

LAFCO

Santa Barbara Local Agency Formation Commission
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March 4, 2021 (Agenda)

Local Agency Formation Commission
105 East Anapamu Street
Santa Barbara CA 93101

**Study Session regarding Bailey SOI Amendment and Annexation to the
City of Lompoc - Addendum Memo**

Dear Members of the Commission

RECOMMENDATION

It is recommended that the Commission direct the staff to either hold the Study Session or schedule this matter for a future meeting.

DISCUSSION

At the request of the County Planning and Development Department, the Commission could continue the item on this agenda.

On February 24 we received the enclosed memorandum from Planning and Development raising their interest and scheduling conflict that should be addressed before this matter can be heard.

Accordingly, we recommend staff be directed to either continue with this Study Session or either schedule this proposal for a future meeting to allow the opportunity for County representation to participate.

Please contact the LAFCO office if you have any questions.

Sincerely,



Mike Prater
Executive Officer

Subject: FW: Letter re Annexation

From: Klemann, Daniel

Sent: Wednesday, February 24, 2021 11:20 AM

To: Email Lafco <lafco@sblafco.org>

Cc: Plowman, Lisa <plowman@co.santa-barbara.ca.us>; Carlson, Zoe <carlsonz@co.santa-barbara.ca.us>; Bell, Allen <abell@co.santa-barbara.ca.us>

Subject: RE: Letter re Annexation

Good Morning, Mike:

I hope all is going well for you.

Are you still planning on adding the Bailey Avenue Annexation "Study Session" to the LAFCO agenda for the March 4th hearing?

If so, since the last time we communicated about this, something came up and we will not be available to participate in the Study Session on March 4th.

Are there alternative dates that will work for you?

Please let me know.

Thanks!



Dan Klemann

Deputy Director

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March 4, 2021 (Agenda)

Local Agency Formation Commission
105 East Anapamu Street
Santa Barbara CA 93101

Study Session regarding Bailey SOI Amendment and Annexation to the City of Lompoc

Dear Members of the Commission

RECOMMENDATION

It is recommended that the Commission receive and file this report. As part of the hearing on this report, Commissions may identify questions and additional information requests for future consideration, but should not indicate if they support or oppose the project.

DISCUSSION

This study session is to provide the Commission with information regarding the Bailey Avenue proposal submitted by the City of Lompoc. Attachments A is a summary of the proposal and a description of the project. Attachment B is a summary of the applicable LAFCO Policies. Attachment C contains comment letters from County P&D regarding the proposal. Much of this report summaries the Environmnetal impact Report and subsequent Addendum. The intent of the Study Session is to allow for the Commission to identify additional issues and questions that must be addressed that would help the Commission to better understand the project. Commissioners are specifically advised to not take a position on this project at this time because additional evidence and analysis will be added to the administrative record before this project is ready for a Commission decision on the ultimate merits.

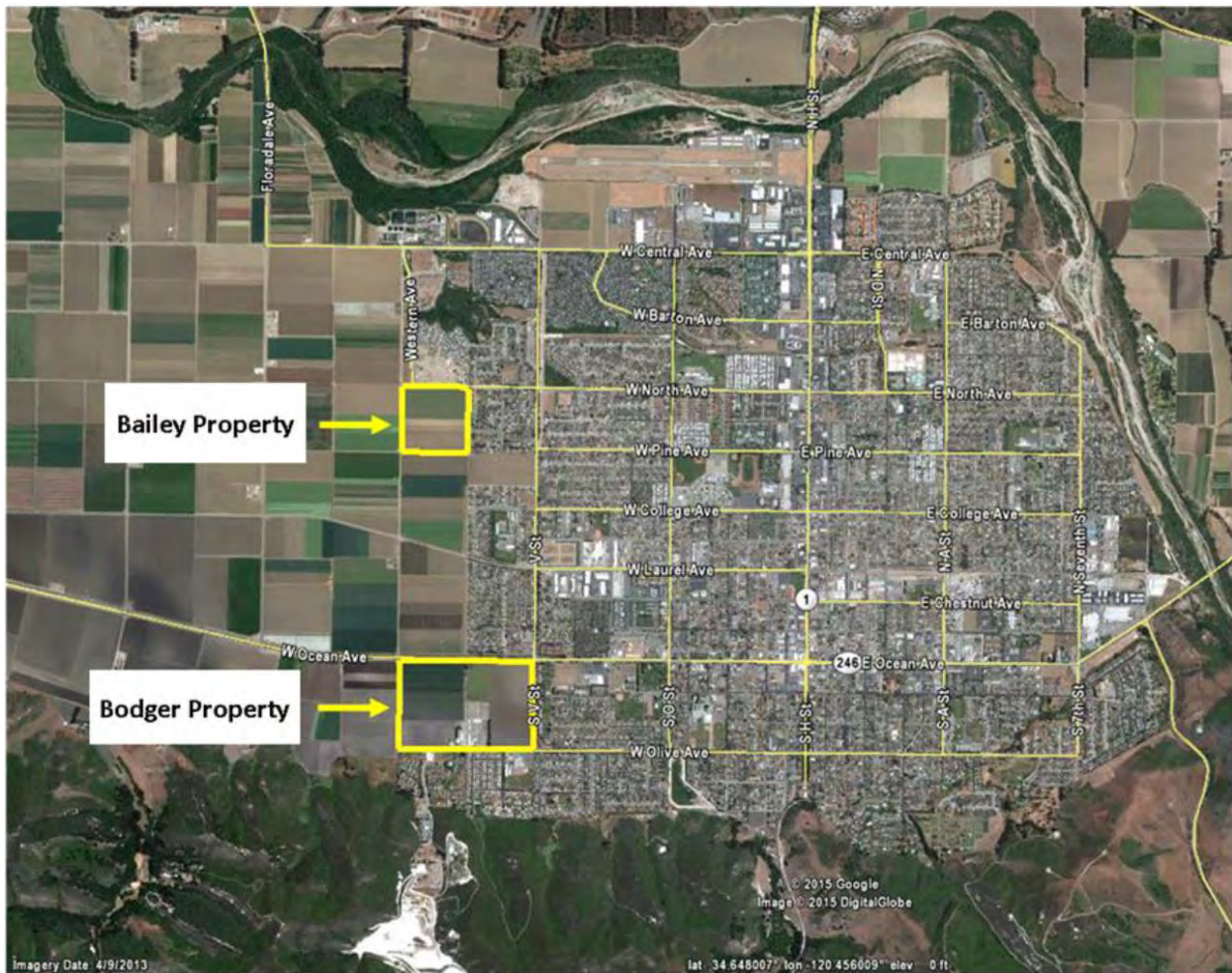
This proposal would consider the Sphere of Influence Amendment and Annexation of the Bailey project area. The project area consists of two non-contiguous properties located within the northerly and southerly portions of the Bailey Avenue Corridor. The

property is located within the unincorporated area of Santa Barbara, adjacent to the northwest and southwest edge of Lompoc City limits. The two properties are held under separate ownership, but are being processed together.

The Bailey Property (Annexation Area A) is a 40.6-acre property, owned by LB & L-DS Ventures Lompoc II LLC. The area is currently used for agriculture.

The Bodger Property (Annexation Area B) is a 107.7-acre property, owned by John Bodger & Sons Co., a corporation. The south-central portion of the property is currently developed with the Bodger seed complex, which consists of agricultural support buildings including maintenance facilities, storage sheds, greenhouses and farmhouse/residence. The City's Urban Limit Line (ULL) along Bailey Avenue would remain unchanged. A vicinity map is provided below.

Vicinity Map



The City certified the Final Environmental Impact Report (FEIR) on October 19, 2010 for Phase 1 City of Lompoc 2030 General Plan (includes update to Land Use, Housing and Circulation Elements). On July 18, 2017 the City adopted an Addendum No. 3 to initiating annexation proceedings (this addendum analyzed changes or additions that have occurred since the FEIR which include: Hazards and Hazardous Material, Noise, Transportation and Circulation impacts as a result of the annexation request). All other impacts and analysis were determined by the City to be covered by the original FEIR. The City prepared a Notice of Preparation and requested a Program EIR scoping meeting on August 26, 2008. LAFCO did not provide comments during the NOP or draft EIR stage, however comments from other agencies and the public were raised.

The City initiated the Bailey Avenue Specific Plan under separate environmental review. A NOP was issued on October 29, 2008 shortly after the Program EIR was under-way. However, the City did not certify an EIR for the Bailey Avenue Specific Plan. The City has stopped processing of this specific plan. Rather the City requested annexation of the the two subject annexation areas as shown in the figure on the next page based upon the City General Plan designations which maintained the Bailey Avenue Corridor within the Urban Limit Line containing Low and Very-Low Density Residential designations.

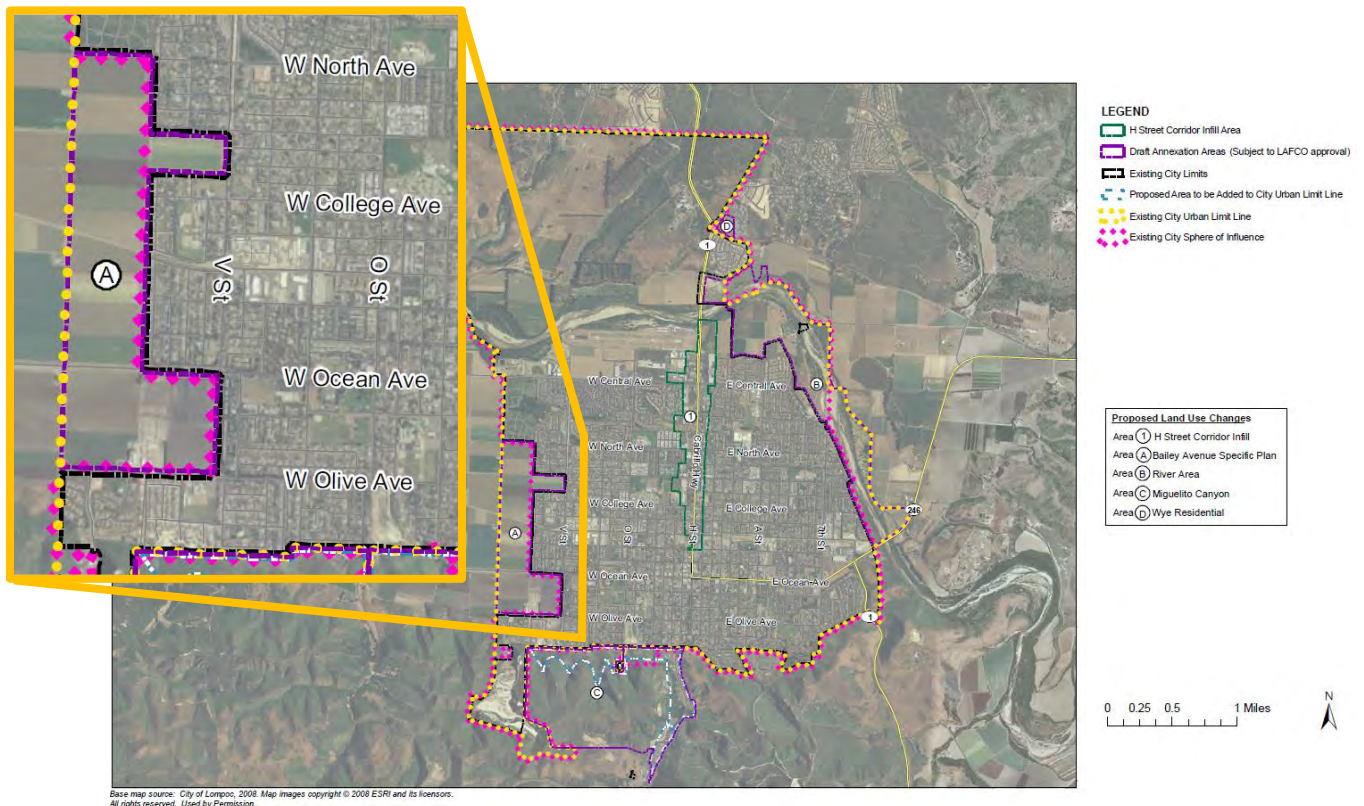
This application includes a proposal to amend the Sphere of Influence and complete the Annexation concurrently. The two subject properties would also be detached from the County Service Area 32, the Santa Barbara County Fire Protection District, and the Mosquito and Vector Management District of Santa Barbara County. The Final Environmental Impact Report and Addendum addresses a variety of issues: traffic and circulation system impacts, water supply issues, agricultural issues, as well as other topics that will be included in today's discussion.

BACKGROUND

The plan area for the 2030 General Plan encompasses all areas within and outside the City's boundaries that bear a relation to the City's planning responsibility. This includes the City's Sphere of Influence (SOI) and Urban Limit Line. In addition to the areas within the Lompoc incorporated boundaries, the General Plan update addresses unincorporated areas surrounding the City that may be considered for future annexation. This General Plan update did include the Bailey Avenue Specific Plan area. The City prepared an Addendum No. 3 to address changes or additions that have occurred since the FEIR. The figure on the next page shows the Bailey Avenue Corridor.

The topography in the Lompoc area is varied. Flat or level topography constitutes the majority of the area within the existing City Limits, while the southern hillsides, the Santa Rita Hills, and the Purisima Hills provide distinctive, steeper topography surrounding the City. The Lompoc Valley contains over 45,000 acres of agricultural land. The physical conditions within the Lompoc Valley make it one of the most versatile crop-growing regions in the state, renowned for its flower seed industry. The central portion of the Lompoc Valley is predominantly flat agricultural land approximately 100 feet above mean sea level.

Bailey Avenue FEIR Area of Study



PROJECT DESCRIPTION

The Bailey Avenue corridor consist of agricultural fields in the foreground and existing urban residential development in the middle ground. Additional detail from a Specific Plan could be analyzed in a future Specific Plan EIR for the expansion area. However, the LAFCO questionnaire (**Attachment A**) requests a purpose of the proposal and the following was stated:

“These land use designations would allow for the development of 87 residential units on the Bailey property, 382 residential units on the Bodger property, and 364 residential units on the balance of

the Bailey Avenue Corridor. No development is proposed with the current request. Following an affirmative action on the Annexation request, any proposed development would be processed through the City Development Review process with appropriate environmental review."

The City may still need to pre-zone the site and adopt a Plan for Services that address the level of services expected. The City's application questionnaire states the the Bailey Property (Area A) currently has a Santa Barbara County Zoning Designation of AG-II-100 and the Bodger Property (Area B) currently has a Designation of Ag-II-40. The City Zoning designation that would be consistent with the 2030 General Plan Land Use Designation of Very Low Density and Low Density Residential would be Residential Agricultural (RA). Once pre-zoned the City would be required to maintain that zoning for a period of two years before any changes could occur.

The City's Zoning Ordinance under Residential Agricultural designation, uses would be restricted to a combination of agriculture and large lot residential (at a density of 2.2 dwellings per acre). This designation would allow a maximum of 301 dwellings. At the time, the FEIR anticipated that development in the Bailey Avenue Specific Plan area could include 2,184 single family residential units, 534 multiple-family residential units, and 228,700 square feet of commercial space.

The City had a Fiscal Analysis prepared by Stanley Hoffman Associates, Inc. in 2017 for the propped annexation. The general description is similar to their application questionnaire above.

Development of the Bailey Avenue annexation area could add an estimated 1,350 residents (469 dwelling units x 2.88 people/dwelling unit), thus increasing the City's population to 44,307. This estimate is within SBCAG's 2030 growth forecast for the City (48,200 in 2030) by 3,893 less people or by approximately 8%.

KEY ISSUES FOR LAFCO

Agriculture: The project site is currently developed with intensified agricultural uses. The site (148 acres) would be lost to conversion for non-agricultural use such as residential, commercial, and other uses.

The FEIR concludes approximately all 271 acres of the Bailey Avenue Specific Plan site meets the LAFCO definition of prime agricultural land (259-acres) and/or California Department of Conservation (DOC) as unique farmland (12-acres).

Santa Barbara County LAFCO sets forth specific policies when considering annexation proposals that involve annexation of agricultural resources. (**Attachment B**) In addition, Government Code Section 56377 would be applicable.

Government Code Section 56377 states:

56377. In reviewing and approving or disapproving proposals which could reasonably be expected to include, facilitate, or lead to the conversion of existing open-space lands to uses other than open-space uses, the commission shall consider all of the following policies and priorities:

- (a) Development or use of land for other than open-space uses shall be guided away from existing prime agricultural lands in open-space use toward areas containing nonprime agricultural lands, unless that action would not promote the planned, orderly, efficient development of an area.
- (b) Development of existing vacant or nonprime agricultural lands for urban uses within the existing jurisdiction of a local agency or within the sphere of influence of a local agency should be encouraged before any proposal is approved which would allow for or lead to the development of existing open-space lands for non-open-space uses which are outside of the existing sphere of influence or the local agency.

The following written determinations are required by LAFCOs when establishing a sphere of influence for a jurisdiction according to section 56425(e) (1-5) of the Cortese-Knox-Hertzberg Act:

- Present and planned land uses in the area, including agriculture, and open space lands;
- Present and probable need for public facilities and services in the area;
- Present capacity of public facilities and adequacy of public services that the agency provides or is authorized to provide; and
- Existence of social or economic communities of interest in the area if the Commission determines that they are relevant to the agency.

- The present and probable need for those public facilities and services of any disadvantaged unincorporated communities within the existing sphere of influence.

One approach to address the loss of agricultural lands is to off-set a portion under conservation easements. LAFCO does not have a specific ratio requirement. The City of Lompoc does not have an off-set requirement either. The City identified a number of General Plan Land Use Element Policies that would limit impacts related to agricultural land conversion. The FEIR also identified Mitigation Measure LU-3 which states the following:

***“Mitigation Measures.** No mitigation is required for buildout within the existing City Limits or the proposed Wye Residential Expansion area. The following mitigation measure is required for buildout of the proposed Bailey Avenue Specific Plan, River or Miguelito Canyon expansion areas.*

LU-3 Purchase of Agricultural Conservation Easements (PACE) Program. The City shall include a new Implementation Measure in the 2030 Conservation/Open Space Element, as follows.

The City shall implement a program that facilitates the establishment and purchase of on- or off-site Agricultural Conservation Easements for prime farmland and/or important farmland converted within the expansion areas, at a ratio of 1:1 (acreage conserved: acreage impacted). A coordinator at the City shall oversee and monitor the program, which will involve property owners, developers, the City, and potentially a conservation organization such as The Land Trust for Santa Barbara County. Implementation of a PACE program shall be coordinated with similar efforts of Santa Barbara County.”

The use of terms and conditions could be used to address this issue. LAFCO would have to make a determination on Section 56377 supported by evidence.

The Fiscal Analysis prepared by Stanley Hoffman Associates, Inc. in 2017 estimated the Bailey Property would include 4.21 acres of open space/agriculture buffer and a bike path and the Bodger Property would include 9.70 acres of open space/agriculture buffer and a bike path available for public use. These uses are assumed to be privately maintained.

The adjacent agricultural uses to the west could potentially have conflicts with residential uses. A right-to-farm notification could be required to reduce conflicts. The FEIR identified the need for a 200-foot-wide open space setback buffer along the entire

western corridor boundary. Annexation Area A & B are located within this buffer area. The following is stated in the FEIR related to conflicts:

“Impacts to Residential Uses. Residents living adjacent to agricultural lands often cite odor nuisance impacts, noise from farm equipment, vehicle conflicts, dust, and pesticide spraying as land use conflicts. Conflicts between farm vehicles and high-speed automobiles used by residents on adjacent roadways can lead to accidents. Pesticide spraying can result in health hazards, while odor and noise are nuisances that can affect the enjoyment of private dwellings. Increased dust from soils and farm equipment can be both a nuisance and a health hazard. These conflicts can also result in reduced property values along the interface with agricultural uses.

Impacts to Agricultural Uses. The placement of residential development adjacent to farmland can have several negative impacts on farm operations. Direct physical impacts include vandalism to farm equipment or fencing and theft of fruits and vegetables. Soil compaction from trespassers or equestrians can also damage crop potential. Decreased air quality from adjacent urban development can also result in impacts to adjacent farmland.”

Compliance with 2030 General Plan Policies and the existing Zoning Ordinance were cited as mitigation to ensure that impacts related to land use compatibility were addressed. The FEIR also cited, “the 2030 General Plan proposes annexation of four unincorporated areas adjacent to the City. The proposed expansion areas could conflict with some provisions of the Santa Barbara County LAFCo’s Standards for Annexation to Cities. However, LAFCo must make the final determination of consistency.”

The Santa Barbara County P&D response dated September 28, 2018, also identifies the loss of prime agricultural lands inconsistency with the County Comprehensive Plan as well as the need for agricultural buffers. (**Attachment C**) The County P&D letter also references that in 1998, LAFCO recommended denial of a similar project on “Bailey Avenue Corridor” based on Section 56377. In 1999, a similar request was proposed regarding annexation of 15 acres north of Purisima Road to the Mission Hills CSD, LAFCO also denied that proposal.

Discouraging Urban Sprawl: The proposal would change the character of the Bailey Avenue corridor and add low density residential development throughout the 148-acre area. The 2030 General Plan would facilitate the development and redevelopment of lands within the Lompoc plan area. These areas include reuse of existing urbanized lands, infill development on vacant parcels, and new development on the urban fringe.

It should be noted that LAFCO is not allowed to determine land use, density or lot configuration of a proposed development; however, discouraging urban sprawl is key

legislative mandate of LAFCO found in the Cortese-Knox-Hertzberg Act and land use is a factor that LAFCO considers under GC 56668 in making its future annexation decision.

The evaluation of City build-out is based on LAFCO's policies regarding in-fill development and the build out of vacant properties. LAFCO policies also allow for the consideration of permitting sufficient land within each city in order to encourage economic development, reduce cost of housing and allow timing options for physical and orderly development. This build out information is needed prior to an annexation being considered by the Commission.

Housing-Affordability/Jobs-Housing Balance: The City's Policies 1.11 and 1.12 attempt to moderate their housing affordability disparity by requiring 10% of all residential projects containing 10 or more units to provide affordable housing to target income groups. The Bailey Avenue site does not have a specific identified project, so the number of affordable units and target ranges are not full known. Based on the estimates of the project description 47 units could be required to meet the City's policies.

The **jobs-to-housing ratio** in a jurisdiction is an overall indicator of both availability of jobs within an area, providing residents with an opportunity to work locally, and availability of housing, providing employees with adequate housing opportunities. The jobs-to-housing balance is a planning tool to review whether a community has a healthy balance between jobs and the housing supply available to potentially house workers for those jobs. In general, the City of Lompoc provides more housing than jobs in the region. Lompoc houses those employed within the community as well as approximately seven percent of Vandenberg AFB personnel. The SBCAG jobs/housing ratio forecasts for the City of Lompoc and Santa Barbara County are shown in Table below:

**SBCAG Jobs Housing Ratio for
the City of Lompoc and Santa Barbara County**

	2005	2010	2015	2020	2025	2030	2035	2040
City of Lompoc	1.03	1.11	1.13	1.16	1.17	1.17	1.17	1.18
Santa Barbara County	1.32	1.36	1.37	1.37	1.39	1.42	1.45	1.49

Source: SBCAG, 2007 Regional Growth Forecast, August 2008.

According to the Santa Barbara County Association of Governments (SBCAG), a jobs/housing ratio within the range of 0.75 to 1.25 evidences a job-housing balance. The FEIR cited a current jobs/housing ratio in Lompoc of 1.03, which is within the identified

range. However, per the correspondence between the City and County a ration of 0.74 is mentioned, which is also cited in the 2013 RHNA Plan. This ratio is more current than the one cited in the FEIR. The FEIR also analyzed the Jobs/Housing Balance for the Bailey Avenue expansion area if plans contemplated at the time of its review were to happen. The FEIR stated:

“Development in the Bailey Avenue Specific Plan expansion area would include up to 2,184 single family residential units, 534 multiple-family residential units, and 228,700 square feet of commercial space. Using a standard factor of one employee per 500 square feet, this commercial development would create approximately 457 new jobs. When added to the 2005 population and employment figures from SBCAG (Table 4.10-2), buildout of the Bailey Avenue Specific Plan expansion area would result in a jobs/housing ratio of 0.87, which is within the acceptable range identified by SBCAG.”

Although this project description is no longer used for the Bailey Annexation request it does provide for some analysis if residential development were to occur in the future. The FEIR also states the City has adequate land available to meet its fair share housing allocation.

“As noted in Section 2.0, Project Description of the FEIR, vacant parcels throughout the City are sufficient to meet Lompoc’s Regional Housing Needs Authority (RHNA) allocation for the 2007 to 2014 period. Expansion into the Bailey Avenue Specific Plan area is therefore not necessary to fully meet the City’s allocation. However, the Bailey Avenue Specific Plan expansion area is physically contiguous with the existing City boundaries and is therefore generally consistent with the above policies related to logical boundaries. In addition, this expansion area is within the existing City Urban Limit Line and may be considered a logical extension of the urban community, as it would create a straight western boundary to the City. The presence of existing urban development to the north, south and east also demonstrates this logical extension.”

The Santa Barbara County P&D response letter dated October 24, 2019, also identifies the jobs/housing balance and RHNA and housing capacity issues that identify alternative approaches to meeting the City’s goals while reducing communte travel for consistency with SBCAG Regional Transportation Plan/Sustainable Communities Strategy and the County Energy and Climate Action Plan. (**Attachment C**)

Wildland-Urban Interface or Other Hazards: According to Lompoc 2030 General Plan EIR, the majority of the Bailey Avenue Specific Plan expansion area was classified as a Low Wildland Fire Hazard Area with the southern portion of the area designated as a Moderate Wildland Fire Hazard Area. The Bailey and Bodger properties are located outside of the identified High and Very High wildfire hazard areas. The Lompoc Fire Department’s average response time standard of five minutes for four (4) personnel to

be on-scene, and a nine-minute Initial Full Assignment Response Time criterion for 14 personnel to be on scene. The current average response time is approximately 3.5 minutes. The addition of the Bailey Avenue site would continue to meet the five-minute response time standards with the small exception of the southwest corner of Annexation Area A (Bailey Property). Estimated response time for engines from VAFB Fire Department to Lompoc is approximately 10 to 15 minutes.

As part of the Addendum No. 3 the City updated its search of hazardous materials database conducted during the Initial Study (IS) and identified a Leaking Underground Storage Tank (LUST) cleanup site at the Bodger Seed development on the Bodger Property. The facility is identified to have three former gasoline and waste oil underground storage tanks. The identified LUST cleanup site has an "Open – Assessment and Interim Remedial Action" cleanup status and is currently being managed to avoid and/or minimize impacts due to hazardous materials release.

Water Supply and Wastewater Service.

Water: The City will provide water service to the project via new water lines that will be located under the internal roads for the proposed development. The project will include water service connections to an existing water main near Z Street, West Olive Street and West North Avenue. The projects potable water demand would likely be small. The City's water supply from local basin should be adequate. The FEIR states the following related to City water supply and demand (note the Bailey Avenue Specific Plan Area contemplated a larger area and project size) in the end the FEIR concluded the City water supply would be adequate to meet the demand of any part of the 2030 General Plan without causing overdraft or temporarily decreasing the capacity of the City's well field:

"According to the 2008 Water Resources Study, the City consumes 125 gallons per day per capita. This equates to 3,740 gallons per month and 44,625 gallons per year (or 0.1369 acre-feet per year) per capita. As of 2007, the City pumps a total of 5,600 AFY from the Lompoc Plain Basin. This is equivalent to pumping approximately 5 million gallons per day.

Based on 125 gallons per capita per day (GPCD), this population would increase water demand by 0.98 million gallons per day, or 1,096 AFY. However, because the Bailey Avenue Specific Plan site would be converted from agricultural uses to residential uses, on-site groundwater pumping and recharge would change. This would result in a 186 AFY decrease in net on-site groundwater use. This decrease would partially offset the increased pumping at the City's municipal wells, so the change in the overall groundwater balance for the Lompoc Plain due to buildout of the Bailey Avenue Specific Plan would be an increase of 910 AFY, or 0.88 MGD in groundwater

withdrawals. When added to the City's existing use, total groundwater withdrawals would be 5.88 MGD."

Wastewater: The City will provide wastewater service to the project as well. These would connections would tie into an existing sewer main near Z Street and West Olive Street. The City owns and operates the Lompoc Regional Wastewater Reclamation Plant (LRWRP), The LRWRP had a design capacity to treat an average flow of up to 5.0 million gallons per day (MGD) of wastewater. The plant was upgraded in 2009 to treat 5.5 MGD. Although the upgrades to the LRWRP will increase its treatment capacity, the City is prevented from discharging treated wastewater in an amount that would exceed its currently permitted flow of 5.0 mgd (ADWF). To discharge an amount that exceeds the 5.0 mgd (ADWF) the City would need to apply for a new waste discharge permit from the Regional Water Quality Control Board.

The LRWRP currently processes approximately a total of 3.06 MGD from wastewater sources in the City (2009), including 0.65 MGD from sources within Vandenberg Air Force Base, and 0.50 MGD from sources within Vandenberg Village. The City's average per capita wastewater flow is estimated to be 78 gallons per day. The FEIR states the following related to City wastewater capacity (note the Bailey Avenue Specific Plan Area compepleted a larger area and project size) in the end the FEIR concluded the City LRWRP in combination with the other communities served could support buildout:

Based on a rate of 78 gallons of wastewater generation per capita per day, this population would generate 610,506 gallons of wastewater per day. When added to existing wastewater flow, the City total would be 2.52 MGD. This wastewater would be treated at the Lompoc Regional Wastewater Reclamation Plant (LRWRP). VAFB and Vandenberg Village are also served by the LRWRP and would generate a maximum of 0.65 MGD and 0.50 MGD, respectively. Combined, waste generation would total 3.67 MGD. The LRWRP currently has a capacity of 5.0 MGD,

Traffic and Circulation: A traffic study was included in the FEIR that evaluated the overall 2030 General Plan update the focused on internal traffic, mixed-use, and alternative transportation modes. No specific analysis was prepared for the Baily Avenue Specific Plan Area similar to the other EIR Sections, so no further conclusion can be drawn. The 2017 Addendum, addressed updates to the transporation and circulation impacts and concluded the buildout scenarios included in the FEIR would not result in any new impacts. After final buildout with identified mitigation all roadway segments are expected to operate at a level of service (LOS) C or better. However, the new measurement for circulation is measured in vehicle miles traveled

(VMT), which took effect on July 1, 2020 and LOS system is no longer used for evaluation.

The Santa Barbara County Association of Governments (SBCAG) models the traffic and land use impacts to develop on a regional level. This modeling assist SBCAG in identifying adequate funding and timing of that funding that playing an important part in seeing circulation improvements in the area.

Other Factors/ Infrastructure, Financing and Timing: Other project components and design measures will need to be considered by the City. The City request that LAFCO take action on the Annexation request, then any proposed development would be processed through the City Development Review process with appropriate environmental review. A number of major infrastructure improvements would be required to facilitate the Specific Plan. The framework for necessary financing, responsibilities and timing to complete infrastructure improvements has not fully been discussed or known at this time. A Fiscal Impact Analysis prepared by Stanley Hoffman Associates, dated June 23, 2017 has been prepared to analyze possible financing options for the project. The application states since there is no application on file with the City for specific development, it is unknown at this time what specific financing methods will be included, although the report does make assumption regarding various revenue sources and costs.

Pursuant to City Policy 4.6 of the General Plan's Land Use Element, the fiscal analysis demonstrates that the annexation would promote orderly development commensurate with available resources and result in a positive fiscal relationship between costs for City facilities and services and the revenues generated subsequent to the annexation. While residential uses generally do not cover the full cost of municipal services from property and local sales taxes that are generated, the opportunity to require privately maintained amenities, roads and open space in residential development projects, coupled with the inclusion of commercial development suggests that SOI areas may be able to break even in terms of revenues versus costs of services. In December 2020, the median home price in the City was \$525,000. Since property taxes are calculated based on the sales price of homes, the higher the selling price the more property tax revenue would be generated. These issues would be thoroughly analyzed as the development review process moves forward for areas located in the SOI and being considered for annexation. The City would have to demonstrate the plan for services is feasible including any financing and come to agreement on a property tax exchange.

Property Tax Agreement: The City and County have not-opened the negotiation period to approve a property tax exchange (PTE) agreement. LAFCO must have a completed PTE before opening official hearings for the annexation. In the meantime, LAFCO staff will continue to hold study sessions to go over various components of the proposal to help everyone better understand the project.

As you can see many other items still need to be resolved. Work will continue on these matters until a resolution is known. LAFCO would not begin hearings on this annexation proposal until after the property tax exchange has been approved.

ENVIRONMENTAL IMPACT REPORT (FEIR) & ADDENDUM

The FEIR and Addendum completed for the Bailey Avenue Annexation includes mitigation measures relative to future development, there is a reference provided to the mitigation measures from Table ES-1 of the FEIR that presents a summary of the impacts, mitigation measures, and residual impacts from the implementation of the Project. In summary, the proposed Project (2030 General Plan Update) would result in significant and unavoidable long-term impacts to Clean Air Plan consistency, operational air quality emissions, cumulative air quality impacts, temporary and long-term increases in green-house-gas (GHG) emissions, GHG emissions reduction plan consistency, cumulative GHG emissions impacts, Clutural/Historical Resources, Prime Agricultural, traffic impacts at Ocean Avenue and A Street intersection, and H Street/Central Avenue intersection.

These impacts required specific Findings and adoption of a Statement of Overriding Consideration because certain impacts associated with future development are considered significant and unavoidable. As stated above the FEIR made some assumption about buildout potential of the Bailey Avenue Corridor which could include 2,184 single family residential units, 534 multiple-family residential units, and 228,700 square feet of commercial space. To this extent, some analysis was proformed, however, the FEIR acknowledge that additional CEQA analysis is needed to address what impacts would occur if the properties were annexed.

As a Responsible Agency, LAFCO has approval authority over part of the project; in this case the sphere of influence amendment and annexation. A Responsible Agency relies on the lead agencies environmental documentation to approve the portion of the project under its jurisdiction. As Lead Agency the City is required to completed the necessary environmental documents to comply with the California Environmental Quality Act (CEQA). Under CEQA, LAFCO is required to prepare and adopt its own

set of findings and statement of overriding considerations based on the City's environmental documentation. If LAFCO cannot make these findings, then annexation cannot be granted.

LAFCO POLICIES AND FACTORS

In 2016, LAFCO updated the Sphere of Influence (SOI) to the City of Lompoc. The need for an updated Municipal Services Review was not requested by the City. Overall, the City's SOI was reaffirmed which includes three areas outside of its incorporated boundary. The City is required to document adequate services to serve new annexation territory including water supply, wastewater, police and fire, and be financial capable. An update to the sphere of influence would document the determination under GC sec. 56425(e) outlined above. Identified any agricultural and open space lands being converted or protected and potentially recorded a conservation easement for the SOI areas considering annexation. A number of LAFCO Policies call for directing growth towards urban existing areas that have the capability of providing services. Other important LAFCO Policies include regarding agricultural preservation of prime farmland. Consistency with Government Code 56377, and adequate services among others will assist in making these decisions. **Attachment B** includes a number of LAFCO policies that will be addressed in the review of this annexation.

KEY FACTORS: CORTESE-KNOX-HERTZBERG ACT

Government Code Section 56668 identifies a number of factors that are to be considered by LAFCO in reviewing a proposal. As with all change of organizations (annexations, detachments, formations, dissolutions, etc.), these factors will be addressed in an attachment to the staff report. Each factor will be listed and a staff response provided for the Commissions consideration. The factors are intended to provide the Commission with information about certain topics that are often relevant to annexations.

The factors include information on:

• Population and Land Use	• Need for Services	• Impact on Adjacent Areas
• Commission Policies	• Agricultural Lands	• Definite Boundaries
• Consistency with General Plans and Reg. Trans. Plan	• Sphere of Influence	• Other Agency Comments
• Ability to provide services	• Availability of water supplies	• Housing
• Comments from landowner, voters or residents	• Existing information about existing land use	• Environmental Justice

Several key factors have been identified above that would be considered along with the impacts this proposed project may have on the environment. These factors would be analyzed in light of the record as the annexation process is undertaken.

LAFCO AUTHORITY

The definitions and legislative mandates from the CKH Act along with the factors above guide LAFCO's decision-making process. The local adopted policies provide LAFCO with guidance and discretion in regarding to a variety of topics. Government Code Section 56001 provides LAFCO with direction to perform this balancing act:

GC 56001. 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. 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. 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.

As a creation of the State Legislature with a broad mandate, LAFCO has been given “quasi-legislative” authority to complete its mission. This gives Commissioners “broad discretion in light of the record” to make determinations regarding LAFCO proposals.

This important responsibility is further spelled out in CKH Act as Commissioners using their “Independent Judgement” to make decisions:

GC 56325.1. While serving on the commission, all commission members shall exercise their independent judgment on behalf of the interests of residents, property owners, and the public as a whole in furthering the purposes of this division. Any member appointed on behalf of local governments shall represent the interests of the public as a whole and not solely the interests of the appointing authority. This section does not require the abstention of any member on any matter, nor does it create a right of action in any person.

The Commission should weigh the importance and significance of a particular factor when considering its decisions. Is water supply more important than housing? Should agricultural land be preserved, will a preservation ratio be adequate because of the other benefits of a project? Do all the factors when taken as a whole led to approval, or denial, of a proposal? It is not black and white; careful discretion, local circumstances and independent judgement are considered in the decision-making process.

SUMMARY

The information provided at this Study Session has been summarized from the documentation submitted by the City and County for this project. The City intended to develop and prepare a specific plan for this area. The Commission would need to determine consistency with GC 56377 based on evidence in the record. LAFCO retains discretion in determining the SOI. To modify a sphere of influence, LAFCO must also consider and prepare a written determination with respect to the factors in Government Code section 56425(e). The property must be within the SOI before annexation could occur.

A better approach would be for the City to complete the Bailey Avenue Specific Plan and then apply for annexation that comply with LAFCO policies. Also, the City should document the City buildout of existing available land within the City limits along with identifying agricultural areas that could potentially be protected. LAFCO staff will prepare and submit a comment letter highlighting many of the points found in this report and the feedback received at the Study Session.

Attachments

Attachment A -Bailey Avenue Proposal Questionnaire

Attachment B -LAFCO Policies

Attachment C -County Correspondence

Please contact the LAFCO office if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "M. Prater".

Mike Prater
Executive Officer

SANTA BARBARA LOCAL AGENCY FORMATION COMMISSION

Proposal Justification Questionnaire for Annexations, Detachments and Reorganizations

1. Name of Application:

Bailey Avenue Annexation

The Proposal includes the following:

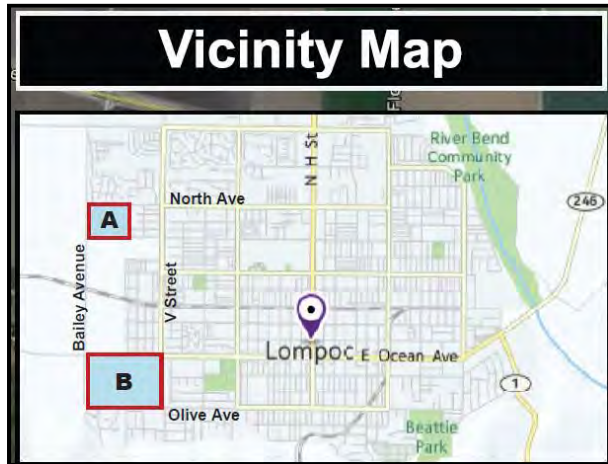
- Extend the City Limit Boundary and City Sphere of Influence Boundary to include the subject property as shown below:



- Detach the subject property from the County Service Area 32, the Santa Barbara County Fire Protection District, and the Mosquito and Vector Management District of Santa Barbara County

2. Describe the acreage and general location; include street addresses if known:

The Bailey Avenue Annexation Proposal consists of two non-contiguous properties located with the northerly and southerly portions of the Bailey Avenue Corridor adjacent to the Lompoc City Limit as shown in the Vicinity Map below:



The two properties are held under separate ownership as follows:

- The Bailey Avenue Property – Area A – an approximately 40.6-acre property owned by LB & L-DS Ventures, Lompoc II LLC., Assessor Parcel No. 093-070-065
- The Bodger Property – Area B – an approximately 107.7-acre property, owned by John Bodger & Sons Co., a corporation, Assessor Parcel No.s 093-111-007, -008, -009, -010, 011, -012

3. List the Assessor's Parcels within the proposal area(s):

Bailey Property Annexation Area A	Gross Acres (Existing)	
	Assessor Parcels	Existing Uses
Agriculture	093-070-065	38.48
Adjacent Roads	093-070-027 093-070-065	2.16
Total		40.64

Bodger Property Annexation Area B	Gross Acres (Existing)	
	Assessor Parcels	Existing Uses
Agriculture	093-111-007, 008, 009, 010, 011 & 012	98.39
Adjacent Roads	093-909-026 093-111-006, 007, 009, 011 & 012	9.32
Total		107.71

4. Purpose of proposal: (Why is this proposal being filed? List all actions for LAFCO approval. Identify other actions that are part of the overall project, i.e., a tract map or development permit.)

The applicant has requested the City initiate an Annexation proposal based upon the City of Lompoc General Plan designations where the City Council maintained the Bailey Avenue Corridor within the Urban Limit Line containing Low and Very-Low Density Residential designations from the 1997 General Plan. These land use designations would allow for the development of 87 residential units on the Bailey property, 382 residential units on the Bodger property, and 364 residential units on the balance of the Bailey Avenue Corridor. No development is proposed with the current request. Following an affirmative action on the Annexation request, any proposed development would be processed through the City Development Review process with appropriate environmental review pursuant to the California Environmental Quality Act (CEQA).

5. Land Use and Zoning - Present and Future

The two properties are located within the unincorporated areas of Santa Barbara County.

- A. Describe the existing land uses within the proposal area. Be specific.

- The Bailey Property is currently used for agricultural purposes.
- The Bodger Property is currently used for agricultural purposes and there are existing structures such as agricultural support buildings, greenhouses, etc. on the site.

- B. Describe any changes in land uses that would result from or be facilitated by this proposed boundary change.

- There is no change in the existing land use proposed at this time. Following an affirmative action on the Annexation request, any proposed development would be processed through the City Development Review process with appropriate environmental review pursuant CEQA requirements.

- C. Describe the existing zoning designations within the proposal area.

The Bailey Property – Area A currently has a Santa Barbara County Zoning Designation of AG-II-100.

The Bodger Property – Area B currently has a Santa Barbara County Zoning Designation of AG-II-40.

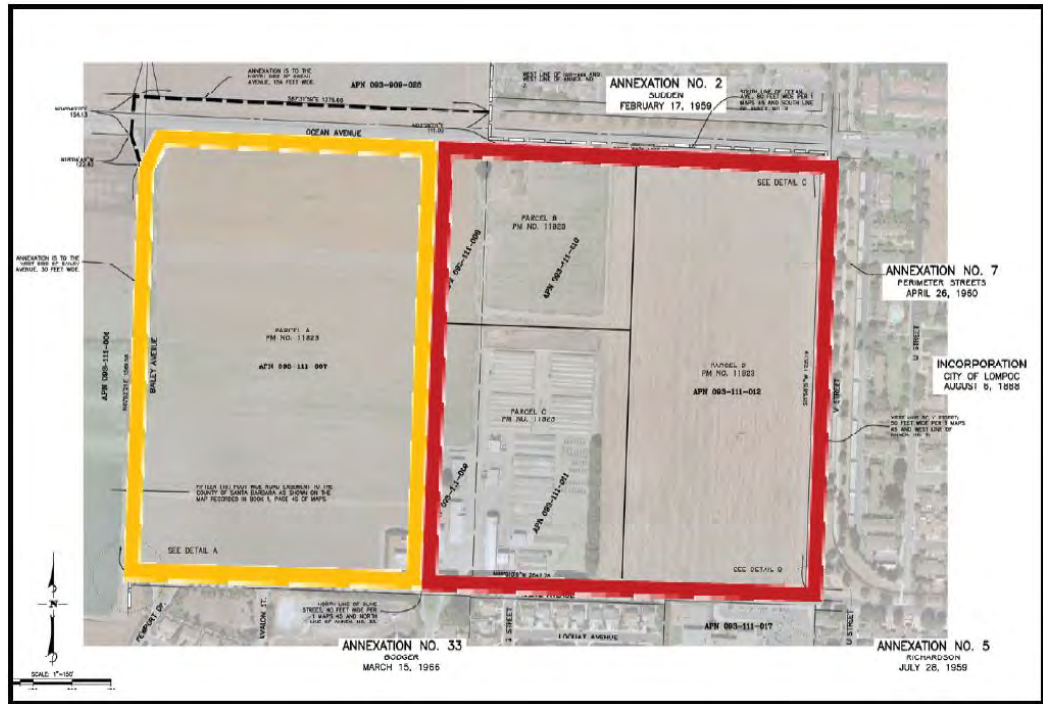
- D. Describe any proposed change in zoning for the proposal area. Do the existing and proposed uses conform with this zoning?
- As highlighted in red below, the Bailey Property (Area A) currently has a Santa Barbara County Zoning Designation of AG-II-100. The City Zoning designation that would be consistent with the 2030 General Plan Land Use Designation of Very Low Density Residential would be Residential Agricultural (RA).

Bailey Property (Annexation Area A)



- As shown in yellow and red below, the Bodger Property (Area B) currently has a Santa Barbara County Zoning Designation of Ag-II-40.
- The property currently has two City of Lompoc 2030 General Plan Land Use Designations on it. The City Zoning designation that would be consistent with the 2030 General Plan Land Use Designation of Very Low Density Residential designation (shown in red) would be Residential Agricultural (RA) and for the Low Density Residential designation (shown in yellow) would be Residential Agricultural (RA).

Bodger Property (Annexation Area B)



There is no change in the existing uses proposed at this time. Following an affirmative action on the annexation request, any proposed development would be processed through the City Development Review process with appropriate environmental review pursuant CEQA requirements.

- E. (For City Annexations) Describe the rezoning that will apply to the proposal area upon annexation. Do the proposed uses conform with this rezoning?

Lompoc Zoning Ordinance Sec. 17.012.050 expressly provides that the added territory, upon annexation, be designated R-A - Residential Agricultural. Under the R-A designation, uses would be restricted to a combination of agriculture and large lot residential (at a density of 2.2 dwellings per acre).

This designation would allow a maximum of 301 dwellings; however, no specific development project is proposed at the present time.

	Net Buildable Acres	Allowed Units Per Acre	Prezoning Upon Annexation	
			Designation	Allowed Dwellings
Bailey Property	38.48	2.2	"R-A" Residential Agricultural	85
Bodger Property	98.39	2.2		216
Total	136.78			301

F. List all known entitlement applications pending for the property (i.e., zone change, land division or other entitlements).

No applications are currently pending or on file with the City of Lompoc.

6. Describe the area surrounding the proposal

Using Table A, describe existing land uses, general plans and zoning designations for lands adjacent to and surrounding the proposal area. The application is incomplete without this table.

Bailey Property: Annexation Area A			
	Existing Land Use	General Plan Designation	Zoning Designation
East	Residential	LDR Low Density Residential (City)	7R1 Single Family Residential (7,000 S.F. Minimum Lot Size) (City)
West	Agriculture	AC Agricultural Commercial (County)	AG-II-100 (County)
North	Residential	LDR Low Density Residential (City)	7R1PD Single Family Residential (7,000 S.F. Minimum Lot Size) Planned Development (City)
South	Agriculture	AC Agricultural Commercial (County)	AG-II-40 (County)

Bodger Property: Annexation Area B			
	Existing Land Use	General Plan Designation	Zoning Designation
East	Residential	HDR, MDR & LDR High, Medium & Low Density Residential (City)	OS Open Space & R3PD Multiple Family Residential Planned Development (City)
West	Agriculture	AC Agricultural Commercial (County)	AG-II-100 (County)
North	Agriculture & Residential	AC Agricultural Commercial (County) & LDR Low Density Residential (City)	AG-II-40 (County) & 7R1 and CC (City)
South	Residential	CF Community Facility & LDR Low Density Residential (City)	7R1, 7R1PD & PF Single Family Residential & Public Facility (City)

7. Conformity with Spheres of influence

A. Is the proposal area within the Sphere of Influence of the Annexing agency?

No, the subject properties are outside the City’s Sphere of Influence

B. If not, include a proposal to revise the Sphere of influence.

The Annexation request includes an adjustment to the City’s Sphere of Influence boundaries as shown on attachments 7 and 8 with the accompanying exhibits/maps contained with this application.

8. Conformity with County and City General Plans

A. Describe the existing County General Plan designation for the proposal area.

Bailey Property: Area A - AC Agricultural Commercial
 Bodger Property: Area B – A-II Agriculture II

B. (For City Annexations) Describe the City General Plan Designation for the area.

Bailey Property: Area A - Very Low Density Residential
 Bodger Property: Area B – Very Low Density Residential and Low Density Residential

C. Do the proposed uses conform with these plans? If not, please explain.

No change in uses is proposed as part of the LAFCO Annexation request. The current use on both properties is agricultural use which conforms to both the County and City General Plan.

9. Topography and Natural Features

A. Describe the general topography of the proposal area and any significant natural features that may affect the proposal.

- Mostly flat with a slight gradient change from NE to SW.

B. Describe the general topography of the area surrounding the proposal.

- Mostly flat with a slight gradient change from NE to SW.

10. Impact on Agriculture

A. Does the affected property currently produce a commercial agricultural commodity?

- Yes -- Portions of both the Bailey and Bodger Properties are currently cultivated for agricultural purposes.

B. Is the affected property fallow land under a crop rotational program or is it enrolled in an agricultural subsidy or set-aside program?

- No

C. Is the affected property Prime Agricultural Land as defined in Government Code §56064?

- Yes

D. Is any portion of the proposal area within a Land Conservation (Williamson) Act contract?

- No

1) If "yes," provide the contract number and the date the contract was executed.

2) If "yes", has a notice of non-renewal be filed? If so, when?

3) If this proposal is an annexation to a city, provide a copy of any protest filed by the annexing city against the contract when it was approved.

11. Impact on Open Space Is the affected property Open Space land as defined in Government Code Section 65560?

Neither the Bodger or Bailey properties are designated on a local, regional, or state open-space plan as being reserved for that expressed purpose.

12. Relationship to Regional Housing Goals and Policies (City annexations only)

If this proposal will result in or facilitate an increase in the number of housing units, describe the extent to which the proposal will assist the annexing city in achieving its fair share of regional housing needs as determined by SBCAG.

The City's adopted Housing Element for the 2015/2022 planning cycle has a RHNA goal of 525 units. Additionally, the City has agreed to two additional units with the Summit View Annexation in 2015 (Annexation 78).

This brings the City's total RHNA goal to 527 dwelling units. City of Lompoc Housing Element Policy 1.11 requires 10 percent of all new homes be affordable to, and occupied by, target income households. If there would be a favorable determination on the annexation request, it is anticipated that the City and the County would negotiate additional dwelling units be added to the City's existing RHNA requirement. Based upon the projected 301 dwelling units allowed under the existing General Plan densities, the City would be required to accept 30 additional units.

13. Population

A. Describe the number and type of existing dwelling units within the proposal area.

- None, the Bailey Property and the Bodger Property are currently undeveloped and do not have residential uses on them.

B. How many new dwelling units could result from or be facilitated by the proposal?

Single-family 301 Multi-family 0

14. Government Services and Controls – Plan for Providing Services (per §56653)

A. Describe the services to be extended to the affected territory by this proposal.

The City of Lompoc would provide Water services, Wastewater services, Electric services, Solid Waste services, Fire Protection and Emergency Medical Services, Police Protection, Parks and Recreation opportunities, and Library services for a future development.

Natural gas would be provided by the Southern California Gas Company. Numerous telephone companies including AT&T and Comcast are available in the City. The Lompoc Unified School District (LUSD) provides educational facilities to the entire Lompoc Valley.

A Fiscal Impact Analysis prepared by Stanley Hoffman Associates, dated June 23, 2017 (Attachment No. 16) has been prepared to analyze possible service requirements for the project. Since there is no application on file with the City for specific development, it is unknown at this time what services are required. Following an affirmative action on the annexation request, a development proposal would be processed through the City Development Review Process and service requirements would become known at that time.

- B. Describe the level and range of the proposed services.

A Fiscal Impact Analysis prepared by Stanley Hoffman Associates, dated June 23, 2017 (Attachment No. 16) has been prepared to analyze possible service requirements for the project. Since there is no application on file with the City for specific development, it is unknown at this time what services are required. Following an affirmative action on the annexation request, a development proposal would be processed through the City Development Review Process and service requirements would become known at that time.

- C. Indicate when the services can feasibly be provided to the proposal area.

There is no application on file with the City for specific development and it is unknown at this time what services are required. Following an affirmative action on the annexation request, a development proposal would be processed through the City Development Review Process and service requirements would become known at that time.

- D. Indicate any improvements or upgrading of structures, roads, sewers or water facilities or other conditions that will be required as a result of the proposal.

There is no application on file with the City for specific development and it is unknown at this time what improvements or upgrading of structures, roads, sewers or water facilities or other conditions are required. Following an affirmative action on the annexation request, a development proposal would be processed through the City Development Review Process and infrastructure improvement requirements would become known at that time.

- E. Identify how these services will be financed. Include both capital improvements and ongoing maintenance and operation.

A Fiscal Impact Analysis prepared by Stanley Hoffman Associates, dated June 23, 2017 (Attachment No. 16) has been prepared to analyze possible financing options for the project. Since there is no application on file with the City for specific development, it is unknown at this time what specific financing methods will be negotiated.

Following an affirmative action on the annexation request, a development proposal would be processed through the City Development Review Process and details of capital improvement and ongoing maintenance and operations financing will be determined at that time.

- G. Identify any alternatives for providing the services listed in Section (A) and how these alternatives would affect the cost and adequacy of services.

No alternatives are suggested.

15. Ability of the annexing agency to provide services

Attach a statement from the annexing agency describing its ability to provide the services that are the subject of the application, including the sufficiency of revenues (per Gov't Code §56668j).

There is no application on file with the City for specific development and it is unknown at this time what services are required. Following an affirmative action on the annexation request, a development proposal would be processed through the City Development Review Process and service requirements would become known at that time.

16. Dependability of Water Supply for Projected Needs (as per §56653)

If the proposal will result in or facilitate an increase in water usage, attach a statement from the retail water purveyor that describes the timely availability of water supplies that will be adequate for the projected needs.

The City of Lompoc is the retail water purveyor. There is no application on file with the City for specific development and it is unknown at this time what water useage is needed. Following an affirmative action on the annexation request, a development proposal would be processed through the City Development Review Process and water requirements would become known at that time.

17. Bonded indebtedness and zones – These questions pertain to long term debt that applies or will be applied to the affected property.

Do agencies whose boundaries are being changed have existing bonded debt? N/A
If so, please describe.

- B. Will the proposal area be liable for payment of its share of this existing debt? N/A
If yes, how will this indebtedness be repaid (property taxes, assessments, water sales, etc.)

- C. Should the proposal area be included within any 'Division or Zone for debt repayment? N/A If yes, please describe.
- D. (For detachments) Does the detaching agency propose that the subject territory continue to be liable for existing bonded debt? N/A . If yes, please describe.

18. Environmental Impact of the Proposal

- A. Who is the "lead agency" for this proposal? City of Lompoc
- B. What type of environmental document has been prepared?
None, Categorically Exempt -- Class _____
EIR _____ Negative Declaration _____ Mitigated ND _____
Subsequent Use of Previous EIR Identify the prior report. City of Lompoc, General Plan Update Final EIR and Addendum 3 (State Clearinghouse #2008081032).
- A. If an EIR has been prepared, attach the lead agency's resolution listing significant impacts anticipated from the project, mitigation measures adopted to reduce or avoid significant impacts and, if adopted, a "Statement of Overriding Considerations."

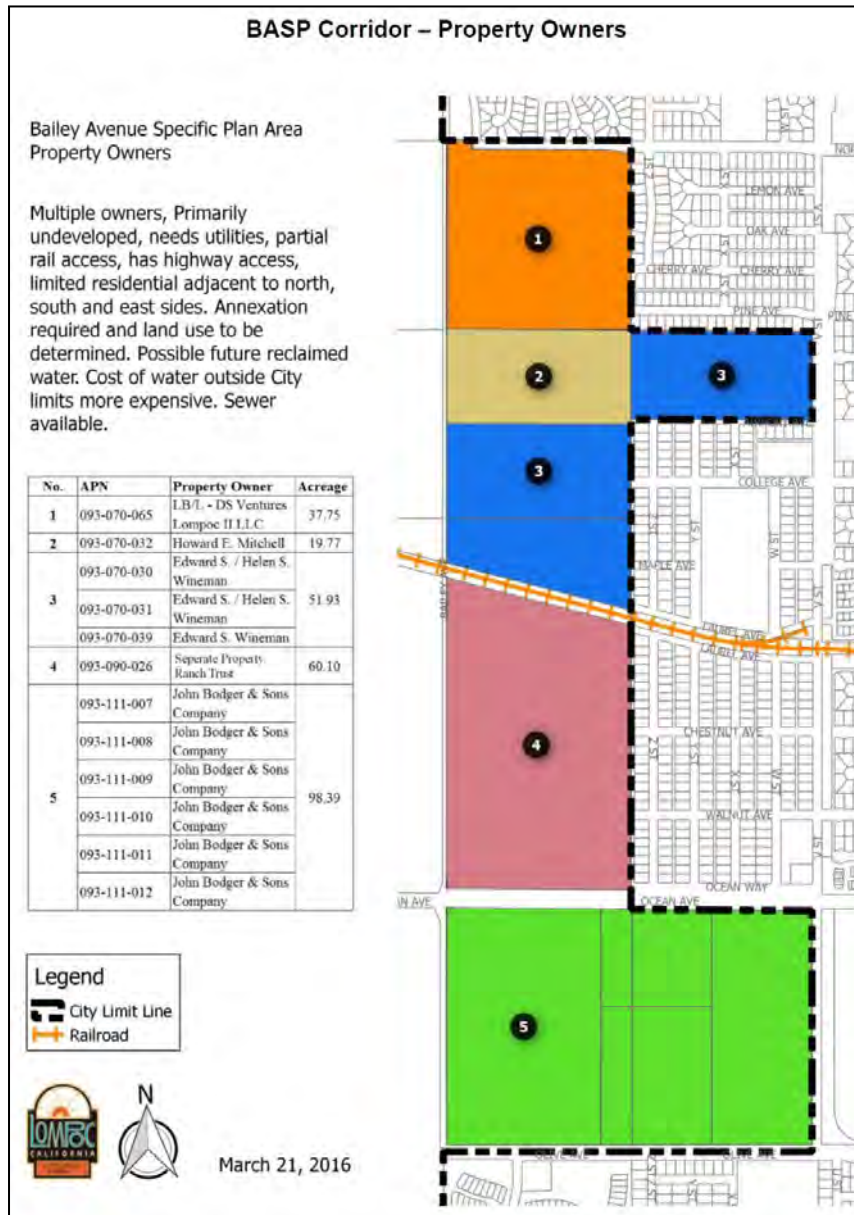
Included as attachment 9 (Certified FEIR) and 10 (Addendum) in application.

19. Boundaries

- A. Why are these particular boundaries being used? Ideally, what other properties should be included in the proposal?

The Bailey Avenue Corridor (BAC) totals approximately 268 acres on the western edge of the City of Lompoc. The BAC is under five separate ownerships and the only owners interested in proceeding with annexation at present are the Bailey and Bodger properties (identified as No. 1 and No. 5 in the graphic below).

Property Ownership



Annexation of the entire area at one time is not required. The City’s General Plan allows gradual annexation provided that development and infrastructure are fully coordinated to assure interconnectivity. City review of future land use entitlement requests will assure conformance with General Plan policies.

- B. If any landowners have included only part of the contiguous land under their ownership, explain why the additional property is not included.

Not applicable

20. Final Comments

- A. Describe any conditions that should be included in LAFCO's resolution of approval.

None

- B. Provide any other comments or justifications regarding the proposal.

None

- C. Enclose all pertinent staff reports and supporting documentation related to this proposal. Note any changes in the approved project that are not reflected in these materials.

Staff reports, associated resolutions and supporting documentation (ie. Fiscal Impact Analysis, County Consultation, etc.) have been attached to the application.

21. Notices and Staff Reports

List up to three persons to receive copies of the LAFCO notice of hearing and staff report.

Name

Address

- | | |
|--|--|
| A. Brian Halvorson | 100 Civic Center Plaza - Lompoc, CA 93436 |
| B. Marc Annotti and Jack Bodger
(Applicants/Owners) | 6363 Wilshire Blvd, Suite 600, Los Angeles, CA 90048 |
| C. Richard Monk (Applicant Counsel) | 1126 Santa Barbara Street, Santa Barbara, CA 93102 |

LAFCO Proposal Questionnaire
Bailey Avenue Annexation Request
Page 15

Who should be contacted if there are questions about this application?

<u>Name</u>	<u>Address</u>	<u>Phone</u>
Brian Halvorson	100 Civic Center Plaza - Lompoc, CA 93436	(805) 875-8228

Signature 
Teresa Gallavan, Interim City Manager

Date 7-25-18

Attachment B

LAFCO Policies

POLICY GUIDELINES AND STANDARDS

LAFCO's are charged with establishing policies and exercising their powers “. . . 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” and with “. . . the discouragement of urban sprawl and the encouragement of the orderly formation and development of local agencies based upon local conditions and circumstances.” (Government Code Sections 56300 and 56301) In carrying out its responsibilities, each LAFCO must conduct various studies and review and make determinations on changes of organization, reorganizations and spheres of influence. The following policies and standards have been adopted by the Santa Barbara LAFCO to assist in the review of proposals and the preparation of studies as necessary.

I. POLICIES ENCOURAGING ORDERLY FORMATION AND DEVELOPMENT OF AGENCIES

1. Any proposal for a change or organization or reorganization shall contain sufficient information to determine that adequate services, facilities, and improvements can be provided and financed by the agencies responsible for the provision of such services, facilities, and improvements.
2. All lands proposed for annexation to cities shall be rezoned prior to the submission of an application to the Local Agency Formation Commission. The City shall be lead agency for environmental review in such cases, and environmental documentation shall accompany the application.
3. Reorganization of overlapping and competing agencies or the correction of illogical boundaries dividing agency service areas is recommended. The Commission encourages reorganizations, consolidations, mergers, or dissolutions where the result will be better service, reduced cost, and/or more efficient and visible administration or services to the citizens.
4. In order to minimize the number of agencies providing services proposals for formation of new agencies shall be discouraged unless there is evidenced a clear need for the agency's services from the landowners and/or residents; there are no other existing agencies that are able to annex and provide similar services; and there is an ability of the new agency to provide for an finance the needed new services.

Attachment B

LAFCO Policies

II. SPHERE OF INFLUENCE POLICIES

A sphere of influence establishes the probably ultimate physical boundaries and service area of each governmental agency within the county. Once adopted, these spheres of influence are to be used by the Commission as one factor in making decision on proposal over which it has jurisdiction and as a basis for recommendations on governmental reorganization. A proposal shall not be approved solely because the area falls within the sphere of influence of an agency.

Sphere of Influence determinations are to be reviewed periodically and changed or updated as circumstances may require in the opinion of LAFCO. Such periodic review should be made approximately every five years.

The Commission will generally apply the following policy guidelines in spheres of influence determinations while also taking into account local conditions and needs.

1. The plans and objectives contained within the adopted General Plans of the cities and the county will be supported. In cases where these plans are inconsistent, the Commission will adopt findings relative to its decision.
2. Community-centered urban development will be encouraged wherever justified on the basis of reduced cost of desired levels of community services, energy conservation, and preservation of agricultural and open space resources.
3. Duplication of authority to perform similar service functions in the same territory will be avoided.
4. Multiple-service agencies will be preferred to a number of limited services districts. In this regard, city provision of multiple services will be preferred where possible because of the substantially broader authority and responsibility to provide services and controls to their constituencies, including land-use planning controls.
5. Where possible, a single larger agency rather than a number of adjacent smaller ones, established for a given service in the same general area, will be preferred.
6. An economically sound base for financing services without including territories which will not benefit from the services will be promoted.
7. Sphere of influence lines shall seek to preserve community identity and boundaries and will urge the political and functional consolidation of local government agencies that cross-cut those affected communities.

Attachment B

LAFCO Policies

8. Sphere of influence lines may be larger or smaller than existing local agency boundaries and may lead to recommendations for changes of organization.
9. Agencies which do not have major impact upon land, road, or capital facilities planning (such as cemetery districts) shall general have a sphere of influence which is coterminous with their existing jurisdictional boundaries.
10. Agricultural resources and support facilities should be given special consideration in sphere of influence designations. High 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.
11. The Commission will consider area-wide needs for governmental services and evaluate individual districts serving the area as they relate to the total system of the existing local government in the community and alternative arrangements.

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

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.

Attachment B

LAFCO Policies

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.

VI. Policies for City Annexations

Factors Favorable to Approval:

1. Proposal would eliminate islands, corridors, or other distortion of existing boundaries.
2. Proposed area is urban in character or urban development is imminent, requiring municipal or urban-type services.
3. Proposed area can be provided all urban services by agency as shown by agency service plan and proposals would enhance the efficient provision of urban services.

Attachment B

LAFCO Policies

4. Proposal is consistent with the adopted spheres of influence and adopted general plans.
5. Request is by an agency for annexation of its publicly-owned property, used for public purposes.

Factors Unfavorable to Approval:

6. Proposal would create islands, corridors or peninsulas of city or district area or would otherwise cause or further the distortion of existing boundaries.
7. The proposal would result in a premature intrusion of urbanization into a predominantly agricultural or rural area.
8. For reasons of topography, distance, natural boundaries, or like considerations, the extension of services would be financially infeasible, or another means of supplying services by acceptable alternatives is preferable.
9. Annexation would encourage a type of development in an area which due to terrain, isolation, or other economic or social reason, such development is not in the public interest.
10. The proposal appears to be motivated by inter-agency rivalry, land speculation, or other motives not in the public interest.
11. Boundaries of proposed annexation do not include logical service area or are otherwise improperly drawn.
12. The proposal is inconsistent with adopted spheres of influence and adopted general plans.

XII. EXTENDING URBAN UTILITY SERVICES TO AGRICULTURAL PARCELS

It is the policy of the Commission to protect and preserve agriculture by avoiding the extension of potable water or wastewater services (sewers) to agriculturally zoned land because this fosters uses other than agriculture.

Any LAFCO approval of a change of organization or out of agency service agreement that allows the extension of potable water or wastewater services to a parcel zoned for agricultural use will only be approved, if at all, if the approval is limited to that portion of the parcel that includes an approved use that needs potable water or wastewater services, provided the use does not compromise agricultural viability.

Attachment B

LAFCO Policies

This policy shall not be construed as indicating the Commission will approve proposals that lead to non-agricultural uses on agricultural parcels but rather indicates that should such approval be granted it is to be restricted to the specific area in which an approved land use requiring potable water or wastewater services is to occur.



County of Santa Barbara Planning and Development

Lisa Plowman, Director

Jeff Wilson, Assistant Director

Steve Mason, Assistant Director

December 18, 2019

Mr. Brian Halvorson, Planning Manager
City of Lompoc
100 Civic Center Plaza
Lompoc, California 93436

Email: b_halvorson@ci.lompoc.ca.us

Re: Response to Draft Memorandum of Agreement for the City of Lompoc Bailey Avenue Sphere of Influence and Annexation Proposal

Dear Mr. Halvorson:

Thank you for your letter dated December 6, 2019, that includes a draft memorandum of agreement (MOA) for the City of Lompoc's (City) proposed Bailey Avenue Sphere of Influence (SOI) change and Annexation Proposal (Bailey Avenue Proposal).

In the letters dated September 28, 2018, and October 24, 2019 (Attachment 1 and 2, respectively), Planning and Development Department (P&D) staff described policy conflicts and the County's recommended actions to avoid such conflicts, regarding the Bailey Avenue Proposal. At our last coordination meeting on October 24, 2019, P&D and Local Agency Formation Commission (LAFCO) staff communicated concerns regarding these policy conflicts associated with the Bailey Avenue Proposal. On November 26, 2019, the County sent a letter to Paul Hood, LAFCO's Executive Officer, summarizing the policy issues and concerns regarding this proposal (Attachment 3).

Because there have been no revisions to the Bailey Avenue proposal that address the policy conflicts and other concerns communicated previously to the City, the County respectfully cannot support the proposal and declines the opportunity to enter into the MOA with the City.

If you have any questions or require further information, please contact me at (805) 568-2086 or Dan Klemann at (805) 568-2072.

Regards,



Lisa Plowman, Director
Planning & Development Department

Attachment 1: County Comment Letter on City of Lompoc Bailed Avenue Proposal, dated September 28, 2018

Attachment 2: County Response Letter to Lompoc Comment Response Letter, dated October 24, 2019

Attachment 3: County Letter to LAFCO regarding the City of Lompoc Bailey Avenue Sphere of Influence and Annexation Proposal, November 26, 2019

c: Paul Hood, Executive Officer, Santa Barbara County LAFCO
Dan Klemann, Deputy Director, Long Range Planning Division
Whitney Wilkinson, Senior Planner, Planning and Development Department
City of Lompoc Mayor and City Council
Jim Throop, City Manager, City of Lompoc
Brad Wilkie, Utilities Director, City of Lompoc
Michael Luther, Public Works Director, City of Lompoc
Christie Alarcon, Community Development Director
Dean Albro, Management Services Director, City of Lompoc
Dennis Bozanich, Deputy County Executive Officer, Santa Barbara County Executive Office
Rachel Lipman, Fiscal and Policy Analyst, County Executive Office, County of Santa Barbara
Santa Barbara County Agricultural Commissioner's Office
File


ATTACHMENT 1



**COUNTY OF SANTA BARBARA
PLANNING AND DEVELOPMENT
LONG RANGE PLANNING
MEMORANDUM**

Date: September 28, 2018

To: Brian Halvorson, Planning Manager
City of Lompoc

From: Dan Klemann, Deputy Director
Long Range Planning Division 

Subject: City of Lompoc Bailey Avenue Sphere of Influence and Annexation Proposal,
Long Range Planning Division Informal Review – Preliminary Comments

Long Range Planning Division staff prepared the following preliminary comments on the City of Lompoc's Bailey Avenue Sphere of Influence and Annexation Proposal at your request to help facilitate our upcoming meeting on October 1, 2018. Our preliminary comments are based upon the City's "Bailey Avenue Annexation Fiscal Impact Analysis" report (June 2017). At this time, the City has not submitted a formal application for the proposed project to the Santa Barbara Local Agency Formation Commission (LAFCO). The County will provide an official, comprehensive review of the proposed project after the City submits an application to LAFCO. In the meantime, Long Range Planning Division staff welcomes any new information the City wishes to provide that further clarifies the project description and/or might alter the preliminary comments in this memorandum.

Subject Properties

Annexation Area A (Bailey Property): APN 093-070-065, (No Address) W. North Avenue.

Annexation Area B (Bodger Property): APN 093-111-007, 1859 W. Olive Avenue; APN 093-111-008, No Address W. Olive Avenue; APN 093-111-009, 1851 W. Olive Ave; APN 093-111-010, (No Address) W. Olive Avenue; APN 093-111-011, 1851 W. Olive Ave; APN 093-111-012, (No Address) W. Olive Avenue.

Site Description

Annexation Area A is a 37.74-acre assessor's parcel in unincorporated Santa Barbara County. The parcel is designated as Rural and Agricultural Commercial in the County Comprehensive Plan [Land Use Map](#) and designated as AG-II-100 (minimum gross lot area of 100 acres) in the Land Use and Development Code (LUDC) [Zoning Map](#). The parcel currently supports irrigated crops, contains no structures, and the north and east sides of the parcel adjoin the City of Lompoc's SOI. The parcel is adjoined by single-family residential development to the north and east, and agricultural land to the south and west. (See Attachment A.)

Annexation Area B consists of six contiguous assessor's parcels totaling 97.51 acres in unincorporated Santa Barbara County. The parcels are all designated as Rural and AG-II in the County Comprehensive Plan [Land Use Map](#) and AG-II-40 (minimum gross lot area of 40 acres) in the LUDC [Zoning Map](#). The current land uses on the parcels include flowers, irrigated field crops, maintenance facilities, storage sheds, greenhouses, and residences. The parcels are bordered to the west and northeast by agricultural land, and residential development to the northeast, east, and south. (See Attachment A.)

The California Department of Conservation map of the [Santa Barbara County Important Farmland 2016](#) designates both annexation areas as Prime Farmland. Together the annexation areas comprise approximately 0.2% of the approximately 66,969 acres of Prime Farmland in Santa Barbara County (2016 Important Farmland data, California Department of Conservation). The parcels are not currently subject to a Williamson Act agricultural preserve contract.

The City has not provided any documentation regarding the legal status of the subject parcels. The application to LAFCO should demonstrate how many legal lots exist within Areas A and B.

Proposed Project

The proposed project expands the City's SOI to include Areas A and B and annexes both areas to the City of Lompoc. The City then intends to process a general plan amendment and rezone for both areas to allow for subdivision and subsequent residential development. Specifically, the City would rezone Area A to permit 87 single-family units on 32.1 acres, with the remaining 4.2 acres as an open space/agricultural buffer. The City would rezone Annexation Area B to permit 382 single-family units on 86.2 acres, with the remaining 9.7 acres as an open space/agricultural buffer.

LAFCO Project History

The City of Lompoc submitted an application to LAFCO for a SOI amendment in November 1998. The application included the 272-acre "Bailey Avenue Corridor" as one of four proposed SOI expansion areas. The Bailey Avenue Corridor included Annexation Areas A and B as well as the properties between Annexation Areas A and B, which totaled approximately 138 acres. (See Attachment B.)

LAFCO staff recommended that LAFCO deny the inclusion of the Bailey Avenue Corridor within the City's SOI in its December 2, 1998, report to LAFCO. LAFCO staff cited sections 56377 and 56300 of the California Government Code that guide development away from prime agricultural land, and toward existing vacant or nonprime agricultural lands that exist within the jurisdiction of a local agency. LAFCO subsequently denied the City's request to include the Bailey Avenue Corridor in the City's SOI on March 11, 1999.

Preliminary Policy Consistency

Relevant County Comprehensive Plan policies are presented below, with a policy consistency analysis following each topic. Although the project would provide certain benefits to the City of Lompoc (e.g., increased housing stock and increased property tax revenue), staff's preliminary analysis revealed that the proposed project appears to be inconsistent with the policies set forth below. Related topics follow this policy consistency section.

Agricultural Element

The County Comprehensive Plan Agricultural Element includes the following goals and policies intended to conserve and protect agricultural resources:

- **GOAL I.** Santa Barbara County shall assure and enhance the continuation of agriculture as a major viable production industry in Santa Barbara County. Agriculture shall be encouraged. Where conditions allow, (taking into account environmental impacts) expansion and intensification shall be supported.
 - **Policy I.F.** The quality and availability of water, air, and soil resources shall be protected through provisions including but not limited to, the stability of Urban/Rural Boundary Lines, maintenance of buffer areas around agricultural areas, and the promotion of conservation practices.

The proposed project would establish buffers between new residential development and adjacent agricultural areas. However, it would also alter the Urban/Rural boundary and convert soil and agricultural land to residential uses. Therefore, the proposed project appears to be consistent with one, but not all, aspects of Policy I.F.

- **GOAL II.** Agricultural lands shall be protected from adverse urban influence.
 - **Policy II.C.** Santa Barbara County shall discourage the extension by the Local Agency Formation Commission (LAFCO) of urban spheres of influence into productive agricultural lands designated Agriculture II (A-II) or Commercial Agriculture (AC) under the Comprehensive Plan.
 - **Policy II.D.** Conversion of highly productive agricultural lands, whether urban or rural, shall be discouraged. The County shall support programs which encourage the retention of highly productive agricultural lands.

The SOI boundary change and annexation would extend the City's SOI into agricultural lands and convert approximately 135 acres of productive agricultural land to residential uses. Policies II.C. and II.D discourage both of these results.

- **Policy III.A.** Expansion of urban development into active agricultural areas outside of urban limits is to be discouraged, as long as infill development is available.

The City of Lompoc's Housing Element has identified available land within the city that is suitable for new residential infill development. (See the discussion in the Regional Housing Needs Allocation section, below.) Therefore, the proposed project does not appear to be consistent with Policy III.A.

Land Use Element

The County Comprehensive Plan Land Use Element includes the following regional goal intended to focus development:

Urbanization: In order for the County to sustain a healthy economy in the urbanized areas and to allow for growth within its resources and within its ability to pay for

necessary services, the County shall encourage infill, prevent scattered urban development, and encourage a balance between housing and jobs.

Annexation Areas A and B are contiguous to existing residential development. Therefore, the proposed project would not create “leapfrog” or scattered development separate from existing urbanized areas. However, the project does not promote infill on existing sites within the city. The proposed project would provide significant new housing, but new residents would have to commute relatively long distances (e.g., Santa Barbara, San Luis Obispo) to work and, as a result, the project does not encourage a balance between housing and jobs. (See 2040 RTP/SCS Section, below.) Therefore, the proposed project appears to be consistent with some, but not all, aspects of this Land Use Element goal.

The County Comprehensive Plan Land Use Element, Section V (Area/Community Goals) also contains the following land use goals for the Lompoc area:

The unique character of the area should be protected and enhanced with particular emphasis on protection of agricultural lands, grazing lands, and natural amenities.

Residential, commercial and industrial growth should be confined to urban areas.

Urbanization should remain within the City of Lompoc and designated urban portions of the Vandenberg Village/Mission Hills/Mesa Oaks areas.

Prime agricultural lands should be preserved for agricultural use only. Preservation of lesser grades of presently producing or potential agricultural land should be actively encouraged.

Both annexation areas are designated as Prime Farmland and used for agriculture. They are also designated as Rural. The proposed project would allow urbanization outside of the City of Lompoc and outside of designated Urban Areas. As a result, the proposed project does not appear to be consistent with these four Land Use Element Lompoc area goals.

Other Issues Considered

Demonstrated Housing Need

Additional housing is needed across the entire county. Between 2010 and 2040, the county-wide population is expected to increase by 23 percent (SBCAG Regional Growth Forecast, 2010-2040). The City is expected to add 5,631 new residents and 1,971 new households during the same timeframe.

The proposed project would develop two relatively large parcels. Up to 476 residential units could be constructed now on the 149-acre Burton Ranch site (Burton Ranch Specific Plan, February 2006). No other similarly large, vacant, residentially zoned parcels appear to exist within the City of Lompoc (based on a cursory survey of current aerial photography and the City's February 16, 2018, Zoning Map). However, there were 152 acres of vacant land (36 vacant parcels) zoned for low-density residential use as of September 2014 (City of Lompoc Final Housing Element Update, September 2014). Up to 564 residential units could be developed on those 36 vacant parcels.

Although the City's goals might be to provide housing at the proposed density and consisting of the type of housing stock that the proposed project would provide, more housing is also possible if the City rezoned lands within the existing City SOI to a higher density. Therefore, instead of two large residential developments, the City could permit smaller, but more numerous, housing projects within city boundaries to obtain the same number of new residences as proposed under this project.

Section 8 (Future Housing Needs) of the City of Lompoc's Housing Element states:

... the City has been assigned a total of 525 dwellings as its total RHNA goal. This target compares favorably to the hypothetical development capacity of 1,831 units above the current baseline... (Section 8.8, Page 113). [underline added for emphasis]

... the City has an adequate land inventory to address its projected housing needs. This means that no additional property must be rezoned or intensified in order to meet the City's assigned share of regional housing needs. (Section 8.1, Page 91). [underline added for emphasis]

The City of Lompoc's 2014-2022 RHNA totals 525 units, and their Housing Element land inventory shows they have the capacity to accommodate 1,831 dwelling units on vacant or underutilized sites. California Department of Housing and Community Development RHNA progress reports show the City has permitted 48 units as of the last annual progress report in 2017. California Department of Housing and Community Development RHNA progress reports show the City has permitted 48 units as of December 2017. According to the City's Housing Element, the City can accommodate 1,783 additional residences without rezoning or annexing new lands. However, if the City has additional information to demonstrate the need for this annexation, County staff encourages City staff to provide the information for further consideration of this matter.

2040 Regional Transportation Plan / Sustainable Communities Plan (RTP/SCS) Conformance

The Santa Barbara County Association of Governments (SBCAG) serves as the Regional Transportation Planning Agency (RTPA) for the County of Santa Barbara and is responsible for coordinating regional development in order to reduce greenhouse gas emissions and other transportation issues. The RTP/SCS' Goal 1 and Policy 1.1 state (in pertinent part):

Goal 1, ENVIRONMENT: Foster patterns of growth, development, and transportation that protect natural resources and lead to a healthy environment.

Policy 1.1 Land Use: The planning, construction, and operation of transportation facilities shall be coordinated with local land use planning and should encourage local agencies to:

- Make land use decisions that adequately address regional transportation issues and are consistent with the RTP-SCS.
- Promote a better balance of jobs and housing to reduce long-distance commuting by means of traditional land use zoning, infill development, and other, unconventional land use tools ...
- Preserve open space, agricultural land, and areas of special biological value.

Additionally, the City of Lompoc's General Plan Conservation and Open Space Element states:

Policy 9.1 The City shall participate in regional planning efforts with the SBCAG 2040 Regional Transportation Plan and the SBCAPCD to reduce basin-wide GHG emissions in compliance with AB 32 and SB 375.

The proposed project appears to conflict with Goal 1 and Policy 1.1 of the 2040 RTP/SCS Strategy because prime farmland would be converted to low-density residential housing. According to 2010 U.S. Census data, more than 11,000 residents of Lompoc commute out of the City for work, and therefore, the proposed low-density housing would exacerbate the existing jobs-housing imbalance between the Lompoc area and the rest of Santa Barbara County. The proposed project would not reduce long-distance commuting or provide transit-oriented development. The proposed project appears to conflict with the City's General Plan policy of cooperation with SBCAG plans and policies to reduce greenhouse gas emissions.

Environmental Review

The City of Lompoc General Plan Update Final Environmental Impact Report (EIR) (January 2010) serves as a programmatic EIR for the project area, with the Final EIR Addendum #3 (December 2016) serving as an additional programmatic level environmental analysis of the project sites.

The City of Lompoc General Plan Update Final EIR identifies Annexation Areas A and B as part of a Bailey Avenue "Expansion Area." The EIR identified significant and unavoidable impacts related to agricultural conversion of Annexation Areas A and B because of the loss of prime soils and important farmland. (See Impact LU-3 in the General Plan Update EIR, page ES-18.)

The City proposed to establish a Purchase of Agricultural Conservation Easements (PACE) program as mitigation for significant impacts to agricultural resources. On- or off-site agricultural conservation easements are to be purchased or established at a ratio of 1:1 (acreage conserved: acreage impacted). However, the General Plan Update EIR (as modified pursuant to the adopted Addenda to the EIR) states that agricultural impacts would remain significant and unavoidable (Page ES-18).

As discussed above, the City of Lompoc does not seem to have a demonstrated need for this annexation, as their Housing Element states that they have adequate capacity to meet their RHNA. Therefore, the impacts to agricultural resources involving the conversion of prime soils could be avoided by utilizing existing areas within the city to provide the needed housing.

Transportation and Greenhouse Gas Emissions

SB 743 - Vehicle Miles Travelled

The September 27, 2013, passage of Senate Bill (SB) 743 led the shift from Level of Service (LOS) roadway capacity measurements to Vehicle Miles Travelled (VMT). The LOS method primarily measures automobile congestion at intersections to measure project impacts. However, VMT is a more holistic assessment method and takes into account the total impacts from prioritization of certain transportation modes, project sites, and housing density. The traffic analysis prepared by the City for the SOI boundary change and annexation request (EIR

Addendum #3) only considers LOS. Due to the location and type of land use planned at this project site, VMT analysis, in accordance with SB 743, should be performed to understand the full range of potential transportation and circulation impacts.

County of Santa Barbara Energy and Climate Action Plan and Circulation Element

Emissions from transportation accounted for 38% of the County's 2016 greenhouse gas emissions. The County's 2015 Energy and Climate Action Plan (Page 4-11) goal is to reduce VMT (and thereby reduce greenhouse gas emissions) regionally:

Goal: Decrease the overall use of combustion engine vehicles and the number of single passenger vehicle trips.

- Transportation is the largest contributor of GHG emissions in the county. Transportation emissions can be reduced through three basic approaches:
 - c. Decreasing the amount of VMT.

The City of Lompoc and Annexation Areas A and B are located in a portion of Santa Barbara County that offers relatively limited employment opportunities. For example, 2015 US Census data show that 7,994 people are employed in the City Lompoc. However, 11,791 people that live in the City of Lompoc commute to work sites located in Santa Barbara, Santa Maria, and other communities.

The proposed project would add 469 households to the City of Lompoc, but it would not add new long-term employment opportunities. As a result, most new residents would likely commute to jobs in other communities. Consequently, the project would increase VMT and not improve the existing jobs-housing imbalance. These outcomes contrast with the County's Energy and Climate Action Plan goal of reducing VMT. Of course, this analysis may change if the City can provide alternative data to demonstrate new and expanding employment opportunities in the city and region.

Additionally, the County is embarking upon an update to the County Comprehensive Plan Circulation Element. A major goal of the project will be to reduce VMT within the county. The proposed conversion of agricultural land to low-density residential development would increase VMT and, therefore, the proposed project appears incompatible with the County's VMT and greenhouse gas emission reduction goals.

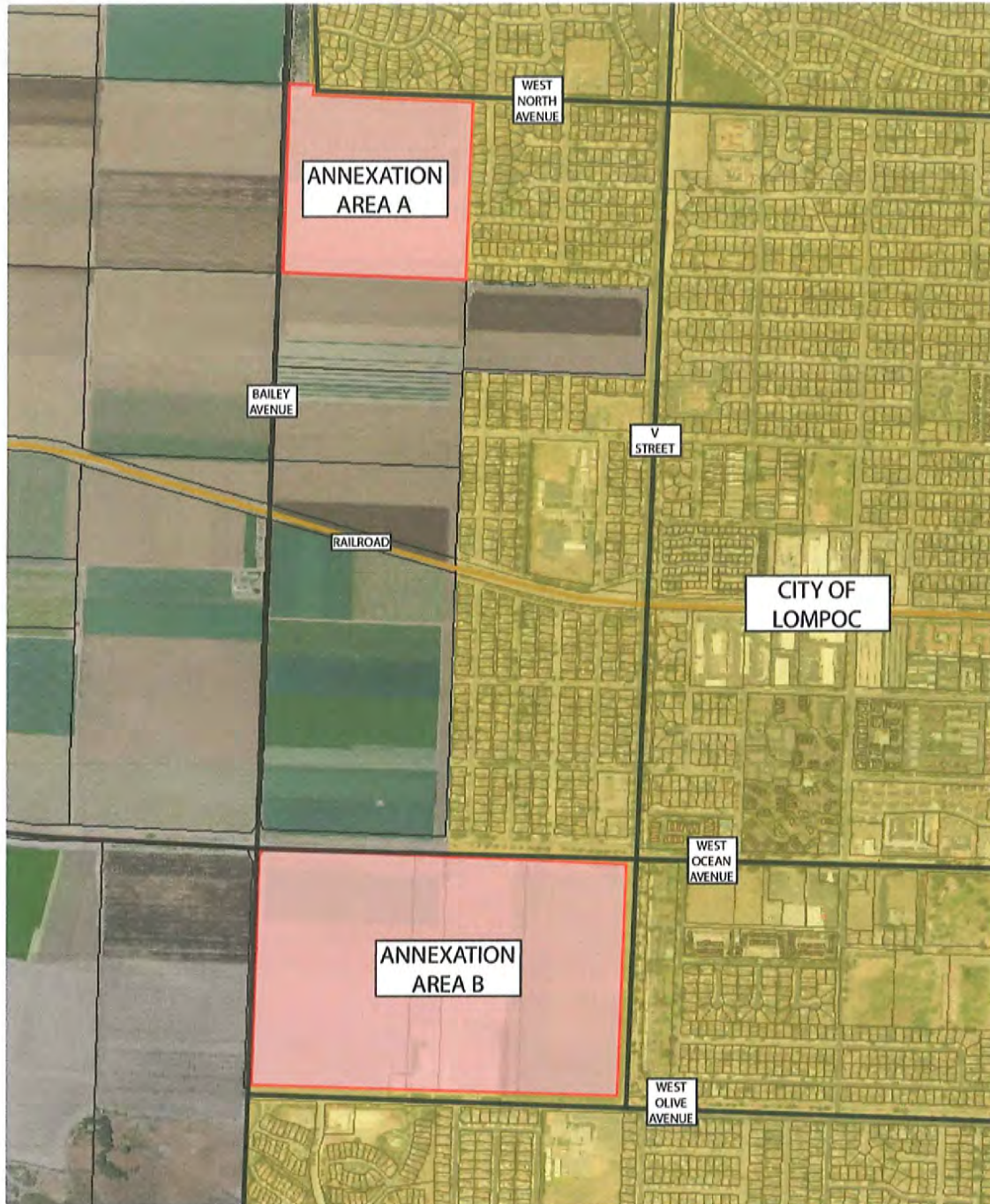
Conclusion

It appears that the proposed project would not comply with certain State, regional and local planning goals and policies; however, additional information might clarify the project description and demonstrate compliance with the goals and policies discussed above. More specifically, additional information is warranted regarding the following: (1) the demonstrated need for this project given the City's apparent capacity to accommodate its housing needs within the existing City SOI; and (2) how the project will reduce VMTs and, consequently, greenhouse gas emissions.

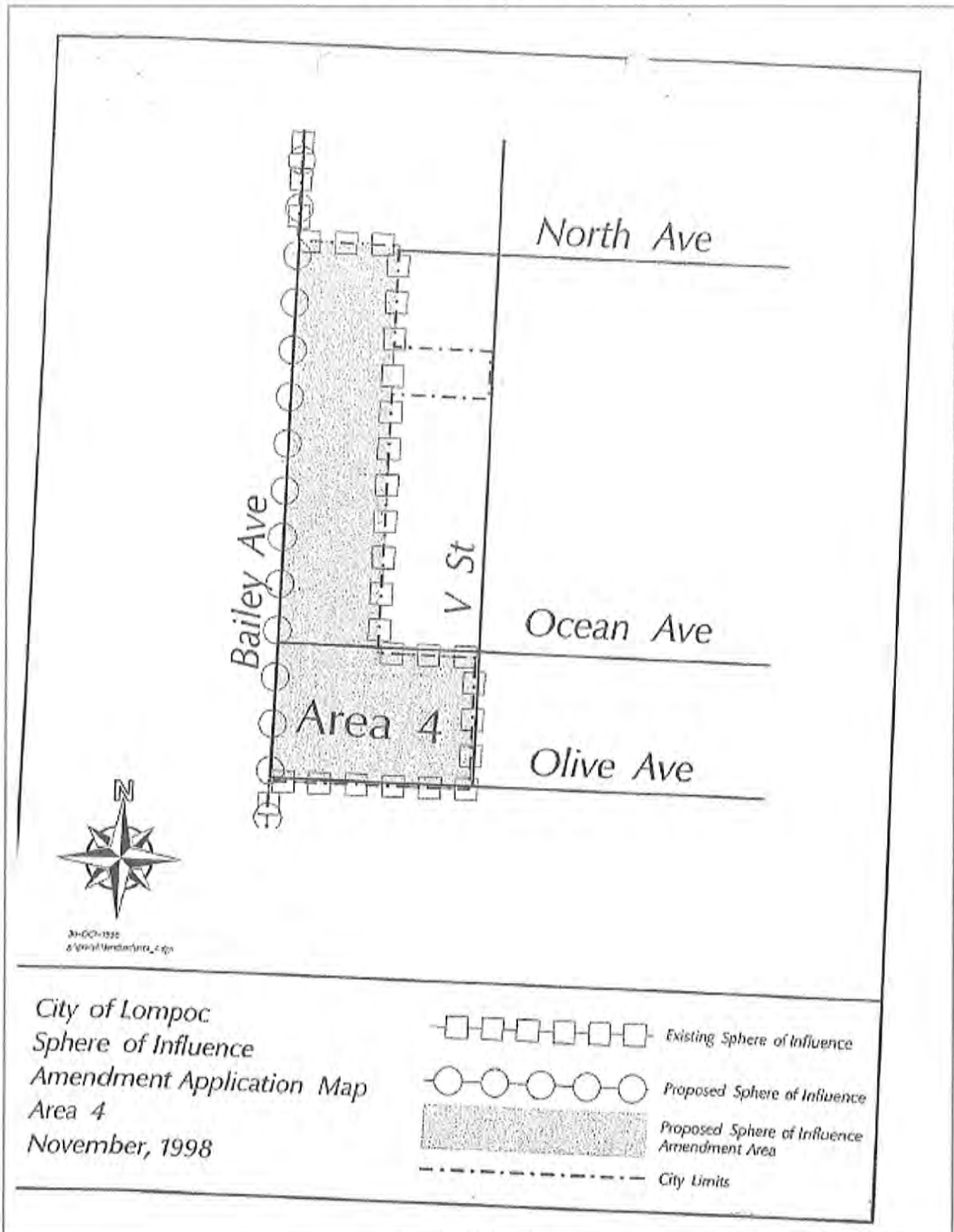
cc Jeff Frapwell, Assistant County Executive Officer, Santa Barbara County Executive Office
Dennis Bozanich, Deputy County Executive Officer, Santa Barbara County Executive Office
Dianne Black, Director, Planning and Development, County of Santa Barbara
Rachel Lipman, Fiscal and Policy Analyst, County Executive Office, County of Santa Barbara
Allen Bell, Supervising Planner, Planning and Development, County of Santa Barbara
Selena Evilsizor, Senior Planner, Planning and Development, County of Santa Barbara
Paul Hood, Executive Officer, Santa Barbara LAFCO
Jim Throop, City Manager, City of Lompoc
Teresa Gallavan, Assistant City Manager, City of Lompoc
Kevin McCune, Public Works Director, City of Lompoc
Brad Wilkie, Finance Director, City of Lompoc
Michael Luther, Assistant Public Works Director/City Engineer, City of Lompoc

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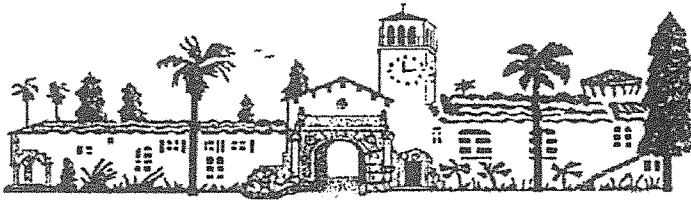
Attachment A: Annexation Area Context Map



Attachment B: City of Lompoc SOI Amendment Application Map to LAFCO in November 1998



ATTACHMENT 2



County of Santa Barbara Planning and Development

Lisa Plowman, Director

Jeff Wilson, Assistant Director

Steve Mason, Assistant Director

October 24, 2019

Mr. Brian Halvorson, Planning Manager
City of Lompoc
100 Civic Center Plaza
Lompoc, California 93436

Email: b_halvorson@ci.lompoc.ca.us

Re: City of Lompoc Bailey Avenue Sphere of Influence and Annexation Proposal, Planning and Development Response to City of Lompoc Response Letter

Dear Mr. Halvorson:

The purpose of this letter is to respond to your letter, dated August 26, 2019 (“Lompoc Letter”), in which you provided additional comments and requested a meeting regarding the City of Lompoc’s application to the Local Agency Formation Commission (LAFCO) for the proposed Bailey Avenue Sphere of Influence Change and Annexation. We appreciate the opportunity to provide additional comments and further clarify and support our original position on the proposal. This response letter reiterates the County’s policy positions, provides suggested actions that would address some of the issues raised in the City’s letter, and provides additional data and evidence to support the County’s policy positions, which were set forth in the County’s letter to you, dated September 28, 2018, and discussed at our meeting with you and LAFCO on October 1, 2018.

1. Previous Proposal

The current sphere of influence change and annexation proposal would convert a total of 135 acres of prime farmland in two separate areas along Bailey Avenue and construct 469 housing units consisting entirely of single-family dwellings. A similar, yet larger, Bailey Avenue area annexation proposal went before LAFCO in 1999 and was not approved. It is unclear how the present annexation proposal has changed to be consistent with County and LAFCO policies on preserving prime agriculture and open space and encouraging orderly urban development.

2. Agriculture and Agricultural Buffers

The County recognizes the City’s right and responsibility to establish land use policies governing agriculture and development. The intent of our September 28, 2018, was to inform the City and LAFCO how the annexation of a significant amount of prime agricultural land would be

inconsistent with agricultural resources protection policies adopted by the County. The County stands behind this policy consistency determination; indeed, many of the County's policies align with LAFCO's policies for the protection of agriculture and open space and—although the project does not have to comply with the County's policies—the project must comply with similar or identical LAFCO policies. For example, LAFCO's third policy "Encouraging Conservation of Prime Agricultural Lands and Open Space Areas," states that development shall be guided towards areas containing nonprime agricultural lands. In addition, LAFCO's first policy states that proposals that would conflict with the goals of maintaining agricultural lands in open space uses shall be discouraged. It appears that both County and LAFCO policies do not support the subject proposal because they discourage the conversion of agricultural lands, especially those with prime soils.

While the County does not support the sphere change and annexation, if the proposal moves forward, we would strongly advocate the use of agricultural buffers to minimize potential conflicts between agricultural and residential land uses. The proposed agricultural buffers would assist in minimizing land use conflict between the proposed residential development and some of the remaining agricultural lands in the County. Currently, it appears that these buffers are incomplete. Based on Attachment 6 to the City's response letter, it appears that these buffers are absent from the proposed annexation site on the northern boundary of Annexation Area B and southern boundary of Annexation Area A.

3. Housing

In general, the Lompoc Letter states that the purpose of the proposed sphere change and annexation is to provide additional housing, and that Lompoc is not meeting its Regional Housing Needs Allocation (RHNA). Additionally, the City states that property owners with lots zoned for high density housing are not submitting development proposals due to cost feasibility, and that it cannot build enough housing to meet its RHNA numbers through infill development alone. Our responses to this justification for the project are as follows.

Regional Housing Needs Allocation and Housing Capacity

The number of housing units assigned to Lompoc within the 2014-2022 Regional Housing Number Allocation (RHNA) Plan number is 525 housing units. According to Lompoc's Housing Element Annual Progress Report that captures progress through the end of 2018, the following percentages of housing units have been built for each of the income categories: 16.5% of very low, 3.5% of low, 44% of moderate, and 27% of above moderate housing for the 2014-2022 housing cycle.

There are abundant opportunities to provide housing within existing City limits that would protect prime farmland, reduce vehicle miles traveled (VMT), and meet the City's allocation and encourage housing that is consistent with land use policies. The City's 2014-2022 Housing Element stated approximately 1,800 units of housing capacity exists within the City, including approximately 1,100 entitled housing units. However, according to the Lompoc response letter, these entitled units, "are not anticipated to be built in the next 5+ years due to a number of market factors such as projects entitled during an inflated market (prior to recession), the potential need for costly redesign (to adjust to current market), and high utility infrastructure costs." The City's response letter also states that property owners and developers that own high-density zoned lots

are choosing not to pursue development proposals due to “market forces and cost feasibility of development.” The City could work with these property owners to address the issues that make their developments financially infeasible by creating development incentives (e.g., incentivize redesign, waive fees for permits or permit modifications, and/or work on minimizing utility costs). Further, it is not clear how the proposed annexation and housing development would produce housing that is different than these entitled lots and if these lots could be built in time to count for the current housing element cycle. In addition, the proposed annexation and housing development would likely do little to address the City’s RHNA categories with the lowest compliance percentages in the very low and low income categories. In a similar manner, the City could work with owners of high-density zoned lots and affordable housing providers to overcome cost feasibility barriers, to ensure that it meets the low and very low income RHNA categories. For example, increasing the allowed densities could stimulate development. To conclude, it appears that there are many opportunities to meet the housing needs of the City and its RHNA with existing infill development opportunities that avoid the need to convert prime farmland.

4. Jobs-Housing Imbalance

The County acknowledges that Lompoc is taking many steps to encourage employment opportunities that would address the jobs-housing imbalance. The jobs-to-housing ratio of 0.74 mentioned in the City’s response letter provided by the Santa Barbara County Association of Governments (SBCAG) is the same ratio cited in the Regional Housing Needs Allocation Plan dated July 2013. SBCAG’s 2019 Regional Growth Forecast 2050 projects Lompoc to grow by approximately 8,600 residents by 2050, a similar number as the City of Santa Barbara and about one quarter of the growth projected for Santa Maria. It also states that Lompoc’s projected housing capacity by 2050, based on modeling, is approximately 6,200 units, and its demand is projected to be approximately 4,500 units, leaving a surplus of approximately 1,700 housing units. Based on this analysis, it appears Lompoc will continue to have more housing stock than residents to fill it. Further, the County agrees that the statewide housing crisis is a critical problem that should involve all jurisdictions providing their share of housing. However, the State has also made reducing greenhouse gas emissions and vehicles miles traveled a priority. The US Census’ On the Map data portal provides data on the inflow and outflow of jobs for the City of Lompoc. (See Attachment 1.) Based on 2017 data, there appears to be twice as many residents who leave the City for work (12,424) as residents who work within the City (3,707) and non-residents who work in the City (3,793), combined. As a result, it appears more jobs are needed before additional housing units are justified.

5. Conclusion

To conclude, based on Planning and Development staff’s review of the proposal, the proposed sphere change and annexation are inconsistent with County and LAFCO policies intended to preserve agriculture. Opportunities to meet housing needs can be met by working with property owners of entitled and high-density zoned lands within the City to efficiently use viable development opportunities within existing City boundaries. The City can work with property owners to incentivize the development of entitled projects. Similarly, the City can work with owners of high-density zoned properties to incentivize the development of low-cost, high-density housing, where feasible. Additionally, the County understands significant efforts are being made

to encourage job growth in Lompoc. However, a substantial number of residents still commute to other areas for jobs. Developing housing units beyond its RHNA are likely to contribute to VMT and work against the goals set by SBCAG in its Regional Transportation Plan/Sustainable Communities Strategy and the County in its Energy and Climate Action Plan.

Thank you for the opportunity to provide comments on the response letter. If you have any questions or require further information, please contact me at (805) 568-2086 or Dan Klemann at (805) 568-2072.

Regards,



Lisa Plowman, Director
Planning & Development Department

Attachment 1: On the Map Inflow/Outflow for Primary Jobs City of Lompoc, U.S. Census Bureau

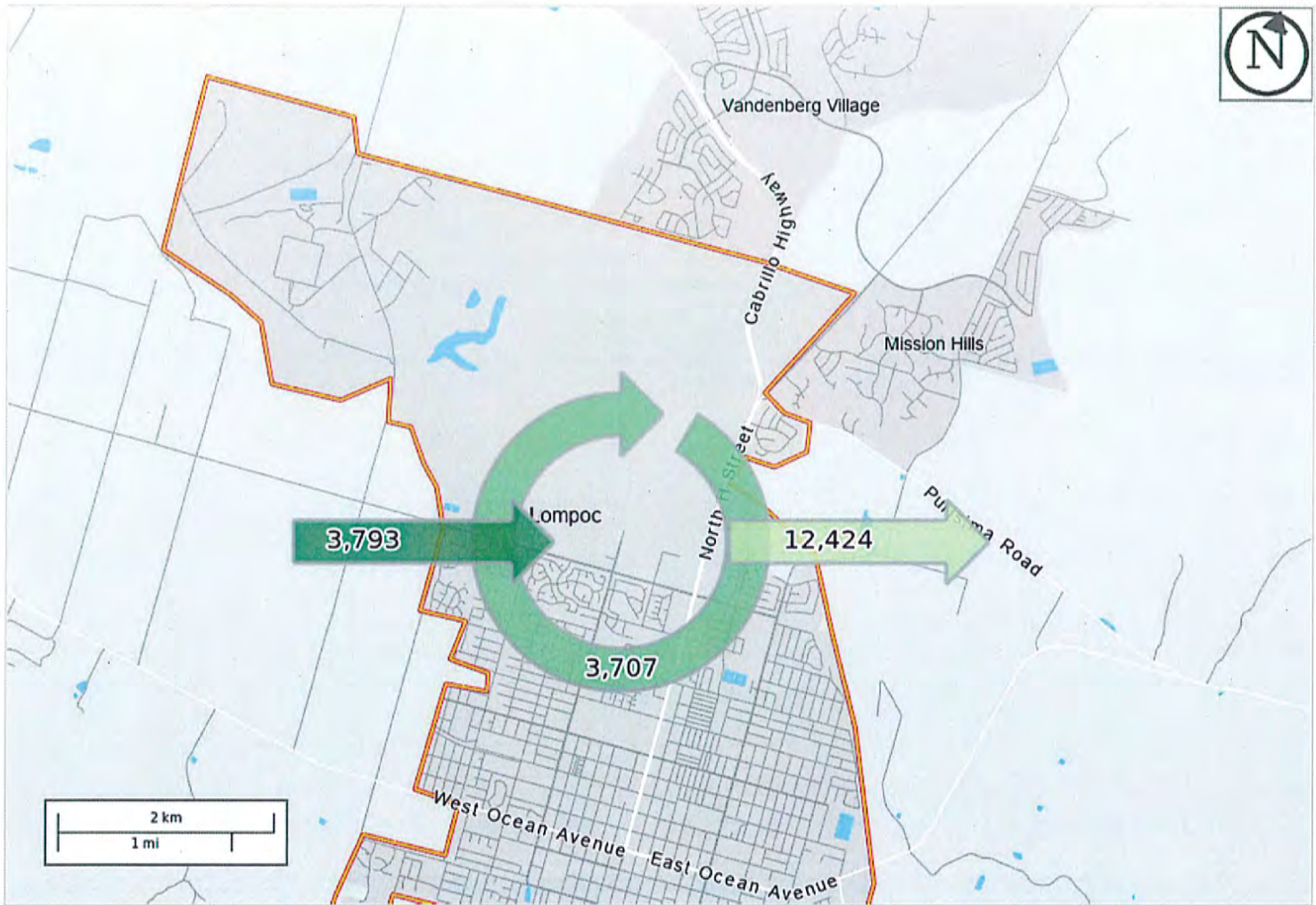
c: Paul Hood, Santa Barbara County LAFCO
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Lisa Plowman, Director, Planning and Development, County of Santa Barbara
Rachel Lipman, Fiscal and Policy Analyst, County Executive Office, County of Santa Barbara
Santa Barbara County Agricultural Commissioner's Office
File

Inflow/Outflow Report

Primary Jobs for All Workers in 2017

Created by the U.S. Census Bureau's OnTheMap <https://onthemap.ces.census.gov> on 10/16/2019

Inflow/Outflow Counts of Primary Jobs for Selection Area in 2017 All Workers



Map Legend

Selection Areas

- Analysis Selection

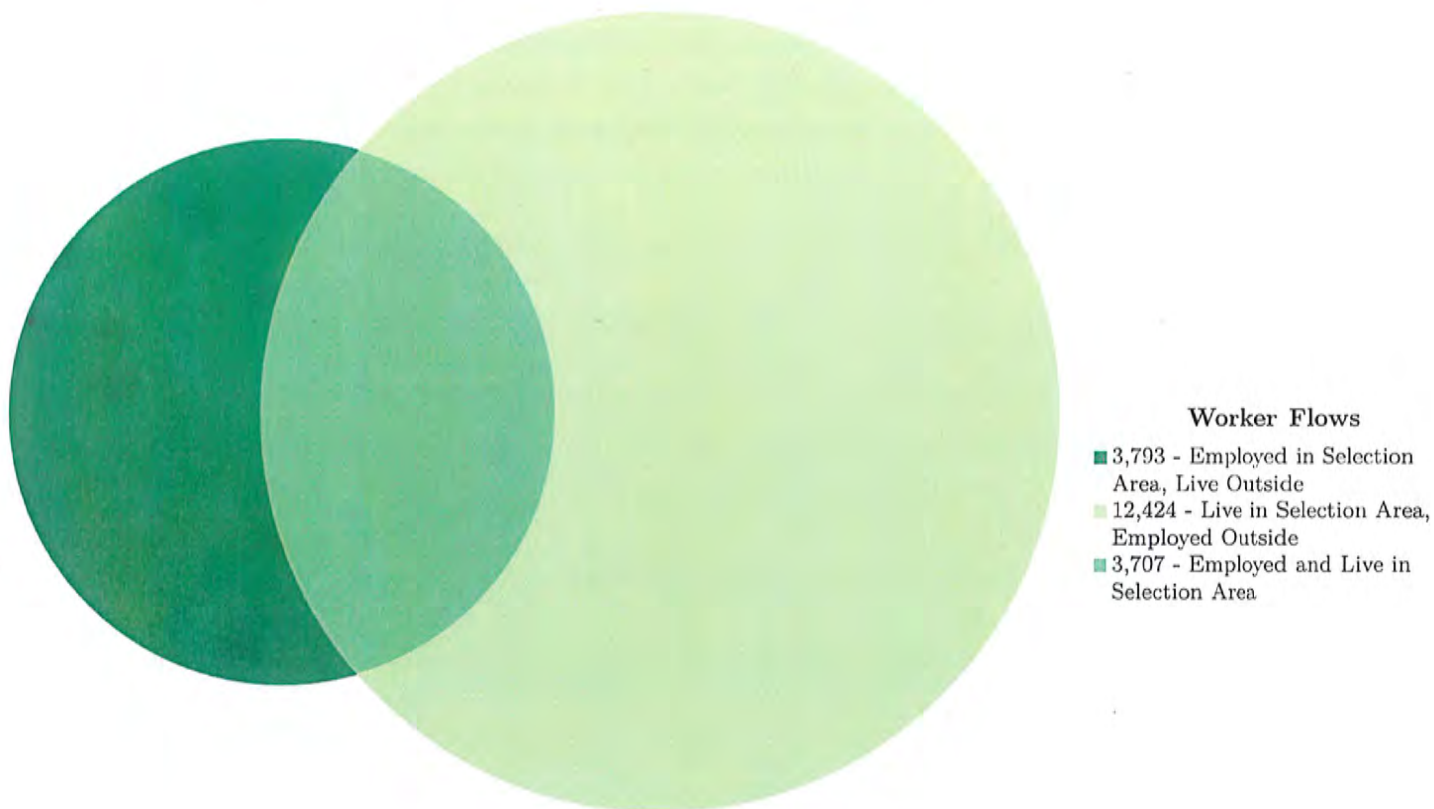
Inflow/Outflow

- Employed and Live in Selection Area
 - Employed in Selection Area, Live Outside
 - Live in Selection Area, Employed Outside
- Note: Overlay arrows do not indicate directionality of worker flow between home and employment locations.



Inflow/Outflow Counts of Primary Jobs for Selection Area in 2017

All Workers



Inflow/Outflow Counts of Primary Jobs for Selection Area in 2017

All Workers

Worker Totals and Flows	2017	
	Count	Share
Employed in the Selection Area	7,500	100.0
Employed in the Selection Area but Living Outside	3,793	50.6
Employed and Living in the Selection Area	3,707	49.4
Living in the Selection Area	16,131	100.0
Living in the Selection Area but Employed Outside	12,424	77.0
Living and Employed in the Selection Area	3,707	23.0

Additional Information

Analysis Settings

Analysis Type	Inflow/Outflow
Selection area as	N/A
Year(s)	2017
Job Type	Primary Jobs
Selection Area	Selection Area Freehand Drawing
Selected Census Blocks	946
Analysis Generation Date	10/16/2019 15:10 - OnTheMap 6.6
Code Revision	d7f8a300c9f4e458f61bc73d3099ca2cb8f8feaa
LODES Data Version	20170818

Data Sources

Source: U.S. Census Bureau, OnTheMap Application and LEHD Origin-Destination Employment Statistics (Beginning of Quarter Employment, 2nd Quarter of 2002-2017).

Notes

1. Race, Ethnicity, Educational Attainment, and Sex statistics are beta release results and are not available before 2009.
2. Educational Attainment is only produced for workers aged 30 and over.
3. Firm Age and Firm Size statistics are beta release results for All Private jobs and are not available before 2011.
4. Data on Federal employment are not available after 2015.

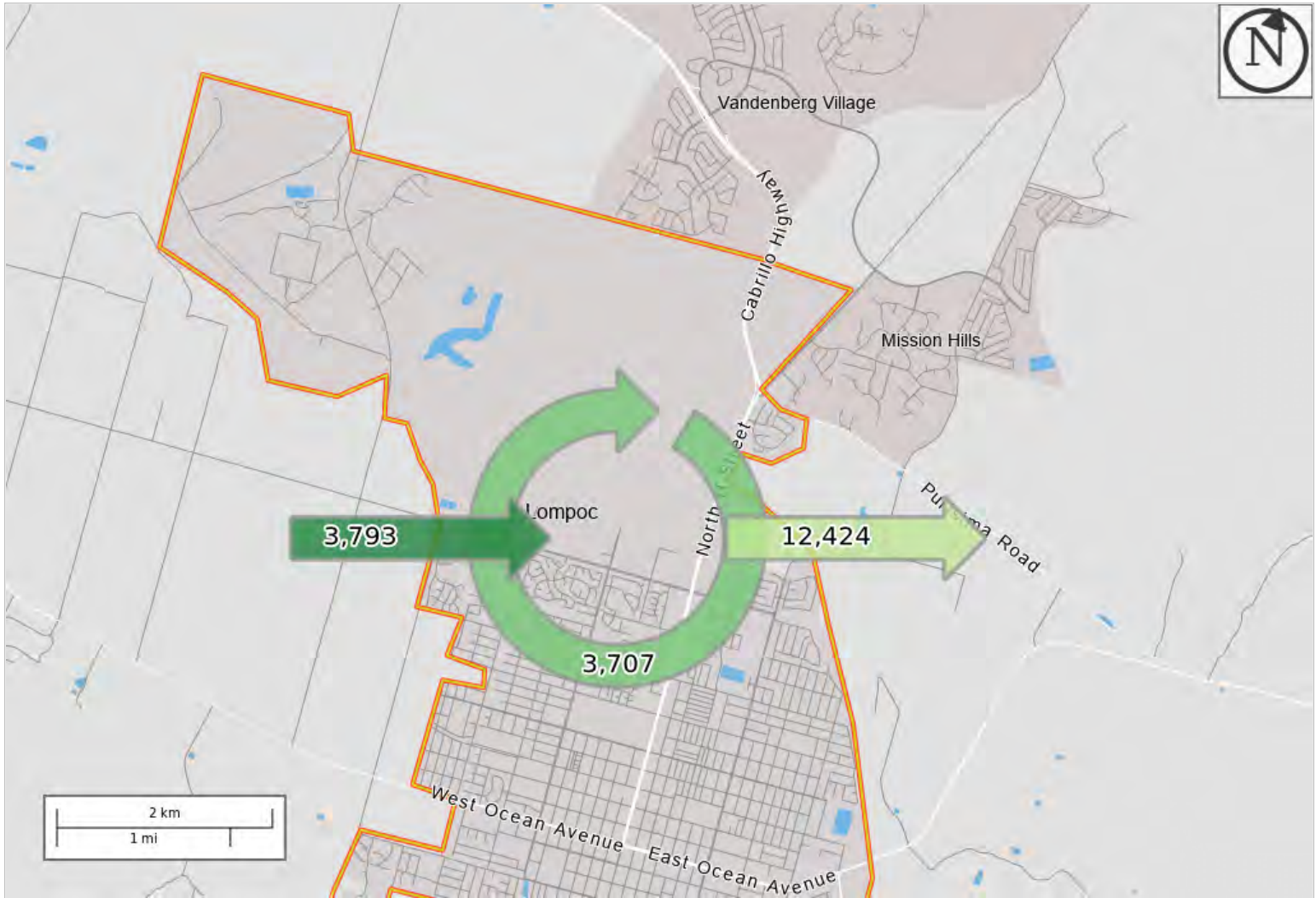
Inflow/Outflow Report

Primary Jobs for All Workers in 2017

Created by the U.S. Census Bureau's OnTheMap <https://onthemap.ces.census.gov> on 10/16/2019

Inflow/Outflow Counts of Primary Jobs for Selection Area in 2017

All Workers



Map Legend

Selection Areas

- Analysis Selection

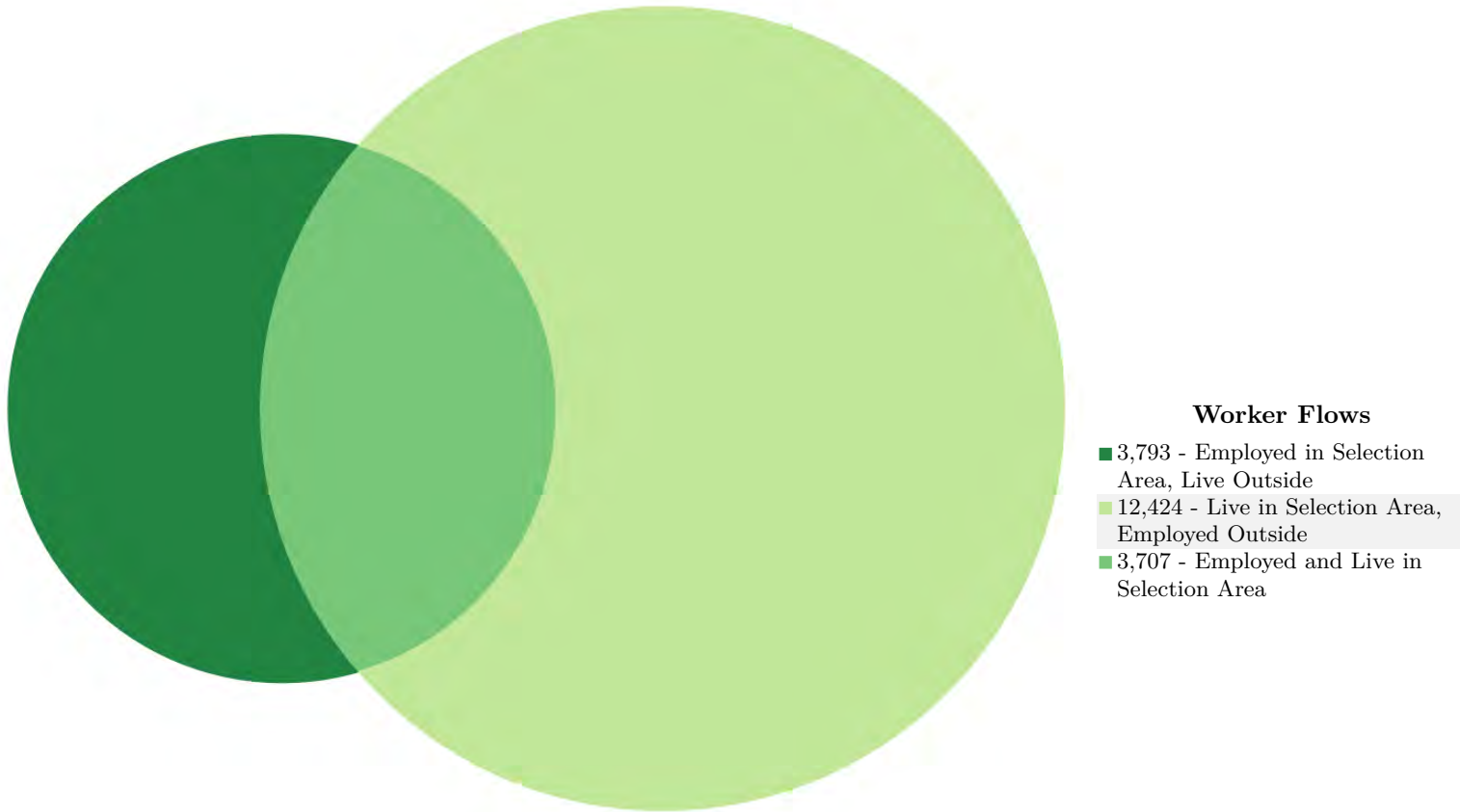
Inflow/Outflow

- Employed and Live in Selection Area
 - Employed in Selection Area, Live Outside
 - Live in Selection Area, Employed Outside
- Note: Overlay arrows do not indicate directionality of worker flow between home and employment locations.



Inflow/Outflow Counts of Primary Jobs for Selection Area in 2017

All Workers



Inflow/Outflow Counts of Primary Jobs for Selection Area in 2017

All Workers

Worker Totals and Flows	2017	
	Count	Share
Employed in the Selection Area	7,500	100.0
Employed in the Selection Area but Living Outside	3,793	50.6
Employed and Living in the Selection Area	3,707	49.4
Living in the Selection Area	16,131	100.0
Living in the Selection Area but Employed Outside	12,424	77.0
Living and Employed in the Selection Area	3,707	23.0

Additional Information

Analysis Settings

Analysis Type	Inflow/Outflow
Selection area as	N/A
Year(s)	2017
Job Type	Primary Jobs
Selection Area	Selection Area Freehand Drawing
Selected Census Blocks	946
Analysis Generation Date	10/16/2019 15:10 - OnTheMap 6.6
Code Revision	d7f8a300c9f4e458f61bc73d3099ca2cb8f8feaa
LODES Data Version	20170818

Data Sources

Source: U.S. Census Bureau, OnTheMap Application and LEHD Origin-Destination Employment Statistics (Beginning of Quarter Employment, 2nd Quarter of 2002-2017).

Notes

1. Race, Ethnicity, Educational Attainment, and Sex statistics are beta release results and are not available before 2009.
2. Educational Attainment is only produced for workers aged 30 and over.
3. Firm Age and Firm Size statistics are beta release results for All Private jobs and are not available before 2011.
4. Data on Federal employment are not available after 2015.

ATTACHMENT 3



County of Santa Barbara Planning and Development

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

November 26, 2019

Mr. Paul Hood, Executive Officer
Santa Barbara Local Agency Formation Commission
105 East Anapamu Street, Room 407
Santa Barbara, California 93101

Email: lafco@sblafco.org

Re: City of Lompoc Bailey Avenue Sphere of Influence and Annexation Proposal

Dear Mr. Hood:

The purpose of this letter is to present the County's policy conflicts and concerns regarding the City of Lompoc's (City's) proposed Bailey Avenue Sphere of Influence (SOI) change and Annexation. (Figure 1).

The County has outlined the policy issues in previous letters addressed to the City in response to the City's SOI change and annexation proposal, dated September 28, 2018, and October 24, 2019, respectively (Attachment 1 and 2). A brief summary of these issues is provided below.

1. Agriculture

The current sphere of influence change and annexation proposal would convert a total of 135 acres of prime agricultural land to residential uses in two separate areas along Bailey Avenue. The conversion of a significant amount of prime agricultural land would be inconsistent with agricultural resources protection policies adopted by the County in the Comprehensive Plan. In addition, the County's policies align with the Local Agency Formation Commission's (LAFCO's) policies for the protection of agriculture and open space. LAFCO's policies specifically guide development toward nonprime agricultural land and discourage proposals that would conflict with the goals of maintaining agricultural lands in open space uses.

2. Housing

The City of Lompoc's position is that the proposed sphere change and annexation will provide additional needed housing, and that Lompoc is not meeting its Regional Housing Needs Allocation (RHNA). Additionally, the City has stated that property owners with lots zoned for high density housing are not submitting development proposals due to cost feasibility, and that it cannot build enough housing to meet its RHNA numbers through infill development alone. In the County's response letter, the County suggested the City work with property owners to incentivize the

development of stalled entitled projects, and work with owners of high density-zoned properties to incentivize the development of low-cost, high-density housing, within existing City boundaries. Lastly, the approved Burton Ranch and River Terrace developments will bring over 700 new residential units to the City once they are developed.

3. Jobs-Housing Imbalance and VMT

The County and other jurisdictions in the region are developing policies and implementing measures to reduce Vehicles Miles Traveled (VMT), consistent with State mandates to reduce VMT. Land use decisions and transportation planning that reduce VMT are primary goals set forth in the County's Energy and Climate Action Plan and is a regional goal outlined in the Santa Barbara County Association of Government's (SBCAG) Regional Transportation Plan and Sustainable Communities Strategy. Based on U.S. Census and other survey data, a substantial number of Lompoc residents still commute to other areas for jobs. The SOI change and annexation proposal would result in development beyond the City's housing needs based on the number of jobs in the area and therefore would work against the goals set by the State, County, and SBCAG, by exacerbating VMT.

4. Conclusion

Based on Planning and Development staff's review of the proposal, the Department believes that the proposed sphere change and annexation's conversion of prime agricultural land to residential uses is inconsistent with County and LAFCO policies. In addition, the proposed housing cannot be justified by the City's RHNA as there are approximately 1,100 entitled units that can be developed to support the City's housing needs. Finally, the proposed single-family residential development in an area that lacks sufficient job opportunities risks increasing VMT and is antithetical to the goals and policies developed to reduce it.

If you have any questions or require further information, please contact me at (805) 568-2086 or Dan Klemann at (805) 568-2072.

Regards,



Lisa Plowman, Director
Planning & Development Department

Attachment 1: County Comment Letter on City of Lompoc Bailed Avenue Proposal, dated September 28, 2018

Attachment 2: County Response Letter to Lompoc Comment Response Letter, dated October 24, 2019

c: Paul Hood, Santa Barbara County LAFCO
Dan Klemann, Deputy Director, Long Range Planning Division
Whitney Wilkinson, Senior Planner, Planning and Development Department
City of Lompoc Mayor and City Council

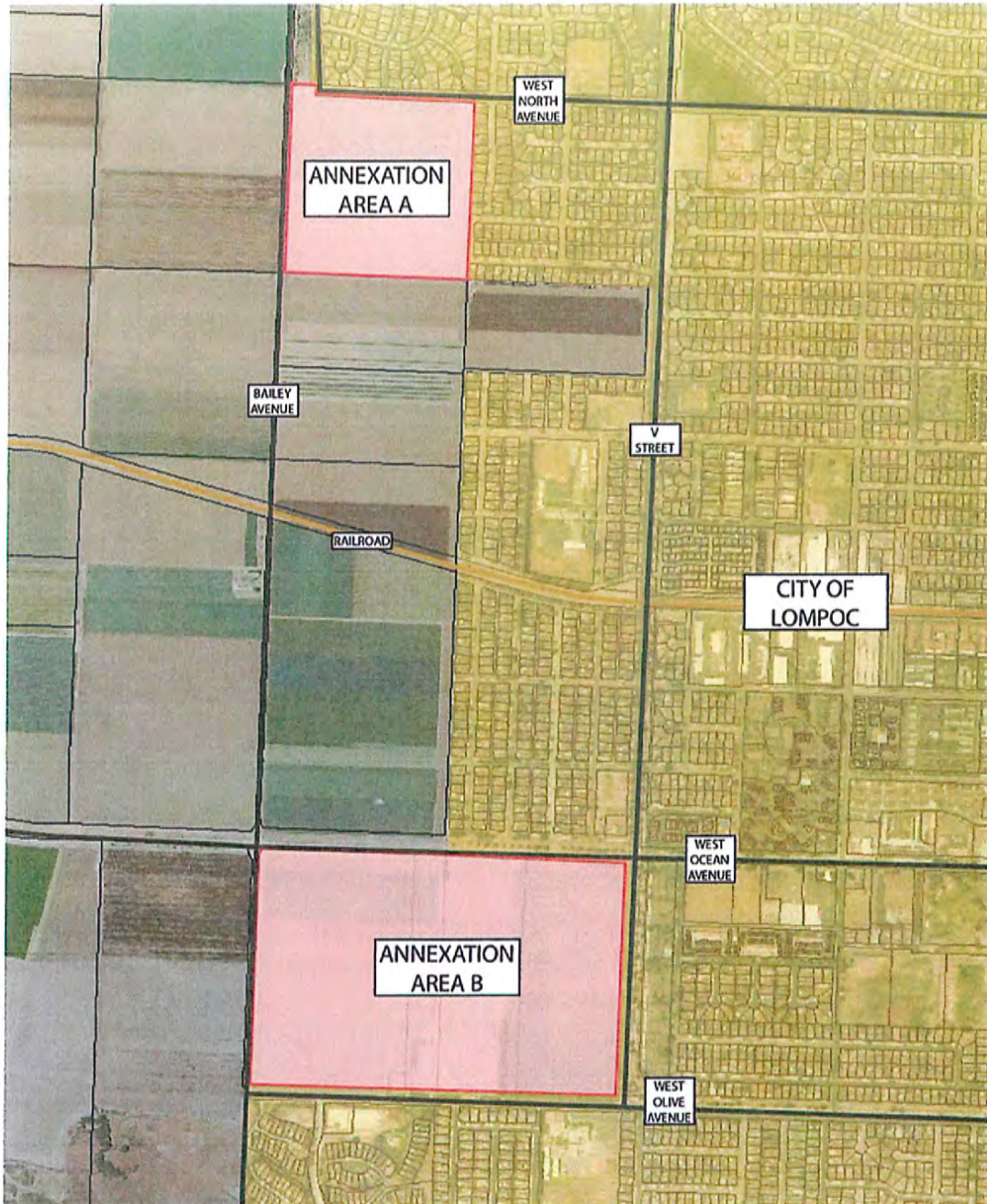
Mr. Paul Hood
November 26, 2019
Page 3 of 3

Jim Throop, City Manager, City of Lompoc
Brad Wilkie, Utilities Director, City of Lompoc
Michael Luther, Public Works Director, City of Lompoc
Christie Alarcon, Community Development Director
Dean Albro, Management Services Director, City of Lompoc
Dennis Bozanich, Deputy County Executive Officer, Santa Barbara County Executive
Office
Lisa Plowman, Director, Planning and Development, County of Santa Barbara
Rachel Lipman, Fiscal and Policy Analyst, County Executive Office, County of Santa
Barbara
Santa Barbara County Agricultural Commissioner's Office
File

FIGURE 1.

City of Lompoc Bailey Avenue SOI and Annexation Proposal
Long Range Planning Division Preliminary Analysis
September 28, 2018
Page 9 of 10

Attachment A: Annexation Area Context Map



Attachment 1



COUNTY OF SANTA BARBARA
PLANNING AND DEVELOPMENT
LONG RANGE PLANNING
MEMORANDUM

Date: September 28, 2018

To: Brian Halvorson, Planning Manager
City of Lompoc

From: Dan Klemann, Deputy Director ✱
Long Range Planning Division

Subject: City of Lompoc Bailey Avenue Sphere of Influence and Annexation Proposal,
Long Range Planning Division Informal Review – Preliminary Comments

Long Range Planning Division staff prepared the following preliminary comments on the City of Lompoc's Bailey Avenue Sphere of Influence and Annexation Proposal at your request to help facilitate our upcoming meeting on October 1, 2018. Our preliminary comments are based upon the City's "Bailey Avenue Annexation Fiscal Impact Analysis" report (June 2017). At this time, the City has not submitted a formal application for the proposed project to the Santa Barbara Local Agency Formation Commission (LAFCO). The County will provide an official, comprehensive review of the proposed project after the City submits an application to LAFCO. In the meantime, Long Range Planning Division staff welcomes any new information the City wishes to provide that further clarifies the project description and/or might alter the preliminary comments in this memorandum.

Subject Properties

Annexation Area A (Bailey Property): APN 093-070-065, (No Address) W. North Avenue.

Annexation Area B (Bodger Property): APN 093-111-007, 1859 W. Olive Avenue; APN 093-111-008, No Address W. Olive Avenue; APN 093-111-009, 1851 W. Olive Ave; APN 093-111-010, (No Address) W. Olive Avenue; APN 093-111-011, 1851 W. Olive Ave; APN 093-111-012, (No Address) W. Olive Avenue.

Site Description

Annexation Area A is a 37.74-acre assessor's parcel in unincorporated Santa Barbara County. The parcel is designated as Rural and Agricultural Commercial in the County Comprehensive Plan [Land Use Map](#) and designated as AG-II-100 (minimum gross lot area of 100 acres) in the Land Use and Development Code (LUDC) [Zoning Map](#). The parcel currently supports irrigated crops, contains no structures, and the north and east sides of the parcel adjoin the City of Lompoc's SOI. The parcel is adjoined by single-family residential development to the north and east, and agricultural land to the south and west. (See Attachment A.)

Annexation Area B consists of six contiguous assessor's parcels totaling 97.51 acres in unincorporated Santa Barbara County. The parcels are all designated as Rural and AG-II in the County Comprehensive Plan [Land Use Map](#) and AG-II-40 (minimum gross lot area of 40 acres) in the LUDC [Zoning Map](#). The current land uses on the parcels include flowers, irrigated field crops, maintenance facilities, storage sheds, greenhouses, and residences. The parcels are bordered to the west and northeast by agricultural land, and residential development to the northeast, east, and south. (See Attachment A.)

The California Department of Conservation map of the [Santa Barbara County Important Farmland 2016](#) designates both annexation areas as Prime Farmland. Together the annexation areas comprise approximately 0.2% of the approximately 66,969 acres of Prime Farmland in Santa Barbara County (2016 Important Farmland data, California Department of Conservation). The parcels are not currently subject to a Williamson Act agricultural preserve contract.

The City has not provided any documentation regarding the legal status of the subject parcels. The application to LAFCO should demonstrate how many legal lots exist within Areas A and B.

Proposed Project

The proposed project expands the City's SOI to include Areas A and B and annexes both areas to the City of Lompoc. The City then intends to process a general plan amendment and rezone for both areas to allow for subdivision and subsequent residential development. Specifically, the City would rezone Area A to permit 87 single-family units on 32.1 acres, with the remaining 4.2 acres as an open space/agricultural buffer. The City would rezone Annexation Area B to permit 382 single-family units on 86.2 acres, with the remaining 9.7 acres as an open space/agricultural buffer.

LAFCO Project History

The City of Lompoc submitted an application to LAFCO for a SOI amendment in November 1998. The application included the 272-acre "Bailey Avenue Corridor" as one of four proposed SOI expansion areas. The Bailey Avenue Corridor included Annexation Areas A and B as well as the properties between Annexation Areas A and B, which totaled approximately 138 acres. (See Attachment B.)

LAFCO staff recommended that LAFCO deny the inclusion of the Bailey Avenue Corridor within the City's SOI in its December 2, 1998, report to LAFCO. LAFCO staff cited sections 56377 and 56300 of the California Government Code that guide development away from prime agricultural land, and toward existing vacant or nonprime agricultural lands that exist within the jurisdiction of a local agency. LAFCO subsequently denied the City's request to include the Bailey Avenue Corridor in the City's SOI on March 11, 1999.

Preliminary Policy Consistency

Relevant County Comprehensive Plan policies are presented below, with a policy consistency analysis following each topic. Although the project would provide certain benefits to the City of Lompoc (e.g., increased housing stock and increased property tax revenue), staff's preliminary analysis revealed that the proposed project appears to be inconsistent with the policies set forth below. Related topics follow this policy consistency section.

Agricultural Element

The County Comprehensive Plan Agricultural Element includes the following goals and policies intended to conserve and protect agricultural resources:

- **GOAL I.** Santa Barbara County shall assure and enhance the continuation of agriculture as a major viable production industry in Santa Barbara County. Agriculture shall be encouraged. Where conditions allow, (taking into account environmental impacts) expansion and intensification shall be supported.
 - **Policy I.F.** The quality and availability of water, air, and soil resources shall be protected through provisions including but not limited to, the stability of Urban/Rural Boundary Lines, maintenance of buffer areas around agricultural areas, and the promotion of conservation practices.

The proposed project would establish buffers between new residential development and adjacent agricultural areas. However, it would also alter the Urban/Rural boundary and convert soil and agricultural land to residential uses. Therefore, the proposed project appears to be consistent with one, but not all, aspects of Policy I.F.

- **GOAL II.** Agricultural lands shall be protected from adverse urban influence.
 - **Policy II.C.** Santa Barbara County shall discourage the extension by the Local Agency Formation Commission (LAFCO) of urban spheres of influence into productive agricultural lands designated Agriculture II (A-II) or Commercial Agriculture (AC) under the Comprehensive Plan.
 - **Policy II.D.** Conversion of highly productive agricultural lands, whether urban or rural, shall be discouraged. The County shall support programs which encourage the retention of highly productive agricultural lands.

The SOI boundary change and annexation would extend the City's SOI into agricultural lands and convert approximately 135 acres of productive agricultural land to residential uses. Policies II.C. and II.D discourage both of these results.

- **Policy III.A.** Expansion of urban development into active agricultural areas outside of urban limits is to be discouraged, as long as infill development is available.

The City of Lompoc's Housing Element has identified available land within the city that is suitable for new residential infill development. (See the discussion in the Regional Housing Needs Allocation section, below.) Therefore, the proposed project does not appear to be consistent with Policy III.A.

Land Use Element

The County Comprehensive Plan Land Use Element includes the following regional goal intended to focus development:

Urbanization: In order for the County to sustain a healthy economy in the urbanized areas and to allow for growth within its resources and within its ability to pay for

necessary services, the County shall encourage infill, prevent scattered urban development, and encourage a balance between housing and jobs.

Annexation Areas A and B are contiguous to existing residential development. Therefore, the proposed project would not create "leapfrog" or scattered development separate from existing urbanized areas. However, the project does not promote infill on existing sites within the city. The proposed project would provide significant new housing, but new residents would have to commute relatively long distances (e.g., Santa Barbara, San Luis Obispo) to work and, as a result, the project does not encourage a balance between housing and jobs. (See 2040 RTP/SCS Section, below.) Therefore, the proposed project appears to be consistent with some, but not all, aspects of this Land Use Element goal.

The County Comprehensive Plan Land Use Element, Section V (Area/Community Goals) also contains the following land use goals for the Lompoc area:

The unique character of the area should be protected and enhanced with particular emphasis on protection of agricultural lands, grazing lands, and natural amenities.

Residential, commercial and industrial growth should be confined to urban areas.

Urbanization should remain within the City of Lompoc and designated urban portions of the Vandenberg Village/Mission Hills/Mesa Oaks areas.

Prime agricultural lands should be preserved for agricultural use only. Preservation of lesser grades of presently producing or potential agricultural land should be actively encouraged.

Both annexation areas are designated as Prime Farmland and used for agriculture. They are also designated as Rural. The proposed project would allow urbanization outside of the City of Lompoc and outside of designated Urban Areas. As a result, the proposed project does not appear to be consistent with these four Land Use Element Lompoc area goals.

Other Issues Considered

Demonstrated Housing Need

Additional housing is needed across the entire county. Between 2010 and 2040, the county-wide population is expected to increase by 23 percent (SBCAG Regional Growth Forecast, 2010-2040). The City is expected to add 5,631 new residents and 1,971 new households during the same timeframe.

The proposed project would develop two relatively large parcels. Up to 476 residential units could be constructed now on the 149-acre Burton Ranch site (Burton Ranch Specific Plan, February 2006). No other similarly large, vacant, residentially zoned parcels appear to exist within the City of Lompoc (based on a cursory survey of current aerial photography and the City's February 16, 2018, Zoning Map). However, there were 152 acres of vacant land (36 vacant parcels) zoned for low-density residential use as of September 2014 (City of Lompoc Final Housing Element Update, September 2014). Up to 564 residential units could be developed on those 36 vacant parcels.

Although the City's goals might be to provide housing at the proposed density and consisting of the type of housing stock that the proposed project would provide, more housing is also possible if the City rezoned lands within the existing City SOI to a higher density. Therefore, instead of two large residential developments, the City could permit smaller, but more numerous, housing projects within city boundaries to obtain the same number of new residences as proposed under this project.

Section 8 (Future Housing Needs) of the City of Lompoc's Housing Element states:

... the City has been assigned a total of 525 dwellings as its total RHNA goal. This target compares favorably to the hypothetical development capacity of 1,831 units above the current baseline... (Section 8.8, Page 113). [underline added for emphasis]

... the City has an adequate land inventory to address its projected housing needs. This means that no additional property must be rezoned or intensified in order to meet the City's assigned share of regional housing needs. (Section 8.1, Page 91). [underline added for emphasis]

The City of Lompoc's 2014-2022 RHNA totals 525 units, and their Housing Element land inventory shows they have the capacity to accommodate 1,831 dwelling units on vacant or underutilized sites. California Department of Housing and Community Development RHNA progress reports show the City has permitted 48 units as of the last annual progress report in 2017. California Department of Housing and Community Development RHNA progress reports show the City has permitted 48 units as of December 2017. According to the City's Housing Element, the City can accommodate 1,783 additional residences without rezoning or annexing new lands. However, if the City has additional information to demonstrate the need for this annexation, County staff encourages City staff to provide the information for further consideration of this matter.

2040 Regional Transportation Plan / Sustainable Communities Plan (RTP/SCS) Conformance

The Santa Barbara County Association of Governments (SBCAG) serves as the Regional Transportation Planning Agency (RTPA) for the County of Santa Barbara and is responsible for coordinating regional development in order to reduce greenhouse gas emissions and other transportation issues. The RTP/SCS' Goal 1 and Policy 1.1 state (in pertinent part):

Goal 1, ENVIRONMENT: Foster patterns of growth, development, and transportation that protect natural resources and lead to a healthy environment.

Policy 1.1 Land Use: The planning, construction, and operation of transportation facilities shall be coordinated with local land use planning and should encourage local agencies to:

- Make land use decisions that adequately address regional transportation issues and are consistent with the RTP-SCS.
- Promote a better balance of jobs and housing to reduce long-distance commuting by means of traditional land use zoning, infill development, and other, unconventional land use tools ...
- Preserve open space, agricultural land, and areas of special biological value.

Additionally, the City of Lompoc's General Plan Conservation and Open Space Element states:

Policy 9.1 The City shall participate in regional planning efforts with the SBCAG 2040 Regional Transportation Plan and the SBCAPCD to reduce basin-wide GHG emissions in compliance with AB 32 and SB 375.

The proposed project appears to conflict with Goal 1 and Policy 1.1 of the 2040 RTP/SCS Strategy because prime farmland would be converted to low-density residential housing. According to 2010 U.S. Census data, more than 11,000 residents of Lompoc commute out of the City for work, and therefore, the proposed low-density housing would exacerbate the existing jobs-housing imbalance between the Lompoc area and the rest of Santa Barbara County. The proposed project would not reduce long-distance commuting or provide transit-oriented development. The proposed project appears to conflict with the City's General Plan policy of cooperation with SBCAG plans and policies to reduce greenhouse gas emissions.

Environmental Review

The City of Lompoc General Plan Update Final Environmental Impact Report (EIR) (January 2010) serves as a programmatic EIR for the project area, with the Final EIR Addendum #3 (December 2016) serving as an additional programmatic level environmental analysis of the project sites.

The City of Lompoc General Plan Update Final EIR identifies Annexation Areas A and B as part of a Bailey Avenue "Expansion Area." The EIR identified significant and unavoidable impacts related to agricultural conversion of Annexation Areas A and B because of the loss of prime soils and important farmland. (See Impact LU-3 in the General Plan Update EIR, page ES-18.)

The City proposed to establish a Purchase of Agricultural Conservation Easements (PACE) program as mitigation for significant impacts to agricultural resources. On- or off-site agricultural conservation easements are to be purchased or established at a ratio of 1:1 (acreage conserved: acreage impacted). However, the General Plan Update EIR (as modified pursuant to the adopted Addenda to the EIR) states that agricultural impacts would remain significant and unavoidable (Page ES-18).

As discussed above, the City of Lompoc does not seem to have a demonstrated need for this annexation, as their Housing Element states that they have adequate capacity to meet their RHNA. Therefore, the impacts to agricultural resources involving the conversion of prime soils could be avoided by utilizing existing areas within the city to provide the needed housing.

Transportation and Greenhouse Gas Emissions

SB 743 - Vehicle Miles Travelled

The September 27, 2013, passage of Senate Bill (SB) 743 led the shift from Level of Service (LOS) roadway capacity measurements to Vehicle Miles Travelled (VMT). The LOS method primarily measures automobile congestion at intersections to measure project impacts. However, VMT is a more holistic assessment method and takes into account the total impacts from prioritization of certain transportation modes, project sites, and housing density. The traffic analysis prepared by the City for the SOI boundary change and annexation request (EIR

Addendum #3) only considers LOS. Due to the location and type of land use planned at this project site, VMT analysis, in accordance with SB 743, should be performed to understand the full range of potential transportation and circulation impacts.

County of Santa Barbara Energy and Climate Action Plan and Circulation Element

Emissions from transportation accounted for 38% of the County's 2016 greenhouse gas emissions. The County's 2015 Energy and Climate Action Plan (Page 4-11) goal is to reduce VMT (and thereby reduce greenhouse gas emissions) regionally:

Goal: Decrease the overall use of combustion engine vehicles and the number of single passenger vehicle trips.

- Transportation is the largest contributor of GHG emissions in the county. Transportation emissions can be reduced through three basic approaches:
 - c. Decreasing the amount of VMT.

The City of Lompoc and Annexation Areas A and B are located in a portion of Santa Barbara County that offers relatively limited employment opportunities. For example, 2015 US Census data show that 7,994 people are employed in the City of Lompoc. However, 11,791 people that live in the City of Lompoc commute to work sites located in Santa Barbara, Santa Maria, and other communities.

The proposed project would add 469 households to the City of Lompoc, but it would not add new long-term employment opportunities. As a result, most new residents would likely commute to jobs in other communities. Consequently, the project would increase VMT and not improve the existing jobs-housing imbalance. These outcomes contrast with the County's Energy and Climate Action Plan goal of reducing VMT. Of course, this analysis may change if the City can provide alternative data to demonstrate new and expanding employment opportunities in the city and region.

Additionally, the County is embarking upon an update to the County Comprehensive Plan Circulation Element. A major goal of the project will be to reduce VMT within the county. The proposed conversion of agricultural land to low-density residential development would increase VMT and, therefore, the proposed project appears incompatible with the County's VMT and greenhouse gas emission reduction goals.

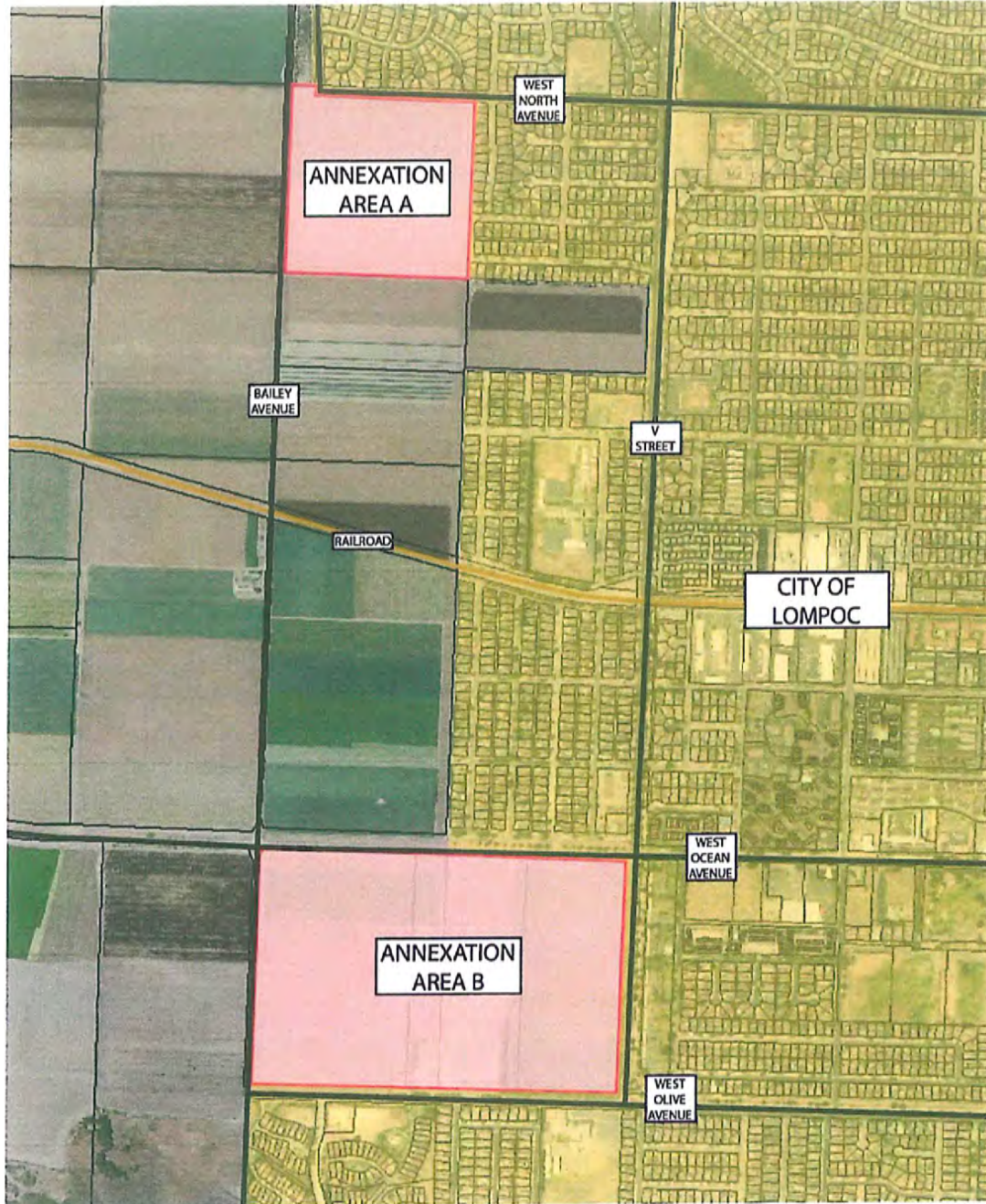
Conclusion

It appears that the proposed project would not comply with certain State, regional and local planning goals and policies; however, additional information might clarify the project description and demonstrate compliance with the goals and policies discussed above. More specifically, additional information is warranted regarding the following: (1) the demonstrated need for this project given the City's apparent capacity to accommodate its housing needs within the existing City SOI; and (2) how the project will reduce VMTs and, consequently, greenhouse gas emissions.

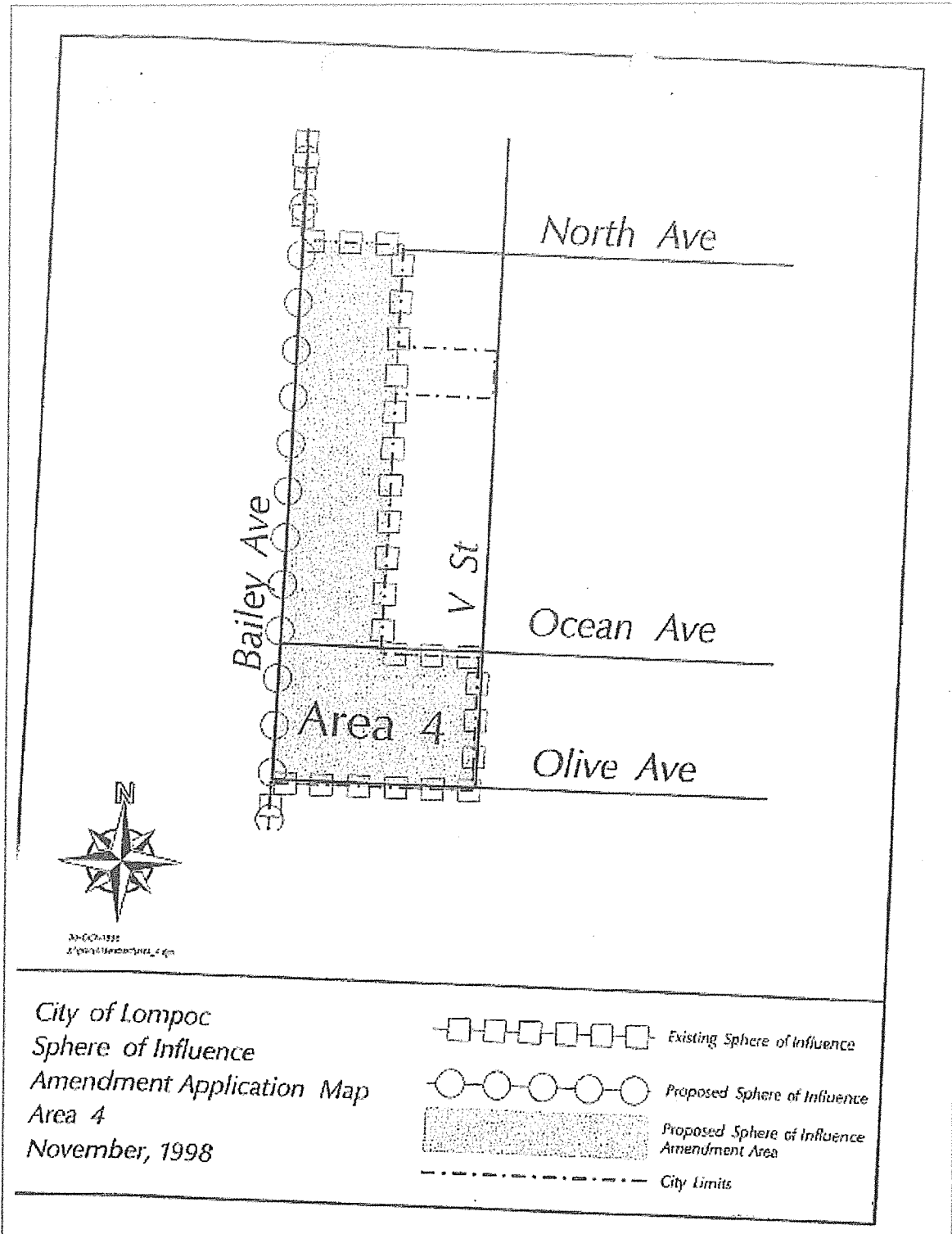
cc Jeff Frapwell, Assistant County Executive Officer, Santa Barbara County Executive Office
Dennis Bozanich, Deputy County Executive Officer, Santa Barbara County Executive Office
Dianne Black, Director, Planning and Development, County of Santa Barbara
Rachel Lipman, Fiscal and Policy Analyst, County Executive Office, County of Santa Barbara
Allen Bell, Supervising Planner, Planning and Development, County of Santa Barbara
Selena Evilsizor, Senior Planner, Planning and Development, County of Santa Barbara
Paul Hood, Executive Officer, Santa Barbara LAFCO
Jim Throop, City Manager, City of Lompoc
Teresa Gallavan, Assistant City Manager, City of Lompoc
Kevin McCune, Public Works Director, City of Lompoc
Brad Wilkie, Finance Director, City of Lompoc
Michael Luther, Assistant Public Works Director/City Engineer, City of Lompoc

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Attachment A: Annexation Area Context Map



Attachment B: City of Lompoc SOI Amendment Application Map to LAFCO in November 1998



Attachment 2



County of Santa Barbara Planning and Development

Lisa Plowman, Director

Jeff Wilson, Assistant Director

Steve Mason, Assistant Director

October 24, 2019

Mr. Brian Halvorson, Planning Manager
City of Lompoc
100 Civic Center Plaza
Lompoc, California 93436

Email: b_halvorson@ci.lompoc.ca.us

Re: City of Lompoc Bailey Avenue Sphere of Influence and Annexation Proposal, Planning and Development Response to City of Lompoc Response Letter

Dear Mr. Halvorson:

The purpose of this letter is to respond to your letter, dated August 26, 2019 (“Lompoc Letter”), in which you provided additional comments and requested a meeting regarding the City of Lompoc’s application to the Local Agency Formation Commission (LAFCO) for the proposed Bailey Avenue Sphere of Influence Change and Annexation. We appreciate the opportunity to provide additional comments and further clarify and support our original position on the proposal. This response letter reiterates the County’s policy positions, provides suggested actions that would address some of the issues raised in the City’s letter, and provides additional data and evidence to support the County’s policy positions, which were set forth in the County’s letter to you, dated September 28, 2018, and discussed at our meeting with you and LAFCO on October 1, 2018.

1. Previous Proposal

The current sphere of influence change and annexation proposal would convert a total of 135 acres of prime farmland in two separate areas along Bailey Avenue and construct 469 housing units consisting entirely of single-family dwellings. A similar, yet larger, Bailey Avenue area annexation proposal went before LAFCO in 1999 and was not approved. It is unclear how the present annexation proposal has changed to be consistent with County and LAFCO policies on preserving prime agriculture and open space and encouraging orderly urban development.

2. Agriculture and Agricultural Buffers

The County recognizes the City’s right and responsibility to establish land use policies governing agriculture and development. The intent of our September 28, 2018, was to inform the City and LAFCO how the annexation of a significant amount of prime agricultural land would be

inconsistent with agricultural resources protection policies adopted by the County. The County stands behind this policy consistency determination; indeed, many of the County's policies align with LAFCO's policies for the protection of agriculture and open space and—although the project does not have to comply with the County's policies—the project must comply with similar or identical LAFCO policies. For example, LAFCO's third policy "Encouraging Conservation of Prime Agricultural Lands and Open Space Areas," states that development shall be guided towards areas containing nonprime agricultural lands. In addition, LAFCO's first policy states that proposals that would conflict with the goals of maintaining agricultural lands in open space uses shall be discouraged. It appears that both County and LAFCO policies do not support the subject proposal because they discourage the conversion of agricultural lands, especially those with prime soils.

While the County does not support the sphere change and annexation, if the proposal moves forward, we would strongly advocate the use of agricultural buffers to minimize potential conflicts between agricultural and residential land uses. The proposed agricultural buffers would assist in minimizing land use conflict between the proposed residential development and some of the remaining agricultural lands in the County. Currently, it appears that these buffers are incomplete. Based on Attachment 6 to the City's response letter, it appears that these buffers are absent from the proposed annexation site on the northern boundary of Annexation Area B and southern boundary of Annexation Area A.

3. Housing

In general, the Lompoc Letter states that the purpose of the proposed sphere change and annexation is to provide additional housing, and that Lompoc is not meeting its Regional Housing Needs Allocation (RHNA). Additionally, the City states that property owners with lots zoned for high density housing are not submitting development proposals due to cost feasibility, and that it cannot build enough housing to meet its RHNA numbers through infill development alone. Our responses to this justification for the project are as follows.

Regional Housing Needs Allocation and Housing Capacity

The number of housing units assigned to Lompoc within the 2014-2022 Regional Housing Number Allocation (RHNA) Plan number is 525 housing units. According to Lompoc's Housing Element Annual Progress Report that captures progress through the end of 2018, the following percentages of housing units have been built for each of the income categories: 16.5% of very low, 3.5% of low, 44% of moderate, and 27% of above moderate housing for the 2014-2022 housing cycle.

There are abundant opportunities to provide housing within existing City limits that would protect prime farmland, reduce vehicle miles traveled (VMT), and meet the City's allocation and encourage housing that is consistent with land use policies. The City's 2014-2022 Housing Element stated approximately 1,800 units of housing capacity exists within the City, including approximately 1,100 entitled housing units. However, according to the Lompoc response letter, these entitled units, "are not anticipated to be built in the next 5+ years due to a number of market factors such as projects entitled during an inflated market (prior to recession), the potential need for costly redesign (to adjust to current market), and high utility infrastructure costs." The City's response letter also states that property owners and developers that own high-density zoned lots

are choosing not to pursue development proposals due to “market forces and cost feasibility of development.” The City could work with these property owners to address the issues that make their developments financially infeasible by creating development incentives (e.g., incentivize redesign, waive fees for permits or permit modifications, and/or work on minimizing utility costs). Further, it is not clear how the proposed annexation and housing development would produce housing that is different than these entitled lots and if these lots could be built in time to count for the current housing element cycle. In addition, the proposed annexation and housing development would likely do little to address the City’s RHNA categories with the lowest compliance percentages in the very low and low income categories. In a similar manner, the City could work with owners of high-density zoned lots and affordable housing providers to overcome cost feasibility barriers, to ensure that it meets the low and very low income RHNA categories. For example, increasing the allowed densities could stimulate development. To conclude, it appears that there are many opportunities to meet the housing needs of the City and its RHNA with existing infill development opportunities that avoid the need to convert prime farmland.

4. Jobs-Housing Imbalance

The County acknowledges that Lompoc is taking many steps to encourage employment opportunities that would address the jobs-housing imbalance. The jobs-to-housing ratio of 0.74 mentioned in the City’s response letter provided by the Santa Barbara County Association of Governments (SBCAG) is the same ratio cited in the Regional Housing Needs Allocation Plan dated July 2013. SBCAG’s 2019 Regional Growth Forecast 2050 projects Lompoc to grow by approximately 8,600 residents by 2050, a similar number as the City of Santa Barbara and about one quarter of the growth projected for Santa Maria. It also states that Lompoc’s projected housing capacity by 2050, based on modeling, is approximately 6,200 units, and its demand is projected to be approximately 4,500 units, leaving a surplus of approximately 1,700 housing units. Based on this analysis, it appears Lompoc will continue to have more housing stock than residents to fill it. Further, the County agrees that the statewide housing crisis is a critical problem that should involve all jurisdictions providing their share of housing. However, the State has also made reducing greenhouse gas emissions and vehicles miles traveled a priority. The US Census’ On the Map data portal provides data on the inflow and outflow of jobs for the City of Lompoc. (See Attachment 1.) Based on 2017 data, there appears to be twice as many residents who leave the City for work (12,424) as residents who work within the City (3,707) and non-residents who work in the City (3,793), combined. As a result, it appears more jobs are needed before additional housing units are justified.

5. Conclusion

To conclude, based on Planning and Development staff’s review of the proposal, the proposed sphere change and annexation are inconsistent with County and LAFCO policies intended to preserve agriculture. Opportunities to meet housing needs can be met by working with property owners of entitled and high-density zoned lands within the City to efficiently use viable development opportunities within existing City boundaries. The City can work with property owners to incentivize the development of entitled projects. Similarly, the City can work with owners of high-density zoned properties to incentivize the development of low-cost, high-density housing, where feasible. Additionally, the County understands significant efforts are being made

Mr. Brian Halvorson
October 24, 2019
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to encourage job growth in Lompoc. However, a substantial number of residents still commute to other areas for jobs. Developing housing units beyond its RHNA are likely to contribute to VMT and work against the goals set by SBCAG in its Regional Transportation Plan/Sustainable Communities Strategy and the County in its Energy and Climate Action Plan.

Thank you for the opportunity to provide comments on the response letter. If you have any questions or require further information, please contact me at (805) 568-2086 or Dan Klemann at (805) 568-2072.

Regards,



Lisa Plowman, Director
Planning & Development Department

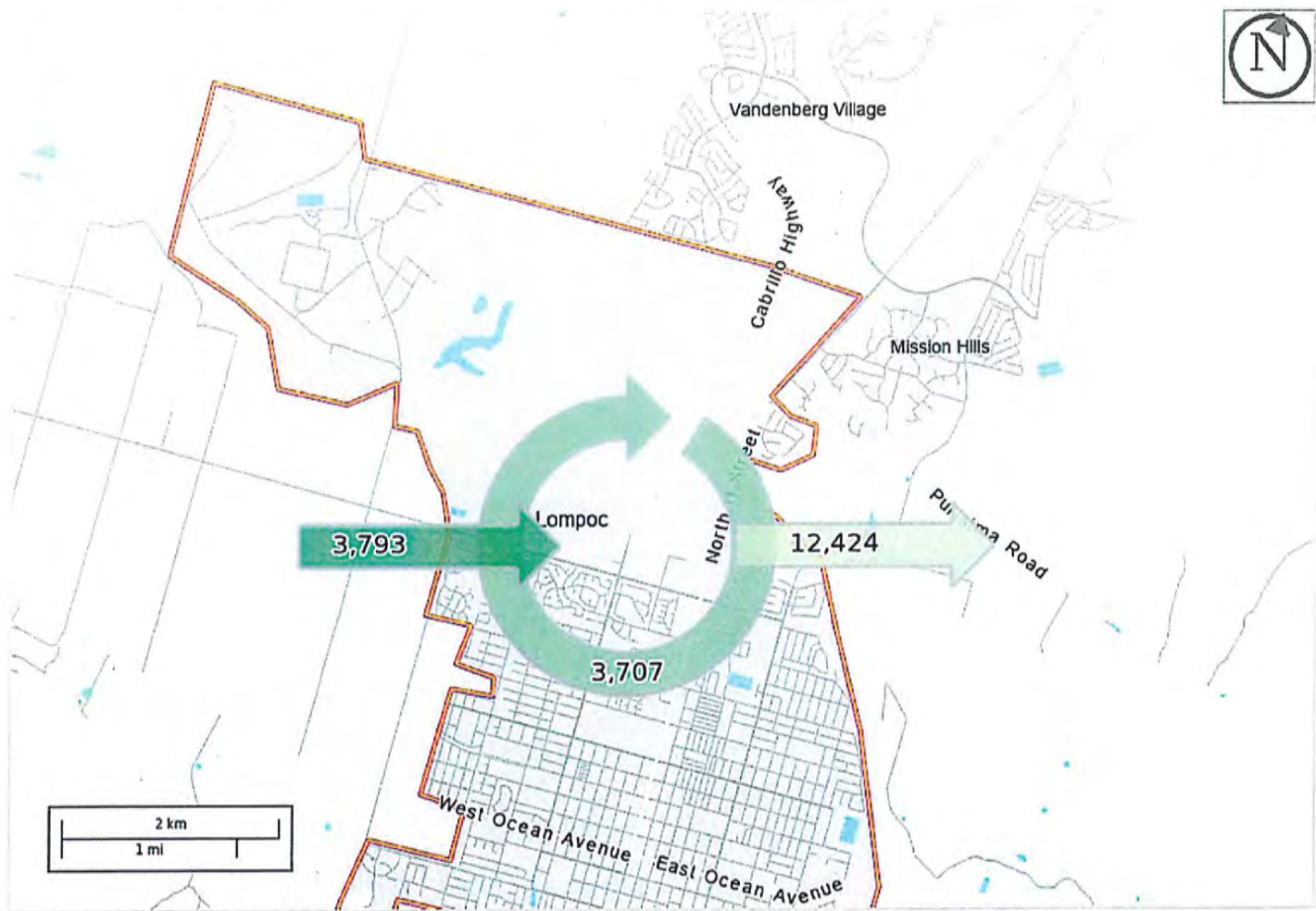
Attachment 1: On the Map Inflow/Outflow for Primary Jobs City of Lompoc, U.S. Census
Bureau

c: Paul Hood, Santa Barbara County LAFCO
Dan Klemann, Deputy Director, Long Range Planning Division
Whitney Wilkinson, Senior Planner, Planning and Development Department
City of Lompoc Mayor and City Council
Jim Throop, City Manager, City of Lompoc
Brad Wilkie, Utilities Director, City of Lompoc
Michael Luther, Public Works Director, City of Lompoc
Christie Alarcon, Community Development Director
Dean Albro, Management Services Director, City of Lompoc
Dennis Bozanich, Deputy County Executive Officer, Santa Barbara County Executive
Office
Lisa Plowman, Director, Planning and Development, County of Santa Barbara
Rachel Lipman, Fiscal and Policy Analyst, County Executive Office, County of Santa
Barbara
Santa Barbara County Agricultural Commissioner's Office
File

Inflow/Outflow Report Primary Jobs for All Workers in 2017

Created by the U.S. Census Bureau's OnTheMap <https://onthemap.ces.census.gov> on 10/16/2019

Inflow/Outflow Counts of Primary Jobs for Selection Area in 2017 All Workers



Map Legend

Selection Areas

Analysis Selection

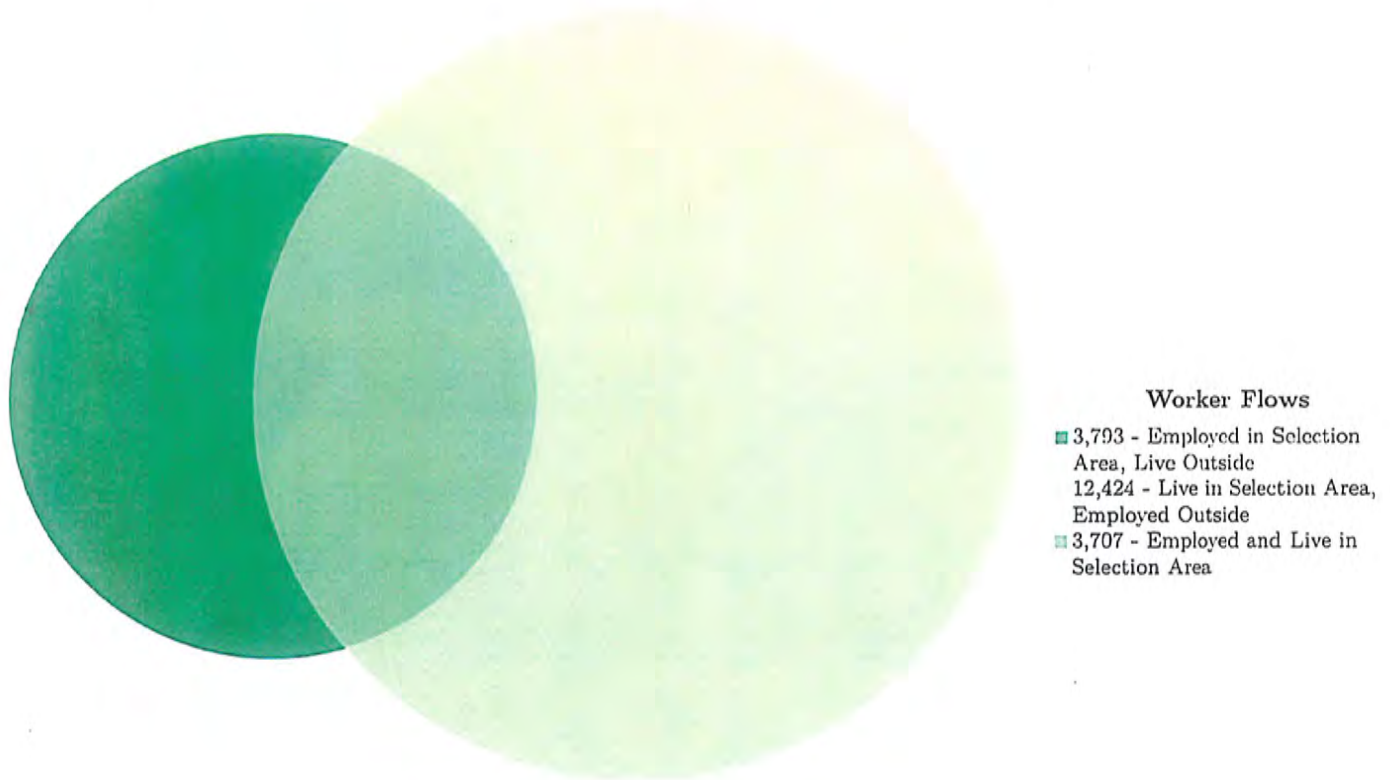
Inflow/Outflow

- Employed and Live in Selection Area
 - Employed in Selection Area, Live Outside
 - Live in Selection Area, Employed Outside
- Note: Overlay arrows do not indicate directionality of worker flow between home and employment locations.



Inflow/Outflow Counts of Primary Jobs for Selection Area in 2017

All Workers



Inflow/Outflow Counts of Primary Jobs for Selection Area in 2017

All Workers

Worker Totals and Flows	2017	
	Count	Share
Employed in the Selection Area	7,500	100.0
Employed in the Selection Area but Living Outside	3,793	50.6
Employed and Living in the Selection Area	3,707	49.4
Living in the Selection Area	16,131	100.0
Living in the Selection Area but Employed Outside	12,424	77.0
Living and Employed in the Selection Area	3,707	23.0

Additional Information

Analysis Settings

Analysis Type	Inflow/Outflow
Selection area as	N/A
Year(s)	2017
Job Type	Primary Jobs
Selection Area	Selection Area Freehand Drawing
Selected Census Blocks	946
Analysis Generation Date	10/16/2019 15:10 - OnTheMap 6.6
Code Revision	d7f8a300c9f4e458f61bc73d3099ca2cb8f8feaa
LODES Data Version	20170818

Data Sources

Source: U.S. Census Bureau, OnTheMap Application and LEHD Origin-Destination Employment Statistics (Beginning of Quarter Employment, 2nd Quarter of 2002-2017).

Notes

1. Race, Ethnicity, Educational Attainment, and Sex statistics are beta release results and are not available before 2009.
2. Educational Attainment is only produced for workers aged 30 and over.
3. Firm Age and Firm Size statistics are beta release results for All Private jobs and are not available before 2011.
4. Data on Federal employment are not available after 2015.

Santa Barbara LAFCO

Study Session:

Bailey Ave. SOI & Annexation to
City of Lompoc

March 4, 2021

File 18-05 Bailey Ave. Study Session

LAFCO

Santa Barbara Local Agency
Formation Commission

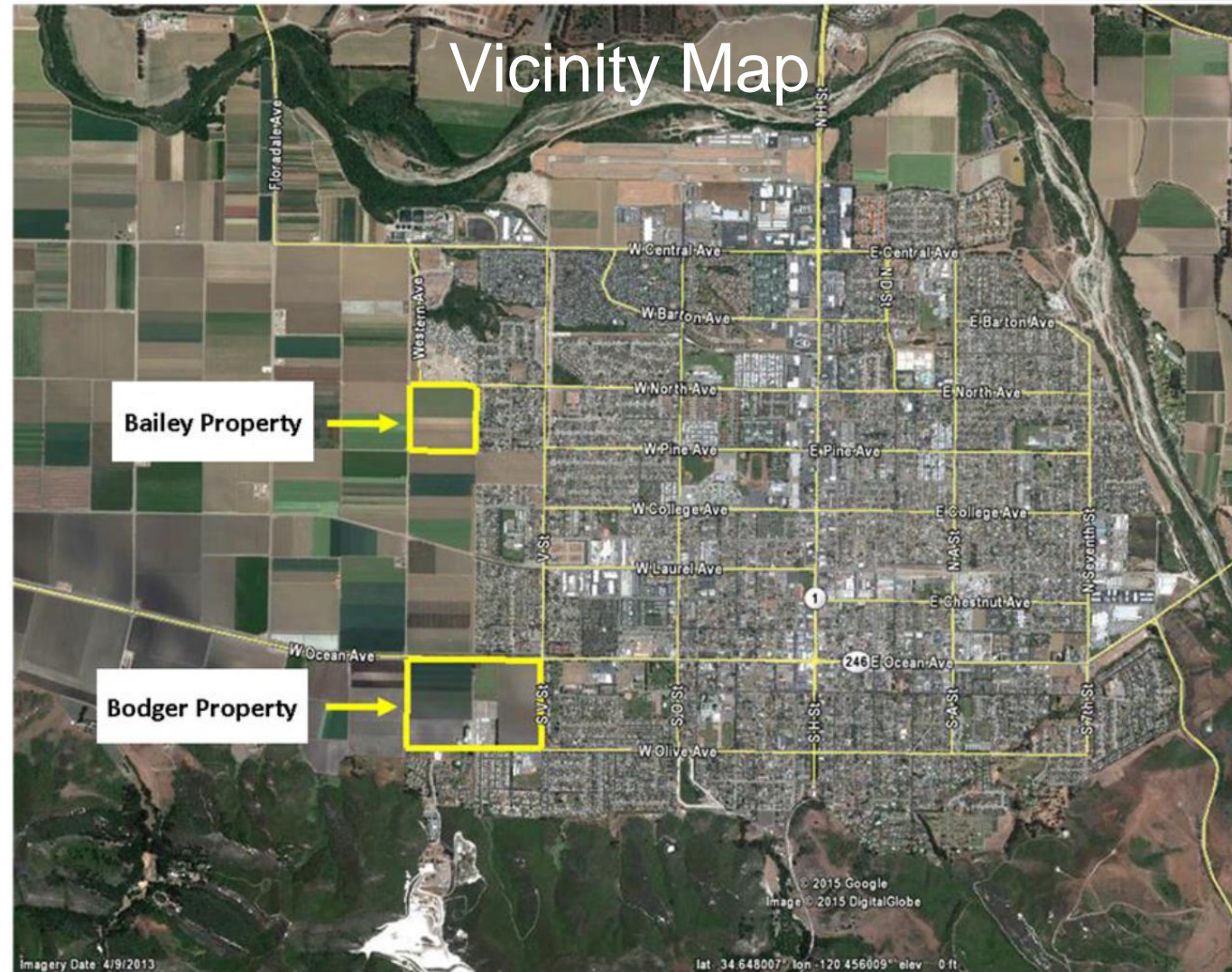
- Proposal Overview
- Concurrent Processing SOI Amendment and Annexation
- Presenters City; County P&D available for questions
- Public Comment
- Q and A

Information Item No 1

File 18-05 Bailey Ave. Study Session

Background

- Area consists 148 acres northwest and southwest edge of City limits
- Specific Plan still needs City approval
- Outside of Sphere of Influence last adopted in 2016
- Final Environmental Impact Report (FEIR) certified Oct 2010
- City Council certified Addendum to Final EIR July 2017



File 18-05 Bailey Ave. Study Session

City Activities

- Resolution of Application submitted by the City - July 2018
- Application has been referred to several agencies for comments
- Information hold letter will be sent to City
- Property Tax Exchange Agreement negotiations has not started yet

File 18-05 Bailey Ave. Study Session

LAFCO POLICIES & FACTORS

Factors: Cortese-Knox-Hertzberg Act

- Government Code Section 56668 identifies a number of factors that are to be considered by LAFCO in reviewing a proposal.

• Population and Land Use	• Need for Services	• Impact on Adjacent Areas
• Availability of water supplies	• Agricultural Lands	• Definite Boundaries
• Consistency with General Plans and Reg. Trans. Plan	• Sphere of Influence	• Other Agency Comments
• Ability to provide services	• Commission Policies	• Housing
• Comments from landowner, voters or residents	• Existing information about existing land use	• Environmental Justice

File 18-05 Bailey Ave. Study Session

LAFCO

Santa Barbara Local Agency
Formation Commission

SOI & Plan for Services

- Properties are outside of SOI
- Sphere of Influence Update in 2016
- City 1998 application request was denied by LAFCO
- Property must be inside the SOI to be annexed
- For LAFCO approval Pre-Zone & Plan for Services needs to be submitted
- G.C. 56425(e) Determination required
- G.C. 56377 consistency determination necessary

Information Item No 1

File 18-05 Bailey Ave. Study Session

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Summary

- LAFCO will continue to analyze the proposal
- City identified significant and unavoidable impacts that required the City to adopt statement of overriding considerations in the FEIR
- LAFCO is also required to make similar CEQA findings
- Key Issues, Factors, and Policies to be addressed before LAFCO consideration are outlined in the study session report
- Waiting for new information and a Property Tax Agreement to continue processing the application

Information Item No 1

File 18-05 Bailey Ave. Study Session

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Summary Cont.

- City to process a Specific Plan after annexation
- LAFCO input still being explored

Next Steps

- City to address feedback
- City Council action Summer 2021
- Annexation and SOI Application revised

Information Item No 1