LETTER OF TRANSMITTAL

TO: Planning Commission
FROM: Rodgers Engineering / Andersen Dairy
DATE: 5/2/16
SUBJECT: Public Comment on Growth Plan Update / EIS

GROUP AREA: COUNTY NUMBER:
LEGAL DESCRIPTION:
PARCEL NUMBER: LOT NUMBERS: 
SITE ADDRESS: Andersen Dairy

NEIGHBORHOOD ASSOCIATION: ENGINEERS SIGNATURE:

X Attached _____ Copy of letter _____ Print _____ Mylars
___ Plans and Profiles _____ Miscellaneous _____ Other _____ Vellums

Comments:
As Find 3 page letter report & 2 Maps.

RECEIVED CLARK COUNTY
MAY 03 2016
COMMUNITY DEVELOPMENT ADMINISTRATION

Sincerely,
Robert H. Rodgers, P.E.

Civil Engineering Water Resources Environmental
To: Clark County Planning Commission
From: Andersen Dairy/Rodgers Engineering
Re: Comments on Comprehensive Growth Management Plan Update for Clark County (including stormwater & environmental (EIS))
Date: March 30, 2016

Recommendations (Public Comment on Growth Plan): Andersen Dairy recommends that the Andersen Dairy Farm keep its AG-20 zoning (no changes).

Andersen Dairy, Inc. is a major Dairy in Washington State providing many jobs and excellent milk for the community. The Farm provides stability to the community where it has been farmed for over 50-years. The Dairy was established in 1967 by Ronald Andersen. The Dairy’s Agricultural Commercial business is a significant employer providing hundreds of jobs for our local community. The Dairy provides high quality dairy products at a low price through out Clark County and Washington. The Farm operation currently employs approximately 250 people. By appropriate comprehensive Planning and appropriate zoning through the GMA process the 1300 acre farm will be able to survive into the future and provide future employment for the community. By keeping present AG-20 zoning and up zoning to AG-40 or AG-20 where inappropriate down zoning has taken place in the past, will keep most of farm at AG-20 or 40. This will help the County meet its obligation to the Growth Management Act for this farm area. We have had meeting & discussions with the Planning Director, Community Development Director and Principal Planner, concerning the recommendations in this letter report.

This Dairy is extremely important to the community for the following reasons: promotes good economic stability; provides a local food source; provides employment and shows where the county should be going with GMP. This prime farm & farmland are of statewide importance and long term commercial significant. This Farm has shown how to survive in hard times like a recession. How will the County keep farm surviving as specified by GMA and County Planning documents. We have recommendations for the Planning Commission & County Board of Councilors (for more see the following).

Comprehensive Plan Up Date for our farm area should be the no action alternative (Alternative 1) with up zoning for lots not zoned AG-20 the way it used to be with GMA planning. The only exception may be along NE 162nd Avenue and NE Fourth Plain Blvd., where resource/agricultural business and industries may be located (rural in nature). We have discussed this with the county during the public comment period for this growth plan update. Since we have a significant amount of farm land between City of Vancouver, City of Camas and rural Clark County that provides open space, agricultural resources, buffering should be implemented per GMA.
The current Preferred Alternative (recently changed) seems to be proposing to down zone our farm property now AG-20 zone. This may increase property values for our farm property. Our property values will be inflated and our property taxes will be higher making it hard to survive the next 20-years, if lots making up the farm are down zoned to less than Ag-20. This would be a significant negative impact to the farm economy reducing the future potential for jobs and meeting GMA. We can not afford the farm to be down zoned. How will Zoning be applied to different Land Use Elements and Areas? A blanket zoning/planning approach would not address significant differences in land area & uses throughout the County.

After talking with County Planning, we understand that our parcels (along NE Ingles Rd) making up the farm with split zoning will be re-zoned to Ag-20 to meet the law. We would like the County to revise rural zoning map for our farm area so all split zoning will go back to the original Ag-20 zoning as we feel required by GMA and county policy. We do not want our minimum lot size change for parcels zoned AG-20.

Open Space, Low Areas, Resource Land and Critical Areas make up a lot of the farm area. These areas should be set aside and not developed or down zoned per GMA. This will assure that they exist into the future for future generations.

Increase in property taxes for Farms that want to go into the future, may be a significant adverse impact. If our farm parcels are down zoned this may increase assessed property value and property taxes in the next 20-years. This may cause a decrease in farming in the next 20-years.

Urban growth, city reserve areas, down zoning doesn’t need to expand into agricultural resource lands, presently there is plenty of vacant land inside the UGA (UGB) for growth. City’s and County do not need to move into agricultural Lands to provide for growth (county reports). Our Farm will grow in the future, if the Agencies will stop expanding into agricultural land and down zoning. This will help make farming sustainable into the future.

We (the community) need a local food source from local farms so that our community is not dependent on outside sources (substantiability). We have the soils, water and climate (upper Willamette Valley) to grow and produce our own foods while employing large number of people. Our community likes local foods from local farms. This will help make us independent and strong (substantiable).

**Growth Management Act (GMA) for our Farm:**

The Counties & Cities shall designate natural resource lands of long-term commercial significance for Agricultural lands. Maintain and enhance natural resources industries like our farm. Retain open space. Protect Critical Areas & Resource lands. Identify open space corridors within & between UGA’s to connect habitats and critical areas and resources areas. Protect natural resources, environmentally sensitive and rural areas. Encourage a clear distinction between urban & rural areas. Land within the UGA should not contain areas designated for long-term agriculture resource use. The UGA’s should utilize natural features such as drainage ways, steep slopes, open space and riparian corridors to define the boundaries.
Right to Farm Act:
We are concerned about the highly likely trespassing impacts to our farm from development adjacent to our farm as well as potential negative impacts from increased runoff volumes from development. Planning should include an agricultural buffer to help mitigate adverse impacts to the farm. Presently, the farm is having significant adverse impacts from development near the farm.

Commercial/industrial production from farm products may be a way for Clark County to provide future jobs and to stimulate our local economy in a more natural way that could get support from our local community. Parts of the Farm has been down zoned along NE Ingles Road, NE Fourth Plain Rd & NE 162nd Avenue. Maybe these areas could have industries and commercial businesses related or supporting agricultural production and products. This could be part of future discussions.

The land use element of the GM plan is to provide for protection (where applicable) and address drainage, flooding, and run-off problems with coordinated solutions. How will the Land Use Element be applied to our farm area?

Andersen Dairy Farm is an agricultural farm of long-term commercial significance and also of state wide significance. Planning efforts should encourage a clear distinction between urban & rural areas and UGA’s should not contain farms of long-term significance. In addition, it appears some of the split zoning parcels the county is presently addressing on our farm are going to be changed back to the original AG-20 by the county.

The farm provides the following benefits for environment & the community: affordable high quality milk; wildlife & habitat; green open space; buffer between cities; a huge bio-filter for water quality; open space corridors for wildlife; and jobs. We need agricultural diversity in the GM Plan Update for the county which will include both large & small farms (not just small farms). With diversity you get away from just one size for farms that should help farming survive into the future. We need small, middle and large farm so we don’t put all our eggs in one basket. Remember, each farm has some what different physical needs: different types of soils for different corps and produces (not one type of soil fits all farms); water requirement are different between farms with different corps; for climate; for groundwater; for irrigation; plowing; wind; seeding; amount of sunlight and location. It takes numerous parameters to define where farm should be in a plan not just one like soils.

Respectfully,

Robert H. Rodgers, P.E.
Principal Engineer