



January 31, 2023

Mr. Mike Prater
Executive Officer
Santa Barbara Local Agency Formation Commission
Submitted via email to lafco@sblafco.org

Re: City of Lompoc SOI Amendment Proposal – Failure to Preserve Community Identity and Agricultural Viability

Dear Mr. Prater and Members of the Commission:

This comment is submitted by the Environmental Defense Center (“EDC”) on behalf of Santa Barbara County Action Network (“SBCAN”) to provide additional information to the Commission regarding the detrimental impact the City of Lompoc’s (the “City”) Sphere of Influence (“SOI”) Amendment proposal, Local Agency Formation Commission (“LAFCO”) File No. 22-07 (the “Proposal”), would have on the area’s unique community identity and agricultural viability.

I. LAFCO Policy and the Santa Barbara County Comprehensive Plan Require Preservation of Community Identity and Disfavor SOIs That “Cross-cut” Communities.

In addition to those policy inconsistencies described in EDC’s previous letters,¹ the City’s Proposal would violate LAFCO policy that states: “[s]phere of influence lines *shall* seek to preserve community identity and boundaries” with respect to proposals that “cross-cut . . . affected communities.”² The use of “shall” creates a mandatory duty. Moreover, Section V of the Santa Barbara County Comprehensive Plan Lompoc/Community Goals requires that “[t]he unique character of the area should be protected and enhanced with particular emphasis on protection of agricultural lands.”³ Although the County’s Comprehensive Plan is not directly

¹ See, EDC, *City of Lompoc – Proposal to Expand the Sphere of Influence for the Bailey Avenue Properties* (December 7, 2022).

² (emphasis added). See, Santa Barbara LAFCO, *Sphere of Influence Policies* at <https://www.sblafco.org/files/4a70e3d58/SPHERE+OF+INFLUENCE+POLICIES.pdf>

³ See, Santa Barbara County, Planning and Development, *LAFCO Request for Reportback - File No. 22-07 for the Bailey the Avenue Sphere of Influence (SOI) Amendment – City of Lompoc* at 1 (October 2022).

applicable to SOI amendments, LAFCO policy encourages consistency with County and City local plans and requires the Commission make specific findings when approving inconsistent actions.⁴

The configuration of the current SOI Proposal creates two jutting residential enclaves, surrounded on three sides by agricultural land, that cross-cut a traditionally rural community boundary—thereby threatening the areas unique local character and identity.⁵

II. The City’s Proposal Would Undermine Agricultural Viability of Nearby Properties and Create Conflicts Between Residential Activities and Agricultural Operations.

The City’s proposal would result in existing agricultural lands being sandwiched by development. This would give rise to conflicts between agricultural and non-agricultural uses, and pave the way for additional conversion of important farmlands, thereby undermining the greater agricultural viability of the region.

Ms. Wineman’s properties—totaling 177 acres of actively cultivated Prime farmland along Bailey Avenue—would be particularly impacted by the Proposal.⁶ Her properties share a direct border with the proposed Bailey property (previously Annexation Area A) and diagonally abut the proposed Bodger property (previously Annexation Area B).⁷ The Wineman properties have been used for active agriculture since the 1950’s and consistently produce high yields of broccoli, cauliflower, lettuce, and blackberries. Michele, an experienced agriculturist, described her properties as “among the best and most fertile farm ground not only in the Lompoc Valley but also in the State of California.”⁸

Ms. Wineman manages a network of farmers and lessees, who, with their employees, equipment specialists and auxiliary partners, cultivate and distribute crops from the Wineman properties. Michele stated in her comment letter submitted to LAFCO that “[t]he 70+ years my family has owned and farmed land along Bailey Avenue, in conjunction with other long-farmed properties in the area, has fostered a distinct rural and agricultural identity.”⁹ Ms. Wineman believes that approval of the City’s Proposal would destroy the area’s rural character by creating conflicts between residential activities and existing operations.

For example, Ms. Wineman notes that “City residents do not distinguish between private open space (i.e., farm fields) and public open space (i.e., parks & other recreation areas).”¹⁰ This leads to trash, dog droppings, and damage to expensive farm equipment.¹¹ Vandalism and theft

⁴ *Id.*

⁵ *See*, Appendix A (showing the layout of land included in the current SOI amendment proposal).

⁶ *See*, Appendix B (showing layout of Michele Winemans properties).

⁷ *Id.*

⁸ *See, Michele Wineman’s Personal Statement – Impact of Lompoc’s Proposed SOI Amendment on Bailey Avenue’s Rural Identity and Use Conflicts* (January 30, 2023).

⁹ *Id.*

¹⁰ *Id.*

¹¹ *Id.*

are big concerns. Increased traffic makes it dangerous to move slow farm equipment like tractors and expanded roads cuts into farmable acres.¹² Unmaintained nonfarm properties are breeding grounds for noxious weeds and rodents, which damage and contaminate crops.¹³ City residents often complain about noise, dust, and odors – all necessary components of farming.¹⁴

In order to minimize potential conflicts, Ms. Wineman and other similarly situated property owners will have to implement modifications to existing operations. For instance, Ms. Wineman is forced to “reduce our farmable acres” by leaving space in the form of buffer zones to neighboring residential uses.¹⁵ Other potential modifications include fences, security cameras, artificial barriers, and more. Ms. Wineman’s personal experience is highly demonstrative of the adverse effects residential development can have on agricultural production and community identity.¹⁶

SBCAN agrees that approval of the City’s Proposal would undermine Bailey Avenue’s unique rural and agricultural character, thereby threatening to undermine agricultural viability well beyond the Proposed SOI itself. This is directly inconsistent with LAFCO’s policies requiring the preservation of prime agricultural lands and community identity and Section V of Santa Barbara County’s Comprehensive Plan Lompoc/Community Goals.

Conclusion

We ask the Commission to deny the City’s Proposal in accordance with LAFCO policy and applicable County Goals to preserve Bailey Avenue’s unique community identity and agricultural viability.

Sincerely,

Maggie Hall
Senior Attorney

¹² *Id.*

¹³ *Id.*

¹⁴ *Id.*

¹⁵ *Id.*

¹⁶ *Id.*

Attachment A

**Proposed
NORTH PARCEL**
APN:093-070-064
APN:093-070-065
40.641 ± acres

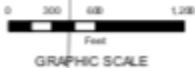
**Proposed
SOUTH PARCEL APN:**
093-111-007 APN:
093-111-008 APN:
093-111-009 APN:
093-111-010 APN:
093-111-011 APN:
093-111-012 107.712
± acres

City of Lompoc

LAFCO 22-07 Bailey Avenue Sphere Amendment

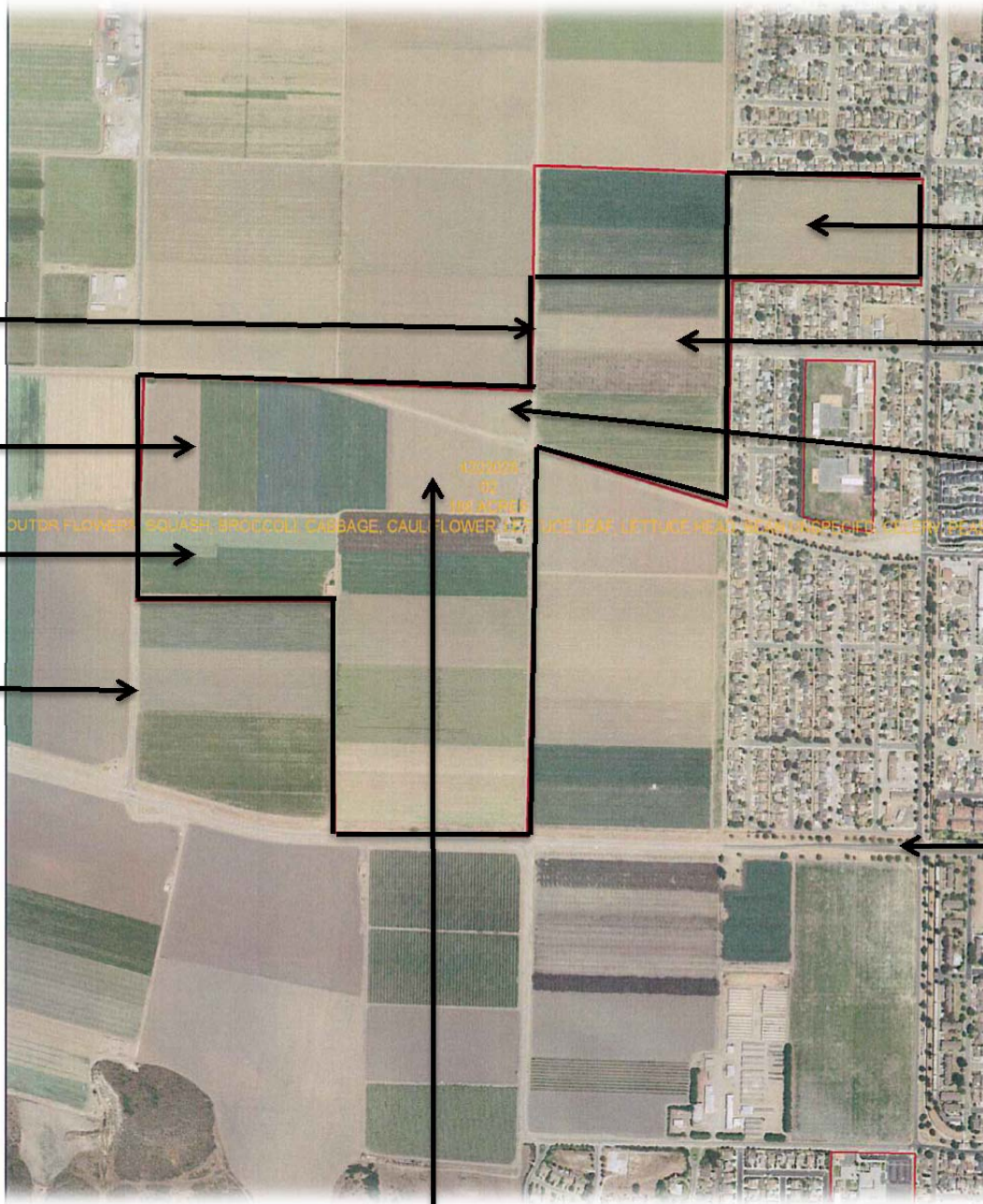
• Sphere of Influence to the City of Lompoc

ATTACHMENT A



Attachment B

Exhibit A



Bailey Avenue

Huyck Parcel
APN 093-090-008

Zvolanek Parcel
APN 093-090-007

Floradale Avenue

13th Street Parcel
APN 093-070-039

McCarrier Parcel
APN 093-070-031

3 Acre Parcel
APN 093-070-029

Ocean Avenue

Main Parcel
APN 093-090-033

Attachment C

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January 30, 2023

Mr. Mike Prater
Executive Officer
Santa Barbara Local Agency Formation Commission
Submitted via email to lafco@sblafco.org

Re: Michele Wineman's Personal Statement – Impact of Lompoc's Proposed SOI
Amendment on Bailey Avenue's Rural Identity and Use Conflicts

Dear Mike Prater and Members of the Commission,

This letter is submitted to the Commission to provide a more intimate understanding of the rich agricultural history and identity of Bailey Avenue that is threatened by the City of Lompoc's proposal to amend the SOI to facilitate residential development. As described below, approval of the proposal would lead to serious conflicts between residential activities and agricultural operations that impair the area's unique character and greatly diminish agricultural productivity and safety. I ask the Commission to deny the proposal to protect Prime Farmground and preserve Bailey Avenue's rural identity.

History of Wineman Family Ownership

The Wineman Family has owned and farmed land in the Bailey Avenue area since the early 1950's. My father was the late Edward S Wineman. In 1939, my grandfather purchased property in the Santa Maria Valley and began farming vegetables. By 1950, he wanted to expand his operation and purchased the Bissinger property located at the corner of Ocean Avenue & Bailey Avenue. He found that conditions in the Lompoc Valley perfect for his crops. In later years, the Wineman family acquired more ground adjacent to the original purchase which is situated on both sides of Bailey Avenue. After being released from the armed services in 1956, my father took over the operation and continued to farm in both the Santa Maria & Lompoc Valleys until his passing in 2017. I continue to manage these properties and plan to keep them in agricultural production.

In the years past, our family have grown sugar beets and dry edible beans as well as beans and flowers for seed crops. At the present, I am mostly farming vegetables such as broccoli, cauliflower, celery and lettuce. The 70+ years my family has owned and farmed land along Bailey Avenue, in conjunction with other long-farmed properties in the area, has fostered a distinct rural and agricultural identity.

Exceptional Nature of Agricultural Land Along Bailey Avenue

My properties are classified as "Prime Farmground." This is based on the exceptional combination of fertile soil, water (both quantity and quality), as well as the microclimate conditions naturally present in the area. The area includes Mocho Series of Loam Soils, which are ranked as Class I on the Soil Capability Index, and 100 on the 100 Point Storie Index rating. The land in the Bailey Avenue area is among the best and most fertile farm ground not only in

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the Lompoc Valley but also in the State of California, and can sustain intensive farming for a variety of crops with minimal conservation practices.

Moreover, the unique microclimate along Bailey Avenue, specifically soil type and air moisture level, allows for high-quality and high-yield crops to be produced with less water. While the precise water saving varies, it usually is within a range of half (50%) to three quarters (75%) less than standard. Since we have farmed similar crops in both the Santa Maria & Lompoc valleys, we have firsthand knowledge of this.

Prime Farmground cannot be created by human controlled factors so it is truly irreplaceable. If it is converted to urban use, this production is gone forever. People not familiar with farming tend to think that production can be intensified substantially from what it is today. In my opinion, this is a misconception. Our methods are already intensive and we are conserving resources as much as possible. The idea that lost production will be made up by more intensive farming on fewer remaining acres, is simply false. For example, I have heard talk about utilizing greenhouse production as a replacement for open-space farming. There are problems with this type of production – they are extremely energy and resource intensive methods. Based on my experience, when plants are grown too intensively, they tend to be stressed because of this and are not as healthy. If they are not healthy, they do not resist disease well which means more chemicals have to be applied to get them to grow and produce. There simply is no easy replacement—no silver bullet—to account for lost open-space farming on Prime Farmground. I estimate that taking this land out of production would reduce the Valley’s vegetable crop yields by approximately 5% – a significant loss.

My experience has been that the per capita quantity and quality of production on Bailey Avenue can rival or exceed that of any farmland in California at any given time. So optimal are conditions in Lompoc that I cannot recall *even one* crop failure due to weather, lack of water, disease or any other natural cause.

Current Agricultural Operations

The Wineman family owns approximately 164 acres on both sides of Bailey Avenue & leases approximately 20 acres from a nonrelated party. Of this total, approximately 177 acres are planted with crops. The other acres are used for roads, pumping plants & structures that support the farming operation.

At the present time, 123 physical acres are in vegetable crops (broccoli, cauliflower, head/leaf lettuce, celery) and 54 physical acres are in blackberries. The farming is year-round (because the microclimate allows for this) so there are multiple plantings. Therefore, the planted/productive acres on an annual basis will exceed the physical acres for vegetable crops. The blackberries are a permanent planting (5 year life) but they are picked multiple times during the season. From experience, I would say that the Bailey Avenue farm ground will produce above average both in weight/yields & quality because of the naturally present soil, water & microclimate conditions.

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Conflict between Residential Activities and Agricultural Operations

City residents do not distinguish between private open space (i.e., farm fields) and public open space (i.e., streets/sidewalks, parks & other recreation areas) and trespass at will. Vandalism and theft are big concerns. People bring dogs and leave behind trash and dog droppings in our growing areas. People are also destructive to our farm & irrigation equipment and will steal items (gas, batteries & aluminum pipe are always popular). Even when caught, they are not prosecuted.

Residential development calls for expanded and more numerous public roads to support increased traffic. Public streets/roads adjacent to our fields are ongoing source of trash including some very large items which we have to remove at our expense. Roadways can also be a source of field contamination (i.e., storm runoff washes contaminants from the road to our fields). Crops cannot be harvested if they come in contact with these contaminants. Sometimes cars end up off the public roads stuck in our fields. Vehicles also have damaged farm structures & irrigation pumps, valves, & pipes situated on our property adjacent to the public roads.

City residents complain of noise, dust & odors. They also don't like their view blocked by farm structures. Weeds (including those classified as noxious weeds by the State of California) often blow off nonfarm properties/public rights of way which the growers then have to clean up & possibly apply additional herbicides along the edge of the fields in order to control effectively (close to the urban boundary). The microclimate along Bailey is beneficial to weed propagation (they grow off the humidity in the air) and they can get out of control very quickly.

Because farming is a form of industrial production, we must follow applicable regulations and procedures to minimize risk and promote safety. The Food Modernization & Safety Act requires us to implement procedures limiting access to the growing areas to only authorized personnel who are trained in food safety procedures. Growers are required to maintain a visitor log (date & time) of site access other than employees. They also must keep the growing areas & water system free of contaminants (general trash, animal/human droppings, petroleum products etc.) so that the harvested product will be clean/edible/free of contamination for the consumers. These problems are exacerbated by the proximity to urban development. Consequently, we must spend more time and resources to comply with applicable laws. We also reduce our farmable acres by leaving space (i.e., buffer zone) next to the residential development. These result in additional costs that we bear in order to comply with the law and be a good neighbor.

Put simply, when residential development encroaches on agricultural land conflicts are inevitable. Absent a pre-determined plan on how to minimize these conflicts fairly, the burden often does—and in this case, most likely will—fall squarely on agricultural producers. This hurts not only farmers, but the entire support industry of workers, agricultural input suppliers, equipment dealers, transporters, brokers and merchants that depend on a consistent supply of high-quality produce.

Conclusion

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The Lompoc Valley has been recognized as an agricultural treasure since it was first settled in the 1870's. It remains that way today and the natural resources cannot be duplicated elsewhere. Food is just as essential as housing. With higher costs of transportation, it will be less expensive to produce locally rather than import from long distances. As a third generation owner, I have a deep appreciation for what the land can do as well as the benefits it provides to the local economy & its residents. Therefore, I am planning to keep it in agricultural production so that the next generation can enjoy this wealth too. Utilizing this land as a sustainable, renewable resource is far more important & better planning than the vision of a straight line along the east side of the City.

I ask the Commission to deny the City of Lompoc's SOI amendment in order to protect Prime Farmground and preserve the rural character of this community.