

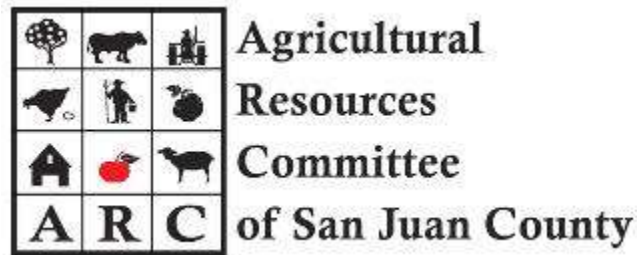
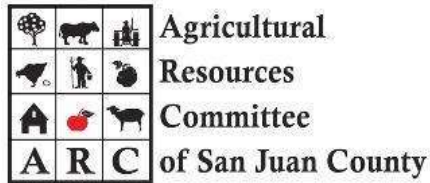
## Adam Zack

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**From:** Faith Van De Putte  
**Sent:** Wednesday, May 19, 2021 4:06 PM  
**To:** Christine Minney; Jaimes@sanjuanco.com  
**Cc:** Cindy Wolf; Mike Thomas; Comp Plan Update  
**Subject:** Memo on Criteria for Agriculture Resource Land designation  
**Attachments:** Criteria for ARL Memo.docx

Council Members,  
Please, find attached the ARC's comments and recommendations on Agricultural Resource Land designation.  
Thank you for your work on preserving farmland in San Juan County.  
Faith Van De Putte

Faith Van De Putte  
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## Memorandum

To: Christine Minney, County Council  
Jamie Stephens, County Council  
Cindy Wolf, County Council

CC: Mike Thomas, County Manager  
Planning Commission

From: San Juan County Agricultural Resource Committee (ARC)

Date: May 19, 2021

Subject: Criteria for Agricultural Resource Land Designation

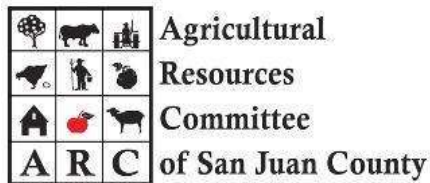
### Background & Vision

The Agricultural Resource Committee (ARC) would like to recognize the hard work that the Department of Community Development (DCD) has put into the methodology for Agricultural Resource Land (ARL) designation. The ARC is submitting comments on the proposed methodology.

As the first step in the Comprehensive Plan update, the San Juan County Council adopted a Vision Statement on June 12, 2018. This included a new section on agriculture:

*“The San Juan Islands have a rich agricultural heritage that remains culturally and economically significant. We invest resources to ensure that agricultural lands are preserved and to maintain and enhance agricultural viability. We recognise the integral role that agriculture plays in the stewardship of our soils and water resources. Diverse agricultural activities are essential to the health and wellbeing of our community, contributing to the social, economic and environmental fabric of our islands.”*

### Recommendations: Goals and Guidelines



In pursuing the vision stated above the ARC would like to highlight WAC 356-190-050(4) that adds the following additional goal for identifying Agricultural Resource Land (ARL) of “long term commercial significance”:

*“the process should result in designating an amount of agricultural resource lands sufficient to maintain and enhance the economic viability of the agricultural industry in the county over the long term.”*

We would like to pose the following questions for consideration:

How does the methodology proposed by DCD *preserve agricultural lands* if only 15% of parcels, or those that score 38 or higher, are considered parcels of long-term commercial significance?

What is the amount of agricultural land needed to support our current and future agricultural industry?

How does the current methodology *enhance agricultural viability* if a parcel must score highly on a large number of diverse criteria in order to be designated?

Why does the DCD proposal require a parcel to score highly on all criteria when the regulation says any of the 11 criteria should be applied only “as applicable”?

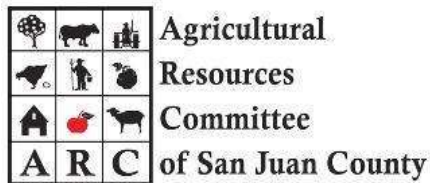
The scoring system is complicated and it is difficult to predict how changing the weighting will affect outcomes on a parcel by parcel basis. We recommend either reducing the score that deems a parcel to have long term commercial significance from 38 to 34, and/or to change the criteria and weights as outlined below.

### **Recommendations: long-term commercial significance methodology matrices**

The WAC outlines 11 “*nonexclusive*” criteria that counties may use “*as applicable*” to determine the long-term significance of land for agriculture. Has the DCD considered including additional important criteria relating to climate change and/or eliminating criteria that do not apply to our situation? The ARC has reviewed the methodology proposed by the DCD and recommends adjusting the weighting to better reflect the unique situation of agriculture in San Juan County and to ensure that enough ARL is designated to meet projected future needs.

**Criterion 1:** The classification of prime and unique farmland soils as mapped by the NRCS (WAC 365-190-050(3)(c)(i))

**Recommendation:** Increase weight from X2 to X4 to recognize that we must preserve soils as these are the most fundamental component of agriculture. This is the most important criteria and should be weighted as such.



**Criterion 2:** The availability of public facilities, including roads used in transporting agricultural (WAC 365-190-050(3)(c)(ii))

**Recommendation:** Eliminate or Decrease weight from X1 to X0.25. The county is so small that this is negligible. As an example, Waldron Island produces an exceptional amount of food for the county without ferry service.

**Criterion 3:** Tax status, including whether lands are enrolled under the current use tax assessment (WAC 365-190-050(3)(c)(iii))

**Recommendation:** No Change in weighting. Modify to include lands held in public trust, such as SJC Land Bank Parcels which are not taxed so unable to enrol in current use..

**Criterion 4:** The availability of public services (WAC 365-190-050(3)(c)(iv))

**Recommendation:** Decrease weight from X1 to X0.25. Or eliminate this criteria, as it's not really applicable to our island context and skews scoring.

**Criterion 5:** Relationship or proximity to urban growth areas (WAC 365-190-050(3)(c)(v))

**Recommendation:** Decrease weight from X1 to X0.25. Or eliminate this criteria, as it is also not applicable to our island context.

**Criterion 6:** Predominant parcel size (WAC 365-190-050(3)(c)(vi))

**Recommendation:** Decrease weight from X2 to X1. Despite our best efforts to protect large farms, every year the average farm size decreases. Smaller farms serve a vital role especially in vegetable production although ranches continue to rely on larger acreage, much of which is leased.

**Criterion 7:** Land use settlement patterns and their compatibility with agricultural practices (WAC 365-190-050(3)(c)(vii))

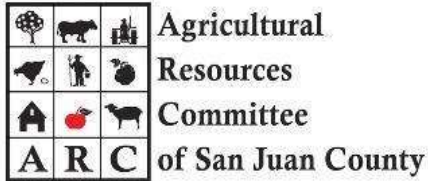
**Recommendation:** Eliminate or Decrease weight from X1.25 to X1. Adjacent development should not negatively impact the designation, given the low impact agriculture practices that predominate in our county (i.e. we don't have huge feedlots or spray chemicals from crop dusters). See additional discussion below in regards to WAC 365-190-040(12)

**Criterion 8:** Intensity of nearby land uses (WAC 365-190-050(3)(c)(viii))

**Recommendation:** Eliminate, decrease, or amend the metric to include all Land Bank properties and those parcels with conservation easements. Currently, a parcel with an adjacent SJC Land Bank parcel would score low on this criteria, as Land Bank properties are not eligible for AG or open space Assessor's use code. Thus, this criteria would produce lower than deserved scores for a very large number of parcels.

**Criterion 9:** Proximity to markets (WAC 365-190-050(3)(c)(xi))

**Recommendation:** Eliminate or decrease weight from X1 to X0.25. As with Criterion 2, Waldron Island produces an exceptional amount of food for the county without proximity.



In regards to Criterion 7 and 8, as currently proposed these have the potential to set up a feedback loop in which parcels near or abutting Resource Lands are subdivided, which will impact the scoring of the resource land and in so doing create the potential for de-designation. We would like to point out WAC 365-190-040(12) that states:

*“Any uses adjacent to agricultural, forest, and mineral resource lands of long-term commercial significance must not interfere with their continued use for the production of agricultural, forest, or mineral products respectively. Counties and cities should consider the adoption of right-to-farm provisions, and may also adopt measures to conserve and enhance marine aquaculture. Covenants or easements recognizing that farming, forestry, and mining activities will occur should be imposed on new development in or adjacent to agricultural, forest, or mineral resource lands.”*

In the shared spirit of preservation of our agricultural lands, we hope that our recommendations are helpful.

Thank you for your consideration.

On Behalf of the Agricultural Resource Committee,

Meike Meissner, ARC Chair

Faith Van De Putte, ARC Coordinator