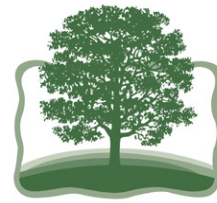




SIERRA  
CLUB  
SANTA LUCIA  
CHAPTER



North County Watch

Looking Out Today For Tomorrow

November 8, 2012

Board of Supervisors  
County of San Luis Obispo  
San Luis Obispo, CA 93406  
Via Email [boardofsups@co.slo.ca.us](mailto:boardofsups@co.slo.ca.us)

RE: Item 14 Amendments to the Ag Cluster Subdivision Ordinance

Dear Chairman Patterson and Honorable Supervisors,

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.

Our organizations support staff's recommendations for amendments to the Inland Ag Cluster Subdivision Ordinance. 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 support the other critical improvements to the ordinance, including: the elimination of the density bonus, qualifications regarding the 95% remainder, qualifying current Ag, water availability standards, clarifying buffer language, contiguous lot layout, and removal of Williamson Act parcels.

We believe the current amendments will clarify a number of controversial issues and will prevent the flagrant overreaching and outright abuse of the cluster ordinance that resulted in the very controversial Santa Margarita Ranch Ag Cluster. Ag cluster subdivisions can aide in preserving agricultural land for agriculture but projects such as the Santa Margarita Ranch and Laetitia Ag Cluster 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. Applicants and the public will benefit from these amendments.

The Ag Cluster amendment to Title 23 and Alternative 5 mimic the proposed Rural Plan Development Ordinance that was rejected by the Board in 2008. After two years in the public forum at Advisory meetings and other public meetings, the Board rejected the draft RPD Ordinance because of the extensive environmental impacts associated with the proposal. Of particular note were comments from representatives of CDF strongly objecting to the ordinance because of the tactical difficulties in defending numerous residential enclaves clustered in high fire areas throughout the County. The history of the rejected RPD Ordinance serves as a cautionary example of unresolved issues associated with expanding this type of idea.

Thank you for your consideration of our comments.



Susan Harvey  
President, North County Watch



Andrew Christie  
Director, Santa Lucia Chapter