



January 31, 2023

Mr. Mike Prater
Executive Officer
Santa Barbara Local Agency Formation Commission
Submitted via email to lafco@sblafco.org

Re: City of Lompoc SOI Amendment Proposal – Failure to Preserve Community Identity and Agricultural Viability

Dear Mr. Prater and Members of the Commission:

This comment is submitted by the Environmental Defense Center (“EDC”) on behalf of Santa Barbara County Action Network (“SBCAN”) to provide additional information to the Commission regarding the detrimental impact the City of Lompoc’s (the “City”) Sphere of Influence (“SOI”) Amendment proposal, Local Agency Formation Commission (“LAFCO”) File No. 22-07 (the “Proposal”), would have on the area’s unique community identity and agricultural viability.

I. LAFCO Policy and the Santa Barbara County Comprehensive Plan Require Preservation of Community Identity and Disfavor SOIs That “Cross-cut” Communities.

In addition to those policy inconsistencies described in EDC’s previous letters,¹ the City’s Proposal would violate LAFCO policy that states: “[s]phere of influence lines *shall* seek to preserve community identity and boundaries” with respect to proposals that “cross-cut . . . affected communities.”² The use of “shall” creates a mandatory duty. Moreover, Section V of the Santa Barbara County Comprehensive Plan Lompoc/Community Goals requires that “[t]he unique character of the area should be protected and enhanced with particular emphasis on protection of agricultural lands.”³ Although the County’s Comprehensive Plan is not directly

¹ See, EDC, *City of Lompoc – Proposal to Expand the Sphere of Influence for the Bailey Avenue Properties* (December 7, 2022).

² (emphasis added). See, Santa Barbara LAFCO, *Sphere of Influence Policies* at <https://www.sblafco.org/files/4a70e3d58/SPHERE+OF+INFLUENCE+POLICIES.pdf>

³ See, Santa Barbara County, Planning and Development, *LAFCO Request for Reportback - File No. 22-07 for the Bailey the Avenue Sphere of Influence (SOI) Amendment – City of Lompoc* at 1 (October 2022).

applicable to SOI amendments, LAFCO policy encourages consistency with County and City local plans and requires the Commission make specific findings when approving inconsistent actions.⁴

The configuration of the current SOI Proposal creates two jutting residential enclaves, surrounded on three sides by agricultural land, that cross-cut a traditionally rural community boundary—thereby threatening the areas unique local character and identity.⁵

II. The City’s Proposal Would Undermine Agricultural Viability of Nearby Properties and Create Conflicts Between Residential Activities and Agricultural Operations.

The City’s proposal would result in existing agricultural lands being sandwiched by development. This would give rise to conflicts between agricultural and non-agricultural uses, and pave the way for additional conversion of important farmlands, thereby undermining the greater agricultural viability of the region.

Ms. Wineman’s properties—totaling 177 acres of actively cultivated Prime farmland along Bailey Avenue—would be particularly impacted by the Proposal.⁶ Her properties share a direct border with the proposed Bailey property (previously Annexation Area A) and diagonally abut the proposed Bodger property (previously Annexation Area B).⁷ The Wineman properties have been used for active agriculture since the 1950’s and consistently produce high yields of broccoli, cauliflower, lettuce, and blackberries. Michele, an experienced agriculturist, described her properties as “among the best and most fertile farm ground not only in the Lompoc Valley but also in the State of California.”⁸

Ms. Wineman manages a network of farmers and lessees, who, with their employees, equipment specialists and auxiliary partners, cultivate and distribute crops from the Wineman properties. Michele stated in her comment letter submitted to LAFCO that “[t]he 70+ years my family has owned and farmed land along Bailey Avenue, in conjunction with other long-farmed properties in the area, has fostered a distinct rural and agricultural identity.”⁹ Ms. Wineman believes that approval of the City’s Proposal would destroy the area’s rural character by creating conflicts between residential activities and existing operations.

For example, Ms. Wineman notes that “City residents do not distinguish between private open space (i.e., farm fields) and public open space (i.e., parks & other recreation areas).”¹⁰ This leads to trash, dog droppings, and damage to expensive farm equipment.¹¹ Vandalism and theft

⁴ *Id.*

⁵ *See*, Appendix A (showing the layout of land included in the current SOI amendment proposal).

⁶ *See*, Appendix B (showing layout of Michele Winemans properties).

⁷ *Id.*

⁸ *See, Michele Wineman’s Personal Statement – Impact of Lompoc’s Proposed SOI Amendment on Bailey Avenue’s Rural Identity and Use Conflicts* (January 30, 2023).

⁹ *Id.*

¹⁰ *Id.*

¹¹ *Id.*

are big concerns. Increased traffic makes it dangerous to move slow farm equipment like tractors and expanded roads cuts into farmable acres.¹² Unmaintained nonfarm properties are breeding grounds for noxious weeds and rodents, which damage and contaminate crops.¹³ City residents often complain about noise, dust, and odors – all necessary components of farming.¹⁴

In order to minimize potential conflicts, Ms. Wineman and other similarly situated property owners will have to implement modifications to existing operations. For instance, Ms. Wineman is forced to “reduce our farmable acres” by leaving space in the form of buffer zones to neighboring residential uses.¹⁵ Other potential modifications include fences, security cameras, artificial barriers, and more. Ms. Wineman’s personal experience is highly demonstrative of the adverse effects residential development can have on agricultural production and community identity.¹⁶

SBCAN agrees that approval of the City’s Proposal would undermine Bailey Avenue’s unique rural and agricultural character, thereby threatening to undermine agricultural viability well beyond the Proposed SOI itself. This is directly inconsistent with LAFCO’s policies requiring the preservation of prime agricultural lands and community identity and Section V of Santa Barbara County’s Comprehensive Plan Lompoc/Community Goals.

Conclusion

We ask the Commission to deny the City’s Proposal in accordance with LAFCO policy and applicable County Goals to preserve Bailey Avenue’s unique community identity and agricultural viability.

Sincerely,

Maggie Hall
Senior Attorney

¹² *Id.*

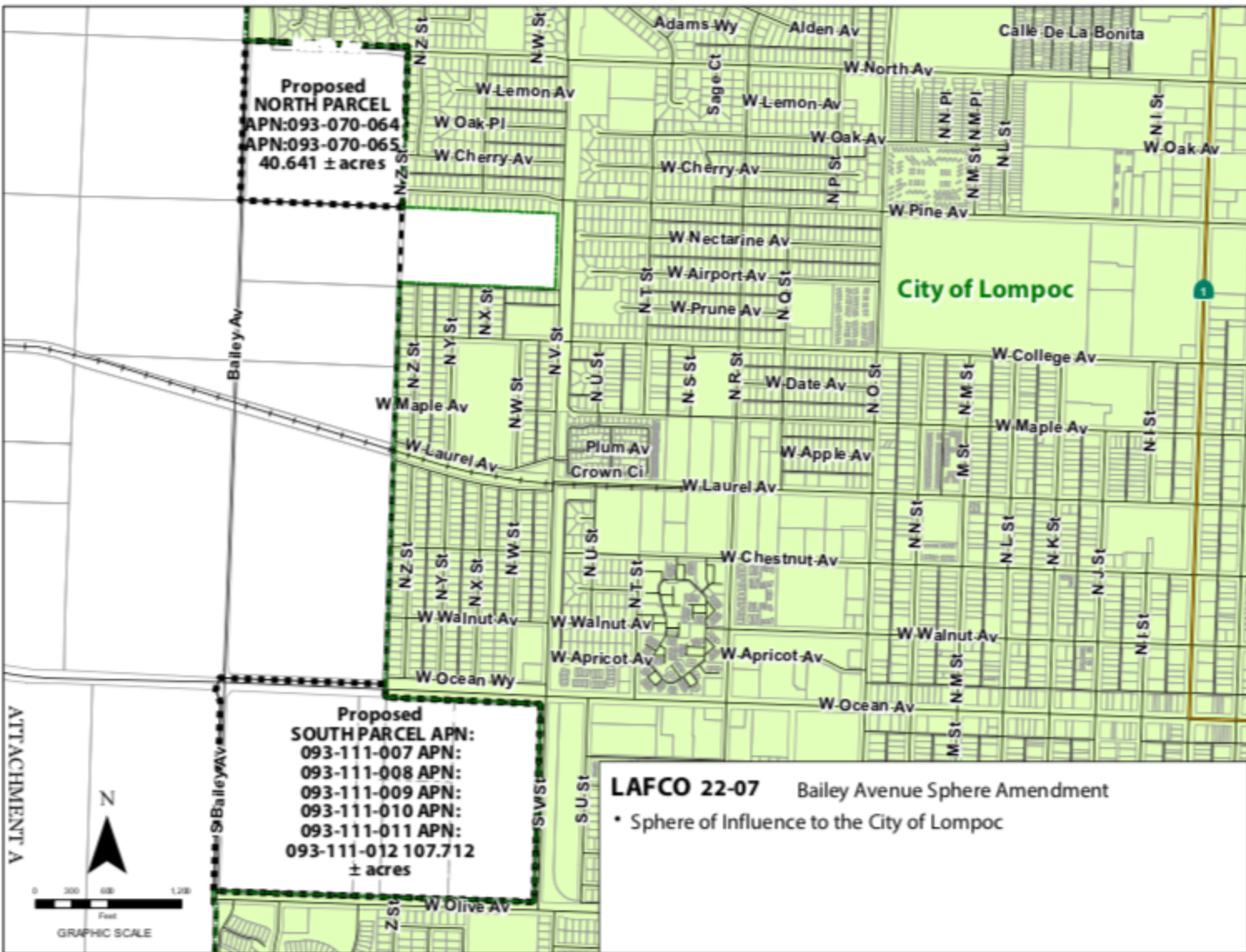
¹³ *Id.*

¹⁴ *Id.*

¹⁵ *Id.*

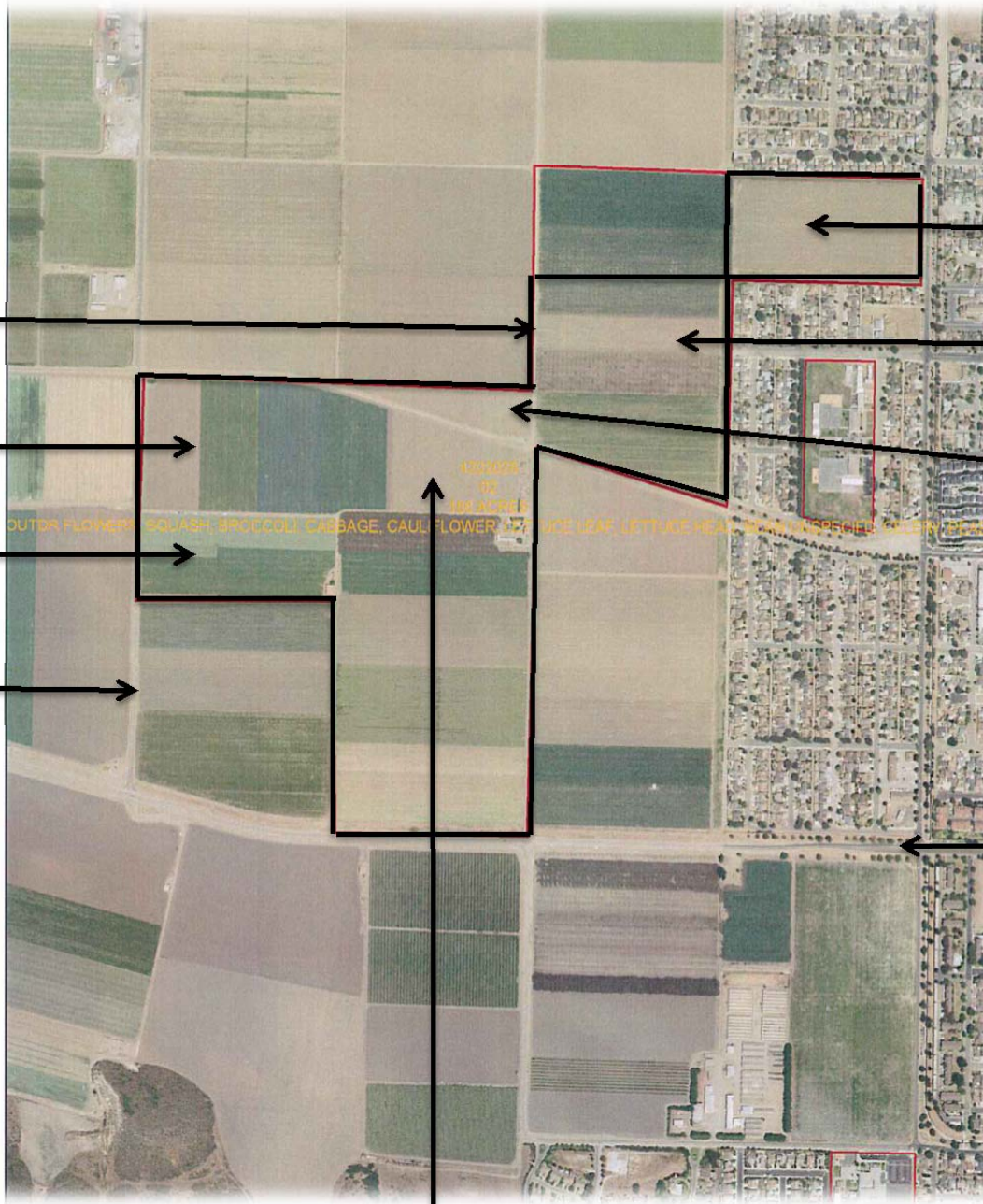
¹⁶ *Id.*

Attachment A



Attachment B

Exhibit A



Bailey Avenue

Huyck Parcel
APN 093-090-008

Zvolanek Parcel
APN 093-090-007

Floradale Avenue

13th Street Parcel
APN 093-070-039

McCarrier Parcel
APN 093-070-031

3 Acre Parcel
APN 093-070-029

Ocean Avenue

Main Parcel
APN 093-090-033

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