

From: [Jeffrey Delapena](#)
To: [Jude Wait](#)
Cc: [Oliver Orjiako](#); [Jose Alvarez](#)
Subject: RE: PDR/TDR re Land Use Alts to Mitigate Landuse, Water, and other adverse Cumulative Impacts
Date: Tuesday, January 27, 2026 4:41:00 PM
Attachments: [CCPH-FSC 2014 Conserving Farmland in Clark County.pdf](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good day, Jude,

Thank you for providing this feedback related to the 2025 Comprehensive Plan Update.

Your comments will be brought to the attention of Planning Commission ahead of the Jan. 29th continuation of the Hearing to select the Preferred Land Use Alternative. This will also be added to the Index of Record.

Best regards,



Jeff Delapena
Program Assistant
COMMUNITY PLANNING

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From: Jude Wait <wellsavellc@gmail.com>
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Subject: PDR/TDR re Land Use Alts to Mitigate Landuse, Water, and other adverse Cumulative Impacts

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Hello Planning Commission, County Council, Ag Advisory Commission, and staff,

For the records, and FYI,

What's NEW--an archived document (re Ag) and revisit an important issue (water)

Agricultural Land Conservation:

Attached you'll find a 4-pp fold out brochure: Clark County Public Health (**CCPH**) **2014 Conserving Food Production ...**

- introducing TDR, PDR, and Ag Production Districts.
- Produced by a Food System Council (CCFSC) with about 10 farmers, including your friend in the Farm Bureau (Zimmerman, Boldt, and Felida Red Barn families) and several small-scale operators and landowners -- ***including several farms inside Cities and UGAs (which are significant losses, IMHO).***
- FSC also had consensus on the map (submitted previously) (***which also failed to acknowledge commercially operating farms, farmland, and operations inside the Cities and UGA***)

GREAT to see the Planning Commission, Agricultural Advisory Commission, and the County Council seriously considering activating these strategies.. available to Clark County for decades... before more cumulative adverse and unmitigatable impacts ensue.

WATER:

Please remember: Clark County has NOT demonstrated Water quantity and water quality impacts of development are mitigated or adequately considered...yet. You might

Revisit the testimony of Richard Dyrland, FOCC, and Wellsave. Where is the burden of using the "best available science"?

1. Public Works seems to have hydrology and water quality expertise -- use them to help -- your consultants for the Plan and DEIS have any watershed expertise?
2. Tribes are where in this Planning process -- re Land Use / Water / etc? Please consult on Bringing important and uniquely relevant expertise to these questions --

Water for Housing is inadequate and a very risky trade-off the Cities and County are apparently making.

For example:

- While Ridgefield (and other Cities) propose new land development for housing etc
- Does Ridgefield actually have adequate Water Rights or water availability for the development plans they have or plan to have. We hear they DO NOT...

The County is responsible for land availability and adequacy to meet housing and employment projection MODELS,

1. Please model water availability?
2. What is the actual recharge from your mapped recharge areas?
3. Has USGS mapped the wells and levels? Has anyone modeled the aquifer to assess current and future capacity?

Scientific principles, and decades of experience across the USA documenting the impacts of urbanization on watershed functions

1. Increased peak floods and discharge levels -- more rainwater is more surface water runoff, and flow peaks are higher, sooner.
2. These higher, more intense peak flows bring more debris, destabilize slopes, clog drains, and overwhelm transportation infrastructure (bridges, culverts, ditches, etc). aka Flooding -- increasing downstream as tributaries merge.

Who is responsible for considering Water in long-range planning and environmental impacts of development pressures?

1. Some may claim that Water (rights, irrigation, allocation...) are issues under the purview of Dept of Ecology,
2. However, Some believe the County is also responsible for ensuring adequate water quantity, groundwater recharge, and availability
3. Water availability for housing is being TAKEN from availability for irrigation and watershed function. Transfer of Water Rights is an issue adjacent and

as considerable as Development Rights

4. The County is charged with documenting, assessing and planning to mitigate adverse impacts -- under the GMA.

Thank you for protecting vital resources -- ever more at risk with climate change.

Hastily submitted, with respect,

Jude Wait, Ph.D.



CONSERVING FOOD PRODUCTION IN CLARK COUNTY

CHECKING IN ON OUR FUTURE



Why conserve food production land in Clark County?

Clark County farms support the local economy

- ▶ Local farms employ more than 4,000 people. Preserving agriculture land provides economic opportunity for new farmers and allows for existing farms to expand, keeping these jobs local.
- ▶ Supporting local farms keeps our money circulating locally.
- ▶ Locally produced food travels shorter distances, reducing transportation costs and carbon footprint while maintaining food quality.
- ▶ Privately-owned and managed agriculture land generates more local tax revenues than it costs in services.

Local food is healthy for people and for land

- ▶ Good farming practices can help preserve clean water and healthy soil.
- ▶ Encouraging the production, distribution, and procurement of food from local farms increases the availability to and consumption of locally produced foods for our community.
- ▶ Maintaining the potential to grow more of our own food helps make us resilient in the event of major emergencies.
- ▶ Local food has a lower risk of causing food-borne illnesses because it spends less time in transit, doesn't change hands as often and is more apt to be processed in small batches.

The rural character of farm land enhances the quality of life

- ▶ A high quality of life is attractive to employers wanting to locate in Clark County.
- ▶ Agricultural land provides habitat for wildlife and allows natural water filtration.
- ▶ Food grown closer to consumers uses less fossil fuels which contribute to pollution, greenhouse gases and emissions, extreme heat days, flooding, drought, deteriorating air quality, and other impacts to human health.

2014



How can food-producing lands be conserved?

Transfer of Development Rights (TDR)

A TDR program is a voluntary, incentive-based, and market-driven approach to preserve land and steer development growth away from lands that have high value for other uses.



A TDR program is based on free-market principles and prices that would motivate landowner and developer participation. Rural landowners realize economic return through the sale of development rights to private developers who are able to build in designated unincorporated urban areas and cities.

A market in development rights allows rural landowners to receive financial compensation without having to sell or fully develop their land. TDR programs enable the transfer of development potential from one parcel of land to another—developers “buy” development rights from agricultural land owners to be used for growth in designated development zones.



Conservation Easements and Purchase of Development Rights (PDR)

A conservation easement is a deed restriction that landowners voluntarily place on part or all of their land. The easement limits development in order to protect the land's natural resources.

An agricultural conservation easement is an easement specifically designed for agricultural land. Agricultural conservation easements can be donated, usually to a non-profit land trust, or sold to a public agency or qualified conservation organization through a PDR program. Some state's PDR programs are administered by the state Department of Agriculture.

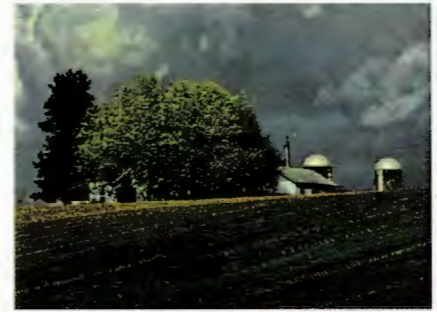
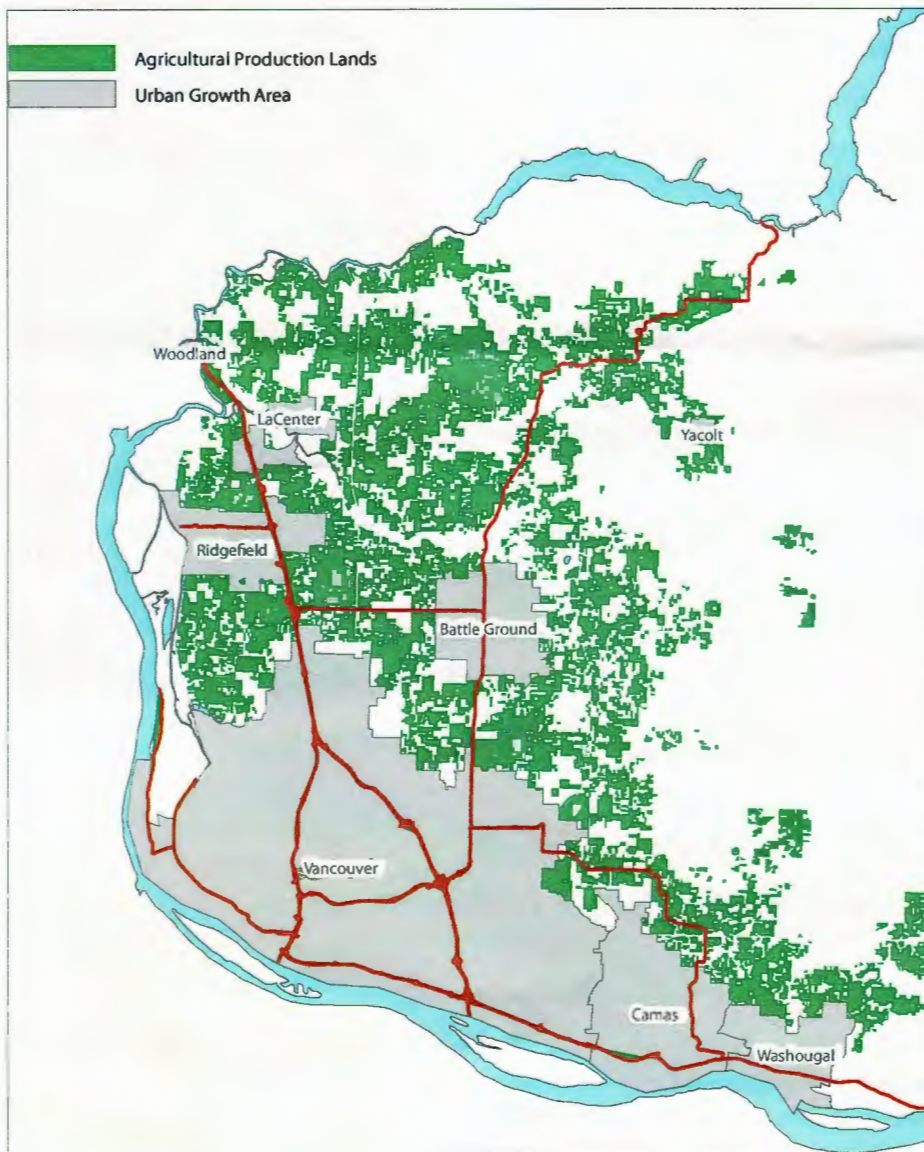
The federal Farm and Ranch Lands Protection Program provides cost-share assistance to states, cities, and land trusts to help fund the purchase of development rights. Landowners can also combine the sale and donation of an agricultural conservation easement through a bargain sale. Through a bargain sale, a landowner sells an easement at less than its fair market value, taking a charitable deduction on the donated portion of the easement.

Whether to donate or to sell an easement, or how much of a donation to make as part of a bargain sale, is often a complex decision that is influenced by a landowner's income level, tax bracket, cost basis in the property, business and/or personal objectives, and the availability of town, state, or federal funding for the purchase of development rights.

Agricultural Production Districts

Agriculture Production Districts are specific geographic areas, regardless of zoning, where farming would be actively supported by the county over the long term.

In the 2009 report released by the Clark County Agriculture Preservation Advisory Committee, a goal of maintaining or aggregating contiguous blocks of land 100-150 acres in size was identified as a desirable goal. An Agricultural Production District may encompass one, or several, of such blocks. These should be considered priority areas for use of tools such as PDR and/or TDR and cluster development concepts to maintain or aggregate larger contiguous blocks of land dedicated primarily to agricultural activities.





WHAT YOU CAN DO TO SUPPORT LOCAL AGRICULTURE AND PROMOTE FOOD PRODUCTION

- ▶ Submit comments on the county website at www.clark.wa.gov/planning/2016update/comments.html.
- ▶ Let your friends and neighbors know about this important issue and encourage them to get involved.
- ▶ Learn more about efforts to promote a healthy food system at www.clark.wa.gov/public-health/about/foodsystemscouncil.html
- ▶ Purchase locally grown and locally produced food as much as possible.

For more information: Please email Theresa.Cross@clark.wa.gov



Public Health
Prevent. Promote. Protect.



Clark County Public Health

Always working for a safer and healthier community

Street Address: 1601 East 4th Plain Blvd., Vancouver, WA 98661

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Telephone: (360) 397-8000

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