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## 4.2 AGRICULTURAL RESOURCES

This section describes the project site's existing agricultural operations and the impacts of the proposed project on agricultural viability. This analysis was based on a Rangeland Assessment prepared by Orrin Sage (**Appendix B**) as well as site investigations from County staff, review of crop and production reports on file with the County Agricultural Commissioner's Office, utilization of the agricultural suitability points assessment detailed in the County's *Environmental Thresholds and Guidelines Manual* (**Appendix C**), and discussion with the ranch manager.

### 4.2.1 ENVIRONMENTAL SETTING

#### 4.2.1.1 Existing Site Conditions

The ranch consists of 1,802 acres (1,784 acres of which are included as part of the project) located in the rural unincorporated Gaviota Coast area of Santa Barbara County, approximately four miles west of the City of Goleta and the urban/rural boundary. Existing agricultural uses within the project site include cattle ranching and avocado and lemon orchards, as well as multiple agricultural support facilities (barns, pens, reservoirs, and equipment storage) and a number of agricultural employee dwellings (four total – see **Table 1.6-1** for more details), which are proposed to remain. The property has a Comprehensive Plan designation of Agriculture (A-II-100) and has been in various forms of agriculture and cattle ranching since the ranch was established in the eighteenth century as a part one of Mission Santa Barbara's original five royal *ranchos*.

The existing ranch, including the 18-acre lot that is not a part of the project, consists of 10 lots ranging in size from 1.27 to 740 acres. Despite the existing parcel lines, the ranch has been managed as a single agricultural operation since 1967, when the current owner purchased the ranch, with established farming practices, cattle fencing, access roads, and annual grazing patterns covering much of the ranch. According to the California Department of Conservation's Important Farmland 2006 maps, the majority of the ranch, 83%, is designated as Grazing Land and 12% is designated as Prime Farmland, Unique Farmland, and Farmland of Statewide Importance (see **Figure 4.2-1**). Land located south of U.S. Highway 101 is characterized by some productive soils and relatively flat, gently sloping terrain with 2% to 15% slopes. In contrast, soils north of the highway are less productive and 15% to 75% slopes dominate the landscape. Twenty six soil types and six different irrigated land capability classifications are present throughout the ranch. The most common is Gaviota sandy loam (339 acres), a non-prime Class VII soil type. Approximately 165 acres (9%) of the soils on the ranch (157 acres within the project site) are prime and most of these are currently in cultivation. The majority of the 198 acres of orchards is planted north of the 101 freeway and is comprised of approximately 127 acres of avocados. Approximately 71 acres of avocados and lemons are currently in production in between the highway and the Union Pacific Railroad. Average annual yield for the orchard is 1.4 million pounds of fruit totaling \$1.1 million (pers. comm., Paul Van Leer, Ranch Manger). There is no cultivated agriculture in between the railroad and Pacific Ocean.

Approximately 649 acres of rangeland within the entire ranch support a current cattle grazing operation consisting of approximately 60 cow-calf pairs, 10 replacement heifers, four bulls, and

seven horses. This equates to approximately 86 animal units per year, which exceeds the estimated carrying capacity of the ranch of 42 AU/year due to supplemental feeding (one animal unit by definition is 1,000 pounds of grazing animal; SAGE 2008). Supplemental feeding is implemented on the ranch for overall herd management and new calf health by providing high quality forage to the cows following calving during the early lactation period, not because the cattle would otherwise over-graze or go hungry due to inadequate natural feed on the ranch (pers. comm. Paul Van Leer, Ranch Manager, 2011). Existing structural development totals 25,805 square feet and includes one main residence, two rental units, one vacant unit, four farm employee dwellings, four sheds, two barns, two garages, and one shop.

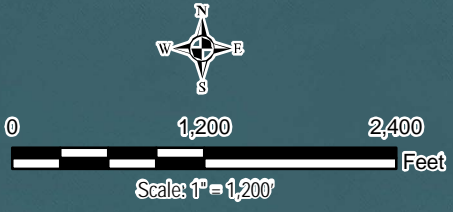
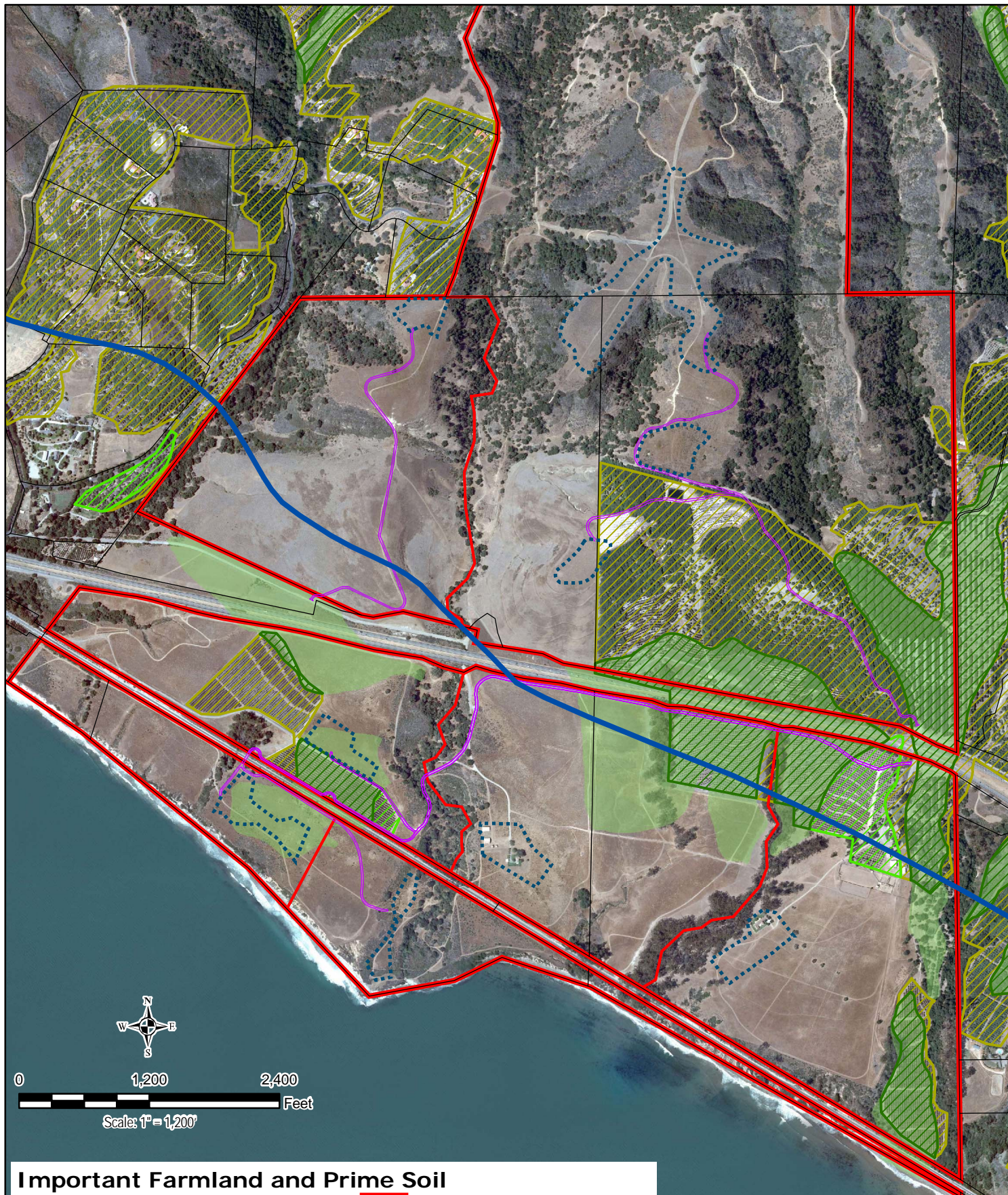
The ranch is bisected by U.S. Highway 101 and also by the Union Pacific Railroad. U.S. Highway 101 travels the toe of the coastal foothills above the coastal terrace through the project site and the Union Pacific Railroad hugs the coast in between Las Varas Creek and Gato Creek and bisects the coastal terrace west of Gato Creek. Vehicle and livestock access culverts are utilized by the ranch under both the highway and railroad to allow for movement of cattle throughout the ranch.

There are no lands within the project boundaries that are under Williamson Act contracts (i.e. Agricultural Preserve Program).

Approximately 198 acres of lemons and avocados are currently in active production, with the largest acreage located within existing Parcel G. In addition, approximately 631 acres within the portion of the ranch encompassed by the project are suitable and utilized as grazing land to support the cattle operation (an additional 18 acres that are proposed to be “not a part” of the project are also suitable and utilized for grazing within the ranch as a whole). **Table 4.2-1** provides a summary of the agricultural production and cattle grazing areas by parcel.

**Table 4.2-1 Existing Agricultural Production by Parcel**

Existing Parcel	Parcel Size	Acres in Production	Acres in Grazing
A	11.08	0	0
B	94.25	0	78
C	8.35	0	6
D	239.53	51	115
E	165.21	20	123
F	740.09	0	136
G	281.35	127	28
H	242.3	0	144
I	1.27	0	1
<b>Total</b>	<b>1,783.43</b>	<b>198</b>	<b>631</b>



**Important Farmland and Prime Soil**

Prime Farmlands	Project Extent
Farmlands of Statewide Importance	Existing Lot Line
Unique Farmlands	Proposed Lot
Prime Soil	Proposed Development Envelope
	Proposed Access Road
	State of CA Coastal Zone Boundary

Sources: Calif. Dept. of Conservation (2008);  
U.S. Dept. of Agriculture (2007)

Image Source: Air Photo Mosaic taken August 2008 by AirPhotoUSA

**Figure  
4.2-1**

The Rangeland Assessment (Sage 2008) concluded that the existing parcels are not viable as standalone parcels with respect to cattle grazing operations, as their rangeland carrying capacities are below the threshold of 25 to 30 animal units per year (AU/yr) suggested by the Santa Barbara County Cattlemen's Association as indicative of a viable cattle operation.

### 4.2.1.2 Surrounding Land Uses

As reported in the Gaviota Coast Feasibility Study and Environmental Assessment (NPS, 2004), the Gaviota Coast contains elements of the historic ranching patterns established by the Spanish and Mexicans during the Mission (1760-1820) and Rancho Periods (1820-1845) and continued into the Americanization Period (1880-1915). Much of this pastoral setting has remained intact due to the stewardship of private and public landowners. Land uses in the immediate vicinity of the project site are dominated by agriculture (both ranching and orchard operations), undeveloped vacant land, rural low intensity residential uses, and public and private recreational facilities and open space. The project site is bounded to the north by Los Padres National Forest, to the south by the Pacific Ocean, to the east by existing orchards and other active agriculture and undeveloped land, and to the west by orchards, limited rural residential uses, and a horse breeding and polo training operation (Zacara Ranch, formerly El Capitan Ranch). The recreational areas of El Capitan State Beach and the private El Capitan Campground are located further west of the site. The Naples Township and associated Santa Barbara Ranch residential estate development project and agricultural lands are located one mile east of the site. Some of the agricultural properties immediately east and west of the project site are currently under Williamson Act contracts, which restricts the level of non-agricultural development and ensures that lands are maintained in agricultural production or grazing operations.

Surrounding residential development is primarily rural in character and modest in size and scale, though several residences in the El Capitan Ranch subdivision immediately west of the project site and north of U.S. Highway 101 are characterized as more estate-like. However, these residences are surrounded by productive orchards, consistent with the rural agricultural character of the area. As indicated in **Figures 4.9-1** and **4.9-2**, land in the vicinity of the project site has a land use and zoning designation of agriculture.

## 4.2.2 REGULATORY FRAMEWORK

### 4.2.2.1 State Agencies and Requirements

#### California Department of Conservation

The California Department of Conservation administers the State Important Farmland Mapping Program and California Land Conservation Act (Williamson Act). The Important Farmland Mapping Program compiles information on the state's important farmlands, including tracking farmland conversion, and provides this information to state and local agencies for use in planning and decision making. The project site is not enrolled in a Williamson Act contract and therefore this program does not apply to the project.

### California Coastal Commission

The California Coastal Commission (CCC) has authority over certain types of land use and development within the coastal zone through administration of the California Coastal Act. The Coastal Act contains specific policies which address the preservation of agricultural land and the protection of such land from non-agricultural conversion.

***Coastal Act Policy 30241:*** *The maximum amount of prime agricultural land shall be maintained in agricultural production to assure the protection of the areas' agricultural economy, and conflicts shall be minimized between agricultural and urban land uses through all of the following:*

*(d) By developing available lands not suited for agriculture prior to the conversion of agricultural lands.*

*(f) By assuring that all divisions of prime agricultural lands, except those conversions approved pursuant to subdivision (b) of this section, and all development adjacent to prime agricultural lands shall not diminish the productivity of such prime agricultural lands.*

***Coastal Act Policy 30242:*** *All other lands suitable for agricultural use shall not be converted to nonagricultural uses unless: (1) continued or renewed agricultural use is not feasible, or (2) such conversion would preserve prime agricultural land or concentrate development consistent with Section 30250. Any such permitted conversion shall be compatible with continued agricultural use on surrounding lands.*

***Coastal Act Policy 30250(a):*** *New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulative, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels.*

#### **4.2.2.2 Local Regulations and Policies**

##### Applicable County Policies

A number of County planning documents contain policies and provisions designed to protect agricultural resources and agricultural land from premature conversion to non-agricultural uses. The County *Coastal Land Use Plan* (CLUP) implements the policies of the Coastal Act in the coastal zone and includes several policies related to agricultural protection. The County's General Plan, including the Agricultural Element and Land Use Element, also contains policies related to agricultural protection within the coastal and inland portions of the County. Relevant policies are presented below:

***CLUP Policy 8-2:*** *If a parcel is designated for agricultural use and is located in a rural area not contiguous with the urban/rural boundary, conversion to nonagricultural use shall not be permitted unless such conversion of the entire parcel would allow for another priority use under the Coastal Act (e.g. coastal dependent industry, recreation and access, or protection of an environmentally sensitive*

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habitat). Such conversion shall not be in conflict with contiguous agricultural operations in the area, and shall be consistent with Sections 30241 and 30242 of the California Coastal Act.

**CLUP Policy 8-4:** As a requirement for approval of any proposed land division of agricultural land designated as Agriculture I or II in the land use plan, the County shall make a finding that the long-term agricultural productivity of the property will not be diminished by the proposed division.

**Agricultural Element Policy IA:** The integrity of agricultural operations shall not be violated by recreational or other non-compatible uses. Imposition of any condition requiring an offer of dedication of a recreational trail or other recreational easement shall be discretionary (determined on a case-by-case basis), and in exercising its discretion, the County shall consider the impact of such an easement upon agricultural production of all lands affected by and adjacent to said trail.

**Agricultural Element 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.

**Agricultural Element Goal III:** Where it is necessary for agricultural lands to be converted to other uses, this use shall not interfere with remaining agricultural operations.

**Land Use Element Regional Goal, Agriculture:** In the 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.

### Santa Barbara County Agricultural Commissioner's Office

The County Agricultural Commissioner's Office regulates the purchase and application of pesticides on agricultural lands within the County, in compliance with the California Code of Regulations sections 6600 and 6614. The Office issues pesticide use permits, conditions permits, conducts inspections, responds to and investigates pesticide complaints, and issues notice of violations or fines for improper pesticide use in order to ensure agricultural chemicals are applied in accordance with product label requirements.

### 4.2.3 THRESHOLDS OF SIGNIFICANCE

Appendix G of the CEQA Guidelines provides the following guidance for determining whether a project would have a significant effect on agricultural resources. Per the guidelines, a project may have a potentially significant impact if it would:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.
- Conflict with existing zoning for agricultural use, or a Williamson Act contract.
- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use.

In addition, the County's Initial Study checklist includes the following questions to help determine the significance of an impact on agricultural resources:

- Will the project convert prime agricultural land to non-agricultural use, impair agricultural land productivity (whether prime or non-prime), or conflict with agricultural preserve programs; or
- Will the project have an effect upon any unique or other farmland of State or Local Importance.

County methodology for assessing the agricultural viability of a property focuses on nine criteria that are weighed on a numeric scale (*Santa Barbara County Environmental Thresholds & Guidelines Manual*). These criteria include parcel size, soil classification, adjacent land uses, water availability, existing land use, agricultural suitability, combined farming operations, comprehensive plan designation, and agricultural preserve potential. The existing viability of the site is determined, and then compared to the viability of the proposed project. If the results of the assessments suggest that an existing agriculturally viable property would be substantially impaired or rendered non-viable by the project, the impact is considered potentially significant and is evaluated further in the context of an EIR.

#### 4.2.4 PROJECT IMPACTS AND MITIGATION

##### **Impact AG-1: Direct Effects on Agricultural Operations and Productivity**

The ranch was analyzed for its agricultural viability using the agricultural points assessment system outlined in the County's *Environmental Thresholds and Guidelines Manual*. The points assessment system is not definitive, but rather is one tool that provides an indication as to the relative viability or suitability of a property. 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. The analysis evaluated the existing ranch as a single unit, since that is how it currently operates, as well as each parcel on an individual parcel basis. This assessment is included in Appendix C of the EIR and the results are summarized below. Generally speaking, a site or parcel that scores 60 points or more is considered agriculturally suitable and productive. The points assessment concluded that the existing ranch as a whole is viable (83 points). In addition, existing lots D, E, F, G, and H are viable (76, 70, 65, 71, and 62 points, respectively) as standalone parcels, while existing lots A, B, C, and I (those sandwiched in between the railroad and Pacific Ocean and a small parcel north of the highway) are not viable (43, 54, 41, and 45 points, respectively) as standalone parcels.

The project involves reconfiguration of existing lots within Las Varas Ranch, identification of residential development envelopes within each of the newly configured parcels, and construction of various site improvements to serve future development, including a water distribution system and access roads. The residential development envelopes would range in size between 2.5 and 5 acres on each lot, however, actual non-agricultural structural development would be limited to two contiguous acres within each envelope, thereby limiting the amount of land that would become unavailable for agricultural uses to approximately 14 acres site wide (with additional area for access corridors leading to and from the development areas, though these mostly follow existing ranch roads that are already not available for grazing or orchards). In applying the points assessment to the ranch assuming implementation of the proposed project, the viability of the ranch as a whole is unchanged. The parcels in between the railroad and the Pacific Ocean remain below the viability threshold, with points totaling 52 and 53 for Parcels 1 and 2, respectively. The parcels in between the railroad and U.S. Highway 101

remain above the viability threshold, with points totaling 68, 72, and 73 for Parcels 3, 4, and 5, respectively. Lastly, the two parcels north of the highway remain viable with reconfiguration of the parcels and proposed development, with points totaling 79 and 60 for parcels 6 and 7, respectively. Thus, based on application of the agricultural points assessment, the proposed project would not significantly impair the potential agricultural suitability and productivity of the ranch. Impacts in this regard would be *less than significant (Class III)*.

None of the development envelopes contain land that is currently in active agricultural production or land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, with the exception of a small corner of proposed building area #1 (6a) on proposed Parcel 6, which is designated as Unique Farmland. However, the development envelope areas do contribute towards the ongoing cattle grazing operation within the ranch. The Rangeland Assessment prepared for the project (SAGE 2008, **Appendix B**) concluded that the existing ranch has a carrying capacity of approximately 42 animal units, which exceeds the 25 to 30 animal unit threshold identified by the Santa Barbara Cattleman's Association as representing a viable ranching operation. However, the report concluded that none of the individual parcels, either in their current or proposed configuration, are viable as standalone lots. The assessment further concluded that the proposed project and withdrawal of up to 32.5 acres out of suitable grazing land (assuming the full extent of the residential development envelopes and associated infrastructure improvement areas would become unavailable for grazing purposes) would reduce the carrying capacity by approximately 2 animal units per year, such that the ranch as a whole would remain viable. The area within each development envelope that can be used for non-agricultural development, including residential fencing and landscaping, has been limited to two contiguous acres subsequent to preparation of the report, further reducing the amount of land potentially removed from suitable grazing land. In addition, portions of two of the proposed envelopes are already occupied by existing residential development such that any future development in those envelopes would not significantly alter the existing condition. The location of the envelopes would continue to allow for cattle movement and the use of livestock water sources throughout the ranch. Since only a small portion of currently productive land would be taken directly out of agricultural production in the event building area #1 (6a) on Parcel 6 is selected, and the grazing operation would remain viable, direct impacts to agricultural resources from the conversion of farmland to non-agricultural uses would be *less than significant (Class III)*.

### **Mitigation Measures**

Impacts would be less than significant and no mitigation is required.

### **Residual Impacts**

The residual effect of Impact AG-1 is **less than significant (Class III)**.

### **Impact AG-2: Indirect Impairment of Agricultural Operations and Productivity**

The proposed project would facilitate the development of up to seven residential home sites within the ranch (two of which are currently developed but could be expanded in the future) and would provide opportunities for public recreation within the ranch in the form of two dedicated trails easements (one vertical trail easement for beach access from U.S. Highway 101

along the eastern edge of the ranch and one lateral trail easement for connection with the California Coastal Trail paralleling the highway on its north side). These two elements of the project have the potential to indirectly impair existing agricultural operations within and adjacent to the ranch, as discussed below.

Public use of the trails within the ranch, especially the portions of the trails adjacent to productive avocado orchards, carries with it the possibility for trespass into the adjacent agricultural areas. The project would include dedication of an easement to the County for a future 30-space public parking area off U.S. Highway 101 for use by the public in accessing the trail to the beach. As the trail would offer established access to a scenic rural coastline and a notable surf break, Edward's Point, it is expected that the parking area and trail would experience periods of ~~relatively heavy~~ moderate use. The vertical beach access ~~trial-trail~~ would run alongside the existing orchards ~~within approximately 10 feet of the~~ (primarily sited in between the planted orchard and Las Varas Creek on the eastern edge of the property) for a length of approximately 0.7 miles. For the lateral trail on the north side of the highway, the trail would run for approximately 0.6 miles adjacent to the avocado orchard (within approximately 15 feet of the orchard edge) and then an additional 0.9 miles alongside a portion of the ranch used for cattle grazing. Illegal trespass into the adjacent orchard areas could result in theft or vandalism of the orchard and farming equipment, injury or damage to the trees, and potential increased personal injury liability to the agricultural landowners due to injury during trespass. Similarly, unleashed dogs could potentially harass cattle or be exposed to agricultural chemicals or fertilizers if wandering off the trails. Absent measures to inhibit or deter such trespass and associated activities, public recreation within the site could result in impairment of the existing agricultural operation. To this end, the project includes installation of fencing along the orchard or grazing side of both the vertical beach access and lateral coastal trail north of the highways. The fence is proposed to be approximately six feet high and constructed out of a chain link material. The provision of this fencing is expected to effectively deter trespass into the adjacent agricultural areas, thereby minimizing impacts associated with public use of the trails. ~~Further, installation of the fencing would not impinge upon the agricultural operation or result in the loss of any orchard trees.~~ In addition, establishment of these trails would likely help to alleviate impacts to the ranch from ongoing unauthorized access through the ranch to reach Edwards Point. Surfers who currently access the point through unauthorized means can cause damage to agricultural fencing by stretching it, cutting it, or climbing over it, and also have the potential to disturb or harass cattle that are grazing on the coastal bluff parcels. According to the ranch manager, fences have been cut along the railroad tracks during high surf events requiring ranch staff to monitor the fence twice per day when cattle are grazing and present in the vicinity. In addition, the ranch has lost calves which have gone over the cliff during high surf events. Calves generally stay with their mother unless startled or disturbed, so these events are suspected to be related to disturbance from unauthorized access, though this has not been proven (pers. comm., Paul Van Leer, Ranch Manager, 2011). Overall, ~~impacts are therefore~~ considered *less than significant*.

In addition, the application of agricultural pesticides (e.g. insecticides, herbicides, fungicides, etc.) in close proximity to public trails could result in unintended exposure of the public to said chemicals if not applied appropriately or access not adequately controlled (see Section 4.8 for further discussion). This could result in a conflict between uses that could impair agricultural activities on the ranch and result in increased liability to the ranch. However, 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 will minimize any potential for pesticide drift or inadvertent exposure. Impacts related to unintentional exposure to the public are therefore considered *less than significant*. Nonetheless, in order to mitigate unintended consequences of public use of the trails on the agricultural operation, minimize liability to the ranch, and minimize conflict, periodic closures of the trails during ~~aerial~~ pesticide spraying are recommended.

Under the proposed project, suitable areas outside of the seven residential development envelopes would remain available for conjunctive use by the ranch's cattle operation, as the cattle are rotated through the various areas of the ranch throughout the year. In addition, the existing orchards would remain in production, though the crop types could change over time. The development of residential units in such close proximity to active agricultural areas could create conflicts between the two uses, as the common nuisances associated with agriculture (e.g. dust, odor, pesticide application, etc.) could be experienced as objectionable by the residents. It is expected that individual landowners purchasing lots and developing residences within the ranch would be well aware of the ongoing agricultural activities, a feature that in all likelihood attracts many of the landowners to the site. However, landowners must be made aware of the ongoing agricultural operations within the ranch in order to avoid conflicts in the future, especially since the orchards within the individual lots would potentially be managed independently by each respective landowner. The existing agricultural uses are, and would continue to be, protected by the County's Right to Farm Ordinance. The Ordinance defines "nuisance" under general law to not include effects such as dust, noise, lights, odors, etc. from ongoing agricultural operations. It essentially establishes a buyer beware program, where landowners moving into an agricultural area are made aware of the ongoing agricultural activities and purchase the property with an understanding of the impacts of living next to an active agricultural operation. Agricultural operations are further protected by a recent California Law enacted on January 1, 2009. Entitled the "Right To Farm Real Estate Disclosure Notice," this law requires that land sellers and agents must disclose whether a listed for-sale property is located within one mile of a parcel designated as Important Farmland. Any of the five agricultural categories qualifies for disclosure purposes, including Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land. The notice, which is included with the other disclosures common for a land transfer (e.g. natural hazards disclosure) prior to the close of escrow, advises potential buyers of the potential presence of active agricultural operations in close proximity and the nuisances that are common with such operations (e.g. noise, odors, dust, pesticide application, etc.).

While the County's Right to Farm Ordinance protects agriculturists from nuisance lawsuits and the State's Right to Farm Real Estate Disclosure Notice ensures potential landowners are fully aware of surrounding agricultural activities prior to purchasing a property in an agricultural area, an unintended consequence of residential development adjacent to agricultural areas is that the overall effect of these conflicts can be the modification of agricultural practices which can affect productivity. For example, altering the manner or frequency in which pesticides are applied due to the presence and proximity of residential development. For these reasons, impacts are considered *potentially significant but mitigable*.

Domestic animals, especially dogs, belonging to future residents, have the potential to harass cattle if not properly controlled. However, it is not expected that the proposed level of residential development and associated domestic pets (i.e. seven lots within 1,784 acres) would

significantly impair the cattle operation and there would be certain measures to separate the cattle operation from residential development such as fences. Impacts in this regard are considered *less than significant*.

There is also the possibility that future landowners within the ranch may not want to continue to participate in the collective ranching operation or maintain the productivity of the existing orchards. The proposed project could fragment the ownership of the Ranch into separately owned lots or break up the contiguity of production areas or grazing areas which could in turn reduce the feasibility and likelihood that the property would continue to be used for agricultural purposes in the long-term. However, the applicant is committed to maintaining its existing agricultural operations and intends to record CC&Rs for the ranch that would require individual landowners to participate in the ranching operation and maintain productive agriculture. Nonetheless, prior to the preparation and recordation of the CC&Rs it is impossible to verify that they would achieve the desired intent; impacts are thus considered *potentially significant but mitigable*.

The proposed project is not expected to result in any adverse impacts to neighboring agricultural operations. With the exception of proposed Parcel 7, the proposed residential development envelopes are not located in close proximity to any adjacent off-site cultivated areas. The proposed trail alignment for the vertical beach access would be separated from the neighboring orchard operation to the east by Las Varas Creek and dense riparian vegetation. The Right to Farm Ordinance would ensure that future residential development on proposed Parcel 7 would not impair the agricultural operations on neighboring properties. Impacts to adjacent agricultural operations are therefore considered *less than significant*.

Overall, indirect impacts on agricultural resources are *potentially significant and mitigable* for the reasons described above.

### Mitigation Measures

#### *Recommended Mitigation*

**AG 2-1: Controlled Access.** To protect the liability of the ranch's agricultural operations, public access within the trails shall be restricted on days when ~~aerial~~ a pesticide application (aerial or ground-based) is being conducted until the treated area is safe to re-enter, when orchards or trees are being pruned adjacent to the trails, or when other activities that may endanger the public or pose a potential conflict are being conducted adjacent to or in close proximity to the trails. The applicant/landowner shall notify the County Parks Department and post a notice at the trails' public control points within the ranch at least 48 hours in advance of closures. In addition, permanent signs shall be placed at the trails' public control points within the ranch identifying the agricultural practices and the issues associated with being present adjacent to an active agricultural area, as well as educating trail users on proper trail etiquette and directing them to the right locations. **Plan Requirements and Timing:** A copy of the sign shall be reviewed and approved by P&D and Parks Department prior to zoning clearance for site improvements. The signs shall be installed prior to opening of the trails for public access.

**MONITORING:** P&D shall site inspect and document installation prior to opening the trails for public access.

**Required Mitigation**

**AG 2-2: Buyer Notification Program.** The following buyer notification shall be recorded on a separate information sheet with the final map and lot line adjustment or deed accompanying the sale of each lot:

**Important: Buyer Notification**

*This property is zoned agriculture and is located in an area that is in active agriculture. The County of Santa Barbara has determined that it is in the public interest to preserve agricultural land and operations within the County and to specifically protect these lands for continued agricultural use. Through enactment of an ordinance adding Section 3-23, Article V to Chapter 3 of the County Code, any inconvenience or discomfort from properly conducted agricultural operations, including but not limited to noise, odors, dust, and chemicals, will not be deemed a nuisance. Landowners within or adjacent to agricultural operations shall be prepared to accept such problems as the natural result of living in or near agricultural areas.*

**Plan Requirements and Timing:** The notification shall be recorded with the final map and lot line adjustments and incorporated into the CC&Rs recorded for each lot. This shall occur prior to final map clearance and issuance of any CDP or LUP for any new residence within the Ranch. The CC&Rs shall be recorded prior to or concurrent with the sale of the first new lot within the Ranch.

**MONITORING:** P&D shall ensure the notification is included in the recorded map or line lot adjustment, prior to final map clearance. P&D shall review the CC&R document prior to issuance of any CDP or LUP for any new residence within the Ranch.

**AG 2-3: CC&Rs.** The project CC&Rs shall address continued agricultural use of the ranch. The CC&Rs shall, at a minimum, address the following agricultural issues:

- Establishment of residential development envelopes, with the requirement that all residential buildings and non-agricultural structures be located within the development envelopes (except provisions for water storage tanks for fire protection purposes and other permitted infrastructure improvements);
- No conversion of existing orchards to a non-agricultural use and conversion of existing orchards to grazing land shall be minimized, though crop types may be changed; any necessary buffers between orchards and residential and non-agricultural development must be contained within the residential development envelopes;
- No impingement of existing cattle grazing operation by non-agricultural uses; ~~restrict the installation of perimeter-fencing~~ outside of the 2-acre areas selected by each owner for residential development within each development envelope

shall not interfere with the ongoing agricultural operation and shall to ensure continued use of common grazing lands;

- Provide cooperative management structure through identification of an HOA;
- Establishment of standards for production of commercial agriculture and best management practices in the orchard areas.

**Plan Requirements and Timing:** The CC&Rs shall be prepared by the applicant and approved by P&D prior to Final Map Clearances. CC&Rs shall be recorded concurrent with the Final Map Clearances recording of the final maps/lot line adjustments. These provisions of the CC&Rs shall remain in place for a minimum of 50 years or so long as the CC&Rs remain in effect, whichever is longer.

**MONITORING:** P&D shall review the CC&R document prior to Final Map Clearance.

### Residual Impacts

With implementation of the above mitigation measures, the residual impact of AG-1 is reduced to **less than significant (Class II)**.

### **Impact AG-3: Effects on Long-term Viability**

Many of the surrounding agricultural properties participate in the County's Agricultural Preserve Program and are under Williamson Act contracts. These contracts provide for reduced property taxes in exchange for continued dedication to agricultural production (both crop production and cattle operations). In Santa Barbara County and throughout the state, this program is successful in ensuring the long-term viability of agricultural operations and preventing the premature conversion to urban or other non-agricultural uses or development. While Las Varas Ranch is not currently under a Williamson Act contract, the ranch as a whole and five of its existing parcels individually are eligible for such contract(s) based on their size, water availability, and extent of current agricultural operations. It is important that the property remain eligible to participate in the Agricultural Preserve Program (APP) in the future, so that a Williamson Act contract is available in the event that it becomes a necessary tool for the agricultural operation to remain economically viable in the long term.

The reconfiguration of the parcels being proposed as part of the project would not preclude the property from remaining eligible for participation in the APP, as the ranch as a whole and five of the seven parcels (Parcels 3 through 7) would continue to be eligible on the basis of acreage (i.e. 100 acres or greater in parcel size for nonprime contracts). Proposed Parcels 1 and 2 would not be eligible as they are below the minimum acreage for nonprime contracts and would not qualify for prime contracts since they are not currently engaged in commercial agricultural production and have low crop suitability due to parcel configuration and soil type. The proposed development envelopes within those five eligible parcels would accommodate a level of non-agricultural development that would exceed that which is allowed under the County's Agricultural Preserve Program, as outlined in the County's *Uniform Rules for Agricultural Preserves and Farmland Security Zones* (Uniform Rules). The Uniform Rules establishes a limit of up to 2 acres or 3% of the parcel, whichever is less, for non-agricultural development including

a principal residence, all accessory structures, landscaping, and non-agricultural access roads serving the residence. However, the project proposes to limit future non-agricultural development, including residential fencing and landscaping, to two contiguous acres within each development envelope in order to be consistent with the Uniform Rules. This will help to limit the potential for the proposed project and future residential development on the ranch to result in the respective parcels losing their eligibility for enrollment in a Williamson Act contract. Impacts on the long-term viability of the ranch in terms of continued eligibility for the APP are therefore considered *adverse but less than significant (Class III)*.

### Mitigation Measures

No mitigation is necessary.

### Residual Impact

The residual impact on the long-term viability of agriculture within the project site as it relates to eligibility under the County's Agricultural Preserve Program is **less than significant (Class III)** due to the limitation on the extent of future non-agricultural development within each development envelope.

## 4.2.5 CUMULATIVE IMPACTS

Like project-specific impacts, cumulative effects on agriculture are primarily associated with three different factors: 1) direct cumulative conversion of agricultural land to a non-agricultural use; 2); fragmentation or subdivision of agricultural land into parcels that are not of sufficient size to support a viable agricultural operation; and 3) indirect impacts and land use conflicts resulting from the introduction of non-agricultural uses and activities into an agricultural area.

In combination with other planned, pending, and recently approved projects in the vicinity of the project site, the proposed project would result in the incremental introduction of residential development onto agricultural lands. A majority of the related pending and recently approved projects are single family residences on existing parcels with an agricultural land use designation.

New residential development associated with these projects (including the proposed project and the identification of building envelopes for future development) totals ~~143~~117 residential units (assuming implementation of the Santa Barbara Ranch Alternative 1 project totaling 72 units; the MOU project consists of 18 fewer units). The majority of these residences would be within or east of the Naples Townsite. However, single family residences are principally permitted uses within agriculturally-zoned properties and the act of developing a single family residence on rural agricultural land does not, in and of itself, necessarily result in a significant physical impact on the agricultural productivity or viability of the site or surrounding lands. With the exception of the Santa Barbara Ranch Alternative 1 project within the Naples Townsite and potentially the Tecolote Preserve project surrounding the Embarcadero subdivision<sup>1</sup>, none of the planned or pending projects remove land that is currently in active agricultural production or designated as Prime Farmland, Farmland of Statewide Importance, or Unique

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<sup>1</sup> Specific details on the Tecolote Preserve project have not been developed as of the date of this EIR.

Farmland, and convert it to a non-agricultural use. Similarly, few of the projects would result in individual lots that were once agriculturally viable no longer remaining viable as a result of development of a single family residence.

The cumulative projects would add incrementally to the loss of prime soils and undeveloped land otherwise available for agriculture along this section of the Gaviota Coast. The proposed project would convert up to approximately ~~18~~16 acres out of potential agriculture for residential development and infrastructure improvements, which includes ~~(~~14 acres for residential development and additional acreage for the shared water system and new access roads, and other infrastructure improvements) over the 1,784-acre ranch, equating to less than 2% of the entire project site. Only approximately seven acres of this area would be composed of prime soils, within proposed Parcels 1 and 3. The existing lots in their current configuration could be developed with residences, resulting in similar impacts to the proposed project, as discussed in the No Project Alternative. The related projects would similarly result in the loss of approximately 188 acres of lands otherwise available for agriculture to non-agricultural uses (assuming up to 2 acres of non-agricultural use per project). However, such a loss would not significantly affect the area's continued agricultural production capabilities, as it would account for less than one percent of the total land area (outside of Los Padres National Forest boundaries) along the Gaviota Coast in between the City of Goleta and Gaviota State Park.

Subdivision and/or fragmentation of contiguous agricultural areas could result in cumulative impacts to the long-term viability of agricultural operations within the Gaviota Planning area by breaking up agricultural lands into individual properties or ownerships that are too small to remain viable on their own. However, current zoning and land use designations in the vicinity of the project site as indicated in **Figures 4.9-1** and **4.9-2**, including the project site itself, provide a certain level of protection against systematic fragmentation of large ranches into small, non-viable landholdings. As indicated in the figure, most surrounding zoning has minimum parcel sizes of 100 or 320 acres. ~~With the exception of the planned Teolote Preserve project just west of the City of Goleta, which involves the subdivision of an existing ranch into smaller individual home sites with a common agricultural operation, n~~None of the related projects involve subdividing existing agricultural land into smaller parcels that could render them non-viable as standalone properties. The proposed Santa Barbara Ranch project, which is currently pending before the California Coastal Commission, essentially constitutes multiple existing small parcels, currently operating as a single unit for ranching purposes, being sold off to individual landowners, thereby fragmenting ownership of agricultural lands which could affect long-term agricultural viability. However, the Santa Barbara Ranch project also involves the establishment of a permanent easement to protect and ensure continued agricultural productivity over portions of the ranch. The four instances of smaller subdivisions and ownership fragmentations involving more than two adjoining parcels identified in Section 3.0 are generally isolated to a few areas in the vicinity of the project and are not widespread in the region. The proposed project consists of reconfiguring nine existing parcels (one of which was created illegally) into seven parcels, with five of the seven parcels meeting the minimum parcel size requirements under zoning. Thus, it does not equate to a residential subdivision composed of small parcels where agriculture is an afterthought. Of the seven proposed parcels included as part of the project, only proposed Parcel 6 would be large enough to subdivide further. However, steep topography and site constraints including dense vegetation and existing agricultural orchards make further subdivision and subsequent residential development

unlikely in the future. Therefore, the project's contribution to the cumulative impacts associated with subdivision and fragmentation would *not be cumulatively considerable*.

As discussed under Impact AG-2 above, residential development and increased public access in a predominantly agricultural area has the potential to result in indirect impacts on agricultural productivity and long-term viability. Residential development that would occur under the planned and pending projects identified in Section 3.0 would contribute to these potential indirect effects. Similarly, in order to achieve consistency with the California Coastal Act and Coastal Land Use Plan, many of the projects within the coastal zone incorporate public access components, such as that which is included as part of the proposed project, including public access to the beach and extension of the California Coastal Trail. The Right to Farm Ordinance, pesticide regulation by the County Agricultural Commissioner's Office, and adequate buffers in between residential development and public trails and active agricultural operations on adjacent land would help to minimize these potential conflicts and ensure that the future viability and productivity of the area's agriculture is protected. In the case of the proposed project, fencing alongside the public trails to deter trespass and the incorporation of CC&Rs related to future residential development would combine to minimize conflicts between ongoing agricultural activities and residential and recreational use within the project site.

One concern of approving non-agricultural development on agricultural lands is that the speculative value of adjacent agricultural lands also increases if land owners, developers, and other interested parties perceive that the land can be developed in a manner that would be more profitable than continued agricultural production. The development of residential estates within rural agricultural areas of the County has the potential to set a precedent by encouraging further residential estate development in the vicinity and discouraging continued investment in agriculture through the domino effect and introduction of incompatible uses and the conflicts they create. However, it would be speculative to suggest that the physical act of development contemplated in the planned and pending projects identified in Section 3.0 would have this effect, as many of the projects, including the proposed project itself, include elements aimed at providing for continued agriculture in the future through various mechanisms, including for example agricultural conservation easements, continued participation in the Agricultural Preserve Program, clustering development, and CC&Rs. While there is the potential for the rural character of the area to be adversely affected by the introduction of estate-style residences, this does not equate to a physical effect on the area's agricultural productivity or ability to remain agriculturally viable. For the proposed project, the continued viability of the existing ranching and orchard operations is one of its primary objectives and future residential development within each lot would be designed and conditioned to ensure minimal conflicts between the residential and agricultural uses. Further, the existing lots that make up Las Varas Ranch could be developed with residences in their current configuration, as discussed in the No Project Alternative.

While estate-style residential development will occur within the area, as identified by the related projects in Section 3.0, it is expected that agricultural uses will continue and sufficient land will continue to be available for agriculture. Overall, cumulative impacts to agriculture along the Gaviota Coast are considered less than significant. For the reasons discussed above and the nature and extent of the proposed project, the project's contribution to cumulative agricultural impacts is *not cumulatively considerable*.