

From: [Jeffrey Delapena](#)
To: [Jude Wait](#); [Jeffrey Delapena](#)
Cc: [Jude Wait](#); [Jenna Kay](#); [Oliver Orjiako](#); [Cnty 2025 Comp Plan](#); [Sue](#); [Patricia Haggerty](#); [Ben Duncan](#); [Amy Koski](#); [Lauren Henricksen](#); [Jose Alvarez](#)
Subject: RE: Farm & Food Justice -- Comments on Scope of Environmental Impact Statement (EIS)
Date: Wednesday, June 5, 2024 4:36:41 PM

Good day, Jude,

Thank you for your comments. These will be added to the Index of Record.

From: Jude Wait <wellsavellc@gmail.com>
Sent: Wednesday, June 5, 2024 4:30 PM
To: Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Cc: Jude Wait <waitjude@gmail.com>; Jenna Kay <Jenna.Kay@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>; Sue <suemarshall5@hotmail.com>; Patricia Haggerty <farmfoodjustice@gmail.com>; Ben Duncan <bDuncan@kearnswest.com>; Amy Koski <Amy.Koski@clark.wa.gov>; Lauren Henricksen <Lauren.Henricksen@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>
Subject: Farm & Food Justice -- Comments on Scope of Environmental Impact Statement (EIS)

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Dear Clark County,

Attached AND HEREIN are comments from the Farm and Food Justice network co-leaders. I wrote to our farm network lists, the following, which are issues to consider in every element... What's the impact on food and farming ??

You know first hand the risks to farming, and the lack of any support from the County to mitigate

1. excessive sprawling growth,
2. protect water supply and water quality,
3. protect biodiversity including pollinator dispersal and beneficial species.
4. There's no Ag commission, no support of the Conservation District, barely any support for Extension,
5. no policies to protect existing farms in or near the Cities.
6. There's no Area Wide Ag assessment, which should be required by the Growth Management Act.

7. AG PRODUCTION DISTRICTS !!

The Comp Plan should establish supports AND be evaluated against the impact on farming...

So, any Alternative that fails to protect natural resources and agriculture, especially food production, should be rejected or modified.

You can see the issues the County identified. Let's get more specific re their list. **HOW do these issues affect FARMERS, farms, food production, food security... :**

- Soils. erosion YES GREAT IMPACTS FROM DEVELOPMENT. NO SURFACES THAT ARE DEVELOPED ARE INFILTRATION ZONES BECAUSE DEVELOPERS SCRAPE THE SOIL AWAY DOWN TO HARDPAN OR BEDROCK. LAWNS ARE IMPERVIOUS.
- climate CHAOS DISRUPTING PRODUCTION
- water supplies and quality WATER FOR IRRIGATION
- habitat BIODIVERSITY, POLLINATOR, MIGRATORY BIRDS, FOOD CHAIN
- energy FOR PRODUCTION, TRANSPORTATION, ON-FARM CONSERVATION
- environmental health (air quality, etc AFFECT ON CROPS AND PEOPLE
- Land use: agriculture crops... FARM LAND PROTECTION
- transportation (farm goods and services, people to/from markets
- Public services: water waste, education, ... FOOD WASTE REDUCTION

**So sorry to be last minute and urgent. WE thought we had time to get your input, and our collective input into the Comp Plan (we still do...) via our representation as the Farm and Food Justice Network on the County's Environmental Justice Coalition, to address Climate resilience and social justice ... BUT they failed to alert us to the EIS input deadline... [[we would have built Scoping into our Work Plan already]]

We trust that Friends of Clark County and others are more policy astute than I, and have extensive comments submitted. But we probably need MORE... to have more standing. Thanks to FOCC and Futurewise, Climate Resilience and Environmental Justice are now required Elements of the Comprehensive Growth Management Plan. The state is funding the Climate Elements and the public engagement (the EJC and a Climate Advisory Group). BUT how all the public input gets into the EIS issue list is this separate comment process!

PLEASE, DEAR COUNTY, keeping the EJC, CAG, agency advisory, separate from each other, and from the overall Comp Plan and separate further from the EIS scoping is a

disservice to the current and future residents of Clark County.

respectfully submitted,

Jude Wait, co-organizer of the Farm and Food Justice Network

Comments to County Plan EIS, from Wellsave, LLC, as an individual, and Dillish Farm LLC, both participants in FFJN and the EJC¹

The County should assess Comp Plan alternatives compared to

The mission of the Farm & Food Justice Network, which is to enhance the capacity of farms and food enterprises to be climate resilient.

You should also prioritize farmers supporting farmers networking to gain equitable access to resources and support.

Evaluate: Does the Comp plan advance Our vision for locally grown food in Clark County to reach vulnerable families in our communities.??

County support for the Farming sector is sorely lacking and must be remedied.

The farming sector is highly vulnerable to climate change. We are on the front line of greenhouse gas emission pollution, flooding, extreme heat, and wildfire smoke. Farmers, farms, and farmworkers suffer disproportionately. We have seen extreme conditions ruin crops, without adequate access to disaster relief.

As indicated in EJC Application #8, members of our Farm & Food Justice Network include BIPOC, Culturally specific groups, farm operators, farm workers, farm owners, low income, minority food businesses, and others in both rural, interface and urban neighborhoods of Clark County. Many of our farm members directly serve food insecure community members in Clark County.

FUND the participants:

As you know, volunteering and serving on committees is a privilege most farmers and other community based organizations cannot afford. Engaging in policy is very much beyond the capacity of most farmers who are busy growing food. Very few have accessed government support for anything. While we are convening for input to policy, we will share information and help the most vulnerable farmers access resources. Farmers and farm workers are otherwise largely excluded from policy arenas for various reasons partly related to systemic injustice. Farmer-to-farmer networks are essential for the resilience of the farm and food sectors. Community food security is essentially an environmental and climate justice issue.

The County should fund and support an Ag Commission co-led by the Farm and Food Justice Network, as we have the organizational qualifications, mission capacity, willingness, and technical ability to facilitate public engagement, gather and analyze data, share findings, and network with others across the diversity of the EJ Coalition the County is supporting.

We are growing food in our community for our community and supporting economic prosperity.

We already know how to engage with farmers, farmworkers, food insecure, and support network entities. In person meetings (Best reached in person during winter months.), surveys, emails and phone calls, focus groups, incentivises programs to outreach and gather data resources, access to tools for logging data and tracking climate conditions and changes.

The County Ag support should enable solutions to several problems:

¹ We did not know we should be soliciting our Network members to have their input, even though we have Work Plans under the County Environmental Justice Coalition. County people didn't bother to tell us~

- Access to technology about climate-related impacts directly towards the farming community to better help protect the land spaces.
- Input about climate related impacts on farms.
- Preparation, adaptation, mitigation.
- Farm level waste reduction.
- Support structure for climate emergency impact preparation.
- Livestock safety plans caused by increases in fires.
- Mitigation support structures needed.
- Better preparation for smoke impacts.
- Reporting and sharing in person changes in land management practices to build more long term resilience to climate disasters.
- Small farms are impacted at a higher rate of vulnerability with multiple crops with different growing conditions with higher rainfalls each year farmers face heavy issues

The Farm and Food Justice Network's current capacity includes a co-leadership team of the most vulnerable farmers and a farm support navigator. Our Farm and Food Justice Network members will continue to participate in other venues, networks, and organizations that include farmers. However, we need a more united network of farmers. Farmers will continue to meet regularly as a group (monthly or more frequently). We also network through sub-networks and markets we share. We exchange information via an email listserve. Farmers are well networked with support and service provider organizations, but these organizations are not adequately nor equitably serving our needs.

ADDITIONAL MEMBERS OF THE COMMUNITY FARM COMMISSION:

For examples: the Clark County Food System Council, the Clark Conservation District, Fourth Plain Forward, food box distribution sites, community gardens, Earth Day, the County Fair, Farmers Markets, the Clark County Food Bank, the Heritage Farm, the Farm-to-School network, Clark County Public Health, Clark County WSU Extension. We also plan to engage with the new Northwest Rocky Mountain (NWRM) Regional Food Business Center (RFBC) (via Wellsave, LLC). The RFBC is specifically focused on supporting the underserved and historically underrepresented farm and food business to become more viable and resilient.

We look forward to ongoing Farm and Food Justice network representation in the Environmental Justice Coalition. Farming, Food, and Agriculture need to be added to the Environmental Justice list of cross cutting issues.

Farming and food sectors intersect with transportation, land use (farmland is disappearing!), health disparities, resource lands (limited water, fertile soil, and food production sites), and certainly labor! We will help to facilitate meaningful input from Farm and Food sector communities, and provide mutual support for the food security networks such that healthy local food is accessible to vulnerable communities. We necessarily add farmers and farm workers as a highly vulnerable sector. We are the only group that is of, by, for farmers, and our leadership includes the most vulnerable and marginalized.