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October 29, 2015

Gordy Euler  
Clark County Community Planning  
PO Box 9810  
Vancouver, WA 98666-9810



Re: Rural Industrial Land Bank – Sanitary Sewer Service

Dear Mr. Euler,

A request has been made to address the District's ability to provide sanitary sewer service to the proposed Rural Industrial Land Bank (RILB) in the Brush Prairie area. Based on the flow estimates presented in the document titled "Inventory of Possible Industrial Land Bank Sites", the District has the capacity to serve this area, both in terms of collection system capacity and treatment capacity.

The area on the east side of State Route 503 is currently within the area covered by the District's Comprehensive General Sewer Plan, and as such there is a defined plan to serve the area. This plan was originally adopted by the District in 2006 and subsequently approved by both Clark County and the Washington State Department of Ecology.

The area on the west side of State Route 503 can be served as shown in Appendix 3 of the Addendum to the 2007 Comprehensive Plan EIS. A map of the proposed service is included with this letter.

If you have any questions, or need further clarification, I can be reached by e-mail at [sbacon@crwwd.com](mailto:sbacon@crwwd.com) or by phone at 360.993.8810.

Regards,

A handwritten signature in blue ink, appearing to read "Steve Bacon". The signature is fluid and cursive.

Steve Bacon  
Development Program Manager



Clark County Railroad Advisory Board  
PO Box 5000  
Vancouver, WA  
98666-5000

November 4, 2015

Board of Clark County Councilors  
The Hon. David Madore, Chair  
The Hon. Jeanne Stewart  
The Hon. Tom Mielke  
PO Box 5000  
Vancouver, WA  
98666-5000

Dear Councilors:

The Clark County Railroad Advisory Board (RRAB) makes recommendations to County staff and the Board of County Councilors (BOCC) to improve the economic use of the County's railroad, and to explore other possible uses beneficial to the citizens of Clark County. The RRAB is grateful to the Councilors for their interest in and support of the Chelatchie Prairie Railroad.

The RRAB has consistently maintained that having available, development-ready industrial properties adjacent to the railroad is a top priority to generate a return on the taxpayers' investment in the railroad. Rail-related industrial development improves the economic utilization and output of the railroad, enabling opportunities for essential employment for the County and its citizens, particularly family wage jobs in traded sectors. Rail-served industrial employment lands remain in short supply and high demand in the Portland-Vancouver Metropolitan Region, resulting in lost opportunities to attract and site regionally-significant employers.

Accordingly, the RRAB supports the designation of a rural industrial land bank on the Lagler/Ackerland properties, per the applicants' land use submittal to the county, which has been the subject of an ongoing analysis by county staff and consultants. This site presents a

significant opportunity to create needed jobs for Clark County citizens closer to home, making use of a unique asset/site feature: Clark County's Chelatchie Prairie Railroad.

Pending BOCC approval of the application, by Clark County code the subject properties would be zoned light industrial or IL (see 40.560.010(J)(2)(a)(2) and 40.560.010(J)(2)(b)(2)). Since the Chelatchie Prairie Railroad traverses the docket site to the west of SR 503 (known as the "Ackerland Property"), this alignment naturally lends itself to railroad use. **The RRAB strongly urges the BOCC to take all of the following actions in its approval of the rural industrial land bank application:**

- 1) In addition to the uses included in the light industrial zoning code (IL), include the following approved uses from the railroad industrial zoning code (IR) as permissible on the Ackerland properties to encourage rail-related development:

Table 40.230.085-1. Uses				
2012 North American Industrial Classification System (NAICS)				
B. Manufacturing Uses				
	321	Wood product manufacturing		
		3211	Sawmills and wood preservation	
		3212	Veneer, plywood, and engineered wood product manufacturing	
	322	Paper manufacturing		
		3221	Pulp, paper and paperboard mills	
	327	Nonmetallic mineral product manufacturing		
		3273	Cement and concrete product manufacturing	
			327310	Cement manufacturing
			327320	Ready-mix concrete manufacturing
		3274	Lime and gypsum product manufacturing	
		3279	Other nonmetallic mineral product manufacturing	
	331	Primary metal manufacturing		
	332	Fabricated metal product manufacturing		
		3328	Coating, engraving, heat treating, and allied activities	
			332813	Electroplating, plating, polishing, anodizing, and coloring
E. Transportation and warehousing				
	488	Support activities for transportation		
		4883	Support activities for water transportation	

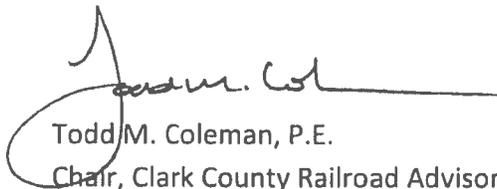
2) Adopt the following language as applicable to the Ackerland properties:

*"Applicants for development shall submit a rail use plan showing where they could build a spur track that will connect with the main line. A rail use plan does not apply if an applicant can show there is an existing track or spur. Development shall not preclude the extension of any spur track." (see also Clark County Code, 40.230.085(D)(2)(e))*

These policies will help to ensure the subsequent industrial uses of the subject properties capitalize on the available railroad infrastructure.

We appreciate the opportunity to serve our community and advise the BOCC on these important matters. We look forward to continuing to provide input to you and other community partners on this and other important economic development matters.

Very truly yours,



Todd M. Coleman, P.E.  
Chair, Clark County Railroad Advisory Board



Daniel Weaver  
Vice-chair, Clark County Railroad Advisory Board

cc Steve Horenstein, Horenstein Law Group  
Mark McCauley, Clark County Manager  
Oliver Orjiako, Clark County Community Planning  
Gordy Euler, Clark County Community Planning  
Jeff Swanson, Clark County Economic Development

November 19, 2015

The Honorable David Madore, Chair  
The Honorable Jeanne Stewart  
The Honorable Tom Mielke  
Board of Clark County Councilors  
P.O. Box 5000  
Vancouver, WA 98666-5000

Dear Clark County Councilors:

The Columbia River Economic Development Council (CREDC) supports policy recommendations that ensure Clark County has an adequate supply of employment-ready land consistent with the strategies outlined in the 2011 Clark County Economic Development Plan.

To that end, CREDC supports the preservation and development of office- and industrial-zoned land in the County. In particular, rail-served industrial employment lands remain in high demand and short supply in the Greater Portland Metropolitan Statistical Area, resulting in lost opportunities to attract and retain regionally significant employers.

The designation of a rural industrial land bank would help to support the development of industrial and rail-served land in the County and is consistent with CREDC's employment land policy.

We appreciate your attention to this important economic development matter and appreciated the opportunity to weigh in on this issue.

Sincerely,



Mike Bomar  
President, CREDC



December 14, 2015

Mr. Steve Morasch, Chair  
Clark County Planning Commission  
Clark County Community Planning  
PO Box 9810  
Vancouver, Washington 98666-9810

Dear Chair Morasch and Planning Commission Members:

**Subject: Comments on the proposed Rural Industrial Land Bank for the Planning Commission's December 17, 2015 public hearing.**

Sent via email to: [comp.plan@clark.wa.gov](mailto:comp.plan@clark.wa.gov); [gordon.euler@clark.wa.gov](mailto:gordon.euler@clark.wa.gov)

Thank you for the opportunity to comment on the proposed Rural Industrial Land Bank. We urge the Planning Commission to recommend denial of the Rural Industrial Land Bank because it is unneeded and will pave over a working farm.

Futurewise is working throughout Washington State to create livable communities, protect our working farmlands, forests, and waterways, and ensure a better quality of life for present and future generations. We work with communities to implement effective land use planning and policies that prevent waste and stop sprawl, provide efficient transportation choices, create affordable housing and strong local businesses, and ensure healthy natural systems. We are creating a better quality of life in Washington State together. We have members across Washington State including Clark County.

**The Rural Industrial Land Bank is unneeded because land suitable to site the major industrial development is available within the Clark County's existing urban growth areas and therefore the Rural Industrial Land Bank violates the Growth Management Act (GMA)**

The Growth Management Act (GMA), in RCW 36.70A.365(2)(h), provides that one of the requirements for a "major industrial development" is that "[a]n inventory of developable land has been conducted and the county has determined and entered findings that land suitable to site the major industrial development is unavailable within the urban growth area." RCW 36.70A.367(2)(b)(i) applies this requirement to major industrial developments with master planned locations. The *Addendum* identifies land suitable for major industrial development in the existing urban growth areas.<sup>1</sup> Consequently, the Rural Industrial Land Bank cannot be approved at this time

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<sup>1</sup> *Clark County Rural Industrial Land Bank Programmatic Environmental Review pursuant to RCW36.70A.367(2)(b), and Addendum to the Clark County Comprehensive Growth Management Plan*

Mr. Steve Morasch, Chair Clark County Planning Commission  
Subject: Rural Industrial Land Bank Comments  
December 14, 2015  
Page 2

and, therefore, a Rural Industrial Land Bank on any of the non-urban growth area sites will violate the Growth Management Act.

### **There is enough land in the County's UGAs to accommodate the County's planned residential and job projections**

The most recent *Clark County Buildable Lands Report* documents that there is more than enough land in the County's urban growth areas (UGAs) to accommodate the County's planned employment growth. The *Clark County Buildable Lands Report* states:

In 2014, the Board of County Commissioners chose to plan for a total of 91,200 net new jobs. The County has an estimated capacity of 101,153 jobs as follows: The 2015 VBLM [Vancouver Buildable Lands Model], indicates a capacity of 76, 978 jobs. The cities of Battle Ground, La Center, and Ridgefield, have indicated they have additional capacity to accommodate 16, 755 jobs. Publicly owned land is not included in the model, therefore we assume that the 7,400 new public sector jobs estimated by ESD [State of Washington Employment Security Department] will occur on existing publicly owned facilities.<sup>2</sup>

So there is no need for the Rural Industrial Land Bank. The Planning Commission should recommend denial of this proposal.

### **The Rural Industrial Land Bank is unneeded because Commercial and Light Industrial is already located in this area**

Not only is there enough land in the UGAs, but Commercial and Light Industrial land is already located west and south of the proposed Rural Industrial Land Bank. The existing Vancouver urban growth area is also just south of the site. While this proposal is being sold on the grounds that rural residents could easily drive to jobs on the new site, there are already opportunities for jobs in this area. So again, the Rural Industrial Land Bank is unneeded.

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*Final Environmental Impact Statement* (October 2015) pages 13 and 14 of the *Addendum Part I: Inventory* accessed on Dec. 14, 2015 at: <http://www.clark.wa.gov/planning/landbank/>. Hereinafter referred to as the *Addendum*.

<sup>2</sup> *Clark County Buildable Lands Report* p. 11 (June 2015) accessed on Dec. 14, 2015 at: [http://www.clark.wa.gov/thegrid/documents/061015WS\\_2015BUILDABLE\\_LANDS\\_REPORT.pdf](http://www.clark.wa.gov/thegrid/documents/061015WS_2015BUILDABLE_LANDS_REPORT.pdf) and enclosed with the paper original of Futurewise's October 16, 2015 letter commenting on the *Addendum*.

## **The proposed Rural Industrial Land Bank qualifies as agricultural lands of long-term commercial significance and should be conserved**

The proposed Rural Industrial Land Bank is Area VB from the County's illegal 2007 attempt to dedesignate this agricultural land.<sup>3</sup> Area VB was found to be illegally dedesignated by both the Growth Management Hearings Board and Clark County Superior Court.<sup>4</sup> The "County passed an ordinance redesignating parcels BC, VB, and the portions of parcels CA-1 and RB-2 that were not purportedly annexed, as [agricultural lands of long-term commercial significance] ALLTCS."<sup>5</sup> So this land qualified, and as the *Addendum's* analysis shows, continues to qualify as agricultural lands of long-term commercial significance.<sup>6</sup> And this land continues to have an Agriculture comprehensive plan designation.<sup>7</sup>

Agriculture had long-term commercial significance in Clark County. Income from farm-related sources is up sharply in Clark County, increasing from \$4.2 million in 2007 to \$5.98 million in 2012. This is an increase of 41 percent, a much larger percentage increase than the Washington State increase of 27 percent.<sup>8</sup> Between 2007 and 2013, the average market value of products sold per farm increased five percent from \$25,079 to \$26,367.<sup>9</sup> Clark County farmers rank second in Washington State in the number of "broilers and other meat-type chickens" they are raising.<sup>10</sup> The Clark County Food System Council reports that "in the past 5 years Clark County has seen an increase in the number of Community Supported Agriculture programs, growth in

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<sup>3</sup> See *Comprehensive Growth Management Plan NE Vancouver UGA – Map 1 Deliberation Components* and *Comprehensive Growth Management Plan NE Vancouver UGA – Map 2 Deliberation Components* enclosed with the paper original of Futurewise's October 16, 2015 letter commenting on the *Addendum*.

<sup>4</sup> *Clark Cnty. Washington v. W. Washington Growth Mgmt. Hearings Review Bd.*, 161 Wn. App. 204, 220, 254 P.3d 862, 868 (2011) *vacated in part Clark Cnty. v. W. Washington Growth Mgmt. Hearings Review Bd.*, 177 Wn.2d 136, 298 P.3d 704 (2013). This portion of the decision was not vacated.

<sup>5</sup> *Id.*

<sup>6</sup> *Addendum* Appendix B: Agricultural Lands Analysis pages 7 – 10.

<sup>7</sup> County/UGA Comprehensive Plan Clark County, Washington accessed on Oct. 14, 2015 at:

[http://www.clark.wa.gov/planning/comp\\_plan/documents/AmendComplan\\_2013.pdf](http://www.clark.wa.gov/planning/comp_plan/documents/AmendComplan_2013.pdf)

<sup>8</sup> United States Department of Agriculture, National Agricultural Statistics Service, *2012 Census of Agriculture Washington State and County Data Volume 1 • Geographic Area Series • Part 47 AC-12-A-47 Chapter 2: County Level Data, Table 6. Income from Farm-Related Sources: 2012 and 2007 p. 261* (May 2014) accessed on Dec. 14, 2015 at:

[http://www.agcensus.usda.gov/Publications/2012/Full\\_Report/Volume\\_1\\_Chapter\\_2\\_County\\_Level/Washington/](http://www.agcensus.usda.gov/Publications/2012/Full_Report/Volume_1_Chapter_2_County_Level/Washington/) and a copy of *2012 Census of Agriculture Washington State and County Data Volume 1* was enclosed with the paper original of Futurewise's October 16, 2015 letter commenting on the *Addendum*.

<sup>9</sup> US Department of Agriculture National Agricultural Statistics Service, *2012 Census of Agriculture County Profile Clark County, Washington p. \*1* accessed on Dec. 14, 2015 at:

[http://www.agcensus.usda.gov/Publications/2012/Online\\_Resources/County\\_Profiles/Washington/cp53011.pdf](http://www.agcensus.usda.gov/Publications/2012/Online_Resources/County_Profiles/Washington/cp53011.pdf) and enclosed with this letter.

<sup>10</sup> *Id.*

the number of farmers markets, and more interest in locally sourced and organically grown food.”<sup>11</sup> So farming and ranching has economic value for Clark County.

Washington State Department of Agriculture’s *Washington Agriculture Strategic Plan 2020 and Beyond* documents the need to conserve existing agricultural lands to maintain the agricultural industry and the jobs and incomes the industry provides.<sup>12</sup> As the strategic plan concludes “[t]he future of farming in Washington is heavily dependent on agriculture’s ability to maintain the land resource that is currently available to it.”<sup>13</sup> The *Addendum* discloses that this land is current available to agriculture and in fact is currently being farmed.<sup>14</sup> Globalwise, Inc. concluded that “[o]ne of the key obstacles in Clark County is the limited access to high quality agricultural land at an affordable cost.”<sup>15</sup> As both this letter and the *Addendum* have documented, the site of the proposed Rural Industrial Land Bank is high quality agricultural land.<sup>16</sup>

The Rural Industrial Land Bank proposal is simply an attempted end run around the fact that this land qualifies as agricultural land of long-term commercial significance and so cannot be included in the urban growth area. We urge the Planning Commission to recommend denial of this proposal. If there was a needed to expand the UGA or provide sites outside the UGAs for major industrial developments, which there is not, there are sites that are not agricultural lands of long-term commercial significance that could be paved over.

### **The proposed Rural Industrial Land Bank qualifies as “Clark County's Best Farm Land” and should be conserved**

The Clark County Food System Council has identified all of the proposed Rural Industrial Land Bank and much of the land in its vicinity as “Clark County’s Best Farm Land.”<sup>17</sup> The Clark County Food System Council identified this land “by looking at

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<sup>11</sup> *Promoting Agricultural Food Production in Clark County*, A proposal developed by the Clark County Food System Council p. 2 (November 2013) accessed on December 14, 2015 at: [http://www.clark.wa.gov/Planning/aging/documents/14-0218\\_FSC\\_PP.pdf](http://www.clark.wa.gov/Planning/aging/documents/14-0218_FSC_PP.pdf) and enclosed in a separate email.

<sup>12</sup> Washington State Department of Agriculture, *Washington Agriculture Strategic Plan 2020 and Beyond* pp. 50 – 52 (2009) accessed on Dec. 14, 2015 at: <http://agr.wa.gov/fof/> and enclosed with the paper original of Futurewise’s October 16, 2015 letter commenting on the Addendum.

<sup>13</sup> *Id.* at p. 50.

<sup>14</sup> *Addendum Appendix B: Agricultural Lands Analysis* p. 37.

<sup>15</sup> Globalwise, Inc., *Analysis of the Agricultural Economic Trends and Conditions in Clark County*, *Washington* Preliminary Report p. 48 (Prepared for Clark County, Washington: April 16, 2007) accessed on Dec. 14, 2015 at: [http://www.clark.wa.gov/planning/comp\\_plan/documents/final\\_ag\\_analysis\\_prelim\\_report.pdf](http://www.clark.wa.gov/planning/comp_plan/documents/final_ag_analysis_prelim_report.pdf).

<sup>16</sup> *Addendum Appendix B: Agricultural Lands Analysis* pages 7 – 10.

<sup>17</sup> *Promoting Agricultural Food Production in Clark County*, A proposal developed by the Clark County Food System Council p. 4 (November 2013).

Mr. Steve Morasch, Chair Clark County Planning Commission

Subject: Rural Industrial Land Bank Comments

December 14, 2015

Page 5

characteristics of the land that make it suitable for food production.”<sup>18</sup> These included soils with land capability 1 through 4 soils, land that is flat and rolling, lands that have at least four acres outside the buffers around stream habitats, and “lands that are currently zoned for agriculture or rural residences. ... [They] excluded lands that are tax exempt because they are owned by churches, land trusts, or governments.”<sup>19</sup>

This is another reason that this land should be conserved. The Planning Commission should recommend denial of this proposal.

### **The Addendum does not identify reasonable mitigation measures and so violates the Washington State Environmental Policy Act (SEPA) and the Growth Management Act (GMA)**

An environmental impact statement (EIS), including an addendum, must identify reasonable mitigation.<sup>20</sup> The GMA, in RCW 36.70A.365(2)(a), requires that the “[n]ew infrastructure is provided for and/or applicable impact fees are paid ...” for the Rural Industrial Land Bank. But the *Addendum’s* discussion of mitigation measures on page 26 of the *Addendum Part II: Alternative Sites Analysis* includes no information on how the new infrastructure will be provided or how the impact fees the county charges will be updated to include the considerable costs of the needed infrastructure. Nor are any systems development changes discussed for providing water and sewer service is not available at this site.

Similarly, RCW 36.70A.365(2)(f) requires that “[p]rovision” must be “made to mitigate adverse impacts on designated agricultural lands, forest lands, and mineral resource lands[.]” But again, the *Addendum* does not include this required mitigation. Given that these properties are agricultural lands of long-term commercial significance and are adjacent to agricultural lands of long-term commercial significance this is a significant deficiency.

The failure to identify mitigation violates both the Washington State Environmental Policy Act (SEPA) and the GMA. This is other reason the Planning Commission should recommend denial of the Rural Industrial Land Bank.

Thank you for considering our comments. If you require additional information please contact me at telephone 206-343-0681 Ext. 118 and email [tim@futurewise.org](mailto:tim@futurewise.org)

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<sup>18</sup> *Id.* p. 5.

<sup>19</sup> *Id.*

<sup>20</sup> WAC 197-11-440(6)(a).

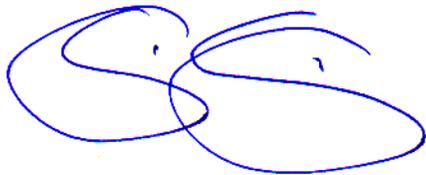
Mr. Steve Morasch, Chair Clark County Planning Commission

Subject: Rural Industrial Land Bank Comments

December 14, 2015

Page 6

Very Truly Yours,

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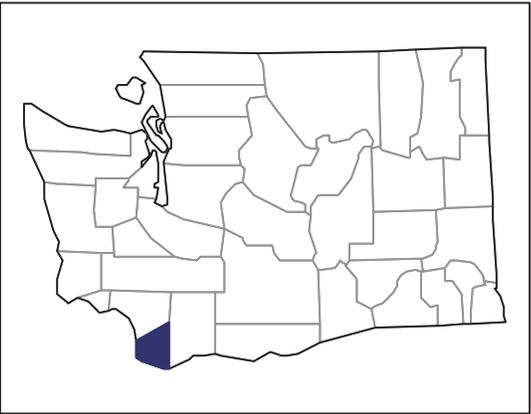
Tim Trohimovich, AICP

Director of Planning & Law

Enclosures

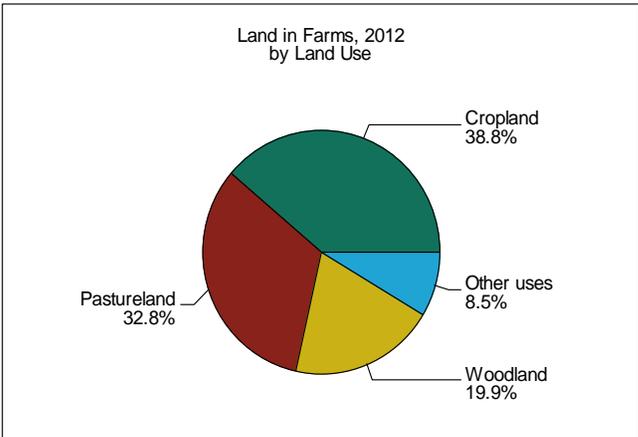
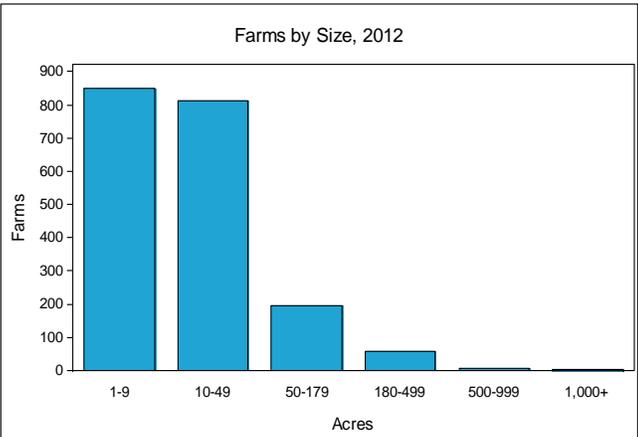
# 2012 CENSUS OF AGRICULTURE

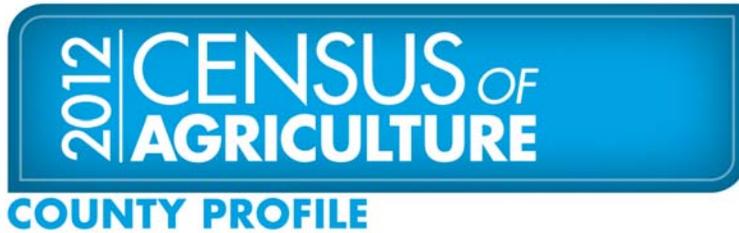
## COUNTY PROFILE



### Clark County Washington

	2012	2007	% change
<b>Number of Farms</b>	1,929	2,101	- 8
<b>Land in Farms</b>	74,758 acres	78,359 acres	- 5
<b>Average Size of Farm</b>	39 acres	37 acres	+ 5
<b>Market Value of Products Sold</b>	\$50,861,000	\$52,691,000	- 3
Crop Sales \$18,856,000 (37 percent)			
Livestock Sales \$32,005,000 (63 percent)			
Average Per Farm	\$26,367	\$25,079	+ 5
<b>Government Payments</b>	\$293,000	\$115,000	+ 155
Average Per Farm Receiving Payments	\$6,359	\$3,397	+ 87





## Clark County – Washington

### Ranked items among the 39 state counties and 3,079 U.S. counties, 2012

Item	Quantity	State Rank	Universe <sup>1</sup>	U.S. Rank	Universe <sup>1</sup>
<b>MARKET VALUE OF AGRICULTURAL PRODUCTS SOLD (\$1,000)</b>					
Total value of agricultural products sold	50,861	23	39	1,757	3,077
Value of crops including nursery and greenhouse	18,856	24	39	1,738	3,072
Value of livestock, poultry, and their products	32,005	16	39	1,248	3,076
<b>VALUE OF SALES BY COMMODITY GROUP (\$1,000)</b>					
Grains, oilseeds, dry beans, and dry peas	489	27	34	2,401	2,926
Tobacco	-	-	-	-	436
Cotton and cottonseed	-	-	-	-	635
Vegetables, melons, potatoes, and sweet potatoes	(D)	(D)	39	(D)	2,802
Fruits, tree nuts, and berries	6,838	14	39	171	2,724
Nursery, greenhouse, floriculture, and sod	5,691	12	38	394	2,678
Cut Christmas trees and short rotation woody crops	(D)	3	33	(D)	1,530
Other crops and hay	2,735	19	39	1,062	3,049
Poultry and eggs	7,774	9	39	659	3,013
Cattle and calves	8,002	18	39	1,471	3,056
Milk from cows	14,525	12	30	403	2,038
Hogs and pigs	(D)	(D)	37	(D)	2,827
Sheep, goats, wool, mohair, and milk	309	9	39	536	2,988
Horses, ponies, mules, burros, and donkeys	749	9	39	345	3,011
Aquaculture	(D)	26	34	(D)	1,366
Other animals and other animal products	361	14	39	532	2,924
<b>TOP CROP ITEMS (acres)</b>					
Forage-land used for all hay and haylage, grass silage, and greenchop	17,541	14	39	1,112	3,057
Corn for silage	2,181	8	24	733	2,237
Land in Berries	1,086	5	39	42	2,339
Cut Christmas trees	696	3	33	69	1,557
Wheat for grain, all	570	25	32	1,835	2,537
<b>TOP LIVESTOCK INVENTORY ITEMS (number)</b>					
Broilers and other meat-type chickens	420,614	2	36	410	2,723
Cattle and calves	16,169	19	39	1,523	3,063
Layers	13,548	9	39	654	3,040
Pullets for laying flock replacement	3,565	8	38	464	2,637
Horses and ponies	3,104	6	39	187	3,072

### Other County Highlights, 2012

Economic Characteristics	Quantity	Operator Characteristics	Quantity
Farms by value of sales:		Principal operators by primary occupation:	
Less than \$1,000	718	Farming	682
\$1,000 to \$2,499	373	Other	1,247
\$2,500 to \$4,999	306	Principal operators by sex:	
\$5,000 to \$9,999	216	Male	1,483
\$10,000 to \$19,999	112	Female	446
\$20,000 to \$24,999	55	Average age of principal operator (years)	59.0
\$25,000 to \$39,999	47	All operators by race <sup>2</sup> :	
\$40,000 to \$49,999	15	American Indian or Alaska Native	33
\$50,000 to \$99,999	37	Asian	33
\$100,000 to \$249,999	22	Black or African American	-
\$250,000 to \$499,999	3	Native Hawaiian or Other Pacific Islander	5
\$500,000 or more	25	White	2,953
Total farm production expenses (\$1,000)	54,736	More than one race	29
Average per farm (\$)	28,375	All operators of Spanish, Hispanic, or Latino Origin <sup>2</sup>	82
Net cash farm income of operation (\$1,000)	2,398		
Average per farm (\$)	1,243		

See "Census of Agriculture, Volume 1, Geographic Area Series" for complete footnotes, explanations, definitions, and methodology.

- Represents zero. (D) Withheld to avoid disclosing data for individual operations.

<sup>1</sup> Universe is number of counties in state or U.S. with item. <sup>2</sup> Data were collected for a maximum of three operators per farm.

**From:** [Karen Wood](#)  
**To:** [Wiser, Sonja](#)  
**Cc:** [Euler, Gordon](#)  
**Subject:** RILB Comments for 12/17/15 Planning Commission Meeting  
**Date:** Tuesday, December 15, 2015 4:25:07 PM

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I previously commented on the Rural Industrial Land Bank on April 22, 2015, via an email to Gordon Euler, which I see is included in the open house comments posted on the RILB webpage for that meeting. This email is for the December 17, 2015, Planning Commission meeting to reiterate my previous comments. I do not support the proposed RILB.

In addition to attending the April 22, 2015, open house, I attended the open houses on July 29, 2015, and October 29, 2015, and have reviewed the materials posted on the RILB webpage. I have not heard or seen any information that mitigates my concerns about turning the Lagler and Ackerland properties into an industrial area. If anything, the Master Plan, showing large areas of open water and wetlands, underscores how much of the properties are wetland soils and how expensive it will be to develop, for a small number of jobs. I think there are better places in Clark County for industrial development and there is no need to designate the Lagler and Ackerland properties as an RILB. I don't think dedesignation from AG-20 to IL is justified, especially knowing that the properties are prime farmland soils.

I hope my April 22 comments and those of others submitted prior to the SEPA, at open houses and otherwise, will be considered in the Planning Commission's deliberations.

Karen Wood  
14910 NE 46th St  
Vancouver, WA 98682

## Comments on the Rural Land Bank Proposal for the public hearing on December 17, 2015

As you consider the proposal to de-designate yet another large block of prime agricultural land of long-term commercial significance, please reflect on the following counter proposals. Either way, **please do not grant the Rural Industrial Land Bank proposal** to develop yet another 600 acres of farmland.

1. The Agricultural De-designation Appendix formulates a draft Agricultural Land Bank proposal. Long-term commercially significant agriculture is variously mapped and described.
2. The only way to abide by the intent of the GMA **to keep the land in agriculture is to keep the land in agriculture; it's that simple**. With all due respect to current, past, and future farming operations, de-designation is not justifiable.
3. All the sites could represent potential Agricultural Production Districts.
  - a. There are of course other neighborhoods in Clark County that would be still suited for such districting as well.
  - b. In such regions, various policy and economic development tools can be used to support the infrastructure and other needs of the agriculture community and its beneficiaries.
  - c. All residents of the region and all participants in the food system benefit, in the long run, when farmland is conserved, along with critical areas, ecosystem services, and other natural resources.
  - d. Farmers benefit as well, as the infrastructure and sector capacity is better maintained, adapted, and implemented.
  - e. It is very heartening that these four areas you have cursorily analyzed have a “majority of land in current use taxation,” further documenting their agricultural significance, and current use.
4. See also the Food System Council map for Agricultural Land Bank and Production Districts.
5. Please refer to the 2009 Agricultural Preservation Committee report. The County’s food system resilience would be greatly enhanced if farmers were supported in overcoming the barriers and challenges, as outlined clearly with recommended solutions in the 2009 report. Food security depends on all of the food system, and is not just pertaining to the emergency food system and direct marketing venues. There are many ways to support farmers.
6. Farmers both young and old want to stay or start farming here! All sizes of operations are needed, and a diversity of products are indeed feasible to produce here, a fact supported by the numbers and diversity of farming operations. Farmers are using various site class lands as well. And they need more land, not less, larger parcels, not smaller.
7. This is indeed some of the most valuable farmland in the County, as it is relatively large enough for a commercially viable mid-size farm! The infrastructure is there, there are a diversity of farms, and operations in the areas, including both leased and owned farmland. The GMA specifies keeping enough infrastructure to ensure viable agricultural commerce.
8. The sector is still viable, and the land is still available and being farmed. Please do not de-designate farmland or potential farmland. There are many farmers looking for more land to farm, whether they are younger operations or multi-generational businesses. Let’s make them all feel welcome and supported.

Thanks for your time and consideration for supporting farming and farmland preservation in Clark County. Such efforts are sadly way past due. Thank you, Clark County, for developing a justification for an Agricultural Production Zone for the agricultural and rural lands a much-needed area wide study.

Respectfully submitted,  
Jude Wait, food farm resilience researcher

**From:** [Jude Wait](#)  
**To:** [Wiser, Sonja](#); [Euler, Gordon](#)  
**Subject:** Rural Land Bank  
**Date:** Wednesday, December 16, 2015 8:00:04 AM  
**Attachments:** [Rural Land Bank comments to PC for 17dec2015\\_ph.docx](#)

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Clark County Planning Commission

c/o Sonja WiserClark County Community Planning  
[sonja.wiser@clark.wa.gov](mailto:sonja.wiser@clark.wa.gov)

Dear Planning Commission & Board of County Commissioners,

Attached please find comments to the Planning Commission for the 17 December public hearing.

Please do not recommend de-designation of any more prime farmland of long term commercial significance for agriculture. Please instead recommend an Agricultural Land Bank and Agricultural Production Districts.

As such efforts would take time, building on the work done for the de-designation process and by the Food System Council, the current RILB proposal would cause cumulative long term adverse impacts. As we would lose another large area of agriculturally productive land. Please recommend denial at this time for the RILB.

Thanks for considering the future of food farming in Clark County.

Respectfully,  
Jude Wait



December 16<sup>th</sup>, 2015

Mr. Steve Morasch, Chair  
Clark County Planning Commission  
Clark County Community Planning  
PO Box 9810  
Vancouver, Washington 98666-9810

Dear Chair Morasch and Planning Commission Members,

Subject: Comments on the proposed Rural Industrial Land Bank for the Planning Commission's December 17<sup>th</sup>, 2015 Public Hearing.

Thank you for the opportunity to comment on the proposed Rural Industrial Land Bank. **We respectfully urge the Planning Commission to recommend denial of the Rural Industrial Land Bank.**

We lose almost an acre of farmland every minute in the United States. American Farmland Trust works to prevent conversion of this precious resource by supporting policies to protect farmland from development. Maintaining our agricultural land base is critical to feeding our growing population and to providing the ecosystem services required for a healthy environment. Once farmland is paved over for development, we can never get it back. Our members come from all over Washington State, including Clark County.

The agricultural economy is significant in Clark County. In 2012, the market value exceeded \$50 million. However, we are seeing a decrease in the number of farms and the land in farms (decrease of 8% and 5% respectively from 2007 to 2012).<sup>1</sup> **The proposed Rural Industrial Land Bank is a step in the wrong direction. It would result in the loss of even more farmland.**

According to *Addendum B: Agricultural Land Analysis*, 99% of the proposed site contains prime soils. Prime farmland soils have the best physical and chemical properties for most kinds of agriculture, requiring less water, fertilizers, and pesticides. They are the easiest soils to keep healthy, farm profitably, and grow the widest variety of crops with the least environmental impact. These soils are a limited natural resource; they cannot be replaced. Furthermore, The *Clark County Buildable Lands Report* found that the County's urban growth areas have sufficient land to accommodate the County's planned employment growth. It does not make sense, nor does it follow the intent of the Growth Management Act, to convert land that is actively being farmed to industrial use. **We urge the Planning Commission to recognize that this land has properties that make it particularly well suited for agricultural use and that it deserves to maintain its current designation. Please deny the proposed Rural Industrial Land Bank.**

Thank you for your consideration. Please do not hesitate to contact us via telephone 206-860-4222 or e-mail [kdelavan@farmland.org](mailto:kdelavan@farmland.org) if you have any questions.

Sincerely,

  
Heidi Eisenhour  
Regional Director

  
Kate Delavan  
Policy and Planning Manager

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<sup>1</sup> USDA (2012). *2012 Census of Agriculture County Profile, Clark County, Washington*

**From:** [Dianne Kocer](#)  
**To:** [Wiser, Sonja](#)  
**Subject:** Rural Industrial Land Bank  
**Date:** Thursday, December 17, 2015 2:29:42 AM

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To All Members of the Planning Commission:

There are only a few things vital to human survival. We cannot afford to leave water and food to chance. The proposed Rural Industrial Land Bank designation for the Lagler Property is a poor choice for that prime farmland. That property has been a dairy for decades. As such it has never been polluted by industrial wastes, herbicides or pesticides. Instead it has been organically fertilized by the presence of dairy cows. It is likely the best farm land in all of Clark County. It's close proximity to the urban area makes it even more desirable. A great deal of food can be raised on over 600 acres, with little loss of use for minimal, gravel roads as needed. The consultants hired to propose a plan for development of this property as a RILB indicated that about half of the property could either not be used for development or would be paved for streets and parking. The land will be lost for any future as farmland.

We take for granted that our food will always appear on a daily basis in the grocery store....often from thousands of miles away. Any emergency, especially a long emergency, could/would interfere with that supply chain. It is incumbent upon our community to plan ahead....more than a year or two....but for decades. Just as we look out to the future to plan for water supply, we must do that for food.

The County Council has irresponsibly chosen an option that will have a chilling effect on agricultural development as larger tracts are subdivided in random areas throughout the county. That will be incompatible with agriculture. The Lagler property is in close proximity to other larger tracts currently in use as ag land. Smart, far-sighted planners would know that our community needs to become more self-sustaining. It makes sense to support our vibrant farmers' markets which provide fresh, good quality food right in our back yard.

I urge you to recommend against designating these two large tracts, currently used as a dairy farm, as RILB. It would be nice to see visionary, creative leaders in this county. I hope you will set that example.

With Regards,

Dianne Kocer  
Brush Prairie, WA

Friends of Clark County  
PO Box 513  
Vancouver, WA 98642  
Friendsofclarkcounty.org

To:  
Oliver Orjiako, Director Community Planning  
Gordy Euler, Project Head Planner  
Clark County Planning Commission  
Board of County Councilors  
Kathy Schroader

UPDATE ON FOCC POSITION ON THE INDUSTRIAL LAND BANK (ILB)  
For the record for the Planning Commission Hearing of 12/17/15

The master plan: The work of landowner Dennis Lagler and County staff on the Master Plan for the Industrial Land Bank (ILB) has created a master plan that raises the level of such plans. The neighbors and critical areas have 100-foot buffers. The owner will continue to own the land until it is sold and developed. While the County historically sold plots on a first-come/first permit basis, the landowner can and intends to use criteria such as job quality and relevance to the railroad.

De-designating agricultural land: Our continuing concern is the de-designation of close to 600 acres of prime agriculture (AG) land. The GMA mandate to protect AG lands stands in the way of this de-designation, and the WWGMHB may disallow one or both parcels.

Our position is that the de-designation should be refused unless there<sup>is</sup> some replacement of this large amount of AG land and/or creation of a way for citizens to protect other agriculture lands. We refer to and support input from the several agriculture groups that are giving input and also the work of the three citizen committees that have made specific recommendations in their reports: The Rural Lands Task Force, The Rural Lands Study and the Agriculture Preservation Strategies.

Sincerely,  
Sydney Reisbick, President

Friends of Clark County

## Schroader, Kathy

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**From:** Coyote Ridge Ranch <coyoteridge@tds.net>  
**Sent:** Thursday, December 17, 2015 2:57 PM  
**To:** Schroader, Kathy  
**Subject:** RILB

Val Alexander

2404 NW Coyote Ridge Rd.

La Center, WA 98629

To:

Oliver Orjiako, Director Community Planning

Gordy Euler, Project Head Planner

Clark County Planning Commission

Board of County Councilors

Kathy Schroader

For the record for the Planning Commission Hearing of 12/17/15

Dear Councilors, Staff and Planning Commission,

As a rural landowner, farmer and board member of Friends of Clark County, I want to ask that you reflect on the long term result of de-designating some of the finest ag land in Clark County. I can understand the situation that Dennis Lagler has with his parcel, but I'm hoping that you will find a way to help him, and yet save much of this land to provide food for our county residents. It is large enough that huge amounts of produce could grow there to supply our grocery stores in case of earthquake, the loss of the CRC and being cut off from trucking from California, where most of our produce comes from, except for that grown locally. One of the limiting factors in growing food here and keeping it in the county is the lack of a processing plant. We used to have the Robinson Cold Storage on NE 10<sup>th</sup> Ave, Ridgefield. The plant is still there, but being used for a winery now.

It would be helpful if some of the Lagler property could be used for a place for farmers to take their produce for freezing or canning and keep the money here in Clark County. I know of one berry farmer who has to take her produce to the Willamette Valley for processing and I assume most others do too. The berries grown in the Woodland bottoms would also be a good potential for such an endeavor.

I'm hoping that your priorities will be for the future and not for a short term break that will cost us all. Let's use up the other industrial land first.

Thank you,

Val Alexander

Valerie Alexander  
Coyote Ridge Ranch  
2404 NW Coyote Ridge Rd.  
La Center, WA 98629  
Phone & Fax: 360-263-2521  
cell: 360-607-8797  
[coyoteridge@tds.net](mailto:coyoteridge@tds.net)