

Date: June 13, 2016
To: Lewis County Planning Commission
From: Fred Evander, Senior Long Range Planner, Lewis County
RE: **MSC 2015-0167 DOUGLAS REZONE APPLICATION**
Attachments: A. Rezone Application (10 pages)
B. Soil Information Submitted by Applicant (9 pages)
C. Zoning Map for Subject Property (1 Page)
D. Prime Agricultural Map for Subject Property (1 Page)
E. Natural Resources Conservation Service Map Packet (5 Pages)

The purpose of this staff report is to introduce a Comprehensive Plan and Rezone request for a 37.22 acre parcel at 536 Brown Road (Parcel Number 017984001002).

SUMMARY OF REQUEST

This request was submitted by Annie Douglas and Keith Mohoric and seeks two separate amendments:

- Changing the Lewis County Comprehensive Plan – This amendment would change the Comprehensive Plan Future Land Use designation of the parcel from Agricultural Resource Land to Rural.
- Changing the Zoning Map – The amendment would also change the zoning of the parcel from Agricultural Resource Land to Rural Development District – One Dwelling Unit per Five Acres (RDD-5).

The applicants have argued that this change is warranted due to two primary reasons: the available land area is not large enough to be commercially viable due to current structures, topography and streams; and soil type does not allow the growing of a crop type that would be commercially viable (see Attachment B, page 6). The applicants also maintain that a variety of provisions within the Growth Management Act support the proposed Comprehensive Plan and zoning change (see the responses in Attachment A).

CRITERIA TO EVALUATE REQUEST

The relevant criteria to evaluate this request are provided within the Lewis County Comprehensive Plan and the zoning code. The policies in the Comprehensive Plan provide the general criteria for the overall designation of agricultural resource lands, and the criteria in the zoning code offer steps to remedy incorrect designations of the lands. Both of these criteria are reproduced below:

Comprehensive Plan Criteria (for Agricultural Lands)

Policy NR 1.3 Designate agricultural lands of long-term commercial significance as follows:

1. Identify lands that are primarily devoted to the commercial production of agricultural products enumerated in RCW 36.70A.030(2) of the Growth Management Act.

2. Identify lands that are classified as having prime farmland soils as determined by the National Resource Conservation Service (NRCS) that occupy a significant partition of the parcel. Prime farmland soils include soils classified by NRCS as “prime farmland,” Prime farmland if drained,” “prime farmland if drained and either protected from flooding or not frequently flooded during the growing season,” and “prime farmland if irrigated.” (NRCS maintains a list of soil mapping units that meet the criteria for prime farmland. 7CFR 657.4).
3. Lands with soils that are classified by NRCS as “prime farmland if drained” or “prime farmland if irrigated” are presumed to be drained or irrigated in the absence of evidence to the contrary;
4. Identify lands that have non-soil dependent agricultural uses such as poultry, Christmas tree, horticulture, and fish hatchery operations;
5. Consider the combined effects of proximity to population areas and the possibility of more intense uses of the land as indicated by:
 - (a) The availability of public facilities;
 - (b) Tax status;
 - (c) The availability of public services
 - (d) Relationship or proximity to urban areas;
 - (e) Predominant parcel size (20 acres is considered a suitable predominant parcel size for commercial agriculture);
 - (f) Land use settlement patterns and their compatibility with agricultural practices;
 - (g) Intensity of nearby land uses;
 - (h) History of land development permits issued nearby;
 - (i) Land values under alternative uses; and
 - (j) Proximity of markets.

Zoning Code Criteria

17.30.600 Relief from errors in ARL designation.

1. Property owners who believe a parcel has been included in agricultural resource land in error may request redesignation of that parcel pursuant to the comprehensive plan amendment provisions of LCC 17.165.040.
2. Property owners who claim a parcel was included in agricultural resource land in error due to incorrect mapping of prime soils, as listed in the land use element of the comprehensive plan, shall provide a written report by a certified soils scientist documenting the actual soils conditions on the parcel. The application fee for a comprehensive plan amendment set by LCC 17.165.020 shall be waived for property owners submitting a request for redesignation under this subsection (2).
3. Property owners who claim a parcel was included in agricultural resource land in error because soils on the parcel are classified by the National Resources Conservation Service as “prime farmland if drained” and the soils are not drained; or “prime farmland if drained and either protected from flooding or not frequently flooded during the growing season” and the soils are not drained and are not protected from flooding or are subject to flooding during the growing season; or “prime farmland if irrigated” and the parcel is not irrigated due to lack of necessary water rights shall provide a written declaration documenting the drainage or irrigation status of the soils on the parcel. The reclassification will be considered a

comprehensive plan amendment set by LCC 17.165.020 and the fee shall be waived for property submitting a request under this subsection (3).

4. Property owners who claim a parcel was included in agricultural resource land in error due to an incorrect assessment of the presence of a commercial, non-soil-dependent agricultural use shall provide a written declaration documenting the absence of such use thereby rendering the parcel no longer devoted to or capable of long-term commercial agriculture. The reclassification will be considered a comprehensive plan amendment set by LCC 17.165.020 and the fee shall be waived for property submitting a request under this subsection (4). [Ord. 1207 §2 (Exh. D), 2009; Ord. 1197 §2, 2007]

RELEVANT CONDITIONS RELATED TO THE PROPERTY

Staff note the following conditions that are relevant to the criteria for this application:

- The block of Agricultural Resource Land and the Agricultural Comprehensive Plan designation in the area is 983.05 acres.
- The soils on the property are Prather Silty Clay Loam with 0 to 5 percent slopes. This soil is considered “Prime Farmland” according to the National Resource Conservation Service Soil Survey.
- The designation of the Agricultural Resource Land within the area is primarily meant to include “prime agricultural soils,” and was drawn primarily to capture larger parcels (i.e. over 20 acres). The size of the subject parcel is 37.22 acres. Within the zone in the area, seven of the 20 parcels in the zone are less than 20 acres.
- The parcel is bound on three sides by Rural Density Development (1 unit per 5 acres), and the distinction in the zones was originally drawn as a result of the differences in the adjacent lot sizes (as the neighboring parcels are also “prime farmland”). Neighboring parcels range in size from 1 to 20 acres.
- The parcel has 36.22 acres being taxed as Open Space Farm and Agriculture (OSFA) and 1.00 acre not enrolled in any tax programs. The parcel has been enrolled in OSFA since 1977.
- The lot is not served by any public water system.
- Three structures including a single-family residence are present on the property, and two non-fish bearing streams are located in the area.

ANALYSIS OF THE REZONE REQUEST

Given the presence of “prime farmland,” the predominant parcel size in the zone, and the existing tax status of the land, the parcel was likely reasonably classified given the Comprehensive Plan designation criteria. As a result, the application should likely not be processed under the standards in LCC 17.30.600(1).

Additionally, the applicant’s argument about the lack of long-term commercial viability for the agricultural operations (in itself) cannot be utilized to argue that the designation was in error. Profitability is not an available criterion for consideration under the Comprehensive Plan (see the Comprehensive Plan criteria above) and, according to a previous Lewis County decision by the Western Washington Growth Management Hearings Board (WWGMHB), economics are not sufficient to determine an erroneous designation of agricultural land. According to the WWGMHB:

(The proponent’s) argument that his property has never produced a profitable crop does not demonstrate that the County was clearly erroneous in designating it ARL. Although the Lewis County Court did note that the GMA was not intended to trap anyone in economic failure, when it comes to agricultural lands, it is the economic concerns of the agricultural industry not an individual farmer’s economic needs that are to be considered. (Hadaller v. Lewis County)

Given these facts, the one approach that can be utilized by the applicant is pursuing the rezone under 17.30.600(2) (an option that was provided to the applicant). This approach would require the demonstration that the designation of "Prime Farmland" was in error. While the applicant has provided soil information, retrieved from the National Resource Conservation Service website as part of this application (see Attachment B), this information unfortunately does not meet the requirement that the applicant "shall provide a written report by a certified soils scientist documenting the actual soils conditions on the parcel" (LCC 17.30.600(2)). As a result, the applicant has not provided adequate information to process the request under LCC 17.30.600(2).

CONCLUSION

Based on these factors, staff recommends that the Planning Commission hold a public hearing on the Comprehensive Plan amendment and rezone application, and ultimately deny the application by Annie Douglas and Keith Mohoric to rezone Parcel 017984001002 (unless additional details are provided that would warrant a reconsideration of the application). Major factors that should contribute to this decision include the fact that:

1. The property contains Prime Farmland soils as defined by the National Resource Conservation Service Soil Survey.
2. The property contains a parcel size larger than 20 acres, the predominant parcel size deemed suitable for agriculture as part of the Comprehensive Plan.
3. The bulk of the property is in Open Space Farm and Agriculture tax status, a criterion used in helping to determine the appropriateness of an Agricultural Resource Land designation.
4. The parcel is not served by a public water system or other urban facility.

LEWIS COUNTY COMMUNITY DEVELOPMENT DEPARTMENT

2025 NE Kresky Avenue
Chehalis, WA 98532-2626

(360) 740-1146
FAX: (360) 740-1245



APPLICATION FOR AMENDMENT

Rezone or Amendment to Zoning Regulations **Fee: \$2,500***

Comprehensive Plan Amendment

Resource land Opt-in Application

ARL relief errors LLC 17.30.600(3) only (no fee)

*more than 10 hours of staff review for rezone request will require an additional hourly fee @ \$100/hour. All other additional costs assessed at actual cost.

Applications Accepted September 1 through December 31

SUBMITTAL REQUIREMENTS:

- Completed application form
- Legal Description (for site specific amendments)
- Three site maps, no larger than 11" x 17", clearly labeled, and reproducible in black and white, showing the following features:
 - a. property boundaries showing existing land use designation and zoning.
 - b. property boundaries showing the proposed land use designation and zoning.
 - c. all natural and built features (such as roads, streams, buildings, slopes, fences, etc.) as well as adjacent properties and their uses.

Application Fee

For office use only
Permit Tech Alene

PLEASE TYPE OR PRINT

1. **Applicant (see page 5 if more than one applicant):**

Name Annie Douglas

Address 536 Brown Rd E, Chehalis WA 98532

Telephone Home(360) 748-7016 Work()

E-Mail _____

2. **Contact Person (if other than the applicant):**

Name Keith Mohoric

Address 514 Brown Rd E, Chehalis, WA 98532

Telephone Home(360) 259-2191 Work()

E-Mail keith.mohoric@att.net

3. **Assessors Tax Parcels:** 017984001002

4. Location of property:

Quarter Section SW 1/4 NW 1/4, Section 19, Township 13 North, Range 2 West

Location (road name/city): Brown Road E, Chehalis

Is the property within an Urban Growth Area? Yes _____ No X If yes, which jurisdiction? _____

5. Total acreage of the parcel(s): 37.22

6. Signatures:

I/We the undersigned, do hereby affirm and certify, under penalty of perjury, that I am/We are the owner(s) under contract of the described property, and that all statements contained in, or attached to, this application are in all respects true and accurate to the best of our knowledge.

Cherie Douglas Dec. 29 2015
Signature Date

Signature Date

PLEASE ANSWER THE FOLLOWING QUESTIONS, ATTACH AN ADDITIONAL SHEET IF NECESSARY

A. Identify the land uses surrounding the property affected, and describe how the proposed change would affect those surrounding land uses:

The land use designations of the surrounding properties is RDD-5 except for the parcel on the northern border of the property. The change in designation of this property to RDD-5 would have no adverse affect on any of the surrounding properties.

B. Explain why the existing land use/zoning designation is not appropriate:

The existing zoning is not in conformity with the land use/zoning designation of the neighboring properties. Neighboring properties on three sides of the property are all zoned RDD-5.

C. How have the conditions changed so that the proposed designation is more appropriate than the existing designation?

Land use designation for this property was designated as open-spaces agricultural during the Growth Management Act adoption due to the fact that the property had the agricultural/farm current use designation on it. This property's soil conditions, topography and lack of year round water prevent the use of this property as commercial agricultural land. Also the current designation does not afford the property owner the right to sub-divide the property even into two lots as the total acreage of the property is less than 40 acres and can not be divide into two 20 acre parcels.

- D. Explain why additional land of the proposed designation is needed in Lewis County, and why it is needed at the location proposed:
By designating this land as RDD-5 it provides additional growth opportunity
in an area of contiguous RDD-5 zoned properties. This area is near two
designated UGA areas and by reclassifying to RDD-5, property development
can be managed to occur near existing UGA's and not sprawled across more
traditional farm and forest lands.
- E. If the property is in the rural area (outside of an Urban Growth Area), demonstrate with appropriate data, how the rural density standards have been met:
As shown on the attached plat maps, you can see that the property is bordered
on three sides by RDD-5 designated property with the fourth side abutting
property zoned as open space/agricultural/forest land. By reclassifying to RDD-5
the property will meet the density standards for the majority of the property
surrounding it.
- F. Explain why the change is needed. What issue or problem is resolved by the proposed change?
Affords the land owner the fair and equitable value and marketability of the
property. By keeping the land in its current designation its reduces the value of
land taking away valuation without compensation to the landowner. By changing
the designation to RDD-5 it puts the property in the same classification as all
other properties adjacent to this property. This change will also afford future
increased taxable valuation as homes are developed on property.
- G. How would the proposed change serve the interests of not only the applicant, but the public as a whole?
This proposed change would give the the property owner the option to divide the
property into smaller parcels if so desired, to maximize the value of the property.
Its current designation assumes the property has value as a commercial farm
but soil conditions, lack of water and topography make this use unprofitable and
highly improbable. Also there is a seasonal stream through the middle of the
property that limits usage of a portion of the property as the stream does not have
a defined stream bed. By designating the property as RDD-5, development of
the property can be defined to maintain this stream area and prevent agricultural
encroachment. In addition this provides additional potential housing capacity
in an area currently designated RDD-5 except for this property.

H. Explain how the proposed rezone or amendment fulfills the goals of the Washington State Growth Management Act (RCW 36.70A.020):
Reduce sprawl - Keeps residential zoned properties (RDD-5) in a contiguous area of the county.

Property Rights - affords the landowner the proper designation and valuation based on other properties in area. Property was arbitrarily designated as open space based on the property being classified as agricultural/farm land for tax purposes, a designation that the property no longer meets.

Housing - Encourages the availability of affordable housing

I. Explain how the proposed rezone or amendment is consistent with the policies of the Lewis County Comprehensive Plan, including any policies of an applicable town or city (if the area is in the unincorporated area of an Urban Growth Area). Be sure to review all comprehensive plan chapters:

Policy R 1.2 Rural development should be encouraged to occur at a density of one dwelling per 5 acres - Property is within an area that is historically been developed in 5 acre parcels. It is abutted on three sides by properties of RDD-5 designation and on the North property line by housing developed on 20 acre parcels. By allowing RDD-5 designation this will keep like developed properties in a contiguous area.

Policy R 2.5 - The county will identify sufficient land for existing and projected housing needs. - By classifying as RDD-5 the potential for an additional 6 housing units is available to meet county growth in an area already designated RDD-5

J. TEXT AMENDMENTS ONLY: Most, but not necessarily all, text amendments are legislative changes; they can be processed only with the consent of the Lewis County Board of Commissioners. If a text amendment is proposed, identify the chapter and page number of the text to be changed, and provide the exact wording changes proposed.

Chapter: _____ Page: _____ Section: _____

ADDITIONAL APPLICANTS PAGE

Please have every party who wishes to join this application provide the following information and sign below. You may attach additional sheets if necessary.

Applicant:

Name FRIEDA M. ARCHIBENUE
Address 20907-116TH ST. E., BONNEYLAKE, WA
Telephone/E-Mail Home 253 291-6492 Work() - E Mail: - 98391
Tax Parcel(s): _____

Applicant:

Name LINDA S Dudel
Address 13743 Wallingford N, Seattle WA 98133
Telephone/E-Mail Home 206 367 4473 Work() _____ E Mail: layewith@comcast.net
Tax Parcel(s): _____

Applicant:

Name FRIEDA
Address _____
Telephone/E-Mail Home() _____ Work() _____ E Mail: _____
Tax Parcel(s): _____

Applicant:

Name _____
Address _____
Telephone/E-Mail Home() _____ Work() _____ E Mail: _____
Tax Parcel(s): _____

Applicant:

Name _____
Address _____
Telephone/E-Mail Home() _____ Work() _____ E Mail: _____
Tax Parcel(s): _____

Signatures:

I/We the undersigned, do hereby affirm and certify, under penalty of perjury, that I am/We are the owner(s) under contract of the described property, and that all statements contained in, or attached to, this application are in all respects true and accurate to the best of our knowledge.

Erica M. Archibueque 12-28-15
Signature Date

Linda F. Deuel 12/28/15
Signature Date

Signature Date

Signature Date

Signature Date

Signature Date

Legal Description of Property
Parcel # 017984001002

The Southwest quarter of the Northeast quarter (SW $\frac{1}{4}$ NE $\frac{1}{4}$) of Section 19, Township 13 North, Range 2 West, Willamette Meridian, Lewis County. Except that part beginning at the Southeast corner of said subdivision; thence West 230 feet; thence north 250 feet; thence East 230 feet; thence South 250 feet to the place of Beginning. SUBJECT to easements and rights of way for all existing public roadways, if any, upon, over or across any of the land covered.

Exhibit A. Property Boundaries Showing Existing Land Use Designation and Zoning

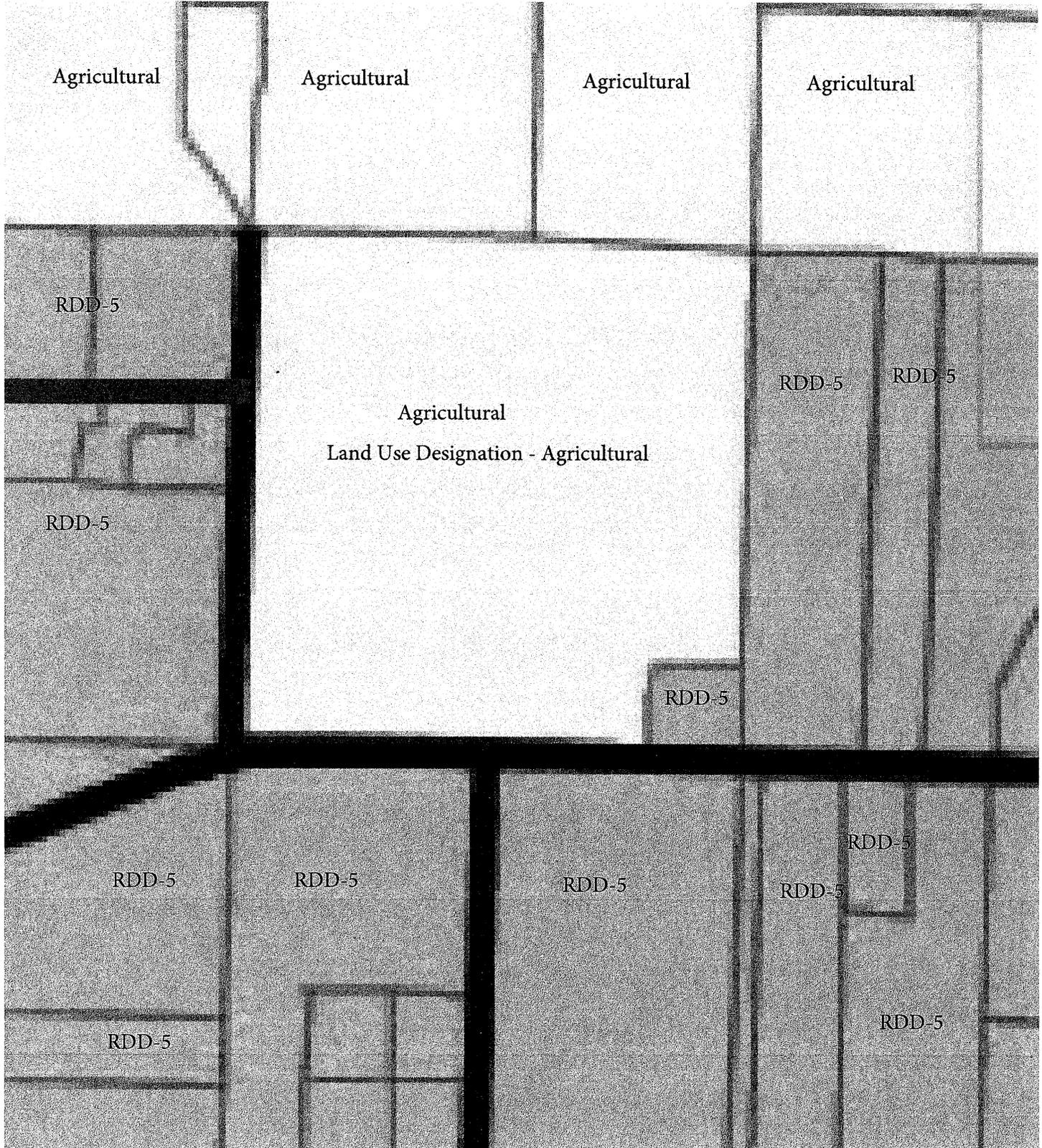


Exhibit B. Property Boundaries Showing Proposed Land Use Designation and Zoning

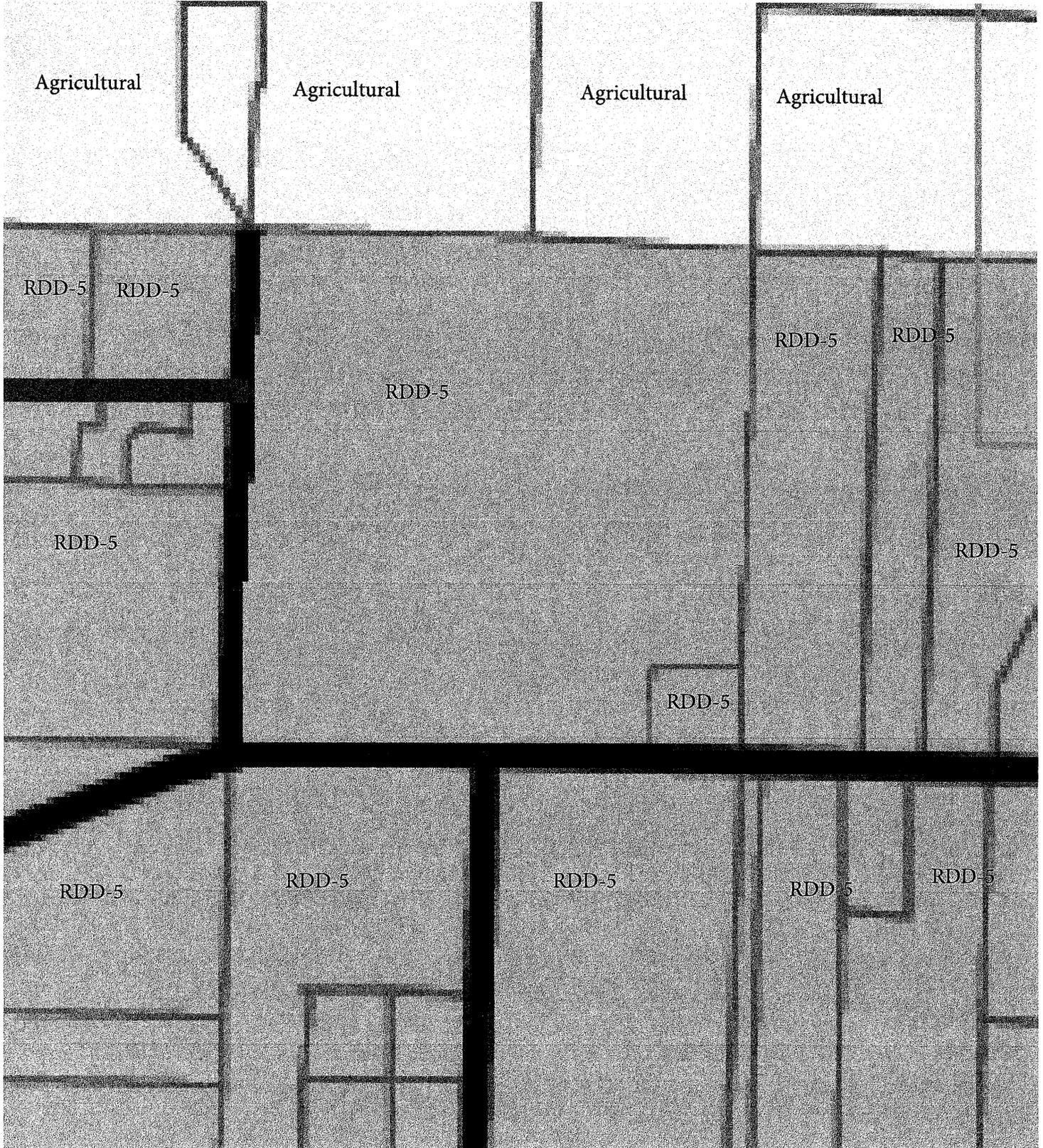
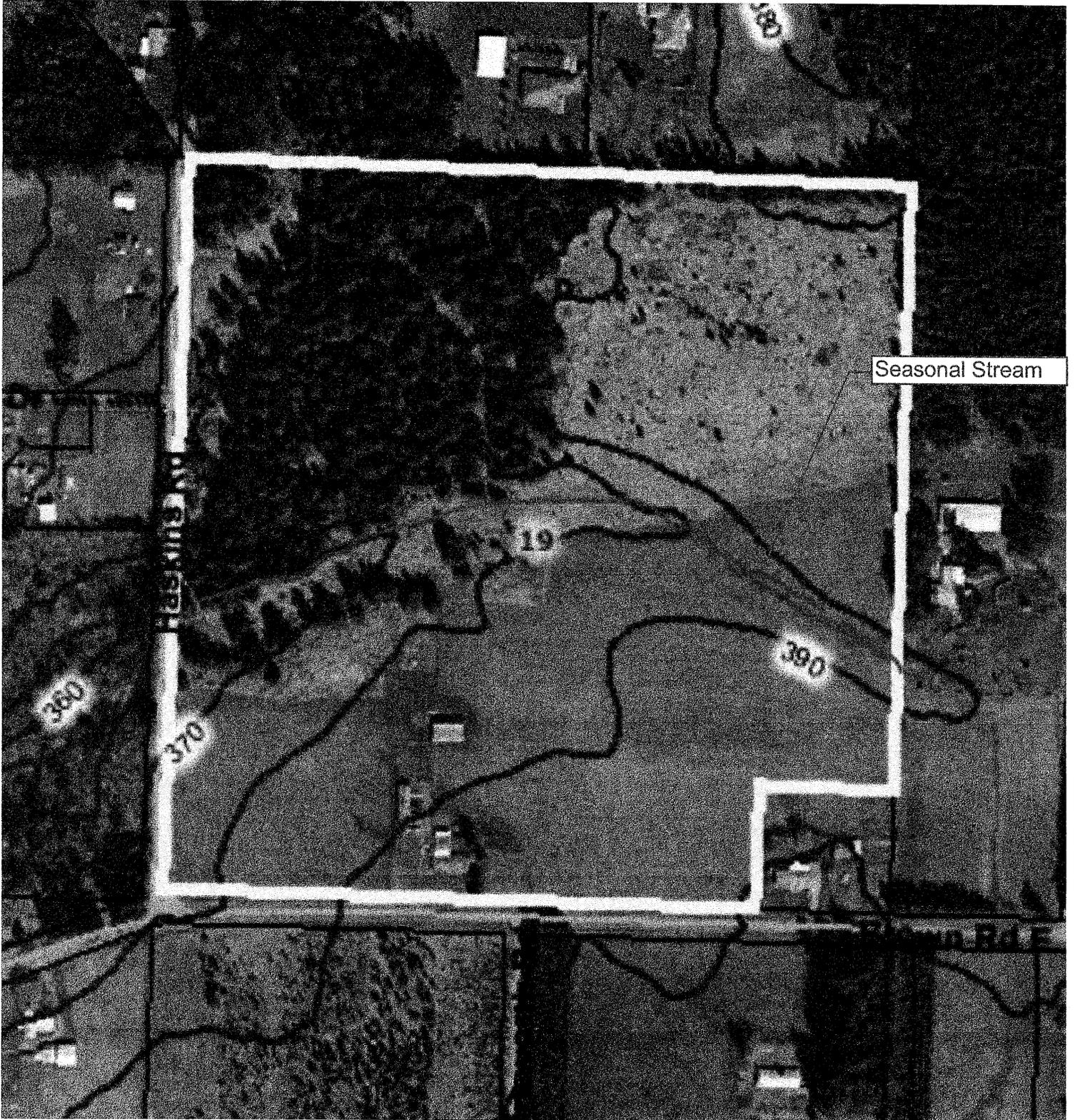


Exhibit C. All Natural and Built features



LAND CAPABILITY CLASSIFICATION

167 Prather silty clay loam, 0 to 5 percent slopes

3

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.

LAND CAPABILITY SUB-CLASSIFICATION

167 Prather silty clay loam, 0 to 5 percent slopes

w

Capability subclasses are soil groups within one capability class. They are designated by adding a small letter, "e," "w," "s," or "c," to the class numeral, for example, 2e. The letter "e" shows that the main hazard is the risk of erosion unless close-growing plant cover is maintained; "w" shows that water in or on the soil interferes with plant growth or cultivation (in some soils the wetness can be partly corrected by artificial drainage); "s" shows that the soil is limited mainly because it is shallow, droughty, or stony; and "c," used in only some parts of the United States, shows that the chief limitation is climate that is very cold or very dry.

In class 1 there are no subclasses because the soils of this class have few limitations. Class 5 contains only the subclasses indicated by "w," "s," or "c" because the soils in class 5 are subject to little or no erosion. They have other limitations that restrict their use to pasture, rangeland, forestland, or wildlife habitat.

FARMLAND CLASSIFICATION

167 Prather silty clay loam, 0 to 5 percent slopes All areas are prime farmland

NATIONAL COMMODITY CROP PRODUCTIVITY INDEX

167 Prather silty clay loam, 0 to 5 percent slopes

0.750

National Commodity Crop Productivity Index is a method of arraying the soils of the United States for non-irrigated commodity crop production based on their inherent soil properties. The rating a soil is assigned is the highest one of three basic crop group indices, which are based on the climate where the crop is typically grown. Cooler climates are represented by winter wheat, moderate climates are represented by corn and soybeans, and warmer climates are represented by cotton.

(http://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcs142p2_050734.pdf)

The interpretation is applicable to both heavily populated and sparsely populated areas. Ratings are for soils in their present condition. The present land use is not considered in the ratings.

Ratings are based on properties and qualities to the depth normally observed during soil mapping (approximately 6 feet). Soil, site, and climate properties that influence the growth of crops are major considerations. Soil productivity is influenced by many soil properties. An

ideal soil will store adequate amounts of water to nurture the crop between rains. This soil will have a near-neutral pH, will store nutrients, and lack toxic materials. The soil will have no barriers, either physical or chemical, to root growth. Water and gas transmission through the soil will be sufficient to maintain both water and oxygen at sufficient levels in the root zone. The soil will not be saturated with water during the growing season to the point that root growth is inhibited. The soil will not be subject to excessive flooding or ponding during the growing season. Slope is an important consideration because it affects erosion by water, runoff, and the operation of equipment. The climate must provide adequate water and heat to allow the desired crop to mature. A soil that differs from the ideal in any of these features will have lower inherent productivity for a particular crop. The further a soil differs from ideality in any one or all of the factors that determine inherent productivity, the lower its inherent productivity will be.

The ratings are both verbal and numerical. Rating class terms indicate the estimated productivity which is determined by all of the soil, site, and climatic features that affect crop productivity. "High inherent productivity" indicates that the soil, site, and climate have features that are very favorable for crop production. High yields and low risk of crop failure can be expected if a high level of management is employed. "Moderately high inherent productivity" indicates that the soil has features that are generally quite favorable crop production. Good yields and moderately low risk of crop failure can be expected. "Moderate inherent productivity" indicates that the soil has features that are generally favorable crop production. Good yields and moderate risk of crop failure can be expected. "Moderately low inherent productivity" indicates that the soil has features that are generally not favorable crop production. Low yields and moderately high risk of crop failure can be expected. "Low inherent productivity" indicates that the soil has one or more features that are unfavorable for crop production. Low yields and high risk of crop failure can be expected.

Numerical ratings indicate the overall productivity of the soil. The ratings are shown in decimal fractions ranging from 1.00 to 0.01. They indicate gradations between the point at which the combination of soil, site, and climate features has the greatest positive impact on inherent productivity (1.00) and the point at which the soil features are very unfavorable (0.01).

The map unit components listed for each map unit in the accompanying Summary by Map Unit table in Web Soil Survey or the Aggregation Report in Soil Data Viewer are determined by the aggregation method chosen. An aggregated rating class is shown for each map unit. The components listed for each map unit are only those that have the same rating class as listed for the map unit. The percent composition of each component in a particular map unit is presented to help the user better understand the percentage of each map unit that has the rating presented.

Other components with different ratings may be present in each map unit. The ratings for all components, regardless of the map unit aggregated rating, can be viewed by generating the equivalent report from the Soil Reports tab in Web Soil Survey. Onsite investigation may be needed to validate these interpretations and to confirm the identity of the soil on a given site.

ECOLOGICAL SITE ID**167 Prather silty clay loam, 0 to 5 percent slopes****G002XV202WA**

An "ecological site ID" is the symbol assigned to a particular ecological site. An "ecological site" is the product of all the environmental factors responsible for its development. It has characteristic soils that have developed over time; a characteristic hydrology, particularly infiltration and runoff, that has developed over time; and a characteristic plant community (kind and amount of vegetation). The vegetation, soils, and hydrology are all interrelated. Each is influenced by the others and influences the development of the others. For example, the hydrology of the site is influenced by development of the soil and plant community. The plant community on an ecological site is typified by an association of species that differs from that of other ecological sites in the kind and/or proportion of species or in total production. Descriptions of ecological sites are provided in the Field Office Technical Guide, which is available in local offices of the Natural Resources Conservation Service.

ECOLOGICAL SITE NAME**167 Prather silty clay loam, 0 to 5 percent slopes****Seasonally Wet Soils**

An ecological site name provides a general description of a particular ecological site. For example, "Loamy Upland" is the name of a rangeland ecological site. An "ecological site" is the product of all the environmental factors responsible for its development. It has characteristic soils that have developed over time; a characteristic hydrology, particularly infiltration and runoff, that has developed over time; and a characteristic plant community (kind and amount of vegetation). The vegetation, soils, and hydrology are all interrelated. Each is influenced by the others and influences the development of the others. For example, the hydrology of the site is influenced by development of the soil and plant community. The plant community on an ecological site is typified by an association of species that differs from that of other ecological sites in the kind and/or proportion of species or in total production. Descriptions of ecological sites are provided in the Field Office Technical Guide, which is available in local offices of the Natural Resources Conservation Service. Descriptions of those displayed in this map and summary table may also be accessed through the Ecological Site Assessment tab in Web Soil Survey.

Ecological sites and their respective unique set of characteristics are uniquely identified by the Ecological Site ID. The same Ecological Site Name may be assigned to multiple Ecological Site IDs. If you wish to display a map of unique ecological sites, it is recommended that you select the Ecological Site ID attribute from the choice list.

SOIL CHARACTERISTICS

The primary soil type is Prather silty clay loam, 0 to 5% slope. This soil type has a Soil Capability Class of 3 and a Sub-Class "w" per USDA Natural Resources Conservation Service (NRCS). Class 3 soils have severe limitations that reduce the choice of plants or that require special conservation practices, or both. And Sub-Class "w" shows that water in or on the soil interferes with plant growth or cultivation (in some soils the wetness can be partly corrected by artificial drainage).

Agricultural Land Designation

Based on the soil characteristics of Prather Silty Clay Loam and knowledge of the property the only types of agricultural uses for the property are pastureland, hay production or grain crops (i.e. wheat, oats, etc). Any type of crop that requires irrigation is not feasible as there is no source of water available to provide irrigation of the cropland on a commercially viable scale.

Per RCW 36.70A.170 land designated as Agricultural should have a long-term significance for the commercial production of food or other agricultural product. This land parcel does not meet this criteria as 1) available land area is not large enough to be commercially viable due to current structures, topography, and streams and 2) soil type does not allow the growing of a crop type that would be commercial viable.

It is assumed that to meet the criteria for the long-term significance for the commercial production of a crop means that the property is commercial viable, (i.e. that the activity is able to compete effectively and make a profit). In the absence of being able to make a profit, then the property is not commercially viable.

Forest Land Designations

As for Forest Land Designation, Washington State Department of Natural Resources designates this property as Non-Commercial or Marginally Commercial land. Therefore this parcel does not meet the definition of commercially viable. See attached map and map legend.

Additional Information for Question B

Per RCW 36.70A.170 for land to be designated as Natural resource lands (Agricultural or Forest Land) they should not be already characterized by urban growth. As can be seen from the land use map and existing residences and structures this area of the county is already characterized by urban growth and thus this property should not be singled out and designated Agricultural land when all other land to the east, west and south are designated RDD5.

RCW 36.70A.170

Natural resource lands and critical areas—Designations.

(1) On or before September 1, 1991, each county, and each city, shall designate where appropriate:

(a) Agricultural lands that are not already characterized by urban growth and that have long-term significance for the commercial production of food or other agricultural products;

(b) Forest lands that are not already characterized by urban growth and that have long-term significance for the commercial production of timber;

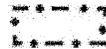
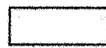
(c) Mineral resource lands that are not already characterized by urban growth and that have long-term significance for the extraction of minerals; and

(d) Critical areas.

(2) In making the designations required by this section, counties and cities shall consider the guidelines established pursuant to RCW 36.70A.050.

FPARS MAPS LEGEND

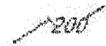
BOUNDARIES

-  County Boundary
-  Townships
-  Section Survey Lines

WATER BODIES

-  Open Water
-  Flats/Gravel Bars
-  Ice
-  Man Made Feature
-  Wet Area
- ???? Unknown/Unclassified

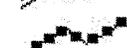
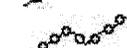
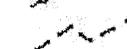
ELEVATION

-  Contours, 40' interval

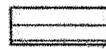
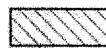
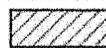
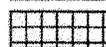
STREAMS

-  Stream Water Type S, F, N
-  U, unknown
-  X, non-typed per WAC 222-16
- * Water Type Change

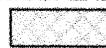
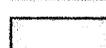
TRANSPORTATION

-  Paved Road
-  Unpaved Road / Surface Unknown
-  Abandoned Road (not on Activity map)
-  Orphaned Road (not on Activity map)
-  Trail
-  Railroad

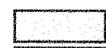
SITE CLASS – On Site Class Map only

-  Site Class I
-  Site Class II
-  Site Class III
-  Site Class IV
-  Site Class V

SITE INDEX – On Site Class Map only

-  Non-Commercial or Marginally Commercial
-  No Data
-  Red Alder

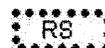
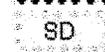
SLOPE – On Resource Map only

-  Medium Slope Instability
-  High Slope Instability

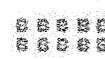
SOILS – On Resource Map only

-  Hydric Soils
-  Highly Unstable
-  Highly Erodible
-  Highly Unstable & Highly Erodible
-  No Data or Gravel Pits

RAIN ON SNOW – On Resource Map only

-  Rain on Snow
-  Snow Dominant

WETLANDS – Resource & Water Type Maps only

-  Type A  Forested
-  Type B  other

OTHER

-  WAU (Activity, Base & Water Type maps)
-  WRIA (Activity, Base & Water Type maps)
-  Fire Shutdown Zones (Activity & Base maps only)
- + Map Registration Tics (All map types)

Notes to Applicant or other user:

See the FPA/N instructions for Activity Map standards.

Site indices are based on the WA-DNR State Soil Survey. If the site index does not exist or indicates red alder, noncommercial, or marginally commercial species, the following apply:

- a) If red alder is indicated and the whole RMZ width is within that site index, then use site class V. If red alder is indicated for only a portion of the RMZ width, or there is on-site evidence that the site has historically supported conifer, then use the site class for conifer in the most physiographically similar adjacent soil polygon.
- b) In Western Washington, if there is no site index information, use the site class for conifer in the most physiographically similar adjacent soil polygon.
- c) In Eastern Washington, if there is no site index information, assume site class III, unless site specific information indicates otherwise.
- d) If the soil polygon indicates noncommercial or marginally commercial, then use site class V.

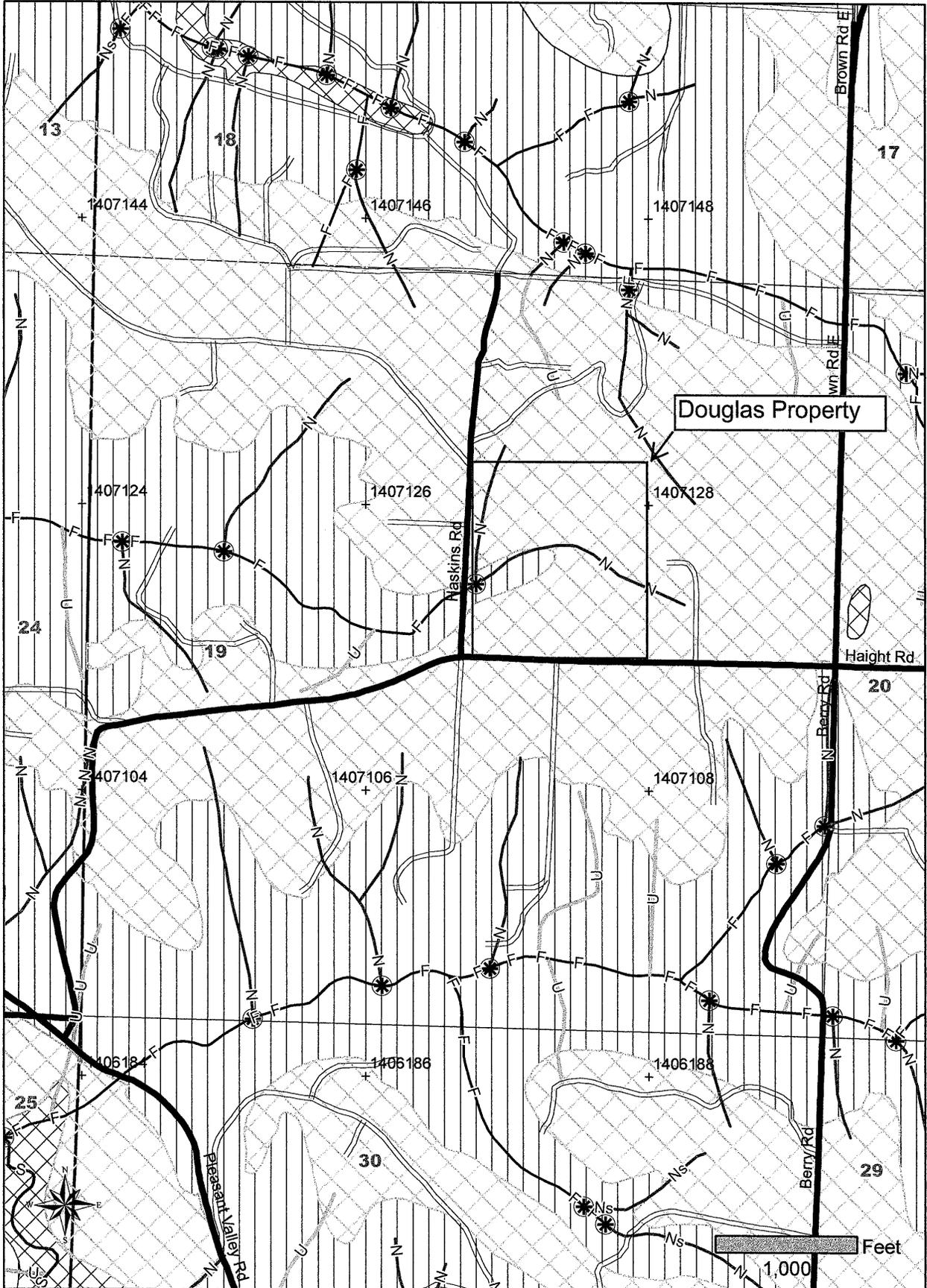
See Forest Practices Rules WAC 222-16-010 for a more complete definition of site class.

Disclaimer: Features shown on Forest Practices Application Review System (FPARS) maps represent data stored in the Washington State Department of Natural Resources (DNR) Geographic Information Systems database. As some of the data sets rely on outside sources of information, the DNR cannot accept responsibility for errors or omissions, and therefore there are no warranties that accompany this material.

FOREST PRACTICE SITE CLASS MAP

TOWNSHIP 13 NORTH HALF 0, RANGE 02 WEST (W.M.) HALF 0, SECTION 19

Application #: _____

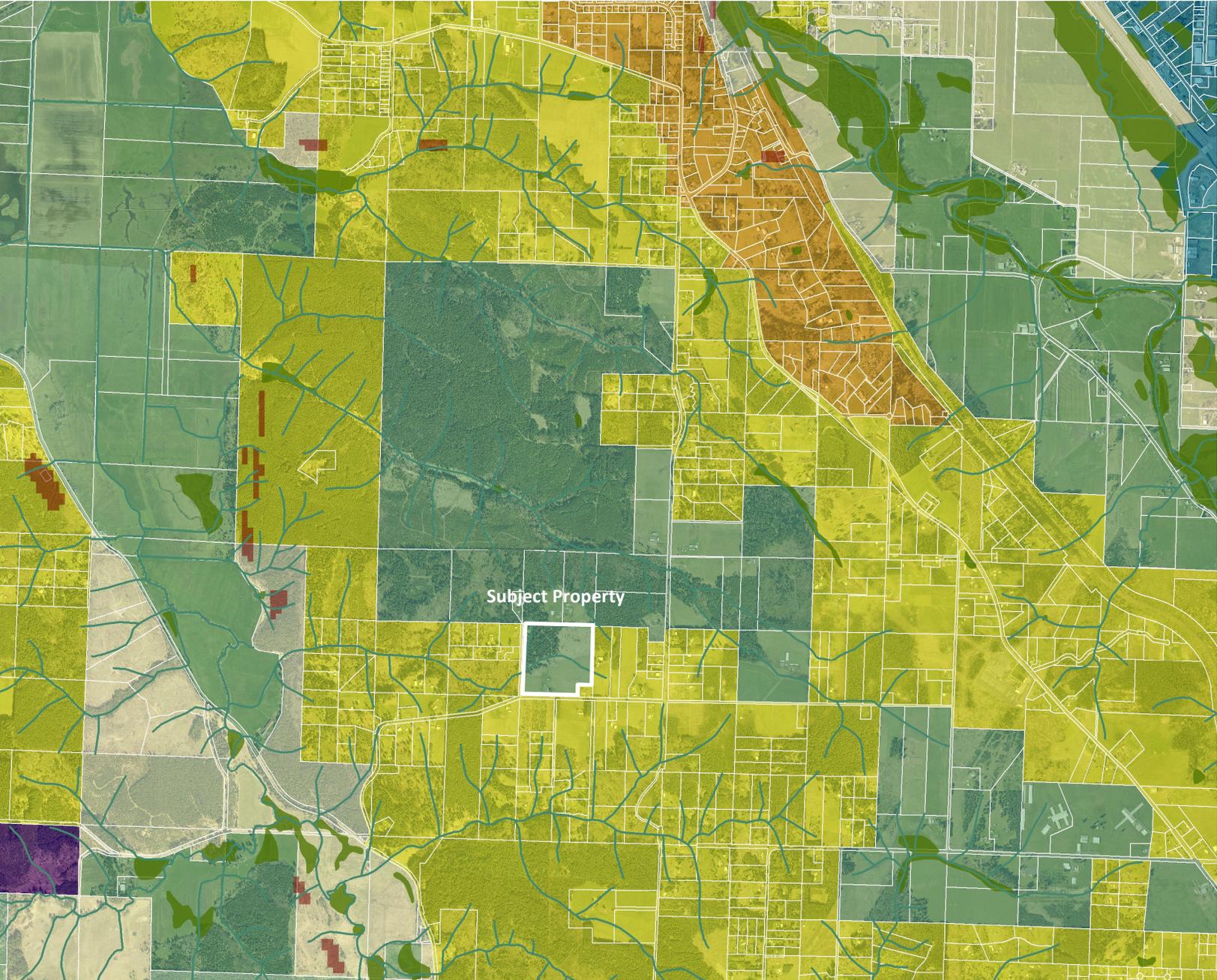


Site indices are based on the WA-DNR State Soil Survey. If the site index does not exist or indicates red alder, noncommercial, or marginally commercial species, the following apply:

a) If red alder is indicated and the whole RMZ width is within that site index, then use site class V. If red alder is indicated for only a portion of the RMZ width, or there is on-site evidence that the site has historically supported conifer, then use the site class for conifer in the most physiographically similar adjacent soil polygon. b) In Western Washington, if there is no site index information, use the site class for conifer in the most physiographically similar adjacent soil polygon. c) In Eastern Washington, if there is no site index information, assume site class III, unless site specific information indicates otherwise. d) If the soil polygon indicates noncommercial or marginally commercial, then use site class V.

See WA Forest Practice Rules (WAC 222), Chapter 222-16 for a more complete definition of site class.

DOUGLAS COMPREHENSIVE PLAN MAP CHANGE/ REZONE



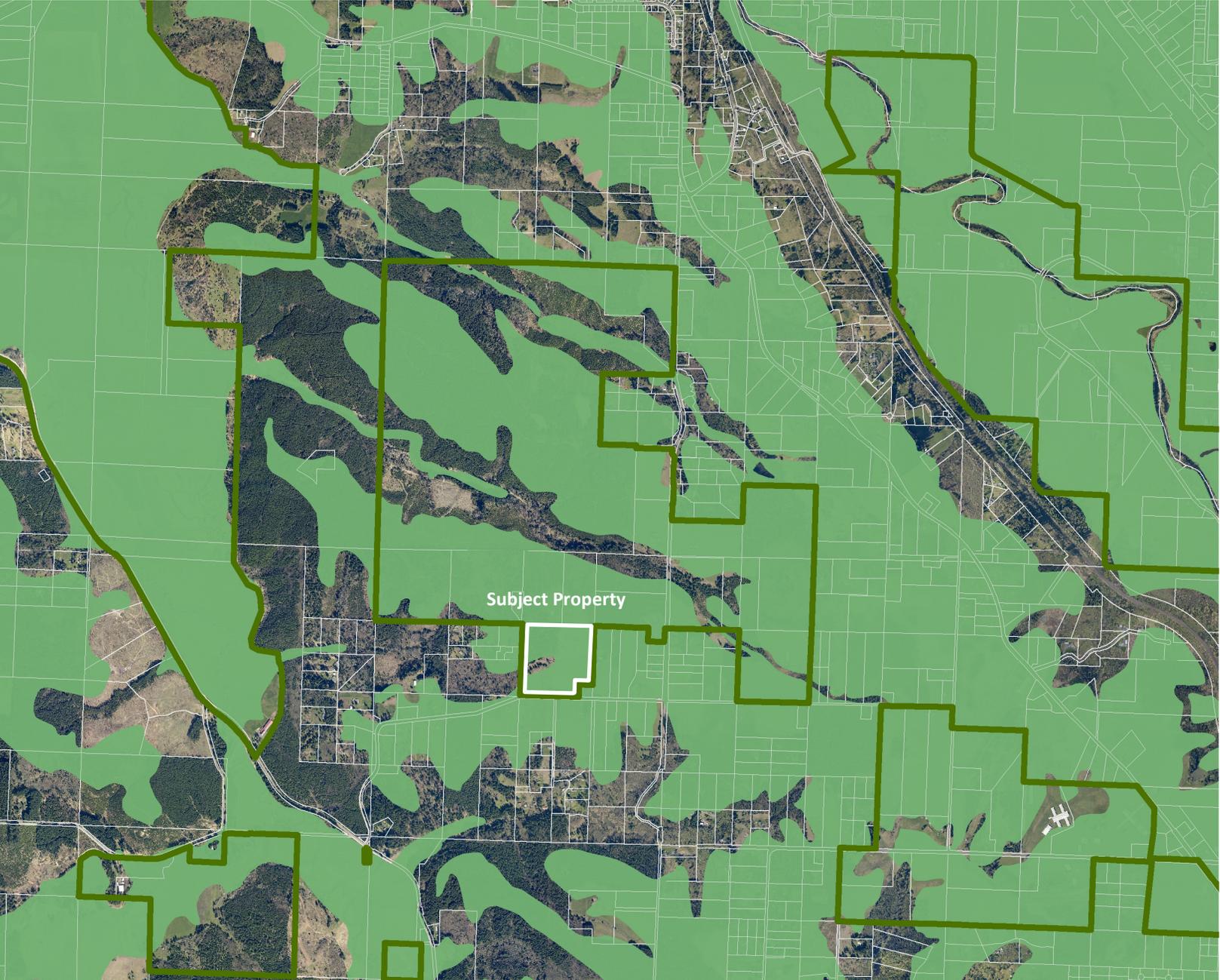
- Legend**
- Streams
 - Slopes Greater than 30%
 - Wetlands
- ZONE**
- ARL
 - CC
 - City
 - FC
 - FRL-LI
 - Forest
 - Lake
 - Mine
 - Park
 - RAI
 - RDD-10
 - RDD-20
 - RDD-5
 - RRC-R.5
 - RRC-R1
 - RRC-R10000
 - RRC-R2
 - STI
 - STMU
 - STR-4
 - TSA
 - UGA
 - UGA - County
 - Wilderness



This map is for planning purposes only. Lewis County makes no representation as to accuracy or fitness of the information for a particular purpose.



DOUGLAS COMPREHENSIVE PLAN MAP CHANGE/ REZONE



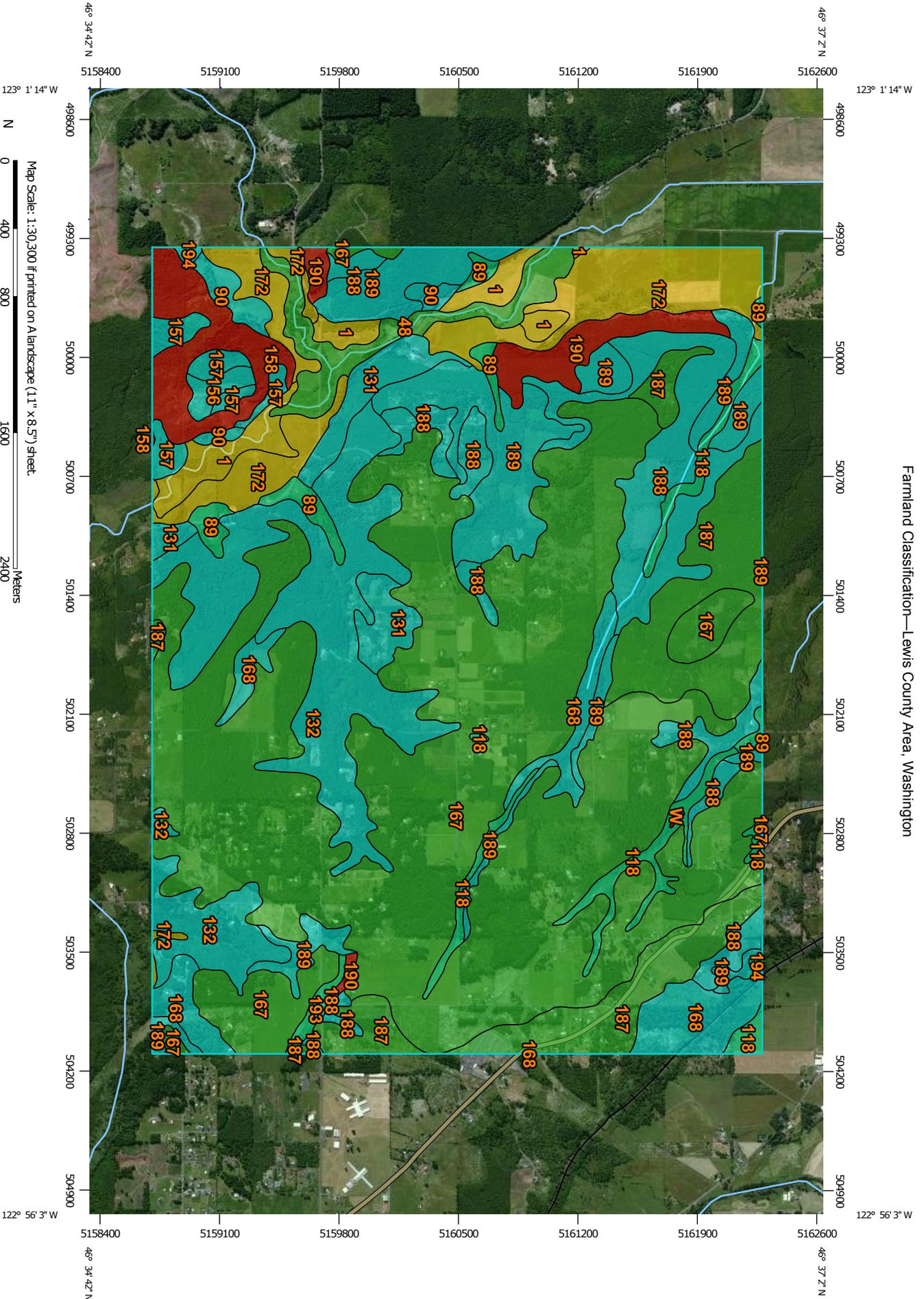
- Legend**
-  Agricultural Resource Land
 -  Prime Agricultural Soils

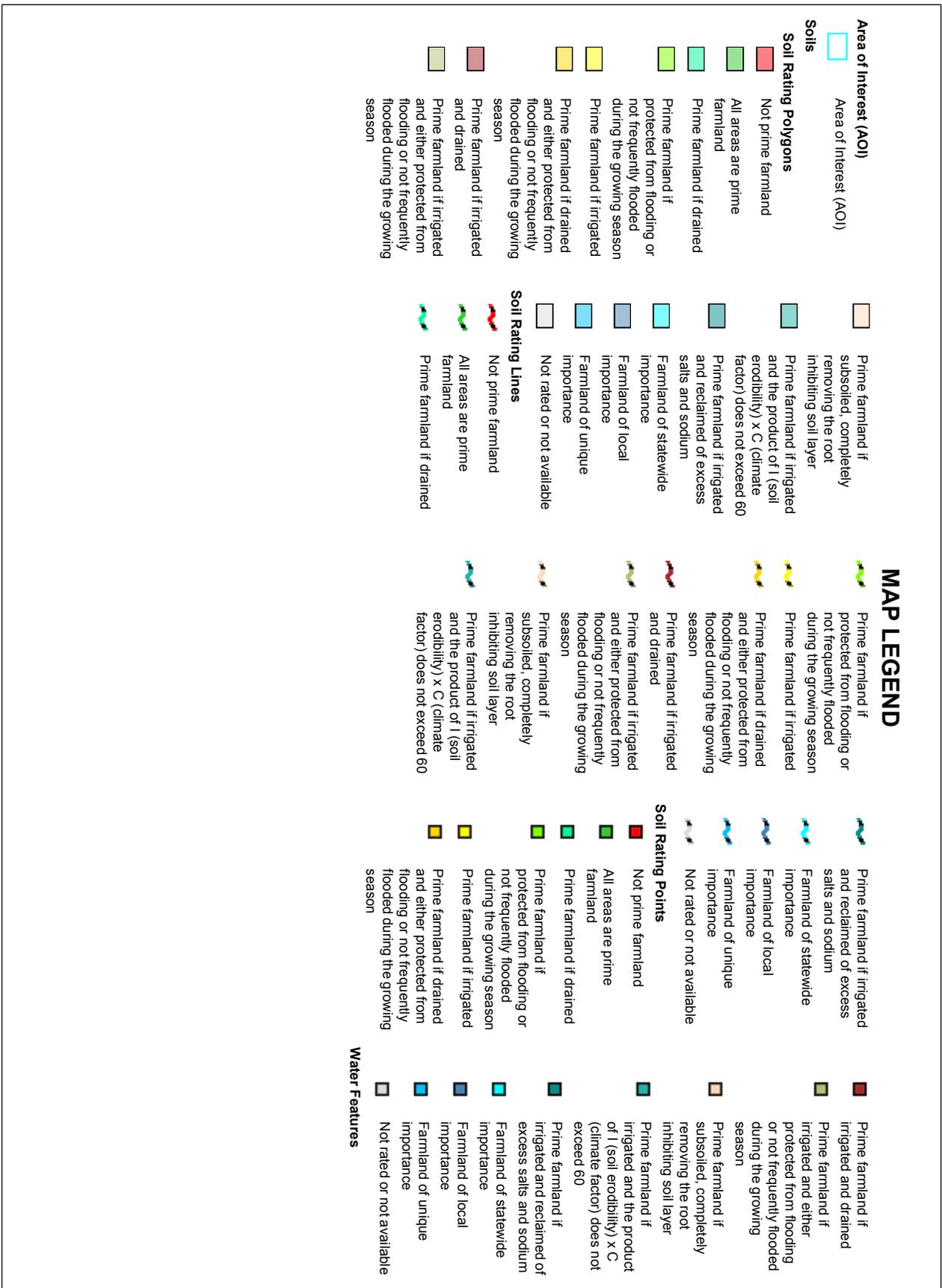


This map is for planning purposes only. Lewis County makes no representation as to accuracy or fitness of the information for a particular purpose.



Farmland Classification—Lewis County Area, Washington





MAP INFORMATION

-  Streams and Canals
- Transportation**
-  Rails
-  Interstate Highways
-  US Routes
-  Major Roads
-  Local Roads
- Background**
-  Aerial Photography

The soil surveys that comprise your AOI were mapped at 1:24,000. Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service
Web Soil Survey URL: <http://websoilsurvey.nrcs.usda.gov>
Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Lewis County Area, Washington
Survey Area Data: Version 13, Sep 15, 2015

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Jul 8, 2010—Oct 17, 2010

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Farmland Classification

Farmland Classification— Summary by Map Unit — Lewis County Area, Washington (WA641)				
Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
1	Alvor silty clay loam	Prime farmland if drained and either protected from flooding or not frequently flooded during the growing season	85.6	2.0%
48	Chehalis silty clay	All areas are prime farmland	90.0	2.1%
89	Galvin silt loam, 0 to 8 percent slopes	Prime farmland if drained	48.4	1.1%
90	Galvin silt loam, 8 to 15 percent slopes	Farmland of statewide importance	33.5	0.8%
118	Lacamas silt loam, 0 to 3 percent slopes	Prime farmland if drained	86.8	2.1%
131	Melbourne loam, 8 to 15 percent slopes	Farmland of statewide importance	91.8	2.2%
132	Melbourne loam, 15 to 30 percent slopes	Farmland of statewide importance	422.0	10.0%
156	Olympic silty clay loam, 8 to 15 percent slopes	Farmland of statewide importance	15.0	0.4%
157	Olympic silty clay loam, 15 to 30 percent slopes	Farmland of statewide importance	47.2	1.1%
158	Olympic silty clay loam, 30 to 65 percent slopes	Not prime farmland	99.4	2.4%
167	Prather silty clay loam, 0 to 5 percent slopes	All areas are prime farmland	1,771.8	42.1%
168	Prather silty clay loam, 5 to 15 percent slopes	Farmland of statewide importance	142.1	3.4%
172	Reed silty clay loam	Prime farmland if drained and either protected from flooding or not frequently flooded during the growing season	241.8	5.7%
187	Salkum silty clay loam, 0 to 5 percent slopes	All areas are prime farmland	336.5	8.0%
188	Salkum silty clay loam, 5 to 15 percent slopes	Farmland of statewide importance	291.2	6.9%
189	Salkum silty clay loam, 15 to 30 percent slopes	Farmland of statewide importance	313.5	7.4%

Farmland Classification— Summary by Map Unit — Lewis County Area, Washington (WA641)				
Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
190	Salkum silty clay loam, 30 to 65 percent slopes	Not prime farmland	75.2	1.8%
193	Scamman silty clay loam, 0 to 5 percent slopes	Prime farmland if drained	11.5	0.3%
194	Scamman silty clay loam, 5 to 15 percent slopes	Farmland of statewide importance	4.9	0.1%
W	Water	Not prime farmland	1.2	0.0%
Totals for Area of Interest			4,209.4	100.0%

Description

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.

Rating Options

Aggregation Method: No Aggregation Necessary

Tie-break Rule: Lower