

10/21 Rec'd - Carol Levanen
(Public Comment)

CC'd - Bacc
Orliako
Wilsonnell
Peter Silliman
October 21, 2014

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

* 7 1 1 3 7 6 *
CP16#0357

Re: Draft Environmental Impact Statement for the Comprehensive Growth Management Plan of Clark County, Battle Ground, Camas, La Center, Ridgefield, Vancouver, Washougal, and Yacolt - August 25, 2006

On page 60 in the Draft EIS, it discusses SETTINGS, IMPACTS AND MITIGATION. In item I Earth - A. Soils - 1 Setting, it discusses agriculture and forest soils. It reads, "The GMA requires local jurisdictions to identify and protect agriculture and timber lands of long term commercial significance. The Washington State Department of Community and Economic Development (CTED) recommends using the soil classification system developed by the Natural Resource Conservation Service (NRCS) and establishing larger minimum lot sizes to ensure the commercial viability of resource industries. The most recent comprehensive soil survey of Clark County was completed by the MRCS in 1972. Since soil does not change rapidly, information from the 1972 survey can still be considered reliable."

The NRCS has classified the soils of Clark County into eight major soil associations: Sauvie, Puyallup, found in the bottomlands and flood plains; Hillsboro, Gee, Odne, Hillsboro Dollar, Cove, and Lauren, Sifton, Wind River, found in terraces; Hesson, Olequa and Hesson Olympic, found in uplands; and Cinebar Yacolt and Olympic, Kinney, found in the foothills.

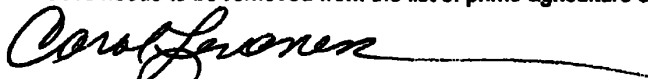
...The GMA requires protection of Agricultural land, which is defined to some extent by soil suitability. It is not acceptable under the GMA to propose unnecessary conversion of agriculturally viable land to urban uses."

The soils mentioned in the Draft EIS are actually substandard soils of Class III to CI V, with a few in the Class II range.

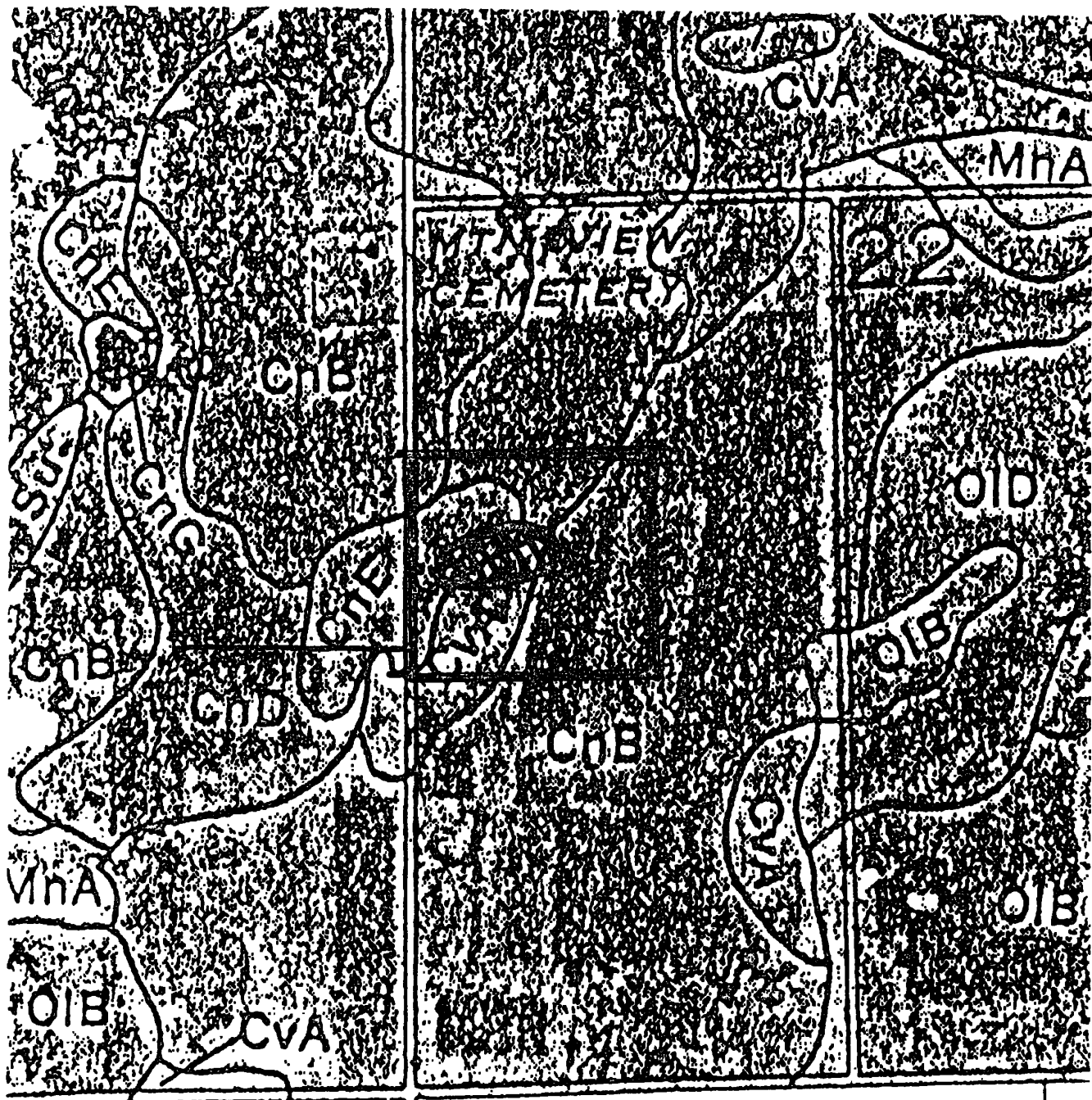
When a man was in the process of purchasing a 10 acre parcel of land to build a home on, massive buffers and setbacks around a man made pond were required. The county agent claimed it was a large wetland that had just been made into a pond. On November 22, 2006, a letter was sent to Keith Simonson regarding wetlands. It was signed by commissioners Boldt, Stuart and Morris. It states "The question of the pond, whether natural or manmade, does not change the existence of the wetland. Soils maps and aerial photographs dating back to 1955 show the historic spring and stream channel. United State Department of Agriculture soils maps indicate that the area determined to be wetland contains Cove Silty Clay Loam, a slowly drained type.

The county can't have it both ways. The resource soils maps are erroneous and need to be changed, and Cove needs to be removed from the list of prime agriculture soils.

Sincerely,



Carol Levanen, Ex. Secretary
Clark County Citizens United, Inc.
P.O. Box 2188, Battle Ground, Washington 98604



(Joins sheet 17)



proud past, promising future

CLARK COUNTY
WASHINGTON

BOARD OF CLARK COUNTY COMMISSIONERS

Betty Sue Morris • Marc Boldt • Steve Stuart

November 22, 2006

Carol Levanen
PO Box 2188
Battle Ground, WA 98604

Dear Ms. Levanen:

Thank you for making us aware of the recent issues encountered by Keith Simonson regarding wetlands. We certainly agree that wetland ordinances must be applied in a flexible, balanced, and reasonable manner.

We have consulted our staff and have some additional details that you will likely appreciate.

- No Wetland or Habitat permit is required for the construction of the house in the area that he has chosen.
- The question of the pond, whether natural or manmade, does not change the existence of the wetland. Soils maps and aerial photographs dating back to 1955 show the historic spring and stream channel. United States Department of Agriculture soils maps indicate that the area determined to be wetland contains Cove Silty Clay Loam, a slowly drained type.
- His proposal to groom and enhance the pond also meets the exemption allowing removal of non-native weeds and blackberries. Native replanting and enhancements in wetland and buffers are also exempt.
- These pre-determinations are an overview in order to assist citizens in evaluating property. It is meant to be a service to the citizen by providing a quick decision. He has the right to a second opinion from a hired, private sector biologist.
- If he decides to purchase the property and build a house, there is no additional charge for another Habitat permit.

We hope that this information will be of help to you and Mr. Simonson and clears up any uncertainty about permit requirements. If you have any additional questions, you may call Marian Anderson, Community Development Ombudsman, for assistance at 360.397-2375 ext.4487.

Sincerely,

Marc Boldt
Chair

Steve Stuart
Commissioner

Betty Sue Morris
Commissioner

Lr 06-253
C: Community Development

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3. The land has long-term commercial significance. To determine this factor, counties should consider the following

- Classification of prime and unique farmland soils mapped by NRCS
- Availability of public facilities and services, including roads used for transporting agricultural products
- Tax status under Chapter 84.34 RCW
- Relationship or proximity to urban growth areas
- Predominant parcel size
- Land use patterns and their compatibility with agricultural practices
- Intensity of nearby land uses
- History of land development permits
- Land values under alternative uses
- Proximity to markets

Counties may consider other factors, including:

- Food security issues, such as providing food supplies for food banks, schools and institutions, vocational training opportunities in agriculture and heritage or artisanal foods
- Agricultural lands of local importance, as determined through public consultation

OVERVIEW OF AGRICULTURAL LANDS IN GRAYS HARBOR COUNTY

Prime Farmland Soils

Prime farmland soils cover approximately 171,800 acres within Grays Harbor County, which accounts for approximately 14.0% of the county's land area. Exhibit A-1 is a map showing the general location of prime agricultural soils in Grays Harbor County.

There are 35 soil types classified as prime farmland soils in Grays Harbor County. Prime farmland soils have an adequate and dependable supply of moisture from precipitation or irrigation. Temperature and growing season are favorable, and the level of acidity or alkalinity is acceptable. The soils have few, if any, rocks and are permeable to water and air. They are not excessively erodible or saturated with water for long periods and are not flooded during growing season. The slope ranges mainly from 0 to 8 percent.

Appendix A: Counties and Cities that Qualify for the Ten Year Update

This list is current through April 1, 2007 when the next set of population estimates will be produced by the Washington State Office of Financial Management. Because these criteria are based on population and growth rates, CTED should be consulted after that date to determine if a county or city is eligible for an extension to the RCW 36.70A.130(4) update deadlines.

Growth Management Act – Timelines Bill – ESSB 6427

An act relating to schedules for the review of comprehensive plans and development regulations for certain cities and counties; reenacting and amending RCW 36.70A.130; and creating a new section. The law defines small and slow-growing counties as those with a population of less than 50,000 and a growth rate of 17 percent or less over the ten-year period prior to their update deadline. Small and slow-growing cities are those with a population of 5,000 or less and a growth rate of 17 percent or less over the same ten-year period.

| Qualifying counties | Qualifying cities within |
|--------------------------------|---|
| Adams | Ritzville; Washtucna |
| Asotin | Asotin |
| Columbia | Dayton; Starbuck |
| Douglas | Bridgeport; Mansfield; Waterville |
| Ferry | Republic |
| Garfield | Pomeroy |
| Klickitat | Bingen; Goldendale; White Salmon |
| Lincoln | Almira; Creston; Davenport; Harrington; Odessa; Sprague; Wilbur |
| Okanogan | Brewster; Coulee Dam; Elmer City; Nespelem; Okanogan; Omak; Oroville; Pateros; Tonasket; Twisp; Winthrop |
| Pacific | Iiwaco; Long Beach; Raymond; South Bend |
| Pend Oreille | Cusick; Ione; Metaline; Metaline Falls; Newport |
| Skamania | Stevenson |
| Stevens | Chewelah; Colville; Kettle Falls; Northport; Springdale |
| Wahkiakum | Cathlamet |
| Whitman | Albion; Colfax; Colton; Endicott; Garfield; La Crosse; Malden; Lamont; Oakesdale; Palouse; Rosalia; St. John; Tekoa; Uniontown, |
| <i>Non-qualifying counties</i> | <i>Qualifying cities located in non-qualifying counties</i> |
| Benton | Benton City |
| Chelan | Cashmere; Chelan; Leavenworth |
| Cowlitz (CARL) | Castle Rock (CARL) |
| Franklin | Kahlotus |
| Grant | Coulee City; Electric City; George; Grand Coulee; Hartline; Krupp; Soap Lake; Wilson Creek |
| Grays Harbor (CARL) | Cosmopolis; Elma; McCleary; Montesano; Oakville; Westport |
| Island | Coupeville; Langley |
| Kittitas | Cle Elum; Kittitas; Roslyn |
| Lewis | Mossyrock; Morton; Pe Ell; Toledo; Winlock |
| Mason | No cities qualify |
| San Juan | No cities qualify |
| Skagit | Concrete; La Conner |
| Spokane | Deer Park; Fairfield; Latah; Medical Lake; Millwood; Rockford; Sprangle; Waverly |
| Walla Walla | Prescott; Waitsburg |
| Yakima | Naches; Wapato |

Source: Washington State Department of Community, Trade, and Economic Development, "Growth Management Act Timelines" Q&A p. 3 accessed on January 16, 2006 at http://www.cted.wa.gov/_CTED_documents/ID_3294_Publications.pdf