

From: [Jeffrey Delapena](#)
To: [Jude Wait](#); [Cnty 2025 Comp Plan](#)
Cc: [Oliver Orjiako](#); [Jose Alvarez](#); [Bart Catching](#); [Jenna Kay](#)
Subject: RE: DEIS Comments 11/30-a-2--- Wellsave re DEIS Alts, GMP & Ag Land Study
Date: Monday, December 1, 2025 11:36:21 AM
Attachments: [DEIS Comp Plan Update - Wellsave-a 251130.pdf](#)
[Maps online bundle FYI via Wellsave.pdf](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good day, Jude,

Thank you for this feedback related to the Draft Environmental Impact Statement for the 2025 Comprehensive Plan Update.

I have forwarded your comments to additional Staff and will enter these into the Index of Record.



Jeff Delapena
Program Assistant
COMMUNITY PLANNING

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From: Jude Wait <wellsavellc@gmail.com>
Sent: Sunday, November 30, 2025 4:12 PM
To: Sue Marshall <Sue.Marshall@clark.wa.gov>
Cc: Matt Little <Matt.Little@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>; Ann Foster <annfoster5093@gmail.com>; Mo McKenna <momoflowerfarm@gmail.com>; Bart Catching <Bart.Catching@clark.wa.gov>; Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>; Diane Dempster <dianedempster36@gmail.com>; Dillon Haggerty <dilishfarm@gmail.com>; Edward Hamilton Rosales <ed.rosales@wiafs.com>; Joe Zimmerman

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Subject: Fwd: DEIS Comments 11/30-a-2--- Wellsave re DEIS Alts, GMP & Ag Land Study

EXTERNAL: This email originated from outside of Clark County. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Everyone.

Here is a direct copy of my comments (already submitted to the comp.plan email) for dispersal to the Commission public comments.

Thanks for all your great important work!

best wellness wishes,

Jude Wait, Ph.D.

Wellsave LLC

----- Forwarded message -----

From: **Jude Wait** <wellsavellc@gmail.com>

Date: Sun, Nov 30, 2025 at 2:54 PM

Subject: DEIS Comments 11/30-a-2--- Wellsave re DEIS Alts, GMP & Ag Land Study

To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>

Cc: Food System CARE <foodsystemcare9@gmail.com>

Dear Cnty 2025 Comp Plan DEIS Staff, County Council, Planning and Ag Advisory Commissions, and Friends,

Attached you will find my long comment document with a detailed Table of Contents for ease of navigation to specific issues via hot links.

Also attached is one bundle of maps and corresponding images from GIS Maps Online for North County, Ridgefield, and La Center. The maps illustrate an accessible type of parcel-specific information available to better understand what is being proposed for Zoning changes, the context and online / remote sensing ground-truthing. As noted in

the comments document, the imagery is 2023, so zooming in via google earth would reveal current conditions, in case conditions have changed in the last 2-3 years.

Thanks for your attention and considerations supporting the future of farming in Clark County. We welcome your feedback, corrections (to assumption etc) questions, and more dialogue on solutions to our challenges.

Respectfully submitted

Jude Wait, Ph.D.

Wellsave LLC

DEIS Comp Plan Update - Wellsave-Part A

Submitted by Wellsave Director Jude Wait, Ph.D

DATE: 2025-11-30

TO: Clark County Comp Plan Update process – DEIS Alternative comments

TO: County Council, Planning Commission, Ag Advisory Commission. Staff, Friends

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Final EIS Presentation Suggestions & Notes

1. Please consider include a List of Tables and a List of Figures additional to the current Table of Contents (TOC). I know, that’s long
2. For easier review and navigation, you could also consider inserting the subcategories such as “3.2.2.3 Impact of Alternative 3”
3. The TOC should reveal the structure. Consider the current TOC to be the short version, and you could make a long version with the entire structure (with hot links!!!)
4. Need a summary of change table to augment Table 13 Soil Capabilities for Agricultural Uses:
 - a. NOTE: Table 20 Alt 1 soils is cross-referenced to Table 22 Alt 2 Soils impacts which shows change from existing conditions (thanks), and Table 24 is Summary of Alt 3 Impacts with change from existing conditions.
 - b. It would be good to have a Table explicitly comparing Alts 2 and 3, to reveal urban conversion levels.
 - i. It looks like Alt 3 loses 936 acres of wet and poorly drained soil.

- c. In trying to interpret the impacts of Alt 2 compared to Alt 3, we remember Table(s) staff presented to the County Council, explaining all the Zoning Change Outside UGA (green dots on Figure 4). Please re-share the tabular explanation of acres and zone changes proposed. Please retrieve the tables archived in a meeting presentation file to reshare in the Final EIS and for everyone to see sooner.
5. You could add a section on Impacts to Agriculture, so we hundreds of farm and ag supporters have an easier time interpreting proposals and impact, whereby we might add even more mitigations.
6. Also NOTE the “Outside UGA” compares to existing conditions, and therefore does not consider the proposed UGA expansions.
7. Figures 3 and 4: Maps of Alt 2 and 3, pp.
 - a. “City Initiated Actions 1 and County Initiated Actions 1” What does the 1 mean?
 - b. For Fig 4 Alt 3, what does the 2 mean?
8. For each Alternative, it would be helpful to have current (and proposed) actual zoning conditions. Such a Map would be like Exhibit 1 in the Ag Lands Study.
 - a. Each City/UGA map could also include some color coded zoning for the areas outside the UGA for context on the region’s actual agricultural designations and Prime/Important soils.

Summary of the Most Urgent Considerations

Significant Adverse Impacts of Alternatives 2 and 3

***Unmitigated adverse impacts on natural resource (NR) considerations, indicated in Alternatives 2 and 3, point us to recommending Alternative 1 (assuming a Revised Growth Management Plan).

Irreversible loss of Rural & Resource land & high quality soils

1. Loss of “Commercially significant” Agricultural Production capacity land through the urbanization of currently zoned Agriculture and Rural land (mapped and analyzed in the Ag Land “Study area”)
 - a. Designated Ag Land use under Alt 3 loses **1,859 acres** (DEIS p. 138)
 - b. Rural Residential land loss for Alt 3 is a reduction of **1,410 acres** (p.136)
2. Both Alts 2 and 3 project a loss of farming acres, which, even according to the Ag Land Study, have a high potential of being Commercially Significant
3. The DEIS (p. 137) also recognizes that these lands can
 - a. Create a buffer to resource-use lands
 - b. Conversion to Non-resource and not-agricultural uses “are generally not compatible with the surrounding rural area...”
4. Some of the proposed de-designation and/or rezoning “create a ring around Agriculture designated land” (DEIS p. 138). This might be considered additional (avoidable?) fragmentation.

Evidence-based considerations

- Promoting “Local and regional food systems” helps mitigate social, economic, and environmental impacts, especially as food supply chain disruption impacts us all.
 - Supporting and protection farmland is a solution to multiple impacts
- Several articles recently published document the concerted and wide-spreading adoption of the ongoing transition back to local food production, the imperative in the context of regional food systems responding to industrial production “shift,” and the resulting “Small Farm Comeback.”
 - The Pandemic stimulated some accelerated adjustments favoring the nimble adaptability of local-regional supply chain participants. Certain hubs had more readiness and capacity than others. Investments followed this need, but now the Federal chaos has terminated many pathways to resilience (such as ag research and pathways for the next generation of farmers.
 - Multiple crises are currently impacting industrial farm sector: rising costs of transportation, tariffs, trade wars, loss of baseline subsidies (research and development included), loss of services (USDA crises), and complete loss of a major export market (USAID)--added to the highly amplified labor crisis and the shutdown. Add rising food insecurity and depleted assistance.
- Working farms and open space require significantly less municipal financial burdens (services) than residential development (American Farmland Trust research and monitoring). Specifically, for every one dollar in local taxes paid, farming and open space require \$.35 in services compared to \$1.16 in services for the average home (Trust for Public Lands 2014).
 - Urbanization is more expensive to municipalities
- Small farms here are not waiting for help, and the majority are too busy farming to engage in policy. They continue to plan and grow and collaborate to ensure our local community has access to healthy fresh local produce. For example, local farms are pivoting away from the loss of 5-20% in sales due to the cancellation of Local Food Purchasing Assistance. The Food Bank and other hunger relief organizations stopped (or slowed) buying local farm products. Farmers deserve just compensation to enable their economic viability. .

These factors, including the prior loss of capacity evidenced by a high turnover rate and ag statistics, make the opportunity to support local farming an imperative. Save what we have and grow more!

We operate in a context we cannot really control, so our local choices matter all the more. Now is the time to choose to support local farm viability. Protecting farmland is a key variable and we can choose to establish remedies before we urbanize any more farmland. Other Counties in Washington, and the State as a whole, support agriculture. Let’s change Clark County’s reputation and more fully mitigate the growth that urbanizes farmland.

Highlights of DEIS Valuation Challenges

Valuation challenges refer to the problems of NOT valuing farming and farmland, NOT counting farms and the economic contributions. Not counting the jobs. Not counting land stewardship as a need—for the multiple benefits to resources and rurality.

Rural and Resource Lands

There is no adequate justification for converting Resource or Rural lands into Urban zones.

- Fragmentation is NO excuse for further diminishing the value of existing Resource and Rural lands that are now, have been, or could be in the future, engaged in agricultural production.

Economics of Agriculture and Local Farm Contributions

Especially alarming: Farmers are not counted in the jobs and employment figures in the DEIS. All the data presented is actually sourced from "**non farm**" statistics (but not reported as such in the DEIS). For more on the DEIS Economy section deficient, see also FOCC Economy critique.

DEIS table 76 only reports

Agriculture, forestry, fishing and hunting 568 jobs by 92 firms

- Farm operators and farm workers are apparently overlooked... and un-reported. Indeed the whole sector is UNCOUNTED in the baseline data the County is using.

Thankfully, jobs are counted in the USDA agricultural census of 2022, so we re-submitted Census County Profile plus 3 additional tables were attached to a separate transmission with similar information.

Thousands of Jobs: Employment, and Labor Highlights:

- Total number of Producers: 3,560 (counts from 1 to 5 producers on a farm)
 - Market Value of Products sold \$58,969,000
- Farm Workers: Hired Farm Labor total 2,356 on 370 farms for a total of \$20,263,000 payroll,
- Plus 2,111 unpaid workers on 810 farms

Farm Jobs: $3,560 + 2,356 = 5,916 + 2,111 \text{ unpaid} = 8,027$

Farmers are commercially operating farm businesses; generating a significant local economy that matters to many thousands of people. Farms provide jobs and potential farm and food business expansion, education, food security, environmental protection, and climate resilience.

As for land use designation: Whether farmers are operating on agricultural zoned land or rural or residential zoning farmland stewardship and production matters.

The Agricultural Lands Study only mentions the Census of Agriculture in the section on Food Security, noting 324 farms marketing direct-to-consumer sales totalling \$3,460,000 (5.9% of all farm sales. Local dollars multiply locally.

The Ag Lands Study does provide extensive documentation of widespread Agriculture of Long Term Significance across the "study area" that includes both Ag and Rural zoning.

Context matters. Farmers matter. Farmers are listening to one another, and we hope the County will take better notice:)

Summary of Recommendations

***Given the newly released Agricultural Lands Study, we assume the Soils (and other) sections of the DEIS may need to be revised.

Farmer-focused recommendations

- We agree with FOCC on the unmitigated adverse impacts of Alternatives 2 and 3. FOCC favors Alt-1 that would not allow any UGA expansion.
- One farmer on the Ag Advisory Commission recommended a moratorium on any de-designation of agricultural land.
- We further recommend a long-term policy of "no net loss" of farmable land (regardless of Ag or Rural zoning).

Introduction and Background

References and Attachments

Documents **reviewed** for these comments on the DEIS include

- the DEIS in its entirety
- the [draft chapters](#) of the updated Growth Management Plan,
- the existing GMP (cursory skims)
- the Agricultural Lands Study entirely
- FOCC comments on the DEIS (11/27/2025),
- CREDC Economic Development plan 2024
- Clark County profile source data ([Employment Security Department](#))

Previously submitted public comments to the Comp Plan

- 2022 Census of Agriculture County Profile-attached again,
- Protecting Farmland Strategies Wait 2017
- Roots to Bounty LCC – CREDC 2016
- Food System Council 2013 Ag Land Proposal

- Clark County Profile (Chapter 4) in Wait 2021
- Survey results of Farm and Food Justice Network outreach for Climate Element stakeholder engagement, as a member of the Environmental Justice Coalition

New Submitted Attachments

- Additional Tables from the 2022 Ag Census
- Maps illustrating the overview of City-adjacent [parcels proposed](#) for Urban expansion under Alternatives 2 and 3
 - Parcel Specific information was downloaded and viewed, but is not directly attached to this public record submission.

Assumptions & Intentions

We are proposing to assume that Alternative 1 is “no action” on the Comprehensive Plan 2015-2035 as Adopted PLUS the Proposed Amendments, the new Climate Element, and (still in DRAFT forms) new Appendices. We are looking forward to the new Update for the Comp Plan guiding the future, as the issues presented in the DEIS are covered in greater detail (such as Urban overlay implications—we hope). Despite the confusing process timeline to comment on a DEIS regarding Alternatives 1-3 on the Comp Plan Update, we will comply.

We intend these comments to be a contribution to the County, key stakeholders, Commissions, and of course farmers— and we are totally open to corrections and responses. We mistakenly assumed DEIS comments deserved response, but that protocol procedural assumption is derived from experience in another State (CEQA), and Federal EIS processes (NEPA).

2025 Comprehensive Plan Update DRAFT chapter links

Guiding all the Alternatives, we refer to the following.

DRAFT update policies and Chapters are found in the following. We must assume these are close to final, given repeated presentations to the Planning Commission as follows: :

- Chapter 1 [Land Use](#)
- [Chapter 2 Housing Element - Goals and Policy Table](#)
- [Chapter 3 Rural and Natural Resource Element – Goals and Policy Table with Climate Integration](#)
- [Chapter 4 Environmental Element - Goals and Policy Table](#) and [Chapter 4 Environmental Element](#) working version
- [Chapter 5 Transportation Element - Goals and Policy Table](#)
- [Chapter 7 Parks, Recreation & Open Space Element – Goals and Policy Table with Climate Integration AND the Working Version](#)
- [Chapter 8 Historic, archaeological and cultural preservation Element](#)
- [Chapter 9 Economic Development Element - Working Version](#)
- Chapter 10 Schools
- Chapter 11 Community design

- Chapter 14: [Climate Element](#) and the [Chapter 14 Climate Element – Goals and Policy Table](#)
- Chapter 12 [Annexation Element - Working Version](#)
- Chapter 13 [Shoreline Master Program - No Changes Proposed](#)
- [Community Framework Plan - No Changes Proposed](#)
- [Community Design Element - Working Version](#)

There are bound to be new [Appendices](#) dealing with Transportation, Economic Development, etc. And of course, new maps as presented in the DEIS.

Wellsave Stakeholder Standing

Wellsave, LLC, is the consultancy network Directed by Jude Wait, Ph.D. Wellsave builds teams to tackle challenges and pursue solutions. We work directly with producers, conduct participatory community-based action research, and apply vast accumulated knowledge to affect policy, generate financial and informational resources, advocate for producer interests, and elevate diverse voices of under represented stakeholders. Jude has been partnering with farmers for 16 years—fully embedded in local, regional, and national agrifood system sector networks.

Wellsave co-founded the Farm and Food Justice Network and co-represented the Network on the Environmental Justice Coalition (EJC) for the Climate Element goals and policy recommendations with an Equity Lens further adopted by the Community Advisory Group (CAG) for the County’s Climate Project.

This 3rd round of GMP updates builds on an extended case study of Clark County agriculture, following on *The Resilience of Food Farming in Rapidly Urbanizing Regions* (PH.D. dissertation, Wait 2021). Our intention is to follow on recommendations and findings of the research, and serve the interests of stakeholders – especially those not as likely to be in the public input arena.

Our Network frequently engages with more than 130 people, primarily farmers, along with numerous organizations and institutions with farmers-support in their mission. We share information relevant to farm and food enterprises—including educational opportunities, technical assistance, research participation and resource acquisition options, funding leads, and policy alerts.

Our messages reflect our urgent response to a food system at-risk, high farm turnover, the imperative to foster climate resilience, and the need to value essential farmer contributions to food system sustainability and community well-being.

Substantive¹ DEIS Issues

Key issues to consider relate to the impact of Alternatives 2 and 3 on

- UGA expansion implications,
- Zoning changes on density
 - → Keep development inside Cities,
 - Infill is not a pleasant experience, but it's necessary, and we had hoped infill would preclude the paving-over in Ridgefield,
- Zoning changes pertaining to Agriculture, Forestry, or Ag/Wildlife,
- Zoning changes to Rural land.

Note: Recommendations in this document are meant to be considered mitigation of adverse and cumulative impacts.

Protecting Natural Resource Systems

***Given the newly released Agricultural Lands Study, we assume the Soils (and other) section revisions to the DEIS need to be considered.

***Unmitigated adverse impacts on natural resource (NR) considerations, indicated in Alternatives 2 and 3, point us to recommending Alternative 1.

****We would love to see a "Story Map" to cross-reference the DEIS and the Plan (and the Ag Lands Study findings), to inform the public, advisories, commissions, and decision-makers.*

Indeed, the Elements of the Environment (Tables 5-6) are all interrelated systemically, while our comments focus most on Energy and Natural Resources (Agriculture, Forestry, etc), Water Resources, Plant and Animal, and Earth (soils, etc), and of course Land Use, Rural, and Resource Lands. Ultimately, we must consider whether the Comp GMP and regulations mitigate potential impacts (DEIS p. 18).

***No-Expansion Alternative aspects Avoid Unmitigated Adverse Impacts and benefit accrue from: :

1. Maintaining Vegetation Cover (Air Resources)
2. Maximizing Water Resource protections
3. Preventing further paving over of precious soil resources
4. Protecting Plant and Animal habitats, and
5. Preventing irreversible conversion of rural land to urban uses

- The implied trade-off between Rural and NR lands (favoring Alt-1) and Urban jobs/housing (Alts 2-3) is a misleading framing.

¹ We understand the County might have more incentive to respond to substantive issues.

→ Urban densification can also be much smarter, greener, and environmentally resource-friendly.

***Apply innovative environmental and water resource mitigations and climate-friendly adaptations, which are available and modeled in other Counties, States, Cities, and regions.

Protect, Restore, and Enhance Agriculture Across Clark County

For UGAs and Cities (Supported by Clark County)

Now we have a timely opportunity—as the County and Cities come together to update the GMP and consider Alternatives encompassing all municipalities.

Please recognize the farming, urban agriculture in many forms, and traditional agriculture still happening inside the Urban designated areas.

→ *** Please generate a map of Current Use tax designations within the UGAs and Cities.

→ Identify and protect the farms, remnant farms, and food- growing sites, especially.

→ Consider buffers on these urban homesteads, food-producing gardens, bee-friendly habitat, pollinator habitats (Vancouver is now a Bee-friendly city), etc

Rural and Resource Lands

In general, and specifically, the DEIS discusses Resource and Rural Lands, including

- "...to supply nearby urban residents with locally harvested resource products" (p. 116);

Yet when Alternatives adversely impact these areas, the DEIS underplays and minimizes the imperative to project water resources, working lands, natural resources, and the rural landscape, as necessary components of a resilient agroecosystem. For example,

- "The loss of agricultural land would also affect other values that are associated with this land—aesthetic, recreational, cultural, and environmental" (DEIS p. 118)

Yes, "Fragmentation of the farmland base can make it more difficult to farm and can increase conflicts between agriculture and other surrounding land uses."

- But this is NO excuse for further diminishing the value of existing Resource and Rural lands that are now, have been, or could be in the future, engaged in agricultural production.

Urban Area Agriculture

→ Consider "urban agriculture" enterprise development on urban-rural interface and buffer parcels.

- Highlight existing urban agriculture activities (see also Climate goals and policies)
- Map, celebrate, and protect farms in the Cities and UGA where they still exist
- Map Current Use parcels in the UGA and Cities.
-

Development Rights

The DEIS states:

“Designated agricultural or forest resource lands may not be located inside the urban growth area unless a city or county has enacted a program authorizing transfer or purchase of development rights.”

- Cities could enact TDR / PDR for any parcel urbanization proposals.
- Incentivize urban infill and densification BEFORE and instead of Urbanized zoning

Land Tenure Infrastructure

Before more urbanization, establish multiple avenues to improve land tenure for farmers.

1. → See also Goals and Policies in the Climate and cross-reference Elements for vetted recommendations
2. Establish community farms as production and training farms to facilitate trained labor workforce capacity, and all the multiple benefits.
3. Instead of Urban zoning, consider ag-supporting infrastructure in these border parcels.
4. Facilitate succession and farm-link situations.
5. Remove barriers to new and beginning farmers land tenure security
6. See the data on farm ownership vs. leasing as an indicator of a farm resilience deficits needing more attention
7. Consider a “homestead” classification for Rural land farms (and some Residential—especially low-density

Honor Soil Health / Capability vs. Urbanization

- Worst case (Alt 3)
 - Urbanization (Alt 3) would mean the loss of 1,826 acres in Parcels with Prime and Good Soils
 - Plus 1,993 acres of Prime and Good Forest Soils

Maybe that’s a low percent of all these soil types, but ALL loss is a loss and the DEIS underplays the significance of any percent loss, given the extensive HIGH percent loss already impacting Clark County.

- Measure the cumulative impacts and adverse trajectory.
- Lost Prime land does not justify more loss, whatever the %

Climate Change

The DEIS begins to do a diligent job starting to integrate Climate resilience discussion in the DEIS. A whole “chapter” on mitigation and adaptation would be informative to ensure urgent and much-needed policies and implementation strategies. We look forward to the finalization of the Climate (and other) Elements. Wellsave, the Farm and Food Justice Network, the EJC members, and many community partner have invested in our collective vested interest and support for more sustainable growth in sectors with multitudes of direct and co-benefits. .

Water Resources

Stormwater

For any Alternative, maximize Mitigation Measures implementation.
Much more could be done. See also FOCC comments.

See also the Salmon Creek Solutions project of the Public Works Clean Water Dpt

- Apply Salmon Creek Solutions for Stormwater runoff management, pollution prevention, and other solutions to the whole County !**

Groundwater “recharge”

We question your assumptions on groundwater recharge and believe additional mitigation and considerations are needed.

If you are assuming any of the housing developments actually facilitate “recharge” through “green” spaces (lawns, landscaping, gardens) you may be very mistaken. Our first hand experience and observation is that ALL the precious topsoil is removed, stockpiled, and hauled away. This is presumably “required” to establish building foundations on the “bedrock” but in condo and apartment and subdivisions, **this means NO more infiltration. Ask any other hydrologist or watershed scientist. Indeed, runoff impacts are logarithmically increased from urbanization impact. Higher flooding levels peak sooner. Cumulative impacts accrue.**

Furthermore, these developments completely disturb the watershed processes. For instance, stormwater treatment “ponds” become toxic sludge repositories. Neighboring parcels become saturated (they already had the infiltration of a subdivision (none, except the “treatment” ponds). Frogs are no longer able to live. Birds no longer find refuge in these former ponds that might have facilitated filtering and infiltration. Results: Habitat destruction, pollinator dispersal patterns are disrupted, agrobiodiversity falls below positive resilience indicator levels.

Substantive Economic Significance

From the attached evidence (to the first Wellsave DEIS comment submission), you will find valuable contextual information to inform the DEIS, Comp Plan update, and Ag Land Study. [[apologies for repeating this...perhaps for emphasis and alarm and corrective measures]]

Ag Census Labor Highlights:

- Total number of Producers: 3,560 (counts from 1 to 5 producers on a farm)
 - Market Value of Products sold \$58,969,000
- Farm Workers: Hired Farm Labor total 2,356 on 370 farms for a total of \$20,263,000 payroll,
- Plus 2,111 unpaid workers on 810 farms

Farm Jobs: $3,560 + 2,356 = 5,916 + 2,111 \text{ unpaid} = 8,027$

Notably, the Economy sections of the DEIS fail to include this crucial data. The DEIS only reports [nonfarm employment](#). The Ag Land study is also deficient in considering this indicator of the significance of the Ag sector's economic contribution to the County. Context matters. The 4 Attached pdfs (to the prior submission on 11/30-a) include one of several previous submissions--County Highlights public comment ("PC-2022...") and 3 pages from the USDA 2022 Ag Census showing the Clark County data in 3 of the tables. See the whole [Ag Census](#) for more very interesting data on producers, crops, trends, demographics.

While not a single employer, and jobs are dispersed across hundreds of farms, the total job count is more than any single employer in Clark County, including Peacehealth. [[Consider the "Food is medicine" movement and VeggieRX, and the fact that farmers feed many thousands of pounds of food to many thousands of people in this County and beyond. We are significant!

Economic Opportunity & Jobs

Especially alarming: Farm operators and farm workers are apparently overlooked... and un-reported. Farmers are not counted in the [jobs and employment figures in the DEIS](#). All the data presented is actually sourced from "**non farm**" statistics (but not reported as such in the DEIS). DEIS Economy section deficient (see also FOCC link if you want to see another riff). DEIS table 76 only reports

Agriculture, forestry, fishing and hunting 568 jobs by 92 firms

Economics of Agriculture and Local Farm Contributions

Thankfully, jobs are counted in the USDA agricultural census of 2022, so we re-submitted Census Data. Highlights. Farmers are commercially operating farm businesses; generating a

significant local economy that matters to many thousands of people. Farms provide jobs and potential farm and food business expansion, education, food security, environmental protection, and climate resilience.

Unfortunately, the Agricultural Lands Study only mentions the Census of Agriculture in the section on Food Security, noting 324 farms marketing direct-to-consumer sales totalling \$3,460,000 (5,9% of all farm sales. That's a great start.

- Also, since the Ag Land Study provides detail on several other Counties, the Ag Census profiles of those Counties should be included for equitable review of the divergent contexts. Other Counties demonstrably value their agricultural sector.

As for land use designation: Whether farms are operating on agricultural zoned land or rural or residential zoning→ farmland stewardship and production matters.

The Ag Lands Study does provide extensive documentation of widespread Agriculture of Long Term Significance across the "study area" that includes both Ag and Rural zoning.

Clark County Agricultural Lands Study – Review

Why insert more Ag Lands Study input here:

We include the following comments on the Ag Study here, because the Study will have bearing on the Alternatives that include de-designation of Resource Land, incorporating Rural land into the UGA or City, and other policy issues (GMA update, DEIS mitigations, Climate and resilience considerations, etc). There appears to be no other official way nor critical timing for having this input considered in the Comp Plan update.

Furthermore, the Ag Study apparently failed to include consideration of public engagement data, namely several interviews held after Sept 3 are not reference, whereby the interview dates and associated attribution are not listed. Instead, the 13 (minimum for the contract) listed interviewees primarily overlap in representation (or are direct members) with the Ag Advisory Commission. This means the data reflect a small selection of the stakeholder population already having the most significant impact on the Ag Study conversations and their particular farmland issues dominate. Therefore the potentially more diverse stakeholders' voices and perspectives are missing or marginalized. Such erasure diminishes trust.

- ***The DEIS could outline a mitigation for engaging (and considering) more diverse perspectives affecting agricultural significance and food security in Clark County.
- Please summarize the data again, with all the interviewees' input.

Instead of building trust and engaging more diverse voices, as the Land Study recommends, the opportunity appears to have been bypassed even though data was collected. Trust is broken

through apparent erasure and misleading indications of inclusion. How many people provided input that was not reported as being considered? Do others realize this?

Think Outside the [Big] Box

One of arguments seemingly to indicate support for de-designating resource land, discussed at a County Council work session (Nov 12) and a subsequent Ag Advisory meeting (Nov 18), presented the example of land adjacent to a big box store in Ridgefield where I-5 bisects the Ridgefield-UGA. We might call this the “Costco effect” whereby some people assume that the “significance” of farmland adjacent to a big box store would be disadvantageous or unattractive. Right—it’s not an idyllic rural farm scenario. But it could serve a huge gap in infrastructure needs for the entire region.

- We recommend the County consider an agriculture-related site development that would include a scalable food hub, much needed affordable greenhouse facilities for season extension by multiple farmers, a year-around farmers market to supply wholesale, restaurant, food producers, caterers, other food hubs, commissary kitchens, retail customers, SNAP, WIC and VeggieRX subscribers, etc.
 - This is an agriculture activity appropriate for being urban-adjacent
 - centrally located on the RR line, near 2 Ports (Ridgefield and Vancouver), and on the mainline highway corridor (I-5).
 - We know a lot of local foodies shop at Costco, so they would be able to access real local farm products in the same trip.

Map Evidence Reviewed—See [Below](#)

- Thanks for field recon by a County Councilor, inspiring us to drill down into the data,
- →We additionally zoomed in on the regions to review the site-specific GIS online maps (and Google Earth) (attached)

Indicators of “Long-term Commercial Significance for Ag

The following is a list (from the Ag land Study Report Table of Contents with page #s)

Indicators Used in Final Analysis

1. Prime and Unique Soils 38
2. Tax Status 44
3. Predominant Parcel Size 51

The Indicators Evaluated not used

4. Public Facilities 41
5. Availability of Public Services 47
6. Proximity to Urban Growth Areas 49
7. Land Use Settlement Patterns 53
8. Intensity of Nearby Land Uses 56
9. History of Land Development Permits Issued Nearby 56

10. Land Values Under Alternative Uses	57
11. Proximity to Markets	58
12. Water Rights	58
13. Food Security	61

Indicator Considerations

We agree with NOT using Indicators for Proximity to Urban, Land Use Settlement, and Intensity of Nearby. These indicators are highly problematic and represent a negative lock-in resilience indicator. Instead of penalizing the adjacency challenges, widespread encroachment, and urbanization already allowed to accumulate, we need strategies to accommodate the realities and “[think outside the box](#)” in terms of enabling the contributions of ag and rural lands to continue.

Soil Health

Farmers work with a wide array of qualities of soil, and strategies to improve soil health. Across Clark County, some soil needs to be drained, as evidenced by a vast array of remnant tile drains, wetlands, and vegetative remedies (wet-tolerant trees to take up water). Some soils, in contrast, need amendments to improve water-holding capacity. Some viable farms occupy ridgetops and don’t map onto the Prime ranking at all.

Tax Status

To fully understand Current Use, the barriers to participation should be better understood and possibly mitigated. Parcel size is a factor. Ownership structure precludes some family farms from Current Use. Several farmers found Senior tax reduction a much easier route for older farmers. The back-tax penalty for a new owner to discontinue agricultural production is not a deterrent for wealthy buyers, but just a cost factored into a conversion to profit-motivated development and land speculators.

Scale of Operations

Yes, we need to maintain and prioritize less fragmented, larger parcels in “districts”. BUT since that is not a widespread reality,

- a whole range of sizes and situations should be considered for protection and food system projections (jobs, productivity, etc).

Given we have lost so much of the idyllic farmland, and in any case, there’s

- no reason to be so prejudiced against the small farms situated in even more fragmented isolation. How would you feel if you were marginalize while toiling the soil?

Clark County has always been dominated by small farms. See the 2022 Census of Ag: 87% of the farms were under 50 acres, 43% under 10.

Urban Growth Expansion Proposals

We were especially inspired to conduct site-specific and City-specific reconnaissance, given the recent reference to Costco and a report by one County Councilor and a Council worksession on the Ag Study, and reference to Costco by Ag Commission members and a Public comment.

We always had the intent to view the maps in detail, rather than just take a generic approach based on principles of not losing any more farmland—and not using

- the Ag Study or
- marginalization of the significance of agriculture

to justify further conversion of Ag to Urban.

Cumulative Loss of Capable* Farmland

By whatever the classification – Soils with high potential for agricultural production – are

- at-risk of conversion to non-ag uses,
- in great demand by farmers,
- Inaccessible to farmers
- Underappreciated
- In limited supply
- Largely unprotected by policy and urbanization economic drivers

Indeed, we submit that Clark County has experienced

- A very significant and cumulatively adverse loss of ag capacity
- High, unmitigated, farm turnover
- Many civic and agency stakeholders are inadequately engaged if at all, even when supporting farmers is in their mission somewhere.
- Accumulated unmitigated loss of ag capacity is due to a combination of loopholes, developer-pressured governance, a lack of political will, the lack of policy remedies, the under-resourced agencies who might respond by their mission, and a lack of concerted effort among the stakeholders.

This is the time to take a definitive break in compromising away the future of farming in Clark County. Remedies and adaptations are available, accessible, and cost-effective.

Paving farmland does not have to be seen as inevitable. Equitable valuation is past due. The “trade off” is socially constructed and definitely not something we must do now. We can stop the negative do-loop of a self-un-fulfilling projection. “Save” family farms and the future of farming in Clark County—“No Farms No Food” (AFT)-- we also recommend a wide spectrum of policies can be enacted in concert.

Wellsave Part B

Part B would include the parcel-specific data sheets. We review this information separately to respect the privacy of the property owners, in case the County doesn't want to include the map information in the public record. All information was obtained online and is therefore public. The evidence for current status is there for anyone navigating Maps Online to access. All info is available on request (already downloaded, reviewed, and saved).

Online Parcel-specific City Zoning change Proposals

We conducted some site-specific investigation of the proposed Zoning changes for Alternatives 2 and 3. We compared maps in the DEIS to parcel maps in Clark County GIS online.

NOT included in our Public Comments: We zoomed in on specific parcels and retrieved parcel-specific data that includes:

- Current Zoning
- Overlays
- Tax payment status
- Property Value
- Sales history
- And other environmental and infrastructure information

We looked most closely to see that there were several parcels (especially adjacent to Ridgefield and La Center)

- Zoning: Agriculture Ag-20
- Overlay: No Overlay or Urban Holding/Urban Reserve (Ridgefield) but La Center seems to have UR**
- Tax status: Regular on all

Area Maps attached—see

Two maps each for the following 3 municipalities: One is the area map and one has the aerial photography (Maps online is 2023 imagery). Therefore a google earth image is attached, to exemplify what the County and Public can review.

Ridgefield

La Center

Battleground

As we recall, FOCC submitted site specific soils information on these parcels proposed for Urban zoning. But the DEIS does not specify the details associated with the parcels.

How to mitigate the apparent implications of Urban overlays?

We heard that the development in Ridgefield (179th) was unstoppable and not open to public review because it had an Urban overlay.

The DEIS fails to discuss this, but the GMP itself does talk about Urban overlays. We looked it up to see if there were agricultural uses that could be considered for the Urban overlay areas.

Indeed: **40.250.110 Urban Holding Overlay (UH-10, UH-20)**

List includes:

j. Temporary dwellings
k. Accessory dwelling units
2. Services, Business.
a. Commercial nurseries predominantly marketing locally produced plants and associated landscaping materials
b. Roadside farm stand
c. Agricultural market

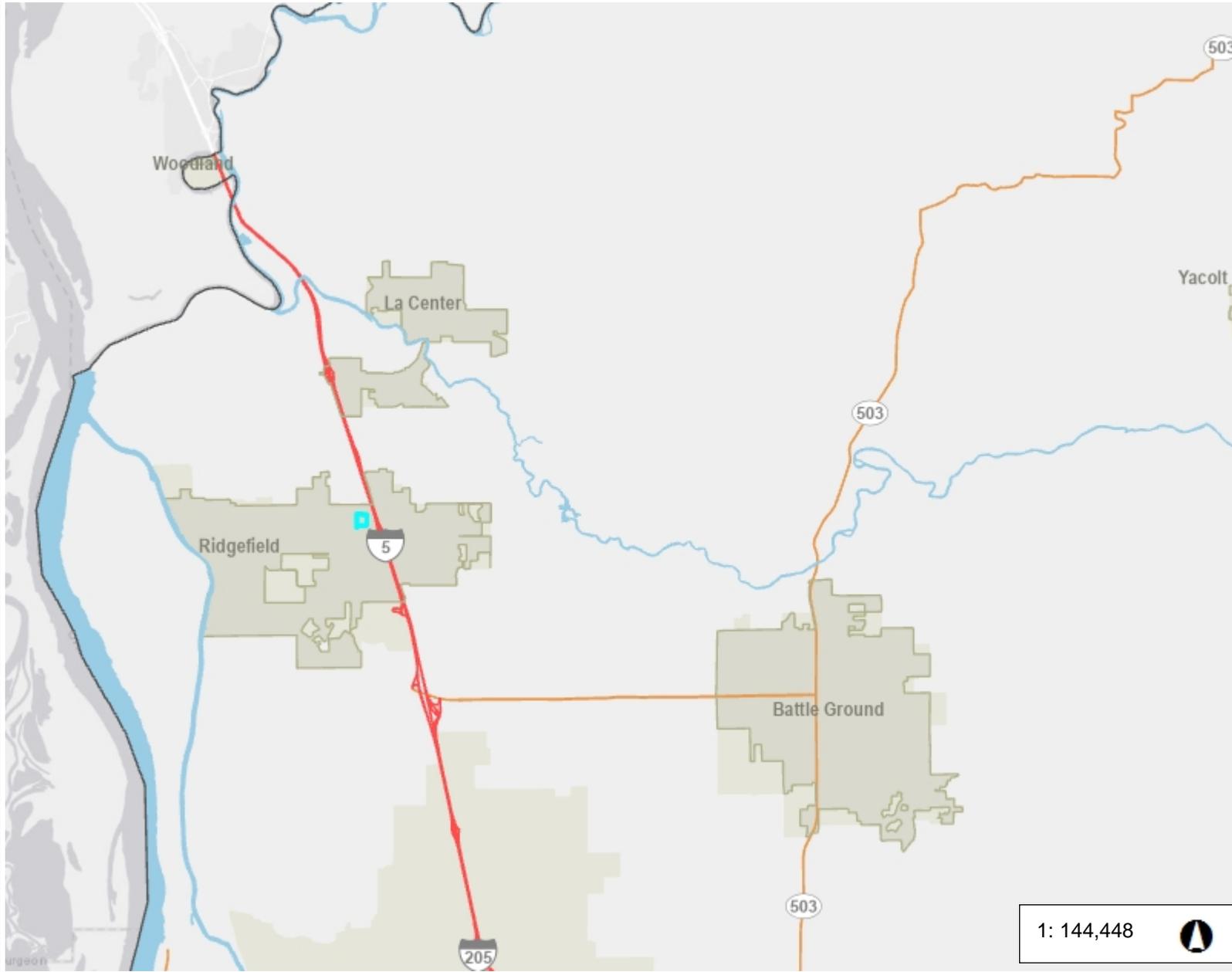
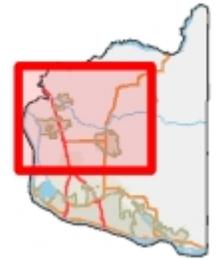
7. Resource Activities.
a. Agricultural and forestry, including any accessory buildings and activities
b. Silviculture
c. Commercial uses supporting agricultural and forestry resource uses
d. Quarters, accommodations, or areas for transient labor, such as labor cabins or camps

Therefore Urban overlay does not automatically mean destruction and removal of the valuable productive soil - which is an irreversible adverse impact.

This fits nicely with agriculture supply chain infrastructure needs such as “think outside the box” ideas.



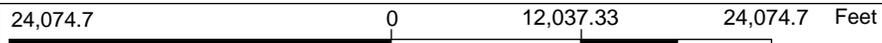
north Clark County



Legend

Notes:

1: 144,448

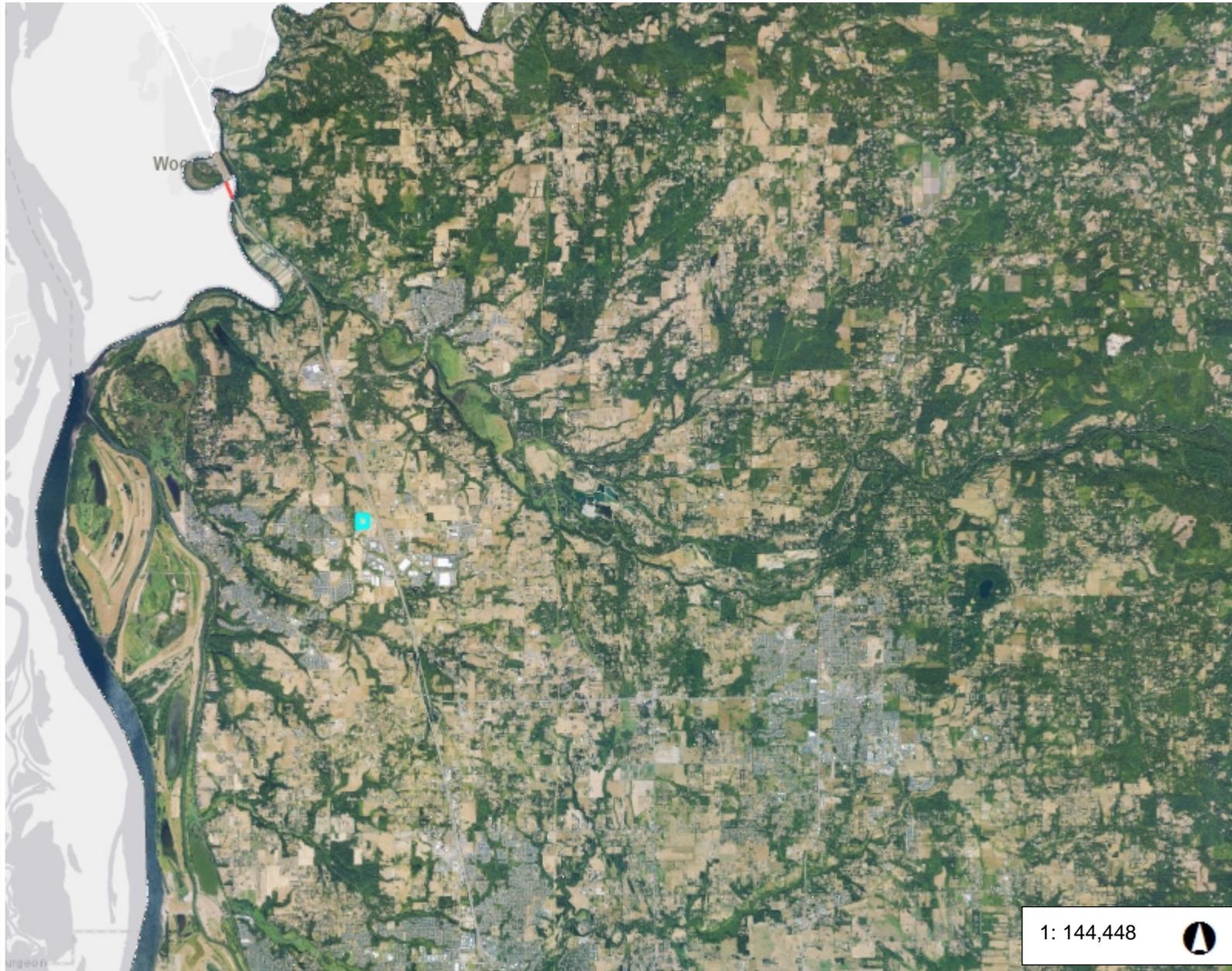


WGS_1984_Web_Mercator_Auxiliary_Sphere
Clark County, WA. GIS - <http://gis.clark.wa.gov>

This map was generated by Clark County's "MapsOnline" website. Clark County does not warrant the accuracy, reliability or timeliness of any information on this map, and shall not be held liable for losses caused by using this information. Taxlot (i.e., parcel) boundaries cannot be used to determine the location of property lines on the ground.



N Clark image



Legend

Notes:

1: 144,448 

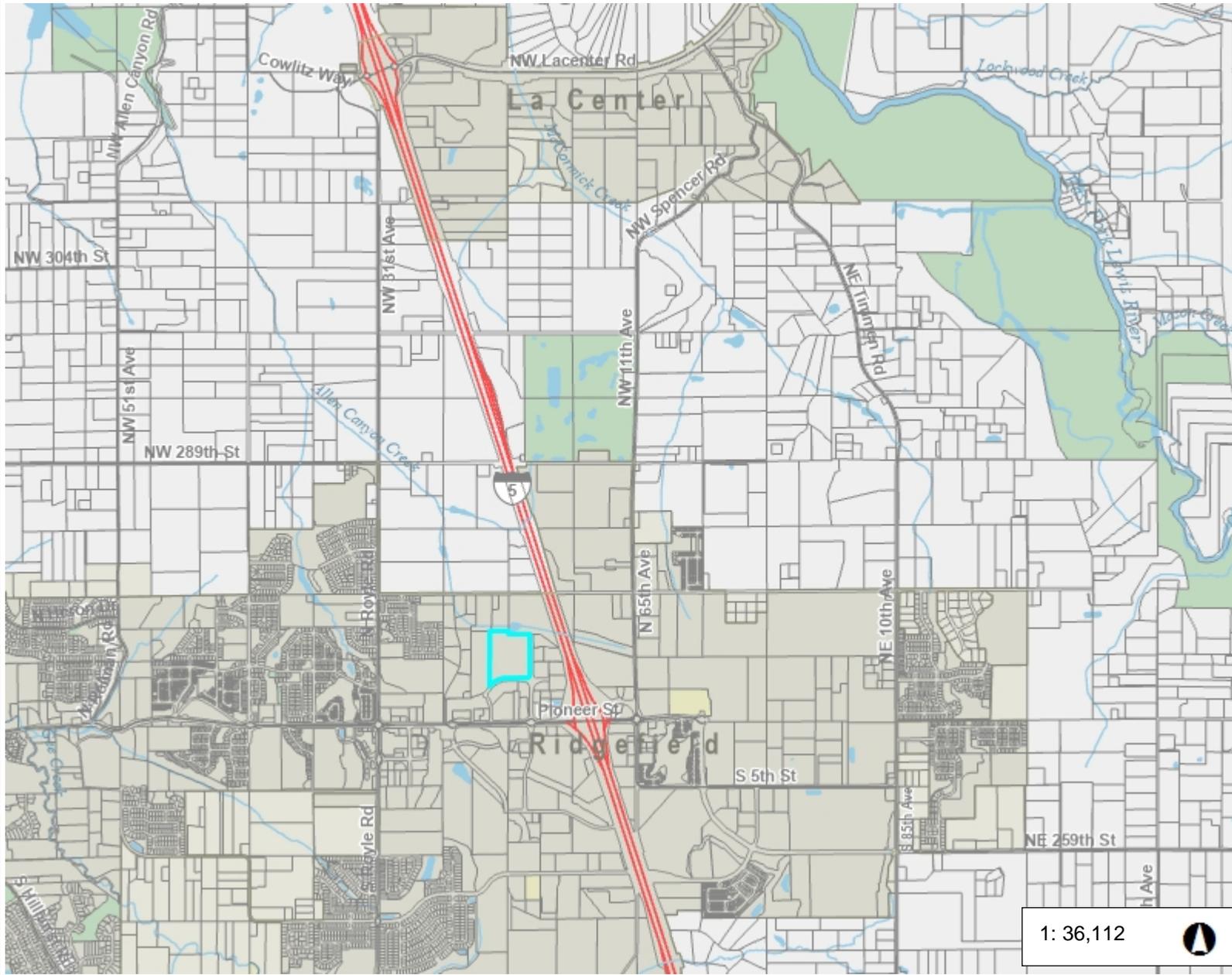


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Ridgefield Map



Legend

Taxlots

Notes:

centering Costco

1: 36,112



6,018.7 0 3,009.33 6,018.7 Feet

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Ridgefield image



Legend

 Taxlots

Notes:

1: 18,056



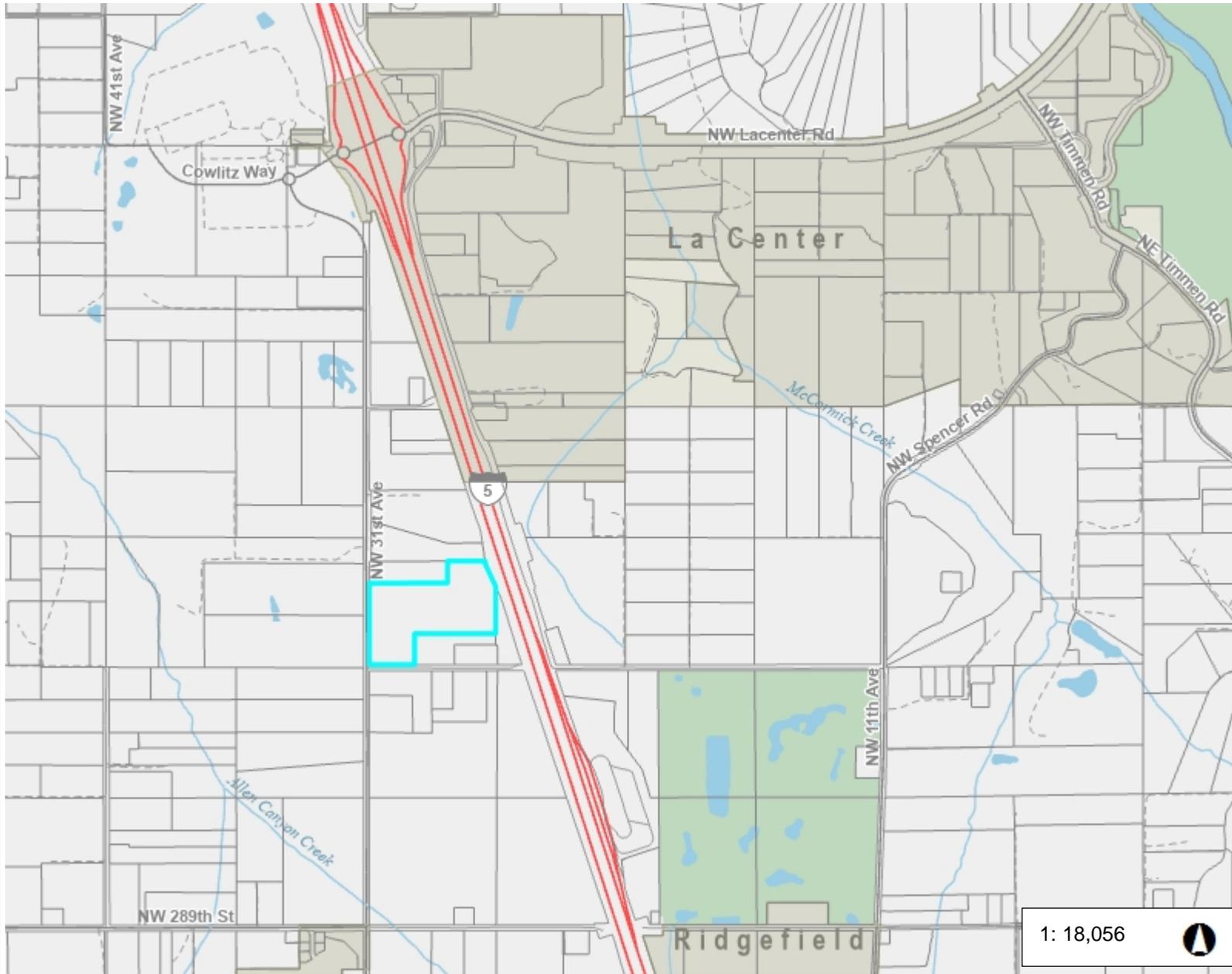
3,009.3 0 1,504.67 3,009.3 Feet

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La Center map



Legend

Taxlots

Notes:

1: 18,056

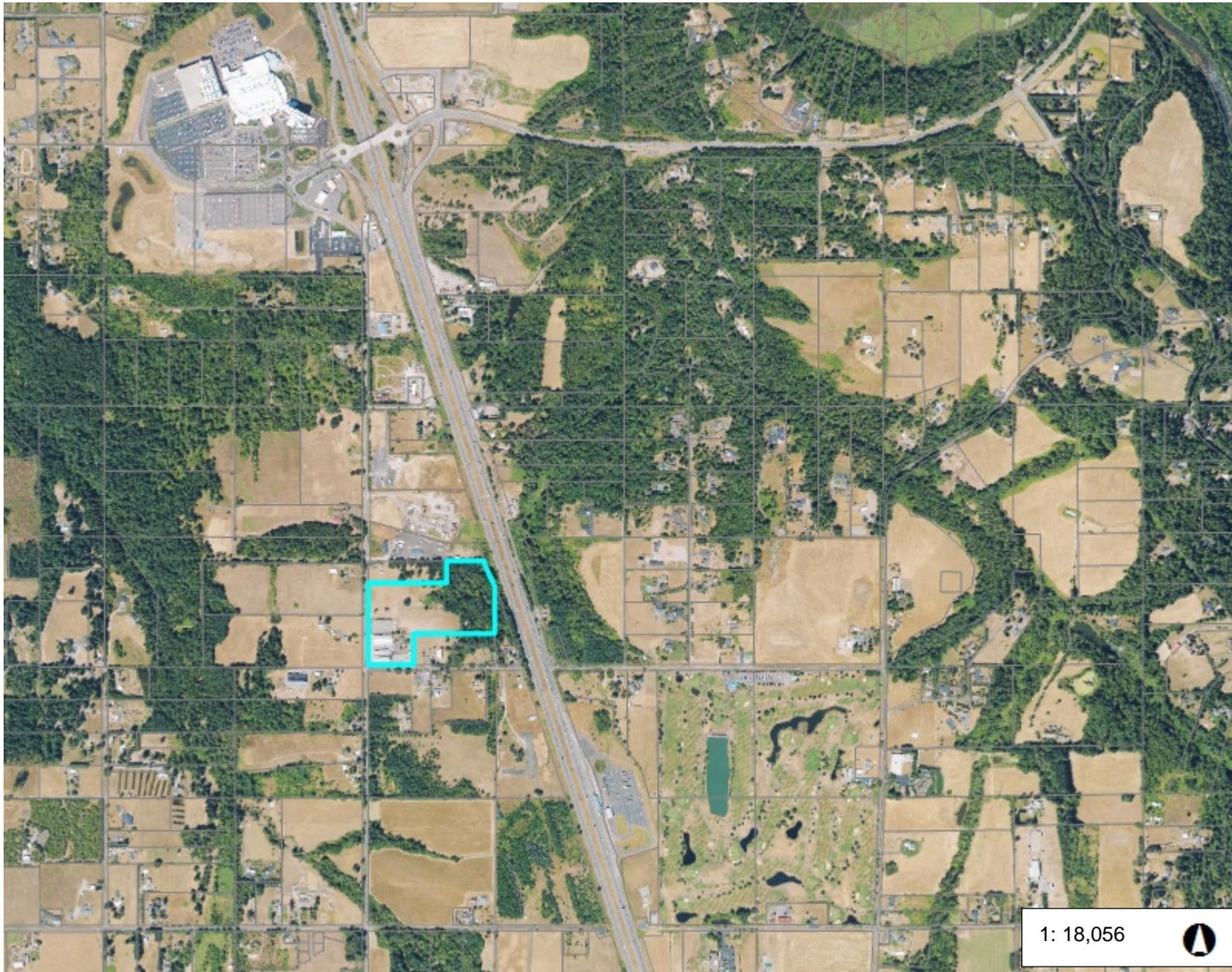
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La Center image



Legend

 Taxlots

Notes:

1: 18,056



3,009.3 0 1,504.67 3,009.3 Feet

WGS_1984_Web_Mercator_Auxiliary_Sphere
Clark County, WA. GIS - <http://gis.clark.wa.gov>

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costco, Ridgefield, WA

