

Court of Appeals No. 39546-1-II

COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION TWO

CLARK COUNTY, CITY OF LaCENTER, GM CAMAS, LLC,
MacDONALD LIVING TRUST and RENAISSANCE HOMES,

Respondents,

v.

WESTERN WASHINGTON GROWTH MANAGEMENT HEARINGS
BOARD, JOHN KARPINSKI, CLARK COUNTY NATURAL
RESOURCES COUNSEL and FUTUREWISE,

Appellants.

BRIEF OF RESPONDENT MacDONALD LIVING TRUST

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I. INTRODUCTION

Respondent MacDonald Living Trust (“MacDonald”) respectfully requests the Court of Appeals affirm the trial court’s Order dated June 12, 2009 that reversed the June 3, 2008 Amended Final Decision and Order (“AFDO”) issued by the Western Washington Growth Management Hearings Board (“Growth Board”) regarding Case No. 07-2-0027.

Despite substantial evidence to the contrary, the Growth Board determined that in passing Ordinance 2007-09-13, Clark County committed “clear error” when it determined that MacDonald’s Property did not satisfy the applicable criteria necessary to be designated agricultural land under the Growth Management Act (“GMA”) and expanding the Washougal Urban Growth Area. The Growth Board’s decision, with respect to MacDonald, was in error and was properly reversed by the trial court.

MacDonald hereby adopts by reference the briefing submitted by Clark County, and the other respondents, pursuant to RAP 10.1(g).

II. STATEMENT OF THE CASE

MacDonald owns real property in Clark County, Washington which lies within the sub-area referred to in the record as “WB”. Exhibit 6605. The entire sub-area consists of approximately 116 acres. *Id.* The MacDonald Property consists of approximately 79 acres and is located at the southeast corner of the intersection of SE 352nd Avenue and 20th Street in Washougal, Washington, Tax Parcel Number 129825-000. *Id.*

In passing Ordinance 2007-09-13, Clark County determined that the MacDonald Property **did not** satisfy the GMA mandated requirements necessary to be designated agricultural land because the Property did not meet the three-part conjunctive test for agricultural lands of long-term commercial significance as set forth by the *Lewis County* decision. Exhibits 6605 and 6512. As such, the County changed the MacDonald Property's comprehensive plan designation to a non-agricultural designation. The County also determined that the property was appropriate to add to the Washougal Urban Growth Area because it was adjacent to territory characterized by urban growth. *Id.*

John Karpinski, Clark County Natural Resource Counsel, and Futurewise challenged the County's environmental review, the County's Determination¹ and the addition of this land into the Washougal Urban Growth Area to the Growth Board. The Growth Board issued its AFDO June 3, 2008 which erroneously held, in part, that Clark County's Determination with respect to the MacDonald Property was inconsistent with the Washington State Growth Management Act (RCW 36.70A); and that such action was invalid, as was the inclusion of this land into the Washougal Urban Growth Area.

Clark County Superior Court Judge Robert Harris properly reversed the Growth Board's AFDO as it pertains to the MacDonald

¹ The phrase "the County's Determination" or word "Determination" will hereafter refer to the County's conclusion that certain land did not meet the three-part conjunctive test for agricultural land of long-term commercial significance as set forth by the *Lewis County* decision. *Lewis County v. W. Wash. Growth Mgmt. Hearings Bd.*, 157 Wash. 2d 488, 139 P.3d 1096 (2006).

Property. See Memorandum of Decision and Order. The Judge's Memorandum of Decision provided a number of factors supporting reversal of the Growth Board's AFDO including, but not limited to (1) the properties adjacency to existing urban growth boundaries; (2) the Growth Board's overemphasis on soil types and the failure of the Growth Board to give proper weight to the Globalwise report; and (3) there was substantial evidence in the record establishing that the MacDonald property did not meet the third prong of the *Lewis County* test – "long term commercial significance." Indeed, the trial court stated as follows:

The third factor of long-term commercial significance is perhaps the key area in which the Board failed to give deference to the Board of County Commissioners in their adoption. *Lewis County*, supra. The Mt. Norway site, which is part of the Washougal growth management, has **never** been a productive farming area. Washougal having its easterly boundary subject to the Columbia River Gorge zoning requirements basically limits anything that may detract from the scenic development of the gorge. That limitation has been so designated by Congress as it placed controls requiring a common agreement of the States of Washington and Oregon regarding any development that may be allowed within that regulated area. Therefore, the North development of the Mt. Norway site is the only location for Washougal's growth as the Camas growth management area is a buffer to the West limiting any further expansion.

Memorandum of Decision, p. 6.

III. ARGUMENT

A. PRESUMPTIONS AND DEFERENCE TO CLARK COUNTY

The Revised Code of Washington presumes that a county's Comprehensive Plan is valid upon adoption. RCW 36.70A.320(1). The Growth Board must “ ‘grant deference to counties and cities in how they plan for growth, consistent with the requirements and goals of’ the GMA.” *Lewis County v. Western Washington Growth Management Hearings Board*, 157 Wn.2d 488, 498, 139 P.3d 1096 (2006). The role of the Growth Board is to determine compliance. *Vines v. Jefferson County*, WWGMHB No. 98-2-0018 (April 5, 1999). Local governments are afforded a “broad range of discretion” in determining a methodology for compliance. *Id.*

The parties disagree when deference is owed to the County's Determination regarding the MacDonald Property. In *Quadrant Corporation v. Central Puget Sound Growth Management Hearings Board*, 154 Wash.2d 224, 233, 110 P.3d 1132 (2005), the Washington Supreme Court granted deference to the agency's interpretation of the law in cases where the agency had a specialized expertise in the subject area, but also determined that the courts were not bound by the agency's interpretation of a statute. *Id.*

Specifically, in *Quadrant Corp.*, the Supreme Court held that “deference to county planning actions, that are consistent with the goals and requirements of the GMA, **supersedes** deference granted by the APA and courts to administrative bodies in general.” *Quadrant Corp.*, 154

Wash. 2d at 238, 110 P.3d 1132 (Emphasis added). See RCW 36.70A.3201. The Court also held that while “this deference ends when it is shown that a county’s actions are in fact a ‘clearly erroneous’ application of the GMA, we should give effect to the legislature’s explicitly stated intent to grant deference to county planning decisions.” *Id.*

B. STANDARD OF REVIEW

Growth Management Hearing Boards are charged with adjudicating GMA compliance and, when required, invalidating noncompliant plans and regulations. RCW 36.70A.280. Significantly, these Growth Boards **must** find compliance unless they determine a county action is “clearly erroneous in view of the **entire record** before the board and in light of the goals and requirements of [the GMA].” RCW 36.70A.320(3). (Emphasis added) An action is “clearly erroneous” if the Growth Board has a “firm and definite conviction that a mistake has been committed.” *Dep't of Ecology v. Pub. Util. Dist. No. 1 of Jefferson County*, 121 Wash.2d 179, 201, 849 P.2d 646 (1993).

On appeal, the Court of Appeals reviews the Growth Board’s decision, not the superior court decision affirming it. *King County v. Cent. Puget Sound Growth Mgmt. Hearings Bd.*, 142 Wash.2d 543, 553, 14 P.3d 133 (2000). The Court of Appeals applies the standards of RCW 34.05 directly to the record before the agency, sitting in the same position as the

superior court.” *Id.* (quoting *City of Redmond v. Central Puget Sound Growth Mgmt. Hearings Bd.*, 136 Wash.2d 38, 45, 959 P.2d 1091 (1998)).

Under the judicial review provision of the APA, the “burden of demonstrating the invalidity of [the Board’s decision] is on the party asserting the invalidity”. RCW 34.05.570(1)(a). The validity of that decision is determined in accordance with the standards of review provided in RCW 34.05.570. RCW 34.05.570(3) sets forth nine bases for granting relief from the Board’s decision. Appellants’ sole basis for review in this case is RCW 34.05.570(3)(e). *See* Appellant’s Opening Brief, page 4. RCW 34.05.570(3)(e) provides as follows: The court shall grant relief from an agency order in an adjudicative proceeding only if it determines that the order is not supported by **evidence** that is **substantial** when viewed in light of the whole record before the court, which includes the agency record for judicial review, supplemented by any additional evidence received by the court under this chapter.”

Challenges to the evidence supporting the agency’s order are reviewed for substantial evidence. Substantial evidence exists when a sufficient quantity of evidence exists to persuade a fair-minded person of the truth or correctness of the agency’s order. *Thurston County v. Cooper Point Ass’n*, 148 Wash.2d 1, 8, 57 P.3d 1156 (2002). MacDonald asserts that there was not substantial evidence in the record upon which the Growth Board could conclude that the County’s Determination and expanding the Washougal Urban Growth Area, was clearly erroneous.

Here, the Growth Board was required to find the County's action in compliance **unless** the Growth Board found substantial evidence in the record that the County's action was clearly erroneous in view of the entire record, and in light of the Legislature's clearly stated intent to grant deference to County planning decisions. RCW 36.70A.320(3). Based on the substantial evidence in the record that supports the County's action, and the lack of any probative or contradictory evidence in the record, this Court should find that the Growth Board erred in concluding the actions of the County were clearly erroneous.

Appellants have not met their burden of proof under this standard of review.

C. **SUBSTANTIAL EVIDENCE IN THE RECORD ON REVIEW**

Clark County went to great lengths in making its Determination regarding the MacDonald Property, the other properties, and the alteration of the County's Urban Growth Areas ("UGAs"). The record certified to the trial court was 3222 pages in length and reflects a reasoned, thorough and exhaustive process by Clark County, which ultimately culminated in the passage of Ordinance 2007-09-13. This extensive consideration and process belies Appellants' assertion that the County's process was summary and insufficient. Some of the more relevant evidence contained within the record pertaining to the MacDonald Property is outlined below.

1. MacDonald Submitted Materials In Support Of The Application To Include Its Land In The Washougal UGA

MacDonald submitted a number of exhibits into the record that support the County's findings, particularly as applicable to the MacDonald Property.

On October 2, 2006, MacDonald's DEIS comments were submitted identifying site specific information and analysis relating to the various environmental factors identified in the Draft EIS.² These materials also contained factual information and analysis demonstrating the appropriateness of each property's inclusion in the Urban Growth Area.³

Also submitted to the County, early in the process, was a 15-page analysis prepared by agri-economist Bruce Prenguber of Globalwise, Inc. titled "Agricultural Land Suitability for the MacDonald – Washougal Property", dated September 22, 2006.⁴ This detailed report analyzed the specific criteria in WAC 365-190-050 that must be satisfied to have land designated as agricultural land under the GMA and provides property specific facts relating to each criteria.⁵ This criteria included considerations of proximity to urban areas, potential for higher use, the absence of commercial agriculture, a detailed history of development in the area and other factors related to the WAC criteria. *See* Exhibit 5837.

² *See* Exhibit 5837.

³ *Id.*

⁴ *Id.*

⁵ *Id.*

2. Clark County Staff Provided Detailed And Proper Justification For The Washougal UGA.

Clark County Staff was also diligent in preparing materials concerning agricultural land in Clark County. Staff prepared a Community Planning Staff Report titled “Analysis: Bringing Resource Lands into UGAs May 21, 2007.” This Staff Report provided detailed factual and legal analysis on how, and under what circumstances, Counties in Washington State, may bring agricultural lands into UGAs. *See* Exhibit 6548.

The 63-page report from Globalwise, Inc., dated April 16, 2007 titled “Analysis of the Agricultural Economic Trends and Conditions in Clark County, Washington” is another example of the level of investigation and thorough analysis conducted by Clark County. *See* Exhibit 6548. The Globalwise report was comprehensive in nature and included a historical look at Clark County’s farming practices, economic trends in Clark County agriculture, current conditions in agriculture, interviews with farmers and individuals with knowledge of the agricultural industry, tables, graphs and photographs, as well as reasoned conclusions on whether each sub-area met the express GMA test for being designated as agricultural land.

County Staff also prepared a detailed and substantive “Issue Paper” concerning agricultural lands,⁶ which specifically addressed Washougal-related issues. The Issue Paper provided a detailed

⁶ Exhibit 6605, “Issue Papers 1-13 distribution cover sheet with attachments for August 8, 2006 BOCC worksession,” 08/03/07.

background of the 20-year Comprehensive Growth Management Plan for Clark County, described in detail the proper test in Washington for determining what is, and what is not, agricultural land and identified the factual and legal justification for its decision that this property did not meet that test. The Issue Paper specifically referenced Washougal as follows:

Washougal

For the Washougal UGA, the Board concluded that 369.71 acres should be de-designated from agriculture and brought into the UGA as Residential and Employment land. Neither of the two sub-areas was identified as primarily devoted to the commercial production of agricultural products. It was determined that sub-area WA did not have long term commercial significance because of the close proximity to urban areas and the fact that parts of the area were already within Urban Reserve overlays. Sub-area *WB* has good agricultural soils and low critical land, but has no access to water. It was determined that both these sub-areas would serve a higher purpose as employment land, which would create more jobs, increase the tax base for the City and benefit the School District.⁷

The Commissioners were deliberate in their decisions and the evidence in the record supports the Commissioners' express findings that this Property was not "primarily devoted to" agriculture and that the Property did not have long-term commercial significance.

County Staff prepared a comprehensive "matrix" of the relevant factual and legal criteria for the County's Determination with respect to agricultural lands as well.⁸ This matrix provided a comprehensive look by

⁷ *Id.* at 3 of 5.

⁸ Exhibit 6605, Matrix.

sub-area as to whether the land was characterized by urban growth, whether the land was devoted to commercial production of agricultural products or capable of being used for production as well as whether the individual areas had long-term commercial significance for agricultural production.

3. The County Commissioners' Findings

In approving the UGA expansion for the City of Washougal, the Board of County Commissioners made the following specific finding:

18. Agricultural lands

The Board finds de-designating of lands designated as "Agriculture" and their inclusion in urban growth areas to be appropriate, as follows:

...

Washougal UGA. About 370 acres are de-designated and included in the UGA because of the lack of long-term commercial significance.⁹

The County's determination was based upon the substantial evidence in the record identified above and application of the appropriate legal criteria.

4. Other Evidence before the Growth Board

Deliberation of Proceedings – Clark County Board of Commissioners' Public Hearing (Exhibits 6606 and 6430) is also a part of this record on review. The Deliberations illustrate how this public process was thorough, detailed and site specific.

⁹ Exhibit 6512 at 9-10.

The above-referenced documents constitute additional portions of the record that were before the Growth Board prior to the Growth Board's AFDO. It is against this substantial evidentiary background supporting the County's action and the absence of any evidence from the Appellants, save for a few aerial photos presented at the hearing before the Growth Board, and again before the trial court, that the Court of Appeals must evaluate this appeal. Because of the absence of any competent evidence repudiating or challenging the County and Respondents' arguments, the Growth Board did not properly conclude that the County's action was "clearly erroneous".

D. THE GROWTH BOARD'S DECISION AND RATIONALE FOR INVALIDATING CLARK COUNTY'S ACTION WITH RESPECT TO WASHOUGAL SUB-AREA "WB"

In issuing its AFDO, the Growth Board concluded that "Based on the County's decision making criteria, the Board finds the County erred in de-designating this land. This designation does not comply with RCW 36.70A.020(8) and 36.70A.170." AFDO, p. 64. The Growth Board went on to explain its reasoning as follows:

The County's Matrix describes the land as having 82% prime agricultural soils. Most soils appear to be Class I and II. The Matrix also says that it is to be brought into the area to provide tax base for the Battle Ground [sic.] School District. The area is not adjacent to the UGA and no permits for development have been issued nearby. Intervenor says that his land is not productive as a farm based on analysis by Globalwise. However, productivity is a character of the soil as described by WAC 365-190-050. In evaluating critical areas, cities and counties use Best Available Science to help designate critical areas. The resource that the GMA gives cities and counties is USDA soil characteristics and that is what the Board needs to rely

on. The County's Ordinance says that this area was de-designated because it no longer has long-term commercial significance.

E. THE GROWTH BOARD'S DECISION WAS IN ERROR IN LIGHT OF ALL THE EVIDENCE IN THE RECORD

The summary decision of the Growth Board with respect to the MacDonald Property merely states that the County Matrix shows prime soils; and thus, must be designated agricultural land. The Matrix was but one tool utilized by the County which compared each of the GMA criteria necessary to evaluate whether certain areas met the statutorily defined and judicially interpreted definition of agricultural land. The Revised Code of Washington defines agricultural land in pertinent part as follows:

“Agricultural land” means land primarily devoted to the commercial production of horticultural, viticultural, floricultural, dairy, apiary, vegetable, or animal products or of 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, and that has long-term commercial significance for agricultural production.

RCW 36.70A.030(2).

In analyzing the GMA, the Washington Supreme Court held that **all three requirements must be met (not just soil type)** in order to classify land as “agricultural land” under the GMA:

[A]gricultural 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.

Lewis County, 157 Wash.2d at 502, 139 P.3d at 1103. (Emphasis added)

Despite the presence of substantial evidence in the record, neither the second, nor the third statutory requirements of the agricultural land tests were addressed by the Growth Board in any meaningful way. These criteria were, however, addressed by the County.

The second element in designating agricultural land requires that the land be primarily devoted to agriculture. Land that is primarily devoted to agriculture means land that is “actually used or capable of being used for agricultural production.” *City of Redmond*, 136 Wash.2d at 53, 959 P.2d at 1097 (1998). However, it is important to note that the Court in *Lewis County* specifically recognized that capability of being farmed, without more, was neither a criteria mandating designation, nor grounds for electing not to designate the lands considering the criteria at WAC 365-190-050. *Lewis County*, 157 Wash. 2d 488, 139 P.3d 1096 (2006). In this case, there is substantial evidence that this property is not capable of being used for agricultural production (*see* Exhibit 5837 that includes analysis of whether property could be used for cow/calf production, grain, hay, Christmas tree, nursery and other potential agricultural uses.) Accordingly, the MacDonald Property does not meet the statutory criteria for agricultural land and was properly de-designated.

The third element in designating agricultural resource land **requires** that the agricultural land have long-term commercial significance. 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." RCW 36.70A.030(10). In addition to these enumerated statutory factors, a county may consider the ten "development-related factors" promulgated by the Department of Community, Trade, and Economic Development in WAC 365-190-050(1). *Lewis County*, 157 Wash.2d at 502, 139 P.3d at 1103. The Washington Administrative Code states in pertinent part as follows:

Counties and cities **shall** also consider the combined effects of proximity to population areas and the possibility of more intense uses of the land as indicated by:

- (a) The availability of public facilities;
- (b) Tax status;
- (c) The availability of public services;
- (d) Relationship or proximity to urban growth areas;
- (e) Predominant parcel size;
- (f) Land use settlement patterns and their compatibility with agricultural practices;
- (g) Intensity of nearby land uses;
- (h) History of land development permits issued nearby;
- (i) Land values under alternative uses; and
- (j) Proximity of markets.

WAC 365-190-050(1) (2007). (Emphasis added)

In this case, there is substantial evidence in the record that the MacDonald Property does not meet the criteria for "long-term commercial significance for agricultural production" provided in RCW 36.70A.030(10). The land is not in any current agricultural use. See Bruce A. Prenguber, *Analysis of the MacDonald – Washougal Property* (Sept. 22, 2006), Exhibit 5837. The past agricultural use consisted of

pasturing twenty (20) to forty (40) head of cattle during the summer months—merely to qualify for agricultural property tax treatment. Exhibit 5837.

Approximately twenty-five percent (25%) of the MacDonald Property is sloped more than fifteen percent (15%), making it “unsuited to farming due to the potential for unstable soils and erosion if the ground was disturbed by frequent farm cultivation or moderate to heavy livestock grazing.” Exhibit 5837. Most or all of the soil located on the rest of the property consists of Hesson clay loam (“HcB”). Exhibit 5837. HcB soil in the area is only known for “some pasture or hay production.” Exhibit 5837.

Pasturing cattle is not an economically viable option for the MacDonald property. Exhibit 5837. The land is only capable of supporting approximately ninety-eight (98) head of cattle (with calves at their side) for two to three months per year. Exhibit 5837. The annual net loss for such a small herd would be approximately seventeen thousand, one hundred and fifty dollars (\$17,150) to thirty-four thousand, nine hundred and eighty-six dollars (\$34,986). Though cattle could be maintained on the property during the winter if given cover and supplemental feeding, such an option is commercially impossible because the cost for such cover and extra feed would be prohibitive to any farmer, and the cattle would have to be rotated to different pastures during the remainder of the year. Exhibit 5837.

Like pasturing cattle, growing hay is also commercially unfeasible. Although sixty-five (65) acres of the property would be suitable for growing hay, the annual net profit would be a meager eight hundred and forty-five dollars (\$845), excluding any overhead or labor costs. Exhibit 5837. Obviously, this meager profit is insufficient to sustain commercial farming. Grain production would fair much worse than hay, resulting in an annual total loss of at least eight thousand, two hundred and seventy-five dollars (\$8,275). Exhibit 5837.

Christmas trees, too, are unlikely to have any “long-term commercial significance” on the MacDonald Property. Survey data shows that the production of Christmas trees has declined in western Washington over the past few years. Exhibit 5837. This is due, in part, to the rapid land appreciation in Clark County. Exhibit 5837. No commercial venture would pay the fair market value for land around the MacDonald Property in hopes of producing Christmas trees. Exhibit 5837. In addition, wholesale nurseries and berry crops are not likely to be successful long-term commercial ventures. *See* Exhibit 5837.

In addition to the poor soil, an analysis of the factors listed in WAC 365-190-050(1) demonstrate that the MacDonald Property was properly de-designated from an agricultural resource land. First, major public facilities such as sewer, storm water, and potable water are all able to be provided to the property. Exhibit 5837. In fact, the MacDonald Property is located only four hundred yards north of the pre-2007 Washougal UGB. Second, although the MacDonald Property is in an

agricultural/farm use tax designation, only two other properties of the eleven that surround the MacDonald Property also have the agricultural/farm use tax designation. Exhibit 5837. Third, the average parcel size of the eleven (11) properties surrounding the MacDonald Property is twelve point five (12.5) acres. Fourth, long-term agricultural production on the MacDonald Property would be incompatible with the surrounding area:

The rapid expansion of the urban area of Washougal and Clark County has changed the intentions of land owners, who anticipate that more intensive development will occur when the Washougal UGB expands. **Much of the land near the MacDonald property is in small acreages with home sites, which are often incompatible with agricultural practices that create dust, noise, spraying or odors.** Locating a residential development or a business park on this site is compatible with the surrounding character of the area.

Exhibit 5837. (emphasis added).

Fifth, owners of several of the surrounding properties have submitted preliminary development applications to Clark County. Exhibit 5837. Sixth, farmers will not generally pay more than ten thousand dollars (\$10,000) per acre for land; however, land in area is selling for approximately twenty-five thousand dollars (\$25,000) to fifty thousand dollars (\$50,000) per acre. Exhibit 5837.

In sum, the MacDonald Property has no “long-term commercial significance for agricultural production.” The soil is poor, and the crops it could sustain neither have short or long term commercial significance. Grazing cattle on the land is not commercially feasible and the fair market

value of the land is too prohibitive for commercial production. Accordingly, the MacDonald Property was properly de-designated for “more intense uses.”

The Growth Board erred in failing to acknowledge the County’s consideration of all of the statutorily mandated criteria. The Growth Board also erred by not acknowledging the County’s consideration of the factors required to be considered under WAC 365-190-050(1). The Board compounded these errors by primarily relying upon soil type as the determining factor in its Decision. This is clearly contrary to both the statute and *Lewis County*.

The Growth Board’s Decision also finds that the “area is not adjacent to the UGA” AFDO, p. 64. This finding is in error. The County added approximately sixty (60) parcels in the northeast area of Washougal to the UGA. The WB parcels are a small part of the area added to the Washougal UGA. The area added to the Washougal UGA, including sub-area WB lies adjacent to the Washougal UGA. *See* Washougal Map, Exhibit 6605. If the Growth Board’s argument is correct, a county could only add those parcels that are abutting the existing UGA. This is contrary to any UGA expansion and would prevent a county from complying with its GMA mandate to provide an adequate supply of developable land. RCW 36.70A.110(2).

Finally, the Board decrees that “productivity” is a character of soil types. True, but productivity is not the GMA established criteria for designation of agricultural land. Productivity of soil is but one of the

many factors that the GMA and the Washington Administrative Code require to be considered in designating land as agricultural. The Growth Board failed to consider the substantial evidence in the record relating to all of the other criteria. As such, the Growth Board's decision was properly reversed by the trial court.

IV. CONCLUSION

MacDonald respectfully requests the Court of Appeals affirm the trial court's Order dated June 12, 2009 that reversed the June 3, 2008 AFDO issued by the Growth Board based on the substantial evidence in the record, the standard of review and the arguments set forth above.

The record relating to the MacDonald Property is not anecdotal. The record established by credible scientific expert testimony clearly shows that the MacDonald Property does not meet the test for designation as agricultural property. This evidence is uncontroverted in the record. Appellants have placed no evidence whatsoever into the record upon which the Court of Appeals could find that the facts and analysis as presented by this expert testimony are false. Appellants cannot now supplement the record to cure this defect. As such, the facts asserted and scientific conclusions reached are verities on appeal.

This uncontroverted evidence establishes: (1) that the proper criteria was utilized to evaluate whether the MacDonald Property met the test for de-designation; and (2) that when this criteria was applied to the specific facts of the MacDonald Property, (including the area surrounding

the property), the MacDonald Property does not meet the test for designation of agricultural land. As such, the County's actions were not clearly erroneous, Appellants appeal should be denied and the trial court's order should be affirmed.

DATED this 16th day of December, 2009.

Respectfully Submitted,

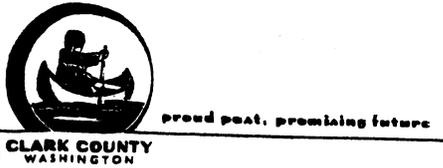
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Handwritten signature of Randall B. Printz and Brian K. Gerst, consisting of two distinct signatures in black ink.

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Attorneys for Respondent
MacDonald Living Trust

APPENDIX 1

Exhibit 6605



COPY

COMMUNITY PLANNING

MEMORANDUM

TO: Board of Clark County Commissioners

FROM: Marty Snell, Director

DATE: August 3, 2007

SUBJECT: Issue Papers

Following the Board's deliberation of July 5, 2007, staff commenced work on issue papers related to the Comprehensive Plan update. The list of issue papers below are intended to provide the Board a more clear set of findings that support its ultimate decision.

The issue papers are as follows:

1. Capacity Numbers (VBLM) – July 5, 2007 Tentative Map
2. City Overrides (pending completion)
3. Sequencing
4. 5-Year Rule / Triggers (pending completion)
5. County-wide Planning Policies
6. Employment Land (pending completion)
7. Agricultural Land
8. SEPA Issues
9. Fish & Wildlife – Open Space Corridor (pending completion)
10. CFP (pending completion re: Ridgefield sewer)
11. Schools (pending completion)
12. Transportation
13. Public Involvement

Attached to this memorandum are the issue papers completed to date. On or before August 14, 2007, all of the issue papers will be substantially completed and distributed to the Board.

From the August 8 work session, staff will be seeking Board direction on the following items:

- Discussions between Clark County and the city of Vancouver (executive session);
- Ridgefield sewer issue;
- Employment land designation and jobs implication; and
- County-wide planning policies on:
 - Annexing Agriculture lands
 - City of La Center – Area LE, card rooms increase, 2nd bridge across the East Fork of the Lewis River
 - City of Ridgefield – (staff direction on the “donut hole” and TDR).



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20-YEAR COMPREHENSIVE GROWTH MANAGEMENT PLAN 2004-2024

Issue Paper #7 – Agricultural Lands

Background

The update of the 20-year Comprehensive Growth Management Plan for Clark County was initiated in 2005 as a result of Western Washington Growth Management Hearing Board appeals to the 2004 plan. Part of the plan includes a proposal to expand urban growth boundaries around each of the cities. A percentage of the land proposed for inclusion is currently designated as agricultural land.

The Growth Management Act (GMA) requires that each county shall designate where appropriate "agricultural lands that are not already characterized by urban growth and that have long-term significance for the commercial production" (RCW 36.70A.170). RCW 36.70A.060 requires that counties "...develop regulations to assure the conservation of agriculture, forest, and mineral resource lands...", and that "such regulations shall assure that the use of lands adjacent to agriculture, forest, and mineral resource lands shall not interfere with the continued use." The county has designated resource lands and development regulations to assure their conservation in the current comprehensive plan.

A matrix of analytical information was presented to the Board of County Commissioners (Board) regarding those lands that were proposed to come into the Urban Growth Boundaries according to the Preferred Alternative map. In order for the agricultural land to be brought in as urban land, it must first be de-designated from agriculture or subject to a Transfer Development Rights Program.

In order to de-designate agricultural lands, the Board is required to make findings based upon the record that the lands do not meet one or more of the criteria listed below. The matrix mentioned above includes information based on these criteria. The revised matrix which indicates those areas that were tentatively approved to be included in the urban growth areas per the July 5, 2007 map is included as Attachment A.

- *Characterized by urban growth:*

Staff used the plain reading of "land already characterized by urban growth" as lands parcelized to urban levels with water and or sewer lines within the boundaries. Also noted was whether the sub-area is adjacent to an urban growth area, an urban reserve area, or a rural center.

- *Primarily devoted to commercial production of agricultural products or capable of production:*

This criterion relates to whether or not the land is in production or is capable of being used. The matrix indicates whether the land is actually being farmed by referencing the maps included in the Globalwise Report regarding the 145 farms that were identified as commercial farms. The percentage of land in the County's agriculture/farm current use program is also provided. Regarding capability, percentage of prime agricultural soils is indicated, as well as environmental constraints.

- *Having long-term commercial significance:*

This criterion considers the potential long-term commercial significance of land for agriculture based on growing capacity, productivity, and soil composition as well as proximity to population areas and the possibility of more intense uses of the land (RCW 36.70A.030(10)). The matrix indicates the land's soil types. With respect to proximity to population areas and the possibility of more intense use, the rest of the columns reflect the WAC criteria (WAC 365-190-050) that address this issue:

- Availability of public facilities;
- Tax status;
- Availability of public services (combined with public facilities);
- Relationship or proximity to urban growth areas;
- Predominant parcel size;
- Land use settlement patterns and their compatibility with agricultural practices;
- Intensity of nearby land uses;
- History of Land development permits issued nearby;
- Land values under alternative uses; and
- Proximity to markets.

Three recent court cases regarding the criteria used by counties in the designation and de-designation of resource lands were also discussed. The Supreme Court, in the *Lewis County* case emphasized the broad discretion counties have in making choices within the parameters set by the GMA and the implementing regulations issued by the Department of Community Trade and Economic Development.

BOCC Deliberation/Decision

Provided herein is a synopsis of the Board's decisions regarding the de-designation of agricultural land and inclusion into the cities' Urban Growth Boundaries. For further information regarding the analysis, please refer to Attachment A (Matrix), Attachment B (Agricultural Sub-Area Maps) and Attachment C (Cumulative Agricultural Analysis).

Battle Ground

For the Battle Ground UGA, the Board concluded that 413.56 acres should be de-designated from agriculture and brought into the UGA. The deliberations included 1) the proximity to urban areas; 2) the fact that parcels were not identified as primarily devoted to commercial production of agricultural products; and 3) that parcels were environmentally constrained. Further discussion centered on the importance of an employment land component to the City of Battle Ground's tax base and the benefit that that land use would also have on the School District.

The proximity to existing adequate infrastructure, potential for job production and opportunity to increase the tax base for the City led the Board to de-designate sub-areas *BB* and *BC* from agriculture and to bring those lands in as employment and residential land. The land proposed as Urban Low Density Residential is already parcelized and characterized by urban growth.

Camas

For the Camas UGA, the Board concluded that 721.32 acres should be de-designated from agriculture and brought into the UGA as Residential, Mixed Use, Employment Land, and Parks. During the deliberations of long term agricultural commercial significance, the prime agriculture soils within sub-area *CA-1* were identified as located mostly under the existing golf course. Sub-area *CB* has an identified farm within the boundaries. The area, however, provides unique economic development opportunities for Camas, which is important for the city because of the downsizing of the Georgia Pacific paper mill. The long term commercial significance of the farm was discussed and Commissioner Boldt noted that the dairy farm is far from any agricultural services. As costs increase, it will not be economically feasible to continue to farm at that location. Once the cows leave, the soils will worsen, thus decreasing the economic viability of the land.

The Board also concluded that 68.45 additional acres should be de-designated from Forestry and brought into the UGA. A forestry analysis report was done for this area (Attachment D), which concluded that there would be no public benefit in attempting to manage the site for commercial timber production. It also concluded that there was no incentive for an owner of the property to invest in any timber management practices because the current stand is not increasing in usable volume or value. There would be insufficient time to realize any return on investment by rehabilitating the site and establishing a new rotation.

La Center

For the La Center UGA, the Board concluded that 634.61 acres should be de-designated from agriculture and brought into the UGA as Residential and Employment Land. Some of the sub-areas were already characterized by urban growth and none were currently devoted to commercial production of agricultural products. Most were determined incapable of being used for production due to low percentage of prime agricultural soils, environmentally constrained land and/or the lack of water available to the area in order to farm. Some of the agricultural land being proposed is located near the I-5 transportation corridor, and is the only Industrial opportunity for La Center. The importance of providing employment land for La Center to diversify their economy was a critical part of the decision.

It was further stated that a County-wide Planning policy would be written for sub-area *LE* that explained that the land could only be developed, if the Tribal land received 'trust' status from the federal government.

Ridgefield

For the Ridgefield UGA, the Board concluded that 788.04 acres should be de-designated from agriculture and brought into the UGA as Residential and Commercial land. The sub-areas are already characterized by urban growth with proximity to the existing Urban Growth Area and City limit boundaries.

Although farms in commercial production were identified within the sub-areas, it was determined that they do not have long term commercial significance because of their adjacency to urban land uses, such as schools and residential uses. One of the areas is located along a roadway that is planned to be built out in order to provide another access in and out of the city.

Sub-area *RB-1* had three identified farms within its boundaries, but is surrounded on three sides by Ridgefield's existing Urban Growth Boundary and city limits. It was concluded that this would be an appropriate spot for the sending area of a Transfer of Development Rights (TDR) program. In an effort to avoid creating an island of agricultural land surrounded by urban land, it was decided that a County-wide Planning policy should be created with cooperation from the city to allow annexation only after the adoption of a TDR program.

Vancouver

For the Vancouver UGA, the Board concluded that 1,383.18 acres should be de-designated from agriculture and brought into the UGA as Residential and Employment land. Most of the sub-area's land mass is characterized by urban growth with close proximity or adjacency to urban land uses such as schools, infrastructure and urban residential areas. Although there are three identified farms within one of the sub-areas, none of the land was determined to be of long-term commercial significance because of the proximity to existing urban areas. In addition, the sub-area with the three farms within its boundaries is in a location that provides a unique opportunity for industry. It is adjacent to the railroad, SR 503, and NE 119th Street. It was determined that it should be converted to a higher and better use (Employment land), which will provide a greater tax base for Battle Ground School District.

Washougal

For the Washougal UGA, the Board concluded that 369.71 acres should be de-designated from agriculture and brought into the UGA as Residential and Employment land. Neither of the two sub-areas was identified as primarily devoted to the commercial production of agricultural products. It was determined that sub-area *WA* did not have long term commercial significance because of the close proximity to urban areas and the fact that parts of the area were already within Urban Reserve overlays. Sub-area *WB* has good agricultural soils and low critical land, but has no access to water. It was determined that both these sub-areas would serve a higher purpose as employment land, which would create more jobs, increase the tax base for the City and benefit the School District.

Further information

The Board hired Globalwise, an agricultural/economic consultant, to study the state of agriculture in Clark County. The Globalwise report was utilized as part of the information provided to the Board for their deliberations. The report concluded that traditional agriculture is declining in Clark County, primarily due to increasing property values.

By request from some property owners, Globalwise has completed analysis reports for parcels within the sub-areas that are proposed to be included in the cities' urban growth boundaries. The sub-areas and the conclusions from the reports are included below:

- **BB:** The report concludes that the parcel has not been producing agricultural products in recent times and it does not have significant long-term commercial agricultural potential. Further conclusions state, "...other land in the vicinity...does not meet the GMA definition of agricultural resource lands".
- **LB-2:** The report concludes that the subject parcel fails to meet the Growth Management Act definition of Agricultural Resource Lands. It states that it has not been producing agricultural products in recent times and it does not have significant long term commercial agricultural potential. Further conclusions state, "...other land in the vicinity...does not meet the GMA definition of agricultural resource lands".
- **VC:** The report concludes that the subject parcel fails to meet one element of the GMA definition, which it does not have long-term significant commercial agricultural potential and that the property is already characterized by urban growth.
- **VE:** The report concludes that the Fifth Plain Creek project properties and surrounding land fails to meet Growth Management Act Definition of Agricultural Resource lands. It further states that the only to a very limited extent does any agricultural production exist in the Fifth Plain Creek area. The report also includes the statement that most farmers have already left this area and those who remain are in the process of closing their farm operations due to lack of profit. Within two to three years this area will have no commercial production of agricultural crops or livestock products.
- **WB:** The report concludes that the subject parcel fails to meet both elements of the GMA definition and that it has not been producing agricultural products in recent times and that it does not have significant commercial agricultural potential for the future. The report further states that the land in the vicinity of the area does not meet the GMA definition of agricultural resource lands.

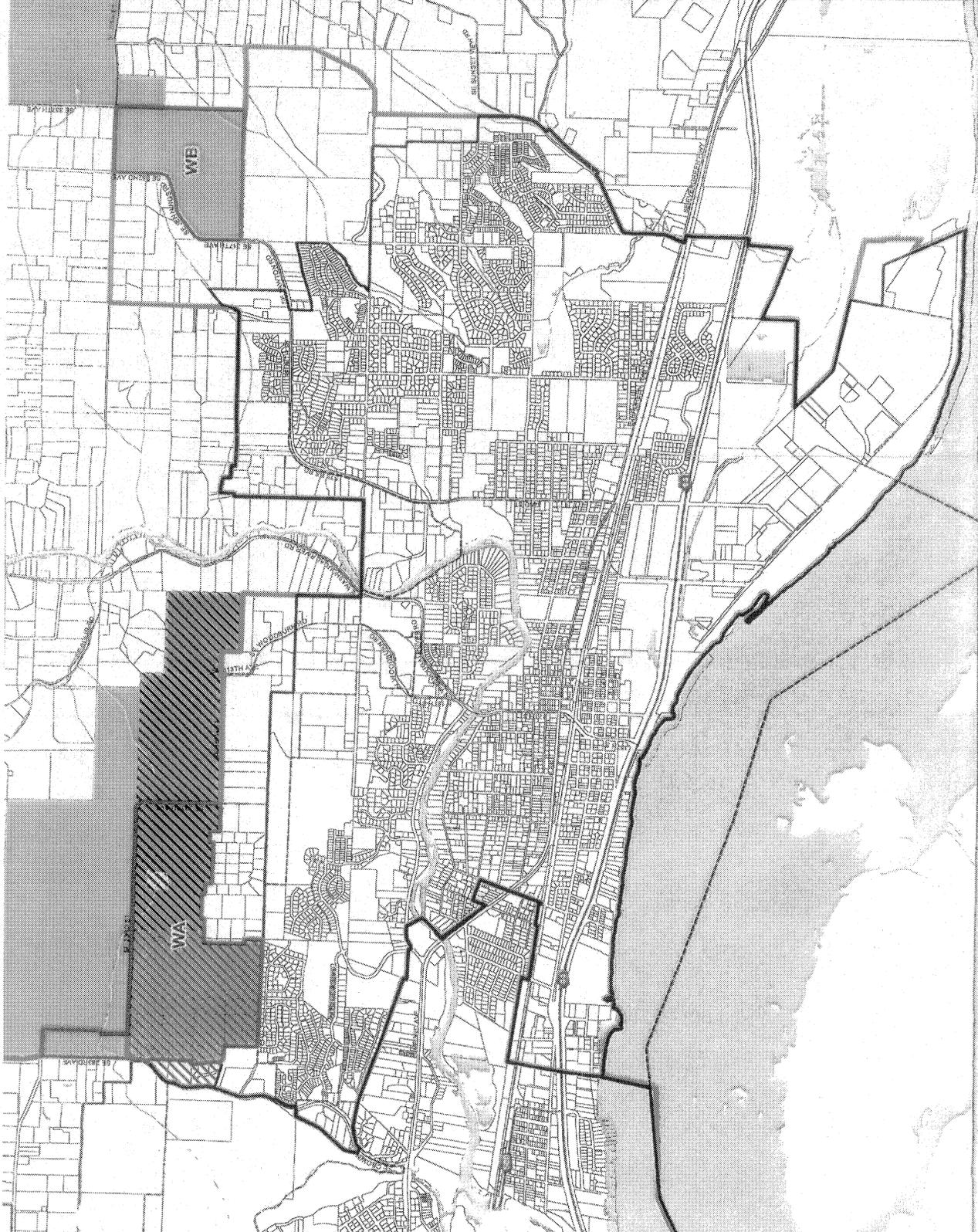
JULY 5, 2007 & AUGUST 14, 2007 BOCC TENTATIVE LAND USE MAP: AGRICULTURAL ANALYSIS, DELIBERATION AND DECISION

DOES IT HAVE LONG TERM COMMERCIAL SIGNIFICANCE FOR AGRICULTURAL PRODUCTION?												
AG SUB AREAS (See Attachment A for locations)	IS IT CHARACTERIZED BY URBAN GROWTH?	IS IT PRIMARILY DEVOTED TO COMMERCIAL PRODUCTION OF AGRICULTURAL PRODUCTS OR CAPABLE OF BEING USED FOR PRODUCTION?	PUBLIC FACILITIES/SERVICES	TAX STATUS	UGA	PARCEL SIZE	LAND USE SETTLEMENT PATTERNS AND COMPATIBILITY	INTENSITY OF NEARBY LAND USES	HISTORY OF LAND DEVL. PERMITS	LAND VALUES UNDER ALT USES (\$ in thousands)	PROX TO MARKETS	BOCC DELIBERATION/ DECISION
WB 116.06 acres (Wash)	<ul style="list-style-type: none"> The 2 parcels are 37 - 78 acres No water/sewer lines within sub area. 	<p><u>IN COMMERCIAL PRODUCTION?</u></p> <ul style="list-style-type: none"> Neither parcel within the sub area was identified as commercial farms in the Globalwise report maps 100% in farm/ag current use program 82% prime ag soils 5.89% critical land steep slopes, riparian habitat <p><u>CAPABLE?</u></p>		100% ag/farm current use program	Not adjacent to Washougal UGA	Range 37.41 - 78.65 acres Median parcel size: 58.03 acres	The two parcels comprising the sub area are open fields with a portion of forested land. No structures appear to be on these two parcels. The surrounding land settlements include open fields, forested land & rural residential.	More intense land uses are within the UGA. However, these two parcels are not adjacent to the existing UGA.	No urban development permits within the vicinity	AG-20: \$16/acre Proposed Zoning: Employment Center/ Business Park.	In close proximity to Washougal UGA	The low percentage of critical land and high percentage of prime ag soils only provide good farm land when there is access to water. There is no access to water in this sub area. The area would serve a higher purpose if converted to employment land which would increase the tax base for the City. It would also benefit the School District to assist in providing a better education for the children in the Washougal School District. It was determined that this area be designated from agricultural use and brought into the UGB as Employment Center/Business Park.

Agriculture Viability Study Areas
BOCC Tentative Urban Growth Area
Washougal UGA

Key

-  Study area boundary
 -  BOCC Tentative UGA boundary
 -  Adopted 2004 UGA boundary
 -  City Limits
- Zoning
-  Agriculture-20
 -  Forest-Tier II
- Zoning Overlay
-  Urban Reserve - 10
 -  Industrial Urban Reserve - 20
 -  Surface Mining Overlay District

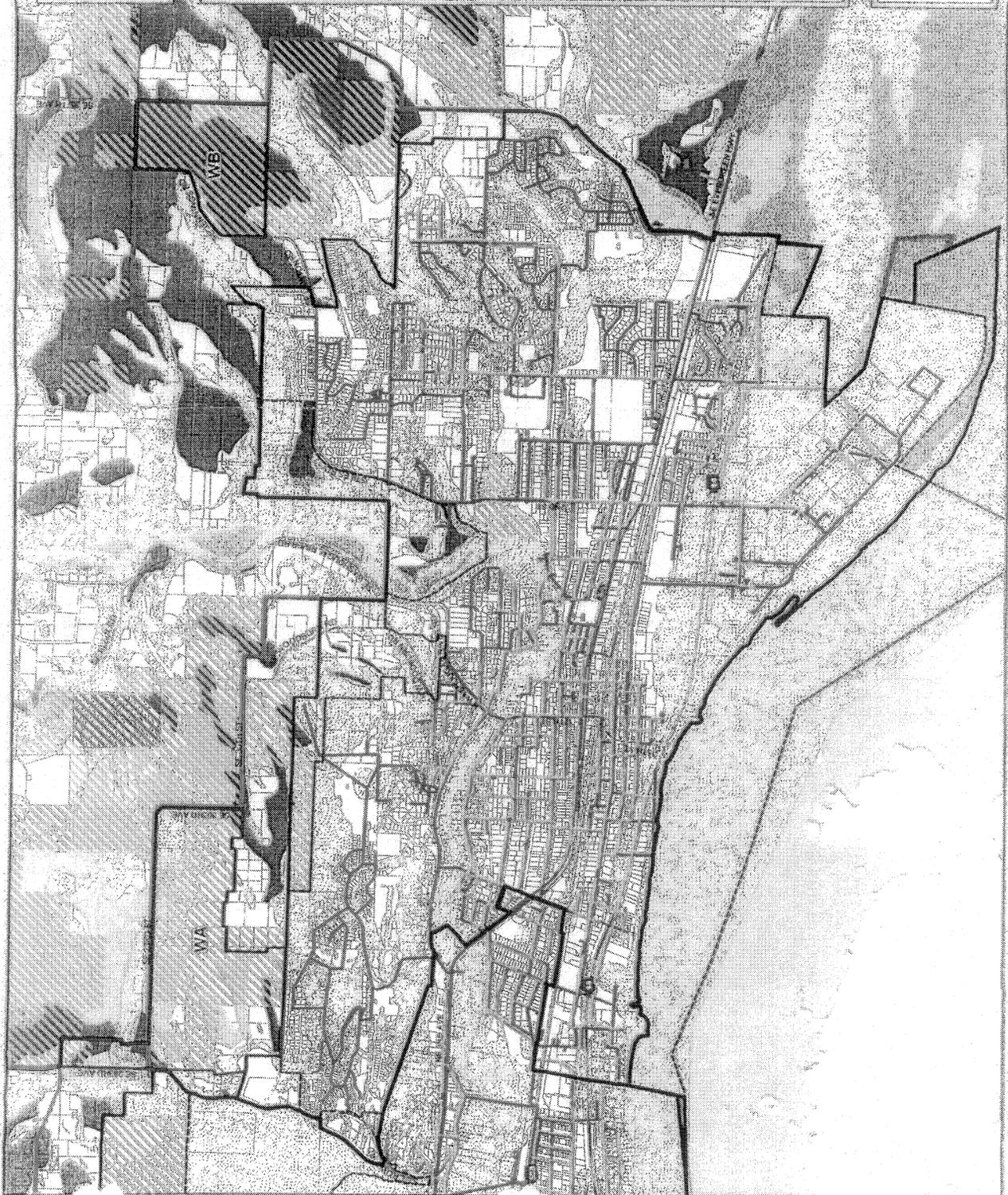


**Comprehensive Growth Management Plan
Washougal UGA - Map 1
Deliberation Components**

- Key**
- Prime AG Soils
 - Class I and II
 - Class III
 - Schools
 - Sewer Lines
 - Water Lines
 - Current Use
 - Farm & Agriculture
 - Currently Farm & Agriculture also Comp tax due
 - Application
 - Both Land Use & Designated Forest Land
 - Timber (Small tract)
 - Open space
 - Critical Areas
 - AG Viability Study Areas
 - Adopted 2007 UGA boundary
 - UGA boundary (2004)
 - City Limits
 - Water



Clark County
Department of Assessor and GIS
www.clarkcountyor.gov



**Comprehensive Growth Management Plan
Washougal UGA - Map 2
Deliberation Components**

- Key**
- Zoning
 - AG Viability Study Areas
 - Adopted 2007 UGA boundary
 - UGA boundary (2004)
 - Contours - 10 ft
- Development Permits**
- Conditional Use Application
 - Preapplication Conference
 - Preliminary Land Division
 - Final Land Division
 - Preliminary Site Plan Review
 - Final Site Plan Review
 - Planned Unit Development



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CUMULATIVE AGRICULTURAL ANALYSIS
August 14, 2007 BOCC TENTATIVE LAND USE MAP

ANALYSIS	PREFERRED ALTERNATIVE	August 14, 2007 TENTATIVE DECISION
TOTAL # of Acres in ALL Zoning Classifications	12,063 acres	~12,024 acres
Number of Agricultural Parcels	408	392
Range of Ag Parcels	0.19-222.16 acres	0.05-222.16 acres
Median Ag Parcel Size	11.87 acres	11.10 acres
Total Acres of Agricultural Zoned Land	4,690.27 acres	~4351.5 acres
% of Critical Land Zoned Ag	51.89%	49.92%
% Prime Agricultural Soils in Agricultural Zoned Land	62.5%	68.64%
% Farm & Agricultural Current Use	62.22%	65.95%

PROPOSED LAND USE CLASSIFICATION OF DE-DESIGNATED AGRICULTURAL LAND:
AUGUST 14, 2007 BOCC TENTATIVE LAND USE MAP

Comprehensive Plan Land Use Designation	# Acres	% of Total De-Designated Agricultural-Zoned Land (~4,351.5 acres)
Urban Low Density Residential	1,767.22 acres	41%
Urban Medium Density Residential	344.64 acres	8%
Mixed Use	106.83 acres	3%
Light Industrial	1,020.62 acres	23%
Railroad Industrial	213.7 acres	5%
Employment Center/Business Park	622.7 acres	14%
Commercial	215.92 acres	5%
Parks	59.87 acres	1%

PROPOSED LAND USE CLASSIFICATION OF DE-DESIGNATED AGRICULTURAL LAND BY UGA

UGA	Urban Low	Urban Medium	Mixed Use	Light Industrial	RR Industrial	Employment Center/Business Park	Commercial	Parks	TOTAL
Battle Ground	135.05 acres	-	53.05 acres	-	-	68.16 acres	157.30 acres	-	413.56 acres
Camas	146.52 acres	214.53 acres	53.78 acres	-	-	270 acres	-	59.87 acres	744.7 acres
La Center	76.42 acres	96.33 acres	-	453.89 acres	-	-	25.67 acres	-	652.31 acres
Ridgefield	744.25 acres	10.84 acres	-	-	-	-	32.95 acres	-	788.04 acres
Vancouver	579.81 acres	22.94 acres	-	566.73 acres	213.7 acres	-	-	-	1,383.18 acres
Washougal	85.17 acres	-	-	-	-	284.54 acres	-	-	369.71 acres
TOTAL	1,767.22 acres	344.64 acres	106.83 acres	1,020.62 acres	213.7 acres	622.7 acres	215.92 acres	59.87 acres	4351.5 acres

APPENDIX 2

Exhibit 5837

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Randall B. Printz

October 2, 2006

Marty Snell, Director
Clark County Community Planning
PO Box 9810
Vancouver, WA 98668-9810

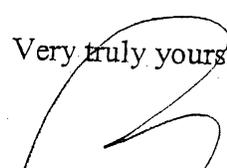
Re: Draft EIS Comment Submittal – Area 7, City of Washougal UGA

Dear Marty:

Please find the following items related to parcels 129825-000, located in Area 7 of the City of Washougal's Urban Growth Area, in response to the Draft EIS Statement released on August 25, 2006:

- 1) Overall Draft EIS Comments prepared by Randy Printz
- 2) Agricultural Suitability Analysis prepared by Globalwise, Inc.
- 3) Sewer and Water Maps from July 2006 Capital Facilities Plan for City of Washougal
- 4) Letter to Clark County supporting inclusion of the property in Washougal's UGA
- 5) Clark County Developer's GIS Packet

Very truly yours,


RANDALL B. PRINTZ

RBP:kf

Enclosures

✓ cc: client

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October 2, 2006

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c/o Marty Snell
Director of Long Range Planning
P.O. Box 9810
Vancouver, WA 98666-9810

Re: Comments to Draft Environmental Impact Statement for the Comprehensive Growth Management Plan of Clark County Dated August 25, 2006

Introduction

The Landerholm Law Firm represents a variety of property owners and other business interests in Clark County who are participating in this GMA update process. Concurrent with this Comment Letter we are submitting on their behalf an array of site specific information and analysis relating to the various environmental factors identified in the Draft EIS. These materials also contain factual information and analysis demonstrating the appropriateness of each property's inclusion in the "to be" amended Urban Growth Boundary. What follows in this letter are general comments relating to the Draft EIS itself; these comments do not pertain to any particular piece of property.

Transportation:

The DEIS provides:

"Increasing densities would make more efficient use of current infrastructure (for roads, schools, wastewater and water supply) and land." This statement is totally inconsistent with Clark County's and the various Cities' concurrency provisions for a variety of public facilities; most significantly transportation. To suggest that stuffing more cars into existing urban streets or children into the existing Vancouver or Evergreen School facilities is "more efficient", fails to recognize other basic premises of the Growth Management Act; namely: concurrency and levels of service.

Both the County and its Cities all have concurrency regulations for transportation. Under these existing regulations, the additional trips necessary to accommodate the projected additional 173,000 people inside the existing UGA's (Alternative 1) would be flatly prohibited by each the

Re: Comments to Draft Environmental Impact Statement for the Comprehensive Growth Management Plan of Clark County Dated August 25, 2006
October 2, 2006
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City's and Clark County's concurrency ordinances. There is no analysis in the Draft EIS or factual information relating to the extent to which level of service standards for transportation would have to be lowered on the various arterials, collectors and regulated intersections within any existing City limits to accommodate this increase in population. It appears from the Draft EIS that its drafters equate failing level of service with efficiency.

The DEIS also indicates that the Alternative 1 assumptions are based upon a "higher proportion of travelers using alternative transportation modes." There is no factual information or analysis in the Draft EIS relating to any increases to the alternative transportation services currently available within the Vancouver UGA. There is not any analysis or factual information relating to either the costs of those services or how they would be funded. Similarly, there is no analysis, nor factual information demonstrating that even if such facilities were available that ridership would increase to the extent that existing transportation levels of service would not be adversely impacted. **The bare assumption that alternative modes of transportation will increase and offset the potential congestion increases caused by further densification of the existing UGA is unsupported by the DEIS.**

Page 4 provides "it is expected that under this alternative (Alternative 2) the result would be a higher number of congested lane miles, vehicle hours of delay and vehicle miles traveled; and a somewhat lower share of transit and non-motorized modes, all as compared to Alternative 1."

Depending upon where the new residences in Alternative 2 work and access commercial services, a higher number of congested lane miles could conceivably occur. Similarly a higher number of uncongested lane miles would also likely be expected. There is no factual basis in the Draft EIS to support the proposition, however, that there will be more **vehicle hours of delay** in Alternative 2 than Alternative 1.

First, the cost for maintaining acceptable levels of service for Alternative 1 and Alternative 2 are identified in the Draft EIS as being the same. There is no factual information, nor analysis relating to the cost of retrofitting urban infrastructure as compared to constructing "green field" transportation infrastructure. It is undeniable that right-of-way acquisition and utility relocation costs will be many times more expensive in existing urban arterial corridors (Mill Plain, Fourth Plain, Main Street, Andresen, 136th Avenue, 164th Avenue, etc.), than it will be in areas proposed for inclusion under Alternative 2 (Fourth Plain, East of 162nd Avenue, 119th Street, 179th Street, and all collectors or arterials necessary to accommodate Alternative 2's transportation impacts in Ridgefield, La Center, Battle Ground, Camas and Washougal.)

Highly interesting, is the complete contravention of this DEIS stated premise (Alternative 2 more hours of delay) at the bottom of page 3. Page 3 provides: "it is expected that under this alternative (Alternative 1) the result would be a higher number of congested lane miles, vehicle hours of delay and vehicle miles traveled . . . as compared to Alternative 2. Clearly, the drafters of this document have directly contradicted themselves on a very basic, yet critical issue.

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Another striking fact is that the Draft EIS fails to analyze either the cost or level of service deficiencies for any arterials, collectors or intersections located within the City of Vancouver. Page 199 through 218 comprise the technical analysis for transportation. In this section, Table 67 identifies the major transportation corridors in both Alternative 1 and Alternative 2 as well as the estimated levels of service under both alternatives. Under the 24 corridors analyzed, **none of the corridors in Alternative 1 appear to have materially different level of service deficiencies than Alternative 2.** Most incredibly, **none of the analyzed corridors are located within the City of Vancouver which comprises a majority of Alternative 1.** It is an undeniable fact that the placement of over fifty thousand people inside the Vancouver UGA would materially impact the arterial, collector and intersection network within the City of Vancouver and its associated levels of service. No impacts to those facilities have been identified, nor have any mitigation measures or the costs thereof been analyzed.

Schools:

The Draft EIS indicates that Alternative 1 would more efficiently utilize current educational infrastructure than Alternative 2. **Again, much like transportation, this can only be true if efficiency equals failing levels of service.** The existing school districts within Alternative 1 are already on record as having capacity limitations. Additionally, in recent testimony before the Clark County Board of Commissioners on the Draft EIS the Vancouver School District indicated that it would be highly unlikely that they would be able to afford to purchase land within the existing Urban Growth Boundaries for future schools. This is because of the high cost of land within the Urban Growth Boundary.

Current land values near the edge of the proposed Alternative 2 of the Urban Growth Boundary are significantly less than those currently within Alternative 1. There is little or no comparative analysis between the costs of providing school sites for Alternative 1 versus Alternative 2. Similarly, there is no factual information or analysis on the ability of the Vancouver School District to fund the increased costs of Alternative 1. Finally, there is no factual information or analysis relating to the deterioration of the levels of service in schools located within Alternative 1 if sufficient additional schools cannot be funded and constructed.

Zoning:

The Draft EIS indicates that all the projected increase in population as well as all of the new jobs could be accommodated in Alternative 1 through residential up-zones and by up-zoning employment lands from industrial to business park.

On page 3 is a reference to potential up-zoning to accommodate this additional population. There is no discussion as to where that up-zoning would have to occur (other than within the UGA generally), to what extent it would have to occur, and whether the market would support such density. Further, it is highly unlikely that the existing City neighborhoods would support such intense up-zoning. No public process has occurred with the residents of the Cities' Urban

Re: Comments to Draft Environmental Impact Statement for the Comprehensive Growth Management Plan of Clark County Dated August 25, 2006
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Growth Boundaries relating to substantial up-zoning in their neighborhoods. This omission violates the enhanced public participation provisions of the Growth Management Act.

The suggestion that all employment land needs can be satisfied without any additional employment lands, but simply through the stroke of a pen (changing light industrial to business park) is without any factual basis and flies in the face of the Board's recent Emergency Ordinance reversing the identical proposal. In the 2004 Comprehensive Plan Update, the then Board of County Commissioners changed many light industrially zoned properties to business park. Because of the dramatic negative impacts to those industrially zoned lands the Board of Commissioners enacted an Emergency Ordinance redesignating most of those business park properties back to light industrial. While there is an assumption that business park creates more jobs per acre than light industrial, there is no factual basis in the Draft EIS demonstrating the demand for substantial increases in business park property.

Environment:

The Draft EIS states "in general, because Alternative 1 does not add new land proposed for development, the risks and constraints of the County's earth environment are bound to be fewer in terms of land area." **This fails to take into account the intense densification of the existing urban environment that must occur under Alternative 1.** It is interesting to note that in analyzing impacts to soils, the Draft EIS indicates that under Alternative 1, "there may be pressures to up-zone urban and possibly rural residential areas." Conversely, earlier statements in the Draft EIS indicate that in order to accommodate the OFM population projections for Alternative 1, substantial up-zoning and increase to density **must occur**. When evaluating Alternative 1's impacts to the earth, the Draft EIS mentions in passing that some areas **may** need to be up-zoned. It is difficult to argue that substantial densification of the existing urban environment currently necessary under Alternative 1 would materially decrease the amount of existing open space and materially increase the amount of impervious surface and non-native vegetation in the existing UGA. Similarly, non point source pollutants will be in greater concentrations (on a per acre basis) than in Alternative 2. No analysis or identification of these additional impacts is present within the Draft EIS.

These same issues are present with impacts to all of the natural environment including wildlife. The reason why a vast majority of the little remaining undeveloped land within the existing Vancouver UGA remains undeveloped, is because of topographic or other environmental constraints. A vast majority of those properties have been "passed by" because of their critical area constraints. There is no factual information, or analysis in the Draft EIS, relating to the substantial increase in impacts to those constrained lands within Alternative 1 due to the substantial densification of the urban environment necessary under Alternative 1. While it is true that more land, currently rural in nature, will be impacted by Alternative 2; **the opportunities for avoidance for critical areas and preservation of existing wildlife and other natural environments is far greater under Alternative 2 or 3 than it is under Alternative 1;** this

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occurs because there is a much larger land base to select from when designating lands for urban expansion.

The Draft EIS states that: "as discussed in detail in the beginning sections of this DEIS, the GMA was adopted to insure that development occurs in a planned manner, that there are adequate services available and that critical resources are protected." Unfortunately, this statement of the fundamental purpose of GMA left out the Act's other basic premise: that each County required to plan under the GMA is required by law to provide an adequate supply of land to accommodate the OFM population projection.

It is also interesting to note that the Draft EIS indicates that **under Alternative 1 up to 1,856 acres of industrial land would need to be rezoned**. The City of Vancouver is strongly on record as having a "no net loss" policy for industrial land. Both Clark County and the City of Vancouver assess strong regulatory restraints against converting industrial land, particularly to residential use. Additionally, **Alternative 1 indicates that over 5,000 acres of existing single family residential land would need to be up-zoned to accommodate multi-family housing**. The existing neighborhoods within the Vancouver UGA have repeatedly and strongly opposed multi-family housing in or near their single family residential neighborhoods. The various Cities' Planning Commissions and City Councils have historically supported the neighborhoods in their quest to preserve the single family detached character of their neighborhoods. Various cities have different regulatory mechanisms to assure that this occurs.

One example of this is the City of Camas' beveling regulations, which require new development adjacent to existing residential development to mirror on its perimeter the same lot size and zoning of the existing development. In both the City of Vancouver and Clark County, their planned unit development ordinances, typically utilized to increase or transfer density, yet contain provisions requiring compatibility with existing neighborhoods. There is no discussion or analysis in the Draft EIS relating to the regulatory changes necessary to accommodate either the conversion of almost 2,000 acres of industrial land to residential or the conversion of over 5,000 acres of single family zoned land to multi-family.

"One Sided Roads:"

The DEIS does not address the increase cost of providing urban services, particularly sewer, water and transportation, where the Boundary of the proposed UGA is established by a collector or arterial roadway. This increase in cost is particularly acute where that roadway or utility line must be constructed or increased in size to accommodate the proposed UGA expansion. One area where this is particularly noticeable is on 50th Avenue across from and south of Pleasant Valley School. While the Board is rightfully concerned with preserving the slopes to Salmon Creek, this area is flat and well above the slopes to the creek. Further to the south both sides of 50th Avenue have been designated for inclusion under Alternative 2 and 3. A "few parcels deep" swath of land should be added to the east side of 50th Avenue (and other similarly situated areas)

Re: Comments to Draft Environmental Impact Statement for the Comprehensive Growth
Management Plan of Clark County Dated August 25, 2006
October 2, 2006

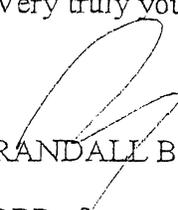
Page 6

to allow for private development dollars to fund the necessary transportation utility
improvements.

Conclusion:

The Final EIS needs to correct the above identified errors and deficiencies, as well as many
others which are too numerous to address on an item by item basis.

Very truly yours,



RANDALL B. PRINTZ

RBP:sfo

globalwise inc.

marketing and economic services

9311 SE Butte Avenue

Vancouver, WA 98664-3623

Tel 360-696-3888

September 22, 2006

Mr. Randall B. Printz
Landerholm Memovich Lansverk & Whitesides, P.S.
805 Broadway
Suite 1000
Vancouver, WA 98666-1086

Re: Agricultural Land Suitability for the MacDonald – Washougal Property (corner of SE 352nd Ave and SE 20th Street in Clark County, Washington)

Dear Mr. Printz:

In response to your request I have evaluated the MacDonald – Washougal property to determine if it meets the criteria under the Washington Growth Management Act (GMA) for agricultural resource lands. For the reasons stated in this letter, it is my opinion that the MacDonald – Washougal property does not meet the GMA criteria for agricultural resource lands.

I am qualified to render my opinions based upon my experience and educational attainment in the field of economics which I have gained from 29 years as a practicing economist with emphasis in agricultural economics and business. I was raised on a wheat and cattle ranch in Eastern Washington. I hold a Bachelors degree and a Masters degree in agricultural economics and I have completed 18 undergraduate and graduate level courses in economics during my education at Washington State University and the University of Wisconsin. I have worked most of my professional career as a consulting economist with experience in production agriculture and food processing. During the 2005 spring school term I taught an upper division microeconomic theory course in the

Business Department at Washington State University in Vancouver. For 27 years I have also been a partner and owner in businesses where I have gained practical experience with business management and business strategy that are significant to this case. I also have extensive experience working with food processing companies for the marketing of their food products. During my tenure as a consultant to food companies, I also worked for the Western U.S. Agricultural Trade Association (WUSATA) for many years. The function of WUSATA is to assist firms in the western U.S. with the export marketing of their products. I am a supplier member of the Northwest Food Processors Association and I am regularly retained to conduct projects and analyses for the Association. I have also been retained many times by food processing and marketing companies in the Pacific Northwest to address specific business issues pertaining to their operations. My experience is further described in my curriculum vita which is attached as Attachment 1.

Conclusion of This Analysis: The MacDonald – Washougal Property and Surrounding Land Fails to Meet Growth Management Act Definition of Agricultural Resource Lands

Agricultural land is defined by the Washington Growth Management Act as “land primarily devoted to the commercial production of horticulture, viticulture, floriculture, dairy, apiary, vegetable, or animal products or of berries, grain, hay, straw, turf, seed, Christmas trees or livestock, and that has long-term commercial significance for agricultural production” (WAC 365-190-050A). This definition states two conditions that must be met: the land is in an area used for or primarily devoted to agricultural production and the land has on-going commercial significance for agricultural production. ***In my opinion, the subject parcel fails to meet both elements of this definition: it has not been producing agricultural products in recent times and it does not have significant commercial agricultural potential for the future.***

I also believe other land in the vicinity of the MacDonald – Washougal parcel does not meet the GMA definition of agricultural resource lands.

Historical Use and Conditions

The current owners purchased the property from the estate of John Erickson in 1970. The owners have renting the property for minimal livestock grazing or haying since purchasing the property and at no time during this time has there been active farm management. At best, the agricultural use has been passive, with pasturing of 20 to 40 head of cattle only in the summer months. The primary reason there has been any agricultural activity is to maintain eligibility for agricultural or farm use value property tax treatment.

The MacDonald property is comprised of about 79 acres. About 75 to 80 percent of the land is gently rolling. The remaining land has south slopes of 15 percent or more. Much of the steeper land is in a native stand of fir trees. The steeper ground is clearly not suited to farming due to the potential for unstable soils and erosion if the ground was disturbed by frequent farm cultivation or moderate to heavy livestock grazing.

Aerial photography taken in 1968 shows that most of the property has been cleared and used for hay or pasture. Comparing the 1968 aerial photo to aerials in 1974, 1984, 1994 and 2005 shows that there has been very little change in land use activities except that

there has been progressively less management of the land, particularly from 1994 to 2005. Visual inspection of the property clearly indicates that it is reverting to blackberry bushes, brush and coarse grasses. The land is not is active management for any agriculture or forestry purposes.

A long abandoned homestead is on the property. An old barn that has collapsed can be found among overgrown blackberries. A temporary holding pen for livestock is the only remnant of anything approaching agricultural improvements within the site. The perimeter fencing varies from unusable to usable condition. There is no operating water well and there is no surface water source on this land.

Up to about 1960 the land was managed as a small farm by John Erickson. Relatives of Mr. Erickson say that once there was a small prune orchard of about five to six acres on the property. In addition Mr. Erickson had a few milking cows, and a small number of beef cattle, chickens and hogs. However this small scale agricultural activity ceased when the property was sold by Mr. Erickson's estate 36 years ago. The long standing lack of agricultural activity on the MacDonald parcel is consistent with the general absence of commercial agricultural production in the Mount Norway area and the downward trend of agriculture throughout Clark County.

The character of this area is now a mix of rural residences with some properties having small tracts of hay and pasture. The incidental grazing by cattle or horses and grass hay production do not constitute commercial agricultural uses of land and are not agricultural resource lands under the definitions of the GMA. Two small parcels planted to Christmas trees were observed north of the MacDonald property and across SE 20th Street. The properties planted to Christmas trees are within R-5 zoning and they are on five acre parcels with residences. One of the two Christmas tree plantings has possibly been abandoned or has very little current management. Along the north east boundary of the MacDonald property, there is a five acre parcel that is also on the AG-20 zone. This parcel was split into an eight-lot rural subdivision known as Murray Estates in the mid-1990's. Other parcels that adjoin the MacDonald property range in size from 2.5 acres to 40.25 acres. The average parcel size of the 11 adjoining properties is 12.5 acres.

The MacDonald property is in agricultural or farm use value tax designation. Review of property tax records in the Clark County Assessment and Taxation System shows that out of 11 parcels that adjoin this property, two are in agricultural or farm use value assessment and two are in timber or forest use tax designation. One of the two properties that is on agricultural/farm use tax designation is in the R-5 zone and the other is in the AG-20 zone.

The MacDonald property is approximately one-half mile from the Urban Growth Boundary of Washougal.

Parcel Characteristics and Long Term Commercial Agricultural Production

Looking to the future, there is no evidence to support the prospect that the MacDonald-Washougal property will revert to agricultural use in the future for the reasons presented below.

Soils

Soils are one of the important determinants of commercial agricultural production potential. The U.S. Department of Agriculture (USDA) soil survey for Clark County shows three soil map unit names on the MacDonald– Washougal property (see Soil Survey of Clark County, Washington, November 1972, or USDA Natural Resources Conservation Service, Soil Survey of Clark County, Washington, online soil maps, at <http://ice.or.nrcs.usda.gov/website/clark/viewer.htm> .

About 80 percent of the land in this parcel is Hesson clay loam (HcB). These soils are the dominant soil of the high terraces along the mountain foothills in the county. This soil is generally well drained with 0 to 8 percent slopes. They are in capability class II. At this site, these soils have little history of use for any agricultural purposes other than some pasture or hay production. There is no known history of active cultivation for vegetable or fruit crops.

The second major soil unit on the MacDonald property is Hesson clay loam (HcD) with capability class III. Approximately 10 percent of the MacDonald property is in this soil mapping unit. This Hesson loam is on slopes of 8 to 20 percent. These soils are more difficult to manage because of the steeper slopes and generally their use is limited to hay or pasture.

The third major soils on the MacDonald property are Hesson clay loam (HcE) with 20 to 30 percent slopes. About 10 percent of the MacDonald property is in this soil mapping unit. The USDA soils survey describes these soils are similar to HcB except the surface layer of soil is thinner compared to the same soils found on more gently sloping land. Capability class is IV and the land is all in tree cover on the MacDonald property. Erosion hazard is significant on these lands without the tree cover that exists.

Water

There is no existing water well serving the MacDonald property. Forty or fifty years ago the small prune orchard may have been irrigated, at least to establish the young trees. No irrigation has been applied to the land for over 35 years or perhaps much longer.

Current Land Use

Property in the vicinity of the MacDonald parcel is generally in ownerships of five to 10 acres in rural residential use. There is hay production or pasture grazing on one larger parcel on the southwest side of the MacDonald property. There are also two small acreages of Christmas trees to the north of the MacDonald property which each appear to be part of 5 acre rural residential properties. Two timber/forested parcels of 20 and 40 acres adjoin the MacDonald property. The remaining six properties are in rural residential use that range from 2.5 acres to 5 acres.

For much of the past 35 years the MacDonald property has been rented for temporary summer grazing of a small herd of cattle. This is providing incidental income and is insufficient to be considered long-term commercial agricultural production.

The MacDonald property is in AG-20 zoning. The 39 acre pasture/hay parcel to the west and the 5 acre parcel (which is part of Murray Estates Subdivision) on the northeast side of the MacDonald property are also part of the AG-20 zoning in this area. Other parcels to the north, west and east of the subject property are in R-5 zoning. The property immediately south of the MacDonald property is in R-20 zoning.

Land Prices

High land prices are another major impediment for establishing any agricultural enterprise on the MacDonald– Washougal property. Farmers generally will pay a maximum of about \$10,000 per acre for land, and they seek to pay much less due to the narrow margins in agriculture. In this area recent land sales have been reported at \$25,000 to \$50,000 per acre or more. At these prices new farmers will not make the business decision to come to this area to buy the land for commercial agricultural production. There are no farmers to buy the land to replace the current land owners who have ceased commercial farming practices.

Economics of Farm Production on the MacDonald – Washougal Property

I believe the limited potential to derive income is the dominant reason the MacDonald – Washougal property and most of the other nearby properties are clearly not devoted to agricultural production. I have conducted farm income analysis to evaluate the income potential if this property or surrounding properties were placed in agricultural production. The analysis covers agricultural production alternatives based on the types of agricultural enterprises that have existed in the past in this area and are most common in Clark County.

Cow-Calf Production

Data on cow-calf production was reviewed in view of land conditions at the MacDonald – Washougal property. The parcel totals 79 acres with about 15 to 20 percent unsuitable for grazing due to the steep slopes on the southeastern portion of the property.

The USDA soil data does not indicate the amount of animal unit months (AUMs) of grazing per acre that can be expected here. I estimate that 65 acres of the flat and gentle sloped portions of the property can be grazed. This would result in the carrying capacity of about 98 head of adult cows with calves at their side for two to three months per year. This is 1.5 adult cows per acre on a year round basis. Maintaining a herd of 98 cows in the winter climate here would be optimal with covered confinement with supplemental feeding and intensive pasture rotation during the remainder of the year. However, it is very unlikely any cattle operator would invest in a covered barn and corrals because of the negative returns that are indicated for this type of operation, as indicated below.

USDA budgets for cow-calf operations in the western U.S. from 1996 to 2004 show net losses for these operations for all years (see the following web site for details: <http://ers.usda.gov/Data/CostsAndReturns/data/recent/Cowc/R-FRCowc.xls>). The operations analyzed in the USDA budgets have 138 cows and an annual calf crop of 113 animals which is a larger herd than can be sustained on the MacDonald – Washougal property. While there are likely to be some economies of scale for a 138 cow herd that cannot be achieved with a smaller herd of 98 cows I have none-the-less used the same per cow costs as are presented in the USDA budget. Even without including opportunity cost for land and labor, the resulting return is a loss of \$175 per cow for the operating costs of the cow-calf enterprise. If an operator had 98 head of cows, the resulting annual loss would be \$17,150. When overhead costs are included with operating costs, the total annual loss is \$34,986.

In my judgment, the economics of such a small scale beef cattle operation is not feasible on the MacDonald – Washougal property. Similarly there is no economic feasibility for this enterprise on the small parcels (40 acres and less) that are adjoining properties in this area.

Grain Production

Grain such as wheat, barley and oats are among the least profitable agricultural crops to grow in Clark County. Furthermore the MacDonald property is not suited for grain because its higher elevation and exposure to high winds and freezing conditions in winter and spring months are negative factors.

U.S. grain prices are subject world competition and the prices received by farmers have not kept pace with rising costs. The favored areas for growing grain crops are in rural areas with large expanses of dry land where rainfall, other climatic conditions and soil combine to make grain production most efficient. As a result Clark County is a very minor grain production area, and the MacDonald – Washougal area is not suited to gain positive net returns from grain production. To illustrate this, I have analyzed a grain budget assuming that the most suitable flat and gently rolling land on the MacDonald property were cleared of wild blackberries and tree stumps. The budget shows 65 acres planted to barley with an estimated average yield of 60 bushels per acre. By my analysis this farming operation would have an estimated net loss of \$127 per acre or a total loss of \$8,275 per year. This understates the actual loss because no opportunity cost for land rent or mortgage is included. Taxes on land is also included at the assessed value of \$250 per acre (the average assessed value of agricultural designated land in Clark County for 2005), not the full market value of the properties in Washougal area which generally sell at \$30,000 to \$50,000 or more per acre. Similar negative net returns would occur if the land was planted to other grains such as oats or wheat.

Grass Hay Production

As an alternative to grain production, the 65 acres of relatively level ground on the MacDonald property could be over-seeded or replanted to grass for hay production. The 65 acres of hay would yield about two tons per acre. I have adopted a grass hay budget from the University of Nevada to estimate the returns from raising and selling native grass hay. At a sales price of \$85 per ton, the hay crop would return \$170 per acre. All costs, excluding land rental or mortgage interest, would result in per acre costs of about \$157 per acre—there is virtually no net profit in this enterprise and this is without including any land cost or operators labor in the costs.

My conclusion is that raising hay is not a commercial farming activity and that there is no long-term commercial agricultural significance from this use of the MacDonald – Washougal property, or from nearby property owners who produce grass hay.

Christmas Tree Production

Survey data shows that in 2005 there has been a slowdown in new plantings of Christmas trees in the heart of the traditional Christmas tree production areas of western Washington and Oregon (this based on telephone conversation with Bryan Ostlund, executive director of the Pacific Northwest Christmas Tree Growers Association and review of the most recent Christmas Tree survey data presented in Oregon Christmas Trees – 2005, press release dated August 8, 2006 by the USDA National Agricultural Statistics Service, Oregon Field Office). Clark County is not among the top counties in

western Washington for Christmas tree production, but the County is following the same trend of a recent slow down in new plantings. Significant new tree plantings did occur in Oregon from 2000 through 2004 and this will assure that supply continues to expand in the future. This will lead to downward pressure on prices received by growers unless demand for trees takes a significant upturn. The 2005 survey showed that the average grower price received in 2005 was 3 percent less than the average price received in 2001.

Landowners who initially are interested in growing Christmas trees are often discouraged to find that much of the cost is "up-front" while the revenue is delayed for five or more years until marketable trees are harvested. Access to hired labor is another key consideration as shearing and other cultural practices require many hours of labor per acre.

Adding to potential concern over the competitiveness for tree growers in Clark County is the rapid land price appreciation. With these conditions facing the county's current Christmas tree growers, it is very speculative to expect that the land owners in the vicinity of the MacDonald property will plant trees to expand production in the expectation that they would have profitable commercial ventures in the near future.

Wholesale Nursery

Wholesale plant nurseries are found in parts of rural Clark County. These operations can be profitable if the operators select an appropriate site and they have the skill and knowledge to successfully manage plant propagation, business operations and marketing functions. Much of the nursery stock sold at retail in Clark County comes from the large, well established nurseries that border Portland or are located in the Willamette Valley of Oregon.

It is important for plant nurseries to locate on superior soils. For further discussion see <http://gardencenternursery.wsu.edu/site/WholesaleNurserySiteSelection.html> a publication of Washington State University. In some cases, these nurseries gain an advantage if they have frontage on major roads where customers have easy access to the business. Access to a good supply of water is another key consideration. The frequency of winter high winds and freezing conditions may be neutral or unfavorable, depending on the types of nursery stock produced. Other open land sites are preferable to the MacDonald – Washougal property for establishing a nursery operation in Clark County.

Berry Crop Production

Clark County has historically been a significant production area for strawberries, raspberries and blueberries. There has not been any evidence that berries have ever been a crop in the Mount Norway area. Berries generally do best in areas that are better protected from winds and frequent winter freezing conditions. Since production of berries has been in decline in Clark County and other areas of the county are more favorable to berries, there is no reason to believe farmers would be attracted to this site to establish berry production.

Criteria for Agriculture Resource Lands Re-Classification

Under WAC 365-190-050, the Department of Community, Trade, and Economic Development has established additional evaluation criteria to evaluate the appropriateness of agricultural resource land classification. In this section these criteria are addressed.

Availability of Public Services and Facilities

The MacDonald – Washougal proposed development is in a growing area of Clark County that is close to the current Urban Growth Boundary of Washougal and is in close proximity to public services. Sanitary sewer, storm water, and potable water lines would be constructed and connected to existing services which are available within the city boundary of Washougal. These services are all currently within one to two miles of the MacDonald property. As the UGB is expanded these services would be extended to the subject property.

Tax Status

The MacDonald property is in agricultural/farm use tax designation. Out of 11 parcels that surround the MacDonald property, two are in agricultural or farm use taxation and two are in timber or forest use tax status. One of the two parcels that are in agricultural or farm use tax designation has a small Christmas tree planting with a rural home in an R-5 zone. The other agricultural use designation parcel is 39 acres and is pastured or cut for hay.

Relationship or Proximity to Urban Growth Areas and Intensity of Nearby Land Uses

The MacDonald property is about one quarter mile north of the current Washougal Urban Growth Boundary. Land uses in this area are mixed and include home sites on small to medium size acreages, open space and vacant lands, and some agriculture uses.

Predominant Parcel Size

The MacDonald property consists of one parcel of 79 acres. Eleven parcels surround the MacDonald property. Along the northern boundary of the MacDonald property there are two parcels of 5.9 and 5.0 acres, respectively. Along the eastern boundary there are four adjoining properties ranging from 2.5 to 20.0 acres. There is one 40.25 acre parcel adjoining at the southern boundary. Along the western boundary there are four parcels ranging from 4.75 acres to 38.7 acres. The average parcel size of all 11 adjoining parcels is 12.5 acres.

Land Use Settlement Patterns and their Compatibility with Agricultural Practices

The rapid expansion of the urban area of Washougal and Clark County has changed the intentions of land owners, who anticipate that more intensive development will occur when the Washougal UGB expands. Much of the land near the MacDonald property is in small acreages with home sites, which are often incompatible with agricultural practices that create dust, noise, spraying or odors. Locating a residential development or a business park on this site is compatible with the surrounding character of the area.

SE Jennings Road/SE 352nd Avenue is an arterial road that forms part of the western boundary of the subject property and extends south to 32nd Street in Washougal. Thirty second street in turn leads directly to a main intersection with Highway 14. The access to

Highway 14 makes this site well suited for residential development or an employment center/business park, and not for agricultural usage.

History of Land Development Permits Issued Nearby

Owners of the MacDonald property make a preliminary application to Clark County for development in 1998. There are several other preliminary development applications (PAC) on surrounding properties.

Land Values under Alternative Uses

Farmers will often pay more for land than its capitalized value to produce crops or livestock. However the price premium still generally results in land prices of under \$10,000 per acre. Prices that land developers will pay depend on many factors such as the size of the parcel, zoning and other factors. The market for open land in this area that is in close proximity to the Urban Growth Boundary of Washougal ranges from \$25,000 to \$50,000 or more per acre. At these prices there is no opportunity to attract farmers who intend to operate long-term commercial agricultural enterprises to locate here.

Proximity to Markets

The land within and near the proposed MacDonald – Washougal proposed development is close to the Vancouver-Portland metropolitan area. However, looking more broadly across the County, crops and related production enter many different processing and distribution systems. Not all products are sold to local buyers for local markets. Close proximity to a metropolitan market does not guarantee local market access.

Conclusions

Changing the Comprehensive Plan and rezoning the MacDonald – Washougal property to an urban density designation from agriculture (AG-20) will not diminish agricultural production or the existing agricultural industry in Clark County. For all of the reasons stated in this report, the MacDonald – Washougal property does not meet the criteria of agricultural land as defined by the GMA. Revision of the UGB to include this property and its subsequent rezone should not be denied on the basis that this property is productive agricultural land on either an historical, current or future basis. There is also no reason to expect that the MacDonald – Washougal property will be converted to agricultural use in the future because it has no apparent commercial agricultural potential. These conclusions are also true for the other land in the vicinity of the MacDonald – Washougal property.

Sincerely,



Bruce A. Prenguber

Attachment 1: Curriculum Vita for Bruce Prenguber

Professional Experience: *President, Globalwise, Inc.*

1996 -- Present

- Developed and currently manage a successful, diversified economic and marketing consulting practice with a portfolio of over 40 clients.
- Analyzed economic damages and lost earnings capacity for the clients of attorneys in the Pacific Northwest and testified in court or gave depositions as required.
- Managed projects for clients that have resulted in new business formation, on-going new product sales, based on recommendations for objective management decision-making.

Executive Director, Western U.S. Agricultural Trade Association

2000 -- 2002

- Managed 13 member state export program in cooperation with private companies. Improved overall federal funding for states and companies despite declining availability of federal funding.
- Led the staff in development and implementation of a project tracking and reporting system that provided new management information and documented credible results for the largest number of companies assisted in the history of the association.
- Evaluated and proposed projects in new federal programs that resulted in \$600,000 of new program funding to the association.
- Increased association reserve funds by 15 percent and led the Board to adopt new reserve fund investment policies.

Assistant Director, Western U.S. Agricultural Trade Association

1980 -- 2000

- Initiated and managed international market development programs in 10 countries that introduced over 100 U.S. companies to importers and distributors. These programs had sales of over \$10 million for U.S. companies.
- Managed program reviews and evaluation contracts that led to elimination of low performing activities

and additional funding and management support to high success programs.

*Officer and Principal, Northwest Economic Associates
1978 -- 1996*

- Proposed and managed over 100 economic and marketing consulting projects with a total contract value in excess of \$2.5 million.

Education: University of Wisconsin
Madison, Wisconsin
M.S.--Agricultural Economics, 1975

Washington State University
Pullman, Washington
B.S.--Agricultural Economics, 1973

Professional Associations: Member, National Association of Business Economics

Teaching: Adjunct Instructor of Economics, Washington State
University-Vancouver, WA Branch Campus, 2005

Other Activities: Member, Northwest Foods Processors Association
Member, Friends of Washington State University—School of
Economic Sciences

Publications

- “Economic Impacts of Food Plant Closure: Analysis of the J. R. Simplot Plant in Hermiston, Oregon” for Oregon Food Processors Council, September, 2004.
- “Economic Impacts of Food Plant Closure: Analysis of the Pacific Coast Seafood Plant in Warrenton, Oregon” for Pacific Seafood Group, Portland, Oregon, February, 2004.

- "Economic Impacts of Food Plant Closure: Analysis of the Seneca Plant in Dayton, Washington" for Washington Food Processors Council, Olympia, Washington, September, 2003.
- "Personal Consumption Greatly Impacts Economic Damage Calculations" in Oregon Casualty Adjusters Association Newsletter, February, 2004.
- "Value-Added Agriculture and U.S. Competitiveness: A Western U.S. Viewpoint"
Analysis and speech presented at the USDA Agricultural Outlook Forum 2002, February 21, 2002, Washington, D.C.
- "Crops and Marketing Opportunities For Agricultural Producers at the Former Wind River Nursery, Skamania County, Washington" analysis presented in "Wind River Nursery Site and Facility Plan" for Skamania County Wind River Redevelopment Team, Stevenson, Washington, June 1, 2000.
- "Implications of Changes in the Food Supply Chain for Small and Medium-Sized Produce Firms in the Pacific Northwest" for USDA Agricultural Marketing Service, Washington, D.C., May 2000.
- "Market Analysis for Metlakatla Native Plant Seed Enterprise" for Metlakatla Indian Community, Metlakatla, Alaska, September 1998.

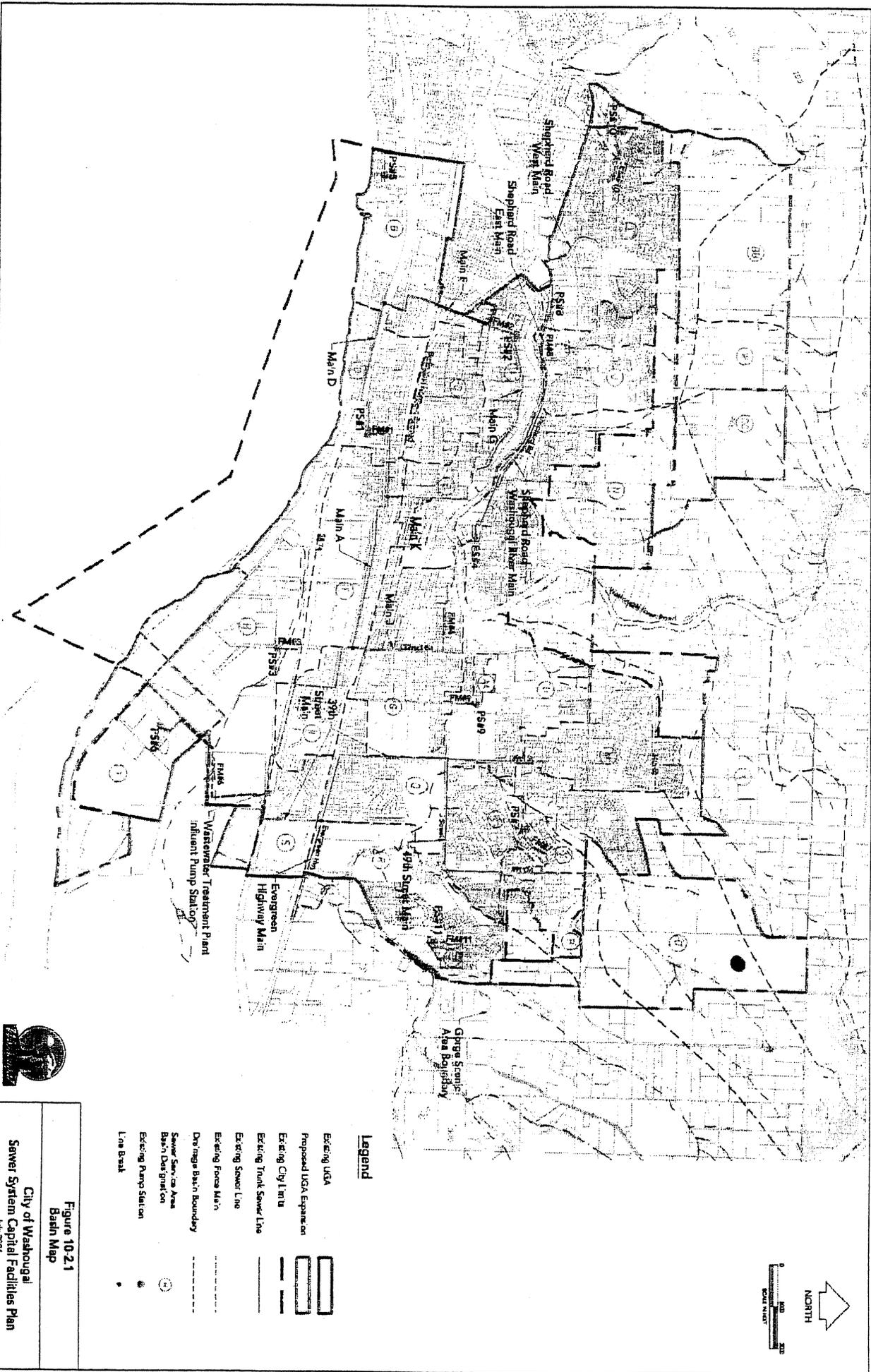
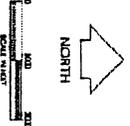
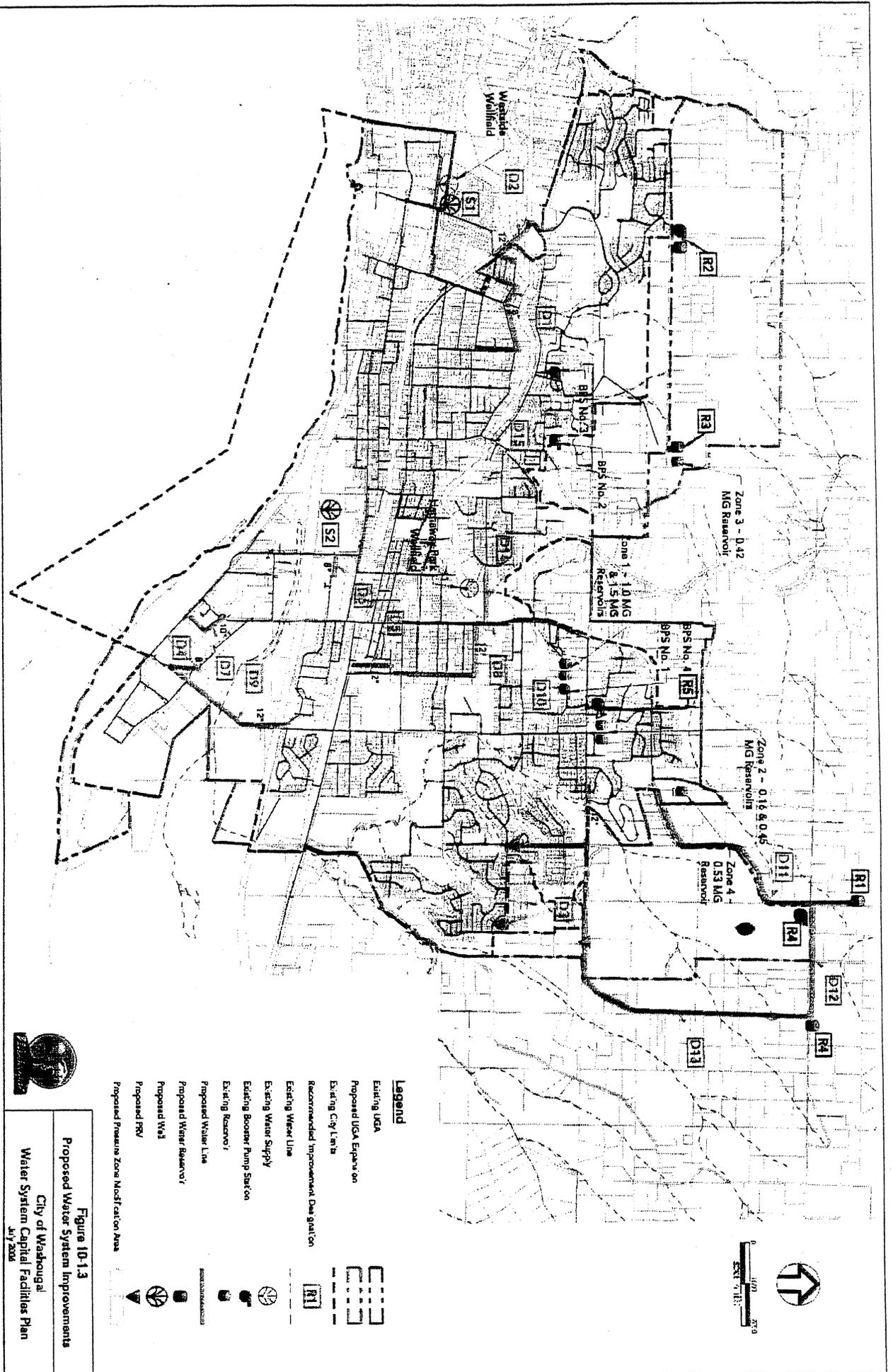


Figure 10-2.1
Basin Map
 City of Washougal
 Sewer System Capital Facilities Plan
 July 2008

- Legend**
- Existing USA
 - Proposed USA Expansion
 - Existing City Limits
 - Existing Trunk Sewer Line
 - Existing Sewer Line
 - Existing From Main
 - Drainage Basin Boundary
 - Sewer Service Area Basin Designation
 - Existing Pump Station
 - Line Break





- Legend**
- Existing USA
 - Proposed USA Engineer on
 - Existing City Limits
 - Recommended Improvement District
 - Existing Water Line
 - Existing Water Supply
 - Existing Booster Pump Station
 - Existing Reservoir
 - Proposed Water Line
 - Proposed Water Reservoir
 - Proposed Wall
 - Proposed RW
 - Proposed Pressure Zone Modification Area



Figure 10-13
Proposed Water System Improvements
 City of Washougal
 Water System Capital Facilities Plan
 July 2008

LANDERHOLM, MEMOVICH, LANSVERK & WHITESIDES, P.S.

ATTORNEYS AT LAW

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Randall B. Printz

October 2, 2006

Marty Snell, Director of Long Range Planning
Clark County Community Development
P.O. Box 9810
Vancouver, WA 98668-9810

Re: Narrative for McDonald Property – Draft EIS Comments

Dear Mr. Snell:

On behalf of MacDonald Properties, we are submitting comments related to the Draft EIS Plan for parcel 129825-000, totaling approximately 78 acres. The subject property is located at the southeast corner of the intersection of SE 352nd Avenue and 20th Street in Washougal, Washington. The comprehensive plan designation on the parcel is Agriculture (AG) with an Agricultural – 20 (AG-20) zoning designation. We support the City of Washougal's request that the property be included in Washougal's UGB.

Surrounding properties are currently zoned Agricultural-20 with the average parcel size of the 11 adjoining lots at 12.5 acres. The current proposed UGB includes property east of this site for industrial growth and also includes high density residential to the west and low density residential to the south. There is also a small commercial element directly west. The EC zoning would provide for anticipated employment and jobs for the proposed surrounding residential zones.

When deciding on parcels to include in the various UGB's, Staff often requests that the Applicant address the 20 year Comprehensive Growth Management Plan Policies, the Unified Development Code, and address Clark County Criteria for Map Changes.

The criteria to be analyzed for Comprehensive Plan Amendment applications are found at CCC 40.560.010. These criteria include the following:

Criteria for All Map Changes (CCC) 40.560.010 (G)

- (1) *The proponent shall demonstrate that the proposed amendment is consistent with the Growth Management Act and requirements, the county wide planning policies, the community framework plan, comprehensive plan, city comprehensive plans, applicable capital facilities plans and official population growth forecasts.*

A. **Growth Management Act**

Agricultural land is defined by the GMA as “land primarily devoted to the commercial production of horticulture, viticulture, floriculture, dairy, apiary, vegetable, or animal products or of berries, grain, hay, straw, turf, seed, Christmas trees or livestock, **and** that has long-term commercial significance for agricultural production” (WAC 365—190-050). As noted in the 2004 Comprehensive Plan, quality soils are a primary factor in classifying and designating agricultural resource lands. DCTED provides 10 indicators to assess these factors; however, it is left up to the local jurisdictions to interpret these guidelines in the designation of resource lands:

- the availability of public facilities,
- tax status
- the availability of public services
- relationship or proximity to urban growth areas
- predominant parcel size
- land use settlement patterns and their compatibility with agricultural practices
- intensity of nearby land uses
- history of land development permits issued nearby
- land values under alternative uses, and
- proximity to markets

In adopting the 1994 Comprehensive Plan, the County created a “Farm Focus Group”. The purpose of the group was to make recommendations on agricultural lands to the commissioners. The group split on whether there was ANY land within Clark County that met the GMA agricultural land criteria. The criterion of “long term commercial significance” was the primary factor in this debate.

In an attempt to satisfy the GMA obligation of identifying resource lands (including agriculture), Staff recommended, and the Commissioners ultimately adopted, a Comprehensive Plan containing agricultural land. **These designations were made with little or no site specific analysis; but rather the designations were primarily based on generalized soil types, parcel size and proximity to larger parcels.** In this case, the Applicant can demonstrate that not withstanding the County’s “broad brush” agricultural designation in 1994, this property does not meet the statutory test for agricultural land under the GMA.

Bruce Pengruber, an agricultural economist, has prepared an agricultural analysis of the McDonald property, submitted as part of the DEIS comments. In his analysis, Mr. Pengruber studies not only the 20 acre parcel in question, but analyses surrounding properties, their agricultural history and their economic success or failure. His conclusion for this 20 acre property is that it fails to meet both elements of the GMA definition of agriculture: it has not been producing agricultural products in recent times and it does not have significant commercial agricultural potential for the future. We encourage you to take a close look at this study as it is very detailed and analysis the property at many levels.

The following GMA goals support the Comprehensive Plan Amendment:

- Goal One "Urban Growth"
- Goal Two "Reduce Sprawl"
- Goal Three "Transportation"
- Goal Five "Economic Development"

Goal One and Two encourage the reduction in the inappropriate conversion of undeveloped land into sprawling, low density development. These goals relate to concentration of development within the urban growth boundary and to the sizing of urban growth boundaries and the desire to create compact, efficient urban growth within them. The granting of this request will not adversely impact these goals because the land will be developed at urban densities, rather than chopped into 1 or 2.5 acre lots as occurred prior to the adoption of the 1994 Comprehensive Plan. Additionally, the land is in close proximity to the existing UGA and is needed to accommodate the 20 year growth projection for Washougal.

Goal Three of the GMA encourages efficient, multi-modal transportation systems that are based on regional priorities and coordinated with county and city comprehensive plans. This application will encourage the efficient uses of the transportation system given it's accessibility to Jennings Road. Some additional infrastructure would be needed to service this parcel for transportation purposes, as would some of the surrounding properties proposed to enter the UGB in this area of Washougal. This presents a good opportunity to master plan circulation in this area to create an efficient transportation network. The same can be said for the provision of sewer and water facilities.

Goal Five encourages economic development throughout the state that is consistent with adopted comprehensive plans. Due to soil types that have little history of use for any agricultural purposes other than pasture or hay production, this property has little economic value as agricultural land. If brought into the UGA and provided urban zoning its assessed value would increase significantly; thus providing an economic benefit to the county.

Goal Eight addresses Natural Resource industries and encourages the conservation of productive agricultural lands, discouraging incompatible uses. As discussed throughout this narrative, this parcel is not productive agricultural land and does not meet the statutory test for Agricultural Lands provided for in the GMA. By following the proposed zoning for the UGB area, no incompatible uses will be created given that the property would be surrounded with high density residential, and employment uses.

B. Clark County Comprehensive Plan Criteria

The proposal complies with specific goals and policies of the Clark County's 20-Year Comprehensive Growth Management Plan. Following are several of the specific goals and policies of the Plan and how the proposal will further implement the Plan.

Economic Development

9.1.1 The county and cities will demonstrate their commitment to long-term economic growth by promoting a diverse economic base, providing opportunity for all residents, including unemployed and disadvantaged person.

9.1.8 The county and cities will provide for orderly long-term commercial and industrial growth and an adequate supply of land suitable for compatible commercial and industrial development.

9.1.9 The county and cities will encourage the recruitment of new business employers to absorb the increasing labor force, and to supply long-term employment opportunities for county's residents who are currently employed outside of the State.

Agriculture Policies

3.4.1 Encourage the conservation of the county's highest quality agricultural lands for productive agricultural use and protect the opportunity for these lands to support the widest variety of agricultural crops and products as listed in (RCW 36.70A.030(2)) by designating agricultural lands of long-term commercial significance.

3.4.2 In order to conserve commercial agricultural lands, the county shall limit residential development in or near agricultural areas and limit public services and facilities, which lead to the conversion of agricultural lands to non-resource uses.

3.4.12 Residential development on lands adjacent to agricultural land shall be located away from the agricultural land and shall provide a buffer between residential and agricultural activity.

This land has not been used for agricultural uses nor will it likely do so in the future. The property is not high quality agricultural land, nor is it commercially viable as agricultural land. Any development that occurs on the property pursuant to its adoption in the UGB will no longer be surrounded by adjacent agricultural activity, as most of the surrounding property is proposed to come into the UGB with industrial, employment center and residential uses.

- (2) *The proponent shall demonstrate that the designation is in conformance with the appropriate locational criteria identified in the plan.*

Agriculture Lands

These lands have the growing capacity, productivity, soil composition, and surrounding land use to have long-term commercial significance for agriculture and associated resource production. This designation is implemented by the Agriculture (AG-20) base zone.

In response to item (2) above, it is first important to point out that the current designation is not in conformance with its own locational criteria. The site is made up of two soil types. These soil types, Hesson clay loam 0-8% slopes (HcB) and Hesson clay loam 8-20% slopes (Hcd) are not conducive to agricultural purposes other than pasture or hay production. Again, they do not meet the GMA mandated statutory test for Agricultural Land. Regardless of whether this property was brought into the UGA, it should not be designated as Agricultural Land.

Clark County – Employment Center

Areas within this designation are implemented with Office Campus (OC) and Business Park (BP) base zones and are intended to provide the community with a compatible office and attractive new non-polluting industries. Office and Business Park areas are designated for more intensive job related land uses that pay family wages, such as professional offices, research and technology related industries located in a campus like setting. Business Park areas may also be targeted by special public and/or private incentive programs that provide up front public service improvements or other inducements to attract family wage employment where higher job densities are encouraged.

The subject parcel complies with the Employment Center / Business Park locational criteria above. Again, assuming the adjacent proposed zoning for Washougal's new UGB, EC/BP responds to the neighboring LI, UH and UL zones with the provision of jobs.

- (3) *The map amendment or site is suitable for the proposed designation and there is a lack of appropriately designated alternative sites within the vicinity.*

Both the map amendment and site are suitable for the EC/BP designation. There are other more appropriately designated Agricultural properties in southwest Washington.

- (4) *The plan map amendment either: a) responds to a substantial change in conditions applicable to the area within which the subject property lies; b) better implements applicable comprehensive plan policies than the current map designation; or c) corrects an obvious mapping error.*

This request better implements applicable comprehensive plan policies than the current map designation due to the fact that the parcel does not meet the GMA criteria for agricultural land.

- (5) *Where applicable, the proponent shall demonstrate that the full range of urban public facilities and services can be adequately provided in an efficient and timely manner to serve the proposed designation. Such services may include water, sewage, storm drainage, transportation, fire protection and schools. Adequacy of services applies only to the specific change site.*

This criteria is only applicable to designations within the UGB because the GMA prohibits extension of those urban services beyond the UGB. However, the City of Washougal has adopted updated Capital Facilities Plan dated July 2006 for both sewer and water. These plans are attached to this letter and indicate drainage basin boundaries that have been identified to serve this site and sewer service areas. An existing water booster pump station exists in the near vicinity of the parcel and proposed water lines surround the north boundary and a portion of the western boundary of this parcel.

Rezone Criteria (CCC 40.560.020(H))

The proponent must also comply with the requirements of CCC 40.560 (Plan and Code Amendments) and case law in order to be granted a request for rezone that accompanies the Comprehensive Plan Amendment application. Following is a brief discussion of the proposal's compliance with the cited code section and case law. CCC 40.560.020 sets specific criteria that must be met in order to approve a zone change as follows.

- (1) *Requested rezone is consistent with the Comprehensive Plan designation.*

The proposal is not consistent with the current Comprehensive Plan designation and therefore a Comprehensive Plan Amendment has been proposed and is discussed in detail in this document.

Marty Snell, Director of Long Range Planning
Draft EIS Comments – Washougal Property
October 2, 2006
Page 7

Approval of the Comprehensive Plan Amendment to an EC/BP designation would allow the proposed rezone of the parcel zoned AG-20 to be consistent with the Plan designation.

(2) ***The request zone change is consistent with the plan policies and locational criteria, and the purpose statement of the zoning district.***

As discussed previously in this document, this request complies with the comprehensive plan policies and locational criteria set forth for the EC/BP Designation.

(3) ***The zone change either: a. Responds to a substantial change in conditions applicable to the area within which the subject property lies; b. Better implements applicable comprehensive plan policies than the current map designation; or c. Corrects an obvious mapping error.***

The proposed rezone better implements applicable comprehensive plan policies than the current map designation of Agriculture. This criteria and how the proposal complies is discussed earlier in this narrative.

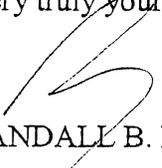
(4) ***There are adequate public facilities and services to serve the requested zone change.***

This criteria and how the proposal complies is discussed elsewhere in this document.

As demonstrated throughout this document, the requested Comprehensive Plan Amendment and Rezone further the goals and policies of the County's Comprehensive Plan, comply with the applicable zoning ordinance locational criteria and purpose statements, and capital facility elements.

We ask that you consider our request with a recommendation to the Clark County Board of Commissioners to rezone this parcel from AG (Agriculture) to Employment Center / Business Park (EC/BP).

Very truly yours,



RANDALL B. PRINTZ

RBP\kf

c: Client

APPENDIX 3

Exhibit 6548



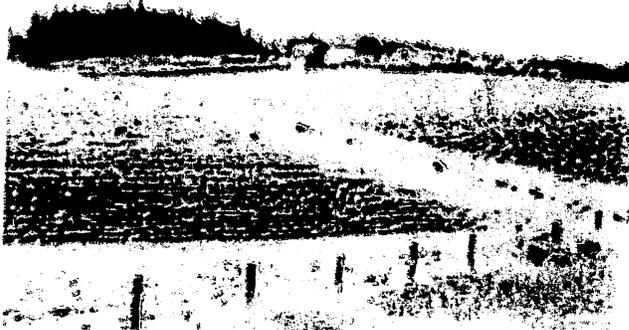
Proud past. Promising future.

LARK COUNTY
WASHINGTON

COMMUNITY PLANNING

Community Planning Staff Report

Analysis: Bringing Resource Lands into UGAs
May 21, 2007





proud past, promising future

CLARK COUNTY
WASHINGTON

COMMUNITY PLANNING

TO: Board of County Commissioners
Clark County Planning Commission

FROM: Marty Snell, Director, Community Planning
Prepared by: Gordy Euler, Planner III

DATE: May 21, 2007

SUBJECT: Bringing Resource Lands into UGAs

Introduction

Clark County is in the process of updating its comprehensive plan. Part of the plan update includes a proposal to expand urban growth boundaries around each of the cities. The Preferred Alternative presented in the final EIS analyzes urban growth boundary expansions of 12,063 acres. Of this, 4,727 acres are designated as resource (agriculture and forest) lands. The purpose of this staff report is to present information to be used by the Planning Commission and the Board of County Commissioners (Board) in determining whether or not these resource lands should be brought into UGAs. Resource lands in each UGA are broken out by subarea and are shown in Attachment A.

Background

The Growth Management Act (GMA) requires that each county shall designate where appropriate "agricultural lands that are not already characterized by urban growth and that have long-term significance for the commercial production" (RCW 36.70A.170). RCW 36.70A.060 requires that counties "...develop regulations to assure the conservation of agriculture, forest, and mineral resource lands...", and that "such regulations shall assure that the use of lands adjacent to agriculture, forest, and mineral resource lands shall not interfere with the continued use." The county has designated resource lands and development regulations to assure their conservation in the current comprehensive plan.

The Planning Commission and Board were presented a staff report on commercially viable agriculture on May 4, 2007. The staff report cites the two recent court cases regarding the criteria used by counties in the designation and de-designation of resource lands, information that is relevant to this exercise. Also cited in that staff report and attached (Attachment D) is a study done by Bruce Prenguber of Globalwise entitled "An Analysis of the Agricultural Economic Trends and Conditions in Clark County, Washington". This document characterizes the current state of agricultural operations in the county and provides some conclusions about the future. Both the court cases and the report are summarized below.

Court cases. The first decision, *Snohomish County v. Corinne Hensley et al.*, stated that soil types were the primary consideration in GMA when determining land's suitability for agricultural purposes. At this point it appeared that the courts were going to strictly interpret resource land suitability in terms of soil types.

Shortly after the *Snohomish County* decision, the State of Washington Supreme Court (Supreme Court hereafter) then issued the Lewis County decision (*Lewis County vs. Western Washington Growth Management Hearings Board*). The court stated that the designation of agricultural land need not be solely based on the physical character of the land (e.g., soil type). The Supreme Court further ruled that agricultural lands are those lands that:

- are not already characterized by urban growth;
- are 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
- have long-term commercial significance for agricultural production.

The last two criteria are also stated in the definition of "agricultural land" found at RCW 36.70A.030(2).

The Court emphasized the broad discretion counties have in making choices within the parameters set by the GMA and the implementing regulations issued by the Department of Community Trade and Economic Development. After the Supreme Court decided the *Lewis County* case, the Court of Appeals modified the *Snohomish County* decision to hold that soil types were a consideration but not the primary consideration in designating agricultural lands.

Globalwise Report Globalwise's report concludes that traditional agriculture is rapidly declining in Clark County, primarily due to increasing property values. "Niche agriculture," the growing of land-intensive specialty crops, has replaced land-extensive traditional row crops such as corn and wheat. The county has also seen a decline in other agricultural uses such as dairy farms.

Discussion

In order to de-designate agricultural lands, the Board is required to make findings based upon the record that the lands do not meet one or more of the three bulleted criteria above. County staff prepared a matrix that includes information based on these criteria. The matrix is included as Attachment B.

- *Characterized by urban growth:*

Staff used the plain reading of "land already characterized by urban growth" as lands parcelized to urban levels with water and or sewer lines within the boundaries. Also noted was whether the sub area is adjacent to an urban growth area, an urban reserve area, or a rural center.

- *Primarily devoted to commercial production of agricultural products or capable of production:*
This criterion relates to whether or not the land is in production or is capable of being used. The matrix indicates whether the land is actually being farmed by referencing the maps included in the Globalwise Report regarding the 145 farms that were identified as commercial farms. The

percentage of land in the County's agriculture/farm current use program is also provided. Regarding capability, percentage of prime agricultural soils is indicated, as well as environmental constraints.

• *Having long-term commercial significance:*

This criterion considers the potential long-term commercial significance of land for agriculture based on growing capacity, productivity, and soil composition as well as proximity to population areas and the possibility of more intense uses of the land (RCW 36.70A.030(10)). The matrix indicates the land's soil types. With respect to proximity to population areas and the possibility of more intense use, the rest of the columns reflect the WAC criteria (WAC 365-190-050) that address this issue:

- Availability of public facilities;
- Tax status;
- Availability of public services (combined with public facilities);
- Relationship or proximity to urban growth areas;
- Predominant parcel size;
- Land use settlement patterns and their compatibility with agricultural practices;
- Intensity of nearby land uses;
- History of Land development permits issued nearby;
- Land values under alternative uses; and
- Proximity to markets.

The Preferred Alternative includes 155 acres of forest lands proposed for inclusion in the Camas UGA (Subarea CA-2). In order to de-designate forest lands, a similar finding to that for agricultural land has to be made by the Board. Included in the matrix (Attachment B) is information based on the WAC criteria for these forest lands.

Additional information

Attachment C is data provided by the Department of Assessment and GIS indicating the assessed value of parcels per acre and per zone without deductions for current use or senior exemptions. Those values highlighted in green are specifically the zones that are proposed for the resource lands discussed in this staff report and are utilized to address the "Land Values under Alternative Uses" criteria.

Attachment E and F includes information that was presented to the Board and Planning Commission in the previous staff report. Attachment E is the technical environmental information that was provided by GIS. Attachment F is a letter from a rural property owner stating that their farm can no longer sustain even one family wage job in farming, and that the owners would like their property included in the UGB.

Attachments:

- A: Agriculture Viability Study Areas-Preferred Alternative Maps (by UGA)
- B: Assessment of Resource Lands in the Preferred Alternative
- C: Assessed Value without Tax Deductions by County Zoning Classification
- D: Analysis of the Agricultural Economic Trends and Conditions in Clark County, Washington
- E: Agricultural or Forest Zoned Properties in Preferred Plan Urban Growth Boundary Expansion
- F: Letter from Rural Property Owner

ASSESSED VALUE WITHOUT TAX DEDUCTIONS BY COUNTY ZONING CLASSIFICATION

FREQUENCY	Area	Building Value	Land Value	Zoning	Total Acres	Land Value per Acre	Total Value per Acre
1855	68853418 32450	\$ 674,304,700	\$ 436,430,600	Community commercial	1359.36	\$ 322,473.48	\$ 820,709.41
20198	330177570 87700	\$ 3,307,718,100	\$ 1,836,608,100	R1-8	7279.83	\$ 242,301.62	\$ 678,895.73
18277	330665446 91200	\$ 3,095,131,800	\$ 1,687,066,100	R1-7.5	7561.03	\$ 218,295.43	\$ 626,030.03
404	15186941 70680	\$ 96,419,200	\$ 87,550,100	Limited commercial	348.84	\$ 251,115.89	\$ 527,670.60
683	16240598 94370	\$ 116,138,600	\$ 72,858,000	R-12	372.87	\$ 195,347.57	\$ 505,736.34
32	837954 87898	\$ 5,685,800	\$ 4,485,600	Light industrial	20.84	\$ 214,236.82	\$ 487,006.09
573	88639377 57780	\$ 476,680,000	\$ 289,252,500	Highway commercial	1568.70	\$ 186,416.64	\$ 465,886.62
7802	291373374 85600	\$ 1,582,085,000	\$ 862,455,700	R1-10	5311.60	\$ 162,972.06	\$ 462,108.32
380	28330715 97180	\$ 144,156,900	\$ 129,435,500	Community commercial	650.38	\$ 199,074.04	\$ 470,687.65
21	724298 38064	\$ 3,255,300	\$ 3,561,300	Neighborhood commercial	16.63	\$ 214,180.01	\$ 409,666.86
7065	118158949 95700	\$ 585,313,700	\$ 290,376,890	Light industrial	2712.56	\$ 107,048.90	\$ 322,069.16
1	36806 82813	\$ 132,400	\$ 94,800	OR-43	0.64	\$ 172,193.63	\$ 264,365.30
8	279274 12744	\$ 67,400	\$ 1,573,400	OR-18	8.41	\$ 246,412.28	\$ 224,196.31
116	40018526 12430	\$ 229,670,400	\$ 22,554,800	Heavy industrial	1125.31	\$ 20,043.18	\$ 215,145.06
7	48369 61983	\$ 102,200	\$ 136,700	OR-15	1.11	\$ 123,107.27	\$ 213,073.31
6	10326976 73440	\$ 60,971,900	\$ 18,023,900	University	367.93	\$ 46,927.47	\$ 208,302.43
85	5532327 43457	\$ 9,418,700	\$ 17,036,700	Neighborhood commercial	127.00	\$ 134,157.86	\$ 203,273.79
344	94416866 39910	\$ 311,310,200	\$ 129,288,800	Heavy industrial	2187.62	\$ 59,648.40	\$ 194,432.52
228	103866 76 40000	\$ 23,235,800	\$ 23,140,200	Rural comm.-inside rur.centers	238.52	\$ 67,018.28	\$ 193,681.85
38	1826408 94971	\$ 4,135,800	\$ 3,969,800	Rural comm.-outside rur.center	41.97	\$ 95,066.35	\$ 181,308.52
287	14761892 96200	\$ 38,676,200	\$ 26,241,500	R-16	359.36	\$ 77,329.73	\$ 174,456.42
5	261824 83203	\$ -	\$ 1,129,100	OR-27	6.47	\$ 33,439.63	\$ 189,106.36
2117	232244088 26100	\$ 723,319,400	\$ 178,254,400	R-30	5331.59	\$ 33,439.63	\$ 151,404.25
516	83026588 97970	\$ 127,344,000	\$ 91,721,600	R1-20	1448.89	\$ 63,382.11	\$ 149,031.89
1152	182508183 35500	\$ 372,302,600	\$ 255,876,100	Light industrial	4189.77	\$ 61,071.46	\$ 138,883.30
4537	393172368 35600	\$ 853,350,000	\$ 306,327,100	R-22	8026.00	\$ 34,270.88	\$ 130,157.79
463	102922776 86700	\$ 150,057,900	\$ 157,429,300	Mixed use	2362.78	\$ 66,828.78	\$ 125,000.66
100	39148281 58280	\$ 68,457,100	\$ 43,883,800	Heavy industrial	806.72	\$ 48,828.18	\$ 115,659.83
68	8738074 74318	\$ 13,348,400	\$ 9,834,700	Gorge residential 5	200.60	\$ 48,026.76	\$ 105,513.09
2	1733651 28000	\$ -	\$ 4,580,400	Mining lands	39.80	\$ 115,087.67	\$ 83,162.93
1878	238176071 07100	\$ 287,994,100	\$ 278,824,800	Urban reserve-10	5467.76	\$ 51,012.75	\$ 70,458.32
7546	823830635 10500	\$ 1,120,514,300	\$ 542,004,320	R-18	18912.55	\$ 28,858.45	\$ 63,911.33
816	114411629 31700	\$ 132,652,700	\$ 85,777,200	Rural centers - 1 ac minimum	2826.53	\$ 32,858.00	\$ 83,162.93
17726	3304521900 78000	\$ 2,640,401,600	\$ 2,704,804,250	Rural-5	75881.38	\$ 36,651.92	\$ 48,828.18
271	48503746 89550	\$ 40,042,200	\$ 30,589,850	Rural centers - 2.5 ac minimum	1116.79	\$ 27,424.42	\$ 53,911.33
893	102721196 54100	\$ 88,974,600	\$ 44,934,200	R1-43	2358.15	\$ 18,064.82	\$ 81,026.03
55	4832356 69079	\$ 2,972,200	\$ 3,108,400	Neighborhood commercial	106.34	\$ 29,229.59	\$ 61,886.41
150	34403204 21040	\$ 13,590,100	\$ 20,462,600	Office campus	769.79	\$ 36,570.50	\$ 57,178.44
86	62802240 03580	\$ 29,011,100	\$ 34,003,300	Parks/OS	1214.47	\$ 27,990.51	\$ 51,282.75
88	20322181 47900	\$ 10,290,900	\$ 13,034,200	Gorge residential 10	466.69	\$ 29,224.51	\$ 43,816.26
3182	567728943 69600	\$ 335,484,700	\$ 226,525,700	R1-6	12803.89	\$ 17,614.11	\$ 36,512.34
136	62828367 62600	\$ 15,983,300	\$ 36,512,300	Business park	1437.76	\$ 25,395.43	\$ 35,899.07
1	283329 31250	\$ -	\$ 233,500	Gorge SMA non-federal forest	6.60	\$ 35,899.07	\$ 34,512.63
48	12648115 84230	\$ 3,707,100	\$ 6,233,200	Airport	288.02	\$ 21,641.61	\$ 29,801.01
4	1657874 88063	\$ 178,800	\$ 887,000	Employment campus	35.76	\$ 24,601.56	\$ 31,789.19
2848	888309210 75800	\$ 291,878,000	\$ 427,657,380	Rural-10	22642.54	\$ 18,887.34	\$ 27,862.06
2962	1623186288 36000	\$ 438,858,300	\$ 689,273,200	Agriculture-20	37263.28	\$ 18,082.14	\$ 26,728.25
15	1898642 79047	\$ 280,000	\$ 885,000	Gorge SMA federal forest	43.69	\$ 20,304.29	\$ 24,728.47
12	8457607 84922	\$ 1,409,800	\$ 2,550,200	Gorge small woodland 40	148.24	\$ 17,202.72	\$ 24,690.31
731	345128657 76200	\$ 76,924,800	\$ 118,964,100	Rural-20	7823.06	\$ 15,143.86	\$ 20,830.96
19	5442727 30957	\$ 546,900	\$ 2,538,100	Urban reserve-20	124.95	\$ 20,297.27	\$ 15,152.47
37	26001348 35180	\$ 4,601,500	\$ 7,713,300	Gorge small-scale agriculture	596.91	\$ 12,922.07	\$ 15,612.94
11	10648890 11720	\$ 1,303,200	\$ 2,719,800	Gorge SMA agriculture	249.05	\$ 10,819.82	\$ 13,881.38
14	10341380 36580	\$ 1,098,400	\$ 2,607,200	Gorge small woodland 20	237.41	\$ 10,982.08	\$ 10,975.10
89	8808336 117970	\$ 7,185,200	\$ 14,192,200	Gorge large-scale ag 40	1582.57	\$ 9,062.88	\$ 8,447.71
4018	2881735722 08000	\$ 259,362,900	\$ 411,271,090	Forest tier II-40	61106.04	\$ 6,730.56	\$ 6,657.26
278	514704407 79500	\$ 9,443,800	\$ 102,190,400	Parks/Wildlife refuge	11815.99	\$ 8,301.47	\$ 7,712.11
40	20083131 08610	\$ 2,900	\$ 3,842,400	Water	461.05	\$ 8,301.47	\$ 5,153.14
28	50817341 74900	\$ 1,648,800	\$ 7,365,800	Gorge large-scale ag 60	1168.90	\$ 4,263.81	\$ 4,263.91
1538	5576444288 31000	\$ 108,309,050	\$ 651,838,890	Forest tier I-60	128017.56	\$ 5,153.14	\$ 4,263.91
4	48538849 62800	\$ -	\$ 4,555,500	Gorge SMA open space	1068.38	\$ 4,263.81	\$ 4,263.91
4537	393172368 35900	\$ 853,350,000	\$ 309,327,100	R-22	8026.00	\$ 34,270.88	\$ 136,893.36
88	142938296 62000	\$ 2,200,600	\$ 11,488,600	Agriculture/Wildlife	3281.41	\$ 3,601.11	\$ 4,171.74

NOTE: [] : These zones proposed for land included in the Preferred Alternative

*Analysis of the Agricultural
Economic Trends and Conditions in
Clark County, Washington*



Prepared for Clark County, Washington
By Globalwise, Inc.

April 16, 2007

Preliminary Report

Attachment D

Acknowledgements

Many people were contacted during this analysis and their time and perspectives are gratefully acknowledged. The full list of contacts is at the end of the report in Appendix E.

Photographs used in this report are from several sources. Charles Brun, Clark County Extension Office, generously offered photos from his extensive digital photo library. Historical photos are from the archives of the Clark Conservation District, and include one from Al Monner. Staff at the County also generously shared photos.

Many staff in the departments of Community Planning and Assessment and GIS have been very helpful during the course of this analysis. Their assistance with retrieving data and assisting with the GIS maps, data tables and related information collection is greatly appreciated.

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Executive Summary

Clark County has grown and changed remarkably in the last 50 years. One industry that has not shared in that growth is agriculture. In fact, agriculture in Clark County has been in general decline for decades. This report documents many of the changes, assesses current conditions and evaluates the effects of the expansion of the county's Urban Growth Boundaries on agriculture.

The county's traditional agricultural enterprises include dairy, cattle, fruit and vegetable production. All of these sectors are in decline. The most promising sector is plant nurseries. Christmas tree production has probably reached its plateau. Small scale livestock operations such as sheep and goat farms are found in small numbers throughout the county, as are diversified fruit and vegetable operations which generally engage in direct marketing. Food processing in the county is not linked to county production, except for the lone remaining milk bottling plant.

As the overall economy of Clark County increases, agriculture is a shrinking share. In 2004, agriculture employment accounted for about one percent of the county's total employment. Local agriculture also does not contribute very significantly to local food manufacturing. The analysis of the Clark County economy for 2004 showed that less than four percent of the county's food processing is contributed from within the county when measured by the value of county raw product inputs as a percentage of the value of output (Table 15).

Economic data from the Bureau of Economic Analysis shows that total farm income in Clark County has been steadily declining. During the period of 1969 to 2004, farm income peaked in 1973 at \$41.8 million and was lowest in 2002 at \$6.3 million (all in 2004 dollars, see Figure 1). Farm income rebounded somewhat in 2003 and 2004 from the low in 2002. In 2004 the average Clark County farm proprietor's income was \$10,560 (Figure 2). This reveals the part-time nature of farming in the county.

Lack of income and profit by farmers in Clark County has led to reduced land area in commercial farming. Reliable estimates are not available of how much commercial farm land has gone out of production over time. The one long term source of data on farmers and farm land is the U.S. Census of Agriculture and it is not limited to tracking commercial farming. This data source reports a mix of commercial agriculture with land owners who conduct non-commercial agricultural activities.

For this analysis, farms in Clark County were identified that are now actively engaged in commercial sales of farm and agricultural products. This study has identified 145 farms with 3,115 acres in production. Some of these farms are also leasing or renting additional land for their operations and this acreage is not reflected in the total.

The 2002 Agriculture Census reports that there were 1,596 farms with 70,694 acres. However, over half of these farms had sales of less than \$2,500. Much of what the Agriculture Census is reporting is rural acreages that are comprised of the land area associated with the homes of rural residents who combine non-commercial agricultural

activities with their rural lifestyle. The 2002 Agriculture Census does report 170 farms with gross income of \$25,000 or more.

Much more land is in the current use farm and agriculture program than is commercially farmed. As of 2006 there is a total of about 48,450 acres in these designations in the county. Over 95 percent of the acreage was placed in the program from the time the program began in the early 1970's through 1993. The remaining five percent (2,150 acres) are parcels that were placed in the current use program after 1993. The acreage being placed in current use for farm and agriculture designation is declining rapidly.

Based on analysis of the most active farms currently in Clark County, about 28 percent of the land (868 acres) in these farms is within the cities' incorporated areas, adopted UGAs and Preferred Alternative UGA boundary. Inevitably, some or even most of this land will go out of production. However, historical trends and existing conditions indicate that the action to expand the UGA boundary is not the cause for the diminishing long term commercial significance for agricultural production from these lands. The land markets have already signaled that farmers will not bid for land for its agricultural productive capacity at prices equal to what buyers for homes and other development uses will pay. Farming much of these land areas is not viable for the long term even though the following actions have been taken: 1) the county's agricultural zoning limits development, 2) land owners can receive greatly reduced property taxes through current use farm and agricultural land designation and 3) technical assistance is offered to farmers through WSU Extension's various United States Department of Agriculture incentive programs.

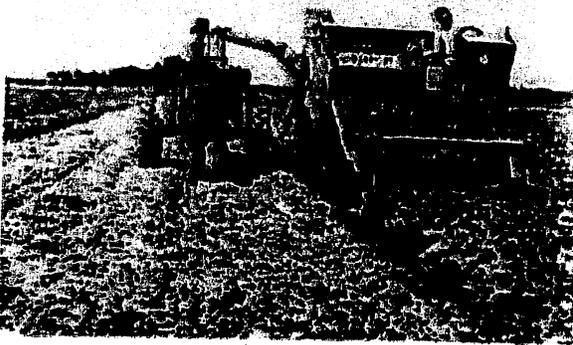
Rapidly escalating land prices in the County have created a major barrier for new farmers to enter this business. Intervention in the land market by actions such as purchase of development rights is the only assured way of holding land for agriculture. However, most often these types of land resource programs also need to be implemented with other farmer support programs to guide the agricultural industry to greater prosperity in a highly urbanizing county. Clark County does not have the full array of agricultural support programs in place.

Competitive economic forces among agricultural producers determine who has the right products at suitable prices to meet customer demand. Consumer demand can alter the dynamics of the market and change the course of an industry. Demand for locally produced food and other agricultural products is probably the most encouraging prospect for Clark County farmers. However, the growth in local demand and the prices consumers are willing to pay is not sufficient to reverse the longstanding trends of declining farm activity or to encourage large numbers of farmers to locate in Clark County.

Introduction

This report addresses the agricultural conditions of Clark County, Washington with consideration of the historical perspective, current conditions and future expected conditions. This report provides the Board of County Commissioners and others with objective data and background information to address the issues of agricultural resource lands designation and protection in the context of approving a preferred alternative for the new Comprehensive Growth Management Plan.

Clark County has a long and rich tradition of agriculture. Farmers and agricultural producers have always been very diverse with regard to what they produce and their size and types of operations. Yet this industry sector continues to evolve and change in response to many influences, and it will undoubtedly continue to do so in the future. Land use planning is one of the major influences over how much and of what type of agriculture remains in Clark County. Yet there are many, many other factors over which the county has little or no influence that direct this industry toward its future.



Two elements of the comprehensive planning

process are considered:

- 1) Agricultural lands within the expansion areas (Alternatives 2 and 3 as of March, 2006 and the Preferred Alternative as of October, 2006).
- 2) Agricultural lands in the more rural areas of the county.

Analysis in this report emphasizes the conditions related to the expansion areas of Alternatives 2 and 3 and the Preferred Alternative. This is a fact-finding report that draws on existing information to the maximum extent possible. One county level data source that is almost universally relied upon for agricultural production data is the U.S. Census of Agriculture (Ag Census). It is certainly not perfect and its validity is often disputed. Nonetheless, it is official government data and it captures some trends since the census is taken every five years. This report also contains reference to other government data sources and special studies that address relevant topics covered in this report. The observations of local persons who are active as farmers/agricultural producers or who work closely with farmers are also referenced and considered (see Appendix E).

Bruce Prenguber of Globalwise Inc. is the principal author of this report. Globalwise is an agricultural economic consulting company based in Vancouver, Washington. Bruce has studied many aspects of local, regional, national and international agriculture over the past 25 years. He has also analyzed lands in the agricultural zone that are within the Urban Growth Areas (UGAs) of Clark County for their significance for long-term commercial agricultural production. Nick Beleiciks has assisted Globalwise with collection of agricultural data to describe agricultural activity and to estimate the economic contributions of agriculture to the overall county economy.

Historical Conditions

An in depth look at Clark County agriculture from the 1900's to the mid-twentieth century is available from a series of documents authored by the Washington State Department of Agriculture and USDA. All references in this report to conditions in Clark County agriculture in 1954 or earlier are from these documents unless otherwise noted.¹

The U.S. Census of Agriculture (Ag Census) is also a primary document used in this report. It is important to remember when reviewing census data in this report that there is no distinction of a "commercial" farm from a "non-commercial" farm: the Ag Census counts a farm if the respondent self reports that they are a farmer, regardless of the amount of acreage so long as the farm income is actually or normally \$1,000 or more per year. It should also be pointed out that some of the newer (and typically smaller scale) types of diversified farms are not in the USDA database to receive the Ag Census, so their responses are often not included.

Historical Description of the Extent and Location of Farms

In the 1950's there were over 200,000 acres in farms. The 1957 report gives a general description of their location:

"Most of the county's 219,000 acres in farms are located on the alluvial plains of the Columbia, Lewis and Washougal Rivers; the Salmon and La Camas Creeks and on the sloping terraces above these streams. Terraces and benchlands where the Columbia and other rivers meandered during early geological times are large in area."²

A description of land and soils also reveals how USDA considered soils, the general location of farm lands and utilization of the land for agriculture.

"The land of Clark County is divided into six broad classes of economic land use. Class I and II lands are of high and better -than-average productivity and support the farms with the highest income. This good farming land, however, is limited in area. It includes the silty loams of the Columbia River bank flood plains surrounding Vancouver Lake and the low terraces along the river north of Vancouver. Small areas are found east of La Center and on the drained lake bed of Fargher Lake northeast of Yacolt. Class III and IV lands are about average in productivity and support farms of fair income when prices are good for farm products. This area covers most of the higher terraces and sloping land five to fifteen miles inland from the Columbia River, including the prairies and bottom lands of the Washougal, La Camas, Salmon Creek, East Fork and Cedar Creek Valleys."³

¹ Clark County Agriculture Washington, Crop and Livestock Reporting Service Bulletin, published in 1957. The documents are at:

http://www.nass.usda.gov/Statistics/by_State/Washington/County_Profiles/clark.asp

² Crop and Livestock Reporting Service Bulletin, "Part III - Physical Description", Clark County Agriculture Washington, 1957 page 16.

³ *Ibid* page 19.

The 1957 report also describes the relative importance of Clark County agriculture in terms of production in the rest of Washington to add perspective for the county's contributions in this earlier time.

"Clark is noted as the leading western Washington orchard growing area and as a county with well-diversified livestock, poultry and field crop type of agriculture. The pattern of farming is greatly influenced by part-time farming and its proximity to the Portland urban area. In production of plums and prunes, Clark County is second in the state and 32nd in the nation. It also has ranked among the first ten counties of the state in production of cherries, pears, dairy products and turkeys according to recent census. Clark was 21st in the state in value of farm products sold during 1954, with total sales of \$8,584,322. Of this sum, \$6,068,113 was received by producers for livestock and livestock products, eighth highest in Washington. Income per farm is slightly below the state average mainly because of numerous, small, part-time farms which outnumber the larger commercial farms. While secondary to manufacturing, agriculture has played an important part in the expanding population and economy of Clark County." ⁴

A 1972 publication by USDA has a more recent descriptive assessment of agriculture in the county. ⁵ Following are direct quotes from that report:

- o "About 42 percent of the county is cleared and in farmland." (Equivalent to about 168,000 acres).
- o "Most of the farmland lies in the central, western and southwestern parts of the county. This area is composed of terraces and terrace plains, about 30 to 800 feet above sea level."
- o "In these areas farming is confined to the larger valleys. Much of the cleared land is in hay and pasture."
- o "Dairying is the most important farm enterprise in the county; it accounts for more than 40 percent of the value of farm products sold. Other important farm products are vegetables, berries and orchard fruits."

The Land Base of All Farms

The U.S. Census of Agriculture was conducted in either five or 10 year intervals between 1900 and 1954. It shows the number of farms in the county grew steadily from 1,873 farms with 192,700 acres in 1900 to 4,934 farms with 204,850 acres in 1945. Note that the census has always counted all entities in the category of "farm" so long as there is at least \$1,000 of sales.

The peak year for acreage in farms was 1950 when the census reported that almost 220,000 acres were in farms. This was 54.1 percent of the county's total land base. A sizeable amount of woodlands were included in the total acreage estimate along with cropland, pasture and grass fields.

⁴ Crop and Livestock Reporting Service Bulletin, "Part I - History of Clark County Agriculture", Clark County Agriculture Washington, 1957, page 1.

⁵ See Soil Survey of Clark County, Washington, by Soil Conservation Service, USDA, November 1972, page 1.

Historical Conditions

In contrast to the 1950's, the 2002 Ag Census reports that Clark County had 1,596 farms with 70,694 acres.

The historical farm statistics show that Clark County has always been dominated by small farms. However, "small keeps getting smaller". In 1954 it was reported that:

"Small farms are characteristic of agriculture in Clark County. Over two thirds of all farms in the county are less than 50 acres in size."

In 2002 the census data shows 80 percent of all farms were less than 50 acres in the county. In 1954 the average size of farms in the county was 51 acres; in 2002 the average size was 44 acres and the median size was 20 acres.

Number of Farms by Income and Acreage

The Census of Agriculture shows a large number of respondents who reported gross sales of less than \$2,500 and the numbers have fluctuated widely between 1987 and 2002 (see Table 1). The 2002 census shows a 78 percent increase in this category from 1997 to 2002.

Net income is one of the best determinants of what constitutes commercial farm businesses versus non-commercial farmers. Gross sales do not provide a clear indication of commercial farm businesses, but higher level of sales does correlate with on-going business intentions. Table 1 shows the number of farms with sales of \$25,000 and over to give an indication of commercial farm trends. Comparison of 1987 to 2002 shows a decrease of 30 farms with sales of \$25,000 or more. However the low point was in 1997 at 151 operations, and the number rose to 170 in 2002.

Table 1 - Number of Farms in Clark County: 1987, 1992, 1997 & 2002

Farms by Sales of Products	1987	1992	1997	2002	Change 1997 to 2002
Less Than \$2,500	716	596	523	931	+78
\$2,500 to \$4,999	242	226	215	203	-6
\$5,000 to \$9,999	196	148	156	157	nil
\$10,000 to \$24,999	114	130	126	136	+6
\$25,000 to \$49,999	40	43	51	41	-20
\$50,000 to \$99,999	36	30	34	35	+6
\$100,000 Plus	125	82	66	94	+42
Grand Total	1,468	1,243	1,178	1,596	+35
Total With Sales Over \$25,000	200	155	151	170	+13

Source: 1987, 1992, 1997 and 2002 U.S. Census of Agriculture for Clark County, Washington by National Agricultural Statistical Service, U.S. Department of Agriculture

The census data also shows the amount of land in "all farms" and this is given in Table 2. There has been major growth in the number of farms in the 1 to 9 acreage class from 1997 when there were 297 farms reported compared to 471 in 2002. There was also an increase in the 10 to 49 acre class in the same five year period.

Table 2 - Farms by Size for All Farms in Clark County, 1987, 1992, 1997 & 2002

Size of Farms (Acres)	1987	1992	1997	2002
* to 9	274	271	297	471
10 to 49	679	610	543	793
50 to 179	367	285	246	264
180 to 499	84	68	70	51
500 to 999	19	15	14	14
1,000 or more	5	8	5	3
Average Farm Size	66	66	62	44

Note: "All farms" are farms reporting sales of \$1,000 or more or farms that normally have sales of \$1,000 or higher.

Source: 1987, 1992, 1997 and 2002 U.S. Census of Agriculture for Clark County, Washington by National Agricultural Statistical Service, U.S. Department of Agriculture.

Table 3 presents a comparison of the type of crops grown on farms in Clark County in 1997 and 2002. The largest single crop category produced in 2002 is nursery, greenhouse and floriculture crops at \$18.7 million. Ranked second by total sales is milk and milk products at \$9.5 million, followed by poultry at \$7.0 million, fruit and berries at \$5.8 million, cattle and calves at \$4.67 million and Christmas trees at \$1.3 million. All other categories had less than \$1.0 million in estimated sales.

Table 3 - Type of Agricultural Products Grown on All Farms in Clark County : 1997 and 2002

Value of Sales by Commodity/Group	1997		2002	
	Farms	\$1,000	Farms	\$1,000
Grains, Dry Beans, Dry Peas	NA	NA	17	\$154
Vegetables, Melons, Potatoes, Sweet Potatoes	NA	NA	45	\$974
Fruits, Tree Nuts & Berries	103	\$4,155	117	\$5,796
Nursery, Greenhouse, Floriculture, & Sod	NA	NA	140	\$16,682
Cut Christmas Trees & Short-Rotation Woody Crops	NA	NA	40	\$1,310

**Table 3 - Type of Agricultural Products Grown on All Farms in Clark County :
1997 and 2002**

Value of Sales by Commodity/Group	1997		2002	
	Farms	\$1,000	Farms	\$1,000
Poultry & Eggs	113	\$5,983	120	\$7,031
Cattle & Calves	836	\$5,472	502	\$4,718
Milk & Other Dairy Products from Cows	32	\$14,231	25	\$9,514
Hogs & Pigs	38	\$91	49	\$71
Sheep, Goats & their Products	NA	NA	105	\$253
Horses, Ponies, Mules, Burros, & Donkeys	NA	NA	142	\$562
Aquaculture	NA	NA	4	D
Value of Ag Products Sold Directly for Human Consumption	347	\$817	290	\$769
Value of Certified Organically Produced Commodities	NA	NA	21	\$25

Notes: NA = Not Available; D = Not Disclosed

Source: Table 2, 2002 U.S. Census of Agriculture for Clark County, Washington by National Agricultural Statistical Service, U.S. Department of Agriculture

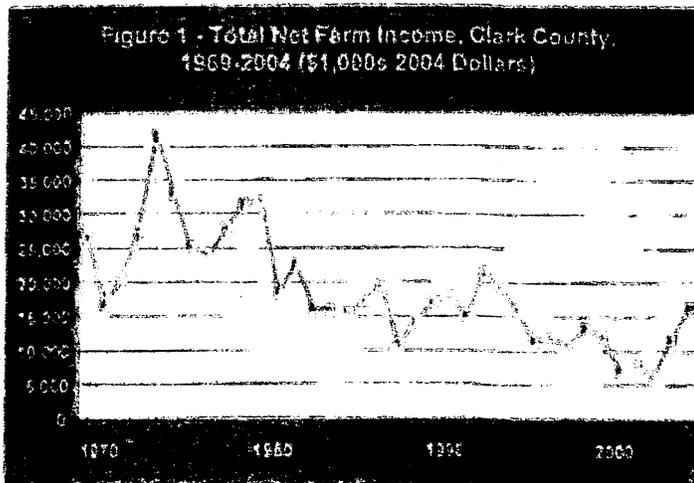
Economic Trends in Clark County Agriculture

The agricultural production sector of Clark County's economy, like the county's economy in general, has undergone many changes in recent years. To understand how Clark County's current agriculture sector compares to the county's historic tradition of agriculture, it is helpful to review the trends of key farm business indicators. Below are historical reviews of farm income and farm employment in Clark County from 1969 to 2004.

Total Net Farm Income

Net farm income is the annual difference between all farm related earnings and all farm related expenses. Farm related earnings include cash receipts from the sale of livestock and crops, government farm payments, home consumption of farm products, and rental income from farm machinery. The cash receipts received by farmers from livestock and crop sales are largely determined by prices set in the world commodity markets. To the extent that farmers "brand" their products or directly market their products to consumers, they may escape some of the world price competition. However, in aggregate, the farm product markets are primarily driven by highly volatile commodity and wholesale pricing. Farm income changes drastically from year to year. Farm related expenses include livestock, feed and seed purchases, chemical products such as fuel and fertilizer, and farm labor expenses. Farm input prices are also largely out of the farmer's control. Fuel prices are determined on the world market and can change significantly during a growing season, affecting net income. Labor costs are less volatile, but farmers face a steady increase in the cost of hiring workers.

Net farm income in Clark County over the past 35 years reflects the fluctuation in farm commodity output and input prices. Figure 1 shows the inflation adjusted total net farm income for all farms in the county, including sole proprietorships, partnerships, and corporations.

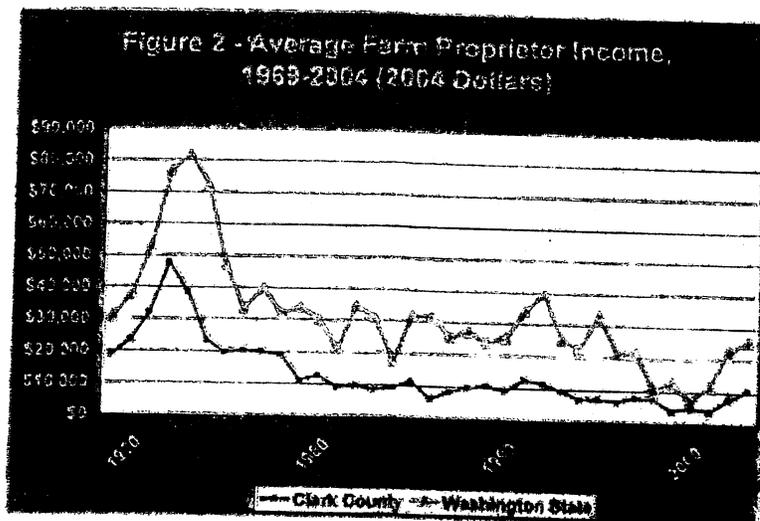


Source: Bureau of Economic Analysis, Regional Economic Information System, Table CA45, and Bureau of Labor Statistics, Inflation Calculator.

The best year for farm income in the county was 1973, when high commodity prices led the county's total net farm income to an adjusted high of \$43.8 million. The lowest level of total net farm income occurred in 2002, when declining agricultural acreage and low commodity prices dropped the county's total to \$6.3 million. Recent rises in commodity prices and the increase of nursery crop production in Clark County have brought total net farm income up to \$16.5 million in 2004, the most current available year of data.

Average Farm Proprietor Income

Average farm proprietor income reveals the general level of profit for non-corporate farms in Clark County. Figure 2 shows the inflation adjusted average farm proprietor income from 1969-2004, and compares the county with Washington State's average farm proprietor income. The trends for average farm proprietor income follow closely the total farm income trends in Figure 1. Income was highest in Clark County in 1973 at \$47,663 when adjusted for inflation, and farm proprietor income reached its lowest point in 2002 at \$3,902. Clark County farm proprietor income has been less than half of Washington State's average in most years. For the most current available year 2004, Clark County's average was \$10,563 and Washington State's average was \$25,584.

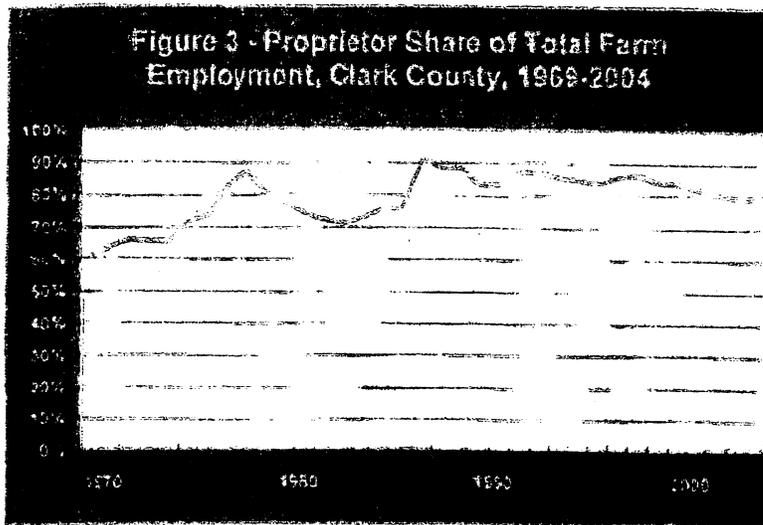


Source: Bureau of Economic Analysis, Regional Economic Information System, Tables CA45 and CA05, and Bureau of Labor Statistics, Inflation Calculator.

Proprietor Employment as Share of Farm Employment

On the county's small farms, the main source of labor is most likely the owner operator and family members. Since farm labor expenses are significantly reduced on these types of farms, or they have another off-farm job to rely upon for the majority of the family income, some producers may be able to continue farming when commercial agriculture is otherwise no longer viable. The percentage of proprietor farm employment suggests what proportion of farms in

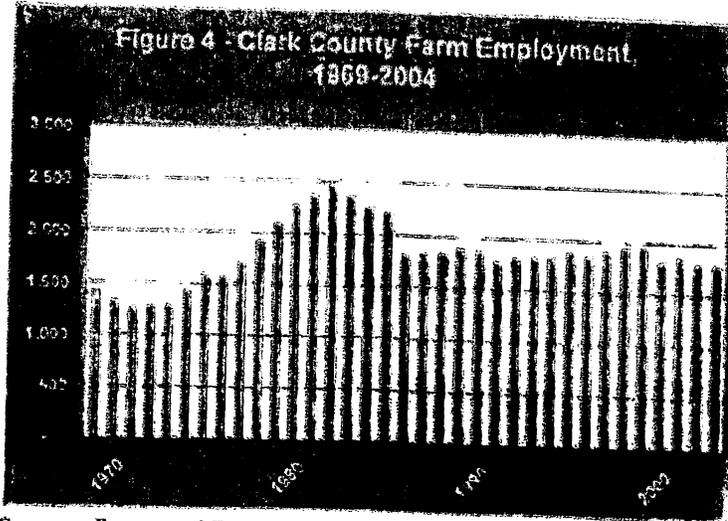
the county are these types of small farms. A low percentage indicates most farm work is performed by hired workers, which is more characteristic of large or commercial farms. Figure 3 shows partner and sole proprietor farm employment as a percentage of total farm employment in Clark County over the last 35 years. In 1969, these owner operators made up 60 percent of farm employment in the county. Farm proprietor's share of employment increased until 1978 when it reached 87 percent. It dipped through the next decade, but proprietor share of farm employment then reached its all time high of 91 percent in 1987. Proprietor share of farm employment has generally shrunk since then, and was 79 percent during the most current available year of 2004.



Source: Bureau of Economic Analysis, Regional Economic Information System, Table CA25.

Total Farm Employment

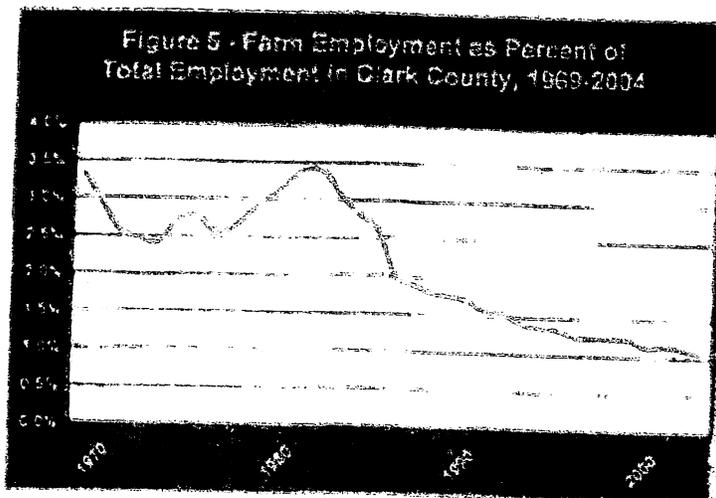
Total farm employment is the number of people who work in the direct production of crops or livestock. Unlike farm income, total farm employment in Clark County does not vary drastically from year to year. Figure 4 shows the total farm employment for all farms in the county, which includes sole proprietors and partners working on their own farms, the workers they hire, and hired laborers working on corporate farms. Farm employment in the county reached its peak in 1983 when there were 2,457 agricultural workers. The lowest level of total net farm income occurred in 1972, when there were 1,255 agricultural employees in the county. Total employment stabilized in 1987 and has since remained near the most current available figure of 1,778 workers in 2004.



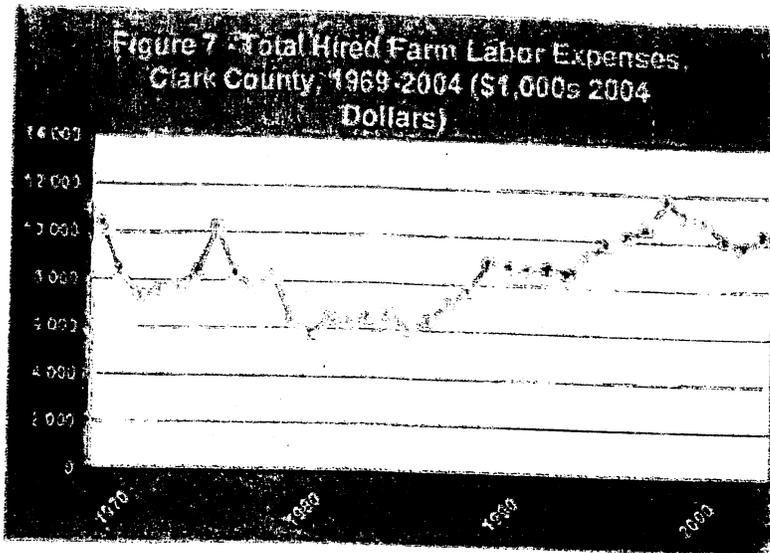
Source: Bureau of Economic Analysis, Regional Economic Information System, Table CA25.

Farm Employment as Percent of Total Employment

Total farm employment numbers show how many people are directly involved in agriculture. To understand how significant agriculture employment is relative to the size of Clark County's total workforce, farm employment needs to be compared to non-farm employment. Figure 5 shows the percentage of farm employment to total employment in the county over the last 35 years. Farm employment's share of total employment was highest in Clark County at 3.5 percent in 1969 and again in 1982-1983. Agriculture's share of total employment has declined steadily since then, and was 1.0 percent of total employment in 2004, the most current available year. Total employment in Clark County has risen every year since 1983. The steady rise of non-farm employment in comparison to the relatively flat number for farm employment accounts for the declining share of agricultural employment as a share of total county employment.



Source: Bureau of Economic Analysis, Regional Economic Information System, Table CA25.



Source: Bureau of Economic Analysis, Regional Economic Information System, Table CA45, and Bureau of Labor Statistics, Inflation Calculator.

Current Conditions in Agriculture

Based on conversations with farmers in the county, it is clear that for many years there has been a loss of the larger traditional commercial farms including dairies, berry farmers, fruit producers, and others. Commercial broiler chicken production has remained fairly constant in terms of total production, but the number of growers has declined as the most successful or well capitalized farmers have expanded production. One bright spot in Clark County agriculture is the ornamental nursery sector which has experienced growth in recent years. Otherwise "new" agricultural production has primarily occurred among smaller scale farmers who tend to sell directly to consumers through farm stores, farmers markets, to subscription buyers or over the Internet. New small scale agriculture has not made up for the loss of traditional farmers and the total amount of land devoted to commercial agriculture continues to decrease.

Location and Types of Farms

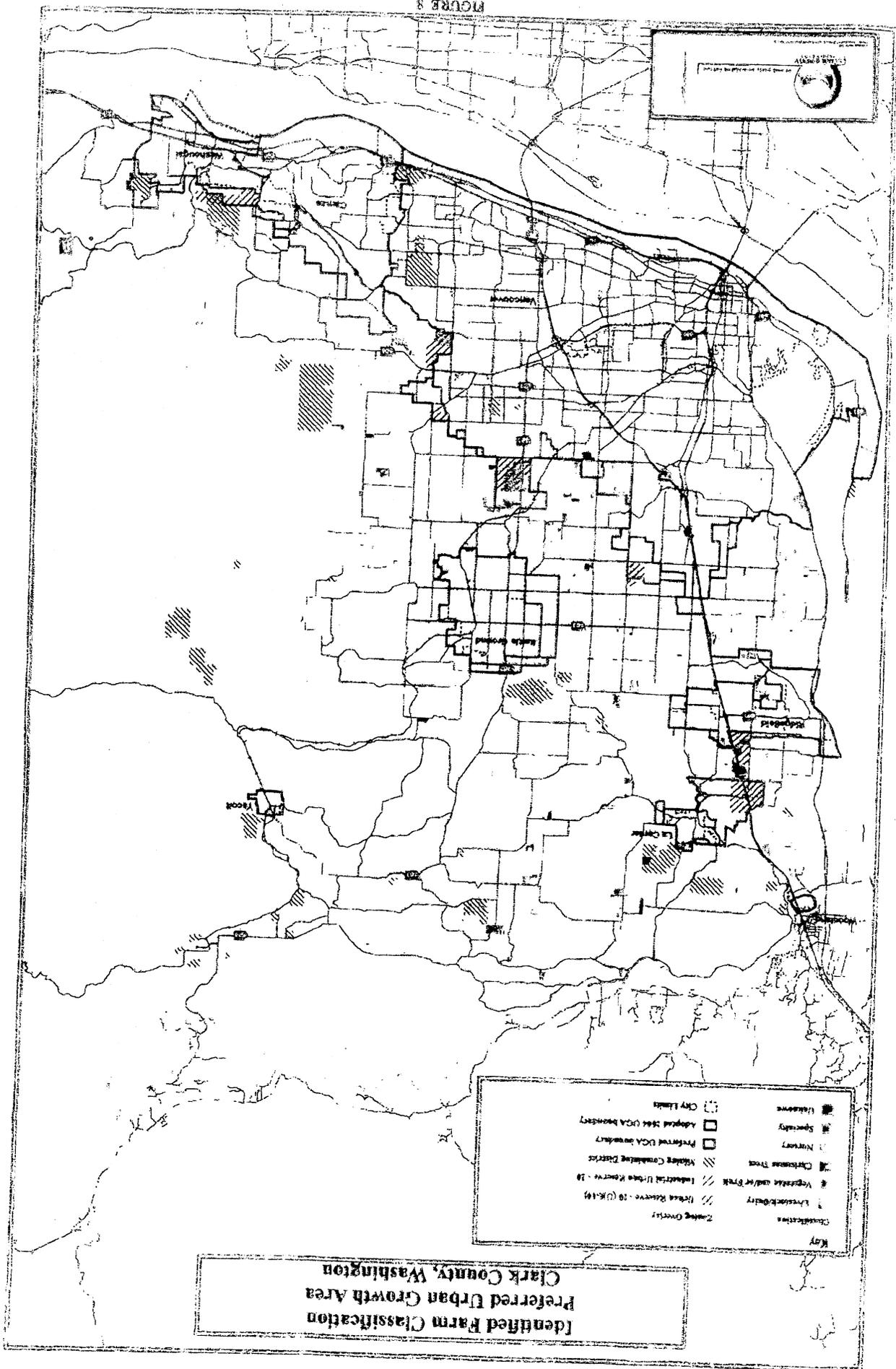
The best way to analyze current conditions is to address farming at the individual farm level. In this analysis, 145 farms (including nurseries and Christmas tree growers) have been identified. As some data sources are at least one year old, some of these operations may be out of business. A number of different sources have been used to identify and locate Clark County farms. The information sources include Clark County Extension, published farms in local newspapers, industry directories, telephone directories and discussions with farmers. The types of farms are classified as livestock/dairy, vegetable and/or fruit, nurseries, Christmas trees, or specialty crops. There are 3,115 acres identified with the above farms.

The land area associated with the farms has been tracked in the county GIS program. There are two data limitations to recognize. First, it is not possible to locate every commercial agricultural producer. Second, there are many farmers who operate a part of their operation on leased land, and there is no information to link the farm ownership data with leased or rented lands, using GIS.

Figure 8 is a map showing the location of the identified farms. The farms are well dispersed throughout the lower elevation areas of the county. The fruit and vegetable farms are generally located in the central part of the county, north of Vancouver and to the northwest in the vicinity of Ridgefield. Christmas tree farms are well dispersed with some larger farmers east of La Center. Livestock operations are also well dispersed.

Figure 9 shows the general location of the identified farms with prime soils. The prime soils outside of the city boundaries are quite broadly located across the lower elevations in Clark County. Farms are quite evenly located around areas with either the prime/class I or II soils or the prime Class III soils. Discussions with farmers, however, reveal that many of the newer farms have located based on many criteria with soils only being one factor of consideration.

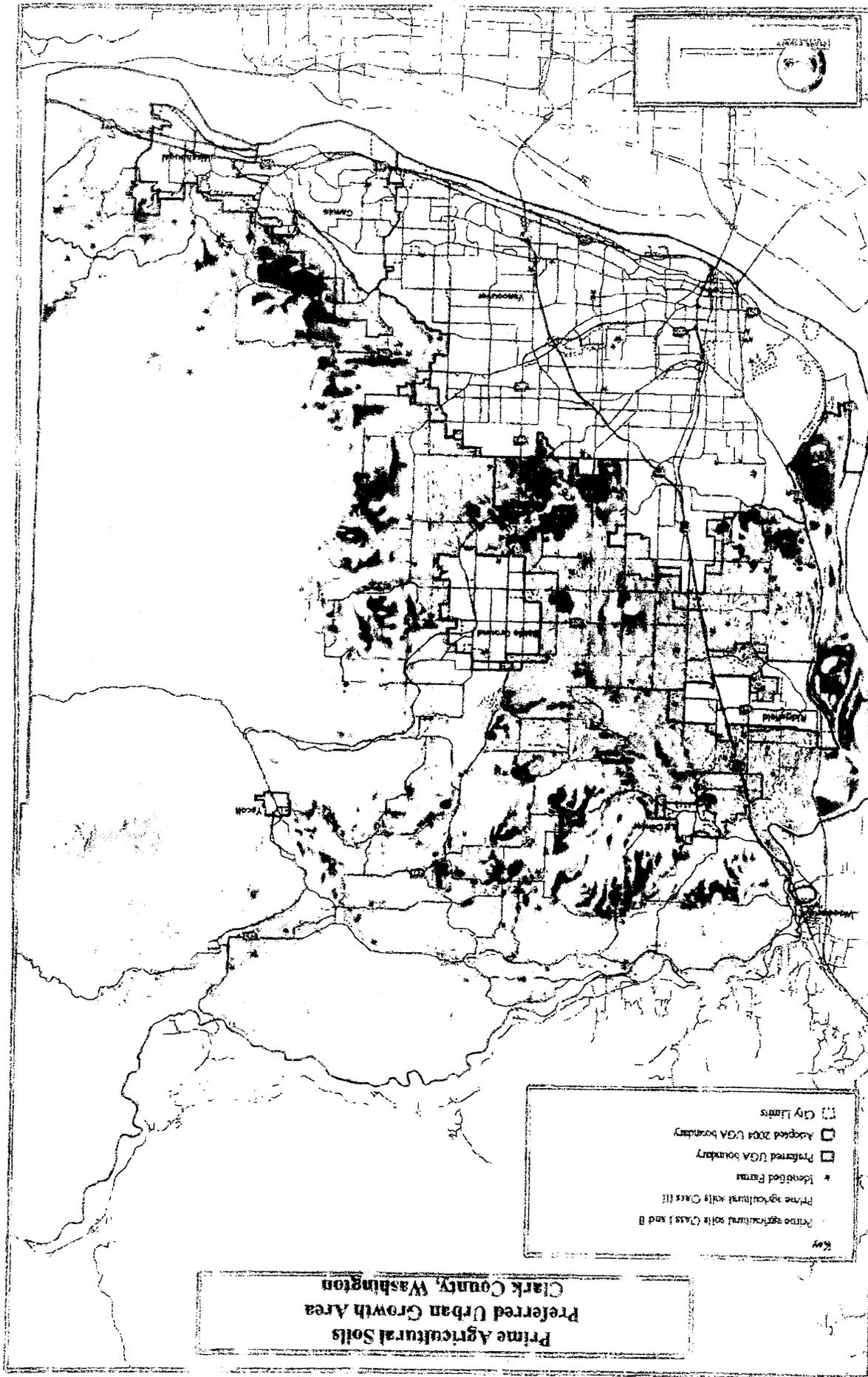
Agriculture in Clark County is diverse and conditions vary among the various sectors. The following is a summary of agricultural conditions based mainly on discussions with local farmers and Extension personnel.



Identified Farm Classification
Preferred Urban Growth Area
Clark County, Washington

Key

■	Residential	□	City Limits
▨	Specialty	□	Adopted 1988 UGA boundary
▩	Industry	□	Preferred UGA boundary
▧	Christmas Trees	▨	Neighboring Counties
▦	Vegetable and/or Fruit	▧	Industrial Urban Reserve - 10
▥	Preservation	▦	Urban Reserve - 10 (U.R.10)
▤	Commercial	▥	County Overlay



Berries

For many years red raspberries, strawberries, and blueberries have been key crops produced in Clark County. One bellwether crop, raspberries, is in decline. The Washington Red Raspberry Commission collects mandatory grower assessments which offer a picture of the trend in production of processed raspberries but does not cover the smallest producers of fresh raspberries.⁶ Processed raspberries are marketed mainly in frozen whole form or converted to juice and juice concentrate. Their data shows steady attrition in the number of producers over the last five years. In 2000 there were 17 producers with 3.13 million pounds of production. The number of producers has steadily declined to 10 producers in 2005 with 2.5 million pounds of production. Washington agricultural statistics for 2004 show that Clark County is a distant third in raspberry production, after Whatcom and Skagit counties.

Consumer demand of blueberries is very strong and production in Clark County, as elsewhere in the Pacific Northwest, has responded. The state agricultural statistics estimate that in 2004 Clark County harvested 1.5 million pounds on 300 acres. New plantings are in the ground but there are no statistics to estimate the acreage.

Tree Fruits

Clark County was once a leading Italian prune producing county. That ended many years ago. Today tree fruit production is confined to a few farms, most of which do direct marketing. Peaches and apples are probably the main fruit trees left in production. Pear trees have historically been significant with Bartlett pear production for canning. However Clark County's Bartlett trees are nearly all gone as other fruit production areas in the region introduced newer, more popular fresh market varieties. No county level production statistics on tree fruits are available.

Vegetables

There are no statistics or reliable way to estimate the acreage or number of farms that produce vegetables in the county. Most farms that raise vegetables are diversified in the number of crops produced and they vary the mix of crops year-to-year depending on perceived consumer demand. About 10 years ago there were larger farms with several hundred acres devoted to selected vegetable crops. Virtually all of those farms have ceased production. The 2002 Ag Census shows 46 farms with 622 acres producing vegetables. Only about one third of the acreage was indicated as irrigated.

⁶ Growers who produce less than 6,000 pounds of raspberries are exempt from paying assessments and reporting to the Washington Red Raspberry Commission.

Presently there are a few farms that have perhaps in the range of 10 to 75 acres in vegetable



crops. Most or all are selling fresh vegetables by direct market means or selling to other direct marketing retail outlets or farmers markets. Clark County farmers tend to grow the high gross revenue vegetable crops including pumpkins, squash, sweet corn, cucumbers, and tomatoes. Crops such as lettuce, cabbage, carrots and potatoes are grown in very small quantities by the remaining local vegetable farmers. It should be noted that a small number of farmers who sell vegetables are also

Pumpkins are a favorite of local consumers.

diversified and many grow ten or more crops.

Some have found success by directly selling their own and other farmer's crops through their own farm stores, at local farmer markets or to consumers who subscribe to purchase the crops. Farmers who run their own direct retail stores have also branched out to sell value added products such as apple cider, jams, and other foods or ornamental plants. A further source of revenues for some retail farm markets include such agri-tourism attractions as corn mazes, petting zoos, pumpkin launches and hay rides.

Christmas Tree Farms

Christmas trees are grown in many locations and on a variety of different sized parcels in the county. Christmas tree production has been one of the larger segments of agricultural land use in the county in recent years and a number of Clark County growers have been interviewed for this analysis.

Many rural landowners investigate growing Christmas trees but the number of growers that have entered this business in recent years is probably in the range of 20 to 30. There is an increasing number of "choose and cut" growers who sell trees at their farm. Most of these growers are in the smaller size grower group (under 20 acres) and they can be identified by the listings in the local newspapers. The 2006 newspaper listings of growers suggest that Clark County has in the range of 25 to 35 farms that are directly selling their trees. There are undoubtedly more small growers that are hard to document because they operate more informal small businesses that sell small quantities of trees to other growers or wholesalers.

Most of the growers who were contacted believe that there are some new growers entering this business. However finding quality land for new operations is a challenge. One very knowledgeable and well-established grower said they carefully and comprehensively surveyed the entire county two years ago for new land to plant a commercial stand of Christmas trees (particularly Noble Firs). They did not find any high quality sites, which would include parcels of 20-30 acres in size, have adequate soils for good water drainage, have the proper wind conditions and related micro climatic factors for ideal tree production. Good drainage is particularly important for Noble Firs, which is the species in greatest demand, but other tree species also benefit from proper soil drainage. It is likely that most of the new future plantings

will come on the small acreages adjoining the owner's residence or perhaps on leased land or land on which other land use is anticipated in 10 plus years in the future. These considerations are not related to the primary characteristics for the land for tree production and compound the difficulty for the county to foresee where new Christmas tree production may locate.

At the present time most observers think the Christmas tree industry in the Northwest is in a down cycle. Growers report that wholesale and retail Christmas prices were "soft or flat" in 2006 and the outlook is the same in 2007. One large grower has already contracted for 2007 sales of Noble Firs with some long standing customers at prices three to four percent lower than they received in 2006.

The plantings data for Oregon is the only published data to assess the near term economic conditions. There is no comparable plantings data for Washington, and Oregon is by far a much larger production area than Washington. During the period 1999-2006, Oregon had annual plantings of 8.0 million or more trees. The peak planting year was 2001, at 10.4 million trees. In 2005 Oregon's total tree sales were 6.9 million. The plantings in 1999 are now reaching harvest age. While there has been growth in sales in 2005 over reported levels in 2001 and 2003, the data suggests that the larger and firmly established commercial wholesale growers will likely be very competitive in the markets as increased supplies reach harvest age. The most vulnerable growers will be first time sellers who must break in as unknown suppliers. New sellers, especially in wholesale markets, must usually offer lower prices to establish themselves, particularly in down market cycles. Retail "choose and cut" growers will also see more downward price pressure.

The technical knowledge needed to manage an efficient and profitable Christmas tree farm is significant and this affects the ability of new growers to successfully enter the business. While WSU Extension is working closely with growers and offering short courses and management advice, new growers commonly underestimate the importance of selecting the proper sites and applying needed cultural practices to assure a crop of high quality, disease-free trees. The need for close field monitoring and applications of herbicides, fungicides, insecticides and fertilizer also complicate the management of tree farms when they are located near residential properties, other built environments and waterways.

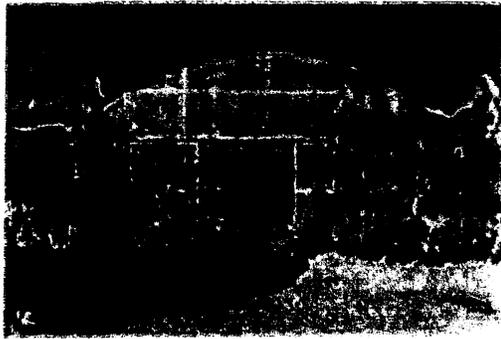
Marketing and farm location are crucial for smaller farms that want to sell by the "choose and cut" direct sale retail method. Small acreage growers rarely find it cost effective to invest in the commercial tree baling and loading facilities needed to fill semi-trucks destined for wholesale markets. As Clark County growers have expanded their wholesale and retail channels, new small growers must find their niche in this business in order to thrive. Choose and cut sales may seem the easiest and more profitable marketing approach, but success is often highly dependent on farm locations that are easy to find and the growers must offer the buying experience and suitable quality that customers are seeking.

Clark County is not among western Washington's top five largest counties for Christmas tree production. It is most likely that total production will plateau and then decline in the years ahead. There are several reasons for this. Development patterns in the county have already limited the availability of land parcels of 20 acres or more that are well suited for Christmas

trees. Second, high current land prices preclude growers from establishing new long-term operations as sites for Christmas tree production. Planting Christmas trees on open land can be a means for saving property taxes as land owners await further land development. Finally, most Clark County growers are generally in the age range of 50 years and older. There are few next generation land buyers who can follow by managing commercial size properties and covering the many years of negative cash flow.

Given all of the factors discussed above, it may likely be difficult for the county land use planners to predict where new Christmas tree farms may locate. There will undoubtedly be some growers who will overcome the production and marketing barriers to establish themselves in Clark County. However, few are likely to locate on parcels over 20 acres and they will not fully replace the expected loss of existing Christmas tree farms which go out as new development extends from urban areas to non-urban areas.

Ornamental Plant Nurseries



Local retail sales are the main market outlet for Clark County plant growers.

Ornamental plant nurseries cover many types of growing operations, from greenhouses to container nurseries to retail garden centers. This has been the more growth-oriented side of agriculture in Clark County and it has been propelled in large part by the growth in new housing and the general trend toward home and commercial site beautification. A good resource for showing the diversity and extent of nurseries in the county is found in a publication prepared annually for the membership of the Specialty Nursery Association of Clark County (SNACC).⁷ The SNACC membership includes nurseries that sell annual and perennial plants, shade

trees, fruit trees, other trees, shrubs, herbs, produce (food plant starts), berry plants, ground covers and more. There are both wholesale and retail nurseries listed. A total of about 20 nurseries in Clark County are listed in their latest guide, and some of the major nurseries in the county are not members of SNACC.

The 2002 Ag Census shows 140 farms within the category of nursery, greenhouse, floriculture, mushrooms, sod, and vegetable seeds in the county. The census data also shows 1.528 million square feet under glass or other protection and 642 acres in open field production.

To remain in business the independent garden centers and the smaller nurseries that supply the independent garden centers must effectively compete against the "big box" chain stores like Wal-Mart, Lowes and Home Depot. In Clark County, the big box chains have an increasing presence and are supplying a large share of the total market. Meanwhile there are independent retail garden centers that are succeeding and some are expanding. Charles Brun, Clark County Extension horticultural specialist, has identified the key strategy for the nurseries and

⁷ See 2006 Specialty Nursery Guide, by the Specialty Nursery Association of Clark County.

independent garden centers: grow specialty plant materials outside of the mainstream plant groups which the large retailers feature. Some growers and retailers are building profitable riches. [See <http://gardencenternursery.wsu.edu/marketing/IndependentsCompete.htm>.] The independent nurseries need strong business skills to complement production know-how.

The Willamette Valley of Oregon is a very large nursery production area and Clark County retail garden centers generally look there first for sourcing most plants. Many independents are members of the Northwest Nursery Buyers Association and the NNBA reports that Clark County has no wholesale growers who are on the association's approved vendor list.

Because of the future growth in Clark County, there will be opportunities for expansion by local nurseries. From a land use perspective, it is important to remember that plant nurseries are land intensive. In other words, 500 to 1,000 acres of open field and greenhouse production for the entire county is a very significant amount of land for these businesses to produce plant materials. Based on discussions with nursery growers, wholesale nursery businesses are often in the five to 20 acre size range and some are much smaller than five acres. Retail nurseries that "grow out" some plant materials are usually on three to five acres. A wholesale growing nursery with 15 to 20 acres is considered a large operation in Clark County.

The location of a grower's nursery that relies on at least some retail sales generally needs easy customer access. It is less difficult for nurseries to operate near a residential population than almost any other type of agricultural enterprise. The soils of nurseries are often highly amended, unless the operation has extensive in-ground tree production. Often shrub and small stock plant production is in containers and the native soils are not used. For these reasons, it is very hard to pre-determine where new nurseries may locate.

Other Specialty Crops

Crops such as ginseng, golden seal and chestnuts are specialty crops produced on relatively few, small-acreage farms in Clark County. However, the successful specialized producers have refined their production techniques and found market outlets that bring them sizeable gross and net income. Strong management skill and production know-how are crucial to their success. Markets for these crops are finite and it is hard to predict the land characteristics and location where future specialty farm operations like these may be established.

Wineries and Wine Grapes

Clark County is home to three wineries that produce wine from grapes grown here. Pinot noir is the main wine grape varietal grown in the county. In addition to the three wineries, which all produce grapes, Clark County has three other wine grape growers who sell their grapes to wineries. According to one winery owner, about 75 acres in Clark County are devoted to wine grape production. Expansion is proceeding slowly with perhaps three to 10 acres being added annually in recent years.

Beef Cattle

The latest Ag Census reports that Clark County had 4,543 beef cattle and calves in 2002. Discussions with some of the livestock operators suggest that there are about four to five larger

operations that together account for several thousand head. The one large commercial cattle feeding operation known to exist uses very low cost food waste from a local snack food manufacturer. A few herds of 50 to 100 head are also reported. The cattle sector is very restricted within Clark County because there is no low cost public land for grazing and there are no USDA inspected slaughter facilities.⁴ Many of the beef cattle in the county are grown non-commercially for personal beef consumption on the small rural properties. Additionally some beef cattle are sold to third parties who then have the animals slaughtered by mobile meat processors. This is a very small scale enterprise because re-sale of the meat is not allowed by law since the processing is not done in a USDA inspected packing plant.

Cow and Goat Dairies

Historically cow dairies were a major part of Clark County agriculture. The county's dairy industry has steadily declined. Dairy farmers in the county indicate that there are seven remaining cow dairies. It is reported by the WSU dairy specialist that in 1984, there were 84 dairies in the county.⁵ Dairy operators and former dairy operators state that many reasons exist for the decline. First, the clear trend is for fewer and larger dairies, which have achieved economies of scale. The move to larger dairies also is part of the reason milk prices are low, which pressures the smaller dairies and leads them to expand or leave the industry.



The favored areas for dairy production in the Pacific Northwest are east of the Cascades in eastern Washington, eastern Oregon and in Idaho. Among the reasons the industry has been re-locating to these areas relative to western Washington are: less costly feed (principally alfalfa hay), lower cost land which allows the dairy operators to expand their land base and herd size, better access to labor and workers who are experienced with livestock care and management, and less effort/lower cost to meet manure management standards.

Clark County has at least two Grade A goat dairies, and perhaps more which may or may

not be licensed. Goat dairies are more specialized operations than cow dairies and can operate on a much smaller land base.

Horses

Clark County has a large number of residents that own horses. Feeding, boarding and other aspects of horse ownership contribute to agriculture. A 2004 survey of horse owners was conducted by the Clark County Executive Horse Council (CCEHC). This analysis relied on

⁴ The closest USDA inspected meat packing plant is in Cowlitz County.

⁵ Personal communication with Gary Fredericks, WSU Clark County dairy specialist.

survey sampling which was used to project the number of horses in the county. The resulting survey estimate was 35,000 horses in the county with an average of 3.9 horses per horse-owning household. The analysis states that the average number of horses per household has increased slightly from 2000 to 2004, but that the number of horses per household declined significantly in the county from 1983 to 2004. The study points to long term population growth (and growth in households) as the reason that horse numbers are growing despite the lower average of horses per household from 1983 to 2004.

The accuracy of the estimation of 35,000 horses is not known, although an estimate of the statistical accuracy is stated in the CCEHC report. The 2002 Census of Agriculture estimates that there were 3,433 horses and ponies on 540 farms in the county. This wide difference is partly due to the fact that the Ag Census is sent to persons who are identified as "agricultural producers", and it is not sent to every horse owner. However, the relevant question is not the total number of horses in the county but how many properties with horses can be considered part of commercial agriculture?

Identifying and describing "commercial horse farms" is problematic. Landowners with small acreage and a few horses for personal enjoyment do not constitute an agricultural enterprise. Horse breeding farms with barns, pens and pasture for 10 or more brood mares and one or more standing stallions are rare in Clark County. It is more common to find horse breeding operations with four to eight mares. In most cases, this is a supplemental source of income or an avocation. Few people make their sole or primary income from breeding, raising or buying and selling horses. Some trainers have significant business and often combine training with operating boarding stables or other equine related pursuits such as judging at equestrian shows.

Long-time horse industry observers say that the larger breeding farms have declined in Clark County because climate, land prices, feed costs, clustering of equine services and other factors favor their location in other more rural areas. In addition, the loss of tax-advantaged treatment for horse breeding farms under federal legislation has reduced the popularity of establishing such operations.

There are many types of horse boarding facilities throughout the county to serve the many horse owners here. Stables may function only to house horses or they may be also feature added equestrian services such as horse training, riding instruction, and horse breeding. Some horse boarding facilities have adjoining land where horses are turned out to graze or where nearby riding trails are available. Other stables have very little open land since horses are primarily housed and fed in stalls with periodic exercise in arenas. Many of the county's horse facilities were built in the 1970's and 1980's. In older facilities there are greater maintenance costs as the buildings age. Stables are generally not considered financially strong businesses so facility upgrade and renovation is an economic issue for some operators. As residential development expands, some facilities are now close to urban development and are receiving odor or insect complaints from neighbors. In addition, the rising land values give stable owners an incentive to close and look for less dense residential areas if they wish to remain in this business. Horse enthusiasts are concerned that the loss of open space and the business pressures on stables are negatively impacting the sustainability of this sector in Clark County.

The horse sector is a source of demand for agricultural crops such as hay or grain. In this regard, the horse sector contributes to agriculture and rural agricultural land use. This also adds a requirement for pasture land for commercial horse operations such as commercial horse breeding operations and for grass hay production.

Poultry and Eggs

Clark County is a significant producer of fryer chickens. The Washington Fryer Commission reports that Clark County produces 11.45 percent of the state's fryer chickens.¹⁰ This represents an estimated production of 5.2 million birds (the 2002 Ag Census reported 4.37 million chickens). The vast majority of production is accounted for by a few large contract growers. Lewis County dominates state production but Clark and Thurston counties are tied for the second. Fryers are produced in "fryer barns" that take up little land area. Nearly all Washington fryer production is on the west side of the state, near the two major poultry processors.

There are no known major egg producers in Clark County. Some of the small scale diversified farms have laying chickens and sell eggs.

Other Livestock

Commercial production of hogs, sheep, lambs, and alpacas complete the assessment for the main types of livestock produced in Clark County. Most observers believe that these species are either in stable production or decline in Clark County. Sheep, lambs and alpacas can be used for fiber production. It is hard to predict that there is any discernible growth in textile use of fibers in the county. There is no tracking of goat production for meat, but there is a sizeable goat population (perhaps over 1,000 head) and it is mainly due to the popularity for goat meat with some ethnic groups. Meat production from hogs and sheep is minor and expansion is limited because Clark County has no USDA approved slaughter facilities.

¹⁰ See www.cluckcluck.org.

What is Commercial Agriculture?

There are wide ranging views about what defines a commercial farmer or agricultural operator. Many of the long time growers in Clark County point to the largest among them that are left in business as "the farmers". Many of the long time farmers also have the view that agriculture is gone or is just about finished here. At the other end of the spectrum, some residents and small farm advocates claim that anyone that produces plants or livestock for sale, regardless of the amount of sales, are farmers.

A more precise concept of who make up the commercial farming industry is important to address for both the long-term land use planning framework of the county and compliance with the GMA. This is also at the crux of the discussion over how to best conserve land for agricultural production. For example if the emphasis is on larger commercial farmers, then larger parcel sizes are generally more important than if the focus is on "all growers". Also ground water availability is a different issue for larger farms than for smaller scale farming.

Defining commercial agricultural operations is also complicated because there are many different types of agricultural operations in the county. One way to establish a definition is to view farmers as those who are able to derive a living from their agricultural business. In this case, farming provides a significant source of income although not necessarily the only source of income.

Using the dictionary meaning of commercial agriculture, the concept is clearly rooted in salability, profit and success of farms. This requires more than mere physical production. There is stability and on-going enterprise. These concepts have to do with the ability to produce, sell and earn a financial return that compensates the business owner for the expense and risk of their business. While some do not want to see farming reduced to financial terms, it appears to be the principal way to narrow the scope of commercial agriculture to a concept that allows the county to best identify and plan for land resource protection that will support successful agricultural enterprises in the future.

The concept of a living wage is one measure of the minimum income necessary to support a family and cover its necessary household expenses. These expenses include food, child care, medical, housing, transportation, and other items. The amount of household expenses required varies according to regional cost differences, such as housing costs, and the size of the family. Data for 2004 estimates that the living wage for one adult in Clark County is \$16,079 and increases to \$42,732 for a family of two adults and two children.¹¹

If farmers earned a living wage this would more likely assure Clark County of having a sustained agriculture industry with more full time producers. Lower income levels are sufficient to keep some farmers in business, particularly very small scale part-time farmers. Regardless of what income threshold is chosen, a positive net income that is increasing over time is necessary in order to cover the costs and risks inherent in production agriculture. The absence of growth in net income has led to the long, downward slide in this industry in Clark County.

¹¹ The living wage estimates are from the Poverty in America website at www.povertyinamerica.net/

Changing Conditions for Agricultural Production

One fundamental issue from the land use perspective of Clark County agriculture is how changing conditions have impacted the land required by the county's agricultural producers. Some observations are warranted.

1. Singular consideration of physical condition, particularly soil, does not indicate the "best" farmland. There is an important interaction between physical and economic factors. For example, the peat soils in Clark County have traditionally been considered as some of the most productive soils. These soils produce excellent quality and yields of cole crops such as cabbage, broccoli and cauliflower. However, the farm gate and retail prices for these vegetable crops are very low and these crops are no longer economically viable to produce in the county. In this case, farmers are not looking to operate land that in a purely physical sense is the most productive.
2. Air drainage and heat units are usually very important factors for determining where the best agricultural lands are located. The highest yields are found on land that receives the most exposure to sunlight and where air moves freely, preventing pockets of colder air from being trapped close to the ground. However, cooler locations are sometimes desirable for crops. Some tree species for Christmas tree production for example, do better on somewhat higher elevations in cooler climatic conditions.
3. The level of soil wetness on some former agricultural lands and the location of wet soils are likely to have changed over time due from the change in drainage caused by built-up land areas. This may have contributed to important changed conditions for agricultural land use when comparing 1950 conditions to present. This also may render some of the soil survey analyses as inaccurate under present conditions.
4. Soil amendment such as adding organic matter to reduce the clay layer of heavy soil is not practical when large acreages are farmed. However, on small scale farm operations, this is more feasible. As Clark County transitions to smaller farm acreages, this also reduces the singular importance of soils to the decision over where to locate a farm operation.
5. Because land has become so expensive, agricultural producers often rent or lease land, including land adjoining land to their base operations. Beginning farmers have also traditionally rented land to get into business with less capital outlay. However in the current land market finding land to rent or lease is more difficult and this is not satisfactory for establishing long term commercially stable agricultural production.

Financing Farms

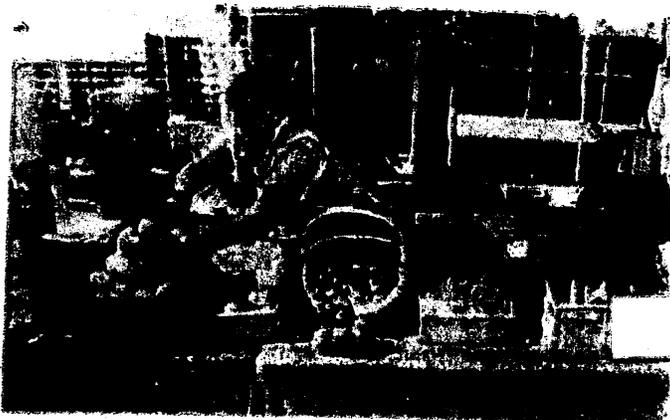
One of the notable findings of this analysis is that there are very few agricultural operations financed by commercial or government lenders. Information provided by the Farm Service Agency (FSA) of the U.S. Department of Agriculture shows that they have had no new borrowers in Clark County in the last 10 years that have purchased 10 or more acres under the

agency's farm loan programs.¹⁵ This is significant because the FSA is the government lender to farm borrowers who do not qualify for standard commercial loans. If FSA is not making these loans, it is also very doubtful that commercial lenders have borrowers who have purchased land and other capital assets. In fact, contacts with several commercial banks identified only one bank which said they had made loans to a few nurseries in recent years.

Discussions with farmers and other agricultural operators in the county reveal that many newer operators have used their own capital to buy land or they have combined a small-scale farm enterprise with the purchase of their rural residence. Others have enlarged their agricultural enterprise with leased land. This situation has led to a low base level of new agricultural enterprise development which cannot fully replace the larger, agricultural operations such as dairies and berry farms, which are going out of business.

Local Marketing

One of the WAC criteria to assess the long term commercial significance of agriculture is the criteria of "proximity to markets". Often this is assumed to mean proximity to population centers. For newer farmers in Clark County, reaching local markets is at least one main factor in



their marketing program. They may sell at farmers markets in the area, set up roadside stands, operate a CSA (Community Supported Agriculture) farm with subscribers who pay for a share of the production, or offer other forms of direct marketing channels.

However the local sales approach is not uniformly adopted by Clark County farmers. Local markets have not generated sufficient revenues to attract

very many new farms to the county.

The case of dairies illustrates the dichotomy of how and where farm products are sold. Some of the few remaining dairies do sell locally to the one milk bottler in the county. On the other hand, one of the largest dairies in the county is shipping their milk out of the county (and out of the Portland metropolitan area) because they realize a significant price premium. In this case the higher price received justifies the added transportation cost.

There are also examples of local nurseries that sell most of their specialty trees over the Internet, and they ship by express delivery. Their markets are often widely dispersed geographically.

Fresh fruit and vegetable producers, and Christmas tree growers are the best examples of agricultural crops that do rely primarily on local markets. However the larger of the Christmas tree growers are wholesalers and their main markets are out-of-state, principally California.

¹⁵ Based on letter with attachments dated February 14, 2007 from Jeffrey Peterson, Farm Loan Officer, Farm Services Agency, USDA, Chehalis, Washington office.

Review of the Recent Supreme Court Ruling

The Washington Supreme Court recently ruled on Lewis County's procedures to designate agricultural lands for conservation under the GMA.¹³ The Court has clearly stated that counties have discretion to designate lands as agricultural land if they follow the requirements of GMA. The court also stated that the designation of agricultural land need not be solely based on the physical character of the land. The Supreme Court has further ruled that agricultural lands are those lands that: 1) are devoted to agriculture, 2) have the capability for production and 3) have long-term commercial significance for agricultural production.

Of these three requirements, long-term commercial significance for agricultural production is the most difficult criteria to evaluate because this is forward looking and lands that otherwise are agricultural can still be de-designated if they are subject to development pressure or they have some change in growing capacity or productivity that affects their ability to contribute significantly to agricultural output.

The Supreme Court acknowledges that counties can also use criteria to designate agricultural lands of long-term commercial significance that are based on regulations promulgated by the Washington Department of Community, Trade, and Economic Development. There are 10 factors CTED has delineated as guidelines for determining the intensity of development pressure on agricultural lands.¹⁴

The Supreme Court also ruled that counties can use additional criteria beyond any that are specified in the GMA or CTED regulations for designation of agricultural lands as long they are consistent with the intent and requirements of GMA.

In Lewis County's case, they advanced the argument that they were establishing the total acreage of agricultural land for designation based on an "agricultural industry needs assessment". Preparing proper needs assessment that can pass the GMA requires extensive data requirements and this procedure is generally subjective. It is not recommended that Clark County adopt this as a point of analysis to support the total land area for designation. Rather, it is prudent to re-evaluate all of the county lands and apply a consistent set of agricultural land designation criteria to establish which lands pass the test of having characteristics of long-term agricultural production capacity.

The original tests for what constitutes agricultural lands is defined in GMA and is assisted by the 10 factors delineated by CTED. The latest Supreme Court ruling provides ample guidance for Clark County to establish its own set of agricultural land designation criteria. The Board of Clark County Commissioners to date has not adopted any new criteria for designation of agricultural land in the county.

¹³ Washington Supreme Court, docket number 76553-7, August 10, 2006.

¹⁴ See Appendix D for the guidelines from CTED.

Agricultural Land in Clark County

This section reports on the type and location of agricultural land in the county, with particular emphasis on the expansion areas proposed as Alternatives 2 and 3 for the Comprehensive Plan, which includes land in the Preferred Alternative.

The latest Agriculture Census estimates that there was 70,694 acres of land in farms in 2002. This census also estimates that 22,896 acres were in harvested cropland, and 4,752 acres were irrigated. Some people believe only the more intensive farmed land is agricultural while others are inclined to count any agricultural related use in the total.

Using the most recent Clark County current use tax assessment data as a guide gives a very different estimate of the county's agricultural land area. The latest estimate from Clark County is that there are 48,457 acres enrolled in either Farm or Agricultural use designation. Note that this estimate includes parcels which have a portion of the land area enrolled in Open Space or Forest or Timber tax designation as well as Farm and Agricultural, so there is potential for land to be counted as Farm or Agriculture when it is in fact in one of these other classifications.

These differences in tallying agricultural acreage point out why there can be discrepancies in discussions about the amount of agricultural land that is available or used for agricultural purposes. The types of agricultural activity and the definition of what constitutes commercial farming have much to do with determining the size of the land base that exists in the county.

Land in the Expansion Areas that are in the Agriculture Zone at the Current UGA Boundaries

Data on the extent of lands that adjoin the current UGAs and are in the expansion areas is given in Table 4. This data shows the amount of land in parcels which are in either Alternative 2 or 3 and are in the Ag-20 zone and abut the current UGA boundaries.

Table 4 – Characteristics of Land in the Ag-20 Zone and in Expansion Areas that are Adjacent to the Current UGAs

Alternative	No. of Parcels	No. of Parcels With Buildings	Total Acreage	Acreage Adjacent to UGA
Alternative 2	73	43	1,370	18.7
Alternative 3	16	2	580	35.2

Source: Clark County GIS, October 16, 2006

Agricultural Land in the Expansion Areas

Clark County GIS provided photo interpretation of aerial photos taken in 2005 in the Alternative 2 and 3 expansion areas. Twelve types of "open" land uses were classified for the land within each alternative. Table 5 shows the resulting acreages by type of land use for Alternative 2, and Table 6 shows this data for Alternative 3.

Table 5 - Type of Land Use in the Alternative 2 Expansion Area		
Land Use	Number of Parcels	Acreage
Brush	9	19.9
Built	274	458.3
Christmas Trees	7	68.2
Cultivation	1	0.9
Forested or Woodland	120	836.9
Golf Course	5	138.2
Hay	116	1,638.8
Nursery	2	6.4
Open Space	80	241.3
Pasture	89	929.6
Perennial Crops	13	165.4
Water/Wetland	1	19.3
Total All Uses	717	4,523.1
Total Ag Uses	228	2,809.2

Note: Perennial crops include orchards, vineyards, or other long term plantings.
 Source: Clark County GIS, October 9, 2006.

Table 6 - Type of Land Use in the Alternative 3 Expansion Area

Land Use	Number of Parcels	Acreage
Brush	23	85.7
Built	131	177.2
Christmas Trees	2	3.3
Cultivation	0	0
Forested or Woodland	135	659.2
Golf Course	0	0
Hay	88	976.2
Nursery	6	20.5
Open Space	53	149.9
Pasture	79	973.1
Perennial Crops	23	216.9
Water/Wetland	17	71.5
Total All Uses	557	3,355.5
Total Ag Uses	198	2,192.0

Note: Perennial crops include orchards, vineyards, or other long term plantings.
 Source: Clark County GIS, October 9, 2016.

Using the 2002 Agricultural Census as a guide, if there was 70,000 acres of agricultural land in Clark County in 2002, currently the county would have approximately 65,000 to 68,000 acres in agricultural use. Using the mid-point of 66,500 acres as the current total agricultural land base, the agricultural land within the expansion areas of Alternative 2 account for about 4.0 percent of the county's total agricultural land. Similarly, the Alternative 3 agricultural land area is about 3.3 percent of the county's total agricultural land.²⁴ Note that this is only based on land use calculations; this is not a calculation of lands used for commercial agricultural production.

Farms within the Cities and in Expansion Areas

Apart from the Ag Census, a different way to look at agriculture in the expansion areas is to analyze this in terms of the individual farms that have been identified in the Clark County database and assess their location relative to the Preferred Alternative. Figure 8 and the maps in Appendix A show the location of farms in relation to the existing city boundaries, the 2004 adopted UGB and the proposed Preferred Alternative UGA boundaries.

²⁴ The agricultural land in the expansion area is considered to include land in Christmas trees, cultivation, hay, nursery, pasture and perennial crops.

There are 51 separate parcel ownerships associated with the farms identified in the Clark County database. Twenty parcels comprising about 153 acres are currently within city boundaries of the cities. Another 17 parcels with 120 acres are within the 2004 adopted UGA and 14 parcels with 594 acres are within Preferred Alternative UGA (see Figure 8 and Table 7). In total there are 51 parcels with 865 acres that are currently within city boundaries or inside the 2004 UGA boundaries or within the Preferred Alternative boundaries.

Table 7 – Number of Parcels and Acres in Identified Farms By Jurisdiction

Jurisdiction	Location	Number of Parcels	Acres
Battle Ground	Within City	0	0.0
	In Adopted UGA	3	6.7
	In Preferred UGA	0	0.0
Carnas	Within City	2	6.5
	In Adopted UGA	0	0.0
	In Preferred UGA	1	18.6
La Center	Within City	0	0.0
	In Adopted UGA	1	25.4
	In Preferred UGA	0	0.0
Ridgefield	Within City	1	1.5
	In Adopted UGA	2	32.8
	In Preferred UGA	5	217.1
Vancouver	Within City	17	144.9
	In Adopted UGA	11	53.3
	In Preferred UGA	7	335.1
Washougal	Within City	0	0.0
	In Adopted UGA	0	0.0
	In Preferred UGA	1	23.6
Totals	Within City	20	152.9
	In Adopted UGA	17	120.4
	In Preferred UGA	14	594.3
Grand Total		51	867.6

Source: Clark County GIS

Another key is the comparison of farm acreage within the Preferred Alternative area to the total farm acreage in the county that is associated with the 145 farms. The 868 acres within the cities' incorporated boundaries, adopted UGAs, and the Preferred Alternative is about 28 percent of the 3,115 acres in all 145 farms.

Appendix A shows a series of maps at a large scale showing the city boundaries, the adopted UGA boundary (2004) the Preferred Alternative boundary for each city, zoning for land generally outside the city limits, and the location of identified farms. These maps show several farms are within existing city limits as well as the adopted UGA and the Preferred Alternative UGA. They also show the location of the farms which are in close proximity to the Preferred Alternative UGA.

Agricultural Current Use Tax Land in Expansion Areas

Within Alternative 2 expansion areas, there are 108 parcels that are in current use tax designation and have been identified through the 2005 aerial photos as having agricultural use. These lands have not been studied to determine their degree of use for commercial agricultural production. One other parcel was planted to Christmas trees. Three parcels were indicated to have cultivation (i.e. the land was plowed or disked for crop planting). Three were primarily wooded but also had agricultural use indicated. Twenty-two parcels had pasture as the primary use, 27 had grass hay production as the primary use and 52 others were "fields" whose specific use was not determined from aerial photo interpretation.

Within Alternative 3 expansion areas, there are 74 parcels that are in current use tax designation and appear to have some degree of agricultural use or use potential. Two of the parcels were cultivated and probably were being prepared to plant some type of crops. Nine have primarily wooded cover but also have some agricultural use, 12 are primarily in pasture, 22 are in hay production, and 29 are primarily "fields" with unknown specific agricultural use.

Location of Land in Current Use Taxation

There is an extensive amount of land in farm and agricultural designation for current use taxation in Clark County. These lands have been mapped in GIS and they are shown in Figure 10. The lands in either farm or agricultural designation are indicated as either coming into the program prior to 1994 or in 1994 or after. The year 1994 was chosen because this was the year that the agricultural land zone from GMA was first established in Clark County and it serves as a useful milestone year to measure the trend in lands coming into the program. Figure 10 shows that the recently added current use lands are broadly dispersed in the county. Most of the current use farm and agriculture lands that are within the boundaries of the Preferred Alternative entered the current use program prior to 1994.

This data includes only parcels that are still active in the current use program. Lands that have been withdrawn are not tracked in the GIS system so no data is presented on the acreage that has been withdrawn from current use for farm or agriculture.

Farmland & Agriculture Current Use Preferred Urban Growth Area Clark County, Washington

Key

PERCENT YEAR ASSESSED FARM & AGRICULTURE

Prior to 1994

1994 to Present

Preferred UGA boundary

Adopted 2004 UGA boundary

City Limits

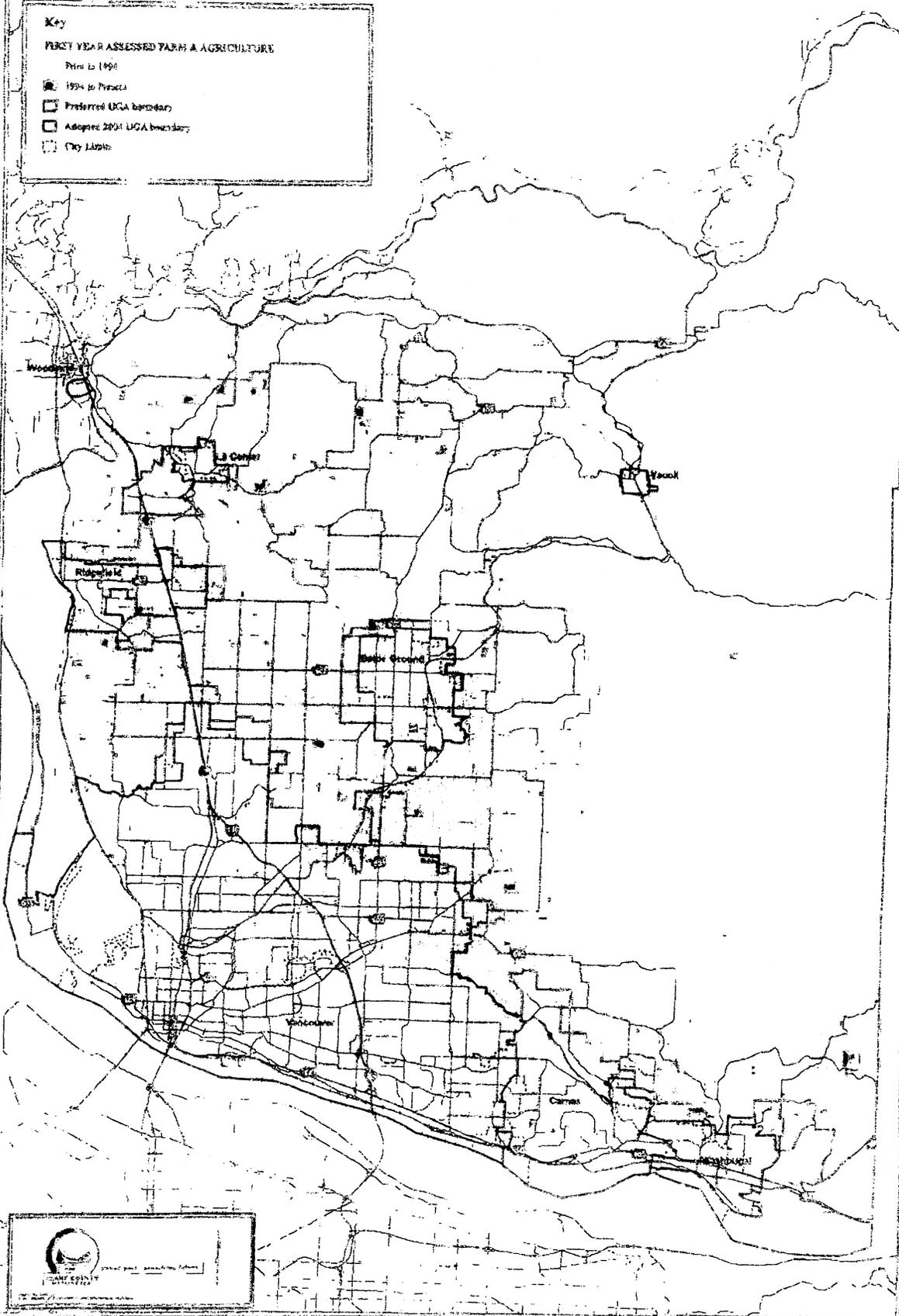


FIGURE 10

From early 1970's up to 1994, 46,309 acres were classified farm or agricultural and remain in the program. From 1994 to 2006 there has been 2,148 acres added to the farm and agriculture designation and remain in the program. Table 8 provides a further breakdown of the acreage and number of parcels added to this land designation since 1994. Table 8 shows a clear trend that property owners are placing fewer acres in farm or agriculture designation over time. In the 1995 to 2005 period, the greatest amount of land placed in the program was 546 acres in 1996-1997. Since then the next highest two year period was 2000-2001 with 318 acres added. The number of parcels placed in the program is also trending downward. Only partial year data is available for 2006.

Table 8 - Land Added in Farm and Agriculture Current Use Designation in Clark County, 1994 to 2006

Years	Acres Added	Number of Parcels	Average Parcel Size
1994-1995	532.01	43	12.4
1996-1997	545.37	61	8.9
1998-1999	283.27	23	12.3
2000-2001	318.39	32	9.9
2002-2003	187.81	18	10.4
2004-2005	257.64	19	13.6
2006	24.06	7	3.4
Totals	2,148.54	203	10.6

Note: This data includes only land presently in the current use program. Parcels withdrawn from current use are not included.

Source: Clark County GIS

Location of Agricultural Land in Current Use Taxation Relative to Agriculture Zoning

The county's GIS program was used to determine the extent and location of land in Farm and Agricultural land classification and this was compared to the agricultural land zone (Ag-20). There are a total of 956 parcels comprising 16,569 acres in Clark County's current use program for Farm and Agricultural lands.¹⁶ Approximately 6,700 acres in 328 parcels which are in Farm and Agricultural land classification are also in the Agriculture 20 zone. This represents about 40 percent of the total land in Farm and Agricultural land classification in Clark County. The remaining 60 percent of land in Farm and Agriculture current use is located across other

¹⁶ Parcels are excluded which have compensatory taxes due because the land is coming out of Farm and Agricultural land classification. Some parcels have several current use land classifications (e.g. Open Space, Farm and Agriculture, or Timber Land) and Designated Forest Land. These parcels with multiple classifications are counted as Farm and Agricultural land even if a portion is in Designated Forest Land. Therefore to a small extent the data presented overstates the amount of land in Farm and Agricultural classification.

Agricultural Land in Clark County

land use zones. The two principal zones which include Farm and Agriculture land are the Rural five acres (R-5) zone and the Rural ten acres (R-10) zone. The R-5 zone has 341 parcels with 3,371 acres of Farm and Agriculture current use land and the R-10 zone has 137 parcels with 2,184 acres of Farm and Agriculture Land. The remaining 173 parcels with 5,377 acres are widely distributed among all of the other land use zones.

Current Contributions of Agriculture to the Economy of Clark County

This section describes the characteristics of Clark County's present agricultural economy, beginning with descriptive data on employment and agricultural businesses. Analysis is then presented for how the removal of all agricultural land by expansion of UGAs under Alternatives 2 and 3 would impact related sectors such as food processing as well as the indirect and induced economic losses that affect the entire local economy. Later in this report, analysis is given of changes in the county's agricultural economy from 1994 to 2004 and data is presented for agriculture's contributions relative to the total economy of Clark County.

Covered Employees and Establishments

The Washington State Employment Security Department tracks the number of agricultural employees that meet unemployment insurance requirements. These covered employees' can include workers on corporate farms, regular (steadily employed) workers on small farms and proprietors who choose to pay into the unemployment insurance system. The Employment Security Department also tracks the number of farms reporting to the unemployment insurance system (covered employment), and the annual reported employee earnings (covered earnings). Because many farm proprietors do not opt into the unemployment insurance program and temporary workers do not meet unemployment insurance requirements, Washington State Employment Security Department employment figures under estimate the actual number of agriculture workers in Clark County. However, the covered employment numbers are included to provide a minimal count of the county's agricultural workforce and farms and this gives a reasonable directional trend for employment over time.

Table 9 shows covered employment data for the four-year period 2002 to 2005. In 2005 there were 454 covered employees in agriculture, with 319 working in crop production and 135 working in animal production. The average crop production worker earned \$15,263 (up from \$11,257 in 2002), while the average animal production worker earned \$23,186. The difference in earnings is probably due to the seasonal nature of crop production. In 2005 there were 88 agricultural farms reporting, 64 of which were producing crops (down from 67 in 2002) and 24 were raising animals.

Covered food manufacturing workers are also included in Table 9. There were 29 reporting food manufacturing farms in 2005 with 1,103 employees earning an average of \$41,514 annually.

Table 9 – Agricultural and Food Manufacturing, Covered Employment, Average Earnings and Reporting Establishments in Clark County, 2002-2005

	2002	2003	2004	2005
Average Agricultural Employees	454	449	460	454
Crop Production	331	333	339	319
Animal Production	123	116	121	135
Average Annual Agricultural Earnings	\$14,430	\$14,247	\$16,402	\$17,619
Crop Production	\$11,257	\$11,307	\$12,525	\$15,263
Animal Production	\$22,969	\$22,690	\$23,465	\$23,186
Agricultural Firms Reporting	91	90	86	88
Crop Production	67	67	63	64
Animal Production	24	23	23	24
Average Food Manufacturing Employees	1,150	1,183	1,140	1,103
Average Annual Food Manufacturing Earnings	\$37,817	\$37,939	\$42,277	\$41,514
Food Manufacturing Firms Reporting	29	32	29	29

Source: Washington State Employment Security Dept., Covered Employment and Wage Series (ES-202).

Community Economic Impacts

In this study an "Impact Analysis for PLANing" (IMPLAN) economic impact analysis model of Clark County is utilized to determine the direct, indirect and induced impacts of the loss of agricultural acreage under Comprehensive Plan Alternatives 2 and 3. See Appendix B for a brief discussion of the impact analysis methodology.

This assessment assumes that all agricultural land inside the growth management area is completely removed from production. It also assumes that the diminished production is not replaced elsewhere in the county. Note that this assessment also does not consider resulting economic impacts from future uses of the removed agricultural land. The additional contributions to the economy of Clark County from the new land uses could be very substantial, especially if significant land area is devoted to industrial uses which bring new jobs.

Current Contributions of Agriculture to the Economy of Clark County

Several negative impacts ensue from the loss of agricultural lands that would lead to other economic losses in the county. First, workers on some farmland would lose their jobs and earnings and this would mean their household consumption and expenditures would decrease in the local economy. This leads to direct, indirect and induced losses of jobs and income by others in the county.

A second direct impact results from the reduction in local business purchases by affected farmers. Some local businesses and individuals that rely on purchases from farms would in turn terminate employees and this would ripple through the local economy with further negative impacts.

The value of agricultural output that would be removed under Alternatives 2 and 3 was estimated using two steps. First, Clark County GIS data was used to estimate how many acres of each type of crop would be reduced under each alternative. The acres removed were converted into percentages of that crop's total acreage. The percentage of acreage removed from each crop was then used to estimate the value of removed production, based on the IMPLAN crop output levels. Each crop's reduced value was then entered in the IMPLAN model. See Table 10 for these reductions.

Table 10 - Estimate Value of Direct Agricultural Output Production Loss in Clark County Under Comp Plan Alternatives 2 & 3, 2006

Alternative	Alternative 2	Alternative 3
Vegetable & Melon Farming	-\$6,120	\$0
Fruit & Berry Farming	-\$1,036,920	-\$1,468,970
Greenhouse & Nursery Farming ¹	-\$948,600	-\$1,384,980
Hay & Other Crop Farming	-\$739,550	-\$316,950
Cattle Ranching & Dairy	-\$1,084,050	-\$1,192,460
Total Direct Loss	-\$3,816,240	-\$4,363,340

¹Greenhouse & Nursery Farming include Christmas tree farms.

Source: IMPLAN model economic analysis

A summary of the total loss to Clark County's economy from the agricultural land losses is presented in Table 11. For both Alternative 2 and Alternative 3 of the Comp Plan, economic impacts are given as direct impacts, indirect and induced impacts, and total impacts. Direct impacts are the value of agricultural production loss stemming directly from the reduction of agricultural acreage assuming each alternative was adopted and brought into the UGAs. Indirect impacts are the losses to businesses that supply goods and services to the agricultural production industry. Induced impacts are losses to businesses resulting from the lost earnings of workers in directly and indirectly affected industries. Therefore induced losses reflect the diminished spending power of employees. Total impacts are the sum of direct, indirect and induced losses.

Each row in Table 11 shows the means through which the county is economically affected. Output is the total production value lost for all industries under the scenarios. Other property income is the loss of corporate profits, and the loss from interest, rents, dividends and other non-labor income sources. Indirect business taxes are excise and sales taxes paid by individuals to business during their everyday transactions. Negative indirect business tax figures indicate a loss of government revenue. Labor income is the earnings and benefits received by employees, including self-employed workers. The employment figure is the loss of full and part-time jobs in the county, including self-employed workers.

Table 11 - Summary of Clark County's Total Economic Impact Due Solely to Loss of Agricultural Acreage Under Comp Plan Alternatives 2 & 3, 2006

	Comp Plan Alternative 2			Comp Plan Alternative 3		
	Direct Impact	Indirect & Induced	Total Impact	Direct Impact	Indirect & Induced	Total Impact
Output	-\$3,815,240	-\$1,537,698	-\$5,352,938	-\$4,353,340	-\$1,791,580	-\$6,154,920
Other Property Income	-\$876,976	-\$358,171	-\$1,235,147	-\$960,166	-\$415,239	-\$1,375,398
Indirect Business Taxes	-\$85,323	-\$85,546	-\$170,869	-\$95,827	-\$99,817	-\$195,644
Labor Income	-\$979,295	-\$439,055	-\$1,418,351	-\$1,229,012	-\$518,284	-\$1,747,296
Employment	-62	-16	-88	-99	-18	-118

Source: IMPLAN using 2004 Clark County data.

A detailed estimate of the amount of tax revenue lost to the state and county from the loss of agricultural land is presented in Table 12. The total tax revenue lost under Alternative 2 is estimated to be \$187,826. Over half of this loss is from sales tax loss (estimated at \$95,346) and almost a fourth is from an estimated \$42,719 loss of property taxes. The total tax revenue lost under Alternative 3 is estimated to be \$215,204. The loss of sales tax revenue is \$109,189, and the loss of property tax revenue is \$48,975. Again, the reader is reminded that this analysis is not considering the contributions that other land use will add to the county economy. This is merely addressing the losses from the loss of agricultural production if agricultural land is completely removed in the two expansion areas.

Table 12 – Summary of State and Local Tax Impacts Due Solely to Loss of Clark County Agricultural Acreage Under Comp Plan Alternatives 2 & 3, 2006

State and Local Taxes	Alternative 2	Alternative 3
Sales Taxes	-\$95,346	-\$109,189
Property Taxes	-\$42,719	-\$48,975
Unemployment & Workers Comp.	-\$760	-\$957
Other Taxes	-\$11,490	-\$13,209
Motor Vehicle License	-\$2,515	-\$3,012
Fees, Fines and Donations	-\$10,641	-\$13,071
Dividends	-\$24,055	-\$26,791
Total State & Local Taxes	-\$187,826	-\$215,204

Source: IMPLAN using 2004 Clark County data.

Agriculture and the Clark County Economy – Changes from 1994 to 2004

Agriculture's changing economic relation to the rest of Clark County's economy is best viewed relative to changes happening in the entire county economy. Descriptive IMPLAN models of the county were created for 1994 and 2004 to assess these changes. The resulting aggregated industrial tables are presented in Appendix C, and the following descriptions of Clark County's economy closely follow Tables C-1 and C-2 presented in the Appendix. Dollar figures are in 1994 and 2004 dollars respectively, and have not been adjusted for inflation. These tables were created using different sectoring schemes making direct comparison of individual sectors difficult. A brief explanation of this is given at the bottom of Appendix C.

Agricultural Sector Changes

Clark County grew rapidly in the period from 1994 to 2004, both in population and in the size of its economy. Although population increased nearly 40 percent, the local economy was able to expand to meet the demands of that growth. The county's total industrial output nearly doubled in this period from just over \$11 billion in 1994 to nearly \$20.3 billion in 2004. Labor income also nearly doubled from \$3.6 billion in 1994 to \$6.8 billion in 2004. Other value added, which includes corporate and property income as well as taxes, increased from \$2.4 billion in 1994 to \$11.2 billion in 2004.

The agricultural industry in Clark County has faced tremendous pressure from encroaching development and rising land costs in the last decade. These pressures have led to an overall loss of farm production. In 1994, Clark County's total agricultural output was nearly \$93 million, or 0.8 percent of total county output. By 2004, Clark County's total agricultural output had shrunk to \$83.6 million, which by now had become only 0.4 percent of Clark County's total output. Labor income, which includes wages and benefits, declined from about \$34 million in 1994 to \$21 million in 2004, a decline of 38 percent. Other value added however, which includes corporate profits, property income and indirect business taxes, increased over the same period from \$25 million in 1994 to \$40.7 million in 2004.

The crop production sector of agriculture was affected the most from agricultural land being taken out of production. Total crop production was \$52 million in 1994, and the crop sectors employed an estimated 1,286 people. By 2004, total crop production was less than half that at \$20.7 million, and now employed just 380 people. Some of this loss is due to the move of some traditional crop production into the greenhouse and nursery sector, which grew significantly over the decade. The greenhouse and nursery sector, which includes Christmas tree farms, increased output between 1994 and 2004 from about \$5.5 million to nearly \$19 million. That growth caused an estimated 415 increase in the number of greenhouse and nursery jobs. The growth of greenhouses and nurseries is an example of a growing agricultural sector in Clark County.

The beef and dairy cattle sector data presents an interesting contradiction that is most likely due to changes in the nature of cattle herds in the county. Cattle output fell from \$25.6 million in 1994 to \$21.6 million in 2004. At the same time, labor income decreased from almost \$12 million in 1994 to only \$1 million in 2004, yet employment rose from 270 in 1994 to 499 in 2004. The loss of labor income can be attributed mostly to proprietors, who lost 99 percent of their share of labor income between 1994 and 2004. Hired employee earnings in this sector decreased 49 percent over the same time period. The decreased proprietor income coupled with high employment level in the beef and dairy cattle sector suggests that a larger percentage of the county's cattle are being raised on small farms now, instead of in commercial sized herds. A theoretical example of a small cattle farm is a farmer who raises two steers, slaughters one for the household's consumption and sells the other. This farmer is counted as a cattle sector proprietor employee, and yet has little or no income to show for it.

The poultry and egg production sector grew from an output of almost \$5 million in 1994 to nearly \$15 million in 2004. The sector's employment grew as well, from 32 jobs in 1994 to 82 jobs in 2004. This sector, along with the greenhouse and nursery sector are the only agricultural sectors that have been able to significantly increase their production value over the last decade.

Other animal production increased from almost \$2.5 million in 1994 to \$4 million in 2004. There were an estimated 127 employees in this sector in 1994 and 307 employees in 2004. Other animal production includes pigs, sheep, goats, llamas, horses, rabbits and any other animal produced in the county. This sector may see growth if niche animal production in the county continues to grow.

The agriculture and forestry services sector is important to note. This sector includes horse stables, another business that may be directly affected by the removal of agricultural land. Unfortunately, this sector also includes logging which dominates the sector, so the change in commercial value of horse stables in the county is impossible to separate here. However, the agriculture and forestry services sector is included when reporting the agriculture industry output, employment, labor income and other value added totals.

Another industry that is often considered as part of agriculture's industrial complex is food manufacturing. Clark County's food and beverage manufacturing industry grew at a faster rate than Clark County's economy as a whole between 1994 and 2004. In 1994 the food manufacturing sectors produced \$308 million worth of food and beverages, almost 2.8 percent of the county's entire economy. By 2004 the industry had more than doubled its output to \$679 million, or 3.3 percent of the county's economy. Food manufacturing is not included when reporting agricultural industry totals.

Tables 13 and 14 provide more detail about specific Clark County crops and their economic contributions to the county. Table 13 shows detailed crop values for output, employment and labor compensation in 2004, and Table 14 shows the same for 1994. Once again due to changes in industrial classification, not all sectors are directly comparable.

Table 13 – Economic Contributions of Agriculture in Clark County, 2004

Agricultural Sector	Industry Output (\$,000s)	Total Employment	Labour Income (\$,000s)
Grain Farming	\$244	17	\$45
Vegetable & Melon Farming	\$1,223	19	\$382
Fruit & Berry Farming	\$8,641	187	\$2,316
Hay & Other Crop Farming	\$10,565	157	\$2,323
Greenhouse & Nursery Production	\$18,972	511	\$9,728
Cattle Ranching & Dairy	\$21,681	499	\$1,011
Poultry & Egg Production	\$14,767	82	\$2,285
All Other Animal Production	\$4,039	307	\$365
Totals	\$80,132	1,779	\$18,434

Source: IMPLAN and BEA Regional Economic Information System (Table CA25) using 2004 Clark County data.

Table 14 – Economic Contributions of Agriculture in Clark County, 1994

Agricultural Sector	Industry Output (\$,000s)	Total Employment	Labour Income (\$,000s)
Food Grains	\$123	4	\$50
Feed Grains	\$454	9	\$184
Vegetable & Farming	\$4,659	52	\$2,084
Tree Nut Farming	\$199	3	\$87
Fruit & Berry Farming	\$41,885	886	\$11,673
Miscellaneous Crops	\$19	1	\$7
Grass Seeds	\$168	19	\$33
Hay and Pasture	\$4,950	312	\$1,707
Greenhouse and Nursery Products	\$5,469	96	\$2,758
Cattle Ranching & Dairy	\$25,685	270	\$11,910
Poultry & Egg Production	\$4,949	32	\$1,264
All Other Animal Production	\$2,449	127	\$931
Totals	\$90,909	1,811	\$32,688

Source: IMPLAN and BEA Regional Economic Information System (Table CA25) using 1994 Clark County data.

The Food Manufacturing Industry

With the notable exception of a few sectors, the food manufacturing industry in Clark County purchases very little from local agricultural producers. Consequently, local agriculture benefits very little from the presence of the county's larger food manufacturing businesses. This divide between local agricultural production and local food manufacturing has increased over the past ten years.

Tables 15 and 16 show the food manufacturing sectors output for 1994 and 2004. The far right column shows the value of Clark County agriculture that is purchased by the manufacturing sectors. Once again, due to industry reclassification in 2001, the sectors may not be directly comparable.

Table 15 – Local Agricultural Contributions to Food Manufacturing Sectors, Clark County, 2004 (1,000s)

Food Manufacturing Sector	Sector Output (Sales)	Local Agricultural Supply
Fluid milk manufacturing	\$55,355	\$15,070
Animal, except poultry, slaughtering	\$10,474	\$3,910
Other snack food manufacturing	\$364,778	\$2,910
Ice cream and frozen dessert manufacturing	\$29,616	\$920
Meat processed from carcasses	\$8,199	\$550
All other food manufacturing	\$2,938	\$390
Fruit and vegetable canning and drying	\$15,496	\$340
Wineries	\$5,268	\$230
Poultry processing	\$452	\$190
Malt manufacturing	\$136,663	\$120
Coffee and tea manufacturing	\$464	\$50
Fats and oils refining and blending	\$1,753	\$40
Seafood product preparation and packaging	\$1,805	\$40
Bread and bakery product, except frozen	\$9,297	\$20
Other animal food manufacturing	\$4,547	< \$10
Mixes and dough made from purchased flour	\$258	< \$10
Totals	\$676,163	\$24,780

Source: IMPLAN using 2004 Clark County data.

Table 16 - Local Agricultural Contributions to Food Manufacturing Sectors, Clark County, 1994 (1,000s)

Food Manufacturing Sector	Sector Output (Sales)	Local Agricultural Inputs Supply
Malt	\$81,609	\$1,810
Canned Fruits and Vegetables	\$21,317	\$1,410
Meat Packing Plants	\$2,828	\$1,100
Potato Chips & Similar Snacks	\$170,059	\$1,100
Fluid Milk	\$24,518	\$370
Frozen Fruits, Juices and Vegetables	\$916	\$80
Wines, Brandy, and Brandy Spirits	\$960	\$80
Sausages and Other Prepared Meats	\$863	\$20
Ice Cream and Frozen Desserts	\$8,032	\$20
Other Prepared Feeds	\$2,182	\$20
Blended and Prepared Flour	\$856	< \$10
Bread, Cake, and Related Products	\$541	< \$10
Cookies and Crackers	\$7,541	< \$10
Confectionery Products	\$380	< \$10
Chocolate and Cocoa Products	\$1,977	< \$10
Animal and Marine Fats and Oils	\$693	< \$10
Malt Beverages	\$2,505	< \$10
Other Food Preparations	\$376	< \$10
Totals	\$308,162	\$6,010

Source: IMPLAN using 1994 Clark County data.

The largest purchaser of local farm production in 2004 was the fluid milk industry, which purchased about \$15 million worth of raw milk from the dairy sector. This includes the value of raw milk produced at integrated dairies that produce raw milk and bottle it themselves. The animal slaughtering sector was also a large purchaser of local farm production, utilizing \$3.9 million worth of local livestock. Custom slaughtering of privately raised livestock is included in this sector in 2004 and listed in Table 14, but is not included in meat packing plants sector in Table 15. Therefore, the value of farm grown livestock slaughtered in the county is underrepresented in the 1994 table. Another food manufacturing sector worth mentioning is canned fruits and vegetables which purchased \$1.4 million worth of local farm goods in 1994, but only \$340,000 in 2004. Discussions with local farmers reveal that this reduction from lost

Clark County fruit production that has been replaced with fruit procured from outside the county.

The dominating manufactured products in both 1994 and 2004 are snack chips and malt. These two sectors are responsible for over 75 percent of Clark County's manufactured food sales. The two main crop inputs needed for these products are processing potatoes and malting barley. Neither of these crops is commercially grown in Clark County. Therefore both of these processing sectors rely heavily on bringing in these raw product ingredients from outside the county. The effect of using imported crops means that, although the snack chip and malt manufacturing businesses are major employers and contributors to the local economy, they do little to directly support the county's agricultural industry.

Conclusions

In the first half of the twentieth Century, Clark County had a vibrant farm economy. For at least the last 30 years agriculture in Clark County has been in a long downward trend in production and farm profits. The mix of crops and livestock produced in Clark County is still diverse, but the farms are small and there are ever declining numbers of agricultural producers.

Many factors contribute to the decline in the county's agriculture. The most basic factor is that agricultural producers in other areas grow, process and market crops and products at lower prices that meet consumer demand.

One of the key obstacles in Clark County is the limited access to high quality agricultural land at an affordable cost. This impacts both existing farmers and potential new farmers. Few new producers are replacing those who have left the industry or are preparing to leave. Newer farmers have often adopted strategies of downsizing, renting land, or operating part-time. Additionally, apart from Extension and USDA programs, Clark County has very little in the way of support for farmers to combat the many forces that continually drive farmers to quit or leave the area. All of these conditions do not bode well for a secure future in farming.

Farmers can only sustain themselves when they are profitable. To be profitable in Clark



County, the costs of inputs used in the operation must be competitive, or farmers need higher prices and/or greater yields than their competitors. Demand by metropolitan area residents is growing for locally produced food and agricultural crops but this demand is not sufficiently strong to reverse the trends and allow farmers to expand with profitable operations in the county. The statistics show that Clark County farm income has continued to decline (Figures 1, 2 and 6).

There is little evidence that farmers are borrowing from either conventional or government lenders to establish new farms.

Commercial credit is not practical given the immense cost of purchasing land and other assets needed to establish a farm. The logical conclusion is that new farms are commonly self-financed. This explains why so many are small scale operations on acreages of two to ten or twenty acres. These farmers often earn a small farm income that supplements their other sources of income.

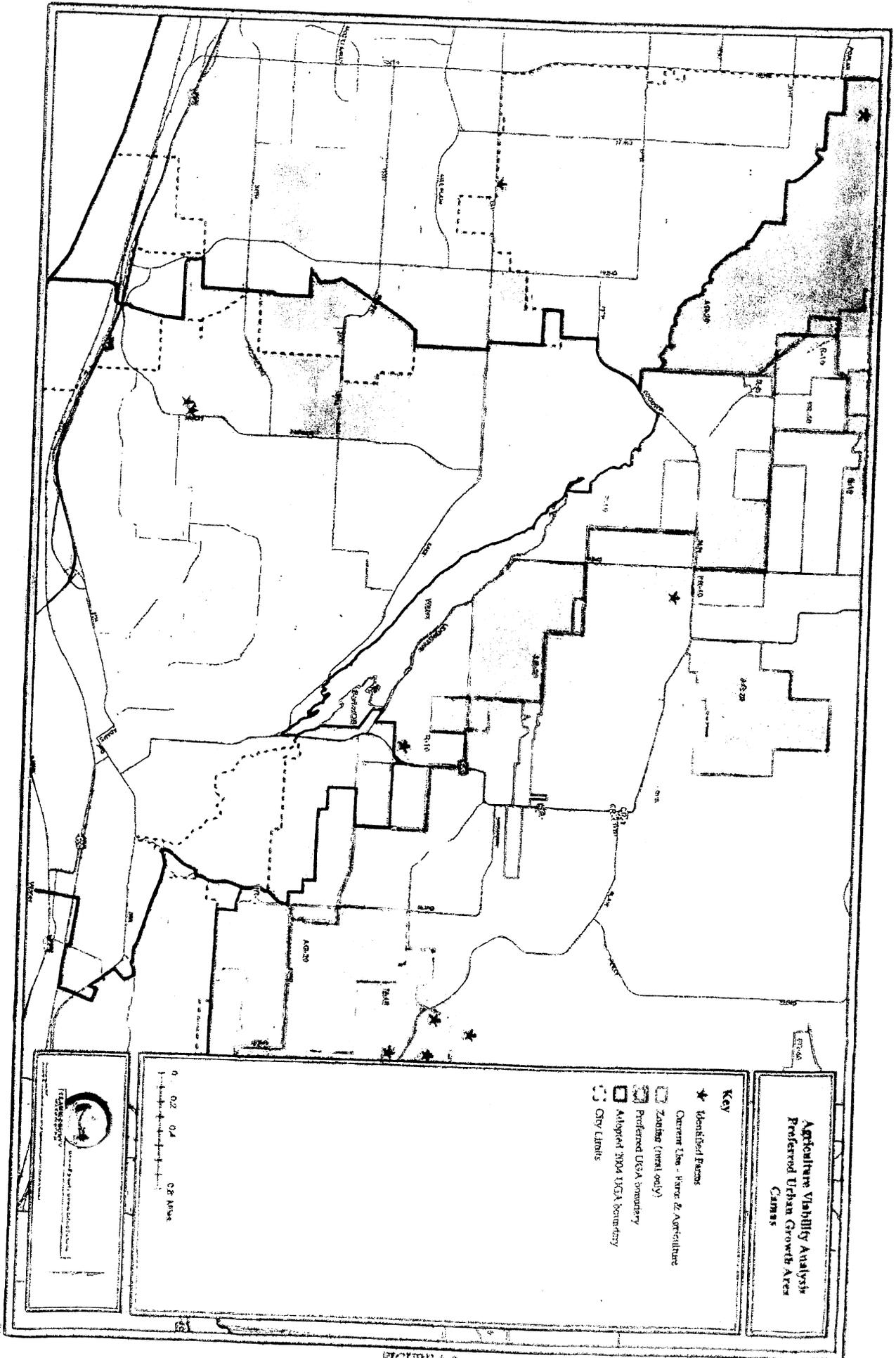
Significant intervention by government is required if farms in Clark County are to be saved. Programs must be quickly put in place if public policy is to keep land and farmers in the future. One example of a program is the purchasing of development rights on selected lands considered prime for farming. Purchasing development rights to land is not sufficient to sustain farming. As crucial as it is to keep land available, the most vital need is for much higher

demand by local residents for local farm and agricultural products. Government can exert little influence over consumer purchasing patterns.

Clark County can offer and implement a set of programs to support the income-producing needs of farmers. Public support for agri-tourism, regulatory relief and technical assistance, new market support and other programs may all be needed if a significant number of farmers are going to enter this business. Without a series of focused efforts and programs specifically designed to support farmers to a much greater degree, the downward trend of farming in Clark County will almost certainly continue.

In this context, loss of farms that are located within the expansion areas will only slightly contribute to the downward decline. However being inside the UGA does not necessarily mean the farms go out of business, since some farms (mostly nurseries) are within city boundaries. However, in many cases these urban-centered farms can be expected to cease operation. Their special challenge is that they are closest to development and least able to handle their higher costs, uncertain land tenure and land use incompatibilities. Most are small and are struggling to be competitive and remain in business. Existing agricultural zoning and programs of support are not sufficient to help these agricultural operations be competitive in order to remain in business for the longer term. Some are located on high quality soils but this is not uniformly true.

About 72 percent of Clark County's identified commercial agricultural land remains outside of the boundaries of the Preferred Alternative area. Out of the 145 identified farms in Clark County, there are 112 farms in production which are located outside of the boundaries of the Preferred Alternative. There are 11 identified farms located within the expansion areas of the Preferred Alternative and 22 farms within the current city limits or the 2004 adopted UGA boundary.

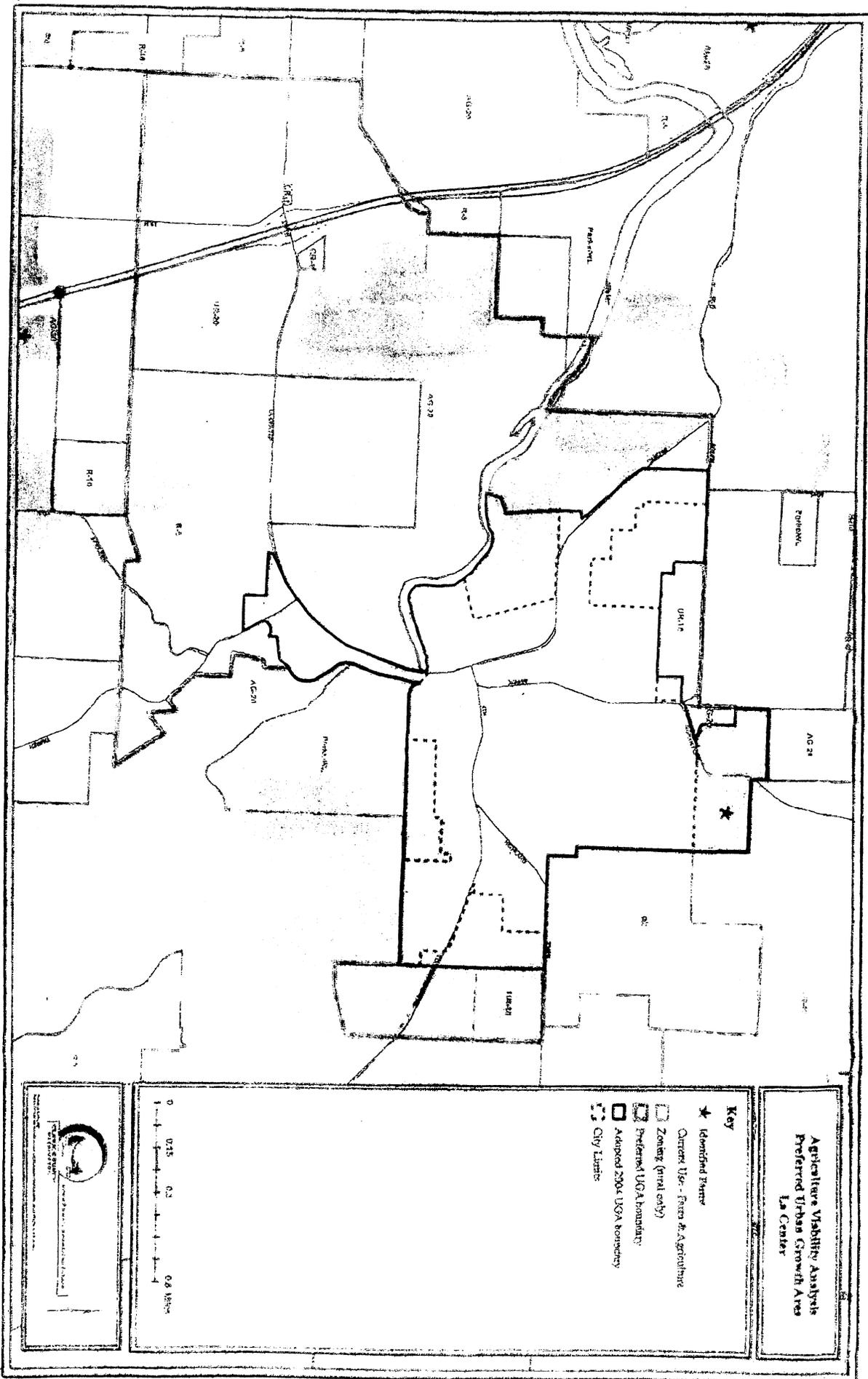


**Agriculture Viability Analysis
Preferred Urban Growth Areas
Cairns**

- KEY**
- ★ Identified Farms
 - ▭ Current Use - Urban & Agriculture
 - ▭ Zoning (rural only)
 - ▭ Preferred USA boundary
 - ▭ Adopted 2004 UGA boundary
 - City Limits



FIGURE A 2

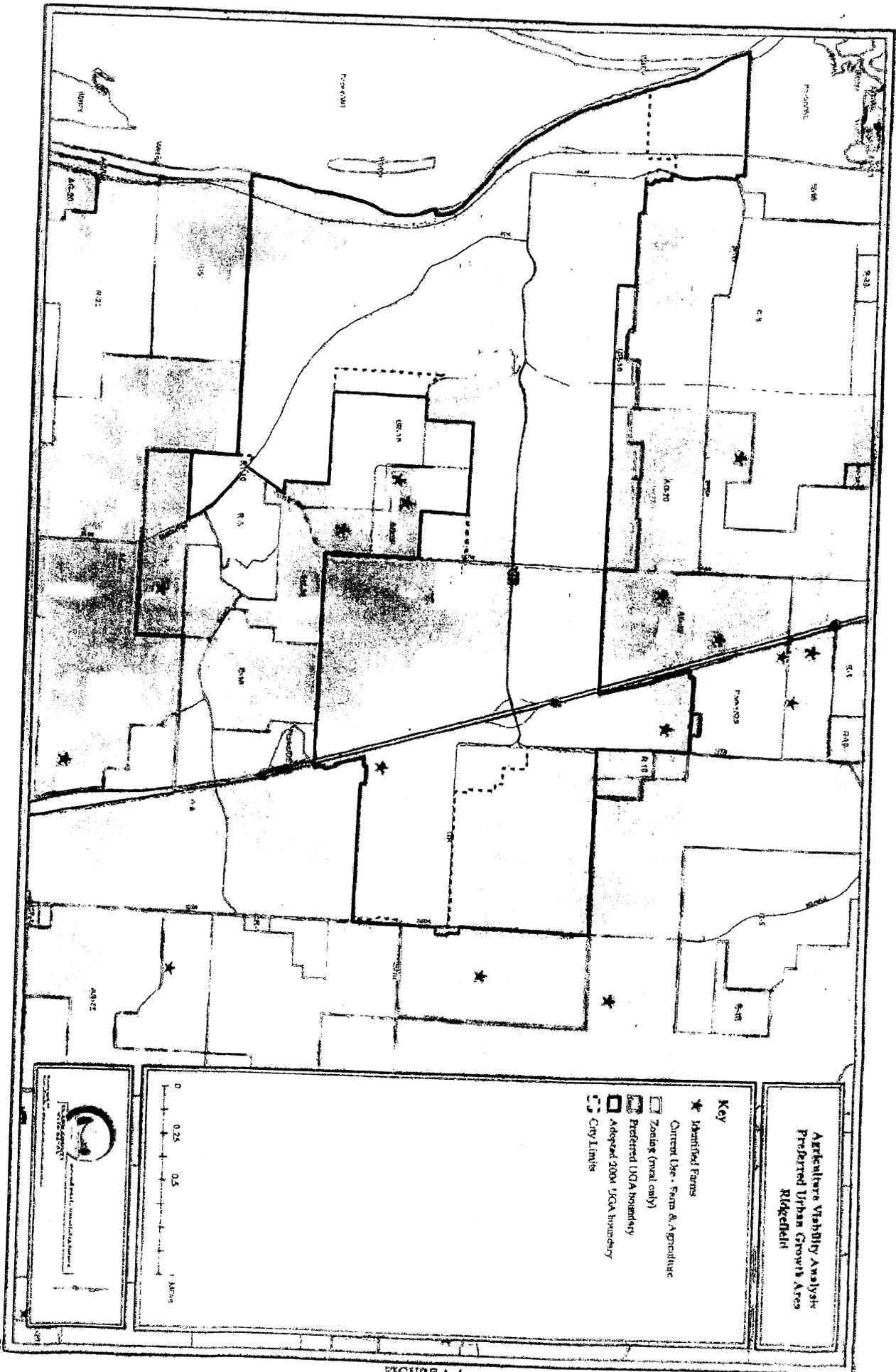


**Agriculture Viability Analysis
Preferred Urban Growth Area
La Center**

- Key**
- ★ Identified Farms
 - Current Use - Farm & Agriculture
 - Zoning (prior city)
 - Preferred UGA boundary
 - Adopted 2004 UGA boundary
 - City Limits



FIGURE A-3



**Agriculture Viability Analysis
Preferred Urban Growth Area
Ridgefield**

- Key**
- ★ Identified Farms
 - Current Use - Farm & Agriculture
 - Zoning (frazz only)
 - Preferred UGA boundary
 - Adopted 2001 UGA boundary
 - City Limits

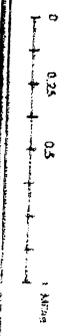


FIGURE A-4

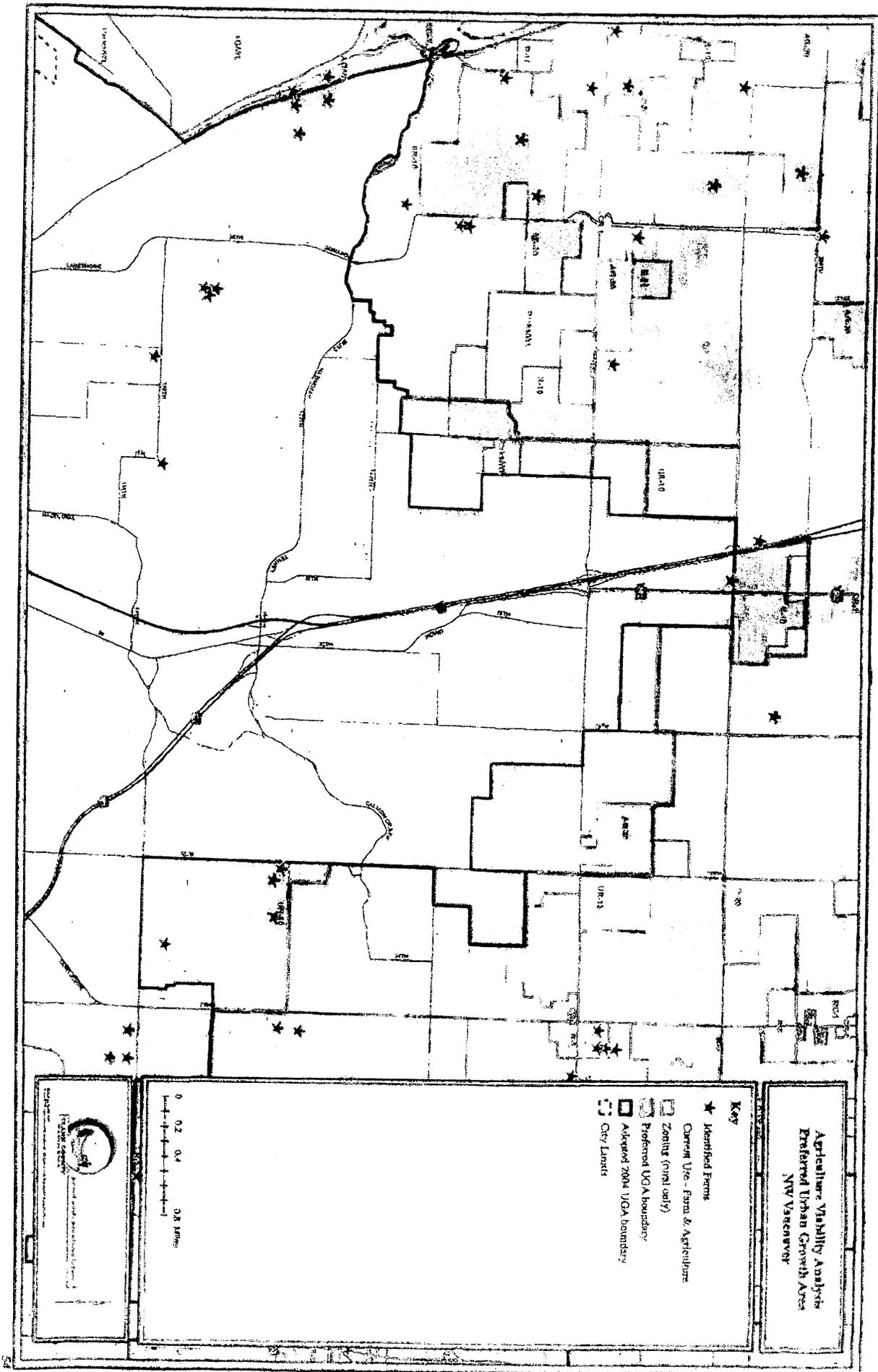


FIGURE A-5

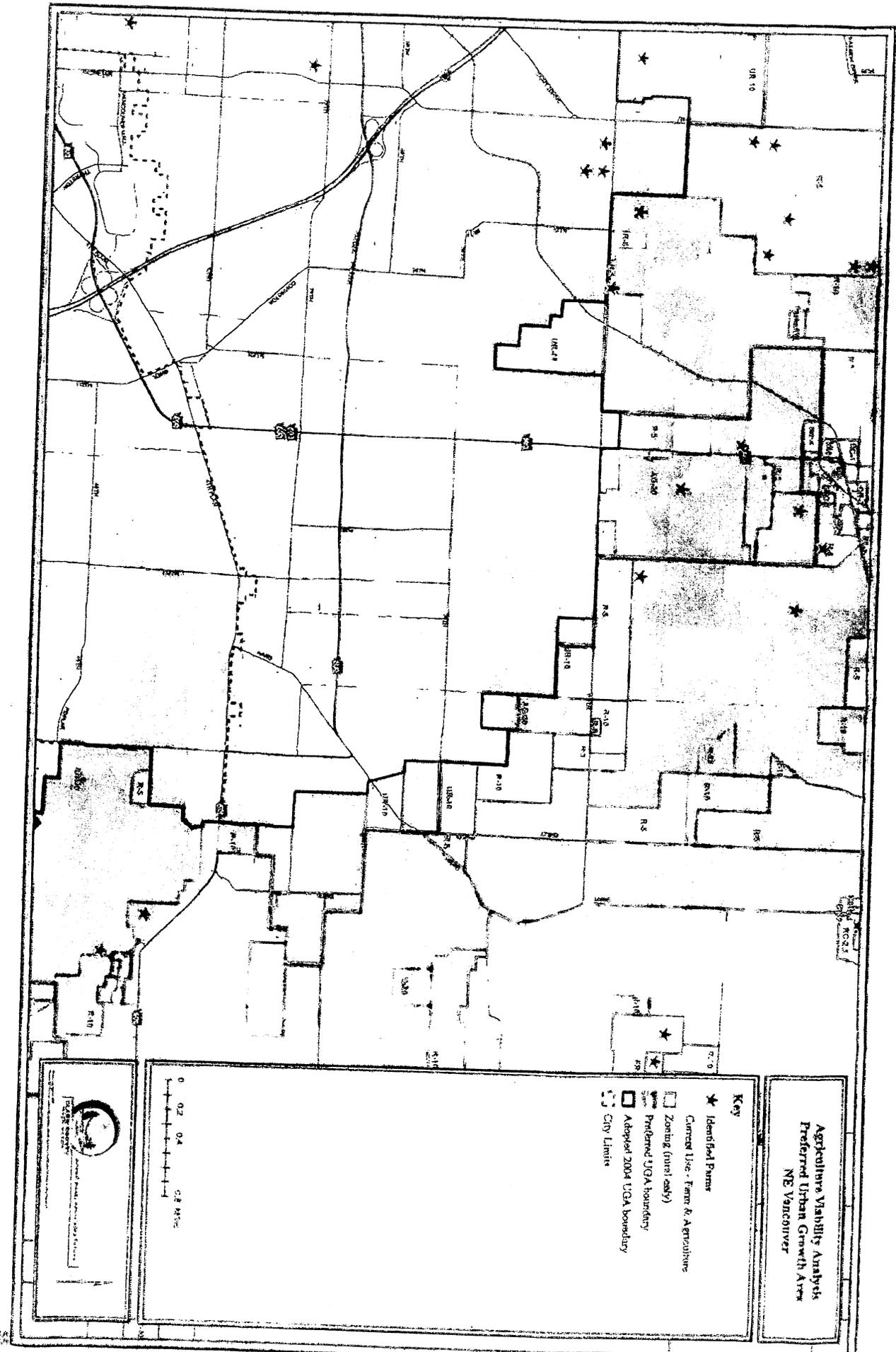
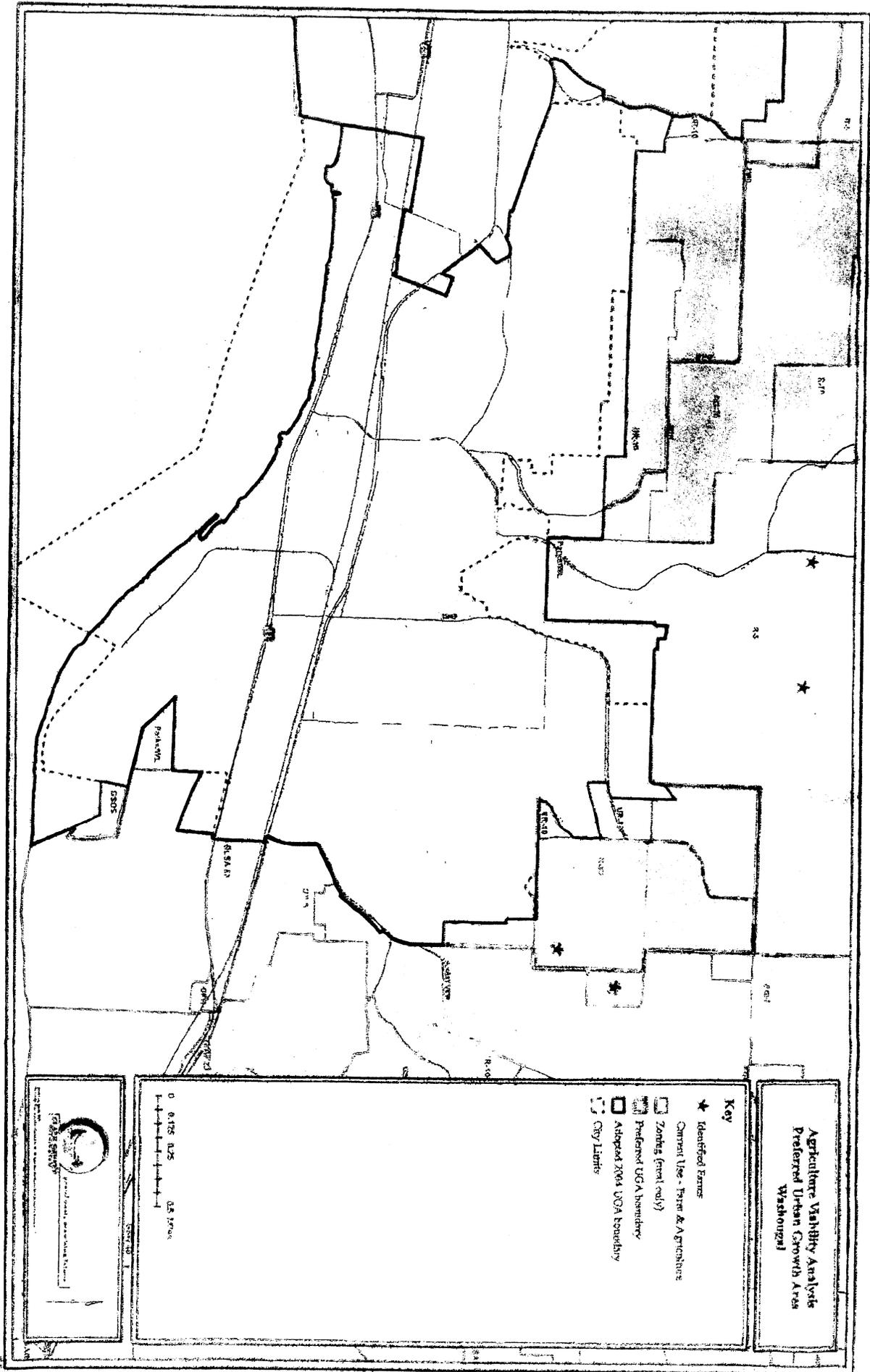


FIGURE A-6



**Agriculture Viability Analysis
Preferred Urban Growth Areas
Washington**

- Key**
- ★ Identified Farms
 - Current Use - Farm & Agriculture Zones (front only)
 - ▨ Preferred UGA boundary
 - ▧ Adopted 2014 UGA boundary
 - City Limits

0 0.125 0.25 0.5 Miles

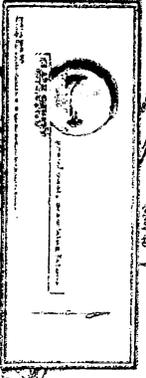


FIGURE A-7

Appendix B: Description of the Impact Methodology

The impact model used in this study is Impact Analysis for PLANing (IMPLAN). It was first developed by the U.S. Forest Service for land and resource management planning. The IMPLAN system has been in use since 1987 at the University of Minnesota. Its further development has been privatized at the Minnesota IMPLAN Group (MIG). The model of Clark County was specified with IMPLAN Pro Version and uses 1994 and 2004 county IMPLAN data.

The description model is based upon regional economic accounts. The accounts are tables of interactions that describe an economy by the flow of dollars from purchasers to producers within the defined region. The model is predictive in that multipliers define the response of the economy to a change in demand or production. Purchasers for final use (final demand) drive the input-output model. In this case, agriculture sectors are producing goods for final demand, either by local consumers, food manufacturers or export. The agricultural sectors also purchase goods and services from other producers, which also sets off further purchases of goods and services. These indirect purchases (known as indirect effects) continue until leakages from the region—such as imports, profits, or wages—stop the economic transactions within the region. Added to the impact of direct and indirect effects are induced effects. These are the effects of household spending in the regional economy.

This model of Clark County was specified with two modifications of the IMPLAN data provided by MIG. First, the total number of jobs in the agricultural industry was increased to match Clark County employment data from the Bureau of Economic Analysis. The number of jobs was distributed to each agricultural sector according to IMPLAN proportions. This adjustment was necessary because IMPLAN uses national job per output ratios to estimate agricultural employments. The national job-output ratios reflect large-scale commercial agricultural rather than the smaller farm operations that are typical in Clark County, and therefore would underestimate actual employment. The second modification was the increase of the fluid milk manufacturing sector's output, value added and employment figures in the 1994 model. This adjustment was made because that sector's 1994 IMPLAN data did not resemble a typical year for this sector in the early 1990's. No other modifications were made to key relationships such as trade flows, absorption coefficients, production functions or byproduct coefficients in the county data.

The model uses Social Accounting Matrices (SAM) based local relationships. Social accounting allows for consideration of non-industrial transactions such as payments of taxes by business and households. The comparison models are specified with year 1994 and 2004 data. The impact model is specified with 2004 data, which is the latest available, and price deflators are used to bring the impact estimates to 2006 prices.

Appendix C: Clark County Economic Sector Performance for 1994 & 2004

Table C-1 – Clark County Output, Employment, Labor Income and Other Value Added, 2004

Industry	Output (\$ Millions)	Employment	Other Value Added (\$ Millions)	Labor Income (\$ Millions)
Crop Production	20,673	380	5,065	12,227
Greenhouse & Nursery Production	16,972	511	9,726	14,621
Beef & Dairy Cattle	21,681	499	1,011	3,581
Poultry & Egg Production	14,767	82	2,265	7,155
Other Animal Production	4,039	307	0,365	0,640
Agriculture & Forestry Services	3,482	79	2,657	2,459
Forestry, Logging & Mining	108,126	582	29,940	54,632
Utilities	1,236,136	2,213	244,167	918,282
Construction	1,901,697	16,524	798,369	945,421
Manufacturing - Food & Beverages	679,163	1,193	67,820	173,687
Manufacturing - Miscellaneous	1,393,844	5,656	296,320	417,206
Manufacturing - Wood Products	1,524,888	3,576	274,281	468,461
Manufacturing - High Tech. & Related	1,182,322	4,956	277,403	328,199
Wholesale Trade	870,693	5,348	327,189	595,172
Transportation & Warehousing	607,462	5,230	237,046	315,057
Retail Trade	1,148,239	17,229	449,525	742,002
Information	783,970	2,585	172,133	384,666
Finance & Insurance	832,734	3,939	256,539	559,790
Real Estate & Rental & Leasing	1,016,043	6,272	223,250	610,217
Professional, Scientific, & Tech. Services	1,027,755	9,293	572,895	594,621
Administrative & Support Services	577,300	10,311	274,350	347,611
Educational Services	59,342	1,644	25,978	35,308
Health Care & Social Assistance	1,390,166	17,219	752,248	874,080
Arts, Entertainment & Recreation	201,189	3,197	71,552	126,397
Accommodation & Food Services	613,940	12,602	206,243	301,955
Other Services	658,130	10,138	262,332	375,105
Public Administration	1,227,031	20,039	964,597	1,102,010

Table C-1 - Clark County Output, Employment, Labor Income and Other Value Added, 2004

Industry	Output (\$ Millions)	Employment	Labor Income (\$ Millions)	Other Value Added (\$ Millions)
Special Sectors	1,072.764	0	0.030	870.073
Clark County Totals	20,296.552	161,613	6,805.265	11,180.613
Agricultural Totals	83.624	1,858	21.091	40.683

Source: IMPLAN using 2004 Clark County data.

Table C-2 - Clark County Output, Employment, Labor Income and Other Value Added, 1994

Industry	Output (\$ Millions)	Employment	Labor Income (\$ Millions)	Other Value Added (\$ Millions)
Crop Production	52.457	1,286	15.826	18.638
Greenhouse & Nursery Products	5.469	96	2.758	1.626
Beef & Dairy Cattle	25.585	270	11.910	3.154
Poultry & Egg Production	4.949	32	1.264	1.398
Other Animal Production	2.449	127	0.930	0.494
Agricultural & Forestry Services	2.041	120	1.311	0.002
Forestry, Logging & Mining	58.614	974	22.757	13.753
Construction	1,161.703	13,768	436.912	225.704
Manufacturing - Food & Beverages	308.161	1,161	48.208	70.887
Manufacturing	3,222.751	16,699	780.897	524.039
Transportation & Communication	693.362	5,127	167.421	137.399
Trade	1,925.624	26,843	559.651	297.071
Finance, Insurance & Real Estate	1,513.785	8,354	149.453	603.035
Services	1,480.837	31,509	776.022	178.264
Government	1,213.790	18,577	631.964	118.411
Other	-6.675	744	5.035	-11.910
Clark County Totals	11,064.702	127,685	3,608.321	2,381.967
Agricultural Totals	92.950	1,931	33.989	25.313

Source: IMPLAN using 1994 Clark County data.

The figures reported here are in 1994 dollars and 2004 dollars respectively.

An important note needs to be made about industrial classification in Tables B-1 and B-2. The 1994 table is organized using the Standard Industrial Classification (SIC) sectoring scheme. IMPLAN replaced the SIC method of organization with the North American Industrial Classification System (NAICS) in 2001, and the 2004 data is organized under NAICS. The two classification systems are not directly comparable, which creates a problem when comparing Tables B-1 and B-2. However, every effort has been made to structure the agricultural sectors accordingly in these tables to ease comparisons within the agricultural sectors.

Appendix D: WAC Criteria for Agricultural Land Designation

The Washington Department of Community, Trade, and Economic Development has promulgated regulations in the Washington Administrative Code. This is to guide counties in determining agricultural and forest lands that have "long-term commercial significance" (see WAC 365-190-050,10).

This regulation states that counties shall also consider the combined effects of proximity to population areas and the possibility of more intense uses of the land as indicated by:

- a) The availability of public facilities;
- b) Tax status;
- c) The availability of public services;
- d) Relationship or proximity to urban growth areas;
- e) Predominant parcel size;
- f) Land use settlement patterns and their compatibility with agricultural practices
- g) Intensity of nearby land uses;
- h) History of land development permits issued nearby;
- i) Land values under alternative uses; and
- j) Proximity of markets.

Appendix E: Study Contacts

Dorothy Anderson, Washington Blueberry Commission
Rich Bachert, USDA Natural Resource Conservation Service
Joe Beaudoin, Joe's Place Farm
Ronny Bell, Pioneer Organics
Henry Bierlink, Washington Red Raspberry Commission
Steve Boynton, La Center Farm
Charles Brun, WSU Clark County Extension
Evelyn Casella, Christmas Creek Ranch
Laurie Conway, Conway Farm
Amy Cziske, Washington Cattlemen's Association
Ray de Vries, Ralph's Greenhouse
Ben Dobbe, Holland America Bulb Farms
Gary Fredericks, WSU Clark County Extension
Steve Frice, Frice's Berry Farm & Country Store
Merrill Firestone, Firestone Farms
Jack Giesy, Veterinarian
Peggy Gresham, Llama breeder
Erin Harwood, WSU Clark County Extension
Walt Hauser, Bethany Vineyards
Robin Harmon, Harmon Farm
Samantha Hatch, East Fork Nursery
Josh Hinerfeld, Organically Grown Company
Kent Hoddick, USDA National Agricultural Statistics Service
Bill Hodges, Bird's English Nursery
Jinger Jacobson, Washougal Farmers Market
Jane Larwick, Larwick's Christmas Tree Farm
Carol Miles, SW Washington Research & Extension Unit, WSU
Donna Moir, Heritage Bank
Chuck Natsuhara, USDA Natural Resource Conservation Service

Appendix E: Study Contacts

Tom Peerbolt, Peerbolt Crop Management
Jeffrey Peterson, USDA Farm Service Agency
John Petty, Riverwood Tree Sales Company
Ronna Pourd, Bank of America
Robert Ray, Vancouver Farmers Market
Carol Rounds, Columbia Bank FSB
Neal Schoen, Schoen Farm
Denise Smee, Clark Conservation District
Terri Smykowski, Clark County Saddle Club
Sandra Starbuck, USDA Farm Service Agency
Doug Steinbarger, WSU Clark County Extension
Sue Svendsen, Clark County Executive Horse Council
Glen Thornton, Thorntons' Treeland
John Trax, Northwest Nursery Buyers Association
Dale Waite, Realtor and Horse Trainer
Tim Wigren, Command Performance (Horse Trainer and Private Horse Stables)
John Wines, Washington State Employment Security Department
Blair Wolfley, WSU Southwest Washington Research & Extension Unit
Jim Youde, Y's Acres
Bill Zimmerman, Bi-Zi Farms

AGRICULTURAL OR FOREST ZONED PROPERTIES IN PREFERRED PLAN URBAN GROWTH BOUNDARY EXPANSION

AREA OF INTEREST	NUMBER OF PARCELS	RANGE OF PARCEL SIZE(S)	MEDIAN PARCEL SIZE	TOTAL ACRES	ZONING	% CRITICAL LAND SETBACKS	ENVIRONMENTAL CONSIDERATIONS	% PRIME AG SOILS	% PREFERRED FOREST SOILS	% FARM AND AG CURRENT USE	SEWER LINES WITHIN 300'
BA	3	16.4 - 32.04	25.85	78.90	AG-20	41.50%	Hydric soils, Riparian Habitat	28.15%	0.00%	74.09%	No
BI	36	0.85 - 42.84	9.87	347.40	AG-20	69.88%	Hydric soils, Riparian Habitat, Wetland	62.88%	14.73%	62.87%	Yes
CA-1	31	5.47 - 158.5	12.31	474.45	AG-20	61.78%	Hydric soils, Riparian and Non-Riparian habitat, floodplain, Wetland	56.21%	11.48%	31.28%	No
CA-2	6	0.1 - 89.46	31.71	184.24	FR-40	82.83%	Steep slopes, Non-Riparian habitat	28.58%	12.12%	0.00%	No
CB	17	0.2 - 86.86	23.86	432.15	AG-30	82.14%	Steep slopes, Wetlands, Riparian Habitat, Hydric soils	72.62%	18.20%	83.35%	No
CF	2	2.78 - 4.95	2.40	6.85	AG-20	15.56%	Steep slopes, Riparian Habitat	0.50%	0.28%	0.00%	Yes
LB-1	32	1.14 - 64.48	14.36	459.45	AG-20	68.88%	Hydric soils, Riparian and Non-Riparian habitat, priority species, floodplain, Wetland, steep slopes	62.65%	31.27%	36.50%	No
LB-2	24	0.34 - 66.92	9.76	244.82	AG-20	62.14%	Hydric soils, Riparian Habitat, Wetland	62.46%	66.41%	12.20%	No
LC	5	1.81 - 18.51	7.73	FR-17	AG-20	78.38%	Hydric soils, Riparian Habitat, Wetland	36.85%	38.88%	67.77%	No
RA	17	0.31 - 10.74	0.79	81.50	AG-20	47.18%	Hydric soils, Riparian Habitat, Wetland, Steep slopes	47.43%	47.43%	66.12%	No
RB-1	22	0.31 - 73.17	12.83	282.21	AG-20	35.48%	Hydric soils, Riparian Habitat, Wetland, Steep slopes	61.79%	53.04%	66.32%	No
RB-2	11	0.81 - 80.36	16.11	192.61	AG-20	56.87%	Hydric soils, Riparian and Non-Riparian Habitat, Priority species, Wetland	56.70%	50.70%	85.69%	No
RC	54	0.69 - 104.80	9.87	306.07	AG-20	65.33%	Priority species buffer, Riparian habitat, Wetland, Hydric soils	70.88%	70.88%	68.82%	No
VA	4	11.04 - 75.02	31.21	126.00	AG-20	25.35%	Hydric soils, Riparian Habitat, Wetland	66.83%	80.83%	59.68%	No
VB	35	0.19 - 222.16	22.42	764.72	AG-20	68.41%	Hydric soils, Wetland, Priority species buffer	79.20%	43.88%	84.07%	No
VC	2	18.62 - 18.83	19.23	31.76	AG-20	43.11%	Hydric soils	61.09%	0.00%	51.16%	No
VE	14	1.80 - 63.81	5.01	416.66	AG-22	31.30%	Shoreline buffer, Riparian habitat, Hydric soils	78.89%	18.11%	61.42%	Yes
WA	31	0.54 - 70.23	8.14	241.60	AG-20	34.17%	Hydric soils, Riparian Habitat, Wetland	65.81%	8.26%	68.72%	No
WB	7	37.41 - 78.85	68.03	118.08	AG-20	1.87%	Steep slopes, Riparian habitat	82.84%	82.84%	100.00%	No

Michael G. Langsdorf

ATTORNEY AT LAW
1915 WASHINGTON
VANCOUVER, WASHINGTON 98660

TELEPHONE: (360) 694-8121

Dec 9-20-06
RECEIVED SEP 20 2006
HEARING SUBMITTAL

TO BOARD OF COMMISSIONERS

WALKER FARMS IS OWNED BY JIM AND LAURIE WALKER AND DAVID CALLAHAM. IT IS A 103+ ACRE PARCEL, A PORTION OF WHICH FRONTS ON 10TH AVENUE AND A PORTION FRONTS ON 279TH. IT PRESENTLY IS USED FOR GROWING CORN AND RAISING PIGS.

A CLUSTER KNOWN AS HELEN'S VIEW IS LOCATED DIRECTLY TO THE NORTH OF THE PARCEL DESIGNATED AS WALKER FARMS. ATTACHED TO THIS PRESENTATION IS A COPY OF A PETITION SIGNED BY THE MAJORITY OWNERS OF HELEN'S VIEW AND SUBMITTED TO THE CLARK COUNTY PLANNING COMMISSION IN OCTOBER, 2003.

HELEN'S VIEW AND WALKER FARM ARE BOTH SERVED WITH ELECTRICITY AND WATER BY THE PUD, NATURAL GAS BY NW NATURAL GAS, CABLE BY COMCAST, FIRE PROTECTION BY FIRE DISTRICT 12, AND SEWER IS ABOUT 1,000 FEET TO THE SOUTH.

WALKER FARMS IS CURRENTLY ZONED AG-20. THE WALKER FAMILY DISCOVERED ABOUT FIVE YEARS AGO THAT THE FARM IS NOT LARGE ENOUGH TO PROVIDE EVEN ONE FAMILY WAGE JOB. IN FACT, BOTH JAMES WALKER AND HIS WIFE ARE HAVING TO HOLD DOWN OTHER JOBS OFF THE FARM IN ORDER TO SUPPORT THE FARM AND THEIR FAMILY.

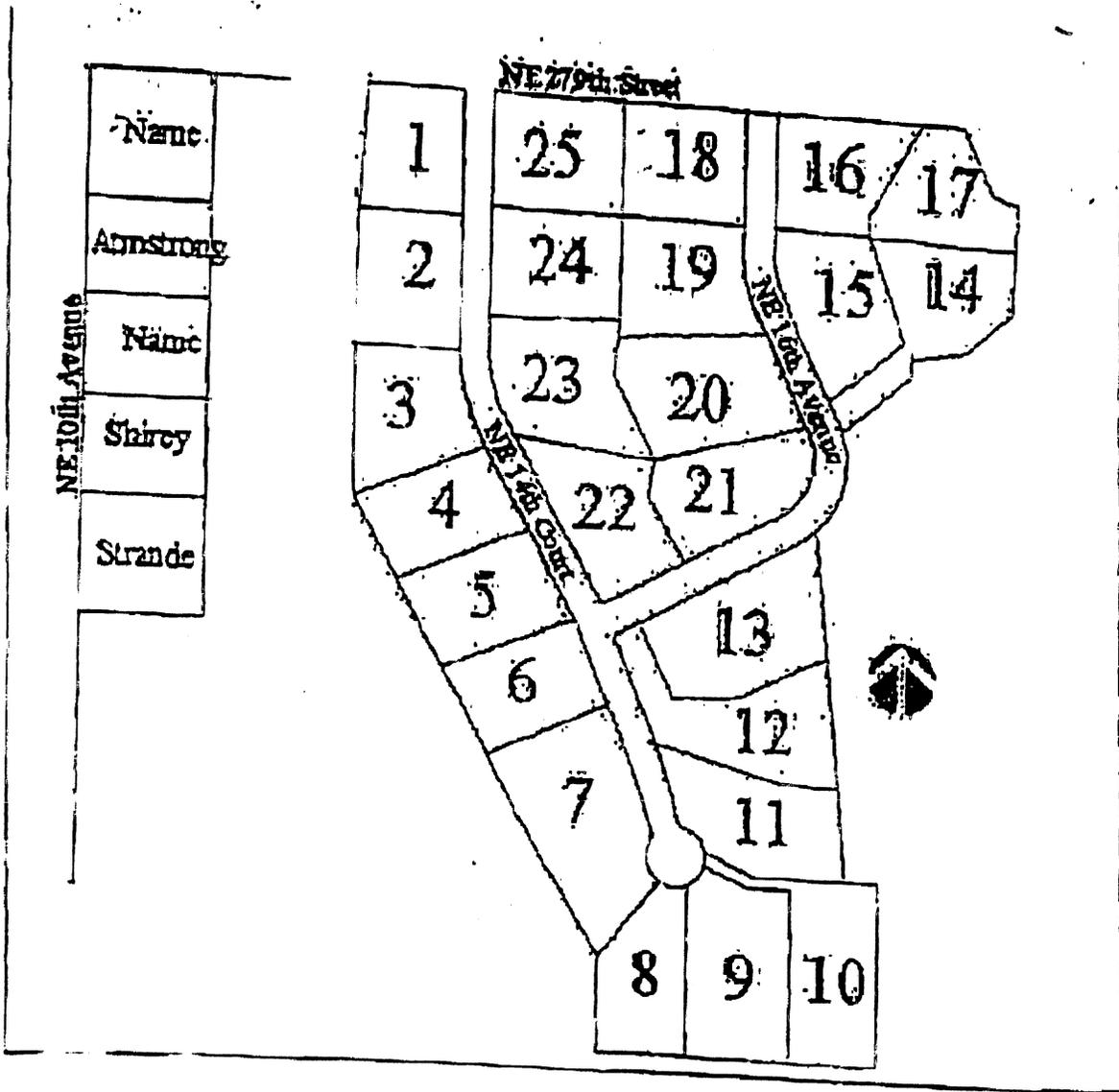
THE OWNERS OF WALKER FARM SUPPORT THE RIDGEFIELD PLANNING COMMISSION, AND RIDGEFIELD'S CITY COUNCIL IN THEIR DESIGNATION OF WALKER FARM TO BE LOCATED IN THE GROWTH MANAGEMENT AREA FOR RIDGEFIELD AS SHOWN ON YOUR ALTERNATIVE 2.

Very Respectfully,

Michael Langsdorf

MICHAEL G. LANGSDORF
Attorney at Law

Attachment F



Name	
Armstrong	
Name	
Shirey	
Strande	

NE 10th Avenue

NE 79th Street

NE 16th Avenue

NE 16th Court



COPY

TO: CLARK COUNTY PLANNING COMMISSION MEMBERS AND

RE: Expansion of Ridgefield Urban Growth Area East From I-5 to include the following properties located in the NW 1/4 of Section 23 T4NR1E4W1 and east of NE 10th Avenue:

Walker Farms LLC 2720 NE 10th Avenue, Ridgefield

Helen's View Phase 1 (residential plan located east of NE 10th Avenue and South of NE 279th Street and adjacent and north of Walker Farms, Ridgefield

We support the inclusion of above properties in the City of Ridgefield Urban Growth Area in accordance with the plan adopted by the City of Ridgefield on June 26, 2003 in a public hearing. These properties are marked P,8 on the map displayed on the overhead at the hearing before you on September 25, 2003.

Additionally, we support the designation of Urban Holding (UH-20c) for the Walker Farms property. The land has been divided to the point that the remaining farmland cannot support many full-time farmers. This new designation would be compatible with the existing residential uses and would retain large parcels for future industrial growth thus providing potential family-income jobs for our children as well as a good tax base for the City of Ridgefield.

	<u>NAME</u>	<u>ADDRESS</u>	<u>DATE</u>
#3	<i>Jeremy Allen</i>	27600 NE 14 th CT	10/1/03
#24	Chris Van Dongenstel X	27725 NE 14 th CT	10/1/07
3.
4.
5.
6.
7.
8.

TO: CLARK COUNTY PLANNING COMMISSION MEMBERS AND

RE: Expansion of Ridgefield Urban Growth Area East From I-5 to include the following properties located in the NW 1/4 of Section 23 T4N1E1W1 and east of NE 10th Avenue:

Walker Farms LLC 2720 NE 10th Avenue, Ridgefield

Helen's View Phase I (residential) plan located east of NE 10th Avenue and South of NE 279th Street and adjacent and north of Walker Farms, Ridgefield

We support the inclusion of above properties in the City of Ridgefield Urban Growth Area in accordance with the plan adopted by the City of Ridgefield on June 26, 2003 in a public hearing. These properties are marked P.8 on the map displayed on the overhead at the hearing before you on September 25, 2003.

Additionally, we support the designation of Urban Holding (UH-20%) for the Walker Farms property. The land has been divided to the point that the remaining farmland cannot support many full-time farmers. This new designation would be compatible with the existing residential uses and would retain large parcels for future industrial growth thus providing potential family-income jobs for our children as well as a good tax base for the City of Ridgefield.

	<u>NAME</u>	<u>ADDRESS</u>	<u>DATE</u>
	<i>Print your name below</i> <i>your signature</i>		
#4 1.	<i>Carl C. Futerma</i> CARL C. FUTERMA	27504 NE 14 th St.	10/1/03
2.	_____	_____	_____
3.	_____	_____	_____
4.	_____	_____	_____
5.	_____	_____	_____
6.	_____	_____	_____
7.	_____	_____	_____
8.	_____	_____	_____

TO: CLARK COUNTY PLANNING COMMISSION MEMBERS AND

RE: Expansion of Ridgefield Urban Growth Area East From I-5 to include the following properties located in the NW 1/4 of Section 23 T4NR1E4W1M and east of NE 10th Avenue:

Walker Farms LLC 27201 NE 10th Avenue, Ridgefield

Helen's View Phase 2 (residential plan located east of NE 10th Avenue and South of NE 279th Street and adjacent and north of Walker farms, Ridgefield

We support the inclusion of above properties in the City of Ridgefield Urban Growth Area in accordance with the plan adopted by the City of Ridgefield on June 26, 2003 in a public hearing. These properties are marked R8 on the map displayed on the overhead at the hearing before you on September 25, 2003.

Additionally, we support the designation of Urban Holding (UH-20's) for the Walker Farms property. The land has been divided to the point that the remaining farmland cannot support many full-time farmers. This new designation would be compatible with the existing residential uses and would retain large parcels for future industrial growth thus providing potential family-income jobs for our children as well as a good tax base for the City of Ridgefield.

	<u>NAME</u>	<u>ADDRESS</u>	<u>DATE</u>
	<i>Print your name below</i>		
	<i>your signature</i>		

#10

1. Grace Fenton 27407 NE 14th Court 10/1/03

2. Frank Fenton 27402 N.E. 14th Ct 10/1/03

#13

3. Dennis M. Wilson 27504 NE 16TH AVE 10/1/03
INDUSTRIAL, WA 98542

4. _____
5. _____
6. _____
7. _____
8. _____

l

TO: CLARK COUNTY PLANNING COMMISSION MEMBERS AND

RE: Expansion of Ridgfield Urban Growth Area East Front 1-5 to include the following properties located in the NW 1/4 of Section 23 T4NR1EWM and east of NE 10th Avenue:

Walker Farms LLC 27201 NE 10th Avenue, Ridgfield

Helen's View Phase I (residential) plan located east of NE 10th Avenue and South of NE 279th Street and adjacent and north of Walker Farms, Ridgfield

We support the inclusion of above properties in the City of Ridgfield Urban Growth Area in accordance with the plan adopted by the City of Ridgfield on June 26, 2003 in a public hearing. These properties are marked F.8 on the map displayed on the overhead at the hearing before you on September 25, 2003.

Additionally, we support the designation of Urban Holding (UH-200) for the Walker Farms property. The land has been divided to the point that the remaining farmland cannot support many full-time farmers. This new designation would be compatible with the existing residential uses and would retain large parcels for future industrial growth thus providing potential family-income jobs for our children as well as a good tax base for the City of Ridgfield.

NAME ADDRESS DATE

Print your name below
your signature

1. Bruce C Armstrong 27707 NE 10th Ave 10-1-03
Bruce C Armstrong Ridgfield, 98642

10th Ave #

- 2. _____
- 3. _____
- 4. _____
- 5. _____
- 6. _____
- 7. _____
- 8. _____

TO: CLARK COUNTY PLANNING COMMISSION MEMBERS AND

RE: Expansion of Ridgefield Urban Growth Area East From 1-5 to include the following properties located in the NW 1/4 of Section 23 T4N R1E W1M and east of NE 10th Avenue:

Walker Farms LLC 27201 NE 10th Avenue, Ridgefield

Helen's View Phase I (residential plan located east of NE 10th Avenue and South of NE 279th Street and adjacent and north of Walker Farms, Ridgefield

We support the inclusion of above properties in the City of Ridgefield Urban Growth Area in accordance with the plan adopted by the City of Ridgefield on June 26, 2003 in a public hearing. These properties are marked R.R on the map displayed on the overhead at the hearing before you on September 25, 2003.

Additionally, we support the designation of Urban Holding (U.H-2)(c) for the Walker Farms property. The land has been divided to the point that the remaining farmland cannot support many full-time farmers. This new designation would be compatible with the existing residential uses and would retain large parcels for future industrial growth thus providing potential family-income jobs for our children as well as a good tax base for the City of Ridgefield.

NAME ADDRESS DATE
Print your name below your signature

- # 11 1. Joni Sanches 27409 NE 14th Ct 10-1-03
Joni Sanches Ridgefield WA
- # 25 2. Jines Mc 27811 NE 14th Ct ~~RD~~ 10-1-03
Jines Mc FIELD
- # 25 3. Laura P. Helen 27811 NE 14th Ct Ridgefield 10-1-03
- 4. _____
- 5. _____
- 6. _____
- 7. _____
- 8. _____

TO: CLARK COUNTY PLANNING COMMISSION MEMBERS AND

RE: Expansion of Ridgefield Urban Growth Area East From 1-5 to include the following properties located in the NW 1/4 of Section 23 T4N R1E W1M and east of NE 10th Avenue:

Walker Farms LLC 27201 NE 10th Avenue, Ridgefield

Helen's View Phase I (residential) plan located east of NE 10th Avenue and South of NE 279th Street and adjacent and north of Walker Farms, Ridgefield

We support the inclusion of above properties in the City of Ridgefield Urban Growth Area in accordance with the plan adopted by the City of Ridgefield on June 26, 2003 in a public hearing. These properties are marked FR on the map displayed on the overhead at the hearing before you on September 25, 2003.

Additionally, we support the designation of Urban Holding (UH-2)(c) for the Walker Farms property. The land has been divided to the point that the remaining farmland cannot support many full-time farmers. This new designation would be compatible with the existing residential uses and would retain large parcels for future industrial growth thus providing potential family-income jobs for our children as well as a good tax base for the City of Ridgefield.

	<u>NAME</u>	<u>ADDRESS</u>	<u>DATE</u>
#14	<i>Print your name below</i> <i>your signature</i> 1. <u>Jonny Houser</u>	<u>27603 NE 16th Ave</u>	<u>10-1-03</u>
	2. <u>Alvin Houser</u>	<u>27603 NE 16th Ave</u>	<u>10/1/03</u>
	3. _____	_____	_____
	4. _____	_____	_____
	5. _____	_____	_____
	6. _____	_____	_____
	7. _____	_____	_____
	8. _____	_____	_____

02:51p
02:1134a

Jim & Karen Wilson 360-887-8429
Linda L. Johnson Returns (360) 250-6804

P.1
P.2

TO: CLARK COUNTY PLANNING COMMISSION MEMBERS AND

RE: Expansion of Ridgefield Urban Growth Area East From 1.5 to include the following properties located in the NW 1/4 of Section 21 T4N R1E W4 and east of NE 16th Avenue:

Walker Farms LLC 27201 NE 16th Avenue, Ridgefield

Helen's View Phases 1 and 2 - residential subdivision located east of NE 10th Avenue and South of NE 279th Street and adjacent and north of Walker Farms, Ridgefield

We support the inclusion of the above properties in the City of Ridgefield Urban Growth Area in accordance with the plan adopted by the City of Ridgefield on June 26, 2003 in a public hearing. These properties are marked R8 on the map displayed on the overhead at the hearing before you on September 25, 2003.

Additionally, we support the designation of Urban Holding (UH-20x) for the Walker Farms property. The land has been divided to the point that the remaining farmland cannot support many full-time farmers. This new designation would be compatible with the existing residential uses and would retain large parcels for future industrial growth thus providing potential family-income jobs for our children as well as a good tax base for the City of Ridgefield.

NAME	ADDRESS	DATE
<i>Print your name below</i> <i>your signature</i> 1. <u>Michael L. Collins</u>	21509 NE 16th Ave Ridgefield WA 98642	10/7/03
2. <u>L. Olds</u>	29413 NE 14th Ct. Ridgefield WA	10/7/03
3. <u>Michelle Adams</u> MICHELLE ADAMS	28600 NE 14th Ct, Ridgefield WA 98642	
4. <u>Heather Picard</u> Heather Picard	27503 NE 14th Ct Ridgefield WA 98642	
5. <u>James B. Harvey</u>		
6. <u>James B. Harvey</u>	27706 NE 14th Ct Ridgefield WA 98642	10/7/03
7. _____		

AGRICULTURAL OR FOREST ZONED PROPERTIES IN PREFERRED PLAN URBAN GROWTH BOUNDARY EXPANSION

AREA OF INTEREST	NUMBER OF PARCELS	RANGE OF PARCEL SIZES	MEDIAN PARCEL SIZE	TOTAL ACRES	ZONING	% CRITICAL LAND (50%+ BODILY)	ENVIRONMENTAL CONSIDERATIONS	% PRIME AG SOILS	% PRIME FOREST SOILS	% PAAW AND AG CAPABILITY USE	SEWER LINE WITHIN 500'
BA	3	16.4 - 38.04	25.83	76.90	AG-20	41.15%	Hydric soils, Riparian Habitat	26.15%	0.00%	74.63%	No
BI	26	0.85 - 42.94	6.87	342.40	AG-20	48.88%	Hydric soils, Riparian Habitat, Wetland	62.88%	14.74%	35.85%	Yes
CA-1	31	0.47 - 159.3	15.31	474.47	AG-20	61.78%	Hydric soils, Riparian and Non-riparian habitat, floodplain, Wetland	80.71%	11.48%	31.28%	No
CA-2	6	0.1 - 85.47	21.71	484.24	FR-40	82.63%	Steep slopes, Non-riparian habitat	26.98%	12.12%	0.00%	No
CB	17	0.2 - 80.98	27.66	432.19	AG-20	65.14%	Steep slopes, Wetlands, Riparian Habitat, Hydric soils	72.62%	13.20%	83.36%	No
CA	7	2.75 - 4.65	3.40	6.65	AG-20	13.58%	Steep slopes, Riparian Habitat	0.95%	0.00%	0.00%	Yes
LB-1	32	1.14 - 69.40	14.36	459.45	AG-20	66.66%	Hydric soils, Riparian and Non-riparian habitat, priority species, floodplain, Wetland, steep slopes	62.85%	31.37%	35.50%	No
LB-2	25	0.34 - 66.62	9.76	244.62	AG-20	60.16%	Hydric soils, Riparian Habitat, Wetland	60.47%	69.41%	12.20%	No
LC	6	1.6 - 16.22	7.73	49.17	AG-20	76.98%	Hydric soils, Riparian Habitat, Wetland	35.85%	35.85%	67.77%	No
RA	17	0.31 - 10.74	6.79	81.50	AG-20	47.19%	Hydric soils, Riparian Habitat, Wetland, Steep slopes	47.43%	47.43%	66.12%	No
RE-1	20	0.21 - 73.17	17.83	282.75	AG-20	35.48%	Hydric soils, Riparian Habitat, Wetland, Steep slopes	61.76%	35.04%	66.32%	No
RE-2	11	0.81 - 80.38	16.10	199.67	AG-20	65.68%	Hydric soils, Riparian and Non-riparian Habitat, Priority species, Wetland	58.70%	58.70%	85.69%	No
RC	54	0.89 - 104.80	9.07	309.07	AG-20	65.33%	Priority species buffer, Riparian habitat, Wetland, Hydric soils	70.88%	70.88%	68.86%	No
VA	4	11.04 - 72.02	21.25	126.02	AG-20	20.25%	Hydric soils, Riparian Habitat, Wetland	85.63%	86.60%	39.69%	No
VB	35	0.19 - 222.16	22.47	784.73	AG-20	68.41%	Hydric soils, Wetland, Priority species buffer	79.66%	43.68%	84.01%	No
VC	2	18.62 - 18.83	19.36	37.76	AG-20	43.11%	Hydric soils	61.00%	0.00%	51.10%	No
VE	14	0.65 - 63.81	5.62	416.64	AG-20	31.20%	Shoreline buffer, Riparian habitat, Hydric soils	78.49%	18.11%	61.42%	Yes
VA	30	0.54 - 70.23	6.14	240.65	AG-20	34.72%	Hydric soils, Riparian habitat, Wetland	57.61%	9.26%	65.74%	No
WB	7	37.41 - 78.65	69.03	116.06	AG-20	0.81%	Steep slopes, Riparian habitat	82.84%	82.84%	100.00%	No

Michael G. Langsdorf

ATTORNEY AT LAW
1915 WASHINGTON
VANCOUVER, WASHINGTON 98660

TELEPHONE: (360) 694-8121

Rec 9-20-06
RECEIVED SEP 20 2006
HEARINGS SUBMITTAL

TO BOARD OF COMMISSIONERS

WALKER FARMS IS OWNED BY JIM AND LAURIE WALKER AND DAVID CALLAHAM. IT IS A 103+ ACRE PARCEL, A PORTION OF WHICH FRONTS ON 10TH AVENUE AND A PORTION FRONTS ON 279TH. IT PRESENTLY IS USED FOR GROWING CORN AND RAISING PIGS.

A CLUSTER KNOWN AS HELEN'S VIEW IS LOCATED DIRECTLY TO THE NORTH OF THE PARCEL DESIGNATED AS WALKER FARMS. ATTACHED TO THIS PRESENTATION IS A COPY OF A PETITION SIGNED BY THE MAJORITY OWNERS OF HELEN'S VIEW AND SUBMITTED TO THE CLARK COUNTY PLANNING COMMISSION IN OCTOBER, 2003.

HELEN'S VIEW AND WALKER FARM ARE BOTH SERVED WITH ELECTRICITY AND WATER BY THE PUD, NATURAL GAS BY NW NATURAL GAS, CABLE BY COMCAST, FIRE PROTECTION BY FIRE DISTRICT 12, AND SEWER IS ABOUT 1,000 FEET TO THE SOUTH.

WALKER FARMS IS CURRENTLY ZONED AG-20. THE WALKER FAMILY DISCOVERED ABOUT FIVE YEARS AGO THAT THE FARM IS NOT LARGE ENOUGH TO PROVIDE EVEN ONE FAMILY WAGE JOB. IN FACT, BOTH JAMES WALKER AND HIS WIFE ARE HAVING TO HOLD DOWN OTHER JOBS OFF THE FARM IN ORDER TO SUPPORT THE FARM AND THEIR FAMILY.

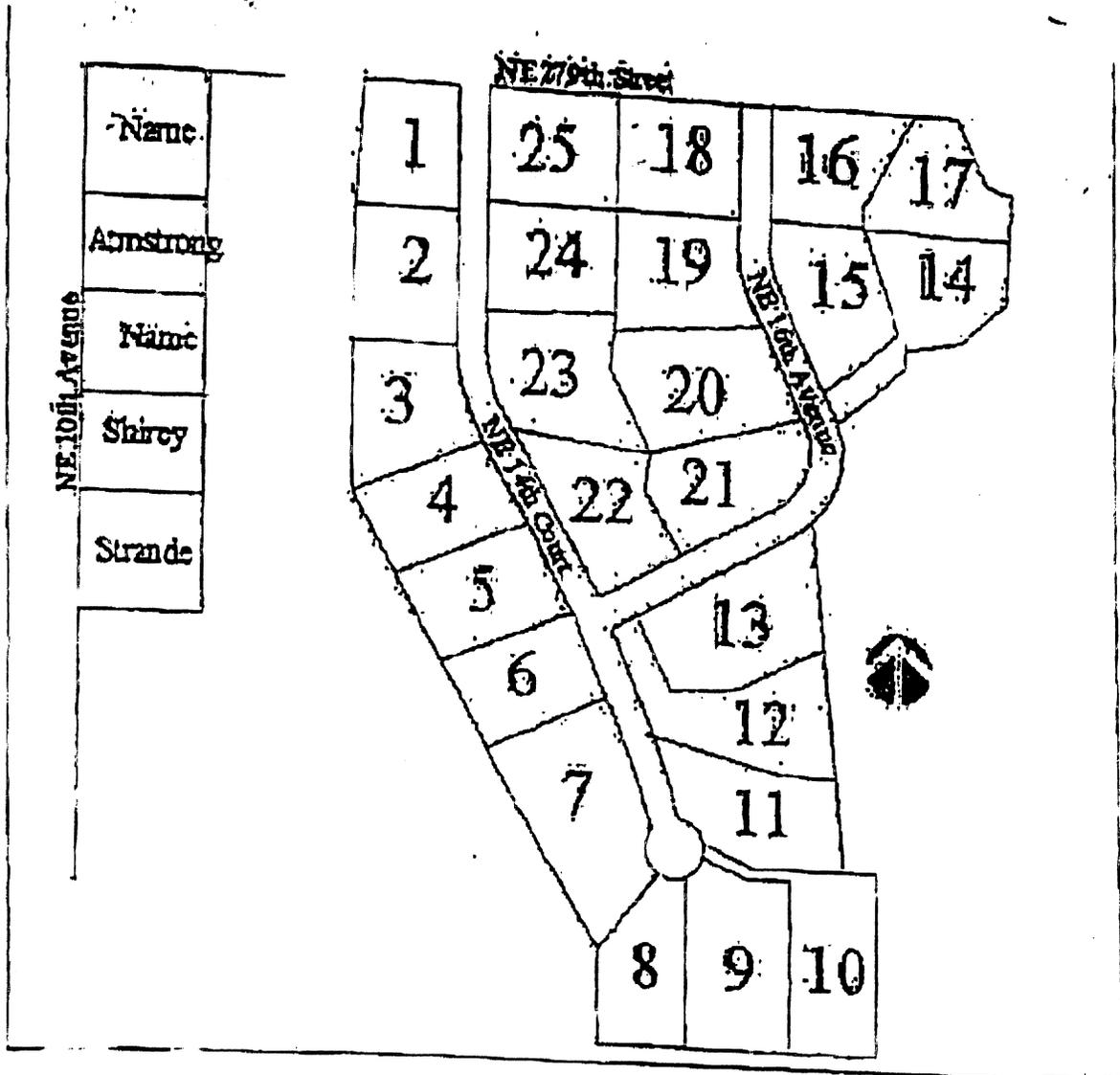
THE OWNERS OF WALKER FARM SUPPORT THE RIDGEFIELD PLANNING COMMISSION, AND RIDGEFIELD'S CITY COUNCIL IN THEIR DESIGNATION OF WALKER FARM TO BE LOCATED IN THE GROWTH MANAGEMENT AREA FOR RIDGEFIELD AS SHOWN ON YOUR ALTERNATIVE 2.

Very Respectfully,

Michael Langsdorf

MICHAEL G. LANGSDORF
Attorney at Law

Attachment F



Copy

TO: CLARK COUNTY PLANNING COMMISSION MEMBERS AND

RE: Expansion of Ridgefield Urban Growth Area East From I-5 to include the following properties located in the NW 1/4 of Section 23 T4NRI E4W1 and east of NE 16th Avenue:

Walker Farms LLC 2720 NE 16th Avenue, Ridgefield

Helen's View Phase 1 (residential plan located east of NE 10th Avenue and South of NE 279th Street and adjacent and north of Walker Farms, Ridgefield

We support the inclusion of above properties in the City of Ridgefield Urban Growth Area in accordance with the plan adopted by the City of Ridgefield on June 26, 2003 in a public hearing. These properties are marked P,8 on the map displayed on the overhead at the hearing before you on September 25, 2003.

Additionally, we support the designation of Urban Holding (UH-200) for the Walker Farms property. The land has been divided to the point that the remaining farmland cannot support many full-time farmers. This new designation would be compatible with the existing residential uses and would retain large parcels for future industrial growth thus providing potential family-income jobs for our children as well as a good tax base for the City of Ridgefield.

NAME

ADDRESS

DATE

Print your name below
your signature

#3
#24

1.	<u>Tommy Olsen</u>	<u>27600 NE 14th CT</u>	<u>10/1/03</u>
2.	<u>Chris Van Dongen</u>	<u>27705 NE 14th CT</u>	<u>10/1/07</u>

3. _____
4. _____
5. _____
6. _____
7. _____
8. _____

TO: CLARK COUNTY PLANNING COMMISSION MEMBERS AND

RE: Expansion of Ridgefield Urban Growth Area East From I-5 to include the following properties located in the NW 1/4 of Section 23 T4N1E1W1 and east of NE 10th Avenue:

Walker Farms LLC 27201 NE 10th Avenue, Ridgefield

Helen's View Phase 1 (residential) plan located east of NE 10th Avenue and South of NE 279th Street and adjacent and north of Walker Farms, Ridgefield

We support the inclusion of above properties in the City of Ridgefield Urban Growth Area in accordance with the plan adopted by the City of Ridgefield on June 24, 2003 in a public hearing. These properties are marked P8 on the map displayed on the overhead at the hearing before you on September 25, 2003.

Additionally, we support the designation of Urban Holding (UH-20r) for the Walker Farms property. The land has been divided to the point that the remaining farmland cannot support many full-time farmers. This new designation would be compatible with the existing residential uses and would retain large parcels for future industrial growth thus providing potential family-income jobs for our children as well as a good tax base for the City of Ridgefield.

	<u>NAME</u>	<u>ADDRESS</u>	<u>DATE</u>
	<i>Print your name below</i> <i>your signature</i>		
#4 1.	<i>Carl C. Fjell</i> CARL C. FJELL	27,504 NE 14 th St.	10/1/03
2.	_____	_____	_____
3.	_____	_____	_____
4.	_____	_____	_____
5.	_____	_____	_____
6.	_____	_____	_____
7.	_____	_____	_____
8.	_____	_____	_____

TO: CLARK COUNTY PLANNING COMMISSION MEMBERS AND

RE: Expansion of Ridgefield Urban Growth Area East Front 1-5 to include the following properties located in the NW ¼ of Section 23 T4N R1E W1M and east of NE 10th Avenue:

Walker Farms LLC 27201 NE 10th Avenue, Ridgefield

Helen's View Phase I (residential) plan located east of NE 10th Avenue and South of NE 279th Street and adjacent and north of Walker Farms, Ridgefield

We support the inclusion of above properties in the City of Ridgefield Urban Growth Area in accordance with the plan adopted by the City of Ridgefield on June 26, 2003 in a public hearing. These properties are marked F8 on the map displayed on the overhead at the hearing before you on September 25, 2003.

Additionally, we support the designation of Urban Holding (UH-20r) for the Walker Farms property. The land has been divided in the past that the remaining farmland cannot support many full-time farmers. This new designation would be compatible with the existing residential uses and would retain large parcels for future industrial growth thus providing potential family-income jobs for our children as well as a good tax base for the City of Ridgefield.

	<u>NAME</u>	<u>ADDRESS</u>	<u>DATE</u>
1.	<i>Bruce C Armstrong</i>	27707 NE 10 th Ave Ridgefield, 98642	10-1-03
2.	_____	_____	_____
3.	_____	_____	_____
4.	_____	_____	_____
5.	_____	_____	_____
6.	_____	_____	_____
7.	_____	_____	_____
8.	_____	_____	_____

10th Ave #

TO: CLARK COUNTY PLANNING COMMISSION MEMBERS AND

RE: Expansion of Ridgefield Urban Growth Area East From I-5 to include the following properties located in the NW 1/4 of Section 23 T4N R1E W M and east of NE 10th Avenue:

Walker Farms LLC 27201 NE 10th Avenue, Ridgefield

Helen's View Phase I (residential plan located east of NE 10th Avenue and South of NE 279th Street and adjacent and north of Walker Farms, Ridgefield

We support the inclusion of above properties in the City of Ridgefield Urban Growth Area in accordance with the plan adopted by the City of Ridgefield on June 26, 2003 in a public hearing. These properties are marked R8 on the map displayed on the overhead at the hearing before you on September 25, 2003.

Additionally, we support the designation of Urban Holding (UH-20r) for the Walker Farms property. The land has been divided to the point that the remaining farmland cannot support many full-time farmers. This new designation would be compatible with the existing residential uses and would retain large parcels for future industrial growth thus providing potential family-income jobs for our children as well as a good tax base for the City of Ridgefield.

	<u>NAME</u>	<u>ADDRESS</u>	<u>DATE</u>
	<i>Print your name below</i>		
	<i>your signature</i>		
# 11	Joni Sanch Jose Sanches	27409 NE 14th Ct Ridgefield WA	10-1-03
# 25	Jines M...	27811 NE 14th Ct FIELD	10-1-03
# 25	Laura P. Helmi	27811 NE 14th Ct Ridgefield	10-1-03
4.
5.
6.
7.
8.

TO: CLARK COUNTY PLANNING COMMISSION MEMBERS AND

RE: Expansion of Ridgefield Urban Growth Area East From 1-5 to include the following properties located in the NW 1/4 of Section 23 T4NR1EVM and east of NE 10th Avenue:

Walker Farms LLC 27201 NE 10th Avenue, Ridgefield

Helen's View Phase I (residential) plan located east of NE 10th Avenue and South of NE 279th Street and adjacent and north of Walker Farms, Ridgefield

We support the inclusion of above properties in the City of Ridgefield Urban Growth Area in accordance with the plan adopted by the City of Ridgefield on June 26, 2003 in a public hearing. These properties are marked FR on the map displayed on the overhead at the hearing before you on September 25, 2003.

Additionally, we support the designation of Urban Holding (UH-2)(c) for the Walker Farms property. The land has been divided to the point that the remaining farmland cannot support many full-time farmers. This new designation would be compatible with the existing residential uses and would retain large parcels for future industrial growth thus providing potential family-income jobs for our children as well as a good tax base for the City of Ridgefield.

	<u>NAME</u>	<u>ADDRESS</u>	<u>DATE</u>
#14	<i>Print your name below</i> <i>your signature</i> 1. <u>Janice Houser</u>	<u>27603 NE 16th Ave</u>	<u>10-1-03</u>
	2. <u>Abel Houser</u>	<u>27603 NE 16th Ave</u>	<u>10/1/03</u>
	3. _____	_____	_____
	4. _____	_____	_____
	5. _____	_____	_____
	6. _____	_____	_____
	7. _____	_____	_____
	8. _____	_____	_____

TO: CLARK COUNTY PLANNING COMMISSION MEMBERS AND

RE: Expansion of Ridgefield Urban Growth Area East From 1-5 to include the following properties located in the NW 1/4 of Section 21 T4NR1EW and east of NE 16th Avenue:

Walker Farms LLC 27201 NE 16th Avenue, Ridgefield

Helen's View Phases 1 and 2 - residential subdivision located east of NE 10th Avenue and South of NE 279th Street and adjacent and north of Walker Farms, Ridgefield

We support the inclusion of the above properties in the City of Ridgefield Urban Growth Area in accordance with the plan adopted by the City of Ridgefield on June 26, 2003 in a public hearing. These properties are marked R8 on the map displayed on the overhead at the hearing before you on September 25, 2003.

Additionally, we support the designation of Urban Holding (UH-20x) for the Walker Farms property. The land has been divided in the point that the remaining farmland cannot support many full-time farmers. This new designation would be compatible with the existing residential uses and would retain large parcels for future industrial growth thus providing potential family-income jobs for our children as well as a good tax base for the City of Ridgefield.

NAME	ADDRESS	DATE
<i>Print your name below your signature</i>		
1. <i>[Signature]</i> Michael L. Collins	27509 NE 16th Ave Ridgefield WA 98642	10/7/03
2. L. Olds	29413 NE 14th Ct. Ridgefield WA	10/7/03
3. <i>[Signature]</i> MICHELLE ALONSO	28600 NE 14th Ct. Ridgefield WA 98642	
4. <i>[Signature]</i> Heather Picard	27503 NE 14th Ct Ridgefield WA 98642	
5. <i>[Signature]</i>		
6. <i>[Signature]</i> James B. Harvey	27706 NE 14th Ct Ridgefield WA 98642	10/7/03
7. _____		

APPENDIX 4

Exhibit 6512

6512
9/25/07

ORDINANCE NO. 2007-09-13

An ordinance relating to land use; adopting an updated Growth Management Comprehensive Land Use Plan, zoning maps and zoning ordinances; providing for severability; providing an effective date; and requiring notice.

WHEREAS, Clark County is required to update its comprehensive plan in accordance with the goals and requirements of RCW 36.70A (the Growth Management Act, or GMA); and

WHEREAS, the county's comprehensive plan is required to include maps and descriptive text covering the objectives, principles and standards used to develop the essential elements of the plan; and

WHEREAS, GMA directs counties to adopt urban-growth areas (areas within which urban growth is encouraged and outside of which only non-urban growth can occur) and to address these areas in the county-wide planning policies; and

WHEREAS, GMA mandates the county's identification and designation of critical areas and agricultural, forest, and mineral resources lands, together with the adoption of protective regulations; and

WHEREAS, the update of the county's comprehensive plan must be processed in compliance with the State Environmental Policy Act (SEPA), and include an analysis of cumulative effects of development in the county; and

WHEREAS, the county needs to address site-specific requests for comprehensive plan and zoning changes, and considered requests on more than 300 parcels; and

WHEREAS, 1) the county, pursuant to RCW 36.70A.130 revised UGAs to accommodate a new 20-year OFM population projection in 2004; (2) the board

determined that the public interest requires adjustment of the growth assumption in the 2004 plan from 1.67% annually to 2.0% annually; (3) the plan horizon has remained the same and the increased growth assumption continues to fall within the OFM range, and (4) the plan reflects principles and values adopted by the board at the outset of the update process; and

WHEREAS, copies of the county's proposed updated comprehensive plan are required to be and have been submitted to the state at least sixty days prior to final adoption, and the plan must be transmitted to the state within ten days after final adoption; and

WHEREAS, it is expected that the cities will complete the updates to their land use and capital facilities plans to make them consistent with the county plan; now therefore

BE IT ORDERED AND RESOLVED BY THE BOARD OF COUNTY

COMMISSIONERS OF CLARK COUNTY, STATE OF WASHINGTON, as follows:

I. FINDINGS

A. Findings, General

The Board of County Commissioners (the Board) finds that all GMA prerequisites for the revision of the county's comprehensive plan have been met and that the plan adopted herein achieves the goals and satisfies the requirements of the GMA, as follows:

1. Compliance with the Required Elements of the Comprehensive Plan. The 20-year Comprehensive Growth Management Plan adopted herein includes all of the following required elements: Land Use, Housing, Capital Facilities and Utilities, Rural and Natural Resources, Transportation, Economic Development, and Parks and Open Space. In addition, the plan also contains the following optional elements: Environment, Historic Preservation, Schools, Community Design, Annexation, and Procedural Guidelines.
2. Compliance with Resource and Critical Areas Designations and Regulation. Resource issues were not addressed in this plan revision; findings related to inclusion

of resource lands in UGAs are included in Section B below. Agricultural, forest and mineral resource lands are designated on the Comprehensive Plan map, and conserved through the establishment of minimum lot sizes and other zoning regulations.

3. Public Participation. The public participation requirements of the GMA have been met through an extensive public involvement process that included the following:
 - a. A Technical Advisory Committee comprised of planners from the cities, the county and special districts, who met to discuss planning issues of a technical nature.
 - b. Two county-wide mailings describing the GMA plan update process and progress made, and asking for comments on a variety of growth management issues.
 - c. Three rounds of public meetings (February 2006; September 2006; May 2007) throughout Clark County on the environmental impact statement/capital facilities plan process, the land use alternatives, and the proposed plan.
 - d. Extensive use of the Clark County website that included information on the GMA, an outline of the comprehensive plan update process, notices of meetings and hearings, maps of alternatives considered in the EIS process, meeting summaries, and issue discussions, the DEIS, and the FEIS, and a way to comment to the county directly about GMA issues.
 - e. Ads, flyers, postcards, meeting summaries, etc. sent to a GMA e-mailing list of 780.
 - f. Outreach to special audiences, including neighborhoods and youth; community groups; and staffing of a booth for the ten-day run of the 2006 Clark County Fair.
 - g. Televised public hearings held by the Planning Commission and the Board on plan adoption.

4. State Environmental Policy Act (SEPA). The county has complied with the environmental review process required by SEPA, as follows:
 - a. A scoping meeting was held in October 2005.
 - b. A Draft Environmental Impact Statement (DEIS) outlining three alternatives was completed in August 2006. Open houses to review EIS information and to prepare citizens to comment were held in September 2006. A public hearing on the DEIS was held on September 20, 2006.
 - c. A Final EIS was completed in May 2007. The FEIS focused on a preferred alternative, which subsequently became the proposal that was the subject of public hearings before the Planning Commission and the Board.
 - d. The FEIS was a major decision tool in the comprehensive plan update process.

5. Amendment. The Comprehensive Plan provides adequate monitoring and amendment procedures.
 - a. The Comprehensive Plan provides for a procedure to monitor internal and inter-jurisdictional consistency.
 - b. The Comprehensive Plan contains provisions governing its amendment. Amendments will not be considered more than once each year.

- c. The Comprehensive Plan provides for an automatic comprehensive review of urban growth areas at least once every ten years.
6. Record of Process.
 - a. The Board and the Clark County Planning Commission conducted a duly-advertised joint public hearing on the comprehensive plan update on June 5, 6, and 7, 2007.
 - b. The Clark County Planning Commission conducted a duly-advertised public hearing concerning recommendations for adoption of the Comprehensive Plan on June 7, 11, 12, and 13, 2007. A public hearing on annual reviews and dockets was held on May 17, 2007.
 - c. The Board conducted a duly-advertised public hearing concerning the Planning Commission recommendation and adoption of the Comprehensive Plan on June 19, 20, 26, 28 and 29; July 5; August 14 and 28; and September 11, 18 and 25, 2007.
 - d. All public hearings before the Planning Commission and the Board included opportunities for public comment.
 - e. All public hearings before the Planning Commission and the Board were transcribed, tape recorded, and televised locally on cable television. Written transcripts, and video and audio tapes are on file.
 - f. Copies of all newsletters, articles, and other publications are on file.
 - g. Copies of all written correspondence received by the county are on file.
 7. Internal Consistency. The Comprehensive Plan is internally consistent.
 - a. The policies within and among elements are complementary, not contradictory. Both separately and together, they further the goals of the GMA.
 - b. The land use map represents a detailed analysis carried out in cooperation with individual cities and the business and environmental communities. The analysis and draft land use maps were subject to public scrutiny for several months as the analysis progressed.
 - c. The Comprehensive Plan contains policies, implementation measures, and procedures which provide for its review and adjustment if internal conflicts are discovered.
 8. Individual Site Specific Requests. Clark County established a process to address individual site specific requests for a change in designation and/or zoning as part of the plan update.
 9. Concurrency. The Comprehensive Plan meets the concurrency requirement of the GMA. The plan requires direct concurrency for transportation (implemented by the concurrency ordinance which specifies levels of service for identified corridors) for water and for sewer, and the plan includes six and twenty-year project lists for these. The plan also includes project lists for indirect concurrency elements (schools, parks and stormwater).

10. Inter-jurisdictional Coordination. The Comprehensive Plan is consistent with adopted county-wide planning policies. The Community Framework Plan introduces the element chapters of the plan. County-wide planning policies are included in each plan element.
11. Coordination with other plans. The Comprehensive Plan is coordinated with those of neighboring jurisdictions. Environmental documents were developed jointly by the county and the cities within it. Capital facilities plans were produced in cooperation with cities, C-Tran, service providers, public safety agencies, school districts, and metropolitan area planning agencies. Park, recreation and open space planning has been carried out cooperatively with cities and Vancouver-Clark Parks.
12. Analysis of Cumulative Effects. An analysis of cumulative effects has been completed as part of the review of the comprehensive plan under SEPA. The SEPA was done jointly for the comprehensive plans of the county and its cities. Affected jurisdictions and the public have had an opportunity to comment on this analysis.
13. GMA Goals. The Comprehensive Plan addresses the goals of the GMA through its policies and implementation measures. The GMA contains 13 goals listed as follows, with corresponding policies of the plan noted. The plan is also in compliance with more specific citations contained within the GMA. Plan goals and policies which achieve compliance with the GMA in its entirety are also not limited to those cited below in association with the 13 basic goals.

- a. Urban Growth: Encourage development in urban areas where adequate public facilities exist or can be provided in an efficient manner.

The Community Framework Plan contains policies that direct growth within the region into existing urban areas. The plan addresses this objective most directly through the goals and policies in the Land Use Element, as well as the adoption of new urban growth boundaries surrounding local cities. Supporting policies and implementation measures are contained throughout the document.

- b. Reduce Sprawl: Reduce the inappropriate conversion of undeveloped land into sprawling, low-density development.

The plan addresses this objective directly through the goals and policies in the Land Use Element, as well as the adoption of new urban growth boundaries surrounding local cities.

- c. Transportation: Encourage efficient multi-modal transportation systems that are based on regional priorities and coordinated with county and city comprehensive plans.

The Comprehensive Plan addresses this most directly through the goals and policies in the Transportation Element.

- d. Housing: Encourage the availability of affordable housing to all economic segments of the population, promote a variety of residential densities and housing types, and encourage preservation of the existing housing stock.

The Comprehensive Plan addresses this most directly through the goals and policies in the Housing Element, as well as the variety of residential designations contained in the Comprehensive Plan map.

- e. Economic Development: Encourage economic development throughout the state that is consistent with adopted comprehensive plans, promote economic opportunity for all citizens of the state, especially for unemployed and for disadvantaged persons, and encourage growth in areas experiencing insufficient economic growth, all within the capacities of the state's natural resources, public services and public facilities.

The Comprehensive Plan addresses this most directly through the goals and policies in the Economic Development Element, and through the designation of industrial and commercial lands on the Comprehensive Plan map.

- f. Property Rights: Private property shall not be taken for public use without just compensation having been made. The property rights of landowners shall be protected from arbitrary and discriminatory actions.

It is the intent of Clark County in administering the Comprehensive Plan to ensure that regulatory actions affecting private property are not arbitrary or discriminatory in any way. The rights of private property owners and the avoidance of any taking of private property without just compensation have been given due consideration in the development of the Comprehensive Plan policies and implementation measures.

- g. Permits: Applications for both state and local permits should be processed in a timely and fair manner to ensure predictability.

The Comprehensive Plan addresses this most directly through the goals and policies in the Housing Element, Rural and Resource Element and the Economic Development Element, and through ordinance language that outlines specific standardized processes for permit issuance.

- h. Natural Resource Industries: Maintain and enhance natural resource-based industries, including productive timber, agricultural and fisheries industries. Encourage the conservation of productive forest lands and productive agricultural lands, and discourage incompatible uses.

The Comprehensive Plan addresses this most directly through the goals and policies in the Rural and Resource Element and the Economic Development

Element, and through specific identification and designation of agricultural, forest, and mineral resource lands.

- i. Open Space and Recreation: Encourage the retention of open space and development of recreational opportunities, conserve fish and wildlife habitat, increase access to natural resource lands and water, and develop parks.

The Comprehensive Plan addresses this most directly through the goals and policies in the Environmental Element and the Parks, Recreation, and Open Space Element.

- j. Environment: Protect the Environment and enhance the state's high quality of life including air and water quality and availability of water.

The Comprehensive Plan addresses this most directly through the goals and policies in the Environmental Element and the Parks, Recreation, and Open Space Element, and related ordinances relating to protection of critical areas and shorelines.

- k. Citizen Participation and Coordination: Encourage the involvement of citizens in the planning process and ensure coordination between communities and jurisdictions to reconcile conflicts.

Throughout the plan update process Clark County has provided extensive opportunities for citizen involvement and coordination, ranging from community-wide open houses to surveys to formal hearing testimony. The Community Involvement Process is detailed in the Introduction to the Comprehensive Plan, and within this ordinance.

- l. Public Facilities and Services: Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally-established minimum standards.

The Comprehensive Plan addresses this most directly through the goals and policies in the Capital Facilities and Utilities Element and the Schools Element, and the county's transportation concurrency ordinance.

- m. Historic Preservation: Identify and encourage the preservation of lands, sites, and structures that have historical or archaeological significance.

The Comprehensive Plan addresses this most directly through the goals and policies in the Historic, Archaeological and Cultural Preservation Element.

14. Compliance with county-wide planning policies. As required by the GMA, Clark County participated in discussions with cities within the county to revise urban

growth area boundaries, and adopted such boundaries for each city consistent with the county-wide planning policies. Further, the county provided notification to surrounding jurisdictions of its comprehensive plan development process. The county has achieved consistency with adopted county-wide planning policies.

15. Compliance with submission requirements. The required notice of intent to adopt was filed with the Washington Department of Community, Trade, and Economic Development (CTED) within the required time frame.
 - a. CTED received notice of the county's intent to adopt a comprehensive plan under the GMA on May 23, 2007.
 - b. Comments were received from CTED on the DEIS on October 12, 2006, and on the FEIS in a letter dated June 4, 2007. CTED's comments were considered in the update of the Comprehensive Plan.
16. Implementation measures. The county has adequate development regulations through Title 40 in place. Adoption of updates to zoning ordinances and other measures necessary to implement the Comprehensive Plan are being adopted simultaneously with this ordinance.

B. Findings, Contested Issues

17. SEPA issues

The Board finds that the EIS satisfies the rule of reason, specifically:

- Alternatives.
 1. The EIS contains a 'no-action' alternative that is within the definition in the SEPA rules.
 2. The EIS contains a discussion of a 'delay alternative' by making reference to phasing development as a way to mitigate the impacts of the proposal.
 3. The EIS includes a reasonable range of alternatives, which, according to the WAC 1) are required to be sufficient to do a comparative impact evaluation, and 2) shall be limited to a general discussion of impacts of alternative proposals for policies, for land use, and for implementation measures.
- The FEIS may respond to comments by incorporating a revised DEIS.
- The EIS contains an adequate analysis of cumulative impacts since the impacts described are those that would occur at build-out at the end of the 20-year planning horizon. A comprehensive plan EIS deals with land use over the landscape and not with specific projects.
- The EIS contains adequate information to assist decision makers in their discussions about where and where not to expand urban growth boundaries to accommodate the projected growth.

- The EIS contains a discussion about how current plans are consistent with the proposal.
- The EIS contains a discussion of the preliminary cost figures for implementing the proposal that has been substantially fleshed-out in the proposed Capital Facilities Plan and Capital Facilities Financial Plan that are adopted as part of the comprehensive plan by this ordinance.
- Capital facilities projects for transportation are similar for each alternative in the FEIS because the same road segments under county jurisdiction would need capacity improvements under either alternative.
- The EIS contains an adequate discussion of the impacts of adding 6,300 acres of impervious surface in UGAs over the next 20 years.

Based on the foregoing, the Board rejects the appeals challenging the adequacy of the FEIS.

18. Agricultural lands

The Board finds de-designating of lands designated as 'Agriculture' and their inclusion in urban growth areas to be appropriate, as follows:

- Battle Ground UGA. About 414 acres are de-designated and included in the UGA primarily because 1) of proximity to urban areas; 2) the lack of commercial agricultural production; and 3) the presence of environmental constraints.
- Camas UGA. About 745 acres are de-designated and included in the UGA primarily because of 1) proximity to urban areas; 2) the possibility of more intensive use; and 3) unique economic development activities. In addition, 69 acres of land is de-designated from 'Forest' and included in the UGA because of the lack of long-term commercial significance.
- La Center UGA. About 652 acres are de-designated and included in the UGA primarily because of 1) the presence of urban growth; 2) the possibility of more intensive use; and 3) the need to diversify the La Center economy.
- Ridgefield UGA. About 788 acres are de-designated and included in the UGA primarily because of 1) the presence of urban growth and proximity to urban areas (the so-called 'doughnut hole), and 2) the possibility of more intensive use.
- Vancouver UGA. About 1,383 acres are de-designated and included in the UGA primarily because of 1) the presence of urban growth and proximity to urban areas; 2) the possibility of more intensive use; and 3) the need to create jobs with

a new industrial node to include and served by the county railroad which will diversify the economic base in the Battle Ground School District.

- Washougal UGA. About 370 acres are de-designated and included in the UGA because of the lack of long-term commercial significance.

19. Overrides

The Board asked each of the cities for a list of overrides to reflect 1) jobs on sites for which development approvals have been granted, and 2) where transportation/planning studies or development agreements indicate that the density is likely to be different from that assumed in the VBLM density calculations. The overrides the Board accepted are shown in Table 20 in the FEIS, and they were included in the calculations of how much land would be needed to accommodate projected growth.

Additional Vancouver overrides have been recognized in the adopted plan. Even though the city and county continue to disagree over certain overrides related to densities due to city/county sub-area plans and recent development patterns, the conflict between respective plan assumptions does not amount to GMA violation so long as neither plan precludes realization of the other. The adopted plan commits the county to coordinating with the city in monitoring and adjusting VBLM assumptions.

20. Fish and Wildlife

With regard to fish and wildlife in the county, the Board, in response to comments from the Washington Department of Fish and Wildlife (WDFW), finds the following:

- The county's habitat conservation ordinance (HCO) provides for connectivity by establishing riparian habitat areas along the length of streams, which along with identified PHS sites, protects against fragmentation. The HCO also allows the county to manage access to habitat areas.
- The comprehensive plan keeps open space between UGAs.
- The county's efforts with regard to open space and wildlife corridors has been the protection of more than 3,800 acres of high-quality shorelines, greenways, open space, and fish and wildlife habitat. The Conservation Futures program is central to this effort. The county is also looking into mitigation banking for both wetlands and habitat, and is considering a 'transfer of development rights' program.
- The city of Camas responded to WDFW in a letter dated June 27, 2007. The city included Camp Currie and the park land the south end of the Lacamas Lake north shore in order to protect these areas from urban development. The city has critical areas ordinances in place by which any development would be reviewed. And, the city has a proposed Open Space Network map

that includes a continuous open space along the north shore of the lake northwest to include Lacamas Creek.

- The Preferred Alternative for La Center included the Eaglecrest subdivision north of La Center Road and all of the Lewis River bottomlands north and east of the subdivision. The August 14, 2007 Land Use Map excludes all of this area from the proposed La Center UGA expansion, leaving it in county jurisdiction.

21. Capital Facilities Plans

With regard to capital facilities, the Board finds the following:

- Capital facilities plans for service providers (including school districts, public safety, parks, water, sewer, and transportation) satisfy GMA requirements are incorporated into the comprehensive plan.
- The city of Ridgefield has adequately addressed its sewer capacity issue.

II. COMPREHENSIVE PLAN ADOPTION

Section 1. Adoption of the updated Clark County Comprehensive Plan. The 20-year land use plan is hereby adopted as the GMA Comprehensive Plan for Clark County. The plan consists of the following documents:

1. The 20-year Comprehensive Growth Management Plan document and all text and policies contained therein (Exhibit 1).
2. Updated maps showing plan designations for unincorporated rural and resource lands, and maps establishing urban growth area boundaries and providing plan designations for unincorporated lands within the boundaries of cities and towns in Clark County (Exhibits 2A and 2B). Such updates reflect the dockets process.
3. An updated map showing arterial classifications and cross-sections for roadways within the county's land-use jurisdiction (Exhibit 3).
4. The following items, incorporated by reference:
 - a. Capital facilities plans for school districts; transportation; parks, recreation and open space services; water; sewer; sheriff; fire; and stormwater;
 - b. Clark County Capital Facilities Financial Plan
 - c. 2007-12;
 - d. Vacant and Buildable Lands Analyses for urban growth areas; and
 - e. County transportation analysis.

Section 2. Adoption of the updated Clark County Zoning Map. An updated zoning map is hereby adopted that implements the GMA Comprehensive Plan for Clark County. (Exhibit 4)

Section 3. Amendatory. Clark County Code Section 40.100.070 Definitions is amended as shown in Exhibit 5.

Section 4. Amendatory. Clark County Code Section 40.230.070 Urban Holding Districts is amended as shown in Exhibit 6.

Section 5. Repealer. Clark County Code Chapter 40.250.050 Interchange Area Overlay District is repealed.

Section 6. Amendatory. Clark County Code Chapter 40.350 Transportation and Circulation is amended as shown in Exhibit 7.

Section 7. Amendatory. Clark County Code Section 40.560.010 Plan Amendment Process is amended as shown in Exhibit 8.

III. DOCKETS/ANNUAL REVIEWS

Section 8. Dockets/Annual Reviews. The findings and analysis contained in the Clark County Planning Commission's memorandum dated May 17, 2007, relating to the 2007 Comprehensive Plan Amendments—Dockets is hereby adopted and incorporated herein by reference, except inconsistent with the following:

Comprehensive Land Use Plan and Zoning Map Modifications

1. The Clark County 20-Year Comprehensive Growth Management Plan Map Designation and corresponding Zoning Map for that certain property located at the corner of NE 29th Avenue and NE 139th Street is hereby amended from Neighborhood Commercial (C-2) to Employment Center (OC) respectively as recommended by the Planning Commission and as indicated on the attached map (Exhibit 9). In the matter of **Docket item number CPZ2007-00003 HCR Manor Care**, the Board concluded that the Employment Center designation is appropriate for the site due to its location near similarly designated parcels and its proximity to medical facilities. Tax serial numbers 186633-000, 186633-005, 186633-010, 186648-000, located in the NE Quarter Section 26, Township 3 North, Range 1 East of the Willamette Meridian.
2. The Clark County 20-Year Comprehensive Growth Management Plan Map Designation and corresponding Zoning Map for that certain property located at the intersection of NE Fourth Plain Boulevard and 162nd Avenue is hereby amended to remove the surface mining overlay as recommended by the Planning Commission and as indicated on the attached map (Exhibit 10). In the matter of **Docket item number CPZ2007-00004 Eastlake Village**, after reviewing supplemental information provided by County staff, the Board concluded the surface mining overlay was no longer appropriate in the vicinity of the site and should be removed. Tax serial numbers:

107963472, 107963474, 107963476, 107963478, 107963480, 107963482, 107963484, 107963486, 107963488, 107963502, 107963504, 107963506, 107963508, 107963510, 107963512, 107963514, 107963516, 107963518, 107963520, 107963522, 107963524, 107963526, 107963528, 107963530, 107963538, 107963546, 107963548, 107963550, 107963560, 107963562, 107963564, 107963578, 107963580, 107963582, 107963602, 107963606, 107963608, 107963610, 107963612, 107963614, 107963616, 107963618, 107963620, 107963622, and 107963624 located in the NW ¼ Section 12, Township 2 North, Range 2 East of the Willamette Meridian.

3. The Clark County 20-Year Comprehensive Growth Management Plan Map Designation and corresponding Zoning Map for that certain property located at 9600 NE 179th Street, is hereby amended from Rural Residential (R-5) to Rural Center Residential (RC-1) respectively as indicated on the attached map (Exhibit 11). In the matter of **Docket item number CPZ2007-00005 Meadow Glade**, the Board concluded that higher density residential designation is suitable for parcel 193854-000 (9600 NE 179th Street) because the density of surrounding development is similar to the proposed density and the parcel is not in the City of Battle Ground's Urban Growth Boundary. Tax serial number 193854-000, located in the NW ¼ Section 09, Township 3 North, Range 2 East of the Willamette Meridian. In a separate motion, the board denied the proposed RC-1 zoning for Parcels 193928-000, 193932-000, 193927-000, 193936-000, 193923-000, 193931-000, 193940-000, and 193941-000, due to the fact that these parcels are now within the City of Battle Ground's Urban Growth Boundary.
4. The Clark County 20-Year Comprehensive Growth Management Plan Map Designation and corresponding Zoning Map for certain property located in the vicinity of NE 88th Street, west of the I-205 Interchange, is hereby amended from Light Industrial (ML) to General Commercial (CH), and for certain property located south of NE 88th Street, east of the I-205 Interchange, is hereby amended from Light Industrial (ML) to Low Density Residential (R1-6), as recommend by the Planning Commission and as indicated on the attached map (Exhibit 12). In the matter of **Annual Review item number CPZ2007-00006 SW Barberton Commercial Area**, the Board concluded that the general commercial designation is more appropriate for a designated area west of the I-205 Interchange in recognition of the type and intensity of commercial uses which would be suitable in this location. The Board found that the amendment was contingently approved subject to a concomitant rezone agreement that addresses needed transportation improvements not currently programmed in the County's Capital Facilities Plan. The change in designation to General Commercial (CH) applies to tax serial numbers 106100-000, 106104-000, 106104-007, 106112-000, 106124-000, 106128-000, 106128-005, 106132-000, 106136-000, 106140-000, 106146-000 located in the SE ¼ Section 6, Township 2 North, Range 2 East of the Willamette Meridian. In addition, the Board concluded that the residential designation is more appropriate for the subject parcels east of the I-205 Intersection, recognizing that the area is currently developed with single-family homes at a density consistent with the proposed R1-6. The change in designation to

Urban Low Density Residential (R1-6) applies to tax serial numbers 105689-000, 106361-476, 106361-478, 106361-480, 106361-482, 106361-484, 106361-486, 106361-488, 106361-490, 106361-492, 106361-494, 106361-496, 106361-498, 106361-500, 106361-502, 106361-504, 106361-506, 106361-508, 106361-510, 106361-512, 106361-514, 106361-516, 106361-518, 106361-520, 106361-522, 106361-524, 106361-526, 106361-528, 106361-530, 106361-532, 106361-534, 106361-536, 106361-538, 106361-540, 106361-542 located in the SE ¼ Section 6, Township 2 North, Range 2 East of the Willamette Meridian.

Clark County Capital Facilities Components

5. Those changes and additions relating to the updated School District Capital Facilities Plans of the **Camas School District Docket Item number CPZ2007-00007** and including the revised impact fees proposed in the modified capital facilities plan for the same School Districts, which plan was adopted by Ordinance 2004-09-02, is hereby approved as shown on these district's capital facilities plans and which sets forth impact fees of \$5,785.41 per single family residence and \$ 5,997.61 per multi-family unit for Camas School District (Exhibit 13).
6. Those changes and additions relating to the updated School District Capital Facilities Plans of the **Green Mountain School District Docket Item number CPZ2007-00008** and including the revised impact fees proposed in the modified capital facilities plan for the same School Districts, which plan was adopted by Ordinance 2004-09-02, is hereby approved as shown on these district's capital facilities plans and which sets forth impact fees of \$3,387.00 per single family residence for Green Mountain School District (Exhibit 14).
7. Those changes and additions relating to the updated School District Capital Facilities Plans of the **Hockinson School District Docket Item number CPZ2007-00009** and including the revised impact fees proposed in the modified capital facilities plan for the same School Districts, which plan was adopted by Ordinance 2004-09-02, is hereby approved as shown on these district's capital facilities plans and which sets forth impact fees of \$7,090.02 per single family residence and \$3,692.00 per multi-family unit for Hockinson School District (Exhibit 15).
8. Those changes and additions relating to the updated School District Capital Facilities Plans of the **La Center School District Docket Item number CPZ2007-00010** and including the revised impact fees proposed in the modified capital facilities plan for the same School Districts, which plan was adopted by Ordinance 2004-09-02, is hereby approved as shown on these district's capital facilities plans and which sets forth impact fees of \$6,891.90 per single family residence and \$5,290.80 per multi-family unit for La Center School District (Exhibit 16).
9. Those changes and additions relating to the updated School District Capital Facilities Plans of the **Vancouver School District Docket Item number CPZ2007-00011** and including the revised impact fees proposed in the modified capital facilities plan for

the same School Districts, which plan was adopted by Ordinance 2004-09-02, is hereby approved as shown on these district's capital facilities plans and which sets forth impact fees of \$1,112.00 per single family residence and \$1,421.00 per multi-family unit for Vancouver School District (Exhibit 17).

10. Those changes and additions relating to the updated School District Capital Facilities Plans of the **Washougal School District Docket Item number CPZ2007-00012** and including the revised impact fees proposed in the modified capital facilities plan for the same School Districts, which plan was adopted by Ordinance 2004-09-02, is hereby approved as shown on these district's capital facilities plans and which sets forth impact fees of \$ 5,339.39 per single family residence and \$ 6,530.00 per multi-family unit for Washougal School District (Exhibit 18). The Board's decision reflects a multi-family fee that is less than the requested fee of \$8,163.33 due to their concerns that high multi-family fees would discourage the development of this type of housing in Washougal.

Deferred Cases

11. CPZ2006-00004 NE 379th Street
The Clark County 20-Year Comprehensive Growth Management Plan Map Designation and corresponding Zoning Map for that certain property located at 4517 NE 379th Street, is retained as Resource Lands Agriculture (AG-20) zoning as indicated on the attached map (Exhibit 19). In the matter of **Annual Review item number CPZ2006-00004 NE 379th Street**, the Board concluded that designations of resource lands countywide should undergo comprehensive review and, therefore, the subject property should retain its resource land designation and this request should be included in the comprehensive review. At the conclusion of the comprehensive review should this property continue to retain its resource land designation, it may be placed on the next docket agenda for consideration at no cost to the applicant. Tax serial numbers 257006-000 located in the NW ¼ Section 25, Township 5 North, Range 1 East of the Willamette Meridian.
12. The Clark County 20-Year Comprehensive Growth Management Plan Map Designation and corresponding Zoning Map for that certain property located west of NE Ammeter Road and south of Stauffer Road at NE 23rd Street are retained as Forest Tier 1 (FR-80) zoning as indicated on the attached map (Exhibit 20). In the matter of **Annual Review item number CPZ2006-00001 Fern Prairie**, is hereby **denied** as recommend by the Planning Commission. Tax serial number 140027-000 located in the SW ¼ Section 20, Township 2 North, Range 4 East of the Willamette Meridian.
13. The Clark County 20-Year Comprehensive Growth Management Plan Map Designation and corresponding Zoning Map for that certain property located at 32619 NW Pekin Ferry Road are retained as Resource Lands Agriculture (AG-20) zoning. In the matter of **Annual Review item number CPZ2006-00008 Pekin Ferry Road**, the Board concluded that the existing AG-20 zoning was not appropriate for the subject site and that the rural designation is more appropriate for the site as indicated on the attached

map (Exhibit 21). Tax serial numbers 210 126-000 and 210129-000 located in the SW ¼ Section 5, Township 4 North, Range 1 East of the Willamette Meridian.

IV. MISCELLANEOUS

Section 9. Effective Date. This ordinance shall go into effect at midnight on the date of adoption, except for the expansion of urban growth boundaries and the corresponding comprehensive plan and zoning designations (Section 2(2)), which will take effect at 12:01 a.m. at January 1, 2008.

Section 10. Severability. If any section, clause, or phrase of this ordinance should be held invalid or unconstitutional by the Growth Management Hearings Board or a court of competent jurisdiction, such invalidity or unconstitutionality shall not affect the validity or constitutionality of any other section, sentence, clause or phrase of this ordinance.

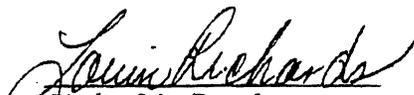
Section 11. Instructions to the Clerk. The Clerk of the Board shall:

1. Transmit a copy of this ordinance to the Washington Department of Community, Trade, and Economic Development within ten days of its adoption, pursuant to RCW 36.70A.106;
2. Record a copy of this ordinance with the Clark County Auditor; and
3. Cause notice of adoption of this ordinance to be published forthwith pursuant to RCW 36.70A.290.

ADOPTED this 25th day of September, 2007.

Attest:

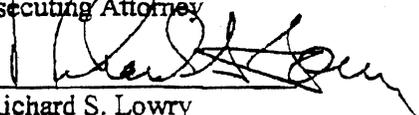
BOARD OF COMMISSIONERS
FOR CLARK COUNTY WASHINGTON


Clerk of the Board


Steve Stuart, Chair

Approved as to form only
ARTHUR D. CURTIS
Prosecuting Attorney

Betty Sue Morris, Commissioner

By 
Richard S. Lowry
Chief Civil Deputy

Marc Boldt, Commissioner

FILED
COURT OF APPEALS
DIVISION II

Court of Appeals No. 39546-1-II

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STATE OF WASHINGTON
BY
DEPUTY

COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION TWO

CLARK COUNTY, CITY OF LaCENTER, GM CAMAS, LLC,
MacDONALD LIVING TRUST and RENAISSANCE HOMES,

Respondents below,

v.

WESTERN WASHINGTON GROWTH MANAGEMENT HEARINGS
BOARD, JOHN KARPINSKI, CLARK COUNTY NATURAL
RESOURCES COUNCIL and FUTUREWISE,

Appellants.

AFFIDAVIT OF MAILING
BRIEF OF RESPONDENT MacDONALD LIVING TRUST

RANDALL B. PRINTZ, WSBA No. 13234
BRIAN K. GERST, WSBA No. 33035
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Living Trust

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Reeve Kearns, PC
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Linda Gill

Linda Gill

SUBSCRIBED and sworn to before me this 16th day of
December, 2009.

Ramona Z. A. Taylor

Notary Public in and for the State of
Washington, residing in Clark County
My Commission Expires: 01-15-10

