



MEMORANDUM
COMMUNITY DEVELOPMENT DEPARTMENT
Planning Division

DATE: August 26, 2019

TO: Dan Klemann, Deputy Director
Santa Barbara County Long Range Planning Division

FROM: Brian Halvorson, Planning Manager

SUBJECT: City of Lompoc Bailey Avenue Sphere of Influence and Annexation Proposal
Response to Santa Barbara County Long Range Planning Division Review
(Preliminary Comments)

The City of Lompoc staff has prepared a response and provided supplemental information regarding comments received in a Memorandum dated September 28, 2018 (Attachment 1) and a meeting held with County Planning staff on October 1, 2018 regarding Lompoc's Bailey Avenue Sphere of Influence (SOI) and Annexation proposal.

The City of Lompoc submitted an application to LAFCO to amend its SOI and Annex the Bailey Avenue properties which was received by LAFCO on July 26, 2018. The purpose of this memo is to clarify the City's intent of the SOI/Annexation proposal, answer questions posed in your memo, and provide new information that the County has not received nor considered in its preliminary review of this project. After you have received our response, the City is requesting a second meeting with County Planning staff and a subsequent official comprehensive review of the proposed project since our application to LAFCO was previously submitted.

Subject Properties

No change in the location of the Annexation Areas or project site APN's or property ownership is proposed at this time. The City can provide further documentation on the legal status and the number of legal lots that exist in Areas A and B upon further coordination with the County for this project.

Site Description

In regards to documentation of the legal status of the subject parcels; maps and legal descriptions were submitted as part of the City's application submitted to LAFCO on July 26, 2018.

Currently, we are coordinating with LAFCO and the County Public Works Department to address corrections received from E. Tenell Matlovsky on September 20, 2018 to address corrections to legal descriptions and clarify boundaries and closure calculations for the subject properties. No changes to ownership of the subject parcels have occurred since the LAFCO application was submitted and if requested, copies of Grant Deeds and/or a current Title Report for the subject parcels will be provided to LAFCO.

Proposed Project

The proposed project was summarized correctly (General Plan Amendment/Zone Change) and associated environmental documentation with the City as lead agency. It does not include a Development Review process since the City has not received a formal submittal by the property owner/applicant of development plans (site, grading, elevation and landscaping plans) which requires Design Review Board (DRB) and Planning Commission/Council review of the proposed project.

LAFCO Project History

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

Since this denial much has changed. The City has made significant efforts in the area of in-fill development and providing significant additions to local employment. In addition, new General Plan Policies, Goals and Implementation Measures have been adopted in the 2030 General Plan encouraging and protecting agricultural lands west of Bailey Avenue (Attachment 3).

As recommended by LAFCO, Lompoc has guided development away from prime agricultural land and subsequently approved the Burton Ranch Specific Plan (149 acres), Briar Creek (77 acres), Crown Pointe (29 acres), River Terrace (26 acres), Crown Laurel (11 acres), Summit View (10 acres), Coastal Meadows (3 acres) and the Central Coast Business Park (40 acres) areas which demonstrate Lompoc's efforts to steer development within areas of the City that are not located on prime farm land.

Furthermore, the State and Santa Barbara County are experiencing a significant housing crises that needs attention immediately with the goal of accelerating housing production. With the proposed project, Lompoc can do its part to help alleviate this crises.

Preliminary Policy Consistency (Santa Barbara County Comprehensive Plan)

The City of Lompoc appreciates and has considered County Comprehensive Plan goals and policies referenced in your memo relating to the intent and protection of agricultural resources and has provided a response to this issue area but we respectfully disagree that land to be incorporated into the Lompoc City Limits must comply and be consistent with

County Comprehensive Plan goals and policies. (Gov. Code section 56375(a)(7).) ["The decision of the commission with regard to a proposal to annex territory to a city shall be based upon the general plan and rezoning of the city".]

The City's recently updated (2013) Land Use Element and Conservation/Open Space Element already provide ample protection to agricultural resources as further described in the General Plan discussion below. Moreover, upon Annexation of the Bailey Avenue properties, Lompoc General Plan consistency would be achieved.

Furthermore, the proposed sphere expansion and annexation should be viewed in light of LAFCO's enabling statute, specifically Government Code Section 56668 which states that "Factors to be considered in the review of a proposal shall include, but not limited to... The proposal's consistency with city or county general and specific plans."

From LAFCO's statutory perspective, though the County general plan is a factor to be considered, LAFCO's annexation decision must be based on consistency with the city's general plan. (Gov. Code section 56375(a)(7).

The proposed project complies with the following **City of Lompoc 2030 General Plan Land Use Element goals, policies, and implementation measures** relating to the protection of agricultural resources:

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.*

City Policy Consistency Analysis: The Bailey Avenue Sphere of Influence and Annexation proposal has come at a time where the City of Lompoc has previously and continuously directed growth away from agricultural areas (which is also in accordance with direction received from LAFCO in 1998). These areas include to the north (i.e. Burton Ranch and Summit View) as well as along the eastern and western perimeter of the City (i.e. River Terrace, Coastal Meadows projects). As part of an update to the Lompoc General Plan Land Use Element and to encourage infill development consistent with Land Use Element Policy 1.3, the City also adopted the H Street (Highway 1) Corridor Infill area (Attachment 4) which aims to encourage development (Land Use Element Policy 1.7) of vacant or underutilized properties in this corridor and provide the greatest opportunity for key infill projects. Furthermore, even decades before Policy 1.3 was adopted by the City, no annexations on agricultural land have occurred along the eastern perimeter of the City since the mid 1980's.

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

City Policy Consistency Analysis: The City of Lompoc updated its General Plan Land Use Element in 2013 which was reviewed by Santa Barbara County and LAFCO. As part of this update, the City clearly defined an Urban Limit Line as part of its adopted Land Use

Element Map (Attachment 2). The Urban Limit Line established the ultimate edge of urban development within the City (Land Use Element Policy 1.2) and the development of the Bailey Avenue properties align with this Urban Limit Line as the project is located inside said line and contains adjacent infrastructure (water/sewer) to efficiently utilize for the proposed development.

City Policy 1.6: *Areas identified by the City for potential annexation are depicted on Figure LU-1 as areas where the Urban Limit Line exceeds the City Limit Line. These lands include: Expansion Area A-the Bailey Area Specific Plan Area.*

City Policy Consistency Analysis: In accordance with adopted Policy 1.6, the City of Lompoc has submitted an application (July 26, 2018) to LAFCO to Annex the Bailey Area in accordance with planned growth areas as described in Land Use Element Policy 1.6.

City Policy 5.2: *The City shall protect prime agricultural lands east of the City and west of the Urban Limit Line.*

City Policy Consistency Analysis: The proposed project is located east of the City's Urban Limit Line and therefore protects prime agricultural lands that are not already planned for orderly, and efficient urbanization.

City 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.*

City Policy Consistency Analysis: The City supports agriculture in the Lompoc Valley and recently commented and attended on July 11, 2019 a LAFCO meeting regarding potential amendments to the Agriculture/Open Space policies that the City currently supports (with minor revisions). In addition, the City amended its Conservation/Open Space Element encouraging agricultural easements.

City Goal 7: *Protect and encourage agriculture and agricultural-support businesses.*

City Policy Consistency Analysis: The City of Lompoc continues to support and encourage agricultural businesses through a variety of efforts including yearly festivals, farmers markets, local and County fairs, educational programs, and trade shows. In addition, the Lompoc Valley has an extensive history of supporting the flower and seed industries.

City Policy 7.1: *The City shall assist agricultural-support businesses or value-added agriculture to expand and/or relocate in the Lompoc Valley.*

City Policy Consistency Analysis: The Lompoc Chamber of Commerce and the City's Community Development Department continues to assist the agricultural industry when expansions are anticipated or planned within the City Limits.

City Policy 7.2: *The City shall work with law enforcement agencies from Santa Barbara County to protect agricultural areas from theft and vandalism.*

City Policy Consistency Analysis: The City maintains a strong collaborative relationship with City and County law enforcement agencies regarding all matters related to theft and vandalism.

City Policy 7.3: *The City shall encourage agricultural education program conducted by local farming and community garden organizations.*

City Policy Consistency Analysis: The City Planning Division is currently in the process of completing a comprehensive update to its zoning code which will allow more flexibility (to be allowed in all zoning districts "by right") in the permitting process for establishing local farming such as community gardens within the City Limits.

City Policy 7.5: *The City shall protect and enhance the agricultural industry, as well as community gardens and other specialty crops that are unique to the region, through careful site design, agricultural buffers, and other design features intended to protect agriculture.*

City Policy Consistency Analysis: See response to City Policy 7.3 above. The proposed project would integrate a site design that encourages walking, incorporates connections to public transit and provides a 200-foot agricultural buffer (refer to Attachment 6) to protect agriculture located directly west of the project site.

City Policy 7.6: *The City shall require provision of permanent buffer areas as part of new residential development adjacent to areas designed 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.*

City Policy Consistency Analysis: The proposed residential project would comply with the required buffers adjacent to agriculture (see Attachment 8).

City Implementation Measure 3: The City shall require future development in the Bailey Avenue Corridor to coordinate installation of infrastructure, continuance of the existing, unbroken 200-foot buffer along the Bailey Avenue Corridor from North Avenue to Olive Avenue, and shall encourage interconnectivity, pedestrian and vehicular, between any future developments during the development review process.

City Policy Consistency Analysis: Compliance with this measure would be reviewed and conditioned through the development review process. The project would adhere to the City's Circulation Element and it should be noted that some of the public infrastructure (i.e. sewer) along Bailey Avenue was previously installed.

City Implementation Measure 6: The City shall contact private land trusts involved in the protection of agricultural land to pursue long-term protection of agricultural land within the Study Area.

City Policy Consistency Analysis: The City will pursue this process concurrently with the pending LAFCO application for the Bailey Avenue Annexation and SOI amendment.

Response to Preliminary Policy Consistency (County Comprehensive Plan)

County Agricultural Element

County GOAL I. *Santa Barbara County shall assure and enhance the continuation of agriculture as a major viable production industry in Santa Barbara County. Agriculture shall be encouraged. Where conditions allow, (taking into account environmental impacts) expansion and intensification shall be supported.*

City Response to County GOAL I.

Although the Bailey Avenue SOI expansion and Annexation proposal would remove agriculture land (148 acres) from the County, the enhancement and continuation of agriculture as a major and viable production industry in Santa Barbara County would still continue and be encouraged with over 66,969 acres of Prime Farmland currently located in Santa Barbara County (refer to Lompoc Land Use Element Policies 1.3, 1.4, 5.2, 5.3, Goal 7, Policy 7.5, 7.6 and Implementation Measure 3). As proposed, the Bailey Avenue proposal only makes up 0.002% of the total farmland in the Santa Barbara County. A strong case can be made that County Goal I is still upheld because the Goal does not include a quantitative analysis for when this Goal is specifically not met. If it did, it could be argued that removing 148 acres from the County Agricultural inventory would not further, or be inconsistent with this Goal. Therefore, until this Goal is quantified, City staff believes that County Goal I can still be met with the Bailey Avenue SOI expansion.

County Policy I.F. *The quantity 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.*

City Response to County Policy I.F

The quantity and availability of water, air, and soil resources and their protection were analyzed in a Final Environmental Impact Report (EIR 09-01) to the Lompoc General Plan Update certified by the Lompoc City Council on October 19, 2010. In addition, an Addendum to this EIR was completed in December 2016 to address minor changes proposed to the Bailey Avenue Corridor Annexation. Copies of both environmental documents were submitted on July 26, 2018 as part of the City's application to LAFCO to amend its SOI and Annex the Bailey Avenue properties. The 2030 Lompoc General Plan provides a stable Urban/Rural Boundary Line (referred to as the Urban Limit Line, Attachment 2) establishing the ultimate edge of urban development within Lompoc. The ULL allows the protection of natural features, scenic hillsides, agricultural economy of the community, protects the health, safety, and welfare of community residents by directing development away from areas with hazards and ensures that delivery of public services is provided in an efficient and cost effective manner. In addition, Lompoc Urban Design Element Implementation Measure 3, Policy 1.4, Lompoc Land Use Element Policy 7.5, 7.6, Implementation Measure 3, and Lompoc Conservation and Open Space Element Measure 29 address the use of permanent buffer areas (i.e.-200 feet along the Bailey Avenue Corridor) bordering agricultural uses and pesticide drift impacts. A conceptual map

showing how this buffer would be implemented with the proposed project is shown on Attachment 8. Currently, existing agricultural uses are in close proximity to a local school (Miguelito elementary, south of Annexation Area B, Bodger property) and residential uses (north and east of Annexation Area A, Bailey property). The City required buffer (which would include vegetation screening) would create a safer distance between these conflicting uses and protect public/health safety from impacts that may result from incompatible land uses. Therefore, the proposed project would comply with County Policy I.F with the implementation of City General Plan policies.

County GOAL II. *Agricultural lands shall be protected from adverse urban influence.*

City Response to County Goal II.

Refer to City Response to County Goal I and County Policy I.F. and Attachment 3.

County Policy II.C *Santa Barbara County shall discourage the extension by the Local Agency Formation Commission (LAFCO) of urban spheres of influence into productive agricultural lands designated Agriculture II (A-II) or Commercial Agriculture (AC) under the Comprehensive Plan.*

City Response to County Policy II.C

Refer to City Response to County Goal I and County Policy I.F. and Attachment 3.

County Policy II.D *Conversion of highly productive agricultural lands, whether urban or rural, shall be discouraged. The County shall support programs which encourage the retention of highly productive agricultural lands.*

City Response to County Policy II.D

The proposed project is consistent with this County Policy in that the City has adopted General Plan Policies in its Land Use Element to protect prime agricultural lands east of the City and west of the Urban Limit Line and also to help preserve agriculture on a regional basis (refer to Attachment 3).

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

City Response to County Policy III.A

The City of Lompoc has a Certified Housing Element which focuses on infill areas and has clearly delineated in the 2030 General Plan where the City will not grow (with an emphasis on agricultural protection).

In order to provide for the quantity of housing production currently needed for the State, the County and local communities, infill sites alone will NOT fulfill this need. In addition, over the last 20+ years' urban development in Lompoc has been directed to infill areas and has been away from active agricultural areas in accordance with this County Policy.

Although the Bailey properties are located on active agricultural areas, these properties are within the City Urban Limit Line (ULL) which defines the urban edge of Lompoc but allows agricultural activities as an interim use pending urbanization where long term agricultural activities shall continue outside the ULL. Furthermore, the properties to be annexed are no longer encumbered by Williamson Act contracts. Therefore, City staff believes the proposed project is consistent with this Policy as the City's General Plan was previously amended to discourage growth west of Bailey Avenue and therefore urban development would be contained and discouraged from growth onto active agricultural areas.

County Land Use Element

County Regional Goal Urbanization: *In order for the County to sustain a healthy economy in the urbanized areas and to allow for growth within its resources and within its ability to pay for necessary services, the County shall encourage infill, prevent scattered urban development, and encourage a balance between housing and jobs.*

City Response to Regional County Goal

The Bailey Avenue SOI and Annexation proposal includes planned and efficient urban development (not scattered) that is contiguous to existing urban development which can be served with nearby existing infrastructure and services (sewer/water/solid waste/electric) located within the City's adopted ULL.

Although the Bailey Avenue proposal may not be considered infill (since it is east of Bailey Avenue), the City has adopted and implemented goals and policies in the 2030 General Plan that continue to encourage infill development (such as the H Street Corridor In-Fill Area, Attachment 4). On the other hand, as previously mentioned, it should be recognized that housing goals set forth in population projections and allocations as directed by the Governor cannot be met by infill sites alone. Therefore, the proposed project is needed even if it may not technically be considered "infill".

In addition, Lompoc and the Lompoc Valley as a whole continue to add jobs with a current job total in 2010 of 10,697 (City) and 19,474 (Valley) with projected job growth (2014-2022) to increase by 837/1,173 respectively (SBCAG 2014-2022 Regional Housing Needs Allocation Plan). In a recent presentation by SBCAG last month (as part of the Sustainable Communities Strategy) to the Santa Barbara County Climate Collaborative, Lompoc's job/housing ratio was stated to be 0.74 which is very close to the desired SBCAG ratio range of 0.75 to 1.25.

Although the jobs/housing balance does not compare to cities such as Santa Barbara and Goleta, Lompoc continues to encourage and attract new jobs in the Medical sector (28,000 square foot medical clinic currently under construction and an expansion of the Lompoc Valley Medical Center), Education sector (Allan Hancock College) and a thriving Vandenberg Air Force Base which includes over 2,900 active military members and may be chosen (VAFB is among 6 finalists) for a planned U.S. Space Command operation in the near future. If chosen, this would have a significant impact on the base and will in turn affect the City of Lompoc from an employment and housing standpoint.

Although not required, the City also adopted an Economic Development Element as part of its General Plan update in 2015 in order to implement policies and measures to attract a higher percentage of job growth in the region. Lastly, although the proposed project may not include a job component, many employment opportunities are conveniently located in the City and within the Lompoc Valley that will serve the proposed project.

County Goal Section V (Area/Community Goals) for the Lompoc Area

- *The unique character of the area should be protected and enhanced with particular emphasis on protection of agricultural lands, grazing lands, and natural amenities.*
- *Residential, commercial and industrial growth should be confined to urban areas.*
- *Urbanization should remain within the City of Lompoc and designated urban portions of the Vandenberg Village/Mission Hills/Mesa Oaks areas.*
- *Prime agricultural lands should be preserved for agricultural use only. Preservation of lesser grades of presently producing or potential agricultural land should be actively encouraged.*

City Response to County Goal Section V

The City of Lompoc strives to protect its unique character such as agricultural lands, grazing lands and natural amenities.

This has been achieved by completing a comprehensive update to its 2030 General Plan that maps biological, irrigated soils/classifications and open space areas. Goals/policies/implementation measures were formulated that address biotic, cultural, soil/mineral, water resources, air quality, energy and open space resources and amenities.

In regards to residential/commercial/industrial growth being confined to urban areas and urbanization remaining within the City of Lompoc, the City's Land Use Element establishes Lompoc's vision and fundamental land use philosophy, including directing development to the most suitable locations. The adopted City Land Use Element focuses on logical, functional, and visually pleasing patterns that are consistent with local social values. The Bailey Avenue area is part of this vision/philosophy and is therefore included as Land Use Policy 1.6. This area is within the City's Urban Limit Line and therefore already designated for urbanization.

For urban portions of the Vandenberg Village/Mission Hills and the Mesa Oaks areas, these areas are not planned expansion areas (refer to Expansion Areas A/B/C/D in Policy 1.6) as described in the City's Land Use Element. On the other hand, the Burton Ranch Area (149 acres) was annexed in 2007 which is considered part of this geographical area as stated in this County Area/Community Goal.

As previously stated in this memo, prime agricultural lands may be preserved for agricultural use in the area west of the City's Urban Limit Line. This is an area where the City's goals/policies differ from the County but should not be interpreted as "inconsistent" as ultimately expansion areas/annexations would need to comply with Lompoc's 2030 General Plan. Nonetheless, Attachment 3 lists Lompoc 2030 General Plan Land Use Element and Conservation/Open Space Element Goals/Policies/Implementation

Measures supporting the protection of agriculture and planned urbanization of the Bailey Avenue properties.

Other Issues Considered

Demonstrated Housing Need

Although the City's Housing Element estimates a development capacity of approximately 1,831 units based on current land inventory, 1,173 or 64% of these units are entitled. This includes a substantial number of units encumbered that are not anticipated to be built in the next 5+ years due to a number of market factors such as projects entitled during an inflated market (prior to a recession), the potential need for costly redesign (to adjust to current market), and high utility infrastructure costs (i.e. Burton Ranch, 476 units). It should be noted that there are only 119 acres of vacant land (not 152 as stated in your memo) zoned for Low-Density residential use or 28 vacant parcels (not 36 as stated in your memo) as shown in Attachment 5. This would provide for approximately 415 residential units (not 564) which is not enough to meet current housing demands.

In short, even with the available inventory that Lompoc currently has, a housing shortage still exists in Lompoc. If housing continues to be built at a slow pace (which has currently been the trend the last 10+ years with an average of only 51 units/year), housing prices will continue to increase due to a lack of supply vs. demand. Since housing costs are substantially higher in areas outside of Lompoc, there is a high demand to build new housing in the Lompoc Market Area.

If California is going to keep up with the pace of demand for housing (and the 3.5 million units needed under the Governor's plan which includes \$750 million to support local planning efforts, incentivize and accelerate housing production) then Lompoc must have a more aggressive strategy for the ability to add more housing units and consider the Bailey Avenue properties as part of its local plan to address the housing crisis in California. All levels of government need to face this housing crisis head-on. The current Governor's interest in having California as a whole, and local communities in particular, meet true-life housing needs for our citizens should be seen as encouraging for the City of Lompoc's future. On the other hand, restrictive zoning rules along with high building costs and anti-development sentiment have made it increasingly difficult to create new housing in California. Moreover, California needs to build 180,000 new housing units each year just to keep up with demand, but it has averaged only 80,000 a year over the last decade.

Lompoc supports the Governor when he declared *"It starts with housing, perhaps our most overwhelming challenge right now...and that is happening in large part because too many cities and counties aren't even planning for how to build."* This topic was also mentioned at the recent 2019 North Santa Barbara County Economic Summit where it stated that the Central Coast has high barriers to new housing developments and that "the State is poised to assert its authority over local land use planning, if required to ensure that housing production increases" (refer to Attachment 7). The City of Lompoc is trying to do its part to help alleviate the Housing Crisis by building additional housing units within its Urban Limit Line.

Without the incorporation of the Bailey Avenue planning area, Lompoc will continue to fall behind in the construction of new housing units and a barrier would continue to prevent Lompoc from ensuring new housing production. Lompoc would like support from the County Planning Department in this effort that clearly is of the utmost importance to the State of California at this time. In the opinion of the Lompoc staff, the housing crisis demonstrates a need for the proposed SOI amendment and Annexation.

In your memo, you mention that the City should consider rezoning lands to higher densities in order to increase its housing supply. Clearly, rezoning of land is not the answer for solving the State and Lompoc's housing crisis. Immediate resolution depends on market forces and private land owners' use considerations, which dictate where higher density may be built. The City cannot ensure more units will be built simply through rezoning. Indeed, some of the land currently identified in the City's Housing Element as zoned and available for such higher density housing is not being developed at this time, due to the property owners' individual decisions based on market forces and cost feasibility of development. On the other hand, the current application for annexation is fully supported by the subject property owners, who wish to develop housing.

It was also mentioned that California Department of Housing and Community Development RHNA progress reports show that Lompoc has permitted 48 units as of the last annual progress report in 2017. It should be noted that this figure is incorrect. For this reporting period, zero units were permitted (City of Lompoc: Annual Report on the General Plan: 2016). The City only saw a slight increase with a total of 4 units permitted in 2017 (and only 3 units in 2018). Again, that was driven by market demands and private property owners of individual in-fill lots determining it was not feasible to develop financially viable housing projects.

By far the largest and most prominent employer (2,900 + active duty) in the Lompoc Valley is the 99,578-acre site of the VAFB which is the 3rd largest Air Force Base in the United States which also creates a strong demand for housing. Out of 999 homes on the base, 952 of these units are occupied. Therefore, only 47 units are vacant and of these, only 35 units are available to rent as 12 units are currently being renovated (Emelie Lima, VAFB Housing Program Manager). When housing cannot be found, many continue to resort to commuting from other areas north or south of Lompoc which in turn increases Vehicle Miles Travelled (VMT's) and Greenhouse Gas Emissions (GHG's). In addition, all of the homes on VAFB are rented which makes home ownership for this large market area not feasible on base. Those in the military who desire home ownership must look to the private housing sector in their search for homes to buy in a market that is severely limited in the Lompoc Valley. As a result, service members look to other markets such as Santa Barbara, Santa Maria and San Luis Obispo which in turn exacerbate commuting patterns experienced in the North County

VAFB was recently selected as one of the new command's major components will be located at the base. The 14th Air Force personnel located at the base are slated to become a dual-purposed staff under the combined Force Space Component Command. In addition, VAFB is one of six locations being considered for the U.S. Space Command, which was established in December 2018 by President Donald Trump as the 11th functional Unified Combatant Command of the U.S. military.

The Bailey Avenue properties are conveniently located a short distance (less than 7 miles) from VAFB and could provide a healthy and much needed new supply of housing for purchase by active military members and an expanding military base.

For the following reasons, there is a demonstrated need for the Bailey Avenue Annexation:

- California Housing Crises (3.5 million units declared by Governor)
- Imbalance of Supply/Demand for housing
- Prevent Rising Housing Prices due to a lack of Supply vs. Demand
- Reduce False Dependence on Entitled Properties which are not being built
- Support VAFB (potential expansion of the base and lack of “for sale” units)

Orderly Growth within the City's Urban Limit Line

It is important to mention Government Code Section 56001 in the statute creating LAFCO which states clearly: “. . . it is the policy of the state to encourage orderly growth and development which are essential to the social, fiscal, and economic well-being of the state” and “. . .this policy should be effected by the logical formation and modification of the boundaries of local agencies, with a preference granted to accommodating additional growth . . . which can best accommodate and provide necessary governmental services and housing for persons and families of all incomes in the most efficient manner feasible.” The Bailey Avenue properties are located within the City of Lompoc Urban Limit Line which establishes the ultimate edge of urban development within the City. In addition, the Bailey Avenue area is also identified for potential annexation as shown in the City's Land Use Element Expansion Area (City of Lompoc 2030 General Plan Land Use Element, Policies 1.2, 1.6).

The Lompoc 2030 General Plan update went through an extensive public review process with numerous workshops, public comment and environmental review.

This process clearly delineated the City's Urban Limit Line and was subsequently approved by the Lompoc City Council. In addition, a recent growth survey taken on May 13, 2019 asked if the community desired to grow outside its current physical boundary (City Limits) and over 62% of the respondents stated “yes”. In addition, over 68% of these respondents voiced that this topic was important for the community. In short, Lompoc wants to implement the General Plan policies and goals that allows efficient and orderly growth within the adopted Urban Limit Line.

2040 Regional Transportation Plan

Sustainable Communities Plan (RTP/SCS) Conformance

The City acknowledges the goals and policies cited from the RTP/SCS and has made large efforts to protect natural resources with the update of the Lompoc 2030 General Plan with goals of having a healthy environment.

Regarding Policy 1.1 (Land Use), the City continues to attract new jobs (refer to Table 1 below) and the proposed project would be located in an area that has existing job opportunities and growth (i.e. -Vandenberg Air Force Base, Allan Hancock College, US Department of Justice, and a new medical clinic currently under construction) to help

reduce long-distance commuting (these employers are 2-7 miles from employment centers) and promote a better balance of jobs/housing. As mentioned earlier, attachment 3 outlines City General Plan policies and goals that preserve open space, agricultural land and areas of special biological value.

It is the opinion of the City that the proposed project does not conflict with Goal 1 and Policy 1.1 of the 2040 RTP/SCS because the City's General Plan was already updated to protect prime farmland west of the Urban Limit Line.

Concerning City General Plan Policy 9.1, City of Lompoc staff is committed and continues to participate in regional planning efforts and regularly attends the Technical Planning Advisory Committee (TPAC), Joint Transportation Advisory Committee (JTAC), Technical Transportation Advisory Committee (TTAC) and the newly created Regional Climate Collaboration group (through the Santa Barbara County Sustainability Division).

Environmental Review

As previously mentioned, the Housing Crisis demonstrates a significant housing need not only in the City of Lompoc but throughout California. Therefore, the proposed project should be considered even though the impacts to agricultural are significant and unavoidable; the need for housing outweighs the loss of a minor amount of agricultural land. In addition, once a Development Plan is submitted for City review, additional environmental review would be required and could provide additional measures to address the loss of farmland.

Transportation and Greenhouse Gas Emissions

Vehicle Miles Travelled (VMT)

As part of the Final EIR for the Lompoc General Plan Update, trips generated from the proposed project were analyzed (although a larger number of units) and it was determined that occupants of development in the Bailey Avenue area would travel similar distances to destinations when compared to average trips within the existing City Limits and that the rate of increase in VMTs would not exceed the rate of population growth, which was consistent with the 2007 CAP. Upon the submittal of a formal Development Plan for the proposed project, a more specific VMT analysis (for the reduced number of units and analysis of the current 2013 CAP) would be prepared in accordance with Senate Bill 743. City staff does not believe this analysis should be required at this stage but a preliminary report could be completed if needed. The City has also adopted General Plan policies as part of its Conservation and Open Space Element (Goal 8, Policies 8.1, Goal 9, Policies 9.1, 9.2 & 9.3) with the goal to minimize emissions from vehicles, reduce vehicle related air quality impacts, reduce CHG emissions, and implementing reduction measures to reduce emissions associated with vehicle trip generation. The City understands the need to implement the Sustainable Communities Strategy required by SB 375 which includes the consideration of both land use and transportation planning but that it must also address State housing goals which currently aims to build 3.5 million homes by 2025.

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

The City of Lompoc strives to decrease the use of combustion engine vehicles and the number of single passenger vehicle trips which are the largest contributor of Green House Gas (CHG) emissions in the county. The City of Lompoc has updated its General Plan policies to be consistent with the goals of the County's Energy and Climate Action Plan.

In addition, City Planning staff attend the recently created *Santa Barbara County Climate Collaborative* which is a multi-jurisdictional effort to address climate change and GHG emission reductions called for by the State. Through this collaborative effort, Lompoc will continue to participate and use practical solutions to reduce transportation emissions through a variety of strategies being drafted as a result of this effort.

More employment opportunities can help reduce CHG emissions and the City of Lompoc is doing its part to create new employment in the City. Specifically, the Lompoc City Council adopted a Cannabis Ordinance in 2017 that allows Cannabis uses (without a CAP) in most zoning districts throughout the City and is currently processing over 30 applications of which 15 have already been approved to date. Jobs in the Manufacturing, Testing and the Distribution sector will provide additional employment opportunities in Lompoc not found in Santa Maria (due to the prohibition of Cannabis uses). In addition, the City has recently attracted a large 28,000 square foot medical clinic (Community Health Centers) that is currently under construction and will open its doors to patients next year which will provide 70 jobs very close to the proposed project. Other notable projects that have aided in the jobs/housing balance is the expansion of the Lompoc Valley Medical Center (from 500 to 771 jobs), the Denmat re-location (277 jobs), Raytheon (150+ jobs), Big E Produce (197 jobs), and a Wal-Mart expansion (300+ jobs). The Hilton Garden Inn (70 employees) opened in the last two years and a variety of new restaurants (for a total of 100 jobs) and a brewery (68 jobs) in Lompoc's Old Town. Allan Hancock College (Lompoc Valley Center) continues to expand (391 Employees) as well and in past years added their Safety Training Complex. The City of Lompoc, Lompoc Unified School District, and the County of Santa Barbara (Public Social Services) contribute a combined 1,920 jobs. Refer to Attachment 8 which identifies major employers in Lompoc.

The City has also seen an increase in Industrial construction along the Commerce Court area (northwest portion of the City) and the wine industry continues to expand along the City's "wine trail". Furthermore, the approval in 2015 of the Central Coast Business Park Specific Plan (40 acres) would produce approximately 931 jobs in the Manufacturing and Industrial sectors.

As previously mentioned, VAFB was recently selected to house the 14th Air Force personnel which will be located at the base and slated to become a dual-purposed staff under the combined Force Space Component Command. In addition, VAFB is one of 6 locations being considered for the U.S. Space Command, which was established in December 2018 by President Donald Trump as the 11th functional Unified Combatant Command of the U.S. military.

The Bailey Avenue properties are conveniently located a short distance (less than 7 miles) from VAFB and could provide needed new employment opportunities to active military, civilian and independent contractors within the Lompoc Valley without the need to commute long distances, therefore reducing GHG emissions and expanding employment

opportunities in the region that has a significant impact in the City of Lompoc.

Lompoc continues to improve its jobs/housing balance and will always strive to attract and encourage employment opportunities in the City which in turn has promoted the goals of the County Energy and Climate Action Plan and Circulation Element.

Conclusion/Next Steps

The proposed project strives to meet numerous State, regional and local planning goals and policies and would include a planned, well-ordered, efficient urban development pattern (consistent with the City's planned Urban Limit Line) with appropriate consideration of preserving open space lands with those patterns in accordance with Government Code section 56300.

As requested, new information has been provided in this response such as updates to the City's 2030 General Plan, new and expanding employment in Lompoc and the need to address the current Housing Crisis that requires a multi-faceted approach from all government agencies in order to create new housing in the State of California. In short, there is a need for the proposed project to accommodate additional housing in Lompoc which can be accomplished while also reducing VMT's and GHG emissions.

City staff looks forward to meeting again with the County Planning and Development staff to further discuss the proposed project, our associated responses, and the additional information provided in this Memorandum. Staff is requesting another meeting with County Planning staff in September/October 2019 if scheduling permits.

Attachments:

1. County of Santa Barbara Planning and Development Long Range Planning Memorandum, September 28, 2018
2. Land Use Element Map and Table LU-1 (Defining the purpose and description of the Lompoc Urban Limit Line)
3. City of Lompoc 2030 General Plan Land Use Element Goals/Policies/Implementation Measures supporting the protection of agriculture and planned urbanization of the Bailey Avenue properties
4. H Street Corridor In-Fill Area
5. Map of Low-Density Infill Vacant Lots
6. Agricultural Buffer Map
7. "*The State of California Gets Serious About Housing Production*", Economic Summit: North Santa Barbara County Economic Forecast Project, May 2019
8. Major Employers in Lompoc, 2030 General Plan, Lompoc Housing Element

Cc: City of Lompoc Honorable Mayor and City Council

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Michael Luther, Public Works Director, City of Lompoc

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Santa Barbara County Agricultural Commissioner's Office



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

Date: September 28, 2018

To: Brian Halvorson, Planning Manager
City of Lompoc

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

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

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

Subject Properties

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

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

Site Description

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

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

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

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

Proposed Project

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

LAFCO Project History

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

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

Preliminary Policy Consistency

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

Agricultural Element

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

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

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

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

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

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

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

Land Use Element

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

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

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

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

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

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

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

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

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

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

Other Issues Considered

Demonstrated Housing Need

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Environmental Review

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

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

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

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

Transportation and Greenhouse Gas Emissions

SB 743 - Vehicle Miles Travelled

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

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

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

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

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

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

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

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

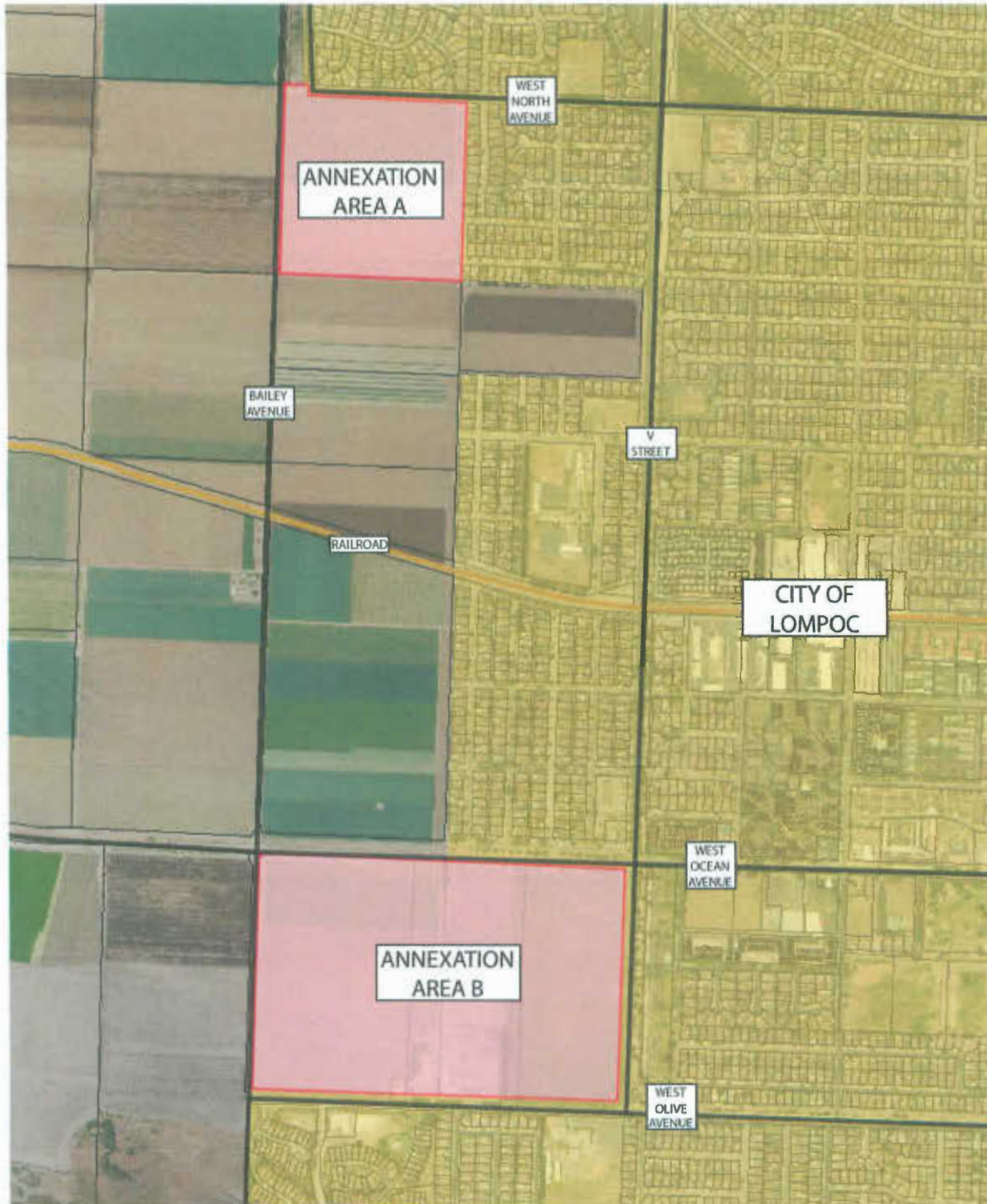
Additionally, the County is embarking upon an update to the County Comprehensive Plan Circulation Element. A major goal of the project will be to reduce VMT within the county. The proposed conversion of agricultural land to low-density residential development would increase VMT and, therefore, the proposed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

Conclusion

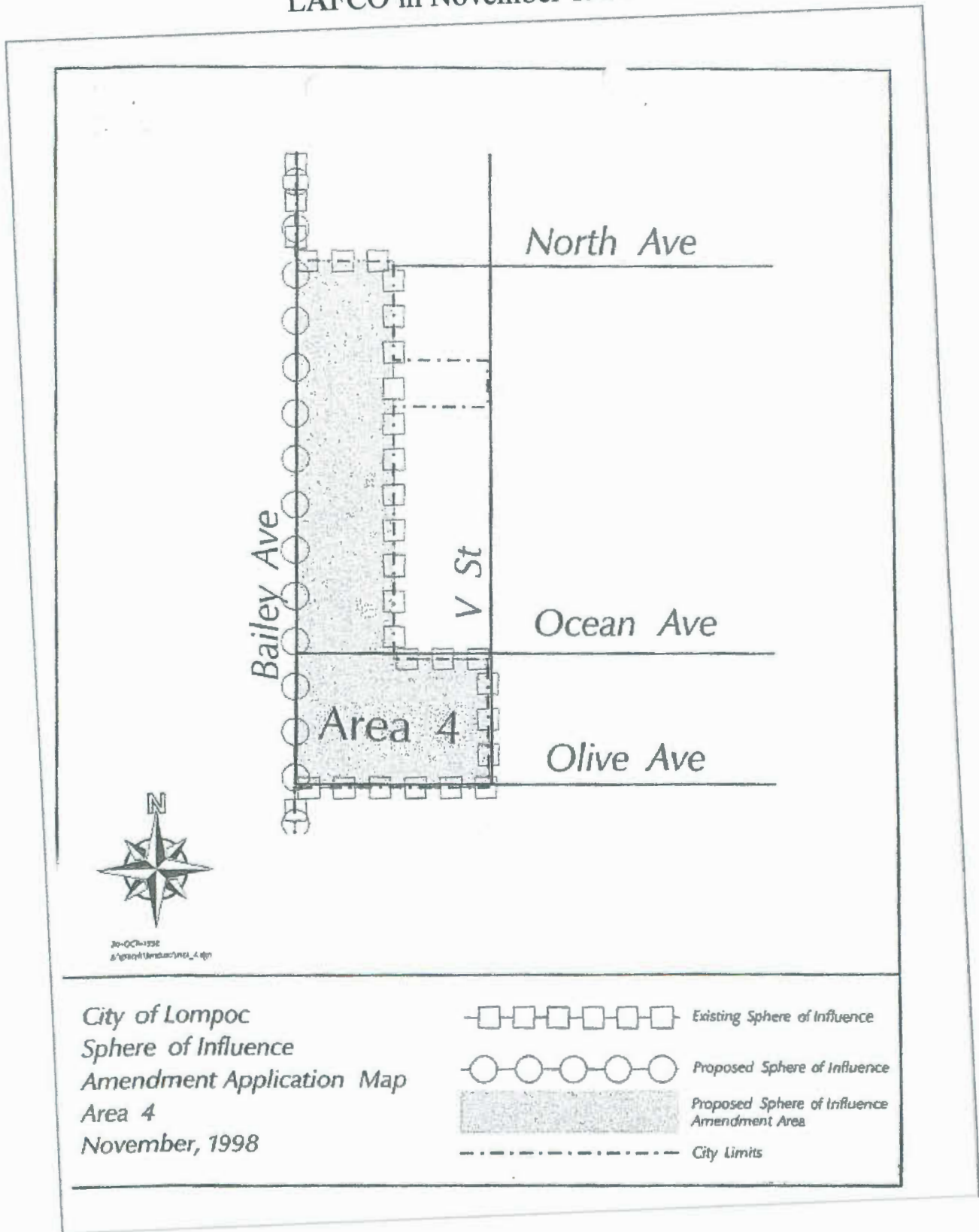
It appears that the proposed project would not comply with certain State, regional and local planning goals and policies; however, additional information might clarify the project description and demonstrate compliance with the goals and policies discussed above. More specifically, additional information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

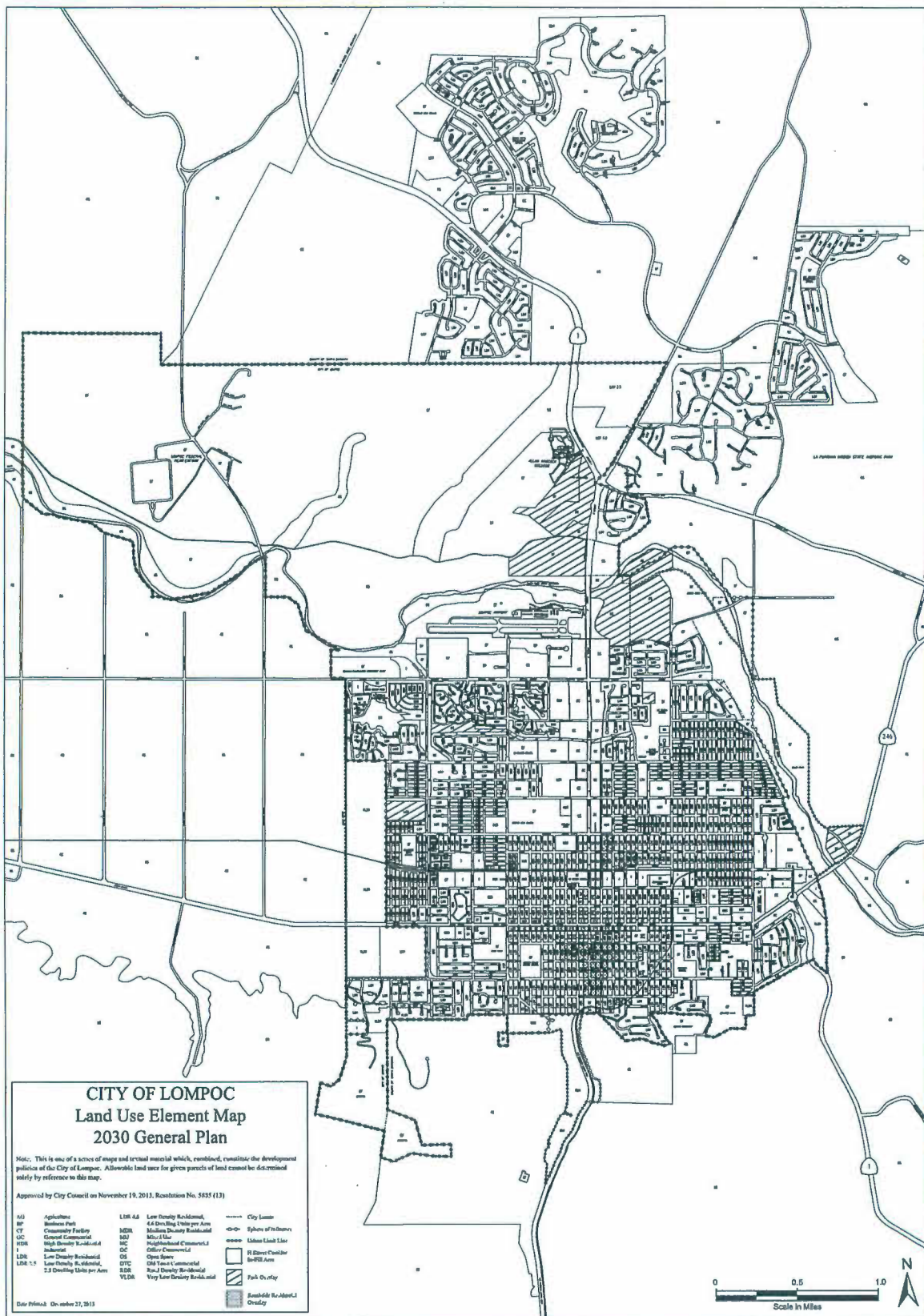
cc Jeff Frapwell, Assistant County Executive Officer, Santa Barbara County Executive Office
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Attachment A: Annexation Area Context Map



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





LAND USE ELEMENT

Table LU-1 General Plan Land Use Categories and Definitions	
Land Use Definitions	
<p>SRO Southside Residential Overlay</p>	<p>Purpose To acknowledge residential units on specific parcels in the Southside of Lompoc which have been identified by City Council, that have been legally established as legal units, regardless of underlying density requirements of the zoning district.</p>
<p>P Proposed Park</p>	<p>Purpose To identify proposed sites for the creation of public parks which address existing or anticipated community needs for active and passive recreation opportunities.</p> <p>Description Areas intended for the establishment of public park and recreational facilities to serve neighborhood, community, and regional needs of existing and future Lompoc Valley residents and visitors. Areas with this designation must have the potential to fulfill needs identified in the Parks and Recreation Element. Proposed sites are designated with dashed lines. The location of a proposed site is intended to indicate the general area where the proposed park will be located. The specific size, location, and configuration of the park site will only be finalized upon acquisition of one or more parcels.</p>
<p>S Proposed School</p>	<p>Purpose To provide proposed sites for the creation of public schools which address anticipated educational needs of the community.</p> <p>Description Areas intended for the establishment of public educational facilities to serve Lompoc Valley residents. Proposed sites are designated with dashed lines. The location of a proposed site is intended to indicate the general area where the proposed educational facility will be located. The specific size, location, and configuration of the educational facility site will only be finalized upon acquisition of one or more parcels.</p>
Boundary Lines	
<p>ULL Urban Limit Line</p>	<p>Purpose 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.</p> <p>Description 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.</p>

CITY OF LOMPOC
2030 GENERAL PLAN

LAND USE ELEMENT

GOALS AND POLICIES

Goal 1

Maintain a compact urban form and growth pattern which provides adequate space to meet housing, employment, business, public health and public service needs.

Policies

- Policy 1.1** The General Plan Land Use map in Figure LU-1 is hereby adopted. The General Plan Land Use map establishes the future distribution, extent, and geographic locations of the various land uses within the City of Lompoc. The standards applicable to each of the various use categories are set forth in Table LU-1 below.
- 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. Refer to Table LU-1 for additional information on the Urban Limit Line.
- 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.
- Policy 1.5** The City's Sphere of Influence is depicted on the Land Use Element Map. The Sphere of Influence delineates the probable ultimate physical boundaries and service area of the City. Refer to Table LU-1 for additional information on the Sphere of Influence.
- Policy 1.6** Areas identified by the City for potential annexation are depicted on Figure LU-1 as areas where the Urban Limit Line exceeds the City Limit Line. These lands include:
- Expansion Area A: the Bailey Area Specific Plan Area
 - Expansion Area B: the River Area
 - Expansion Area C: the Miguelito Canyon Area
 - Expansion Area D: the Wye Residential Area
- Policy 1.7** The City shall encourage infill development to meet City residential and commercial growth needs. The City designates the H Street Corridor Infill area as particularly suitable to infill development and shall prescribe specific design, zoning standards and architectural standards for this corridor. Additional information on the intent of the H Street Corridor Infill area is provided in Table LU-1.

- Policy 4.4 The City shall ensure that the impact of airport activities on sensitive land uses is minimized and that land uses in the vicinity of the Lompoc Airport are compatible with current and planned airport operations.
- Policy 4.5 The City shall continue to allow places of religious assembly to locate in areas where traffic, parking, and neighborhood conditions permit.
- Policy 4.6 To ensure that requested annexations do not negatively impact City fiscal health, such requests shall be accompanied by a study that analyzes the fiscal impact to the City presented by the annexation. The City shall not approve annexation requests unless it can be demonstrated: 1) that the annexation promotes orderly development commensurate with available resources; 2) that the annexation proposal would result in a positive relationship between city facility and service costs and the revenues generated subsequent to the annexation; 3) that the annexation substantially furthers the City needs for new or expanded parks, open space areas, and/or other public facilities; 4) that the annexation will positively impact public health through community design and location of resources; and 5) that an adequate revenue stream is available to provide continuing maintenance of parks, open space and other amenities provided in the annexed area.
- Policy 4.7 The City shall encourage new public facilities and commercial facilities to support walkable and/or bikeable design.

Goal 5

Protect the City's and Lompoc Valley's natural resources.

Policies

- 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.
- Policy 5.2 The City shall protect prime agricultural lands east of the City and west of the Urban Limit Line.
- 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 5.4 Development proposals in the vicinity of natural objects that have unique aesthetic significance shall not be permitted to block, alter, or degrade existing visual quality without the provision of suitable visual enhancement. This may include open space, eucalyptus groves, or vegetation that serves as a view corridor or has important visual attributes. Development proposals shall be sited to ensure that these features are retained or replaced to the extent feasible, resulting in minimal view impairment.

LAND USE ELEMENT

- Policy 5.5 Plantings that serve to screen views of residential development, or that help to maintain a natural-appearing landscape, shall be retained to the extent feasible. Such plants could be thinned selectively if thinning would improve view corridors, walkability, or protect public health, safety, and welfare. If specific trees are removed, such as eucalyptus trees, replacement trees at the appropriate density (native species when possible) shall be substituted to provide suitable screening while retaining important view corridors.
- Policy 5.6 The City shall limit development on slopes of 20% or greater by designating parcels with a substantial portion of the site containing steep slopes as Open Space, Community Facility (particularly parks), Rural Residential or Very Low Density Residential designations.
- Policy 5.7 Development on slopes exceeding 20% shall be avoided if other less steep areas are available for building sites on a given property. Any development on slopes exceeding 20% shall minimize grading and avoid interruption of ridgelines. Development on slopes exceeding 20% shall also be subject to Architectural Review by the City to minimize potential aesthetic impacts.

Goal 6

Protect the community against natural and man-made hazards.

Policies

- Policy 6.1 The City shall maintain Open Space designations for areas that require special management due to hazardous, safety, or public health considerations.
- Policy 6.2 The City shall maintain an Open Space designation for all areas in which topographic, geologic, or soil conditions indicate a significant danger to future occupants.
- Policy 6.3 The City shall require that all property owners located within an Airport Safety Area identified in the Santa Barbara County Airport Land Use Plan shall be notified, through property disclosure or other legal notice that runs with the land, that the property is within an officially designated Airport Safety Area.

Goal 7

Protect and encourage agriculture and agricultural-support businesses.

Policies

- Policy 7.1 The City shall assist agricultural-support businesses or value-added agriculture to expand and/or relocate in the Lompoc Valley.
- Policy 7.2 The City shall work with law enforcement agencies from Santa Barbara County to protect agricultural areas from theft and vandalism.
- Policy 7.3 The City shall encourage agricultural education programs conducted by local farming and community garden organizations.

- Policy 7.4** The City shall encourage the use of sustainable agricultural practices, including organic farming and viticulture.
- Policy 7.5** The City shall protect and enhance the agricultural industry, as well as community gardens and other specialty crops that are unique to the region, through careful site design, agricultural buffers, and other design features intended to protect agriculture.
- 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. (This policy also pertains to Goals #5 and #6.)
- Policy 7.7** The City shall encourage voluntary community gardens throughout the city, with the permission of the land owner, to enable residents without access to land to grow fresh, affordable food.

Goal 8

Provide for quality infill development in developed areas of the City, and encourage high-quality infill projects and redevelopment of under-utilized and blighted areas in the City.

Policies

- Policy 8.1** The City shall encourage high-quality, pedestrian and bicyclist friendly infill and redevelopment projects to revitalize the community.
- Policy 8.2** The City shall promote infill development, rehabilitation, and reuse that contributes positively to the surrounding area and assists in meeting neighborhood and other City goals.
- Policy 8.3** The City shall promote revitalization of the Old Town Specific Plan Area through attractive redevelopment of public and private facilities, whenever such projects are undertaken.
- Policy 8.4** The City shall promote revitalization of the H Street Corridor to serve community needs through attractive redevelopment of public and private properties.
- Policy 8.5** The City shall require commercial, industrial, civic, and institutional development to be designed in ways that minimize conflicts with adjacent homes and neighborhoods.
- Policy 8.6** The City shall encourage co-location of development and mixed uses within or near public transit facilities to enhance the community's image and convenience.
- Policy 8.7** The City shall require development to be pedestrian-friendly and convenient for transit.

CITY of LOMPOC

2030 General Plan

LAND USE ELEMENT

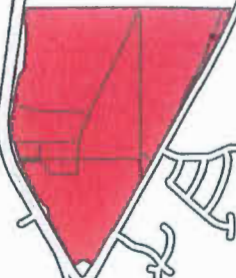
IMPLEMENTATION MEASURES

- Measure 1** The City shall amend the mixed-use development standards in the Zoning Ordinance to provide more effective incentives for mixed-use development. [Policy 3.2]
- Measure 2** The City shall amend the Zoning Ordinance to establish standards for the location of child care centers in all appropriate non-residential zones of the city. [Policies 3.1, 3.2]
- Measure 3** The City shall require future development in the Bailey Avenue Corridor (as shown on Figure LU-1) to coordinate installation of infrastructure; continuance of the existing, unbroken 200-foot buffer along the Bailey Avenue Corridor from North Avenue to Olive Avenue; and shall encourage interconnectivity, pedestrian and vehicular, between any future developments during the development review process.
- Measure 4** The City shall amend the Zoning Ordinance to allow neighborhood gardens in the Open Space Zone and in recreational areas of residential developments. [Policy 7.4, 7.7]
- Measure 5** The City shall assist the Lompoc Unified School District, Allan Hancock College, and local farming organizations acquire funding or resources for the creation of a student experimental farm. [Policies 7.3 and 7.4]
- Measure 6** The City shall contact private land trusts involved in the protection of agricultural land to pursue long-term protection of agricultural land within the Study Area. [Policies 5.4, 7.1, and 8.1]
- Measure 7** The City shall continue to support the downtown farmer's market. [Policy 7.4]
- Measure 8** The City shall amend the Zoning Code to incorporate Hillside Development Standards for development on parcels containing a substantial portion of slopes of 20% or greater. These Standards may include:
- a. Location of structures to avoid slopes of 20% or more where feasible;
 - b. Where avoidance is infeasible, conformance to the natural topography of the site;
 - c. Use of imaginative and innovative building techniques and building designs compatible with natural hillside surroundings, including the use of stepped foundations;
 - d. Grading limitations and erosion control techniques; and
 - e. Avoidance of ridgeline development and vegetative screening to reduce visibility. [Policies 5.6 and 5.7]

CITY OF LOMPOC
2030 GENERAL PLAN

LAND USE ELEMENT	
Table LU-1 General Plan Land Use Categories and Definitions	
Land Use Definitions	
<p>AG Agriculture</p>	<p>Purpose To provide areas outside the Urban Limit Line for the protection and preservation of agricultural land as well as the long term production of food, fiber, and local specialty crops.</p> <p>Description Cropland and range land which is intended to remain in agricultural use. Land in this category must total at least twenty acres in size (either individual parcels or contiguous parcels). This category includes a wide range of agricultural activities including grazing, cultivation, processing, packing, greenhouses, farm equipment storage, and incidental residential uses.</p> <p>Allowable Building Density: 1 DU/20 acres Anticipated Maximum Population Intensity: Negligible</p>
Overlay Designations	
<p>HSC H Street Corridor Infill Area</p>	<p>Purpose To encourage development of vacant or underutilized properties along the H Street Corridor to improve the aesthetics of the area and create an economically vibrant and socially inviting environment. The intent is to provide a combination of economic incentives and policy support for the revitalization of this area and for a more efficient, attractive, and pedestrian-friendly built environment. Another intent is to direct additional commercial and residential mixed uses into this corridor in keeping with economic development and urban infill goals and policies while providing enhanced opportunities for development that incorporates smart growth principals.</p> <p>A common feature in the evolution of communities of all sizes, infill refers to the incremental addition of new, renovated or adapted buildings within existing developed areas. Also older shopping centers and strip commercial areas that have failed provide an opportunity for land recycling. The benefits of infill housing include more efficient use of land, infrastructure and services; increased diversity of housing types especially smaller, more affordable units; and reduced pressure to develop previously unsettled areas that offer important ecological and/or recreational values.</p> <p>Description The H Street corridor provides the greatest opportunity for key infill projects in Lompoc. Large vacant and underutilized parcels have the potential to generate retail, office, and housing in mixed-use style developments along the corridor.</p> <p>Areas which provide a harmonious intermingling of pedestrian-oriented uses to meet the shopping, business, housing, and entertainment needs of City and regional residents with accommodations for access by automobiles, bicycles, and pedestrians alike. Vehicular parking is typically provided on-site with single-level and multi-level parking areas while still adhering to aesthetic considerations and design principles that invite pedestrians and bicyclists. Appropriate uses include retail shops; restaurants, hotels, business services; residential units; medical offices; and public and quasi-public uses of a recreational, educational, or religious type.</p>

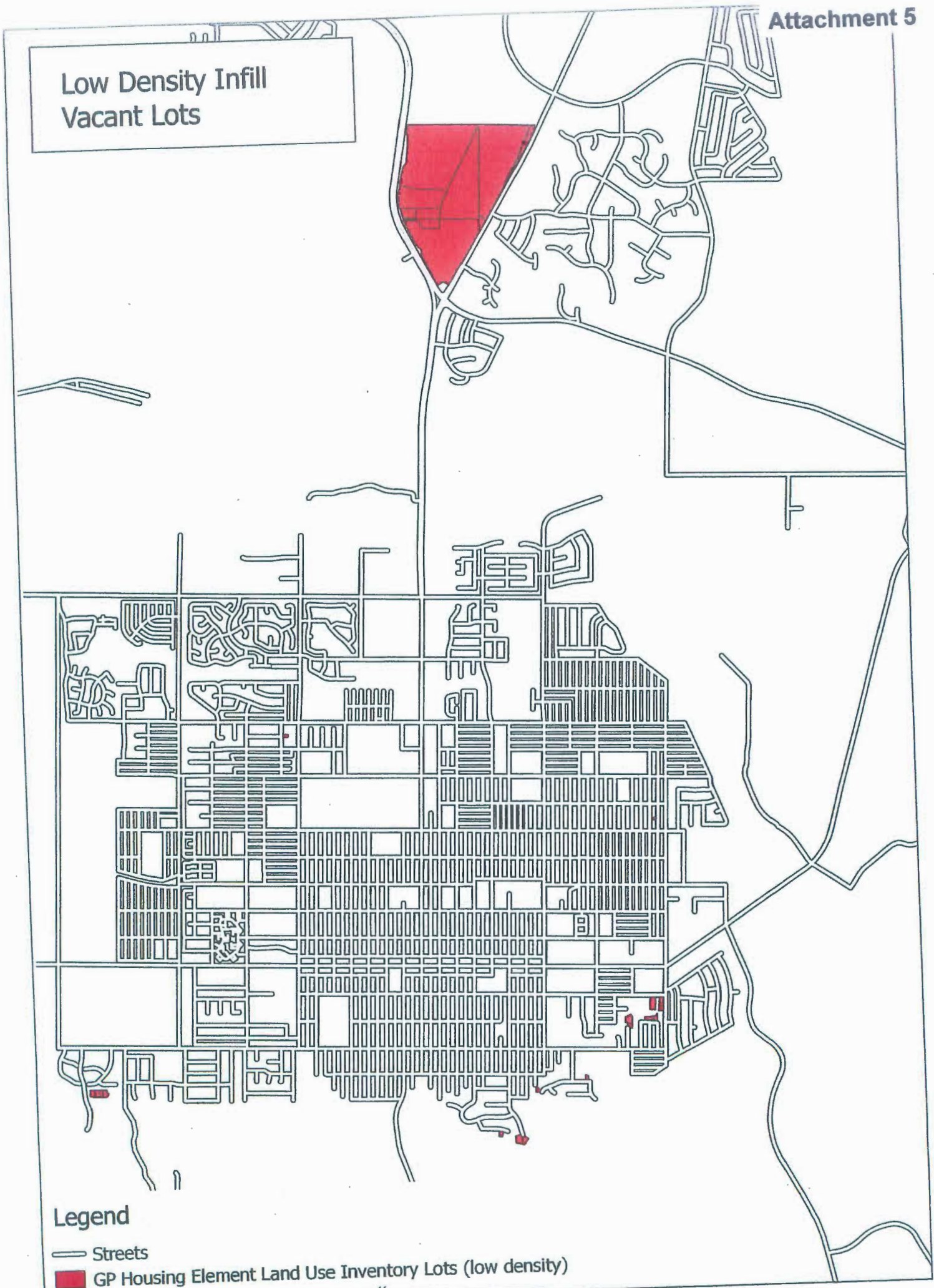
Low Density Infill
Vacant Lots



Legend

— Streets

■ GP Housing Element Land Use Inventory Lots (low density)





- Legend**
- 200 ft Ag Buffer
 - Urban Limit Line
 - Bailey Ave Parcels
 - Parcel Boundary
 - City Limit Line



released shows that new housing unit permits issued in February 2019 were down 41% from January 2019, and down 23% from the prior February. At the same time, household formation has increased due to the strong economy and near full employment. As a result of this imbalance, home prices and rents continue to rise, creating a wide range of challenges for local communities. The high cost of housing has made it more difficult for businesses to attract and retain quality talent, while remaining competitive in the global marketplace. Limited housing options are also causing young people to relocate out of the state. Since 2010, 750,000 people have left CA to move to other states. And a report by HUD in January 2017 indicates that California has the largest number of homeless persons (134,278) of any state in the nation, and also had the largest increase from 2016-2017.

The State of California Gets Serious About Housing Production

California's new Chief Executive, Governor, Gavin Newsom, has made it clear that housing will be a top priority for his administration. His actions since taking office indicate he is serious about addressing the large and growing shortfall of homes in California. In January, the Governor proposed a budget that included an unprecedented \$1.75 billion to promote housing production, including \$750 million to support local planning efforts and incentivize housing production, as well as \$1 billion for tax credits and home construction. He also signed an executive order to build affordable housing on excess state lands. Governor Newsom has sent a strong message to local governments that he expects them to be part of the solution. In his 2019 State of The State address, Governor Newsom declared: "It starts with housing, perhaps our most overwhelming challenge right now ... and that is happening in large part because too many cities and counties aren't even planning for how to build." To support local governments to "do what's right", he added, "...there must be accountability for those who don't." In January, the state took legal action, for the first time, against a city for blocking housing production and violating state housing law. In February, the Governor met with city and county officials from jurisdictions that are out of compliance with state-required local housing elements for what he called "a candid conversation" about the state's housing crisis. Newsom said, "These cities need to summon the political courage to build their fair share of housing." The Governor's plan includes support for local jurisdictions in meeting higher short-term housing production goals, and revisions to the process by which those goals are set (known as RHNA). The California Legislature has also been busy again this term, proposing a number of housing related bills. The most controversial proposed law is SB 50, which would compel cities to allow development of higher density multi-family structures, with reduced parking requirements, near transit and jobs. All of this confirms that in areas like coastal California, where barriers to new housing development have typically been quite high, the state is poised to assert its authority over local land use planning, if required to ensure that housing production increases.

Santa Barbara County - South Coast Apartment Market Survey Results

Sustained job growth in the South Coast region has created steep competition for available apartments, and has contributed to rapid rent appreciation. Despite increased housing production in Santa Barbara South Coast market area, including numerous individual accessory dwelling units, and scattered small to mid-sized apartment projects, the apartment vacancy rate remains exceptionally low at 1.85% in March 2019, and has remained below 2% since 2011! Dyer Sheehan Group's March 2019 survey of the local apartment market further indicates that the Overall Average Rent in the South Coast Market Area shot up 5.6%,

HOUSING ELEMENT

Table H-7a Major Employers	2003	2007
Vandenberg	7,509	4,374
Lompoc Unified School District	1,745	1,452
Federal Correction Institution	739	530
City of Lompoc	549	507
Lompoc Hospital	500	500
United Launch Alliance	n.a.	414
Home Depot	n.a.	287

Source: North Santa Barbara County Economic Outlook, UCSB Economic Forecast Project, 2002 and 2008

Table H-7b Major Employers	2013
Vandenberg	6,996
Lompoc Unified School District	1,528
Lockheed Martin	1,098
U.S. Dept. of Justice (Prison & Institute)	743
Lompoc Healthcare District	625
City of Lompoc	443
World Minerals	300
Wal-Mart	297
Allan Hancock College	228
Vons	139
LOVARC	125
Albertsons	100
Coast Hills Federal Credit Union	99

Source: Community and Economic Profile 2013, Lompoc Valley Chamber of Commerce & Visitors Bureau