Dear Commissioners,

Clark County Citizens United, Inc. believes it is important to recognize what the purpose of rural and resource land is and why they were created. Rural lands are lands that recognize that many people want a few acres to have a home, raise a family, grow a garden of grow an orchard. They work outside the home and do not intend to conduct a resource business. They want to be away from the city life and have space around them. Rural lands are particularly designated for this purpose, and have historically always been a part of any community. Each parcel division creating a lot was intended to be lived on in a low impact way. That is why the Growth Management Act does not require that rural lands be part of the GMA Comprehensive Planning, because in rural lands, very little infrastructure is needed to support that life style. But, in the urban areas, a great deal of infrastructure must be considered. The GMA’s purpose is an urban planning tool, to assure that infrastructure is in place for the expected growth in the urban areas.

Resource land under the GMA, on the other hand, is intended to be lands used for revenue generation, with a sustainable long term income. These lands are intended for a business that must be economically viable, with long term commercial significance. The GMA also stipulates that the land is not to be in resource designation, if it has a better and more productive use, considering development in the area. All businesses have overhead that must be considered. To operate a resource business, one must purchase land, buildings, products and equipment. Most commercially viable resource businesses are connected with the United States Department of Agriculture in some way. One of those ways is receiving financial assistance from the agency for overhead expenses, purchases and losses. Under the USDA Farm Loan Program, all beginning farmers, ranchers or SDAs must meet all basic loan program eligibility requirements. Beginning businesses must not have operated a farm for more than ten years and must not own property totaling more than 30 % of the average farm acreage in the residing county. Statistically, the average farm in Clark County is twenty acres or less. Dividing that number by 30% indicates that the USDA federal farm loan would only consider a farm that is 6.66 acres or less in size.

Clark County Citizens United, Inc. is adamantly opposed to the Agriculture Production District proposed by staff. This is an attempt to force rural landowners to combine their rural parcels under a resource category, even though they are not conducting a resource business. This proposal is also an arbitrary method to force the landowner to place their land in current use taxation by way of regulation. Property rights would be severely adversely affected with the county's attempt to force the creation and preservation of the land in large parcels by way of a zoning regulation.

Sincerely,

Carol Levanen, Ex. Secretary
Clark County Citizens United, Inc.
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