

From: [Jeffrey Delapena](#)
To: [Clark County Citizens United, Inc.](#); [Cnty 2025 Comp Plan](#); [Bart Catching](#); [Jeffrey Delapena](#); [Jose Alvarez](#); [Oliver Orjiako](#)
Subject: RE: CCCU opposed to EcoNorthwest erroneous Agricultural Lands Report 2025
Date: Monday, December 1, 2025 8:22:41 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good day, Carol,

Thank you for your feedback related to the Agricultural Lands Study for the 2025 Comprehensive Plan Update.

These will be entered into the Index of Record. We will ensure they are also brought to the attention of the Planning Commission.



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From: Clark County Citizens United, Inc. <cccuinc@yahoo.com>
Sent: Thursday, November 27, 2025 2:26 AM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>; CommDev OA Land Use <CommDevOALandUse@clark.wa.gov>; Bart Catching <Bart.Catching@clark.wa.gov>; Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>; Matt Little <Matt.Little@clark.wa.gov>; Sue Marshall <Sue.Marshall@clark.wa.gov>; Kathleen Otto <Kathleen.Otto@clark.wa.gov>
Subject: CCCU opposed to EcoNorthwest erroneous Agricultural Lands Report 2025

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Clark County Council
26, 2025

November

Clark County Community Development
Clark County Planning Commission
P.O.Box 5000
Vancouver, Washington 98666

FOR THE PUBLIC RECORD AND THE COMPREHENSIVE PLAN

Re: CCCU opposed to EcoNorthwest erroneous Agricultural Lands Report 2025

Dear Councilors, Staff and Commissioners,

Clark County Citizens United, inc., (CCCU) a 501c4 non-profit representing approximately 6,000 rural residents, is opposed to the 2025 EcoNorthwest Agriculture Lands Report for Clark County, and believe the information contained in it is clearly erroneous. It states all rural and resource zoned land in the county is prime agricultural land. That is simply not true. Clearly EcoNorthwest, who received \$155,000 tax dollars for their work, disregarded all the other agricultural studies for Clark County and the USDA Census of Agriculture. EcoNorthwest got it wrong.

Clark County has performed many agriculture studies over time, and these studies supposedly used best available science and scientific research for their conclusions. EcoNorthwest disregarded all those historical studies, NRCS, USDA Soils Manual, Census Reports and confirmed data, and replaced it with their own fatally flawed view.

It appears all these studies for previous “agriculture study committees”, came to the same conclusion.. , According to the Growth Management Act mandates, long term commercial significant agricultural land in Clark County doesn’t exist, given all the statistics presented in these previous reports. Whether the current agriculture commission was given those reports, is anyone’s guess, but it’s clear that best available science, historical farm activity and vital statistics were not used in either the EcoNorthwest report or in the 2025 Ag Commission’s comments and “recommendations”.

One Ag Commission member went so far as to say the NRCS – USDA commissioned 1972 Soil Survey of Clark County Washington, was not going to be used. That is the current manual for soil in Clark County and is mandated in the Growth Management Act for use as the primary document for determining Agriculture land. It’s clear the purpose of this 2025 agriculture study in Clark County was to lock up as much land as possible into the agriculture 20 zone, that includes Rural 5,10 and 20 acre zones, to prevent those lands from being developed. That is putting a cap on rural growth, and

that is illegal.

The Growth Management Act clearly states counties must allow for rural development with a variety of housing. County staff claims LAMRIDS do that, but that isn't what the GMA says to do. Rural Centers, or LAMRIDS were created well after the GMA was adopted. The original language in the RCWs and WACs are clearly talking about Rural zoned land, and remains in the document today. LAMRIDS were determined in the GMA to be the commercial hubs that would serve the rural and resource areas. CCCU went to court to defend rural centers (LAMRIDS), when the county removed them from the 1994 Comprehensive Plan. CCCU prevailed, but not all the rural centers were brought back into the Plan. Now, suddenly, LAMRIDS qualify for rural housing requirements. That is a flawed definition of the zone.

Public records show that Clark County had many "agriculture committees" and hired many consulting firms to determine agriculture in Clark County. All these reports are in the county records, and it is a mystery why they weren't used by EcoNorthwest, in this 2025 agriculture land evaluation. The following quotes are from those reports.

1954 CENSUS OF AGRICULTURE

Most of the farm income is received by 1,490 commercial farms, or about one-third of the farms in the county.....However, the largest number, 686 operators, received from only \$1,200 to \$2,500 per year.

1992 CENSUS OF AGRICULTURE : CLARK COUNTY

The majority of the farms were 1 to 40 acres.

Total farm production expenses were \$27,839

Net cash return from agricultural sales for the farm unit was \$4,093.

1994 FARM FOCUS GROUP – POSITION STATEMENT #1

Agriculture is generally no longer economically viable in most parts of Clark County. Two tests of economic viability cannot be met. First, net farm income is inadequate to support a household: that is, a household cannot make a living from farming without supplemental nonfarm income. Second. Farm income cannot support the cost of land, at current values, even if all other household income is generated from nonfarm activity. Other factors, such as operational conflicts and regulation, make farming difficult and costly. Land prices are too high - "Opportunity cost" is too great - Residential development is too pervasive - Regulations are costly - Support services and markets are gone.

2005 POPULATION AND ECONOMIC HANDBOOK – CLARK COUNTY

DEMOGRPHICS – AGRICULTURE: COUNTY

This report shows that for 1982, 1987, 1992, and 1997, the “*farms by value of sales less than \$2,500 was by far the largest number and majority of farm for all four years of data.*” Such income is not considered long term commercially significant under the GMA.

GLOBALWISE, INC.

Clark County commissioned the consulting firm **Globalwise, Inc.** to perform an agriculture land study in **2006**. The firm is an agricultural economic consulting company based in Vancouver, Washington. **On October 19, 2006** a report was issued called, **Analysis of the Agricultural Economic Trends and Conditions in Clark County, Washington**. The conclusion, after extensive research for the 41 page report states:

“Clark County has a long history of producing and processing agricultural crops and livestock. The mix of what is produced is highly diversified. Land conversion to urban uses is one factor that is causing farmers to struggle, but there are many other factors that have reduced the competitiveness of Clark County agriculture.

The rapid urbanization occurring in Clark County makes it imperative to determine what constitutes commercial agriculture in order to guide decisions about protecting agricultural land for the farmers. Tradition farming with larger acreages devoted to single commodity crops or livestock is in rapid decline and following a long term trend. There are no fundamental reasons to expect that this element of agriculture will recover or prosper in this county. Incidental use of land for “agriculture-like” activity is not commercial agriculture and does not advance the goal of protecting land for agricultural production. In between these ends of the spectrum is small scale, diversified agriculture that does contribute to long term commercially significant agricultural production and does meet GMA requirements. This aspect of agriculture should be the primary focus of Clark County agricultural land use policy.”

Globalwise, Inc. again issued an **April 16, 2007** report over agriculture in the county. This report stressed the use of **Class I and Class II** agriculture soils. The report was also titled Analysis of the Agricultural Economic Trends and Conditions in Clark County Washington, issued **April 16, 2007**, with the same results. The **Executive Summary** states:

“As the overall economy of Clark County increases, agriculture is a shrinking share. In 2004, agriculture employment accounted for about one percent of the county’s total

manufacturing. The analysis of the Clark County economy for 2004 showed that less than four percent of the county's food processing is contributed from within the county when measured by the value of county raw product inputs as a percentage of the value of output"

"Farming much of these land areas is not viable for the long term, even though the following actions have been taken: 1) the county's agricultural zoning limits development, 2) land owners can receive greatly reduced property taxes through current use farm and agriculture land designation"

"The acreage being placed in current use for farm and agriculture designation is declining rapidly."

"Rapidly escalating land prices in the County have created a major barrier for new farmers to enter this business."

In March 2008 Clark County convened the Agriculture Preservation Advisory Committee.

Following is a brief summary of the barriers and strategies discussed in this **Agriculture Preservation Strategies** report.

- 1. Barrier – Institutional limitations**
- 2. The high cost of land**
- 3. High production cost and low return for farm products.**

2012 CENSUS OF AGRICULTURE – CLARK COUNTY, WASHINGTON

This USDA census showed between 2007 and 2012, what the Globalwise report determined.

Number of Farms was only reduced by 172 farms.

Average farm income was approximately \$26,000 for both those years. This was not a living wage for those years.

Government Payments increased dramatically from \$115,000 to \$293,000, withing the same parameters. Clearly all farms were being subsidized by taxpayer dollars, to just make ends meet.

BERK – CLARK COUNTY RURAL LANDS STUDY – MAY 15, 2012

“Page 5 – There has been substantial growth in the number of very small farms and moderate growth of small farms.

Page 6 – A Diverse set of small farms and enterprises are increasingly becoming part of the rural landscape.

A farm growth in Clark County between 1997 and 2007 occurred in the very small and small farm categories.

Because these farms produce very little income, they are mostly supported with non-farm income....

Very Small Farm – *Very small farms produce less than \$10,000 in a year. These may be “lifestyle, “hobby”, or “retirement” farms, among others. In general, these are family farms that rely heavily on non-farm income.”*

One can easily see, the BERK Study said the same thing as the original 1994 Agriculture Focus Group, and all the other studies thereafter. For EcoNorthwest to now claim all of land in the rural areas, outside the urban growth areas, is prime agriculture land, is folly and fatally flawed. The other studies didn't focus on soil, as the GMA requires, because it was clear there is no long term economic significance for agriculture within any of those lands, regardless of the soil. Clark County cannot simply overlay agricultural designations on thousands of acres of land, and not be responsible for financial repercussions. If the county is going to control these lands in this way, they will have to pay for it.

Sincerely,

Carol Levanen, Exec. Secretary

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