



San Diego County
Local Agency Formation Commission
 Regional Service Planning | Subdivision of the State of California

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AGENDA REPORT
 Public Hearing

October 5, 2020

TO: Commissioners

FROM: Keene Simonds, Executive Officer
 Robert Barry, Chief Policy Analyst

SUBJECT: Proposed Update to Agricultural and Open Space Lands Policy

SUMMARY

The San Diego County Local Agency Formation Commission (LAFCO) will consider approving a proposed update to the “Preservation of Open-Space and Agricultural Lands Policy.” The proposed update returns intact from the draft presented in August and subsequent public review and comment period. The proposed update includes several substantive revisions that collectively aim to better balance the Commission’s statutory direction to preserve agricultural and open space resources while reflecting local conditions and objectives. This includes – notably – policy provisions to encourage new agricultural uses without impacting otherwise available development options. Staff recommends approval.

BACKGROUND

Agricultural and Open Space Lands Policy

San Diego LAFCO’s Preservation of Open-Space and Agricultural Lands Policy was adopted in November 1978 and last amended by the Commission in May 1998. The policy restates germane provisions of statute with respect to tasking the Commission to preserve open-space and agricultural lands and associated procedures. This includes a premising statement to discourage proposals that would convert prime agricultural or open-space lands to other uses the actions would promote the planned orderly and efficient development of an area.

<p>Administration Keene Simonds, Executive Officer County Operations Center 9335 Hazard Way, Suite 200 San Diego, California 92123 T 858.614.7755 F 858.614.7766 www.sdlafco.org</p>	<p>Jim Desmond County of San Diego</p> <p>Chair Dianne Jacob County of San Diego</p> <p>Greg Cox, Alternate County of San Diego</p>	<p>Mary Casillas Salas City of Chula Vista</p> <p>Bill Wells City of El Cajon</p> <p>Paul McNamara, Alternate City of Escondido</p>	<p>Mark Kersey City of San Diego</p> <p>Chris Cate, Alternate City of San Diego</p>	<p>Jo MacKenzie Vista Irrigation</p> <p>Barry Willis Alpine Fire Protection</p> <p>Erin Lump, Alternate Rincon del Diablo MWD</p>	<p>Vice Chair Andy Vanderlaan General Public</p> <p>Harry Mathis, Alternate General Public</p>
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Scheduled Update to the Preservation of Agricultural and Open Space Lands Policy | Presentation and Feedback on Draft Updates in February 2019 and August 2020

The Commission's current 2020-2021 workplan was adopted at a noticed hearing in May 2020 and outlines over two-dozen project goals for the fiscal year. The workplan is organized to categorize projects into one of three priority levels: high; moderate; and low. The workplan includes continuation of an earlier scheduled update to the Commission's Preservation of Open-Space and Agricultural Lands Policy as a high priority and – among other items – timed in response to the issuance of a topical CALAFCO white paper exploring best practices.¹ The project was originally scheduled as part of the 2018-2019 workplan with an initial draft update presented to the Commission in March 2019 with subsequent direction to staff to revisit and perform local stakeholder outreach. The Executive Officer subsequently requested and received approval to continue the project into 2020-2021.

A second draft update to the Preservation of Open-Space and Agricultural Lands Policy was presented to the Commission at its August 2020 meeting. This second draft was substantively reworked to incorporate earlier Commission feedback as well as input solicited from key stakeholders – including the San Diego County Farm Bureau and Wildlife Habitat Conservation Coalition. The Commission proceeded to direct staff to initiate a formal public review and return with a proposed update for future consideration. Staff was also directed to confer with the County of San Diego to assess compatibility with its Agricultural Promotion Program.

DISCUSSION

This item is for San Diego LAFCO to consider approving a proposed update to the Preservation of Open-Space and Agricultural Lands Policy. The proposed update returns entirely intact from the second draft version presented at the August 2020 meeting and in doing so continues to be headlined by seven substantive revisions as summarized below.

- Distinguish Between Agricultural and Open Space Lands
Bifurcate the policy to explicitly distinguish between agricultural and open space lands and their distinct societal functions relative to Commission's duties.
- Address Wildlife and Local Habitat Planning in Open Space Considerations
Expand the policy to distinguish differences in open space types and prioritize the protection of natural (unbuilt) open space lands supporting wildlife.
- Use of Open Space as Municipal Greenbelts
Encourage the County of San Diego and cities to strategically coordinate and maintain open space lands as municipal greenbelts and create community separators. This addition – pertinently – recognizes open space as a municipal service.

¹ The CALAFCO white paper was prepared in partnership with the American Farmland Trust in February 2018 and explores statewide trends involving the conversion of "important farmland" along with reviewing the policies of several LAFCOs in ag-concentrated counties in devising a series of best practices divided between three distinct phases: (a) avoidance; (b) minimization; and (c) mitigation.

- Expand Focus to Address All Agricultural
Expand the policy provisions from its existing focus on prime agriculture to address all agriculture (i.e. unique farmland, farmland of statewide or local importance, etc.).
- Distinguish Between In-Ground and Above-Ground Agriculture
Revise the policy to make distinctions between above-ground agriculture activities (e.g. floral nurseries) and in-ground activities (e.g. row crops) and provide the Commission additional latitude in considering proposals involving the former category.
- No Harm Provision: Lands No Longer Viable for Agricultural Use
Add a policy exception for lands that otherwise qualify as agriculture or prime agriculture under statute (i.e. potential to generate a commodity value of at least \$400 an acre) if disused for agricultural purposes over the preceding 60-month period. This provision helps to locally quantify the economic viability of agricultural uses for lands subject to Commission proceedings and intended to also encourage (or not discourage) new agricultural ventures without triggering future LAFCO restrictions.
- Extending Municipal Services to Support Agricultural Uses
Broaden the policy to contemplate circumstances when the extension of municipal services to agricultural lands through jurisdictional changes and/or out-of-agency contracts may be appropriate in maintaining economic vitality.

A complete track-change version of the proposed update is provided as Attachment One.

ANALYSIS

San Diego LAFCO's Preservation of Open-Space and Agricultural Lands Policy directly addresses the Commission's central and sometimes competing interests in statute to protect agricultural and open space while accommodating new growth and development. The proposed update incorporates earlier Commission feedback and this includes vetting the document with the San Diego County Farm Bureau, Wildlife Habitat Conservation Coalition, Cities Advisory Committee, and Special Districts Advisory Committee to help capture local conditions. Additionally, the County of San Diego also reviewed the proposed update and finds it consistent with the General Plan. The summation of these efforts produces a modern document to communicate the Commission's broader orientation towards agriculture and open space and highlighted by the seven revisions detailed in the preceding section.

RECOMMENDATION

It is recommended San Diego LAFCO approve the proposed update to the Preservation of Open-Space Agricultural Lands Policy as presented with any desired changes. This recommendation is consistent with Alternative Action One in the proceedings section.

ALTERNATIVES FOR ACTION

The following alternatives are available to San Diego LAFCO through a single motion:

Alternative One (recommended):

- (a) Approve the proposed update to the Preservation of Open-Space and Agricultural Lands Policy as provided as Attachment One with any desired changes.
- (b) Authorize the effective date of the proposed update as October 5, 2020.

Alternative Two:

Continue consideration to a future meeting and provide direction as needed.

Alternative Three:

Take no action.

PROCEDURES

This item has been placed on San Diego LAFCO's agenda for action as part of a noticed public hearing. The following procedures, accordingly, apply:

- 1) Receive verbal presentation from staff unless waived.
- 2) Initial questions or clarifications from the Commission.
- 3) Open hearing and receive any public testimony.
- 4) Close the hearing and consider the staff recommendation or alternatives.

Respectfully,



Keene Simonds
Executive Officer

Attachments:

- 1) Draft Update to Agricultural and Open Space Lands Policy (track-changes)
- 2) Comment from Director Hannah Gbeh with San Diego County Farm Bureau
- 3) Comment from Director Dan Silver with Endangered Habitats League
- 4) Comment from Advance Planning Chief Eric Lardy with the County of San Diego (Finding of General Plan Consistency)
- 5) Comment from Chair James Peugh with San Diego Audubon Society
- 6) Comment from Bill Tippets

LEGISLATIVE POLICY L-101

Subject

PRESERVATION OF OPEN SPACE AND AGRICULTURAL LANDS

Purpose

To further the policies and priorities of the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 regarding the preservation and enhancement of natural open space and prime agricultural lands and provide guidance therein to applicants and other interested parties.

Background

The State Legislature has instructed Local Agency Formation Commissions to establish policies that address the preservation of open space and agriculture (Govt. Codes § 56300 and 56377). This includes considering the effects of all spheres of influence and jurisdictional changes on open space and agricultural lands (Govt. Codes § 56425 and 56668). Additional instruction involves prime agricultural lands and open space supporting wildlife as defined under Fish and Game Code 89.5. LAFCOs are required to consider how spheres of influence or changes of local governmental organization could affect open space and prime agricultural lands. Specifically, Commissions are directed to guide development away from prime agricultural lands and open space supporting wildlife – unless that action would not promote the planned, orderly and efficient development of an area – and to encourage development of existing vacant lands within an agencies' boundaries or non-prime agricultural lands within a jurisdiction before approving any proposal that would allow development of open space lands outside of an agency's boundary (Govt. Code § 56377). Proposals must be further reviewed for their effect on maintaining the physical and economic integrity of agricultural lands (Govt. Code § 56668).

Gov. Code § 56064 contains a definition of "Prime Agricultural Land." "Prime agricultural land" means an area of land, whether a single parcel or contiguous parcels, that has not been developed for a use other than an agricultural use and that meets any of the following qualifications:

- (a) Land that qualifies, if irrigated, for rating as class I or class II in the USDA Natural Resources Conservation Service land use capability classification, whether or not land is actually irrigated, provided that irrigation is feasible.

Commented [S1]: "enhancement" reflects SD LAFCO discretion to proactively aid existing and new ag and open space uses

Commented [S2]: Unbuilt open space; excludes golf courses, parks, and other improvements, park spaces

Commented [S3]: striking of "prime" broadens policy coverage consistent with legislative direction to LAFCOs in 56300 to "establish written policies and procedures and exercise its powers pursuant to this part and in a manner consistent with those policies and procedures and that encourages and provides planned, well-ordered, efficient urban development patterns with appropriate consideration of preserving open space and agricultural lands with those patterns"

Commented [S4]: "guidance" added to reflect the disclosure aspect/role of the policy

Commented [S5]: 56300 references "agricultural lands" and 56377 references "prime agricultural lands"

Commented [S6]: attempt to highlight order of significance to LAFCOs with respect to ag lands (important) and prime ag lands (most important)

Commented [S7]: "supporting wildlife" serves to distinguish between natural open space v. vacant land...

- (b) Land that qualifies for rating 80 through 100 Storie Index Rating.
- (c) Land that supports livestock used for the production of food and fiber and that has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the United States Department of Agriculture in the National Range and Pasture Handbook, Revision 1, December 2003.
- (d) Land planted with fruit or nut-bearing trees, vines, bushes, or crops that have a nonbearing period of less than five years and that will return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than four hundred dollars (\$400) per acre.
- (e) Land that has returned from the production of unprocessed agricultural plan products an annual gross value of not less than four hundred dollars (\$400) per acre for three of the previous five calendar years.

Policy

It is the policy of the San Diego Local Agency Formation Commission to:

- 1. Make appropriate distinctions between open space and agriculture and their separate functions and benefits.
- 2. Protect and preserve open space lands – and of most importance lands that support wildlife – against their premature conversion.
 - (a) Discourage proposals that would convert open space to other uses.
 - (b) The Commission reserves discretion to consider proposals involving the conversion of open space based on local conditions and in conjunction with ensuring orderly growth and development reflecting local habitat planning.
 - (c) Encourage the County of San Diego and incorporated cities to coordinate the designation and protection of open space lands and associated uses as community greenbelts and separators.

Commented [S8]: make explicit distinction between open space and ag

Commented [S9]: objective for open space is to protect and preserve and different from ag (protect and enhance)

Commented [S10]: Wildlife Coalition...

Commented [S11]: tie back into land use authorities' planning

Commented [S12]: telegraphing tool to land use authorities

3. ~~Protect and enhance agricultural lands and their uses.~~

~~(a) Discourage proposals that would convert any agricultural lands – including and of highest priority prime agricultural – or open space lands to other uses, unless such an action would not promote the planned, orderly, efficient development of an area or the affected jurisdiction has identified all prime agricultural lands within its sphere of influence and adopted measures that would effectively preserve prime agricultural lands for agricultural use;~~

~~(b) The Commission reserves discretion to consider proposals involving the conversion of agriculture based on local conditions and in conjunction with ensuring orderly growth and development. This includes considering the economic viability of agricultural uses within the affected territory.~~

~~(c) No harm provisions.~~

~~i) Lands otherwise qualifying as agricultural under Gov Code Section 56016 and prime agriculture under Gov Code Section 56064 shall not be subject to this policy and its limitations on conversions if left fallow, unsown, or disused for agricultural purposes at the present time and for more than 60 consecutive months.~~

~~ii) Lands otherwise qualifying as agricultural under Gov Code Section 56016 and prime agriculture under Gov Code Section 56064 shall not be subject to this policy and its limitations on conversions if their qualification commenced only within the last 60 consecutive months.~~

~~(d) Encourage landowners to establish and/or expand agriculture uses if permissible under zoning. This includes – but not limited to – the Commission considering proposals to extend municipal services in support of maintaining and enhancing agricultural uses.~~

~~(d) Recognize the uniqueness of agricultural uses in San Diego County to include above-ground and mobile production, such as nurseries, that merit separate considerations when applying State statutes.~~

~~Require rezoning of territory (city only) to identify areas subject to agricultural/preservation and planned development;~~

Commented [S13]: objective for ag is to protect and enhance and different from open space (protect and preserve)

Commented [S14]: opportunity for landowners to show LAFCO that ag is not cost-effective

Commented [S15]: makes explicit the sunset provided in statute with the addition of unsown and disused, i.e. long-time ag uses are no longer viable

Commented [S16]: does not penalize new ag ventures

Commented [S17]: addresses broad definition for prime ag in LAFCO law to include any land that produces an annual gross value of \$400 per acre (not net but gross...) under 56016(e)

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34. Follow San Diego LAFCO's adopted procedures when reviewing proposals that could effect agricultural and open space lands and provided herein as Appendix A. to define agricultural and open space lands and to determine when a proposal may adversely affect such lands.

Adopted: November 6, 1978
Amended: June 4, 1990
Amended: May 4, 1998
Technically Updated: January 1, 2001
Technically Updated: June 16, 2015

Cross-reference Appendix:

SAN DIEGO LAFCO PROCEDURES:
-Open Space and Agricultural Preservation

APPENDIX A

Open Space and Agricultural Preservation

The Cortese-Knox-Hertzberg Act requires LAFCOs to consider how adoption of spheres of influence or changes of local governmental organization could affect open space and prime agricultural lands. In determining spheres of influence, LAFCOs are directed to prepare a written statement of determinations with respect to the present and planned land uses including agricultural and open space lands (56425(e)(1)).

In reviewing and approving or disapproving proposals for changes of organization, LAFCOs must consider the effect of the proposal on maintaining the physical and economic integrity of agricultural lands (56668) and guide development away from existing prime agricultural and open space lands and towards areas containing non-prime agricultural lands — unless that action would not promote the planned, orderly, efficient development of an area (56377(a)). LAFCOs are further directed to encourage development of existing vacant or non-prime agricultural lands within a jurisdictional boundary or sphere of influence before approving a proposal that would allow development of open-space lands outside of the jurisdiction (56377(b)).

Definitions

Agricultural Lands: Agricultural land means land currently used for the purpose of producing an agricultural commodity for commercial purposes, land left fallow under a crop rotational program, or land enrolled in an agricultural subsidy or set-aside program (56016).

Prime Agricultural Land: Prime agricultural land means an area of land, whether a single parcel or contiguous parcels, that has not been developed for a use other than an agricultural use and that meets any of the following qualifications (56064):

1. Land that, if irrigated, qualifies for rating as class I or class II in the USDA Natural Resources Conservation Service land use capability classification whether or not the land is actually irrigated, provided that irrigation is feasible;

2. Land that qualifies for rating 80 through 100 Storie Index Rating;
3. Land that supports livestock used for the production of food and fiber and that has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the United States Department of Agriculture in the National Handbook on Range and Related Grazing Lands, July 1967, developed pursuant to Public Law 46, December 1935;
4. Land planted with fruit or nut-bearing trees, vines, bushes, or crops that have a non-bearing period of less than five years and that will return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than four hundred dollars (\$400) per acre; or
5. Land that has returned from the production of unprocessed agricultural plant products an annual gross value of not less than four hundred dollars (\$400) per acre for three of the previous five calendar years;

Open Space: Open space is any parcel or area of land or water that is substantially unimproved and devoted to an open-space use and designated on a local, regional or state open space plan as any of the conditions described in Section 65560(b)(1) through (6).

Procedure

The following criteria will be considered when reviewing a proposal that could adversely affect agricultural and open space lands:

1. The use and value of the proposal area and surrounding parcels;
2. Determination as to whether any of the proposal area is designated for agricultural preservation by adopted local plans, including Local Coastal Plans and the County Agricultural Element; and

3. Determination of:
 - A. Whether public facilities would be extended through or adjacent to any other agricultural lands to provide services to the development anticipated on the proposal property;
 - B. Whether the proposal area is adjacent to or surrounded by existing urban or residential development;
 - C. Whether surrounding parcels may be expected to develop to urban uses within the next five years; and
 - D. Whether natural or man-made barriers would serve to buffer the proposal area from existing urban uses.

Special Annexation Procedures for Williamson Act Territory (51243.5, 56738, 56752)

The Williamson Act provides that a property owner may enter into a contract with a county or city whereby the assessed property taxes are reduced in return for keeping the property in an agricultural preserve for a minimum of ten years. Except as provided in Government Code Section 51243.5, on and after the effective date of an annexation by a city of any land under contract with the county, the city shall succeed to all rights, duties, and powers of the county under the contract.

A city may refuse to succeed to a Williamson Act contract if either of the following conditions exist:

1. Prior to December 8, 1971 the land being annexed was within one mile of the city boundary when the contract was executed and the city filed a resolution protesting the contract with the board of supervisors;
or

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2. Prior to January 1, 1991: (a) the land being annexed was within one mile of the city boundary; (b) the city had filed a resolution protesting the contract with LAFCO; (c) LAFCO held a hearing to consider the protest; (d) LAFCO made a finding of inconsistency with future land use; and (e) LAFCO approved the city's protest.

Please refer to the applicable code sections for specific procedures regarding the annexation of Williamson Act territory.




From: [Hannah Gbeh](#)
To: [Simonds,Keene](#)
Subject: Farm Bureau Comments on Agricultural and Open Space Lands Policy
Date: Tuesday, July 28, 2020 10:01:08 AM

Dear LAFCO,

On behalf of the agricultural community within San Diego County, we would like to applaud the efforts of Executive Officer Keene Simonds in relation to updating the Agricultural and Open Space Lands Policy. Mr. Simonds has gone above and beyond to ensure the input from the agricultural community was heard and incorporated into this policy update. In addition to providing a presentation to our Board of Directors regarding LAFCO's efforts, he engaged our land use committee, including accepting and incorporating the majority of our requested policy revisions. It is imperative that policies differentiate agricultural land uses from open space land uses and the Farm Bureau supports the proposed policy, as presented.

Best,
Hannah Gbeh



HANNAH GBEH *Executive Director*
420 S. Broadway, Ste. 200, Escondido, CA 92025
Office: 760.745.3023 hannah@sdfarmbureau.org
Cell: 760-504-4109
  
The Voice of Local Farming

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From: [Dan Silver](#)
To: [Lockett, Tamaron](#)
Subject: Proposed Update to Open Space and Agricultural Lands Policy
Date: Wednesday, August 12, 2020 10:59:54 AM

August 12, 2020

Tamaron Lockett
Commission Clerk
San Diego County LAFCO
9335 Hazard Way, Suite 200
San Diego, California 92123

RE: Proposed Update to Open Space and Agricultural Lands Policy

Dear Chairperson Jacob and Members of the Commission:

Endangered Habitats League, a longterm stakeholder in San Diego regional planning efforts, appreciates the opportunity to comment on the proposed update. We support these changes as beneficial to open space, agriculture, and orderly growth. For example, extending agricultural considerations beyond "prime" agriculture better fits San Diego's farms. Also, taking note of our important regional habitat planning efforts like the County and City of San Diego MSCPs, Chula Vista MSCP, and Carlsbad HMP recognizes the value of these programs for conservation, infrastructure, and development.

Thank you for considering our views.

Yours truly,
Dan Silver

Dan Silver, Executive Director
Endangered Habitats League
8424 Santa Monica Blvd., Suite A 592
Los Angeles, CA 90069-4267

213-804-2750
dsilverla@me.com
<https://ehleague.org>

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County of San Diego

MARK WARDLAW
DIRECTOR

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KATHLEEN A. FLANNERY
ASSISTANT DIRECTOR

September 2, 2020

TO: Keene Simonds, Executive Officer
San Diego Local Agency Formation Commission

FROM: Eric Lardy, Chief
Advance Planning Division, Planning & Development Services

RE: REQUEST FOR GENERAL PLAN CONFORMANCE REVIEW PURSUANT TO
GOVERNMENT CODE SECTION 65402 FOR **“LAFCO Open Space and Agricultural Lands
Policy Update”**

This letter is in response to your e-mail dated August 7, 2020, requesting a General Plan conformance determination for compatibility with the County’s Agricultural Promotion Program and LAFCO’s Proposed Update to the Open Space and Agricultural Lands., dated August 3, 2020.

This request is from the San Diego Local Agency Formation Commission (LAFCO) to update the Open Space and Agricultural Lands policy, last updated in 1998. LAFCO has provided a draft document which includes several substantive revisions that collectively aim to better balance the Commission’s statutory direction to preserve agricultural and open space resources while reflecting local conditions and objectives. The Commission is now seeking a response from San Diego County for conformance with the General Plan, notably, conformance with the County’s Agricultural Promotion Program.

Adopted by the Board of Supervisors in 2017, the Agricultural Promotion Program established new agricultural use definitions and revisions to the animal use regulations in the County Zoning Ordinance. The new uses included agricultural homestays, agritourism activities, agricultural stores (small and large), microbreweries/micro-distilleries (small and large), fishermen’s markets, and agricultural packing and processing.

Planning & Development Services (PDS) reviewed the draft policy in conformance with the County’s General Plan Annexation Policies related to Open Space and/or Agricultural Lands, as identified below:

- LU-2.5 Greenbelts to Define Communities: Identify and maintain greenbelts between communities to reinforce the identity of individual communities.
- LU-4.5 Annexations with Incompatible Land Uses. Coordinate with LAFCO to oppose annexations by neighboring cities that would result in land uses incompatible with unincorporated lands.
- COS-1.4 Collaboration with Other Jurisdictions. Collaborate with other jurisdictions and trustee agencies to achieve well-defined common resource preservation and management goals.
- S-11.5 Development Adjacent to Agricultural Operations. Require development adjacent to existing agricultural operations in Semi-Rural and Rural Lands to adequately buffer agricultural areas and ensure compliance with relevant safety codes where pesticides or other hazardous materials are used.

Pursuant to Government Code Section 65402 and proposed policy update, PDS has determined that a finding of consistency with the County’s General Plan and Zoning Ordinance can be made. If you have any questions, please contact Mark Kieser at (858) 495-5357 or Mark.Kieser@sdcounty.ca.gov.

A handwritten signature in cursive script that reads "Eric Lardy".

Eric Lardy
Chief, Advance Planning

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From: [Blom, Erica](#)
To: [Lockett, Tamaron](#)
Cc: [Simonds, Keene](#)
Subject: Fw: Draft Update to Agricultural and Open Space Policy on LAFCO agenda
Date: Wednesday, September 23, 2020 11:53:38 AM

From: Jim Peugh <peugh@cox.net>
Sent: Monday, August 3, 2020 8:38 AM
To: Blom, Erica <Erica.Blom@sdcounty.ca.gov>
Cc: 'Andrew Meyer' <meyer@sandiegoaudubon.org>; 'Bill Tippetts' <billtippetts@gmail.com>
Subject: Draft Update to Agricultural and Open Space Policy on LAFCO agenda

Hello Ms. Blom,

The San Diego Audubon Society greatly appreciates the efforts of Mr. Simonds to incorporate language into your open space policy that will protect from development areas of the county that provide habitat for many native species of wildlife. Our region is extremely rich in wildlife, including many threatened and endangered species. Appropriate land use policies can significantly help them to survive. If they are ignored in land use decisions their future is very limited. We hope that LAFCO will incorporate the changes that he suggests.

Thank you for considering our comment.

James Peugh

Conservation Chair

San Diego Audubon Society

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From: [Blom, Erica](#)
To: [Lockett, Tamaron](#)
Cc: [Simonds, Keene](#)
Subject: Fw: Draft Update to Agricultural and Open Space Policy on LAFCO agenda
Date: Wednesday, September 23, 2020 11:55:01 AM

From: Bill Tippetts <billtippetts@gmail.com>
Sent: Monday, August 3, 2020 8:56 AM
To: Jim Peugh <peugh@cox.net>
Cc: Blom, Erica <Erica.Blom@sdcounty.ca.gov>; Andrew Meyer <meyer@sandiegoaudubon.org>; Laura Hunter <earthlover@sbcglobal.net>; Simonds, Keene <Keene.Simonds@sdcounty.ca.gov>; Mike McCoy <Mccoy4ib@aol.com>
Subject: Re: Draft Update to Agricultural and Open Space Policy on LAFCO agenda

Hello Ms. Blom,

I am writing to support the proposed revised language that Clarke's and prioritizes the preservation of open space, especially natural habitat and important agricultural lands.

San Diego County has been one of the leading regions for implementing programs that balance the needs for managed growth with open space conservation, primarily through the many Natural Community Conservation Plans/Habitat Conservation Plans.

However, it is also important that separate processes, such as LAFCO, complement those efforts. The proposed language would achieve that objective.

Regards,

Bill Tippetts
619-822-4323

"Patriotism is supporting your country all the time, and your government when it deserves it" - Mark Twain

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