

TO: Erika Leachman, Staff, and GVPAC Committee Members
FROM: Bonnie Freeman, GVPAC Committee Member
DATE: February 21, 2011
RE: Feb. 7th letter from Christina McGinnis/OPEN/EDC

This letter is in response to the above noted letter re **Goleta Community Plan Update: Agricultural Resources in Section II, Land Use**

Similar to Christina's intent to engage all interested parties in the developing policies and programs to protect agriculture, I began reaching out to farmers and growers several years ago to hear the issues directly. I engaged in one-on-one interviews with both the Ag community and the residential communities that surround urban agriculture, providing a factual Power Point presentation over a year ago and a packet of individual surveys from the group meetings held in homes adjacent to agriculture, in the So. Patterson tract, at the Community Presentation a year ago. I have also steeped myself into the dense language of the old Community Plan of 93, the Land Use Element, and Chapter 35 of the Land Use & Development Code, parts of the Local Coastal Plan as well as engaging head-on with the recent Coastal Commission's Modification Amendments.

I am not the expert but I have developed opinions from participating in the above actions, and felt it was my obligation to make comments on Ms. McGinnis'/EDC's recommendations, which are:

1. The GCP should contain a refined definition of the allowed uses under the new UA-EGV agricultural zone district

A two-tier approach is recommended, the first would apply to properties containing prime soils and/or those in active agricultural use, and properties with agricultural potential, and the second tier would apply to those properties with non-prime soils that are not in active agricultural use and that lack agricultural potential. The intent would be to reduce the allowable uses in Tier 1, and allow more uses in Tier II.

I am responding only as it applies to URBAN agriculture, and more specifically the South Patterson Ag Block, although the San Marcos Ag Block could be applied as well.

Regarding the referenced 2002 report entitled "Goleta Valley Urban Agriculture", I found that the report does not reflect an up to date picture of urban agriculture today. For example: (report: Urban farms provide nearby residents with locally grown produce)

Nearby residents are only provided with 4% of the food grown locally*₁
(report: Urban farms provide "food security")

"Food Security" if defined as providing most of our food locally, has been shown to be unrealistic*₂

*₁ see article on UCSB environmental studies professor David Cleveland's recent research on food localization (attached)
"Buying local just can't be seen as a cure-all." researchers finding.

*₂ "If we only focus on localization, it wouldn't be enough to reduce our carbon footprint" Corie Radka, research Asst.

The handful of vegetable farmers themselves say it's a PR myth that there could be enough locally grown vegetables to feed the County unless you live on avocados* and lemons, or everyone grows their own food. As local grower John Givens stated in an early GPAC meeting, "You should have thought about saving urban agriculture 30 years ago before paving over all the valley floor", or as John Lane of Lane Farms said recently "With people trying to plan to save agriculture here, we're about 40 years too late, maybe 50 years too late, we should have been planning back then to save all the beautiful soil in the center of the valley. Here we're just too

late, it's just a good place to live.” These are two of the top local vegetable farmers in the Goleta Valley, so they are speaking about their operations specifically, not agriculture in general. The rural orchard farms* are doing well, but face future challenges as well.(see attached Independent article on Avocado growers in SBC)

So, in order to “save” viable urban agricultural parcels I would argue that the Community Plan should encourage a wide range of small-scale allowable secondary uses that, when operational, support, complement, and promote sustainable agricultural operations as viable enterprises, or we risk losing them to the high costs of land, water prices, market loss, aging owners, and other factors. That does not “save” agriculture.

I would also argue that discouraging secondary uses based on “provided that all prime soils and soils with Statewide Importance are avoided...” is a half-argument and is used to prohibit any conversion of ag land to other uses, when in fact much of the coastal “prime” soils are incompatible with many crops, including high value crops necessary for profit, due to salts and the cool ocean air, which creates a fungus that can devastate production. I am calling for a new updated study on this condition which exists along the coastal lands but is not addressed along with the prime soils. Perhaps certain fruit trees or grape varieties could be grown in-ground but otherwise it's costly greenhouses with all the unpopular factors that come with that next to housing.

And conversely, non-prime soils which may be located on inland property away from the coast, can produce a wide variety of crops by heavily amending the soil.

Some of these arguments are what have held certain property owners to languish in unproductive and failing businesses with no alternate choices to remain in business. Zoning assignments were made without the knowledge of property owners who purchased their lands two and three generations ago. While some would like to get out of their predicaments and be allowed to develop compatible properties, and yes make a profit after all the years of ownership; I've found most would like to continue or pass on Ag ownership with smaller parcels or new uses. The new allowable uses could potentially save more agricultural operations by renewing life to the land rather than punitive actions that could force some sales to undesirable operations just to get out from under. Many of the land owners have been mischaracterized as greedy when they have been responsible stewards of their lands for many years and find themselves stuck at the end of a long life in farming that is no longer viable. And with respect to the So. Patterson Mesa owners, these are wholesale floral and palm nurseries, not food producing.

In our homeowner surveys, most favored living next to growers as they do now, but would like the trucking issues to be resolved. If growers cannot sustain then they favored low density housing such as ranchettes on 5 acre parcels or homes that are similar to what's there now: 1/2 acre sites with single story homes and keeping the character of no sidewalks or streetlights. They also would like road improvements (widening) if development comes with safe bike paths for the many in community who bike to UCSB. The concept of small businesses or farm stands, etc., was not developed at the time of the meetings but I know that parking and traffic would be a concern, as well as any large events.

So I have suggested taking out <small scale restaurants> as incompatible and replacing with food carts; as well as adding the wordage “small scale” in front of “open air or farmers' markets” and temporary events”, although I feel that weddings and parties need to be looked at further and with caution as being incompatible unless it is within the owners' family. But I think the other uses mentioned are compatible and promising for continuing agricultural operations that are currently at risk.

So, in my opinion, I don't think we should accept a two-tier system as suggested by the EDC, but rather treat all So Patterson equal when implementing the proposed zone district, and letting the zone administrators address the individual site characteristics if/when proposals are brought up.

2. Policies in the GCP addressing buffers for lands adjacent to agriculturally-zoned land should be further strengthened.

In general these suggestions by OPEN/EDC seem sound but the distances should be discussed further with the community. Some properties are so narrow that to take 200' off their property makes no sense. Again, I think these should be looked at on a case-by-case basis. I know that Christina did exhaustive work in this area and worked with community partners so the work seems credible and substantial.

3. The GCP recommendations for Agricultural Conversion must be further refined.

My opinions:

- (first dot) as is
- (second dot) I had added "viable" before prime soils, and EDC added "and" while I think "or" makes sense
- (third dot) I agree
- (fourth dot) Good suggestion
- (fifth dot) the original language is much better than what EDC is suggesting in my opinion. The onus should not fall entirely on the landowner to provide ALL those benefits, I suggest the County can get involved if they want to add other benefits, but it should not take away from the allowable land use in the proposal if it meets all the other criteria.

It seems to me that conversions are to be highly discouraged but if there comes to be an appealing and allowable change of use then a public benefit is required but to impose all the other benefits on the backs of the landowners, particularly these smaller parcels, seems punitive and almost like a 'take' of private land.

I am also cautious of having development standards that pin down the percentage of open space, parkland, and other requirements for the conversion criterion. Why couldn't this be negotiable depending upon the individual proposals due to site restrictions, roads, and other requirements that may determine where and how much land can be used for a public benefit.

Finally, I think it is important to consider splitting the So Patterson Mesa Specific Plan into two subareas due to the specific differences that Paul Nielsen presenting at the January 26th meeting, and that careful consideration be given to the Overlay proposal presented by the Flats So Patterson landowners.

I think consideration should be given to any proposal put forth by growers, and mentioned in the Plan, as it takes a huge amount of effort and expense on the part of the owners trying to find ways to work with County on their land use issues. We should at least honor that commitment by analyzing and continuing to work with our urban agriculture community.