



SAN JUAN COUNTY DEPARTMENT OF COMMUNITY DEVELOPMENT

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MEMO

MEMO DATE: October 12, 2020

TO: San Juan County Council

CC: Mike Thomas, County Manager
Erika Shook, AICP, DCD Director

FROM: Adam Zack, Planner III 

SUBJECT: San Juan County Comprehensive Plan
Element B.2 Land Use and Rural
Natural Resource Land Review Methodology

BRIEFING DATE: October 13, 2020

ATTACHMENT: A. September 30 draft Natural Resource Land Designation Review Methodology

PURPOSE: To brief the County Council on the proposed methodology for reviewing natural resource land designations during the Comprehensive Plan (*Plan*) update.

BACKGROUND: The County is required by the Growth Management Act (GMA) to review natural resource land designations, policies and development regulations during the mandated periodic review (WAC 365-196-480(1)(b)). Reviewing natural resource land designations must be done on an area-wide basis. The County is not required to reevaluate the entire designation process and should primarily focus on consistency with the *Plan* designation criteria (WAC 365-196-480(2)(e)). The attached draft methodology proposes the steps for evaluating natural resource land designations during the *Plan* update.

Under the GMA, the County must determine where natural resource operations for forestry, agricultural, and mining industries can productively operate. The GMA also requires land use controls to conserve the necessary resource lands and to avoid conflicts between these industries and other land uses.

The idea is to promote the continuation of natural resource production activities on these designated lands by avoiding interference from other incompatible land uses, such as dense residential housing. The requirement to classify, designate and protect natural resource lands recognizes the essential role of these lands in supporting economic productivity and healthy ecological systems. The GMA purpose for designating resource lands is succinctly stated in WAC 365-190-040(6):

“The law requires that natural resource land uses be protected from land uses on adjacent lands that would restrict resource production. [. . .] The purpose of designating natural resource lands is to enable industries to maintain access to lands with long-term commercial significance for agricultural, forest, and mineral resource production. The purpose is not to confine all natural resource production activity only to designated lands nor to require designation as the basis for a permit to engage in natural resource production.”

The GMA agricultural resource land designation criteria are established in WAC 365-190-050. It lists factors that should be considered when designating agricultural lands. These are summarized as:

- The land is not characterized by urban growth;
- The land is used or capable of being used for agricultural production. This is usually based on the soil type, quality, and productivity;
- The intent of the owner is not a controlling factor; and
- The land has long-term commercial significance for agriculture.

The primary considerations for designating Forest Resource Lands is provided in WAC 365-190-060(2) and are summarized below:

- The land is not characterized by urban growth;
- The land is used or is capable of being used for forestry production based on physical and geographic characteristics;
- The intent of the owner is not a controlling factor; and
- The land has long-term commercial significance considering WAC 365-190-060(2)(c) guidance:

When determining whether lands are used or capable of being used for forestry production, counties and cities should determine which land grade constitutes forest land of long-term commercial significance, based on local physical, biological, economic, and land use considerations. Counties and cities should use the private forest land grades of the department of revenue (WAC 458-40-530). This system incorporates consideration of growing capacity, productivity, and soil composition of the land. Forest land of long-term commercial significance will generally have a predominance of the higher private forest land grades. However, the presence of lower private forest land grades within the areas of predominantly higher grades need not preclude designation as forest land.”

The WAC 365-190-070(3) establishes five criteria for classifying mineral resource lands, they are summarized below:

- Consider geologic, environmental, and economic factors in addition to existing land uses and ownership;
- Whether the land has potential long-term commercial significance for the extraction of sand, gravel and valuable metallic substances;
- Use maps and information on location of mineral deposits provided by state and local agencies;
- Consider the geology and distance to market for the resources. A list of factors is provided in WAC 365-190-070 (d):

“(i) Physical and topographic characteristics of the mineral resource site, including the depth and quantity of the resource and depth of the overburden;

(ii) Physical properties of the resource including quality and type;

(iii) Projected life of the resource;

(iv) Resource availability in the region; and

(v) Accessibility and proximity to the point of use or market.”

- Other factors for consideration include ensuring access to resources, the proximity to population areas, and the energy cost of transporting minerals.

PHASED APPROACH: The attached draft methodology utilizes four phases to review natural resource land designations. The proposed phases are:

Phase One – Analyze all parcels to determine how they conform to GMA criteria

- Step One – Determine long-term commercial significance index
- Step Two – Remove parcels characterized by urban growth
- Step Three – Identify parcels used or capable of being used for resource production

Phase Two – Analyze all parcels to determine if they meet *Plan* criteria

- Step One – Divide Phase One parcels that are and are not designated natural resource lands
- Step Two – Review parcels for consistency with *Plan* criteria
- Step Three – Analyze long-term commercial significance index on lands that are and are not designated natural resource lands

Phase Three – Public Input

- Step One – Brief and get input from the Agricultural Resource Committee and San Juan Islands Conservation District
- Step Two – Brief the Planning Commission and County Council

Phase Four – Detailed Analysis

PHASE ONE: Phase One analyzes all parcels for how they conform with the GMA criteria for natural resource land designations. This is not a determinative analysis, meaning that it will not tell us whether or not a parcel is natural resource land but rather it will show the relative long-term commercial agricultural and forestry significance based on the GMA criteria in Chapter 365-190 WAC. Phase One will be conducted countywide using GIS software to automate the analysis. Staff performed a preliminary run on small study areas to provide an example of what the results of Phase One will look like.

Long-Term Commercial Significance Index

To analyze consistency with the GMA criteria, parcels will be assigned a long-term commercial significance index (LCSI). The LCSI is a metric that will help the County evaluate the relationship of each parcel to the GMA long-term commercial significance criteria. The method of calculating the LCSI for agricultural and forest resource lands is different for each type of resource because the GMA long-term commercial significance criteria are specific to each resource.

To calculate the LCSI, each criterion will be assigned a score that indicates a degree to which the parcel is consistent with the GMA criteria. The score is multiplied by a weight assigned for each criterion. The weight modifiers are applied because some designation criteria have a greater influence on the potential for long-term commercial significance. The resulting total is the complete score for that criterion.

Table 1 below shows the agricultural resource land designation from WAC 365-190-050(C), the weight assigned to that criterion, and the scores. For example, if a parcel is more than 75 percent prime farmland, it would score an eight for that criterion (factor score 4 times weight 2). This process is repeated for all criteria for a maximum score of fifty. During Phase One, an LCSI will be calculated for both agricultural and forest resource lands.

Table 1. *WAC 365-190-050(C) Agricultural Land Long-term Commercial Significance.

Criterion 1	
Criterion	The classification of prime and unique farmland soils as mapped by the NRCS (WAC 365-190-050(3)(c)(i))
Weight	x2
Factor Scores	
4	If more than 75% of parcel is prime farmland
3	If between 50 and 75% of parcel is prime farmland
2	If between 25 and 50% of parcel is prime farmland
1	If between 1 and 25% of parcel is prime farmland
0	If no prime farmland soils

Source: September 30 draft Natural Resource Land Designation Review Methodology.

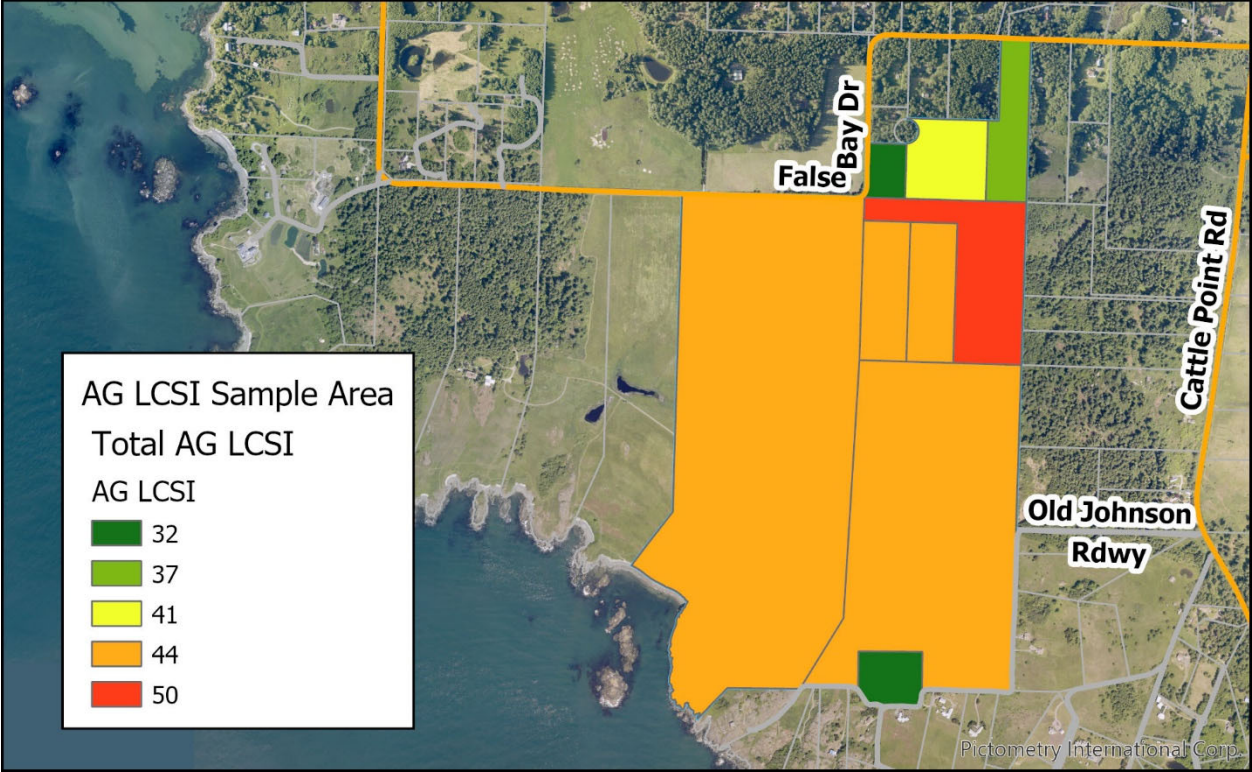
*Washington Administrative Code

Map 1 below shows the Agricultural LCSI in a study area on San Juan Island. Map 2 shows the Forestry LCSI in a study area on Shaw Island. A higher LCSI score indicates that a parcel has greater commercial significance based on the GMA criteria in Chapter 365-190 WAC. The attached draft methodology explains how the scores were calculated. The example maps were created by manually calculating the Agricultural and Forestry LCSI for the study areas. They show a range of scores across several parcels in each study area. The countywide calculations will be automated in a process like the one used for the *Land Capacity Analysis*.

The example maps show the LCSI scores in each study area from green to red, with red being higher scores (more commercially significant) and green being lower scores (less commercially significant). Maps similar to the example but showing the entire County will help to identify areas with higher LCSI scores. The maps and the associated tables will form the defensible basis for making natural resource land designation changes by linking the decision-making process to the GMA criteria. Later in the analysis, staff will find places that do and do not meet the *Plan* designation criteria and compare the results with the LCSI scores, which stem from the GMA requirements. This will help to ensure that designation changes are based on not only *Plan* requirements but also the GMA criteria.

Tables 2 and 3 show the data tables that result from the calculation of the Agricultural and Forestry LCSI. Each column headed by AGCrit or FOCrit shows that parcel's score for each of the GMA long-term commercial significance criteria in WAC 365-190-050 and 060. The final column on the right shows the total LCSI score for each parcel in the study area. Tables such as these will assist in evaluating natural resource land designation changes. It will allow the County to 'show their work' when determining if a parcel does or does not meet the natural resource land designation criteria.

Map 1. Agricultural Long-Term Commercial Significance Index Study Area Preliminary Example.



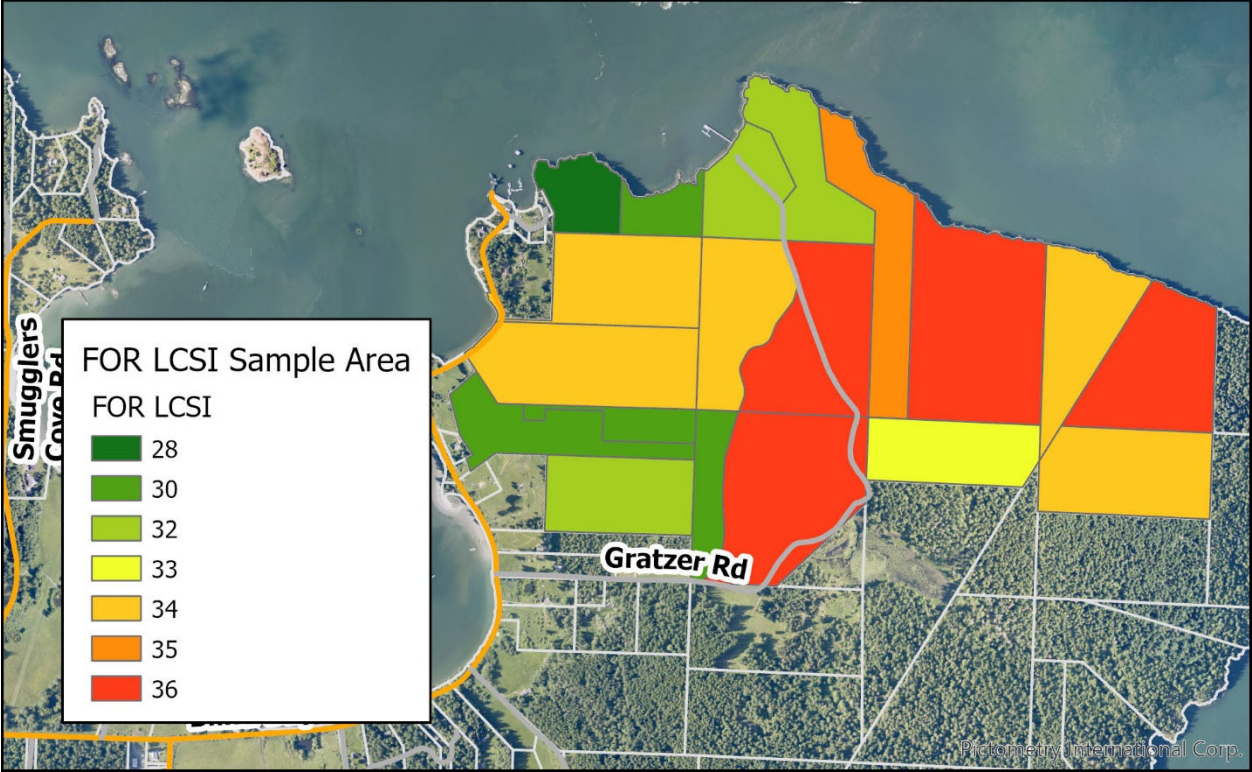
Source: SJC GIS and Natural Resource Land Designation Review Draft Methodology.

Table 2. Agricultural Resource Long-Term Commercial Significance Index Preliminary Example.

PIN	Island	Landuse	Legal_Acre	Use_Code	AGCrit_1	AGCrit_2	AGCrit_3	AGCrit_4	AGCrit_5	AGCrit_6	AGCrit_7	AGCrit_8	AGCrit_9	AGLCSI
340311001000	San Juan	AG	9.99	9100	8	2	6	4	4	4	5	5	6	44
340311002000	San Juan	AG	20.28	9430	8	4	6	4	4	8	5	5	6	50
340311003000	San Juan	AG	9.99	1800	8	2	6	4	4	4	5	5	6	44
340341001000	San Juan	AG	5.10	1100	6	0	0	4	4	4	3	5	6	32
340341002000	San Juan	AG	81.58	8300	8	0	6	4	4	8	3	5	6	44
340342001000	San Juan	AG	135.55	9420	8	4	0	4	4	8	5	5	6	44
353444001000	San Juan	RFF	8.72	1801	8	4	0	4	4	4	2	5	6	37
353444002000	San Juan	RFF	9.55	8300	8	4	6	2	4	4	2	5	6	41
353444005000	San Juan	RFF	3.39	1107	4	4	0	2	4	2	5	5	6	32

Source: Natural Resource Land Designation Review Methodology.

Map 2. Forestry Long-Term Commercial Significance Index Study Area Preliminary Example.



Source: SJC GIS and Natural Resource Land Designation Review Draft Methodology.

Table 3. Forest Resource Long-Term Commercial Significance Index Preliminary Example.

PIN	Island	Landuse	Legal_Acre	Use_Code	FOCrit_1	FOCrit_2	FOCrit_3	FOCrit_4	FOCrit_5	FOCrit_6	FOCrit_7	FOCrit_8	FO_LCSI
262613001000	Shaw	RFF	15.8399	9100	6	6	6	4	0	4	2	6	34
262613002000	Shaw	RFF	20.6891	9100	6	6	8	4	0	4	2	6	36
262622001000	Shaw	FO	13.6027	9420	6	6	4	4	0	4	2	6	32
262622002000	Shaw	FO	10.583	9420	6	6	4	4	0	4	2	6	32
262623001000	Shaw	FO	23.5915	9420	6	6	8	4	0	4	2	6	36
262623002000	Shaw	FO	16.4191	9420	6	6	6	4	0	4	2	6	34
262624001000	Shaw	FO	34.4972	9420	6	6	8	4	0	4	2	6	36
262624002000	Shaw	FO	17.0314	9420	6	6	6	5	0	4	2	6	35
262631003000	Shaw	FO	14.263	9420	6	6	4	5	0	4	2	6	33
262632002000	Shaw	FO	7.1188	9420	6	6	2	4	0	4	2	6	30
262632003000	Shaw	FO	27.8934	9420	6	6	8	4	0	4	2	6	36
262642001000	Shaw	RFF	19.5032	1900	6	6	6	4	0	4	2	6	34
262711001000	Shaw	RFF	5.1892	9420	6	6	2	4	0	4	2	6	30
262711002000	Shaw	RFF	7.2841	1901	6	6	2	2	0	4	2	6	28
262714002000	Shaw	RFF	23.761	1800	6	6	8	2	0	4	2	6	34
262714004000	Shaw	RFF	18.473	9100	6	6	6	4	0	4	2	6	34
262741001000	Shaw	RFF	12.3137	1100	6	6	4	2	0	4	2	6	30
262741008000	Shaw	RFF	5.0067	9100	6	6	2	4	0	4	2	6	30
262741009000	Shaw	RFF	15.093	9100	6	6	6	2	0	4	2	6	32

Source: Natural Resource Land Designation Review Methodology.

PHASE TWO: In Phase Two of the methodology, all parcels are analyzed for whether they meet the *Plan* designation criteria. Phase Two will result in a preliminary list of parcels that may qualify for designation or de-designation as natural resource lands. Phase Two has the following three steps:

- **Step One:** divide Phase One results into lands that are and are not designated natural resource lands on the Official Maps;
- **Step Two:** review parcels for whether they meet the *Plan* criteria; and
- **Step Three:** develop a preliminary list of parcels that might qualify for designation or de-designation as natural resource lands based on GMA and *Plan* criteria.

Phase Two will help the County identify parcels that might need a change in designation. Table 4 shows how parcels will be categorized at the end of Phase Two.

Table 4. Parcel Categorization in Phase Two, Step Three.

Parcels that are:	Higher LCSI Score	Lower LCSI Score
Designated & meet <i>Plan</i> criteria	Don't change designation	Maybe change designation (ambiguous results)
Designated & do not meet <i>Plan</i> criteria	Maybe change designation (ambiguous results)	Change designation (de-designate)
Not designated & meet <i>Plan</i> criteria	Designate as resource lands	Maybe change designation (ambiguous results)
Not designated & do not meet <i>Plan</i> criteria	Maybe change designation (ambiguous results)	Not natural resource lands

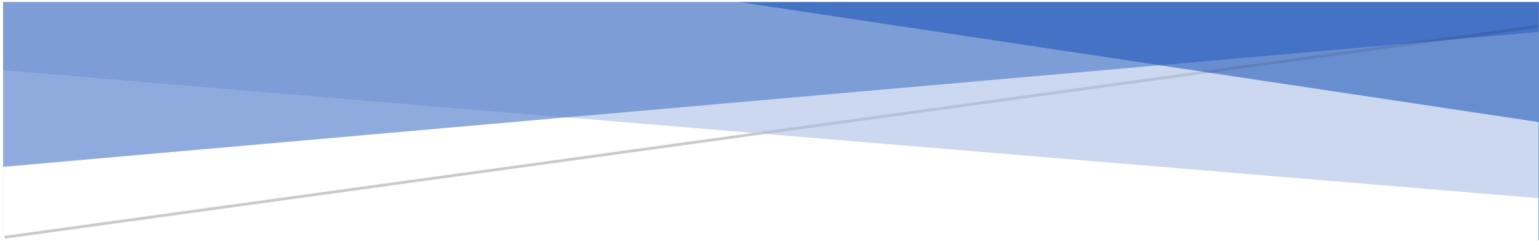
Source: Draft Natural Resource Land Designation Review Methodology.

PHASE THREE: The County Council, Planning Commission and the public will weigh in on the Phase Two results. Specific feedback will be requested about the parcels that have potential for de-designation or designation as a resource land, and those parcels that have ambiguous results. Ambiguous parcels are those that meet either the GMA or *Plan* criteria but not both. An example of ambiguous results are parcels that are designated natural resource lands, meet the *Plan* criteria, but have a low LCSI.

The four types of results marked for further discussion are not clear-cut yes or no for designation. The discussion with stakeholders, Council, and PC will clarify what should be done with these parcels in the grey area. Phase Three will result in a list of possible designation changes that will be analyzed specifically in the next phase.

PHASE FOUR: A preliminary list of candidates for designation changes will be developed in Phase Two and refined with public input in Phase Three. In Phase Four these candidates will be given an in-depth review for consistency with the GMA and *Plan* natural resource land designation criteria. This in-depth review will help staff determine their recommendation for designation changes.

The attached draft methodology provides an example of the tables that will be used for in-depth analysis of re-designation candidate areas. These tables will be completed for all areas proposed for either designation or de-designation as natural resource lands.



Attachment A

NATURAL RESOURCE LAND DESIGNATION REVIEW DRAFT METHODOLOGY

Comprehensive Plan Update 2036

San Juan County Department of Community Development
Adam Zack, Planner III

DRAFT

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Natural Resource Land Designation Review Methodology

The Growth Management Act (GMA) requires review of natural resource land designations for agricultural and forest resource lands during the periodic review of the San Juan County Comprehensive Plan (*Plan*). The County is not required to revisit the entire designation process but rather, evaluate designations for consistency with the GMA and the *Plan* criteria adopted in Element 2, Land Use (Washington Administrative Code (WAC) 365-196-480(2)(e)).

This document identifies the data sources, State and local natural resource designation criteria and the steps for conducting the review of agricultural and forest land designations on the *Plan* Official Maps. It describes deliverables by which the County will “show its work” and addresses the process for making policy decisions, obtaining public input and developing designation alternatives.

The methods used to evaluate the Ag and Forest Resource lands adopted with the original Comprehensive Plan in 1998 are unclear. After twenty-two years, the County has improved GIS tools that can be used to conduct the analysis of the State and local resource land designation criteria. The proposed methodology relies on a phased approach to analyzing the State and local review criteria.

Phased Approach

Natural resource land designations must be consistent with the GMA and the *Plan*. This new methodology and process of reviewing natural resource land designations has four phases:

- Phase One:** Determine conformity or non-conformity to the GMA designation criteria for all tax parcels.
- Phase Two:** Determine conformity or non-conformity to the local designation criteria for all tax parcels. Identify possible designation changes.
- Phase Three:** Obtain public input on potential re-designations.
- Phase Four:** Analyzed potential re-designations and prepare Official Map alternatives.

Data Sources

The review of natural resource land designations will use eight federal, state, and local data sources:

- **SJC *Plan* Official Maps (Official Maps).** The Official Maps of the *Plan* identify existing land use designations. <https://data2017-01-09t190539232z-sjcgis.opendata.arcgis.com/datasets/comprehensive-plan-land-use>
- **San Juan County (SJC) Parcel Data.** This is a GIS data set regularly updated by the SJC Assessor’s office and provides numerous characteristics of each parcel including Assessor’s use codes, acreage and location. <https://data2017-01-09t190539232z-sjcgis.opendata.arcgis.com/datasets/parcels>
- **SJC Assessor’s Tax Map.** The tax map depicts parcels that are enrolled in the Current-Use Farm and Agriculture or Designated Forest Land tax programs.

- **United States Department of Agriculture Natural Resource Conservation Service (NRCS) Soil Maps.** The NRCS soil maps show the location and extent of the soils that are best suited to agricultural production. These maps have been updated and made web-based since the last Land Use Element was adopted. <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>
- **Washington State Department of Natural Resources (WDNR) Private Forest Land Grade (PFLG) Maps.** The PFLG maps shows the location and extent of forest soils. The WDNR, Natural Resources Conservation Service (NRCS) (previously the Soil Conservation Service), USDA Forest Service and Washington State University developed the PFLG using national soil survey standards. <http://data-wadnr.opendata.arcgis.com/datasets/wa-soils>
- **SJC Voluntary Stewardship Program (VSP) farm map.** The SJC Conservation District generated this map during the development of the VSP, a program to manage growth, protect critical areas, and maintain viable agriculture. The VSP farm map shows the location and type of agricultural occurring on existing farms in 2017 (Attachment C).

GMA Resource Land Designation Criteria

The GMA mandates that communities designate, conserve, maintain and enhance the integrity of resource lands. The GMA criteria for natural resource lands are provided in Chapter 365-190 WAC. In general, natural resource lands are characterized by three factors:

- The land is not already characterized by urban growth;
- The land is used or capable of being used for resource production; and
- The land has long term commercial significance.

GMA Criteria for Designating Agricultural Resource Lands

Long term commercial significance is determined differently on agricultural and forest resource lands. Eleven agricultural resource land criteria are established in WAC 365-190-050(3)(c):

“(c) The land has long-term commercial significance for agriculture. In determining this factor, counties and cities should consider the following nonexclusive criteria, as applicable:

- (i) The classification of prime and unique farmland soils as mapped by the Natural Resources Conservation Service;
- (ii) The availability of public facilities, including roads used in transporting agricultural products;
- (iii) Tax status, including whether lands are enrolled under the current use tax assessment under chapter 84.34 RCW and whether the optional public benefit rating system is used locally, and whether there is the ability to purchase or transfer land development rights;
- (iv) The availability of public services;

- (v) Relationship or proximity to urban growth areas;
- (vi) Predominant parcel size;
- (vii) Land use settlement patterns and their compatibility with agricultural practices;
- (viii) Intensity of nearby land uses;
- (ix) History of land development permits issued nearby;
- (x) Land values under alternative uses; and
- (xi) Proximity to markets.”

GMA Criteria for Designating Forest Resource Lands

WAC 365-190-060(2)(c), (3), and (4) establish the criteria for designating forest resource lands of long-term commercial significance:

“(c) The land has long-term commercial significance. When determining whether lands are used or capable of being used for forestry production, counties and cities should determine which land grade constitutes forest land of long-term commercial significance, based on local physical, biological, economic, and land use considerations. Counties and cities should use the private forest land grades of the department of revenue (WAC 458-40-530). This system incorporates consideration of growing capacity, productivity, and soil composition of the land. Forest land of long-term commercial significance will generally have a predominance of the higher private forest land grades. However, the presence of lower private forest land grades within the areas of predominantly higher grades need not preclude designation as forest land.

(3) Counties and cities may also consider secondary benefits from retaining commercial forestry operations. Benefits from retaining commercial forestry may include protecting air and water quality, maintaining adequate aquifer recharge areas, reducing forest fire risks, supporting tourism and access to recreational opportunities, providing carbon sequestration benefits, and improving wildlife habitat and connectivity for upland species. These are only potential secondary benefits from retaining commercial forestry operations, and should not be used alone as a basis for designating or dedesignating forest resource lands.

(4) Counties and cities must also consider the effects of proximity to population areas and the possibility of more intense uses of the land as indicated by the following criteria as applicable:

- (a) The availability of public services and facilities conducive to the conversion of forest land;

(b) The proximity of forest land to urban and suburban areas and rural settlements: Forest lands of long-term commercial significance are located outside the urban and suburban areas and rural settlements;

(c) The size of the parcels: Forest lands consist of predominantly large parcels;

(d) The compatibility and intensity of adjacent and nearby land use and settlement patterns with forest lands of long-term commercial significance;

(e) Property tax classification: Property is assessed as open space or forest land pursuant to chapter 84.33 or 84.34 RCW;

(f) Local economic conditions which affect the ability to manage timberlands for long-term commercial production; and

(g) History of land development permits issued nearby.”

Plan Designation Criteria

Section 2.3.D in Element 2, Land Use of the *Plan* includes the agricultural and forest resource land designation criteria. The agricultural resource land designation criteria are provided in Policy 2.3.D.5.a.1:

“(1) Lands in agricultural use which are characterized by the following criteria may be designated as Agricultural Resource Lands:

- i. Areas in parcels of ten acres or larger with soils capable of supporting long term commercial agricultural production. The federal Natural Resources Conservation Service (NRCS) identified 34 soil types suitable for farming in San Juan County. These soils can be found on page 121 of the 2009 Soil Survey of San Juan County, Washington, available at: http://soils.usda.gov/survey/online_surveys/washington/#san2009; or
- ii. Lands which meet the criteria in a. above which are under conservation easement for agricultural use or which are enrolled in the Open Space-Agriculture taxation program.”

This policy will be amended during the update for clarity. Any changes to the designation criteria will be incorporated into this methodology as needed. The recommended changes to clarify Policy 2.3.D.5(a)(1) include:

- Correcting the confusing reference to item “a” in item (i),
- The reference to the link for NRCS soil types in item (ii) must be removed because the link no longer works, and
- The “or” must be struck between items (i) and (ii) because it causes confusion. Based on a review of historic versions of this policy, it appears that this policy was always confusing and that the word “or” did not originally exist in the policy.

Policy 2.3.D.5.b.1 provides the criteria for designating forest lands:

“(1) Lands which are characterized by the following criteria may be designated Forest Resource Lands:

- i. are in Forest Land Grades 1-5 on the Department of Natural Resources Private Forest Land Grades map;
- ii. parcels are twenty acres or larger, or of a size meeting the Washington State requirements for timber open space designation;
- iii. are in a tax deferred status of Designated Forest Land or Open Space-Timber, or are state trust lands under forest management; and
- iv. are being managed for the long-term production of forest products with few non-forest related uses present.”

Phase One: Analyze All Parcels to Determine if they Meet the GMA Criteria

The central analysis of Phase One is calculating the long-term commercial significance index (LCSI). The LCSI is a metric that will help the County evaluate the relationship of each parcel to the GMA long-term commercial significance criteria. The method of calculating the LCSI for agricultural and forest resource lands is different for each type of resource. This is because the GMA long-term commercial significance criteria are specific to each resource.

A higher LCSI indicates an area is more commercially significant than an area with a lower score. The highest possible LCSI score is 50 points. An LCSI Z score per parcel will indicate the number of standard deviations each AG and FO LCSI score is from the mean. This metric indicates the degree to which a parcel is more or less commercially significant than other parcels. A positive Z score indicates that the parcel is more commercially significant than average. A negative Z score indicates that the parcel is less commercially significant than average.

To calculate the LCSI, each criterion will be assigned a score that indicates a degree to which the parcel is consistent with the GMA criteria. The score is multiplied by a weight assigned for each criterion. The weight modifiers are applied because some designation criteria have a greater influence on the potential for long-term commercial significance. The resulting total is the complete score for that criterion.

The process for calculating the LCSI is:

- Review each State designation criterion on each parcel.
- Identify the criterion factor applicable to the parcel.
- Multiply the score of the factor by the weight assigned to the State criterion.
- Do this for each criterion.
- Add the totals of the criterion scores for each parcel.
- The result is the Long-term Commercial Significance Index (LCSI).

Phase One, Step One: Long Term Commercial Significance Index (LCSI)

Phase One, Step One: Agricultural Resource Criteria

In Phase One, Step One, the GMA agricultural resource land long-term commercial significance criteria are quantified for each parcel. The end result of this step is a calculated AG LCSI for every parcel in the County.

Two criteria from the long-term commercial significance criteria listed in WAC 365-190-050(3)(c) were not assigned individual LCSI scores. The nonexclusive list of criteria in WAC 365-190-050 is specified to be considered “as applicable” (WAC 365-190-050(3)(c)). The criterion from WAC 365-190-050(3)(c)(x), land values under alternative uses, is not quantified into an LCSI score because it is reasonable to assume that land values under uses other than agriculture will always be higher. Land values under alternative uses are presumed higher because more intense uses (residential and commercial uses) are often more financially lucrative. The history of land development permits nearby (WAC 365-190-050(3)(c)(ix)) is not calculated on its own but is combined with consideration of land use settlement patterns and intensity of nearby land uses. These two factors are calculated based on the existing uses and surrounding parcel sizes which reflect the surrounding development history.

Weight Modifiers for Agricultural Resource Land GMA Designation Criteria

The numbers in the description of the assigned weight modifiers are refer to the number of the calculation outlined in the Phase One, Step One analysis of the GMA agricultural resource land designation criteria.

- **2X for soil and parcel size factors** [criteria 1 and 6]. These two factors are directly related to the characteristics of the parcel and its ability to support farming operations.
- **1.5X for enrollment in the current-use tax program and proximity to markets** [criteria 3 and 9]. Enrollment in the current-use tax program indicates that the parcel is currently supporting a productive farm. Given the limitations on access to markets on the outer islands, ferry service and on-island urban areas have an added influence on commercial significance in the County.
- **1.25X for surrounding land use patterns and nearby intensity of land uses** [criteria 7 and 8]. Higher-intensity uses and smaller surrounding lots are less compatible with commercial agriculture.
- **1X for access to roads, availability of public services, and proximity to UGAs** [criteria 2, 4, and 5]. These factors are important to consider but have the least influence on agriculture in the County. Access to roads is similar throughout most of the County, there are no freeways or highways and the whole County is served by the County road system. In the County, the difference between areas that are served by public services and those that are not is not as pronounced as other counties in Washington. Lands within UGAs will be removed from consideration in one of the next steps of this methodology.

Agricultural (AG) LCSl

The AG LCSl value will be the total calculated for each GMA designation criterion except as noted above. The maximum score possible is 50 points.

Table 1. *WAC 365-190-050(C) Agricultural Land Long-term Commercial Significance.

Criterion 1	
Criterion	The classification of prime and unique farmland soils as mapped by the NRCS (WAC 365-190-050(3)(c)(i))
Weight	X2
Factor Scores	
4	If more than 75% of parcel is prime farmland
3	If between 50 and 75% of parcel is prime farmland
2	If between 25 and 50% of parcel is prime farmland
1	If between 1 and 25% of parcel is prime farmland
0	If no prime farmlands

Criterion 2	
Criterion	The availability of public facilities, including roads used in transporting agricultural products (WAC 365-190-050(3)(c)(ii))
Weight	X1
Factor Scores	
4	If adjacent to public road
2	If within 1,000 feet of a public road
0	If more than 1,000 feet from a public road

Criterion 3	
Criterion	Tax status, including whether lands are enrolled under the current use tax assessment. (WAC 365-190-050(3)(c)(iii))
Weight	X1.5
Factor Scores	
4	If parcel in the current use farm and agriculture program
3	If parcel in open-space farm conservation program
0	If not in the current-use farm and agriculture or open-space farm conservation programs

Criterion 4	
Criterion	The availability of public services (WAC 365-190-050(3)(c)(iv))
Weight	X1
Factor Scores	
4	If outside a community water system and sewer system service area
2	If within a community water system service area and outside a sewer system service area
0	If within a community water system and sewer system service area

Criterion 5	
Criterion	Relationship or proximity to urban growth areas (WAC 365-190-050(3)(c)(v))
Weight	X1
Factor Scores	
4	If more than one-half mile away from a UGA
2	If between one half and one quarter mile of a UGA
0	If closer than one quarter mile or within a UGA

Criterion 6	
Criterion	Predominant parcel size (WAC 365-190-050(3)(c)(vi))
Weight	X2
Factor Scores	
4	If parcel larger than 20 acres
3	If parcel larger than 10 and less than 20 acres
2	If parcel larger than 5 and less than 10 acres
1	If parcel larger than 2 and less than 5 acres
0	If parcel less than 2 acres

Criterion 7	
Criterion	Land use settlement patterns and their compatibility with agricultural practices (WAC 365-190-050(3)(c)(vii))
Weight	X1.25
Factor Scores	
4	If average adjacent parcel size is 20 acres or larger
3	If average adjacent parcel size is larger than 10 and less than 20 acres
2	If average adjacent parcel size is larger than 5 and less than 10 acres
1	If the average adjacent parcel size is larger than 2 and less than 5 acres
0	If the average adjacent parcel size is less than 2 acres

Criterion 8	
Criterion	Intensity of nearby land uses (WAC 365-190-050(3)(c)(viii))
Weight	X1.25
Factor Scores	
4	If any neighboring parcel has AG or open space Assessor's use code
2	If any neighboring parcel has a single-family residential use code and no neighboring parcel has an AG or open space Assessor's use code
0	If no neighboring parcel has the use codes listed above.

Criterion 9	
Criterion	Proximity to markets (WAC 365-190-050(3)(c)(xi))
Weight	X1.5
Factor Scores	
4	If on San Juan, Lopez, or Orcas Islands
3	If on Shaw Island
1	If on Stuart, Waldron, Blakely, or Decatur Islands
0	If on any other island

*Washington Administrative Code (WAC). Source: Natural Resource Land Designation Review Methodology.

Phase One, Step One:

Long-Term Commercial Significance Index (LCSI) Deliverables for AG Resource Lands

The AG Resource Land LCSI will be calculated for all County parcels using GIS software. The results will be available in the following formats:

1. A map showing the AG LCSI score for each parcel in the County, and
2. A data table depicting the following for all parcels, showing at minimum:
 - Tax parcel number;
 - Acreage;
 - AG LCSI score for each criterion;
 - The total AG LCSI score; and
 - The AG LCSI Z score value. This score indicates how many standard deviations the value is above or below the mean for all parcels.

Table 2. Example Phase One, Step One: Data Table Columns for AG Resource Land LCSI*.

Parcel Number	Acres	LCSI Criterion 1	LCSI Criterion 2	LCSI Criterion 3	LCSI Criterion 4	LCSI Criterion 5	LCSI Criterion 6	LCSI Criterion 7	LCSI Criterion 8	LCSI Criterion 9	AG LCSI	AG LCSI Z Score

*LCSI stands for Long Term Commercial Significance Index

Phase One, Step One: Forest Resource Criteria

Weight Modifiers for Forest Land GMA Designation Criteria

To calculate the LCSI, each criterion will be assigned a score that indicates a degree to which the parcel is consistent with the GMA criteria. The score is multiplied by a weight assigned for each criterion. The weight modifiers are applied because some designation criteria have a greater influence on the potential for long-term commercial significance. The resulting total is the complete score for that criterion (raw score times eight equals complete score). The forest resource LCSI weight modifiers are:

- **2X for PFLG class, DFL or open-space tax class, and parcel size** [criteria 8, 5, and 3]. These three factors are directly related to the characteristics of the parcel and its ability to support forestry;
- **1.5X for proximity to UGAs and availability of public services** [criteria 1 and 2]. Lands served by public services and those near UGAs and activity centers will face additional pressure to develop with incompatible uses;
- **1.25X for history of nearby development and nearby development intensity** [criteria 4 and 7]. Higher-intensity uses and smaller surrounding lots are less compatible with commercial forestry. Parcels surrounded by smaller lots and nonresidential development will face pressure to develop with incompatible uses; and

- **1X for local economic conditions** [criterion 6]. Access to markets through ferry service and on-island UGAs and activity centers are lower-weight because harvested timber is not likely to be marketed locally and can be barged off-island.

Forest Resource Land (FO) Long-Term Commercial Significance Index (LCSI)

The FO LCSI value will be the total calculated for each GMA designation criteria listed below. The criteria are weighted to account for local circumstances in the County. The maximum score possible is 50 points.

Table 3: *WAC 365-190-060(4) Forest Resource Land Long-term Commercial Significance.

Criterion 1	
Criterion	The availability of public services and facilities conducive to the conversion of forest land. (WAC 365-190-060(4)(a))
Weight	X1.5
Factor Scores	
4	If outside a community water system and sewer system service area
2	If within a community water system service area and outside a sewer system service area
0	If within a community water system and sewer system service area

Criterion 2	
Criterion	The proximity of forest land to urban and suburban areas and rural settlements. (WAC 365-190-060(4)(b))
Weight	X1.5
Factor Scores	
4	If more than one-half mile away from an UGA, activity center, or LAMIRD
2	If between one half and one quarter mile of an UGA, activity center, or LAMIRD
0	If within an UGA, activity center, or LAMIRD

Criterion 3	
Criterion	The size of the parcels. (WAC 365-190-060(4)(c))
Weight	X2
Factor Scores	
4	If parcel larger than 20 acres
3	If parcel larger than 15 and less than 20 acres
2	If parcel larger than 10 and less than 15 acres
1	If parcel larger than 5 and less than 10 acres
0	If parcel less than 5 acres

Criterion 4	
Criterion	The compatibility and intensity of adjacent and nearby land use and settlement patterns with forest lands. (WAC 365-190-060(4)(d))
Weight	X1.25
Factor Scores	
4	If average adjacent parcel size is 20 acres or larger
3	If average adjacent parcel size is larger than 10 and less than 20 acres
2	If average adjacent parcel size is larger than 5 and less than 10 acres
1	If the average adjacent parcel size is larger than 2 and less than 5 acres
0	If the average adjacent parcel size is less than 2 acres

Criterion 5	
Criterion	Property tax classification. (WAC 365-190-060(4)(e))
Weight	X2
Factor Scores	
4	If parcel in the designated forestland (DFL) tax program
3	If parcel is in the open-space timber land tax program
0	If not in the DFL or open-space timber land tax program

Criterion 6	
Criterion	Local economic conditions which affect the ability to manage timberlands for long-term commercial production [interpreted as access to markets] (WAC 365-190-060(4)(f))
Weight	X1
Factor Scores	
4	If on San Juan, Lopez, Shaw, or Orcas Islands
3	If on Stuart, Waldron, Blakely, or Decatur Islands
0	If on any other island

Criterion 7	
Criterion	History of land development permits issued nearby (WAC 365-190-060(4)(g))
Weight	X1.25
Factor Scores	
4	If any neighboring parcel has forestry or open space Assessor's use code
2	If any neighboring parcel has a single-family residential or undeveloped use code and no neighboring parcel has a forestry or open space Assessor's use code
0	If any neighboring parcel has a commercial, industrial, or multi-family use code

Criterion 8	
Criterion	Private Forest Land Grade (PFLG) (WAC 365-190-060(2)(c))
Weight	X2
Factor Scores	
4	If any part of the parcel has PFLG 1
3	If any part of the parcel has PFLG 2
2	If any part of the parcel has PFLG 3
1	If any part of the parcel has PFLG 4
0	If PFLG is blank or 0

* Washington Administrative Code (WAC). Source: Natural Resource Land Designation Review Methodology.

Phase One, Step One:

Long-Term Commercial Significance Index (LCSI) Deliverables for FO Resource Lands

The Forest Resource Land LCSI will be calculated for all County parcels using GIS software. The results will be available in the following formats:

1. A map showing the FO LCSI score for each parcel throughout the County, and
2. A data table depicts the following for all parcels, showing at minimum:
 - Tax parcel number;
 - Acreage;
 - FO LCSI score for each criterion;
 - The total FO LCSI score for; and
 - The FO LCSI Z score value. This score indicates how many standard deviations the value is above or below the mean for all parcels.

Table 4. Example: Phase One, Step One, Data Table Columns for Forest Resource Land LCSI* Scores.

Parcel Number	Acres	LCSI Criterion 1	LCSI Criterion 2	LCSI Criterion 3	LCSI Criterion 4	LCSI Criterion 5	LCSI Criterion 6	LCSI Criterion 7	LCSI Criterion 8	FO LCSI	FO LCSI Z Score

*LCSI stands for Long Term Commercial Significance Index

Phase One, Step Two: Remove Parcels Characterized by Urban Growth from Consideration

One of the main GMA criteria for natural resource lands is that it not be characterized by urban growth. Urban growth is defined in RCW 36.70A.030(25):

(25) "Urban growth" refers to growth that makes intensive use of land for the location of buildings, structures, and impermeable surfaces to such a degree as to be incompatible with the primary use of land for the production of food, other agricultural products, or fiber, or the extraction of mineral resources, rural uses, rural development, and natural resource lands designated pursuant to RCW 36.70A.170. A pattern of more intensive rural development, as provided in RCW 36.70A.070(5)(d), is not urban growth. When allowed to spread over wide areas, urban growth typically requires urban governmental services. "Characterized by urban growth" refers to land having urban growth located on it, or to land located in relationship to an area with urban growth on it as to be appropriate for urban growth.

During Step Two, parcels within UGAs are removed from consideration for natural resource land designation. There are currently no designated resource lands within the three UGAs in the County. There are only a few places in the County where natural resource lands are adjacent to or nearly about a UGA. These lands near UGAs will be reexamined when staff makes a recommendation in Phase Four regarding designation to ensure that resource lands remain uncharacterized by urban growth.

Phase One, Step Three: Identify Parcels Used or Capable of Being Used for Resource Production

In this step, the maps developed in Step One are joined with maps identifying lands currently being used for resource production. The maps to be joined are:

- The map showing the AG LCSI score for each parcel from Phase One, step one;
- The map showing the FO LCSI score for each parcel from Phase One, step one;
- The SJC tax map showing parcels in Current Use Agriculture and Designated Forest Land tax programs; and
- The SJC Voluntary Stewardship Program (VSP) farm map.

Phase One, Step Three: Deliverables for AG and FO Resource Lands

1. Two maps showing:
 - Parcels that are in the Current Use Agriculture tax program or on the SJC VSP farm map. These parcels will be symbolized by their AG LCSI scores, and
 - Parcels that are in the Designated Forest Land (DFL) tax class. These parcels will be symbolized by their FO LCSI scores.
2. Corresponding data tables for the maps listed above showing the following for each parcel:
 - Tax parcel number;
 - Acreage;
 - Participation in the Current Use Agriculture program, DFL tax class, or on the VSP farm map;
 - AG and FO LCSI score for each criterion; and
 - The total AG and FO LCSI score for each parcel.

Table 5. Example Data Table Columns for Agricultural Resource Land Scores.

Parcel Number	Acreage	AG LCSI Score for each Criteria (9 total)	Total AG LCSI Score	Parcel in AG Open Space (Y/N)	Parcel on VSP Farm Map (Y/N)

*LCSI stands for Long Term Commercial Significance Index

Table 6. Example Data Table Columns for Forest Resource Land Scores.

Parcel Number	Acreage	FO LCSI Score for Each Criteria (8 total)	Total FO LCSI *Score	Parcel in Forestry Open Space (Y/N)	Parcel in DFL (Y/N)

*LCSI stands for Long Term Commercial Significance Index

Phase One Summary

Throughout Phase One, maps will be produced that will help the County evaluate the long-term commercial significance in different areas of the County. These maps will show regions with higher LCSI scores. Later, LCSI scores on parcels with current farm and forestry operations will be considered to establish what scores suggest the presence of commercial significance. These scores will provide a baseline understanding of what lands might be commercially significant.

In addition to considering maps, the LCSI scores of long-term commercial significance on each parcel will be compared relative to other parcels. Four metrics will be analyzed:

- Each parcel's AG and FO LCSI score;
- The mean AG and FO LCSI scores;
- The median AG and FO LCSI scores; and
- The Z scores for each parcel. The Z score is the number of standard deviations each AG and FO LCSI score is from the mean.

The measures of central tendency, the mean and median LCSI scores, will help the County understand what average commercial significance is. The Z scores will indicate the degree to which each parcel is more or less commercially significant than the average parcel. A positive Z score indicates that the parcel is more commercially significant than average. A negative Z score indicates that the parcel is less commercially significant than average. The County will use these metrics to decide what LCSI score indicates AG and FOR long-term commercial significance.

The following areas are expected to have AG and FO LCSI scores above the average and can help identify the range of scores that indicate the presence long-term commercial significance:

- Parcels participating in the current-use, open space, and DFL tax programs;
- Farms shown on the VSP current farm maps; and
- Larger residential or undeveloped parcels.

The following areas are expected to have AG and FO LCSI scores below the average and can help identify the range of scores that suggest an area does not have long-term commercial significance:

- Parcels in urban growth areas and activity centers;
- Small parcels developed with residential uses; and
- Parcels on the smaller outer islands such as Center Island.

Above and below average AG and FO LCSI scores will factor into the identification of a preliminary list of natural resource land designation changes on individual parcels at the end of Phase Two. The preliminary list will be refined by public input during Phase Three. After that, staff will perform in-depth and area-specific analysis of potential changes during Phase Four. That in-depth analysis will inform any amendments to natural resource land designations adopted during the *Plan* update.

Phase Two: Analyze All Parcels: Do they Meet the *Plan* Criteria?

During Phase Two, all parcels on the Official Maps will be compared with the results of Phase One for conformity to the *Plan* designation criteria (Element 2, Land Use, Policy 2.3.D.5.a and b). Phase Two will result in a preliminary list of parcels that may qualify for designation or de-designation as natural resource lands. Phase Two has the following three steps:

- **Step One:** divide Phase One results into lands that are and are not designated natural resource lands on the Official Maps;
- **Step Two:** review parcels for whether or not they meet the *Plan* criteria; and
- **Step Three:** develop a preliminary list of parcels that may qualify for designation or de-designation as natural resource lands based on GMA and *Plan* criteria.

Phase Two, Step One: Divide Phase One Results into Parcels That Are and Are Not Designated Natural Resource Land on the Official Maps

In Phase Two, Step One, the Phase One results are separated into lands that are and are not designated natural resource land. This will allow comparison of the LCSi scores between designated and not designated natural resource lands in Phase Two, Step 3. Phase Two, Step One tasks include:

1. Identify parcels from Phase One that are and are not designated Agricultural Resource (AG) on the Official Maps.
 - a. Divide Phase One, Step One AG LCSi parcels into those that are and are not designated AG.
 - b. Divide Phase One, Step Three AG LCSi parcels with existing farms into those that are and are not designated AG.
2. Identify parcels from Phase One that are and are not designated Forest Resource (FO) on the Official Maps.
 - a. Divide Phase One, Step One FO LCSi parcels into those that are and are not designated FO.
 - b. Divide Phase One, Step Three FO LCSi parcels with current forestry operations into those that are and are not designated FO.

Phase 2, Step One: Deliverables

Four maps showing:

1. AG LCSi scores, divided into;
 - a. Parcels designated AG;
 - b. Parcels not designated AG;
2. AG LCSi scores on existing farms, divided into;

- a. Parcels designated AG with existing farms;
 - b. Parcels not designated AG with existing farms;
3. FO LCSi scores, divided into;
 - a. Parcels designated FO;
 - b. Parcels not designated FO;
4. FO LCSi scores on parcels with existing forestry operations, divided into;
 - a. Parcels designated FO with existing forestry operations; and
 - b. Parcels not designated FO with existing forestry operations.
5. Data tables for each map providing for each parcel, at minimum the:
 - Tax parcel number;
 - Acreage;
 - Land use designation;
 - AG and FO LCSi score for each GMA criterion;
 - The total AG and FO LCSi score; and
 - The AG and FO LCSi Z score.

Table 7. Example Phase Two, Step One, Data Table Columns for Agricultural Resource Lands.

Parcel Number	Parcel Acreage	Land Use Designation	LCSi Score for Each Criteria (9 total)	Total LCSi Score	Total LCSi Z Score

*LCSi stands for Long Term Commercial Significance Index

Table 8. Example Phase Two, Step One, Data Table Columns for Forest Resource Lands.

Parcel Number	Parcel Acreage	Land Use Designation	LCSi Score for Each Criteria (9 total)	Total LCSi Score	Total LCSi Z Score

*LCSi stands for Long Term Commercial Significance Index

Step Two: Review for Consistency with *Plan* Criteria

Phase Two, Step Two results identify lands that do or do not meet the *Plan* designation criteria in Element 2, Land Use, Policies 2.3.D.5.a and b using the following tasks:

Agricultural Resource Lands

1. Locate all parcels that meet the AG designation criteria in the *Plan*.

- a. Select all parcels that are both larger than ten acres and have NRCS prime farmland soils. Create a new GIS layer from the selected parcels.
- b. From the created in task (1)(a) above, select all parcels that are also under an agriculture conservation easement or enrolled in the current-use agriculture tax program. Create a new GIS layer from the selected parcels.
- c. Identify all other parcels that do not meet the *Plan's* AG designation criteria on the map created in b above.

Forest Resource Lands

2. Locate all parcels that meet the FO designation criteria in the *Plan*.
 - a. Select parcels that have all four of the following characteristics:
 - i. Parcels with PFLG 1 - 4;
 - ii. Parcels 20 acres or larger;
 - iii. Parcels with Designated Forest Land or enrolled in the Open Space Timber tax program; and
 - iv. Parcels with forestry Assessor's use codes.
 - b. Create a new map layer from the parcels selected in Task (2)(a) above. These parcels meet the *Plan's* designation criteria.
 - c. Identify all other parcels that do not meet the *Plan's* FO designation criteria on the map above.

Phase Two, Step Two Deliverables

1. Five maps showing:
 - a. Parcels that meet the first AG designation criterion [parcels > 10 acres with NRCS farmland soils];
 - b. Parcels that meet the second AG designation criterion [parcels > 10 acres, with NRCS farmland soils, and enrolled in the Current-Use Agriculture tax program];
 - c. Parcels that do not meet the AG designation criteria;
 - d. Parcels that meet the *Plan's* FO designation criteria; and
 - e. Parcels that do not meet the *Plan's* FO designation criteria.
2. Data tables for each map showing for all parcels, at a minimum:
 - Tax parcel number;
 - Acreage;
 - Land use designation; and
 - Whether the parcel meets the *Plan's* AG or FO designation criteria.

Table 9. Example Phase Two, Step Two Data Table for Agricultural Resource Lands.

Parcel Number	Parcel Acreage	Land Use Designation	Does the Parcel Meet AG Designation Criterion 1 (Y/N)	Does the Parcel Meet AG Designation Criterion 2 (Y/N)

Source: Natural Resource Land Designation Review Methodology.

Table 10. Example Phase Two, Step Two Data Table for Forest Resource Lands.

Parcel Number	Parcel Acreage	Land Use Designation	Meet FO Designation Criterion 1 (Y/N)	Meet FO Designation Criterion 2 (Y/N)	Meet FO Designation Criterion 3 (Y/N)	Meet FO Designation Criterion 4 (Y/N)	Meet all 4 FO Designation Criterion (Y/N)

Source: Natural Resource Land Designation Review Methodology.

Step Three: LCSI on Lands That Meet *Plan* Natural Resource Land Designation Criteria

Phase Two, Steps One and Two are compared with each other to establish AG and FO LCSI scores for lands that do and do not meet the *Plan* criteria. Phase Three, Step Three will show the degree to which lands that meet and do not meet the *Plan* criteria have long-term commercial significance. A preliminary list of parcels that are candidates for designation or de-designation as natural resource lands will be developed. The following tasks compose Step Three:

1. Combine the maps from Phase Two, Step One showing AG LCSI on parcels that are and are not designated AG with the maps from Phase Two, Step Two that show lands that may or may not meet the *Plan*'s AG designation criteria. The resulting maps will show lands that are:
 - a. All parcels that are:
 - i. Designated AG on the Official Maps and meet the *Plan* criteria, symbolized by AG LCSI;
 - ii. Not designated AG on the Official Maps and meet the *Plan* criteria, symbolized by AG LCSI;
 - iii. Designated AG on the Official Maps and do not meet the *Plan* criteria, symbolized by AG LCSI; and
 - iv. Not designated AG on the Official Maps and do not meet the *Plan* criteria, symbolized by AG LCSI.
2. Combine the maps from Phase Two, Step One showing FO LCSI on parcels that are and are not designated FO with maps from Phase Two, Step Two that show lands that may or may not meet the *Plan*'s FO designation criteria. The resultant map(s) will show lands that are:
 - a. All parcels that are;

- i. Designated FO on the Official Maps and meet the Plan criteria, symbolized by FO LCSI;
 - ii. Not designated FO on the Official Maps and meet the Plan criteria, symbolized by FO LCSI;
 - iii. Designated FO on the Official Maps and do not meet the Plan criteria, symbolized by FO LCSI; and
 - iv. Not designated FO on the Official Maps and do not meet the Plan criteria, symbolized by FO LCSI.
- 3. Use the maps created in Phase Two, Steps Three - Tasks 1 and 2 to identify a preliminary list of candidate parcels for designation changes. Preliminary candidate lands for designation changes are those that are:
 - a. **Candidates for de-designation.** Designated AG or FO on the Official Maps that do not meet the *Plan* criteria and have a lower LCSI score relative to other parcels [designated, do not meet criteria, and have low commercial significance], and
 - b. **Candidates for designation as a natural resource land.** Not designated AG or FO on the Official Maps, meet the *Plan* criteria, and have a higher LCSI score relative to other parcels [meet the criteria and have high commercial significance].
- 4. Use the data and maps from Phase Two, Tasks 1 and 2 to identify a preliminary list of parcels for further discussion. Further discussion is needed because these parcels appear to meet either the *Plan* or GMA criteria, but not both. Parcels whose designation should be discussed are those:
 - a. Designated AG or FO on the Official Maps that do not meet the *Plan* criteria and have a higher LCSI score relative to other parcels [designated, do not meet the criteria, and have a high commercial significance]. These are lands that may or may not be designated as natural resource lands;
 - b. Designated AG or FO on the Official Maps, meet the *Plan* criteria, and have a lower LCSI score relative to other parcels [designated, meets criteria, and low commercial significance]. These are lands that may or may not be designated as natural resource lands;
 - c. Not designated AG or FO on the Official Maps, meet the *Plan* criteria, and have a lower LCSI score relative to other parcels [not designated, meets criteria, and have a low commercial significance]. These are lands that may or may not be designated as natural resource lands; and
 - d. Not designated AG or FO on the Official Maps, do not meet the *Plan* criteria, and have a higher LCSI score relative to other parcels [not designated, do not meet criteria, and have a higher commercial significance]. These are lands that may or may not be designated as natural resource lands.
- 5. Use the maps created in Phase Two, Step Three -Tasks 1 and 2 to identify lands that are probably not candidates for designation changes. These are lands that are:
 - a. Not designated AG or FO on the Official Maps, do not meet the *Plan* criteria, and have a lower LCSI score relative to other parcels [not designated, do not meet the criteria, and have a lower commercial significance], and
 - b. Designated AG or FO on the Official Maps, meet the *Plan* criteria, and have a higher LCSI score relative to other parcels [designated, meet criteria, and high commercial significance].

Table 11. Parcel Categorization in Phase Two, Step Three.

Parcels that are:	Higher LCSI* Score	Lower LCSI* Score
Designated & meet criteria	Don't change designation (5.b)	Maybe change designation (4.b)
Designated & do not meet criteria	Maybe change designation (4.a)	Change designation (de-designate) (3.a)
Not designated & meet criteria	Designate as resource lands (3.b)	Maybe change designation (4.c)
Not designated & do not meet the criteria	Maybe change designation (4.d)	Not natural resource lands (5.a)

*LCSI stands for Long Term Commercial Significance Index, see Phase One.

Step Three: Deliverables

Maps showing:

1. Preliminary candidate lands for land use designation changes. These are lands that are either:
 - a. Designated, do not meet the *Plan* criteria, and have a lower LCSI score, or
 - b. Not designated, meets the *Plan* criteria, and have a higher LCSI score.
2. Parcels that require further discussion. Further discussion is needed because these parcels appear to meet either the *Plan* or GMA criteria, but not both. These parcels are:
 - a. Designated, do not meet the *Plan* criteria, and have a higher commercial significance;
 - b. Designated, meets the *Plan* criteria, and have a lower commercial significance;
 - c. Not designated, meets the *Plan* criteria, and have a lower commercial significance; or
 - d. Not designated, do not meet the *Plan* criteria, and have a higher commercial significance.
3. Lands that are probably not candidates for designation changes. These are parcels that are:
 - a. Not designated, do not meet the criteria, and have a lower commercial significance, and
 - b. Designated, meet criteria, and high commercial significance.
4. Data tables for the parcels on each map showing at a minimum the:
 - Tax parcel number;
 - Acreage;
 - Land use designation;
 - AG and FO LCSI score; and
 - Whether the parcel meets the *Plan's* AG or FO designation criteria.

Table 11. Example Phase Two, Step Three, Data Table for Agricultural Resource Lands.

Parcel Number	Parcel Acreage	Land Use Designation	LCSI Score for Each Criteria (9 total)	Total AG LCSI Score	Does the Parcel Meet the AG Designation Criteria (Y/N)

*LCSI stands for Long Term Commercial Significance Index

Table 12. Example Phase Two, Step Three, Data Table for Forest Resource Lands.

Parcel Number	Parcel Acreage	Land Use Designation	FO LCSI Score for Each Factor (8 total)	Total FO LCSI Score	Does the Parcel Meet the FO Designation Criteria (Y/N)

*LCSI stands for Long Term Commercial Significance Index

Phase Three: Public Input

The County Council, Planning Commission and the public, including stakeholder groups, will be briefed on the Phase Two results. Specific feedback will be requested about the parcels that have potential for de-designation, or designation as a resource land and those parcels that may have ambiguous results. Ambiguous parcels are those that meet either the GMA or Plan criteria but not both. An example of ambiguous results are parcels that are designated natural resource lands, meet the *Plan* criteria, but have low commercial significance (do not meet GMA criteria).

The four types of results marked for further discussion are not clear-cut yes or no for designation. The discussion with stakeholders, Council, and PC will clarify what should be done with these parcels in the grey area. The County Council, Planning Commission, and stakeholder groups will provide their local knowledge to help clarify the following:

- Whether areas with ambiguous results are currently used for agricultural and forestry operations, and
- If these areas could be used for resource production.

Phase Three, Step One: Brief the Agricultural Resources Committee (ARC) and SJI Conservation District (CD)

After a briefing, the ARC and CD will be asked for a recommendation about the parcels identified in Phase Two that need additional discussion:

1. Designated AG or FO on the Official Maps that do not meet the *Plan* criteria and have an LCSI score at or above the threshold set in Phase One [designated, do not meet the *Plan* criteria, and have a high commercial significance];
2. Designated AG or FO on the Official Maps, meet the *Plan* criteria, and have an LCSI score below the threshold set in Phase One [designated, meets *Plan* criteria, and low commercial significance];
3. Not designated AG or FO on the Official Maps, meet the *Plan* criteria, and have an LCSI score below the threshold set in Phase One [not designated, meets *Plan* criteria, and have a low commercial significance]; and
4. Not designated AG or FO on the Official Maps, do not meet the *Plan* criteria, and have an LCSI score above the threshold set in Phase One [not designated, do not meet criteria, and have a higher commercial significance].

After considering the lands identified for additional discussion, the ARC and CD will be asked to make a recommendation about the parcels identified in Phase Two as:

1. **Candidates for de-designation:** designated AG or FO, do not meet the designation criteria, and have a lower commercial significance, and
2. **Candidates for designation:** Not designation AG or FO, meet the designation criteria, and have a higher commercial significance.

Finally, these stakeholders can provide their knowledge of existing farms that may have been missed in the first two phases of this analysis. These parcels will already have an AG LCSI calculated in Phase One and can be evaluated for consistency with the *Plan* designation criteria. Staff will consider their recommendations when preparing a recommendation in Phase Three, Step Two.

Phase Three, Step Two: Brief the County Council and Planning Commission

Placeholder

Phase Four: Prepare Detailed Analysis

During Phase Four, the parcels identified as candidates for changes to land use designation in the previous phases will be further analyzed for consistency with the GMA and *Plan* requirements. This review will take a closer look at the designation criterion and document the specific details such as explicit documentation of surrounding land use and permit from the relevant WAC and *Plan* policies for those parcels. Once the possible changes have been analyzed, staff will develop natural resource land designation alternatives to be considered with the *Plan* update.

Phase Four has two primary steps:

1. Analyze possible designation changes developed in the previous phases, and
2. Develop natural resource land designation alternatives.

Phase Four, Step One: In-depth Analysis

A preliminary list of candidates for designation changes was developed in the previous phases of this review. In Phase Four, Step One, these candidates will be given an in-depth review for consistency with the GMA and *Plan* natural resource land designation criteria. This in-depth review will help staff determine their recommendation for designation changes.

Tables 13 and 14 provide an example of the tables that will be used for in-depth analysis on individual parcel or clusters. These tables will be completed for all areas proposed for either designation or de-designation as natural resource lands.

Alternatives will need to be specifically reviewed for consistency with the GMA and *Plan* designation criteria.

Table 13. In-Depth Agricultural Resource Land Review Matrix.

Description of Area:	TPN:
	Surrounding Land Uses:
Criteria	Area Characteristics
WAC 365-190-050(3)(a) The land is not already characterized by urban growth. To evaluate this factor, counties and cities should use the criteria contained in WAC 365-196-310.	The area is X miles from the nearest UGA and is only developed at a density of 1 dwelling unit per X acres.
WAC 365-190-050(3)(b) The land is used or capable of being used for agricultural production. This factor evaluates whether lands are well suited to agricultural use based primarily on their physical and geographic characteristics. Some agricultural operations are less dependent on soil quality than others, including some livestock production operations.	Approximately X percent of the acreage in this area is in the current-use agriculture taxation program. There are X parcels in this area shown on the VSP farm map (Exhibit X). Lands in the current-use agriculture taxation program and those shown on the VSP farm map are currently being used for agricultural production.
WAC 365-190-050(3)(b)(i) Lands that are currently used for agricultural production and lands that are capable of such use must be evaluated for designation. The intent of a landowner to use land for agriculture or to cease such use is not the controlling factor in determining if land is used or capable of being used for agricultural production. Land enrolled in federal conservation reserve programs is recommended for designation based on previous agricultural use, management requirements, and potential for reuse as agricultural land.	As noted above, much of this area is currently being used for agricultural production. The remainder of this area is being analyzed for whether it is capable of being used for agricultural production regardless of the property-owner's intent.
WAC 365-190-050(3)(b)(ii) In determining whether lands are used or capable of being used for agricultural production, counties and cities shall use the land-capability classification system of the United States Department of Agriculture Natural Resources Conservation Service as defined in relevant Field Office Technical Guides. These eight classes are incorporated by the United States Department of Agriculture into map units described in published soil surveys, and are based on the growing capacity, productivity and soil composition of the land.	

WAC 365-190-050(3)(c) The land has long-term commercial significance for agriculture. In determining this factor, counties and cities should consider the following nonexclusive criteria, as applicable:	This area [does or does not] have long-term commercial significance, see analysis of each criterion below.
WAC 365-190-050(3)(c)(i) The classification of prime and unique farmland soils as mapped by the Natural Resources Conservation Service	About X percent of this area has soils classified as prime farmland on the NRCS soil survey (Exhibit X).
WAC 365-190-050(3)(c)(ii) The availability of public facilities, including roads used in transporting agricultural products	This area [is or is not] on a ferry served island. The County road and WA State Ferry systems provide this area with public facilities used in transporting agricultural products (Exhibit X).
WAC 365-190-050(3)(c)(iii) Tax status, including whether lands are enrolled under the current use tax assessment under chapter 84.34 RCW and whether the optional public benefit rating system is used locally, and whether there is the ability to purchase or transfer land development rights	More than X percent of the acreage in the area is in current use taxation (Exhibit X).
WAC 365-190-050(3)(c)(iv) The availability of public services;	The area has access to police, fire, parks, and schools in the County. Response times for emergency services are potentially greater in the further reaches of the County.
WAC 365-190-050(3)(c)(v) Relationship or proximity to urban growth areas	This area [is or is not] within an urban growth area. [If outside a UGA] The area is about X miles from the nearest UGA.
WAC 365-190-050(3)(c)(vi) Predominant parcel size	The average parcel size in this area is X acres. About X percent of parcels are between 5 and 20 acres (Exhibit X).
WAC 365-190-050(3)(c)(vii) Land use settlement patterns and their compatibility with agricultural practices	This area abuts a [forest resource, rural area, activity center, or UGA] (Exhibit X). Agriculture is an allowed use in rural areas and activity centers, which is compatible with the agricultural practices.
WAC 365-190-050(3)(c)(viii) Intensity of nearby land uses	The majority of land in rural areas is either undeveloped or developed with single-family residences on larger parcels (Exhibit X). This intensity is compatible with agricultural uses.

WAC 365-190-050(3)(c)(ix) History of land development permits issued nearby	Based on a review of San Juan County GIS information, building, land use, and subdivision permits are more prevalent in UGAs than in the surrounding rural and natural resource areas (Exhibit X).
WAC 365-190-050(3)(c)(x) Land values under alternative uses	Land values for non-agricultural uses are higher than for agricultural uses. This is why approximately X percent of property owners participate in the current use taxation program (Exhibit X).
WAC 365-190-050(3)(c)(xi) Proximity to markets	This area is approximately X miles from [the nearest UGA] and [is or is not] on a ferry served island. The County road and WA State Ferry systems provide this area with access to markets for agricultural products.

Source: Natural Resource Land Designation Review Methodology.