

O'Donnell, Mary Beth



CP16#0268

From: Euler, Gordon
Sent: Tuesday, September 02, 2014 8:00 AM
To: O'Donnell, Mary Beth
Cc: Orjiako, Oliver; McCall, Marilee
Subject: FW Comp Plan EIS scoping comments
Attachments: Clark Co Comp Plan EIS scoping Food System CARE 1Sept 2014 pdf

Follow Up Flag: Follow up
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Mary Beth

For the index

Gordy

From: Jude Wait [<mailto:info@foodsystemcare.org>]
Sent: Monday, September 01, 2014 4:43 PM
To: Euler@foodsystemcare.org; Euler, Gordon
Subject: Comp Plan EIS scoping comments

Gordy,

Comments attached.

Respectfully submitted,

Jude Wait
Food System CARE <info@foodsystemcare.org>

Food System CARE co-convened a task force to pursue immediate and long term food system strategies. Our goal is to facilitate greater support for sustainable food production agriculture and community resilience in Clark County's food system.

Clark County food system stakeholders are endeavoring to retain and increase local food production and sourcing in a region with significant food insecurity and development pressure (Clark_County_Food_System_Council, 2012; Public_Health, 2012). Initiatives to influence the Clark County Comprehensive Growth Management Plan update process motivated us to coalesce and activate now. Indeed the Food System Council has already submitted documents to the County (Clark_County_Food_System_Council, 2013), and we agree with their content and intent, including the handout from the Open House Scoping sessions (hereby additionally included as Scoping comments).

1. Public scoping comments are due on Labor Day 2014—after Scoping “Open House” meetings on August 20, 21, 28, 29 provided the public an opportunity to learn from County Planning staff about the issues and alternatives. The purpose is “to define issues related to the comprehensive plan update that will be addressed in the draft SEIS (Supplemental Environmental Impact Statement). **The comment period was way too short between information sessions and due date.**
2. We will interact with the Comp Plan Update process as it proceeds. For instance, we will provide input to the official record on the revised Comprehensive Plan and the revised (and/or Supplemental) EIS to be released by the County.
3. Given the changes in the system since 2007, we recommend the old documents be scrutinized for accuracy and applicability. How well were the impacts of the huge GMA expansion predicted? What has transpired since 2007? There is new information in reports produced since then, but they too are outdated now (Berk_Consulting, 2012; Gilroy, 2008; Globalwise_Inc, 2007; Meter, 2008; Moser, 2010). Furthermore, the actual impacts on the agri-food system, such as farm and home foreclosures, land sales, conversions to other uses, etc., should be investigated. What is really going on with Current Use taxation designations?
4. Within the County planning context, we support maintaining and enhancing the “long term commercial significance” of the agricultural sector as directed under the Growth Management Act. However, we suspect the County has fallen tragically short on their intent to meet the mandate. Farmland has been lost across the County, in part through conversion to other land uses, and incorporating viable farmland into the UGA without acknowledging the importance of ongoing urban and urban-interface agriculture. As the nature of agri-food system commerce has changed over recent decades—with an upsurge in local and direct marketing strategies, a greater variety of operational scales and diversified cropping, for examples—we would offer a broad inclusive definition of “commercial” and “significance.”

5. Parcel sizes should be maximized for farming in rural and urban interface areas, along with more support for infrastructure revitalization. Preventing further fragmentation through agricultural districting is but one of many tools we recommend. Whole-system support for farmers would address the numerous barriers farmers have already identified, repeatedly. Solutions recommended by farmers and other stakeholders should be considered for implementation (Ag.Preservation_Committee, 2009; Rural_Lands_Task_Force, 2010), and evaluated as part of the Comp Plan and SEIS. This could mean an additional Alternative or an added set of issues to be presented and evaluated.
6. There is also a vibrant urban agriculture sector provisioning many families through the Food Bank, community gardens, Growing Groceries, Master Gardener mentors, school and church gardens, etc. The growth in this sector should be prominent in the Plan and impact analyses. Support and recognition are due. These are job and skill building sectors as well, along with improving food security and health, and reducing hunger and poverty.

We realize the need for independent food system initiatives as well, and many are underway. We intend to recognize them and fill some of the gaps to achieving greater collective impact and our vision for a more resilient region.

1. Acting as a network facilitation hub, our aim is to interconnect the wide array of food system stakeholders, including the voices underrepresented in public discourse—which is primary to the mission of Food System CARE.
2. We think the County and others should pool resources in order to support
 - a. improved, upgraded and updated information on the agri-food sectors—which is needed to inform smarter long term planning
 - b. increased public engagement through an independently facilitated process such as Wisdom Councils.

Thanks for your consideration of these comments. We are available to answer questions, provide clarification, and if given more time, streamline the comments.

For the task force,

Jude Wait

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