



Protecting Marin Since 1934

April 6, 2018

Marin County Board of Supervisors  
3501 Civic Center Drive, Suite 339  
San Rafael, CA 94903

*Via electronic mail:* [BOS@marincounty.org/marinLCP@marincounty.org](mailto:BOS@marincounty.org/marinLCP@marincounty.org)

**Subject: Recommend continuing revisions for Agricultural Provisions in the Marin County Local Coastal Program Amendment, Board of Supervisors Hearing, April 24, 2018**

Dear Supervisors:

MCL is grateful for the opportunity to provide the following comments and recommendations for your consideration regarding the Marin County Local Coastal Program Amendment (LCP). MCL has participated actively in the process leading up to your hearing on April 24, 2018 and recognizes the significant effort and inclusive process that has been led to arrive at the Land Use Policy and Implementation Program that you are being asked to approve. This includes MCL's facilitating community meetings to explore the full range of views on particular issues with Community Development Agency and California Coastal Commission Staff. It also includes providing analysis and recommendations at numerous steps of the process to the Marin County Planning Commission, your Board, and the California Coastal Commission.

Given this considerable effort and the significant progress made on many issues, MCL does not take lightly voicing its concern for and disagreement with sections in the Implementation Program and specifically selected language around agriculture in the Coastal Commission Revised findings dated July 14, 2017. Until that point, MCL had voiced its support of the proposed solutions and language in the LCP and even communicated this to the California Coastal Commission in our letter dated October 20, 2016 stating:

“MCL wishes to convey its recommendation for Commission approval of the LUP and IP as proposed by the County of Marin for: 1) Agriculture Ongoing; 2) Retail Sales; 3) Processing; and 4) Inter-generational housing. In all four cases, County of Marin staff has developed carefully crafted performance measures and restrictions that will allow for these components to support the significant contribution Marin's family ranches and farms make in protecting Coastal Marin from development. Combined, they provide the individual agricultural producer and relevant local County of Marin departments the ability to make critical and real-time farming decisions, exercise entry-level scale for agricultural diversification, and house more than one farm family generation, doing it in a way that simultaneously protects Environmentally Significant Habitat Areas, safeguards against traffic and other operational impacts, and sets a finite limit of 27 additional housing units. In these four areas, MCL supports the County of Marin's proposed LUP and IP.”

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Regrettably, many of the revisions approved by the CCC have impacted the clarity for both the agricultural community and County of Marin staff to achieve this. As a result, MCL respectfully requests that you give serious consideration for continuing efforts to revise and improve those respective sections, returning the earlier clarity and removing the introduced ambiguity that is now in the version before you. In particular, MCL recommends that you not approve the language and sections around:

- “Ongoing Agricultural Activities” Versus “Development”: Marin County Community Development staff did a masterful job of listening to the concerns of the agricultural and environmental communities in crafting definitions of “ongoing agricultural activities” and “development.” MCL supported strongly the resulting provisions, including the clear definition of what would NOT constitute “agriculture ongoing,” based on objective criteria for determining intensification of water (irrigation installation) and land modification (e.g., terracing, > average 15% slope), or development for vineyard or cannabis production. “The definition of Grading” is adequately conditioned, as in Section 22.130.030 of the IP that was approved by the Coastal Commission on November 2, 2016. This and corresponding language provided people engaged in agriculture in Marin County the ability to adapt to rapidly changing climate and economic factors, while ensuring that our natural environment and resources are protected. The revisions made through the Coastal Commission and Staff findings of July 14, 2017 have introduced ambiguity for farming and ranching activities that MCL does not support.

To close, we offer as an underpinning to these recommendations, the goal of MCL’s Agricultural Policy Statement: “To continue to support the role Marin’s agricultural community plays in maintaining open space, protecting wildlife corridors, protecting water quality, managing carbon, preserving a valuable local heritage, and contributing to food security and the local economy.” We thank the County of Marin for leading efforts to achieve this goal through its LCP Amendment process and suggest that the CCC Revised Findings regarding agricultural revisions have compromised that goal and should not be approved.

Sincerely,



Kate Powers  
MCL President