

July 26, 2022

We moved up here in December of 2020 with our whole family from California where we lived our entire lives. Even though it was hard to leave, we looked forward to living on a farm. We specifically chose this property because of all the beautiful farmland and natural resources surrounding it. We were assured we didn't have to worry about urban development creeping in based on the integrity of Lewis County honoring the GMA to protect farmlands, shoreline, forests, & other resource land. Furthermore all surrounding areas on the Newaukeem River are 1 house per 20 acre parcel & that's the way it needs to stay. Incorporating this land into the UGA would violate GMA RCW 89.10.010 which is in place to protect valuable farmland. This area has been farmed for over 100 years and is still productive. In fact the ^{Virginia Breen} owner, who passed away after we moved here, was dedicated to keeping her property farmland & forest. She was highly opposed

to urban growth. It's a shame that anyone would go against what she wanted & worked so hard for.

Furthermore incorporating this area into the UGA violates ~~the~~ ^{GMA} RCW 36.70A.040 [3B] and ^{GMA} RCW 36.70A.060 [1] which are in place to identify and protect critical areas. In this area proposed for incorporation into the UGA there is a river, a lake, and 2 ponds. There are endangered fish in the river and this is an area that is supposed to be protected as a habitat for wildlife. There are also eagles' nests, and hawks' nests, both birds of prey protected under federal ^{state} law. According to the GMA, wetlands and shorelines are to be protected from UGA.

Another reason this area is not suitable

For development is it is a flood zone.

According to RCW H.06.01 floodways or critical areas should not be incorporated into the UGA. Any filling would redirect floodwaters which could be catastrophic. The runoff is a hazard to our health, safety, and property causing ~~irreparable~~ irreparable harm.

Finally, one reason we left the Bay Area was to get away from the noise pollution, light pollution, and traffic. We chose this property because we could raise our family on a farm, away from all of that pollution.

Even though we've only been here a year and a half, Lewis County feels like home. We are so thankful for our friends, neighbors, and the peacefulness of being out in the country. We don't want to move again and we ^{have} contacted a law firm in Seattle who use

have discussed this situation with. They are an environmentally friendly law firm and even though we don't want to go that route, if we have to we will ~~not~~ be forced to file a law suit to stop this approval process. If this area is incorporated into the UGA it will also negatively affect our property values and that of our neighbors. ~~we~~ ^{we} are working hard to preserve and thrive in an agricultural and rural community.

Sincerely,

Rob and Alison Simpson

Rob and Alison Simpson
517 Newaukum Valley Rd.
Chehalis, WA 98532

**Chapter 89.10 RCW
FARMLAND PRESERVATION**

Sections

89.10.005 Findings.
89.10.010 Office of farmland preservation.

* **RCW 89.10.005 Findings.** The legislature finds that maintaining the capacity to provide adequate food and fiber resources is essential to the long-term sustainability of the state's citizens and economy. The nation's population has reached three hundred million and will continue to increase for the foreseeable future. Further, the world population is now over six billion and is projected to reach nine billion by the year 2050.

X In Washington state, the population is growing by over one million people every decade with much of this growth occurring in western Washington. This growth is increasing the competition for land not only for housing, but also associated retail, commercial, industrial, and leisure industries.

X The legislature finds that many once-productive agricultural areas in western Washington have been overtaken and irreversibly converted to nonagricultural uses. Other agricultural areas in the state have diminished to the point that they are dangerously close to losing the land mass necessary to be economically viable. Further, only a limited number of areas in western Washington still retain a sufficient agricultural land base and the necessary agricultural infrastructure to continue to be economically viable both in the short term and the long term.

X The legislature recognizes that because this significant decline has largely occurred in less than a half century, it is imperative that mechanisms be established at the state level to focus attention, take the action needed to retain agricultural land, and ensure the opportunity for future generations to farm these lands.

X The legislature finds that history shows that previous advanced civilizations in the world were founded on highly productive agricultural lands and food production systems but when the land or its productivity was lost, the civilizations declined. In contrast, other civilizations have existed for millennia because they maintained their agricultural land base, its productivity, and economic conditions sufficient to maintain stewardship of their land.

X The legislature finds that there is a finite quantity of high quality agricultural land and that often this agricultural land is mistakenly viewed as an expendable resource. The legislature finds that the retention of agricultural land is desirable, not only to produce food, livestock, and other agricultural products, but also to maintain our state economy and preferable environmental conditions. For these reasons, and because it is essential that agricultural production be sufficient to meet the needs of our growing population, commitment to the retention of agricultural land should be reflected at the state policy level by the creation of an office of farmland preservation to support the retention of farmland and the viability of farming for future generations. [2007 c 352 § 1.]

RCW 89.10.010 Office of farmland preservation. (1) The office of farmland preservation is created and shall be located within the state conservation commission.

(2) Staff support for the office shall be provided by the state conservation commission.

(3) The office of farmland preservation may:

(a) Provide advice and assist the state conservation commission in implementing the provisions of RCW 89.08.530 and 89.08.540, including the merits of leasing or purchasing easements for fixed terms in addition to purchasing easements in perpetuity;

(b) Develop recommendations for the funding level and for the use of the agricultural conservation easements account established in RCW 89.08.540 with the guidance of the farmland preservation task force established under *RCW 89.10.020;

(c) With input from the task force created in *RCW 89.10.020, provide an analysis of the major factors that have led to past declines in the amount and use of agricultural lands in Washington and of the factors that will likely affect retention and economic viability of these lands into the future including, but not limited to, pressures to convert land to nonagricultural uses, loss of processing plants and markets, loss of profitability, productivity, and competitive advantage, urban sprawl, water availability and quality, restrictions on agricultural land use, and conversion to recreational or other uses;

(d) Develop model programs and tools, including innovative economic incentives for landowners, to retain agricultural land for agricultural production, with the guidance from the farmland preservation task force created under *RCW 89.10.020;

(e) Provide technical assistance to localities as they develop and implement programs, mechanisms, and tools to encourage the retention of agricultural lands;

(f) Develop a grant process and an eligibility certification process for localities to receive grants for local programs and tools to retain agricultural lands for agricultural production;

(g) Provide analysis and recommendations as to the continued development and implementation of the farm transition program including, but not limited to, recommending:

(i) Assistance in the preparation of business plans for the transition of business interests;

(ii) Assistance in the facilitation of transfers of existing properties and agricultural operations to interested buyers; and

(iii) Research assistance on agricultural, financial, marketing, and other related transition matters;

(h) Begin the development of a farm transition program to assist in the transition of farmland and related businesses from one generation to the next, aligning the farm transition program closely with the farmland preservation effort to assure complementary functions; and

(i) Serve as a clearinghouse for incentive programs that would consolidate and disseminate information relating to conservation programs that are accessible to landowners and assist owners of agricultural lands to secure financial assistance to implement conservation easements and other projects. [2007 c 352 § 2.]

***Reviser's note:** RCW 89.10.020 expired January 1, 2011.

County, King County, Kitsap County, Kittitas County, Lewis County, Mason County, Pacific County, Pend Oreille County, Pierce County, San Juan County, Skagit County, Snohomish County, Spokane County, Stevens County, Thurston County, Walla Walla County, Whatcom County, and Yakima County.

The GMA has resulted in many successes. Local governments now have comprehensive plans and standards to protect wetlands, streams, farms, and forests. Local governments have increased public involvement in planning. Local governments now plan for housing for all income groups. Local governments plan for how the public facilities needed to accommodate growth will be funded and built as they are needed. In the 1990s, Washington grew by over a million people for the first time. While this growth has resulted in challenges, the GMA helped cities and counties accommodate this growth.

Key Growth Management Act Provisions

The key requirements of the GMA are summarized below. They are listed in the steps required by the GMA. Following each requirement is a reference to the GMA section that contains that requirement. RCW means Revised Code of Washington, which is a compendium of state laws that contains the GMA along with the other state laws of general applicability. The Growth Management Act is available from the Washington State Office of the Code Reviser.

X **Step 1: Identify and Protect Critical Areas and Resource Lands**

- All cities and counties in Washington State must designate critical areas and adopt development regulations to protect them. Critical areas include the following areas and ecosystems: (a) wetlands; (b) areas with a critical recharging effect on aquifers used for potable water; (c) fish and wildlife habitat conservation areas (including rivers, streams, lakes, and salt water shorelines); (d) frequently flooded areas; and (e) geologically hazardous areas. RCW 36.70A.030(5), RCW 36.70A.040(3)(b), 36.70A.060(2), and RCW 36.70A.170. Best available science shall be used to designate and manage critical areas. RCW 36.70A.172.
- Counties and cities fully planning under the GMA must adopt development regulations to assure the conservation of designated agricultural lands, forestlands, and mineral resource lands. RCW 36.70A.040(3)(b) and RCW 36.70A.060(1).

Step 2: Designate County-wide Planning Policies and Urban Growth Areas (for counties and cities fully planning under the GMA)

- GMA Vision. "The regional physical form required by the [GMA] is a compact urban landscape, well designed and well furnished with amenities, encompassed by natural resource lands and a rural landscape." *Bremerton et al. v. Kitsap County*, CPSGMHB Case No.: 95-3-0039c Final Decision and Order 31 (October 6, 1995).
- The county legislative authority shall adopt county-wide planning policies to coordinate planning within the county and with adjacent cities and counties that share common issues. RCW 36.70A.040(3)(a) and RCW 36.70A.210. The policies shall include a review and evaluation program. RCW 36.70A.215.
- The county legislative authority shall designate urban growth areas sufficient to accommodate a planned population that is within the Office of Financial Management's 20-year population

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About the GMA

The Growth Management Act (GMA) provides for effective city and county planning for a better future. The GMA envisions that citizens and elected officials will work together, along with neighboring local governments and state agencies, to prepare a shared vision for the future, plan together for that future, and then work together to make that plan a reality.

New to the Growth Management Act? Check out our (<http://www.futurewise.org/action/resources/a-beginners-guide-to-the-growth-management-act>) (<http://www.futurewise.org/action/resources/a-beginners-guide-to-the-growth-management-act>)

(<http://www.futurewise.org/%7Bentry:1140:url%7D>)Beginner's Guide

(<http://www.futurewise.org/assets/resources/A-Beginners-Guide-to-the-GMA.pdf>) to get started.

Want to dive deeper into the GMA? Learn more below:

Twenty-nine counties and the cities in those counties currently plan under the Growth Management Act. The GMA counties are: Benton County, Chelan County, Clallam County, Clark County, Columbia County, Douglas County, Ferry County, Franklin County, Garfield County, Grant County, Island County, Jefferson

projection range for the county. RCW 36.70A.110(1). Final UGAs must be included in the county comprehensive plan. RCW 36.70A.110(6).

Step 3: Prepare and Adopt Comprehensive Plans (for counties and cities fully planning under the GMA)

- A comprehensive plan is a generalized coordinated land use policy statement adopted by a City or County Council or Commission under the GMA. RCW 36.70A.030(4) Comprehensive Plans must comply with the goals and requirements of the GMA, including requirements for the elements that must be included and the process used to prepare and adopt comprehensive plans.
- Counties and cities must provide early and continuous public involvement in planning under the GMA. RCW 36.70A.140.
- Counties and cities must adopt an internally consistent comprehensive plan that includes maps, text, standards and the following elements: land use, housing, capital facilities, utilities, rural (for counties only), and transportation. RCW 36.70A.070. Other elements, such as economic development and parks and recreation, can also be adopted as part of the comprehensive plan as can subarea plans or neighborhood plans. RCW 36.70A.080.
- The comprehensive plan must include a process for identifying and siting essential public facilities. RCW 36.70A.200. Essential public facilities are facilities that are typically difficult to site but are needed to serve our communities, such as airports, state education facilities, state and local correctional facilities, state or regional transportation facilities, solid waste handling facilities, and in-patient facilities.
- Cities and counties are required to identify lands useful for public purposes and open space corridors in their comprehensive plans. RCW 36.70A.150 and RCW 36.70A.160.
- Comprehensive plans must be coordinated with the comprehensive plans of neighboring cities and counties. RCW 36.70A.100.
- State agencies must be given a 60-day notice before the adoption of a comprehensive plan, development regulation, or amendment. RCW 36.70A.106(1).
- State agencies must comply Growth Management Act comprehensive plans and development regulations. RCW 36.70A.103.

Step 4: Adopt Development Regulations to Carry Out the Comprehensive Plan & Other Steps to Implement the Plan (for counties and cities fully planning under the GMA)

- Cities and counties must adopt development regulations that are consistent with and implement the comprehensive plan. RCW 36.70A.040(3) and (4).
- Development regulations are controls placed on development or land use activities by a county or city, including but not limited to, zoning ordinances, critical areas ordinances, shoreline master programs, official controls, planned unit development ordinances, subdivision ordinances, and binding site plan ordinances together with any amendments. There is a trend to unified development regulations that combine these types of requirements into an integrated whole. A development regulation does not include a decision to approve a project permit application, as defined in RCW 36.70B.020, even though the decision may be expressed in a resolution or ordinance of the legislative body of the county or city. RCW 36.70A.030(7).
- After adoption of the comprehensive plan, cities and counties must adopt and enforce a concurrency ordinance that prohibits development approval if the development would cause the level of service on a locally owned transportation facility or, for counties that consist entirely of

islands, a highway of statewide significance to decline below the standards adopted in the transportation element of the comprehensive plan, unless transportation improvements or strategies to accommodate the impacts of development are made concurrent with the development. RCW 36.70A.070(6)(a)(iii)(C) and RCW 36.70A.070(6)(b).

- After adopting a comprehensive plan, cities and counties must review their critical areas regulations to determine if they are consistent with the adopted comprehensive plan and development regulations. If they are not consistent, they must be updated to make them consistent. RCW 36.70A.060(3).
- City and county activities and capital budgeting decisions shall conform to the comprehensive plan. RCW 36.70A.120.
- Members of the public or organizations that participate in the review of comprehensive plans, development regulations, or amendments may appeal their adoption to one of three regional Growth Management Hearings Boards. RCW 36.70A.250 through RCW 36.70A.340.

Step 5: Evaluate and Update the Comprehensive Plan and Development Regulations (*for counties and cities fully planning under the GMA*)

- Counties fully planning under the GMA and the cities in those counties must review and evaluate their comprehensive plans and development regulations for effectiveness on an ongoing basis. RCW 36.70A.130.
- Counties fully planning under the GMA and the cities in those counties must review their comprehensive plans and development regulations every five years and, if needed, update them so the plans and development regulations comply with the GMA. RCW 36.70A.130. Counties and cities not fully planning under the GMA must review and update their critical areas designations, policies, and regulations and their natural resource land designations every seven years. RCW 36.70A.130(1).
- Clark, King, Kitsap, Pierce, Snohomish, and Thurston counties are required to prepare a buildable lands analysis every five years that determines whether these counties are achieving their planned densities, if sufficient buildable lands is available to meet the population projections and employment needs for the county, and whether measures need to be taken to accommodate the projected growth. RCW 36.70A.215.

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Tamara / Tammy Baker
575 Newaukum Hwy. Rd.
C. behalis, WA. 98532

For Virginia Breen's property
hearing on UGA

Note - Jan 21 - 2014

Mom wanted only

500.00 & I gave her

1,000.00 each yr -

Haying
barns - estate on all hay fields -
Denny Le due

care giver to mom - Rianne
was there & saw letter &

I had mom read agreement
over & I was in pitcher when
she signed - also Sue -

book keeper was there &

I showed her letter & saw
mom sign letter - told

her the 1,000.00 was for
farming & etc & from me -

Tammy Baker

Copy - Tammy Baker

July 25, 2022

To: Lewis County Planned Growth Committee

Subject: Chehalis Embarks on Process to Increase Urban Growth Area

My wife (Dalene) and I (Paul) own a working Certified Organic family farm that is very near to the acreage you are in discussion about for UGA expansion. The traffic, noise, garbage, and litter would all increase on Kirkland Road. Another issue of importance is the high amount of additional pollution that would be added to the Newaukum River. The Newaukum in recent years has become cleaner and is supporting more fish. A housing development would jeopardize the hard fought gains this river has made.

Housing developments won't hesitate to use inorganic herbicides (Roundup), fertilizers, and pesticides, all of which find their way into the waterways, which are detrimental to not only the fish, but all wildlife.

Another huge concern is the amount of added traffic that will clog an already extremely stressed interchange at I-5, exit 72. This interchange is currently at maximum capacity and cannot handle any more traffic. Both the Chehalis-Breen UGA expansion and the Chehalis-Westlund-Enbody expansion would make a large impact on the traffic problems that already exist at this exit.

For these reasons and more we are against both of the Chehalis UGA expansion plans.

Paul and Dalene Olson
282 Kirkland Rd.
Chehalis, WA 98532

July 26, 2022

Dear Lewis County Planning Commission, c/o Mindy Brooks

Please accept this written testimony regarding the **City of Chehalis proposal to expand the Chehalis-Breen UGA** to include a 109.8 acre parcel, bound on the north by Hamilton Road and east by Interstate 5.

My name is Mary Verner, a resident of unincorporated Lewis County. My street address is 423 Newaukum Valley Road, Parcel No. 018056002002, Sec 22 Twnshp 13N Range 02W PTW2 NW4LT2 3324395, 29.7 acres, Use Code- Agriculture. My small family farm is one parcel over to the west of the proposed UGA expansion. My neighbors to the north and east abut directly up to the southwest boundary line of the proposed UGA expansion area.

Please accept these comments in opposition to the Chehalis-Breen UGA expansion, incorporating my recommendations for the City to undertake further analysis, and my request to extend the public comment period.

The City of Chehalis proposes a significant conversion of land use

As I understand the proposal, the City supports the request of the estate of Virginia Breen to convert an old 110-acre family farm on the Newaukum River into a high-density multi-family residential development. The parcel has historically been agricultural, located within Lewis County Rural Development District RDD-20, 1 unit per 20 acres. If the city's UGA expansion is granted, the old Breen farm will be built out to 12 units per 1 acre, for a total of 456 new residential units on 38 acres of the farm, the remaining 72 acres being in the floodplain.

Under GMA regulations, counties should locate urban growth first in areas already characterized by urban growth. The area surrounding this parcel is not urban in character, and should not become urban through piecemeal expansion of city limits and high-density development.

To the west and southwest of this parcel, other parcels like mine are currently zoned 1 unit per 20 acres or Agricultural Resource Lands. The City correctly states that the specific parcel to be annexed is currently zoned for rural residential and no resource land conversion is analyzed. Despite this technicality, the likely practical effect of the proposed high-density development on this parcel will be creeping rezoning proposals moving further along the I-5 corridor to encompass the rest of the lower Newaukum River valley.

This is not a good location for build-out of high-density multi-family housing

The city's goal with this UGA expansion is well-intended – to accommodate projected population increases with additional affordable multi-family housing. However, cramming 456 affordable housing units onto 38 acres -- boxed in by I-5, Hamilton Road, existing commercial development, and a river that frequently floods – is not a good solution to the housing problem.

Although the City says that future zoning will not create an island of land use that is not similar to that surrounding it, the proposal would result in a high-density multi-family residential development on 38 acres of farm land adjacent to a heavily-traveled I-5 frontage road. Adjacent properties on Hamilton Road are built out with tractor, trailer and logging supply businesses where large vehicles and equipment connect between two I-5 access points at the LaBree Road and Rush Road interchanges. Future multi-family housing at this location might or might not be affordable, but it also may not be livable for residents packed close together beside incessant traffic, noise, lights, and activity, adjacent to a frequently-flooded area.

Traffic infrastructure in the area is failing and cannot accommodate the proposed new uses

The City's proposal provides only cursory analysis of transportation issues. Vehicle counts are deferred until development begins, but it is reasonable to expect that traffic will increase significantly when 456 new residential units are added to local surface roads. I ask the County to require more detailed transportation analysis before approving the proposed UGA expansion.

- What are the traffic control plans at the new development's intersections with Hamilton Rd S and Hamilton Rd N?
- There are no sidewalks or bicycle lanes or bus routes along either of the Hamilton Roads. Does the city plan to require developers to provide safe passage from the new high-density residential development to the commercial attractions at the Rush Road interchange?
- What are the proposed emergency ingress/egress points from the 456-unit residential development? The upper end of Hamilton Rd S is not a feasible option; it is narrow, cuts 90 degrees in a 15 mph turn, and is underwater whenever the river floods. This leaves only Hamilton Rd N, the busy I-5 frontage road, to provide one way access in and out of a densely-populated housing development.

There is already an urgent need to implement traffic flow and safety improvements at the dangerous I-5 Rush Road Exit. As new businesses have been added to the Exit 72 area, very little has been done to address the corresponding increases in traffic. Both sides of the freeway are in constant snarls of heavy trucks, passenger vehicles, and a few bold pedestrians. Passage through the failing intersections creates multiple risks of collisions from all directions. Meaningful investments in traffic controls are urgently needed just to try to rectify the unsafe conditions that already exist, even without increasing the volume of vehicles and pedestrians by allowing a new high-density residential development.

Going up Rush Road from the heavily congested Exit 72 area toward Napavine, the first turn to the north is onto Newaukum Valley Road, a rural residential county road where I live. Already, Napavine's growth along Rush Road and Sommerville Road is leading to increased spillover and bypass traffic, as drivers cut through Newaukum Valley Road to avoid traffic jams around the I-5 interchange. Traffic controls are already needed on Newaukum Valley Road, even without traffic increases that will inevitably result from nearby high-density residential development.

The City's proposal indicates Lewis County will be responsible for road repair until such time as the site is annexed. As a Lewis County taxpayer, I would like to see additional transportation

impacts analysis and capital infrastructure plans sooner, instead of allowing the UGA to expand and make the situation worse.

Flooding and critical areas

The city's proposed UGA expansion disregards the community's experiences with devastating flooding of the Newaukum and Chehalis Rivers. Flooding throughout the lower Newaukum valley is a serious concern and should not be treated as an insignificant factor when considering whether it's wise to build dense housing on a parcel that is transected by the Newaukum River.

As you know, the entire Chehalis Basin, including the stretch of the lower Newaukum River that passes through the proposed UGA expansion area, is the subject of significant public and private investment to reduce the impacts of flooding. As a landowner and taxpayer, I have a vested stake in those efforts and oppose developments that are inconsistent with those investments.

My next door neighbor's pasture directly abuts the proposed UGA expansion parcel. Every year, my neighbor's pasture is flooded. The foundations of my neighbors' homes are being washed out from below as the river changes course during each rainy season. Recently, the county had to install large pilings on the river bank to halt erosion that threatens to undermine Newaukum Valley Road when the river roars through the area at flood stage. The back of my 25-acre pasture almost abuts the proposed UGA expansion parcel. Every year, my pasture is flooded, with flood crests topping my fences and strong currents overwhelming my culverts. The land for miles around is frequently flooded - along Rice Road to Stan Hedwall Park, along Rogers Road and Shorey Road by the Veterans and RR museums, to the Newaukum River's confluence with the Chehalis.

The 110 acre parcel proposed for high-density residential development is not immune from the natural forces of water, especially since the Newaukum River runs right through it. The City acknowledges that 72 acres of the 110 acre parcel are within the flood zone. By designating 38 acres to be outside the 100 year flood plain, the City technically avoids expanding the UGA into known critical areas. But as a practical matter, the river will flood wherever it wants to go and it will not recognize an imaginary boundary around the 72 acres that fall within a formal floodplain designation. It seems unwise to site 456 new residential units within the meander zones of a river that is already causing devastating and recurring flood damage to properties that already exist.

In its proposal, the City gives little attention to critical area concerns by pointing to the UGA and WAC 365-196-310 provisions that allow UGA expansions into a floodplain when rights to the development of the land have been permanently extinguished, use of the land is limited, and development will not decrease flood storage, increase stormwater runoff, discharge pollutants to fresh waters, or increase hazards to people and property. The City says it will require a conservation easement and compliance with critical area development restrictions in the future. But the proposal lacks analysis of best available science to protect critical area functions and values. How will the river, streams, and groundwater be protected from stormwater runoff from the new high-density development? How will fish and wildlife corridors be kept intact? How will landowners be protected from hazards of unstable river banks? Additional analysis is

needed now, *before* the land use changes are approved, *before* problems are compounded and become too difficult and costly to fix.

This proposal will have a negative effect on neighboring property rights

I have serious concerns about the detrimental impacts of this proposal, and I expect some of my neighbors will also have concerns if they understand what will happen to our property values if this proposal is approved.

The direction of future growth should be toward compatible land uses. High-density residential growth on this parcel is not compatible with surrounding low-density commercial, rural residential and natural resource land uses. The area is already feeling the deteriorating effects of increasing noise and light pollution and a decreasing sense of safety. If the City is allowed to convert this historic farm parcel from rural to urban, the inevitable result will be gradual de-designation of other nearby forest and agricultural lands to make way for even more mixed-use high-density urban development.

If the Chehalis UGA is expanded and the old Breen farm is built out as intended, there will be permanent changes to the character of other properties along the lower Newaukum River valley. The UGA expansion proposal does not indicate how nearby natural resource lands will be preserved and protected.

At this time, my neighbors and I enjoy rural lifestyles in unincorporated Lewis County. But the UGA expansion map depicts a gradual squeeze being applied on us as Napavine builds out its city limits from the south and west, and Chehalis expands from the north and east. Urbanization of our rural lands is taking place without adequate planning and investment in traffic controls, and without sufficient consideration of environmental and quality of life impacts. Incremental urban conversion is not healthy for the surrounding community and will reduce the rural land base, adversely affecting families and businesses that rely upon agricultural and forest lands. Piecemeal expansions of urban growth areas should be avoided and site-specific proposals like the Chehalis-Breen proposal should be deferred until they are accompanied by full area-wide analyses of impacts.

I urge Lewis County to step in and protect the property rights of others in the vicinity. Please do not allow piecemeal UGA expansions to erode the long-term agricultural and commercial values of other properties to meet the City's need to accommodate future population growth. I am asking the County to protect family farms and to not allow conversion of valuable rural land to urban housing.

My property rights and contractual commitments are put at risk by this proposal

I bought my farm in 2017 with full intention to maintain the land as it has been farmed by four generations of Gleason family members before me. I have kept the land in agricultural production - harvesting hay, fruits, and vegetables; pasturing beef cows, goats, and layer hens, maintaining a clean water supply. I am investing in the property as a farm in an agricultural area, not as a speculative real estate purchase to be subdivided for dense urban development.

Based on the zoning and known conditions when I purchased my farm, I have made commitments that depend upon a rural agricultural land area, including:

- A long-term lease to a rancher to demonstrate rotational-grazing practices for pasture rehabilitation
- A long-term lease to a restoration ecologist to protect riparian and forest plantings along the two creeks that run across my property to the Newaukum River
- A long-term NRCS farm plan, and a partnership with the Lewis County Conservation District for riparian and forest restoration using native species as part of a carbon offset project
- A preservation easement in return for a Washington State Historic Preservation grant to stabilize my three-story barn that is listed on the Historic Barn Registry due to its agricultural significance and location in a rural agricultural setting.

The proposed UGA expansion will lead to land uses in the area that are not compatible with my investments in my agricultural property. Nearby urbanization will negatively affect my property values and put my existing long-term contractual commitments at risk.

Please extend comment period

On July 17, 2022, I received a Notice of Public Hearing by mail, and right away sent an email to the Lewis County Community Development Office requesting paper copies of all documents related to this proposed UGA expansion. I received in response an email with digital attachments and an offer to mail hard copies. In the interest of time, I took time vacation leave on Friday July 22 to personally visit the Community Development Office for assistance interpreting the map associated with the City's proposal.

The turnaround time for comments has been very short, and I have had a limited amount of time to research and better understand this proposal and its impacts on my property rights and our rural agricultural area. My comments are based on initial impressions and I have many questions. I respectfully ask you to consider extending the comment period so that I and other nearby property owners can better understand both the proposal and the review process that will result in this important decision.

At a minimum, please notify me at each step of the SEPA review process. Also, please notify me when the County Commission schedules a hearing on amendments to the comprehensive plan if the city proceeds with its Chehalis-Breen UGA expansion proposal.

Respectfully submitted,

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