

**O'Donnell, Mary Beth**

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CP16#0271

**From:** Tilton, Rebecca  
**Sent:** Wednesday, September 03, 2014 12:20 PM  
**To:** Barnes, Ed; Madore, David; Mielke, Tom, Orjiako, Oliver, O'Donnell, Mary Beth  
**Subject:** Testimony Re. Comp Plan Update  
**Attachments:** Susan Rasmussen comments\_090214.pdf, Carol Levanen comments\_090214.pdf

Hello,

Attached please find written comments submitted by Carol Levanen and Susan Rasmussen during the Board's Hearing of Sept. 2, 2014 (public comment time).

Thank you,  
Rebecca

Rebecca Tilton, Clerk of the Board  
Board of Clark County Commissioners  
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Rec'd 9/2/14 from  
Carol LeVanen - rlt

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

September 2, 2014

**Re: 2007 Comprehensive Land Use Plan Resource Land Maps**

RCW 36.70A requires that certain criteria be used when designating resource lands in a counties Comprehensive Land Use Plan. To aid in those designations, certain language can be found in the Washington Administrative Code (WAC).

**WAC 365-190-040 Process**, item (4) states, *Classification is the first step in implementing RCW 36.70A.170 and requires defining categories to which natural resource lands and critical areas will be assigned. (5) Designation is the second step in implementing RCW 36.70A.170. (8) Counties and cities must involve the public in classifying and designating natural resource lands and critical areas. The process should include: (i) public participation should include, at a minimum, representation participation from the following entities: Landowners;.....*

**WAC 365-190-050 Agriculture resource land (3) (b) (ii)** states, *In determining whether lands are used or capable of being used for agriculture production, counties and cities shall use the land capability classification system of the United States Department of Agriculture Natural Resource Conservation Service as defined in relevant Field Office Technical Guides. These eight classes are incorporated by the United States Department of Agriculture into map units, description published soil surveys and are based on the growing capacity, productivity and soil composition of the land. (c) The land has long term commercial significance for agriculture. In determining this factor counties and cities should consider the following non inclusive criteria as applicable. (i) The classification of prime and unique farmland soils as mapped in the Natural Resource Conservation Service.....*

**According to the Soil Survey of Clark County, Washington published by the United States Department of Agriculture Soil Conservation Service, In cooperation with Washington Agricultural Experiment Station, Issued November 1972, page 47:**

*Capability grouping shows, in a general way, the suitability of soils for most kinds of field crops. The soils are grouped according to the limitations of the soils when used for field crops, the risk of damage when they are used, and the way they respond to treatment. The grouping does not take into account major and generally expensive landforming that would change slope, depth, or other characteristics of the soils; does not take into consideration possible but unlikely major reclamation projects; and does not apply to rice, cranberries, horticultural crops or other crops requiring special management.*

*Those familiar with the capability classification can infer from it much about the behavior of soils when used for other purposes, but this classification is not a substitute for interpretations designed to show suitability and limitations of groups of soils for forest trees or engineering.*

*In the capability system, the kinds of soils are groped at three levels; The capability*

*class, the subclass, and the unit. These are discussed in the following paragraphs.*

***Capability Classes, the broadest groups, are designated by Roman numerals I through VIII. The numerals indicate progressively greater limitations and narrower choices for practical use, defined as follows;***

***Class I soils have few limitations that restrict their use.***

***Class II soils have moderate limitations that reduce the choice of plants or that require moderate conservation practices.***

***Class III soils have severe limitations that reduce the choice of plants, require special conservation practices or both.***

**Class IV, V, VI, VII, and VIII is indicated to have, very severe limitations that make them unsuited to cultivation and restrict their use.**

**Capability Subclasses are soil groups within one class with small letters used to indicate limitations. In Class I there are no subclasses, because this soil has few limitations.**

**Capability Unite I-1 soils are Cloquato and Newberg series, but could not be found in Clark County on the soils maps in the document.**

**Capability Unit I-2, and IIe-1 soils are Hillsboro series. Fertility is moderate to high with possible erosion hazard.**

**Capability Unit IIe-2 soils are Newberg (none found) and Sauvie series. Fertility is high, but the soil has an erosion hazard.**

**Capability Unit IIe-3 is Cinebar silt loam, 3-8% slopes, is the only soil in this unit. Fertility is moderate with erosion hazard. Soil is productive if properly managed.**

**Capability Unit IIe-4 is Hesson and Olympic series. Fertility is moderate and has erosion hazard.**

**Capability Unit IIw-1 is Sauvie and McBee series. Fertility is high but McGee could not be found in the county and Sauvie has erosion hazard.**

**Capability IIw-2 is Semiahmoo and Tisch series, Fertility is low to moderate, and subject to flooding and seasonal wetness which require drainage.**

**The Hillsboro series is located in the lower Southwest-central portion of the county. The Cinebar series is located in the upper North East corner of the county. The Olympic series is located in the lower Southeast portion of the county. The Hesson is located in the upper Northwest corner of the county. The Sauvie series is located in the far Southwest portion of the county.**

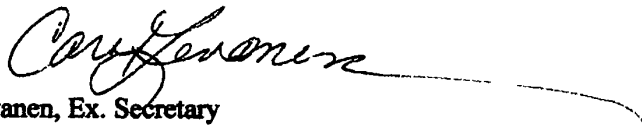
**Clark County Citizens United, Inc. limited the initial research of resource lands soils to Class I for agriculture and Class I-II for forest resource lands. This was done to comply with GMA directives that soil is a primary criteria for resource designations that would have long term commercial significance and be productive. Class III and higher soils have too many limitations to be practical and economically productive for the resource. After creating a large Notebook of Maps, consisting of many past and current GIS maps of soils, resource and land use maps used by Clark County, CCCU, Inc. reviewed them**

all for consistency, accuracy, and application to the agriculture and forest resource designations. When compared, there appears to be no consistency or accuracy in any of the maps reviewed. It also appears that Clark County never used the USDA Soil Survey of Clark County, Washington as a basis for the designation of Prime Class I and II agriculture and forest soils. In addition, no Metadata is present in the record for the current soils maps in the Comprehensive Plan, to confirm what the process was, other than an item called "landuse" that states county staff, aerials, and current use were used.

Of particular interest are current soils maps that are contained in the 2007 Comprehensive Land Use Plan. These maps depict where agriculture and forest soils are located in Clark County and used to determine appropriate zoning for such land, under the GMA, in 1994, 2004, and 2007. The same maps were used in each successive year and are intended to be used in the EIS for the 2016 Comprehensive Plan update. These maps have never changed through the years and have been the basis for resource designations, focus group recommendations and rural studies. In comparing the maps, it can be concluded that ag and forest soils are in the same location in both maps. In addition, there is no consistency with other GIS maps provided by the county from 1990 to 2007. A notation on the Clark County Perspectives 1990 Draft Community Framework Plan map states, *Revised 1990, Note: Extreme care was taken in the compilations and analysis of this map. However, due to the need to rely on several outside sources for information, Clark County, Washington cannot accept any responsibilities for errors, omissions or positional accuracy and therefore there are no warranties which accompany this product.* This map indicates the proposed resource land uses. But, none of the county maps depict Hillsboro Loam Class I soil in any of the zone locations for agriculture zoning, even though they are claimed to be from the same GIS source. The same is true for the Prime I-II Cinebar Loam soil that was determined to be prime forest soil according to numerous forest consultants and the Department of Natural Resources. The forest zones are not consistent with the location of the forest soils.

The only consistency noted on all of the maps is the enormous number of small 2.5 and 5 acre rural lots that were included in the resource zones, but are not conducting the resource. These were created before the 1994 Comprehensive Land Use Plan. Zoning most of these small rural parcels into large lot resource zones, using incorrect maps and inaccurate data, demonstrates a total disregard for the rural history, character, vesting, property rights and lifestyle of the rural communities. The only way to correct this information is to correct the soils maps. These parcels need to be returned to appropriate and accurate zoning, using the proper criteria according to the GMA.

Sincerely,



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

CCID-Board  
Orirako

Rec'd 9-2-14 from Susan Rasmussen



Department & Programs

GIS Home

SIGN IN

*9/2/14  
presented by Susan Rasmussen  
for CCW*

**Land Records**

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**Metadata Information Browser**

Search by layer name, keywords or display layers grouped alphabetically.

Layer Name:  Layer Keyword(s):  Attribute Keyword(s):

limit results: Data Types:

Search

Get 10 Newest Layers

limit results: Layer Name Beginning with:

A B C D E F G H I J K L M N O P Q R S T U V W X Y Z |

**Layer Name: Landuse Layer dbID #:6**

**Overview Summary**

Title: GMA Landuse  
 Layer Name: Landuse  
 Status: Active  
 Library: clark  
 Schema:  
 Dataset:

Description:

Landuse polygons created for 1994 GMA Depicts land uses within Clark County as determined by the Planning Department. It is a combination of the Assessors Landuse (Primary Property Type) and the mapping departments Photo Interpretation.

History:

Assessor's PT1 code was aggregated into approximately 25 land use categories. Parcels > 1 acre were classified using photo-interpretation. Vancouver and Clark County Planning also used limited field surveys to update the database.

Other Links:

Data Type: Arc/Info Coverages  
 Derived From: Self  
 Intended Use:

Growth Management and Land Use Planning The Photo Interpretation coverage is from 1:24000 Aerial Photos, this makes the product unsuitable for display with the parcels coverage.

Intended Scale: 24,000

Metadata Restrictions: No

Data Restrictions: None

Maintenance: Unknown

Keywords: landuse gma growth management

Other Data Types: ShapeFiles

**Technical & Source Data**

Documented: 12-May-93

Image Reference: No

Source Title:

Source Projection: State Plane

Source Description: Assessor's database on the HP3000 as corrected from limited area field surveys by the City of Vancouver, Clark County Planning and photo- interpretation.