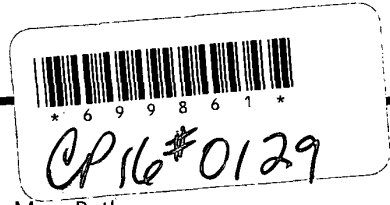


O'Donnell, Mary Beth



*06/05/14
See date
of letter*

From: Tilton, Rebecca
Sent: Wednesday, June 11, 2014 11:20 AM
To: Orjiako, Oliver; McCall, Marilee; O'Donnell, Mary Beth
Subject: Written Testimony re: Comp Plan
Attachments: Comp Plan Written Testimony from 6-10-17 Hearing.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Hi,

Here's written testimony from Carol Levanen, received during the public comment period of our hearing on June 10.

Rebecca

cc'd to = Board
Orjako
McCall
O'Donnell

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

June 5, 2014

Re: Clark County Growth Management Comprehensive Plan resource map

Clark County Citizens United, Inc. represents over 6000 rural Clark County landowners. In our continued research regarding the existing Clark County Comprehensive Land Use Plan we turned to the soils maps which are an integral part of the Plan. These maps were created by the county in 1994 and are used by staff to determine prime and preferred soils, mandated under the GMA, for zoning agriculture and forest resource lands.

36.70.A.050 Guidelines to classify agriculture, forest and mineral lands and critical areas states, *"The department shall consult with the department of agriculture regarding guidelines for agricultural lands, the department of natural resources regarding forest lands...."* **36.70.A.030 Definitions, item (10) states,** *"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."*

The county's prime and preferred soil for agriculture is Hillsboro Loam with it's subsets, and the prime and preferred soil for forest is Cinebar Loam with it's subsets. This information can be confirmed in the **Soil Survey of Clark County, Washington, United States Department of Agriculture Soil Conservations Service, in cooperation with Washington Agricultural Experiment Station, Issued November 1972.** This soils manual is the only credible soils data created for Clark County to date, and no other such document has been created since that time. CCCU, Inc. conducted research to collect data confirming where these prime and preferred soils are located on the maps provided in the manual. There are extreme differences between Clark County's agriculture and forest soils maps, compared to the Soil Survey maps of such soils. The county made a fatal mistake, when it created the existing soils maps in the 1994 Comprehensive Plan.

Serious concerns arise over the credibility of these maps, which have never been changed or challenged because citizens assumed the maps were created by some scientific and legitimate process. Since 1994, these maps have been the primary source for the rural and resource lands designations in the Plan. If these maps are flawed, the whole rural and resource lands element of the plan is flawed, because the county relied on these maps for their information throughout all rural GMA planning, from 1994 until today. Clark County Citizens United, Inc. urge the commissioners to create a new map, showing the correct information, before proceeding with the update of the 2016 GMA Land Use Plan.

Sincerely,



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