

From: [Jeffrey Delapena](#)
To: [Cnty 2025 Comp Plan](#); justin@burgerfamilyfarm.com
Cc: [Oliver Orijako](#); [Jose Alvarez](#); [Rebecca Messinger](#)
Subject: RE: Comprehensive Plan Update Comments
Date: Wednesday, January 7, 2026 10:45:51 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good day, Justin,

Thank you for providing this feedback ahead of the Joint Hearing to select the Preferred Land Use Alternative for the 2025 Comprehensive Plan Update.

I am forwarding to additional members of Staff. Your comments will also be brought to the attention of the Planning Commission ahead of the Hearing and be added to the Index of Record.

Best,



Jeff Delapena
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COMMUNITY PLANNING

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From: Clark County <webteam@clark.wa.gov>
Sent: Wednesday, January 7, 2026 10:44 AM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Subject: Comprehensive Plan Update Comments

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Submitted on Wed, 01/07/2026 - 10:43 AM

First Name

Justin

Last Name

Burger

Email Address

justin@burgerfamilyfarm.com

Organization/Agency Name

Burger Family Farm

Message Subject

DEIS Comment

Comments

My name is Justin Burger. I am a farmer and rural property owner living in unincorporated Clark County. I do not reside within the limits of any city, but I live and work every day with the consequences of county land-use decisions. I appreciate the opportunity to provide public comment on the current Comprehensive Plan Update.

I strongly support Alternative 1, which proposes no expansion of Urban Growth Areas.

As a resident of unincorporated Clark County, I rely on the County to act as a steward not only for growth targets, but for agricultural lands, rural infrastructure, water resources, and long-term community resilience. Unlike cities, those of us outside UGAs cannot simply annex land, expand boundaries, or externalize impacts. When agricultural lands are converted, that loss is permanent—and the impacts are borne by rural residents first.

Clark County committed to conducting an Agricultural Lands Study and to forming an Agricultural Advisory Commission. Many of the cities that are now dissatisfied with the outcome of that study were strong proponents of it. The resulting study found that large areas of land—some currently undesignated—meet the criteria for Agricultural Lands of Long-Term Commercial Significance. The Agricultural Advisory Commission has confirmed that agricultural land in Clark County is in short supply and should not be removed through redesignation or UGA expansion.

County staff has concluded that existing UGAs are sufficient to accommodate projected population, housing, and employment growth. That conclusion should be respected. When cities argue that countywide assumptions do not apply to them, they are asking the County to substitute speculative, self-interested projections for consistent, defensible data. The County's numbers are the least biased and most appropriate to rely upon.

The Growth Management Act requires concurrency—growth should not occur until infrastructure is in place. Yet again and again, agricultural land is converted and hundreds of homes are built along narrow rural roads never designed to carry urban traffic volumes.. These roads also serve farm equipment, school buses, and emergency vehicles. This is not responsible planning; it is a failure to align land use with infrastructure.

From 2017 to 2022, Clark County lost approximately 34,699 acres of land in farms, according to USDA data—over 38% of total farmland. What rural residents have received in return is not affordability or sustainability, but sprawl, traffic congestion, declining water tables, fragmented farm operations, and mounting pressure on remaining agricultural producers. Once farmland is paved over, it is gone forever.

Agricultural and open lands are also critical to climate resilience. Working farms and open space absorb water, reduce heat, protect soils, and support local food security. Replacing these landscapes with asphalt and concrete increases vehicle miles traveled, stormwater runoff, and long-term infrastructure costs—all while reducing the County's ability to adapt to climate change.

I also support the comments submitted by Futurewise and Friends of Clark County, which correctly conclude that Alternatives 2 and 3 are unnecessary and legally problematic. As Futurewise has stated, the agricultural lands proposed for conversion meet multiple criteria for long-term commercial significance and cannot be lawfully redesignated under WAC 365-190-040.

As someone who farms this land and depends on it for my livelihood, I urge the County to stand firm. Alternative 1 meets state and local requirements, respects the data, protects agricultural lands, and avoids irreversible mistakes. Expanding UGAs where it is not legally required or practically justified undermines the very planning principles the Comprehensive Plan is meant to uphold.

Thank you for your time, your careful consideration, and for supporting a future where Clark County remains a place where agriculture, rural communities, and responsible growth can coexist.

Sincerely,
Justin Burger
Burger Family Farm, Unincorporated Clark County



