



Santa Barbara Audubon Society, Inc.

A Chapter of the National Audubon Society

5679 Hollister Avenue Suite 5B, Goleta, CA 93117

(805) 964-1468

June 9, 2014

Mr. Shine Ling, Associate Planner
City of Goleta
Planning and Environmental Review Department
130 Cremona Drive, Suite B
Goleta, CA 93117
(805) 961-7540

sling@cityofgoleta.org

RE: SBAS Comment Letter to Shelby Residential Project DEIR--April 2014: Case No. 05-154-OA, -RZ, -VTM, -DP State Clearinghouse #2012081019

Dear Mr. Ling,

Founded in 1963, the Santa Barbara Audubon Society (SBAS) is a chapter of the National Audubon Society with approximately 1100 members in on the South Coast of Santa Barbara County. Our mission is to help conserve and restore the natural ecosystems and biological diversity of the Santa Barbara area, and to connect people with birds and nature through education, science-based projects, and advocacy.

The proposed Shelby Residential Project is located in the foothill area of Goleta and has been historically more rural-agrarian than suburban land use that complies with the fundamental principles of the Goleta General Plan. This proposed project requires a request for a general plan amendment and rezone to apply appropriate land use designations and zone districts for a proposed residential development, as well as moving the urban boundary line that the applicant has submitted as a supplemental DEIR.

SBAS strongly recommends that the City of Goleta deny this amendment request to the General Plan. The General Plan currently acknowledges and supports the intended land use and should not be rewritten to accommodate developers and short-term gain. The project site is currently zoned AG-II-40. The purpose of this zone district is to establish agricultural land use for prime and non-prime agricultural lands located outside of urban, inner rural, and rural neighborhood areas. The intent of this zone district is to preserve these lands for long-term agricultural use. The proposed Shelby development project would not be consistent with the purpose and intent of this zone district. Adding a subdivision of 60 homes to this rural agricultural property would represent a substantial urban encroachment, permanent loss of beautiful unobstructed mountain views, habitat destruction and introduce Class I impacts of noise, light glare, traffic congestion, overburdening of city services—fire and police protection, water and sewerage. The project description does not include sufficient justification for converting an agricultural parcel to urban residential uses, contrary to the spirit of Measure G, regardless whether Measure G technically applies. We recommend that this parcel remain as open space as it



Santa Barbara Audubon Society, Inc.

A Chapter of the National Audubon Society

5679 Hollister Avenue Suite 5B, Goleta, CA 93117

(805) 964-1468

is currently designated on the City's Open Space Plan Map.

Most importantly, conversion of this agricultural parcel to residential will irreparably impact the wildlife and riparian corridor at El Encanto Creek that borders the proposed development parcel. This area is designated as an Environmentally Sensitive Habitat Area (ESHA) that requires a 100-foot setback for development from the Streamside Protection Area (SPA) that the Shelby project proposal does not take into consideration at all. The perennial nature of the El Encanto Creek makes it an important environmental resource in Goleta as are the headwaters and source of this creek that can be found a short distance uphill from the Shelby parcel. The El Encanto Creek flows directly to the Devereux Watershed and to compromise or cut off that source would be devastating to this valuable local ecosystem and all the wildlife it supports. The cumulative and growth-induced impact of this project will also have an exponential ripple effect on subsequent development caused by amending the General Plan.

The General Plan calls for a balance of residential, commercial and agricultural land uses and already provides for enough residentially zoned vacant parcels to meet and exceed the Regional Housing Needs Allocation (RHNA) units mandated for the present RHNA cycle and for the foreseeable future.

SBAS supports the City of Goleta in denying the Shelby Residential Project Proposal and its supplemental Shelby Trust General Plan Amendment applications and DEIR. Allowing conversion of agricultural land that has been designated as "prime and unique farmland" should not be permitted. Because the land is not in current agricultural usage does not mean it cannot continue to be used as agricultural. Once it's paved over, you can't get it back—it is gone forever. With the instability and unpredictability of climate change and sea level rise, the City needs to preserve all the open space it has because we will need upland areas for retreat and for wildlife refuge. In addition, conversion of this parcel to urban use has the potential to cause increased flooding downstream and increased run-off in increasingly unstable weather patterns caused by climate change.

Thank you for considering our comments. We sincerely hope that you will deny this project.

Steve Ferry, Co-President
Santa Barbara Audubon Society

Nancy Keltner

Nancy Keltner, Conservation Chair
Santa Barbara Audubon Society