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March 3, 2014

To: San Luis Obispo City Council  
Re: 3/4/14 meeting, Item PH3: **Request to Initiate Amendments to the Orcutt Area Specific Plan**

Dear Councilmembers,

At your March 2, 2010, meeting, when your Council was reviewing the Environmental Impact Report for the Orcutt Area Specific Plan, the Sierra Club pointed out the problematic claim in the EIR that the Class I cumulative impact represented by the conversion of 7.4 acres of ag land outside the Urban Reserve Line would be reduced to a less than significant level by the inclusion of open space within the URL near Righetti Hill (FEIR 10-90). We noted that designating the protection of open space land as mitigation for the loss of prime ag soils did not conform with the provisions of the California Environmental Quality Act as it would do nothing to mitigate the loss of prime farmland.

We agreed with the County Department of Agriculture's assessment of cumulative impacts, in that even if the City were to protect "equivalent or better farmland" outside the URL, "such mitigation is only partial and the significant cumulative impact remains significant and unavoidable."

The City dismissed these objections and approved the proposed conversion of 7.4 acres of prime farmland outside the URL in exchange for the addition of open space land at Righetti Hill.

The current proposal to develop the open space on Righetti Hill now adds insult to injury. In 2010, the City risked the eventual loss of all its prime ag soils when it set the precedent of inappropriate mitigation. The City is now being asked to set the precedent of an infinitely flexible URL, with attendant impacts on the viewshed and greenbelt, whenever a developer wants more room to develop.

We urge you not to add the erosion of the city's open space to the loss of prime farmland, and act instead to ensure that the URL continues to fulfill its function in the manner intended.

Thank you for this opportunity to comment,

Andrew Christie  
Chapter Director