Clark County Planning Commission

c/o Sonja Wiser
Clark County Community Planning
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Dear Planning Commission & Board of County Commissioners,

Attached please find comments to the Planning Commission for the 17 December public hearing.

Please do not recommend de-designation of any more prime farmland of long term commercial significance for agriculture. Please instead recommend an Agricultural Land Bank and Agricultural Production Districts.

As such efforts would take time, building on the work done for the de-designation process and by the Food System Council, the current RILB proposal would cause cumulative long term adverse impacts. As we would lose another large area of agriculturally productive land. Please recommend denial at this time for the RILB.

Thanks for considering the future of food farming in Clark County.

Respectfully,
Jude Wait
Comments on the Rural Land Bank Proposal for the public hearing on December 17, 2015

As you consider the proposal to de-designate yet another large block of prime agricultural land of long-term commercial significance, please reflect on the following counter proposals. Either way, please do not grant the Rural Industrial Land Bank proposal to develop yet another 600 acres of farmland.
1. The Agricultural De-designation Appendix formulates a draft Agricultural Land Bank proposal. Long-term commercially significant agriculture is variously mapped and described.
2. The only way to abide by the intent of the GMA to keep the land in agriculture is to keep the land in agriculture; it’s that simple. With all due respect to current, past, and future farming operations, de-designation is not justifiable.
3. All the sites could represent potential Agricultural Production Districts
   a. There are of course other neighborhoods in Clark County that would be still suited for such districting as well
   b. In such regions, various policy and economic development tools can be used to support the infrastructure and other needs of the agriculture community and its beneficiaries.
   c. All residents of the region and all participants in the food system benefit, in the long run, when farmland is conserved, along with critical areas, ecosystem services, and other natural resources.
   d. Farmers benefit as well, as the infrastructure and sector capacity is better maintained, adapted, and implemented.
   e. It is very heartening that these four areas you have cursorily analyzed have a “majority of land in current use taxation,” further documenting their agricultural significance, and current use.
4. See also the Food System Council map for Agricultural Land Bank and Production Districts
5. Please refer to the 2009 Agricultural Preservation Committee report. The County’s food system resilience would be greatly enhanced if farmers were supported in overcoming the barriers and challenges, as outlined clearly with recommended solutions in the 2009 report. Food security depends on all of the food system, and is not just pertaining to the emergency food system and direct marketing venues. There are many ways to support farmers.
6. Farmers both young and old want to stay or start farming here! All sizes of operations are needed, and a diversity of products are indeed feasible to produce here, a fact supported by the numbers and diversity of farming operations. Farmers are using various site class lands as well. And they need more land, not less, larger parcels, not smaller.
7. This is indeed some of the most valuable farmland in the County, as it is relatively large enough for a commercially viable mid-size farm. The infrastructure is there, there are a diversity of farms, and operations in the areas, including both leased and owned farmland. The GMA specifies keeping enough infrastructure to ensure viable agricultural commerce.
8. The sector is still viable, and the land is still available and being farmed. Please do not de-designate farmland or potential farmland. There are many farmers looking for more land to farm, whether they are younger operations or multi-generational businesses. Let’s make them all feel welcome and supported.

Thanks for your time and consideration for supporting farming and farmland preservation in Clark County. Such efforts are sadly way past due. Thank you, Clark County, for developing a justification for an Agricultural Production Zone for the agricultural and rural lands a much-needed area wide study.

Respectfully submitted,
Jude Wait, food farm resilience researcher