

2-2000

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R-61-1-33



DAHLEN PROPERTY
T18S-R4W-SEC 24

EXHIBIT 5

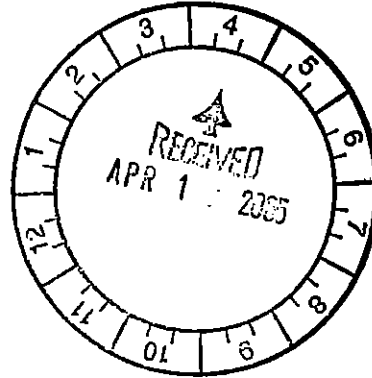
2000 PHOTO

HERSHNER HUNTER^{LP}

STEVE CORNACCHIA
scornacchia@hershnerhunter.com

April 18, 2005

Lane County Planning Commission
125 E. 8th Avenue
Eugene, OR 97401



Re: PA 04-6092 (Dahlen)
Our File No. 22186.30005

Dear Commissioners:

We represent Karen Dahlen regarding PA 04-6092. This letter provides the Lane County Planning Commission, and the record of this proceeding, with additional testimony and evidence regarding the provisions of ORS 197.247, specifically the farm and forest income tests (ORS 197.247(1)(a) and the forest productivity test (ORS 197.247(1)(a)). Opponents of the application have recently raised several issues regarding the tests and this letter provides the applicant's response to the arguments contained in those issues.

Recently raised issues include the following:

- **The applicant's demonstration of compliance with the forest income test is incomplete because it does not include an analysis of the adjoining 67 acres in common ownership (Moshofsky) during the 1978-1983 test period of ORS 197.247(1)(a);**
- **The affidavits of Mr. Moshofsky, dated April 15, 1997 and December 17, 2003, did not take into account the grazing of cattle that occurred on the subject property during the 1978-1983 test period;**

BCC #9 - 21 pp.

- **The applicant's demonstration of compliance with the forest income test did not include all Moshofsky-owned property and mills existing during the 1978-1983 test period.**

ORS 197.247(1)(a) forest income test analysis of entire 387.65 acres in common ownership during the 1978-1983 test period.

In response to this issue, the applicant requested that the consulting forester, Marc Setchko, conduct an additional forest income analysis of the subject property, to include the entire 387.65 acres of common ownership in 1983. Enclosed herewith are copies of a report issued by Marc Setchko, dated March 27, 2005. In that report Mr. Setchko calculates the average gross annual income of the property through a complete rotation. He calculates what the forest operation on the subject property was capable of, in terms of income, based on actual stocking of the property during the 1978-1983 period. His calculation is based upon the actual volume of timber removed from the property in 1990 by Mr. Moshofsky (Mr. Moshofsky's affidavit of that timber removal, dated March 15, 2005, is attached hereto as Exhibit A) and a timber cruise of the remaining portion of the property containing stands of merchantable Douglas Fir conducted by Mr. Setchko. Included in Mr. Setchko's report is a map of the property with areas of timber harvest and existing stands of merchantable Douglas Fir delineated. Mr. Setchko's earlier reports, currently in the record of this proceeding, and incorporated herein by this reference, demonstrate that significant portions of the property have not had any merchantable trees growing thereon for at least 50 years, due primarily to the steep, rock-laden, barren slopes of the northern portion of the property and the continually moist bottom land throughout the middle of the property. Those areas of the property contain poor soils for timber production (138G, 52 D, and 28C) as shown in Mr. Setchko's numerous reports in the record of this proceeding. The record of this proceeding includes aerial photos of the property, dated back to 1952, that display that those same areas have been devoid of any trees, merchantable or otherwise, long before the 1978-1983 period and continue to this day to be devoid of trees. Mr. Setchko was not required to make any assumptions on stocking levels in his analysis and calculations—he used the actual condition of the property during the applicable time period and its ability, at that time, to produce forest income over the growth cycle of the merchantable stands of timber existing at that time.

The applicant asserts that the income capability of the property in this case can be calculated by actual stocking conditions of the property before, during and after the applicable 1978-1983 period. Mr. Setchko's analysis and calculations of the actual timber available for harvest, throughout the growing cycle, demonstrates that the entire property was and is not capable of producing over \$10,000.00 in annual income over the growing cycle from a forest operation.

Grazing of cattle on the subject property during the period 1978-1983.

Mr. Moshofsky's earlier affidavits regarding the absence of farm operations on the subject property during the period 1978-1983 did not take into account an informal agreement with a third party that allowed a limited number of cattle to graze upon the subject property. Mr. Moshofsky has clarified the earlier affidavits with his affidavit, dated March 15, 2005 (Exhibit A). In that affidavit, Mr. Moshofsky makes it very clear that the cattle grazing occurred for the purpose of establishing a human presence on the property during his absence, apparently to dissuade trespassing and interloping on the property during that absence. Mr. Moshofsky's affidavit also demonstrates that the grazing of the cattle never produced anywhere near \$20,000.00 in annual income. Mr. Moshofsky's testimony that he did not manage the property for any other farm use during the 1978-1983 period and that the cattle grazing never produced \$20,000.00 in annual income demonstrates the applicant's compliance with the ORS 197.247(1)(a) income test for farm operations. In other words, at no time during the applicable period did any farm operation actually produce more than \$20,000.00 annually. Therefore, the property was not managed as part of a farm operation capable of producing that same amount and the test of the statute is satisfied.

All Moshofsky-owned property and mills existing in the world during the 1978-1983 test period must be included in the application of the income test.

Goal One Coalition raised this issue in its letter to the Commission, dated February 25, 2005. The letter provides no authority for the proposition that the legislature intended the statute to cover all land and industrial operations, wherever located on the planet, of an individual in the analysis of what the subject property could contribute to the forestry economy of the state. The legislative history of the statute is clear that the legislature was attempting to address certain properties and their ability to contribute significantly within a snapshot in time (using the 1978-1983 time period). Lane County's 1997 interpretation of the statute, currently in the record as Exhibit D. to the application, provides that "the law creates a general presumption that all **contiguous** land owned during 1978-82 was part of the owner's 'operation' (emphasis added)." The interpretation includes no direction that non-contiguous property or operations of the applicant be considered in the income analysis. Lane County has consistently required Marginal Lands applicants to address the income tests on a contiguous property basis only. That requirement is an objective criteria authorized by ORS 197.247(5).

Not only has Lane County not required that all of the applicant's lands or operations in other counties or states be considered in the analysis, but to do so is so unreasonably beyond what the legislature intended to require in the statute. If the legislature had intended such a result, which could place worthless property (from a resource perspective) of a larger, non-contiguous, ownership in a totally unusable condition, it would have stated such an intent in

the body of the statute. Goal One's assertion that the income capability analysis of a particular piece of property must include all other lands and operations owned by the property owner defeats the intent of the legislature to capture particular, non-contributing, properties and to allow both residential and resource use of them through application of the Marginal Lands statute. Goal One's assertion in this issue is without any legal foundation, is supported by no substantial evidence of its requirement and should be rejected by the Commission.

Mr. Setchko does not provide substantial evidence concerning forest productivity.

This issue is included in the February 22, 2005, Goal One Coalition letter to the Commission and is a restatement of its assertion earlier in the proceeding. The applicant has addressed this issue in our letter to the Commission, dated February 15, 2005, and incorporates, by this reference, the responses therein. Mr. Setchko has responded to the arguments of Goal One Coalition in his letters contained in the record of this proceeding, dated February 23, 2004, April 8, 2004, February 15, 2005, and March 27, 2005 (a copy of which is enclosed herewith).

Once again, as we asserted in our earlier letter, Goal One Coalition is either confusing forest productivity with forest income capability or is deliberately attempting to confuse the proceedings by making both of the ORS 197.247 tests (income capability of subparagraph (1)(a) and forest productivity of subparagraph (1)(b)(C)) into productivity tests that require using the same evidentiary basis for analysis. The tests and the manner in which compliance with the tests is demonstrated are separate and distinct. Not only are these Goal One Coalition assertions confusing to the proceeding, they are without merit. Furthermore, its assertion on page 3 of its letter is just plain wrong. It states "The subject property is designated as forest land and is zoned for forest use." No, it is not. It is designated as agricultural land and zoned Exclusive Farm Use. Goal One Coalition's incorrect assertion in this issue only serves to confuse the proceedings and, like the remainder of its assertions, must be rejected as unfounded, unsupported and without merit.

Mr. Setchko fails to explain the use of 1983 prices.

Goal One Coalition is correct in asserting that the calculation of the annual gross income for the ORS 197.245(1)(a) income test can be accomplished by the use of timber values. However, it is incorrect in its assertion that the calculation must use timber prices other than 1983 prices.

Mr. Setchko used 1983 Douglas-fir log prices and volumes in his calculation of the projected gross forest operation income of the proposed marginal land. In this case Mr. Setchko is the

qualified expert with 27 years of forest management experience, including 17 years as a private consultant and a Master's Degree in Forestry. Goal One Coalition has not established that it has any experience or credentials in forest management. Furthermore, it has not provided any testimony from a qualified expert in forest management to support its assumptions and conclusions.

Lane County, in response to and in reliance upon *DLCD v. Lane County*, 23 Or LUBA 33 (1992), issued its interpretations of the Marginal Lands statutes in the Board of Commissioners' 1997 Supplement to Marginal Lands Information Sheet. A copy of the supplement and the information sheet is in the record of this proceeding. It is a binding policy statement providing guidance and direction to applicants, staff, the public and to the Lane County Planning Commission and Board of Commissioners regarding the statute. The Board direction stated in ISSUE 4 of the supplement provides:

“ISSUE 4: What price date should be used to calculate gross annual income for forest lands?”

Board's Direction:

The legislative intent of the “management and income test” of the Marginal Lands

Law was to identify those lands which were not, at the time the Marginal Lands law was enacted (1983), making a “significant contribution” to commercial forestry. Therefore, it is appropriate and statistically valid to use the following methodology:

1. Based on the best information available regarding soils, topography, etc., determine the optimal level of timber production for the tract assuming reasonable management.
2. Assume that the stand was, in 1983, fully mature and ready for harvest.
3. **Using the volumes calculated in step (1), and 1983 prices, calculate the average gross income over the growth cycle.”** (Emphasis added)

The Board's direction to use 1983 prices was an essential and reasonable approach to determining the productivity of forest lands at that time and obviates the need to make annual adjustments for inflation as the years go by (by adjusting the \$10,000 income figure). That direction is also consistent with the statute. ORS 197.247(5) provides:

“A county may use statistical information compiled by the Oregon State University Extension Service or other objective

criteria to calculate income for the purposes of paragraph (a) of subsection (1) of this section.” (Emphasis added)

In Issue No. 4 of the 1997 Interpretation Lane County established the timber price criteria for addressing the income test of the statute. The timber price criteria is an objective criteria with an adequate and reasonable foundation. The establishment of the timber price criteria is an act authorized by the Oregon Legislature by its enactment of the legislation creating the statute.

Ignoring the authority to use objective criteria granted to the county by the Oregon Legislature, Goal One Coalition wants the analysis process of the income test to change to favor its opposition to the designation of lands as Marginal Lands. While it opines that the analysis should use ever-changing (and ever-increasing) timber prices, usually increasing over time with inflation, it does not suggest that the \$10,000 income threshold of the statute also be adjusted over time for inflation. Taking the Goal One Coalition argument to its most ridiculous conclusion, eventually inflation will drive timber prices to a point when no land would be able to meet the \$10,000 test. Even the strictest reading of the statute results in a conclusion that the Oregon Legislature did not intend for a gradual and eventual phasing-out of the Marginal Lands designation process over time as inflated timber prices outstripped the \$10,000 income test. That same strict reading results in a reasonable conclusion that, by including the time period and income threshold in the statute, the Legislature was establishing the base criteria (setting the goal posts) for the analysis as a snapshot in time (1978-1983) which corresponds to the 1983 session that created the Marginal Lands statute. As the county states in its interpretation, “the legislative intent of the ‘management and income test’ of the Marginal Lands Law was to identify those lands which were not, at the time the Marginal Lands law was enacted (1983), making a ‘significant contribution’ to commercial forestry.” To suggest that the Legislature intended for the goal posts to move every time the nation experienced an inflationary period and for those goal post to eventually be torn down as a result of inflation is as “absurd” as Goal One Coalition’s description of the county’s interpretation.

Mr. Setchko’s use of 1983 prices to determine average annual gross income is consistent with Lane County interpretations and policy and is directed by the Board of Commissioners’ binding local level policy statement in the aforementioned supplement. Using the objective criteria established by Lane County pursuant to the statute, Mr. Setchko has determined that the subject property was not capable of being managed for forest operations producing at least \$10,000 in annual gross income. Mr. Just has provided no evidence that contradicts Mr. Setchko’s conclusions.

The use of 1983 log prices in the income test has been adequately and reasonably explained by the applicant, the forester and Lane County. The argument suggesting otherwise is without foundation, support or merit and should be rejected for those reasons.

Mr. Setchko fails to explain his use of a 50-year growth cycle.

In Issue No. 4 of the 1997 Interpretation, Lane County established the rotation criteria for addressing the income test of the statute. The rotation criteria is an objective criteria with an adequate and reasonable foundation. The establishment of the rotation criteria is an act authorized by the Oregon Legislature by its enactment of the legislation creating the statute. That act is authorized by ORS 197.247(5) and is consistent with the statute. (See earlier discussion of the use of 1983 timber prices)

The accompanying property line adjustment cannot be approved.

This issue was raised by Goal One Coalition in its letter to the Commission, dated February 22, 2005. Once again, Goal One Coalition has asserted an issue and failed to provide any legal foundation, authority or substantial evidence to support its assertion. It tries to use ORS 92.190(3) to support its argument that Lane County did not meet applicable approval criteria in approving the legal lot determination of the subject property as configured pursuant to the property line adjustment. However, while Lane County issued a legal lot determination, it did not approve of the adjustment, and is not required to regulate or approve that or any other property line adjustment. Goal One Coalition makes a huge leap from that Lane County legal lot action to asserting that Lane County must approve property line adjustments and must approve them in a manner prescribed by Oregon statutory provisions (ORS Chapter 92). That assertion is without merit. Goal One Coalition's reliance on ORS 92.190(3) to support its assertion is misplaced. The statute does not require local government regulation or approval of property line adjustments. What it says is that during a county's approval of an adjustment it may use certain procedures. In other words, if a county regulates and approves adjustments it may perform that regulatory function in a certain way. It does not say, and no Oregon statute says, that a county is required to regulate or approve such adjustments.

Lane County does not regulate property line adjustments and is not required to do so by Oregon law. Goal One Coalition is without any legal authority to support its assertion otherwise.

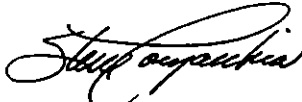
Conclusion

Throughout the record of this proceeding, and with the inclusion therein of the information and argument contained herein, the applicant has demonstrated that the designation of subject property as Marginal Land complies with ORS 197.247 and all other applicable criteria. Throughout the proceeding Goal One Coalition has presented issues and arguments that are without legal foundation, are not supported by substantial evidence and are without

Lane County Planning Commission
April 18, 2005
Page 8

merit. Therefore, the Commission should recommend to the Lane County Board of Commissioners that the application be approved.

Best regards,



STEVE CORNACCHIA

PSC:ss
Enclosures

Cc: Karen Dahlen (with enclosures)



Marc E. Setchko
CONSULTING FORESTER

870 Fox Glenn Avenue
Eugene, Oregon 97405
Phone: (541) 344-0473
FAX: (541) 344-7791

March 27, 2005

**FOREST PRODUCTIVITY
& INCOME ANALYSIS**
for
Dahlen Trust

SUBJECT PARCEL:

**ASSESSORS MAP NO. 18-04-24, TL #300: ±320.492 acres and
ASSESSORS MAP NO. 18-03-19, TL #1300: ±67.16 acres**

QUALIFICATIONS: Society of American Foresters Certified Professional Forester (#2953), with 27 years of experience including 17 years as a consultant, with Bachelor of Science (Cal Poly, SLO) and Master of Forestry (Oregon State) Degrees. As a consultant I have extensive experience in all phases of forestry, including drawing up forest management plans, handling the administration of these plans and maximizing the return to my clients. My productivity analyses are based on sound and "reasonable" forest management practices. This includes carrying out activities in a manner which generates a long term profit, rather than a loss. There are management activities which could be carried out which could benefit a forest operation but result in a loss to the owner. For these reasons all productivity analyses must be conducted from the standpoint of "reasonable forest management" practices.

I. SUMMARY

An evaluation of the site, from a timber productivity and income producing standpoint is reviewed in this analysis, in order to determine if the parcel meets the criteria for marginal lands designation. The analysis will show that the subject property qualifies for the following reasons:

1. The income generated from the subject property averages less than \$10,000/year, based on 1978 through 1983 log prices. This level of income meets the following statutory test for Marginal Lands: ORS 197.247 (1)(a) "The proposed marginal land was not managed during three of the five calendar years preceding January 1, 1983, as part of a ... forest operation capable of producing an average, over the growth cycle, of \$10,000 in annual gross income."

The income test must be calculated for the entire parcel (±387.65 acres), which includes both tax lots (#300 & #1300), as it existed for the five calendar years preceding January 1, 1983.

2. The subject property produces less than 85 cu.ft./ac./yr. of merchantable timber volume. This has been determined by Lane County, and the State of Oregon, to be the measuring parameter for marginal soils west of the Cascade Range; as defined in ORS 197.247 (1) (b) (C).

The productivity test must be calculated on the parcel, or portion(s) of the parcel, which is being submitted for marginal land designation. On the Dahlen parcel this includes tax lot #300, totaling ±320.492 acres. This test was addressed in my February 15, 2005, letter submitted previously.



Six tables are presented in my February 15, 2005, letter; these tables show a productivity range of 26 to 77 cubic feet per acre per year for the parcel. Goal One also submitted a table showing a productivity of 71 cubic feet per acre per year. To sum up; seven tables have been submitted regarding the potential productivity of the Dahlen parcel, all of them show the parcel is not capable of 85 cubic feet per acre per year.

II. RESULTS OF INCOME CALCULATIONS

Average Gross Annual Income Through A Complete Rotation

The income figures were calculated using the following data:

1. The **actual** timber volume growing on the property. These figures were obtained by two methods. Using actual cutout (scaled, or measured, volume removed) data from when past logging was done on the parcel and cruising (the method for measuring the merchantable volume in a stand of timber) the standing trees to determine the volume that is **actually** growing on the parcel at the present time. This cutout volume and the cruised volume were added together to calculate the total volume for the entire parcel. The volume figures obtained by these methods are expressed in thousand board feet (MBF).

The income test can only be calculated using volume figures expressed in thousands of board feet, because this is how timber is purchased by mills buying timber. Although some timber is purchased by the ton, this is primarily low value pulpwood. Timber is not purchased by the cubic foot, the measurement used for potential productivity of a soil.

The actual recorded cutout data from logging conducted approximately 14 years ago is available and will be submitted by Mr. Steve Cornacchia. This data can then be combined with the volume left on the property at the present time to come up with a total merchantable volume on the parcel.

Ideally all of the merchantable timber should be cruised at the same point in time, preferably at rotation age. However, since a large portion of the timber was logged in the past (1990-91), the volume removed then must be added to the volume left at the present time. This should actually show considerably **more** volume than existed at the time of logging, due to 14 years of growth adding merchantable volume onto the remaining trees. This means the totals used for this analysis are actually **higher** than what the volume would be if the entire property had been cruised **before** any logging took place. In other words, the figures shown below are much more optimistic than if the merchantable volume was calculated at a single point in time. The trees logged 14 years ago were 45-60 years old; the trees cruised at the present time are 50-70 years old. This type of age variation is normal, even in stands which were originally planted in the same year. This is due to natural seeding in, mortality and trees replacing other trees. Using these numbers will present a figure representative of a 50 year rotation, the standard accepted by Lane County.

For the total board foot volume I have used a combination of the recorded volume logged and the cruised volume from a March, 2005 timber cruise of the entire parcel. The areas logged and cruised are delineated on the aerial photo attached as Exhibit 1.

Total Merchantable Volume:

Douglas-fir -- 900 MBF (thousand board feet) logged by Moshofsky (see Exhibit 2)
711 MBF from timber cruise completed in March, 2005 (see Exhibit 3)
Ponderosa Pine -- 34 MBF from timber cruise completed in March, 2005 (see Exhibit 3)

For the 900 MBF logged by Moshofsky I have used the breakdowns listed below for grades.

A 50 year old stand on this site should have approximately 40% 2 SAW, 50% 3 SAW and 10% 4 SAW. If anything, these grade estimates err on the high side. In all probability there would be less 2 SAW and more 4 SAW. However, these figures are used to represent the highest possible log price scenario for the applicant.

Total Volume - Logged Volume - Douglas-fir -- 900 MBF (thousand board feet)

360 MBF of 2 SAW @ <u>\$255/MBF*</u>	\$ 91,800
450 MBF of 3 SAW @ <u>\$215/MBF*</u>	96,750
90 MBF of 4 SAW @ <u>\$200/MBF*</u>	<u>18,000</u>
Total Gross Value	\$206,550

*See Exhibit 4.

The value for the merchantable volume still growing on the parcel was determined by using the grade breakout from a timber cruise completed in March, 2005 (see Exhibit 2). To present the most optimistic scenario possible I have lumped the rough 3M grade (which is worth approximately 40% of the 2M grade) with the 3M grade. This will show a higher value than what a mill would have paid, because a large portion of the timber on the property is rough, lower value wood. This is typical of stands growing on poor sites (such as the Dahlen parcel), with hardwoods such as oak scattered throughout the conifers. Conifer growing intermixed with high percentages of hardwoods are much more likely to be deformed from growing up through the hardwoods and have large limbs due to high numbers of open grown trees. The highest quality wood comes from fully stocked **pure** stands of conifer. The rocky (in many areas boulder fields are present on the surface) areas and shallow, poor soils are not conducive to growing pure stands of conifer. There are many hardwoods, the majority of which are noncommercial, which will outcompete conifers in this type of growing condition.

Total Volume - Cruised Volume - Douglas-fir -- 711 MBF (thousand board feet)

173.2 MBF of 2 SAW @ <u>\$255/MBF*</u>	\$ 44,166
435.8 MBF of 3 SAW @ <u>\$215/MBF*</u>	93,697
102.0 MBF of 4 SAW @ <u>\$200/MBF*</u>	<u>20,400</u>
Total Gross Value	\$158,263

*See Exhibit 4.

Total Volume - Cruised Volume - Ponderosa Pine -- 33.9 MBF

20.5 MBF of 4 SAW @ <u>\$250/MBF*</u>	\$ 5,125
13.0 MBF of 5 SAW @ <u>\$180/MBF*</u>	2,340
0.4 MBF of 6 SAW @ <u>\$150/MBF*</u>	<u>60</u>
Total Gross Value	\$7,525

*See Exhibit 4.

The above three totals are then added together to arrive at a total volume for the entire parcel.

TOTAL GROSS VALUE OF LOGGED AND CRUISED VOLUME: \$372,338

AVERAGE GROSS INCOME -- \$372,338 ÷ 50 YEARS = \$7,447/YEAR

III. CONCLUSION

The analysis presented shows conclusively that this property will not support a merchantable stand of timber, of sufficient production capability, to meet or exceed the Marginal Lands Income test:

1) Total gross income for 1983 was based on the volume of rotation aged merchantable timber which was logged 14 years ago, and adding the remaining standing merchantable timber (most of which is currently 55 to 70 years old) together. From these figures it can be seen that the gross income for the entire 387.652 acre site would have been \$372,338 in 1983. The average annual gross income would have been \$7,447/year. Because \$7,447 is less than \$10,000/year, the property meets the following statutory test for Marginal Lands: ORS 197.247 (1)(a) "The proposed marginal land was not managed during three of the five calendar years preceding January 1, 1983, as part of a ... forest operation capable of producing an average, over the growth cycle, of \$10,000 in annual gross income."

In summary, from the data collected on the merchantable volume growing on the above described parcel, this property is ill suited to the production of merchantable timber and use as land for forestry purposes. It is my opinion that this parcel should be classified as marginal land.

Sincerely,



**TIMBER CRUISE
DAHLEN PROPERTY**

Prepared
for
Karen Dahlen

Prepared by
Marc E. Setchko
Consulting Forester
March 25, 2005

EXHIBIT 3

LOG PRICES
Domestically Processed Logs
(Delivered to a mill; "Pond Value")

(1st QUARTER PRICES, GRANTS PASS UNIT)

1983

Ponderosa Pine

Peeler		\$ 575
1S		\$ 495
SM		\$ 300
2S		\$ 400
3S		\$ 280
4S		\$ 250
5S	★ ★	\$ 180
6S	★ ★	\$ 150
CR		\$ 260
Utility		\$ 80

LOG PRICES - 3rd Quarter 1983

WEST OREGON, SANTIAM, LANE, FOREST GROVE, TILLAMOOK AND ASTORIA UNITS

Douglas-Fir

#1P		\$505
#2P		425
#3P		340
SM		285
#2S		255
#3S	★ ★	215
#4S	★ ★	200
SC		140
Utility		75
CR		240

EXHIBIT 4

Hemlock

P		\$375
SM		260
#2S		220
#3S		190
#4S		175
Utility		65
CR		190

Spruce

SM		\$255
#2S		230
#3S		180

HERSHNER HUNTER
LLP

May 24, 2005

HAND DELIVERED

Lane County Planning Commission
ATTN; Jerry Kendall
125 E. 8th Avenue
Eugene, OR 97401

Re: PA 04-6092 (Dahlen)
Our File No. 22186.30005

Dear Commissioners:

We represent Karen Dahlen, the applicant, regarding PA 04-6092. This letter provides the Lane County Planning Commission, and the record of this proceeding, with the applicant's rebuttal of additional testimony provided by Goal One Coalition in its letter to the Commission, dated April 21, 2005.

Goal One Coalition argues the following:

The applicant's demonstration of compliance with the forest income test, by the report of Marc Setchko, dated March 27, 2005, is incomplete because it assumes a 50-year rotation, it assumes 1983 log prices, fails to consider Ponderosa Pine and assumes actual stocking levels rather than potential stocking levels.

Mr. Setchko is the applicant's professional forestry consultant and produced the March 27, 2005, as he has produced all of his reports in the record, consistent with the 1997 Lane County interpretation of ORS 197.247. The interpretation contains objective criteria developed by Lane County for use in the income calculations required by the statute. The use of that objective criteria by Lane County is authorized by ORS 197.247(5). Fifty-year rotations are the interpretation's adopted standard as is the use of 1983 log prices. The applicant has responded to this argument regarding the rotation standard and the use of 1983 log prices throughout this proceeding and incorporates herein all previous responses thereto.

The interpretation also directs that applicants "assume the stand was, in 1983, fully mature and ready for harvest. Goal One Coalition argues that the interpretation means to assume

0cc #10-3/A.

"potential stocking levels." Its argument is not consistent with the language of the interpretation. In fact, Mr. Setchko provided the actual harvest (at 1990 maturity levels) and the actual maturity level of the remaining timber on the property in his cruise and then applied 1983 prices to that volume. That volume is obviously higher than it would have been in 1983 and produces an even higher income calculation than if Mr. Setchko had attempted to determine what the actual volume would have been in 1983. Even with the higher volumes, the resultant calculations produced an annual income level below the required \$10,000 threshold of the statute.

The applicant and Mr. Setchko have responded to the Ponderosa Pine argument in earlier submittals to the record in response to earlier Goal One Coalition arguments.

The applicant is required to produce income information from the third party that grazed of cattle on the subject property during the period 1978-1983.

The applicant continues to rely upon the 1997 interpretation which provides that all operations on contiguous property must be analyzed in the income calculations. Goal One Coalition again rejects the direction of the interpretation and argues for a different approach to the calculations. Goal One Coalition's argument would require an analysis of farm and forestry operations, wherever located by whomever, rather than an analysis of the income-producing capability of the subject property. That approach is inconsistent with the stated purpose of the tests--determining whether the subject property was making a significant contribution to the forest and farm economy of Oregon during the subject period.

All Moshofsky-owned property and mills existing in the world during the 1978-1983 test period must be included in the application of the income test.

The applicant responded to this argument in our correspondence to the Commission, dated April 18, 2005.

Conclusion

Throughout the record of this proceeding, and with the inclusion therein of the information and argument contained herein, the applicant has demonstrated that the designation of subject property as Marginal Land complies with ORS 197.247 and all other applicable criteria. Throughout the proceeding Goal One Coalition has presented issues and arguments that are without legal foundation, are not supported by substantial evidence and are without

Lane County Planning Commission
May 24, 2005
Page 3

merit. Therefore, the Commission should recommend to the Lane County Board of Commissioners that the application be approved.

Best regards,



STEVE CORNACCHIA

PSC:ss

Cc: Karen Dahlen

HERSHNER HUNTER^{LLP}

STEVE CORNACCHIA
scornacchia@hershnerhunter.com

July 25, 2005

HAND DELIVERED

Jerry Kendall
Lane County Land Management Division
Public Service Building
125 E. 8th Avenue
Eugene, OR 97401

Re: Karen Dahlen (PA 04-6092)
Our File No. 22186.30005

Dear Jerry:

Enclosed are documents and materials that are delivered to you with our request that you include the same in the record of PA 04-6092. The enclosures are provided to the record to support the Dahlen application as evidence addressing applicable criteria, issues raised during the Lane County Planning Commission proceedings and issues raised by opponents of the application. We will be providing you with draft findings of fact supporting a county approval of the application that will incorporate the current record and the enclosures provided herein.

The following documents and materials, with a brief explanation of each and its purpose, are enclosed:

1. **Pages ii and xi of the 1987 U.S. Department of Agriculture Soil Conservation Service (SCS) Soil Survey of Lane County Area, Oregon (1987 Soil Survey).** Page ii provides evidence that the publication is the product of fieldwork completed in 1980 and contains soil names and descriptions approved by the SCS in 1981. Page xi is the Foreword of the publication and provides evidence that the SCS intended the publication to be used for land use planning programs in Lane County. Both pages provide evidence that the publication contains the soil capability classes in the Agricultural Capability Class Classification System in use by the United States Department of Agriculture

Dec 11 - 125 pp.

Jerry Kendall
July 25, 2005
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Conservation Service on October 15, 1983. (as required in ORS 197.247(1)(b)(C)) The application incorporates the soil capability classifications of the 1987 Soil Survey in determining the classifications of the subject property's soils and to address the criteria of ORS 197.247.

In addition, we request that Lane County incorporate into the record, by reference, the entire 1987 Soil Survey.

2. Forward of the 1987 Soil Survey currently posted on the NRCS web site. The Forward on the website is a reproduction of the Foreword of the published 1987 Soil Survey that also includes the boxed statement: "This is a scanned version of the text of the original Soil Survey report of Lane County Area, Oregon, issued September, 1987. Original tables and maps were deleted. There may be references in the text that refer to a table that is not in this document." Reviewing the text following that statement on the Foreword reveals that it is a mirror image of the text of the published 1987 Soil Survey. A review of the text of the 1987 Soil Survey on the website reveals that the text of each soil map unit is a mirror image of the text of the published 1987 Soil Survey. That text reveals that the NRCS has not modified or changed the soil capability classifications of any soils listed in the published 1987 Soil Survey.

3. Lane County Agricultural Lands Working Paper of the Lane Rural Comprehensive Plan ("Working Paper") published in November 1981, and its 1983 Addendum. The Working Paper, and its 1983 Addendum, is listed by ordinance as supportive technical information used in preparation of the Lane Rural Comprehensive Plan and serves as a part of the factual basis of that comprehensive plan. The two documents include a 1980 SCS publication that lists soil capability classifications for soils in Lane County. The Working Paper and its Addendum also contain myriad references to the SCS Land Capability System and SCS data. They demonstrate that the soil capability classifications within the SCS Land Capability System were being used in 1981, and that that use included the county's use of it (and the SCS's use in providing the information to the public) and its classifications in 1981 and thereafter. The soil capability classifications in use by the SCS and the public in 1981 are mirror images of the soil capability classifications contained in the 1987 Soil Survey.

4. Page 1 of 9 of the Lane County Soil Ratings for Forestry and Agriculture (1997 Soil Survey). That page includes a statement that the Natural Resources Conservation Service (NRCS) participated in the creation of the 1997 Soil Survey. That statement provides evidence that the survey contains NRCS data regarding forest capability. (as required by ORS 197.247) The application incorporates some of the cubic feet per acre per year designations contained in the 1997 Soil Survey for particular soils of the subject property.

Jerry Kendall
July 25, 2005
Page 3

5. **Office of State Forester (Oregon Department of Forestry) February 8, 1990 Memorandum (General File 7-1-1) including attached Lane County Forest Soils Ratings.** The memorandum provides evidence that the Oregon Department of Forestry has published forest soil ratings for Lane County and that those ratings are based upon SCS data. The applicant's profession forestry consultant, Marc Setchko used ratings published in the memorandum in his calculations regarding forest productivity and the memorandum provides evidence that the ratings he used were based upon SCS data.

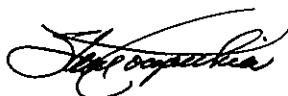
6. **LUBA Decision No. 2005-029, *James Just v. Land County (Carver)*.** The LUBA decision contains LUBA's resolution of a variety of Marginal Land issues raised in the Carver application, including the use of the Lane County 1997 Supplement to Marginal Lands Information Sheet ("Lane County Supplement") in Marginal Land applications. In the Carver decision LUBA affirmed the county's use of 1983 log prices and 50-year rotations, as provided in the Lane County Supplement, for determining forest income as required by ORS 197.247. The decision is provided to assist the Lane County Board of Commissioners in their deliberation on the subject application.

7. **Affidavit of Art Moshofsky.** Mr. Moshofsky provides evidence that the subject property was not managed as a part of any other business or forest operation that he was involved with during the applicable period and that he owned no other property adjacent to, contiguous with or in the vicinity of the subject property.

8. **Affidavit of Mark Minty.** Mr. Minty provides evidence affirming information contained in an earlier affidavit of Mr. Moshofsky and states that C&M Livestock, Inc., did not own or manage any property adjacent to, contiguous with or in the vicinity of the subject property while it grazed cattle on the subject property.

Please place this correspondence and its enclosures into the record of PA 04-6092. If you have any questions regarding this matter please contact me.

Best regards,



STEVE CORNACCHIA

PSC:ss

Enclosures

Cc: Karen Dahlen (with enclosures)

APPENDIX A

This soil survey is a publication of the National Cooperative Soil Survey, a joint effort of the United States Department of Agriculture and other federal agencies, state agencies including the Agricultural Experiment Stations, and local agencies. The Soil Conservation Service has leadership for the federal part of the National Cooperative Soil Survey. In line with Department of Agriculture policies, benefits of this program are available to all, regardless of race, color, national origin, sex, religion, marital status, or age.

Major fieldwork for this soil survey was completed in 1980. Soil names and descriptions were approved in 1981. Unless otherwise indicated, statements in this publication refer to conditions in the survey area in 1981. This survey was made cooperatively by the Soil Conservation Service, the Bureau of Land Management, the Oregon Agricultural Experiment Station, and Lane County. It is part of the technical assistance furnished to the North Lane, Siuslaw, and Upper Willamette Soil and Water Conservation Districts. Financial assistance was provided by Willamette Industries.

Soil maps in this survey may be copied without permission. Enlargement of these maps, however, could cause misunderstanding of the detail of mapping. If enlarged, maps do not show the small areas of contrasting soils that could have been shown at a larger scale.

Cover: Typical area of Yellowstone soils and Rock outcrop in foreground and Keel and Hummington soils in center. Three Sisters Mountains in background mark the western boundary of Lane County.

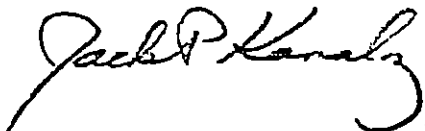
Foreword

This soil survey contains information that can be used in land-planning programs in Lane County Area, Oregon. It contains predictions of soil behavior for selected land uses. The survey also highlights limitations and hazards inherent in the soil, improvements needed to overcome the limitations, and the impact of selected land uses on the environment.

This soil survey is designed for many different users. Farmers, ranchers, foresters, and agronomists can use it to evaluate the potential of the soil and the management needed for maximum food and fiber production. Planners, community officials, engineers, developers, builders, and home buyers can use the survey to plan land use, select sites for construction, and identify special practices needed to insure proper performance. Conservationists, teachers, students, and specialists in recreation, wildlife management, waste disposal, and pollution control can use the survey to help them understand, protect, and enhance the environment.

Great differences in soil properties can occur within short distances. Some soils are seasonally wet or subject to flooding. Some are shallow to bedrock. Some are too unstable to be used as a foundation for buildings or roads. Clayey or wet soils are poorly suited to use as septic tank absorption fields. A high water table makes a soil poorly suited to basements or underground installations.

These and many other soil properties that affect land use are described in this soil survey. Broad areas of soils are shown on the general soil map. The location of each soil is shown on the detailed soil maps. Each soil in the survey area is described. Information on specific uses is given for each soil. Help in using this publication and additional information are available at the local office of the Soil Conservation Service or the Cooperative Extension Service.



Jack P. Kanalz
State Conservationist
Soil Conservation Service

APPENDIX D

This is a scanned version of the text of the original Soil Survey report of Lane County Area, Oregon, issued September, 1987. Original tables and maps were deleted. There may be references in the text that refer to a table that is not in this document.

Updated tables were generated from the NRCS National Soil Information System (NASIS). The soil map data has been digitized and may include some updated information. These are available from <http://soildatamart.nrcs.usda.gov>.

Please contact the State Soil Scientist, Natural Resources Conservation Service (formerly Soil Conservation Service) for additional information.

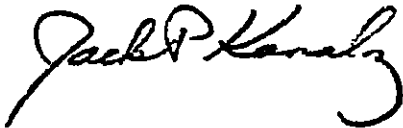
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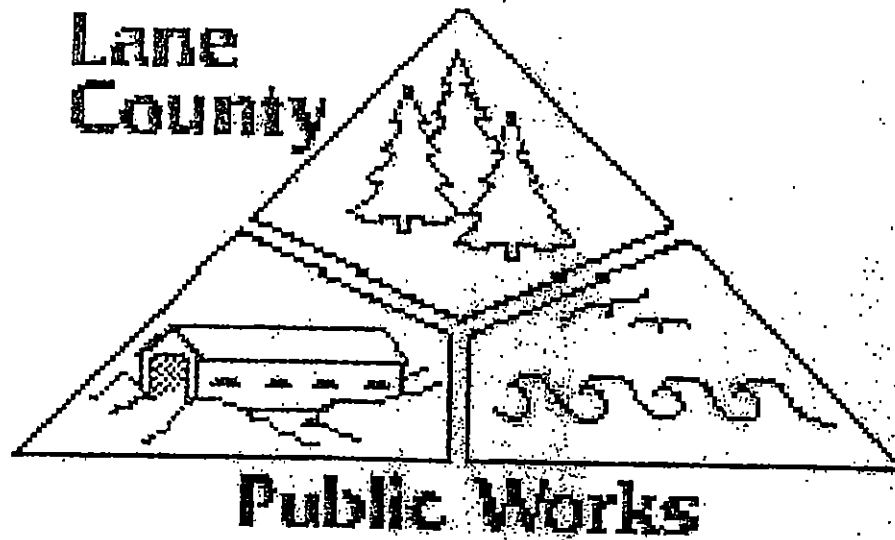
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Jack P. Kanalz
State Conservationist
Soil Conservation Service



**LANE COUNTY
RURAL COMPREHENSIVE PLAN**

**WORKING PAPER
Agricultural Lands (Nov. 1981)**

WORKING PAPER - AGRICULTURAL LANDS

I. INTRODUCTION

A. Purpose of Working Paper

The purpose of the Agricultural Land working paper is to address Statewide Planning Goal No. 3 (Agricultural Lands). It discusses: 1) the need to preserve agricultural lands; 2) Statewide Goal No. 3 - what it says and what is required for compliance with the Goal; 3) natural characteristics of agriculture in Lane County; 4) certain economic and social characteristics of agriculture in Lane County; 5) definition of commercial farm units; and 6) the County's role in creating an acceptable program for goal compliance, including suggested Policies as a starting point for Policy development.

B. Abstract

1. Statewide Planning Goal No. 3 requires the preservation and maintenance of agricultural lands. Local governments must inventory agricultural lands, employ a standard of minimum lot sizes that are appropriate for the continuation of the existing commercial enterprise within the area, and apply exclusive farm-use zoning to agricultural lands.
2. Upon review, LCDC found that Lane County's Plan and zoning, as it applied to agricultural lands, did not meet requirements of Goal No. 3.
3. Lane County's variety of natural physical characteristics is reflected in a diverse agricultural industry. Conditions range from intensely farmed lands to less intensely used pastureland and woodlots. Physical characteristics include topographic, climatic, and soils, which are examined in this working paper.
4. The US Soil Conservation Service's Land Capability Classification System and Important Farmland Inventory are presented as a basis to agricultural land designations.
5. Economic and social characteristics of Lane County agriculture, such as: farm composition, crops, farm sales and income, production trends, marketing and employment are discussed as additional factors affecting farming in the County.
6. Existing commercial farm enterprises are identified and discussed according to Assessment and Taxation Agricultural Land Rent Zones.

C. Need to Preserve Agricultural Lands

Besides acknowledging that agricultural land must be preserved in order to comply with Goal No. 3, there is the legislative agricultural land

use policy adopted by the 1973 Legislative Assembly (see text of policy in Appendix A). In summary, the policy states the public purposes for preserving agricultural land are:

- Maintenance of open space constitutes an important physical, social, aesthetic and economic asset.
- The agricultural land base is in limited supply and must be maintained to support the agricultural economy and to feed the people of the state and nation. Farming is often an exporter of goods and therefore adds to the basic income of the state and local areas. Farming also supports other businesses such as food processors, warehouses, farm implement dealers, feed stores, hardware stores, grocery stores, etc.
- Urban development into rural areas creates unnecessary public costs, conflicts between farm and non-farm activities and the loss of open space and natural beauty. Farm lands retain natural systems and natural processes such as wetlands, watersheds, aquifer recharge areas, floodplains, and wildlife habitats, all of which benefit urban and rural areas alike. Urban sprawl costs public money because of less efficient use of public facilities. Public costs can be controlled by controlling the timing, rate, or location of urban development. Farmers tend to irritate non-farm residents, and non-farm residents tend to irritate farmers, because of normal practices and lifestyle conducted by both.
- Application of exclusive farm use zoning limits alternatives to the use of land, but this is offset through such practices as tax deferral programs (reduction in taxes), exemption from certain special district tax assessments, and prohibition against restrictive local ordinances of accepted farm practices.

II. STATEWIDE PLANNING GOAL 3*

Statewide Planning Goal 3 reads as follows:

Goal: To preserve and maintain agricultural lands.

Agriculture lands shall be preserved and maintained for farm use, consistent with existing and future needs for agricultural products, forest and open space. These lands shall be inventoried and preserved by adopting exclusive farm use zones pursuant to ORS Chapter 215. Such minimum lot sizes as are utilized for any farm use zones shall be appropriate for the continuation of the existing commercial agricultural enterprise with the area. Conversion of rural agricultural land to urbanizable land shall be based upon consideration of the following factors: (1) environmental, energy, social and economic consequences; (2) demonstrated need consistent with LCDC goals; (3) unavailability of

* The following discussion is taken from the published Goal No. 3, LCDC Policy Papers on Goal No. 3, Land Use Board of Appeals and other Court decisions, and information from Oregon State University Extension Service.

an alternative suitable location for the requested use; (4) compatibility of the proposed use with related agricultural land; and (5) the retention of Class I, II, III and IV soils in farm use. A governing body proposing to convert rural agricultural land to urbanizable land shall follow the procedures and requirements set forth in the Land Use Planning goal (Goal 2) for goal exceptions.

(See Appendix B for Goal definition of agricultural land and farm use)

Goal requirements are as follows:

- 1) Inventory of agricultural lands including:
 - a) Class I-IV soils, and
 - b) "Other lands" that are: i) suitable for farm use taking into consideration certain factors (see Appendix B); and ii) adjacent or nearby lands necessary to permit farming practices in the area. This category must consider soil classes outside of classes I-IV which are suitable for grazing, and lands needed for the conduct of accepted farming practices.
- 2) Provide for the preservation of agricultural lands exclusive of those lands already committed or developed with non-farm uses. The required method of preservation of inventoried agricultural land is the application of a farm use zone that qualifies under ORS 215 (Exclusive Farm Use Zone-EFU).
- 3) Employ a standard of minimum lot sizes that are "appropriate for the continuation of the existing commercial agricultural enterprise within the area". This standard must be applied when approving the creation of new parcels and dwellings, and development of preexisting lots (lots created prior to the zoning of land EFU.)

The standard can be applied in various ways:

- a) One fixed acreage size.
- b) Different fixed sizes for different types of farm activities (crops or location).
- c) No minimum lot size, but lot sizes determined on a case-by-case basis in accordance with performance standards.

In determining the minimum lot sizes it is necessary to consider: types of crops grown in the area, yields, acres in production, existing processing and marketing practices, type of farms (practices and crops), and amount and type of land needed (includes the entire farm unit, not just the individual parcel).

A minimum lot size determination is necessary inasmuch as the EFU zone requires that: 1) divisions of land that create lots smaller than the minimum farm standard are considered non-farm parcels; 2) dwellings are allowed outright only on farm parcels; dwellings on non-farm parcels are subject to review pursuant to specific criteria (ORS 215.213(3)); and 3)

creation of non-farm parcels are subject to the same review. New dwellings on pre-existing lots cannot be allowed outright, subject to Senate Bill 419.

Commercial farm parcels are not specifically defined, however, a recent Land Use Board of Appeals decision found that the "farm use" definition from the statute (ORS 215.203) is not adequate as the standard for commercial farm parcels (LUBA No. 81-21, January 13, 1981).

In explaining the concept of a commercial agricultural unit, the LCDC Goal 3 policy paper states that a commercial agricultural operation is one which will: 1) contribute in a substantial way to the area's existing agricultural economy; and 2) help maintain agricultural processors and established farm markets. In other words, the commercial agricultural enterprise of an area not only includes the crops grown but also includes the marketing system from processing to selling. Furthermore, the marketing system can only exist on volumes of produce. There is a presumption that commercial agricultural enterprises may be supported by less than full-time farmers, but not maintained by those operators. Prime consideration in determining a lot size appropriate for the continuation of the existing commercial agricultural enterprise in an area is the amount and type of land needed for a given farm unit. It is LCDC's policy that acreage homesites, even though they relate to farm use in a peripheral or secondary sense, are not to be considered commercial agriculture for the purpose of determining minimum lot sizes.

In summary, in order to meet compliance with Goal No. 3, a county should:

- 1) Inventory agricultural lands and commercial agriculture enterprises in the county by determining:
 - a) The types of agriculture conducted.
 - b) The location of different types of agriculture in the county.
- 2) Apply EFU zone to agricultural land.
- 3) Establish a minimum lot size(s) for commercial agricultural enterprise(s) for each type of agriculture. For example, if it can be determined that the substantial volume of produce is produced by farm units of a given size or by farms with a given sale volume, and that a typical farm is so many acres, then the typical farm acreage would be considered the minimum lot size for the purpose of establishing a farm unit or non-farm unit.

A jurisdiction may choose not to pre-determine a minimum lot size(s) for farm units, but instead review each land use action on a case-by-case basis. In this case the same information would have to be generated to meet the requirements of Goal No. 3.

In its review of materials submitted in September, 1980, for acknowledgement of the County Comprehensive Plan, the Oregon Land Conservation and Development Commission concluded that Lane County did not comply with Statewide Goal 3, based on the following items:

- The agricultural land inventory was deficient as it did not assess "other lands suitable for farm use" and "adjacent or nearby lands."
- None of the County's farm zones are qualified exclusive farm use zones pursuant to ORS Chapter 215.
- The County failed to designate all agricultural lands for farm use.
- The County's farm zones did not meet the Goal 3 standard on minimum lot sizes.
- None of the zones ensures that farm-related dwellings will be only on lots appropriate for commercial agriculture. Dwellings must be sited as either farm or nonfarm dwellings subject to the appropriate review standards.

To address the above issues, the LCDC adopted the following requirements:

In order to comply with Goal 3, Lane County must:

- Inventory all agricultural lands as defined by Goal 3.
- Designate all agricultural lands for farm use and zone Exclusive Farm Use pursuant to ORS Chapter 215. Any agricultural lands designated or zoned for nonresource uses requires a plan amendment and Exception to Goal 3.
- Amend the EFU-20, A-1, and A-2 zones to be qualified exclusive farm use zones pursuant to ORS Chapter 215. This requires that:
 - a. Only the permitted and conditional uses authorized by ORS 215.203 and 215.213 be allowed;
 - b. All divisions of land be reviewed pursuant to ORS 215.263; and
 - c. The A-2 zone review the creation of nonfarm lots against the standards in ORS 215.213(3).
- Provide justification that any minimum lot size used is "appropriate for the continuation of the existing commercial agricultural enterprise." If the existing 20-acre lot size cannot be justified then the County must either establish a new minimum lot size consistent with the size of existing commercial farms or enact a method of review that ensures that all farm use land divisions will meet the Goal's standard as set forth in 5 below. (Based on the 1978 Census of Agriculture data, it is doubtful the 20-acre lot size can be justified.)
- Amend the A-1 and A-2 zones to require that new farm parcels and dwellings on existing parcels will be "appropriate for the continuation of the existing commercial agricultural enterprise." Each zone must be amended to:

- a. Include appropriate factors to determine what constitutes "commercial" agriculture;
- b. Require that only commercial farm units are used to determine what are the appropriate lot sizes;
- c. Define the area to be considered when making these determinations; and
- d. Remove all provisions that exempt pre-existing lots from review.

Agricultural/Forestry Goal Interrelationship

In an inventory of agricultural lands and forest lands there will be many instances where land will meet Goal definitions for both categories. According to Oregon Land Conservation and Development Commission's policy, farm and forestry uses are compatible and either designation may be made without taking an exception to the other Goal. The factors used to select a designation need to be documented in the Plan. The policies within the Plan will support one designation over another depending on the situation.

The County should consider the following items in addressing overlapping lands:

- a. Identify Agricultural and Forest Lands Goal definitions and inventories.
- b. Segregate overlapping lands from single resource lands.
- c. Apply evaluations of local circumstances and Goal factors to overlapping lands to determine appropriate designation.
- d. Designate overlapping lands as agricultural, forest or agricultural/forest through Plan policies and diagrams.
- e. Protect designated lands for appropriate uses through the zoning ordinance and other implementation measures.

It is intended that agricultural and forest practices be able to coexist without mutual interference while conserving those resource lands.

III. FACTORS AFFECTING AGRICULTURE IN LANE COUNTY

A. Natural Characteristics*

1. Physical Setting

Within Lane County, agricultural land is generally located at the

* The following discussion is based on "An Agricultural Atlas of Lane County," "Resource Data for Agricultural Development in Linn, Lane and Benton Counties," and published and unpublished information from the US Soil Conservation Service.

head of the Willamette Valley plus narrow irregular strips of land that extend up the tributaries of the Willamette River, scattered stream bottomlands, and flat-bottomed coastal estuaries. The Willamette Valley floor, with an average elevation of 400 feet, is fairly flat and slopes downward gradually toward the north. The valley floor consists mainly of alluvial soils, with slightly higher terraces also of alluvial origin.

The eastern part of the County is a heavily forested high lava plateau with an elevation of 5,000 to 6,000 feet. Peaks of the Cascade Range rise to 10,000 feet and more at the extreme eastern edge of the County. The mostly timbered plateau slopes downward toward the west, ending at the edge of the Willamette Valley where slopes drop abruptly to the valley floor from heights of 2,000 feet and more.

West of the Willamette Valley is the Coast Range with an average elevation of about 1,000 feet; some peaks reach an elevation of 2,500 feet. The mostly timbered Coast Range is cut by the highly meandering course of the Suislaw River, along which some agricultural activity is conducted.

The Coastal area consists of the estuary of the Suislaw River, extensive sand dune areas, and areas where steep slopes of the Coast Range abruptly meet the Pacific Ocean. Consequently, little agricultural activity exists.

2. Climate

The climate of Lane County is dominated by moist, mild air from the Pacific Ocean. Winters are cloudy and wet, with mild temperatures. In January, the average monthly temperature decrease upslope as follows: Coast 45°F; Coast Range Valleys 41°F; Willamette Valley 39°F; and Cascades (5,000') 28° F. Eighty percent of the annual precipitation comes in the winter months from October through March, also decreasing inland but increasing upslope. The Coast receives about 80 inches of rainfall, the Coast Range over 100 inches, the Valley about 40 inches, and up to 80 inches in the high Cascades. Gentle rains extending over many days are characteristic.

Although the air masses are generally from the northwest in the summer, they are relatively moist but stable. Along the coast the weather is cool and foggy. Inland the temperatures increase and rainfall is limited to an occasional thunder storm in the higher parts of the Cascades. The average monthly temperatures in July varies as follows: Coast 61°F; Coast Range Valleys 64°F; Willamette Valley 66°F; and Cascades (5,000') 59°F.

Relatively constant, mild temperatures in the Upper Willamette Valley produce a long growing season. However, when air does flow into the Valley from the east, dry, hot weather develops in the summer causing extreme fire hazard, while in the winter this situation causes clear, sunny days and cool, frosty nights. The average period for non-freezing temperatures is April 9 to October 31. The average growing period between killing frosts is

approximately 210 days.

The Valley, partially in the rain shadow of the Coast Range, has the least precipitation, the mildest winters, and the longest, driest summers. Growing season precipitation totals about six inches and during the summer months (July, August, September) averages less than one inch per month. Irrigation is necessary to obtain maximum production for many crops. Temperature, growing season, amount of sunshine and character of soils are all favorable for the growth of a variety of crops.

3. Agricultural Land Base

Knowledge of soil types is basic to understanding and defining agricultural lands. As Goal 3 defines agricultural land in terms of the Land Capability Classification System of the US Soil Conservation Service (SCS), a brief discussion of the system is in order.

SCS has identified approximately 210 mapping units or soil types within the County as is indicated in Appendix C. Those soil types are grouped into eight classes; the higher the class number the more severe the limitations for farm uses. The classification system is based on soil characteristics such as permeability, water-holding capacity, depth, inherent fertility, texture, structure, wetness, acidity, flooding, slope, and climatic conditions as they influence use, management and productivity of the land.

Subclasses designate types of limitations:

e = susceptible to wind or water erosion;

w = wetness or prolonged frequent inundation from overflow;

s = soil problem (depth, stoniness, texture); and

c = climatic limitation.

The classification can be placed in two divisions:

- 1) Class I through Class IV are well-suited for cultivation.
- 2) Class VI through Class VIII are best suited for range, forestry, and wildlife.

The classes are defined as follows:

Class I soils have few or no limitations or hazards. They may be used safely for cultivated crops, pasture, range, woodland or wildlife.

Class II soils have few limitations or hazards. Simple conservation practices are needed when cultivated. They are suited to cultivated crops, pasture, range, woodland or wildlife.

Class III soils have more limitations and hazards than those in Class II. They require more difficult or complex conservation practices when cultivated. They are suited to cultivated crops, pasture, range, woodland or wildlife.

Class IV soils have greater limitations and hazards than Class III. ~~Still~~ more difficult or complex measures are needed when cultivated. They are suited to cultivated crops, pasture, range, woodland or wildlife.

Class V soils are not found in Lane County.

Class VI soils have severe limitations or hazards that make them generally unsuited for cultivation. They are suited largely to pasture, range, woodland or wildlife.

Class VII soils have very severe limitations of hazards that make them generally unsuited for cultivation. They are suited to grazing, woodland or wildlife.

Class VIII soils and landforms have limitations and hazards that prevent their use for cultivated crops, pasture, range or woodland. They may be used for recreation, wildlife or water supply.

Completion of the Soil Survey of Lane County publication by SCS is some years away. However, the necessary field work has been completed along with a preliminary draft of the text and a general soil map by associations. Lacking the SCS Soil Survey, cartographers in the County Planning Division under the direction of the Lane County Soil Scientist in close cooperation with the local SCS office, produced soil maps at a scale of 1" = 3000'. The resulting maps, while not at the degree of accuracy as an SCS-produced County survey would be, represent the best County-wide information available and will remain so until publication of the Lane County Soil Survey by SCS. These maps are on file in the Lane County Department of Environmental Management offices in Eugene.

While the Land Capability Classification System has certain advantages, it does have some drawbacks. The primary one being the classes relate management suitability and not soil productivity. As the Lane County Agricultural Advisory Committee recognized soil productivity as the most important factor that affected the agricultural value of land in Lane County, it was suggested that the SCS Important Farmlands Inventory supplement the classification system.

For the purpose of this report, three categories of farmland based on the Farmlands Inventory are depicted:

a. Prime Farmlands

Prime Farmlands are defined by the US Department of Agriculture as land that is best suited to producing food, feed, forage, fiber, and oilseed crops. It has the soil quality, growing season, and moisture supply needed to economically produce a

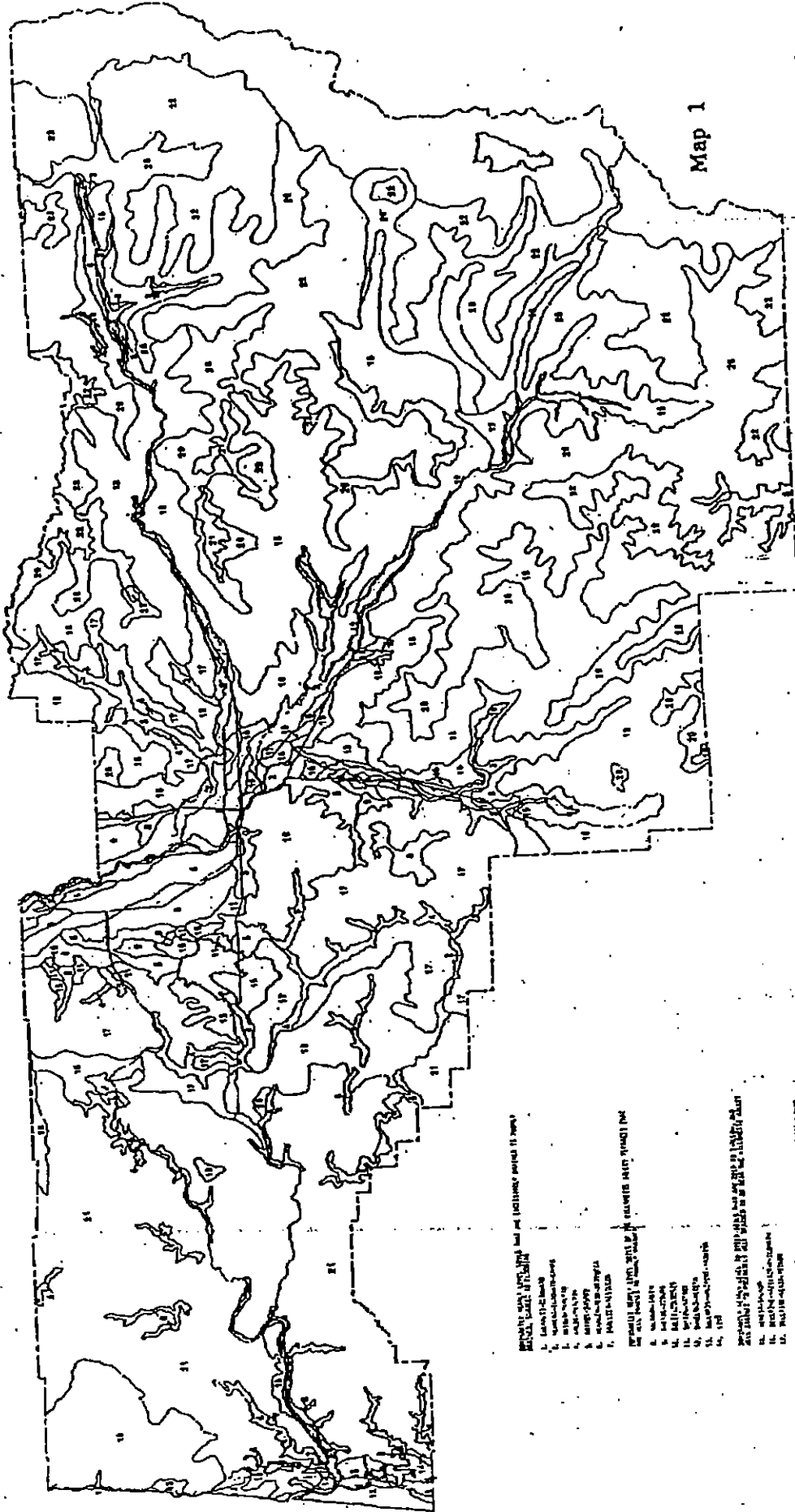
substantially high yield of crops when it is treated and managed using acceptable farming methods. Prime farmland produces the highest yields with minimal inputs of energy and economic resources, and farming it results in the least damage to the environment.

According to an unpublished SCS report, about 160,000 acres or less than six percent of Lane County meets the soil requirements for prime farmland. These lands are located mostly in the central portion of the County, in and adjacent to the Willamette Valley, mainly in Map Units 1, 2, 3, 8, 15 and 17 of the General Soil Map shown on Map I. Approximately 60,000 acres of this prime farmland is used for crops, 40,000 acres are in forest, nursery and Christmas tree production, and 15,200 acres are in urban areas. Crops grown on this land (mainly corn, snapbeans, wheat, peppermint and filberts) account for an estimated 50 percent of Lane County's total agricultural income for 1980. The loss of this prime farmland to other uses puts pressure on marginal lands, which are less suited for cultivation, and usually less productive.

Soil map units that make up prime farmland in Lane County are listed below. These map units are prime farmland except when the use is urban or built-up land, or fail to meet the criteria indicated by footnote:

Map Symbol	Map Unit 1/	Approx. Acres	Capability Class
80A	Abiqua silty clay loam, 0-3% slopes	5,210	I
81B	Abiqua silty clay loam, 3-5% slopes	1,230	IIe
480B, 635C	Bellpine silty clay loam, 3-12% slopes	15,850	IIIe
31A	Chapman loam	3,800	I
30A	Chehalis silty clay loam, occasional overflow	9,300	IIw
4A	Cloquato silt loam	5,170	IIw
270A 201A	Coburg silty clay loam	13,480	IIw
234A	Holcomb silty clay loam 2/	1,560	IIIw
385B	Jimbo silt loam, 0-3% slopes	2,550	I
550B	Jory silty clay loam, 2-12% slopes	4,560	IIe
351A	Linslaw loam 2/	5,700	IIIw
260A	Malabon silty clay loam	15,350	I
90A	McAlpin silty clay loam, 0-3% slopes	11,860	IIw
40A	McBee silty clay loam	5,200	IIw
420B, 425B	Nekia silty clay loam, 2-12% slopes	4,860	IIIe
10A	Newberg fine sandy loa	8,970	IIw
11A	Newberg loam	9,490	IIw
120A, 121A	Pengra silt loam, 1-4% slopes 2/	5,070	IIIw
290A	Salem gravelly silt loam	7,550	IIs
335B	Salkum silt loam, 2-6% slopes	5,060	IIe
330B	Salkum silty clay loam, 2-8% slopes	5,160	IIe
322A, 320A	Sifton gravelly loam 3/	650	IIIs
360A	Veneta loam, 0-7% slopes	11,930	IIe
361B	Veneta Variant silt loam, 0-7% slopes	1,320	IIe
490B	Willakenzie clay loam, 2-12% slopes	2,500	IIIe
203A	Woodburn silt loam, 0-3% slopes	215	IIw

GENERAL SOILS MAP



Map 1

LEGEND

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TAKEN FROM A PRELIMINARY SOIL
MAP FROM U. S. DEPT. OF AGRICULTURE
SOIL CONSERVATION SERVICE

- 1/ Urban and built-up is defined to be any contiguous unit of land 10 acres or more in size that is used for residences, industrial sites, commercial sites, construction sites, institutional sites, public administrative sites, railroad yards, small parks, cemeteries, airports, golf courses, sanitary landfills, sewage treatment plants, water control structures and spillways, shooting ranges, and so forth.
- 2/ Where drained sufficiently for cropland.
- 3/ Where there is a developed irrigation water supply that is dependable and of adequate quality.

b. Additional Farmland of Local Importance

This is land, in addition to prime farmland, that is of local importance for the production of food, feed, fiber, forage, and oilseed crops. This category includes those that are near prime farmland and that economically produce high yields of crops when treated and managed according to acceptable farming methods. Some may produce as high a yield for selected crops as prime farmland, if conditions are favorable.

<u>Map Symbol</u>	<u>Map Unit</u>	<u>Approx. Acres</u>	<u>Capa- bility Class</u>
<u>Willamette Valley Foothills</u>			
421C	Nekia silty clay loam, 12-20% slopes	15,520	IIIe
481C	Belpine silty clay loam, 12-20% slopes	58,520	IIIe
331C	Salkum silty clay loam, 8-16% slopes	2,160	IIIe
551C	Jory silty clay loam, 12-20% slopes	6,940	IIIe
491C	Willakenzie clay loam, 12-20% slopes	7,320	IIIe
<u>Coast Range Valleys, Terraces and Gently Sloping Foothills:</u>			
235B	Lint silt loam, 0-7% slopes	1,120	Ife
236C	Lint silt loam, 7-12% slopes	1,510	IIIe
560S	Honeygrove silty clay loam, 3-25% slopes	31,050	VIe
575S	Preacher loam, 0-25% slopes	10,950	VIe
395B	Meda loam, 2-12% slopes	10,650	IIIe
380B	Eilertsen silt loam, 0-7% slopes	1,590	Ife
150A	Nehalem silt loam	5,950	IIw
130A	Nekoma silt loam	7,170	IIIw
145A	Nestucca silt loam	5,830	IIw
<u>Large Wet Terraces (Ryegrass areas):</u>			
280A	Awbrig silty clay loam	9,890	IVw
60A	Bashaw clay	9,650	IVw
55A	Conser silty clay loam	4,200	IIIw
221A	Dayton silty loam, clay substratum	4,280	IVw
110A	Natroy silty clay loam	15,170	IVw
111A	Natroy silty clay	2,100	IVw
100A	Waldo silty clay loam	7,550	IIIw
50A	Wapato silty clay loam	2,320	IIIw

c. Other Class I through VII Soils*

This category of soils includes soil types identified as Classes I, II, III and IV not listed as prime farmland nor additional farmland of local importance, and Classes VI and VII if the USDA Soil Conservation Service, OR-1 Soil Interpretive Guide Forms (OR-1) indicate crop or pastureland potential. Classes VI and VII are included based on their suitability for pasture, range, and woodland, however, the inclusion of any soil within this category must be mitigated according to their actual current condition and suitability for farm uses. For example, if the soils are covered by vegetation such as timber or scrub growth; or irrigation is not feasible; or certain climatic conditions limit the duration of the growing season; or an excessive amount of energy would be needed to render the soils usable; then the soils would not be designated for agriculture.

Soil map units included in this category are listed below:

<u>Map Symbol</u>	<u>Map Unit</u>	<u>Capability Class</u>
1A, 2A	Camas gravelly sandy loam	IV w
20A	Brallier Muck, (drained)	IV w
135A	Willanch Fine Sandy Loam	III w
140A	Brenner Silty Clay Loam	III w
165B	Haffinger-Jimbo Complex, 0-5% slopes	VI s
166B	Jimbo-Haffinger Complex, 0-5% slopes	III s
204A	Heceta Fine Sand, 0-2% slopes	VI w
214B	Bandon Sandy Loam, 0-7% slopes	VI s
215C	Bandon Sandy Loam, 7-12% slopes	IV e
225A	Yaquina Loamy Fine Sand	IV w
230B	Bullards-Ferrelo Complex, 0-7% slope	III s
231C	Bullards-Ferrelo Complex, 7-12% slopes	III e
232D	Bullards-Ferrelo Complex, 12-30% slopes	IV e
237D	Lint Silt Loam, 12-20% slopes	IV e
250D	Neskowin Silt Loam, 12-20% slopes	IV e
251F	Neskowin Silt Loam, 20-40% slopes	VI e
256D, 255C	Hembre Silt Loam, 5-25% slopes	VI e
300A	Oxley Gravelly Silt Loam	III w
301A	Courtney Gravelly Silt Clay Loam	IV w
350A	Noti Loam	IV w
374C	Dixonville-Philomath-Hazelair Complex, 3-12% slopes	VI e
375S, 523C	Dixonville-Philomath-Hazelair Complex, 12-35% slopes	VI e
406D	Dixonville Silty Clay Loam, 12-30% slopes	IV e

* This category is not included in SCS report. It is included in this report for the purpose of a complete agricultural land inventory.

407B	Marcola Cobble Silty Clay Loam, 2-7% slopes	IV s
408C	Dixonville Silty Clay Loam, 3-12% slopes	III e
409F	Dixonville Silty Clay Loam, 30-50% slopes	VI e
414C, 415C	Philomath Cobble Silty Clay, 3-12% slopes	VI s
416C, 416S	Philomath Silty Clay, 3-12% slopes	VI e
422E, 422D, 427E	Nekia Silty Clay Loam, 20-30% slopes	IV e
430B	Steiver Loam, 3-12% slopes	III e
431C	Steiver Loam, 12-20% slopes	IV e
445B	Saturn Clay Loam	III s
446B	Briedwell Cobble Loam, 0-7% slopes	III e
469C	Ritner Cobble Silty Clay Loam, 2-12% slopes	IV s
474E, 470S, 405C	Ritner Cobble Silty Clay Loam, 12-30% slopes	VI s
475C, 365B	Panther Silty Clay Loam, 2-12% slopes	VI w
477C	Dupee Silt Loam, 3-20% slopes	III e
482E, 637E	Bellpine Silty Clay Loam, 20-30% slopes	IV e
492D	Willakenzie Clay Loam, 20-30% slopes	IV e
500C, 500S	Chehulpum Silt Loam, 3-12% slopes	VI e
501E, 501F	Chehulpum Silt Loam, 12-40% slopes	VI e
515S, 510B	Hullt Loam, 2-30% slopes	IV e
511C, 512D		
520B	Hazelair Silty Clay Loam, 2-7% slopes	III e
521C	Hazelair Silty Clay Loam, 7-20% slopes	IV e
552E	Jory Silty Clay Loam, 20-30% slopes	IV e
561K	Honeygrove Silty Clay Loam, 25-50% slopes	VI e

In summary, agricultural land is defined as all Class I through IV soils and all Class VI and VII except those areas subject to limiting factors. The final determination will be made at the time land use designations are assigned to the Comprehensive Plan Diagram.

4. Irrigation Capabilities

According to a 1972 Upper Willamette Resource Conservation and Development Project report, there are approximately 243,200 acres of land suitable for, or having a potential for, irrigation in Lane County. This figure is based on soil interpretations and when mapped it is evident that the best suited land for irrigation is located along the Main stem, Coast Fork and Middle Fork of the Willamette River, along the McKenzie River and the Mohawk River and Long Tom River.

The 1978 US Agriculture Census reports 32,002 acres of irrigated land, 26,424 acres of which is cropland. As noted in Table IV those irrigated lands primarily produce vegetables, peppermint, and hay.

The above noted 1972 report states that conditions present in the Valley are conducive for additional irrigation. The irrigation suitability map reveals that many more thousands of acres can be irrigated and thereby expand crop potentials.

B. Economic and Social Characteristics

I. Farm Composition

The 1978 US Census of Agriculture reported 1,709 farms* within Lane County, occupying 266,765 acres or 9.2 percent of the land area. There were 983 farms with sales of \$2,500 or more, occupying 226,380 acres resulting in an average farm size of 230 acres. Value of land and buildings of farms with sales of \$2,500 or more averages \$1,579 per acre; up from \$716 per acre in 1974. Following are various statistical data about Lane County farms.

TABLE I
Selected Agricultural Characteristics in Lane County,
All Farms, 1978-1969

Item	Unit	1978	1974	1969
Farms	No.	1,709	1,592	1,840
Land in Farms	Acres	226,765	264,123	279,587
Average Size	Acres	156	166	147
Harvested Cropland	Acres	89,102	85,060	79,403
Pasture Cropland	Acres	31,263	38,589	43,045
Woodland	Acres	68,302	67,609	81,465
Pastured Woodland	Acres	32,905	--	--
Pasture, other land	Acres	58,539	--	--
Pasture, all types	Acres	122,707	--	--
Irrigated Land	Acres	32,002	27,026	28,809
Operators				
Full owners	No.	1,310	1,214	1,383
Part owner	Acres	115,134	121,614	144,459
Reside on Farm	No.	289	303	356
Reside Off Farm	Acres	124,005	123,723	111,462
Organization	No.	1,459	1,258	1,526
Individual or Family	No.	161	166	176
Partnership	Acres	1,479	--	--
Corporation	No.	164,333	--	--
Value of Land and Buildings	Acres	194	--	--
Average per acre	Dollars	78,733	--	--
		34	--	--
		1,677	774	550

Source: 1978 and 1974 Census of Agriculture, US Department of Commerce, Bureau of Census.

* US Census of Agriculture defines a farm as any place from which \$1,000 or more of agricultural products were sold or normally would have been sold during the census year. This definition differs from that used in the 1959, 1964, and 1969 censuses. Land in farms is an operating unit and includes land owned and rented from others.

TABLE II
 Selected Agricultural Characteristics in Lane County,
 Farms with sales of \$2,500 or more, 1978-1969

<u>Item</u>	<u>Unit</u>	<u>1978</u>	<u>1974</u>	<u>1969</u>
Farms	No.	983	782	770
Land in Farms	Acres	226,380	213,730	200,831
Average Size	Acres	230	273	261
Harvested Cropland	Acres	82,745	77,509	70,704
Pasture Cropland	Acres	22,468	24,786	28,506
Woodland	Acres	50,228	46,791	56,497
Pastured Woodland	Acres	25,236	23,967	34,363
Pasture, other land	Acres	55,103	52,375	29,087
Pasture, all types	Acres	102,807	101,128	91,956
Irrigated Land	Acres	29,937	24,895	26,316
Operators				
Full owners	No.	670	498	449
	Acres	81,473	79,994	90,280
Part owners	No.	229	229	264
	Acres	118,972	116,707	100,019
Reside on farm	No.	824	586	641
Reside off farm	No.	111	94	65
Organization				
Individual or family	No.	803	696	662
	Acres	128,861	152,128	149,257
Partnership	No.	147	72	99
	Acres	75,250	49,893	46,565
Corporation	No.	32	14	7
	Acres	--	11,709	4,569
Value of Land and Buildings				
Average per acre	Dollars	1,579	716	530

Source: 1978 and 1974 Census of Agriculture, US Department of Commerce,
 Bureau of Census

TABLE IIa

Farms by Value of Sales and Occupation: 1978
Farms With Sales of \$20,000 or More

Occupation	Number	Total
Farming	209	262
Other than farming	53	
Farms With Sales of Less Than \$20,000		
Occupation	Number	Total
Farming	375	1,447
Other than farming	1,075	

Source: 1978 Census of Agriculture, US Department of Commerce, Bureau of Census

The number of farms with sales of \$2,500 or more increased 26 percent between 1974 and 1978. The total acreage for the same farms increased only 6 percent. The disparity in the percentage of increase is due to an exceptionally large increase in the number of farms in the size category 1 to 9 acres, and generally in the increase of farms less than 100 acres in size. This would also account for some of the increase in the per acre value of land and buildings from 1974 to 1978, as the unit value of land tends to increase the smaller tracts become. The smaller tracts have more value as home sites than for agricultural use.

In 1978, the type of farm organization for farms with sales of \$2,500 or more, consisted of the following percentages: individual or family - 82%; partnership - 15%; corporation and others - 3%. The relative percentages for acreage within each type are: 57%; 33%; and 10%, respectively. These statistics indicate that 82 percent of the owners (individual or family category) control only 57 percent of the land.

In 1978, 88 percent of the operators of farms with \$2,500 or more reported residing on the farm operated. Ninety percent of the operators of all farms reside on the farm. The percentage of farmers residing on the farm remained essentially unchanged between 1969 and 1978.

From the above listed statistics and other data from the 1978 Census of Agriculture, the character of farms and land in Lane County can be summarized as:

- 1) Farms consist of acreages ranging from 1-9 acres to several thousand acres;
- 2) 55 percent of the land is in farms with harvested cropland in farm units of 500 acres or more;
- 3) 87.5 percent of land reported is in farm units of 100 acres or more;
- 4) Farm operators generally reside on the farm;
- 5) The value of land and buildings more than doubled between 1974 and 1978; and
- 6) 48 percent of land in farms is cropland, 46 percent is pasture, 26 percent is woodland, 12 percent is irrigated and 4 percent is non-productive (house lot, wasteland, etc).

2. Crops

Major components of field seed crops include 20.2 million pounds of ryegrass, 2.3 million pounds of fescue, and 814,600 pounds of orchardgrass produced on 17,309 acres, 2,630 acres, and 1,277 acres, respectively. Within the vegetable category beans, beets, carrots, and sweet corn occupy 3,210 acres, 920 acres, 368 acres, and 3,690 acres, respectively. Within the grain category, wheat and oats account for more than 16,000 acres and over one million dollars of products sold. Harvested hay crops involve 27,800 acres. Vegetables are grown on over 8,000 acres with a market value of 4.9 million dollars. Within the livestock-poultry category, cattle and calves, poultry and poultry products, and dairy products amount to sales of over 16 million dollars. See Tables III and IV for details.

TABLE III
Livestock and Poultry Inventory and Sales
Lane County, 1978

	<u>Number</u>	<u>Sales</u> <u>\$1,000</u>	<u>Farms</u>
Cattle and calves			
Inventory	36,604		1,076
Sales	20,247	6,367	992
Dairy Products			
Sales		4,726	53
Hogs and pigs			
Inventory	2,830		143
Sales	4,955	253	129
Sheep and lambs			
Inventory	22,546		218
Sales	17,017		196
Goats			
Inventory	586		59
Sales	378	32	35

Horses and ponies			
Inventory	2,369		488
Sales	345	405	125
Broilers and other meat-type chickens			
Inventory	567,258		50
Sales	3,701,891		30

Source: 1978 Census of Agriculture, US Department of Commerce, Bureau of Census.

TABLE IV
Selected crops inventory
Lane County, 1978

Crop	Farms	Harvested	Quantity	Acres Irrigated
Corn				
Grain or seed (bushels)	3			
Silage (tons)	15		22,640	1,012
Wheat (bushels)	128	13,183	432,320	267
Oats (bushels)	87	3,659	117,325	
Barley (bushels)	25	801	37,520	
Hay, all (tons)	802	27,852	52,645	5,846
Field seed crops	45	22,925		1,673
Sugar beet seed	7	428	1,038,711	428
All vegetables	121	3,361		8,360
Orchards (fruits and nuts)	334	4,417		997
Apples (bushels)	119	182	338,909	
Peaches (bushels)	29	118	521,895	
Grapes (lbs)	38	53	20,859	
Filberts (lbs)	147	2,691	4,179,588	
Walnuts (lbs)	66	263	223,412	
Berries	72	312		305
Strawberries	28	186	1,323,672	184
Mint Oil	15	6,895	358,127	6,865
Nursery and Greenhouse Products	92	391		158

Source: 1978 Census of Agriculture, US Department of Commerce, Bureau of Census.

3. Value of agricultural products

Lane County's 1977 total value for farm marketing income, ninth in the products sold, and fourth in poultry and poultry products.

In 1977, the total value of agricultural products sold for all farms was \$41,923,000. Of this, \$2,500 or more was sold directly to individuals for \$1,000 or more for all farms; and \$702,600 was sold for \$250 or more for 2% and 1.7%.

respectively.

In 1978, there were 726 farms with sales of less than \$2,500. These farms amounted to 42 percent of all farms, but accounted for only 2% of the total value of agricultural products sold. The same percentage existed in 1974.

These figures indicate that a very small portion of agricultural products are sold directly for human consumption, and conversely, the vast majority of agricultural products are processed through the marketing system. Also, the greatest share of agricultural products are produced on farms with sales of \$2,500 or more.

TABLE V
Market Value of Agricultural Products Sold
Lane County, 1978

Market value of agricultural products sold	\$42,808,000
Crops	24,668,000
Grains	1,761,000
Field seeds, hay, forage, and silage	5,168,000
Vegetables, sweet corn, and melons	4,922,000
Fruits, nuts, and berries	2,891,000
Nursery and greenhouse products	4,720,000
Other crops	5,206,000
Livestock, poultry and their products	18,140,000
Poultry and poultry products	5,058,000
Dairy products	4,726,000
Cattle and calves	6,367,000
Hogs and pigs	253,000
Sheep, lambs, and wool	1,071,000
Other livestock and livestock products	666,000

Source: 1978 Census of Agriculture, US Department of Commerce, Bureau of Census.

TABLE VI
Estimated Gross Agricultural Income (\$1,000) 1976-1980
Lane County

<u>Item</u>	<u>1976</u>	<u>1980</u>	<u>Percentage Change</u>
All grains	\$ 3,475	\$ 4,945	+42
All hay crops	637	482	-24
Grass and legume seeds	3,080	4,533	+47
Field crops (ind. mints)	5,149	3,652	-29
Tree fruits and nuts	1,627	3,665	+125
Small fruits (berries)	536	713	+33
Vegetables	4,840	5,309	+10
Horticulture*	3,200	5,970	+87
Farm-Forest Products*	2,300	5,575	+142
Cattle and calves	3,673	7,110	+94
Hogs	270	304	+13
Sheep and lambs	677	1,155	+71
Dairy products	4,210	6,600	+57
All chickens	4,158	6,222	+50
Eggs-chicken	1,532	1,480	-3
Other livestock and poultry	508	756	+49
	<u>\$39,872</u>	<u>\$58,471</u>	<u>+47</u>

* In 1979, Christmas trees sales were included with Horticulture, prior to 1979 their income was included with Farm-Forest Products.

Source: Estimated Cash Receipts from Farm Marketing (Annual Reports), Lane County Agriculture, OSU Extension Service.

4. Production Trends

In addition to listing estimated acres, yields, and agricultural farm income the annual Estimated Cash Receipts from Farm Marketing reports briefly describe fluctuations of agricultural production and income. From the annual reports between 1976 and 1980, the following trends are apparent:

Grains - Acreage in wheat decreased, but yields and prices increased resulting in an increase of income.

Due to exceptional yield in wheat, higher acreage and higher prices, the income within the grains category reached a high value of \$6,896,000 in 1979. Production in 1980 dropped drastically from 1979 (from 90 bushels per acre to 70 bushels per acre) due to disease.

Oats - A doubling of acreage, increases in yields and prices resulted in a doubling of income.

Wheat, oats and barley are commonly rotated with other crops such as peppermint and vegetables.

Hay crops - An overall decrease in income was caused by decreased acreage and yields. Prices increased slightly except for corn silage which remained the same (\$20.00 per ton).

Seed production - Although the number of acres decreased slightly, increases of yields of tall fescue, annual and perennial ryegrasses and a slight increase in prices resulted in an overall increase of income. Income from seed production was lowest in 1978 (\$3,002,000) due to lower yields and lower prices in some cases.

Field crops - A substantial overall decrease in income from field crops is primarily a result of a drop in the price of peppermint as production was greater than demand. Income from peppermint reached a high of \$4,710,000 in 1977 when the price per unit (\$14.55 per pound) was the highest. The price dropped to \$9.00 per pound in 1980, with an estimated total value of \$2,970,000.

Tree fruits and nuts - A doubling of income for this category is largely due to nearly a doubling of yield and prices of filberts. Income from apples has risen, while income from cherries, prunes and plums has dropped.

Vegetables - Losses in incomes from beans and beets has been offset by increases in sweet corn and carrots. Slight decreases in acreage, yields, and prices caused the drop of income for beans and beets, while an increase in acreage and prices have aided the value of sweet corn and carrots.

Small fruits - A substantial increase in this category is aided by increases in acreage, and prices of strawberries, canberries, and blueberries. Income from grapes has risen by 700% but a value of only \$58,000.

Livestock - Except for a slight decrease in income from chicken eggs, all items listed under livestock and poultry products have increased their value mainly due to increased prices.

Although gross incomes are higher overall, the price of every item of production input has also risen. The Extension Service reports that net income for farmers has not increased to the same degree as gross income.

5. Food processing and markets.

The production, processing and marketing of agricultural products is a complex industry. A variety of products, farm practices, and techniques, and regulations help to complicate the picture. For example, agricultural products may be produced for: a) direct consumption on farms where grown or other direct human and/or animal consumption; b) delivery to assembly points where products are graded and stored for future use; and c) delivery directly to a processing plant. Additionally, products may move across county/state lines in either raw or finished form. The marketing process will vary not only between commodities but also for the same commodity. The extent of movement of farm products from farm to consumer depends upon the type of commodity, its perishability, major market outlets and transportation costs. Some recent comments from Agripac, Inc., the major processor in Lane County, illustrate such mechanisms for vegetable and fruit processing and marketing.

"At the present time, growers and processors are faced with increasing costs which are difficult to pass on to the consumer because of a surplus of vegetables. The profit margin for processors is small. Market areas are becoming smaller and more regional in nature due to energy and shipping costs. The western grower can no longer compete with the midwest in supplying the eastern market.

With major companies cutting back, there is a trend toward grower-owned co-op processors. Growers are forced to buy the processing facilities in order to provide a home for the product they raise. This is probably the major factor in maintaining processors. Vegetable production can be very profitable for the grower if he has a market. Today, to get to the market, growers have to be the processor.

Changing market conditions influence processors. At the present time, there is surplus canning capacity because people are not buying canned vegetables as in the past. However, the demand for frozen foods is increasing and freezer capacity is limited. Processors are shifting from canned to frozen and some obsolete plants are being closed.

Product quality is an important factor. The consumer demands top quality products. Many older plants are limited in their ability to process a quality vegetable. The equipment has to be updated or the plants are closed. This modernizing of equipment can be difficult for smaller companies because of today's interest rates.

Prime agricultural land in sufficient quantity is a factor. There is a critical mass of land required to support a food processor. Soil types have to be Class I or II to economically raise vegetables.

Other factors such as environmental restrictions, government regulations, tax systems, location, weather patterns and labor costs also play an important part in maintaining processors.

Currently, the Agripac plants in Eugene and Junction City process green beans, wax beans, romano beans, beets, carrots, corn, sour cherries, sweet cherries, rhubarb, and squash amounting to 95,800 tons of products."

6. Farm Employment

Given the variety and seasonality of farm operations, tenure of operators and the type of organization, it is difficult to assign employment figures to farming. Nevertheless, the following information from the 1978 Census of Agriculture is presented in an attempt to depict the nature of farm employment.

Tenure of Operator

Full time	-	1,310
Part time	-	289
Tenants	-	110

Characteristics of Operators

Male	-	1,582
Female	-	127

Average age - 50.3

Operators by Principal Occupation

Farming	-	584
Other	-	1,125

Hired Farm Labor

Number of Farms	-	662
Expenses	-	\$4,876,000

Farms Reporting Only Workers Working Less than 150 Days

Number of Farms	-	534
Workers	-	2,650
Expenses	-	\$633,000

Farms Reporting Only Workers Working 150 Days or More

Number of Farms	-	35
Workers	-	240
Expenses	-	\$1,292,000

Farms Reporting Workers Working

Number of Farms	-	93
Less than 150 days	-	1,211
150 days or more	-	283
Expenses	-	\$2,951,000

Directly tied to agricultural production is the area's food products manufacturing industry. Again, employment in this sector of the economy varies within a given year, however, generally employment has remained at the same level and it is expected to remain at about 1,200 employees (annual average) in the future. During months of peak production over 1,600 are employed.

7. Markets

As was implied earlier, markets for Lane County farm products range from on-the-farm consumption to international destinations. More specifically these are:

Grains - Most grain is transported to Portland; some may be temporarily stored locally. From Portland, grains reach state, national and international markets.

Hay crops - A large portion of the hay crop is marketed locally; much remains on the same farm.

Seed production - Following harvesting, seed is processed and warehoused locally awaiting shipment to national and international markets.

Field crops - For the most part, this category involves mint for oil. Peppermint is processed and stored locally. Its destination is primarily to chewing gum producers across the nation, with some used by toothpaste manufacturers.

Tree fruits and nuts - Sweet cherries, sour cherries, filberts and walnuts are processed locally for national markets. Much of the apples, peaches and other fruits is consumed locally.

Vegetables - Over 94,000 tons of vegetables will be processed through Lane County Agripac plants to be marketed locally and regionally. Fresh market produce is sold through roadside stands or as "u-pick".

Small fruits - For the most part, berries are consumed locally through roadside stands and "u-pick" fields. Although still small in production numbers, grapes for wine is increasing. Currently, it appears wine distribution is local.

Livestock - Most of the steers and calves produced in the County are exported from the County to feeder lots in the region.

Dairy products - Milk produced in the County is generally marketed locally.

Sheep and lambs - Lambs sold for meat are marketed regionally.

Some of the major agricultural processors are listed in Appendix IV.

8. Agricultural Land Rent Zones

In order to administer the State agricultural land tax program, the local Assessor must establish farm use values for agricultural lands. In cases where values for agricultural land must be determined by utilizing an income approach, rent rates for various portions of the County are calculated. In Lane County, three different rent zones (based on rent rates) are recognized and mapped. The zones are described as: 1) Row Crops; 2) Grains and Grass Seed; and 3) Range Land. The rent values for these zones are based on three factors: water availability, predominant soil type, and distance to market.

Within each zone there is a range of rent values depending upon the above-noted factors. Each zone has a predominance of certain soil types and type of agriculture, hence, the descriptive headings. According to the Assessor's Office, the rent rates and zones are generally accepted by the farming community inasmuch as the rates are reviewed and accepted by a Farm Review Board, which consists of farmers. Rent zones are depicted on Map II.

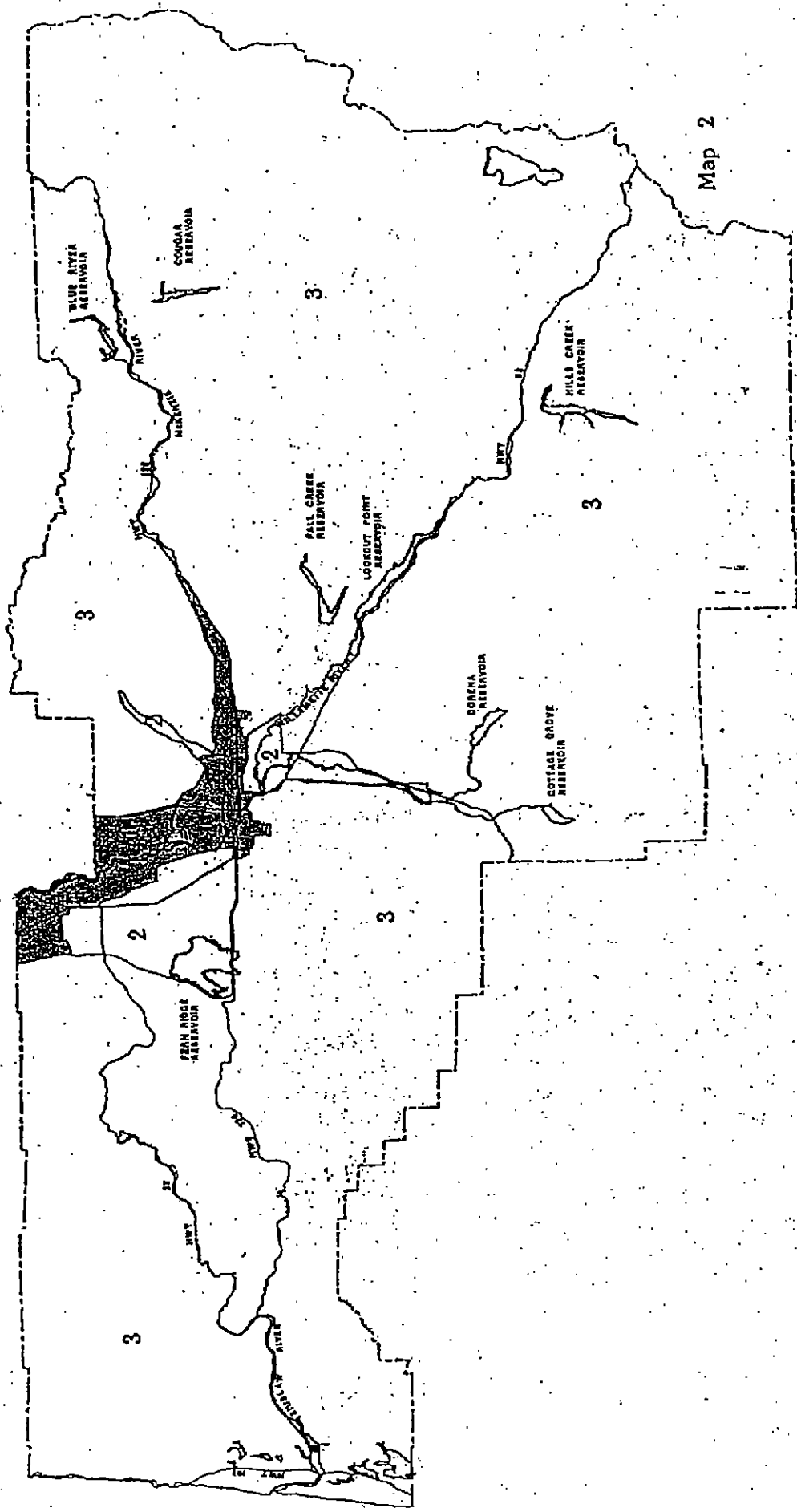
Zone 1 consists of an area located generally along the Willamette River from Eugene north to the County line and along the McKenzie River from its confluence with the Willamette River eastward to Leaburg. Irrigation is presently utilized or the potential for irrigation exists. The area includes processing plants in Eugene and Junction City, and is near plants in Harrisburg. The population center of Eugene/Springfield also serves as a market place for fresh produce. Six soil associations are found in the zone, primarily: Chehalis-Cloquato; Newberg-Cloquato-Camas; Malabon-Salem; and Awbrig-Coburg.

Zone 2 values are found in three locations: 1) between Territorial Road and Highway 99 - River Road, and from Route F to Junction City; 2) from South Springfield south along the Coast Fork Willamette River to Cottage Grove; and 3) along the Mohawk River. Irrigation is used to a lesser degree than zone 1, but does have suitable soil types for irrigation. Much of this zone is situated on the following soil associations: Natroy-Bashaw and Awbrig-Coburg.

The remainder of the County comprises Zone 3. Within Zone 3, less than favorable conditions exist in all or some of the three determining factors.

These zones are pragmatic evidence that there exists a variety of agricultural types within the County. The program has been developed over the years by farm experts, and is adjusted annually.

ASSESSMENT & TAXATION AGRICULTURAL RENT ZONES



HYDROGRAPHY CREDITED FROM LURE
COUNTY ASSESSORS & TAXATION DEPT.

V. DEFINING EXISTING COMMERCIAL FARM ENTERPRISE

Current farming practices including crops grown, size of operations, location of fields and other features which comprise commercial farm enterprises are based on years of adjustment. Constant adjustment occurs as a result of individual operator's decisions in response to changing market conditions, type of land at his/her disposal and the desire to stay in agriculture. The commercial farmer will attempt to organize operations to be productive in the long term as well as the short term. This involves investment in time and equipment and assembly of acreage, and requires a certain level of management skills.

As noted earlier, in determining minimum lot sizes that are appropriate for the continuation of this existing commercial agricultural enterprise within the area, several factors must be considered which are discussed in this report.

Prior to examining acreage requirements of commercial farm units for the Lane County situation, a brief review of other efforts appears relevant, as they (singularly and combined) helped in formulating the direction of this report.

- Douglas County's agricultural report stated that 50 acres was the minimum unit needed for farms (such as horticultural agriculture) on better soils; and 200 acres is needed for grazing and rangeland operations.

- Polk County's agricultural report presented ranges of acreage for various types of farms:

grain or seed production	1,000 - 1,100 acres
filbert	100 - 200 acres
small fruit	80 - 90 acres
orchard	200 - 300 acres
row crops	100+ acres
horticulture	15 - 20 acres
livestock and grain	260 - 300 acres

- A recent correspondence from Agripac, Inc., indicated that the average Agripac row crop farmer farms about 400 acres. Farms range in size from 200 to over 600 acres (only 2/3 of their row crop land will be in vegetable production during any one year; 1/3 of the land will be in a rotation crop such as wheat).

- In a 1975 publication, Smith stated that a minimum farm size can be inferred from changes in farm numbers in different size categories in the US Census of Agriculture. His study was based on data from a midwest state where more homogeneous farm operations occur as opposed to the Lane County situation where a variety of farm products are grown very often within the same operation.

- Recently, in an unpublished report, the Oregon State University Extension Service proposed a method of determining an appropriate minimum lot size for various types of agriculture. The system involved obtaining data on the volume of products sold, the number of farms and farm sizes within various categories of volume sold. For example, if 60 percent of the total volume sold for a particular type of agriculture product was sold by farms having sales of \$100,000 and the typical size of that type of operation in this sales volume category is 100 acres, then 100 acres would be considered the minimum lot size for a commercial farm enterprise for that type of agricultural operation.

- In Oregon State University Extension Service Circular 983, "What Size Farm Does it Take to Earn Your Living in Oregon?", budget summaries for various types of farms for three levels of disposable annual incomes are presented. One type of farm which would be located in Lane County is a vegetable, wheat and small fruit operation. And for this type of farm to produce a disposable family income (before income taxes) of \$15,000 (approximate 1979 median family income in the US) 75 acres was used. This summary does not include costs for a dwelling. So if a dwelling were to be placed on the farm, its investment and maintenance would have to be added to the ledger. It must also be noted that the circular is oriented to different levels of family income and not necessarily to commercial agriculture as described in Goal 3 or the LCDC policy paper.

In attempting to relate the amount and type of land needed for a given type of farm unit within Lane County, it became apparent that such information was not readily available. In retrospect, this is not unusual given the variety of crops, and the diversity of farm practices and physical settings found in Lane County.

Lacking a correlation between crops grown and the number of acres involved with various farming units, along with any definitive information on spatial concentrations of types of agriculture, the Planning Division with the aid of the Extension Service, conducted a mail survey in an attempt to gain such information.

A questionnaire was mailed to 809 addresses from the Extension Service mailing list, and 208 responses were tabulated. The questionnaires consisted of four sections: 1) lands owned, lands rented from others and to others, and total acreage in operation; 2) location of operation; 3) types and acreage of crops and pasture; and 4) disposition of the majority of products, either to processors or direct to consumer.

The responses from within Lane County represent about 12 percent of the number of farmers listed in the 1978 Census of Agriculture and accounted for 19 percent of the acreage in farms. The following information was derived from the responses.

1. Of the total acreage involved in the farms, 47 percent was land rented from others. Farm operations range in size from one acre to 2000+ acres.
2. Fifty-three percent of the respondents sold a majority of their products to processors as opposed to directly to consumers. However, farms

- l. Pasture - cattle and sheep
 - m. Pasture - dairy products
4. The vast majority of farms have more than one product type. Typically, different associations of product types occur within different areas (rent zones), as will be indicated below.
5. Plotting the location of the reported types of agricultural products on a map of this County reveals a vague pattern of spatial concentration of agricultural types. Overlaying Assessment and Taxation Rent Zones* helps define a pattern. In order to quantify the character of the distribution of agricultural types, product types within each rent zone were ranked according to: 1) number of occurrences and 2) total acreage, for all farms and for farms indicating a majority of products sold to processors. The following is a comparison of the above-noted data (product types are listed in decreasing order of occurrence and acreage for the upper one-half of the respective listing):

Associations For All Farms Reporting

Rent Zone 1

Frequency: Orchards, Grain, Vegetables, Field Crops, Hay - Cattle*, Woodlot

Acreage: Grain, Grass Seed, Vegetables, Field Crops, Orchards, Woodlot, Other Seed

Rent Zone 2

Frequency: Orchards, Hay, Grain, Cattle, Woodlot, Small Fruit - Vegetables

Acreage: Grain, Grass Seed, Orchard, Hay, Woodlot, Vegetables, Field Crops

Rent Zone 3

Frequency: Woodlot, Cattle, Hay, Orchard, Grain, Small Fruit - Miscellaneous

Acreage: Woodlot, Cattle, Hay, Grass Seed, Grain

* For the purpose of describing spatial concentrations of types of agriculture, Assessment and Taxation Rent Zones are considered a valid system inasmuch as: 1) it is based on an intimate knowledge of farming practices, 2) it has been developed over many years, allowing annual adjustments in rates within more or less fixed boundaries, and 3) it reflects economic conditions.

Associations for Farms Reporting a
Majority of Products Sold to Processors

Rent Zone 1

Frequency: Grain, Orchards, Vegetables, Field Crops, Other Seed, Hay -
Woodlot - Cattle

Acreage: Grain, Vegetables, Grass Seed, Field Crops, Orchard, Woodlot,
Other Seed

Rent Zone 2

Frequency: Orchard, Grain, Hay, Grass Seed, Woodlot - Cattle, Field Crops.

Acreage: Grain, Grass Seed, Hay, Orchard, Field Crops, Vegetables,
Woodlot

Rent Zone 3

Frequency: Woodlot, Cattle, Hay, Orchard, Grain, Grass Seed, Field Crops -
Vegetables - Christmas trees

Acreage: Woodlot, Cattle, Hay, Grain, Grass Seed, Dairy, Vegetables

From the data derived from the farm survey, average farm size, and the 20 and 25 percentiles of total acreage, were calculated for farms reporting a majority of products sold to processors by rent zone. These figures will reveal some quantitative indicators of acreage involved in commercial farm enterprises within three different areas of the County.

Rent Zone	Average Farm Size (acres)	20 Percentile ⁺ (acres)	25 Percentile ⁺ (acres)
1	390	423	550
2	225	160	210
3	235	190	200

* Hyphenated words denote equal ranking.

+ Percentiles were calculated in an attempt to justify a value more reflective of a minimum acreage for commercial operations other than average farm size. Average farm size indicates a central tendency of the data and not necessarily a value associated with an acceptable minimum threshold.

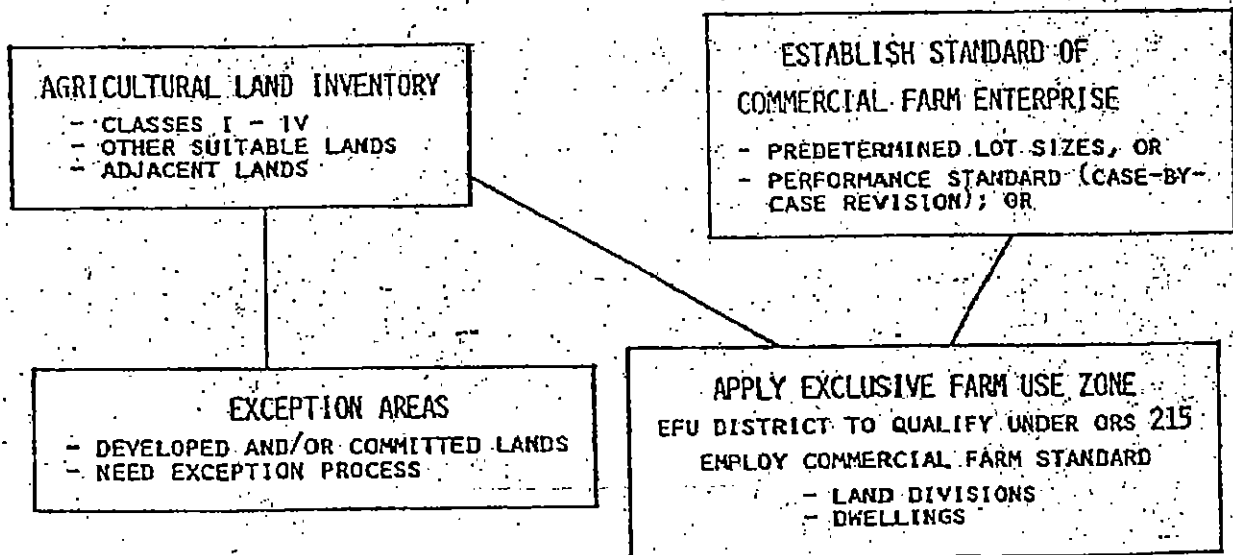
The above-listed data reveals:

1. Agricultural operations vary between Rent Zones.
2. There is a close association between all farms and farms reporting a majority of products sold to processors (commercial farms) within the same Rent Zone.
3. The average farm size (total land in farm operation, contiguous and noncontiguous lands) varies between Rent Zones.
4. Percentile values are larger than average farm size because there are many parcels with small acreage compared to fewer large parcels containing the bulk of farm acreage. This fact reinforces data from the 1978 US Census of Agriculture.
5. The 20th percentile indicates that 80 percent of the acreage within the commercial farms category are in farm units larger than 423 acres in Rent Zone 1; 160 acres in Rent Zone 2; and 190 acres in Rent Zone 3.

VI. COUNTY'S ROLE

Information contained in the report as it is currently published or as it may be amended in the future will be the basis for setting the direction of policies and implementing measures which will constitute the County's program to preserve and maintain agricultural lands.

At this point a review of the interrelations between the Goal and statute requirements would help focus on those items needing attention. The following diagram and explanation illustrates the interrelationships.



- Agricultural lands must be inventoried.

The County's previous effort emphasized two categories of agricultural land; important, and limited, with another category of "marginal agricultural land" being designated rural land. Goal No. 3 does not allow different treatment for differing types of agricultural land; specifically, pasture or grazing land is considered agricultural land and must be inventoried and be zoned accordingly. Section III, A.3. describes the SCS Land Capability Classification System and presents three categories of farmland based on the SCS Farmland Inventory. These three categories are intended to represent the inventory of agricultural land in Lane County.

- Goal No. 3 requires that the standard for minimum lot sizes in EFU zones must be "appropriate for the continuation of existing commercial agricultural enterprise within the area."

As Noted in Section II,3. executing this requirement involves:

1. Commercial agriculture enterprise(s) must be identified and only such enterprises can be used in setting the standard.
2. The distinction between commercial farm parcels and noncommercial farm parcel is needed for:
 - a) approving land divisions
 - b) issuing building permits for residences and other structures for farm uses only.
3. All lands involved in farm operation must be considered when evaluating commercial farm parcels. This includes lands owned plus land rented; contiguous and noncontiguous.
4. Establishing a method of applying minimum lot standard, either fixed acreage(s) or case-by-case process, or a combination of the two.

Currently, Lane County's Agricultural Policy No. 3 states that performance standards, rather than arbitrary minimum parcel requirements, should be emphasized. Attempts have been made to develop an exclusive farm use zone that is flexible and would reflect local variations in farming types. Thus far, a workable zoning district has not been developed. This may have been caused by a lack of definitive information about the spatial distribution of farming types and perhaps a general reluctance by the County to impose large lot zoning to any property. Regardless of why a standard or process has not been found workable, it would be well to review the pros and cons of applying fixed minimum lot size(s) or a case-by-case process. The following matrix ranks features of each system in three levels: good, fair, poor. Following the matrix is a brief discussion of each feature.

Feature	Fixed Minimum Lot Size(s)	Case-by-Case process
Predictability	Good	Poor
Flexibility	Fair	Good
User Comprehension	Good	Fair
Efficiency		Fair
- Time	Good	Poor
- Expense	Good	

Predictability. This feature has to do with the fact that a land owner knows in advance how much area is needed per parcel for a land division or to locate a farm dwelling. With a fixed standard, the area requirement is known. With no fixed standard, every time a party wished to locate a dwelling on a parcel or wished to divide land, an inventory of all farms within a given radius would have to be conducted. A property owner would not know in advance what parcel size would be acceptable.

Flexibility. This feature recognizes that farming is a variable enterprise in terms of natural physical conditions, crops grown, and other conditions. A variation in any one condition could create different needs in the amount of land needed for farming. A fixed parcel size would presumably be applied to a large area, with local differences not taken into account. All farms would be treated uniformly. A case-by-case process would treat each farm operation as a unique enterprise and would be evaluated on the basis of other operations in the more immediate vicinity.

User Comprehension. A comprehensible requirement is one that can be understood by everyone without confusion as to what is being required plus ... how a flexible system even works would be harder to fathom. As noted above, a fixed minimum parcel size would be known before or after the need for any permits. A flexible standard could result in neighboring farms having different requirements based on different inventory areas. The farm operator could question requirements and not willing to accept the difference particularly if his requirement is larger than his neighbor's.

Efficiency. Efficiency can be looked at in terms of time and expense, but in the final analysis both involve costs to the property owner and the County. A fixed parcel size standard would involve relatively less time and expense inasmuch as a request for a dwelling or land division either does or does not meet the standard. In a case-by-case process time and expense would be involved first of all in an inventory of farms and secondly in a public review process. Such a process includes appeal rights by anyone who may disagree with the inventory or any decision. In other words, every application for a dwelling or land division is appealable, which involves time delays and expense, both for the applicant and County.

This review of the pros and cons of two ways of applying the standard for minimum parcel sizes in EFU zones is intended to aid the reader in determining which system ought to be utilized in the County's efforts to

comply with Goal 3 zoning requirements.

Inventoried agricultural lands must be zoned Exclusive Farm Use (EFU) unless they are designated forest land or the lands qualify for an exception according to Goal No. 2 procedures. Furthermore, the County's EFU zone(s) must qualify under ORS 215.

ORS 215 lists permitted farm and nonfarm uses. Dwellings are permitted outright if in conjunction with a farm use. Nonfarm dwellings are subject to review and must meet certain criteria. Goal No. 3 through the minimum lot size standard, establishes the threshold for farm uses.

VII. Policies

A. Current Policies

Although the Oregon Land Conservation and Development Commission concluded that Lane County did not comply with statewide Goal 3, it did state that the submitted Policies were adequate. For that reason those Policies* are listed below:

1. Encourage agricultural activities by preserving and maintaining agricultural lands through the use of exclusive farm use zones.
2. Reserve the use of the best agricultural soils exclusively for agricultural purposes.
3. Insure that zoning districts applied to agricultural lands encourage valid agricultural practices in a realistic manner; emphasis shall be placed on performance rather than arbitrary requirements such as minimum parcel sizes.
4. Distinguish prime and locally important lands from other agricultural lands. Use planning and implementation techniques that reflect appropriate uses and treatment for each type of land.
5. Encourage irrigation, drainage and flood control projects that benefit agricultural use with minimum environmental degradation in accordance with existing state and federal regulations.
6. Discourage the use of drainage projects to convert planned agricultural and other natural resource land to nonnatural resource land uses.
7. Some agricultural land in Lane County is not suitable or available for agricultural use by nature of being built upon, committed to, or needed for nonagricultural uses. The County shall plan and zone such lands for nonagricultural uses by using the exceptions process of LCDC Goal 2, Part II.

* Reprinted from County Goals and Policies Tabloid, 1980.

8. Provide maximum protection to agricultural activities by minimizing activities, particularly residential, that conflict with such use. Whenever possible, planning goals, policies and regulations should be interpreted in favor of agricultural activities.
9. Actively explore better methods of identifying agricultural lands than those currently used. Such methods should accurately reflect the productive capacity of the land taking into account fertility, suitability for management, climatic conditions, availability of water, land use patterns and accepted farm practices.
10. Such minimum lot sizes or land division criteria as are used in exclusive farm use zones shall be appropriate for the continuation of the existing commercial agricultural enterprise in the area.
11. Conversion of rural agricultural land to urbanizable land shall follow the process and criteria set forth in LCDC Goal 3.

B. Comments

Policy 3 implies performance standards on a case-by-case basis. If the County decides to apply fixed and minimum lot size(s), this policy will have to be amended.

Because of their acceptance by LCDC, existing policies should be given consideration for continued use with the possible exception of the Policy 3 as noted above.

Appendix A

"Agricultural Land Use Policy"

(see Oregon Revised Statute 215.243)

- (1) Open land used for agricultural use is an efficient means of conserving natural resources that constitute an important physical, social, aesthetic and economic asset to all of the people of this state, whether living in rural, urban or metropolitan areas of the state.
- (2) The preservation of a maximum amount of the limited supply of agricultural land is necessary to the conservation of the state's economic resources and the preservation of such land in large blocks is necessary in maintaining the agricultural economy of the state and for the assurance of adequate, healthful and nutritious food for the people of this state and nation.
- (3) Expansion of urban development into rural areas is a matter of public concern because of the unnecessary increases in costs of community services, conflicts between farm and urban activities and the loss of open space and natural beauty around urban centers occurring as the result of such expansion.
- (4) Exclusive farm use zoning as provided by law, substantially limits alternatives to the use of rural land, and with the importance of rural lands to the public, justifies incentives and privileges offered to encourage owners of rural lands to hold such land in exclusive farm use zones.

Appendix B

Definitions from Statewide Planning Goal No. 3

AGRICULTURAL LAND -- in western Oregon is land of predominantly Class I, II, III and IV soils and in eastern Oregon is land of predominantly Class I, II, III, IV, V and VI soils as identified in the Soil Capability Classification System of the United States Soil Conservation Service, and other lands which are suitable for farm use taking into consideration soil fertility, suitability for grazing, climatic conditions, existing and future availability of water for farm irrigation purposes, existing land use patterns, technological and energy inputs required, or accepted farming practices. Lands in other classes which are necessary to permit farm practices to be undertaken on adjacent or nearby lands, shall be included as agricultural land in any event.

More detailed soil data to define agricultural land may be utilized by local governments if such data permits achievement of this goal.

FARM USE -- is as set forth in ORS 215.203 and includes the non-farm uses authorized by ORS 215.213.

Appendix C
SOIL MAPPING UNITS
Lane Soil Survey Area

Map Symbol	Mapping Unit (Soil Name)	Capability Class
1A, 2A	CAMAS Gravelly Sandy Loam, occasionally flooded	IVw
4A	CLOQUATO Silt Loam	IIw
5A	PITS	
8A	BEACHES	
10A	NEWBERG Fine Sandy Loam	IIw
11A	NEWBERG Loam	IIw
20A	BRALLIER Muck, drained	IVw
21A	BRALLIER VARIANT Muck	Vw
30A	CHEHALIS Silty Clay Loam, occasionally flooded	IIw
31A	CHAPMAN Loam	I
40A	McBEE Silty Clay Loam	IIw
50A, 51A	WAPATO Silty Clay Loam	IIIw
55A	CONSER Silty Clay Loam	IIIw
60A, 61A	BASHAW Clay	IVw
72K	DUNE LAND	VIIIe
72KS	WALDPORT Fine Sand, thin surface, 0-30% slopes	VIIe
75A	RIVERWASH	VIIIw
76A	FLUENTS, nearly level (Alluvial Land)	VIIw
77K	TERRACE ESCARPMENT (Ochrepts & Umbrepts, very steep)	VIe
80A	ABIQUA Silty Clay Loam, 0-3% slopes	I
81B	ABIQUA Silty Clay Loam, 3-5% slopes	IIe

Map Symbol	Mapping Unit (Soil Name)	Capability Class
90A	McALPIN Silty Clay Loam	IIw
100A	WALDO Silty Clay Loam	IIIw
110A, 223A	NATROY Silty Clay Loam	IVw
111A	NATROY Silty Clay	IVw
120A, 121A	PENGRA Silt Loam, 1-4% slopes	IIIw
130A	NEKOMA Silt Loam	IIIw
135A	WILLANCH Fine Sandy Loam	IIIw
140A	BRENNER Silty Clay Loam	IIIw
145A	NESTUCCA Silt Loam	IIw
150A	NEHALEM Silt Loam	Iw
165B	HAFLINGER-JIMBO COMPLEX, 0-5%	VI s
166B	JIMBO-HAFLINGER COMPLEX, 0-5% slopes	III s
203A	WOODBURN Silt Loam	IIw
204A	HECETA Fine Sand, 0-2% slopes	VIw
205C	WALDPORT Fine Sand, 0-12% slopes	VIe
206D	WALDPORT Fine Sand, 12-30% slopes	VIIe
207H	WALDPORT Fine Sand, 30-70% slopes	VIIe
210C	CUPOLA Cobbly Loam, 3-12% slopes	VI s
211D	CUPOLA Cobbly Loam, 12-30% slopes	VI s
214B	BANDON Sandy Loam, 0-7% slopes	IV s
215C	BANDON Sandy Loam, 7-12% slopes	IVe
216D, 217H	BANDON Sandy Loam, 12-50% slopes	VIe
221A, 222A	DAYTON Silt Loam, clay substratum	IVw
225A	YAQUINA Loamy Fine Sand	IVw
230B	BULLARDS-FERRELO COMPLEX, 0-7% slopes	III s
231C	BULLARDS-FERRELO COMPLEX, 7-12% slopes	IIIe

Map Symbol	Mapping Unit (Soil Name)	Capability Class
232D	BULLARDS-FERRELO COMPLEX, 12-30% slopes	IVe
233F	BULLARDS-FERRELO COMPLEX, 30-60% slopes	VIe
234A	HOLCOMB Silty Clay Loam	IIIw
235B, 245B	LINT Silt Loam, 0-7% slopes	IIe
236C	LINT Silt Loam, 7-12% slopes	IIIe
237D	LINT Silt Loam, 12-20% slopes	IVe
238F	LINT Silt Loam, 20-40% slopes	VIe
240C	NETARTS Fine Sand, 3-12% slopes	VIe
241D	NETARTS Fine Sand, 12-30% slopes	VIe
250D	NESKOWIN Silt Loam, 12-20% slopes	IVe
251F	NESKOWIN Silt Loam, 20-40% slopes	VIe
252K	NESKOWIN-SALANDER COMPLEX, 40-60% slopes	VIe
256D, 255C	HEMBRE Silt Loam, 5-25% slopes	VIe
257K	HEMBRE Silt Loam, 25-60% slopes	VIe
260A	MALABON Silty Clay Loam	I
270A	COBURG Silty Clay Loam	IIw
280A	AWBRIG Silty Clay Loam	IVw
290A	SALEM Gravelly Silt Loam	IIs
300A	OXLEY Gravelly Silt Loam	IIIw
310A	COURTNEY Gravelly Silty Clay Loam	IVw
322A, 320A	SIFTON Gravelly Loam	IIIs
330B	SALKUM Silty Clay Loam, 2-8% slopes	IIe
331C	SALKUM Silty Clay Loam, 8-16% slopes	IIIe
335B	SALKUM Silt Loam, 2-6% slopes	IIe
350A	NOTI Loam	IVw
351A	LINSLAW Loam	IIIw

Map Symbol	Mapping Unit (Soil Name)	Capability Class
360E	VENTETA Loam, 0-7% slopes	IIE
361B	VENETA VARIANT Silt Loam, 0-7% slopes	IIE
374C	DIXONVILLE-PHILOMATH-HAZELAIR COMPLEX, 3-12% slopes	VIe
375S, 523C	DIXONVILLE-PHILOMATH-HAZELAIR COMPLEX, 12-35% slopes	VIe
380B	EILERTSEN Silt Loam	IIE
385B	JIMBO Silt Loam	I
395B	MEDA Loam, 2-12% slopes	IIIe
406D	DIXONVILLE Silty Clay Loam, 12-30% slopes	IVe
407B	MARCOLA Cobbly Silty Clay Loam, 2-7% slopes	IVs
408C	DIXONVILLE Silty Clay Loam, 3-12% slopes	IIIe
409F	DIXONVILLE Silty Clay Loam, 30-50% slopes	VIe
414C, 415C	PHILOMATH Cobbly Silty Clay, 3-12% slopes	VI s
415S, 417F	PHILOMATH Cobbly Silty Clay, 12-45% slopes	VI s
416C, 416S	PHILOMATH Silty Clay, 3-12% slopes	VIe
420B, 425B	NEKIA Silty Clay Loam, 2-12% slopes	IIIe
421C, 426C	NEKIA Silty Clay Loam, 12-20% slopes	IIIe
422E, 422D 427E	NEKIA Silty Clay Loam, 20-30% slopes	IVe
423F	NEKIA Silty Clay Loam, 30-50% slopes	VIe
430B	STEIWER Loam, 3-12% slopes	IIIe
431C	STEIWER Loam, 12-20% slopes	IVe
432E	STEIWER Loam, 20-50% slopes	VIe
440S	WITZEL Very Cobbly Loam, 3-30% slopes	VI s
441K	WITZEL Very Cobbly Loam, 30-75% slopes	VII s
445B	SATURN Clay Loam	III s

Map Symbol	Mapping Unit (Soil Name)	Capability Class
446B	BRIEDWELL Cobbly Loam, 0-7% slopes	IIIe
450S	KINNEY Cobbly Loam, 3-20% slopes	VIe
451K	KINNEY Cobbly Loam, 20-50% south slopes	VIe
451KN	KINNEY Cobbly Loam, 20-50% north slopes	VIe
452H	KINNEY Cobbly Loam, 50-70% south slopes	VIIe
452HN	KINNEY Cobbly Loam, 50-70% north slopes	VIIe
453S, 619S 655S	KINNEY Cobbly Loam, slump, 3-30% slopes	VIe
460S	BLACHLY-McCULLY COMPLEX, 3-30% slopes	VIe
461K	BLACHLY Clay Loam, 30-50% slopes	VIe
461KN	BLACHLY Clay Loam, 50-70% slopes	VIIe
462H	McCULLY Clay Loam, 30-50% slopes	VIe
462HN	McCULLY CLAY LOAM, 50-70% slopes	VIIe
464S	BLACHLY Silty Clay Loam, 3-30% slopes	VIe
465K, 466K	BLACHLY Silty Clay Loam, 30-50% slopes	VIe
469C	RITNER Cobbly Silty Clay Loam, 2-12% slopes	IVs
471K	RITNER Cobbly Silty Clay Loam, 30-60% slopes	VIIIs
474E, 470S 405C	RITNER Cobbly Silty Clay Loam, 12-30% slopes	VIs
475C, 365B	PANTHER Silty Clay Loam, 2-12% slopes	VIw
477C	DUPEE Silt Loam, 3-20% slopes	IIIe
480B	BELLPINE Silty Clay Loam, 3-12% slopes	IIIe
481C, 636D	BELLPINE Silty Clay Loam, 12-20% slopes	IIIe
482E, 637E	BELLPINE Silty Clay Loam, 20-30% slopes	IVe
483F	BELLPINE Silty Clay Loam, 30-50% slopes	VIe
484D, 638D	BELLPINE Cobbly Silty Clay Loam, 2-30% slopes	IVe
486S	PEAVINE Silty Clay Loam, 3-30% slopes	VIe

Map Symbol	Mapping Unit (Soil Name)	Capability Class
487K, 488H	PEAVINE Silty Clay Loam, 30-60% slopes	VIe
490B	WILLAKENZIE Clay Loam, 2-12% slopes	IIIe
491C	WILLAKENZIE Clay Loam, 12-20% slopes	IIIe
492D	WILLAKENZIE Clay Loam, 20-30% slopes	IVe
493F	WILLAKENZIE Clay Loam, 30-50% slopes	VIe
496K	ATRING-ROCK OUTCROP COMPLEX, 30-60% slopes	VIIe
500C, 500S	CHEHULPUM Silt Loam, 3-12% slopes	VIe
501E, 500S 501F	CHEHULPUM Silt Loam, 12-40% slopes	VIe
515S, 510B 511C, 512D	HULLT Loam, 2-30% slopes	IVe
516K	HUULT Loam, 30-60% slopes	VIe
520B	HAZELAIR Silty Clay Loam, 2-7% slopes	IIIe
521C	HAZELAIR Silty Clay Loam, 7-20% slopes	IVe
525S	HUMMINGTON Gravelly Loam, 5-25% slopes	VI s
526K	HUMMINGTON Gravelly Loam, 25-50% slopes	VI s
527H	HUMMINGTON Gravelly Loam, 50-75% slopes	VII s
530S, 531S	MULKEY Loam, 5-25% slopes	VIe
540S	ASTORIA VARIANT Silt Loam, 3-30% slopes	VIe
541K	ASTORIA VARIANT Silt Loam, 30-60% slopes	VIe
543H	FORMADER-HEMBRE-KLICKITAT COMPLEX, 50-80% slopes	VIIe
546S	ASTORIA Silt Loam, 5-30% slopes	VIe
550B	JORY Silty Clay Loam, 2-12% slopes	IIIe
551C	JORY Silty Clay Loam, 12-20% slopes	IIIe
552E	JORY Silty Clay Loam, 20-30% slopes	IVe
560S	HONEYGROVE Silty Clay Loam, 3-25% slopes	VIe
561K	HONEYGROVE Silty Clay Loam, 25-50% slopes	VIe

Map Symbol	Mapping Unit (Soil Name)	Capability Class
562S	FORMADER Loam, 3-30% slopes	VIe
563K	FORMADER Loam, 30-60% slopes	VIe
566D, 565D	FENDALL Silt Loam, 3-30% slopes	IVe
567S, 568K	TAHKENITCH Loam, 20-45% slopes	VIe
569H	TAHKENITCH Loam, 45-75% slopes	VIIe
570S	BOHANNON Gravelly Loam, 3-25% slopes	VIe
571K	BOHANNON Gravelly Loam, 25-50% slopes	VIe
572H	BOHANNON Gravelly Loam, 50-90% slopes	VIIe
575S	PREACHER Loam, 0-25% slopes	VIe
576K	PREACHER Loam, 25-50% slopes	VIe
577H	PREACHER-BOHANNON-SLICKROCK COMPLEX, 50-75% slopes	VIIe
580S	DIGGER Gravelly Loam, 10-30% slopes	VIe
581K	DIGGER Gravelly Loam, 30-50% slopes	VIe
582H	DIGGER Gravelly Loam, 50-85% slopes	VIIe
585S	SLICKROCK Gravelly Loam, 3-25% slopes	VIe
586K	SLICKROCK Gravelly Loam, 25-50% slopes	VIe
590S	SALANDER Silt Loam, 12-30% slopes	VIe
600K	KILCHIS Stony Loam, 30-60% slopes	VIIs
601H	KILCHIS Stony Loam, 60-90% slopes	VIIIs
616S	KLICKITAT Stony Loam, 3-30% slopes	VIIs
617K	KLICKITAT Stony Loam, 30-50% south slopes	VIIs
617KN	KLICKITAT Stony Loam, 30-50% north slopes	VIIs
618H	KLICKITAT Stony Loam, 50-75% south slopes	VIIIs
618HN	KLICKITAT Stony Loam, 50-75% north slopes	VIIIs
620S	HEMBRE-KLICKITAT COMPLEX, 3-30% slopes	VIe
621K	KEMBRE-KLICKITAT COMPLEX, 30-60% slopes	VIe

Map Symbol	Mapping Unit (Soil Name)	Capability Class
625S	HOLDERMAN Extremely Cobbly Loam, 5-25% slopes	VIc
626K	HOLDERMAN Extremely Cobbly Loam, 25-50% slopes	VIc
627H	HOLDERMAN Extremely Cobbly Loam, 50-75% slopes	VIIc
630S	CRUISER Gravelly Clay Loam, 3-25% slopes	VIe
631K	CRUISER Gravelly Clay Loam, 25-50% slopes	VIe
632H	CRUISER Gravelly Clay Loam, 50-75% slopes	VIIe
640S	KEEL Cobbly Clay Loam, 3-25% slopes	VIe
641K	KEEL Cobbly Clay Loam, 25-45% slopes	VIe
642H	KEEL Cobbly Clay Loam, 45-75% slopes	VIIe
650S	CUMLEY Silty Clay Loam, 2-20% slopes	VIe
670S	McDUFF Clay Loam, 3-25% slopes	VIe
671K	McDUFF Clay Loam, 25-50% slopes	VIe
672H	McDUFF Clay Loam, 50-70% slopes	VIIe
690S, 620S	MINNIECE Silty Clay Loam, 0-8% slopes	VIw
700K	ROCK OUTCROP-KILCHIS COMPLEX, 30-90% slopes	VIIIc
700KX	ROCK OUTCROP-WITZEL COMPLEX, 10-70% slopes	VIIIc
701K, 702H	WINBERRY Very Gravelly Loam, 10-45% slopes	VIIc
706K	YELLOWSTONE-ROCK OUTCROP COMPLEX, 10-60% slopes	VIIIc
W	Water - bodies less than 40 acres or one-eighth mile wide	

Source: US Department of Agriculture, Soil Conservation Service,
Preliminary Draft of Lane County Soil Survey

Appendix D
 Selected Agricultural Processors
 in Lane County and Vicinity

<u>Product and Firm</u>	<u>Location</u>
Field and Seed Processors	
Agricultural Service Corporation	Harrisburg
Forbes Seed and Grain, Inc.	Junction City
Kropf Feed and Seed	Harrisburg
Smucker Wilton Warehouse	Harrisburg
Wilcox Seed Company	Harrisburg
H & E Feeds	Eugene
Gold Coast Seed Company	Harrisburg
Lowell Warehouse	Harrisburg
Fruits and Vegetables	
Agripac, Incorporated	Eugene Junction City
Nuts	
Brunner Dryer	Eugene
Alvadore Dryer	Alvadore
Miller Dehydrator Company	Eugene
Poultry	
Willamette Poultry Company	Creswell
Dairy Products	
Echo Spring Dairy	Eugene
Darigold	Eugene
Dutch Girl (ice cream)	Eugene
Lochmead Dairy	Junction City
Springfield Creamery	Springfield

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