



FARM BUREAU San Diego County

The Voice of Local Farmers
Serving San Diego agriculture since 1914

July 31, 2019

Eric Lardy
Chief, Advanced Planning
County of San Diego
Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Dear Mr. Lardy,

The San Diego County Farm Bureau is pleased that the County of San Diego's Department of Planning and Development Services (PDS) has launched the Land Development Code Comprehensive Update (Update). As you are aware, farmers occupy substantial acreage in the county. In many cases the launch, expansion, or modification of a farming enterprise will trigger the need for a permit issued by PDS. It is our hope that the Update will result in a process that is easily understood and navigated by farmers.

Our organization will be an active participant throughout the Update process. Though you are still in the earliest phase, we are submitting this letter to give you our initial thoughts on how the Update can address issues of importance to the farm community. Our comments are in two parts; structural changes to the code and items that could be described as implementation improvements.

Structural Changes to the Code

1. Make the Code easier to understand. Farmers will have few contacts with PDS and limited need to work with the Code. When these occasions do occur, the Code should be easily understood by any user.
2. The Code should not be ambiguous and provide certainty to users.
3. Each of the permitting processes should have a clear and easy to follow path.
4. The existing matrix for allowed animal uses is cumbersome and confusing.
5. When appropriate, development standards for agriculture should vary from more restrictive residential and commercial standards.

6. Create a stand-alone agricultural grading and clearing ordinance that encourages the establishment and expansion of farms while sensitive to environmental constraints.
7. All agricultural references should be included in a definitions section.
8. Format an index that identifies where each agricultural provision resides in the Code.

Implementation Improvements

1. Provide a pre-application meeting option at a reasonable or no cost.
2. Provide applicants with a comprehensive list of requirements so project feasibility can be figured easily.
3. Reduce the time and cost needed to process and issue a permit.
4. Once a phase of a permitting process is complete, it should be honored (no “second-bite”).
5. Maintain training so designated and accessible PDS staff members are knowledgeable on the sections of the Code that pertain to agriculture.
6. Coordinate with other agencies (fire, schools, water, etc.) so permit processing is not hindered or delayed.

Thank you for reviewing our comments and we look forward to helping improve the Code and the affiliated processes.

Sincerely,



Eric Larson
Executive Director