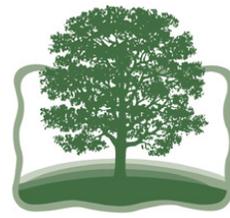




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CHAPTER



North County Watch

Looking Out Today For Tomorrow

August 27, 2012

Planning Commission
County of San Luis Obispo
San Luis Obispo, CA 93406
Via Email "Ramona Hedges" <rhedges@co.slo.ca.us>

RE: Item 2 Amendments to the Ag Cluster Subdivision Ordinance

Dear Chair O'Grady and Commissioners,

North County Watch is a 501 3c non-profit Public Benefit corporation. We are an all-volunteer organization committed to sustainable development in and around north San Luis Obispo County.

The Santa Lucia Chapter of the Sierra Club represents San Luis Obispo County members of the Sierra Club, the nation's oldest and largest grassroots environmental organization.

As a result of some very controversial Ag Cluster projects, the Board of Supervisors in 2009 directed staff to amend the Ag Cluster Ordinance. Ag cluster subdivisions can aide in preserving agricultural land for agriculture but projects such as the Santa Margarita Ag Cluster subdivision and the current Laetitia project have exposed some serious flaws in the current ordinance. We thank staff for bringing forward these carefully crafted amendments that will serve the goal of preserving ag lands while preventing abuse of the program.

If you are not familiar with the Santa Margarita project, staff recommended denial of the project as proposed and offered an alternative that was more in keeping with the intent of the ordinance. Elements particularly troublesome with the Santa Margarita project were the density bonus, water availability (Water was a Class I impact), the non-contiguous nature of the subdivision, the method of calculation of the 5% project site in that the 5% did not include subdivision infrastructure and roads or the required ag buffers and the project did not avoid prime soils, for example.

The Laetitia project, initiated under the current ordinance, has particularly troubling water issues among others. The project has gone through one re-circulation of the DEIR and seems headed for a second re-circulation. We believe the current amendments would clarify a number of controversial issues. Applicants and the public will benefit from these amendments.

We believe the Ag Cluster Ordinance was originally adopted with a Mitigated Negative Declaration. We commend staff on the analysis in the current EIR.

We support staff recommendation to impose a "two road mile from the URL" qualifying limit on eligibility for an ag cluster. In addition, we suggest that all subdivision of ag land within this 2 mile limit should be required to be an ag cluster. If you were to consider expanding eligibility to a 5-mile limit, a requirement that all subdivision of ag land be a cluster would maximize protection of ag land.

We note that the current ag cluster ordinance applies only to Inland areas (Title 22). You have before you amendments to the current Title 22 ordinance, and amendments to Title 23 which applies to coastal areas and which would extend a form of ag cluster to coastal areas. The ag cluster program for the Inland Area (Title 22) and the proposed cluster ordinance for the Coastal Area (Title 23) are significantly different. In the interest of clarity for the public and efficiency, we request that you hear and approve on separate motions the adoption of Title 22 amendments and Title 23 amendments.

Please support all of these amendments. They are important improvements to the Ag Cluster Ordinance.

Thank you for your consideration of our comments.



Susan Harvey
President, North County Watch



Andrew Christie
Director, Santa Lucia Chapter