

# LAFCO

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## Santa Barbara Local Agency Formation Commission

105 East Anapamu Street ♦ Santa Barbara CA 93101

805/568-3391 ♦ FAX 805/568-2249

www.sblafco.org ♦ lafco@sblafco.org

July 11, 2019 (Agenda)

Local Agency Formation Commission

105 East Anapamu Street

Santa Barbara CA 93101

### **Review of Agricultural and Open Space Policies from the Agriculture and Open Space Ad Hoc Committee.**

Dear Members of the Commission

#### RECOMMENDATION

It is recommended that the Commission Approve the Recommended Revisions to the Agriculture and Open Space Policies from the Agriculture and Open Space Ad Hoc Committee as set forth in **Exhibit A**.

#### DISCUSSION

At the December 6, 2018 meeting, the Commission appointed three members to serve on the Agricultural and Open Space Policies Ad Hoc Committee. The purpose of the Ad Hoc Committee is to review the Commission's current Agricultural and Open Space Policies and determine if the policies should be revised or amended. A copy of the current policies is attached as **Exhibit B**. Staff suggested changes and revisions are attached as **Exhibit C**.

The members of the Ad Hoc Committee are Commissioners Roger Aceves, Joan Hartmann, and Etta Waterfield. The Ad Hoc Committee met three times, once in January, once in March, and once in June.

At the March meeting, staff was directed to send out the current policies with suggested changes and additions for comments, to the County's Planning agencies, namely the eight Cities and Santa Barbara County. Any comments should be returned to staff by May 15, 2019. Additionally, at

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**Commissioners:** Steve Lavagnino, Chair ♦ Roger Aceves ♦ Craig Geyer, Vice-Chair ♦ Joan Hartmann ♦ Holly Sierra  
Shane Stark ♦ Etta Waterfield ♦ Roger Welt ♦ Das Williams ♦ **Executive Officer:** Paul Hood

**BUSINESS ITEM NO. 1**

Local Agency Formation Commission  
September 11, 2019 (Agenda)  
Page two

the April 4, 2019 meeting, staff was directed to send the same request for comments to the Independent Special Districts and the Agricultural Community.

Comments were received from 15 public agencies, organizations, and individuals. A list of comment letters is attached as **Exhibit D**. The comment letters were reviewed by the Ad Hoc Committee at the June 6, 2019 meeting and are attached as **Exhibit E**. After reviewing the comment letters, the Ad Hoc Committee unanimously agreed to the changes set forth in **Exhibit A**.

Exhibits:

Exhibit A	Ad Hoc Committee Recommended Revisions
Exhibit B	SBLAFCO Agricultural and Open Space Policies
Exhibit C	Staff Suggested Revisions to SBLAFCO Agricultural and Open Space Policies
Exhibit D	List of Comment Letters
Exhibit E	Comment Letters

Please contact the LAFCO office if you have any questions.

Sincerely,



PAUL HOOD  
Executive Officer

## SB LAFCO AG AND OPEN SPACE POLICIES

### July 11, 2019 Recommended Revisions

#### IV. POLICIES ENCOURAGING ORDERLY URBAN DEVELOPMENT AND PRESERVATION OF OPEN SPACE PATTERNS (deleted)

1. The Commission encourages will planned, orderly, and efficient urban development patterns for all developing areas. Also, the county, cities, and those districts providing urban services, are encouraged to develop and implement plans and policies which will provided for well-planned, orderly and efficient urban development patterns, with consideration of preserving permanent open space lands within those urban patterns.
2. Development of existing vacant non-open space, and nonprime agricultural land within an agency's boundaries is encouraged prior to further annexation and development. However, where open land adjacent to the agencies are of low agricultural, scenic, or biological value, annexation of those lands may be considered over development of prime agricultural land already existing within an agency's jurisdiction.
3. Proposals to annex undeveloped or agricultural parcels to cities or districts providing urban services shall demonstrate that urban development is imminent for all or a substantial portion of the proposal area; that urban development will be contiguous with existing or proposed development; and that a planned, orderly, and efficient urban development pattern will result. Proposals resulting in a leapfrog, non-contiguous urban pattern will be discouraged.
4. Consideration shall be given to permitting sufficient vacant land within each city and/or agency in order to encourage economic development, reduce the cost of housing, and allow timing options for physical and orderly development.

#### V. POLICIES ENCOURAGING CONSERVATION OF PRIME AGRICULTURAL LANDS AND OPEN SPACE AREAS

1. Proposals 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, shall be discouraged.
2. Annexation and development of existing vacant non-open space lands, and nonprime agricultural land within an agency's sphere of influence is encouraged to occur prior to development outside of an existing sphere of influence.
3. A sphere of influence revision or update for an agency providing urban services where the revision includes prior agricultural land shall be discouraged. Development shall be guided towards areas containing nonprime agricultural lands, unless such action will promote disorderly, inefficient development of the community or area.

4. Loss of agricultural lands should not be a primary issue for annexation where city and county general plans both indicate that urban development is appropriate and where there is consistency with the agency's sphere of influence. However, the loss of any primer agricultural soils should be balanced against other LAFCO policies and a LAFCO goal of conserving such lands.
5. A Memorandum of Agreement between and City and the County should be used and amended as needed to address the impacts on and conversion of Agricultural Lands on the fringe of a City. (added)

## SB LAFCO AG AND OPEN SPACE POLICIES

### IV. POLICIES ENCOURAGING ORDERLY URBAN DEVELOPMENT AND PRESERVATION OF OPEN SPACE PATTERNS

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## PRESERVING OPEN SPACE AND AGRICULTURAL RESOURCES

LAFCO must consider the effect that any proposal may produce on existing open space and agricultural lands, especially prime farm lands. The Cortese-Knox-Hertzberg Act (CKH) strongly discourages the use of prime agriculture land for development. The definition of prime agriculture land is found in the CKH Act and is broadly defined in the Act. By guiding development toward vacant urban land and away from agricultural land, LAFCO assists with the preservation of valuable agricultural resources. The policies in Sections IV. and V are designed to assist LAFCO in making decisions concerning the Encouragement of Orderly Urban Development and reservation of Open Space Patterns and Encouraging the Conservation of Prime Agricultural Lands and Open Space. A policy is a statement that guides decision making by indicating a clear direction on the part of LAFCO. The following two policies support the goals stated above and shall be used by Santa Barbara LAFCO when considering a proposal that would involve agricultural resources:

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5. A Memorandum of Agreement between a city and the County should be used and amended as needed to address the impacts on and conversion of Agricultural Lands on the fringe of a city.
6. The Commission may approve annexations of prime agricultural land only if mitigation that equates to a substitution ratio of at least 1:1 for the prime land to be converted from agricultural use is agreed to by the applicant (landowner), the jurisdiction with land use authority. The 1:1 substitution ratio may be met by implementing various measures:
  - a. Acquisition and dedication of farmland, development rights, and/or agricultural conservation easements to permanently protect farmlands within the annexation area or lands with similar characteristics within the County Planning Area.
  - b. Payment of in-lieu fees to an established, qualified, mitigation/conservation program or organization sufficient to fully fund the acquisition and dedication activities stated above in 6a.
  - c. Other measures agreed to by the applicant and the land use jurisdiction that meet the intent of replacing prime agricultural land at a 1:1 ratio.



# **Agricultural and Open Space Policies Request for Comments**

**LAFCO Agricultural Policies and CEQA-Bill Dillon, LAFCO Legal Counsel**

**City of Goleta**

**City of Santa Maria**

**City of Lompoc**

## **Survey Results**

**County of Santa Barbara**

**Environmental Defense Center (EDC)**

**Thomas Figg- Bailey Avenue Consultant**

**Grower/Shipper Association**

**Sure Stay, Plus Hotel-Best Western-Patel**

**Hilton Garden Inn-Patel**

**Holiday Inn Express-Patel**

**Santa Maria Chamber of Commerce**

**COLAB-Andy Caldwell**

**Santa Barbara County Cattlemen's Association**

## **LAFCO Agricultural Policies and CEQA.**

**CEQA Exemption Class 8.** The proposed revisions to LAFCO’s policies on protection of open space and agricultural resources are exempt from CEQA pursuant to CEQA Guidelines section 15308, which are actions by regulatory agencies for protection of the environment. This provision is “Class 8” under the Guidelines and provides as follows:

**“Section 15308. ACTIONS BY REGULATORY AGENCIES FOR PROTECTION OF THE ENVIRONMENT**

“Class 8 consists of actions taken by regulatory agencies, as authorized by state or local ordinance, to assure the maintenance, restoration, enhancement, or *protection of the environment where the regulatory process involves procedures for protection of the environment.* Construction activities and relaxation of standards allowing environmental degradation are not included in this exemption.” (Emphasis added.)

The proposed LAFCO Policy revisions are intended to enhance the protection of existing agricultural resources from conversion to urban development. Existing agricultural operations are part of the environment as CEQA defines “environment” broadly in Public Resources Code section 21060.5, as follows:

**Public Resources Code § 21060.5. ENVIRONMENT**

“Environment” means the physical conditions that exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, or objects of historic or aesthetic significance.

This definition amplified by CEQA Guidelines section 15360, which provides as follows:

**“CEQA Guidelines section 15360. Environment**

“ ‘Environment’ means the physical conditions which exist within the area which will be affected by a proposed project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historical or aesthetic significance. The area involved shall be the area in which significant effects would occur either directly or indirectly as a result of the project. The "environment" includes both natural and man-made conditions.”

The Legislature has adopted measures in CEQA that show a statewide policy to protect agriculture from urban development. Public Resources Code section 21095 directed OPR to amend Appendix G in the CEQA Guidelines “to provide lead agencies an optional methodology to ensure that significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process.”

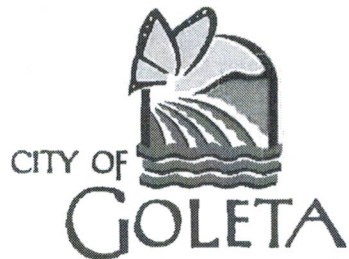
To that end, as part of Appendix G to the CEQA Guidelines, the Office of Planning and Research adopted “Section II. Agriculture and Forestry Resources” which requires a lead agency to determine “whether impacts to agricultural resources are significant environmental effects . . .” Further, the lead agency should determine if a proposed project would “Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance” as shown by a site assessment prepared by the California Department of Conservation. This shows that generally the conversion of agricultural operations to urban development is potentially a significant impact under CEQA.

**“Common Sense” Exemption.** The proposed policy amendments are exempt from CEQA review pursuant to CEQA Guidelines section 15061(b)(3), the “common sense” exemption. This Section provides:

- (3) The activity is covered by the common sense exemption that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA.

The proposed LAFCO Policy amendments only seek to further protection agriculture from new urban development. As part of the existing environment, existing agricultural operations will be part of the environmental baseline setting.

**Conclusion.** Therefore, under either exemption, the proposed revisions to LAFCO’s policies on agricultural protection from urban development are exempt from CEQA.



June 4, 2019

**CITY COUNCIL**

Paula Perotte  
*Mayor*

Kyle Richards  
*Mayor Pro Tempore*

Roger S. Aceves  
*Councilmember*

Stuart Kasdin  
*Councilmember*

James Kyriaco  
*Councilmember*

**CITY MANAGER**  
Michelle Greene

Mr. Paul Hood  
Executive Director  
Santa Barbara Local Agency Formation Commission  
105 East Anapamu Street  
Santa Barbara CA 93101

RE: LAFCO Agricultural and Open Space Policies

Dear Mr. Hood:

Thank you for the opportunity to comment on the Santa Barbara Local Agency Formation Commission (LAFCO) Agricultural and Open Space Policies. The City of Goleta supports the policy recommendations of the Environmental Defense Center's Open-Space Preservation and Education Network ("OPEN") as expressed in its March 16, 2018 and May 8, 2019 letters to LAFCO (attached), as well as the recommendations of the CALAFCO White Paper.

OPEN's letters and the CALAFCO White Paper highlight the importance of preserving agricultural land in Santa Barbara County and emphasize that it is a core LAFCO responsibility. They also recommend that LAFCO undertake a comprehensive review of its policies and process along with local spheres of influence. Protecting agricultural lands and open spaces while encouraging infill development and containing urban sprawl should be among LAFCO's highest priorities.

We appreciate the opportunity to provide this input.

Sincerely,

Paula Perotte  
City of Goleta Mayor

cc: Goleta City Council Members  
LAFCO Commission Members



110 S. PINE STREET #101 (ON HERITAGE WALK) • SANTA MARIA, CALIFORNIA 93458-5082 • 805-925-0951 • TDD 925-4354

May 15, 2019

Paul Hood, Executive Director  
Santa Barbara Local Agency Formation Commission  
105 East Anapamu Street  
Santa Barbara, CA 93101

**RE: LAFCO Agricultural and Open Space Policies**

Dear Mr. Hood,

Thank you for the opportunity to review the proposed revisions to the Santa Barbara LAFCO Agricultural and Open Space Policies. I have consulted with the City Manager's Office, our City Council and Planning Commission, as well as other stakeholders, in providing the response included in this letter. Please forward the following comments to the LAFCO Commission and Ad Hoc Committee for their review.

The overall policy statement is an unnecessary addition; however, if it is to be included, it should more clearly articulate the authority of LAFCO in preserving open space and agricultural resources. For example, a sentence could be added that reads, "Government Code Section 56001, which established LAFCO states: 'The Legislature recognizes that the logical formation and determination of local agency boundaries is an important factor in promoting orderly development and in balancing that development with sometimes competing State interests of discouraging urban sprawl, preserving open space and prime agricultural lands, and efficiently extending government services.'"

Other edits to the policy statement, if kept, include: removal of the word "strongly" in the second sentence; replacement of the word "guiding" with "encouraging" in the fourth sentence; correction of a typo by replacing the word "reservation" with "preservation" in the fifth sentence; removal the sixth sentence; and revision of the last sentence to read, "The following language shall be used by Santa Barbara LAFCO when considering a proposal that would involve agricultural resources."

Paragraph 5 calls for an agreement to be adopted by the City and LAFCO to address impacts on and concession of agricultural lands adjacent to the City. It is unclear what terms would be required to be reached in such an agreement. The City considers paragraph 5 to be unnecessary.

For paragraph 6, the City finds that the proposed language requiring mitigation exceeds LAFCO's scope of authority, from a Commission that "exercise(s) its powers... in a

manner that *encourages*... planned, well-ordered, efficient urban development patterns” to a Commission that would *require* it. The proposed revision states, “the Commission may approve annexations of prime agricultural land *only if* mitigation that equates to a substitution ratio of at least 1 to 1... is agreed to.” The use of the phrase “only if” indicates a conditional requirement.

Paragraph 6 then lists specific mitigation measures that would complicate and undermine the City’s ability to direct development, predicated on an adopted General Plan and corresponding zoning. It is uncertain how the proposed mitigation measures of dedication of other farmland, or payment of in-lieu fees, would serve as mitigation to the conversion of agricultural land to other uses, as any proposed mitigation is susceptible to scrutiny contesting the adequacy of the mitigation.

In summary, the City disagrees with the proposed revisions and recommends no change, due to the negative impacts they would have on the City’s ability to plan for future growth, including a projection of approximately 30,000 persons and 10,000 jobs in the next 20 years. The City is embarking on a comprehensive General Plan update and will explore several growth alternatives as part of this effort. The California Environmental Quality Act requires us to evaluate varying scenarios and their corresponding impacts, which I anticipate would include a range of infill and expansion options. The City wishes to preserve the ability to explore the full range of options in planning for future growth.

Consistent with LAFCO’s existing policies, the City strives for balanced, logical and reasonable development, and would plan for services accordingly. The City intends to plan in a way that enhances quality of life, adds housing stock to meet local, regional and state needs, promotes job growth and ensures a healthy economy, which would also include the preservation of open space and agricultural lands. However, the City wishes to maintain local control to manage growth, with meaningful community input, and in collaboration with stakeholders and other agencies in the region.

Sincerely,



Chuen Ng  
Community Development Director

cc: Jason Stilwell, City Manager, City of Santa Maria  
Glenn Morris, CEO, Santa Maria Chamber of Commerce  
City of Santa Maria City Council  
City of Santa Maria Planning Commission



May 14, 2019

Paul Hood  
Executive Officer  
SB Local Agency Formation Commission  
105 East Anapamu Street  
Santa Barbara CA 93101

**RE: Request for Comments –LAFCO Agricultural and Open Space Policies**

Dear Mr. Hood:

Thank you for the opportunity to comment on proposed revisions to LAFCO Agricultural and Open Space policies as transmitted on March 26, 2019.

The City of Lompoc respectfully reminds the Commission, its purpose, as set forth in its enabling statute, is to provide opportunities for incorporated cities to achieve reasonable urban development to best serve each community's needs, while balancing that development against the state-wide interest of preserving agricultural resources.

Specifically, Government Code Section 56001, states:

"The Legislature finds and declares that it is the policy of the state to encourage orderly growth and development which are essential to the social, fiscal, and economic well-being of the state." (Emphasis added)

"The Legislature recognizes that the logical formation and determination of local agency boundaries is an important factor in promoting orderly development and in balancing that development with sometimes competing state interests of discouraging urban sprawl, preserving open-space and prime agricultural lands, and efficiently extending government services."

"The Legislature also recognizes that providing housing for persons and families of all incomes is an important factor in promoting orderly development." (Emphasis added)

"Therefore, the Legislature further finds and declares that this policy should be effected by the logical formation and modification of the boundaries of local agencies, with a preference granted to accommodating additional growth within, or through the expansion of, the boundaries of those local agencies which can

best accommodate and provide necessary governmental services and housing for persons and families of all incomes in the most efficient manner feasible.” (Emphasis added)

LAFCO’s enabling statute does not say “preserve prime agricultural land and open space” at all costs to the detriment of other necessary land uses. It clearly says there needs to be a balance of land uses. The City believes proposed Policies IV 3. and 4. provide a method for LAFCO to meet those statutory requirements. The City also understands whether those requirements are achieved will depend on the manner in which LAFCO implements those policies. Based on that, the City believes more direction should be included in those policies so the public can clearly understand how they will be implemented. Please let us know if you want the City to provide suggestions for that additional language.

Policy V, as titled, seems to go beyond the statutory requirements regarding prime agricultural land. Encouragement of conserving such land seems counter to the legislative edict for LAFCO to encourage orderly growth of cities. Policy V. 4. also seems to provide more emphasis on what a county General Plan’s designation for an unincorporated area is rather than what the subject city’s land use designation would be if annexed. Such misdirected emphasis again seems to be counter to LAFCO’S statutory directions to provide opportunities for needed urban growth. Policies V. 5. and 6. also unnecessarily limits the means LAFCO could use to ensure proper balancing of economic growth and preservation of true agricultural land.

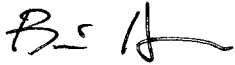
Moreover, if a developer were forced to incur costs to acquire development rights or conservation easements, then that would add to the expense of the housing or other uses that are being built. A reasonable alternative would be the implementation of open space buffers between agricultural uses and residential uses to provide necessary barriers to protect sensitive land use types, including reduction of the public safety issues caused by pesticide drift. If the land use planning process has integrity, then there is no need for the purchase of development rights on other territory. In addition, with the Legislature and Governor’s recent declarations of the severe housing crisis (and a recent pledge by the Governor to build 3.5 million new homes in California by 2025) facing our state, any efforts to minimize the cost of all types of housing are critically important. Based on that, the City strongly suggests the LAFCO policies must include language and provisions to assist local communities in their efforts to solve that acknowledged housing crisis.

In closing, it is apparent the proposed policies, if adopted, would constrain those who are elected in the future to make policy decisions that respond to the realities of their times in office. Within statutorily mandated constraints, future elected officials should be able to achieve policy decisions “right” for their circumstances without having to be unnecessarily constrained.



Thank you for the opportunity to comment. If you would like to further discuss our comments, then please contact me at (805) 875-8228 or by email at [b\\_halfvorson@ci.lompoc.ca.us](mailto:b_halfvorson@ci.lompoc.ca.us).

Sincerely,



Brian Halvorson  
Planning Manager

Attachment: LAFCO letter dated March 26, 2019

c: Honorable Mayor and City Council  
Jim Throop, City Manager  
Jeff M. Malawy, City Attorney

# LAFCO

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## Santa Barbara Local Agency Formation Commission

105 East Anapamu Street ♦ Santa Barbara CA 93101

805/568-3391 ♦ FAX 805/568-2249

www.sblafco.org ♦ lafco@sblafco.org

March 26, 2019

**TO: Each City Community Development Director  
County Director of Planning and Development**

**SUBJECT: Request for Comments - LAFCO Agricultural and Open Space  
Policies – Due May 15, 2019**

The Commission is interested in reviewing and updating its current Agricultural and Open Space Policies. In this regard, at the December 6, 2018, the Commission formed an Agricultural and Open Space Policies Ad Hoc Committee comprised of one County member and two City members. After two meetings, staff was directed to send out LAFCO's current policies for review and comment, to the County's Planning agencies, namely the eight Cities and Santa Barbara County.

The current Santa Barbara LAFCO Agricultural and Open Space Policies with two revisions added by staff is attached as **Exhibit A**.

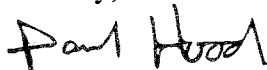
A link to the October 11, 2018, LAFCO Staff Report that includes several relevant documents that have been reviewed by the Commission and staff, is as follows:

<http://sblafco.org/asset.c/1021>

**Any comments should be returned to LAFCO staff by May 15, 2019.** The comments will be reviewed by the Ad Hoc Committee in May. An Information Item would be scheduled for discussion at the June 6, 2019 Commission meeting.

Please contact the LAFCO office if you have any questions.

Sincerely,



PAUL HOOD  
Executive Officer

Cc: County Executive Officer  
Each City Manager

## PRESERVING OPEN SPACE AND AGRICULTURAL RESOURCES

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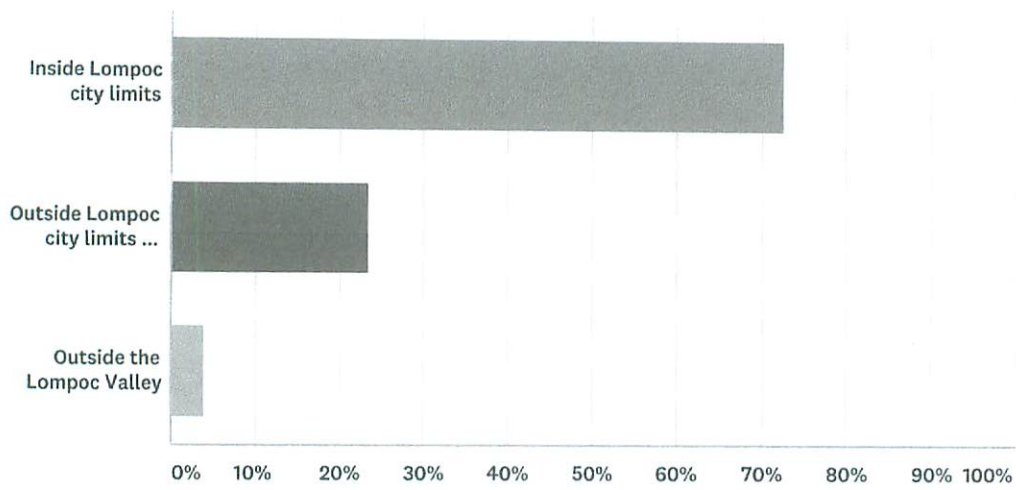
a. Acquisition and dedication of farmland, development rights, and/or agricultural conservation easements to permanently protect farmlands within the annexation area or lands with similar characteristics within the County Planning Area.

b. Payment of in-lieu fees to an established, qualified, mitigation/conservation program or organization sufficient to fully fund the acquisition and dedication activities stated above in 6a.

c. Other measures agreed to by the applicant and the land use jurisdiction that meet the intent of replacing prime agricultural land at a 1:1 ratio.

### Q1 Where do you live?

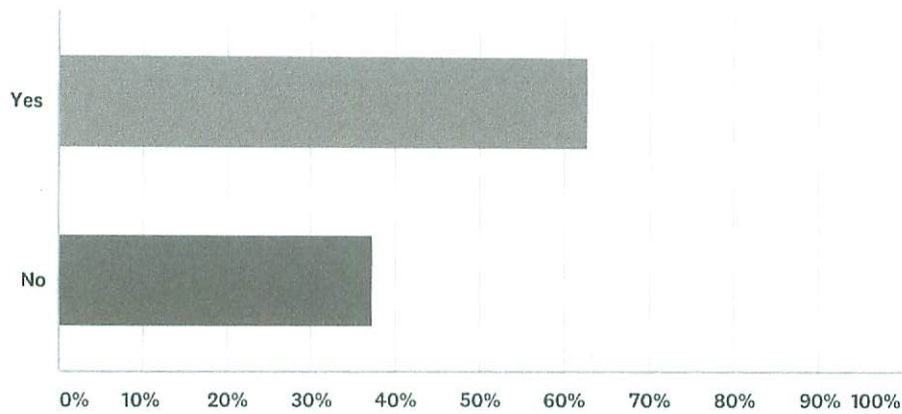
Answered: 282 Skipped: 3



ANSWER CHOICES	RESPONSES	
Inside Lompoc city limits	72.70%	205
Outside Lompoc city limits but in the Lompoc Valley	23.40%	66
Outside the Lompoc Valley	3.90%	11
<b>TOTAL</b>		<b>282</b>

### Q2 Do you want to see Lompoc grow outside of its current physical boundaries? (please see city map from news announcement for reference)

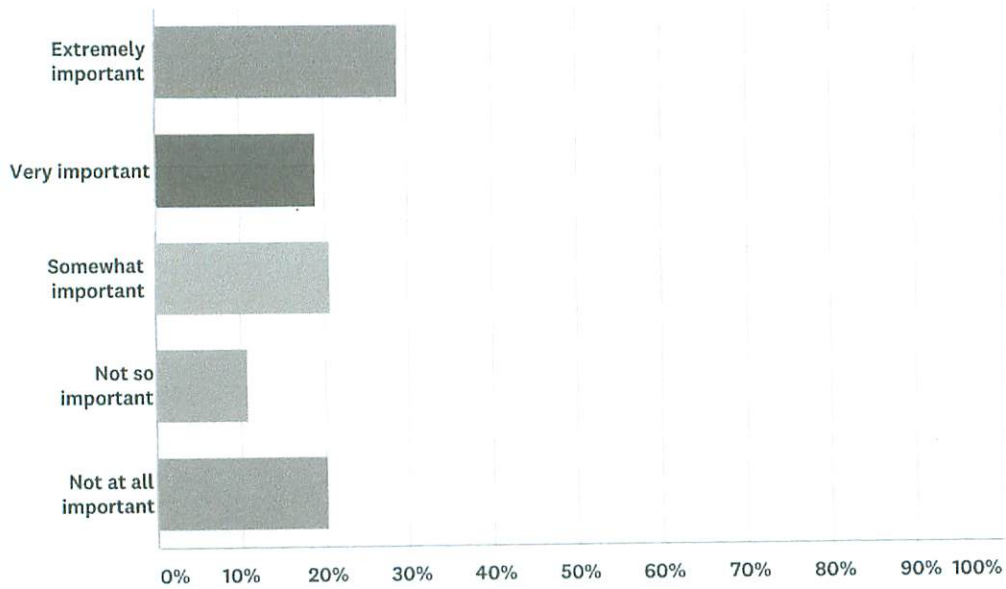
Answered: 279 Skipped: 6



ANSWER CHOICES	RESPONSES	
Yes	62.72%	175
No	37.28%	104
TOTAL		279

### Q3 If you answered "yes" to the above question, how important is the physical expansion of the city to you?

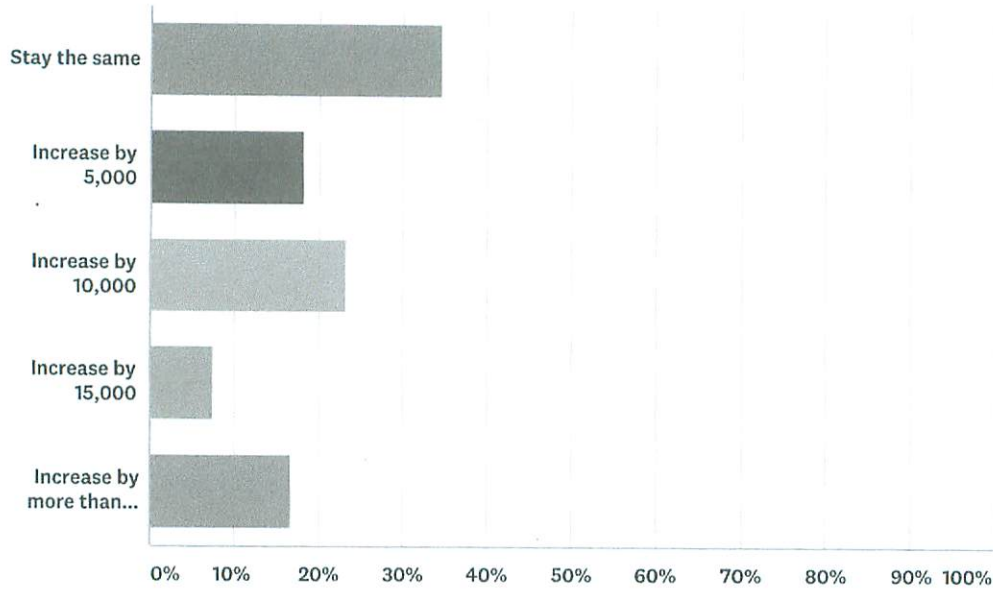
Answered: 246 Skipped: 39



ANSWER CHOICES	RESPONSES	
Extremely important	28.86%	71
Very important	19.11%	47
Somewhat important	20.73%	51
Not so important	10.98%	27
Not at all important	20.33%	50
TOTAL		246

### Q4 Would you like to see the population of Lompoc (about 44,000) stay roughly the same, or increase?

Answered: 281 Skipped: 4

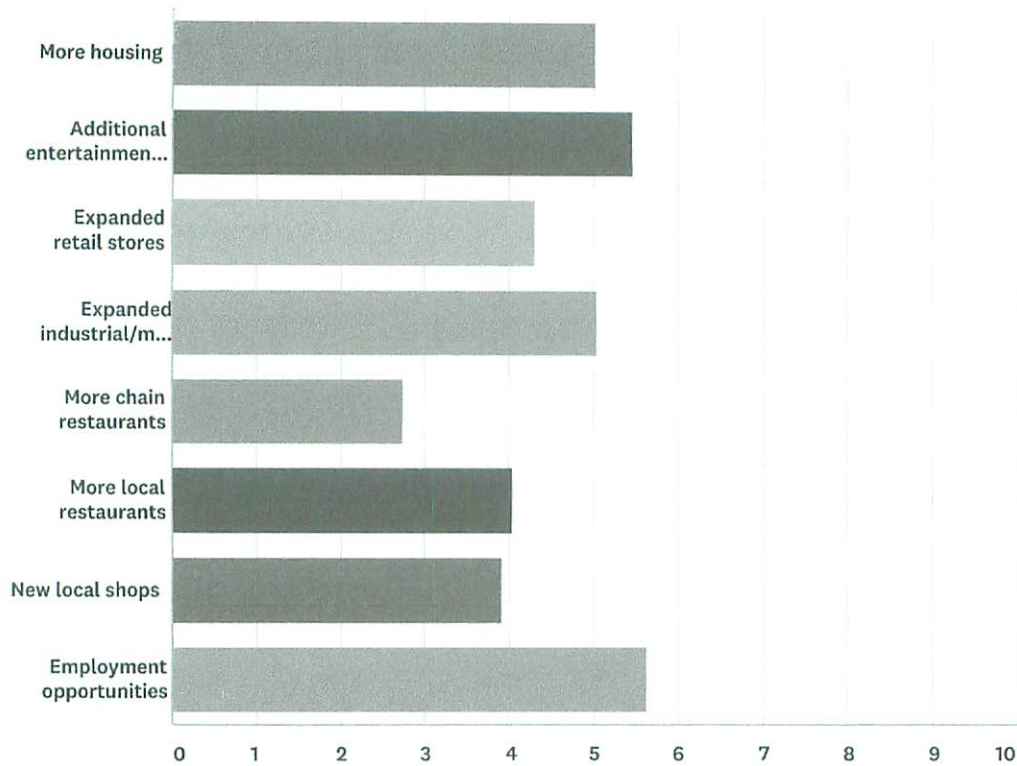


ANSWER CHOICES	RESPONSES	
Stay the same	34.52%	97
Increase by 5,000	18.15%	51
Increase by 10,000	23.13%	65
Increase by 15,000	7.47%	21
Increase by more than 15,000	16.73%	47
<b>TOTAL</b>		<b>281</b>



### Q5 Rank the following areas for potential growth in Lompoc in order of their importance to you.

Answered: 282 Skipped: 3



	1	2	3	4	5	6	7	8	TOTAL	SCORE
More housing	23.85% 62	13.08% 34	11.54% 30	9.23% 24	10.38% 27	13.08% 34	6.15% 16	12.69% 33	260	5.03
Additional entertainment (movie theaters, bowling alleys, sports centers)	23.13% 62	15.30% 41	16.04% 43	15.30% 41	10.07% 27	8.21% 22	5.60% 15	6.34% 17	268	5.47
Expanded retail stores	6.51% 17	9.58% 25	13.03% 34	16.48% 43	15.33% 40	15.33% 40	18.77% 49	4.98% 13	261	4.30
Expanded industrial/manufacturing businesses	13.74% 36	17.94% 47	18.70% 49	13.36% 35	7.25% 19	11.07% 29	10.31% 27	7.63% 20	262	5.05
More chain restaurants	4.55% 12	3.79% 10	3.41% 9	6.82% 18	11.36% 30	13.64% 36	14.77% 39	41.67% 110	264	2.75
More local restaurants	3.82% 10	6.49% 17	13.74% 36	13.74% 36	17.56% 46	21.76% 57	17.56% 46	5.34% 14	262	4.03
New local shops	2.61% 7	10.45% 28	9.33% 25	14.55% 39	19.40% 52	14.55% 39	19.03% 51	10.07% 27	268	3.92
Employment opportunities	24.64% 68	23.91% 66	14.13% 39	10.51% 29	8.33% 23	2.17% 6	5.07% 14	11.23% 31	276	5.63

**Q6 Detail any thoughts or concerns you have regarding land use or growth in the Lompoc Valley.**

Answered: 185 Skipped: 100

## Q6 Detail any thoughts or concerns you have regarding land use or growth in the Lompoc Valley.

Answered: 240 Skipped: 134

#	RESPONSES	DATE
1	I am concerned that pot growers will expand to the west and thus leave our neighborhood Smelling like Carpinteria.	5/13/2019 4:15 PM
2	We do not need to allow any more LOW INCOME housing. We have a disproportionate amount now - the highest in the county. We need leadership, strong infrastructure to handle what we have now. If we are to grow and expand: jobs , police and fire and parks are critical. WE cannot take care of what we have now.	5/13/2019 4:02 PM
3	The city's over abundance of low income and non owner occupied residential has caused an extraordinary increase in crime and blight over the past several years. Lompoc needs to focus on bringing business and entertainment that will attract a broad base of employed people to own and occupy residences in the city.	5/13/2019 2:32 PM
4	As a local business owner in this town for 20+ years, the City of Lompoc's slow growth is pushing us farther away from local competition. A mindset as well as economic outlook shift must undergo throughout the in city order to push past the surrounding cities. Lompoc has plenty of future potential, it comes down to using our assets.	5/13/2019 2:24 PM
5	We need to grow our boundaries in order to attract more buisnesses to enter espcially to help VAFB	5/13/2019 2:03 PM
6	There needs to be something developed for kids to do. I'm tired of spending my money outside of Lompoc because there isn't much to do for my children.	5/13/2019 1:12 PM
7	Lompoc needs the ability to grown for housing development and for commercial real estate development. We need to push our borders to allow for good business growth that will lead to higher paying jobs and a robust economic growth.	5/13/2019 12:48 PM
8	If done with care both Land Use and Growth Could help the Valley with it's Problems also we should be Capitalizing on the Many Space Programs going on at our Door step.	5/13/2019 11:34 AM
9	No more low income housing	5/13/2019 11:22 AM
10	The Lompoc Valley has extraordinary potential given its geography and proximity to VAFB. Embracing future goals and expansion is the only way the Lompoc Valley can capitalize on its potential.	5/13/2019 11:14 AM
11	Restrictions by LAFCO and Santa Barbara County have lead to a housing shortage and dramatic price and rent increases for Lompoc residents. This is the opposite of the Social Justice concept in California law!!!	5/13/2019 10:56 AM
12	Growth in Lompoc is important to its future success.	5/13/2019 10:06 AM
13	I was unaware that city limits were already past the drive in theater. But you want to use water resources from outside of the valley. You want the money of the Mission Hills and the Village but we have NO say in Lompoc government.	5/13/2019 10:03 AM

14	The median income of households in this City is a measly \$49k. This provides an allowed home purchase at just above \$200k. I'm sad to say this is not a City where the American Dream is readily achievable. If Lompoc annexes more land it needs to ensure development of "affordable housing." This means housing that is "affordable" to the population at their current household median income. This does not mean "low-income" housing. I do not believe the City as an entity knows the difference. Building more \$600k homes on the hill will do nothing for the large majority of the underestimated 44,000 people in this City. Honestly, if I could afford something \$600k+, I would leave this failing, gang-ridden, politically imprisoned City, and purchase in a City with a supported set of services (police, fire, parking) such as the three up-and-comers: Buellton, Goleta, or Orcutt area. We have failing commercial in this City partly due to this shortfall. We need more homes before we need more/new commercial. We do not have enough population to support our current businesses. This is the age of online shopping. (The avenue in which this survey is conducted is evidence of my point, as this used to take several people to do.) But, in the end you all will do what you want, while we the Commoners, either burn or sift thru the ashes. The current state of the City is eerily similar to the fall of the Roman Republic, (Not the well-known Roman Empire, read "republic") and I would suggest a brush up on that story. Mosby, Starbuck, Vega, and their Daddy Linn, serve to add no help or promise for development in this City, only uncertainty and fear.	5/13/2019 9:05 AM
15	Need directed growth and a vision of Lompoc beyond what has been discussed to date.	5/13/2019 8:29 AM
16	The city has a massive homeless problem it needs to deal with. The city offers little in the way for jobs or affordable housing. Until these are rectified, Lompoc will always struggle with crime and be less desirable to live in. The city wants to expand to tax more people because they don't know how to manage money in the first place.	5/13/2019 8:05 AM
17	We are already a bedroom community for Santa Barbara. More houses without more jobs will cause a greater loss of sales tax dollars which equates to bankruptcy for Lompoc.	5/13/2019 7:42 AM
18	Get more working tax paying people instead of welfare section 8 families	5/12/2019 8:03 PM
19	Not for growth at this point. Not enough public safety staff in place. City Counsel say it's a priority but refuse to pay for it or let voters decide. Not proponent of dense housing. Lompoc has too much dense housing and that creates ghettos.	5/12/2019 11:53 AM
20	More growth means more tax \$	5/12/2019 7:06 AM
21	Anything to promote growth in the city. New retail stores and entertainment would be great.	5/11/2019 9:55 PM
22	Lompoc has too much low income housing. We need to mix it up. We need to expand borders, build more houses, create more jobs and job opportunities and we need to reach out to companies like SpaceX to invest in Lompoc. We need nightlife.	5/11/2019 9:47 PM
23	Lompoc is very lovely and scenic. The agricultural boundaries are a huge part of that scenery. They should not be developed over. Lompoc will lose its small hometown charm and beauty if it is overbuilt and overcrowded into a bustling city. Everything that makes Lompoc worth living here will be lost! I have experienced this very same scenario in Oxnard. The city became dirty, full of crime, polluted and overcrowded. It lost that neighborly feel. A very important aspect of Lompoc. All my patrons love to talk about how everyone here is so neighborly, kind, and courteous. I would hate to see that lost due to overdevelopment.	5/11/2019 6:05 PM
24	Expansion of housing will kill Lompoc's rural charm and turn it into an ugly city like Santa Maia.	5/11/2019 5:22 PM
25	We need more affordable homes for middle income family's. The family's who work 100+ hours who can't afford their own home while the people who don't give any effort to work get assisted living and live better then the ones who work and can't afford a better living condition due to us paying the cost of the people on welfare.	5/11/2019 9:23 AM
26	Any physical growth or moving of the City Limits should not be into an area currently in agriculture.	5/11/2019 8:23 AM
27	Designate an aerial fireworks area and provide permits and allow any and all fireworks in that designated area for New Years and the 4th of July. Could also be used as a model rocket site promoting the space program.	5/11/2019 8:05 AM
28	We need a vision, and make decision based on that vision .Lompoc never knows what it wants to be. You also can not grow and attract anything without a safe community. Public safety has to be a priority.	5/11/2019 6:35 AM
29	Need better parks to handle quality of life if we grow. Need better schools to grow and need more public safety personnel to care for and respond to growth!	5/11/2019 6:31 AM

30	Would like access to the beach everyday, all year round. I would like Vandenberg to donate surf beach to the city of Lompoc to upkeep. Access to the beach has the potential to increase physical health and mental health for Lompoc residents.	5/11/2019 2:30 AM
31	More concerned about the appearance of the city. Since the drought the citizens have let their yard go to weeds. It is looking pretty run down.	5/11/2019 12:36 AM
32	Think what's best for the community in terms of practical and not be over zealous	5/10/2019 11:34 PM
33	Emergency access and egress routes, such as McLaughlin (sp?) Road. Big problem when we had fires here.	5/10/2019 10:14 PM
34	Economic growth is important. I think it is also necessary to have more employment opportunities. There are so many Lompoc residents that commute, it's a shame so many have to go out of town for work. I also believe it is imperative for us to remember the importance of incorporating natural elements (trees, plants, etc) around our city. Not only have studies shown nature decreases anxiety & depression, but it also helps with the aesthetic of our city.	5/10/2019 9:29 PM
35	Filling in existing space should be a priority. However, growing the city limits to accommodate housing should be considered.	5/10/2019 9:27 PM
36	Water is the most important issue. We do not want to become like Santa Barbara and have the water issues they have. We also need manageable growth. Lastly would prefer if this DID NOT become the Pot Shop Mecca!! Allowing more of these shops then liquor stores is ridiculous. Keep Lompoc a place for families to come and visit.	5/10/2019 9:17 PM
37	Let Mr. Bodger change zoning on his land. He could have some plans drawn up for a wine emporium that would accommodate 100 of the 122 wineries on the central coast. The emporium could be built in three phases not for rent but for sale. Each space could have a kitchen as well for their chefs to prepare tapas style dishes that pair well with the wine each business specializes in. The city could benefit from the sales and property tax.	5/10/2019 6:51 PM
38	I would like to see more infill. Do not support Bailey Ave. housing. Would like more quality options in Lompoc and fewer dollar type stores. If Target can bring a curated store to Santa Barbara, they can do this for Lompoc - a smaller store with middle income products instead of junk and seconds everywhere.	5/10/2019 6:34 PM
39	If we're insolvent at this size, why grow? We need more money circulating within the city. Don't double down on being a bedroom community for Santa Barbara.	5/10/2019 6:07 PM
40	Lompoc city could grow to encompass Vandenberg Village, but should concentrate more on improving the renovations within the city more than the expansion OF the city.	5/10/2019 5:46 PM
41	There will be a need to expand staffing for police department, upgrade fire department equipment and staff to respond to the needs of our community	5/10/2019 5:24 PM
42	One major issue is: if we expand we must expand our police and fire forces and call for additional AMR to assist with increased area and call volume for Police and Fire.	5/10/2019 5:16 PM
43	LAFCO MUST allow Lompoc to grow beyond its boundaries, as there is only so much infill to be had. We have residents commuting to the higher paying tech jobs in Goleta, and to a lesser extent, Santa Maria/SLO, and there is opportunity to bring those businesses here and have them build satellite offices where rent is inevitably lower and their workers already live. We already have a Raytheon office and the DenMat headquarters, so why not more defense contractors and other tech jobs? Too often I see Lompoc residents saying the new housing being built is too expensive for the average citizen and that we need more affordable housing. That is a education problem and the City could do its part to broadcast the too-large share of affordable housing we already have, which generates no tax revenue. Tell the city residents why these new homes are needed, tell us why we need to stop being so negative about our own community and why supporting our local businesses and events is so important to tax revenue. Also, the PR issue with City Hall and its so called "Open for Business" status, as that is NOT the general feeling of the community. People will also cry out that we're expanding into "prime ag land" and that will need to be combated immediately with a PR campaign.	5/10/2019 4:40 PM
44	The low vehicle traffic of Lompoc is largely what attracts me to the area. City expansion should be planned in such a way that it keeps traffic moving smoothly.	5/10/2019 4:09 PM
45	Community garden is a good idea	5/10/2019 3:50 PM
46	I am tired of having to go to Santa Maria to shop! We need a Costco, clothing stores and housing!	5/10/2019 3:48 PM

47	This city is looking more deteriorated. We became stationed here 10 years ago and it was nicer then; businesses had more nice flowers out front, landscaping all over the city was nice and kept up and there were less vacant buildings. Now many vacant buildings are abundant and new businesses have closed after not thriving just a few years later. The city is full of weeds and looks unkempt. Graffiti on our historical buildings are increasing, and many of the buildings and areas that used to look nice look worn, tired, and unkempt. My husband retired from the Air Force in 2015 and we bought our first home here on South H and love this town and chose not to move back to the East Coast. Even the Southside and the historical aspect of it is becoming run down. It's a shame. It's not about expanding out into the vacant land surrounding us, it's all about making this town better and that begins with the upkeep of what already exists and improving the vacant buildings and areas that need enhancement. How do smaller cities like Los Alamos and Los Olivos manage to thrive?	5/10/2019 3:46 PM
48	Lompoc needs to invest itself to grow and be prosperous.	5/10/2019 3:32 PM
49	We need affordable housing for the middle class. Burton Mesa Ranch and Summit View are far too expensive for the demographics Lompoc is currently showing.	5/10/2019 3:29 PM
50	Lompoc will never be a major city but it needs to grow to survive.	5/10/2019 3:26 PM
51	We need way more police officers	5/10/2019 3:25 PM
52	Let's grow	5/10/2019 2:47 PM
53	Incentives to build new houses (not condos) in the 350k-450k range. Plans to reduce section 8 percentage. Communities can vote on pot free neighborhoods. Limit HOAs.	5/10/2019 1:27 PM
54	More affordable housing for middle class who live and work in Lompoc. Only people who can afford housing are people who have high paying jobs outside of the city. Lompoc residents aren't buying homes in Lompoc. People who work in Santa Barbara or Santa Ynez valley buy these homes because they are cheaper.	5/10/2019 12:59 PM
55	City safety is key to improving healthy city growth. If people don't feel safe they wont invest or nest.	5/10/2019 12:30 PM
56	Be the best small town we can be. Keep agriculture prime. Encourage more local small businesses. Enforce cords - clean up entrances to city and neighborhoods. Put empty commercial buildings to use before building new.	5/10/2019 10:30 AM
57	I feel that the City of Lompoc has a history of poor decisions regarding housing development and policy—subsidized housing and tract homes are not the way to create lasting economic growth. In contrast they seem to be doing right by small business owners and I hope to see that continue.	5/10/2019 10:01 AM
58	We need AFFORDABLE housing in order to bring in more hospital and police and fire staff from other communities to live HERE.	5/10/2019 9:59 AM
59	This city has not taken growth seriously. We have so many empty stores. For example the old Mervyn's, do any of you remember that store? it's been that long ago. We can rename small, and let all the shopper's go to Santa Barbara and Santa Maria to get what they are looking for. I know I do, and I take the bus or get a ride when I can to get entertainment or shopping done.	5/10/2019 9:55 AM
60	I would like to see some land put aside for the homeless, to help control their population. Having that population so prevalent around town, makes it seem run down. I would like to improve the image of Lompoc. More industries could help increase jobs, maybe that would cut down gang violence.	5/10/2019 9:54 AM
61	Concern about properly funding emergency services and getting rid of any deficits that are in our budget.	5/10/2019 9:43 AM
62	It's nice to have open land in the area. It's a part of the appeal to the area, putting in to many developments will take away the appeal.	5/10/2019 9:16 AM
63	Of course I want the town to thrive and grow and become a more profitable and popular center for travel and living but preserving open space and agriculture is an important part of what Lompoc is.	5/10/2019 8:54 AM
64	The City must be allowed to grow.	5/10/2019 8:21 AM
65	Just want crime to not be a problem and reduce number of homeless.	5/10/2019 8:03 AM
66	I feel Lompoc needs to clean up the center of town to attract those who have a choice of where to live before trying to grow. Currently we're seen to attract primarily lower income individuals which doesn't help our tax base.	5/10/2019 7:49 AM

67	Bring back the flowers	5/10/2019 7:46 AM
68	Open up the river bed and Burton Mesa for mountain bikes, sponsored Trail runs. More half and full marathons.	5/10/2019 7:44 AM
69	Expanding the boundaries allows for the city to collect more taxes for residents and businesses. The agriculture in Lompoc is all county land. Lompoc doesn't benefit from them financially. If housing expands, we need more single family homes that will draw nicer people to the area (families). No more apartment buildings. Small, affordable single family homes should be sought after when working with a developer- not huge state of the art \$500k plus homes. Make it easier for businesses to come into Lompoc. There are a lot of empty commercial buildings, we don't need more commercial buildings built just to sit empty. Anything that adds more jobs to the area, in particular well paying careers, should be fully supported by the city. The city needs to work in cooperation with business and developers willing to invest money in our town, not against them.	5/10/2019 7:37 AM
70	Lompoc needs more middle-class housing. We have a very high percentage of low income housing and also high income houses. Will I need to move to Santa Maria/Guadalupe since they are offering more growth/opportunity?	5/10/2019 7:33 AM
71	Lompoc has little to offer our youth as far as access to trade schools, hands on training, employment or programs to get experience and real life experiences so they have a good start in right direction vs easy money associated with crime/drugs. I would love to see a center similar to Workforce in center of town where regardless of income teens - 21 yrs old can seek assistance with job searches, enroll in jobs teach basic social etiquette and how to dress. Encourage local businesses to take in teens for a few weeks and give them temp jobs to gain designed real experience for resumes learn skills such as customer experience, cash handling, inbound/outbound calls, universal skills and some labor experience hotel industry, automotive sells, receptionist and grocery/retail. We need to help them transition from adolescence into young adulthood these programs should not only encourage college but we need trade schools! These kids need real life experiences positive with potential opportunities if they are successful at completion or even a real jobs program like offered in social services but to the teenage population get them proper business casual outfit & shoes and computer access to create update print and apply for employment. Assign an advocate seek local volunteers to help teens through process and solicit local businesses to participate or create a temporary position for volunteers to gain the skills...more questions 8053326977 Heather Ortega. This is all possible and can be done if we all believe and allocate the resources available and utilize properly.	5/10/2019 7:17 AM
72	I don't want a race track or businesses around the housing areas around Central Ave.	5/10/2019 7:03 AM
73	Create more of a tax base to provide for essential services by providing incentives for housing and businesses	5/10/2019 6:52 AM
74	I would love to see Lompoc grow some day, but I don't think expansion is the best choice with all of the problems we're having in our town. Fix the big issues, then expand. There's plenty of empty buildings and places to build within the city limits.	5/10/2019 6:51 AM
75	I'm a born and raised Lompoc native that has seen the city go through a lot. I would love to see a better, more vibrant downtown district, greater support for adding and expanding local businesses and restaurants (no more chain stores!!!) but most importantly a stronger support for the arts (music, entertainment, shows, etc.).	5/10/2019 6:43 AM
76	My family has been in the Lompoc Valley for five generations. While I am not entirely opposed to growth, I believe that more focus ought to be placed on enhancing the building and facilities that we already have, cleaning up parks and public spaces and beautifying our streets and natural surroundings. We have so much to be thankful for in our quiet space away from the hustle and bustle of big city life. I think that's why so many people like it here. Those who complain have likely never lived outside of the area and are unaware of how lucky we are to be living here.	5/10/2019 6:31 AM
77	Placement of businesses that generate noise and unattractive odors near residential areas.	5/10/2019 6:23 AM
78	Older homes should be sold with a reduced property tax rate and interest rate for owner-occupied purchases to make them more attractive and keep them from becoming dilapidated rental properties.	5/10/2019 6:07 AM
79	Lompoc needs to grow its economic base. The city can't afford the City Hall that's been built up over decades.	5/10/2019 6:01 AM

80	'Growth' always means more traffic, more congestion and we all know the infrastructure is fixed and already tapped out. Cities that seek a growth agenda always destroy the quality of life for the existing population. Lompoc doesn't need more people; it needs fewer people who are a net tax drain. Even the City Manager said so. Quality—not quantity.	5/10/2019 5:57 AM
81	It's time to grow instead of being a small community with no future	5/10/2019 3:27 AM
82	I worry about the quantity of cannabis shops in town. Additionally I've heard one will be placed in the 100 B. North V St. near a church, a dance studio and a drug recovery meeting location.	5/10/2019 2:14 AM
83	More entertainment	5/10/2019 12:29 AM
84	I think maintaining agricultural land is important in general and to the beauty of our valley. I am somewhat concerned that, living near V st, we can smell the chemicals sprated during the night nearby. Also, housing,, at present, is very expensive and difgicult to find, especially rentals for families. Increasing local jobs would, hopefully , result in moreretail stores and other businesses. Many people, including ne, currently shop in other cities because if the limited shopping choices in Lompoc .	5/10/2019 12:23 AM
85	Would be nice to aquire Bodger property between V st. and Bailey bordered by Olive Nd Ocean Ave. to build a sports complex and perhaps use as new site for festivals.	5/10/2019 12:06 AM
86	Need to take care of what we have Parks need to be redone like Thompson then kept up. Thompson grass is already failing because maintenance was not done properly. Nothing new should be built until the old is redone and fixed and PROVEN to be kept up regularly and maintained	5/10/2019 12:05 AM
87	Plant more trees, return the fields to nature, fix up the existing housing instead of building more bland cookie cutter places. cheers	5/9/2019 10:23 PM
88	More walkability, arts, old town revitalization. No more chain restaurants	5/9/2019 10:22 PM
89	We need to provide sufficient area for job creation.	5/9/2019 10:15 PM
90	Why is Lompoc protecting agriculture, an industry that uses foreign worker at the expense of local jobs and hosuing.	5/9/2019 10:09 PM
91	More family places to enjoy ☺	5/9/2019 10:03 PM
92	With all the kids sports activities a sports complex would be nice one that is kept up not full of gophers. Can attract tournaments that can help bring revenue to the city with hotels restaurants	5/9/2019 10:01 PM
93	We need to let more businesses in. Target, Trader Joe's etc there's no where to shop and hardly anything to do here except the movie theatre and Walmart. Bring back the bowling alley, skating rink, fun stuff for kids and families.	5/9/2019 10:00 PM
94	I think beautifying the roads and other places in the area should be done before expansion. Also expand with only affordable housing	5/9/2019 9:50 PM
95	The crime is getting out of control!	5/9/2019 9:49 PM
96	I would like to see controlled growth within the existing city boundaries. We have so many empty buildings and storefronts that can be utilized rather than building new ones and increasing sprawl.	5/9/2019 9:41 PM
97	We need Land for outdoor recreation. Cycling lanes, multi use bike hike trails. Like San Luis Obispo county.	5/9/2019 9:37 PM
98	More stuff to do in town	5/9/2019 9:34 PM
99	Allow the world to proceed as it should. Legalize brothels. Let people drink in public. Let businesses sell liquor at their establishments. Let people grow/manufacture, process, and enjoy cannabis products without being taxed or persecuted to death.	5/9/2019 9:30 PM
100	Existing zoning may need reorganizing, with a more progressive view to allow existing businesses to expand and diversify. Property owners, especially on main thoroughfares must be held responsible for the upkeep of their landscaping. Some of our roadways look like scenes from the zombie apocalypse.	5/9/2019 9:29 PM
101	Provide those arenas that will be supported by the residents. I.E. Soccer fields, paint ball course, more trails and bike paths.	5/9/2019 9:21 PM
102	More retail stores	5/9/2019 9:09 PM



103	Instead of expanding the city and building on agricultural lands, I would like to see the vacant lots and stores utilized.	5/9/2019 9:05 PM
104	Expand Central Ave to the 246	5/9/2019 8:55 PM
105	Why is it taking so long to move forward with the Bailey Ave. Corridor? Let's stop stalling with new housing development. Guadalupe and Buellton are adding new housing; Lompoc is stagnating.	5/9/2019 8:44 PM
106	Cultural resources of the native chumash indians.	5/9/2019 8:40 PM
107	More family oriented places.	5/9/2019 8:38 PM
108	I think that the land use should stay as it is. We do not need any new companies coming in and using the land for their personal gain. If it doesn't better the city it shouldn't be here. We don't need any more soccer fields or housing. The town is not big enough to support the growing housing developments. All of that will take away from what Lompoc is... that perfect small town.	5/9/2019 8:13 PM
109	Crime is a major concern; it would be great to put more emphasis on reducing crime in the city! Don't expand city onto agricultural land or into natural areas.	5/9/2019 7:53 PM
110	I don't really have any at this time.	5/9/2019 7:26 PM
111	Zoning sometimes doesn't make sense. Water treatment plant upwind? Storage unit right next to apartments and housing...etc. too many empty buildings in retail. Or old buildings . Rather see them demolished than empty and ugly.	5/9/2019 7:24 PM
112	Rope in the marijuana. Don't approve a lot of marijuana businesses. Hire more policemen and firemen. Pay them more.	5/9/2019 7:21 PM
113	Lompoc is a small town off Highway one, however it has too much of a low income population (nothing against them). It would be nice to have more jobs in town, which would in turn generate more revenue for the city / allow more opportunity to act like a town off highway one.	5/9/2019 7:12 PM
114	I've seen growth for the sake of growth ruin the quality of life all over California and I don't want the same thing to happen to Lompoc.	5/9/2019 7:05 PM
115	the city needs new businesses in order to grow. Those businesses will draw new residents who need housing close to work. Both new businesses and new housing will require land beyond our present borders	5/9/2019 7:01 PM
116	Safety for our residents. Quality businesses that could bring revenue and jobs to our area. Our family is auto sports people rather than traditional sports. We would have supported the motor sports complex.	5/9/2019 6:43 PM
117	N/a	5/9/2019 6:28 PM
118	More affluent demographic	5/9/2019 6:20 PM
119	Too much of the city's land is unnecessarily designated for car use (i.e. parking lots and oversized streets) making walking, biking, and living in Lompoc miserable despite having moderate weather and excellent vistas.	5/9/2019 6:18 PM
120	No one should be forced to have to use their land a certain way unless it was zoned that way when it was purchased. We do not need more housing here in Lompoc, our resources are stretched enough and more people will only make that worse. Before we think about expanding, we need to figure out our budget issues. Then look to bigger and better things...	5/9/2019 6:12 PM
121	Need 1 and 2 bedroom single family small homes 800 to 1200 s.q ft with small yards and 1 car garage Huge demand. Need to open opportunity for a home for single people with children. Currently their only opportunity for housing is an apartment	5/9/2019 6:00 PM
122	Lompoc needs more parks within walking distance of schools, bus stops, high density neighborhoods etc. These parks would have to be designed properly to cater to the older and younger population. More parks means more youth will spend their time outside socialising and developing their creative imaginations, rather than participating in unnecessary behavior. There are lots of vacant lots throughout Lompoc that can be repurposed and transformed into positive environments for residents of all ages.	5/9/2019 5:37 PM

123	The city of lompoc has already agreed to not exceed the existing established agriculture boundries established to the west of the city. Lompoc doesn't need additional housing when it doesn't fully utilize its existing footprint. I can't help but to suspect that this has something to do with Santa Barbara county dumping more low income housing on Lompoc. Maybe Santa Barbara should expand its boundries for more housing since a large portion of Lompoc residents commute more than 120 miles per day to Santa Barbara for work.	5/9/2019 5:30 PM
124	There are still a lot of homeless people living in front of stores, in the riverbed, etc.	5/9/2019 5:15 PM
125	Affordable housing - defined as well below the current unaffordable market rates - need to be a priority - or none of the other issues matter because people can't afford to live here.	5/9/2019 5:10 PM
126	Without sound infrastructure like a new fire department, fibreoptic internet options, and better cell coverage for phones no business or person the Lompoc Valley is not in a position to attract businesses and people.	5/9/2019 4:46 PM
127	Please make more land available for private development. We need more growth, more people to use the facilities Lompoc residents have paid for over the last 20 years. Try to lure more business here, more manufacturing from Aerospace, more local initiatives to benefit from the NASA and AFB facilities we have. Why can't we integrate that into our community, rather than some noisy Motorsports park? Can't we keep the business we already have, lower the amount of Section 8 housing units, clean up the vagrants and send them to Santa Monica or other cities that sent them to us? STOP taxing the business we need, stop luring big box stores here. Why not promote more farming? The one thing Lompoc was known for is gone, but we can evolve and prosper. We just need to stop catering to the retirees and pensioners that, while a bedrock of our community, do hamper the issues of today. Like not wanting to ask the community to vote to pay 1% more in sales tax to pay for basic city services.	5/9/2019 4:41 PM
128	Growth to the north, not in prime agricultural land in the valley.	5/9/2019 4:17 PM
129	Keep the "slow growth" policy and ask the surrounding land owners to enter into the "land Conservatory" program.	5/9/2019 3:35 PM
130	Growth should be to the north, including annexation. Business regulation and oversight should be reduced.	5/9/2019 3:12 PM
131	More open space, parks and trails for the community.	5/9/2019 2:51 PM
132	More jobs are needed in the area. Make this an attractive areas for software developers, IT, military contractors. It's cheaper than LA or the Silicon Valley. VAFB has a growing need for developers, and defense contractors. Make Lompoc a place they want to stay when they visit on business, or live here after visiting.	5/9/2019 2:49 PM
133	Environmental impact concerns	5/9/2019 2:22 PM
134	It would be nice to utilizes all the empty buildings in town first for new businesses. It is hard to understand how the Santa Maria Valley has grown so much in the last 10 years and Lompoc stays stagnate.	5/9/2019 1:58 PM
135	We need more access to recreational areas: Hiking, biking, beach. The parks are too poorly maintained for use and so much of the natural areas are off limits.	5/9/2019 1:29 PM
136	Apartments	5/9/2019 1:22 PM
137	Less marijuana stores	5/9/2019 12:36 PM
138	I don't want already established businesses effected by changes. Leave agriculture and Skydive Santa Barbara alone.	5/9/2019 12:05 PM
139	We need more affordable housing	5/9/2019 12:04 PM
140	public safety is number one. don't expand unless you have the services to protect. and stop asking the public these things. You're elected to lead, not survey	5/9/2019 11:57 AM
141	Stop buying property & finish the projects you have now. Stop spending time mowing dirt plots of land & start taking care of our parks. Stop trying to talk about everything & become more business-friendly, specifically in the planning department & building inspector and stop slowing or getting in the way of any growth. Start hiring locally, not out of towners.	5/9/2019 11:49 AM
142	No more homeless	5/9/2019 11:42 AM
143	Use of existing empty lots or buildings.	5/9/2019 11:30 AM

144	I grew up in Lompoc, but I don't live there anymore, and I hope to return someday. Lompoc's location and climate are perfect for substantial economic and residential expansion. The farms to the west of the city are not the best possible use of that land, and in the long term, I would like to see the city expand as far west as possible.	5/9/2019 11:28 AM
145	Annex the Bailey Street edition and Floradale as area of interest.	5/9/2019 11:27 AM
146	be careful not to encroach on current ag use lands. Other than that property rights of owners should be priority.	5/9/2019 11:24 AM
147	I agree with development to the South/West and North and an increased focus on infill. Not development East of the Santa Ynez River.	5/9/2019 11:24 AM
148	More aerospace and military industry companies should be asked to come or given incentives to come here. We have Vandenberg right on our border.	5/9/2019 11:07 AM
149	Expansion needs to be in the hills and in non-agricultural areas. Specifically any area currently being farmed or that has ever been farmed should be off limits. Hills, ravines and chapparal should be where development happens.	5/9/2019 10:24 AM
150	The water and not enough police	5/9/2019 10:04 AM
151	Open land should be made bicycle accessible and friendly. Trails!	5/9/2019 9:53 AM
152	Leave the fields alone and build in the scrub lands off the wye	5/9/2019 9:41 AM
153	If we are having limited police and fire capabilities, there is no way we should up the boundaries.	5/9/2019 9:37 AM
154	Do NOT remove any existing parks for residential or business expansion. Keep the existing farmland for agricultural use only.	5/9/2019 9:26 AM
155	Investigate infill to eliminate unsightly vacant properties	5/9/2019 9:13 AM
156	Support and encourage and honor Lompoc's inherent talents, uniqueness and heritage	5/9/2019 9:09 AM
157	--Infill, don't sprawl. --Center the town's focus on Old Town (downtown) revitalization following the Main Street approach that has been successful in other cities. --Focus on public transit, walkability, and bicycle infrastructure. --Incentivize local business and penalize predatory chain-stores that have crushed local business in our town. --Consider a mixed-use housing/craft&industrial/arts neighborhood for the blocks between A st., H st., Ocean, and Laurel ave. --Adopt a neighborhood-based plan that provides for walkable access to fresh produce and other necessities, transit, parks, and social gathering places like small cafes, restaurants and bars. --Promote community and boost the local economy by promoting arts and entertainment as a focus of Old Town. Encourage several venues of different sizes for live music and other performance. --Encourage small, organic farms and gardens within city limits, and surrounding the city. --Preserve or create housing, services, and amenities for people of all income levels.	5/9/2019 8:59 AM
158	Lompoc needs additional land available for annexation.	5/9/2019 8:52 AM
159	annex from the mission to surf beach	5/9/2019 8:49 AM
160	None	5/9/2019 8:32 AM
161	Keep some land open so kids can actually go out and be kids playing in open fields, seeing lizards, snakes. not sticking them to just city life and seeing homeless people all day long.	5/9/2019 8:32 AM
162	We need this as a city! Growth will bring more revenue, we are a stagnant city that's slowly falling apart because our people spend their money elsewhere. No money is being put back into our community. Our children will suffer and our people will suffer, expansion and change is exactly what we need	5/9/2019 8:20 AM
163	Develop community solar on land adjacent to Santa Ynez River bed.	5/9/2019 8:20 AM
164	I believe what Lompoc is in desperate need of more employment opportunities with higher pay. Bringing manufacturing jobs will keep the people of Lompoc in our town so they don't have to travel outside for work. Most people commute an hour or more to the next city just to get a decent paying job, but with gas prices continuously on the rise it makes it so you are using most of that pay just to get to work and back every day to make a living. It's simple, more local jobs means the money that is being spent elsewhere will be spent here instead, and thus stimulating our local economy far greater than anything else ever has.	5/9/2019 8:12 AM
165	Lompoc can not support the area they have now. Expanding without the resources needed would be bad.	5/9/2019 8:10 AM

166	no more ghetto expansions please	5/9/2019 8:09 AM
167	We need economic growth before physical, if the city and its population grows without economic opportunity growing the homeless population and problem will grow	5/9/2019 8:09 AM
168	Keep local farming.	5/9/2019 7:59 AM
169	We need to NOT encourage all the subsidized housing, Lompoc has become a welfare magnet. Cars at subsidized housing are new if not nearly new so govt is paying them well	5/9/2019 7:47 AM
170	The City of Lompoc has been limited for years by lack of physical growth. Housing is a struggle for most to find what they want for both renters and owners. Industrial buildings are not available for new businesses due to the overwhelming wine and marijuana industry and their deeper pockets. Small business owners need access to small industrial sized locations to start up and expand. Recreational use in this area is lacking and was not included in the survey. Commercial space industry is moving in at Vandenberg and bringing with it a younger workforce. Open space for outdoor activities and turning the Santa Ynez river into an asset rather than a homeless shelter should be prioritized	5/9/2019 7:42 AM
171	No processing/mfg plants with potential pollution issues within the city limits.	5/9/2019 7:30 AM
172	please allow for more youth outdoor recreational activities, including motorsports. as well as let us utilize on of our biggest outdoor assets, the riverbed.	5/9/2019 7:07 AM
173	Lompoc has great character and beautiful buildings in its older neighborhoods. Instead of making the city bigger, money and effort should be put into the charm that is Old Downtown Lompoc.	5/9/2019 6:30 AM
174	I think it is important to maintain the small town nature of lompoc .	5/9/2019 6:25 AM
175	Would like to have a policy to encourage and regulate short term vacation rentals. We have many here for wine enthusiasts, VAFB events, etc. but there is no local regulation or policy. I am interested in opening a vacation rental, but not until rules allowing them in neighborhoods are drafted.	5/9/2019 5:56 AM
176	Help and do not hinder new business	5/9/2019 5:23 AM
177	Please bring in businesses that provide a liveable wage instead of all the high schooler minimum wage jobs	5/9/2019 5:09 AM
178	I would benefit if the city would use there current vacate lots and populate those first before expanding. they should build from within before the broken window effect takes place. need more paved roads and beautification of the interior.	5/9/2019 5:07 AM
179	Incentive to builders and businesses to build/open. Streamlined planning and building application process. Modern zoning that simplified the process. Staff that is helpful and positive supporting in the process.	5/9/2019 4:11 AM
180	City should concentrate on corrections the issues they have before expanding territory. Clean up the town, more police and fire personnel. Focus on gang violence. Concentrate on bringing in more working class instead of catering to low income.	5/9/2019 2:27 AM
181	Annex AG land to the east.	5/9/2019 1:53 AM
182	There is no real main concern as long as there is a balance between construction of structures/paths/homes and green space	5/9/2019 12:58 AM
183	Open some land for off road use. If there isn't places for our youth to excersise there energy constructively they will find the opposit.	5/9/2019 12:42 AM
184	Increasing the population that OWNS homes here would be better. A slightly larger population might entice more businesses to open up here in town. It would be nice if we could attract a competitor to Walmart to town so we would have more choices.	5/8/2019 10:42 PM
185	No more low income housing	5/8/2019 10:34 PM
186	To offset the deficit We need to increase the number of tax paying residents. We must stray away from chain businesses as they will not as easily invest in their local communities. I have many ideas, please email me at Hugo.moreno@mindbodyonline.com	5/8/2019 10:17 PM
187	It's time to grow Lompoc towards the Ocean. I understand that we do have the Rocket Launches and such, but we need to start getting our benefits from being this close to the ocean.	5/8/2019 9:59 PM
188	We need to grow and expand. Our city is small and ugly	5/8/2019 9:58 PM

189	Bring in high tech, high paying jobs, not low paying chain stores.	5/8/2019 9:48 PM
190	The proposed housing starting at 500,000 is out of reach for more than 75% of this area. We need more homes such as those being built in Texas that start in the 220,00 range. They are gated communities with pools, parks and trails. They are family friendly and safe. Further, there is nothing to bring people here. Santa Maria seems to have a monopoly on all the better retail chains. There is also a lack of jobs in town most have to work on base to have a descent paycheck. The town has gone down hill fast in the past 5 years. Current laws have let criminals roam free. We no longer feel safe. Taxing people more is not the answer. Getting rid of city extras like commissions, and other non necessity groups would help. Stick with the basics, utilities, garbage/sewage, fire and police and let the rest slide until Lompoc has more of a tax base. There are too many here on assistance and that is what is killing this city besides the liberals laws, gangs, drugs and homelessness.	5/8/2019 9:36 PM
191	I believe growth should only follow highway 1 and 246 west of town	5/8/2019 9:31 PM
192	sell the lots the city owns around town.	5/8/2019 9:24 PM
193	Our city is perfect for cycling and would do well to encourage residents to do more of it. A way to begin to use the space museum land could be to create an outdoor amphitheater both for music concerts as well as for rocket launch viewing. This could be phase 1 of something more significant there. Mostly we need to make our land count when it comes to job creation to lift up our city. Any new housing needs to be uplifting as well... Lompoc is out of balance with too many low income apartments as compared to other cities. The Theater project is uplifting and important.	5/8/2019 9:16 PM
194	Homeless issues	5/8/2019 9:15 PM
195	Local tax revenue must increase as well as greater funding for law enforcement	5/8/2019 9:09 PM
196	Just with growth we need more public safety. Growth will bring better jobs and revenue to the city. Locales will shop and play in Lompoc if it's available.	5/8/2019 8:53 PM
197	Ideas and plans never go passed planning g phase I have no concerns I have lived in cities 3x the same if Lompoc and they have the same problems with crime that we have.	5/8/2019 8:51 PM
198	sales tax increase, charge for building permits and inspections. take advantage of local points of intrest ie V.A.F.B ,COAST LINE AND GOLFING	5/8/2019 8:42 PM
199	Need new affordable housing	5/8/2019 8:42 PM
200	For population and business growth does the city NEED to expand Beyond it's current borders? There are plants of areas for infill and redevelopment. The agricultural lands are a precious resource. You can have both.	5/8/2019 8:39 PM
201	I am extremely concerned about the homeless population. It is the most pressing concern for our city.	5/8/2019 8:39 PM
202	Use land in the city first to try and attract manufacturing/ industrial jobs that provide good pay then expand outside city limits. Try and attract the small launch companies to Lompoc.	5/8/2019 8:36 PM
203	Fill empty stores with quality shops	5/8/2019 8:33 PM
204	My big issue with land use is the mis understanding of traffic. Take a very busy section of town,one of two way out of town. And you allow businesses to be built and yet do not force the owners of the land to make adjustments and work together to add ways for traffic to flow, create exit, entrances to allow traffic other means to the businessea.	5/8/2019 8:31 PM
205	No more low income housing. Bring in business with higher paying jobs and higher levels of education needed to obtain the job. This will help encourage the youth to get a good education.	5/8/2019 8:13 PM
206	Being a 5 generation family who grandparents owned farm ground on flordale ave and parents lived on artesia. I am all for saving the farm land west of bailey Ave Brier creek is already on Bailey. Build south to olive and to V st There already is sewer infrastructure placed on Bailey. We need to grow if this town is ever gonna support the cities obligations , there needs to me more quality jobs. To keep a even split from computers to SB who spend alotmof there Money in SB. Then Lompoc. And then annex all property along river , river park area ect to city. That we pretty much take care at our expense but dictated by county and what can be done.	5/8/2019 8:11 PM

207	Lompoc needs to improve its appearance. Code enforcement needs to be proactive not reactive. The appearance is greatly effecting the attraction of high paying employers. Go to the council meeting where the CEO of Denmat pleaded that the city improve the appearance and the conditions of the city - with emphasis on parking. Although there may be a need to expand the boundaries of the city, it will be far off in the future if those areas are ever developed. The most immediate needs are attracting high paying employers and that will fuel growth in the development of housing and boosting the city's economy. Expanding the boundaries of the city does not solve the economic problems of Lompoc. Attracting wealth is the answer. There has to be a will to improve the city and that will is lacking.	5/8/2019 8:07 PM
208	Would like to see empty shops filled	5/8/2019 8:04 PM
209	I am concerned that the quality of life and the quality of the rural landscape will decline with more growth. This is currently a nice quiet place to live and raise children. It is beautiful and clean with much fewer problems than most big cities.	5/8/2019 8:03 PM
210	None	5/8/2019 8:02 PM
211	Protect agricultural lands in the Lompoc Valley. We do not have much to begin with.	5/8/2019 7:49 PM
212	I want to keep seeing the beautiful flower fields and agriculture in our beautiful valley!!! Too many flower fields have already disappeared!☹	5/8/2019 7:39 PM
213	Zoning. Lompoc needs to start looking for outside help. The good old boys Club mentality is killing this town.	5/8/2019 7:20 PM
214	Land west of Lompoc should be developed with more housing. It's the logical way to expand	5/8/2019 7:16 PM
215	Clear the land in the riverbed...and we can't grow without more cops and fire personnel	5/8/2019 7:11 PM
216	We need to grow, if for no other reason than to spread the burden of the municipal utility cost over more backs. Additional housing would also (hopefully) bring down then percentage of low income housing. As nice is the tiny town is, if we don't grow we die. Would however, be nice to not just be a bedroom community!	5/8/2019 7:10 PM
217	Lompoc is a gem! It's an amazing city. I love that there's no traffic. I think it needs to be more of a tourist destination. Make old town amazing, more wine, a space center and maybe a UCSB satellite campus downtown. Look at piles peak community college in Colorado-down town campus. Such a neat campus. Small but gives people options and brings in some jobs.	5/8/2019 7:04 PM
218	Fields should grow vegetables that don't require insecticides/herbicides and some grazing for cattle/livestock and such would be wonderful.	5/8/2019 7:04 PM
219	DO NOT CUT UP THE AG FIELDS. There are plenty of mountainsides.	5/8/2019 6:59 PM
220	I think Lompoc needs to remember it's past and utilize that so it's future is more unique. Lompoc has an opportunity to be the envy of the central coast of it focuses on renewing and perfecting what it already has.	5/8/2019 6:47 PM
221	Leave it alone. Small town fits us.	5/8/2019 6:35 PM
222	Lots of people parking rvs next to Walmart dumping trash, casino employees need parking parking lot full	5/8/2019 6:35 PM
223	Fix the Budget then worry about expansion. Get a sales tax in place to help then you can focus on growth to help sustain.	5/8/2019 6:33 PM
224	Annex the Bailey corridor!	5/8/2019 6:33 PM
225	To many house properties are not taxed. Large industry such as Space X should have large facilities inside city limits to provide jobs. Increase or encourage family entertainment or bowling allies, batting cages.	5/8/2019 6:32 PM
226	You need to figure out the budget and the police Dept prior to the future building	5/8/2019 6:30 PM
227	Prefer it stay agriculture	5/8/2019 6:29 PM
228	I do not want to see agricultural lands torn up to fit more housing! Lompoc has limited water resources, and expanded housing would put a strain on this when the reality of life in California is drought, despite recent rains.	5/8/2019 6:28 PM

229	As new developments are happening on the outskirts of town, I am overwhelmed thinking about the 1 northern entrance/exit to Lompoc, and 1 southern entrance/exit. (I realize there's also Ocean Ave. that only leads to the beach and Central/Floridale but they don't lead to the new developments). When there is an emergency(fires or the river overflows....what then? There is already a lot of congestion at the Wye. Also, there is really only 1 main road that holds all the retail shopping and restaurants. This can't keep growing without a serious congestion problem.	5/8/2019 6:23 PM
230	Lompoc would not be the same without the agricultural fields, flower fields, vineyards and rolling hills of empty land. We can expand (maybe not even expand, but accommodate people already here with affordable housing) and improve our city without ruining its charm. Something definitely needs to be done about the beach regulations. There has to be a way to protect the plovers and not restrict beach access.	5/8/2019 6:20 PM
231	Lompoc needs more high paying jobs and things to attract tourism	5/8/2019 6:13 PM
232	I worry about the flower/vegetation fields at Central and Floradale being industrialized and losing the beauty of the town	5/8/2019 6:05 PM
233	Lompoc needs to be pro business and pro growth. Reduce barriers to entry for entrepreneurs and expand the tax base.	5/8/2019 5:57 PM
234	A off road motorcycle park ,drag strip , Land for people to use for entertainment	5/8/2019 5:30 PM
235	NO	5/8/2019 5:28 PM
236	What happened to the manufacturing facility that was to be built on Central & V?	5/8/2019 5:24 PM
237	Would love to see flower fields return in greater number.	5/8/2019 5:20 PM
238	The local economy sucks... No decent jobs, places to shop, places to eat... What is wrong with this town and who is running it(to the ground)	5/8/2019 5:13 PM
239	Turn the old mervyns into a target or something.	5/8/2019 5:03 PM
240	Growth needs to happen or the City will be strangled and die. It is unfair to see all other cities and communities be allowed to grow and improve while Lompoc is held back and forced to be the low-income housing center of the Central Coast.	5/8/2019 5:01 PM

# County Of Santa Barbara

**Mona Miyasato**  
County Executive Officer

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*Deputy County Executive Officer*  
**Dennis Bozanich**

May 15, 2019

Paul Hood, Executive Director  
Santa Barbara County Local Agency Formation Commission  
105 East Anapamu Street  
Santa Barbara, CA 93101

Email: [lafco@sblafco.org](mailto:lafco@sblafco.org)

RE: Review of LAFCO Agricultural and Open Space Policy Updates

Dear Paul:

Thank you for the opportunity to comment on the LAFCO Agricultural and Open Space Policy Updates. At this time, the County submits comments from the Planning and Development Department.

If you should have further questions, please do not hesitate to contact me directly, or Lisa Plowman, Director, Planning and Development Department, at (805) 568-2086.

Sincerely,

Dennis Bozanich  
Deputy County Executive Officer

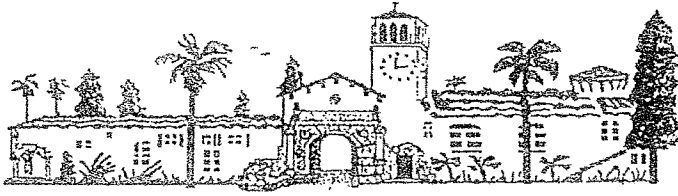
cc: Lisa Plowman, Director, Santa Barbara County Planning & Development Department

Daniel Klemann, Deputy Director of Long Range Planning, Planning & Development  
Department

Enclosure: Santa Barbara County Planning & Development Department Letter, dated May 10, 2019

**EXHIBIT E**





# County of Santa Barbara Planning and Development

Lisa Plowman, Director  
Jeff Wilson, Assistant Director  
Steve Mason, Assistant Director

May 10, 2019

Paul Hood  
Executive Officer  
Santa Barbara County Local Agency Formation Commission  
105 East Anapamu Street  
Santa Barbara, California 93101

**Re: Review of LAFCO Agricultural and Open Space Policy Updates**

Dear Mr. Hood:

The County of Santa Barbara Planning and Development Department has reviewed the existing Santa Barbara Local Agency Formation Commission (LAFCO) Agriculture and Open Space Policies, including the changes proposed as part of the work conducted by the Ad Hoc Committee, and appreciates the opportunity to provide the comments listed below.

### General Comments

1. It is recommended that the proposed policy updates be reviewed by LAFCO Counsel to determine whether they constitute a "project" under CEQA (CEQA Guidelines Section 15378), whether a statutory or categorical exemption applies (Sections 15260-15285; 15300-15332), or if these policy changes may result in a significant effect on the environment pursuant to CEQA.
2. Section IV, First Paragraph: The title of Section IV and heading before the first paragraph include "open space", yet the focus is on agricultural resources. The new paragraph does not discuss impacts to and preservation of areas of high value open space or areas containing important ecological resources. We recommend including language that also emphasizes the importance of open space preservation. In addition, it is recommended that the word "underdeveloped" be added to the fourth sentence to acknowledge the contribution low-density, underutilized lands within existing urban boundaries can have in creating well-planned and orderly infill development. We suggest that this sentence could be modified to state: "By guiding development toward underdeveloped or vacant urban land and away from agricultural land or land of high ecological importance, LAFCO assists with the preservation of valuable agricultural and open space resources."

3. Section IV, Policy 3: The phrase "urban development is imminent," in this policy is ambiguous. It is recommended that the meaning of "imminent" be clarified. A suggested modification is provided: "Proposals to annex undeveloped or agricultural parcels to cities or districts providing urban services shall demonstrate that there is pending development for all, or a substantial portion of the proposal area; and that a planned, orderly, and efficient urban development pattern will result."

State Policy Planning Consistency:

4. Section IV, Policy 1: It is recommended that language be added to clarify what is meant by "well-planned, orderly, and efficient urban development" as these concepts have evolved to account for State priorities such as reducing vehicle miles traveled, building healthy communities that minimize greenhouse gas production, and siting housing near jobs. The following could be added after the first sentence: "This includes building higher density housing near job centers, designing walkable communities with multi-modal transportation options, and projects that reduce vehicle miles traveled and greenhouse gas production. These goals are largely achieved through infill development and re-development within existing urban boundaries."

Mitigation

4. Section V, Policy 6: The suggested mitigation ratio of 1:1 would result in a 50 percent net loss of agricultural lands, and would not fully mitigate impacts to these resources. Although a higher mitigation ratio of 2:1 would still result in a net loss, it would increase the preservation of similar agricultural lands and further diminish impacts to agricultural resources in the County. It is recommended that LAFCO increase the mitigation ratio.
5. Section V, Policy 6.b: In-lieu fee programs are convenient ways for applicants to offset impacts to agricultural resources through farmland conversion. However, in order for this program to be an effective mitigation program, the fee must be established such that the accumulating funds are sufficient to purchase equivalent offset lands. If this policy is pursued, it is recommended that the fee be based on a study of land values and comparative sales, and should be regularly adjusted to account for changes in land values and real estate. Acquisition and dedication of farmlands or agricultural conservation easements are also effective ways to permanently protect farmland.

Memorandum of Agreements

6. Section V, Policy 5: Pursuant to Government Code Section 56425(b), a city and county are required to meet and develop an agreement on development standards and planning and zoning as a precursor to LAFCO considering a boundary change to a sphere of influence. The proposed policy's language should establish a joint goal of agricultural preservation in addition to its focus on addressing impacts of conversion of agricultural lands.

Agricultural Buffers

7. In order to limit the impacts of annexations on adjacent agricultural lands, the County would like to work with LAFCO on incorporating agricultural buffers into any annexation and development plans consistent with the County's Agricultural Buffer Ordinance.

Review of Existing Spheres of Influence

8. The existing Sphere of Influence policies (Policy 2.10) states that high value agriculture should be excluded from urban service spheres of influence. Based on this existing policy, it is recommended that LAFCO conduct a review of existing spheres of influence to ensure lands of high agricultural value are removed.

Thank you for the opportunity to provide comments on LAFCO's Agriculture and Open Space Policy Updates. If you have any questions or require further information, please contact me at (805) 568-2086 or Mr. Dan Klemann at (805) 568-2072.

Regards,



Lisa Plowman, Director  
Planning and Development Department

cc:

Dan Klemann, Deputy Director, Long Range Planning Division  
Whitney Wilkinson, Senior Planner, Planning and Development Department  
File



May 8, 2019

Santa Barbara LAFCO  
Attn: Jacquelyne Alexander  
105 East Anapamu Street, Room 407  
Santa Barbara, CA 93101  
(805) 568-3391

*Submitted via email to [lafco@sblafco.org](mailto:lafco@sblafco.org)*

**Re: OPEN Comments Regarding Revisions to Santa Barbara County LAFCO's  
Agricultural and Open Space Policies**

Dear Members of the Commission:

We are writing to resubmit the attached comments from a diverse set of stakeholders including local ranchers, farmers, and conservationists, originally submitted to the Santa Barbara County Local Agency Formation Commission ("LAFCO") on March 16, 2018, to urge LAFCO to conduct a comprehensive policy review process, revise existing policies, and review local spheres of influence in order to best adapt its current policies to preserve agricultural resources in Santa Barbara County. *See Exhibit A.*

Our organization has engaged in a collaborative process between both conservationists and agricultural interests as part of its Open-Space Preservation and Education Network ("OPEN") program to advocate for the preservation of agricultural lands in Santa Barbara County. As part of this process, the OPEN stakeholder group developed specific policy recommendations for LAFCO to protect agricultural resources in Santa Barbara County, which are set forth in the attached letter. The letter is signed by local agricultural interests including ranchers, the Santa Barbara County Farm Bureau, and the Grower-Shipper Association, as well as local conservation groups.

The OPEN letter provides a background on the importance of preserving agricultural land in Santa Barbara County as well as the importance of agricultural preservation to LAFCO's responsibilities. The letter sets forth recommendations for strengthening, clarifying, and revising specific policies. It also requests that LAFCO evaluate local spheres of influence and reduce them where possible.

We sincerely appreciate LAFCO's interest in reviewing and updating its current Agricultural and Open Space Policies, as well as the time and resources that have been devoted to the Agricultural and Open Space Policies Ad Hoc Committee. However, after reviewing staff's proposed revisions to existing policies, we are disappointed that the edits do not address the recommendations raised in the OPEN letter, such as revising policies to discourage the loss of any agricultural lands and to require feasible infill development over sprawl. We urge the Commission to consider these points in addition to the guidance provided in the CALAFCO White Paper.

Additionally, the proposed change at Policy 5, subsection (6) concerning mitigation is inconsistent with the purpose of LAFCO, existing policy, and the CALAFCO White Paper. 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. To that end, LAFCO Policy 5, subsection (1) states that "[p]roposals which would conflict with the goals of maintaining the physical and economic integrity of ... agricultural lands ... shall be discouraged." Policy 5 must not focus on mitigating for the loss of agricultural lands, but instead promote the preservation of these lands.

Moreover, the CALAFCO White Paper sets forth a hierarchy for agricultural land preservation strategies. The most preferred strategy is to avoid impacts and the least preferred strategy is to mitigate impacts. For these reasons, LAFCO must reject the proposed change and instead prioritize policies that prevent loss of agricultural lands in light of its statutory responsibility.

In conclusion, 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. It is thus imperative for LAFCO to establish effective and protective Agricultural and Open Space policies to discourage expansion onto agricultural lands, and we urge LAFCO to adopt the recommendations set forth in the OPEN letter.

Thank you for your consideration of these comments. Please contact us with any questions.

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May 8, 2019

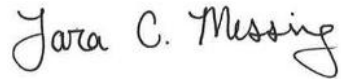
OPEN Comments Regarding Revisions to Santa Barbara County LAFCO's Agricultural and Open Space Policies

Page 3 of 3

Sincerely,



Maggie Hall  
Staff Attorney



Tara C. Messing  
Staff Attorney

cc: Paul Hood, SB LAFCO Executive Officer

Exhibits:

A – Letter from the OPEN group to Members of the Commission dated March 16, 2018

# Exhibit A



March 16, 2018

Santa Barbara LAFCO  
Attn: Jacquelyne Alexander  
105 East Anapamu Street, Room 407  
Santa Barbara, CA 93101

*Submitted via email to [lafco@sblafco.org](mailto:lafco@sblafco.org)*

**Re: Recommendations to LAFCO Regarding Santa Barbara County  
Agricultural Preservation**

Dear Members of the Commission:

On behalf of the undersigned individuals, the Environmental Defense Center (“EDC”) writes to request that the Santa Barbara County Local Agency Formation Commission (“LAFCO”) conduct a comprehensive policy review process, revise existing policies, and review local spheres of influence, in order to best adapt its current policies to preserve agricultural resources in Santa Barbara County. These recommendations were developed by EDC’s Open-Space Preservation and Education Network (“OPEN”) program, which has brought together agriculturalists and environmentalists to advocate for the preservation of agricultural lands in Santa Barbara County.

A major success for the group occurred on April 9, 2013, when the Santa Barbara County Board of Supervisors passed the Agricultural Buffer Ordinance to minimize predictable land use conflicts between farmers and encroaching development over issues like light, noise, dust, and odors. Members of the OPEN program served on the County-convened stakeholders’ group to devise a successful compromise and draft the Ordinance language. The Ordinance signified the first time the County has required setbacks when non-agricultural development is proposed next to agriculturally-zoned land.

EDC’s OPEN program has continued to coordinate with different stakeholders in the agricultural community and conducted a review of LAFCO policy related to the preservation of farmland. We held a series of meetings with diverse stakeholders, including conservation groups and agriculturalists, in which we identified various policy needs for ensuring agricultural viability in the County. In February of 2015, EDC organized a meeting with these stakeholders



and Paul Hood, the Executive Officer of the Santa Barbara County LAFCO, in which the group expressed the importance of LAFCO's responsibility in promoting agricultural preservation and specific areas of LAFCO policy that could be strengthened to best preserve agricultural land.

In this letter, we first provide a background on the importance of preserving agricultural land in Santa Barbara County and the importance of agricultural preservation to LAFCO's responsibilities. We then provide the recommendation that LAFCO conduct a policy review process to examine its authority to preserve agricultural land in Santa Barbara County. We also identify specific policies that should be clarified and revised, and encourage LAFCO to take other actions that help ensure agricultural viability. Finally, we urge LAFCO to evaluate local spheres of influence and reduce them where possible.

## **I. BACKGROUND**

### **A. Importance of Preserving Agricultural Land in Santa Barbara County.**

Santa Barbara County is rich with agricultural resources that are critical to preserve. Agriculture is the number one contributor to the County's economy, providing a total of \$2.8 billion to the local economy and 25,370 jobs.<sup>1</sup> Preserving farmland enhances the rural character of Santa Barbara County and prevents additional urban sprawl.

Additionally, agricultural land has a direct and positive impact on environmental quality.<sup>2</sup> Intensive farming increases the amount of organic matter in the soil, which contributes to soil fertility, limits erosion, and helps retain water. Adopting best management practices in agriculture, such as minimum tillage, returning crop residues to the soil, and the use of cover crops and rotation, contributes to mitigating the greenhouse effect and global warming.<sup>3</sup>

Opportunities remain for agriculture to continue to thrive in Santa Barbara County, but are dependent on land use policies that overcome the significant pressure to convert agricultural lands to non-agricultural uses. The County Board of Supervisors recognizes the need to conserve farmlands within its borders. For example, under Article V, Chapter 3 of the Santa Barbara County Code of Ordinances, the Board of Supervisors found the preservation of agricultural land and operations within the County to be in the public's interest, and declared that such lands must be specifically protected for exclusive agricultural use.<sup>4</sup>

Despite County policies that promote agricultural preservation, EDC and our partners continue to work to prevent the development of agricultural land within the County. For example, in 2011, EDC, on behalf of the Santa Barbara County Action Network and in

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<sup>1</sup> *Santa Barbara County Agricultural Production Report*, SANTA BARBARA COUNTY, p. 2, <http://cosb.countyofsb.org/uploadedFiles/agcomm/crops/2016.pdf>.

<sup>2</sup> *Santa Barbara County Agricultural Resources Environmental/Economic Assessment (Area) Study*, AMERICAN FARMLAND TRUST, p. 5, [http://www.farmlandinfo.org/sites/default/files/SB\\_AREA\\_Study\\_Final\\_12\\_12\\_07\\_1.pdf](http://www.farmlandinfo.org/sites/default/files/SB_AREA_Study_Final_12_12_07_1.pdf).

<sup>3</sup> *Organic Agriculture*, FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS, <http://www.fao.org/organicag/oa-faq/oa-faq6/en/>.

<sup>4</sup> Ord. No. 3778, § 1.

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 Lompoc, CA.<sup>5</sup> 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. This area is again under threat of conversion to urban land uses and a proposed expansion may be presented to LAFCO for a decision in the coming years.

## **B. Importance of Agricultural Preservation to LAFCO.**

LAFCOs exist to encourage the orderly formation of local governmental agencies, to preserve agricultural land resources, and to discourage urban sprawl.<sup>6</sup> LAFCOs are responsible for conducting special studies that review ways to reorganize, simplify, and streamline governmental structure, and for preparing a sphere of influence for each city and special district within each county. LAFCOs must consider the effect that any proposal will have on existing agricultural lands.<sup>7</sup> By guiding development toward vacant urban land and away from agricultural lands, LAFCOs assist with the preservation of valuable agricultural resources. LAFCOs are also intended to discourage urban sprawl that results in the inefficient delivery of urban services (police, fire, water, and sanitation) and the unnecessary loss of agricultural resources and open space lands.<sup>8</sup> Although LAFCOs may not impose conditions that would directly regulate land use or subdivision requirements, they may withhold approval of boundary changes until and unless certain conditions are satisfied.<sup>9</sup>

Past LAFCO actions demonstrate a strong commitment to the conservation of agricultural lands. In 1994, in response to proposed annexations to the City of Santa Maria, LAFCO encouraged the City and County to adopt a green belt agreement as a joint policy pledging to keep specific areas in permanent agriculture. Additionally, in 1998, LAFCO denied the City of Lompoc’s request to extend its sphere of influence west onto prime agricultural land in the Bailey Avenue corridor, and encouraged the City instead to grow onto areas with less agricultural value.<sup>10</sup>

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<sup>5</sup> *Press Release*, ENVIRONMENTAL DEFENSE CENTER, <http://www.environmentaldefensecenter.org/wp-content/uploads/2015/04/11-02-05.pdf>.

<sup>6</sup> *A Call to Action to Preserve California Agricultural Lands*, CALIFORNIA ROUNDTABLE ON AGRICULTURE AND THE ENVIRONMENT, [http://www.aginnovations.org/uploads/result/1431288812-45566a9a64c9cb825/CRAE\\_Call\\_to\\_Action.pdf](http://www.aginnovations.org/uploads/result/1431288812-45566a9a64c9cb825/CRAE_Call_to_Action.pdf).

<sup>7</sup> *What is LAFCO?*, CALIFORNIA LOCAL AGENCY FORMATION COMMISSION, <https://calafco.org/lafco-law/faq/how-does-lafco-work-preserve-agricultural-lands>.

<sup>8</sup> *What is LAFCO?*, CALIFORNIA LOCAL AGENCY FORMATION COMMISSION, <https://calafco.org/lafco-law/faq/how-does-lafco-discourage-urban-sprawl>.

<sup>9</sup> *It’s Time to Draw the Line; A Citizen’s Guide to LAFCOs*, CALIFORNIA LOCAL AGENCY FORMATION COMMISSION, pp. 10-11, [https://calafco.org/sites/default/files/resources/TimetoDrawLine\\_03.pdf](https://calafco.org/sites/default/files/resources/TimetoDrawLine_03.pdf).

<sup>10</sup> Letter on “Possible ‘Study Session’ on Agricultural Preservation,” SANTA BARBARA LOCAL AGENCY FORMATION COMMISSION, [http://www.sblafco.org/docs/03-01-07/Item13\\_Discussion\\_of\\_possible\\_study\\_session\\_on\\_agriculture.pdf](http://www.sblafco.org/docs/03-01-07/Item13_Discussion_of_possible_study_session_on_agriculture.pdf).

LAFCO’s statutory authority and policies support preserving agricultural land. Under the Cortese-Knox-Hertzberg Local Government Reorganization Act, LAFCO’s enabling statute, Section 56300 states that the Legislature intends for each commission to “establish policies and exercise its powers pursuant to this part in a manner that encourages and provides planned, well-ordered, efficient urban development patterns with appropriate consideration of preserving open-space lands within those patterns.”<sup>11</sup>

In reviewing annexation proposals under Government Code Section 56668, LAFCO is permitted to consider various factors, including “[t]he effect of the proposal on maintaining the physical and economic integrity of agricultural lands.”<sup>12</sup> Moreover, LAFCO policy encourages the development of existing nonprime 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.”<sup>13</sup>

The LAFCO Commissioner Handbook also sets forth policies that encourage conservation of agricultural lands. 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.”<sup>14</sup> With regard to “Sphere of Influence” determinations, agricultural resources and support facilities are given special considerations under LAFCO policies.<sup>15</sup> Specifically, 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.”<sup>16</sup>

## **II. RECOMMENDED POLICY REVIEW AND REVISION**

### **A. Initiate a Policy Review Process on Agricultural Preservation in Santa Barbara County.**

LAFCO is in the best position to examine policies to preserve Santa Barbara County’s agricultural resources. Encouraging agricultural preservation in Santa Barbara County is critical today as growth and development increase and a multi-year drought continues. More and more people are moving into North County as land values escalate and housing becomes more expensive, which has resulted in more complaints from residential areas about standard agricultural operations.<sup>17</sup> Farmers are reporting serious impediments to standard operations—not to mention expansion and intensification—and are increasingly concerned with the conversion of

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<sup>11</sup> California Government Code §56300.

<sup>12</sup> California Government Code §56668.

<sup>13</sup> California Government Code §56377 (b).

<sup>14</sup> *Policy Guidelines and Standards*, COMMISSIONER HANDBOOK.

<sup>15</sup> *Id.* at 10.

<sup>16</sup> *Id.*

<sup>17</sup> *Santa Barbara County Agricultural Resources Environmental/Economic Assessment (Area) Study*, AMERICAN FARMLAND TRUST, p. 50, [http://www.farmlandinfo.org/sites/default/files/SB\\_AREA\\_Study\\_Final\\_12\\_12\\_07\\_1.pdf](http://www.farmlandinfo.org/sites/default/files/SB_AREA_Study_Final_12_12_07_1.pdf).

agricultural lands in the County.<sup>18</sup> On a per-acre basis, much of the County's highest-value agricultural land is located in the Santa Maria Valley and Lompoc Valley, which are under intense development pressure. To sustain agriculture in the future, growth and development must be directed away from agricultural lands.

In 2007, Bob Braitman, LAFCO former executive officer, recommended that the members of the Commission conduct a study session to examine how LAFCO could be involved in protecting and enhancing the County's agricultural resources.<sup>19</sup> Mr. Braitman identified numerous issues for LAFCO to address in the study session including, for example, identifying the long term prospects for continued agricultural use, considering what factors affect agricultural production and value, and analyzing where farmland is most threatened by planned or prospective urban development. To the best of our knowledge, no such study session was ever conducted.

In carrying out this recommendation to enhance the County's agricultural viability, we urge LAFCO to conduct a comprehensive review of Santa Barbara County LAFCO policies to ensure it prevents urban sprawl and preserves agriculture.

**B. Proposed Clarifications and Amendments to Santa Barbara County LAFCO Policy, and Request to Promote Agricultural Viability.**

Certain LAFCO policies are ambiguous and should be clarified to ensure the preservation of agricultural lands. In addition, existing policies that would help reduce agricultural conversion should be proactively implemented.

**1. LAFCO Should Ensure Its Policies Addressing Annexations and Infill are More Protective of Agricultural Land.**

As an initial matter, LAFCO policies inconsistently refer to "prime" agricultural land, "agricultural land," and "nonprime" agricultural land. For example, SB County LAFCO Policy 5 refers generally to "agricultural lands" in providing that "[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, shall be discouraged." On the other hand, LAFCO Policy 4, section 2, provides that the "[d]evelopment of existing vacant non open space, and *nonprime agricultural land* within an agency's boundaries is encouraged prior to further annexation and development."<sup>20</sup> LAFCO should examine its policies to evaluate whether the distinctions between prime and non-prime agricultural lands throughout its policies remains relevant and, if so, whether the distinction threatens the preservation of agricultural lands. We are concerned that the definition for "prime

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<sup>18</sup> *Id.*

<sup>19</sup> Letter on "Possible 'Study Session' on Agricultural Preservation," SANTA BARBARA LOCAL AGENCY FORMATION COMMISSION, [http://www.sblafco.org/docs/03-01-07/Item13\\_Discussion\\_of\\_possible\\_study\\_session\\_on\\_agriculture.pdf](http://www.sblafco.org/docs/03-01-07/Item13_Discussion_of_possible_study_session_on_agriculture.pdf) (2007).

<sup>20</sup> *Policies Encouraging Orderly Urban Development and Preservation of Open Space*, SANTA BARBARA LOCAL AGENCY FORMATION COMMISSION, [http://www.sblafco.org/policy\\_04.sbc](http://www.sblafco.org/policy_04.sbc).

agricultural lands” under Government Code Section 56016 is too narrow, while “non-prime agricultural lands” is not defined in the Government Code or under SB County LAFCO policies and does not reflect advances in agricultural technology.

In addition to this overarching concern, we have specific concerns with the language in Policies 4 and 5, both of which contain sections that are ambiguous and vague regarding how agricultural land is to be protected. We have the following questions and redline edits with respect to each policy:

-- **Policy 4, Section 2:** Development of existing vacant non open space, and nonprime agricultural land within an agency’s boundaries is encouraged prior to further annexation and development. However, where open land adjacent to the agencies are of low agricultural, scenic, or biological value, annexation of those lands may be considered over development of prime agricultural land already existing within an agency’s jurisdiction.

**Questions/Concerns:** What constitutes “nonprime agricultural land” and why does this policy not simply protect all agricultural land? Who is to determine whether adjacent land is of low agricultural value? How can this policy ensure that prime agricultural land within an agency’s jurisdiction will not be developed when other options for development remain? If an agency is able to annex additional land in exchange for not developing its prime land, how is that condition enforced by LAFCO in order to ensure against sprawl and development of agricultural lands? We recommend that LAFCO revise this policy with these questions in mind in order to be more protective of agricultural land.

-- **Policy 4, Section 3:** Proposals to annex undeveloped or agricultural parcels to cities or districts providing urban services shall demonstrate that urban development is imminent for all or a substantial portion of the proposal area; that urban development will be contiguous with existing or proposed development; and that a planned, orderly, and efficient urban development pattern will result. Proposals resulting in a leapfrog, non-contiguous urban pattern **or development of agricultural lands** will be discouraged.

**Questions/Concerns:** We recommend the above red-line edit to this policy to ensure that leapfrogging in addition to development of agricultural lands is discouraged and to capture the questions/concerns previously discussed regarding Policy 4, Section 2.

-- **Policy 5, Section 2:** Annexation and development of existing vacant non-open space lands, and nonprime agricultural land within an agency’s sphere of influence is **encouraged required** to occur prior to development outside of an existing sphere of influence. **The applicant bears the burden of proving existing infill development is not feasible.**<sup>21</sup>

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<sup>21</sup> *Policies Encouraging Conservation of Prime Agricultural Lands and Open Space Areas*, SANTA BARBARA LOCAL AGENCY FORMATION COMMISSION, [http://www.sblafco.org/policy\\_05.sbc](http://www.sblafco.org/policy_05.sbc).

**Questions/Concerns:** Rather than simply *encouraging* infill development, LAFCO should *require* a city to infill prior to the annexation of agricultural lands where a certain percentage of infill land is available for development. LAFCO policy should also include language that the city has the burden of proving existing infill development opportunities are not feasible when seeking to expand. Our proposed red-line edits attempt to address this concern.

-- **Policy 5, Section 3:** A sphere of influence revision or update for an agency providing urban services where the revision includes prior agricultural land shall be discouraged. Development shall be guided towards areas not containing nonprime agricultural lands, unless such action will promote disorderly, inefficient development of the community or area.<sup>22</sup>

**Questions/Concerns:** The above red-line edit is intended to provide more protection of all agricultural land, and to not encourage development of nonprime agricultural land.

-- **Policy 5, Section 4:** Loss of agricultural lands should not be a primary issues [sic] for annexation where city and county general plans both indicate that urban development is appropriate and where there is consistency with the agency's sphere of influence. However, the loss of any primer [sic] agricultural soils-lands should be discouraged, in light of balaneed-against other LAFCO policies and a the LAFCO goal of conserving such lands.

**Questions/Concerns:** This policy is vague and provides inadequate guidance on the preservation of agricultural land. How can LAFCO ensure that agricultural land is protected by relying on a city and county general plan and sphere of influence? LAFCO is intended to serve as a check and balance on other agencies and plans for development, and should not dismiss the loss of agricultural lands with a deferential standard to other agencies. Moreover, the loss of agricultural lands should not just be "balanced" with other policies but should be prohibited or discouraged.

## **2. LAFCO Should Consider Tools for Reducing Impacts to Agricultural Viability, Including Agricultural Buffers, Especially in Light of Any Annexations.**

While we discourage the annexation of agricultural lands in Santa Barbara County, if an annexation of such lands occurs, we encourage LAFCO to take additional steps to reduce any impacts to agricultural viability and limit the scope of its decisions.

To limit the impact of annexation decisions on agricultural lands, LAFCO policies should strongly encourage agricultural buffers during the approval process for local government boundary changes. As Santa Barbara County recognized in adopting the Agricultural Buffer Ordinance, residential development adjacent to agricultural land often restricts farming

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<sup>22</sup> *Id.*

operations, which threatens their viability.<sup>23</sup> Complaints about standard farming operations like light, noise, dust, and odors occur when residential development is built too close to farmland; however, buffers can reduce this predictable land use conflict.

We recognize that LAFCO may not have the authority to condition an annexation decision on the inclusion of an agricultural buffer given that LAFCO does not have the authority to “impose any conditions that would directly regulate land use density or intensity, property development, or subdivision requirements.”<sup>24</sup> Nevertheless, LAFCO should work with Santa Barbara County to require binding agricultural buffers as a means of reducing predictable land use conflicts and impairment of agricultural lands, where possible. We therefore request that LAFCO consider the inclusion of buffer zones during the approval process for local government boundary changes.

### **C. LAFCO Should Reduce the Spheres of Influence of Cities Within Its Jurisdiction Where Possible.**

Finally, we recommend that LAFCO review existing Spheres of Influence (“SOIs”) and reduce them where possible in order to remove agricultural land from SOIs and further encourage their preservation. LAFCOs have the sole responsibility for establishing a city’s SOI.<sup>25</sup> As described under Section 56076 of the Government Code, the SOI is “a plan for the probable physical boundaries and service area of a local government agency as determined by the commission.”<sup>26</sup> In establishing, amending, or updating a SOI, a LAFCO must consider and make written determinations with regard to the following factors, including “[t]he present and planned uses in the area, including agricultural and open-space lands.”<sup>27</sup> The SOI is an important benchmark because it defines the primary area within which urban development is to be encouraged.<sup>28</sup> In a 1977 opinion, the California Attorney General stated that an agency’s SOI should “serve like general plans, serve as an essential planning tool to combat urban sprawl and provide well planned efficient urban development patterns, giving appropriate consideration to preserving prime agricultural and other open-space lands.”<sup>29</sup>

Under Santa Barbara County LAFCO policies, “[a]gricultural resources and support facilities should be given special consideration in sphere of influence designations.”<sup>30</sup> Policy 2 explicitly states that high value agriculture areas “should not be included in an urban service sphere of influence.”<sup>31</sup> Based on this policy, we urge Santa Barbara County LAFCO to conduct a

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<sup>23</sup> *Agricultural Element*, SANTA BARBARA COUNTY COMPREHENSIVE PLAN, p. 6, <http://longrange.sbcountyplanning.org/programs/genplanreformat/PDFdocs/Agricultural.pdf>.

<sup>24</sup> California Government Code §56375(6).

<sup>25</sup> *LAFCOs, General Plans, and City Annexations*, CALIFORNIA GOVERNOR’S OFFICE OF PLANNING AND RESEARCH, p. 13, [http://opr.ca.gov/docs/LAFCOs\\_GeneralPlans\\_City\\_Annexations.pdf](http://opr.ca.gov/docs/LAFCOs_GeneralPlans_City_Annexations.pdf).

<sup>26</sup> *Id.*

<sup>27</sup> California Government Code §56425(e).

<sup>28</sup> California Government Code §56425.

<sup>29</sup> 60 Ops. Cal. Atty. Gen. 118.

<sup>30</sup> *Sphere of Influence Policies*, SANTA BARBARA LOCAL AGENCY FORMATION COMMISSION, [http://www.sblafco.org/policy\\_02.sbc](http://www.sblafco.org/policy_02.sbc).

<sup>31</sup> *Id.*

comprehensive review of SOIs that encompass agricultural lands and make all necessary reductions as required under Policy 2. Lands lying within a SOI are those that the city may someday propose to annex, so LAFCO must be proactive in reviewing and removing agricultural areas from the SOIs when they are inconsistent with policies protective of agricultural lands. These reductions should be a component of the five-year review of SOIs, pursuant to LAFCO Policy 2.<sup>32</sup>

### III. CONCLUSION

In conclusion, we urge LAFCO to prioritize agricultural preservation in light of its statutory responsibility and authority, and to conduct a comprehensive policy review to ensure LAFCO has the most effective role that it can in preserving the County's agricultural resources. We also urge LAFCO to review and, where appropriate, reduce existing SOIs as a means to ensure long-term protection of threatened agricultural lands.

Thank you for your consideration of these comments and recommendations. Please contact us with any questions.

Sincerely,

Maggie Hall and Tara Messing, Environmental Defense Center

Santa Barbara County Farm Bureau

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

Paul Van Leer, Las Varas Ranch and Edwards Ranch

Jose Baer, Manager, Oso Ag LLC, Buellton; President, Rancho La Vina Corp, Lompoc

James Poett, Rancho San Julian

Ken Hough, Santa Barbara County Action Network

Carla Rosin, Co-Founder of Santa Barbara Food Alliance

Marell Brooks, Citizens Planning Association

Mark Oliver, Mark Oliver, Inc., Branding & Packaging Design

cc: Paul Hood, SB LAFCO Executive Officer

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<sup>32</sup> Policy 2 states that SOI "determinations are to be reviewed periodically and changed or updated as circumstances may require in the opinion of LAFCO ... approximately every five years." *Id.*



# PROPOSED CHANGES TO SANTA BARBARA COUNTY LAFCO OPEN SPACE AND AGRICULTURAL POLICIES

(Responding to LAFCO Letter Dated  
March 26, 2019)

(Submitted by Thomas E. Figg, Consulting Services, on  
Behalf of Potentially Affected Property Owners)

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(includes detailed Statement  
of Qualifications)

## Synopsis

The changes proposed in a letter from LAFCO dated March 26, 2019 (the “Policy Amendment”), elevates the importance of open space and agricultural policies contrary to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (“CKH”). Specifically: (i) the CKH gives priority to orderly growth and development along with the efficient delivery of governmental services; and (ii) provides that competing objectives of resource conservation be balanced in the broader interest of **“promoting the social, fiscal and economic well-being of the state** (CGS 56300 and 56301).”

## Considerations

In balancing competing State interests under CKH, the Legislature has expressed a clear preference for: ...“**accommodating additional growth** within, or through the expansion of, the boundaries...which can best **accommodate and provide necessary governmental services and housing for persons and families of all incomes in the most efficient manner feasible.**” (GCS 56001). This legislative mandate serves as the fulcrum for harmonizing potential policy conflicts.

An overarching goal expressed in the County of Santa Barbara Comprehensive Plan is to: ...“**assure and enhance the continuation of agriculture as a major viable production industry.**” (Agricultural Element, Goal I). This goal is indisputable. However, the proposed Policy Amendment would impose punitive measures upon **ALL** LAFCO proposals involving the removal of prime soils without regard to project-specific impacts or resulting impairment of statutory goals. This approach is contrary to the principles of environmental, social and economic justice upon which CHK is based.

# Proposal

Based on the above considerations, alternative language is recommended to reconcile the competing interest of open space/agricultural preservation and the broader statutory goal of facilitating ... ***“planned, well-ordered, efficient urban development patterns.”*** In place of the policy revisions that have been introduced, the following changes are recommended. Words underscored in red represent new language for insertion into the existing LAFCO policy guidelines, while passages stricken in red denotes proposed policy language to be deleted.

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## ~~PRESERVING OPEN SPACE AND AGRICULTURAL RESOURCES~~

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~~LAFCO must consider the effect that any proposal may produce on existing open space and agricultural lands, especially prime farm lands. The Cortese-Knox-Hertzberg Act (CKH) strongly discourages the use of prime agriculture land for development. The definition of prime agriculture land is found in the CKH Act and is broadly defined in the Act. By guiding development toward vacant urban land and away from agricultural land, LAFCO assists with the preservation of valuable agricultural resources. The policies in Sections IV. and V are designed to assist LAFCO in making decisions concerning the Encouragement of Orderly Urban Development and reservation of Open Space Patterns and Encouraging the Conservation of Prime Agricultural Lands and Open Space. A policy is a statement that guides decision making by indicating a clear direction on the part of LAFCO. The following two policies support the goals stated above and shall be used by Santa Barbara LAFCO when considering a proposal that would involve agricultural resources:~~

~~The protection of open space and agricultural resources is of particular importance in Santa Barbara County. The policies appearing in Sections IV and V are expressly designed to assist LAFCO in making decisions which both acknowledge the value of these resources while balancing the state interests as expressed in Government Code Section 56001. Under the Cortese-Knox-Hertzberg Act, all policies must be applied in a manner that collectively result in ...***“planned, well-ordered, efficient urban development patterns.”***~~

~~LAFCO assists with the preservation of valuable agricultural resources. The policies in Sections IV. and V are designed to assist LAFCO in making decisions concerning the Encouragement of Orderly Urban Development and reservation of Open Space Patterns and Encouraging the Conservation of Prime Agricultural Lands and Open Space. A policy is a statement that guides decision making by indicating a clear direction on the part of LAFCO. The following two policies support the goals stated above and shall be used by Santa Barbara LAFCO when considering a proposal that would involve agricultural resources:~~

IV. POLICIES ENCOURAGING ORDERLY URBAN DEVELOPMENT AND PRESERVATION OF OPEN SPACE PATTERNS

V. POLICIES ENCOURAGING CONSERVATION OF PRIME AGRICULTURAL LANDS AND OPEN SPACE AREAS

4. Loss of agricultural lands should not be a primary issue for annexation where: (i) city and county general plans both indicate that urban development is appropriate and where there is consistency with the agency's sphere of influence. However, the loss of any primer agricultural soils should be balanced against other LAFCO policies and a LAFCO goal of conserving such lands the reduction in property available for cultivation would not undermine agriculture as a viable production industry in Santa Barbara County; (ii) the adjustment in boundaries provides for a logical and orderly accommodation of urban growth; or (iii) the environmental and public benefits of the proposal (e.g., protective buffers, jobs-housing balance, etc.) affirmatively further other statutory objectives under the Cortese-Knox-Hertzberg Act.
5. Where the loss of property available for cultivation is found by LAFCO to undermine agriculture as a viable production industry in Santa Barbara County, and such property contains prime agricultural land as defined in California Government Code Section 56064, the proposal may be denied by LAFCO unless there are overriding considerations including, but not limited to: (i) offsetting statutory policies (e.g., housing production); (ii) purchase of off-site conservation easements; (iii) payment of in-lieu fees to support preservation elsewhere within the County; and (iv) other equivalent measures mutually agreeable to LAFCO and the applicant.

~~5. A Memorandum of Agreement between a city and the County should be used and amended as needed to address the impacts on and conversion of Agricultural Lands on the fringe of a city.~~

~~6. The Commission may approve annexations of prime agricultural land only if mitigation that equates to a substitution ratio of at least 1:1 for the prime land to be converted from agricultural use is agreed to by the applicant (landowner), the jurisdiction with land use authority. The 1:1 substitution ratio may be met by implementing various measures:~~

~~a. Acquisition and dedication of farmland, development rights, and/or agricultural conservation easements to permanently protect farmlands within the annexation area or lands with similar characteristics within the County Planning Area.~~

~~b. Payment of in lieu fees to an established, qualified, mitigation/conservation program or organization sufficient to fully fund the acquisition and dedication activities stated above in 6a.~~

~~c. Other measures agreed to by the applicant and the land use jurisdiction that meet the intent of replacing prime agricultural land at a 1:1 ratio.~~



May 15, 2019

To: [lafco@sblafco.org](mailto:lafco@sblafco.org), [jralexander@countyofsb.org](mailto:jralexander@countyofsb.org)

Re: Request for Comments on LAFCO Agricultural and Open Space Policies

Dear Mr. Hood, LAFCO Ad Hoc Committee, and LAFCO Members:

Thank you for the opportunity to review and comment on these important policies. The Association represents over 170 growers, shippers, farm labor contractors, and supporting agribusinesses that are interdependent with a vibrant agricultural economy. Our members grow diverse field and nursery crops such as broccoli, strawberries, and wine grapes throughout Santa Barbara County. Many of our members are located in the Santa Maria and Lompoc Valleys, which have been and will continue to be a focus of agricultural-urban interface issues. LAFCO's role in evaluating potential changes to jurisdictional boundaries is essential in proactively anticipating and preventing the negative effects of predictable land use conflicts and conserving agriculture. On behalf of our members the Association is very concerned with the impacts to agriculture through direct land use conversion as well as the impacts from expanding land use conflicts to areas that were formerly surrounded by and compatible with agriculture. We appreciate that policy revisions are being contemplated but the proposed language provided in Exhibit A falls short of what is needed in updating LAFCO's Agricultural and Open Space Policies. We suggest the following revisions:

**1. Restate Support for Environmental Defense Center (EDC) Letter dated March 16, 2018—  
Specific Wording Revisions to Policies IV and V**

We restate our support for the points articulated in the EDC letter dated March 16, 2018; these include the difficulties of defining and limiting protections to “prime” agricultural land versus “agricultural lands” (EDC letter page 5), along with the specific wording changes on pages 6 and 7. We would like to see more of the specific redline wording changes incorporated in the LAFCO revisions to its policies on agricultural conservation.

**2. Disagreement with Draft Language in Exhibit A Policy V.5 (Memorandum of Agreement)**

We are concerned that “A Memorandum of Agreement between a city and the County...” that can be “amended as needed” is overly ambiguous and facilitates the development of agricultural lands. Furthermore, we are concerned that the proposed Memorandum of Agreement would circumvent LAFCO's role and undermine the intended goal of agricultural land conservation. Unfortunately, we have experienced situations where agreed-upon terms mitigating impacts to agricultural lands were reneged once the lands were within a City's jurisdictional boundaries. We believe that a transparent, permanently binding agreement that can be reviewed by stakeholders, including agricultural and other interested

parties, should factor into LAFCO's contemplation and be a binding condition of approval of changes to jurisdictional boundaries.

### **3. Disagreement with Draft Language in Exhibit A Policy V.6 (Mitigation of Annexations)**

This proposed policy revision does not address the fundamental LAFCO policies of encouraging conservation and protection of agricultural lands. The proposed policy does not encourage protection but instead encourages a pathway for facilitating the development of agricultural lands; the proposed mitigation measures undermine the conservation of agricultural lands instead of offering meaningful protections.

### **4. Fundamental Differences Between "Prime Agricultural Land", "Nonprime Agricultural Land", and "Agricultural Land"**

As stated in the EDC letter on pages 5 and 6, LAFCO policies use the terms prime agricultural land, nonprime agricultural land, and agricultural land interchangeably. We believe that references to "agricultural land" is most appropriate.

### **5. Look to model policies such as Santa Barbara County Agricultural Buffer Ordinance and Right to Farm Policies as permanently binding conditions prior to approval of changes to jurisdictional boundaries**

As referenced previously, we are very concerned that conditions intended to minimize negative impacts to agricultural resources have not always been honored after annexation. To prevent this from happening in the future and preserve the integrity of LAFCO, we encourage greater attention and implementation of policies that permanently memorialize such agreements in a binding manner that cannot be discarded. Otherwise, agricultural resources will be burdened to absorb the changes in land usability resulting from the annexation and development of neighboring properties.

We appreciate the opportunity to balance multiple needs as potential changes to jurisdictional boundaries are considered by LAFCO. Developing and implementing strong policies encouraging conservation of agricultural lands are essential to orderly land use patterns, preventing predictable land use conflicts, and maintaining a vibrant community and economy in Santa Barbara County. Thank you for incorporating these comments as the policy updates move forward.

Sincerely,



Claire Wineman  
President



May 15, 2019

Paul Hood  
Executive Officer  
SB Local Agency Formation Commission  
105 East Anapamu Street  
Santa Barbara CA 93101

**RE: Request for Comments –LAFCO Agricultural and Open Space Policies**

Dear Mr. Hood:

My company Lompoc Valley Hotels. LLC DBA Surestay by Best Western operates a Hotel business in Lompoc. Due to that, I am very concerned about the currently proposed revisions to LAFCO Agricultural and Open Space policies, which I understand were made available for comment on or about March 26, 2019. That concern is significant and in recognition of the of the City's long history of supporting the local agricultural industry.

The community of Lompoc relies heavily on its commercial and residential developments to ensure the quality of life for our Lompoc Valley residents and visitors. The City, as well as most of California, are in critical need of new housing. The City does not have vacant land suitable for such developments, nor is potential in-fill any where near sufficient to meet that need.

Based on that, our community is very concerned about the currently proposed policies. Those policies will, for all intents and purposes, not allow the City to expand to meet those needs as was the original intent of the Cortese-Knox-Hertzberg Act. Expansion is essential for the City to be able to fund its general governmental operations and protect the public health and safety of the community, and to meet the social and housing needs of the City. Those proposed policies will also prevent the City from maintaining its services and flourishing in the future.

Thank you for the opportunity to comment. We appreciate your attention to this important matter and expect your positive considerations to quell our concerns. If you would like to discuss these comments, then please contact me at (805) 588-4709 or by email at Paulp1621@gmail.com

Sincerely,

Paul Patel  
president

c: Honorable Chair and Commission Members  
Mayor and City Council  
Jim Throop, City Manager

[bestwestern.com](http://bestwestern.com)

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**EXHIBIT E**

May 15, 2019

Paul Hood  
Executive Officer  
SB Local Agency Formation Commission  
105 East Anapamu Street  
Santa Barbara CA 93101

**RE: Request for Comments –LAFCO Agricultural and Open Space Policies**

Dear Mr. Hood:

My company K & A Hotels. LLC DBA Inn of Lompoc operates a Hotel business in Lompoc. Due to that, I am very concerned about the currently proposed revisions to LAFCO Agricultural and Open Space policies, which I understand were made available for comment on or about March 26, 2019. That concern is significant and in recognition of the of the City's long history of supporting the local agricultural industry.

The community of Lompoc relies heavily on its commercial and residential developments to ensure the quality of life for our Lompoc Valley residents and visitors. The City, as well as most of California, are in critical need of new housing. The City does not have vacant land suitable for such developments, nor is potential in-fill any where near sufficient to meet that need.

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Thank you for the opportunity to comment. We appreciate your attention to this important matter and expect your positive considerations to quell our concerns. If you would like to discuss these comments, then please contact me at (805) 588-4709 or by email at Paulp1621@gmail.com

Sincerely,

Paul Patel  
president  
K & A Hotels

c: Honorable Chair and Commission Members  
Mayor and City Council  
Jim Throop, City Manager

**EXHIBIT E**

May 15, 2019

Paul Hood  
Executive Officer  
SB Local Agency Formation Commission  
105 East Anapamu Street  
Santa Barbara CA 93101

**RE: Request for Comments –LAFCO Agricultural and Open Space Policies**

Dear Mr. Hood:

My company TMP Hospitality ,LLC DBA Lompoc Motel operates a Hotel business in Lompoc. Due to that, I am very concerned about the currently proposed revisions to LAFCO Agricultural and Open Space policies, which I understand were made available for comment on or about March 26, 2019. That concern is significant and in recognition of the of the City's long history of supporting the local agricultural industry.

The community of Lompoc relies heavily on its commercial and residential developments to ensure the quality of life for our Lompoc Valley residents and visitors. The City, as well as most of California, are in critical need of hew housing. The City does not have vacant land suitable for such developments, nor is potential in-fill any where near sufficient to meet that need.

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Thank you for the opportunity to comment. We appreciate your attention to this important matter and expect your positive considerations to quell our concerns. If you would like to discuss these comments, then please contact me at (805) 588-4709 or by email at Paulp1621@gmail.com

Sincerely,

Paul Patel  
president  
TMP Hospitality

c: Honorable Chair and Commission Members  
Mayor and City Council  
Jim Throop, City Manager

**EXHIBIT E**





May 14, 2019

Paul Hood  
Executive Officer  
SB Local Agency Formation Commission  
105 East Anapamu Street  
Santa Barbara CA 93101

RE: Request for Comments –LAFCO Agricultural and Open Space Policies

Dear Mr. Hood:

I represent Lompoc Land Holdings, LLC, DBA Hilton Garden Inn Lompoc. Due to that, I am very concerned about the currently proposed revisions to LAFCO Agricultural and Open Space policies, which I understand were made available for comment on or about March 26, 2019. That concern is significant and in recognition of the of the City's long history of supporting the local agricultural industry.

The community of Lompoc relies heavily on its commercial and residential developments to ensure the quality of life for our Lompoc Valley residents and visitors. The City, as well as most of California, are in critical need of new housing. The City does not have vacant land suitable for such developments, nor is potential in-fill any where near sufficient to meet that need.

Based on that, our community is very concerned about the currently proposed policies. Those policies will, for all intents and purposes, not allow the City to expand to meet those needs as was the original intent of the Cortese-Knox-Hertzberg Act. Expansion is essential for the City to be able to fund its general governmental operations and protect the public health and safety of the community, and to meet the social and housing needs of the City. Those proposed policies will also prevent the City from maintaining its services and flourishing in the future.

Thank you for the opportunity to comment. I appreciate your attention to this important matter and expect your positive considerations to quell our concerns. If you would like to discuss these comments, then please contact me at (805) 680-4627 or by email at [atulp67@gmail.com](mailto:atulp67@gmail.com)

Sincerely,

A handwritten signature in blue ink, appearing to read "Atul Patel", written over a light blue horizontal line.

Atul Patel | Principal Correspondent  
Lompoc Land Holdings, LLC

c: Honorable Chair and Commission Members  
Mayor and City Council  
Jim Throop, City Manager



May 14, 2019

Paul Hood  
Executive Officer  
SB Local Agency Formation Commission  
105 East Anapamu Street  
Santa Barbara CA 93101

RE: Request for Comments –LAFCO Agricultural and Open Space Policies

Dear Mr. Hood:

I represent United Lions Corporation, DBA Holiday Inn Express Lompoc. Due to that, I am very concerned about the currently proposed revisions to LAFCO Agricultural and Open Space policies, which I understand were made available for comment on or about March 26, 2019. That concern is significant and in recognition of the of the City's long history of supporting the local agricultural industry.

The community of Lompoc relies heavily on its commercial and residential developments to ensure the quality of life for our Lompoc Valley residents and visitors. The City, as well as most of California, are in critical need of new housing. The City does not have vacant land suitable for such developments, nor is potential in-fill any where near sufficient to meet that need.

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Sincerely,

A handwritten signature in blue ink, appearing to read 'Atul Patel', written over a horizontal line.

Atul Patel | Principal Correspondent  
United Lions Corporation

c: Honorable Chair and Commission Members  
Mayor and City Council  
Jim Throop, City Manager



3 May 2019

Paul Hood  
Executive Officer  
Santa Barbara Local Agency Formation Commission  
105 East Anapamu Street  
Santa Barbara, CA 93101

Paul:

My purpose in writing today is to provide comments regarding the proposed policy revisions that were recently proposed by the Agricultural and Open Space Policies Ad Hoc Committee.

We believe that the proposed modifications to the LAFCO's existing policies will have significant, and negative, impacts on the ability of cities in our county – and Santa Maria in particular – to plan for well planned, orderly, and necessary growth and urge the Commission to reject the proposed language.

The intent of the California legislature was clear in establishing LAFCOs through the Cortese-Knox-Herzberg Act. The act authorizes and directs LAFCOs to implement policies which "...encourages and provides planned, well-ordered, efficient urban development patterns with appropriate consideration of preserving open-space and agricultural lands within those patterns." Inherent in that charge is the understanding that growth will occur and that it should be planned for and encouraged.

SBLAFCO policies and CEQA requirements already require that impacts on agricultural and open space be considered as one of the necessarily competing factors to be considered in planning for growth. The modifications that have been proposed by an organization with a specific philosophical objective are unnecessary and appear to be designed to force LAFCO to change its fundamental mission to one that discourages and prevents urban development in any form. We strongly oppose this intent and approach.

Santa Maria, and our sister cities, strive for balanced, logical and reasonable development. As communities in the southern part of the county reach build-out status, the ability for those in the northern part of the county to be able to plan for growth that enhances quality of life, ensures an adequate supply of housing is available for our residents at all income levels, and accommodates the jobs that sustain individuals and communities. In doing so, the cities need to maintain as much local control as possible to deliver "planned, well-ordered, efficient urban development."

Sincerely,



Glenn D. Morris  
President & CEO

# COLAB

The Coalition of Labor, Agriculture & Business

May 29, 2019

LAFCO

Santa Barbara County

Delivered via email at: [lafco@sblafco.org](mailto:lafco@sblafco.org)

Dear Chairman Lavagnino and Fellow Commissioners,

I am writing on behalf of COLAB, the Coalition of Labor, Agriculture and Business of Santa Barbara County, as it pertains to the proposed Ag and Open Space Policy under consideration at your June 6, 2019 meeting.

Whereas, COLAB supports the protection of prime ag land from urban sprawl and encroachment, the ability of our community to protect the same cannot be made in a vacuum of two things. First, the RHNA mandate that requires all communities to accommodate their fair share of future housing growth. Second, the fact that fewer and fewer people in our society want to farm, and can afford to farm, given a plethora of circumstances that are not conducive to the same.

With respect to allowing communities to grow, we favor heading to the hills! The county of Santa Barbara has some strict rules and regulations that prohibit farming on our hillsides making the same ideal for housing. This would alleviate the pressure of continuing to build on our valley floors where most of our prime ag land exists. Most of this hilly terrain is currently used for cattle ranching. We believe there is enough land to accommodate both our cattle and future residents.

Having said that, we believe one of the most important things your commission can do is lobby for a change in state law as it pertains to future development. That is, the rule that requires future development to be contiguous to existing development is THE recipe for disaster as it pertains to realizing our mutual goal of preserving prime ag land to the best of our abilities. That is, since most all original communities were created smack dab in the middle of historic farm grounds, this policy has virtually assured all future development would continue to absorb adjacent farmlands. The only solution to this dilemma is to leapfrog over the adjacent farmlands! This can be accomplished in one of two ways. Existing communities either incorporate larger swaths of land while keeping the nearest prime farmlands zoned for agriculture, while developing the hill country beyond the same. Or, we start new communities from scratch in the hill country!

With respect to forcing land to stay in agriculture, foregoing the opportunity to be annexed to a city, well, that is one sticky wicket! There are some families who own these properties who are already out of farming. They are leasing their land but would rather develop the same. Farmers are facing labor shortages, severe water challenges, pesticide and herbicide restrictions, the \$15 minimum wage and overtime pay requirements, along with foreign competition and market impediments, to name just a few of the challenges. Considering these challenges, we don't believe it is ethical to tell these families they can never develop in their lifetime!

COLAB PO Box 7523, Santa Maria, CA 93456 Ph. (805) 929-3148 Email: [Andy@colabsbc.org](mailto:Andy@colabsbc.org)

**EXHIBIT E**

# COLAB

The Coalition of Labor, Agriculture & Business

Neither does it make sense in the Santa Maria Valley, as it pertains to the land along the east side of the 101 freeway, that we should forego the opportunity to develop the land there in order to utilize the freeway as a north/south arterial. The alternative under consideration will not allow us to avoid horrible traffic congestion that will otherwise arise as a result of continuing to rely on high density development on the west side of the freeway to meet future needs.

In addition to believing you shouldn't try to force people to stay in ag, we also believe you don't have the rights or means, short of condemnation, to force people out of ag. For instance, consider the Enos Ranch in Santa Maria. They stayed in agriculture for a very long time after they had the right to convert to urban development.

How would your proposed policy of forcing high density infill development work in that case and the case of other properties that are still being farmed? Would the city of Santa Maria be required to obtain letters from every landowner of undeveloped property in the city indicating they are not willing or ready to have their land developed at this time in order to justify growing the urban boundary? Such a policy consideration would be untenable as it presents an impractical moving target.

COLAB does not believe LAFCO should aspire to be the governing body that sets policies for every jurisdiction in this county. We believe you have the right and duty to review, but not dictate, what you are willing to review. We suggest you encourage the South County cities and the County of Santa Barbara, along with the City of SLO, to facilitate more development in order to alleviate the jobs/housing imbalance that is putting undue pressures on Santa Maria, Lompoc and Ventura County.

Finally, we can't help but point out the hypocrisy of the Environmental Defense Center in proposing these major policy changes without supporting the requirement of an EIR to assess the related impacts of the same! LAFCO should certainly not adopt this policy unless and until the impacts to cities and surrounding landowners are fully disclosed by way of an EIR. That is the only legally defensible action LAFCO can make.

Thank you for your consideration of these comments.

Sincerely,

Andy Caldwell  
Executive Director  
COLAB



# SANTA BARBARA COUNTY CATTLEMEN'S ASSOCIATION



P.O. Box 303, Los Alamos, CA 93440

**"WORKING TO SAVE RANCHING"**

June 6, 2019

Mr. Paul Hood, Executive Officer  
Santa Barbara County LAFCO  
105 East Anapamu Street  
Santa Barbara, CA 93101

Re: Policy modifications proposed by the Agricultural and Open Space Policies Ad Hoc Committee.

Dear Mr. Hood:

The Santa Barbara County Cattlemen's Association appreciates the opportunity to offer our input on the policy changes you will consider at your June 6<sup>th</sup> meeting.

As our mission is ***working to save ranching***, we are generally opposed to conversion of agricultural lands and leapfrog development that can introduce incompatible uses into agricultural areas which can eventually lead to policies that impose new restrictions on our practices in order to protect those incompatible uses. However, given the policies already in place to give primary consideration to protecting prime agricultural lands and open space, we question whether the proposed modifications are necessary. Often, new policies are proposed to fix a problem caused by failure to adhere to or enforce existing policies. We suspect that this is the case here. We have been stung by the unintended consequences of "policy creep" in the past and are sensitive to new policies which could head down this path. Proposed new policies 5 & 6 contained in Section V of the LAFCO policies have open ended provisions which give us particular concern.

It should be understood that overwhelmingly among us, our wealth, such as we have it, is in the value of our land, not the income it produces. Consequently, any policy that could negatively impact these values is potentially of serious concern to us.

We are also somewhat curious regarding the creation of the Ad hoc Committee. The Santa Barbara County Cattlemen's Association represents the ranchers who own the majority of the Ag II lands in the county. However, we are unaware of any outreach to our organization.

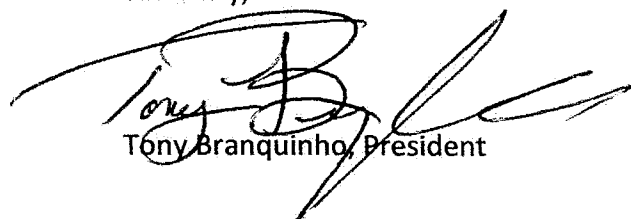
Finally, our Association, and our parent organization, California Cattlemen's Association, have always advocated for local control. The proposed new policies hamstring, in particular, cities

**EXHIBIT E**

like Santa Maria and Lompoc which must plan for orderly development in their regions.

In conclusion, while we support the basic intent of the new policies to protect prime farmland, we believe that the existing policies, if followed, are sufficient to meet this objective and the new proposed policies are unnecessary.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tony Branquinho', with a large, stylized initial 'B' and a long, sweeping horizontal stroke extending to the right.

Tony Branquinho, President