

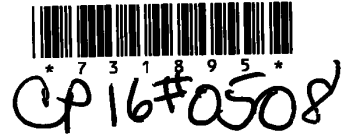
I'd want to know how much Ag-LTCS lands are currently designated, to better understand the impact of losing 7,157 acres of designated lands

I'd also see if there are any efforts or thoughts about reducing the existing parcelization by requiring lot consolidation, especially when held in common ownership. Many counties require that already for their resource lands and some for their rural lands

Maintaining current use taxation and incentives is good, but in some cases, smaller lots do not qualify for such options

As you may have noticed, the state is more concerned about conversion, incompatibility, internal consistency (within the comp plan) and fragmentation issues more than parcel size

I have provided (below) links to some of our guidebooks that might be helpful



Our Publication List

<http://www.commerce.wa.gov/Services/localgovernment/GrowthManagement/Pages/GMSPublications.aspx>

Procedural Criteria

<http://app.leg.wa.gov/WAC/default.aspx?cite=365-196>

Ag Lands Study

<http://www.commerce.wa.gov/Documents/GMS-Ag-Lands-Report-2004.pdf>

Transfer of Dev Rights

<http://www.commerce.wa.gov/Services/localgovernment/GrowthManagement/Regional-TDR-Rights-Program/Pages/default.aspx>

Please let me know if you have questions

Ike

-----Original Message-----

From: Silliman, Peter [mailto:Peter.Silliman@clark.wa.gov]

Sent: Wednesday, January 28, 2015 1:19 PM

To: Nwankwo, Ike (COM)

Subject: Agricultural designation

Ike,

I am new to a supporting role in the Clark County Council office. I talk regularly with Carol Levanen and Susan Rasmussen who say they have also talked to you. They speak highly of you.

Clark County is planning for their 2016 Comp plan update. I want to make sure they consider some alternatives that they have not at this point.

O'Donnell, Mary Beth

From Orjiako, Oliver
Sent Tuesday, February 03, 2015 4:46 PM
To Euler, Gordon, Alvarez, Jose, O'Donnell, Mary Beth
Cc Cook, Christine
Subject FW: Agricultural designation

FYI

-----Original Message-----

From Nwankwo, Ike (COM) [mailto:ike.nwankwo@commerce.wa.gov]
Sent Thursday, January 29, 2015 6:12 PM
To Silliman, Peter
Cc susan.rasmussen@sprazz@outlook.com, Carol Levanen (cndental@yahoo.com), Orjiako, Oliver
Subject RE: Agricultural designation

Peter, thanks for contacting our office for assistance with the county's Resource Lands designation update. Some information contained in my response to your question may be general information and should be tailored to fit Clark county's local circumstances. I also would like to note that this does not constitute legal advice as I am not an attorney. Please work with your legal counsel before making any final decisions.

When it comes to Resource Lands designations, the county should use countywide not parcel by parcel approach. You should be looking to have adequate amount of land needed to maintain economic viability of agricultural sector in the county. The GMA does not specify whether AG 5 should be allowed or not. The question you and the county should be trying to answer is what effect would de-designation have on Agricultural Industry as a whole. WAC 365-190-050 discusses this, as you pointed out. You are right - some counties (Snohomish, Chelan, and may be other counties) do allow smaller Ag Parcels. You may want to talk to them to see if they have conducted any study of the effect of such parcelization. Will a change from Ag to Rural designation or a change from AG 10 to Ag 5 trigger conversion to other uses or raise incompatibility issues. How will it affect your comprehensive plan vision (i.e. rural character)? If you and the county address those questions, you may find the answer there - it is a local call determined by local circumstances.

It appears from what you stated below that for lands designated as Agricultural Lands of Long-term Commercial Significance (LTCS), all such lands with current parcel sizes less than 10 acres would lose their AG-LTCS designations.

As there is no indication of where these smaller parcels are located relative to the other larger parcels, the main risk I see is in increasing the fragmentation of the remaining agricultural resource lands, and this in turn making it more difficult to ensure these remaining Ag-LTCS lands are conserved or protected from adjacent rural uses.

While a change to Rural-5 should not increase parcelization by itself (if the parcels are already less than 10 acres), the fragmentation and increased price pressure from surrounding rural development will likely increase the costs of farming from dealing with nuisance complaints from neighbors and risking losing regional agricultural suppliers and service industries.

To understand this better, I'd want to know the spatial distribution of the various sized lots, to see if they are scattered throughout the Ag-LTCS zone, or if they are located in a discrete area or a more peripheral area.

I would appreciate if you would provide feedback on a specific suggestion

That suggestion is for Clark County to de-designate existing parcels under 10 acres that are currently in the G-20 designation. There are a few reasons for this that relate mostly to public perception. This would affect 1,773 parcels and 7,157 acres.

I believe that this may fall under recognizing the existing land use settlement and parcelization talked about in WAC-365-190-050.

Some other counties have a minimum parcel size criteria for resource designations.

Agricultural uses would still be encouraged thru current use taxation and other programs.

The AG designation currently does not appear to preserve the land for AG use any more than they would receive in an R-5 designation.

Changing them to an R-5 designation would not lead to any additional parcelization so I am anticipating a negligible environmental impact.

I'm looking for validation of my analysis and also a confirmation that this would be allowed under the GMA.

Again, this is just a concept that I have developed based on public input and I may suggest it be evaluated further by our planning department.

I am just looking for encouragement or a good answer why it may not be allowed from an expert in the field.

I hope you can assist me,

Thank you,

Peter Silliman
Peter.Silliman@clark.wa.gov
360-397-2232

This e-mail and related attachments and any response may be subject to public disclosure under state law.