From: Bart Catching
To: Jeffrey Delapena
Cc: sathalberg@gmail.com
Subject: FW: public comment for Ag Commission
Date: Friday, September 4, 2026 3:45:32 PM

Jeff,
Please add Mr. Thalberg's comment below as a general comprehensive plan comment for the record.
Thank you,

Bart Catching
Planner III
COMMUNITY PLANNING

564.397.4909

From: Steve Thalberg <sathalberg@gmail.com>
Sent: Friday, September 4, 2026 3:42 PM
To: Bart Catching <Bart.Catching@clark.wa.gov>
Subject: Re: public comment for Ag Commission

sure.
thx.

On 9/4/2026 3:35 PM, Bart Catching wrote:

> Steve,
> I will forward this to the Ag Commission.
> Do you want this as a general Comprehensive Plan update comment as well?
>
> **Bart Catching**
> Planner III
> COMMUNITY PLANNING
>
> 564.397.4909

From: Steve Thalberg <sathalberg@gmail.com>
Sent: Friday, September 4, 2026 3:26 PM
To: Bart Catching <Bart.Catching@clark.wa.gov>
Cc: Sue Marshall <Sue.Marshall@clark.wa.gov>
Subject: public comment for Ag Commission

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Hi Bart,

Please forward this to the members of the Ag Commission.

Last night, I observed the Planning Commission's (PC) meeting, where they approved many items for the Comprehensive Growth Managment (CGM) Plan.

It was very disheartening!

1. The PC voted to approve multiple Urban Growth Boundary (UGB) revisions that de-designated agriculture (Ag) zoned lands for Battle Ground, Ridgefield, Yacolt, and other cities, and also approved de-designation of multiple other Ag zoned lands on a parcel basis.

2. The PC voted to approve the following 1.1.24 TDR language:

1.1.24 Clark County and participating cities shall work cooperatively to adopt a countywide transfer of development rights (TDR) program to support mutually agreed upon conservation goals (i.e., the preservation of agricultural lands) and require that any expansion of any urban growth boundary shall require participation in the program. When Clark County expands an urban growth boundary contingent upon the use of the TDR program, the county and the participating city shall enter into an interlocal agreement that, at a minimum, includes the following provisions:
• Establishing requirements for completing expansions to the urban growth boundaries contingent upon the transfer of development rights from eligible sending areas designated by the county to the receiving areas created by the expansion.
• Setting timelines for full implementation of the transfer of development rights program and any requirements or limitations placed on the expansion area until such a time as a TDR program is implemented.
• Identifying guidelines for monitoring, reporting, and reassessing

market conditions.

But there is no deadline for implementing the TDR progam, thus Ag lands can be de-designated without a concurrent TDR for new Ag lands, and there is no 1:1 ratio for de-designated Ag lands and institution of TDR Ag lands. This will result in loss of Ag lands in the county.

3. Commissioner Alicia LeDuc-Montgomery proposed the following TDR motion, as it would:

a. protect the county against future lawsuits for not following the State CGM Act,

b. set a deadline of 12/31/2027 to establish a TDR plan for the county,

c. have a 1:1 ratio for Ag acreage de-designated:TDR for Ag acreage,

d. preserve Ag lands in the county.

LeDuc-Montgomery's motion was:

1.1.24 Clark County and participating cities shall cooperatively adopt and implement a countywide transfer of development rights ("TDR") program to permanently conserve agricultural lands while accommodating the urban growth adopted through the 2025 Comprehensive Plan Periodic Update.

UGA expansions that include de-designated agricultural lands shall be subject to an urban holding designation until applicable TDR requirements are satisfied. The County and affected city shall enter into an interlocal agreement establishing TDR requirements, implementation responsibilities, conservation objectives, and timelines. The countywide TDR program shall be fully operational no later than December 31, 2027.

The program shall ensure the permanent conservation of at minimum one acre of agricultural land for each acre of designated agricultural land converted through UGA expansion, while also ensuring no net loss of agricultural resource lands resulting from adopted UGA acreage or planned housing, population, or employment capacity resulting from implementation of the TDR program. The program shall include a mechanism for identifying and evaluating rural lands for suitability of designation or re-designation as agricultural resource lands.

If sufficient TDR credits are unavailable or if the TDR program is not operational by the implementation deadline, the County and affected city shall use purchase or transfer of development rights, permanent conservation easements, or another mechanism providing substantially equivalent permanent agricultural conservation. Failure, delay, or insufficient participation in the TDR program shall not result in removal, reduction, or reversion of an adopted UGA expansion or a reduction in its planned urban capacity.

Future UGA expansions involving designated agricultural resource lands shall participate in the TDR program and provide permanent agricultural conservation at a minimum 1:1 acreage ratio, or provide an alternative mechanism achieving substantially equivalent permanent agricultural conservation.

Unfortunately, her motion failed 2-5. Only Commissioner Ron Barca joined

LeDuc-Montgomery in supported the motion.

The loss of Ag lands in the county is progressing at a rapid rate, with no or very little constraints.

Adoption of the PC's TDR is a death sentence for agriculture in the county: Development will run rampant and unchecked.

Adoption of a Public Benefit Rating System (PBRS) is even more important now that the Planning Commission seems to have very little concern for the loss of Ag lands.

The Farm Conservation portion of the PBRS is not the only part of the PBRS that should be recommended by the Ag Commission to the County Council, as many farmers could get an additional 30% reduction in taxes from points accrued in other classifications (critical habitat, parks and recreation, historic/archaeologic, and other) and their subclass/resource.

I had submitted recommendations, on several occasions, to the PC that they:

1. add a recommendation for the adoption of a PBRS to chapter 4, the Environmental Element, to the county's proposed Comprehensive Growth Management Plan, particularly sections 4.3, 4.4, 4.5 and 4.10.2. They didn't even consider this.
2. add a recommendation for the Environmental Impact Statement portion of the CGM Plan that a PBRS would dovetail nicely with HB1181, which encourages tree crown cover, reduction of greenhouse gases, improvement in air and water quality and enhances the quality of life of residents, as: trees benefit long-term health of the local neighborhood citizens, improve neighborhood value, decrease summertime energy use and costs, and have an unmatched positive benefit-cost ratio.
3. consider disapproval of the changes to the UGB requested by the various cities, as those changes will result in loss of Ag lands.

Unfortunately, the PC didn't even consider the above considerations.

Summary:
The PC acted in a very pro-development and anti-Ag manner, which is detrimental to the county and will result in urban sprawl.

The Ag Commission should send a strongly worded recommendation to the County Council to:

1. NOT approve the PC's TDR,
2. consider approving LeDuc-Montgomery's TDR plan,
3. if there is no TDR adopted, then further de-designation of Ag lands should not occur,
4. if there is no TDR adopted, then deny changes to the various cities' requests to their UGB,
5. recommend approve of the PBRS to the County Council,
6. act in accordance with WA State rules and regulations regarding infringement on and de-designation of Ag lands.

Sincerely,
Steve Thalberg
Resident, unincorporated Clark County