

From Bonnie Blessing to Dept of Ecology
25 November 2025

re: Definitions of agricultural viability are confusing
If I understand the VSP correctly:

The VSP is intended to maintain the viability of agriculture. Those who participate propose to use Best management practices to protect Critical areas. What is unclear to me is just who can qualify for VSP, which in turn, seems to allow a fair bit of flexibility in implementation of CAOs. It also seems there should be monitoring done to see if the buffers are working or voluntary BMPs work at all. But its confidential so who really knows?

What is the RCW definition of farm and agricultural land?

I believe that to qualify for VSP, one must demonstrate that they have farm and agricultural land. RCW 84.34 says that which is a parcel of land 5 or more acres devoted to ag that has a gross \$100.00 income per year for 3 of the past 5 years.

(more info at <https://rco.wa.gov/wp-content/uploads/2019/05/WWRP-FP-Manual10f.pdf>)

How does this definition of ag land (above) compare with a definition of a ‘qualified farmer’?

A recent definition from Feldman¹ is:

Qualified Farmer means, but is not limited to, a person who, or legal entity which, either (i) (a) may reasonably be expected to earn more than one-half of his, her, her, their or its annual adjusted gross income from the “business of farming”, on the Property or other properties in their ownership, as farming is defined in Treasury Regulation Section 1.175-3 (or any successor regulation) or (b) possesses a bona-fide and feasible business plan for agricultural operations on the Property, or (ii) is a land trust, co-op or other entity established for the purposed of providing and preserving farmland access. Notwithstanding the foregoing, Grantee shall make the final determination of the qualification of a proposed purchaser as a Qualified Farmer based on, but not limited to, the above requirements, and proof of demonstrated farming or training or both.

(153 Extracted from Conservation Easement for Working Farmland with Sale Restrictions, by and between Emily Renee Cooper and Jacob Robert Wasson as grantors, East Multnomah Soil and Water Conservation District as grantee, dated November 10, 2022)

¹https://cdn.prod.website-files.com/5faf8a950cdaa224e61edad9/67354317d69719a35a12ea4c_NEWS%20-%20OFP%20-%20Memorandum%20to%20WSSC%20Affordability%20Mechanism%20Analysis%20-%206.28.24.pdf

Do local farmers even benefit from reduced regs on ag?

Its unclear that the big exporters of hay benefit from reduced regulations or are even local farmers. WA exports massive amts of hay and other products. WA state hay growers presentation (by Putnam 2023) says that alfalfa benefits water and wildlife and is profitable (in CA alfalfa is worth 1800 per acre) and says alfalfa is the best in droughty situations. This is confusing as a lot of water is used. Is this correct?

What could be done if farms meet the RCW definition but not the qualified farmer standard?

Can the state somehow encourage the VSP program to protect more critical areas? For instance, promote more conservation buffers. Or promote alternative forage that shades the soil like hazelnut leaves: (<https://www.sciencedirect.com/science/article/pii/S0377840120306957>).

Timber and fish were magnets that brought people here. Its time to give back to fish a bit. How long can we keep using fish, having recreational fisheries and growing them artificially without losing them entirely?

Wild fish escapement goals are nowhere being met². Freshwater habitat has to improve. The water is way warm in the summer. Is there a way to fix this a bit? If we're giving money to folks to fence the riparian area can the buffer be even some sort of percentage of historical? Are there other ways to provide income to people than haying and fishing? I appreciate the need for domestic production of livestock forage. I get that. Does the hay stay here or is it shipped overseas anyways?

http://www.chehalisleadentity.org/wp-content/uploads/Beamesderfer_Ray_Chehalis-All-H-report-final_2023.pdf

²http://www.chehalisleadentity.org/wp-content/uploads/Beamesderfer_Ray_Chehalis-All-H-report-final_2023.pdf