

**From:** [Friends of Clark County](#)  
**To:** [Jose Alvarez](#); [Bart Catching](#); [Oliver Oriako](#); [Jeffrey Delapena](#)  
**Cc:** [David McDonald](#); [annfoster5093@gmail.com](mailto:annfoster5093@gmail.com); [jmlane@msn.com](mailto:jmlane@msn.com)  
**Subject:** Planning Commission Work Session on DEIS  
**Date:** Thursday, October 3, 2024 4:20:33 PM  
**Attachments:** [FOCCCCPC-DEIS-Ltr-241003.pdf](#)

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Please see Friends of Clark County letter, attached.

Thank you,

Ann Foster  
President, Friends of Clark County



# Friends of Clark County

PLANTING THE SEEDS OF RESPONSIBLE GROWTH

October 3, 2024

Clark County Planning Commission  
% Community Planning  
Jose Alvarez and Bart Catching  
Comp Plan Comments  
P.O. Box 9810  
Vancouver WA 98666

RE: Planning Commission Work Session on DEIS

Dear Reader:

My name is Ann Foster. I am President of the Friends of Clark County<sup>1</sup> (FOCC) Board of Directors. I am writing on behalf of the organization and our individual members to give just brief initial comments regarding the work session scheduled this evening on the Draft Environmental Impact statement for the County's Comprehensive Plan. FOCC intends to provide a more detailed and specific set of comments prior to the full hearing before the Planning Commission.

First, FOCC joins in the comments submitted by Futurewise on October 1, 2024.

Second, FOCC wants to emphasize that the County should set a goal where the Alternatives presented provide for expansion, not loss, of designated Agricultural Lands. Recently the Washington Supreme Court emphasized that the GMA requires counties to designate and protect agricultural lands:

*In King County*, we noted that the GMA requires counties to “designate agricultural lands of long-term commercial significance,” to “assure the conservation of agricultural lands and to assure that the use of adjacent lands does not interfere with their

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<sup>1</sup> FOCC is a 501(c)(3) Washington State non-profit corporation that works collaboratively with community partners and policy makers to keep Clark County a beautiful and healthy place to live, work, and play. FOCC works collaboratively with community partners to improve the quality of life and economic viability of our community, for all citizens of Clark County. FOCC supports smart growth that allows for economic development in balance with protecting the area's precious resources and community assets. Many members and supporters of FOCC are landowners and residents of Clark County. FOCC Board members, staff, supporters and regular members regularly participate in the many public processes by writing emails, letters, and providing testimony at public hearings concerning many land use and quality of life issues. FOCC has participated in each phase of the Comprehensive Plan update both with individual members and as an organization. We previously submitted comments on the scoping of the EIS and incorporate those comments in this letter for the record.

continued use for the production of food or agricultural products,” and to “conserve agricultural land in order to maintain and enhance the agricultural industry and to discourage incompatible uses.” 142 Wash.2d at 556, 557, 14 P.3d 133 (emphasis removed); RCW 36.70A.020(8), .060(1), .170(1)(a). The County has the responsibility, once that designation exists, to conserve and enhance agricultural lands under the GMA.

King Cnty. v. Friends of Sammamish Valley, No. 102177-1, 2024 WL 4231188, at \*9 (Wash. Sept. 19, 2024)

The staff presentation posted on the website appears to suggest that the County, and the cities, are making requests that include the conversion of 700 acres in requests by cities for their UGAs and separate individual requests to convert 4760 acres of agricultural land and 3030 acres of Forest Lands. The County should reject any conversion of the Agricultural Lands that have been previously designated being considered for conversion.

Third, FOCC opposes the granting of any SMO as a part of the Comprehensive Plan update and emphasizes our comments made in our scoping notice letter that a full and comprehensive EIS would be required of the all the environmental impacts of the SMO requests, especially those in the Chelatchie area.

Best,  
*Ann Foster*  
Ann Foster  
President, Friends of Clark County