MEMORANDUM (3)

TO: Thurston County Planning Commission

FROM: Maya Teeple, Associate Planner
       Allison Osterberg, Senior Planner

DATE: January 16, 2019

SUBJECT: Comprehensive Plan Update – Long Term Forestry Review and Options

Thurston County is currently updating the Comprehensive Plan. As part of the process, the Thurston County Board of County Commissioner’s approved a review of the Long-Term Forestry designation. Long-term forestry of commercial significance is a natural resource industry and falls within Chapter 3 of the Comprehensive Plan.

Currently, state Guidance on designation of forest resource lands states (WAC 365-190-060):

- Forest resource lands should be designated at county-level and not reviewed on parcel by parcel basis;
- Lands should be designated based on three factors:
  1. Not already characterized by growth;
  2. The land is used or capable of forestry production, based on their physical and geographic characteristics; and
  3. The land has long-term commercial significance. Counties and cities should determine which land grade constitutes forest land of long-term commercial significance, based on local physical, biological, economic, and land use considerations. Forest land of long-term commercial significance will generally have a predominance of the higher private forest land grades. However, the presence of lower private forest land grades within the areas of predominantly higher grades need not preclude designation as forest land.
- Counties may consider secondary benefits from retaining forestry operations, such as protecting air and water quality, maintaining adequate aquifer recharge areas, reducing forest fire risks, supporting tourism and recreational activities, providing carbon sequestration benefits, and providing wildlife habitat;
- Counties and cities must consider the effects of proximity to population areas and the possibility of more intense uses, including 1) availability of public services and facilities....
conducive to the conversion of forest land, 2) proximity to urban and suburban areas and rural settlements; 3) size of the parcels – forest lands consist of predominantly large parcels; 4) compatibility and intensity of adjacent and nearby land use and settlement patterns; 5) property tax classification, typically as open space or forest land pursuant to 84.33 or 84.34 RCW; 6) local economic conditions that may affect the ability to manage timberlands; 7) history of land development permits;

- When applying the above criteria, counties and cities should designate at least the minimum amount of forest resource lands needed to maintain economic viability for the forestry industry and to retain supporting forestry businesses.

Table 1: Does Thurston County currently address criteria required under WAC 365-190-060:

<table>
<thead>
<tr>
<th>Criteria for Designation under WAC 365-190-060</th>
<th>Addressed?</th>
</tr>
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<tbody>
<tr>
<td>(1) County-wide; not parcel by parcel</td>
<td>Yes.</td>
</tr>
<tr>
<td>(2a) Not already characterized by growth</td>
<td>Yes.</td>
</tr>
<tr>
<td>(2b) Used for forestry production</td>
<td>Yes.</td>
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<tr>
<td>(2c) Has long term commercial significance based on private forest and land grades</td>
<td>Yes.</td>
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<td>(3) Counties may consider secondary benefits</td>
<td>Yes.</td>
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<tr>
<td>(4) Counties may consider the proximity to population areas</td>
<td>Yes. Currently the County considers the following in our designation criteria:</td>
</tr>
<tr>
<td></td>
<td>1) Availability of public services</td>
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<td></td>
<td>2) Proximity to urban and suburban areas</td>
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<tr>
<td></td>
<td>3) Size of the parcels</td>
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<tr>
<td></td>
<td>4) Compatibility and intensity of adjacent and nearby land uses and settlement patterns</td>
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<td></td>
<td>5) Property tax classification</td>
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<td></td>
<td>6) Local economic conditions that may affect the ability to manage timberlands</td>
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<tr>
<td></td>
<td>7) History of land development permits</td>
</tr>
<tr>
<td>(5) Must designate the minimum to maintain economically viable</td>
<td>Yes.</td>
</tr>
</tbody>
</table>

Currently, the County Long Term Forestry designation is also a zone, and therefore determines the allowed uses that are permitted in the area. Long Term Forestry designation allows specific uses including forest practices, accessory uses, single family residences (limited under sections 20.08D.040, and 20.08D.045), storage of materials related to agriculture and forestry; low-intensity recreation and outdoor recreation facilities; watershed management facilities.

**Long Term Forestry Survey**

As part of the evaluation of the current designation criteria employed by Thurston County, staff conducted outreach to major forestry landowners to gather input on the current Long-Term Forestry
Thurston County Planning Commission, January 16, 2019
Comprehensive Plan Update – Chapter 3 – Natural Resources

Long Term Forestry Review

designation. Six individual landowners and companies were contacted including: a personal landowner currently designated LTF; CGVI, a forestry company designated and zoned as RRR 1/5; Green Diamond, a large timber company with both RRR 1/5 and LTF designations; Port Blakely, a timber company with RRR 1/5 and LTF designations; Weyerhaeuser, a timber company with RRR 1/5 and LTF designations; and Jorgensen, a timber company with RRR 1/5 designation.

Timber companies and landowners were asked a series of questions and then for any general feedback on forestry within Thurston County, and for any feedback on areas of improvement regarding forestry resources. The following survey questions were asked:

1. What is the primary management objective of this land?
2. What is the long-term plan for this land?
3. Is your current zoning/designation appropriate for this land?
4. Is the Long-Term Forestry designation (or RRR 1/5, if applicable), suitable for this land?

A summary of feedback from the forestry review is listed below.

1. One landowner contacted staff expressing interest in a land use amendment and associated rezone of a parcel from Long Term Forestry to Rural Residential Resource 1/5. The landowner has one parcel (13816230000) that is currently designated as LTF but is not actively used as forestry and hasn’t been in the history of ownership. This parcel appears from the 2015 aerial imagery that less than 40% has forest coverage. Additionally, the parcel is adjacent to a rural neighborhood. The property is not enrolled in open space. There have been 3 permits issued on the property since 1935. This property may be suitable for a land use amendment to RRR 1/5. Neighboring adjacent parcels (13816230200, 13816240000) may also be suitable for a land use amendment. More in section below.

2. CGVI is a rural forestry landowner in south Thurston County, with 14 parcels. Staff surveyed CGVI regarding several parcels that are currently designated as RRR 1/5 in south Thurston County near Tenino. A three-parcel block (12634410000, 12634420000, 12634430000) totaling 165 acres was considered for inclusion in the Long-Term Forestry designation. These parcels are intended for long-term forestry. However, the parcels are smaller in size than other Long-Term Forestry parcels in the County, and are fringe parcels (located on the edges). Forestry is currently a permitted use in RRR 1/5. Based on current LTF designation criteria, these parcels may meet the Long-Term Forestry designation, but are suitable to remain in RRR 1/5. Staff reviewed this block and evaluated it with the current designation criteria. The landowner has expressed interest in remaining RRR 1/5 at this time.

3. Large timber companies (Weyerhaeuser, Green Diamond, and Port Blakely) did not express any concerns with the current designation criteria for Long Term Forestry in the comprehensive plan.

4. Green Diamond and Port Blakely expressed concern that rural forest lands typically zoned as RRR 1/5 are at risk of conversion. Both companies suggested having tools available for these timber lands outside of LTF to remain protected from rural development, such as conservation easements, PDR, and TDR.
5. Jorgensen timber also expressed concern for risk of conversion of rural forest lands, but noted that for small timber companies, rural zoning can be beneficial. Rural forestry provides alternative options and secondary sources to cash flow if timber production is not profitable.

**Long Term Forestry Land Use Amendment Change - Options**

Staff conducted a high-level review of the fringe areas of the Long-Term Forestry designation. Staff identified blocks/parcels that appear to have a land use inconsistent with the current Long-Term Forestry designation, which were then cross-examined further with the current designation criteria. Areas within RRR 1/5 that appear to be used for forestry were also considered, but primarily identified for further review through landowner surveying.

Thurston County is currently considering a land use amendment and associated zoning change for seven parcels within the Long-Term Forestry land use designation. Three parcels (±165 acres) were considered for inclusion into the Long-Term Forestry designation, but are not presented as an option because the landowner expressed interest in remaining in RRR 1/5 at this time.

One parcel (Jeff Davis, 13816230000) contacted staff and requested site-specific review of their parcel as part of the Comprehensive Plan update. Consequently, the surrounding two parcels were also reviewed; all three parcels fall in a fringe area of the LTF designation. Additionally, four parcels were reviewed through a high-level assessment of fringe areas of the Long-Term Forestry designation. The seven parcels (±173.52 acres) being considered:

- Jeff Davis, 13816230000 (30.89 acres)
- Kurt Krueger, 13816230200 (6.74 acres)
- Lance Farr, 13816240000 (40.62 acres)
- Robert & Susanne Countryman, 09880001002 (5.71 acres)
- Scott & Elizabeth Neff, 13822130100 (9.56 acres)
- Damian Mahan, 21621300100 (40 acres)
- Damian Mahan, 21621200100 (40 acres)

Parcels were reviewed due to an indication of development/inconsistent use with the current land use designation, as interpreted from aerial imagery (Thurston County, 2015). The average parcel size for Thurston County’s Long-Term Forestry designation is 640 acres. Per Thurston County’s current designation criteria: favorable economic conditions include land grade 2 forest soils, which provide (in conjunction with large parcel sizes) the growth potential to manage timber lands for long-term commercial production.

**Summary of Parcels under Consideration**

Three parcels (13816230000, 13816230200, and 13816240000) are located approximately 4.8 miles west of Olympia and 4.25 miles west of the Olympia UGA. They are located north of State Highway 8 and Wilson Rd. NW, southeast of Summit Lake. Two of these parcels (13816230200 and
13816230000) are bordered to the south by Rural Residential Resource 1/5; the remainder of sides are bordered by Long Term Forestry. The third parcel (13816240000) is bordered on all three sides by Long Term Forestry. A powerline corridor currently runs through two of the parcels: 13816230000 and 13816240000.

Washington Department of Natural Resources owns the Long-Term Forestry parcels which surrounds these three parcels. The parcels range in size from 6.74 acres to 40.62 acres.

**Parcel 13816230200** is a 6.74 acre parcel. To the south, the parcel is bordered by RRR 1/5. To the east, west, and north, the parcel is bordered by Long Term Forestry. The parcel is not currently enrolled in Open Space. The parcel is a category 2 critical aquifer recharge area, and has mapped wetlands on 13% of the property. Steep slopes are also mapped on the property. There are 3 structures on the property. From aerials between 1996 and 2015, this parcel does not appear to have been used for timber harvest. Approximately 35% of the property is treed.

**Parcel 13816230000** is a 30.89 acre parcel. To the south, the parcel is bordered by RRR 1/5. To the east, west, and north, the parcel is bordered by Long Term Forestry. The parcel is not currently enrolled in Open Space. The parcel is primarily a category 2 critical aquifer recharge area with some category 3 and has mapped wetlands on 20% of the property (2018 Assessor’s Cost Valuation Report); steep slopes are also mapped on the property. There are 4 structures on the property. From aerials between 1996 and 2015, this parcel does not appear to have been used for timber harvest. Approximately 45% of this parcel is forested.

**Parcel 13816240000** is a 40.62 acre parcel. This parcel is bordered by Long Term Forestry on all sides. This parcel is currently enrolled in the Open Space – Designated Forest Lands program through the Assessor, meaning that the primary use of the land is growing or harvesting timber. The parcel is primarily a category 2 and 3 critical aquifer recharge area, and has mapped wetlands on 2% of the property; steep slopes are also mapped on the property. The property currently has a forest grade of 3 for 37.05 acres, and a forest grade of 8 for 3.57 acres. There are no structures on the property. More
than half of this property is currently forested, with the exception of the utility corridor through the center of the property.

The remaining four properties were reviewed through a high-level review of fringe areas of the Long-Term Forestry designation. Staff reviewed aerial imagery with the Thurston County zoning layer, and for parcels in the fringe areas of LTF that appeared to be developed, further evaluated each parcel against the current designation criteria for long-term forestry.

The four parcels are all located outside of the Urban Growth Areas. Two parcels (13822130100 and 09880001002) are located in the western part of the county, in the Long Term Forestry block with Capitol Forest. The other two parcels (21621300100 and 21621200100) are located in the southeastern portion of the county, south of Vail Cut Off road SE.

Parcel 09880001002 is a 5.71 acre parcel that is located 4.1 miles from the Tumwater UGA. This parcel is bordered by Long Term Forestry on the north, east and west owned by the State of Washington. To the south, the parcel is bordered by Rural Residential Resource, 1/5. The parcel is not currently enrolled in Open Space. There are 4 structures on the property built between 1972 and 2005. The parcel south is currently used as residential. The Cost Valuation Report (Assessor’s data 9/18/2018) does not list any forest grade for the parcel. Approximately 35% of the property is forested.
Parcel 13822130100 is a 9.56 acre parcel, located approximately 3.6 miles west of the Olympia UGA. To the south, north, and west, the parcels are bordered by Long Term Forestry lands owned by the Department of Natural Resources. To the east, the parcel is bordered by RRR 1/5. The parcel is not currently enrolled in Open Space. The landowner currently harvests resources for non-commercial purposes and may intend to use a portion of the site for recreation in the future. There are 3 structures on the property built between 1990 and 2013. The parcel eastward has 3 structures. The Cost Valuation Report (Assessor’s data 9/18/2018) does not list any forest grade for the parcel. The property appears to be 60% forest cover.

Parcel 21621300100/21621200100. These two parcels are each 40 acres, located approximately 1 mile south of the Rainier UGA. To the west, the parcels are bordered by Long Term Forestry lands owned by Weyerhaeuser. To the south, the parcels are bordered by Thurston County parkland. To the east and north, the parcels are bordered by RRR 1/5 land that is currently undeveloped except for a barn on the parcel to the east. Both parcels are currently enrolled in Open Space as Current Use Agriculture. There are no structures on the properties. Additionally, there are no structures on the properties to the north, west and south. There is a barn on the property to the east. The Cost Valuation Report (Assessor’s data 9/18/2018) does not list any forest grade for the parcels. There appears to be minimal forest cover on the property.
Staff contacted property owners of the three parcels by mail on December 13, 2017 regarding the consideration of a land use amendment. Signed return receipts were received from Kurt Krueger (13816230200) and Jeff Davis (13816230000). Both letters to Lance Farr (13816240000) were unable to deliver to addressee and returned to the county. Staff met with the landowners of 13816230200 on January 5, 2018 and discussed the land use amendment change under consideration and the broader comprehensive plan process. Additionally, property owners of the remaining four parcels were contacted by mail on September 26, 2018 regarding the consideration of a land use amendment. Property owners from parcels 21621300100, 21621200100 and 13822130100 responded by phone. Robert and Susanne Countryman, owner of parcel 09880001002, received the letter (confirmed through return-receipt), but did not follow up through any contact with the County. Below is a summary of landowner responses.

Table 2: Landowner Contact and Response

<table>
<thead>
<tr>
<th>Parcel</th>
<th>Option</th>
<th>Landowner Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>13816230000</td>
<td>F-1</td>
<td>Supportive of removal from LTF</td>
</tr>
<tr>
<td>13816230200</td>
<td>F-1</td>
<td>Unsupportive of block removal from LTF</td>
</tr>
<tr>
<td>13816240000</td>
<td>F-1</td>
<td>Letter mailed, returned; Unable to contact</td>
</tr>
<tr>
<td>09880001002</td>
<td>F-2</td>
<td>Letter mailed &amp; received</td>
</tr>
<tr>
<td>13822130100</td>
<td>F-3</td>
<td>Letter mailed &amp; received</td>
</tr>
<tr>
<td>21621200100 &amp; 21621300100</td>
<td>F-4</td>
<td>Supportive of removal from LTF</td>
</tr>
</tbody>
</table>

OPTIONS (F) FOR LONG TERM FORESTRY REVIEW:

Consideration 1: 3 Parcel Block North of Highway 8 (13816230000, 13816230200, and 13816240000)

Option 1 considers three parcels reviewed in the northwestern quadrant of the county: 13816230000, 13816230200, and 13816240000.

F-1(A) No Change: Maintain all parcels as current land use: Long Term Forestry

This option would maintain all of three parcels under the Long-Term Forestry land use designation and associated zone.

Pro:
- Maintains current Long-Term Forestry base and block size;

Con:
- Some parcels do not meet all the designation criteria for Long Term Forestry;
- Forestry not a current use of two of the parcels in question.

F-1(B) Amend Land Use for three parcels from LTF to RRR 1/5

This option would amend the land use of three parcels to RRR 1/5.

Pro:
Proposed land use is consistent with neighboring parcels to the south;
Maintains resource use (i.e., forestry or agriculture) as a primary use;
Reflects current use of two of the properties more accurately;
Protects rural character;

Con:
May lead to further growth, subdivisions or lots that encroach on LTF block;
Minimizes current Long-Term Forestry base and block size by 78.25 acres.

**F-1(C) Amend land use for 2 parcels from LTF to RRR 1/5**
This option would amend the land use of two parcels (Kurt Krueger – 13816230200; and Jeff Davis – 13816230000) to RRR 1/5.

Pro:
- Proposed land use is consistent with neighboring parcels to the south;
- Maintains resource use (i.e., forestry or agriculture) as a primary use;
- Reflects current use of the properties more accurately;
  - Parcel 13816230200 and 13816230000 currently used for residential.
  - Parcel 13816240000 currently partially forested with a utility corridor.
- Maintains rural character;

Con:
- May lead to further growth, subdivisions or lots that encroach on LTF block;
- Minimizes current Long Term Forestry base and block size by 37.63 acres.

Staff also considered two additional options to amend the land use of the parcels from Long Term Forestry to Rural 1/10 and Rural 1/20. The parcels under consideration do not meet the purposes in the Comprehensive Plan for the land use designation descriptions for R 1/10 or R 1/20, and thus were not included as options.

**Consideration 2: Consideration of 1 Parcel: 09880001002**

**F-2(A) No Change: Maintain parcel as current land use: Long Term Forestry**
This option would maintain parcel 09880001002 under the Long-Term Forestry land use designation and associated zone.

Pro:
- Maintains current Long-Term Forestry base and block size;

Con:
- Parcel does not meet all the designation criteria for Long Term Forestry;
- Forestry not a current use of the parcel in question.

**F-2(B) Amend Land Use of parcel from LTF to RRR 1/5**
This option would amend the land use of parcel 09880001002 to RRR 1/5.
Pro:
- Proposed land use is consistent with neighboring parcels to the south and east;
- Maintains resource use (i.e., forestry or agriculture) as a primary use;
- Reflects current use of the property more accurately;
- Protects rural character;

Con:
- May lead to further growth, subdivisions or lots that encroach on LTF block;
- Minimizes current Long-Term Forestry base and block size by 5.71 acres.

**Consideration 3: Consideration of 1 Parcel: 13822130100**

**F-3(A) No Change: Maintain parcel as current land use: Long Term Forestry**
This option would maintain parcel 13822130100 under the Long-Term Forestry land use designation and associated zone.

**Pro:**
- Maintains current Long-Term Forestry base and block size;
- Parcel has greater than 60% forest cover and could be returned to forestry use;

**Con:**
- Parcel does not meet all the designation criteria for Long Term Forestry;
- Forestry not a current use of the parcel in question.

**F-3(B) Amend Land Use of parcel from LTF to RRR 1/5**
This option would amend the land use of parcel 13822130100 to RRR 1/5.

**Pro:**
- Proposed land use is consistent with neighboring parcels to the east;
- Maintains resource use (i.e., forestry or agriculture) as a primary use;
- Reflects current use of the property more accurately;
- Protects rural character;

**Con:**
- Parcel has greater than 60% forest cover and could be returned to forestry use;
- May lead to further growth, subdivisions or lots that encroach on LTF block;
- Minimizes current Long-Term Forestry base and block size by 5.71 acres.

**Consideration 4: Consideration of 2 Parcels: 21621200100 and 21621300100**

**F-4(A) No Change: Maintain parcel as current land use: Long Term Forestry**
This option would maintain parcels 21621200100 and 21621300100 within the Long-Term Forestry land use designation and associated zone.
Pro:
- Maintains current Long-Term Forestry base and block size;

Con:
- Parcels do not meet all the designation criteria for Long Term Forestry;
- Forestry not a current use of the parcels in question.

**F-4(B) Amend Land Use of parcel from LTF to RRR 1/5**
This option would amend the land use of parcels 21621200100 and 21621300100 to RRR 1/5.

Pro:
- Proposed land use is consistent with neighboring parcels to the north and east;
- Maintains resource use (i.e., forestry or agriculture) as a primary use;
- Reflects current use of the property more accurately;
- Protects rural character;

Con:
- May lead to further growth, subdivisions or lots that encroach on LTF block;
- Minimizes current Long-Term Forestry base and block size by 80 acres.

**Attachments:**
Attachment A: Countywide Map of Considerations
Attachment B: Map Options 1-4
Attachment C: Land Use Designation Criteria Crosswalk