



COMMITTEE FOR
GREEN FOOTHILLS

April 24, 2018

Santa Clara County Planning Commissioners
Members of the Valley Agricultural Plan Task Force

70 W. Hedding Street, 7th Floor
San Jose, CA 95110

Re: Santa Clara Valley Agricultural Plan

Dear Santa Clara County Planning Commissioners and Members of the Valley Agricultural Plan Task Force,

Congratulations to the County on the adoption of the Santa Clara Valley Agricultural Plan (Plan). The Santa Clara Valley Audubon Society (SCVAS) and the Committee for Green Foothills (CGF) appreciates the work of the County and Open Space Authority in its efforts to better protect Santa Clara Valley's remaining agricultural land and encourage a more robust agricultural economy.

While the Plan has many excellent recommendations, we would like to call your attention to aspects of the Plan that may be lacking compatibility with the goal of preservation of Santa Clara County's agriculture and farmlands. We do so with the intent of helping County Supervisors, Commissioners, staff, consultants, and Agricultural Preservation Task Force members in the identification of potential conflicts as implementation is prioritized and moves forward.

Ensure cluster subdivision requirements avoid fragmentation of agricultural landscapes.

Cluster subdivision requirements on agricultural lands provide an incentive to convert farmland with the rationale being an easement on the remaining farmland. It is important to explore how this mechanism would avoid fragmentation of agricultural landscapes.

Seek to locate farmworker housing inside cities' urban service areas wherever feasible.

The need for farmworker housing is indisputable. In appropriately citing farmworker housing, we must keep in mind the workers need for proximity to adequate services.

Ensure implementation of the Plan aligns and complies with LAFCo law and regulatory authority.

The Santa Clara County Local Agency Formation Commission (LAFCo) is the state mandated agency that is responsible for evaluating and approving city boundary changes that may cause the conversion of agricultural land to other uses. A number of the sub-areas of the Agricultural Resource Area are adjacent to urban lands. As noted in the Plan, these lands are extremely vulnerable to development over the next 30 years and, in some

cases, will require LAFCo approval. In fact, the cities of Morgan Hill and Gilroy had recently planned for boundary changes that would have converted 1,350 acres of farmland converted to other uses.

Understand the Plan's potential impacts to LAFCo's jurisdiction, regulatory framework, and permitting process.

County staff and the Agricultural Preservation Task Force should invite LAFCo staff to present their role in protecting farmland in Santa Clara County and their policies that are directly relevant to the work of implementing the Plan. As part of the presentation, the Task Force may wish to request:

- a map to delineate and visualize the various boundaries and potential for expansion by the cities of Gilroy, Morgan Hill and San Jose
- a summary of analysis related to recent applications to LAFCo that sought to expand Urban Service Areas (USA) and convert agricultural land to other uses
- the rate and scope of conversion of agricultural land in the county, and whether allowing the payment of agricultural land mitigation fees might encourage conversion of agricultural lands and whether it is likely to have the effect of driving up the price of farmland and deterring long term investments in agriculture.

We thank you for your consideration of these suggestions to help in the successful implementation of the Plan.

Sincerely,



Shani Kleinhaus, Ph.D
Environmental Advocate
Santa Clara Valley Audubon Society



Alice Kaufman
Legislative Advocate
Committee for Green Foothills

CC: Board of Supervisors