

Schroader, Kathy



From: Tim Trohimovich <Tim@futurewise.org>
Sent: Monday, May 23, 2016 5:51 PM
To: Cnty Board of County Councilors General Delivery, Cnty 2016 Comp Plan
Subject: Comments on La Center UGA expansion as part of the Clark County Comprehensive Plan 2016 Update
Attachments: Futurewise Comments on La Center UGA Expansion May 23, 2016.pdf

Dear Sirs and Madams

Enclosed please find Futurewise's comments on the La Center urban growth area expansion as part of the Clark County Comprehensive Plan 2016 Update. We have also mailed the paper originals with the referenced enclosures. Please contact me if you require anything else.

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May 23, 2016

The Honorable Marc Boldt, Council Chair
Clark County Board of County Councilors
PO Box 5000
Vancouver, Washington 98666-5000

Mr Steve Morasch, Chair
Clark County Planning Commission
Clark County Community Planning
Attn 2016 Comp Plan Record
PO Box 9810
Vancouver, Washington 98666-9810

Dear Council Chair Boldt, Councilors Madore, Mielke, Olson, and Stewart, Planning Commission Chair Morasch and Planning Commissioners Wright, Blom, Quiring, Barca, Johnson, and Bender

Subject: Comments on the La Center urban growth area expansion as part of the Clark County Comprehensive Plan 2016 Update.

Sent via U S Mail and email to boardcom@clark.wa.gov, comp.plan@clark.wa.gov

Thank you again for the opportunity to comment on the Clark County Comprehensive Plan Update. In Futurewise's May 18, 2016, comment letter on the Preferred Alternative we expressed concern about including the La Center urban growth area expansion in the comprehensive plan update because it is unneeded and the land continues to qualify as agricultural land of long-term commercial significance. This letter will amplify those concerns and show that the urban growth area (UGA) expansion violates the Growth Management Act (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 La Center 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 La Center 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 the existing urban growth areas have a surplus of land needed to accommodate the county's adopted employment target.¹ So the UGA expansion is unneeded.

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

¹ *Clark County Buildable Lands Report* p 11 & p 14 (June 2015) accessed on May 23, 2016 at https://www.clark.wa.gov/sites/all/files/the-grid/061015NWS_2015BUILDABLE_LANDS_REPORT.pdf and cited pages enclosed with the paper original of this letter.

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.

The La Center urban growth area expansion violates the GMA because the agricultural comprehensive plan 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:

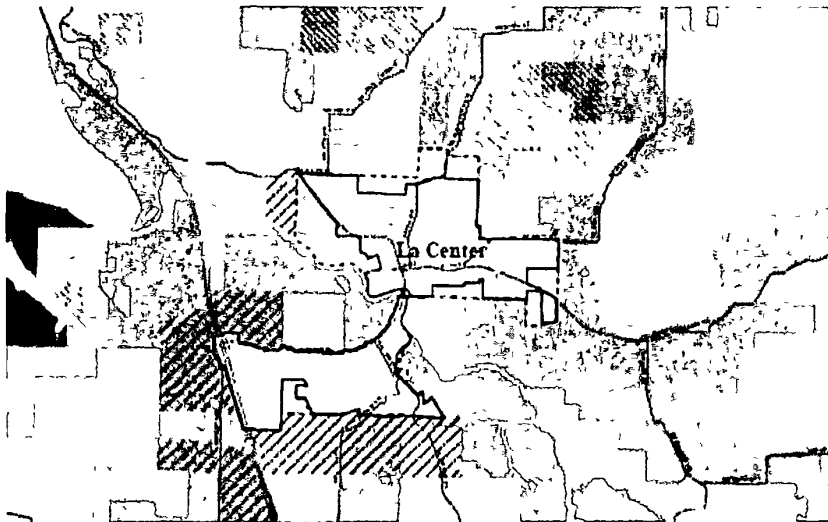
The Board considers Benton County's de-designation of agricultural lands for this small section of land, in isolation from a much larger County or area-wide study to be inappropriate and, by de-designating lands that qualify as agricultural lands of long term commercial significance, the County violated 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 56.66 acres that is proposed to be dedesignated and included in the La Center 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 the existing part of La Center at the interchange north and west. So just considering the dedesignation on the 56.66 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.

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	Managing Inside CRGSA	
Mixed Use	Park Open Space	Rural Center Mixed Use	
Industrial	Forest Tier 1		
Heavy Industrial	Forest Tier 2		
Public Facility	Airport		
Bonnetville Power Administration	Urban Reserve		
RURAL RESOURCE	Water		
Rural 5			

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.gmhbw.wa.gov/LoadDocument.aspx?docid=3658>

³ *Id.* at 35 of 38.



Source *County/UGA Comprehensive Plan Clark County, Washington* accessed on May 23, 2016, 2015 at http://www.legacy.clark.wa.gov/planning/comp_plan/documents/AmendComplan_2013.pdf

In addition, the La Center UGA expansion was part of LB-1 which the court of appeals found was improperly de-designated in 2007 and improperly incorporated into the La Center UGA⁴

The La Center 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 areas⁵ 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

⁴ *Clark Cty Washington v W Washington Growth Mgmt Hearings Review Bd*, 161 Wn App 204, 238, 254 P 3d 862, 878 (2011), *vacated in part Clark Cty v W Washington Growth Mgmt Hearings Review Bd*, 177 Wn 2d 136, 298 P 3d 704 (2013), this part of the decision was not vacated, *Comprehensive Growth Management Plan La Center UGA – Map 1 Deliberation Components & Comprehensive Growth Management Plan La Center UGA – Map 2 Deliberation Components* both included with Futurewise’s May 18, 2016, letter on the Preferred Alternative

⁵ *Bremerton v Kitsap County*, CPSGMHB No 95-3-0039, Final Decision and Order (Oct 6, 1995), at 28

resource lands to other uses or allowing incompatible uses nearby impairs the viability of the resource industry”⁶

Natural resource lands must be conserved⁷ 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 uses⁸

⁶ Clark County designated the area proposed for the La Center UGA expansion as agricultural lands of long-term commercial significance⁹ 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 conserved¹⁰ 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

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 growth¹¹ None of the 56 66 acres are characterized by urban growth¹² Except for the convenience store and gas station at the northeast intersection of NW Paradise Park Road

⁶ *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)

⁷ RCW 36 70A 060

⁸ *Lewis County v Western Washington Growth Management Hearings Bd*, 157 Wn 2d 488, 502, 139 P 3d 1096, 1103 (2006)

⁹ See the *County/UGA Comprehensive Plan Clark County, Washington* excerpt on page 3 of this letter

¹⁰ *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.clk.wa.gov/Planning/comp_plan/documents/WcbVersion_AmORD2012-12-20.pdf

¹¹ *Lewis County v Western Washington Growth Management Hearings Bd*, 157 Wn 2d 488, 502, 139 P 3d 1096, 1103 (2006)

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 aeriels showing parcels, the Clark County Property Information Account Summary, and the Clark County Property Information Land & Building Details for properties 209705000, 209748000, 209746000, 209738000, 986028840, 209749000, 209699000, 986027200, 209694000, 209735000, 209712000, 209728000, 209711000, 209730000, 211260000, 211264000, 211215000, 209708000, and 209703000, and selected permits all included in Appendix A on the enclosed data CD in directory “Appendix A Real Property Info ”

and NW La Center Road (parcel 209738000) and the school bus facility (parcel 209699000), neither are any of the adjoining lots in La Center or any of the nearby agricultural and rural lots¹³

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”¹⁴ 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 La Center 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 56 66 acres and many of the properties in the vicinity are currently farmed In addition, as Table 1 enclosed with this letter documents, the 44 1 acres are in the agriculture current use taxation program, so the property is used for agriculture

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”¹⁵ As the soil map and soil descriptions enclosed with this letter documents, over 97 3 percent of the expansion area has Land Capability 1 through 4 soils These are agriculturally productive soils¹⁶ Most of the nearby lands also have these high quality agricultural soils¹⁷

¹³ 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, Table 1 Summary Property Data for Properties in and Adjoining the La Connor Urban Growth Area Expansion enclosed with this letter, and 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 the directory “Appendix A Real Property Info” There is urban development, the school bus facility, on parcel 209699000 but it is separated from the proposed UGA expansion by the narrow part of parcel 209749000

¹⁴ *Lewis County*, 157 Wn 2d at 502, 139 P 3d at 1103

¹⁵ *Lewis County*, 157 Wn 2d at 502, 139 P 3d at 1103

¹⁶ USDA Natural Resources Conservation Service Minnesota, *Land Capability Classes* webpage p 1 accessed on May 23, 2016 at

http://www.nrcs.usda.gov/xvps/portal/nrcs/detail/mn/technical/dma/mu/?cid=ncsl+2p2_023556 and enclosed with the paper original of this letter

¹⁷ July 5 2007 & August 14 2007 BOCC Tentative Land Use Map Agricultural Analysis Deliberation and Decision p 2 (10/9/2007) enclosed with the paper original of Futurewise’s May 18, 2016, letter on the Preferred Alternative

In addition, Table 2 also documents that 44 percent of the UGA expansion has prime farmland. Another 29 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 time, and they either do not flood frequently or are protected from flooding.¹⁸

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.¹⁹

So the soils, growing capacity, and productivity show this area has long-term commercial significance. According to data we obtained from the Clark County "Building Permit History" webpages, there have not been any urban development permits on the UGA expansion.²⁰ The only urban development permits nearby were for the convenience store gas station on parcel 209738000 and the school bus facility on parcel 209699000 including adjacent parcels in La Center.²¹ So these 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."²² And the *Clark County Buildable Lands Report* documents that La

¹⁸ 7 CFR § 657.5(a)(1)

¹⁹ *Clark County 20-Year Comprehensive Growth Management Plan 2004-2024* Chapter 3 Rural and Natural Resource Element p. 3-8 (Dec. 2012)

²⁰ Table 1 Summary Property Data for Properties in and Adjoining the La Connor Urban Growth Area Expansion enclosed with this letter.

²¹ *Id.* and "Building Permit History" webpages enclosed in the data CD included with the paper original of this letter in the directory "Appendix A Real Property Info." 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.

²² *Soccer Fields*, 142 Wn 2d at 556, 14 P 3d at 140 emphasis in original.

Center has no need to expand its UGA to accommodate commercial growth²³ 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 lands²⁴ Those factors show the land in the UGA expansion still qualifies as agricultural lands of long-term commercial significance

"The availability of public facilities"

Neither La Center nor any other public facility provider has water or sewer facilities to serve any of the UGA expansion or its vicinity²⁵ No other place-based urban public facilities serve the UGA expansion area²⁶ So this criterion shows the area has long-term commercial significance for agriculture

"Tax status"

In UGA expansion, 44 1 acres of the 56 66 acres, 78 percent, is in the agriculture current use taxation program, so the property is used for agriculture and many neighboring parcels are in the agriculture current use taxation program²⁷ 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 vicinity²⁸ 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 La Center, most of the area is separated from the urban growth area by a road, is currently outside of the UGA, and designated as agricultural lands of long-term commercial significance²⁹ Except for the convenience store and gas station, there is

²³ *Clark County Buildable Lands Report* p 11 (June 2015)

²⁴ *Clark County 20-Year Comprehensive Growth Management Plan 2004-2024* Chapter 3 Rural and Natural Resource Element p 3-7 (Dec 2012)

²⁵ City of La Center, Washington, *La Center Junction Subarea Plan* pp 3-7 – 3-8 & p 3-13 (2010) accessed on May 23, 2016 at

http://www.clackcenter.wa.us/city_departments/pdfs/1_d%20Center%20Junction%20Subarea%20Plan%20%205.pdf and cited pages enclosed with the paper original of this letter

²⁶ *Id* at pp 3-6 – 3-10

²⁷ Table 1 Summary Property Data for Properties in and Adjoining the La Connor Urban Growth Area Expansion, July 5 2007 & August 14 2007 BOCC Tentative Land Use Map Agricultural Analysis Deliberation and Decision p 2 (10/9/2007)

²⁸ City of La Center, Washington, *La Center Junction Subarea Plan* pp 3-6 – 3-9 & p 3-13 (2010)

²⁹ Clark County MapsOnline Property and Land Records Information map showing tax lots and building footprints enclosed with the paper original of this letter

currently no urban development on the UGA expansion or immediately south in La Center except for the combination convenience store and gas station³⁰ As was documented above, there are no urban serving public facilities or services available to the UGA expansion *Clark County Buildable Lands Report* shows there is no need to expand the La Center UGA for commercial uses as is proposed here³¹ 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”

As Table 1 documents, the UGA expansion has a 24.1-acre lot, a 12.45-acre lot, and a 20-acre lot The 24.1 and 20 acre lot have a common owner³² Farms are often composed of multiple parcels of land³³ So the 44.1 acres is larger than Clark County’s average farm size of 39 acres³⁴ 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 La Center, with only two exceptions consist of agriculture and rural uses³⁵ And most of La Center is across the road from the UGA expansion³⁶ So the land settlement patterns are generally compatible with agriculture and the area has long-term commercial significance for agriculture

³⁰ Google Earth April 17, 2015 image of the UGA expansion vicinity enclosed with the paper original of 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

³¹ *Clark County Buildable Lands Report* p. 1 & p. 14 (June 2015)

³² Table 1 Summary Property Data for Properties in and Adjoining the La Connor Urban Growth Area Expansion

³³ 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.nacensus.usda.gov/Publications/2012/Full_Report/Volume_1_Chapter_2_County_Level/Washington/wa1.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

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 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)

³⁵ 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

³⁶ Clark County MapsOnline Property and Land Records Information map showing tax lots and building footprints

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“Intensity of nearby land uses”

Again, the uses near the proposed UGA expansion, including land in La Center, with two exceptions consist of agriculture and rural type uses³⁷ And most of La Center is across the road from the UGA expansion³⁸ So the intensity of nearby land uses are generally compatible with agriculture and the area has long-term commercial significance for agriculture

“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 on the UGA expansion³⁹ The only urban development permits nearby were for the convenience store gas station on parcel 209738000 and the school bus facility on parcel 209699000 including adjacent parcels in La Center⁴⁰ 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 land⁴¹ In the present case, there are numerous parcels that could be included in the La Center UGA without converting the agricultural land The excerpt from the comprehensive plan map on page 3 of this letter shows rural land abutting the La Center UGA In addition, there is no need to expand the La Center UGA for commercial development indeed, most of the land in the La Center UGA across from the UGA expansion is zoned commercial and vacant⁴² So land prices should not be the steering factor in the UGA expansion decision

“Proximity to markets”

This area is close to La Center and has good access to I-5⁴³ 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

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

³⁸ Clark County MapsOnline Property and Land Records Information map showing tax lots and building footprints

³⁹ Table 1 Summary Property Data for Properties in and Adjoining the La Connor Urban Growth Area Expansion enclosed with this letter

⁴⁰ *Id* and “Building Permit History” webpages in the directory “Appendix A Real Property Info” 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

⁴¹ *City of Redmond*, 136 Wn 2d at 52 – 53, 959 P 2d at 1097

⁴² *Clark County Buildable Lands Report* p 11 (June 2015), Table 1 Summary Property Data for Properties in and Adjoining the La Connor Urban Growth Area Expansion

⁴³ Google Earth April 17, 2015 image of the UGA expansion vicinity

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farmers do sell their products at local markets⁴⁴ The two major poultry processors are in Western Washington,⁴⁵ 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 markets⁴⁶ So this criterion shows the area has long-term commercial significance

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

Conclusion

As we have seen, the proposed La Center UGA expansion violates the GMA in three different and independent ways So we recommend it not be adopted

Some may argue that the paving over of 56 66 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 provides⁴⁷ 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

⁴⁴ 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/finil_ag_analysis_prelim_report.pdf and cited pages enclosed with the paper original of this letter

⁴⁵ *Id* at p 24

⁴⁶ 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.sta.wsu.edu/research/reports/pdf/rpt_12_livestock.pdf and enclosed with the paper original of Futurewise's Comments on the Draft Supplemental Environmental Impact Statement for the Clark County 2016 Comprehensive Growth Management Plan Update relating the Ridgefield urban growth area expansion (Sept 16, 2015)

⁴⁷ Washington State Department of Agriculture, *Washington Agriculture Strategic Plan 2020 and Beyond* pp 50 – 52 (2009) accessed on Oct 16, 2015 at <http://agr.wa.gov/101/> 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

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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 and Adjoining the La Connor Urban Growth Area Expansion

Property Identification Number	Owner & Mailing Address	Sale Date	In Agricultural Current Use Taxation Program	Buildings	Permits	Zone	Parcel Size (Acres)
In the UGA Expansion							
209705000	FUDGE LINDA L & COWAN MELODY ET AL TRUSTEES C/O GRIFFITH TRUST PO BOX 180 LACENTER WA, 98629 US		Yes The Land is valued as Farm and Agricultural Land	House farm buildings and communications tower	Permits for communication tower various years	AG-20	24.1
209746000	3B NW LLC 7320 NE SAINT JOHNS VANCOUVER WA, 98665	10/31/1997	Regular	None	None	AG-20	12.45
209748000	FUDGE LINDA L & COWAN MELODY ET AL TRUSTEES C/O GRIFFITH TRUST PO BOX 180 LACENTER WA 98629 US		Yes The Land is valued as Farm and Agricultural Land	House and accessory structures	Right of Way/Road Cut and Single-family home 2006	AG-20	20
Adjoining Properties Outside the UGA Expansion							
209738000	MINIT MANAGEMENT LLC PO BOX 5889	10/20/2006	No Regular	Convenience store, restaurant, fueling islands	Various commercial permits	C-2 La Center zoning	4.22

Property Identification Number	Owner & Mailing Address	Sale Date	In Agricultural Current Use Taxation Program	Buildings	Permits	Zone	Parcel Size (Acres)
	VANCOUVER WA, 98668 US						
986028840	CLARK PUB UTIL DIST #1 PO BOX 8900 VANCOUVER WA, 98668 US	10/27/2010	No Total Exemption	None	Various permits for well field	AG-20	1.98
209749000	PARADISE LACENTER LLC PO BOX 1424 KALAMA WA 98625 US	10/25/2010	Yes The Land is valued as Farm and Agricultural Land	Home	Permits listed for this property are for the school bus facility on Parcel 209699000	AG-20	18.43
209699000	KWRL TRANSPORTATION COOPERATIVE 989 FRAZIER LN WOODLAND WA, 98674 US	09/12/2013	No Total Exemption	Public agency office and school bus parking area	Permits for the school bus facility	AG-20	19
986027200	CLARK PUBLIC UTILITIES PO BOX 8900 VANCOUVER WA 98668 US	10/29/2008	No Total Exemption	None	Permit for electrical substation	AG-20	5
209694000	HOLMES BARBARA C TRUSTEE	02/05/2013	No but land is valued as Timber Land	None	None	AG-20	15

Property Identification Number	Owner & Mailing Address	Sale Date	In Agricultural Current Use Taxation Program	Buildings	Permits	Zone	Parcel Size (Acres)
	3111 SE 154TH AVE VANCOUVER WA, 98683						
209735000	FRANK GILLESPIE LLC 32303 NW 18TH AVE RIDGEFIELD WA, 98642 US	07/21/2014	No Regular	While some pages have a picture of a house all other records show no buildings The picture appears to be the house on parcel 209713000	None	R-5	5 08
209712000	GILLESPIE FRANK LLC 32303 NW 18TH AVE RIDGEFIELD WA, 98642	04/03/2009	No Regular	House	Permits for house	R-5	5 08
209728000	SAING CHENG & SAING SOBOTH TRUSTEES 341 SILVER MAPLE RD GROVELAND FL 34736	04/30/2009	No Regular	None	None	R-5	5 07
209711000	KODA CHESTER A & KODA TINA M	04/22/2004	No Regular	House	Mobile Home Placement Permit then a	R-5	5 07

Property Identification Number	Owner & Mailing Address	Sale Date	In Agricultural Current Use Taxation Program	Buildings	Permits	Zone	Parcel Size (Acres)
	PO BOX 881 LACENTER WA , 98629 US				permit for an onsite constructed house		
209730000	ROBESON ROBERT E & ROBESON LARAINNE K 32013 NW 18TH AVE RIDGEFIELD WA, 98642	04/24/2013	No Regular	House		R-5	5 01
211260000	SANDHU DIAL & SANDHU JASWANT 1803 NW LACENTER RD RIDGEFIELD WA , 98642 US	05/21/2008	No Regular	House and accessory buildings	House permits	LDR-7 5 La Center Zoning	5 53
211264000	CIRCLE C CORP 873 S HILLHURST RD RIDGEFIELD WA, 98642 US		No Regular	None	No development permits	C-2 La Center Zoning	6 29
211215000	CARLSON INVESTMENTS LLC CARLSON CORAMAE 873 S HILL HURST RD	11/21/2003	No Regular	None	No development permits	C-2 La Center Zoning	16 12

Property Identification Number	Owner & Mailing Address	Sale Date	In Agricultural Current Use Taxation Program	Buildings	Permits	Zone	Parcel Size (Acres)
	RIDGEFIELD WA, 98642 US						
209708000	VANVESSEM JOHN & VANVESSEM SHANNA 14900 NW 15TH AVE VANCOUVER WA, 98685 US		No Regular	None	No development permits since a 2007 grading permit	C-2 La Center Zoning	2.48
209703000	INTERCHANGE DEVELOPMENT GROUP LLC 1 MOHEGAN SUN BLVD UNICASVILLE CT, 06382	11/20/2015	No Regular	None	No permits other than a 2008 zoning review	C-2 La Center Zoning	1.19

Sources: Clark County Property Information Account Summary, Clark County Property Information Land & Building Details and Clark County Property Information Building Permit History for properties 209705000, 209748000, 209746000, 209738000, 986028840, 209749000, 209699000, 986027200, 209694000, 209735000, 209712000, 209728000, 209711000, 209730000, 211260000, 211264000, 211215000, 209708000, and 209703000 and selected permits all included in Appendix A on the enclosed data CD in directory "Appendix A Real Property Info."