3.12 Farmland

The conversion of farmland to transportation uses and the disruption to the remaining farming operations were major environmental concerns of the SR 167 *Tier I EIS and the Tier II EIS Study Plan* (Study Plan) (Washington State Department of Transportation [WSDOT] 2000). In addition to the direct loss of farmland to highway right-of-way (ROW), highways may increase the pressure for conversion from farming to other uses. Conversion may indirectly occur when agricultural parcels are cut off or stranded.

This chapter examines the impacts of the SR 167 project on farmlands in the study area. Farmlands are protected by both federal and state legislation. The Federal Farmland Protection Policy Act (FPPA) (7 USC 4201-4209) is intended to minimize the extent to which federal activities contribute to the conversion of farmland to non-agricultural uses. The FPPA requires federal agencies to examine the impact of their programs before they approve any activity that would convert farmland.

The environmental screening criteria in the Study Plan include two that address farmlands: the acres of impacts to prime and unique farmlands under the FPPA and to farmlands in general. The double weight given to farmland emphasizes the significance placed on impacts to these properties.

3.12.1 Studies Performed and Coordination Conducted

This chapter incorporates information compiled in the *SR 167 Tier II EIS Land Use/Farmland/Social-Economic Discipline Report* (WSDOT 2004) and supporting memoranda.

The current comprehensive plans and zoning regulations for the City of Tacoma (1999), City of Fife (1996), City of Puyallup (1994), City of Milton (2002), and Pierce County (1998) were used for all analysis performed. Zoning designations in the study area were obtained from the following sources: City of Fife zoning map (2000); Pierce County map of zones designated "general" and plat maps with zoning overlays (2000); City of Puyallup zoning map (2000); City of Milton zoning map (2002); and City of Tacoma zoning map (2000). This information was supplemented and updated as necessary.

Under the FPPA, federal agencies are required to submit a Farmland Conversion Impact Rating (Form NRCS-CPA-106 for Corridor type projects) to the Natural Resources Conservation Service (NRCS). The NRCS uses this information to evaluate whether there are farmlands subject to the FPPA requiring protection in the project area. Farmlands that score 160 points or less do not need to be given further consideration for protection by the federal agency (7 CFR 658.4). The FPPA farmlands within the project study area, including the Riparian Restoration Proposal and a 150-acre potential wetland mitigation site, scored 153.6 points and therefore fall into this category (Table 3.12-1). This total score is 10.1 points lower than that reported in the DEIS, mostly because an updated NRCS soil evaluation re-designated some prime farmland in the county – not in the project area – to lower rated farmlands of statewide and local importance (WSDOT

2004). While not subject to protection under the FPPA, the farmlands in the study area are still subject to evaluation under the National Environmental Policy Act of 1969 and the State Environmental Policy Act.

3.12.2 Affected Environment

Since Tier I, the City of Fife has annexed most of the unincorporated county portions that lie within the study area. Over the past few years, the conversion of lands currently in agricultural production to urban uses has escalated. Most of the land in agricultural production within the study area is located in the city of Fife.

None of the applicable comprehensive plans designate lands within the study area for long-term agricultural use under the state Growth Management Act. The highest and best use of parcels within the project area is typically manufacturing or industrial, with occasional pockets of residential uses. However, the cities of Fife and Puyallup encourage and support continued agricultural uses until such time as conversion occurs.

Farmland, as defined in the FPPA, refers to land in any of four different categories: (1) prime farmland, (2) unique farmland, (3) farmland other than prime or unique that is of statewide importance, or (4) farmland other than prime or unique that is of local importance. These categories are based on soil types rather than farming activity (Natsuhara 2000). Farmland in Pierce County and in the proposed study area has been identified as prime farmland.

Prime farmland is land that has the best combination of desirable physical and chemical characteristics and minimum costs for producing agricultural crops. Prime farmland includes land currently in use as cropland, pastureland, rangeland, or forestland. The land must also not be in or committed to urban development or water storage. Such land includes land with a density of 30 structures per 40-acre area. All of the lands in the study area that are actively farmed and not committed to urban development qualify as prime farmland under the FPPA.

The NRCS evaluation identified 395,160 acres as farmable within Pierce County, 98 percent of which fall under the definitions of farmland in the FPPA. Approximately 3.4 percent of the farmable land in Pierce County has an equal or higher relative value as that of the soil identified in the proposed project corridor. According to the NRCS evaluation, the amount of farmland that would be converted in the proposed project corridor accounts for 0.15 percent of the farmland in Pierce County (Natsuhara 2004). Figure 3.12-1 depicts land under cultivation in 2001 within and adjacent to the study area. There are no parcels along the proposed SR 167 mainline north of I-5 nor adjacent to the SR 161/167 interchange that are actively farmed, although there are parcels labeled as agricultural in the Tax Assessor's database in this area.

Table 3.12-1: Farmland Conversion Impact Rating

U.S. DEPARTMENT OF AGRICULTURE
Natural Resources Conservation Service

NRCS-CPA-106
(Rev. 1-91)

FARMLAND CONVERSION IMPACT RATING
FOR CORRIDOR TYPE PROJECTS

PART I *(To be completed by Federal Agency)*		3. Date of Land Evaluation Request: 5/7/04	4. Sheet 1 of 1
1. Name of Project: SR 167 EIS Tier II		5. Federal Agency Involved: FHWA	
2. Type of Project: New Highway		6. County and State: Pierce, WA	
PART II *(To be completed by NRCS)*		1. Date Request Received by NRCS: 5/10/04	2. Person Completing Form: C. Natsuhara
3. Does the corridor contain prime, unique statewide or local important farmland? (If no, the FPPA does not apply - Do not complete additional parts of this form)		YES [X] NO [ ]	4. Acres Irrigated: N/A; Average Farm Size: 51
5. Major Crop(s): grass-legume hay, truck crops, pasture	6. Farmable Land In Government Jurisdiction: Acres: 395,160 % 50		7. Amount of Farmland As Defined in FPPA: Acres: 387,633 % 49
8. Name Of Land Evaluation System Used: Draft Pierce County	9. Name of Local Site Assessment System: None		10. Date Land Evaluation Returned by NRCS: 5/27/04

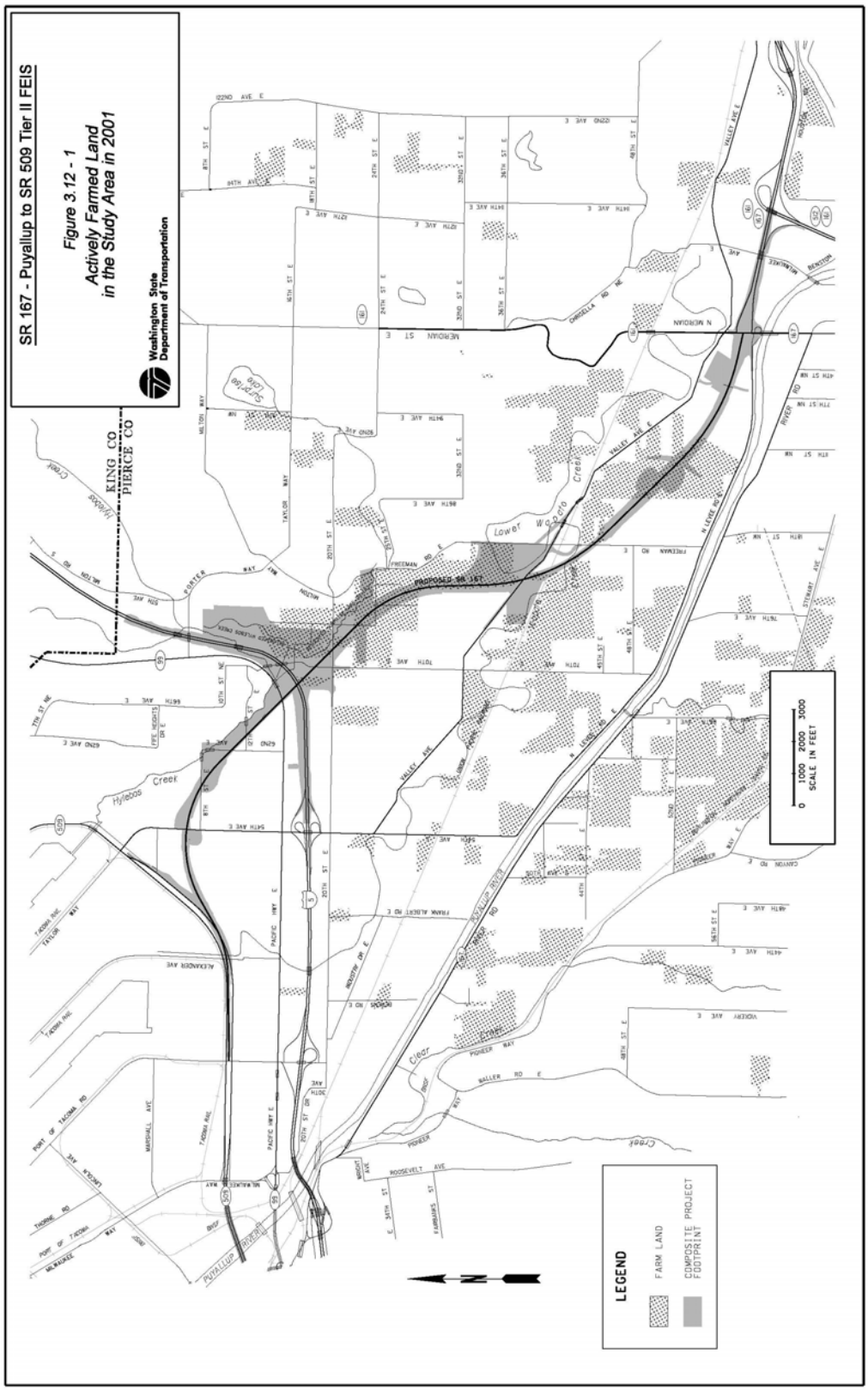
PART III *(To be completed by Federal Agency)*	Alternative Corridor For Segment			
	Corridor A	Corridor B	Corridor C	Corridor D
A. Total Acres To Be Converted Directly	525.7			
B. Total Acres To Be Converted Indirectly, Or To Receive Services	69.9			
C. Total Acres In Corridor	595.6	0	0	0
PART IV *(To be completed by NRCS) Land Evaluation Information*				
A. Total Acres Prime And Unique Farmland	590.6			
B. Total Acres Statewide And Local Important Farmland	0			
C. Percentage Of Farmland In County Or Local Govt. Unit To Be Converted	0.15%			
D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value	3.4%			
PART V *(To be completed by NRCS) Land Evaluation Information Criterion Relative value of Farmland to Be Serviced or Converted (Scale of 0 - 100 Points)*	84.6			
PART VI *(To be completed by Federal Agency) Corridor Assessment Criteria (These criteria are explained in 7 CFR 658.5(c))*	Maximum Points			
1. Area in Nonurban Use	15	0		
2. Perimeter in Nonurban Use	10	2		
3. Percent Of Corridor Being Farmed	20	20		
4. Protection Provided By State And Local Government	20	0		
5. Size of Present Farm Unit Compared To Average	10	10		
6. Creation Of Nonfarmable Farmland	25	13		
7. Availablility Of Farm Support Services	5	5		
8. On-Farm Investments	20	10		
9. Effects Of Conversion On Farm Support Services	25	1		
10. Compatibility With Existing Agricultural Use	10	8		
TOTAL CORRIDOR ASSESSMENT POINTS	160	69	0	0	0
PART VII *(To be completed by Federal Agency)*				
Relative Value Of Farmland (From Part V)	100	84.6		
Total Corridor Assessment (From Part VI above or a local site assessment)	160	69	0	0	0
TOTAL POINTS *(Total of above 2 lines)*	260	153.6	0	0	0

1. Corridor Selected:	2. Total Acres of Farmlands to be Converted by Project:	3. Date Of Selection:	4. Was A Local Site Assessment Used?
			YES [ ] NO [ ]

5. Reason For Selection:

Signature of Person Completing this Part: [signature] DATE: 4/3/06

NOTE: Complete a form for each segment with more than one Alternate Corridor


SR 167 - Puyallup to SR 509 Tier II FEIS
Figure 3.12 - 1
Actively Farmed Land
in the Study Area in 2001
Washington State
Department of Transportation
KING CO
PIERCE CO
PROPOSED SR 167
Hylebos Creek
Lower Wapato Creek
Clear Creek
Puyallup River
LEGEND
FARM LAND
COMPOSITE PROJECT FOOTPRINT
0 1000 2000 3000
SCALE IN FEET
N

The soil in the project area is suitable for a wide range of cultivated crops and is favorable for growing row crops. Rhubarb, lettuce (bibb, romaine and red leaf), sweet corn, cucumbers, green beans and strawberries are the most commonly grown crops in this area. Depending on climatic conditions, farmers in this area are able to farm and harvest two full crops and sometimes three during each annual growing season. These crops are sold locally as well as through wholesalers to supermarket outlets throughout the region and state.

The Washington Lettuce and Vegetable Company is a produce wholesaler and distributor located within the proposed project area. It provides support services for local farmers such as cooling, holding, selling, delivering, packing, and repacking produce for local farmers; handling orders for grocery chain stores; and handling rejected shipment and deliveries. The services that the company provides are used to varying degrees by the different farmers in the valley. The company's vacuum-cooling operation for lettuce is the most heavily used service (Dill 2001).

Local area farmers are finding it increasingly difficult to raise crops profitably in a growing urban area where property taxes on the land, now located within the city limits, have risen dramatically. Some farm families have voluntarily participated in municipal service improvements to their property to protect their property values. The encroachment of commercial development, high property assessments, and the financial challenges facing family farm operations has brought into question the longevity of existing agricultural operations. The value of agricultural products sold went down while the value of farmland went up from $4,756 per acre to $7,273 per acre (News Tribune 2001). Some farmers see their only profit in selling their land to developers. Approximately 421 acres currently under cultivation within the immediate project area are either for sale or undergoing negotiations with developers for sale (WSDOT 2004).

Between 1992 and 1997, Pierce County lost 70 full time farms, or almost 8,000 acres of farmland (1997 U.S. Department of Agriculture census). In the past 5 to 10 years, the number of farmers actively farming in the study area has declined from 10 to 15, to five or six farmers. The valley lost another farmer to retirement from farming following the 2001 season (WSDOT 2004).

The majority of the land that is currently being farmed within the study area is being leased from property owners. Most leases are short-term leases, though owners work with the same farmers most of the time. Property owners include local owners, development corporations, and even WSDOT, which is leasing 32 acres previously owned by the Washington State University Extension Service.

3.12.3 Direct Impacts

The impacts of construction and operation are considered together in this section. The conversion of farmland at the time of construction and the temporary disruption to farming during construction are the most substantial impacts. The operation of the freeway will have few additional impacts on farming although its cumulative impact along with other actions may expedite conversion (Section 3.12.4).

No Build Alternative

The No Build Alternative assumes that the proposed project would not be constructed and that no ROW acquisition would be acquired. Therefore, no direct impacts to farmlands are expected. However, the conversion of farmland to non-agricultural uses would continue due to the current zoning and development pressures. As the cities of Fife and Puyallup implement their Comprehensive Plans, eventually all land currently farmed within the study area is expected to be converted. The cities of Fife and Puyallup would also continue to make capital improvements to roads, utilities, schools, and other facilities that would increase the pressure on the remaining farmlands.

WSDOT would also continue to make improvements to I-5, SR 509, SR 99, SR 161, and SR 167 should the project not be constructed. These improvements could include adding capacity, building High Occupancy Vehicle lanes, constructing park and ride lots, and improving intersections. All of these activities have the potential of expediting the conversion of farmland to other uses because they improve the transportation system and support investments in high intensity land uses like manufacturing.

Build Alternative – Temporary Impacts

Temporary impacts on existing farmland during construction could include increased noise, dust, traffic detours, and traffic congestion. Other impacts as a result of construction would include disruption of access to parcels being farmed and traffic delays. Farmers access their farms and move farm equipment to and from their sites by way of local streets. It is anticipated that the restriction of travel lanes in work zones, possible road closures and rerouting of traffic onto secondary roads could impact farming operations. Construction in the immediate vicinity of farmlands would produce increased noise, dust and/or air pollution, but is anticipated to have negligible effect on agricultural activities.

Build Alternative – Permanent

Table 3.12-2 shows the acreages of impacts on lands actively farmed. The table does not separate the mainline from the intersection acres of impact. However, the bulk of the impacts are from the mainline as can be seen in Figure 3.12-1. Indirect impacts refer to parcels that are bisected by the proposed project mainline and interchanges or the riparian restoration proposal where the remaining sections are either impractical or uneconomical to farm. Depending on the final design and the intersection options selected, approximately 148 to 182 acres of land that could be, or is being farmed, would be converted to transportation-related uses (including a park and ride lot located at Valley Avenue).

Table 3.12-2: Impacted Farmland (acres)

Right-of-Way	Direct	Indirect	Total
Mainline and I-5 Interchange*	121	14.5	135.5
Preferred Valley Avenue	34	12.2	46.2
Valley Avenue Realignment	11	1.8	12.8
Freeman Road	22	1.8	23.8
Subtotal			**148.3-181.7**
Riparian Restoration	**Direct**	**Indirect**	**Total**
Mainline and I-5 Interchange	43.7	16.2	59.9
Preferred Valley Avenue	21.2	9.4	30.6
Valley Avenue Realignment	35.4	6.1	41.5
Freeman Road	37.6	17.7	55.3
Grand Total			**238.8-296.9**

*Includes impacts due to proposed weigh stations and park-and-ride lots.

Table 3.12-2 also indicates that riparian restoration will involve additional conversion of approximately 91-115 acres of farmland. The total impact to farmlands from the mainline, intersection options, stormwater facilities, riparian restoration and realignment of Hylebos could range from 239 to 297 acres. Mitigation of unavoidable impacts to wetlands, many of which were previously converted to farming, will convert as much as 100 acres of farmland into wetlands (Section 3.3.5).

The activities of six different farmers will be affected by the proposed project alignment. The alignment bisects parcels that are part of a leased farming operation located near the SR 161/SR 167 intersection. This causes a physical separation that could lead to difficulties in transporting equipment between parcels. Two different landowners, one of which is a development company, own the land currently being leased by one farmer. The land currently being farmed is the site of two approved commercial developments.

Two parcels between Freeman Road and Valley Avenue will be bisected by the alignment. These parcels are being leased and farmed by a local farmer. Since the alignment is on structure along this section of the proposed project, the roadway would not necessarily create a barrier effect between any separated lands. Being on structure would permit equipment to traverse under the structure and allow continued access to land on either side of the roadway. The Puyallup Tribe of Indians recently purchased this property.

North of Valley Avenue two parcels belonging to WSDOT (32 acres) will be bisected by the alignment. The site is being leased to a local farmer to farm. Due to the ROW required for the construction of travel lanes and interchange ramps, it is anticipated the remaining portions of the bisected parcels would be impractical or uneconomical for further farming. A local farm in the vicinity of 20th Street East, consisting of partially owned and partially leased acreage (45 acres total) will also be impacted by the alignment bisecting farm parcels. This farm will be impacted as a result of the riparian restoration proposal.

Washington Lettuce and Vegetable Company will be displaced by one of the park and ride lots. The company's facilities are used to varying degrees by the

different farmers in the valley, particularly for the vacuum-cooling operation for lettuce. However, the loss of this business would not necessarily lead to the termination of farming operations in the valley. Other farm support services are available within the region for farmers to utilize.

Valley Avenue Interchange Options

Based on the results of field surveys, there are no actively farmed parcels in the impact area at either the 54th Avenue East partial interchange or the SR 161/SR 167 interchange (Figure 3.12-1). However, there are parcels whose use is labeled agricultural in the Pierce County Assessor's database.

The farmland acreage in Table 3.12-2 differs from the agricultural land acreage in the ROW acquisition table in section 3.11. The agricultural land acreage in Table 3.11-1 and Table 3.11-2 came from the Tax Assessor's database and includes lands that are not actively being farmed. The agricultural land may already be converted but its label in the database may not have been updated. The farmland acreage in Table 3.12-2 came from field surveys of actual conditions.

The total farmland impacts of the alignment and riparian restoration at the Valley Avenue interchange would be approximately 50 percent greater for the Preferred Valley Avenue and Freeman Road options (76.8 and 79.1 acres, respectively) than for the Valley Avenue Realignment option (54.3 acres, Table 3.12-2).

The different proposed options for the Valley Avenue interchange would impact the farming activities of one local farmer along Freeman Road (106 acres). The impact on the farm would vary between the different options. Under the Freeman Road and Preferred Valley Avenue options, along with associated riparian restoration impacts, the farming activity would lose the ability to access approximately 10 acres of land. This would not displace farming activities, but would reduce the amount of land available to be farmed.

3.12.4 Indirect Impacts

The geographic boundary considered when addressing indirect impact for the project includes the area up to a quarter mile from the ROW boundaries of the intersection options.

In addition to the direct loss of farmland through ROW acquisition, construction of a highway through parcels could indirectly affect the viability of some parcels for agricultural use. Indirect impacts refer to parcels that are bisected by the proposed project mainline and interchanges as well as the riparian restoration proposal where the remaining sections of the parcel are either impractical or uneconomical to farm. The amount of farmland that would be indirectly affected would be dependent on the final design as well as the Valley Avenue interchange option selected. Problems associated with equipment access and size of the leftover parcels may make farming on one or both of the remaining sections of the bisected parcels impractical or uneconomical.

Depending on the Valley Interchange option selected approximately 39 to 61 acres would indirectly impact farmland within the project area. Sixteen to twenty-seven acres would be indirectly impacted due to alignment ROW requirements for the proposed freeway and 22 to 34 acres indirect impacts by riparian restoration requirements.

The proposed alignment would also impinge into the edge of other farmland parcels resulting in possible disruptions, but would not be expected to lead to further fragmentation of farming activities. For possible mitigation measures refer to Section 3.12.6 of this report.

3.12.5 Cumulative Impacts

The geographic boundary for the project area includes all of Pierce County. The temporal boundary extends back to 1992 and forward to 2030. The temporal analysis was limited by available information.

Farmlands in Pierce County have decreased about 13 percent in the 1992 to 1997 time period, mostly because of urban development throughout the county as it continues to grow in population. Under the Build alternative it is expected to contribute to that trend with the long-term conversion of farmland for transportation related use as well as wetland restoration and mitigation. All of the land being farmed within the project area is occurring within urbanized areas. The majority of which is in the city of Fife city limits. Both the cities of Fife and Puyallup have determined that the highest and best use of the property located within the project area is commercial or industrial use and has zoned the land as such.

Since the beginning of the study much of the land that has been identified for the highway alignment has been on the market for sale or has already been sold for development purposes. Within the project area most of the land being farmed has been either under negotiations with or sold to developers or other parties, including the City of Fife. Even under the No-Build alternative it is expected that the impacted farmland would convert to long-term commercial/industrial uses.

There is not quantitative data that details how this loss of farmland in the SR167 corridor will impact the economy, produce availability, farm workers, and residents within the local region. However, farmers that operate within the corridor were interviewed regarding local impacts if their farms went out of business. They stated that there could possibly be impacts to the wholesalers and produce stands that purchase their produce, but that other produce would be brought in from other areas. None of the local farmers interviewed grow organic produce. Two farmers stated that their produce is unique, with rhubarb being the only specific crop identified as unique. One of these two farmers stated that there wouldn't be the same crops available in the area if he went out of business. The other farmer that has unique produce stated that the same crops he presently grows would still be available at other farmers markets in the region.

All of the farmers interviewed stated that the crops that they produce could be purchased elsewhere. Some of purchasers of the local farm produce are wholesale houses, major grocers, and produce stands. These consumers could replace the loss of local crops with produce grown in Orting, Auburn, the Skagit Valley, the Willamette Valley, and California.

The loss of farmland in the Puyallup River Valley represents a shift in historic use of the area. However, many of the farms are currently in operation are leased facilities rather than family farms and it is difficult to assess the impact of the change in the Puyallup River Valley on current and future residents. The farmland in the study area, specifically in the city of Fife, has a relatively higher value which means that it requires minimal land management to make the land farmable. It also does not require irrigation systems to produce crops but they are used because of the double and triple cropping to produce truck farm crops. Some families have farmed the area for three generations. However, interviews with farmers in the area make it clear that most are leaving the area due to increased urbanization and property values that are making farming unprofitable. One farmer stated that he believed most, if not all, of the farms in the area would be gone by the time the highway is built.

A few of the farmers interviewed identified California as the primary competitor for their products. One noted that the year round marketing in California makes it difficult to compete with them.

Cumulative impacts on farmlands are expected to be substantial. This is a result of the urban designation of the area, the increasing land values that make farming less profitable, and lack of farmland protection policies.

3.12.6 Mitigating Measures

Consultation and coordination with affected farmers will be conducted to ensure that disruptions to farming are minimized and adequate advanced notice of potential disruptions is given.

Erosion control measures will be implemented during construction. Construction zones along the roadway will be replanted after construction in accordance with local and state guidelines. Planned water detention facilities will assist in protecting farms from the runoff from roadways. The use of water trucks and other construction best management practices will be used in the control of dust. As part of construction management, access and traffic mitigation and dust control measures will be prepared and included in the project's contract specifications.

Once design is complete, WSDOT will work individually with farmers to identify circulation options for movement of farm equipment and to provide access to fragmented acreage. Generally, the small size of the fragmented land (10 to 15 acres) negates the use of farm sheds to store separate farm equipment. The incursion of development and acquisition of land by developers within the area does not make the option of swapping land a satisfactory option to preserve sufficient acreage to allow farming on either side of the proposed alignment.

FHWA and WSDOT will try to provide access from local streets by way of access roads and/or easements. For farms located in the vicinity of 20th Street East, an easement and corridor could be provided through WSDOT ROW in the vicinity of the proposed 20th Street East and 70th Avenue East roundabouts to allow movement of farm equipment underneath the SR 167 structure where it transitions from ground level.

Just east of the Puyallup Recreation Center, a developer is proposing to build a crossing over the SR 167 mainline. The crossing would connect Valley Avenue to North Levee Road. This crossing would accommodate the size and type of tractors used in these fields. Providing access to the crossroad from the fields would allow for the continued farming of acreage on either side of the roadway. If this crossing is not built at the time of construction, FHWA and WSDOT would determine the alternative mitigation at the design stage.

For farming operations on leased land, mitigation would be predicated on the options available to the landowners and their intentions for further utilization of their land. Currently two of the larger farm operations are occurring on leased land, both of which are undergoing sale negotiations with developers. It is anticipated that future use of the property would change prior to acquisition of property for the project.

The future of farming is uncertain within the study area of the Fife/Puyallup Valley; property has been rezoned for higher intensity land uses and property assessments have risen dramatically. As noted earlier, 421 acres of the land that is being farmed within the proposed project alignment is currently on the market for sale or owners are in negotiation with commercial developers. Any mitigation that addresses the issue of farmland would depend on the land use at the time of acquisition and construction.

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