

TO: Erika Leachman, Staff, and GVPAC Committee Members
FROM: Bonnie Freeman, GVPAC Committee Member
DATE: July 5, 2011
RE: Substantive Exceptions to Initial Draft Plan: Agricultural Land Uses
Section II, E, pages 77-92

I would like to commend the Planners on the overall task of drafting the latest Administrative Draft for GVPAC Review dated June 1, 2011. In general, I found that my comments and suggestions were, for the most part, integrated into the Urban Agricultural section, as well as those favored and/or suggested by the committee and community as a whole.

Reading the letter from the So Patterson Flatlands (Sub-area) I cannot help but be concerned that Policy LUA-EGV-2.7 eliminates the individual property owner's ability to submit a General Plan amendment between General Plan updates. I would like to know if that is absolute.

In general I endorse the Initiation Draft Plan, with the following substantive exceptions:

1. I move that the motion to endorse the Initiation Draft Plan include the following substantive exception that the following language **be added to the bullet list of "often-cited barriers" on the top of page 79.**

- Some Coastal Commission restrictions and costly permitting actions can be inhibitive to coastal farmers and operations that seek to innovate, diversify, and/or attract new owners

Argument: As far as the South Patterson Sub-Areas, this is cited as a major factor for many of the operations that feel squeezed financially and unable to go forward or modernize due to many of these barriers. I feel adding this to the list states a reality, just as the others do.

2. I move that the motion to endorse the Initiation Draft Plan include the following substantive exception that Item #3 under **Action LUA-EGV-2A: Urban Agriculture Land Use Designation** be amended to state "Retain the **historic, cultural, and visual characteristics** of the urban agricultural areas and retain visually diverse landscapes, including structures, public services, transportation facilities, and utilities,"

Argument: By taking out the word "resources" and designating all the elements as characteristic it serves to support the GVPAC and community's stated commitment to preserving the character of urban agriculture. Plus it is ingenuous to think that agriculture needs to be a visual resource when in fact that is not the purpose, even while in the growing season it is appealing. Take that burden off the grower's plate, they have enough trouble growing in an urban environment.

3. I move that the motion to endorse the Initiation Draft Plan include the following substantive exception that Item #6 under **Action LUA-EGV-2A** be amended in the 2nd paragraph to read: "The **uses should play a complementary** role to the primary agricultural use(s), and promote and support sustainable agricultural operations, and enhance the **viability** of urban agriculture as a business."

*Argument: I feel that uses as a "supporting" role to prime agriculture uses is too strong and too restrictive for many of the growers, particularly those who only have floral operations. I agree with the Flatlands operators who wrote that there should be more uses allowed and while it's my opinion that it be kept open for ideas to discuss with County Planners when ideas come up, I feel the word "**complementary**" gives more room to be creative and less restrictive to the grower.*