

October 26, 2015



Protecting Marin Since 1934

Commissioners  
California Coastal Commission  
45 Fremont Street, #2000  
San Francisco, CA 94105

**Subject: Agricultural Provisions in Revised Marin County Updated LCP**

Dear Commissioners:

The Marin Conservation League has been protecting and working to enhance Marin County's natural environment, including its open space and agricultural lands, for over eighty years. MCL was a leader in supporting creation of the California Coastal Commission and continues to respect the efforts of the Commission, including Commission staff, in efforts to safeguard agriculture in Marin's coastal zone.

Early this year, MCL facilitated a dialogue in the environmental and agricultural communities in Marin regarding Commission amendments to the Land Use Plan and proposed Commission staff edits relating to Implementation Program (IP) applicable to agriculture in an Update to Marin County's LCP. We particularly appreciated Commission staff's participation in a combination Skype/conference call on January 30 that gave us an opportunity to explore the full range of views on particular issues. These sessions provided insight into the specific concerns of the differing points of view. Although we did not arrive at a consensus on all issues, many areas of common ground were found.

These are areas that were of particular concern that have been addressed in the Revised Marin County LCP Update approved by the Marin County Board of Supervisors on August 25, which MCL supports:

1. **Accessory Agricultural Structures and Activities:** Commission staff proposed including the term "and necessary for" in the tests in the definitions of "Accessory Agricultural Activities" and "Accessory Agricultural Structures." To make "necessary for" in this list of tests an additional, rather than an alternative, requirement would muddle the role of activities that may contribute to the financial viability of agriculture in Marin and create uncertainty by implying that such uses or facilities may, in some cases, be unnecessary and thus require individual producers to demonstrate "necessity" on a case-by-case basis. We support the County's use of "or necessary for" as an alternative test in the series used to determine what constitutes an accessory agricultural activity or structure.
2. **Retail Sales and Small Processing Facilities:** To create economies of scale and minimize the number of processing facilities MCL supports allowing small production facilities (under 5000 square feet) to utilize products from the farm shed, defined as Sonoma and Marin counties, e.g., making cheese from a combination of milk from cows on one dairy

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and sheep from another dairy. With regard to small (under 500 square feet) retail sales onsite, we support the County proposal which would limit the products sold to those produced onsite or on other Marin properties owned or leased by the operator and require the operator to be “directly involved in their production.” MCL also suggests that retail structures be subject to design review or to design review standards established by the county.

3. **“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, as well as CCC staff, in crafting definitions of “ongoing agricultural activities” and “development.” MCL strongly supports the resulting provisions, including the definitions of “agriculture ongoing,” “average agricultural slope,” and “grading” ” in Section 22.130.030 of the IP. They will provide the flexibility to people engaged in agriculture in Marin County to adapt to rapidly changing climate and economic factors while protecting our natural environment and resources.
4. **Farm Tours as a Principal Permitted Use.** Perhaps inadvertently the Commission staff recommended edits to the Updated Marin IP would have required farmers and ranchers to obtain a permit if they were to charge for giving farm tours. MCL believes educating the public about agriculture is important and that a rancher or farmer or ranch or farm operator, who takes the time to give a tour, should be able to charge for the tour.

We appreciate the opportunity to comment on the Revised Marin LCP Update and urge your approval of it.

Sincerely,



Kate Powers, President