



NAPA COUNTY FARM BUREAU

BMAN/FILE

HILLARY

RECEIVED

SEP 21 2006

NAPA CO. CONSERVATION
DEVELOPMENT & PLANNING DEPT.

September 15, 2006

Ms. Hillary Gitelman
Napa County Conservation, Development and Planning Department
1195 Third Street
Napa, CA 94559

RE: Farm Management Zoning Ordinance

Dear Hillary,

The Farm Bureau Board reviewed the draft farm management zoning ordinance and strongly supports the effort to include farm management in the definition of agriculture and clearly allow farm management operations to be sited in the Ag Preserve and Ag Watershed zones.

The Farm Bureau Board recommends two small revisions to the draft ordinance, which are highlighted in blue in the attached document. The first change is relative to the 75% rule and amends the text to refer to "acres farmed" and not "properties". The Agricultural Commissioner is able to track both statistics, but "acres farmed" is a more direct linkage to insuring that the farm management operations are predominately in Napa County.

The second change adds a sentence after 18.08.040 E. 5 stating,

"Notwithstanding the foregoing, where a farm or ranch is owner-operated, such owners are permitted to operate, maintain, and store farm machinery equipment, vehicles, and supplies used exclusively for agricultural cultivation or ranching as an Accessory Use as defined in section 18.08.020."

This recommendation clarifies that section 18.08.040 E. 1-5 pertains to farm management companies and does not apply to owner-operated farms, as there is a distinct difference in the potential impacts of owner-operated farms and farm management for hire. The Board of Supervisors asked for parameters for professional farm management for hire operations, and that is what section E 1-5 accomplishes. While we strongly support amending the definition of agriculture to include professional farm management, we do not believe that the farm management definition should be universal to all farms. Farming is clearly defined in sections A., B., C. and D. of 18.08.040 and adding this recommended sentence further clarifies the distinctions.

Our discussion of this issue also surfaced concerns about monitoring and enforcement and the cost of compliance with building and fire codes.

Years of discussion, review and analysis have resulted in a viable approach to clarifying farm management as an essential and integral part of agriculture. If the changes to the definition of

agriculture recommended by Farm Bureau are made, we believe the proposed ordinance will provide a sensible clarification for all farm management uses in Ag Watershed and Ag Preserve zones, while protecting agricultural lands from non-agricultural development.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Al Wagner', with a stylized, flowing script.

Al Wagner
President

cc: Napa County Farm Bureau Directors