

**From:** [Jeffrey Delapena](#)  
**To:** [Bob Minturn](#)  
**Cc:** [Oliver Orjiako](#); [Jose Alvarez](#); [Rebecca Messinger](#); [Robert Nevin](#)  
**Subject:** RE: Planning Commission meeting tonight related to UGA 2025 preferred alternative fir 2025  
**Date:** Wednesday, January 28, 2026 3:33:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

---

Hello Bob,

Yes, I will attach this to the public comment.

Best,



**Jeff Delapena**  
Program Assistant  
COMMUNITY PLANNING

564.397.4558



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**From:** Bob Minturn <bcturn@outlook.com>  
**Sent:** Wednesday, January 28, 2026 3:30 PM  
**To:** Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>  
**Cc:** Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>; Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>; Robert Nevin <rbnevin1@comcast.net>  
**Subject:** RE: Planning Commission meeting tonight related to UGA 2025 preferred alternative fir 2025

Jeff,

One more request, can you also provide the attached “Agricultural Resource Land study” performed for us by Johnson Economics. We must make every effort to make it clear there are

very limited viable agricultural corps we could make ago of on this property without irrigation and surrounded by housing.

Once again, Thank you!

Bob

---

**From:** Jeffrey Delapena <[Jeffrey.Delapena@clark.wa.gov](mailto:Jeffrey.Delapena@clark.wa.gov)>

**Sent:** Wednesday, January 28, 2026 1:31 PM

**To:** Bob Minturn <[bcturn@outlook.com](mailto:bcturn@outlook.com)>

**Cc:** Oliver Orjiako <[Oliver.Orjiako@clark.wa.gov](mailto:Oliver.Orjiako@clark.wa.gov)>; Jose Alvarez <[Jose.Alvarez@clark.wa.gov](mailto:Jose.Alvarez@clark.wa.gov)>;  
Rebecca Messinger <[Rebecca.Messinger@clark.wa.gov](mailto:Rebecca.Messinger@clark.wa.gov)>; Robert Nevin <[rbnevin1@comcast.net](mailto:rbnevin1@comcast.net)>

**Subject:** RE: Planning Commission meeting tonight related to UGA 2025 preferred alternative fir 2025

Good day, Bob,

Thank you for providing feedback related to the Hearing to select the Preferred Land Use Alternative for the 2025 Comprehensive Plan Update.

Your comments will be brought to the attention of Planning Commission ahead of the Jan. 29<sup>th</sup> continuation of the Hearing to select the Preferred Land Use Alternative. This will also be added to the Index of Record.

Best regards,



**Jeff Delapena**  
Program Assistant  
COMMUNITY PLANNING

564.397.4558



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**From:** Bob Minturn <[bcturn@outlook.com](mailto:bcturn@outlook.com)>  
**Sent:** Wednesday, January 28, 2026 12:23 PM  
**To:** Jeffrey Delapena <[Jeffrey.Delapena@clark.wa.gov](mailto:Jeffrey.Delapena@clark.wa.gov)>  
**Cc:** Oliver Orjiako <[Oliver.Orjiako@clark.wa.gov](mailto:Oliver.Orjiako@clark.wa.gov)>; Jose Alvarez <[Jose.Alvarez@clark.wa.gov](mailto:Jose.Alvarez@clark.wa.gov)>;  
Rebecca Messinger <[Rebecca.Messinger@clark.wa.gov](mailto:Rebecca.Messinger@clark.wa.gov)>; Robert Nevin <[rbnevin1@comcast.net](mailto:rbnevin1@comcast.net)>  
**Subject:** RE: Planning Commission meeting tonight related to UGA 2025 preferred alternative fir  
2025

Some people who received this message don't often get email from [bcturn@outlook.com](mailto:bcturn@outlook.com). [Learn why this is important](#)

Good Afternoon, Jeff,

On behalf of the Nevin family please find the attached letter regarding the Nevin property for the planning commission consideration.

Kind regards,

Bob Minturn

---

**From:** Bob Minturn  
**Sent:** Thursday, January 8, 2026 10:32 AM  
**To:** 'Jeffrey Delapena' <[Jeffrey.Delapena@clark.wa.gov](mailto:Jeffrey.Delapena@clark.wa.gov)>  
**Cc:** Oliver Orjiako <[Oliver.Orjiako@clark.wa.gov](mailto:Oliver.Orjiako@clark.wa.gov)>; Jose Alvarez <[Jose.Alvarez@clark.wa.gov](mailto:Jose.Alvarez@clark.wa.gov)>;  
Rebecca Messinger <[Rebecca.Messinger@clark.wa.gov](mailto:Rebecca.Messinger@clark.wa.gov)>  
**Subject:** RE: Planning Commission meeting tonight related to UGA 2025 preferred alternative fir  
2025

Kind regards and much appreciated.

Bob

---

**From:** Jeffrey Delapena <[Jeffrey.Delapena@clark.wa.gov](mailto:Jeffrey.Delapena@clark.wa.gov)>  
**Sent:** Thursday, January 8, 2026 10:25 AM  
**To:** [bcturn@outlook.com](mailto:bcturn@outlook.com)  
**Cc:** Oliver Orjiako <[Oliver.Orjiako@clark.wa.gov](mailto:Oliver.Orjiako@clark.wa.gov)>; Jose Alvarez <[Jose.Alvarez@clark.wa.gov](mailto:Jose.Alvarez@clark.wa.gov)>;  
Rebecca Messinger <[Rebecca.Messinger@clark.wa.gov](mailto:Rebecca.Messinger@clark.wa.gov)>  
**Subject:** RE: Planning Commission meeting tonight related to UGA 2025 preferred alternative fir  
2025

Good day, Bob,

Thank you for providing this feedback ahead of the Joint Hearing to select the Preferred

Land Use Alternative for the 2025 Comprehensive Plan Update.

I am forwarding to additional members of Staff. Your comments will be brought to the attention of the Council and Planning Commission ahead of the Hearing and be added to the Index of Record.

Best,



**Jeff Delapena**  
Program Assistant  
COMMUNITY PLANNING

564.397.4558



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**From:** Bob Minturn <[bcturn@outlook.com](mailto:bcturn@outlook.com)>  
**Sent:** Thursday, January 8, 2026 10:21 AM  
**To:** Jeffrey Delapena <[Jeffrey.Delapena@clark.wa.gov](mailto:Jeffrey.Delapena@clark.wa.gov)>  
**Subject:** Planning Commission meeting tonight related to UGA 2025 preferred alternative fir 2025

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**EXTERNAL:** This email originated from outside of Clark County. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Jeffery,

I am working on trying to upload this for the planning commissions review. I will figure it out but in advance I wanted to share with you to see if you can be a conduit for me.

Obviously as before I appreciate your help and understanding as this probably shows my age

and lack of computer skills.

Respectfully,

Bob Minturn  
(916) 257-4065

Robert Nevin  
2462 SE 11th ave  
Camas,Wa. 98607  
360-600-0418  
rbnevin1@comcast.net

January 28, 2026

County Planning Commission  
& Council

To whom it may concern,

This is in regards to the City of Camas request for expanding their UGA.

“ Nevin 160 Acre Expansion “

Property Account #s,

178669000,178670000,178671000,178664000,178666000,178667000,

178660000,178661000,178662000,178663000,178657000,178658000,17865900,

178613000,17865000.

The above properties are currently on the City of Camas UGA request . We have spent considerable time and money with MacKay & Sposito, developing a comprehensive site plan.

I just want to emphasize that if our property is not included into the Camas UGB. Our family will sell the property as 5 acre parcels for McMansion development . As a third generation Camas community member and property owner I think this would be a loss to the Community of Camas. Depriving Camas and the County from future Jobs, future Tax Dollars, and Smart Development ,by not utilizing this 160 acres in the best possible way for our Camas community.

Sincerely; Robert Nevin



JOHNSON  
ECONOMICS



## AGRICULTURAL RESOURCE LAND ANALYSIS FOR DETERMINATION OF DE-DESIGNATION IN CLARK COUNTY, WASHINGTON

PREPARED FOR  
JORDAN RAMIS  
MAY 2024

**JOHNSON ECONOMICS, LLC**

621 SW Alder St, Suite 506  
Portland, Oregon 97205



**JOHNSON  
ECONOMICS**

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## I. INTRODUCTION

JOHNSON ECONOMICS was retained by JORDAN RAMIS to evaluate a cluster of parcels in Clark County (referenced throughout as the “subject property”) under the Washington Growth Management Act (GMA) to determine if they meet the criteria of agricultural resource lands. These criteria are:

- (a) *The land is not already characterized by urban growth.*
- (b) *The land is used or capable of being used for agricultural production (based on physical characteristics).*
- (c) *The land has long-term commercial significance for agriculture. (WA 365-190-050)*

The analysis will consider site-specific and broader local trends in land use, urban growth, and future potential for agricultural use as detailed in WA 365-190-050. The main components of this study are:

- *Characterization of urban growth around the subject property*
- *Determining if the subject property is primarily devoted to commercial agriculture production.*
- *Analysis of the long-term commercial significance of agricultural production at the subject property*
- *Review of the criteria for agricultural resource lands in the context of the subject property*
- *Assessment of the state of agriculture in Clark County, including agricultural and urban trends.*
- *Recommendations for de-designation of the subject property.*

## II. EXECUTIVE SUMMARY

The property is characterized by urban growth. It is close to the Camas and Washougal urban growth areas, and almost 800 new homes have been built within two miles of the property since 2013. Zoning and land use around the property is primarily residential or rural, with minimal agricultural use.

The availability of public facilities and services is mixed at the subject property. It is within the future service area of the Camas Water District, with a gravity link immediately adjacent. There is good access to schools and emergency services, while the nearest hospital is about 11 miles away.

The soils on the subject property are within a range of classifications and are most suited for growing hay, grasses, or grains, or pasture use. However, the productivity of each of these operations is below a profitable level. The property does not have existing infrastructure to support farming, including appropriate water access.

The property is designated as agricultural land under the Current Use program, a tax deferment that reduces the taxable value of each parcel. However, the property no longer meets the criteria for this designation and will be subject to almost \$600,000 in back taxes upon removal from the program. In addition, the total assessed market value of the parcels is over \$5 million, rendering them infeasible to purchase except for residential use.

Land in Clark County is trending towards more residential use and less agricultural use. From 2017 to 2022, land in farms decreased by 38%. Over that same period, Clark County’s population increased by 48,000 (a 10% increase) and almost 27,000 new residential units (16,000 single-family homes) were permitted.

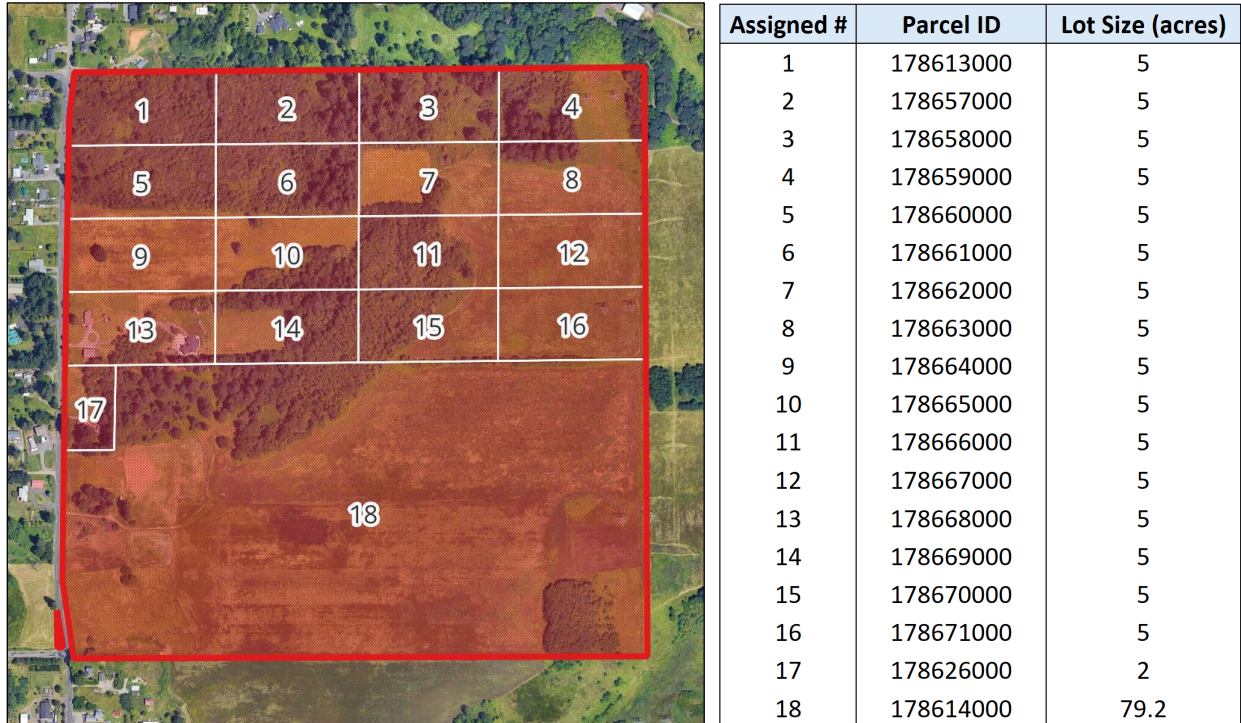
We find that the subject property does not meet the criteria of agricultural resource land as defined by the Washington Growth Management Act, and therefore, we recommend de-designation.



### III. SITE ANALYSIS

The subject property is comprised of 18 parcels that total 161.2 acres. Each parcel has been assigned a number, which we will use to refer to the parcels throughout this report. The parcels are mapped with their assigned numbers below, and each corresponding parcel ID is listed in the table below. Single-family homes are on two of these parcels (178668000 and 178626000).

FIGURE 3.1: PARCELS CONTAINED IN THE SUBJECT PROPERTY



SOURCE: Clark County, Jordan Ramis, JOHNSON ECONOMICS

### PROPERTY BACKGROUND

The sixteen 5-acre parcels have been owned by Robert Nevin since at least 1999. The 79-acre parcel is owned by Robert Minturn and parcel 17 has been owned by the homeowners since 2016.

Parcels 13 and 17 contain occupied single-family dwellings. The home and small second building on parcel 17 were built in 1948. On parcel 13, the first home and second building were built 2009-2011, and the larger, new home was built in 2019. These homes are expected to remain if a change in use of the subject property occurs.



FIGURE 3.2: SATELLITE IMAGE OF OCCUPIED HOMES ON PARCELS 13 & 17



SOURCE: Google Earth, JOHNSON ECONOMICS

Parcel 18 contains a non-occupied single-family dwelling that received a notice of septic system critical deficiency in 2017. The picture below was taken in the same year. We consider the value of the building inconsequential to this analysis.

FIGURE 3.3: NON-OCCUPIED SINGLE-FAMILY DWELLING ON PARCEL 18

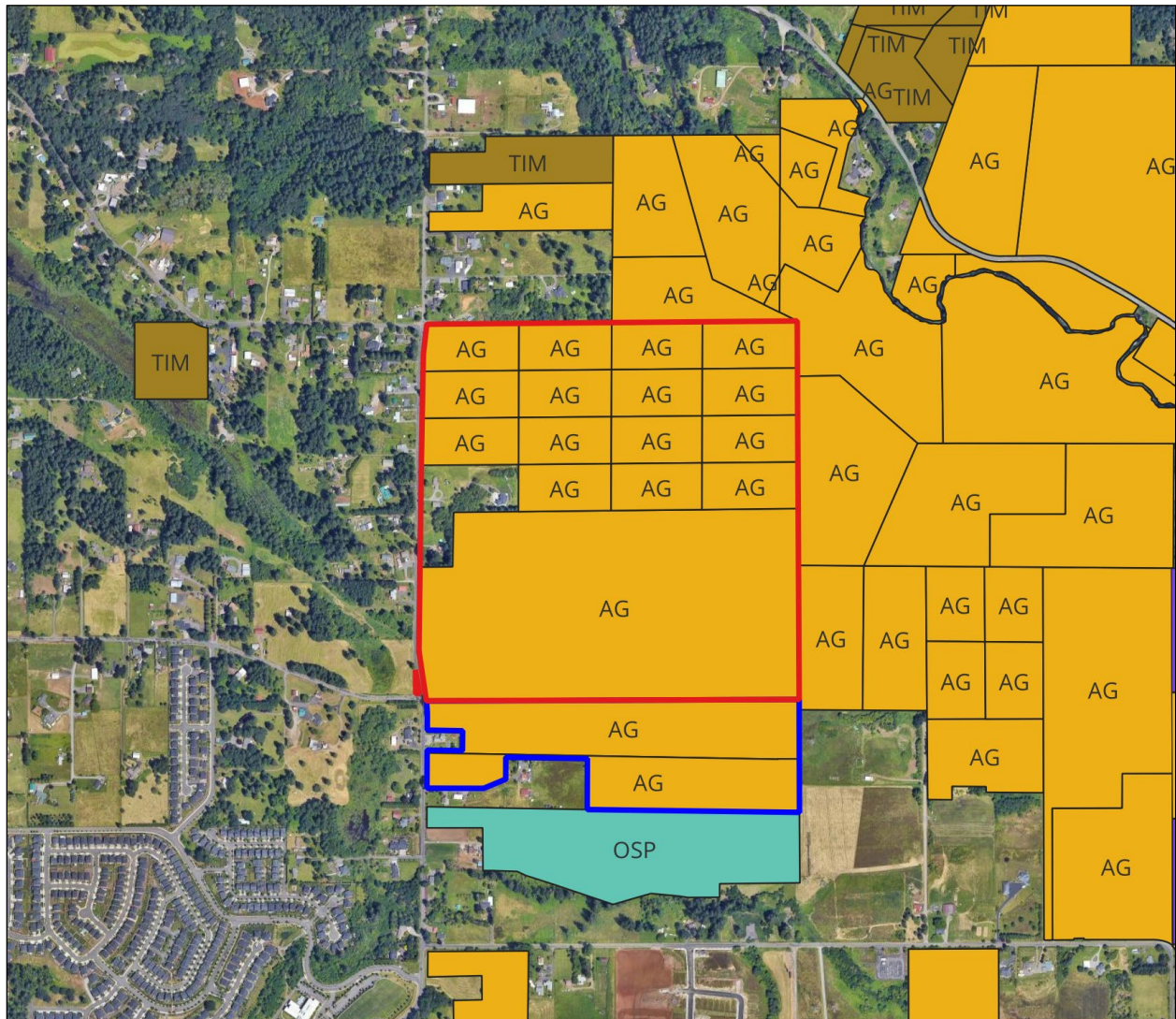


SOURCE: Clark County, JOHNSON ECONOMICS



Sixteen out of the 18 parcels within the subject property, excluding the parcels with occupied homes, are within the Current Use program and have been since at least 2006, according to the Clark County Assessor. Current Use allows open space, timber, agricultural, and forest lands to be taxed at the value of their current use, rather than at their assessed value. This program is a tax deferment, so if the lands are withdrawn, the owner must pay at least seven years of back taxes at the assessed value, plus interest in some cases. This is detailed later in the report. The following map shows the subject property and its Current Use designation of agricultural lands, as well as Current Use designations of the surrounding areas, which are primarily agricultural as well.

**FIGURE 3.4: CURRENT USE DESIGNATIONS, SUBJECT AND SURROUNDING PROPERTIES**



SOURCE: Clark County, JOHNSON ECONOMICS

The northern portion of the subject site is divided into 15 smaller parcels. Each of these is currently allowed a single dwelling unit, and this portion of the site could be developed as rural residential lots within the current entitlements.

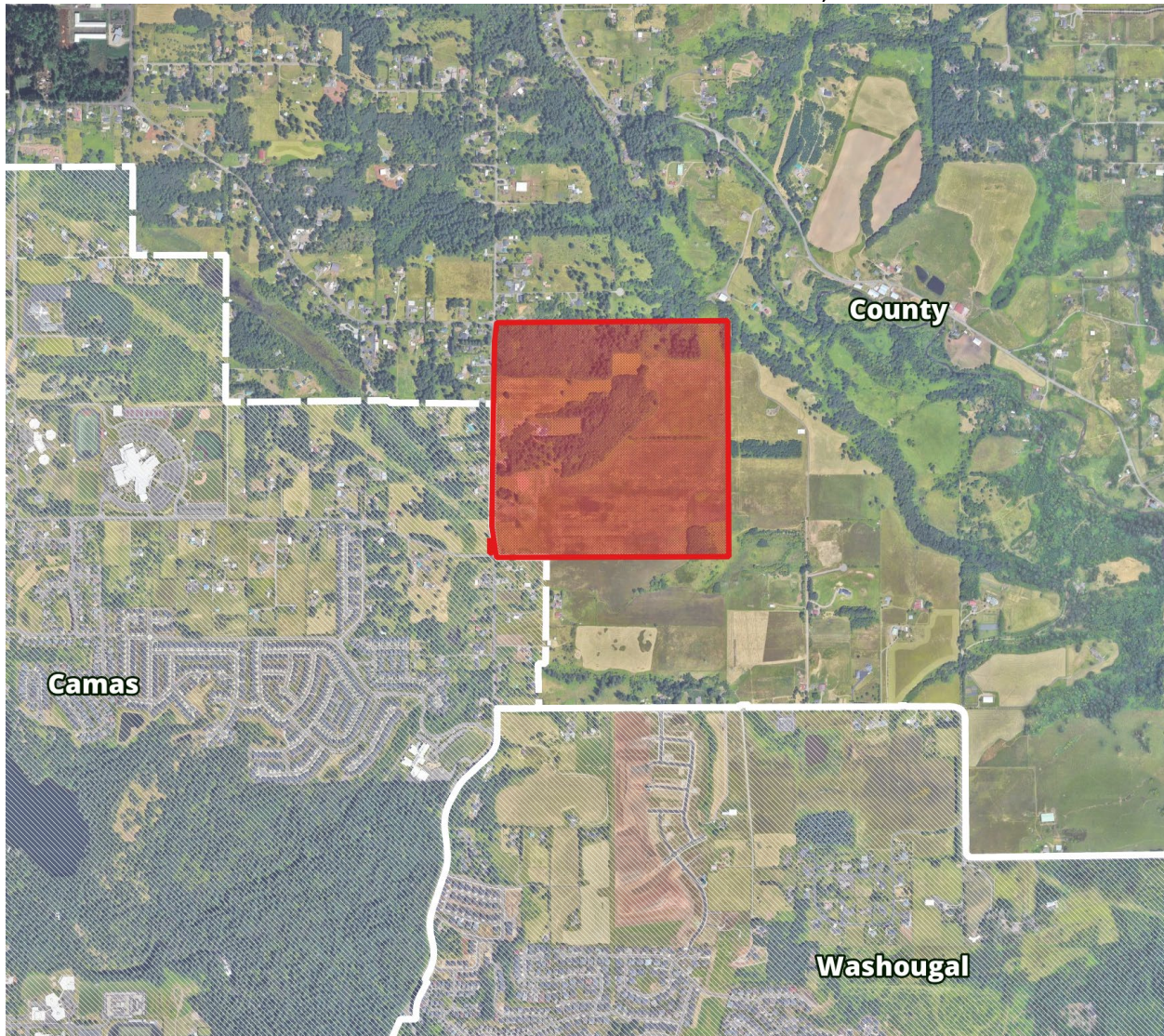


In addition, two parcels immediately south of the subject property (outlined in blue above) were recently listed for sale and they are being considered for a church development, which is a use allowed outside urban areas.

#### IV. CHARACTERIZATION OF URBAN GROWTH

The subject property is adjacent to the Camas Urban Growth Boundary (to the west and south) and is less than half a mile from the Washougal Urban Growth Boundary (to the south). The parcels on the inside edges of these boundaries are zoned for residential use. These boundaries were last updated in 2022, according to Clark County's GIS system.

FIGURE 4.1: CAMAS AND WASHOUGAL URBAN GROWTH AREAS, 2022

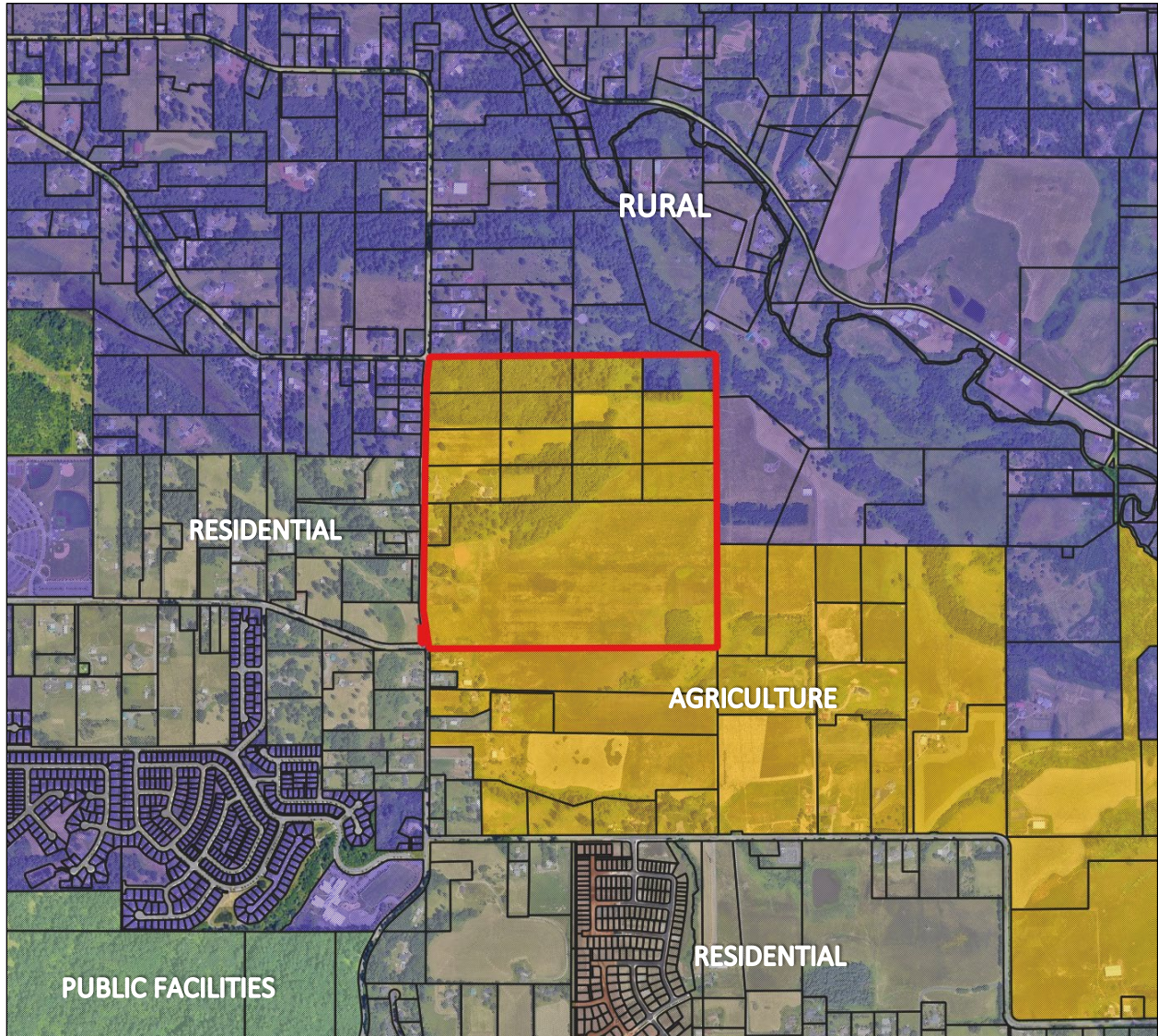


SOURCE: Clark County, JOHNSON ECONOMICS

The subject property is primarily zoned for agricultural use, with one parcel (upper right) zoned Rural (R-10). Rural zoning, which includes residential use, continues to the north and east of the property. The land to the south and southeast of the subject property is also zoned for agricultural use, with the land to the west and farther to the south, inside urban growth boundaries, zoned residential. Of the surrounding parcels with Rural zoning, most are 0.5 to 6 acres in size and contain one home.



FIGURE 4.2: CLARK COUNTY ZONING, SUBJECT PROPERTY AND SURROUNDING



SOURCE: Clark County, JOHNSON ECONOMICS

Within two miles of the subject property, there are two subdivisions that have been built out since 2013 and two subdivisions that are currently under construction. Hills at Round Lake, southwest of the subject site, includes 307 homes and was built in thirteen phases from 2013 to 2018. Magnolia Heights to the south, with 38 homes, began construction in 2020 and finished by the end of 2023. All homes in this subdivision have sold. The two projects under



construction, Northside and Lacamas Hills, represent a total of 432 new home sites. These subdivisions are mapped below.

FIGURE 4.2: NEW SUBDIVISIONS IN PROXIMITY, 2024



SOURCE: Clark County, JOHNSON ECONOMICS

Single-family home development has also increased outside of subdivisions, especially to the south and east of the subject property. To the east, Southeast 269<sup>th</sup> Avenue was paved and extended in 2019, creating two new home sites on parcels designated as agricultural land. Given the proximity of urban growth areas and new residential developments, we determine that the subject property is characterized by urban growth.



## V. CURRENT AGRICULTURAL PRODUCTION

According to the property owners, no crops have been grown on the subject property for at least 30 years, and possibly longer. The following satellite imagery shows natural haying for weed abatement and fire hazard mitigation in 2005, on three of the 5-acre parcels, and in 2009, on nine of the 5-acre parcels. No hay was sold at any point.

FIGURE 5.1: HAYING FOR FIRE & WEED CONTROL IN JULY 2005 AND SEPTEMBER 2009



SOURCE: Google Earth, JOHNSON ECONOMICS



The south half of the subject property has been hayed more recently, but again, only for weed abatement and fire hazard mitigation and the hay was not sold. The following satellite imagery shows haying in 2020 on the 79-acre parcel.

**FIGURE 5.2: HAYING FOR FIRE & WEED CONTROL ON PARCEL 18, AUGUST 2020**



*SOURCE: Google Earth, JOHNSON ECONOMICS*

Within half a mile of the subject site, there are several small-scale farm operations that have produced hay at some point in the last decade. There are at least two small Christmas tree farms. One tree farm is on a 23-acre lot, but less than half of that is used to grow the trees, and the other is on 16 acres, most of which is not farmed. To the northeast is a 115-acre dairy and hay farm. To the southeast, there is a very small-scale, 21-acre farm that grows a variety of produce and sells through a farm stand.

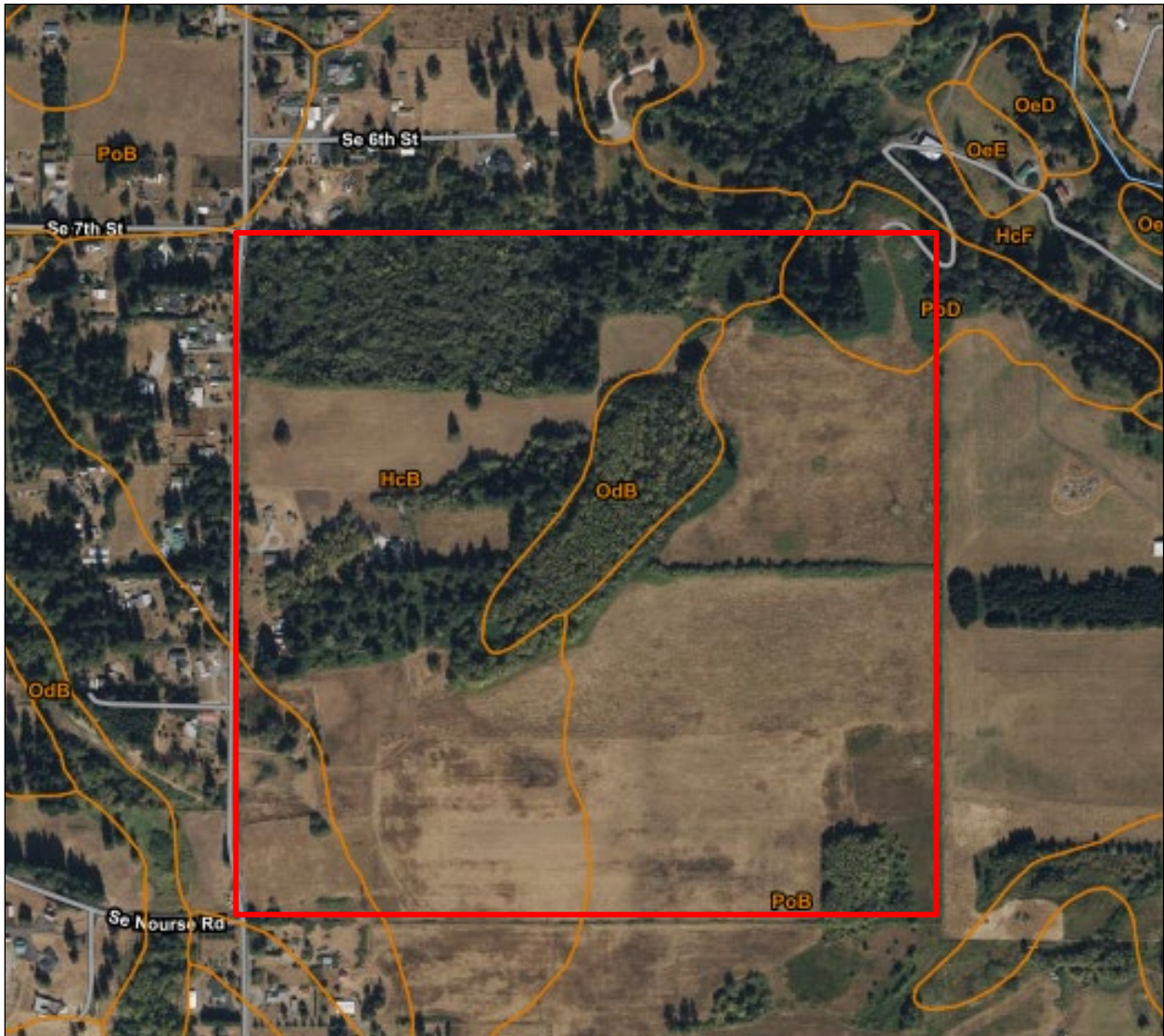
## **VI. COMMERCIAL SIGNIFICANCE FOR AGRICULTURE**

### **LAND CAPABILITY CLASSIFICATION**

Land capability classification refers to the suitability of soils for growing field crops. Class I soils are the most versatile soils and Class VIII the least. Generally, land with soil classified at IV or higher is unsuitable for most crops but may be appropriate for pasture/grazing use. The subject property is about half Hesson clay loam (HcB and HcD), up to 20 percent slopes, on the north and west sides. The land capability classification of these are Class II and Class IV, with subclass *e* (subject to erosion). According to the Clark County Assessor, the most appropriate crops for these types of soils are hay, pasture, and some grasses. The east half of the property is Powell silt loam (PoB and PoD), and a small central area, mostly occupied by trees, is Odne silt loam (OdB). Both of these areas are Class VI, and the most suitable crops are hay, pasture, and some grains and grasses.



FIGURE 6.1: USDA SOIL CLASSIFICATION, 2019



SOURCE: USDA Web Soil Survey, JOHNSON ECONOMICS

### AVAILABILITY OF PUBLIC FACILITIES

To the left of the subject property is Southeast 283rd Avenue, which has two travel lanes, each 10 feet wide, and no shoulders. This is the only road that provides direct access to the site. The posted speed limit is 40 miles per hour, and intersections are controlled with stop signs. No adjacent roads are included in the Clark County Six-Year Transportation Improvement Plan. There is an ongoing project on SE Blair Rd, to the right of the subject property, but this road is not connected to the site.

In the City of Camas General Sewer Plan Update of 2022, the subject property is not included in the future service area. It will be adjacent to the future service area on the west boundary, indicating potential for service farther in the future.



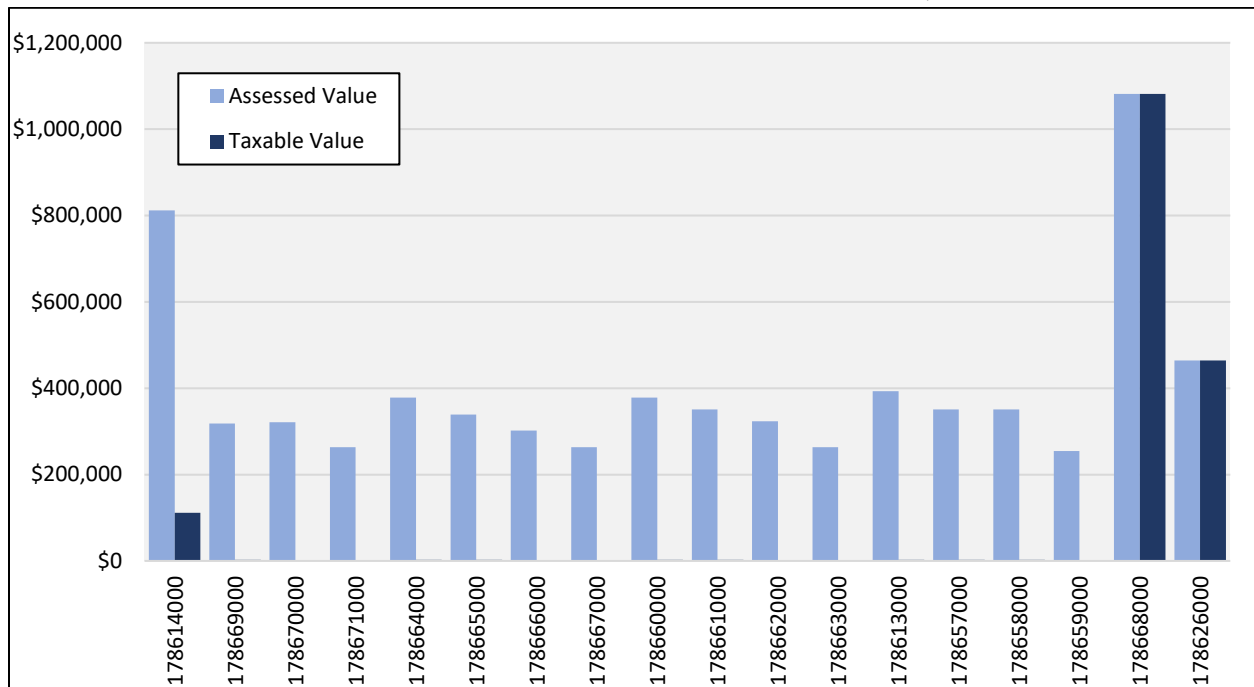
The Camas Water System Plan Update of 2019 shows the subject property within the future water service boundary, though no specific timeline is provided. A water main exists along the west boundary of the property already. The City also has plans to upsize the existing supply lines around the subject property and add a water storage area within two miles by 2035.

The Lacamas Park Trail system is the closest city park to the subject site, about half a mile to the southwest. It offers six miles of hiking trails, with Woodburn Falls at the center and Round Lake to the northwest. A neighborhood park is planned at the Northside subdivision.

## TAX STATUS

Sixteen out of eighteen of the parcels within the subject property are designated under the Current Use program as agricultural lands, so they are taxed at a reduced value from their assessed market value. The graph below illustrates the difference between the assessed value and the taxable value under this program. For most of the parcels, the taxable value is essentially negligible. The last two parcels are not under Current Use, and so are taxed at their full market value.

FIGURE 6.2: ASSESSED VALUE AND TAXABLE VALUE OF SUBJECT PARCELS, 2024



SOURCE: Clark County Assessor, JOHNSON ECONOMICS

The basic definition of farm and agricultural land under Current Use is:

*“any parcel of land or contiguous parcels of land that are 20 or more acres: (i) devoted primarily to the production of livestock or agricultural commodities, for commercial purposes; (ii) enrolled in the federal conservation reserve program or its successor administered by the United States Department of Agriculture; or (iii) other similar commercial activities as may be established by rule... ‘Commercial agricultural purposes’ means the use of land on a continuous and regular basis, prior to and subsequent to application for classification or reclassification that demonstrates that the owner or lessee is engaged in and intends to obtain through lawful means, a monetary profit from cash income by producing an agricultural product” (RCW Chapter 84.34 and 84.33).*



As of April 2024, the parcels are not dedicated primarily to agriculture; some parcels have not been farmed for over 10 years. The parcels will need to be withdrawn from the program since they no longer meet the requirements. According to Clark County Assessor records, the parcels have been designated under Current Use since at least 2006, so removing them from the program would incur only back taxes and interest and no additional penalties. Upon withdrawal from Current Use, we estimate the total back taxes plus interest to be around \$584,900.

### **AVAILABILITY OF PUBLIC SERVICES**

The subject property is 1.5 miles southeast of the East County Fire & Rescue Station 91 in Camas, within the Camas-Washougal Fire District. It is about two miles from downtown Camas and the city police station, though the subject property is within the jurisdiction of the Clark County Sheriff's Office, which does not have a precinct nearby.

The nearest medical center with an emergency department is PeaceHealth Southwest Medical Center, about 11 miles to the west. The hospital is currently expanding their emergency department capacity, with estimated completion in 2025.

The subject property is in the Camas School District, about three-quarters of a mile from Camas High School, half a mile from Woodburn Elementary School, and two miles from Liberty Middle School.

### **PROXIMITY TO URBAN GROWTH AREAS**

The subject property is adjacent to the Camas Urban Growth Boundary, and less than half a mile from the Washougal Urban Growth Boundary. It is within two miles of four subdivisions that were recently built or that are under construction, with a total of almost 800 new home sites. This demonstrates proximity to urban growth areas.

### **PARCEL SIZE**

The parcels range in size from 2 to 79.2 acres, though most are about 5 acres. Two of these, one 5-acre parcel and the two-acre parcel, have at least one residence. Each of the 5-acre sites are allowed a dwelling unit, and the northern half of the site could be developed as rural residential under current zoning.

### **LAND USE PATTERNS & INTENSITY OF SURROUNDING LAND USE**

Immediately surrounding the subject property, to the west, north, and east, are single-family homes on 0.5 to 6 acre lots. There are a few larger lots that, like the subject property, are also under the Current Use program for open space and agricultural land. These include a few small farms that produce hay, one dairy farm with 140 cows, and a small-scale vegetable farm, but there are no large commercial farms close to the subject property. To the south, there are a few parcels of agricultural land, some open space, and then a subdivision under construction. High voltage transmission lines run along the eastern edge of the property in a BPA easement.

New residential development is taking place primarily to the west and south, inside the Camas and Washougal UGAs. As those cities grow, new residential subdivisions will move towards the current UGA boundary and potentially even adjoin the subject property. Agricultural use of the subject property would stand in contrast to anticipated land use patterns of surrounding areas.

### **HISTORY OF PERMITS ISSUED NEARBY**

In the last five years, three subdivision permits have been issued within two miles of the subject property. Magnolia Heights to the south, with 38 homes, was issued permits and began construction in 2020. This project has been completed. Northside, with 280 homes, was permitted in 2020 as well, though construction has been delayed somewhat. Homes began selling this year. Lacamas Hills Subdivision is the newest subdivision, with building permits issued in 2022 for 152 homes in three phases. Permits issued nearby are overwhelmingly residential, indicating again that the subject property is characterized by urban growth.

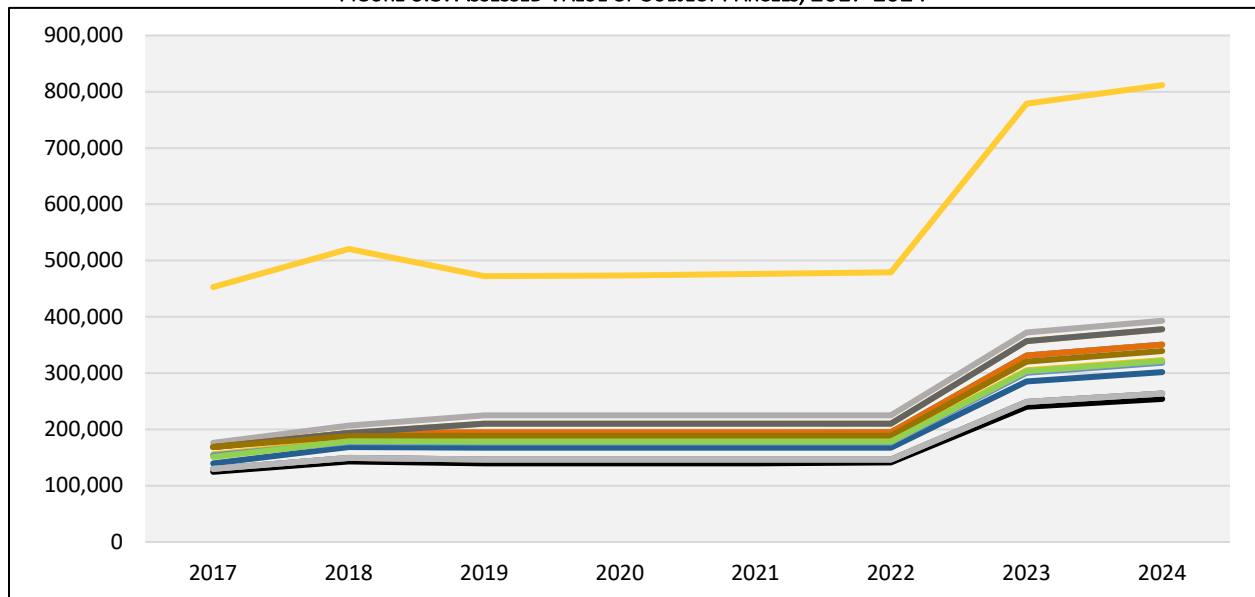


## LAND VALUES UNDER ALTERNATIVE USES

Under the Current Use program, the 5-acre parcels are valued at \$1,400 to \$2,500 per parcel. At fair market value, they are valued from \$250,000 to \$378,000 per parcel. The 79-acre parcel is valued at \$111,000 under Current Use and \$811,800 at fair market value. Parcel #13, which contains two homes, is assessed at over \$1 million. Adjacent parcels with single-family homes have land values in this range, although these parcels are smaller, 3-4 acres. The assessed prices reflect residential development values and are much higher than what a farmer would reasonably pay to use the land for agricultural production.

The assessed land values have also increased significantly over the last few years. The graph below shows the assessed value over time for each parcel. From 2022 to 2023, assessed values increased by 62-70%. A steep increase like this indicates a shortage of land available for residential development.

FIGURE 6.3: ASSESSED VALUE OF SUBJECT PARCELS, 2017-2024



SOURCE: Clark County Assessor, JOHNSON ECONOMICS

## PROXIMITY OF MARKETS

Assuming hay or livestock production (more on this below), distance to markets can be variable. Hay is possible to sell locally, in rural areas of the county, to farmers with small numbers of animals. Larger amounts may be sold farther into the Willamette Valley, but this is less likely at the subject property. Commercial cattle slaughter facilities are farther and fewer in number as food safety regulations become stricter.

## HAY/LIVESTOCK PRODUCTIVITY

As detailed above, hay production and livestock operations are the two possible options for farming at the subject property, especially given land capability and water availability. In Washington State, non-irrigated hay crops yield 1.8 to 3.8 tons per acre. County level data is not available, but a similar report to de-designate a property in Clark County estimated a yield of 2.0 tons per acre, so we will use this number. The USDA Washington-Oregon Hay Report for end of April 2024 estimates sale prices of \$300 per ton for medium quality hays. From these we estimate hay crop revenue to be about \$600 per acre. About 90 of the 161.2 acres at the subject property are currently useable for farming; the remaining area has homes or trees. This gives total estimated revenue from hay production of \$54,000. Costs would include equipment, fertilizer, and labor, none of which are currently in use at the subject property.



The second possible use of the subject property is pasture grazing. We use cow-calf pairs as an example. A single cow-calf pair needs about two acres for grazing, and a barn and equipment would also be needed. With these assumptions, up to 40 calf-cow pairs could be supported on the subject property. The operations analyzed in USDA budgets have 138 cows and an annual calf crop of 104 animals, which is considered small scale, but is more than twice as large as what is possible on the subject property. The USDA budget estimates the net value per calf sold at a loss of \$359, removing this as a profitable option. Additionally, with cattle production comes concerns for mud, odor, and nuisance conflicts with nearby residential areas.

The most significant cost associated with farming the subject properties, however, is the cost of buying or renting the land. The assessed market value of the subject property, excluding the parcels with homes, is \$5.6 million. While there are no comparable farm sales in the area, it is very unlikely that a farmer would pay that much for a small-scale farming operation. It is not economically feasible to conduct agricultural operations on the subject property, and therefore, the subject property does not have long-term commercial significance for agriculture.

## VII. WATER RIGHTS

Water right holders in Washington State, including Clark County, may hold one of two broad categories of water rights: a groundwater right or a surface water right. A groundwater right allows for water to be withdrawn from a well. Groundwater rights may allow for a range of uses. However, groundwater use for domestic and industrial uses of up to 5,000 gallons per day each, irrigation of up to half an acre, and stock water in an unlimited amount, which is water for livestock, are groundwater uses that are “exempt” from the requirement to obtain a permit. However, even though these uses are exempt from a permit requirement, a water right user with a claim to this type of use must submit a claim to the Department of Ecology. A surface water right allows a property to use water diverted from a river, creek, lake, or similar. Consumptive water use, which can include consumptive use of groundwater or consumptive use of surface water describes water use that removes from a water supply without returning to the supply; examples include irrigation and manufacturing water use.

Three of the parcels within the subject property have an associated groundwater claim. The largest parcel (79 acres) is the place of use for a groundwater claim for general domestic or stock water purposes. Parcel 10, which is one of the 5-acre parcels, has groundwater rights for domestic use, irrigation of half an acre, and stock water purposes. The 5-acre parcel on the northwest corner of the site holds groundwater rights for domestic use only.

None of the water right claims at the subject property are for irrigation of an agricultural crop, which means that there is no right or claimed right that would allow irrigation on the property beyond one half acre. This prevents the production of high value crops, such as berries and vegetables.

Options for additional water use are also limited. As an unofficial policy, the Washington State Department of Ecology is not issuing new water rights in Clark County. Buying existing rights would cost up to \$3,000 per acre, according to Clark County farmer Bill Zimmerman, assuming that those rights are available. Another option is to buy public water, supplied to the subject property from the City of Camas, which may be as expensive yearly as buying existing rights, Zimmerman estimates.

## VIII. THE STATE OF AGRICULTURE IN CLARK COUNTY

The Washington GMA specifies that a countywide analysis must be conducted in order for cities and counties to designate natural resource lands (including agricultural lands) within the county. This Comprehensive Plan is required by the Washington GMA to be updated by the end of 2025, after its last update in 2016. In lieu of this full countywide analysis, we include a summary of the state of agriculture and urban development in Clark County.

As of 2022, there were just over 1,900 farms in Clark County, according to the USDA. This includes 56,000 total acres, down 38% from 2017, when there were over 90,000 acres of land in farms. However, the number of farms in the



county only decreased by 3%, suggesting that either a few large farms have ceased operations or that many farms have decreased in size.

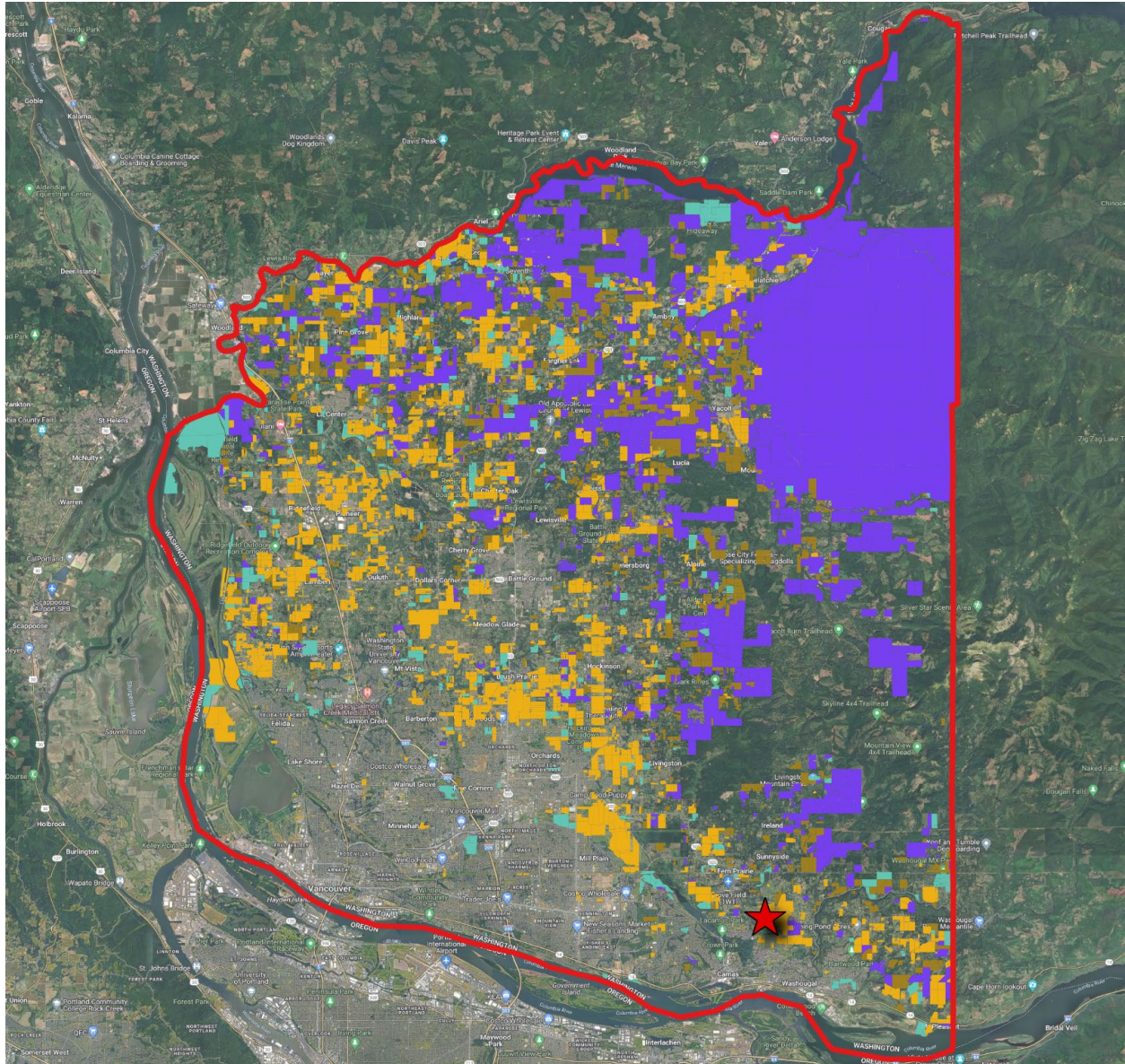
On average, farms in Clark County are primarily small in size and scale: almost 70% of farms make less than \$5,000 in sales, and almost 90% of farms are smaller than 50 acres. Average farm-related income increased 132% from 2017 to 2022, but average net cash farm income is still negative at -\$230.

The most produced crops in Clark County, by acreage, are hay (13,500 acres), Christmas trees (910 acres) and berries (855 acres). This is in line with current and historic crop production at and around the subject site.

Natural resource lands in Clark County are designated under the Current Use program, as described earlier in this report. About 36% of the county's land by area is classified under this program. Of the total land in Current Use, 25% is agricultural land (yellow), and the rest is open space (teal), designated forest land (purple), or timber land (brown). The subject property makes up about 0.5% of total agricultural land area in Clark County.



FIGURE 7.1: CLARK COUNTY LAND UNDER CURRENT USE, 2024



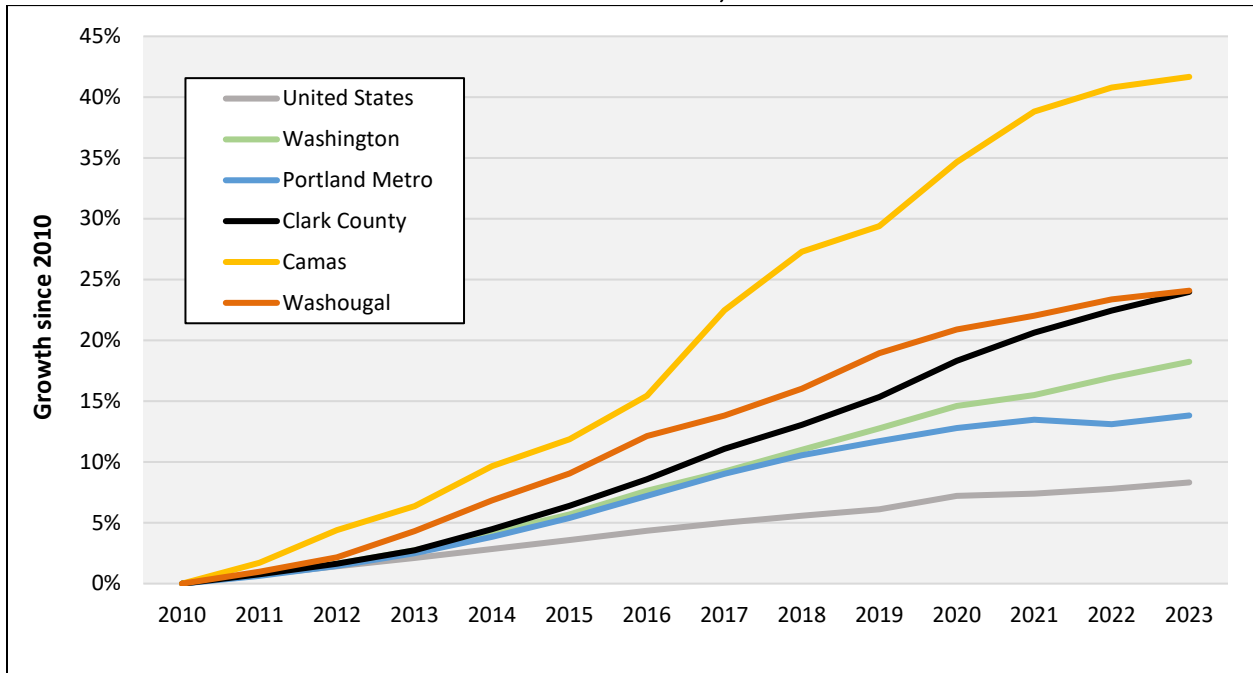
SOURCE: Clark County, JOHNSON ECONOMICS



### POPULATION TRENDS

The county has seen population growth of almost 25% since 2010, which is equivalent to just over 100,000 people. Over that same period, Camas saw a 42% increase in population, while Washougal's growth rate was on par with the county's. All three geographies are growing faster than the Portland Metro Area and the state.

FIGURE 7.2: POPULATION GROWTH SINCE 2010, GEOGRAPHIC COMPARISON



SOURCE: U.S. Census Bureau, Portland State University, WA Office of Financial Management, JOHNSON ECONOMICS

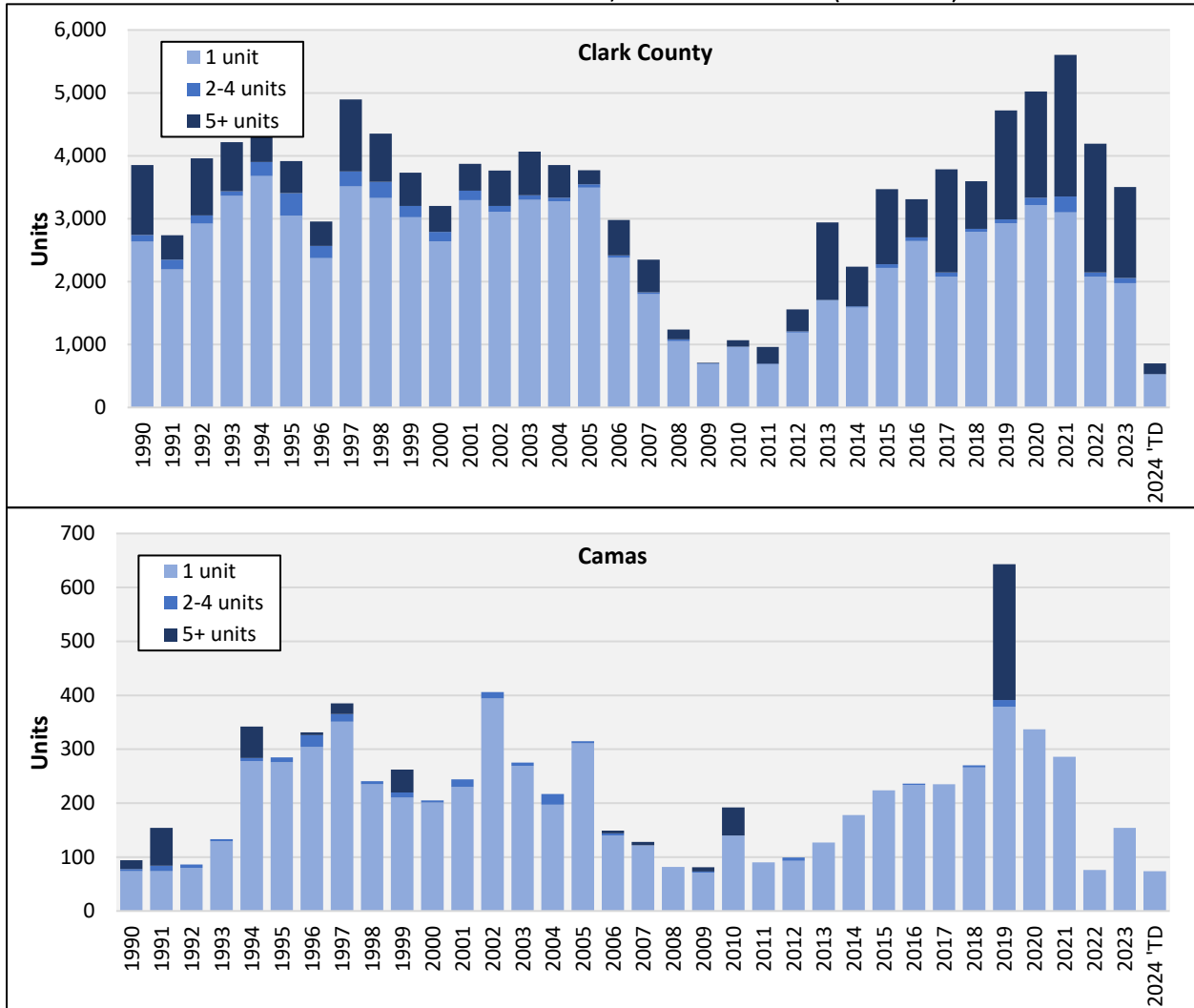
### THE STATE OF HOUSING IN CLARK COUNTY

The increasing population in the county indicates a need for more housing, especially in fast-growing areas such as Camas. Recent housing construction in Clark County has roughly been on par with the 1990s, when the county experienced a suburban boom. However, the share of multifamily units has increased considerably, while single-family construction is below the 1990s level.

The pattern is similar in Camas, which has seen higher population growth compared to the county but is more land constrained. The city has seen a few larger multifamily projects in the last few years, though apartment construction is nowhere near Vancouver levels.



FIGURE 5.15: RESIDENTIAL BUILDING PERMITS, CLARK COUNTY & PMA (1990-2023)



SOURCE: U.S. Department of Housing & Urban Development, Johnson Economics

The disparity between single-family and multifamily construction in Camas is partly due to the city’s position as a Portland suburb. Subdivisions of medium to large single-family homes, which require more land area than multifamily homes, are the primary form of residential construction in suburbs. Camas does not have the land area for large new residential developments, such as the Hills at Round Lake, without de-designating some of its agricultural land.

In 2015, the Camas 20-Year Comprehensive Plan projected a need for 3,868 new housing units by 2035. Since 2015, about 2,300 residential units have been permitted, the vast majority of which (87%) are single-family homes. The city is not meeting its allotment of middle- and higher-density housing as outlined by the county. Camas is required to plan for about 765 middle housing units and 2,380 apartment units between 2025 and 2045. Tentative site plans for the subject property include up to 184 cottages and townhomes; this would meet 24% of the city’s allotted middle housing units. De-designation of the subject property could support higher density housing in Camas.



## IX. RECOMMENDATIONS

It is our opinion that the subject property does not meet the criteria of agricultural land as laid out in the Washington Growth Management Act and is therefore recommended for de-designation as agricultural land:

- The property is characterized by urban growth. It is adjacent to the Camas UGB and less than half a mile away from two large (250+ unit) subdivisions, either recently completed or under construction. Camas is a fast-growing city that is running out of buildable land; its population has grown by over 40% since 2010.
- The property is not currently being farmed and no longer meets the criteria to be classified under Current Use for Farm and Agriculture, which will obligate the property owners to pay back taxes and interest estimated at \$584,900. Additionally, the market value of the parcels is about \$5.6 million, which would be a prohibitive cost for any use except residential. The only economically feasible way forward is to develop the parcels for residential use.
- The subject property lacks adequate water permits for commercial agricultural production, and it is not practical to buy existing rights or pay for public water use. This limits the types of farming on the site to hay and livestock operations primarily, which are not considered to be profitable on the subject property.