



# GOLETA VALLEY CHAMBER OF COMMERCE

*A Head for Business. A Heart for the Community.*

**B-11**

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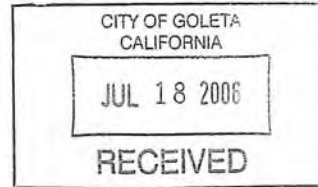
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July 18, 2006

Ken Curtis  
Director of Planning and Environmental Services  
City of Goleta  
130 Cremona Drive, Suite B  
Goleta, CA 93117



Dear Mr. Curtis,

The Goleta Valley Chamber of Commerce is very interested in and has been attentively involved in the progress of creating the General Plan for the City of Goleta.

We are submitting this letter to provide comments to the DEIR for the City of Goleta General Plan. Separate letters are being submitted on our behalf from the following:

Peter Brown, Hatch and Parent  
Whit Manley, of Remy, Thomas, Moose and Manley  
Scott Schell, Associated Transportation Engineers  
Lorraine Woodman, Ph.D., CH2M Hill (enclosed)

And

Goleta Valley Agricultural Viability Analysis, White Paper from CH2Mhill (enclosed)

Enclosed is a peer review comment letter from CH2M Hill regarding the Agriculture and Farmland sections of the Draft EIR. Please address these comments in your responses to the EIR.

As you may know, the Chamber retained CH2MHill to perform an agricultural economic viability study for the Goleta Valley. Enclosed is the white paper resulting from that study as well. The paper finds a number of errors and/or faulty assertions in the Draft EIR and General Plan and we ask that these notes be addressed in the revisions to the EIR.

Of particular note is the designation of farmland locations. The Chamber has opposed the City Council's asserted policy to not allow any zone changes for land zoned as agriculture without doing research and background study as to

**B.11-1**

**B.11-2**

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the economic viability of the parcel. Land uses change over time, traffic patterns change, neighborhoods and communities change, making it pertinent to reexamine land use zoning from time to time. We believe this type of analysis is needed in regard to agriculture parcels in the Goleta Valley. In the absence of a commitment from the City to perform such research, we engaged a reputable firm to perform an objective analysis, therefore assisting the City and ultimately the community to have a discussion about the agriculture industry in our area that includes data on economic viability.

B.11-2

The study reveals some important data, including the inappropriate use of the designation for Prime farmland in the General Plan. The study reports that,

“To meet the requirements for Prime Farmland, the California Department of Conservation FMMP standards require that subject land have been in irrigated agricultural production within the 4 years prior to the mapping date. Contrary to that standard, much of the land classified by the City as “agricultural” has been fallow since at least 2000.”

We would ask that these designations be revised in the EIR.

The Chamber has also been persistent in voicing our concern for providing housing for the community and transportation improvements in the City. To that point, we would ask that the EIR address the potential negative environmental consequences of the “no project” alternative and of the General Plan’s restrictions that prevent new housing and transportation improvements. The pronounced housing shortage in Goleta creates more commuting and more traffic congestion that harms our air quality. To what degree would our environment be enhanced if Goleta employees had the opportunity to live near their jobs. Please include this analysis in the EIR.

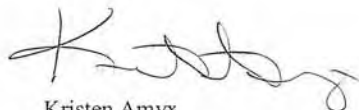
B.11-3

The Chamber believes that the General Plan has gone through so many iterations since it was released that it is impossible for a member of the public to track the changes and have meaningful review of the document. We believe that the City must revise and recirculate the DEIR.

B.11-4

Thank you for the opportunity to comment on the Draft EIR.

Sincerely,



Kristen Amyx  
President/CEO



CH2M HILL  
610 Anacapa Street  
Santa Barbara, CA 93101  
Tel 805.568.0650  
Fax 714.424.2083

June 21, 2006

Ms. Kristen Amyx  
President/CEO  
Goleta Valley Chamber of Commerce  
P.O. Box 781  
Goleta CA 93116

*Re: Comments on Agriculture and Farmland Sections of the City of Goleta's Draft General Plan/Coastal Land Use Plan*

Dear Ms. Amyx:

Thank you for the opportunity to provide comments on the Agriculture and Farmland sections of the Draft EIR for the City of Goleta's Draft General Plan/Coastal Land Use Plan. Impact analyses are included in Sections 3.2, 4.2, and Chapter 5 of the Draft EIR, although other relevant sections of the EIR were reviewed, as well. Detailed comments on the Agriculture and Farmland sections are attached.

Please call me at 568-0650 (office) or 895-4914 (cell phone) if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Lorraine Woodman".

Lorraine Woodman, Ph.D.  
Senior Project Manager

Lorraine Woodman  
 CH2M Hill  
 for  
 Goleta Valley Chamber  
 of Commerce  
 Rev. 7/18/06

**Comments on the City of Goleta's Draft General Plan/Coastal Land Use Plan Draft EIR**

**Comments on Section 3.2, Agriculture and Farmland**

1. **Page 3.2-1, Section 3.2.1, Existing Conditions.** The definition of agriculture that is provided in this section is that used in the Draft General Plan/Coastal Land Use Plan (GP/CLUP) to refer to lands that are being designated as agricultural for planning purposes. This differs from the definition provided in CEQA (California Public Resources Code Section 21060.1), which states that:
  - (a) "agricultural land" means prime farmland, farmland of statewide importance, or unique farmland, as defined by the United States Department of Agriculture land inventory and monitoring criteria, as modified for California.
  - (b) In those areas of the state where lands have not been surveyed for the classifications specified in subdivision (a), "agricultural land" means land that meets the requirements of "prime agricultural land" as defined in paragraph (1), (2), (3), or (4) of subdivision (c) of Section 51201 of the Government Code.

This distinction is important, because the significance criteria that are used in the impact analysis are (correctly) based on the CEQA definition of agricultural land, not the GP/CLUP definition. The impact analysis also should be based on the CEQA definition, not the GP/CLUP definition. The impact analysis uses the term "agricultural land" without regard for whether the land involved meets the CEQA criteria.
2. **Page 3.2-1, Section 3.2.1.1.** Please note that per the Department of Conservation definitions, to be considered Unique Farmland land must also have been used for the production of specific high economic value crops at some time during the two update cycles prior to the mapping date. B.11-6
3. **Page 3.2-1, last line, page 3.2-2, 1<sup>st</sup> line.** The EIR incorrectly states that tax benefits are 35 percent below the Williamson Act valuation. Land restricted by a Farmland Security Zone contract is valued for property assessment purposes at 65 percent of its Williamson Act valuation or 65 percent of its Proposition 13 valuation, whichever is lower. B.11-7
4. **Page 3.2-2, 4<sup>th</sup> full paragraph.** Text appears to be missing between the 1<sup>st</sup> and 2<sup>nd</sup> sentences. B.11-8
5. **Page 3.2-3, 2<sup>nd</sup> full paragraph.** The first sentence states that "Goleta Valley is the fastest growing area on the South Coast of Santa Barbara County" (although no reference is provided for this statement). The remainder of the paragraph discusses the amount of land converted from agricultural use between 2002 and 2004 in Santa Barbara County as a whole. The juxtaposition of these two concepts implies that population growth in the Goleta Valley has led to the conversion of agricultural land in recent years. While this may be true, it is not substantiated in the text, which provides no information on the conversion of agricultural land in the Goleta Valley B.11-9

- |  |                       |
|--|-----------------------|
| <p>other that to mention the Farming on the Edge study (some information is included in the GP/CLUP and could be included with appropriate citations). The first sentence should be deleted or its connection to the remainder of the paragraph should be explained.</p>   | <p><b>B.11-9</b></p>  |
| <p>6. <b>Page 3.2-5, 5<sup>th</sup> full paragraph.</b> As noted, the site referred to as Bishop Ranch contains three parcels with three separate ownerships and different soils characteristics. It therefore would be appropriate to consider them as separate sites, not group them together in the impact analysis (Table 3.2-3).</p>  | <p><b>B.11-10</b></p> |
| <p>7. <b>Page 3.2-4, Section 3.2.1.3.</b> This section would be more appropriately titled "City of Goleta and the Surrounding Area," since the text discusses more than what is within city boundaries.</p>  | <p><b>B.11-11</b></p> |
| <p>8. <b>Page 3.2-4, 4<sup>th</sup> full paragraph, last sentence.</b> The first paragraph on page 3.2-4 states that there are no Williamson Act contract lands located in the Goleta urban area. Please clarify.</p>  | <p><b>B.11-12</b></p> |
| <p>9. <b>Page 3.2-5, 1<sup>st</sup> paragraph, 3<sup>rd</sup> line.</b> Please define what is meant by "intensified."</p>  | <p><b>B.11-13</b></p> |
| <p>10. <b>Page 3.2-5, 3<sup>rd</sup> paragraph.</b> Table 3.2.2 indicates that Bishop Ranch is 290.6 acres, not 287 acres. Additionally, it generally would be helpful to standardize the use of numbers throughout the section (sometimes Bishop Ranch is said to have 290.6 acres, other times, 290 acres; Fairview Gardens is sometimes referred to as 12 acres, sometimes 11.6 acres; etc.; the amount of agricultural land is sometimes referred to as 409 acres, sometimes approximately 410 acres).</p>   | <p><b>B.11-14</b></p> |
| <p>11. <b>Page 3.2-5, 4<sup>th</sup> paragraph.</b> Please provide definitions of Class I, Class II, etc. soils and explain how they relate to the soils' suitability for agricultural uses as part of this discussion (this is not explained until page 3.2-9).</p>   | <p><b>B.11-15</b></p> |
| <p>12. <b>Page 3.2-5, 5<sup>th</sup> paragraph, last sentence.</b> This sentence is not relevant to the impact analysis (none of significance criteria addresses agricultural lands' visibility or potential to offer scenic vistas), and similar discussions are not provided for the other agricultural sites.</p>   | <p><b>B.11-16</b></p> |
| <p>13. <b>Page 3.2-5, 6<sup>th</sup> paragraph, 1<sup>st</sup> sentence.</b> The word "has" in this sentence implies that Bishop Ranch is continuing to support these activities and should be deleted.</p>  | <p><b>B.11-17</b></p> |
| <p>14. <b>Page 3.2-7, 1<sup>st</sup> paragraph.</b> Please describe how long it has been since the parcel was in active production (this information should be provided for all fallow sites).</p>   | <p><b>B.11-18</b></p> |
| <p>15. <b>Page 3.2-8.</b> Please explain why Sites 9 and 10 are not classified as Important Farmland when they contain prime soils.</p>  | <p><b>B.11-19</b></p> |
| <p>16. <b>Pages 3.2-8 and 3.2-9.</b> The discussion of agricultural viability is confusing. The first sentence of the discussion states that "the continued viability of agriculture in the City of Goleta is threatened by urban development," but the analysis does not clearly support this contention. The first sentence is followed by statements regarding minimum parcel sizes necessary to support a viable urban agricultural operation, but no references for these pronouncements were included. Also, it would appear that most of the sites included on Table 3.2-2 meet the minimum parcel sizes mentioned, and subsequent paragraphs explain how farmers are able to improve</p> | <p><b>B.11-20</b></p> |

<p>viability by using several small parcels and using alternative methods, such as organic farming. The phrase "Although agriculture and farmland resources within the City have reduced viability due to the presence of limiting land use factors...", while perhaps true, is not substantiated.</p>	<p>B.11-20</p>
<p>17. Page 3.2-9. The Farmland Protection Policy Act is applicable to federal actions, not local actions such as preparation of a GP/CLUP.</p>	<p>B.11-21</p>
<p>18. Page 3.2-11, 1<sup>st</sup> paragraph. Please explain the relevance of the County of Santa Barbara's Agricultural Preserve Uniform Rules.</p>	<p>B.11-22</p>
<p>19. Page 3.2-11, 2<sup>nd</sup> paragraph. It does not appear that any of the agricultural sites described in the EIR are actually in the Coastal Zone. If not, the discussion of the California Coastal Act is not relevant.</p>	<p>B.11-23</p>
<p>20. Page 3.2-11-3.2-12, <b>Thresholds of Significance.</b> Appendix G of the CEQA Guidelines does not include significance thresholds, per se. Rather, it asks three questions: Would the project:</p> <ul style="list-style-type: none"> <li>a. 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 in the California Resources Agency, to non-agricultural use?</li> <li>b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?</li> <li>c. Involve other changes in the existing environment which, due to their location or nature, could individually or cumulatively result in loss of Farmland, to non-agricultural use?</li> </ul>	<p>B.11-24</p>
<p>Note that the questions do not include "impair the agricultural productivity of prime agricultural land," nor do they provide any procedures or specific guidance for determining significance. Remy, Thomas, et al. in the "Guide to the California Environmental Quality Act [10<sup>th</sup> ed., 1999], p. 180, state: "[t]he new checklist cannot require an agency to find that a loss of prime agricultural land will normally be a significant effect on the environment. Although agencies may be able to distill significance thresholds from the questions posed in the new checklist, the questions do not clearly convey unambiguous thresholds. For example, in answer to the question of whether a project would convert Prime Farmland to non-agricultural use, an agency may identify a less than significant impact. Nothing in the question posed compels the conclusion that any conversion of Prime Farmland constitutes a significant effect. Nor does anything in the language of the question as posed suggest that the loss of any particular acreage of such farmland must be treated as significant."</p>	
<p>Some lead agencies do choose to identify any conversion of Important Farmland as a significant impact, others do not. Because of the inconsistent approach taken by many lead agencies, Senate Bill 850 directed the Resources Agency, in consultation with the Governor's Office of Planning and Research, to "provide lead agencies with an optional methodology to ensure that significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the</p>	

environmental review process” (refer to Public Resources Code Section 21095). Such a methodology was developed by the California Department of Conservation, and is referred to as the California Agricultural Land Evaluation and Site Assessment Model (LESA). The LESA model comprises six different factors, including measures of soil resource quality, site size, water availability, surrounding agricultural lands, and surrounding protected resource lands. Each of these factors is separately rated on a 100-point scale, and a single numeric score is developed and used as the basis for evaluating significance. A similar methodology has been used for many years by Santa Barbara County.

Such a methodology would be more appropriate for this impact analysis, because it would allow an objective, quantifiable determination of project impacts involving the consideration of multiple factors. The current analysis refers to agricultural viability and productivity in the discussions of the environmental setting and project impacts, but neither section demonstrates whether the specific parcels that would be converted to urban uses or retained for agricultural use under the GP/CLUP are in fact viable or productive. For example, as noted in Table 3.2-2, three sites are fallow (Site #2, Couvillion; Site #4b, Bishop Ranch-University Exchange Corporation; and Site #10, Pine Avenue Associates), but the EIR provides no information regarding why these sites are fallow or whether agriculture is a feasible enterprise on these sites.

B.11-24

CEQA clearly indicates that agricultural land is a resource that should be protected, but it does not specify that every parcel of agricultural land must be protected. In fact, the Santa Barbara County Planning and Development Department’s 2002 Goleta Valley Urban Agriculture Newsletter states that “[s]elective [c]onversion of smaller or lower-priority farms will keep the pressure off of the more important farm areas, at least in the short term. There are two basic criteria that can be used to rank urban farmland in order of priority for protection: 1) agricultural value, which must be assessed using such factors as productivity, soil quality, water availability, equipment access, visibility and size, and 2) suitability for development, which should be based on proximity to transit, jobs, shopping and recreation as well as availability of services like sewer lines and utilities....[T]he more compact and efficient development is, the less land must be taken out of agriculture and open space to accommodate it.”

The GP/CLUP and the EIR would benefit from a careful analysis of the parcels that it proposes for preservation, as well as those it proposes for conversion, to ensure that it balances the benefits of agriculture with urban needs in a rational, technically sound manner.

21. **Page 3.2-12, Section 3.2.3.2.** The title probably should say “Discussion of Relevant GP/CLUP Policies. Also, it would be helpful for the reader if the text of the policies were presented in the section rather than have to refer to the GP/CLUP.

B.11-25

22. **Page 3.2-13, Impact 3.2-1.** This is classified as a Class I impact, which is by definition significant and unavoidable, but page 3.2-16 states that MM 3.2-1 would reduce Impact 3.2-1 to less than significant. Also, it is not clear if the description of the conversion of Class I and II soils is additive to the discussion of the conversion of Prime and Unique Farmland. The discussion should be based on the CEQA

B.11-26



definition of Important Farmland (Prime Farmland, Unique Farmland, or Farmland of Statewide Importance), not the GP/CLUP definition. Tables 3.2-2 and 3.2-3 indicate that Site #2 (Couvillion) contains Prime Farmland, but as noted on page 3.2-2, the State of California's definition of Prime Farmland indicates that it must have been irrigated within the past four years. It is our understanding that this parcel has not been irrigated since 2000 and thus does not qualify as Prime Farmland.

B.11-26

23. **Page 3.2-14, Impact 3.2-2.** There is no discussion of where or why incompatible uses and structures within or adjacent to agriculturally productive areas would occur. It would appear that most, if not all, of the agricultural parcels are surrounded by development; how would this change? Also, it would be helpful if the specific policies that would protect agriculture from incompatible uses were described here if they are not included above.

B.11-27

24. **Page 3.2-15, Class III Impacts.** Impacts to workers are not impacts to agricultural resources; note that the significance criteria used focus on impacts to farmland, not people. There also is no explanation of why reducing access to the sites or reducing the viability of agricultural production would be less than significant.

B.11-28

25. **Page 3.2-15, Class IV Impacts.** Wouldn't implementing the GP/CLUP policies (with the exception of the land use plan that would allow conversion of some agricultural land) protect the remaining agricultural land from development and therefore constitute a beneficial impact?

B.11-29

26. **Page 3.2.3.6, Section 3.2.3.6.** This is confusing since the preceding section identifies a mitigation measure that would reduce Impact 3.2-1 to less than significant.

B.11-30

27. **Figures 3.2-1 and 3.2-2** need to include arrows showing where Agricultural Site #4 is.

B.11-31

#### **Comments on Section 4.2, Agriculture and Farmland**

1. **Page 4-5, Subarea A.** The EIR states that the St. Athenasius Church project, which is located within this subarea, was already approved by the County. Table 3-1 describes this project as a new church facility, temple, chapel, and fellowship hall. Please explain how this project would be compatible with the City's GP/CLUP designation of this site as Agriculture.
2. **Page 4-5, Subarea B.** As noted, this subarea contains the Noel Christmas Tree Farm, which would be designated as Agriculture. The tree farm site is included in Table 3-1, which states that County approval of the development of this site with residential uses is pending. Please explain what would occur if the County approved this project.

B.11-32

B.11-33



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*White Paper*

# Goleta Valley Agricultural Viability Analysis

Prepared for  
**Goleta Valley Chamber of Commerce**

July 2006

**CH2MHILL**  
610 Anacapa Street  
Suite B5  
Santa Barbara, CA 93101

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*White Paper*

# Goleta Valley Agricultural Viability Analysis

Submitted to  
**Goleta Valley Chamber of Commerce**

July 2006

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## Executive Summary

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The Goleta Valley Chamber of Commerce (Chamber) commissioned this independent, objective survey of agricultural properties in the Goleta Valley. The agricultural consultants were asked to conduct an analysis to determine the economic viability of agricultural use of agricultural parcels. The Chamber is urging the City of Goleta (City) to consider re-zoning any agricultural parcels that are not viable as an agricultural enterprise and consider using them as potential sites to help meet the City's commitment and need to provide housing. Based on a professional review of available information, and application of standard methodologies, we make the following observations:

- The soils in the Goleta Valley vary widely in their suitability for agricultural production.
- The status of a parcel depends primarily upon (1) the ability of the soil to sustain agricultural production under irrigated conditions, and (2) the availability and cost of irrigation water.
- Agricultural parcels with good soils and a reliable source of relatively inexpensive irrigation water have a distinct competitive advantage and can potentially meet the agricultural viability criteria of being economically attractive to an agricultural lessee.
- Agricultural parcels that must pay the "New Water Supply Service" connection charge of \$52,480 per acre, such as the fallow Couvillion, Bishop Ranch University Exchange Corporation (UEC), and Pine Avenue Associates parcels, cannot generate sufficient net farm income to cover management costs and the high risks associated with the production and marketing of fruits and vegetables. Therefore, they do not meet the criteria of being economically attractive to an agricultural lessee and are not considered agriculturally viable.
- A history of successful irrigation is generally accepted as an indication of the irrigability of soils, and is an essential component of the California Department of Conservation Farmland Mapping and Monitoring Program (FMMP). Most of the agricultural parcels in the City of Goleta have a long history of continuous crop production, so the irrigability of these soils has been demonstrated. However, in an area well suited to crop production from a climatic viewpoint, failed farming attempts and land remaining idle over a period of several years such as those experienced on the Couvillion and Bishop Ranch UEC parcels are strong indicators of soils problems. Credible studies conducted by independent agricultural consultants and laboratories appear to confirm this for those parcels.
- Using the California Department of Conservation FMMP, it is clear that errors have been made in assigning land to categories. A substantial portion of the land designated as "agricultural" in the City of Goleta General Plan/ Coastal Land Use Plan Draft Environmental Impact Report (DEIR) would be considered nonarable (i.e., not suitable for irrigation) under Bureau of Reclamation economic land classification standards. This

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EXECUTIVE SUMMARY

land should not be classified as important farmland or agricultural land appropriate for retention in agricultural use.

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## Appendix

- Crop Enterprise Cost and Return Estimates

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## SECTION 1

## Introduction

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The Goleta Valley Chamber of Commerce (Chamber) commissioned this independent, objective survey of agricultural properties in the Goleta Valley. The agricultural consultants were asked to conduct an analysis to determine the economic viability of agricultural use of agricultural parcels. The Chamber is urging the City of Goleta (City) to consider re-zoning any agricultural properties that are not viable as an agricultural enterprise and consider using them as potential sites to help meet the City's commitment and need to provide affordable housing. This White Paper assesses the agricultural viability and economic factors of agricultural properties within the City of Goleta and includes:

- A background report on Goleta Valley agriculture, including crops historically and currently grown, and any historic changes affecting crop choice, crop income, and production levels
- A review of areas currently or historically in agricultural production in the Goleta Valley
- An analysis of existing and potential agricultural sites in the City of Goleta
- A review of resources and infrastructure needed for maintenance and further agricultural development of those properties, such as water, labor, housing, transportation, and pest management

## SECTION 2

## Study Approach

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The study tasks performed to complete the scope of work for the agricultural viability analysis are as follows:

- Inventory agricultural properties within the City of Goleta.
- Interview selected property owners.
- Conduct interviews with University Cooperative Extension Farm Advisors and other experts with knowledge of Goleta Valley agriculture.
- Gather secondary sources of information on Goleta Valley agriculture from local experts and a search of sources available on the Internet.
- Assemble crop enterprise studies prepared by the University of California Cooperative Extension Service for crops determined to be suitable for production on the agricultural properties in the Goleta Valley.
- Update and adapt the crop enterprise studies to agricultural conditions in the Goleta Valley.
- Conduct an analysis of the economic viability of agricultural use of the properties, including a sensitivity analysis to key variables, such as farm rent or land value.
- Prepare a White Paper on the economic viability of agricultural property within the Goleta Valley.

The crop enterprise studies presented in a subsequent section of this paper are based on the assumption that the agricultural parcels in the Goleta Valley are rented by the owner to a skilled farm operator, and the costs and returns are measured from the perspective of the lessee.



## SECTION 3

## Data Sources

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Contacts made to gather the information contained in this White Paper include the University of California Cooperative Extension Service, U.C. Cooperative Extension Farm Advisors in Santa Maria and Ventura, Santa Barbara County Assessor's Office, Santa Barbara County Auditor-Controller Office, Goleta Valley Chamber of Commerce, Goleta Water District, property owners with fallow land, County of Santa Barbara Agricultural Commissioner's Office, California Agricultural Commodity Commissions, and California Agricultural Statistics Service. A list of previous studies and publications used in the analysis is shown in the references section of this White Paper.

The prices received for representative crops used in this analysis are based on historical averages calculated from state prices published by the California Agricultural Statistics Service. Crop production costs are based in large part on crop enterprise studies conducted by the University of California Department of Agricultural and Resource Economics in association with U.C. Cooperative Extension Farm Advisors. Most of the data used to determine cropping patterns and crop yields in the Goleta Valley were gathered from California Agricultural Statistics Service Reports, City of Goleta General Plan/Coastal Land Use Plan Draft Environmental Impact Report (DEIR), University of California Cooperative Extension studies, field observations, and personal interviews of knowledgeable people in the Goleta area. The cropping patterns, crop yields, prices received, and costs of production obtained from the sources noted above were reviewed and tailored to Goleta Valley conditions on the basis of interviews with the Farm Advisors and local farmers and property owners.

## SECTION 4

## Goleta Valley Agriculture

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The first agricultural enterprises in the Goleta Valley were cattle ranches on land grants made by the Mexican government in the mid-1800s. By the end of the 19th century, the potential for earning higher incomes from growing tree crops, such as lemons and English walnuts, and row crops was recognized. The large land grant ranches were divided into smaller parcels better suited to more labor-intensive farming operations. The next phase of agricultural development was affected by rapid population growth following World War II and the associated demand for residential and business property. In recent years, most of the farms in the valley have been replaced by urban development. As farmland has become scarce, the agricultural land values have risen to levels of \$20,000 to over \$30,000 per acre (Source: 2005 Trends in Agricultural Land and Lease Values), making it difficult to maintain the financial viability of farming operations.

### 4.1 Historical Agricultural Production

The value of gross agricultural production in Santa Barbara County was \$997,601,000 in 2005. The value of agricultural production in the county has risen steadily for decades, increasing to nearly \$1 billion from \$348,169,000 in 1986. The highest value crops at the county level include strawberries (\$202,617,000), wine grapes (\$160,365,000), broccoli (\$112,691,000), head lettuce (\$59,191,000), and cauliflower (\$39,288,000). Significant shifts in agricultural production over the past 5 years have included an increase in the acreage and value of fruit and nut crops to \$415,180,000, an increase in the acreage and value of vegetables to \$348,889,000, and a decrease in the acreage of nursery products, but increase in value to \$169,958,000 (Source: 2005 Agricultural Production Report, Santa Barbara County). The majority of the agricultural land that has converted to other land uses over the 2002-2004 period was Grazing Land (3,854 acres) and Farmland of Local Importance (3,035 acres) (Source: City of Goleta General Plan/Coastal Land Use Plan DEIR).

Agricultural production statistics are not published for the City of Goleta or the Goleta Valley. The Goleta General Plan indicates there are approximately 410 acres of agricultural land within the city limits. High value crops are grown on some of this land, including lemon and avocado orchards, vegetables, and nursery products. More than two-thirds of the agricultural land in the City has been fallow for many years, although some of it has been farmed in the past, growing fruit, walnuts, and vegetables. This substantial acreage of fallow land raises questions about the agricultural viability of farming operations in the Goleta Valley, which prompted this study.

### 4.2 Existing and Potential Agricultural Sites

The information presented in this section is taken from the City of Goleta General Plan/Coastal Land Use Plan DEIR with minor modifications and some additions. Descriptions of twelve distinct ranches or farms are presented.

## SECTION 4: GOLETA VALLEY AGRICULTURE

According to the Goleta General Plan, the agricultural land within the City includes 67.5 acres of Prime Farmland, 0 acres of Farmland of Statewide Importance, 42.5 acres of Unique Farmland, 163.8 acres of Farmland of Local Importance, and 101.1 acres that have not been designated according to the California Department of Conservation FMMP. The agricultural land within the City includes 73 acres of Class I Soils, 106.9 acres of Class II Soils, 133.6 acres of Class III Soils, 57.8 acres of Class IV Soils, 0 acres of Class V Soils, 13.4 acres of Class VI Soils, 10.3 acres of Class VII Soils, and 13.9 acres of Class VIII Soils.

It is important to note the City mapping is based primarily on aerial surveys that are now approximately 25 years old, and does not include in situ soils analysis, or consideration of other important factors to determine suitability of parcels for agriculture. To meet the requirements for Prime Farmland, the California Department of Conservation FMMP standards require that subject land have been in irrigated agricultural production within the 4 years prior to the mapping date. Contrary to that standard, much of the land classified by the City as "agricultural" has been fallow since at least 2000.

#### 4.2.1 Cardio/Pulmo Medical Group

Cardio/Pulmo Medical Group owns a 21.8-acre parcel on the southeast corner of Glen Annie Road and Cathedral Oaks Road. It contains some well-maintained avocado orchards on a portion of the property. This area contains Prime and Unique Farmland according to the City General Plan.

#### 4.2.2 Bishop Ranch

The UEC owns the 238.8-acre Bishop Ranch parcel. This parcel has not been substantially cultivated or irrigated for the past 37 years and has not been used for pasture for at least 16 years. Cattle were grazed from 1985 to 1990. During the same period, about 10 acres of citrus were planted on the northeast corner of the property and then abandoned. An attempt to grow 5 acres of strawberries in 1985 failed, and attempts made to grow 10 acres of Christmas trees in 1990 also failed (Source: Memo to Bishop Ranch by KPM dated August 29, 2002). This area is classified as Farmland of Local Importance in the City General Plan. A study conducted by an independent agricultural consultant in 2006 concluded that it is not practical to utilize the property for any type of agricultural production, primarily because (1) most of the soils are "marginally to poorly" suited for deep rooted crops with a high value, such as lemons, and (2) the only source of irrigation water for this property is from the Goleta Water District, which would assess a \$52,480 per acre new water supply service connection charge for this property (Source: Report on the Agricultural Study for Bishop Ranch, June 16, 2006).

#### 4.2.3 Stow Land Company

The Stow Land Company owns the 30-acre parcel on the southwest corner of Los Carneros Road and Cathedral Oaks Road, which is part of the original Stow Family/La Patera Rancho. The Stow Company parcel is actively farmed as a large lemon and avocado orchard. The site is classified as Prime Farmland in the City General Plan. Both the UEC and the Stow Land Company own acreage planted with avocado and lemon orchards directly across the street on the north side of Cathedral Oaks outside of, but immediately adjacent to, the Goleta city limits.

#### 4.2.4 Fairview Garden Farms

Fairview Garden Farms is an 11.6-acre organic farm located on North Fairview Avenue, one block south of Cathedral Oaks Road. The farm is surrounded by suburban development on all sides. There also is a produce stand and small gravel parking lot along the Fairview Avenue frontage. The farm contains areas of topsoil up to 30 feet in depth, and produces more than 100 different fruits and vegetables annually. The property has been farmed continuously since 1895 and may be the oldest organic farm in southern California. The property is classified entirely as Unique Farmland in the City General Plan.

In 1997, the Center for Urban Agriculture (Center) was formed in response to the Goleta Community Plan designation for the parcel to remain as agricultural for only a few more years. The Center forged an agreement with the Land Trust for Santa Barbara County and purchased the acreage to hold a conservation easement on the property. The easement is a legal agreement between the Center and the Land Trust that guarantees Fairview Gardens will remain a working farm and educational facility in perpetuity. It is the only agricultural acreage in Goleta that is permanently protected with a conservation easement.

Our understanding is that in addition to public and private conservation support in purchasing the Fairview Gardens, the operators continue to receive donations, grants and other subsidies not generally available to private farmers. The Fairview Gardens property also includes on-site farm-worker housing and on-site sales of products grown at the property and elsewhere, thereby further ensuring maintenance of this unique agricultural/educational community facility.

#### 4.2.5 Ellwood Canyon Site

The Ellwood Canyon agricultural area is located in the northwest corner of the City of Goleta, just north of Cathedral Oaks Road and east of Winchester Canyon. Ellwood Canyon Road divides several of the parcels. The 31.5-acre area is owned by three different families. The majority of the site comprises the 27 acre Bradley farm. The smaller farms on the other 4.5 acres have orchards and natural vegetation, while the Bradley farm supports both row crops and greenhouse development. The majority of this property is classified as Prime Farmland in the City General Plan.

#### 4.2.6 Roman Catholic Archbishops

The approximately 9.4-acre property is owned by the Catholic Church and managed by the Archdiocese of Los Angeles. It is located in northwest Goleta and fronts on Calle Road to the south. It is surrounded on the east and north by single-family homes and on the west by a condominium development. Currently, the property is leased to Goleta farmer, John Lane, who grows various row crops for the local Lane Farms business. The property contains soils classified as both Prime Farmland and Unique Farmland.

#### 4.2.7 Philip

The 6.6-acre Philip parcel is located on Stow Canyon Road, north of the Stow Grove community park tennis courts, south of Cathedral Oaks Road, and west of San Pedro Creek. The property contains an avocado orchard and is surrounded by single-family homes, with

the exception of San Pedro Creek to the east. The property is classified entirely as Prime Farmland in the City General Plan.

#### 4.2.8 Herold

The Herold property is located just northeast of the intersection of Fairview and Cathedral Oaks roads, and is composed of several parcels totaling approximately 9.4 acres. The properties contain scattered avocado orchards and several single-family homes. This property is classified entirely as Unique Farmland in the City General Plan.

#### 4.2.9 Couvillion

The 15.05-acre (gross) Couvillion parcel is located in northwestern Goleta, bordered by Glen Annie Golf Course to the east and north, a drainage/riparian area to the west, and Cathedral Oaks Road to the south. The site was originally part of a 25-acre parcel, which was divided by Cathedral Oaks Road. This road occupies approximately 2.5 acres of the site. Several attempts have been made to farm the property, including planting it with organic lemons, but all have failed due to a clay hard-pan below the relatively shallow top soil, which inhibits drainage. An attempt was made to grow avocados on the parcel during the period 1987 to 2000. Trees were planted on fertile and well-drained mounds to mitigate drainage and root penetration problems associated with the clay subsoil. The mound system failed in 1995-1996 as the avocado roots hit the clay subsoil, and the orchard was abandoned in 2000. The land is now fallow except for a few trees on the northern end of the parcel, where a steep slope allows some drainage. In addition to Cathedral Oaks Road, the property contains a house and outbuildings, and is impacted by the adjacent golf course. Based on our review of available data and a site visit to the property, it is clear that the parcel has been incorrectly classified by the City as Prime Farmland. The site has in fact been mapped by the California Department of Conservation's FMMP as "grazing land," although the site is clearly too small for a viable grazing operation, and all adjacent lands have been converted to non-agricultural use. In addition to the land being fallow for the past 6 years, studies conducted by independent agricultural consultants including a soils survey performed by Fruit Grower Laboratory, Inc., concluded there is no profitable agricultural option for this parcel. The study shows that Natural Resources Conservation Service, or NRCS, mapped Class II soils cover only approximately seven usable acres, and are underlain by clay hard pan. It appears that most of that area has subsequently been covered with compacted soil from development of the Cathedral Oaks Road extension. Poor soils, clay hardpan, and low fertility were cited as severe constraints to the successful cultivation of orchard, vegetable, and fruit crops. These reports indicate poor economic returns, high price of entry, and small parcel size preclude successful dryland, orchard, vine, and vegetable crops, or livestock. Further, there would likely be conflicts with urban land uses if an intensive agricultural operation were established on the parcel (Source: Report prepared for the Shelby Family Partnership [Double R Ranch] Property dated June 2006, with appended supporting reports and data).

#### 4.2.10 Sumida

Located in the eastern portion of Goleta, this 21.2-acre parcel is composed of the La Sumida Nursery and active agricultural uses in the southern and eastern portions of the parcel, avocado trees within the site along the northeast parcel boundary, and fallow agriculture

## SECTION 4: GOLETA VALLEY AGRICULTURE

land in the central and northeast portions of the property. The site is relatively flat and is completely surrounded by development. The property is classified entirely as Unique Farmland and contains prime agricultural soils according to the City General Plan.

#### 4.2.11 McPage Enterprises

The 12.2-acre site is located in the southeastern portion of the City of Goleta. The parcel is flat and consists of active agriculture uses. The parcel is bordered to the northwest by a small tributary to the San Jose Creek that supports southern willow scrub habitat. Surrounding land uses also include fallow agriculture to the west and development to the northeast, south, and southwest. The site is not classified as Important Farmland, but contains prime agricultural soils according to the City General Plan.

#### 4.2.12 Pine Avenue Associates

The site is flat and includes 2.4 acres of fallow agricultural land. The parcel is bordered to the northwest by a small tributary to the San Jose Creek that supports southern willow scrub habitat. Surrounding land uses also include developed lands to the south and active agriculture to the east. The site is not classified as Important Farmland, but may contain prime agricultural soils according to the City General Plan.

### 4.3 Crop Enterprise Costs and Returns

The representative crops identified as being agronomically suited to the Goleta Valley with sufficient income to provide potentially adequate returns on the required investment include irrigated lemons, wine grapes, broccoli, avocado, cauliflower, iceberg lettuce, strawberries, raspberries, and blueberries. A summary of the annual estimated farm income, farm costs, and net farm income for these crops, along with dryland, no-till barley, is presented in Table 1. The net farm income is measured from the viewpoint of a lessee farm operator, and represents the expected returns to management and risk. In conducting the crop enterprise analysis, it was assumed the crops are grown on irrigable soils with good drainage. More detailed information on the costs and returns is provided in the individual crop enterprise studies in the Appendix to this White Paper.

TABLE 1  
Annual Costs and Returns per Acre for Representative Goleta Valley Crops

Crop	Farm Income (\$)	Farm Costs (\$)	Net Farm Income (Loss) (\$)
Dryland Barley	169	1,532	(1,363)
Irrigated Lemons	5,463	12,558	(7,095)
Irrigated Wine Grapes	6,628	5,447	1,180
Irrigated Fresh Market Broccoli	5,320	8,819	(3,499)
Irrigated Organic Broccoli	6,500	9,508	(3,008)
Irrigated Avocado	6,675	6,906	(231)
Irrigated Cauliflower	5,284	8,310	(3,026)



## SECTION 4: GOLETA VALLEY AGRICULTURE

**TABLE 1**  
Annual Costs and Returns per Acre for Representative Goleta Valley Crops

Crop	Farm Income (\$)	Farm Costs (\$)	Net Farm Income (Loss) (\$)
Irrigated Iceberg Lettuce	6,230	9,017	(2,787)
Irrigated Strawberries	34,428	33,262	1,166
Irrigated Raspberries	36,000	31,355	4,645
Irrigated Blueberries	24,354	23,668	686

The mild climate and fertile soils in the Goleta Valley allow the year-round production of a wide variety of crops. The normal annual rainfall is 16.25 inches (Source: Western Regional Climate Center, Reno, Nevada), so irrigation is necessary for crop production to be financially viable. Some dryland crops, such as grain and pasture, can be grown with this limited amount of rainfall, so a cost and returns study for dryland, no-till barley was performed to demonstrate the viability of farming without irrigation.

The cost and returns studies summarized in Table 1 are based on a typical farming arrangement with the parcel owner leasing the land to a skilled farm operator. The parcel owner receives an average annual rent of \$2,222 per acre and provides the on-farm irrigation system. It was assumed that irrigation water is obtained from the Goleta Water District at a cost of \$435 per acre-foot. The Goleta Water District's "New Water Supply" connection charge of \$26,240 per acre-foot, or \$52,480 per acre for the required capacity of 2 acre-feet per acre, is not included in the farm costs. For parcels with fallow land in need of a new irrigation supply, such as the Couvillion and Bishop Ranch parcels, this would add \$3,813 per acre to the annual farm costs (\$52,480 amortized over a 30-year period at 6 percent interest). Some agricultural parcels in the Goleta Valley obtain irrigation water at a cost of less than \$435 per acre from wells and small reservoirs constructed on creeks.

As shown in Table 1, if it is assumed that irrigation water is available at a cost of \$435 per acre-foot, wine grapes, strawberries, raspberries, and blueberries have a positive net farm income. For parcels needing a new irrigation water supply, only raspberries would have a positive net farm income, estimated as about \$832 per acre per year.

Net farm income (i.e., returns to management and risk) provides a measure of the incentive for farm operators to lease an agricultural parcel. Farmer's expectations of adequate returns to management and risk vary widely among individuals. Some farmers are willing to accept returns to management labor that are substantially less than their opportunity costs (i.e., the maximum value for nonfarm uses). The farm costs shown in Table 1 do not include wages for management. Similarly, the risk management skills and tolerance for risk vary widely among farm operators. The risks associated with the production and marketing of fruits and vegetables are high, and no farm cost has been assigned to these risks. Some risks can be managed by purchasing crop insurance. For example, the Federal Crop Insurance Program under the Risk Management Agency, U.S. Department of Agriculture, provides protection against low revenue due to unavoidable natural disaster and market fluctuations. This program can provide up to 75 percent of the crop revenue anticipated without the disaster.



## SECTION 4: GOLETA VALLEY AGRICULTURE

The farm costs shown in Table 1 do not include crop insurance since the residual net farm income is intended to measure returns to risk. To illustrate the magnitude of market risk, over the ten-year period used to calculate the average price received for raspberries of \$12 per flat, the price ranged from a low of \$9.73 per flat to a high of \$14.63 per flat. A change in price of \$1.00 per flat translates to an increase or decrease in annual net farm income of approximately \$3,000 per acre. Therefore, for parcels needing a new water supply, it appears highly unlikely that the estimated annual net farm income of \$832 per acre for raspberries would be considered an adequate return to management and risk.

Greenhouses were not included in the analysis. The costs of construction for greenhouses have risen to about \$20 per square foot, and this business is suffering from foreign competition. Greenhouse operators who expressed some interest in constructing a facility on the Couvillion parcel have reportedly lost interest. In addition, approval for the construction of a greenhouse on parcels adjacent to residential areas is unlikely because of the adverse visual effects, early morning noise, need for a large agricultural work force, truck traffic, and other neighborhood disturbances.

There are numerous nurseries in the Goleta Valley that appear to be economically viable. Most sell products grown on their parcel at roadside markets, local farmer's markets, and other wholesale and retail nurseries. The existing nurseries are adequate to serve local needs so any expansion in production would be to serve markets outside the Goleta Valley, which some nurseries already do. However, there are other areas in Santa Barbara County and in neighboring counties better suited to serve these external markets because of lower rent and costs of production, better proximity to agricultural labor and agribusiness services, and more compatible land uses. Therefore, it was assumed that existing nurseries are agriculturally viable, but lessees interested in developing new nurseries would not be attracted to agricultural parcels located in the City of Goleta.

## SECTION 5

## Resources and Infrastructure Needs of Agriculture

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The resources and infrastructure needs of primary significance for agriculture in the Goleta Valley include land, soils, and irrigation water.

The supply of land suitable for agriculture has dwindled and become more expensive as urban development has resulted in the conversion of farmland to residential and business uses. The typical farming arrangement is for parcel owners to lease their land to farm operators with the skills necessary to manage the complex production and marketing process involved in producing high value crops. The farm rental rate for the better soils well adapted to growing perennial and other crops range from \$3,500 to \$4,000 per acre. Lands with poorer, heavy soils produce lower crop yields and require special management. They rent from \$1,500 to \$2,000 per acre, and are better adapted to the production of annual crops, such as broccoli, lettuce, and tomatoes. Soil conditions and drainage problems on certain parcels preclude even annual crops, and such parcels generally remain fallow. The average annual farm rent is about \$2,222 per acre with the owner providing the on-farm irrigation system. As shown in Table 1, only crops producing high gross income can be grown profitably with these farm rental rates.

The agricultural value of land in the Goleta Valley has been estimated as \$25,000 per acre. Agricultural land values reflect the income (i.e., farm rent) potential from agricultural use of the land and exclude such considerations as the potential for residential development or use as a luxury home site and hobby farm. There have been few sales of agricultural property in the area, so it is difficult to determine fair market value. A 200-acre parcel of irrigated land near Camarillo sold recently for \$150,000 per acre (Source: Personal communication with Farm Advisor). In view of the prices being paid for a typical tract house lot, it is likely the smaller agricultural parcels in the City of Goleta would sell for prices well over \$150,000 per acre as sites for a luxury residence and hobby farm. However, the cost and returns studies demonstrate that farmland purchased at these prices cannot support any economically viable crop enterprises. The farm rent associated with a land value of \$150,000 is about \$9,000 per acre. The net farm incomes shown in Table 1 are based on a farm rent of \$2,222 per acre. Increasing the farm rent by \$6,778 (\$9,000 minus \$2,222) would decrease net farm income by roughly the same amount, and none of the representative crops would be economically viable. This documents assertions made by the Farm Advisor (Source: Personal communication) and Goleta farm operators that it is not feasible to purchase land at current market prices for agricultural use (Source: Goleta Valley Urban Agriculture Newsletter).

The soils in the Goleta Valley vary widely in their suitability for agricultural production. The Soils Survey of Santa Barbara County published by the Soil Conservation Service (now NRCS), U.S. Department of Agriculture, is the primary source of soils information available for the Goleta Valley. The NRCS Soil Survey is a useful starting point for an irrigation suitability land classification study as performed under procedures developed by the Bureau of Reclamation

## SECTION 5: RESOURCES AND INFRASTRUCTURE NEEDS OF AGRICULTURE

for use in determining the arability and irrigability of land. The NRCS Soil Survey is generally based on 1970-80s era aerial photo-mapping and analysis of cropping at the time of survey, and should not be relied on as the sole determinant of soil type or the suitability of parcels for agriculture. The lack of an irrigation suitability land classification has led to a trial-and-error approach to agricultural development in the Goleta Valley and some costly failures. It also has contributed to confusion and controversy over the designation of land as agricultural for planning purposes. It is clear that errors have been made in assigning land to categories using FMMP, the California Farmland and Monitoring Program (Sources: Report on Bishop Ranch, p.1, and Soils Survey, Double R Ranch, p.2). A substantial portion of the land designated as agricultural in the City of Goleta's General Plan/Coastal Land Use Plan DEIR would be considered nonarable under Bureau of Reclamation economic land classification standards.

Groundwater was the primary source of irrigation water in the Goleta Valley prior to the completion of the Bradbury Dam and Cachuma Reservoir in 1956. The Cachuma Reservoir, a U.S. Bureau of Reclamation project, was planned to serve irrigation, but the water is commingled with other sources and the share delivered to municipal customers has grown rapidly over the years. The rapid growth in municipal water demands and drought conditions in the 1980s prompted a 25-year moratorium on new water service, which ended in 1997 (Source: Personal communication with Goleta Water District). The manager of the Goleta Water District reports that irrigation water is available now for those willing to pay an initial "New Water Supply" charge of \$26,240 per acre-foot and an annual water charge of \$435 per acre-foot. The initial charge amounts to \$52,480 per acre, based on an irrigation requirement of 2 acre-feet per acre. A major concern to irrigators planning to invest in the establishment of perennial crops, in addition to the high cost of water, is the risk of water shortages and crop damage because municipal uses take priority over agricultural uses during a drought. The Goleta Water District is a State Water Project (SWP) Contractor and their sources of water are the SWP, Cachuma Project, and groundwater. Some of the small, presently irrigated farms in the Goleta Valley obtain water from groundwater. The operator of a nursery in the City indicated it obtains irrigation water from a 200 feet deep well. He said the water has a high level of salinity and minerals, which are harmful to plants, but the problem is manageable. The groundwater aquifer has been depleted in most areas, however, and the low yield from wells is seasonal and inadequate for irrigation purposes. A few agricultural parcels have water rights on streams, such as Los Carneros Creek, and have constructed small reservoirs for irrigation purposes. Thus, the reliability and cost of an irrigation water supply is a major constraint on the viability of agricultural enterprises in the Goleta Valley, and especially for any new agricultural development dependent upon service from the Goleta Water District.

Farmers can encounter a hostile environment maintaining their farming operations in an urban area. Row crops are particularly troublesome because of the high level of activity with farm equipment, early working hours, and associated tractor noise and dust. The use of pesticides is another concern that can be problematic for the farmer. For example, the Agricultural Commissioner has recently banned the application of agricultural chemicals by helicopter in urban areas, which creates a serious problem for avocado growers needing to spray for thrips. Availability of farm laborers and affordable housing is another problem in urban areas. Many farm laborers in the Goleta area must commute from distant locations, such as Lompoc or Oxnard, because of the lack of nearby affordable housing. Many essential farm services, such as tractor repair, are no longer available in the Goleta area. The infrastructure for agriculture has dwindled as the amount of farmland has declined.

## SECTION 6

## Findings

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The key variables in determining agricultural viability in the Goleta Valley include land values and the associated farm rent, irrigation water costs, operating costs, and irrigability of soils. As land values and farm rents have risen, farm operators have adjusted by growing higher valued crops. Farm rent averages \$2,222 per acre and the annual irrigation water charge is about \$870 per acre plus a \$3,813 amortized annual cost per acre for the new water supply fee. In addition, perennial crops have high establishment costs ranging up to over \$3,000 per acre per year on an amortized basis. Operating costs for frost protection, fertilizer, pesticides, pruning, harvesting, and other cultural operations range from \$2,000 to nearly \$30,000 per acre for the various irrigated crops considered in this study. Prices received and crop yields also are important. Farmers can influence operating costs and crop yields through good management, but have very little influence over the other variables. Farmers owning their land can choose to accept a lower rate of return than other opportunities would afford, unless they are burdened with large mortgage payments. Farm operators who rent their land do not have this option and can lose their lease if the owner decides to sell, or they cannot keep up with rent payments.

The conclusions from this analysis are summarized as follows:

- The status of a parcel depends primarily upon the ability of the soil to sustain agricultural production under irrigated conditions. Traditional citrus and row crops do not generally generate sufficient net farm income to meet the criteria of being economically attractive to an agricultural lessee.
- Agricultural parcels with good soils and a reliable source of relatively inexpensive irrigation water have a distinct competitive advantage and can be expected to earn net farm incomes that exceed those shown in Table 1.
- Agricultural parcels that must pay the "New Water Supply Service" connection charge of \$52,480 per acre do not generate sufficient net farm income to cover management costs and the high risks associated with the production and marketing of fruits and vegetables. Therefore, they do not meet the criteria of being economically attractive to an agricultural lessee and are not considered agriculturally viable.
- It is not financially feasible to purchase land in the City of Goleta at current market prices for agricultural use.
- A history of successful irrigation is a generally accepted indication of the irrigability of soils. Most of the agricultural parcels in the City of Goleta have a long history of continuous crop production, so the irrigability of the soils has been demonstrated. However, in an area well suited to crop production from a climatic viewpoint, failed farming attempts and idle land over a period of several years such as those experienced on the Couvillion and Bishop Ranch UEC parcels, are strong indicators of soils

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SECTION 6: FINDINGS

problems. Credible studies conducted by independent agricultural consultants and laboratories appear to confirm this for those parcels.

- Based on the information available for this analysis, it appears soils deficiencies are the primary reason for the substantial acreage of fallow agricultural land in the City of Goleta. The Couvillion parcel and the Bishop Ranch UEC parcel appear to lack the attributes for agricultural viability.
- Farm rent alone prevents dryland farming from being economically viable.

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*White Paper  
Appendix*

# Goleta Valley Agricultural Viability Analysis

Prepared for  
**Goleta Valley Chamber of Commerce**

July 2006

**CH2MHILL**

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## APPENDIX

## Crop Enterprise Cost and Return Estimates

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The purpose of this appendix is to provide documentation for the crop enterprise cost and return estimates.

### Crop Enterprise Assumptions and Inputs

1. The prices received for crops are based on a 10-year historical average (1998 to 2004) for crops grown in California (Source: California Agricultural Statistics, 2004).
2. Crop yields are based on information from University of California Cooperative Extension Service studies, with adjustments for local conditions based on field observations and interviews with local farmers and agricultural experts.
3. Land suitable for the production of orchard crops, wine grapes, and row crops has an average agricultural value of \$25,000 per acre. The agricultural value of rangeland in Santa Barbara County ranges from \$300 to \$8,500 per acre. Sources of these estimates include the 2005 Trends in Agricultural Land & Lease Values published by the California Chapter of the American Society of Farm Managers and Rural Appraisers, and interviews with Cooperative Extension Farm Advisors.
4. Average annual farm rent is \$2,222 per acre with the parcel owner providing the on-farm irrigation system.
5. Farm expenses are based primarily on estimates provided by studies done by the University of California Cooperative Extension Service and published in bulletins listed in the references section. Adjustments were made to fit Goleta Valley conditions in 2005.
6. Estimates of the capital cost and annual operations and maintenance costs for on-farm irrigation systems were obtained from the Cooperative Extension Service and farmer interviews. Irrigation water assessments were obtained from the Goleta Water District.
7. Labor rates used in the analysis, including social security and other benefits, are \$10.35 per hour for general labor. Wages for managers are not included as a cash cost. Any returns above total costs (i.e., net farm income) are considered a return to management and risk.
8. The interest rate for calculating interest on operating capital of 7.65 percent is based on the typical market rate for borrowing funds. It was assumed that the operating capital loan would be for 6 months per year.
9. The interest rate of 6 percent used in calculating capital recovery costs is the United States Department of Agriculture, Economic Reporting Service's 10-year average for California's agricultural sector long run rate of return to production assets from current income.

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APPENDIX: CROP ENTERPRISE COST AND RETURN ESTIMATES

10. Farm equipment is purchased new or used, but the study shows the current purchase price for new equipment. The new purchase price is adjusted to 60 percent to reflect a mix of new and used equipment.

### **Crop Enterprise Studies**

Crop enterprise studies for dryland barley and irrigated lemons, wine grapes, fresh market broccoli, organic broccoli, avocado, cauliflower, iceberg lettuce, strawberries, raspberries, and blueberries are attached.

**Crop Enterprise Budget  
Dryland Barley  
Goleta Valley Agricultural Viability Analysis**

ITEM	UNIT	PRICE	QUANTITY	AMOUNT PER ACRE	
		Dollars		Dollars	Dollars
<b>INCOME</b>					
Barley	Ton	113.00	1.50	169.50	
TOTAL INCOME					169.50
<b>OPERATING COSTS</b>					
Herbicide					
Roundup	Pint	6.83	1.75	11.95	
Weedar 64	Pint	2.07	1.00	2.07	
Glean DF	Oz.	34.60	0.17	5.88	
Seed					
Barley	Lb.	0.12	80.00	9.60	
Fertilizer					
Aqua Ammonia	Lb.	0.193	60.00	11.58	
Custom					
Air Application	Appl.	5.000	1.00	5.00	
Haul Grain	Ton	2.000	2.00	4.00	
Labor (Machine)	Hour	7.71	0.87	6.71	
Labor (Non-Machine)	Hour	15.87	0.60	9.52	
Fuel - Gas	Gal.	2.25	0.30	0.68	
Fuel - Diesel	Gal.	2.00	9.42	18.84	
Lube	Acre	1.25	1.00	1.25	
Machinery Repair	Acre	15.67	1.00	15.67	
Interest on Operating Capital	Acre	3.93	1.00	3.93	
TOTAL OPERATING COSTS					106.68
<b>CASH OVERHEAD COSTS</b>					
Office Expenses	Acre	4.90	1.00	4.90	
Property Taxes	Acre	0.85	1.00	0.85	
Property Insurance	Acre	0.61	1.00	0.61	
Investment Repairs	Acre	0.05	1.00	0.05	
TOTAL CASH OVERHEAD COSTS					6.41
<b>NON-CASH OVERHEAD COSTS (Capital Recovery)</b>					
Shop Buildings	Acre	0.69	1.00	0.69	
Shop Tools	Acre	0.17	1.00	0.17	
Grain Storage	Acre	0.50	1.00	0.50	
Fertilizer Tanks	Acre	0.25	1.00	0.25	
Fuel Tanks	Acre	0.54	1.00	0.54	
Farm Rent	Acre	1,400.00	1.00	1,400.00	
Equipment	Acre	16.91	1.00	16.91	
TOTAL NON-CASH OVERHEAD COSTS					1,419.06
TOTAL COSTS					1,532.15
<b>NET FARM INCOME</b>					<b>\$ (1,362.65)</b>

Source: Sample Costs to Produce Barley, University of California Cooperative Extension, 1994.  
The net farm income represents a return to management and risk.

**Crop Enterprise Budget  
Irrigated Lemons  
Goleta Valley Agricultural Viability Analysis**

ITEM	UNIT	PRICE	QUANTITY	AMOUNT PER ACRE	
		Dollars		Dollars	Dollars
<b>INCOME</b>					
Lemons 37.5 Lb. Carton	Carton	5.99	912.00	5,462.88	
TOTAL INCOME					5,462.88
<b>OPERATING COSTS</b>					
Frost Protection					
Water	Acin	7.50	2.20	16.50	
Wind Machine Operation	Hour	2.93	100.00	293.00	
Fertilizer					
Un 32	Lb. N	0.44	100.00	44.00	
Urea Low Biuret	Lb. N	0.48	30.00	14.40	
Zinc Sulfate 36%	Lb.	0.56	2.00	1.12	
Tecmangam (31% Mn)	Lb.	0.63	2.00	1.26	
Assessment					
Citrus Research/55Lb. Box	Box	0.03	622.00	18.66	
Tristeza Eradication	Acre	10.00	1.00	10.00	
Herbicide					
Princep 90S	Lb.	3.27	4.00	13.08	
Karmex	Lb.	5.62	4.00	22.48	
Roundup Original Max	Pint	4.38	0.60	2.63	
Insecticide					
Success	Oz.	5.86	6.00	35.16	
Spray Oil 415	Gal.	3.87	0.05	0.19	
Esteem	floz.	5.67	17.00	96.39	
Custom/Contract					
Prune- Top	Acre	28.00	1.00	28.00	
Prune- Hedge	Acre	15.00	1.00	15.00	
Prune- Hand & Sack	Acre	200.00	1.00	200.00	
Prune- Stack Toppings	Acre	20.00	1.00	20.00	
Prune- Stack Hedgings	Acre	10.00	1.00	10.00	
Prune- Shred Toppings	Acre	20.00	1.00	20.00	
Prune- Shred Hedgings	Acre	10.00	1.00	10.00	
Prune- Shred Hand Prunings	Acre	10.00	1.00	10.00	
Spray Ground- N/Katydid	Acre	25.00	1.00	25.00	
Spray Ground- N & minor nutrients	Acre	25.00	1.00	25.00	
Spray Ground- Scale.	Acre	75.00	1.00	75.00	
Spray Ground- Copper or Fertilizer	Acre	30.00	1.00	30.00	
Spray Ground- Growth Regulator	Acre	45.00	2.00	90.00	
Leaf Analysis	Acre	31.00	0.10	3.10	
Harvest Pick & Haul	Carton	2.00	1,140.00	2,280.00	
Harvest Pack	Carton	4.50	912.00	4,104.00	
PCA Fees	Acre	35.00	1.00	35.00	
Irrigation					
Water	Ac. Ft.	435.00	2.00	870.00	
Soil Amendment					
Gypsum Soluble	Ton	120.00	1.00	120.00	

**Crop Enterprise Budget  
Irrigated Lemons  
Goleta Valley Agricultural Viability Analysis**

ITEM	UNIT	PRICE	QUANTITY	AMOUNT PER ACRE	
Fungicide					
Hydrated Lime	Lb.	0.20	10.00	2.00	
Kocide 20/20	Lb.	1.90	10.00	19.00	
Growth Regulator					
Hivol 44	Fl. oz.	4.46	1.25	5.58	
Gib Gro 4LS	Gram	0.70	32.00	22.40	
Labor (Machine)	Hrs.	14.30	9.50	135.85	
Labor (Non-machine)	Hrs.	10.35	10.65	110.23	
Fuel- Gas	Gal.	2.25	9.26	20.84	
Lube	Acre	3.00	1.00	3.00	
Machinery Repair	Acre	10.00	1.00	10.00	
Interest on Operating Capital	Acre	339.20	1.00	339.20	
<b>TOTAL OPERATING COSTS</b>					9,207.05
<b>CASH OVERHEAD COSTS</b>					
Liability Insurance	Acre	9.00	1.00	9.00	
Office Expenses	Acre	120.00	1.00	120.00	
Property Taxes	Acre	115.00	1.00	115.00	
Property Insurance	Acre	34.00	1.00	34.00	
investment Repairs	Acre	124.00	1.00	124.00	
<b>TOTAL CASH OVERHEAD COSTS</b>					402.00
<b>NON-CASH OVERHEAD COSTS (Capital Recovery)</b>					
Buildings 30'x60'	Acre	73.00	1.00	73.00	
Fuel Tanks 2-250g	Acre	4.00	1.00	4.00	
Shop Tools	Acre	21.00	1.00	21.00	
Farm Rent	Acre	2,222.00	1.00	2,222.00	
Gypsum Machine	Acre	131.00	1.00	131.00	
Establishment	Acre	282.00	1.00	282.00	
Wind Machine (6)	Acre	175.00	1.00	175.00	
Equipment	Acre	41.00	1.00	41.00	
<b>TOTAL NON-CASH OVERHEAD COSTS</b>					2,949.00
<b>TOTAL COSTS</b>					12,558.05
<b>NET FARM INCOME</b>					<b>\$ (7,095.17)</b>

Source: Sample Costs to Establish an Orchard and Produce Lemons. 2005. University of California Cooperative Extension.

The net farm income represents a return to management and risk.

**Crop Enterprise Budget  
Irrigated Wine Grapes  
Goleta Valley Agricultural Viability Analysis**

ITEM	UNIT	PRICE	QUANTITY	AMOUNT PER ACRE	
		Dollars		Dollars	Dollars
<b>INCOME</b>					
Wine Grapes	Ton	552.30	12.00	6,627.60	
<b>TOTAL INCOME</b>					6,627.60
<b>OPERATING COSTS</b>					
Trellis system					
Trellis Materials	Acre	10.00	1.00	10.00	
Custom					
Prune Mechanical	Acre	85.00	1.00	85.00	
Machine Harvest	Acre	225.00	1.00	225.00	
Houl to Crusher	Ton	10.00	12.00	120.00	
Herbicide					
Roundup Ultra Max	Pint	8.56	1.66	14.21	
Goal 2XL	Pint	16.21	1.00	16.21	
Surflan 4AS	Pint	16.96	2.64	44.77	
Irrigation					
Water	Ac. Ft.	435.00	2.00	870.00	
Fungicide					
Wetable Sulfur	Lb.	0.21	6.00	1.26	
Dusting Sulfur	Lb.	0.18	30.00	5.40	
Rubican EC	Fl. oz.	2.50	4.00	10.00	
Flint	Oz.	16.49	1.50	24.74	
Fertilizer					
UN 32	Lb. N	0.44	40.00	17.60	
Neutral Zinc 50%	Lb.	0.92	5.00	4.60	
Insecticide					
Lorsban 4E	Pint	6.86	4.00	27.44	
Kryocide	Lb.	3.00	6.00	18.00	
Provado 1.6 Solupak	Oz.	43.96	0.75	32.97	
Labor (Machine)	Hour	12.73	15.71	199.99	
Labor (Non-Machine)	Hour	10.35	10.15	105.05	
Fuel - Gas	Gal.	2.25	7.93	17.84	
Fuel - Diesel	Gal.	2.00	27.34	54.68	
Lube	Acre	8.00	1.00	8.00	
Machinery Repair	Acre	35.00	1.00	35.00	
Interest on Operating Capital	Acre	74.50	1.00	74.50	
<b>TOTAL OPERATING COSTS</b>					2,022.26
<b>CASH OVERHEAD COSTS</b>					
Liability Insurance	Acre	6.00	1.00	6.00	
Office Expenses	Acre	75.00	1.00	75.00	
Sanitation Fee	Acre	20.00	1.00	20.00	
Property Taxes	Acre	107.00	1.00	107.00	
Property Insurance	Acre	32.00	1.00	32.00	
investment Repairs	Acre	174.00	1.00	174.00	

**Crop Enterprise Budget  
Irrigated Wine Grapes  
Goleta Valley Agricultural Viability Analysis**

ITEM	UNIT	PRICE	QUANTITY	AMOUNT PER ACRE
TOTAL CASH OVERHEAD COSTS				414.00
NON-CASH OVERHEAD COSTS (Capital Recovery)				
Farm Rent	Acre	2,222.00	1.00	2,222.00
Drip Irrigation System	Acre	74.00	1.00	74.00
Buildings	Acre	46.00	1.00	46.00
Tools- Shop/Field	Acre	10.00	1.00	10.00
Fuel Tanks	Acre	2.00	1.00	2.00
Vineyard Establishment	Acre	590.00	1.00	590.00
Equipment	Acre	67.00	1.00	67.00
TOTAL NON-CASH OVERHEAD COSTS				3,011.00
TOTAL COSTS				5,447.26
NET FARM INCOME				\$ 1,180.34

Source: Sample Costs to Establish and Produce Wine Grapes. 2005. University of California Cooperative Extension.

The net farm income represents a return to management and risk.



**Crop Enterprise Budget  
Irrigated Fresh Market Broccoli  
Goleta Valley Agricultural Viability Analysis**

ITEM	UNIT	PRICE	QUANTITY	AMOUNT PER ACRE	
		Dollars		Dollars	Dollars
<b>INCOME</b>					
Broccoli 22 Lbs./Box	Box	8.00	665.00	5,320.00	
<b>TOTAL INCOME</b>					5,320.00
<b>OPERATING COSTS</b>					
<b>Contract</b>					
Harvest: Cut, Bunch, Pack, Haul	Box	3.90	665.00	2,593.50	
Cool, Pelletize	Box	1.90	665.00	1,263.50	
Sell	Box	0.80	665.00	532.00	
<b>Custom</b>					
Haul & Spread Manure	Ton	20.00	0.75	15.00	
List/Fertilize	Acre	13.50	1.00	13.50	
Ground Application- AN20	Acre	16.50	2.00	33.00	
Ground Application- Pesticide	Acre	16.50	2.00	33.00	
<b>Seed</b>					
Seed	Thou.	3.60	69.70	250.92	
<b>Fertilizer</b>					
Manure/Compost (1/4 cost/crop)	Ton	40.00	0.75	30.00	
15-15-15	Lb.	0.173	400.00	69.20	
AN20 (10.6 Lb/Gal.)	Lb.N	0.665	160.00	106.40	
<b>Insecticide</b>					
Diazinon 14G	Lb.	2.49	1.75	4.36	
MSR Spray Concentrate	Pint	13.26	4.00	53.04	
Lannate 90 SP	Lb.	29.19	1.00	29.19	
Success	Fl.oz.	6.60	4.00	26.40	
<b>Herbicide</b>					
Dacthal	Lb.	18.86	2.00	37.72	
<b>Irrigation</b>					
Water	Ac. Ft.	435.00	2.00	870.00	
Labor (Machine)	Hour	13.84	3.29	45.53	
Labor (Non-Machine)	Hour	10.35	14.45	149.56	
Fuel - Gas	Gal.	2.25	0.66	1.49	
Fuel - Diesel	Gal.	2.00	32.93	65.86	
Lube	Acre	7.00	1.00	7.00	
Machinery Repair	Acre	17.00	1.00	17.00	
Interest on Operating Capital	Acre	238.95	1.00	238.95	
<b>TOTAL OPERATING COSTS</b>					6,486.12
<b>CASH OVERHEAD COSTS</b>					
Liability Insurance	Acre	1.00	1.00	1.00	
Office Expenses	Acre	50.00	1.00	50.00	
Field Sanitation	Acre	2.00	1.00	2.00	
Property Taxes	Acre	3.00	1.00	3.00	
Property Insurance	Acre	2.00	1.00	2.00	
Investment Repairs	Acre	5.00	1.00	5.00	

**Crop Enterprise Budget  
Irrigated Fresh Market Broccoli  
Goleta Valley Agricultural Viability Analysis**

ITEM	UNIT	PRICE	QUANTITY	AMOUNT PER ACRE
<b>TOTAL CASH OVERHEAD COSTS</b>				63.00
<b>NON-CASH OVERHEAD COSTS (Capital Recovery)</b>				
Farm Rent	Acre	2,222.00	1.00	2,222.00
Shop Building	Acre	7.00	1.00	7.00
Shop Tools	Acre	1.00	1.00	1.00
Implement Carrier	Acre	1.00	1.00	1.00
Fuel Tanks & Pumps	Acre	1.00	1.00	1.00
Pipe-Gated 8"	Acre	1.00	1.00	1.00
Trailer- Lowbed	Acre	1.00	1.00	1.00
Trailer- Pipe (2)	Acre	1.00	1.00	1.00
Truck Trailer	Acre	4.00	1.00	4.00
Forklift- 5000 Lb.	Acre	2.00	1.00	2.00
Equipment	Acre	29.00	1.00	29.00
<b>TOTAL NON-CASH OVERHEAD COSTS</b>				2,270.00
<b>TOTAL COSTS</b>				8,819.12
<b>NET FARM INCOME</b>				<b>\$ (3,499.12)</b>

Source: Sample Costs to Produce Fresh Market Broccoli, University of California Extension, 2004.  
The net farm income represents a return to management and risk.

**Crop Enterprise Budget  
Irrigated Organic Broccoli  
Goleta Valley Agricultural Viability Analysis**

ITEM	UNIT	PRICE	QUANTITY	AMOUNT PER ACRE	
		Dollars		Dollars	Dollars
<b>INCOME</b>					
Organic Broccoli	Box	10.00	650.00	6,500.00	
TOTAL INCOME					6,500.00
<b>OPERATING COSTS</b>					
Fertilizer/Soil Amendments					
Compost-Manure (Haul/Spread)	Ton	40.00	2.50	100.00	
Gypsum	Ton	38.50	0.50	19.25	
8-5-1 Meat & Bone (List Beds/Fertilize)	Lb.	0.33	800.00	264.00	
13-0-0 Bloodmeal	Lb.	0.45	500.00	225.00	
Seed					
Cover Crop (Cereal-Legume Mix)	Lb.	0.35	35.00	12.25	
Broccoli Hybrid (Organic)	Thou.	7.50	58.90	441.75	
Alyssum	Lb.	13.00	0.05	0.65	
Irrigation					
Water	Ac. Ft.	435.00	2.00	870.00	
Insecticide					
Entrust	Oz.	3.43	2.00	6.86	
Assessment					
CCOF Total Fees	Acre	25.00	1.00	25.00	
Contract					
Ground Application (Insect)	Acre	16.00	1.00	16.00	
Pest Management Consultant	Acre	30.00	1.00	30.00	
Harvest (Box, Pick, Haul, Supervision)	Box	3.90	650.00	2,535.00	
Harvest (Pelletize, Cool)	Box	1.90	650.00	1,235.00	
Harvest (Sell 8% of \$10)	Box	0.80	650.00	520.00	
Labor (Machine)	Hour	13.84	5.87	81.24	
Labor (Non-Machine)	Hour	10.35	28.95	299.63	
Fuel - Gas	Gal.	2.25	5.95	13.39	
Fuel - Diesel	Gal.	2.00	43.40	86.80	
Lube	Acre	11.00	1.00	11.00	
Machinery Repair	Acre	25.00	1.00	25.00	
Interest on Operating Capital	Acre	260.78	1.00	260.78	
TOTAL OPERATING COSTS					7,078.60
<b>CASH OVERHEAD COSTS</b>					
Liability Insurance	Acre	4.00	1.00	4.00	
Office Expenses	Acre	100.00	1.00	100.00	
Field Sanitation	Acre	1.00	1.00	1.00	
Property Taxes	Acre	5.00	1.00	5.00	
Property Insurance	Acre	3.00	1.00	3.00	
investment Expenses	Acre	10.00	1.00	10.00	
TOTAL CASH OVERHEAD COSTS					123.00

**Crop Enterprise Budget  
Irrigated Organic Broccoli  
Goleta Valley Agricultural Viability Analysis**

ITEM	UNIT	PRICE	QUANTITY	AMOUNT PER ACRE
<b>NON-CASH OVERHEAD COSTS (Capital Recovery)</b>				
Farm Rent	Acre	2,222.00	1.00	2,222.00
Buildings, 2400 Sq. Ft.	Acre	22.00	1.00	22.00
Shop Tools	Acre	6.00	1.00	6.00
Fuel Tanks OH 2-300g	Acre	1.00	1.00	1.00
Sprinkler Pipe 1,456'	Acre	6.00	1.00	6.00
Trailer- Pipe (2)	Acre	4.00		
Equipment	Acre	49.00	1.00	49.00
<b>TOTAL NON-CASH OVERHEAD COSTS</b>				2,306.00
<b>TOTAL COSTS</b>				9,507.60
<b>NET FARM INCOME</b>				<b>\$ (3,007.60)</b>

Source: Sample Costs to Produce Organic Broccoli, University of California Extension, 2004.  
The net farm income represents a return to management and risk.

**Crop Enterprise Budget  
Irrigated Avocado  
Goleta Valley Agricultural Viability Analysis**

ITEM	UNIT	PRICE	QUANTITY	AMOUNT PER ACRE	
		Dollars		Dollars	Dollars
<b>INCOME</b>					
Avocado	Lb.	0.89	7,500.00	6,675.00	
TOTAL INCOME					6,675.00
<b>OPERATING COSTS</b>					
Herbicide					
Roundup (3x)	Pint	6.50	1.00	6.50	
Rent					
Bee Hives	Hive	35.00	2.00	70.00	
Miscellaneous					
Erosion Control	Acre	5.00	1.00	5.00	
Harvest, Market, and Inspection					
Pick (3x)	Lb.	0.080	7,500.00	600.00	
Haul (3x)	Lb.	0.004	7,500.00	30.00	
CAC Assessment (3x)	Lb.	0.035	7,500.00	262.50	
CDFA Inspection (3x)	Lb.	0.001	7,500.00	7.50	
Pest Management					
VeratranD Air Spray (3x)	Acre	225.00	1.00	225.00	
Oil Air Spray (3x)	Acre	65.00	1.00	65.00	
Pest Control Advisor	Acre	60.00	1.00	60.00	
Fertilize					
Zinc Sulfate 12% (1x)	Gal.	1.51	5.00	7.55	
UN32 (7x)	Gal.	1.52	26.46	40.22	
Irrigation					
Water	Ac. Ft.	435.00	2.00	870.00	
Rodenticide					
Squirrel Bait (12x)	Lb.	2.32	2.64	6.12	
Bait Station	Acre	2.30	1.00	2.30	
Labor (Machine)	Hour	12.00	4.80	57.60	
Labor (Non-Machine)	Hour	10.35	31.45	325.51	
Fuel - Gas	Gal.	1.45	5.76	8.35	
Lube	Acre	1.00	1.00	1.00	
Machinery Repair	Acre	6.00	1.00	6.00	
Interest on Operating Capital	Acre	101.60	1.00	101.60	
TOTAL OPERATING COSTS					2,757.75
<b>CASH OVERHEAD COSTS</b>					
Liability Insurance	Acre	37.00	1.00	37.00	
Root Rot Analysis	Acre	3.00	1.00	3.00	
Leaf Analysis	Acre	5.00	1.00	5.00	
Soil Analysis	Acre	5.00	1.00	5.00	
Sanitation Fee	Acre	44.00	1.00	44.00	
Office Expenses	Acre	180.00	1.00	180.00	
Property Taxes	Acre	246.00	1.00	246.00	
Property Insurance	Acre	60.00	1.00	60.00	
Investment Repairs	Acre	84.00	1.00	84.00	
Interest on Operating Capital	Acre	28.22	1.00	28.22	
TOTAL CASH OVERHEAD COSTS					692.22

**Crop Enterprise Budget  
Irrigated Avocado  
Goleta Valley Agricultural Viability Analysis**

ITEM	UNIT	PRICE	QUANTITY	AMOUNT PER ACRE
NON-CASH OVERHEAD COSTS (Capital Recovery)				
Farm Rent	Acre	2,222.00	1.00	2,222.00
Building	Acre	73.00	1.00	73.00
Shop Tools	Acre	6.00	1.00	6.00
Tools (Shovels, Picking Bags, Saws, etc.)	Acre	20.00	1.00	20.00
Equipment	Acre	5.00	1.00	5.00
Amortized Establishment Cos	Acre	1,130.00	1.00	<u>1,130.00</u>
TOTAL NON-CASH OVERHEAD COSTS				3,456.00
TOTAL COSTS				6,905.97
<b>NET FARM INCOME</b>				<b>\$ (230.97)</b>

Source: Avocado Sample Establishment and Production Costs and Profitability Analysis for Ventura and Santa Barbara Counties, University of California Cooperative Extension, 2001.  
The net farm income represents a return to management and risk.

**Crop Enterprise Budget  
Irrigated Fresh Market Cauliflower  
Goleta Valley Agricultural Viability Analysis**

ITEM	UNIT	PRICE	QUANTITY	AMOUNT PER ACRE	
		Dollars		Dollars	Dollars
<b>INCOME</b>					
Cauliflower 25 Lbs./Box	Box	7.77	680.00	5,283.60	
TOTAL INCOME					5,283.60
<b>OPERATING COSTS</b>					
Custom					
Haul Manure	Lb.	0.003	1,500.00	4.50	
Spread Manure	Lb.	0.004	1,500.00	6.00	
List/Fertilize	Acre	11.00	1.00	11.00	
Ground Application- Pesticide	Acre	15.75	3.00	47.25	
Transplant Cauliflower	Thous.	10.00	13.07	130.70	
Ground Application- AN20	Acre	9.50	3.00	28.50	
Contract					
Hauling	Box	0.30	680.00	204.00	
Harvest	Box	1.90	680.00	1,292.00	
Cool Vegetables	Box	0.65	680.00	442.00	
Pelletize Vegetables	Box	0.20	680.00	136.00	
Sell Vegetables	Box	0.50	689.00	344.50	
Irrigation					
Water	Ac. Ft.	435.00	2.00	870.00	
Fertilizer					
Manure/Compost	Ton	40.000	0.75	30.00	
15-15-15	Lb.	0.170	400.00	68.00	
AN20 (10.6#/Gal.)	Lb.N	0.52	240.00	124.80	
Herbicide					
Goal 2XL	Pint	14.60	0.13	1.90	
Insecticide					
Lorsban 14G	Lb.	2.80	7.00	19.60	
Metasystox-R	Pint	10.18	4.00	40.72	
Lannate 90 SP	Lb.	26.05	1.00	26.05	
Seed					
Seed	Thous.	5.25	16.33	85.73	
Transplant Seedlings	Thous.	14.00	14.52	203.28	
Rubber Bands	Thous.	2.08	9.17	19.07	
Packing Box	Boz	1.15	680.00	782.00	
Labor (Machine)	Hour	11.73	4.13	48.44	
Labor (Non-Machine)	Hour	10.35	32.56	337.00	
Fuel - Gas	Gal.	2.25	1.39	3.13	
Fuel - Diesel	Gal.	2.00	40.31	80.62	
Lube	Acre	8.00	1.00	8.00	
Machinery Repair	Acre	18.00	1.00	18.00	
Interest on Operating Capital	Acre	207.04	1.00	207.04	
TOTAL OPERATING COSTS					5,619.83

**Crop Enterprise Budget  
Irrigated Fresh Market Cauliflower  
Goleta Valley Agricultural Viability Analysis**

ITEM	UNIT	PRICE	QUANTITY	AMOUNT PER ACRE	
<b>CASH OVERHEAD COSTS</b>					
Liability Insurance	Acre	1.00	1.00	1.00	
Office Expenses	Acre	50.00	1.00	50.00	
Field Sanitation	Acre	9.00	1.00	9.00	
Property Taxes	Acre	3.00	1.00	3.00	
Property Insurance	Acre	2.00	1.00	2.00	
investment Repairs	Acre	3.00	1.00	3.00	
<b>TOTAL CASH OVERHEAD COSTS</b>					68.00
<b>NON-CASH OVERHEAD COSTS (Capital Recovery)</b>					
Farm Rent	Acre	2,222.00	1.00	2,222.00	
Shop Building	Acre	8.00	1.00	8.00	
Shop Tools	Acre	1.00	1.00	1.00	
Fuel Wagon	Acre	-	1.00	-	?
Implement Carrier	Acre	1.00	1.00	1.00	
Fuel Tanks & Pumps	Acre	1.00	1.00	1.00	
Trailer- Lowbed	Acre	1.00	1.00	1.00	
Trailer- Pipe #1	Acre	-	1.00	-	
Trailer- Pipe #2	Acre	-	1.00	-	
Truck Tractor	Acre	4.00	1.00	4.00	
Forklift- 5000 Lb.	Acre	1.00	1.00	1.00	
Equipment	Acre	383.00	1.00	383.00	
<b>TOTAL NON-CASH OVERHEAD COSTS</b>					2,622.00
<b>TOTAL COSTS</b>					8,309.83
<b>NET FARM INCOME</b>					<b>\$ (3,026.23)</b>

Source: Sample Costs to Produce Fresh Market Cauliflower, University of California Extension, 2001.

The net farm income represents a return to management and risk.



**Crop Enterprise Budget  
Irrigated Iceberg Lettuce  
Goleta Valley Agricultural Viability Analysis**

ITEM	UNIT	PRICE	QUANTITY	AMOUNT PER ACRE	
		Dollars		Dollars	Dollars
<b>INCOME</b>					
Lettuce 50 Lbs./Carton	Carton	8.90	700.00	6,230.00	
<b>TOTAL INCOME</b>					6,230.00
<b>LAND PREPERATION</b>					
Stubble Disc/Ring Roller	Acre	24.50	1.00	24.50	
Subsoil 2nd Gear	Acre	45.00	1.00	45.00	
Disc (2x)	Acre	13.00	2.00	26.00	
Triplane	Acre	12.00	1.00	12.00	
Border, Cross Check & Break Borders	Acre	23.75	1.00	23.75	
<b>Flood</b>					
Water	Ac.Ft.	435.00	1.00	435.00	
Hand Labor	Hour	10.35	1.00	10.35	
Disc (2x)	Acre	13.00	2.00	26.00	
Triplane	Acre	12.00	1.00	12.00	
<b>Fertilizer</b>					
Spread Fertilizer	Acre	8.00	1.00	8.00	
11-52-0	Lb.	0.15	500.00	75.00	
List 40"x42" Beds	Acre	16.50	1.00	16.50	
<b>TOTAL LAND PREPARATION COSTS</b>					714.10
<b>GROWING PERIOD</b>					
Power Mulch Beds	Acre	27.50	1.00	27.50	
Precision Plant & Inject Insecticide	Acre	22.00	1.00	22.00	
Coated Seed 157M	Acre	150.000	1.00	150.00	
Admire	Acre	60.000	1.00	60.00	
<b>Weed Control/Chemigation</b>					
Herbicide	Acre	35.00	1.00	35.00	
Thin	Hour	9.95	13.00	129.35	
Cultivate (1x)	Acre	14.00	1.00	14.00	
Spike (2x)	Acre	11.00	2.00	22.00	
Fertilize & Furrow Out (2x)	Acre	14.50	2.00	29.00	
N/UAN 32	Lb.	0.38	120.00	45.60	
<b>Water-Run Fertilizer</b>					
N/UAN 32	Lb.	0.38	60.00	22.80	
Hand Weed (2x)	Hour	9.95	10.00	99.50	
Irrigate (4x)	Hour	10.35	2.50	25.88	
Water	Ac.Ft.	435.00	2.00	870.00	
Insect Control (6x)	Acre	10.00	6.00	60.00	
Insecticides	Acre	150.00	1.00	150.00	
Disease Control (1x)	Acre	11.50	1.00	11.50	
Fungicide	Acre	10.00	1.00	10.00	
Ring Roller Cleanup	Acre	7.50	1.00	7.50	
<b>TOTAL GROWING PERIOD COSTS</b>					1,791.63

**Crop Enterprise Budget  
Irrigated Iceberg Lettuce  
Goleta Valley Agricultural Viability Analysis**

ITEM	UNIT	PRICE	QUANTITY	AMOUNT PER ACRE
Farm Rent	Acre	2,222.00	1.00	2,222.00
Cash Overhead	Acre	614.60	1.00	614.60
<b>TOTAL PREHARVEST COSTS</b>				<b>5,342.33</b>
<b>HARVEST COSTS</b>				
Cut, Pack, Haul, Cool, & Sell	Carton	5.25	700.00	<u>3,675.00</u>
<b>TOTAL HARVEST COSTS</b>				<b>3,675.00</b>
<b>TOTAL COSTS</b>				<b>9,017.33</b>
<b>NET FARM INCOME</b>				<b>\$ (2,787.33)</b>

Source: Sample Costs to Establish and Produce Iceberg Lettuce, University of California Extension, 2004.

Carton of lettuce weighs 50 pounds.

Cash Overhead is calculated as 13% of preharvest costs and land rent.

The net farm income represents a return to management and risk.

**Crop Enterprise Budget  
Irrigated Fresh Market Strawberries  
Goleta Valley Agricultural Viability Analysis**

ITEM	UNIT	PRICE	QUANTITY	AMOUNT PER ACRE	
		Dollars		Dollars	Dollars
<b>INCOME</b>					
Strawberries (9.5 Lb./Tray)	Cwt	65.89	522.50	34,427.53	
<b>TOTAL INCOME</b>					<b>34,427.53</b>
<b>OPERATING COSTS</b>					
<b>Irrigation</b>					
Water	Ac. Ft.	435.00	2.00	870.00	
<b>Fertilizer</b>					
Scotts 18-8-13	Lb.	0.55	500.00	275.00	
CAN 17 (17-0-0-8Ca)	Lb.	1.20	12.00	14.40	
<b>Materials</b>					
T-Tape	ft.	0.02	20,120.00	402.40	
Mulch Pins	Each	0.01	4,000.00	40.00	
Mulch 1.25m	Lb.	0.86	350.00	301.00	
Tray Container	Each	1.55	5,500.00	8,525.00	
Dump Fee	Lb.	0.03	600.00	18.00	
Strawberry Plants	Each	0.07	21,110.00	1,477.70	
<b>Fungicide</b>					
Captan 50W	Lb.	4.05	12.00	48.60	
Rally 40W	Oz.	4.90	15.00	73.50	
Quadris	floz.	3.18	36.00	114.48	
Elevate 50WGD	Lb.	43.45	3.00	130.35	
Thiolux	Lb.	0.90	20.00	18.00	
<b>Insecticide</b>					
Savey 50 DF	Oz.	20.69	6.00	124.14	
Dipel DF	Lb.	13.55	2.00	27.10	
Dibrom 8 Emulsive	floz.	0.81	16.00	12.96	
Success	floz.	6.60	5.00	33.00	
Acramite 50WS	Lb.	87.69	2.00	175.38	
Malathion 8	Pt.	4.96	4.00	19.84	
Danitol	floz.	1.62	16.00	25.92	
<b>Predatory Mites</b>					
Persimillis	thou	6.50	40.00	260.00	
<b>Assessment</b>					
Strawberry Commission	tray	0.05	5,500.00	247.50	
<b>Contract</b>					
Fumigate- Solid	Acre	1,650.00	1.00	1,650.00	
Fumigation Tarp Retr/Disp.	Acre	65.00	1.00	65.00	
Labor (Machine)	Hour	12.73	34.00	432.82	
Labor (Non-Machine)	Hour	10.35	1,187.65	12,292.18	
Fuel - Gas	Gal.	2.25	36.95	83.14	
Fuel - Diesel	Gal.	2.00	95.36	190.72	
Lube	Acre	31.00	1.00	31.00	
Machinery Repair	Acre	58.00	1.00	58.00	
Interest on Operating Capital	Acre	1,072.42	1.00	<u>1,072.42</u>	

**Crop Enterprise Budget  
Irrigated Fresh Market Strawberries  
Goleta Valley Agricultural Viability Analysis**

ITEM	UNIT	PRICE	QUANTITY	AMOUNT PER ACRE
<b>TOTAL OPERATING COSTS</b>				29,109.55
<b>CASH OVERHEAD COSTS</b>				
Liability Insurance	Acre	11.00	1.00	11.00
Office Expenses	Acre	700.00	1.00	700.00
Sanitation Fee	Acre	100.00	1.00	100.00
Ranch Supervisor	Acre	500.00	1.00	500.00
Property Taxes	Acre	31.00	1.00	31.00
Property Insurance	Acre	21.00	1.00	21.00
investment Expenses	Acre	36.00	1.00	36.00
<b>TOTAL CASH OVERHEAD COSTS</b>				1,399.00
<b>NON-CASH OVERHEAD COSTS (Capital Recovery)</b>				
Farm Rent	Acre	2,222.00	1.00	2,222.00
Buildings	Acre	97.00	1.00	97.00
Hand Tools	Acre	10.00	1.00	10.00
Shop Tools	Acre	28.00	1.00	28.00
Harvest Csrts 70	Acre	6.00	1.00	6.00
Fuel Tanks/Above Ground	Acre	7.00	1.00	7.00
Equipment	Acre	383.00	1.00	383.00
<b>TOTAL NON-CASH OVERHEAD COSTS</b>				2,753.00
<b>TOTAL COSTS</b>				33,261.55
<b>NET FARM INCOME</b>				<b>\$ 1,165.98</b>

Source: Sample Costs to Produce Strawberries, University of California Extension, 2004.  
The net farm income represents a return to management and risk.

**Crop Enterprise Budget  
Irrigated Fresh Market Raspberries  
Goleta Valley Agricultural Viability Analysis**

ITEM	UNIT	PRICE	QUANTITY	AMOUNT PER ACRE	
		Dollars		Dollars	Dollars
<b>INCOME</b>					
Raspberries (7 Lb./Flat)	Flat	12.00	3,000.00	36,000.00	
<b>TOTAL INCOME</b>					36,000.00
<b>OPERATING COSTS</b>					
Custom					
Bee Hives	Each	30.00	2.00	60.00	
Leaf Analysis	Each	75.00	0.07	5.25	
Pest Control Advisor (PCA)/Consultant	Acre	100.00	1.00	100.00	
Irrigation					
Water	Ac. Ft.	435.00	2.00	870.00	
Fertilizer					
15-10-30	Lb.	0.58	600.00	348.00	
Fungicide					
Elevate 50 WDG	Lb.	35.86	4.50	161.37	
Kocide DF (Copper Sulfate)	Lb.	3.31	10.00	33.10	
Insecticide					
Savey 50 WP	Oz.	20.69	6.00	124.14	
Harvest					
Labor- Picking (Piece Rate)	Flat	4.00	3,000.00	12,000.00	
Flat with 12 One-half Pint Clamshells	Each	1.73	3,000.00	5,190.00	
Buckets for Picking	Each	2.50	10.00	25.00	
Cooling	Each	0.85	3,000.00	2,550.00	
Labor (Machine)	Hour	15.87	35.89	569.57	
Labor (Non-Machine)	Hour	10.35	148.00	1,531.80	
Fuel - Gas	Gal.	2.25	63.54	142.97	
Fuel - Diesel	Gal.	2.00	19.56	39.12	
Lube	Acre	27.00	1.00	27.00	
Machinery Repair	Acre	71.00	1.00	71.00	
Interest on Operating Capital	Acre	912.20	1.00	912.20	
<b>TOTAL OPERATING COSTS</b>					24,760.52
<b>CASH OVERHEAD COSTS</b>					
Liability Insurance	Acre	20.00	1.00	20.00	
Office Expenses	Acre	300.00	1.00	300.00	
Sanitation Fee	Acre	114.00	1.00	114.00	
Food Safety Audit	Acre	28.00	1.00	28.00	
Property Taxes	Acre	41.00	1.00	41.00	
Property Insurance	Acre	48.00	1.00	48.00	
investment Expenses	Acre	95.00	1.00	95.00	
<b>TOTAL CASH OVERHEAD COSTS</b>					646.00

**Crop Enterprise Budget  
Irrigated Fresh Market Raspberries  
Goleta Valley Agricultural Viability Analysis**

ITEM	UNIT	PRICE	QUANTITY	AMOUNT PER ACRE
<b>NON-CASH OVERHEAD COSTS (Capital Recovery)</b>				
Farm Rent	Acre	2,222.00	1.00	2,222.00
Buildings	Acre	132.00	1.00	132.00
Trellis	Acre	30.00	1.00	30.00
Shop/Hand Tools	Acre	46.00	1.00	46.00
Raspberry Establishment	Acre	3,201.00	1.00	3,201.00
Equipment	Acre	317.00	1.00	317.00
<b>TOTAL NON-CASH OVERHEAD COSTS</b>				5,948.00
<b>TOTAL COSTS</b>				31,354.52
<b>NET FARM INCOME</b>				<b>\$ 4,645.48</b>

Source: Sample Costs to Produce Fresh Market Raspberries, University of California Extension, 2005.  
The land rent is \$2,000 per acre or \$2,222 per producing acre.  
The net farm income represents a return to management and risk.

**Crop Enterprise Budget**  
**Irrigated Fresh Market Blueberries**  
**Goleta Valley Agricultural Viability Analysis**

ITEM	UNIT	PRICE	QUANTITY	AMOUNT PER ACRE	
		Dollars		Dollars	Dollars
<b>INCOME</b>					
Blueberries	Lb.	1.23	19,800.00	24,354.00	
TOTAL INCOME					24,354.00
<b>OPERATING COSTS</b>					
Custom					
Bee Hives	Each	25.00	2.00	50.00	
Herbicide					
Devrinol 2E	Gal.	55.29	2.00	110.58	
Surflan 4 AS	Pint	11.98	4.00	47.92	
Fertilizer					
UN- 32	Lbs. N	0.440	100.00	44.00	
Irrigation					
Water	Ac. Ft.	435.00	2.00	870.00	
Soil Amendment					
Sulfuric Acid	Gal.	1.16	70.00	81.20	
Mulch, Woodchips	Cu. Yd.	4.33	20.00	86.60	
Insecticide					
Success	Fl. Oz.	6.60	12.00	79.20	
Fungicide					
Rovral	Gal.	137.84	0.19	26.19	
Bird Control					
Propane Gas Tank	Each	25.00	0.20	5.00	
Flash Tape	Each	4.75	17.00	80.75	
Bird Bombs	Each	0.39	30.00	11.70	
Harvest					
Buckets	Each	2.50	10.00	25.00	
Labor- Picking (Piece Rate)	Flat	7.50	1,800.00	13,500.00	
Packing, Cooling	Flat	0.85	1,800.00	1,530.00	
N.A. Blueberry Council Fee	Tons	12.00	9.90	118.80	
Labor (Machine)	Hour	14.07	24.97	351.33	
Labor (Non-Machine)	Hour	10.35	111.00	1,148.85	
Fuel - Gas	Gal.	2.25	35.82	80.60	
Fuel - Diesel	Gal.	2.00	8.60	17.20	
Lube	Acre	11.00	1.00	11.00	
Machinery Repair	Acre	41.00	1.00	41.00	
Interest on Operating Capital	Acre	700.62	1.00	700.62	
TOTAL OPERATING COSTS					19,017.53
<b>CASH OVERHEAD COSTS</b>					
Liability Insurance	Acre	20.00	1.00	20.00	
Office Expenses	Acre	500.00	1.00	500.00	
Sanitation Fee	Acre	114.00	1.00	114.00	
Food Safety Audit	Acre	28.00	1.00	28.00	
Property Taxes	Acre	41.00	1.00	41.00	
Property Insurance	Acre	48.00	1.00	48.00	
Investment Repairs	Acre	71.00	1.00	71.00	
TOTAL CASH OVERHEAD COSTS					822.00

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**Crop Enterprise Budget  
Irrigated Fresh Market Blueberries  
Goleta Valley Agricultural Viability Analysis**

ITEM	UNIT	PRICE	QUANTITY	AMOUNT PER ACRE
<b>NON-CASH OVERHEAD COSTS (Capital Recovery)</b>				
Farm Rent	Acre	2,222.00	1.00	2,222.00
Buildings	Acre	63.00	1.00	63.00
Sulfuric Acid Pump & Tank	Acre	19.00	1.00	19.00
Shop/Hand Tools	Acre	18.00	1.00	18.00
Crates	Acre	32.00	1.00	32.00
Blueberry Establishment	Acre	1,342.00	1.00	1,342.00
Propane Cannons	Acre	9.00	1.00	9.00
Equipment	Acre	123.00	1.00	123.00
<b>TOTAL NON-CASH OVERHEAD COSTS</b>				3,828.00
<b>TOTAL COSTS</b>				23,667.53
<b>NET FARM INCOME</b>				<b>\$ 686.47</b>

Source: Sample Costs to Produce Fresh Market Blueberries, University of California Extension, 2002.  
The farm rent is \$2,000 per acre or \$2,222 per producing acre.  
The net farm income represents a return to management and risk.



**Response to Comment No. B.11-1**

The commentator advises that they are submitting comments on the Goleta GP/CLUP, and that separate letters will be submitted by other identified parties. Comment noted. No other response is required.

**Response to Comment No. B.11-2**

The commentator has requested that the prime farmland designations be revised in the FEIR. The City acknowledges the “Goleta Valley Agricultural Viability Analysis” prepared by CH2MHILL in July 2006 on behalf of the Goleta Valley Chamber of Commerce. The comment does not specifically identify the “errors and/or faulty assertions” in the EIR and the GP/CLUP.

The GP/CLUP does not designate sites as prime farmland. The GP/CLUP calls for the preservation of agricultural land, which is based on the existing use of the properties, and does not specify whether or not it must be prime. The criteria for designating agriculture land are provided in the Land Use Element under policy subsection LU 7.3. The designation of prime farmland for certain properties has been assigned by the State Department of Conservation’s FMMP. The lack of active farming in the past four years is irrelevant with respect to the City’s designation of Agriculture land. The requirement that a property must have been actively farmed for four years is related to the state’s classification of prime farmland at the time of mapping under the FMMP.

**Response to Comment No. B.11-3**

The commentator has requested that the EIR address the potential negative environmental impacts of the No Project Alternative. The potential environmental impacts associated with the No Project Alternative are presented in Section 5.4 of the DEIR. Potential population and housing impacts associated with the No Project Alternative are discussed in Section 5.4.8.1 of the DEIR.

**Response to Comment No. B.11-4**

See response to comment B.2-4.

**Response to Comment No. B.11-5**

See response to comment B.10-12.

**Response to Comment No. B.11-6**

The commentator has provided the Department of Conservation definition of unique farmland as land that has been “used for the production of specific high economic value crops at some time during the two update cycles prior to the mapping date.” The City acknowledges the definition of Unique Farmland when mapping sites under the FMMP. Based upon the designation of some sites as Unique Farmland, it can be assumed that the sites were in fact used for the production of high economic value crops during the two update cycles prior to the mapping date. The City has not designated the sites as Unique Farmland, but has merely presented the data from the State FMMP for each of the agriculture sites in the City of Goleta.

**Response to Comment No. B.11-7**

The commentator has correctly observed that the DEIR incorrectly states the tax benefits associated with Williamson Act evaluation. This item has been corrected in Section 3.2.1.1 of the FEIR.

**Response to Comment No. B.11-8**

The commentator has correctly observed that text is missing from page 3.2-2. This item has been corrected in Section 3.2.1.1 of the FEIR.

**Response to Comment No. B.11-9**

The commentator has correctly observed that the statement in DEIR Section 3.2.1.2 regarding the rate of growth in Goleta has not been substantiated. The sentence has been deleted in the FEIR.

**Response to Comment No. B.11-10**

Consistent with the description included in DEIR Section 3.2.1.3, the commentator correctly notes that the site referred to as Bishop Ranch contains three parcels. The commentator suggests that the three parcels be described separately in the EIR. The three parcels are grouped together in the EIR text because they are adjoining. The program-level GP/CLUP document does not review land use designations on a parcel-by-parcel basis. The purpose of the EIR is to identify and, when possible, mitigate potentially significant environmental effects, which generally relate to physical changes to the environment. Therefore, the analysis correctly combines adjoining parcels comprising "Bishop Ranch" and evaluates the impacts of the proposed plan buildout. The fact that the plan does not allow development on the vacant sites comprising what is referred to in the EIR as "Bishop Ranch" in fact reduces potential agriculture impacts. Separating out the three parcels as requested by the commentator would not change the analysis or the conclusions in the EIR.

**Response to Comment No. B.11-11**

See response to comment B.10-13.

**Response to Comment No. B.11-12**

The commentator has requested clarification of the statement that there are no Williamson Act contract lands located in the Goleta urban area. This item has been corrected in Section 3.2.1.3 of the FEIR to state that there are no Williamson Act lands in the City of Goleta.

**Response to Comment No. B.11-13**

The commentator has requested clarification of the definition of "intensified" in the third paragraph of Section 3.2.1.3. The word has been deleted from the FEIR.

**Response to Comment No. B.11-14**

The commentator has correctly observed that the acreage numbers in Table 3.2.2 and the accompanying text are inconsistent. The acreage numbers in FEIR Table 3.2-2 have been modified for consistency.

**Response to Comment No. B.11-15**

The commentator has requested that the EIR contain definitions of the classes of soils and how those designations relate to the soils' suitability for agricultural uses. The text of FEIR Section 3.2.1.3 has been modified to define soil classes and to explain how they relate to the soils' suitability.

**Response to Comment No. B.11-16**

The commentator has correctly observed that the last sentence of the first paragraph regarding Bishop Ranch, in Section 3.2.1.3, is irrelevant to the impact analysis. This sentence has been deleted from the FEIR.

**Response to Comment No. B.11-17**

The commentator has correctly observed that the word "has," in the first sentence of the second paragraph regarding Bishop Ranch, in Section 3.2.1.3, implies continuing agricultural activities at Bishop Ranch. The word "has" has been stricken from the paragraph.

**Response to Comment No. B.11-18**

The commentator requests that the EIR contain a description of the length of time that fallow agriculture sites, specifically the center parcel comprising the Bishop Ranch, have been out of active production. In response, the fact that an agriculture site is fallow, or the length of time that it is/was fallow, is irrelevant to the EIR analysis. The term agriculture is defined in Section 3.2 of the EIR, and the three Bishop Ranch parcels clearly meet the criteria established by the definition. The length of time that a property is/was fallow is not part of the criteria for the identification of agriculture sites. As such, providing the requested detail regarding the status of individual fields in a programmatic EIR is unnecessary and would not change the analysis or the conclusions in the EIR.

**Response to Comment No. B.11-19**

The commentator has asked for clarification regarding the classifications of Sites 9 and 10 in Section 3.2.1.3 of the EIR. The City has not designated any of the sites as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland, which are the only categories considered. The farmland categories are assigned by the State FMMP, and the EIR merely presents the data from the State FMMP for each of the agriculture sites in the City of Goleta.

**Response to Comment No. B.11-20**

The commentator has requested clarification for the discussion of agricultural viability in Section 3.2.1.3 of the EIR. The discussion regarding agricultural viability has been stricken from the EIR, since it is not relevant to the impact analysis. The impact analysis is based on conversion of existing agricultural lands that are classified as Important Farmland, as designated by the State

Department of Conservation Farmland Mapping and Monitoring program. The agriculture threshold under CEQA relates to physical environmental resources rather than economics, which is a factor of viability. This differentiation is in keeping with CEQA's emphasis on physical environmental impacts and not social or economic impacts (State CEQA Guidelines Section 15131). Economics is considered primarily a planning issue and is not addressed in the EIR.

#### **Response to Comment No. B.11-21**

The commentator has correctly observed that the Farmland Protection Policy Act is not applicable to local actions, such as the preparation of a general plan. This paragraph has been removed from Section 3.2.2.1 of the FEIR because it is not relevant to the analysis.

#### **Response to Comment No. B.11-22**

The commentator has requested clarification regarding the relevance of the County of Santa Barbara's Agricultural Preserve Uniform Rules, presented under the Williamson Act discussion in Section 3.2.2.1 of the EIR. These rules are relevant because the Williamson Act is administered by the County and not local municipal jurisdictions. Therefore, should any of the properties within the City of Goleta apply for Williamson Act status, this program would be administered by the County of Santa Barbara. The text of EIR Section 3.2.2.1 has been expanded to explain this.

#### **Response to Comment No. B.11-23**

The commentator suggests that the discussion of the California Coastal Act in Section 3.2.2.1 may not be relevant. The commentator is correct that none of the agricultural properties currently fall within the Coastal Zone. However, the Coastal Act may be relevant in the future for potential future agricultural operations. Text has been added to Section 3.2.2.1 of the FEIR to indicate that none of the current agricultural properties are located within the Coastal Zone.

#### **Response to Comment No. B.11-24**

The commentator has suggested that the California Agricultural Land Evaluation and Site Assessment Model (LESA) would be a more appropriate method of determining impacts. As Lead Agency under CEQA, the City of Goleta can choose the thresholds used to determine the significance of impacts and these thresholds are clearly identified in Section 3.2.3.1 and are based on the CEQA Guideline thresholds. No change is necessary.

The commentator also suggests that the GP/CLUP and EIR would benefit from a careful analysis of the parcels it proposes for preservation/conversion to ensure that it balances the benefits of agriculture with urban needs. In response, the City reminds the commentator that the subject document is an EIR and that the purpose of the EIR is to identify and, when possible, mitigate potentially significant environmental effects, which generally relate to physical changes to the environment. A parcel-by-parcel analysis of the benefits of agriculture in relation to urban needs is not the subject of this EIR. Section 15131 of the CEQA Guidelines states that "economic or social effects of a project shall not be treated as significant effects on the environment." As such, the EIR analysis correctly evaluates the impacts of the proposed plan buildout.

**Response to Comment No. B.11-25**

The commentator has correctly observed that the title of Section 3.2.3.2 should be “Discussion of Relevant GP/CLUP Policies.” The requested text has been added to the FEIR.

**Response to Comment No. B.11-26**

The commentator has requested clarification regarding the designation of Impact 3.2-1 as Class I. Impact 3.2-1 is classified as a significant and unavoidable impact (Class I) with implementation of the General Plan policies. Mitigation Measure 3.2-1 is suggested in addition to the General Plan policies, and it would in fact mitigate the impact to a less-than-significant level. However, the feasibility of this mitigation measure is dependent upon site-specific conditions associated with future project-level development. Therefore, Impact 3.2-1 would still be considered a significant and unavoidable impact unless it can be demonstrated that the mitigation measure is feasible for future site-specific, project-level development.

The discussion of the conversion of Class I and II soils is additive to the discussion of the conversion of prime and unique farmland. This information is provided for disclosure purposes. However, the impacts are based on the thresholds, which are related to the important farmland categories of prime, statewide importance, and unique.

The City has not designated any of the sites as prime farmland, farmland of statewide importance, or unique farmland, which are the only categories considered. The farmland categories are assigned by the State FMMP, and the EIR merely presents the data from the State FMMP for each of the agriculture sites in the City of Goleta.

**Response to Comment No. B.11-27**

The commentator has requested that the FEIR contain a discussion of where and why incompatible uses between agricultural lands and adjacent or nearby unincorporated lands would occur. This item has been added to the discussion under Impact 3.2-2. See response to comment A.7-4 for additional discussion on this matter. In addition, the FEIR indicates that Policy CE 11 would reduce this impact.

**Response to Comment No. B.11-28**

The commentator has correctly observed that impacts to workers are not impacts to agricultural resources. The discussion related to impacts to workers has been deleted from the Class III impact discussion in the FEIR. Additionally, the explanation regarding access and viability has been amended.

**Response to Comment No. B.11-29**

The commentator has asked why implementing GP/CLUP policies would not result in a beneficial impact. The requested text has been added to the Class IV impact discussion in the FEIR.

**Response to Comment No. B.11-30**

See response to comment B.11-26.

**Response to Comment No. B.11-31**

The commentator has correctly observed that Figures 3.2-1 and 3.2-2 are missing pointers to Site #4. Figures 3.2-1 and 3.2-2 have been modified to include a pointer to the site on the map for Future Service Area Agriculture Site #4.

**Response to Comment No. B.11-32**

See response to comment B.4-20.

**Response to Comment No. B.11-33**

See response to comment B.4-20.