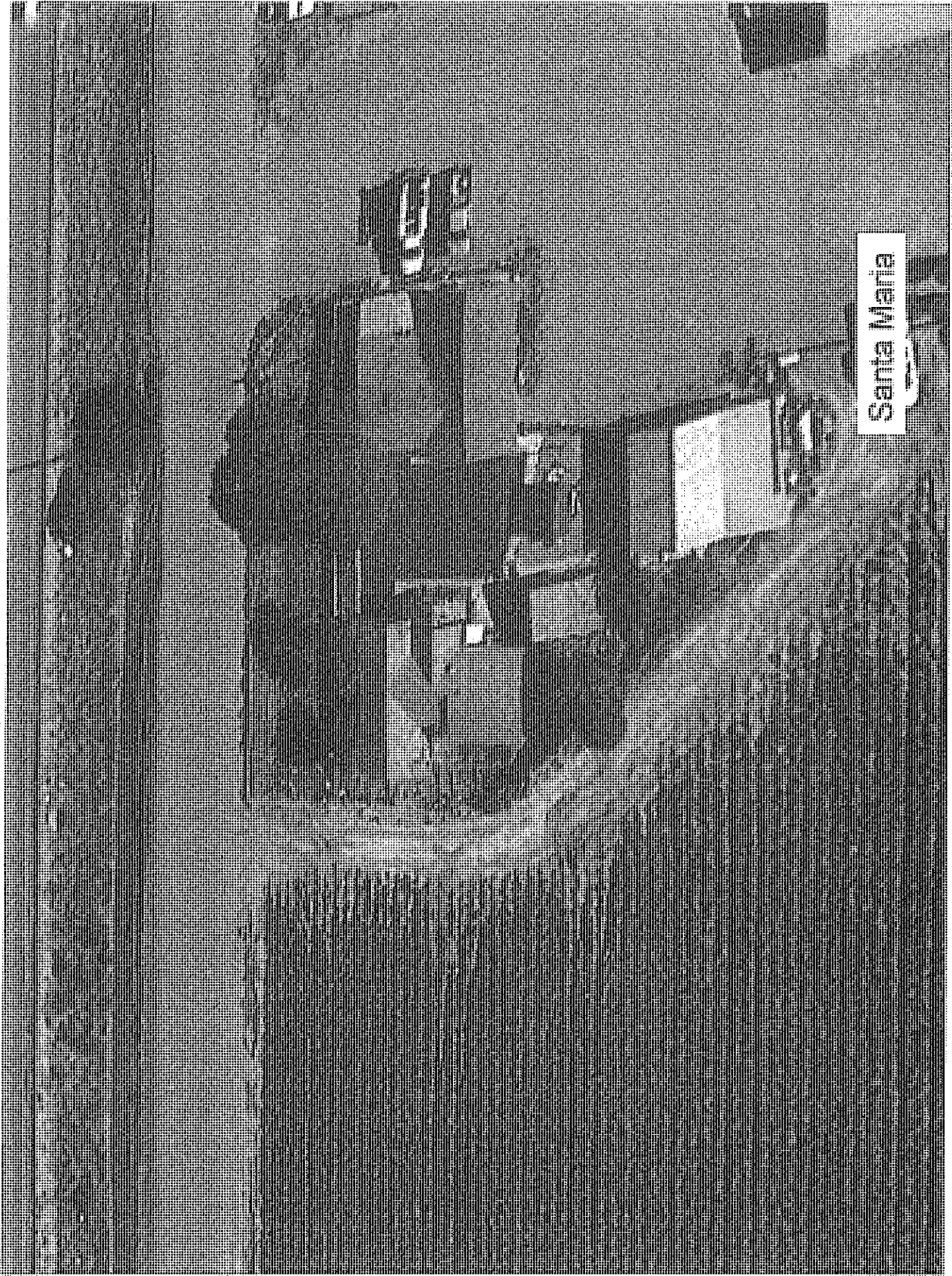
Analysis concludes the proposed lots are agriculturally viable as stand-alone operations. The results from the County's application of the weighted point system indicate the lots will not be affected by the land division. Cattle carrying capacity estimates are relatively low for each lot despite the large parcel sizes. However, this is not seen as a deficit but is an indication of the reduced parcel size (relative to the existing ranch) and demonstrates the lots will likely depend on irrigated crops as the main agricultural commodity. All of the proposed lots are considered viable based on their size and potential to be used for both crop production and grazing land. In addition, Lot 9 is increasing the amount of irrigated cropland. This is demonstrated by recent plantings of irrigated crops (beans) and installation of additional irrigation lines. It is reasonable to assume the parcel will be viable if assessed as both cropland and grazing land, or if additional irrigated crop areas, such as vineyards, are planted in the future. The majority of the undeveloped portion of the lot would be used for cattle. Therefore, the irrigated cropland and cattle grazing would overall constitute a viable agricultural operation. The Rincon Study states combined agricultural operations are more likely to be economic feasible on a lot smaller than the existing lot. Large portions of grazing land in the County have been planted with vineyards, a crop that does not require productive soils or flat terrain. Based on the conclusion from the County's independent analysis and information obtained from the Sage Report, Rincon Report and subsequent letters from the applicant, impacts to agricultural resources would be but less than significant.

(b) The Existing Lot contains approximately 7 acres of Farmland of Unique Importance (less than one-tenth of 1% of total area) and 230 acres of Farmland of Local Importance (6% of total area). Most of this farmland is located on Proposed Lots 5,6,7, and 8 which all obtained scores above the 60 points threshold for agricultural viability. Risk of conversion of these farmlands to non-agricultural uses is minimal because the applicant placed building envelopes and driveways outside farmland designated as Farmland of Unique or Local Importance. Due to the small amount of these designated farmlands and limited risk of conversion, impacts to unique or locally important farmlands would be adverse but less than significant.

Cumulative Impacts: Since 1990, there have been no recorded subdivisions within a one-mile radius of the subject property. There are a number of properties in the area that could theoretically subdivide, but those would be separate discretionary applications subject to separate environmental review. Due to the absence of subdivisions in the recent past and nearby national forest lands that would not allow subdivision or additional development, the proposed subdivision is not considered cumulatively considerable and the cumulative impacts to agricultural resources would be adverse but less than significant.

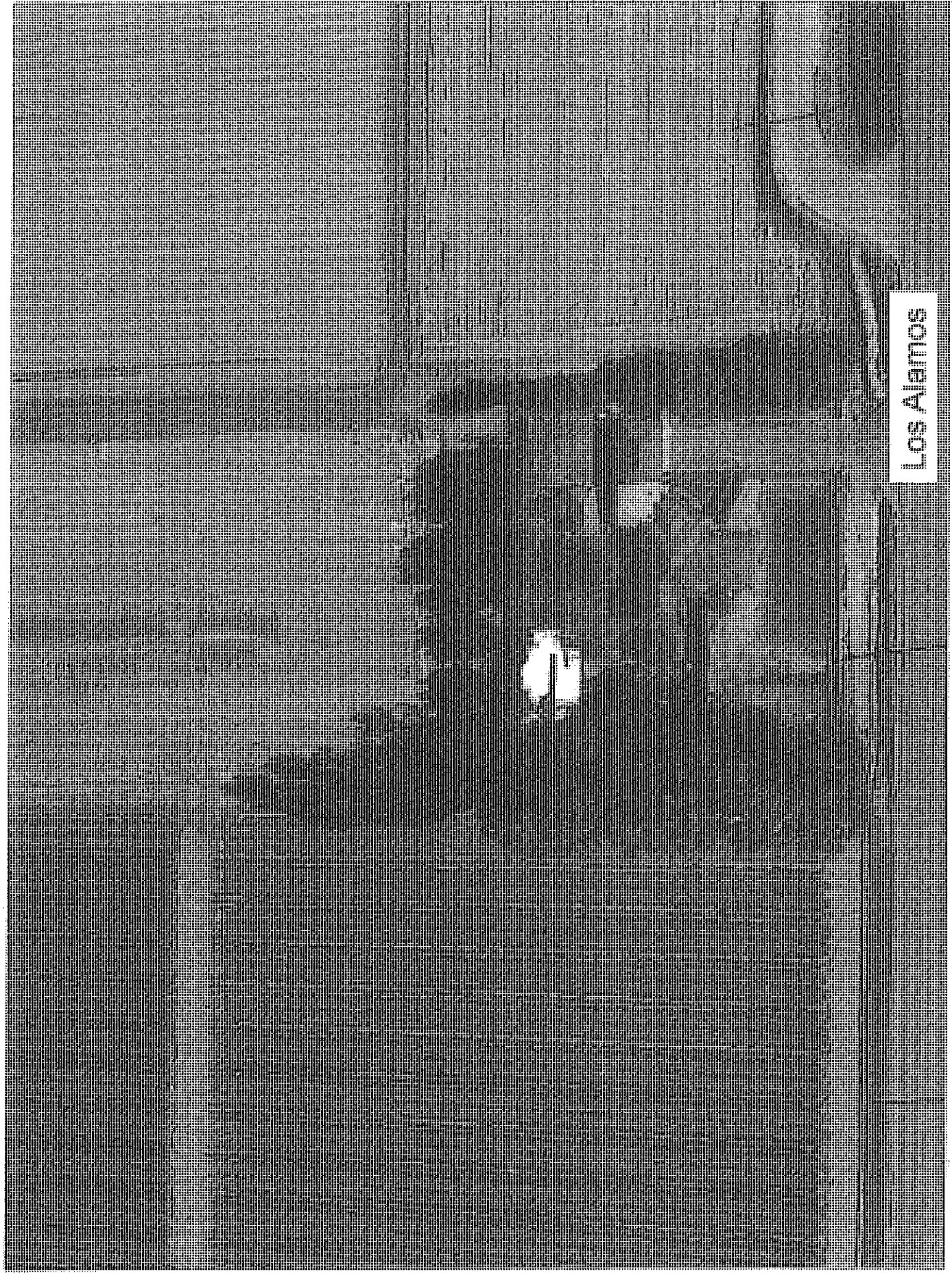
Mitigation and Residual Impact: Impacts to agricultural resources would be less than significant. No mitigation measures have been identified. Therefore, residual impacts would remain less than significant.





Santa Maria

Los Alamos



Santa Maria



East Santa Maria



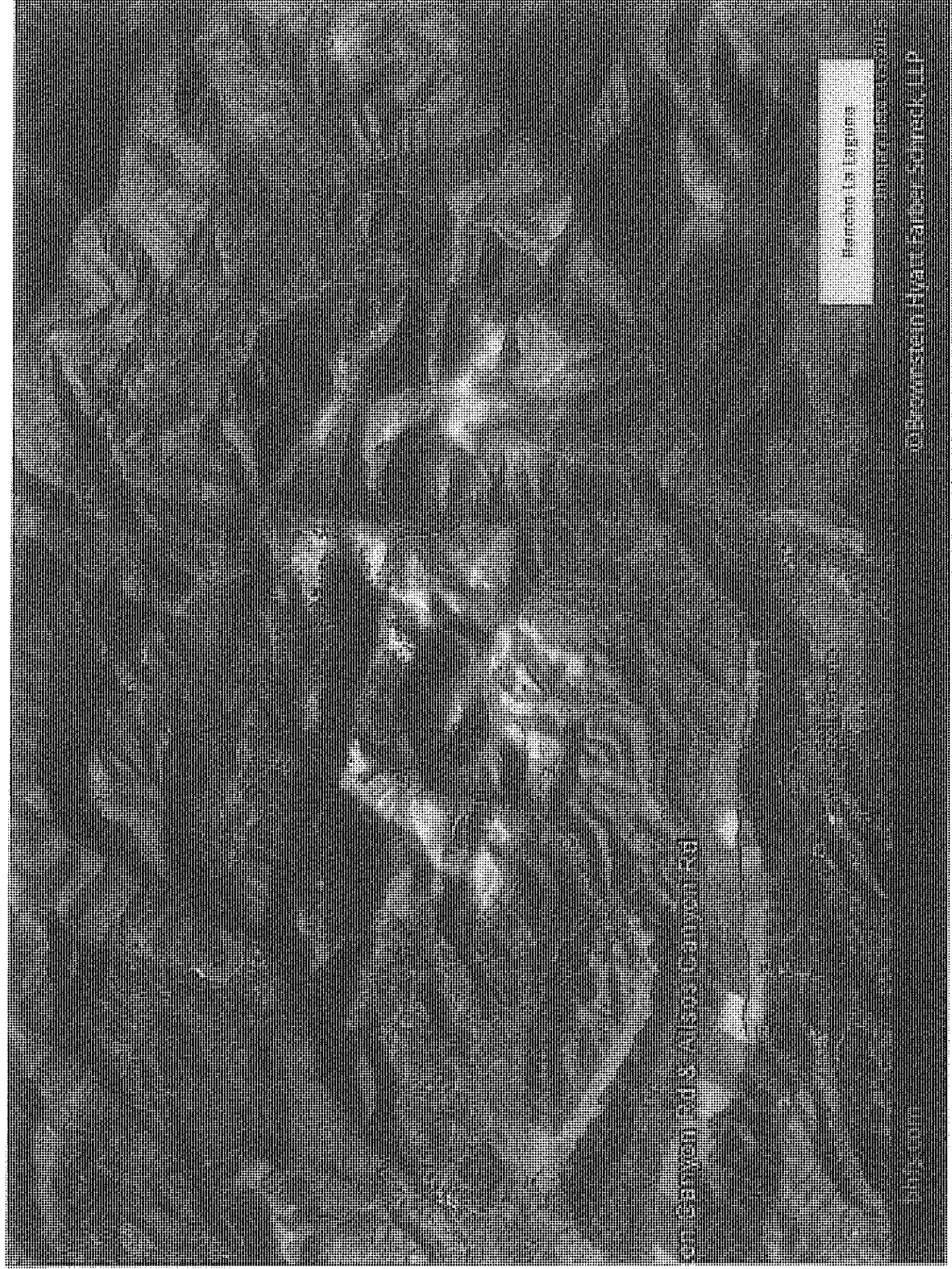
Los Alamos

1300 CA-115

1300 CA-115



Guadalupe



on Canyon Rd & Aliso Canyon Rd

Mancha la Laguna

10/10/10 10:10 AM

10/10/10

10/10/10 10:10 AM

South of Ranch





February 28, 2010

Ms. Tish Beltranena, Principal Planner
MNS Engineering, Inc.
201 Industrial Way
Buellton, CA 93427

Re: Rancho La Laguna (the Property)

Dear Tish:

Pursuant to your request, I have performed a review of the Property for the purpose of understanding the viability of continued or intensified agricultural operations for the thirteen parcels (the Proposed Parcels) resulting from the proposed subdivision of the Property (the Subdivision). Part of my review included the prospect of future intensification of the agricultural operations in order to overcome non-agricultural economic pressures, and to promote the agricultural economic viability of the Property well into the future.

DESCRIPTION OF RELEVANT INFORMATION UTILIZED

Summary of My Experience

In performing this review, I rely upon my professional experience of over thirty years involving agricultural real estate. I graduated from Cal Poly, San Luis Obispo in 1978 with a degree in Agricultural Business. I was employed by Production Credit Association, a part of the Farm Credit System, in the Santa Ynez Valley for approximately eight years, where my job duties included real estate appraisal of agricultural properties, originating loans, and servicing loans for agricultural operations. I am a licensed real estate broker and owner of Rincon Corporation, which I founded in 1991. Rincon specializes in providing real estate services for agricultural properties, including brokerage, leasing, appraisal and management. In addition to my professional experience, I have owned ranches and cattle operations in California and Arizona.

Throughout my career, I have analyzed the viability of agricultural operations ranging from ten acres to over ten thousand acres in size and am familiar with the economic factors that determine whether an agricultural enterprise will be economically viable.

I am very familiar with agricultural operations and production in Santa Barbara County and I am familiar with Rancho La Laguna and surrounding agricultural properties.

Summary of Documents Reviewed

For the purpose of this analysis, I have reviewed the following information:

- Agricultural Viability Study by Sage Associates dated September 2007, and update thereto dated 9/28/09 (Sage Report).
- Vineyard development potential analysis done by Mesa Vineyard Management.
- Proposed Tentative Parcel Map.
- Various engineering materials and aerial photographs provided by MNS Engineering including the proposed TPM, topo maps, current use maps, proposed access map.
- NRCS Soil map.
- Google Earth virtual images.

DESCRIPTION OF THE PROPERTY

Rancho La Laguna (Property) consists of approximately 3,900 acres situated adjacent to and north of Foxen Canyon Road. The Property is located about 7.5 miles north of the town of Los Olivos and about 7.5 miles northeast of the town of Los Alamos. The Ranch entrance is at the intersection of Foxen Canyon Road and Alisos Canyon Road. The Property is currently utilized for cattle grazing, irrigated row crop farming, and dry farming. Topography for the Property is quite varied, ranging from flat and level, which is currently in irrigated farming operations, to steep, which is currently used for cattle grazing.

There are numerous water wells located on the Property, which according to the Sage Report are adequate to support existing and proposed irrigated farming, and additional future vineyard development, as well as providing water for livestock and domestic purposes. Structures currently on the Property include barns, corrals, and a manager's residence which I did not consider to be economically significant to my analysis.

The existing road system consists primarily of dirt "ranch roads" which currently provide access to each Proposed Parcel. The type of access necessary for vehicular access, for agricultural purposes, to each of the Proposed Parcels varies depending upon the type of production occurring on that Parcel. For cattle grazing, vehicular access (which can be supplanted by ATV) is necessary to visually check water, salt and feed for the cattle, to inspect and repair fencing, and to monitor the health of the cattle. For more intensified farming operations, such as row crops or vineyards, access must be adequate to move farming equipment and personnel into and out of existing or potentially intensified agricultural operations. Access generally must include all-weather access for production farming such as row crops, orchards and vineyards. Crops often are rotated as part of an integrated pest and disease management program. Orchards and vineyards generally require wet-weather access for pruning and/or frost protection.

DESCRIPTION OF THE PROPOSED SUBDIVISION

The Proposed Subdivision of the Property would result in thirteen (13) Proposed Parcels in lieu of one existing parcel. These Proposed Parcels would vary in size from 160 +/- acres to 605 +/- acres. Each Proposed Parcel includes a proposed designated residential home site location (RDE) that would not hinder agricultural operations. Proposed Parcels number 1 through 8 are the smaller of the Parcels, located closest to Foxen Canyon Road, and contain most of the prime farm land. Proposed Parcels number 9 through 13 are the larger parcels and are located on the northern part of the Property where the topography is steeper with less prime farm land and more slopes. See Exhibit C for a Proposed Tentative Parcel Map.

ANALYSIS OF THE PROPERTY'S ECONOMIC COMPONENTS

The Property Comprises Several Different Economic Components

Grazing land is the least productive agricultural land in the County of Santa Barbara. Most grazing operations are subsidized by other uses, whether royalties or leasehold income from energy projects, intensified farming on the better farm land, vineyard leasing, or the owner's personal wealth. If those subsidies decline or cease, or if estate taxes come into play, these larger land holdings are subjected to development pressures, or alternatively, to capital demands in order to intensify the agricultural production to maintain or increase the income generated by agriculture. On some portions of these land holdings, slopes or poor quality soil may limit productivity to livestock grazing while the remainder of the land is dedicated to more lucrative agricultural pursuits. As the agricultural production intensifies on larger agricultural parcels over time, the individual agricultural economic components of that Parcel eventually evolve to their highest and best use. When a large agricultural parcel is fairly homogeneous in its Ag Production Criteria (topography, parcel shape, access, soil type, climate, micro-climate, water availability, drainage, etc.), the entire parcel can be intensified as one economic unit, which is common in the San Joaquin Valley. However, when a larger agricultural land holding substantially varies in its Ag Production Criteria, such as is the case with the Property, the optimum economic components of the property will form a number of units that cluster around the Ag Production Criteria relative to the highest and best use, provided by that group of criteria. These I refer to as Economic Components.

The Property varies substantially as to the Ag Production Criteria. The groupings of these criteria provide for the following types of Economic Components for the Property as they relate to types of agricultural production, listed in order of highest and best economic use:

1. Irrigated row crop land
2. Vineyard development land
3. Dry farm land
4. Irrigated pasture
5. Native cattle pasture

The Problems With Mixed Economic Components Within A Large Parcel

In Santa Barbara County, many of the larger agricultural properties outside of the Santa Maria Valley and the Lompoc Valley have a mix of Economic Components within each individual property. The larger the parcel, the higher the probability of this mix occurring and the greater the magnitude of its economic impact. With smaller ranches, a farmer is more likely to provide the fencing necessary to lease the non-prime land to a cattle operator, who either will stock the land with year-round cow/calf units or stockers (seasonal grazing). The rainfall in Santa Barbara County, and resulting carrying capacity of the land, is such that few landholdings provide sufficient year-round forage so many cattle operators enter into leases for grazing land with landowners who are not cattle operators. This is necessary in order to accumulate a critical mass of grazing land to support a commercial cattle operation. Some cattle operators even move their cattle from state to state for the same reason. The lease income to the landowner is modest (usually at an economic return well under one percent of the market value of the land) however it supplements the farming income while providing fire management on the non-prime land.

Mixed Economic Components within a parcel have adverse impacts on the following:

- Management - Of the five Economic Components of the Property listed above, only irrigated pastures and native cattle pasture are uses that are typically operated by the same management. The other uses -- irrigated row crop, vineyard development (and operations) and dry land farming -- are typically mutually exclusive as to the management

skills necessary for the successful operation of each. Not only are the production skills mutually exclusive but the markets and marketing for the products are completely different from each other and the equipment into which the operator must invest varies widely. A cattle operator doesn't need expensive planting and harvesting equipment and a row cropper or vineyard operator doesn't need livestock truck/trailers, horses and trained dogs, portable chutes, squeeze chutes, and the like.

- Capitalization for ag intensification – Future intensification of the agricultural operations will be necessary to respond to changing market demands as well as to counter economic pressures from non-agricultural forces. The ability to capitalize future improvements to facilitate ag intensification is dependent upon the economic return to the capital, be it debt or equity. Of the five economic components of the Property, vineyard development is the most capital intensive, with the non-land cost of vineyard development in the \$25K to \$30K per acre range. These costs include grading, soil amendments, trellising, planting, irrigation systems, frost protection, reservoirs, and cultivation for the first few years of non-production. Orchards are the next most capital intensive, with the combination of initial capital for acquiring and planting the trees and the longer-term investment in tending the trees until they are of sufficient bearing capacity to bring a return on the investment. Irrigated row crops follow closely behind, with capital improvements that might include grading and leveling, soil amendments, irrigation systems, tiling, drainage and retention.

When a property has a mix of Economic Components within it, the ability of the owner to obtain the capital required to intensify the agricultural operations is severely restrained. This is because a capital source, whether equity or debt, will only be interested in capitalizing one of the uses. The capital source must have comfort (i.e. knowledge and experience) with the particular agricultural operation's (and operator's) ability to generate a reasonable return on that capital.

- Marketability - In my experience as a real estate broker for ag properties in Santa Barbara County, I have encountered many examples of mixed Economic Components within ag parcels and have observed the negative market reaction to the mixed components. I often refer to this as the "apples and oranges syndrome". When a buyer comes into a market looking for a particular type of property, they seldom have the interest, the management ability, and the capital sources for more than one Economic Component. That buyer may be wanting to buy "apples" but with mixed Economic Components, he is forced to buy "oranges" as well, even if he doesn't have a use or desire for oranges.

Looking at the five Economic Components of the Property, they really need to be divided into two major categories. The irrigated row crop ground and the vineyard or orchard development ground are generally acquired by someone in the commercial business of growing irrigated crops, orchards or vineyards, and are purchased with an economic return in mind. Dry farming, irrigated pastures, and native pastures have very low income return relative to their market value. Therefore, the buyer of these properties is generally looking to buy a property for the lifestyle it provides. When this is the case, such non-economic factors as aesthetics, views, privacy, etc. become more critical in determining market value than do the income of the Economic Components.

A good example of how the resistance to mixed Economic Components operates arose in the sale several years ago of a large cattle ranch in the Los Alamos area. The buyer was a major commercial vineyard developer/operator. The ranch consisted of nearly 5,500 acres, of which approximately 1,000 acres were deemed plantable for vineyard. The market value of plantable vineyard ground at the time was \$10,000 per acre. This ranch sold for \$10 million which represented full value of the vineyard plantable acreage and zero value for the remaining 4,500 acres of pasture land.

Had that ranch been purchased by someone seeking a large cattle ranch, which would have been for lifestyle purposes due to the low income as a cattle ranch, the market price likely would have been \$5 million to \$6 million. The cattle ranch buyer would not have had the management ability to develop and operate 1,000 acres of vineyard, nor been able to attract the necessary capital to do so (\$20 million +/- at the time), and therefore would not fully value the developable vineyard ground.

- Financing - Financing for ag property, or the ability to attract debt capital that is secured by the property, is necessary for:
 - Acquisition of the property
 - Capitalization of ag intensification (see above)
 - Financing working capital for the ag operation
 - Paying estate taxes
 - Marketability of the property

Lenders on agricultural properties are primarily banks, insurance companies, and Farm Credit. A lender is required to use various underwriting criteria when evaluating a loan request, the most significant which are the borrower's credit, the loan-to-value ratio, and the income producing capacity of the land.

When a lender makes a loan for a particular ag parcel, it will often ignore the value Economic Components that are outside the purpose of the loan. For example, if a land owner comes to a lender for a loan of \$3 million to develop 100 acres of vineyard on a parcel of 1,000 acres, the balance which is native pasture, the lender typically will consider only the appraised value of the finished vineyard and will ignore the value of the other 900 acres of land. This is because, in the event the lender ends up foreclosing and having to resell the property, the new buyer will not fully value, or will not value at all, the other 900 acres of land (see Marketability above).

Furthermore, a lender typically will consider only the income of the Economic Component of the property when underwriting the income producing capacity of the land. Either the omitted appraised value or the omitted income from non-Economic Components can be the constraint that prevents optimal or even feasible financing. In short, the "extra" land can operate as a detriment to underwriting because it can generate an unwanted expense and risk. Unused grazing land can pose a fire hazard, but the low income potential of grazing land may not offset the cost of fencing necessary to contain the livestock.

Another component to consider is that of the landowner's desire to avoid the risk involved in encumbering the entire ranch to raise capital needed for only a portion of the ranch. Given the choice, a landowner would prefer to encumber only the portion of the property dedicated to the use for which the financing is sought (e.g., the plantable vineyard area), preserving the remainder of the landholding in the event of foreclosure of the loan. Under the Subdivision Map Act, it is not legal to finance a portion of an undivided parcel. No knowledgeable lender would agree to collateralize a loan with an undivided portion of a parcel, or with a tenant-in-common undivided interest in a larger parcel.

- Estate Taxes - Unfortunately, it appears that estate taxes will again be back in the mix for owners of ag properties. The estate tax historically has been the bane of family owned agricultural operations and properties, forcing the sale of many ranches despite the best intentions of the families to continue in agriculture. This occurs because the large asset size of a property necessary for commercially viable agriculture triggers substantial amounts of estate tax with the passing of a generation. Typically, family ag operations

are "land rich and cash poor" and need some kind of liquidity event in order to pay the estate tax. This liquidity event may be financing with debt capital or it may require the sale of the asset. If the entire ag operation is located on a single parcel, it will require the sale of the entire ag property and thus the operation, resulting in the loss of a family farm. The advantage of multiple parcels, particularly with mixed Economic Components, is that one of the smaller parcels can be sold without endangering the continuation of the family owned operation.

- Distribution to Heirs – One of the most disappointing events with which I have been involved during my career is the dissolution of the family farm and the resulting dissolution of family harmony following the death of a parent. Unfortunately, this is not an uncommon occurrence. This may or may not be triggered by an estate tax. Often it occurs as the family tree grows over the generations, resulting in multiple beneficiaries to the major family asset – the family ranch or farm. Typically, a family owned ag operation is run by one member of the family, while the number of non-involved family members grows over the subsequent generations. Because the income potential of the ag property, particularly grazing land, is low relative to its market value, often only one family member can make a full-time living by living on and operating the ranch or farm. The other family members, whose inheritance is tied up in the property, become anxious to realize the value of their share of the asset, especially when they don't live or work on the property. Over time, Santa Barbara County has seen more and more local farming and ranching families split up as the children and grandchildren move to metropolitan areas where they can make a living, having found it difficult to find adequate jobs in this area. County regulations that restrict the number of principal residences on these farms and ranches makes it difficult for these family members to live on the land in which they have an ownership interest. This creates pressure for the sale of the asset which often causes dissension between the operating members and the non-operating members of the family. The property is sold, the long time family member running the operation is displaced, and another family farm succumbs.

The proposed division of the Property into viable agricultural units results in a scenario that allows more than one branch of the family to live on the Property (because of the resulting separate parcels), to operate their farms and ranches as individual viable units or to share the management responsibilities based upon skill and interest levels. This also provides an opportunity to sell a parcel or two to satisfy the family members desiring a liquidity event, or for the payment of inheritance taxes, while retaining the stand-alone agricultural viability of every one of the Parcels.

THE OBJECTIVES OF A SUBDIVISION RELATIVE TO THE PROPERTY'S ECONOMIC COMPONENTS

The Proposed Subdlvision should be configured to meet two primary objectives:

- Each Proposed Parcel should have sufficient critical mass of one or more Economic Components in order to maintain economic viability of that Parcel.
- The number of Proposed Parcels should be sufficient to provide maximum flexibility to optimize management, capitalization, and financibility of different operations dictated by the Economic Component, while providing an optimum number of parcels to allow for future liquidity events that will help respond to estate taxes or family distributions.

The two above objectives must be balanced with one other. For example, the more Parcels resulting from the Proposed Subdivision, the better the optimization for providing liquidity to meet the future needs for estate taxes, family distributions, and financing. However, too many Parcels would result in individual Parcel sizes that are too small to retain long-term agricultural viability.

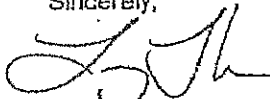
The Proposed Subdivision appears to be designed to achieve an effective balance between these two objectives. Parcels 1 through 8 provide plantable vineyard ground ranging from 78 acres to 143 acres, all of which are sufficient critical mass for a commercially viable operation. They could each house a small winery for processing the grapes grown thereon, and lots 1 through 4 would be most attractive for a winery given their frontage on Foxen Canyon Road. These eight parcels alternatively provide prime farming ground ranging from 38 acres to 81 acres, all of which could be commercially viable agriculturally. Parcels 9 through 13 are the larger parcels, with a major Economic Component being cattle grazing, but each with sufficient area for prime production such as row crops, orchards or vineyards. See the Agricultural Viability Study by Sage Associates dated September 2007, and update thereto dated 9/28/09 for further discussion about the economic viability of each Proposed Parcel.

CONCLUSION

The long term agricultural viability of the Property is enhanced by the Proposed Subdivision by creating economically efficient units of Economic Components. The resulting thirteen parcels provide maximum flexibility to match management, capitalization, and financing for each Parcel to meet future changing market conditions and agricultural intensification, while maintaining Parcel sizes that provide economic viability of each Parcel, and therefore the continued sustainability of the Property's agricultural operations.

Please do not hesitate to contact me if you have any questions or desire further information.

Sincerely,



Larry Lahr
President

EXHIBIT A

RANCHO LA LAGUNA

AGRICULTURAL ECONOMIC UNITS OF PROPOSED PARCELIZATION

	GROSS	NET	PRIME AG VINEYARD	GRAZING VINEYARD	TOTAL VINEYARD
Lot 1	202.16	197.62 100%	74.59 38%	68.37 35%	142.96 72%
Lot 2	166.42	161.79 100%	54.46 34%	62.72 39%	117.18 72%
Lot 3	166.41	163.06 100%	53.41 33%	59.44 36%	112.85 69%
Lot 4	191.63	191.07 100%	81.41 43%	28.58 15%	109.99 58%
Lot 5	160.01	160.01 100%	40.00 25%	37.97 24%	77.97 49%
Lot 6	161.23	161.23 100%	37.80 23%	55.83 35%	93.63 58%
Lot 7	206.00	206.00 100%	64.73 31%	62.19 30%	126.92 62%
Lot 8	259.01	259.01 100%	48.75 19%	34.91 13%	83.66 32%
Lot 9	438.44	438.44 100%	20.12 5%	2.65 1%	22.77 5%
Lot 10	596.84	596.84 100%	7.18 1%	9.00 2%	16.18 3%
Lot 11	428.80	428.80 100%	20.41 5%	0 0%	20.41 5%
Lot 12	369.07	369.07 100%	39.46 11%	0 0%	39.46 11%
Lot 13	604.73	600.75 100%	14 2%	0 0%	14.00 2%
TOTAL	3950.75	3933.69 100%	556.32 14%	421.66 11%	977.98 25%

2.0 Comprehensive Plan Consistency

REQUIREMENT	DISCUSSION
<i>AGRICULTURAL ELEMENT</i>	
<p><i>Goal I: Santa Barbara County shall assure and enhance the continuation of agriculture as a major viable production industry in Santa Barbara County. Agriculture shall be encouraged. Where conditions allow, (taking into account environmental impacts) expansion and intensification shall be supported.</i></p> <p><i>Policy I.A. The integrity of agricultural operations shall not be violated by recreational or other non-compatible uses.</i></p> <p><i>GOAL II. Agricultural lands shall be protected from adverse urban influence.</i></p> <p><i>Policy II.D. Conversion of highly productive agricultural lands whether urban or rural, shall be discouraged. The County shall support programs which encourage the retention of highly productive agricultural lands.</i></p> <p><i>GOAL III. Where it is necessary for agricultural lands to be converted to other uses, this use shall not interfere with remaining agricultural operations.</i></p> <p><i>Policy III.A. Expansion of urban development into active agricultural areas outside of urban limits is to be discouraged, as long as infill development is available.</i></p>	<p>Inconsistent: The project site is located within a remote rural area of the County and is primarily utilized for agricultural cultivation/farming and cattle grazing. The proposed project would subdivide the existing 3,951-acre lot zoned AG-II-100 (agriculture, 100 acre minimum lot size) into 13 lots ranging in size from 160-acres to 605-acres. Each lot would contain a Residential Development Envelope (RDE) in which future residential development consisting of a single family dwelling and accessory structures would be located. Agricultural uses and structures could be located outside of the RDEs.</p> <p>The proposed project has the potential to create conflicts between the existing agricultural operations and future residential uses which would be developed on the new lots. According to the Santa Barbara County Comprehensive Plan Agricultural Element, adverse urban influences to agriculture include conflicts between urban and agricultural uses. These conflicts could occur as a result of the future development of residential structures and uses within the RDEs that are located adjacent to areas of the site which have been historically utilized for agricultural cultivation. For example, the location of the RDEs on lots 1-3, 5, 7, 12 and 13 are all within close proximity to areas on the site which have been historically farmed in row crops. Specifically, the boundary of the proposed RDEs on lots 3 and 7 are approximately 50 feet from the edge of existing cultivated fields. Future residential development and uses located in such close proximity to cultivated agriculture would create conflicts between the two uses, as the common nuisances associated with cultivated agriculture (e.g. pesticides, noise, dust, odors, etc.) would</p>

REQUIREMENT	DISCUSSION
	<p>be experienced by residents living in these areas. These types of conflicts could lead to adverse modifications or reductions in the existing agricultural operations on the site which would violate the integrity and discourage the expansion of the existing agricultural operations on the project site.</p> <p>The proposed subdivision would not assure and enhance the existing agricultural operations on the site since these operations would be separated onto smaller lots which may be owned and operated by separate property owners. In addition, the acreages that are proposed for lots 1, 2, 5, 6, 12, and 13 are significantly smaller and are not consistent with the acreages of the surrounding adjacent parcels located northeast, southeast and southwest of the project site. Installing utilities such as the proposed State Small Water System, as well as access roads to serve each of the new lots may lead to additional development in this rural area since it would remove the impediments to growth which are currently in place (lack of utilities and access). The removal of these impediments could also encourage further subdivision of agriculturally zoned land located adjacent to the project site due to its perceived subdivided value.</p> <p>According to the Santa Barbara County Comprehensive Plan Open Space Element, subdividing larger ranches into smaller lots raises surrounding land values and taxes to levels which make it difficult to preserve agriculture in the County. The increased land values resulting from the proposed subdivision may lead to an increase in the speculative value of adjacent agricultural lands based on its perceived subdivided value making it less economically viable for agricultural uses. According to the Agricultural Element, once the economic viability for agricultural uses on</p>

REQUIREMENT	DISCUSSION
	agricultural land is lost, there is inherently increased pressure for further division of the property and ultimate conversion of the agricultural land to urban uses. Therefore, the proposed project would not be consistent with these Agricultural Element goals and policies.

3.0 Recommended Actions

Staff recommends denial of Case Nos. 06TRM-00000-00002/TM 14,709 and 16CUP-00000-00030 marked "Officially Accepted, County of Santa Barbara May 31, 2017, County Planning Commission Exhibits A-B", based upon the project's inconsistency with the Comprehensive Plan, and based on the inability to make the required findings.

Your Commission's motion should include the following:

1. Make the required findings for denial of the project (Case Nos. 06TRM-00000-00002/TM 14,709, 16CUP-00000-00030), including CEQA findings (Attachment A);
2. Determine that denial of the project (Case Nos. 06TRM-00000-00002/TM 14,709, 16CUP-00000-00030) is exempt from CEQA pursuant to CEQA Guidelines Section 15270, included in the attached Notice of Exemption (Attachment B); and
3. Deny the project (Case Nos. 06TRM-00000-00002/TM 14,709, 16CUP-00000-00030).

Refer back to staff if the County Planning Commission takes other than the recommended action for appropriate findings.

Attachments:

- A. Findings
- B. CEQA Section 15270 Exemption

ORIGINAL CONSISTENCY ANALYSIS

SANTA BARBARA COUNTY PLANNING COMMISSION

Staff Report for the Rancho La Laguna Tract Map & State Small Water System

Hearing Date: January 25, 2017
Staff Report Date: January 5, 2017
Case Nos.: 06TRM-00000-00002/TM 14,709
16CUP-00000-00030
Environmental Document:
Environmental Impact Report (16-EIR-01)

Deputy Director: Jeff Wilson
Division: Development Review North
Supervising Planner: John Zorovich
Supervising Planner Phone #: 805-934-6297
Staff Contact: Dana Eady
Staff Contact Phone #: 805-934-6266

OWNER / APPLICANT

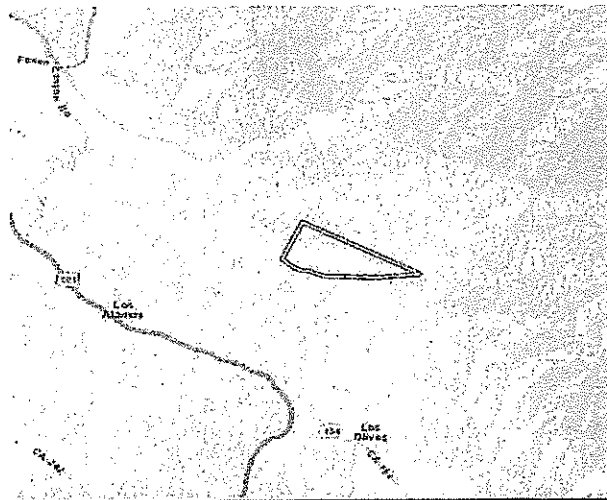
Mr. Charles V. Roven
Rancho La Laguna LLC
9200 Sunset Blvd., 10th Floor
Los Angeles, CA 90069

OWNER / APPLICANT

Mr. Leo A. Hanly
La Laguna Ranch Co. LLC
2221 Meridian Blvd., Ste. A
Minden, NV 89423-8360

AGENT / ATTORNEY:

Ms. Susan F. Petrovich
Brownstein Hyatt Farber Schreck, LLP
1020 State Street
Santa Barbara, CA 93101-2711
(805) 882-1405



This site is identified as Assessor Parcel Numbers 133-080-026, -036, and a portion of -037, located approximately 7.5 miles north of the town of Los Olivos and 7.5 miles northeast of the town of Los Alamos, in the Third and Fifth Supervisorial Districts.

Application Complete: July 11, 2008
Processing Deadline: 180 days from certification of EIR

1.0 REQUEST

Hearing on the request of Susan Petrovich, agent/attorney for Rancho La Laguna LLC, and La Laguna Ranch Co. LLC, owners, to consider the following:

- a) Case No. 06TRM-00000-00002 [application filed on July 25, 2006] for approval of a Vesting Tentative Tract Map in compliance with County Code Chapter 21 to subdivide 3,951 acres into 13 lots ranging in size from 160 acres to 605 acres, on property zoned AG-II-100;
- b) Case No. 16CUP-00000-00030 [application filed on December 20, 2016] for approval of a Minor Conditional Use Permit for a state small water system with a total of 14

project site into 13 legal lots with RDEs located in areas that create a balance between the existing agricultural operations and future residential uses on the lots.

Reduced Lots Alternative

The reduced lots alternative would subdivide the project site into 8 lots rather than 13. While this alternative would reduce the area required for access road, driveway, utility infrastructure and RDE improvements, none of these changes would affect the project's impacts on the rural agricultural character of the site, scenic vistas, or light and glare impacts. The environmental impacts associated with this alternative would not be significantly reduced and none of the identified Class II impacts would be changed to Class III. Finally, this alternative would not meet the basic project objective to subdivide the project site into 13 legal lots.

6.2 Comprehensive Plan Consistency

REQUIREMENT	DISCUSSION
Comprehensive Plan Land Use Element	
Land Use Development Policies	
<i>Land Use Element Designation: Commercial Agriculture (AC). AG-II-100 zone district under the Land Use & Development Code.</i>	<p>Consistent: The proposed project is consistent with the Agricultural Commercial (AC) land use designation, which is for commercially farmed, privately owned land located within either Rural, Inner-Rural, Existing Developed Rural Neighborhoods or Urban Areas which are subject to a Williamson Act Contract or lots 40 acres or larger which are eligible for a Williamson Act Contract.</p> <p>The project site is zoned AG-II-100, 100-acre minimum lot size. The proposed project would subdivide the 3,950.8-acre project site into 13 lots ranging in size from 160-acres to 605-acres which is consistent with the minimum lot size allowed in the AG-II-100 zone district. Future development within RDE's would consist of rural residential development that would be consistent with the existing agricultural zoning, and would be sited to retain the agricultural viability of the project site (refer to Section 4.2, Agricultural Resources of the Final EIR). Therefore, the proposed project would be consistent with the Commercial Agriculture (AC) Land Use Element designation.</p>

<p><i>Land Use Development Policy #2. The densities specified in the Land Use Plan are maximums and may be reduced if it is determined that such reduction is warranted by conditions specifically applicable to a site, such as topography, geologic or flood hazards, habitat areas, or steep slopes. However, density may be increased only under programs of the Housing Element and the Residential Agricultural Unit (RAU) program.</i></p>	<p>Consistent: The project site is zoned AG-II-100 which allows for lots with a minimum size of 100-acres. The project proposes to subdivide the existing 3,950.80 gross acre project site into 13 lots ranging in size from 160-acres to 604.7-acres in size. All of the proposed lots exceed the minimum lot size of 100-acres, and 8 of the proposed lots exceed 200-acres which is more than twice the size of the 100-acre minimum lot size. The EIR analyzed the potential environmental impacts resulting from the proposed project to existing topography, geologic or flooding hazards, habitat and steep slopes. The EIR determined that there would be no Class I significant and unavoidable impacts, and that any Class II impacts could be mitigated to less than significant levels. Therefore, the proposed density of lots is appropriate for the proposed project. Finally, the RAU program is no longer in effect. Therefore, the proposed project is consistent with this policy.</p>
<p><i>Land Use Development Policy #4. Prior to issuance of a development permit, the County shall make the finding, based on information provided by environmental documents, staff analysis, and the applicant, that adequate public or private services and resources (i.e., water, sewer, roads, etc.) are available to serve the proposed development. The applicant shall assume full responsibility for costs incurred in service extensions or improvements that are required as a result of the proposed project. Lack of available public or private services or resources shall be grounds for denial of the project or reduction in the density otherwise indicated in the land use plan.</i></p>	<p>Consistent: Adequate services are available to serve future development associated with the proposed project.</p> <p><u>Access:</u> Access to the project site would continue to be provided by an existing private driveway from Foxen Canyon Rd. Access to the newly created lots would be provided by existing access roads located on the project site. Shared access easements would follow these existing roads and would utilize existing creek crossings. Individual driveways would extend from these private shared access roads to serve each of the proposed RDEs. Shared access and utility easements would be provided as indicated on page 2 of 2 of the tract map (Attachment E).</p> <p><u>Water:</u> The project site receives water from the San Antonio and Santa Ynez Uplands groundwater basins. According to the EIR (16-EIR-01), the proposed project would not</p>

	<p>result in a significant change in the quantity, quality, direction or rate of flow of groundwater. Based on the water demand estimate for the potential future development of 13 single-family dwellings calculated per the County Environmental Thresholds and Guidelines Manual, the estimated gross water demand for the proposed project is expected to be 14.95 acre feet per year (AFY). County thresholds indicate that a significant impact to the San Antonio groundwater basin may occur if new development generates a water demand of 23 AFY or more. The threshold of the Santa Ynez Uplands groundwater basin is 61 AFY per year. Therefore, the estimated total gross water demand for future potential residential development is below the County Threshold for both subject groundwater basins.</p> <p>An existing water system would continue to provide water for agricultural uses. Domestic water would be provided by a proposed state small water system approved in conformance with Environmental Health Services (EHS) requirements. Water for the proposed water system would be provided by well #13 located on proposed lot 12. According to the Water Well Completion Report (Simmons, 2006) prepared for the proposed project, this well meets and exceeds the 39 gallons per minute (gpm) testing requirement for the proposed water system, and is adequate to provide water for the State Small Water System. In addition, the composition of the well water meets or exceeds the water chemical standards for drinking water as established by the State of California Department of Health. Shared water agreements would give each lot owner an equal right to each of the shared water systems for agricultural and domestic use.</p> <p><u>Wastewater:</u> Sanitary services would be provided by proposed septic systems built in conformance with Environmental Health Services requirements, and are consistent with</p>
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	<p>California Regional Water Quality Control Board requirements.</p> <p><u>Fire Protection:</u> Fire protection would be provided by the Santa Barbara County Fire Department Station #24 located in Los Alamos (closest, 9 miles), and Station #31 in Buellton (closest back-up).</p> <p><u>Police Protection:</u> Police protection would be provided by the Santa Barbara County Sheriff's Department.</p> <p>Therefore, the proposed project is consistent with this policy.</p>
Hillside and Watershed Protection Policies	
<p><i>Policy 1: Plans for development shall minimize cut and fill operations. Plans requiring excessive cutting and filling may be denied if it is determined that the development could be carried out with less alteration of the natural terrain.</i></p> <p><i>Policy 2: All developments shall be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so that grading and other site preparation is kept to an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of the site which are not suited to development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.</i></p> <p><i>Policy 3: For necessary grading operations on hillsides, the smallest practical area of land shall be exposed at any one time during development and the length of exposure shall be kept to the shortest practicable amount of time. The clearing of land should be avoided during the winter rainy season and all measures for removing sediments and stabilizing slopes should be in place before the</i></p>	<p>Consistent: The proposed project would require grading for improvements to existing access roadways and driveways, construction of new driveways to the RDEs, as well as the installation of utility lines. The RDEs are located in areas of the project site which do not contain steep slopes or unstable areas and are outside of flood zones. Therefore, any grading associated with future construction within the RDEs would be minimized to the maximum extent feasible. In addition, the proposed access roadways and utility alignments have been designed to minimize grading while meeting fire safety requirements (i.e., turning radius, roadway slope) for site access.</p> <p>The water lines and infrastructure associated with the proposed water system would be located within existing roadways and in areas of the site which do not contain steep slopes. Any excess cut generated from grading activities would be used as additional fill to offset shrinkage and compaction of cut material, or to supplement grades elsewhere on the site. No offsite hauling of excess material is proposed.</p> <p>As described in Section 4.4, Biological</p>

<p><i>beginning of the rainy season.</i></p> <p><i>Policy 5: Temporary vegetation, seeding, mulching, or other suitable stabilization method shall be used to protect soils subject to erosion that have been disturbed during grading or development. All cut and fill slopes shall be stabilized as rapidly as possible with planting of native grasses and shrubs, appropriate non-native plants, or with accepted landscaping practices.</i></p> <p><i>Policy 7: Degradation of the water quality of groundwater basins, nearby streams, or wetlands shall not result from development of the site. Pollutants, such as chemicals, fuels, lubricants, raw sewage, and other harmful waste, shall not be discharged into or alongside coastal streams or wetlands either during or after construction.</i></p> <p><i>Streams and Creeks Policy 1: All permitted construction and grading within stream corridors shall be carried out in such a manner as to minimize impacts from increased runoff, sedimentation, biochemical degradation, or thermal pollution.</i></p>	<p>Resources of the Final EIR (Attachment C), mitigation measures provided in the EIR address the removal of native vegetation required for future residential development within the RDEs, and construction of the proposed access roadways and utility alignments. As a result, significant amounts of native vegetation would not be removed.</p> <p>The proposed RDEs are located outside of drainages and stream corridors. However, the proposed access road alignments would cross existing drainages and stream corridors. Therefore, grading for development of access road improvements and construction of driveways accessing the proposed RDEs has the potential to impact onsite stream corridors/drainages. Mitigation measures which have been included as conditions of approval (Condition Nos. 23-27, 30 of Attachments B.1, and B.2), would mitigate any significant impacts to stream corridors and drainages to less than significant levels. These include avoidance measures where feasible, habitat restoration requirements, agency coordination, and the completion of a jurisdictional delineation if impacts to wetlands and drainages from roadway crossings cannot be avoided.</p> <p>In order to prevent degradation of the water quality of groundwater basins, nearby streams, or wetlands, future grading and construction activities on the newly created lots would be required to adhere to standard County requirements including a Storm Water Pollution Prevention Plan (SWPPP), Best Management Practices, and Erosion Control Plans. These plans require exposed soils to be minimized, avoidance of grading and construction activities during the rainy season, slope stabilization, and erosion control. Compliance with these measures would ensure that pollutants are not discharged into or along coastal streams or wetlands either during or</p>
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	after construction. Therefore, the proposed project would be consistent with these policies.
Historical and Archaeological Sites Policies	
<i>Policy 2: When developments are proposed for lots where archaeological or other cultural sites are located, project design shall be required which avoids impacts to such cultural sites if possible.</i>	Consistent: A Phase I survey of the project site for the presence of cultural resources was completed for the proposed project (Dudek, 2014). The survey was limited to the RDEs, access roads, and areas where utility lines would be installed with slopes of 30 percent or less. No archaeological or cultural sites were identified within the areas surveyed. However, the possibility still exists that subsurface archaeological remains could be encountered during grading activities. Therefore, the Final EIR prepared for the project (Attachment C) includes a mitigation measure requiring all work to be stopped or redirected immediately in the event archaeological remains are encountered during grading, construction, landscaping or other construction related activities. The applicant shall retain a P&D approved archaeologist and Native American representative to evaluate the significance of the find in compliance with County Cultural Resource Guidelines provisions for Phase 2 and Phase 3 investigations. This requirement is included as Condition No. 33 of Attachments B.1 and B.2. Therefore the proposed project is consistent with these policies.
Visual Resource Policies	
<i>Policy 2: In areas designated as rural on the land use plan maps, the height, scale, and design of structures shall be compatible with the character of the surrounding natural environment, except where technical requirements dictate otherwise. Structures shall be subordinate in appearance to natural landforms; shall be designed to follow the natural contours of the landscape; and shall be sited so as not to intrude into the skyline as seen from public viewing places.</i>	Consistent: Future residential development on the newly created lots would be located entirely within proposed Residential Development Envelopes (RDEs), which contain slopes of less than 20%. Three of the 13 proposed RDEs would be located in portions of the site that are partially visible from public viewpoints. The RDEs on proposed lots 1 and 2 would be visible from both Foxen Canyon Road and Alisos Canyon Road. The RDE on proposed Lot 3 would be visible from Foxen Canyon Road.

<p><i>Policy 5: Utilities, including television, shall be placed underground in new developments in accordance with the rules and regulations of the California Public Utilities Commission, except where cost of undergrounding would be so high as to deny service.</i></p>	<p>Mitigation measures from the Final EIR requiring Board of Architectural Review and approval for all future development within the RDEs and compliance with Land Use and Development Code requirements for Ridgeline and Hillside Development would ensure that the design of structures are compatible with the character of the surrounding natural environment, and subordinate in appearance to natural contours of the landscape. Any future development on-site that triggers the LUDC's guidelines for hillside and ridgeline development would also be subject to the LUDC hillside and ridgeline development standards.</p> <p>The project is conditioned (Condition No. 41 of Attachment B.1) to require all electrical utilities to be installed underground. The proposed water lines associated with the water system would be installed underground within the existing access roads and proposed driveways accessing the RDEs. Therefore, the proposed project is consistent with these policies.</p>
<p>Agricultural Element</p> <p><i>Land Use Element Regional Goal – Agriculture: In rural areas, cultivated agriculture shall be preserved, and where conditions allow, expansion and intensification should be supported. Land with both prime and non-prime soils shall be reserved for agricultural uses.</i></p> <p><i>Goal I: Santa Barbara County shall assure and enhance the continuation of agriculture as a major viable production industry in Santa Barbara County. Agriculture shall be encouraged. Where conditions allow, (taking into account environmental impacts) expansion and intensification shall be supported.</i></p> <p><i>Policy I.A: The integrity of agricultural</i></p>	<p>Consistent: Consistent: As described in Section 4.2, <i>Agricultural Resources</i>, of the Final EIR (Attachment C), the proposed project would not significantly impair the long term agricultural suitability and productivity of the site. This conclusion is based on the results of the weighted point system scores which resulted in each lot scoring above the 60 point threshold included in the County's <i>Environmental Thresholds and Guidelines Manual</i>, which indicates that all of the newly created lots would be agriculturally viable.</p> <p>Agricultural uses on the project site consist of a combination of cattle grazing (3,934-acres), and cultivated farmland (563-acres). Cultivated farmland located on proposed lots 1-9, and 11-</p>

<p><i>operations shall not be violated by recreational or other non-compatible uses.</i></p> <p><i>Policy I.D:</i> <i>The use of the Williamson Act (Agricultural Preserve Program) shall be strongly encouraged and supported. The County shall also explore and support other agricultural land protection programs.</i></p> <p><i>Policy I.F:</i> <i>The quality and availability of water, air, and soil resources shall be protected through provisions including but not limited to, the stability of Urban/Rural Boundary Lines, maintenance of buffer areas around agricultural areas, and the promotion of conservation practices.</i></p> <p><i>Goal II:</i> <i>Agricultural lands shall be protected from adverse urban influence.</i></p> <p><i>Policy II.D:</i> <i>Conversion of highly productive agricultural lands whether urban or rural, shall be discouraged. The County shall support programs which encourage the retention of highly productive agricultural lands.</i></p> <p><i>Goal III:</i> <i>Where it is necessary for agricultural lands to be converted to other uses, this use shall not interfere with remaining agricultural uses.</i></p> <p><i>Policy III.A:</i> <i>Expansion of urban development into active agricultural areas outside of urban limits is to be discouraged, as long as infill development is available.</i></p>	<p>13 are currently leased and includes a rotation of various irrigated row crops and dryland hay/grain crops. According to the EIR, proposed lots 1 through 8 provide sufficient area for vineyards for a commercially viable winery operation or farming operations which would ensure agricultural viability on these lots. Proposed lots 9 through 13 are larger lots (369.07-acres to 604-acres) allowing for continued cattle grazing as well as prime production of row crops, orchards or vineyards.</p> <p>The proposed project is designed with lots that are generally sized to conform to the lot sizes of adjacent lots. Specifically, lots 1-4 and 5-8 range in size from 160.01-acres to 259.01-acres which is similar in size to the lots located to the south which range from 85 to 400-acres in size. Lots 9-13 are larger lots which range in size from 369.07-acres to 604.73-acres. These lots are similar in size to lots located to the north, east and west of the site which range in size from 298-acres to 1,000-acres.</p> <p>The existing agricultural uses on the project site would remain, and there would be adequate area available for the expansion and intensification of onsite agricultural uses on each of the newly created lots. No recreational or non-compatible land uses are proposed. In addition, in order to avoid interference with existing agricultural uses on the site, the proposed access roads and driveways would follow existing agricultural roads, and RDE's would not be located in areas which contain cultivated agriculture.</p> <p>The project site was previously enrolled in the Agricultural Preserve Program (67-AP-003B). However, a request for non-renewal became effective on December 31, 2006, and the Williamson Act contract for the property expired on December 31, 2016. The proposed project was reviewed by the Agricultural</p>
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	<p>Preserve Advisory Committee (APAC) on October 8, 2008 and found to be consistent with the Uniform Rules for Agricultural Preserves and Farmland Security Zones.</p> <p>All of the newly created lots are eligible to be enrolled under Williamson Act contracts. Participation in the program is voluntary by the County and by the eligible landowners. The project description proposes replacement contracts for lots 9-13, which are larger lots (369.07-acres to 604-acres) that would be primarily used as grazing land for cattle. The primary agricultural use on proposed lots 1-8 (160.01-acres to 259.01-acres) would continue to be cultivated agriculture. According to the applicant, this type of agricultural use does not offer the same benefits from the Agricultural Preserve Program as lots which are primarily used for grazing land. However, these lots would be eligible for Williamson Act contracts if future land owners elect to enroll them in the program. The new contracts would be required to be reviewed and approved by the APAC to ensure that they are consistent with the Uniform Rules.</p> <p>The project site is located in a rural area. The proposed subdivision and future residential development within the RDEs would not be considered an urban use. As defined in the Land Use Element, (residential) urban development is defined as residential development at a density higher than one unit per five gross acres. The project would allow for the development of one residential unit on each lot, and the lot sizes range from 160-acres to 605-acres.</p> <p>The quality and availability of air, water, and soil resources on the project site would not be adversely affected by the proposed subdivision since future residential development would be limited to one main residence and accessory structures located within the proposed RDE's,</p>
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	and the project does not include urban development (as defined by the Land Use Element) which would affect the stability of the Urban/Rural boundary line. Therefore, the proposed project is consistent with these policies and goals.
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6.3 Zoning: Land Use and Development Code Compliance

6.3.1 Compliance with Land Use and Development Code Requirements

Purpose of AG-II Zone District (35.21.020.B.1): The AG-II zone is applied to areas appropriate for agricultural land uses on prime and non-prime agricultural lands located within the Rural Area as shown on the Comprehensive Plan maps. The intent is to preserve these lands for long-term agricultural use. The AG-II-100 zone district allows for the creation of new lots provided the new lots meet the 100 acre minimum lot size requirement. The proposed lots would range in size from 160 acres to 604.7 acres and would be consistent with the 100 acre minimum lot size.

Water System: The proposed state small water system (5 or more connections) is allowed with a Minor Conditional Use Permit per LUDC Section 35.21.040 (Table 2-1).

6.4 Chapter 21, County Code (Subdivision Regulations)

The proposed Tract Map would be consistent with the rules and regulations of the County's subdivision regulations as described in the findings (Attachment A). The proposed lots would conform to the following applicable configuration requirements as outlined in Chapter 21, Section 21-24:

Lot depth. No lot shall be created the rear line of which is less than 100 feet from the front line of the lot, except that one sideline may be less than one hundred feet in length if it terminates at a corner curve or cul-de-sac turn-around curve. In the case of through lots or corner lots, at least one lot line must be parallel to and not less than one hundred feet distant from the street on which the lot fronts. The rear line of a lot shall be considered as any lot line other than a front line which does not intersect the right-of-way line of the street on which the lot fronts.

Consistent: The proposed project would not create rear property lines which are less than 100 feet from the front line of the lot.

**Table 4.2-8
Consistency with Agricultural Policies in the
Comprehensive Plan Agricultural Element and Land Use Element**

Policy	Consistency
<p>Comprehensive Plan Land Use Element Regional Goal - Agriculture: In rural areas, cultivated agriculture shall be preserved and, where conditions allow, expansion and intensification should be supported. Lands with both prime and non-prime soils shall be reserved for agricultural uses.</p>	<p><u>Consistent</u> The results of the Weighted Point System (WPS) scores (with each lot scoring above the 60-point threshold) indicate that all of the newly created parcels would be agriculturally viable. The proposed access roads, RDEs, and infrastructure would be located in areas of the site which contain both prime and non-prime soils. However, proposed access roads and driveways would follow existing agricultural roads, and RDEs would not be located in areas which contain cultivated agriculture. Any future widening of access roads, or future development onsite would be subject to applicable mitigation measures. The proposed project improvements would not result in a disruption of onsite agricultural operations since future residential development on the newly created parcels would be confined to RDEs (77.3 acres), leaving approximately 3,856.4 acres of land (excluding access roads and driveways) available for agricultural uses (97% of the site). The existing agricultural uses on the subject parcel would remain, and there would be adequate area available for the expansion and intensification of onsite agricultural uses on each of the newly created parcels. In addition, based on compliance with existing zoning regulations and future Williamson Act contracts on Lots 9 through 13, the project would not convert agricultural land to non-agricultural use. Therefore, the project would be consistent with this policy.</p>
<p>Policy I.A: The integrity of agricultural operations shall not be violated by recreational or other non-compatible uses.</p>	<p><u>Consistent</u> Future development within the RDEs would not include recreational or other non-compatible uses. As described in Impact AG-1, the project would not significantly impair the long-term agricultural suitability and productivity of the project site, based on application of the County's adopted weighted point system and other site-specific considerations. Further, as described in Impact AG-3, compliance with the County's Right-to-Farm Ordinance and Uniform Rules would ensure that impacts related to conflicts between residences and agricultural operations remain less than significant. Therefore, the project would be consistent with this policy.</p>
<p>Policy I.D. The use of the Williamson Act (Agricultural Preserve Program) shall be strongly encouraged and supported. The County shall also explore and support other agricultural land protection programs.</p>	<p><u>Consistent</u> The project site is currently under a Williamson Act Contract. However, a request for non-renewal was accepted by the Santa Barbara County Board of Supervisors on November 1, 2006, and became effective on December 31, 2006. The Williamson Act contract for the property therefore ends on December 31, 2015. The Williamson Act contract for the project site expired on December 31, 2015. The applicant proposes new Williamson Act contracts for five of the 13 lots (Lots 9 through 13) prior to recordation of the proposed subdivision map. For Lots 1 through 8, the future lot</p>

**Table 4.2-8
Consistency with Agricultural Policies in the
Comprehensive Plan Agricultural Element and Land Use Element**

Policy	Consistency
	owners would be responsible for determining whether to enter into a Williamson Act contract. Because the project would not discourage enrollment in the Williamson Act, the project would be consistent with this policy.
Policy II.D. Conversion of highly productive agricultural lands whether urban or rural, shall be discouraged. The County shall support programs which encourage the retention of highly productive agricultural lands.	Consistent As described above, the project would not convert prime agricultural land to non-agricultural use based on the WPS scores (with each lot scoring above the 60-point threshold). In addition, based on compliance with existing zoning regulations and future Williamson Act contracts, where applicable (as described below), the project would not convert agricultural land to non-agricultural use. Further, the potential conversion of grazing land or crop land to higher yield crops would not impair agricultural land productivity, and may actually increase productivity. Therefore, the project would be consistent with this policy.
Policy III.A. Expansion of urban development into active agricultural areas outside of urban limits is to be discouraged, as long as infill development is available	Consistent The project site is located in a rural area. The proposed subdivision and future residential development of the site would not be considered an urban use. As defined in the Land Use Element, (residential) urban development is defined as residential development at a density higher than one unit per five gross acres. The project would allow development of one unit on each lot, and the lot sizes range from 160 acres to 605 acres. Therefore, the project would not introduce urban development into an active agricultural area, consistent with this policy.
Land Use Goal 3: Agriculture: In the rural areas, cultivated agriculture shall be preserved and, where conditions allow, expansion and intensification should be supported.	Consistent As described above, the project would not convert agricultural land to non-agricultural use based on the WPS scores (with each lot scoring above the 60-point threshold). In addition, based on compliance with existing zoning regulations and future Williamson Act contracts, where applicable (as described below), the project would not convert agricultural land to non-agricultural use. The project would allow for development of one single family residence on each proposed lot, retaining the majority of each lot in agriculture. Therefore, the project would be consistent with this policy.
<p>Agricultural Commercial Designation: This category is for commercially farmed, privately owned land located within either Rural, Inner-Rural, Existing Developed Rural Neighborhoods or Urban Areas which meets the following criteria:</p> <ol style="list-style-type: none"> 1. The land is subject to a Williamson Act Contract, including contracts that have been non-renewed or, 2. Parcels forty (40) acres or greater, whether or not currently being used for agricultural purposes, but otherwise eligible for Williamson Act Contract may be included if they meet requirements of Uniform Rule No.6. <p>This category includes compatible land uses and land</p>	Consistent The project site is currently designated Agricultural Commercial, and this designation would remain after implementation of the project. As described above, the project site was under a Williamson Act contract which expired on December 31, 2015. The applicant proposes new Williamson Act contracts for five of the 13 lots (Lots 9 through 13) prior to recordation of the proposed subdivision map. The remaining lots would be eligible for Williamson Act contract, and all 13 lots would be greater than 40 acres. The project would allow for the development of one single family residence on each lot. According to the Uniform Rules, a single-family dwelling is a compatible use. Therefore, the project would be consistent with the existing Comprehensive Plan

Table 4.2-8
Consistency with Agricultural Policies in the
Comprehensive Plan Agricultural Element and Land Use Element

Policy	Consistency
uses that are necessary and a part of the agricultural operations. All types of crops and livestock are included. Both "prime" and "non-prime" soils (as defined in the Williamson Act and the County's Uniform Rule No.6) and irrigated and non-irrigated lands are included. Parcels which are smaller than forty (40) acres in size at the time of adoption of this Element may be eligible for the AC designation if they are "prime" or "super-prime" as defined by the County Uniform Rules and are eligible for agricultural preserve status.	designation of Agricultural Commercial.

Source: Santa Barbara County, Planning and Development, republished May 2009.

The project site is zoned AG-II-100 under the County's LUDC. The intent of the AG-II zone is to preserve these lands for long-term agricultural use. The AG-II zone also includes a minimum gross lot area designation that limits the subdivision potential of land and in some cases affects the range of allowable land uses. The proposed new lots would each retain the AG-II-100 zoning designation. Consistent with this zoning, each lot would be greater than 100 acres in size. In addition, the AG-II zone allows for the construction of a one-family dwelling. Therefore, the subdivision of the project site and future development within the RDEs would not conflict with existing agricultural zoning. In addition, as described under Discontinued Agricultural Use above, future non-agricultural development would not be allowed in accordance with the zoning of each lot (AG-II-100).

- *Viability of Continued or Intensified Agricultural Operations.* In February 2010, Rincon Corporation performed a review of the property for the purpose of understanding the viability of continued or intensified agricultural operations for the 13 proposed parcels (Rincon Corporation, February 2010; refer to Appendix B). According to the report, Lots 1 through 8 provide sufficient plantable vineyard ground for a commercially viable winery operation, or could provide commercially viable prime farming. Parcels 9 through 13 are larger parcels, allowing for continued cattle grazing as well as prime production of row crops, orchards, or vineyards. All 13 parcels could continue to be agriculturally viable, and may allow for intensification of agriculture.
- *Conflicts with Williamson Act Contracts.* The Williamson Act contract for the project site expired on December 31, 2015. The applicant proposes new contracts for proposed Lots 9 through 13. For Lots 1 through 8, the future lot owners would be responsible for determining whether to enter into a Williamson Act contract. All 13 proposed lots were reviewed on October 3, 2008 by the Agricultural Preserve Advisory Committee and found to be consistent with the Uniform Rules. All proposed lots are therefore eligible for agricultural preserve contracts and the applicant has agreed, and will be required as a condition of project approval, to apply for the replacement contracts for Lots 9 through 13 prior to recordation of the proposed subdivision map. Future lot owners of Lots 1 through 8 may also elect to enter into a Williamson Act contract. Pursuant to application for replacement contracts, and compliance with the Uniform Rules (as discussed under