

From: [Rebecca Messinger](#)
To: [Cnty 2025 Comp Plan](#)
Cc: [Oliver Orjiako](#); [Jenna Kay](#)
Subject: FW: FOCC Comments, Chapters 1 and 3 of Comp Plan Update Draft
Date: Tuesday, June 30, 2026 8:15:16 AM
Attachments: [2026-06-18 FW Comments on Land Use and Rural Comp Plan Update PC.pdf](#)
[Policy request for your consideration.docx](#)
[image001.png](#)

Good morning,

Please see the email below and attached documents for the record.

Thank you!



Rebecca Messinger
Clerk to the Council
COUNTY MANAGER'S OFFICE

Phone: 564-397-4305
Email: Rebecca.Messinger@clark.wa.gov



From: Ann Foster <annfoster5093@gmail.com>
Sent: Monday, June 29, 2026 5:15 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 <Matt.Little@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Kathleen Otto <Kathleen.Otto@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>; Jenna Kay <Jenna.Kay@clark.wa.gov>
Cc: Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>
Subject: FOCC Comments, Chapters 1 and 3 of Comp Plan Update Draft

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TO: Clark County Council Chair Sue Marshall, Councilor Wil Fuentes, Councilor Michelle Belkot, Councilor Glen Yung, Councilor Matt Little

Cc: County Manager Kathleen Otto, Community Planning Director Oliver Orjiako, Sr. Planner Jose Alvarez, Program Manager Jenna Kay, Rebecca Messinger

Dear Councilors and Staff:

Friends of Clark County is pleased to offer comments on Chapters 1 and 3 of the drafted Comprehensive Plan Update. Chapter 1 addresses the Land Use Element and Chapter 3 addresses the Rural and Natural Resource Element of the plan. FOCC (Friends of Clark County) appreciates the good work in this draft and, in particular, supports the inclusion of those policies and goals that are specific to the mitigation of hazardous climate events and our resilience in the face of climate change, as recommended by the Climate Advisory Group in 2025.

FOCC also acknowledges the comments provided by Director of Planning and Law for Futurewise, Tim Trohimovich, sent to the Planning Commission on June 18 of this year. We have attached Mr. Trohimovich's comments below.

We are in agreement with and support Futurewise's comments regarding Chapters 1 and 3. We are taking this opportunity to reiterate the importance of these comments, and supplement with our own.

First, FOCC has repeatedly, over the past 4 years, stated that, given the population growth data provided by the Department of Commerce and housing and employment requirements, there is no need to expand the urban growth areas in Clark County. Expansion is not needed.

Secondly, FOCC has repeatedly stated that Clark County can not allow UGA expansion onto ag lands of long-term significance. This is a violation of the Growth Management Act (GMA), and this has been made clear to those in decision-making positions many times since 2022 by its own legal counsel and staff, in addition to Friends of Clark County.

We agree with Futurewise's comment on page 2 of its document that the Comprehensive Plan Update's Chapters 1 and 3 should "better protect working farms". Mr. Trohimovich goes into greater detail on page 6. In this paragraph, he reminds us that the GMA REQUIRES us to "assure the conservation of agricultural lands and to assure that the use of adjacent lands does not interfere with their continued use for the production of food or agricultural products". (The legal decision resulted from *King County v. Central Puget Sound Growth Management Hearings Bd. (Soccer Fields)*, again referenced in the Futurewise document.)

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- We add for emphasis that our need to protect, preserve and increase the availability of a local food production segment has become critical

- as we, as a county, continue to lose farms, farmers, and infrastructure to support farming - largely due to the high cost of land, pushed up developers. Our food supply is just as important as our housing supply; all it takes is three days of interruption
- to our food supply chain to learn the impact of empty grocery shelves on our communities.
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- We also emphasize
- that RCW 36.70A.060(5) and Futurewise state that “the GMA requires the transfer of development rights programs to protect agricultural lands”. FOCC strongly supports a transfer of development rights, or similar ag- land protection program, as it is stated
- in the legal framework of the GMA.
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- Note that Chapter 1.1.17, page 26, 4th bullet point, of the Comprehensive Plan Update draft specifically points to the requirement of a
- transfer development right program, or similar agricultural land protection program, in the County’s toolbox for preserving ag land (ag land designated as having long term commercial significance) in accordance with the GMA.
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- As
- a recommendation. FOCC submitted a proposal, attached below, for a
- countywide
- policy that would begin design and development within one year upon the completion of the 2025 Comprehensive Plan Update. That policy recommendation is attached below. We urge the Council to consider addressing that recommendation in its 2025 Comprehensive
- Plan Update.
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Thirdly, we wish to further emphasize concurrency and its importance - that the GMA requires that at minimum, specific levels of service standards for transportation be adopted by local jurisdictions and those development proposals which cannot demonstrate compliance with these adopted service standards be denied. This is quoted from Chapter 1 of the update draft, page 17, line 28 Chapter 1 Land Use Element as submitted by Clark County's Community Planning for review.

Fourth and finally, Friends of Clark County joins Friends of Central Vancouver in recommending the following changes and amendments to those instances in the 2025 Comp Plan Update draft that remove possible opportunities for development of land along the existing PVJR railroad line. These recommendations are:

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- Chapter 1, 1.4 (Strategies), page 32, 5th bullet point, states “develop and adopt plan and Industrial Railroad zoning district consistent
- with land use objectives”. We recommend its deletion OR
- that it is amended to add “while prioritizing environmentally sensitive lands, agricultural lands and forest lands and prohibiting conversion of environmentally sensitive lands, agricultural lands and forest lands”.
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- Chapter 1, (Overlays), page 16, line 39 regarding a Railroad Industrial Overlay option.
- We recommend the deletion
- of a RR Ind Overlay.
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- Any reference to improving, developing, promoting long-term economic opportunity by utilizing the railroad should be amended with the
- following sentence: “while prioritizing environmentally sensitive lands, agricultural lands and forest lands and prohibiting conversion of environmentally sensitive lands, agricultural lands and forest lands”.
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Overall, to Friends of Clark County and to the residents of Clark County, the importance of responsible land-use planning and implementation can not be overstated. This framework

of goals and policies in these two Chapters play a critical role in our resilience to climate change, in our ability to mitigate hazardous climate events, in ensuring a healthy local food supply, in our ability to breathe clean air, in providing open space and natural areas for every member of the community. We look forward to working together to balance these needs with the need for roofs over our heads.

Best regards,

Ann Foster, President
Friends of Clark County



1201 3rd Ave Suite 2200, Seattle, Washington 98101
p. (206) 343-0681
futurewise.org

June 18, 2026

Karl Johnson, Chair
Clark County Planning Commission
Clark County Community Planning
PO Box 9810
Vancouver, Washington 98666-9810

Dear Chair Johnson and Planning Commissioners:

Subject: Comments on the Introduction, Chapter 1 Land Use Element, and Chapter 3 Rural and Natural Resource Element of the Clark County Comprehensive Plan Update

Sent via email: comp.plan@clark.wa.gov; jeffrey.delapena@clark.wa.gov;

Thank you for the opportunity to comment on the Introduction, Chapter 1 Land Use Element, and Chapter 3 Rural and Natural Resource Element of the Clark County Comprehensive Plan Update. Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable, and opportunity-rich communities, and that protect our most valuable farmlands, forests, and water resources. Futurewise has members and supporters across Washington State including in Clark County.

Summary of the Recommendations

Futurewise has the following comments and recommendations on the Introduction, Chapter 1 Land Use Element, and Chapter 3 Rural and Natural Resource Element:

- Futurewise strongly supports including a Tribal Land Acknowledgement that has the agreement of the Tribes and Indian Nations affected by the county comprehensive plan.
- Because urban area expansions are not needed, the Land Use Element and Future Land Use Map cannot expand the urban growth areas (UGAs). Expanding the UGAs would violate the Growth Management Act (GMA). Please see page 2Because urban area expansions are not needed, the Land Use Element and Future Land Use Map cannot expand the urban growth areas (UGAs). of this letter for more information.
- The UGAs must not be expanded onto agricultural lands of long-term commercial significance and the Land Use Element and Future Land Use Map



should designate the “Agricultural Land Base” lands that meet the criteria for agricultural lands of long-term commercial significance as agricultural lands of long-term commercial significance. This is necessary to comply with the GMA. Please see page 3 of this letter for more information.

- The Land Use Element and Future Land Use Map must designate adequate land for affordable housing within the urban growth areas (UGAs). This is necessary to comply with the GMA. Please see page 4 of this letter for more information.
- The Land Use Element and Future Land Use Map should focus these densities and housing units in transit-oriented development locations within the UGAs. This is necessary to comply with the GMA. Please see page 5 of this letter for more information.
- The Land Use Element, the Future Land Use Map, and the Rural Element should better protect working farms. This is needed to better protect working farms. Please see page 6 of this letter for more information.
- A transfer of development rights program cannot be used as an excuse to expand urban growth areas or dedesignate agricultural lands of long-term commercial significance. Please see page 7 of this letter for more information.
- Reduce planned rural growth and capacity. This will help protect the environment and comply with the GMA. Please see page 8 of this letter for more information.

Detailed Recommendations

Comments on the Introduction

Futurewise strongly supports including a Tribal Land Acknowledgement that has the agreement of the Tribes and Indian Nations affected by the county comprehensive plan.

Comments on Chapter 1 Land Use Element

Because urban area expansions are not needed, the Land Use Element and Future Land Use Map cannot expand the urban growth areas (UGAs).

The Washington State Supreme Court wrote “we hold a county’s UGA designation cannot exceed the amount of land necessary to accommodate the urban growth projected by [the Washington State Office of Financial Management] OFM, plus a



reasonable land market supply factor.”¹ A comparison of the total 2023-2045 housing unit needs in the *2025 Population, Housing and Employment Allocation – Issue Paper 5* with the “2023 VBLM Capacity” shows that existing capacity can accommodate or is within a few housing units of accommodating the planned housing growth.² And the cities and unincorporated urban growth areas will likely need to increase their capacity for low-rise multifamily and mid-rise multifamily dwellings to meet the affordable housing requirements which will increase the housing capacity in the cities and unincorporated urban growth areas.³ Further, Vancouver, Camas, and Washougal were required to adopt their new middle housing zoning by December 31, 2025, further increasing their housing capacity.⁴ So, there is no need to expand the county’s urban growth areas. Without a need to expand the urban growth areas, Clark County lacks the legal authority to expand the urban growth areas (UGAs).⁵

The UGAs must not be expanded onto agricultural lands of long-term commercial significance and the Land Use Element and Future Land Use Map should designate the “Agricultural Land Base” lands that meet the criteria for agricultural lands of long-term commercial significance as agricultural lands of long-term commercial significance.

The *Clark County Agricultural Lands Study* documents “that 98 percent of the 101,844-acre Agricultural Land Base (99,900 acres) is classified as having Prime or Statewide Importance soils. A nearly identical share, 96 percent (31,400 acres),

¹ *Thurston Cnty. v. W. Washington Growth Mgmt. Hearings Bd.*, 164 Wn.2d 329, 352, 190 P.3d 38, 49 (2008).

² Clark County Comprehensive Plan 2025 Update Planning for growth 2025 – 2045 *2025 Population, Housing and Employment Allocation – Issue Paper 5* prepared by Community Planning p. 5; Clark County 2025 Allocation based on VBLM and HAPT Method A p. *1 last accessed on June 17, 2026, at: https://clark.wa.gov/sites/default/files/media/document/2024-02/Allocation%20Housing_Method%20A.pdf and at link on the last page of this letter with the filename: “Allocation Housing_Method A.pdf.”

³ Washington States Department of Commerce, Local Government Division Growth Management Services, *Guidance for Updating Your Housing Element: Updating your housing element to address new requirements* p. 36 (Aug. 2023, updated Jan. 2026) last accessed on June 17, 2026, at: <https://www.commerce.wa.gov/growth-management/housing-planning/housing-guidance/> and at the link on the last page of this letter with the filename: “1220_Book2_Housing Element Update_230823_Final_updated 260112.docx.”

⁴ Washing State Department of Commerce Middle Housing Update Deadlines last accessed on April 23, 2026, at: <https://deptofcommerce.app.box.com/s/bv7go3x1h176hwy2lgm8chraykr8ki50> and at the link on the last page of this letter with the filename: “Middle Housing Update Deadlines by Year - Updated May 2025.pdf.”

⁵ *Thurston Cnty. v. W. Washington Growth Mgmt. Hearings Bd.*, 164 Wn.2d 329, 351 – 52, 190 P.3d 38, 48 – 49 (2008).

is found within the existing 32,589-acre Agricultural Designations. This near-universal prevalence indicates that from a soil-capability perspective, the vast majority of lands identified in the study area are physically well-suited for agricultural production.”⁶ The other factors also show that these lands qualify as agricultural lands of long-term commercial significance.⁷ The Land Use Element and Future Land Use Map must retain the existing agricultural lands of long-term commercial significance designation and add the “Agricultural Land Base” that meet the criteria for agricultural lands of long-term commercial significance to the designated agricultural lands of long-term commercial significance.

The 519 acres that Ridgefield and La Center are requesting to pave over forever are prime agricultural lands and farmlands of statewide importance and meet the other criteria for agricultural lands of long-term commercial significance.⁸ Consequently, these lands cannot be legally dedesignated under WAC 365-190-040(10)(c). Since the lands cannot be dedesignated legally, they cannot be legally added to the UGAs unless the land added has been protected for agricultural use through the adoption of a purchase or transfer of its development rights.⁹

In the past Clark County was able to dedesignate agricultural lands of long-term commercial significance that continued to meet the criteria and have them annexed before the Growth Management Hearings Board and the courts found that these dedesignations violated the Growth Management Act. **That is no longer possible because dedesignations and urban growth area expansions do not take effect until after the Growth Management Hearings Board appeals are resolved.¹⁰ So, dedesignations that violate state law are now a waste of time and money as they will be appealed and overturned and cannot be annexed during the appeal period.¹¹**

The Land Use Element and Future Land Use Map must designate adequate land for affordable housing within the urban growth areas (UGAs).

⁶ EConorthwest, *Clark County Agricultural Lands Study* pp. 62 – 63 (Clark County Planning & Development Department: Nov. 2025) last accessed on June 17, 2026, at: <https://clark.wa.gov/sites/default/files/media/document/2025-11/final-agricultural-lands-study-technical-report-2025.11.04-1.pdf> and at the link on the last page of this letter with the filename: “final-agricultural-lands-study-technical-report-2025.11.04-1.pdf.”

⁷ *Id.* pp. 66 – 73.

⁸ *Id.* pp. 62 – 73.

⁹ RCW 36.70A.060(5).

¹⁰ RCW 36.70A.067.

¹¹ RCW 36.70A.067.

RCW 36.70A.070(1) requires that the comprehensive plan “shall” include a land use element [and map] designating the proposed general distribution and general location and extent of the uses of land, where appropriate, for agriculture, timber production, housing, The land use element shall include population densities, building intensities, and estimates of future population growth.” The State of Washington Department of Commerce has documented that to provide housing affordable to families and individuals earning 80 percent or less of the area median income requires low-rise multifamily and mid-rise multifamily housing and potentially accessory dwelling units.¹² To provide housing affordable to families earning more than 80 to 120 percent AMI requires townhomes, duplexes, triplexes, and quadplexes.¹³ These multifamily housing types are urban, not rural or resource lands uses. Given the affordable housing targets applied to the Clark County urban growth areas, the Land Use Element and Future Land Use Map must designate adequate land for affordable housing within the urban growth areas.

The Land Use Element and Future Land Use Map should focus these densities and housing units in transit-oriented development locations within the UGAs.

These housing densities when located with mixed uses along transportation corridors and designed consistent with Transit Oriented Development principles is also an important method of reducing greenhouse gas pollution.¹⁴ So the County can provide for affordable housing and reduce greenhouse gas pollution. This will also help comply with the requirements to reduce per capita vehicle miles traveled (VMT) in RCW 36.70A.070(1) and RCW 36.70A.070(9)(c) and (d)(i)(B) and to reduce greenhouse gas pollution in RCW 36.70A.070(9)(c) and (d)(i)(A). Indeed, the most effective way to reduce per capita VMT is to focus growth into existing

¹² Washington States Department of Commerce, Local Government Division Growth Management Services, *Guidance for Updating Your Housing Element: Updating your housing element to address new requirements* p. 36 (Aug. 2023, updated Jan. 2026) last accessed on June 17, 2026, at: <https://www.commerce.wa.gov/growth-management/housing-planning/housing-guidance/> and at the link on the last page of this letter with the filename: “HB 1220_Book2_Housing Element Update_230823 Final_updated 260112.pdf.”

¹³ *Id.*

¹⁴ Wash. State Dep’t of Commerce Growth Management Services, Clark County 2022 Greenhouse Gas Emissions Analysis p. 26, pp. C-1 – C-2 (v3.5.1) last accessed on June 17, 2026, at: <https://www.commerce.wa.gov/growth-management/climate-planning/climate-policy-tools/> enclosed at the link on the last page of this letter and in a separate email with the filename: “CountyGHGAnalysisReport_Clark_20260123.pdf.”

cities and towns because they allow shorter automobile trips and encourage walking, bicycling, and transit use thereby reducing per capita VMT.¹⁵

The Land Use Element, the Future Land Use Map, and the Rural Element should better protect working farms.

The Growth Management Act requires Clark County “to assure the conservation of agricultural lands and to assure that the use of adjacent lands does not interfere with their continued use for the production of food or agricultural products.”¹⁶ Clark County’s BERK report documents that the 20-acre minimum lot size and non-agricultural uses allowed by the Agriculture (AG-20) comprehensive plan designation and zone fails to conserve agricultural land of long-term commercial significance because they allow “non-productive rural uses.”¹⁷ “Given onsite development or other non-productive rural uses (e.g. dwellings, manicured lawns associated with dwellings, etc.) there is a greater area zoned AG and a lesser area inventoried by [the Washington State Department of Agriculture] WSDA in agricultural use. WSDA inventoried acres make up between 15-27% of the AG 10 zone area [which was zoned AG-20 when the BERK report was written].”¹⁸ The BERK report also found based on the Census of Agriculture that “1.5% of the [Clark County] farms are large, representing 72% of the total commodity outputs. ... The loss of large farms corresponds to a loss in commodity totals. In 2007 dollars, the value of agriculture dropped from \$62.3 million in 1997 to \$52.7

¹⁵ Arthur C. Nelson, *Compact Development Reduces VMT: Evidence and Application for Planners—Comment on “Does Compact Development Make People Drive Less?”*, 83 JOURNAL OF THE AMERICAN PLANNING ASSOCIATION 36 pp. 36 – 38 (2017), DOI: 10.1080/01944363.2016.1246378 enclosed at the link on the last page of this letter with the filename: “Compact Development Reduces VMT Evidence and Application for Planners Comment on Does Compact Development Make People Drive Less.pdf.” The Journal of the American Planning Association is peer-reviewed. Journal of the American Planning Association Instructions for authors webpage enclosed at the link on the last page of this letter with the filename: “JAPA Instructions for Authors June 2017.pdf.”

¹⁶ *King County v. Central Puget Sound Growth Management Hearings Bd. (Soccer Fields)*, 142 Wn.2d 543, 556, 14 P.3d 133, 140 (2000) emphasis in original.

¹⁷ BERK Consulting, *Clark County Comprehensive Plan 2016 Update Planning for Growth 2015 – 2035: Clark County Agriculture and Forest Land Supplemental Mapping and Data Analysis – Issue Paper* 9 p. 18 (June 23, 2016) last accessed on June 17, 2026, at https://www.clark.wa.gov/sites/default/files/dept/files/community-planning/2016-update/Plan%20Adoption/Final%20documents-maps/Issue%20Paper_9_Supplemental%20Resource%20Land%20Info_2016_0623_CLEAN.pdf enclosed at the link on the last page of this letter and in a separate email with the filename: “Issue Paper_9_Supplemental Resource Land Info_2016_0623_CLEAN.pdf.”

¹⁸ *Id.* at p. 18.

million in 2007, and again to \$45.9 million in 2012.”¹⁹ Converting large farms to small farms and 20-acre estates with manicured lawns as the AG-20 zone allows will not conserve agricultural lands and encourage the agricultural economy as the GMA requires. Clark County should increase the minimum lot size to 40 acres and remove the nonagricultural uses from the comprehensive plan designation and zone.²⁰

A transfer of development rights program cannot be used as an excuse to expand urban growth areas or dedesignate agricultural lands of long-term commercial significance.

A transfer of development rights program cannot be used as an excuse to expand urban growth areas or dedesignate agricultural lands of long-term commercial significance.²¹ The GMA requires transfer of development rights programs to protect agricultural lands.²² Interlocal agreements between the County and a city or cities also cannot be used as an excuse to expand urban growth areas or dedesignate agricultural lands of long-term commercial significance. That is because interlocal agreements must comply with state law.²³ Further, interlocal agreements cannot override state law.²⁴

¹⁹ *Id.* at p. 6.

²⁰ Arthur Nelson, *Preserving Prime Farmland in the Face of Urbanization: Lessons from Oregon* 58 JOURNAL OF THE AMERICAN PLANNING ASSOCIATION 467, 471 – 74 (1992) enclosed at the link on the last page of this letter and in a separate email with the filename: “Preserving Prime Farmland in the Face of Urbanization Lessons from Oregon JAPA.pdf.” The Journal of the American Planning Association is a peer-reviewed journal. Journal of the American Planning Association - Instructions for authors webpage pp. 3 – 4 of 9 enclosed at the link on the last page of this letter and in a separate email with the filename: “JAPA Instructions for Authors.pdf.”

²¹ *Orton Farms, LLC, et al. v. Pierce County*, Central Puget Sound Growth Management Hearings Board (CPSGMHB) Case No. 04-3-0007c, Final Decision and Order (Aug. 2, 2004) at pp. 36 – 37, 2004 WL 3275228 pp. *28 – 29 (footnote omitted); *Friends of Agriculture v. Grant County*, Eastern Washington Growth Management Hearings Board (EWGMHB) Case 05-1-0010, Final Decision and Order (March 14, 2006) at p. *10, 2006 WL 1370957 p. *7 quoting from *Orton Farms*; *Town of Friday Harbor, Fred R. Klein, John M. Campbell, Lynn Bahrych, et al. v. San Juan County*, Western Washington Growth Management Hearings Board (WWGMHB) Case No. 00-2-0062c, Order on Compliance and Invalidity Re: Resource Lands Redesignation (March 28, 2002), p. *5, 2002 WL 599680 p. *3 (March 28, 2002) (“we will start with the presumption of validity that would attach to any de-designation of resource lands, examine the record to ensure that it contains sufficient analysis that the appropriate GMA criteria (conservation imperative) was applied, and make our determination based upon the presumption of validity and the record under the clearly erroneous standard.”)

²² RCW 36.70A.060(5).

²³ *Exendine v. City of Sammamish*, 127 Wn. App. 574, 585 fn. 21, 113 P.3d 494, 499 (2005), as amended on denial of reconsideration (May 31, 2005), publication ordered (June 6, 2005).

²⁴ *Id.*



That transfer of development rights programs cannot justify urban growth area expansions is particularly true where there is no need to expand the urban growth areas as was documented above.

Comments on Chapter 3 Rural and Natural Resource Element

Reduce planned rural growth and capacity.

Not including rural population increases in the comprehensive plan and rural element would help reduce per capita VMT and greenhouse gas pollution.²⁵ Rural residents have substantially higher greenhouse gas emissions, particularly higher transport-related direct greenhouse gas emissions, than residents in the urban growth areas.²⁶ The transport-related direct emissions of rural residents are three times those in the inner city, and 1.5 times those in the suburbs.²⁷ So reducing rural growth will help protect the environment.

Thank you for considering our comments. If you require additional information, please contact me at telephone 206-343-0681 or email: tim@futurewise.org.

Very Truly Yours,

Tim Trohimovich, WSBA No. 22367
Director of Planning & Law

²⁵ Arthur C. Nelson, *Compact Development Reduces VMT: Evidence and Application for Planners—Comment on “Does Compact Development Make People Drive Less?”*, 83 JOURNAL OF THE AMERICAN PLANNING ASSOCIATION 36 pp. 36 – 38 (2017), DOI: 10.1080/01944363.2016.1246378.

²⁶ Jeffrey Wilson, Jamie Spinney, Hugh Millward, Darren Scott, Anders Hayden, and Peter Tyedmers, *Blame the exurbs, not the suburbs: Exploring the distribution of greenhouse gas emissions within a city region* 62 ENERGY POLICY 1329, pp. 1334 – 35 (2013) enclosed at the link on the last page of this letter and in a separate email with the filename: “Blame_the_exurbs_not_the_suburbs_Explori.pdf.” Energy Policy is a peer reviewed journal. Energy Policy Guide for authors webpage p. *14 last accessed on Feb. 3, 2026, at: <https://www.sciencedirect.com/journal/energy-policy/publish/guide-for-authors> and enclosed at the link on the last page of this letter and in a separate email with the filename: “Guide for authors - Energy Policy.pdf.”

²⁷ Jeffrey Wilson, Jamie Spinney, Hugh Millward, Darren Scott, Anders Hayden, and Peter Tyedmers, *Blame the exurbs, not the suburbs: Exploring the distribution of greenhouse gas emissions within a city region* 62 ENERGY POLICY 1329, p. 1335 (2013).



Re: Comments on the Introduction, Chapter 1 Land Use Element, and Chapter 3
Rural and Natural Resource Element of the Clark County Comprehensive Plan
Update

June 18, 2026

Page 9

Enclosures at this link:

<https://futurewiseorg.sharepoint.com/:f:/g/IgAIkOZVzGs9QYtZ5F3NHbVpAfX-lUuvva5bsIfPoIDLFgA?e=ynGxNB>

Policy request for your consideration

11 messages

Ann Foster <annfoster5093@gmail.com>

Mon, Apr 20, 2026 at 7:16 PM

To: Sue Marshall <sue.marshall@clark.wa.gov>, Glen Yung <glen.yung@clark.wa.gov>, "michelle.belkot@clark.WA.Gov" <michelle.belkot@clark.wa.gov>, Matt Little <matt.little@clark.wa.gov>, "wil.fuentes@clark.WA.Gov" <Wil.fuentes@clark.wa.gov>, Kathleen Otto <kathleen.otto@clark.wa.gov>, "Orjiako, Oliver" <oliver.orjiako@clark.wa.gov>, Jose Alvarez <Jose.Alvarez@clark.wa.gov>

Dear Council Chair Marshall, Councilor Yung, Councilor Belkot, Councilor Fuentes, Councilor Little, County Manager Otto, Community Planning Director Orjiako and Sr. Planner Alvarez:

As part of the 2025 Comprehensive Plan Update, Friends of Clark County is requesting your consideration of the following policy:

In order to coordinate effective land use plans with development, Clark County shall implement a county-wide Farmland Protection program whose objective shall remain the perpetual conservation and protection of designated agricultural resource land Clark County-wide.

A Farmland Protection Program such as: a Transfer of Development Rights (TDR), a Purchase of Development Rights (PDR), a farmland mitigation (exchange) program, or similar tools, shall include the following elements:

- Begin initial design and development as soon as practicable following the completion of the 2025 Comprehensive Plan Update, but no later than 12 months following the completion of the Update.
- One of the main purposes of the Farmland Protection Program is to guide the identification of "sender" and "receiver" areas for the entire county. Therefore, the County will not engage in any de-designation process as part of the 2025 Comprehensive Plan Update.
- Charging the Agricultural Advisory Commission with the task of creating a parallel and concomitant process that is focused on developing, and adopting, a methodology to designate additional Agricultural Lands of Long Term Commercial Significance identified by the recent County-Wide Agricultural Lands Resource Study.
- The Farmland Protection Program is to be initiated by the county and include such cities interested in implementing this program, and who have signed an interlocal agreement with Clark County, and shall also include input from special districts such as the Agricultural Advisory Commission, the Clark Conservation District and the Columbia Land Trust.
- The establishment of a working advisory team to identify specific goals and scope, project timeline, and community outreach strategies.

- Begin and remain within Clark County's Community Planning Department.

Transfer Development Rights programs, or the framework for such programs, have been used in 8 other counties and 21 cities within Washington State. These counties are King (a clear success story), Whatcom, Kitsap, Thurston, Pierce, Kittitas, Snohomish and Skagit. Worth noting here:

Snohomish County: (DP-32) Jurisdictions should encourage the use of transfer of development rights (TDR), purchase of development rights, and conservation incentives. The objective is to focus growth in the Urban Growth Areas while lessening development pressure on rural and resource areas. Specific steps regarding TDR's include:

- a. Designating additional TDR sending and receiving areas;
- b. Developing zoning incentives to use TDR in urban areas not already designated as receiving areas;
- c. Coordinating efforts to establish a regional TDR program; and
- d. Ensuring that an area designated as a TDR receiving area by the County remains a receiving area after annexation or that the city provides an equivalent capacity for receiving TDR certificates elsewhere in the city when the County and the affected cities have adopted an interlocal agreement addressing the TDR program.