



July 31, 2023

**To: City of Goleta City Council and Planning Commission**

**From: Katherine Emery, Executive Director, Santa Barbara Audubon Society**

**Regarding: Draft Housing Element, 2023-2031 Site Inventory Rezoning**

The Santa Barbara Audubon Society (SBAS) is a chapter of the National Audubon Society with approximately 1100 members in the Santa Barbara and Goleta area. The mission of SBAS is to protect area birdlife and habitat and connect people with birds through education, conservation, and science. Our members, many of whom reside in Goleta, frequently use the parks, natural areas, and open spaces in and around the City of Goleta for recreational, scientific, and outreach activities.

We thank the Goleta Mayor, City Council, and Planning Commission for this opportunity to comment on Goleta rezoning requests and the Draft Revised Housing Element Site Inventory. In this letter we would like to address possible rezoning of the Kenwood Village property (7264 Calle Real). In 2016, SBAS provided a long list of concerns about water supply, environmental resources, air and water pollution, and traffic, health and safety issues for a much smaller project (60 unit) proposed for this site. The City's Draft Housing Element, however, proposes to rezone this property to high density residential, accommodating up to 284 housing units, which would require a denser and more extensive build out thereby exacerbating the problems with development at this site that we noted in 2016. Our understanding of the current rezoning exercise is that its purpose is to identify sites that would be suitable for high density housing so that the City can meet state housing mandates. **Given our numerous concerns about this site (see below), we conclude that this is not a suitable site for high density residential zoning. We also believe that careful consideration of rezoning proposals with adequate information is necessary, at this point, to circumvent future conflicts over eventual development proposals.**

**Water Supply.** Any development at this site has no firm, formalized commitments for an adequate water supply. Checking with the Goleta Water District (GWD), we found that this site has no "can and will serve letter" from the GWD and has "no water entitlement". Although this site has a very limited water allocation for past agricultural use, Measure J prohibits the use of agricultural water for residential use. Although GWD has stated that it will begin granting new water allocations this fall, the GWD is constrained in its allocations by various ordinances, water supply projections, and demands from other users, so it is not at all clear that the developer will obtain sufficient water to support a very dense development. Goleta's own policies dictate that any land use decisions shall be guided by the evaluations of the adequacy of essential resources or services (GP PF 4.1 d, Inland Zoning Ordinance). Downscaled climate change models predict an increased frequency, intensity, and duration of drought, requiring the City to consider overexpansion that stresses future water supplies.

**Traffic.** The proposed rezoning of Kenwood potentially could result in large impacts on our overtaxed transportation network. The Kenwood property is bordered by a very narrow frontage road, Calle Real. We have concerns about the safety impacts of vehicle access between Calle Real and any dense Kenwood Village development, not only during normal operations but also when access roads and Calle Real are used as evacuation routes during emergencies. Further, any residents of this dense housing development, which is removed from shopping centers, would probably access the Camino Real and Hollister Village malls for shopping, necessitating that they drive through some of the lowest performing intersections in the County (Storke-101, Hollister-Storke). Addition of even small numbers of trips to already poorly performing intersections can greatly decrease levels of service, substantially increasing idling and wait times, contributing to the production of greenhouse gases.

**Agriculture.** Part of this property is currently zoned for agricultural use and the City has many policies for protecting agricultural lands, which would be abrogated by the rezone.

## **Environmental Impacts**

### **Environmentally sensitive habitats (ESH) and species of special concern**

The Kenwood Village property is bordered on the west by El Encanto Creek, which usually contains surface water and has a well-developed riparian zone, parts of which extend onto the Kenwood property. The El Encanto Creek corridor is designated as ESH by the City so is subject to all the City's policies dealing with the protection of ESH and required buffer areas (e.g., CE 1.6 a). Because of the high value that the City places on streams and their riparian zones, this site is also subject to City policies protecting streams, riparian zones, and associated buffer areas (stream protection areas, SPAs). Given the very high housing density potentially designated for this site, it is hard to imagine how this rezoning proposal could not result in eventual impacts on streams, riparian zones, SPAs, and ESHs.

This property is also home to a variety of native species of special concern. The Western pond turtle has been recorded from El Encanto Creek and it is possible that the Red-legged Frog also occurs there. White-tailed Kites (a State Fully Protected Species) and other raptors have been documented using this and nearby areas as nesting, roosting, and foraging sites. Under City or State policy, these species are protected and any areas containing them are considered ESH (GP CE 1.2 k and l, CE 1.9, CE 8.1 d, e, f, CE 8.2). Given the very high housing density enabled by this rezoning proposal, it is also hard to imagine how associated lighting, noise, pets, and biocides would not affect birds and other wildlife. SBAS believes that rezoning decisions should follow General Plan policies.

### **Runoff and water quality**

A rezone that would allow a very high housing density would inevitably result in covering large parts of the rezoned property with impervious surfaces. As a consequence, a dense housing development would alter storm flow paths and volumes, as well as water quality, and such a dense build out would allow only limited space for accommodating mitigation measures, such as bioswales. These impacts on water quantity and quality would not only affect the adjacent stream but also downstream areas, ultimately reaching Devereux Creek (already a 303d impaired water body) and Slough.

### **Air quality**

The Santa Barbara Air Pollution District recommends any housing developments be offset from freeways by at least 500 feet, based on studies of freeway impacts on human health. The dense housing enabled by this rezone would necessitate building in areas that are much closer to the freeway.

On behalf of SBAS, I hope that these comments are useful in guiding Goleta's elected and appointed officials in making sound rezoning decisions while safeguarding the City's many environmental amenities.

Sincerely,

A handwritten signature in cursive script that reads "Katherine Emery".

Katherine Emery, Ph.D.  
Executive Director  
Santa Barbara Audubon Society