

The following Supplemental Information was submitted to the Planning Commission:

**June 9, 2010 meeting**

- 1) Letter from Judy Taggart of the Healthy Lompoc Coalition, dated May 21, 2010
- 2) Letter from Santa Barbara County Public Health Department, dated May 10, 2010
- 3) Letter from Warren Culberson, received June 3, 2010
- 4) Letter from Christina McGinnis, dated October 17, 2008
- 5) Letter from Stephen Orosz of Summit View Homes, LLC dated June 8, 2010

**June 23, 2010 meeting**

- 6) Letter from Christina McGinnis from the Open-space Preservation Education Network, dated June 16, 2010

**July 14, 2010 meeting**

- 7) Letter from Edward Wineman, dated June 28, 2007
- 8) Letter from Art & Sherry Hibbits, dated July 14, 2010
- 9) Letter from Janice Keller, dated July 14, 2010
- 10) Letter from Steve Jordan of Baroda Farms, dated July 14, 2010

# Lompoc Valley Community Health Improvement Coalition

PO Box 368 Lompoc, CA 93438

805-736-5985 direct/805-740-2035 fax

May 21, 2010

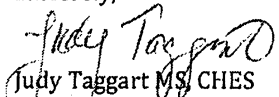
To Whom It May Concern:

On behalf of the Lompoc Valley Community Health Improvement Coalition (LVCHIC), I am writing this letter in support of the suggested changes to the Land Use and Circulation Elements of the Lompoc General Plan. Specifically, the LVCHIC is committed to improving the health of the Lompoc Community by ensuring that our environment and local policies support health.

The Lompoc Valley Community Health Improvement Coalition is a multidisciplinary group comprised of key stakeholders in the community. The coalition was formed in response to the rising rates of obesity and preventable health problems in our community. Over the past year the Coalition has conducted local assessments including walkability, bikeability, safe routes to schools, access to healthy food and green space. The local data and national research make it clear that upgrading infrastructure and updating local policies will lead to improvements in community health and public safety in Lompoc.

The Coalition was pleased to lend our support to community leaders and city staff during the difficult process of updating elements to the General Plan because we have come to understand the impact that environment and policy have on the health of our community.

Sincerely,

  
Judy Taggart MS, CHES  
Director of Community Health, LVCHO  
Project Director, Healthy Lompoc Coalition

Lompoc Valley Community Health Improvement Coalition Members:  
C. Dennis Anderson, President/CEO, Lompoc Chamber of Commerce;  
Gilbert Andersen, MD, Internal Medicine;  
Rollin Bailey, MD, Valley Medical Group, President, LVCHO  
Kathy Bertelsen, RD, Food Service Director, Lompoc Unified School District;  
Pat Brady, Administrator, Lompoc Good Samaritan  
Diane Burton, Principal, Lompoc Unified School District;  
Barry Coughlin, MD, Cardiologist;  
Sylvia Corral, MD, Family Practice;  
Tim Dabney, Chief, Lompoc Police Department;  
Don Deming, Captain, Lompoc Police Department;  
Jacklyn Kelly, Regional Manager, Public Health Department Clinic;  
Dena Lara, Unit Director, Lompoc Boys and Girls Club;  
Julia Leeth, Pastor, Lompoc First Presbyterian Church  
Amy Lopez, Outreach Coordinator, Food Bank of Santa Barbara County  
Michelle MacKinnon, Child Nutrition Coordinator, Lompoc Unified School District;  
Steve McDowell, Executive Director, Lompoc Valley Community Healthcare Organization;  
Teresa McIntyre, Wellness Director, Lompoc YMCA;  
Ken Ostini, President, Lompoc Unified School District Board;  
Shirley Peterson, UC Extension Advisor, Nutrition, Family and Consumer Sciences;  
JoAnne Plummer, Program Director, City of Lompoc Parks and Recreation Department;  
Jason Reynolds, Owner, State Farm Insurance/Chamber of Commerce Chair-Elect;  
Dulcie Sinn, Garden Project Manager, LHDCD Garden Project  
Jody Taylor, Executive Director, Lompoc YMCA,  
Margaret Weiss, MPH, Director of Health Education, Sansum;  
Kim Wells, Registered Dietician, WIC Program

**RECEIVED**

JUN 02 2010

CITY OF LOMPOC  
PLANNING DIVISION





Takashi M. Wada, MD, MPH *Director/Health Officer*  
Anne M. Fearon *Deputy Director*  
Suzanne Jacobson, CPA *Chief Financial Officer*  
Michele Mickiewicz, MPH *Deputy Director*  
Elizabeth Snyder, MHA *Deputy Director*  
Peter Hasler, MD *Medical Director*

May 10, 2010

Lompoc Planning Commission  
Honorable Members of the City Council

RE: Draft Lompoc General Plan

**RECEIVED**

JUN 02 2010

CITY OF LOMPOC  
PLANNING DIVISION

Dear Members of the Planning Commission and City Council:

We greatly appreciate the opportunity to provide input as you develop your General Plan for the City of Lompoc. Research and scientific data have revealed that most preventable health problems, including more than half of all premature deaths, are caused by personal behavior and the environment. We can prevent a great deal of premature death and disease through thoughtful planning and policy-making, increasing both the quality and length of life in Santa Barbara County. Prevention can be addressed through a number of factors such as transportation and mobility, built environment, access to health care, housing, nutrition, and physical activity. We strongly recommend that public health concepts be incorporated throughout your general plan to ensure that impacts to health in future development are taken into consideration.

Specifically, we support the inclusion of language to the improve public's health through the built environment such as:

- Creating neighborhoods that are safe for walking and biking by people of all ages
- Creating neighborhoods that promote physical activity
- Ensuring convenient access to affordable and healthy food
- Reducing air pollution, including increased protection from exposure to secondhand smoke in all venues where the public has access or congregates.
- Providing a wide variety of housing options for people of all income levels to help address the need of the local healthcare workforce and access to healthcare providers,

### Goals and Policies

There are many policies that could reflect consideration of health related elements. We support adding public health concepts in these elements of the General Plan such as land use policies (e.g. mixed-use development, "walkable" and "bikeable" places, and reducing the need for parking), environmental resource policies, (e.g. air quality, food and agriculture), and circulation policies (pedestrian and bicycle infrastructure).

Sometimes it is challenging to move from high level policy discussion to the implementation level where policy is translated into practice. In the policy and implementation measures

sections of the Draft Lompoc General Plan, it may be helpful to provide some examples of actions that are within the role and authority of the city. Some actions that have been taken in other communities and may be modified for Lompoc include:

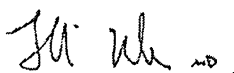
- Promoting new grocery stores in underserved communities
- Examining current zoning codes and policies to increase opportunities for physical activity and access to healthy food
- Conducting an audit to determine if local government owns land that could be made available for community gardens
- Reviewing existing vending machine contracts and eliminating the unhealthy snacks or balancing the number of unhealthy snacks or sugar-sweetened beverages in local parks and recreation centers
- Developing streets that enable safe access for all users, including pedestrians, bicyclists, bus riders, and people with disabilities
- Creating a healthy food zone around schools by regulating the location of fast food restaurants
- Restricting the number of liquor and/or tobacco retail outlets, adult businesses, or mobile food vendors located near schools
- Providing economic development or zoning incentives for healthier food purveyors
- Developing an obesity prevention resolution to promote obesity prevention policies
- Creating specific measures (e.g. rates of pedestrian injury) to measure impacts of changes
- Encouraging community centers, day-care centers, and after school programs to serve health, balanced foods
- Ensuring the availability of drinking water in schools, parks and city buildings
- Providing guidance and/or incentives for reducing exposure to secondhand smoke in multi-unit housing settings, including: affordable, subsidized and/or market-rate housing, or in a percentage of new units permitted, etc.

Some of these steps require careful balancing between the public's interest (the harm to the public caused) and the economic impact on the property owner (allowing the owner to receive a fair return on his or her investment).

There are wonderful resources and examples through the National Policy and Legal Analysis Network to Prevent Childhood Obesity (NPLAN) at the website: [www.nplanonline.org](http://www.nplanonline.org)

The Santa Barbara County Public Health Department focuses on the community as a whole and recognizes the vital role a General Plan can play in the lives of all residents. We are committed to the well-being of county residents and wish to join with the City of Lompoc in the development and implementation of policies to achieve the goals of a healthier community.

Sincerely,



Takashi Wada, MD MPH  
Director and Health Officer

**SUBJECT Warehouse and office building at 415 West Laurel  
PARCEL NUMBER 089-231-11-00  
REAR 50 FEET of LOTS 21,22,23,24,25 of BLOCK 231**

The city of Lompoc has rezoned the subject building from Co to R3 and the owners would like to have the zoning changed back to the original zoning of industrial. The owners are strongly opposed to the new zoning citing as their primary concern a fear that such a rezoning would make the future sale of their property nearly impossible. The site does not meet the requirements of the new zoning. The minimum size for a standard R3 lot is 7000 square feet. The subject lot is only 6250 Sq. Ft. This along with setback requirements, parking capacity and other issues render the existing building useless for that zoning.

The simple fact remains that there is a large office and warehouse there. It would cost thousands of dollars to raze that to the ground and make that shovel ready for a new residential building to be built in its place. The cost of demolition would be far more than the value of the empty lot, and a new apartment on that location could not produce enough income to justify the cost of construction. Therefore, such a potential hardship essentially renders the property worthless.

The existing building has been located at its current location for over half a century. We bought the subject lot that was zoned Light Industrial in 1959. We designed and built the present office and warehouse the same year. It has been used as such ever since and there have never been any complaints regarding its use in all that time.

Although Culberson Construction Co. is not currently building, the company has maintained an office at the site with the purpose of locating a buyer intent on reopening and reinvesting in the company. In fact, the company had located a purchaser and was in the process of negotiating the sale of the property. However, when the buyer realized the zoning would not work for his operation, the potential purchaser pulled out. The buyer would have provided a public service to both the neighbors and the entire city once the facility was reopened.

Nonconforming uses, also referred to as "grandfathered" uses, are uses in legal violation of the current zoning standards due to the land or structure having existed before such standards were put in place. Nonconforming use status would not solve the problem as it requires a special permit every time an office is rented. The need for a conditional use permit would result in an increased uncertainty for buyers by adding many more

obstacles when negotiating a potential sale or lease.

Because of the R3 zoning it cannot be rented. This means it cannot produce any income to pay property taxes, utilities or maintain it in good condition. When the building is repainted it only takes days for taggers to repaint all the graffiti. When the glass is replaced it is broken again in days. Therefore, with the present zoning, the city runs the risk of this building becoming permanently empty. Because of the nonconforming use uncertainty for any potential user, certainly there are limitations to what can be done there.

This is not traditionally how a city does business. This is a property rights issue; this is a bad step for this city. It's wrong. It's a taking of rights. R3 zoning would effectively prohibit or unreasonably restrict the utilization of the property. Granting Light Industrial zoning will alleviate a clearly demonstrable hardship approaching confiscation, as distinguished from a special privilege or convenience sought by an applicant. Modern zoning laws presume that no citizen has a right to control his own land, but that every citizen has a right to control his neighbor's.

The United States was founded on the principles of individual freedom, free markets, private property, and limited government. When the government is involved in the issue of land-use, it should be to protect -not destroy- the inherent and inalienable rights of its citizens. We would like to sell the property to someone who will use it. But it will only sell if it can be used for its highest and best use. Its highest and best use is an office with and adjoining warehouse, and we wish to have it zoned accordingly.

We appreciate your consideration on this matter,

Very truly yours,



Warren L. Culberson

**RECEIVED**

JUN 03 2010

CITY OF LOMPOC  
PLANNING DIVISION

**O.P.E.N.**  
**OPEN-SPACE PRESERVATION EDUCATION NETWORK**  
A project of the Environmental Defense Center

October 17, 2008

To: Ms. Lucille Breese, Planning Director  
City of Lompoc Planning Department  
100 Civic Center Plaza, Lompoc, California 93438-8001

**Re: City of Lompoc Draft Phase I General Plan Update (Land Use Element-Phase I)  
and scoping for Draft EIR**

Dear Ms. Breese:

The following comments are submitted by the Environmental Defense Center (EDC) in response to the Draft Phase I General Plan (GP) Update for the City of Lompoc and the associated Environmental Impact Report (EIR) for the elements under consideration. This letter has been prepared as part of the Open-Space Preservation Educational Network (OPEN) project, which provides a proactive approach to assessing General Plans and the planning process throughout Santa Barbara County. The purpose of the OPEN project is to engage all interested sectors of our communities in a dialog about developing policies and programs to protect agricultural and open space lands and the urban-rural interface.

In addition to assessing policies and related ordinances as well as local efforts that seek to protect agricultural resources, part of the project's purpose is to review the policies of other jurisdictions and their respective approaches to OPEN issues. This approach includes a comprehensive analysis of policy tools used in other areas that support the preservation of rural lands and agricultural operations, open space, and the urban-rural boundary. This analysis can be incorporated into ongoing planning processes, such as during GP and other local policy updates. For example, other jurisdictions have successfully included agricultural buffer zones in areas where more urbanized uses have the potential to threaten the future viability of agriculture.

The City of Lompoc's Phase I GP update has the potential to affect lands in active agricultural production, for example unincorporated areas of the County that would likely be annexed to the City under the Land Use Element update's Specific Plan for Bailey Avenue. Proposed land use changes under the GP buildout scenario within the City's boundaries would also potentially affect agricultural areas *outside* of the City's existing GP area, and could present conflicts with these agricultural properties if not carefully

planned to address the need for buffer zones and transition areas between active agriculture and more urbanized uses.

There are numerous planning mechanisms and policy tools available to protect agriculture in Santa Barbara County and in the Lompoc Valley that have not yet been identified in the City's GP update. Ideally, the updated GP Land Use Element should assist the City in providing the setting needed to retain long-term agricultural uses outside of City boundaries (by reducing agricultural/urban conflicts via buffer zones and carefully planned transition zones such as greenbelts). The Land Use Element should also provide guidance to planners to address the conversion of agricultural properties into more urban uses for already-annexed and planned annexation areas of the City. The interim uses of these properties as active agricultural land should be addressed in either the Land Use Element or in an interim Agricultural Element.

This letter focuses on a wide range of issues related to the long-term planning goals for the City of Lompoc, including:

- Suggestions for additions to the GP that address the need to confine growth within the City's boundaries. Growth of the City near its boundaries should not conflict with uses outside of its boundaries (e.g., agriculture).
- The need for the City to plan for interim agricultural uses within City's boundaries prior to buildout of proposed Land Uses in the GP.
- The need to update all related elements of the GP together.
- Recommendations for strengthening specific policies in the current draft Land Use Element to help protect agricultural lands and more urbanized uses from potential conflicts, and to preserve the Urban Limit Line of the City.
- The need to carefully consider the impacts of particular implementation measures contained in the Land Use Element of the GP with regard to their potential to permanently convert agricultural lands into urbanized uses.

**Project Background:**

The City of Lompoc is currently in the process of updating its General Plan including current Sphere of Influence (SOI) and potential annexation areas that may ultimately be included in the City's planning authority. The 2030 General Plan Update is being completed in two phases. The Housing, Land Use, and Circulation Element updates and associated Environmental Impact Report (EIR) have been completed as Phase 1. The Conservation, Open Space, Noise, Safety, Parks and Recreation, Urban Design, and Public Services Elements and associated Supplemental EIR will be completed as Phase 2.



**Discussion and Recommendations:**

1. The GP must address the need to confine growth within City limits and conduct growth on its boundaries such that it does not conflict with uses outside of its boundaries (e.g., agriculture).

Perhaps the single most important consideration for any City is how it guides and confines growth within its urban limit line and City boundary to prevent urban sprawl. While the current Land Use Element for the City does define an urban limit line, there is potential for this boundary line to move outward in the future and eventually consume prime agricultural lands that exist around the City boundary in unincorporated areas of Santa Barbara County. The preservation of agricultural land is at a crossroads in the State of California (particularly in south-central, central and northern California) due to land values and development pressures, and Cities must consider the effects of their growth on agricultural lands outside of their boundaries.

SB375, a newly approved law, aims to reduce greenhouse gas (GHG) emissions by discouraging sprawl development and dependence on car travel. SB 375 helps implement AB 32's GHG reduction goals by integrating land use, regional transportation and housing planning. SB 375 requires each metropolitan region to adopt a "sustainable community strategy" (SCS) in its regional transportation plans to encourage compact development that aligns with regional GHG emissions reduction targets set by the California Air Resources Board (ARB). SB 375 requires that ARB certify that the SCS will reach these targets by decreasing GHG emissions from automobiles and light trucks. Projects consistent with a SCS qualify for relief from some California Environmental Quality Act (CEQA) requirements, which will reduce project costs, processing time and legal risks. This law should be carefully considered to avoid urban sprawl in the City.

Other planning jurisdictions are implementing successful policies and associated ordinances that preserve agricultural land. These are described in detail in various portions of this letter. These policies and ordinances provide examples of the types of proactive planning approaches that can be incorporated into the GP update for the City of Lompoc.

Policies and associated development standards addressing the appropriate division and buffer of rural land uses from urban influences should be included in the GP's Land Use Element in order to achieve the long-term protection of the urban growth boundary and the agricultural lands located outside of the City's boundaries. Currently, proposed policies do not adequately protect agricultural lands from the conflicts that are often associated with more urbanized development and the buildout of several properties that exist either near or outside of the urban boundary lines. An important example of this is the currently-proposed Specific Plan for Bailey Avenue, which would permanently convert approximately 270 acres of prime agricultural land currently in active agricultural use.

Although the Specific Plan site is currently not within the City's Sphere of Influence (SOI), the Bailey Avenue Specific Plan is located within the City's urban limit line and is designated in the City's approved Land Use Element as VLDR, or Very Low Density Residential Development and LDR, Low Density Residential. However, it is still within the County's unincorporated area and is zoned for agricultural uses ranging from AG-II-100 to AG-40. The Specific Plan area has been historically used for agricultural purposes, primarily as irrigated croplands (row crop and flower seed production). Flower seeds are produced on the southern most portion of the site and row crops like lettuce, celery, broccoli, and cauliflower are produced on the remainder of the Specific Plan area. The Natural Resources Conservation Service (NRCS) Soil Survey of Northern Santa Barbara Area, California (July 1972) states that the soil types (i.e., Mocho loam and Mocho silty clay loam) on the portions of the Specific Plan area proposed for development are considered Class I Prime Soils (Rincon Consultants, 2008).

The proposed land uses in the Specific Plan for this area are much more intense than what was originally specified in the current Land Use Element. Buffering this level of intense land use from agricultural uses outside of the urban limit line and vice-versa should be given careful consideration. The Specific Plan's preliminary proposed residential and commercial land uses are not consistent with the County zoning. Removing prime soils from agricultural production would conflict with County policies set forth in the Comprehensive Plan's Agriculture Element (Rincon Consultants, 2008).

If this proposed annexation area is approved in the future by LAFCO and annexed into the City, intensified development could occur that would likely create increased conflicts between agricultural operations and residential use. The operations may create an annoyance from the noise, smell, dust, and chemical applications that may occur on the agricultural lands. An important consideration for these lands (particularly given the likelihood of annexation and development) is the need to carefully plan for the types of uses that would be allowed within the proposed 200 foot buffer zone on the western portion of the property (that which abuts the agricultural land).

Urban growth boundaries do not, by themselves, protect agriculture, and the buildout of several of the City's properties currently zoned for intense uses inside the urban boundary would increase potential conflicts with larger agricultural parcels outside of the City. Addressing what can and cannot be placed in buffer zones near existing agricultural uses is an important consideration, as well as how these buffers are maintained and managed. This can be achieved through the development of clear policy language for these required buffers. If farmland conversion and/or higher intensity development occurs in or near existing agricultural operations, it is critical to ensure that nearby agriculture is protected from a "domino" development effect through use of carefully executed and planned buffer zones.

#### Buffer Zones

Other planning jurisdictions in California have developed very specific requirements to address the need for buffer zones between more urbanized development and agricultural land uses. For example, the City of Davis' Right to Farm (RTF) Ordinance addresses the need for carefully planned buffer zones for agricultural lands. In order to reduce impacts from increased development as proposed by the GP, incorporation of some version of this type of language into the Land Use Element for the City should be considered. The full text of this RTF example is provided in Exhibit 1, and the major highlights of this ordinance include:

- \*A requirement that minimum 150 foot buffer areas are supplied by the encroaching development (comprised of a 50 foot wide agricultural transition area contiguous to a one hundred foot wide agricultural buffer).
- \*Specific and detailed definitions defining what can and cannot be contained within the buffer zone.
- \*Requirement that the buffer zone be dedicated in fee title or by easement to the County.
- \*Requirement that a maintenance plan for the buffer is prepared and approved.

The City should also incorporate policies (as provided in the City of Davis example) requiring buffers to be the financial responsibility of the encroaching party, which generally is the urban developer. Buffer requirements must allow for site-specific buffer solutions under special circumstances. Policies in the Land Use Element should require that when discretionary projects are proposed next to agriculturally-zoned land (even if the agricultural land is *outside* of the City's boundaries), permanent on-site buffers must be incorporated into the project design to minimize impacts on adjacent agricultural operations. The encroaching project must also provide plantings (or other buffers deemed appropriate for the site) and maintain the appropriate vegetative shelter-belt and/or buy buffer rights from the adjacent farmer (if applicable). City planners should have a set of specific guidelines (in the form of development standards to support agricultural protection policies in the Land Use Element of the GP) that provide recommendations for site-specific buffer solutions appropriate to meet safety and operational requirements. Species of plants used, prevailing wind directions, elevations, method of application, etc., all affect the design of successful buffers. These guidelines should be developed during the GP update.

The City of Lompoc has already heard from concerned landowners in residential areas regarding pesticide drift and other agricultural disturbances created from siting new urban uses next to active agriculture. Since the City of Lompoc is known for strong wind patterns, the concern with pesticide drift is an issue that must be directly addressed in buffer zone language. Wind patterns should be assessed and appropriate buffers designed on a case-by-case basis to address this problem. Where the prevailing NW wind patterns in the City are shown to create a potential hazard, buffer zones should be large, and separations in the form of tangible barriers, such as windrows or walls, should be required.

An action item should also be included in the Land Use Element to establish, maintain and properly fund programs that educate the public about right-to-farm laws, legal farming practices and other issues pertinent to the rural-urban interface.

#### Greenbelt Resolution

The Bailey Avenue Specific Plan would permanently convert prime agricultural land into urbanized uses, and potentially create a precedent for additional agricultural lands to be annexed into the City. The OPEN project team does not believe that annexation of the Bailey Avenue Specific Plan area is appropriate. However, if the annexation request does move forward through the LAFCO and Santa Barbara County approval process, planning tools are available to help preserve the urban growth boundary of the City. Other nearby jurisdictions, such as the City of Santa Maria (SM) and the City of Guadalupe, have entered into resolutions to ensure that greenbelts are created around the perimeter of (and/or adjacent to) proposed annexation areas in exchange for the loss of agricultural lands. In essence, these types of "greenbelt agreements" can serve to ensure that the urban growth planned for the City does not expand into adjacent rural areas.

The City of Lompoc should consider creating a greenbelt resolution similar to that prepared for the City of SM, where the City agreed not to expand urban uses outside of certain areas proposed for annexation. A copy of this resolution as well as another prepared for the City of Guadalupe is provided as an example for the City's consideration as Exhibit 2. If crafted for the City of Lompoc, the greenbelt resolution should be very specific about what can and cannot go into greenbelt areas. For example, greenbelts should not allow for increased development above that allowed under the current zoning. Any greenbelt resolution adopted by the City must be permanent and enforceable.

Since the proposed annexation of the Bailey avenue property would require approvals from LAFCO and the buy-in of Santa Barbara County to effect the Specific Plan proposal, a proactive measure in the form of a greenbelt resolution would provide assurances to responsible parties that if this annexation is approved, it would not set a bad precedent for the expansion of urban growth outside of the City limits into prime agricultural lands. LAFCO has agricultural protection and annexation/SOI policies that it must adhere to, and such a greenbelt resolution would likely assist LAFCO in making necessary findings and would also provide assurances to the County that it would not lose additional agricultural lands to future development for this area when the GP is revisited or revised in the future in response to additional annexation requests.

For example, LAFCO policies encourage the conservation of prime agricultural lands and open space areas, and discourage 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. LAFCO policies require that development shall be guided towards areas containing *nonprime* agricultural lands, but the proposed annexation area contains prime

soils, as described above. LAFCO policies also require that the loss of any prime agricultural soils should be balanced against other LAFCO policies and a LAFCO goal of conserving such lands. The Specific Plan proposal is currently inconsistent with the City of Lompoc's adopted SOI and would also conflict with agricultural protection policies in the Agricultural Element of the County's GP, and these inconsistencies are considered "factors unfavorable to approval" in LAFCO policies. LAFCO must adopt findings relative to its decision to annex land into the City. Further, LAFCO must give special considerations in SOI designations for areas with agricultural resources and support facilities. 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 according to LAFCO policies (<http://www.sblafco.org/policies.html>). For these reasons, *if* the Bailey Avenue Specific Plan is annexed, the City should adopt a greenbelt resolution.

2. All phases of the General Plan update should be completed together in the EIR and CEQA process, since they are directly related.

As proposed by the City, the draft Housing, Land Use, and Circulation Element updates and associated Environmental Impact Report (EIR) will be completed as Phase 1 of the General Plan Update. The Conservation, Open Space, Noise, Safety, Parks and Recreation, Urban Design, and Public Services Elements and associated Supplemental EIR will be completed as Phase 2. As the Draft Land Use Element states:

All elements of the General Plan have equal legal status. Because no element is legally subordinate to another, the General Plan must resolve potential conflicts between or among the elements through clear language and policy consistency. All General Plan elements must be consistent with one other. Any individual provision of the General Plan should not require the City to take an action prohibited by another General Plan provision. In addition, the assumptions and vision used to create individual portions of the General Plan need to be uniform and consistent. Because General Plan text and diagrams are both integral parts of the General Plan, they must be consistent with each another. Thus, the diagrams of the General Plan are intended to be a graphic reflection of the General Plan text. Although the General Plan must be internally consistent, it is important to recognize that community objectives are sometimes inherently in conflict. Therefore, *blind pursuit of one objective may, in some cases, inhibit the achievement of other community objectives*. Thus, when implementing the General Plan, decision-makers must strike a balance between competing objectives, recognizing that all objectives cannot be fully implemented all the time (emphasis added).

Table 1-1 in the draft Land Use Element shows the elements' policy issues which overlap for the following issues:

Table I-1 Index to Location of State-Mandated General Plan Issues										
Issues	General Plan Elements									
	Land Use	Circulation	Housing	Conservation	Open Space	Noise	Safety	Parks & Recreation	Urban Design	Public Services
<b>Land Use</b>										
Distribution of housing, business, industry	•		•							
Distribution of open space	•				•					
Distribution of natural resources	•			•						
Distribution of recreation facilities	•							•		
Location of educational facilities	•									•
Location of public buildings	•								•	
Location of future solid and liquid waste facilities	•			•						•
Identification of areas subject to flooding				•			•			
<b>Circulation</b>										
Major thoroughfares		•								
Transportation routes		•								
Terminals		•								

Source: Rincon Consultants, 2008.

As this table shows, several of the proposed changes in the Land Use Element overlap with issues that will be considered in the Conservation and Open Space Elements. Since the Conservation and Open Space Elements address agriculture, biological resources, and conservation issues by including physical protection policies for important areas within the City, they must be considered together with the proposed physical development of the Land Use Element. It is not appropriate to approve the Land Use Element and its guidance for on-the-ground development without having access to data, policies and information that will be contained in the Open Space and Conservation Elements. Rather than allowing the physical limitations of the land (e.g., sensitive biological resources, agricultural lands, open space areas, and other conservation issues) to guide what can be proposed for a certain area, the Land Use element will be approved in a “vacuum”, and the Open Space and Conservation elements policies will *react* to the proposed land use scenario in the Land Use Element instead of proactively guiding what development is appropriate for various areas of the City. Since the General Plan was updated fairly recently, it would be more appropriate to prepare all of the State-required elements together rather than “piecemealing” them in a sequence that is inefficient and may result in potential conflicts or inconsistencies. Regardless of the need to update the Housing element, it is inappropriate to phase these related elements.

3. Specific Policies in the current draft Land Use Element should be revisited and strengthened to protect agricultural lands and more urbanized uses from potential conflicts and to preserve the Urban Limit Line of the City.

The following proposed Land Use policies in the Land Use Element should be further revised to allow for specific development standards and implementation policies

for agricultural land and urban limit line boundary protection. Proposed Policies 1.2, 1.3 and 1.4 currently read:

Policy 1.2 The City shall maintain a compact urban form by delineating an Urban Limit Line which establishes the ultimate edge of urban development within the City.

Policy 1.3 The City shall encourage development of under-developed and vacant land within its boundaries; and shall oppose urbanization of agricultural lands east of the City and west of Bailey Avenue.

Policy 1.4 The City shall encourage Santa Barbara County and the Local Agency Formation Commission to plan urbanization within municipalities in order to protect prime agricultural land outside the Urban Limit Line and to efficiently utilize public infrastructure.

Methods for ensuring that the urbanization of agricultural lands does not occur outside of the Urban Limit Line (as required by the above policies) could be significantly strengthened by requiring a greenbelt resolution, as discussed in Item 1 above (see Exhibit 2 for example language). It is imperative that the City (together with the County) consider the alternative policy tools and options to help protect agricultural lands that surround the city from further conversion and urbanization by restricting future expansion of the Urban Limit Line, particularly if the Bailey Avenue Specific Plan is approved and moves forward in the future.

The Land Use Element states that the Urban Limit Line defines the ultimate edge of urban development within the City of Lompoc in order to: protect the natural features, scenic hillsides, and *agricultural economy of the community*; protect the health, safety, and welfare of community residents by directing development away from areas with hazards; and ensure that delivery of public services is provided in an efficient and cost-effective manner (emphasis added). The Land Use Element's Urban Limit Line definition states:

Areas inside the Urban Limit Line are suitable for the development of residential, commercial, industrial, mixed-use, and community facility land uses. Open space and recreational activities are suitable uses inside and outside of the Urban Limit Line. *Agricultural activities are permitted inside the Urban Limit Line as an interim use, pending urbanization. Long-term agricultural activities shall be outside of the Urban Limit Line. Urban development inside and adjacent to the Urban Limit Line shall be designed to incorporate buffer areas with trails or design features which serve to demarcate the urban edge of the community. Buffer areas should be at least 200 feet wide* (emphasis added).

It should be noted that this definition assumes that "agricultural activities are permitted inside the Urban Limit Line as an interim use, pending urbanization". Hence,

interim agricultural Land Use policies should be included in the Land Use Element to address these uses prior to their urbanization, as suggested in Item 2.

Additional policies that could be strengthened with regard to the protection of agricultural lands from conflicts with residential neighborhoods and vice-versa include the following:

Policy 2.2 The City shall protect residential neighborhoods from encroachment by adverse or incompatible non-residential uses (e.g. intensive agriculture or industry) and impacts associated with those nonresidential uses, including impacts to neighborhood character.

Policy 5.2 The City shall protect prime agricultural lands east of the City and west of Bailey Avenue.

Policy 5.3 To help preserve agriculture on a regional basis, the City shall encourage Santa Barbara County to protect the most productive agricultural soils (Class 1 & 2) in the Lompoc Valley and surrounding areas.

Policy 7.6 The City shall require provision of permanent buffer areas as part of new residential development adjacent to areas designated for agriculture. Such buffer areas are intended to provide a separation of uses and limit interference with agricultural activities while still providing for public safety.

Policy 2.2 states that the City shall protect residential neighborhoods from encroachment by adverse or incompatible non-residential uses. Policies 5.2 and 5.3 speak to the need to preserve agricultural uses outside of the City's boundaries. Policy 7.6 addresses the need to protect agriculture from the encroachment of these types of uses.

Although the Land Use Element's definition of the Urban Limit Line suggests a minimum 200 foot buffer on areas abutting it, more specificity on what can and cannot be placed in these buffers and permanent management of the buffers must be added as development standards to these policies. The above-noted policies highlight the need to carefully define how to use buffer zones as transitional areas. These policies should also include specific buffer *requirements* (a minimum of 200 feet) that define how buffers shall be utilized for all discretionary development projects with the potential to encroach into the vicinity of agricultural uses on or outside the Urban Limit Line. As described above in Item 1 and in Exhibit 1, provisions should be included to require any encroaching discretionary development to supply minimum buffer zones. An example of a dispute resolution procedure in the event of conflicts between these uses has also been provided in Exhibit 1, and could be considered for incorporation into the City's Land Use Element.

Furthermore, the EIR should provide a thorough analysis on the potential buildout of the GP and how it would potentially affect agricultural land conversion and conflicts,



the Urban Limit Line, and open space in the City. The EIR should also address the associated mitigation measures for these issues and clearly identify them as items that must be addressed in the Phase II Conservation and Open Space elements of the GP.

The following proposed Policy addresses the need for the City to maintain groundwater recharge and potentially “incompatible” uses:

Policy 5.1 The City shall maintain Open Space designations for areas used for the preservation of scenic beauty, natural resources, or outdoor recreation; or the managed production of resources, including groundwater recharge; or the protection of public health & safety. Groundwater recharge areas shall be protected from incompatible uses that would substantially inhibit aquifer recharge or degrade groundwater quality.

It is critical that the EIR for the GP update include an analysis of a potential groundwater overdraft situation and the impacts it would have on agricultural uses. An analysis of the potential conflicts and competition with water use associated with the future buildout of the GP (urbanized uses such as commercial and residential) should also be included.

4. Certain implementation measures contained in the Land Use Element of the GP should be carefully considered with regard to their potential to permanently convert agricultural lands into urbanized uses.

Several measures in the Land Use Plan have the potential to permanently convert agricultural and/or open space lands into urban uses. For example, Measure 26 requires the completion of an annexation study to identify potential lands for additional future industrial and manufacturing uses. The parameters of this implementation measure should be clearly defined in the Land Use Element, and the study should be required to specifically *avoid the inclusion of the following land uses as potential annexation areas*:

- Agricultural areas, particularly those in active agriculture with prime soils;
- Open space areas that serve as groundwater recharge or habitat areas; and
- Areas that have been determined important transition zones between open space, agriculture, and more urbanized uses within the City limits in the Phase II open space or conservation elements.

Further, this annexation study should be completed prior to updating the GP, since there is potential for environmental impacts from proposed annexations.

Measure 4 encourages the City to work with Federal, state, and regional agencies to widen Robinson Bridge on Highway 246. There is great potential for this project to impact and permanently convert agricultural lands, and this impact should therefore be analyzed extensively in the EIR.

Measure 35 (from the Circulation Element) requires that an economic impact study shall be undertaken prior to funding construction of the Central Avenue Extension to study the potential economic effects on the Old Town and other areas of the City. This implementation measure should also be reviewed for potential impacts to agriculture to the east of Central Avenue and open space in the EIR, including impacts to the Santa Ynez River. The study should also include consider as an alternative upgrading existing bridges to improve safety in the City if the impacts of construction of the Central Avenue Extension are deemed significant. Additionally, the secondary impacts of buildout of the Central Avenue Corridor if the extension is approved should be considered in the EIR.

### **Conclusion**

The recommendations contained in this letter are intended to serve as suggestions for strengthening policies and actions in the GP update that can support the goal of long-term preservation of agriculture and the urban limit line in the City of Lompoc and nearby unincorporated areas of Santa Barbara County, and to shape the scope of the upcoming EIR analysis on the Phase I GP Elements. To recap, the following items are suggested:

- Adding policies to the GP that address the need to confine growth within the City's boundaries. Growth of the City near its boundaries should be carefully controlled so it does not conflict with uses outside of its boundaries (e.g., agriculture).
- The need for the City to plan for interim agricultural uses within City's boundaries prior to buildout of proposed Land Uses in the GP.
- The need to update all related elements of the GP together.
- Recommendations for strengthening specific policies in the current draft Land Use Element to help protect agricultural lands and more urbanized uses from potential conflicts, and to preserve the Urban Limit Line of the City.
- The need to carefully consider the impacts of particular implementation measures contained in the Land Use Element of the GP with regard to their potential to permanently convert agricultural lands into urbanized uses.

The OPEN project team appreciates the opportunity to provide comments on the GP, and looks forward to working with interested stakeholders in effecting the recommendations contained in this letter.

Sincerely,

*Via E-mail*

Christina E. McGinnis, project planner

**Exhibit 1: City of Davis Right to Farm Ordinance and Dispute Resolution Procedures**

40A.01.050 Agricultural buffer requirement.

(a) In addition to the right to farm deed restriction and notice requirement, the city has determined that the use of property for agricultural operations is a high priority. To minimize future potential conflicts between agricultural and nonagricultural land uses and to protect the public health, all new developments adjacent to designated agricultural, agricultural reserve, agricultural open space, greenbelt/agricultural buffer, Davis greenbelt or environmentally sensitive habitat areas according to the land use and open space element maps shall be required to provide an agricultural buffer/agricultural transition area. In addition, development limits or restricts opportunities to view farmlands. Public access to a portion of the agricultural buffer will permit public views of farmland. Use of nonpolluting transportation methods (i.e., bikes), and use of the land to fulfill multiple policies including, but not limited to, agricultural mitigation and alternative transportation measures meets the policy objectives of the Davis general plan. The agricultural buffer/agricultural transition area shall be a minimum of one hundred fifty feet measured from the edge of the agricultural, greenbelt, or habitat area. Optimally, to achieve a maximum separation and to comply with the five hundred foot aerial spray setback established by the counties of Yolo and Solano, a buffer wider than one hundred fifty feet is encouraged.

(b) The minimum one hundred fifty foot agricultural buffer/agricultural transition area shall be comprised of two components: a fifty foot wide agricultural transition area located contiguous to a one hundred foot wide agricultural buffer located contiguous to the agricultural, greenbelt, or habitat area. The one hundred fifty foot agricultural buffer/transition area shall not qualify as farmland mitigation pursuant to article III of this chapter.

(c) The following uses shall be permitted in the one hundred foot agricultural buffer: native plants, tree or hedge rows, drainage channels, storm retention ponds, natural areas such as creeks or drainage swales, railroad tracks or other utility corridors and any other use, including agricultural uses, determined by the planning commission to be consistent with the use of the property as an agricultural buffer. There shall be no public access to the one hundred foot agricultural buffer unless otherwise permitted due to the nature of the area (e.g., railroad tracks). The one hundred foot agricultural buffer shall be developed by the developer pursuant to a plan approved by the parks and community services director or his/her designee. The plan shall include provision for the establishment, management and maintenance of the area. The plan shall incorporate adaptive management concepts and include the use of integrated pest management techniques. The property shall be dedicated to the city in fee title, or, at the discretion of the city, an easement in favor of the city shall be recorded against the property, which shall include the requirements of this article.

(d) The following uses shall be permitted in the fifty foot agricultural transition area: bike paths, community gardens, organic agriculture, native plants, tree and hedge rows, benches, lights, trash enclosures, fencing, and any other use determined by the planning commission to be of the same general character as the foregoing enumerated uses. There shall be public access to the fifty foot agricultural transition area. The fifty foot agricultural transition area shall be developed by the developer pursuant to a plan approved by the parks and community services director or his/her designee. Once the area is improved, approved, and accepted by the parks and community services department, the land shall be dedicated to the city.

(e) The city reserves its right to form a special benefit assessment district, or other applicable district as is permitted under state law, and to maintain the agricultural buffer and transition area once the land is improved, dedicated, and annexed.

(Ord. No. 1823, § 1 (part); Ord. No. 2300, § 2, Amended 11/27/2007)

**The City of Davis' Dispute Resolution Ordinance:**

40A.02.020 Resolution of disputes.

(a) The city shall establish a grievance procedure to settle any disputes or any controversy that should arise regarding any inconveniences or discomfort occasioned by agricultural operations which cannot be settled by direct negotiation of the parties involved. Either party shall submit the controversy to a hearing officer as set forth below or to community mediation services, if agreed to by the parties, in an attempt to resolve the matter prior to the filing of any court action.

(b) Any controversy between the parties shall be submitted to the hearing officer within ninety days of the later of the date of the occurrence of the particular activity giving rise to the controversy or the date a party became aware of the occurrence.

(c) The effectiveness of the hearing officer for resolution of disputes is dependent upon full discussion and complete presentation of all pertinent facts concerning the dispute in order to eliminate any misunderstandings. The parties are encouraged to cooperate in the exchange of pertinent information concerning the controversy and are encouraged to seek a written statement from the agriculture commissioner as to whether the activity under dispute is consistent with adopted laws and regulations and accepted customs and standards.

(d) The controversy shall be presented to the hearing officer by written request of one of the parties within the time limit specified. Thereafter the hearing officer may investigate the facts of the controversy but must, within twenty-five days, hold a meeting to consider the merits of the matter and within five days of the meeting render a written decision to the parties. At the time of the meeting both parties shall have an opportunity to present what each considers to be pertinent facts. No party bringing a complaint to the hearing

officer for settlement or resolution may be represented by counsel unless the opposing party is also represented by counsel. The time limits provided in this subsection for action by the hearing officer may be extended upon the written stipulation of all parties in a dispute.

(e) Any reasonable costs associated with the functioning of the hearing officer process shall be borne by the participants. The city council may, by resolution, prescribe fees to recover those costs. (Ord. No. 1823, § 1 (part).)

**Exhibit 2: Example Greenbelt agreements for the City of Santa Maria and City of  
Guadalupe**

RESOLUTION NO. 94-9

A RESOLUTION OF THE CITY COUNCIL OF THE CITY  
OF SANTA MARIA ESTABLISHING A GREENBELT AND  
URBAN DEVELOPMENT BUFFER POLICY TO PRESERVE  
PRIME AGRICULTURAL LAND

WHEREAS, a greenbelt can be defined as an area consisting  
of prime agricultural or other open space land, as defined in  
Section 56064 of the Government Code, which should be used to  
preserve agricultural or other open space land uses; and

WHEREAS, the City Council of the City of Santa Maria  
chooses to preserve open space and agricultural uses adjacent to  
the city; and

WHEREAS, the agricultural areas containing generally  
prime soils situated generally East of the City of Santa Maria,  
South of East Main Street and North of Prell Road and West of the  
City of Santa Maria; South of the San Luis Chispo County Line and  
North of Stowell Road, (see Exhibit A) are difficult for the City  
to service with sewers, water, police, fire protection and other  
Municipal services and is now devoted to intensive agricultural  
pursuits; and

WHEREAS, the City's General Plan states that new urban  
land uses should not be permitted on prime agricultural land; and  
these areas are also excluded from the City's Sphere of Influence;  
and

WHEREAS, the preservation of these areas for agricultural  
pursuits and open space will assist in controlling the conversion  
of agricultural land to urban uses and in defining the community  
identity and character.

NOW, THEREFORE, IT IS HEREBY RESOLVED the City Council of  
the City of Santa Maria does hereby declare:

- (1) That the lands in these areas are worthy of retention in  
agricultural and other open space uses for the overall best  
interests of the City, County and the State;
- (2) That the non-urban development areas identified on Exhibit A  
of this resolution shall not be annexed or developed and shall  
be retained as agricultural and open space uses;
- (3) That the Local Agency Formation Commission endorses this  
Greenbelt Policy and shall continue to act in a manner  
consistent with the preservation of the described lands for  
agricultural and open space purposes.

Dec 08 03 08:45a City of SM-Planning 1005/2507/2008

The City Clerk of the City of Santa Maria is hereby directed to send a copy of this resolution to the Local Agency Formation Commission, the County of Santa Barbara and the City of Guadalupe and request that these agencies adopt a similar resolution.

PASSED AND ADOPTED at a regular meeting of the City Council of the City of Santa Maria held January 4, 1994.

/s/ GEORGE S. HOBBS, JR.  
Mayor

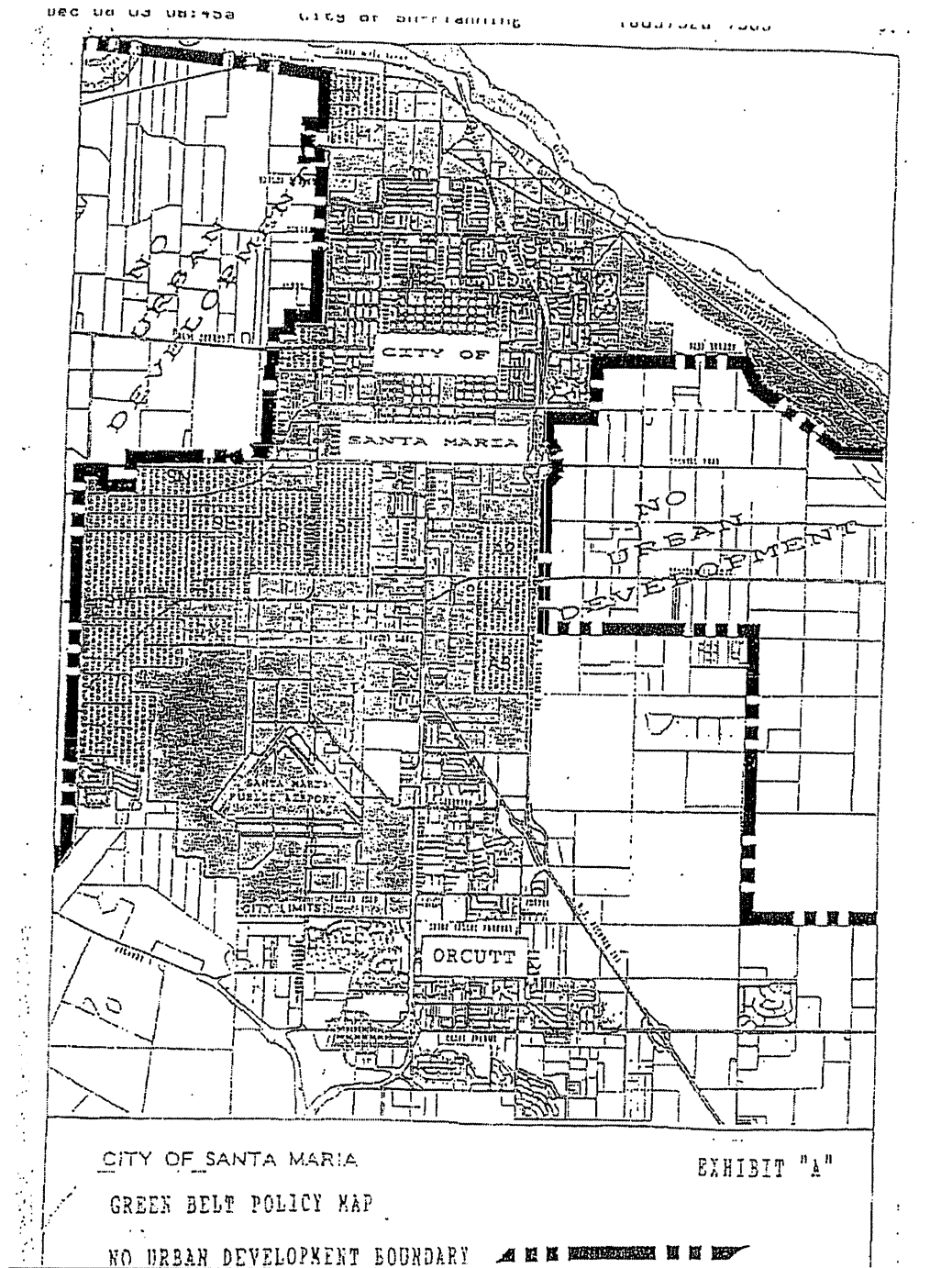
Attest:

/s/JANET KALLAND  
City Clerk

APPROVED AS TO FORM:  
BY: [Signature]  
CITY ATTORNEY

CONTENTS:  
BY: [Signature]  
DEPARTMENT HEAD  
BY: [Signature]

File: 249.1





DEC 08 03 08:46a

CITY OF SAN PABLO

10031228-1965

P. 9

RESOLUTION NO. 94-01  
A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF GUADALUPE  
ESTABLISHING A GREENBELT AND URBAN DEVELOPMENT  
BUFFER POLICY TO PRESERVE PRIME AGRICULTURAL LAND

WHEREAS, a greenbelt can be defined as an area consisting of prime agricultural or other open space land, as defined in Section 56064 of the Government Code, which should be used to preserve agricultural or other open space land uses; and

WHEREAS, the City Council of the City of Guadalupe chooses to preserve open space and agricultural uses adjacent to the City; and

WHEREAS, the city is surrounded by prime agricultural lands, most of which are under Williamson Act preservation contracts as shown on attached Exhibit A; and

WHEREAS, the city's general plan establishes a sphere of influence shown in attached Exhibit B which includes prime agricultural lands under Williamson Act preservation contracts; and

WHEREAS, the preservation of prime agricultural lands under Williamson Act contracts will assist in controlling the conversion of agricultural land.

NOW, THEREFORE, IT IS HEREBY RESOLVED the City Council of the City of Guadalupe does hereby declare:

- (1) That the lands under Williamson Act Contract shown in Exhibit A outside the sphere of influence boundary are worthy of retention in agriculture for the overall best interest of the city, county and state;
- (2) That the areas outside the sphere of influence (as adopted in the City of Guadalupe 1989 General Plan) shown on Exhibit B are prime agricultural land, most of which are under Williamson Act preservation contracts, shall not be annexed or developed and shall be retained as agricultural and open space uses;
- (3) That the Local Agency Formation Commission should endorse this Greenbelt Policy and shall continue to act in a manner consistent with the preservation of the described lands for agricultural and open space purposes.

PASSED, APPROVED AND ADOPTED this 24th day of January 1994.

  
Renaldo Pili, Mayor

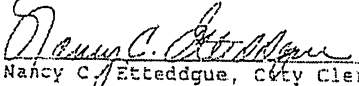
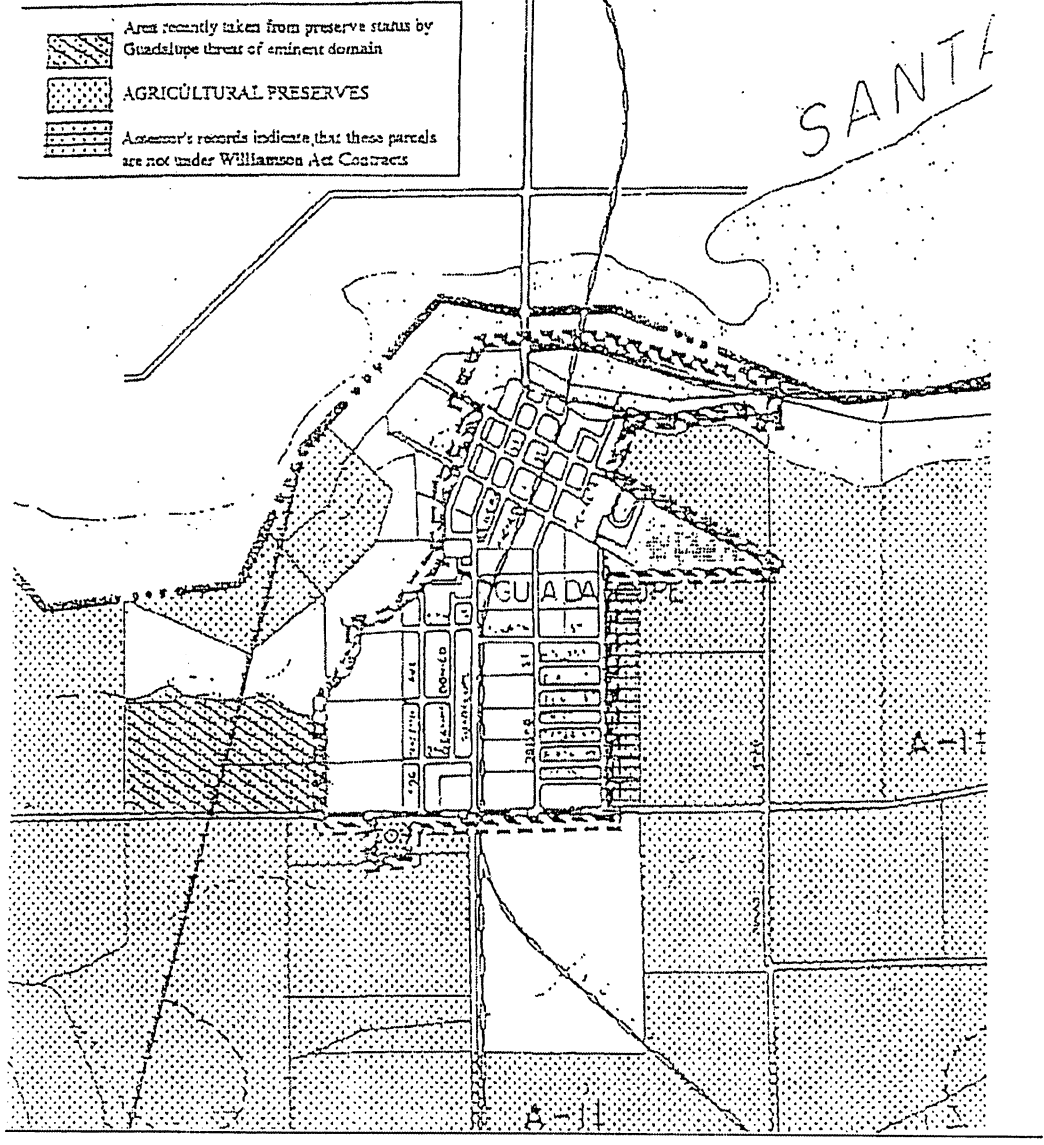
  
Nancy C. Ettedgue, City Clerk

EXHIBIT A  
WILLIAMSON ACT AREAS

AGRICULTURAL PRESERVE STATUS  
GUADALUPE AREA



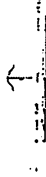
REG. NO. 03 08:478

LIST OF SUPPLEMENT

1803 928-758

P. 6

GUADALUPE  
 CALIFORNIA



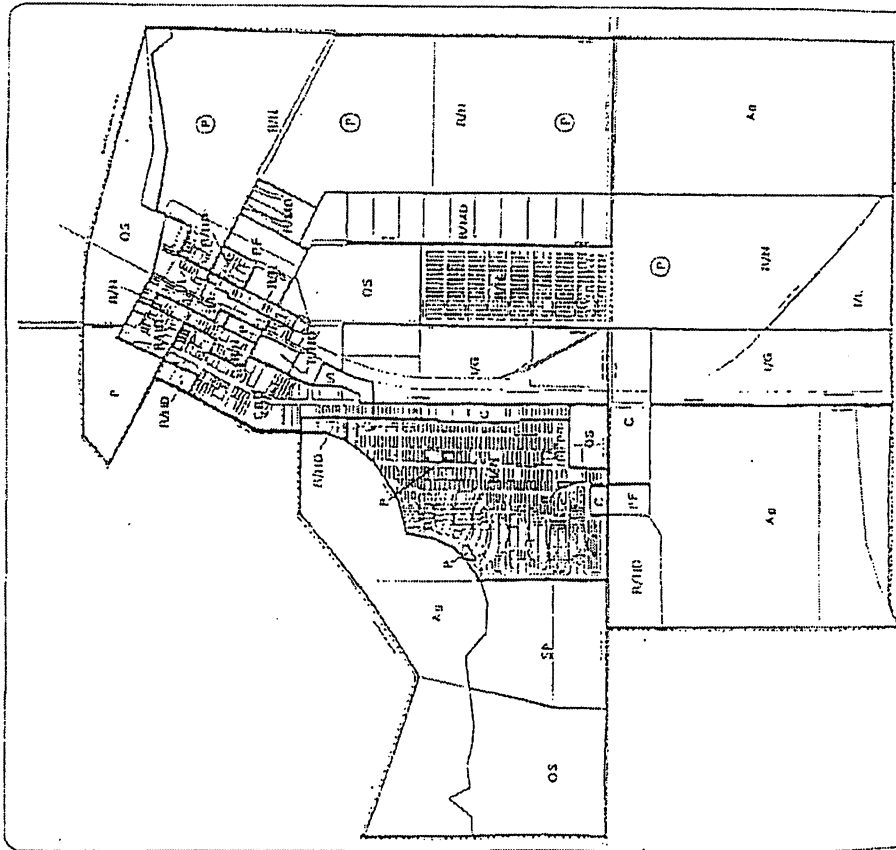
**EXHIBIT B**

**1989 General Plan  
 PROPOSED LAND USE MAP**

**LEGEND**

<b>IG</b>	General Industrial
<b>I/L</b>	Light Industrial
<b>C</b>	General Commercial
<b>CHD</b>	Central Business District
<b>R/HID</b>	High Density Residential 20 dwelling units per acre
<b>R/MID</b>	Medium Density Residential 10 dwelling units per acre
<b>R/N</b>	Neighborhood Residential 6 dwelling units per acre
<b>AG</b>	Agriculture
<b>OS</b>	Open Space
<b>PF</b>	Public Facilities
<b>P</b>	Parks
<b>(T)</b>	Tanks (location approximate)
<b>SP</b>	Specific Plan
---	Proposed Sphere of Influence Boundary

Figure III-2



Doc 08 03 08:46a

CITY OF GUADALUPE

COMMUNITY DEVELOPMENT

FEB 8 1994

(805) 343-1340

City of Guadalupe

918 Bishop Street  
GUADALUPE, CALIFORNIA 93434  
FAX (805) 343-6512

RECEIVED

FEB 8 1994

(805) 343-2391

COMMUNITY DEVELOPMENT  
DV. *Baldino*

*Bell*  
*John*  
*File*

February 4, 1994

RECEIVED

FEB 7 1994

*ANNEXATION*

CITY CLERK'S OFFICE

Mr. Bob Braitman  
LAFCo-Santa Barbara County  
105 E. Anapamu Street  
Santa Barbara, CA. 93101

RE: Greenbelt Agreement

Dear Mr. Braitman,

Enclosed is a certified copy of Resolution No. 94-01 of the City Council of the City of Guadalupe establishing a greenbelt around the city. This resolution was adopted by the City Council on January 24, 1994.

Thank you.

Sincerely,

*Nancy C. Bredt*  
Nancy C. Bredt  
City Clerk

cc: Janet Kalland, City Clerk  
City of Santa Maria

*Copy to: Mayor's Council  
City of Guadalupe*

# Summit View Homes, LLC

1240 Cougar Ridge Road  
Buellton, CA 93427  
805-688-7814

---

June 8, 2010

Planning Commission  
City of Lompoc  
100 Civic Center Plaza  
Lompoc, CA 93438

Subject: Lompoc General Plan Update EIR

Honorable Members of the Planning Commission:

On behalf of our project team, we would like to thank the City staff, Planning Commission, City Council and the City's consultant Rincon Consultants on preparing a very complete document to assist the City of Lompoc in navigating into the future.

We have prepared this comment letter to share our continued interest in possible future annexation and development of the "Wye Parcel" at the intersection of Harris Grade Road and La Purisima Road, APN 097-250-034, owned with our partners Dieter and Cathy Gruner.

Based on the detailed analysis contained in the DEIR, the moderate growth alternative with the land use and zoning for the Wye Parcel as medium or high density residential would minimize the potential environmental and other impacts associated with the High Growth Alternative for this site (visual, transportation, Odor (Air Quality), hazardous materials, land use compatibility, noise and utilities/ service systems). The jobs/ housing balance should still remain in the 1.02-1.03 range with this site being designated medium or high density residential (approximately 140 to 210 residential units).

Based on the housing needs for the City, there is a limited number of potential land for high density housing. Based on the 2008 Issue Paper on Housing, prepared by Rincon Consultants for the General Plan Update, there are only 7 acres currently available within the City for high density housing and 75 acres available for medium density housing. The Wye parcel is located at the corner of two busy arterials (south and west of the site) with commercial use (church) to the north and smaller lot residential units to the north/ east. This site should be considered for a higher density than the current density (low density) classification.

Once the DEIR is adopted, we would be very interested in discussing with the City which housing mix would be best for this site and proceeding with consideration of annexation into the City of Lompoc. We appreciate your consideration of this request.

Should you have any additional questions, feel free to contact us.

Sincerely,

*Stephen A. Orosz*

Stephen A. Orosz, P.E.  
Summit View Homes, LLC

## O.P.E.N.

Open-space Preservation Education Network  
A project of the Environmental Defense Center

June 16, 2010

Ms. Lucille Breese, Planning Director  
City of Lompoc Planning Department  
100 Civic Center Plaza  
Lompoc, California 93438-8001

### **Re: City of Lompoc Phase I General Plan Update, Environmental Impact Report (EIR)**

Dear Ms. Breese:

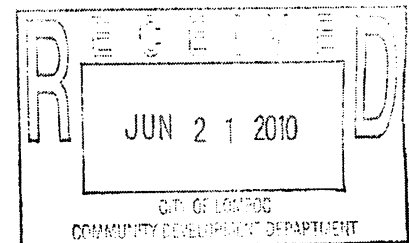
The following comments are submitted by the Environmental Defense Center (EDC) in response to the City's EIR for the General Plan Update as it relates to Bailey Avenue Specific Plan (BASP) project. This letter has been prepared as part of the Open-Space Preservation Educational Network (OPEN) program, which provides a proactive approach to assessing General Plans and the planning process throughout Santa Barbara County. The purpose of the OPEN project is to engage all interested sectors of our communities in a dialog about developing policies and programs to protect agricultural, open space lands, and the urban-rural interface.

The BASP project should be eliminated from the Phase I General Plan Update because it violates applicable State and County policy, and would result in an unnecessary significant and unavoidable loss of valuable agricultural resources. An overview of the specific planning and policy issues that the project would violate is provided below.

#### **Overarching Project Issues**

The BASP project would permanently convert approximately 270 acres of prime soils in active agricultural production in unincorporated Santa Barbara County, a portion of which is still under active Williamson Act contract[s], to urban uses. The Specific Plan area has been historically used for agricultural purposes, primarily as irrigated croplands (row crop and flower seed production). The BASP site is within Santa Barbara County's unincorporated area, and is zoned for agricultural uses ranging from AG-II-100 to AG-40 under the County's General Plan. The BASP site is currently used for agricultural production, with approximately 260 acres of prime farmland and 12 acres of unique farmland. The Bodger seed facility is located in the southern portion of the site, south of Ocean Avenue. The northern half of this site is currently under Williamson Act Contract (although this contract is proposed for non-renewal). The BASP project would set a bad precedent for unnecessary conversion of prime agricultural land to urban uses, as well as an improper and incompatible land use pattern of potential City expansion and annexation.

Current Land Use Designations for the BASP site are shown in Table 1 below.



**Table 1**  
 Land Use Designations on the Proposed Specific Plan Area

APN	Acreage	City Land Use Element	City Zoning	County Zoning
093-070-033	39.55	VLDR	N/A	AG-II-100 <sup>1</sup>
093-070-032	19.77	VLDR	N/A	AG-II-40 <sup>2</sup>
093-070-039	51.93	LDR <sup>3</sup>	N/A	AG-I-20 <sup>2</sup>
093-070-031		VLDR	N/A	AG-II-40
093-070-030		VLDR	N/A	40-AL-O <sup>4</sup>
093-090-026	60.10	VLDR	N/A	AG-II-40
093-111-007	98.39	VLDR	N/A	40-AG <sup>5</sup>
093-111-010		LDR	N/A	40-AG
093-111-008		LDR	N/A	40-AG
093-111-011		LDR	N/A	40-AG
093-111-009		LDR	N/A	40-AG
093-111-012		LDR	N/A	40-AG

- <sup>1</sup> Class II agricultural lands with a minimum parcel size of 100 acres
- <sup>2</sup> Class II agricultural lands with a minimum parcel size of 40 acres
- <sup>3</sup> Class I agricultural lands with a minimum parcel size of 20 acres
- <sup>4</sup> Limited agriculture district and oil drilling, minimum of 40 acres
- <sup>5</sup> Non-prime agricultural lands with a minimum parcel size of 40 acres
- <sup>6</sup> For Overlay

Source: Rincon Consultants, 2007.

Table 2 below provides an overview of proposed land uses for the BASP.

**Table 2: BASP Proposed Land Use Summary**

Land Use	Acres	% of Total	DUs/Net Acres	Maximum Dwelling Units	Total Population	Comments
Low Density Residential (LDR)	58	14%	2.3	62	237	795
Medium Density Residential (MDR)	126	36%	6.2	14.5	1,821	5,463
High Density Residential (HDR)	25	9%	14.5	21.8	594	1,566
Mixed-Use	11	4%	6	12	126	374
Public Facilities	2	1%				
Parks	24	9%				
Open Space (OS)	32	14%				
Major Circulation	8	3%				
<b>Total</b>	<b>271</b>	<b>100%</b>			<b>2,718</b>	<b>8,024</b>

1. DUs do not necessarily describe the number of Dwelling Units permitted on an acre of land less the area required for streets and public right-of-way.  
 2. Maximum dwelling units are based on gross acreage. The actual number of units will be based on net acreage as described in footnote #1.  
 3. Total Population is estimated at 2.97 people per household as indicated by Table 6 in the Lompoc General Plan.  
 4. The FAR indicates the maximum intensity of development on a parcel. The FAR is expressed as a ratio of building space to land area. A FAR of .50 was used to determine potential Floor Area or Commercial AF.

Source: BASP, RRM Design Group, 2008.

In order for the project to move forward, all land within the BASP area would require annexation and associated approval from the Local Agency Formation Commission (LAFCO) for Santa Barbara County. Proposed land use changes under the Specific Plan's buildout scenario would potentially affect agricultural areas *outside* of the City's GP and Sphere of Influence (SOI) area by introducing new higher-density residential and commercial uses likely to conflict with other agricultural activities abutting the Specific Plan area.

The EIR for the Phase I General Plan update now incorporates land use changes for the BASP area ("Area A"), and partially analyzes the impacts of potential annexation into the City for the area. However, the analysis and mitigation proposed in the EIR do not adequately assess all of the potential impacts of pre-zoning the BASP area for increased development. The BASP

project does not contain the appropriate level of proposed land use types to be considered for annexation into this portion of the City, for several reasons, as described in this letter. While it is acknowledged that Cities must plan for future growth during General Plan updates, this must be done while carefully considering the implications of expansion and annexation proposals.

The primary issues of concern related to the BASP project and the City's Phase I General Plan update include the following:

- The precedent that would be set by the BASP project for unnecessary conversion of prime agricultural land is of major concern, and would conflict with LAFCO's own policies for agricultural protection and the need to plan for orderly expansion of cities. It also conflicts with the County's agricultural protection policies.
  - The BASP project would create Class I, Significant and Unavoidable Impacts to Agriculture and Land Use. These impacts should not qualify for a Statement of Overriding Consideration because the project is entirely unnecessary to meet RHNA numbers or to serve the public good. Further, the BASP project has been incorporated into the GP update without proper analysis of the potential environmental impacts of the project.
- 1. The precedent for unnecessary conversion of prime agricultural land is of major concern, and would conflict with LAFCO's own policies for agricultural protection and the need to plan for orderly expansion of cities. It also conflicts with the County's agricultural protection policies.**

The BASP's proposed residential and commercial land uses are not consistent or compatible with existing or surrounding County zoning designations, violate the Agricultural Element's goals and policies of the County's General Plan, and would be incompatible with surrounding land use upon buildout. The following discussion of individual policy violations illuminates inconsistencies with existing Santa Barbara County General Plan and LAFCO policies.

The policies listed in the Santa Barbara County Agricultural Element do not support the conversion of prime agricultural land (particularly for AG-II land) into urbanized uses, nor do they allow for the introduction of conflicting land uses. Each of the following Agricultural Element policies would be violated if LAFCO and the County move forward with the BASP Specific Plan, and allow the land to be annexed into the City. Policy I.A. of the County's Agricultural Element states that the integrity of agricultural operations shall not be violated by non-compatible uses. The BASP project would violate this policy by expanding non-compatible urban development into and adjacent to active agricultural areas. Policy I.F. requires that 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.

906 Garden Street Santa Barbara, CA 93101 Phone (805) 963-1622 FAX (805) 962-3152

[www.edcnet.org](http://www.edcnet.org)



Most importantly, Goal II requires that agricultural lands shall be protected from adverse urban influences. The permanent conversion of prime agricultural land and the introduction of adverse urban influences would be in violation of this goal since the BASP would convert existing agricultural land into urban uses and would be located adjacent to agricultural land (after buildout).

Policy II.C requires that Santa Barbara County discourage the extension by the LAFCO of urban spheres of influence into productive agricultural lands designated Agriculture II (A-II) or Commercial Agriculture (AC) under the Comprehensive Plan. The proposed project must be discouraged to proceed as part of the City's General Plan update because it would introduce an urban sphere of influence into productive agricultural lands designated A-II.

The Santa Barbara County LAFCO is a state-mandated regulatory agency that provides assistance to citizens, cities, counties, and special districts regarding jurisdictional boundary changes. LAFCO provides policies to encourage urban growth and protect agricultural and open space areas from sprawl. In addition to its considerations of applicable Santa Barbara County policies and goals, LAFCO also has agricultural protection and annexation/SOI policies to which it must adhere. For example, LAFCO policies encourage the conservation of prime agricultural lands and open space areas, and discourage 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. [<http://www.sblafco.org/pol5.html>]. LAFCO policies also require that development shall be guided towards areas containing nonprime agricultural lands [<http://www.sblafco.org/pol5.html>]. The proposed BASP annexation conflicts with this policy because it would permanently convert prime and important farmland. LAFCO previously denied an application to annex the BASP area into the City's SOI. Further, the BASP area is not currently within the City's SOI. This information, together with the policy violations listed above, should result in denial of a SOI extension and annexation by LAFCO.

Policy II.D. of the Agricultural Element states that the conversion of highly productive agricultural lands, whether urban or rural, shall be discouraged. The economic value of the highly productive prime agricultural land that would be converted by the BASP land is apparent based on the returns reaped from current farming operations. An article in the Lompoc Record (Tayllor, July 2008) states the importance of the of the soils located on the site, noting that Mr. Wineman, a farmer of the land and landowner within the Specific Plan area, reported per acre total yields of about 57,000 pounds of broccoli and lettuce for this land. The article further quotes Mr. Wineman: "These favorable growing conditions do not exist throughout California or even the Lompoc Valley" (due to different microclimates). Mr. Wineman could not recall a crop failure due to weather, lack of water, disease or any other natural cause.

Goal III requires that where it is necessary for agricultural lands to be converted to other uses, this use shall not interfere with remaining agricultural operations. The introduction of

medium-density residential uses would interfere with remaining agricultural operations located adjacent to the BASP site.

*Policy III.A. discourages the expansion of urban development into active agricultural areas outside of urban limits as long as infill is available. The Phase I General Plan update and associated EIR for the City of Lompoc conclude that adequate housing sites are currently available to meet RHNA fair share requirements and that no Land Use Changes would be necessary as part of the update. The proposed BASP would be in direct violation of Policy III.A, since infill is available to meet necessary requirements for future growth of the City.*

Removing prime soils from agricultural production would conflict with County policies set forth in the Comprehensive Plan's Agriculture Element. Therefore, from a policy perspective, the current BASP violates both LAFCO and Santa Barbara County General Plan goals and policies and the project should not move forward as it is currently proposed, nor should it be incorporated into the General Plan update for a rezone. The BASP would permanently convert prime agricultural land into urbanized uses, and create a precedent for additional agricultural lands to be annexed into the City, fostering unneeded urban sprawl.

- 2. The project would create Class I, Significant and Unavoidable Impacts to Agriculture and Land Use. These impacts should not qualify for a Statement of Overriding Consideration because the project is entirely unnecessary to meet RHNA numbers or to serve the public good. The BASP project has been incorporated into the GP update without proper analysis of the potential environmental impacts of the project. There are significant, unmitigable impacts that must be disclosed and addressed prior to any consideration of the area's annexation or to incorporate anticipated zone changes that would allow for the BASP to move forward.**

The California Environmental Quality Act (CEQA) requires that the environmental impacts of a project be examined and disclosed prior to approval of a project. CEQA Guidelines Section 15091 provides the following guidance regarding findings:

- (a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
  - (1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
  - (2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

(3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.”

CEQA Guidelines Section 15093 provides the following additional guidance regarding a Statement of Overriding Considerations:

- (a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. *If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposal project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable"* (emphasis added).
- (b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.
- (c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

Class I impacts that have been identified in the EIR should not receive a Statement of Overriding Consideration (SOC) because the project is entirely unnecessary to meet RHNA numbers or to serve the public good. The City of Lompoc’s Planning Commission Staff Report for the General Update prepared by Lucille Breese, Planning Manager for the City, and Richard Daulton of Rincon Consultants (September 30, 2008), states: “**Based on a review of vacant and underutilized residential parcels in the City, the [Housing Element] report determines that the City maintains a sufficient current land inventory to address its RHNA goals without changes to existing General Plan and zoning designations (emphasis added).**” It also states: “land use strategies such as rezoning residential sites to higher densities are not necessary to demonstrate the City’s ability to meet its assigned share of regional housing needs due to the sufficient supply of existing residential land” (emphasis added). The BASP is a project that is not required for City growth, and clearly violates County General Plan and LAFCO policies with its inappropriate and unnecessary land use densities/designations and conversion of prime agricultural land, as described in Item 1 above.

The social and economic issues associated with the BASP project have serious potential to create a *negative* impact on the City; therefore the findings for a SOC cannot be made. The City of Lompoc has an excessive amount of currently vacant housing, as well as redevelopment and infill opportunities, and the BASP is entirely excessive in its proposal for 2,700+ housing units and 228,700 sq. ft. of commercial development. New commercial development is unneeded since there is an existing and ongoing high vacancy rate for businesses. During the June 9, 2010 City Planning Commission hearing, a Commissioner commented that there is currently 400,000 sq. ft. of vacant Commercial property within the City Boundaries. Planning for additional development and annexation of prime agricultural land that would expand the City where no expansion is warranted is a misappropriation of the General Plan update process, and would add financial strain on already-struggling business and home owners, as well as to the City. The SOC recommendation for incorporation of the BASP project zoning into the General Plan update is not supported by substantial evidence in the record.

Additionally, the single proposed mitigation (LU-3) in the General Plan EIR designed to address impacts to the loss of agricultural land would not reduce the identified significant impacts and would be entirely unenforceable, as well as unfunded. The proposed mitigation is as follows:

LU-3 Purchase of Agricultural Conservation Easements (PACE) Program.

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.

While the purchase of Agricultural Conservation Easements is a laudable goal, mitigation must be implementable and required on a project-specific basis. Mitigation measures must be known, specific, feasible, effective and enforceable.<sup>1</sup> Further, even if this mitigation was applied on a site-specific basis to the BASP project, it would not avoid a net impact of loss to the agricultural lands of the region. As Mr. Wineman points out, this land is unique and particularly fertile, and should be preserved.

**Additionally**, appropriate mitigation should be included to address land use impacts associated with the proposed annexation/expansion area. If mitigation measures are found to be

---

<sup>1</sup> Pub. Res. Code § 21081.6(b); CEQA Guidelines, §§ 15091(d), 15126.4(a)(2); *Federation of Hillside and Canyon Assns v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261 (agency must ensure that mitigation measures identified in the EIR will actually be implemented); *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645; *Napa Citizens*, supra, 91 Cal.App.4th 342.

infeasible, the EIR should contain a discussion of these measures and why they have been determined to be infeasible. Currently, there is no such discussion contained within the General Plan EIR.

CEQA Guidelines section 15125(d), which requires that an EIR discuss any inconsistencies between the proposed project and applicable general plans, must also be addressed.

The Staff report presented to your Commission states that “environmental review and public hearings will be held to evaluate the proposed Specific Plan after adoption of the General Plan Update but prior to City Council direction to proceed with the proposed Annexation”. However, the breadth of Class I impacts resulting from the BASP have not yet been fully analyzed in an EIR analysis, such as traffic impacts. For example, as stated in a CALTRANS comment letter on the BASP component of the General Plan:

“This project alone [BASP] will increase the City's housing stock by 19.2% and population by 18.2%. As indicated in the General Plan DEIR, there are many intersections on Ocean Ave and H St, which will suffer poor performance in the cumulative period, apparently without Area A included, specifically the left turning movements.”

It is entirely premature for the Commission and Council to pre-zone the BASP area as part of the General Plan update until all of the impacts of the project are understood. **Therefore, for the purposes of the General Plan update, the Commission should recommend that the City Council direct staff to initiate a request to move the Urban Limit Line to be consistent with the current City Limit Line, indicating no interest on the part of the City to develop in this area in the future (Option 3 in your Commission's Staff Report).** Pre-zoning to increase the density potential of the BASP site constitutes incentive for the creation of unnecessary urban sprawl on prime agricultural land and should be wholly discouraged. During the General Plan update process, the preservation of prime farmland should be a priority goal, as well as the consideration of the real economic and social need for a project.

#### Conclusion

The recommendations contained in this letter are provided for the City's consideration during the Phase I General Plan Update. The City must evaluate the BASP project carefully and determine whether it is appropriate and prudent to proceed with incorporating it into the General Plan update prior to full disclosure of its environmental impacts. To recap, the following items are suggested:

- The BASP project should not be incorporated into the Phase I General Plan update because it would conflict with LAFCO's policies for agricultural protection and the need to plan for orderly expansion of cities, as well as the County's agricultural protection policies as stated in the Agricultural Element of the General Plan.

906 Garden Street Santa Barbara, CA 93101 Phone (805) 963-1622 FAX (805) 962-3152

- The project would create Class I, Significant and Unavoidable Impacts to Agriculture and Land Use, which should not receive a Statement of Overriding Consideration because the project is entirely unnecessary to meet RHNA numbers or to serve the public good. Additional analysis of the potential environmental impacts of the project must be disclosed prior to a zone change for the site, and all feasible mitigation must be applied to reduce Class I impacts to a less than significant level.
- The Commission should direct staff to indicate to the City Council that no interest exists on the part of the City to develop in this area in the future, given the overarching issues with the BASP project from a policy and planning perspective.

The General Plan update is the time for the City to create a long-term vision for the community. The conversion of agricultural land for unneeded urbanized uses (such as the BASP project) is not consistent with sound planning practices for the City of Lompoc. The OPEN project team appreciates the opportunity to provide comments on the Phase I General Plan update, and looks forward to working with interested stakeholders in discussing the recommendations contained in this letter.

Sincerely,  
Via e-mail  
Christina E. McGinnis, M.U.P., OPEN Project Planner

*Edward S. Wineman  
Post Office Box 109  
Santa Maria, California 93456*

June 28, 2007

City of Lompoc  
100 Civic Center Plaza  
Lompoc CA 93438

RRM Design Group  
3765 South Higuera Street Ste 102  
San Luis Obispo CA 93401

Re: Bailey Avenue Specific Plan

Ladies and Gentlemen:

In 1939, my father purchased property in the Santa Maria Valley and began farming vegetables. By 1950, he wanted to expand his operation and was advised by a friend to consider the Lompoc Valley. He took this advice and purchased the Bissinger property located at the corner of Ocean Avenue & Bailey Avenue. He found that conditions in the Lompoc Valley were perfect for his crops. In later years, the family acquired more ground adjacent to the original purchase. After being released from the armed services in 1956, I took over the operation and continue to farm in both the Santa Maria & Lompoc Valleys today.

In the years past, I have grown sugar beets and dry edible beans as well as beans and flowers for seed crops. At the present, I am mostly farming vegetables such as broccoli, cauliflower, celery and lettuce. My experience has been that the quantity and quality of production from Lompoc will equal or exceed that from Santa Maria at any given time. I can not recall a crop failure due to weather, lack of water, disease or any other natural cause.

Approximately, 138 acres of my farming operation is included within the "Bailey Avenue Specific Plan." However, since some of this ground is used for roads and the railroad right-of-way, I actually farm closer to 125 acres. In the past few years, I have been rotating crops of broccoli and lettuce. There are usually two crops planted per year. Typically, my broccoli yields 800-25 pound cartons or 20,000 pounds per acre of crowns. In addition to the crowns, I cut florets which is another 2,000 pounds per acre. This is a total yield of 22,000 pounds per acre per planting. A field of lettuce will yield about 35,000 pounds of clean-cored product per acre per planting. I spend approximately \$4,000 per planted acre to harvest and market these crops and another \$3,500 to \$4,000 per planted acre to grow these crops at today's prices. About one-half of these costs are for labor, the rest is mainly for goods and services purchased locally. If you convert 270 acres of highly productive farm ground to residential use, you will have reduced the payroll producing capacity of the Valley by well over \$2,000,000. Granted, the people living in the new housing will be bringing some income to the Valley but there is a big difference. The farming industry provides a local economic base and creates wealth by converting natural resources into a valuable product. More wealth is created for the Valley every time a crop is planted. How is this wealth generating, job creating capacity going to be replaced?

It is not very likely that the Lompoc Valley itself is going to provide jobs for all these new residents. I would expect that many of these households will have to commute elsewhere for employment. How much is it going to cost us to provide additional roads in and out of the Valley? What impact will this increased traffic have on the quality of life here? Increased congestion and air pollution comes to my mind. In addition, there will be an additional burden placed on the community in terms of required public services. While some of this will be recovered by up front fees, in the long run, a residential development does not fully pay for the expansion of services it requires. Contrast that to my farm ground which pays much more in taxes than it requires back from the public.

What makes my Bailey Avenue farm so productive is the unique combination of soils, water and microclimate that exist in that particular location. The soil is all Class One Agricultural, the best there is. It is just right for growing vegetables, particularly the leafy, green vegetables that are used in prepared salad mixes which are an increasingly popular choice for consumers. These favorable growing conditions do not exist throughout California or even the Lompoc Valley. To the west, the soils are of poorer quality, the water has more salt, and it is colder. To the east side of town, it is too warm. Since these conditions can not be readily duplicated, I can not just take my operation anywhere and continue to produce the same volume of high quality produce that I can at this location. If we continue the trend of covering up our prime coastal valley farm ground with houses, how long will it be before popular demand for these food products exceeds our capacity to produce them? Shouldn't we be concerned about a supply of nutritious, safe food?

If we let the outside developers move in and build their houses, they will take their profits elsewhere and leave the Valley residents a higher tax burden. They won't be around to deal with the problems this development will eventually create. I believe that all of these economic and social issues should be taken into consideration in the Environmental Impact Report. If this prime agricultural ground is going to be taken out of production, shouldn't there be a requirement to bring new land into production that has an equivalent amount of productive capacity?

Sincerely,

  
Edward S Wineman

415 Wineman Rd, Lompoc, home phone 920-5197



July 14, 2010

TO: CITY OF LOMPOC PLANNING COMMISSION MEMBERS  
CITY OF LOMPOC PLANNING MANAGER: LUCILLE BREESE  
GP UPDATE CONSULTANT: RINCON CONSULTANTS, INC.  
MAYOR OF CITY OF LOMPOC  
CITY OF LOMPOC COUNCIL MEMBERS

SUBJECT: LOMPOC GENERAL PLAN UPDATE EIR  
BAILEY AVENUE...AGRICULTURE OR URBANIZATION?

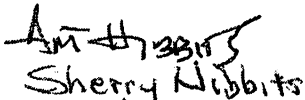
We strongly recommend that you support the continuation of Agriculture, west of the existing City limits, and to take all steps necessary to prevent any further expansion of any and all urban uses in the area known as the Bailey Avenue Corridor.

Specifically, please remove from your GP revisions and related EIR documents, anything that would encourage the expansion of the City of Lompoc, westward, from its existing limits, into the rich, highly productive, and historically farmed lands of the lower Lompoc Valley.

In addition, please reaffirm your City's previous policy with reference to protecting Agriculture in the areas surrounding our City. The many, long range, economic and environmental benefits, accruing from our Valley's diverse Agriculture Industry, have been well stated, numerous times before. Please refer to the attached letter from Edward S. Wineman, a major landowner in the proposed annexation area

Thank you for your consideration.

Sincerely,

  
Sherry Hibbits

ART and SHERRY HIBBITS  
1251 E. Highway 246  
Lompoc, Calif. 93436

**Janice Keller**  
P.O. Box 504  
Lompoc, CA 93438-0504  
(805) 735-1408

July 14, 2010

Lompoc Planning Commission  
100 Civic Center Plaza  
Lompoc, CA 93436

RE: GP 07-04 – Comprehensive General Plan Update

Dear Commissioners,

I have reviewed the agenda and the staff report with its attachment for the Planning Commission meeting of July 14, 2010. It seems to me that the agenda and the staff report do not coincide as to what you will be doing at the meeting of July 14, 2010.

That being said, since the Planning Commission already has voted to forward the FEIR to the City Council with a recommendation for them to certify the document, I am concerned about revised Figure 4.13-7 and what it means. Is the Central Avenue Extension still part of the recommendations in the General Plan Update? Is it the Planning Commission's recommendation that the City Council consider it? If not, why is this figure included? As I have repeatedly stated, the Central Avenue Extension is a misguided concept which is not necessary and which will disrupt farming activity east of the City.

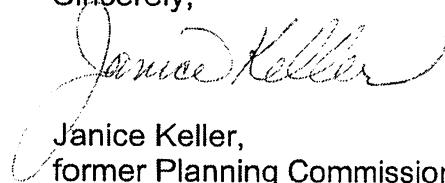
As for the four expansion areas which you will be discussing at the meeting, you should be well aware by now that I and many other Lompoc area residents oppose any extension of the Urban Limit Line and/or the Sphere of Influence to include prime agricultural lands in the Bailey Avenue Corridor. Following, in no particular order, are a few of the many reasons for my opposition to the proposed expansion:

1. Contrary to the apparent wishes of the Executive Director of LAFCO, LAFCO, Santa Barbara County and the City of Lompoc all have policies in place to protect prime agricultural land from urban development.
2. Expansion, with its large potential for new housing and population growth, will put an added burden on our already strained Police and Fire Departments and other City services.
3. There is no urgent need to expand onto prime agricultural land. There is already enough land within the existing City boundaries to meet the current and projected future Regional Housing Needs Assessment (RHNA) numbers for the next ten years. Furthermore, any argument you might hear that infill is hampered by the State's imposition of requirements that runoff be contained within a site is bogus. Housing is being built on infill sites elsewhere in the County without a problem – it just takes creativity and a desire to do so.

4. Lompoc and many of its residents, like much of the rest of the world, are currently experiencing financial uncertainty. There is no clear prediction on when this will change. There are many, many houses on the market. Property values are low. Let's not make the situation worse by designating more land outside the present City boundaries for housing and other urban development.
5. Prime agricultural land in California and elsewhere is shrinking, but the population continues to grow. From where and at what cost will we get our food in the future?

Finally, if the Planning Commission recommends expansion into any of the four areas proposed, I recommend that you adopt a policy that any development in those areas be contiguous to areas which are already developed, i.e. start building next to where there is existing infrastructure and services, not at the farthest reaches of the expansion area.

Sincerely,

A handwritten signature in cursive script that reads "Janice Keller". The signature is written in black ink and is positioned above the printed name and title.

Janice Keller,  
former Planning Commissioner  
and City Council Member

July 14, 2010

City Lompoc

Planning Commission

Bailey Avenue Extension

Dear Sirs:

I am a farmer west of town, but I do not have a direct in any of the farmland. Prime agricultural farmland is rare and getting rarer. It has been given protection similar or the same as environmental assets. This land deserves the same protection. Once lost, it is unrecoverable.

I understand the desire to develop farmland. There are no recognized environmental offsets. It is easy to build. The water issue of development can be offset by the reduction in farming. Sounds wonderful, but it is wrong. It is an easy out, but should be avoided at all costs.

Yours truly,



Steve Jordan

Baroda Farms.