



May 24, 2016

The Honorable Marc Boldt, Council Chair  
Clark County Board of County Councilors  
PO Box 5000  
Vancouver, Washington 98666-5000

Mr Steve Morasch, Chair  
Clark County Planning Commission  
PO Box 9810  
Vancouver, Washington 98666-9810

**Subject: 2016 Rural Comp Plan Record**

Dear Chair Boldt, Council and Commission Members

My name is Sue Marshall We have a 20 acre family farm in the Ridgefield area With our daughter, we are beginning a third generation of farming our land The current zoning of our farm is AG- 20 and we would like to retain that designation as a means of protecting the long term use of our land as an agricultural resource to the community and as a family legacy

I strongly oppose the proposal to eliminate AG-20 zoning and reduce the minimum agriculture lot size to 10 acres This proposal disproportionately and negatively impacts agricultural resource lands It cannot be justified based on the growth assumptions which have been reduced from the 2007 Comp Plan Of the 985 new rural parcels created, 85% are on agricultural resource land (see table 1-2, comparison of rural build out at the end of this testimony).

Further parcellization of agricultural land has a number of negative impacts on farming

- Reduces revenue base to farmers
- Smaller lots increase the per acre cost of farmland, leads to land speculation for development and makes agricultural land prohibitively expensive for a farmer
- Limits the type of crops one can grow successfully
- Requires water rights to have a chance of being successful – no water rights are available in Clark Co
- Increases conflicts with existing agricultural uses
- Undermines the farming infrastructure as land is converted from agriculture to residential resulting in fewer working farms

Do not allow nonagricultural activities on agricultural lands as this further undermines the viability of agriculture

Do not expand urban growth areas onto agricultural resource lands as proposed by LaCenter and Ridgefield There has already been significant reduction of agricultural lands. I believe that conditioning these expansions requiring the cities to defend if there is a legal challenge is an abdication of your responsibility to pass a growth plan that complies with the GMA

Do not cluster on agriculture and forest lands On its face this does not satisfy the GMA mandate 'to conserve agriculture land for the maintenance and enhancement of the

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agricultural industry' If flexibility and support for resource management is the objective it would be better to create an accessory dwelling unit option to allow a family member or employee to assisting with resource management and this option should be granted on a case by case basis

Remainder lots are not protected as agriculture but could be designated as open space and therefore subject to future development and conversion to other purposes

Agriculture zoning needs to be strengthened not weakened if we are to secure long term economic viability of agriculture

Increased traffic make it difficult to move farm equipment – in attempting to transition to organic pears requires more frequent spraying – already getting up a 6 am use the road at the end of each orchard row on 169<sup>th</sup>

**Right to Farm** - revised policy 3 5 10 appears to limit the protections of right to farm laws to prevent agricultural activities from being found to be 'public' nuisances Washington's right to farm law applies to both public and private nuisances Policy 3 5 10 should be consistent with the state right to farm law and should apply to any nuisance claims

Leading into the discussion about Alt 2 during the Planning Commission's deliberations on Nov 17, 2015, Chris Cook said the following

**“My office does have some concerns about this because there is evidence in the record of opposition about what this would do to agriculture in the county. In order to adopt this under GMA the county will need to find that eliminating the AG 20 minimum size would maintain, enhance, preserve, promote and conserve the agricultural industry, which is why agricultural resource land is agricultural resource land.”**

This proposal fails to demonstrate how eliminating the Ag-20 designation would maintain, enhance, preserve, promote and conserve the agricultural industry

I would recommend adopting the Planning Commission's recommendation that they have twice forwarded to the Council

Thank you for your consideration

Sincerely,



Sue Marshall, Co-owner/operator  
Bours Corner Farm

Table 1-2 Comparison of Rural Build-out Conditions

Existing Conditions 2007 Comprehensive Plan		2016 Preferred Alternative			Net Change	
Zone	Number of New Parcels	Acreage Affected	Number of New Parcels	Acreage Affected	Number of New Parcels	Acreage Affected
Rural	5,195	34,438	5,383	35,578	188	1140
Forest*	387	4,356	412	4,842	25	486
<b>Agriculture</b>	908	14,582	1,750	20,252	<b>842</b>	5670
UR	70	307	n/a	n/a	-70	-307
Other**	479	3,437	479	3,437	0	0
<b>TOTAL</b>	<b>7,039</b>	<b>57,119</b>	<b>8,024</b>	<b>64,108</b>	<b>985</b>	<b>6,989</b>

\*The Rural Capacity Estimate excludes property in the current use program for Timber and Designated Forest Land.

\*\*The 'Other' category is a combination of all other zoning designations that have vacant or underutilized parcels per the Rural Capacity Estimate, which are not directly affected by the zoning changes proposed in the Preferred Alternative. The exception is the Urban Reserve-10 zone that will be converted to R-5 upon implementation of the Preferred Alternative. Page 1-6 Project Description April 2016

From Final Supplemental EIS, project description, page 1-6