

City of Olympia Planning Commission Members and Jennifer:

Thank you again for the time you have put into the Urban Agriculture Code Amendments. I wanted to send you a copy of the photos I passed out at the Monday night public hearing and give further detail to my oral statements.

First on the issue of Animals:

Section C.1.a. states: "Quantity. No more than a total of three traditional pets, such as dogs and cats, four months of age or older, shall be permitted per dwelling unit. Song birds or other traditional pet birds (e.g. parrots) are permitted. The keeping of racing and performing pigeons is permitted as a Conditional Use. (Traditional pets are defined as a species of animals which can be house-broken, or walked on a leash, or are frequently, but not necessarily, housed within a residence and are neither obnoxious nor a public safety or health threat.)"

While I understand that this is standard language, 'traditional' has changed substantially. Many people now have rabbits or pot bellied pigs as pets, though non-traditional they can be house-broken and walked on a leash. Those same species would fall under the livestock descriptions as well. There may need to be some text added that clarifies that certain species may be under multiple provisions in this code and it is up to the resident to designate whether they are pets or livestock.

Section C.1.b. regarding Fowl:

While I am encouraged that Olympia is willing to look at increasing the number of Fowl allowed I would like to encourage language which is more consistent with other local jurisdictions and the needs of the animals. For instance the City of Lacey code 16.21.014 A.1.b.1.a reads " the maximum number of all fowl permitted accessory to a single family residential home on an urban lot [less than 1 acre] shall be 1 per 1000 square feet of lot area, up to a maximum of 10." This ratio of one bird per 1000 square feet of space is also consistent with your "one female chicken for every additional one thousand square feet of lot area beyond one acre". Lot space in neighborhoods off Hoffman Road for example (near Wiggins road where I farm) range on average from 6500 sq feet to 9200 sq feet. At one bird per 1000 square feet that is still staying under the 10 bird maximum and providing plenty of space. Allowing up to 10 birds under an acre also encourages growth of cottage industries.

I am concerned with the vague language in part iii. which simply states "Chickens shall be confined". I strongly urge clarification of this piece. The following section (iv.) references enclosures as 'coops' and discusses the setbacks from the property lines. Chickens need a coop for egg laying and protection at night; they need other space for daily activity. The language in both these areas could use some specifics or examples. For instance if the yard is fenced do the chickens need a separate partitioned area or fenced yard within that, or is the properties perimeter fence sufficient enclosure? If you are requiring a separate fenced area does that whole area have to be set back from the property line, or just the actual coop structure? I would also encourage a reduction in the setbacks to a maximum of 10 feet in the front yard.

I did not see anything in the new code regarding the ability of owners to process their chickens for their own use on their property without penalty and feel strongly that this needs to be addressed. As small livestock come into the urban area government and neighbors must realize that it is not cost effective, or feasible in many cases, for owners to take their livestock elsewhere to be processed.

#### Section C.1.b. regarding Rabbits:

First I feel background on rabbit raising would be helpful. First, female rabbits are does, males are bucks and young rabbits are kits or juniors. Rabbits are born hairless, deaf, with eyes closed and do not leave the nest box until they are two to three weeks old; they are generally weaned (removed from doe) between 6 and 8 weeks old.

The American Rabbit Breeders Association (ARBA) Official Guide book Raising Better Rabbits & Cavies is the rabbit standard for breeds, shows etc. They set the breed standards and encourage good husbandry practices. ARBA groups rabbits into three sizes for housing needs: "less than six pounds mature body weight can be kept satisfactorily in cages that are 18 inches deep, 24 inches wide and 12 inches high. Those animals that are over six pounds mature weight and under eleven pounds mature weight can be housed in cages that are 24 inches deep, 26-36 inches wide and 18 inches high. The giant rabbits, those above twelve pounds mature weight, should be kept on solid floors that are 24 inches deep, 36-48 inches long, and 18 inches high." (pg78) Please note that rabbits are generally (especially if being raised as livestock) kept continually in their cages. On page 171 of the ARBA guide they reference commercial rabbitries being able to house 500 rabbits in a 36x214 foot building. Now while I agree on a small scale that is quite excessive the point is to look at acceptable space requirements; 36 x 214 is 7704 sq feet which works out to about 15 feet per rabbit, including walkways etc.

The question is often asked 'What is considered an adult rabbit?' that is actually a difficult question to answer! For showing purposes rabbits are considered Juniors until they are six months old, but they may not reach their adult weight until they are eight months or more. The ARBA standard for showing 'market animals' is no more than ten weeks old and 5 pounds; this is a very narrow requirement and a difficult goal to achieve. Most breeders and processors will take rabbits anywhere from 3.5 – 6 pounds under 12 weeks old.

General practice for people raising rabbits only for their own use is one buck and three does; two bucks and three to five does is encourage if you are breeding for show stock or to sell breeding animals. It is important in those cases to have genetic variety.

With all of that being said there are a few changes to section e of your code that I would encourage to be changed. First because of the spacing needs for rabbits; even your own code lists each rabbit needing a minimum of 3.5 square feet; there is really no need for the 1000 square feet per rabbit requirement. A maximum of 24 rabbits such as the City of Lacey allows gives residents many options without overloading the space of even small lots. I would encourage further definition of rabbits allowed to not include juniors under 4 months old, this allows those who are raising for meat or show time to get their animals up to a good size and either rehomed or processed. Again the setbacks for the enclosures being 20 feet from property lines can be prohibitive, I would encourage no more than a 10 foot set back. The section on rabbits should also be separate from any other livestock or pets since their needs are very different. I did not see anything in the new code regarding the ability of owners to process their rabbits for their own use on their property without penalty and feel strongly that this needs to be addressed. As small livestock come into the urban area

government and neighbors must realize that it is not cost effective or feasible in many cases for owners to take their livestock elsewhere to be processed.

I have attached multiple examples below of my own set up showing the space requirements and samples of other rabbitries as well.

On the issue of Farm Stands, chapter 18.02.180 & chapter 5.24:

I am please that Olympia is removing Agricultural sale from the same restrictions as garage sales. I am a bit concerned that the only language is that garage sales 'exclude agricultural sales' . . . is there language elsewhere that defines what is allowed for agricultural sales? If not I would encourage this language to be added.

Thank you again for your time and consideration. Feel free to contact me at any time if you have further questions or concerns.

Celeste M Wade, Crosstown Farms and Rabbitry



Portable Yard run. 4 ft by 10 ft. 40 sq feet

We have two of these runs that we use for conjugal visits; play time for the bucks; general outside time as needed; temp housing when cleaning cages or colony spaces. Also used for mobile housing on processing days or when showing sale animals.



French Lop Colony – 8 ft x 8 ft – 64 sq feet

Currently 2 adult French Lop Does (12+ pounds each) and 9 six week old kits

The cage above is 2ft x 4ft and is used for housing male kits between 8 & 12 weeks old. Males are not kept past 12 weeks.



**Adult Doe Colony & housing.**

8 ft by 12 ft. 96 sq feet of floor space

Does in this Colony are between 8 & 11 pounds; kits will be born and raised here or introduced once they are eating solid foods and of good size (generally 3-6 weeks)

There are also 3 cages that are 2ft x 3 ft for does that need to be separated.

There are lots of cubbies and boxes for them to get in or on and that gives them even more space beyond that 96 sq feet.

Kits raised here stay until they are sold or of size to process, generally about 8-10 weeks old. Any males over 8 weeks are removed to temporary housing until they are processed.





Rabbitry. 10 ft by 16 ft.

This building has 6 cages that are 2ft x 3 ft and one that is 2ft x 4ft

There is also room for storage of supplies (feed, travel cages etc) and table space for care and inspection of rabbits.

Each cage generally holds one adult male buck, as they are more territorial animals.

The picture below shows one cage being used to house 3 young bucks that are waiting for processing. 3-4 buck to a cage at this size for no more than 2 weeks (grow-out pen) is typical.





Examples of other rabbitry setups showing tradition cages, hanging or stacking cages and colony spaces.

All pictures were found on public domains, rabbitry names withheld for privacy only.

