

Uniq ue ID	Date	Commenter Name	Type of Comment	Topic	Summary
18	5/30/2023	Ken Miller	Question	Zoning	Asked which properties were included, and how that impacts development potential and Designated Forest Land enrollment. Requested Meeting
19	5/31/2023	Kris Knutzen	Change Requested	Zoning	Owns 40 acres along with neighboring 15 acre parcel that would make an isolated pocket of LTA under scenario 2. The properties have 100 year old trees. Goal of this property is to delay development and grow trees. A change in zoning from it's current 1/5 to 1/20 would reduce property value.  Clearing for agricultural land requires a different forest practices permit. Additionally there are critical areas that would reduce the areas for conversion to an amount will below the 40 acre threshold proposed under scenario 2.  It is dishonest to rezone a property for a use that would not be allowed under current critical area regulations. Would we be compensated for lower allowable housing density?
20	6/1/2023	Cindy Gorgas	Support	Zoning	Asked if properties will remain in Long-Term Agriculture zoning.
21	6/15/2023	Robert McIntosh	Question	Zoning	Asked if there is a map that shows the proposed changes with current long term agriculture. Asked if land that is used for growing timber (either designated or not) could be included/
22	6/16/2023	Kathy Hargrave	Change Requested	Zoning	Nielsen Pacific/Holroyd owns and operates two pits affected by the 2023 ARL update located on the east side of Old Pacific Highway SE and south of Durgin Road SE.  NRCS classified mining lands as gravel pits, not a soil component, and as such, they cannot even be eligible for a farmland classification. In the event that co-designation is applied, existing policy language (Chapter 3, Goal 8, Policy 9) in the comprehensive plan that limits accessory uses to mining to adjacent lands that are not co-designated should be revised, as this language would impact customary aspects that are allowed with mining use and is in direct conflict with uses allowed by definition under the Washington State Mining Act.  Our first request is that the Planning Commission recommend to the BoCC that MRL and ARL properties not be co-designated because "gravel pits" under NRCS is not a soil component and not eligible for farmland classification. Our second request is, in the event that it is appropriate to co-designate MRL and ARL property, to allow processing on these co-designated lands.
23	6/17/2023	Tim Trohomovich, Futurewish	Change Requested	Zoning	Futurewise strongly supports the update and has several recommendations to be incorporated. - Increasing farm and ranch land designated as Long-Term Agriculture is necessary to protect working farms from being paved over. - The designation criteria should designate and zone prime farmland soils and soils of statewide important as Long-Term Agriculture as WAC 265-190-050(3)(c)(i) provide. - The Designation criteria should designate and zone as LTA smaller parcels when they are contiguous with other agricultural lands. - The minimum density for development should be one unit per 40 acres. - Please add clarifying language to Chapter 3 of the Comprehensive Plan, as needed to comply with state law. - The County should adopt a policy to analyze the feasibility of an agricultural water bank to address some concerns over irrigation water. - Futurewise recommends against the test out options because of the variability of soils makes the process of verifying soils difficult and recent increases in irrigated farmland make excluding currently unirrigated land problematic.
24	6/13/2023	Jennifer Colvin	Support	Zoning	County should look at parcel size combined with owner to give a more accurate picture of larger areas of land used for agriculture. Including smaller parcels of the same owner can add up to a significant area. County should consider soil types that support livestock agriculture, not just crops.
25	6/13/2023	Amanda Cecil	Question	Zoning	Asked if property was included. Responded that the two properties will not be included in any option, as proposals are drafted currently.
26	6/14/2023	League of Women Voters	Support	Zoning	League of Women Voters recommends the Thurston County Planning Commission move forward a recommendation as presented in the options, including comp plan and code changes. Additionally, LWVTC agrees with the stakeholder group recommendations to compensate landowners for lost land value, and that the Planning Commission should forward the stakeholder group recommendation on this to the BoCC as well.
27	6/14/2023	Randy Person	Change Requested	Zoning	Our family forest stands development pressure because of other income. Future ability to convert is important and raising minimum lot size will make it more expensive to do. Please leave zoning as is for our parcel.
28	6/14/2023	Bonnie Blessing	Change Requested	Zoning	For proposed LTA designation, if certain soils included are prime if drained, those soils support spotted frogs most likely (on or near Mukilteo Muck soils). It is unlikely that draining the soils is appropriate for frogs. Does designation encourage draining?
29	6/15/2023	John Grenier	Question	Zoning	Asked if a property is included. Responded that property is included in baseline scenario but not other 2 scenarios.
30	6/16/2023	Jamie Rainwood	Support	Zoning	I support protecting farm land and farmers.

31	6/18/2023	Vanessa LaVelle	Change Requested	Zoning	I urge you to recommend approval of the new policies and regulations for designation of working farms in Thurston County, recommend that farmland of statewide important be considered if other criteria are met, include parcels smaller than 20 acres when adjacent to LTA designation, and adopt better regulations to protect farmland from McMansions and incompatible uses.
32	6/18/2023	Joel Carlson	Change Requested	Zoning	I urge you to recommend approval of the new policies and regulations for designation of working farms in Thurston County, recommend that farmland of statewide important be considered if other criteria are met, include parcels smaller than 20 acres when adjacent to LTA designation, and adopt better regulations to protect farmland from McMansions and incompatible uses.
33	6/18/2023	Loretta Seppanen	Change Requested	Zoning	I support the change to the soils criterion for LTA designation. I support parcels with 75% or more coverage; recommend no change from the 20 acres, support deleting the block size criteria or looking at a 40-acre block requirement with inclusion of smaller parcels. I urge to add a policy explicit about the development limits inherent in LTA designation. I ask that language in the comp plan be revised to delete reference to average parcel size. I support the development code changes.
34	6/18/2023	Lori Stefano	Change Requested	Zoning	These changes are not enough. I also support these next steps: move swiftly to identify funding sources to compensate landowners for the lost land value, include in comp plan consideration of changes not yet considered by stakeholder group or other community outreach, like exclusion of lands from MGSA and considering farmland of statewide importance, and including an opt-in for landowners with parcels outside of LTA zones.
35	6/18/2023	Madeline Bishop	Change Requested	Zoning	I urge you to recommend approval of the new policies and regulations for designation of working farms in Thurston County, recommend that farmland of statewide important be considered if other criteria are met, include parcels smaller than 20 acres when adjacent to LTA designation, and adopt better regulations to protect farmland from McMansions and incompatible uses.
36	6/18/2023	Peggy Smith	Change Requested	Zoning	Increase the amount of land designated by adding additional, appropriate soil types to the soils criterion. It is vital for the county to identify funding for lost development rights. Add policy language that makes explicit the impact of LTA on subdivision. Further examine other policy issues, like exclusion from MGSA, including smaller parcels in LTA when adjacent, and including farmland of statewide importance.
37	6/18/2023	Esther Kronenberg	Change Requested	Zoning	I urge you to recommend approval of the new policies and regulations for designation of working farms in Thurston County, recommend that farmland of statewide important be considered if other criteria are met, include parcels smaller than 20 acres when adjacent to LTA designation, and adopt better regulations to protect farmland from McMansions and incompatible uses.
38	6/19/2023	Joseph Hiss	Change Requested	Zoning	Additionally, please avoid draining prime soils occupied by Oregon Spotted Frog.
39	6/19/2023	Sharon Herting	Change Requested	Zoning	I urge you to recommend approval of the new policies and regulations for designation of working farms in Thurston County, recommend that farmland of statewide important be considered if other criteria are met, include parcels smaller than 20 acres when adjacent to LTA designation, and adopt better regulations to protect farmland from McMansions and incompatible uses.
40	6/19/2023	Carol Stevens	Change Requested	Zoning	Please approve designating more acres. Swiftly identify funding sources to compensate landowners for lost value. Include smaller parcels in the LTA designation. Consider farmland of statewide important soils for designation. Add policy to permit landowners outside of LTA to voluntary protect their parcels permanently.
41	6/19/2023	Stephan Giesecke	Question	Zoning	I urge you to recommend approval of the new policies and regulations for designation of working farms in Thurston County, recommend that farmland of statewide important be considered if other criteria are met, include parcels smaller than 20 acres when adjacent to LTA designation, and adopt better regulations to protect farmland from McMansions and incompatible uses.
42	6/19/2023	Liz Schotman	Change Requested	Zoning	Asked if parcel is included and if so, how compensation will be provided.
43	6/19/2023	Judy LeBlanc	Change Requested	Zoning	I urge you to recommend approval of the new policies and regulations for designation of working farms in Thurston County, recommend that farmland of statewide important be considered if other criteria are met, include parcels smaller than 20 acres when adjacent to LTA designation, and adopt better regulations to protect farmland from McMansions and incompatible uses.
44	6/19/2023	Timothy Leadingham	Change Requested	Zoning	Consider conservation of forestland which is also important to carbon sequestration goals.

					<p>We have 108 acres between Scott Lake and Millersylvania State Park. We live on a farm and have spent years rehabilitating this property, and all but 2 acres are enrolled as Designated Forestland. About 96 acres are subject to the potential rezone to Long-Term Agriculture.</p> <ul style="list-style-type: none"> <li>- We do not believe forest land owners were properly notified, as "agriculture zoning" is misleading to those of us enrolled in Designated Forestland. Forest landowners were not represented in early stakeholder meetings.</li> <li>- We believe forested parcels should not be included in the pool of potential long-term agriculture. Forestry is not included in the state definition of agriculture.</li> <li>- Housing and forestry can be compatible even in RRR 1/5, so further downzone serves no purpose for forestland.</li> <li>- Without compensation, rezoning is a huge taking of property rights.</li> <li>- If not rezoned, the proposal would unfairly require cluster housing on large parcels without incentives or compensation.</li> <li>- Lands with ag soils but no water rights for irrigation cannot reasonable qualify for "commercially significant agriculture".</li> <li>- Criteria for Long-Term Agriculture should be at least 100 acres with 75% prime farmland soils farmable without irrigation.</li> </ul>
45	6/19/2023	Ken & Bonnie Miller	Change Requested	Zoning	
46	6/20/2023	Kim Abbey	Change Requested	Zoning	Please approve designating more acres. Swiftly identify funding sources to compensate landowners for lost value. Include smaller parcels in the LTA designation. Consider farmland of statewide important soils for designation. Add policy to permit landowners outside of LTA to voluntary protect their parcels permanently.
47	6/20/2023	Christy Bear	Change Requested	Zoning	Please approve designating more acres. Swiftly identify funding sources to compensate landowners for lost value. Include smaller parcels in the LTA designation. Consider farmland of statewide important soils for designation. Add policy to permit landowners outside of LTA to voluntary protect their parcels permanently.
48	6/20/2023	Andy Sorter	Change Requested	Zoning	Please include information about whether target properties are currently taxed as designated forest lands, as future use is harvest with a 50-60 year harvest cycle. Please encourage the commission to consider how fast this area is growing and setting aside lands to rapidly expanding rural areas (93rd and Littlerock road) plays into need for housing. I support comments from the meeting that the County should be responsible for compensating landowners for the loss of development rights.
49	6/20/2023	Robert McIntosh	Support	Zoning	We are submitting these comments in our capacity as tree farm owners, and not in Robert's capacity as a member of the Thurston County Agriculture Advisory Committee. We fully concur with the proposals to expand the amount of County land designated for long-term agriculture, even though a substantial part of our tree farm is added to that designation. We are concerned about accelerating loss of county farmland and believe this is an important tool to slowing farmland loss. We have mixed feelings about adding forest land such as ours to the designation. We would be sad to see forest land converted to farming use, because forest provides more habitat, captures more carbon than farmland, although we recognize a conversion at some point may be necessary. We ask only that conversion be done as a last resort after all other farmland preservation strategies have been exhausted. We strongly feel landowners should be compensated for loss in development rights.
50	6/20/2023	Pat Labine	Support	Zoning	I serve on the Agriculture Advisory Committee and Board of the Community Farmland Trust. I support changes to increase the probability of farmland being preserved for future food production. I give my support to the position put forward by the League of Women Voters that the County examine the current exclusion from LTA designation lands within the McAllister Geologically Sensitive Areas. These areas consist of large turf tracts and berry fields. They are designated by the American Farmland Trust. Presumably past exclusion was on pesticide and fungicide use which I argue is more tightly regulated now.
51	6/20/2023	Stephan Giesecke	Change Requested	Zoning	Parcel 13934210000 is hydric soil and high groundwater hazard. I cannot even walk to the end of this property due to danger from sinkholes filled with water. According to County regulation, wetlands cannot be graded, filled, or disturbed by machinery for farming or other purposes. This parcel should be removed from scenario 2 and all future options.
52	6/20/2023	Sherry Buckner	Change Requested	Zoning	Comment specific to prime farmland soils with wetlands and habitat of Oregon Spotted Frog. Health of soil is connected to health of Oregon Spotted Frog habitat. Disturbance of water levels is an indicator for down land pollution and flooding. Adding more agriculture land seems like a wise investment. I suggest that strong protections for the health of the land and Oregon Spotted Frog habitat be administered. Avoid draining prime soils occupied by Oregon Spotted Frogs.
53	6/20/2023	Mike McCormick	Change Requested	Zoning	I urge you to recommend approval of the new policies and regulations for designation of working farms in Thurston County, recommend that farmland of statewide important be considered if other criteria are met, include parcels smaller than 20 acres when adjacent to LTA designation, and adopt better regulations to protect farmland from McMansions and incompatible uses.
54	6/21/2023	Janae Huber	Change Requested	Zoning	I urge you to recommend approval of the new policies and regulations for designation of working farms in Thurston County, recommend that farmland of statewide important be considered if other criteria are met, include parcels smaller than 20 acres when adjacent to LTA designation, and adopt better regulations to protect farmland from McMansions and incompatible uses.
55	6/21/2023	Kathy McCormick	Change Requested	Zoning	I urge you to recommend approval of the new policies and regulations for designation of working farms in Thurston County, recommend that farmland of statewide important be considered if other criteria are met, include parcels smaller than 20 acres when adjacent to LTA designation, and adopt better regulations to protect farmland from McMansions and incompatible uses.
56	6/21/2023	Olver Stormshak	Change Requested	Zoning	I urge you to recommend approval of the new policies and regulations for designation of working farms in Thurston County, recommend that farmland of statewide important be considered if other criteria are met, include parcels smaller than 20 acres when adjacent to LTA designation, and adopt better regulations to protect farmland from McMansions and incompatible uses.
57	6/21/2023	Kim Murillo	Change Requested	Zoning	I urge you to recommend approval of the new policies and regulations for designation of working farms in Thurston County, recommend that farmland of statewide important be considered if other criteria are met, include parcels smaller than 20 acres when adjacent to LTA designation, and adopt better regulations to protect farmland from McMansions and incompatible uses.
58	6/21/2023	Marcie Cleaver	Support	Zoning	We need to slow the loss of farmland in the County. Add opt in ability or appeal to opt out with clear guidelines. Farming can happen without water rights. Low density residential areas are highly inefficient and result in farmland conversion. Smaller farms are most disproportionately impacted.
59	6/21/2023	Robert Vanderpool	Change Requested	Zoning	I urge you to recommend approval of the new policies and regulations for designation of working farms in Thurston County, recommend that farmland of statewide important be considered if other criteria are met, include parcels smaller than 20 acres when adjacent to LTA designation, and adopt better regulations to protect farmland from McMansions and incompatible uses.
60	6/21/2023	Jami Heinricher	Change Requested	Zoning	I urge you to recommend approval of the new policies and regulations for designation of working farms in Thurston County, recommend that farmland of statewide important be considered if other criteria are met, include parcels smaller than 20 acres when adjacent to LTA designation, and adopt better regulations to protect farmland from McMansions and incompatible uses.
61	6/21/2023	Holly Gadbow	Support	Zoning	I support the new policies and regulations for designation of working farms in Thurston County. I recommend that farmland of statewide important be considered if other criteria are met, include parcels smaller than 20 acres when adjacent to LTA designation, and adopt better regulations to protect farmland from McMansions and incompatible uses.

62	6/21/2023	Joseph LaValle	Change Requested	Zoning	I urge you to recommend approval of the new policies and regulations for designation of working farms in Thurston County, recommend that farmland of statewide important be considered if other criteria are met, include parcels smaller than 20 acres when adjacent to LTA designation, and adopt better regulations to protect farmland from McMansions and incompatible uses.
63	6/21/2023	Callie Wilson	Change Requested	Zoning	I urge you to recommend approval of the new policies and regulations for designation of working farms in Thurston County, recommend that farmland of statewide important be considered if other criteria are met, include parcels smaller than 20 acres when adjacent to LTA designation, and adopt better regulations to protect farmland from McMansions and incompatible uses.
64	6/21/2023	Susan Davenport	Change Requested	Zoning	I urge you to recommend approval of the new policies and regulations for designation of working farms in Thurston County, recommend that farmland of statewide important be considered if other criteria are met, include parcels smaller than 20 acres when adjacent to LTA designation, and adopt better regulations to protect farmland from McMansions and incompatible uses.
65	6/21/2023	Dani Madrone, American Farmland Trust	Change Requested	Zoning	Zoning is one tool to protect farmland, but when applied inappropriately can also be a threat. Much of Thurston County's farmland is currently 1 unit per 5 acres, and with competing uses leads to conversion. Once farmland is lost to development there is no return. Throughout the stakeholder process I stressed the importance of protecting contiguous farmland to provide greater protection from surrounding uses. That is not represented in the maps in the packet because they do not include smaller parcels adjacent to larger ones. Arguments were made that including small parcels should allow in upzoning to the smallest size, but this would cause considerable harm to agriculture in the region. Additionally the 75% prime farmland soils puts more pressure on prime soils to provide space for farm infrastructure; I advocated for the 50% prime soils. Farmland of statewide importance should be evaluated and included - this was changed during this update process in state law.
66	6/21/2023	Bonnie Blessing	Change Requested	Zoning	The proposed changes may threaten habitat of species in the Habitat Conservation Plan. These changes could result in loss of Oregon Spotted Frog habitat. CAO regulations differ on ag lands than on rural residential lands. Certain farming activities or maintaining lands for ag use could be harmful to frogs. Before including these rural residential lands that are prime oregon spotted frog habitat, I ask the Planning Commission to review critical area regulations for Long-Term Agriculture and evaluate the impact to Oregon Spotted Frog. Mitigation lands needed for spotted frogs should be lands occupied by frog or breeding sites, not working lands.
67	6/21/2023	Betsie De Wreede	Change Requested	Zoning	I support adding soil tryptes to the LTA designation. Further steps to consider should 1) identify fundings sources to compensate landowners for the lost value of land 2) include in comp plan a policy that would permit landowners outside LTA but with prime soils to voluntarily permanently change their zoning, and 3) include in the comp plan changes to LTA designation not yet reviewed, such as policy that is explicit on implication of LTA on development rights, consideration of inclusion of lands within MGSA, including smaller parcels from LTA when adjacent to other LTA designation, and consider farmland of statewide importance.
68	6/21/2023	Charlotte Persons, Black Hills Audubon	Change Requested	Zoning	Black Hills Audubon Society is concerned about the impact of the proposals to Oregon Spotted Frog critical areas. We support the attached email comments from Bonnie Blessing.

**From:** [Maya Teeple](#)  
**To:** [kenbonniemiller@gmail.com](mailto:kenbonniemiller@gmail.com)  
**Cc:** [Justin Becker](#); [Ashley Arai](#)  
**Subject:** RE: Ag Zoning Update -  
**Date:** Tuesday, May 30, 2023 11:31:00 AM  
**Attachments:** [image001.png](#)

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Hi Ken,

A change in zoning would not impact your enrollment as DFL.

To answer your questions:

1. Long-Term Agriculture zoning district allows for 1 house per 20 acres. If your properties were included, the development potential would be reduced from 1 house per 5 acres to 1 house per 20 acres.
2. Between my colleague and I one of us can be available to meet and discuss more. I'm copying her here – Ashley Arai, Agriculture Community Program Manager. Please include her on any future emails as we look for a time.

Thanks,  
Maya



**Maya Teeple** (She/Her) | **Senior Planner**  
**Thurston County Community Planning & Economic Development**  
**Community Planning Division**  
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**From:** kenbonniemiller@gmail.com <kenbonniemiller@gmail.com>  
**Sent:** Sunday, May 28, 2023 7:12 PM  
**To:** Maya Teeple <maya.teeple@co.thurston.wa.us>  
**Cc:** Justin Becker <jaib7@msn.com>  
**Subject:** RE: Ag Zoning Update -

Maya:

These properties are already in Designated Forestland, which retains my zoning of 1 house/5 acres, none of which have good soils, even for timber that I'm still trying to grow.

1. What would happen to my development rights if rezoned to Ag?
2. Are you available to speak with other Thurston family forest owners if I can set up an early evening appointment?

Ken

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**From:** Maya Teeple <[maya.teeple@co.thurston.wa.us](mailto:maya.teeple@co.thurston.wa.us)>

**Sent:** Sunday, May 28, 2023 2:24 PM

**To:** [kenbonniemiller@gmail.com](mailto:kenbonniemiller@gmail.com)

**Subject:** RE: Ag Zoning Update -

Hi Ken and Bonnie,

Yes, some of the proposed options do include the property off of 12116 Scott Creek Lp. You should receive a postcard shortly, those were sent out on Friday. It looks like 2 parcels you own could be included: parcels 12733410000 and 12734320000.

Here is a summary of which options would rezone those properties to ag:

- Baseline, both parcels rezoned
- Option 1, neither rezoned
- Option 2, parcel 12734320000 rezoned

Comments will be accepted until noon on June 21 if you would like to comment directly to the Planning Commission on the proposed changes. Please let me know if you have any further questions.

Kindly,  
Maya



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**From:** [kenbonniemiller@gmail.com](mailto:kenbonniemiller@gmail.com) <[kenbonniemiller@gmail.com](mailto:kenbonniemiller@gmail.com)>

**Sent:** Friday, May 26, 2023 4:56 PM

**To:** Maya Teeple <[maya.teeple@co.thurston.wa.us](mailto:maya.teeple@co.thurston.wa.us)>

**Subject:** Ag Zoning Update -

We have 108 acres at 12116 Scott Creek Loop – now all on new approved Private Road system “Family Forest Ln. SW”.

I can’t decipher your planning maps to see if you are contemplating any kind of zoning change on our property. Please advise/clarify.

Ken & Bonnie Miller  
11834 Family Forest Ln SW  
Olympia, WA 98512

**From:** [KRIS KNUTZEN](#)  
**To:** [Maya Teeple](#)  
**Subject:** RE: Why is my property included in LTA scenario 2?  
**Date:** Wednesday, May 31, 2023 1:50:41 PM  
**Attachments:** [image001.png](#)

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Hi Maya,

Thank you for your prompt reply and explanation!

Please add the following comments to the record to be sent to the Planning Commission to be read:

Planning Commissioners,

My wife and I are the owners of 40 acres of land at the end of Wright Rd. parcel #12614440000. Our parcel along with a neighbors 15 acres to the east make up an isolated polygon that would be zoned LTA under scenario 2. This 55 acres has 100 year old trees on the neighbors 15 acres and 34 year old trees on ours. My wife and I recently purchased the 40 acres as a retirement investment with the goal of growing trees and delaying the development of the property, I am a retired forester. Changing the zoning from 1/5 to 1/20 would reduce the value of our property.

We currently have a three year class III forest practices application with the WA DNR allowing us to build roads and harvest trees. I am workin on a 15 year long term forest practices application to replace the three year permit. Clearing the land for an agricultural use would require a class IVG forest practices application from Thurston County. Critical area buffers of the wetlands and slopes on mine and the neighbors properties would reduce the area available for a conversion from forestry to agriculture to small isolated polygons far below the 40 acre threshold for inclusion in the proposed LTA scenario 2.

When we bought our property it had a second parcel #12614440100, six acres of the 40 that could be used for home sites, we had that parcel changed to designated forest land. Do we need to reestablish this parcel to avoid a regulatory taking of our property in a rezone?

It seems dishonest to rezone property for a use that would not be allowed under current critical area rules. Would we be compensated for the decrease in land value from the lower allowable housing density?

Thank you for your time,  
Kris Knutzen

On 05/31/2023 9:08 AM PDT Maya Teeple <[maya.teeple@co.thurston.wa.us](mailto:maya.teeple@co.thurston.wa.us)> wrote:

Hi Kris,

Thanks for your email. If you still have questions after reading this email, please let me know and I'll give you a call.

The county is considering zoning new land for long-term agriculture – we were appealed and need to look at new data. We worked with a stakeholder group to arrive at the maps you saw online. We are still early in the process so there are many opportunities to comment now and coming up, and maps might change

depending on the comment we get.

I took a look at your parcel, and yes, it is only included in Scenario 2. Here is a summary why:

- The County was appealed to look at new prime farmland soils (USDA data) to map prime farmland. Your property is mapped mostly (about 90% of it) with Alderwood Gravelly Sandy Loam 3-15%, which is a new prime farmland soil that Thurston County didn't include previously when zoning long-term agriculture lands.
- Our current policies that site these lands require that a clump of agricultural land of 200-320 acres be all together to be zoned as long-term agriculture. Scenario 2 drops that requirement down to 40 acres, and ultimately that's why your property is pulled in under scenario 2 and not the other 2 options (baseline and scenario 1).

Your property is currently zoned as RRR 1/5, so it could be developed at 1 house per 5 acres. If changed to Long-Term Agriculture, that drops to 1 house per 20 acres. A change in zoning would not impact your enrollment as designated forest land. The LTA zone also doesn't require you do agriculture; it is intended to protect land for current or future agricultural use.

Opportunities to comment:

- The public hearing on June 21 will be in person and also have a Zoom option. If you can't attend, you can submit a written comment **anytime from now until noon on June 21 by email to me**. I will include it on the record and it will be sent to our Planning Commission to read. I'd encourage you to write a letter if you can't attend in person.
- There will be one other hearing later this year with the Board of County Commissioners, a date for that is TBD. Same thing – we accept written comments, or people can speak to the Board in person.

Kindly,  
Maya

**Maya Teeple** (She/Her) | Senior Planner

Thurston County Community Planning & Economic Development



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**From:** KRIS KNUTZEN <k-knutzen@comcast.net>  
**Sent:** Wednesday, May 31, 2023 2:50 AM  
**To:** Maya Teeple <maya.teeple@co.thurston.wa.us>  
**Subject:** Why is my property included in LTA scenario 2?

Maya,

Just checked the map referred to in a card I received in the mail today. My designated forest land PN 12614440000 is included in LTA scenario 2 and I don't understand why? I am planning to be out of town on a vacation on June 21, will there be other opportunities for me to comment? Is there a way for me to submit a letter?

Please give me a call so I can try and understand what is being proposed and why.

Thank you,

Kris Knutzen

360-359-1949

**From:** [Ashley Arai](#)  
**To:** [Maya Teeple](#)  
**Subject:** FW: Ag Zoning update Yelm meeting 4/4/23  
**Date:** Tuesday, June 6, 2023 3:59:26 PM

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For the record

**Ashley Arai** | Agriculture Community Program Manager  
**Thurston County Community Planning & Economic Development**  
**Community Planning Division**  
3000 Pacific Ave SE, Olympia, Washington 98501  
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**From:** Ashley Arai  
**Sent:** Tuesday, June 6, 2023 12:55 PM  
**To:** Roland Gorgas <[astrofreak03@yahoo.com](mailto:astrofreak03@yahoo.com)>  
**Subject:** RE: Ag Zoning update Yelm meeting 4/4/23

Hello,

Thank you for your patience! Yes, all of the parcels you reference will remain in LTA zoning. The current scenarios only include expansion of LTA zoning, not any changes to existing LTA zoning. Please feel free to get in touch if you have any additional questions or concerns.

Kindest regards,

Ashley

**Ashley Arai** | Agriculture Community Program Manager  
**Thurston County Community Planning & Economic Development**  
**Community Planning Division**  
3000 Pacific Ave SE, Olympia, Washington 98501  
**Cell (Primary):** (360) 280-9298  
[Ashley.Arai@co.thurston.wa.us](mailto:Ashley.Arai@co.thurston.wa.us) | [www.thurstonplanning.org](http://www.thurstonplanning.org)

---

**From:** Roland Gorgas <[astrofreak03@yahoo.com](mailto:astrofreak03@yahoo.com)>  
**Sent:** Friday, June 2, 2023 2:27 PM  
**To:** Ashley Arai <[ashley.arai@co.thurston.wa.us](mailto:ashley.arai@co.thurston.wa.us)>  
**Subject:** RE: Ag Zoning update Yelm meeting 4/4/23

Thank you Ashley,  
Hope you find time to enjoy the sunny weekend with your family.  
Cindy

[Sent from Yahoo Mail on Android](#)

On Fri, Jun 2, 2023 at 12:58 PM, Ashley Arai <[ashley.arai@co.thurston.wa.us](mailto:ashley.arai@co.thurston.wa.us)> wrote:

So nice to hear from you Cindy! Just wanted to let you know I got your message and hope to get you an answer early next week. Thanks and have a great weekend!

- Ashley

**Ashley Arai** | Agriculture Community Program Manager

**Thurston County Community Planning & Economic Development**

**Community Planning Division**

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[Ashley.Arai@co.thurston.wa.us](mailto:Ashley.Arai@co.thurston.wa.us) | [www.thurstonplanning.org](http://www.thurstonplanning.org)

---

**From:** Roland Gorgas <[astrofreak03@yahoo.com](mailto:astrofreak03@yahoo.com)>

**Sent:** Thursday, June 1, 2023 10:50 AM

**To:** Ashley Arai <[ashley.arai@co.thurston.wa.us](mailto:ashley.arai@co.thurston.wa.us)>

**Subject:** Re: Ag Zoning update Yelm meeting 4/4/23

Hi Ashley,

Just checking to see if our parcels and neighbor parcel currently in Long Term Ag will remain in long term Ag. under the new proposed Changes to LTA. I understand there is more than one proposal, so my question is: Regardless of which proposal is selected for updated Long Term Ag. zoning will parcels 22609310000 and 22609310100 and 22609310200 remain in LTA zoning.

I am reading through the June 21st materials now. Lots of information to digest.

Thank You!

Cindy Gorgas

**From:** [Maya Teeple](#)  
**To:** [Robert and Marion McIntosh](#)  
**Cc:** [Ashley Arai](#)  
**Subject:** RE: June 21 long term ag. hearing  
**Date:** Thursday, June 15, 2023 11:36:00 AM  
**Attachments:** [image001.png](#)

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Hi Robert,

Sorry for the delay in getting back to you. Happy to help!

You can find an interactive map that shows the 3 options [online here](#). Once the map loads, the current LTA is shown in a lime green color, and the new options are shown in dark green. You can toggle the 3 new options on and off on the left sidebar.

Land used for timber, either as designated forest land or as non-designated forest land could be included in these options. These 3 options are developed using “prime farmland soils”, as classified by USDA. We know that there We ran the numbers and estimate that around 30% of each of these options include prime farmland soils that are forested in some capacity (some of that is designated forestland, some non-designated, and some non-commercial forest).

Please let me know if you have any further questions.

Kindly,

Maya



**Maya Teeple** (She/Her) | **Senior Planner**  
**Thurston County Community Planning & Economic Development**  
**Community Planning Division**  
3000 Pacific Ave SE, Olympia, Washington 98501  
**Cell (Primary):** (360) 545-2593  
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---

**From:** Robert and Marion McIntosh <robmarbc@aol.com>  
**Sent:** Sunday, June 11, 2023 6:56 PM  
**To:** Maya Teeple <maya.teeple@co.thurston.wa.us>  
**Subject:** June 21 long term ag. hearing

Maya,

I've been looking at the information about this hearing, and have two questions. First, is there a map showing the proposed additions to the current long term ag. zoning. And second, could land currently used for growing timber, either (a) designated as forest land for purposes of current use taxation or (b) not so designated, be included in the long term ag. designation?

Sorry to bother you with this, but in looking through the materials I couldn't find any reference to a map, or any indication of whether land currently used to grow timber could be included in the long term ag. classification.

Thanks,

Robert McIntosh

NIELSEN PACIFIC LTD.

June 16, 2023

**THURSTON COUNTY PLANNING COMMISSION**

3000 Pacific Avenue Southeast  
 Olympia, Washington 98501

Dear Thurston County Planning Commission Members:

We are providing comment to the proposed 2023 Agricultural Resource Lands (ARL) update.

Nielsen Pacific/Holroyd Company owns and operates two mines in Thurston County that have the potential to be affected by the 2023 ARL Update. The mines are located on the east side of Old Pacific Highway SE and south of Durgin Road SE. These mines are authorized by the Washington State Department of Natural Resources (DNR) as the Nisqually I (DNR Reclamation Permit Number 10002) and Nisqually II (DNR Reclamation Permit Number 12724) Gravel Mines. The Nisqually I and II mines are in an area Thurston County currently designates **solely** as Mineral Resource Lands (MRL). These mine locations are depicted on the Thurston County Comprehensive Plan Map N-2 Designated Mineral Resource Lands (attached) for your information. As part of the proposed 2023 ARL update, varying portions of the Nisqually I and II mines are being considered for co-designation as MRL and ARL.

The proposed 2023 update to the Thurston County Comprehensive Plan Chapter 3 Natural Resource Lands is proposing to the co-designation of Agricultural Resource Lands and Mineral Resource Lands.

I.

**MINING LANDS ARE NOT CLASSIFIED AS PRIME FARMLANDS  
 MRL AND ARL DESIGNATIONS THEREFORE ARE NOT COMPATIBLE WITH EACH OTHER  
 AND CANNOT BE LOGICALLY CO-DESIGNATED**

The Natural Resources Conservation Service (**NRCS**) **classifies mining lands** (in our case – gravel mines) **as “Pits, gravel.” Pits are** considered to be miscellaneous land areas and **not a soil component**. We contacted Max Ross, Soil Scientist – Soil Survey Project Leader, for the Thurston County Region, from the USDA - NRCS, Soil and Plant Division, in Olympia, Washington to ask if the NRCS classifies “Pits, gravel” as farmland. The NRCS Soil Scientist unequivocally stated that **“soils that are Pits, gravel are considered to be miscellaneous land areas and not a soil component, so by default they are not even eligible for a farmland classification. So, to directly answer your question, no, ‘pits’ are not prime farmland.”** (Emphasis Added.) (Attached hereto as Exhibit 1 is the Email response from the NRCS Soil Scientist, dated June 7, 2023, to our question whether mining lands are farmlands.

Based upon WAC 365-190-050 (3), "Lands should be considered for designation as agricultural resource lands based on three factors:

- (a) The land is not already characterized by urban growth.
- (b) The land is used or capable of being used for agricultural production.
- (c) The land has long-term commercial significance for agriculture.
  - (i) The classification of prime and unique farmland soils, and farmlands of statewide importance, as mapped by the Natural Resources Conservation Service..."

**All three factors must be present for a county to designate property as Agricultural Resource Land.** Based upon the land classification by the NRCS, the activity of mining necessarily precludes the designation of those lands as agricultural resource lands due to its intrinsic nature of not being a land suitable for "long-term commercial agriculture" as it is suitable for mining activities.

Although the Growth Management Act regulations, Washington Administrative Code (WAC) 365-190-040(1) allow the classification and designation of natural resource lands (agriculture, forestry and mineral extraction... allows for the overlapping of designated natural resource lands **only if the designations are compatible**. WAC 365-190-040(1)(b) provides:

"if two or more natural resource land designations apply, counties and cities must determine if these designations are incompatible. If they are incompatible, **counties and cities should examine the criteria to determine which use has the greatest long-term commercial significance, and that resource use should be assigned to the lands being designated.**"  
(Emphasis Added).

Clearly, mining lands, which are scientifically deemed to not be prime farmlands and are essential as a building block material for infrastructure (roads and utilities) critical to supporting essential public functions, are required under the Growth Management Act to be designated for its greatest long-term commercial significance as only Mineral Resource Lands.

## II.

### **Preclusion of Crushing, Screening, and Washing from MRL Lands Conflicts with the Designation of MRL Lands under the County's Comprehensive Plan and the Washington State Mining Act**

In the event that Planning Commission recommends the co-designation of ARL and MRL in the 2023 update to the County's Comprehensive Plan, the County must allow processing on all of the co-designated properties. Under the Update, new language is proposed that:

“Accessory uses to mining (crushing, screening, or washing) should only be located on adjacent mineral lands that are not co-designated with long-term agriculture.”

This language would eviscerate an allowed mining use in a MRL by segregating processing from the act of material removal. Processing is a customary aspect and a component of an allowed mining use. This proposed segregation of mining activities is in direct conflict with uses allowed by definition under Mineral Resource lands and the Washington State Mining Act.

From the Revised Code of Washington (RCW) 78.44, Surfacing Mining is defined to include all related operational activities. Specifically, 78.44.031(8) states that Mining “Operations” shall include all mine related activities, exclusive of reclamation...

Operations specifically include:

- (a) The mining or extraction of rock, stone, gravel, sand, earth, and other minerals;
- (b) Blasting, equipment maintenance, sorting, crushing, and loading;
- (c) On-site mineral processing including asphalt or concrete batching, concrete recycling, and other aggregate recycling;
- (d) Transporting minerals to and from the mine, on-site road maintenance, road maintenance for roads used exclusively for surface mining activities traffic safety, and traffic control.”

Under Thurston County Code (TCC) Chapter 20.30B Designated Mineral Lands, Section 20.30B.015 “1. ***Excavation and processing of minerals is allowed only on mineral resource lands (MRL) of long-term commercial significance designated in the comprehensive plan, or mining claims officially recognized by the state or federal government and recorded with the auditor...***”

Processing cannot be separated from extraction on properties designated Mineral Resource Lands regardless of other co-designations. Once property is designated as MRL, mining, including processing, by County Code and as consistent with the Mining Act, is deemed and treated as an allowable use.

The purpose of mining, and designation of Mineral Resource Lands, is to preserve those lands that are capable of producing merchantable minerals which is embedded in the GMA designation of MRL lands being those capable of providing long-term commercial significance. The Thurston County Comprehensive Plan recognizes the “mineral deposits should be conserved for long-term resource extraction.” Without processing, the material is classified as bank-run, which is considerably less valuable than a product meeting the gradation and quality

requirements of a Washington State Department of Transportation (WSDOT) specified material. Therefore, washing, crushing and screening, which are identified as components of mining under the Washington State Mining Act and Thurston County Code, preserve designated mineral resource lands for long-term commercial significance.

### III. CONCLUSION

In conclusion, based on the information contained in this letter and the attachments, our first request is that the Thurston County Planning Commission recommend to the Board of County Commissioners that MRL and ARL properties not be co-designated. The NRCS does not consider "Pits gravel" a soil component, so by default they are not eligible for farmland classification. The requirements for ARL designation under WAC 365-190-050 (3), (c), (i) are not met.

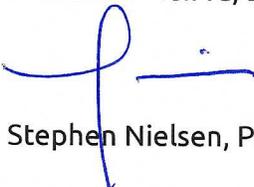
Because the Nisqually I and II Mines are actively being operated with large foot-prints, they should not be considered in a proposal that would preclude crushing, screening and washing as the NRCS treats these properties as Pits, gravel, "so by default they are not even eligible for a farmland classification. So, to directly answer your question, no, 'pits' are not prime farmland."

Our second request is, providing the Planning Commission is of the opinion that it is appropriate to co-designate MRL and ARL property, processing must be allowed on these co-designated lands.

Thank you for your thoughtful consideration of our requests which serve to protect lands suitable for long-term mining, as the Holroyd/Nielsen Pacific parcels which have been in operation for many years. The sole designation of Mineral Resource Lands as required under the Growth Management Act and contemplated under the Mining Act is appropriate.

Sincerely,

NIELSEN PACIFIC, LTD.

 6-16-23  
Stephen Nielsen, President

## Kathy Hargrave

---

**From:** Ross, Max - FPAC-NRCS, WA <max.ross@usda.gov>  
**Sent:** Wednesday, June 7, 2023 10:52 AM  
**To:** Kathy Hargrave  
**Cc:** Gutierrez, Erin - FPAC-NRCS, WA  
**Subject:** RE: [External Email]NRCS Soil Survey Map Information

Hi Kathy,

Thanks for providing the soils report and a bit of context. Soil surveys are a snapshot in time, so I'm guessing that at the time the Thurston County survey was published (1970's) the gravel mine was significantly smaller than it is today. These changes in land use can often cause some confusion because the soil survey lines/polygons will remain the same, but the air photo basemap that those lines are projected over get updated every couple years.

Soil survey data is updated and published at the project scale (typically a county or watershed within a county), so it is not really possible to update the mapping for such a small area. However, in your case it is obvious that the mine has expanded, so I would suggest that for all areas that are clearly part of the mine you use the 'Pits' classification for your project/reporting purposes. 'Pits' are considered to be a miscellaneous land area and not a soil component, so by default they are not even eligible for a farmland classification. So to directly answer your question, no, 'pits' are not prime farmland.

For all other soil components in your project area there is a farmland classification report in WSS. If you need assistance navigating to that report let me know. Feel free to reach out if you have any other questions too. Take care,

-Max

**Max Ross** (he/him)  
**Soil Scientist – Soil Survey Project Leader**  
**USDA – Natural Resources Conservation Service**  
**Soil and Plant Science Division**  
**Olympia, WA Soil Survey Office**  
**(360) 480-6578 (C)**

---

**From:** Kathy Hargrave <kathyh@sittshill.com>  
**Sent:** Wednesday, June 7, 2023 10:25 AM  
**To:** Ross, Max - FPAC-NRCS, WA <max.ross@usda.gov>  
**Cc:** Gutierrez, Erin - FPAC-NRCS, WA <Erin.Gutierrez@usda.gov>  
**Subject:** RE: [External Email]NRCS Soil Survey Map Information

Max,

I have attached the NRCS Soil data for the Holroyd Company Nisqually I and II Gravel Mines in Thurston County. The Soil classification lists Pits, gravel for only the northern-most portion of the mines, close to the intersection of Old Pacific Highway Southeast south of Durgin Road Southeast. I was wondering why the rest of the mine area was not classified as Pits, gravel as well.

My next question has to do with the designation of Farmland. Does NRCS consider gravel mines as farmland? If you look through the attached report, the majority of the soils, in the disturbed mining area, are considered Farmland of statewide importance, Prime farmland, or Prime farmland if irrigated; there is no determination of farmland for the Pits, gravel designation.

Thank you for your assistance with my comments and questions.

**Kathy A. Hargrave, P.E.**  
*Principal*



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EMAIL: [kathyh@sittshill.com](mailto:kathyh@sittshill.com)  
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---

**From:** Gutierrez, Erin - FPAC-NRCS, WA <Erin.Gutierrez@usda.gov>  
**Sent:** Wednesday, June 7, 2023 9:44 AM  
**To:** Kathy Hargrave <kathyh@sittshill.com>  
**Cc:** Ross, Max - FPAC-NRCS, WA <max.ross@usda.gov>  
**Subject:** RE: [External Email]NRCS Soil Survey Map Information

Hi Kathy,

Web Soil Survey data is not accurate at small scales and the information found should be ground-truthed to verify accuracy. I am not sure about NRCS's capacity to change classifications on the site; I have cc'd a soil scientist above that should be able to better answer your questions. Depending on what you are using the data for, our capacity to help interpret the information may be limited. Feel free to provide some context for Max so he can better assist you.

Thanks,

**Erin Gutierrez**  
*(They/Them)*

Soil Conservationist  
Olympia WA Field Office  
1835 Black Lake Blvd. SW Ste. E  
Olympia, WA 98512  
Phone: 360.704.7742  
Mobile: 360.393.2948



---

**From:** Kathy Hargrave <[kathyh@sittshill.com](mailto:kathyh@sittshill.com)>  
**Sent:** Tuesday, June 6, 2023 2:31 PM

To: Gutierrez, Erin - FPAC-NRCS, WA <[Erin.Gutierrez@usda.gov](mailto:Erin.Gutierrez@usda.gov)>

Subject: [External Email]NRCS Soil Survey Map Information

[External Email]

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Please send any concerns or suspicious messages to: [Spam.Abuse@usda.gov](mailto:Spam.Abuse@usda.gov)

Erin,

I printed a NRCS Soil Survey Report for the area on the east side of the Old Pacific Highway Southeast south of Durgin Road Southeast in unincorporated Thurston County, Washington. The area I was looking at is a gravel mine, please see the attached report. Only the northern-most portion of the site is labeled as "Pits, gravel." I am wondering why the rest of the mine is not labeled as "Pits, gravel." Is there a way to get this area reclassified as Pits, gravel?

Also, I would like to know if the USDA considers Gravel Pits as "Prime Farmland."

Thank you for your assistance with these questions.

Sincerely,

**Kathy A. Hargrave, P.E.**

*Principal*



**SITTS & HILL ENGINEERS, INC.**

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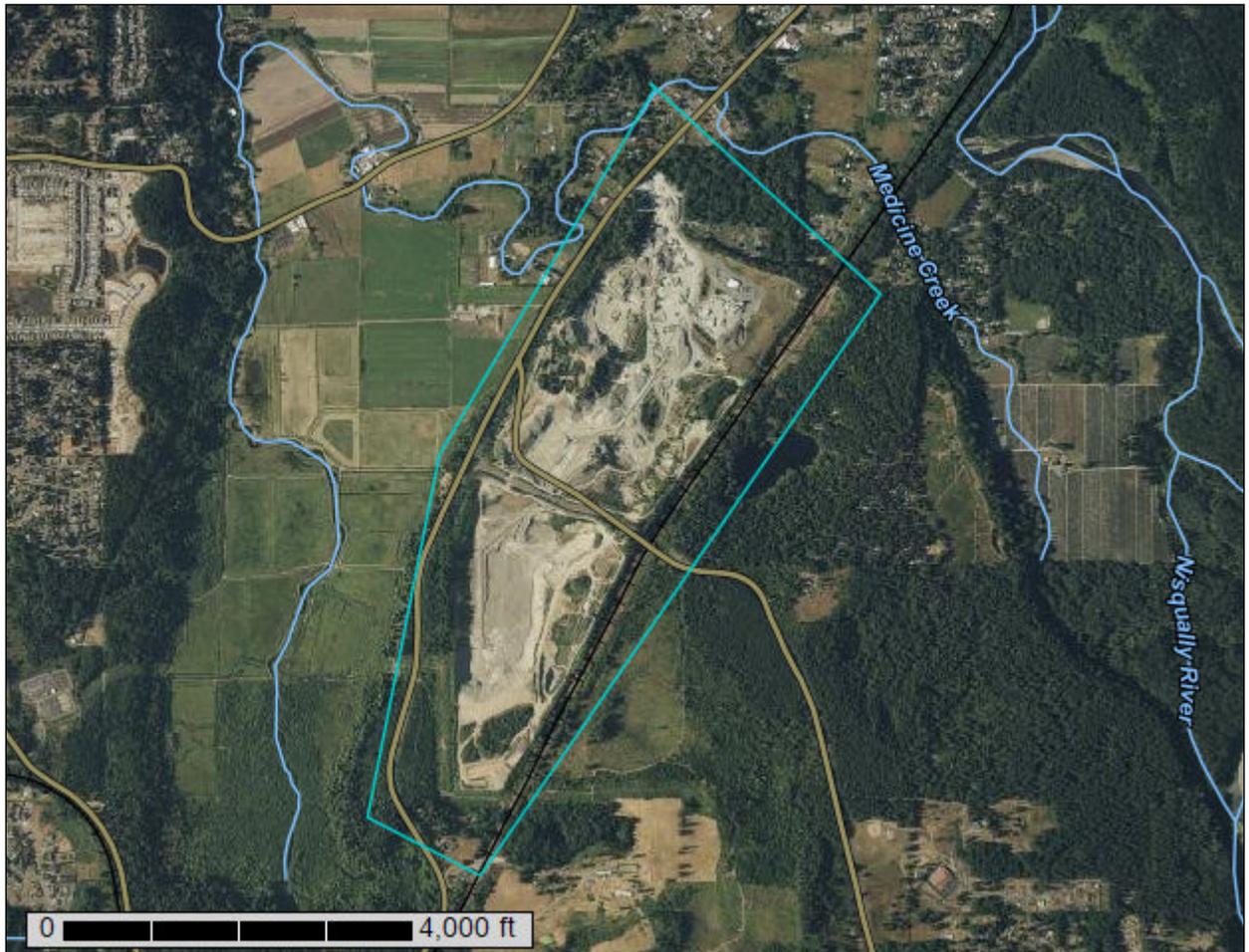
United States  
Department of  
Agriculture

**NRCS**

Natural  
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Conservation  
Service

A product of the National  
Cooperative Soil Survey,  
a joint effort of the United  
States Department of  
Agriculture and other  
Federal agencies, State  
agencies including the  
Agricultural Experiment  
Stations, and local  
participants

# Custom Soil Resource Report for Thurston County Area, Washington



# Preface

---

Soil surveys contain information that affects land use planning in survey areas. They highlight soil limitations that affect various land uses and provide information about the properties of the soils in the survey areas. Soil surveys are designed for many different users, including farmers, ranchers, foresters, agronomists, urban planners, community officials, engineers, developers, builders, and home buyers. Also, conservationists, teachers, students, and specialists in recreation, waste disposal, and pollution control can use the surveys to help them understand, protect, or enhance the environment.

Various land use regulations of Federal, State, and local governments may impose special restrictions on land use or land treatment. Soil surveys identify soil properties that are used in making various land use or land treatment decisions. The information is intended to help the land users identify and reduce the effects of soil limitations on various land uses. The landowner or user is responsible for identifying and complying with existing laws and regulations.

Although soil survey information can be used for general farm, local, and wider area planning, onsite investigation is needed to supplement this information in some cases. Examples include soil quality assessments (<http://www.nrcs.usda.gov/wps/portal/nrcs/main/soils/health/>) and certain conservation and engineering applications. For more detailed information, contact your local USDA Service Center (<https://offices.sc.egov.usda.gov/locator/app?agency=nrcs>) or your NRCS State Soil Scientist ([http://www.nrcs.usda.gov/wps/portal/nrcs/detail/soils/contactus/?cid=nrcs142p2\\_053951](http://www.nrcs.usda.gov/wps/portal/nrcs/detail/soils/contactus/?cid=nrcs142p2_053951)).

Great differences in soil properties can occur within short distances. Some soils are seasonally wet or subject to flooding. Some are too unstable to be used as a foundation for buildings or roads. Clayey or wet soils are poorly suited to use as septic tank absorption fields. A high water table makes a soil poorly suited to basements or underground installations.

The National Cooperative Soil Survey is a joint effort of the United States Department of Agriculture and other Federal agencies, State agencies including the Agricultural Experiment Stations, and local agencies. The Natural Resources Conservation Service (NRCS) has leadership for the Federal part of the National Cooperative Soil Survey.

Information about soils is updated periodically. Updated information is available through the NRCS Web Soil Survey, the site for official soil survey information.

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# How Soil Surveys Are Made

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Soil surveys are made to provide information about the soils and miscellaneous areas in a specific area. They include a description of the soils and miscellaneous areas and their location on the landscape and tables that show soil properties and limitations affecting various uses. Soil scientists observed the steepness, length, and shape of the slopes; the general pattern of drainage; the kinds of crops and native plants; and the kinds of bedrock. They observed and described many soil profiles. A soil profile is the sequence of natural layers, or horizons, in a soil. The profile extends from the surface down into the unconsolidated material in which the soil formed or from the surface down to bedrock. The unconsolidated material is devoid of roots and other living organisms and has not been changed by other biological activity.

Currently, soils are mapped according to the boundaries of major land resource areas (MLRAs). MLRAs are geographically associated land resource units that share common characteristics related to physiography, geology, climate, water resources, soils, biological resources, and land uses (USDA, 2006). Soil survey areas typically consist of parts of one or more MLRA.

The soils and miscellaneous areas in a survey area occur in an orderly pattern that is related to the geology, landforms, relief, climate, and natural vegetation of the area. Each kind of soil and miscellaneous area is associated with a particular kind of landform or with a segment of the landform. By observing the soils and miscellaneous areas in the survey area and relating their position to specific segments of the landform, a soil scientist develops a concept, or model, of how they were formed. Thus, during mapping, this model enables the soil scientist to predict with a considerable degree of accuracy the kind of soil or miscellaneous area at a specific location on the landscape.

Commonly, individual soils on the landscape merge into one another as their characteristics gradually change. To construct an accurate soil map, however, soil scientists must determine the boundaries between the soils. They can observe only a limited number of soil profiles. Nevertheless, these observations, supplemented by an understanding of the soil-vegetation-landscape relationship, are sufficient to verify predictions of the kinds of soil in an area and to determine the boundaries.

Soil scientists recorded the characteristics of the soil profiles that they studied. They noted soil color, texture, size and shape of soil aggregates, kind and amount of rock fragments, distribution of plant roots, reaction, and other features that enable them to identify soils. After describing the soils in the survey area and determining their properties, the soil scientists assigned the soils to taxonomic classes (units). Taxonomic classes are concepts. Each taxonomic class has a set of soil characteristics with precisely defined limits. The classes are used as a basis for comparison to classify soils systematically. Soil taxonomy, the system of taxonomic classification used in the United States, is based mainly on the kind and character of soil properties and the arrangement of horizons within the profile. After the soil

## Custom Soil Resource Report

scientists classified and named the soils in the survey area, they compared the individual soils with similar soils in the same taxonomic class in other areas so that they could confirm data and assemble additional data based on experience and research.

The objective of soil mapping is not to delineate pure map unit components; the objective is to separate the landscape into landforms or landform segments that have similar use and management requirements. Each map unit is defined by a unique combination of soil components and/or miscellaneous areas in predictable proportions. Some components may be highly contrasting to the other components of the map unit. The presence of minor components in a map unit in no way diminishes the usefulness or accuracy of the data. The delineation of such landforms and landform segments on the map provides sufficient information for the development of resource plans. If intensive use of small areas is planned, onsite investigation is needed to define and locate the soils and miscellaneous areas.

Soil scientists make many field observations in the process of producing a soil map. The frequency of observation is dependent upon several factors, including scale of mapping, intensity of mapping, design of map units, complexity of the landscape, and experience of the soil scientist. Observations are made to test and refine the soil-landscape model and predictions and to verify the classification of the soils at specific locations. Once the soil-landscape model is refined, a significantly smaller number of measurements of individual soil properties are made and recorded. These measurements may include field measurements, such as those for color, depth to bedrock, and texture, and laboratory measurements, such as those for content of sand, silt, clay, salt, and other components. Properties of each soil typically vary from one point to another across the landscape.

Observations for map unit components are aggregated to develop ranges of characteristics for the components. The aggregated values are presented. Direct measurements do not exist for every property presented for every map unit component. Values for some properties are estimated from combinations of other properties.

While a soil survey is in progress, samples of some of the soils in the area generally are collected for laboratory analyses and for engineering tests. Soil scientists interpret the data from these analyses and tests as well as the field-observed characteristics and the soil properties to determine the expected behavior of the soils under different uses. Interpretations for all of the soils are field tested through observation of the soils in different uses and under different levels of management. Some interpretations are modified to fit local conditions, and some new interpretations are developed to meet local needs. Data are assembled from other sources, such as research information, production records, and field experience of specialists. For example, data on crop yields under defined levels of management are assembled from farm records and from field or plot experiments on the same kinds of soil.

Predictions about soil behavior are based not only on soil properties but also on such variables as climate and biological activity. Soil conditions are predictable over long periods of time, but they are not predictable from year to year. For example, soil scientists can predict with a fairly high degree of accuracy that a given soil will have a high water table within certain depths in most years, but they cannot predict that a high water table will always be at a specific level in the soil on a specific date.

After soil scientists located and identified the significant natural bodies of soil in the survey area, they drew the boundaries of these bodies on aerial photographs and

## Custom Soil Resource Report

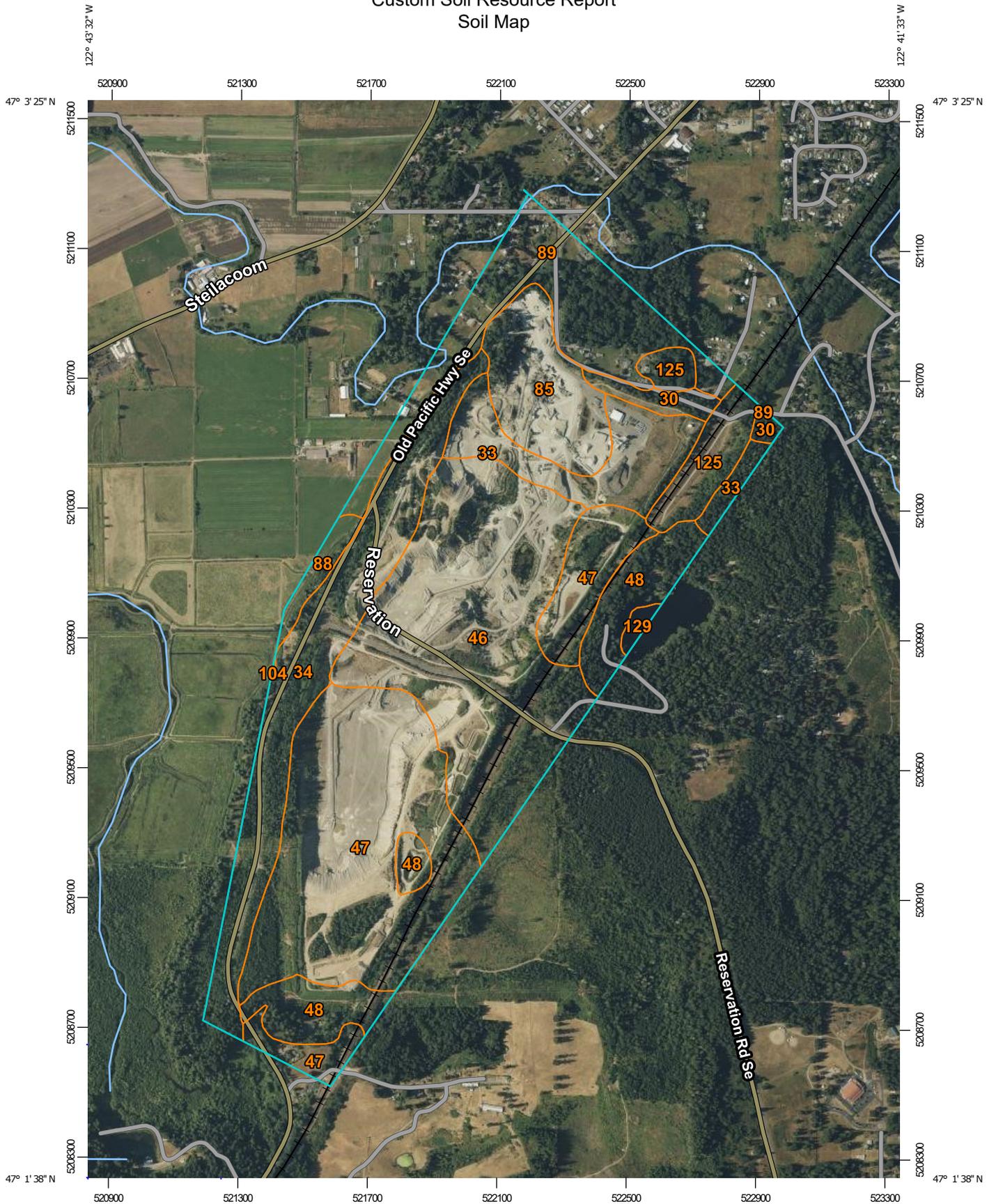
identified each as a specific map unit. Aerial photographs show trees, buildings, fields, roads, and rivers, all of which help in locating boundaries accurately.

# Soil Map

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The soil map section includes the soil map for the defined area of interest, a list of soil map units on the map and extent of each map unit, and cartographic symbols displayed on the map. Also presented are various metadata about data used to produce the map, and a description of each soil map unit.

# Custom Soil Resource Report Soil Map



Map Scale: 1:16,200 if printed on A portrait (8.5" x 11") sheet.



Map projection: Web Mercator Corner coordinates: WGS84 Edge tics: UTM Zone 10N WGS84



### MAP LEGEND

**Area of Interest (AOI)**

 Area of Interest (AOI)

**Soils**

 Soil Map Unit Polygons

 Soil Map Unit Lines

 Soil Map Unit Points

**Special Point Features**

-  Blowout
-  Borrow Pit
-  Clay Spot
-  Closed Depression
-  Gravel Pit
-  Gravelly Spot
-  Landfill
-  Lava Flow
-  Marsh or swamp
-  Mine or Quarry
-  Miscellaneous Water
-  Perennial Water
-  Rock Outcrop
-  Saline Spot
-  Sandy Spot
-  Severely Eroded Spot
-  Sinkhole
-  Slide or Slip
-  Sodic Spot

-  Spoil Area
-  Stony Spot
-  Very Stony Spot
-  Wet Spot
-  Other
-  Special Line Features

**Water Features**

 Streams and Canals

**Transportation**

-  Rails
-  Interstate Highways
-  US Routes
-  Major Roads
-  Local Roads

**Background**

 Aerial Photography

### MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:24,000.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service  
 Web Soil Survey URL:  
 Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Thurston County Area, Washington  
 Survey Area Data: Version 16, Sep 8, 2022

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Jul 31, 2022—Aug 8, 2022

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

## Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
30	Dystric Xerochrepts, 60 to 90 percent slopes	8.2	1.5%
33	Everett very gravelly sandy loam, 8 to 15 percent slopes	38.1	6.9%
34	Everett very gravelly sandy loam, 15 to 30 percent slopes	70.4	12.8%
46	Indianola loamy sand, 0 to 5 percent slopes	131.7	23.9%
47	Indianola loamy sand, 5 to 15 percent slopes	142.6	25.9%
48	Indianola loamy sand, 15 to 30 percent slopes	39.8	7.2%
85	Pits, gravel	35.2	6.4%
88	Puget silt loam	6.2	1.1%
89	Puyallup silt loam	56.5	10.2%
104	Semiahmoo muck	0.1	0.0%
125	Xerorthents, 0 to 5 percent slopes	20.6	3.7%
129	Water	2.1	0.4%
<b>Totals for Area of Interest</b>		<b>551.4</b>	<b>100.0%</b>

## Map Unit Descriptions

The map units delineated on the detailed soil maps in a soil survey represent the soils or miscellaneous areas in the survey area. The map unit descriptions, along with the maps, can be used to determine the composition and properties of a unit.

A map unit delineation on a soil map represents an area dominated by one or more major kinds of soil or miscellaneous areas. A map unit is identified and named according to the taxonomic classification of the dominant soils. Within a taxonomic class there are precisely defined limits for the properties of the soils. On the landscape, however, the soils are natural phenomena, and they have the characteristic variability of all natural phenomena. Thus, the range of some observed properties may extend beyond the limits defined for a taxonomic class. Areas of soils of a single taxonomic class rarely, if ever, can be mapped without including areas of other taxonomic classes. Consequently, every map unit is made up of the soils or miscellaneous areas for which it is named and some minor components that belong to taxonomic classes other than those of the major soils.

Most minor soils have properties similar to those of the dominant soil or soils in the map unit, and thus they do not affect use and management. These are called noncontrasting, or similar, components. They may or may not be mentioned in a particular map unit description. Other minor components, however, have properties

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and behavioral characteristics divergent enough to affect use or to require different management. These are called contrasting, or dissimilar, components. They generally are in small areas and could not be mapped separately because of the scale used. Some small areas of strongly contrasting soils or miscellaneous areas are identified by a special symbol on the maps. If included in the database for a given area, the contrasting minor components are identified in the map unit descriptions along with some characteristics of each. A few areas of minor components may not have been observed, and consequently they are not mentioned in the descriptions, especially where the pattern was so complex that it was impractical to make enough observations to identify all the soils and miscellaneous areas on the landscape.

The presence of minor components in a map unit in no way diminishes the usefulness or accuracy of the data. The objective of mapping is not to delineate pure taxonomic classes but rather to separate the landscape into landforms or landform segments that have similar use and management requirements. The delineation of such segments on the map provides sufficient information for the development of resource plans. If intensive use of small areas is planned, however, onsite investigation is needed to define and locate the soils and miscellaneous areas.

An identifying symbol precedes the map unit name in the map unit descriptions. Each description includes general facts about the unit and gives important soil properties and qualities.

Soils that have profiles that are almost alike make up a *soil series*. Except for differences in texture of the surface layer, all the soils of a series have major horizons that are similar in composition, thickness, and arrangement.

Soils of one series can differ in texture of the surface layer, slope, stoniness, salinity, degree of erosion, and other characteristics that affect their use. On the basis of such differences, a soil series is divided into *soil phases*. Most of the areas shown on the detailed soil maps are phases of soil series. The name of a soil phase commonly indicates a feature that affects use or management. For example, Alpha silt loam, 0 to 2 percent slopes, is a phase of the Alpha series.

Some map units are made up of two or more major soils or miscellaneous areas. These map units are complexes, associations, or undifferentiated groups.

A *complex* consists of two or more soils or miscellaneous areas in such an intricate pattern or in such small areas that they cannot be shown separately on the maps. The pattern and proportion of the soils or miscellaneous areas are somewhat similar in all areas. Alpha-Beta complex, 0 to 6 percent slopes, is an example.

An *association* is made up of two or more geographically associated soils or miscellaneous areas that are shown as one unit on the maps. Because of present or anticipated uses of the map units in the survey area, it was not considered practical or necessary to map the soils or miscellaneous areas separately. The pattern and relative proportion of the soils or miscellaneous areas are somewhat similar. Alpha-Beta association, 0 to 2 percent slopes, is an example.

An *undifferentiated group* is made up of two or more soils or miscellaneous areas that could be mapped individually but are mapped as one unit because similar interpretations can be made for use and management. The pattern and proportion of the soils or miscellaneous areas in a mapped area are not uniform. An area can be made up of only one of the major soils or miscellaneous areas, or it can be made up of all of them. Alpha and Beta soils, 0 to 2 percent slopes, is an example.

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Some surveys include *miscellaneous areas*. Such areas have little or no soil material and support little or no vegetation. Rock outcrop is an example.

## Thurston County Area, Washington

### 30—Dystric Xerochrepts, 60 to 90 percent slopes

#### Map Unit Setting

*National map unit symbol:* 2nd8r  
*Elevation:* 0 to 3,280 feet  
*Mean annual precipitation:* 50 inches  
*Mean annual air temperature:* 50 degrees F  
*Frost-free period:* 180 days  
*Farmland classification:* Not prime farmland

#### Map Unit Composition

*Dystric xerochrepts and similar soils:* 85 percent  
*Minor components:* 5 percent  
*Estimates are based on observations, descriptions, and transects of the mapunit.*

#### Description of Dystric Xerochrepts

##### Setting

*Landform:* Escarpments  
*Parent material:* Colluvium and glacial till

##### Typical profile

*H1 - 0 to 4 inches:* very gravelly sandy loam  
*H2 - 4 to 30 inches:* very gravelly sandy loam  
*H3 - 30 to 34 inches:* very gravelly sandy loam

##### Properties and qualities

*Slope:* 60 to 90 percent  
*Depth to restrictive feature:* 20 to 72 inches to densic material  
*Drainage class:* Well drained  
*Capacity of the most limiting layer to transmit water (Ksat):* Very low to moderately low (0.00 to 0.06 in/hr)  
*Depth to water table:* More than 80 inches  
*Frequency of flooding:* None  
*Frequency of ponding:* None  
*Available water supply, 0 to 60 inches:* Very low (about 2.1 inches)

##### Interpretive groups

*Land capability classification (irrigated):* None specified  
*Land capability classification (nonirrigated):* 7e  
*Hydrologic Soil Group:* C  
*Hydric soil rating:* No

#### Minor Components

##### Skipopa

*Percent of map unit:* 5 percent  
*Hydric soil rating:* No

### 33—Everett very gravelly sandy loam, 8 to 15 percent slopes

#### Map Unit Setting

*National map unit symbol:* 2t62b

*Elevation:* 30 to 900 feet

*Mean annual precipitation:* 35 to 91 inches

*Mean annual air temperature:* 48 to 52 degrees F

*Frost-free period:* 180 to 240 days

*Farmland classification:* Farmland of statewide importance

#### Map Unit Composition

*Everett and similar soils:* 80 percent

*Minor components:* 20 percent

*Estimates are based on observations, descriptions, and transects of the mapunit.*

#### Description of Everett

##### Setting

*Landform:* Moraines, eskers, kames

*Landform position (two-dimensional):* Shoulder, footslope

*Landform position (three-dimensional):* Crest, base slope

*Down-slope shape:* Convex

*Across-slope shape:* Convex

*Parent material:* Sandy and gravelly glacial outwash

##### Typical profile

*O<sub>i</sub> - 0 to 1 inches:* slightly decomposed plant material

*A - 1 to 3 inches:* very gravelly sandy loam

*B<sub>w</sub> - 3 to 24 inches:* very gravelly sandy loam

*C<sub>1</sub> - 24 to 35 inches:* very gravelly loamy sand

*C<sub>2</sub> - 35 to 60 inches:* extremely cobbly coarse sand

##### Properties and qualities

*Slope:* 8 to 15 percent

*Depth to restrictive feature:* More than 80 inches

*Drainage class:* Somewhat excessively drained

*Capacity of the most limiting layer to transmit water (K<sub>sat</sub>):* High (1.98 to 5.95 in/hr)

*Depth to water table:* More than 80 inches

*Frequency of flooding:* None

*Frequency of ponding:* None

*Available water supply, 0 to 60 inches:* Low (about 3.2 inches)

##### Interpretive groups

*Land capability classification (irrigated):* None specified

*Land capability classification (nonirrigated):* 4s

*Hydrologic Soil Group:* A

*Ecological site:* F002XA004WA - Puget Lowlands Forest

*Forage suitability group:* Droughty Soils (G002XN402WA), Droughty Soils (G002XS401WA), Droughty Soils (G002XF403WA)

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*Other vegetative classification:* Droughty Soils (G002XN402WA), Droughty Soils (G002XS401WA), Droughty Soils (G002XF403WA)  
*Hydric soil rating:* No

### Minor Components

#### Alderwood

*Percent of map unit:* 10 percent  
*Landform:* Hills, ridges  
*Landform position (two-dimensional):* Shoulder  
*Landform position (three-dimensional):* Nose slope, talus  
*Down-slope shape:* Convex, linear  
*Across-slope shape:* Convex  
*Hydric soil rating:* No

#### Indianola

*Percent of map unit:* 10 percent  
*Landform:* Terraces, kames, eskers  
*Landform position (three-dimensional):* Riser  
*Down-slope shape:* Linear  
*Across-slope shape:* Linear  
*Hydric soil rating:* No

## 34—Everett very gravelly sandy loam, 15 to 30 percent slopes

### Map Unit Setting

*National map unit symbol:* 2t62c  
*Elevation:* 30 to 900 feet  
*Mean annual precipitation:* 35 to 91 inches  
*Mean annual air temperature:* 48 to 52 degrees F  
*Frost-free period:* 180 to 240 days  
*Farmland classification:* Farmland of statewide importance

### Map Unit Composition

*Everett and similar soils:* 80 percent  
*Minor components:* 20 percent  
*Estimates are based on observations, descriptions, and transects of the mapunit.*

### Description of Everett

#### Setting

*Landform:* Moraines, eskers, kames  
*Landform position (two-dimensional):* Backslope  
*Landform position (three-dimensional):* Side slope  
*Down-slope shape:* Convex  
*Across-slope shape:* Convex  
*Parent material:* Sandy and gravelly glacial outwash

#### Typical profile

*O<sub>i</sub> - 0 to 1 inches:* slightly decomposed plant material  
*A - 1 to 3 inches:* very gravelly sandy loam

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*Bw - 3 to 24 inches:* very gravelly sandy loam  
*C1 - 24 to 35 inches:* very gravelly loamy sand  
*C2 - 35 to 60 inches:* extremely cobbly coarse sand

### Properties and qualities

*Slope:* 15 to 30 percent  
*Depth to restrictive feature:* More than 80 inches  
*Drainage class:* Somewhat excessively drained  
*Capacity of the most limiting layer to transmit water (Ksat):* High (1.98 to 5.95 in/hr)  
*Depth to water table:* More than 80 inches  
*Frequency of flooding:* None  
*Frequency of ponding:* None  
*Available water supply, 0 to 60 inches:* Low (about 3.2 inches)

### Interpretive groups

*Land capability classification (irrigated):* None specified  
*Land capability classification (nonirrigated):* 4e  
*Hydrologic Soil Group:* A  
*Ecological site:* F002XA004WA - Puget Lowlands Forest  
*Forage suitability group:* Droughty Soils (G002XN402WA), Droughty Soils (G002XS401WA)  
*Other vegetative classification:* Droughty Soils (G002XN402WA), Droughty Soils (G002XS401WA)  
*Hydric soil rating:* No

### Minor Components

#### Indianola

*Percent of map unit:* 10 percent  
*Landform:* Terraces, kames, eskers  
*Landform position (two-dimensional):* Backslope  
*Landform position (three-dimensional):* Side slope  
*Down-slope shape:* Linear  
*Across-slope shape:* Linear  
*Hydric soil rating:* No

#### Alderwood

*Percent of map unit:* 10 percent  
*Landform:* Hills, ridges  
*Landform position (two-dimensional):* Backslope  
*Landform position (three-dimensional):* Nose slope, side slope, talf  
*Down-slope shape:* Convex, linear  
*Across-slope shape:* Convex  
*Hydric soil rating:* No

## 46—Indianola loamy sand, 0 to 5 percent slopes

### Map Unit Setting

*National map unit symbol:* 2t62k  
*Elevation:* 0 to 980 feet

## Custom Soil Resource Report

*Mean annual precipitation:* 30 to 81 inches  
*Mean annual air temperature:* 48 to 50 degrees F  
*Frost-free period:* 170 to 210 days  
*Farmland classification:* Prime farmland if irrigated

### Map Unit Composition

*Indianola and similar soils:* 85 percent  
*Minor components:* 15 percent  
*Estimates are based on observations, descriptions, and transects of the mapunit.*

### Description of Indianola

#### Setting

*Landform:* Kames, terraces, eskers  
*Landform position (three-dimensional):* Tread  
*Down-slope shape:* Linear  
*Across-slope shape:* Linear  
*Parent material:* Sandy glacial outwash

#### Typical profile

*O<sub>i</sub> - 0 to 1 inches:* slightly decomposed plant material  
*A - 1 to 6 inches:* loamy sand  
*Bw<sub>1</sub> - 6 to 17 inches:* loamy sand  
*Bw<sub>2</sub> - 17 to 27 inches:* sand  
*BC - 27 to 37 inches:* sand  
*C - 37 to 60 inches:* sand

#### Properties and qualities

*Slope:* 0 to 5 percent  
*Depth to restrictive feature:* More than 80 inches  
*Drainage class:* Somewhat excessively drained  
*Capacity of the most limiting layer to transmit water (Ksat):* High to very high (5.95 to 99.90 in/hr)  
*Depth to water table:* More than 80 inches  
*Frequency of flooding:* None  
*Frequency of ponding:* None  
*Available water supply, 0 to 60 inches:* Low (about 3.9 inches)

#### Interpretive groups

*Land capability classification (irrigated):* 4s  
*Land capability classification (nonirrigated):* 4s  
*Hydrologic Soil Group:* A  
*Ecological site:* F002XA004WA - Puget Lowlands Forest  
*Forage suitability group:* Droughty Soils (G002XV402WA), Droughty Soils (G002XF403WA), Droughty Soils (G002XS401WA), Droughty Soils (G002XN402WA)  
*Other vegetative classification:* Droughty Soils (G002XV402WA), Droughty Soils (G002XF403WA), Droughty Soils (G002XS401WA), Droughty Soils (G002XN402WA)  
*Hydric soil rating:* No

### Minor Components

#### Alderwood

*Percent of map unit:* 5 percent  
*Landform:* Ridges, hills  
*Landform position (two-dimensional):* Summit

## Custom Soil Resource Report

*Landform position (three-dimensional):* Crest, talf  
*Down-slope shape:* Linear, convex  
*Across-slope shape:* Convex  
*Hydric soil rating:* No

### Everett

*Percent of map unit:* 5 percent  
*Landform:* Eskers, moraines, kames  
*Landform position (two-dimensional):* Summit, shoulder  
*Landform position (three-dimensional):* Interfluve, crest  
*Down-slope shape:* Convex  
*Across-slope shape:* Convex  
*Hydric soil rating:* No

### Norma

*Percent of map unit:* 5 percent  
*Landform:* Depressions, drainageways  
*Landform position (three-dimensional):* Dip  
*Down-slope shape:* Concave, linear  
*Across-slope shape:* Concave  
*Hydric soil rating:* Yes

## 47—Indianola loamy sand, 5 to 15 percent slopes

### Map Unit Setting

*National map unit symbol:* 2t635  
*Elevation:* 0 to 980 feet  
*Mean annual precipitation:* 30 to 81 inches  
*Mean annual air temperature:* 48 to 50 degrees F  
*Frost-free period:* 170 to 210 days  
*Farmland classification:* Prime farmland if irrigated

### Map Unit Composition

*Indianola and similar soils:* 85 percent  
*Minor components:* 15 percent  
*Estimates are based on observations, descriptions, and transects of the mapunit.*

### Description of Indianola

#### Setting

*Landform:* Terraces, kames, eskers  
*Landform position (three-dimensional):* Riser  
*Down-slope shape:* Linear  
*Across-slope shape:* Linear  
*Parent material:* Sandy glacial outwash

#### Typical profile

*Oi - 0 to 1 inches:* slightly decomposed plant material  
*A - 1 to 6 inches:* loamy sand  
*Bw1 - 6 to 17 inches:* loamy sand  
*Bw2 - 17 to 27 inches:* sand

## Custom Soil Resource Report

*BC - 27 to 37 inches: sand*

*C - 37 to 60 inches: sand*

### Properties and qualities

*Slope: 5 to 15 percent*

*Depth to restrictive feature: More than 80 inches*

*Drainage class: Somewhat excessively drained*

*Capacity of the most limiting layer to transmit water (Ksat): High to very high (5.95 to 99.90 in/hr)*

*Depth to water table: More than 80 inches*

*Frequency of flooding: None*

*Frequency of ponding: None*

*Available water supply, 0 to 60 inches: Low (about 3.9 inches)*

### Interpretive groups

*Land capability classification (irrigated): 4e*

*Land capability classification (nonirrigated): 4s*

*Hydrologic Soil Group: A*

*Ecological site: F002XA004WA - Puget Lowlands Forest*

*Forage suitability group: Droughty Soils (G002XN402WA), Droughty Soils (G002XS401WA)*

*Other vegetative classification: Droughty Soils (G002XN402WA), Droughty Soils (G002XS401WA)*

*Hydric soil rating: No*

### Minor Components

#### Alderwood

*Percent of map unit: 8 percent*

*Landform: Hills, ridges*

*Landform position (two-dimensional): Shoulder*

*Landform position (three-dimensional): Nose slope, tal*

*Down-slope shape: Convex, linear*

*Across-slope shape: Convex*

*Hydric soil rating: No*

#### Everett

*Percent of map unit: 5 percent*

*Landform: Moraines, eskers, kames*

*Landform position (two-dimensional): Shoulder, footslope*

*Landform position (three-dimensional): Base slope, crest*

*Down-slope shape: Convex*

*Across-slope shape: Convex*

*Hydric soil rating: No*

#### Norma

*Percent of map unit: 2 percent*

*Landform: Drainageways, depressions*

*Landform position (three-dimensional): Dip*

*Down-slope shape: Linear, concave*

*Across-slope shape: Concave*

*Hydric soil rating: Yes*

## 48—Indianola loamy sand, 15 to 30 percent slopes

### Map Unit Setting

*National map unit symbol:* 2t639

*Elevation:* 0 to 980 feet

*Mean annual precipitation:* 30 to 81 inches

*Mean annual air temperature:* 48 to 50 degrees F

*Frost-free period:* 170 to 210 days

*Farmland classification:* Farmland of statewide importance

### Map Unit Composition

*Indianola and similar soils:* 85 percent

*Minor components:* 15 percent

*Estimates are based on observations, descriptions, and transects of the mapunit.*

### Description of Indianola

#### Setting

*Landform:* Terraces, kames, eskers

*Landform position (two-dimensional):* Backslope

*Landform position (three-dimensional):* Side slope

*Down-slope shape:* Linear

*Across-slope shape:* Linear

*Parent material:* Sandy glacial outwash

#### Typical profile

*O<sub>i</sub> - 0 to 1 inches:* slightly decomposed plant material

*A - 1 to 6 inches:* loamy sand

*Bw<sub>1</sub> - 6 to 17 inches:* loamy sand

*Bw<sub>2</sub> - 17 to 27 inches:* sand

*BC - 27 to 37 inches:* sand

*C - 37 to 60 inches:* sand

#### Properties and qualities

*Slope:* 15 to 30 percent

*Depth to restrictive feature:* More than 80 inches

*Drainage class:* Somewhat excessively drained

*Capacity of the most limiting layer to transmit water (K<sub>sat</sub>):* High to very high (5.95 to 99.90 in/hr)

*Depth to water table:* More than 80 inches

*Frequency of flooding:* None

*Frequency of ponding:* None

*Available water supply, 0 to 60 inches:* Low (about 3.9 inches)

#### Interpretive groups

*Land capability classification (irrigated):* 6e

*Land capability classification (nonirrigated):* 4e

*Hydrologic Soil Group:* A

*Ecological site:* F002XA004WA - Puget Lowlands Forest

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*Forage suitability group:* Droughty Soils (G002XN402WA), Droughty Soils (G002XS401WA)

*Other vegetative classification:* Droughty Soils (G002XN402WA), Droughty Soils (G002XS401WA)

*Hydric soil rating:* No

### Minor Components

#### Alderwood

*Percent of map unit:* 8 percent

*Landform:* Hills, ridges

*Landform position (two-dimensional):* Backslope

*Landform position (three-dimensional):* Nose slope, side slope, talf

*Down-slope shape:* Convex, linear

*Across-slope shape:* Convex

*Hydric soil rating:* No

#### Everett

*Percent of map unit:* 5 percent

*Landform:* Moraines, eskers, kames

*Landform position (two-dimensional):* Backslope

*Landform position (three-dimensional):* Side slope

*Down-slope shape:* Convex

*Across-slope shape:* Convex

*Hydric soil rating:* No

#### Norma

*Percent of map unit:* 2 percent

*Landform:* Drainageways, depressions

*Landform position (three-dimensional):* Dip

*Down-slope shape:* Linear, concave

*Across-slope shape:* Concave

*Hydric soil rating:* Yes

## 85—Pits, gravel

### Map Unit Composition

*Pits:* 100 percent

*Estimates are based on observations, descriptions, and transects of the mapunit.*

### Description of Pits

#### Interpretive groups

*Land capability classification (irrigated):* None specified

*Land capability classification (nonirrigated):* 8

*Hydric soil rating:* No

## 88—Puget silt loam

### Map Unit Setting

*National map unit symbol:* 2nd9y  
*Elevation:* 10 to 650 feet  
*Mean annual precipitation:* 35 to 55 inches  
*Mean annual air temperature:* 48 to 50 degrees F  
*Frost-free period:* 160 to 180 days  
*Farmland classification:* Prime farmland if drained

### Map Unit Composition

*Puget, drained, and similar soils:* 85 percent  
*Minor components:* 15 percent  
*Estimates are based on observations, descriptions, and transects of the mapunit.*

### Description of Puget, Drained

#### Setting

*Landform:* Flood plains  
*Parent material:* Alluvium

#### Typical profile

*H1 - 0 to 9 inches:* silt loam  
*H2 - 9 to 60 inches:* silt loam

#### Properties and qualities

*Slope:* 0 to 3 percent  
*Depth to restrictive feature:* More than 80 inches  
*Drainage class:* Poorly drained  
*Capacity of the most limiting layer to transmit water (Ksat):* Moderately high (0.20 to 0.57 in/hr)  
*Depth to water table:* About 12 to 35 inches  
*Frequency of flooding:* OccasionalNone  
*Frequency of ponding:* None  
*Available water supply, 0 to 60 inches:* High (about 12.0 inches)

#### Interpretive groups

*Land capability classification (irrigated):* None specified  
*Land capability classification (nonirrigated):* 3w  
*Hydrologic Soil Group:* C  
*Ecological site:* F002XA008WA - Puget Lowlands Riparian Forest  
*Forage suitability group:* Soils with Few Limitations (G002XS501WA)  
*Other vegetative classification:* Soils with Few Limitations (G002XS501WA)  
*Hydric soil rating:* Yes

### Minor Components

#### Newberg

*Percent of map unit:* 5 percent  
*Hydric soil rating:* No

#### Puget, undrained

*Percent of map unit:* 5 percent

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*Other vegetative classification:* Wet Soils (G002XS101WA)  
*Hydric soil rating:* Yes

### **Semiahmoo, undrained**

*Percent of map unit:* 3 percent  
*Landform:* Depressions  
*Other vegetative classification:* Wet Soils (G002XS101WA)  
*Hydric soil rating:* Yes

### **Sultan**

*Percent of map unit:* 2 percent  
*Hydric soil rating:* No

## **89—Puyallup silt loam**

### **Map Unit Setting**

*National map unit symbol:* 2nd9z  
*Elevation:* 70 to 1,970 feet  
*Mean annual precipitation:* 35 to 60 inches  
*Mean annual air temperature:* 50 degrees F  
*Frost-free period:* 170 to 200 days  
*Farmland classification:* All areas are prime farmland

### **Map Unit Composition**

*Puyallup and similar soils:* 85 percent  
*Minor components:* 10 percent  
*Estimates are based on observations, descriptions, and transects of the mapunit.*

### **Description of Puyallup**

#### **Setting**

*Landform:* Terraces, flood plains  
*Parent material:* Alluvium

#### **Typical profile**

*H1 - 0 to 10 inches:* silt loam  
*H2 - 10 to 19 inches:* fine sandy loam  
*H3 - 19 to 60 inches:* sand

#### **Properties and qualities**

*Slope:* 0 to 3 percent  
*Depth to restrictive feature:* 14 to 20 inches to strongly contrasting textural stratification  
*Drainage class:* Well drained  
*Capacity of the most limiting layer to transmit water (Ksat):* Moderately high to high (0.57 to 1.98 in/hr)  
*Depth to water table:* More than 80 inches  
*Frequency of flooding:* OccasionalNone  
*Frequency of ponding:* None  
*Available water supply, 0 to 60 inches:* Low (about 3.2 inches)

**Interpretive groups**

*Land capability classification (irrigated): 3w*  
*Land capability classification (nonirrigated): 3w*  
*Hydrologic Soil Group: B*  
*Ecological site: F002XA008WA - Puget Lowlands Riparian Forest*  
*Forage suitability group: Droughty Soils (G002XS401WA)*  
*Other vegetative classification: Droughty Soils (G002XS401WA)*  
*Hydric soil rating: No*

**Minor Components**

**Newberg**

*Percent of map unit: 5 percent*  
*Hydric soil rating: No*

**Semiahmoo, undrained**

*Percent of map unit: 3 percent*  
*Landform: Depressions*  
*Other vegetative classification: Wet Soils (G002XS101WA)*  
*Hydric soil rating: Yes*

**Sultan**

*Percent of map unit: 2 percent*  
*Hydric soil rating: No*

**104—Semiahmoo muck**

**Map Unit Setting**

*National map unit symbol: 2nd7r*  
*Elevation: 10 to 1,300 feet*  
*Mean annual precipitation: 4 to 70 inches*  
*Mean annual air temperature: 46 to 50 degrees F*  
*Frost-free period: 125 to 250 days*  
*Farmland classification: Prime farmland if drained*

**Map Unit Composition**

*Semiahmoo, drained, and similar soils: 85 percent*  
*Minor components: 15 percent*  
*Estimates are based on observations, descriptions, and transects of the mapunit.*

**Description of Semiahmoo, Drained**

**Setting**

*Landform: Flood plains*  
*Parent material: Herbaceous organic material*

**Typical profile**

*Oa1 - 0 to 6 inches: muck*  
*Oa2 - 6 to 60 inches: muck*

## Custom Soil Resource Report

### Properties and qualities

*Slope:* 0 to 1 percent  
*Depth to restrictive feature:* More than 80 inches  
*Drainage class:* Very poorly drained  
*Capacity of the most limiting layer to transmit water (Ksat):* Moderately high to high (0.57 to 1.98 in/hr)  
*Depth to water table:* About 0 to 12 inches  
*Frequency of flooding:* None  
*Frequency of ponding:* None  
*Available water supply, 0 to 60 inches:* Very high (about 26.9 inches)

### Interpretive groups

*Land capability classification (irrigated):* None specified  
*Land capability classification (nonirrigated):* 5w  
*Hydrologic Soil Group:* B/D  
*Ecological site:* R002XA003WA - Puget Lowlands Bogs and Fens  
*Forage suitability group:* Wet Soils (G002XS101WA)  
*Other vegetative classification:* Wet Soils (G002XS101WA)  
*Hydric soil rating:* Yes

### Minor Components

#### Shalcar variant

*Percent of map unit:* 5 percent  
*Landform:* Depressions  
*Other vegetative classification:* Wet Soils (G002XS101WA)  
*Hydric soil rating:* Yes

#### Semiahmoo, undrained

*Percent of map unit:* 5 percent  
*Other vegetative classification:* Wet Soils (G002XS101WA)  
*Hydric soil rating:* Yes

#### Puget, undrained

*Percent of map unit:* 3 percent  
*Landform:* Depressions  
*Other vegetative classification:* Wet Soils (G002XS101WA)  
*Hydric soil rating:* Yes

#### Sultan

*Percent of map unit:* 2 percent  
*Hydric soil rating:* No

## 125—Xerorthents, 0 to 5 percent slopes

### Map Unit Setting

*National map unit symbol:* 2nd87  
*Elevation:* 0 to 2,620 feet  
*Mean annual precipitation:* 30 to 60 inches  
*Mean annual air temperature:* 39 to 50 degrees F  
*Frost-free period:* 150 to 200 days

## Custom Soil Resource Report

*Farmland classification:* Not prime farmland

### Map Unit Composition

*Xerorthents and similar soils:* 100 percent

*Estimates are based on observations, descriptions, and transects of the mapunit.*

### Description of Xerorthents

#### Setting

*Landform:* Tidal flats

*Parent material:* Sandy and loamy cut and fill material

#### Typical profile

*H1 - 0 to 60 inches:* variable

#### Properties and qualities

*Slope:* 0 to 5 percent

*Depth to restrictive feature:* More than 80 inches

*Drainage class:* Somewhat excessively drained

*Depth to water table:* About 24 inches

*Frequency of flooding:* None

*Frequency of ponding:* None

#### Interpretive groups

*Land capability classification (irrigated):* None specified

*Land capability classification (nonirrigated):* 7s

*Hydric soil rating:* No

## 129—Water

### Map Unit Composition

*Water:* 100 percent

*Estimates are based on observations, descriptions, and transects of the mapunit.*

### Description of Water

#### Setting

*Landform:* Alluvial cones

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## Custom Soil Resource Report

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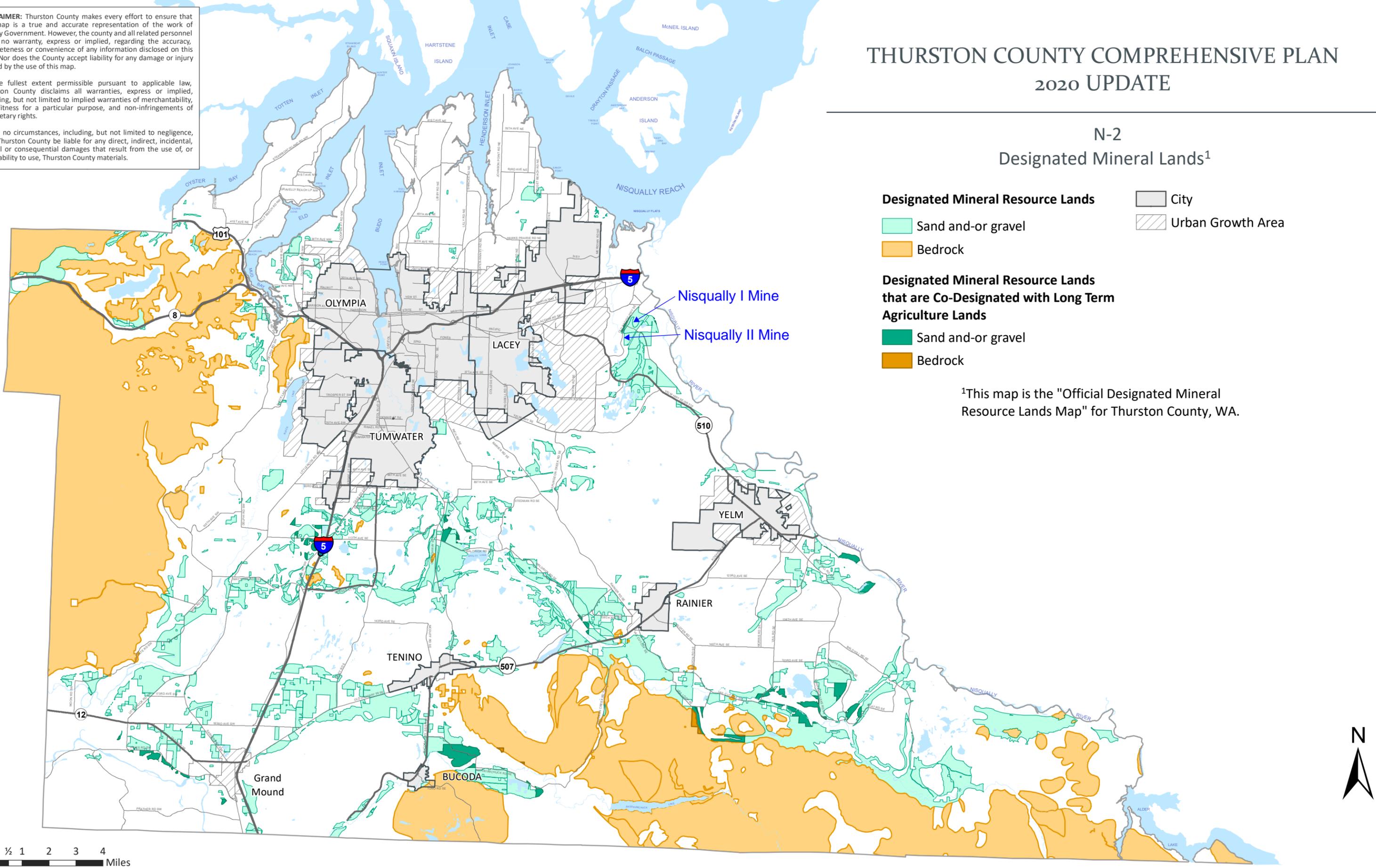
**DISCLAIMER:** Thurston County makes every effort to ensure that this map is a true and accurate representation of the work of County Government. However, the county and all related personnel make no warranty, express or implied, regarding the accuracy, completeness or convenience of any information disclosed on this map. Nor does the County accept liability for any damage or injury caused by the use of this map.

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# THURSTON COUNTY COMPREHENSIVE PLAN 2020 UPDATE

## N-2 Designated Mineral Lands<sup>1</sup>

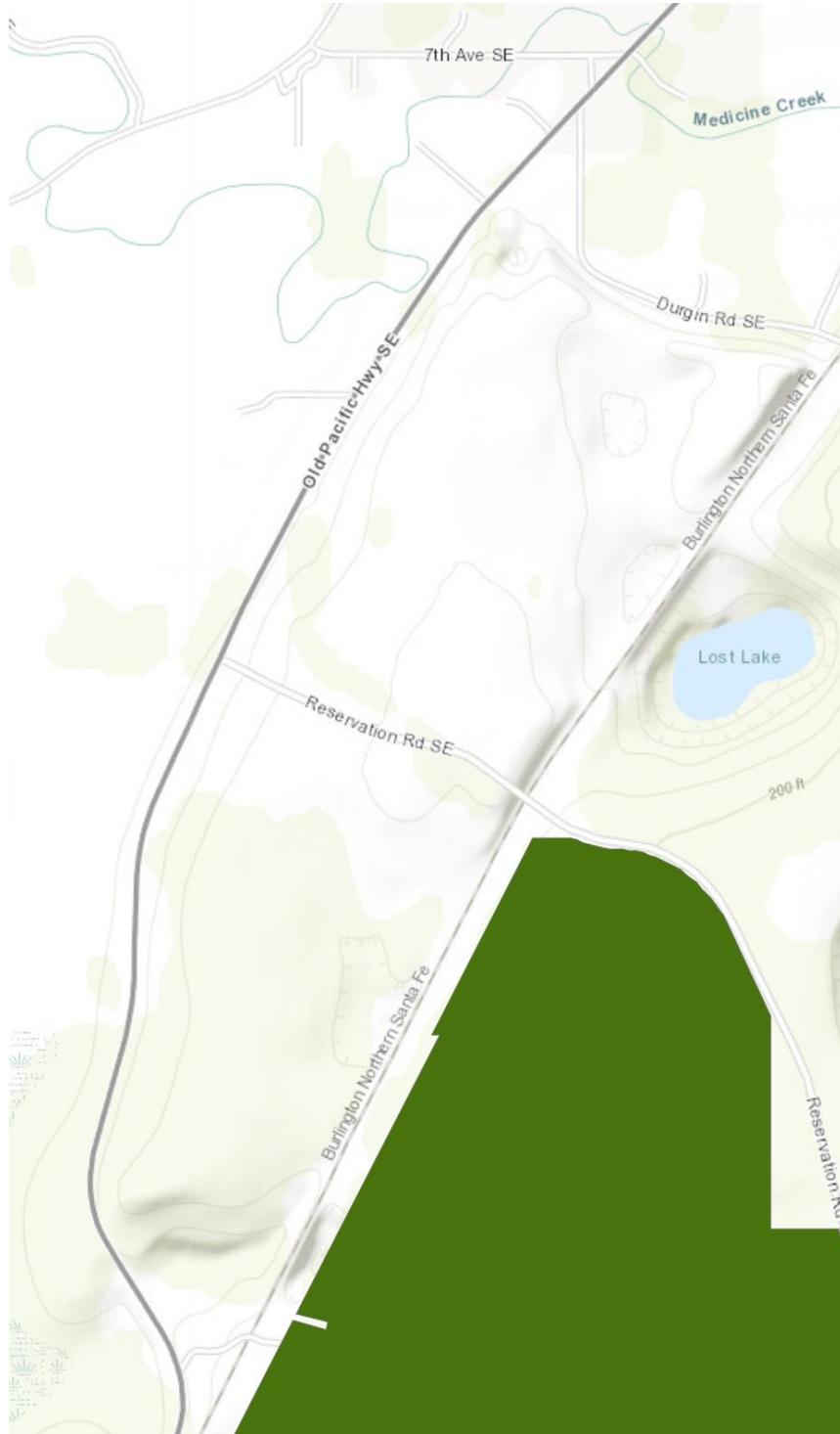


- Designated Mineral Resource Lands**
- Sand and-or gravel
- Bedrock
- Sand and-or gravel
- Bedrock
- City
- Urban Growth Area

<sup>1</sup>This map is the "Official Designated Mineral Resource Lands Map" for Thurston County, WA.



## Possible New LTA: Baseline



# Possible New LTA: Scenario 1



## Possible New LTA: Scenario 2





816 Second Ave, Suite 200, Seattle, WA 98104  
p. (206) 343-0681  
futurewise.org

June 17, 2023

Thurston County Community Planning and Economic Development  
Attn: Maya Teeple, Associate Planner  
3000 Pacific Avenue SE  
Olympia, WA 98501

Dear Ms. Teeple and Planning Commissioners:

Subject: Comments on the Agriculture Zoning Update  
Sent via email to: [maya.teeple@co.thurston.wa.us](mailto:maya.teeple@co.thurston.wa.us)

Thank you for the opportunity to comment on the Agriculture Zoning Update. Futurewise strongly supports the update and appreciates the improvements to the agricultural lands designations, policies, and zoning. We do have several recommendations that need to be incorporated into the update identified below. This letter first summarizes our recommendations. The letter then provides some information on the economic viability of agriculture in Thurston County and more detail on the recommendations after that.

Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable, and opportunity-rich communities, that protect our most valuable farmlands, forests, and water resources, and encourage growth in urban growth areas to prevent poorly planned sprawl. Futurewise has members across Washington State including Thurston County.

## Summary

- Increasing the farm and ranch land designated as Long-Term Agriculture (LTA) is necessary to protect working farms from being paved over or being adversely impacted by nearby incompatible uses. Please see page 3 of this letter for more information.
- The designation criteria should designate and zone prime farmland soils and farmland of statewide importance soils as Long-Term Agriculture (LTA) as WAC 365-190-050(3)(c)(i) provides. Please see page 5 of this letter for more information.
- The designation criteria should designate and zone as Long-Term Agriculture (LTA) smaller parcels when they are contiguous with other agricultural lands

as WAC 365-190-050(3)(c)(vi) provides. Please see page 7 of this letter for more information.

- The minimum density for development, other than farm worker housing, should be at least one dwelling unit per 40 acres and additional protection for working farms is needed. Please see page 8 of this letter for more information.
- Please clarify the Public Hearing Staff Report June 21, 2023, Attachment C. These clarifications are needed to comply with state law and protect working farms. Please see page 9 of this letter for more information.
- The County should adopt a policy calling for working with other agricultural organizations to analyze the feasibility of an agricultural water bank. This could potentially address some of the concerns over the availability of irrigation water. Please see page 11 of this letter for more information.
- Futurewise recommends against the test out options because the variability of soils makes the process of verifying soils difficult and recent increases in irrigated farmland make excluding currently unirrigated land problematic. Please see page 11 of this letter for more information.

## Thurston County farm sales and profits have increased.

Farm sales and farm incomes in Thurston County have increased substantially between 2012 and 2017. In 2017, the market value of products sold was \$176,090,000, an increase of 44 percent since 2012.<sup>1</sup> In 2017, net cash farm income totaled \$28,195,000, up 81 percent since 2012.<sup>2</sup> Thurston County ranked 13<sup>th</sup> highest in Washington State for total farm sales.<sup>3</sup> Thurston County farms ranked second highest in the state for poultry and eggs sales at \$49,799,000 and aquaculture at \$39,632,000.<sup>4</sup> Thurston County farms ranked third in market sales of nursery, greenhouse, floriculture, and sod at \$47,078,000.<sup>5</sup> Other agricultural sectors also do well.<sup>6</sup> As these statistics indicate, Thurston County farms do well economically and the industry, farms, and farmers need to be protected.

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<sup>1</sup> United States Department of Agriculture National Agricultural Statistics Service, *2017 Census of Agriculture County Profile Thurston County, Washington* p. \*1 last accessed on June 13, 2023, at: [https://www.nass.usda.gov/Publications/AgCensus/2017/Online\\_Resources/County\\_Profiles/Washington/cp53067.pdf](https://www.nass.usda.gov/Publications/AgCensus/2017/Online_Resources/County_Profiles/Washington/cp53067.pdf) and available at this Dropbox link <https://www.dropbox.com/sh/ok8ex8wmtgd3gdd4/AADV0-7wvrDZkW2EHd4gNDqGa?dl=0> with the filename: "cp53067.pdf."

<sup>2</sup> *Id.*

<sup>3</sup> *Id.* p. 2.

<sup>4</sup> *Id.*

<sup>5</sup> *Id.*

<sup>6</sup> *Id.* pp. 1 – 2.

## Detailed Recommendations

**Increasing the agricultural lands designated as Long-Term Agriculture (LTA) is necessary to protect working farms from being paved over or being adversely impacted by nearby incompatible uses.**

While agriculture's economics are good and improving, Thurston County continues to lose agricultural land.<sup>7</sup> Between just 2012 and 2017, the land in farms in Thurston County declined from 76,638 acres to 62,250 acres, a loss of 14,388 acres in only five years.<sup>8</sup> Increasing the designation of agricultural lands of long-term commercial significance is necessary to protect working farms from development. "More than 700 acres of farmland were developed between 2000 and 2011" in the Deschutes Study Area.<sup>9</sup> Another 3,726 acres of farmland in the Deschutes Study Area is vulnerable to development under the current comprehensive plan and zoning.<sup>10</sup> As the American Farmland Trust concluded:

Based on our estimations, most agricultural land is classified as RRR 1/5, which allows one dwelling unit for every five acres. Farmland in this zone is on smaller property sizes, dispersed among residential properties, and allows for many residential uses. Generally, agriculture in rural residential zones is poorly protected from developmental pressures. With large areas of farmland within the

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<sup>7</sup> United States Department of Agriculture National Agricultural Statistics Service, *2017 Census of Agriculture County Profile Thurston County, Washington* p. \*1.

<sup>8</sup> United States Department of Agriculture National Agricultural Statistics Service, *2017 Census of Agriculture Washington State and County Data Volume 1 •Geographic Area Series •Part 47AC-17-A-47* Table 8. Farms, Land in Farms, Value of Land and Buildings, and Land Use: 2017 and 2012 p. 288 (Issued April 2019) last accessed on June 13, 2023, at:

[https://www.nass.usda.gov/Publications/AgCensus/2017/Full\\_Report/Volume\\_1\\_Chapter\\_2\\_County\\_Level/Washington/](https://www.nass.usda.gov/Publications/AgCensus/2017/Full_Report/Volume_1_Chapter_2_County_Level/Washington/). And included in the following Dropbox link:

<https://www.dropbox.com/sh/ok8ex8wmttd3gdd4/AADV0-7wvrDZkW2EHd4gNDqGa?dl=0> with the filename: "wav1.pdf."

<sup>9</sup> Thurston County and the Thurston Regional Planning Council, *Deschutes Watershed Land Use Analysis: Scenario Development Report* p. 11 (Nov. 2016) last accessed on June 15, 2023, at:

<https://www.thurstoncountywa.gov/deschutes-watershed-study>. And included in the following Dropbox link: <https://www.dropbox.com/sh/ok8ex8wmttd3gdd4/AADV0-7wvrDZkW2EHd4gNDqGa?dl=0> with the filename: "cped-cp-docs-scenario-development-report.pdf."

<sup>10</sup> *Id.* at p. 30.

## Comments on the Agriculture Zoning Update

June 17, 2023

Page 4

RRR 1/5 zone, the County is apt to experience increased conversion to non-farm uses in the future.<sup>11</sup>

At 20 percent, Thurston County has the second lowest percentage of farmland in agricultural zoning of the eleven Puget Sound counties.<sup>12</sup> The Thurston Regional Planning Council has recommended that Thurston County “[a]dd additional lands to the agricultural zoning districts” to make the county’s protection of agricultural lands more effective.<sup>13</sup> Increasing the land designated as “Agriculture” and zoning the land “Long-Term Agriculture (LTA)” with a more protective minimum lot size and other improvements can protect the farmland from being paved over for development and better protected from incompatible uses.

Thurston County Countywide Planning Policy 3.1g directs the County to “[d]esignat[e] rural areas for low intensity, non-urban uses that preserve natural resource lands ....”<sup>14</sup> County comprehensive plans and development regulations must comply with countywide planning policies (CPPs).<sup>15</sup> The countywide planning policies were updated after the last major revision to the comprehensive plan including the designation of agricultural lands.<sup>16</sup> We appreciate that the County is updating its designation of agricultural lands to comply with the countywide planning policies.

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<sup>11</sup> Dennis Canty, Alex Martinsons, and Anshika Kumar, *Losing Ground: Farmland Protection in the Puget Sound Region* (Jan. 2012) Appendix B: Thurston County Scorecard p. 21. Appendix B last accessed on June 15, 2023, at: <https://farmlandinfo.org/publications/losing-ground-farmland-protection-in-the-puget-sound-region/> and included in the following Dropbox link: <https://www.dropbox.com/sh/ok8ex8wmttd3gdd4/AADV0-7wvrDZkW2EHd4gNDqGa?dl=0> with the filename: “AFT-Losing-Ground-Report-Appendix-B-County-Scorecard.pdf.”

<sup>12</sup> *Id.*

<sup>13</sup> Thurston Regional Planning Council, *Farmland Zero Net Loss: Setting the Stage* p. 1 & p. 11 and included in the following Dropbox link: <https://www.dropbox.com/sh/ok8ex8wmttd3gdd4/AADV0-7wvrDZkW2EHd4gNDqGa?dl=0> with the filename: “Farmland\_SettingTheStage-120215\_201512021449108596.pdf.”

<sup>14</sup> *Thurston County County-Wide Planning Policies* p. 6 (Nov. 10, 2015) last accessed on June 15, 2023, at: <https://www.trpc.org/DocumentCenter/View/2362/Final-Thurston-County-Wide-Planning-Policies-amended-11-10-15?bidId=>.

<sup>15</sup> *King Cty. v. Cent. Puget Sound Growth Mgmt. Hearings Bd.*, 138 Wn.2d 161, 175 – 768, 979 P.2d 374, 380 (1999); RCW 36.70A.210(1).

<sup>16</sup> *Thurston County Comprehensive Plan Chapter Three -- Natural Resource Lands* p. 3-4 (Revised 01/14) accessed on Oct. 2, 2019 at: <https://www.thurstoncountywa.gov/planning/Pages/comp-plan-current.aspx> and enclosed with the paper original of this letter; *Comprehensive Plan Thurston County, Washington M-15 Future Land Use* p. \*1 (Amended 2009); *Thurston County County-Wide Planning Policies* p. 6 (Nov. 10, 2015).

**The designation criteria should designate prime farmland soils and farmland of statewide importance soils Long-Term Agriculture (LTA) as WAC 365-190-050(3)(c)(i) provides.**

In the *City of Redmond* opinion, the State of Washington Supreme Court wrote that “[i]n addition to the statutory factors enumerated in RCW 36.70A.030(10) [now (18)], in WAC 365-190-050, the State Department of [Commerce], the agency charged by RCW 36.70A.170(2) with providing guidelines cities [and counties] must consult in designating natural resource lands, provides [11] factors for ‘classifying agricultural lands of long-term significance for the production of food or other agricultural products.’”<sup>17</sup> In the *Lewis County* decision, the state supreme court also wrote that “[i]n reviewing the designation of agricultural lands, the inquiry of the Growth Management Hearings Board and courts ‘should include whether the county’s decisions were ‘clearly erroneous’ in light of the considerations outlined in RCW 36.70A.030 or WAC 365-190-050.”<sup>18</sup>

In determining whether an area has long-term commercial significance, WAC 365-190-050(3)(c) provides that “counties and cities should consider the following nonexclusive criteria, as applicable: (i) The classification of prime and unique farmland soils, and farmlands of statewide importance, as mapped by the Natural Resources Conservation Service[.]”

WAC 365-190-050(5) provides “[w]hen applying the criteria in subsection (3)(c) of this section, 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; and to retain supporting agricultural businesses, such as processors, farm suppliers, and equipment maintenance and repair facilities.”

We appreciate and support that the designation criteria have been updated to include consideration of whether the area has prime farmland soils. We also recommend that farmland of statewide importance be designated as agricultural lands of long-term commercial significance if they also meet the other criteria as WAC 365-190-050(3)(c)(i) calls for. The farmlands of statewide importance soils are listed in Appendix A of this letter. These soils can be seen on the soil maps in the following Dropbox link:

<https://www.dropbox.com/sh/ok8ex8wmt43gdd4/AADVo->

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<sup>17</sup> *City of Redmond v. Cent. Puget Sound Growth Mgmt. Hearings Bd.*, 136 Wn.2d 38, 54, 959 P.2d 1091, 1098 (1998).

<sup>18</sup> *Lewis Cnty. v. W. Washington Growth Mgmt. Hearings Bd.*, 157 Wn. 2d 488, 504, 139 P.3d 1096, 1104 (2006).

[7wvrDZkW2EHd4gNDqGa?dl=0](#) with the filename: “Soils Maps for Larger Agricultural Areas Thurston Co 2019.pdf.”

Both prime and unique farmland soils and farmlands of statewide importance soils are high quality agricultural soils.<sup>19</sup> U.S. Department of Agriculture regulations generally define prime farmland soils as:

General. Prime farmland is land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops, and is also available for these uses (the land could be cropland, pastureland, rangeland, forest land, or other land, but not urban built-up land or water). It has the soil quality, growing season, and moisture supply needed to economically produce sustained high yields of crops when treated and managed, including water management, according to acceptable farming methods. In general, prime farmlands have an adequate and dependable water supply from precipitation or irrigation, a favorable temperature and growing season, acceptable acidity or alkalinity, acceptable salt and sodium content, and few or no rocks. They are permeable to water and air. Prime farmlands are not excessively erodible or saturated with water for a long period of time, and they either do not flood frequently or are protected from flooding.<sup>20</sup>

Similarly, the U.S. Department of Agriculture regulations define farmlands of statewide importance soils as:

Additional farmland of statewide importance. This is land, in addition to prime and unique farmlands, that is of statewide importance for the production of food, feed, fiber, forage, and oil seed crops. Criteria for defining and delineating this land are to be determined by the appropriate State agency or agencies. Generally, additional farmlands of statewide importance include those that are nearly prime farmland and that economically produce high yields of crops when treated and managed according to acceptable farming methods. Some may produce as high a yield as prime farmlands if conditions are favorable. In some States, additional farmlands of statewide

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<sup>19</sup> 7 Code of Federal Regulations (CFR) § 657.5(a) & (c) last accessed on June 15, 2023, at: <https://www.ecfr.gov/current/title-7/subtitle-B/chapter-VI/subchapter-F/part-657/subpart-A/section-657.5>.

<sup>20</sup> 7 CFR § 657.5(a)(1).

importance may include tracts of land that have been designated for agriculture by State law.<sup>21</sup>

As these U.S. Department of Agriculture regulations provide, prime farmland and farmlands of statewide importance soils are high quality agriculture soils. That is why WAC 365-190-050(3)(c)(i) calls for these high-quality soils to be designated and zoned as agricultural lands of long-term commercial significance which in Thurston County is referred to as Long-Term Agriculture (LTA). We strongly recommend that the designation criteria direct designating prime farmland soils and farmland of statewide importance soils as Long-Term Agriculture (LTA).

**The designation criteria should designate as Long-Term Agriculture (LTA) smaller parcels when they are contiguous with other agricultural lands as WAC 365-190-050(3)(c)(vi) provides.**

WAC 365-190-050(3)(c) provides that “counties and cities should consider the following nonexclusive criteria, as applicable: ... (vi) Predominant parcel size, which may include smaller parcels if contiguous with other agricultural resource lands[.]”

This is important because fields are often made up of more than one parcel. For example, Parcel 14501210000 located at 11645 183RD AVE SW is designated as agricultural lands of long-term commercial significance because in part it is 37.16 acres.<sup>22</sup> But three adjoining parcels that are part of the same field and in the same ownership are not because they are 15 acres, 9.57 acres, and 9.57 acres.<sup>23</sup> It makes no sense to split a field into two comprehensive plan designations and zones just because of the parcel sizes when they are all one field. There are other examples too.<sup>24</sup>

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<sup>21</sup> 7 CFR § 657.5(c).

<sup>22</sup> Data for Parcel No. 14501210000 with the filename: “Parcel Details 14501210000.pdf” available at this Dropbox link <https://www.dropbox.com/sh/ok8ex8wmtD3gdd4/AADV0-7wvrDZkW2EHd4gNDqGa?dl=0>.

<sup>23</sup> Data for Parcel No. 14501120000 (filename: “Parcel Details 14501120000.pdf”) Data for Parcel No. 14501120100 (filename: “Parcel Details 14501120100.pdf”), and Data for Parcel No. 14501120200 (filename: Parcel Details 14501120200.pdf”) and the parcel map for the area (filename: 183rd Ave SW Parcel Map.png) available at this Dropbox link <https://www.dropbox.com/sh/ok8ex8wmtD3gdd4/AADV0-7wvrDZkW2EHd4gNDqGa?dl=0>.

<sup>24</sup> See for example data for Parcel No. 13631330300 with the filename: “Parcel Details Parcel No. 13631330300.pdf” and Data for Parcel No. 13631330300 with the filename: “Parcel Details Parcel No. 13631330300.pdf” both at this Dropbox link <https://www.dropbox.com/sh/ok8ex8wmtD3gdd4/AADV0-7wvrDZkW2EHd4gNDqGa?dl=0>. The location of these parcels is shown on the parcel maps in the files: “Parcel 13631330100 Aerial.png” and “Parcel 13631330300 Aerial.png” at the prior Dropbox link.

Including smaller contiguous parcels will better protect agricultural land and provide more contiguous agricultural designations that better protect farmland from incompatible uses. It is also consistent with WAC 365-190-050(3)(c)(vi).

**The minimum density for development should be at least 40 acres and additional protection for working farms is needed.**

As was noted above, while agriculture's economics are good and improving, Thurston County continues to lose agricultural land.<sup>25</sup> Between just 2012 and 2017, the land in farms in Thurston County declined from 76,638 acres to 62,250 acres, a loss of 14,388 acres.<sup>26</sup>

As the American Farmland Trust explains:

To make substantial progress protecting farmland in the Puget Sound region, minimum parcel size would be at least 40 acres and preferably larger. This would ensure that parcels will remain large enough to allow commercial agriculture in the future, help prevent residential development of farmland, and keep per-acre land values down to a level affordable to farmers.<sup>27</sup>

Professor Arthur Nelson agrees writing that “[l]ot sizing for agriculture at up to 40-acre densities merely causes rural sprawl.”<sup>28</sup> Agricultural zoning should have a

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<sup>25</sup> United States Department of Agriculture National Agricultural Statistics Service, *2017 Census of Agriculture County Profile Thurston County, Washington* p. \*1.

<sup>26</sup> United States Department of Agriculture National Agricultural Statistics Service, *2017 Census of Agriculture Washington State and County Data Volume 1 •Geographic Area Series •Part 47AC-17-A-47* Table 8. Farms, Land in Farms, Value of Land and Buildings, and Land Use: 2017 and 2012 p. 288 (Issued April 2019).

<sup>27</sup> Dennis Canty, Alex Martinsons, and Anshika Kumar, *Losing Ground: Farmland Protection in the Puget Sound Region* p. 9 (Jan. 2012) last accessed on June 15, 2024 at:

<https://farmlandinfo.org/publications/losing-ground-farmland-protection-in-the-puget-sound-region/> and included in the following Dropbox link:

<https://www.dropbox.com/sh/ok8ex8wmtdd4/AADV0-7wvrDZkW2EHd4gNDqGa?dl=0> with the filename: “AFTLosingGroundReportWeb-1\_1.pdf.”

<sup>28</sup> Arthur Nelson, *Preserving Prime Farmland in the Face of Urbanization: Lessons from Oregon* 58

JOURNAL OF THE AMERICAN PLANNING ASSOCIATION 467, 471 – 74 (1992) included in the following

Dropbox link: <https://www.dropbox.com/sh/ok8ex8wmtdd4/AADV0-7wvrDZkW2EHd4gNDqGa?dl=0>

with the filename: “Preserving Prime Farmland in the Face of Urbanization Lessons from Oregon JAPA.pdf. The Journal of the American Planning Association is a peer-reviewed journal. Journal of the American Planning Association Instructions for Authors

minimum lot size and density of one dwelling unit per 40 acres like the Nisqually Agricultural District. Farmworker housing should be allowed at higher densities as the revised zoning will do.

The American Farmland Trust also explains that:

Non-agricultural uses of land in agricultural zones can lead to conflicts between farmers and other residents over the sounds, smells, and appearance of normal agricultural activities. However, it is important that farmers be allowed to operate businesses associated with farm production, such as farm stands and processing facilities. In general, a short list of allowable uses restricted to farming, farm-related businesses and other compatible uses is desirable.<sup>29</sup>

We support these recommendations. The development regulations for the Long-Term Agriculture (LTA) zone should be updated to reflect these recommendations to comply with the Growth Management Act requirement to conserve agricultural land.<sup>30</sup>

In addition, the Washington State Supreme Court has held that “[t]he County was required to assure the conservation of agricultural lands and to assure that the use of adjacent lands does not interfere with their continued use for the production of food or agricultural products.”<sup>31</sup> To protect working farms, adjacent nonagricultural uses should be setback at least 100 feet from fields and other agricultural uses and buffers and fencing provided and maintained on the nonagricultural lands to protect the working farms from incompatible uses.

### **Please clarify the Public Hearing Staff Report June 21, 2023 Attachment C.**

Attachment C on pages 3-8 and 3-9 states that the designation of agricultural lands of long-term commercial significance protects working farms from nearby incompatible uses “by notifying nearby neighbors that agricultural uses could occur nearby which might cause dust, noise, and odors.” But as was documented

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webpage p. 1 of 8 included in the following Dropbox link:

<https://www.dropbox.com/sh/ok8ex8wmtD3gdd4/AADVo-7wvrDZkW2EHd4gNDqGa?dl=0> with the filename: “JAPA Instructions for Authors.pdf.”

<sup>29</sup> Dennis Canty, Alex Martinsons, and Anshika Kumar, *Losing Ground: Farmland Protection in the Puget Sound Region* p. 9 (Jan. 2012).

<sup>30</sup> *King Cnty. v. Central Puget Sound Growth Management Hearings Bd. (Soccer Fields)*, 142 Wn.2d 543, 556, 14 P.3d 133, 140 (2000).

<sup>31</sup> *King Cnty. v. Central Puget Sound Growth Management Hearings Bd. (Soccer Fields)*, 142 Wn.2d 543, 556, 14 P.3d 133, 140 (2000) emphasis in original.

above, the county is required “*to assure that the use of adjacent lands does not interfere with their continued use for the production of food or agricultural products.*”<sup>32</sup> This requires more than just communicating that agricultural uses might cause dust, noise, and odors. The agricultural uses must actually be protected from adjacent incompatible uses. This statement should be clarified.

Page 3-13 includes the following sentence: “Landowners may apply to voluntarily add individual properties to the designation through a comprehensive plan amendment proves.” It appears that “proves” is unneeded and can be deleted.

Page 3-13 describes the criteria and the process the County will use to evaluate the designation of agricultural lands of long-term commercial significance. This existing language is inconsistent with the newly adopted amendments to WAC 365-190-040(10)(b). WAC 365-190-040(10)(b) provides in full that:

(b)(i) De-designations of natural resource lands can undermine the original designation process. De-designations threaten the viability of natural resource lands and associated industries through conversion to incompatible land uses, and through operational interference on adjacent lands. Cumulative impacts from de-designations can adversely affect the ability of natural resource-based industries to operate.

(ii) Counties and cities should maintain and enhance natural resource-based industries and discourage incompatible uses. Because of the significant amount of time needed to review natural resource lands and potential impacts from incompatible uses, frequent, piecemeal de-designations of resource lands should not be allowed. Site-specific proposals to de-designate natural resource lands must be deferred until a comprehensive countywide analysis is conducted.

Similarly, WAC 365-190-050(1) provides in relevant part that:

(1) In classifying, designating and de-designating agricultural resource lands, counties must conduct a comprehensive countywide analysis consistent with WAC 365-190-040(10). Counties and cities should not review resource lands designations solely on a parcel-by-parcel basis. Counties and cities must have a program for the transfer

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<sup>32</sup> *King Cnty. v. Central Puget Sound Growth Management Hearings Bd. (Soccer Fields)*, 142 Wn.2d 543, 556, 14 P.3d 133, 140 (2000) emphasis in original.

or purchase of development rights prior to designating agricultural resource lands in urban growth areas.

As can be seen, WAC 365-190-040(10)(b) and WAC 365-190-050(1) require a countywide analysis, but the existing language implies an area or site can be dedesignated. Further, the existing language does not include the required analysis. This section should be updated consistent with WAC 365-190-040(10)(b) and WAC 365-190-050(1).

### **Work with other agricultural organizations to analyze the feasibility of an agricultural water bank.**

During the planning process, the availability of irrigation water was identified as an issue. Reducing rural development on permit-exempt wells can help to reduce adverse impacts on agricultural water rights.

In addition, agricultural water banks have been created to allow farmers to lease water rights from farmers and others and to obtain additional water rights to lease. For example, the Snoqualmie Valley Watershed Improvement District has a water bank that leases water to farmers from other water rights holders and, under the right circumstances, the district's own water right.<sup>33</sup> The district is also exploring other options to obtain additional irrigation water.<sup>34</sup> The County should consider adding a comprehensive plan policy to explore the feasibility of an agricultural water bank with other interested agencies and partners.

### **We recommend against the test out options.**

Attempts to “test” soil types are subject to significant error. One of the reasons is that soil series descriptions within a soil survey report have a range of characteristics.<sup>35</sup> So any individual soil sample is unlikely to exactly match the soil series description.<sup>36</sup> This can be seen in the results of the 2009-2010 “tests” where

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<sup>33</sup> Snoqualmie Valley Watershed Improvement District “Water Bank” webpage last accessed on June 6, 2023, at: <https://svwid.com/water-bank/#1670344987451-61584081-4f16>.

<sup>34</sup> Snoqualmie Valley Agriculture Production District (SVAPD) Agriculture Task Force, *Snoqualmie Valley Agricultural Strategic Plan* Public Review Draft pp. 56 – 59 (May 2023) last accessed on June 6, 2023, at: <https://kingcounty.gov/services/environment/watersheds/snoqualmie-skykomish/fish-farms-flooding/ag-strategic-plan-task-force.aspx>.

<sup>35</sup> Submitted by Allen S. Zulauf, Soil Scientist, Soil Science Society of America, Emeritus, Attachment D Review and Analysis of Submitted Soil Report p. 1 included in the following Dropbox link: <https://www.dropbox.com/sh/ok8ex8wmttd3gdd4/AADV0-7wvrDZkW2EHd4gNDqGa?dl=0> with the filename: “Soil Report Eval Orton.pdf.”

<sup>36</sup> *Id.* pp. 1 – 2.

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about 225 acres (49 percent of original requests) were dedesignated.<sup>37</sup> That led to an appeal where these removals were offset by adding another 188 acres from Rural Residential Resource 1/5 to Long-Term Agriculture (LTA).<sup>38</sup> The 225 acres dedesignated was eight percent of “roughly 2,800 new acres” designated as Long-Term Agriculture (LTA) in 2008.<sup>39</sup> The eight percent dedesignation and the smaller net change, 37 acres, shows that soil surveys are quite accurate, particularly taking into account the natural variability of soils identified by Zulauf.<sup>40</sup>

We also agree with the Thurston County Agriculture Advisory Committee that because irrigation changes over time, the prime when irrigated soils should not be subject to being removed if they are not irrigated.<sup>41</sup> The changing nature of irrigated farmland can be seen in the increase in irrigated farmland between 2012 and 2017. The irrigated land farmland in Thurston County increased from 5,309 acres in 2012 to 6,402 acres in 2017.<sup>42</sup>

Thank you for considering our comments. If you require additional information, please contact me at telephone 206-343-0681 Ext. 102 or email [tim@futurewise.org](mailto:tim@futurewise.org).

Very Truly Yours,



Tim Trohimovich, WSBA No. 22367  
Director of Planning & Law

Enclosures in the following Dropbox link:

<https://www.dropbox.com/sh/ok8ex8wmtD3gdd4/AADV0-7wvrDZkW2EHd4gNDqGa?dl=0>

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<sup>37</sup> Public Hearing Staff Report June 21, 2023 Attachment A p. 2.

<sup>38</sup> *Id.*

<sup>39</sup> *Id.*

<sup>40</sup> Submitted by Allen S. Zulauf, Soil Scientist, Soil Science Society of America, Emeritus, Attachment D Review and Analysis of Submitted Soil Report pp. 1 – 2.

<sup>41</sup> Public Hearing Staff Report June 21, 2023 Attachment A pp. 2 – 3.

<sup>42</sup> United States Department of Agriculture National Agricultural Statistics Service, *2017 Census of Agriculture Washington State and County Data Volume 1 •Geographic Area Series •Part 47AC-17-A-47* Table 10. Irrigation: 2017 and 2012 p. 306 (Issued April 2019).

## Appendix A: Farmland of Statewide Importance in Thurston County

Map Unit Symbol	Map Unit Name	Rating	Acres
3	Alderwood gravelly sandy loam, 15 to 30 percent slopes	Farmland of statewide importance	6,333
9	Baumgard loam, 10 to 40 percent slopes	Farmland of statewide importance	6,862
15	Boistfort silt loam, 5 to 20 percent slopes	Farmland of statewide importance	1,434
17	Bunker gravelly silt loam, 5 to 30 percent slopes	Farmland of statewide importance	467
21	Cathcart gravelly loam, 3 to 15 percent slopes	Farmland of statewide importance	6,976
22	Cathcart gravelly loam, 15 to 35 percent slopes	Farmland of statewide importance	4,603
23	Centralia silt loam, 8 to 15 percent slopes	Farmland of statewide importance	2,476
24	Centralia silt loam, 15 to 30 percent slopes	Farmland of statewide importance	3,027
27	Delphi very gravelly loam, 3 to 15 percent slopes	Farmland of statewide importance	3,216
28	Delphi very gravelly loam, 15 to 30 percent slopes	Farmland of statewide importance	3,145
32	Everett very gravelly sandy loam, 0 to 8 percent slopes	Farmland of statewide importance	11,218
33	Everett very gravelly sandy loam, 8 to 15 percent slopes	Farmland of statewide importance	13,702
34	Everett very gravelly sandy loam, 15 to 30 percent slopes	Farmland of statewide importance	2,586
39	Giles silt loam, 3 to 15 percent slopes	Farmland of statewide importance	1,661

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Map Unit Symbol	Map Unit Name	Rating	Acres
40	Giles silt loam, 15 to 30 percent slopes	Farmland of statewide importance	443
42	Grove very gravelly sandy loam, 3 to 15 percent slopes	Farmland of statewide importance	1,677
43	Hoogdal silt loam, 15 to 30 percent slopes	Farmland of statewide importance	598
48	Indianola loamy sand, 15 to 30 percent slopes	Farmland of statewide importance	2,545
51	Kapowsin silt loam, 3 to 15 percent slopes	Farmland of statewide importance	8,623
52	Kapowsin silt loam, 15 to 30 percent slopes	Farmland of statewide importance	1,137
54	Kapowsin stony loam, 0 to 3 percent slopes	Farmland of statewide importance	539
55	Kapowsin stony loam, 3 to 15 percent slopes	Farmland of statewide importance	1,542
58	Lates silt loam, 8 to 30 percent slopes	Farmland of statewide importance	286
60	Mal clay loam, 5 to 30 percent slopes	Farmland of statewide importance	1,407
62	Mashel loam, 5 to 30 percent slopes	Farmland of statewide importance	3,528
66	Melbourne silty clay loam, 5 to 20 percent slopes	Farmland of statewide importance	4,918
74	Nisqually loamy fine sand, 3 to 15 percent slopes	Farmland of statewide importance	4,013
77	Olympic silt loam, 5 to 20 percent slopes	Farmland of statewide importance	3,672
79	Pheeny gravelly loam, 5 to 30 percent slopes	Farmland of statewide importance	2,676

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Map Unit Symbol	Map Unit Name	Rating	Acres
87	Prather silty clay loam, 8 to 20 percent slopes	Farmland of statewide importance	242
90	Rainier clay loam, 5 to 30 percent slopes	Farmland of statewide importance	3,737
93	Raught silt loam, 5 to 30 percent slopes	Farmland of statewide importance	2,375
98	Salkum silty clay loam, 8 to 15 percent slopes	Farmland of statewide importance	2,015
99	Salkum silty clay loam, 15 to 30 percent slopes	Farmland of statewide importance	1,230
101	Scamman silty clay loam, 5 to 20 percent slopes	Farmland of statewide importance	1,385
108	Skipopa silt loam, 3 to 15 percent slopes	Farmland of statewide importance	6,404
111	Spanaway gravelly sandy loam, 3 to 15 percent slopes	Farmland of statewide importance	3,051
112	Spanaway stony sandy loam, 0 to 3 percent slopes	Farmland of statewide importance	1,966
113	Spanaway stony sandy loam, 3 to 15 percent slopes	Farmland of statewide importance	1,090
117	Tenino gravelly loam, 3 to 15 percent slopes	Farmland of statewide importance	6,664
118	Tenino gravelly loam, 15 to 30 percent slopes	Farmland of statewide importance	3,216
121	Vailton silt loam, 5 to 30 percent slopes	Farmland of statewide importance	214
123	Wilkeson silt loam, 5 to 20 percent slopes	Farmland of statewide importance	5,716
127	Yelm fine sandy loam, 3 to 15 percent slopes	Farmland of statewide importance	4,158

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Map Unit Symbol	Map Unit Name	Rating	Acres
128	Yelm fine sandy loam, 15 to 30 percent slopes	Farmland of statewide importance	411
1105	Yelm-Steilacoom-Everett complex, 0 to 30 percent slopes	Farmland of statewide importance	161
1220	Salzer silty clay loam, 0 to 3 percent slopes	Farmland of statewide importance	121
2101	McChord-Everett complex, 3 to 15 percent slopes	Farmland of statewide importance	1,026
2103	McChord-Everett complex, 15 to 30 percent slopes	Farmland of statewide importance	306
3100	Everett-Spanaway complex, 3 to 15 percent slopes	Farmland of statewide importance	46
3110	Indianola-Yelm complex, 0 to 30 percent slopes	Farmland of statewide importance	57
3210	Nemah silt loam, 0 to 5 percent slopes	Farmland of statewide importance	2
3403	Gate silty clay loam, 5 to 20 percent slopes	Farmland of statewide importance	46
Total			150,949

Sources: USDA Natural Resources Conservation Service, Prime and other Important Farmlands–Thurston County Area, Washington pp. 2 - 7 of 7 (6/1/2023) enclosed at this Dropbox link:

<https://www.dropbox.com/sh/ok8ex8wmtD3gdd4/AADVo-7wvrDZkW2EHd4gNDqGa?dl=0> with the filename:

20230601\_13594401408\_16\_Prime\_and\_other\_Important\_Farmlands--Thurston\_County.pdf;” USDA Natural Resources Conservation Service, *Legend–Thurston County Area, Washington* pp. 1 - 5 of 5 (6/1/2023) enclosed at this Dropbox link: <https://www.dropbox.com/sh/ok8ex8wmtD3gdd4/AADVo-7wvrDZkW2EHd4gNDqGa?dl=0> with the filename:

“20230601\_14040502971\_30\_Legend--Thurston\_County\_Area\_Washington.pdf.”

**From:** [Ashley Arai](#)  
**To:** [Maya Teeple](#)  
**Subject:** FW: Incoming Comment Ag Project  
**Date:** Tuesday, June 13, 2023 5:32:18 PM

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FYI

**Ashley Arai** | Agriculture Community Program Manager  
**Thurston County Community Planning & Economic Development**  
**Community Planning Division**  
3000 Pacific Ave SE, Olympia, Washington 98501  
**Cell (Primary):** (360) 280-9298  
[Ashley.Arai@co.thurston.wa.us](mailto:Ashley.Arai@co.thurston.wa.us) | [www.thurstonplanning.org](http://www.thurstonplanning.org)

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**From:** Jennifer Colvin <jennifer@colvinranch.com>  
**Sent:** Tuesday, June 13, 2023 2:23 PM  
**To:** Ashley Arai <ashley.arai@co.thurston.wa.us>  
**Subject:** Re: Incoming Comment Ag Project

Thanks for your time just now! A few comments on the zoning...

I understand that the county is only looking at parcel size. However, if it would be possible to also look at parcel size and owner, it would provide more accurate picture of larger areas of land that are used for ag. Just using our property as an example, we have several parcels, some that are smaller than others. If you look at the parcel individually, it doesn't look like much, but if you look at all of the smaller parcels that have the same owner that are next to each other, it can add up to a significant area. `

When considering soil types for agriculture, please also consider the soil types that support livestock ag, not just crops. Our soil type is terrible for farming, but is really good for raising livestock even with no irrigation. Livestock ag is a large part of agriculture in the county as a whole and it would be a lost opportunity if that wasn't recognized.

Thanks for all of the outreach you're doing on this!

Jennifer

On Jun 13, 2023, at 1:50 PM, Jennifer Colvin <[jennifer@colvinranch.com](mailto:jennifer@colvinranch.com)> wrote:

Me too! I'll give you a call :)

On Jun 13, 2023, at 1:49 PM, Ashley Arai <[ashley.arai@co.thurston.wa.us](mailto:ashley.arai@co.thurston.wa.us)> wrote:

I am free until 2:30 and then I have to go pick up my kiddos from school.

**Ashley Arai** | Agriculture Community Program Manager  
**Thurston County Community Planning & Economic Development**  
**Community Planning Division**  
3000 Pacific Ave SE, Olympia, Washington 98501

Cell (Primary): (360) 280-9298  
[Ashley.Arai@co.thurston.wa.us](mailto:Ashley.Arai@co.thurston.wa.us) | [www.thurstonplanning.org](http://www.thurstonplanning.org)

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**From:** Jennifer Colvin <[jennifer@colvinranch.com](mailto:jennifer@colvinranch.com)>  
**Sent:** Tuesday, June 13, 2023 1:48 PM  
**To:** Ashley Arai <[ashley.arai@co.thurston.wa.us](mailto:ashley.arai@co.thurston.wa.us)>  
**Subject:** Re: Incoming Comment Ag Project

Thanks, Ashley. That would be great if we could do a quick call. Do you have some time this afternoon?

Jennifer

On Jun 13, 2023, at 1:19 PM, Ashley Arai <[ashley.arai@co.thurston.wa.us](mailto:ashley.arai@co.thurston.wa.us)> wrote:

Hi Jennifer,

It's so nice to hear from you! The parcels you see included in the current mapping scenarios were selected based on proposed criteria related to parcel size, percentage of prime farmland soils, and block sizes of agricultural land, etc. I've provided a summary table below if you want to see a more detailed breakdown of the information used for each map.

We have also received public comment about adding an 'opt-in' clause so that landowners have the option of rezoning all of their farm to Long-Term Agriculture rather than just the parcels that meet the criteria listed below. In terms of property values, agriculture zoning protects farmland by limiting residential development. Our stakeholders have consistently shared that property owners should be compensated for this loss of development rights through programs like the Transfer of Development Rights (TDR) or the Purchase of Development Rights (PDR). The County was recently awarded a grant to update the current TDR and PDR programs so they're more effective tools for supporting landowners in the future.

I know this is a lot of information, so please don't hesitate to give me a call if you have follow-up questions or want to share additional thoughts. The Planning Commission will be holding a public hearing on this project on June 21, so this is great timing for having your comments considered.

Kindest regards,

Ashley

**Ashley Arai** | Agriculture Community Program Manager  
**Thurston County Community Planning & Economic Development**  
**Community Planning Division**  
3000 Pacific Ave SE, Olympia, Washington 98501  
**Cell (Primary):** (360) 280-9298  
[Ashley.Arai@co.thurston.wa.us](mailto:Ashley.Arai@co.thurston.wa.us) | [www.thurstonplanning.org](http://www.thurstonplanning.org)

**Mapping Scenario Summary Table**

Information	Current LTA Designation	Baseline – Based on Appeal	Scenario 1 – Based on Stakeholder Themes	Scenario 2 – Based on Stakeholder Themes
<b>Acreage of LTA</b>	15,500	Additional 22,000	Additional 12,000	Additional 19,000
<b>Criteria that are outside the scope of discussion as set by BoCC</b>				
<b>Criteria 3. Land Capability and Tax Status</b>	Used or capable of being used for agriculture	Applied without change	Applied without change	Applied without change
<b>Criteria 6. Land Use Settlement Patterns</b>	Adjacent residential development should be minimal and at densities of 1 per 5 acres or less.	Applied without change	Applied without change	Applied without change
<b>Criteria 7. Proximity of Markets</b>	Should have access to road, rail, or air transportation routes	Applied without change	Applied without change	Applied without change
<b>Criteria 9. Environmental Considerations</b>	Outside of Natural Shoreline Environments	Applied without change	Applied without change	Applied without change
<b>Criteria that are within the scope of discussion as set by BoCC</b>				
<b>Criteria 1. Soils information</b>	1990 USDA Soil Survey, predominantly prime farmland soils (>50%)	2022 USDA Web Soil Survey predominantly prime farmland soils (>50%)	2022 USDA Web Soil Survey predominantly prime farmland soils (>75%)	2022 USDA Web Soil Survey predominantly prime farmland soils (>75%)
<b>Criteria 2. Availability of public facilities and services</b>	Designated lands should be outside of area planned to be served by public facilities and utilities	Applied without change	Applied without change	Applied without change
<b>Criteria 4. Proximity to Urban Growth</b>	Designated lands should be outside of	Applied without change	Applied without change	Applied without change

<b>Areas</b>	urban growth areas and should be separated by a natural or man-made barrier			
<b>Criteria 5. Predominant Parcel Size</b>	20 acres or more	20 acres	20 acres	15 acres
<b>Criteria 8. Agricultural Diversity</b>	Agricultural Block of Land must be: 320 acres or 200 acres if nearby to other agriculture	320 acres or 200 if nearby	100 acres or more	40 acres or more

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**From:** Jennifer Colvin <[donotreply@wordpress.com](mailto:donotreply@wordpress.com)>  
**Sent:** Tuesday, June 13, 2023 6:21 AM  
**To:** Maya Teeple <[maya.teeple@co.thurston.wa.us](mailto:maya.teeple@co.thurston.wa.us)>; Ashley Arai <[ashley.arai@co.thurston.wa.us](mailto:ashley.arai@co.thurston.wa.us)>  
**Subject:** Incoming Comment Ag Project

## You got a new response!

**Name:**  
Jennifer Colvin

**Email:**  
[jennifer@colvinranch.com](mailto:jennifer@colvinranch.com)

**Comment:**  
How have properties been selected for possible long-term ag? Looking at the map for our area, some of our parcels have been selected and some have not, even though they all have the same soil types and the same owner and are right next to each other. In some scenarios, the large parcels neighboring us with the same soil types that are currently in ag are not selected even though there is no difference between those parcels and ours, except that they are across the street. Will property owners have a say in whether their land will be designated long-term ag? Can we make suggestions for other parcels that should be in long-term ag that have not been currently identified? How will this change property values and taxes for land that is zoned long-term ag? Can a property owner prevent their land from being zoned long-term ag?

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Time: June 13, 2023 at 1:20 pm  
IP Address: 99.51.77.120  
Source URL: <https://thurstoncomments.org/comment-on-ag-project/>

Sent by an unverified visitor to your site.

**From:** [Maya Teeple](#)  
**To:** [Amanda Cecil](#)  
**Subject:** RE: Land use zoning change  
**Date:** Thursday, June 15, 2023 2:58:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Hi Amanda,

Sorry for the delay in my response. I've looked at your two parcels listed below, and you would not be impacted under the current options. The current zoning, RRR 1/5, would remain on those two properties as the proposals are drafted now. Under scenario 2, the property directly east of 12633310102 could be included.

Please let me know if you have any further questions.

Kindly,  
Maya



**Maya Teeple** (She/Her) | **Senior Planner**  
**Thurston County Community Planning & Economic Development**  
**Community Planning Division**  
3000 Pacific Ave SE, Olympia, Washington 98501  
**Cell (Primary):** (360) 545-2593  
[Maya.Teeple@co.thurston.wa.us](mailto:Maya.Teeple@co.thurston.wa.us) | [www.thurstonplanning.org](http://www.thurstonplanning.org)

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**From:** Amanda Cecil <cecil.amanda@gmail.com>  
**Sent:** Tuesday, June 13, 2023 1:42 PM  
**To:** Maya Teeple <maya.teeple@co.thurston.wa.us>  
**Subject:** Land use zoning change

Hi Maya. I own two 10 acre lots that are undeveloped. Will this change make my lots unbuildable? Based on this website I don't think it would impact us but I got an email from the WA Farm Forestry Assc. that says something about 20 acre mins.

If it is helpful here are our lot numbers.

12633310102

12633310103

[Thurston Planning Commission to Hold Two Public Hearings on June 21](#)  
[thurstoncountywa.gov](http://thurstoncountywa.gov)



Thank you for any input you can provide!

Amanda Cecil  
(360) 556-8070

**From:** [dwhein68@comcast.net](mailto:dwhein68@comcast.net)  
**To:** [Maya Teeple](#)  
**Subject:** Thurston County Comprehensive Plan \_ Long-Term Agriculture (LTA) designation  
**Date:** Wednesday, June 14, 2023 11:27:14 AM

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To: Maya Teeple, Senior Planner, Thurston County  
From: League of Women Voters Thurston County  
Re: Changes to criteria for Long-Term Agriculture (LTA) designation

Thank you for the opportunity to provide comments on potential changes to the Thurston County Comprehensive Plan and related Development Code language regarding changes to the criteria for Long-Term Agriculture (LTA) designation, a policy designed to protect parcels with prime agricultural soils. The League of Women Voters Thurston County (LWVTC) recommends that the Thurston County Planning Commission move forward a recommendation that adds additional soil types to the soils criterion and make other updates to the Comprehensive Plan and Development Code as recommended by staff. These changes would increase the LTA designation by between 12,000 and 22,000 acres. This action, if approved by the BoCC, would help prevent a non-reversible alteration to lands with prime agriculture soils. The action would assure the highest consideration be given to preservation of more productive soils for current or future food production, an important value not only of the LWV but of the larger community.

The zoning aspect of these changes has consequences for the value of land as current asset and in future sales. Specifically, the decreased opportunity to subdivide the land would reduce the land value. We agree with the Stakeholder groups recommendation to compensate landowners for this lost land value. While the Planning Commission is not being asked to comment on compensation, we urge the Commission to forward the Stakeholder group recommendation to the BoCC along with the Comprehensive Plan and Development Code changes.

**From:** [Randy Person](#)  
**To:** [Maya Teeple](#)  
**Cc:** [artcatweaver@q.com](mailto:artcatweaver@q.com)  
**Subject:** RE: Ag land rezone  
**Date:** Thursday, June 15, 2023 7:32:39 PM  
**Attachments:** [image002.png](#)

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Maya, that's a good catch. We have a possibly unique situation. Back in the 1850s, Marise's great-grandfather did some trading with the then-new railroad. That's why the western boundary is the edge of the railroad right of way. The family ownership extends to the south, into Lewis county. The parcel is contiguous, and we have over 30 acres in forest classification. That was important when we applied for forest classification, as of course, we manage the entire ownership as a unit. The trees don't care that there is a line on a map that runs through the stand!

Thank you for following up on this. Although it may not impact this parcel, we do stand with our colleagues in the WFFA to request that the proposed changes not apply to family forest land. The points we made in our letter likely apply to most, if not all, family forest parcels in Thurston County. We appreciate that you'll let the commission know of our concerns.

Sincerely,  
Marise and Randy Person

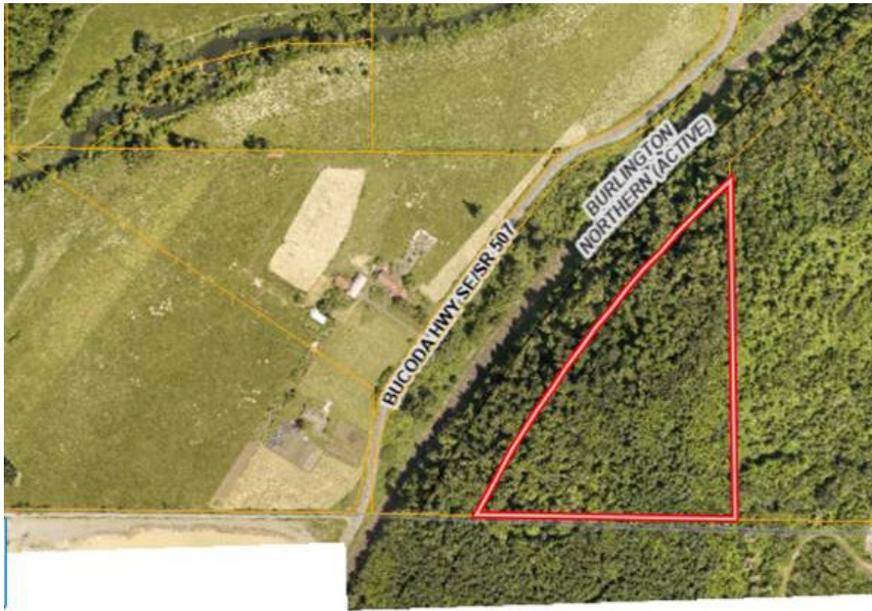
On Thu, 15 Jun, 2023 at 12:23 PM, Maya Teeple <[maya.teeple@co.thurston.wa.us](mailto:maya.teeple@co.thurston.wa.us)> wrote:

To: randy person  
Cc: [artcatweaver@q.com](mailto:artcatweaver@q.com)

Hi Randy and Marie,

Thank you for your comment. I will provide this to the Planning Commission for considerations.

I just want to double check – is the parcel you list below your only forested parcel? I checked this parcel, and it is not impacted by any of the options for proposed rezone (though some land across SR 507 is). If this is the only parcel – it means the current zoning, RRR 1/5, would remain as the options are currently drafted.



Kindly,  
Maya



**Maya Teeple** (She/Her) | **Senior Planner**  
**Thurston County Community Planning & Economic Development**  
**Community Planning Division**  
3000 Pacific Ave SE, Olympia, Washington 98501  
**Cell (Primary):** (360) 545-2593  
[Maya.Teeple@co.thurston.wa.us](mailto:Maya.Teeple@co.thurston.wa.us) | [www.thurstonplanning.org](http://www.thurstonplanning.org)

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**From:** Randy Person <[rmperson@q.com](mailto:rmperson@q.com)>  
**Sent:** Wednesday, June 14, 2023 11:48 AM  
**To:** Maya Teeple <[maya.teeple@co.thurston.wa.us](mailto:maya.teeple@co.thurston.wa.us)>

**Cc:** [artcatweaver@g.com](mailto:artcatweaver@g.com)

**Subject:** Ag land rezone

Maya, our Thurston county small family forest is a remnant of a family homestead first established in the 1850s. We are able to stand the pressures for development today because of other income, and feel we are contributing to future needs for forest products, as well as providing wildlife, clean air, and other important side benefits. Part of our planning includes potential use when the land passes to other generations. They may not be able to maintain our husbandry, for a variety of reasons.

We are surrounded by home development on 5-acre and smaller lots. If future owners choose to convert, they should have the choice of keeping the land intact, or melding into the overall neighborhood development layout. Raising the minimum lot size will only make it far more expensive to develop, including costs for access and power. The value of the land will drop significantly, impacting our plans for passing along a legacy for our children. All it will do for the county is require far more land to be used for the several families who could call our small parcel home today.

Generations of good management of our land were predicated on the current land use regulations. Significant, and expensive, management choices were made based on future potential. Please do not pull the rug from under our family's future. Leave the zoning for our small family forest plot as it is.

Thank you,  
Marise and Randy Person, 12522330000

**From:** [Ashley Arai](#)  
**To:** [Maya Teeple](#)  
**Subject:** FW: Long term agriculture question.  
**Date:** Thursday, June 15, 2023 2:26:42 PM

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FYI

**Ashley Arai** | Agriculture Community Program Manager  
**Thurston County Community Planning & Economic Development**  
**Community Planning Division**  
3000 Pacific Ave SE, Olympia, Washington 98501  
**Cell (Primary):** (360) 280-9298  
[Ashley.Arai@co.thurston.wa.us](mailto:Ashley.Arai@co.thurston.wa.us) | [www.thurstonplanning.org](http://www.thurstonplanning.org)

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**From:** Bonnie Blessing <bonnie.blessing@gmail.com>  
**Sent:** Wednesday, June 14, 2023 3:15 PM  
**To:** Ashley Arai <ashley.arai@co.thurston.wa.us>  
**Subject:** Long term agriculture question.

So this proposed designation of Long Term agriculture. It applies to certain soils **if** those soils are drained. So many (probably all) of the spotted frogs in Tumwater occur on or near *those* Mukilteo Muck soils and many of the spotted frogs occur on Mukilteo muck in Thurston.

It is unlikely that draining these soils is appropriate for the frogs.

Does designation as long-term agriculture confer some benefits or exclusion from any sort of oversight? If so then it sort of encourages the draining of those Mukilteo muck soils. Is anyone commenting on this?

I'll try to comment. Is it too late? Thanks

I'm trying to read:

[https://s3.us-west-2.amazonaws.com/thurstoncountywa.gov.if-us-west-2/s3fs-public/2023-06/cped-board-PC\\_PC%206.21.2023-PC-Hearing-AgZoningUpdateStaffReport-reduced.pdf](https://s3.us-west-2.amazonaws.com/thurstoncountywa.gov.if-us-west-2/s3fs-public/2023-06/cped-board-PC_PC%206.21.2023-PC-Hearing-AgZoningUpdateStaffReport-reduced.pdf)

Thanks Ashley;

Bonnie

**From:** [Ashley Arai](#)  
**To:** [Maya Teeple](#)  
**Subject:** FW: Agriculture Zoning Update - More Info  
**Date:** Thursday, June 15, 2023 2:59:39 PM

For the record

**Ashley Arai** | Agriculture Community Program Manager  
**Thurston County Community Planning & Economic Development**  
**Community Planning Division**  
 3000 Pacific Ave SE, Olympia, Washington 98501  
**Cell (Primary):** (360) 280-9298  
[Ashley.Arai@co.thurston.wa.us](mailto:Ashley.Arai@co.thurston.wa.us) | [www.thurstonplanning.org](http://www.thurstonplanning.org)

**From:** Ashley Arai  
**Sent:** Thursday, June 15, 2023 11:59 AM  
**To:** John Grenier <john.edward.grenier@gmail.com>  
**Cc:** Jody <jodermarie@gmail.com>  
**Subject:** RE: Agriculture Zoning Update - More Info

So nice to meet you last night and thank you for following up! It appears the property located at 2200 150<sup>th</sup> Ln SE in Tenino is included in the 'Baseline Scenario', which considers parcels at least 20 acres in size, with a minimum of 50% prime farmland soils and within a 200-320 acre block of agricultural land. It does not show up in Mapping Scenarios 1 or 2. The chart below provides a quick summary of the different criteria used for each scenario. Please feel free to reach out if you have any additional questions or thoughts you'd like to share.

Information	Current LTA Designation	Baseline – Based on Appeal	Scenario 1 – Based on Stakeholder Themes	Scenario 2 – Based on Stakeholder Themes
<b>Acreage of LTA</b>	15,500	Additional 22,000	Additional 12,000	Additional 19,000
<b>Criteria that are outside the scope of discussion as set by BoCC</b>				
<b>Criteria 3. Land Capability and Tax Status</b>	Used or capable of being used for agriculture	Applied without change	Applied without change	Applied without change
<b>Criteria 6. Land Use Settlement Patterns</b>	Adjacent residential development should be minimal and at densities of 1 per 5 acres or less.	Applied without change	Applied without change	Applied without change
<b>Criteria 7. Proximity of Markets</b>	Should have access to road, rail, or air	Applied without change	Applied without change	Applied without change

	transportation routes			
<b>Criteria 9. Environmental Considerations</b>	Outside of Natural Shoreline Environments	Applied without change	Applied without change	Applied without change
<b>Criteria that are within the scope of discussion as set by BoCC</b>				
<b>Criteria 1. Soils information</b>	1990 USDA Soil Survey, predominantly prime farmland soils (>50%)	2022 USDA Web Soil Survey predominantly prime farmland soils (>50%)	2022 USDA Web Soil Survey predominantly prime farmland soils (>75%)	2022 USDA Web Soil Survey predominantly prime farmland soils (>75%)
<b>Criteria 2. Availability of public facilities and services</b>	Designated lands should be outside of area planned to be served by public facilities and utilities	Applied without change	Applied without change	Applied without change
<b>Criteria 4. Proximity to Urban Growth Areas</b>	Designated lands should be outside of urban growth areas and should be separated by a natural or man-made barrier	Applied without change	Applied without change	Applied without change
<b>Criteria 5. Predominant Parcel Size</b>	20 acres or more	20 acres	20 acres	15 acres
<b>Criteria 8. Agricultural Diversity</b>	Agricultural Block of Land must be: 320 acres or 200 acres if nearby to other agriculture	320 acres or 200 if nearby	100 acres or more	40 acres or more

**Ashley Arai** | Agriculture Community Program Manager  
**Thurston County Community Planning & Economic Development**  
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[Ashley.Arai@co.thurston.wa.us](mailto:Ashley.Arai@co.thurston.wa.us) | [www.thurstonplanning.org](http://www.thurstonplanning.org)

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**From:** John Grenier <[john.edward.grenier@gmail.com](mailto:john.edward.grenier@gmail.com)>  
**Sent:** Wednesday, June 14, 2023 9:47 PM  
**To:** Ashley Arai <[ashley.arai@co.thurston.wa.us](mailto:ashley.arai@co.thurston.wa.us)>  
**Cc:** Jody <[jodermarie@gmail.com](mailto:jodermarie@gmail.com)>

**Subject:** Re: Agriculture Zoning Update - More Info

Thank you so much for taking the time to speak with us. I really appreciate your long day!

Jody and I did not get a postcard ... we heard about this only through word of mouth. Can you please check to see if our parcel (technically Jody M Becker 2200 150th Ln SE, Tenino, WA 98589's parcel) is slated for re-zoning?

Many thanks,

JODY & JOHN

On Wed, Jun 14, 2023, 9:00 PM Ashley Arai <[ashley.arai@co.thurston.wa.us](mailto:ashley.arai@co.thurston.wa.us)> wrote:

Hello,

Thank you all again for taking time out of your evening to learn more about the County's Agriculture Zoning Update. I appreciated our conversation and am happy to answer any follow-up questions. Here are some additional resources I mentioned that provide more detailed info:

[Project Webpage](#): This webpage has an overview of the project and a searchable [online map](#).

[Planning Commission Webpage](#): This webpage has materials from our last two work sessions on May 3 and May 17, as well as the upcoming hearing on June 21. Written comments are due at noon on the 21<sup>st</sup> or you can share your feedback with the Planning Commission during the 7:00 hearing (in person or via Zoom).

At the bottom of the page you will also find the roster.

Kindly,

Ashley

**Ashley Arai** | Agriculture Community Program Manager  
**Thurston County Community Planning & Economic Development**  
**Community Planning Division**

3000 Pacific Ave SE, Olympia, Washington 98501

**Cell (Primary):** (360) 280-9298

[Ashley.Arai@co.thurston.wa.us](mailto:Ashley.Arai@co.thurston.wa.us) | [www.thurstonplanning.org](http://www.thurstonplanning.org)

**From:** [Jamie Rainwood](#)  
**To:** [Maya Teeple](#); [Ashley Arai](#)  
**Subject:** Incoming Comment Ag Project  
**Date:** Thursday, June 15, 2023 7:35:50 PM

---

## You got a new response!

**Name:**  
Jamie Rainwood

**Email:**  
[jamierainwood@gmail.com](mailto:jamierainwood@gmail.com)

**Comment:**  
I support protecting farm land and farmers. If we don't, our children's children will think we were very stupid to build on all the arable land and cause them to reclaim land to grow food!

---

Time: June 15, 2023 at 11:35 pm  
IP Address: 136.226.64.115  
Source URL: <https://thurstoncomments.org/comment-on-ag-project/>

Sent by an unverified visitor to your site.

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**From:** [Vanessa LaValle](#)  
**To:** [Maya Teeple](#)  
**Subject:** Protect Thurston County Farms  
**Date:** Sunday, June 18, 2023 11:10:36 AM

---

County Staff and Planning Commissioners,

Thurston County has lost too much of our valuable farmland. Between 2012 and 2017, Thurston County has lost 14,388 acres of land in farms. During that same period net farm income increased by 81 percent to \$28,195,000. Conserving our working farms helps produce high quality local food, protects the environment, and is good for the economy.

I urge you to:

- Recommend approval of the new policies and regulations for the designation and conservation of working farms in Thurston County including considering all prime farmland soils for designation as Long-Term Agriculture (LTA) if they meet the other criteria.
- Recommend designating farmland of statewide importance soils for as Long-Term Agriculture (LTA) if they meet the other criteria.
- Include parcels smaller than 20 acres in the Long-Term Agriculture (LTA) designation when they meet the County's criteria and are adjacent to other LTA designations. This would allow fields that consist of a 30-acre lot and a nine acre lot to be designated and protected.
- Adopt better regulations to protect farmland from McMansions and incompatible uses.

Thank you for considering my comments.

Sincerely,  
Vanessa LaValle  
6741 Alpine Dr SW  
Olympia, WA 98512

**From:** [Joel Carlson](#)  
**To:** [Maya Teeple](#)  
**Subject:** Protect Thurston County Farms  
**Date:** Sunday, June 18, 2023 11:20:38 AM

---

County Staff and Planning Commissioners,

We have growth management laws to protect Washington from endless sprawl everywhere and protect valuable farmland, forests, etc.

Thurston County has lost too much of our valuable farmland. Between 2012 and 2017, Thurston County has lost 14,388 acres of land in farms. During that same period net farm income increased by 81 percent to \$28,195,000. Conserving our working farms helps produce high quality local food, protects the environment, and is good for the economy.

I urge you to:

- Recommend approval of the new policies and regulations for the designation and conservation of working farms in Thurston County including considering all prime farmland soils for designation as Long-Term Agriculture (LTA) if they meet the other criteria.
- Recommend designating farmland of statewide importance soils for as Long-Term Agriculture (LTA) if they meet the other criteria.
- Include parcels smaller than 20 acres in the Long-Term Agriculture (LTA) designation when they meet the County's criteria and are adjacent to other LTA designations. This would allow fields that consist of a 30-acre lot and a nine acre lot to be designated and protected.
- Adopt better regulations to protect farmland from McMansions and incompatible uses.

Thank you for considering my comments.

Sincerely,  
Joel Carlson  
3634 Loren St NE  
Lacey, WA 98516

**From:** [Sandler & Seppanen](#)  
**To:** [Maya Teeple](#)  
**Subject:** Comments regarding changes to criteria for Long-Term Agriculture (LTA) designation  
**Date:** Sunday, June 18, 2023 3:37:35 PM

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Thank you for the opportunity to provide comments on potential changes to the Thurston County Comprehensive Plan and related Development Code language that improve the designation (Long-Term Agriculture (LTA) designation) and conservation of prime farmland in Thurston County.

The changes the Planning Commission is considering would increase the LTA designation by between 12,000 and 23,000 acres. The action would assure the highest consideration be given to preservation of more productive soils for current or future food production. I support changes to the soils criterion for LTA designation and other updates to the Comprehensive Plan and Development Code as recommended by staff. More specifically:

- **For soils**, I support parcels with 75% prime soils coverage. While serving on the Stakeholder group I learned this is important to landowners with larger parcels. On larger parcels the 75% threshold protects the land that is most needed to be protected. (Scenario 1 or 2)
- **For parcel size**, I recommend making no change from the current minimum of 20 acres. Please ignore the suggestion of 15 acres which comes from the statistical calculation of average parcel size. Given the skewed distribution of parcel sizes the average is not a meaningful number. The median parcel size is 6 for all agricultural land – half the parcels are larger, and half are smaller. A minimum of 20 acres protects the most threatened farmland.
- **Block size is not a GMA requirement.** I support deleting block from the criteria. Alternatively, a 40-acre block size could be combined with the inclusion of adjacent smaller parcels could work to assure protection of meaningful agricultural zones as opposed to individual parcels. A zone would include, for example, a nine-acre parcel between two 20- or 40- acre parcels designated and protected.
- **For the Comp Plan Chapter 3 policies**, I urge you to add a policy that is explicit about the development limits inherent in LTA designation (and NA designation as well). The policy should read something like this: Those areas with Long-Term Agriculture designations shall have a residential density of one dwelling unit per 20 acres. Those areas with Nisqually Agricultural designation shall have residential density of one dwelling unit per 40 acres. (modeled after Clark County policy language.)
- **For the Comp Plan narrative in Chapter 3**, I support the changes as recommended by staff except, delete reference to average parcel size (page 28).
- **I support the recommended Development Code** changes.

These actions alone are not enough. I also support these next steps:

- A Planning Commission request to move swiftly to identify funding sources to compensate landowners for the lost land value, because of the change to LTA designation (lost development rights).
- Include in the Comprehensive Plan Update consideration of these changes to LTA designation that have not yet been considered by a Stakeholder group or other community outreach:
  - Examine the current exclusion of lands within the McAllister Springs aquifer recharge area from LTA designation based on the rationale of the “the sensitivity of the aquifer to pesticide and fertilizer use, and the proximity to urban uses to the north.” This area south of the Yelm highway is outside the UGA, currently predominately in agricultural use (turf and berry farming) on land with water rights and soils recognized as among the best in the county (American Farmland Trust).
  - Consider farmland of statewide importance soils for designation as Long-Term Agriculture (LTA) if they meet the other criteria.
- Include in the Comprehensive Plan Update a new policy that would permit landowners with parcels outside the LTA zones, but with prime soils or soils of statewide significance to voluntarily permanently change their zoning to preclude subdividing the parcel.

Loretta Seppanen

**From:** [Lori Stefano](#)  
**To:** [Maya Teeple](#)  
**Subject:** Protect Thurston County Farms  
**Date:** Sunday, June 18, 2023 5:54:40 PM

---

County Staff and Planning Commissioners,

Thurston County has lost too much of our valuable farmland. Between 2012 and 2017, Thurston County has lost 14,388 acres of land in farms. During that same period net farm income increased by 81 percent to \$28,195,000. Conserving our working farms helps produce high quality local food, protects the environment, and is good for the economy.

I urge you to:

- Recommend approval of the new policies and regulations for the designation and conservation of working farms in Thurston County including considering all prime farmland soils for designation as Long-Term Agriculture (LTA) if they meet the other criteria.
- Recommend designating farmland of statewide importance soils for as Long-Term Agriculture (LTA) if they meet the other criteria.
- Include parcels smaller than 20 acres in the Long-Term Agriculture (LTA) designation when they meet the County's criteria and are adjacent to other LTA designations. This would allow fields that consist of a 30-acre lot and a nine acre lot to be designated and protected.
- Adopt better regulations to protect farmland from McMansions and incompatible uses.

Thank you for considering my comments.

Sincerely,  
Lori Stefano  
22440 Vale Ct SE  
Yelm, WA 98597

**From:** [Madeline Bishop](#)  
**To:** [Maya Teeple](#)  
**Subject:** Input on Chapter 3 - Comp Plan Updates - LTA  
**Date:** Sunday, June 18, 2023 6:07:12 PM

---

My Name is: Madeline Bishop, from Olympia  
My Email Address is: [mfbishop.bishop@gmail.com](mailto:mfbishop.bishop@gmail.com)

Please adopt these updates to the Comp Plan.

Please approve designating more acres as Long-Term Agriculture (LTA) by updating the soils criteria.

- Swiftly identify funding sources to compensate landowners for the lost land value (lost development rights) from LTA designation.
- Include smaller parcels in the LTA designation when they meet adjacent to other LTA designations and with prime ag soils. This would include, for example, a nine-acre parcel between two 20- or 40- acre parcels to be designated and protected.
- Consider farmland of statewide importance soils for designation as Long-Term Agriculture (LTA) if they meet the other criteria.
- Add a new policy that would permit landowners with parcels outside the LTA zones, but with prime soils or soils of statewide significance to voluntarily permanently change their zoning to preclude subdividing the parcel.

**From:** [PEGGY SMITH](#)  
**To:** [Maya Teeple](#)  
**Subject:** Changes to Long-Term Agriculture criteria for designation  
**Date:** Sunday, June 18, 2023 6:43:25 PM

---

The following will serve as my comments on potential changes to the Thurston County Comprehensive Plan and related Development Code language. My main aim is to improve Long-Term Agriculture (LTA) designations. I am also interested, generally, in conservation of prime farmland in Thurston County.

I have been following the Thurston County Agriculture Policy review, as part of a work group composed of League of Women Voters of Thurston County (LWVTC) members. I have been concerned about, and advocated for, ways to preserve farmland, particularly small farms, for many years. I certainly appreciate being able to take advantage of this opportunity to comment.

I believe that it is possible to increase the amount of land designated LTA by **adding additional, appropriate soil types to the soils criterion for LTA designation**. This action would contribute to the highest consideration being given to preservation of more productive soils for current or future food production.

The effectiveness of this action should be supported and enhanced by other policies and practices.

I think it is vital for the County to identify funding sources to compensate landowners for the lost land value, or lost development rights, because of the change to LTA designation.

I would support a new policy statement that makes explicit the implication of the Development Code language that reduces the landowner ability to subdivide to not less than 20 (or 15) acres per house for LTA.

I think there should be an examination of the current exclusion from LTA designation of lands within the McAllister Springs aquifer recharge area. I understand the exclusion is based on the rationale of "the sensitivity of the aquifer to pesticide and fertilizer use, and the proximity to urban uses to the north." However, this area south of the Yelm highway is outside the UGA, and it is currently predominately in agricultural use (turf and berry farming) on land with water rights and soils recognized as among the best in the county.

There should be consideration given to including smaller parcels in the LTA designation when they are adjacent to other LTA designated parcels and have prime agricultural soils. This would, for example, enable a nine-acre parcel between two 20 or 40 acre parcels to be designated and protected.

Finally, it would be in our County's best interest to consider farmland "of statewide importance soils" as being eligible for designation as LTA if they meet the other criteria.

Thank you again for considering my comments,  
R Peggy Smith, Ph.D.

**From:** [Esther Kronenberg](#)  
**To:** [Maya Teeple](#)  
**Subject:** Protect Thurston County Farms  
**Date:** Sunday, June 18, 2023 8:34:37 PM

---

County Staff and Planning Commissioners,

Thurston County has lost too much of our valuable farmland. Between 2012 and 2017, Thurston County has lost 14,388 acres of land in farms. During that same period net farm income increased by 81 percent to \$28,195,000. Conserving our working farms helps produce high quality local food, protects the environment, and is good for the economy.

I urge you to:

- Recommend approval of the new policies and regulations for the designation and conservation of working farms in Thurston County including considering all prime farmland soils for designation as Long-Term Agriculture (LTA) if they meet the other criteria.
- Recommend designating farmland of statewide importance soils for as Long-Term Agriculture (LTA) if they meet the other criteria.
- Include parcels smaller than 20 acres in the Long-Term Agriculture (LTA) designation when they meet the County's criteria and are adjacent to other LTA designations. This would allow fields that consist of a 30-acre lot and a nine acre lot to be designated and protected.
- Adopt better regulations to protect farmland from McMansions and incompatible uses.

Thank you for considering my comments.

Sincerely,  
Esther Kronenberg  
3206 36th Ave NW  
Olympia, WA 98502

**From:** [Esther Kronenberg](#)  
**To:** [Maya Teeple](#); [Ashley Arai](#)  
**Subject:** Incoming Comment Ag Project  
**Date:** Sunday, June 18, 2023 7:14:28 PM

---

## You got a new response!

**Name:**  
Esther Kronenberg

**Email:**  
[wekrone@gmail.com](mailto:wekrone@gmail.com)

**Comment:**  
Hello,  
In addition to my previous comments, please also avoid draining prime soils occupied by OSF because quote 'draining of wetlands with Oregon spotted frogs should be avoided' . (page 6-5 on page 83 of <https://wdfw.wa.gov/sites/default/files/publications/00025/wdfw00025.pdf>).

The County must be vigilant to not further encroach on the habitat of this endangered species.

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Time: June 18, 2023 at 11:14 pm  
IP Address: 75.172.15.88  
Source URL: <https://thurstoncomments.org/comment-on-ag-project/>

Sent by an unverified visitor to your site.

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**From:** [Joseph Hiss](#)  
**To:** [Maya Teeple](#)  
**Subject:** Protect Thurston County Farms  
**Date:** Monday, June 19, 2023 1:40:40 AM

---

County Staff and Planning Commissioners,

Between 2012 and 2017, Thurston County has lost 14,388 acres of land in farms. But conserving our working farms not only helps produce high quality local food, but can also protect the environment.

I therefore urge you to:

- (1) Recommend approval of the new regulations for designation and conservation of working farms in Thurston County.
- (2) Recommend considering all prime farmland of statewide importance soils for designation as Long-Term Agriculture (LTA) if they meet criteria.
- (3) Include parcels smaller than 20 acres in the Long-Term Agriculture (LTA) designation when they meet the County's criteria and are adjacent to other LTA designations. This would allow fields that consist of lots of less than 20 acres to be designated and protected.
- (4) Adopt better regulations to protect farmland from McMansions and other incompatible uses.

Thank you for considering my comments.

Sincerely,  
Joseph Hiss  
225 17th Ave SE  
Olympia, WA 98501

**From:** [Sharon Herting](#)  
**To:** [Maya Teeple](#)  
**Subject:** Input on Chapter 3 - Comp Plan Updates - LTA  
**Date:** Monday, June 19, 2023 11:14:54 AM

---

My Name is: Sharon Herting, from Olympia  
My Email Address is: seherting@hotmail.com

Please approve designating more acres as Long-Term Agriculture (LTA) by updating the soils criteria.

Swiftly identify funding sources to compensate landowners for the lost land value (lost development rights) from LTA designation.

Include smaller parcels in the LTA designation when they meet adjacent to other LTA designations and with prime ag soils. This would include, for example, a nine-acre parcel between two 20- or 40- acre parcels to be designated and protected.

Consider farmland of statewide importance soils for designation as Long-Term Agriculture (LTA) if they meet the other criteria.

Add a new policy that would permit landowners with parcels outside the LTA zones, but with prime soils or soils of statewide significance to voluntarily permanently change their zoning to preclude subdividing the parcel.

Sharon

“Teach us to care and not to care. Teach us to sit still.” T. S. Eliot

**From:** [Carol Stevens](#)  
**To:** [Maya Teeple](#)  
**Subject:** Protect Thurston County Farms  
**Date:** Monday, June 19, 2023 11:44:58 AM

---

County Staff and Planning Commissioners,

Thurston County has lost too much of our valuable farmland. Between 2012 and 2017, Thurston County has lost 14,388 acres of land in farms. During that same period net farm income increased by 81 percent to \$28,195,000. Conserving our working farms helps produce high quality local food, protects the environment, and is good for the economy.

I urge you to:

- Recommend approval of the new policies and regulations for the designation and conservation of working farms in Thurston County including considering all prime farmland soils for designation as Long-Term Agriculture (LTA) if they meet the other criteria.
- Recommend designating farmland of statewide importance soils for as Long-Term Agriculture (LTA) if they meet the other criteria.
- Include parcels smaller than 20 acres in the Long-Term Agriculture (LTA) designation when they meet the County's criteria and are adjacent to other LTA designations. This would allow fields that consist of a 30-acre lot and a nine acre lot to be designated and protected.
- Adopt better regulations to protect farmland from McMansions and incompatible uses.

Thank you for considering my comments.

Sincerely,  
Carol Stevens  
18701 Old Camp Ln SE  
Yelm, WA 98597

**From:** [Steve Giesecke](#)  
**To:** [Maya Teeple](#)  
**Subject:** Agriculture Zoning Proposal  
**Date:** Monday, June 19, 2023 2:53:05 PM

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June 19, 2023

Good morning Ms Teeple:

I am a Thurston County property owner who received your postcard indicating my property (P/N 13934210000) may be affected by subject program.

This parcel is currently zoned residential and is classified as undeveloped land. The Thurston County Planning and Permits Dept (now called the "Building Development Center") recently told me that it could be developed by going through the environmental impact/reasonable use exception process.

This meeting and its conclusions was documented.

As such, the land, which I just purchased last year, has considerable value and I have received written offers attesting to this.

I have some initial questions:

First, is my property affected by the proposed zoning change?

If the answer to this question is "yes," then please explain how the county will compensate land owners for a rezoning that considerably lessens the value of their property. Rezoning from "residential" to "agriculture" will essentially destroy the value of the property.

Civil law, which is replete with relevant precedent case history, provides for property owners to be reimbursed for unilateral Government actions that reduce or adversely affect the value of their land, the cost [reduction] which can be proven (e.g. based on current written offers for purchase of said property; market value of similar property sales zoned as residential vs agricultural, etc). Court cases that are won by the property owner also typically stipulate that the cost of legal services procured by impacted property owners be paid for by the Government (i.e. the County in this case).

Sincerely

Stephan Giesecke  
4625 Oyster Bay Rd NW  
Olympia, WA 98502  
(360) 561-3803

**From:** [Liz Schotman](#)  
**To:** [Maya Teeple](#)  
**Subject:** Protect Thurston County Farms  
**Date:** Monday, June 19, 2023 3:42:41 PM

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County Staff and Planning Commissioners,

Hello! One of my favorite aspects of living in Thurston County is my ability to secure hyperlocal food grown by people I know. It is vital not just for our economy and well-being but also for our future that we protect valuable agricultural land, especially small farms. While I recognize the need for more housing as our area grows, we cannot afford to lose more farmland. We've already lost almost 15,000 acres in the past decade. I have lived in places where developers were allowed to pave over agricultural land, and the only people who benefited from it were those developers.

I urge you to:

- Recommend approval of the new policies and regulations for the designation and conservation of working farms in Thurston County including considering all prime farmland soils for designation as Long-Term Agriculture (LTA) if they meet the other criteria.
- Recommend designating farmland of statewide importance soils for as Long-Term Agriculture (LTA) if they meet the other criteria.
- Include parcels smaller than 20 acres in the Long-Term Agriculture (LTA) designation when they meet the County's criteria and are adjacent to other LTA designations. This would allow fields that consist of a 30-acre lot and a nine acre lot to be designated and protected.
- Adopt better regulations to protect farmland from McMansions and incompatible uses.

Thank you for all you do and for your consideration.

Sincerely,  
Liz Schotman  
1105 Fenske Dr. NE  
Olympia, WA 98506

**From:** [Judy Le Blanc](#)  
**To:** [Maya Teeple](#)  
**Subject:** Input on Chapter 3 - Comp Plan Updates - LTA  
**Date:** Monday, June 19, 2023 5:01:38 PM

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My Name is: Judy LeBlanc from Seattle

I am very concerned about the loss of farmland in general and specifically with the loss in Thurston county.

Please adopt these updates to the Comp Plan.

Please approve designating more acres as Long-Term Agriculture (LTA) by updating the soils criteria.

Swiftly identify funding sources to compensate landowners for the lost land value (lost development rights) from LTA designation.

Include smaller parcels in the LTA designation when they meet adjacent to other LTA designations and with prime ag soils. This would include, for example, a nine-acre parcel between two 20- or 40- acre parcels to be designated and protected.

Consider farmland of statewide importance soils for designation as Long-Term Agriculture (LTA) if they meet the other criteria.

Add a new policy that would permit landowners with parcels outside the LTA zones, but with prime soils or soils of statewide significance to voluntarily permanently change their zoning to preclude subdividing the parcel.

thank you for consideration of this request

Judy LeBlanc

**From:** [Timothy Leadingham](#)  
**To:** [Maya Teeple](#)  
**Subject:** Protect Thurston County Farms  
**Date:** Monday, June 19, 2023 5:18:36 PM

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County Staff and Planning Commissioners,

Thurston County has lost too much of our valuable farmland. Between 2012 and 2017, Thurston County has lost 14,388 acres of land in farms. During that same period net farm income increased by 81 percent to \$28,195,000. Conserving our working farms helps produce high quality local food, protects the environment, and is good for the economy.

I urge you to:

- Recommend approval of the new policies and regulations for the designation and conservation of working farms in Thurston County including considering all prime farmland soils for designation as Long-Term Agriculture (LTA) if they meet the other criteria.
  - Recommend designating farmland of statewide importance soils for as Long-Term Agriculture (LTA) if they meet the other criteria.
  - Include parcels smaller than 20 acres in the Long-Term Agriculture (LTA) designation when they meet the County's criteria and are adjacent to other LTA designations. This would allow fields that consist of a 30-acre lot and a nine acre lot to be designated and protected.
  - Adopt better regulations to protect farmland from McMansions and incompatible uses.
- Although the conservation of working farmland is very important for the above reasons, the conservation of forestland is even more important for achieving the county's goal of increasing carbon sequestration by 375,000 tons of CO<sub>2</sub>e by 2050(TCMP, 2022). Improved conservation of agricultural soils and prairie restoration could add 50,000 tons of that, but forest conservation and reforestation are necessary to achieve the remaining 325,000 tons per year by 2050. I urge you to also consider in your plan the conservation of up to 40,000 acres of private forestland which could be threatened by development if zoning decisions allow it. This could be done through a program of conservation easements, acquisition, and carbon credit enrollments under the CCA program.

Thank you for considering my comments.

Sincerely,  
Timothy Leadingham  
3624 4th Ave NW  
Olympia, WA 98502

**From:** [kenbonniemiller@gmail.com](mailto:kenbonniemiller@gmail.com)  
**To:** [Ashley Arai](#); [Maya Teeple](#)  
**Subject:** FW: "Agriculture Zoning Change" Public Hearing: June 21  
**Date:** Monday, June 19, 2023 10:09:59 PM

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Ashley & Maya:

Please forward this heartfelt public testimony to the Planning Commission as soon as possible in hopes they will read before the Public Hearing Wed evening. I do plan to testify in person, but 3 minutes isn't near enough to cover all this topic from a landowner perspective.

**6/19/2023**

**Members of the Thurston County Planning Commission:**

We are Ken and Bonnie Miller, residents of Thurston County for over 30 years. I was on the Ag Advisory Committee for 10 of those years. We have accumulated 108 acres between Scott Lake and Millersylvania State Park (no relation). We live on the farm and have spent the bulk of the last 30 years rehabilitating this property and have all, but 2 acres enrolled in Designated Forestland. About 96 of those acres are on one scenario or the other for potential rezoning to long-term "Agriculture". While there are some scenarios below that we might not find objectionable, we have several concerns and suggestions to help improve your recommendations to the Commissioners. We've divided these thoughts into 3 buckets: A **Reality Check** on the facts in play on this topic; comments and suggestions about **Fairness to All Landowners**; and some factors **Pertinent to Ken and Bonnie Miller and Our Land**.

**Reality Check:**

1. We do not believe forestland owners have been effectively notified of the potential zoning change on their lands! The Public Notices re: "Agriculture Zoning" inadvertently misleads those of us with Designated Forestland into believing this only about Agriculture land leading many we believe to disregard the County Notices as not being applicable to their land. We don't believe forestland owners were on the Stakeholder Group meetings so weren't represented in the early formation of the current proposals. We don't fault County staff, just part of the natural confusion between Ag and Forestry. . . in fact Ashley did eagerly host a last minute meeting with the few folks we got interested in a quick meeting, although its doubtful our Washington Farm Forestry Association touched a significant portion of forestland owners who met the criteria for long-term Ag. More effective outreach is needed if forested lands remain in the criteria for eligibility.
2. We believe forested parcels should not be in the pool of potential long term "Agriculture Zoning" by definition! At the Federal level Forestry is included in the Dept of Agriculture, and we believe likewise in some other important classifications. However, Forestry is not listed in the relevant state WAC 365-190-030 definition for Agriculture so: How is it that our lands are even being considered for Ag designation and Zoning? It's my understanding that about 30% of those parcels in the current scenarios are clearly forested parcels. The public and most landowners see them as entirely different land uses – further supporting our assertion that effective public notice has not been given to those forestland owners with parcels fitting the proposals current criteria.

[WAC 365-190-030](#) - Definitions

“(1) "Agricultural land" is land primarily devoted to the commercial production of horticultural, viticultural, floricultural, dairy, apiary, vegetable, or animal products or of berries, grain, hay, straw, turf, seed, Christmas trees, not subject to the excise tax imposed by RCW 84.33.100 through 84.33.140, finfish in upland hatcheries, or livestock, and that has long-term commercial significance for agricultural production. These lands are referred to in this chapter as agricultural resource lands to distinguish between formally designated lands, and other lands used for agricultural purposes.”

3. Housing and Forestry can be compatible land uses, even in RRR 1/5 zoning that still protects “Resources” so further downzones for timberland serves no functional purpose for those of us with forestland.
4. Without compensation, rezoning would be a huge “taking” of property rights affecting 12-22,000 acres now in RRR 1/5
5. If not rezoned the proposal would unfairly require cluster housing on large parcels now zoned RRR 1/5 without incentives or compensation– another variety of “taking” that seems beyond the requirements of the legal proceedings with Futurewise.
6. Lands with Ag soils but no water rights for irrigation cannot reasonably qualify for “Commercially Significant Agriculture.” At a minimum no land should be zoned long term Agriculture unless it has soils capable **without irrigation** of producing crops at “commercially sustainable levels for at least the twenty-year planning period”. At least for those landowners objecting to downzoning in part due to no irrigation rights, the soils criteria should only apply to soils capable of commercially significant agriculture without irrigation according to the Land Capability Classification System. All lands not currently being irrigated must be presumed to not have any water rights to be a credible proposal from the Planning Commission. Likewise, some of us on your potential lists have wetlands that aren’t suitable for agriculture unless they are drained which isn’t allowed any more than getting new water rights so county classified wetlands should automatically not be on your criteria list of potential new long term agriculture zoning, if the Planning Commission proposals are to have any credibility. **Think about it:** If the current large lots are not currently actively engaged in agriculture, doesn’t that say those lands are mostly likely not suitable for any commercially viable agriculture, let alone sustainable for 20 years? Economic viability for “commercial” ag (like everything else) require economies of scale not available on farms smaller than couple hundred acres. Small fleeting niche markets are romantic/nostalgic but obviously aren’t “commercially significant”! I’d bet a lot that few/if any of the current average “agriculture” parcel sizes of 15.5 acres is remotely close to being commercial (make a profit), or “significant”. Hobby farms (Ag or Forestry) &/or those mainly just taking advantage of current use taxation programs certainly don’t come close to “commercially significant” now or ever in the future.

[WAC 365-190-030](#) - Definitions

“(11) "**Long-term commercial significance**" includes the growing capacity, productivity, and soil composition of the land for long-term commercial production, in consideration with the land's proximity to population areas, and the possibility of more intense uses of land. **Long-term commercial significance means the land is**

**capable of producing the specified natural resources at commercially sustainable levels for at least the twenty-year planning period if adequately conserved.**

Designated mineral resource lands of long-term commercial significance may have alternative post-mining land uses, as provided by the Surface Mining Reclamation Act, comprehensive plan and development regulations, or other laws.”

Wanting more long-term Agriculture lands for societal reasons isn't sufficient reasoning to qualify land as "Long-term commercial significance"!

7. **Your criteria for long-term Agriculture parcels should be at least 100 acres and have at least 75% prime farmland soils that are actually farmable without irrigation to be commercially significant, if then!** – otherwise it would seem a simple “taking” without any sort of reasonable cost/benefit rationale.

### **Fairness to All Landowners**

1. A responsible and respectful government of the people will seek win-wins by identifying which landowners are potentially ok with downzoning because that fits in their long-term plans for the property. The County should also seek to find win-win ways to accommodate those who will suffer financially due to potential downzoning.
2. Thurston is the first county in the state to have a “Transfer of Development Rights” program intended to treat landowners fairly and in a way that also increased potential resource lands for the future. Before “taking rights” Thurston County should work with legislators & even Futurewise (who are also trying to reduce housing costs by increasing density in our urban area’s) to facilitate TDRs – ask the legislature to incentivize cities to accept development rights from the rural area’s creating a win-win scenario that gets increased density in some places, and reduced density in other places as envisioned in the Growth Management Act? Be proactive!
3. Thurston County is buying development rights from landowners to better protect Pocket Gophers, and Oregon Spotted Frogs. Is the County going to remove most of our development rights on these lands before they offer to purchase the few remaining rights in those area’s? Why should one development right be purchased, and others simply taken? Respect your rural folks by recommending voluntary win-win methods to meet your goals.
4. We believe Thurston Co. used Conservation Futures to purchase development rights in the Nisqually area – you should recommend using Conservation Futures &/or other funding sources to make it right for those negatively affected by a mandatory reduction in development rights, even if it means increasing the Conservation Futures tax rates. At least for this mandatory loss of development rights the County should be also able to negotiate reasonable homesite valuations directly with the landowner!
5. Despite what the soil maps show, some lands simply aren’t “. . . capable of producing the specified natural resources at commercially sustainable levels. . . .” so **YOU MUST INCORPORATE A PATHWAY TO EXCLUSION VIA MEANINGFUL GROUND TRUTHING IN A LANDOWNER FRIENDLY PROCESS!**
6. We understand and appreciate that parts of this proposal will rightly help some folks already in long term agriculture – you can help the viability of existing long-term Ag folks without hurting the rest of us in the process. It feels like the Ag Advisory Committee is throwing some landowners under the bus, to increase their own farming rights . . . . I hope that’s not true.
7. This whole process started with a misguided effort by Futurewise that eliminated a superb

“cluster development” program that was voluntarily creating lots of permanently conserved resource parcels (that I reviewed for the 10 years I was on the Ag Advisory Committee). It’s one thing to lose that great cluster development bonus win-win option, but your current proposal brings “cluster” developments back, but without the housing unit bonus. . . . simply punishing/“taking” from those of us that might escape the rezoning efforts on our remaining RRR 1/5 zoning . . . without cause or benefit from what we can see. If the County can’t provide a housing unit bonus for clustering, they certainly could offer other incentives such as expedited permitting, reduced fee’s/taxes, or other incentives to help increase the size of our resource parcels. Incentives and volunteerism create the best lasting outcomes for all – Don’t recommend proposals that have winners and losers, only recommend win-win options for the Commissioners!

8. **Based on past and current precedents it seems you have a moral obligation to recommend compensation/incentives to landowners affected by future downzoning decisions made by the Commissioners.**

### **Pertinent to Ken and Bonnie Miller and Our Land**

1. Our adjoining parcels are all fully stocked with timber and enrolled in the Designated Forest current use taxation program, arguably doing more for the environment, critters, and public resources than if our land was in commercially significant agriculture.
2. We’ve spent about 30 years accumulating the Thurston land we have, paying full development value prices. We have been voluntarily doing the right things for the public resources on our land. We &/or our heirs will be financially harmed if the County reduces our property values via any of these proposals’ w/o compensation – that’s not right – that send messages to others like us to develop your land as quick as you can before the county takes away your rights, just the opposite of your intentions.
3. We would be interested selling a portion of our development rights to further ensure forested landscapes for generations to come.
4. One of our parcels potentially impacted has a significant amount of wetlands/forested wetlands, much of which can’t even support timber, let alone “commercially significant agriculture”.
5. We are also adjacent to Millersylvania State Park. . . . a buffer between the Park and the Scott Lake Community. . . . good neighbors to both! Converting any of our lands to any other form of agriculture would not be nearly as compatible with either the Park or the Scott Lake Community.
6. You must include provisions to ground truth the applicability of any parcels selected by your ultimate criteria in a process that is both fair to the landowners and most importantly truthful to the stated intent to conserve more commercially significant lands that could really be used for long-term agriculture as defined in [WAC 365-190-030](#) (1) & (11).

Forest land owners were not effectively notified of this potential action; converting some lands according to the current criteria is non-sensical at best; “taking” our property value without compensation is wrong. . . and discriminatory compared to how other owners land values have/are similarly been reduced; you have a responsibility to treat the landowners and the resources fairly . . . both can be accomplished with a little more effort/pro-active thinking in the final proposals; please show landowners that you care about those of us that have protected our open spaces all these

decades.

We are eager to help your understanding of more options - thank you for considering our concerns and proposals seriously.

Ken and Bonnie Miller  
11834 Family Forest Ln SW  
Olympia, WA 98512  
Cell 360-999-8595

**From:** [Kimberly Abbey](#)  
**To:** [Maya Teeple](#)  
**Subject:** Input on Chapter 3 - Comp Plan Updates - LTA  
**Date:** Tuesday, June 20, 2023 11:33:36 AM

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My Name is: Kim Abbey, from [CITY]  
My Email Address is: [kabbey48@gmail.com](mailto:kabbey48@gmail.com)

Please approve designating more acres as Long-Term Agriculture (LTA) by updating the soils criteria.

Swiftly identify funding sources to compensate landowners for the lost land value (lost development rights) from LTA designation.

Include smaller parcels in the LTA designation when they meet adjacent to other LTA designations and with prime ag soils. This would include, for example, a nine-acre parcel between two 20- or 40- acre parcels to be designated and protected.

Consider farmland of statewide importance soils for designation as Long-Term Agriculture (LTA) if they meet the other criteria.

Add a new policy that would permit landowners with parcels outside the LTA zones, but with prime soils or soils of statewide significance to voluntarily permanently change their zoning to preclude subdividing the parcel.

**From:** [Christy Bear](#)  
**To:** [Maya Teeple](#)  
**Subject:** Input on Chapter 3 - Comp Plan Updates - LTA  
**Date:** Tuesday, June 20, 2023 11:43:05 AM

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My Name is: Christy Bear, from Bellevue  
My Email Address is: [christy2@softbear.com](mailto:christy2@softbear.com)

Please approve designating more acres as Long-Term Agriculture (LTA) by updating the soils criteria. Swiftly identify funding sources to compensate landowners for the lost land value (lost development rights) from LTA designation.

Include smaller parcels in the LTA designation when they meet adjacent to other LTA designations and with prime ag soils. This would include, for example, a nine-acre parcel between two 20- or 40-acre parcels to be designated and protected.

Consider farmland of statewide importance soils for designation as Long-Term Agriculture (LTA) if they meet the other criteria.

Add a new policy that would permit landowners with parcels outside the LTA zones, but with prime soils or soils of statewide significance to voluntarily permanently change their zoning to preclude subdividing the parcel.

We must choose to act Boldly now, before we lose more precious farmland.

~Christy

**From:** [Ashley Arai](#)  
**To:** [Maya Teeple](#)  
**Subject:** Fwd: Agriculture Zoning Update - More Info  
**Date:** Tuesday, June 20, 2023 11:58:30 AM

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It looks like I didn't send it. Sorry!

Sent from my iPhone

Begin forwarded message:

**From:** Ashley Arai <[ashley.arai@co.thurston.wa.us](mailto:ashley.arai@co.thurston.wa.us)>  
**Date:** June 18, 2023 at 8:06:00 AM PDT  
**To:** [andy@ourevolution.com](mailto:andy@ourevolution.com)  
**Subject:** RE: Agriculture Zoning Update - More Info

Hello Andy,

Thank you for taking the time to provide thoughtful feedback on the Agriculture zoning update proposal. In response to your specific questions:

1. The change in zoning would not affect any current mining operations. Mineral extraction is considered a special use in the Long-Term Ag zone, similar to the RRR 1/5 or RR 1/10 zones.
2. I would defer to NRCS for site-specific information on soils mapping. We have received one other public comment from a mining operation that indicated the soils had changed. This and any other site-specific soils information will be shared with the Planning Commission for their consideration.
3. The current mapping scenarios do not include any land within an Urban Growth Area. If a city was proposing to expand an Urban Growth Area though, the zoning would be reviewed to ensure consistency with the Comprehensive Plan and respective Joint Plans.

I hope this information is helpful Please don't hesitate to reach out if you have any further questions or thoughts to share.

Kindest regards,

Ashley

**Ashley Arai** | Agriculture Community Program Manager  
**Thurston County Community Planning & Economic Development**  
**Community Planning Division**  
3000 Pacific Ave SE, Olympia, Washington 98501  
**Cell (Primary):** (360) 280-9298  
[Ashley.Arai@co.thurston.wa.us](mailto:Ashley.Arai@co.thurston.wa.us) | [www.thurstonplanning.org](http://www.thurstonplanning.org)

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**From:** andy@ourevolution.com <andy@ourevolution.com>

**Sent:** Friday, June 16, 2023 12:20 PM

**To:** Ashley Arai <ashley.arai@co.thurston.wa.us>

**Subject:** RE: Agriculture Zoning Update - More Info

Hello Ashley and thank you very much for taking the time to meet with us the other night. Also, thank you for the links you provided for more information. In digging through the maps, we noted that we have three potentially affected properties under LTA Scenario #2. These parcels are:

1. APN 11706310000
2. APN 11706310100
3. APN 11706320100

With that said, we have some questions/comments regarding these properties.

1. All of these properties are within the existing operational footprint of Alpine Sand & Gravel. How would any rezone affect this use?
2. Does the fact that these properties have been mined affect the accuracy of the NRCS soils mapping?
3. If the City of Olympia annexes these properties, what, if any, potential impacts would be expected with the County's LTA zoning?

General comments that could be shared with the planning commission:

1. Request that the mapping includes information from the assessor's office of whether the target properties are currently taxed as designated forest lands. I believe you had more appropriate language for this comment. Any advice would be appreciated. I would encourage the commission to "filter out" any lands that are currently in designated forest land as the future use seems obvious with 50-60 year harvest cycles.
2. I would also encourage the commission to consider how fast this area is growing and where... setting aside lands that are adjacent to rapidly expanding rural areas, (93<sup>rd</sup> industrial properties being developed, therefore Littlerock Road from Tumwater Blvd to 110<sup>th</sup>-ish seem to be in play for necessary housing), etc.
3. I support what I heard the other night... if re-zoning reduces a landowners development rights, it would seem that the County would be responsible for compensating landowners for the loss. What, if any, plans are there for compensation?

Thanks again for your time and expertise. Very much appreciated the frank, honest meeting.

Andy

Andy Sorter, P.E.

Principal Engineer  
OurEvolution Engineering, Inc.  
Mobile: 360.791.3259  
Office: 707.633.4210



District Engineer  
Mason Conservation District

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**From:** Ashley Arai <[ashley.arai@co.thurston.wa.us](mailto:ashley.arai@co.thurston.wa.us)>  
**Sent:** Wednesday, June 14, 2023 9:00 PM  
**To:** [kenbonniemiller@gmail.com](mailto:kenbonniemiller@gmail.com); [yoandpa@hotmail.com](mailto:yoandpa@hotmail.com); [alcain@comcast.net](mailto:alcain@comcast.net);  
[john.edward.grenier@gmail.com](mailto:john.edward.grenier@gmail.com); [andy@ourevolution.com](mailto:andy@ourevolution.com); [massapfor@yahoo.com](mailto:massapfor@yahoo.com)  
**Cc:** Maya Teeple <[maya.teeple@co.thurston.wa.us](mailto:maya.teeple@co.thurston.wa.us)>  
**Subject:** Agriculture Zoning Update - More Info

Hello,

Thank you all again for taking time out of your evening to learn more about the County's Agriculture Zoning Update. I appreciated our conversation and am happy to answer any follow-up questions. Here are some additional resources I mentioned that provide more detailed info:

[Project Webpage](#): This webpage has an overview of the project and a searchable [online map](#).

[Planning Commission Webpage](#): This webpage has materials from our last two work sessions on May 3 and May 17, as well as the upcoming hearing on June 21. Written comments are due at noon on the 21<sup>st</sup> or you can share your feedback with the Planning Commission during the 7:00 hearing (in person or via Zoom). At the bottom of the page you will also find the roster.

Kindly,

Ashley

**Ashley Arai** | Agriculture Community Program Manager  
**Thurston County Community Planning & Economic Development  
Community Planning Division**  
3000 Pacific Ave SE, Olympia, Washington 98501  
**Cell (Primary):** (360) 280-9298  
[Ashley.Arai@co.thurston.wa.us](mailto:Ashley.Arai@co.thurston.wa.us) | [www.thurstonplanning.org](http://www.thurstonplanning.org)

**From:** [Robert McIntosh](#)  
**To:** [Maya Teeple](#); [Ashley Arai](#)  
**Subject:** Comments for June 21 Planning Commission Hearing on Long Term Agriculture Zoning Update  
**Date:** Tuesday, June 20, 2023 5:24:27 PM

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My name is Robert McIntosh. I, along with my wife Marion and sons Brian and Colin, are the owners of McIntosh Tree Farm, an 1189 acre family tree farm in the Deep Lake/Maytown/Millersylvania area. Our tree farm has now been in our family for five generations, beginning in the 1890s; the first member of the sixth generation is scheduled to arrive in September. As a family, we are deeply committed to preserving our land in its undeveloped state for many generations to come. We are submitting these comments in our capacity as tree farm owners, and not in Robert's capacity as a member of the Thurston County Agriculture Advisory Committee.

We fully concur with the proposals to expand the amount of County land designated for long term agriculture, even though a substantial part of our tree farm is proposed to be added to that designation. We are deeply concerned about the accelerating loss of County farmland and believe that expanding our long term agriculture zoning is an important tool in slowing our rate of farmland loss. While much more needs to be done to preserve our remaining farm and forest land, we think this is an important first step.

We have mixed feelings about adding forest land such as ours to the long term agriculture designation. We would indeed be sad to see our forest land converted to farming use at some future time, because we think that forest land is wilder, more beautiful, provides more habitat, and captures more carbon than farmland. But we recognize that at some point our need for local farmland may require the conversion of some of our forest land to cropland. We recognize that timber from British Columbia is probably as good as timber from Thurston County, but that a pig from Iowa or lettuce from Mexico is not nearly as good as a pig or lettuce from Thurston County. We ask only that conversion of County forest land to farmland be done only as a last resort, after all other strategies for farmland preservation have been exhausted.

We do, however, want to express our strong belief that smaller tree and crop farmers whose land is downzoned to preserve agriculture in Thurston County should be compensated for their loss of development rights. It is patently unfair to preserve farmland at the sole expense of these smaller farmers, who already work long hours with low financial returns to provide local timber, crops, and livestock. If we, as a county, value local timber, crops, and livestock, then all of us, as a county, should pay the cost of preserving the lands these products are grown on. King County has passed a bond issue for just this purpose; Thurston County, or the entire state of Washington, should do the same.

Thank you for this opportunity to comment!

Robert, Marion, Brian, and Colin McIntosh

**From:** [Oysterbayfarm](#)  
**To:** [Maya Teeple](#)  
**Cc:** [Pat Labine](#)  
**Subject:** Changes to criteria for LTA designation  
**Date:** Tuesday, June 20, 2023 6:19:51 PM

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I serve on the County Agriculture Advisory Committee and on the Board of the Community Farm Land Trust. I am aware of the discussions that are leading to changes in LTA designations. I am totally in support of any changes that increase the probability of farmland being preserved for future food production. The importance of local food self-reliance cannot be over emphasized in times of political, economic and climate uncertainty.

More specifically, I would like to give my support to the position put forward by the League of Women Voters, among others, that an update to the Comprehensive plan examine the current exclusion from LTA designation of lands within the McAllister Springs aquifer recharge area. These are the areas south of the Yelm Highway consisting of large tracts of turf and berry production. I live out in that area and know these soils very well. They are some of the best in the country and have been designated by the American Farmland Trust as soils of national significance. It is also important to recognize that these extensive tracts have established water rights. Water rights are a precious agricultural “resource” and if not used, are lost and cannot be reclaimed.

Presumably the existing exclusion from LTA designation is based on concern for past contamination of groundwater from pesticide and fungicide use. I would like to argue that pesticide are now much more tightly regulated, especially those known to affect ground water. Further more, I would be much more concerned about ground water contamination if those properties were to be developed into tract housing with all the associated road residue run-off, lawn chemical use (unregulated ...) and septic system leakage.

Thank you for your consideration, Pat Labine, Fido Farm  
9829 Evergreen Valley Rd  
Olympia, WA. 98503

Sent from my iPad

**From:** [Steve Giesecke](#)  
**To:** [Maya Teeple](#)  
**Cc:** [couloir@comcast.net](mailto:couloir@comcast.net)  
**Subject:** RE: Agriculture Zoning Proposal  
**Date:** Tuesday, June 20, 2023 6:48:37 PM  
**Attachments:** [image001.png](#)  
[Thurston County GeoData Center Soils and Groundwater Map Info - PN 13934210000 \(01\).pptx](#)

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Maya –

Thurston County mapped parcel 13934210000 as hydric soil and high ground water hazard land. As such (please see attached extracts of Thurston County GeoData for this parcel and relevant hydric soil information), it is unsuitable for agriculture.

I cannot even walk to the end of my property (i.e. this parcel) due to the danger from sinkholes filled with water throughout the year. I tried to do so once and almost drowned (and I was a lifeguard when I was young). The water table is at/above the surface year round.

Thurston County correctly identified this parcel as wetland/wetland buffer, in addition to the hydric soil designation. Wetland and Hydric soils are mutually supporting. And, according to Thurston County Environmental Ordinances, wetlands cannot be graded, filled or disturbed by machinery for farming or other purposes. Even if such practices were allowed, they would not be economically feasible in a permanent marsh that has multiple inlets but no outlets.

Please see the attached Powerpoint that focuses specifically on this parcel, applying Thurston County GeoData for soils and high groundwater hazards.

This parcel needs to be removed from consideration under Scenario 2, or any of the options under consideration. It is obvious Thurston County simply swept up all parcels of a certain size that don't have any bldg. structures and lumped them into this program, regardless of their ecological suitability for realistic and sustainable agriculture.

Sincerely,

Stephan Giesecke  
4625 Oyster Bay Rd NW  
Olympia, WA 98502  
(360) 561-3803

---

**From:** Maya Teeple <[maya.teeple@co.thurston.wa.us](mailto:maya.teeple@co.thurston.wa.us)>  
**Sent:** Monday, June 19, 2023 3:17 PM  
**To:** Steve Giesecke <[couloir@comcast.net](mailto:couloir@comcast.net)>  
**Subject:** RE: Agriculture Zoning Proposal

Hi Stephan,

Thank you for submitting your comment. It will be included on the record and forwarded to the Commissioners for their consideration.

Kindly,

Maya



**Maya Teeple** (She/Her) | **Senior Planner**  
**Thurston County Community Planning & Economic Development**  
**Community Planning Division**  
3000 Pacific Ave SE, Olympia, Washington 98501  
**Cell (Primary):** (360) 545-2593  
[Maya.Teeple@co.thurston.wa.us](mailto:Maya.Teeple@co.thurston.wa.us) | [www.thurstonplanning.org](http://www.thurstonplanning.org)

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**From:** Steve Giesecke <[couloir@comcast.net](mailto:couloir@comcast.net)>  
**Sent:** Monday, June 19, 2023 2:53 PM  
**To:** Maya Teeple <[maya.teeple@co.thurston.wa.us](mailto:maya.teeple@co.thurston.wa.us)>  
**Subject:** Agriculture Zoning Proposal

June 19, 2023

Good morning Ms Teeple:

I am a Thurston County property owner who received your postcard indicating my property (P/N 13934210000) may be affected by subject program.

This parcel is currently zoned residential and is classified as undeveloped land. The Thurston County Planning and Permits Dept (now called the "Building Development Center") recently told me that it could be developed by going through the environmental impact/reasonable use exception process.

This meeting and its conclusions was documented.

As such, the land, which I just purchased last year, has considerable value and I have received written offers attesting to this.

I have some initial questions:

First, is my property affected by the proposed zoning change?

If the answer to this question is "yes," then please explain how the county will compensate land owners for a rezoning that considerably lessens the value of their property. Rezoning from "residential" to "agriculture" will essentially destroy the value of the property.

Civil law, which is replete with relevant precedent case history, provides for property owners to be reimbursed for unilateral Government actions that reduce or adversely affect the value of their land,

the cost [reduction] which can be proven (e.g. based on current written offers for purchase of said property; market value of similar property sales zoned as residential vs agricultural, etc). Court cases that are won by the property owner also typically stipulate that the cost of legal services procured by impacted property owners be paid for by the Government (i.e. the County in this case).

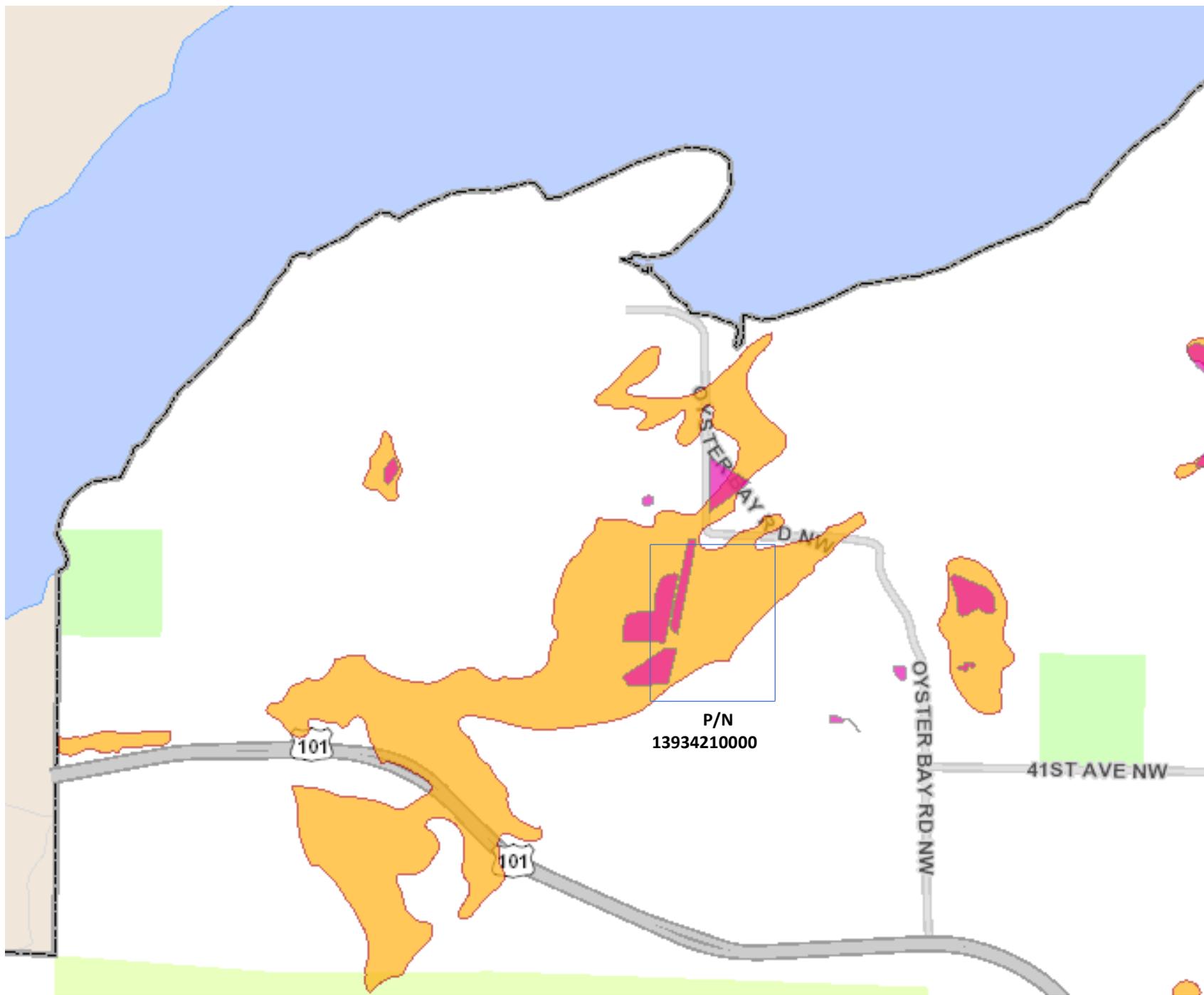
Sincerely

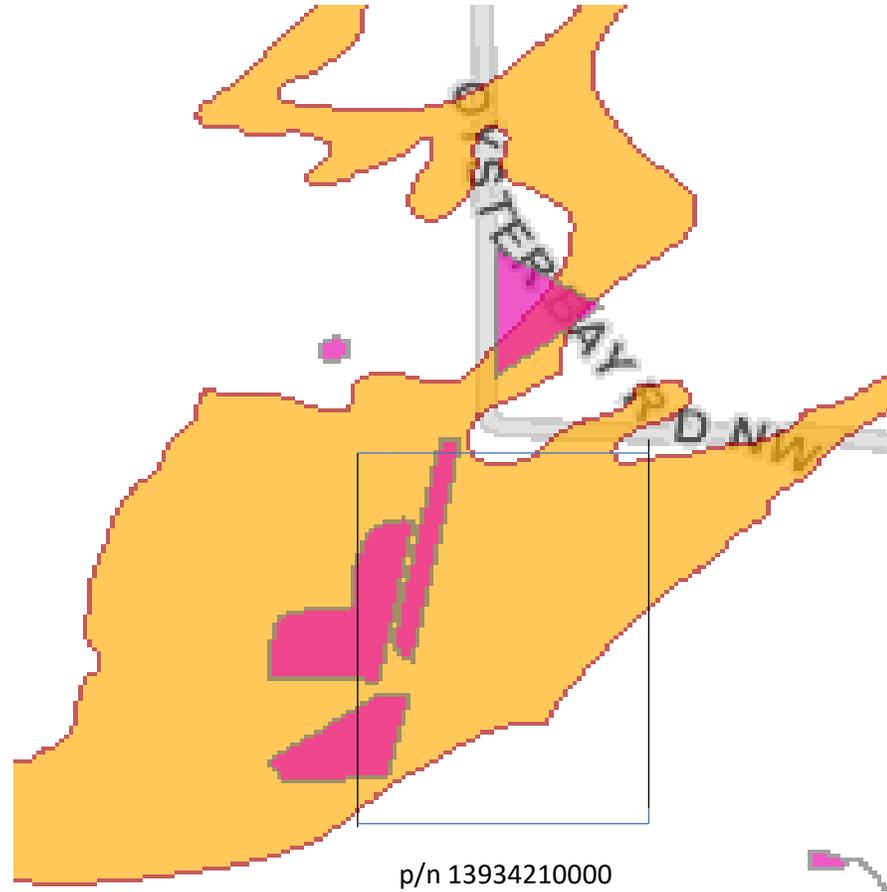
Stephan Giesecke  
4625 Oyster Bay Rd NW  
Olympia, WA 98502  
(360) 561-3803

Source: Thurston County  
GeoData Center Permitting  
Map

 = Hydric Soils

 = High Groundwater  
Hazard Areas





 = Hydric Soils

 = High Groundwater Hazard Areas

# Hydric Soils!

- Formation influenced by interactions of soil-forming factors, but overriding factor is water
- Hydric soils
  - soil that formed under conditions of saturation, flooding or ponding long enough during the growing season to develop anaerobic conditions in the upper part.



# Hydric Soils and Parcel 13934210000

- Thurston County correctly mapped P/N 13934210000 as hydric soil land (see Thurston County GeoData for this parcel – extracted/presented in the above slides) – the soil is inundated and the parcel's water table is at/above the surface most of the year
- Hydric soil indicators/characteristics are based on biogeochemical processes that occur when soils are saturated or inundated with water and the resulting biochemistry that occurs
- Hydric soil and wetlands go hand in hand: hydrophytic vegetation (e.g. plants that have adapted to survive in oxygen challenged aquatic environments) are the principal plants that can reliably grow in hydric soil environments. These are aquatic plants such as cattails, sedges and water lilies.
- Hydric soils do not have sufficient oxygen to develop or grow crops for agricultural purposes
- Parcel 13934210000 is a wetland superimposed on/with hydric soils (they are mutually supporting ecologies) and is NOT SUITABLE FOR AGRICULTURE AS DEFINED AND MAPPED BY THURSTON COUNTY
- **The Land is a Marsh**

# Can you develop or grow crops on Hydric Soil?

- “If you purchase land to build, develop or grow crops, then you must be aware of where the hydric soils are. These soils do not have enough oxygen. While you may be able to grow cattails, sedges, and water lilies, you won’t be able to farm or use the land as you otherwise intend.”

- “What is Hydric Soil? 10 Things you should know in 2023.

Gokce Capital (<https://gokcecapital.com>)

**From:** [Sherry Buckner](#)  
**To:** [Maya Teeple](#); [Ashley Arai](#)  
**Subject:** Incoming Comment Ag Project  
**Date:** Tuesday, June 20, 2023 7:36:08 PM

---

## You got a new response!

**Name:**  
Sherry Buckner

**Email:**  
[bucknersherry@hotmail.com](mailto:bucknersherry@hotmail.com)

**Comment:**

Hello,

I would like to submit a comment on the subject of Land Use as it pertains to Agriculture Lands in Thurston County. Specifically the wetlands that exist on prime farmland soils and the habitat of Oregon Spotted Frogs.

I live next door to a very large farm that has Oregon Spotted Frog breeding sites within close range and many wetland areas on the farm that are successful habitats for these frogs. What I have observed is that the health of the soil and surrounding land is connected to the health of the Oregon Spotted Frog habitat. The water levels and disturbance of these wet areas are an indicator for down land pollution and flooding, if these areas are changed, disturbed or attempts are made to mitigate them. In addition, I have witnessed areas where the wetlands were mitigated in attempt to develop or change the nature of the land, and this has backfired by flooding the surrounding neighbors. The sites where Oregon Spotted Frogs exist seem to often be spring fed, high ground water, or other annual seasonal flooding prone sites. When attempts are made to get rid of them, it simply fails. The sites are important and function as natural protections to flooding elsewhere - where it is unwanted and unhealthy and they serve as ways that nature processes the cycles of dry vs flooding months of the year. It is utter foolishness and ends in trouble and lawsuits for cities, developers and land owners to fail to protect these areas and their surrounding buffers.

In addition, as of 2014 - 12 frog soil types were also on prime farmland.

Adding more agriculture land in Thurston County seems like a wise long term investment in the health of the county. More food abundance here and near and more healthy open space benefits everyone.

My understanding is that critical areas ordinances for Rural Residential and Long Term Agriculture areas differ. I would suggest that strong protections for the health of the land and the Oregon Spotted Frog be administered. I believe all protections for the health of species is always best for humans too.

The Washington Department of Fish and Wildlife states:

Avoid draining prime soils occupied by Oregon Spotted Frogs.

see; <https://wdfw.wa.gov/sites/default/files/publications/00025/wdfw00025.pdf>

We love our farmlands!

thank you,

Sherry Buckner

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Time: June 20, 2023 at 11:36 pm

IP Address: 75.172.87.56

Source URL: <https://thurstoncomments.org/comment-on-ag-project/>

Sent by an unverified visitor to your site.

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**From:** Mike McCormick  
**To:** [Maya Teeple](#)  
**Subject:** Protect Thurston County Farms  
**Date:** Tuesday, June 20, 2023 10:34:40 PM

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County Staff and Planning Commissioners,

Thurston County has lost too much of our valuable farmland. Between 2012 and 2017, Thurston County has lost 14,388 acres of land in farms. During that same period net farm income increased by 81 percent to \$28,195,000. Conserving our working farms helps produce high quality local food, protects the environment, and is good for the economy.

I urge you to:

- Recommend approval of the new policies and regulations for the designation and conservation of working farms in Thurston County including considering all prime farmland soils for designation as Long-Term Agriculture (LTA) if they meet the other criteria.
- Recommend designating farmland of statewide importance soils for as Long-Term Agriculture (LTA) if they meet the other criteria.
- Include parcels smaller than 20 acres in the Long-Term Agriculture (LTA) designation when they meet the County's criteria and are adjacent to other LTA designations. This would allow fields that consist of a 30-acre lot and a nine acre lot to be designated and protected.
- Adopt better regulations to protect farmland from McMansions and incompatible uses.

Thank you for considering my comments.

Sincerely,  
Mike McCormick  
2420 Columbia St SW  
Olympia, WA 98501

**From:** [Janae Huber](#)  
**To:** [Maya Teeple](#)  
**Subject:** Protect Thurston County Farms  
**Date:** Wednesday, June 21, 2023 12:22:41 AM

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County Staff and Planning Commissioners,

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- Adopt better regulations to protect farmland from McMansions and incompatible uses.

Thank you for considering my comments.

Sincerely,  
Janae Huber  
2612 Buker St SE  
Olympia, WA 98501

**From:** [Kathy McCormick](#)  
**To:** [Maya Teeple](#)  
**Subject:** Protect Thurston County Farms  
**Date:** Wednesday, June 21, 2023 12:26:42 AM

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County Staff and Planning Commissioners,

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- Adopt better regulations to protect farmland from McMansions and incompatible uses.

Thank you for considering my comments.

Sincerely,  
Kathy McCormick  
2420 Columbia St SW  
Olympia, WA 98501

**From:** [OLIVER STORMSHAK](#)  
**To:** [Maya Teeple](#)  
**Subject:** Protect Thurston County Farms  
**Date:** Wednesday, June 21, 2023 12:42:39 AM

---

County Staff and Planning Commissioners,

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- Adopt better regulations to protect farmland from McMansions and incompatible uses.

Thank you for considering my comments.

Sincerely,  
OLIVER STORMSHAK  
108 CHERRY ST NE  
Olympia, WA 98501

**From:** [Kim Murillo](#)  
**To:** [Maya Teeple](#)  
**Subject:** Protect Thurston County Farms  
**Date:** Wednesday, June 21, 2023 1:32:41 AM

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County Staff and Planning Commissioners,

Thurston County has lost too much of our valuable farmland. Between 2012 and 2017, Thurston County has lost 14,388 acres of land in farms. During that same period net farm income increased by 81 percent to \$28,195,000. Conserving our working farms helps produce high quality local food, protects the environment, and is good for the economy.

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- Adopt better regulations to protect farmland from McMansions and incompatible uses.

Thank you for considering my comments.

Sincerely,  
Kim Murillo  
222 Central St. N. East  
Olympia, WA 98506

**From:** [Marcie Cleaver](#)  
**To:** [Maya Teeple](#)  
**Subject:** Written Comments regarding Agriculture Zoning  
**Date:** Wednesday, June 21, 2023 2:33:25 AM  
**Attachments:** [Planning Commision thoughts from meeting submitted to County Planning Commission 6.20.23.docx](#)

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Greetings,

I am submitting some public comments to the Planning Commission regarding the Agriculture Zoning Changes that are being contemplated by the Planning Commission.

I have attended two meetings of the commission and they have energized me to submit these comments.

Please find attached my thoughts about comments that were made during the meetings and some general comments about farming in Thurston County. We need to slow the loss of farmland in Thurston County. Thurston County is losing it's farmland faster than most Western WA counties. This does not sit well for the future of farming in Thurston County.

Respectfully,

M Cleaver  
Resident of Thurston County

## PLANNING COMMISSION MEETING MY 17<sup>TH</sup>

### Feedback to statements made....

1. Need ability to opt in or appeal to opt out in the new zoning with clear guidelines to do so.
2. If only large parcels put in to LTA it will push ag out farther and farther from families limiting fresh food access. The City of Olympia is looking to provide more farm fresh food access to city dwellers within the city. It is a national goal to have fresh food within walking distance to homes. I encourage you to look at what Davis California has done.
3. Farming can happen without water rights. Current water use allows up to 5000 gallons per day. A lot of drip irrigation can and does happen with this amount of water in Washington.

Not all farm land needs to be irrigated to produce crops.

For example, grain crops don't need irrigation. Hay can be grown, up to two cuttings without irrigation. First cutting in May, usually have ~2 week warm window, second cutting in July. This leads to higher quality hay because it has not over mature (as seen with just one cutting in late June or July) and therefore loses its protein value. It can go from 12% protein to about 5% protein with just one July cutting. Once the grass goes to seed the protein declines significantly. Selling quality hay brings a good income. If a farmer has barn hay storage, it can be sold in the winter. Quality hay stored in the barn is like money in the bank. Farmers can sell it in the winter to help even out cash flow. Demand is usually high then and prices can be more than in the summer. .

Rainwater collection is becoming more popular with farmers in dryer areas. For example, in Marin County in CA, (north of San Francisco) a

dairy farmer is collecting water even when it is not raining. The fog is settling on metal roofs, turning to water and rolling down to gutters and into storage tanks. Bone Dry Ridge in South Thurston County collects rain not only for the animals and garden but also for the house. Ranchers and farmers are tenacious.

Given climate change, Thurston County is experiencing dryer summers. Collection of rainwater in the winter can assist in providing water for pastures and crops in the summer. There is no limit in Washington to the amount of rain water collected. The rule of thumb is that one inch of rain falling on 1,000 square foot roof yields 600 gallons. Don't discount land as not farmable or ranch capable because it does not have water rights. This is a short sided and hampers future farmer access to land.

Know that rocky land is important for wintering livestock. It drains well and can serve as a sacrifice area to save valuable pastures. Livestock in good pastures in the winter will trash the land and lead to a muddy mess with little viable grass for summer graze. A rancher needs both good soils and rocky land to be a good steward of the land. Don't let development occur on rocky, good draining land that is part of ranch enterprise. It is short sighted and will affect the profitable of the ranch in the future. The good pasture land needs to rest in the winter.

Don't be fooled into thinking that rocky land has no value in farming and ranching. Getting the livestock off the pasture and onto rocky ground in the winter saves the pasture, keeps the animals out of mud, keeps the animals healthier and keeps the good pasture land a chance to recover, regrow and provide low cost forage for the livestock come summer. Also know that many farms are now diversified and have livestock. The livestock provide important inputs that improve the soil

health and keep the cost of inputs down, especially for organic farmers. So organic farmers need rocky land too.

#### **4. Ag is not dead in Thurston County**

A statement was made in the planning meeting that there are just a few people making a living from agriculture in Thurston County. There are a number of people who grow food for a living in Thurston County. In fact, organic farmers have been growing in number.

Know that in general, across WA and the nation, one spouse works off the farm or ranch not only to even out monthly cash flow but for benefits such as affordable health insurance for the family. The cost of health insurance is significant and so it is common to have a spouse working off farm. Look at the USDA Census Report to see how common this is.

Please look at the 2023 Community Farm Land Trust's Farm Guide to learn more about many farmers in Thurston. While not inclusive of all farmers, it does list a numbers. Many of the farmers grow food products for our community, many are diversified and organic,

The South Sound Agricultural Producers Needs Assessment done by Thurston & Lewis County Extension and published in 2017 found 69 farmers/ranchers who had sales over \$100K.

#### **5. Evidence of the viability of Ag in Thurston County is:**

- The growth of farms & feed stores in the Thurston County area.
  - a. Tractor Supply opened on Sleater Kinney and Martin Way late in 2015 and opened an additional store in 2016 in Yelm.

b. Coastal Farm & Feed opened a new location on Martin Way in 2022. In addition to farm and feed supplies they sell a number of farm implements

These stores only come to town after doing a lot of homework to find out if the market is big enough to support them. Their presence is evidence of the agriculture presence/needs in the area.

- Kipperts retail store on Highway 99 has been a significant retailer of agriculture tractors. They have been in the top 5 *nationwide* for a number of years. For example, they were number 2 in the nation in 2017 and number 3 in the nation in 2018 for sales of Massey Ferguson Tractors. They sold more tractors than most of the dealers in farm states. They also are in the top ten nationally for three trailer brands they sell. Agriculture is here, but some people don't know it.

6. Newer and young farmers list farm access and ownership as one, if not the top obstacle to farming. It is not the tools to farm as was suggested by one speaker in the meeting, such expenses are more manageable. For example, a 2022 survey from the National Young Farmers Coalition found that 65% of farmers under the age of 40 on the west coast identified affordable land to buy as their primary barrier. Again we need to have the land preserved for farmers today and in the future.

We are running out of farmers. In WA, for every five farmers aged 65 and older, there is only one farmer under 35 years of age. (US Ag Census) This is a critical time. A lot of farmland is owned by an aging population. This is a critical time to keep farmland with farmers and not developed by urban sprawl, warehouses and subdivisions. Think of the future farmers and where they are going to produce food for our community. The purchase of development can make the land

affordable for younger farmers. Then the farmers can have their retirement funds and the land stays farmed for the benefit of the county.

Retiring farm and ranch land owners often have a significant part of their net worth tied up in the land. The purchase of development rights is the logical thing to do. There are other models in the US that have done such purchases and these need to be studied for best practices.

A survey conducted by WSU Extension Thurston & Lewis County of producers (South Puget Sound Agricultural Producers Needs Assessment) was published in May of 2017. It found existing producers ranked land and water issues in the top five . Page 35 in the report highlights some of the challenges of land acquisition.

Know that every 1-2 weeks or so the Community Farmland Trust receives a phone call from someone looking for farmland, especially affordable farmland to lease or purchase. Most often these are experienced younger farmers.

**In summary,**

Know that low density residential areas are highly inefficient and are projected to drive 2/3 of farmland conversion. That smaller farms will be disproportionately impacted in this conversion. This is the most common size of farm in Thurston County. (Farms Under Threat 2040, Choosing an Abundant Future, American Farmland Trust. I encourage you to get a copy of this publication. It has recommended policies that can help to inform and guide the Planning Commission to make educated decisions. You can call them at 800.370.4879 and request a copy or learn where to view this recent publication on line)

I hope you find this information compelling and thought provoking. The job of the planning commission is to plan for the future. Planning should include the preservation of open space and farming, not the continued loss of the land that sustains us. Thurston County is losing farmland at a faster rate than other local counties. You have the power to do something about this. The future of farming in Thurston County is at stake.

**From:** [Robert Vanderpool](#)  
**To:** [Maya Teeple](#)  
**Subject:** Protect Thurston County Farms  
**Date:** Wednesday, June 21, 2023 4:22:41 AM

---

County Staff and Planning Commissioners,

Thurston County has lost too much of our valuable farmland. Between 2012 and 2017, Thurston County has lost 14,388 acres of land in farms. During that same period net farm income increased by 81 percent to \$28,195,000. Conserving our working farms helps produce high quality local food, protects the environment, and is good for the economy.

I urge you to:

- Recommend approval of the new policies and regulations for the designation and conservation of working farms in Thurston County including considering all prime farmland soils for designation as Long-Term Agriculture (LTA) if they meet the other criteria.
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- Include parcels smaller than 20 acres in the Long-Term Agriculture (LTA) designation when they meet the County's criteria and are adjacent to other LTA designations. This would allow fields that consist of a 30-acre lot and a nine acre lot to be designated and protected.
- Adopt better regulations to protect farmland from McMansions and incompatible uses.

Thank you for considering my comments.

Sincerely,  
Robert Vanderpool  
1818 Evergreen Park Dr SW  
Olympia, WA 98502

**From:** [Jami Heinricher](#)  
**To:** [Maya Teeple](#)  
**Subject:** Protect Thurston County Farms  
**Date:** Wednesday, June 21, 2023 10:08:36 AM

---

County Staff and Planning Commissioners,

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- Adopt better regulations to protect farmland from McMansions and incompatible uses.

When farmland turns to development we never get it back. We need farms and we will need them much more in the future.

Sincerely,  
Jami Heinricher  
1014 6th Ave SW  
Olympia, WA 98502

**From:** [Holly Gadbaw](#)  
**To:** [Maya Teeple](#)  
**Cc:** [Tye Menser](#); [carolina.meija@co.thurston.wa.us](mailto:carolina.meija@co.thurston.wa.us); [garyedwards@co.thurston.wa.us](mailto:garyedwards@co.thurston.wa.us)  
**Subject:** Amendments to the Comprehensive Plan and Development Regulations Related to the Designation and Conservation of Agricultural Lands  
**Date:** Wednesday, June 21, 2023 10:19:23 AM

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Dear Chair Casino and Members of the Thurston County Planning Commission:  
As as a Thurston County citizen, former land use planner for the Washington Department of Community, Trade and Economic Development (now Commerce), former Growth Management Hearings Board Member, and former longtime Futurewise Board Member, I have watched for over a decade the loss of agricultural lands in Thurston County due to its inadequate measures to designate and conserve its agricultural lands. I am pleased to see the County is attempting to remedy this situation in its latest comprehensive plan and development regulation update.

I support the recommended improvement for the designation and conservation of working farms in Thurston County including considering all prime farmland soils for designation as Long-Term Agriculture (LTA) if they meet the other criteria. I also support the following alternatives included in the staff report:

- considering farmland of statewide importance soils for designation as Long-Term Agriculture (LTA) if they meet the other criteria, and
- including smaller parcels in the Long-Term Agriculture (LTA) designation when they meet the County's criteria and are adjacent to other LTA designations. This would allow fields that consist of a 30-acre lot and a nine acre lot to be designated and conserved.

I encourage you to adopt better regulations to protect farmland from McMansions and incompatible uses.

Thank you for your service on the Planning Commission. I know how difficult and time consuming it can be. It is nevertheless important work.

Please enter my email in the record of this issue.

Best regards,  
Holly Gadbaw  
1625 Sylvester Street SW  
Olympia, WA 98501  
(360) 754-9401  
hollygadbow@comcast.net

Cc: Maya Temple  
Commissioner Menser  
Commissioner Mejia-Barahona  
Commissioner Edwards

**From:** [Joseph LaValle](#)  
**To:** [Maya Teeple](#)  
**Subject:** Protect Thurston County Farms  
**Date:** Wednesday, June 21, 2023 10:38:37 AM

---

County Staff and Planning Commissioners,

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Thank you for considering my comments.

Sincerely,  
Joseph LaValle  
3180 Vista Verde Lane SW  
Tumwater, WA 98512

**From:** [Callie Wilson](#)  
**To:** [Maya Teeple](#)  
**Subject:** Protect Thurston County Farms  
**Date:** Wednesday, June 21, 2023 11:16:39 AM

---

County Staff and Planning Commissioners,

Include simple dwellings where farmworkers can live.

Thurston County has lost too much of our valuable farmland. Between 2012 and 2017, Thurston County has lost 14,388 acres of land in farms. During that same period net farm income increased by 81 percent to \$28,195,000. Conserving our working farms helps produce high quality local food, protects the environment, and is good for the economy.

I urge you to:

- Recommend approval of the new policies and regulations for the designation and conservation of working farms in Thurston County including considering all prime farmland soils for designation as Long-Term Agriculture (LTA) if they meet the other criteria.
- Recommend designating farmland of statewide importance soils for as Long-Term Agriculture (LTA) if they meet the other criteria.
- Include parcels smaller than 20 acres in the Long-Term Agriculture (LTA) designation when they meet the County's criteria and are adjacent to other LTA designations. This would allow fields that consist of a 30-acre lot and a nine acre lot to be designated and protected.
- Adopt better regulations to protect farmland from McMansions and incompatible uses.

Thank you for considering my comments.

Sincerely,  
Callie Wilson  
3043 Central St SE  
Olympia, WA 98501

**From:** [Susan Davenport](#)  
**To:** [Maya Teeple](#)  
**Subject:** Protect Thurston County Farms  
**Date:** Wednesday, June 21, 2023 12:32:42 PM

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County Staff and Planning Commissioners,

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Thank you for considering my comments.

Sincerely,  
Susan Davenport  
115 Sherman St NW  
Olympia, WA 98502



June 21, 2023

Thurston County Community Planning and Economic Development

Attn: Maya Teeple, Associate Planner

Re: Comments on the Agriculture Zoning Update

Dear Maya and the Thurston County Planning Commission,

Thank you for the opportunity to provide comment on the Long Term Agriculture Zoning for Thurston County. Our mission at American Farmland Trust is to save the land that sustains us by protecting farmland, promoting sound farming practices, and keeping farmers on the land. I participated in the stakeholder workgroup that was engaged early in this process, and commend the county staff for convening people with a broad range of perspectives and navigating difficult conversations to make progress on this long-standing issue.

Farming has a strong future in Thurston County - if we protect it. According to the USDA Census of Agriculture, the market value of agricultural products produced in Thurston County was \$176 million in 2017, a 44% increase from the 2012 census.<sup>1</sup> In spite of this growth in the agricultural sector, farmland has continued to be lost. In the same timeframe, the land in farms fell from 76,638 acres to 62,250 acres, a 19% decrease. Stronger farmland protection is necessary to support the regional farm economy and the local food system.

Zoning is a tool to protect farmland, but when inappropriately applied, it can also be a threat. Much of Thurston County's farmland is currently zoned to allow one dwelling unit per 5 acres. Competing interests for land use have been exacerbated by population growth, driving up the cost of land for farmers trying to start or expand their farm business. With farmers unable to afford the land, the current zoning allows our remaining farmland to be carved up and converted to housing development and other non-farm uses.

To be clear, residential zoning is one of many threats to farmland. Other pressures that impact the viability of agriculture, such as market access, water availability, workforce shortages, and supply chain challenges, are very real for the agricultural community and contribute to conversion of farmland. However, these are challenges we can solve. Once farmland is lost to development, there is no return. The long term impacts of farmland loss to the regional agricultural economy and our local food system will be felt for generations to come.

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<sup>1</sup> United States Department of Agriculture, Census of Agriculture, 2017 Thurston County profile:  
[https://www.nass.usda.gov/Publications/AgCensus/2017/Online\\_Resources/County\\_Profiles/Washington/cp53067.pdf](https://www.nass.usda.gov/Publications/AgCensus/2017/Online_Resources/County_Profiles/Washington/cp53067.pdf)

Through the stakeholder engagement process, I stressed the importance of protecting contiguous farmland to provide greater protection from surrounding land uses. The maps presented in your packet do not provide that contiguity because they do not include smaller parcels of prime farmland adjacent to the larger sizes. This is allowed in the criteria for commercially significant agricultural lands, as identified in WAC 365–190–050 of the Growth Management Act, and should be leveraged to support distinct agricultural districts within Thurston County. This will help concentrate the agricultural services and infrastructure needed to support farm viability in the region. It will also support farmers who need multiple contiguous parcels to operate their farms.

An argument has been made that, if we include smaller parcel sizes, all land in the Long Term Agriculture zone should be able to upzone to the smallest parcel size included in the zoning designation. This approach would cause considerable harm to agriculture in the region, allowing current large parcels of farmland to be subdivided and developed. Many counties include smaller parcel sizes in their agricultural zoning while maintaining a higher baseline for minimum density for development. This is representative of and supports the roles of small, mid-sized, and large farms in the region.

I also advocated that parcels with at least 50% of prime soil be included, as current zoning requires. Agricultural zones do need places where farm infrastructure can be developed on poorer soils, such as barns, storage facilities, and farmworker housing. The scenarios outlined in the staff report suggest a change to parcels with 75% of prime soil be included in agricultural zoning, which puts more pressure on that prime soil to provide the space to develop farm infrastructure. It also puts more parcels containing prime farmland at risk of development to nonfarm uses if they are not included in agricultural zoning.

In the middle of this process to address Long Term Agriculture in Thurston County, a rulemaking update for the WAC that guides the Growth Management Act was completed by the Department of Commerce in March 2023. WAC 365-190-050 now identifies farmland of statewide importance, in addition to prime and unique farmland, to be considered as potentially having long-term commercial significance. Thurston County should also evaluate farmland of statewide importance for inclusion in the agriculture zoning for this update.

Beyond the zoning for Long Term Agriculture, more work is needed in Thurston County to preserve farmland and support farm viability. It is exciting that the county has received a grant to retool their strategies for farmland protection through the Habitat Strategic Initiative Lead. We look forward to continuing to collaborate to strengthen farmland protection in Thurston County.

Thank you for your time in reviewing these comments! Reach out if you have any questions.

Sincerely,  
Dani Madrone  
Pacific Northwest Policy Manager, American Farmland Trust  
[dmadrone@farmland.org](mailto:dmadrone@farmland.org)  
(360) 939-1668

Bonnie Blessing  
Thurston County Resident

To: Thurston County Planning Commission

Re: Wildlife use of parcels proposed to be designated as Long Term Agriculture.

The proposed changes may threaten the habitat of species addressed under Thurston County Habitat Conservation Plan. In particular these changes may result in the loss of Oregon spotted frog habitat or unsuccessful implementation of the Thurston County HCP. The proposed changes occur on or near designated critical habitat or breeding sites of Oregon spotted frogs.

In several locations, critical areas are more protected on rural residential zones than on long term agriculture zones. The CAOs differ. The extensive regulations that protect wetlands from draining (Chapter 24.30.085 and Table 24.30-4) do not apply to agricultural activities (new and existing (Chapter 24.01.025- Applicability of critical area regulations). One consequence of this is that Spotted frogs could be particularly impacted. This organism occupies mostly prime farmland soils in overgrown ag ditches installed before 2012 or 1985. Most of these if not all of the ditches themselves are rarely 'maintained' and maintaining would tend to drain breeding habitat. maintaining did alter habitat in one recent case. So if rural residential parcels with ag activities before 2012 were zoned agriculture, activities on those parcels would fall under the ag CAO (Ordinance 16260 of 2023). In the ag CAO, 'agricultural activities established before 2012 or 1985 are 'not subject to the critical area requirements of this chapter 17.15.400A.

In adjoining counties, ag use meant also maintaining prime soils useful for farming and draining or maintenance of ditches is needed. Ditch maintenance could harm frogs if they were there because it drains their breeding wetlands or directly impacts the frog itself by removing barriers to flow like a beaver dam or grass plug. This specifically occurred in the headwaters of Salmon Creek in a ditch with a wetland occupied by Oregon Spotted Frog. The parcel was in rural residential at the time. This was under the old CAO (Title 17.15.930C entitled Floodplains, streams and wetlands-performance standards for allowed uses and activities) which said that drainage ditch maintenance may be maintained in consultation with state, federal and other. BMPS were followed but it resulted in loss of habitat and the landowner may need to get an independent HCP. The new CAO says ' activities established before 2012 or 1985 are not subject to the critical area requirements of the chapter. Old ditches with spotted frogs were established before 2012. It feel prudent to ensure their sites are not drained.

The proposed changes occur in or immediately adjoining much of the Designated Critical Habitat or Breeding sites of the Oregon spotted frog in the Salmon Creek Basin.

Before proposing to put these rural residential parcels into long term agriculture, I ask the planning commission to ask the staff to review CAOs for Long Term Ag and the consequences for Oregon spotted frog.

2) The county needs to secure some 618 acres of mitigation lands for spotted frogs (page 83, 93, 94 of HCP). These mitigation sites should be 'occupied by the frog, or breeding sites', not working lands, not in an existing preserve and have a willing seller (HCP pages 83, 93, 94 etc). There's actually very very few of these parcels that meet these criteria at this time. If we designate these particular breeding sites as long term agriculture then they cannot be put into a mitigation site without yet another process. Can we just speed this HCP up and go buy these lands or offer funding to buy easements? Can the county let us know if the parcels with key Oregon spotted frog breeding sites and designated critical habitat already have an management agreement with the Partners in Fish and Wildlife program?

To learn more, can we make a map of those known Oregon spotted frog breeding sites (OSF) or designated critical habitat (DCH) and consider whether parcels with OSF and DCH should be zoned LTA.

Regards

Bonnie

**From:** [Bonnie Blessing](#)  
**To:** [Maya Teeple](#)  
**Cc:** [Charlotte Persons](#)  
**Subject:** comment on LTA  
**Date:** Wednesday, June 21, 2023 2:24:21 PM

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Under all three versions of the Long Term Agriculture (LTA) rezone proposal, it appears some breeding Oregon Spotted Frog (OSF) parcels and designated critical habitat and mitigation banks are being proposed for LTA designation. Under WAC 195-190-050 the county can classify agricultural lands of local importance that may need additional protection associated with critical areas. Best available science from the state says to avoid draining Oregon Spotted Frog (OSF) wetlands. However, agricultural lands can get drainage permits.

Because of the Thurston County's obligation to carry out its obligations under federal law (RCE 36.70A.702), the county should take another look at how much mitigation land is available for OSF under the Thurston County Habitat Conservation Plan (HCP).

The HCP and ITP say to prioritize breeding sites that are not working lands. Because the OSF breeding sites that are not working lands are prioritized for mitigation in the HCP and because the acreage of parcel with breeding OSF that are not 'working lands' is relatively limited, the county should prioritize buying the small number of currently known breeding sites that are not 'working lands' for mitigation lands under the HCP. These wetland parcels with prime soils and OSF *do not appear to be otherwise protected under the Critical Areas Ordinance (CAO) or Shoreline Management Program (SMP)*.

However, we do not have an answer to this important question: Do we have the 618 acres of OSF breeding sites that are not working lands for HCP mitigation if we allow draining of the known oviposition sites within newly designated LTA? Please ask your staff to review this.

Bonnie Blessing

6123 Northhill Drive SW

Olympia WA 98512

360-943-6629

**From:** [Betsie De Wreede](#)  
**To:** [Maya Teeple](#)  
**Subject:** Update to Long Term AG designation  
**Date:** Wednesday, June 21, 2023 2:46:12 PM

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To: Maya Teeple, Senior Planner, Thurston County  
 From: Betsie DeWreede, farmland owner, Independence Valley, Rochester  
 Re: Changes to criteria for Long-Term Agriculture (LTA) designation

As a farmland owner in SW Thurston County, I am happy to hear that the Thurston County Planning Commission is considering steps to update the designation of lands best suited for agriculture. This is a positive step. Please enter my comments regarding potential changes to the Thurston County Comprehensive Plan and related Development Code language that improve Long-Term Agriculture (LTA) designation and conservation of prime farmland in Thurston County.

As recommended by staff, I support adding soil types to the soils criterion for LTA designation and making other updates to the Comprehensive Plan and Development Code. These changes would increase the LTA designation by between 12,000 and 23,000 acres. The action would assure the highest consideration be given to preservation of more productive soils for current or future food production.

Further steps to consider should include:

- Identify funding sources to compensate landowners for the lost land value, because of the change to LTA designation (lost development rights).
- Include in the Comprehensive Plan Update **a new policy** that would **permit landowners with parcels outside the LTA zones, but with prime soils or soils of statewide significance to voluntarily permanently change their zoning to preclude subdividing the parcel.**
- Include in the Comprehensive Plan Update consideration of these changes to LTA designation that have not yet been considered by a Stakeholder group or other community outreach:
  - A new policy statement that makes explicate the implication of the Development Code language that reduces the landowner ability to subdivide to not less than 20 (or 15) acres per house for LTA.
  - Examine a path to allow inclusion of lands within the McAllister Springs aquifer recharge area as LTA designation. Address concerns about aquifer contamination by placing limitations on herbicide/pesticide application. This area south of the Yelm highway is outside the UGA, currently predominately in agricultural use (turf and berry farming) on land with water rights and soils recognized as among the best in the county (American Farmland Trust).
  - Include smaller parcels in the Long-Term Agriculture (LTA) designation when they are adjacent to other LTA designations and have prime ag soils. This would include, for example, a nine-acre parcel between two 20 or 40 acre parcels to be designated and protected.
  - Consider farmland of statewide importance soils for designation as Long-Term Agriculture (LTA) if they meet the other criteria.

Thank you for your time and consideration.

Betsie DeWreede  
[Betsie54@gmail.com](mailto:Betsie54@gmail.com)

13136 201 Ave SW  
Rochester, WA  
360-273-5882

## **Bets**

*"The only way you'll end up in a corner is by walking in too straight of a line." Claudia Schmidt from her song, Happy Hearts*

**From:** [C. Persons](#)  
**To:** [Maya Teeple](#)  
**Cc:** [Sam Merrill](#); [Elizabeth Rodrick](#); [Sue Danver](#); [Susan Markey](#); [Anne Van Sweringen](#)  
**Subject:** Comment on Long Term Agriculture Proposals for Planning Commission -- Black Hills Audubon Society  
**Date:** Wednesday, June 21, 2023 2:52:25 PM  
**Attachments:** [LTA Bonnie Blessing comment 6 21 23.docx](#)

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Dear Maya Teeple:

I am sending you this comment for the Planning Commission on behalf of the Conservation Committee of Black Hills Audubon Society:

Black Hills Audubon Society is a chapter of National Audubon Society. Our region includes Lewis, Thurston, and Mason Counties, and we have about 1300 members.

Black Hills Audubon Society is concerned about the impact that the current proposals to expand Long Term Agriculture zoning could have on Oregon Spotted Frog (OSF) critical areas in Thurston County and on the availability of OSF mitigation lands for the Thurston County Habitat Conservation Plan (HCP). We support the attached emailed comments sent today, June 21, 2023 by Bonnie Blessing (attached).

Charlotte Persons

Conservation Committee Member and Director-at-Large, Black Hills Audubon Society

Personal Address:

903 Glass Avenue NE

Olympia, WA 98506

360-431-1174

comment on LTA

Yahoo/Inbox

**Bonnie Blessing** <bonnie.blessing@gmail.com>

To: Maya Teeple

Cc: Charlotte Persons

• Wed, Jun 21 at 11:24 AM

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