

**Agricultural Advisory Committee  
Meeting Summary  
February 21, 2024**

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|-------------|--|
| Start Time: | 3:00 p.m.  |
| Location:   | Hybrid Meeting – Zoom & at Whatcom County Planning & Development |

| <b>Meeting Highlights</b>  |
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| There were 12 people in attendance (Voting members: 6 of 7, Staff members: 3, Ex-Officio: 2 Members of the public: 1). |

| <b>Attendees – Members</b> | <b>Affiliation</b>            | <b>Present</b>                      |
|----------------------------|-------------------------------|-------------------------------------|
| Chapman, Alan              | Whatcom Conservation District | <input checked="" type="checkbox"/> |
| McDermott, Matthew         | Ag Producer                   | <input checked="" type="checkbox"/> |
| Kubalek, Roger             | Ag Producer                   | <input checked="" type="checkbox"/> |
| Singh, Gurjit              | Ag Producer                   | <input type="checkbox"/>            |
| Harron, Elli               | Consumer of Ag Products       | <input checked="" type="checkbox"/> |
| Welch, Chantel             | Ag Programs                   | <input checked="" type="checkbox"/> |
| Likkel, Fred               | Whatcom Family Farmers        | <input checked="" type="checkbox"/> |
| VACANT                     | Ag Processor                  | <input type="checkbox"/>            |
| VACANT                     | Ag Producer                   | <input type="checkbox"/>            |
| VACANT                     | Ag Producer                   | <input type="checkbox"/>            |
| VACANT                     | Ag Producer                   | <input type="checkbox"/>            |
| VACANT                     | Ag Producer                   | <input type="checkbox"/>            |
| VACANT                     | Ag Producer                   | <input type="checkbox"/>            |

|                       |   |
|-----------------------|---|
| <b>Quorum Present</b> | <b>YES</b> <input checked="" type="checkbox"/> <b>NO</b> <input type="checkbox"/> |
|-----------------------|---|

| <b>Attendees – Ex-Official/Contributing</b> | <b>Affiliation</b>            | <b>Present</b>                      |
|---|-------------------------------|-------------------------------------|
| Corina Cheever                              | Whatcom Conservation District | <input checked="" type="checkbox"/> |
| Benedict, Chris                             | WSU Extension                 | <input type="checkbox"/>            |
| Hall, Alex                                  | NRCS                          | <input type="checkbox"/>            |
| Hallberg, Brooklyn                          | FFA Youth                     | <input checked="" type="checkbox"/> |

| <b>Attendees - Staff</b> | <b>Present</b>                      |
|--------------------------|-------------------------------------|
| Dakota Stranik           | <input checked="" type="checkbox"/> |
| Cliff Strong             | <input checked="" type="checkbox"/> |
| Chris Elder              | <input checked="" type="checkbox"/> |
|                          | <input type="checkbox"/>            |

| <b>Others Present</b> |
|-----------------------|
| Kim Hallberg          |

**Zoom Recording:**

[https://us02web.zoom.us/rec/play/VflmJLbwsY0kN0hdov6W9mKXwJbmWTrcusUr3XeqSnBj5Qb-ngBqAMZTQHhZNby5JQ5qRYbbGPWU5eSO.8frqnPJakHEjVUZ2?canPlayFromShare=true&from=my\\_recording&continueMode=true&componentName=rec-play&originRequestUrl=https%3A%2F%2Fus02web.zoom.us%2Frec%2Fshare%2FGkSTMOqZJHCcOB-\\_pc65ArixvdtTCN8KWpHhVVqZAEmlF2OdArnNhJH0Oo\\_os32w.tLbCH0iVCQm2YaD4](https://us02web.zoom.us/rec/play/VflmJLbwsY0kN0hdov6W9mKXwJbmWTrcusUr3XeqSnBj5Qb-ngBqAMZTQHhZNby5JQ5qRYbbGPWU5eSO.8frqnPJakHEjVUZ2?canPlayFromShare=true&from=my_recording&continueMode=true&componentName=rec-play&originRequestUrl=https%3A%2F%2Fus02web.zoom.us%2Frec%2Fshare%2FGkSTMOqZJHCcOB-_pc65ArixvdtTCN8KWpHhVVqZAEmlF2OdArnNhJH0Oo_os32w.tLbCH0iVCQm2YaD4)

**1- Roll call and introductions**

A quorum was present.

**2- Agenda review and adjustments**

Elli motioned to approve agenda, Matt seconded, agenda was unanimously approved. Fred proposed bringing some key issues from AAC to WID meetings and continuing to advertise vacancies that need filled. His idea was supported, though it was agreed that feedback from other groups does not replace the need to fill vacancies.

**3- Presentation and discussion of Rural Land Study – Chris Elder**

Chris began with a brief overview of the Whatcom County Watershed Portal and how to use it to analyze land use in Whatcom County. The viewer is available here: <https://wria-1-data-hub-1-whatcom.hub.arcgis.com/>

Alan requested that when updated layers come into the Rural Study Areas that the old data also be maintained as a comparison

Chris then presented on the Rural Land Study and the identification of a number of Rural Study Areas that based on soil type, historical use, and other factors merit heightened protections as valuable agricultural land. These areas are all within the Rural Zone and therefore do not have the same protections as Ag-zoned parcels. These Rural Study Areas comprise approximately 28,449 acres of valuable agricultural lands that are at increased risk of development. The data was last updated in 2019 and is in the process of being updated again in 2024. The 2019 data shows a total of 2092 potential dwelling units that could be constructed within the Rural Study Areas. Further discussion is needed surrounding what increased protections might be put into place to preserve these lands for agriculture.

The topic of Open Space properties not actively being used for ag was brought up by Alan - Chris suggested is there a way that local ag groups or the county could work with landowners to get fallow parcels back into ag production to both meet compliance requirements and increase access to ag land?

Urban Growth Areas were acknowledged, and that cities such as Lynden, Everson, Nooksack, & Sumas are surrounded by agricultural land. Any expansion of these cities has an impact on agriculture and is within the purview of the AAC.

**4- 2025 comprehensive plan review – discussion of major concepts that need to be addressed – Cliff Strong**

Cliff Strong led a discussion to review compile recommendations for issues that need to be addressed in the Agricultural Land section of Chapter 8, Resource Lands.

Specific goals will come after this general overview

First item was changed to emphasize that re-zoning of the RSA's is desired, but that it is also important that adequate compensation be provided to landowners for loss of development rights.

Later in the process it would need to be clarified if (1) the down-zone would be voluntary or mandatory, and (2) at what value compensation might be offered.

Language was refined to be more inclusive of Canadian family farmers that own and operate ag land in Whatcom County: "Explore new ways to support ag land succession that keeps ownership local."

A line was added to support ag processing and marketing of value-added products: "The county should give more weight to supporting value added processing facilities and services (e.g. meat processing, etc.) so as to better support ag viability".

Fred motioned approval of the comments. Roger seconded. With no objections, the motion passed unanimously.

### **5- Open public session**

There were no comments from the public.

### **6- Review and approval of previous meeting minutes**

Motion to approve by Roger, seconded by Chantel. With no objections, the January minutes were unanimously approved.

### **7- Staff updates**

Dakota went over how the public can access AAC meeting recordings as well as minutes & agendas through the AAC webpage (<https://www.whatcomcounty.us/241/Agricultural-Advisory-Committee>) and/or the Agenda Center (<https://www.whatcomcounty.us/agendacenter>).

Dakota presented a list of possible actions that staff could take to support the AAC if desired, including:

- Adding an online web form for public submission of ag issues for AAC consideration
- Initiating periodic AAC reports to County Council
- Updating the Ag Strategic Plan for clarity and to include current data
- Draft documentation for requesting an Agricultural Planner position

Alan suggested perhaps there is a way to better update the public on what the AAC is working on - blog or other media on the AAC website?

Some interest was expressed in updating the Ag Strategic Plan, but it was determined that a work plan should be established before moving forward on any of these items.

It was agreed that a subcommittee would meet to clarify more specific AAC goals & objectives as well as aligning better with other committees. Alan, Roger, and Elli agreed to participate in this effort. Alan will coordinate.

It was suggested that the AAC might offer refreshments in order to help with engagement from the public.

**8- Member updates**

Elli suggested considering continuing meetings through the summer with the considerable workload at hand. General support was expressed, but no formal decision was made.

Some discussion was had around a recent documentary produced by Whatcom Family Farmers, "Losing the Farm":

Elli suggested a recent documentary, Common Ground.

**9- New business**

Fred suggested future discussions regarding the Voluntary Stewardship Program (VSP). A presentation on CPAL, Farm Plans, & VSP was tentatively scheduled for the April meeting, since March is a busy month for Whatcom CD (they would be co-presenting).

**10- Action items and next agenda**

This item was not discussed

**11- Dismissal and Next Meeting**

The meeting adjourned at 5:02 p.m. The next meeting is scheduled for March 13, 2024 from 3-5 p.m. to be held both in-person and virtually.

# 2025 CompPlan Update

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## Agricultural Advisory Committee Recommendations

### General Comments

- Ag zoning ought to be expanded to cover more lands:
  - The AAC has determined that the Rural Study Areas meet the Agricultural Lands of Long-Term Commercial Significance criteria and therefore recommends that the Council rezone these areas to Agricultural zoning contingent on pursuing/providing compensatory funding to property owners for lost development rights.
  - The AAC recommends evaluating and eliminating nonconforming lots (combine nonconforming plots under same ownership) located in Agricultural Zones. Parcelization of existing agricultural zoned land has occurred and is relatively widespread in the Ag Zone, with an average parcel size of 17 acres.
  - Change the Agriculture Protection Overlay to apply to clusters of land 10 acres or larger, rather than 20 acres.
- The AAC supports recommendations from the Housing Advisory Committee that encourage options for urban infill to reduce UGA expansion.
- Regarding climate change:
  - There is a noticeable lack of climate-related language in here, an acknowledgement of the effects of a changing climate and strategies to maintain agricultural viability would be useful.
  - We need to more clearly integrate climate change, equity, and economic security throughout the CompPlan.
  - Support a thriving local agriculture and food system economy and food security, considering the impacts of climate change on agriculture as well as equity and housing needs of farmworkers.
- Regarding land/infrastructure preservation:
  - Continue to protect ag lands through existing County programs
  - Explore new ways to support ag-land succession that keeps ownership local.
  - Develop new strategies to reduce urban sprawl and preserve rural characteristics of urban edge development
  - Incentivize agricultural operations and work cooperatively to improve existing and install new state of the art infrastructure.
- Regarding water rights and use:
  - Protect agriculture as an allowed use for permit exempt wells.
  - Support efficient application process for new water rights.
  - Throughout the document strengthen the need to address water security for farms. Note the Council's goals in goal 6 of their priorities resolution: Work to provide secure and legal access to water for all farmers with an end goal of water use efficiency to drive profitability for a diverse agriculture economy, recognizing that the "use it or lose it doctrine" of water rights does not promote water use efficiency.
- Update the ag descriptive language and charts using the 2022 Ag Census

- While the goals are useful in indicating a policy direction to protect agricultural lands, the policies lack adequate specificity to be able measure progress toward achieving those goals.
  - There are no metrics to measure the effectiveness of the identified actions. The policies are full of relative terms like involve, support, encourage, assist, work cooperatively, discourage.
  - Few of the stated policies identify who will be responsible for implementing them, and several policies have been worked on by other organizations.
  - There is a question whether advisory committees are supported sufficiently to have the information to evaluate options to discharge their responsibilities.
  - Several of the policies are under the authority of State agencies, though land use is the cause of most water quality and quantity issues are under the authority of the City and County Governments.
  - There should be a restriction on putting people on land that cannot support the needs for water and waste treatment, rather than developing infrastructure to provide those services.
- Regarding conflicting goals:
  - When there are competing goals, there should be guidance on how to balance them (e.g., ag vs. mining vs. fish and wildlife habitat).
  - The conflicting policies within the Natural Resources Chapter 8 are not adequately addressed. How do you choose which resource is of greater value?
  - It is important to look at both the Mineral Resource section and Agriculture section on Chapter 8 as to the conflicting codes and policies.
- The relative coordination between the County and Cities on actions that impact viable agriculture should be made more transparent in the goal statements. The UGAs are still under County authority.
- Replace the term "agriculture industry" "agriculture community."
- We're all aware that flooding has become a major issue, but what most don't know (yet) is that the river has lost 30% of its capacity above Everson since the 90's. This is where the nexus of salmon habitat and farming becomes a bit challenging, but it is our job as an Ag Committee to advocate strongly for drainage to be maintained if farming is going to survive. Again, the Council priorities under goal 6: Enhance flood control and drainage vitally important to protecting people, farm families, and infrastructure. If agricultural land is used for "overflow areas," the County should also plan to facilitate drainage to enable the ability of the land to be productively farmed. Manage drainage areas, including wildlife control, to protect land intended to produce food and fiber, except where they have been placed in the conservation programs.
- Can including educating the public and involving them in the struggles farmers, farmland, and agriculture face be dispersed throughout the plan?
- The Food Systems Plan has some Goals and Action plans that I thought were clearer and may be a model to look at.
- The Co. should better support value-added processing facilities and services (e.g., meat processing, etc.) so as to better support ag viability.

## Specific Comments

- Policy 8A-3, 3.d: It is mentioned in the background that diversity of agriculture has increased. If the diversity of crops has increased and some commodities that have been growing for longer have decreased in production, are there newer agriculture practices and commodities that

would have a longer-term commercial significance than other commodities that have been operating before 1985?

- 8D-4 & 5 Surface Mining and Mineral Resource Extraction: The language suggests accommodating these activities in the Ag zone, which are currently not permitted. Concerning, given this topic has previously been discussed and determined to not be conducive to ag and/or the returning of soils to productive ag activities after surface mining/extraction activities.
- Policy 8C-4: Are there programs to help small farms that are struggling, not just new farmers?
- Policy 8E-3: Instead of just encouraging the use of these practices to protect water quality, is there a way to help these farmers perform these practices?
- Policy 8A-1 Conserve productive agricultural lands and agricultural resource lands, including areas with prime soils that are not now zoned agriculture. With a 20 – 100-year plan.
  - ADD Give high priority to these lands over MRL that could contribute to the degradation of these rural lands with prime soils.
- Chapter 8 page 12, Mining activities, such as the extraction of sand and gravel, are often an alternative use of land zoned agriculture. Such activities may limit options for later agricultural use, depending upon the intensity of the activity and the extent of soil rehabilitation efforts.
- Policy 2 DD-2 Protect the character of the rural area through the County's development regulations. What are the county's development regulations that address this? These regulations should be addressed herein, stated with clarification on how that goal will be met.
- 8M-2. Protect areas where existing residential uses predominate against intrusion of mineral extraction and processing.
  - What is the density that makes an area residential instead of rural? Why protect residential areas and not rural areas from intrusion of mineral extraction?
  - This needs to be expanded to state: Protect areas where existing residential and rural uses predominate against intrusion of mineral extraction and processing.

## Individual's Comments

### Chantel

- To maintain long-term agricultural viability, the Whatcom County Council has set a goal of preserving 100,000 acres of farmland within the county (RES 2009-040)

To achieve this goal, the Agricultural Advisory Committee recommends the following:

1. The 2019 Rural Land Study identified 28,449 acres with 'high agricultural value' as determined by; 1) Proximity to active agricultural areas; 2) Current land use characterized by agriculture – visual analysis; 3) High percentage of APO and prime soils; 4) Parcelization of the area; 5) Land use as identified on Assessors records (Agricultural Open Space), and 6) Evaluation of forested areas for potential ecological benefits adjacent to agricultural use. These spatial data were applied to evaluate the Agricultural Lands of Long-Term Commercial Significance designation criteria as identified in Whatcom County Comprehensive Plan policy 8A-3. **The AAC determines that the Rural Study Areas meet the Agricultural Lands of Long-Term Commercial Significance criteria and therefore recommends that the council rezone these areas to Agricultural zoning and pursue/provide compensatory funding to property owners for lost development rights.**  
\*Current agricultural zoning has a minimum parcel size of 40 acres, which may be appropriate for these areas though it is noted that many farms in these areas are smaller commercial farms and therefore a minimum parcel size of 20 acres might be more appropriate.
2. Parcelization of existing agricultural zoned land has occurred and is relatively widespread in the Ag Zone with an average parcel size of 17 acres, the AAC recommends **evaluating and eliminating nonconforming lots** (combine nonconforming plots under same ownership) located in Agricultural Zones.
3. Change the **Agriculture Protection Overlay to apply to clusters of land 10 acres or larger**, rather than 20 acres.

Additionally, we highlight the connections between our recommendations that strengthen and support the work of other committees—notably the Wildlife Advisory Committee, the Climate Impact Advisory Committee, and the WRIA 1 Planning Unit—and support recommendations from the Housing Advisory Committee that encourage options for urban infill to reduce UGA expansion.

- I mainly have questions about what has been done and where the main roadblocks are for protecting the remaining 12,000(ish) acres of ag land to reach 100,000 acres. If I read correctly, that amount of land was designated back in the 1990s, so what are the main reasons for it still not being secured? Knowing the roadblocks may provide a clearer path ahead and allow for better recommendations for 8A-2 and 8A-3. The 2019 Rural Lands Study Update made a pretty clear case for expanding APO to the areas of greatest concern that are also adjacent to protected lands, and noted " Existing programs, such as the Purchase of Development Rights Program and Open Space Farm and Agriculture Current Use Assessment program, are known to be effective tools to provide heightened agricultural protection measures" so I would recommend that we strengthen language around expanding APO and funding compensation for development rights.
- There is a noticeable lack of climate-related language in here, an acknowledgement of the effects of a changing climate and strategies to maintain agricultural viability would be useful. For example, how will we support producers through increased winter precipitation (managing

flooding) and decreased summer precipitation (managing drought). I see this as an expansion of the following 8A-2 bullets "Working cooperatively...to address water quality impacts" and "securing an adequate, sustainable, and legal supply of irrigation water..." as well as \*E & 8F.

## Matt

- Exhibit A of the Executive Memo related to the Resource Lands Chapter: Emphasis on sustainable ag, climate smart ag, resilient ag, etc. and suggestions of incentives to help farmers change practices might need clearer definitions. And, overall, a means to measure/track the goals seems essential to measure impact.
  1. "Consider the impacts of climate change, water resources..." Wondering how this overarching statement translates to policy action?
  2. Water: Supporting a pivot from "use it or lose it" makes good sense, as does water supply planning.
  3. Promote ag/processing sustainability: Great and how?
  4. Implement Whatcom County Food Assessment: Great
  5. Improve wages, housing, etc.: Curious how the actionable details would look from a policy standpoint?
  6. Ensure safe and affordable on-farm housing, transport, insurance: Same, curious how actionable details would play out.
  7. Increase demand for local...: Sounds good
  8. Increase local food producer capacity: I think the important component here is to support policy/permit pathways that accommodate various size/scale operations rather than a one-size fit all. I think that's what's trying to be relayed in original statement?
  9. Ag Research: Great
  10. Enhance flood control: Great
  11. Encourage climate smart farming...: How is this different from #3 above?
  12. Preserve productive farmland, implement Ag Strategic Plan, RSA rezoning...: Yes, supports the 100,000-acre goal
  13. Expand allowable ag to non-traditional farm models: What examples are being targeted?
- CompPlan Goals Reviewed:
  1. 8A Conserve/Enhance Land base
    - 100,00-acre land base: #12 from above, including RSA rezone, support this goal
    - Is the density credit program active? Or is this being proposed for the 1<sup>st</sup> time?
  2. 8D Reduce Land Use Conflict:
    - 8D 4/5 Surface Mining and Mineral Resource Extraction: The language suggests accommodating these activities in the Ag zone, which are currently not permitted. Concerning, given this topic has previously been discussed and determined to not be conducive to ag and/or the returning of soils to productive ag activities after surface mining/extraction activities.

## Roger

1. Ag Support Programs:
  - a. Best Management Practices
    - i. Incentives - environmentally friendly and conservation practices
    - ii. Focus on regenerative (buzz word, but likely to stay relevant for foreseeable future)
    - iii. Climate Resilience
    - iv. Measure and report
  - b. Marketing and Infrastructure Improvement
    - i. Highlight Whatcom County products

- ii. Encourage agritourism
- iii. Help protect/buffer from import price gouging
- iv. Gain funds for grants and loan assistance to Farmers and supporting industries
- v. Public Education towards the value of agriculture within the county and fair representation of sensitive issues involving agriculture
- vi. Measure and report
- c. Land/infrastructure Preservation
  - i. Continue to protect ag lands through existing county programs
  - ii. Explore new ways to support ag-land succession that keeps ownership within Whatcom County or Washington State and reduces/deters foreign or out-of-state land holders.
  - iii. Develop new strategies to reduce urban sprawl and preserve rural characteristics of urban edge development
  - iv. Incentivize agricultural operations and work cooperatively to improve existing and install new state of the art infrastructure.
- d. Water Rights
  - i. Protect agriculture as an allowed use for permit exempt wells.
  - ii. Support efficient application process for new water rights.

## Chris

Some suggestions. Depending on how things play out with Ecology some of the language in here will be outdated.

- The most recent ag census (2022) should be out any day, so depending on when this gets updated could pop in those numbers.
- The economic impacts of agriculture on Whatcom County are substantial. According to the U.S. Department of Agriculture's 2012 (2017) Census of Agriculture, 1,483 (1,712) Whatcom County farms produced a market value of \$326 (\$372) million in crops and livestock that year, ranking eighth in the state. Milk produced locally in 2013 (2017) reached an all-time high market value of \$246.1 (\$180.5) million. Raspberries and blueberries combined for a record market value of \$123.6 (\$114 - though this number is considerably higher in 2023) million in 2014. There are new values for these as well.
- Average annual agricultural employment in Whatcom County in 2014 was 3,512, with substantial seasonal variation within that average, according to the Washington State Employment Security Department. Locally, agricultural jobs soared to 5,661 in the third quarter of 2015. In addition, farms and support businesses, such as equipment retailers, veterinarians, processing facilities, and feed suppliers employ many Whatcom County residents.
- (*New numbers in parenthesis*): In 1949, 200,000 acres of land were reported to be in farm production in Whatcom County. Between 1949 and 1992, land in farm production declined. In 2012 (2017), agriculture accounted for 115,831 (102,253) acres, nearly 85,000 (97,747 or 49%) fewer acres than 1949. However, since 1992, the amount of land in farms has remained relatively stable (between 100,000 and 125,000 acres). But at the same time, both the number and diversity of farms in the County has been increasing. Even while the amount of land in agricultural use has remained relatively stable over the past two decades, the economic value of the products produced on those farms has increased by more than \$100 million in the same time period.
- Update chart: Whatcom County Land in Farms/ Product Market Value Over Time

## Alan

1. The goals stated are useful in indicating a policy direction to protect agricultural lands in Whatcom County, but the sub goals lack specificity to measure their impact on progress toward achieving those goals.
  - a. There are no metrics to measure the effectiveness of the identified actions. The sub goals are full of relative terms like involve, support, encourage, assist, work cooperatively, discourage.
  - b. Few of the stated sub goals identify who will be responsible for implementing them, and several sub-goals have been worked on by other organizations.
  - c. There is a question whether Committees are supported sufficiently to have the information to evaluate options to discharge their responsibilities.
  - d. Several of the sub-goals are under the authority of state Agencies, though land use is the cause of most water quality and quantity issues are under the authority of the City and County Governments
  - e. There should be a restriction on putting people on land that can not support the needs for water and waste treatment, rather than developing infrastructure to provide those services.
2. From the goal statement it is extremely difficult to understand what guidance is provided to determine tradeoffs when there are differences in actions required to make progress on competing goals in the plan or required in the GMA.
  - a. Even within the Agricultural section there is no guidance on how to balance the protection of agricultural lands with the mining of mineral resources.
  - b. There is no guidance on how to balance the needs of agriculture and fish and wildlife for habitat and water.
  - c. Similarly, there is a lack of guidance on how to reconcile affordable housing and the infrastructure to support it.
  - d. Prime agricultural lands are included in GMAs to the disadvantage of Agriculture.
3. The relative coordination between the County and Cities on actions that impact viable agriculture should be made more transparent in the goal statements. The UGAs are still under county authority.

## Fred

1. I would check the document for every place it says "agriculture industry" and consider replacing it with "agriculture community". There are places where the "industry" term is used that makes the farming community out to be an impersonal business, when the reality is that farming is at its essence a community function. We use that often for fishing and tribal resources, and we should reflect the same thing for agriculture. The vast majority of farmers aren't in it for the money!
2. The last time this was written water rights issues were a distant issue, and now they are very much at the forefront. Goal 8F recognizes this need, but with the upcoming adjudication the issue of safe, secure water is now a very real threat to the farming community. We are already seeing farms shut down because of uncertain water rights, letters from Ecology threatening fines of \$10,000/day if irrigation doesn't cease, and now banks starting to seriously devalue land where water rights are in question. Throughout the document we could use to strengthen the need to address water security for farms. I would note especially the council's goals in goal six: Work to provide secure and legal access to water for all farmers with an end goal of water use efficiency to drive profitability for a diverse agriculture economy, recognizing that the "use it or lose it doctrine" of water rights does not promote water use efficiency. I know the Planning Unit has been working on some language from a group of diverse stakeholders that agree with this. Perhaps we should grab onto their language to look at using for our own comments?

3. Another area I see needing to be strengthened is the drainage issues. As I know you are aware, flooding has become a major issue. What most don't know (yet) is that the river has lost 30% of its capacity above Everson since the 90's. This is where the nexus of salmon habitat and farming becomes a bit challenging, but it is our job as an ag committee to advocate strongly for drainage to be maintained if farming is going to survive. Again, the council priorities under goal six: Enhance flood control and drainage vitally important to protecting people, farm families, and infrastructure. If agricultural land is utilized for " overflow areas," the County should also plan to facilitate drainage to enable the ability of the land to be productively farmed. Manage drainage areas, including wildlife control, to protect land intended to produce food and fiber, except where they have been placed in the conservation programs.

## Brooklyn

- In Background Summary, will current market values for crops be added and will these be properly compared to older values and other crops? Will current average annual agricultural employment be added and how has it changed over the years? Will current acres of farmland and economic value of products be revised? How has the number and diversity of farms changed?
- Policy 8C-4: Are there programs to help small farms that are struggling, not just new farmers?
- Policy 8E-3: Instead of just encouraging the use of these practices to protect water quality, is there a way to help these farmers perform these practices?
- Can including educating the public and involving them in the struggles farmers, farmland, and agriculture face be dispersed throughout the plan?
- Policy 8A-3, 3.d: It is mentioned in the background that diversity of agriculture has increased. If the diversity of crops has increased and some commodities that have been growing for longer have decreased in production, are there newer agriculture practices and commodities that would have a longer-term commercial significance than other commodities that have been operating before 1985?

## Elli

- The Food Systems Plan has some Goals and Action plans that I thought were clearer and may be a model to look at.
- Priorities for Whatcom County's 2025 comprehensive plan. As stated by the County Council in resolution 2022-036, there are chapters on many intersectional issues impacted by climate change, equity, and economic security including Land Use, Housing, etc.
- We are experiencing increased severe and frequent effects of climate change and we are running out of time to mitigate and adapt to the worst of these effects on climate change, therefore we need to more clearly integrate climate change, equity and economic security throughout the CompPlan.
- Preservation of the Whatcom County Farmlands and agriculture industries is a common goal.
- Support a thriving local agriculture and food system economy and food security, considering the impacts of climate change on agriculture as well as equity and housing needs of farmworkers.
- The conflicting codes within the Natural Resources Chapter 8 are not adequately addressed. How do you choose which resource is of greater value?
- It is important to look at both the Mineral Resource section and Agriculture section on Chapter 8 as to the conflicting codes and policies.
- The main goals under Agriculture are:
  - 1) Conserve and enhance Whatcom County's agricultural land base for the continued production of food and fiber

- 2) Maintain and Enhance Whatcom County's agricultural products industry as a long-term and sustainable industry.
- 3) Preserve and enhance the cultural heritage that is related to agriculture.
- 4) Reduce land use conflicts between Whatcom County's agriculture and non-agricultural landowners.
- I agree with the strategies outlined for Goal 1, Conserve productive agricultural lands and agricultural resource lands with prime soils, etc., Encourage farming on rural lands, etc.
- Policy 8A-1 Conserve productive agricultural lands and agricultural resource lands, including areas with prime soils that are not now zoned agriculture. With a 20 – 100-year plan.
  - ADD Give high priority to these lands over MRL that could contribute to the degradation of these rural lands with prime soils.
- Chapter 8 page 12, Mining activities, such as the extraction of sand and gravel, are often an alternative use of land zoned agriculture. Such activities may limit options for later agricultural use, depending upon the intensity of the activity and the extent of soil rehabilitation efforts.
  - This would also be the case for agricultural lands in close proximity to a MRL.
  - What criteria are used to assess the impacts of mining activity on agricultural lands, such as, soil, dust, water supply, air quality, industrial site established versus rural character.
  - 8A-7. Work with farmers and the rural community to prioritize agricultural activity in land use decisions when land is composed of prime and/or productive agricultural soils and agriculture is the highest value resource. How is the highest value resource determined? Based on economics? On rural character or community concerns? On cultural heritage of rural life? Environmental preservation or Impact on climate change?
- Policy 2 DD-2 Protect the character of the rural area through the County's development regulations. What are the county's development regulations that address this? These regulations should be addressed herein, stated with clarification on how that goal will be met.
- Policy 2 DD7. Maintain the historic character and cultural roles of each rural area and community. What are the characteristics that need to be preserved in each area.? Who decides what these characteristics are? No more than one home per 5 acres? Proximity to urban growth areas? Historic use of property?
- 8M-2. Protect areas where existing residential uses predominate against intrusion of mineral extraction and processing.
  - What is the density that makes an area residential instead of rural? Why protect residential areas and not rural areas from intrusion of mineral extraction?
  - This needs to be expanded to state: Protect areas where existing residential and rural uses predominate against intrusion of mineral extraction and processing.
- Goal 4) Reduce land use conflicts between Whatcom County's agriculture and non-agriculture uses.
  - When a MRL overlay has not been updated with new information on population growth within 2 miles of MRL and the County has allowed new residential areas to locate near MLR, that new information will take precedence over allowing application to be granted.
  - When conflicts within these areas are brought to the County Planning Department, via application for land use that impacts historic character and rural character, that has adverse impacts on surrounding farmland, and dramatically changes the rural character of the area, what criteria are used to determine impacts and whether application is allowed to proceed?
  - How do you protect farmland when you allow adverse impacts within the rural area to develop, even when you already have codes and policies that should protect farmland in

place? Farmland with prime soils should take precedence over other land uses that meet the criteria outlined in the Whatcom County Agricultural Strategic Plan, Resolution 2018-027. When determined that the proximity of land conflicts will have major negative impacts of farmland. Which codes take precedent? Water is critical for farming; which resource gets the water?

For Example

- 8 K-3. Avoid adversely impacting ground water and surface water quality. The protection of aquifers and recharge zones should have precedence over surface mining in the event it is determined by the county that adverse impacts cannot be avoided through the standard use of best management practices for reclamation or on-site storage.
- Groundwater is essential to farming, impacting water quality or reducing ground water that should be used for farming which should once again be given priority.
- This code should state:  
The following criteria will be used to determine the impacts on ground water and aquifers.
  - Location of fish bearing streams that will be impacted
  - Proximity to Creeks and Rivers
  - Proximity to residences that may have their wells impacted.
  - Proximity to farmland that has future significance that meets the following criteria, based on
    - Whatcom County's Agricultural Strategic Plan
    - The majority of the area contains Prime Farmland Soils
    - Land use settlement practices are generally compatible with agricultural practices
    - The predominate parcel size in the area is large enough to adequately maintain agricultural operations.
    - Proximity to agricultural markets.
    - Prime Farm Land should have precedence over all other land use conflicts and meets many of the Councils Goals for GMA 2025, Including
      - Chapter 8, Natural Resources
      - Additional Criteria for Designated Agricultural Areas
    - 15. Prohibit MRL designations in areas designated Agriculture by the Whatcom County Comprehensive Plan that contain "Prime Farmland Soils" determined by the Natural resource Conservation Service.
    - Furthermore, meets the Councils Goals of:
      - Build resilience to climate change
      - More thoroughly consider impacts of climate change, equity, and economic security in relation to natural hazards mitigation and emergency response
      - Incorporate climate change mitigation adaptation, resilience, and greenhouse gas emission reduction throughout the Comprehensive Plan.
      - Protect Farmland
      - Support a thriving local agriculture and food system economy and food security, considering the impacts of climate change on agriculture as well as equity and housing needs of farmworkers.
      - Plan for future farmland preservation.

- The Agricultural Advisory committee will have a meaningful role in identifying agricultural lands for preservation.