



Post Office Box 809  
Point Reyes Station  
California 94956  
T 415 663-1158  
F 415 663-1099  
www.malt.org

November 29, 2018

Marin County Board of Supervisors  
3501 Civic Center Drive, Suite 329  
San Rafael, CA 94903

**Re: Local Coastal Program Amendments Concerning Agriculture in the Coastal Zone**

Dear Supervisors:

On behalf of the Marin Agricultural Land Trust, I am writing to express both our appreciation and concern regarding the proposed revisions to sections of Amendment 3 of the proposed Local Coastal Program (LCP) Implementation Plan you will consider at your Board meeting on December 4, 2018. These revisions are intended to resolve a relatively small set of issues that caused your board to defer accepting Coastal Commission modifications to LCP Amendments 3 and 7 that were made when the Commission accepted its staff's findings in July 2017.

For years, our staff worked closely with county planning staff, California Coastal Commission (Commission) staff, and representatives from numerous local interest groups including Marin Conservation League, Environmental Action Committee of West Marin, Marin County Farm Bureau, and others to help craft compromise language approved by the Commission at its November 2016 hearing in Half Moon Bay. The compromise language struck a balance between protecting sensitive habitat areas and providing certainty to agricultural operators in the Coastal Zone. The language provided an exclusion from permitting for certain agricultural activities that would be considered "ongoing agriculture" and listed specific agricultural activities that would constitute "development" under the Coastal Act and would be subject to coastal permitting. These "development" activities included terracing of land for agricultural production, preparation or planting of land for viticulture and cannabis, and preparation of land for planting on slopes greater than 15 percent. These activities would have potential significant impact to the agricultural and natural resource values of Marin County's Coastal Zone and this approach directly addressed the concerns regarding environmental protection expressed by Coastal Commissioners, including former Commissioner Shallenberger, during earlier public hearings. Unfortunately, the Commission modified this compromise language through Revised Findings proposed by Commission staff and adopted by the Commission at its meeting in July 2017.

While we agree the current proposed language generally restores this provision, it has been brought to our attention that one of the activities on this list is vague and could benefit from some clarification. MALT believes the "Installation or extension of irrigation systems" should be clarified to make clear this pertains only to irrigation systems for the type of crops appearing later in the list that would institute intensification of agricultural use and **not** pertain to water systems related to grazing of livestock. New and extended livestock watering systems, including new water troughs, have very little impact to the





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land and are beneficial to the protection of both agricultural and natural resources in the Coastal Zone as they allow improved grazing practices and help our producers keep livestock out of creeks and other waterbodies. MALT suggests the item read “Installation or extension of irrigation systems that support viticulture or cannabis production.”

MALT applauds the county’s efforts to include clarifying language in the amendment to exclude not for profit agricultural tours in the Coastal Zone from permitting requirements and to allow producers to be compensated for their time for education tours. MALT holds such tours periodically on our easement-protected properties in order to educate the public on the benefits of protecting agricultural land and to raise funds to support our successful conservation program. This support has been critical to helping MALT protect more than 52,500 acres of agricultural land in the county.

We appreciate your staff’s significant efforts to resolve the issues created by the Coastal Commission’s action in 2017 and appreciate your consideration of our suggested modification.

Respectfully Yours,

Jamison Watts  
Executive Director

Cc: MALT Board of Directors

