City Council Workshop Agenda
Monday, November 17, 2025, 4:30 PM
Council Chambers, 616 NE 4th AVE

NOTE: The City welcomes public meeting citizen participation. TTY Relay Service: 711. In compliance with the ADA, if you need special assistance to participate in a meeting, contact the City Clerk's office at (360) 834-6864, 72 hours prior to the meeting so reasonable accommodations can be made (28 CFR 35.102-35.104 ADA Title 1)

To observe the meeting (no public comment ability)
- go to https://vimeo.com/event/5518558

To participate in the meeting (able to public comment)
- go to https://us06web.zoom.us/j/88548119347
(public comments may be submitted to publiccomments@cityofcamas.us)

CALL TO ORDER

ROLL CALL

PUBLIC COMMENTS

WORKSHOP TOPICS

1. 2026 Property Tax Presentation
   Presenter: Debra Brooks, Budget Analyst and Cathy Huber Nickerson, Finance Director
   Time Estimate: 20 minutes

2. Our Camas 2045 – Land Use Element
   Presenter: Alan Peters, Community Development Director
   Time Estimate: 30 minutes

3. Construction Award Well Casing Decommissioning
   Presenter: Rob Charles, Utilities Manager
   Time Estimate: 5 minutes

4. Construction Award Main Pump Station Improvements
   Presenter: Rob Charles, Utilities Manager
   Time Estimate: 5 minutes

5. Resolution No. 25-015 Station 41 General and Construction Manager Contract
   Presenter: Cliff Free, Fire Chief and Shaun Ford, Division Chief of EMS
   Time Estimate: 15 minutes

6. Staff Miscellaneous Updates
   Presenter: Doug Quinn, City Administrator
   Time Estimate: 10 minutes

PUBLIC COMMENTS

COUNCIL COMMENTS AND REPORTS

CLOSE OF MEETING

Staff Report

November 17, 2026 Council Workshop Meeting

2026 Property Tax Presentation
Presenter: Debra Brooks, Budget Analyst and Cathy Huber Nickerson, Finance Director
Time Estimate: 20 minutes

Phone	Email
360.817.7025 360.817.1537	dbrooks@cityofcamas.us chuber@cityofcamas.us

BACKGROUND: This presentation is designed to provide an overview of the 2026 property tax levy options the Council has with the Implicit Price Deflator above 1%. Staff will provide the two options and will request direction for the 2026 Budget Readoption.

SUMMARY: Property taxes are the primary revenue source for funding of general fund services and emergency medical services for the City of Camas. Property taxes are complicated with different limitations but the one limit which requires the City Council's annual consideration is the Levy Increase Limit. In Washington State, property taxes increases are not based on the increasing value of properties but rather on the amount of property taxes that are assessed from the prior year. Each year's levy may be increased by no more than 1% or the Implicit Price Deflator (IPD) whichever is less. The IPD is the percentage change in the implicit price deflator for personal consumption as published by the Bureau of Economic Analysis by September 25th. The IPD for the 2026 property tax levy is 2.44%. Therefore, the lawful highest levy would be 1% increase.

The City always has the option to levy the prior year levy amount as well, which would be a 0% increase in the levy.

These options impact the taxpayer but generally in Camas, it is usually a nominal amount variance between the options. The presentation will review the options for the General Fund levy. The presentation will also provide the average taxpayer's impact with all options.

The presentation will briefly cover the Camas EMS Levy which has the same calculation as the General Fund levy, and the Public Safety Bond Levy approved by the voters in August 2024.

BENEFITS TO THE COMMUNITY: The intent of the presentation is to provide options to City Council to determine which levy will benefit the whole community while maintaining affordable tax rates. Property taxes support essential public safety and safe streets, library hours and programming, park events and recreation, safe trails and bike paths and event gatherings such as Hometown Holidays.

STRATEGIC PLAN: Property taxes fund the following priorities:

- Safe and Accessible Community
- Stewardship of City Assets
- Vibrant Community Amenities
- Economic Prosperity
- Engaged Workforce

POTENTIAL CHALLENGES: For residents who are having difficulty to pay their property tax bill the Clark County Assessor's Office can provide exemptions for homeowners who are within certain age and income groups as well as homeowners who may be disabled.

BUDGET IMPACT: The 2025 Budget is projected to incorporate the 1% levy increase. In the past, Council has maintained the 1% to ensure the compounding impact of the 1% is preserved. To compare the options:

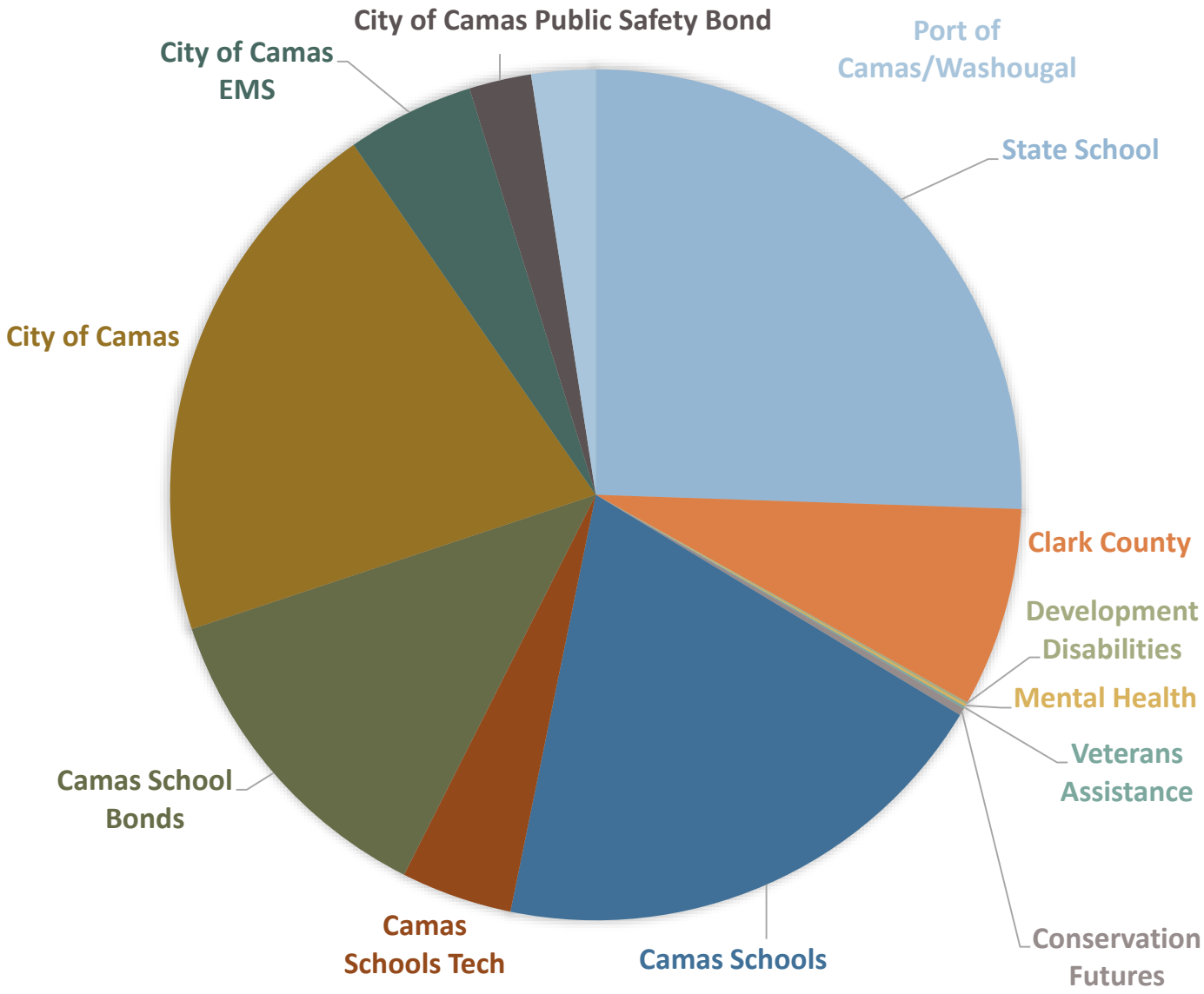
Option Number	General Fund Levy	Tax Levy	Tax Rate	Annual Impact on Homeowner Of $658,861 Home
1.	0%	$15,679,270	$1.80/$1,000	$1,238 ($76 less than 2025)
2.	1%	$15,836,063 $156,793 more than #1	$1.81/$1,000 $0.01 more than #1	$1,225 ($64 less than 2025) $13 more than #1

RECOMMENDATION: Staff recommends the 1% property tax increase to be dedicated to public health and safety and to preserve the base revenue source of the City's General Fund given the low financial impact to average homeowner.

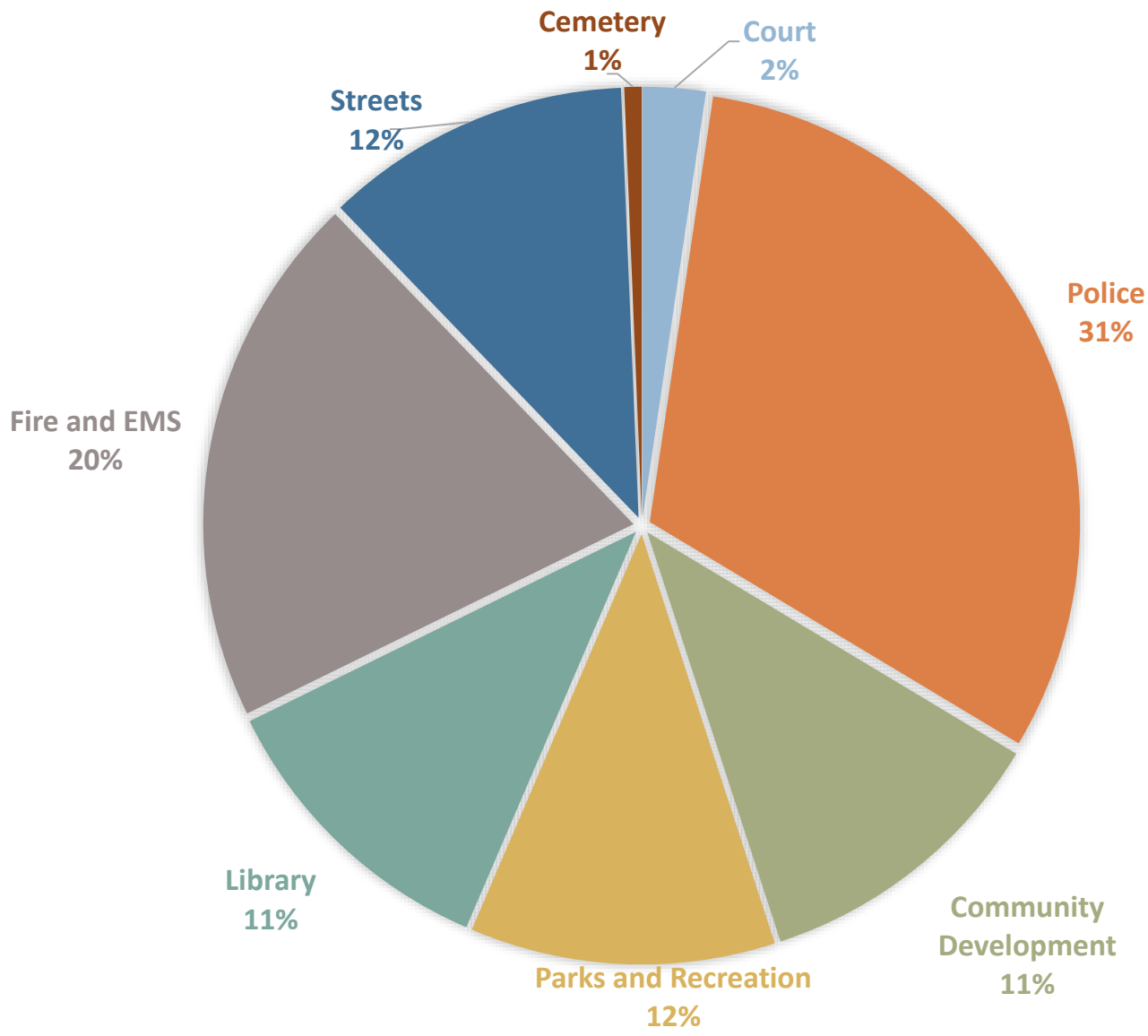
2026 Property Tax Presentation

CITY OF CAMAS 2026 BUDGET PREPARATION

Property Tax Bill in Camas

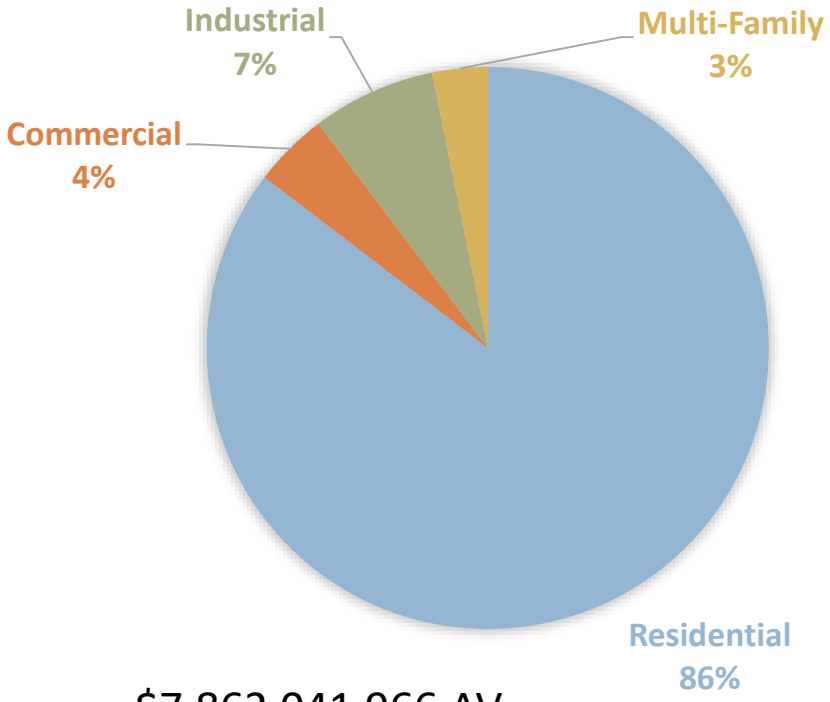


City Services Supported by Property Taxes



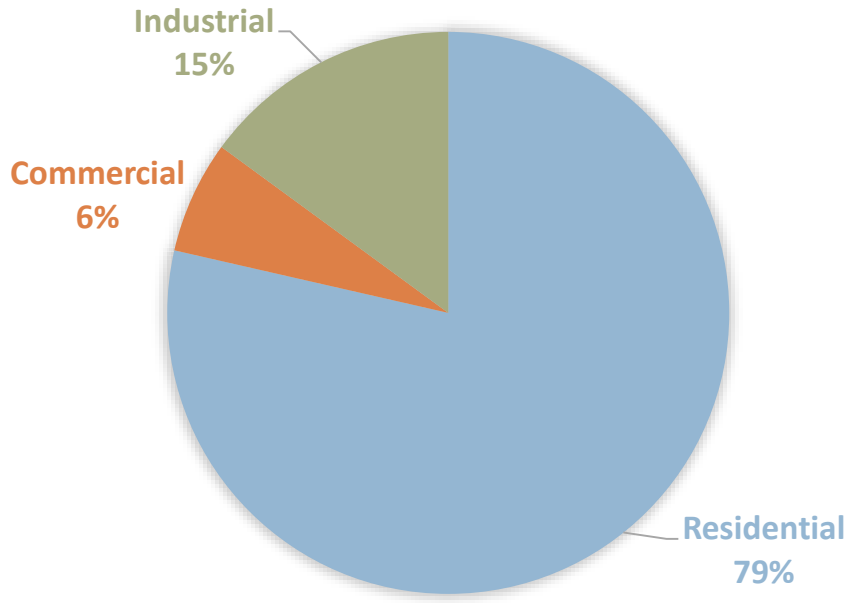
Who Pays Property Taxes in Camas?

2025



$7,862,041,966 AV

2015



$3,057,792,812 AV

Excludes Personal Property and State Assessed Property

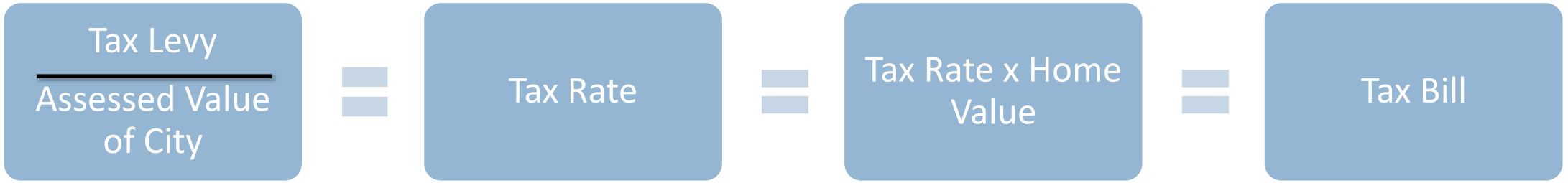
Property Taxes Per Person

Calculating a tax levy

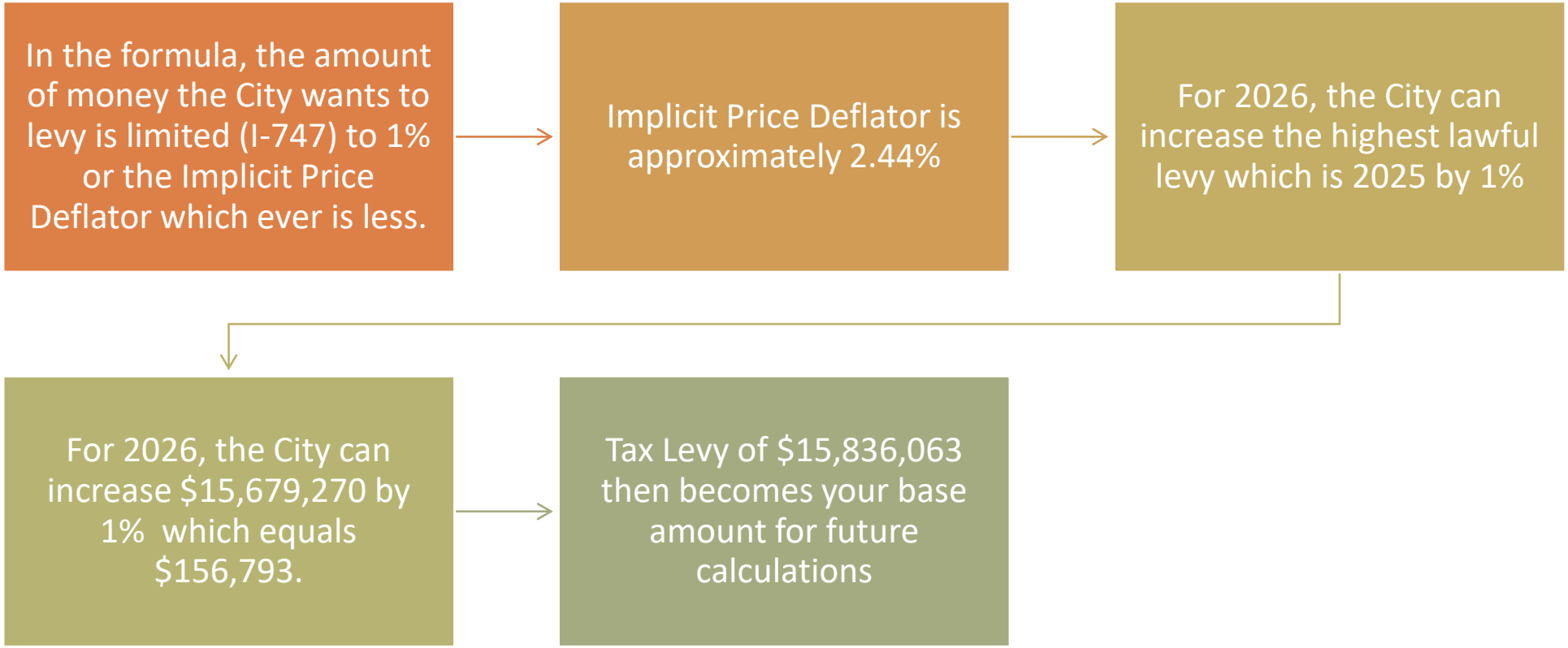
The levy process is simple:

- The amount of money needed by the City's budget divided by the value of all the taxpayers' properties in the City.
- This equals the tax rate for the City
- This rate is then levied on the taxpayer's property per $1,000

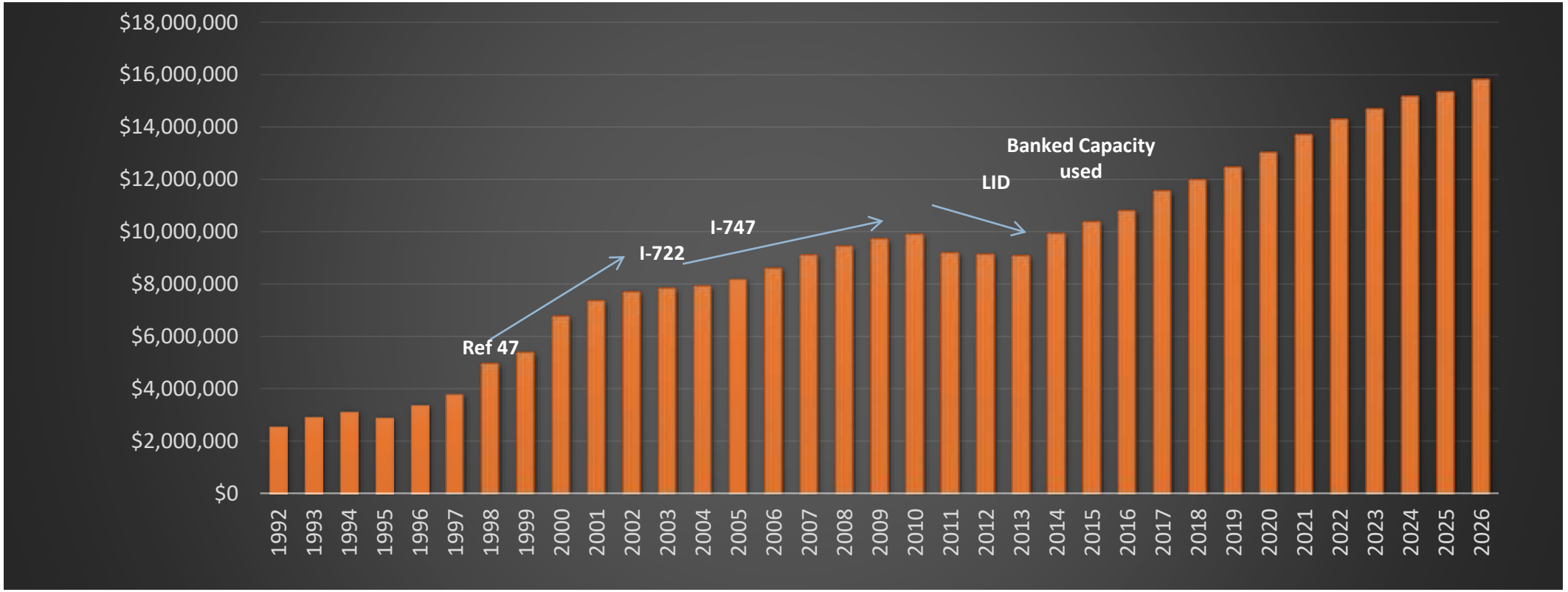
City Property Tax Formula



Tax Levy - Limit



Lawful Tax Levy



Banking Capacity

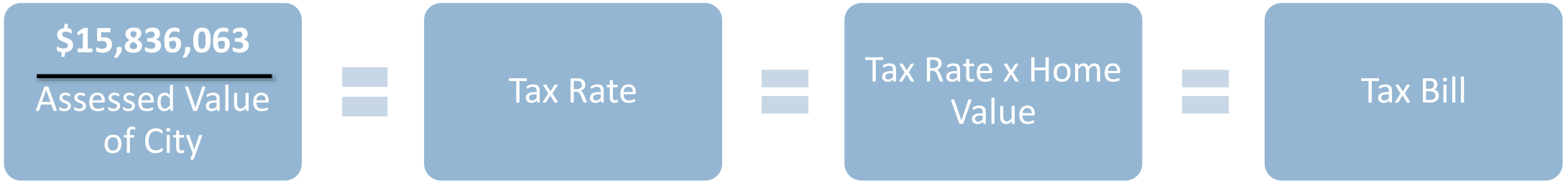
The 1% limit is an increase adopted by ordinance each year.

Council has three options:

- Adopt the 1% increase
- Keep prior year levy
- Or bank the 1% which means Council sets it aside to use another year. Essentially “saving” it for another time.

Camas has banked the 1% in 2009 until 2014 and the 1% in 2023 until 2024.

City Property Tax Formula



Assessed Value

Clark County Assessor's Office values property for an Assessed Value amount.

Goal is market value, but it is a snapshot in time.

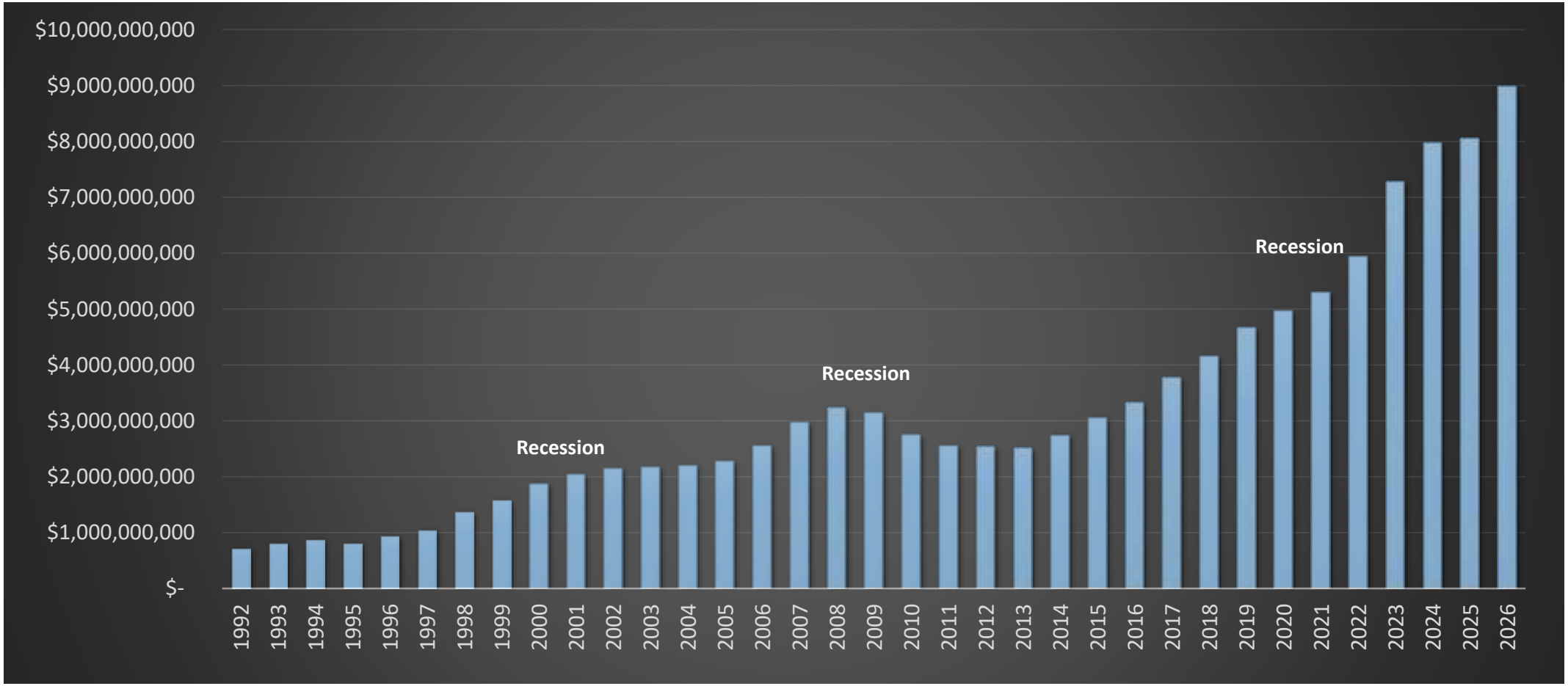
Comparable sales are used.

- Difficult at best in this real estate market.

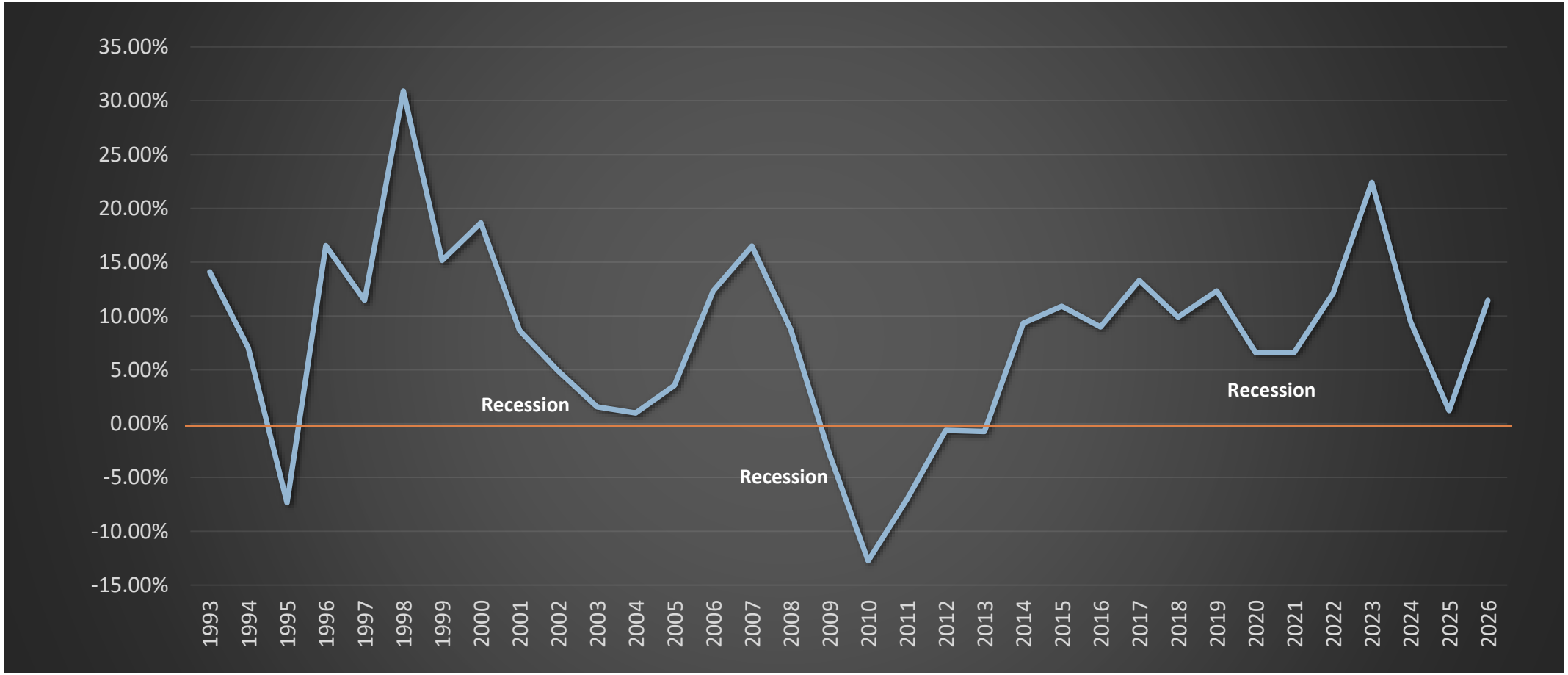
Annual valuations are done but physical assessments are on a cycle.

Check out

- **http://gis.clark.wa.gov/applications/gishome/property/**

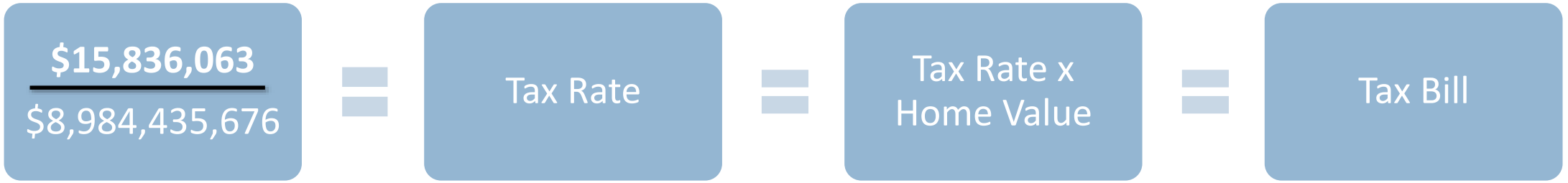


Assessed Value



Assessed Value Growth

City Property Tax Formula



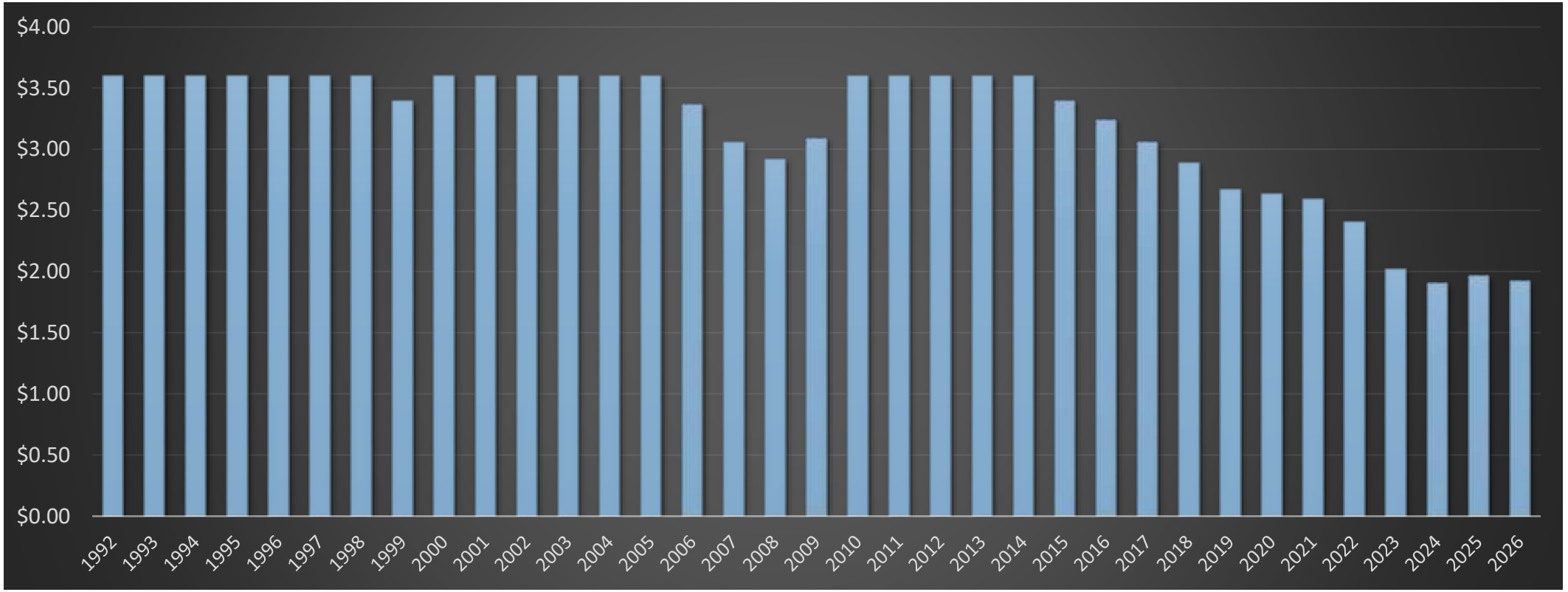
Assessed value is an estimate from the Assessor's Office but the final assessed value should be available soon

Tax Rate is the amount of Tax Levy divided by assessed value multiplied by $1,000

In 2025 it is $1.96449 per $1,000

Tax Rate

Tax Rates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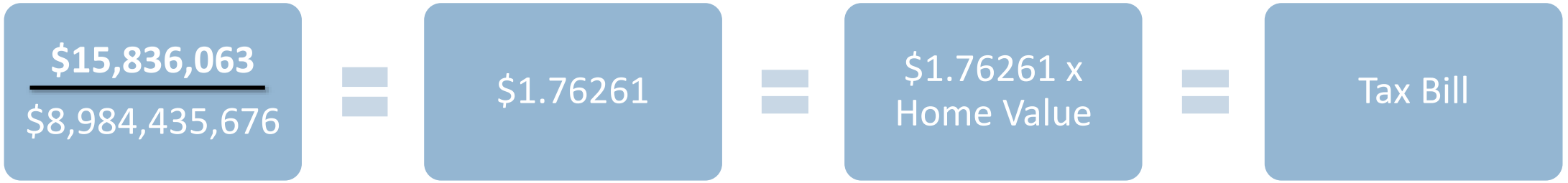
Comparison Tax Rates by City (2025)

City	Tax Levy	Note
Battle Ground	$1.0025	No Fire/Library
Camas	**$1.9449** **$1.2349**	**With Fire/Library** **No Fire/Library**
LaCenter	$0.7856	No Fire/Library
Ridgefield	$0.6131	No Fire/Library
Vancouver	$2.1275	No Library
Washougal	$1.5584	No Library
Woodland	$0.6850	No Fire/Library
Yacolt	$1.0694	No Fire/Library

City Property Tax Formula



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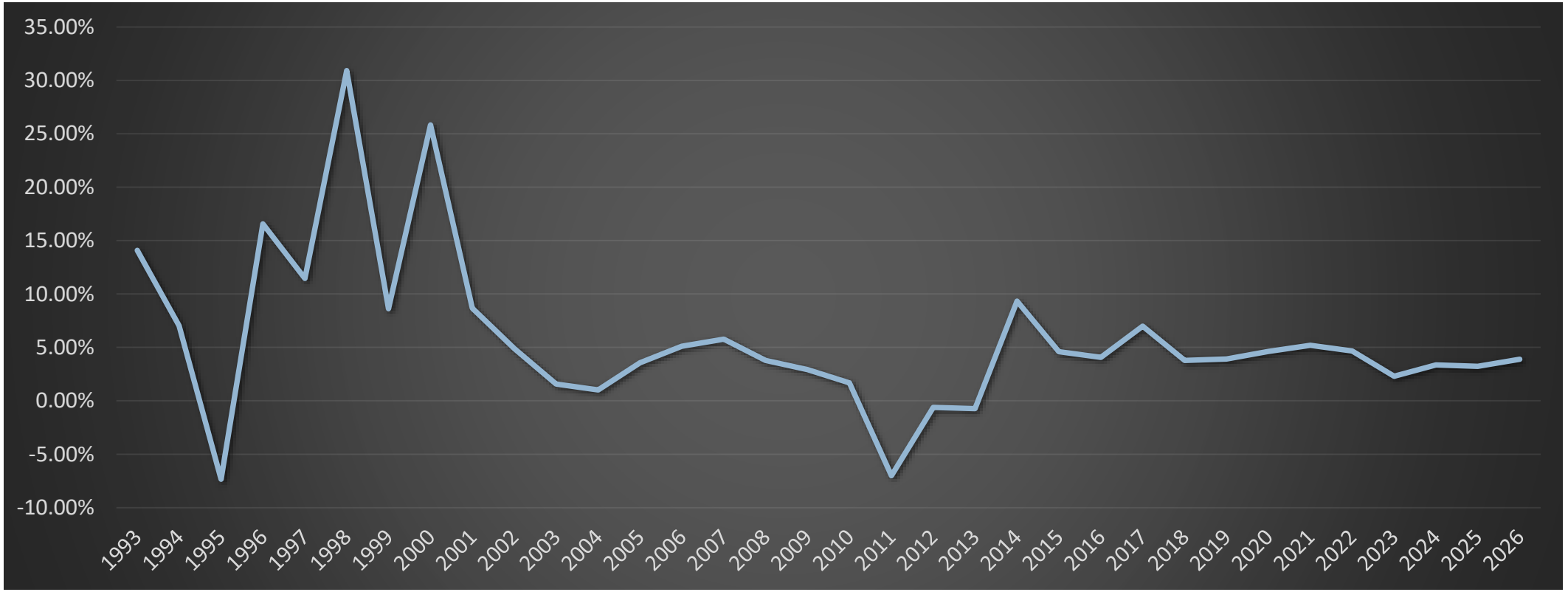
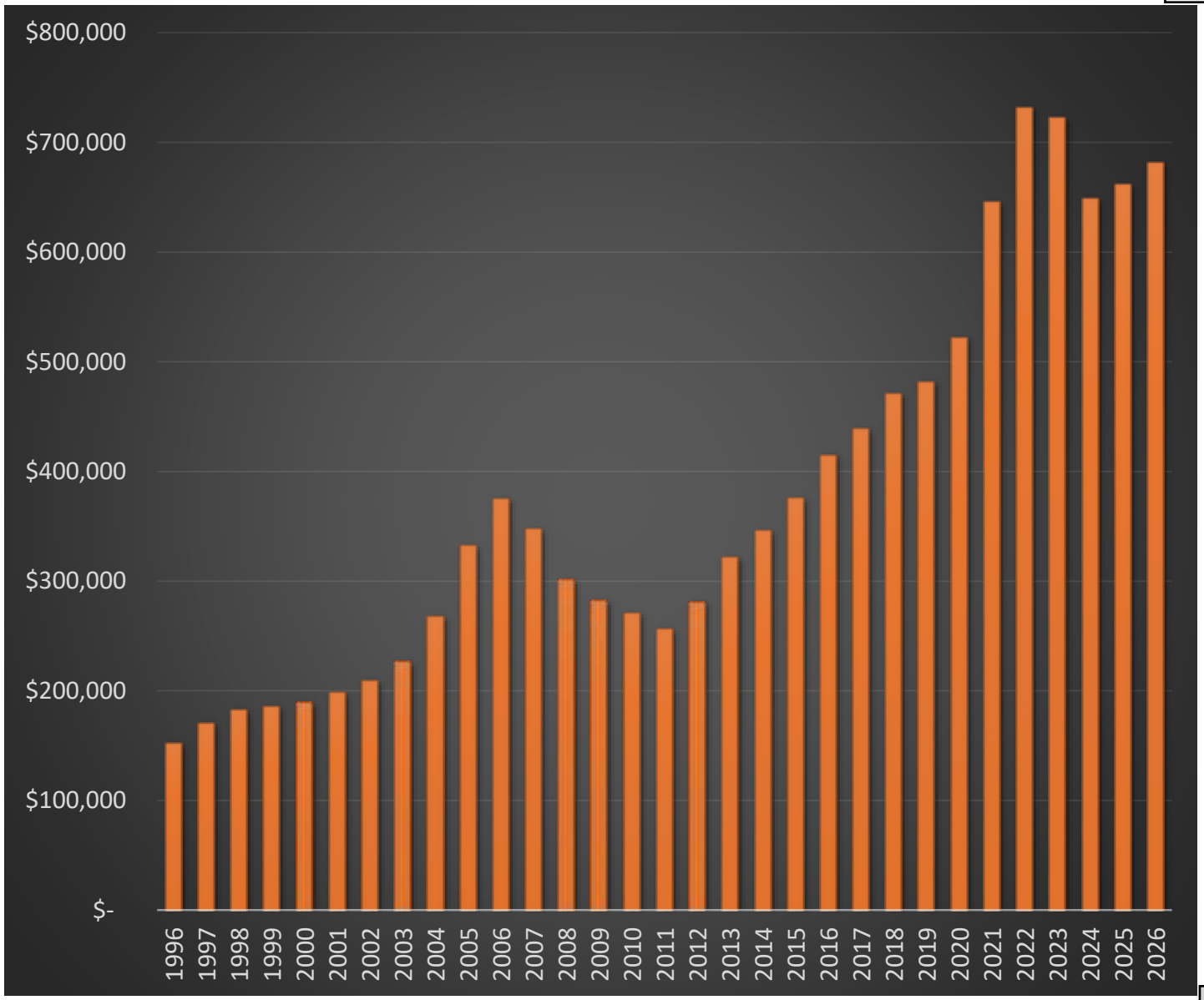
Tax Levy Growth



Home Values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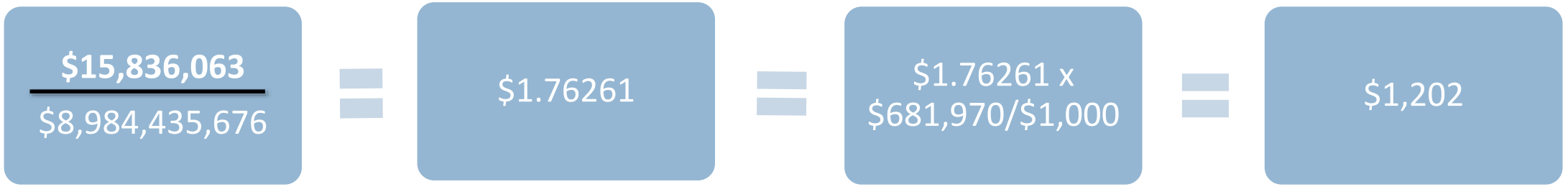
City Property Tax Formula



Assessed value is an estimate from the Assessor's Office but the final assessed value should be available soon

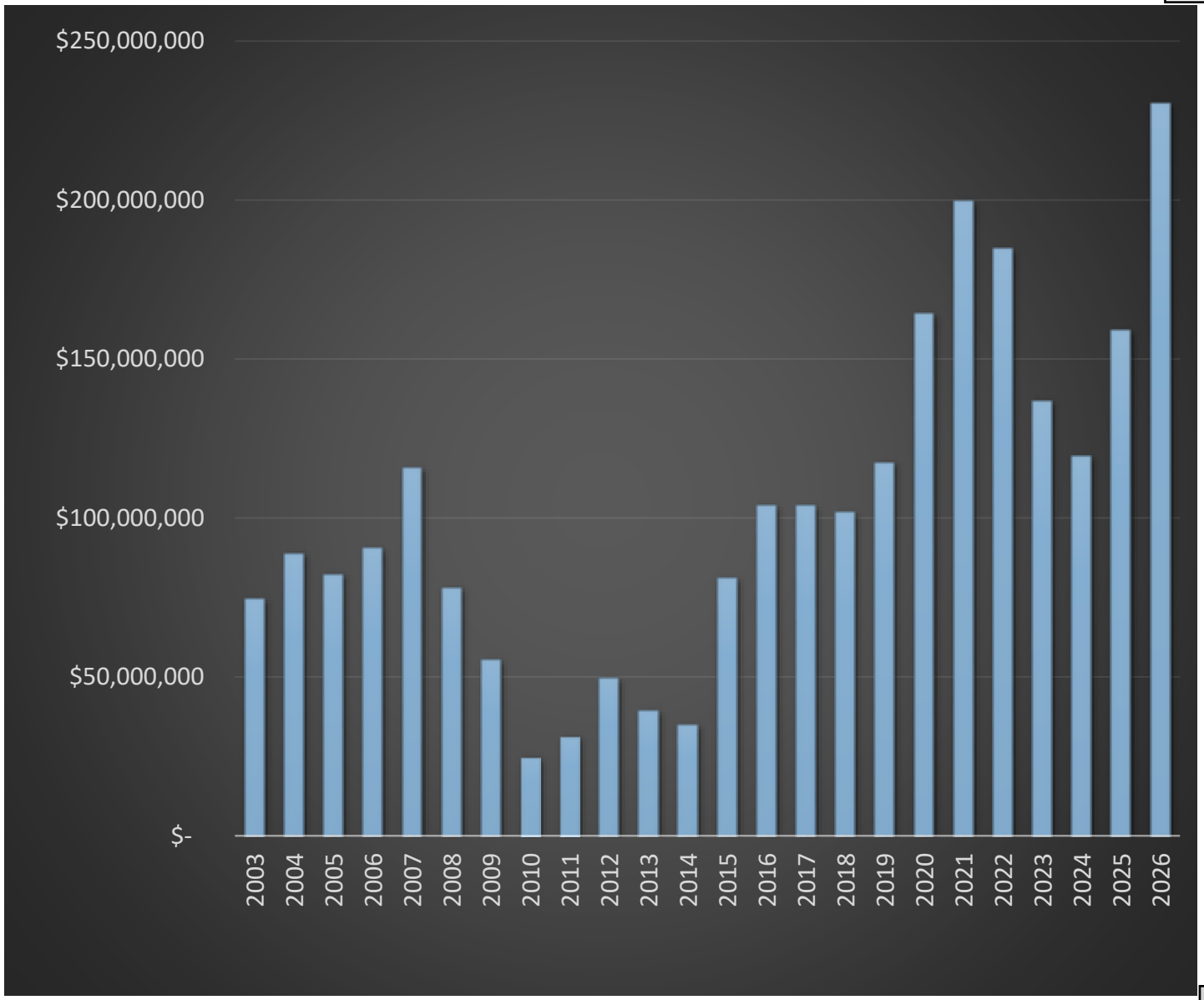
So is Property Tax only limited to 1%?

No, new construction can increase to tax collections.

- New construction is added on by the Assessor's Office with a cutoff typically in mid-summer.
- New construction is calculated by:

  Construction assessed value X prior year levy

New Construction Values



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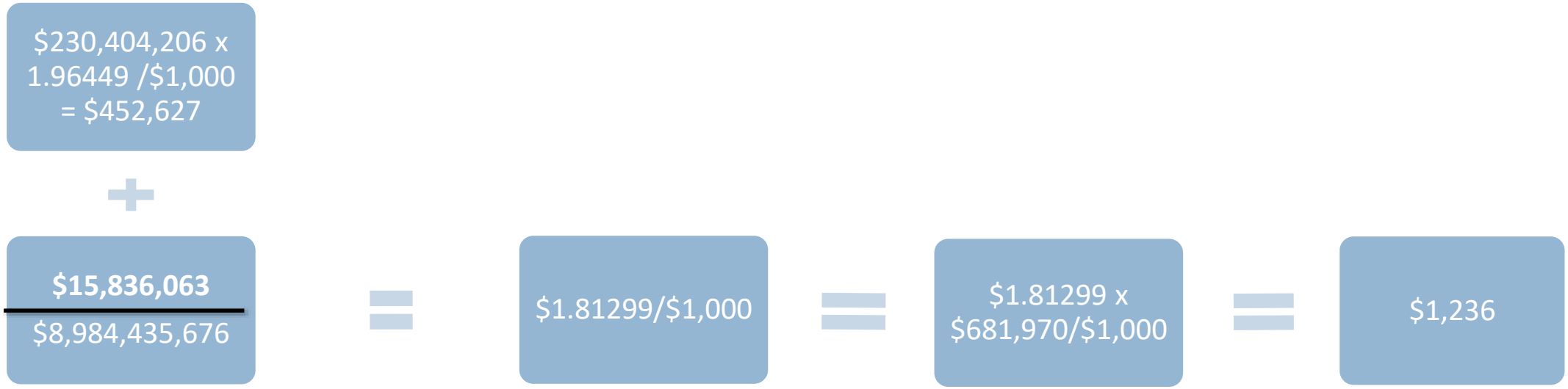
City Property Tax Formula



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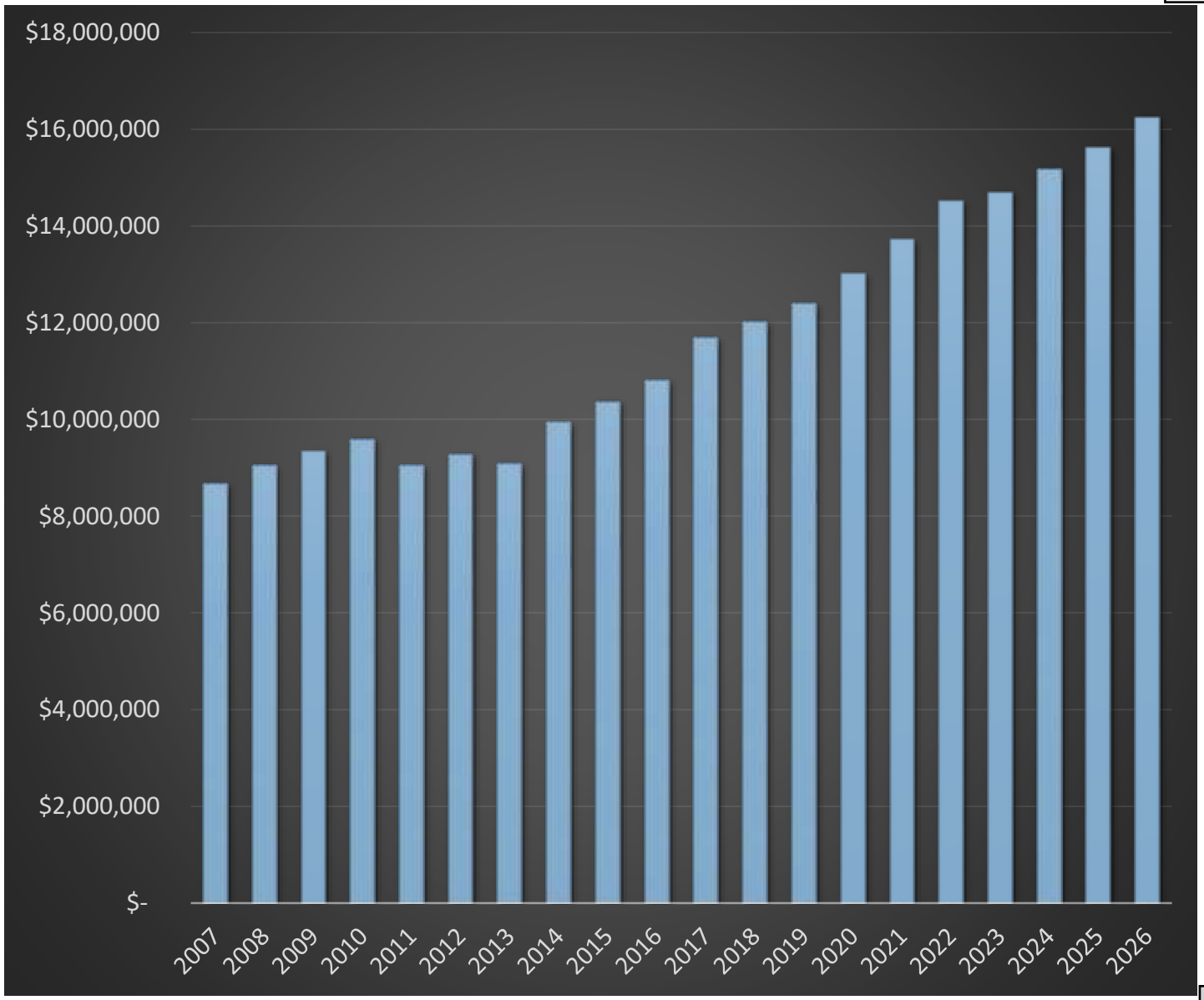
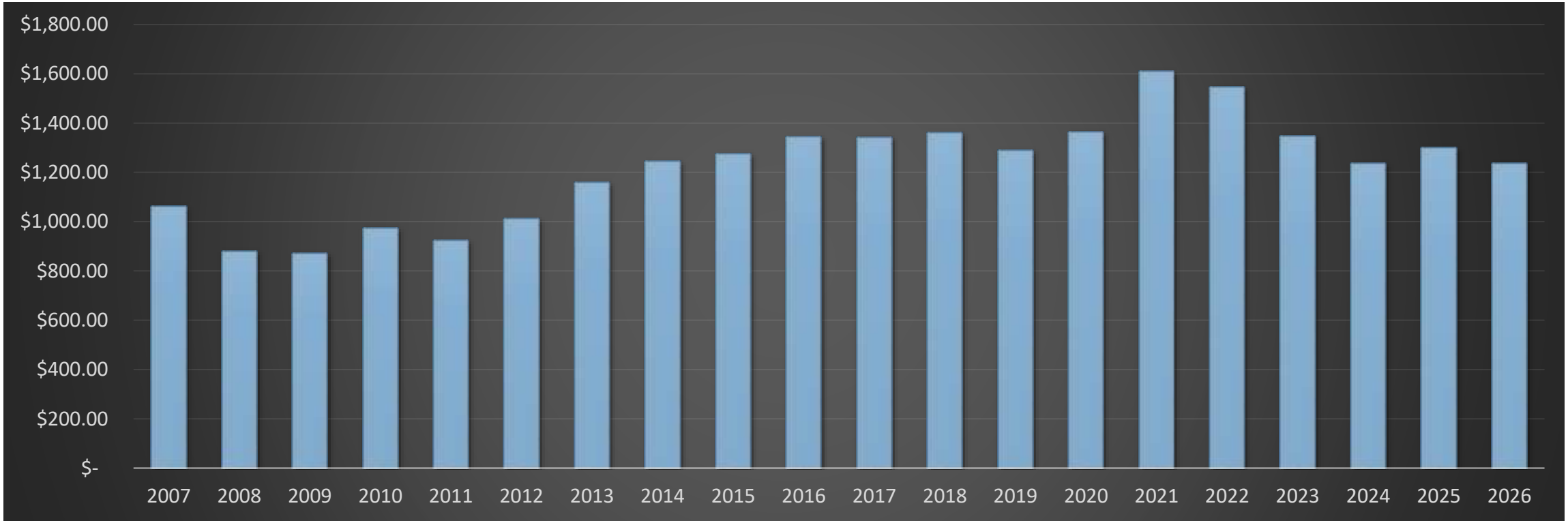
Tax Collections





City Tax Bill (Median Home Price)

Council's Consideration

1. Increase to lawful levy(1%) of $15,836,063

- Impact on average homeowner from prior year **decrease** of $64

2. Hold levy to 2025 levy rate at $15,679,270

($156,793 less to General Fund)

- Impact on average homeowner from prior year **decrease** of $76

2026 EMS Levy

- 2025 Levy increased by 1% or 37,084
- New Construction adds $105,984
- Tax Rate $0.42868/$1,000
- Tax Levy $3,851,466 (compared to $3,708,396 in 2025)
- Impact to taxpayer $292 - decrease of $12 compared to 2025

Fire Station Unlimited GO Bond Tax Levy

$26.3 million bond for 25 years to fund Fire and EMS Headquarter Station in downtown Camas

Approximate levy of $2,057,370 for annual debt service in 2026

Tax Levy Rate = $0.23/$1,000

Combined Camas Property Tax Levies for 2026 (*Estimated*)

General Fund Property Tax Levy $1.81

Camas EMS Levy $0.43

CWFD Unlimited GO Bond Levy $0.23

Total Camas Tax Levies for 2026 $2.47

Total Camas Tax Levies for 2025 $2.62

Staff Report

November 17, 2025 Council Workshop Meeting

Our Camas 2045 – Land Use Element
Presenter: Alan Peters, Community Development Director
Time Estimate: 30 minutes

Phone	Email
360.817.7254	apeters@cityofcamas.us

BACKGROUND: The City of Camas is conducting a periodic update to the Comprehensive Plan pursuant to the Growth Management Act (GMA). Under the GMA framework, the City must adopt a land use element and a future land use map that align with Clark County's adopted population, housing, and employment allocations. Clark County adopted these allocations on May 7, 2024, assigning Camas a 2045 population of 37,080 residents, 4,226 new housing units, and 11,615 jobs.

The purpose of the Land Use Element is to establish the overall pattern of future development, including the proposed distribution, location, and extent of future land uses in a manner that supports the 20-year population and employment projections. Council previously reviewed the draft preferred land use alternative on February 18, 2025. The current draft Land Use Element and draft preferred land use alternative were included in the draft *Our Camas 2045* plan published in July.

SUMMARY: The draft Land Use Element establishes the policy framework that will guide how Camas accommodates population and employment growth through 2045. It includes a vision statement, an overview of existing land uses, growth projections, proposed land use designations and maps, and a set of draft goals and policies.

Vision

In support of the overall *Our Camas* 2045 vision statement, the vision for the Land Use Element emphasizes maintaining community character while providing housing choices for all residents, supporting a thriving local economy, and strengthening neighborhood connections through walkable commercial hubs and improved multimodal access.

Camas embraces its small-town feel while responsibly managing growth, ensuring a prosperous and livable future for all. Camas provides a variety of housing options that meet the needs of all residents, while ensuring the town's charm and livability are sustained. Camas is home to a thriving economy and diverse businesses, affording residents ample employment opportunities and access to high wage jobs. Neighborhood commercial hubs connect residents to daily services and amenities through a network of sidewalks and bike lanes, improving access and connectivity.

Growth projections

Clark County has adopted a 2045 countywide population target of 718,154, an increase of 181,854 over current estimates. The County has allocated each jurisdiction a portion of this growth. Camas has been allocated 7,729 persons over the next 20 years for a 2045 population estimate of 37,080.

To meet the needs of this future population, Camas has been allocated 4,226 housing units and 11,615 jobs. The Land Use Element must demonstrate that the City's urban growth area (UGA) and capital plans have capacity to support this allocated growth.

Proposed land use

To achieve the City's vision and land use goals, the plan uses a series of land use designations that assign development types and densities across Camas. These include residential, commercial, mixed use, mixed employment, and industrial designations, along with parks and open space to support recreation and protect natural resources.

The draft preferred alternative focuses on increasing high-density residential capacity in areas with existing infrastructure and proximity to jobs and transit and increasing opportunities for economic development by allowing more employment diversity in existing industrial areas and providing additional employment lands throughout the City and its UGA.

The alternative includes a proposed UGA expansion of 83.79 acres near the North Shore Subarea that would bring the Port of Camas-Washougal's Grove Field into the UGA. It is anticipated that this area would be assigned a mixed employment zoning, allowing the Port to further develop Grove Field, providing additional employment capacity.

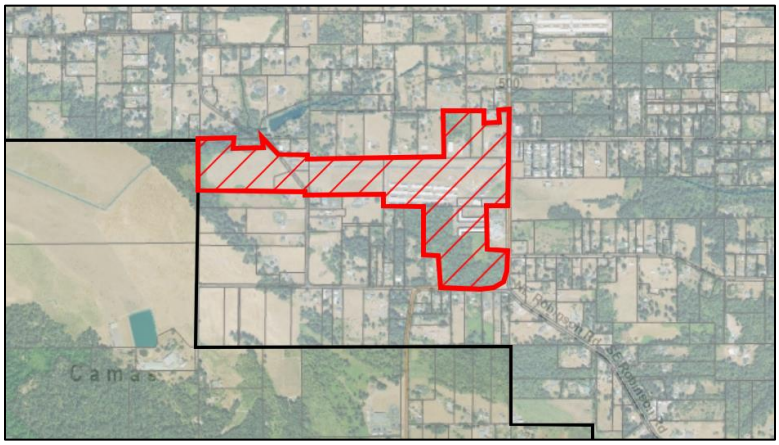


Figure 1: Port of Camas-Washougal UGA Expansion Request

Following Council discussion at the February workshop, a second UGA expansion of 161.2 acres near SE Nourse Rd and SE 283rd Ave was added to the draft preferred alternative map released in July 2025. This addition reflects Council's interest in studying the request further and allowing the public and reviewing agencies to provide input. The

area is currently designated agricultural land and is subject to the County's agricultural resource lands study. Any change would require both City Council action and Clark County approval of a de-designation. Including the area on the draft map is intended only to support analysis and outreach at this stage and does not represent a final decision regarding expansion of the Urban Growth Area. A copy of the Clark County Agricultural Lands Study is included in the meeting packet.

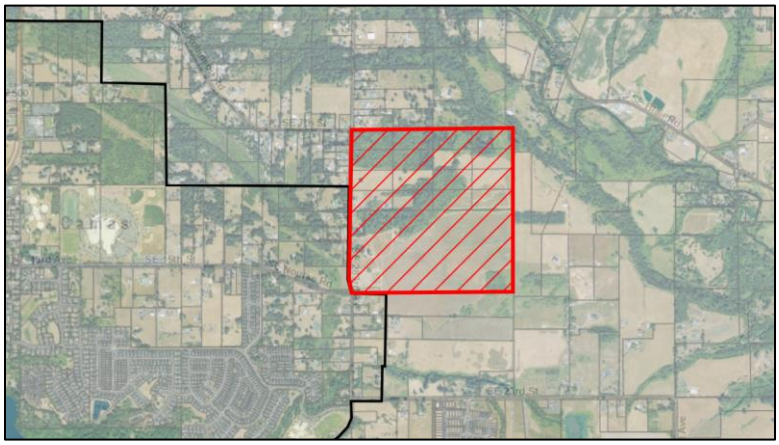


Figure 2: Nevin UGA Expansion Request

Goals and policies

The draft element includes six goals and 30 supporting policies related to citywide land uses, employment land, neighborhoods, natural environment, mixed-use areas, and design overlay areas. Collectively, these goals and policies will guide development patterns, promote efficient land use, support multimodal transportation connections, integrate land use with public facility planning, provide opportunities for diverse housing types, protect natural features, and implement the community's long-term vision.

Goal LU-1 Citywide Land Use
Maintain a land use pattern that respects the natural environment and existing uses while accommodating a mix of housing and employment opportunities to meet the City's growth projections in coordination with the capital improvement plan.

Goal LU-2 Employment Land
Create a diversified economy and serve Camas residents, businesses, and tourists by providing sufficient land throughout the City to support a variety of business types and employment opportunities.

Goal LU-3 Neighborhoods
Create vibrant, stable, and livable neighborhoods with a variety of housing choices that meet all stages in the life cycle and the range of affordability.

Goal LU-4 Natural Environment

Develop an interconnected network of parks, trails, and open space to enhance the quality of life for Camas residents and visitors and support and preserve wildlife corridors and natural resources.

Goal LU-5 Mixed-Use Areas
Foster economically and socially diverse mixed-use neighborhoods that meet the multi-modal transportation, housing, employment, education, recreation, and health needs of the community.

Goal LU-6 Design Overlay Areas
Create attractive and welcoming areas in the City and distinguish Camas from adjacent jurisdictions through the development of design overlays.

Next steps

The *Our Camas 2045* Community Summit #3 is an ongoing phase of engagement to receive feedback on each of the draft plan elements. A two-week window focusing on the Land Use Element will kick off on November 24, 2025, and continue through December 5, 2025. Feedback received Community Summit #3 will inform the next draft of the Land Use Element to be released early next year.

The Clark County Planning Commission and Council are currently working towards selecting a preferred alternative, with a final decision due next February. The county has prepared a draft environmental impact statement (EIS) to study the proposed growth alternatives. The County will also need to decide on whether any agricultural lands will be de-designated as part of this periodic update. This decision, informed by the recent Agricultural Lands Study, will determine whether cities can expand their UGAs into these areas.

BENEFITS TO THE COMMUNITY: The draft Land Use Element supports the *Our Camas 2045* vision statement while providing adequate land capacity for future residential and employment growth through 2045 while preserving community character, expanding housing opportunities, and supporting economic vitality.

STRATEGIC PLAN: The draft element best supports the Strategic Plan's "Economic Prosperity" priority by ensuring a supply of developable employment land and supporting balanced employment and housing growth. The draft element would expand the Camas urban growth area for additional employment land and provide for housing options for all income levels and demographic needs.

POTENTIAL CHALLENGES: Countywide growth alternatives are decided by the Clark County Council. The County Council is currently reviewing various alternatives in an EIS and will be selecting a preferred alternative early next year. Their decision – particularly

on UGA expansions – may require additional changes the City's land use map. Continued coordination between the City and County processes will be essential.

BUDGET IMPACT: Funding for development of the Land Use Element has been included in the City's biennial budget and has been supported by grant funding from the Department of Commerce. Proposed expansions of the urban growth area may include capital facility implications which will be studied in the City's updates to the transportation, water, and sewer system plans.

RECOMMENDATION: Discuss the draft Land Use Element and provide feedback to staff.

ourCamas 2045

Land Use

04

Land Use Element

The land use element is designed to support development that adheres to the City's vision to ensure Camas' future is as bright as its past.

04. Land Use

Vision

Camas embraces its small-town feel while responsibly managing growth, ensuring a prosperous and livable future for all. Camas provides a variety of housing options that meet the needs of all residents, while ensuring the town's charm and livability are sustained. Camas is home to a thriving economy and diverse businesses, affording residents ample employment opportunities and access to high wage jobs. Neighborhood commercial hubs connect residents to daily services and amenities through a network of sidewalks and bike lanes, improving access and connectivity.

Land Use Overview

The City of Camas is home to great schools, family-wage jobs, high quality neighborhoods, and an abundance of open space and recreational amenities. Camas has grown into a dynamic, vibrant city with diversified employment opportunities and services that cater to its residents' various needs. In 2025, Camas maintains its small town charm and character, and downtown remains the heart of the City with a mix of restaurants, shops, professional offices, and residential development. The Grass Valley area is home to several national and international technology and manufacturing firms. Newer residential development has occurred recently in the Green Mountain area, and planned transportation improvements in the North Shore area will improve connectivity and provide better transportation options throughout the City.

The land use element is designed to support development that adheres to the City's vision to ensure Camas' future is as bright as its past. The GMA identifies the land use element as the foundation of the comprehensive plan. GMA outlines the framework by which the plan will be implemented and establishes land use designations to accommodate the City's population and employment projections. The development of land in accordance with the goals and policies included in the land use element will ensure the achievement of an appropriate balance of public facilities, housing, employment, services, and recreational uses throughout the City.

Population Projections

GMA requires that each jurisdiction accommodate its share of the region's growth. The City of Camas is expected to have a population of 37,080 by 2045 (based on the County adopted growth rate of 1.2 percent per year), a 7,729-person increase from the 2023 population of 29,352. During the same period, Camas is expected to add 13,658 jobs.

Land Use Designations

In order to ensure the City's vision and land use goals are achieved, land use designations are used to assign a variety of development uses and building densities to land throughout the City. The plan identifies areas for residential, commercial, mixed use, mixed employment and industrial development. The plan also identifies areas for parks and open space to support recreation and enhance natural areas, including habitat and wildlife corridors.

Table 1 Land Use Designations

Comprehensive Plan Designation	Corresponding Zones	Total (Acres)[1]
Residential Low	Residential 15,000 (R-15)	407
	Residential 12,000 (R-12)	27
	Residential 10,000 (R-10)	280
	Residential 7,500 (R-7.5)	151
	Residential 6,000 (R-6)	19
	North Shore Lower Density (LD-NS)	145
	Downtown Residential (R-DT)	68
Residential Medium	Multi-Family 10 (MF-10)	37
Residential High	Multi-Family 18 (MF-18)	41
	Multi-Family 26 (MF-26)	33
	Multi-Family 34 (MF-34)	6
	North Shore Higher Density (HD-NS)	109
Mixed Use	Mixed Use (MX)	141
	North Shore Mixed-Use (MX-NS)	85
	Downtown Mixed-Use Low Rise (MX-LR)	41
	Downtown Mixed-Use Mid Rise (MX-MR)	55
Mixed Employment	Mixed Employment (ME)	235
	North Shore Mixed Employment (ME-NS)	99
Commercial	Neighborhood Commercial (NC)	2
	Community Commercial (CC)	63
	North Shore Commercial (C-NS)	54
	Regional Commercial (RC)	298

	Historic Main Street Core (HMSC)	17
Industrial	Heavy Industrial	545
Parks and Open Space	Neighborhood Park (NP) Special Use Park (SU) Open Space (OS)	1,343

[1]Total acres within each zoning designation are gross acres and inclusive of rights-of-way and infrastructure.

Overlays

In addition to the land use designations listed in Table 1, land use overlays further define appropriate uses and development standards for particular areas within the City. Overlays in Camas include an Airport Overlay and a Design Overlay. Development within all overlay areas must comply with the goals and policies of the underlying land use designation and the specific standards included in the overlay.

The Airport Overlay area applies to land adjacent to Grove Field, an airport owned and operated by the Port of Camas-Washougal and located northeast of Lacamas Lake. Grove Field adjoins the City's UGA and is proposed to be included in the UGA with this update. The Airport Overlay is designated to ensure land uses adjacent to the airport are compatible with air traffic and do not interfere with safe air navigation. For example, the comprehensive plan designation of lands adjacent to the airport is generally Mixed Employment, rather than residential, and the Airport Overlay area restricts uses tending to have higher concentrations of people, such as schools or hospitals.

The Design Overlay is a new overlay with the 2025 update and replaces the Gateways and Corridors Overlay included in the prior plan. The Design Overlay generally applies to the following locations. The specific extents of the overlay are included on the Camas Zoning Map.

- 6th Avenue
- 3rd Avenue
- Everett Street
- 38th Avenue
- Lake Road
- Green Mountain - Goodwin
- Brady Road
- Union Street
- Parker Street

The Design Overlay is intended to enhance the walkability, pedestrian experience, and design of the corridors it covers. Development/redevelopment within a designated Design Overlay must adhere to the Design Overlay goals and policies included in this element. See Goal LU-6 and Policies LU-6.1 – 6.7.

Figure 2 Comprehensive Plan Map

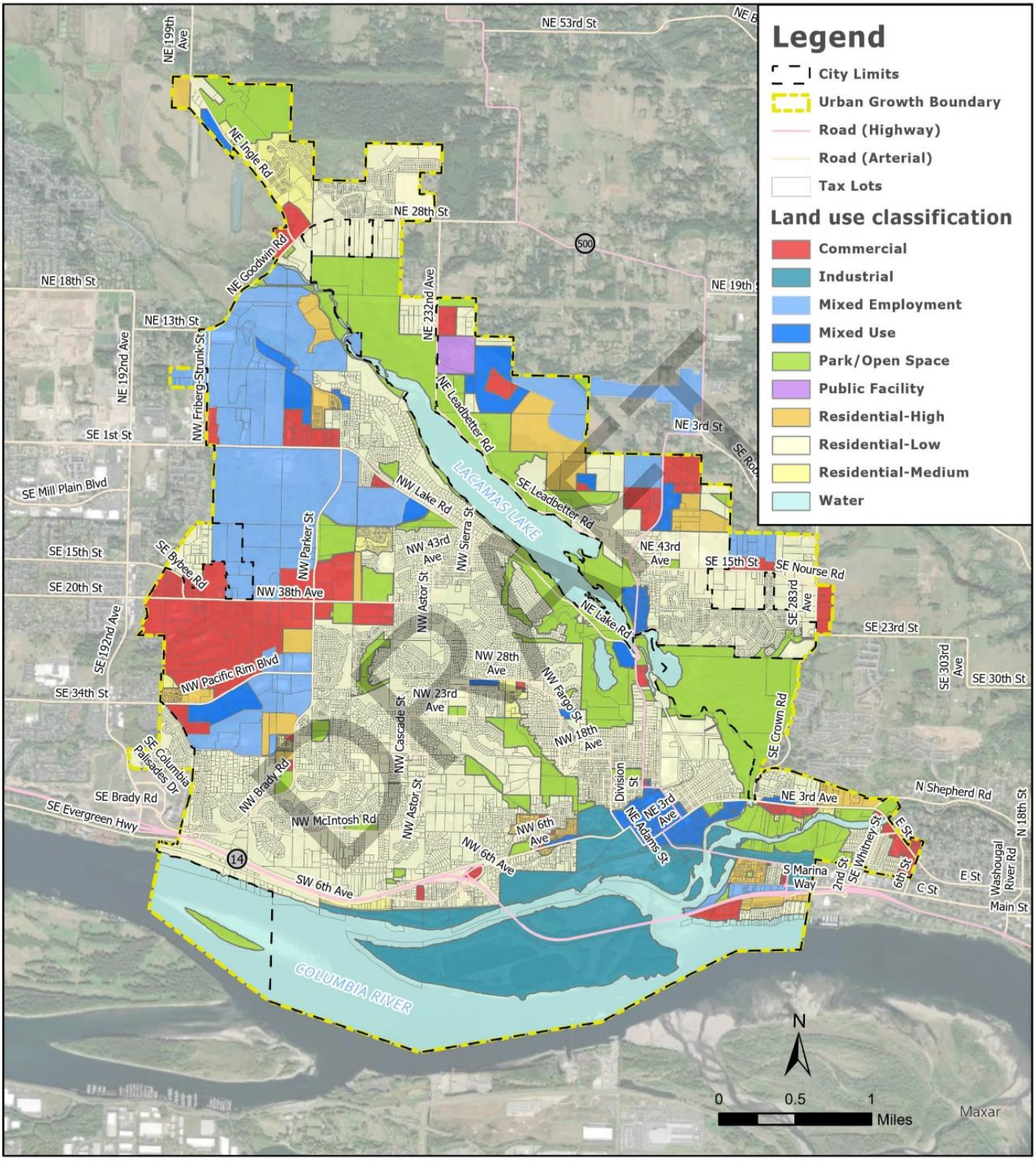
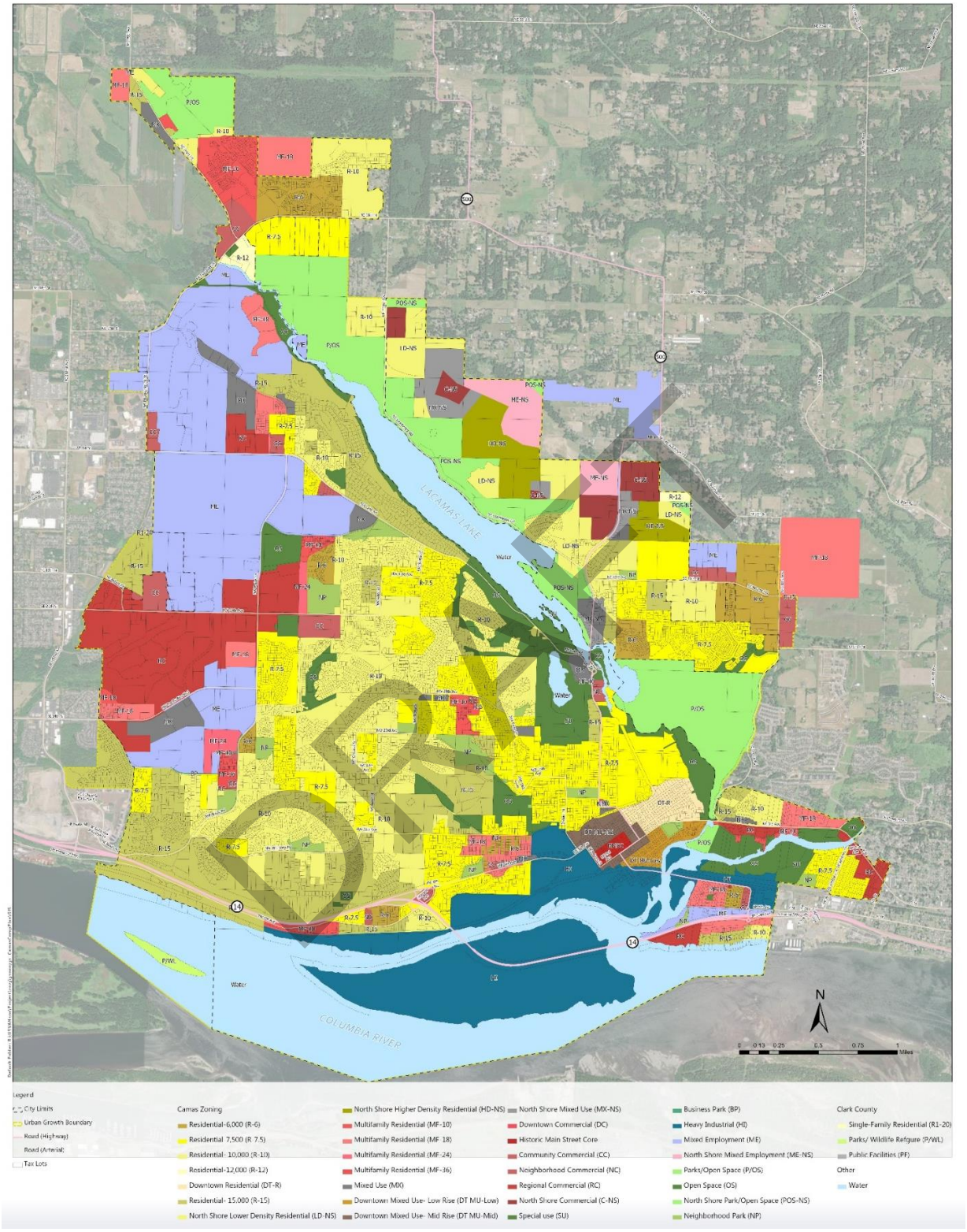


Figure 3 Zoning Map



Land Use Goals and Policies

Goal LU-1 Citywide Land Use

Maintain a land use pattern that respects the natural environment and existing uses while accommodating a mix of housing and employment opportunities to meet the City's growth projections in coordination with the capital improvement plan.

Policy LU-1.1 Ensure the appropriate mix of commercial, residential, and industrial zoned land accommodates the City's share of the regional population and employment projections for the 20-year planning horizon.

Policy LU-1.2 Coordinate with Clark County, the state, and special districts to identify future needs for essential public facilities such as airports, state education facilities, state and regional transportation facilities, state and local correctional facilities, solid waste handling facilities, regional parks and others as identified in RCW 36.70A.200. (See policies ED-3.1, 3.2, and 3.3 regarding Grove Field airport, policy TR-2.1 regarding transportation, and policy PFS-4.27 regarding solid waste.)

Policy LU-1.3 Implement design standards for new development, redevelopment, and infill that consider the surrounding built and natural environments and support a natural transition between uses.

Policy LU-1.4 Ensure that park and recreation land is distributed equitably throughout the City and work to achieve park and continuous trail corridors from Green Mountain to the Columbia River. (See policies PFS-2.1 and 2.4 regarding increasing connectivity to natural areas and continuous trail around Lacamas Lake.)

Policy LU-1.5 Ensure adequate public facilities, including roads, emergency services, utilities, and schools, exist to serve new development, and mitigate potential impacts to current residents. Establish and maintain policies for impact fees for new development.

Policy LU-1.6 Ensure consistency with County-wide planning policies.

Policy LU-1.7 Evaluate and improve design and building standards for new and redeveloped sites in high-risk natural hazard areas.

Policy LU-1.8 Incorporate sustainable and low climate impact design into development codes and standards.

Policy LU-1.9 Encourage high density concentrations of housing, commercial, and other uses needed in daily life along major transportation corridors to support the reduction in vehicle miles traveled and opportunities to increase physical activity.

Policy LU-1.10 Protect the viability of the airport as a significant economic resource to the community by encouraging compatible land uses and densities, and reducing hazards that may endanger the lives and property of the public and aviation users consistent with state laws RCW 36.701A.510 and RCW 36.70547.

Goal LU-2 Employment Land

Create a diversified economy and serve Camas residents, businesses, and tourists by providing sufficient land throughout the City to support a variety of business types and employment opportunities.

Policy LU-2.1 Protect employment land to ensure an adequate supply of commercial and industrial land to meet 20-year employment projections. Encourage a balance of new and existing commercial, light industrial, knowledge-based business, medical, and high-tech uses.

Policy LU-2.2 Encourage mixed-use developments (residential and commercial) that support adjacent uses, reduce vehicle miles traveled, and balance job creation.

Policy LU-2.3 Implement development and landscaping standards to ensure industrial development and other employment lands integrate with the surrounding neighborhoods.

Goal LU-3 Neighborhoods

Create vibrant, stable, and livable neighborhoods with a variety of housing choices that meet all stages in the life cycle and the range of affordability.

Policy LU-3.1 Encourage connectivity between neighborhoods and adjoining natural areas and trails to increase access to recreation amenities. (See policies PFS-2.1 and 2.2)

Policy LU-3.2 Discourage exclusive neighborhoods, privacy walls, and gated communities.

Policy LU-3.3 Provide commercial zoning within a half mile of residential areas for the development of food retailers (grocery stores and farmers' markets) to improve food access.

Goal LU-4 Natural Environment

Develop an interconnected network of parks, trails, and open space to enhance the quality of life for Camas residents and visitors and support and preserve wildlife corridors and natural resources.

Policy LU-4.1 Maintain development regulations that encourage the preservation of trees and natural areas, including the use of density bonuses and other tools to protect sensitive areas and encourage tree replacement. (See policy NE-4.1)

Policy LU-4.2 Support the purchase and preservation of open space by the City and private owners. Encourage careful consideration and integration of the natural environment in planning activities to maintain the park-like setting of Camas.

Policy LU-4.3 Encourage connectivity and increase access to regional trails throughout the City to support multi-modal transportation and physical activity. (See policies PFS-2.1)

Policy LU-4.4 Protect the quality and quantity of groundwater used for public water supplies through conservation of water usage and treatment of runoff.

Goal LU-5 Mixed-Use Areas

Foster economically and socially diverse mixed-use neighborhoods that meet the multi-modal transportation, housing, employment, education, recreation, and health needs of the community.

Policy LU-5.1 Mixed-use developments should be unique to the area in which they are located, encourage small business development, provide a mix of housing types to ensure affordability, increase pedestrian and transit connections, and include design that is sensitive to the natural environment.

Policy LU-5.2 Develop mixed-use areas that are oriented to the public street and scaled and designed to integrate with surrounding land uses.

Policy LU-5.3 Create a mixed-use zone that requires developments to include a minimum percentage of commercial space in both vertical and horizontal mixed-use settings.

Goal LU-6 Design Overlay Areas

Create attractive and welcoming areas in the City and distinguish Camas from adjacent jurisdictions through the development of design overlays.

Policy LU-6.1 Encourage development and redevelopment along the design overlay corridors that respects the historic character of the areas, improves pedestrian mobility/safety, and supports small-scale retail and commercial services.

Policy LU-6.2 Encourage development of commercial uses and multi-family residential within the NE 6th Avenue and NE 3rd Avenue design overlay corridors to support downtown businesses (such as through the Downtown subarea plan). Consider rezoning low-density residential land to support the downtown area. Consider rezoning low-density residential land to support the downtown area.

Policy LU-6.3 Orient building entrances toward the street and provide pedestrian connections from building entrances to the sidewalk. Encourage landscaping, rather than parking, between the building and the street to create a welcoming streetscape.

Policy LU-6.4 Collaborate with partners to support community events, public art, and infrastructure investments that celebrate cultural heritage, provide community amenities, and strengthen community branding. Develop area identities through events, festivals, signage, and other improvements that help establish or enhance existing character within the overlay areas.

Policy LU-6.5 Encourage the designation and development of design overlay features in strategic areas to create a distinct pedestrian scale identity and attract visitors.

Policy LU-6.6 Identify streets in the design overlay areas as public places to encourage pedestrian and bicycle mobility and to reinforce the connection between the corridors and the surrounding neighborhoods.

Policy LU-6.7 Improve and increase wayfinding signage in design overlay areas to nearby recreational and other amenities.

ourCamas 2045

DRAFT

Preferred Alternative Land Use Map

Land Use Classification

- residential-low
- residential-medium
- residential-high
- commercial
- mixed use
- mixed employment
- industrial
- park/open space
- public facility
- water

- Urban Growth Area
- City Limits

0 0.25 0.5 Miles

N W E S

Note: Features shown on this map were collected from multiple sources and are presented as-is. The City of Camas does not guarantee accuracy or completeness and assumes no liability for errors, omissions, or inaccuracies in the information.

7/13/2025

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City of Camas WASHINGTON

ECOnorthwest

November 2025

Clark County Agricultural Lands Study

Clark County Planning & Development Department

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ECOnorthwest
IMPACT THROUGH INSIGHT

Acknowledgments

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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.

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Table of Contents

1. Introduction 1

Background 1

Purpose 1

Policy Context 2

Organization of this Report 3

2. Methods and Analysis 5

Establishing the Study Area 5

Identify the Agricultural Land Base 8

Urban Growth Characteristics 9

Agricultural Production Capabilities 16

Methodology to Define the Agricultural Land Base 32

Analysis of Indicators of Long-term Commercial Significance for Agriculture 37

Prime and Unique Soils 38

Public Facilities 41

Tax Status 44

Availability of Public Services 47

Proximity to Urban Growth Areas 49

Predominant Parcel Size 51

Land Use Settlement Patterns 53

Intensity of Nearby Land Uses 56

History of Land Development Permits Issued Nearby 56

Land Values Under Alternative Uses 57

Proximity to Markets 58

Water Rights 58

Food Security 61

Key Findings 62
Data Sources 74
Appendix A. Case Law Review 75
Appendix B. Comparison Review of Agricultural Land Study from Peer Counties 79
Appendix C. Public Engagement Summary 90

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

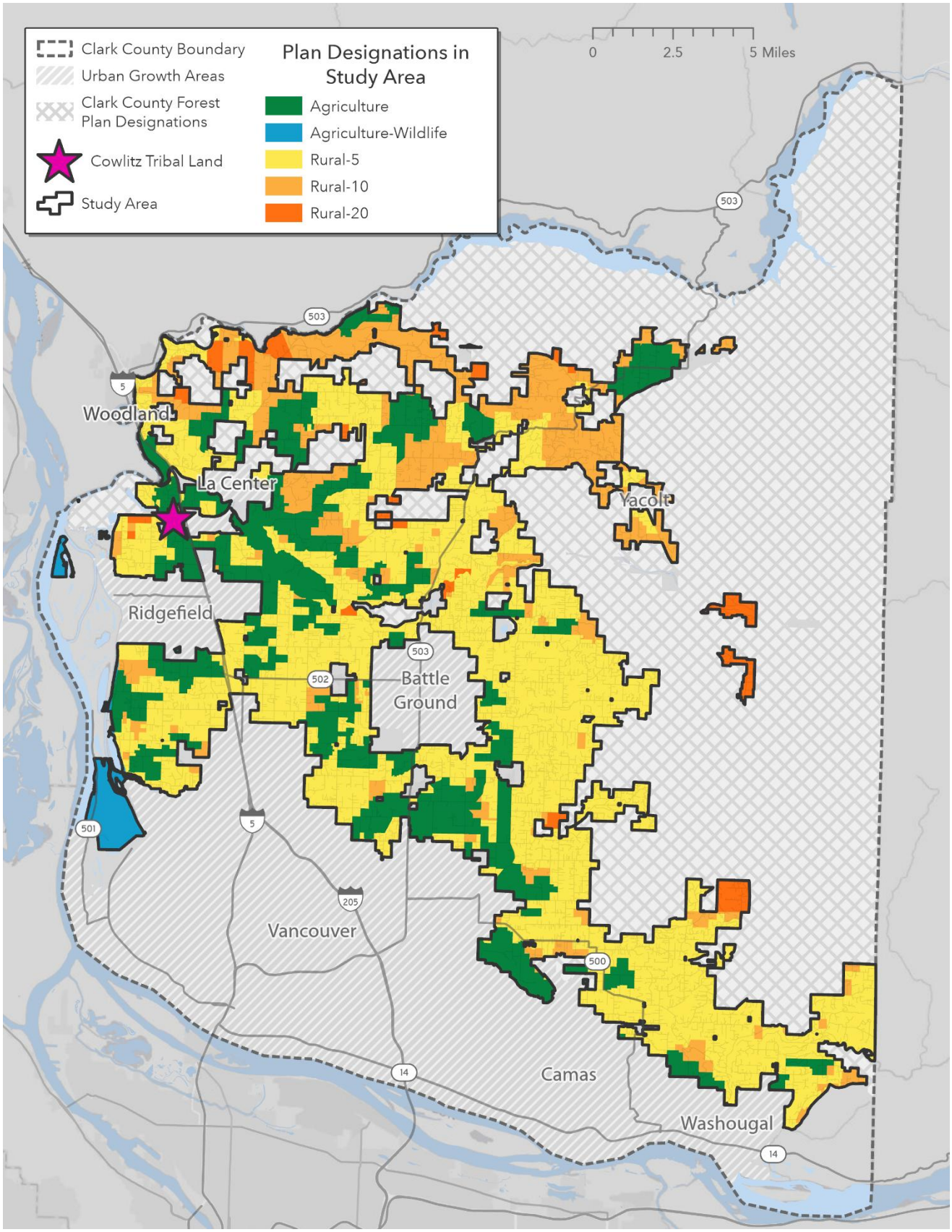
[9] *Washington Administrative Code* (WAC). § 365-190-050(3). https://app.leg.wa.gov/wac/default.aspx?cite=365-190-050

- 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.

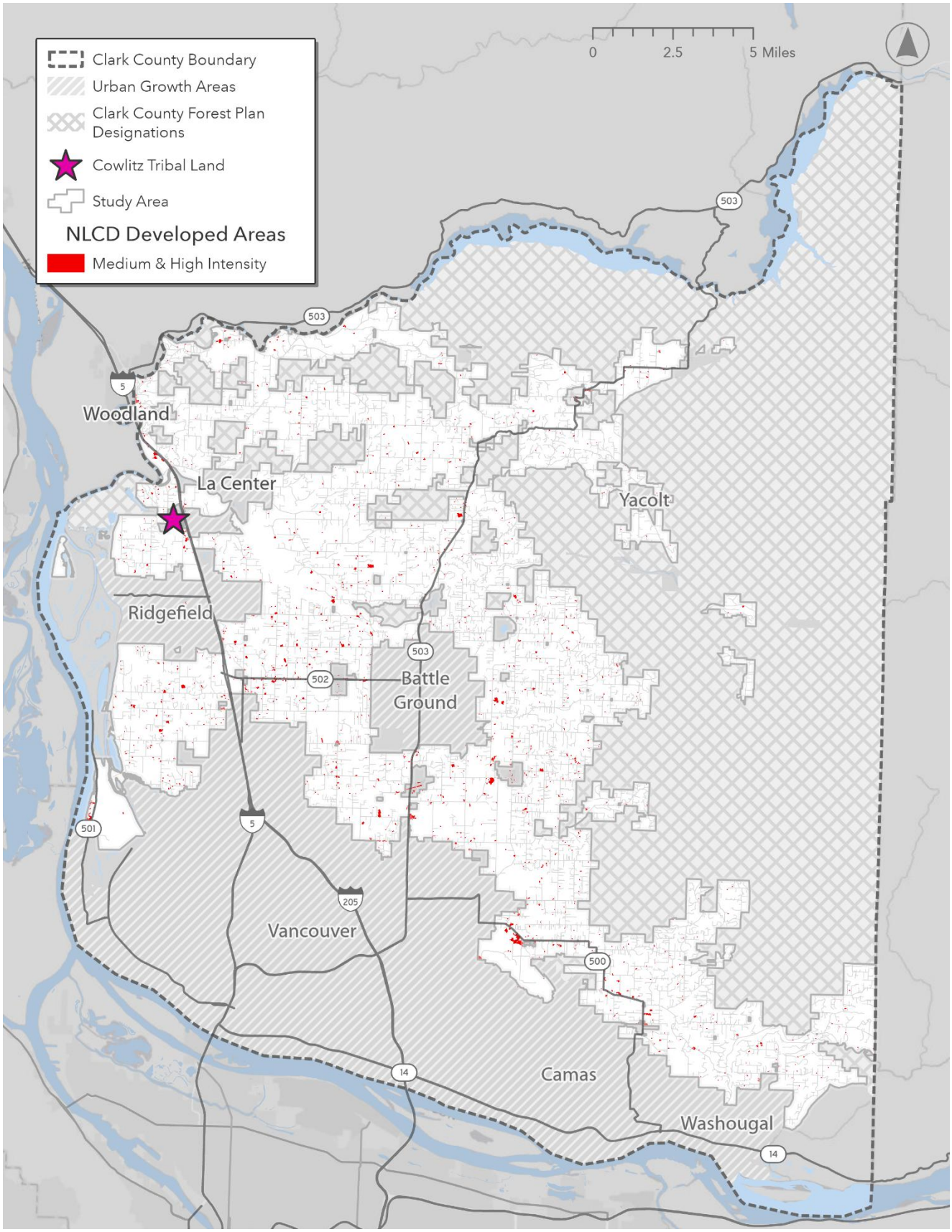
Existing adopted UGAs were automatically excluded from the analysis because they meet the standard of "characterized by urban growth." This includes both incorporated municipal lands and unincorporated lands within adopted and approved UGA boundaries. These areas outside of County plan designation jurisdiction 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.

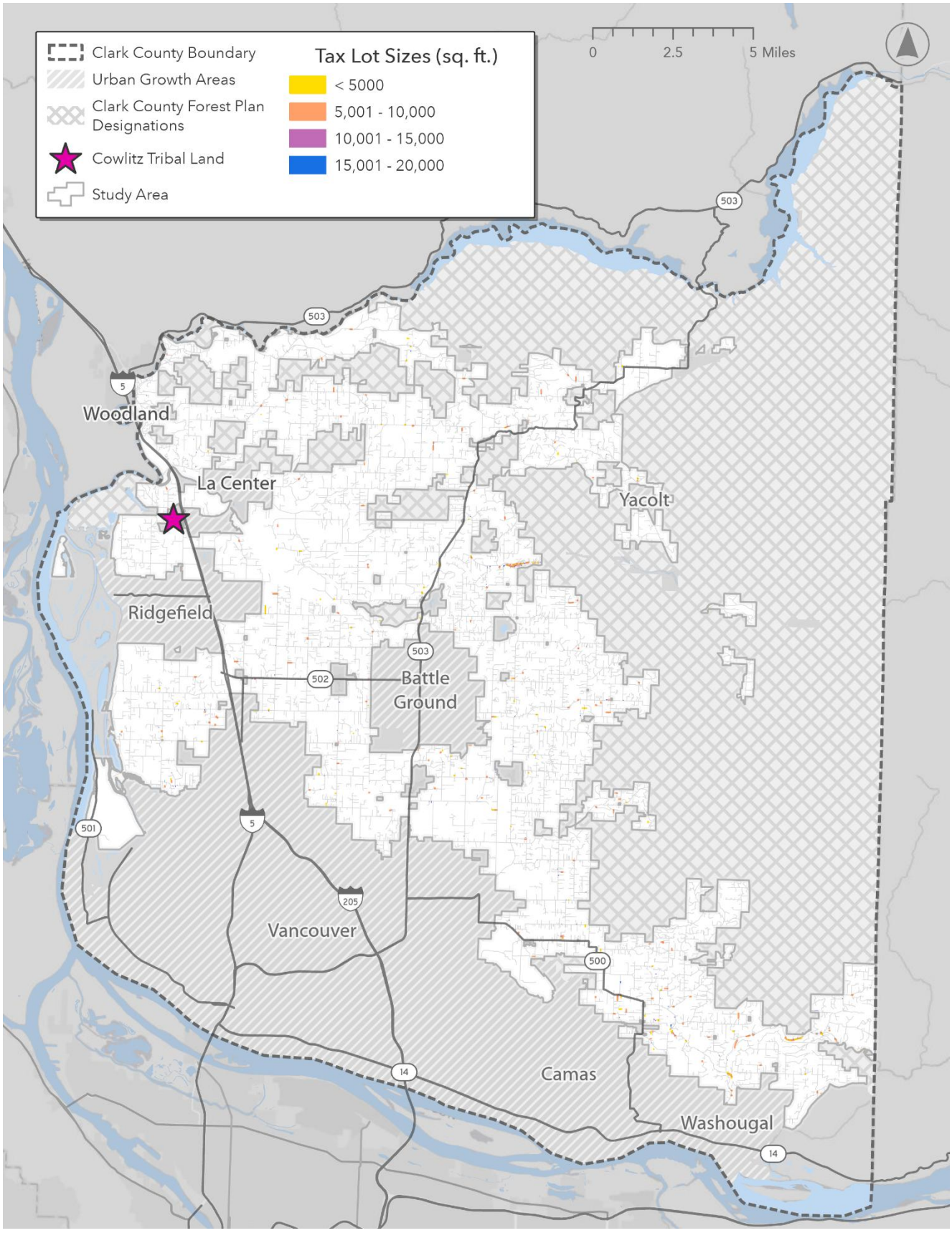
Exhibit 3. National Land Cover Database - Medium and High Intensity Development



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.

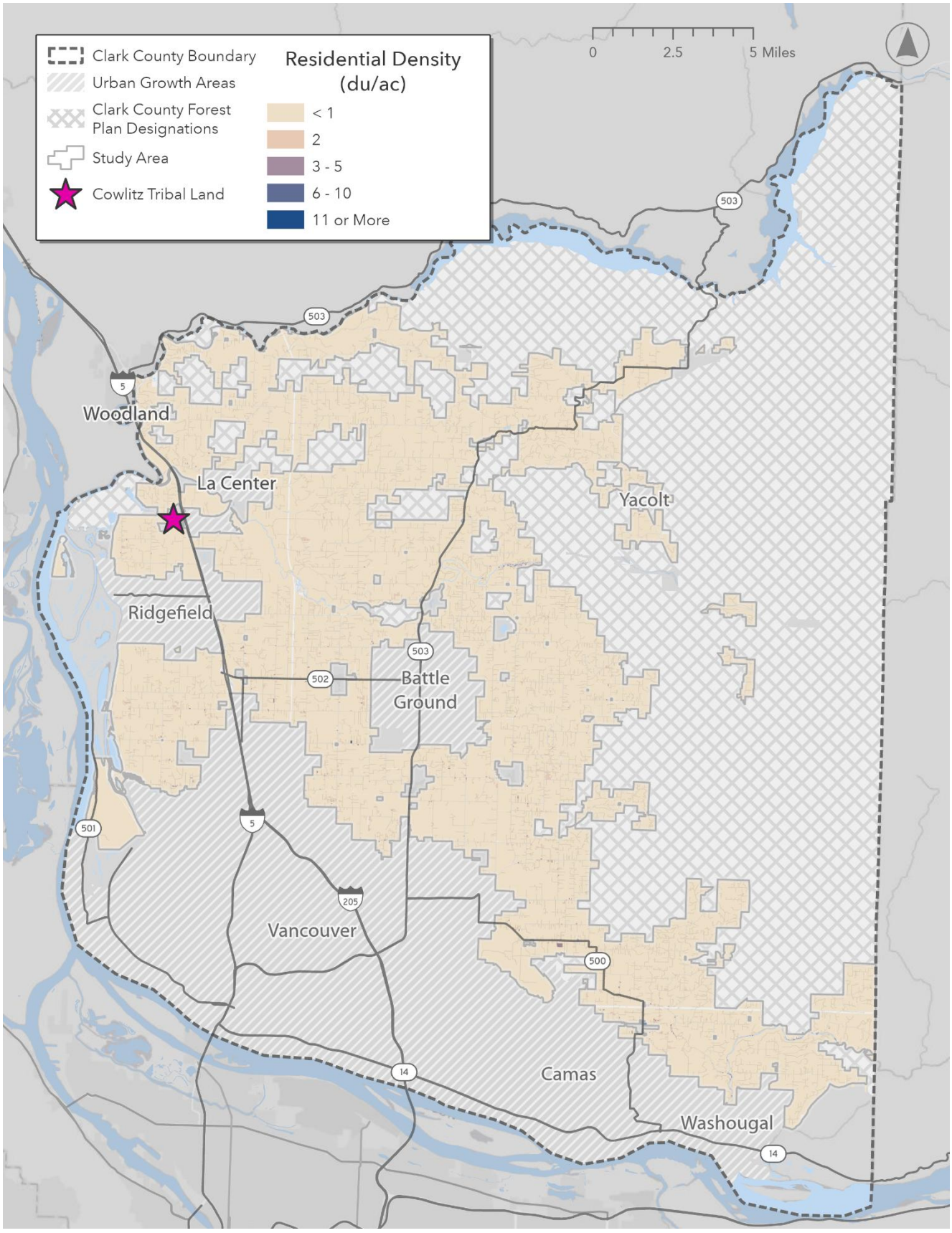
Exhibit 4. Tax Lot Size as Indicator of Urban Growth



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

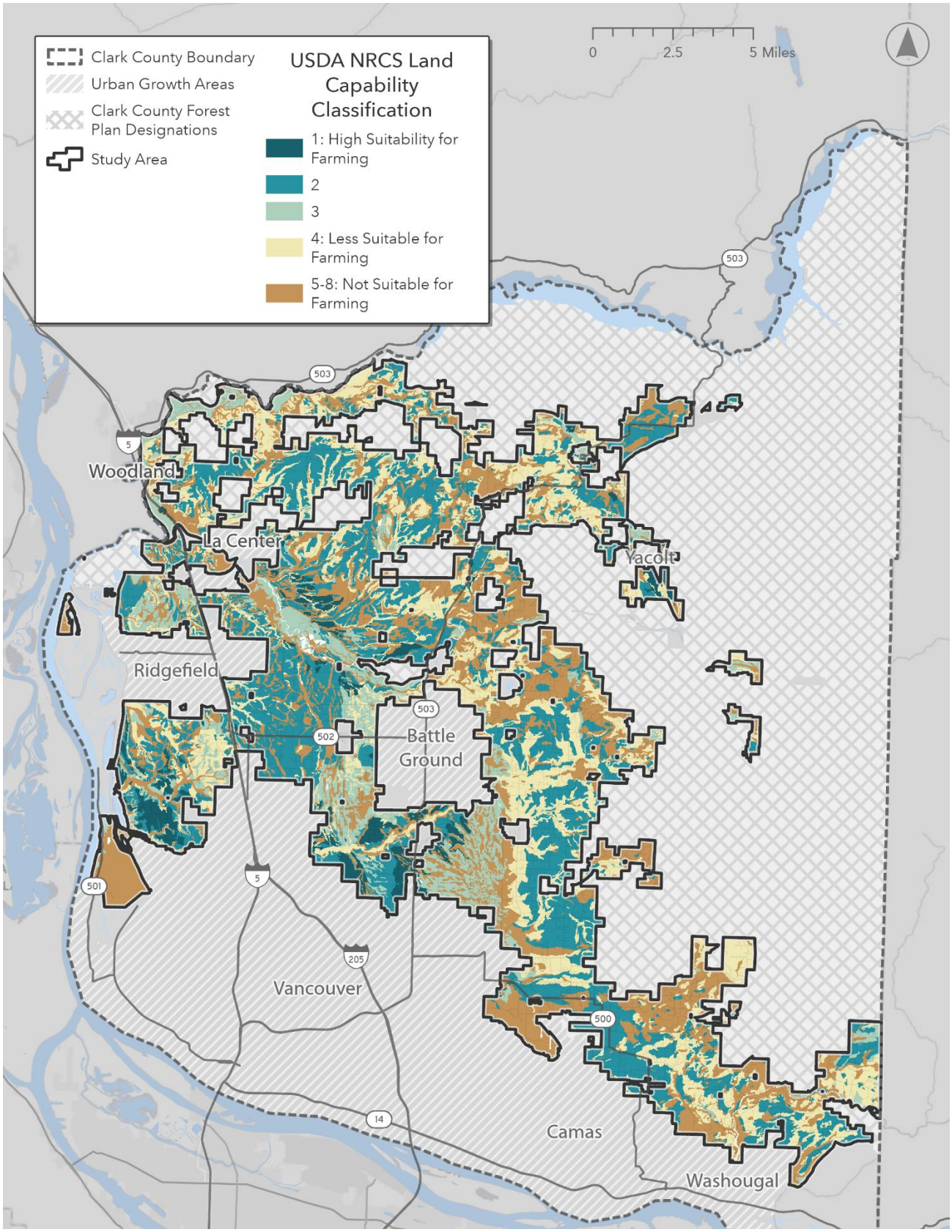
To assess the agricultural capability of soils within the study area, the analysis explored three different interpretive products from the USDA NRCS Soil Survey Geographic (SSURGO) database. These datasets were reviewed to determine how to best measure the physical capacity of land to support agriculture, 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

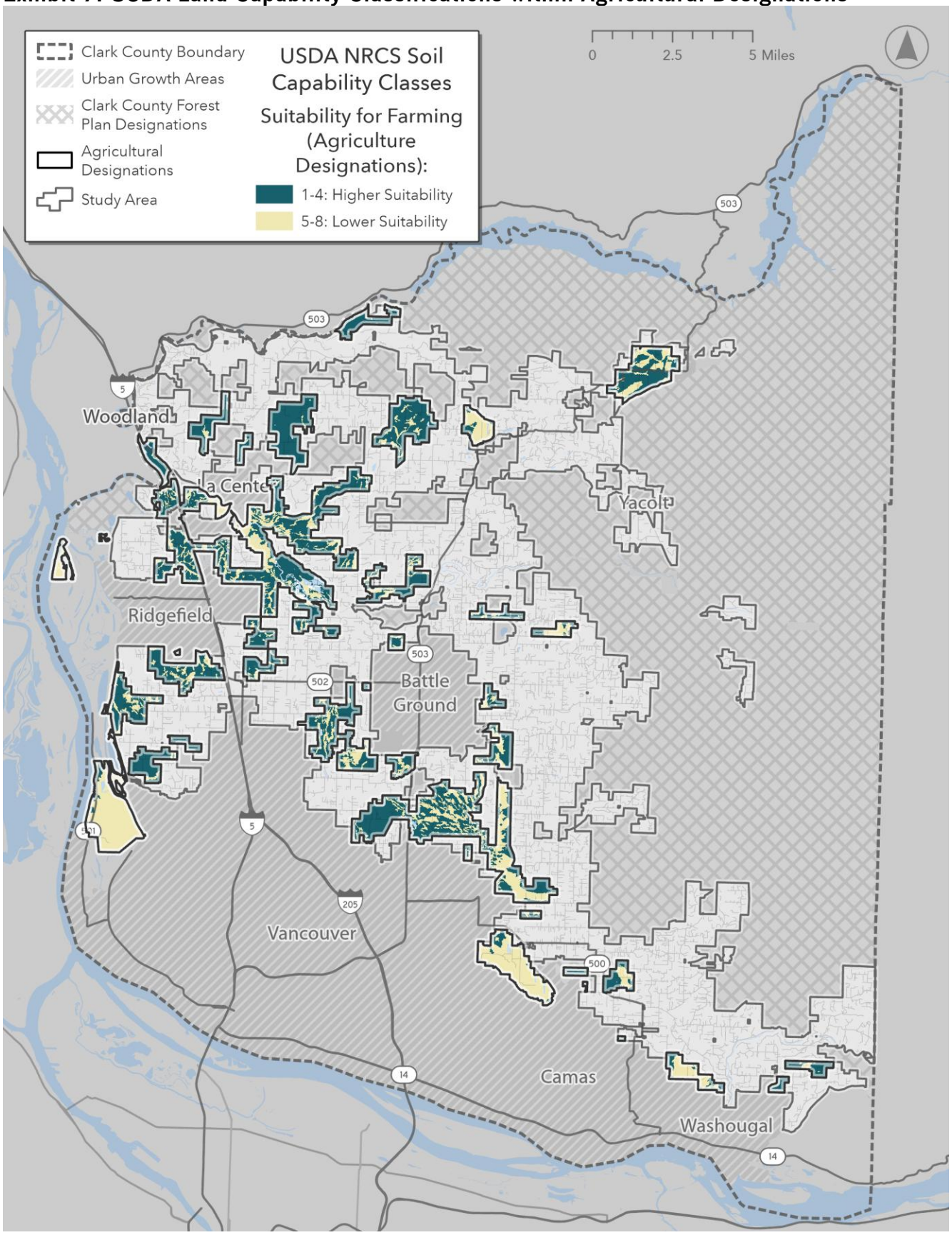
evaluates soils based on their potential for erosion, drainage problems, and other hazards that could impact long-term agricultural use. Its purpose is to guide land management rather than to predict crop yield. The NRCS classifications in the study area are shown in Exhibit 6 and a broader, binary fit-to-farm 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.

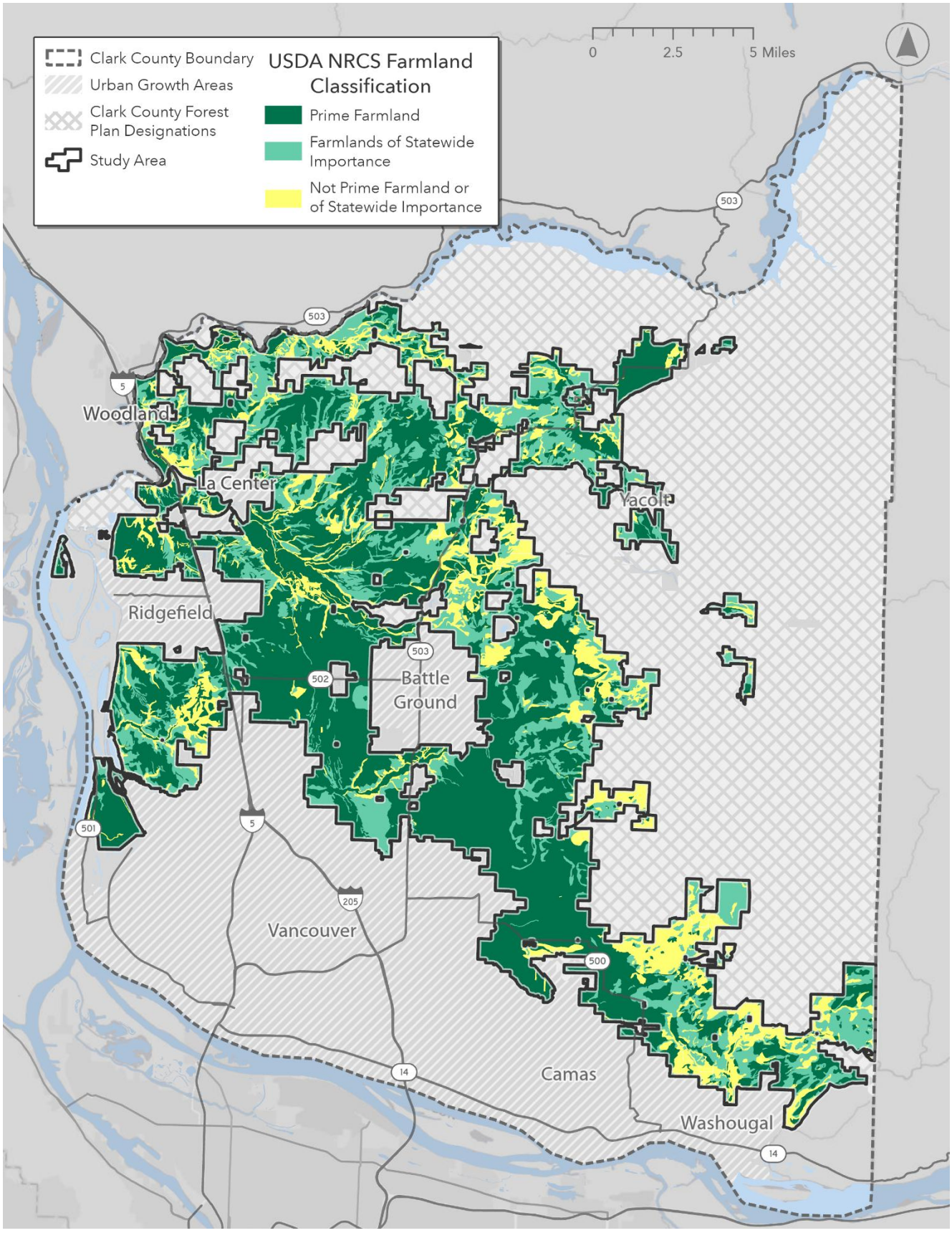
Exhibit 9. Soil Capability Classes Across Agriculturally Designated Lands

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.

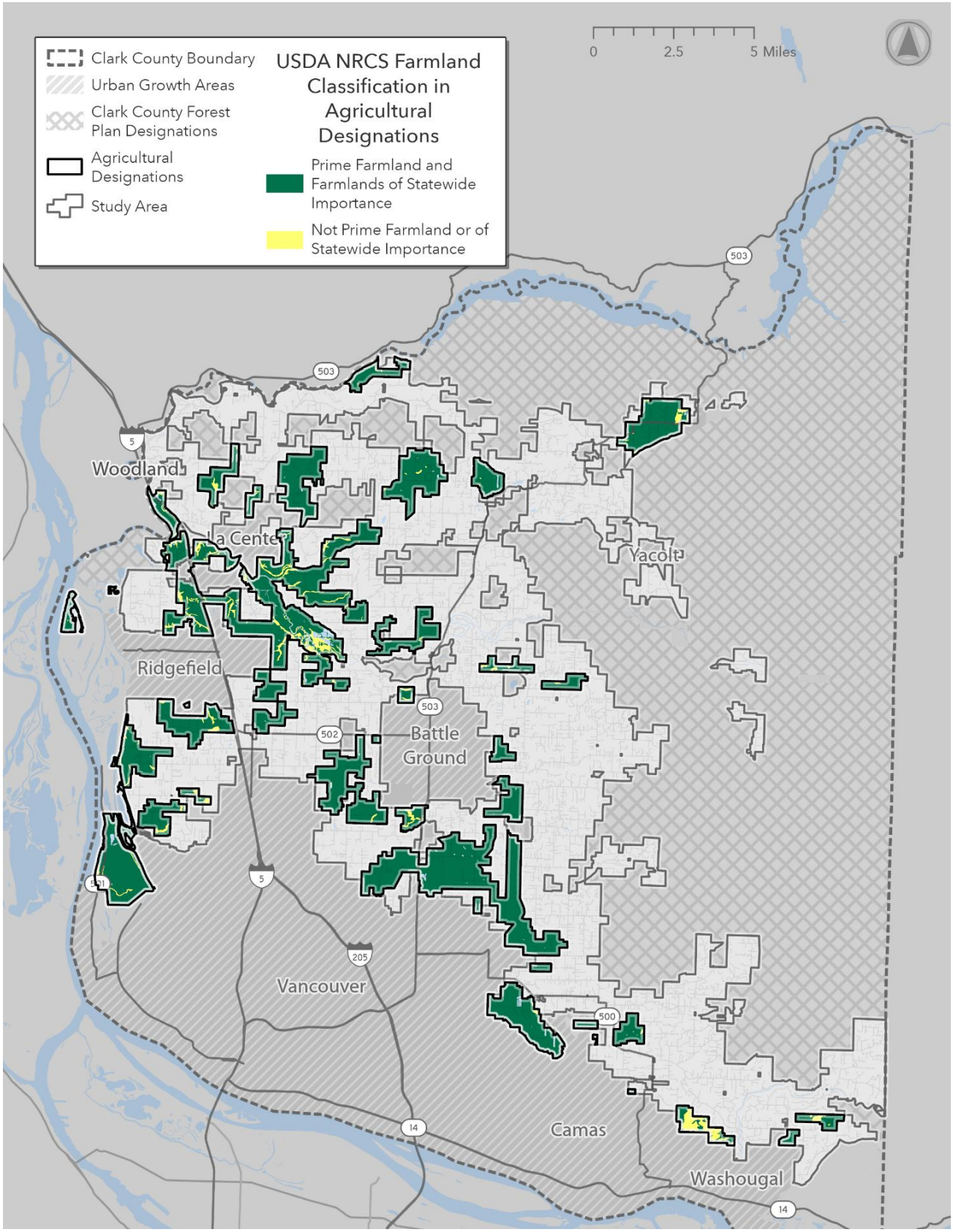
The **Farmland Classification system** provides a different perspective by identifying the most important agricultural soils based on their productive qualities. Instead of focusing on limitations, it classifies soils into categories such as “Prime Farmland,” “Farmland of Statewide Importance,” and "Unique 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

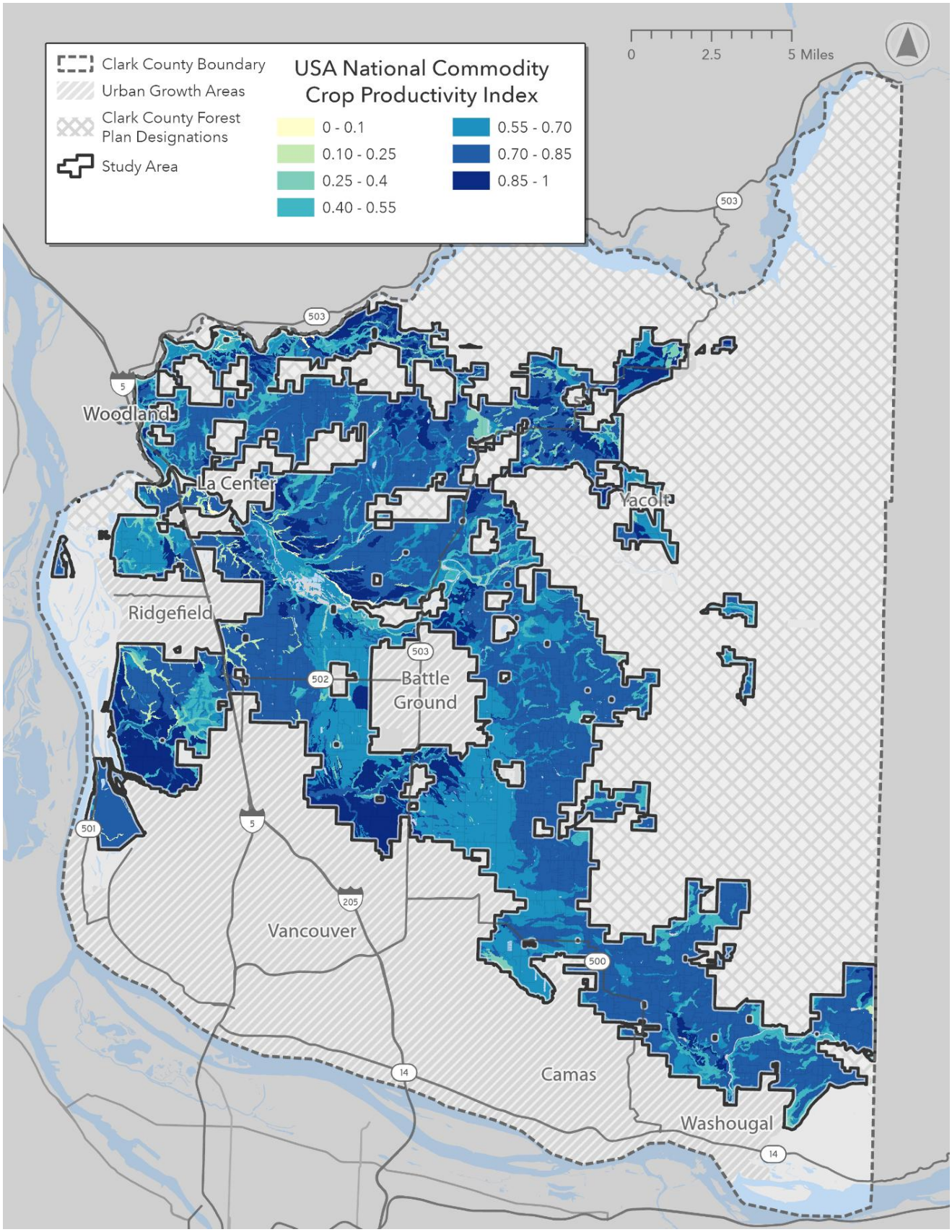
Exhibit 15. Farm Subclasses Across Lands within Agricultural Designations

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)

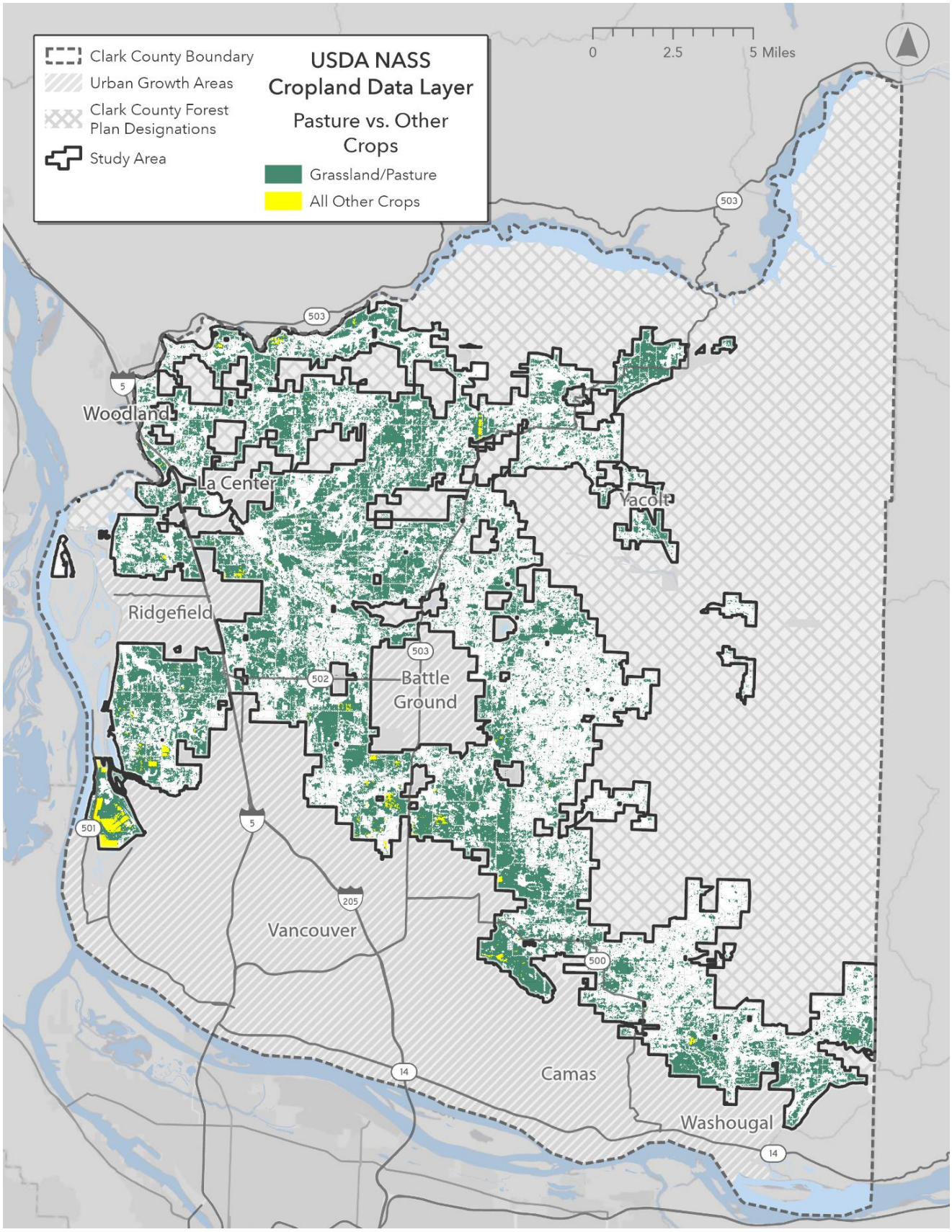
CROP COVERAGE

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

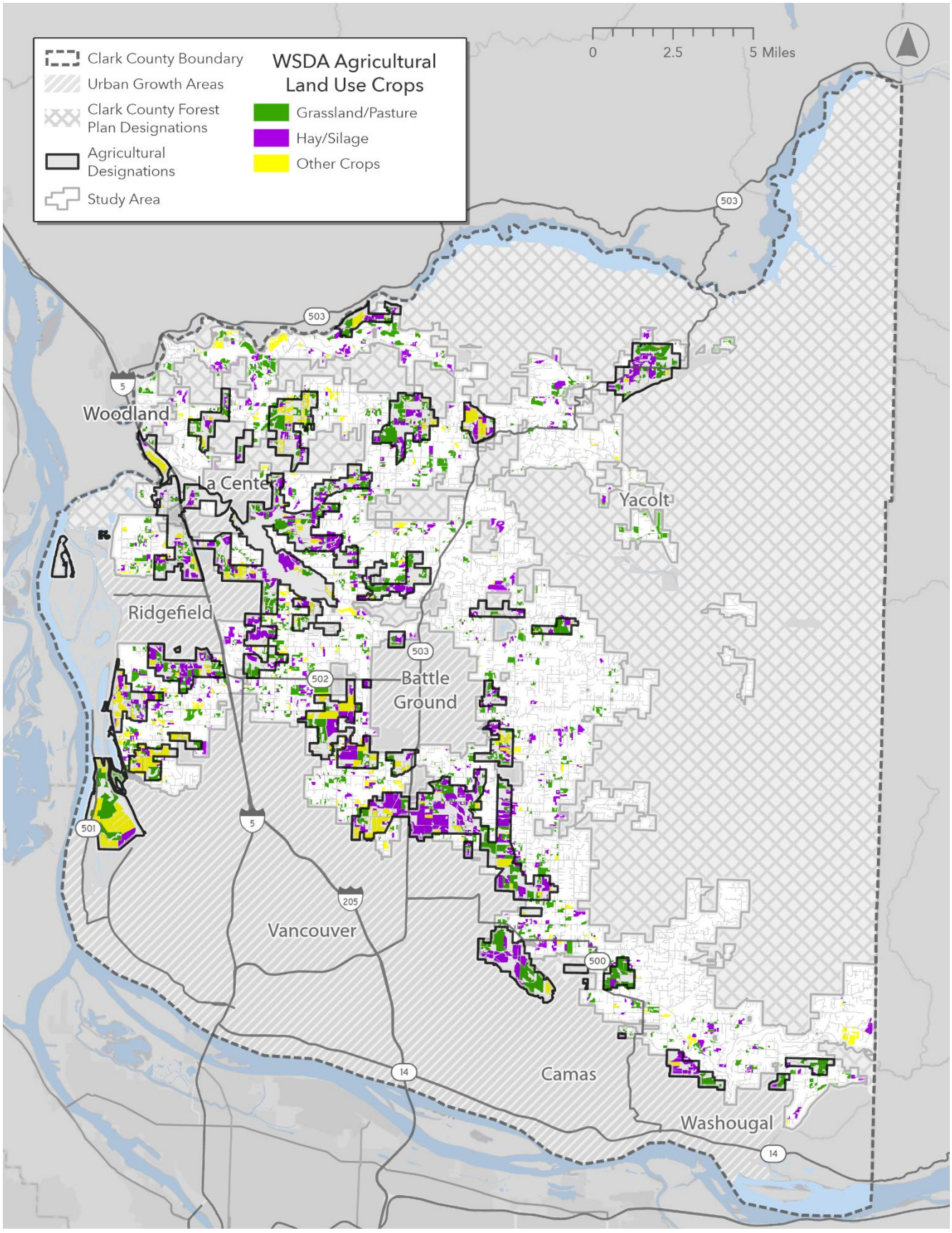
Exhibit 17. USDA NASS Cropland Data Layer



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

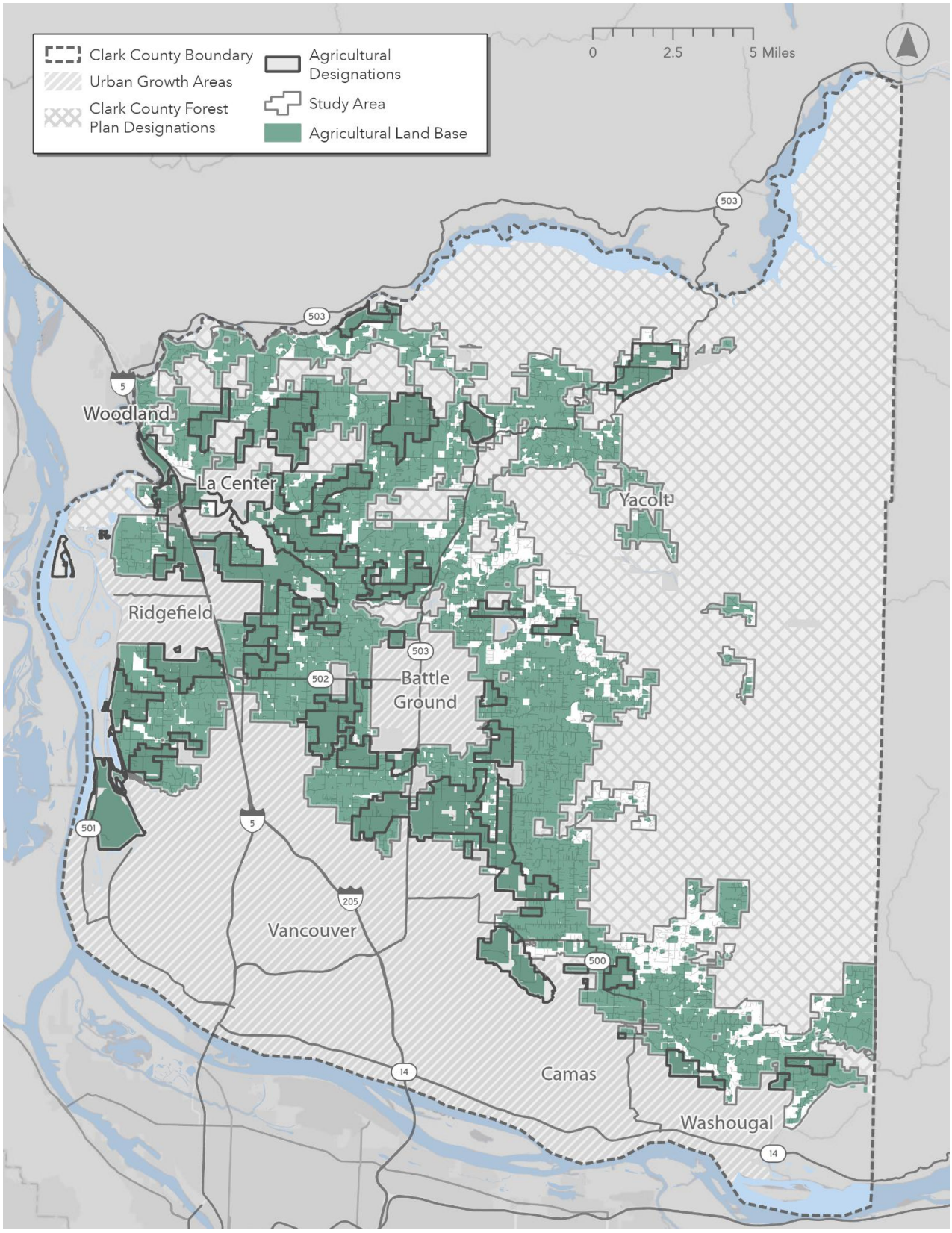
[20] Washington Administrative Code (WAC). § 365-190-040(10)(c). https://app.leg.wa.gov/wac/default.aspx?cite=365-190-040

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

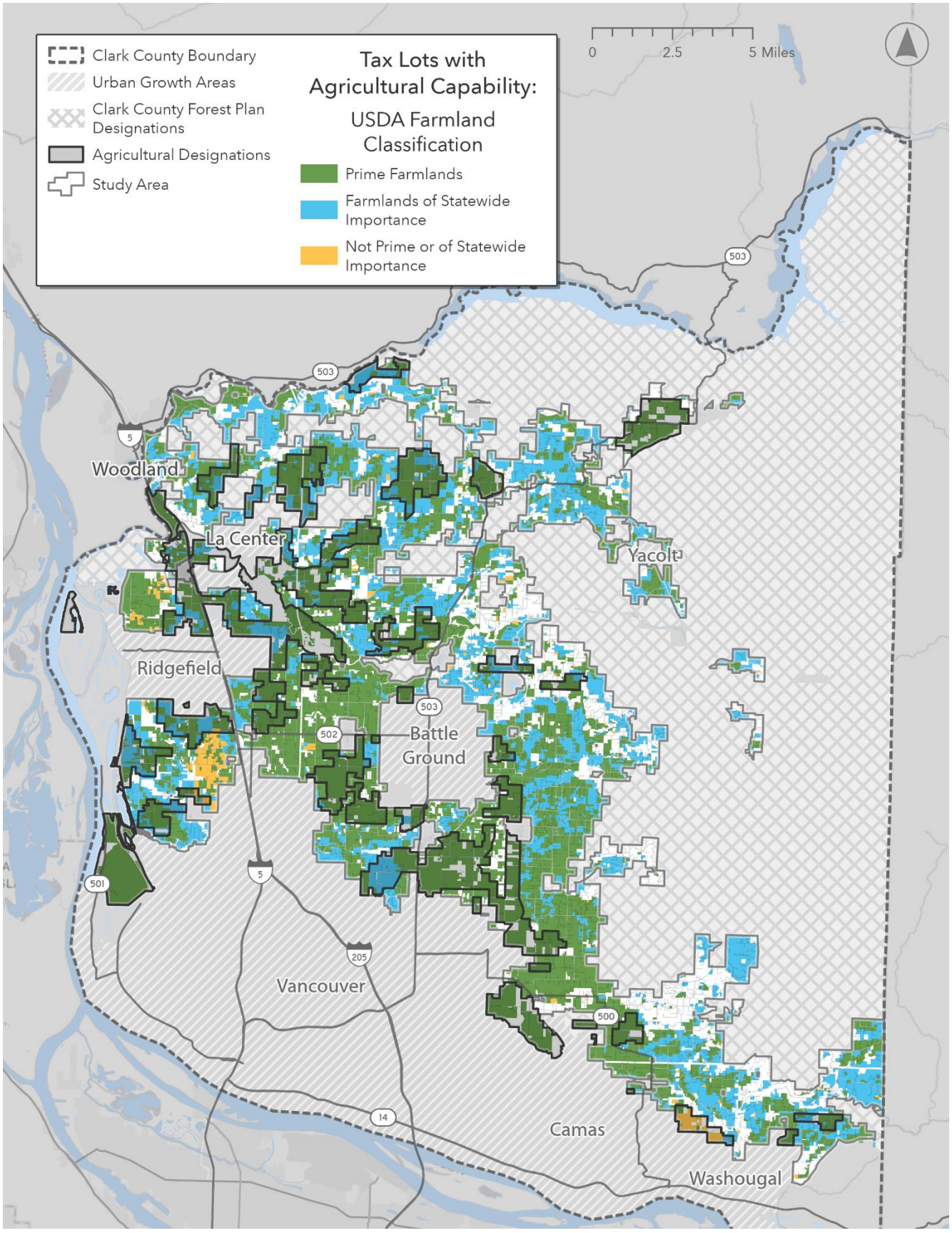
23

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)

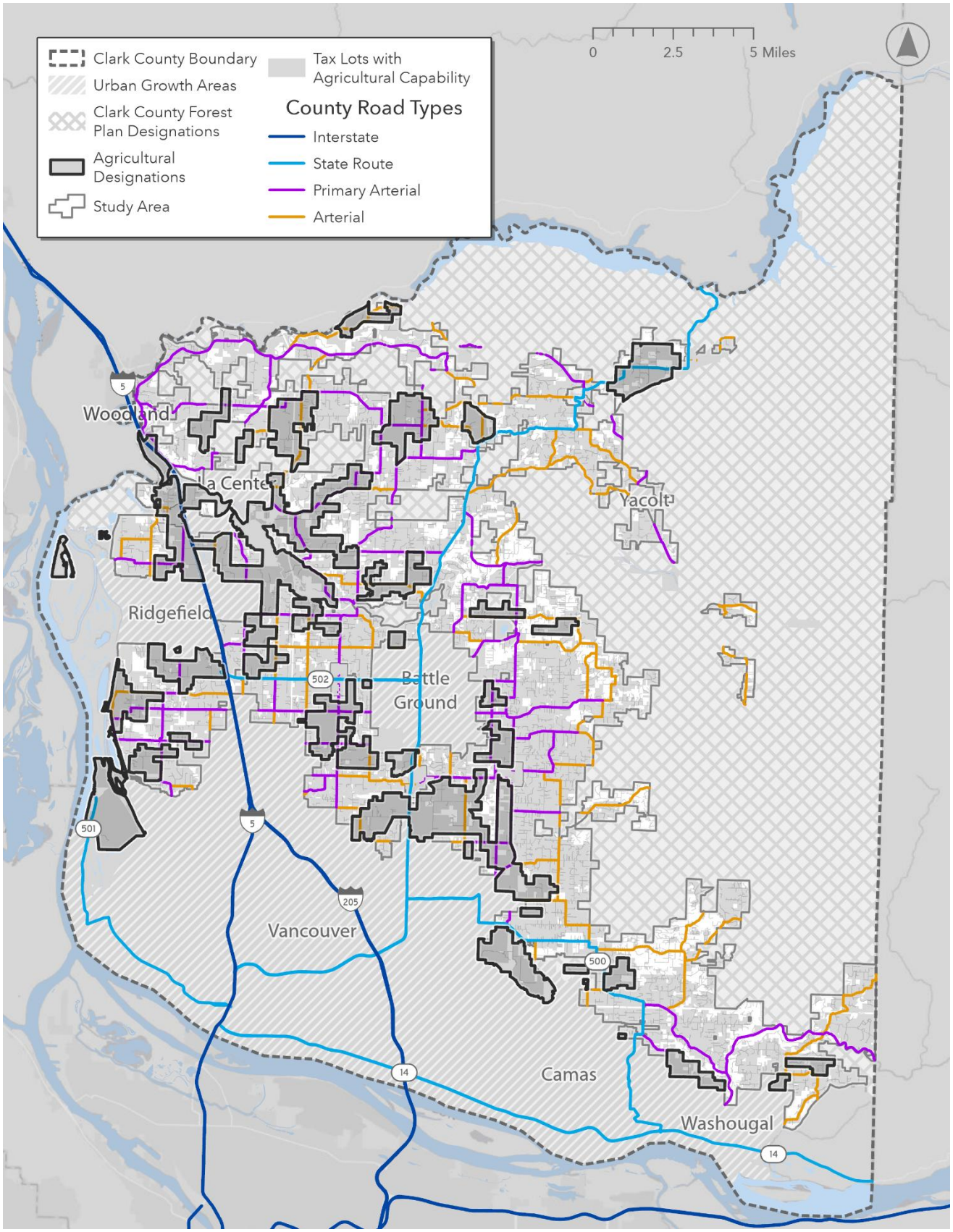
Public Facilities

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.

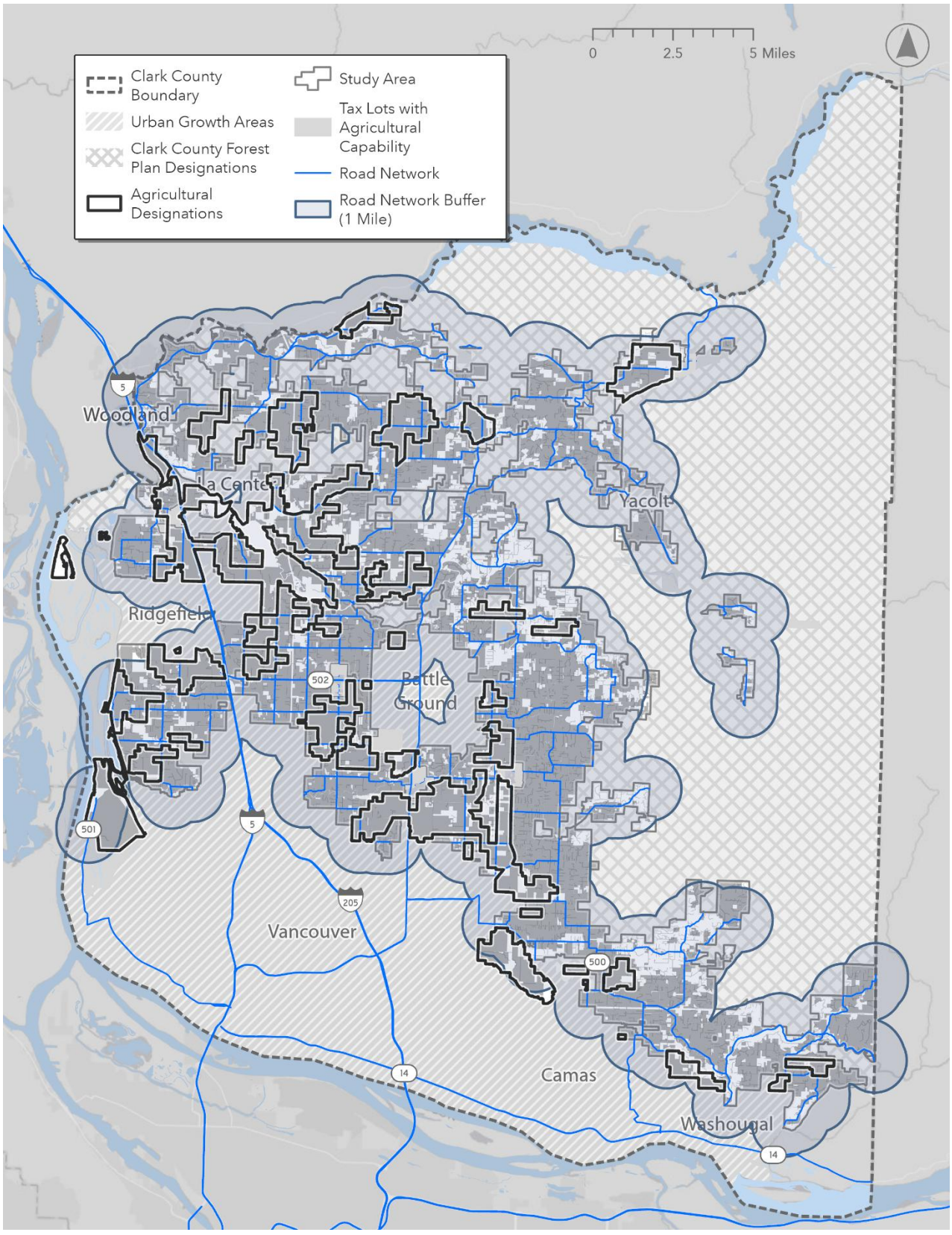
Determination: Both a visual inspection of the buffered road network and a statistical analysis confirm the all-encompassing nature of major road access for lands within the agricultural land base. The analysis shows that nearly every parcel has excellent access to the major road network. Because this 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.

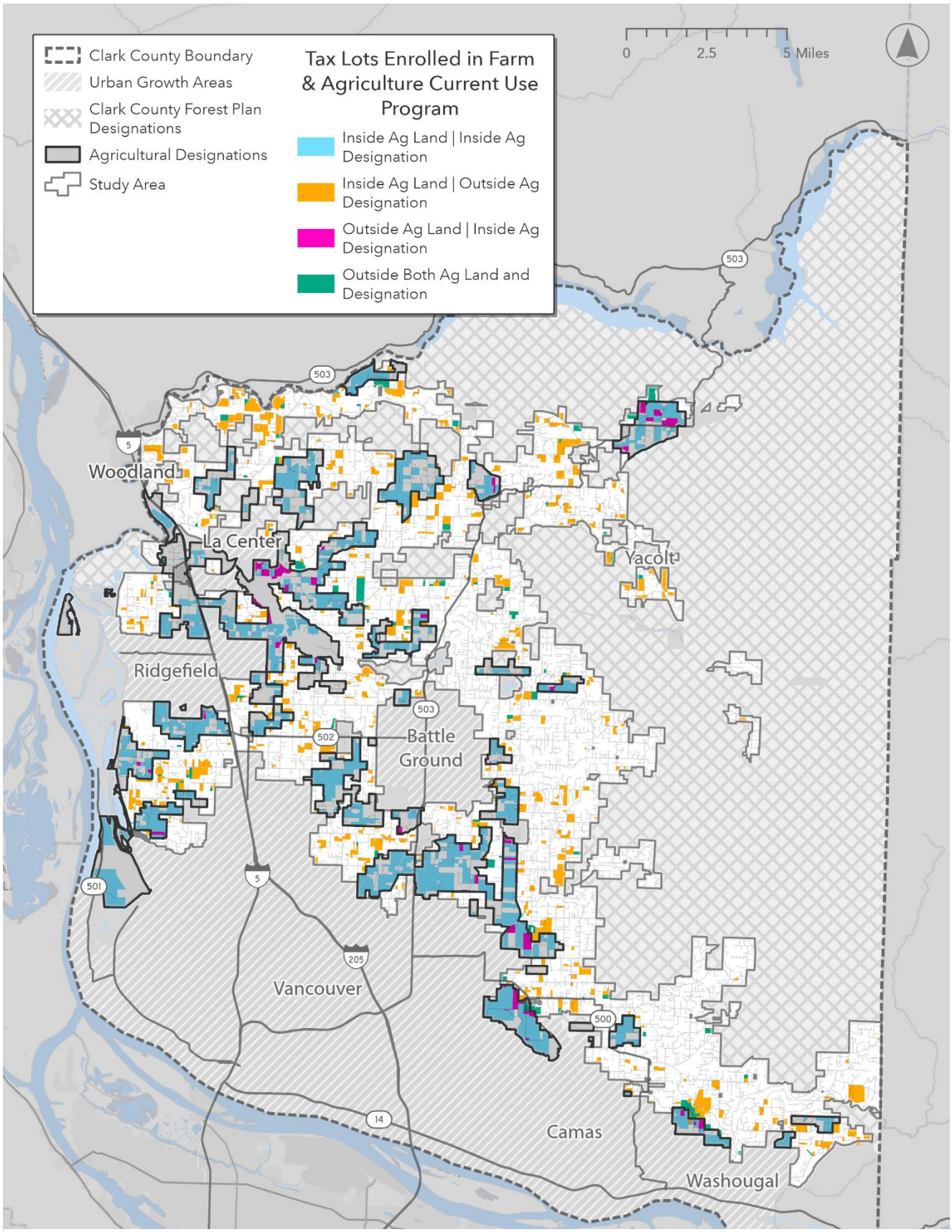
1. **Land Base Only:** 850 parcels (over 9,000 acres, 26%) are in the land base but *outside* a designation.
2. **Designation Only:** About 70 parcels (1,110 acres, 3%) are in a designation but *outside* the land base.
3. **Both:** 760 parcels (16,880 acres, 48%) are in *both* the land base and a designation. 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).

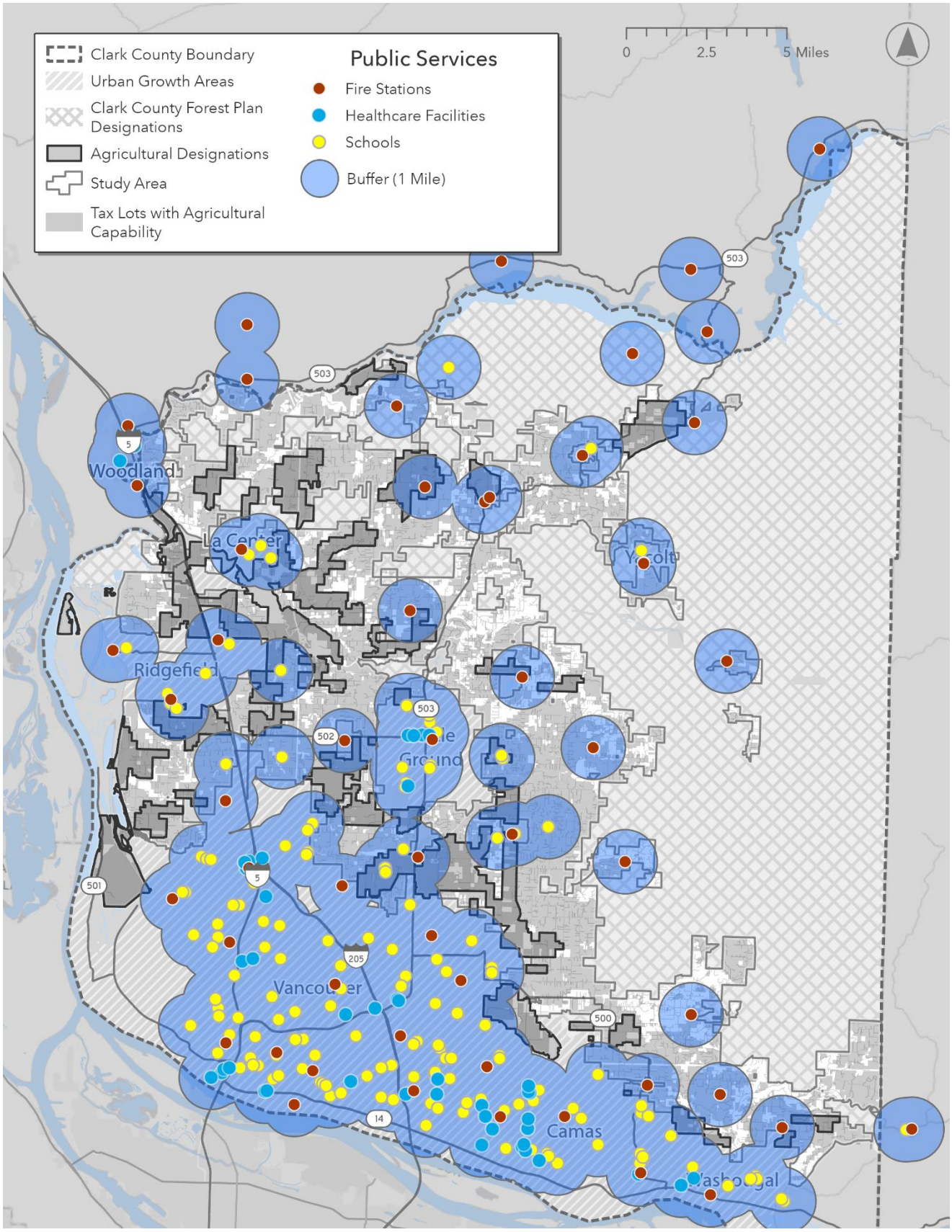
The comprehensive, merged buffer covers a substantial portion of the agricultural landscape, including 37,025 acres, or 36 percent of the agricultural land base, and 11,919 acres (37 percent) of the agricultural designations. Of the total acreage within this service area, the majority, approximately 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)

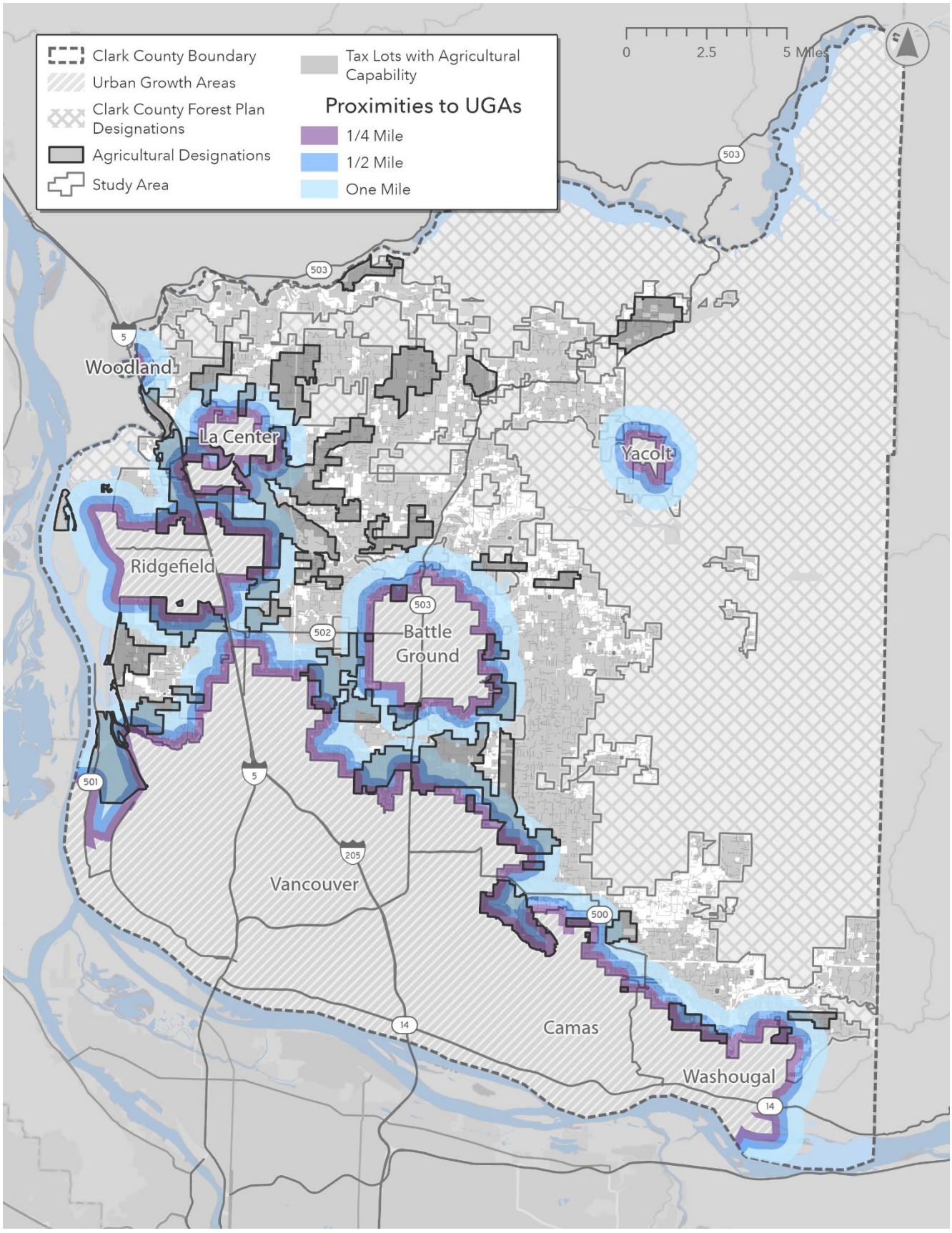
Proximity to Urban Growth Areas

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

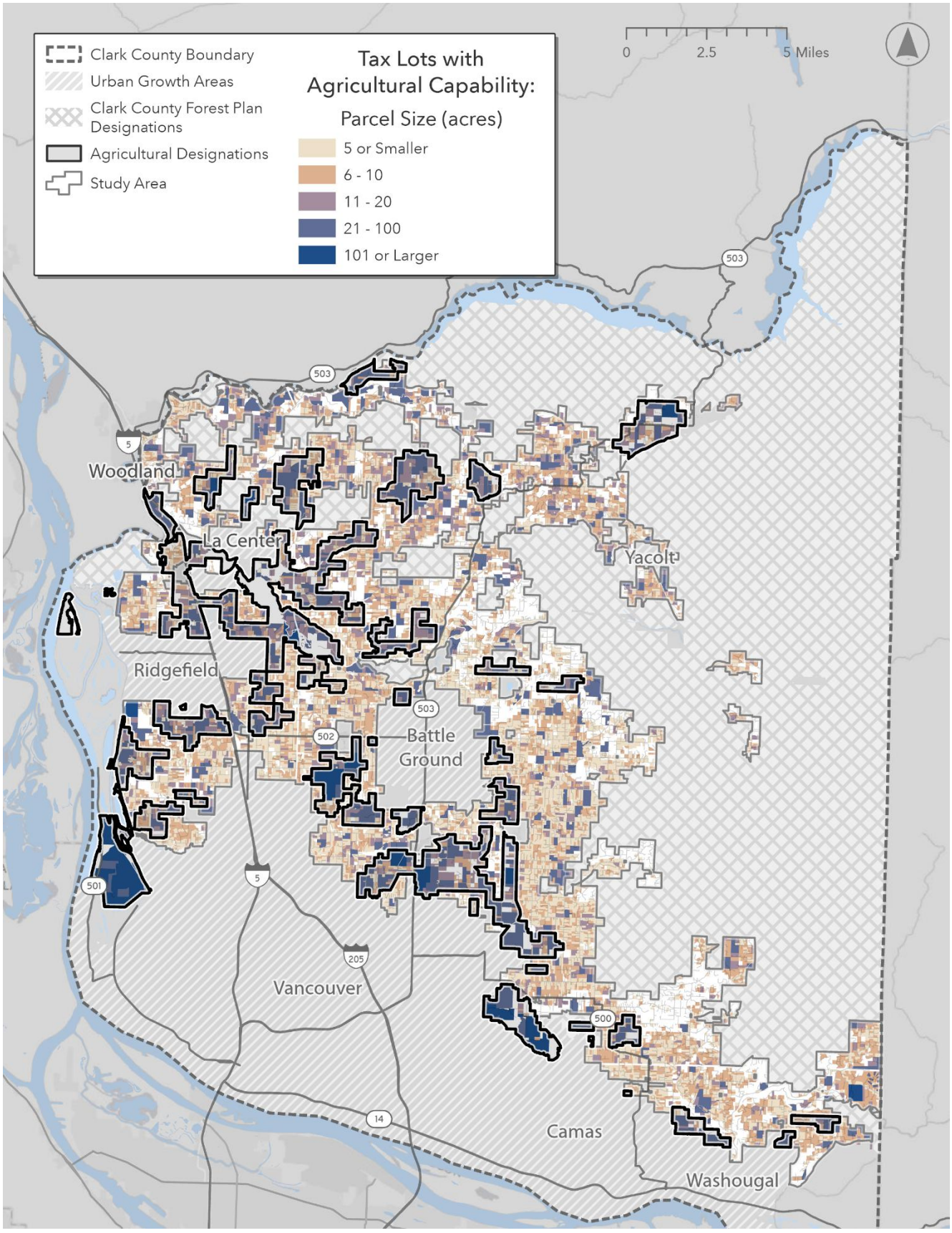
This section evaluates predominant parcel size, a WAC criterion that serves as a direct measure of land fragmentation. The viability of commercial agriculture often depends on the availability of large, contiguous blocks of land. A landscape fragmented into many small parcels is generally less suited 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.

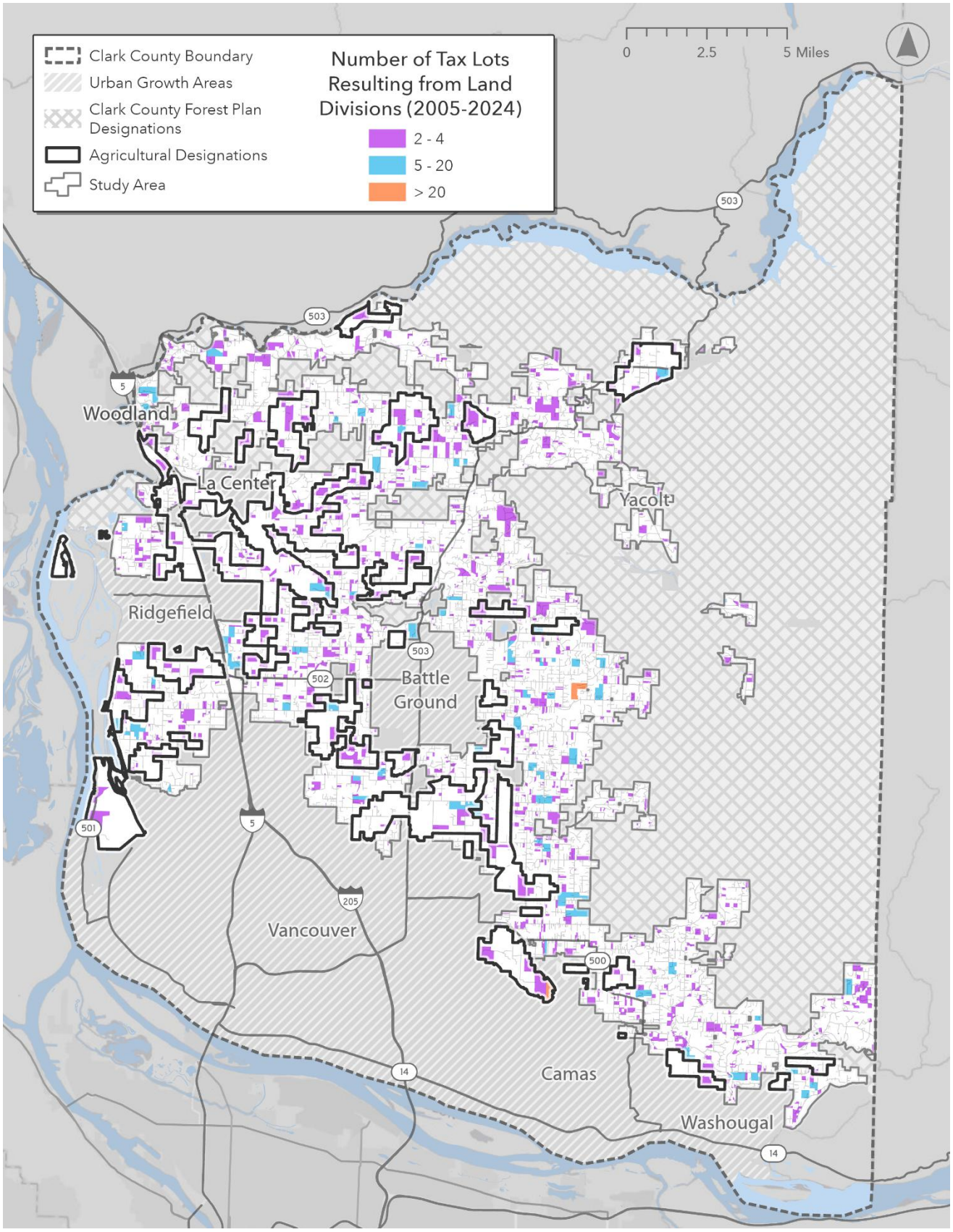
By 2024, these 860 parent parcels transformed into 2,070 resulting parcels. The most frequent outcome was a parcel between 1 and 5 acres; this category comprised 975 resulting parcels (47 percent of all resulting parcels), though these smaller lots only accounted for about 3,000 acres (20 percent of 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:

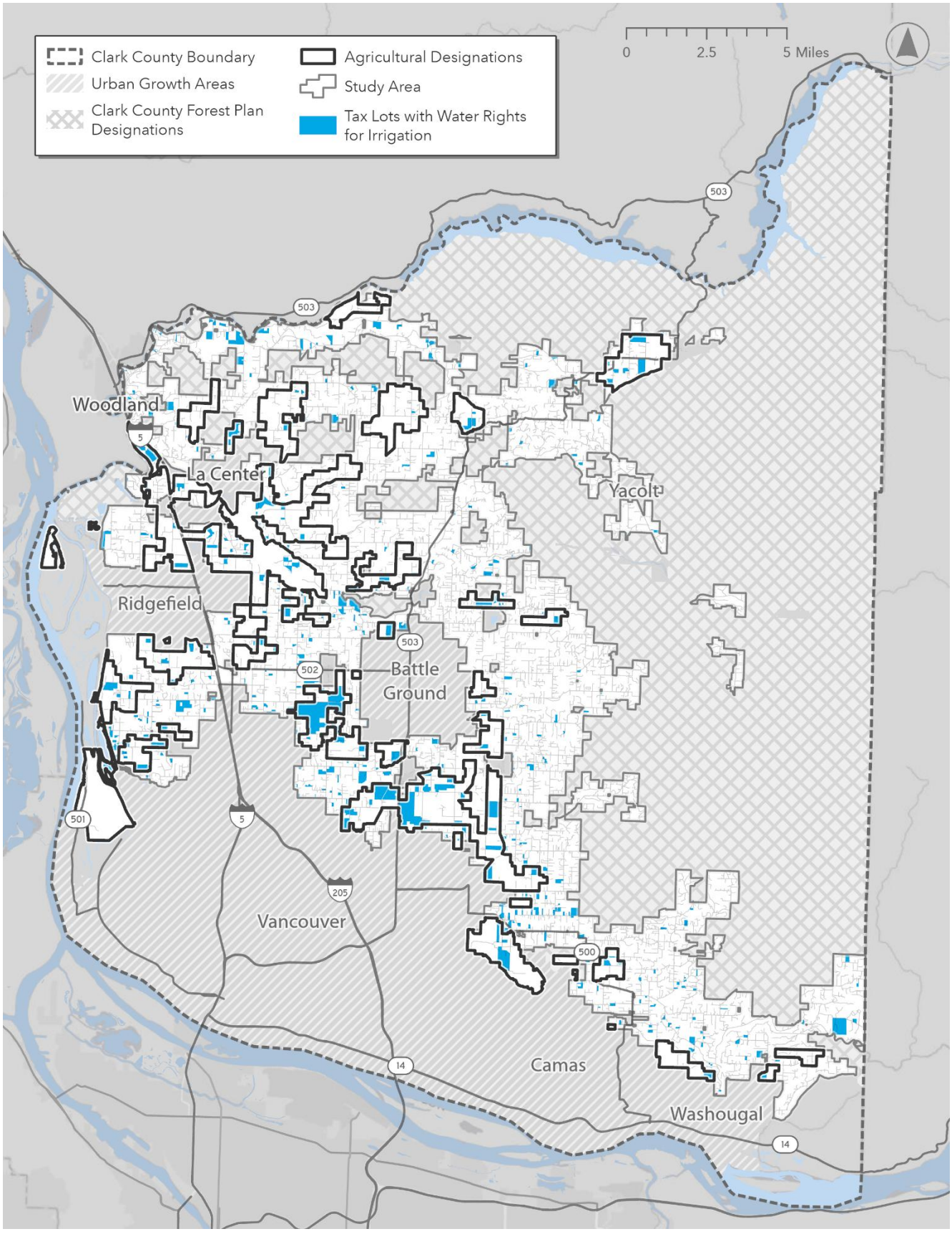
- 117 permits (covering 5,000 irrigated acres) are located within *both* the agricultural land base and an agricultural designation.
- 324 permits (4,100 acres) are in the agricultural land base but *outside* a designation.
- 9 permits (340 acres) are in an agricultural designation but *outside* the 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

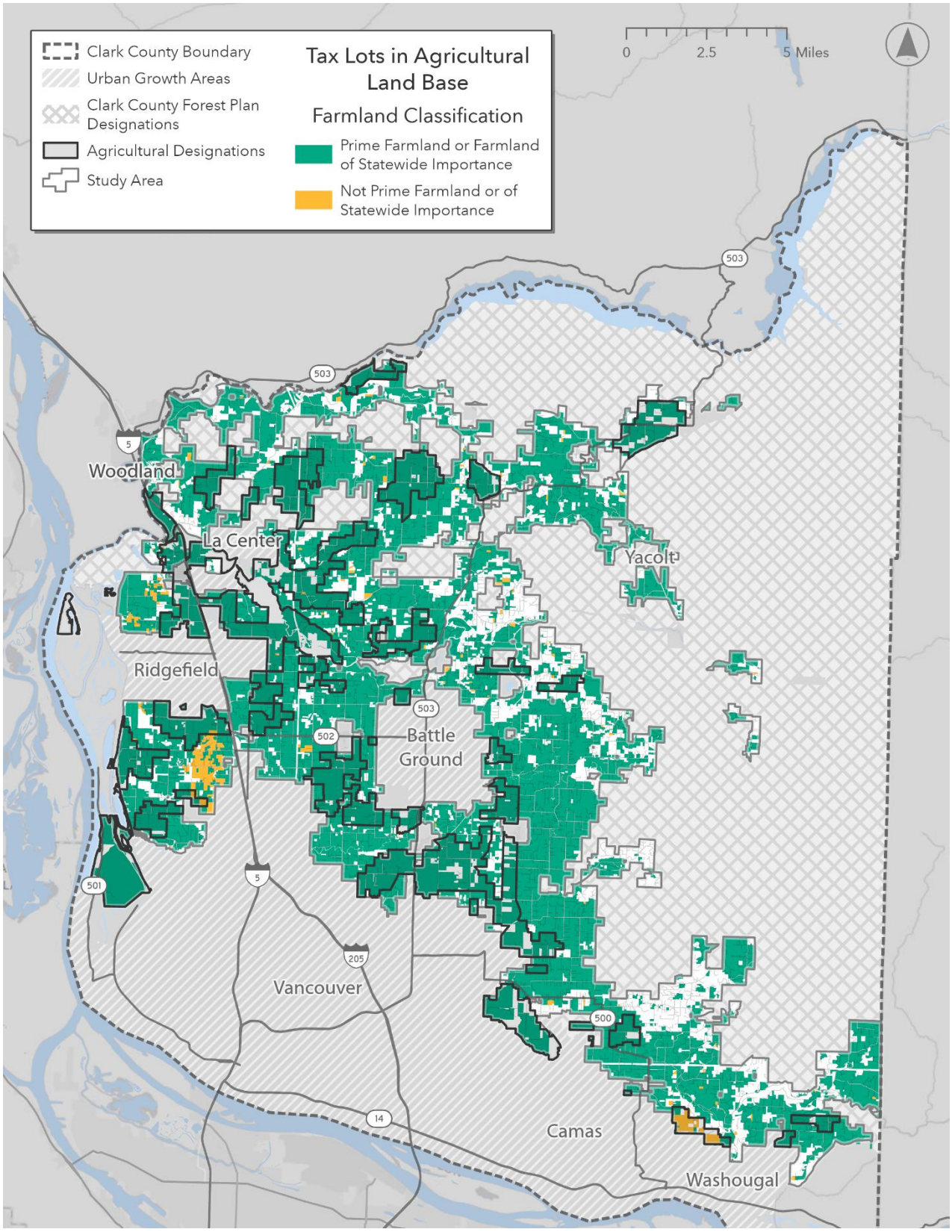
[34] Guirguis, Samira. "Community Supported Agriculture (CSA) in Washington: What is CSA and why is it important?" Washington State Department of Agriculture Blog. https://agr.wa.gov/about-wsda/blog-posts?article=42091.
[35] https://eatlocalfirst.org/wa-food-farm-finder/csa/

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

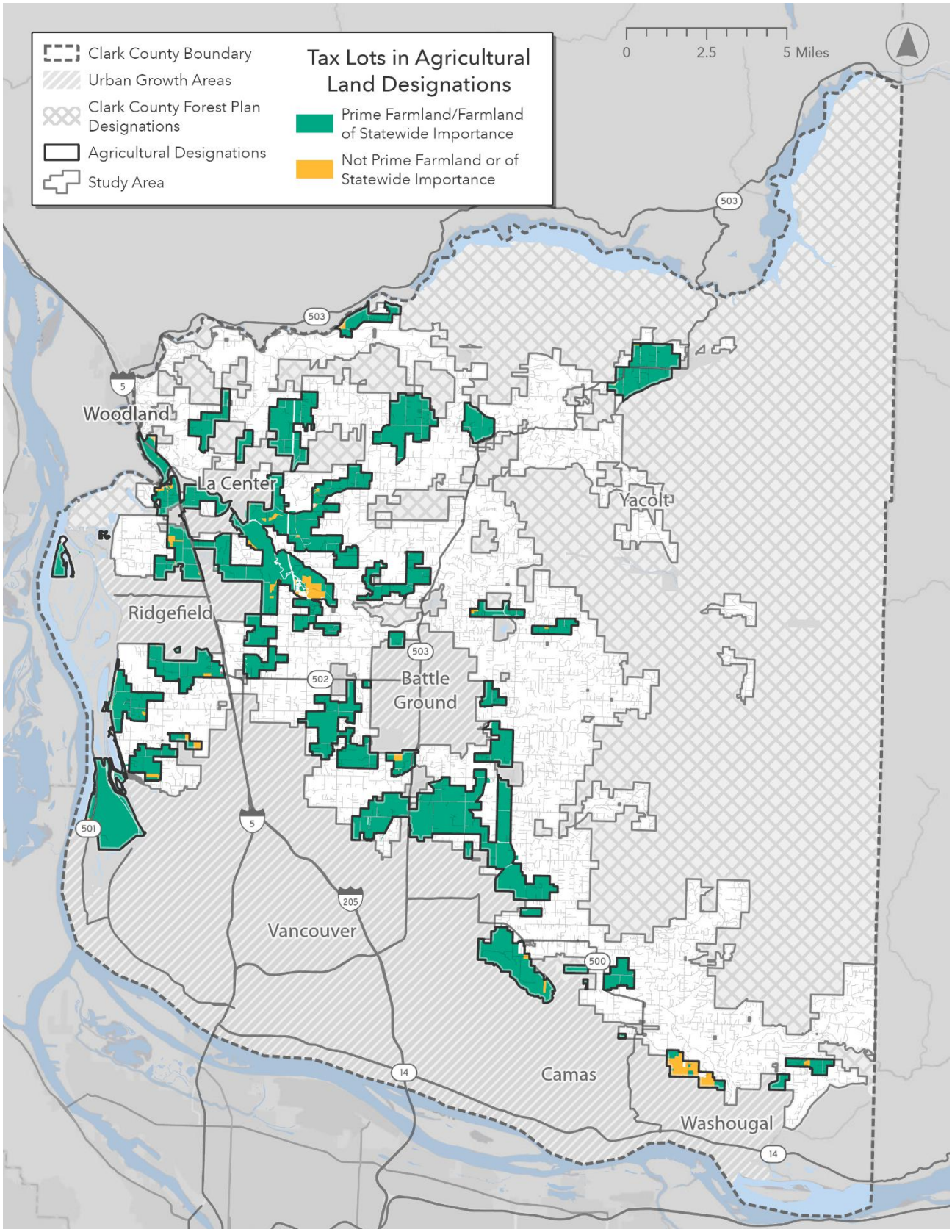
Parcel Size	# of Parcels	% of Parcels in Area	# of Acres	% of Acres in Area
In Agriculture Land Base	**18,109**	**98%**	**99,932**	**98%**
< 5	11,805	64%	31,381	31%
5 - 10	4,561	25%	28,620	28%
10 - 20	1,074	6%	15,564	15%
20 - 100	648	4%	20,632	20%
> 100	21	0.1%	3,735	4%
In Agriculture Designations	**2,519**	**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



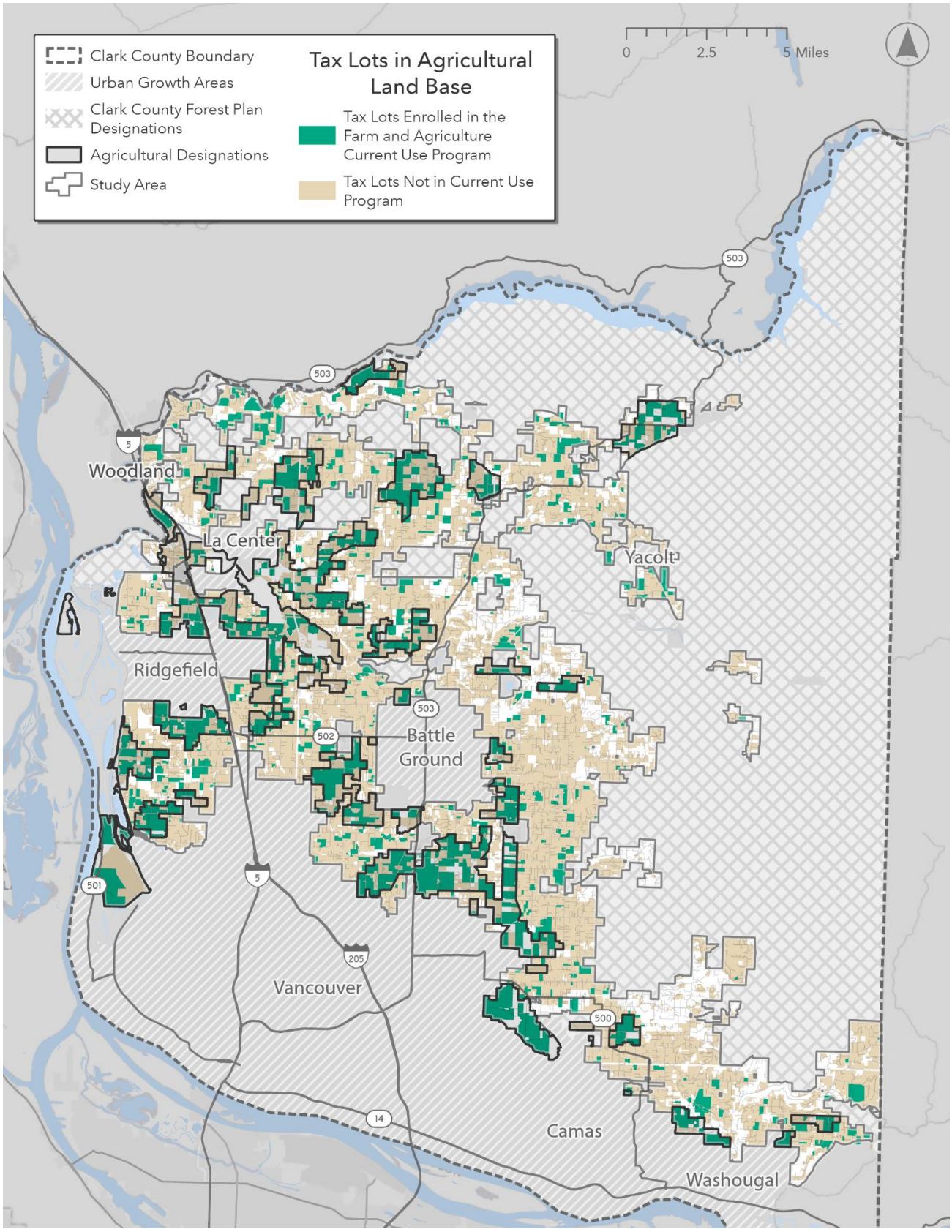
Source: USDA NRCS (2024), Clark County (2025)

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

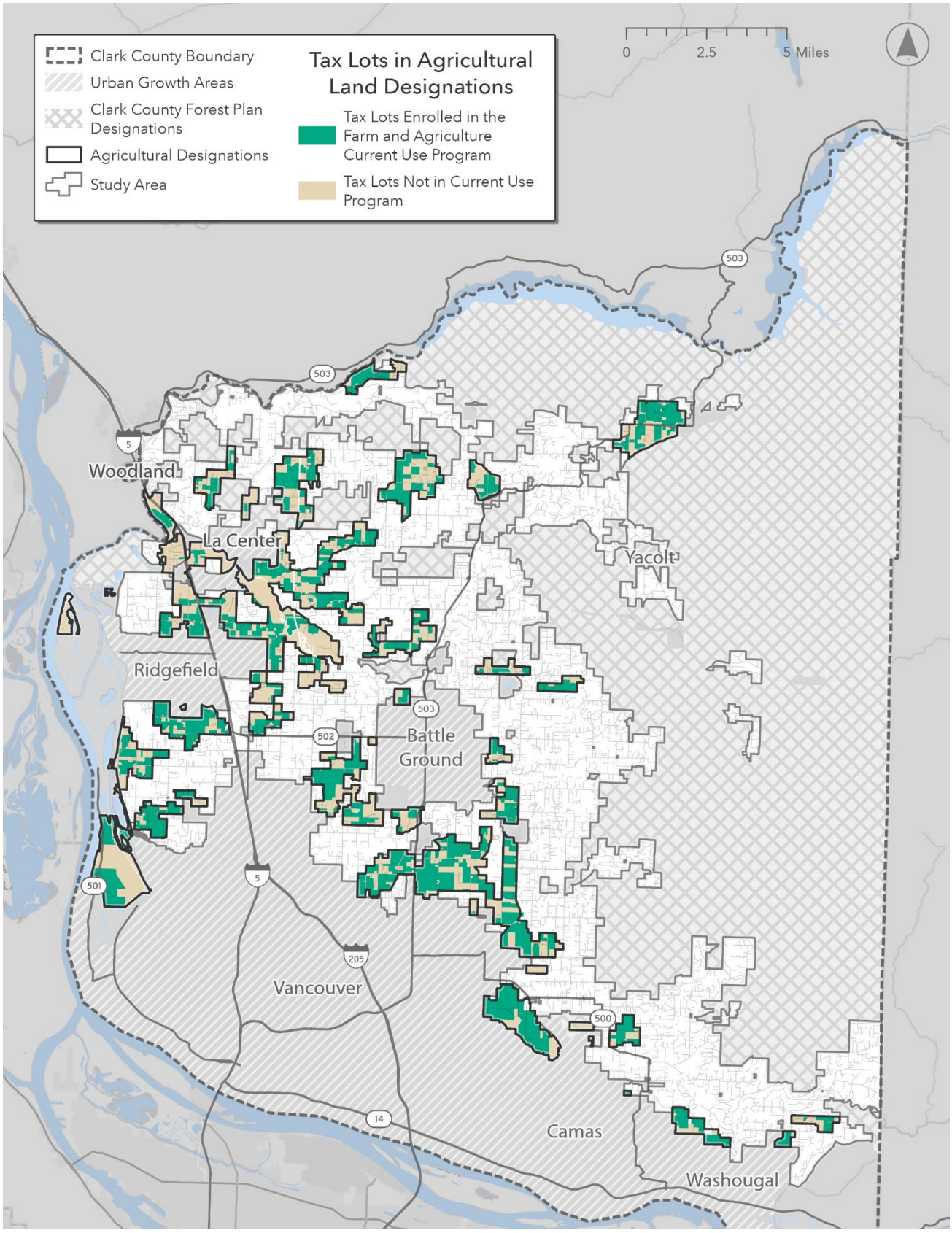
Parcel Size	# of Parcels	% of Total Parcels in Area	# of Acres	% of Total Acres in Area
In Agriculture Land Base	**1,608**	**9%**	**25,962**	**25%**
< 5	365	2%	1,484	1%
5 - 10	461	3%	3,248	3%
10 - 20	385	2%	6,106	6%
20 - 100	382	2%	12,371	12%
> 100	15	0%	2,752	3%
In Agriculture Designations	**829**	**32%**	**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



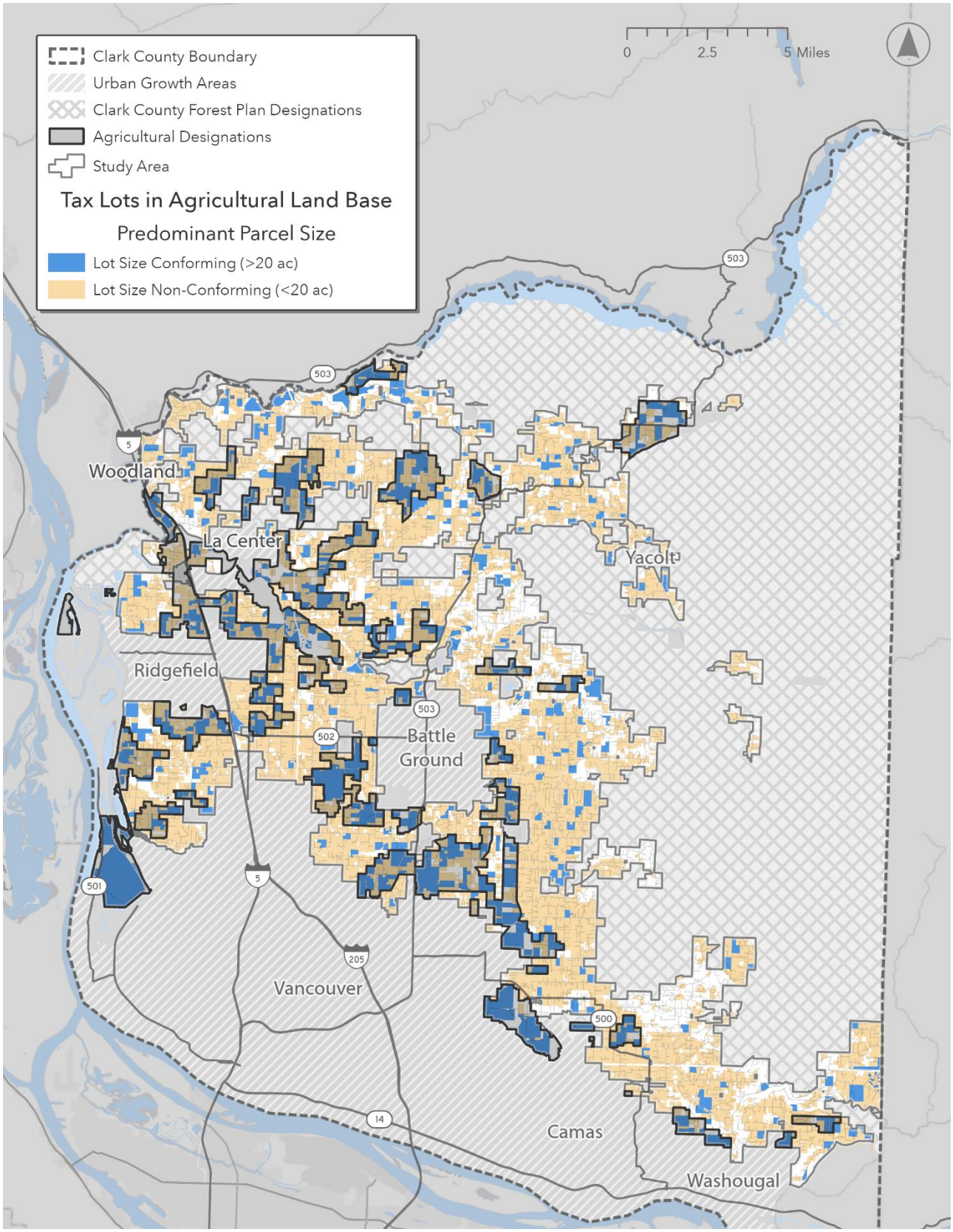
Source: Clark County (2024)

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

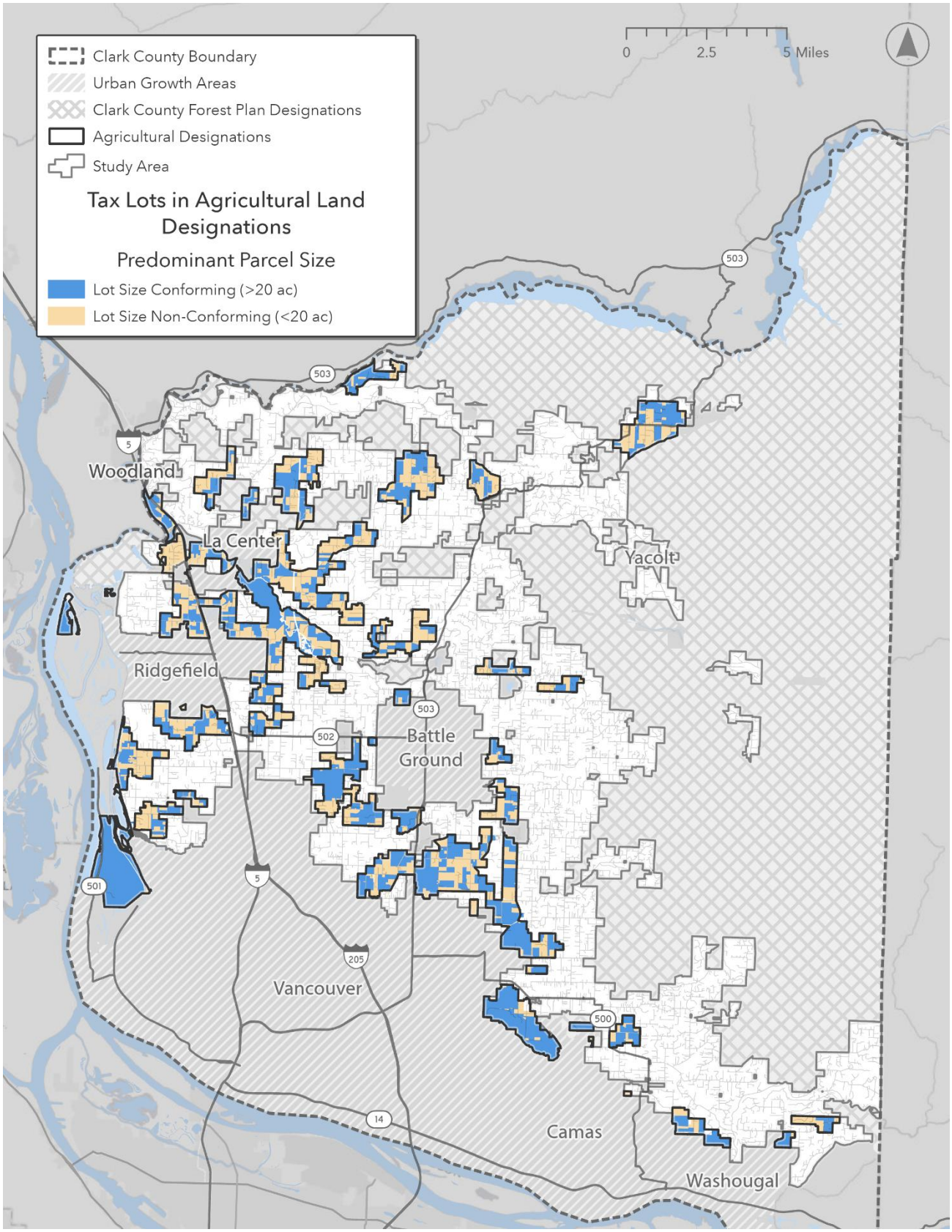
Predominant Parcel Size (acres)	# of Parcels	% of Parcels	# of Acres	% of Acres	Median Parcel Size
In Agriculture Land Base	**18,420**	**100%**	**101,844**	**100%**	**4.6**
Non-Conforming Parcels	**17,733**	**96%**	**76,871**	**75%**	**4.4**
< 5	11,996	65%	31,949	31%	2.5
5 - 10	4,648	25%	29,147	29%	5.4
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.

[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.

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.

Staff Report

November 17, 2025 Council Workshop Meeting

Construction Award Well Casing Decommissioning
Presenter: Rob Charles, Utilities Manager
Time Estimate: 5 minutes

Phone	Email
360.817.7003	rcharles@cityofcamas.us

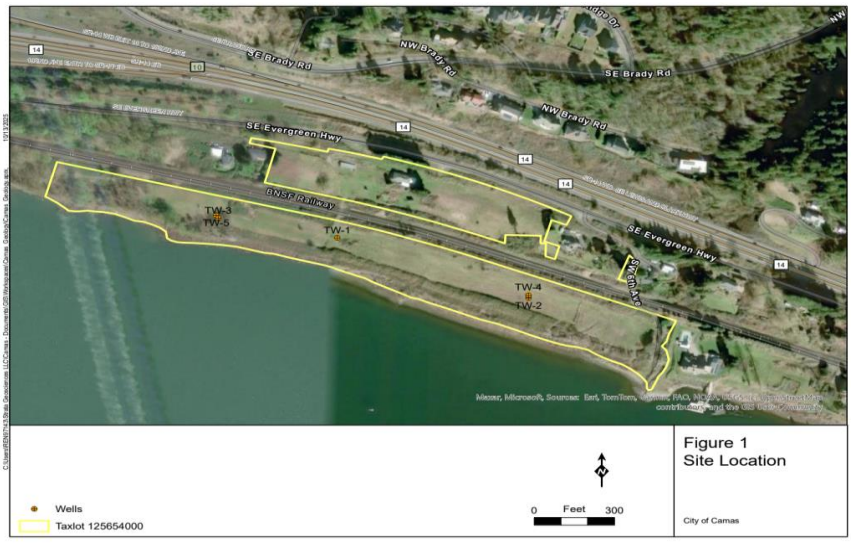
BACKGROUND: In 2001, the City drill five (5) test wells at 5440 SW 6th Avenue to evaluate the site as an additional water supply source. Unfortunately, the test wells did not provide the amount of water which was anticipated and were not developed into production wells.

The property owner has requested that the City remove the exposed piping and decommission the abandoned wells from their property. Proper well decommissioning is required by the Washington State Department of Ecology under Chapter 173-160 WAC. Abandoning a well casing must be done by injecting cement into the casing and removing the top section of the casing to below grade of the existing ground.

SUMMARY: The City advertised the project for bids on October 20, 2025, with bids due on November 4, 2025. A pre-bid job walk was held on October 27, 2025 to provide interested contractors an opportunity to review the site conditions.

Bids were solicited from five (5) qualified well-drilling contractors, and the City received one (1) bid from Holt Services, Inc. in the amount of $79,821. The engineer's estimate for the project was $65,000.

Figure 1: Test Well Locations 1-5 at 5440 SW 6th Avenue



igure 2: Test Well 1 at 5440 SW 6th Avenue

BENEFITS TO THE COMMUNITY: Decommissioning these unused wells will ensure compliance with state regulations, prevent potential contamination of groundwater resources, and restore the affected private property

STRATEGIC PLAN: This project aligns with the strategic plan's "Stewardship of City Assets" priority by ensuring the long-term integrity of the City's water infrastructure, protecting groundwater resources, and demonstrating proactive management of critical utility assets.

BUDGET IMPACT: The total project cost of $79,821 can be funded through the Water/Sewer Fund. Staff anticipates sufficient budget capacity to cover the expense, and the cost could be allocated from the Water Renewal & Replacement (R&R) program. Funding for this project can also be incorporated into the Spring 2026 Omnibus Budget Amendment if needed.

RECOMMENDATION: Staff would recommend this item be placed on the December 1st Council Regular Consent Agenda for their consideration.

Staff Report

November 17, 2025 Council Workshop Meeting

Construction Award Main Pump Station Improvements
Presenter: Rob Charles, Utilities Manager
Time Estimate: 5 minutes

Phone	Email
360.817.7003	rcharles@cityofcamas.us

BACKGROUND: Main Street Sewer Pump Station is the largest pump station in the city and collects sewage from over 80% of the city. The facility is over 20 years old and requires upgrades to maintain reliable operation and ensure staff safety.

Wallis Engineering, part of the City's on-call sewer services roster, was contracted to design the project and develop the construction documents for bidding; their contract was approved by Council on August 5, 2024, for $125,892.73.

The planned construction project includes:

- Replacement of electrical equipment, control panels, and variable frequency drives for the pumps.
- Installation of a flow meter to measure lift station outflows.
- Replacement of the generator's Automatic Transfer Switch (ATS).
- Upgrades to HVAC systems for improved safety.
- Safety improvements to hatch access and other station components.

SUMMARY: The City advertised the project for bids on September 18, 2025, and bids were opened on October 14, 2025. Three bids were received, with Tapani, Inc. submitting the lowest responsible bid of $898,122, below the engineer's estimate of $975,000.

Figure 1: Control Panel

Fig 2: Variable Frequency Drive Panel

Fig 3: Electrical Panel

Fig 4: Substandard Hatch for Pump Access

Fig.5: Front of Pump Station

Fig 6: Site Location

BENEFITS TO THE COMMUNITY: This project ensures reliable sewer service for over 80% of the City, improves staff safety, and maintains critical infrastructure to protect public health and the environment.

STRATEGIC PLAN: This project aligns with the strategic plan's priority "Stewardship of City Assets" by maintaining critical utility infrastructure, ensuring reliable sewer service for the community, and improving operational safety for staff.

BUDGET IMPACT: The estimated cost of the project is $1,057,711 and will be funded from the sewer pump station R&R fund.

Budget:	
Sewer Pump Station R&R (Water/Sewer Fund)	***$2,000,000***
Estimated Construction Expenses:	
Construction	$ 898,122
Construction Contingency (10%)	$ 89,812
*Telemetry Updates	$ 69,777
*****Total Estimated Construction Cost***	***$1,057,711***

** Telemetry (remote monitoring system) work will be completed under a separate contract with the City's existing vendor to ensure compatibility with current systems. Costs noted is an estimate and will be brought forward for Council approval once finalized.*

*** Design support during construction is not included in this total; sufficient budget remains in the original Wallis Engineering design contract to cover these services.*

RECOMMENDATION: Staff would recommend that this item be placed on the December 1st, 2025,Council Regular Consent Agenda for their consideration.

I, Rob Charles, Utilities Manager, hereby certify that these bid tabulations are correct.

Rob Charles, PE Date

PROJECT NO. SWR24003B DESCRIPTION: Main Pump Station Improvements DATE OF BID OPENING: 10/14/25 10:00 A.M.			Engineer's Estimate: $974,902.20 Base Ent. By am	name address email phone	Tapani, Inc PO Box 1900 Battle Ground, WA 98604 bidadmin@tapani.com 360-687-1148	name address email phone	Rotschy, Inc 7408 NE 113th Circle Vancouver, WA 98662 estimator@rotschyinc.com 360-334-3100	name address email phone	McClure and Sons, Inc. 15714 Country Club Drive Mill Creek, WA 98012 bids@mcclureandsons.com 425-316-6999
Project									
ITEM NO	**DESCRIPTION**	**UNIT**	**QTY**	**UNIT PRICE**	**ENGRG TOTAL**	**UNIT PRICE**	**CONTRACT TOTAL**	**UNIT PRICE**	**CONTRACT TOTAL**	**UNIT PRICE**	**CONTRACT TOTAL**
1	Mobilization	LS	1	$81,000.00	$81,000.00	$75,000.00	$75,000.00	$120,155.00	$120,155.00	$100,000.00	$100,000.00
2	Erosion Control and Water Pollution Control	LS	1	$3,500.00	$3,500.00	$2,500.00	$2,500.00	$15,000.00	$15,000.00	$10,000.00	$10,000.00
3	Trench Safety	LS	1	$2,500.00	$2,500.00	$2,500.00	$2,500.00	$1,000.00	$1,000.00	$40,000.00	$40,000.00
4	Temporary Bypass Pumping System	LS	1	$40,000.00	$40,000.00	$75,000.00	$75,000.00	$197,000.00	$197,000.00	$464,504.00	$464,504.00
5	Hatches and Safety Grates	LS	1	$35,000.00	$35,000.00	$20,000.00	$20,000.00	$42,312.00	$42,312.00	$26,000.00	$26,000.00
6	Wetwell Epoxy Coating	LS	1,000	$55.00	$55,000.00	$40.00	$40,000.00	$54.00	$54,000.00	$90.00	$90,000.00
7	HVAC Improvements, Complete	LS	1	$40,000.00	$40,000.00	$25,000.00	$25,000.00	$29,025.00	$29,025.00	$32,000.00	$32,000.00
8	Piping Modifications, Complete	LS	1	$287,300.00	$287,300.00	$215,000.00	$215,000.00	$291,000.00	$291,000.00	$400,000.00	$400,000.00
9	Electrical and Controls Improvements, Complete	LS	1	$351,400.00	$351,400.00	$370,000.00	$370,000.00	$368,000.00	$368,000.00	$350,000.00	$350,000.00
10	Construction Documentation (min 2,000)	LS	1	$2,000.00	$2,000.00	$2,000.00	$2,000.00	$2,300.00	$2,300.00	$2,000.00	$2,000.00
	Subtotal				$897,700.00		$827,000.00		$1,119,792.00		$1,514,504.00
	Sales Tax (8.6%)				$77,202.20		$71,122.00		$96,302.11		$130,247.34
	Total				**$974,902.20**		**$898,122.00**		**$1,216,094.11**		**$1,644,751.34**
	TOTAL CONSTRUCTION COST SCHEDULE (BASIS OF AWARD)**				**$974,902.20**		**$898,122.00**		**$1,216,094.11**		**$1,644,751.34**

Staff Report – Resolution

November 17, 2025 City Council Workshop Meeting

Resolution No. 25-015 Station 41 General and Construction Manager Contract
Presenter: Cliff Free, Fire Chief and Shaun Ford, Division Chief of EMS
Time Estimate: 15 minutes

Phone	Email
360.817.7042	sford@cityofcamas.us

Background: In August 2024 the citizens of Camas approved a 26.3-million-dollar bond to replace the downtown Camas Fire Station with a new combination fire station and administrative facility. Property currently held by the city at 528 NE 4th Avenue has been identified as the location of this project. The schematic design for this project was completed in September 2025 and continues moving forward in permitting and design development.

Early on it became evident that this project would include some complexities that would lend itself well to utilizing an alternative public works contracting model known as a General Contract/Construction Manager (GCCM) method as opposed to the traditional design/bid/build method. Under the GCCM method, a public agency selects the contractor early on in the design process so the general contractor can participate in project development given complex scheduling, phasing, or coordination (RCW 39.10.340-.410). Staff believes the GCCM contracting procedure is not only appropriate but essential to the success of the City of Camas and the Camas-Washougal Fire Department's new Station 41 project. The site presents significant complexity involving **phased construction on an occupied site within a constrained area**, **coordination with essential public services**, and the need to **optimize cost and schedule through early contractor involvement**.

The existing adjacencies surrounding the site include restaurants, retail stores & shops, gas station, high-traffic fast food restaurants, libraries, City Hall, and shared community spaces hosting events, parades, markets, etc. It is important to the community that the adjacent community and access will remain fully operational during construction, requiring precise phasing, utility planning, and staging strategies to maintain emergency response capacity throughout the project. These challenges are best addressed during early design by a GCCM who can shape the construction approach, not merely respond to it via the traditional design/bid/build process.

GCCM Process: All "public bodies" in Washington – defined in RCW 39.10.210 as "any general or special purpose government in the state of Washington, including but not limited to state agencies, institutions of higher education, counties, cities, towns, ports, school districts, and special purpose districts" – may use GCCM contracting method.

Agencies wanting to use GCCM must obtain approval from the state Project Review Committee (PRC), which is appointed by the Capital Projects Advisory Review Board (see RCW 39.10.240-.290). The PRC evaluates whether the project meets at least one of the criteria outlined in state law for use of the process and whether the agency has the needed expertise. The City of Camas presented their request to utilize the GCCM method to the PRC in July 2025 and received approval with affirmation from the committee that this project is a perfect example for the use of the GCCM method.

Competitive Process: As with the traditional design/bid/build process a competitive process was conducted to select a general contractor/construction manager. The City of Camas selects the GCCM through a competitive qualifications and price based process through a request for proposals (RFP/RFFP) and sealed bids for general conditions and fee, according to the requirements of RCW 39.10.350-.370. The selection process for this RFFP was conducted in three stages. **Stage 1** consisted of the submittal of statement of qualification (SOQ). **Stage 2** was an interview with the most qualified firms from Stage 1. **Stage 3** included a shortlist of the most highly qualified firms from stage 2 and asked to submit a Fee Proposal (RFFP) with the Contractor's Fee stated as a percentage of the advertised Maximum Allowable Construction Cost (MACC) and a fixed amount for Specified General Conditions Work.

Awarding the Contract: The City of Camas must select the firm submitting the highest scored final proposal using the evaluation factors and relative weighting published in the RFP. The City identified the scope of work in the RFP and with council approval will enter a preconstruction services contract with the GCCM.

Once the design is 90% completed, the project committee and GCCM will establish the maximum allowable construction cost (MACC) and the total contract cost, as outlined in RCW 39.10.370 which is based on cost estimation from the City's estimator and the GC's estimator. The MACC amount will be the compilation of multiple "Mini-MACC" bid packages of the various sub-contractors and building component costs.

Staff Recommendation: After completing the RFP #FAC25004 process for GCCM services the **Howard S. Wright** company has been identified as the highest scoring bidder. As such staff seeks City Council authorization for the Mayor or designee to sign the Pre-Construction Services Agreement and the associated Terms and Conditions establishing the framework for collaboration between the City and the GCCM during the design and pre-construction phases.

Once the project design reaches ninety percent (90%) completion and the Maximum Allowable Construction Cost (MACC) has been established based on multiple Mini-MACC bid packages that together comprise the Total Contract Cost (TCC), the Mayor or designee will be authorized to execute the Guaranteed Maximum Price (GMP) Amendments on behalf of the City Council, provided that the final contract amount does not exceed the established target construction GMP of $18,382,518 plus sales tax.

In the event the proposed contract amount exceeds the established construction GMP amount, the Fire Chief and project team shall return to the City Council to present the revised contract value for approval prior to execution of the final GMP agreement.

RESOLUTION NO. 25-015

A Resolution related to the award of request for proposals for General Contractor / Construction Manager Services for the Camas-Washougal Fire Department New Headquarters and Station 41 project.

WHEREAS, City of Camas issued a Request for Proposals pursuant to the procedures outlined under RCW 39.10.340-.410 for General Contractor/ Construction Manager (GC/CM) Services RFP#FAC25004 and duly advertised for two consecutive weeks seeking qualified firms to participate in a three-stage selection process to provide GC/CM services for the Camas-Washougal Fire Department New Headquarters and Station 41 project; and

WHEREAS, the City established a selection committee to review the Proposals as required by law; and

WHEREAS, of the five firms who submitted a Statement of Qualifications (stage one), three participated in an interview (stage two). The selection committee then invited two firms to submit a fixed cost proposal for the Specified General Conditions Cost and a Fee percentage to include profit, bond and insurance to be applied to the estimated Maximum Allowable Construction Cost (stage three), with the firm to be selected based on scoring from both stages two and three; and

WHEREAS, the selection committee reviewed the cost proposals. The firm with the highest score from stage two and stage three was Howard S. Wright Construction, of Portland, Oregon; and

WHEREAS, the pricing proposed by Howard S. Wright includes a fixed amount of $1,193,000 for the Specified General Conditions and a 4.67% fee to be applied to the Total Estimated Maximum Allowable Construction Cost (MACC) of $18,300,000, resulting in a Total Proposal Price of $2,047,619; and

WHEREAS, this amount will be adjusted in the final agreement to reflect the final MACC, which will be established upon completion of multiple Mini-MACC bid packages that together comprise the total project construction cost; and

WHEREAS, based on the results of the Request for Qualifications, the City intends to award RFP# FAC25004 for GC/CM Services for the Camas-Washougal Fire Department New Headquarters and Station 41 Project to Howard S. Wright Construction; and

WHEREAS, the Council intends to authorize the Mayor or designee to enter into a Preconstruction Services Agreement with Howard S. Wright Construction, for a limited scope of services not to exceed $125,000. Preconstruction Services will be complete once the Maximum Allowable Construction Cost is established; and

WHEREAS, the Council intends to authorize the Mayor or designee to execute all Guaranteed Maximum Price (GMP) Amendments for the Project, on the condition that the final contract price does not exceed the established construction GMP of $18,382,518, plus sales tax.

NOW, WHEREFORE, BE IT RESOLVED BY THE COUNCIL OF THE CITY OF CAMAS, WASHINGTON AS FOLLOWS:

1. Based on the results of the Request for Qualifications, the City intends to award RFP# FAC25004 for GC/CM Services for the Camas-Washougal Fire Department New Headquarters and Station 41 Project to Howard S. Wright Construction.
2. The City Council hereby approves and authorizes the Mayor or designee to sign the Pre-Construction Services Agreement and the associated Terms and Conditions establishing the framework for collaboration between the City and the GC/CM during the design and pre-construction phases, subject to the conditions set forth herein.
3. Once the project design reaches ninety percent (90%) completion and the Maximum Allowable Construction Cost (MACC) has been established, and based on multiple Mini-MACC bid packages that together comprise the Total Contract Cost (TCC), the Mayor or designee is hereby authorized to execute the Guaranteed Maximum Price (GMP) Amendments on behalf of the City Council, provided that the final contract amount does not exceed the established target construction GMP of $18,382,518, plus sales tax.
4. In the event the proposed contract amount exceeds the established construction GMP amount, the Fire Chief and project team shall return to the City Council to present the revised contract value for further Council review and approval prior to execution of the final GMP agreement.

ADOPTED at a regular meeting of the Council this 17th day of November, 2025.

SIGNED: _____
MAYOR

ATTEST: _____
CLERK

Approved as to form:

_____
City Attorney