From:	Cnty 2025 Comp Plan
To:	"Garrett.West@jordanramis.com"
Cc:	Oliver Orjiako; Rebecca Messinger
Subject:	FW: 1 of 3 New Record Submissions: Periodic Update (2026-S-14100 and 2026-S-14101)
Date:	Friday, October 2, 2026 1:48:00 PM
Attachments:	image001.png image002.png Ltr 1 of 2 to Clark County re GMA. 10.2.2026 FINAL (compressed).pdf image003.png image004.png image005.png image006.png

---

Hello Garrett,

Thank you very much for submitting Jordan Ramis' comments related to the 2025 Comprehensive Plan update.

Confirming this has been received and will be added to the Comprehensive Plan Index of Record.

Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558

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From: Garrett K. West <Garrett.West@jordanramis.com>
Sent: Friday, October 2, 2026 12:19 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Cc: Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>
Subject: 1 of 3 New Record Submissions: Periodic Update (2026-S-14100 and 2026-S-14101)

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.

Hello Clark County,

Would you kindly confirm receipt of this email? This is a written submission to the record.

The attached letter had to be broken into two parts to send to you. Additional emails to follow.

Reach out if you have any questions or would like to discuss.

Thank you,

Garrett K. West | Attorney
Direct: (503) 598-5528

JORDAN RAMIS

1211 SW Fifth Ave, Suite 2700
Portland OR 97204

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Portland | Bend | Vancouver WA



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October 2, 2026

VIA E-MAIL

Clark County
c/o Oliver Orjiako, Community Planning Director
Oliver.Orjiako@clark.wa.gov

Re: **Summary of Agricultural Land De-Designation**
Submission to the Record – Periodic Update to the Comprehensive Plan and Development Regulations (2026-S-14100 and 2026-S-14101)

Dear Councilors,

Here is a summary of how lands can be changed from agricultural to urban use.

In order to expand the Urban Growth Areas for Camas, Ridgefield, and La Center, the County will need to remove (or 'de-designate') the agricultural resource labels. State law says land should be classified as agricultural if it meets the tests found in WAC 365-190-050. Because the properties in question no longer meet those standards, they can be de-designated.

Test 1: Is the land in the process of being urbanized? – WAC 365-190-050(3)(a)
Standard: Land characterized by urban growth should not be classified as agricultural land. The Washington Supreme Court has explained: "*territory already committed to the process of growing in a manner incompatible with rural uses can be considered for an urban designation, and indeed it would be inconsistent with the goals of the GMA not to * * *.*"[1] (emphasis added).

Some reasons the lands have become characterized by urban growth:

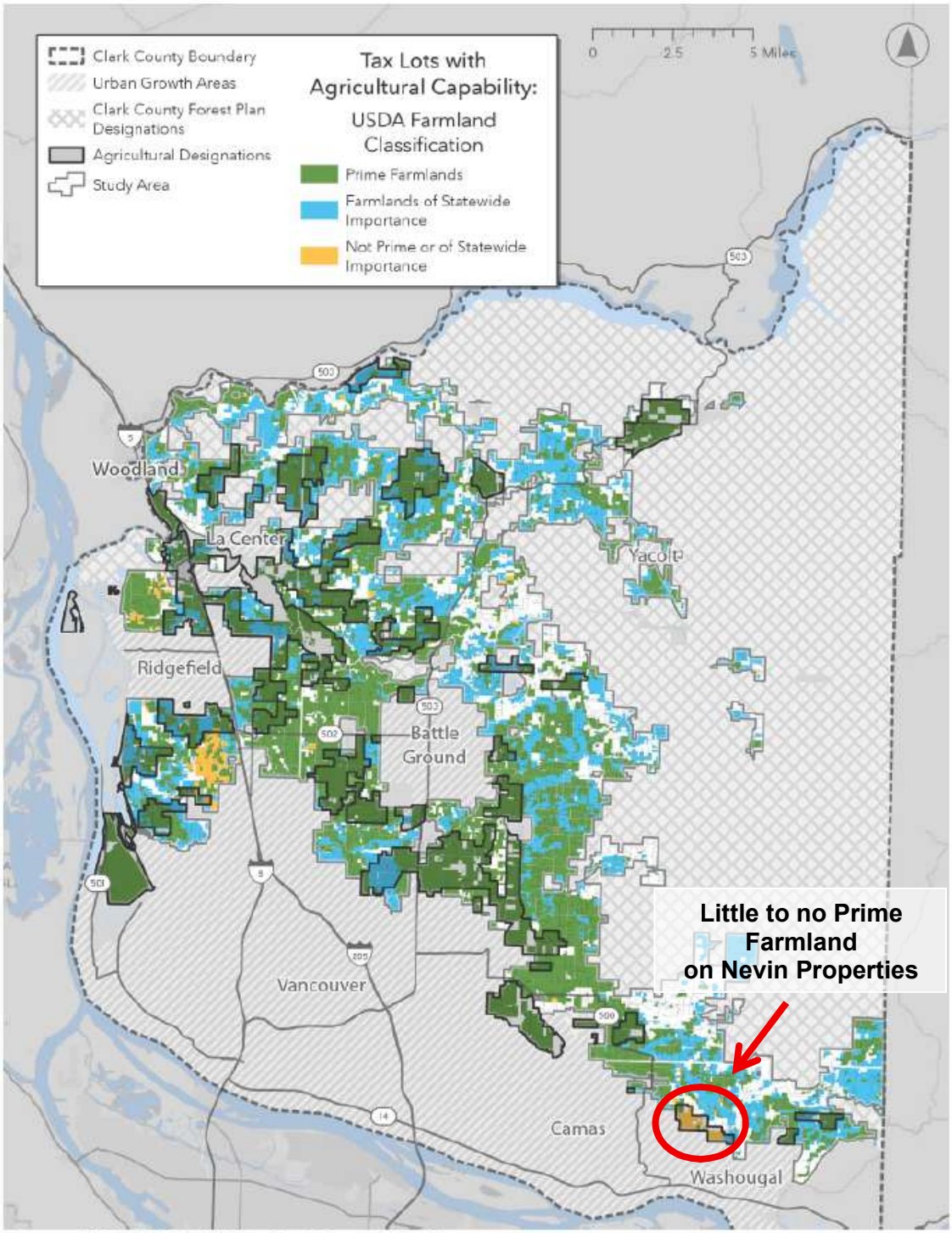
- They sit right next to existing city limits or existing urban growth areas, such as the Discovery Corridor which extends from Salmon Creek north to Ridgefield;
- They are surrounded by hundreds of new homes, schools, shopping centers, and businesses;
- They have city water, power, roads, and services already nearby;
- *Example*: Camas area has 800 new homes built within two miles since 2013.

On the next page is a map from the County's Agricultural Lands Study (2025) showing how lands near Camas and Washougal have little to no prime soils. The whole study is attached to this letter.

Also attached are various on-the-ground photos from different places in Clark County detailing the ongoing development of land.

[1] *Quadrant Corp. v. Cent. Puget Sound Growth Mgmt. Hr'gs Bd.*, 154 Wn.2d 224, 240-41, 110 P.3d 1132 (2005).

Exhibit 21. Primary Farmland Classifications



Source: USDA NRCS (2024), Clark County (2025)

Test 2: Can the land *actually* be farmed? – WAC 365-190-050(3)(b)

Standard: If land is not physically suited for farming based on soil quality, water availability, and practical use then it should not be classified as agricultural.

- **Poor soils**: Most soil is Class IV or VI — suitable only for hay or grazing, not valuable crops;
- **No water**: Properties lack irrigation rights needed to grow anything beyond hay; getting new water rights is nearly impossible;
- **Not being farmed**: Most parcels haven't grown commercial crops in 30+ years; some do occasional haying to avoid tax penalties;
- **Too small/fragmented**: Broken into small parcels surrounded by houses; not workable farm operations.

Test 3: Does the land have long-term value for farming? – WAC 365-190-050(3)(c)

Standard: If land is not commercially viable for agricultural use over the long term then it should not be classified as agricultural.

- **Land values are too high**: The properties are worth millions based on potential development value — no farmer could afford to buy them to farm;
- **Changing infrastructure**: Roads exist but serve mostly residential traffic now, not farm transport;
- **Many urban services** (fire, police, schools, water) are nearby, so the land is more suited to housing or commercial uses than farming;
- **Surrounded by incompatible uses**: Farming next to subdivisions creates conflicts (odor, noise, pesticide and herbicide spraying, mud);
- **Can't make money farming**: Even best-case hay production would generate only approximately $35,000–$148,000 per year *before* costs — not enough to justify multi-million-dollar land values;
- **No commercial operations**: Only hobby farms, small horse facilities, or vacant land remain.
- **Not near farming markets**: Limited local hay market.

For these reasons, WAC 365-190-050 authorizes the county to de-designate the properties from agricultural to allow planning for urban development.

Thank you for your assistance in this GMA update.

Sincerely,

JORDAN RAMIS PC

Garrett K West

ECOnorthwest

November 2025

Clark County Agricultural Lands Study

Clark County Planning & Development Department

ECOnorthwest
920 SW 6th Ave • Suite 1400 • Portland, OR 97204 • 503-222-6060

Acknowledgments

ECOnorthwest prepared this report with support from the guidance and input of several partners, including members, staff, and leadership of the Clark County Community Planning Department. Most notably we are appreciative of the involvement and input of Oliver Orjiako, Jose Alvarez, Christine Cook, and Susan Ellinger. We are appreciative of the input provided by the Clark County Agricultural Lands Commission. Other firms, agencies, and staff contributed to other research that this report relied upon, specifically Triangle Associates who coordinated public input for this project. This work was financially supported by Clark County.

That assistance notwithstanding, ECOnorthwest is responsible for the content of this report. The staff at ECOnorthwest prepared this report based on their general knowledge of the economics of recreation, amenities, and regional economies. ECOnorthwest staff contributing to this study included Barrett Lewis, Robert Parker, Jennifer Cannon, Kelsey Johnson, Marty Marquis, Katharine Nester, and Mia Oscarsson. ECOnorthwest also relied on information derived from government agencies, private statistical services, the reports of others, interviews of individuals, or other sources believed to be reliable. ECOnorthwest has not independently verified the accuracy of all such information and makes no representation regarding its accuracy or completeness. Any statements nonfactual in nature constitute the authors' current opinions, which may change as more information becomes available.

For more information about this report please contact:

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1. Introduction

This report documents the 2025 Clark County Agricultural Lands Study, prepared as part of the County's 2025–2045 Comprehensive Plan update. The purpose of the study is to evaluate whether Clark County's existing agricultural resource land (ARL) designations remain consistent with state law and to assess whether other lands may qualify for ARL designation under Washington Administrative Code (WAC) 365-190-050.[1]

Background

Clark County is in the process of a required update of the Clark County Comprehensive Growth Management Plan. Clark County's Comprehensive Growth Management Plan (Comprehensive Plan) is meant to accommodate and guide population and employment growth for the next 20 years.[2] Counties are required to review their natural resource land designations whenever they consider changes to resource land designations during a periodic update of the comprehensive plan. These studies ensure that designations remain consistent with state criteria and reflect current conditions. Clark County initiated this study in response to site-specific proposals from landowners requesting agricultural designation changes that received support from nearby jurisdictions.

The study uses a structured, data-based approach consistent with the framework in WAC 365-190-050 and guidance from the Washington Department of Commerce. The analysis relies on geographic information system (GIS) data, federal, state, and county datasets, and established criteria for determining whether lands are characterized by urban growth, used or capable of agricultural production, and whether they demonstrate long-term commercial significance. The approach is designed to be legally defensible and consistent with state statutes, administrative rules, and case law. It provides a transparent and data-informed basis for evaluating Clark County's agricultural resource lands. The intent of this study is not to make recommendations for designation changes, but instead to provide Clark County Council information about the agricultural area for their own determinations on the matter.

Purpose

The purpose of the 2025 Agricultural Lands Study (this report) is to provide the Clark County Council with a comprehensive, data-informed evaluation of agricultural resource lands in unincorporated Clark County consistent with WAC 365-190-050. The Washington

[1] *Washington Administrative Code* (WAC). § 365-190-050. https://app.leg.wa.gov/wac/default.aspx?cite=365-190-050

[2] Clark County Comprehensive Growth Management Plan update website: https://clark.wa.gov/community-planning/comprehensive-growth-management-plan

State Growth Management Act[3] requires this type of study as a prerequisite when counties are considering changes to their natural resource land designations as part of a periodic comprehensive plan update. This study is intended to validate agricultural resource land designations, which will serve as a technical foundation for any modifications to agricultural land designations as part of the 2025–2045 Comprehensive Plan update.

The study evaluates non-Forest or Mineral rural resource lands (the study area includes lands in agricultural and rural Comprehensive Plan designations) outside the existing urban growth areas and other areas characterized by urban growth to determine their suitability for agricultural resource land designation. It assesses both currently designated agricultural resource lands and other lands within the study area that meet state-established criteria for designation.

The findings in this report provide the Clark County Council with a technical basis for its own determination of whether to make changes to agricultural land designations. This study does not include recommendations for specific designation changes; the Council will determine all next steps and any potential policy updates which could be informed by this analysis, public engagement findings, and other considerations.

Policy Context

The legal basis for this study is Washington's Growth Management Act (GMA) and its implementing regulations in the Washington Administrative Code (WAC). A more detailed discussion of state policies is included in Appendix A: Policy Framework.

In 1990, the Washington State Legislature enacted the GMA. Planning Goal 8 addresses natural resource industries:

> *"Maintain and enhance natural resource-based industries, including productive timber, agricultural, and fisheries industries. Encourage the conservation of productive forestlands and productive agricultural lands, and discourage incompatible uses."*[4]

The focus is on supporting economic activity in natural resource industries and the goal acknowledges that land is a foundational element for maintaining those industries.

To help implement Planning Goal 8, the GMA requires counties to identify, designate, and conserve rural resource lands with long-term commercial significance for agriculture, forestry, and mining consistent with WAC 365-190-050.[5] Clark County first inventoried natural resource lands (including agricultural lands) in 1994.[6]

---

[3] *Revised Code of Washington* (RCW) 36.70A. "Growth Management—Planning by Selected Counties and Cities." https://apps.leg.wa.gov/rcw/default.aspx?cite=36.70A.
[4] *Revised Code of Washington* (RCW) 36.70A.020. "Planning goals." https://app.leg.wa.gov/rcw/default.aspx?cite=36.70a.020
[5] WAC 365-190-050: https://app.leg.wa.gov/wac/default.aspx?cite=365-190-050.
[6] https://clark.wa.gov/media/document/207811

The GMA establishes the foundational goal (Planning Goal 8) to conserve productive agricultural lands and directs counties to make the conservation and enhancement of the agricultural industry an objective of their long-range planning. This state-level policy is implemented through a series of statutes and administrative rules that define agricultural land and establish the process for its designation.

When a county reviews its natural resource land designations, WAC 365-190-040(10)(c)[7] requires that any potential designation changes be justified by meeting at least one of five specific criteria. For the purposes of this study, the most relevant criterion is (iv), which allows for changes based on: "new information on natural resource land or critical area status related to the designation criteria in WAC 365-190-050(3)." This study is intended to provide that new information.

The core analytical framework guiding this analysis is therefore WAC 365-190-050(3).[8] This rule establishes a guiding framework for identifying and designating agricultural resource lands based on a mandatory three-part test:

> *(1) Lands should be considered for designation as agricultural resource lands based on three factors:*
>
> *(a) The land is not already characterized by urban growth.*
>
> (b) *The land is used or capable of being used for agricultural production.*
>
> (c) *The land has long-term commercial significance for agriculture.*

This study is structured to systematically apply this three-part test into a consistent and data-driven evaluation.

Organization of this Report

This report is divided into three sections. Section I provides background on Clark County's agricultural landscape, outlines the study's purpose and legal framework guiding this work. Section II, Methods and Analysis, describes the datasets and analytical framework used in the evaluation. Further in-depth analysis of relevant statues and regulations pertaining to Agricultural Resource Lands Studies, as well as pertinent legal case law, can be found in Appendix A. In addition, Appendix B provides a summary comparing different agricultural study methods used by other counties in Washington State. Appendix C summarizes community input received during the public engagement process conducted in coordination with County staff, advisory bodies, and stakeholders.

This report also includes three separate appendices:

[7] *Washington Administrative Code* (WAC). § 365-190-040(10)(c). https://app.leg.wa.gov/wac/default.aspx?cite=365-190-040

[8] *Washington Administrative Code* (WAC). § 365-190-050(3). https://app.leg.wa.gov/wac/default.aspx?cite=365-190-050

- Appendix A: Policy Context
- Appendix B: Review of Methods used by Other Counties
- Appendix C: Public Input Summary

2. Methods and Analysis

This study applies the three-part test for designating agricultural lands from WAC 365-190-050(3)[9] through a structured, data-based approach. The analytical framework for this analysis consists of the following four steps:

1. Establish the Study Area
2. Identify the Agricultural Land Base
3. Analyze Long-term Commercial Significance
4. Summarize Results

This section follows the steps of the analytical framework. It begins by defining the study area, then outlines the process for identifying the agricultural land base through analysis of urban growth and production capability. Next, it evaluates each factor listed in WAC 365-190-050(3)(c) to determine its relevance as an indicator of long-term commercial significance, including an overview of food security. Finally, using the indicators identified as most significant, the analysis cross-references the agricultural land base to produce key findings presented in maps and tables.

Establishing the Study Area

The first step of the analysis was to establish a consistent study area to serve as the geographic foundation for the entire evaluation. This initial study area is designed to be intentionally broad, creating a comprehensive inventory from which more specific agricultural lands are identified in subsequent analytical steps. The rationale for this broad approach is grounded in WAC 365-190-050(3)(b), which requires the analysis to consider lands that are not only currently *used* for agriculture but also those that are "*capable* of being used for agricultural production."

To meet this requirement, the study area includes all tax lots within unincorporated Clark County that have plan designations related to both agricultural resource and rural land. This ensures the analysis captures potentially capable lands that may exist outside of the current agricultural designations. The specific Comprehensive Plan designations included are:

- Agriculture
- Agricultural-Wildlife
- Rural-5
- Rural-10

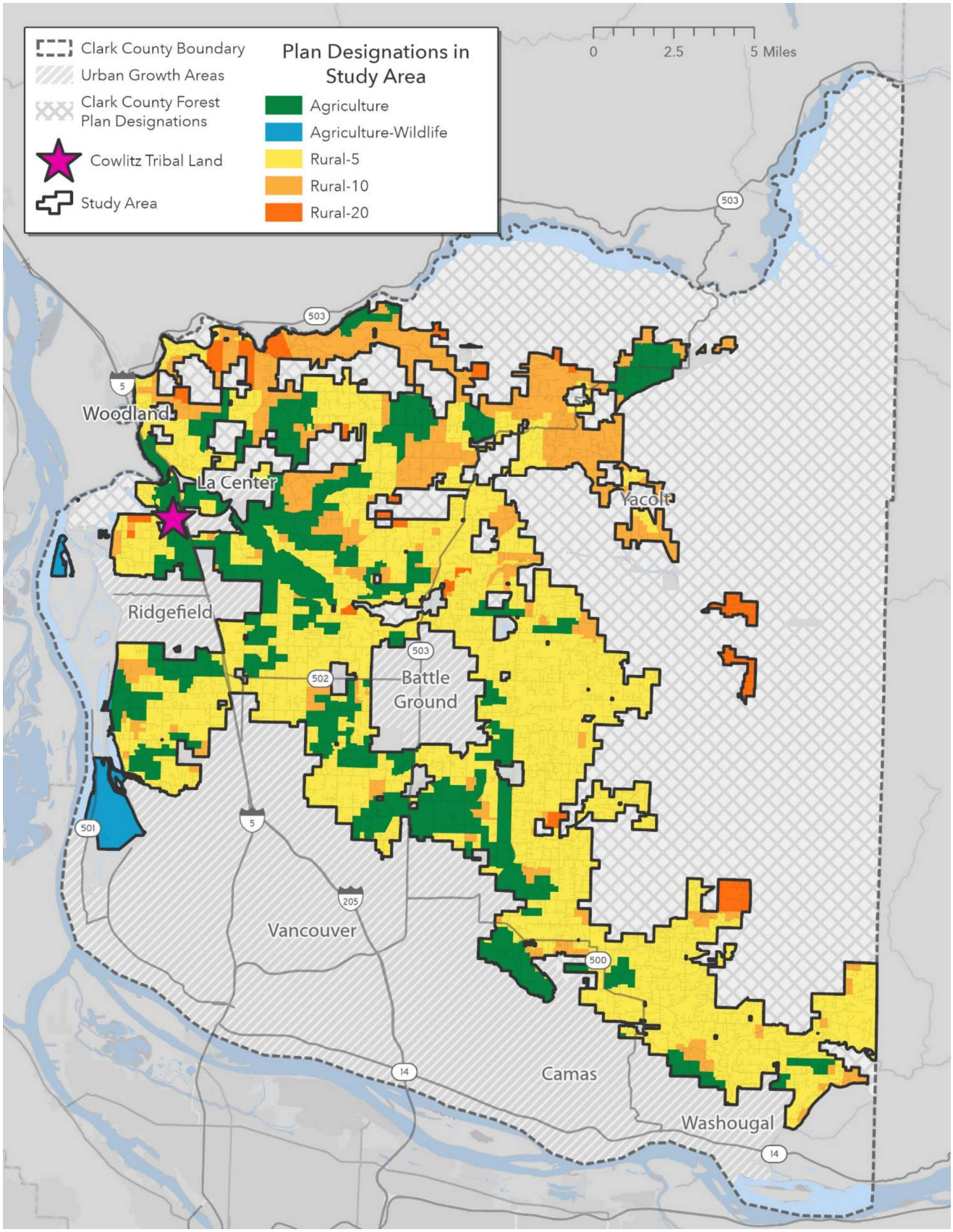
[9] *Washington Administrative Code* (WAC). § 365-190-050(3). https://app.leg.wa.gov/wac/default.aspx?cite=365-190-050

- Rural-20

By design, all lands within incorporated city limits and their existing adopted Urban Growth Areas (UGAs) are excluded from this initial study area, as well as lands in Trust for the Cowlitz Indian Tribe. Rural Centers (LAMIRDS) are also excluded from the Study Area. This broad collection of lands serves as the starting point for the analysis. It is filtered in the next step to identify the "agricultural land base." Note that the agricultural lands in the Columbia River Gorge National Scenic Area were excluded for this study.

Exhibit 1 shows a map of these Comprehensive Plan designations, as well as Cowlitz Tribal lands that have been excluded, which together form the geographic boundary for this study.

Exhibit 1. Clark County Agricultural Lands Study Area Plan Designations



Source: Clark County (2025)

This group of lands within the study area totals approximately 130,500 acres across nearly 23,700 tax lots, serving as the starting point for the analysis. While these lots represent just 13 percent of all tax lots in Clark County, they comprise a significant portion of the rural and agricultural unincorporated land base outside the UGA or incorporated city limits, accounting for 34 percent of the county's total acreage.

Within this broad study area are the lands currently In Agriculture designations and those not in Agriculture designations. The lands in agricultural designations (including Agriculture-20 (AG-20), Agriculture/Wildlife (AG/WL), and Airport (A)) total 2,625 lots and 32,589 acres. This represents just 11 percent of the total lots in the study area but accounts for 25 percent of the total acreage. The vast majority of this designated land, 30,420 acres (or 23% of the total study area), is zoned Agriculture-20 (AG-20).

Conversely, the lands not in Agriculture Designations make up the bulk of the study area, with 21,070 lots (89%) and 97,940 acres (75%). This area is predominantly zoned Rural-5 (R-5), which alone accounts for 75 percent of all lots and 55 percent of all acreage in the study area. This comparison shows a clear compositional difference between the two categories. The full study area is filtered in the next step to identify the "agricultural land base."

The table below in Exhibit 2 shows these values in more detail.

Exhibit 2. Study Area and Agricultural Land Designations by Parcels

Zoning by Plan Designation Type	# of Lots	% of Lots	# of Acres	% of Acres
In Agriculture Designations	2,625	11%	32,589	25%
Agriculture-20 (AG-20)	2,601	11%	30,422	23%
Agriculture/Wildlife (AG/WL)	22	0.1%	2,116	2%
Airport (A)	2	0.01%	50	0.04%
Not in Agriculture Designations	21,075	89%	97,941	75%
Rural-5 (R-5)	17,714	75%	71,914	55%
Rural-10 (R-10)	2,928	12%	22,198	17%
Rural-20 (R-20)	433	2%	3,829	3%
Total within Study Area	**23,700**	**100%**	**130,531**	**100%**

Note: The two parcels zoned as Airport (A) are split zoned between Agriculture and Airport designations.

Identify the Agricultural Land Base

This step refines the study area to define the agricultural land base through the application of the first two criteria in WAC 365-190-050(3)[10]: (a) The land is not already characterized

[10] *Washington Administrative Code* (WAC). § 365-190-050(3). https://app.leg.wa.gov/wac/default.aspx?cite=365-190-050

by urban growth; and (b) The land is used or capable of being used for agricultural production. The analysis first removes lands characterized by urban growth, then identifies among the remaining areas those currently in agricultural use or possessing agricultural capability. The analysis integrates crop and soil datasets, assessor records, and measures of both agricultural activity and urban development to delineate the lands that form the basis for evaluating long-term commercial significance.

Urban Growth Characteristics

Per WAC 365-190-050(3)(a) and WAC 365-196-310(3)(c)(vii),[11] the first factor for identifying agricultural resource lands is that the land is not characterized by urban growth. To evaluate this factor, the analysis examined several indicators of urbanization within the study area, including:

- **Urban Growth Area (UGA) boundaries.** Lands within existing UGA boundaries were considered characterized by urban growth and excluded from the agricultural land base.
- **Land cover from the 2024 National Land Cover Database (NLCD).**[12] The NLCD was used to identify areas classified as medium or high intensity development. High intensity development is defined as areas where people reside or work in high numbers and impervious surfaces account for 80 to 100 percent of the total cover. These areas typically correspond to multifamily, commercial, or industrial uses. Medium intensity development, commonly associated with single-family residential development, is defined as areas with a mixture of constructed materials and vegetation, where impervious surfaces account for 50 to 79 percent of the total cover.
- **Parcel size.** Parcel size was analyzed across the study area to identify locations where smaller parcels indicated more intensive development or subdivision patterns.
- **Residential density.** Existing dwelling unit density was mapped to evaluate where current development intensity may suggest urban characteristics.

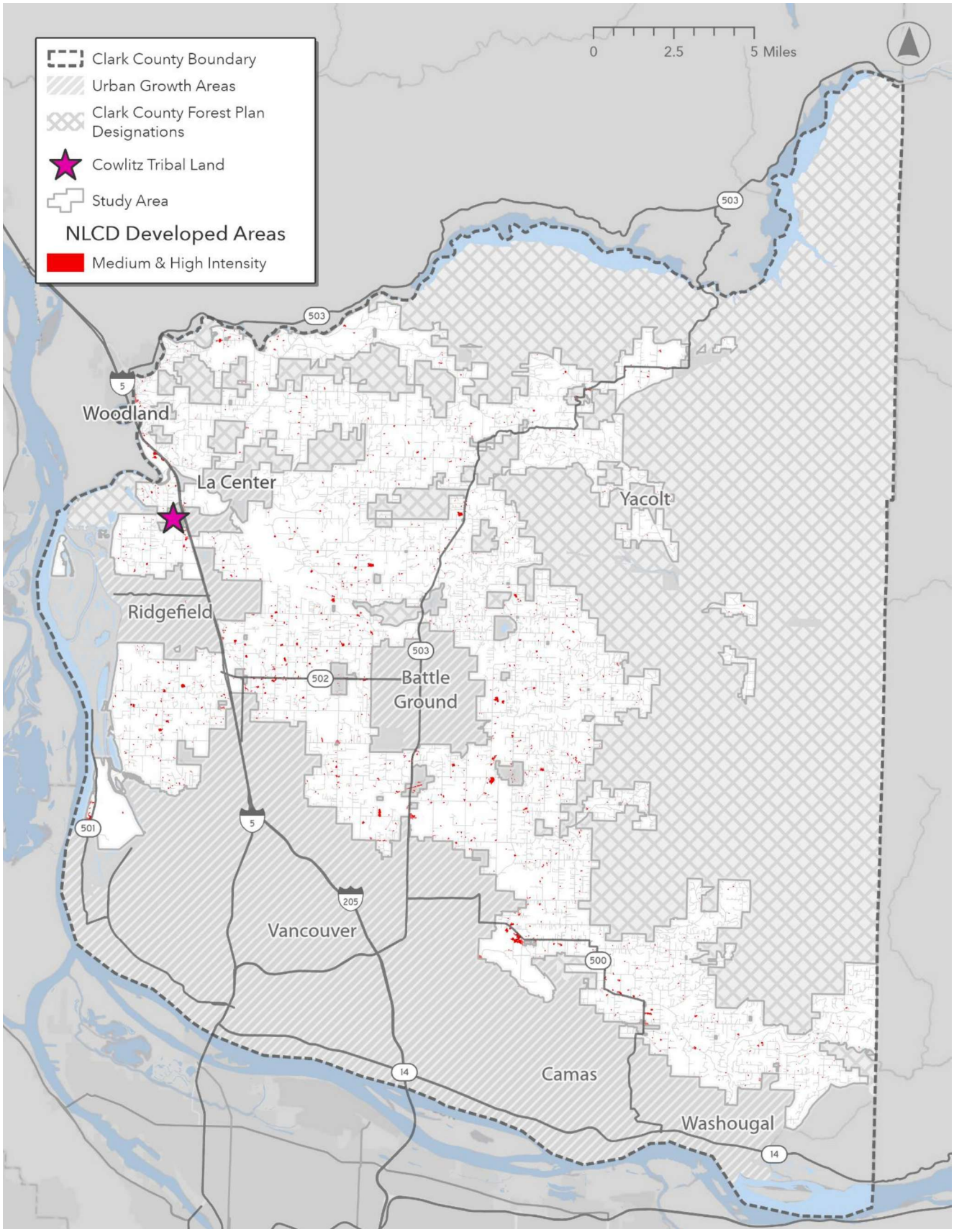
Existing adopted UGAs were automatically excluded from the analysis because they meet the standard of "characterized by urban growth." This includes both incorporated municipal lands and unincorporated lands within adopted and approved UGA boundaries. These areas outside of County plan designation jurisdiction and as a result, they do not meet the statutory definition of agricultural resource lands and were removed from further evaluation in this study. These UGAs can be seen below in Exhibit 3, as well as all subsequent maps in this report.

[11] *Washington Administrative Code* (WAC). § 365-190-040(10)(c). https://app.leg.wa.gov/wac/default.aspx?cite=365-190-040

[12] U.S. Geological Survey (USGS). 2024. Annual NLCD Collection 1 Science Products (ver. 1.1, June 2025) https://doi.org/10.5066/P94UXNTS. Accessed August 2025.

The NLCD was evaluated as an additional indicator of urban development by mapping the distribution of high and medium intensity development located outside existing UGA boundaries. These areas can be seen in Exhibit 3. The mapping results showed no substantial, widespread concentrations of development in rural areas, indicating that most development intensity remains contained within UGAs.

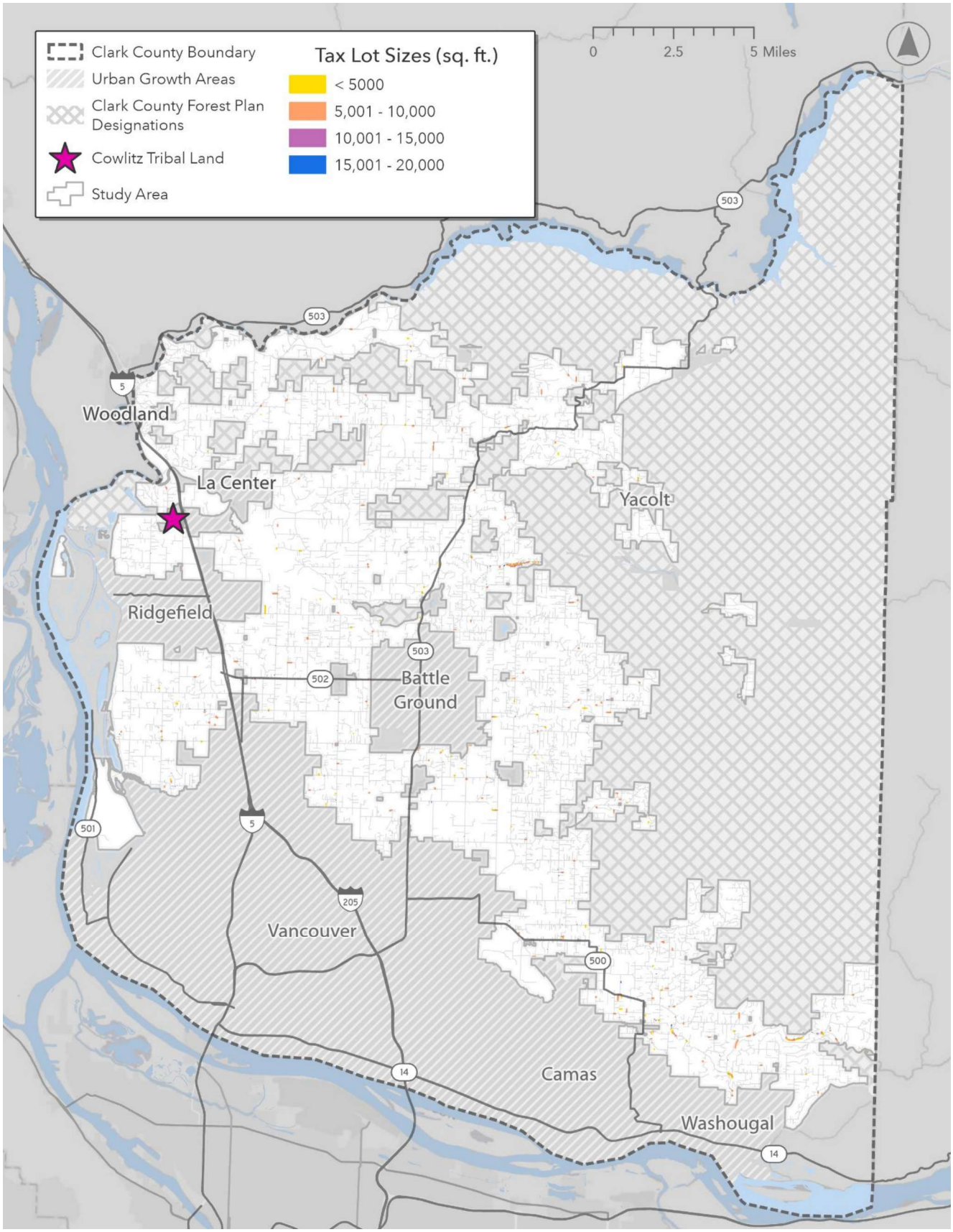
Exhibit 3. National Land Cover Database - Medium and High Intensity Development



Source: NLCD (2024), Clark County (2025)

Parcel size was examined as an indicator of potential urban development pressure. Smaller residential lots can indicate subdivision activity and the spread of urban development into rural areas. To evaluate this, parcels were grouped into three size ranges indicative of single-family housing: 5,000 square feet or less, 5,000 to 10,000 square feet, 10,000 to 15,000 square feet, and 15,000 to 20,000. The mapped results, shown in Exhibit 4, showed virtually no distinguishable parcel clusters. Overall, parcel size patterns did not indicate notable urbanization beyond designated growth areas.

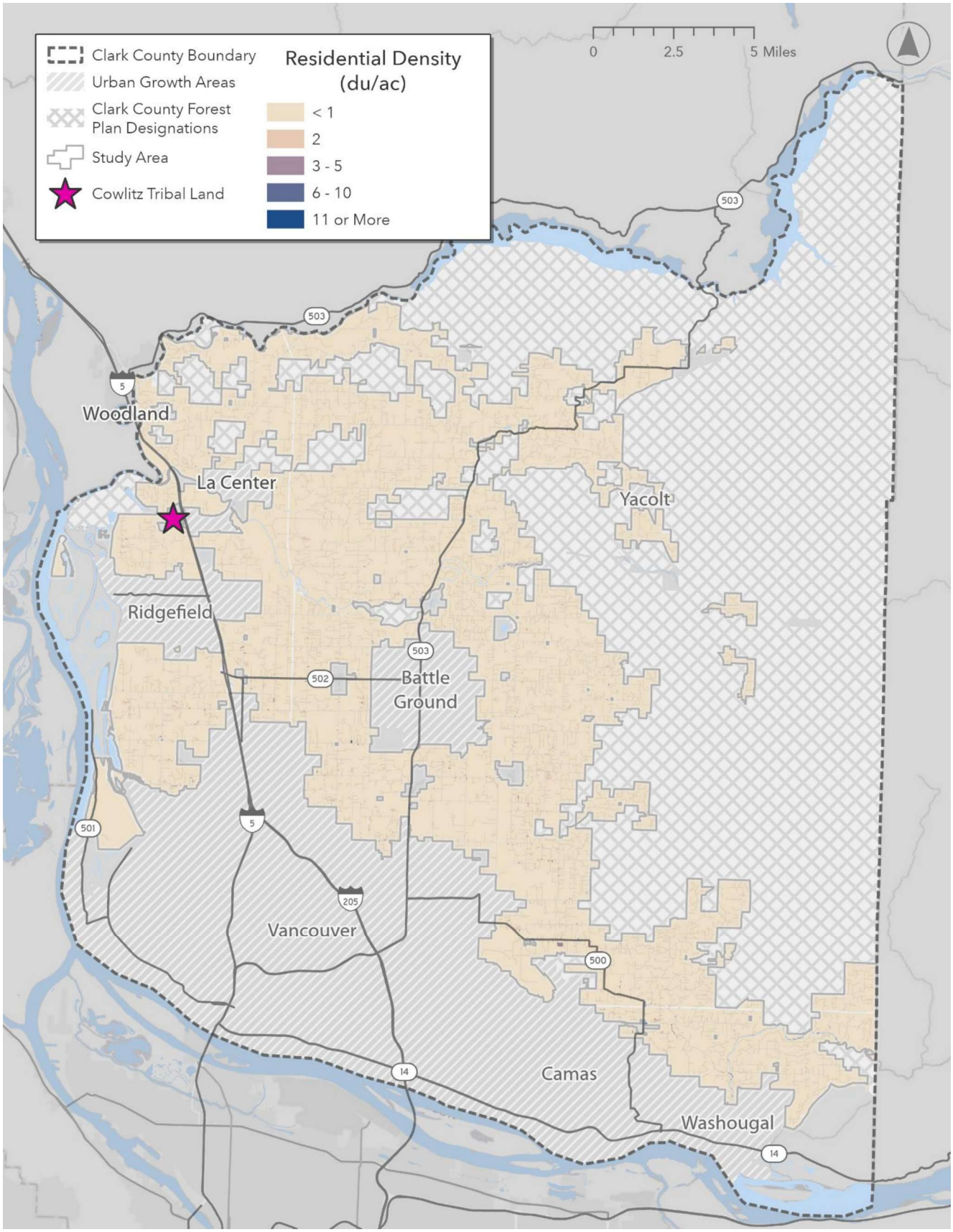
Exhibit 4. Tax Lot Size as Indicator of Urban Growth



Source: Clark County (2025)

Residential density was assessed as part of the evaluation of urban growth characteristics to identify where housing development may extend beyond adopted Urban Growth Area boundaries. Using dwelling units per acre (du/ac) as the measure, the analysis found that residential densities of one unit per acre or less were exhibited throughout the area, even on most UGA boundaries. The overall pattern indicates that urban-level densities remain contained within UGAs and do not extend meaningfully into surrounding rural areas. Exhibit 5 shows the level of residential density throughout the study area.

Exhibit 5. Residential Density as Indicator of Urban Growth



Source: Clark County (2025)

Because none of the additional indicators (NLCD land cover, parcel size, or residential density) showed any meaningful patterns of urban development beyond existing Urban Growth Areas (UGAs), **this step of the analysis concluded that UGA boundaries provide the most reliable and defensible representation of land characterized by urban growth and removal of lands showing "characteristics of urban growth" is not justifiable.** This finding is consistent with state guidance and reflects the County's own planning framework. Accordingly, the remainder of the analysis relied on UGA boundaries as the basis for excluding lands characterized by urban growth from the agricultural land base.

Agricultural Production Capabilities

With lands characterized by urban growth removed from the study area, the next step in the analysis is to identify the agricultural "land base." This process is guided by WAC 365-190-050(3)(b),[13] which requires the evaluation to include all lands that are either currently *used* for agriculture or are *capable* of being used for agricultural production. To fulfill this requirement comprehensively, the analysis began with the single dataset mandated by state law and expanded its scope to explore other sources in response to valuable stakeholder feedback.

The Washington Administrative Code (WAC) provides a specific starting point for this analysis. WAC 365-190-050(3)(b)(ii) mandates that counties "shall use the land-capability classification system of the United States Department of Agriculture (USDA) Natural Resources Conservation Service." While this land-capability classification (LCC) system served as the foundation of the analysis, feedback gathered during public engagement revealed concerns that relying solely on this dataset would be insufficient. Landowners and agricultural producers from open house events and meetings with the Clark County Agricultural Advisory Commission noted that the LCC system, due to its specific metrics, could classify some currently active and productive farms as "not fit for farm use." This indicated that a more holistic approach was necessary to accurately identify the county's full agricultural land base.

In response, the analysis was broadened to explore supplemental datasets covering both soil characteristics and existing crop coverage. This multi-layered investigation was designed to provide a more nuanced understanding of agricultural capability and current use than any single source could provide. Furthermore, stakeholders expressed concern that a focus on soils and crops could inadvertently exclude livestock operations. Site-specific GIS data on livestock farms is limited; therefore, to appropriately account for this industry, the analysis explored Clark County Assessor records to determine if parcels with a present use code indicating livestock or other agricultural activities could serve as a reliable proxy.

Based on this exploratory approach, the analysis considered three distinct categories of datasets:

[13] *Washington Administrative Code* (WAC). § 365-190-050(3)(b). https://app.leg.wa.gov/wac/default.aspx?cite=365-190-050

1. **Soil Capability:**[14]
    - Land Capability Classification (LCC) system.
    - Farmland Classification (Prime, Statewide Importance, etc.)
    - The USDA National Commodity Crop Productivity Index (NCCPI).
2. **Crop Coverage:**
    - The USDA National Agricultural Statistics Service (NASS) Cropland Data Layer (CDL).[15]
    - The Washington State Department of Agriculture (WSDA) Agricultural Land Use layer.[16]
3. **Clark County Assessor Records:**
    - Parcels with a present use code indicating livestock or other agricultural activities.

The final determination of which of these data sets would be used to define the agricultural land base was a multistep process. An iterative process was conducted of comparing data layers, incorporating stakeholder input, and coordinating with County staff which allowed the analysis to refine and confirm the datasets most appropriate for defining the agricultural land base used in the subsequent evaluation of long-term commercial significance. The following sections discuss this process in more detail.

SOIL CAPABILITY

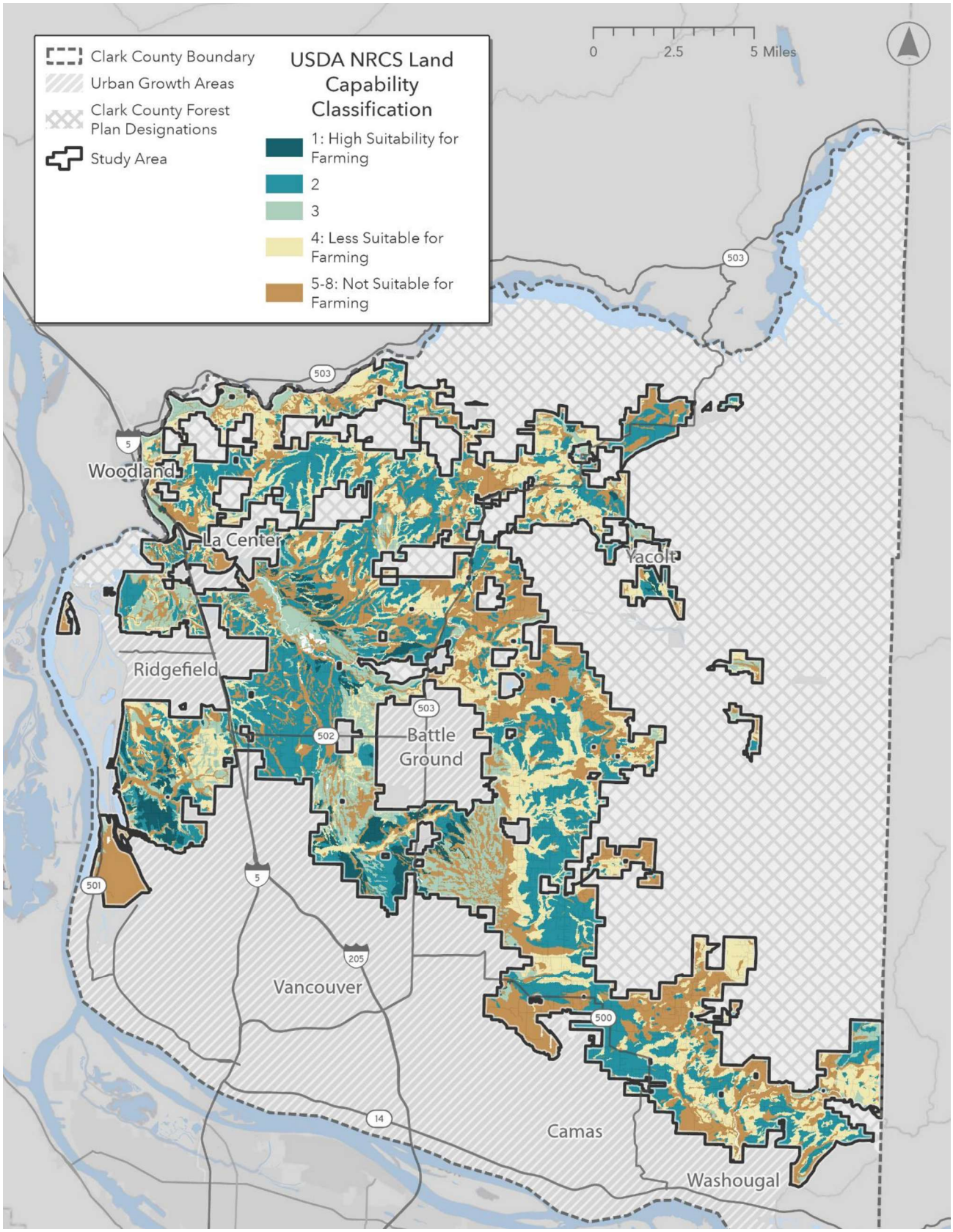
To assess the agricultural capability of soils within the study area, the analysis explored three different interpretive products from the USDA NRCS Soil Survey Geographic (SSURGO) database. These datasets were reviewed to determine how to best measure the physical capacity of land to support agriculture, a key component of the WAC 365-190-050(3)(b)[17] criterion. Each data set provides a unique lens through which to evaluate soil quality.

The **Land Capability Classification (LCC)** system was the foundational dataset for this analysis, as its use is required by the WAC 365-190-050(3)(b)(ii). The LCC system is a risk assessment tool that groups soils into eight classes based on their limitations for growing common agricultural crops and the risk of soil damage if they are farmed. The classes range from I (highly suitable to farming) to VIII (unsuitable for cultivation), with classes I through IV considered “fit to farm”. This system is primarily a measure of risk and limitations; it

[14] Soil Survey Staff, NRCS, USDA. SSURGO Database for Clark County, WA (Ver. 22, Aug. 26, 2024). Retrieved from Web Soil Survey, Accessed August, 2025. https://websoilsurvey.nrcs.usda.gov/
[15] USDA National Agricultural Statistics Service (NASS). 2024 Cropland Data Layer (CDL). Retrieved from the CropScape portal, https://nassgeodata.gmu.edu/CropScape/. Accessed August 2025.
[16] Washington State Dept. of Agriculture (WSDA). "Agricultural Land Use GIS Data" (Last Survey Date 7/31/2021–7/17/2024). Retrieved from https://agr.wa.gov/departments/land-and-water/natural-resources/agricultural-land-use. Accessed August, 2025.
[17] *Washington Administrative Code* (WAC). § 365-190-050(3)(b). https://app.leg.wa.gov/wac/default.aspx?cite=365-190-050

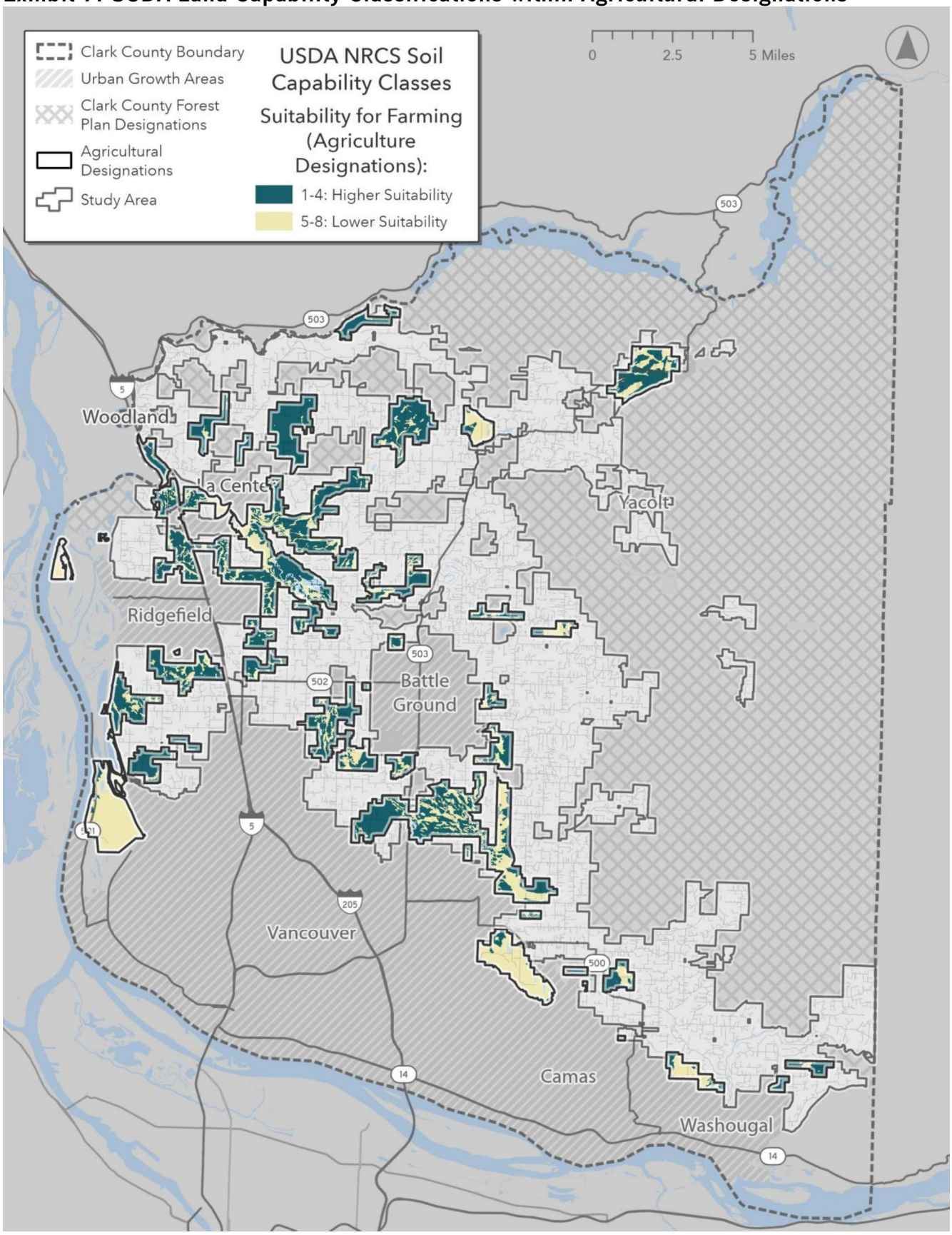
evaluates soils based on their potential for erosion, drainage problems, and other hazards that could impact long-term agricultural use. Its purpose is to guide land management rather than to predict crop yield. The NRCS classifications in the study area are shown in Exhibit 6 and a broader, binary fit-to-farm vs. not fit-to-farm look at LCC data with focus on land in the agriculture designations is provided in Exhibit 7.

Exhibit 6. USDA Land Capability Classifications



Source: USDA NRCS SSURGO (2024), Clark County (2025).

Exhibit 7. USDA Land Capability Classifications within Agricultural Designations



Source: USDA NRCS SSURGO (2024), Clark County (2025)

Within the study area, there are 18,000 parcels that are deemed suitable for farming, meaning that at least 50 percent of their footprint contains class 1-4 soils. Throughout the study area more broadly, suitable soils cover 89,700 acres or 69 percent of the study area. 5,670 parcels are deemed not suitable for farming. Among the parcels that suitable, class 2 soils are the most prominent covering 39,740 acres or 30 percent of the total fit-to-farm parcel area. Class 4 soils are the next most prominent type among the suitable parcels covering 32,400 acres or 23 percent of the area. Additionally, there are 4,720 acres of class 1 soil covering about 4 percent of the total suitable parcel area, and 12,840 acres of class 3 soil which covers 12 percent of the area. Exhibit 8 shows these figures in more detail.

Exhibit 8. Soil Capability Classes Across Study Area

Soil Capability Classification	# of Lots	% of Lots	# of Acres	% of Acres
Suitable for Farming	**18,023**	**76%**	**89,700**	**69%**
Class I	1,105	5%	4,718	4%
Class II	8,517	36%	39,745	30%
Class III	2,477	10%	12,835	10%
Class IV	5,924	25%	32,402	25%
Not Suitable for Farming	**5,677**	**24%**	**40,831**	**31%**
Total within Study Area	**23,700**	**100%**	**130,531**	**100%**

Note: Parcels or lots are assigned soil classification if they are covered 50% or more by the combined fit to farm area, then assigned class type based on the primary soil class covering the parcel.

Conversely, within the agricultural land designations, almost 2,050 out of 2,625 (78 percent) parcels are suitable for farming. These parcels cover 20,500 acres or 63 percent of the agricultural land designation area. There are about 580 parcels that are not deemed suitable. Among the agriculturally designated lands, class 2 soils are still the predominant classification covering 29 percent of the area or 9,590 acres, followed by class 3 soils which cover 13 percent of the area or 4,630 acres. Additionally, class 4 soils cover 13 percent (4,330) acres, while class 1 soils cover 9 percent of the area or 1,890 acres. These figures can be seen in more detail in Exhibit 9.

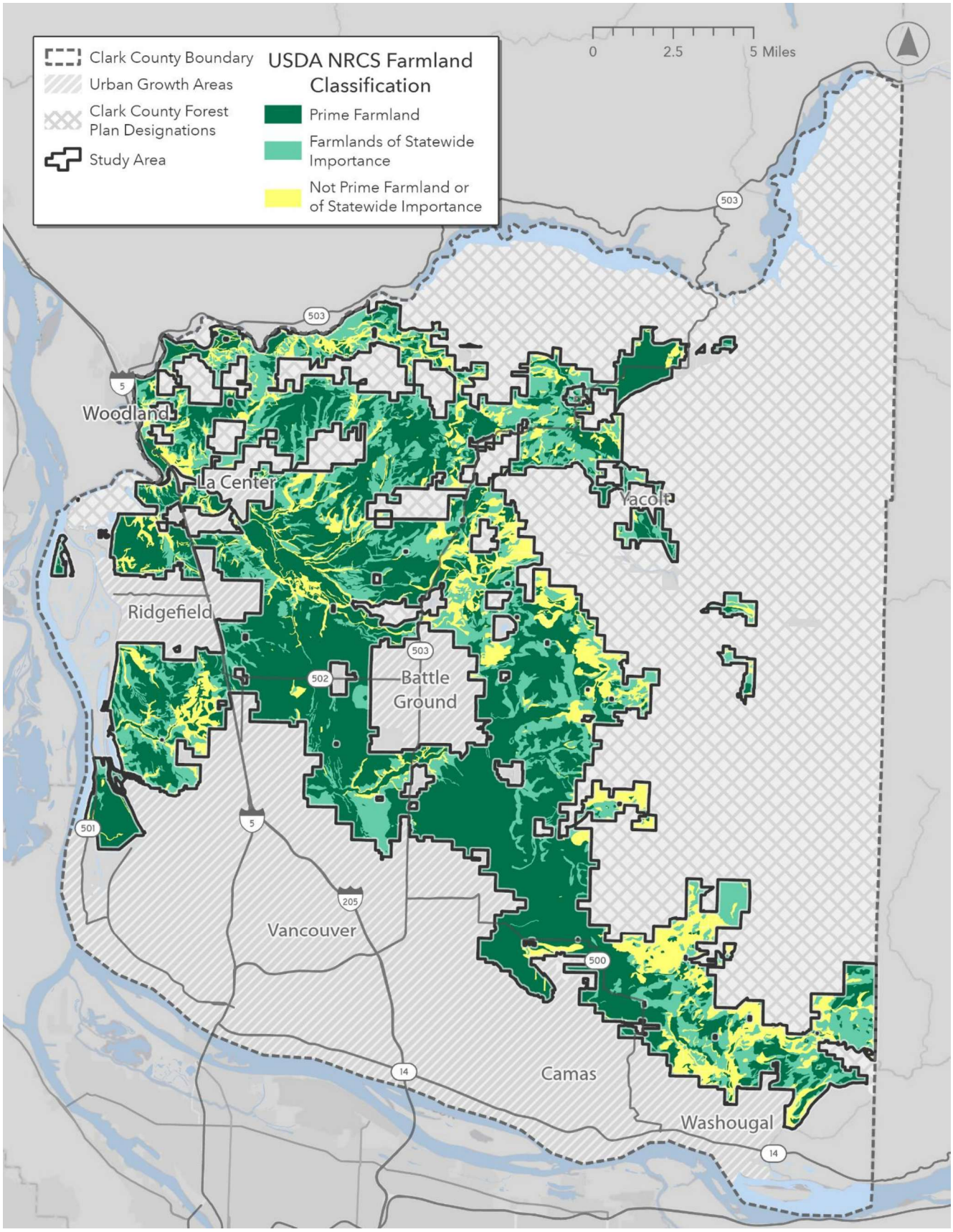
Exhibit 9. Soil Capability Classes Across Agriculturally Designated Lands

Soil Capability Classification	# of Lots	% of Lots	# of Acres	% of Acres
Suitable for Farming	**2,047**	**78%**	**20,542**	**63%**
Class I	253	10%	1,997	6%
Class II	1,090	42%	9,589	29%
Class III	381	15%	4,630	14%
Class IV	323	12%	4,327	13%
Not Suitable for Farming	**578**	**22%**	**12,047**	**37%**
Total with Agriculture Designations	**2,625**	**100%**	**32,589**	**100%**

Note: Parcels are assigned soil classification if they are covered 50% or more by the combined fit to farm area, then assigned class type based on the primary soil class covering the parcel.

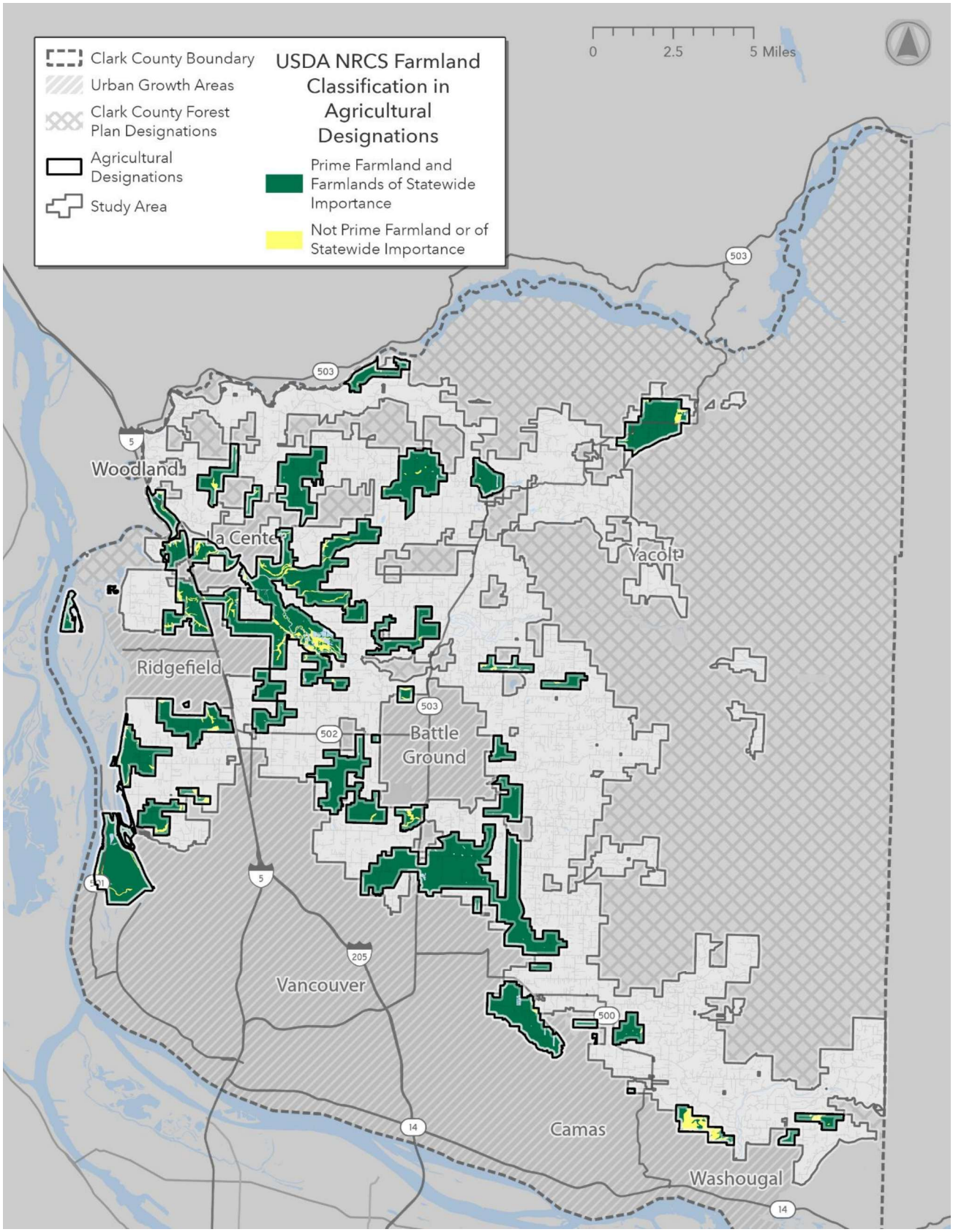
The **Farmland Classification system** provides a different perspective by identifying the most important agricultural soils based on their productive qualities. Instead of focusing on limitations, it classifies soils into categories such as “Prime Farmland,” “Farmland of Statewide Importance,” and "Unique Farmland." Prime Farmland is land that is best suited for producing common crops, possessing an ideal combination of soil properties. Unlike the LCC, which is focused on what might go wrong (limitations), the Farmland Classification system is focused on what makes land good for farming (inherent quality), even if management is required to unlock that potential (e.g., "Prime if irrigated"). The study area’s farm classification groupings can be seen below in Exhibit 10 and Exhibit 11 again shows a binary classification of prime or statewide importance farm vs. not prime, with a focus on the agricultural land designations.

Exhibit 10. USDA Farmland Classification



Source: USDA NRCS SSURGO (2024), Clark County (2025).

Exhibit 11. USDA Farmland Classifications within Agricultural Designations



Source: USDA NRCS SSURGO (2024), Clark County (2025).
Note: Agricultural Designations are the existing lands designated by Clark County.

Within the study area and as seen in Exhibit 12, there are 19,660 parcels that are considered fit to farm meaning that at least 50 percent of their footprint is covered by prime soils or soils of statewide importance. These parcels cover 107,100 acres or 82 percent of the study area. There are 4,040 parcels that are not fit to farm based on this definition. Among the study area, there are 48,140 acres of prime soils that do not require any additional management to achieve prime status (this soil classification is called "All prime soils"), which cover 42 percent of the fit-to-farm parcel area. This is the predominant soil type within the study area. There are 35,570 acres of soils of statewide importance which cover 27 percent of the fit-to-farm parcel area. Soils that would be considered prime if other management activities were enacted (drainage, irrigation, or protection from flooding) cover 24,000 acres or 18 percent of the fit-to-farm area. Exhibit 13 shows these figures in detail.

Exhibit 12. Farm Classes Across Study Area

Farm Class Type	# of Lots	% of Lots	# of Acres	% of Acres
Prime Farms or Farms of Statewide Importance	19,664	83%	107,107	82%
Not of Prime or Statewide Importance	4,036	17%	23,424	18%
Total within Study Area	**23,700**	**100%**	**130,531**	**100%**

Note: Parcels are assigned farm classification where 50% of their acreage are covered by combined areas of Prime Farmland and Farmland of Statewide Significance.

Exhibit 13. Farm Subclasses Across Study Area

Farmland Subclasses	Acres	% of Study Area
Prime All	48,143	37%
Prime if (Drained, Irrigated, or Protected from Flooding)	23,396	18%
Statewide Importance	35,569	27%
Not of Prime or Statewide Importance	23,424	18%
Total	**130,531**	**100%**

Note: Subclasses are assigned to parcels where their site is 50% covered or more by the higher farm class type. Then the subclass is assigned with the highest proportion of the area.

Within the agricultural land designations and as seen in Exhibit 14, there are 2,520 or 96 percent of the parcels are deemed fit to farm. These parcels cover 29,886 acres or 92 percent of the agricultural land designation area. There are 106 parcels within the agricultural land designation that are not considered fit to farm. Among the fit-to-farm parcels in the agricultural land designations, prime soils that do not require any additional management to achieve the prime status remain the predominant soil class, covering 45 percent of the fit-to-farm parcels (14,760 acres). This is followed by soils that are prime if

drained which cover 31 percent of the fit-to-farm parcel area (10,060 acres) and soils of statewide importance which cover 17 percent of the fit-to-farm parcel area (5,460 acres). Exhibit 15 shows more information about these subclasses.

Exhibit 14. Farm Classes Across Lands within Agricultural Designations

Farm Class Type	# of Lots	% of Lots	# of Acres	% of Acres
Prime Farms or Farms of Statewide Importance	2,519	96%	29,886	92%
Not of Prime or Statewide Importance	106	4%	2,703	8%
Total within Agricultural Designations	**2,625**	**100%**	**32,589**	**100%**

Note: Parcels are assigned farm classification where 50% of their acreage are covered by combined areas of Prime Farmland and Farmland of Statewide Significance

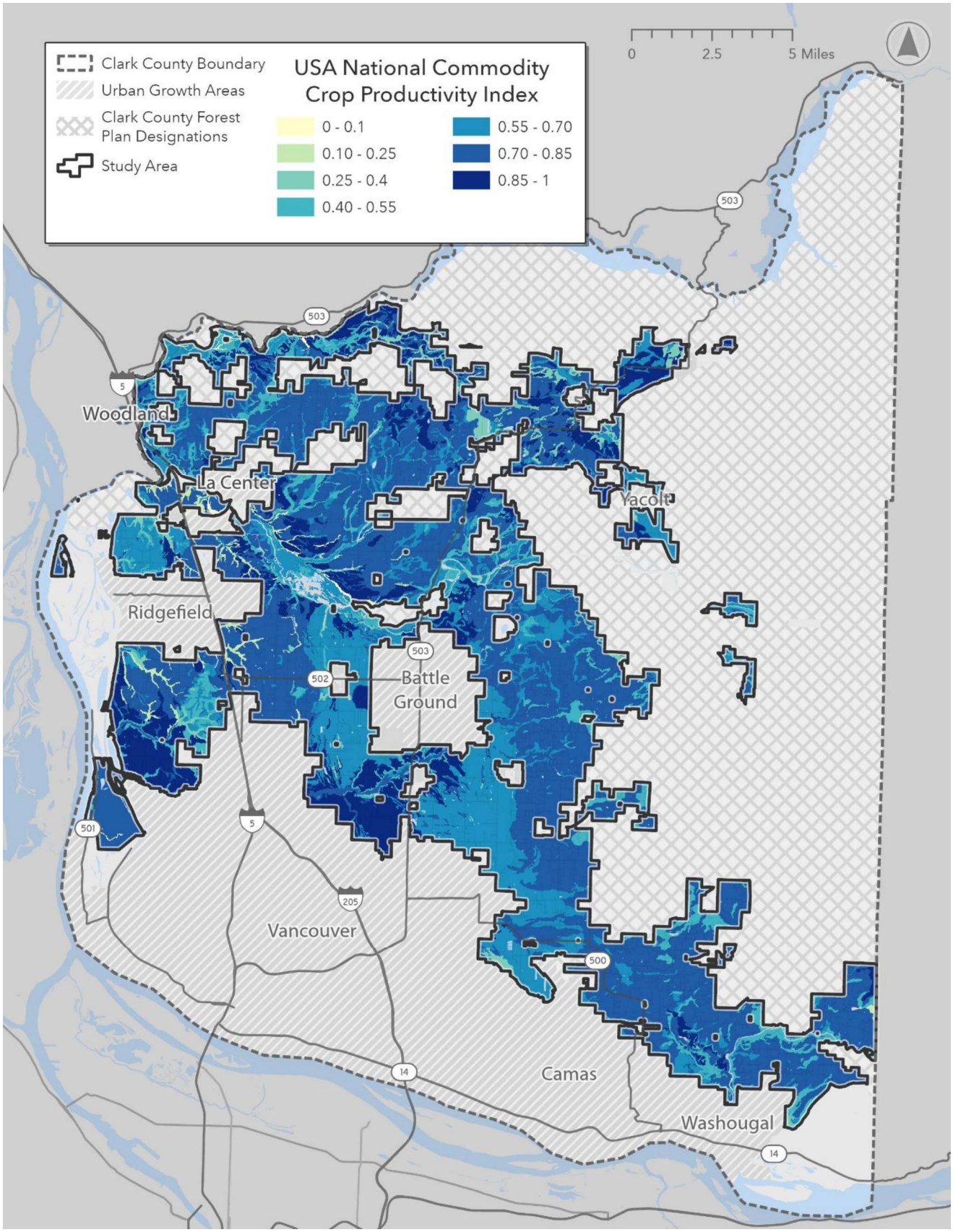
Exhibit 15. Farm Subclasses Across Lands within Agricultural Designations

Farmland Subclasses	Acres	% of Agricultural Designations
Prime All	14,757	45%
Prime if (Drained, Irrigated, or Protected from Flooding)	10,059	31%
Statewide Importance	5,463	17%
Not of Prime or Statewide Importance	2,309	7%
Total	**32,589**	**100%**

Note: Subclasses are assigned to parcels where their site is 50% covered or more by the higher farm class type. Then the subclass is assigned with the highest proportion of the area.

Finally, the analysis considered the **National Commodity Crop Productivity Index (NCCPI)**. This is a model-based rating system that provides a numerical score from 0 to 1, representing a soil's inherent potential to produce major commodity crops. The NCCPI is designed as a consistent national measure of productivity that is independent of management practices. It differs from both the LCC and Farmland Classification by providing a precise quantitative score rather than a categorical grouping. While the LCC assesses risk and Farmland Classification identifies top-tier land, the NCCPI offers a direct, data-driven index of natural productive capacity. This dataset can be seen for the study area in Exhibit 16.

Exhibit 16. USDA National Commodity Crop Productivity Index



Source: USDA NRCS (2025), Clark County (2025)

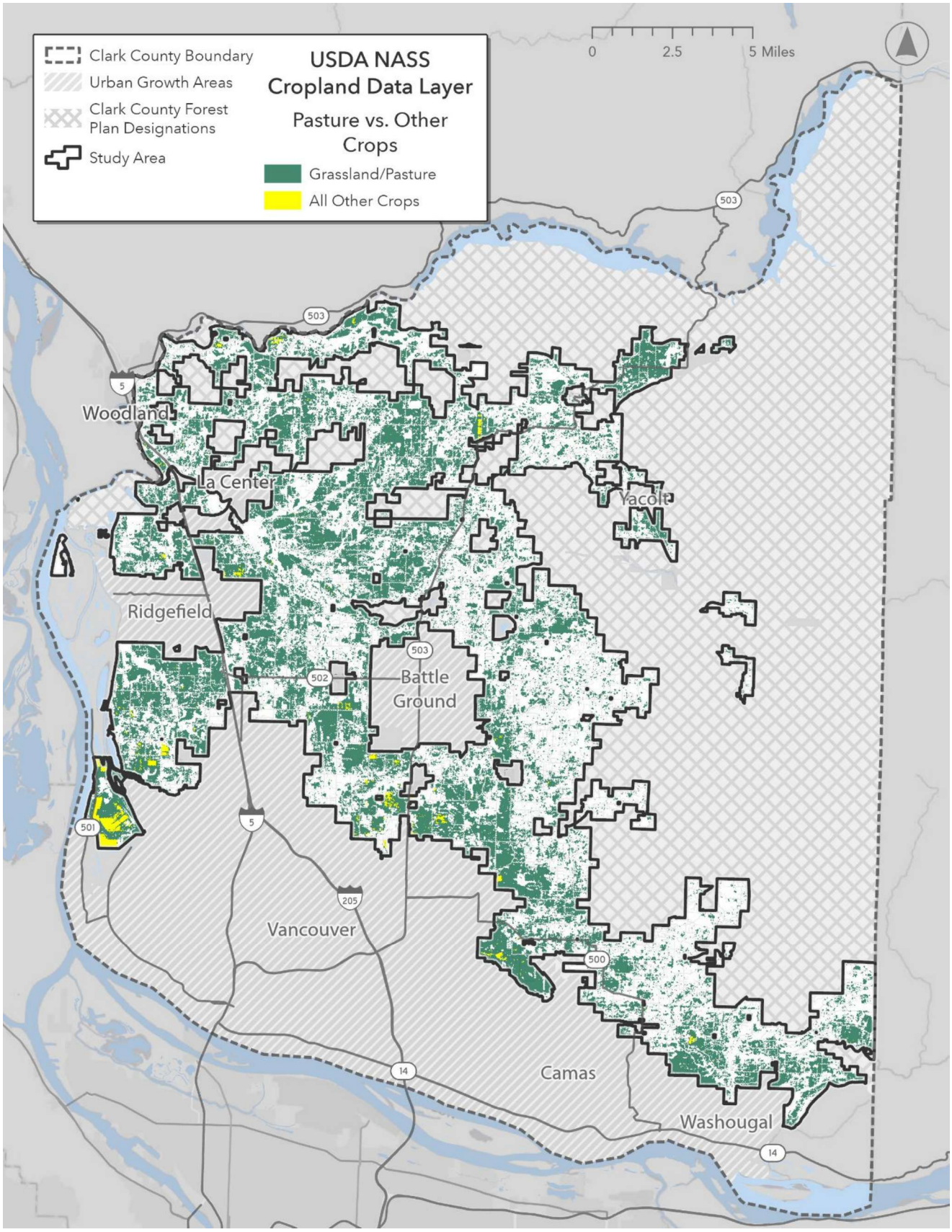
CROP COVERAGE

In addition to evaluating the inherent capability of soils, the analysis explored datasets that directly identify lands that satisfy the requirement of "currently used for agricultural production and lands that are capable of such use" component of WAC 365-190-050(3)(b)(i).[18] By using crop data, it can provide a direct measure of where farming is actively occurring on the landscape. To capture the most accurate and comprehensive picture of current agricultural activity, the study reviewed two different geospatial crop coverage datasets, one from a federal source and one from a Washington state source.

The first dataset reviewed was the **USDA National Agricultural Statistics Service (NASS) Cropland Data Layer (CDL)**. The CDL is a comprehensive, raster-based (pixel) dataset derived from satellite imagery that is produced annually for the entire United States. It identifies and classifies a wide variety of specific crop types, such as corn and wheat, as well as broader land cover categories like pasture and grassland. The primary value of the CDL is its consistency and broad scope, offering a yearly snapshot of agricultural patterns across the country. However, its 30-meter (approximately 100 feet) pixel resolution means it is better suited for identifying broad patterns of cultivation rather than precisely delineating the boundaries of small or irregularly shaped fields. The CDL can be seen for this analysis' study area in Exhibit 17 below.

[18] *Washington Administrative Code* (WAC). § 365-190-050(3)(b)(i). https://app.leg.wa.gov/wac/default.aspx?cite=365-190-050

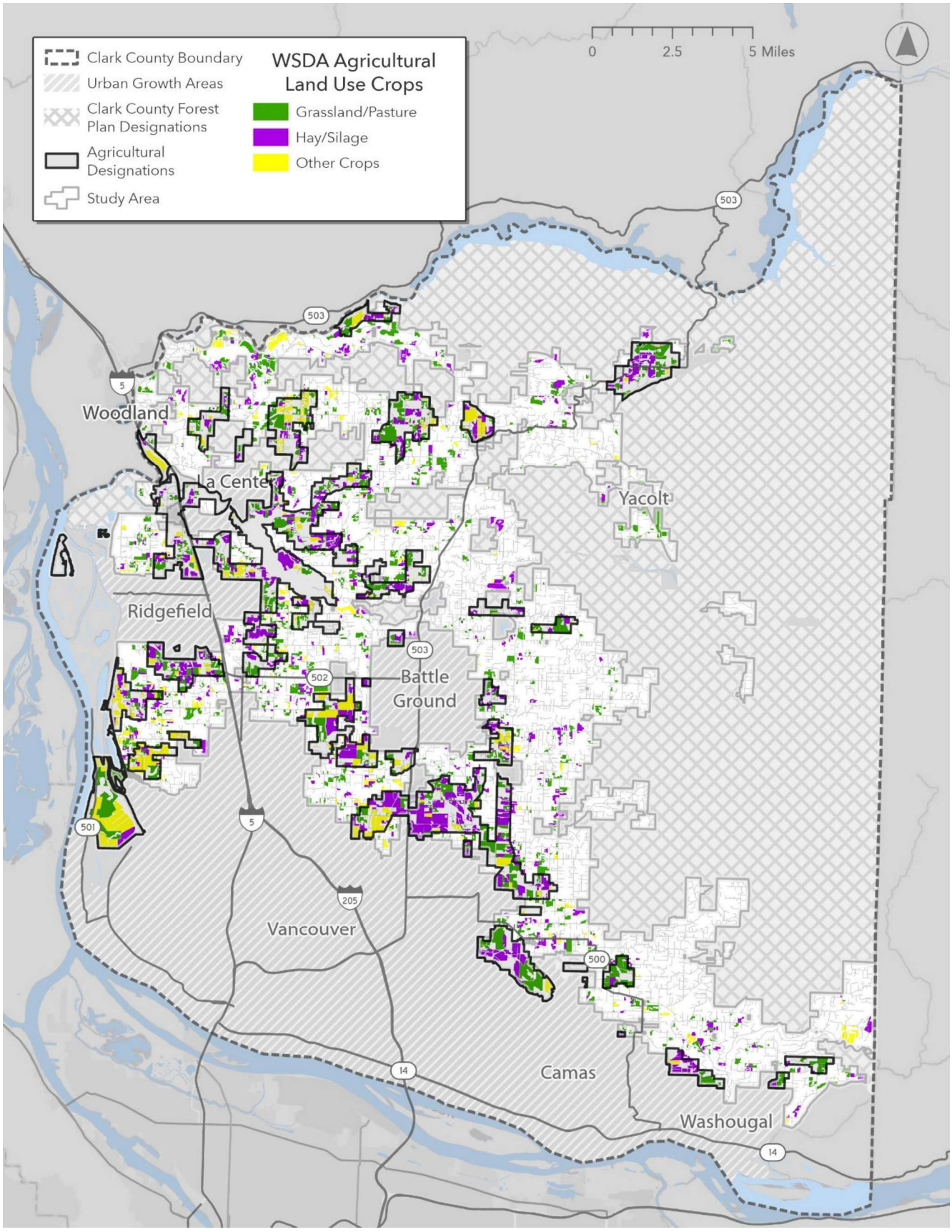
Exhibit 17. USDA NASS Cropland Data Layer



Source: USDA NASS (2025), Clark County (2025)

The second dataset explored was the **Washington State Department of Agriculture (WSDA) Agricultural Land Use layer**. Unlike the CDL, the WSDA layer is a vector-based (polygon) dataset specific to Washington State. It is designed to map the actual boundaries of agricultural fields and identify the crops grown within them. Due to its use of polygons instead of pixels, it can offer a much more precise depiction of cultivation at the individual parcel level. Its methodology often combines remote sensing with other sources, such as farmer surveys and field verification, which can make it more accurate for identifying the specialty crops common in Washington. It provides a valuable, field-specific counterpoint to the broader, pixel-based CDL and can be seen for the study area below in Exhibit 18.

Exhibit 18. WSDA Agricultural Land User Layer



Source: WSDA, Clark County (2025)

Within the study area, there are 26,000 acres of cropland identified by the WSDA Agricultural Land Use Layer, accounting for 20 percent of the study area acreage. There are 2,173 parcels (9 percent of all study area parcels) with at least 50 percent of their footprint in agricultural production according to the WSDA data. These parcels contain 21,442 acres of cropland which amounts to 16 percent of the study area. There are 4,896 parcels with at least some (greater than zero) of their footprint in agricultural production. Of the 2,173 parcels with at least 50 percent of their area in agricultural production, 949 (44 percent) are designated agricultural lands and contain 14,321 acres of cropland accounting for 44 percent of the total area of the designated agricultural lands. These 949 parcels account for 36 percent of all parcels in the agricultural land designations and cover 18,828 acres or 58 percent of the total area of the designated agricultural lands. These parcels also have a higher than average parcel size at 20 acres (median 13) compared to an average parcel size of 8 acres (median 5 acres) for parcels in the agricultural land designation that do not have a majority of their area in cropland.

CLARK COUNTY ASSESSOR RECORDS

A key consideration in developing a comprehensive agricultural land base is accounting for agricultural activities not easily identified through soil and crop data, particularly livestock farms. This issue was raised by stakeholders during public engagement, who noted that a focus on cultivation could inadvertently exclude a significant part of the county's agricultural sector. However, comprehensive, site-specific GIS data for livestock operations is not available. To address this data gap, the analysis made a best effort to identify these farms by using Clark County Assessor records as a proxy.

This approach involved querying the Assessor's parcel data to identify tax lots with "present use" codes that indicate agricultural activity. The query specifically targeted codes for buildings used to house large animals. Because this method was being employed, the query was also expanded to include use codes for general agricultural buildings and structures used for farm equipment, thereby capturing a wider range of farming activities. This method, while admittedly limited, represents the most thorough attempt possible with available data to identify livestock and other non-crop farming operations.

Within the study area there are 94 parcels covering 947 acres that have present use codes with descriptions indicating agricultural activity. The majority of these parcels (70 total) have agricultural buildings present, 21 parcels have farm buildings for equipment, and 3 have farm buildings for large animals. However, only 13 lots are within the agricultural land designations.

Methodology to Define the Agricultural Land Base

The final determination of the agricultural land base was a holistic process that involved selecting the most appropriate dataset from each of the three categories explored: soil capability, crop coverage, and assessor records. The decision for each category was influenced by state mandates, data limitations, and direct feedback from stakeholders and County staff.

For the soil capability analysis, the Land Capability Classification (LCC) system was selected as the foundational layer, as its use is mandated by WAC 365-190-050(3)(b)(ii).[19] While the National Commodity Crop Productivity Index (NCCPI) was reviewed and appreciated for its advanced modeling, it was ultimately excluded from the final land base determination. Its methodology is somewhat obscured, making it difficult for stakeholders to conceptualize, and the final combination of other selected layers was deemed sufficient to account for any gaps its exclusion might create. Similarly, the Farmland Classification dataset was set aside at this stage. Because "Prime Farmland" is a specific factor for evaluating long-term *commercial significance* later in the analysis, its inclusion here would be premature and duplicative.

A key concern with relying solely on the LCC was that some areas classified as "not fit to farm" are, in fact, being actively and productively farmed. This potential discrepancy was resolved by the selection of a crop coverage dataset. During public engagement events, stakeholders expressed a clear preference for the Washington State Department of Agriculture (WSDA) Agricultural Land Use layer over the USDA Cropland Data Layer (CDL). The CDL's depiction of pasture was viewed as unrealistically broad, whereas the WSDA data was better received and considered more accurate. When the WSDA layer was overlaid with the LCC, it confirmed that many of the known, active farms located on soils with lower capability classifications were successfully captured. Therefore, the WSDA dataset was chosen to represent currently used agricultural land.

Finally, to address stakeholder concerns about representing the entire agricultural community, particularly livestock operations, the analysis considered incorporating the Clark County Assessor data, primarily to identify livestock operations in a best effort possible to create a complete and representative inventory. This attempt was born out of a commitment to honor the feedback received during public engagement and strive for an accurate and inclusive reflection of the agricultural community as a whole. However, due to WAC 365-190-040(10)(c)'s[20] language that lands studies "should not review natural resource lands designations solely on a parcel-by-parcel basis", a decision was made to exclude using the Assessor present use code to identify such farms and include in the agricultural land base, in order to ensure adherence to this rule. However, while these lots were not included, the effect they would have had in expanding the land base would have been minimal, as only three parcels outside of the land base were identified as containing livestock outside of the land base.

To establish the geographic boundaries of the agricultural land base, the analysis began by creating a single, comprehensive data layer representing both current use and land capability. The two selected spatial datasets, the WSDA Agricultural Land Use layer and classes I through IV of the USDA Land Capability Classification (LCC) system, were merged together to form this unified footprint. Following this, the merged spatial data is overlaid

[19] Washington Administrative Code (WAC). § 365-190-050(3)(b)(ii). https://app.leg.wa.gov/wac/default.aspx?cite=365-190-050

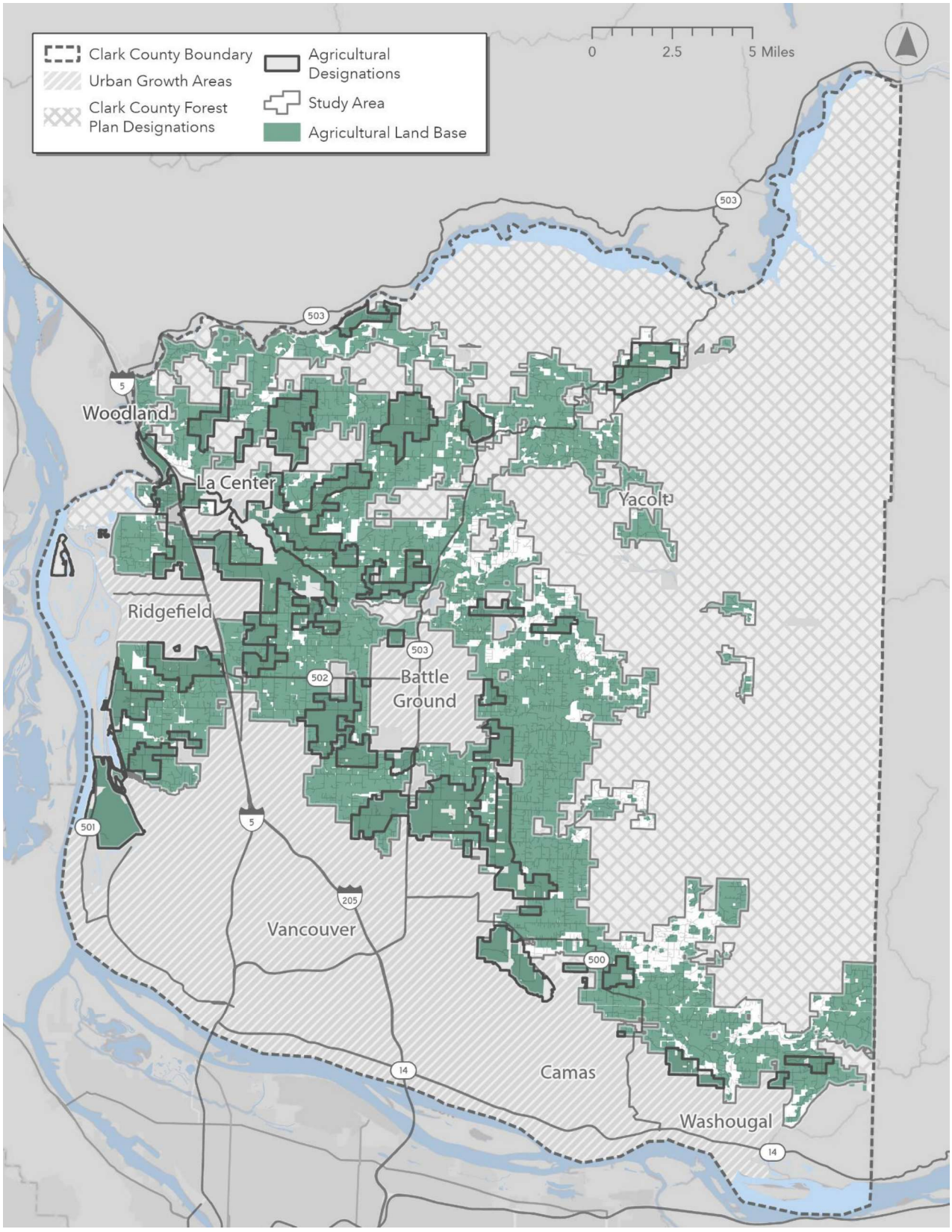
[20] Washington Administrative Code (WAC). § 365-190-040(10)(c). https://app.leg.wa.gov/wac/default.aspx?cite=365-190-040

with the Clark County tax lot data to identify qualifying parcels. Any parcels with at least 50 percent of their footprint overlapping with this combined agricultural data are considered to meet the criteria of "lands that are capable of being used for agricultural production" or "lands that are currently used for agricultural production." The 50 percent threshold ensures that a parcel is predominantly characterized by agricultural use or capability, and this group of selected parcels constitutes the final, defined agricultural land base for the study. This same process of intersecting and determining land coverage was then applied to the two individual layers from the WSDA and USDA to enable the ability to perform analysis on each individual layer. This methodological approach of intersecting spatial layers with tax lots to determine eligibility is used consistently throughout the rest of this analysis for evaluating indicators of long-term commercial significance.

The final agricultural land base, seen in Exhibit 19, comprises a total of 18,420 parcels, for a total tax lot area of 101,844 acres[21]. The mean parcel size in the agricultural land base is 5.5 acres while the median parcel size is 4.6 acres. 2,273 parcels covering 28,181 acres (12 percent of all parcels in the base and 28 percent of the base by area) are in agricultural designations.

[21] Note: Values pertaining to land area (acreage) include the total amount of a lot's land. The values given when discussing the agricultural land base do not consider developed areas or areas with constraints. Parcels that meet one of the two 50% thresholds to be included in the agricultural land base have the totality of their acreage included in sums.

Exhibit 19. Agricultural Land Base



Source: WSDA, USDA NRCS (2024), Clark County (2025)

Land capability classes 1-4 (those that are suitable to farm) make up a large share of the agricultural land base, covering about 83,600 acres or 83 percent of the land base. Soil classes 5 through 8 only cover 17,700 acres or 17 percent of the land base. Among the suitable-for-farming classes, Class 2 soils are the most prevalent covering about 37,600 acres or 37 percent of the land base followed by Class 4 soils, which cover over 29,800 acres (29 percent) of the land base. Class 3 soils cover over 11,600 acres (11 percent) and Class 1 soils cover about 4,500 acres (4 percent). There are also 542 acres with unidentified land capability class which accounts for 0.5 percent of the agricultural land base.

Within the agricultural land base, there are eleven different crop groups represented. The most predominant crop group is pasture, which covers just over 11,000 acres (11 percent) of the land base. The next most predominant crop group is hay/silage which covers almost 9,000 acres (9 percent). The third most prominent is the "other" crop group, which includes wildlife feed, fallowed lands, conservation reserve lands, and unknown crops. This category covers over 2,500 acres (2 percent) of the agricultural land base. Commercial tree production is the next most common group, covering about 790 acres (0.8 percent) of the land base, followed by berries, which cover about 570 acres or 0.6 percent of the land base. The other crop groups represented are nurseries, orchards, vegetables, vineyards, seed, cereal grains, herbs and turfgrass. Collectively, these crop groups cover about 1,040 acres (1 percent) of the agricultural land base

Looking at where crops are grown relative to soil capability classes, we find that the majority of all crops are grown on class 2 soils, followed by class 5-8 soils. There are 8,240 acres of crops grown on class 2 soils, which comprise 8 percent of the agricultural land base. There are 7,093 acres of crops grown on soils in classes 5 through 8, which comprise 7 percent of the agricultural land base. Additionally, 4,440 acres of crops are grown on class 4 soils, 3,440 acres of crops are grown on class 3 soils, and 1,670 acres of crops are grown on class 1 soils. Of the 542 acres of unidentified soils within the agricultural land base, crops are grown on 56 of those acres.

The Hay/Silage and Pasture crop groups are consistently the most predominant crop group across soil types. Hay/Silage is grown predominantly on class 2 soils (2,900 acres) followed by classes 5-8 (2,480 acres), and class 4 soils (1,625 acres). Pasture follows the same pattern with 3,975 acres grown on class 2 soils, followed by 3,160 acres grown on class 5-8 soils, and 2,110 acres grown on class 4 soils. The "other" crop group is the third most predominant crop group and is found across all soil classifications but is most commonly found on soils in classes 5-8 (about 1,200 acres). Though the rest of the crop groups grown in the agricultural land base are not as common as the Hay/Silage and Pasture groups, their occurrence varies across soil classifications. Commercial trees are grown primarily on class 2 (380 acres) and class 4 (230 acres) soils. Berries are most commonly found on Class 2 soils (213 acres), followed by Class 5-8 soils (160 acres), and Class 1 soils (113 acres). Nursery operations are primarily found on Class 3 soils (240 acres). Seed crops are found primarily on Class 1 and 2 soils (111 and 110 acres respectively), and vegetable crops are found primarily on Class 2 (70 acres) and class 1 (50 acres) soils. Orchards are found most commonly on class 3 (35 acres) and class 2 soils (34 acres). Vineyards are by far most

common on class 2 soils (48 acres), Cereal grains are primarily found on class 4 soils (23 acres) followed by class 1 and 2 soils (17 acres on each soil class). Finally, turfgrass is only found on class 3 soils (28 acres), and herbs are found mostly on class 1 soils (3 acres).

These values can be seen in more detail in Exhibit 20.

Exhibit 20. Crop Coverage by Soil Classification

Crop Type	Crop Acres	Class 1	Class 2	Class 3	Class 4	Class 5-8	Unknown Soil Type
Berry	565	113	213	24	55	160	0.4
Cereal Grain	68	17	17	6	23	4	0.2
Commercial Tree	787	37	378	92	232	47	0.3
Hay/Silage	8,983	602	2,901	1,359	1,625	2,476	20
Herb	3	3	-	-	1	0	-
Nursery	339	10	36	241	33	19	0.1
Orchard	102	34	14	35	12	7	-
Other	2,537	166	474	377	325	1,188	6
Pasture	11,019	523	3,975	1,224	2,111	3,158	28
Seed	240	111	110	15	3	1	0.04
Vegetable	181	52	71	26	4	27	0.6
Vineyard	78	3	48	8	13	5	0.004
Turfgrass	28	-	-	28	-	-	-
No Crops	76,913	2,857	29,355	8,189	25,407	10,620	486
Total Agricultural Land	**101,844**	**4,528**	**37,592**	**11,626**	**29,844**	**17,713**	**542**

Analysis of Indicators of Long-term Commercial Significance for Agriculture

With the agricultural land base identified, the third step of the analysis is to evaluate those lands for long-term commercial significance, as required by WAC 365-190-050(3)(c).[22] This WAC provision provides a guiding framework for the evaluation by listing eleven factors that can be used in the analysis. The rule states that "counties and cities *should* consider the following *nonexclusive* criteria, as applicable," which grants local jurisdictions the flexibility to tailor the analysis to their specific agricultural context. In short, the 11 criteria for long-term commercial significance are discretionary and jurisdictions can determine which, if any, of the criteria to apply. The review of methods used by other counties presented in Appendix B documents a range of approaches are used by other counties.

This study presents the analysis of these criteria in two stages. This preliminary analysis serves two primary functions. First, it provides a comprehensive record documenting the due diligence performed in exploring each of the eleven state-recommended criteria, ensuring a transparent process. Second, it serves to identify the most useful and significant criteria to carry forward into the final evaluation. This is a critical filtering step that helps to focus the final analysis on the factors and potential thresholds most relevant to Clark County. The WAC criteria from 365-190-050(3)(c) are:

[22] WAC 365-190-050(3)(c), https://app.leg.wa.gov/wac/default.aspx?cite=365-190-050

i) The classification of prime and unique farmland soils, and farmlands of statewide importance, as mapped by the Natural Resources Conservation Service;

ii) The availability of public facilities, including roads used in transporting agricultural products;

iii) Tax status, including whether lands are enrolled under the current use tax assessment under chapter 84.34 RCW and whether the optional public benefit rating system is used locally, and whether there is the ability to purchase or transfer land development rights;

iv) The availability of public services;

v) Relationship or proximity to urban growth areas;

vi) Predominant parcel size, which may include smaller parcels if contiguous with other agricultural resource lands;

vii) Land use settlement patterns and their compatibility with agricultural practices;

viii) Intensity of nearby land uses;

ix) History of land development permits issued nearby;

x) Land values under alternative uses; and

xi) Proximity to markets.

The following subsections examine each of these eleven criteria individually. For each factor, the analysis reviews available data, presents preliminary findings, and concludes with a determination of whether the criterion is suitable for inclusion in the final evaluation phase of this study.

Prime and Unique Soils

The first criterion for evaluating long-term commercial significance listed in WAC 365-190-050(3)(c)(i)[23] is "The classification of prime and unique farmland soils, and farmlands of statewide importance, as mapped by the Natural Resources Conservation Service." Prime Farmland is defined by the USDA NRCS as land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops. This analysis also considers lands of statewide importance, but it is important to note that no soils in Clark County are classified as "Unique Farmland."

The agricultural land base is characterized by a high prevalence of quality soils, as seen at the bottom of this subsection in Exhibit 21. Of the approximately 101,844 acres in the land base, about 94,271 acres, or 93 percent, are classified as Prime Farmland or Farmland of Statewide Importance. This broad definition includes soils that may require management, such as drainage or irrigation, to achieve their full productive potential. When a stricter definition is applied, including only those soils that are considered prime without significant

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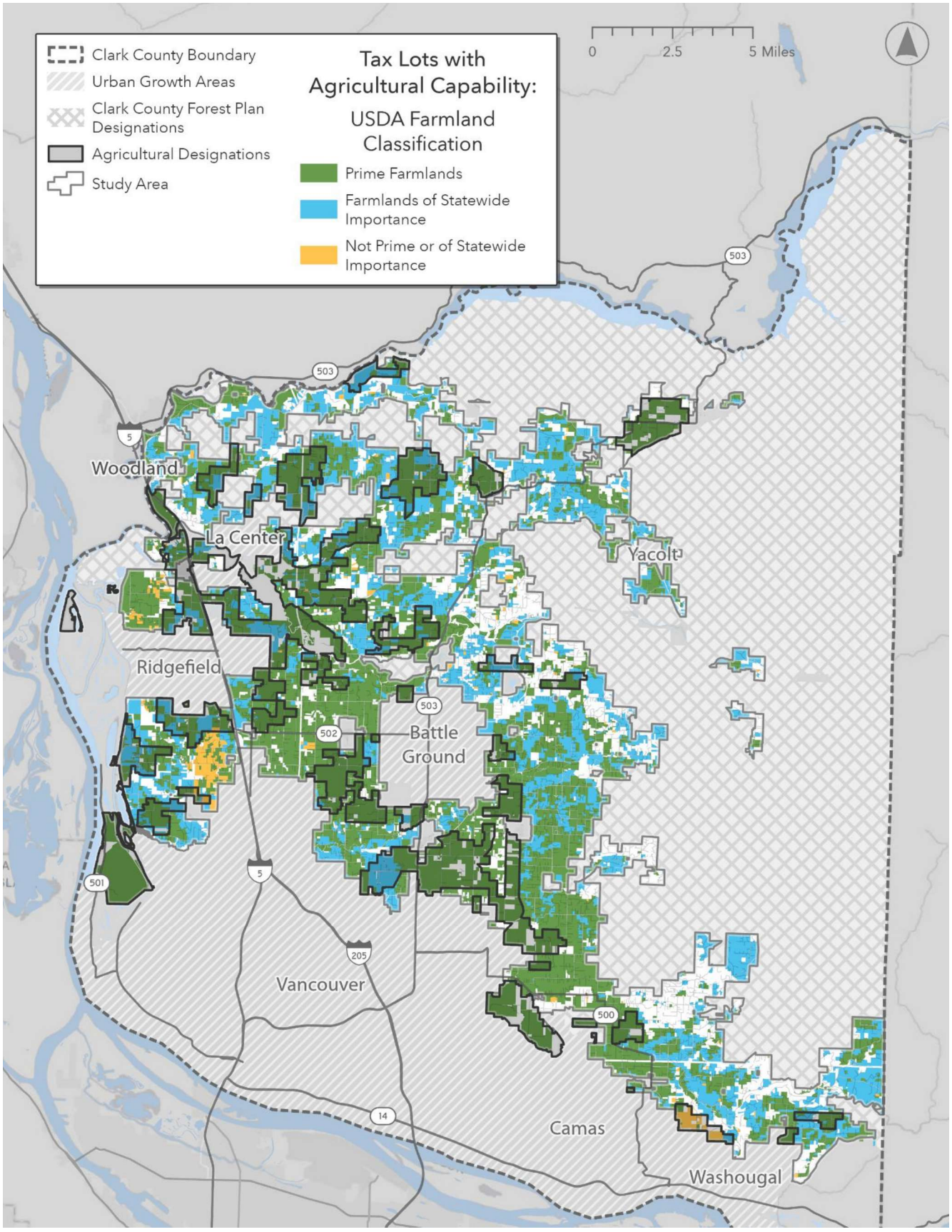
management, the total is still substantial at approximately 77,028 acres, or 76 percent of the agricultural land base.

A comparison between the lands currently within an agricultural designation and the non-designated portion of the agricultural land base reveals a similar high quality of soils across both geographies. Within the 28,181 acres of designated agricultural lands within the agricultural land base, 95 percent of the area contains prime soils under the broad definition. Within the much larger, non-designated portion of the land base (73,663 acres), 92 percent of the area contains these high-quality soils. This indicates that a vast resource of capable soils exists both within and outside of the county's currently designated agricultural areas.

Determination: The analysis indicates that Prime Farmland and Farmland of Statewide Importance comprise more than 90 percent of the agricultural land base. Because these classifications are so prevalent, they provide limited differentiation among parcels within the study area. Nonetheless, the Farmland Classification system remains a fundamental measure of inherent soil productivity and is widely applied in agricultural land studies across Washington. Given its importance in representing the natural capacity of soils and ensuring consistency with peer county analyses, this criterion will be carried forward for use in the final evaluation.

Exhibit 21. Primary Farmland Classifications



Source: USDA NRCS (2024), Clark County (2025)

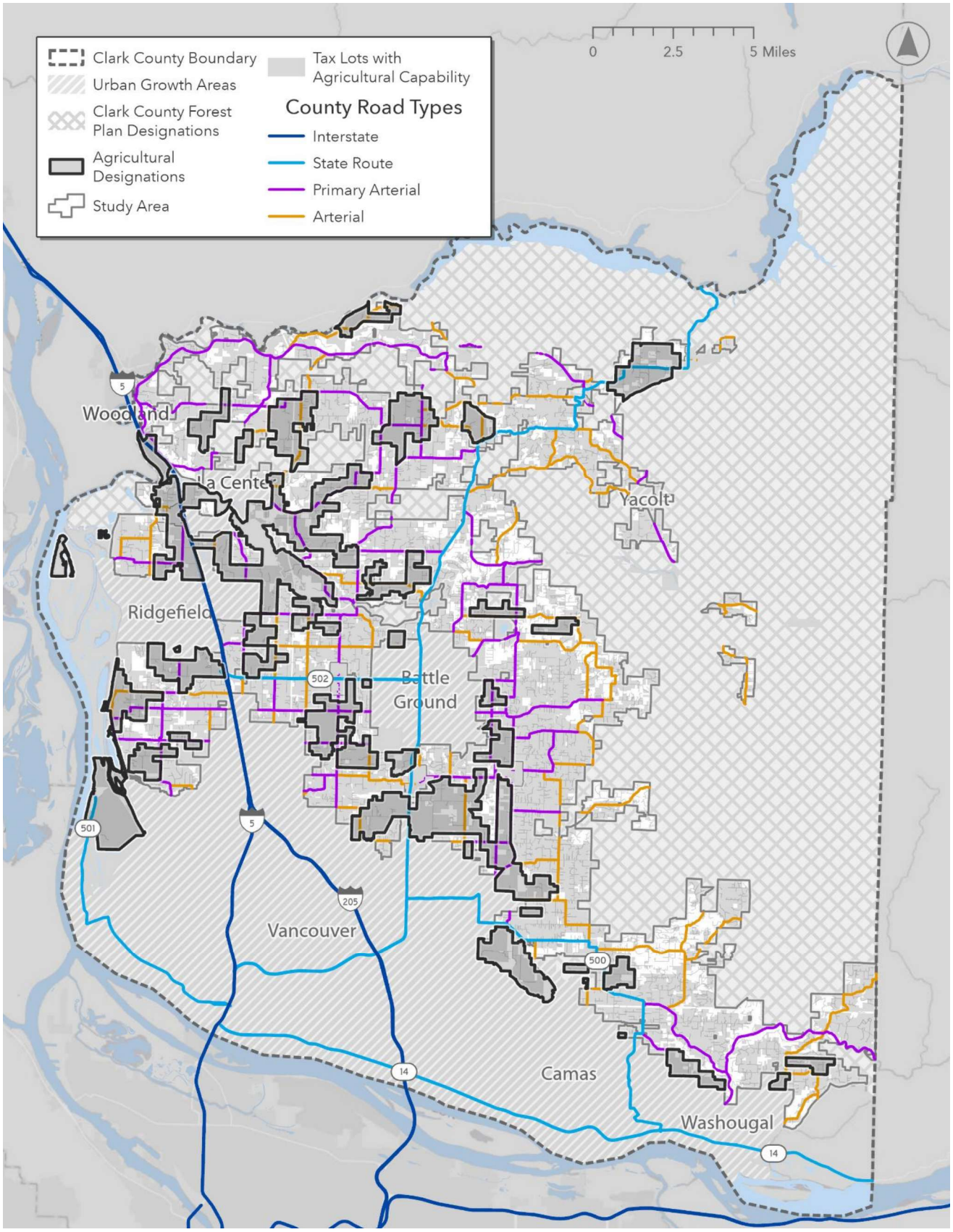
Public Facilities

The second criterion listed in WAC 365-190-050(3)(c)(ii) for evaluating long-term commercial significance is "The availability of public facilities, including roads used in transporting agricultural products." The intent of this factor is to assess whether farms have adequate access to the transportation network needed to move products to processing facilities, distribution centers, and markets. To evaluate this, the analysis used Clark County's road network data, shown below in Exhibit 22.

The methodology defined "major roads" as Interstates, State Routes, and Primary and Secondary Arterials, as these routes are essential for the efficient movement of agricultural goods. A one-mile buffer was applied to this major road network to identify all parcels in the agricultural land base with proximate access. This can be seen in Exhibit 23. The analysis found that the major road network is extensive and thoroughly serves the agricultural areas of the county. Within the approximately 101,844-acre agricultural land base, over 99 percent of the land is located within one mile of a major road. Specifically, 99.6 percent of parcels and 99.5 percent of the total acreage fall within this buffer. This near-universal access indicates that proximity to adequate transportation facilities is not a limiting factor for agriculture in Clark County.

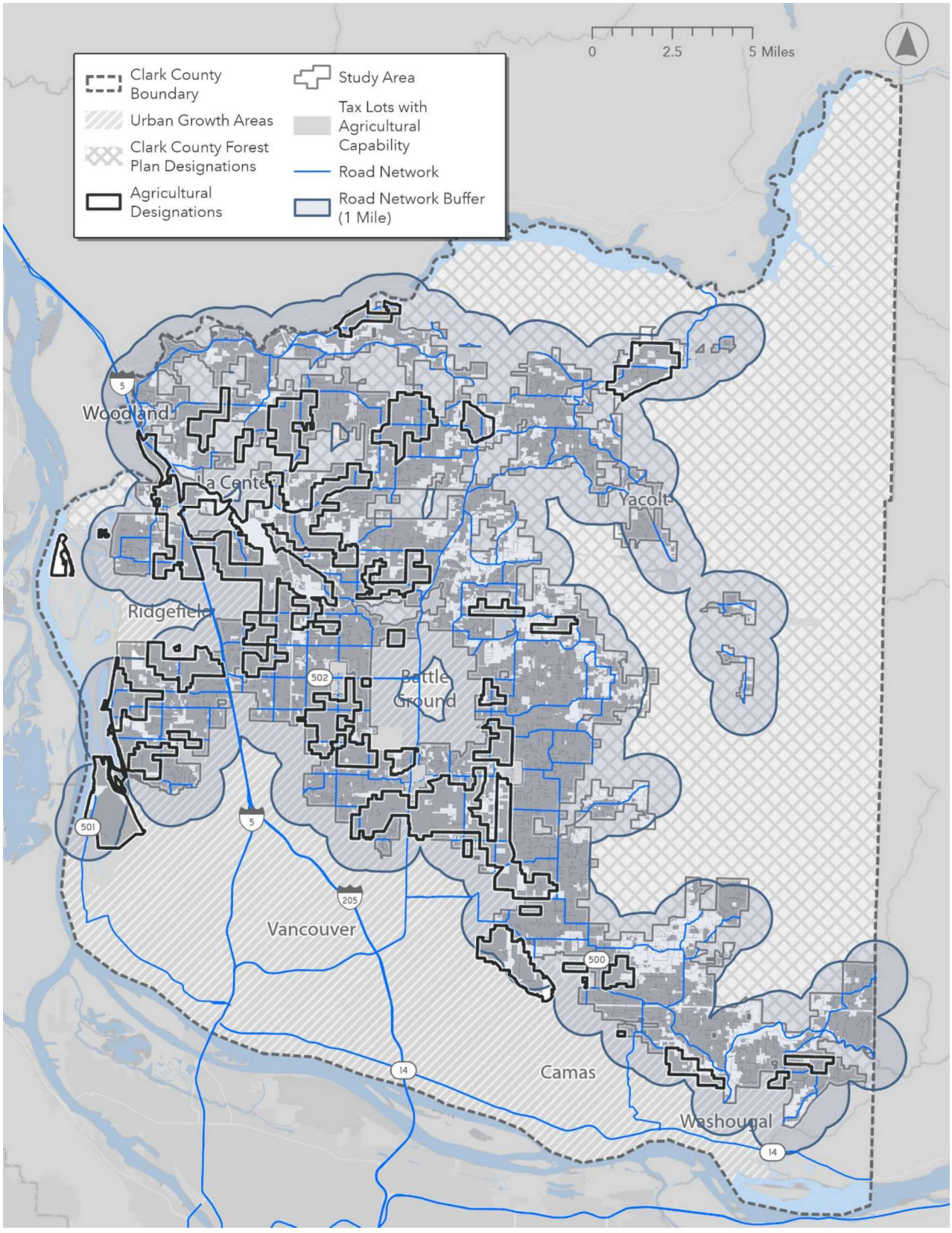
Determination: Both a visual inspection of the buffered road network and a statistical analysis confirm the all-encompassing nature of major road access for lands within the agricultural land base. The analysis shows that nearly every parcel has excellent access to the major road network. Because this condition is essentially universal across the entire analysis area, it does not serve as a useful metric for distinguishing between parcels or geographies. The availability of public road facilities is therefore not a significant differentiating factor for determining long-term commercial significance in Clark County. For this reason, **this criterion will not be utilized for use in the final evaluation**.

Exhibit 22. Study Area Road Network



Source: Clark County (2025)

Exhibit 23. Study Area Road Network 1-Mile Buffer



Source: Clark County (2025)

Tax Status

The third WAC criterion for analysis is tax status, which can include whether lands are enrolled in a current use tax assessment program. These programs act as a financial incentive for landowners to keep their property in agricultural production by assessing the land based on its current use value rather than its full market value. Enrollment in Washington's Farm and Agriculture Program is a strong signifier that a property is being actively farmed and that the landowner has made a commitment to its continued agricultural use. This is a common metric used in peer county agricultural land studies.

There are approximately 2,160 tax lots with a current use state in the study area, for a total lot acreage of 34,870 acres. Within the 18,420 parcels of the agricultural land base, 1,610 parcels (9 percent) are enrolled in the current use program. However, these enrolled parcels account for nearly 26,000 acres, or 25 percent of the total acreage in the land base. Within the county's 2,625 parcels in an agricultural designation, 830 parcels (32 percent) are enrolled in the program. These enrolled parcels comprise approximately 18,000 acres, which is 55 percent of the total designated agricultural land. Across the entire area of lands that are either in an agricultural plan designation or the agricultural land base, the tax lot acreage of tax lots enrolled in the current use program cover more than 27,070 acres, or 25 percent of the total combined area.

The distribution of parcels enrolled in this program can be broken into three distinct groups based on their location relative to the Agricultural Land Base and the Agricultural Designations.

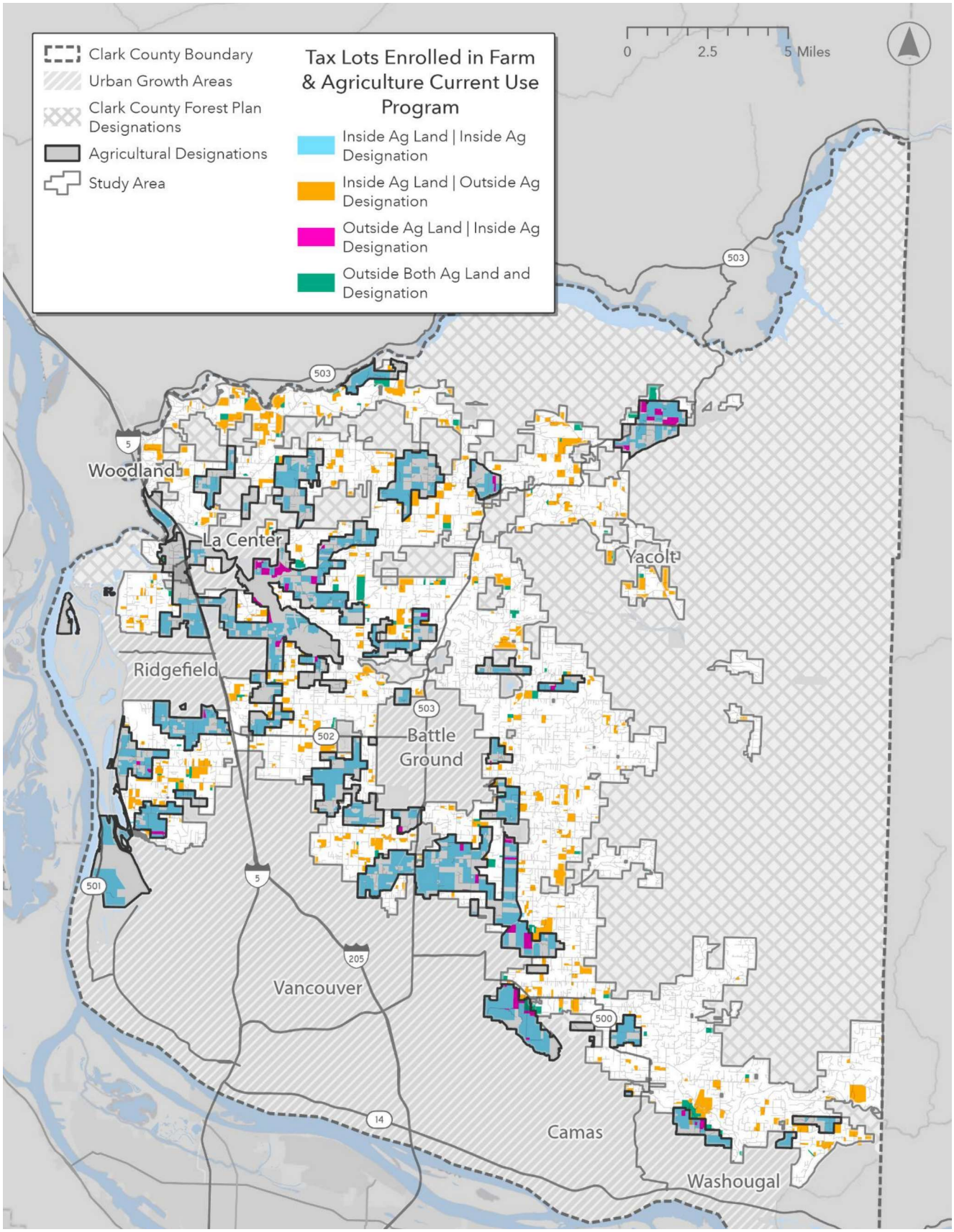
1. **Land Base Only:** 850 parcels (over 9,000 acres, 26%) are in the land base but *outside* a designation.
2. **Designation Only:** About 70 parcels (1,110 acres, 3%) are in a designation but *outside* the land base.
3. **Both:** 760 parcels (16,880 acres, 48%) are in *both* the land base and a designation. Together, these three groups account for nearly 78% of all CUP-enrolled land within the study area. This shows the vast majority of current use land is captured by at least one of these two agricultural geographies.

These spatial relationships can be seen in Exhibit 24, which also shows parcels enrolled in the current use program that are not within the land base **or** an agricultural land designation.

Determination: The analysis of tax status provides a strong correlation between a tax lot's current use program status and indicators of agricultural capability. A key finding is the clear nexus of agricultural activity where the land base and designations overlap, containing 48 percent of all current use acreage. Equally important for policy considerations is the finding that almost 78 percent of all current use land exists within either the agricultural land base or an agricultural land designation. This suggests the program itself is a strong indicator of agricultural commitment and could help identify areas for future conservation.

Therefore, **tax status is a relevant criterion** and will be carried forward for use in the final evaluation.

Exhibit 24. Parcels within Washington's Farm and Agriculture Current Program



Source: Clark County (2025)

Availability of Public Services

The analysis next considers "The availability of public services," a criterion that can indicate the level of development and residential character in an area. While RCW 36.70A.030(35)[24] provides a broad definition of public services, including fire protection, public health, and education, translating these concepts into measurable data is less straightforward than for physical infrastructure like roads.

This analysis explored the proximity of the agricultural land base by applying a one-mile buffer to three types of public services: Fire stations, healthcare facilities, and schools. By combining these individual service areas, the analysis also created a comprehensive dataset to evaluate the overall extent of public service availability across the agricultural landscape.

An evaluation of the individual services shows that proximity to fire stations within a 1-mile buffer is the most widespread, covering approximately 22,830 acres (22 percent) of the agricultural land base and 7,030 acres (22 percent) of the agricultural designations. Access to schools shows a similar pattern, with about 20,370 acres (20 percent) of the land base and 7,720 acres (24 percent) of the designations falling within the one-mile buffer. Proximity to healthcare facilities is far more limited, covering less than one percent of either the land base (356 acres) or the designated areas (224 acres).

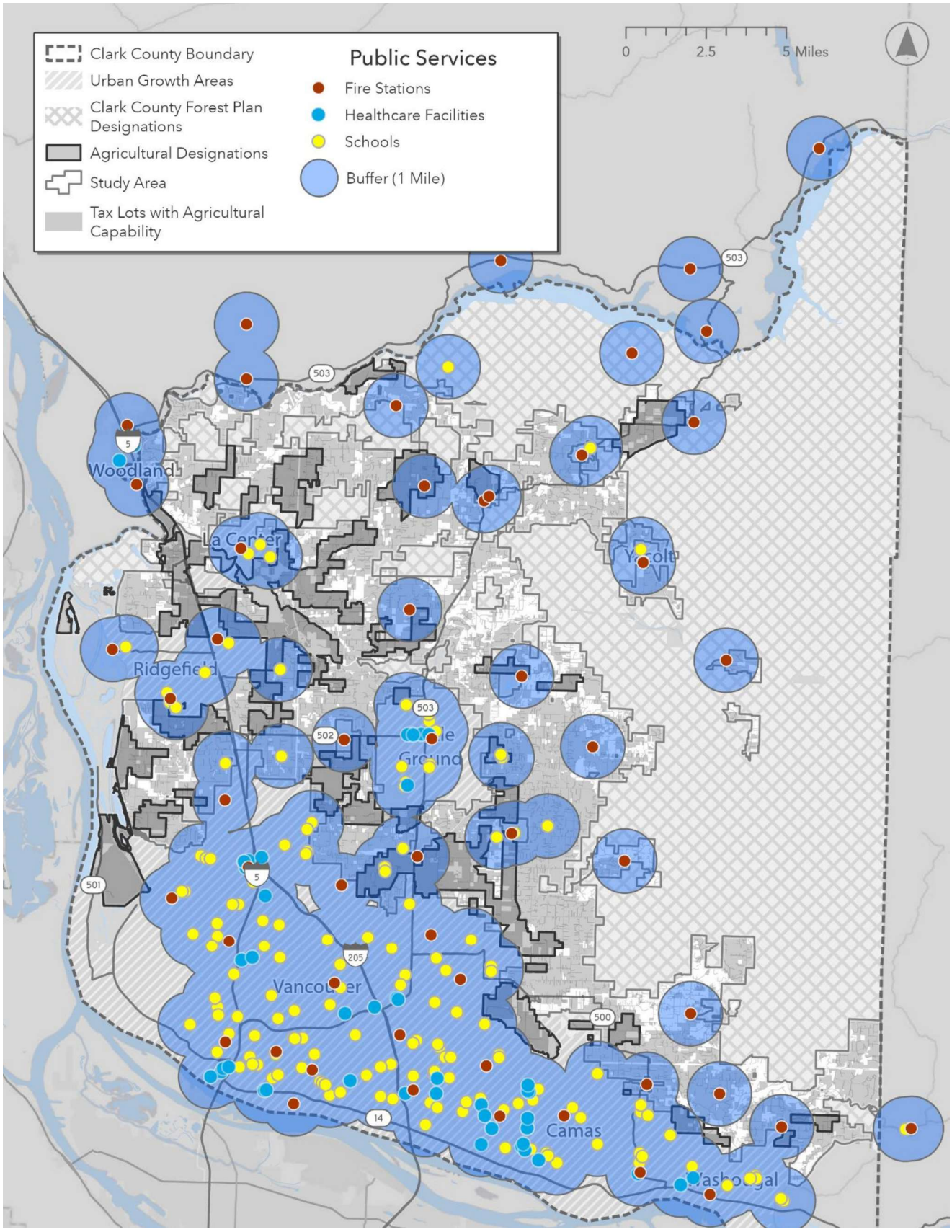
The comprehensive, merged buffer covers a substantial portion of the agricultural landscape, including 37,025 acres, or 36 percent of the agricultural land base, and 11,919 acres (37 percent) of the agricultural designations. Of the total acreage within this service area, the majority, approximately 26,706 acres, is located in the non-designated portion of the land base. The remaining 10,320 acres are located within the part of the land base that is also in an agricultural designation. The public service points and the merged one-mile buffer can be seen in Exhibit 25.

Determination: The use of applying public service proximity as a negative indicator for commercial significance (as often has been in practices by other peer counties) raises concerns due to its sizeable effect on existing agricultural land designations. If used this way, the comprehensive one-mile buffer would impact over one-third (37 percent) of all currently designated agricultural lands. Given that the county has already seen a 38 percent reduction in total farmland from 2017-2022,[25] the effect of applying a criterion that affects such a substantial portion of the remaining designated land must be considered very carefully. Additionally, concerns about its impact to lands in agricultural designations also bring into question its viability as a criterion for the larger land base as well. Due to these concerns, **this criterion will not be included** in the final evaluation model.

[24] Revised Code of Washington (RCW) 36.70A.030(35). "Definitions." https://app.leg.wa.gov/rcw/default.aspx?cite=36.70a.030

[25] United States Department of Agriculture. *2022 Census of Agriculture County Profile: Clark County Washington*. https://www.nass.usda.gov/Publications/AgCensus/2022/Online_Resources/County_Profiles/Washington/cp53011.pdf.

Exhibit 25. Public Service Types and 1-Mile Buffer



Source: Clark County (2025)

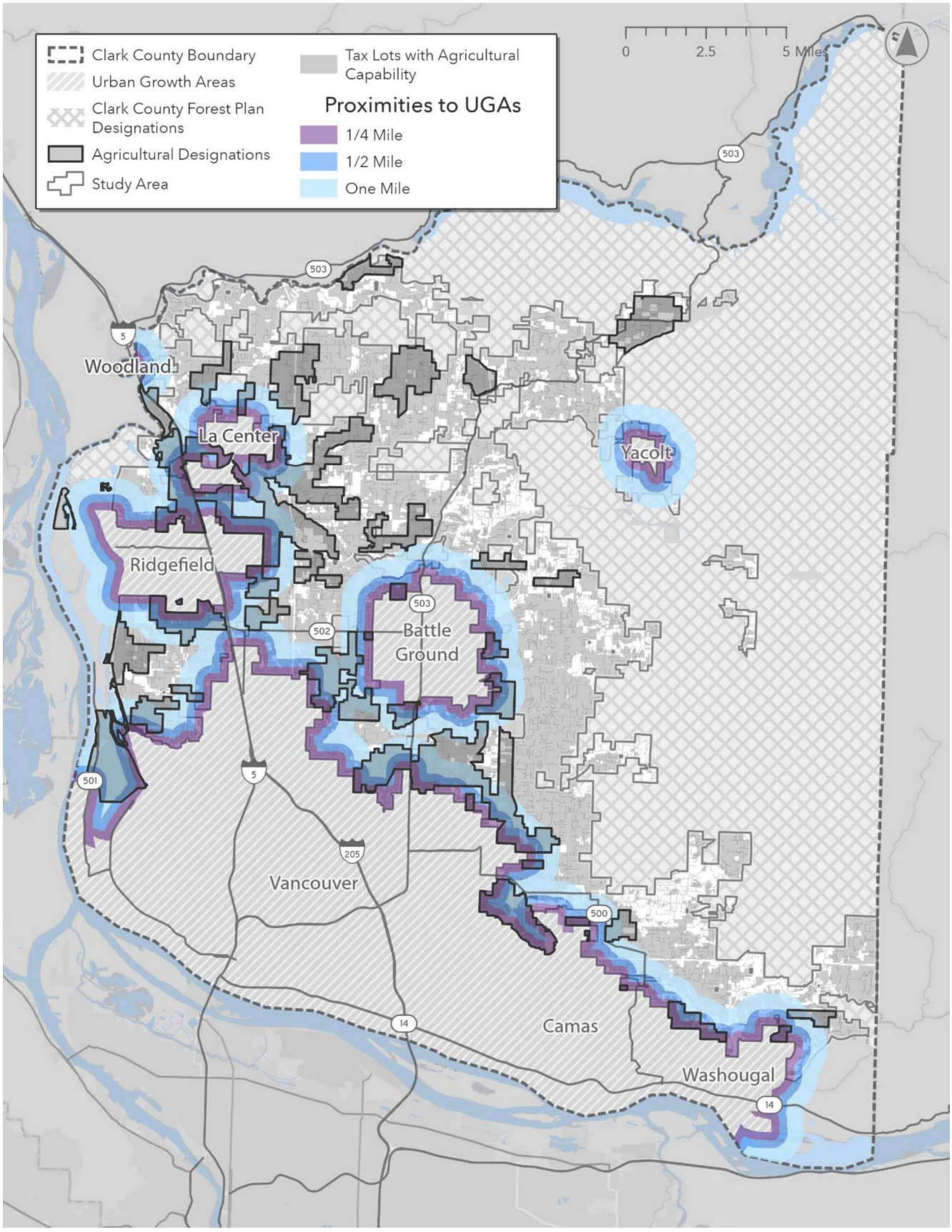
Proximity to Urban Growth Areas

This section evaluates the proximity of agricultural lands to Urban Growth Areas (UGAs), a WAC criterion often used as a proxy for development pressure and potential land use conflicts. The logic is that lands closer to areas planned for urban development are more likely to face pressure to convert to non-agricultural uses over the long term. This analysis measured this factor by applying a series of buffers at quarter-mile, half-mile, and one-mile distances from all UGA boundaries, as seen in Exhibit 26.

The results show a large portion of agricultural land is situated near Urban Growth Areas (UGAs). Within the agricultural land base, approximately 12,070 acres (12 percent) are located within a quarter-mile of a UGA. This increases to nearly 23,000 acres (23 percent) within a half-mile and 42,030 acres (40 percent) within one mile. A similar, though more drastic, pattern exists for the county's agricultural designations, where 18 percent of the area (4,800) is within a quarter-mile, 35 percent (11,400) is within a half-mile, and 59 percent (19,350) is within one mile of a UGA.

Determination: The unique spatial relationship between agricultural lands and UGAs raises concerns similar to those identified with public service proximity. When applied as a negative indicator of agricultural commercial significance, this relationship would affect nearly one-fifth of designated land at the quarter-mile buffer and almost 60 percent at the one-mile buffer. As with the public service proximity criterion, the scale of this impact warrants caution. Therefore, **this criterion will not be included in the final evaluation model**.

Exhibit 26. Proximity to UGAs



Source: Clark County (2025)

Predominant Parcel Size

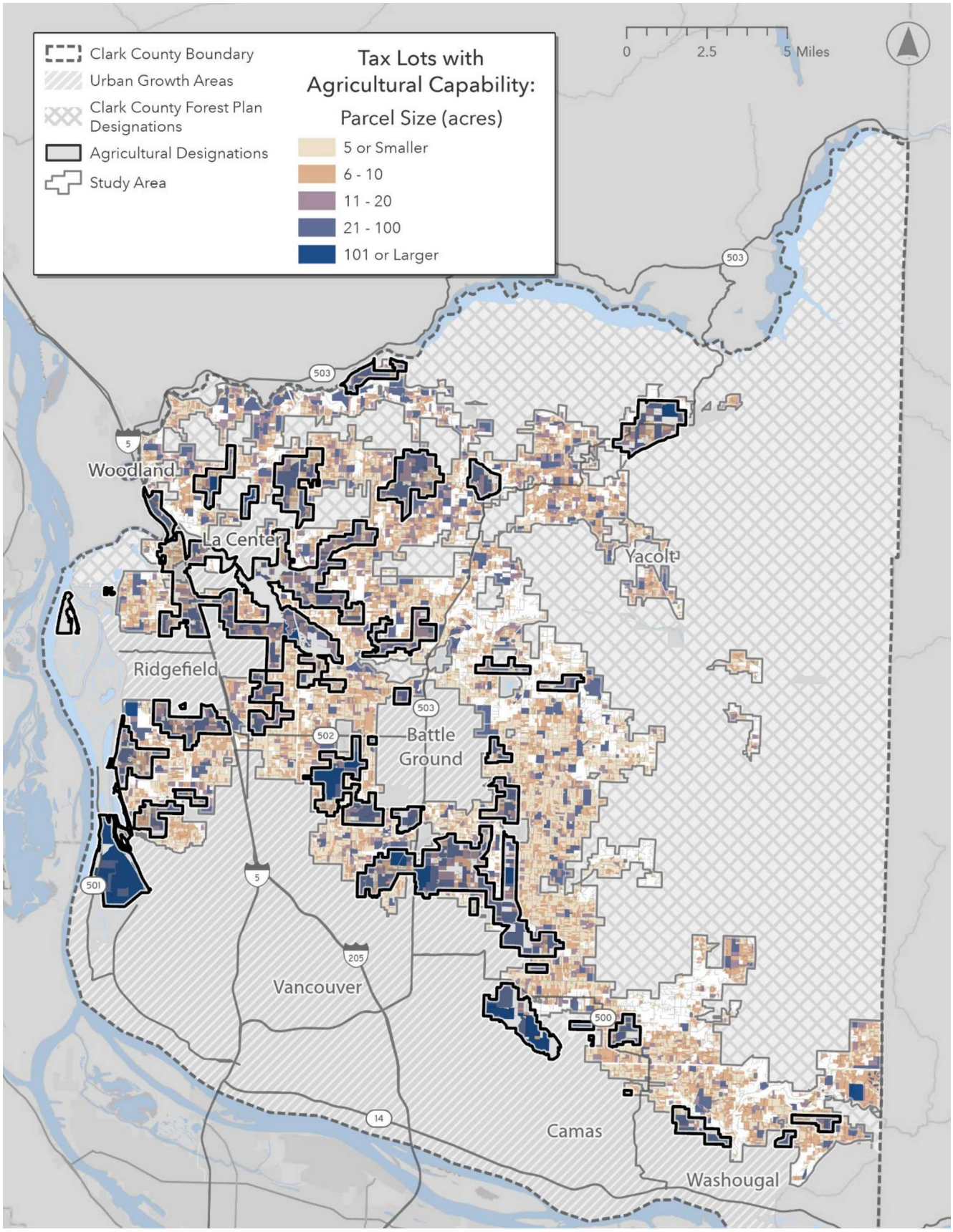
This section evaluates predominant parcel size, a WAC criterion that serves as a direct measure of land fragmentation. The viability of commercial agriculture often depends on the availability of large, contiguous blocks of land. A landscape fragmented into many small parcels is generally less suited for commercial production and more indicative of rural development, which can create conflicts with farming.

The analysis reveals that the agricultural land base in Clark County is highly fragmented, which can be seen in Exhibit 27. The average parcel size is 5.5 acres, with a median of 4.6 acres. Ninety-six percent of all parcels in the land base are smaller than 20 acres, the current minimum lot size for the county's AG-20 zone. These smaller, "non-conforming" parcels account for 75 percent of the total acreage in the land base. This means that a significant majority of the land identified as agriculturally capable or in use is held in parcels that are below the minimum lot size established by county's primary agricultural zoning designation (AG-20).

A comparison between the designated and non-designated portions of the land base highlights how the current designations have targeted less-fragmented areas. The average parcel size within the agricultural designations is 12.4 acres, nearly three times larger than the average of 4.6 acres for the non-designated rural lands. Furthermore, within the designated lands, parcels of 20 acres or more make up 56 percent of the acreage. In contrast, for the rest of the agricultural land base, these larger parcels account for a much smaller share of the landscape (only 24 percent).

Determination: Parcel size is a powerful indicator of land fragmentation, which can be detrimental to the long-term viability of the agricultural economy. The data provides clear evidence of this fragmentation across the agricultural land base and quantifies the extent to which existing parcels do not conform to current zoning, however many of those smaller parcels are currently being farmed. Excluding non-conforming parcels may diminish the land to be where it can't support an agricultural economy. As this study is intended to provide data to inform future policy dialogue, this information is critical. For this reason, **predominant parcel size is a relevant criterion** and will be included in the final analysis.

Exhibit 27. Predominant Parcel Size



Source: Clark County (2025)

Land Use Settlement Patterns

This section evaluates land use settlement patterns, a WAC criterion that is not explicitly defined but is often measured by analyzing parcelization trends. Following the practice of other Washington counties, this study examined land divisions that occurred over a 20-year period (2005-2024) with agricultural designations and the agricultural land base to understand how the rural landscape has changed. The analysis compared the original parcels involved in divisions ("parent parcels") to the new parcels that were created ("resulting parcels"), considering parcel counts, total acreage, and median parcel sizes. The results are visualized in Exhibit 28.

Over the 20-year period, more than 860 parent parcels within the agricultural land base, totaling approximately 15,870 acres, were divided. A significant portion of this activity originated on larger tracts; 260 of these parent parcels, representing 10,750 acres (68 percent of the total parent acreage divided), were originally 20 acres or larger, with a median size of roughly 37 acres. Land divisions within the land base occurred predominantly outside of existing agricultural designations, with about 710 parent parcels located there, accounting for about 11,040 acres or 70 percent of the total parent acreage divided within the land base.

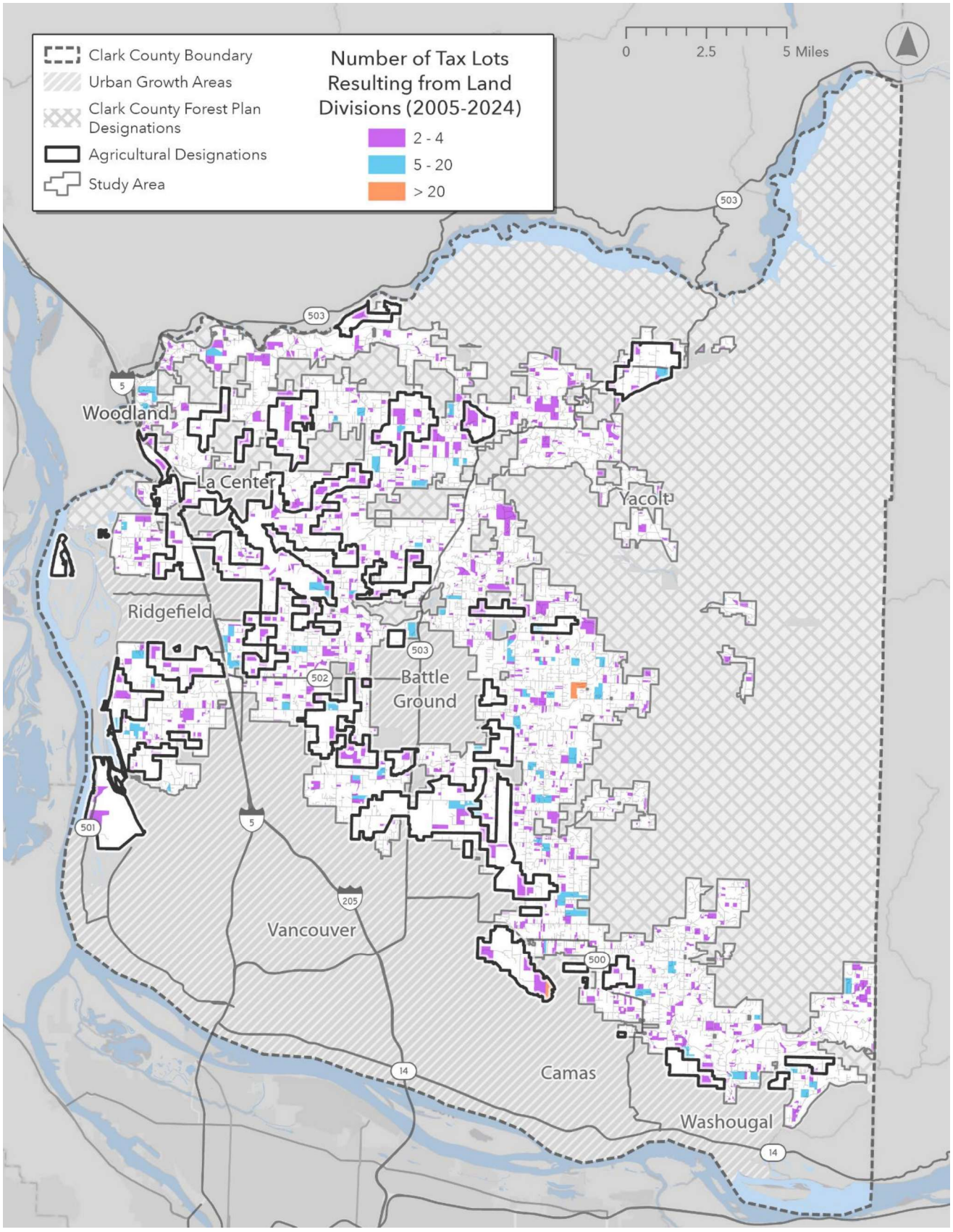
By 2024, these 860 parent parcels transformed into 2,070 resulting parcels. The most frequent outcome was a parcel between 1 and 5 acres; this category comprised 975 resulting parcels (47 percent of all resulting parcels), though these smaller lots only accounted for about 3,000 acres (20 percent of the total resulting acreage). Within the land base, this creation of small lots was again concentrated outside agricultural designations, where 918 of these 1-to-5-acre parcels (representing 94 percent of the acreage in this size category) were formed.

Within the county's agricultural designations as a whole, the pattern differed. The 150 parent parcels involved in divisions resulted in more than 350 new lots. Here, the most common resulting sizes were larger: more than 100 lots (representing about 1,680 acres) fell into the 10-to-20-acre category with a median size of 18.9 acres, however the largest geographic area impacted was among lots in the 20 acres or later group at almost 100 lots, representing 3,460 acres with a median size of 22 acres. These two larger size categories accounted for 88 percent of the resulting acreage within designated areas.

While the total number of resulting parcels (2,100) and affected acreage (16,000 acres) over two decades may appear substantial, the average annual rate of change provides a different perspective. Within the nearly 102,000-acre agricultural land base, this equates to an average creation of just over 100 new parcels per year, impacting about 800 acres annually. Relative to the overall size of the land base, this represents a modest annual conversion rate. The rate within the ~32,589-acre agricultural designations is even lower, averaging about 18 new parcels created per year and affecting approximately 290 acres annually. Furthermore, GIS analysis cannot easily distinguish multiple divisions of the same original parcel over time, potentially inflating the perceived rate of initial fragmentation.

Determination: The analysis of land division activity offers useful context, confirming a slow trend towards land fragmentation. However, when averaged over the 20-year study period, the rate of parcel creation and acreage affected is relatively low, particularly within the existing agricultural designations. This suggests that recent settlement patterns, while present, are not occurring at a scale that provides a strong basis for differentiating long-term commercial significance across the agricultural land base compared to more dominant factors like parcel size itself. Therefore, **land use settlement patterns will not be included as a criterion in the final evaluation model.**

Exhibit 28. Land Divisions Over 20 Years (2005-2024)



Source: Clark County (2025)

Intensity of Nearby Land Uses

This section evaluates the intensity of nearby land uses, a WAC criterion intended to assess the potential for conflict between agricultural and non-agricultural activities. A common method for measuring this is to analyze the characteristics of parcels directly adjacent to agricultural lands. Following this approach, the study identified all parcels bordering the agricultural land base and calculated their median size as a proxy for development intensity.

The data reveals a consistent pattern at the interface of agricultural and other rural lands. The 5,483 parcels adjacent to the agricultural land base have a median size of 4.9 acres. Of those parcels, 312 of them are designated agricultural lands and have a median size of 5.2 acres. Across all adjacent parcels, sizes vary widely—from 0.02 to 694 acres for all adjacent parcels and from 0.1 to 110 acres for those within agricultural designations. The mean parcel sizes (10.2 acres for non-designated lands and 11.1 acres for designated lands) suggest that overall parcel size characteristics are broadly comparable between the two groups. However, parcels in agricultural designations exhibit a smaller range of sizes and slightly larger typical parcel sizes on average.

Furthermore, the analysis looked at the parcels adjacent to the agricultural designations and found that whether an adjacent parcel was *in* the agricultural land base or *not* made almost no difference to its size. The median size of adjacent parcels that were also in the land base was 5.0 acres, while the median size for those that were not was 4.6 acres. The average size of all parcels adjacent to the designated agricultural lands was 8.7 acres, while the subset of adjacent parcels in the land base is 6.3 acres. This uniformity suggests that the "intensity" at the edge of designated agricultural lands is a consistent feature of the landscape and does not vary enough to be a useful analytical variable.

Determination: The intensity of nearby land uses, as measured by the size of adjacent parcels, does not provide a clear or consistent signal for evaluating long-term commercial significance. The median size of adjacent parcels is notably uniform across the study area, and the fact that most adjacent parcels are also within the agricultural land base creates an ambiguous result. Due to this lack of differentiating power and interpretive difficulty, **this criterion will not be included** in the final analysis.

History of Land Development Permits Issued Nearby

This section evaluates the history of land development permits issued near the agricultural land base. This WAC criterion provides another lens through which to view land use change and potential incompatibility, complementing the previous analyses of parcel size and settlement patterns. By examining the location and frequency of building permits for new structures or units, it is possible to quantify the rate of residential encroachment into agricultural areas. A high density of recent permits can indicate that an area's character is shifting away from resource production and toward residential use, which is a key consideration for evaluating long-term commercial significance.

Between 2005 and 2024, Clark County issued permits for 1,480 new residential units directly within the 101,840-acre agricultural land base, each on its own tax lot for a total of 8,070 acres. This represents an average of about 74 units permitted per year within the land base. Activity was lower within the 32,590 acres currently under agricultural designation, where permits were issued for 180 new units on 180 parcels (1,700 acres), averaging about 9 units per year.

To assess development pressure *nearby*, the analysis examined permit activity within a one-mile buffer surrounding these areas. In the buffer zone around the agricultural land base, permits were issued for 6,420 new residential units over the 20-year period, affecting 6,300 parcels (15,180 acres). This averages approximately 317 units permitted annually within the buffer. Similarly, the one-mile buffer around the agricultural designations saw 4,810 permits issued (affecting 4,700 parcels at about 9,980 acres), averaging about 240 units per year. It is important to note that these one-mile buffers extend significantly into adjacent Urban Growth Areas (UGAs), meaning the higher permit counts likely reflect urban development patterns rather than solely rural encroachment pressure.

Determination: While building permit data offers a direct measure of new residential development, interpreting its significance as an indicator of incompatibility or diminishing commercial viability presents several challenges. Defining appropriate thresholds for "nearby," selecting relevant timeframes, and contextualizing permit density relative to existing development patterns require complex assumptions. Furthermore, the relatively low number of units permitted directly within the expansive agricultural land base raises questions about the consistency or completeness of the permit data over the 20-year period. Given these analytical difficulties, potential data quality considerations, and the overlap with other criteria like parcel size and proximity to UGAs, **this criterion will not be included in the final evaluation**.

Land Values Under Alternative Uses

This criterion involves comparing the economic value of land for agricultural production against its potential value if converted to non-agricultural uses, such as residential or commercial development. During public engagement, including discussions with the Clark County Agricultural Advisory Commission, stakeholders expressed concerns about the practical utility of this factor. It was consistently noted that land values for development purposes are inherently higher than for farming across most, if not all, of the study area. This predictable outcome limits the criterion's usefulness in differentiating lands based specifically on their long-term *agricultural* significance. This perspective aligns with practices in peer Washington counties, where this factor is rarely analyzed quantitatively.

Determination: Because the value of land for alternative uses (residential, commercial) consistently exceeds its agricultural value throughout the county, this factor does not provide a meaningful basis for distinguishing between parcels within the agricultural land base. Based on this inherent limitation and stakeholder feedback questioning its relevance

in the Clark County context, **land values under alternative uses will not be included as a criterion in the final evaluation model.**

Proximity to Markets

The final WAC criterion suggests evaluating a property's proximity to markets as an indicator of long-term commercial significance. The underlying principle is that easier access to points of sale, processing facilities, or distribution hubs can enhance a farm's viability. However, defining and measuring "proximity to markets" in a consistent and meaningful way presents challenges. What constitutes a relevant "market" can vary significantly depending on the type of agricultural product (e.g., direct-to-consumer stands, local processors, regional distribution centers).

Furthermore, during public engagement, including discussions with the Clark County Agricultural Advisory Commission, stakeholders indicated that market access is generally not considered a significant limiting factor for agriculture within the county. The relatively compact geography and extensive road network mean most farms have comparable access. This perspective is supported by the findings in the "Public Facilities" analysis, which demonstrated near-universal access (over 99 percent coverage) to major roads within a one-mile buffer across the agricultural land base.

Determination: Defining relevant markets and measuring proximity in a way that differentiates properties across Clark County proved analytically complex. Combined with stakeholder feedback suggesting generally uniform market access and the separate analysis confirming widespread access to major transportation routes, this criterion offers limited value for distinguishing long-term commercial significance within the agricultural land base. Therefore, **proximity to markets will not be included as a criterion in the final evaluation model.**

Water Rights

A significant topic raised during public engagement, particularly by the Clark County Agricultural Advisory Commission, was the role of water rights and irrigation. The feedback highlighted a clear tension: on one hand, the possession of water rights, which enable irrigation, can inherently increase a farm's commercial value. It allows for a greater diversity of high-value crops and can boost overall productivity. Commission members provided examples of irrigation acting as a "productivity multiplier," enabling a switch from lower-revenue grain farming to direct-to-market operations that create significantly more jobs and revenue per acre. For some farms, especially those on lower-quality soils, water access is the single most important variable for success.

An analysis of active water rights[26] pertaining to agriculture and irrigation found a total of 507 water right units within the study area, covering a sum of 9,950 irrigated acres. Tax lots with these rights can be seen in Exhibit 29. The data shows these rights are distributed across the landscape:

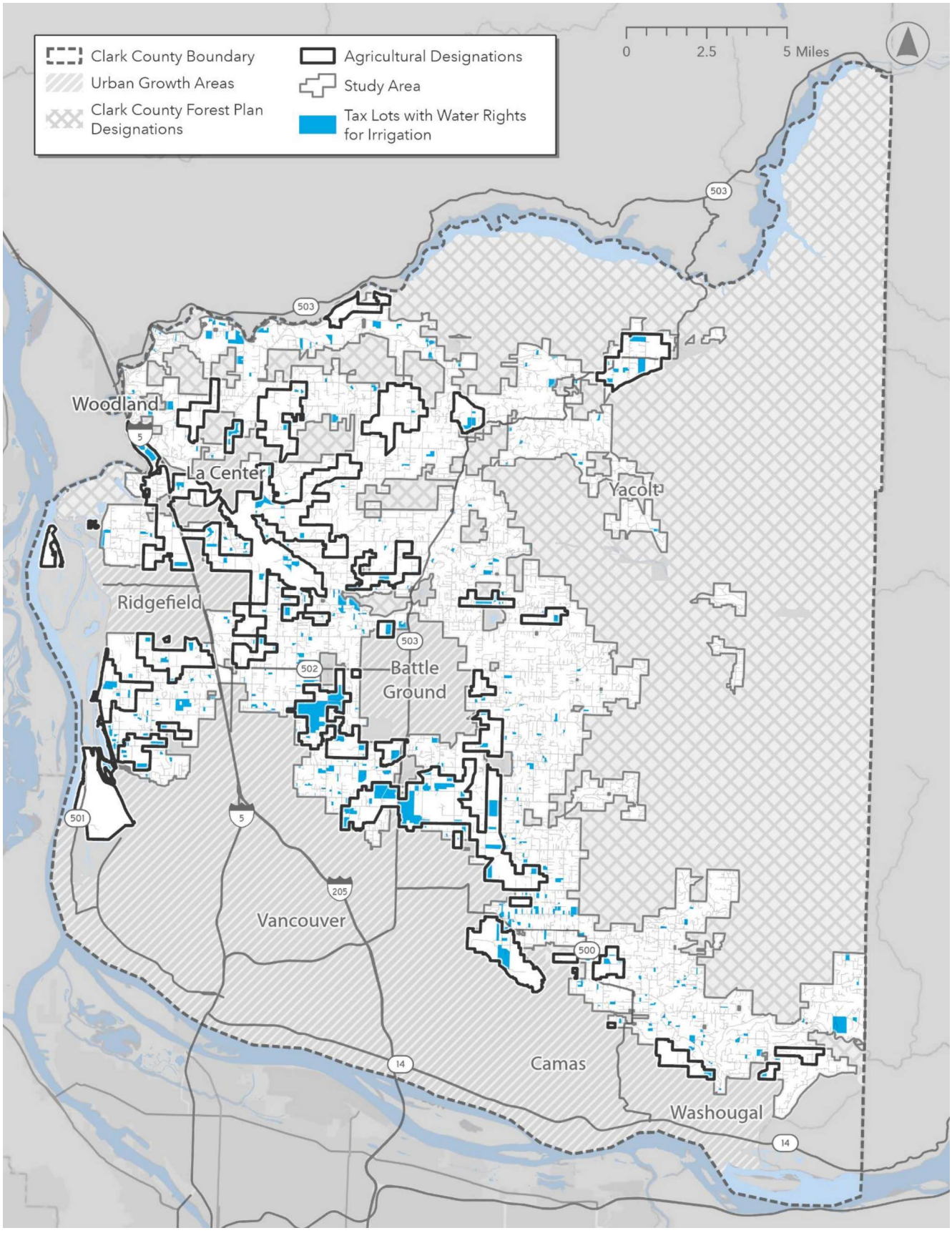
- 117 permits (covering 5,000 irrigated acres) are located within *both* the agricultural land base and an agricultural designation.
- 324 permits (4,100 acres) are in the agricultural land base but *outside* a designation.
- 9 permits (340 acres) are in an agricultural designation but *outside* the Land Base.
- 57 permits (560 acres) are in *neither* geography.

However, concerns were also expressed that using water rights as a formal criterion would be inequitable. They noted that water rights are "irreplaceable" and extremely difficult to obtain. An analysis based on water rights would devalue the long-term significance of productive dryland farming operations, which are common in the county for crops like hay, grass seed, and hazelnuts. Furthermore, it would overlook the significant amount of water accessed via exempt wells, which are particularly important for smaller-acreage farms. Essentially, using water rights as a positive criterion would simultaneously act as a negative criterion against productive dryland farms and farms with an inability to obtain them.

Given this feedback and acknowledging that water access is not a formal criterion under WAC 365-190-050(3)(c), the study recognizes water rights as a key variable but does not use it as a formal indicator. Its impact is not uniform; while it enhances the value of some farms, its absence does not preclude the commercial viability of others.

[26] Washington State Department of Ecology. 2025. Water Resources Web Map. Retrieved from https://ecology.wa.gov/regulations-permits/guidance-technical-assistance/water-rights-search. Accessed October 2025.

Exhibit 29. Washington State Department of Ecology Water Rights Map



Source: Washington State Department of Ecology (2025)

Food Security

Beyond the primary criteria for agricultural land designation, Washington Administrative Code (WAC) 365-190-050(4)[27] explicitly permits counties to "consider food security issues." This can include "providing local food supplies for food banks, schools and institutions, vocational training opportunities in agricultural operations, and preserving heritage or artisanal foods." In line with this provision and reflecting a key goal of this agricultural lands study, food security was identified as a critical component of the county's agricultural landscape.

This concept of food security—the ability of all people at all times to access enough food for an active, healthy life[28]—remains an important consideration. In Clark County's 2024 Community Needs Assessment Report, food assistance emerged as a critical need by 87% of survey respondents.[29] And according to Feeding America, Clark County's food insecurity rate is 10.2%, slightly higher than the state average (8.9%).[30] This reflects a continuing need for accessible, affordable food. The county's 2015-2035 Comprehensive Plan acknowledges food security as a policy priority. Goal 11 in the environmental element promotes the advancement of local, sustainable food production with a policy commitment to foster "a safe, secure future that conserves natural resources while meeting basic human needs, including...food."[31]

Emphasis on the significance of food security was echoed in this study's community engagement. Residents repeatedly raised food security as a top concern in interviews, public comments, and Clark County Agricultural Advisory Commission meetings. Key takeaways include two major topics: food banks are a major market for local farmers and farms that are close in proximity to cities, markets, and residents strengthen food security.

Currently, Clark County Food Bank operates as the county's central food bank and works with 57 agencies in over 120 distribution sites. In 2024, the food bank distributed 10 million pounds of food.[32] 2.17 million pounds of food come from wholesale sellers, 382,594 pounds came from local farms, and 35,512 pounds are from community gleaning programs. In total, 148,515 individuals received food through partner agencies and Clark County Food Bank programs.[33] Food banks provide a consistent market for local farmers to sell surplus produce which in turn increases food security for community members. This unique

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[27] Washington Administrative Code (WAC). § 365-190-050(4)(b). https://app.leg.wa.gov/wac/default.aspx?cite=365-190-050

[28] United States Department of Agriculture. "Nutrition Security Research and Resources." https://www.ers.usda.gov/newsroom/trending-topics/nutrition-security-research-resources

[29] Clark County. *2024 Community Needs Assessment Report*. May 2024. https://clark.wa.gov/sites/default/files/media/document/2024-08/cna2024_web_pages_0.pdf

[30] Feeding America. "Food Insecurity among the Overall Population in Washington." https://map.feedingamerica.org/county/2021/overall/Washington

[31] Clark County. *20 Year Comprehensive Growth Management Plan 2015-2035*. https://clark.wa.gov/sites/default/files/media/document/2024-05/2015-2035-comprehensive-plan-ord-2023-08-02.pdf.

[32] Clark County Food Bank. "Our Network." https://www.clarkcountyfoodbank.org/our-network

[33] Clark County Food Bank. *2024 Annual Report*. https://static1.squarespace.com/static/53135c62e4b01148f94ea635/t/687054707a1a705d0712c0ac/1754072216252/Annual+Report+2024+R2_v02.pdf.

relationship between local farms and food banks benefits both food banks, farmers, and people in need of food.

Proximity of farms to consumers increases the viability of direct-to-consumer sales, which is another contributor to food security. According to the 2022 USDA Census of Agriculture, 324 (16.9 percent) of farms in Clark County sell direct to consumer, accounting for $3.46 million (5.9 percent) of total sales. While the number of direct-to-consumer farms has decreased since 2012 (from 410 to 324), the total value of sales has grown significantly (from $2.09 million to $3.46 million), suggesting consistent demand and economic sustainability for those remaining in this market.

Community Supported Agriculture (CSA) is a notable model of direct-to-consumer sales, where consumers subscribe to receive a share of produce directly from farms. Produce is packed directly from a single farm or a collective of local farms, ensuring sales support farmers rather than intermediaries.[34] According to the Eat Local First Collaborative, made up of regional partner organizations around the state, there are 299 CSAs in Washington, with 13 of them located in Clark County.[35] Although CSAs represent a small portion of total farm sales, their community-based model contributes to regional food security, agricultural education, and consumer awareness of local food systems. In the context of this study, CSA participation illustrates how land use decisions can influence not just where food is grown, but how communities connect to and benefit from it.

While food security outcomes may not be directly measurable through the GIS or land cover datasets central to this analysis, they are a critical qualitative factor in understanding the broader implications of agricultural land designation. As this study informs the County's initiative to review these designations, the stability of food bank networks and strong farm-to-market linkages are vital considerations for a resilient and equitable local food system. The continued conversion of these lands to non-farm uses poses a direct risk to this system, as it may eventually undermine the viability of the local agricultural economy upon which these food security networks depend.

Key Findings

This analysis of the agricultural land base (101,844 acres) and the lands currently in agricultural designations (32,589 acres) focused on the three primary indicators of long-term commercial significance identified in the previous section: soil quality, tax status, and predominant parcel size. A comparison of these two geographies reveals several key findings:

The classification of Prime Farmland and Farmland of Statewide Importance serves as a foundational measure of the land's inherent productive capacity. As shown in Exhibit 30, this high-quality soil is a widespread asset across Clark County. The analysis found that 98

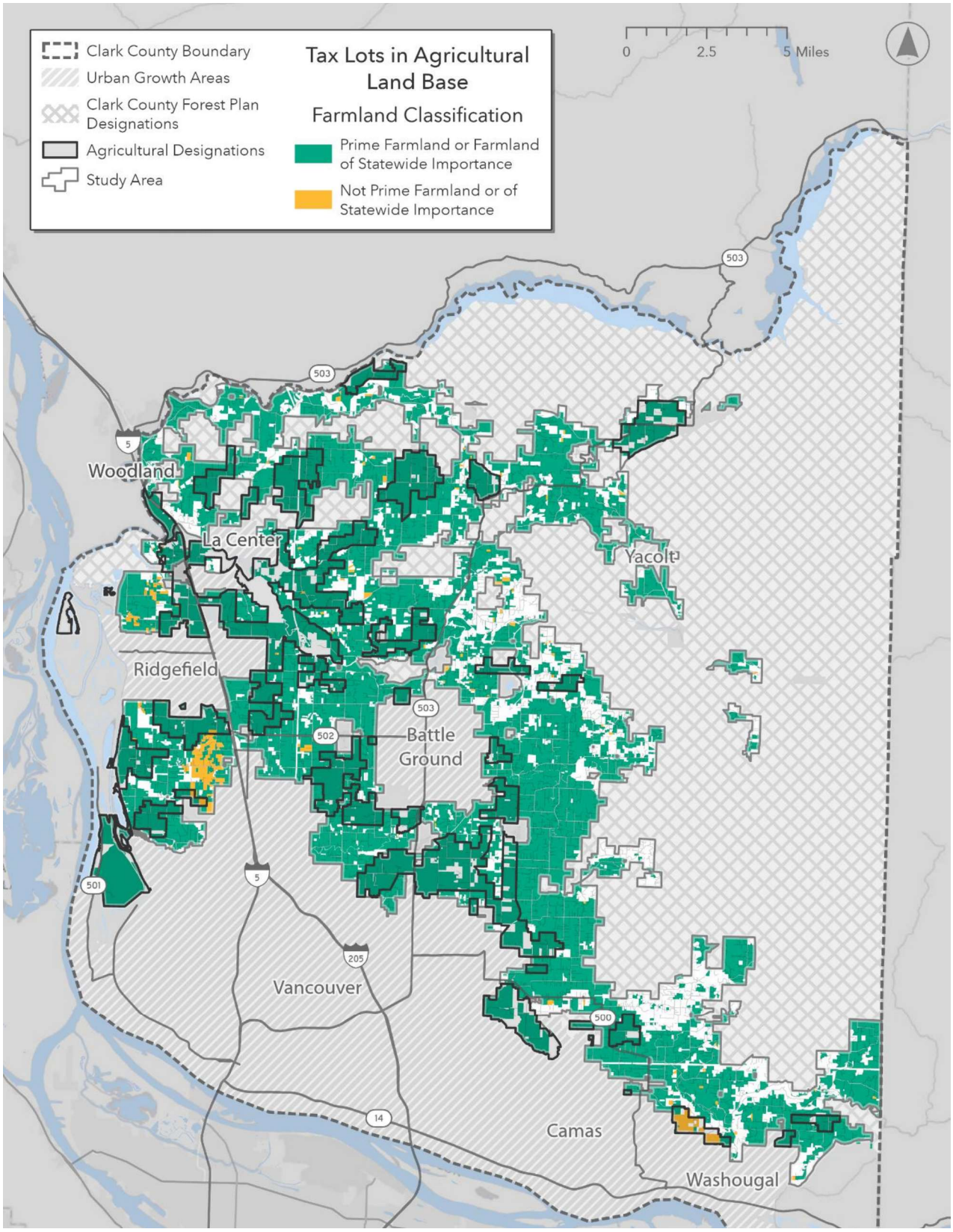
[34] Guirguis, Samira. "Community Supported Agriculture (CSA) in Washington: What is CSA and why is it important?" Washington State Department of Agriculture Blog. https://agr.wa.gov/about-wsda/blog-posts?article=42091.
[35] https://eatlocalfirst.org/wa-food-farm-finder/csa/

percent of the 101,844-acre Agricultural Land Base (99,900 acres) is classified as having Prime or Statewide Importance soils. A nearly identical share, 96 percent (31,400 acres), is found within the existing 32,589-acre Agricultural Designations. This near-universal prevalence indicates that from a soil-capability perspective, the vast majority of lands identified in the study area are physically well-suited for agricultural production. This can be seen spatially within the land base in Exhibit 31 and the agricultural designations in Exhibit 32.

Exhibit 30. Prime Farmland and Farmlands of Statewide Importance by Parcel Size

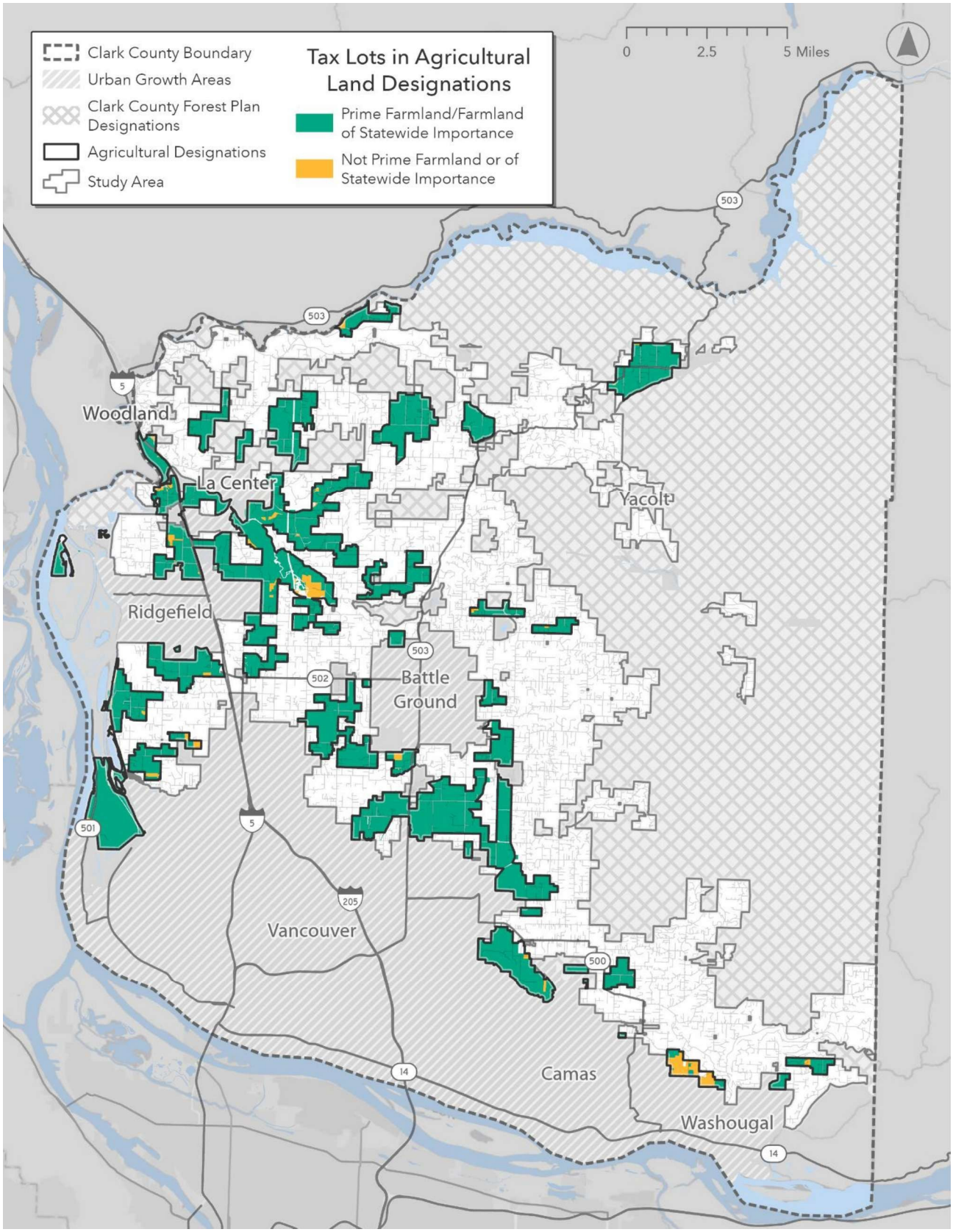
Parcel Size	# of Parcels	% of Parcels in Area	# of Acres	% of Acres in Area
In Agriculture Land Base	**18,109**	**98%**	**99,932**	**98%**
< 5	11,805	64%	31,381	31%
5 - 10	4,561	25%	28,620	28%
10 - 20	1,074	6%	15,564	15%
20 - 100	648	4%	20,632	20%
> 100	21	0.1%	3,735	4%
In Agriculture Designations	**2,519**	**96%**	**31,366**	**96%**
< 5	1,067	41%	2,913	9%
5 - 10	601	23%	4,004	12%
10 - 20	423	16%	6,802	21%
20 - 100	404	15%	13,370	41%
> 100	24	1%	4,278	13%

Exhibit 31. Prime Farmland and Farmlands of Statewide Importance within the Agricultural Land Base



Source: USDA NRCS (2024), Clark County (2025).

Exhibit 32. Prime Farmland and Farmlands of Statewide Importance within the Agricultural Land Designations



Source: USDA NRCS (2024), Clark County (2025)