

Memorandum

To: Erika Shook, AICP, Director, DCD

CC: SJC Planning Commission
Adam Zack, Planner II, DCD
Linda Kuller, Planning Manager, DCD
Mike Thomas, County Manager
Bill Watson, County Council

From: San Juan County Agricultural Resource Committee (ARC)

Date: October 13, 2018

Subject: ARC Comments on Comp Plan Update Economic Analysis of Resource Lands

Purpose

To provide the Department of Community Development, Planning Commission and County Council with the ARC's comments and recommendations on the Agricultural component of the *SJC Comp Plan Update Economic Analysis of Resource Lands (EARL)*.

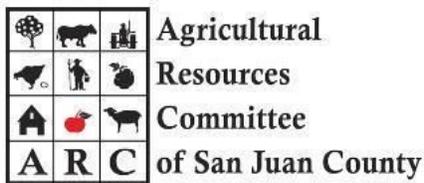
Background

The Agricultural Resource Committee is a Citizen Advisory Committee tasked with advising the County Council on issues affecting the Agricultural environment. The ARC is comprised of 15 voting seats, at least 50% of which must be farmers. ARC members act as listening posts throughout the islands and the ARC conducts formal and informal outreach throughout the year that informs the ARC's work.

The attached comments are the result of work done by the ARC Policy Subcommittee as well as discussions that occurred at ARC meetings on April 19 and May 22, 2018, and at the San Juan County Agricultural Organizations Retreat on May 15, 2018. **Further work was done during the summer and this Memo was adopted by the ARC on September 18th.**

Attachments

The ARC's comments are attached. Comments are in regards to the report [San Juan County Comprehensive Plan Update Economic Analysis of Resource Lands](#).



San Juan County Comprehensive Plan Update

Comments on the *Economic Analysis of Resource Lands (EARL)*

Takeaways

The ARC appreciates the thought that went into the EARL report, the care taken to solicit shareholder input, and the conclusions drawn. Some of the main takeaways from the report from the ARC's perspective are:

- Preserving agricultural land is a “high” priority for residents of San Juan County;
- The number of people employed in the agricultural sector in San Juan County is increasing;
- While agriculture's direct contribution to the local economy appears limited when looking at direct agricultural sales it contributes to the overall economy through ecosystem services and subsidizes the tourism industry specifically through the maintenance of open space, rural character and sale of island grown food;
- Those economic contributions of island grown food have not been measured, but should be considered while making policy decisions;
- Criteria for designation of Agricultural Resource Land (ARL) are at odds with trends of smaller farms within the county.

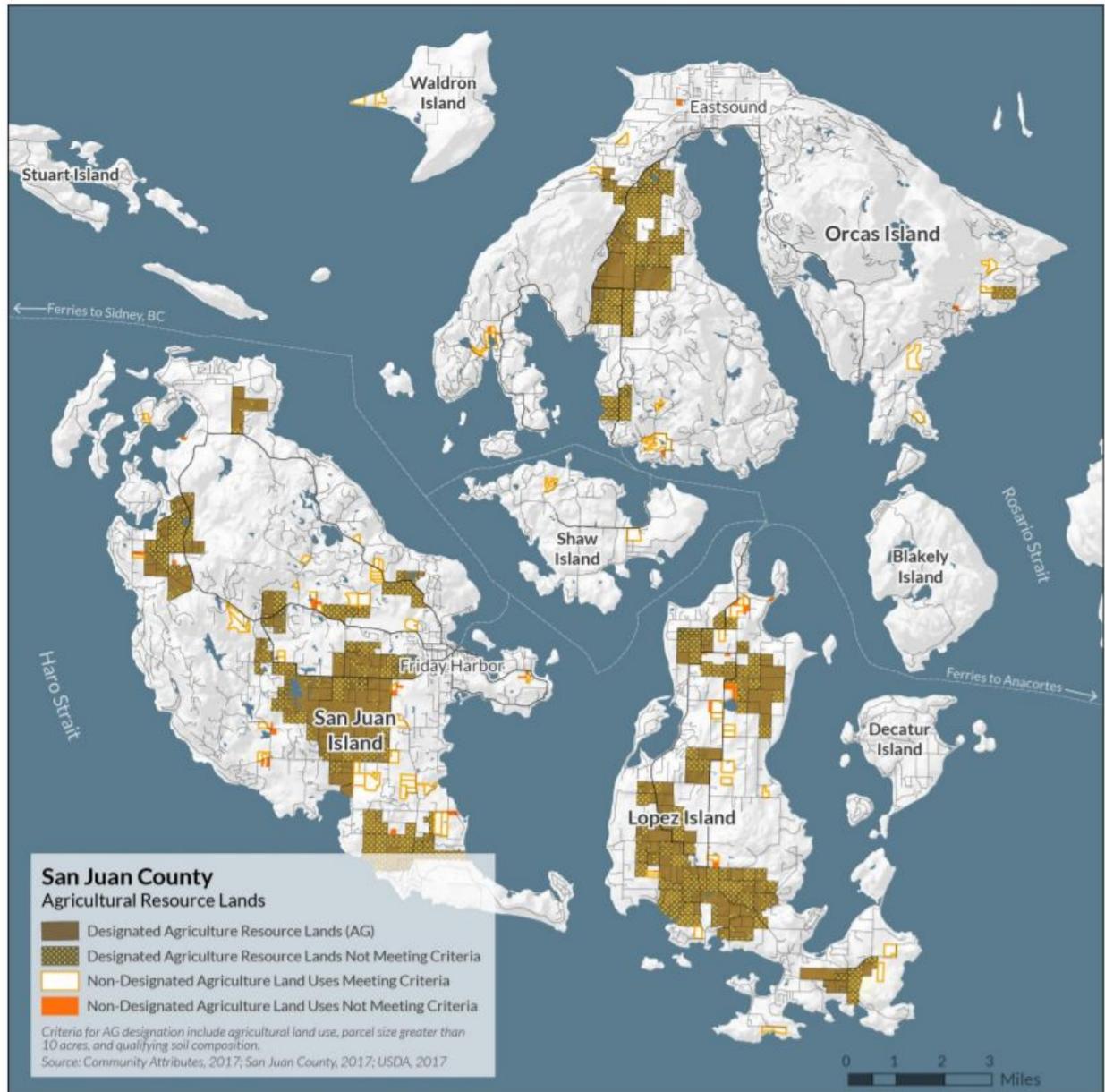
Exhibits 19 and 20, Agriculture Lands and Designation Status, San Juan County, 2017

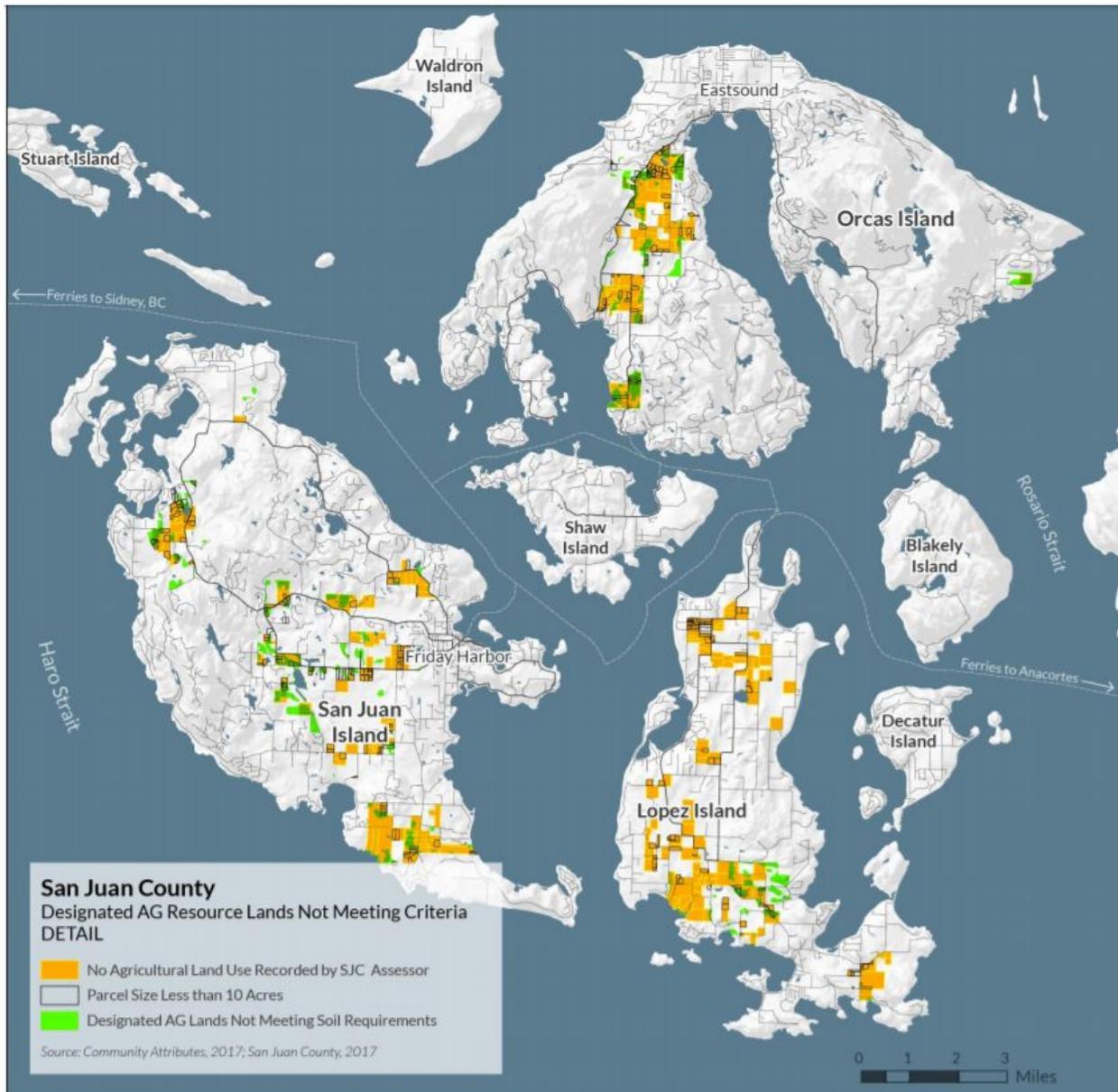
While the ARC agrees with much of the information provided in the report, the ARC would also like to share some concerns with Exhibits 19 and 20 (pages 28 and 29 of the report). These are included on the following pages for easy reference.

Designated Agricultural Resource Lands Not Meeting Criteria

The data shown in the report regarding the amount of land that is “designated agricultural resource lands not meeting criteria” (Exhibit 19, page 28) is misleading. Earlier in the report it is noted that “agricultural lands may be designated as “Agricultural Resource Lands” if they are at least ten acres in size, and feature soils that support long term commercial agricultural production, or are under a conservation easement for agricultural use or are enrolled in the Open Space Agriculture taxation program” (emphasis added). According to County Policies that define criteria for ARL designation (San Juan County Comprehensive Plan Section B, Element 2 Policies (2.3.D.1–5), land does not have to be entirely prime agricultural soils, and the Open Space taxation program is just one avenue toward designation.

Exhibits 19 and 20. Agriculture Lands and Designation Status, San Juan County, 2017





Source: San Juan County Assessor's Office, 2017; Community Attributes Inc., 2017

How Exhibit 19, 20 and 21 are misleading:

1. The map that is Exhibit 20 on page 29 and corresponding Exhibit 21 on page 30 lists 6,996.9 acres as having no agriculture land use recorded by the Assessor. This is offered as a reason for not meeting the criteria for designation. The present use of the land is not a necessary condition for designation. Designation can be based on size and soils alone, but not on present use by itself. (WAC 365-190-050(3)(b)(i))

2. The “Designated Ag Lands Not Meeting Soil Requirements” in Exhibit 20 on page 29 have several inconsistencies.

While soil qualities from the NRCS are the basis for this factor, the soil survey is based on broad trends, since it is cost-prohibitive to sample every tenth of an acre and soil values can vary within a short distance. Attempts to use the soil mapping program to look at anything less than about 300 acres, brings up the following message :

Warning: Soil Map may not be valid at this scale.

You have zoomed in beyond the scale at which the soil map for this area is intended to be used. Mapping of soils is done at a particular scale. The soil surveys that comprise your AOI were mapped at 1:12,000. The design of map units and the level of detail shown in the resulting soil map are dependent on that map scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Claiming accuracy to one-tenth of an acre appears inconsistent with the data available.

3. The acres listed with a non-qualifying soil profile in Exhibit 20 are not parcels. Those acres are simply portions of parcels. The acreage of the parcel may still feature soils that support long term commercial agricultural production, and thus fit the criteria for inclusion in ARL. Using those numbers to remove those portions from ARL parcels would require split designations for almost every parcel within the designation. Even the Open Space taxation program allows for 20% of agricultural parcels to be in ‘incidental use’. Soils that are non-qualifying may still retain use in agriculture, as called out in WAC 365-190-050(b). For example rocky soils are perfect for overwintering livestock, siting farm infrastructure, and housing. Removing those acres from agricultural use could result in abuse or development of prime soils. The acreage listed as Potentially Not Meeting Criteria promotes the conception that over half our ARL should not be designated. The ARC feels strongly that this is false and misleading.

ARC Recommendations Concerning the EARL Report and Next Steps to be Taken:

The ARC has analysed both the Economic Analysis of Resource Land report and the language in the current Comprehensive Plan and has the following recommendations:

1. The Goals and Policy recommendations on pages 30-33 of the EARL report are aligned with ARC recommendations and should be considered as written.
2. Refrain from de-designating parcels that are presently in ARL based on data presented in Exhibits 19 and 20 of the EARL report.
3. Conduct a thorough parcel by parcel review in coordination with the ARC before considering any redesignation of parcels to or from ARL.

4. Consider increasing the total acreage of ARL in relation to the anticipated future growth in agriculture outlined in the EARL report (Exhibit 15. Forecast of Agriculture Employment, San Juan County, 2015-2030).
 - As stated on page 27 of the Resource Land report “The fact that there are currently non-designated lands in current use for agricultural production in San Juan County suggests that there is greater demand for agricultural land than there are designated agricultural resource lands. Increasing employment in agriculture, per the ESD forecast, would also potentially create demand for additional agricultural land, whether designated as resource land or not.”
 - As stated in WAC 365-190-050 (5) counties shall designate *“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; and to retain supporting agricultural businesses, such as processors, farm suppliers, and equipment maintenance and repair facilities.”*
5. The current language seems to suggest that 100% of a parcel needs to be one of the 34 soil types identified as suitable for farming in order to be designated ARL. As noted in WAC 365-196-310 b, “Some agricultural operations are less dependent on soil quality than others, including some livestock production operations.” Some farms in San Juan County utilize land outside of these specific soil types as important parts of their farming operations. Consider reviewing the soil criteria, and what portion of land should be a specific soil type to be considered ARL. This change should be made in [Section 2, Element B, Land Use, pg. 21](#).
6. Overlay the Economic Analysis of Resource Lands maps with the Voluntary Stewardship Program Maps (VSP Maps) to further identify and include parcels as undesignated agricultural land. Exhibit 2 page 14 shows “Undesignated Agricultural Lands”. From our reading it appears that the report used enrollment in the current use taxation program to define Agricultural Lands. The VSP maps were created after a parcel by parcel survey of land with agricultural activity as defined by RCW [90.58.065](#). The VSP maps will give us a more accurate picture of how much land is actually being farmed, regardless of land use designation and enrolment in CUFA. The ARC worked with Daniel Root, GIS Program Coordinator of San Juan County, to overlay parcels with agricultural activity (identified in green) as identified by the VSP, with lands enrolled in CUFA and in ARL. Follow these links to the maps: [Farms and Land Use-Lopez](#), [Farms and Land Use-Orcas](#), [Farms and Land Use- San Juan](#).
7. Prioritize retaining and/or creating large areas of contiguous Agricultural Resource Land in the event of any redesignation, as it reduces conflict with other uses and retains rural character of the landscape.
8. Update and rewrite the Agricultural Resource Lands criteria ([Section 2, Element B, Land Use, pg. 21](#)) in a way that clearly establishes the criteria for ARL designation. As currently written, and demonstrated in the screenshot below, the reference to “criteria in a. above” in 5.a.(1)ii. is particularly confusing and problematic.



**Agricultural
Resources
Committee
of San Juan County**

a. Agricultural Resource Lands

Goal: To ensure the conservation of agricultural resource lands of long-term commercial significance for existing and future generations, and protect these lands from interference by adjacent uses which may affect the continued use of these lands for production of food and agricultural products.

Policies:

- (1) Lands in agricultural use which are characterized by the following criteria may be designated as Agricultural Resource Lands:
 - i. Areas in parcels of ten acres or larger with soils capable of supporting long term commercial agricultural production. The federal Natural Resources Conservation Service (NRCS) identified 34 soil types suitable for farming in San Juan County. These soils can be found on page 121 of the 2009 Soil Survey of San Juan County, Washington, available at: http://soils.usda.gov/survey/online_surveys/washington/#san2009; or
 - ii. Lands which meet the criteria in a. above which are under conservation easement for agricultural use or which are enrolled in the Open Space-Agriculture taxation program.

9. Promote more intensive development of ag-related facilities on resource land, provided these facilities are located in such a way as to minimize their impact on prime agricultural soils.
10. Look for ways to expand the criteria for ARL designation to include the following:
 - a. food security issues, which may include providing local food supplies for food banks, schools and institutions, vocational training opportunities in agricultural operations, and preserving heritage or artisanal foods. WAC 365-190-050 (4)
 - b. 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; and to retain supporting agricultural businesses, such as processors, farm suppliers, and equipment maintenance and repair facilities. WAC 365-190-050 (5)

Thank you for your consideration,

On Behalf of the Agricultural Resource Committee



Learner Limbach, ARC Chair

Faith Van De Putte, ARC Coordinator