

October 19, 2015

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Clark County Community Planning
Attn: Rural Industrial Land Bank
PO Box 9810
Vancouver, Washington 98666-9810

OCT 19 2015



Dear Sirs and Madams:

Subject: Comments on the Clark County Rural Industrial Land Bank Programmatic Environmental Review pursuant to RCW36.70A(2) (b), and Addendum to the Clark County Management Plan Final Environ Imapt Statement May 4, 2007 (October 2015)

Thank you for the opportunity to comment.

QUALIFICATIONS OF COMMENTER. I live and farm in close proximity to the Lagler Dairy and proposed Rural Industrial Land Bank. Perhaps, more importantly I have made it my life's work to contribute to creating a more socially, economically and environmentally sustainable agricultural system in this country and this county. I have extensive academic and professional experience in agricultural policy, as well as practical experience working on farms across the state and region. I have been observing the subject area of the "docket site" for the last twenty years.

SUMMARY OF COMMENTS. The analysis provided by Berk in the Addendum is flawed and inadequate. Direct observation reveals that medium to large size farms are thriving and expanding in and around the subject area of the docket site. The consolidation of the local dairy industry into a few large dairies suggests that careful assessment of the consequences of losing an additional dairy and more dairy land should be conducted before de-designating the docket site.

The docket site is key to maintaining a number of economic, social and environmental values that the wider subject area, and surrounding rural lands provide. De-designation of this property will have far reaching consequences. These consequences and alternative policies should be considered.

INADEQUACY OF BERK ANALYSIS. Based on my experience and expertise in agriculture, I find the designation analysis of the docket site woefully inadequate. Perhaps the most flagrant error is the mis-identification of cane berry (raspberry, blackberry, etc.) acreage in the vicinity, as "cranberries". While this example might seem minor, it is diagnostic of the hazards of hiring contract analysts from a distant city, who relied on remote satellite imagery and the outdated published work of others, to compile their data. The direct knowledge that could have been gained from local sources is glaringly absent.

Berk sites a previous study that identifies 3 farms (of commercial significance) in the subject area. This number is likely out of date, inaccurate and low. Including Chapman's Nursery, Lavender Accent and Lagler Dairy, three such farms have frontage on SR 503. But for the sake of argument, we could assume the three farms cited are Lagler Dairy, Silver Star Farms and Bi-Zi Farms. Removal of the Lagler Dairy will cut Bi-Zi farms off from the larger fabric of Ag Resource lands in the area. This isolation will likely intensify pressure for Bi-Zi to cease operation and be absorbed into the Urban Growth Boundary.

TREND ANALYSIS. In the past some of this development pressure has come from County

Government itself. As long as county government continues to approve and appear to encourage de-designation of agricultural resource lands, that expectation will be built into the market price of these lands, pricing them out of the agricultural production market.

Berk cites a variety of reasons for a trend of increasing numbers of small farms and decreasing number of large farms. However, it does not adequately address the degree to which development pressure and government policy may be affecting or driving the trend.

It would be incorrect to conclude from the juxtaposition of these trends in the document, that small farms are replacing large farms. They occupy different market niches and different land use zones. If anything, the small farms have strengthened the larger farms by identifying markets for fresh local products that they cannot by themselves serve.

One possible explanation is that government policy and development pressure are the common factor between the two trends. The expectation of land use policy changes prices beginning farmers out of the market for larger Agricultural Resource parcels, decreasing the demand for farmland as farmland. Retiring farmers experience the lack of demand and pursue re-zones, continuing a vicious cycle. A consistent land use policy could break the cycle and protect farmland, as the Growth Management Act intends.

LAND USE PATTERN. Berk's failure to utilize direct local knowledge, and the choice to include only a contiguous pattern of Agriculture Resource lands, leads them to false conclusions about the pattern of agricultural use and the commercial significance of agriculture in the subject area of the docket site.

Silver Star Farms operates on numerous small to mid-sized parcels across the subject area and beyond. A common complaint of the Laglers and other farmers is the harassment they experience when moving equipment along local roads between parcels they are farming. As a neighbor to Silver Star's home site, I witness constant traffic of equipment leaving that site for other parcels. Siting an industrial facility that may greatly increase road and rail traffic would seriously impede their operation. Silver Star is mainly a cane berry and strawberry operation. Its farming of numerous parcels across the area suggest that there is a great deal of interdependence between the various parcels they own and lease, contrary to Berk's analysis of no known interdependence. I believe Bi-Zi also grows some berries, and it is likely that cooperation takes place between these farms in terms of equipment use, and supply purchasing.

I can also attest to cooperation between Silver Star and Lagler in the areas of equipment sharing, custom farming and emergency assistance.

ECONOMIC ASSESSMENT NEEDED. The justification for de-designation of the Lagler Dairy is creation of jobs. While we commend the landowner's vision of a high tech facility, warehouses and distribution centers are a more likely outcome.

An assessment should be done comparing the quality and quantity of jobs created by such facilities, to the jobs lost if these farms disappear. Between them, Lagler, Bi-Zi and Silver Star, probably employ around 40 people full time, plus considerable part-time and seasonal labor. A younger generation is active on all three farms and could be expected to continue the operations.

As well as assessing current employment, it should be recognized that the Lagler, Silver Star and Bi-Zi owners have been farming and employing others for from 50 to 100 years, and could go on doing so for

an equal time into the future, whereas industrial developments such as Hewlett-Packard have come and left the area over the course of a few decades, leaving empty buildings behind

In addition to direct employment, the employment created for suppliers to the farms and processors of the farms' products should be evaluated

ALTERNATIVES SHOULD BE CONSIDERED Before taking the irrevocable step of de-designating prime agricultural soils, a consideration of possible alternatives to the present situation should be considered. The Lagler/Ackerlands have expressed concern that they may not be able to remain competitive into the future. In addition they feel harassed by the encroaching population and have difficulty working around and across the highway that bisects their operation.

ALTERNATIVE I FACILITATE A MORE WELCOMING ENVIRONMENT FOR OUR LOCAL FARMERS Public education could be done to make the public aware of the rights of farmers, and the essential role they play in providing food, open space and habitat for wildlife. Motorists could be educated about how to safely and courteously navigate around farmers moving equipment on the roads.

Ways of mitigating the impacts of the State Highway could be funded by State and/or local government. At a minimum, a pipe hole could be drilled under the highway allowing manure slurry to be pumped to the Ackerland property, nearly doubling the area available for manure management.

More ambitiously an underpass could be built that would ease transfer of equipment and livestock under the highway. State government could be lobbied to provide grants to dairies to help meet more restrictive manure management regulations. Perhaps such improvements would allow the Laglers to remain competitive, meet the coming stricter regulations on manure management and continue to produce milk and provide other values to the community.

ALTERNATIVE II FACILITATE TRANSFER OF THE PROPERTY TO A DAIRY PLANNING TO CONTINUE OPERATION The transition process in the industry is not only one of dairies leaving the area, but also of remaining dairies increasing size to remain competitive. If the Laglers are resolute in leaving the area, the community should consider the possibility of using the land to assure continued production of one of our most basic foods.

ALTERNATIVE III ENCOURAGE THE LAGLER/ACKERLANDS TO SELL THEIR LAND FOR OTHER KINDS OF AGRICULTURAL PRODUCTION If, in fact, industrial dairy production is not suited for operation on the urban fringe, it is not necessarily true that other forms of agriculture could not utilize the property. It is typically the case that livestock producers occupy lands not suitable for production of more lucrative crops such as berries. This is not the case in this instance. As the soil survey for Clark County put out by the Department of Agriculture Natural Resources Conservation Service indicates, the soils occupied by the Dairy have no limitations for fruit and vegetable production. The utilization of adjacent lands by fruit and vegetable producers provides additional evidence. It is estimated that these operations generate revenues of \$7,000 to \$10,000 per acre, much higher than what growing grass for cows will generate.

Some areas of the dairy are already paved over, and these could be used for agricultural processing facilities or other light industrial uses.

ALTERNATIVE IV Local investors could form a Real Estate Investment Trust (REIT) to purchase lands such as the Lagler/Ackerland properties and lease them to mid-sized and small farms for

commercially significant production. Such REITs already exist particularly leasing land for organic production, but a locally owned REIT with flexible parameters would be preferable. A partnership could be established between the REIT and the 78th Street Farm to create a small to mid-size farm business incubator, to prepare beginning farmers to succeed in utilizing this valuable land resource.

AREA WIDE CONSEQUENCES OF DE-DESIGNATION. I commend the Lagler family for the civic mindedness and long term thinking of their proposal. However, the wider implications of removing the dairy from Agriculture Resource status, in my opinion, outweigh the benefits of industrial jobs and tax revenues.

The remaining large to mid-sized farms will experience increasing pressures of development and traffic congestion. Support services and markets for remaining farming operations throughout the county will be weakened by shrinking demand.

The Lagler/ Ackerland Properties anchor a rural/agricultural district that defines the boundaries of Vancouver and Battle Ground and provides a relief from the experience of endless commercial and residential sprawl. These properties provide the plug in the dam that keeps development from flooding down the banks of Salmon Creek, banks that are characterized by steep canyons of loose soil, poorly suited to residential development.

Some argue that economic prosperity is not achieved by “chasing smokestacks”, but by providing a quality of life that attracts innovative start-ups to locate in your community. A man recently moved in next door to us who is a software engineer who works from home. He and his wife manage a small herd of alpacas and sheep from which she creates and sells fiber art. Our current landscape is surely a factor in their choice to locate here. Need I say more?

Along with the adjacent riparian zone, the open prairie-like environment of the properties' fields and pasture offer a diverse and rich environment for wildlife. Thousands of migratory birds stop to graze the Lagler Dairy grasses. Diverse raptors from kestrels to bald eagles can be seen hunting the open fields. Development will fragment and isolate the few protected wild land parcels, diminishing their habitat value.

Finally, even the commendable suggestions Berk makes for berms and trees to buffer the population from the proposed industries will destroy the expansive panoramic views the Dairy provides to commuters and residents passing through the area.

A WORD ABOUT FOOD SECURITY. The Berk analysis quotes one view of food security expressed by the Clark County Food Systems Council. This view approaches “security” as we think of “social security,” concerned with assuring that vulnerable populations have access to adequate, wholesome and healthy food supplies.

A second view of food security considers the food system from a perspective more related to “homeland security.” Is our food supply safe from various societal and/or natural threats? Can we assure our food will be safe to eat? Can we assure that our food supply won't be interrupted as a result of human conflict or natural calamities?

Fluid milk is a very basic, critical element of our food supply. It is highly perishable and expensive to transport. The Lagler dairy likely produces about a quarter of the milk produced in the county. As we consider the future of our food supply, should we not ask whether the capacity to produce milk to be

consumed locally might not be a high priority?

The Berk study suggests that the Lagler Dairy is not part of the local food system. I don't know about my neighbors, but I buy my Tillamook ice cream, butter, sour cream and yoghurt at the super market within sight of the dairy. It is not even accurate to say that the Laglers sell their milk to a creamery in Tillamook, Oregon and that they sell it back to us. As a member of the Tillamook Dairy Co-op, the Lagler Dairy is the processor, and some of the profits, in addition to the direct milk revenue returns to Clark County to be spent and invested here.

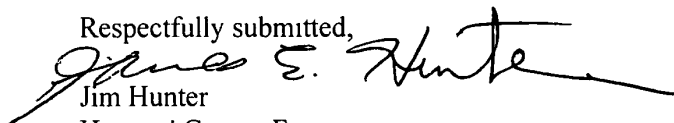
Local is a relative term, and buying cheese from Tillamook made from milk from Brush Prairie adds more to food security, and does more for our community than buying Parmesan from Parma, Italy.

IN CONCLUSION The planners who present this proposal to the public, make much of the fact that this proposal originated with the landowners, despite the fact that the governing regulations specify that, "The intent of a landowner to use land for agriculture or cease such use is not the controlling factor in determining if land is used or capable of being used for agricultural production,"

While I commend the landowners intentions, approving this proposal because he wishes it, creates chaos in the planning process. Many would want to build houses on the land, but the landowner recognizes that jobs are needed to employ the people who live in the houses. But, of course land is also needed to feed the people who have the jobs and live in the houses. The Growth Management Act recognizes this need and requires that the planning process address it.

Between global political unrest and global and regional climate change, there is plenty of uncertainty in relying on distant sources for our food, I urge you to consider this and the other factors in these comments.

Respectfully submitted,



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