



LAFCO - San Luis Obispo - Local Agency Formation Commission
SLO LAFCO - Serving the Area of San Luis Obispo County

December 16, 2019

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Ms. Shawna Scott, Senior Planner
Community Development Department
City of San Luis Obispo
919 Palm Street
San Luis Obispo, CA 93401

**Subject: Comments Draft Environmental Impact Report (EIR) –
Froom Ranch Specific Plan**

Dear Ms. Scott:

Thank you for the opportunity to comment on the draft Environmental Impact Report for the Froom Ranch and Villaggio Life Plan Community project. The Local Agency Formation Commission (LAFCO) is a Responsible Agency that may use this document for consideration of a future annexation to the City. Thank you for taking the time to discuss the project with us on December 9, 2019. The meeting covered how the City intends to address protection of important agricultural and open space lands as the project proceeds. Please consider the following comments:

1. **General Comment.** The use of the Land Evaluation Site Assessment Model for the definition of prime agricultural land may not align with the Cortese-Knox-Hertzberg Act (CKH Act) definition of prime agricultural land. It appears that when the CKH definition of prime agricultural land is used, more prime land would be converted under the current project plan. This could represent a gap in the CEQA record and should be addressed in the Response to Comments, Final EIR and the Cities conditioning authority.
2. **LAFCO's comments** were submitted as part of the Notice of Preparation process and were focused on the protection of such lands. It is important to address this issue through either mitigation measures or the City's conditioning authority. We appreciate that the City will make an effort to meet the intent of LAFCO's prime agricultural policies through the adopted conditions of approval placed on the project.

3. **Upper Terrace.** The alternative project being considered would no longer develop the upper terrace area as originally proposed. In fact, this area would be placed in a protective easement because of the important natural resources and wildlife corridor habitat. This change would be consistent with LAFCO's policies that call for this type of protection.
4. **Reconfigured Agricultural Easement.** The proposed reconfiguration of the 7.1 acres that are already under a conservation easement from the Gap annexation appears to be consistent with the original condition.
5. **Off-Site Protection Opportunities.** LAFCO encourages the City and applicant to look for an off-site opportunity to preserve prime agricultural land that meets LAFCO's 1:1 preservation requirements. This was accomplished when San Luis Ranch and Gap annexations were approved.
6. **Open Space Easements.** It is our understanding the Froom Ranch Specific Plan will include all open space and protection areas within easements with approximately 63% (74ac) of the site being preserved in conservation/open space. This type of conservation effort is consistent with LAFCO's goals and policies. As with prior annexations, the timing of the easements will be required to be in place prior to LAFCO filing the final annexation (if approved) with the state Board of Equalization.

We appreciate being contacted with regard to this project. If you have any questions regarding these comments please contact Mike Prater or me at 805-781-5795.

Sincerely,



David Church
LAFCO Executive Officer

cc. Brian Pierik, LAFCO Counsel
Lynda Auchinachie, Agricultural Commissioner's Office