

APPENDIX B: AGRICULTURAL LANDS ANALYSIS

AGRICULTURAL LANDS ANALYSIS

Rural Industrial Land Bank Candidate Alternative Sites

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Clark County Community Planning

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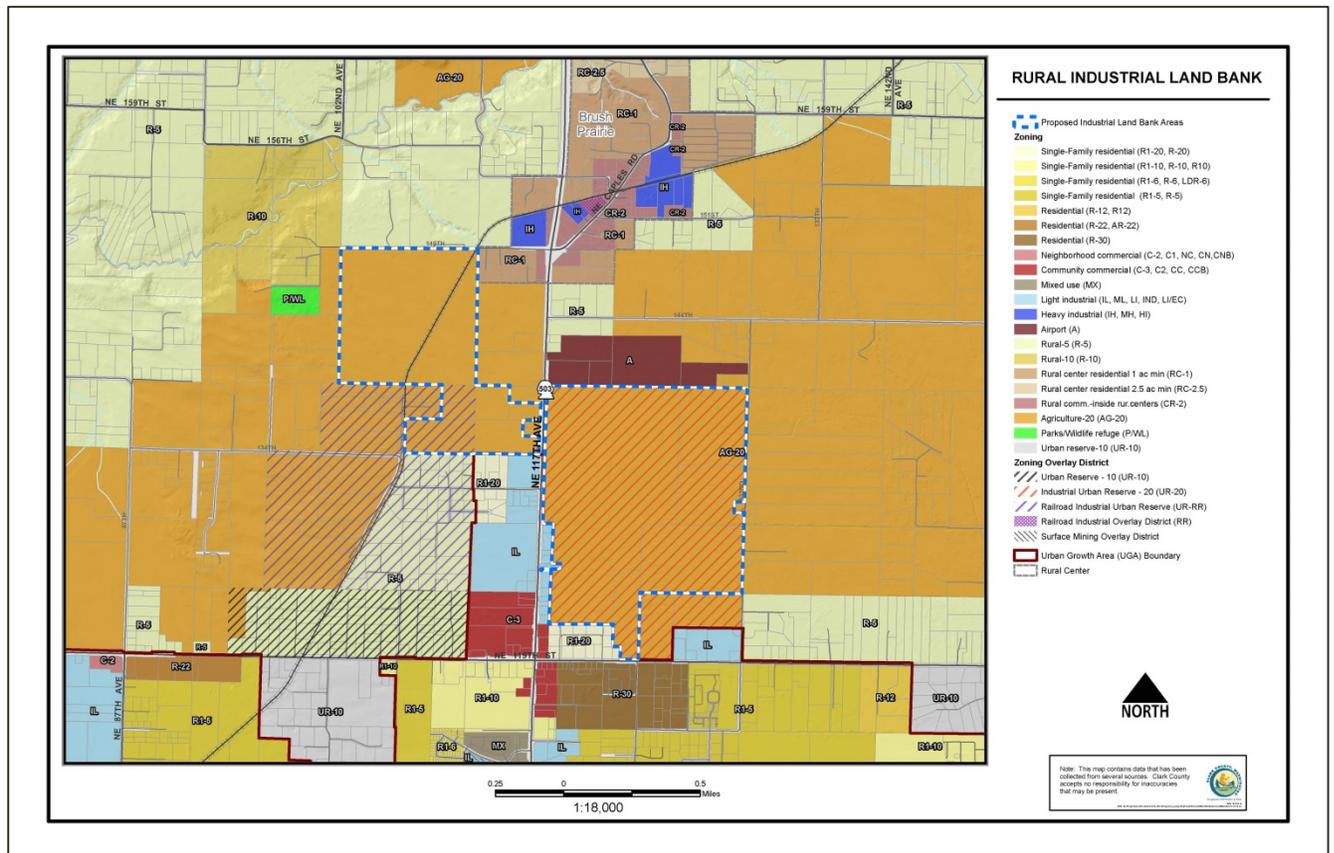
1.0 INTRODUCTION AND EXECUTIVE SUMMARY

In 1996, the Growth Management Act (GMA), RCW 36.70A, was amended with provisions to allow major industrial developments to be sited outside of urban growth areas (UGAs). RCW 36.70A.367 allows counties to establish up to two rural industrial land banks (RILBs) with the intent that they develop as industrial properties. In 2014, Clark County received a docket application to establish an RILB on properties that straddle SR 503 north of the Vancouver UGA:

- Ackerland property west of 117th Avenue, 223.72 acres.
- Lagler property east of 117th Avenue, 378.71 acres.

Exhibit 1 below shows these properties. Presently the zoning for both properties is Agriculture (AG-20). The requested zoning is Light Industrial (IL); the IL zone uses are listed in Clark County Code (CCC) Section 40.230.085.

Exhibit 1. Docket Application – RILB: Ackerland and Lagler Properties



Source: Clark County GIS August 2014

The Clark County Comprehensive Plan identifies the two properties in Exhibit 1 as agricultural lands of long-term commercial significance. Portions of the properties are identified as Railroad Industrial Reserve Overlay or Industrial Reserve Overlay, though implementing zoning has not been applied.

The sites were studied for a variety of agricultural and employment uses, including urban industrial uses, in a 2007 Environmental Impact Statement (EIS). Prior Comprehensive Plan amendments included the properties in the Vancouver UGA, but the expansions were removed after a Growth Management Hearings Board determination and compliance order requiring the County to do so. The sites have not previously been evaluated as part of potential RILB.

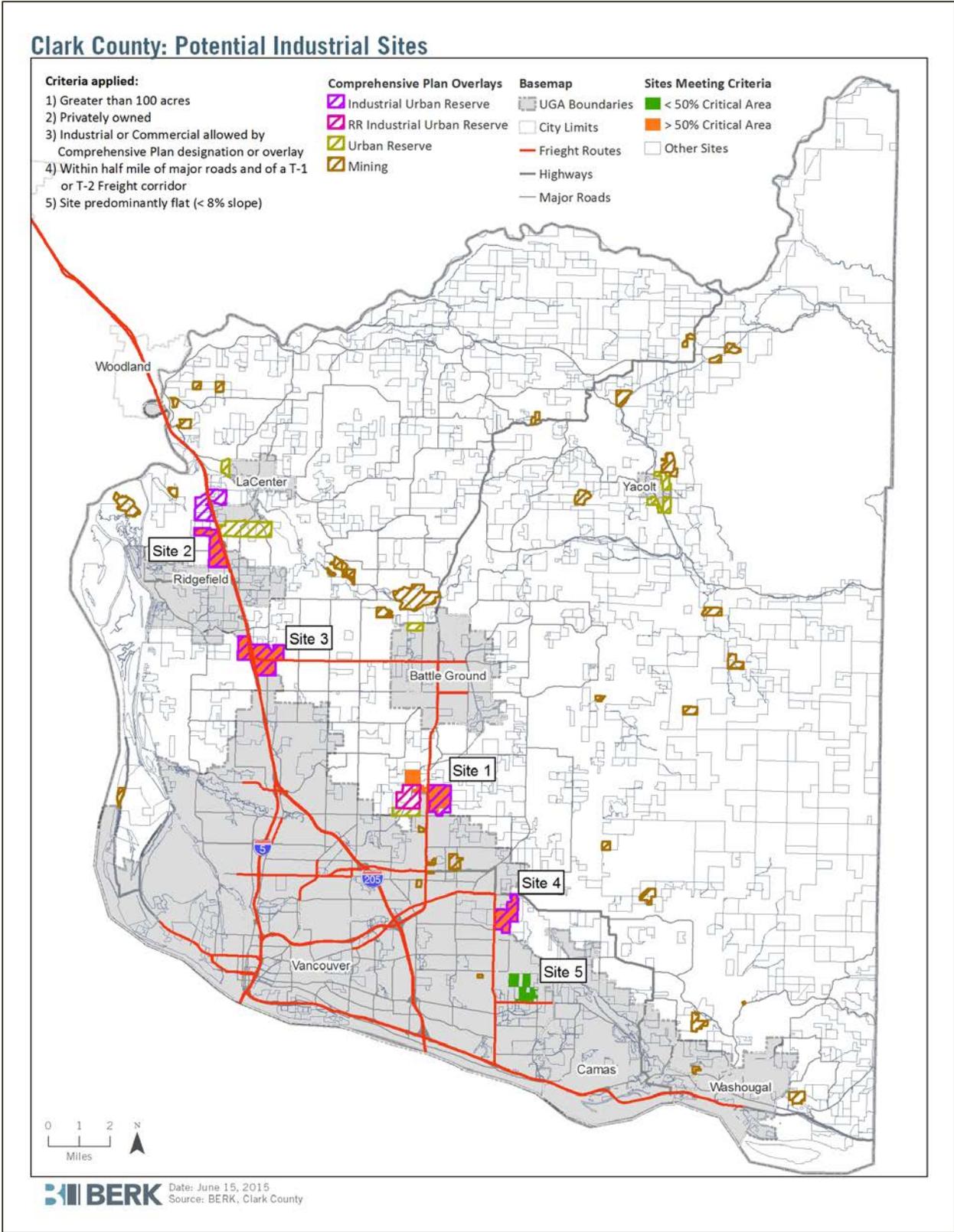
Key steps in the RILB process include:

- Identifying locations suited to major industrial use,
- Identifying the maximum size of the bank area,
- Developing a programmatic environmental review with an inventory of developable land and alternative sites, and
- Developing comprehensive plan amendments and development regulations for the bank and future specific major industrial developments.

An important step in the RILB process is an inventory of developable land and analysis of the availability of alternative sites within UGAs and the long-term annexation feasibility of sites outside of UGAs (RCW 37.70A.367(2)). As a result of a draft inventory applying criteria of what makes a good industrial site (available under separate cover; BERK et al. September 2015), five sites have been identified as candidate alternative sites for further evaluation, including the docket site. See Exhibit 2. Sites 1 through 4 have been designated as having long-term significance for commercial agriculture. Site 5 does not contain lands designated as long-term significance for agriculture.

As part of identifying and designating sites suitable for a RILB, the County must consider appropriate zoning, and must “mitigate adverse impacts on designated agricultural lands, forest lands, and mineral resource lands.” (RCW 36.70a.367(3)(j)). This document evaluates candidate alternative sites in terms of the degree to which the lands satisfy the agricultural land classification criteria in WAC 365-190-050. It further considers the area surrounding candidate sites in relation to the minimum criteria to classify agricultural land.

Exhibit 2. Rural Industrial Land Bank, Candidate Sites Selected for Further Evaluation



1.1 Document Contents

This document is arranged to present technical maps and data, an analysis of the criteria, and summary conclusions for each site that contains designated agricultural land, as follows:

1. Introduction and Executive Summary
 - 1.1. Document Contents
 - 1.2. Executive Summary
2. Site 1 and Areawide Study Area
 - 2.1. Study Area Description
 - 2.2. Maps Reviewed
 - 2.3. Agricultural Land Classification Criteria Analysis
 - 2.4. Summary and Conclusions
3. Site 2 and Areawide Study Area
 - 3.1. Study Area Description
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4. Site 3 and Areawide Study Area
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5. Site 4 and Areawide Study Area
 - 5.1. Study Area Description
 - 5.2. Maps Reviewed
 - 5.3. Agricultural Land Classification Criteria Analysis
 - 5.4. Summary and Conclusions

1.2 Executive Summary

All of the candidate sites with designated agricultural land are evaluated in Sections 2 through 5 of this study. A summary of the analysis across each site appears in the following Exhibit 3. Results show:

- The sites are largely in agricultural use, with Site 3 itself having more rural residential and non-agricultural uses.
- Site 1 has the greatest amount of prime soils but other sites with a majority of prime soils including prime soils if drained include Sites 3 and 4. All sites have variable soil capability classes with higher class soils in Sites 1 and 3.
- Parcel sizes vary among all Sites from 0.26 to over 100 acres in size, but are larger in Sites 1 and 4 and moderate in Sites 2 and 3. All sites abut Urban Growth Areas (UGAs). Sites 1 and 4 in particular have greater proximity to urban levels of development and urban infrastructure including major roads, freight routes, and existing sewer and water lines. Site 3 is traversed by major freight routes carrying urban traffic and has water service; sewer service to abutting UGA lands is under planning and construction. Site 2 has less urban services in the area, but sewer service is planned in the Ridgefield UGA.
- Lands in agricultural use tend to be in current use taxation status and are taxed at below market value. All sites are in proximity to market areas – the nearby cities.

- The agricultural activities are taking place in the context of declining large and mid-sized farms and general increase in urban oriented, high product value farms.
 - Dairy farms have greatly decreased in the County. Challenges to maintaining or expanding operations include expensive land values, management of manure and water quality standards, and other issues.
 - There are farm operations that sell products regionally (Site 1 selling to Tillamook Creamery and Site 4 selling milk products in Pacific Northwest). Others may sell some products locally (e.g. Site 2 tree farm and Site 3 areawide includes a farm selling direct to locals).
 - There is no known interdependence among the agricultural businesses in the broader areawide study areas.

Exhibit 3. Comparison of Sites in relation to Agricultural (Ag) Designation Criteria

WAC 365-190-050 Criteria	Site 1	Site 2	Site 3	Site 4
Gross parcel acres	602	412	764	366
Present land use designations	Agriculture (Ag) with Industrial Urban Reserve & Railroad Industrial Urban Reserve Overlays	Ag with Industrial Urban Reserve Overlay	Rural Commercial, Rural-5, and Ag with Industrial Urban Reserve Overlay	Ag and Rural-5 with Industrial Urban Reserve Overlay
WAC 365-190-050 Criteria				
Areawide analysis conducted	3,196 acre Ag designation area	1,319 acre Ag designation area	2,109 acre Ag designation area	1,533 acre Ag designation area
Regulations conserving agriculture adopted	Regulations allow agriculture in all zones and conserve Ag designated lands.			
Not already characterized by urban growth	Parcels are in dairy, other agricultural or rural residential use.	Parcels are in agricultural or rural residential use.	Parcels are in agricultural or rural residential use.	Parcels are in dairy, other agricultural or rural residential use.
Used or capable of being used for ag. production	Used for ag: dairy and hay/silage.	In use for ag per current use records.	In use for ag per current use records.	Used for ag: dairy and other ag.
Land-capability classification	Contains Class 1, 2, and 3 soils with some Class 6 soils. Mostly Classes 1 and 3.	Contains Classes 3, 4, and 6. Mostly Class 3.	Contains Classes 1, 2, 3, 4 and 6 soils. Mostly Class 3.	Contains Class 1, 2, 3 and 6 soils; mostly Class 6.
Classification of prime and unique farmland soils	About 76% of soils are considered prime farmland, and 23% is prime farmland if drained (site is drained); total 99% prime soils.	About 34% of soils are considered prime farmland, and 11% is prime farmland if drained. Drainage unknown, but likely. Total 45% prime soils.	About 55% of soils are considered prime farmland, and 4% are prime farmland if drained. Drainage unknown, but likely. Total 59% prime.	About 30% of soils are considered prime farmland and 29% is considered prime farmland if drained. Site is in a drainage district. If drained, prime soils total 59%.

AGRICULTURAL LANDS ANALYSIS –
ASSOCIATED WITH RURAL INDUSTRIAL LAND BANK

WAC 365-190-050 Criteria	Site 1	Site 2	Site 3	Site 4
Availability of public facilities, including roads used in transporting agricultural products	SR 503 splits the two properties, is a freight route, and carries urban traffic. Water lines run along SR 503 and NE 119 th and NE 149 ^h Street and serve the properties. Sewer is located in the UGA south of the sites around NE 119 th Street. A school and an airport lie adjacent to the site.	I-5 is a freight route, and carries urban traffic. NW 289 th Street and NW 31 st Avenue are Rural Major Collectors. There are no water or sewer lines within the site area or nearby. Future service is planned to the south in the Ridgefield UGA.	I-5 is a freight route, and carries urban traffic. SR 502 also carries urban volumes and is a state designated freight route. Traffic on SR 502 is expected to double in the next 20 years. Some water lines traverse the area. Sewer lines are planned through the study area to connect the Ridgefield UGA to the Salmon Creek Wastewater System.	SR 500 is on the northern border of the site and NE 162 nd is a state designated freight route. Sewer and water lines are available on NE 162 nd Street.
Tax status, including current use tax assessment	All of the subject property is in the agricultural current use taxation program.	A majority of the property is in the program, with few exceptions in the northwest and southeast corners.	Parcels with AG-20 zoning are in the program as well as Rural zoned property in ag use. Many rural-zoned properties are not in the program.	A majority of the subject property is in the current use taxation program. Some rural parcels with homes are not included.
Availability of public services	Served by drainage district, school district, fire districts, and sheriff. Small private airport abuts.	Served by school district, fire district, and sheriff.	Served by school district, fire district, and sheriff.	Served by drainage district, school district, fire district, and sheriff.
Relationship or proximity to urban growth areas	The site abuts the Vancouver UGA on the south. The Battle Ground UGA is nearby to the north.	The site abuts the north boundary of the Ridgefield UGA and is close to the west boundary of the LaCenter UGA.	The site abuts the south boundary of the Ridgefield UGA and abuts the north boundary of the Vancouver UGA.	The site is adjacent to the Vancouver UGA on its western and southern borders. (The areawide study area abuts Camas UGA.)
Predominant parcel size	The property contains parcels of just less than 0.26 acres to more than 100 acres.	The property contains parcels of 0.26 to 75 acres.	The site contains parcels of less than 0.26 to 75 acres. The majority of parcels range in size from 0.26 to 20 acres.	The property contains parcels of 1 to 100 acres or greater.
Land use settlement patterns and their compatibility with agricultural practices	The property is generally open in character, except for the dairy buildings and some homes. UGA territory is to the south and commercial and residential uses have been developed.	The property is generally open in character, except for the agricultural related buildings and some homes. UGA territory is to the south and is residential.	The property is generally open in character, but there is development along major roads (e.g. NE 10 th Ave). UGA territory is to the south and northwest.	The property is generally open in character, except for the agricultural related buildings at the southwest corner of the site, and homes. UGA territory is to the south, west and northwest.

**AGRICULTURAL LANDS ANALYSIS –
ASSOCIATED WITH RURAL INDUSTRIAL LAND BANK**

WAC 365-190-050 Criteria	Site 1	Site 2	Site 3	Site 4
Intensity of nearby land uses	Residential density south of NE 119 th Street ranges from 5-10 units /acre, 10-20 units /acre, and 20+ units /acre.	Densities within the Ridgefield UGA are generally 5-10 units per acre.	Densities in UGAs near the site are: 5-10 units per acre, 10-20 units per acre and some 1-5 units per acre.	Urban densities in adjacent UGA lands are typically 5-10 units per acre. Some mixed use zoning abuts to the north.
History of land development permits nearby	There have been a series of permit applications south of the sites along NE 119 th Street and north of NE 149 th Street.	Most permits are mapped in the Ridgefield and LaCenter UGAs.	There have been permits within and surrounding Site 3; with a concentration of permits in the UGAs.	Most permit activity has occurred in areas abutting and near to the site in the Vancouver UGA.
Land values under alternative uses	Land values for non-agricultural uses of the Lagler and Ackerland properties are significantly greater than for agricultural uses. With the land discount included, the total value of the dairy buildings and land is 39% of its market value.	Land that is in current use assessment is taxed at below its market value typically at less than half.	Properties under current use assessment in the study area are reduced compared to taxable value. Depending on if there are structures, the taxable value is 16%-66% of the market value.	The dairy is in current use taxation. Some land is not taxed and other land is taxed at just over 10% of its market value.
Proximity to markets	In close proximity to Vancouver UGA market.	Adjacent to Ridgefield UGA.	Abuts Vancouver and Ridgefield UGAs. West of Battleground UGA.	Adjacent to the Vancouver UGA. (The areawide study area abuts Camas UGA.)
May consider food security, local food, artisans	In Clark County the number of small farms has been increasing over time, and represents more intensive, value-added, urban-oriented farming. The Clark County Food System Council addresses food security in the County and is promoting the use of locally grown food. The Lagler dairy does not sell its product locally.	See Site 1 analysis. Federal mapping indicates land is in grass/pasture, deciduous forest, and caneberries. ¹ State information shows a predominance of hay/silage. The Washington State University (WSU) Farm Locator indicates there is a tree farm in the study area: Finn Family Tree Farm.	See Site 1 analysis. The area is in hay/silage predominantly according to federal and state information. It is not known if this site provides products to the local market. To the east in the broader study area there is a farm selling direct to consumers.	See Site 1 analysis. Also, the property is owned by Andersen Dairy, based in Battle Ground. Their milk and other dairy products are sold throughout the Pacific Northwest.

¹ Terminology corrected in responses to comments January 2016.

WAC 365-190-050 Criteria	Site 1	Site 2	Site 3	Site 4
Designating agricultural resource lands sufficient to maintain and enhance the economic viability of the ag. industry in County over long-term	<p>All sites are in agricultural uses to some degree. Most of the land acres appear to be in hay/silage but two dairies are located in Sites 1 and 4. There are also tree farms and vegetable and wheat farms within the sites or broader areawide study areas.</p> <p>Rural lands study findings show the number of farms has been increasing (e.g. 2002-2007) but has been experiencing a decline in average size and are becoming more urban oriented. Since 2007 there was a slight decline in the total number of farms in the 2012 Census of Agriculture. Based on the Rural Lands Study², there has been a “decline in the number of commercial and mid-sized farms in Clark County between 1997 and 2007, and presumably through 2012 (relayed anecdotally from key informants).” The long-term outlook for larger farms in Clark County is in transition due to water rights, labor, and access farm supportive services.</p> <p>The value of milk production from cows in 2012 is \$14.5 million out of the total value of all agricultural products at \$50.9 million. Presently, milk production is a relatively large share in the total value of agricultural products, though the long-term trends of large and mid-size farms is one of decline. The number of dairies in the County has steadily decreased in the county according to the US Census of Agriculture; though the number of dairies was at 25 in both the 2002 and 2007 Census reports, dairies have since been reduced to 9 as of 2012. Reasons for the decline in dairies may include: The cost of running a smaller dairy has increased, as have regulatory requirements such as water quality. Lower land prices, lower rainfall, and the efficiencies gained with a larger operation and management have led many dairies to move from Western Washington to Eastern Washington. Even if there is current use taxation, the cost to purchase the land is based on market value. This is especially true for a dairy farm which requires a larger land base to handle nutrient application from the manure generated. Waste management costs on the west (wet) side of the mountains increase with the relatively plentiful rain (increases the material needed to spread; limits times of year material can be spread due to environmental concerns, etc.).</p> <p>Hay and forage land represents the top cropland in acres in the County, 17,541 acres of 74,758 acres in farms. The number of farms with crops and hay shows an increase between 2002 and 2007 and a more recent decline in 2012.</p>			
May classify ag. lands of local importance	The County has not designated agricultural land of local importance. This is an optional policy choice.			

Source: BERK Consulting 2015

² BERK. 2012. Clark County Rural Lands Study. Available: <http://www.clark.wa.gov/planning/rurallands/index.html>.

2.0 SITE 1 AND AREAWIDE STUDY AREA

2.1 Study Area Description

This evaluation addresses the following study areas – the Docket Application Site 1 and an area similarly designated and zoned surrounding Site 1. See Exhibit 4.

Exhibit 4. Site 1 and Areawide Study Area Description

Description	Comments
Site 1: Docket Application - Ackerland and Lagler Site	<p>Site 1 includes two properties that straddle SR 503 north of the Vancouver UGA:</p> <ul style="list-style-type: none"> • Ackerland property west of 117th Avenue, 223.72 acres. • Lagler property east of 117th Avenue, 378.71 acres. <p>See Exhibit 1 and the map series in Section 2.2.</p>
Areawide Analysis: AG-20 Zoning in Vicinity of Site 1	<p>The areawide study area includes Agriculture (Ag) designated land between the UGAs of Battleground and Vancouver, including areas abutting Site 1 and generally continuing north, east, south, and west until another non-Ag designation abuts, or until the contiguous Ag pattern changes (such as to the east where the Ag designated area is split by Rural designations or the property takes access from other roads). See Section 2.2 for a map series.</p>

2.2 Maps Reviewed

A series of maps were reviewed as described in Exhibit 5 in order to conduct the Site 1 and Areawide analysis of agricultural land designation criteria in Section 2.3.

Exhibit 5. Maps Reviewed: Site 1 and Areawide Study Area

Maps	Comments
Comprehensive Plan	<p>Site 1: Eastern property of 378.71 acres fully in Industrial Urban Reserve with Agriculture designation. About 30 acres of western 234 acres are in the Railroad Industrial Urban Reserve. Thus, most of western property is outside of the overlays. All property is designated Agriculture. See Exhibit 6.</p> <p>Areawide: Agriculture. Area south of Ackerland property has Agriculture with Railroad Industrial Urban Reserve Overlay. See Exhibit 6.</p>
Zoning	<p>Site 1: Agriculture-20 (AG-20). See Exhibit 6 and Exhibit 8.</p> <p>Areawide: AG-20, small portion of Airport. See Exhibit 6 and Exhibit 8.</p>
Soils	<p>Site 1: Hillsboro silt loam, Dollar loam, McBee silt loam, and Hillsboro loam make up most of the study area soils. Hillsboro silt loam, Hillsboro loam, and Dollar loam are considered prime farmland soils, but McBee silt loam is considered prime farmland if drained. Classes of soil include 1, 2, 3 and 6. See Exhibit 11 and soil information in Appendix A.</p> <p>Areawide: Soil types are similar to Site 1. Soil capability classifications show a mix of Class 1-4 and 6-7 types. Classes 1 and 2 are more prevalent to the west of SR 503 and a greater mix of soil capability classes is found east of SR 503. However, most of the area is considered prime farmland or prime farmland if drained, according to the Natural Resource Conservation Service (NRCS). See Exhibit 11 and Appendix A.</p>
Topography	<p>Site 1: Generally flat 0-5% per soils survey; maximum slope 8-15% per SEPA checklist submitted with docket application. See Appendix A.</p> <p>Areawide: Slopes are generally 0-5% per NRCS soil data. See Appendix A.</p>

Maps	Comments
Aerial photography	<p>Site 1: Primary structures in study area are dairy buildings east of SR 503 on Lagler property. See Exhibit 6. There are manure treatment lagoons on the Lagler property, and ditches on both properties.</p> <p>Areawide: Agricultural structures and agricultural land extend through most of the study area. There are residential uses on the agricultural properties and pockets of residential neighborhoods such as to the south (outside of the study area) of the Ackerland Site and to the east, and south of the Lagler site (outside of the study area). Southwest of the Ackerland site in the study area is Glennwood Heights Elementary School and Laurin Middle School. Southeast of the Lagler site in the study area is Hartwood Golf Course.</p>
Current Use	<p>Site 1: Agriculture with current use taxation. See Exhibit 8.</p> <p>Areawide: Nearly all parcels are in the current use taxation program. See Exhibit 8. See above for land uses in the study area.</p>
Parcel size	<p>Site 1: Variable. One parcel on the east is 221 acres, one is 0.26 acre and others are 20-75 acres. Parcels on west range from 5 to 156 acres. See Exhibit 7.</p> <p>Areawide: The Ackerland and Lagler properties are the largest properties in the study area. Other sites are 0.26 - 1, 5-20 acres and 20-75 acres in size. See Exhibit 7.</p>
Infrastructure: Roads, Sewer, Water	<p>Site 1: SR 503 splits subject property. Existing and future arterial classes serve properties. Water lines run along SR 503 and NE 119th and NE 149^h Street and serve the properties. Sewer is located in the UGA south of the sites around NE 119th Street. See Exhibit 9.</p> <p>Areawide: Water lines traverse the area. Sewer lines are closest located south of the area in the Vancouver UGA and along SR 503 in proximity to the Lagler Property. SR 503 serves as an arterial and freight route. See Exhibit 9.</p>
Floodplains	Not applicable
Wetlands	<p>Site 1: Wetlands are mapped, as are hydric soils. See Exhibit 10. Also a critical areas report (Anchor QEA February 2015) indicates there are wetlands likely Category III that are less extensive than the mapped wetlands.³ See Appendix B.</p> <p>Areawide: Wetlands are mapped throughout the study area, particularly to the east of SR 503. See Exhibit 10.</p>
Streams	<p>Site 1: There are no onsite streams. Site 1 is connected or adjacent to tributaries to Salmon Creek near the intersection of SR 503 and the railroad tracks on the northern portion of the site. (Anchor QEA February 2015) See Appendix B.</p> <p>Areawide: Streams are found in the north and east of the study area. See Exhibit 10.</p>
Aquifer Recharge	<p>Site 1: Extensive Category 2, Limited Category 1. See Exhibit 13.</p> <p>Areawide: Same as for Site 1, See Exhibit 13.</p>

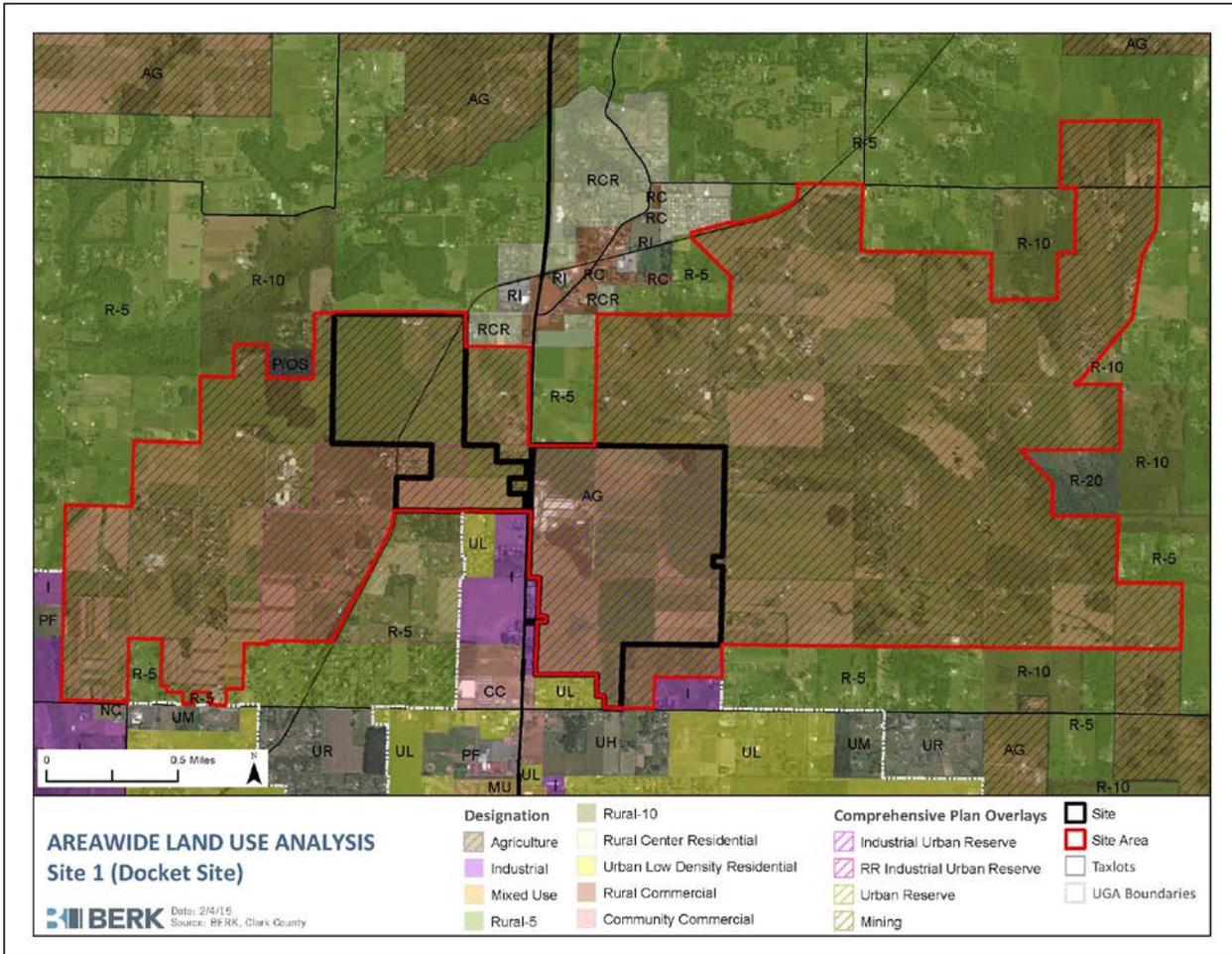
³ Based on the Anchor QEA reconnaissance and research (February 2015), due to the intensity of land management at Site 1, wetlands as mapped in the NWI and County dataset appeared significantly different than conditions encountered in the field, where the distribution of potential wetland areas appeared much more limited. See Appendix B.

Maps	Comments
Geologic Hazards	Site 1: No presence of landslide or erosion hazards; very low to low liquefaction hazards, except in peat soils. See Appendix B. Areawide: Same as Site 1.

Site 1 and Areawide Maps

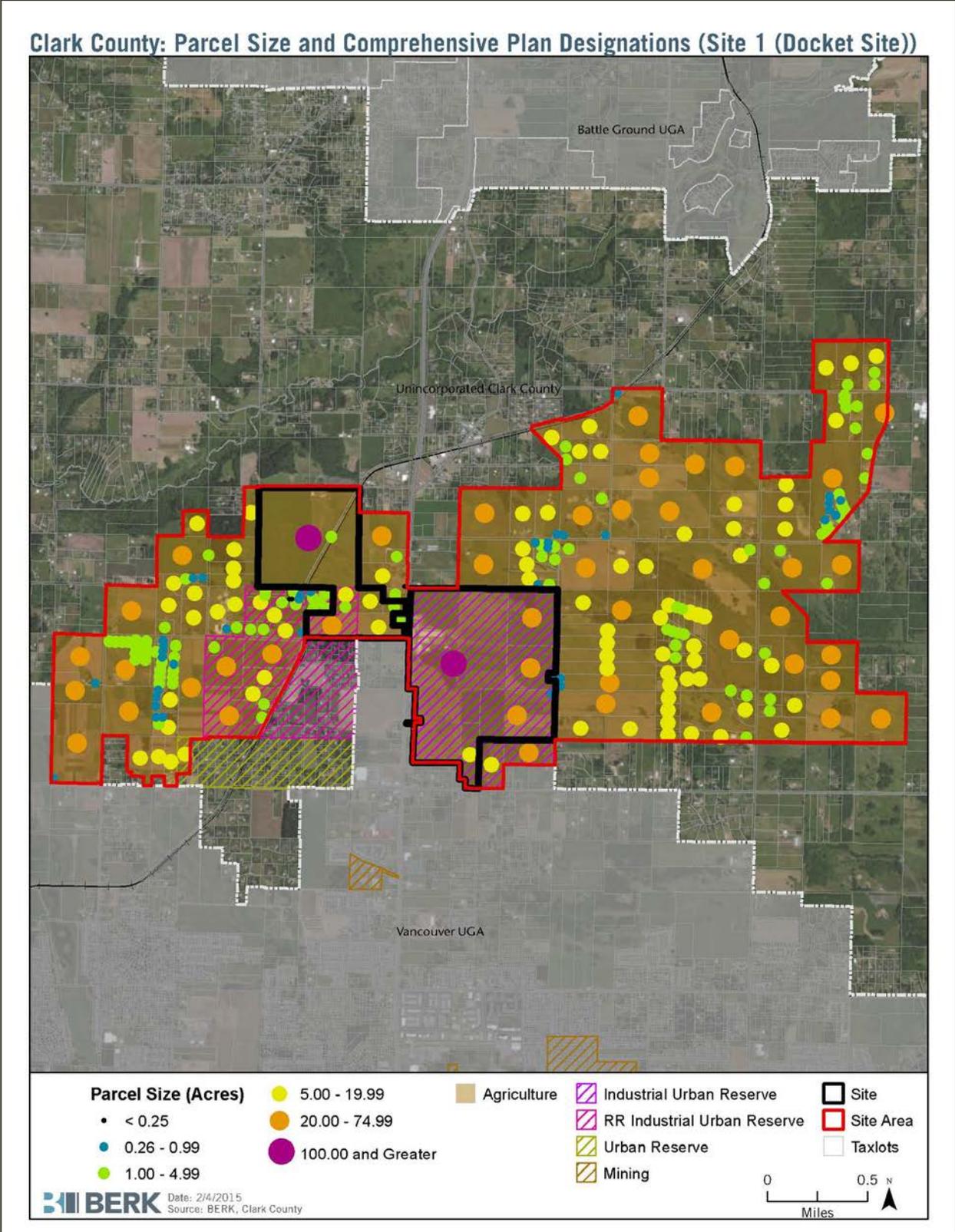
This Section presents maps specific to Site 1 and the areas surrounding it regarding Comprehensive Plan designations, Zoning designations, parcel size, infrastructure, critical areas, soils and capability class, and other relevant topics. These maps are cross-referenced throughout the analysis.

Exhibit 6. Site 1 Areawide Vicinity Map and Comprehensive Plan Land Use



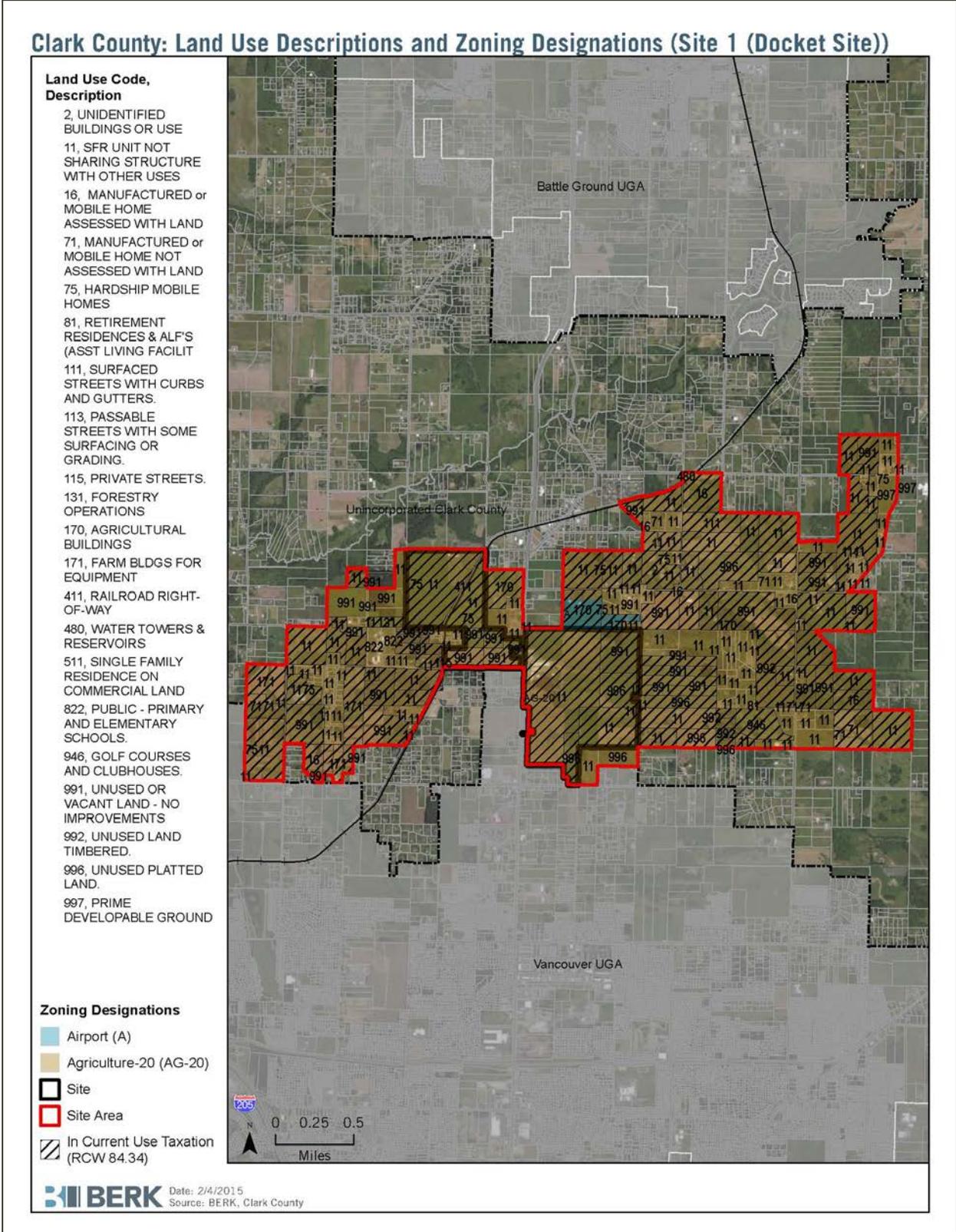
Source: BERK Consulting 2015

Exhibit 7. Site 1 Docket and Areawide Comprehensive Plan Designation and Parcel Sizes



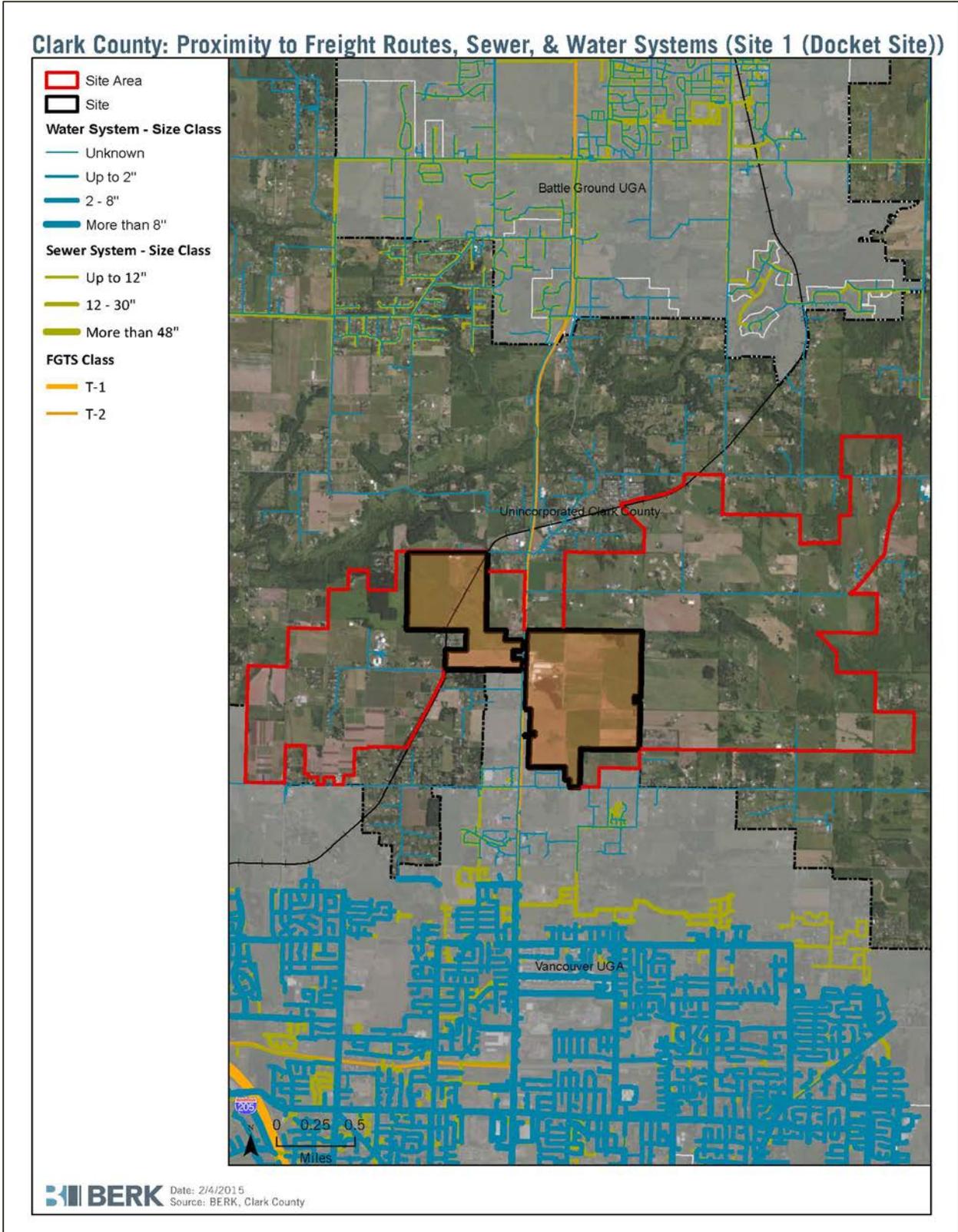
Source: Clark County GIS, BERK Consulting 2015

Exhibit 8. Site 1 Docket and Areawide Current Land Uses and Zoning



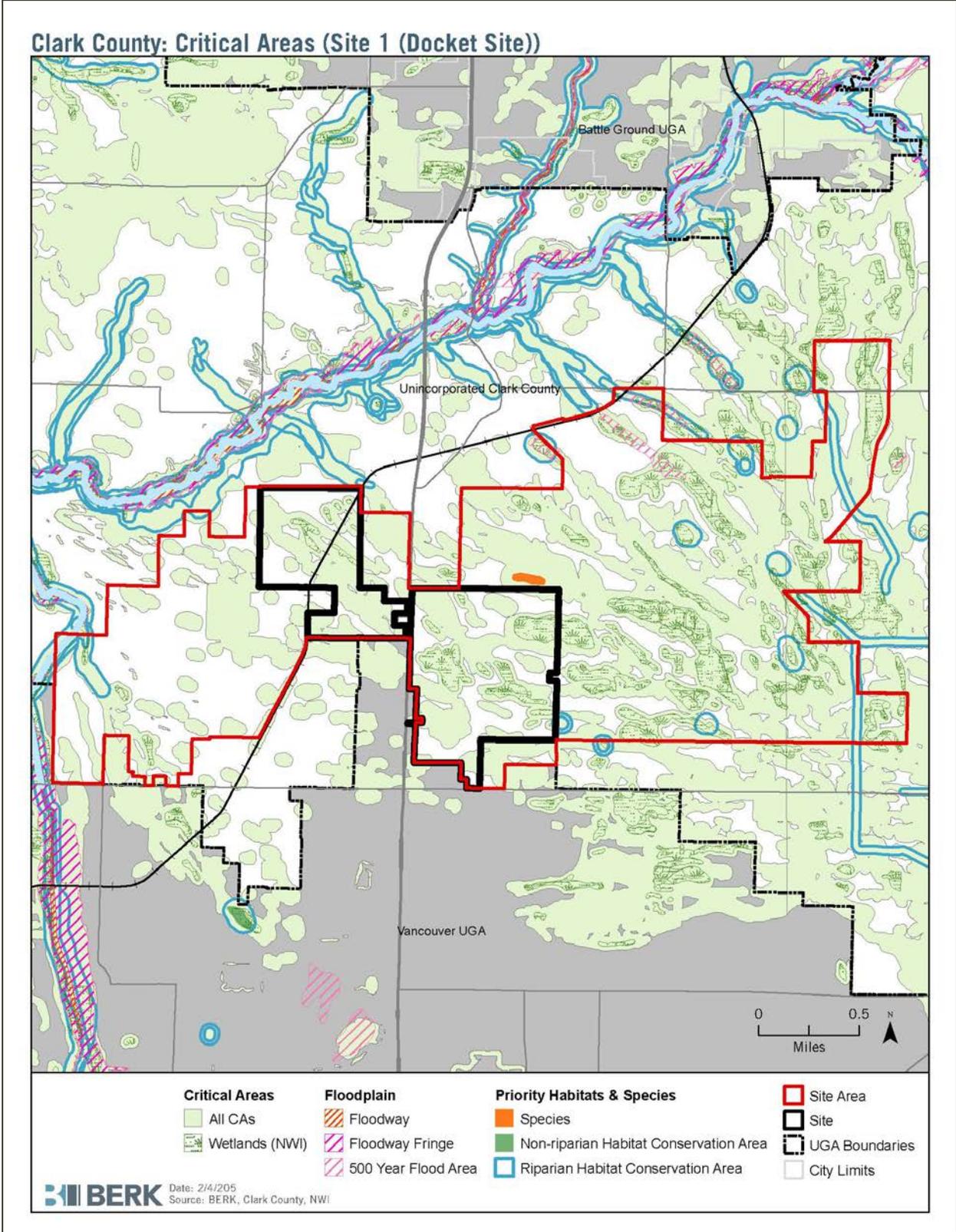
Source: Clark County GIS, BERK Consulting 2015

Exhibit 9. Site 1 Docket and Areawide Proximity of Freight Routes, Water, and Sewer Facilities



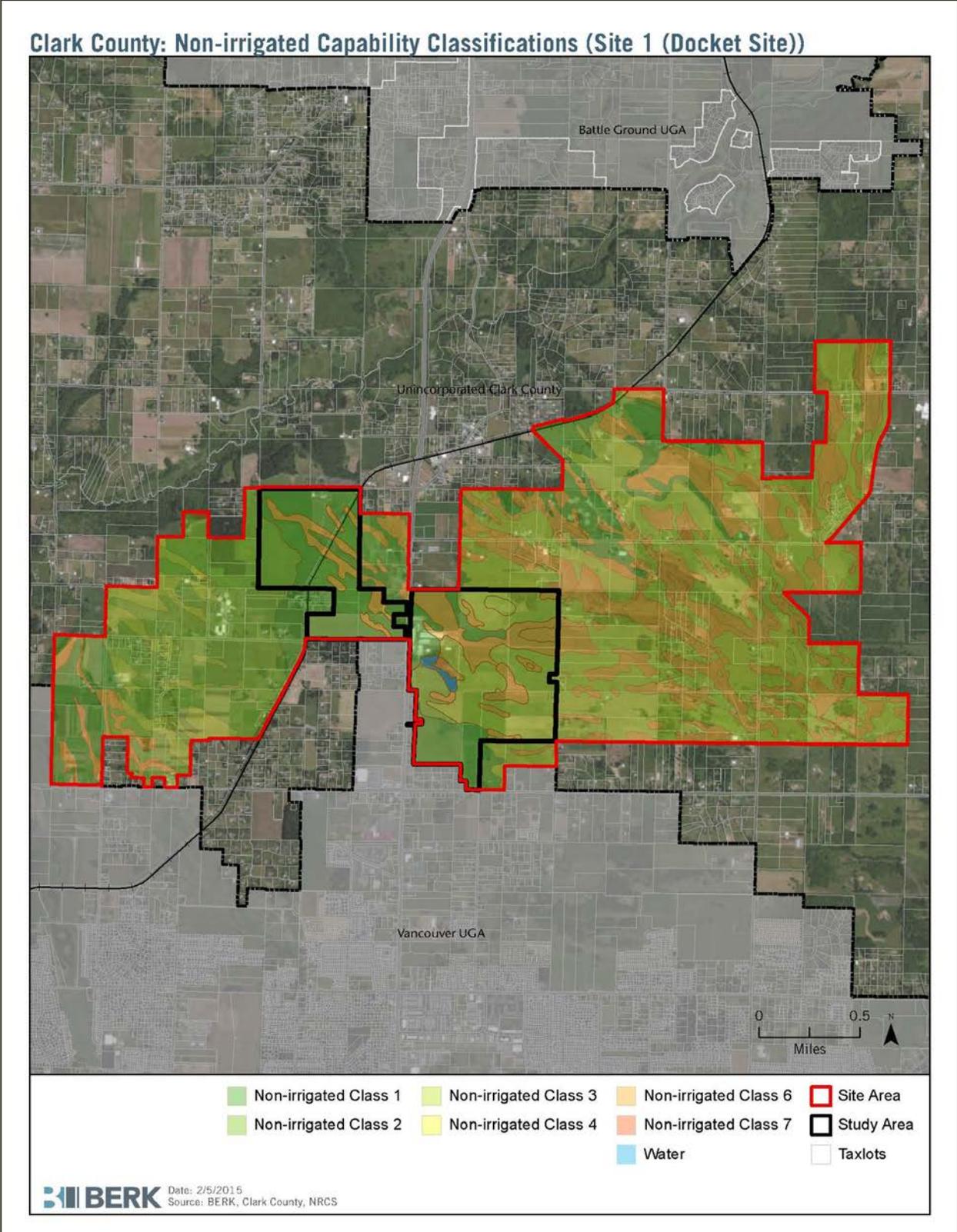
Source: Clark County GIS, BERK Consulting 2015

Exhibit 10. Site 1 Docket and Areawide Mapped Presence of Critical Areas



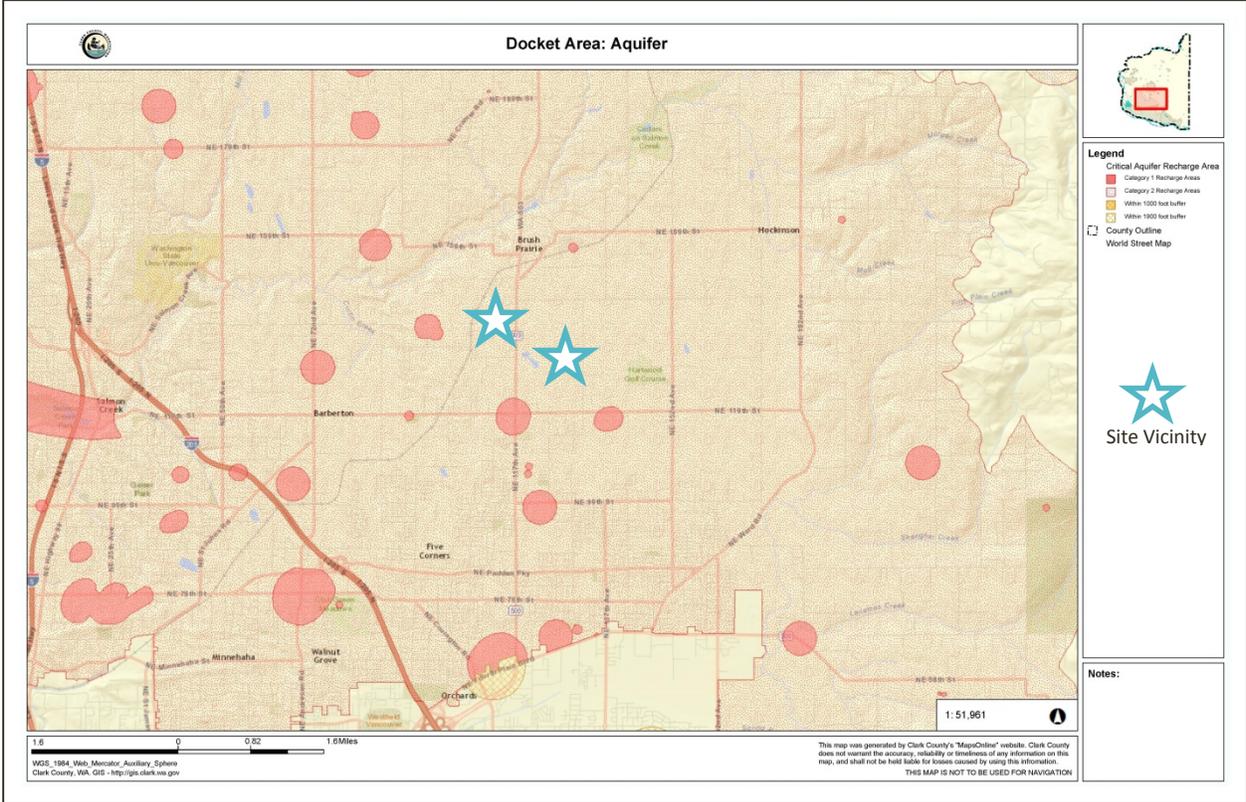
Source: Clark County GIS, BERK Consulting 2015

Exhibit 11. Site 1 Docket and Areawide Soil Capability Classes



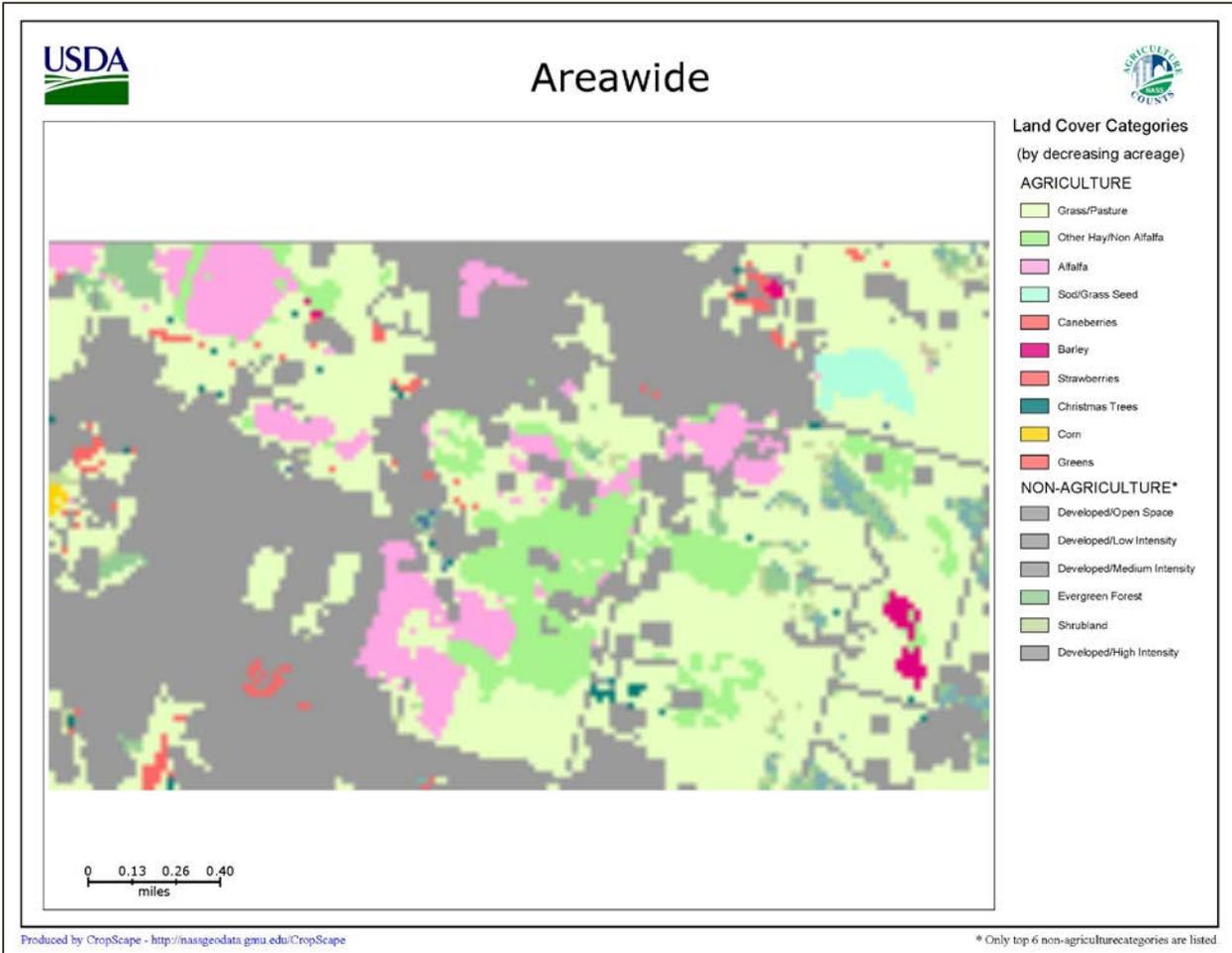
Source: Clark County GIS, BERK Consulting 2015

Exhibit 13. Site 1 Docket and Areawide Aquifer Classifications in Vicinity



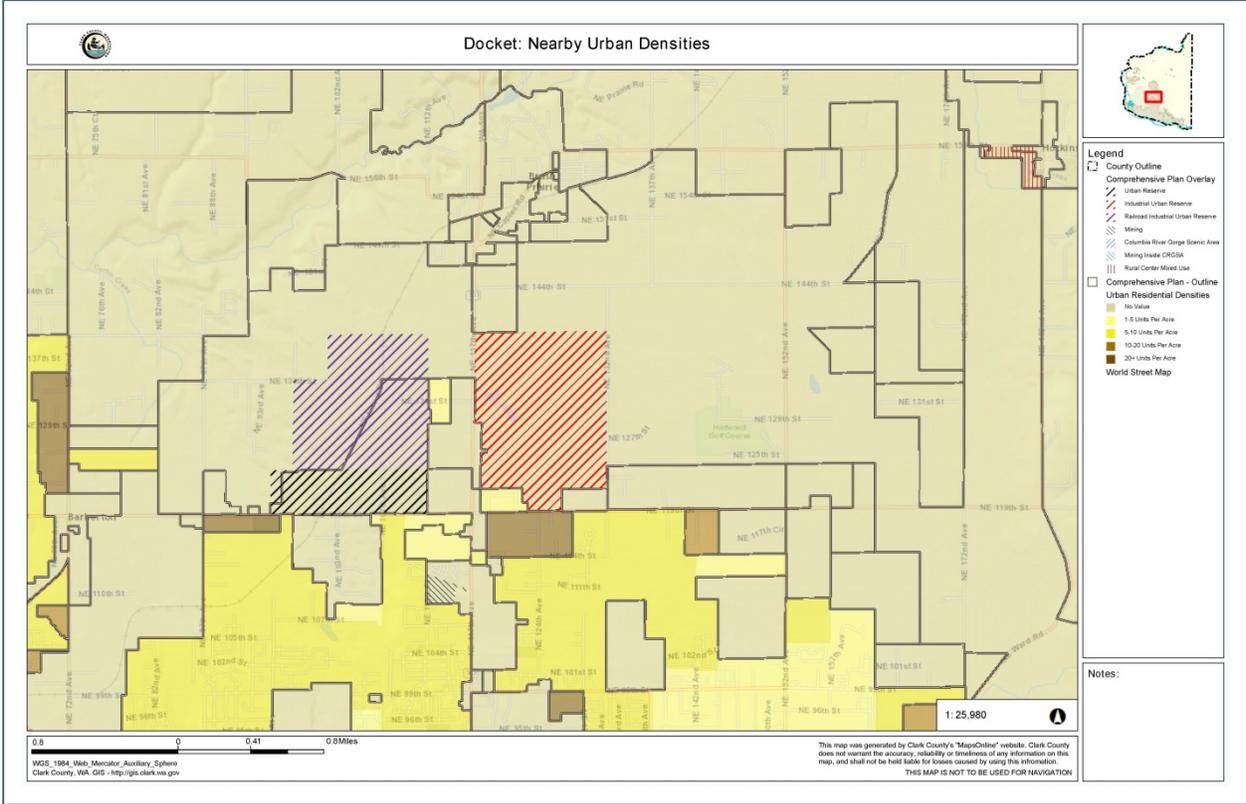
Source: Clark County GIS 2015

**Exhibit 14. Site 1 Docket and Areawide
United States Department of Agriculture (USDA) CropScape Map**



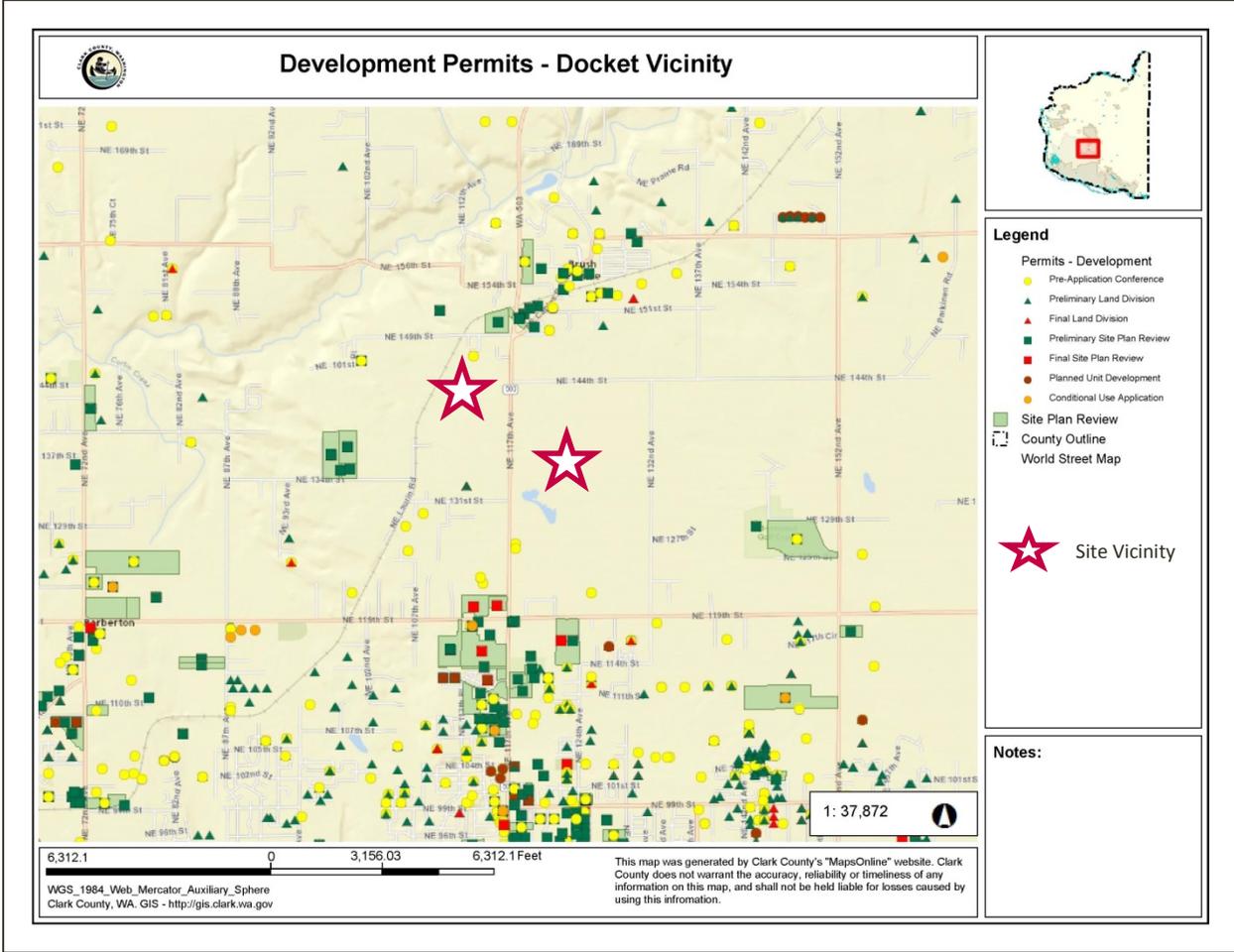
Source: USDA 2014

Exhibit 15. Site 1 and Areawide Nearby Urban Densities



Source: Clark County GIS 2014

Exhibit 16. Site 1 Nearby Permit Activity



Source: Clark County GIS 2014

2.3 Agricultural Land Classification Criteria Analysis

GMA requires protection of agricultural, forest, and mineral lands of long-term commercial significance. GMA provides guidelines for classification of resource lands in RCW 36.70A.050, and the Washington State Department of Commerce further defines them in Chapter 365-190 WAC. If Site 1 or other sites under consideration for RILB designation are redesignated as RILB’s and rezoned to Light Industrial (IL), the County would consider the degree to which the lands satisfy the agricultural land classification criteria and ultimately balance GMA goals addressing resource lands and economic development.

This section presents a matrix analysis of how Site 1 and the Areawide Study Area compare to the minimum guidelines to classify agricultural lands in WAC 365-190-050. The matrix in Exhibit 17 compares Site 1 and Areawide Study Area results to the County’s 2007 analysis addressing a similar geographic boundary⁴. A summary of the analysis in the matrix is provided in Section 2.4.

Exhibit 17. Matrix: Site 1 and Areawide Study Area Agricultural Land Classification Criteria Analysis

	<u>WAC 365-190-050 Criteria</u>	2007 Analysis: Site 1	2015 Analysis: Site 1	2015 Analysis: Areawide Study Area surrounding Site 1
A.	(1) In classifying and designating agricultural resource lands, counties must approach the effort as a county-wide or area-wide process. Counties and cities should not review resource lands designations solely on a parcel-by-parcel process. Counties and cities must have a program for the transfer or purchase of development rights prior to designating agricultural resource lands in urban growth areas. Cities are encouraged to coordinate their agricultural resource lands designations with their county and any adjacent jurisdictions.	Conducted as part of Comprehensive Plan Update in 2007.	Areawide analysis is being prepared for four RILB inventory sites including Site 1, Ackerland and Lagler. See right.	The areawide study area includes Agriculture (Ag) designations between the UGAs of Battleground and Vancouver, including areas abutting Site 1 and generally continuing north, east, south and west until another non-Ag zone designation abuts, or until the contiguous Ag pattern changes (such as to the east where the Ag area is split by Rural designations or takes access from other roads). See Section 2.2.
B.	2) Once lands are designated, counties and cities planning under the act must adopt development regulations that assure the conservation of agricultural	The County has adopted development regulations to conserve agricultural resource lands.	The County has adopted development regulations to conserve agricultural resource lands.	The County has adopted development regulations to conserve agricultural resource lands.

⁴ The 2007 Analysis is documented in a May 21, 2007 memo and attachments prepared by Clark County Community Planning, entitled “Bringing Resource Lands into UGAs,” and directed to the Board of County Commissioners and Clark County Planning Commission. Available: <http://www.clark.wa.gov/planning/RuralLands/taskforce.html>. Accessed: October 2014.

	<u>WAC 365-190-050 Criteria</u>	2007 Analysis: Site 1	2015 Analysis: Site 1	2015 Analysis: Areawide Study Area surrounding Site 1
	resource lands. Recommendations for those regulations are found in WAC 365-196-815.			
C.	(3) Lands should be considered for designation as agricultural resource lands based on three factors:			
D.	(a) The land is not already characterized by urban growth. To evaluate this factor, counties and cities should use the criteria contained in WAC 365-196-310.	<ul style="list-style-type: none"> • The 35 parcels range in size from 0.19-222 acres. • Water lines are located within the sub area boundaries. • No sewer lines within the sub area. • Sub area is within urban reserve overlay. • Surrounded by Urban Reserve zoning. 	The Site 1 study area parcels range from 0.26 to 100 acres or greater with two at 100 acres or greater. The parcels are in agricultural or rural residential use. There are agricultural buildings with a dairy operation east of SR 503. See Exhibit 7.	The Ackerland and Lagler properties are the largest properties in the study area. Other sites are 0.26-1 acre, 5-20 acres and 20-75 acres in size. See Exhibit 7.
E.	(b) The land is used or capable of being used for agricultural production. This factor evaluates whether lands are well suited to agricultural use based primarily on their physical and geographic characteristics. Some agricultural operations are less dependent on soil quality than others, including some livestock production operations.	<p>IN COMMERCIAL PRODUCTION?</p> <ul style="list-style-type: none"> • 3 farms are located within the sub area as identified in the Globalwise report maps • 84% in ag/farm current use program <p>CAPABLE?</p> <ul style="list-style-type: none"> • 79% prime ag soils • 66.41% critical land • hydric soils, wetland, priority species buffer 	<p>The Lagler property is primarily in use as a dairy. The Ackerland property is used for hay production.</p> <p>NRCS soil data show most of the land in the study area is capable of production (see land capability ratings below); some is considered to have limitations depending on whether the land is drained or due to other limiting factors. See Exhibit 11 and Appendix A.</p> <p>The eastern portion of the Lagler property is in Drainage District 5. The Lagler property is largely in the China Ditch sub-watershed and the Ackerland property is largely within the Salmon Creek watershed. See Exhibit 12.</p> <p>The pastures and fields of Site 1 are extensively managed to control surface water through drain tile in certain parcels (per description provided by property owner) and maintenance of the District 5</p>	<p>Much of the study area is in current use taxation for agriculture; see Exhibit 8. The NRCS soil data show most of the land in the study area is considered prime farmland soil and (see land capability rating below) and capable of production with some limitations as described for Site 1. See Exhibit 11.</p> <p>East of SR 503, some of the land is in Drainage District 5 and mostly in the China Ditch sub-watershed. West of SR 503, the study area is within the Salmon Creek and Curtain Creek watersheds. See Exhibit 12.</p> <p>Similar to Site 1, it is anticipated that much of the land non-irrigated and is drained. A student research paper</p>

	WAC 365-190-050 Criteria	2007 Analysis: Site 1	2015 Analysis: Site 1	2015 Analysis: Areawide Study Area surrounding Site 1
			drainage system on the eastern property. (Anchor QEA February 2015) See Appendix B.	addressing a Lacamas Lake Watershed Research Project indicated that the China Ditch sub-basin contains fields and pasture that have manmade channels to drain wetlands for agricultural use, and that the marshy land is not suited for urban development. ⁵
F.	(i) Lands that are currently used for agricultural production and lands that are capable of such use must be evaluated for designation. The intent of a landowner to use land for agriculture or to cease such use is not the controlling factor in determining if land is used or capable of being used for agricultural production. Land enrolled in federal conservation reserve programs is recommended for designation based on previous agricultural use, management requirements, and potential for reuse as agricultural land.	See 3(b) above. Three farms in production noted.	The property is used for agriculture as indicated in docket application materials, aerial photos, and Assessor land use codes. Based on United States Department of Agriculture (USDA) Crop Scape data ⁶ , the Lagler property east of SR 503 is shown as in Alfalfa production, and the Ackerland property west of SR 503 is mapped as growing oats and wheat. See Exhibit 14.	Based on current use taxation records it appears that much of the land is used for agriculture, though some for residential, school, or golf course uses. The USDA Crop Scape data indicates Alfalfa, hay, caneberries, ⁷ and barley are being grown in the study area, but a large part of the area is in grass/pasture, and non-Agriculture. See Exhibit 14. A local farmer in Brush Prairie notes the USDA Crop Scape Data illustrates caneberries are grown in the vicinity of the site. (pers com Hunter, October 19, 2015) ⁸ In any case, much of the study area is used for agriculture.

⁵ Beam, Cheryl. November 30, 2004. Lacamas Lake Watershed Research Project. Available: <http://beamers1.home.comcast.net/~beamers1/LacamasLakeWatershed.pdf>.

³ The USDA, NASS Cropland Data Layer (CDL) is a raster, geo-referenced, crop-specific land cover data layer. The 2014 CDL has a ground resolution of 30 meters. The CDL is produced using satellite imagery collected during the current growing season. No farmer reported data are derivable from the Cropland Data Layer.

⁷ Terminology corrected in responses to comments January 2016.

⁸ Letter to Clark County Community Planning, October 19, 2015, from Jim Hunter. Hunters' Greens Farm, Brush Prairie.

	<u>WAC 365-190-050 Criteria</u>	2007 Analysis: Site 1	2015 Analysis: Site 1	2015 Analysis: Areawide Study Area surrounding Site 1																																				
G.	(ii) In determining whether lands are used or capable of being used for agricultural production, counties and cities shall use the land-capability classification system of the United States Department of Agriculture Natural Resources Conservation Service as defined in relevant Field Office Technical Guides. These eight classes are incorporated by the United States Department of Agriculture into map units described in published soil surveys, and are based on the growing capacity, productivity and soil composition of the land	Prime farmland classes considered. Land capability class appears not to have been addressed.	<p>The study area contains non-irrigated Class 1, 2, and 3 farmland soils with some Class 6 soils. See Exhibit 11. According to the NRCS, capability levels are high or moderate for Class 1 and 2 soils and limited for Class 3, and in particular Class 6:</p> <table border="0" style="margin-left: 20px;"> <tr><td>Class 1</td><td style="text-align: right;">39%</td></tr> <tr><td>Class 2</td><td style="text-align: right;">9%</td></tr> <tr><td>Class 3</td><td style="text-align: right;">28%</td></tr> <tr><td>Class 4</td><td style="text-align: right;">0%</td></tr> <tr><td>Class 5</td><td style="text-align: right;">0%</td></tr> <tr><td>Class 6</td><td style="text-align: right;">22%</td></tr> <tr><td>Class 7</td><td style="text-align: right;">0%</td></tr> <tr><td>Water</td><td style="text-align: right;">1%</td></tr> <tr><td>Total</td><td style="text-align: right;">100%</td></tr> </table> <p>Class 1 soils have few limitations that restrict their use.</p> <p>Class 2 soils have moderate limitations that reduce the choice of plants or that require moderate conservation practices.</p> <p>Class 3 soils have severe limitations that reduce the choice of plants or that require special conservation practices, or both.</p> <p>Class 6 soils have severe limitations that make them generally unsuitable for cultivation and that restrict their use mainly to pasture, rangeland, forestland, or wildlife habitat.</p>	Class 1	39%	Class 2	9%	Class 3	28%	Class 4	0%	Class 5	0%	Class 6	22%	Class 7	0%	Water	1%	Total	100%	<p>The areawide information shows that the area contains non-irrigated Class 1, 2, 3, 4, 6, and 7 soils. See Exhibit 11. Capability levels are high or moderate for Class 1 and 2 soils and limited for Class 3, and more limited for categories 4, 6, and 7.</p> <table border="0" style="margin-left: 20px;"> <tr><td>Class 1</td><td style="text-align: right;">18%</td></tr> <tr><td>Class 2</td><td style="text-align: right;">15%</td></tr> <tr><td>Class 3</td><td style="text-align: right;">38%</td></tr> <tr><td>Class 4</td><td style="text-align: right;">0.1%</td></tr> <tr><td>Class 5</td><td style="text-align: right;">0%</td></tr> <tr><td>Class 6</td><td style="text-align: right;">28%</td></tr> <tr><td>Class 7</td><td style="text-align: right;">0.1%</td></tr> <tr><td>Water</td><td style="text-align: right;">0%</td></tr> <tr><td>Total</td><td style="text-align: right;">100.0%</td></tr> </table> <p>Classes not described at left are:</p> <p>Class 4 soils have very severe limitations that reduce the choice of plants or that require very careful management, or both.</p> <p>Class 7 soils have very severe limitations that make them unsuitable for cultivation and that restrict their use mainly to grazing, forestland, or wildlife habitat.</p>	Class 1	18%	Class 2	15%	Class 3	38%	Class 4	0.1%	Class 5	0%	Class 6	28%	Class 7	0.1%	Water	0%	Total	100.0%
Class 1	39%																																							
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Water	0%																																							
Total	100.0%																																							
H.	(c) The land has long-term commercial significance for agriculture. In determining this factor, counties and cities should consider the following nonexclusive criteria, as applicable:																																							

	<u>WAC 365-190-050 Criteria</u>	2007 Analysis: Site 1	2015 Analysis: Site 1	2015 Analysis: Areawide Study Area surrounding Site 1
I.	(i) The classification of prime and unique farmland soils as mapped by the Natural Resources Conservation Service;	79% prime ag soils	About 76% of site soils are considered prime farmland. A portion (23%) is prime farmland if drained. The site is drained by ditches and tiles (see Appendix B). Therefore up to 99% of the soils are considered as prime farmland. See Appendix A.	About 67% of soils are considered prime farmland. A portion (22%) are considered prime farmland if drained. Therefore between 67-89% of soils are considered prime farmland. See Appendix A.
J.	(ii) The availability of public facilities, including roads used in transporting agricultural products	Water lines are located within the sub area boundaries. Education facilities adjacent. Airport adjacent. The sub area is split by SR 503.	SR 503 splits the two properties under consideration. It is a designated freight route and an arterial. See Exhibit 9. SR 503 average daily traffic northbound at NE 119 th Street at the southern property boundary carries: 13,959 ADT (2012). Southbound SR 503 at 19 th Street carries 14,015 ADT (2012). The state route carries urban traffic, and is not a rural road used primarily for the transport of agricultural products. WSDOT has indicated a concern about adding no new traffic signals between NE 119 th and NE 159 th Streets along SR 503. There is a small airport landing strip north of the Lagler property. There are adjacent education facilities near the Ackerland property. Water lines run along SR 503 and NE 119 th and NE 149 ^h Street and serve the properties. Sewer is located in the UGA south of the sites around NE 119 th Street.	The analysis is similar as for Site 1 by itself. Water lines traverse the area. Sewer lines are closest located south of the area in the Vancouver UGA and along SR 503 in proximity to the Lagler Property. SR 503 serves as an arterial and freight route.
K.	(iii) Tax status, including whether lands are enrolled under the current use tax assessment under chapter 84.34 RCW and whether the optional public benefit rating system is used locally, and whether there is the ability to purchase or transfer land development rights;	84.01% in ag/farm current use program	All of the subject property is in the agricultural current use taxation program. See Exhibit 8.	Most of the properties in the study area are in current use taxation. See Exhibit 8.

	WAC 365-190-050 Criteria	2007 Analysis: Site 1	2015 Analysis: Site 1	2015 Analysis: Areawide Study Area surrounding Site 1
L.	(iv) The availability of public services;	See ii above	<p>The property north of the Lagler site east of SR 503 is zoned as Airport and is privately owned. The property is called the Brush Prairie Aerodrome and allows usage by 10 single engine aircraft.⁹</p> <p>Summit View High School lies north of the Ackerland property west of SR 503. Laurin Middle School and Glennwood Heights Elementary school are southwest of the Ackerland property.</p> <p>Fire protection is provided by Fire District 3 for the vast majority of the property. The southwest portion of the Ackerland property is in Fire District 5.</p> <p>Law enforcement is provided by the Clark County Sheriff, from the Central Precinct at 505 NW 179th Street Ridgefield, WA 98642.</p> <p>The eastern portion of the Lagler property is in Drainage District 5.</p>	<p>Airport: See Site 1 information.</p> <p>Schools: Laurin Middle School and Glennwood Heights Elementary school are in the study area boundary. Summit View High School lies north of the Ackerland property west of SR 503.</p> <p>Fire protection: Fire Protection District 3 services areas east of SR 503 and most of the Ackerland property and some adjacent areas west of SR 503. Fire District 5 serves most of the area west of SR 503.</p> <p>Sheriff: Same as for Site 1.</p>
M.	(v) Relationship or proximity to urban growth areas;	Southern tip of sub area boundary borders Vancouver’s northern UGA boundary	The site is connected to the Vancouver UGA on the south. See Exhibit 6.	The area is between the UGAs of Battleground and Vancouver but lies closer to the Vancouver UGA and its infrastructure and services.
N.	(vi) Predominant parcel size;	Range 0.19- 222.16 acres Median parcel size: 22.42 acres	The property contains parcels of just less than 0.26 acres to more than 100 acres. See Exhibit 7.	The Ackerland and Lagler properties are the largest properties in the study area. Other sites are 0.26 - 1 acre, 5-20 acres and 20-75 acres in size. See Exhibit 7.

⁹ AirNav.com. 2015. Brush Prairie Aerodrome. Available: <http://www.airnav.com/airport/5WA9>.

	<u>WAC 365-190-050 Criteria</u>	2007 Analysis: Site 1	2015 Analysis: Site 1	2015 Analysis: Areawide Study Area surrounding Site 1
O.	(vii) Land use settlement patterns and their compatibility with agricultural practices;	The land within the sub area boundary is characterized by rural land uses (open fields, farms, rural residential) Farms are classified as: Livestock/Dairy; Vegetable/Fruit; and Specialty.	The property is generally open in character, except for the dairy buildings and some homes. UGA territory is to the south and commercial and residential uses have been developed. Permit activity shows both commercial and residential permits. See Exhibit 16.	Agricultural structures and agricultural land extend through most of the study area. There are residential uses on the agricultural properties and pockets of residential neighborhoods such as to the east of the Lagler site. Southwest of the Ackerland site in the study area is the Glennwood Heights Elementary School and Laurin Middle School. Southeast of the Lagler site in the study area is Hartwood Golf Course.
P.	(viii) Intensity of nearby land uses;	Surrounding area is comprised of open space, rural residential (R-5 zone) and there is a Rural Center to the North. Urban Holding overlay was recently lifted on parcels to the south of sub area.	Residential density south of NE 119 th Street ranges from 5-10 units per acre, 10-20 units per acre, and 20+ units per acre. See Exhibit 15.	Same as for Site 1 south of the study area. Within the study area, the densities range with some lots closer to urban densities (0.26 - 0.99 acre) and other rural in character (< 5 acres). Most lots have homes on them.
Q.	(ix) History of land development permits issued nearby;	150-unit condo project (Delyria) to south within UGA	Over time there have been a series of permit applications south of the sites along NE 119 th Street and north of NE 149 th Street. See Exhibit 16.	Same as for Site 1. The permit applications have been more prevalent in areas encircling the study area in the Vancouver and Battleground UGAs. There have been some permits in the study area such as at the Golf Course or sites along the arterials near Ackerland.
R.	(x) Land values under alternative uses; and	AG-20: \$16/acre Proposed zoning: Light Industrial: \$127/acre	Land values for non-agricultural uses of the Lagler and Ackerland properties are significantly greater than for agricultural uses. The 2014 market value of the Lagler land east of SR 503, according to the Assessor, is \$1,490,797.00. With buildings, the value is \$2,268,396.00. Due to the current use assessment the property is being taxed at a lower rate than its market value at \$885,058.00. The land value under market conditions is significantly higher.	Similar results as for Site 1 as most of the properties are in current use taxation.

	WAC 365-190-050 Criteria	2007 Analysis: Site 1	2015 Analysis: Site 1	2015 Analysis: Areawide Study Area surrounding Site 1
			<p>The 2014 market value of the Ackerland land west of SR 503 is \$2,074,436.00. With buildings, the value is \$2,219,692.00. The property is taxed at a value of \$307,031.00 given its current use assessment. The land value under market conditions is significantly higher.</p> <p>If the docket study area were used for light industrial purposes rather than rural purposes, it is likely the value of the land would be higher than the difference already seen between the assessed value and market value.</p>	
S.	(xi) Proximity to markets.	In close proximity to Vancouver UGA market.	Vancouver is the primary market for local food. However, the Lagler dairy provides its milk products to the Tilamook Cooperative. The Ackerland property provides hay/silage for animal feed to the Lagler dairy.	Vancouver is the primary market for local food.
T.	(4) When designating agricultural resource lands, counties and cities may consider food security issues, which may include providing local food supplies for food banks, schools and institutions, vocational training opportunities in agricultural operations, and preserving heritage or artisanal foods.		<p>In Clark County the number of small farms has been increasing over time, and represents more intensive, value-added, urban-oriented farming.¹²</p> <p>As described above, the Lagler dairy does not sell its product locally. Other small operators in the County do, such as:</p> <ul style="list-style-type: none"> • Dobler Hill Dairy, LLC, Woodland • Spanish Sunrise Dairy, Yacolt • Vantol Dairy, La Center¹⁰ <p>See also Site 4 analysis.</p> <p>The Clark County Food System Council addresses food security in the County and is promoting the use of</p>	Similar analysis as for Site 1. In Clark County the number of large and medium size farms has been declining and small farms has been increasing over time, and represent more intensive, value-added, urban-oriented farming. ¹²

¹⁰ Washington State University (WSU) Extension Farm and Crop Locator: http://smallfarms.wsu.edu/farms/search_result.asp.

¹² BERK. 2012. Clark County Rural Lands Study. Available: <http://www.clark.wa.gov/planning/rurallands/index.html>.

	WAC 365-190-050 Criteria	2007 Analysis: Site 1	2015 Analysis: Site 1	2015 Analysis: Areawide Study Area surrounding Site 1															
			locally grown food for the emergency food system, supporting the trend of urban farming, the availability of locally grown food in local stores, as well as promoting agricultural activity and production across the county. ¹¹																
U.	(5) When applying the criteria in subsection (3)(c) of this section, the process should result in designating an amount of agricultural resource lands sufficient to maintain and enhance the economic viability of the agricultural industry in the county over the long term; and to retain supporting agricultural businesses, such as processors, farm suppliers, and equipment maintenance and repair facilities.		<p>The number of farms across the County increased between 1997 and 2012, but between 2007 and 2012 had a slight decline:</p> <table border="1" data-bbox="1010 548 1539 781"> <thead> <tr> <th></th> <th>1997</th> <th>2002</th> <th>2007</th> <th>2012</th> </tr> </thead> <tbody> <tr> <td>Total Farms with Sales - Specified Products</td> <td>1,124</td> <td>1,651</td> <td>2,283</td> <td>2,058</td> </tr> <tr> <td>Total Farms with Sales Not Specified</td> <td>1,765</td> <td>1,596</td> <td>2,101</td> <td>1,929</td> </tr> </tbody> </table> <p>The number of dairies in the County has steadily decreased in the county according to the US Census of Agriculture. Between 1997 and 2012 the number of dairies went from 32 to 9; the most recent decline went from 25 in 2002 and 2007 to 9 in 2012.</p> <p>Hay and forage land represents the top cropland in acres in the County, 17,541 acres of 74,758 acres in farms. The number of farms with crops and hay shows an increase between 2002 and 2007 and a more recent decline in 2012:</p>		1997	2002	2007	2012	Total Farms with Sales - Specified Products	1,124	1,651	2,283	2,058	Total Farms with Sales Not Specified	1,765	1,596	2,101	1,929	<p>Similar analysis regarding economic viability as for Site 1.</p> <p>The Docket Site 1 consists of about 602 acres. This is about 19% of the areawide acreage of 3,196.</p> <p>If Site 1 were removed from the AG-20 designation most of the study area would remain in AG-20 zoning. The area west of SR 503 would be more isolated from the AG-20 areas east of SR 503.</p> <p>However, there is no known interdependence among the agricultural businesses as there is between the Ackerland and Lagler sites (Ackerland site provides feed and pasture for Lagler dairy)_based on information from Clark County WSU Extension staff. ¹⁸</p> <p>A local farmer in Brush Prairie has observed that there is informal sharing of equipment between the Lagler operation and other operations in Brush</p>
	1997	2002	2007	2012															
Total Farms with Sales - Specified Products	1,124	1,651	2,283	2,058															
Total Farms with Sales Not Specified	1,765	1,596	2,101	1,929															

¹¹ Clark County Food System Council. 2013. Policy Roadmap for Clark County’s Food System: Strategies for Change October 2013-14. Available: <http://www.clark.wa.gov/public-health/about/documents/RoadmapWorkPlan2013-14.pdf>.

¹⁸ Personal communication, Doug Stienbarger, County Director, Faculty, Community & Economic Development, WSU Clark County Extension. February 17, 2015. Email to Lisa Grueter, Manager, BERK Consulting.

WAC 365-190-050 Criteria	2007 Analysis: Site 1	2015 Analysis: Site 1	2015 Analysis: Areawide Study Area surrounding Site 1										
		<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th style="text-align: center;">1997</th> <th style="text-align: center;">2002</th> <th style="text-align: center;">2007</th> <th style="text-align: center;">2012</th> </tr> </thead> <tbody> <tr> <td>Crops & Hay</td> <td style="text-align: center;">Not available</td> <td style="text-align: center;">284</td> <td style="text-align: center;">429</td> <td style="text-align: center;">368</td> </tr> </tbody> </table> <p>Regarding trends of agriculture across the County, findings of the Rural Lands Study¹³ included:</p> <p>Key Finding #1: Agriculture in Clark County in 2011 is in the midst of a decade’s long transition from large scale commodity farming into more intensive, value-added, urban-oriented farming.</p> <p>Key Finding #2: Large farm and mid-size farms are declining in number, acres, and value. However, they remain a viable enterprise but face a multitude of challenges.</p> <p>Key Finding #3: A diverse set of small farms and enterprises are increasingly becoming part of the rural landscape.</p> <p>The findings show the number of farms has been increasing (e.g. 2002-2007) but has been experiencing a decline in average size and are becoming more urban oriented.</p> <p>Based on the Rural Lands Study¹³, there has been a “decline in the number of commercial and mid-sized farms in Clark County between 1997 and 2007, and presumably through 2012 (relayed anecdotally from key informants).” The long-term outlook for larger farms in Clark County is in transition due to water rights, labor, and access farm supportive services: “Consolidation in some sectors of the agricultural industry is taking crop production out of the State</p>		1997	2002	2007	2012	Crops & Hay	Not available	284	429	368	<p>Prairie such as Silver Star. (pers com Hunter, October 19, 2015)-¹⁹</p> <p>Other equipment sharing may occur through informal means.</p> <p>The use of agricultural equipment offered by supporting commercial businesses serving the Clark County may be an alternative.</p>
	1997	2002	2007	2012									
Crops & Hay	Not available	284	429	368									

¹³ BERK. 2012. Clark County Rural Lands Study. Available: <http://www.clark.wa.gov/planning/rurallands/index.html>.

¹⁹ Letter to Clark County Community Planning, October 19, 2015, from Jim Hunter. Hunters’ Greens Farm, Brush Prairie.

	WAC 365-190-050 Criteria	2007 Analysis: Site 1	2015 Analysis: Site 1	2015 Analysis: Areawide Study Area surrounding Site 1
			<p>(and occasionally out of the country). Increasing labor costs and uncertainty (due to federal immigration policies) make labor intensive crop production unattractive to many commercial farms.”¹³</p> <p>The 2012 Rural Lands Study indicated that milk production was experiencing some stability due to milk prices: “There is some sense that certain agricultural products—particularly those that are established and are not labor intensive—have a future in the county. Milk products provide the greatest share of commodity totals in Clark County and the number of milk-producing farms has stayed constant between 2002 and 2007, while experiencing modest growth in output due to rebound in commodity value of milk. Some farmers also mentioned that demand is not currently being met in this commodity area.”¹⁴</p> <p>It should be noted that the Rural Lands Study did not have access to the 2012 Census of Agriculture results at the time. Though the number of dairies was at 25 in both the 2002 and 2007 Census reports, dairies have since been reduced to 9 according to the 2012 Census of Agriculture.</p> <p>The value of milk production from cows in 2012 is \$14.5 million out of the total value of all agricultural products at \$50.9 million. Presently, milk production is a relatively large share in the total value of agricultural products, though the long-term trends of large and mid-size farms is one of decline.</p> <p>Reasons for the decline in dairies may include: The cost of running a smaller dairy has increased, as have</p>	

¹⁴ BERK. 2012. Clark County Rural Lands Study. Available: <http://www.clark.wa.gov/planning/rurallands/index.html>.

	WAC 365-190-050 Criteria	2007 Analysis: Site 1	2015 Analysis: Site 1	2015 Analysis: Areawide Study Area surrounding Site 1
			<p>regulatory requirements such as water quality. Lower land prices, lower rainfall, and the efficiencies gained with a larger operation and management have led many dairies to move from Western Washington to Eastern Washington.^{15 16} Further the cost of expanding a dairy or starting a dairy is higher in Clark County and Western Washington. Even if there is current use taxation, the cost to purchase the land is based on market value. This is especially true for a dairy farm which requires a larger land base to handle nutrient application from the manure generated. Waste management costs on the west (wet) side of the mountains increase with the relatively plentiful rain (increases the material needed to spread; limits times of year material can be spread due to environmental concerns, etc.). Given the cost of starting from scratch, the other strategy is to acquire a dairy in transition. Since many farmers use their farm as their “retirement plan”, the cost remains prohibitive. While dairy farmers probably average in their 60’s, their heirs may be not interested in taking over the operation and the property would be sold.¹⁷</p>	

¹⁵ Dairy Herd News Source. January 17, 2011. Washington dairies moving to eastern part of state. <http://www.dairyherd.com/dairy-news/latest/washington-dairies-moving-to-eastern-part-of-state-113939604.html>.

¹⁶ Emailed WSU Extension and Clark Conservation Districts to discuss. Pending response.

¹⁷ Personal communication, Doug Stienbarger, County Director, Faculty, Community & Economic Development, WSU Clark County Extension. February 17, 2015. Email to Lisa Grueter, Manager, BERK Consulting.

	<u>WAC 365-190-050 Criteria</u>	2007 Analysis: Site 1	2015 Analysis: Site 1	2015 Analysis: Areawide Study Area surrounding Site 1
V.	<p>(6) Counties and cities may further classify additional agricultural lands of local importance. Classifying additional agricultural lands of local importance should include, in addition to general public involvement, consultation with the board of the local conservation district and the local committee of the farm service agency. It may also be useful to consult with any existing local organizations marketing or using local produce, including the boards of local farmers markets, school districts, other large institutions, such as hospitals, correctional facilities, or existing food cooperatives.</p> <p>These additional lands may include designated critical areas, such as bogs used to grow cranberries or farmed wetlands. Where these lands are also designated critical areas, counties and cities planning under the act must weigh the compatibility of adjacent land uses and development with the continuing need to protect the functions and values of critical areas and ecosystems.</p>	<p>The County has not designated agricultural land of local importance. This is an optional policy choice.</p>	<p>The County has not designated agricultural land of local importance. This is an optional policy choice.</p>	<p>Same as for Site 1.</p>

2.4 Summary and Conclusions

Site 1

The Site 1 Ackerland and Lagler properties are zoned and used for agriculture and contain a majority of prime farmland soils. The type of farm operations is large in the County's range of agricultural properties. The long-term trend is of decline in large and mid-size operations, and rather an increase in small farms oriented to the urban, local food movement.

The agricultural market is showing an increase in small value added production and direct sales, community supported agriculture (CSAs), and other newer local food trends. The subject properties are not part of the local food system. Larger and mid-size farms by contrast have been ceasing operations as they are consolidated or moved to other areas of the state or country where such operations can be more profitably operated.

The subject sites are in proximity of urban uses at urban densities, with urban services including water and sewer. Schools are located in proximity to the sites. Fire protection is by special districts and police protection would remain with the Clark County Sheriff. There has been recent permit activity regarding commercial and residential uses to the south and north of the sites. The volume of traffic on SR 503 is that of an urban arterial.

Subject sites are under current use taxation, and thus the effect of growth pressures is not felt fiscally. The value of the land under urban uses would be greater.

The RILB Inventory (BERK Consulting et al. September 2015, under separate cover) shows the property meets screening criteria to be considered a RILB.

Allowing the dairy to relocate to eastern Washington ensures continuation of the agricultural operation, rather than cessation and an underutilized parcel.

Areawide

Site 1 consists of about 602 acres. This is about 19% of the areawide acreage of 3,196. If Site 1 were removed from the AG-20 designation, about 80% of the areawide study area would remain in AG-20 zoning. The area west of SR 503 would be more isolated from the AG-20 areas east of SR 503. There is no known interdependence among the agricultural businesses as there is between the Ackerland and Lagler sites (Ackerland site provides feed and pasture for Lagler dairy) based on information from Clark County WSU Extension staff.²⁰

A local farmer in Brush Prairie has observed that there is informal sharing of equipment between the Lagler operation and other operations in Brush Prairie such as Silver Star. (pers com Hunter, October 19, 2015) Other equipment sharing may occur through informal means. The use of agricultural equipment offered by supporting commercial businesses serving the Clark County may be an alternative.²¹

Within the study area, the uses are typically agriculture but there are pockets of residential lots, educational and recreational uses.

The removal of the Site 1 properties from the areawide acreage would continue the decline in large and mid-size operations, and would remove some of the larger parcels in the County's AG-20 inventory. This

²⁰ Personal communication, Doug Stienbarger, County Director, Faculty, Community & Economic Development, WSU Clark County Extension. February 17, 2015. Email to Lisa Grueter, Manager, BERK Consulting.

²¹ Added in responses to comments in January 2016.

trend would likely continue with or without the Site 1 properties, and the trend towards small farms would likely continue.

As with Site 1, the areawide study area lies in proximity of urban uses at urban densities, with urban services including water and sewer, particularly from the Vancouver UGA. There are schools within the study area. Emergency services are provided by two fire districts and the Clark County Sheriff and these would continue in any case. There has been recent permit activity regarding commercial and residential uses encircling the study area. The volume of traffic on SR 503 is that of an urban arterial; other arterial border the study area.

Most of the area is in current use taxation, and it is likely the value of the land for urban uses would be higher than for the use under agriculture.

3.0 SITE 2 AND AREAWIDE STUDY AREA

3.1 Study Area Description

This evaluation addresses Site 2 and an area similarly designated and zoned surrounding Site 2 north of Ridgefield. See Exhibit 18.

Exhibit 18. Site 2 and Areawide Study Area Description

Description	Comments
Site 2: Ridgefield N	Site 2 is approximately 412 acres and lies north of the Ridgefield city limits along I-5.
Areawide Analysis: AG-20 Zoning in Vicinity of Site 2	The areawide study area includes Agriculture (Ag) designated land between the UGAs of LaCenter and Ridgefield, including areas abutting Site 2 and generally continuing north, east, south and west until another non-Ag designation abuts, or until I-5 is reached.

3.2 Maps Reviewed

A series of maps were reviewed as described in Exhibit 19 in order to conduct the Site 2 and Areawide analysis of agricultural land designation criteria in Section 3.3.

Exhibit 19. Maps Reviewed: Site 2 and Areawide Study Area

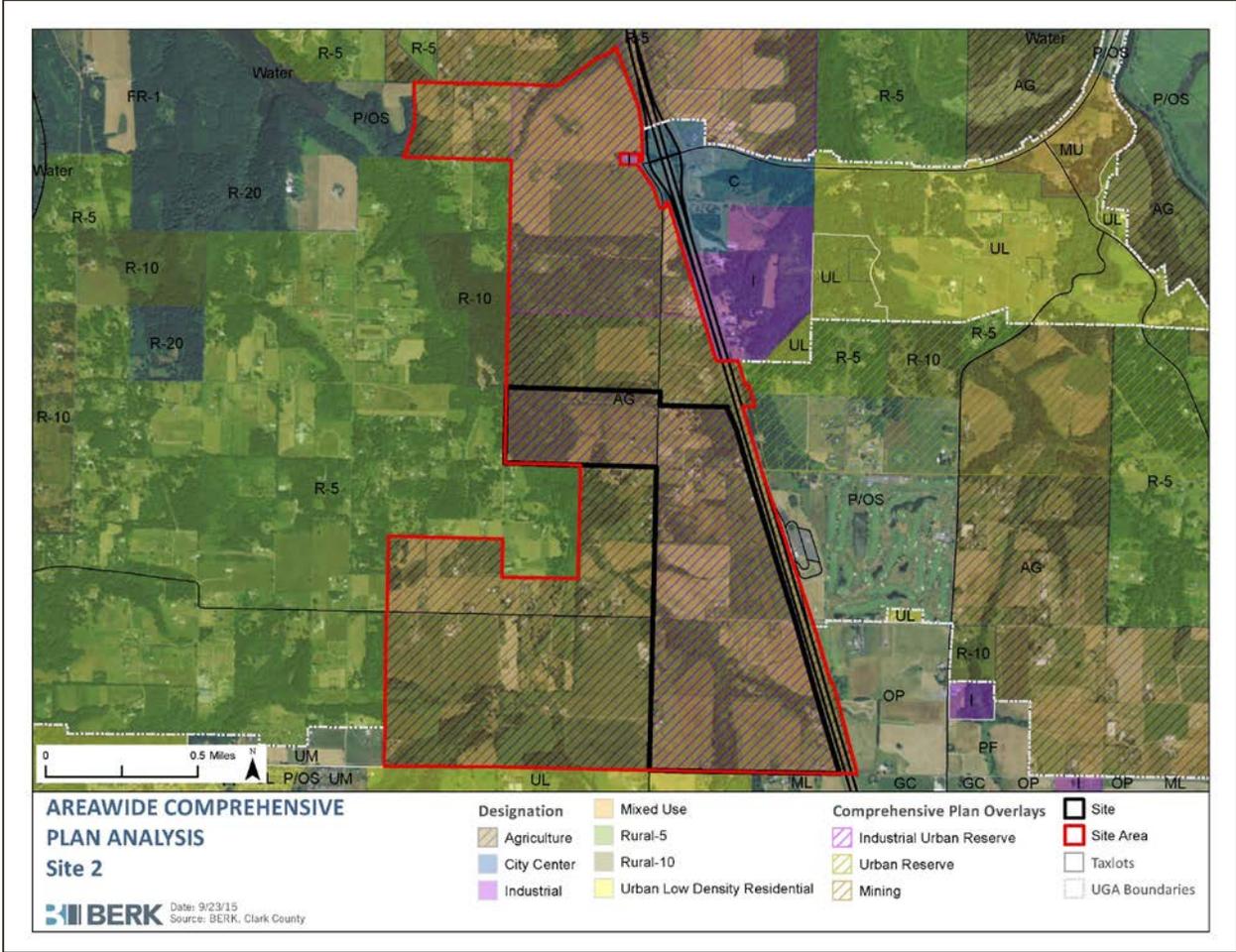
Maps	Comments
Comprehensive Plan	Site 2: Site of approximately 412 acres is fully in Industrial Urban Reserve with Agriculture designation. See Exhibit 20. Areawide: Agriculture with Industrial Urban Reserve Overlay. See Exhibit 20.
Zoning	Site 2: Agriculture-20 (AG-20). See Exhibit 22. Areawide: AG-20. See Exhibit 22.
Soils	Site 2: Gee silt loam, Odne silt loam, and Sara silt loam make up the majority of study area soils. About 34% of the area is prime farmland, 11% is prime farmland if drained, for a total of 45%. The rest is either farmland of statewide importance (21%) or not prime farmland (34%). Most soils are Class 3, 4 and 6. See Exhibit 25 and Appendix A. Areawide: Gee silt loam, Odne silt loam, Cove silty clay loam, and Sara silt loam make up most of the areawide soils. About 38% of the soils are prime farmland soils, 19% are prime farmland if drained, 13% are farmland of statewide importance, and 30% are not prime farmland. Most soils are Class 3, 4 and 6. See Exhibit 25 and Appendix A.

Maps	Comments
Topography	<p>Site 2: Nearly two-thirds of the site area has a slope between 0-8% per NRCS soil data. See Appendix A.</p> <p>Areawide: More than three-quarters of the study area has a slope between 0-8% per NRCS soil data. See Appendix A.</p>
Aerial photography	<p>Site 2: Most of the site is in agricultural use with open land, but there are single family and agricultural structures as well. See Exhibit 22.</p> <p>Areawide: Same as Site 2. See Exhibit 22.</p>
Current Use	<p>Site 2: Agriculture with large majority in current use taxation. A few small parcels in the southeast corner, north, and northeast corner are not in current use taxation. See Exhibit 22.</p> <p>Areawide: Agriculture with more than half of the study area in current use taxation, occurring mainly in the southern study area. See Exhibit 22.</p>
Parcel size	<p>Site 2: Variable, with roughly an even amount of small (1-5), medium (5-20) and large parcel sizes (20– 75) interspersed. See Exhibit 21.</p> <p>Areawide: Variable, with roughly more parcels that are between 5-20 acres in areas west and north of site. Larger parcels about 1-5. See Exhibit 21.</p>
Infrastructure: Roads, Sewer, Water	<p>Site 2: There is no water, sewer or freight infrastructure within the site area. I-5 is adjacent to the site area on its eastern border. Sewer and water lines also lie east of 1-5. See Exhibit 23.</p> <p>Areawide: Same as Site 2. See Exhibit 23.</p>
Floodplains	<p>Site 2: Not applicable.</p> <p>Areawide: Not applicable.</p>
Wetlands	<p>Site 2: There are wetlands (NWI) in the southern section of the site. See Exhibit 24.</p> <p>Areawide: There are some wetlands (NWI) in the southern region of the area to the west of the site. See Exhibit 24.</p>
Streams	<p>Site 2: There are riparian and non-riparian habitat conservation areas throughout the site. See Exhibit 24.</p> <p>Areawide: Same as Site 2. See Exhibit 24.</p>
Aquifer Recharge	<p>Site 2: The area is entirely in Category 2 Recharge Areas. See Exhibit 27.</p> <p>Areawide: Same as Site 2. See Exhibit 27.</p>
Geologic Hazards	<p>Site 2: Slopes of 8-20%, 20-30% and 30-50% are found in the study area, along NW 31st Avenue, and NW 289th and NW 299th Streets. Within these steep slope areas are potential areas of erosion and landslide hazard. There are typically very low liquefaction areas.</p> <p>Areawide: Same as Site 2.</p>

Site 2 and Areawide Maps

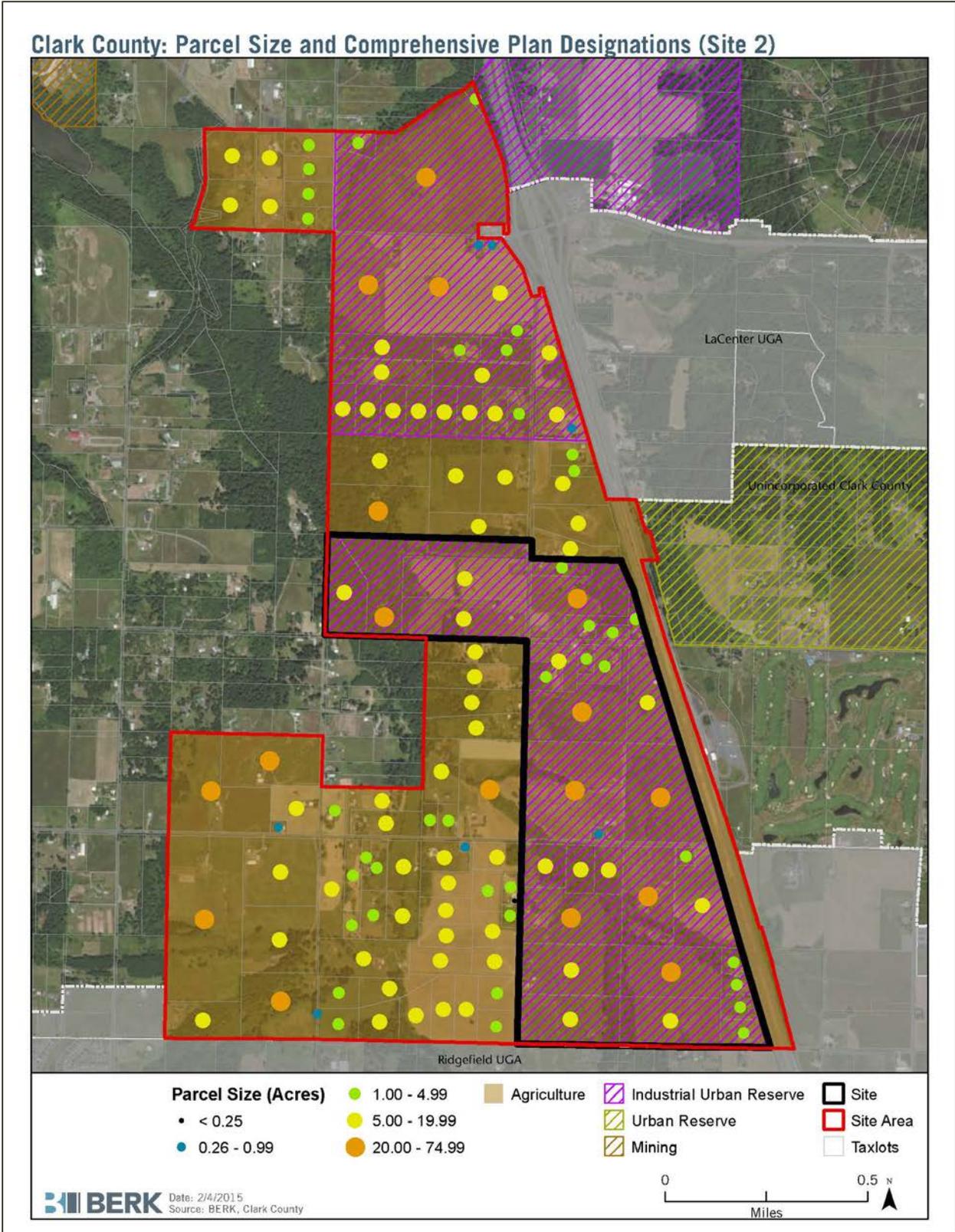
This Section presents maps specific to Site 2 as well as the Areawide Study Area regarding Comprehensive Plan designations, Zoning designations, parcel size, infrastructure, critical areas, soils and capability class, and other relevant topics. These maps are cross-referenced throughout the analysis.

Exhibit 20. Site 2 and Areawide Comprehensive Plan Designation



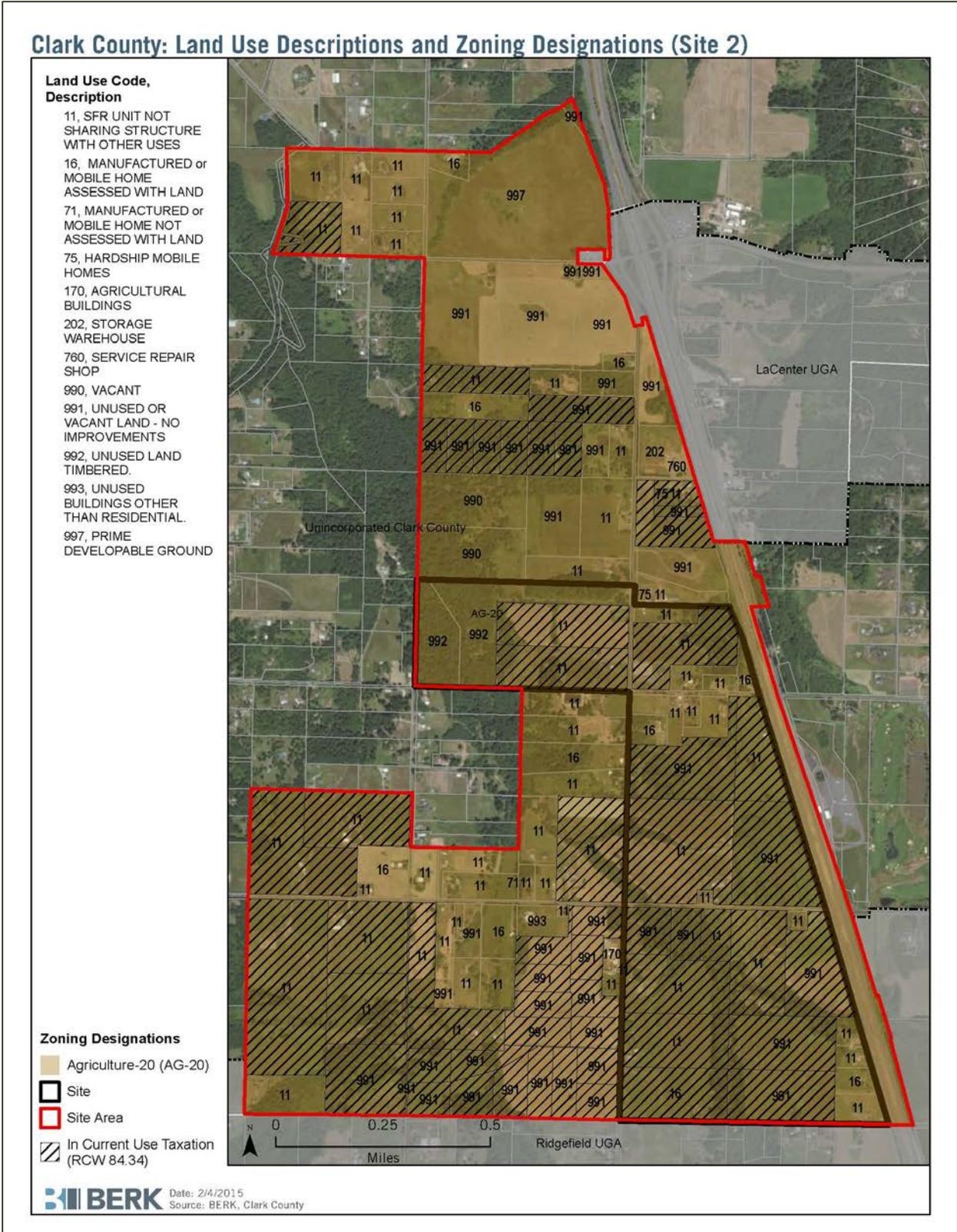
Source: Clark County GIS, BERK Consulting 2015

Exhibit 21. Site 2 and Areawide Comprehensive Plan Designation and Parcel Sizes



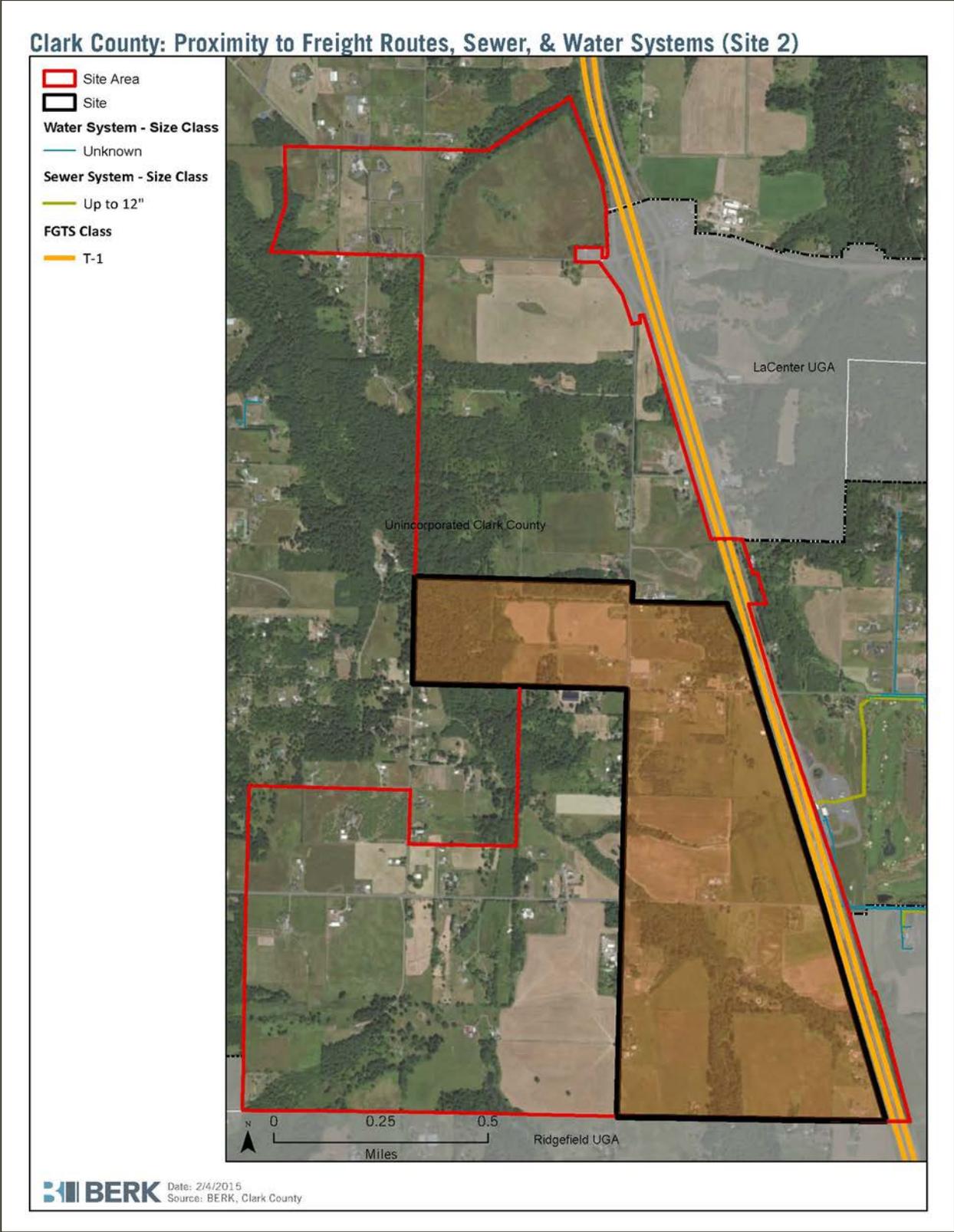
Source: Clark County GIS, BERK Consulting 2015

Exhibit 22. Site 2 and Areawide Current Land Uses and Zoning



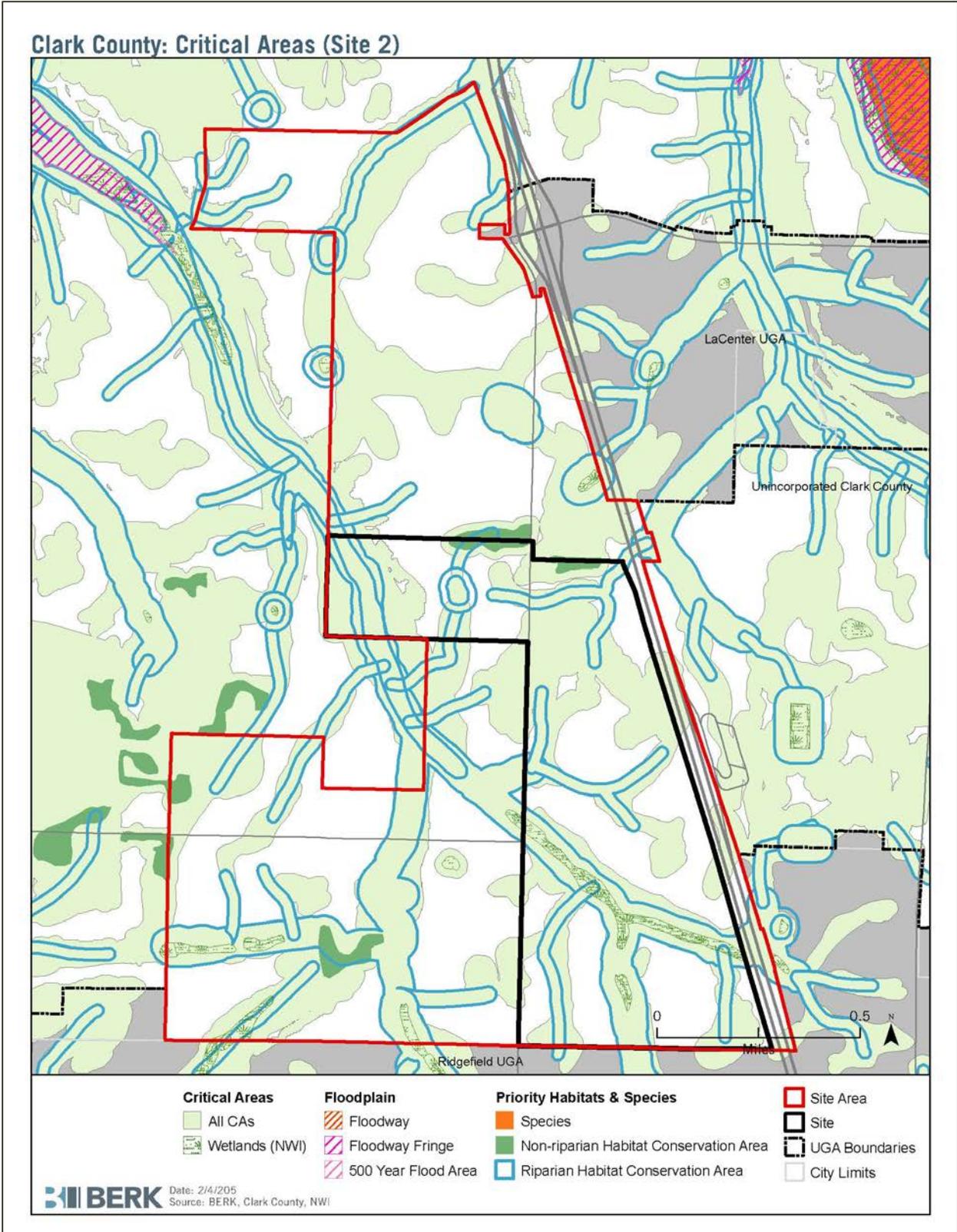
Source: Clark County GIS, BERK Consulting 2015

Exhibit 23. Site 2 and Areawide Proximity of Freight Routes, Water, and Sewer Facilities



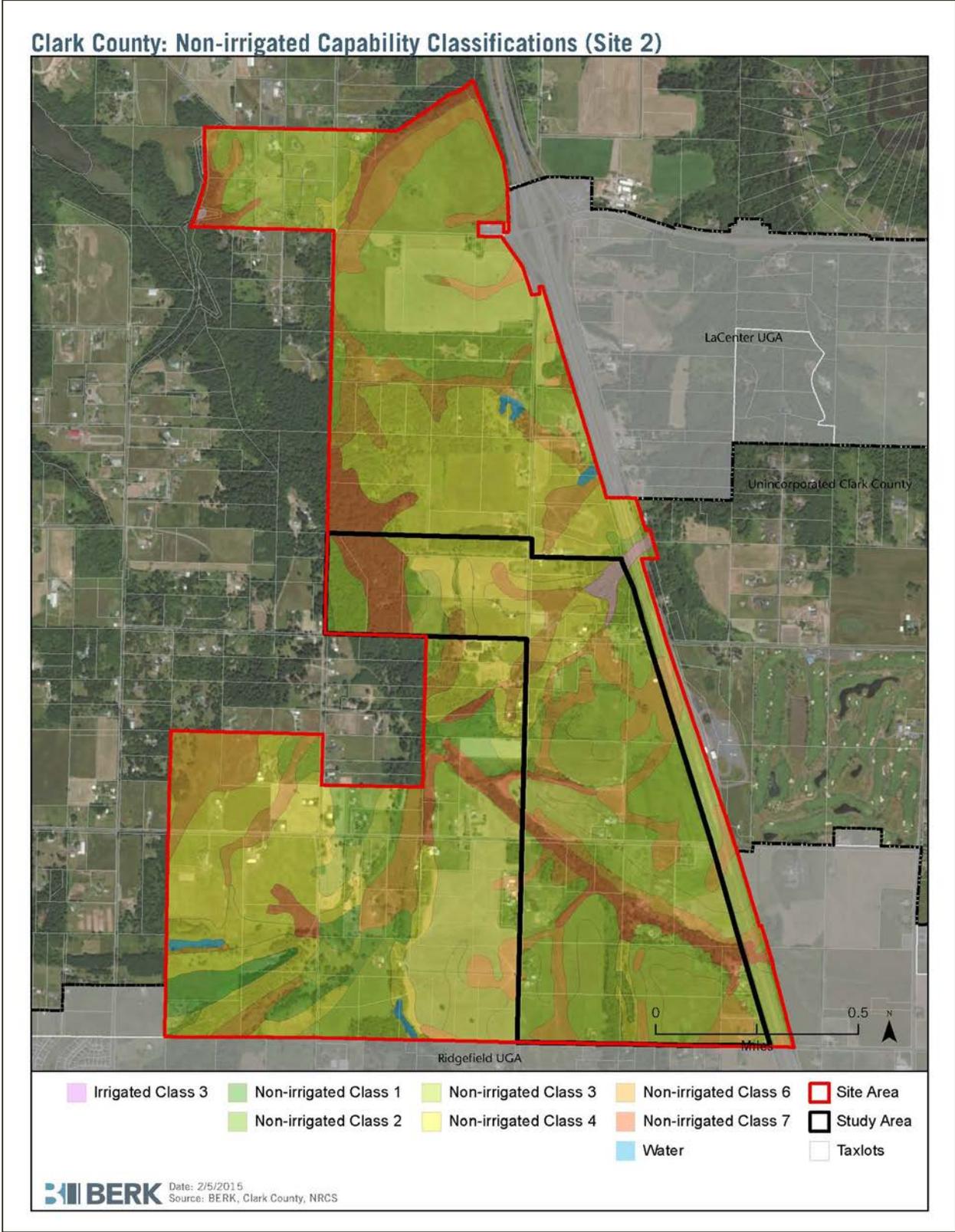
Source: Clark County GIS, BERK Consulting 2015

Exhibit 24. Site 2 and Areawide Mapped Presence of Critical Areas



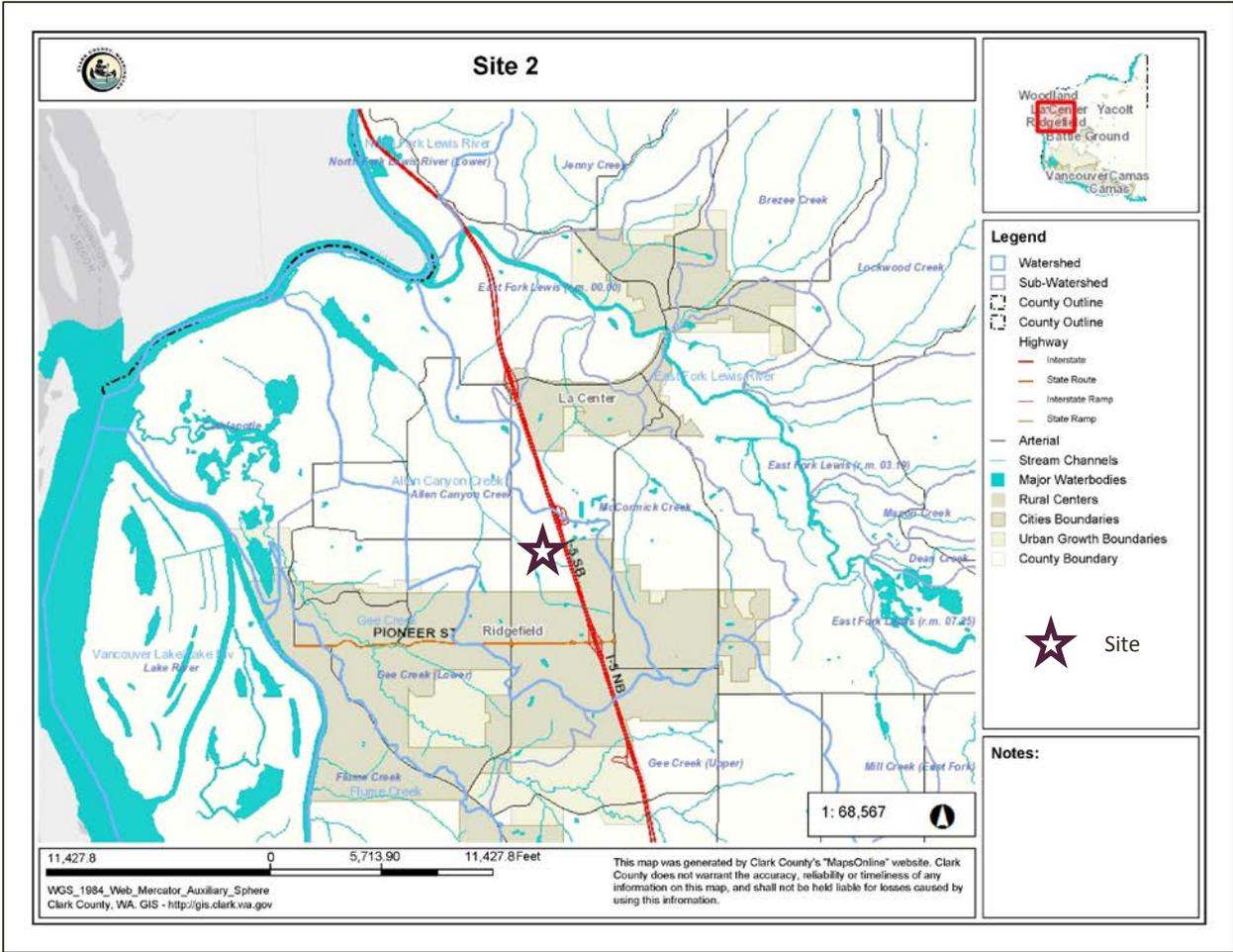
Source: Clark County GIS, BERK Consulting 2015

Exhibit 25. Site 2 and Areawide Docket Soil Capability Classes



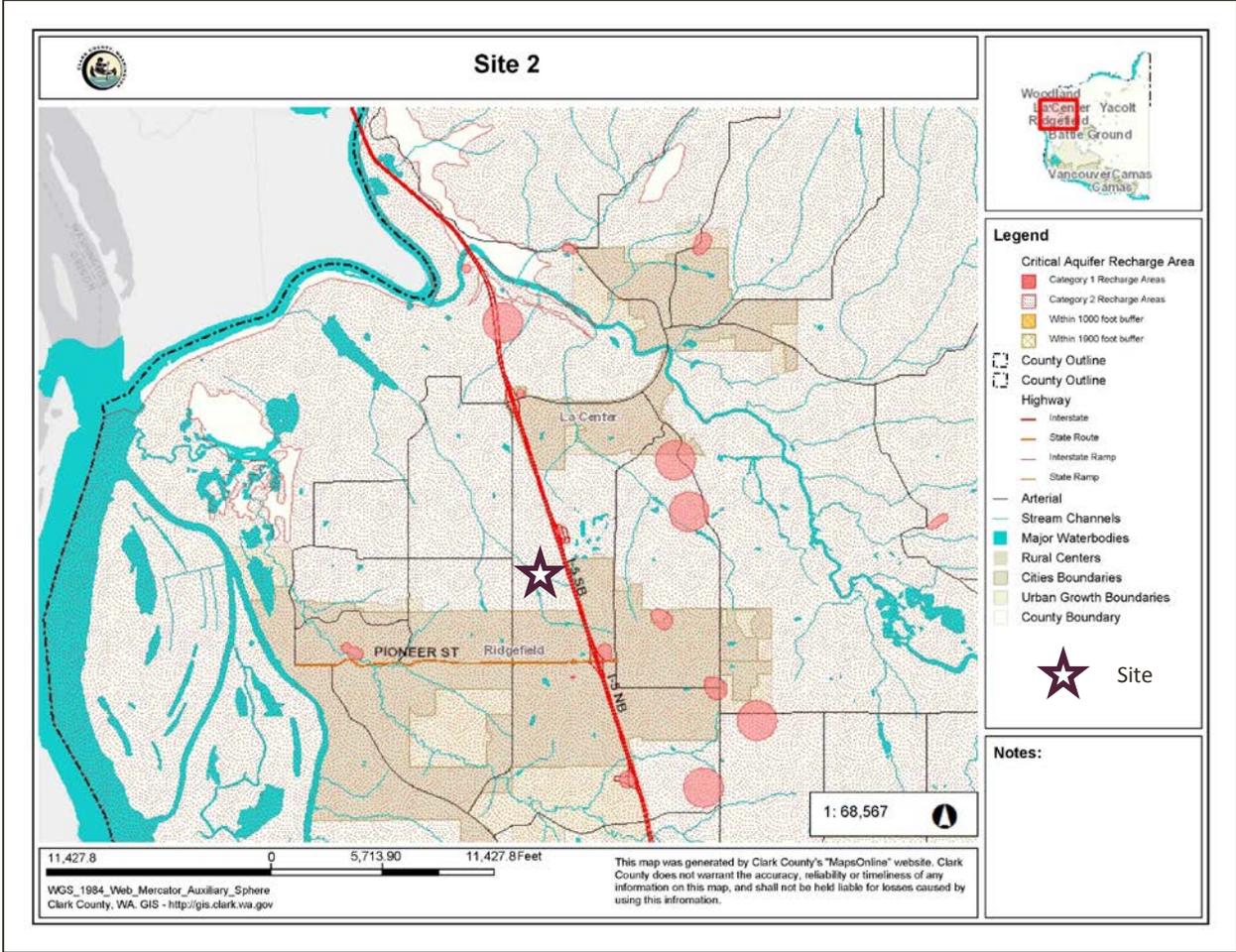
Source: Clark County GIS, BERK Consulting 2015

Exhibit 26. Site 2 and Areawide Vicinity Drainage Basins



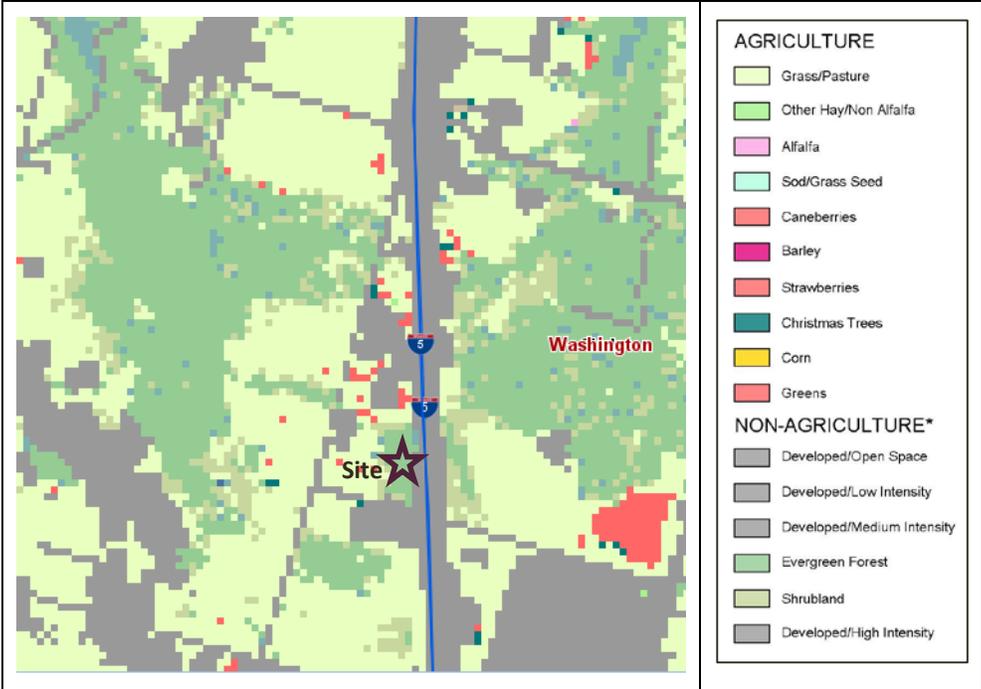
Source: Clark County GIS 2015

Exhibit 27. Site 2 and Areawide Aquifer Classifications in Vicinity



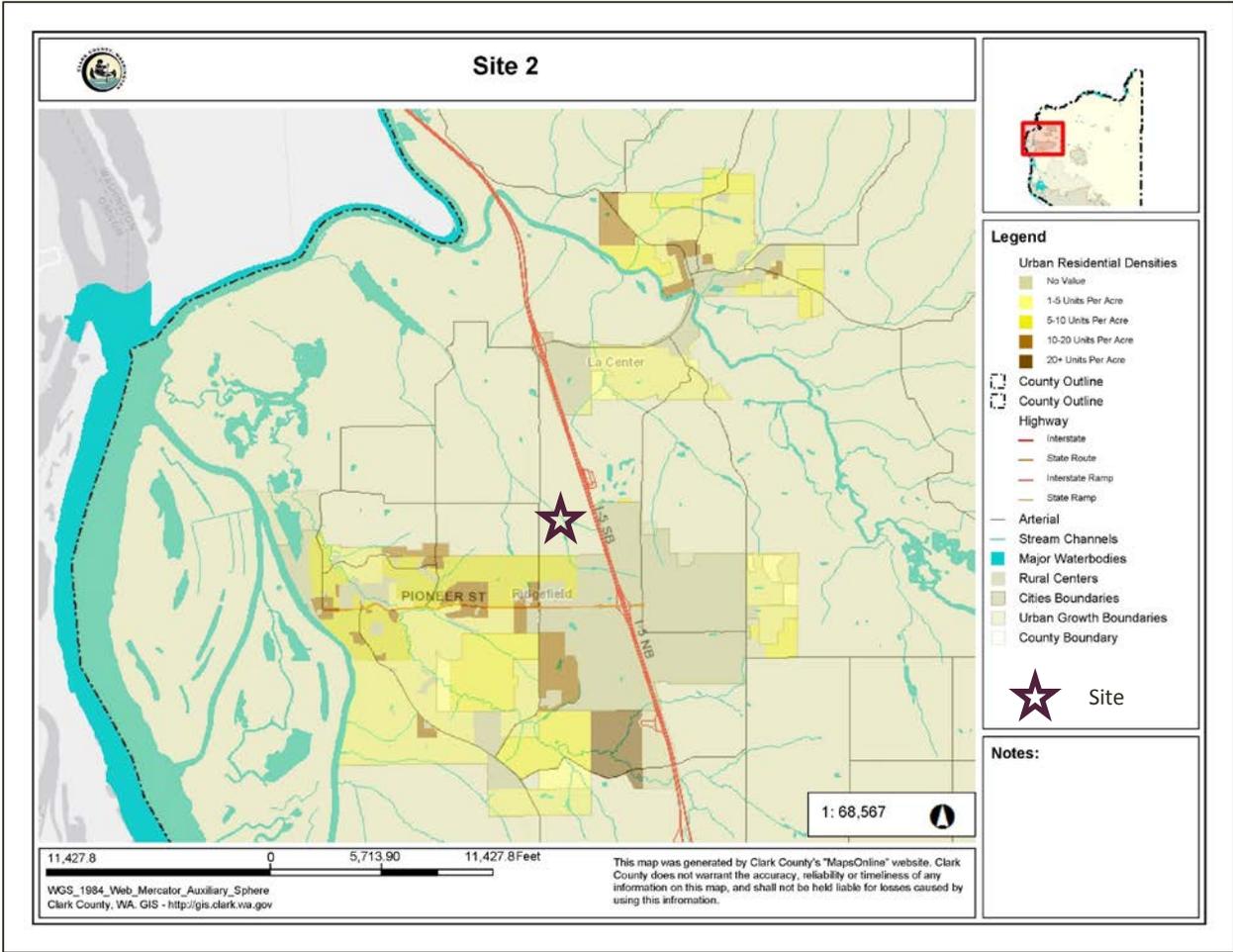
Source: Clark County GIS 2015

Exhibit 28. Site 2 and Areawide USDA CropScape Map



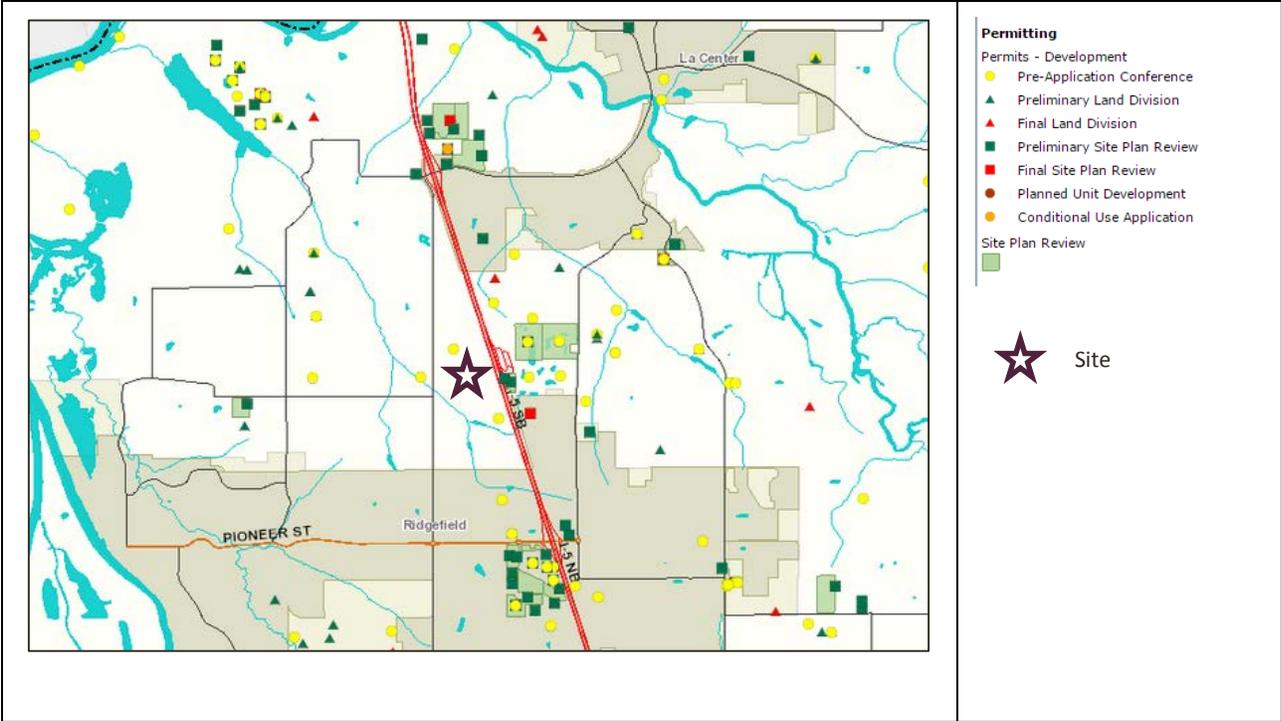
Source: USDA 2014

Exhibit 29. Site 2 and Areawide Nearby Urban Densities



Source: Clark County GIS 2015

Exhibit 30. Site 2 and Areawide Nearby Permit Activity



Source: Clark County GIS 2015

3.3 Agricultural Land Classification Criteria Analysis

This section presents a matrix analysis of how Site 2 and the Areawide Study Area compare to the minimum guidelines to classify agricultural lands in WAC 365-190-050. The matrix in Exhibit 31 compares Site 2 and Areawide Study Area results to the County’s 2007 analysis addressing a similar geographic boundary²². A summary of the analysis in the matrix is provided in Section 3.4.

Exhibit 31. Matrix: Site 2 and Areawide Study Area Agricultural Land Classification Criteria Analysis

	<u>WAC 365-190-050 Criteria</u>	2007 Analysis: Site 2	2015 Analysis: Site 2	2015 Analysis: Site 2 Areawide
A.	(1) In classifying and designating agricultural resource lands, counties must approach the effort as a county-wide or area-wide process. Counties and cities should not review resource lands designations solely on a parcel-by-parcel process. Counties and cities must have a program for the transfer or purchase of development rights prior to designating agricultural resource lands in urban growth areas. Cities are encouraged to coordinate their agricultural resource lands designations with their county and any adjacent jurisdictions.	Conducted as part of Comprehensive Plan Update in 2007. Only a small portion of the Site 2 areawide study area was evaluated – approximately 81.50 acres along N 10 th Street extended west of NW 31 st Avenue, containing 12 parcels of 0.31-19.74 acres in size.	Areawide analysis is being prepared for four RILB inventory sites including Site 2. See right.	The areawide study area includes Agriculture (Ag) designated land between the UGAs of LaCenter and Ridgefield, including areas abutting Site 2 and generally continuing in all directions until another non-Ag designation abuts, or until the I-5 freeway is reached.
B.	2) Once lands are designated, counties and cities planning under the act must adopt development regulations that assure the conservation of agricultural resource lands. Recommendations for those regulations are found in WAC 365-196-815.	The County has adopted development regulations to conserve agricultural resource lands.	The County has adopted development regulations to conserve agricultural resource lands.	The County has adopted development regulations to conserve agricultural resource lands.

²² The 2007 Analysis is documented in a May 21, 2007 memo and attachments prepared by Clark County Community Planning, entitled “Bringing Resource Lands into UGAs,” and directed to the Board of County Commissioners and Clark County Planning Commission. Available: <http://www.clark.wa.gov/planning/RuralLands/taskforce.html>. Accessed: October 2014.

	WAC 365-190-050 Criteria	2007 Analysis: Site 2	2015 Analysis: Site 2	2015 Analysis: Site 2 Areawide
C.	(3) Lands should be considered for designation as agricultural resource lands based on three factors:			
D.	(a) The land is not already characterized by urban growth. To evaluate this factor, counties and cities should use the criteria contained in WAC 365-196-310.	Rural land uses (open fields, rural residential, forested land, farm buildings).	The Site 2 study area parcels range from 0.26 to 75 acres. The parcels are in agricultural or rural residential use.	The Site 2 areawide parcels range from 0.26 to 75 acres. The majority of parcels range from 20-75 acres in size.
E.	(b) The land is used or capable of being used for agricultural production. This factor evaluates whether lands are well suited to agricultural use based primarily on their physical and geographic characteristics. Some agricultural operations are less dependent on soil quality than others, including some livestock production operations.	<p>IN COMMERCIAL PRODUCTION?</p> <ul style="list-style-type: none"> • None of the 12 parcels in this sub area were identified as commercial farms in the Globalwise report maps • 86% in ag/farm current use program <p>CAPABLE?</p> <ul style="list-style-type: none"> • 47% prime ag soils • 47.19% critical land • hydric soils, riparian habitat, wetland 	<p>Nearly all Site 2 is in current use taxation. NRCS soil data show less than half of the land in prime farmland or prime farmland if drained. Capability classes are 3, 4, 6 and 7. According to the NRCS, capability levels are limited for Class 3, and severely and very severely limited for Classes 4 -7. See Appendix A.</p> <p>Stormwater facilities in the form of ditches are found along study area roadways, and it likely the land is drained.</p>	<p>Over half of the study area is in current use taxation for agriculture. The NRCS soil data show over half of the study area is considered prime farmland or prime farmland if drained. Capability classes 1-4 and 6-7 are found in the area, but predominantly Classes 3-4 and 6 which have limitations as described for Site 2 alone. See also Appendix A.</p> <p>Drainage conditions are similar to Site 2 alone.</p>
F.	(i) Lands that are currently used for agricultural production and lands that are capable of such use must be evaluated for designation. The intent of a landowner to use land for agriculture or to cease such use is not the controlling factor in determining if land is used or capable of being used for agricultural production. Land enrolled in federal conservation reserve programs is recommended for designation based on previous agricultural use, management requirements, and potential for reuse as agricultural land.	See Row E above.	<p>Based on current use taxation records nearly all the site is used for agriculture.</p> <p>USDA Crop Scape Data for Site 2 indicate a majority of the site is in grass/pasture, deciduous forest, and caneberries.²³</p>	<p>Based on current use taxation records it appears over half of the land is used for agriculture.</p> <p>USDA Crop Scape Data show a similar range of crop types as for Site 2.</p>

²³ Terminology corrected in responses to comments January 2016.

	WAC 365-190-050 Criteria	2007 Analysis: Site 2	2015 Analysis: Site 2	2015 Analysis: Site 2 Areawide																																				
G.	(ii) In determining whether lands are used or capable of being used for agricultural production, counties and cities shall use the land-capability classification system of the United States Department of Agriculture Natural Resources Conservation Service as defined in relevant Field Office Technical Guides. These eight classes are incorporated by the United States Department of Agriculture into map units described in published soil surveys, and are based on the growing capacity, productivity and soil composition of the land	Prime farmland classes considered. Land capability class appears not to have been addressed.	<p>The study area contains capability classes 3, 4, 6 and 7. According to the NRCS, capability levels are limited for Class 3, and severely and very severely limited for Classes 4 and 6.</p> <table style="width: 100%; border-collapse: collapse;"> <tr><td>Class 1</td><td style="text-align: right;">0%</td></tr> <tr><td>Class 2</td><td style="text-align: right;">0%</td></tr> <tr><td>Class 3</td><td style="text-align: right;">54%</td></tr> <tr><td>Class 4</td><td style="text-align: right;">16%</td></tr> <tr><td>Class 5</td><td style="text-align: right;">0%</td></tr> <tr><td>Class 6</td><td style="text-align: right;">19%</td></tr> <tr><td>Class 7</td><td style="text-align: right;">10%</td></tr> <tr><td>Water</td><td style="text-align: right;">0%</td></tr> <tr><td>Total</td><td style="text-align: right;">100.0%</td></tr> </table> <p>Class 3 soils have severe limitations that reduce the choice of plants or that require special conservation practices, or both.</p> <p>Class 4 soils have very severe limitations that reduce the choice of plants or that require very careful management, or both.</p> <p>Class 6 soils have severe limitations that make them generally unsuitable for cultivation and that restrict their use mainly to pasture, rangeland, forestland, or wildlife habitat.</p> <p>Class 7 soils have very severe limitations that make them unsuitable for cultivation and that restrict their use mainly to grazing, forestland, or wildlife habitat.</p>	Class 1	0%	Class 2	0%	Class 3	54%	Class 4	16%	Class 5	0%	Class 6	19%	Class 7	10%	Water	0%	Total	100.0%	<p>The areawide information shows that the area contains Class 1, 2, 3, 4 with some Class 6 and 7 soils.</p> <table style="width: 100%; border-collapse: collapse;"> <tr><td>Class 1</td><td style="text-align: right;">1%</td></tr> <tr><td>Class 2</td><td style="text-align: right;">3%</td></tr> <tr><td>Class 3</td><td style="text-align: right;">47%</td></tr> <tr><td>Class 4</td><td style="text-align: right;">23%</td></tr> <tr><td>Class 5</td><td style="text-align: right;">0%</td></tr> <tr><td>Class 6</td><td style="text-align: right;">18%</td></tr> <tr><td>Class 7</td><td style="text-align: right;">7%</td></tr> <tr><td>Water</td><td style="text-align: right;">0%</td></tr> <tr><td>Total</td><td style="text-align: right;">100.0%</td></tr> </table> <p>See Site 2 descriptions plus:</p> <p>Class 1 soils have few limitations that restrict their use.</p> <p>Class 2 soils have moderate limitations that reduce the choice of plants or that require moderate conservation practices.</p>	Class 1	1%	Class 2	3%	Class 3	47%	Class 4	23%	Class 5	0%	Class 6	18%	Class 7	7%	Water	0%	Total	100.0%
Class 1	0%																																							
Class 2	0%																																							
Class 3	54%																																							
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Class 6	18%																																							
Class 7	7%																																							
Water	0%																																							
Total	100.0%																																							
H.	(c) The land has long-term commercial significance for agriculture. In determining this factor, counties and cities should consider the following nonexclusive criteria, as applicable:																																							

	WAC 365-190-050 Criteria	2007 Analysis: Site 2	2015 Analysis: Site 2	2015 Analysis: Site 2 Areawide
I.	(i) The classification of prime and unique farmland soils as mapped by the Natural Resources Conservation Service;	47% prime ag soils	About 34% of soils are considered prime farmland and 11% are prime farmland if drained. See Appendix A.	About 38% of soils are considered prime farmland and 19% are prime farmland if drained. See Appendix A.
J.	(ii) The availability of public facilities, including roads used in transporting agricultural products	No information provided	<p>I-5 is adjacent to the site on its east side. It is a designated freight route and a major interstate highway.</p> <p>I-5 carries urban traffic and is not a rural road used primarily for the transport of agricultural productions. NW 289th Street and NW 31st Avenue serving the site are Rural Major Collectors:</p> <p>CCC 40.350.030 defines a Rural Major Collector as follows: "Rural major collector" roads are rural extensions of urban minor arterials and some urban collectors. Their primary purpose is to link rural centers with nearby towns and cities and with state arterial routes. The provision of land access remains subordinate to providing for traffic movement. Parking is not allowed.</p> <p>There are no water or sewer lines within the site area. Sewer lines are planned south of the site in the Ridgefield UGA.²⁴ Sewer and water lines also lie east of I-5.</p>	<p>Similar road and infrastructure characteristics as for Site 2 alone. NW 319th Street in the northern extent of the study area is considered a scenic highway.</p> <p>In CCC 40.350.030 Scenic routes are defined as follows: Scenic routes are roadways with unique scenic or historical features, officially designated by the Board of County Commissioners. Scenic routes seek to enhance, preserve and facilitate the enjoyment of those scenic or historical features unique to each route.</p>
K.	(iii) Tax status, including whether lands are enrolled under the current use tax assessment under chapter 84.34 RCW and whether the optional public benefit rating system is used locally, and whether there is the ability to purchase or transfer land development rights;	86% in ag/farm current use program	A majority of the subject property is in the agricultural current use taxation program. Some properties in the northwest and southeast corners are not in the program.	A majority of the parcels in the study area west of the site are in current use taxation. Less than half of the parcels in the study area north of the site are in current use taxation.

²⁴ See future pump station, force main F-4 and gravity line T-10: <http://www.crwwd.com/ridgefield/docs/RidgefieldCollectionMap.pdf>.

	WAC 365-190-050 Criteria	2007 Analysis: Site 2	2015 Analysis: Site 2	2015 Analysis: Site 2 Areawide
L.	(iv) The availability of public services;	No information provided	The land is in the Clark County Fire & Rescue district and in the Ridgefield School District Boundary. The site is patrolled by the Clark County Sheriff's West district.	Same as for Site 2 alone.
M.	(v) Relationship or proximity to urban growth areas;	Directly adjacent to Ridgefield's Northern UGA boundary	The site is adjacent to the north boundary of the Ridgefield UGA and is close to the west boundary of the LaCenter UGA.	Same as for Site 2 alone.
N.	(vi) Predominant parcel size;	Range: 0.31-19.74 acres Median parcel size: 6.79 acres	The property contains parcels of 0.26 to 75 acres.	The property contains parcels of 0.26 to 75 acres. There is one parcel in the area west of the site that is under 0.25 acres in size.
O.	(vii) Land use settlement patterns and their compatibility with agricultural practices;	Rural land uses (open fields, rural residential, forested land, farm buildings)	The property is generally open in character, except for the agricultural related buildings and some homes. UGA territory is to the south.	The study area north of the site is generally open and has few agricultural and residential structures. Structures are concentrated in the northwest corner of the study area. The study area west of the site has more concentration of agricultural and residential structures in the parcels that are not in the current use taxation program.
P.	(viii) Intensity of nearby land uses;	More intense land uses are located within Ridgefield's UGA, south and SW of sub area. AG-20 zoning to the North and NE.	Densities within the Ridgefield UGA are generally 5-10 units per acre.	Same as for Site 2. Additionally uses in LaCenter are up to 5 units per acre on average.
Q.	(ix) History of land development permits issued nearby;	No urban development permits proposed in the vicinity of the subarea.	Some pre-application permits are recorded in the study area. Most permits are addressed in the Ridgefield and LaCenter UGAs.	Same as for Site 2.

	WAC 365-190-050 Criteria	2007 Analysis: Site 2	2015 Analysis: Site 2	2015 Analysis: Site 2 Areawide
R.	(x) Land values under alternative uses; and	AG-20: \$16 /acre Proposed zoning: R-12: \$195/acre	Land that is in current use assessment is taxed at below its market value typically at less than half. Some parcels in Site 2 that are 20 acres and in current use assessment show the following (higher values are properties with structures): Market Value: \$251,548.00 Taxable Value \$19,651.0 Market Value: \$345,204.00 Taxable Value \$118,126.00 Market Value: \$398,310.00 Taxable Value: \$156,227.00 Market Value: \$272,001.00 Taxable Value: \$6,433.00	Same as for Site 2.
S.	(xi) Proximity to markets.	Adjacent to Ridgefield UGA.	The site is adjacent to the north boundary of the Ridgefield UGA and is close to the west boundary of the LaCenter UGA.	Same as for Site 2 alone.
T.	(4) When designating agricultural resource lands, counties and cities may consider food security issues, which may include providing local food supplies for food banks, schools and institutions, vocational training opportunities in agricultural operations, and preserving heritage or artisanal foods.		In Clark County the number of small farms has been increasing over time, and represents more intensive, value-added, urban-oriented farming. ²⁵ USDA Crop Scape indicates land is in grass/pasture, deciduous forest, and caneberries. ²⁶ The Washington State Department of Agriculture (WSDA) database	Similar analysis as for Site 2.

²⁵ BERK. 2012. Clark County Rural Lands Study. Available: <http://www.clark.wa.gov/planning/rurallands/index.html>.

²⁶ Terminology corrected in responses to comments January 2016.

	WAC 365-190-050 Criteria	2007 Analysis: Site 2	2015 Analysis: Site 2	2015 Analysis: Site 2 Areawide															
			<p>at the section scale shows a predominance of hay/silage.</p> <p>The WSU Farm Locator indicates there is a tree farm in the study area: Finn Family Tree Farm.</p>																
U.	<p>(5) When applying the criteria in subsection (3)(c) of this section, the process should result in designating an amount of agricultural resource lands sufficient to maintain and enhance the economic viability of the agricultural industry in the county over the long term; and to retain supporting agricultural businesses, such as processors, farm suppliers, and equipment maintenance and repair facilities.</p>		<p>See Exhibit 17, row U.</p> <p>Relevant to Site 2 are statistics related to hay and tree farms.</p> <p>Hay and forage land represents the top cropland in acres in the County, 17,541 acres of 74,758 acres in farms. The number of farms with crops and hay shows an increase between 2002 and 2007 and a more recent decline in 2012:</p> <p>Similarly the planting of Christmas tree and other short term tree crops increased between 2002 and 2007 and declined in 2012.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th>1997</th> <th>2002</th> <th>2007</th> <th>2012</th> </tr> </thead> <tbody> <tr> <td>Crops & Hay</td> <td style="text-align: center;">-</td> <td style="text-align: center;">284</td> <td style="text-align: center;">429</td> <td style="text-align: center;">368</td> </tr> <tr> <td>Cut Christmas trees</td> <td style="text-align: center;">-</td> <td style="text-align: center;">46</td> <td style="text-align: center;">69</td> <td style="text-align: center;">58</td> </tr> </tbody> </table>		1997	2002	2007	2012	Crops & Hay	-	284	429	368	Cut Christmas trees	-	46	69	58	
	1997	2002	2007	2012															
Crops & Hay	-	284	429	368															
Cut Christmas trees	-	46	69	58															
V.	<p>(6) Counties and cities may further classify additional agricultural lands of local importance. Classifying additional agricultural lands of local importance should include, in addition to general public involvement, consultation with the board of the local conservation district</p>		<p>The County has not designated agricultural land of local importance. This is an optional policy choice.</p>	<p>Same as for Site 2.</p>															

<u>WAC 365-190-050 Criteria</u>	2007 Analysis: Site 2	2015 Analysis: Site 2	2015 Analysis: Site 2 Areawide
<p>and the local committee of the farm service agency. It may also be useful to consult with any existing local organizations marketing or using local produce, including the boards of local farmers markets, school districts, other large institutions, such as hospitals, correctional facilities, or existing food cooperatives.</p> <p>These additional lands may include designated critical areas, such as bogs used to grow cranberries or farmed wetlands. Where these lands are also designated critical areas, counties and cities planning under the act must weigh the compatibility of adjacent land uses and development with the continuing need to protect the functions and values of critical areas and ecosystems.</p>			

3.4 Summary and Conclusions

Site 2

Site 2 is zoned and used for agriculture but contain less than a majority of prime farmland soils. Parcels are moderate to relatively large in size with most between 5-75 acres. The long-term trend is of decline in large and mid-size operations, and rather an increase in small farms oriented to the urban, local food movement.

The agricultural market is showing an increase in small value added production and direct sales, CSAs, and other newer local food trends. The subject properties include tree and hay/silage operations. The sale of products locally is probable for tree farms.

The subject sites are in proximity of urban uses at urban densities; however, urban services and infrastructure are not immediately abutting. Aside from I-5 a limited access roadways, remaining roads are rural in character with Rural Major Collector and Scenic Highway designations by the County.

Site 2 is predominantly under current use taxation, and thus the effect of growth pressures is not felt fiscally. The value of the land under urban uses would be greater.

The RILB Inventory (BERK Consulting et al. September 2015, under separate cover) shows the property meets initial screening criteria to be considered a RILB.

If the property were to convert it would reduce the acres and number of farms consistent with long-term County trends.

Areawide

The areawide analysis is similar in terms of overall land use characteristics and location near services and infrastructure as for Site 2 alone. However, less of the boundary is in current use taxation, though a greater percent contains prime farmland soil.

4.0 SITE 3 AND AREAWIDE STUDY AREA

4.1 Study Area Description

This evaluation addresses Site 3 and an area similarly designated and zoned surrounding Site 3 south of Ridgefield. See Exhibit 32.

Exhibit 32. Site 3 and Areawide Study Area Description

Description	Comments
Site 3: North Vancouver Freeway	The site is about 764 acres and lies on either side of I-5 at SR 502 (NE 219 th Street).
Areawide Analysis: AG-20 Zoning in Vicinity of Site 3	The areawide study area includes 2,109 acres of Agriculture (Ag) designations between the UGAs of Ridgefield and Vancouver, including areas abutting Site 3 and generally continuing north, east, south, and west until another non-Ag designation abuts, or until the contiguous Ag pattern changes. The Ag designations are not contiguous in the study area; rural designations are more predominant in the central study area and split the two areas of Ag designation.

4.2 Maps Reviewed

A series of maps were reviewed as described in Exhibit 33 in order to conduct the Site 3 and Areawide analysis of agricultural land designation criteria in Section 4.3.

Exhibit 33. Maps Reviewed: Site 3 and Areawide Study Area

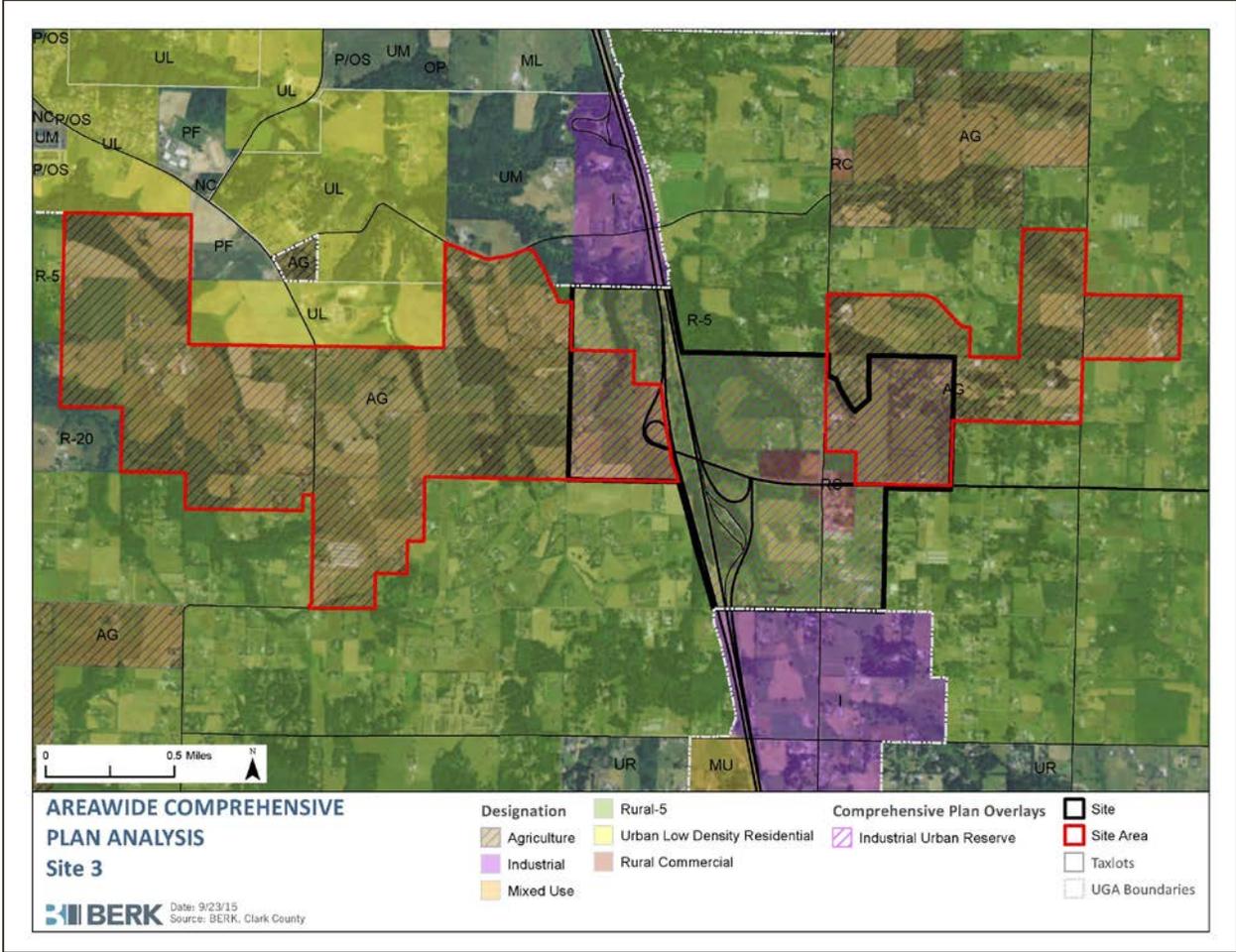
Maps	Comments
Comprehensive Plan	Site 3: Site is fully in Industrial Urban Reserve with Rural Commercial, Rural-5, and Agriculture designations. See Exhibit 34. Areawide: Same as Site 3 with added areas of Agriculture. See Exhibit 34.
Zoning	Site 3: Agriculture-20 (AG-20), Rural Commercial – Outside Rural Center (CR-1), and Rural-5 (R-5). See Exhibit 36. Areawide: Same as Site 3 with added AG-20 zoning. See Exhibit 36.
Soils	Site 3: Gee silt loam (0-8%) and Odne silt loam (0-5%) make up more than two-thirds of the study area soils. About 55% of the soils is considered prime farmland and 4% is prime farmland if drained. About 12% is farmland of statewide importance, and 29% is not prime farmland. Farmland classes are largely Classes 3, 4 and 6 with small areas of Classes 1 and 2. See Exhibit 39 and Appendix A. Areawide: Nearly half of the soils are Gee silt loam (0-8%), and Odne Silt Loam (0-5%) is the next largest share. The area contains 48% prime farmland, 3% prime farmland if drained, 20% farmland of statewide importance, and 28% not prime farmland. Farmland classes are predominantly Classes 3, 4 and 6 and small amounts of Classes 1, 2, and 7.
Topography	Site 3: Generally flat with more than three-quarters of the land with 0-8% slope. See Appendix A. Areawide: More than two thirds of the soils are 0-8% slopes.
Aerial photography	Site 3: See Exhibit 36. Most of the land includes single family homes and open fields. Areawide: See Exhibit 36. Most of the land includes open fields and residences.
Current Use	Site 3: Residential uses and open land with less than have in current use taxation. See Exhibit 34 and Exhibit 36. Areawide: Agriculture with majority of parcels in current use taxation in study areas to the west and east of the site. See Exhibit 34 and Exhibit 36.

Maps	Comments
Parcel size	<p>Site 3: Variable, with parcels from less than 0.26 to 75 acres in size. A majority of parcels are 1-5 acres in size and one parcel is between 20-75 acres in size .See Exhibit 35.</p> <p>Areawide: Variable, with parcels from 0.26 to 100 acres. Majority of study area are between 20-75 acres and one parcel is between 75-100 acres. See Exhibit 35.</p>
Infrastructure: Roads, Sewer, Water	<p>Site 3: I-5 runs north and south within the western portion of the site area. I-5 and SR 502/ NE 219th Street are designated freight routes. WA State Route 502 runs east and west through the middle of the site and connects with I-5 near the eastern border of the site. Water lines traverse the site area. Sewer lines are further south in the Vancouver UGA or further northwest in the Ridgefield UGA. See Exhibit 37.</p> <p>Areawide: There are a few water lines that run north and south through the study area east of the site. See Exhibit 37.</p>
Floodplains	<p>Site 3: There is floodway and floodway fringe area associated with Gee Creek running north and south through the western section of the site parallel to I-5.</p> <p>Areawide: Same as Site 3.</p>
Wetlands	<p>Site 3: Wetlands are mapped along Gee Creek that runs parallel to I-5. See Exhibit 38.</p> <p>Areawide: Wetlands are mapped study area to the west of the site near the southwest borders and to the east of the site. See Exhibit 38.</p>
Streams	<p>Site 3: Gee Creek and tributaries traverse the site.</p> <p>Areawide: Streams are found throughout the study area including Flume Creek and tributaries and Gee Creek and tributaries in Site 3. See Exhibit 38.</p>
Aquifer Recharge	<p>Site 3: Lies in a Category 2 Recharge Areas. See Exhibit 41.</p> <p>Areawide: Same as Site 3. See Exhibit 41.</p>
Geologic Hazards	<p>Site 3: Steep slopes predominate particularly west of I-5 along watercourses; see soil types with slopes 8% and greater in Appendix A.</p> <p>Areawide: Same as Site 3.</p>

Site 3 and Areawide Maps

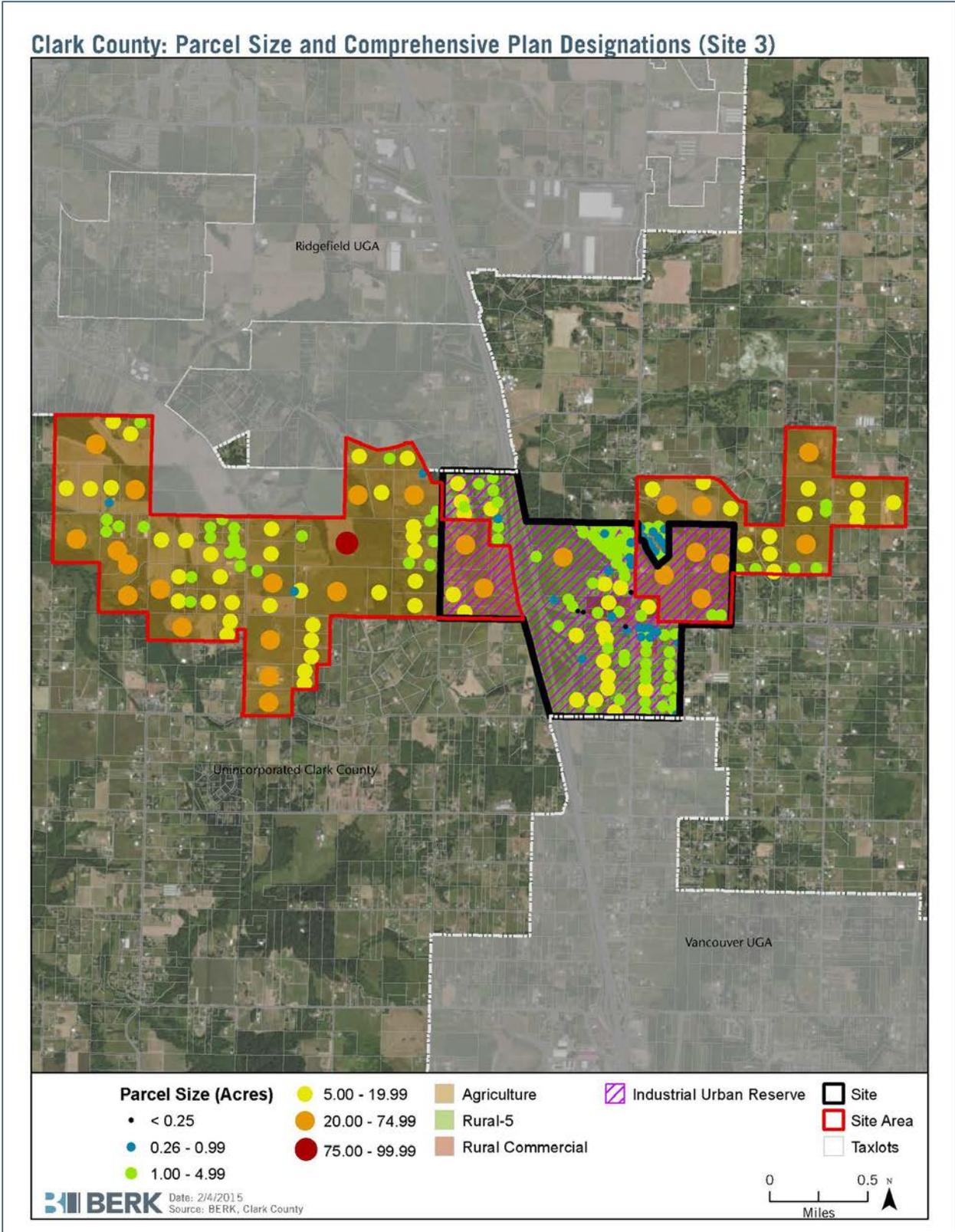
This Section presents maps specific to Site 3 as well as the Areawide Study Area regarding Comprehensive Plan designations, Zoning designations, parcel size, infrastructure, critical areas, soils and capability class, and other relevant topics. These maps are cross-referenced throughout the analysis.

Exhibit 34. Site 3 and Areawide Comprehensive Plan Designation



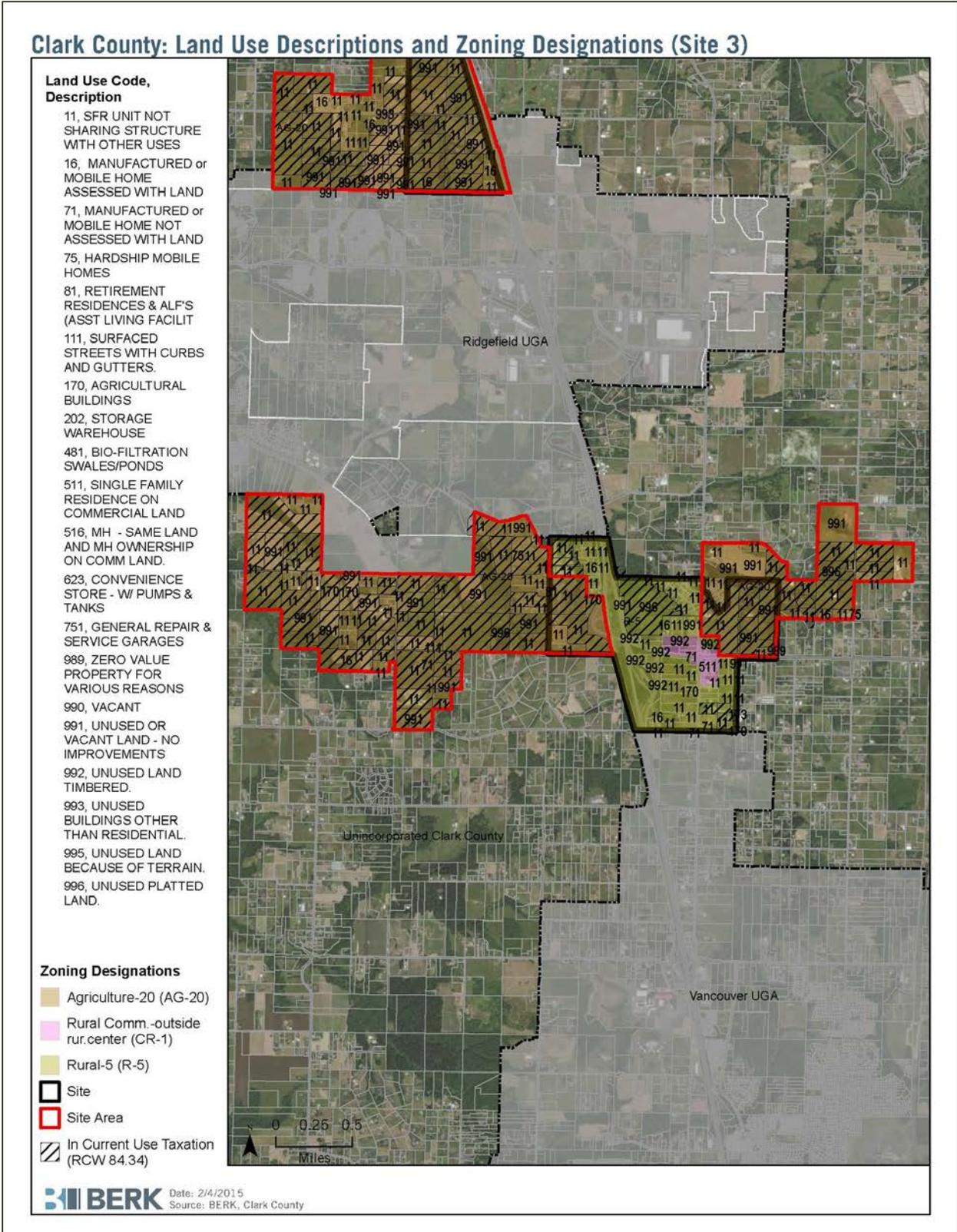
Source: Clark County GIS, BERK Consulting 2015

Exhibit 35. Site 3 and Areawide Comprehensive Plan Designation and Parcel Sizes



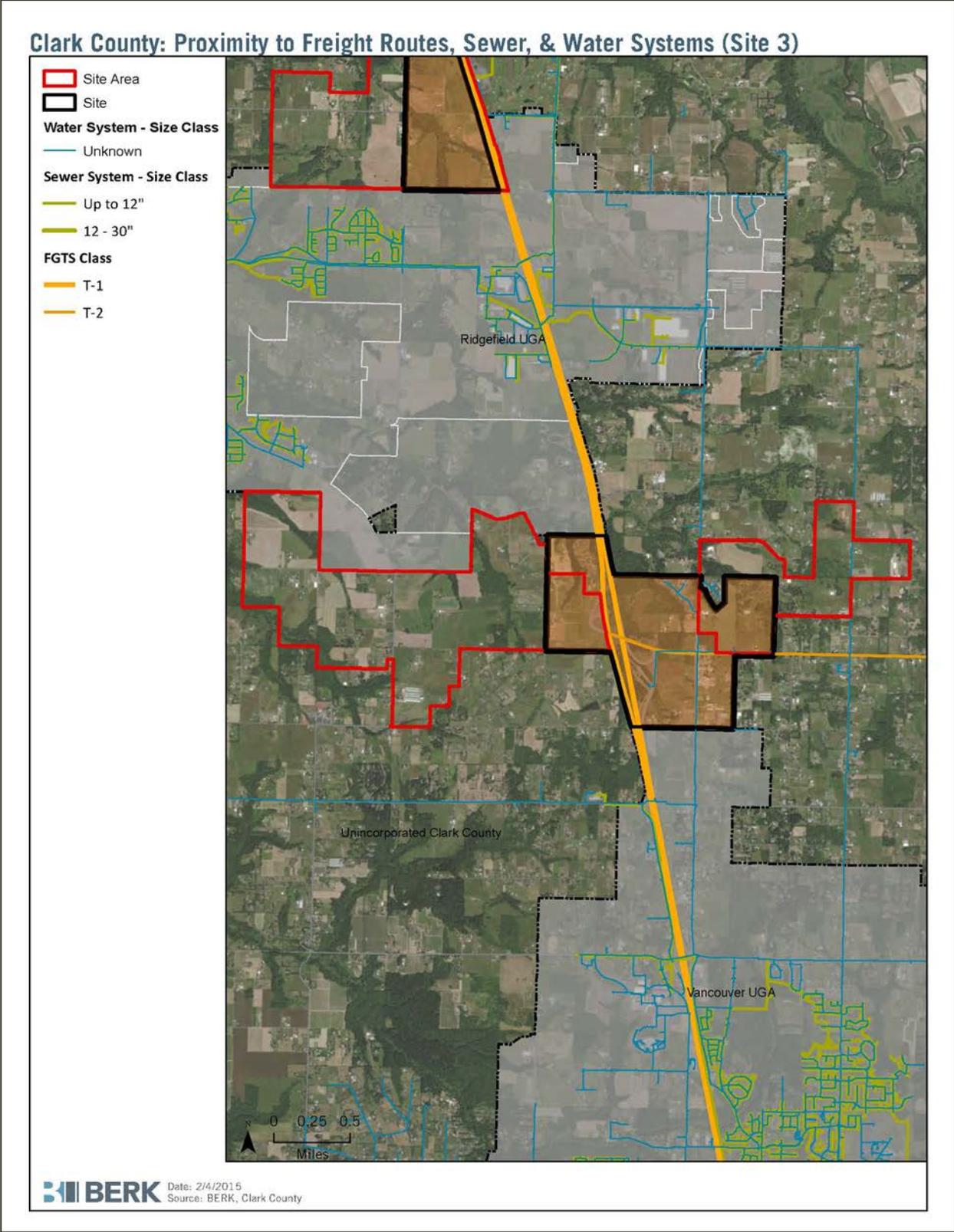
Source: Clark County GIS, BERK Consulting 2015

Exhibit 36. Site 3 and Areawide Current Land Uses and Zoning



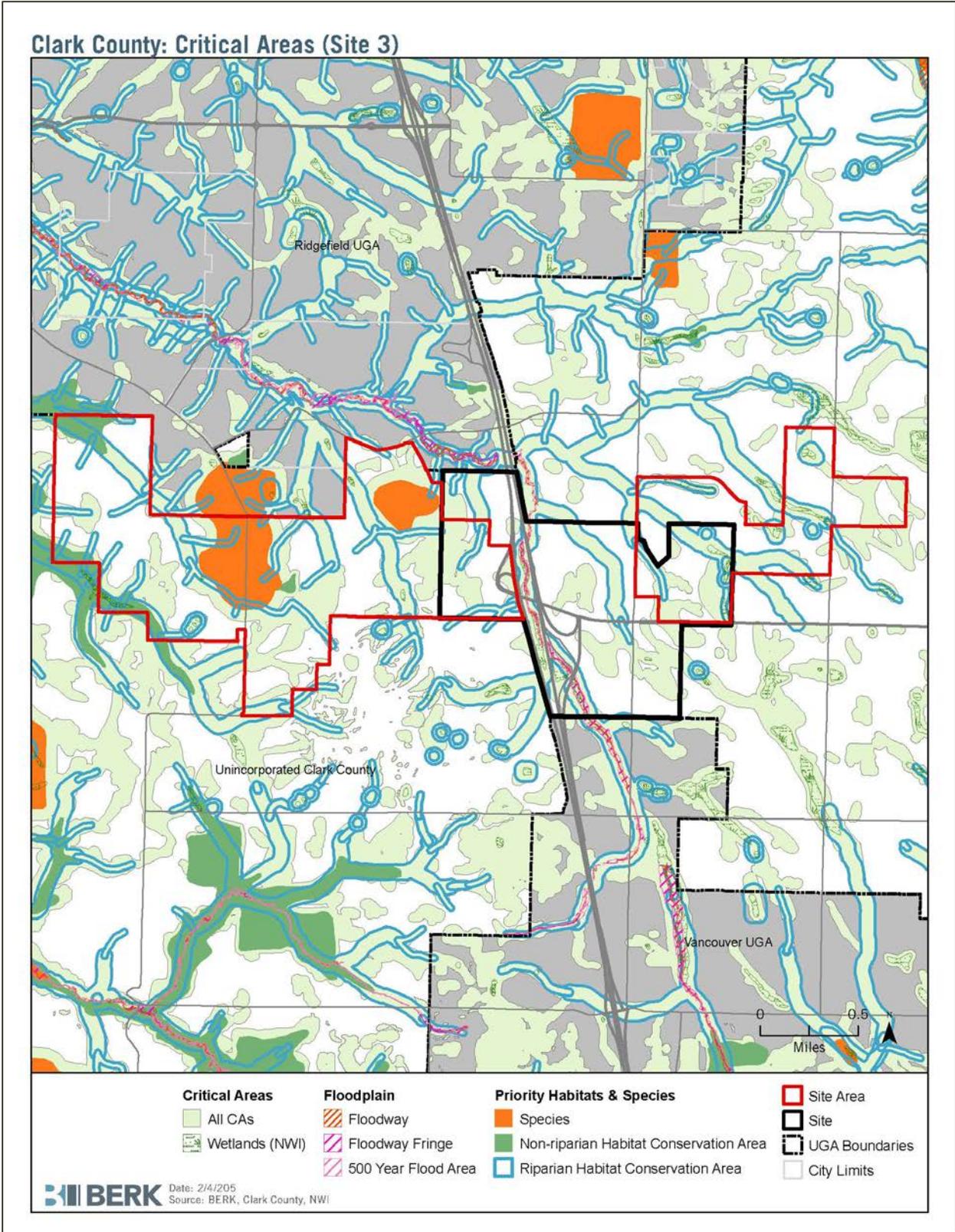
Source: Clark County GIS, BERK Consulting 2015

Exhibit 37. Site 3 and Areawide Proximity of Freight Routes, Water, and Sewer Facilities



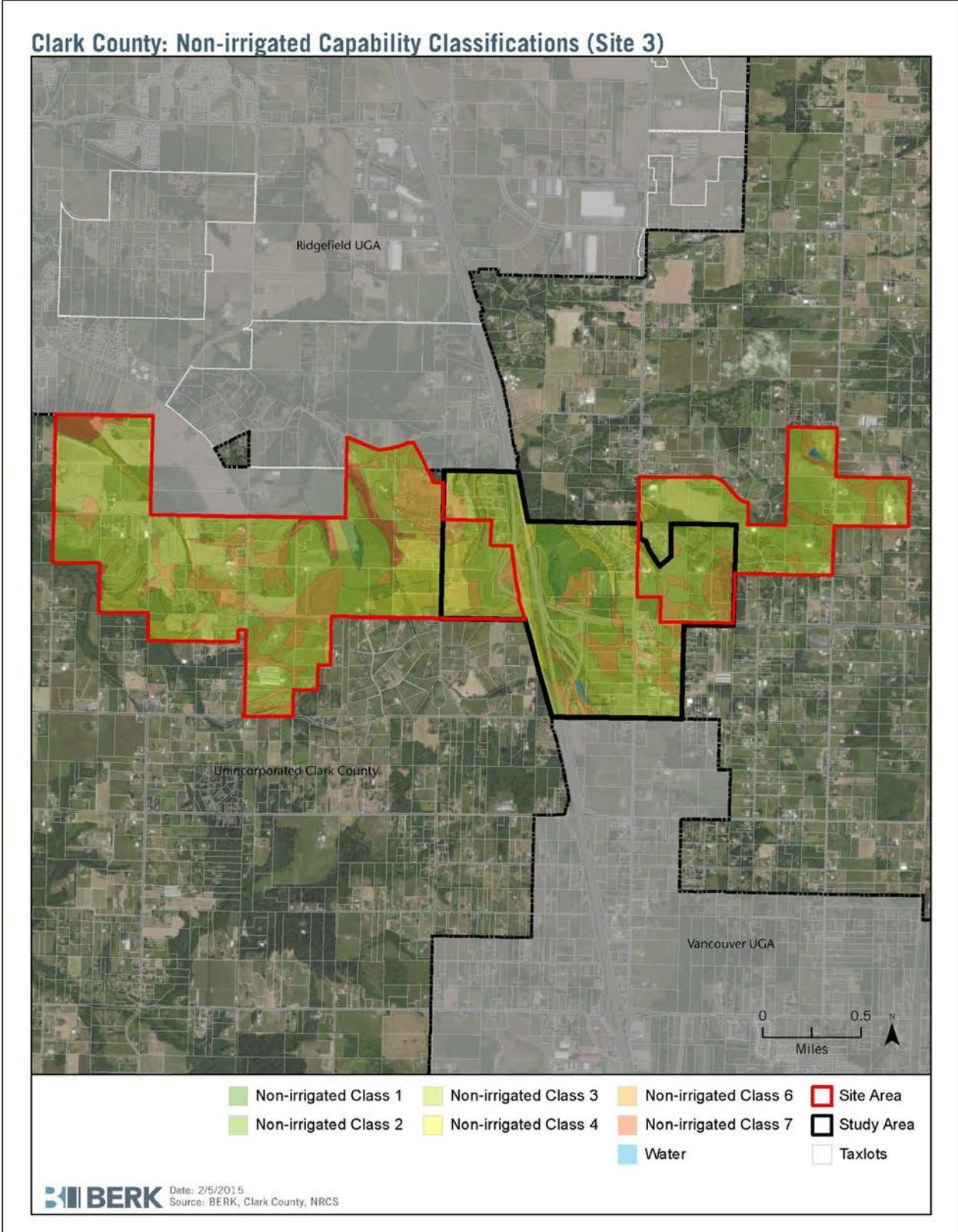
Source: Clark County GIS, BERK Consulting 2015

Exhibit 38. Site 3 and Areawide Mapped Presence of Critical Areas



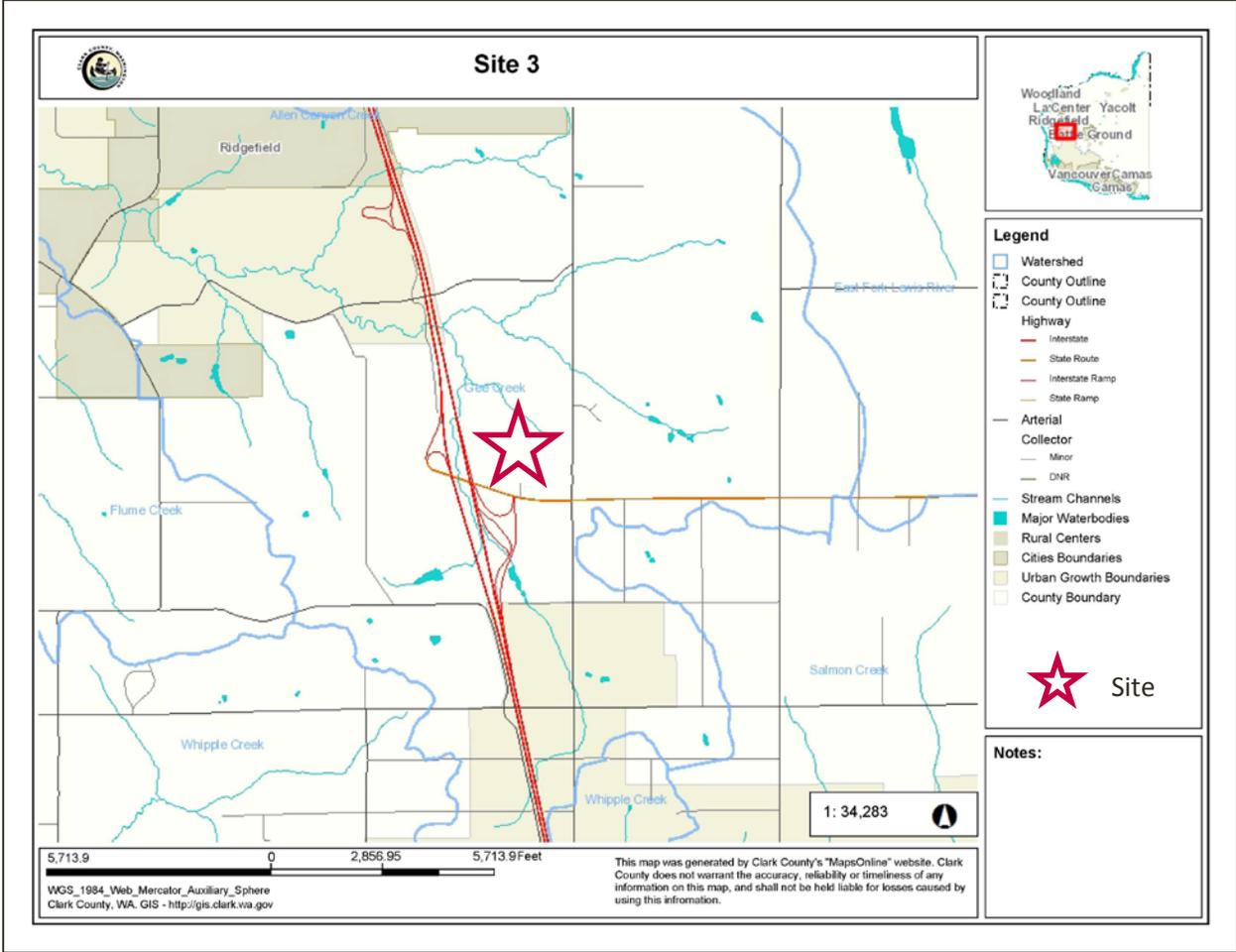
Source: Clark County GIS, BERK Consulting 2015

Exhibit 39. Site 3 and Areawide Docket Soil Capability Classes



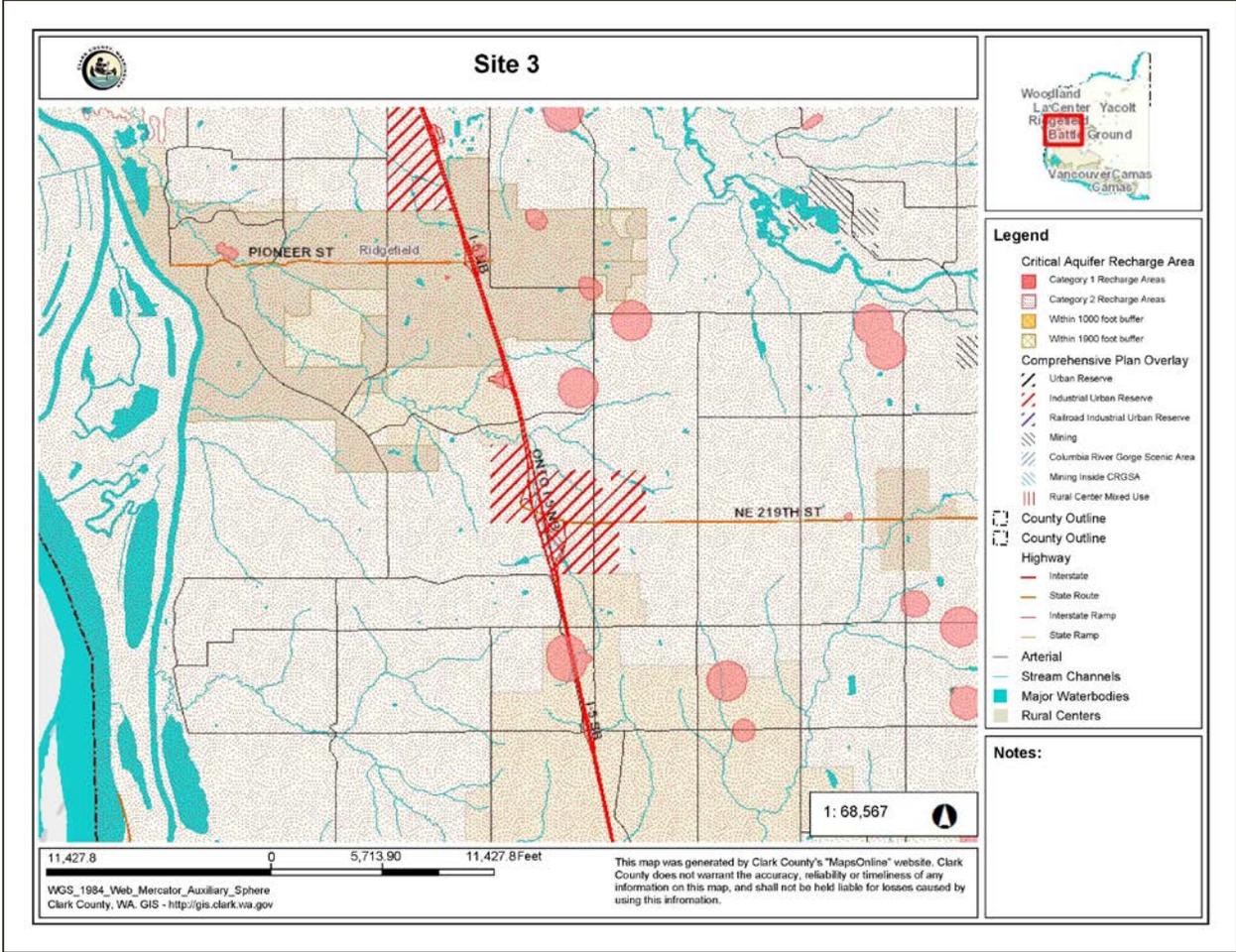
Source: Clark County GIS, BERK Consulting 2015

Exhibit 40. Site 3 and Areawide Vicinity Drainage Basins



Source: Clark County GIS 2015

Exhibit 41. Site 3 and Areawide Aquifer Classifications in Vicinity



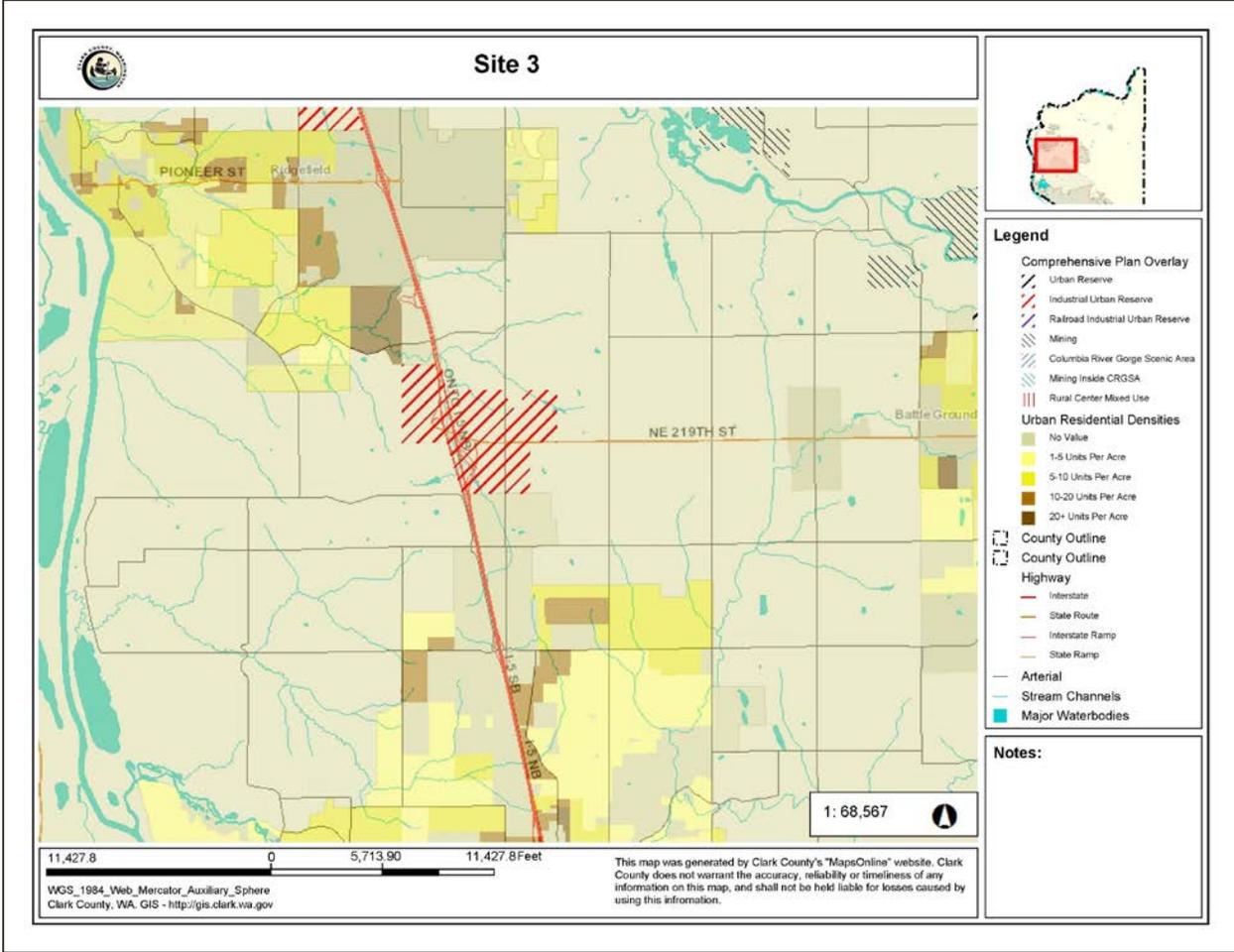
Source: Clark County GIS 2015

Exhibit 42. Site 3 and Areawide USDA CropScape Map



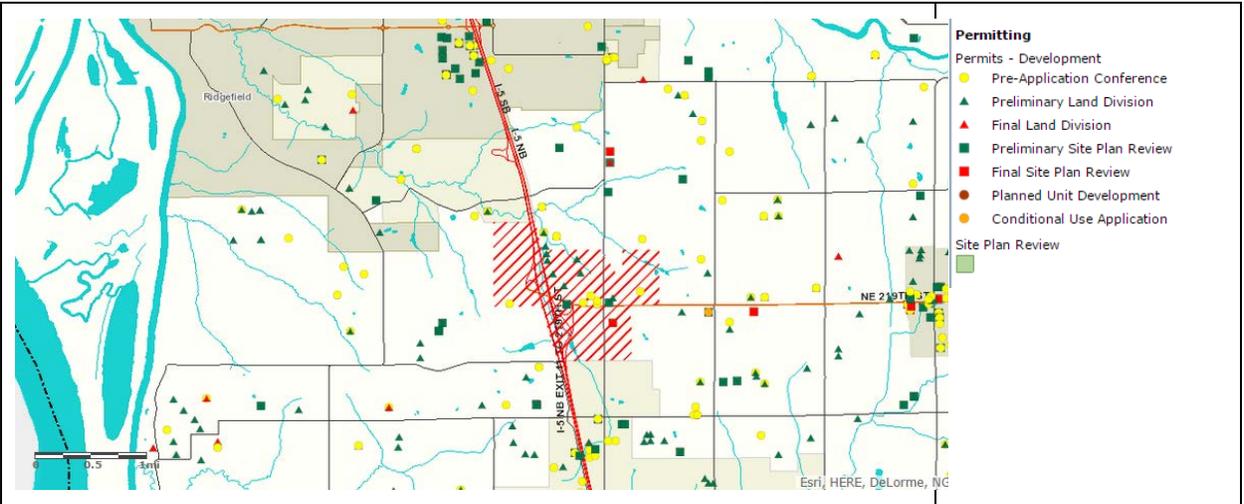
Source: USDA 2014

Exhibit 43. Site 3 and Areawide Nearby Urban Densities



Source: Clark County GIS 2015

Exhibit 44. Site 3 and Areawide Nearby Permit Activity



Source: Clark County GIS 2015

4.3 Agricultural Land Classification Criteria Analysis

GMA requires protection of agricultural, forest, and mineral lands of long-term commercial significance. This section presents a matrix analysis of how Site 3 and the Areawide Study Area compare to the minimum guidelines to classify agricultural lands in WAC 365-190-050 in Exhibit 45. This site was not evaluated in 2007. A summary of the analysis in the matrix is provided in Section 4.4.

Exhibit 45. Matrix: Site 3 and Areawide Study Area Agricultural Land Classification Criteria Analysis

	WAC 365-190-050 Criteria	2015 Analysis: Site 3	2015 Analysis: Site 3 Areawide
A.	(1) In classifying and designating agricultural resource lands, counties must approach the effort as a county-wide or area-wide process. Counties and cities should not review resource lands designations solely on a parcel-by-parcel process. Counties and cities must have a program for the transfer or purchase of development rights prior to designating agricultural resource lands in urban growth areas. Cities are encouraged to coordinate their agricultural resource lands designations with their county and any adjacent jurisdictions.	Areawide analysis is being prepared for four RILB inventory sites including Site 3. See right.	The study area includes Agriculture (Ag) designation between the UGAs of Ridgefield and Vancouver, including areas abutting Site 3 and generally continuing north, east, south and west until another non-Ag zone designation abuts, or until the contiguous Ag pattern changes (such as to the east where the Ag area is split by Rural designations or takes access from other roads). See Exhibit 34.
B.	2) Once lands are designated, counties and cities planning under the act must adopt development regulations that assure the conservation of agricultural resource lands. Recommendations for those regulations are found in WAC 365-196-815.	The County has adopted development regulations to conserve agricultural resource lands.	The County has adopted development regulations to conserve agricultural resource lands.
C.	(3) Lands should be considered for designation as agricultural resource lands based on three factors:		
D.	(a) The land is not already characterized by urban growth. To evaluate this factor, counties and cities should use the criteria contained in WAC 365-196-310.	Site 3 parcels range from less than 0.26 to 75 acres. The parcels are in agricultural or rural residential use.	The Site 3 areawide parcels range from 0.26 to 100 acres. The majority of the study area includes parcels that range from 20-75 acres in size.
E.	(b) The land is used or capable of being used for agricultural production. This factor evaluates whether lands are well suited to agricultural use based primarily on their physical and geographic characteristics. Some agricultural operations are	Much of the land is in current use taxation for agricultural purposes. About 55% is considered prime farmland and another 4% is prime farmland if drained. NRCS soil data show 60% of the land is Class 3 capability with small areas of	Much of the study area is in current use taxation for agriculture. The area contains 48% prime farmland, 3% prime farmland if drained, 20% farmland of statewide importance, and 28% not prime farmland. Farmland

	WAC 365-190-050 Criteria	2015 Analysis: Site 3	2015 Analysis: Site 3 Areawide																																				
	less dependent on soil quality than others, including some livestock production operations.	Class 1 (1%) and Class 2 (6%); the balance includes Class 4 and 6 soils, which are considered to have limitations. See Appendix A. Stormwater features include drainage ditches and culverts.	classes are predominantly Classes 3, 4 and 6 and small amounts of Classes 1, 2, and 7. See Appendix A. Stormwater features include drainage ditches and culverts.																																				
F.	(i) Lands that are currently used for agricultural production and lands that are capable of such use must be evaluated for designation. The intent of a landowner to use land for agriculture or to cease such use is not the controlling factor in determining if land is used or capable of being used for agricultural production. Land enrolled in federal conservation reserve programs is recommended for designation based on previous agricultural use, management requirements, and potential for reuse as agricultural land.	See Row E.	See Row E.																																				
G.	(ii) In determining whether lands are used or capable of being used for agricultural production, counties and cities shall use the land-capability classification system of the United States Department of Agriculture Natural Resources Conservation Service as defined in relevant Field Office Technical Guides. These eight classes are incorporated by the United States Department of Agriculture into map units described in published soil surveys, and are based on the growing capacity, productivity and soil composition of the land	<p>The study area contains non-irrigated Class 1, 2, 3, 4 with some Class 6 soils.</p> <table style="width: 100%; border-collapse: collapse;"> <tr><td>Class 1</td><td style="text-align: right;">1%</td></tr> <tr><td>Class 2</td><td style="text-align: right;">6%</td></tr> <tr><td>Class 3</td><td style="text-align: right;">60%</td></tr> <tr><td>Class 4</td><td style="text-align: right;">12%</td></tr> <tr><td>Class 5</td><td style="text-align: right;">0%</td></tr> <tr><td>Class 6</td><td style="text-align: right;">21%</td></tr> <tr><td>Class 7</td><td style="text-align: right;">0%</td></tr> <tr><td>Water</td><td style="text-align: right;">0%</td></tr> <tr><td>Total</td><td style="text-align: right;">100.0%</td></tr> </table> <p>According to the NRCS, capability levels are high or moderate for Class 1 and 2 soils and limited for Class 3, and in particular for Classes 4- 7. Most soils area Class 3.</p> <p>Class 1 soils have few limitations that restrict their use.</p>	Class 1	1%	Class 2	6%	Class 3	60%	Class 4	12%	Class 5	0%	Class 6	21%	Class 7	0%	Water	0%	Total	100.0%	<p>The areawide information shows that the area contains Class 1, 2, 3, 4 with some Class 6 and 7 soils. Most soils area Class 3.</p> <table style="width: 100%; border-collapse: collapse;"> <tr><td>Class 1</td><td style="text-align: right;">1%</td></tr> <tr><td>Class 2</td><td style="text-align: right;">2%</td></tr> <tr><td>Class 3</td><td style="text-align: right;">65%</td></tr> <tr><td>Class 4</td><td style="text-align: right;">10%</td></tr> <tr><td>Class 5</td><td style="text-align: right;">0%</td></tr> <tr><td>Class 6</td><td style="text-align: right;">19%</td></tr> <tr><td>Class 7</td><td style="text-align: right;">3%</td></tr> <tr><td>Water</td><td style="text-align: right;">0%</td></tr> <tr><td>Total</td><td style="text-align: right;">100.0%</td></tr> </table> <p>See Site 3 at left for descriptions, plus: Class 7 soils have very severe limitations that make them unsuitable for cultivation and that restrict their use mainly to grazing, forestland, or wildlife habitat.</p>	Class 1	1%	Class 2	2%	Class 3	65%	Class 4	10%	Class 5	0%	Class 6	19%	Class 7	3%	Water	0%	Total	100.0%
Class 1	1%																																						
Class 2	6%																																						
Class 3	60%																																						
Class 4	12%																																						
Class 5	0%																																						
Class 6	21%																																						
Class 7	0%																																						
Water	0%																																						
Total	100.0%																																						
Class 1	1%																																						
Class 2	2%																																						
Class 3	65%																																						
Class 4	10%																																						
Class 5	0%																																						
Class 6	19%																																						
Class 7	3%																																						
Water	0%																																						
Total	100.0%																																						

	WAC 365-190-050 Criteria	2015 Analysis: Site 3	2015 Analysis: Site 3 Areawide
		<p>Class 2 soils have moderate limitations that reduce the choice of plants or that require moderate conservation practices.</p> <p>Class 3 soils have severe limitations that reduce the choice of plants or that require special conservation practices, or both.</p> <p>Class 4 soils have very severe limitations that reduce the choice of plants or that require very careful management, or both.</p> <p>Class 6 soils have severe limitations that make them generally unsuitable for cultivation and that restrict their use mainly to pasture, rangeland, forestland, or wildlife habitat.</p>	
H.	(c) The land has long-term commercial significance for agriculture. In determining this factor, counties and cities should consider the following nonexclusive criteria, as applicable:		
I.	(i) The classification of prime and unique farmland soils as mapped by the Natural Resources Conservation Service;	About 55% of soils are considered prime farmland, and 4% are prime farmland if drained. See Appendix A.	About 48% of soils are considered prime farmland, and 3% are prime farmland if drained. See Appendix A.
J.	(ii) The availability of public facilities, including roads used in transporting agricultural products	<p>I-5 runs north and south through the eastern section of the site. It is a designated freight route and a major interstate highway.</p> <p>I-5 carries urban traffic and is not a rural road used primarily for the transport of agricultural productions.</p> <p>SR 502 runs east and west and cuts through the middle of the site where it joins I-5. It carries urban volumes and is a state designated freight route. Traffic on SR 502 is expected to double in the next 20 years. WSDOT has a widening project to increase the width from 2 lanes to 4 lanes.²⁷</p>	Similar as for Site 3. See Exhibit 37.

²⁷ WSDOT. 2015. SR 502 - Widening From I-5 to Battle Ground. Available: <http://www.wsdot.wa.gov/projects/SR502/Widening/>.

	WAC 365-190-050 Criteria	2015 Analysis: Site 3	2015 Analysis: Site 3 Areawide
		<p>Some water lines traverse the area. Sewer lines are further south in the Vancouver UGA or further northwest in the Ridgefield UGA. See Exhibit 37.</p> <p>The Clark Regional Wastewater District has planned capital project line extensions between 2014 and 2019, including the Discovery Corridor Wastewater Transmission System. Improvements will traverse the Site 3 area in order to connect the Ridgefield UGA to the Salmon Creek Wastewater Management System.²⁸</p>	
K.	(iii) Tax status, including whether lands are enrolled under the current use tax assessment under chapter 84.34 RCW and whether the optional public benefit rating system is used locally, and whether there is the ability to purchase or transfer land development rights;	Parcels with AG-20 zoning are in the program as well as Rural zoned property in ag use. Many rural-zoned properties are not in the program.	A majority of the parcels in the study areas west and east of Site 3 are in current use taxation.
L.	(iv) The availability of public services;	The Ridgefield School District serves the site. The South Ridge Elementary School lies south of the site. The site is also served by the Clark County Fire & Rescue District. The site is patrolled by the Clark County Sheriff's West district.	Same as Site 3 alone.
M.	(v) Relationship or proximity to urban growth areas;	The site is adjacent to the south boundary of the Ridgefield UGA and adjacent to the north boundary of the Vancouver UGA.	The study area west of the site is adjacent to the south boundary of the Ridgefield. The study area east of the site is not adjacent to any UGAs.
N.	(vi) Predominant parcel size;	The site contains parcels of less than 0.26 to 75 acres. The majority of parcels range in size from 0.26 to 20 acres.	The study area west of the site contains parcels of 0.26 to 100 acres. There is one parcel that is between 75 to 100 acres in size. The study east of the site contains parcels of 0.26 to 75 acres.
O.	(vii) Land use settlement patterns and their compatibility with agricultural practices;	The property is generally open in character, but there is development in the central parts of the site, particularly along and near major roads and intersections.	The study area west of the site is generally open and has few agricultural and residential structures. Structures are concentrated in the western section of this study area. The study area east of the site is also

²⁸ See project description and maps: <http://www.crwwd.com/projects/dcwt/index.php>.

	WAC 365-190-050 Criteria	2015 Analysis: Site 3	2015 Analysis: Site 3 Areawide
		UGA territory is to the south and northwest.	generally open with some agricultural and residential structures scattered throughout the study area.
P.	(viii) Intensity of nearby land uses;	Densities in UGAs near the site are: 5-10 units per acre, 10-20 units per acre and some 1-5 units per acre. See Exhibit 43.	Same as Site 3. Further westward and eastward of the areawide boundary lands are more rural.
Q.	(ix) History of land development permits issued nearby;	There have been permits within and surrounding Site 3; there is a concentration of permits in the UGAs.	Same as for Site 3. There is a lesser concentration of permits outside of Site 3 but within the areawide boundary.
R.	(x) Land values under alternative uses; and	Properties under current use assessment in the study area are reduced compared to taxable value. An agricultural property abutting I-5 shows: Market Value \$631,642.00 Taxable Value \$106,571.00 A property with structures is also well discounted: Market Value \$456,834.00 Taxable Value \$300,940.0	Results are similar as for Site 3. More properties are in current use assessment and discounted.
S.	(xi) Proximity to markets.	Abuts Vancouver and Ridgefield UGAs. West of Battleground UGA.	Same as for Site 3.
T.	(4) When designating agricultural resource lands, counties and cities may consider food security issues, which may include providing local food supplies for food banks, schools and institutions, vocational training opportunities in agricultural operations, and preserving heritage or artisanal foods.	See Exhibit 17 and Exhibit 31. In Clark County the number of small farms has been increasing over time, and represents more intensive, value-added, urban-oriented farming. ²⁹ The area is in hay/silage predominantly according to USDA and WSDA information. It is not known if this site provides products to the local market.	See Exhibit 17 and Exhibit 31. Most of the area is documented as having hay/silage. It is not known if this site provides products to the local market. Oltmann Farms Inc. is in the study area to the east and produces hay, oats and wheat sold out of their barn and have provided agri-tourism in the form of a pumpkin patch. ³⁰

²⁹ BERK. 2012. Clark County Rural Lands Study. Available: <http://www.clark.wa.gov/planning/rurallands/index.html>.

³⁰ The Reflector. October 8, 2014. "Oltmann Farms offers pumpkins, fall fun for families." Available: http://www.thereflector.com/home_scene/article_47303530-4e7b-11e4-9c50-bb59eef9e2cc.html

	<u>WAC 365-190-050 Criteria</u>	2015 Analysis: Site 3	2015 Analysis: Site 3 Areawide
U.	(5) When applying the criteria in subsection (3)(c) of this section, the process should result in designating an amount of agricultural resource lands sufficient to maintain and enhance the economic viability of the agricultural industry in the county over the long term; and to retain supporting agricultural businesses, such as processors, farm suppliers, and equipment maintenance and repair facilities.	See Exhibit 17 Row U and Exhibit 31 Row U. The area supports hay/silage which represents the top crop in the county.	See Exhibit 17 Row U and Exhibit 31 Row U. The area supports hay/silage which represents the top crop in the county.
V.	(6) Counties and cities may further classify additional agricultural lands of local importance. Classifying additional agricultural lands of local importance should include, in addition to general public involvement, consultation with the board of the local conservation district and the local committee of the farm service agency. It may also be useful to consult with any existing local organizations marketing or using local produce, including the boards of local farmers markets, school districts, other large institutions, such as hospitals, correctional facilities, or existing food cooperatives. These additional lands may include designated critical areas, such as bogs used to grow cranberries or farmed wetlands. Where these lands are also designated critical areas, counties and cities planning under the act must weigh the compatibility of adjacent land uses and development with the continuing need to protect the functions and values of critical areas and ecosystems.	The County has not designated agricultural land of local importance. This is an optional policy choice.	Same as for Site 3.

4.4 Summary and Conclusions

Site 3

Site 3 is zoned for rural and agricultural uses and contains about 764 acres. Just over half of the site is considered prime farmland soils, and a portion of it is in current use taxation. The parcels are moderate and smaller sizes and have a greater concentration of homes than other sites under review.

The agricultural market is showing an increase in small value added production and direct sales, CSAs, and other newer local food trends. The properties appear to have hay/silage, and the relationship to the local food system is unknown.

The subject sites are in proximity of urban uses at urban densities, with water service; sewer service is located further away, but is planned to go through the area to serve the Ridgefield UGA. Schools are located in proximity to the sites. Fire protection is by special district. There has been recent permit activity regarding commercial and residential uses to the south and north of the sites in the UGA though some permitting has occurred in the rural portions of the site. SR 502 and I-5 facilitate urban traffic.

Some of the site is under current use taxation, and thus the effect of growth pressures is not felt fiscally; rural zoned areas have less land in current use taxation. The value of the land under urban uses would be greater.

The RILB Inventory (BERK Consulting et al. September 2015, under separate cover) shows the property meets screening criteria to be considered a RILB.

Areawide

The areawide study area consists of about 2,109 acres, and Site 3 is about 36% of the areawide study area.

If Site 3 were removed from the AG-20 designation, about 64% of the areawide study area would remain in AG-20 zoning; the reduction of the AG-20 zone would reduce land designated agriculture at the eastern and western extent of the AG-20 zoning along SR 502 and NW 219th Street. The area east of I-5 zoned AG-20 would be notably smaller whereas if the area were reduced on the west the reduction would be less marked. There is no known interdependence among the agricultural businesses.

Most of the land is documented to be in hay/silage but specific agricultural uses are unknown. One of the farms is documented to serve the local food market and sells directly to the public. This is similar to the countywide trend of small high value farms.

Within the study area, the uses are typically agriculture and rural residential lots.

There are schools abutting the study area. Emergency services are provided by a fire district and the Clark County Sheriff, and these would continue in any case. There has been recent permit activity regarding commercial and residential uses encircling and within the study area. The volume of traffic on SR 502 and I-5 is that of an urban arterial.

Most of the broader study area is in current use taxation especially to the eastern and western extents, and it is likely the value of the land for urban uses would be higher than for the use under agriculture.

5.0 SITE 4 AND AREAWIDE STUDY AREA

5.1 Study Area Description

This evaluation addresses Site 4 and an area similarly designated and zoned surrounding Site 4 east of Vancouver. See Exhibit 46.

Exhibit 46. Site 4 and Areawide Study Area Description

Description	Comments
Site 4: Vancouver East	The site is about 366 acres and lies east of the Vancouver UGA and NE 162 nd Street.
Areawide Analysis:	The areawide study area includes Agricultural designation between the UGAs of Vancouver and Camas, including areas abutting Site 4 and generally encompassing the full contiguous Agricultural designation until it abuts a non-Agricultural designation.

5.2 Maps Reviewed

A series of maps were reviewed as described in Exhibit 47 in order to conduct the Site 4 and Areawide analysis of agricultural land designation criteria in Section 5.3.

Exhibit 47. Maps Reviewed: Site 4 and Areawide Study Area

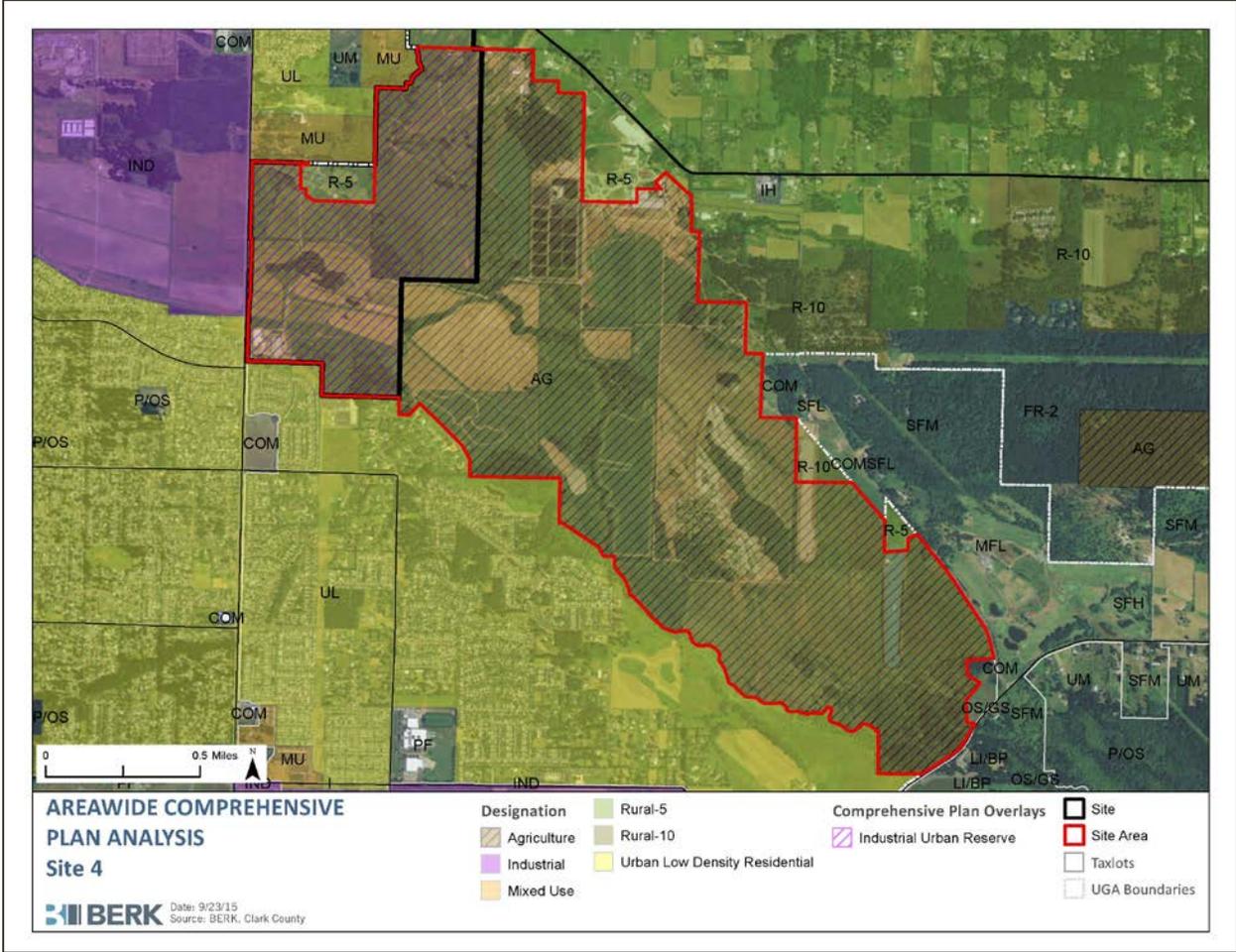
Maps	Comments
Comprehensive Plan	Site 4: Site is 366 acres, and is designated an Industrial Urban Reserve Overlay with Agriculture designation and small areas of Rural designation. See Exhibit 48. Areawide: Area east and southeast of Site 4 has an Agriculture designation and equals about 1,533 acres. See Exhibit 48.
Zoning	Site 4: Agriculture-20 (AG-20) and Rural-5 (R-5). See Exhibit 50. Areawide: AG-20 east of Site 4 (which has AG-20 and R-5 designations). See Exhibit 50.
Soils	Site 4: Cove silty clay loam, Semiahmoo muck and Gee silt loam make most of the study area soils. About 30% of the study area soil is considered prime farmland and 29% is prime farmland if drained. Approximately 41% is not prime farmland. See Appendix A. Areawide: Most of the land (67%) is Cove silty clay loam, 0-3%. Semiahmoo muck is the second most prevalent (15%). See Appendix A.
Topography	Site 4: Generally flat most of the land with 0-8% slope. See soil report, Appendix A. Areawide: The area is generally flat at 0-8% with very little land at 8-20%.
Aerial photography	Site 4: Along perimeter roads there are dairy buildings and a few residences. Most of the land is open. Areawide: Similar to Site 4 but with greater extents of open agricultural and environmentally constrained land.
Current Use	Site 4: Mainly agriculture with few parcels in residential use. Most of the land is in current use taxation. See Exhibit 50. Areawide: Agriculture with majority of parcels in current use taxation. See Exhibit 50.
Parcel size	Site 4: Variable, with parcels ranging from 1 to 100 acres and greater. See Exhibit 49. Areawide: Variable, with parcels from 0.26 to 100 acres and greater. Majority of study area is within parcels ranging in size from 20-100 acres. See Exhibit 49.

Maps	Comments
Infrastructure: Roads, Sewer, Water	<p>Site 4: SR 500 is on the northern border of the site, and NE 162nd on the western border is a state designated freight route. Sewer and water lines are available on NE 162nd Street. See Exhibit 51.</p> <p>Areawide: Aside from sewer and water available along Site 4 there is no major water or sewer system infrastructure within the study area. See Exhibit 51.</p>
Floodplains	<p>Site 4: The northeast section of the site contains floodway and floodway fringe areas.</p> <p>Areawide: The majority of the study area contains a floodway, floodway fringe and 500 year flood area.</p>
Wetlands	<p>Site 4: Wetlands are mapped, see Exhibit 52. There are wetland areas on the western side of the Site near NE 162nd Street.</p> <p>Areawide: Wetlands and riparian areas are mapped. See Exhibit 52.</p>
Streams	<p>Site 4: Lacamas Creek flows through the northeast section of the site. See Exhibit 52.</p> <p>Areawide: Lacamas Creek and Spring Branch continues through much of the length of the study area, flowing southeast. See Exhibit 52.</p>
Aquifer Recharge	<p>Site 4: The area is entirely in Category 2 Recharge Areas. See Exhibit 55.</p> <p>Areawide: The area is entirely in Category 2 Recharge Areas. See Exhibit 55.</p>
Geologic Hazards	<p>Site 4: Minimal slopes. Peat soils are present, as are other defined low to moderate liquefaction hazards.</p> <p>Areawide: Same as Site 4.</p>

Site 4 and Areawide Maps

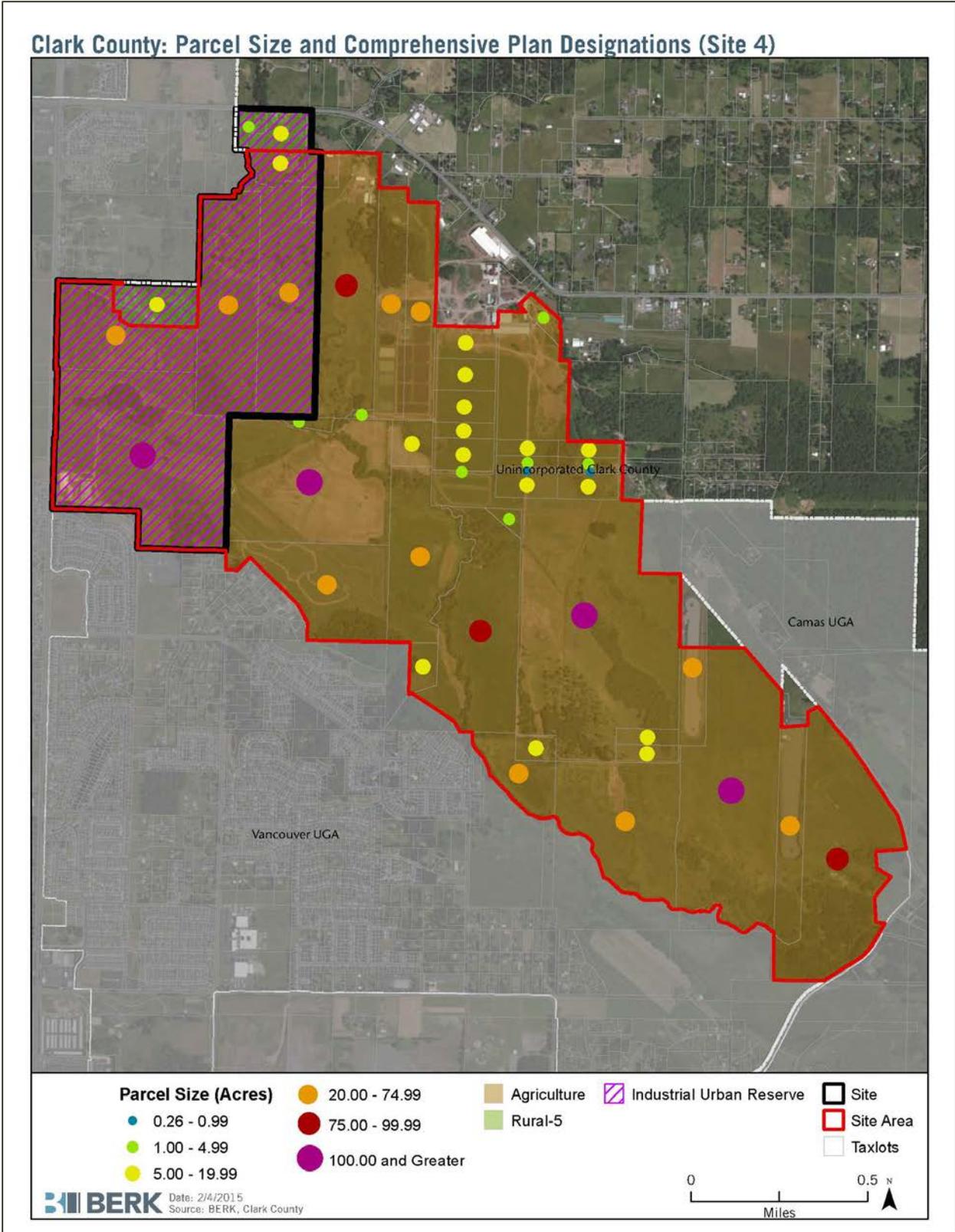
This Section presents maps specific to Site 4 as well as the Areawide Study Area regarding Comprehensive Plan designations, Zoning designations, parcel size, infrastructure, critical areas, soils and capability class, and other relevant topics. These maps are cross-referenced throughout the analysis.

Exhibit 48. Site 4 and Areawide Study Area



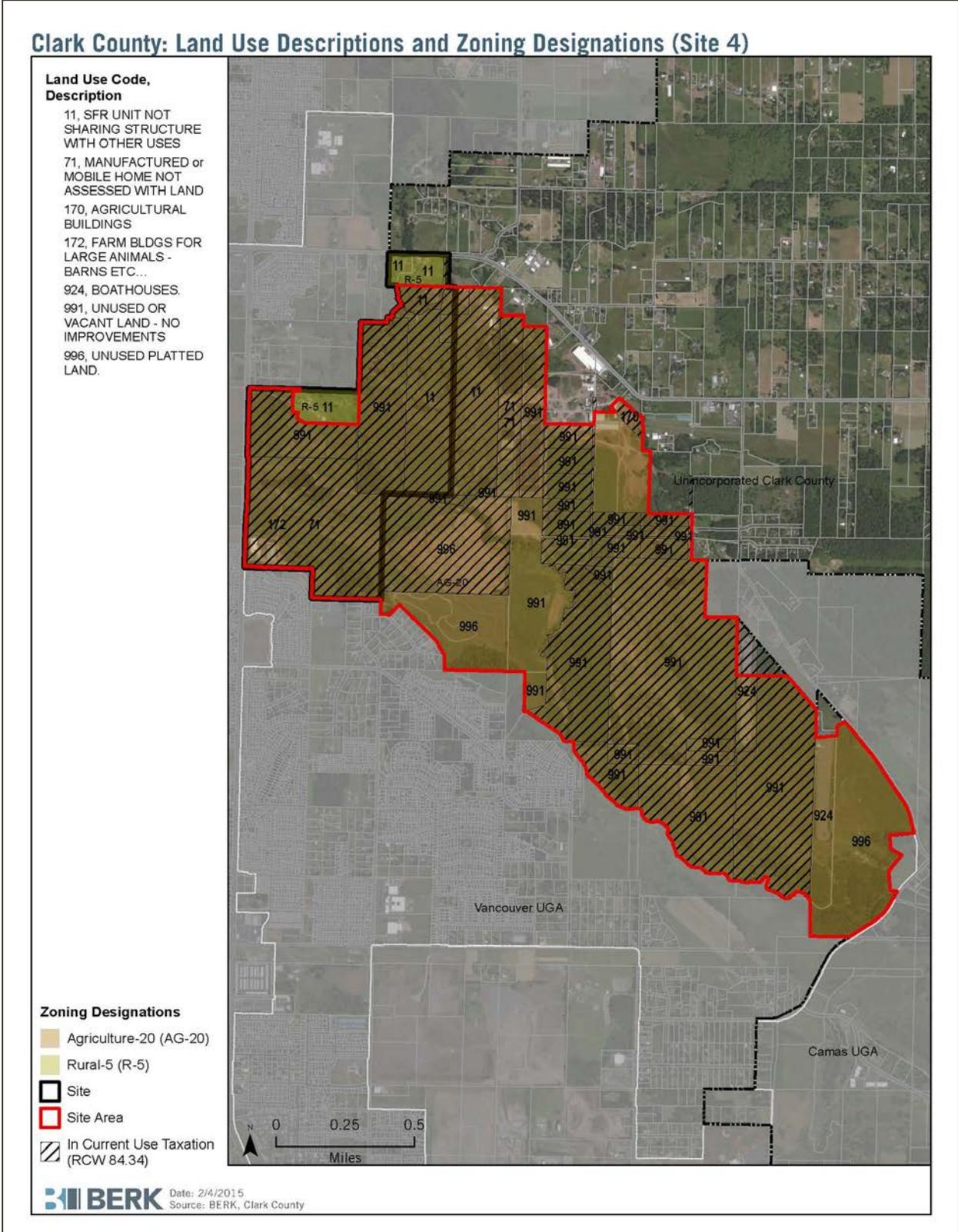
Source: Clark County GIS, BERK Consulting 2015

Exhibit 49. Site 4 and Areawide Comprehensive Plan Designation and Parcel Sizes



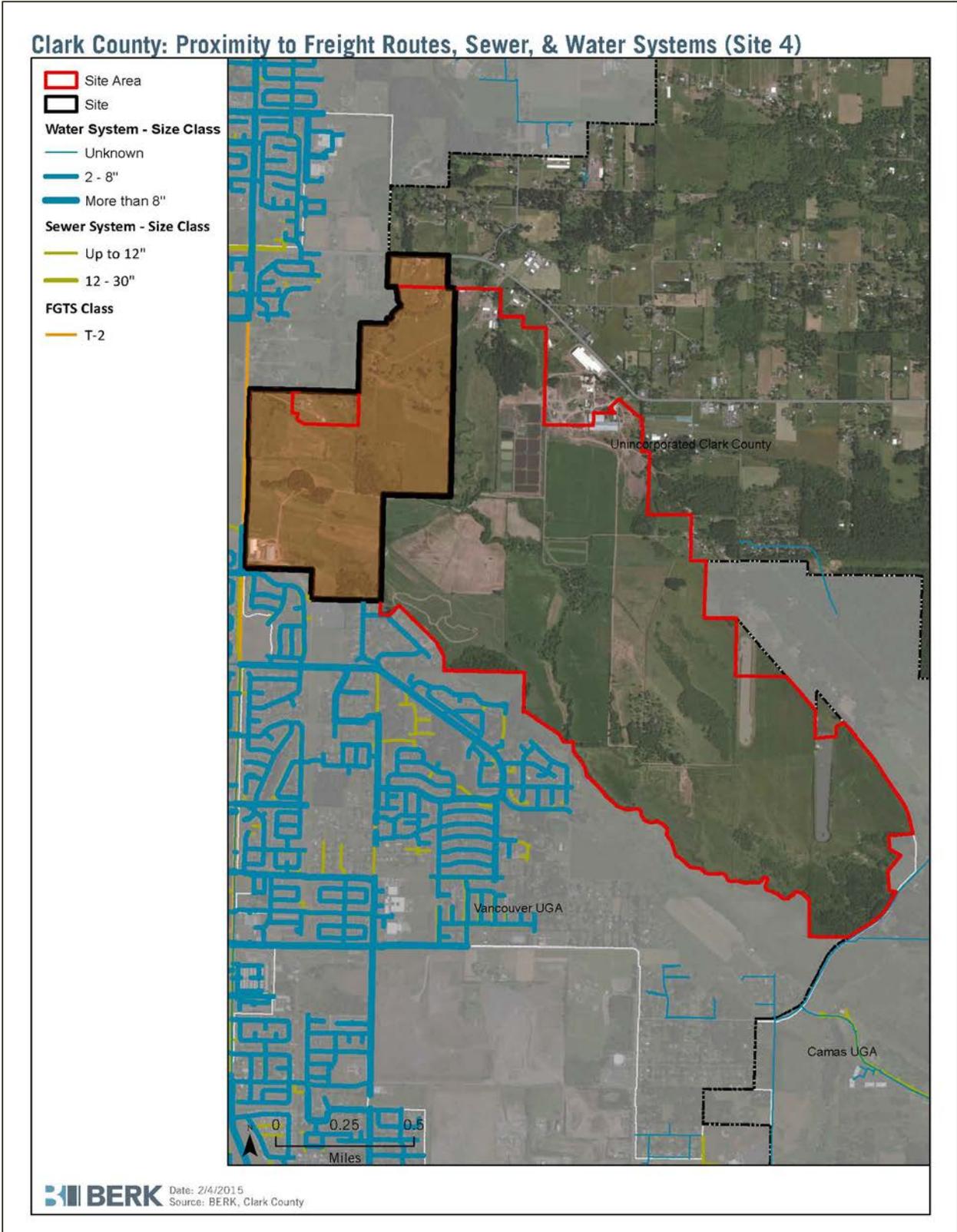
Source: Clark County GIS, BERK Consulting 2015

Exhibit 50. Site 4 and Areawide Current Land Uses and Zoning



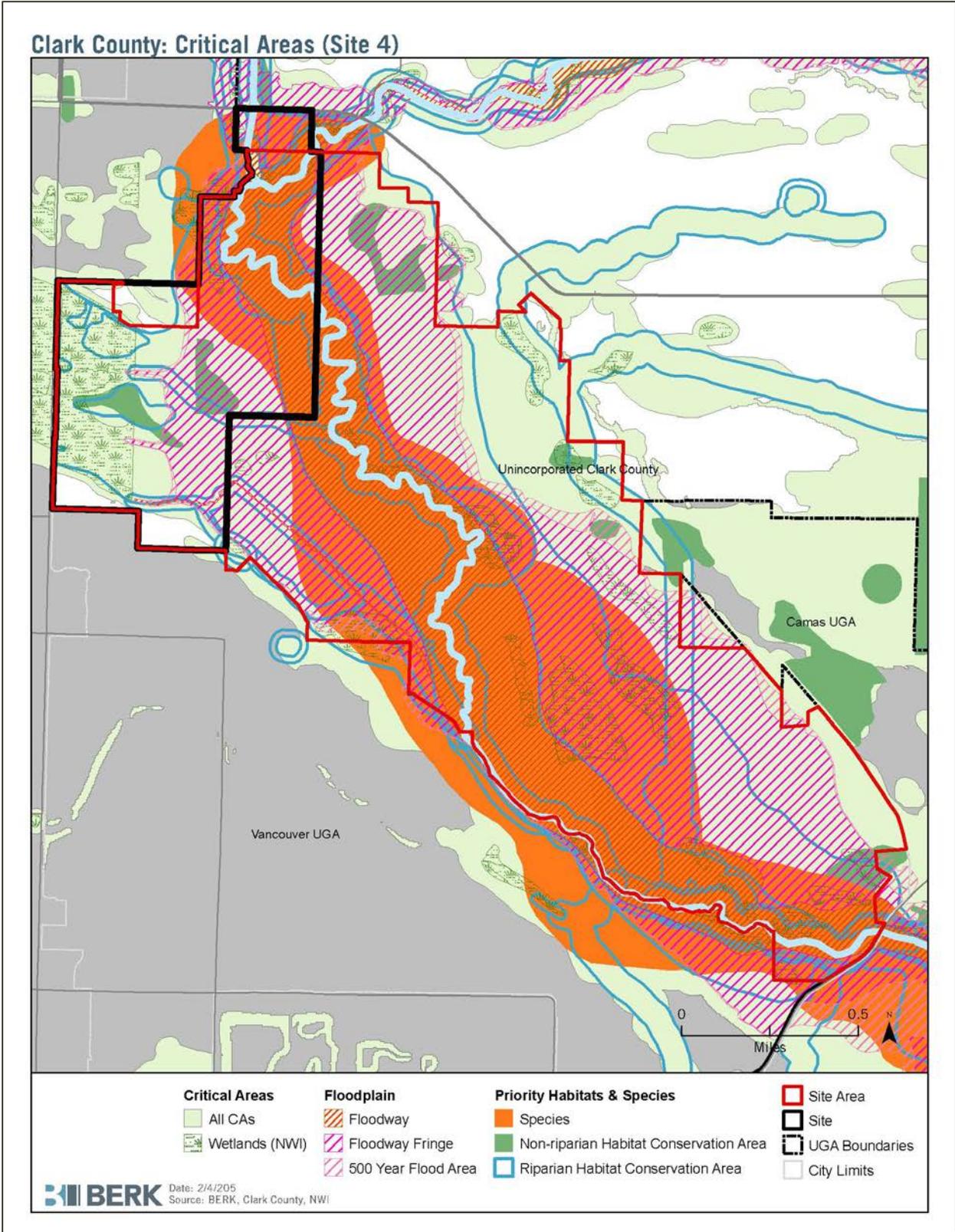
Source: Clark County GIS, BERK Consulting 2015

Exhibit 51. Site 4 and Areawide Proximity of Freight Routes, Water, and Sewer Facilities



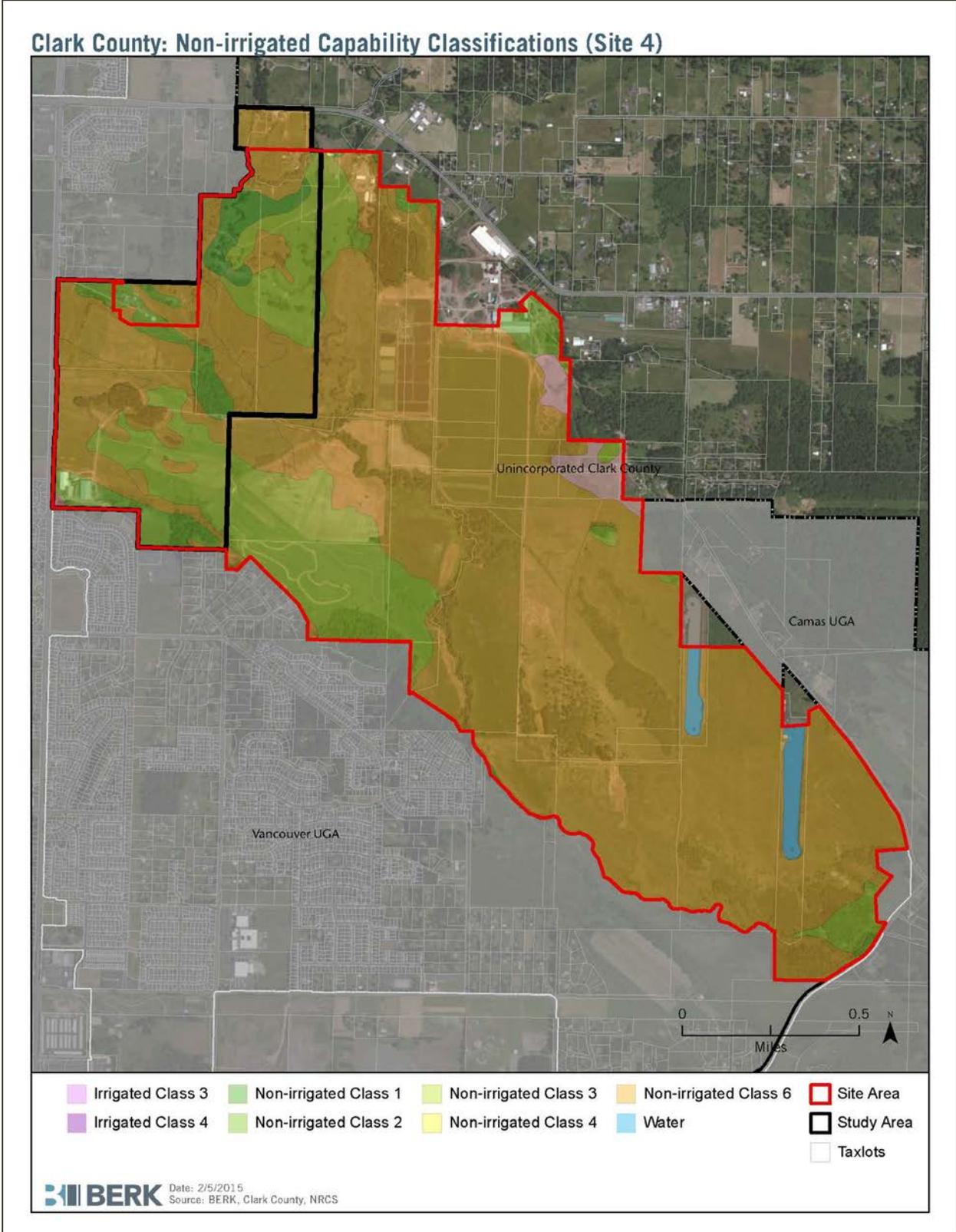
Source: Clark County GIS, BERK Consulting 2015

Exhibit 52. Site 4 and Areawide Mapped Presence of Critical Areas



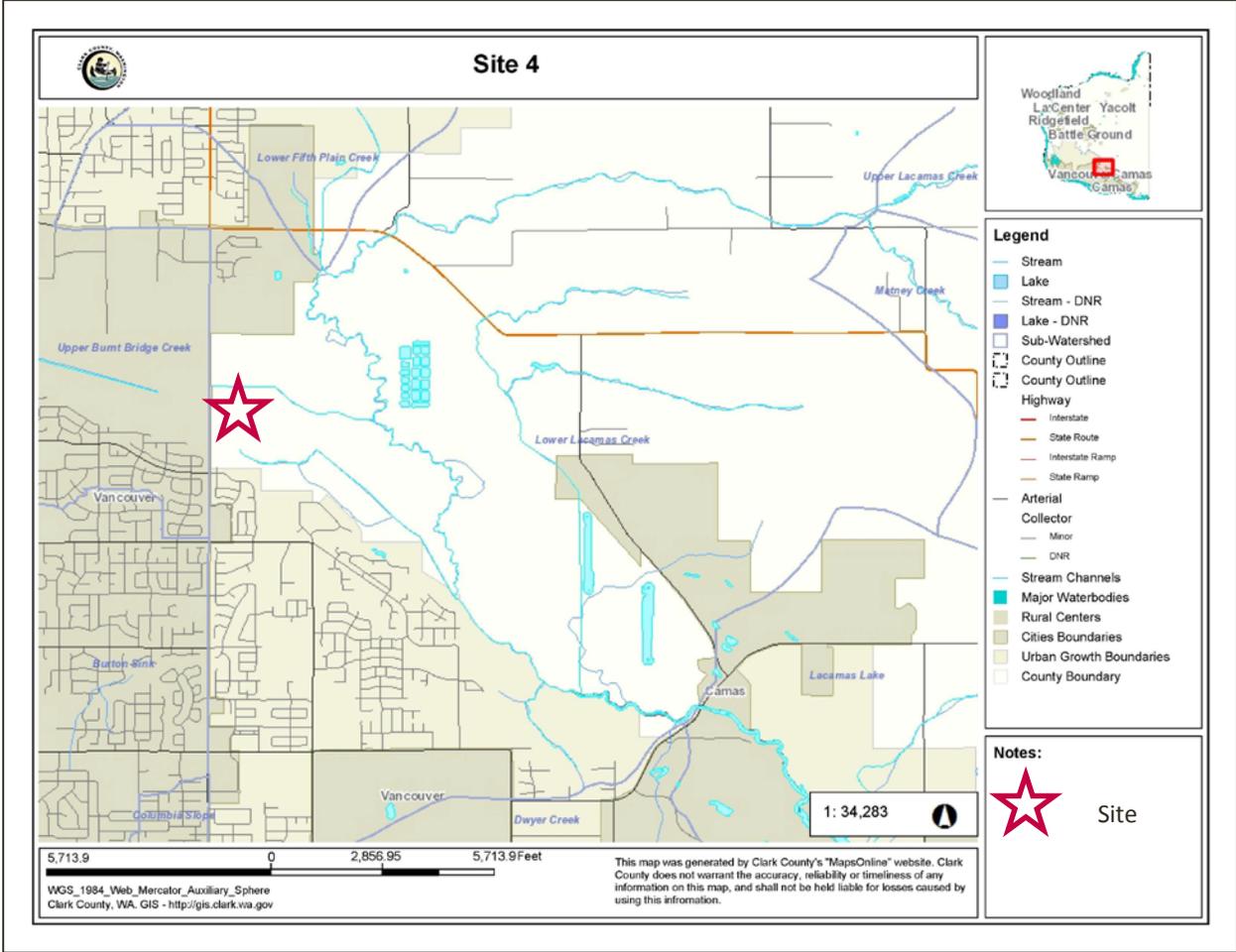
Source: Clark County GIS, BERK Consulting 2015

Exhibit 53. Site 4 and Areawide Docket Soil Capability Classes



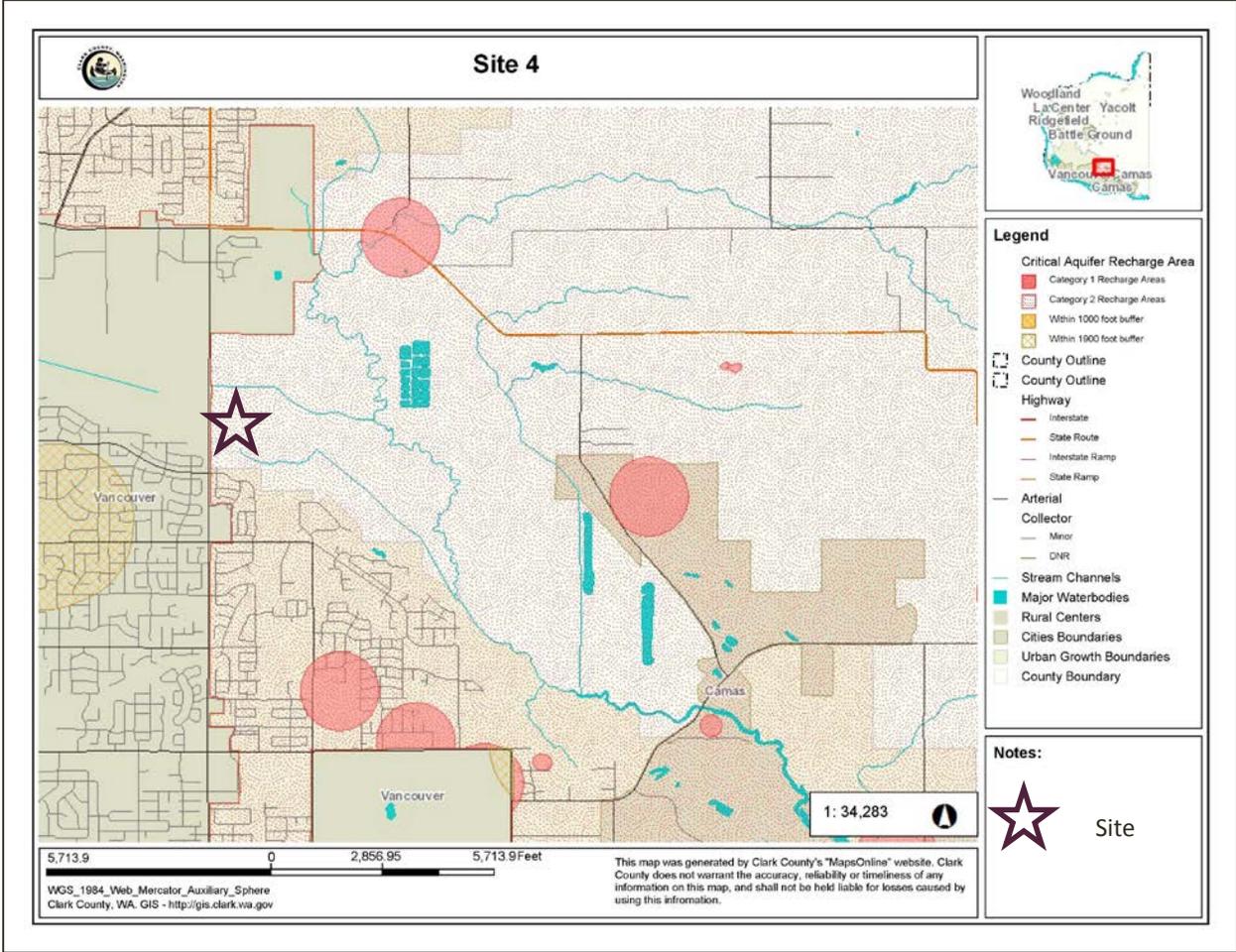
Source: Clark County GIS, BERK Consulting 2015

Exhibit 54. Site 4 and Areawide Vicinity Drainage Basins



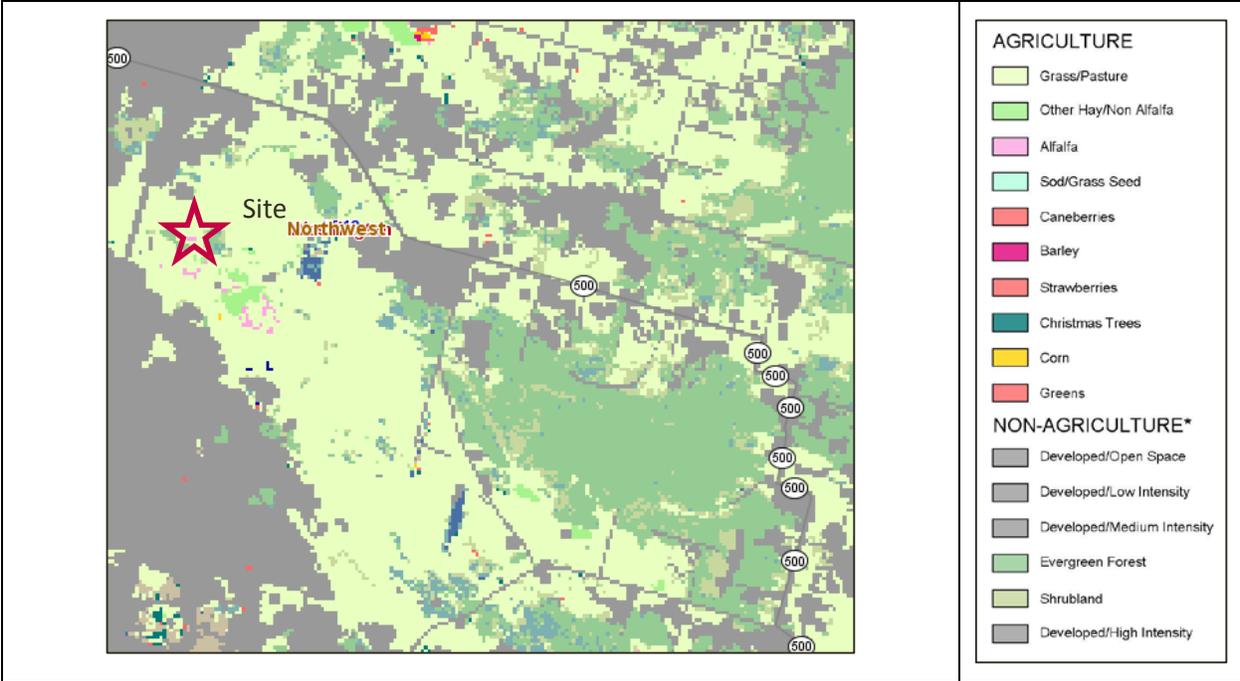
Source: Clark County GIS 2015

Exhibit 55. Site 4 and Areawide Aquifer Classifications in Vicinity



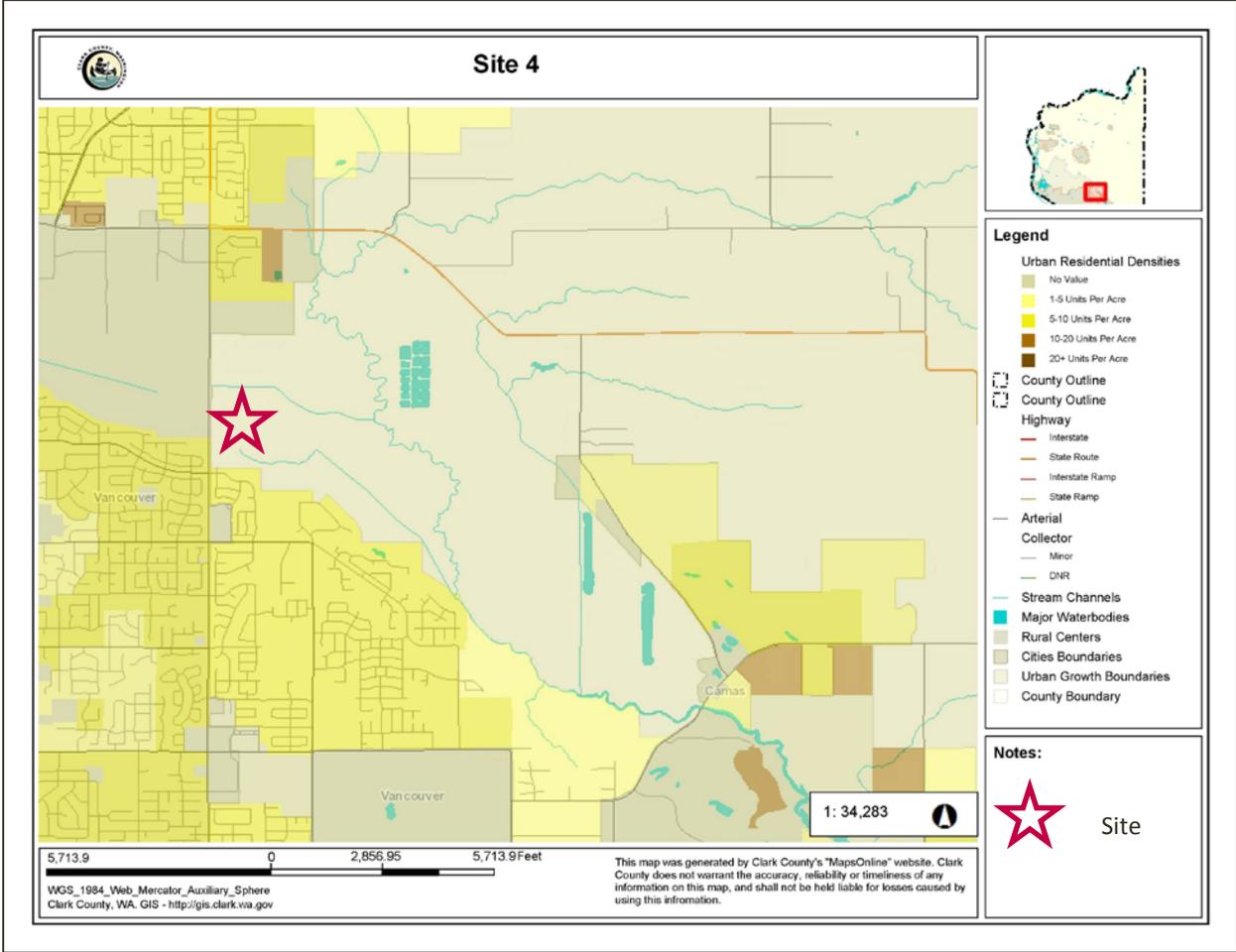
Source: Clark County GIS 2015

Exhibit 56. Site 4 and Areawide USDA CropScape Map



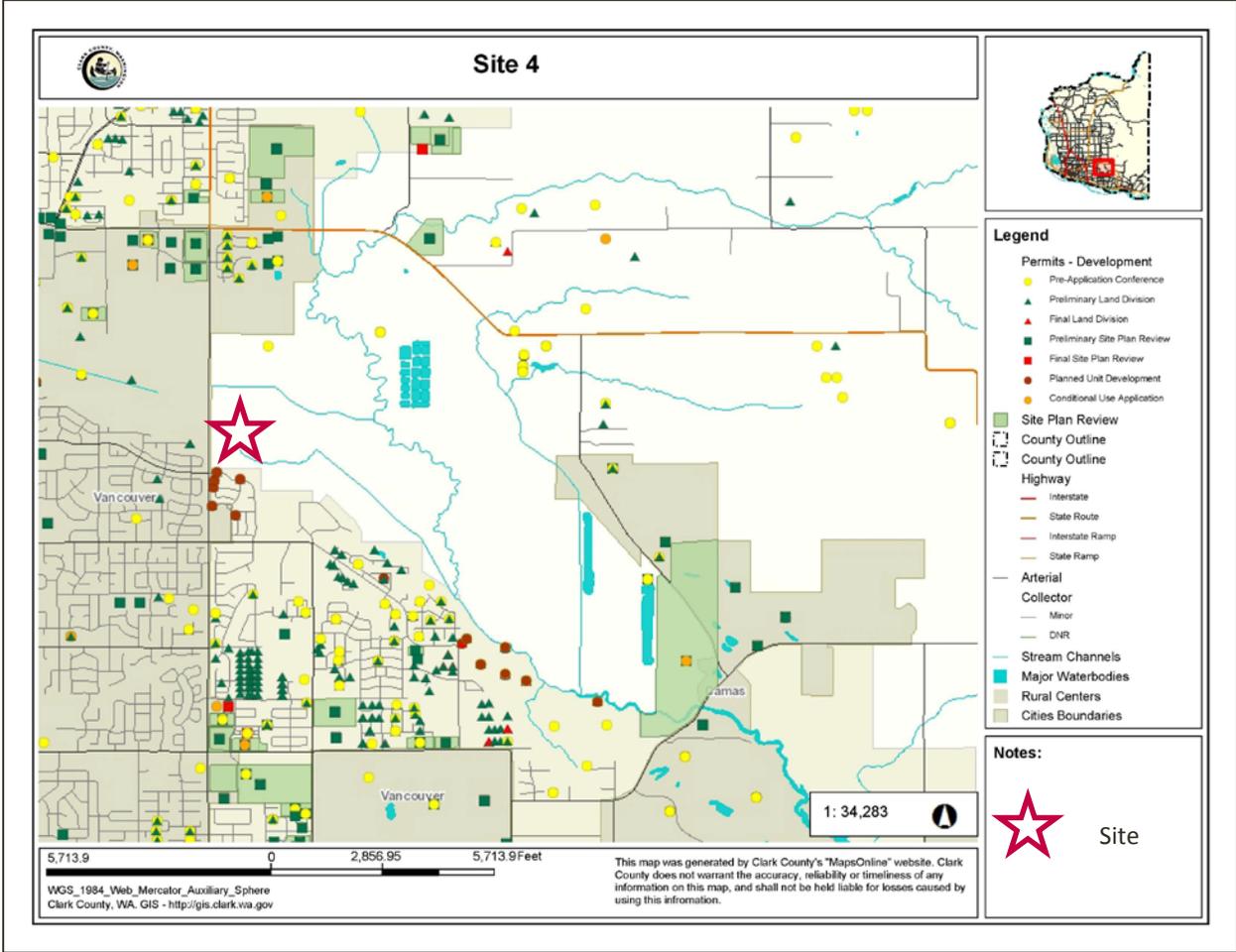
Source: USDA 2014

Exhibit 57. Site 4 and Areawide Nearby Urban Densities



Source: Clark County GIS 2015

Exhibit 58. Site 4 and Areawide Nearby Permit Activity



Source: Clark County GIS 2015

5.3 Agricultural Land Classification Criteria Analysis

GMA requires protection of agricultural, forest, and mineral lands of long-term commercial significance. This section presents a matrix analysis of how Site 4 and the Areawide Study Area compare to the minimum guidelines to classify agricultural lands in WAC 365-190-050; see Exhibit 59. This site was not evaluated in 2007. A summary of the analysis in the matrix is provided in Section 5.4.

Exhibit 59. Matrix: Site 4 and Areawide Study Area Agricultural Land Classification Criteria Analysis

	WAC 365-190-050 Criteria	2015 Analysis: Site 4	2015 Analysis: Site 4 Areawide
A.	(1) In classifying and designating agricultural resource lands, counties must approach the effort as a county-wide or area-wide process. Counties and cities should not review resource lands designations solely on a parcel-by-parcel process. Counties and cities must have a program for the transfer or purchase of development rights prior to designating agricultural resource lands in urban growth areas. Cities are encouraged to coordinate their agricultural resource lands designations with their county and any adjacent jurisdictions.	Areawide analysis is being prepared for four RILB inventory sites including Site 4. See right.	The areawide study area includes Agricultural designations between the UGAs of Camas and Vancouver, including areas abutting Site 4 and generally continuing south and southwest until another non-Agricultural designation abuts. See Exhibit 48.
B.	2) Once lands are designated, counties and cities planning under the act must adopt development regulations that assure the conservation of agricultural resource lands. Recommendations for those regulations are found in WAC 365-196-815.	The County has adopted development regulations to conserve agricultural resource lands.	The County has adopted development regulations to conserve agricultural resource lands.
C.	(3) Lands should be considered for designation as agricultural resource lands based on three factors:		
D.	(a) The land is not already characterized by urban growth. To evaluate this factor, counties and cities should use the criteria contained in WAC 365-196-310.	The Site 4 study area parcels range from 1 to 100 acres or greater. The parcels are in dairy and other agricultural or rural residential use.	The Site 4 areawide parcels range from 0.26 to 100 acres or greater. Majority of study area is within parcels ranging in size from 20-100 acres or greater.
E.	(b) The land is used or capable of being used for agricultural production. This factor evaluates whether lands are well suited to agricultural use based primarily on their physical and geographic characteristics. Some agricultural operations are less	The site is in use as a dairy operation and all AG-20 zoned parcels are in current use taxation. NRCS soil data shows 30% of the site is prime farmland and 29% is prime farmland if drained. The soil capability classes include Classes 1-3 (about 42% cumulatively) and Class 6 (the	Much of the study area is in current use taxation for agriculture. NRCS soil information shows 10% is prime farmland soil and 20% is prime farmland if drained; the majority is not prime farmland. Most of the soils are considered Class 6 (76%).

<u>WAC 365-190-050 Criteria</u>	2015 Analysis: Site 4	2015 Analysis: Site 4 Areawide																																				
dependent on soil quality than others, including some livestock production operations.	majority at 58%). Some is considered to have limitations depending on whether the land is drained or due to other limiting factors. See soil information in Appendix A. The site is in Lower Lacamas Creek basin. There are stormwater management facilities in roads abutting the site.	Stormwater characteristics are similar as for Site 4, with more rural stormwater management to the east.																																				
F. (i) Lands that are currently used for agricultural production and lands that are capable of such use must be evaluated for designation. The intent of a landowner to use land for agriculture or to cease such use is not the controlling factor in determining if land is used or capable of being used for agricultural production. Land enrolled in federal conservation reserve programs is recommended for designation based on previous agricultural use, management requirements, and potential for reuse as agricultural land.	The site is used for agriculture purposes as a dairy; some property is used for residential purposes.	Based on current use taxation records much of the land is used for agriculture. USDA Crop Scape data shows pasture/silage as the primary agricultural activity.																																				
G. (ii) In determining whether lands are used or capable of being used for agricultural production, counties and cities shall use the land-capability classification system of the United States Department of Agriculture Natural Resources Conservation Service as defined in relevant Field Office Technical Guides. These eight classes are incorporated by the United States Department of Agriculture into map units described in published soil surveys, and are based on the growing capacity, productivity and soil composition of the land	<p>The study area contains non-irrigated Class 1, 2, 3 and 6 soils. Most soils are Class 6.</p> <table border="0" style="width: 100%;"> <tr><td>Class 1</td><td style="text-align: right;">5%</td></tr> <tr><td>Class 2</td><td style="text-align: right;">13%</td></tr> <tr><td>Class 3</td><td style="text-align: right;">24%</td></tr> <tr><td>Class 4</td><td style="text-align: right;">0%</td></tr> <tr><td>Class 5</td><td style="text-align: right;">0%</td></tr> <tr><td>Class 6</td><td style="text-align: right;">58%</td></tr> <tr><td>Class 7</td><td style="text-align: right;">0%</td></tr> <tr><td>Water</td><td style="text-align: right;">0%</td></tr> <tr><td>Total</td><td style="text-align: right;">100.0%</td></tr> </table> <p>According to the NRCS, capability levels are high or moderate for Class 1 and 2 soils and limited for Class 3, and in particular for Classes 4- 6. Class 1 soils have few limitations that restrict their use.</p>	Class 1	5%	Class 2	13%	Class 3	24%	Class 4	0%	Class 5	0%	Class 6	58%	Class 7	0%	Water	0%	Total	100.0%	<p>The areawide information shows that the area contains non-irrigated Class 1, 2, 3 and 6 soils; mostly Class 6. See Site 4 and Appendix A for description.</p> <table border="0" style="width: 100%;"> <tr><td>Class 1</td><td style="text-align: right;">1%</td></tr> <tr><td>Class 2</td><td style="text-align: right;">4%</td></tr> <tr><td>Class 3</td><td style="text-align: right;">17%</td></tr> <tr><td>Class 4</td><td style="text-align: right;">0%</td></tr> <tr><td>Class 5</td><td style="text-align: right;">0%</td></tr> <tr><td>Class 6</td><td style="text-align: right;">76%</td></tr> <tr><td>Class 7</td><td style="text-align: right;">0%</td></tr> <tr><td>Water</td><td style="text-align: right;">1%</td></tr> <tr><td>Total</td><td style="text-align: right;">100.0%</td></tr> </table>	Class 1	1%	Class 2	4%	Class 3	17%	Class 4	0%	Class 5	0%	Class 6	76%	Class 7	0%	Water	1%	Total	100.0%
Class 1	5%																																					
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Total	100.0%																																					
Class 1	1%																																					
Class 2	4%																																					
Class 3	17%																																					
Class 4	0%																																					
Class 5	0%																																					
Class 6	76%																																					
Class 7	0%																																					
Water	1%																																					
Total	100.0%																																					

	WAC 365-190-050 Criteria	2015 Analysis: Site 4	2015 Analysis: Site 4 Areawide
		<p>Class 2 soils have moderate limitations that reduce the choice of plants or that require moderate conservation practices.</p> <p>Class 3 soils have severe limitations that reduce the choice of plants or that require special conservation practices, or both.</p> <p>Class 6 soils have severe limitations that make them generally unsuitable for cultivation and that restrict their use mainly to pasture, rangeland, forestland, or wildlife habitat.</p>	
H.	(c) The land has long-term commercial significance for agriculture. In determining this factor, counties and cities should consider the following nonexclusive criteria, as applicable:		
I.	(i) The classification of prime and unique farmland soils as mapped by the Natural Resources Conservation Service;	About 30% of soils are considered prime farmland and 29% is considered prime farmland if drained.	About 10% of soils are considered prime farmland and 20% are prime farmland if drained. Most soils are not prime farmland (69%).
J.	(ii) The availability of public facilities, including roads used in transporting agricultural products	SR 500 is on the northern border of the site, and NE 162 nd is a state designated freight route along the western border. Sewer and water lines are available on NE 162 nd Street. See Exhibit 51	Aside from sewer and water available along Site 4 there is no major water or sewer system infrastructure within the study area. See Exhibit 51.
K.	(iii) Tax status, including whether lands are enrolled under the current use tax assessment under chapter 84.34 RCW and whether the optional public benefit rating system is used locally, and whether there is the ability to purchase or transfer land development rights;	A majority of the subject property is in the agricultural current use taxation program. Some rural zoned lands with homes are not in the program.	A majority of the parcels in the study area are in current use taxation.
L.	(iv) The availability of public services;	The site is served by Fire District 5. It lies in Drainage District 7. The Evergreen School District serves the site. The site is patrolled by the Clark County Sheriff's Office central district.	Same as for Site 4.
M.	(v) Relationship or proximity to urban growth areas;	The site is adjacent to the Vancouver UGA on its western and southern borders.	The study area is adjacent to the Vancouver UGA on its southwestern border and is also adjacent to the Camas UGA on its southeastern border.

	WAC 365-190-050 Criteria	2015 Analysis: Site 4	2015 Analysis: Site 4 Areawide
N.	(vi) Predominant parcel size;	The property contains parcels of 1 to 100 acres or greater.	The property contains parcels of 0.26 to 100 acres or greater. Only 2 parcels range in size from 0.26 to 1 acre.
O.	(vii) Land use settlement patterns and their compatibility with agricultural practices;	The property is generally open in character, except for the agricultural related buildings and homes. UGA territory is to the south, west and northwest.	The study area is generally open and has few agricultural and residential structures. Structures are concentrated in the southeast section of the study area. UGA territory is to the southwest, south and southeast.
P.	(viii) Intensity of nearby land uses;	Urban densities vary but are typically 5-10 units per acre. Some mixed use zoning abuts to the north. See Exhibit 48 and Exhibit 57.	Land uses to the west are the same as for the Site 4. Densities to the east range from 1-20 units per acre.
Q.	(ix) History of land development permits issued nearby;	Most permit activity has occurred in areas abutting and near to the site in the Vancouver UGA. Within the study area a portion was studied for inclusion in the UGA in the past.	Same as for Site 4.
R.	(x) Land values under alternative uses; and	The dairy is in current use taxation. Property with the dairy has \$0 taxable land value and is taxed on the building value. Other land is discounted at just over 10% of value, such as: Market Value \$238,788.00 Taxable Value \$28,966.00	Similar discounted values are found in the rest of the study area. An example includes: Market Value \$526,083.00 Taxable Value \$55,255.00
S.	(xi) Proximity to markets.	Adjacent to the Vancouver UGA.	Adjacent to the Vancouver and Camas UGAs.
T.	(4) When designating agricultural resource lands, counties and cities may consider food security issues, which may include providing local food supplies for food banks, schools and institutions, vocational training opportunities in agricultural operations, and preserving heritage or artisanal foods.	See Exhibit 17 Row T for analysis relevant to the dairy operation. The property is owned by Andersen Dairy, based in Battle Ground. Their milk and other dairy products are sold throughout the Pacific Northwest as described by the company's website: https://andersendairy.com/ANDERSEN_DAIRY.php	See Exhibit 17 Row T for analysis relevant to the area.
U.	(5) When applying the criteria in subsection (3)(c) of this section, the process should result in designating an amount of agricultural resource lands sufficient to maintain and enhance the economic viability of the agricultural industry in the county over the long term; and to retain supporting agricultural	See Exhibit 17 Row U for analysis relevant to the dairy operation.	See Exhibit 17 Row U for analysis relevant to the area.

	<u>WAC 365-190-050 Criteria</u>	2015 Analysis: Site 4	2015 Analysis: Site 4 Areawide
	businesses, such as processors, farm suppliers, and equipment maintenance and repair facilities.		
V.	<p>(6) Counties and cities may further classify additional agricultural lands of local importance. Classifying additional agricultural lands of local importance should include, in addition to general public involvement, consultation with the board of the local conservation district and the local committee of the farm service agency. It may also be useful to consult with any existing local organizations marketing or using local produce, including the boards of local farmers markets, school districts, other large institutions, such as hospitals, correctional facilities, or existing food cooperatives.</p> <p>These additional lands may include designated critical areas, such as bogs used to grow cranberries or farmed wetlands. Where these lands are also designated critical areas, counties and cities planning under the act must weigh the compatibility of adjacent land uses and development with the continuing need to protect the functions and values of critical areas and ecosystems.</p>	The County has not designated agricultural land of local importance. This is an optional policy choice.	Same as for Site 4.

5.4 Summary and Conclusion

Site 4

Site 4 is zoned and used for agriculture and is in current use taxation. The dairy is part of a long-standing commercial operation based in Battle Ground WA. The property is large in the County's range of agricultural properties but is extensively constrained by critical areas. The long-term trend is of decline in large and mid-size operations, and rather an increase in small farms oriented to the urban, local food movement.

The agricultural market is showing an increase in small value added production and direct sales, CSAs, and other newer local food trends. The dairy sells products all over the Pacific Northwest based on their website.

The subject sites are in proximity of urban uses at urban densities, with urban services including water and sewer. A school district serves the site but do not abut the site. Fire protection is by special district and police protection would remain with the Clark County Sheriff. There has been recent permit activity in the Vancouver UGA. Major roads serve the site and primarily serve urban traffic.

Subject sites are under current use taxation, and thus the effect of growth pressures is not felt fiscally. The value of the land under urban uses would be greater.

The RILB Inventory (BERK Consulting et al. September 2015, under separate cover) shows the property meets screening criteria to be considered a RILB.

Areawide

Site 4 is 366 acres or about 24% of the areawide acreage of 1,532 acres. If Site 4 were removed from the AG-20 designation, about 75% of the areawide study area would remain in AG-20 zoning. The area is already bounded by urban land in Vancouver and Camas UGAs, and the AG designation is already isolated from other locations. However, given the extensive critical areas and the lack of likelihood that the area could be urbanized, low intensity agricultural use is appropriate.

Within the study area, the uses are typically agriculture with few residential lots.

The removal of the Site 4 properties from the areawide acreage would continue the decline in large and mid-size operations, and would remove some of the larger parcels in the County's AG-20 inventory, and would reduce areawide acres but likely would not change the use pattern of the rest of the highly constrained floodplain. This trend would likely continue with or without the Site 4 properties, and the trend towards small farms would likely continue.

As with Site 4, the areawide study area lies in proximity of urban uses at urban densities, with urban services including water and sewer, particularly from the Vancouver UGA. Emergency services are provided by two fire districts and the Clark County Sheriff and these would continue in any case. There has been recent permit activity regarding commercial and residential uses encircling the study area. The volume of traffic is based on urban use abutting the site.

Most of the area is in current use taxation, and it is likely the value of the land for urban uses would be higher than for the use under agriculture but would continue to reflect constraints.

APPENDIX A. NRCS SOIL INFORMATION

Land capability classification shows, in a general way, the suitability of soils for most kinds of field crops. Crops that require special management are excluded. The soils are grouped according to their limitations for field crops, the risk of damage if they are used for crops, and the way they respond to management. The criteria used in grouping the soils do not include major and generally expensive landforming that would change slope, depth, or other characteristics of the soils, nor do they include possible but unlikely major reclamation projects. Capability classification is not a substitute for interpretations that show suitability and limitations of groups of soils for rangeland, for woodland, or for engineering purposes.

In the capability system, soils are generally grouped at three levels-capability class, subclass, and unit. Only class and subclass are included in this data set.

Capability classes, the broadest groups, are designated by the numbers 1 through 8. The numbers indicate progressively greater limitations and narrower choices for practical use. The classes are defined as follows:

Class 1 soils have few limitations that restrict their use.

Class 2 soils have moderate limitations that reduce the choice of plants or that require moderate conservation practices.

Class 3 soils have severe limitations that reduce the choice of plants or that require special conservation practices, or both.

Class 4 soils have very severe limitations that reduce the choice of plants or that require very careful management, or both.

Class 5 soils are subject to little or no erosion but have other limitations, impractical to remove, that restrict their use mainly to pasture, rangeland, forestland, or wildlife habitat.

Class 6 soils have severe limitations that make them generally unsuitable for cultivation and that restrict their use mainly to pasture, rangeland, forestland, or wildlife habitat.

Class 7 soils have very severe limitations that make them unsuitable for cultivation and that restrict their use mainly to grazing, forestland, or wildlife habitat.

Class 8 soils and miscellaneous areas have limitations that preclude commercial plant production and that restrict their use to recreational purposes, wildlife habitat, watershed, or esthetic purposes.

Farmland classification identifies map units as prime farmland, farmland of statewide importance, farmland of local importance, or unique farmland. It identifies the location and extent of the soils that are best suited to food, feed, fiber, forage, and oilseed crops. NRCS policy and procedures on prime and unique farmlands are published in the "Federal Register," Vol. 43, No. 21, January 31, 1978.

Soil Names, Classifications, Rural Industrial Land Bank Inventory Sites: Areas 1 through 4												
Soil Name	Farmland Classification	Non-irrigated Classification	Irrigated Classification	Area 1		Area 2		Areas 3		Area 4		Total
				Site Specific	Total Area							
Cove silty clay loam, 0 to 3 percent slopes	Not prime farmland	Non-irrigated Class 6	-	2.37	146.83	11.34	94.71	3.47	28.24	133.04	1,023.74	1,293.52
Cove silty clay loam, thin solum, 0 to 3 percent slopes	Not prime farmland	Non-irrigated Class 6	-	0.19	67.75					16.88	16.88	84.63
Dollar loam, 0 to 5 percent slopes	All areas are prime farmland	Non-irrigated Class 3	-	162.79	1,084.17					44.90	68.61	1,152.78
Gee silt loam, 0 to 8 percent slopes	All areas are prime farmland	Non-irrigated Class 3	-			132.79	435.71	363.93	950.91			1,386.62
Gee silt loam, 20 to 30 percent slopes	Not prime farmland	Non-irrigated Class 4	-			4.60	29.42	60.49	109.10			138.53
Gee silt loam, 30 to 60 percent slopes	Not prime farmland	Non-irrigated Class 7	-			22.76	48.47		52.98			101.45
Gee silt loam, 8 to 20 percent slopes	Farmland of statewide importance	Non-irrigated Class 3	-			76.40	117.91	31.26	309.27			427.18
Hesson clay loam, 0 to 8 percent slopes	All areas are prime farmland	Non-irrigated Class 2	-								17.52	17.52
Hesson clay loam, 8 to 20 percent slopes	Farmland of statewide importance	Non-irrigated Class 3	-								2.83	2.83
Hesson gravelly clay loam, 0 to 8 percent slopes	All areas are prime farmland	Non-irrigated Class 2	-							23.11	24.09	24.09
Hillsboro loam, 15 to 20 percent slopes	Not prime farmland	Non-irrigated Class 4	-		2.04							2.04
Hillsboro loam, 20 to 30 percent slopes	Not prime farmland	Non-irrigated Class 4	-		1.18							1.18
Hillsboro loam, 3 to 8 percent slopes	All areas are prime farmland	Non-irrigated Class 2	-	56.78	483.02							483.02
Hillsboro loam, 30 to 50 percent slopes	Not prime farmland	Non-irrigated Class 7	-		1.73							1.73
Hillsboro loam, 8 to 15 percent slopes	Farmland of statewide importance	Non-irrigated Class 3	-		117.62							117.62
Hillsboro silt loam, 0 to 3 percent slopes	All areas are prime farmland	Non-irrigated Class 1	-	236.37	582.21		15.96	10.41	20.48	19.19	19.54	638.20
Hillsboro silt loam, 3 to 8 percent slopes	All areas are prime farmland	Non-irrigated Class 2	-			1.16	24.40	42.62	42.65			67.05
Hillsboro silt loam, 8 to 15 percent slopes	Farmland of statewide importance	Non-irrigated Class 3	-			10.43	56.92	61.40	115.30			172.22
Hockinson loam, 0 to 3 percent slopes	Prime farmland if drained	Non-irrigated Class 6	-		2.17						24.31	26.48
Lauren gravelly loam, 0 to 8 percent slopes	All areas are prime farmland	Non-irrigated Class 2	-	0.28	0.99					13.94	15.30	16.29
Lauren gravelly loam, cemented substratum, 3 to 15 percent slopes	Farmland of statewide importance	Non-irrigated Class 3	-								13.45	13.45
Lauren very gravelly loam, 0 to 8 percent slopes	Farmland of statewide importance	Non-irrigated Class 4	Irrigated Class 4							0.72	0.73	0.73
McBee silt loam, coarse variant, 0 to 3 percent slopes	Prime farmland if drained	Non-irrigated Class 6	-	106.59	506.35					7.22	7.22	513.57
Miscellaneous Water	Not prime farmland	Water	-								18.72	18.72
Odne silt loam, 0 to 5 percent slopes	Not prime farmland	Non-irrigated Class 6	-			68.18	145.43	156.84	375.45			520.88
Powell silt loam, 0 to 8 percent slopes	Prime farmland if drained	Non-irrigated Class 3	Irrigated Class 3								21.55	21.55
Puyallup fine sandy loam, 0 to 3 percent slopes	All areas are prime farmland	Non-irrigated Class 3	Irrigated Class 3			4.14	6.50					6.50
Sara silt loam, 0 to 8 percent slopes	Prime farmland if drained	Non-irrigated Class 4	-			45.22	253.17	31.63	72.19			325.37
Sara silt loam, 30 to 50 percent slopes	Not prime farmland	Non-irrigated Class 7	-			19.43	44.43		1.40			45.83
Sara silt loam, 8 to 20 percent slopes	Not prime farmland	Non-irrigated Class 4	-			15.11	26.52		28.33			54.85
Semiahmoo muck	Prime farmland if drained	Non-irrigated Class 3	-	6.55	17.88					43.26	161.58	179.46
Semiahmoo muck, shallow variant	Prime farmland if drained	Non-irrigated Class 6	-	23.51	175.89					53.98	69.35	245.24
Tisch silt loam, 0 to 3 percent slopes	Prime farmland if drained	Non-irrigated Class 6	-								17.15	17.15
Washougal gravelly loam, 0 to 8 percent slopes	All areas are prime farmland	Non-irrigated Class 2	-				14.12			10.08	10.08	24.20
Water	Not prime farmland	Water	-	5.98	5.98		5.02	1.59	2.77			13.78
Wind River gravelly loam, 0 to 8 percent slopes	All areas are prime farmland	Non-irrigated Class 2	-		0.15							0.15
Total				601.41	3,195.96	411.55	1,318.72	763.64	2,109.08	366.32	1,532.64	8,156.40

APPENDIX B. SITE 1 (DOCKET) CRITICAL AREAS REPORT, ANCHOR QEA

See Alternative Sites Analysis Appendix C

