

1 July 2011

Goleta Valley Planning Advisory Committee (GVPAC)

Valerie Olsen, Chair

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Subject: **Goleta Valley Community Plan Initiation Draft
Agricultural and Rural Land Use
South Patterson Agriculture Flats Subarea**

Chair Olsen and GVPAC Members,

We have reviewed the Goleta Valley Community Plan Initiation Draft dated June 1, 2011 and we remain seriously concerned about the following:

- Policy LUA-EGV-2.7 – Requirements For Flatlands Subarea. This proposed policy restricts the ability to request a general plan amendment.
- The absence of a recommendation to study the request to re-designate a portion of APN 065-230-012 for residential use.
- Action LUA-EGV-2A – Urban Agriculture Land Use Designation and Zoning. We believe that additional types of uses should be considered to be allowed under this proposed designation.

Policy LUA-EGV-2.7 – Requirements For Flatlands Subarea

The Community Plan Initiation Draft requires that any general plan amendment or rezone proposal in the Flats subarea shall only be initiated during a General Plan update or by approval of a Specific Plan.

This policy in the Initiation Draft eliminates the individual property owner's ability to submit a General Plan amendment between General Plan updates. Why should this particular area be burdened with this more onerous obstacle when no other property is treated similar? This requirement forces all property owners in the Sub Area to work simultaneously to develop a Specific Plan. The likelihood of all owners ever being

prepared to move forward with such an expensive and burdensome effort all at once is very low.

We reiterate that this remains unacceptable. This does not afford us the flexibility that was discussed by the GVPAC as a desirable outcome at the beginning of the Community Plan update process. Furthermore, requiring all of us to participate in a Specific Plan may actually result in a complete conversion of the Flatland area when only one or two property owners may be interested in seeking a rezone and general plan amendment.

Of further concern is that to initiate the Specific Plan the following "finding" must be made:

"The Flatlands Subarea is no longer appropriate for urban agricultural land uses following due consideration consistent with this plan."

It is not clear how the "finding" is made or who makes it. We presume it is the Planning Commission that makes this finding upon initiation, but we believe clarification is needed.

This process is significantly more burdensome than the process that exists today, in that a "finding" is not currently required to initiate an amendment and we are currently able to proceed individually without the burden of collectively submitting a costly Specific Plan for the entire area. Again, this does not provide the flexibility that was discussed at the beginning of the Plan update process. We seem to have gone backward during the Plan update process.

We appreciate that it seems the GVPAC has used some of the ideas that we presented in our Overlay Plan concept, in that **Item 7. of Policy LUA-EGV-2.7 – Requirements For Flatlands Subarea** seeks to cluster non-agricultural development on the eastern side of the subarea. *We feel very strongly, as we pointed out in our Overlay Plan, that the northwest portion of the subarea can also reasonably accommodate non-agricultural development. This area is also adjacent to existing roadways, as well as industrial, light industrial and commercial uses, and is in close proximity to Highway 217 and Old Town Goleta.*

Re-designation Request For a Portion of APN 065-230-012

Please recall that during Plan update deliberations, we also requested that the approximately 7 acre "triangle" property (a portion of APN 065-230-012) south of Maria Ygnacio Creek (*separated from the subarea by the creek*) be re-designated or at least studied for re-designation for residential use. The GVPAC has not granted this request, yet, **Policy LUA-EGV-1.3** states the following:

"Atascadero and Maria Ygnacio Creeks shall be maintained appropriately to serve as buffers between agricultural areas, recreational uses and adjacent commercial, industrial, and residential uses."

We believe that our request for a re-designation of this property is directly aligned with this proposed Policy, is completely reasonable, makes sense from a planning perspective, and provides opportunity for residential in-fill development adjacent to existing residential uses. Please reconsider this request.

Action LUA-EGV-2A – Urban Agriculture Land Use Designation and Zoning

We appreciate the GVPAC's intention to incorporate additional uses into the proposed Urban Agricultural Zone. We continue to encourage you to consider a more comprehensive list of uses for the proposed Urban Agriculture Zone that are compatible with the existing, adjacent, non-agricultural uses. As we have stressed previously, this is not a bucolic, rural landscape and this reality cannot be ignored, nor can the realities we face operating in an urban area surrounded by urban development. We are concerned that the "small scale allowable complementary uses" and agri-tourism uses discussed in the Initiation Draft are simply not enough in the subarea and that the feasibility of implementing other types of uses in this urban area is not being considered.



In summary, we appreciate that the difficulties and "barriers" related to agricultural operations in the urban area are being recognized. *But, we feel very strongly that it is unacceptable to remove our individual ability to submit and process General Plan amendments and we believe the request to re-designate a portion of APN 065-230-012 is completely reasonable.*

If you have questions or would like to discuss these matters further please continue to contact us via Suzanne Elledge or Steve Fort with Suzanne Elledge Planning & Permitting Services, Inc. They may be reached at (805) 966-2758, or suzanne@sepps.com and stevef@sepps.com.

Sincerely,

Ron Caird
Stan Giorgi
Eddie Langhorn
Howard Shannon

CC: Jeff Hunt, Office of Long Range Planning
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