

**Schroeder, Kathy**

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**From:** John Russo <john@j2b.com>  
**Sent:** Thursday, May 26, 2016 10:23 AM  
**To:** rogersengr1@comcast.net  
**Cc:** Cnty 2016 Comp Plan  
**Subject:** PDF enclosed  
**Attachments:** doc013761.pdf

Please see attached

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**To: Board of County Councilors**

**From: Andersen Dairy/Rodgers Engineering**

**Re: Comments on Comprehensive Growth Management Plan Update for Clark County (including stormwater & environmental (EIS))**

**Date: May 19, 2016**

**Recommendations (Public Comment on Growth Plan ): Andersen Dairy recommends that the Andersen Dairy Farm keep its AG-20 zoning (or change to AG-40).**

Our future plans is to combine lots into larger lot with greater area so that we can re-zone to AG-40 &20.

GMA states Protect, Preserve & Enhance farming in Clark County. How will this be done for large, middle and small farms. The existing AG-20 zoning should stay in place while allowing for 40 in this zone meeting certain county criteria for zone change. To change the zoning from AG-20 to AG-10 through out the county (blanket approach) will not protect, preserve and enhance agricultural in the county. This will allow certain farms to create more houses, driveways, roads, imperviousness, soil compaction, buildings, and smaller area to farm. The future will bring change where more middle & large farms may be needed to provide food and jobs. These important resources may be destroyed by down zoning making more house with smaller lots. This doesn't work for every farm. Property values may increase with property taxes going up making it harder to survive into the future. Would the proposed AG-10 zoning & corresponding development be compatible with the existing neighborhood? If this is to happen, it should be done only on a case by case basis. Every farm (site) is different where a change in zone AG-20 to AG-10 may not work for certain Farm sites because of site conditions & surrounding area (for example: site in 100-yr floodplain; surrounding area is in different zone, site can't retain or infiltrate increased runoff; site grades are to steep; site doesn't have room to cluster without impacting farming practices.

Cluster provision have been rejected in the past and may not be an innovative approach. Where can houses be built so that farming is protected & enhanced. Large or small lots for residential development is what is being proposed now. It appears there is discrimination between forest, rural & Ag zoning; different standards for different resource zoning. What will be the new tax status if farms can not be used as agricultural. All of this will encourage more dividing of land and smaller lots and more development. Farms will be destroyed. County would be out of compliance with GMA, if farms can not be used for agricultural purposes. Maybe the county should move away from a blanket approval to a more site specifics procedure. If Farms at AG-20 are down zoned to AG-10 this could destroy farms because of the following significant adverse impacts to farms: two houses instead of one increasing imperviousness and increased

runoff volumes to down stream owners and farms; increased patios, garages, out building, slabs, and compacted soil areas; more drive-ways, roads, parking areas (more impervious) causing less area to farm and more compacted areas where soils will be hard to farm; it will make it harder to have larger farms in the future, less opportunity for farms to grow. We would end up having only small farms where in the future there may be a need for middle and larger farms.

Almost, all of Clark County was farmed in the past where most of the county was agricultural lands of long-term commercial significance, therefore the whole county can be farmed. There are hundreds for plants and corps that need all kinds of different soil types, some farm need clay soils, some need more gravelly soils for certain corps; loamy soils provide for different plans; and etc. Every farm needs different soil conditions, one type of soil doesn't fit all the different type of farms and the plants & they grow. Some farm need steeper slopes where other need flat slopes, and some farm need gradual slopes for there plants. Some farm plants need more shade while other need more sun. Some farms need large areas where other can farm on small areas. Encouraging only small farms doesn't seem to preserve and protect and enhance future Agriculture in the County.

Every farm is different and if 2 home can be allowed on an AG-20 parcel then it should be shown that this action will enhance and protect and preserve this farm and others nearby. Clustering on AG-20 zoned property to provide for AG-10 may encourage more residential development and dividing of parcels in the rural agricultural zoned areas. Cluster policy is a technique to group houses together. This doesn't work on every AG-20 parcel. Some parcels do not have a location on the lot for a new house that won't have significant adverse impacts on the environment, agricultural future (growth) and adjacent rural (agricultural) properties. This may not protect, preserve and enhance future farming and rural property owners. This may encourage higher density in rural areas and the expansion of the UGB. Some AG-20 parcels are in critical areas where new house would have significant environmental adverse impacts and may be counter to County Code. These new houses on AG-10 may increase runoff volumes to down stream property owners. Does the financial plan have money in it to address these impacts to private property? Does the SEPA document address these impacts? Houses developed on AG-10 parcels may have less farm area; less soil available for planting and more compacted soil form the development. Each individual AG-10 development is different and will need to addressed so farming will be protected , preserved and enhanced for the particular site. A blanket zoning approach may not work, the zone changes may need to be done lot by lot to assure they address GMA and county ordinances. How about the property owner near by who may have their taxes raised and pressured to develop. This will bring more people close to fields.

The proposed GM Plan doesn't provide for middle and large size farms which may make the county not in compliance with the GMA. Where are the innovative techniques that the county is using to enhance farming. Allowing more roads, drive-ways, patios, sidewalks, out-buildings, grading, compacted soils, and development on smaller parcels may not be encouraging and enhancing farming. It appears we will end up with houses on large residential lots encouraging urban development. This may encourage urban sprawl into the rural area, this may not be in compliance with the GMA and County Policies.

The usual and customary agricultural practices may not be protected nor enhanced. More flooding and erosion may take place as this type of development proceeds without individual site review for these zone changes. New houses on large or small parcels may impact surrounding rural property owners. This will allow more people into agricultural areas increasing the opportunity for more trespassing onto farm land causing more negative impacts to farming. This may make it harder to use agricultural lands for farms ultimately making it so Ag land can not be used for farming. The county needs a reasonable defense for this proposed action to agricultural land. What are the innovative techniques to preserve and protect farming? What other alternative & options were looked at by the County to protect, preserve and enhance farming in Clark County? Where is the balance of resource lands with residential sprawl. How will these new houses (AG-10) be compatible with their surrounding existing land uses

Respectfully,

A handwritten signature in blue ink that reads "Robert H. Rodgers". The signature is written in a cursive, slightly slanted style.

Robert H. Rodgers, P.E.  
Principal Engineer