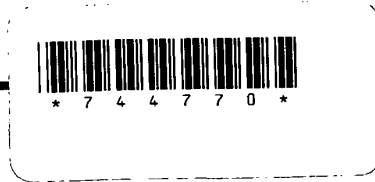


**Schroader, Kathy**



**From:** Orjiako, Oliver  
**Sent:** Thursday, September 17, 2015 2:06 PM  
**To:** Schroader, Kathy  
**Cc:** Cook, Christine  
**Subject:** FW: comments on Draft Supplemental EIS  
**Attachments:** Comments DSEIS 9.17.15.doc

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Just FYI and for the record. Thanks.

---

**From:** Sue Marshall [mailto:suemarshall5@hotmail.com]  
**Sent:** Thursday, September 17, 2015 2:03 PM  
**To:** Cnty 2016 Comp Plan; Stewart, Jeanne; Mielke, Tom; Madore, David  
**Cc:** Orjiako, Oliver; Euler, Gordon; Anderson, Colete; Alvarez, Jose  
**Subject:** comments on Draft Supplemental EIS

Sept. 17, 2015

Dear Clark County Council and Planning Commission:

Thank you for the opportunity to comment on the proposed alternatives for the county comprehensive plan update. I urge you to support either Alt. 1 or Alt. 3 as the options that are the least impactful to the rural community and future viability of agriculture in Clark County.

**BACKGROUND**

Our family bought our 30 acre farm in 1960. We do not have a water right and are dry land farmers. The farm has been in a number of crops starting with a 4,500 tree pear orchard. We converted to berries when market forces compelled us to bulldoze the bulk of the orchard. We currently lease 25 acres to a neighboring farmer who grows grass seed. When the lease is up in 2 years and with a daughter now interested in farming, we will plan to plant filberts, grains, extend the vegetable garden and continue working our remaining orchard.

You can successfully farm without water rights but you need larger acreage to be commercially successful as you are limited in the crops that you can grow. It is critical to our future success to have long term assurance that our significant investment in trees and equipment will not be undercut. The AG-20 designation provides us with a shield to protect long term farming for us personally and for the county as a whole. We are planning for multiple generations.

**PRESERVING LARGE ACREAGE FARMS**

Alt 2 and Alt 4 eliminate the AG 20 zoning countywide and continues forward past bad land use decisions that have fragmented agricultural lands, led to large lot residential sprawl and weakened the viability of agriculture in this county. Drive around the county now and you will see rural residential at its worse – big houses on multiple acres with sprawling lawns. Please do not double down on those previous bad decisions.

Large acreage zoning can protect farmland for the long term when the parcel size is 20 acres or greater. Fragmenting agricultural land and increasing rural residential reduces the amount of land available for farming and will threaten local food security, undermine our agricultural heritage and weakens the economic viability of farming in Clark County.

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.”

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 because it shrinks available larger lots so that they are no longer economically viable but also reduces the sizes of lots such that they can no longer serve the purpose of being resource land buffers as required under GMA development regulations.
- Large blocks of land dedicated to farming provide more long term stability, sustainability and resilience for agriculture. Anyone who is a regular day to day farmer knows that it is these large blocks that are not susceptible to development that give true farmers a sense of ease knowing that they will be able to continue their Right To Farm practices without having to engage in legal battles with individuals who come out seeking a “rural” lifestyle on a one or 2.5 acre parcel. A farmer can plant an orchard - a 50 plus year investment with some predictability that you won't lose your investment. A farmer can invest in soil amendments, crop rotations and, even at the risk of losing money, crop diversity without having to worry that someone who bought a 1 and ½ acre parcel near by, will sue because they do not like the smell of chicken and cow manure or the early morning grind of farm equipment.
- Large block farming can support necessary 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 a fact of life and, more than 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 DO NOT SUPPORT ALT 2 AND ALT 4**

As sited in the Draft Supplemental EIS the total population growth was revised downward by nearly 7,000 from the previous Comprehensive Plan of 2007. There is no justification for increasing rural residential development as proposed in Alt 2 and 4.

In both of these alternatives, development occurs disproportionately in the rural areas **and nearly equal in their impact on agricultural lands**. 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.

#### Under Alt. 2

- Increases new lots in rural areas by 8,220 with **1,937 on agricultural lands**
- Impacts 34,000 acres across the county
- 16% of projected population grow in rural areas

#### Under Alt 4

- 12,400 new lots with **1,958 on agricultural lands**
- Impacts 65,537 acres across the whole county
- **24% of population growth goes to rural – way above the prescribed 10%**

#### **ALT 2 AND ALT 4 - A PERScription FOR SPRAWL**

Environmental impacts from these two alternatives would be cumulative to surface water, ground water and fish and wildlife resources.

New rural lots would require additional wells and septic systems that would have an impact on natural resources. The EIS does not evaluate the impact to water resources on a site specific watershed basis or where there are existing vulnerabilities in water resources and wellhead protection areas – this does not provide adequate information from which to base a decision. Experiencing one of the driest summers on record it is both short-sighted and cavalier to propose encouraging an additional 8,220 [Alt. 2] to 12,400 [Alt. 4] new wells to tap into the Troutdale aquifer that supplies drinking water to 95% of the population in Clark County.

Existing infrastructure would also be stressed under these alternatives. Our current transportation system would not support the needed roads to accommodate the growth that would occur across the rural portions of Clark County.

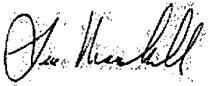
#### **CRITICAL POINTS RAISED IN THE DRAFT SUPPLEMENTAL EIS REGARDING ALT 2 AND ALT 4**

- 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.

For us and our farm it is very personal – my husband's parents and uncle's ashes are scattered under the remaining pear trees. My son got married under the 100 year old king apple tree. We want to keep the land over multiple generations and to support the long term future of agriculture in Clark County. Please keep our rural lands rural and reject Alt 2 and Alt 4.

Thank you for your consideration.

Sincerely,



Sue Marshall  
Co-owner and Operator of Baur's Corner Farm