

Alexander, Jacquelyne

Subject: FW: Comments re "Study Session" on proposed annexation to the City of Lompoc known as "Bailey Avenue Corridor"
Attachments: Group ltr to LAFCO re Bailey Ave Study Session_FINAL_2021_03_03.pdf

From: Tara Messing
Sent: Wednesday, March 3, 2021 3:56 PM
To: sbcob@countyofsb.org
Cc: Linda Krop <lkrop@environmentaldefensecenter.org>
Subject: Comments re "Study Session" on proposed annexation to the City of Lompoc known as "Bailey Avenue Corridor"

Hello,

This letter is submitted in advance of the March 4 Study Session by the Environmental Defense Center ("EDC") on behalf of a diverse set of stakeholders including local ranchers, farmers, and conservationists in opposition to the proposed annexation of agricultural lands in the Bailey Avenue corridor to the City of Lompoc ("City"). As discussed in the letter, proceeding with this annexation is contrary to the Santa Barbara County Local Agency Formation Commission's ("LAFCO") policies encouraging the conservation of prime agricultural lands and is not in the interest of the City community or the residents of the County of Santa Barbara ("County").

Sincerely,
Tara

TARA C. MESSING (she/her/hers)

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March 3, 2021

Chair Waterfield and Commissioners
Santa Barbara LAFCO
123 E Anapamu Street #3
Santa Barbara, CA 93101

Submitted electronically via sbcob@countyofsb.org

Re: Application for Sphere of Influence and Annexation of the Bailey Avenue Corridor Outside of the City of Lompoc - OPPOSE

Dear Chair Waterfield and Commissioners:

This letter is submitted by the undersigned organizations and individuals in opposition to the proposed annexation of prime agricultural lands in the Bailey Avenue corridor to the City of Lompoc ("City"). The Bailey Avenue annexation proposal is strongly opposed by a diverse set of stakeholders including local ranchers, farmers, and conservationists. Proceeding with this annexation is contrary to the Santa Barbara County Local Agency Formation Commission's ("LAFCO") policies encouraging the conservation of prime agricultural lands and is not in the interest of the City community or the residents of the County of Santa Barbara ("County").

First, the proposed annexation areas are designated as "Prime Farmland" and are actively used for agricultural operations. Consistent with LAFCO policies, prime agricultural lands must be protected from conversion.

Second, the proposal fails to promote infill development on existing sites within the City. The conversion of prime farmland to low-density residential housing in the Bailey Avenue corridor would be contrary to LAFCO policies.

Finally, allowing for the urbanization of prime farmland outside of the existing City limits will not facilitate orderly growth, as intended by the Legislature in enacting the Cortese-Knox-Hertzberg Act. Gov't Code § 56001. The proposed conversion of agricultural lands to

low-density residential housing would not reduce long-distance commuting, thereby increasing the City's existing jobs-housing imbalance.

I. A Diverse Group of Local Ranchers, Farmers, and Conservationists Continue to Oppose the Bailey Avenue Annexation Proposal.

Over the past few years, a diverse group of agricultural interests and conservationists united to support the preservation of agricultural lands in the County and oppose unnecessary sprawl. In 2011, EDC and SBCAN, in partnership with several agriculturalists, convinced the City of Lompoc to reconsider its decision to allow the development of prime agricultural land within the Bailey Avenue corridor in the City.¹ The Bailey Avenue expansion area was a proposed annexation area opposed by both environmental and farming groups. The proposal would have transformed a 270-acre piece of prime agricultural land into an urbanized development consisting of nearly 2,700 homes and more than 225,000 square feet of commercial space. The Bailey Avenue area lies within some of the most productive agricultural land in the state and is farmed largely for high-value row food crops.

Despite the successful protection of these lands in the past, the Bailey Avenue area is again under threat of conversion to urban land uses due to the City's Bailey Avenue Sphere of Influence ("SOI") and Annexation Application. The County has repeatedly declined to support the City's Application, and also declined to enter into a memorandum of agreement ("MOA") with the City pursuant to Governor Code section 56425(b), citing to inconsistencies with certain State, regional and local planning goals and policies.² Although no agreement was reached by the City and County as to a MOA, the City proceeded to submit the Application to LAFCO for consideration consistent with its policies. Gov't Code § 56425(d).

II. LAFCO Policies Emphasize the Importance of Preserving Agricultural Lands in the County, Especially Prime Farmland.

The Cortese-Knox-Hertzberg Act strongly discourages the use of prime agriculture land for development, and one of the main goals of LAFCOs is to conserve such lands. Cal. Gov't Code § 56001. LAFCOs have a statutory role in preserving agricultural lands that cannot come secondary to other interests. By guiding development toward vacant urban land and away from agricultural lands, LAFCOs assist with the preservation of valuable agricultural resources.

¹Settlement Agreement between City of Lompoc and Santa Barbara County Action Network (2011). LAFCO previously denied the City's request to include the Bailey Avenue corridor in the City's Sphere of Influence on March 11, 1999. County of Santa Barbara, Planning and Development, Long Range Planning, *City of Lompoc Bailey Avenue Sphere of Influence and Annexation Proposal, Long Range Planning Division Informal Review – Preliminary Comments* at 2 (September 28, 2018).

² Letter from Mona Miyasato, Executive Officer for the County of Santa Barbara, to Jim Throop, City Manager for the City of Lompoc (February 6, 2020); Letter from Lisa Plowman, Director of the County of Santa Barbara's Planning and Development, to Brian Halvorson, Planning Manager for the City of Lompoc (December 18, 2019); Letter from Lisa Plowman, Director of the County of Santa Barbara's Planning and Development, to Brian Halvorson, Planning Manager for the City of Lompoc (October 24, 2019); Letter from Lisa Plowman, Director of the County of Santa Barbara's Planning and Development, to Paul Hood, Former Executive Officer for the Santa Barbara Local Agency Formation Commission (November 26, 2019).

LAFCOs are also intended to discourage urban sprawl that results in the inefficient delivery of urban services (e.g., police, fire, water, and sanitation) and the unnecessary loss of agricultural resources and open space lands.³

In reviewing annexation proposals under Government Code section 56668, LAFCO must consider various factors, including “[t]he effect of the proposal on maintaining the physical and economic integrity of agricultural lands.” Gov’t Code § 56668(c). Moreover, LAFCO policy encourages the development of existing non-prime agricultural lands for urban uses within the existing jurisdiction of a local agency “before any proposal is approved which would allow for the development of existing open-space lands for non-open space uses which are outside of the existing jurisdiction of the local agency....” Gov’t Code § 56377(b).

The LAFCO Commissioner Handbook also sets forth policies that encourage the conservation of agricultural lands.⁴ LAFCO policy discourages “[p]roposals which would conflict with the goals of maintaining the physical and economic integrity of open space lands, agricultural lands, or agricultural preserve areas in open space uses, as indicated on the city or county general plan....”⁵ Moreover, agricultural resources and support facilities are given special considerations under LAFCO SOI policies.⁶ Notably, LAFCO requires that “[h]igh value agriculture areas, including areas of established crop production, with soils of high agricultural capability should be maintained in agriculture, and in general should not be included in an urban service sphere of influence.”⁷

III. The Bailey Avenue SOI and Annexation Application Must be Denied.

Based on the foregoing, the Bailey Avenue SOI and Annexation Application must be denied due to the multitude of policy inconsistencies. First, the proposal conflicts with LAFCO’s policies encouraging the conservation of prime agricultural lands.⁸ The proposed annexation areas are actively used for agricultural operations and are designated as “Prime Farmland” by the California Department of Conservation’s most recent map of California Important Farmland.⁹ Consistent with LAFCO policies, as well as similar policies in the County’s Comprehensive Plan, these prime agricultural lands must be protected from conversion to residential development.

³ California Local Agency Formation Commission, *What is LAFCO?*, available at: <https://calafco.org/lafco-law/faq/howdoes-lafco-discourage-urban-sprawl>.

⁴ Santa Barbara Local Agency Formation Commission, *Commissioner Handbook; Policy Guidelines and Standards*, (rev. January 2020).

⁵ *Id.* at 5.

⁶ *Id.* at 3.

⁷ *Id.*

⁸ Santa Barbara Local Agency Formation Commission, *Policies Encouraging Conservation of Prime Agricultural Lands and Open Space Areas*, available at: http://www.sblafco.org/policy_05.sbc.

⁹ California Department of Conservation, *California Important Farmland Finder*, available at: <https://maps.conservation.ca.gov/DLRP/CIFF/>.

Second, the proposal fails to promote infill development on existing sites within the City. LAFCO policies, however, encourage the annexation and development of existing lands within a City's SOI "prior to development outside of an existing [SOI]."¹⁰ The conversion of prime farmland to low-density residential housing in the Bailey Avenue corridor is contrary to LAFCO policies and would foster patterns of unrestrained development throughout the County. In the Long Range Planning Division's Preliminary Analysis of the Bailey Avenue SOI and Annexation Proposal dated September 28, 2018, the County concluded that "...more housing is [] possible if the City rezoned lands within the existing city SOI to a higher density. Therefore, instead of two large residential developments, the City could permit smaller, but more numerous, housing projects within city boundaries to obtain the same number of new residences as proposed under this project."¹¹ Feasible infill development must be required over sprawl to prevent the unnecessary loss of prime agricultural lands in the County.

Finally, the conversion of prime farmland to low-density residential housing will not facilitate orderly growth, as intended by the Legislature in enacting the Cortese-Knox-Hertzberg Act. Gov't Code § 56001. As recognized by the County, "...more than 11,000 residents of Lompoc commute out of the City for work, and therefore, the proposed low-density housing would exacerbate the existing jobs-housing imbalance between the Lompoc area and the rest of Santa Barbara County."¹² The addition of low-density residential housing without new long-term employment opportunities only serves to increase long-distance commuting by Lompoc residents, adding to traffic and congestion. The significant impacts on agriculture, people, and our environment from this proposal must be avoided by restricting urban development to existing areas within the City.

IV. Conclusion

For the foregoing reasons, we, the undersigned ranchers, farmers, and conservationists, urge LAFCO to protect and preserve vital agricultural lands in the County by denying the Bailey Avenue SOI and Annexation Application. Thank you for your consideration of these comments.

Sincerely,

Tara C. Messing
Environmental Defense Center, Staff Attorney

Ken Hough
Santa Barbara County Action Network ("SBCAN"), Executive Director

¹⁰ Santa Barbara Local Agency Formation Commission, *Policies Encouraging Conservation of Prime Agricultural Lands and Open Space Areas*, available at: http://www.sblafco.org/policy_05.sbc.

¹¹ County of Santa Barbara, Planning and Development, Long Range Planning, *City of Lompoc Bailey Avenue Sphere of Influence and Annexation Proposal, Long Range Planning Division Informal Review – Preliminary Comments* at 5 (September 28, 2018).

¹² *Id.* at 6.

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Teri Bontrager
Santa Barbara County Farm Bureau, Executive Director

Claire Wineman
Grower-Shipper Association of Santa Barbara and San Luis Obispo Counties, President

Marell Brooks
Citizens Planning Association of Santa Barbara County, President

Art Hibbits
Hibbits Ranch Company, LLC, Manager

L Michele Wineman
Landowner/Farmer

Joyce Howerton
Former Mayor for the City of Lompoc

Bob Lingl
Former Mayor for the City of Lompoc

Paul Van Leer
Las Varas Ranch, Manager

Sharyne Merritt
Landowner and Agricultural Advisory Committee Appointee

Jim Poett
Rancho San Julian

Bob and Geri Campbell
Third Generation Grower, Processor, and Shipper

John Silva
Landowner and Grower West of Proposal

Larry Mendez & Family
Landowner of Parcel to the Northwest of Bailey Avenue

Don and Mary Mason
Owner of Former Rivaldi Dairy Properties

Jay Fisher
Farmer

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Steve Jordan
West Lompoc Valley Grower

Joan Wells
Former Santa Barbara County Planning Commissioner for the First District

Mary Jane and Dr. Edalatpour
Landowners

Carla Rosin
Food Systems Consultant