Carol Levanen

From: Carol Levanen [mailto:cnkental@yahoo.com]
Sent: Thursday, August 27, 2015 2:14 PM
To: Mielke, Tom; Stewart, Jeanne; Madore, David; Orjiako, Oliver
Subject: Prime Resource Soils in the DSEIS - For the Public Record

August 27, 2015

Clark County Board of Councilors
P.O. Box 5000
Vancouver, Washington 98686

Dear Councilors,

CCCU is carefully reviewing the colored maps to the DSEIS, and we are shocked over what we are seeing. Does this ESA company know what they are doing? The DSEIS text is so vague that, until one goes to the maps, one does not understand the impact of the changes. The Councilors need to scrub the data and demand scientific evidence to support the agriculture, forest and septic maps. Specifically on page 8 of the NRCS soils manual it states, "Cinebar Series - These soils occur in the northeastern part of the county on hilly uplands and old terraces, which are dissected by many creeks and drainageways. The native vegetation is a heavy growth of Douglas fir ..." Cinebar soils are among the highest producing timber soils in Clark County. "Most of this soil is used for Douglas fir." "This soil is used for Douglas fir." On the EIS maps, they designate the Cinebar soils as poor forest soils, which clearly demonstrate that the GMA requirement to use the NRCS Soil Manual was ignored. In the production charts of the Manual, one will see that the production capability of the prime soils of Hillsboro Loam for agriculture and Cinebar Loam for forest, is twice the production as the other soils. Yet, the county maps have those soils indicated as poor soil for the resource. In addition, the production rates in the NRCS Manual for soils, show that what the county indicates as prime soils for both agriculture and forest, is actually very low throughout the maps. The GMA intended that prime soil be used because the production rates are so much higher than other soils, and often as much a twice as high. The GMA mandates that preservation of resource land is for the purpose of making money well into the future. That is why it says that prime soil is to be determined first, as one cannot expect to be productive and make money in the resource, unless there is a good foundation for the crops. This is of most importance to any farmer or forester, because they want to make money on the land. Before they buy land for the resource, they first look at the soil. This basic concept is what the GMA bases resource designations on. In reality, all soil can grow something, because that is what it does, but to call it something different than what it is and what the GMA has mandated in a Comprehensive Plan, is illegal.

Sincerely,

Carol Levanen, Ex. Secretary
Clark County Citizens United, Inc.
P.O. Box 5000
Battle Ground, Washington 98604