



Ms. Maia D. Bellon  
Washington Department of Ecology  
300 Desmond Drive  
Lacey, Washington 98503

September 11, 2013

Dear Director Bellon,

I am writing to strongly urge that the Department of Ecology incorporate the questions in your "SEPA Checklist Guidance for Impacts to Agricultural Lands" in the required SEPA environmental checklist through your 2013 rulemaking process.

I understand that it has been suggested that SEPA requirements are redundant and unnecessary because the Growth Management Act provides sufficient protection for farmland. This is definitely not the case. While the GMA does provide sufficient authority for counties to designate and protect farmland, it also provides tremendous discretion to counties on the stringency of these requirements. In some Washington counties, there is little to no control over the conversion of farmland to non-agricultural uses.

American Farmland Trust conducted a systematic analysis of county farmland protection policies and programs in the 12 counties surrounding Puget Sound in 2011-12. The differences among the counties could not have been more stark. Several of the counties have exemplary programs, with a very effective mix of strong farm zoning, tight urban growth areas, and programs to remove development rights from farms, but others have the bulk of their farmland in general purpose rural zones with few constraints on conversion of farmland to residential and commercial uses. Overall, we found that only half of the actively farmed land in the region is even designated as agricultural land.

While I think that most farmland advocates in the region believe that GMA could be an effective tool to protect farmland, it is far from adequate at the moment. The addition of farm-specific questions in the SEPA checklist would be a valuable addition, requiring the disclosure of impacts to agricultural land. In time, it would be great to see strong state policy that requires that such impacts are avoided, minimized, and compensated where necessary.

Thank you for the opportunity to comment on this important policy issue. If you have questions or comments, please don't hesitate to contact me at [dcanty@farmland.org](mailto:dcanty@farmland.org) or 206-860-4222.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dennis Canty". The signature is fluid and cursive, with the first name "Dennis" written in a larger, more prominent script than the last name "Canty".

Dennis Canty  
Pacific Northwest Regional Director