

From: Wendy Krupnick <wlk@sonic.net>
Sent: Wednesday, June 29, 2022 10:15 AM
To: Gary Helfrich <Gary.Helfrich@sonoma-county.org>; Cecily Condon <Cecily.Condon@sonoma-county.org>; Caitlin Cornwall <caitlin@sonomaecologycenter.org>; greg99pole@gmail.com;
Jacquelynn Ocana <Jacquelynn.Ocana@sonoma-county.org>; Eric Koenigshofer
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Subject: Local Coastal Plan comments

EXTERNAL

Dear Sonoma County Planners and Planning Commissioners,

Community Alliance with Family Farmers (CAFF), Sonoma County chapter is submitting the attached comments regarding the draft Local Coastal Plan. These are in addition to the comments submitted in March 2022 and December 2021.

Thank you for your consideration of our comments.

Wendy Krupnick

Vice president, CAFF Sonoma County



June 29, 2022

To: Sonoma County Planning Commission
Planner Gary Helfrich
Cecily Condon

cc: Permit Sonoma
Tennis Wick, AICP Director

Re: Sonoma County Local Coastal Plan (LCP) Update, Agricultural Resources Element,

Dear Planning Commissioners, Mr. Helfrich and Ms. Condon,

The Community Alliance with Family Farmers (CAFF) Sonoma County is deeply disappointed and concerned that none of the comments and recommendations we previously submitted on December 9, 2021 and March 3, 2022 have been addressed or incorporated in the current draft Local Coastal Plan. We feel that the Agricultural Element as written is very likely to eliminate the potential for future small and medium scale agricultural production in this region and will facilitate the development of lands currently zoned for agriculture.

Our previous letter sites many examples of how the draft shifts focus from farm land preservation to offering conditions for subdivision and development. It also sets requirements for commercial viability for land to stay in agricultural designation. It would be a very dangerous precedent for crop profitability to be required for land to stay in agriculture. If such a requirement had been in place when Sonoma county's prunes were no longer profitable the land would have been developed and we would not have today's wine industry. Ag land must be preserved for the production of food and fiber long term and not changed due to market and production forces which will continue to vary over time.

As we have said earlier, small parcels have the most potential for production, as well as affordability, for new farmers/ranchers and research demonstrates that small operations can have much higher revenue per acre than larger parcels. Today's markets value pastured livestock and poultry, locally grown vegetables, berries, cut flowers and other crops that are well adapted to the coast and very appropriate for small parcels. Yet this draft presents many opportunities to remove small parcels from ag designation and build on them. In the coastal zone where there are large areas of shallow soil and limited water, the small pockets of ag land with deeper soils and potential for holding more water could and should be critical assets for increasing food security in this remote region.

The proposed minimum parcel sizes for Diverse Agriculture and Land Extensive Agriculture of 160 and 640 acres respectively would make farming and ranching completely out of reach for any but the very wealthy and would preclude the kind of careful land management that is more suited to smaller parcels. Please remove these minimum parcel sizes and leave the requirements for these categories the same as in the rest of the county.

We also remind the Planning Commissioners that Section 30241 of the California Coastal Act requires that the "maximum amount of prime agricultural land be maintained in agricultural production to assure the protection of the areas' agricultural economy," and that only in cases of conflict shall metrics such as "viability" be used. And that Section 30241.5 of the California Coastal Act only applies, "If the viability of existing agricultural uses is an issue pursuant to subdivision (b) of Section 30241 as to any local coastal program or amendment to any certified local coastal program submitted for review and approval under this division." The reliance then, in Section 1.1 Goals, Objectives and Policies, on this metric for determining which areas along the coast can be converted to non-agricultural uses misses the intent of this section of the California Coastal Act.

Therefore, we ask that the following sentence be removed from GOAL C-AR-1, "Maintain the maximum amount of agricultural land in parcel sizes that are large enough to sustain a viable commercial agricultural

operation." That Policy C-AR-1a (3) be removed, "The resulting parcels for agricultural use shall each be of a size that can support a viable agricultural operation per California Coastal Act Section 30241.5." And that any other reliance on viability as a metric be removed.

Also, please note that the focus in the Code for LEA and DA zones is on lands capable of relatively low production per acre of land, as well as on small acreage intensive farming. And that "in the DA zone, a lot line adjustment may reduce a lot to less than ten (10) acres," which is substantially less than the amount listed in Table C-AR-2 of the updated LCP. Creating unrealistic metrics for farmers to follow, metrics which are counter to the Code, creates a clear conflict of the LCP with the current regulations and so the LCP should thusly be updated to reflect the expectations set forth in the Code.

The language of the LCP must be in line with current codes, which affirm the value of all parcel sizes in coastal zones and strengthen protections for future agricultural production.

We ask the Planning Commission to direct staff to revise the LCP Ag Element and renew our offer to meet with staff to offer more detailed recommendations.

Thank you for your attention to these comments.

Sincerely,

Wendy Krupnick, Vice President, CAFF Sonoma County