

Schroader, Kathy



From: Tim Trohimovich <Tim@futurewise.org>
Sent: Wednesday, September 16, 2015 6:20 PM
To: Cnty 2016 Comp Plan
Subject: DSEIS comments on Ridgefield UGA Expansion
Attachments: Futurewise Comments on Comp Plan DSEIS Ridgefield UGA Expansion Sept 16 2015 Final.pdf

Dear Sirs and Madams:

Enclosed please find Futurewise's comments on the Draft Supplemental Environmental Impact Statement for the Clark County 2016 Comprehensive Growth Management Plan Update (August 2015) relating the Ridgefield urban growth area expansion. We are also overnighting the paper original and the referenced enclosures to your offices, not your PO Box.

Please contact me if you require anything else.

Tim Trohimovich, AICP
Futurewise | Director of Planning & Law
816 Second Avenue, Suite 200 | Seattle, Washington 98104
p. 206.343.0681 Ext. 118
Email: tim@futurewise.org





September 16, 2015

Clark County Community Planning
Attn: 2016 Comp Plan Record
PO Box 9810
Vancouver, Washington 98666-9810

Dear Sirs and Madams:

Subject: Comments on the Draft Supplemental Environmental Impact Statement for the Clark County 2016 Comprehensive Growth Management Plan Update (August 2015) relating the Ridgefield urban growth area expansion.

Sent via overnight delivery with enclosures and via email to:
comp.plan@clark.wa.gov

Thank you again for the opportunity to comment on the *Draft Supplemental Environmental Impact Statement (Draft SEIS) for the Clark County 2016 Comprehensive Growth Management Plan Update*. In Futurewise's September 10, 2015 comment letter on the *Draft SEIS* we expressed concern that the Draft SEIS did not identify as one of the adverse impacts of Alternative 3 that the Ridgefield urban growth area expansion violated the Growth Management Act (GMA). This letter will show that the urban growth area (UGA) expansion violates the GMA for three independent reasons. First, under the GMA determinations as to agricultural lands of long-term commercial significance are to be made area-wide. The Ridgefield UGA expansion is only focusing on a small area violating this requirement. Second, the land proposed for an expansion meets the GMA requirements for agricultural land of long-term commercial significance and so cannot be included in an urban growth area unless the county or Ridgefield adopts a purchase or transfer of development rights program applicable to the property and retains its agricultural comprehensive plan designation and zoning. Third, the *Clark County Buildable Lands Report* shows that Ridgefield has a surplus of 280 net acres of residential land at the very low density of six dwelling units per acre and a surplus 168 net residential acres at the observed density.¹ So the SEIS should identify these GMA violations as disadvantages of Alternative 3.

Futurewise is working throughout Washington State to create livable communities, protect our working farmlands, forests, and waterways, and ensure a better quality of

¹ *Clark County Buildable Lands Report* pp. 9 – 10 (June 2015) accessed on Sept. 14, 2015 at: http://www.clark.wa.gov/thegrid/documents/061015WS_2015BUILDABLE_LANDS_REPORT.pdf and enclosed with the paper original of this letter.

life for present and future generations. We work with communities to implement effective land use planning and policies that prevent waste and stop sprawl, provide efficient transportation choices, create affordable housing and strong local businesses, and ensure healthy natural systems. We are creating a better quality of life in Washington State together. We have members across Washington State including Clark County.

Ridgefield urban growth area expansion violates the GMA because the agricultural comprehensive plan de-designation does not take an area-wide approach

In *Futurewise v. Benton County*, the Growth Management Hearings Board reversed a county de-designation of agricultural lands of long-term commercial significance to put the land in an urban growth area.² The Board wrote:

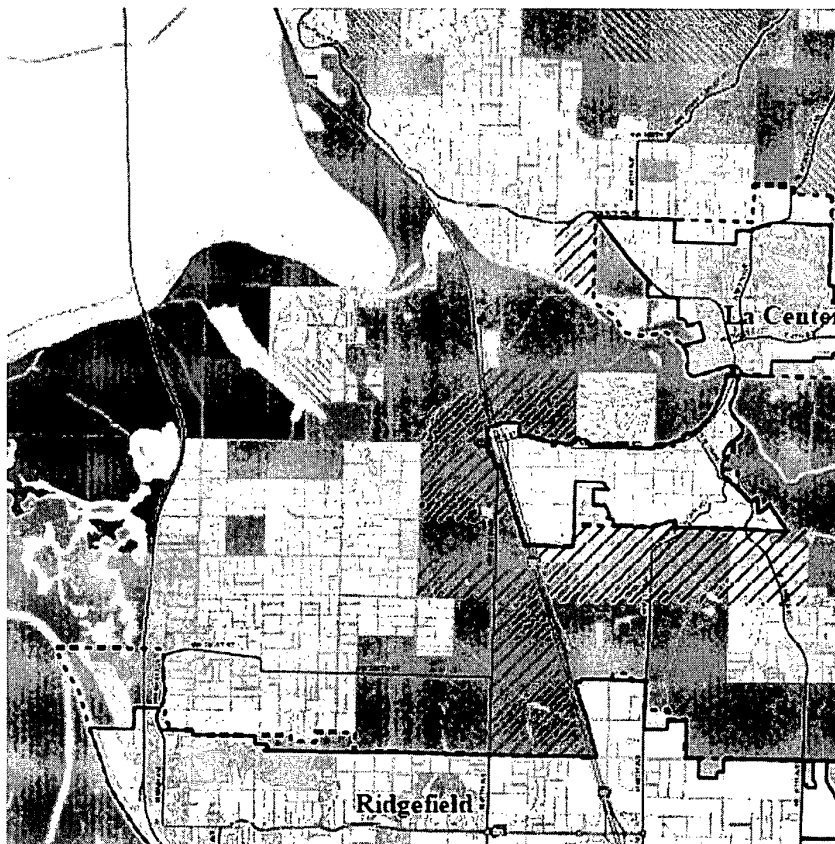
The Board considers Benton County's de-designation of agricultural lands for this small section of land, in isolation from a much larger County or area-wide study to be inappropriate and, by de-designating lands that qualify as agricultural lands of long term commercial significance, the County violated WAC 365-190-050 and corresponding GMA sections RCW 36.70A.030, RCW 36.70A.050, and RCW 36.70A.170.³

Like 1,263 acres de-designated in *Futurewise v. Benton County*, the 111 acres that is proposed to be dedesignated and included in the Ridgefield UGA is part of a larger area. The excerpt from the *County/UGA Comprehensive Plan Clark County, Washington* shown below documents that the Agriculture designation runs from Ridgefield north to north of La Center. So just considering the dedesignation on the 111 acres violates WAC 365-190-050 and corresponding GMA sections just as the land dedesignated in *Futurewise v. Benton County* did. The comprehensive plan map legend and the map follow on page 3 below.

² *Futurewise v. Benton County*, GMHB Case No. 14-1-0003, Final Decision and Order (Oct. 15, 2014) at 37 of 38 accessed on Sept. 16, 2015 at: <http://www.gmhb.wa.gov/LoadDocument.aspx?did=3658>

³ *Id.* at 35 of 38.

URBAN	Rural-10	OVERLAY	Urban Growth Boundary
Urban Low Density Residential	Rural-20	Urban Reserve	City Limits
Urban Medium Density Residential	Rural Center Residential	Industrial Urban Reserve	Rural Center
Urban High Density Residential	Rural Commercial	Railroad Industrial Urban Reserve	Three Creeks Special Planning Area
Neighborhood Commercial	Rural Industrial	Mining	
Community Commercial	Agriculture	Columbia River Gorge Scenic Area	
General Commercial	Agri-Wildlife	Mining Inside CRGSA	
Mixed Use	Parks/Open Space	Rural Center Mixed Use	
Industrial	Forest Tier 1		
Heavy Industrial	Forest Tier 2		
Public Facility	Airport		
Bonneville Power Administration	Urban Reserve		
RURAL/RESOURCE	Water		
Rural-5			



Source: *County/UGA Comprehensive Plan Clark County, Washington* accessed on Sept. 16, 2015 at:
http://www.clark.wa.gov/Planning/comp_plan/documents/AmendComplan_2013.pdf

The Ridgefield urban growth area expansion violates the GMA because the property meet the GMA and Clark County Criteria for Agricultural Lands of Long-Term Commercial Significance

Under the GMA, the “land speaks first” and agricultural lands of long-term commercial significance must be conserved and excluded from urban growth areas.⁴ The Supreme Court has identified the reason for the conservation mandate:

The GMA set aside special land it refers to as “natural resource lands,” which include agricultural, forest, and mineral resource lands. “Natural resource lands are protected not for the sake of their ecological role but to ensure the viability of the resource-based industries that depend on them. Allowing conversion of resource lands to other uses or allowing incompatible uses nearby impairs the viability of the resource industry.”⁵

Natural resource lands must be conserved.⁶ The Washington State Supreme Court has identified a three part test for identifying agricultural land of long-term commercial significance, one of the three types of natural resource lands,

[W]e hold that agricultural land is land: (a) not already characterized by urban growth (b) that is primarily devoted to the commercial production of agricultural products enumerated in RCW 36.70A.030(2), including land in areas used or capable of being used for production based on land characteristics, *and* (c) that has long-term commercial significance for agricultural production, as indicated by soil, growing capacity, productivity, and whether it is near population areas or vulnerable to more intense uses.⁷

Clark County designated the area proposed for the Ridgefield UGA expansion as agricultural lands of long-term commercial significance.⁸ In designating the land, Clark County followed a reasoned process and considered the GMA’s mandate and goals and requirements, and found that these lands must be conserved.⁹ As this letter will show, that earlier decision was correct and the land still meets the GMA and Clark County criteria for agricultural land of long-term commercial significance.

⁴ *Bremerton v. Kitsap County*, CPSGMHB No. 95-3-0039, Final Decision and Order (Oct. 6, 1995), at 28.

⁵ *City of Redmond v. Central Puget Sound Growth Management Hearings Bd.*, 138 Wn.2d 38, 47, 14 P.3d 133 (1998), quoting Richard L. Settle & Charles G. Gavigan, *The Growth Management Revolution in Washington: Past, Present, and Future*, 16 *U. Puget Sound L. Rev.* 867, 907 (1993).

⁶ RCW 36.70A.060.

⁷ *Lewis County v. Western-Washington Growth Management Hearings Bd.*, 157 Wn.2d 488, 502, 139 P.3d 1096, 1103 (2006).

⁸ See the *County/UGA Comprehensive Plan Clark County, Washington* excerpt on page 3 of this letter.

⁹ *Clark County 20-Year Comprehensive Growth Management Plan 2004-2024* Chapter 3 Rural and Natural Resource Element pp. 3-7 – 3-8 (Dec. 2012) accessed on Sept. 16, 2015 at: http://www.clark.wa.gov/Planning/comp_plan/documents/WebVersion_AmORD2012-12-20.pdf

The area within the Ridgefield UGA expansion is not "characterized by urban growth"

The first of the Lewis County criteria are that the agricultural land is not already characterized by urban growth.¹⁰ None of the 111 acres are characterized by urban growth.¹¹ And except for a few small lots, neither are any of the adjoining lots in Ridgefield or any of the nearby agricultural and rural lots.¹²

The land is primarily devoted to the commercial production of agricultural products enumerated in RCW 36.70A.030(2)

The second *Lewis County* factor is that "agricultural land is land: ... that is primarily devoted to the commercial production of agricultural products enumerated in RCW 36.70A.030(2), including land in areas used or capable of being used for production based on land characteristics"¹³ The agricultural products enumerated in RCW 36.70A.030(2) are "horticultural, viticultural, floricultural, dairy, apiary, vegetable, or animal products or ... berries, grain, hay, straw, turf, seed, Christmas trees not subject to the excise tax imposed by *RCW 84.33.100 through 84.33.140, finfish in upland hatcheries, or livestock"

The area in which the Ridgefield UGA expansion is located is both used and capable of being used for agriculture. The Clark County MapsOnline 2014 aerial image, enclosed with the paper original of this letter, shows that the 111 acres and many of the properties in the vicinity are currently farmed. In addition, as Table 1 enclosed with this letter documents, the 111 acres are in the agriculture current use taxation program, so they property is used for agriculture.¹⁴ The Clark County Food System Council has identified all or nearly all of the 111 acres and much of the land in its

¹⁰ *Lewis County v. Western Washington Growth Management Hearings Bd.*, 157 Wn.2d 488, 502, 139 P.3d 1096, 1103 (2006).

¹¹ Clark County MapsOnline Property and Land Records Information 2014 aerial image and map showing tax lots and building footprints enclosed with the paper original of this letter, and the Aerials Showing Parcel, the Clark County Property Information Account Summary, and the Clark County Property Information Land & Building Details for properties 213065000, 213066000, 213067000, 213068000, 213069000, 213070000, 213071000, 213072000, 213073000, 213074000, 213075000, 213076000, 213077000, 213078000, 213079000, 213080000, 213081000, 213082000 enclosed in the data CD included with the paper original of this letter in Appendix A.

¹² Clark County MapsOnline Property and Land Records Information 2014 aerial image and map showing tax lots and building footprints enclosed with the paper original of this letter, and the "Aerials Showing Parcel," the Clark County Property Information Account Summary, and the Clark County Property Information Land & Building Details enclosed in the data CD included with the paper original of this letter in Appendix B.

¹³ *Lewis County*, 157 Wn.2d at 502, 139 P.3d at 1103.

¹⁴ See also the Clark County Property Information Account Summaries for properties 213065000, 213066000, 213067000, 213068000, 213069000, 213070000, 213071000, 213072000, 213073000, 213074000, 213075000, 213076000, 213077000, 213078000, 213079000, 213080000, 213081000, 213082000 enclosed in the data CD included with the paper original of this letter in Appendix A.

vicinity as “Clark County’s Best Farm Land.”¹⁵ The Clark County Food System Council identified this land “by looking at characteristics of the land that make it suitable for food production.”¹⁶ These included soils with land capability 1 through 4 soils, land that is flat and rolling, lands that have at least four acres outside the buffers around stream habitats, and “lands that are currently zoned for agriculture or rural residences. ... [They] excluded lands that are tax exempt because they are owned by churches, land trusts, or governments.”¹⁷

The land has long-term commercial significance

The third *Lewis County* factor is that “agricultural land is land: ... (c) that has long-term commercial significance for agricultural production, as indicated by soil, growing capacity, productivity, and whether it is near population areas or vulnerable to more intense uses.”¹⁸ As Table 2 enclosed with this letter documents, over 91 percent of the expansion area has Land Capability 1 through 4 soils. These are agriculturally productive soils.¹⁹ Most of the nearby lands also have these high quality agricultural soils.²⁰

In addition, Table 2 also documents that 69 percent of the UGA expansion has prime farmland. Another 11 percent has farmland of statewide importance soils.

Prime farmland is land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops, and is also available for these uses (the land could be cropland, pastureland, rangeland, forest land, or other land, but not urban built-up land or water). It has the soil quality, growing season, and moisture supply needed to economically produce sustained high yields of crops when treated and managed, including water management, according to acceptable farming methods. In general, prime farmlands have an adequate and dependable water supply from precipitation or irrigation, a favorable temperature and growing season, acceptable acidity or alkalinity, acceptable salt and sodium content, and few or no rocks. They are permeable to water and air. Prime farmlands are not excessively erodible or saturated with water for a long period of

¹⁵ *Promoting Agricultural Food Production in Clark County*, A proposal developed by the Clark County Food System Council p. 4 (November 2013) enclosed with the paper original of this letter.

¹⁶ *Id.* p. 5.

¹⁷ *Id.*

¹⁸ *Lewis County*, 157 Wn.2d at 502, 139 P.3d at 1103.

¹⁹ USDA Natural Resources Conservation Service Minnesota, *Land Capability Classes* webpage p. 1 accessed on Sept. 16, 2015 at:

http://www.nrcs.usda.gov/wps/portal/nrcs/detail/mn/technical/dma/nri/?cid=nrcs142p2_023556 and enclosed with the paper original of this letter.

²⁰ *Promoting Agricultural Food Production in Clark County*, A proposal developed by the Clark County Food System Council pp. 4 – 5 (November 2013).

time, and they either do not flood frequently or are protected from flooding.²¹

The productivity of these soils is confirmed by the *Clark County Comprehensive Plan 2004-2024* which states:

The maps were used [in the 1990s] to identify Clark County's most productive farmland. This process identified farm areas that included major patterns of high quality soils and agricultural activity in areas with generally larger parcels.²²

So the soils, growing capacity, and productivity show this area has long-term commercial significance. According to data we obtained from the Clark County Clark County "Building Permit History" webpages, there have not been any urban development permits in the vicinity of the proposed UGA expansion including adjacent parcels in Ridgefield.²³ So this areas are not near population areas and are not vulnerable to more intense uses, especially if the area retains its protective Agriculture designation and zoning. Since this land qualifies to be designated as agricultural lands of long-term commercial significance, Clark County is "required to assure the conservation of agricultural lands and to assure that the use of adjacent lands does not interfere with their continued use for the production of food or agricultural products."²⁴ And the *Clark County Buildable Lands Report* documents that Ridgefield has no need to expand its UGA to accommodate residential growth.²⁵ So under the statutory factors in RCW 36.70A.030(10) this area has long-term commercial significance.

Clark County also considered the following factors in designated agricultural lands.²⁶ Those factors show the land in the UGA expansion still qualifies as agricultural lands of long-term commercial significance.

²¹ 7 CFR § 657.5(a)(1).

²² *Clark County 20-Year Comprehensive Growth Management Plan 2004-2024* Chapter 3 Rural and Natural Resource Element p. 3-8 (Dec. 2012).

²³ "Building Permit History" webpages in Appendices A and B enclosed on the data CD included with the paper original of this letter. See also the Clark County MapsOnline Property and Land Records Information 2014 aerial image and map showing tax lots and building footprints enclosed with the paper original of this letter.

²⁴ *Soccer Fields*, 142 Wn.2d at 556, 14 P.3d at 140 emphasis in original.

²⁵ *Clark County Buildable Lands Report* pp. 9 – 10 (June 2015) accessed on Sept. 14, 2015 at: http://www.clark.wa.gov/thegrid/documents/061015WS_2015BUILDABLE_LANDS_REPORT.pdf and enclosed with the paper original of this letter.

²⁶ *Clark County 20-Year Comprehensive Growth Management Plan 2004-2024* Chapter 3 Rural and Natural Resource Element p. 3-7 (Dec. 2012).

"The availability of public facilities"

The City of Ridgefield does not have water or sewer facilities to serve any of the UGA expansion or its vicinity.²⁷ There is no evidence of any other urban public facilities serving the UGA expansion area.²⁸ So this criterion shows the area has long-term commercial significance for agriculture.

"Tax status"

All of the land in the UGA expansion and many neighboring parcels are in the agriculture current use taxation program.²⁹ So this criterion shows the area has long-term commercial significance for agriculture.

"The availability of public services"

No urban supporting public services were identified in the urban growth area expansion or vicinity.³⁰ So this criterion shows the area has long-term commercial significance for agriculture.

"Relationship or proximity to urban growth areas"

While the UGA expansion abuts Ridgefield and the UGA, it is currently outside of the UGA and designated as agricultural lands of long-term commercial significance. There is currently no urban development on the UGA expansion or immediately south in Ridgefield.³¹ As was documented above, there are no urban serving public facilities or services available to the UGA expansion. *Clark County Buildable Lands Report* shows

²⁷ *City of Ridgefield Clark County, Washington General Sewer Plan Volume 1* Figures 2-1 and 2-11 (March 2013) accessed on Sept. 16, 2015 at: <http://www.crwwd.com/documents/RidgefieldGeneralSewerPlan2013.pdf> and cited pages enclosed with the paper original of this letter.

²⁸ Clark County Property Information Account Summary for properties 213065000, 213066000, 213067000, 213068000, 213069000, 213070000, 213071000, 213072000, 213073000, 213074000, 213075000, 213076000, 213077000, 213078000, 213079000, 213080000, 213081000, 213082000 enclosed in the data CD included with the paper original of this letter in Appendix A.

²⁹ Table 1 Summary Property Data for Properties in the Ridgefield Urban Growth Area Expansion enclosed and the Account Summary webpages for parcels 213798000, 212813000, 212812000, 212778000, 212777000, 212799000, 213033000, 213083000, 213028000, and 213018000 enclosed in the data CD included with the paper original of this letter in Appendix B.

³⁰ *City of Ridgefield Clark County, Washington General Sewer Plan Volume 1* Figures 2-1 and 2-11 (March 2013); Clark County Property Information Account Summary for properties 213065000, 213066000, 213067000, 213068000, 213069000, 213070000, 213071000, 213072000, 213073000, 213074000, 213075000, 213076000, 213077000, 213078000, 213079000, 213080000, 213081000, 213082000 enclosed in the data CD included with the paper original of this letter in Appendix A.

³¹ Google Earth April 17, 2015 image of the UGA expansion vicinity enclosed with the paper original of this letter and on the data CD enclosed with this letter; Clark County MapsOnline Property and Land Records Information map showing tax lots and building footprints enclosed with the paper original of this letter.

there is no need to expand the Ridgefield UGA.³² So this area does not have a relationship with the UGA that indicates it needs to be included. So this criterion indicates that the land has long-term commercial significance for agriculture.

“Predominant parcel size”

While Table 1 documents that the UGA expansion has lots ranging from just over five to 14 acres, the owners are related companies and the land is managed as a single unit. This can be seen in the aerial images where the plowing and fields cross property lines.³³ Farms are often composed of multiple parcels of land.³⁴ So the 111 acres is larger than Clark County’s average farm size of 39 acres.³⁵ So this criterion indicates that the land has long-term commercial significance for agriculture.

“Land use settlement patterns and their compatibility with agricultural practices”

As was documented above, the uses near the proposed UGA expansion, including land in Ridgefield, consist of agriculture and rural uses.³⁶ So the land settlement patterns are generally compatible with agriculture and the area has long-term commercial significance for agriculture.

“Intensity of nearby land uses”

Again, the uses near the proposed UGA expansion, including land in Ridgefield, consist of agriculture and rural type uses.³⁷ So the intensity of nearby land uses are generally compatible with agriculture and the area has long-term commercial significance for agriculture.

³² Clark County Buildable Lands Report pp. 9 – 10 (June 2015).

³³ Clark County MapsOnline Property and Land Records Information 2014 aerial image.

³⁴ United States Department of Agriculture, National Agricultural Statistics Service, 2012 Census of Agriculture Washington State and County Data Volume 1 • Geographic Area Series • Part 47 AC-12-A-47 p. B-13 (May 2014) accessed on Sept. 16, 2015 at:

http://www.agcensus.usda.gov/Publications/2012/Full_Report/Volume_1_Chapter_2_County_Level/Washington/wav1.pdf. A copy of 2012 Census of Agriculture Washington State and County Data Volume 1 was enclosed with the paper original of Futurewise’s Sept. 10, 2015 letter.

³⁵ United States Department of Agriculture, National Agricultural Statistics Service, 2012 Census of Agriculture Washington State and County Data Volume 1 • Geographic Area Series • Part 47 AC-12-A-47 Chapter 2: County Level Data, Table 8. Farms, Land in Farms, Value of Land and Buildings, and Land Use: 2012 and 2007 p. 271 (May 2014).

³⁶ Google Earth April 17, 2015 image of the UGA expansion vicinity; Clark County MapsOnline Property and Land Records Information map showing tax lots and building footprints.

³⁷ Google Earth April 17, 2015 image of the UGA expansion vicinity; Clark County MapsOnline Property and Land Records Information map showing tax lots and building footprints.

“History of land development permits issued nearby”

According to data we obtained from the Clark County Clark County “Building Permit History” webpages, there have not been any urban development permits in the vicinity including adjacent parcels in Ridgefield.³⁸ So this criterion indicates the area has long-term commercial significance for agriculture.

“Land values under alternative uses”

The Washington State Supreme Court has noted that uses other than agriculture will always be more profitable and this alone does not justify the loss of natural resource land.³⁹ In the present case, there are numerous parcels that could be included in the Ridgefield UGA without converting the agricultural land. The excerpt from the comprehensive plan map on page 3 of this letter shows rural land abutting the Ridgefield UGA. In addition, there is no need to expand the Ridgefield UGA for residential development.⁴⁰ So land prices should not be the steering factor in the UGA expansion decision.

“Proximity to markets”

This area is close to Ridgefield and has good access to I-5.⁴¹ There are roads in the area that can bring agricultural products to market. The Globalwise, Inc. *Analysis of the Agricultural Economic Trends and Conditions in Clark County, Washington Preliminary Report* shows that local farmers do sell their products at local markets.⁴² The two major poultry processors are in Western Washington,⁴³ so this area has good access to them. The area’s and the county’s good access to I-5 also provides good access to regional livestock markets.⁴⁴ So this criterion shows the area has long-term commercial significance.

³⁸ “Building Permit History” webpages in Appendices A and B enclosed on the data CD included with the paper original of this letter. See also the Clark County MapsOnline Property and Land Records Information 2014 aerial image and map showing tax lots and building footprints enclosed with the paper original of this letter.

³⁹ *City of Redmond*, 136 Wn.2d at 52 – 53, 959 P.2d at 1097.

⁴⁰ *Clark County Buildable Lands Report* pp. 9 – 10 (June 2015).

⁴¹ Google Earth April 17, 2015 image of the UGA expansion vicinity.

⁴² Globalwise, Inc., *Analysis of the Agricultural Economic Trends and Conditions in Clark County, Washington Preliminary Report* p. 27 (Prepared for Clark County, Washington: April 16, 2007) accessed on Sept. 16, 2015 at:

http://www.clark.wa.gov/planning/comp_plan/documents/final_ag_analysis_prelim_report.pdf and cited pages enclosed with the paper original of this letter.

⁴³ *Id.* at p. 24.

⁴⁴ Stephanie Meenach, Eric L. Jessup, and Kenneth L. Casavant, *Transportation and Marketing Needs for the Washington State Livestock Industry SFTA Research Report #12* p. 5 (Washington State University School of Economic Sciences: Nov. 2004) accessed on Sept. 16, 2015 at:

http://www.sfta.wsu.edu/research/reports/pdf/rpt_12_livestock.pdf and enclosed with the paper original of this letter.

In sum, all but one of the Clark County Comprehensive Plan factors, land values under alternative uses, show that this area has long-term commercial significance for agriculture. And the Washington State Supreme Court has concluded that land values under alternative uses should not be the deciding factor. The subareas also meet the statutory factors. So dedesignating this area would violate the Growth Management Act and the Clark County Comprehensive Plan.

Ridgefield urban growth area (UGA) is currently oversized and so the expansion violates the GMA limits on UGA sizes

The Washington State Supreme Court has held that an “UGA designation cannot exceed the amount of land necessary to accommodate the urban growth projected by the Washington State Office of Financial Management (OFM), plus a reasonable land market supply factor.”⁴⁵ According to the *Clark County Buildable Lands Report*, the Ridgefield urban growth area (UGA) already has more land than needed to accommodate its 20-year population projection.⁴⁶ So expanding the Ridgefield UGA violates the GMA.

Conclusion

As we have seen, the proposed Ridgefield UGA expansion violates the GMA in three different and independent ways. The Final SEIS should summarize the evidence included with this letter and state that the Ridgefield UGA expansion contains the three GMA violations.

Some may argue that the paving over of 111 acres of valuable farmland is not a big loss. But the Washington State Department of Agriculture’s *Washington Agriculture Strategic Plan 2020 and Beyond* documents the need to conserve existing agricultural lands to maintain the agricultural industry and the jobs and incomes the industry provides.⁴⁷ As the strategic plan concludes “[t]he future of farming in Washington is heavily dependent on agriculture’s ability to maintain the land resource that is currently available to it.”⁴⁸

Thank you for considering our comments. If you require additional information please contact me at telephone 206-343-0681 Ext. 118 and email tim@futurewise.org

⁴⁵ *Thurston County v. Western Washington Growth Management Hearings Bd.*, 164 Wn.2d 329, 351 – 52, 190 P.3d 38, 48 – 49 (2008). See also RCW 36.70A.110 and RCW 36.70A.115 which limit the size of UGAs.

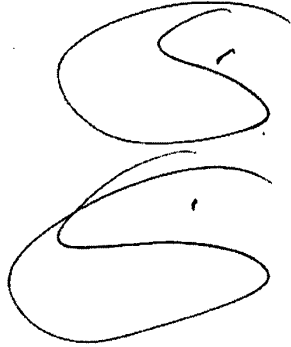
⁴⁶ *Clark County Buildable Lands Report* pp. 9 – 10 (June 2015) accessed on Sept. 14, 2015 at: http://www.clark.wa.gov/thegrid/documents/061015WS_2015BUILDABLE_LANDS_REPORT.pdf and enclosed with the paper original of this letter.

⁴⁷ Washington State Department of Agriculture, *Washington Agriculture Strategic Plan 2020 and Beyond* pp. 50 – 52 (2009) accessed on Sept. 10, 2015 at: <http://agr.wa.gov/fofi/> and cited excerpts enclosed with the paper original of Futurewise’s Sept. 10, 2015 letter commenting on the Draft SEIS.

⁴⁸ *Id.* at p. 50.

Attn: 2016 Comp Plan Record Comments on SEIS
September 16, 2015
Page 12

Very Truly Yours,

A handwritten signature in black ink, consisting of two large, stylized, overlapping loops that resemble the letter 'S' or 'T'.

Tim Trohimovich, AICP
Director of Planning & Law

Enclosures

Table 1 Summary Property Data for Properties in the Ridgefield Urban Growth Area Expansion

Property Identification Number	Owner & Mailing Address	Sale Date	In Agricultural Current Use Taxation Program	Buildings	Permits	Parcel Size (Acres)
213065000	RDGB ROYAL FARMS LLC 8320 NE HIGHWAY 99 VANCOUVER WA, 98665 US	11/24/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None	5.09
213066000	RDGK REST VIEW ESTATES LLC 8320 NE HIGHWAY 99 VANCOUVER WA, 98665 US	10/06/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None	5.24
213067000	RDGM RAWHIDE ESTATES LLC 8320 NE HIGHWAY 99 VANCOUVER WA, 98665 US	09/30/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None	5.35
213068000	RDGB ROYAL FARMS LLC 8320 NE HIGHWAY 99 VANCOUVER WA, 98665 US	11/24/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None	5.15
213069000	RDGK REST VIEW ESTATES LLC 8320 NE HIGHWAY 99	10/06/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None	5.05

Property Identification Number	Owner & Mailing Address	Sale Date	In Agricultural Current Use Taxation Program	Buildings	Permits	Parcel Size (Acres)
213070000	VANCOUVER WA, 98665 US	12/05/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None	5.02
213071000	RDGM RAWHIDE ESTATES LLC 8320 NE HIGHWAY 99 VANCOUVER WA, 98665 US	09/30/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None other than a determination of whether Tax Lots 79 and 87 are separate lots of record.	6.07
213072000	RDGB ROYAL FARMS LLC C/O ADMINISTRATIVE OFFICE 8320 NE HIGHWAY 99 VANCOUVER WA, 98665 US	11/24/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None	6
213073000	RDGM RAWHIDE ESTATES LLC 8320 NE HIGHWAY 99 VANCOUVER WA, 98665 US	09/30/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None	6.54

Property Identification Number	Owner & Mailing Address	Sale Date	In Agricultural Current Use Taxation Program	Buildings	Permits	Parcel Size (Acres)
213074000	RDGF RIVER VIEW ESTATES LLC, 8320 NE HIGHWAY 99 VANCOUVER WA, 98665 US	12/05/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None	6.02
213075000	RDGM RAWHIDE ESTATES LLC 8320 NE HIGHWAY 99 VANCOUVER WA, 98665 US	09/30/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None	5
213076000	RDGK REST VIEW ESTATES LLC 8320 NE HIGHWAY 99 VANCOUVER WA, 98665 US	10/06/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None	5
213077000	RDGM RAWHIDE ESTATES LLC 8320 NE HIGHWAY 99 VANCOUVER WA, 98665 US	09/30/2005	Yes. The Land is valued as Farm and Agricultural Land	House, barn, and outbuildings.	None	13.83
213078000	RDGS REAL VIEW LLC 8320 NE HIGHWAY 99	11/08/2005	Yes. The Land is valued as Farm and	None	None	5.87

Property Identification Number	Owner & Mailing Address	Sale Date	In Agricultural Current Use Taxation Program	Buildings	Permits	Parcel Size (Acres)
213079000	VANCOUVER WA, 98665 US RDGK REST VIEW ESTATES LLC 8320 NE HIGHWAY 99 VANCOUVER WA, 98665 US	10/06/2005	Agricultural Land Yes. The Land is valued as Farm and Agricultural Land	None	None other than a determination of whether Tax Lots 79 and 87 are separate lots of record.	6.87
213080000	RDGS REAL VIEW LLC 8320 NE HIGHWAY 99 VANCOUVER WA, 98665 US	11/08/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None	5.16
213081000	RDGS REAL VIEW LLC 8320 NE HIGHWAY 99 VANCOUVER WA, 98665 US	11/08/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None	5.16
213082000	RDGM RAWHIDE ESTATES LLC 8320 NE HIGHWAY 99 VANCOUVER WA, 98665 US	09/30/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None	5.17
Total Acreage						107.59

Sources: Clark County Property Information Account Summary, Clark County Property Information Land & Building Details, and Clark County Property Information Building Permit History for properties 213065000, 213066000, 213067000, 213068000,

213069000, 213070000, 213071000, 213072000, 213073000, 213074000, 213075000, 213076000, 213077000, 213078000, 213079000, 213080000, 213081000, 213082000 enclosed in the data CD included with the paper original of Futurewise's Sept. 16, 2015 letter in Appendix A.

For Parcels 213079000 and 213071000, Clark County Development Review Decision and Abbreviated Staff Report Date: March 9, 2005, Case Number: MZR2005-00021 Lot Determination enclosed in the data CD included with the paper original of Futurewise's Sept. 16, 2015 letter Appendix A.

Table 2 Soils Types in the Ridgefield UGA Expansion and Land Capability and Prime Farmland Status

Map Unit Symbol	Map Unit Name	Acres in Area	Percent of Area	Land Capability	Prime Farmland
GeB	Gee silt loam, 0 to 8 percent slopes	70.3	62.6%		3w Prime Farmland
GeD	Gee silt loam, 8 to 20 percent slopes	12.1	10.8%		3e Farmland of statewide importance
GeE	Gee silt loam, 20 to 30 percent slopes	12.8	11.4%		4e
HoA	Hillsboro silt loam, 0 to 3 percent slopes	0.2	0.2%		1 Prime Farmland
HoE	Hillsboro silt loam, 20 to 30 percent slopes	0.3	0.3%		4e
OdB	Odne silt loam, 0 to 5 percent slopes	8.8	7.9%		6w
SIF	Sara silt loam, 30 to 50 percent slopes	0.1	0.1%		7e
W	Water	1.1	1.0%		2e
WgB	Washougal gravelly loam, 0 to 8 percent slopes	6.5	5.8%		Prime Farmland
	Totals	112.2	100.1%		

Percent Land Capability 1 through 4 Soils: 91.1%

Percent Prime Farmland Soils: 68.6%

Sources: United States Department of Agriculture Natural Resources Conservation Service, Web Soil Survey map and map unit descriptions both enclosed with the paper original of this letter.