



MARIN COUNTY FARM BUREAU

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April 13, 2018

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

Sent via email to BOS@marincounty.org

Re: Proposed Local Coastal Program Update

Dear Supervisors,

Marin County Farm Bureau (MCFB) has been deeply involved in the decade of discussions, hearings and workshops arranged by Marin County Community Development Agency (CDA), as well as the California Coastal Commission (CCC), to ensure the interests of Marin's farmers and ranchers are represented and respected throughout the Local Coastal Plan (LCP) update process. Although the Marin County Board of Supervisors (BOS) and staff listened carefully, worked very hard, respected the needs of our rural communities and continuously proposed language whereby agriculture in the coastal zone could survive, the final LCP amendment is unacceptable. MCFB urges the Marin County Board of Supervisors to reject the entirety of the amendments as currently presented by CCC.

Modifications made by CCC staff to the California Coastal Commission's decisions following its November 2, 2017 public workshop have increased farmer and rancher frustration. These staff changes reinterpreted the outcome of the November meeting and listed several things that are at odds with prior CCC determinations, including requirements for farmers to obtain permits for what used to be ongoing agricultural activities that could now be reclassified as "development" - such as adding another pipe to an existing irrigation system, or switching from grazing to crop production.

Other concerns have arisen, including the ambiguity of terms, such as the true meaning and interpretation of "legally established existing agriculture," or "actions that intensify the use of land and water," or "what payments or reimbursements are to be allowed for educational tours" or "any development shall be accessory to, in support of, and compatible with agricultural protection." Without standards in place, a number of determinations are left up to the judgment and discretion of the CCC staff on a case-by-case basis. And, as you are aware of, CCC has refused to hire even one staff member who has agricultural experience. If these amendments are approved, Marin County farmers and ranchers would be forced to obtain permits to farm.

In essence, the CCC staff is saying just about anything new or different that we do on our farms is "development", so the intent is to only allow and lock in what farmers and ranchers are doing today under the heading of existing use. Such a policy will inhibit present day and future farmers from making a living, or being able to compete with their counterparts in in-land areas not encumbered by such permit restrictions. If we are not allowed to change or add new technology, advanced farm practices, change crops or make other modifications without a permit, we are in trouble. Maintaining the status quo is not good enough. We have to be allowed to make quick business decisions and take care of the land or we are out of business.

Knowing that obtaining a Coastal Development Permit (CDP), or Coastal Permit, is a long, arduous and expensive process, and dealing with CCC staff having no agricultural experience or expertise, few farmers and ranchers will elect to change what they do. Ranches would lose resiliency because of the inability to change crops in response to climate or market changes and the next generation farmers and ranchers with dreams of diversifying (changing the intensity of use) and connecting with the local food system would be shattered.

With Marin County as an initial test case, if anti-agricultural CCC rules are allowed to stand, these permit requirements could be the precedent mandated for all those farming in designated coastal areas of the state along an 800-mile shoreline within the CCC's jurisdiction. MCFB requests that this BOS not allow Marin County to be the precedent to use against farmers and ranchers elsewhere.

The 1982 Marin County LCP is protecting Marin's coastline. Excessive development of ranch lands in violation of the Coastal Act is not a problem and has not been a problem. There is no rational reason to impose new, onerous and debilitating restrictions on the ranch lands that have not been a problem. Certainly, specific sections could be updated without wholesale change, and new restrictions could be limited to areas where new restrictions are needed.

MCFB has heard from activists groups supporting the undefined and unnecessary restrictions added by CCC staff. The threat is that if this BOS rejects these LCP amendments, the CCC will begin to more rigorously enforce the current LCP. We hope we can count on the support of this BOS if this threat of retribution becomes real. Up to now, ranchers and farmers can implement changes, vary crops, add irrigation, install water systems, grade roads, build fences, repair buildings, implement USDA Natural Resources Conservation Service Environmental Quality Incentives Program projects, MALT conservation projects, RCD conservation projects as well as other minor land modifications, without a Coastal Permit. We believe that this 36-year interpretation of the current LCP is appropriate, that the coastal zone is properly protected, and that this longstanding interpretation should continue.

MCFB greatly appreciates the continuous support for Marin's agriculture this Board has given over the years. Your decision to reject the LCP on April 24th, 2018 will not only benefit farmers and ranchers in the coastal zone, it will benefit all agriculturists throughout the County for two reasons: 1) Anti-agriculture activists will push to have any new restrictions placed on ranchers and farmers in the coastal zone applied to all of Marin's agricultural land, and 2) Critical mass is needed to support the agricultural ranching and farming families in Marin. The loss of coastal farms and ranches would harm the entire agricultural economy by the loss of necessary supporting businesses. Certainly, supporting agriculture in the coastal zone will benefit more than just those of us engaged in food production. Healthy local foods from coastal farms provide Marin County with more resiliency, increased food security, a reduced carbon footprint and a cultural landscape appreciated by many.

Thank you,



Kevin Lunny
President
Marin County Farm Bureau