

McCall, Marilee



CP16#0244

WAIT / COVER OF 4
PAGE ATTACHMENT

From: Wait, Judith Ann <judith.wait@email.wsu.edu>
Sent: Monday, September 01, 2014 9:58 PM
To: Cnty 2016 Comp Plan
Subject: Scoping comments Comp Plan EIS
Attachments: Clark Co Comp Plan EIS scoping Jude Wait comments 1 sept 2014.pdf

From: Wait, Judith Ann
Sent: Monday, September 1, 2014 4:44 PM
To: Euler, Gordon
Subject: Scoping comments Comp Plan EIS

Gordy,

Happy Labor Day.

Attached are my comments. Thanks for accepting them via email.

Respectfully,

Jude Wait

I am submitting comments per the Scoping process for the SEIS on the Comprehensive Growth Management Plan for Clark County. First, the comment period is way too short given the one working day between the last Open House and the deadline which falls on Labor Day.

While my comments should not be seen as representing the views of anyone but me, they may indeed be agreeable to other residents, food system stakeholders, farmers, and other planning process participants such as a newly formed food system task force. I am a food system researcher focused on the resilience of food farming for regional food security. I have reviewed documents pertinent to Clark County, nearby Counties in Oregon and Washington, and literature (both gray and peer-reviewed) addressing food and farming systems issues across North America and internationally.

While Clark County is understudied, its current policy-makers are notoriously perceived as pro-development in a County with rampant sprawl and a lack of support for farmers. This perception and other forces probably further the degradation of commercially viable agricultural production. I suggest the County strive to use the Comp Plan update and EIS processes to remedy the situation in reality. First, the current condition needs to be reanalyzed using current information, starting with the reports released since 2007, and by conducting additional research and analyses. I have joined a task force that will further these goals, as such a process should not be led by one consultant hired by the County. (Please see also the comments from Food System CARE.) Nor can the County be solely in charge of public engagement. The County should instead focus on doing its job per the intent of the GMA and environmental mandates, including more adequate outreach and timeframes for public input. The County can partner with independent citizen task forces might not be trusted to take the lead.

As a COMPREHENSIVE Growth Management plan, the plan should incorporate and reference other documents and information. Given new information, evaluation of the last seven years, and a more concerted effort to assess agricultural protection, the EIS as well should cover water quality and quantity, fish and wildlife, Legacy Lands (Environmental_Services_Dept, 2014), parks and recreation, ecosystem and resource conservation, watershed management plans, public health, Smart Growth.

The EIS should address *cumulative impacts* of rapid urbanization given past actions (implemented, leading to direct and consequential impacts) and proposed actions.

The impacts of the last Plan update can now be reanalyzed with hindsight to what has transpired with respect to jobs, land use, economic development, business viability, and other issues. Current data should be obtained, ground-truthed and analyzed. Results could drive the updated plan and environmental analyses.

For Clark County's comprehensive plan and EIS, the following topics should be added or expanded to help address the food system within the comprehensive plan: "Land Use Element

- Agriculture and urban agriculture
- Community gardening
- Healthy food access
- Transportation

Element • Healthy food access and distribution Housing Element • Healthy housing Economic Development Element • Local food distribution and sales • Procurement Human Development Element • Community food security • Food assistance programs • Emergency planning • Coordination of joint planning and services Environment Element • Environmental impacts of the food system” (Puget_Sound_Regional_Council, 2012).

Also, recommendations for policy and action priorities, as well as the kinds of data informing policy and agri-food system strategies (modeled after Fisher & Roberts, 2011) should be considered for implementation in the Comp Plan, a food system element perhaps, and the applicable environmental analyses (jobs, health, economics, food waste and the environment, environmental protection, Parks & Recreation, transportation, public safety, emergency response, etc.). Once a baseline of data is established, policies in place (and those of the past), future actions include monitoring progress over time. Evaluation criteria should address farm preservation and agri-food system resilience. The County should consider indicators found in State and municipal publications (Fisher & Roberts, 2011; Office_of_Farmland_Preservation, 2009).

Furthermore, please fully consider the economic and environmental values of agriculture (http://be.futurewise.org/p/salsa/web/blog/public/?blog_entry_KEY=7013 as well social infrastructure. Clark County should PLAN to rank high on the County Scorecards applied to Puget Sound Counties (Canty, Martinsons, & Kumar, 2012) and conduct fund a foodshed study (such as in Hoopenboom, Sloane, & Canty, 2012).

The County should do something to mitigate the admitted impacts such as “The incremental loss of farmland impacts the continued viability of farming, making it more difficult to sustain the role this sector plays within the life of Clark County. It also impacts the other values that are associated with farm land, including open space and scenic values” (Final EIS for the Comprehensive Growth Management Plans of Clark County... 2007). Furthermore, consider more fully the impacts on habitat, ground water recharge, impervious surfaces, watershed changes such as increased flood potential, etc.

What does it mean that “Land proposed for conversion to urban uses consists of agricultural districts (about 4,600 acres), urban reserve (about 3,000 acres), and rural residential (about 4,000 acres). About 3,200 acres would be industrial, commercial, or employment center lands” (FEIS 2007)? Are there agricultural districts? Agriculture should be considered an ‘employment’ center, along with associated businesses and infrastructure.

What has the County done towards “rural land mitigation could include: County designations of a larger portion of the undeveloped rural lands with soils identified by SCS as prime agricultural and forest lands as resource lands, regardless of lot size; Incentives (e.g., transfer or purchase of development rights) and strict development regulations to discourage construction of residences on subdivided resource lands; [and] Adopt “No net loss” policies for rural designations” (FIES 2007, page 72/123)?

Please consider agricultural land preservation and economic development as being on the same side, in contrast to the FEIS language “Balance goals e.g. economic development versus agricultural land preservation” (page 15/123). How can the assessment of agricultural lands have been completed “prior to plan adoption” but not be assessed in the FEIS? Were individual farms asked about their viability?

How was “the incremental loss of farmland impacts the continued viability of farming, making it more difficult to sustain the role this sector plays within the life of Clark County. It also impacts the other values that are associated with farm land, including open space and scenic values” analyzed, and were the impacts mitigated (FEIS page 40/123)?

Please include urban agriculture in the Parks & Recreation and Open Space network plans. UA provides multiple benefits generally falling within ‘quality of life’ categories.

What kinds of input to Comp Plan do neighborhood associations have? Were they contacted?

How much land is in agricultural production and active farming? How much is left? How much is needed to ensure food security and long term commercial viability?

An agricultural and food production element is warranted, especially given the likelihood of a natural disaster such as earthquake or flood that disrupts the food distribution system. As well, climate change is impacting food production around the world, so the more self-sufficient a region, the more resilient. Diversification and multiple sources can also help build resilience.

Agriculture needs its own element or at least consider and highlight Ag issues in each element. Such as housing development, transportation, etc.

Water supply, quality, and access are key issues in the context of commercially viable agricultural production. As well, adequate supplies of clean water for domestic use, fish and wildlife, should be analyzed in the context of the EIS and Comp Plan. A monitoring plan should be added to the County’s Coordinated Water System Plan (Clark County Water Utility Coordinating Committee, 2011) which furthers the goal of compliance with the Non-point Source permit to Clark County from the Dept. of Ecology (Clark County, 2012).

References (included as integral to Scoping comments).

- Canty, D., Martinsons, A., & Kumar, A. (2012). Losing Ground: Farmland Protection in the Puget Sound Region: American Farmland Trust.
- Clark County. (2012). NPDES Municipal Stormwater Annual Report <http://www.clark.wa.gov/water-resources/documents-monials.html>. Washington: Clean Water Program; Environmental Services.
- Clark County Water Utility Coordinating Committee. (2011). Coordinated Water System Plan Update: Regional Supplement (pp. 233).
- Environmental Services Dept. (2014). Clark County Conservation Areas Acquisition Plan: Legacy Lands Program.

- Fisher, A., & Roberts, S. (2011). Community Food Security Coalition Recommendations for Food Systems Policy in Seattle.
- Hoopenboom, A., Sloane, E., & Canty, D. (2012). Planting the Seeds: Moving to More Local Food in Western Washington. In A. F. Trust (Ed.), (pp. 46). Seattle, WA.
- Office_of_Farmland_Preservation. (2009). Washington State Farmland Preservation Indicators. In Washington_State_Conservation_Commission (Ed.).
- Puget_Sound_Regional_Council. (2012). Integrating Food Policy in Comprehensive Planning: Strategies and Resources for the City of Seattle. Seattle.