

**Schroader, Kathy**



**From:** Wait, Judith Ann <judith.wait@wsu.edu>  
**Sent:** Wednesday, October 21, 2015 8:42 PM  
**To:** Schroader, Kathy  
**Cc:** commplanning@clark.wa.gov, Orjako, Oliver  
**Subject:** Comments Re Rural Industrial Land Bank Environmental Review  
**Attachments:** RILB comments to Clark County Community Planning 21 October 2015.docx

Dear Oliver,

Attached are my comments on the RILB to the County's policy makers and Planning departments. To put it bluntly, I see yet another significant impact from any proposed additional de-designation of agricultural land. And the proposed impacts are not mitigated. So, I "vote" NO, with all due respect for the Lagler Dairy.

I'm curious why you are having an open house after the deadline for public input on the LB?

Thanks for this opportunity to have some input. Is there a place to find responses and replies to public comments on this RILB process or the Comp Plan update? It's hard to figure out if comments are actually considered, and if so, when and how. It's not that I have time to follow. Certainly farmers are already over-busy growing food and such.

Similarly, did the Planning Commission recommendations hearing this week include public comment? It's been a month since the Sept 17 deadline for Comp Plan comments. Did any of those comments carry forward?

Best wishes,

Jude

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**From:** Schroader, Kathy <Kathy.Schroader@clark.wa.gov>  
**Sent:** Wednesday, October 7, 2015 7:07 AM  
**To:** Schroader, Kathy  
**Subject:** Rural Industrial Land Bank Environmental Review

**Rural Industrial Land Bank update:**

An addendum to the 2007 Comprehensive Growth Management Plan Final Environmental Impact Statement in the form of a programmatic environmental review has been prepared regarding the Rural Industrial Land Bank (RILB). This document includes a review of environmental factors for the application site and contains mitigating measures as required in the form of a master plan concept and proposed development regulations.

Both the 2007 Environmental Impact Statement and the addendum can be found at [www.clark.wa.gov/planning/landbank](http://www.clark.wa.gov/planning/landbank)

The public is invited to comment on the addendum. Comments on the addendum are due **October 21, 2015**, and can be made as follows:

- Post a comment online [Engage Clark County](#)
- Send us an email at [commplanning@clark.wa.gov](mailto:commplanning@clark.wa.gov)
- Mail your comments

Clark County Community Planning  
Attn: Rural Industrial Land Bank  
P O Box 9810, Vancouver, WA 98666-9810

Another open house is scheduled for **Thursday, October 29, 2015** at the CASEE Center, 11104 NE 149th Street, Brush Prairie, from 5:30-7:00 p.m. All of the materials required by the Growth Management Act will be available for review and will be discussed.

More information on the Rural Industrial Land Bank project can be found at [www.clark.wa.gov/planning/landbank](http://www.clark.wa.gov/planning/landbank)

Thank you,

This e-mail and related attachments and any response may be subject to public disclosure under state law.

Clark County Community Planning  
Attention Rural Industrial Land Bank—"Comments on the addendum"  
Oliver Orjako, Director

21 October 2015

Congratulations! The arduous, expensive process, and overly redundant documentation of the four potential land bank sites have a higher and better use. Indeed, the Agricultural De-designation Appendix formulates a draft Agricultural Land Bank proposal. Long-term commercially significant agriculture is variously mapped and described. You can improve on the overgeneralizations and comparisons to Census of Agriculture data and outdated analyses of limited scope. The agricultural significance is underplayed, apparently in an effort to justify one landowner's petition to de-designate the site of his active farming operation. The only way to abide by the intent of the GMA to keep the land in agriculture is to keep the land in agriculture, it's that simple. With all due respect to current, past, and future farming operations, de-designation is not justifiable.

We do not need to push forward an RILB, but we do need agricultural zoning. And of course we need to keep maximum parcel sizes, for any significant economic development. The "light industrial" we need to accompany (not replace) agricultural land would be agriculture and food related "industry."

Amazingly, all the sites could represent potential Agricultural Production Districts. There are of course other neighborhoods in Clark County that would be still suited for such districting as well. In such regions, various policy and economic development tools can be used to support the infrastructure and other needs of the agriculture community and its beneficiaries. All residents of the region and all participants in the food system benefit, in the long run, when farmland is conserved, along with critical areas, ecosystem services, and other natural resources. Farmers benefit as well, as the infrastructure and sector capacity is better maintained, adapted, and implemented. It is very heartening that these four areas you have cursorily analyzed have a "majority of land in current use taxation," further documenting their agricultural significance, and current use.

As previously and otherwise recommended, please refer to the 2009 Agricultural Preservation Committee report. Omitting this County (State grant-funded process) report, yet citing others, indicates an avoidance and further abrogation of the County's obligation to support farmers. The County's food system resilience would be greatly enhanced if farmers were supported in overcoming the barriers and challenges, as outlined clearly with recommended solutions in the 2009 report. Food security depends on all of the food system, and is not just pertaining to the emergency food system and direct marketing venues. There are many ways to support farmers other than gerrymandering yet another future development scheme onto prime agricultural land. The UGA expansion has already adversely impacted agriculture in Clark County. Using one of the recommended policy tools, the County could purchase the development rights, for example. Why instead would you de-designate land and push farmers' further exodus to the East, South, or

North due to your unfavorable policies? Farmers both young and old want to stay or start farming here! All sizes of operations are needed, and a diversity of products are indeed feasible to produce here, a fact supported by the numbers and diversity of farming operations. Farmers are using various site class lands as well. Have you asked current farmers about their operations on the different soil types and micro-climates? You did these intensive studies on only four areas, yet you don't seem to know much about the farms that are actually in the areas. Why over-generalize using outdated analyses, satellite imagery? Why repeat the worn out hypothesized "transition" of the agricultural sector? There are always transitions and adaptations in the farming sector.

RE "Determination of Significance and Adoption of Existing Environmental Document

Linking the proposed de-designation of agricultural land of long term commercial significance to the 2007 Clark County Comprehensive Plan and EIS is further evidence of the need to consider any such de-designation proposals within the 2016 Comp Plan update process. Previous and other comments address this issue. What does it mean "not applicable" when indeed the UGA expansion in the 2007 Comp Plan was challenged, and agricultural lands were removed from the UGA as proposed in 2007, due to a legal challenge. The County lost its case!

RE Agricultural De-designation Appendix

Furthermore, in the Agricultural De-designation Appendix, reference to the 2007 Analysis and Comprehensive Plan Update further indicate that this proposal should indeed be part of a COMPREHENSIVE analysis and environmental impact statement. The County has heard this comment before and elsewhere.

Thank you for beginning of a study for an agricultural "land bank." Surely an update on the farming situation in Clark County is needed. We are post-great recession, and post-court settlement to re-designate AG land under the GMA. It's really inadequate science (and policy) to be perpetuating the limitations of the 2007 study and EIS. You could instead remedy the lack of current and comprehensive data.

Thank you for developing a justification for an agricultural production zone for the agricultural and rural lands in the area wide study. This is indeed some of the most valuable farmland in the County, as it is relatively large enough for a commercially viable mid-size farm! The infrastructure is there, there are a diversity of farms, and operations in the areas include leased and owned farmland. The GMA specifies keeping enough infrastructure to ensure viable agricultural commerce. The "transition" indicates the need for support. Yes, the "urban-oriented" farm sector is growing, but no further loss is justified. Indeed, we need to protect and enhance what is left!! Supportive systems need to be reinforced and adapted to current situation.

The County (and State) need to address the water situation! If water is a limitation for agriculture, then surely water is a limitation for the already sprawling residential development.

and further proposed conversions to “industrial ” Many types of agriculture use much less water per acre than residences Farmland requires less from County services, thereby costing the County less per acre to service Did you factor this in to the market value as a land use planner should?

The food system is a regional affair, including northern Oregon and southern Washington Food security should be viewed on a regional basis This RILB process is another opportunity for the County to begin designated support for agricultural land of commercial significance

When are you going to consult with all the people and organizations listed?

Thanks for your time and consideration for supporting farming and farmland preservation in Clark County Such efforts are sadly way past due Do you know any farmers who feel supported by Clark County? The sector is still viable, and the land is still available and being farmed Please do not de-designate farmland or potential farmland There are many farmers looking for more land to farm, whether they are younger operations or multi-generational businesses Let’s make them all feel welcome and supported

Respectfully submitted,

Jude Wait,  
Food farm resilience researcher

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More information on the Rural Industrial Land Bank project can be found at [www.clark.wa.gov/planning/landbank](http://www.clark.wa.gov/planning/landbank)

Thank you,

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