

March 7, 2016

Mr. Gordy Euler, Planner III
Post Office Box 9810
Vancouver, Washington 98666-9810

RE: Proposed amendment to establish a Rural Industrial Land Bank pursuant to RCW 36.70A.367.

Dear Mr. Euler:

Thank you for sending Growth Management Services the proposed amendments to Clark County's comprehensive plan and development regulations that we received on Jan 28, 2016, and processed with Material ID No. 22047. We understand this process was initiated by a request from private landowners to consider designating their property as Rural Industrial Land Bank (RILB). We have reviewed the proposed amendment, the EIS Addendum, consultant reports, public comments and other background materials found on the project website. Please consider the following comments.

Rural Industrial Land Bank

The criteria to establish RILB is found in RCW 36.70A.367. Clark County qualifies under the statute to establish a RILB and appears to have addressed the requirement to identify and evaluate alternative sites, including sites within the existing UGA. The inventory (EIS Addendum, Part I), includes two sites within the UGA that met screening criteria. These sites were subsequently combined for further analysis.

One of the criteria used by Clark County was to identify only private land for consideration. Commerce is curious about this as the Port of Vancouver holds a significant amount of vacant Industrial land, as noted in the Inventory report (*EIS Addendum, Rural Industrial Land Bank Inventory, Page 14*). The Port-owned site was not analyzed further as the other UGA sites were determined to be more ready for development. We do not see any comment in the record from the Port on the RILB proposal. We urge the County to provide documentation concerning the readiness of the Port site for development and documentation that they were consulted during the process.

Agricultural Resource Lands Analysis

The proposal includes an agricultural analysis of the four non-UGA alternative sites under consideration for RILB designation (*EIS Addendum, Appendix B: Agricultural Lands Analysis*). The analysis applies the criteria found in WAC 365-190-050 for designating Agricultural Resource Lands of Long-term Commercial Significance to the alternative sites and surrounding areas.

While the report provides a detailed analysis of the agricultural designation criteria, it is difficult to find specific conclusions that the docket property, Site 1, should be de-designated from Agriculture to Light Industrial. The County states in a response to addendum comments that “the County will weigh GMA goals and the RILB analysis, as well as public comment, in its decision” (Page 9, Comment 2.9, *Response to SEPA Comments*). We cannot locate findings in any of the reports or in the draft Resolution submitted to Commerce for 60-day review that clearly states the reasons why the property is better suited for industrial use over agriculture. We encourage the County to establish a clear, defensible record with specific findings and conclusions.

Specific concerns we have concerning the de-designation analysis include the following:

1. Site 1 properties contain some of the best agricultural land in the County, 99% of which is considered prime farm land, with significant percentage of the land being Class 1 and 3 soils. The rate at which agricultural lands are being converted to other uses is alarming. According to a new analysis by the American Farmland Trust, 41 million acres of rural land has been permanently lost in the last 25 years to highways, shopping malls, poorly planned sprawl and other development. Of that amount, 23 million acres (an area the size of Indiana) was agricultural land. We urge Clark County to consider other sites such as the Port Property and save this 600 acres of prime agricultural land.
2. Site 1 has excellent access to rail and highway transportation facilities and is within close proximity to local markets. The fact that the current dairy operation does not sell milk locally does not discount the potential importance of this farm land to the County’s future food security.
3. The report states that the existing dairy operation would like to relocate to Eastern Washington and that the dairy industry is declining. GMA rules clearly state that “the intent of the landowner to use land for agriculture or to cease such use is not the controlling factor in determining if land is used or capable of being used for agricultural production” (WAC 365-190-050(3)(i)). The report does not provide any analysis concerning the viability of other types of agricultural production on this property.

Thank you for the opportunity to comment on the proposal. If you have any questions or concerns about our comments or any other growth management issues, please contact me at 360.725.3056. We extend our continued support to Clark County in achieving the goals of growth management.

Sincerely,

Ike Nwankwo