

Exhibit A - Current MRL Designation Criteria

Mineral Resource Lands (MRL) – Designation Criteria

Non-Metallic Mineral Deposits

General Criteria

1. Non-metallic deposits must contain at least 1,000,000 cubic yards of proven and extractable sand, gravel, or rock material per new MRL Designation.
2. Minimum MRL Designation size is twenty acres.
3. Expansion of an existing MRL does not need to meet criteria 1 or 2.
4. MRL Designation status does not apply to surface mines permitted as an accessory or conditional use for the purpose of enhancing agriculture or facilitating forestry resource operations.
5. All pre-existing legal permitted sites meeting the above criteria will be designated.
6. The site shall have a proven resource that meets the following criteria:
 - Construction material must meet current WSDOT Standard Specifications for common borrow criteria for road, bridge and municipal construction, or Whatcom County standards for other uses.
 - Sand and gravel deposits must have a net to gross ratio greater than 80% (1290 cy/acre/foot).
7. MRL Designations must not be within nor abut developed residential zones or subdivisions platted at urban densities.
8. MRL Designations must not occur within the 10 year zone of contribution for designated wellhead protection areas, as approved by the State Department of Health for Group A systems, and by the Whatcom County Health Department for Group B systems, in accordance with source control provisions of the regulations on water system comprehensive planning. MRL designations may be modified if a wellhead protection area delineated subsequent to MRL designation encompasses areas within a designated MRL. If a fixed radii method is used to delineate a wellhead protection area, the applicant may elect to more precisely delineate the wellhead protection boundary using an analytical model; provided, that the delineated boundary proposed by the applicant is prepared by a professional hydrogeologist; and further provided, that the delineated boundary has been reviewed and approved by the Washington State Department of Health for Group A systems, and by the Whatcom County Health Department for Group B systems. The hydrogeologist shall be selected by mutual agreement of the county, water purveyor, and applicant; provided, if agreement cannot be reached the applicant shall select a consultant from a list of no less than three qualified consultants supplied by the county and water purveyor.
9. MRL Designation should not enclose by more than 50% non-designated parcels.
10. Site-specific MRL designations shall only be approved after mineral extraction impacts have been anticipated and evaluated, and potential adverse

environmental impacts have been addressed through appropriate mitigation and/or reasonable alternatives.

11. MRL Designations must be reviewed for internal consistency with other parts of the comprehensive plan so that the MRL designation does not preclude achievement of other parts of the comprehensive plan.
12. Expansion of MRL Designations to parcels contiguous to, and held by more than 1% common beneficial ownership or beneficial interest with an existing mine is allowed, but before extraction of the additional area may commence the existing mine must be in complete compliance with all operating permits and regulations.

Additional Criteria for Designated Urban and Rural Areas

13. Abutting parcel size density must not exceed one unit per nominal five acres for more than 25% of the perimeter of the site unless project specific mitigation is created.

Additional Criteria for Designated Forestry Areas

14. Must demonstrate higher value as mineral resource than forestry resource based upon:
 - soil conditions.
 - quality of mineral resource.
 - sustainable productivity of forest resource.

Additional Criteria for Designated Agricultural Areas

15. Prohibit MRL designations in areas designated Agriculture by the Whatcom County Comprehensive Plan that contain “Prime Farmland Soils” determined by the Natural Resource Conservation Service.

River and Stream Gravel

16. MRL Designation status applies to river gravel bars possessing necessary permits and containing significant quality reserves.
17. MRL Designation status may apply to those upland sites located in proximity to river gravel sources and used primarily for handling and processing significant amounts of river gravel.

Metallic and Industrial Mineral Deposits

18. For metallic and rare minerals, mineral designation status extends to all patented mining claims.
19. Mineral Resource Designation status extends to all currently permitted industrial mineral deposits of long-term commercial significance.
20. All other non-patented mineral deposits must meet the non-metallic MRL Designation criteria, numbers 6 through 15, as applicable.

Mineral Resources – Site Selection Method

1. Sites meeting Mineral Resources Designation Criteria 1-5 (and areas enclosed by these sites greater than 50%).
2. Sites requested by owner or operator meeting designation criteria.

Exhibit B - SMAC recommended Comprehensive Plan amendments.

Comprehensive Plan Amendments

Mineral Resources

Introduction

Purpose

Process

In 1990, the Washington State Legislature passed the Growth Management Act. One of the goals of the act is to maintain and enhance resource-based industries.

The Act mandates that each county planning under the Act classify and designate mineral resource lands of long term commercial significance.

To address the mandates of the Growth Management Act, Whatcom County formed a Surface Mining Citizens' Advisory Committee in the 1990s to produce, through a consensus process, the issues, goals, and policies found in this chapter. Planning staff drafted the sub-section on mineral designations following review and comments from the committee.

In 1992, Whatcom County adopted an Interim Classification of Mineral Resources provided by the Washington State Department of Natural Resources. This classification system, as well as existing resource information, was used for the interim designation of mineral resource lands of long-term commercial significance. Through their involvement, the Surface Mining Advisory Committee recommended a longer planning horizon, which would require additional mineral resource areas. Additional MRLs were, in fact, designated when the Comprehensive Plan was adopted in 1997.

Since 1997, amendments for MRL designation have been landowner initiated, including two proposed Comprehensive Plan amendments to expand existing MRL designations which met designation criteria but were ultimately denied through the legislative process.

In response, as part of the review of MRL comprehensive Plan and Zoning Text amendments in October 2014, the Whatcom County Planning commission strongly recommended that Whatcom County take a lead role in designating mineral resource lands of long-term commercial significance in order to protect the resource from incompatible uses, as opposed to the presently unpredictable landowner initiated amendments. During the 2016 Comprehensive Plan update, the County Council adopted policies supporting a more pro-active approach to MRL designation. In 2018, the Whatcom County Surface Mining Advisory Committee began a countywide assessment seeking to identify and designate potential commercially significant mineral resource lands.

GMA Requirements

Background Summary

Issues, Goals and Policies

General Issues

Goal 8K: **Sustain and enhance, when and where appropriate, Whatcom County's mineral resource industries, support the conservation of productive mineral lands, and discourage incompatible uses upon or adjacent to these lands.**

Policy 8K-4: Support the implementation of clustering at the time of subdivision or parcel boundary alteration. The clustering provisions allow development on one portion of a parcel, while leaving the remainder of the parcel available for mineral resource productivity.

Goal 8L: **Ensure mineral extraction industries do not adversely affect the people and other properties in the vicinity, by establishing appropriate and beneficial designation and resource conservation policies, while recognizing the rights of all property owners.**

Policy 8L-9: Surface mining subject to the Surface Mining Act should be prohibited within the 10-year travel time zone of wellhead protection areas, as approved by the State Department of Health for Group A systems and by the Whatcom County Health Department for Group B systems.

Rural and Urban Areas

Many of the rural areas in Whatcom County have been and are being used for mineral extraction. Low density rural areas with potential natural resources such as sand and gravel may be able to accommodate a variety of uses, and surface mining has been a traditional use. Significant mineral deposits occur in certain parts of the rural areas. Some of these areas have higher surrounding residential densities than others, and many rural residents expect less intrusive forms of land uses. Determining which areas are the most appropriate for mineral extraction is a difficult and challenging task.

Goal 8M: **Achieve a balance between the conservation of productive mineral lands and the quality of life expected by residents within and near the rural and urban zones of Whatcom County.**

Policy 8M-6: Excluding MRLs designated prior to January 1, 2020, surface mining should not be within residential zones or subdivisions platted at urban densities. When

lands subject to mining permits abut residential zones or subdivisions platted at urban densities, project specific mitigation to limit potential impacts to residential zones or subdivisions platted at urban densities is required.

Policy 8M-7 Excluding MRLs designated prior to January 1, 2020, surface mining should not enclose upon adjacent parcels that do not have active surface mining permits by greater than 50% of the enclosed parcel's perimeter, unless project specific mitigation can be achieved.

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5. All pre-existing legal permitted sites meeting the above criteria will be designated.
6. The site shall have a proven resource that meets the following criteria:
 - construction material must meet current WSDOT Standard Specifications for common borrow criteria for road, bridge and municipal construction, or Whatcom County standards for other uses.
 - Sand and gravel deposits must have a net to gross ratio greater than ~~80~~50% (1280 cy/acre/foot).
- ~~7. MRL Designations must not be within nor abut developed residential zones or subdivisions platted at urban densities.~~
- ~~8. MRL Designations must not occur within the 10-year zone of contribution for designated wellhead protection areas, as approved by the State Department of Health for Group A systems, and by the Whatcom County Health Department for Group B systems, in accordance with source control provisions of the regulations on water system comprehensive planning. MRL designations may be modified if a wellhead protection area delineated subsequent to MRL designation encompasses areas within the designated MRL. If a fixed radii method is used to delineate a wellhead protection area, the applicant may elect to more precisely delineate the wellhead protection boundary using an analytical model; provided, that the delineated boundary proposed by the applicant is prepared by a professional hydrogeologist; and further provided, that the delineated boundary has been reviewed and approved by the Washington State Department of Health for Group A systems, and by the Whatcom County Health Department for Group B systems. The hydrogeologist shall be selected by mutual agreement of the county, water purveyor, and applicant; provided, if agreement cannot be reached the applicant shall select a consultant from a list of no less than three qualified consultants supplied by the county and water purveyor.~~
- ~~9. MRL Designation should not enclose by more than 50% non-designated parcels.~~
10. Site-specific MRL designations shall only be approved after mineral extraction impacts have been anticipated and evaluated, and potential adverse environmental impacts have been addressed through appropriate mitigation and/or reasonable alternatives.

11. MRL Designations must be reviewed for internal consistency with other parts of the comprehensive plan so that MRL designation does not preclude achievement of other parts of the comprehensive plan.
12. Expansion of MRL Designations to parcels contiguous to, and held by more than 1% common beneficial ownership or beneficial interest with an existing mine is allowed, but before extraction of the additional area may commence the existing mine must be in complete compliance with all operating permits and regulations.

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13. Abutting parcel size density must not exceed one unit per nominal five acres for more than 25% of the perimeter of the site unless project specific mitigation is created.

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Metallic and Industrial Mineral Deposits

18. For metallic and rare minerals, mineral designation status extends to all patented mining claims.
19. Mineral Resource Designation status extends to all currently permitted industrial mineral deposits of long-term commercial significance.
20. All other non-patented mineral deposits must meet the non-metallic MRL Designation criteria, numbers 6 through 12, as applicable.

Mineral Resources – Site Selection Method

1. Pre-existing MRL Designations

~~1-2. Sites identified as potential resource areas in the Report Engineering Geology Evaluation Aggregate Resource Inventory Study Whatcom County, Washington (GeoEngineers, Inc., Sept. 30, 2003) and updated in the Aggregate Resource Inventory 2014 Study Update Whatcom County, Washington (Element Solutions, December 22, 2014). Sites meeting Mineral Resources Designation Criteria 1-5 (and areas enclosed by these sites greater than 50%.~~

~~2-3. Sites requested by owner or operator meeting designation criteria.~~

~~3. Sites that are regionally significant meeting designation criteria.~~

~~4. Sites adjacent to both roads and other proposed MRL sites meeting designation criteria.~~

Exhibit C - SMAC recommended Zoning Code amendments

Chapter 20.73

MINERAL RESOURCE LANDS SPECIAL DISTRICT (MRL)

Sections:

- 20.73.010 Purpose.
- 20.73.020 Application.
- 20.73.050 Permitted uses.
- 20.73.100 Accessory uses.
- 20.73.130 Administrative approval uses.
- 20.73.150 Conditional uses.
- 20.73.200 Prohibited uses.
- 20.73.250 Minimum lot size.
- 20.73.650 Development criteria.
- 20.73.651 Road access.
- 20.73.652 Repealed.
- 20.73.700 Performance standards.
- 20.73.701 Noise.
- 20.73.702 Surface mining operations within critical aquifer recharge areas.
- 20.73.703 Public safety.

20.73.010 Purpose.

The primary purpose of this district is to implement the mineral resource lands designation of the Comprehensive Plan, established pursuant to RCW [36.70A.170](#), by allowing the type of activity that encourages and supports the opportunity for the extraction of minerals in areas of Whatcom County designated as containing resources viable for long-term commercial extraction; further protect open space resources within Whatcom County. This district is also designed to discourage incompatible uses from locating upon mineral resource lands where the extraction of minerals occurs or can be anticipated. (Ord. 2005-079 § 1, 2005; Ord. 97-069, 1997; Ord. 92-029, 1992).

20.73.130 Administrative approval uses.

The following uses are permitted subject to administrative approval pursuant to WCC [20.84.235](#):

.131 All administrative approval uses in the underlying zone districts shall remain administrative approval uses unless expressly prohibited or made conditional, or further conditioned by this chapter.

20.73.150 Conditional uses.

.153 Surface mining subject to Washington State's Surface Mining Act (Chapter [78.44](#) RCW); provided, that:

(2) At minimum, the activity adheres to the development and performance standards of WCC [20.73.650](#) and [20.73.700](#). In addition, no excavation shall occur within the five-year zone of contribution for designated wellhead protection areas. Excavations may occur within the 10-year zone of contribution outside of the five-year zone of contribution if they are not within 10 vertical feet of the seasonal high water table; provided that, excluding MRLs designated prior to January 1, 2020, surface mining subject to the Surface Mining Act shall be prohibited within the 10-year travel time zone of wellhead protection areas, as approved by the State Department of Health for Group A systems and by the Whatcom County Health Department for Group B systems. If a fixed radii method is used to delineate a wellhead protection area, the surface mining applicant may elect to more precisely delineate the wellhead protection boundary using an analytical model; provided, that the delineated boundary proposed by the surface mining applicant is prepared by a professional hydrogeologist; and further provided, that the delineated boundary has been reviewed and approved by the Washington State Department of Health. The hydrogeologist shall be selected by mutual agreement of the county, water purveyor, and applicant; provided, if agreement cannot be reached the applicant shall select a consultant from a list of no less than three qualified consultants supplied by the county and water purveyor.

(9) When mineral extraction is proposed within 500 feet of a gas or petroleum transmission pipeline, a site specific geotechnical analysis of potential impacts to the pipeline is required. The analysis shall show that mining will not result in an increased likelihood of the pipeline becoming exposed or rupturing during an earthquake, and shall consider various seismic scenarios with a 2 percent probability of exceedance in 50 years on both proximal crustal faults and at the Cascadia Subduction Zone.

(10) Mining permits should not be within residential zones or subdivisions platted at urban densities. Mining permits abutting residential zones or subdivisions platted at urban densities shall have project specific mitigation. This criterion shall not apply within MRLs designated prior to January 1, 2020.

(11) When the underlying zoning district is Agriculture (AG), or when the subject parcel is within an area identified by the Rural Land Study Update where

agricultural land protection efforts should be strengthened, mining and subsequent reclamation shall occur consistent with Washington State Department of Natural Resources "Best Management Practices for Reclaiming Surface Mines in Washington and Oregon", Revised Edition December 1997, or as revised. This criterion shall not apply within MRLs designated prior to January 1, 2020.

20.73.250 Minimum lot size.

The provisions in this section apply to all designated Mineral Resource Lands (MRL) with a MRL zoning overlay. Divisions of land, exempt land divisions, and boundary line adjustments resulting in parcels of 20 acres or larger are exempt from the cluster subdivision requirements.

.251 All divisions of land, boundary line adjustments or exempt land divisions in the Mineral Resource Lands Special District shall be approved in accordance with the local and state subdivision laws. ~~No division which creates any parcel of less area than 20 acres, less roads, shall be permitted except when the underlying zone is agricultural or Commercial Forestry; then it shall be 40 acres, less roads~~ (Ord. 97-069, 1997; Ord. 92-079, 1992; Ord. 92-029, 1992), provided that:

(1) Parcels that are wholly within the 10 year zone of contribution for designated wellhead protection areas, as approved by the State Department of Health for Group A systems, and by Whatcom County Health Department for Group B systems, may subdivide consistent with the maximum density and minimum lot size provisions of the underlying zone.

(2) Parcels that are not wholly within the 10 year zone of contribution for designated wellhead protection areas, as approved by the State Department of Health for Group A systems, and by Whatcom County Health Department for Group B systems, shall subdivide consistent with the maximum density and development and use standards outlined below.

.252 Maximum density shall be the same as in the underlying zone district.

.253 Development and use standards

Subdivisions or segregations shall be clustered. Development on all parcels subject to this section shall follow the requirements below:

(1) The clustered residential lot(s) shall not exceed 25 percent of the gross acreage of the original parent parcel, regardless of the number of separate subdivision events; and

(2) Shall not interfere with the resource productivity and mineral resource use of the mineral resource reserve tract; and

(3) If the parent parcel contains an area that is of lower mineral resource quality or where mineral extraction would be more difficult, and if this area is large enough to contain or partially contain the clustered residential lots, then the clustered residential lots shall be located on this lower quality resource or area where mineral extraction would be more difficult, unless restricted by physical constraints or unless the placement of said lots would be contrary to subsection (2) of this section; and

(4) Minimum lot size shall comply with the underlying zoning districts lot clustering provisions, unless a larger lot is required as determined by the requirements of the Bellingham-Whatcom County Sanitary Code for on-site septic disposal; provided, however, separate drainfield tracts and common drainfields shall be allowed consistent with the sanitary code. Drainfields serving the cluster development may be located within the required building setback, but not within the reserve tract; and

(5) In order to preserve rural character, no more than 16 residential lots shall be permitted in one cluster and there shall be at least 500 feet of separation between any new clusters; and

(6) All wells for potable water within the cluster subdivision shall be kept a minimum of 100 feet from the property line of an existing mineral resource extraction operation or any parcel or portion thereof which is designated as the mineral resource reserve tract; and

(7) The 25 percent of a parcel available for development may be contiguous or in separate clusters so long as the requirements of this section are met; and

(8) At the time of the initial development of a parcel under this section the entire parcel shall be included within the plat or tract map recorded, including the clustered residential parcel or parcels, and the reserve tract. Modifications to the plat or tract map shall be made in accordance with state law and county codes and ordinances, and shall be permitted, so long as the provisions of this section are met as applied to the original parcel; and

(9) A statement that the property is subject to the mineral resource land subdivision standards (WCC 20.73.250) shall be recorded on the face of the tract map, or short plat; and

(10) For purpose of determining additional development density should a rezone take place, the original (pre-subdivided) parent parcel acreage must be included in the total acreage calculation and the original development density shall be subtracted from the increased total development density, assigned to the original parent parcel, to obtain remaining density.

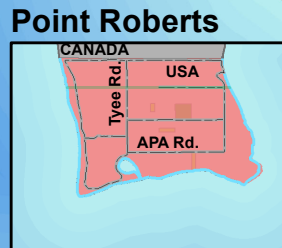
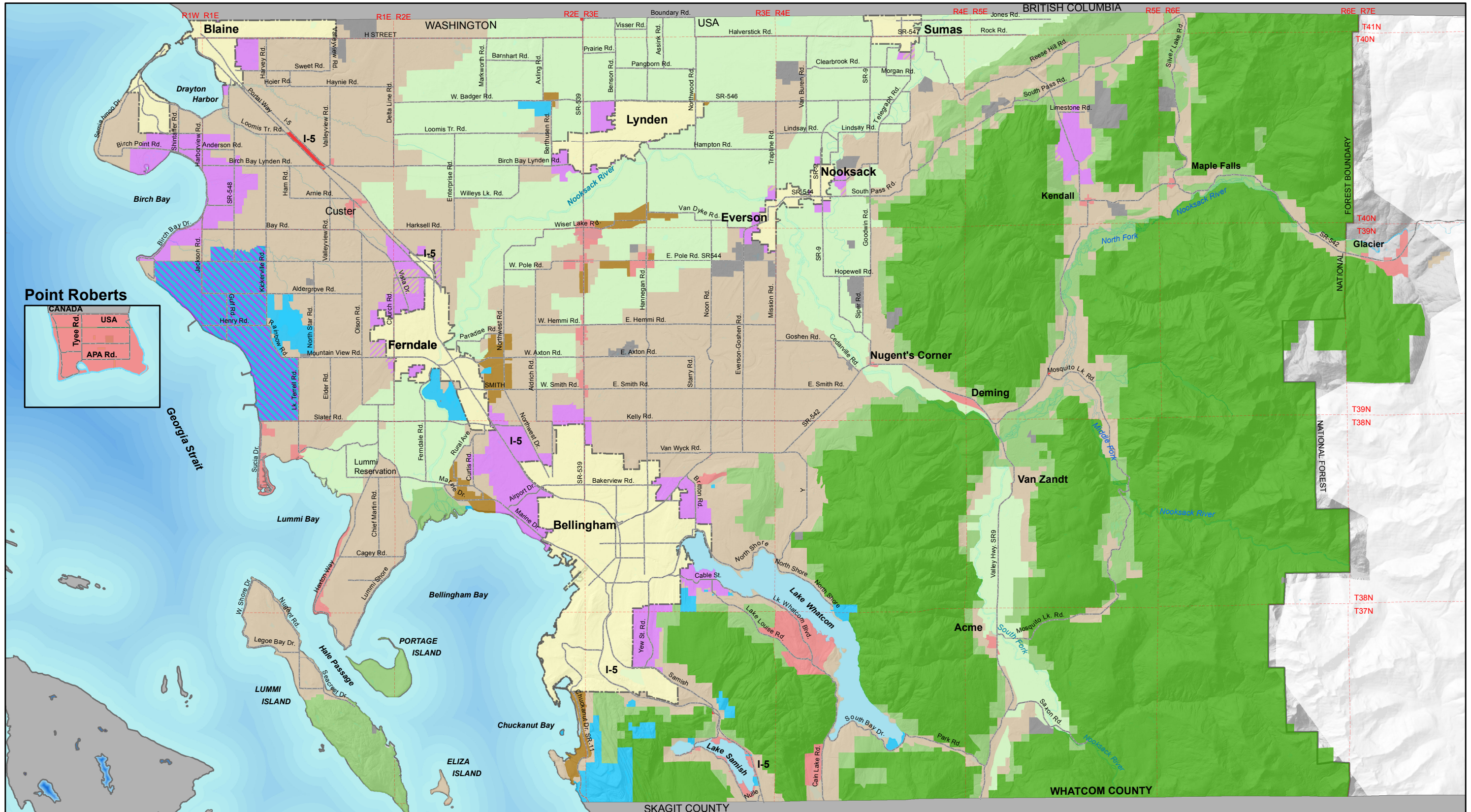
Chapter 20.42
RURAL FORESTRY (RF) DISTRICT

~~.058~~ Surface mining, rock crushing, washing and sorting subject to the Forest Practices Act (Chapter 76.09 RCW); ~~provided, that a conditional use permit is required for accessory rock crushing activities located within 2,000 feet from a rural or residential district.~~

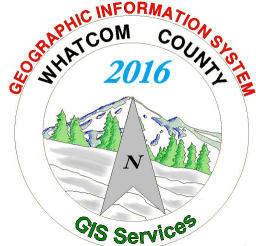
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Figure 1 - Existing MRL designations on the Comprehensive Plan Land Use Map



- | | | | | | | | |
|---|---------------------------|---|--------------------|---|------------------------|---|-------------------|
|  | Incorporated City |  | Rural |  | Agriculture |  | Public Recreation |
|  | Urban Growth Area |  | Rural Neighborhood |  | Rural Forestry | | |
|  | Urban Growth Area Reserve |  | Rural Community |  | Commercial Forestry | | |
|  | Major/Port Industrial UGA |  | Rural Business |  | Mineral Resource Lands | | |

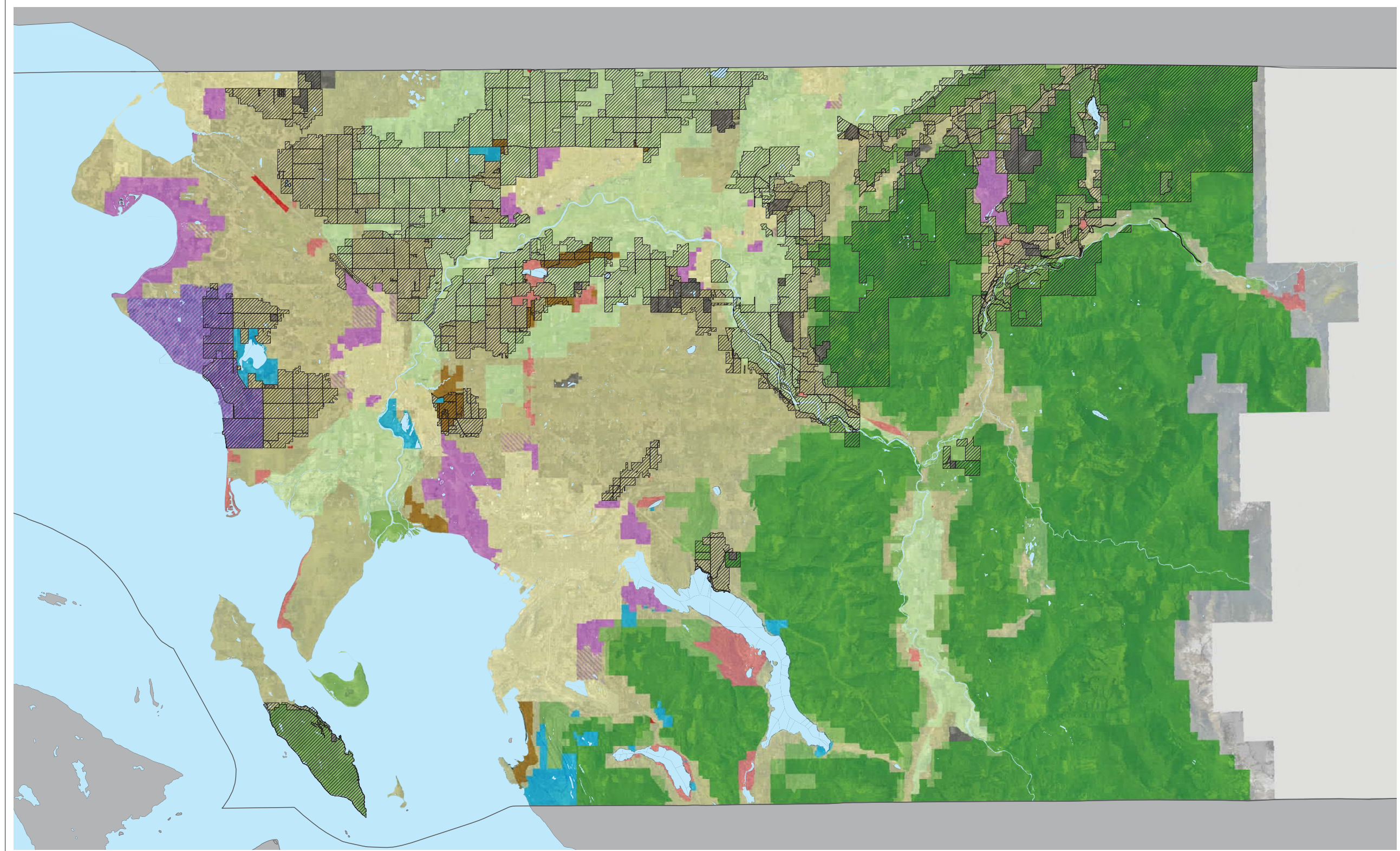


Source:
-Whatcom County PDS 2015 (base)

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














0 0.75 1.5 3 4.5 6 Miles

Figure 2 - SMAC recommended Designated Mineral Resource Lands Map



Surface Mining Advisory Committee Recommendation for Designated Mineral Resource Lands

Comprehensive Plan Designations

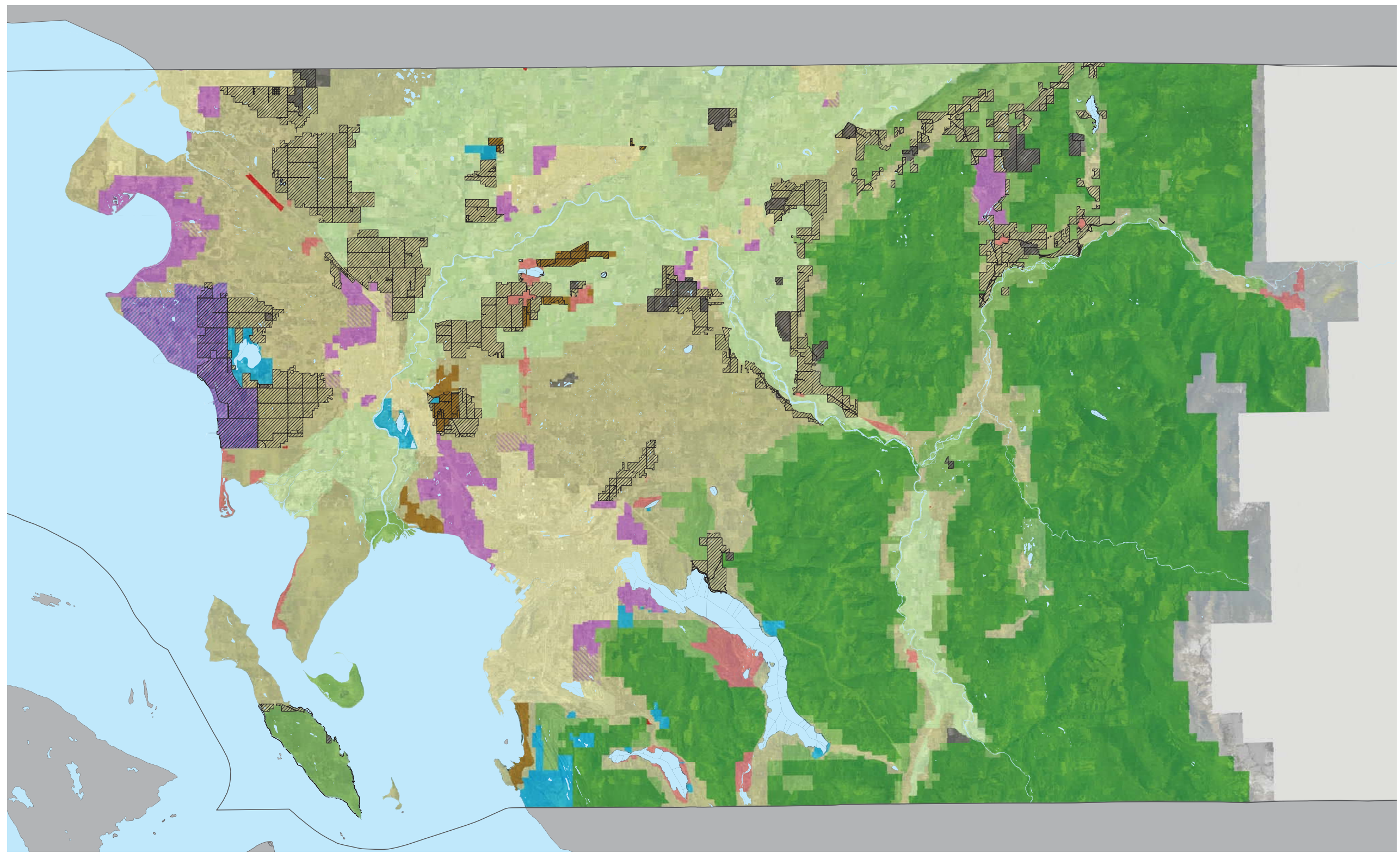
	Incorporated City Limits		Rural		Rural Forestry
	Federal		Rural Neighborhood		Commercial Forestr
	Urban Growth Area		Rural Community		Mineral Resource Lands (MRL)
	Urban Growth Area Reserve		Rural Business		Public Recreation
	Major/Port Industrial UGA		Agriculture		SMAC Recommendation



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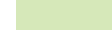
Figure 3 - No Resource Lands - SMAC recommendation minus AG, CF, RF








**NO RESOURCE LANDS
Surface Mining Advisory
Committee Recommendation
Minus Designated Agriculture,
Commercial Forestry, and
Rural Forestry Lands**

Comprehensive Plan Designations

-  Incorporated City Limits
-  Federal
-  Urban Growth Area
-  Urban Growth Area Reserve
-  Major/Port Industrial UGA

-  Rural
-  Rural Neighborhood
-  Rural Community
-  Rural Business
-  Agriculture

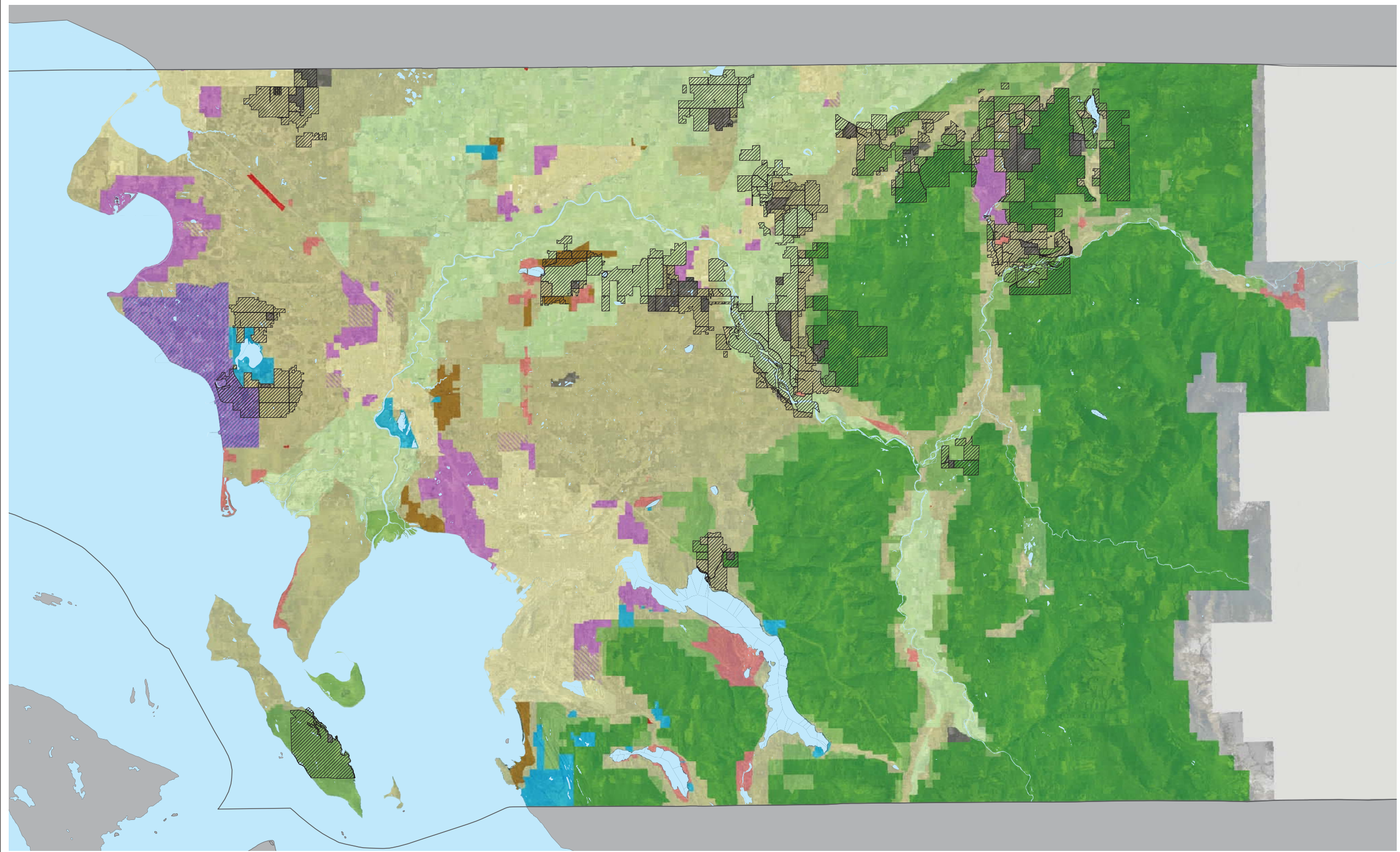
-  Rural Forestry
-  Commercial Forestr
-  Mineral Resource Lands (MRL)
-  Public Recreation
-  SMAC Recommendation - No AG, CF, RF



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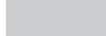









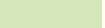



Figure 4 - Localized Expansion - SMAC recommendation within 1 mile of existing MRL



**LOCALIZED EXPANSION
Surface Mining Advisory
Committee Recommendation
Within 1 mile of Existing
Mineral Resource Lands**

Comprehensive Plan Designations

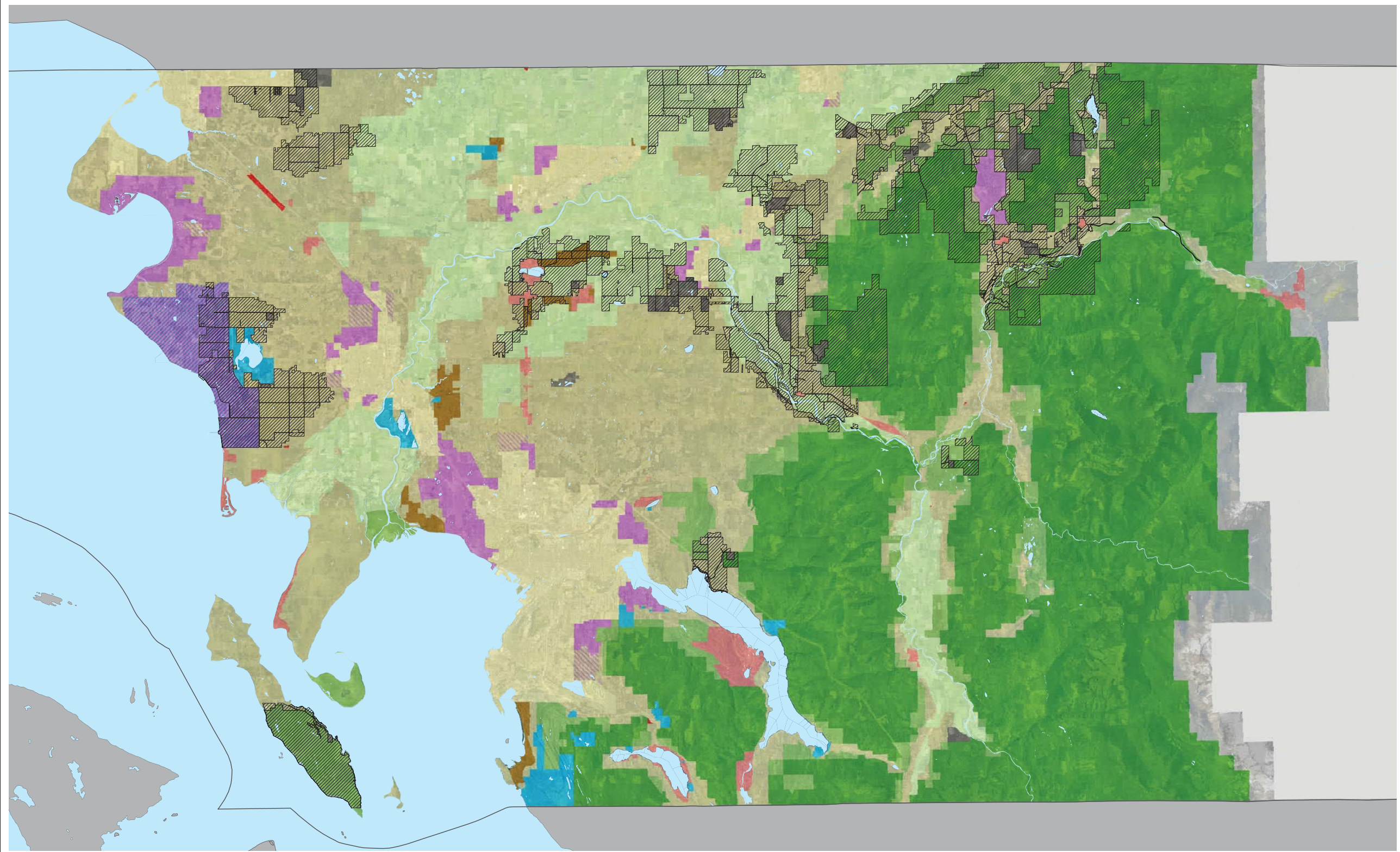
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	Federal		Rural Neighborhood		Commercial Forestr
	Urban Growth Area		Rural Community		Mineral Resource Lands (MRL)
	Urban Growth Area Reserve		Rural Business		Public Recreation
	Major/Port Industrial UGA		Agriculture		SMAC Recommendation 1-Mile



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



Figure 5 - Localized Expansion - SMAC recommendation within 2 miles of existing MRL



**LOCALIZED EXPANSION
Surface Mining Advisory
Committee Recommendation
Within 2 miles of Existing
Mineral Resource Lands**

Comprehensive Plan Designations

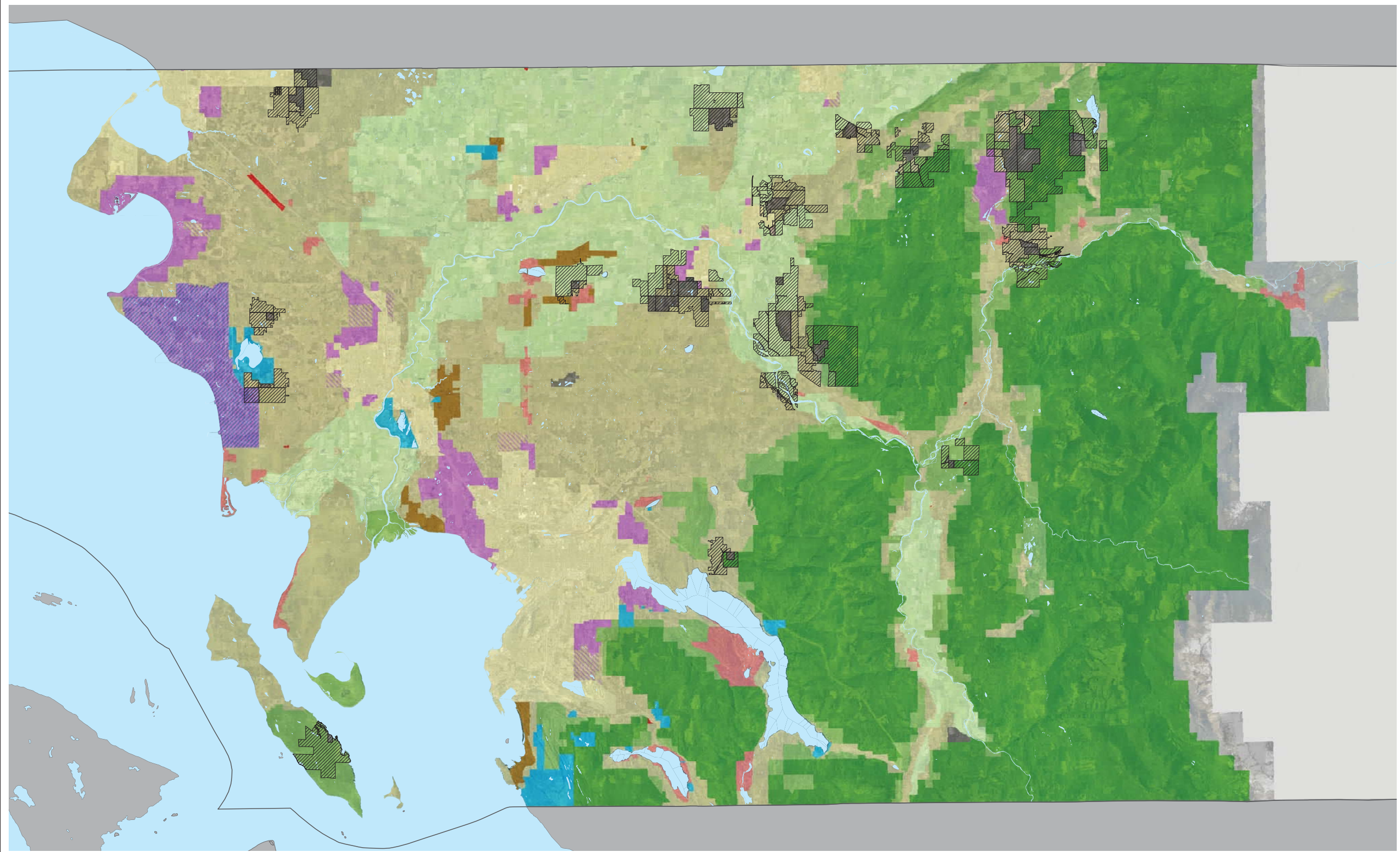
 Incorporated City Limits	 Rural	 Rural Forestry
 Federal	 Rural Neighborhood	 Commercial Forestr
 Urban Growth Area	 Rural Community	 Mineral Resource Lands (MRL)
 Urban Growth Area Reserve	 Rural Business	 Public Recreation
 Major/Port Industrial UGA	 Agriculture	 SMAC Recommendation 2-Mile



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



Figure 6 - Localized Expansion - SMAC recommendation within 1/2 mile of existing MRL



**Localized Expansion
Surface Mining Advisory
Committee Recommendation
Within 1/2 Mile of Existing
Mineral Resource Lands**

Comprehensive Plan Designations

 Incorporated City Limits	 Rural	 Rural Forestry
 Federal	 Rural Neighborhood	 Commercial Forestr
 Urban Growth Area	 Rural Community	 Mineral Resource Lands (MRL)
 Urban Growth Area Reserve	 Rural Business	 Public Recreation
 Major/Port Industrial UGA	 Agriculture	 SMAC Recommendation 1/2 Mile



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Table 1 - Approximate CP Designation Acreage presently vs SMAC recommendation

CP Designation	Current	SMAC Recommendation	After
AG	85,821	-36,799	49,022
CF	186,474	-32,548	153,926
CITY	35,282	0	35,282
FEDERAL	857,352	0	857,352
MAJ/PORT-IND-UGA	7,029	-3,494	3,535
MRL	4,133	+118,860	122,993
PUBLIC-REC	4,812	0	4,812
RF	35,383	-14,460	20,923
RURAL	121,175	-30,180	90,995
RURAL BUSINESS	194	0	194
RURAL COMMUNITY	8,861	0	8861
RURAL NEIGHBORHOOD	3,072	-1,283	1,789
SMALL TOWN	211	0	211
UGA	12,713	0	12,713
UGAR	1,947	0	1947
MISC (WATER)	96	-96	0

Table 2 - CP Designation Acreage presently vs SMAC recommendation Minus AG, CF, RF

CP Designation	Current	SMAC Recommendation	After
AG	85,821	0	85,821
CF	186,474	0	186,474
CITY	35,282	0	35,282
FEDERAL	857,352	0	857,352
MAJ/PORT-IND-UGA	7,029	-3,494	3,535
MRL	4,133	+35,053	39,186
PUBLIC-REC	4,812	0	4,812
RF	35,383	0	35,383
RURAL	121,175	-30,180	90,995
RURAL BUSINESS	194	0	194
RURAL COMMUNITY	8,861	0	8861
RURAL NEIGHBORHOOD	3,072	-1,283	1,789
SMALL TOWN	211	0	211
UGA	12,713	0	12,713
UGAR	1,947	0	1947
MISC (WATER)	96	-96	0

Table 3 - CP Designation Acreage presently vs SMAC recommendation within 1 mile existing MRL

CP Designation	Current	SMAC Recommendation within 1 Mile of existing MRL	After
AG	85,821	-9,895	75,926
CF	186,474	-10,752	175,722
CITY	35,282	0	35,282
FEDERAL	857,352	0	857,352
MAJ/PORT-IND-UGA	7,029	-816	6,213
MRL	4,133	+41,729	45,862
PUBLIC-REC	4,812	0	4,812
RF	35,383	-7,342	28,041
RURAL	121,175	-12,397	108,778
RURAL BUSINESS	194	0	194
RURAL COMMUNITY	8,861	0	8861
RURAL NEIGHBORHOOD	3,072	-475	2,597
SMALL TOWN	211	0	211
UGA	12,713	0	12,713
UGAR	1,947	0	1947
MISC (WATER)	52	-52	0

Table 4 - CP Designation Acreage presently vs SMAC recommendation within 2 mile existing MRL

CP Designation	Current	SMAC Recommendation within 2 miles of existing MRL	After
AG	85,821	-15,431	70,390
CF	186,474	-19,588	166,886
CITY	35,282	0	35,282
FEDERAL	857,352	0	857,352
MAJ/PORT-IND-UGA	7,029	-3,454	3,575
MRL	4,133	+72,956	77,089
PUBLIC-REC	4,812	0	4,812
RF	35,383	-13,909	21,474
RURAL	121,175	-19,799	101,376
RURAL BUSINESS	194	0	194
RURAL COMMUNITY	8,861	0	8861
RURAL NEIGHBORHOOD	3,072	-699	2,373
SMALL TOWN	211	0	211
UGA	12,713	0	12,713
UGAR	1,947	0	1947
MISC (WATER)	76	-76	0

Table 5 - CP Designation Acreage presently vs SMAC recommendation within 1/2 mile existing MRL

CP Designation	Current	SMAC Recommendation within 1/2 mile of existing MRL	After
AG	85,821	-4,785	81,036
CF	186,474	-5,301	181,173
CITY	35,282	0	35,282
FEDERAL	857,352	0	857,352
MAJ/PORT-IND-UGA	7,029	-155	6,874
MRL	4,133	+21,087	25,220
PUBLIC-REC	4,812	0	4,812
RF	35,383	-3,919	31,464
RURAL	121,175	-6,893	114,282
RURAL BUSINESS	194	0	194
RURAL COMMUNITY	8,861	0	8861
RURAL NEIGHBORHOOD	3,072	-31	3,041
SMALL TOWN	211	0	211
UGA	12,713	0	12,713
UGAR	1,947	0	1947
MISC (WATER)	3	-3	0

Table 6 - DP Designation Acreage now vs SMAC recommendation in RSAs

	Acreage of Parcels intersecting PRA/RSA	Avg Parcel Size	# Parcels Impacted – MRPO (Subdivision would require clustering)	# Parcels impacted – MRL Overlay (Subdivision requires 20 acre minimum)	# Parcels not impacted (Cannot presently subdivide further or have no minimum lot size)
Harksell	~2,907.7	~5.8 Acres	61 Parcels - 263 Clustered lots	61 -54 cannot subdivide, potentially eliminating 186 lots. -7 can subdivide into 16 lots, which is less than the 77 presently allowed, potentially eliminating 61 lots.	442 of 503
Lawrence	~501.6 acres	~6.9 Acres	13 Parcels - 58 Clustered lots	13 -10 cannot subdivide, potentially eliminating 29 lots. -3 can subdivide into 7 lots, which is less than the 29 presently allowed, potentially eliminating 22 lots.	60 of 73
Loomis Trail	~2,884.0 acres	~7.0 acres	65 Parcels - 290 Clustered Lots	65 -57 cannot subdivide, potentially eliminating 205 lots. -8 can subdivide into 18 lots, which is less than the 85 presently allowed, potentially eliminating 67 lots.	348 of 413

Guide/Aldrich	~3,055.3 acres	~6.9 Acres	48 Parcels - 152 Clustered Lots	48 -43 cannot subdivide, potentially eliminating 115 lots. -5 can subdivide into 15 lots, which is less than the 37 presently allowed, potentially eliminating 22 lots.	398 of 446
East Badger	~331.5 acres	19.5 Acres	1 Parcel - 3 Clustered Lot	1 cannot subdivide, potentially eliminating 3 lots.	16 of 17
Ten Mile	~257.9 acres	10.7 Acres	7 Parcels - 26 Clustered Lots	7 cannot subdivide, potentially eliminating 26 lots.	17 of 24
Reese Hill Rd	~145.8 acres	~29.2 acres	5 Parcels - 20 Clustered Lots	5 -3 cannot subdivide, potentially eliminating 8 lots. -2 can subdivide into 4 lots, which is less than the 12 presently allowed, potentially eliminating 8 lots.	0 of 5
Leibrant	~95.5 acres	~11.9 acres	3 Parcels - 12 Clustered Lots	3 -2 cannot subdivide, potentially eliminating 4 lots. -1 can subdivide into 2 lots, which is less than the 8 presently allowed, potentially eliminating 6 lots.	5 of 8
Lake Terrell	~551.5 acres	~25.1 acres	13 Parcels - 97 Clustered Lots	13 -9 cannot subdivide, potentially eliminating 44 lots.	9 of 22

				-4 can subdivide into 11 lots, which is less than the 53 presently allowed, potentially eliminating 42 lots.	
Jackman Rd	~54.0 acres	~6.7 acres	1 Parcel - 3 Clustered Lots parcels	1 cannot subdivide, potentially eliminating 3 lots.	7 of 8
Guide/Pole	~25.5 acres	~25.5 acres	1 Parcel - 5 Clustered Lots	1 cannot subdivide, potentially eliminating 5 lots.	0 of 1
Ferndale	~251.6 acres	~19.4 acres	10 Parcels - 43 Clustered Lots	10 -9 cannot subdivide, potentially eliminating 34 lots. -1 can subdivide into 2 lots, which is less than the 9 presently allowed, potentially eliminating 7 lots.	3 of 13
Elder Rd	~42.4 acres	~42.4 acres	1 Parcel - 8 Clustered Lots	1 can subdivide into 2 lots, which is less than the 8 presently allowed, potentially eliminating 6 lots.	0 of 1
Eastwood Rd	~375.2 acres	~12.5 acres	7 Parcels - 21 Clustered Lots	7 cannot subdivide, potentially eliminating 21 lots.	23 of 30
Deming	~134.3 acres	~7.1 acres	4 Parcels - 14 Clustered Lots	4 cannot subdivide, potentially eliminating 14 lots.	15 of 19
Birch Bay/Lynden	~261.3 acres	~7.1 acres	8 Parcels - 24 Clustered Lots	8 cannot subdivide, potentially eliminating 24 lots.	29 of 37
Miniker	~110.9 acres	~55.4 acres	2 Parcels - 10 Clustered Lots	2 -1 cannot subdivide, potentially eliminating 2 lots.	0 of 2

				-1 can subdivide into 4 lots, which is less than the 8 presently allowed, potentially eliminating 4 lots.	
Grandview	~42.5 acres	~14.2 acres	2 Parcels - 7 Clustered Lots	2 cannot subdivide, potentially eliminating 7 lots.	1 of 3
Custer	~128.8 acres	~64.4 acres	2 Parcel - 12 Clustered Lots	2 can subdivide into 4 lots, which is less than the 12 presently allowed, potentially eliminating 8 lots.	0 of 2
Total RSA/PRA	~12,157.3 acres	~7.5 Acres	254 Parcels - 1,068 Clustered Lots	254 -219 cannot subdivide, potentially eliminating 730 lots. -35 can subdivide into 85 lots, which is less than the 338 presently allowed, potentially eliminating 253 lots.	1,373 of 1,627