

**From:** [Jeffrey Delapena](#)  
**To:** [Clark County Citizens United, Inc.](#); [Cnty 2025 Comp Plan](#); [Bart Catching](#); [Susan Rasmussen](#); [Jose Alvarez](#); [Jeffrey Delapena](#)  
**Cc:** [Rebecca Messinger](#)  
**Subject:** RE: 1994 FARM FOCUS GROUP POSITION STATEMENT #I facts haven't changed  
**Date:** Monday, January 12, 2026 4:21:39 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

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Good day, Carol,

Thank you for providing this feedback related to the 2025 Comprehensive Plan Update.

I am forwarding to additional members of Staff. Your comments will also be brought to the attention of the Planning Commission ahead of the continuation of the Joint Hearing on Jan. 15<sup>th</sup>. This will also be added to the Index of Record.

Best,



**Jeff Delapena**  
Program Assistant  
COMMUNITY PLANNING

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**From:** Clark County Citizens United, Inc. <cccuinc@yahoo.com>  
**Sent:** Monday, January 12, 2026 4:14 PM  
**To:** Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Matt Little <Matt.Little@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>; Sue Marshall <Sue.Marshall@clark.wa.gov>; Kathleen Otto <Kathleen.Otto@clark.wa.gov>; Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>; Bart Catching <Bart.Catching@clark.wa.gov>; CommDev OA Land Use <CommDevOALandUse@clark.wa.gov>; Susan Rasmussen <sprazz@outlook.com>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>; Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>

**Subject:** 1994 FARM FOCUS GROUP POSITION STATEMENT #1 facts haven't changed

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January 12, 2026

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

FOR THE PUBLIC RECORD AND THE COMPREHENSIVE PLAN

Re: 1994 FARM FOCUS GROUP POSITION STATEMENT #1 facts haven't changed

Dear Councilors, Commissioners, and Staff,

Clark County Citizens United, Inc. (CCCU) has archived most of the Clark County planning documents from 1992 to today. In addition, a CCCU Board member, Jerry Olson, saved all the planning documents for Clark County, back to the 1950s which he stored in the basement of Olson Engineering. When he sold the business, he asked that those documents be archived within CCCU's documents.

CCCU's Board of Directors is composed of all walks of life, including farmers, foresters, civil engineers, attorneys, rural landowners, and developers. Five of those members served on the original 1994 Farm Focus Group, and Forest Focus Group. These two groups are what staff insists determined the resource zoning in the Clark County Comprehensive Plan. Those claims by staff are false. The reason those folks wanted to be on the CCCU Board was because of what happened to their work, when the Plan was adopted in 1994.

Both the forest and farm groups reported that after two years of their time and energy, going through volumes of maps and data, to create reasonable and defensible zoning, the work was all tossed out in exchange for attorney, John Karpinski's "Green Alternative". His dictations are what we currently have in the 2025 Comprehensive Plan. The Growth Management Act has changed since then, to give better definition to resource and rural lands, in response to his unauthorized dictation and the Poyfair Decision, but Clark County has failed to acknowledge correct information and continues to use the "Green Alternative" as a basis for those rural and resource lands.

In the Farm Focus Group Position Statement of 1994, which included the majority of the members, it states:

*"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.”*

Following this paragraph, the Group states what are the restrictions for farming:

- 1. Land prices too high**
- 2. “Opportunity cost” is too great**
- 3. Residential development is too pervasive**
- 4. Regulations are costly**
- 5. Support services and markets are gone**

Within those topics, the Group elaborated and defined what is meant in each of those categories, with explanatory paragraphs. Only a few members of those Groups opposed the majority opinion, and formed a second position. It was the second position that was used by the county.

Since that time, there has been numerous “farm advisory groups”, who determine the same information, and yet the county has never changed the Comprehensive Plan in the rural and resource zoning to reflect those existing conditions. But they did adopt dramatic changes to Vancouver’s urban growth boundary, using that same information, to almost double the footprint of that city.

One of those justification documents, called CLARK COUNTY DEMOGRAPHICS – AGRICULTURE: COUNTY, was created in 2005, the year of the massive expansion. Most of that land consisted of prime agriculture soil and working farms. The document used the dates of 1982, 1987, 1992 and 1997. On pages 100 and 101 are lists of farmland and farm activity for those four years. Comparing the information in these many items demonstrates an inconsistency in the data, but all of it comes to the same conclusion, that agriculture was not viable in Clark County.

The number of agriculture study committees and groups used by Clark County is almost overwhelming. We start with the **1994** Farm Focus Group, the **1997** Agri-Forest Committee followed by the **2004** and **2005** Agriculture Study: the October 19, **2006** and April 10, **2007** Agriculture Analysis by Globalwise, Inc.: the May 15, **2012** Rural Lands Study by Burk, and the current **2026** Agricultural Study Commission, along with numerous other citizen groups, that came to the same conclusion,. that agriculture is not viable in the county. Yet, Clark County continues to keep the same incorrect agriculture zoning in the Comprehensive Plan, which they know is too big and not accurate.

Attorney, Glen Amster in (1994) CCCU’s MOTION ON THE RECORD – page 8,

beginning at line 4, states:

***“ Ms. Bohard identified maps as the third source for the resource land designation. In its Index, the County lists two critically important sets of working maps--apparently the only record of the work of the Focus Groups. They are described as follows:***

***N. Resource Working Maps***

***1. Series of working maps used by each of the focus groups (mineral, agricultural and forestry) in the development of recommendations regarding resource designations. Each focus group divided the County into a number of planning areas and within those planning areas evaluated information on soils, over, available infrastructure, parcel size, current use tax status, slopes and other environmental issues such as wetlands, flood plains, etc.***

***2. There were also working maps utilized for the rural resource areas in which the County was divided into rural planning areas.”***

Mr. Amster points out:

***“There are more than thirty working maps, and they are not listed in the Index with sufficient specificity to allow designation. The maps themselves bear both titles and dates, but this information has not been transferred to the Index. It would have been impossible, in the four hours allotted, to even identify the pertinent maps, let alone study them.***

***The aerial photographs which apparently provided the only basis for determining whether a parcel had “agriculture cover” are not listed at all. The County’s astonishing rationale for this serious gap in the available information was that the cost of reproducing the photos was too great.”***

Glen Amster’s accounting of his discovery supports the 2014 Metadata document that CCCU submitted into the Index Record, regarding only the use of aerial photography to determine agriculture and forest resource land in Clark County, which is not allowed under the GMA.

A 1944 document called **Economic LAND USE CLASSIFICATION for CLARK and COWLITZ COUNTIES** provided by the AGRICULTURAL EXTENSION SERVICE, room 202, Courthouse, VANCOUVER, WASHINGTON, states:

***“The economic productivity of land as measured by land class is the most important factor contributing to farmers financial success., farm management research has revealed. For this reason, it is very important that prospective farmers examine carefully the physical features of the farm and farming areas in which they might purchase or rent a farm.***

***Land Class I family earnings in 1944 were more than five times as large as those in Land Class 5.***

***Good land Makes good communities. The development of new areas of Land Classes 4 and 5 should be discouraged. New settlers should avoid them, not only because such areas provide very low family earnings per farm, but also because such areas do not provide, out of their own production, socially desirable public services.***

***Farm Mortgage failures for Class 1 soils was 1.7%: for class 2 soils was 5%: for class 3 soils ( jumped) to 10.7: for class 4 soils ( doubled) to 19.4%: and for class 5 soils (it was a whopping) 33.6 % (failure rate).***

***An Economic Land Use Class map should prove to be a valuable guide in adjusting land use in Clark or any other county. Land Classes 1 and 2 in Clark and Cowlitz counties are adapted to intensive crops and / or dairying.”***

Clark County has spent many thousands of tax dollars for consulting firms that create documents to defend agriculture land in the Comprehensive Plan, that is not defensible. Those reports either say there is no agriculture land, when the county wants to increase the urban growth boundaries, or say there is plenty of agriculture land when the county doesn't want to decrease the lot size in rural or resource zoned areas.

The Growth Management Act clearly outlines the process that is to be used by counties, to determine agricultural land. If the land does not comply with the definitions in the RCWs and WACs, using the NRCS USDA Soils Manual, it must be zoned rural land and not agriculture land. Clark County is obligated to follow the law and the court rulings, and to date, that has not happened. No amount of “agriculture committees” and consulting firms can change that fact, and CCCU expects the county to make those corrections in the 2025=2026 update of the Comprehensive Plan.

Sincerely

Carol Levanen, Exec. Secretary

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