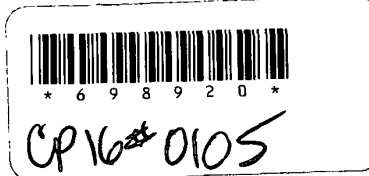


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ALL COMMISSIONERS

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May 12, 2014

Clark County Board of Commissioners  
P.O Box 5000  
Vancouver, Washington 98666



MAY 15 2014

Board of Commissioners

**Re: Commercial Resource Lands and the GMA**

Clark County Citizens United, Inc. represents approximately 6,000 members and supporters from the rural lands and unincorporated areas of Clark County. CCCU, Inc. is concerned over Clark County's designations and zoning for agriculture and forest lands in their current Comprehensive Land Use Plan. The following is information for the record, over what CCCU, Inc. has discovered.

***RCW 36.70A.030 Definitions. Unless the context clearly requires otherwise, the definitions in this section apply throughout this chapter.***

***(2) "Agricultural land" means land primarily devoted to the commercial production of horticultural, viticultural, floricultural, dairy, apiary, vegetable, or animal products of berries, grain, hay straw turf, seed.....and that has long-term commercial significance for agricultural production.***

***(8) "Forest land" means land primarily devoted to growing trees for long term commercial significance. "Long term commercial significance" includes the growing capacity, productivity, and soil composition of the land for long-term commercial production in consideration with the land's proximity to population areas, and the possibility of more intense uses of the land.***

***WAC Definitions - (11) Long term commercial significance includes the growing capacity, productivity and soil composition of the land for long term commercial production, in consideration with the lands proximity to population areas, and the possibility of more intense uses of land. Long term commercial significance means the land is capable of producing the specified natural resources at the commercially sustainable levels for at least the twenty year planning period, if adequately conserved.***

To determine appropriate locations in Clark County for these resource areas, while complying with GMA requirements, Clark County Citizens United, Inc. went to the Soil Survey of Clark County, Washington by the United States Department of Agriculture Soil Conservation Service/ Washington Agricultural Experiment Station ; the Washington State University Clark County Extension Commercial Horticulture; the Washington State Department of Natural Resources; and the Washington State Farm Forestry Association. As one studies the available information and the soils manual, one can get a better perspective as to how lands in Clark County would fit in. One can then highlight where commercially viable and prime/preferred soils are located for both agriculture and forest land on the maps within the manual. By doing so, one clearly sees that prime forest soils of Cinebar Loam, CnB, CnD, CnE, and CnG are primarily in the Northeast corner of the county. There are none

South of that. It's interesting to note that even Gifford Pinchot National forest has very little prime forest soils. In agriculture lands, there is very little prime agriculture soil of Hillsboro Loam, HIA, HIB, HIC, HID, HIE, and HIF anywhere in the county, and when there is, it is in pockets, such as Meadow Glade, Brush Prairie and Vancouver.

According to the Washington State University Clark County Extension Commercial Horticulture website, it states, ..." *best soils for farming is the Hillsboro series, which can be used for many different types of high-value horticulture crops, as well as for pasture for animals*". It is interesting to note that the County Service Center, which houses the commissioner's offices, is built on prime agriculture soil.

During research of this information, one can compare it, to the GMA and it's WAC's. The criteria language seems pretty clear in the GMA regarding these lands, but even more clear in the WAC. There it explains what is meant by "*long term commercial significance*". It states....."*producing the specified natural resources at commercially sustainable levels for at least the 20 year planning period*", in addition to the other language in the RCW's. Other than at these levels, resource activity is not of "long term commercial significance" nor is it "devoted to" on the majority of the land in Clark County, using the GMA and WAC criteria. This would mean that large acre parcels of 10, 20, 40 and 80 acres, are not necessary to preserve the land for commercial resource purposes because the resource only provides a small portion of the *annual* income, and for many years, during the growth stages, produces no income at all. But, in a smaller rural parcel, that has limited agriculture or forest use, a once a season or once every 40 year harvest on numerous parcels of the same size, provides much needed employment for those persons harvesting those limited crops.

According to Scott Levanen, owner of Levanen Inc., a company that has specialized in tree farm management, logging, reforestation and timber cruising since 1988, "*To produce a viable commercial crop, many small trees that grow tall is best. How tall the trees are, is an indication of how good the soil is. The prime and preferred soil for growing trees in Clark County is Cinebar Loam. The height, diameter, and number and size of the limbs determines the commercial quality of a tree. A five acre plantation will do well, if there is enough light for the trees to grow tall. Such a crop will not do well next to larger trees that give too much shade.*

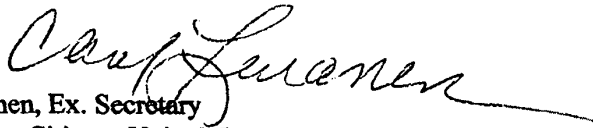
*After a five acre parcel is harvested and reforested, the trees will not be merchantable until 20 to 30 years, at which time thinning takes place. A mature and substantial crop would not be realized until 40 to 50 years. At harvest, a mature stand of timber on a five acre parcel will generate 20,000 board feet per acre, with a total of 100,000 board feet in a 40 year cycle. At that time and at the current 2014 market, the gross earnings would be \$70,000.00. The state timber tax, along with a 30% harvest cost must then be applied.*

*The net income for the harvest would be approximately \$45,000 for the cycle. After the logging has taken place, the land is prepared for the new crop. First it is*

sprayed for nuisance plants, and then the trees are planted in a 10X10 foot space, or 400 stems to the acre. This takes into account loss from deer grazing and other overgrowth plants. At age 20 it is thinned to 180 to 200 trees per acre. Ideally the trees should be 55 to 60 feet tall, having grown three feet a year. The diameter at breast height (DBH) is 9-10 inches. The thinned trees are sold for pulp wood at the lower market rate at the time, currently at \$250.00 per 1000 board feet. A very small percentage might also go for saw logs and generate \$550.00 per 1000 board feet. Thinned trees can be sold for saw logs, if they have a 5 inch top and are 16 to 40 feet long. At 40 years or full harvest, the tree should be 90 to 95 feet tall and be 14-16 inches DBH. Value is lost if a tree is 30 inches or larger DBH. The market expects logs that have an 8 inch plus top and are 26 to 40 feet in length. These trees are currently sold for \$750.00 per thousand board feet, according to the quality of the log. A ten year old stand is worth nothing in the commercial markets. For forestry to be sustainable and commercially viable for long term commercial production, projections must look fifty years ahead. In addition, the ability to harvest the timber crop is an essential part of the picture. Rules and regulations come and go and many times prevent harvest of the trees, which results in a total loss of commercial value. The markets for timber fluctuate from high to low. Harvest of the trees should take place during a high market, otherwise the financial loss could be too great. If a person buys property for the purpose of growing commercial timber, they must take this into account."

If one extrapolates these figures out, a person would have to have approximately 300 acres to make a viable long term, commercial forest or farm that is devoted to the resource and produces a consistent annual income. Even then, it is questionable whether the markets will bear the figures out, particularly if one purchased the land for such a purpose. Looking at the maps, one can find barely a handful, if even that, of land that fits those dimensions. It is ludicrous that Clark County insists on zoning myriads of small rural parcels into a forest or agriculture resource zone. The GMA is a document of the Washington State Department of Commerce. It's purpose is to encourage economic prosperity in the state. It is not a document that was adopted to lock up rural land in large lot zoning, for no verifiable reason, under the guise of calling it resource. That is why the GMA has specific language and criteria for such lands, to assure they are not confused with rural lands. Resource lands have to make money in a meaningful way and consistently for 20 years. If they don't, the GMA says to consider another or better use for those lands, considering what is already in place on the ground. As Clark County updates the Comprehensive Plan, they must give deference to the Growth Management Act mandates of long term commercial significance and devotion to resource lands.

Sincerely,



Carol Levanen, Ex. Secretary  
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Battle Ground, Washington 98604