

From: Rose Taylor <roseferritaylor@yahoo.com>
To: <bos@co.mendocino.ca.us>
Date: 4/3/2017 10:04 AM
Subject: Transferability of permits

Mendocino County
Board of Supervisors
501 Low Gap Road, RM 1010
Ukiah, Ca 95482



Honorable Board of Supervisors,

Thank you for all your efforts in passing a MCCO ordinance. I respectfully ask that you review the implications of this section as it currently stands:

Section 10A.17.070 (K): Non-Transferability of Permits. All Permits are non-transferable to another person, except that the Permittee may transfer the Permit to a spouse/domestic partner, child, parent, or, for estate planning purposes, to a trust in which the permittee serves as a trustee, provided the trust existed on or before January 1, 2016, which transfer shall not be deemed a change in ownership for purposes of this Chapter.

Like succession planning in any sort of business, continuity of stewardship & leadership is important to permittees who have gone through such great efforts to obtain these permits. Thus it is reasonable that the permittee will want the person with the most experience & applicable skills to succeed to be designated as the transferee, rather than it being based strictly on their kinship.

In many ways the current language discriminates against those that do not have a partner, children or parents. Or that do not have a partner, children or parents with the good health, availability, and expertise to step into this type of role. If a permittee is unable to keep farming due to their health for example, it's likely that their spouse/partner will be helping to care for them. Or if a permittee wants to retire, it's likely that their spouse/partner will want to move or retire with them. Similarly, their children may not live in the area, or their parents may not be in good enough health to assume the massive responsibility to run a farming operation and maintain good-standing compliance.

In some cases there are family farms with multiple generations pitching in, but often that includes some combination of siblings, son-in-laws, daughter-in-laws, nieces, and nephews where it seems transferability to those that are skilled in the trade should be an option. Thank you for reviewing this issue and looking at the implications for the permittee if transferability is not extended to include a designee of their choice, or additional family members.

Thank you.

Sincerely,

Rose Ferri-Taylor