

**Schroader, Kathy**



**From:** Michele Wollert <michelewollert@gmail.com>  
**Sent:** Wednesday, September 16, 2015 7:31 PM  
**To:** Cnty 2016 Comp Plan  
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Councilors Stewart, Mielke, and Madore:

I join Slow Food Southwest Washington in expressing my concerns about the impact of Alt2 and Alt4 in your GMA Update. Both options parcelize the rural landscape with broad strokes that do not consider the impacts to current or future economically viable farms.

Especially alarming is how Alt. 2 and Alt. 4 eliminates, in one broad sweep, the current AG 20 zoning replacing it with AG-5 and AG-10 and creating smaller lots of 1, 2.5 and 5 acres lots in the rural area. Large acreage zoning can protect farmland for the long term when the parcel size is 20 acres or greater.

***American Farmland Trust fact sheet on zoning as a means of protecting agricultural land explains – ... “ordinances that allow construction of houses on lots of 1-5 acres often hasten the decline of agriculture by allowing residences to consume far more land than necessary.”***

Below are listed five citizen led reports on conserving agriculture in Clark County that should provide direct guidance on the Board of Clark County Councilors direction for protecting agricultural resource land as mandated by the Growth Management Act. One of many common recommendations is to create Agricultural Production Districts that cluster large acreage farms.

Alt 2 and Alt 4 fuel the speed of fragmenting agricultural land and increasing rural residential parcels reduces the amount of land available for farming and will threaten local food security. It will undermine our agricultural heritage and weaken the economic viability of farming in Clark County.

Why large acreage farms are important for long term retention of local agriculture:

- The per acre cost of farmland goes up with smaller acreages – contrary to what some may think the per acre cost more than doubles when you go from a 20 acre parcel to a 10 acre parcel and even higher with 5, 2.5 and 1 acre parcels where you can be looking at a 10 fold increase in the per acre cost. Alt. 2 and 4 would make land for farming prohibitively expensive for economically viable farms.
- Large blocks of land dedicated to farming provide more long term stability and resilience for agriculture. You can plant an orchard - a 50 plus year investment with some predictability that you won't lose your investment.
- Large block farming can support necessary agricultural infrastructure – shared storage, equipment, processing, marketing etc. There is an important economic cluster of supporting jobs that occurs with larger scale farming.

- Dry land farming is feasible in Clark County but it requires larger acreage to be economically feasible with a more limited variety of crops. As new water rights are not available it behooves us to preserve the remaining large acreage farms for diversity of crops and the future resiliency of food production in the county.

#### Population Assumptions Don't Support Alt. 2 and Alt. 4

- Total population growth was revised downward by nearly 7,000 from the previous Comprehensive Plan of 2007.
- Development occurs disproportionately in the rural areas. Contrary to the planning assumption of a 90% urban/10% rural population split – Alt 2 and Alt 4 would allow 16% and 24% of the growth to occur in the rural areas respectively.

#### Sprawling Effect of Alt. 2 & 4 = Inefficient Use of Resources

- Water Resources – new rural lots would require additional wells and septic systems. Experiencing one of the driest summers on record it is short-sighted indeed to be cavalier in proposing to encourage additional 8,220 to 12,400 new wells to tap into the Troutdale aquifer that supplies drinking water to 95% of the population in Clark County.
- Our current transportation system would not support the needed roads to accommodate the growth that would occur across the rural portions of Clark County.
- 34,000 acres would be impacted under Alt. 2 and 65,000 acres impacted under Alt. 4 – impacts would be cumulative to surface and ground water and fish and wildlife resources.

#### What the Draft Supplemental Environmental Impact Statement Says About Alt 2 & Alt 4

- Will require new roads, greater maintenance, longer commutes, and consume more energy.
- New parcels will be spread all over the county.
- Diminishes the county's ability to attract large scale agriculture.
- Creates more housing than is needed.
- **Would not support state regulations to control sprawl.**
- New transportation facilities and maintenance would fall to the county with the cost only partially recovered through impact fees.
- EIS concludes that the cost for Alt 2 and 4 would be prohibitive.
- Needed infrastructure – power lines, schools, support services would change the character of rural Clark County.

**Alt. 2 and Alt. 4 are costly alternatives that reduce the long term future of agriculture in our community and should be rejected out of hand.**

These citizen led reports on conserving agriculture in Clark County should provide guidance on the Board of Clark County Councilors direction for protecting agricultural resource land as mandated by the Growth Management Act:

**Analysis of the Agricultural Economic Trends and Conditions in Clark County, Washington April 2007**

[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)

**Clark County Agriculture Preservation Strategies Report March 2009**

<http://www.clark.wa.gov/planning/RuralLands/documents/2009%20APAC%20AgPreservationStrategiesReport.pdf>

**Rural Lands Task Force Recommendations March 2010**

[http://www.clark.wa.gov/planning/rurallands/documents/10-0310\\_RLTF-RecommendationsReport.pdf](http://www.clark.wa.gov/planning/rurallands/documents/10-0310_RLTF-RecommendationsReport.pdf)

**Promoting Agricultural Food Production in Clark County, NOV 2013**

<http://www.clark.wa.gov/public-health/about/documents/FSCProposalDraft.pdf>

I urge you to reject Alternative 2 and 4.

Thank you for considering our vulnerable family farms.

Michele Wollert  
Vancouver WA