

From: [Jeffrey Delapena](#)
To: [Heidi Cody](#)
Cc: [Oliver Orjiako](#); [Jenna Kay](#); [Jose Alvarez](#); [Rebecca Messinger](#); [Cnty 2025 Comp Plan](#); [Bart Catching](#)
Subject: RE: Group comment letter from 12 organizations: Please preserve Clark County's Prime Agricultural Lands
Date: Monday, December 15, 2025 4:38:46 PM
Attachments: [12.15.25_Group comment_Clark Co. Preserve Aq Lands.pdf](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

Good day, Heidi,

Thank you very much for providing this group comment and feedback related to the Agricultural Lands Study for the 2025 Comprehensive Plan Update.

This has been forwarded to additional Staff and will be entered into the Index of Record.

Best regards,



Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558



From: Heidi Cody <heidi@waconservationaction.org>

Sent: Monday, December 15, 2025 4:28 PM

To: Sue Marshall <Sue.Marshall@clark.wa.gov>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Matt Little <mattlittle4clarkcounty@gmail.com>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jenna Kay <Jenna.Kay@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>; Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>; Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>; Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>

Cc: Rev. Michael Jones Jr. NAACP <vicepresident@naacpvancouverwa.org>; Almendra Velazquez - Perez <almendra.v@fourthplainforward.org>; Monica Zazueta <zazueta_monica0813@gmail.com>; Hector Hinojosa <hh.bullit@gmail.com>; Ryan Griffith <ryan.griffith@fourthplainforward.org>; Susan Saul <conservation@vancouveraudubon.org>; Loveita Morrison <loveitam@odysseyworld.org>; Abby Hollopeter <abbyh@odysseyworld.org>; Mark Leed <markleed02@gmail.com>; Tyler Troelsen <tyler.troelsen@sierraclub.org>; Oskar Zambrano <oskar@waconservationaction.org>; Lennon

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Subject: Group comment letter from 12 organizations: Please preserve Clark County's Prime Agricultural Lands

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.

Dear Clark County Council and staff,

On behalf of the twelve organizations listed below, please accept our comment letter supporting the preservation of prime agricultural lands in Clark County. We are a group of local community-based organizations, mostly of color, who are [working together to advance equity and climate resilience in Comprehensive Planning](#) at Clark County.

- **We ask County Council to keep all the County's agricultural land designated as agricultural land.**
- **We ask County Council to designate additional agricultural lands in the County that were found by the study to meet the legal threshold for agricultural lands.**

Thank you for your consideration.

Sincerely, Heidi Cody on behalf of:

NAACP Vancouver
Fourth Plain Forward
Alliance for Community Engagement (ACE) SW WA
Vancouver Metro LULAC Council #47026
Vancouver Audubon
Odyssey World International Education Services
Sierra Club - Loo Wit Group
Washington Conservation Action
Columbia Riverkeeper
NAYA Family Center / NAYA Action Fund
SW Washington Equity Coalition (SWEC)
Vietnamese Community of Clark County



Heidi Cody (she/her)

SW WA Field Manager

Washington Conservation Action

ACE Coalition Manager

Evergreen Workers Union: Member of
Communications Workers of America Local 7800

Phone 718-986-2348

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Web www.waconservationaction.org

1417 Fourth Ave, Ste 800, Seattle, WA 98101

Dec. 15, 2025

Alliance for Community Engagement (ACE) SW WA

Dear Clark County Council and staff,

Thank you for your ongoing work on Clark County's Comprehensive Plan. As you consider whether to grant Urban Area Expansions, site specific requests and which Land Use Alternatives to choose, we invite you to consider Gresham, Oregon. Gresham sacrificed its prime farmland for rapid development, and today the Gresham community is dealing with the long-term consequences—sprawl, traffic and the loss of irreplaceable soils. Clark County does not have to repeat that pattern. Let's plan responsibly for our children's futures. We ask you to support and protect farms, forests, open spaces and connected wildlife habitat.

Honor Your Agricultural Land Study

Every Councilmember voted to require that food security be considered in your Agricultural Land Study. We now ask Clark County Council to acknowledge, accept and act on the findings of the Ag Land Study. Our future food security and climate resiliency depend on retaining Clark County's remaining prime agricultural land.

- **We ask County Council to keep all the County's agricultural land designated as agricultural land.**
- **We ask County Council to designate additional agricultural lands in the County that were found by the study to meet the legal threshold for agricultural lands.**

State-provided data demonstrate that all cities within Clark County have enough land to accommodate the projected growth estimates that Council adopted. Please work with the cities of Ridgefield, La Center and Camas to find Land Use Alternatives that reflect the Ag Land Study's findings, including:

- **All** currently designated agricultural resource lands provide long-term commercial significance to the agricultural industry using the criteria outlined in Washington State law (WAC 365-190-050). In fact, "96 percent of the Agricultural Designations (31,400 acres) are classified as Prime Farmland or Farmland of Statewide Importance. These lands represent an invaluable community resource as we consider the need to feed our growing population, local food security and climate change resiliency, and the future of the farming industry and jobs in the

agricultural sector as a whole.”

- "While food security outcomes may not be directly measurable through the GIS or land cover datasets central to this analysis, they are a critical qualitative factor in understanding the broader implications of agricultural land designation. As this study informs the County’s initiative to review these designations, the stability of food bank networks and strong farm to-market linkages are vital considerations for a resilient and equitable local food system. **The continued conversion of these lands to non-farm uses poses a direct risk to this system, as it may eventually undermine the viability of the local agricultural economy upon which these food security networks depend.**"¹
- This Ag Land study also found that “Clark County has *additional* incredibly high-quality soils in our rural areas that are not currently designated as agricultural lands but should be designated as required by state law.” We ask Council to add these additional lands to our designated ag lands.

Food Sovereignty and Climate Resilience

Maintaining local control of our food supply, or food sovereignty, is important for economic and emergency reasons. Many Clark County residents are interested in elevating Indigenous foods, food forests, and experimenting with reintroduction of beavers and other measures to take care of our land. All of these ideas are connected to climate resiliency, which is required by the Growth Management Act’s Climate Element.

Listen To the Expertise of your Agricultural Advisory Commission

Please also honor your own Agricultural Advisory Commission, whose position was summarized by your Ag Land Study consultant as: “to use encroaching development as a justification to de-designate land, you would essentially always be chipping away at agricultural land, which goes against the purpose of the agricultural land designations—the conservation purpose of that.”

There is no purpose in having an Ag Commission if County Councilmembers are simply going to ignore the Commission’s expertise.

Conservation of Birds and Wildlife

Agricultural lands are important for birds as a source of food, cover and nesting habitat. In Clark County, agricultural lands provide essential bird habitat, particularly for migrating and

¹<https://friendsofclarkcounty.org/the-results-are-in-focc-call-to-action-on-the-2025-clark-county-agricultural-lands-study/>

wintering waterfowl (swans, geese and ducks) and sandhill cranes. Grasslands can support species in decline, like the Streaked Horned Lark.

Habitat loss through conversion, degradation and fragmentation has significantly altered the landscape for birds throughout Clark County. Farms with a mix of crop and livestock operations, or those with more diverse landscapes including natural areas, tend to support higher bird density and diversity, which can be beneficial to agriculture, too. For example, owls are natural predators of rodents and mice, which are common pests in agricultural fields. By feeding on these pests, owls help in reducing crop damage and loss. Birds also help control insect populations that are harmful to crops, providing an important "agro-ecosystem service" for farmers.

Equity, Climate Resilience and Climate Justice

To keep building as usual and sacrifice our farmland for the sake of private interests who don't actually need it—as state data demonstrates—is fundamentally inequitable. Our Comprehensive Plan must intentionally protect the future for those who have historically, and continue to be, impacted by systemic racism, discrimination, poverty and environmental injustice. From our community engagement, we know that environmental injustices are directly harming the health of many already disadvantaged residents. You can't have food security or climate resilience without preserving land for farms, forests and tree canopy, wetlands and connected wildlife habitat. Once the farmland is gone, we can't get the land back.

Thank you for your consideration.

Sincerely,

NAACP Vancouver
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Vancouver Metro LULAC Council #47026
Vancouver Audubon
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Sierra Club - Loo Wit Group
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