



TO: Island County Planning Department
FROM: Agriculture Resources Committee/Island County
DATE: July 21, 2025
RE: ARCIC Comments on Draft Comprehensive Plan Goals & Policies

Introduction

Thank you for the continued opportunity to participate in Island County's Comprehensive Plan Update. The Washington State Growth Management Act (GMA) emphasizes maintaining and enhancing natural resource-based industries, including agriculture (RCW 36.370A.020). As an organization dedicated to advocating for, educating, and connecting Island County's farmers, ranchers, food processors, and other agricultural stakeholders, ARCIC views its role in this process as a representative voice for the local agricultural community. We aim to support the County in developing a Comprehensive Plan that aligns with the goals and priorities of the GMA and is beneficial to local farmers.

With support from the Washington Department of Commerce, ARCIC's participation in this process had three key positive outcomes:

1. Our county's diverse farming community joined together and held meaningful dialog about current local agriculture issues in December of 2024.
2. ARCIC has been able to better examine and refine these issues through internal reviews and communication with other community-based organizations.
3. County staff and appointed and elected officials learned about the state of local agriculture, including current agricultural data and trends and the issues that matter to local farmers.

ARCIC members have reviewed the current drafts of the Update that relate to agriculture. With the inclusion of most of our recommendations, we appreciate the attention given to our input. We also found the editing of existing goals and policies helpful, resulting in more concise and organized language. The following is ARCIC's general feedback on the draft elements that were recently released for public comment. See Attachment 1 for our specific edits and comments on relevant goals and policies.

Vision and Values

The County's draft vision and values statement skillfully and thoughtfully articulates the complex issues we face. ARCIC appreciates the recognition and inclusion that agriculture is given as part of the County's vision for the next 20 years.

The statement, "Our aim with this comprehensive plan update is to keep rural lands rural ..., " caught our attention and we hope that this sentiment relates to a shared value of maintaining and enhancing local agriculture uses in rural areas. We caution that "rural" means different things to different people and worry that use of this term prioritizes rural living (low density residential use) over working farmland. ARCIC suggests, as future components of the Update are drafted, this term and its associated values are carefully defined.

Compared to other counties in Washington State, Island County's agriculture sector is mostly comprised of small farms and, in its modern history, always has been.¹ Over the last hundred years, agricultural enterprises have collectively contributed to the County's quality of life and economy. Their continued success and viability will take a commitment by farmers and local government that involves regional coordination, development of private-public partnerships, and regular examination of local regulations and programs.

We also see an opportunity for further discussion of local agricultural issues in the Update's elements that addresses:

- Local agriculture's role in achieving the County's vision.
- Where farmland preservation falls amongst the County's priorities.
- Ways in which local government and other agencies can maintain and enhance agricultural viability, with an awareness of the County's diversity – size, enterprises, needs – of local farms

In particular, the Land Use element is an appropriate element in the plan in which to give a sense of the past, present, and future of local agriculture; local agriculture's contributions to the broader community; and the evolving needs of farmers that require urgent and consistent attention from county government. Farmers discussed these topics at our Farmer Town Hall meeting last December; we have drafted a general description that reflects how our local farming community views agriculture in Island County (see Attachment 2).

Goals and Policies

ARCIC is in favor of and supports the goals and policies presented in the drafts with specific, detailed edits and feedback provided in Attachment 1. Below are broader responses to the drafts, covering issues we request be given reconsideration.

¹ Small farms can be categorized by acreage or income. The USDA defines a small farm as farms with a Gross Cash Farm Income (GCFI) of less than \$250,000. In 2022, the vast majority of farms fall under the USDA's small farm definition. However 17 (4.5%) of Island County farms earned more than \$250,000 in gross sales.

1. Economic Development Strategies for Agriculture

Economic viability is the top concern of farmers, and for many farms, the greatest threat to their operations and enterprises. ARCIC will continue to advocate for the implementation of strategies that are consistent with the proposed Economic Development policies.

One of ARCIC's highest priorities is to pursue implementation of the Comprehensive Economic Development Strategy's recommendations that support the agricultural economy. In collaboration with other groups, including the Economic Development Council, economic impact studies and strategic economic development plans can result in informed decisions regarding investments in food processing facilities, distribution centers, business support services, farmland protection, and regional collaboration.

2. Connecting Farmers to County Administration

Having a County Agricultural Advisory Board was the second highest ranked recommendation at ARCIC's farmer town hall meeting. Agriculture-related policies found throughout the Update warrant the need for direct communication between the farming community and county staff and officials. Such communication will further the values and supporting goals and policies expressed in the Update in a way that will help rather than hinder farming. If neither an Advisory Board or ombudsperson (another recommendation ARCIC has made) are feasible at this time, we must find a solution to create an effective avenue for communicating and resolving farming issues that intersect with County regulations.

3. Housing

Most Island County farmers are not looking to build housing on their farms. Increasing the availability long-term, affordable rentals will fulfill their employees' housing needs. ARCIC asks the County to actively seek creative housing solutions as this need is urgently impacting local farm businesses' viability.

4. Water Availability

We commend the continued commitment to conserve water. We request adding a policy that addresses the importance of water to agriculture (irrigation and livestock) and acknowledge the dependence agricultural operations have on access to water.

5. Farmland Preservation

Our previous recommendations included a request for the creation of a strategic plan for farmland preservation. Since our last communication, we recognize that organizations like Whidbey Camano Land Trust are effectively filling this role, often leveraging County Conservation Futures Funds with other funding sources to protect farmland. While we appreciate the various approaches included in the comprehensive plan to preserve farmland,

ARCIC would like to see a policy that supports the continued use of Conservation Futures Funds for farmland preservation.

6. Best Management Practices

We would like more information and context regarding Policy 3.5 in the Natural Resources element, which states, “Require implementation of Natural Resources Conservation Service best management practices for new and existing agricultural activities.” We wonder how, as a requirement, this will be monitored and enforced as well as County staffing and budget impacts. We are also concerned that this policy could jeopardize farms that are not in violation of the Critical Areas Ordinance or any other local, state, or federal regulations, but experience the implementation of NRCS best management practices to be cost prohibitive.

Rather than creating a policy that has punitive implications and might not always be practical, we suggest a policy that is supportive, builds upon existing resources, and enables farmers to adopt and incorporate best management practices that are in their and the County’s best interest. We have included our recommended wording for this policy in our comments in Attachment 1.

Moving Forward

ARCIC looks forward to continued participation in the comprehensive plan update process and we are happy to provide additional clarification on the needs of our agricultural community. This process has helped us better understand the pressures local food growers and producers face. We hope our input has done the same for County staff and officials and informs policy creation and implementation that benefits our local farms and, in turn, the broader community.

Attachments:

Attachment 1: Specific edits and feedback on relevant goals and policies

Attachment 2: Description of local agriculture

Attachment 1. ARCIC's Feedback on Selected Comprehensive Plan Update Goals and Policies

Element	Goal or Policy		Proposed Policy Revision	ARCIC Comments
Land Use	6.39.5	Minor or small scale agriculture activities are consistent with rural areas, support rural character, and should be protected and encouraged.	<u>Encourage and protect small scale agriculture activities.</u> Minor or small scale agriculture activities are consistent with rural areas, support rural character, and should be protected and encouraged.	Edit: Encourage and protect small scale agriculture activities, including those that occur on land not zoned commercial agriculture. Comment: Additional clarity.
	7.310.3	Right to farm and forest measures shall protect the right to pursue farm and forestry activities.	No change.	Edit: Protect the right to pursue farm and forestry activities by upholding right to farm and forest laws.
	7.410.4	Measures shall be used to support roadside stands or farmers’ markets which may help farmers who wish to directly market products to nearby residential areas.	Measures shall be used to support roadside stands or farmers’ markets, which may help farmers who wish to directly market products to nearby residential area	Edit: Permit roadside farm stands, farmers markets, and other allowable agricultural and value-added sales outlets in locations that serve residential areas in proximity to farms. Comment: Edit to put in active tense, rephrase to be a land-use oriented policy. If marketing is the main purpose of the policy, move to the Economic Development element.
	7.510.5.1	Limit nonagricultural uses to lands with poor soils or areas otherwise not suitable for agricultural purposes.	<u>Nonagricultural uses should be allowed primarily on lands with poor soils or areas otherwise not suitable for agricultural purposes.</u> Limit nonagricultural uses to lands with poor soils or areas otherwise not suitable for agricultural purposes.	Edit (Option 1): Direct nonagricultural uses to land with poor soils or areas otherwise not suitable for agricultural purposes. Edit (Option 2): Discourage nonagricultural uses on land with prime farmland soils or areas that are suitable for agriculture. Comment: ARCIC is unclear about the meaning of this policy. Is the purpose to make sure that land with prime farming soil does not convert to non-ag uses? Does it mean that farming should not be allowed on land with poor soils?
	7.610.6	Cooperative agricultural production and marketing will be encouraged.	<u>Review Island County code for barriers to agri-tourism activities, and consider ways to remove those boundaries.</u> Cooperative agricultural production and marketing will be encouraged.	Edit: Review Island County code for barriers to agricultural activities, including agri-tourism, and consider ways to remove them. Comment: ARCIC suggests the following rewording, as there are building code and other barriers faced by farmers not related to agri-tourism.
	7.710.7	Encourage agricultural landowners to retain their lands in agricultural production and to utilize tax incentive programs.	Encourage agricultural landowners to retain their lands in agricultural production and <u>through, among other means,</u> to utilize tax incentive programs.	Edit: Provide tax incentive programs, among other means, to encourage agricultural landowners to retain their land in agricultural production.
	7.810.8	Support innovative public and private programs that provide farmers incentives to stay on the land.	Support innovative public and private programs that provide farmers incentives to stay on the land, <u>including conservation of lands suitable for agricultural use.</u>	Edit: Support public and private programs that provide incentives for farmers to stay on the land and for landowners to conserve lands suitable for agricultural use.

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Element	Goal or Policy		Proposed Policy Revision	ARCIC Comments
	7.9 12.2	Reserve lands which because of their size, soil type, and active management are part of an essential land base for continued commercial agriculture. Assure that these lands have continued viability to serve as a resource for food, fiber, feed and forage.	<u>Reserve lands which because of their size, soil type, and active management are part of an essential land base for continued commercial agriculture. Support the continued viability of these to serve as a resource for food, fiber, feed and forage</u>	Comment: ARCIC is unclear on the meaning of “reserve”. Is it suggesting the use of zoning (eg. districts, overlays) as a way to reserve or identifying lands that should be preserved for farming?
	7.8	Innovative development concepts will be encouraged to buffer agricultural and mineral resource lands from development.	<u>Innovative development concepts will be encouraged to buffer agricultural and mineral resource lands from development.</u>	Edit: Explore innovative development concepts that buffer resource lands from development.
Economic Development	1.4	Encourage agricultural and forestry land uses that help farmers and foresters stay on the land thus protecting the County's rural character, which in turn, attracts other economic activities.	No change	Edit: Support farmers and foresters to encourage agricultural and forestry land uses to protect the County's rural character and attract other economic activities.
	<u>1.13</u>	<u>New policy</u>	<u>Promote the creation of community gardens and community and commissary kitchens to help achieve food security.</u>	Edit: Promote the creation of community gardens and shared commissary kitchens to help achieve food security. Comment: Move to Climate Element Goal 2: Support Resilient Rural Communities.
	2.1	Encourage and support public/farmers markets and small-scale farming operations.	No change	Edit: Encourage and support farmers markets, farm stands, and small-scale farming operations.
	2.2	Acknowledge as a basis for planning that the goals of preserving rural lands and enhancing economic vitality are complementary and not mutually exclusive, as the County's rural character is a direct economic asset.	No change	Comment: This, very eloquently stated, is exactly why serious attention needs to be paid to the economic viability of agriculture in Island County.
	5.1	Encourage and support efforts to enhance the profitability of agriculture and forestry operations with value added and specialty products and cooperative marketing programs.	No change	Edit: Encourage and support efforts to enhance the profitability of agriculture and forestry operations with value-added processing facilities and cooperative marketing programs.
Natural Resources	4.5.4 <u>3.5</u>	Require implementation of best management practices for new and existing agricultural activities.	Require implementation of <u>Natural Resources Conservation Service</u> best management practices for new and existing agricultural activities.	Edit: <ul style="list-style-type: none"> Coordinate with local, state and federal agencies and organizations to encourage conservation of productive agricultural land through best management practices, including soil and water conservation, drainage, and livestock nutrient and waste management programs. Support the work of Washington State University Cooperative Extension, Whidbey Island Conservation District, and Snohomish Conservation District for technical and marketing assistance for small-scale commercial farmers. Comment: Please provide further clarification regarding this policy. Is this a GMA mandated policy? How will compliance be monitored? We suggest replacing the policy with the two above which were borrowed from Jefferson County's Comprehensive Plan.

Attachment 1. ARCIC’s Feedback on Selected Comprehensive Plan Update Goals and Policies

Element	Goal or Policy		Proposed Policy Revision	ARCIC Comments
	7 <u>6</u>	Manage and protect ground water and provide for resource protection through a common goal of non-degradation for existing and future residents of Island County.	No change	Comment: Please add a policy in this element that addresses the importance of water to agriculture (irrigation and livestock) and acknowledges the dependence agricultural operations have on access to water.
	13.8	New policy	Encourage reforestation of underutilized or degraded lands and agroforestry practices that integrate native trees into the landscape.	Edit: Policy: Encourage native reforestation on lands that are no longer in production. Sub-policy: Support and incentivize agroforestry practices that integrate trees, shrubs, and other perennials into production systems. Comment: We believe the existing version is too narrow by limiting agroforestry practices to native trees only.
Climate	8.1	New policy	Expand local food security and the food-related economy to address climate impacts and increase access to healthy, affordable, and climate-friendly foods.	Comment: “climate-friendly foods” is jargon – does this mean food that has been produced using climate friendly practices or plant-based foods?

ATTACHMENT 2: Description of Island County Agriculture

Provided by the Agriculture Resources Committee for Island County (ARCIC) based on input from the local farming community at the December 5, 2024 Farmer Town Hall Meeting.

Agriculture is an enduring way of life in Island County and a vital part of its economy, landscape, and cultural identity. As of the 2022 USDA Farm Census, the county was home to 377 farms - 98% of which are family-owned - covering 17,038 acres. The market value of agricultural products sold rose from \$12 million in 2017 to \$23.5 million in 2022, underscoring the sector's economic significance.

With a range of soil types, microclimates, and water availability, farms in Island County are diverse in scale and production. These characteristics have allowed Island County's agricultural landscape to adapt and change, especially in response to local and regional economic factors. While the amount of farmland in production dropped steeply between the 1930s and 1970s, local farmers over the last several decades have shown resilience with a strong ethic for preserving and stewarding farmland. As part of adapting to external forces and market trends, established and new farmers embrace innovations and integrate sustainable and regenerative cropping practices into their operations. Today's farming activities in Island County range from small acreage farms that focus on higher-value crops, larger operations that engage in less input intensive cropping, and livestock operations. Farmers sell their products, which include value-added goods and direct-to-consumer sales, at the local and regional level.

In an era of disrupted supply chains and climate-driven agricultural uncertainty, our diversified agricultural landscape adds to Island County's food system resiliency. Like the saying, "the whole is greater than the sum of its parts," from commercial growers to backyard homesteaders, local farmers offer the variety of products, growing methods, and distribution networks that provide critical food security for the County's residents.

The future of agriculture in Island County, however, is challenging. Farms of all sizes face increasing headwinds: rising input, labor, equipment, and insurance costs; limited access to processing facilities, farm equipment rental/repair, and affordable housing; and regulatory burdens not designed for scale or flexibility. Land affordability is often a barrier to entry for new farmers, who, as a result, work on smaller acreage with a focus on intensive production and soil health. At the same time, local farms are woven into the fabric of our county's identity, and contribute immeasurably to the islands' scenic landscapes, rural land use patterns, and tourism economy. Agritourism, which includes farm experiences and lodging, plays a growing role in generating new streams of revenue for farms that help maintain their economic viability.