



December 16, 2010

Chair Olson and Members of the GVPAC
County of Santa Barbara
Office of Long Range Planning
30 E Figueroa St, 2nd Floor
Santa Barbara, CA 93101

RE: Goleta Valley Community Plan Administrative Draft

Dear Chair Olson & Members of the GVPAC:

Throughout the Goleta Valley Community Plan update process, we have provided input regarding the land use policies pertaining to the San Marcos Growers site (APNs 065-040-41 and 065-030-12) in an effort to help the GVPAC become familiar with the site's history and future benefits.

- It originally had a residential land use designation, which was downzoned to agriculture in the 1993 Goleta Valley Community Plan. Action LUA-GV-1.2 in the 1993 Plan requires that the San Marcos Growers site land use designation be re-evaluated for residential and/or mix-uses after ten years from the adoption of, or expiration of the 1993 Plan Community Plan;
- It primarily consists of nursery greenhouses and above ground plant production, which have no reliance on urban agricultural land. It may have prime agricultural soil, but that site has not been used for agricultural crops for at least thirty years and is unlikely to be so used in the future;
- It is surrounded by existing uses incompatible with agriculture, including residential, commercial and educational uses; and
- It is a classic in-fill site located along a major transportation corridor, providing immediate access to transit, employment, shopping and education services in the community, all of which is very consistent with the County's smart growth principles.

In response to the Community Development and Land Use Administrative Draft dated October 19th, 2010, we do not believe the policies regarding the San Marcos Growers site are appropriate for a twenty-year community plan.

We anticipate continued pressure from the State requiring additional infill housing opportunities to be provided in Santa Barbara County, specifically in south county, and



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to reduce green house gases. While the document identifies the challenges imposed on this urban site to effectively operate it for agricultural uses, it provides unrealistic criteria which must be met in order to utilize it as an infill housing opportunity.

Policy LUA-EGV-2.7 specifically requires that agricultural conversion considerations only occur on sites without active agricultural, prime soils, prime agricultural land classification, or potential for urban agricultural uses. This policy language directly prohibits alternative land uses on the San Marcos Growers site, which would be ideal for pursuing infill and smart growth principles in the County. This specific policy language should be deleted and replaced with alternative language which balances the community benefit to meet the growing demand for housing close to transportation, shopping, and jobs.

We request that the GVPAC closely review the policies pertaining to the San Marcos Growers site so that the Community Plan can provide smart and consistent land use direction for the next twenty years.

Sincerely,

THE TOWBES GROUP, INC

A handwritten signature in blue ink, appearing to read 'Michael Towbes', is written over the printed name.

By: MICHAEL TOWBES
Chairman

cc: Santa Barbara County Board of Supervisors
Santa Barbara County Planning Commission
Vicki Parker, Deputy Director, Santa Barbara County Office of Long Range
Planning
Craig Minus, Project Manager, The Towbes Group

Except From 1993 Community Plan

located within the boundaries of LPNF, although only a portion of this land is actually owned by the Forest Service.


Approximately 12,800 acres are designated as Mountainous Area with Mountainous zoning (see Figure 8 on page 26). Minimum parcel size in this area ranges from 40 to 320 acres, with 5 to 20 acre ranchette zoning in the existing developed neighborhoods. These designations would allow some residential development and limited agricultural expansion in these areas as long as such development was consistent with the intent of this district regarding the protection of watershed qualities and erosion control. The goals and policies which assist in the protection of these values are contained in the resource and constraints section of this plan, and relate to minimizing erosion and protecting visual resources and critical habitats. The guidelines of the Mountainous Zone District also apply.

2. POLICIES AND IMPLEMENTING STRATEGIES

The following policies address such issues as the preservation of agricultural lands, the protection of agriculture from encroachment or negative effects of neighboring uses, methods for retaining lands in agricultural uses, and water conservation.

Policy LUA-GV-1: Land designated for agriculture within the urban boundary shall be preserved for agricultural use, unless the County makes findings that the land is no longer appropriate for agriculture or there is an overriding public need for conversion to other uses for which there is no other land available in the Goleta urban area.

Action LUA-GV-1.1: Parcels 79-120-47, 94 (Couvillion) shall have a land use designation of A-I-10. At such time as the Board of Supervisors authorizes the contract for the construction of Cathedral Oaks Road, the County shall initiate a General Plan amendment and rezone for a medium to low residential designation for this site consistent with surrounding land uses and should also consider it for inclusion in the County's Affordable Housing program.

 **Action LUA-GV-1.2:** Parcels 65-040-41, 65-080-08, 09, 10, 11, 20, and 24 (San Marcos/Hollister NW) should have a land use designation of A-I-5 for the life of this Plan or for ten years from the adoption of this Plan, whichever occurs first. At that time, the County shall review these parcels to determine if the agricultural designation is still appropriate. If not, medium to low residential designations consistent with surrounding land uses should be considered for all of the 65-080- parcels and a mix of commercial and medium to high density residential should be considered for parcel 65-040-41. All of the residential parcels should also be considered for inclusion in the County's Affordable Housing program.

Action LUA-GV-1.3: Parcel 69-090-52 (Fairview Gardens) should have a land use designation of A-I-5 for the life of this Plan or for ten years, whichever occurs first. At that time, the County shall review this parcel to determine if the agricultural designation is still appropriate. If not, the County should consider a medium to low residential designation consistent with surrounding land uses for the site and should also consider it for inclusion in the County's Affordable Housing program.