From:	Cnty 2025 Comp Plan
To:	Garrett.West@jordanramis.com
Cc:	Oliver Orjiako; Rebecca Messinger
Subject:	FW: 2 of 3 New Record Submissions: Periodic Update (2026-S-14100 and 2026-S-14101)
Date:	Friday, October 2, 2026 1:49:00 PM
Attachments:	image001.png image002.png Ltr 2 of 2 to Clark County re GMA. 10.2.2026 FINAL (compressed).pdf image003.png image004.png image005.png image006.png

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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 12:33 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Cc: Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>
Subject: 2 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,

This is the second part of the letter I just sent you. It was too large to send in one email. A third email will follow with a separate letter.

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

Thank you,

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

JORDAN RAMIS

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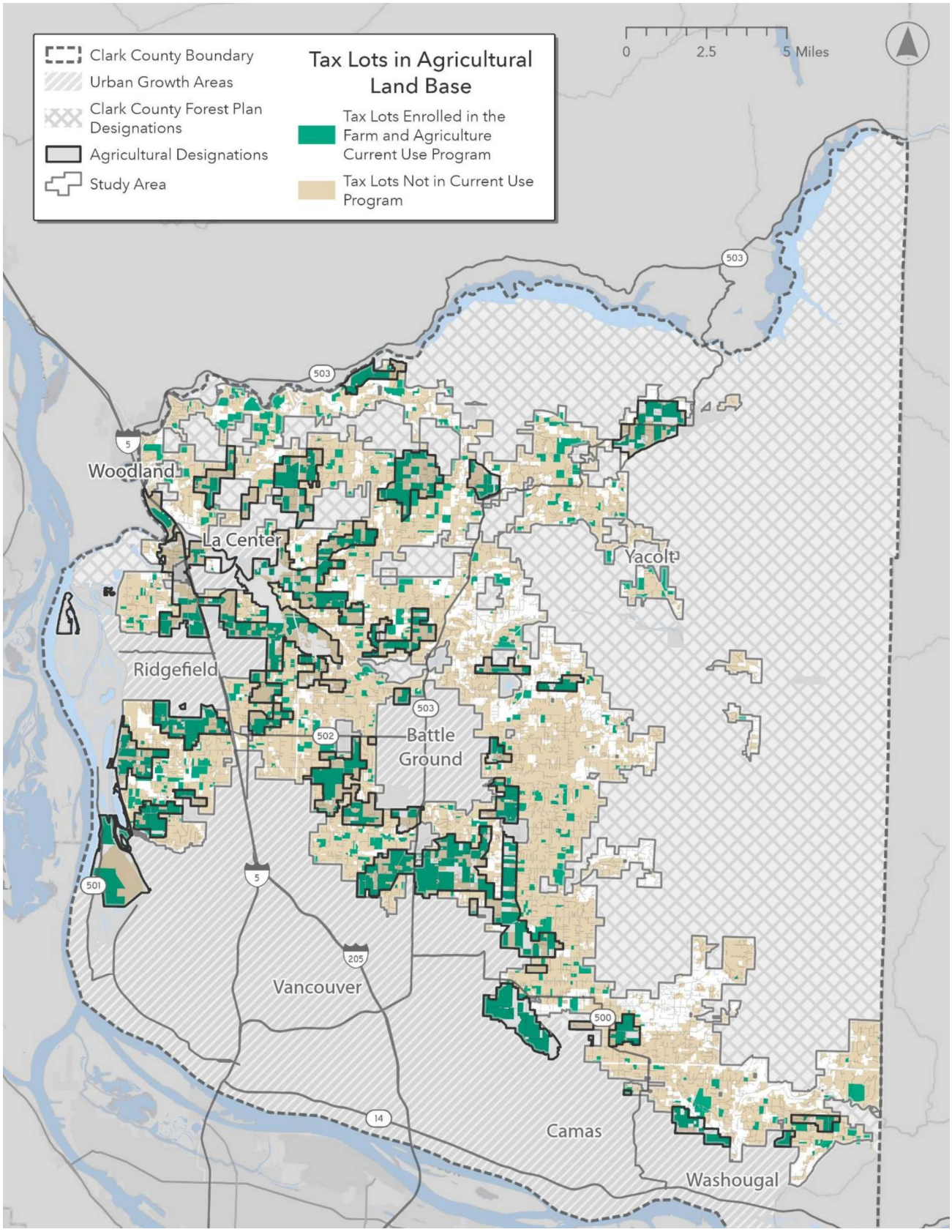
Enrollment in Clark County's Farm and Agriculture Current Use Program is a key indicator of a landowner's commitment to agricultural production, as it provides a tax incentive for active farming. The analysis (visualized in Exhibit 33) shows an association between this program and the existing Agricultural Designations. Within the designated lands, 55 percent of the acreage (18,000 acres) is enrolled in the program. This is more than double the rate found in the broader Agricultural Land Base, where only 25 percent of the acreage (26,000) is enrolled. This pattern holds true across most parcel sizes but is particularly pronounced in the 20 to 100 acre category. This suggests that the current designations correlate well with demonstrated farm investment and activity. These parcels can be seen mapped in the land base in Exhibit 34 and agricultural land designations in Exhibit 35.

Exhibit 33. Tax Lots within the Land Base Enrolled in Clark County's Farm and Agriculture Current Use Program

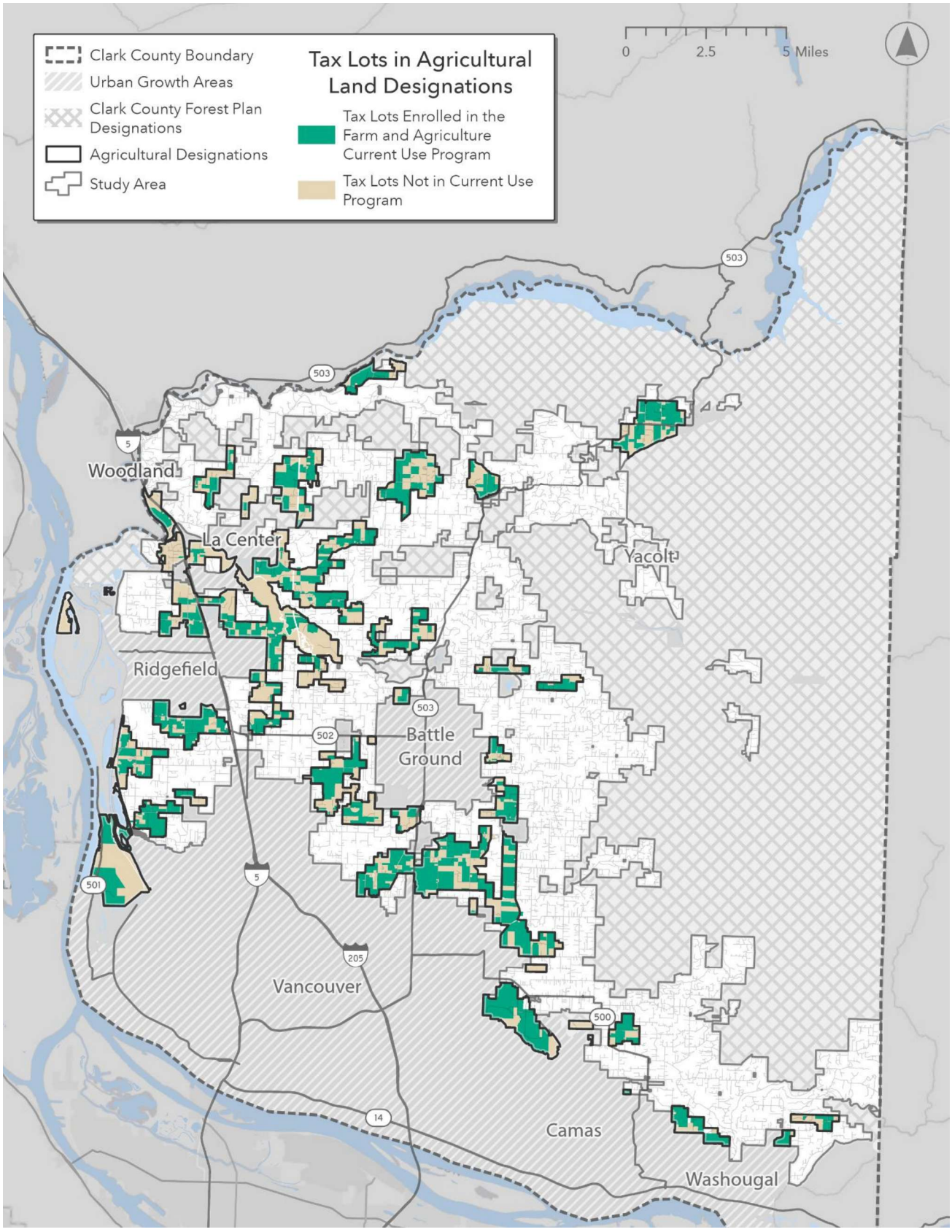
Parcel Size	# of Parcels	% of Total Parcels in Area	# of Acres	% of Total Acres in Area
In Agriculture Land Base	**1,608**	**9%**	**25,962**	**25%**
< 5	365	2%	1,484	1%
5 - 10	461	3%	3,248	3%
10 - 20	385	2%	6,106	6%
20 - 100	382	2%	12,371	12%
> 100	15	0%	2,752	3%
In Agriculture Designations	**829**	**32%**	**17,991**	**55%**
< 5	130	5%	503	2%
5 - 10	158	6%	1,167	4%
10 - 20	238	9%	3,969	12%
20 - 100	289	11%	9,741	30%
> 100	14	1%	2,610	8%

Exhibit 34. Tax Lots Within Land Base Enrolled in Clark County's Farm and Agriculture Current Use Program



Source: Clark County (2025)

Exhibit 35. Tax Lots Within Land Designations Enrolled in Clark County's Farm and Agriculture Current Use Program



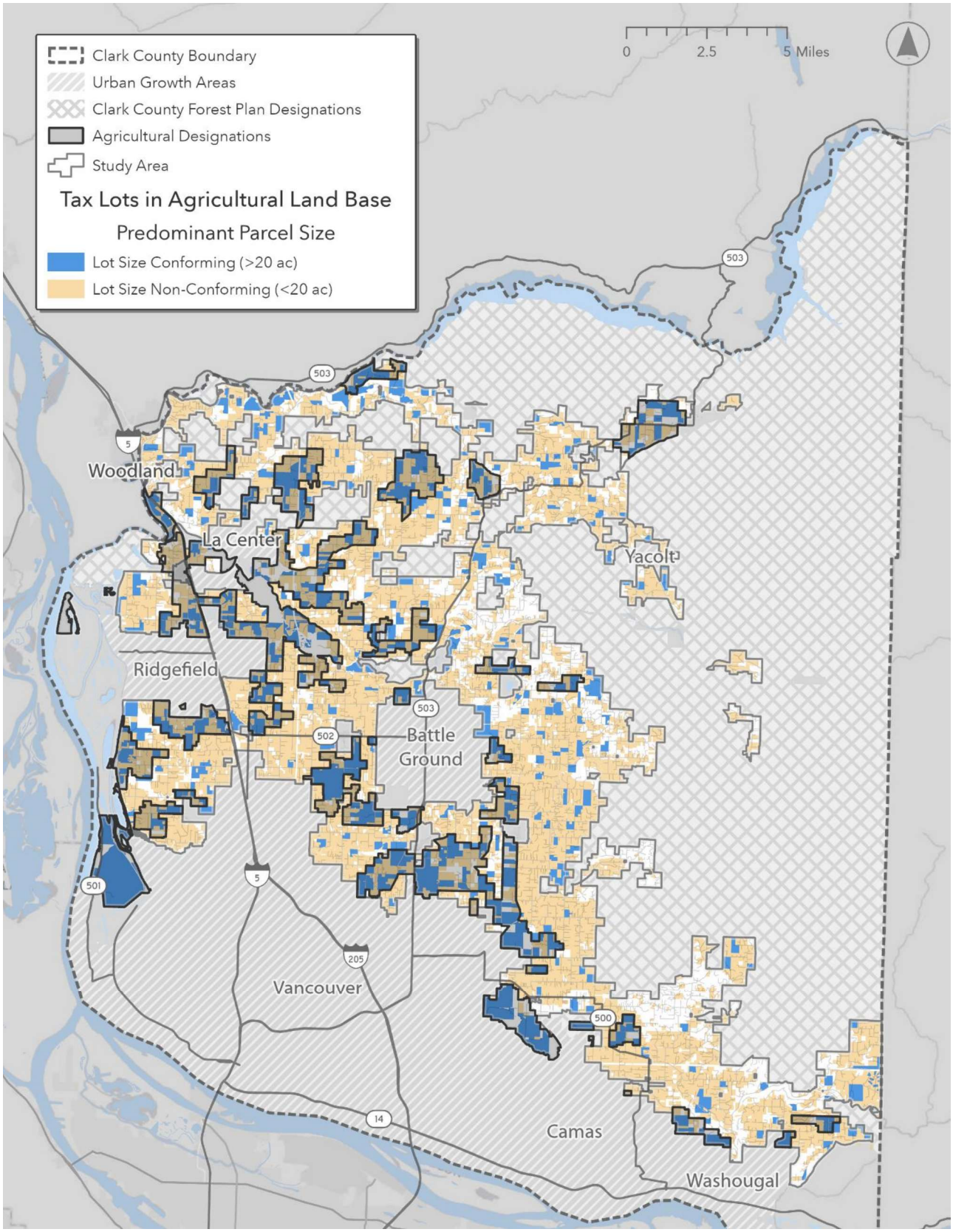
Source: Clark County (2024)

Predominant parcel size is a critical factor, as land fragmentation is a primary obstacle to the long-term viability of commercial agriculture. The data reveals the finding that the Agricultural Land Base is dominated by small, fragmented parcels. As detailed in Exhibit 36, 75 percent of the total acreage in the Land Base (76,900 acres) is in parcels smaller than 20 acres, the county's minimum lot size for the AG-20 zone. This fragmentation is less severe but still present within the current Agricultural Designations, where 44 percent of the acreage (14,200 acres) is in parcels smaller than 20 acres. Conversely, parcels 20 acres or larger, which are often better suited for commercial farming, make up a slim majority (56 percent) of the designated lands but only a minority (25 percent) of the broader Agricultural Land Base. This highlights that while the current designations have captured some areas with larger parcels, a significant portion of all agriculturally capable land is fragmented. Parcel sizes within the agricultural land base can be seen in Exhibit 37 and seen within only the land designations in Exhibit 38.

Exhibit 36. Predominant Parcel Sizes

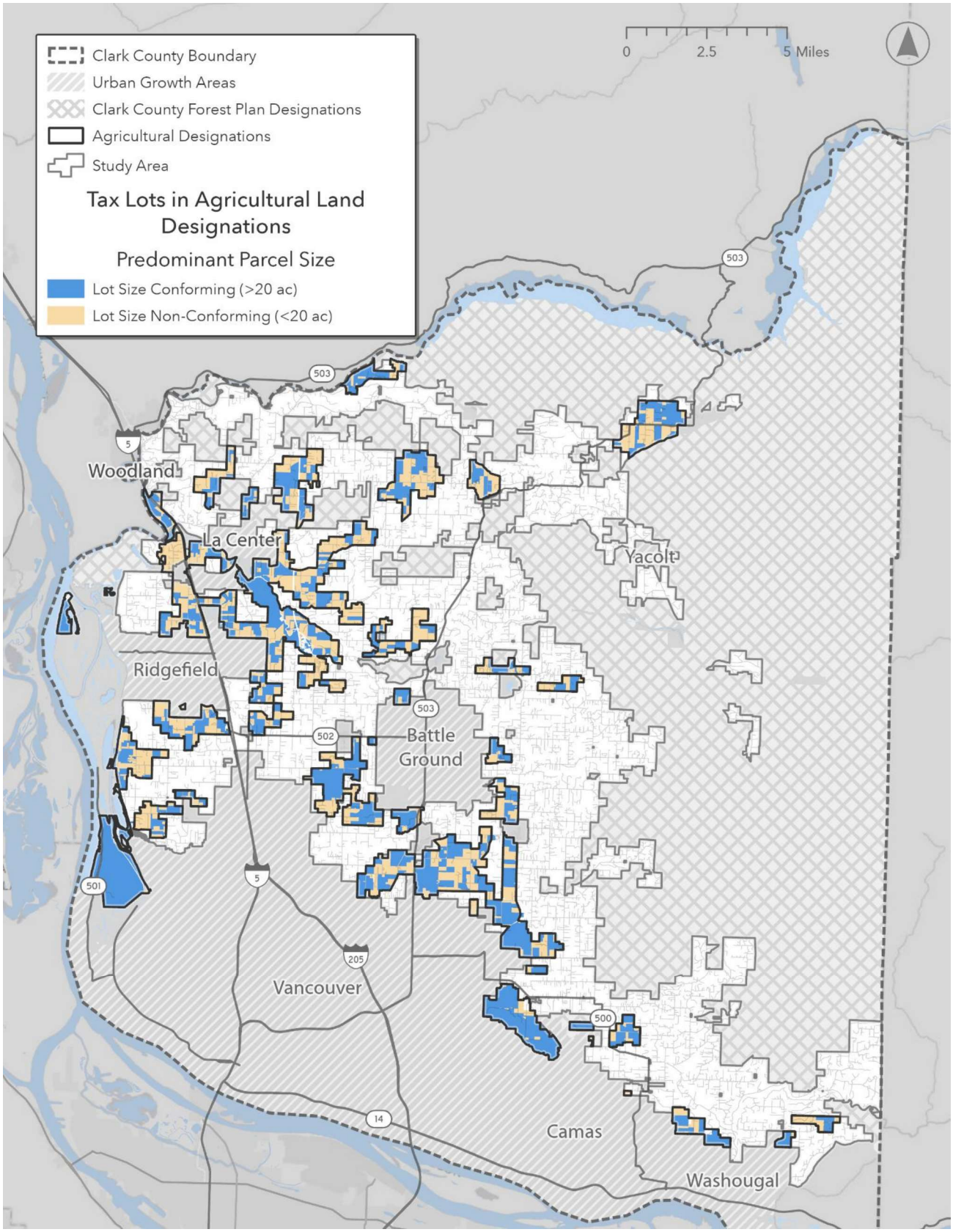
Predominant Parcel Size (acres)	# of Parcels	% of Parcels	# of Acres	% of Acres	Median Parcel Size
In Agriculture Land Base	**18,420**	**100%**	**101,844**	**100%**	**4.6**
Non-Conforming Parcels	**17,733**	**96%**	**76,871**	**75%**	**4.4**
< 5	11,996	65%	31,949	31%	2.5
5 - 10	4,648	25%	29,147	29%	5.4
10 - 20	1,089	6%	15,775	15%	13.8
Conforming Parcels	**687**	**4%**	**24,973**	**25%**	**27.7**
20 - 100	666	4%	21,239	21%	27.2
> 100	21	0%	3,735	4%	144.5
In Agriculture Designations	**2,625**	**100%**	**32,589**	**100%**	**5.1**
Non-Conforming Parcels	**2,172**	**83%**	**14,189**	**44%**	**5.0**
< 5	1,110	42%	3,018	9%	2.4
5 - 10	627	24%	4,172	13%	5.7
10 - 20	435	17%	6,999	21%	17.3
Conforming Parcels	**453**	**17%**	**18,400**	**56%**	**40.6**
20 - 100	429	16%	14,122	43%	27.8
> 100	24	1%	4,278	13%	157.5

Exhibit 37. Predominant Parcel Sizes in Agricultural Land Base



Source: Clark County (2025)

Exhibit 38. Predominant Parcel Sizes in Agricultural Land Designations



Source: Clark County (2025)

Taken together, this comparative analysis of the 101,844-acre Agricultural Land Base and the 32,589 acres in current Agricultural Designations reveals a distinct profile for each. While the physical capability for agriculture, defined by soil quality, is a near-universal asset across both areas, the two geographies differ significantly in prevailing land use patterns and demonstrated agricultural activity. These findings, based on the three primary indicators of long-term commercial significance and seen in Exhibit 39, can be summarized as follows:

- **High-quality soils are prevalent in both geographies:** 98 percent of the Agricultural Land Base (99,900 acres) and 96 percent of the Agricultural Designations (31,400 acres) are classified as Prime Farmland or Farmland of Statewide Importance.
- **The Agricultural Land Base is significantly more fragmented:** 75 percent of the Land Base (76,871 acres) consists of parcels smaller than 20 acres, compared to 44 percent (14,189 acres) of the current Agricultural Designations.
- **Enrollment in the Current Use Program is lower in the Land Base:** 25 percent of the Land Base (25,962 acres) is enrolled in the program, compared to a 55 percent enrollment rate (17,991 acres) within the Agricultural Designations.

Exhibit 39. Comparison of Agricultural Land Base and Plan Designations

WAC Criteria of Commercial Significance	# of Parcels	# of Acres	% Acres of Area
Agricultural Land Base (Totals)	**18,420**	**101,844**	
Soils			
Parcels with >= 50% Prime Farm or of Statewide Importance	18,108	99,932	98%
Tax Status			
Parcels Enrolled in Current Use Program	1,608	25,962	25%
Predominant Parcel Size			
Parcels less than 20 acres	17,733	76,871	75%
Parcels more than 20 acres	687	24,973	25%
Agricultural Designations (Totals)	**2,625**	**32,589**	
Soils			
Parcels with 50% or More Prime Farm or Farmlands of State Significance	2,519	31,366	96%
Tax Status			
Parcels Enrolled in Current Use Program	829	17,991	55%
Predominant Parcel Size			
Parcels less than 20 acres	2,172	14,189	44%
Parcels more than 20 acres	453	18,400	56%

Data Sources

Below is a comprehensive overview of all data that was specifically used for analysis. It does not include GIS layers that contributed only to cartographic elements (i.e. Hydrography, Clark County border).

Data Source	Layer
United States Geological Survey (USGS)	
	National Land Cover Database (NLCD)[36]
USDA NRCS Soil Survey Geography Database (SSURGO)[37]	
	Land Capability Classification
	National Commodity Crop Productivity Index (NCCPI)
	Soils Farmland Classification
USDA Natural Agricultural Statistics Service (NASS)	
	Cropland Data Layer (CDL)[38]
Washington State Department of Agriculture (WSDA)	
	Agricultural Land Use Layer[39]
Open Street Maps	
	Amenities (Healthcare)[40]
Clark County[41]	
	Building Permits[42]
	Fire Stations
	Roads
	Schools
	Tax Lots and Assessor Records (2003-2024)[43]
	Urban Growth Areas

[36] U.S. Geological Survey (USGS). 2024. Annual NLCD Collection 1 Science Products (ver. 1.1, June 2025) [Data release]. https://doi.org/10.5066/P94UXNTS. Accessed August 2025.
[37] 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/.
[38] USDA National Agricultural Statistics Service (NASS). 2024 Cropland Data Layer (CDL). Retrieved from the CropScape portal, https://nassgeodata.gmu.edu/CropScape/. Accessed August 2025.
[39] 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.
[40] Open Street Maps (OSM) https://wiki.openstreetmap.org/wiki/Key:amenity
[41] Clark County Digital GIS Data Bulk Download. https://hub-clarkcountywa.opendata.arcgis.com/pages/digital-gis-data-download
[42] Clark County, WA, GIS Department. "Building Permits" (2023–2024). Received upon request, September 19, 2025.
[43] Clark County, WA, Assessor and GIS. "GIS Tax Lots" (Tax Year 2024). Received via public records request from the Clark County Treasurer's Office, August 5, 2025.

Appendix A. Case Law Review

Washington's Growth Management Hearings Board (GMHB) has issued numerous decisions that interpret how counties must evaluate agricultural resource lands under the Growth Management Act. The following cases are particularly relevant to Clark County as it considers designation updates. The Board has consistently ruled that:

- Proper designation or de-designation of Agricultural Lands of Long-Term Commercial Significance (ALLTCS) uses the three-part test defined in *Lewis County v. WWGMHB (2006)*
- Countywide analysis is required; parcel-by-parcel based reviews undermine the GMA's intent (*Friends of Pierce County v. Pierce County*, 2016; *WAC 365-190-040(10)(c) and WAC 365-190-050(1) were amended in 2023 to require a countywide analysis*.

CITY OF REDMOND V. CENTRAL PUGET SOUND GMHB (1998)[44]

This landmark case established a critical principle for evaluating agricultural land. GMA defines agricultural land as "primarily devoted to the commercial production" of a large variety of farm products, and that has "long-term commercial significance" (LTCS) for agricultural production. In this case, the agriculturally zoned land in question had been purchased by investors for industrial and mixed-use development and had lain fallow for years. The Court held that land is devoted to agricultural use under GMA if it is in an area that is actually used or capable of being used for agricultural production. Neither the current use of the land nor the landowner's intent to develop it for nonagricultural purposes is conclusive as to whether it is "primarily devoted" to commercial ag production. Even if a property owner does not wish to farm, or finds it unprofitable, the land itself can still be farmed and can possess LTCS. This precedent prevents counties from de-designating viable farmland based on landowner preference or short-term market conditions.

LEWIS COUNTY V. WESTERN WASHINGTON GROWTH MANAGEMENT HEARINGS BOARD (2006)[45]

This foundational court case reached the Washington State Supreme Court after Lewis County failed four times to satisfy the Board that it had properly designated agricultural lands for conservation under the GMA. The Washington State Supreme Court decision established a three-part definition of agricultural lands, which states agricultural land is land:

a) not already be characterized by urban growth;

[44] City of Redmond v. Central Puget Sound Growth Mgmt. Hrgs. Bd., 136 Wn.2d 38, 979 P.2d 321 (1998). Available at https://case-law.vlex.com/vid/city-of-redmond-v-894094770

[45] Lewis County v. Western Washington Growth Mgmt. Hearings Bd., 157 Wn.2d 488, 139 P.3d 1096 (2006) . Available at https://law.justia.com/cases/washington/supreme-court/2006/76553-7-1.html

b) that is primarily devoted to the commercial production of agricultural products enumerated in RCW 36.70A.030(2), including land in areas used or capable of being used for production based on land characteristics;

c) that has long-term commercial significance for agricultural production, as indicated by soil, growing capacity, productivity, and whether it is near population areas or vulnerable to more intense uses.

The decision also provided support for local control and flexibility within the GMA, noting that "...the GMA does not dictate how much weight to assign each factor in determining which farmlands have long-term commercial significance." The decision is frequently cited by the Board to mandate that counties perform the three-part test.

KARPINSKI V. CLARK COUNTY (GMHB) (2008)[46]; CLARK COUNTY V. WWGMHB (COURT OF APPEALS) (2011)[47], CLARK COUNTY V. WWGMHB (SUPREME COURT0 (2013)[48].

This case clarified the legal standards for de-designating agricultural lands. Petitioners challenged Clark County's de-designation of 4,351 acres of designated agricultural resource lands and the addition of this acreage to Urban Growth Areas (UGAs). The decision by GMHB found that 11 of the de-designated areas were not characterized by urban growth and that the County's action violated the GMA. The decision was appealed to the Clark County Superior Court whose decision was appealed to the Court of Appeals. Not appealed to the Court of Appeals was the validity of the annexations of de-designated agricultural lands, but the Court addressed that question regardless, and struck down the annexations.

In 2013 the Washington Supreme Court granted review of the case in part, addressing only whether the Court of Appeals had correctly considered the issues that no party had appealed to it. The Supreme Court vacated the Court of Appeals holding that the annexations had been invalid and remanded the matter to the GMHB.[49]

On remand, the Board reversed its earlier decision that two of the areas the County had studied for de-designation were not characterized by urban growth. The Board also concluded that one of the areas under consideration did have long-term commercial significance for agricultural production following review of all WAC factors. In the remand decision, the board emphasized that designation and de-designation must be based on all the WAC 365-190-050 criteria, including physical capability for production and long-term commercial significance, not just market demand or development pressure.[50]

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[46] *Karpinski v. Clark County*, WWGMHB, Case No. 07-2-0027 (Amended Final Decision and Order, June 3, 2008). Available at https://clark.wa.gov/sites/default/files/dept/files/council-meetings/2014/PH_Washougal2.pdf

[47] Clark County v. WWGMHB, 161 Wn.App. 204, 254 P.3d 862 (2011). Available at https://www.casemine.com/judgement/us/5914af3cadd7b0493474bbc5/amp

[48] Clark County v. WWGMHB, 177 Wn.2d 136, 298 P.3d 704 (2013).

[49] Clark County v. WWGMHB, 177 Wn.2d 136, 298 P.3d 704,(2013). Available at https://case-law.vlex.com/vid/clark-cnty-wash-v-892217150

[50] *Karpinski v. Clark County*, WWGMHB, Case No. 07-2-0027 (Final Decision and Order on Remand, March 11, 2014). Available at https://clark.wa.gov/sites/default/files/dept/files/council-meetings/2014/PH_Washougal2.pdf

CLARK COUNTY CITIZENS UNITED, INC. V. CLARK COUNTY (WWGMHB) (2017)[51], CLARK COUNTY V. WWGMHB (COURT OF APPEALS) (2019)[52]

This case involved wide-ranging challenges to Clark County's 2016 Comprehensive Plan Update, including its approach to agricultural land de-designations and up-zoning. The Board concluded Clark County did not meet RCW 36.70A requirements on urban growth expansions, buildable lands, urban reserve overlays, agricultural land de-designations, up-zoning agriculture and forest resource lands, variety of rural densities, and industrial land banks. The Board imposed a finding of invalidity on several of the county's actions, including the de-designations of agricultural lands to allow urban growth expansions near La Center and Ridgefield.

In addition to Clark County Citizens United, Futurewise and Clark County appealed the GMHB's decision and in 2019 the case went before the Washington Court of Appeals. The court held that certain de-designations and UGA expansion challenges became moot once the lands had been incorporated into cities (Ridgefield and La Center). The court accepted Clark County's position that, once an area in dispute had been annexed, the County no longer had jurisdiction over that area, and so the County could not cure a violation of GMA regarding that area. Consequently, the County could no longer be challenged under GMA for the de-designations or the UGA expansions. Review of this decision was denied by the Washington Supreme Court in 2020, leaving a procedural pathway that allowed annexed lands to fall outside of the scope of the GMHB until the legislature added a new section of GMA in 2022.[53] New RCW 36.70A.067 provides that county decisions to de-designate or designate ag lands, or to add to urban growth boundaries are not effective until either the deadline has passed for a GMHB appeal, or if there is a GMHB appeal, until after the GMHB issues a final decision and order. A quick annexation, in other words, cannot occur because the land is not within the UGA; an attempt to annex would no longer immunize a county from an appeal regarding the annexed land.

Additionally, the GMHB ruled that a county must apply WAC criteria requiring area-wide or countywide analysis of how the de-designation would affect the viability of the agricultural industry in the county as a whole, striking down the County's attempt to de-designate agricultural land for a rural industrial bank. The GMHB also ruled that the County's attempt at reducing agricultural minimum lot sizes to 10 acres had violated the GMA. The Court of Appeals upheld those rulings.

BUCHANAN FARMS AND RANDY BUCHANAN V. WALLA WALLA COUNTY (2018)[54]

Petitioners challenged Walla Walla County's ordinance adopting a site-specific comprehensive plan and zoning map amendment. The ordinance de-designated a 160-acre property from agricultural lands of long-term commercial significance (ALLTCS) to Industrial

[51] *Clark County Citizens United, Inc. v. Clark County*, WWGMHB Case No. 16-2-0005c (Final Decision and Order, March 23, 2017). Available at https://clark.wa.gov/sites/default/files/dept/files/council-meetings/2017-Q1-Q2/032917WS_Clark_FDO_Final.pdf
[52] *Clark County v. WWGMHB,* 10 Wn.App. 2d 84, 448 P3d 81 (2019).
[53] Washington State Legislature, RCW 36.70A.067, https://app.leg.wa.gov/RCW/default.aspx?cite=36.70A.067
[54] *Buchanan Farms v. Walla Walla County*, EWGMHB Case No. 18-1-0001 (Final Decision and Order, July 2, 2018)

Agriculture and added it to the Attalia Industrial Urban Growth Area (UGA), while also removing another 160-acre property from the same UGA and changing its zoning from Industrial Agriculture to ALLTCS. The Board found Walla Walla County compliant with GMA criteria because the lands swap was conducted under a county-wide process and there was no net loss of acreage designated as ALLTCS. In 2024, the Washington Legislature amended RCW 36.70A.110 to add a new subsection specifically authorizing UGA changes and de-designations made by land swaps, subject to numerous requirements that had not been considered in *Buchanan Farms*.

KITSAP ALLIANCE OF PROPERTY OWNERS ET AL. V. KITSAP COUNTY (2025)

Petitioners challenged Kitsap County's 2024 periodic update of its Comprehensive Plan, which included failure to adopt criteria for designation of ALLTCS after amendments to WAC 365-190-040(10)(c) and WAC 365-190-050(1) criteria. The Board found Kitsap County had not violated the GMA criteria, noting their designations mirror the state's.[55] This case illustrates that aligning local criteria directly with updated state standards is legally permissible, even when the result is no net change in agricultural land area.

SUMMARY OF LEGAL PRECEDENTS

These legal cases provide additional interpretations of the requirements for how counties must manage agricultural lands under the Growth Management Act (GMA). A primary theme is the requirement for a systematic, criteria-driven analysis when designating or de-designating land. The Growth Management Hearings Board (GMHB) and the appellate courts have repeatedly rejected de-designation decisions based on plans for future management, development pressure, land values, or mere proximity to development. Instead, counties must ground their decisions in the physical and geographical characteristics that determine long-term commercial significance, such as soil types. Furthermore, these cases affirm that analysis must be conducted from a county-wide perspective, as parcel-by-parcel reviews are insufficient to meet the GMA's requirements.

The decisions also highlight the critical importance of procedural integrity and internal consistency. Once land is designated for agricultural use, it cannot be de-designated without a formal and well-documented process. Similarly, all zoning actions must align with the county's own adopted Comprehensive Plan policies to be legally defensible. Ultimately, the cases demonstrate that a legally resilient agricultural lands program is one that maintains a clear analytical record, applies the WAC criteria consistently, and ensures that any changes, are part of a transparent, county-wide strategy that upholds the GMA's core goal of resource lands conservation, maintenance, protection, and enhancement.

[55] Washington State Growth Management Hearings Board, Case No. 25-3-0005c, (Final Decision and Order, August 8, 2025).

Appendix B. Comparison Review of Agricultural Land Study from Peer Counties

Evaluating agricultural land for its long-term commercial significance is a complex but critical task for counties planning under Washington's Growth Management Act (GMA). The Washington Administrative Code (WAC) provides a framework of criteria for this evaluation, but the specific application of these criteria varies significantly from one county to another. This variation reflects the diverse agricultural landscapes, development pressures, and policy priorities across the state.

This analysis provides a comparative review of the methodologies to assess agricultural resource lands used by six Washington counties. The purpose of this review was to understand the different approaches other counties have taken, that range from purely qualitative assessments to complex quantitative scoring systems. We also identify the metrics and best practices each has developed. By examining how these counties interpret and operationalize state guidelines, insights can be gained to inform the development of a robust and legally defensible methodology for the forthcoming Clark County agricultural resource lands study.

SUMMARY OF PEER COUNTY METHODOLOGIES

A review of six counties reveals a range of approaches to evaluating agricultural lands and interpreting the relevant statutory and administrative code language. These are summarized in the matrix below. The methods range from primarily qualitative to quantitative systems that use weighting and scoring. The narrative that follows describes each county's methodology in more detail.

COUNTY (YEAR)	METHODOLOGY	STATED PURPOSE
Benton (2018)	**Hybrid:** Combined quantitative data and thresholds with qualitative assessments; no formal scoring.	To analyze the county's agricultural lands using a clear set of criteria and based on the findings, recommend specific changes to the official agricultural land designations.
Pierce (2016)	**Qualitative:** An analysis of the effectiveness of the county's existing (and largely quantitative) criteria.	To evaluate how well Pierce County's current rules are working to protect its farmland. The specific purpose of this document is to support that evaluation by researching and comparing the methods that other Washington counties use to designate their own agricultural lands.

COUNTY (YEAR)	METHODOLOGY	STATED PURPOSE
San Juan (2020)	**Quantitative:** Used a weighted scoring system (LCSI) to evaluate every parcel against a set of criteria.	To outline the proposed method for reviewing the county's natural resource lands and to show, with a preliminary analysis, how that method would work in practice.
Thurston (2014)	**Qualitative:** Established descriptive criteria and quantitative thresholds without a numerical scoring system.	To preserve a sufficient amount of agricultural land for long-term farming by conserving prime farmlands, supporting local markets, and preventing conflicts with incompatible land uses.
Whatcom (2021)	**Qualitative:** Relied on a list of nonexclusive criteria considered on an areawide basis.	To preserve Whatcom County's agricultural industry and its cultural heritage for the future. A key goal is to ensure the long-term economic viability of farming by maintaining at least 100,000 acres of designated agricultural land.
Yakima (2017)	**Hybrid:** Combined a quantitative scoring system for key factors with a qualitative impact assessment for others.	To preserve and stabilize the county's agricultural land base to ensure its continued productivity. The overarching goal is to maintain and enhance these farmlands while discouraging incompatible development that could interfere with farming.

San Juan and Yakima counties represent the most quantitative end of the spectrum, employing numerical scoring systems that assign weighted points to parcels based on specific WAC criteria. This approach produces a transparent, data-driven, and legally defensible index of long-term commercial significance. At the other end, Whatcom and Thurston counties use a more qualitative, policy-based framework, relying on descriptive criteria to guide designation decisions. In the middle are hybrid models, used by Benton and Clark counties, which ground their analysis in extensive quantitative data (such as precipitation levels, soil classifications, and traffic counts) but present the findings within a descriptive, non-scored matrix, leaving the final balancing of factors to policymakers.

Counties showed strong alignment on several core WAC criteria. The use of NRCS soil data as the foundation for assessing soil quality is nearly universal, as is the principle that designated agricultural lands should be located outside of Urban Growth Areas. This is not surprising, the WAC clearly require the use of NRCS soil data in the evaluations. Most

counties also consider enrollment in current use taxation programs a key indicator of agricultural activity. However, significant divergence exists in the application of other criteria. Parcel size thresholds vary widely, from five acres in Pierce County to twenty acres in Thurston, while others use a sliding scale. The methods for evaluating land use patterns and development pressure also differ, with some counties using qualitative descriptions and others attempting to quantify these factors through metrics like the average size of adjacent parcels or the number of nearby development permits. Furthermore, many counties have developed unique, locally specific criteria, such as Benton County's focus on water availability and American Viticultural Areas, demonstrating how the WAC framework is adapted to diverse local agricultural contexts.

Across the different methodologies, several common data points and elements were used to operationalize the WAC criteria. For soil quality, NRCS prime farmland classifications and Land Capability Classes were the standard metrics. To assess development pressure and compatibility, counties frequently analyzed the availability of public facilities like urban water and sewer, the proximity and quality of public roads, and the number of recent land development or subdivision permits. Enrollment in current use tax programs under RCW 84.34 was the most common element for evaluating tax status. Finally, while specific thresholds varied, parcel acreage was a fundamental metric used by all counties to assess the scale and potential viability of agricultural operations.

The final outputs of these county studies varied in their purpose and scope. Some analyses, like Benton County's, resulted in direct recommendations for designation changes, proposing the addition and removal of specific acreages. Others, such as the Pierce County study, functioned as a critique of existing policy, concluding that the county's criteria were legally compliant but ineffective and recommending a shift to a new, district-based approach. Some counties, including San Juan and Yakima, produced neutral inventories or analytical frameworks. San Juan and Yakima counties developed formal, data-driven processes—the Long-Term Commercial Significance Index and the Agricultural Resource De-designation Analytical Process, respectively—to guide future, case-by-case designation decisions rather than making them within the studies themselves.

This comparative review demonstrates that while all counties operate under the same state-level GMA framework, the practical application of that framework is highly varied and tailored to local conditions. These diverse approaches, from quantitative scoring to qualitative policy analysis, provide a valuable toolkit of best practices and proven metrics. The insights gained from this peer comparison will directly inform the development of a robust, transparent, and legally defensible methodology for the forthcoming Clark County agricultural lands study.

BENTON COUNTY (2018)

Benton County undertook a county-wide review of its designated agricultural resource lands as part of the 2017 Comprehensive Plan update.[56] The last such review had been many years earlier. This reclassification effort aimed to ensure all relevant designation factors were addressed and to recommend changes to agricultural resource land boundaries.

Benton County's analysis of long-term commercial significance under WAC 365-190-050(3)(c) was a hybrid model, combining quantitative data and thresholds with qualitative assessments. The county did not use a formal scoring system but instead evaluated lands against a set of state and locally-developed criteria.

- **Soil Quality:** The analysis identified prime farmlands, farmlands of statewide importance, and unique important farmlands using NRCS data. This was cross-checked with data on irrigated versus non-irrigated lands to assess production capability.
- **Public Facilities and Services:** The county considered the availability of public facilities and services qualitatively. Areas with urban water and sewer systems and a dense network of public roads were considered for removal from agricultural designation, as these services support more intense development.
- **Tax Status:** The analysis noted that the tax status of lands considered for removal was unremarkable, including categories such as residential vacant lots, dry agricultural land, and pasture.
- **Proximity to Urban Growth Areas, Settlement Patterns, and Land Use Intensity:** These factors were considered together. Marginal agricultural lands adjacent to developing areas, especially those experiencing rising land values and recent urban settlement patterns, were considered for reclassification.
- **Parcel Size:** A quantitative threshold of 10 acres was generally used to identify commercially significant parcels, although exceptions were acknowledged for high-value crops like vineyards that can be viable on smaller lots.
- **Development History:** The county considered the history of nearby land development permits as an indicator of development pressure.
- **Proximity to Markets:** This factor was not found to be a limiting constraint, as most areas in the county have sufficient market access.
- **County-Specific Factors:** Benton County added several criteria tailored to its unique agricultural environment. The most significant was water availability, establishing a quantitative threshold that dryland farming areas receiving less than 6.5 inches of annual precipitation were not commercially viable long-term. The county also considered enrollment in the Conservation Reserve Program (CRP), local pesticide

[56] Benton County. *Appendix L. Agricultural Land Reclassification Memorandum (2018)*. January 1, 2018. https://bentoncountywa.municipalone.com/files/documents/FinalCPAppendixLFeb20181290455490207 18PM.pdf.

restrictions, and the presence of federally recognized American Viticultural Areas (AVAs) as lands of local importance.

The analysis resulted in the proposed addition of approximately 6,051 acres to the agricultural resource land designation and the removal of 4,565 acres. This produced a net increase of about 1,500 acres, supplemented by the creation of a new "Rural Resource" land designation covering 7,130 acres to further conserve agricultural and rangeland uses.

PIERCE COUNTY (2016)

As part of a project titled "A Fresh Look at Pierce County Agriculture," the county undertook a review of its designated Agricultural Resource Lands (ARL) in 2016.[57,58] This effort was not a new county-wide land analysis but rather an evaluation of the effectiveness of the county's existing ARL designation criteria.

The Pierce County review was a qualitative analysis of its existing, largely quantitative ARL criteria. The consultant team evaluated whether the criteria were legally compliant, effective at protecting viable farmland, and aligned with the realities of local agriculture. The county's existing criteria for long-term commercial significance were:

- **Soil Quality:** The criterion required that a parcel contain 50% or more "prime farmland" soils. The review found this to be legally sound but noted that the 50% threshold could be too restrictive for large farms and that some agricultural uses (like greenhouses) are not soil-dependent.
- **Proximity to Urban Growth Areas:** The criterion required that land be located outside Urban Growth Areas (UGAs). This was found to meet GMA standards.
- **Parcel Size:** The criterion set a minimum parcel size of five acres. The review questioned whether this threshold was too small to ensure commercial viability on its own.
- **Land Use Patterns and Intensity:** The criterion required that 50% of abutting parcels be larger than one acre. The review found this standard to be legally compliant but viewed the one-acre threshold as arbitrary and too small to effectively define a surrounding agricultural context.
- **County-Specific Factors:** Pierce County used two additional criteria. The first was a grass/legume production yield of 3.5 tons or more per acre, which the review found to be outdated, arbitrary, and not reflective of the county's dominant crops. The second allowed for landowner-requested designation, which was supported by stakeholders but not widely known among property owners.

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[57] E2 Land Use Planning, LLC. *Technical Memorandum #3 – ARL Designation Criteria in Selected Counties*, in *A Fresh Look at Pierce County Agriculture*. May 17, 2016. https://www.piercecountywa.gov/DocumentCenter/View/44326/ARL-Tech-Memo-3-ARL_Designation_Criteria-_Final?bidId=.

[58] E2 Land Use Planning, LLC. *Technical Memorandum #2 – Review of Washington Growth Management Hearings Board Decisions*, in *A Fresh Look at Pierce County Agriculture*. June 7, 2016. http://www.freshlookatpierceag.org/wordpress/wp-content/uploads/2016/09/Tech_Memo_-2-Review_of_Washington_Growth_Management_Hearings_Board_Decisions-_060716-BW-edit.pdf.

The review concluded that while Pierce County's existing criteria were legally compliant, they were not effective, resulting in a scattered "shotgun" pattern of ARL designation rather than protecting large, contiguous blocks of farmland. The primary recommendation was to abandon the one-size-fits-all approach and adopt district-specific criteria tailored to the county's different agricultural areas. Key proposed changes included increasing minimum parcel sizes, modifying the prime soils rule, eliminating the grass/legume yield criterion, and strengthening the abutting parcel size requirement.

SAN JUAN COUNTY (2020)

San Juan County developed a methodology for reviewing its natural resource land designations as part of its 2020 Comprehensive Plan update.[59] This reclassification effort aimed to ensure consistency with state and local criteria and to create a transparent, data-driven process for future designation decisions.

San Juan County's methodology is a highly quantitative, multi-phased process centered on a scoring system called the Long-Term Commercial Significance Index (LCSI). This system evaluates every parcel in the county against a weighted set of criteria derived from WAC 365-190-050(3)(c) to produce a final score out of a maximum of 50 points.

- **Soil Quality:** This criterion is based on the percentage of a parcel classified as prime farmland by the NRCS. It is weighted most heavily (2x). A parcel with more than 75% prime farmland receives a factor score of 4 (for a total of 8 points), while a parcel with no prime farmland scores 0.
- **Public Facilities:** This criterion measures proximity to public roads. It is weighted least heavily (1x). A parcel adjacent to a public road scores 4, while one more than 1,000 feet away scores 0.
- **Tax Status:** This criterion scores parcels based on enrollment in the current use farm and agriculture program or the open-space farm conservation program. It is weighted medium-high (1.5x). A parcel in the current use program scores 4.
- **Public Services:** This criterion scores parcels based on their location relative to community water and sewer system service areas. It is weighted least heavily (1x). A parcel outside both systems scores 4, while a parcel inside both scores 0.
- **Proximity to Urban Growth Areas:** This criterion measures distance from a UGA. It is weighted least heavily (1x). A parcel more than a half-mile away scores 4, while one within a quarter-mile scores 0.
- **Parcel Size:** This criterion is based on acreage and is weighted most heavily (2x). A parcel larger than 20 acres scores 4, while a parcel less than 2 acres scores 0.

[59] San Juan County. *San Juan County Comprehensive Plan Element B.2 Land Use and Rural Natural Resource Land Review Methodology*. October 12, 2020. https://www.sanjuancountywa.gov/DocumentCenter/View/21233/October-12-2020-Staff-Memo-Natural-Resource-Lands-Designation-Review.

- **Land Use Settlement Patterns:** This criterion is uniquely quantified by the average size of adjacent parcels. It is weighted medium-low (1.25x). If the average adjacent parcel is 20 acres or larger, it scores 4; if less than 2 acres, it scores 0.
- **Intensity of Nearby Land Uses:** This criterion is quantified using the Assessor's use code of neighboring parcels. It is weighted medium-low (1.25x). If a neighboring parcel has an agricultural or open space code, it scores 4.
- **Proximity to Markets:** This criterion is uniquely quantified by island location to reflect market access via the ferry system. It is weighted medium-high (1.5x). A parcel on San Juan, Lopez, or Orcas scores 4, while a parcel on a non-ferry-served island scores 0.

The county's methodology is a four-phase process. Phase One calculates the LCSI for every parcel. Phase Two compares these GMA-based scores with the county's local Comprehensive Plan criteria to identify parcels that may be candidates for designation or de-designation. Phases Three and Four involve public input and a final, in-depth analysis to produce recommendations. The findings of this process are the LCSI scores themselves, which provide a transparent and legally defensible foundation for all subsequent designation decisions.

THURSTON COUNTY (2014)

Thurston County established criteria to designate agricultural land of long-term commercial significance as part of its Comprehensive Plan.[60] This effort aimed to conserve prime farmlands, promote local markets, and minimize incompatible land uses in a growing county.

Thurston County's approach to evaluating long-term commercial significance under WAC 365-190-050 was primarily qualitative, establishing a set of descriptive criteria and quantitative thresholds against which agricultural areas were assessed. The county did not use a numerical scoring system but instead applied these criteria to identify and designate appropriate areas on its official maps.

- **Soil Quality:** The analysis was based on the land capability classification system from the USDA. The county identified a specific list of prime farmland soil types from the 1990 Soil Conservation Service's Soil Survey of Thurston County. The guiding policy was that designated lands should include "predominantly prime farmland soils."
- **Public Facilities and Services:** This was assessed based on a parcel's location relative to Urban Growth Areas (UGAs). The criterion states that because lands within UGAs are intended to be served by public facilities and services, designated agricultural lands should be located outside of UGA boundaries.

[60] Thurston County. *Chapter Three – Natural Resource Lands, in Thurston County Comprehensive Plan*. Revised January 2014. https://farmlandinfo.org/wp-content/uploads/sites/2/2019/09/Thurston_Co_WA_comprehensive_plan_excerpt_1.pdf.

- **Tax Status:** The county considered enrollment in the open space tax program as one indicator, alongside historic and current use information, to help identify lands capable of being used for agriculture.
- **Proximity to Urban Growth Areas:** This criterion required designated agricultural lands to be located outside of UGAs. It further specified that these lands should be separated from urban residential densities by a natural or man-made feature like a road or river to avoid land use conflicts.
- **Parcel Size:** The county established a quantitative threshold, stating that the "predominant parcel size is 20 acres or more," which, in conjunction with soil type, was determined to be sufficient for long-term commercial production.
- **Land Use Settlement Patterns and Intensity of Nearby Land Uses:** These factors were considered together. The criteria specified that adjacent residential development should be minimal and at rural densities of one unit per five acres. Recent subdivision activity was noted as an indicator of settlement patterns that could affect long-term viability. Compatible adjacent uses were identified as forestry, mining, and parks.
- **Proximity to Markets:** The criteria required that local or regional markets be available and that designated lands have access to transportation routes.
- **County-Specific Factors:** Thurston County added two unique criteria. The first, Agricultural Diversity, established a minimum size for any single designated agricultural area at 320 acres (or 200 acres if near another designated area) to ensure land use compatibility and support a diversity of uses. The second, Environmental Considerations, stated that designated lands should be outside of Natural Shoreline Environments if not already in agricultural use, due to regulatory limitations on converting such areas.

The county's analysis resulted in the designation of several areas of long-term agricultural significance, which are shown on its official map (Map M-42). The process gave special consideration to the unique agricultural and scenic values of the Nisqually Valley. The criteria also established a high bar for the piecemeal redesignation of designated lands, requiring that such re-evaluations only occur for whole areas and only in response to significant, long-term changes in economic, land use, or regulatory conditions.

WHATCOM COUNTY (2021)

Whatcom County established its criteria for designating agricultural lands of long-term commercial significance through the work of an Agricultural Resource Land Advisory Committee as part of its Comprehensive Plan.[61] The goal was to preserve the county's agricultural base and ensure the industry remains a vital part of the local economy and cultural heritage.

[61] Whatcom County. *Chapter 8 – Resource Lands,* in *Whatcom County Comprehensive Plan.* August 3, 2021. https://www.whatcomcounty.us/DocumentCenter/View/24082/Chapter-8-resource-lands?bidId=.

Whatcom County's methodology is primarily qualitative and policy based. It does not use a numerical scoring system but instead lists a set of thirteen nonexclusive criteria in its Comprehensive Plan (Policy 8A-3) to be considered on an areawide basis when designating or de-designating agricultural lands. The overarching goal is to designate enough land to maintain the economic viability of the agricultural industry.

- **Soil Quality:** The analysis uses two NRCS systems. The first is the Prime Farmland classification system, which identifies several categories of prime soils (e.g., "prime farmland if drained," "prime farmland if irrigated"). The second is the Land Evaluation and Site Assessment (LESA) system. A key local policy is that a majority of a designated area should contain Prime Farmland Soils. The county also uses an "Agriculture Protection Overlay" (APO) that applies to certain rural lands containing more than 50% APO-classified soils.
- **Public Facilities and Services**: The county considers the availability of public facilities, such as roads used for transporting agricultural products, and public services as factors in its qualitative assessment.
- **Tax Status:** The analysis includes whether an area contains a predominance of parcels that have a current use tax assessment under the Open Space Taxation Act.
- **Proximity to Urban Growth Areas:** The proximity of an area to UGAs is a consideration in the designation process.
- **Parcel Size:** The predominant parcel size in an area must be large enough to adequately maintain agricultural operations.
- **Land Use Settlement Patterns and Intensity of Nearby Land Uses:** These factors are assessed together to determine if existing patterns and uses are generally compatible with agricultural practices.
- **Development History:** The history of approved land development permits is considered as part of the compatibility assessment.
- **Alternative Land Uses:** The analysis considers land value under alternative uses as a factor.
- **Proximity to Markets:** An area's proximity to agricultural markets is a criterion for designation.
- **County-Specific Factors:** Whatcom County's criteria also include several locally specific qualitative factors: whether the area contains 100-year floodplains; whether a majority of the area was historically in agriculture prior to 1985; the existence of special purpose districts (e.g., drainage, flood control) that enhance agriculture; and evidence of landowner capital investment in agricultural improvements like irrigation, drainage, and buildings.

The county's analysis and policies are driven by a goal to maintain a minimum of 100,000 acres of land available for agricultural use, which is considered the amount necessary to support a viable agricultural industry. The policies also established the Agriculture Protection Overlay (APO) as a tool to conserve important agricultural soils located outside of

the primary agricultural zone by using cluster zoning to preserve open space at the time of subdivision.

YAKIMA COUNTY (2017)

Yakima County developed a detailed methodology to guide the potential reclassification of its designated agricultural resource lands as part of its Horizon 2040 Comprehensive Plan.[62] The process was designed to be a transparent, data-driven framework for making area-wide decisions about land use changes.

Yakima County's "Agricultural Resource De-designation Analytical Process" is a formal, multi-step hybrid model that combines a quantitative scoring system for key criteria with a qualitative impact assessment for others. This process is applied on an area-wide basis to determine if a land use designation should be changed from Agricultural Resource to another category.

Quantitative Analysis

The county's process begins with a quantitative analysis of three of the ten WAC 365-190-050 criteria, assigning points on a 0-4 scale for each.

- **Soil Quality:** This analysis is based on expected crop yield data from the 1985 Soil Survey of Yakima County. The county first identifies soils suitable for its key crops (e.g., tree fruits, row crops), including those on slopes up to 15 degrees that are viable for orchards and vineyards. These soils are then ranked by anticipated yield into five equal categories and assigned points. For tree fruit soils, the point breaks are as follows:
  - 0 points: 330–464 bu/ac
  - 1 point: 465–598 bu/ac
  - 2 points: 599–732 bu/ac
  - 3 points: 733–886 bu/ac
  - 4 points: 867–1000 bu/ac
- **Proximity to Urban Growth Areas:** Parcels are scored based on their distance from a UGA boundary, with lands farther from urban influence receiving more points.
  - 0 points: Within ¼ mile of the UGA
  - 1 point: Between ¼ and ½ mile
  - 2 points: Between ½ mile and 1 mile
  - 3 points: Between 1 and 2 miles
  - 4 points: Greater than 2 miles

[62] Yakima County. *Land Use Element,* in *Horizon 2040 Comprehensive Plan.* Updated June 2017. https://www.yakimacounty.us/DocumentCenter/View/15342/CHAPTER_5_Land-Use.

- **Parcel Size:** Larger parcels are considered more suitable for commercial agriculture and receive higher scores.
    - 0 points: Less than 5 acres
    - 1 point: Between 5 and 10 acres
    - 2 points: Between 10 and 20 acres
    - 3 points: Between 20 and 40 acres
    - 4 points: Greater than 40 acres

Qualitative Analysis

The remaining seven WAC criteria are evaluated to determine if they create an adverse impact on the viability of commercial agriculture in the study area. While described as qualitative, several of these criteria use quantitative thresholds to determine if an impact exists ("Yes" or "No").

- **Availability of Public Facilities:** An impact is considered to exist if public facilities (water, sewer, or paved roads) are within 1,000 feet of the majority of parcels in the study area.
- **Tax Status:** An impact is considered to exist if the majority of parcels have a tax status other than agriculture.
- **Availability of Public Services:** This is a qualitative assessment of whether services like police and fire present an adverse impact to agriculture.
- **Land Use Settlement Patterns:** This is a qualitative assessment of whether adjacent land uses are incompatible with commercial agriculture.
- **Intensity of Nearby Land Uses:** This is a qualitative assessment of whether the density and proximity of nearby uses create overwhelming pressure for the area to convert from agriculture.
- **Development History:** An impact is considered to exist if there is a record of 15 or more subdivision permits within a half-mile radius of the study area.
- **Alternative Land Uses:** An impact is considered to exist if land values in the study area are being assessed at a rate higher than that normally associated with agriculture.

The overall finding of the county's work was the establishment of this comprehensive de-designation framework itself. The process provides a structured and defensible methodology for analyzing proposals to remove land from the Agricultural Resource designation. By combining a quantitative scoring of land capability and development pressure with a qualitative assessment of other influencing factors, the county created a system to guide future land use decisions and ensure the protection of its most viable agricultural lands.

Appendix C. Public Engagement Summary

Below is a report by Triangle Associates which summarizes public engagement performed with stakeholders and the public from August to October 2025.

Exhibit "A"



DRAFT Farm and Agricultural Stakeholders' Interview Summary

Agricultural Lands Study
Clark County, Washington

September 2025

TRIANGLE

Prepared for:
Clark County, Washington
Community Planning Department
by Triangle Associates

Draft Farm and Agricultural Stakeholders' Interview Summary
Clark County Agricultural Lands Study

Interviews Conducted Aug–Sep 2025
Prepared by Triangle Associates for Clark County

Purpose: This document summarizes what Triangle Associates, a neutral third-party facilitation and public involvement firm, heard from 13 members of Clark County's farm and agricultural community during interviews conducted in August–September 2025. It highlights common themes, points of difference, and areas where additional information is needed. The goal is to help the County understand perspectives about the Agricultural Lands Study and design clear, accessible, and trustworthy next steps—such as community workshops and follow-up communications—as part of the Comprehensive Plan update. These findings are limited since the team was constrained with the project timing and received additional input from open houses, agricultural commission meetings, and from comment forms.

I. Executive Summary

Background and Purpose

Clark County hired Triangle Associates, through a sub-agreement with ECOnorthwest, to conduct a rapid interview process to inform the Agricultural Lands Study that will feed into the 2025 Comprehensive Plan update. This first phase concentrated on farmers, agricultural organizations, and others directly involved in working farmland. The goal was to capture their perspectives on current opportunities, challenges, and needs before broader public outreach begins.

Interviews were held August–September 2025 during peak harvest season, so participation was intentionally targeted and findings represent the views of agricultural stakeholders. The below key themes were found across the interviews that will be addressed in further detail.

Key Themes:

- **Relationships & Trust:** Desire for the County and the community at large to have a better understanding of the agricultural community and its needs.
- **Economic Substance:** Opportunities and risks under current land designations.
- **Planning Process:** Strategic land-use planning to support both rural and urban needs.
- **Zoning & Data:** Clarity and transparency in zoning decisions and data sources.
- **Regulatory Constraints:** More transparent agricultural regulations and stronger farmer support.
- **Equity & Access:** Engagement tactics must fit agricultural realities.

Input Implications for Clark County to Consider

- Emphasize education and transparency in upcoming and future County-hosted community workshops/open houses. The County and/or partners could create additional educational materials (such as factsheets, online tools, etc.) regarding agriculture in Clark County.
- Close the feedback loop with interviewees to show how input is used.

Conditions for Success

- Define scope, set realistic timelines, and communicate transparently about how input will be used.
- Partner with trusted co-hosts and ensure engagement is accessible (evening/off-season options, bilingual outreach).
- Provide clear information on zoning, regulations, and resources to build credibility and trust.

II. Methods & Participation

Approach

Triangle conducted one-hour confidential interviews and applied a grounded theory approach—using constant comparison and iterative analysis to identify common themes and differences. Quotes used in this memo are anonymized.

Interviewee Snapshot

Interviewees represented a variety of perspectives within the Clark County agricultural community. Participants will have an opportunity to review the draft memo. For a list of those interviewed, see *Attachment A* for details.

Limitations

Engagement overlapped with harvest season, limiting farmers' availability. The compressed timeline and remaining interviews mean findings should be considered limited.

III. Key Themes

1. Relationships & Trust: *Education on Agricultural Practices and Needs*

Insights from Interviews: Farmers voiced distrust in County processes and see decisions as disconnected from agricultural realities. They want planners, staff, and the public to better understand farming needs (soils, water, infrastructure) and the benefits farms provide.

Voices from the Field: All interviewees consistently emphasized Clark County's strong soil and climate quality and the need to share this knowledge with the community. They highlighted the importance of educating both County representatives and new residents on farming practices, the county's agricultural legacy, challenges for farmers, and its role in food production. Greater transparency and education were seen as key to building trust and reducing tensions between the County, farmers, and residents.

"(We have) world class soils in Clark County… there is a lack of understanding on why this land is important."

Next Steps to Explore: County staff, officials, and the broader public need targeted education on agriculture to make credible decisions and rebuild trust.

2. Economic Substance: *Opportunities and Pitfalls under Current Land Designations*

Insights from Interviews: Rising costs, development pressure, and infrastructure loss threaten agriculture—but local markets, co-ops, and agritourism show promise for long-term economic contribution and food security.

Voices from the Field: Most interviewees highlighted the economic and social opportunities inherent in farming locally, as well as the pitfalls of investing too heavily in development in the area. Supporting food security through direct to market sales as well as agritainment[2] /agrotourism could bolster the economic viability of farming in Clark County. Without Agricultural designation, farms can still produce; however, the inherent benefits of designation are not achieved (i.e. tax exemptions) and farms struggle. By supporting the economic stability of farms over development, farmers can contribute long-term to the County over the "boom-bust" dynamic of rapid urbanization.

"We're losing the opportunity to supply the large Portland metro area with food because we are developing over some of the best farmland in the country."

Next Steps to Explore: Clark County's agricultural economy is fragile yet full of potential; investment in infrastructure and diversified markets can strengthen resilience.

3. Planning Process: *Strategic Land Planning to Support both Rural and Urban Needs*

Insights from Interviews : Interviewees called for balanced planning that preserves contiguous farmland and directs housing growth away from prime soils. Many fear that rushed timelines will produce poor outcomes and further erode trust.

Voices from the Field: Most interviewees shared that they feel current land planning is not strategic and needs to be more conscious of famers (i.e. fragmentation of agricultural parcels, leading to challenges for farmers) and reduce the sway of developers on County policies. Additionally, some interviewees reported feeling discouraged with the current timeline of the Agricultural Lands Study, reflecting that this timeline may not lead to the most strategic planning efforts moving forward if not all perspectives/options are considered (e.g. considering more vertical, multifamily development rather that horizontal, single family).

"When I drive in the County, I'll find a stretch where there's a new suburb in the middle of nowhere… giving adequate time [for planning] is important, having things rushed doesn't build confidence."

Next Steps to Explore: Long-term, strategic planning—rather than reactive decisions—is essential to balance rural and urban needs. The Comprehensive Plan and other future planning can reflect this thoughtful strategic approach.

[2] *Agritainment refers to farm-based entertainment including activities such as hayrides, pony rides, wine tasting, cornfield-maze contests, and harvest festivals.*

4. Zoning & Data: *Clarity of Zoning Decisions and Data*

Insights from Interviews: Current zoning is viewed as confusing and inconsistently enforced. Farmers want transparent maps and reliable data to guide both preservation and development.

Voices from the Field: Most interviewees noted there is a current lack of clarity on land designation and the decisions made regarding development on land. Increasing this clarity on what land is best suited for agricultural use versus development would be beneficial to understanding how decisions are made. Referencing multiple sources of data was suggested by some interviewees to ensure consistency.

"Rural designation doesn't really mean anything… there should be more defined clarity."

Next Steps to Explore: A clear, credible baseline dataset of agricultural lands and education on how to navigate it will enable informed decisions for both farmers and developers.

5. Regulatory Constraints: *Transparency of Agricultural Regulations & Bolstering of Support*

Insights from Interviews: Permitting and regulations are often costly, inconsistent, and create barriers. Farmers report limited extension services and conservation funding.

Voices from the Field: Specific interviewees shared poor experiences with County regulatory agencies in regard to policies that would support their farms or infractions of policies that were not clearly identified. Some interviewees mentioned the use of a "County liaison" would be helpful to support farmers and County representatives when navigating challenging/multi-jurisdictional regulations.

"This is an existential threat to my farm… need a single point for farmers to go through for information."

Next Steps to Explore: Simplified, transparent regulatory structures and stronger support services (e.g., a County agricultural liaison) are needed to keep farms viable.

6. Equity & Access: *Engagement Tactics for Agricultural Needs*

Insights from Interviews: Farmers are frequently excluded by meeting timing, internet access, and lack of bilingual outreach. Developers tend to dominate the process.

Voices from the Field: Some interviewees highlighted the inherent difficulties of engagement with the agricultural community, which have been made harder due to the timeline of engagement. Recommendations were made to consult with more rural members of the community to ensure all parties were engaged, as well as bringing in organizations such as LULAC to ensure a diverse representation of parties that engage with agriculture. Additional suggestions were made by one interviewee to incorporate developers in this land assessment to communicate the importance of conserving farmland.

"August is the busiest time of year for farmers… meetings start at 9 on a weekday, most people can't contribute…You need to go to the churches or producer meetups at local bars."

Next Steps to Explore: Engagement must align with agricultural schedules, locations, and communication channels, and amplify voices with less political power.

IV. Convergence, Divergence & Data Gaps

Broad Agreement

- Farmers lack adequate resources and support to stay in agriculture.
- Education about farming practices and the County's agricultural legacy is essential.
- Engagement must avoid harvest season, with engagement in the Winter and early Spring, and be hosted in rural locations with County presence.

Divergent Views

- Some advocate conserving all agricultural land; others prioritize only contiguous, highly productive areas.
- Some interviewees shared specific locations where agricultural land should be designated (e.g. West of 41st Ave., North of 139th) while others indicated specific regions (e.g. Sara, Whipple Creek,) and others specified contiguous areas of farmland should be conserved.

Data Gaps

- Specific interviewees indicated a need to review current data on what land is currently zoned and used as agriculture, non-agriculture zoned land being used for agriculture, and land that is not used/no designated for agriculture but should be based on soil/climate data.
- Resources for farmers on conservation easements, direct-to-market sales regulations, and support programs.
- Specific interviewees noted that Clark County is similar to other counties in Washington and Oregon in terms of development and agricultural practices, and that by reviewing land zoning practices in similar counties, more insight can be gained as to how to best support agriculture.

V. Feasibility & Readiness

Farmers express both distrust and cautious willingness to engage. Clark County's valuable soils and climate are widely recognized, but credibility hinges on transparency, education, and tailored outreach. Harvest-season timing remains a key barrier.

Conditions for Success

- Clearly define engagement scope and timelines.
- Communicate how input will be used.
- Work with trusted farm organizations and schedule off-season or evening events.
- Provide clear zoning and regulatory information.
- Schedule engagement outside of peak agricultural seasons.
- Avoid perceived "performative" processes lacking transparency.
- Include agricultural expertise or liaison within County staff.
- Avoid confusing or inconsistent zoning and regulatory decisions.

VI. Recommended Next Steps

To build trust and broaden participation beyond the initial 13 agricultural interviews, Triangle recommends that Clark County carry forward engagement in partnership with the Agricultural Advisory Commission (AAC) and other agricultural leaders, including the following actions.

1. Partner with the Agricultural Advisory Commission

- Make the Agricultural Lands Study a standing agenda item at Agricultural Advisory Commission (AAC) meetings so farmers have a predictable forum to track progress and offer real-time feedback.
- Ask the AAC to review and endorse the draft survey before it is released and to help identify additional stakeholders and outreach channels.

2. Conduct Two Educational Public Workshops/Open Houses

- As planned, hold two open houses, one on September 30, 2025, and one on October 28, 2025.
- Structure each workshop around education and clarity, with clear explanations of:
    - the Agricultural Lands Study's purpose and its role in the Comprehensive Plan,
    – zoning regulations and available data (including maps of prime soils and current agricultural uses), and
    - the decision-making timeline and how public input will be used.
- Provide bilingual materials (English and Spanish at minimum) and hold events at times and locations that work for farmers.

3. Close the Feedback Loop

- After each engagement milestone (first workshop, second workshop, survey), publish a short "What We Heard / How We're Using It" memo summarizing key input and describing how that input will shape Comprehensive Plan decisions.
- Share these summaries first with the AAC and then with all participants to demonstrate transparency and reinforce trust.

4. Prepare for Comprehensive Plan Integration

- As the County begins drafting Comprehensive Plan language related to agricultural lands, invite the AAC to review and provide an advisory recommendation before the draft goes to public comment.
- Continue to use AAC meetings as a forum for updates and to evaluate what worked well in the engagement process.

Attachment A: *Interview Participants & Affiliations*

The table below lists the 13 interviewed farmers and agricultural stakeholders—shown by participant code and affiliation only—to protect individual identities while providing the interview date and whether the conversation was held virtually or in person.

Participant	Affiliation	Interview Date	Mode (Virtual/In-person)
INT#1	Farmer	8/14/25	Virtual
INT#2	Friends of Clark County (FOCC)	8/15/25	Virtual
INT#3	FOCC	8/18/25	Virtual
INT#4	Farmer	8/20/25	Virtual
INT#5	FOCC	8/22/25	Virtual
INT#6	Ag Commission Member	8/22/25	Virtual
INT#7	Ag Commission Member	8/26/25	Virtual
INT#8	Ag Commission Member	8/27/25	Virtual
INT#9	Ag Commission Member	8/28/25	In person, Vancouver WA
INT#10	Ag Commission Member	9/3/25	Virtual
INT#13	Ag Commission Member	9/3/25	In person, Vancouver WA

Attachment B: Interview Questions

1. **Your Background:** What is your connection to agriculture in Clark County, and why are you interested in the Agricultural Lands Study and Comprehensive Plan update?
2. **Motivations for Engagement:** What aspects of this study or process matter most to you personally or professionally?
5. **Food Security & Resources**: What role does agriculture—and land designation—play in supporting long-term food security for Clark County? What concerns or ideas do you have about this?
6. **Current Experience:** Have any County policies or zoning designations helped or hurt your livelihood or goals?
7. **Ideal Future:** What would success look like to you in how the County updates its agricultural lands designations? What would help build confidence that this process is fair, transparent, and based on sound data?
8. **Future-Proofing:** Given pressures on land use and competing interests, what steps do you think the County should take to protect agricultural or resource lands in the long term?
9. **Possible Outcomes**: This study may lead to no change, confirmation of current designations, or new areas being designated for agriculture. How do you view these possibilities? What concerns or hopes do you have about potential zone changes?
10. **Current Designations:** Are there areas in the county you believe should be protected for agriculture but currently aren't designated as such?
11. **Technical vs. Community Priorities**: While much of this process is technical, many people hold strong feelings about land use. What do you think the County should keep in mind to balance both data and lived experience?
12. **Key Individuals or Groups:** Who else should be part of this conversation—especially voices that may be underrepresented or critical to the Comprehensive Plan update success?
13. **Engagement:** What would it take to meaningfully involve those individuals or groups in this process?
14. **Outreach Preferences:** What kinds of outreach (e.g., phone calls, flyers, social media, community events) are most likely to reach and engage the people or communities you mentioned?
15. **Workshop Design:** What elements do you think are essential for a successful workshop?
16. **Meeting Venues & Timing:** Are there existing events, locations, or gathering places that would be effective for holding workshops or outreach events? What days of the week and time of day? Are there language needs?
17. **Unaddressed Issues:** What important issues should be addressed that you feel haven't been addressed yet in this process?
18. **Anything Else to Share:** Is there anything else you'd like to share that we haven't discussed? Anyone else we should reach out to?

Open House Comment Summary

September 30, 2025

Twenty five submittals were received as a part of the public open house on September 30, 2025, at the Battle Ground Community Center in Battle Ground, WA. Seventy-nine participants attended the Open House in total. Below is a summary of the input received:

WAC criteria supporting sustainable and commercially viable long-term agriculture in Clark County

Commenters frequently noted tax status, predominant parcel size, compatible surrounding land use settlement patterns, and historical use including development permits as key factors to consider. Several commenters also mentioned considering the environmental and local food security impact of designating rural or agricultural areas. One commenter also mentioned the importance of considering water availability for agricultural usage.

Map Feedback

Commenters noted that the maps were difficult to decipher and sometimes seemed contradictory to each other and to known conditions on the ground. Some commenters noted the benefits of looking at historical mapping or connecting with local groups with on-the-ground knowledge. Several commenters noted the need for closer evaluation of Ag20 lots in the future.

Food Security

The majority of commenters noted the importance of focusing on food security in Clark County as a way of promoting community resilience. Commenters noted the need for local markets and consideration of small acreage farms and community gardens.

Lot Size

Commenters reflected a variety of perspectives on how lot size should be taken into account as part of the study, with some commenters speaking to the productivity of small acreage farms and other commenters speaking to the difficulty of farming in small areas and the consequent importance of having large areas of land that are zoned agricultural. Several commenters spoke to smaller lot size as a way to right-size the lot to the development needs of the owners and residents.

Water Rights

A few commenters highlighted the importance of water rights for agricultural land and the need to consider water availability when evaluating the worth of agricultural land. One commenter emphasized the increased importance of this to be resilient to future weather conditions.

Alternative Uses

Several commenters noted the importance of balancing the historic use of agricultural land with potential development, considering on-the-ground productivity of the land.

Livestock

A few commenters highlighted the importance of considering livestock as a potential usage when evaluating agricultural land.

Open House Comment Summary

October 29, 2025

Eleven submittals were received as a part of the public open house on October 28, 2025 at the Battle Ground Community Center in Battle Ground, WA. Sixty-three participants attended the Open House in total. Below is a summary of the input received:

Ground Conditions vs. Map Findings

Many of the commenters noted the importance of going to the physical locations that the study evaluated, since conditions such as actual soil quality and need for soil amendments and need for irrigation make some land unusable or difficult to use for agricultural purposes, while other land is currently in agricultural use and is more productive than indicated in the maps. Commenters noted that the study had too short of a timeline and would have benefited from more on-the-ground analysis and soil sampling.

Map Feedback

Several commenters noted that the maps were difficult to decipher. More clear landmarks, such as major roads and railroad lines, would be helpful. Attendees also expressed confusion regarding the map's symbols. It was not clear to all participants that the uncolored (white) tax lots represented lands *within* the study area but *outside* the defined agricultural land base.

Separately, some attendees stated that the soil information shown was incorrect, referencing older soil surveys.

Desire for Particular Land Designations and Zoning

A few commenters reflected on their desire to have as much land remain in agricultural use as possible. No specific recommendations on the maps and analysis were made on this basis, but rather the importance of agricultural land in Clark County was highlighted as a priority. A few other commenters indicated specific lots that they believed should not be designated as agricultural land and cited reasons such as the need to meet the requirements for job and housing allocations. One commenter highlighted their interest regarding the designation of farm land into smaller parcels, or allowing multiple homes to be built on one farm property, to help sustain farming across generations.

Public Engagement

Throughout the analysis, Triangle Associates and ECOnorthwest received comments and materials from regional stakeholders regarding the analysis. These materials were received, read, and will be provided to the Clark County Council for use in their decision-making process.

Additionally, ECOnorthwest attended three meetings with the Clark County Agricultural Advisory Commission from August to October. ECOnorthwest solicited feedback from the Commission on each occasion. Some of the common themes that emerged related to:

- Food security
- Water rights and irrigation
- Development pressure and encroachment
- Concerns about land fragmentation
- Data vs. ground truthing

ECOnorthwest took careful consideration of the Commission's input when developing and conducting the analysis. Future input by the Commission will be available to County Commissioners.

E. Dalmation Dr, E Airedale Dr, and E 24th Ave – La Center



Photo taken from E 24th Avenue facing southwest Photo shows ongoing residential construction. Photo taken 9-14-2026.

E. Dalmation Dr, E Airedale Dr, and E 24th Ave – La Center



Photo taken from E 24th Avenue facing southwest. Photo shows ongoing residential development. Photo taken 9-14-2026.

E. Dalmation Dr, E Airedale Dr, and E 24th Ave – La Center



Photo taken from E Airedale Avenue facing southwest. Photo shows ongoing residential construction. Photo taken 9-14-2026.

E. Dalmation Dr, E Airedale Dr, and E 24th Ave – La Center



Photo taken from E Airedale Avenue facing south. Photo shows ongoing residential construction. Photo taken 9-14-2026.

E. Dalmation Dr, E Airedale Dr, and E 24th Ave – La Center



Photo taken from E Airedale Avenue facing east. Photo shows ongoing residential construction. Photo taken 9-14-2026.

E. Dalmation Dr, E Airedale Dr, and E 24th Ave – La Center



Photo taken from E Airedale Avenue facing west. Photo shows ongoing residential construction. Photo taken 9-14-2026.

E. Dalmation Dr, E Airedale Dr, and E 24th Ave – La Center

Stephen's Hillside Farm housing development in La Center, Washington



Photo taken from W 19th St facing north. Photo shows ongoing residential construction. Photo taken 9-14-2026.

Stephen's Hillside Farm housing development in La Center, Washington



Photo taken from W 20th Way facing north. Photo shows residential development. Photo taken 9-14-2026.

Stephen’s Hillside Farm housing development in La Center, Washington



Photo taken from W 20th Way facing north. Photo shows plots available for residential development by New Tradition Homes. Photo taken 9-14-2026.

E Otter Loop – La Center, Washington



Photo taken from E Otter Loop facing east. Photo shows ongoing residential construction. Photo taken 9-14-2026.

E Otter Loop – La Center, Washington



Photo taken from E Otter Loop facing north. Photo shows ongoing residential construction. Photo taken 9-14-2026.

E Otter Loop – La Center, Washington



Photo taken from E Otter Loop facing north. Photo shows ongoing residential construction. Photo taken 9-14-2026.

E Otter Loop – La Center, Washington



Photo taken from E Otter Loop facing west. Photo shows ongoing residential construction. Photo taken 9-14-2026.

Costco and N 56th Place – Ridgefield, Washington



Photo taken from the sidewalk off 56th street facing west. Photo shows Costco building, Costco parking lot, and Costco gas station. Photo taken 9-14-2026.

Costco and N 56th Place – Ridgefield, Washington



Photo taken from the sidewalk off N 56th Place street facing north. Photo shows north end of N 56th Place and entry into Costco parking lot. Photo taken 9-14-26.

Costco and N 56th Place – Ridgefield, Washington



Photo taken from sidewalk of N 56th Place facing east. Photo shows new commercial buildings for lease. Photo taken 9-14-26.

Costco and N 56th Place – Ridgefield, Washington



Photo taken from sidewalk of N 56th Place facing east. Photo shows zoomed in image of prior photo of new commercial buildings for lease. Photo taken 9-14-26.

Costco and N 56th Place – Ridgefield, Washington



Photo taken from sidewalk of N 56th Place facing east. Photo shows new commercial buildings, including In-and-Out and Dental Care of Union Ridge. Photo taken 9-14-26.

Costco and N 56th Place – Ridgefield, Washington



Photo taken from sidewalk of N 56th Place facing south. Photo shows roundabout intersection of N 56th Place and Pioneer Canyon Drive, including construction on property southwest of the roundabout. Photo taken 9-14-26.

Costco and N 56th Place – Ridgefield, Washington



Photo taken from sidewalk of N 56th Place facing north. Photo shows Costco parking lot view from roundabout intersection of N 56th Place and Pioneer Canyon Drive. Photo taken 9-14-26.

Costco and N 56th Place – Ridgefield, Washington



Photo taken from sidewalk of N 56th Place facing south. Photo shows commercial development on N 56th Place. Photo taken 9-14-26.

Neighborhood off of NW Hillhurst Rd in Ridgefield, Washington (S. Arwana Lane and surrounding area)



Photo taken from S 36th Drive facing northeast. Photo shows ongoing residential construction. Photo taken 9-14-2026

Neighborhood off of NW Hillhurst Rd in Ridgefield, Washington (S. Arwana Lane and surrounding area)



Photo taken from S 36th Drive facing north. Photo shows wash pit and ongoing residential construction. Photo taken 9-14-2026

Neighborhood off of NW Hillhurst Rd in Ridgefield, Washington (S. Arwana Lane and surrounding area)



Photo taken from S 36th Drive facing north. Photo shows ongoing residential construction. Photo taken 9-14-2026

Neighborhood off of NW Hillhurst Rd in Ridgefield, Washington (S. Arwana Lane and surrounding area)



Photo taken from S 36th Drive facing northwest. Photo shows ongoing residential construction. Photo taken 9-14-2026.

Neighborhood off of NW Hillhurst Rd in Ridgefield, Washington (S. Arwana Lane and surrounding area)



Photo taken from intersection of S 36th Dr and S 44th Lane. Photo shows ongoing residential construction. Photo taken 9-14-2026.

Neighborhood off of NW Hillhurst Rd in Ridgefield, Washington (S. Arwana Lane and surrounding area)



Photo taken from S 44th Lane facing north. Photo shows residential construction within residential neighborhood. Photo taken 9-14-2026.

Neighborhood off of NW Hillhurst Rd in Ridgefield, Washington (S. Arwana Lane and surrounding area)



Photo taken from Green Pastures Drive. Photo shows ongoing residential development. Photo taken 9-14-2026.

Paradise Point Neighborhood in Ridgefield, Washington



Photo taken from N 12th Way. Photo shows ongoing residential construction. Photo taken 9-14-2026.

Paradise Point Neighborhood in Ridgefield, Washington



Photo taken from N 12th Way. Photo shows ongoing residential construction. Photo taken 9-14-2026.

Paradise Point Neighborhood in Ridgefield, Washington



Photo taken from Paradise Avenue and N 15th Way. Photo shows existing residential homes and ongoing residential construction on N 15th Way. Photo taken 9-14-2026.

Paradise Point Neighborhood in Ridgefield, Washington



Photo taken from intersection of Paradise Ave and N 16th Way. Photo shows ongoing residential construction. Photo taken 9-14-2026.

Paradise Point Neighborhood in Ridgefield, Washington



Photo taken from intersection of Paradise Ave and N 16th Way (different angle from prior photo). Photo shows ongoing residential construction. Photo taken 9-14-2026.

Paradise Point Neighborhood in Ridgefield, Washington



Photo taken from Paradise Ave facing northeast, taken north of the intersection of Paradise Avenue and N 16th Way. Photo shows residential construction on Paradise Ave. Photo taken 9-14-2026.

Paradise Point Neighborhood in Ridgefield, Washington



Photo taken from Paradise Ave facing northwest, taken north of the intersection of Paradise Avenue and N 16th Way. Photo shows residential construction off of N 16th Way and N 41st Ct. Photo taken 9-14-2026.

Paradise Point Neighborhood in Ridgefield, Washington



Photo taken from intersection of Paradise Avenue and N 16th Way facing west. Photo shows residential construction off of N 16th Way. Photo taken 9-14-2026.

Paradise Point Neighborhood in Ridgefield, Washington



Photo taken from intersection of Paradise Avenue and N 16th Way facing west (different angle of prior photo). Photo shows residential construction off of N 16th Way. Photo taken 9-14-2026.

Paradise Point Neighborhood in Ridgefield, Washington



Photo taken from N 43rd Avenue as it turns into N 16th Way. Photo shows ongoing residential construction. Photo taken 9-14-2026.

Paradise Point Neighborhood in Ridgefield, Washington



Photo taken from intersection of N 43rd Avenue and N 18th Circle. Photo shows ongoing residential construction. Photo taken 9-14-2026.

Paradise Point Neighborhood in Ridgefield, Washington



Photo taken from NW 289th St facing south. Photo shows sign from “Cascade West” about “Design and Build – Award Winning Homes”. Photo taken 9-14-2026.

Paradise Point Neighborhood in Ridgefield, Washington



Photo taken from Storybrook Hollow Park. Photo taken 9-14-2026.

Paradise Point Neighborhood in Ridgefield, Washington



Photo taken from Storybrook Hollow Park. Photo taken 9-14-2026.