

URBAN AGRICULTURE: ISSUES TO BE RESOLVED

The following is a distillation of the issues that have been raised about the proposed urban agriculture standards and will be used as a starting point for discussion at the Urban Agriculture Task Force meetings. This document has been updated to include the input received at the November 13, 2013 task force meeting.

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COMMUNITY GARDENS (REVISED FROM 11/13)

1. Should the sale of produce grown on-site be permitted from a community garden in a residential area?

Comments from the Task Force Meetings and Staff's Response

Number	Comment/Issue	Response/Suggested Revision
From the 10/9 Meeting		
1	The task force agrees that community gardens should be allowed in residential areas.	The draft will continue to identify community gardens as a permitted use in residential zones with the understanding that some of the specific standards and permitted activities are still under discussion.
2	Yard sale signs may only be posted on private property. Cannot be posted in the public right-of-way (e.g. sidewalk, street signs, and utility poles).	Standard added requiring compliance with the Sign Code. See draft changes to Sec. 6.6.5.G.5 below for details.
3	Allow online sales from urban farms only.	Revise the draft to stipulate that urban farms only may conduct online sales. See draft changes to Sec. 6.6.5.G.6 below for details.
4	Make a distinction that online sales are for shipping out, not for pickup by the customer.	See draft changes to Sec. 6.6.5.G.6 below for details.
5	Farmers' market should be the conduit through which surplus produce from a community garden.	Requires further discussion and consideration by the task force.
6	Create a farm stand use which is separate and distinct from and generally more restricted than a farmers' market. A farm stand is restricted to selling produce grown on-site only whereas goods from various locations would be permitted at a farmers' market. Operating a farm stand may be a more acceptable accessory use to a community garden and urban farm than sales being conducted similar to a yard sale event.	Requires further discussion and consideration by the task force. Clarification needed as to how the task force thinks any farm stand regulations would substantively differ from the draft standards provided in Sec. 6.6.5.G (see below). Additional changes to the definition of community garden may be required based on the results of this discussion.
From the 10/23 Meeting		
1	Require signs to include the address of the event to assist in identifying who is responsible for a sign if it is not removed in a timely fashion after the event is over.	Glenn Moyer (staff contact for the Sign Code Committee) was consulted. The following is a summary of his response: <ul style="list-style-type: none"> • The sign code generally does not allow off-site signs except for billboards, some real estate signs, and directional signs for hospitals. • There are also restrictions on off-site

Number	Comment/Issue	Response/Suggested Revision
		<p>signs near residences.</p> <ul style="list-style-type: none"> • All the little farmer's market signs you see around town are illegal. • What's referred to as a temporary sign in the sign code is limited to a banner attached to a building. A-frame signs, while portable, are considered permanent and again, must be onsite. • An amendment to allow farmer's markets to have off-site signs could run into constitutional issues (as could our real estate sign regs).
2	The farm stand use standards should mimic how a "lemonade stand" operates.	Under consideration.
3	Provide a comparison of the current and proposed regulations.	See the "Urban Agriculture: Comparison of the Current and Proposed Regulations" document
From the 11/13 Meeting		
1	Use the recently adopted yard sale regulations (Ruth Beeker via email)	Proposed Sec. 6.6.5.G.3 is based on the recently adopted yard sale regulations.

Revised Proposal (11/27/13; proposed new Sec. 6.6.5.G):

[Notes: 1) The following is staff's attempt at a compromise position that takes into consideration the comments and issues raised at the task force meetings; and, 2) The following applies to the accessory sale of products grown on-site from residences, community gardens, and urban farms.]

G. Sale of Products Grown On-Site. The accessory sale of products grown on-site is permitted subject to the following:

1. Sales are limited to products grown on-site, including produce and when permitted by Section 6.6.5.F, *Keeping of Small Farm Animals*, eggs from chickens raised on-site;
2. On-site sales are limited to the hours of 7 a.m. to 5 p.m.;
3. On-site sale of goods is restricted to no more than four advertised events per year. An event shall not occur more than three consecutive days. For the purposes here, an "advertised event" is one in which the homeowner or organizer advertises the sale online, in the newspaper, or signs posted off-site in the neighborhood;
4. Accessory structures associated with the product sales, such as booths and awnings, are exempt from Sections 6.6.1.C and 6.6.3.B and may be located in front of the principal use or building. All accessory structures associated with

the product sales, signs, and other evidence of the sale shall be removed at the end of each event;

5. Signs associated with the sale shall comply with Chapter 3 (Sign Code) of the Tucson Code; and,

6. The packaging and shipment of products grown on-site to customers off-site is permitted as an accessory use to an urban farm use only and is exempt from Sections 6.5.5.G.2 & 3.

2. Should the keeping of small farm animals be permitted from a community garden?

Issue: It is possible that any animals kept on a community garden will not be properly cared for since there is not constant supervision or someone readily available to respond should something happen.

Comments from the Task Force Meeting and Staff's Response

Number	Comments/Issues	Response/Suggested Revision
From the 10/9 Meeting		
1	Can the type of animals be limited? Restrict to chickens only.	Yes, it is possible through the proposed revisions to restrict the type of animals permitted at a community garden. Further discussion and consideration by the task force is required to determine whether this is a recommended approach to address the issues.
2	Consider restricting the number permitted in community gardens.	Yes, it is possible through the proposed revisions to restrict the number of animals permitted at a community garden. Further discussion and consideration by the task force is required to determine whether this is a recommended approach to address the issues.
3	Consider requiring an application and fee when proposing to keep small farm animals.	Yes, it is possible through the proposed revisions to require an application and fee. Further discussion and consideration by the task force is required to determine whether this is a recommended approach to address the issues.
4	It is difficult to identify who and how to contact the person responsible of a community garden to report a complaint?	Add a standard requiring a sign indicating who and how to contact the manager of the community garden. The sign must be posted conspicuously so that is visible from outside the community garden.
From the 10/23 Meeting		
1	Further research is needed regarding how community gardens police themselves and	See the attached document titled "Community Gardens."

Number	Comments/Issues	Response/Suggested Revision
	whether there are any community gardens in town that presently allow the keeping of small farm animals. One task force member stated that she knew of one community garden that kept chickens.	
2	When located on City property, is a contract or agreement with the City required? Does the City require the managers of the community garden to have a one million dollar liability coverage like what is required of other outside groups using City-owned property.	Yes, a memorandum of understanding (MOU) is required (see attached MOU). Re: liability coverage – The City’s Parks and Recreation Department does not require liability coverage when the community garden in on City parkland. Staff will contact the Real Estate Department to see if liability coverage is required on other types of City-owned property. (Incidentally, Gina Chorover, Chair of the Community Gardens of Tucson (CGT), said that CGT has a \$1 million liability policy.)
From the 11/13 Meeting		
1	Do members have to pay extra rent to keep chickens at a community garden?	Staff didn’t know.
2	Keep community gardens to growing of produce only. If a community garden wants to keep animals, the animals should be kept as a separate use in a separate fenced-off area with a specific person/group responsible for the care of the animals. The keeping of the animals would be governed by the Keeping of Small Farm Animal standards. (Ruth Beeker).	The task force discussed this idea. Staff asked whether the animals would be allowed in an adjoining, fenced area to the community garden.
3	Once a community garden allows animals, it becomes a small urban farm and should be treated as such (Colette Altaffer).	The proposed urban farm use is a more intensive commercial operation; whereas, the proposed community garden use is for nonprofit purposes whereby the sales of produce is incidental and infrequent.
4	How are community gardens on school grounds regulated? Many “community gardens” on school grounds have animals as part of the learning experience (Merrill Eisenberg).	
5	Clarify that a community garden is not an urban farm (Ruth Beeker).	Staff will prepare a draft proposal for review by the task force at the meeting in December that includes the distinction between a community garden and urban farm.

Revised Proposal [11/27/13; proposed new text to be included as part of Sec. 4.9.2.C.1 (Community Garden Use Specific Standards) and 6.6.5.A (Community Garden Accessory Use Standards)]:

[Notes: 1)The following is staff's attempt at a compromise position that takes into consideration the comments and issues raised at the task force meetings; and, 2) The following applies to a community garden when an accessory or principal use.]

The keeping of small farm animals is permitted in accordance with Section 6.6.5.F, Keeping of Small Farm Animals, and the following:

1. The keeping of small farm animals is accessory to the growing and harvesting of agricultural products;
2. Permission from the property owner to keep small farm animals;
3. The small farm animals shall be kept in a separate, fenced-off area from where the growing of agricultural products occurs;
4. Animals must be tended to at least two times per day; and,
5. A sign must be posted identifying the person responsible for caring for the animals and his or her contact information.

COMPOSTING (REVISED FROM 10/23)

1. Should a setback be required? If so, what should the setback be?

Proposal: The latest draft requires compost areas to be setback in compliance with the Unified Development Code's accessory use provisions (i.e. min. of 6' in residential zones)

Comments from the 10/23 Task Force Meeting: No objection was raised by the proposal as written. The proposal will remain as is.

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FARMERS’ MARKETS (REVISED FROM 11/13)

1. Should Large Farmers’ Markets in residential areas be processed per the PDSO Director Special Exception Procedure or Zoning Examiner Special Exception Procedure?

Comments from the Task Force Meeting and Staff’s Response:

Number	Comments/Issues	Response/Suggested Revision
From the 10/9 Meeting		
1	When considering the type of uses and activities that should be permitted as accessory uses, it’s important to keep in mind that the proposed uses – gardens, community gardens, and urban farms – are tailored from most- to least-restrictive.	1. In residential zones, revise as follows: A) when access is taken from an arterial or collector street identified in the Major Streets and Routes Plan, the Planning and Development Services Department Director Special Exception Procedure is required; and, B) when access is taken from a local street, the Zoning Examiner Special Exception Procedure is required. 2. Remove the distinction between a small and large farmers’ market. 3. Require compliance with the Sign Code. <i>(See draft changes to Sec. 6.6.5.C below for details)</i>
From the 10/23 Meeting		
1	Revise Sec. 6.6.5.C.2 to limit the hours to 7 a.m. to 5 p.m. (reduced from 8 p.m.) to be consistent with the hours of operation for sales at community gardens.	The draft will be revised as suggested.
2	Annual renewal of farmers’ markets should be required, particularly when they are located in the middle of neighborhoods.	The draft will be revised as suggested.
3	Why are farmers’ markets being regulated to the extent proposed? A comparison of the current and proposed regulations is needed for the task force to make informed decisions.	See the “Urban Agriculture: Comparison of the Current and Proposed Regulations” document
From the 11/13 Meeting		
1	Identify the type of accessory uses are permitted at a church and whether they are required to comply with the zoning code (Colette Altaffer).	Staff will report back to the task force at the December meeting.
2	Make a distinction between farmers’ markets that are operated by a for-profit	Under consideration.

Number	Comments/Issues	Response/Suggested Revision
	business and those run by a community group or non-profit organization (Colette Altaffer).	

Revised Proposal (11/27/13)

[Notes: 1) The following is staff's attempt at a compromise position that takes into consideration the comments and issues raised at the task force meetings; 2) The following applies to a farmers' markets when an accessory use; and, 3) See below the revised proposal for a summary of the PDS and Zoning Examiner Special Exception Procedures.]

From Section 6.6.5.C:

C. Farmers' Markets

1. Permitted Zones. Farmers' Markets are permitted as an accessory use as follows:

a. In the RH, SR, SH, RX-1, RX-2, R-1, R-2, R-3, MH-1, and MH-2 zones, Farmers' Markets are permitted as follows:

- (i) As an accessory to a permitted principal use in the Agricultural, Civic, Recreation Land Use Groups only; and,
- (ii) Subject to Sections 6.6.5.C.2.a – i, .3, and .4; and,
- (iii) When access is from a collector or arterial street identified in the Major Street and Routes Plan, the application shall be processed in accordance with Section 3.4.2, PDS Director Special Exception Procedure; or,
- (iv) When access is taken from a local street, the application shall be processed in accordance with Section 3.4.3, the Zoning Examiner Special Exception Procedure;
- (v) A permit to operate a farmers' market is valid for one year. Renewal of a permit is considered in accordance with Section 3.3.3, PDS Director Approval Procedure. The PDS Director may add or modify previously approved conditions or deny the renewal based on complaints filed by surrounding property owners or the neighborhood association.

c. In the IR, O-1, O-2, O-3, P, RV, C-1, C-2, C-3, OCR-1, OCR-2, P-1, I-1, I-2, and MU, Farmers' Markets are permitted in compliance with Section 6.6.5.C.2.c – j, .3, and .4; and,

d. Prohibited in the OS zone.

2. Standards. The following standards are required of Farmers' Markets as specified in Section 6.6.5.C.1:

a. A Farmers' Market cannot be operated more than two days each week.

b. A Farmers' Market in a residential zone shall not be operated more than six hours per day between the hours of 7 a.m. and 5 p.m.

c. Craft- and non-agricultural related product sales must be clearly accessory to the sale of food products. Specifically, at least 20 percent of the farmers' market space does not occupy the same allotted area on an uninterrupted, continuous, daily basis for the purpose of display and sale, exchange, or barter of merchandise.

d. Outdoor lighting shall comply with Section 6-101, Outdoor Lighting Code.

e. All litter, tents, stalls, food, merchandise, signs (on-site and off-site), and other evidence of the Farmers' Market shall be removed from the premises at the end of each market event.

f. Outdoor activity, including the outdoor display of goods for sale, is permitted.

g. Compliance with Section 16-31, Excessive Noise, of the Tucson Code is required. Additionally, loudspeakers and amplified music are prohibited outdoors when within 300 feet of a residential use or zone. Any high noise activity, such as amplified entertainment, shall occur within an enclosed building when within 300 feet of a residential use or zone.

h. The retail area shall be dust proofed.

i. Signs associated with the sale shall comply with Chapter 3 (Sign Code) of the Tucson Code;

j. For Farmers' Markets within 300 feet of a residential use or zone, the applicant must address how the proposal will mitigate any potential nuisances on the nearby residential neighborhood. The applicant shall provide the following information:

i. Frequency that the Farmers' Market will occur and the hours of operation;

- ii. Methods to avoid potential increases in noise and light intrusion;
 - iii. Methods to deter vehicular access into adjacent residential neighborhoods using signage or other means;
 - iv. Methods to prevent drive-through traffic or habitual parking within adjacent residential neighborhoods or commercial development;
 - v. When the applicant proposes to use a principal use's required parking, either partially or completely, identify where alternative parking for customers and vendors will be located.
3. When an accessory use, Farmers' Markets are not required to provided additional motor vehicle or bicycle parking, off-street loading, or landscaping and screening beyond what is required for the principal use.
4. Additional Conditions Permitted. The Director or Zoning Examiner, whichever is applicable, may require conditions of approval as necessary to protect the health, safety, or welfare of any property impacted by the farmers' market.

Summary of Procedures:

	PDS-SE Procedure	ZE-SE Procedure
Required?...		
Neighborhood Meeting	No	Yes
Notice	Yes. Property owners w/in 50' and neighborhood association	Yes. Property owners w/in 300' and neighborhood associations w/in 1 mile
Public Hearing	No	Yes
Decision Maker	PDS-SE Director	Zoning Examiner
Appeals	Board of Adjustment	Mayor and Council

GARDENS

1. Should gardens in the front yard be required to provide fencing or other measures to deter javelina, rabbits, and other predators? (REVISED)

Proposal: Current code and the proposal do not require fencing or other measures.

Note: The suggested revision could have the unintended consequence of requiring fencing around prickly pear and other types of cacti routinely seen in front yards because they are eaten by javelina.

Comments from the 10/23 Task Force Meeting: Concern was expressed that steps should be taken from inadvertently attracting predators to residential lots.

Suggested Revisions: None. There was not a majority opinion to require fencing of gardens in the front yard.

2. Should the leasing of yards for farming purposes be prohibited? (will be discussed at the 12/11 meeting)

Proposal: The proposal is silent on this issue. The Home Occupation standards would be triggered if this were to happen.

Issue: The proposal does not address the possibility of someone leasing homeowners' yards for farming purposes and the effects this could have on a neighborhood if numerous adjacent properties participate in this. This is of particular concern in neighborhoods where there are a lot of rental properties. Landlords may be willing to lease out their yards to generate additional income, particularly if they are not able to rent their dwellings.

KEEPING OF SMALL FARM ANIMALS

NOTES:

1. See “Proposed Keeping of Small Farm Animals Regulations” (Dec. 5, 2013) attachment for the latest complete draft of the keeping of small farm animal regulations.
2. From Ruth Beeker (12/5/13) – *“On a different note, but one not easier to resolve: I do not see being able to get a compromise on the farm animal topic in a short period of time. Not only is there the number of animals, there is a major concern that we are setting up a situation which is legal but has the potential to cause problems which could destroy quality of life in the immediate area with no enforceable remedy. I think we need lots more public input than that from the 4 of us on this committee in order to come up with the animal portion of any proposed new ordinance. Having been a person who participated in something much less controversial, the recent changes in the NPO regulation yard sales which finally did get passed, and the size of work vehicles allowed in neighborhoods which M/C has sent back to the drawing boards for the third time, it seems unproductive to move forward with something that does not have support from our total committee. **I propose that our committee separate the plant production topics out to be one proposal which can be sent to PC with committee support with a little more work on the final details** [emphasis added]. That I personally see as something that I could support. Then the advocates for small farm animal food production can work with the larger community to see what feedback they get and what support they can engender. Right now I am not willing to support any small farm animal ordinance without much more community input.”*

1. Should the keeping of small farm animals be permitted on residential lots?

Proposal: The proposal conditionally allows the keeping of small farm animals, such as chickens, miniature goats, and rabbits, on residential lots.

Issue: Small farm animals will attract predators (e.g. coyotes, bobcats, javelina) to residential neighborhoods.

Task Force Recommendation: Yes, the keeping of small farm animals should be permitted in accordance with yet-to-be finalized conditions.

2. What can be done to ensure that the number and frequency of predators in a residential area will not increase with keeping of small farm animals? [WILL BE DISCUSSED AT THE 12/11 MEETING]

Possible Revisions: Revise the proposed shelter standards to incorporate the Arizona Game and Fish Department’s guidelines on discouraging predators, including, but not limited to, requiring shelters to have sturdy roofs and keeping food and water inaccessible to any animal outside the shelter.

3. What is the appropriate number of animals that should be permitted? [WILL BE DISCUSSED AT THE 12/11 MEETING]

Proposal: Currently, the Tucson Code allows 24 heads of poultry. The Tucson Code or Unified Development Code does not specify limits on the other animals included in the draft proposal.

The proposal is based on an animal unit (AU) system whereby each permitted animal is assigned a point value, which is based on the “impact” of each animal (i.e. size, waste generation, etc.). The maximum permitted number of animal units is 0.2 AU/1,000 square feet of lot size. Additional caps on the number permitted are in effect on larger lots. Any mix of permitted animals is allowed provided the maximum permitted number is not exceeded.

Issue: The following is a sample of the issues and concerns that have been raised. See the “Proposed Urban Agriculture Amendments: Compilation of Issues, Comments, and Questions” document for a more complete listing.

- The formula used to calculate the number of animals permitted is overly complicated and difficult to enforce.
- Only including animals of laying or breeding age will be difficult to administer and enforce.
- The miniature goat standards are problematic and confusing considering dairy goats only give milk after giving birth, but the proposal prohibits bucks (males) of breeding age.
- But how does that turnover of generations of animals ever get accounted for in a static formula?

Comments from the Task Force Meeting and Staff’s Response:

Number	Comments/Issues	Response/Suggested Revision
From the 11/13 Meeting		
1	The number of animals permitted should be based on the amount of open space available on a property, not the lot size (Ruth Beeker).	This will be discussed at the December 11 th task force meeting.
2	Merrill Eisenberg explained the rationale behind the proposed Animal Unit approach, which is to allow a more nuanced approach that takes the type of animal and the varying size of lots into consideration as variables when determining the maximum number of animals permitted. Many of the other cities that allow the keeping of small farm animals place a fixed cap on the number,	

	<p>regardless of lot size or type of animal. While this is a simpler approach, it does not make a distinction between larger lots where it would be acceptable to allow more animals and smaller lots where it may not be acceptable. It also does not allow the flexibility to reasonably keep a variety of animals (Note: Merrill is one of key people who drafted the Animal Unit approach).</p>	
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Possible Options:

1. Animal unit approach (current proposal with or without revisions);
 2. “X” number of animals per square footage of lot area [variation on the Animal Unit approach; for example, Cleveland (1 animal per 800 sf of lot area)];
 3. “X” number of animals per square footage of open space on a lot; or,
 4. Straight number (for example, current City allows a maximum of 24 chickens regardless of lot size).
- 4. What are the appropriate setback requirements for small farm animal shelters? Should reductions in the setback requirement be permitted when written consent from a next door neighbor(s) is obtained?**

Issue: The keeping of small farm animals, if not done responsibly, can create nuisances for surrounding property owners.

Comments from the Task Force Meeting and Staff’s Response:

Number	Comments/Issues	Response/Suggested Revision
From the 11/13 Meeting		
1	<p>The proposed 20’ setback from adjacent residences should be expanded to include guest houses and patios (i.e. outdoor “living” spaces) (Ruth Beeker and Colette Altaffer).</p>	<p><i>Response:</i> The task force discussed the inclusion of patios and outdoor living spaces. There was concern that to require setback from outdoor living spaces is too ambiguous and could include so many features, such as gazebos, outdoor fire pits, and pools, as to severely limit the ability to keep of small farm animals. One suggestion was to require a 20’ setback from any “habitable space” as defined in the Building Code.</p>
2	<p>Do not allow setbacks to be reduced via sign-off from an adjacent property owner (Ruth Beeker and Colette Altaffer).</p>	<p>This will be discussed at the December 11th task force meeting.</p>

Revised Proposal (11/27/13)

[Notes: 1) The following is staff's attempt at a compromise position that takes into consideration the comments and issues raised at the task force meetings; and, 2) The following applies to the keeping of small farm animals at residences, community gardens, and urban farms.]

From proposed Sec. 6.6.5.F.6:

6. Location Requirements

- a. Animal shelters may have a zero side or rear perimeter yard when the shelter is:
 - i. Six (6) feet or less in height;
 - ii. Sixteen (16) square feet or less, excluding unenclosed pens, in area;
 - iii. Twenty (20) feet or more from any habitable space on adjacent properties as measured from the nearest point of the enclosed shelter to the nearest point of the affected habitable space. This requirement shall be verified and enforced through the issuance of a permit by the city; and,
 - iv. Screened by a six foot tall fully opaque nonvegetative screen such as a fence or wall.
- b. Animal shelters that exceed the dimensional limits in Section 6.6.5.F.6.a.i & .ii shall be at least 20 feet from any habitable space on adjacent properties as measured from the nearest point of the enclosed shelter to the nearest point of habitable space and comply with the perimeter yard requirements in accordance with Section 6.6, Accessory Uses, Buildings and Structures. This requirement shall be verified and enforced through the issuance of a permit by the city.

From Sec. 11.4.9 Definitions - H

Habitable space

A space in a building for living, sleeping, eating or cooking. Bathrooms, toilet rooms, closets, halls, storage or utility spaces and similar areas are not considered habitable spaces. (Source: 2012 International Building Code)

Issue Yet to be Resolved: Whether to allow the setback requirement to be reduced or waived with written consent from the owner of the affected residential dwelling. This is currently permitted with certain types of accessory buildings.

5. Should small farm animals be permitted in the front yard of residences?

Issue: Allowing small farm animals and their shelters in the front yard will detract from the character of the neighborhood.

Comments from the Task Force Meeting and Staff's Response:

Number	Comments/Issues	Response/Suggested Revision
From the 11/13 Meeting		
1	The keeping of animals should be prohibited in the front yard (Ruth Beeker).	The task force agreed that animals should be kept in the side and rear yards only in compliance with yet-to-be finalized setback requirements. Future drafts will prohibit the keeping of small farm animals in the front yard.

Revised Proposal (11/27/13; excerpt from proposed Sec. 6.6.5.F.6.b):

[8. Animal shelters are permitted in the side and rear yard only.](#)

SALES OF PRODUCTS GROWN ON-SITE (WILL BE DISCUSSED AT THE 11/13 MEETING)

1. Should the sale of products grown on-site be permitted from a residence?

Proposal: The proposal caps the sale of products grown on-site to a maximum of 4 advertised events per year, which is consistent with the proposed yard sale regulations. Yard sales are currently permitted. The sale of produce and eggs is not significantly different than yard sales from an activity perspective.

The unadvertised sale of products, such as “over the fence”, neighbor-to neighbor type sales, may occur without restriction.

Comments from the 10/23 Task Force Meeting and Staff’s Response:

See pages 2 & 3 for comments and staff’s response to the issue of allowing sales as an accessory use to community gardens, urban farms, and residences.

Suggested Revisions to the September Draft: See page 3 for preliminary revisions to the draft.

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URBAN FARM (WILL BE DISCUSSED AT THE 12/11 MEETING)

- 1. Clarify what an “urban farm” is considering the wide spectrum of areas (from residential to industrial), size, and scale of operations that can be permitted under the proposal?**
- 2. Should urban farms be permitted in residential areas? Can potential nuisances be mitigated through standards, minimum lot size, and/or review and approval procedure?**
- 3. Should the keeping of small farm animals be permitted on an urban farm?**

Proposal: The September draft allows the keeping of small farm animals as an accessory use to an urban farm.

Issue: It is possible that any animals kept on an urban farm will not be properly cared for since there is not constant supervision or someone readily available to respond should something happen.

Possible Solutions:

1. Do not allow animals at an urban farm; or,
2. Require that animals be tended to at least two times per day; or,
3. Require a video monitoring system that can be accessed online; or,
4. Other?