# MASTER APPLICATION

<table>
<thead>
<tr>
<th>STAFF USE ONLY</th>
<th>DATE STAMP</th>
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<tbody>
<tr>
<td><strong>09 109641 VC</strong></td>
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<tr>
<td>Permit Type: Comprehensive Plan Amendment</td>
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<tr>
<td>Sub Type: Quasi-judicial</td>
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<tr>
<td>Work Type: Rezone</td>
<td></td>
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<tr>
<td>Site: 0 UNKNOWN UNKNOWN WA</td>
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<tr>
<td>Assessor Property ID: 22611110200</td>
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<tr>
<td>Applicant: WEYERHAUSE real estate DEV CO</td>
<td></td>
</tr>
<tr>
<td>Owner: WEYERHAUSE real estate DEV CO</td>
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</tbody>
</table>

The Master Application is required for all projects and shall accompany a project-specific supplemental application(s). The Master Application may not be submitted alone. Check the appropriate box for each supplemental application being submitted with this Master Application.

## Type of Project (check all that apply):

### Building:

- [ ] Residential (form SA001)
- [ ] Non-Residential (form SA002)
- [ ] Non-Residential Hood & Duct (form SA003)
- [ ] Non-Residential Sign (form SA004)
- [ ] Manufactured Home Placement (form SA005)
- [ ] Minor Permit (form SA006)
  - (Mechanical/Plumbing/Fire/Re-roof/Re-siding/Demo)
- [ ] Adult Family Home Inspection (form SA007)
- [ ] Fire Code Permit (form SA008 – SA012)

### Roads:

- [ ] Encroachment Permit (form SA013)
- [ ] Construction Permit (form SA014)
- [ ] Variance (form SA015)

### Environmental Health:

- [ ] On-Site Sewage System (form SA016)
- [ ] On-Site Sewage System Abandonment (form SA017)
- [ ] On-Site Sewage Evaluation (form SA018)
- [ ] Water System Design (Group B or 2 Party) (form SA019)
- [ ] Well Site (form SA020)

### Planning:

- [ ] Administrative Variance (form SA021)
- [ ] Binding Site Plan (form SA022)
- [ ] Boundary Line Adjustment/Lot Consolidation (form SA023)
- [ ] Critical Area Review (form SA024)
- [ ] Design Review (form SA025)
- [ ] Division of Land (form SA026)
- [ ] Division of Land Final Map (form SA026a)
- [ ] Environmental Checklist (SEPA) (form SA027)
- [ ] Forest Practice Activities (form SA028)
- [ ] Innocent Purchaser (form SA029)
- [ ] Joint Aquatic Resources Permit Application (JARPA) (form SA030)
- [ ] Legal Lot Determination (form SA031)
- [ ] Other Administrative Actions (form SA032)
- [ ] Presubmission Conference (form SA033)
- [ ] Reasonable Use Exception (form SA034)
- [ ] Release of Moratorium (form SA035)
- [ ] Rezone, Comp Plan Amendment, Open Space (form SA036)
- [ ] Shoreline Administrative Variance (form SA037)
- [ ] Site Plan Review (form SA038)
- [ ] Special Use Permit (form SA039)
- [ ] Variance – Hearing Examiner (form SA040)

Revised 4-09

Form No. MA001
Property Tax Parcel Number(s): 22611110200
Lot # and Subdivision Name (if applicable):
Property Address: Lot 2 135th Lane SE  City: Yelm  State: WA  Zip Code: 
Directions to the Property: See attached
Nearest Cross Street: Brenda Drive/Lane
Property Access Issues (locked gate, code required, dogs or other animals): ☒ No ☐ Yes
Describe:
OWNER IS RESPONSIBLE FOR SECURING ANIMALS BEFORE SITE VISIT.

Property Owner(s):
Weyerhaeuser Real Estate Development Company
Mailing Address: P.O. Box 9777 PH2  City: Federal Way  State: WA  Zip Code: 98063
Phone #: (253) 924-2675  Ext.  Fax #: (253) 924-3007
Cell #: (253) 670-5541  E-mail: marlene.voss@weyerhaeuser.com

Signature: *  Date: 10/31/09
Required for Planning Applications Only

Applicant (if different than owner):
Mailing Address:  City:  State:  Zip Code: 
Phone #: Ext.  Fax #: 
Cell #:  E-mail: 

Signature: *  Date: 

Point of Contact: ☒ Owner ☐ Applicant ☐ Other (If “Other” complete this section)
Name: Marlene Voss
Mailing Address: P.O. Box 9777 PH2  City: Federal Way  State: WA  Zip Code: 98063
Phone #: (253) 924-2675  Ext.  Fax #: (253) 924-3007
Cell #: (253) 670-5541  E-mail: marlene.voss@weyerhaeuser.com

Signature: Marlene Voss  Date: 10/31/09
*(Application is hereby made for a permit or permits to authorize the activities described herein. I certify that I am familiar with the information contained in the application and that to the best of my knowledge and belief, such information is true, complete, and accurate. I further certify that I possess the authority to undertake the proposed activities. I hereby grant to the agencies to which this application is made or forwarded, the right to enter the above-described location to inspect the proposed, in-progress or completed work. I agree to start work only after all necessary permits/approvals have been received.)

NOTE: The point of contact will be the person receiving all County correspondence and invoices regarding this application.

Revised 4-09

Form No. MA001
Yelm Meadows
Vicinity Map

<table>
<thead>
<tr>
<th>Location</th>
<th>Driving Distance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nisqually River</td>
<td>5 minutes</td>
</tr>
<tr>
<td>Lake Lawrence</td>
<td>5 minutes</td>
</tr>
<tr>
<td>Yelm</td>
<td>10 minutes</td>
</tr>
<tr>
<td>Interstate 5</td>
<td>20 minutes</td>
</tr>
<tr>
<td>Lacey</td>
<td>20 minutes</td>
</tr>
<tr>
<td>Olympia</td>
<td>30 minutes</td>
</tr>
<tr>
<td>Tacoma</td>
<td>45 minutes</td>
</tr>
</tbody>
</table>

3/23/06
Driving Directions to Yelm Meadows

From Tacoma:
1. Take I-5 south & exit to the right on to Exit 127. Left at the traffic light & head east on SR 512.
2. Follow SR 512 to second exit (Pacific Ave/SR 7) & turn right at traffic light (south on Pacific Ave/SR 7).
3. Follow SR 7 south through Parkland & Spanaway for approximately 5 miles to the junction of SR 7 and SR 507.
4. Turn right on SR 507 and follow south for 13.1 miles through Roy/McKenna and cross the Nisqually River.
5. Turn left on Vail Loop Road SE and follow south for approximately 1 mile to 4 way stop with Bald Hills Road SE.
6. Turn left onto Bald Hills Road SE & follow south for 5 miles.
7. Turn left on Mountain Vista Drive SE and follow for 1/2 mile.
8. Turn right on 146th Street SE, follow for 1/4 mile and turn left on the first paved road to your left. Follow paved road 1/4 mile to Yelm Meadows entrance.

From Olympia
1. From I-5 take Exit #111 (SR 510/Marvin Road) and follow to SR 510.
2. Follow SR 510 southeast approximately 11 miles through Yelm to traffic light at Bald Hills Road SE.
3. Follow SR 510 (Yelm Avenue) through Yelm to traffic light at Bald Hills Road SE.
4. Turn right on Bald Hills Road SE and follow southeast for approximately 6 miles.
5. Turn left on Mountain Vista Drive SE and follow for 1/2 mile.
6. Turn right on 146th Street SE, follow for 1/4 mile and turn left on the first paved road to your left. Follow paved road 1/4 mile to Yelm Meadows entrance.

9/25/06
November 6, 2009

Thurston County
Permit Assistance Center
2000 Lakerridge Drive SW
Olympia, WA 98502-1045

Re: Long-Term Agriculture Designation
Tax Parcel Nos. 22611110200; 22611110600

Enclosed are two applications for Comprehensive Plan Amendments. The requests are based on the protocol developed by Thurston County. It is our understanding that the fees will be waived for these applications. Should you need additional information or have any question, please do not hesitate to contact me at 253-924-2675.

Sincerely,

Marlene Voss
Assistant Project Manager

/mv

enclosure
Supplemental Application

COMPREHENSIVE PLAN AMENDMENT

PERMIT ASSISTANCE CENTER

09 109641 VC
Permit Type: Comprehensive Plan Amendment
Sub Type: Quasi-judicial
Work Type: Rezone
Site: 0 UNKNOWN UNKNOWN WA
Assessor Property ID: 22611110200
Applicant: WEYERHAUS REAL ESTATE DEV CO
Owner: WEYERHAUS REAL ESTATE DEV CO

This application cannot be submitted alone. In addition to this form, a complete package includes:

<table>
<thead>
<tr>
<th>Applicant Use</th>
<th>SUBMITTAL CHECKLIST</th>
<th>Staff Use Only</th>
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<tbody>
<tr>
<td></td>
<td>Master application</td>
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<td></td>
<td>Applicable processing fees. Refer to current fee schedules. Depending on the adopted fee structure, additional fees may occur if base hours/fees at intake are exhausted.</td>
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<td>Supplemental requirement checklist (attached)</td>
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<td>SEPA Checklist</td>
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<td></td>
<td>Rezone Application with required materials (if applicable)</td>
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</tbody>
</table>

1. What type of amendment are you requesting: Map Policy
2. Are you the property owner or under contract to purchase the property? Yes No

Site Specific Amendments to Land Use Designations

Complete the following section for amendments to land use designations. Attach additional sheets as needed. The County reserves the right to request additional studies or information necessary to process the application. An amendment that affects an Urban Growth Boundary will require additional studies.

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

Current land uses around the property include agriculture and single family homes. Adjacent properties are zoned RR5. These properties prior to the comprehensive plan amendment were zoned RR5. The change back to RR5 would not affect surrounding areas, but make this property compatible with exiting land use.
B. Explain why the existing land use designation is not appropriate.
   
   The current land use is not appropriate for 3 reasons: 1) soils do not support agriculture (see attached report), 2) wetlands on the property and 3) existing zoning surrounding the property is RR5.

C. How have conditions changed so that the proposed designation is more appropriate than the existing designation.
   
   Conditions have not changed. The property was zoned RR5 and this request is to put the property back into RR5 which is more appropriate and compatible with the current use of the area. The soils on-site do not support the change recently made to put the properties into long term agriculture, see attached report for more detail.

D. Explain why additional land of the designation proposed is needed in Thurston County, and why it is needed at the location proposed.
   
   The property was zoned RR5 and was changed by Thurston County. This property by being rezoned will allow the property to be put back into its original zoning, which is more compatible with the current land use of the area. It is important that the county does not designate areas based on soils for agriculture that it cannot support.

E. If the property is in the rural area (outside of an urban growth area), demonstrate, with appropriate data, how the property meets the designation criteria and policies and Chapter 2 – Land Use of the Comprehensive Plan.
   
   The property was recently rezoned into long term agriculture. The Board of Commissioners requested a protocol be developed to allow land owners to request removal from LTA after further studies. The property was studied and after being studied it was determined that it met the guidelines under the protocol for removal from LTA.

Text Amendments

Most, but not necessarily all, text amendments are legislative changes; they can be processed only with the consent of the Thurston County Board of Commissioners. However, if a text amendment with limited applicability is proposed, identify the chapter and page number of the text to be changed, and provide the exact wording changes proposed (attach separate sheets, if needed).

Name of Plan: ________________________________

Chapter: ________________ Page: _______________ Section/Other ________________________________

All Amendments

Note: Responses to the following section are required. Attach additional sheets as needed.

1. Explain why the change is needed. What issue or problem is resolved by the proposed change?
   
   The change is needed because the property will not support agriculture based on soils, which is why it was originally added into the LTA designation. Further new on-site studies, based on soils, shows that this property will not support agriculture. By removing the property the land owner will have the right to develop the property if they want to, which is the zoning when the property when purchased.
2. How would the proposed change serve the interests of not only the applicant, but the public as a whole? The proposed change would put the property back into its original designation. This change is not about serving the public interests, but about putting the property back into a zoning that it was removed from based on soils, which after further studies shows that the property does not meet the requirements.

3. Explain how the proposed amendment fulfills the goals of the Washington State Growth Management Act (RCW 36.70A.020). A list of the goals is attached. These properties were put into LTA because of the growth management act, but after further review and studies based on the adopted protocol by Thurston County, it has been determined that the properties do not meet LTA. This process meets goal No. 10 because the properties will be able to protect the wetlands and also No. 11, citizen participation and coordination.

4. Explain how the proposed amendment is consistent with the policies of the Thurston County Comprehensive Plan, including any policies of an applicable joint plan or Subarea plan. (Be sure to review the Transportation Chapters.) The proposed amendment is consistent with the protocol set up by the County giving property owners the criteria needed in order to remove properties from long term agriculture.

Applicant Signature(s)

I (We), the undersigned, do hereby affirm and certify, under penalty of perjury, that the above statements are in all respects true and correct on my (our) information as to those matters.

Weyerhaeuser Real Estate Development Company

Signed

[Signature]

Date

Printed Name

Signed

Date

Printed Name

Signed

Date

Printed Name

Signed

Date
Planning Goals
Washington State Growth Management Act
RCW 36.70A.020

1. **Urban Growth.** Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.

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

3. **Transportation.** Encourage efficient multimodal transportation systems that are based on regional priorities and coordinated with county and city comprehensive plans.

4. **Housing.** Encourage the availability of affordable housing to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.

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

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

7. **Permits.** Applications for both state and local government permits should be processed in a timely and fair manner to ensure predictability.

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

9. **Open space and recreation.** Encourage the retention of open space and development of recreational opportunities, conserve fish and wildlife habitat, increase access to natural resource lands and water, and develop parks.

10. **Environment.** Protect the environment and enhance the state’s high quality of life, including air and water quality, and the availability of water.

11. **Citizen participation and coordination.** Encourage the involvement of citizens in the planning process and ensure coordination between communities and jurisdictions to reconcile conflicts.

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

13. **Historic preservation.** Identify and encourage the preservation of lands, sites, and structures that have historical or archaeological significance.
SUPPLEMENTAL REQUIREMENT CHECKLIST

This application shall contain and/or address the following in a clear, accurate and intelligible form. Submit this checklist with your application. Check the box for each item addressed. Provide an explanation for any unchecked item.

<table>
<thead>
<tr>
<th>Applicant Use</th>
<th>USE BLACK or BLUE INK ONLY</th>
<th>Staff Use Only</th>
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<tr>
<td>□</td>
<td>1. One 8.5” x 11” or 11” x 17” map, drawn to scale, using a standard interval of engineer scale, which shall include the following:</td>
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<tr>
<td></td>
<td>a. All information drawn to scale (standard engineer scale).</td>
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<tr>
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<td>b. A north arrow, map scale, date and directions to the site.</td>
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<td></td>
<td>c. Property line boundaries and dimensions for all property lines.</td>
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<td></td>
<td>d. The location of all existing structures, including, but not limited to, mobile homes, houses, sheds, garages, barns, fences, culverts, bridges, and storage tanks.</td>
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<td></td>
<td>e. All means, existing and proposed vehicular and pedestrian ingress and egress to and from the site, such as driveways, streets and fire access roads, including existing road names and existing county and state right-of-way.</td>
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<td>f. The location of all existing easements.</td>
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<td>g. The location of all existing public and on-site utility structures and lines, such as on-site septic tanks, drainfield and reserve areas, water lines, wells and springs.</td>
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<td>h. Vicinity map, at a scale of not less than three (3) inches to the mile, indicating the boundary lines and names of adjacent developments, streets and boundary lines of adjacent parcels, and the relationship of the proposed development to major roads and highways.</td>
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<td>i. Location of critical areas or buffers affecting the site, both on-site and on adjacent properties, including but not limited to shorelines, wetlands, streams, flood zones, high groundwater, steep slopes and special habitats.</td>
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<td>2. Special reports (may include wetland delineation, geotechnical report, mitigation plan, or other).</td>
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</table>
**THURSTON COUNTY DEVELOPMENT SERVICES**

**ENVIRONMENTAL CHECKLIST**

"USE BLACK INK ONLY"

1. **Applicant:** Weyerhaeuer Real Estate Dev. Co.  
   **Address:** P.O. Box 9777 PH 2  
   Federal Way, WA 98063  
   **Phone:** 253-924-2675  
   **Cell:** 253-670-5541  
   **E-Mail Address:** marlene.voss@weyerhaeuser.com

2. **Point of Contact:** Marlene Voss  
   **Address:** P.O. Box 9777 PH 2  
   Federal Way, WA 98063  
   **Phone:** 253-924-2675  
   **Cell:** 253-670-5541  
   **E-Mail Address:** marlene.voss@weyerhaeuser.com

3. **Owner:** Weyerhaeuser Real Estate Dev. Co.  
   **Address:** P.O. Box 9777 PH2  
   Federal Way, WA 98063  
   **Phone:** 253-924-2675  
   **Cell:** 253-670-5541  
   **E-Mail Address:** marlene.voss@weyerhaeuser.com

4. **Property Address or location:**  
   Lot 2 136th Lane SE - Yelm

5. **Quarter/Quarter Section/Township/Range:** S 1/2 NW 1/4 Section 11 Township 16N, Range 2E

6. **Tax Parcel #:** 22611110200

7. **Total Acres:** 40

8. **Permit Type:** NA

9. **Zoning:** RR5

10. **Shoreline Environment:** NA

11. **Water Body:** NA

12. **Brief Description of the Proposal and Project Name:**  
    Lot 2 Yelm Meadows - Comprehensive Plan Amendment to remove property from Long Term Agriculture Designation
Thurston County
Development Services
Environmental Checklist

13. Did you attend a presubmission conference for this project?  ☐ Yes  ☒ No

If yes, when?  NA

14. Estimated Project Completion Date:  NA

15. List of all Permits, Licenses or Government Approvals Required for the Proposal (federal, state and local—including rezones):

Comprehensive Plan Amendment

16. Do you have any plans for future additions, expansion or further activity related to or connected with this proposal? If yes, explain:

No

17. Do you know of any plans by others which may affect the property covered by your proposal? If yes, explain:

No

18. Proposed timing or schedule (including phasing, if applicable):

NA

19. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

Long-Term Agricultural Designation Verification Report based on Site Evaluation Protocol for LTA Lands—Pacific Rim Soils & Water Inc. dated October 9, 2009

- 2 -
To be Completed by Applicant

1. Earth
   a. General description of the site (check one):
      - [x] Flat
      - [ ] Rolling
      - [ ] Hilly
      - [ ] Steep Slopes
      - [ ] Mountainous
      - [ ] Other: ______________________________

   b. What is the steepest slope on the site (approximate percent slope)?
      NA

   c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any prime farmland.
      Everson #36; Kapowsin #50

   d. Are there surface indicators or history of unstable soils in the immediate vicinity? If so, describe.
      No

   e. Describe the purpose, type, and approximate quantities of any filling or grading proposed. Indicate source of fill.
      None

   f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.
      NA
g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

None

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

NA

2. Air

a. What types of emissions to the air would result from the proposal (i.e., dust, automobile, odors, industrial wood smoke) during construction and when the project is completed? If any, generally describe and give approximate quantities if known.

None

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

None

c. Proposed measures to reduce or control emissions or other impacts to air, if any:

NA

3. Water

a. Surface

(1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

Wetlands
Thurston County
Development Services
Environmental Elements

To be Completed by Applicant

(2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

No

(3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

NA

(4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.

NA

(5) Does the proposal lie within a 100-year flood plain? If so, note location on the site plan.

No

(6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

No

b. Ground

(1) Will ground water be withdrawn, or will water be discharged to ground water? Give general description, purpose, and approximately quantities if known.

No
Thurston County
Development Services
Environmental Elements

To be Completed by Applicant

(2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: domestic sewage; industrial, containing the following chemicals; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

None

c. Water Run-off (including stormwater)

(1) Describe the source of runoff (including stormwater) and method of collection and disposal, if any (include quantities, in known). Where will this water flow? Will this water flow into other waters? If so, describe.

NA

(2) Could waste materials enter ground or surface waters? If so, generally describe.

NA

(3) Proposed measures to reduce or control surface, ground, and runoff water impacts, if any:

NA

4. Plants

a. Check the types of vegetation found on the site:

- Deciduous tree: x alder x maple □ aspen x other Oak
- Evergreen tree: x fir x cedar □ pine □ other
- Shrubs
- Grass
- Pasture
- Crop or grain
- Wet soil plants: □ cattail x buttercup x bulrush □ skunk cabbage
- Water plants: □ water lily □ eelgrass □ milfoil □ other

Other types of vegetation
Thurston County
Development Services
Environmental Elements

To be Completed by Applicant

b. What kind and amount of vegetation will be removed or altered?

None

c. List threatened or endangered species known to be on or near the site.

Unknown

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

NA

5. Animals

a. Check any birds and animals which have been observed on or near the site or are known to be on or near the site:

- [x] Birds: [x] hawk, [ ] heron, [x] eagle, [x] songbirds,
  - [ ] other:

- [x] Mammals [x] deer, [ ] bear, [x] elk, [ ] beaver,
  - [ ] other:

- [ ] Fish: [ ] bass, [ ] salmon, [ ] trout, [ ] herring, [ ] shellfish,
  - [ ] other:

b. List any threatened or endangered species known to be on or near the site.

Unknown

c. Is the site part of a migration route? If so, explain.

Unknown

d. Proposed measures to preserve or enhance wildlife, if any:

NA
Thurston County
Development Services
Environmental Elements

To be Completed by Applicant

6. **Energy and Natural Resources**
   a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

   None

   b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

   NA

   c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any.

   NA

7. **Environmental Health**
   a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.

   None

   (1) Describe special emergency services that might be required.

   NA

   (2) Proposed measures to reduce or control environmental health hazards, if any:

   NA
To be Completed by Applicant

b. **Noise**

(1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

None

(2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

None

(3) Proposed measures to reduce or control noise impacts, if any:

NA

8. **Land and Shoreline Use**

a. What is the current use of the site and adjacent properties?

Residential

b. Has the site been used for agriculture? If so, describe.

No

c. Describe any structures on the site.

None

d. Will any structures be demolished? If so, what?

NA

e. What is the current zoning classification of the site?

Rural Residential 5 (RR5)
To be Completed by Applicant

f. What is the current comprehensive plan designation of the site?
   Long Term Agriculture

g. If applicable, what is the current Shoreline Master Program designation of the site?
   NA

h. Has any part of the site been classified an "environmentally sensitive" area? If so, specify.
   No

i. Approximately how many people would reside or work in the completed project?
   NA

j. Approximately how many people would the completed project displace?
   NA

k. Proposed measures to avoid or reduce displacement impacts, if any?
   NA

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:
   NA

9. Housing

a. Approximately how many units would be provided, if any? Indicate whether high-, middle-, or low-income housing.
   None
Thurston County
Development Services
Environmental Elements

To be Completed by Applicant

b. Approximately how many units, if any, would be eliminated? Indicate whether high-, middle, or low-income housing.

None

c. Proposed measures to reduce or control housing impacts, if any:

NA

10. Aesthetics

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

NA

b. What views in the immediate vicinity would be altered or obstructed?

NA

c. Proposed measures to reduce or control aesthetic impacts, if any:

NA

11. Light and Glare

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

NA

b. Could light or glare from the finished project be a safety hazard or interfere with views?

NA
Thurston County
Development Services
Environmental Elements

To be Completed by Applicant

To be Completed by Applicant

c. What existing off-site sources of light or glare may affect your proposal?

NA

d. Proposed measures to reduce or control light and glare impacts, if any:

NA

12. Recreation

a. What designated and informal recreational opportunities are in the immediate vicinity?

Hiking, bird watching, horseback riding

b. Would the proposed project displace any existing recreational uses? If so, describe.

No

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

NA

13. Historic and Cultural Preservation

a. Are there any places or objects listed on, or proposed for, national, state, or local preservation registers known to be on or next to the site? If so, generally describe.

No

b. Generally describe any landmarks or evidence of historic, archaeological, scientific, or cultural importance known to be on or next to the site.

NA
c. Proposed measures to reduce or control impacts, if any

NA

14. Transportation

a. Identify public streets and highways serving the site, and describe proposed access to the existing street system. Show on site plans, if any.

Brenda Drive (public) access to Thimbleberry Lane to 136th Lane SE (private)

b. Is site currently served by public transit? If not, what is the approximate distance to the nearest transit stop?

No, unknown

c. How many parking spaces would the completed project have? How many would the project eliminate?

NA

d. Will the proposal require any new roads or streets, or improvements to existing roads or streets, not including driveways? If so, generally describe (indicate whether public or private).

NA

e. Will the project use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

No

f. How many vehicular trips per day would be generated by the completed project? If known, indicate when peak volumes would occur.

NA
To be Completed by Applicant

g. Proposed measures to reduce or control transportation impacts, if any:
   NA

15. Public Services

a. Would the project result in an increased need for public services (for example: fire protection, police protection, health care, schools, other)? If so, generally describe.
   No

b. Proposed measures to reduce or control direct impacts on public services, if any.
   NA

16. Utilities

a. Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other.

b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.
   None

17. Signature

a. The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Date Submitted 11/6/09

Print Name Marlene Voss
Signature: Marlene Voss
Non-project proposals are those which are not tied to a specific site, such as adoption of plans, policies, or ordinances.

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment. When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

To be Completed by Applicant

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

   None

   Proposed measures to avoid or reduce such increases are:

   NA

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

   None

   Proposed measures to protect or conserve plants, animals, fish, or marine life are:

   NA

3. How would the proposal be likely to deplete energy or natural resources?

   None

   Proposed measures to protect or conserve energy and natural resources are:

   NA
4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, flood plains, or prime farmlands?

None

Proposed measures to protect such resources or to avoid or reduce impacts are:

NA

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

None

Proposed measures to avoid or reduce shoreline and land use impacts are

NA

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

None

Proposed measures to reduce or respond to such demand(s) are:

NA

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment

None
Weyerhaeuser Real Estate Development Company
Attn: Marlene Voss
P.O. Box 9777-PH2
Federal Way, WA 98063-9777

October 9, 2009

Report File Number: S08-0085.let_Lot 2
Report Subject: Long-Term Agriculture Designation Verification
Location: The study site is Lot 2 of the Yelm Meadows development. Yelm Meadows is located south of Yelm, approximately 1/2 mile north of the intersection with 146th Ave SE—1/2 mile north of Bald Hill Rd SE. It is in Section 11, Township 16N, Range 2E (Tax Parcel Number: 22611110200).

Ms. Voss,

The following letter report describes results from a recent site visit conducted on September 25, 2009 by Daniel Ufnar, Certified Professional Soil Scientist, at the study site described above. Site work on the approximate 40 acre Lot 2 of the Yelm Meadows development was intended to determine if Thurston County’s designation and inclusion of the property into the County’s new Long Term Agriculture (LTA) zoning district was correct based on onsite soil characteristics. Surface soil conditions were evaluated at 33 test point locations on the site to determine if soils fell within the range of characteristics required by the County to be considered for LTA consideration. Points were located in the field using a hand-held GPS (Garmin © 60CSx unit), and a map of point locations is provided at the end of this report for reference 1.

Background
In response to a Growth Management Hearings Board decision, it is our understanding that Thurston County developed an expansion of an earlier map (and regulatory classification) of what they define as “Agricultural Lands of Long Term Commercial Significance” (LTA – as defined in Thurston County Comprehensive Plan, Chapter 3). The expansion resulted in the study site parcel being classified as LTA, which also means that the parcel is rezoned to a lower density – converting from a density of 1 unit per 52 acres to 1 unit per 20-40 acres. The recent mapping expansion added some parcels that were considered to be potentially suitable for conversion to commercial agriculture at some point. A list of NRCS prime farmland soil map units from Thurston County used in the LTA designation process is provided in Appendix I.

1 Map is NOT survey quality, but is intended to provide approximate locations of test points for reference only.
2 The study site was previously zoned Rural Residential Resource 1 to 5, or RRR 1/5
Detailed information about how the new LTA maps were created is described in a March 19th, 2008 Thurston County staff report titled: *Response to Western Washington Growth Management Hearings Board (GMHB) Order to Designate Long-Term Agricultural Lands of Commercial Significance, Thurston County Planning Commission Public Hearing Draft*. In general, the maps were created by first using Thurston County NRCS\(^3\) soil map units in the GeoData coverage\(^4\) that were classified as “prime farmland” soils (PFL\(^5\)) by NRCS. Then additional criteria were used to further refine and define LTA parcels. It should be noted that being classified as PFL (an NRCS designation) is not the same as LTA (a Thurston County designation). However, all parcels that were considered for LTA inclusion were initially chosen due to having a dominance (>51% of the total area) of PFL soils mapped onsite. However, according to NRCS guidance, soil maps are not intended for site specific management decisions, and should *always* be field verified. Please refer to the Thurston County description for more information.

Thurston County has adopted a field based assessment protocol to determine if these areas newly designated as LTA actually meet the above mentioned criteria. In general, the original LTA field assessment protocol described that areas with the following characteristics were to be excluded from LTA mapping: 1) wetland areas; or 2) areas with slopes > 8%; or 3) areas with an impermeable layer (bedrock, dentic glacial till, restrictive clay lenses) within 20 inches of the surface; or 4) areas with a water table within 20 inches of the surface during the growing season.

Subsequent to adopting that protocol, County staff received further clarification from the GMHB regarding designation of LTA lands. The most recent decision (April 22\(^{nd}\), 2009, Case No. 05-2-0002) found that the County could not remove parcels from consideration simply due to dominance of wetlands, because the presence (or absence) of wetlands was not listed on the County’s original criteria for LTA consideration. The County had argued that because wetlands are protected critical areas, then high value wetlands should not be considered for LTA consideration – i.e., that might be perceived as encouragement to convert wetlands to some type of agricultural use.

We should note that undrained wetland (hydric) soils are *not* considered prime farmland soils, and presence of PFL soils is *Criteria 1 of the County’s LTA designation criteria*. Therefore, parcels that are dominated by undrained wetland areas should not have been classified as LTA lands in the first place. Wetland or hydric soils that are listed as being *potential PFL soils* have a note saying that they must be *drained* in order to be classified as prime.

In addition to the wetland issue, areas mapped as undrained hydric soils will usually have shallow seasonal water tables which would also exempt them from PFL consideration. Soils with either a water table or with impermeable substrate or bedrock within 20 inches of the soil

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\(^3\) Natural Resources Conservation Service, formerly called Soil Conservation Service or SCS

\(^4\) GeoData is a hand-digitized version of the actual Thurston County Soil Survey. That soil survey is now available online at [http://websollsurvey.nrcs.usda.gov/](http://websollsurvey.nrcs.usda.gov/), and should be consulted in concert the GeoData for best information.

surface are not classified as PFL. These two issues lead directly to the conclusion that wetland areas should not be classified as LTA.

Due the recent GMHB decision, however, only onsite verification of shallow soil conditions (as described above) can be used to recommend removal of a parcel from the LTA program. That being said, in wetland areas, the water table will be at least 12 inches from the surface during the growing season, based on long accepted wetland definitions and identification techniques. As mentioned above, a water table or root restrictive layer within 20-inches of the soil surface does not meet the NRCS PFL definition.

This logic follows the Hearings Board decision regarding another site attribute not explicitly cited in the LTA designation criteria, slope percentage. The Board found that the County “…used slope, not as an unadopted criterion, but as a means of determining whether a soil is prime.” This standard, by extension, is also applied when arguing the exclusion of undrained wetland areas because the presence of a shallow water table during the growing season excludes soils from being classified as prime.

In order to prove that a study site parcel should be removed from LTA consideration, more than 50% of the parcel must fall outside the bounds of LTA criteria, although guidance from the GMHB indicates that some additional work must be carried out on parcels larger than 40-acres. The field-based protocol can be carried out by a properly trained soil scientist with a simple surface soil evaluation in some cases, but on more complex sites, may require detailed soil pit descriptions across the potential LTA area. Because the LTA classification system is map-unit based, the protocol only requires evaluation of those areas that are designated as LTA map units. In the absence of the characteristics listed above, a qualified soil scientist may apply NRCS rules to make a best professional judgment as to the PFL designation (and therefore, by extension the LTA designation), but the conclusions should be based on NRCS and National Cooperative Soil Survey guidelines outlined in the National Soil Survey Handbook (NSSH).

Results and Discussion
The 40 acre study site is located south of the sharp ‘V’ shaped bend in 136th Lane SE of the Yelm Meadows development. Onsite roads are new and do not yet show up as named roads on the Thurston County GeoData (TCGD) system. A trail, labeled as a “homesite path” in the field, extends south through the property and offsite to the south. This trail splits the site into two areas, with the eastern portion covering approximately 60-65% of the study site parcel acreage. The majority of our surface soil observations were made within the eastern part of the site, since that area contains wetter soils that were suspected to not meet the PFL definition (i.e., so would not be correctly mapped as LTA).

The study site was designated as LTA because the site is mapped as either the Everson Clay Loam (Map Unit 36), Kapowsin silt loam (SiL), 0-3% slopes (Map Unit 50), or the Norma SiL (Map Unit 76); all of which are on the Thurston County PFL list. We should note that both the Everson and the Norma are hydric soils; so the NRCS note on the list indicates clearly that these soil map units are only PFL if they are drained – which is not the case on this study site.
Each of the onsite map units have a specific range of characteristics—such as soil texture, structure, available water capacity, pH, etc.—(provided in the Thurston County Soil Survey) which make them potentially suitable to be classified as PFL (according to the NRCS standards). But to meet Thurston County LTA criteria, at a minimum, both the Everson and Norma map unit areas must also be effectively drained (i.e. a seasonal water table of greater than 20 inches from the soil surface during the growing season), and the Kapowsin map unit area must also have more than 20 inches of soil depth above either glacial till, or a long-duration seasonal water table. Some other NRCS based considerations—such as coarse-fragment content—should also be taken into account, in designating areas as PFL (for LTA consideration).

Because all three of the onsite map units are on the potential PFL list, the entire 40 acre site is currently considered to be potential LTA prime farmland by Thurston County (~21 acres of Map Unit 36 [Everson], ~14 acres of Map Unit 50 [Kapowsin] and ~5 acres of Map Unit 76 [Norma]). According to the current County protocols, if more than half of the site had soil characteristics that did not meet the PFL definition, then the entire parcel would be removed from the LTA zoning district. Essentially, our job is to evaluate whether the soil map units on site are mapped correctly, and/or to evaluate whether the hydric soil map units are drained (i.e., have a current water table at >20 inches depth, and/or if the non-hydric soil map units have more than 20 inches of soil depth to a water table or a restrictive layer (such as till or bedrock).

**Everson #36 Map Unit Area Evaluation**

The Everson CL is a hydric soil—meaning that under normal, typical conditions, these soils would have a long-duration seasonal water table within 12 inches of the soil surface, and as such, often support wetland conditions. To be classified as PFL (i.e., to allow for effective farming) this wetland soil must first be artificially drained. Therefore, if the Everson CL map unit area is field-confirmed to either support wetland conditions (having a long-duration water table of less than 12 inches from the surface during the growing season) and/or if the map unit area shows no evidence of artificial drainage—such as ditches, tile drains, etc.—the area does not meet PFL standards, so should be removed from the LTA map.

Based on wetland delineation work completed by Habitat Technologies (HT), and documented in their report (dated February 8th, 2007), there are wetlands associated with Map Unit 36 through much of the study site. The formally delineated wetland edge in the field corresponds fairly well to the Everson mapping unit, although is slightly smaller. We should note that all map units, by design, contain inclusions of other soil types. That is why field verification is vital. We estimate that about 12-13 acres (out of about 21 total acres) of the onsite Map Unit 36 area was delineated as wetland by HT. This conservative estimate is an approximation, based on HT’s wetland coverage map and measurements made using the TCGD and Web Soil Survey measurement tools.

During the PRSW onsite assessment on September 25, 2009, it was confirmed that these areas delineated by HT were wetlands—having a dominance of wetland vegetation, hydric soils (low

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6 NRCS Web Soil Survey is the official public source for the most up-to-date soil inventory information. [http://websoilsurvey.nrcs.usda.gov/app/](http://websoilsurvey.nrcs.usda.gov/app/)
chroma colors and common distinct redoximorphic features within 10 inches of the surface), and a water table within 12 inches of the surface based on accepted wetland hydrology indicators. Present indicators included water stained leaves left in surface depressions, water marks on the ground surface and vegetation, and algal mats within depressions, refer to photos in Figure 1. We also confirmed that there were no existing drainage structures or systems within the map unit that would effectively drain these soils.

![Figure 1. Wetland hydrology indicators found in Everson CL map unit in the south-central portion of the property. Arrow points to algal mat, water stained leaves, and water marks at the ground surface. The hydrology indicators, combined with the soil morphology is an indication of seasonal surface ponding during the growing season.](image)

Other areas onsite mapped as Everson CL – but were not wetland – were located within clear-cut areas in the south central portion of the property, and were estimated to be about 5 acres in size. We assessed this area using an extensive (500-foot) transect through the clear-cut area; soils were probed at the surface approximately every 50 feet. A total of 10 points were examined within the clear cut for signs of 1) a shallow groundwater table or 2) root restrictive layer within 20 inches of the soil surface, or 3) near-surface coarse fragments larger than 3 inches in diameter. The National Soil Survey handbook (NSSH) states that soils with > 10% coarse fragments (by volume) with diameters of ≥ 3 inches (equivalent to cobbles, stones, or boulders) in the top 6 inches of a soil should be excluded from PFL designation; these soils could not be effectively farmed due to the large rocks breaking equipment and reducing soil water holding capacity. A heavy-duty, steel handled sharpshooter shovel (shown in Figure 2) was used to probe the soil surface along the transect to detect a relative abundance of surface and near-surface cobbles, stones or boulders.

Eight of the points examined had cobbles, stones or boulders within 6 inches of the soil surface or laying on the ground surface itself (refer to Figure 2). The other two points were wetland (hydric) soils with evidence of a seasonal water table within 12 inches of the surface. These wetland areas roughly correspond to additional small wetland features that HT delineated. It should be noted that the majority of soils within the clear-cut had characteristics of the Kapowsin
soil series, which is mapped in the far eastern portion of the property and extending offsite to the south. The eastern most portion of the clear-cut is included within the Kapowsin GSL 0-3% slope map unit.

Based on the lack of drainage structures that would effectively lower the seasonal ground water table, evidence of near-surface and surface hydrology across much of the map unit (wetlands), and presence of large (> 3 inches in diameter) coarse fragments within 6 inches of the soil surface across the areas examined outside of wetland boundaries, we note that that the onsite portions of Everson CL (Map unit 36) do not meet requirements to be classified as PFL, and so should be removed from LTA classification.

Norma #76 & Kapowsin #50 Map Unit Area Evaluations
PRSW staff also carried out surface soil evaluations across portions of both the Norma and Kapowsin map units. As mentioned above, the site is bisected from north to south by an old logging road (which is labeled as a homesite path by onsite signs). Soils were evaluated along a 375 foot transect that trended from northwest to southeast, extending SE from where the path meets the 'V' of the main gravel road (136th Lane SE) to the wetland edge that roughly corresponds with the boundary of the Everson and Norma map units. This transect is located entirely on the east side of the "homesite path", and crosses portions of both the Kapowsin and Norma map units.

A total of 10 observation points were evaluated along the transect. In general the eastern most sampling points were sited within the Norma map unit and the western most (other than the northern most point of the transect) were sited within the Kapowsin map unit. At the northern end of the transect, three of the sampling points were in existing septic system test pits that were 3 to 4 feet deep. The area of Norma soils examined onsite is estimated to be about 3 acres; the area of Kapowsin soils east of the "homesite path" is estimated to be about ¼ to 1 acres.

The Norma map unit, like the Everson, is a hydric soil. In order to be classified as a PFL soil, it has to be drained. There was no evidence of surface drainage within this area of the site. That alone, according to the current field based protocol would be enough to remove this area from LTA inclusion. In addition, of the ten points examined, seven had surface cobbles or stones within 6 inches of the soil surface, and one had evidence of a shallow water table and root restrictive layers within 6 inches of the soil surface. Surface soils throughout this area of the site were fairly consistent, and were more typical of the Kapowsin series, so would be considered as inclusions within the Norma map unit. In any event, the surface and near-surface coarse fragment content alone would exclude this area 3-4 acre area from being classified as PFL, and by extension, LTA consideration.

A third and final surface-only transect was located running west of the "homesite path" downslope through a Kapowsin soil map unit. The transect extended 175 feet west from the path, to what appeared to be a wetland edge. Of the 6 test points examined along the transect, two had surface evidence that could immediately exclude them from being classified as PFL, and therefore would exclude them from LTA consideration. One of those points had surface cobbles and the other had evidence of a shallow water table within 12 inches of the surface.
Conclusions
If we sum up the acreage of onsite wetland areas (~12 acres), and the two areas with cobbly or stony surface soils in Map Unit 36, Map Unit 50, and Map Unit 76 (~9 acres), it is readily apparent that more than half of the study site (at least 21-22 acres) would not be classified as PFL, and therefore, would not meet LTA standards. This is a conservative calculation, considering that we expect (based on recent field reconnaissance results on other nearby properties in and adjacent to Yelm Meadows) that most of the eastern two thirds of the study site has either 1) > 10% surface cobbles or stones, or 2) has a seasonal high water table within 12 inches of the soil surface. In addition, one could argue that since neither the Norma nor the Everson map units have drainage infrastructure (intended to lower the seasonal water table) the onsite areas mapped as such (measuring approximately 27-28 acres) should not have been included in the initial screening for LTA consideration because they are not drained; a requirement to be classified as PFL.

Therefore, based on standards for PFL soil classification and based on standard field based protocols accepted by both the NRCS and Thurston County, we recommend that Lot 2 be removed from the LTA zoning map.

Other Considerations and Discussion
As described in Thurston County’s code, the Growth Management Act (GMA: RCW 36.70A.160) requires counties to designate agricultural lands that provide long-term commercial significance. A Washington Supreme Court case from 2006\(^7\) clarified the definition of ‘agricultural lands’ with the following (with our emphasis added):

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\(^7\) Lewis County v. Hearings Bd., 157 Wn.2d 488 (2006)
"...we hold that agricultural land is land: a) not already characterized by urban growth b) that is primarily devoted to the commercial production of agricultural products..., including land in areas used or capable of being used for production based on land characteristics, and c) that has long-term commercial significance for agricultural production, as indicated by soil, growing capacity, productivity, and whether it is near population areas or vulnerable to more intense uses."

The decision also states that counties can use other additional criteria in establishing areas of long-term commercial significance.

A site would have to be characterized by all points of sections a, b, and c (note the use of the word ‘and’ in the definition) in order to meet the intent and requirements of the LTA program based on our interpretation of the above definition. And that appears to be a good definition if that State’s intent is to protect valuable, productive farmland from being converted to non-agricultural uses. Using this definition, only those areas with a predominance of prime farmland soils mapped onsite, in addition to meeting the requirements of the other 8 criteria listed in the Thurston County Comprehensive Plan, should be classified as LTA.

However, the Washington Supreme Court (WSC) further clarified the agricultural land definition for areas that do not possess prime soils. The 2006 decision determined that areas of existing, valuable long-term agricultural crops (such as Christmas trees, in that particular example) do not necessarily need to have prime soils onsite if they are otherwise shown to have long-term economic significance to the county. This ruling appears to potentially conflict with the requirement of the use of PFL soils information (...has long-term commercial significance for agricultural production as indicated by soil) outlined in the definition above.

If this rule is only applied to areas that are currently being managed to produce a valuable commercial agriculture product, the intent of the definition above and the LTA program is not completely lost. But if this concept is applied to all undeveloped land in Thurston County (or in any county), then ALL parcels would meet this criteria, since at a basic level, one could build a greenhouse or other farm product buildings on bedrock, and still produce a commercial agricultural product. We note that intensive agricultural activities (such as greenhouses, chicken farms or dairies) on poor soils often result in pollution of nearby waterways or soils. Therefore, if the intent of the LTA program is to protect valuable farmland soils, which in turn protects groundwater quality and quantity, then the program must focus on valuable soil properties first.

So while the Supreme Court ruling may help to protect existing valuable farming operations, the ruling does not provide an adequate test for determining which unfarmed areas that might be ‘capable of’ an agricultural use, and so actually merit protection. By removing prime farmland soils as the first step in the designation of valuable agricultural land (the test that IS used, as per WSC findings, for existing farms), a potentially dangerous precedent is set. Inappropriate designation as LTA lands could potentially lead to loss of and/or damage to important critical areas, such as wetlands, forest, prairie and associated habitats. While some of these areas are protected under other sections of the GMA, there are different federal, state and local review standards in place for agricultural lands relative to other land uses; i.e., a lower level of review
and/or less stringent protections. In addition, this result indicates that each section (a, b or c) of
the definition of agricultural lands can be applied independently rather than in combination, as it
appears to be written now – i.e., with the word ‘and’ connecting the three sections, not ‘or’.

It is recognized that the County might desire (or be compelled) to protect areas of existing
agricultural use that may not meet all current LTA criteria (such as having prime farmland soil
characteristics). Rather than adapting the LTA program to fit every need, we suggest for
farmlands with poor soils that are still providing some agricultural use, the County might
designate those areas as “Unique Farmland Areas of Thurston County” if they are associated
with a state-recognized valuable agricultural crop, such as Christmas trees or wine grapes. We
do recommend consulting with the State Soil Conservationist and Regional Soil Scientist from
NRCS to develop a list of the target crops and corresponding soil types. This additional layer in
the agricultural land classification process would need to be added to the Comprehensive Plan,
but would avoid mis-use of the primary intent of the LTA program – which is to protect areas
with valuable soils. We also recommend that “existing agriculture” be defined as being in-place
for at least the past 5-years, to ensure that a failing farm is not protected.

We also recommend that a different test be used to judge whether a property not currently in
agricultural use is “capable of” agricultural use. We suggest that those areas must meet all
requirements of the comprehensive plan (in this case all 9 criteria listed) in order to be initially
considered for LTA designation, and then that onsite work be carried out to verify that the soils
are correctly mapped. Having prime farmland soils onsite should be the most important factor in
identifying valuable agricultural lands, since that characteristic alone would indicate whether the
land is potentially capable of the most intensive and commercially successful agricultural uses.

Lot 2 of the Yeim Meadows subdivision falls under this latter scenario. The onsite soil
conditions do not meet requirements to be classified as PFL. The water table is too shallow in
some areas, and the soils are too cobbly and stony in others. In addition, the land has been
managed for forestry (not a Christmas tree farm), and not agriculture, for at least a couple of
decades (based on a review of aerial photographs on the TCGD system). Because the area has
not been used for commercial agriculture during at least the past 20 years, and because it does
not have soil characteristics that would indicate a potential for long-term commercial agricultural
viability, we conclude that the parcel should be removed from LTA consideration.

We hope this report provides enough information to proceed with project planning. Please call if
you have any questions or require additional detail or clarification on any of these issues.

Respectfully,

Daniel Uñar, Associate
SSSA Certified Professional Soil Scientist
APPENDIX I
THURSTON COUNTY SOIL SURVEY-BASED
PRIME FARMLAND MAP UNITS
### APPENDIX I

**Thurston County Soil Survey-based Prime Farmland Map Units**

<table>
<thead>
<tr>
<th>NRCS Map</th>
<th>Soil Series Name and Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>14</td>
<td>Bellingham silty clay loam (where drained)*</td>
</tr>
<tr>
<td>26</td>
<td>Chehalis silt loam</td>
</tr>
<tr>
<td>29</td>
<td>Dupont muck (where drained)*</td>
</tr>
<tr>
<td>31</td>
<td>Eld loam</td>
</tr>
<tr>
<td>36</td>
<td>Everson clay loam (where drained)*</td>
</tr>
<tr>
<td>37</td>
<td>Galvin silt loam, 0 to 5 percent slope</td>
</tr>
<tr>
<td>38</td>
<td>Giles silt loam, 0 to 3 percent slope</td>
</tr>
<tr>
<td>41</td>
<td>Godfrey silty clay loam (where drained)*</td>
</tr>
<tr>
<td>50</td>
<td>Kapowsin silt loam, 0 to 3 percent slope</td>
</tr>
<tr>
<td>64</td>
<td>Maytown silt loam</td>
</tr>
<tr>
<td>69</td>
<td>Mukilteo muck (where drained)*</td>
</tr>
<tr>
<td>70</td>
<td>Mukilteo muck (drained)*</td>
</tr>
<tr>
<td>71</td>
<td>Newberg fine sandy loam</td>
</tr>
<tr>
<td>72</td>
<td>Newberg loam</td>
</tr>
<tr>
<td>73</td>
<td>Nisqually loamy fine sand 0-3 percent slope**</td>
</tr>
<tr>
<td>75</td>
<td>Norma fine sandy loam (where drained)*</td>
</tr>
<tr>
<td>76</td>
<td>Norma silt loam, (where drained)*</td>
</tr>
<tr>
<td>86</td>
<td>Prather silty clay loam, 3 to 8 percent slope</td>
</tr>
<tr>
<td>88</td>
<td>Puget silt loam, (where drained)*</td>
</tr>
<tr>
<td>89</td>
<td>Puyallup silt loam</td>
</tr>
<tr>
<td>97</td>
<td>Salkum silty clay loam, 3 to 8 percent slope</td>
</tr>
<tr>
<td>100</td>
<td>Scamman silty clay loam, 0-5 percent slope (where drained)*</td>
</tr>
<tr>
<td>104</td>
<td>Semiahmoo muck (where drained)*</td>
</tr>
<tr>
<td>105</td>
<td>Shalcar muck (where drained)*</td>
</tr>
<tr>
<td>106</td>
<td>Shalcar Variant muck (where drained)*</td>
</tr>
<tr>
<td>107</td>
<td>Skipapa silt loam, 0-3 percent slope</td>
</tr>
<tr>
<td>115</td>
<td>Sultan silt loam</td>
</tr>
<tr>
<td>120</td>
<td>Tisch silt loam, (where drained)*</td>
</tr>
<tr>
<td>126</td>
<td>Yelm fine sandy loam, 0 to 3 percent slope</td>
</tr>
</tbody>
</table>

- * Hydric or wetland soil (only prime if drained — meaning that the wetland (hydric) soil has ditches or drain tiles that lower the water table during the growing season, so makes agriculture possible).

** Only prime where irrigated
APPENDIX II
PROJECT MAPS
Soils map with 2-foot elevation contours and 2006 aerial photo imagery. Data obtained from the Thurston County GeoData System.
Sketch of Habitat Technologies wetland delineation wetland coverage (we have labeled wetland areas with a blue W) in the vicinity of Lot 2—taken from the Yelm Meadows Future Roadway Improvements map that shows Thurston County’s expectations for road improvements in the area. Proposed road widths are per the 1999 Thurston County Road Standards.
Site evaluation map generated from Google Earth © maps showing GPS data points as orange bulls-eye.