

**From:** [Jude Wait](#)  
**To:** [Jeffrey Delapena](#)  
**Cc:** [Jose Alvarez](#); [Jenna Kay](#); [Oliver Orjiako](#); [Ann Foster](#); [Rebecca Messinger](#); [Jude Wait](#); [Sue Marshall](#)  
**Subject:** Council - Dec. 6  
**Date:** Friday, December 6, 2024 2:41:09 PM  
**Attachments:** [Comp Plan Alt comment References. Wait,J 241107.pdf](#)

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Attached (submitted on line) are my comments for today.

I have technical difficulties getting online unmuted. Thanks for trying. Perhaps we could have a trouble-shooting session. I've had success some times, but not the last 2.

Let's defer the county wide plan to the Ag Advisory Commission. It needs a LOT of public input not just a consultant with the external disconnect. TBA.

thanks!  
Jude

On Thu, Nov 7, 2024 at 1:01 PM Jude Wait <[wellsavelle@gmail.com](mailto:wellsavelle@gmail.com)> wrote:  
Jeffrey, Planning Commission, County Planners, and FOCC

I am writing to submit this testimony and comments for the public record and Planning Commission consideration per the November 7 Public Hearing on the Proposed alternatives for consideration in the environmental review for the 2025 comprehensive plan.

I would like to provide oral comments to summarize my main points, likely online rather than in person.

My apologies for this late pre-meeting submission on Public Testimony and Comments update.

1. As it appears that previous comments need to be resubmitted in order to carry forward to inform your important decisions, I have attached one set of Pages from the June 18 DEIS scoping meeting. I will not resubmit all of those comments herein that are important. Instead I am adding the References cited pages I failed to include in June.
2. Today, I will focus my testimony on the topic of agricultural, forestry, open space, and land use conversion issues. -- Attached and below. as well as brief comments on the proposed Alternatives generally.

I will focus my new comments on review of the Six (6) long "AGRICULTURAL RESOURCE LAND ANALYSIS FOR DETERMINATION OF DE-DESIGNATION IN CLARK COUNTY, WASHINGTON" which are significantly boilerplate and all come up with the same redundant recommendations about de-designation.

I see these "public" City and consultant (May 2024) submissions that attempt to justify land

use conversion and Urban Growth area expansion by the Cities of Camas-Washougal, La Center, Ridgefield (2 Assessments), and Vancouver.

These Assessments are apparently submitted in lieu of an area-wide agricultural assessment apparently violating "(1) In classifying, designating and de-designating agricultural resource lands, counties must conduct a comprehensive countywide analysis consistent with WAC [365-190-040](#)(10)."

Instead of multiple piecemeal analyses of small areas -- each City (2024) and the "Light Industrial" proposal of 2015 --, the County, landowners, and developers could have satisfied the statutes and intent of the GMA by commissioning a countywide analysis. I recall you almost did so in 2018 when you discovered, again, that you did not have a complete understanding of farm acreage categories (Current Use, Ag-Zoning, Rural farms, Urban farms, etc) What are you avoiding? Indeed, Globalwise agreed, after their 2007 analysis, that a "census" (Prenguber, personal communication 2013) would be the best approach to make up for the limitations of his assessment, and our knowledge of the actual factual state of farming in Clark County.

With all due respect for the County Planners, the Cities, Landowners, and agricultural economists, Commissioners and Councilors, please consider my input. I also call on us to consider the input of FOCC, Futurewise, and farmers (as if farmers have time or bandwidth to be "at the table").

Thanks for your attention to long-term planning for a livable and equitable Clark County .

Respectfully submitted,

Jude Wait, Ph.D., MiM

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*pronouns: they/their*

On Fri, Nov 1, 2024 at 1:55 PM Jeffrey Delapena <[Jeffrey.Delapena@clark.wa.gov](mailto:Jeffrey.Delapena@clark.wa.gov)> wrote:

Enclosed are the Planning Commission agenda...

A public hearing has also been scheduled for Thursday, November 7<sup>th</sup>, at 6:30 p.m., on the topic of Land Use Alternatives to study in the DEIS.

From Jude Wait to Clark County. 11/7/2024

Here are the References Cited in dissertation excerpts emailed June 5 as part of Comments submitted;  
See also attached pages from the 7-18-2024 Planning Commission's Index Record

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