

From: [Jose Alvarez](#)
To: [Jeffrey Delapena](#)
Subject: FW: Rohrer UGA Expansion Request: AG De-Designation Report
Date: Monday, December 2, 2024 4:27:16 PM
Attachments: [image001.png](#)
[East Ridgefield Ag Analysis.pdf](#)

Jeff – For the record.

From: Claire Lust <Claire.Lust@ridgefieldwa.us>
Sent: Friday, October 25, 2024 1:31 PM
To: Jose Alvarez <Jose.Alvarez@clark.wa.gov>
Cc: Ezra L. Hammer <elh@jordanramis.com>
Subject: Rohrer UGA Expansion Request: AG De-Designation Report

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Jose,

Please find attached the Agricultural Resource Land Analysis for Determination of De-Designation prepared for Parcel 215111000. This parcel (the Rohrer property) is the subject of an owner-initiated site-specific UGA expansion request.

The City supports inclusion of site-specific expansion requests adjacent to the existing Ridgefield UGA, including the Rohrer property, in the DEIS land use map so their potential inclusion in the UGA may be studied moving forward. We ran this parcel through our land use model assuming medium density residential zoning with a mixed-use overlay and found it could yield up to 100 housing units (80 affordable to households earning less than 80% AMI) and 8 jobs.

Thank you,



Claire Lust

Community Development Director | Community Development

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JOHNSON
ECONOMICS



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

PREPARED FOR
WILLIAM AND KARRI ROHRER
OCTOBER 2024

JOHNSON ECONOMICS, LLC
621 SW Alder St, Suite 506
Portland, Oregon 97205



**JOHNSON
ECONOMICS**

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I. INTRODUCTION

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

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

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

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

II. EXECUTIVE SUMMARY

The property is characterized by urban growth. It joins the Ridgefield urban growth boundary (UGB), and over 550 new homes have been built within a mile of the property since 2017. Developed land close to the property is primarily residential and industrial, though immediately surrounding parcels are mostly agricultural.

Public facilities and services are generally available at the subject property. The site is outside the City of Ridgefield utility service areas, though access would be available upon annexation into the Ridgefield UGA. Schools and emergency services are within five miles and the nearest hospital is about seven miles away.

The soils on the subject property are within a range of classifications and are suitable for some agricultural uses, including haying, which is the property’s current use. The property’s water right claim authorizes water use for irrigation, but only of one acre. In addition, the productivity of current farm operations is below a profitable level.

The property is designated as agricultural land under the Current Use program, a tax deferral that reduces the taxable value of each parcel. The total assessed fair market value of land in the parcels is over \$770,000, almost two the current taxable value, rendering them infeasible to purchase for anything other than development.

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

Ridgefield is also trending towards more residential and commercial use and less agricultural use. From 2017 to 2022, Ridgefield’s population increased by over 200%, and over 3,000 new residential units (2,500 single-family homes) were permitted. Furthermore, over 1.4 million square feet of commercial and industrial space is in planning or under construction within a mile of the subject property.

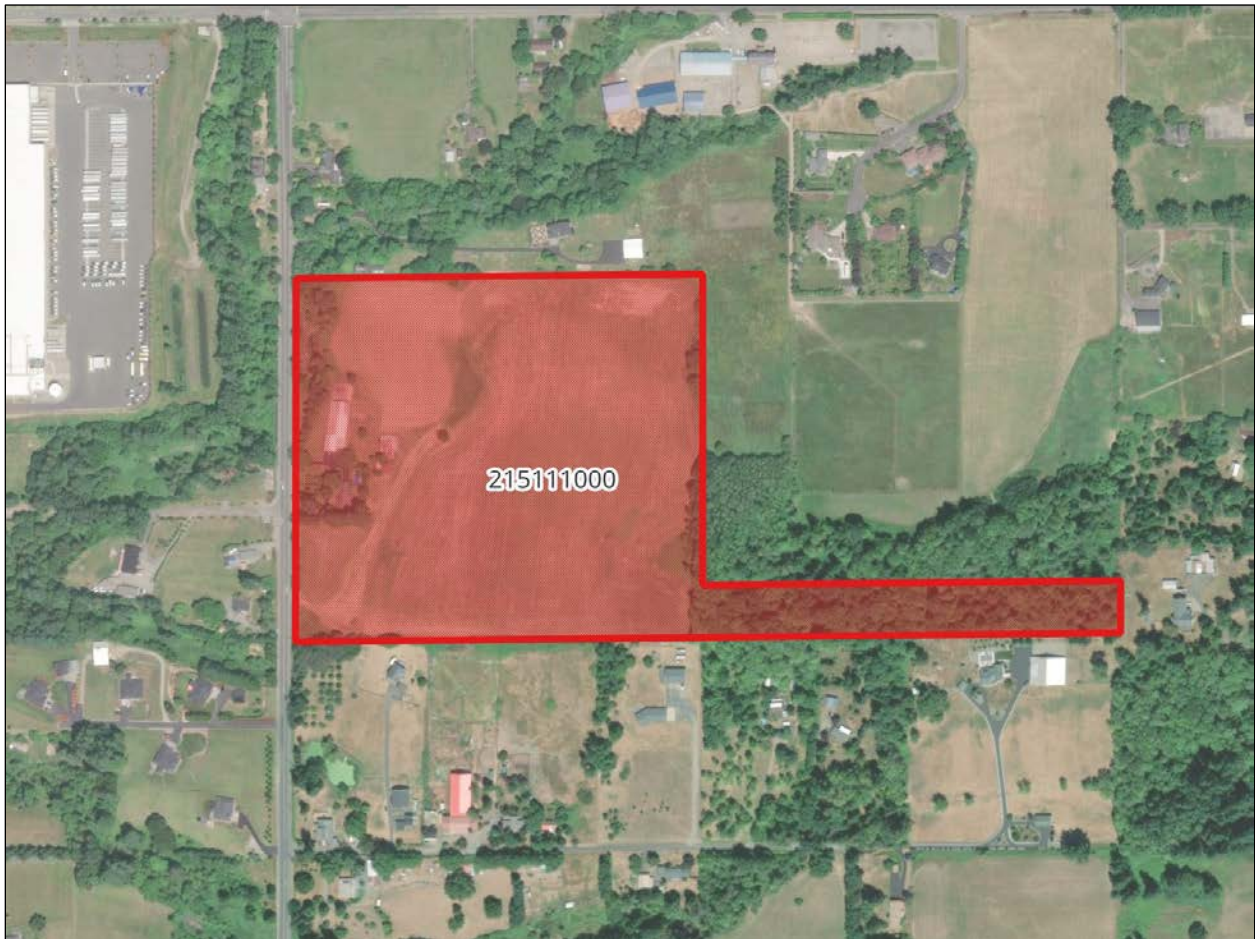
We find that the subject property does not meet the criteria of agricultural resource land as defined by the Washington Growth Management Act, and therefore, we recommend de-designation.



III. SITE ANALYSIS

The subject property is a 39-acre parcel, 215111000, mapped with its ID number below. Its address is 25305 NE 10th Avenue, Ridgefield. The parcel is currently zoned for agricultural use.

FIGURE 3.1: SUBJECT PROPERTY WITH PARCEL ID



SOURCE: Clark County, JOHNSON ECONOMICS

PROPERTY BACKGROUND

The Rohrer family has owned the property for over 20 years. It was part of Mountain View Dairy until 2021, when the land was transferred to William and Karri Rohrer. In 2022, it was placed into a trust.

There are six buildings on the parcel. The farm buildings were built from 1930 (the barn) to 1950-1960 (second barn, general purpose building, loafing shed). The main home was built in the 1950s. According to the Clark County Assessor, the farm buildings are in average to worn out condition. There is one additional smaller building on the south side of the parcel; it is not pictured in the following aerial.



FIGURE 3.2: BUILDINGS ON SUBJECT PROPERTY, 2021



SOURCE: Google Earth, JOHNSON ECONOMICS

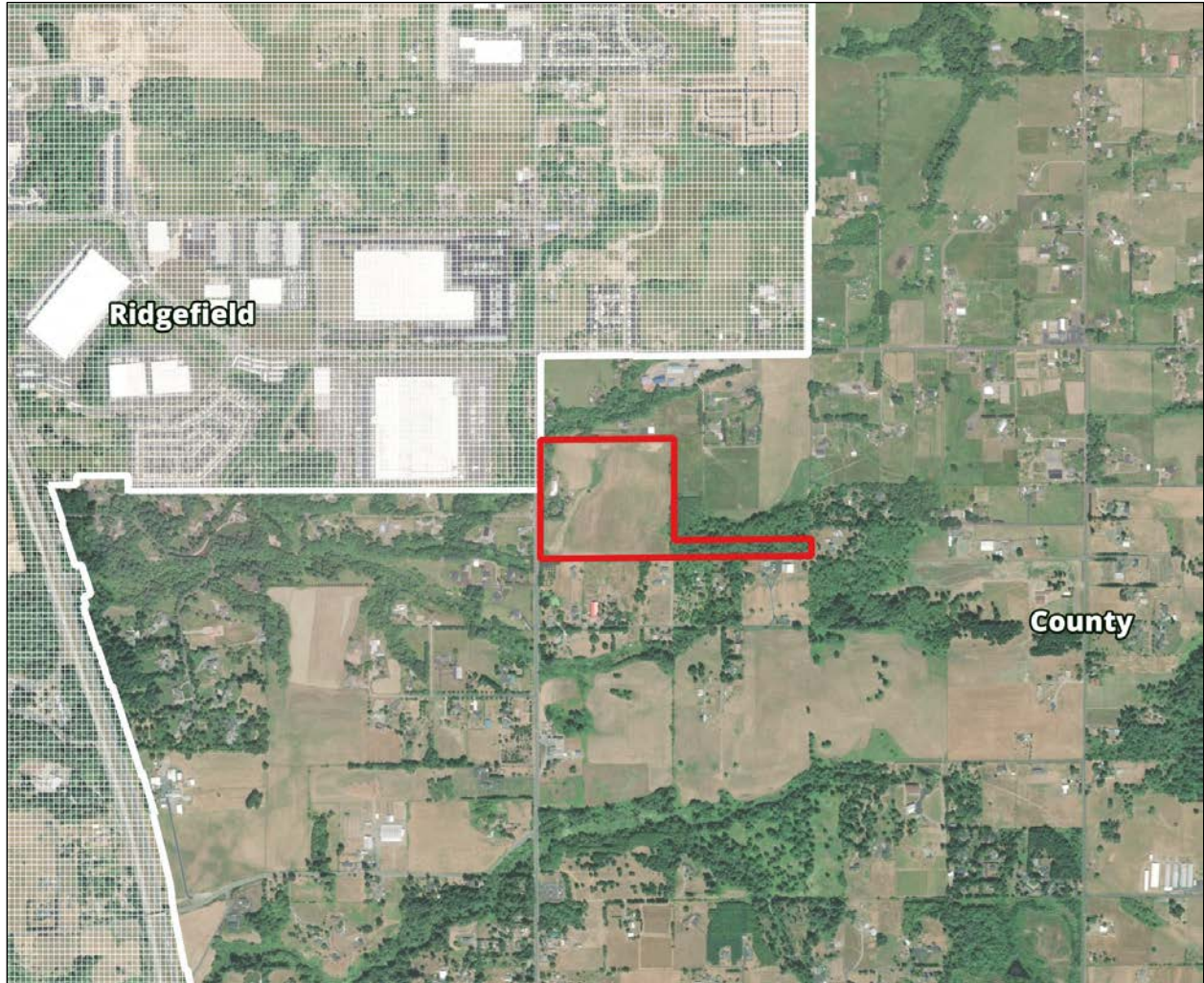
The parcel is within the Current Use program and has been since the development of Clark County's comprehensive plan, adopted in the 1990s. Current Use allows open space, timber, agricultural, and forest lands to be taxed at the value of their current use, rather than at their assessed value. This program is a tax deferral, so if the lands are withdrawn, the owner must pay at least seven years of back taxes at the assessed value, plus interest in some cases. This is detailed later in the report.



IV. CHARACTERIZATION OF URBAN GROWTH

The subject property is adjacent to the Ridgefield Urban Growth Boundary to the west. The parcels on the inside edges of the Ridgefield UGB are primarily industrial and residential. These boundaries were last updated in 2022, according to Clark County's GIS system.

FIGURE 4.1: RIDGEFIELD URBAN GROWTH BOUNDARY, 2022

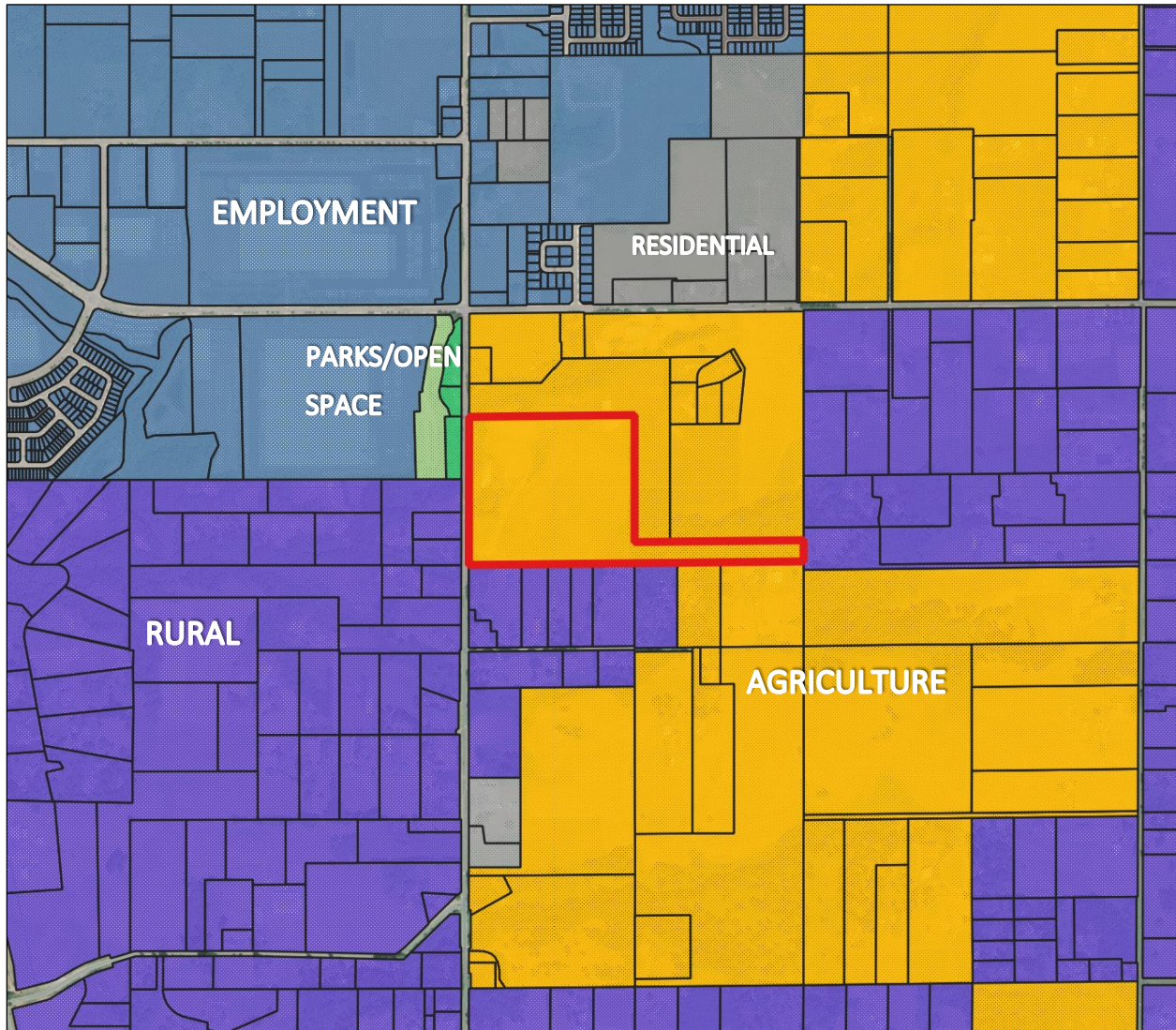


SOURCE: Clark County, JOHNSON ECONOMICS

The subject property is primarily zoned for agricultural use. Agricultural zoning continues to the northeast and southeast of the property. The land to the northwest of the subject property is zoned for employment use, although there are a few parcels zoned for residential use. Land immediately to the east and to the southwest is zoned for rural use. There are no zoning overlays on this property.



FIGURE 4.2: CLARK COUNTY ZONING, SUBJECT AND SURROUNDING PROPERTIES



SOURCE: Clark County, JOHNSON ECONOMICS

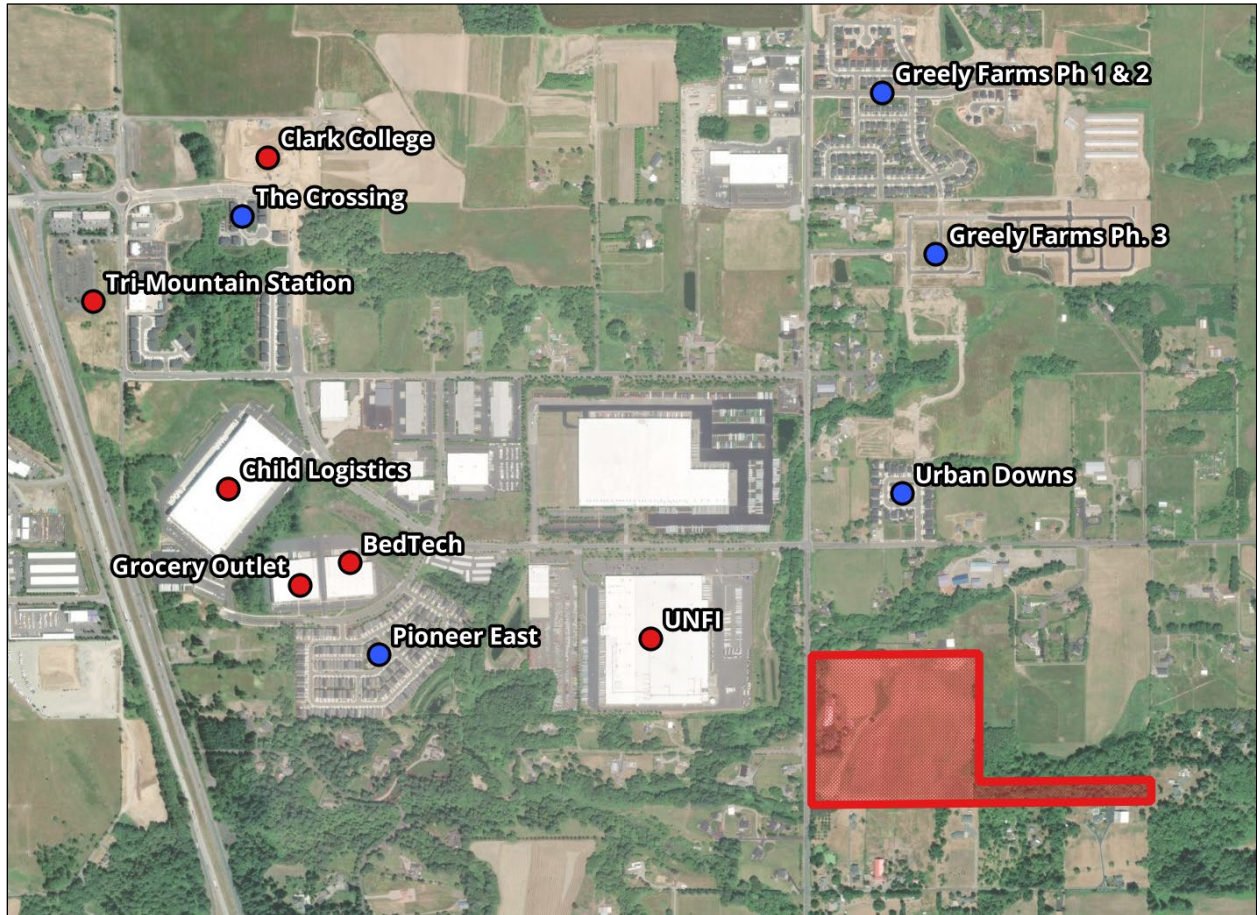
Within about a mile of the subject property, four subdivisions have been built out since 2018. Almost immediately to the north is Urban Downs, a 27-unit subdivision completed in 2019, and north of that is Greely Farms. This was built starting in 2019 with 185 units in its first two phases. The third phase, which has 179 units, is still under construction. About half a mile to the west is Pioneer East, completed in 2022 with 209 single-family homes, and farther north is The Crossing, a 132-unit townhome development completed in 2023.

There are also several commercial, educational, and industrial developments within the same radius. Tri-Mountain Station, a proposed nine-building commercial center, is waiting on permits. Clark College at Boschma Farms, opening in 2025, will specialize in advanced manufacturing technologies, reflecting Ridgefield's large industrial sector. The



remainder are small to large warehouse buildings. These developments are mapped below: blue points are residential, and red points are commercial/industrial/educational buildings.

FIGURE 4.3: NEW DEVELOPMENTS IN PROXIMITY, 2024



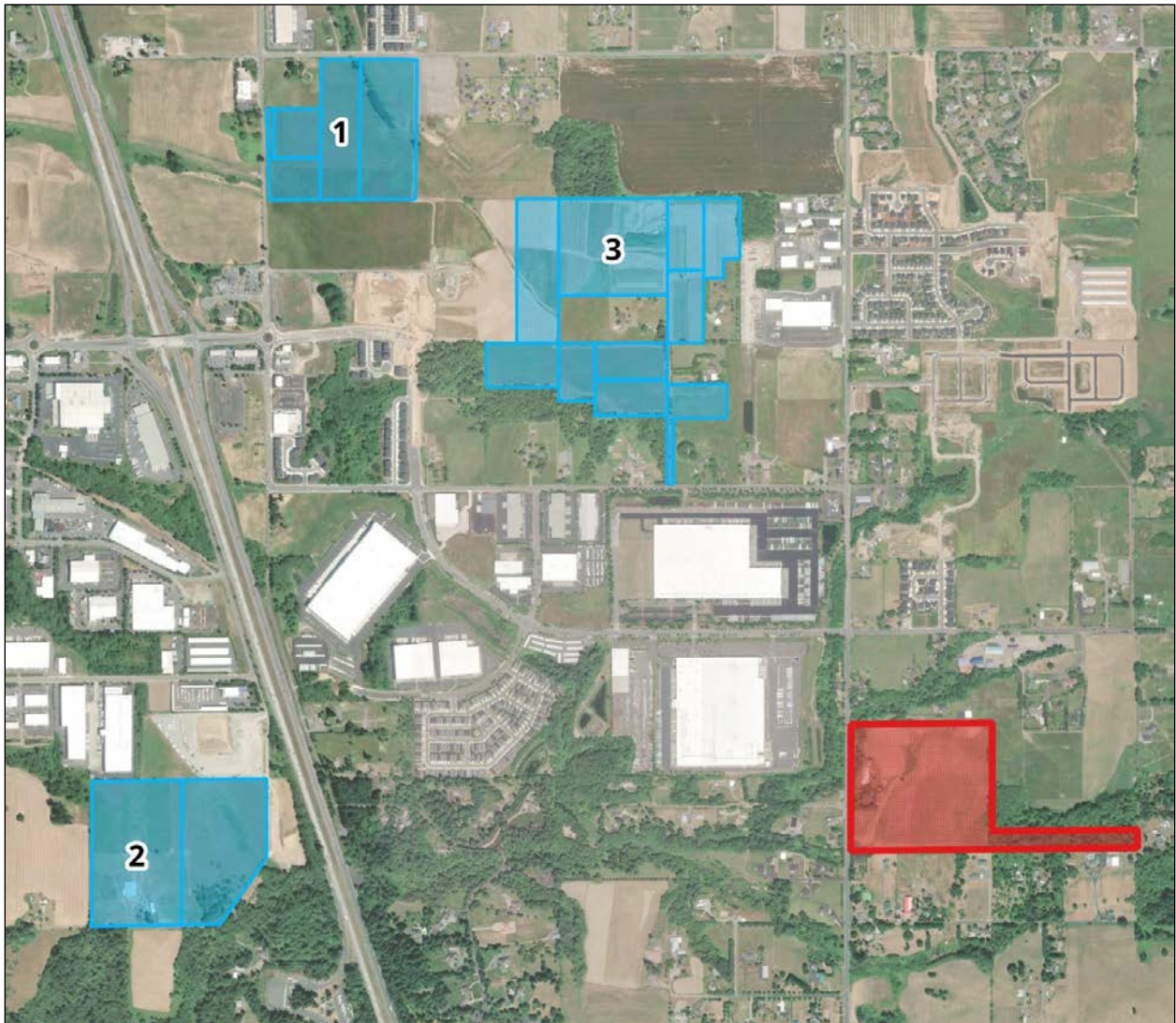
SOURCE: Clark County, JOHNSON ECONOMICS

About four miles northwest of the subject property is the Cowlitz Tribe reservation. The first major development in that area was the Ilani Casino in 2016, followed by several small commercial developments (gas stations, convenience stores) at the Interstate 5 interchange, and then expansions to Ilani's hotel, parking garage, and conference center.

Seven parcels near the subject site were recently listed for sale (clusters 1 and 2, shown below). There are also twelve parcels that will be listed for sale soon (cluster 3, shown below). These parcels are advertised as zoned for commercial, employment, and industrial uses, though the parcels in clusters 1 and 3 are currently designated as agricultural land under Current Use, according to Clark County land records.



FIGURE 4.4: LAND FOR SALE IN PROXIMITY, 2024



SOURCE: Clark County, local brokers, local media, JOHNSON ECONOMICS



V. CURRENT AGRICULTURAL PRODUCTION

About 28 acres of the subject property appear to currently be farmed. Over the last 20 years, only grass has been grown and hayed on this portion. The remainder of the parcel contains a large stretch and some smaller areas of trees, a home, and a few farm buildings.

FIGURE 5.1: STREET VIEW OF SUBJECT PROPERTY, 2021



SOURCE: Google Earth, JOHNSON ECONOMICS

Within half a mile of the subject site, there are several other properties in agricultural use, including two horse boarding stables and a training center, a flower farm, and an alpaca ranch. Like the subject property, most of these are designated as agricultural land under Current Use. A large property to the north that appears to have been hayed through 2017 is in development for residential homes. This development, Urban Downs, seems to be in its final stages.



VI. COMMERCIAL SIGNIFICANCE FOR AGRICULTURE

LAND CAPABILITY CLASSIFICATION

Land capability classification refers to the suitability of soils for growing field crops. Class I soils are the most versatile soils and Class VIII the least. Generally, land with soil classified at IV or higher is unsuitable for most crops but may be appropriate for pasture/grazing use.

The subject property is made up of a mix of soils and land capability classifications. Most of the property area is Gee silt loam (GeB), 0-8 percent slopes. This is Class II soil, which, according to the Clark County Assessor, is suitable for most crops and pasture. The northwest corner is also Gee silt loam (GeE), 20-30 percent slopes and Class IV, suitable for a few crops. There are also a few areas of Odne silt loam (OdB). This soil type is Class VI and generally not suitable for most crops.

FIGURE 6.1: USDA SOIL CLASSIFICATION, 2024



SOURCE: USDA Web Soil Survey, JOHNSON ECONOMICS

WATER RESOURCES

The subject property has two attached water right claims: one for groundwater (G2-004320CL) and one for surface water (S2-004321CL). There are no other water rights, including vested water right certificates, that are appurtenant to the subject property.



Importantly, a water right claim is not a water “right.” See generally RCW 90.14. While a water right claim holder can continue to use water under a claim, a claim is not a vested right until it is confirmed through a judicial adjudication process. RCW 90.14.081. A judicial process may result in the claim being confirmed, or it may result in the claim being denied in whole or in part. A claim statement, including the ones on file for the claims attached to the subject property, serves as “prima facie evidence of the times of use and the quantity of water the claimant was withdrawing or diverting as of the year of the filing.” RCW 90.14.081. The attributes of the water right claims attached to the subject property are summarized in this section.

The source for the groundwater right claim is identified as an “underground spring.” Springs are recognized as a surface water source under RCW 90.44.030, and it is not clear whether the point of withdrawal for this water right has a well or has otherwise been improved to facilitate water withdrawal. The claimed uses are domestic general, stockwater, and irrigation of 1 acre. The claimed rate is “5-10” gallons per minute (“gpm”) in an amount up to 6 acre-feet (“AF”) per year. It is unusual for a claim to list a range of rates, and we do not know how a court would interpret this as part of a judicial review process to determine groundwater claims. The applicable claim form indicates that the water use happens “continuously” throughout the year, but it is not clear whether this is meant to apply to irrigation use or only to domestic and stockwater use.

The source for the surface water claim is a “spring,” but it is listed at a different location than the “underground spring” in the surface water claim. The claimed use is livestock use, and this is identified in the online records of the Department of Ecology. However, the claim form on file for this claim also indicates that the claimant claims “34 acres” for irrigation. Further, per the claim form, the claimant is claiming 34 acres despite only irrigating 10 acres at the time the claim was filed. The total claimed rate is “0.02.” We presume this is “cubic feet per second (“cfs”),” but there is no associated unit. Additionally, the claim form indicates that the claimant only uses between 0 and 0.01 cfs (cfs is assumed as unit of measurement). Similarly, the claim form indicates that the claimant uses 0-1 AF of water per year, but it claimed 2 AF. Given that the claimant was, by his own admission, not using the full claimed amount of water on the year of filing the claim, it is unlikely that an adjudication process would recognize the upper bounds set forth in this claim as prima facie evidence of the attributes of the claim.

AVAILABILITY OF PUBLIC FACILITIES

To the west of the subject property is Northeast 10th Avenue, which has two travel lanes, each about 12 feet wide. These are separated by a double yellow/broken yellow line. There are no bike lanes or sidewalks. The posted speed limit along the subject property is 50 miles per hour, and the closest intersection, Northeast 10th Avenue and Northeast 259th Street, is controlled with stop signs. Northeast 10th Avenue, north of South 5th Street, is included in the Ridgefield Six-Year Transportation Improvement Plan (2024-2029) as a development-built project; it will be completed by a private developer, as part of a larger project, rather than by the city.

The subject property is currently under the jurisdiction of the Rural/Resource Sewer District. However, it is adjacent to the City of Ridgefield Wastewater Service Area on part of the west boundary of the site. The jurisdiction recently extended the sewer line east from the planned Ridgefield Elementary School site on North 10th Street/Northwest 279th Street to North 10th Avenue, about a mile north of the subject property. There is also a new pumping station for the residential homes in development on North 10th Avenue.

Water is also provided by Clark Public Utilities. The City of Ridgefield is in the process of updating their Water System Plan, which is expected to be completed around fall 2024. As of early October 2024, the plan has not been updated. This update could provide more information about where to look for water system expansions in the future.

AVAILABILITY OF PUBLIC SERVICES

The subject property is about two miles southeast of the Clark-Cowlitz Fire Rescue Station 21, within the Clark-Cowlitz Fire District. It is about five miles east of the Ridgefield Police Department. The nearest medical center with an emergency department is Legacy Salmon Creek Medical Center, about seven miles to the south of the subject



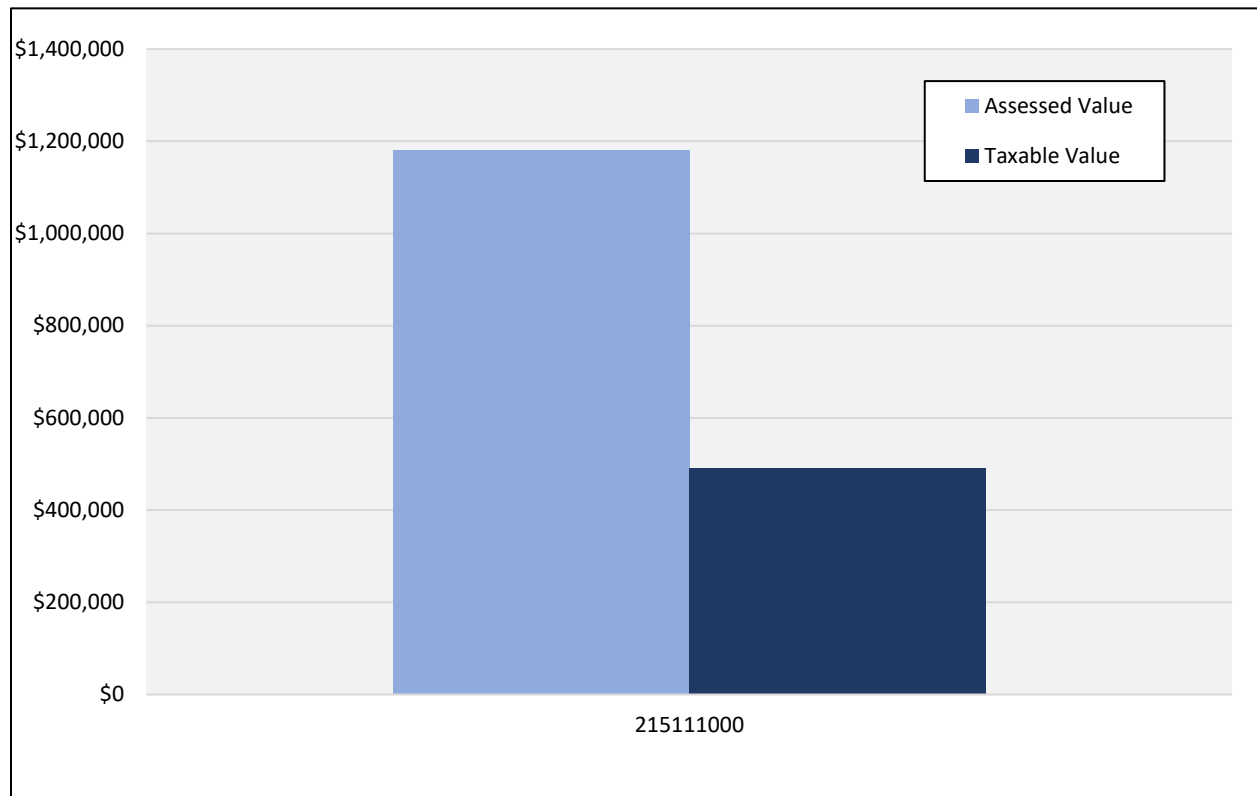
property. There is a primary and urgent care clinic about two miles northwest of the subject property, on Pioneer Street.

The property is within the Ridgefield School District, about 4.5 miles west of Union Ridge Elementary School. The district is set to begin construction on a new elementary school on a large lot 1.5 miles northwest of the subject property, if voters approve the construction cost. Ridgefield High School and View Ridge Middle School are about 2.5 miles to the southwest.

TAX STATUS

The parcel is designated under the Current Use program as agricultural land, so it is taxed at a reduced value from its assessed market value. The graph below illustrates the difference between the assessed value and the taxable value under this program.

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



SOURCE: Clark County Assessor, JOHNSON ECONOMICS

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

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



obtain through lawful means, a monetary profit from cash income by producing an agricultural product” (RCW Chapter 84.34 and 84.33).

While the parcels currently meet these requirements, if the parcels are sold for non-agricultural use, they will need to be withdrawn from the program. According to Clark County Assessor records, the parcels have been designated under Current Use since at least 2006, so removing them from the program would incur only back taxes and interest and no additional penalties. Upon withdrawal from Current Use, we estimate the additional back taxes plus interest to be around \$80,700.

PROXIMITY TO URBAN GROWTH AREAS

The subject property is adjacent to the Ridgefield Urban Growth Boundary. It is within one mile of five residential projects that were recently built or that are under construction, with a total of over 700 new homes. Additionally, there are multiple commercial and industrial developments within a mile of the subject property. This demonstrates proximity to urban growth areas.

PARCEL SIZE

According to the Clark County Assessor, the parcel is 39.55 acres in size. About 70% of the parcel (28 acres) is currently being farmed. This is significantly larger than residential parcels in subdivisions around the site, which range from 0.07 to 0.2 acres. Industrial parcels to the west range from 6 to 40 acres; these are closer in size to the subject property.

LAND USE PATTERNS & INTENSITY OF SURROUNDING LAND USE

To the north, south, and east are Current Use-designated agricultural parcels. There is also some land that has been farmed in the past but is under development now. To the west are commercial/industrial/employment centers – many permitted and built within the last 5 years.

New residential development is taking place primarily to the west and north, inside the Ridgefield UGA. As the city grows, new residential subdivisions will move towards the current UGA boundary and potentially even adjoin the subject property, as is the case with the Urban Downs and Pioneer East subdivisions. Agricultural use of the subject property would stand in contrast to anticipated land use patterns of surrounding areas.

HISTORY OF PERMITS ISSUED NEARBY

Since 2017, five subdivision permits have been issued within one mile of the subject property. These have added 553 new homes to the area, not including 179 homes under construction. Four industrial building permits have been issued within the same time frame, leading to over 1,260,000 completed square feet of industrial space. Clark College at Boschma Farms, 49,000 square feet, is under construction, and 130,000 SF of commercial space is under permit review. Permits issued nearby indicate strongly that the subject property is characterized by urban growth.



FIGURE 6.2: RESIDENTIAL, COMMERCIAL, AND INDUSTRIAL BUILDING PERMITS ISSUED SINCE 2017

#	Project Name	Address	Status	Permit Year	Units
1	Greely Farms Ph. 3	S of Russet Pl	U.C.	2019	179
2	Pioneer East	7143 S 11th St	Complete	2017	209
3	Greely Farms Ph. 1 & 2	N 4th St & N Russet Pl	Complete	2019	185
4	Urban Downs	S Goose Loop & S 88th Ave	Complete	2019	27
5	The Crossing	441 S 69th Pl	Complete	2020	132
Total Residential Units					732

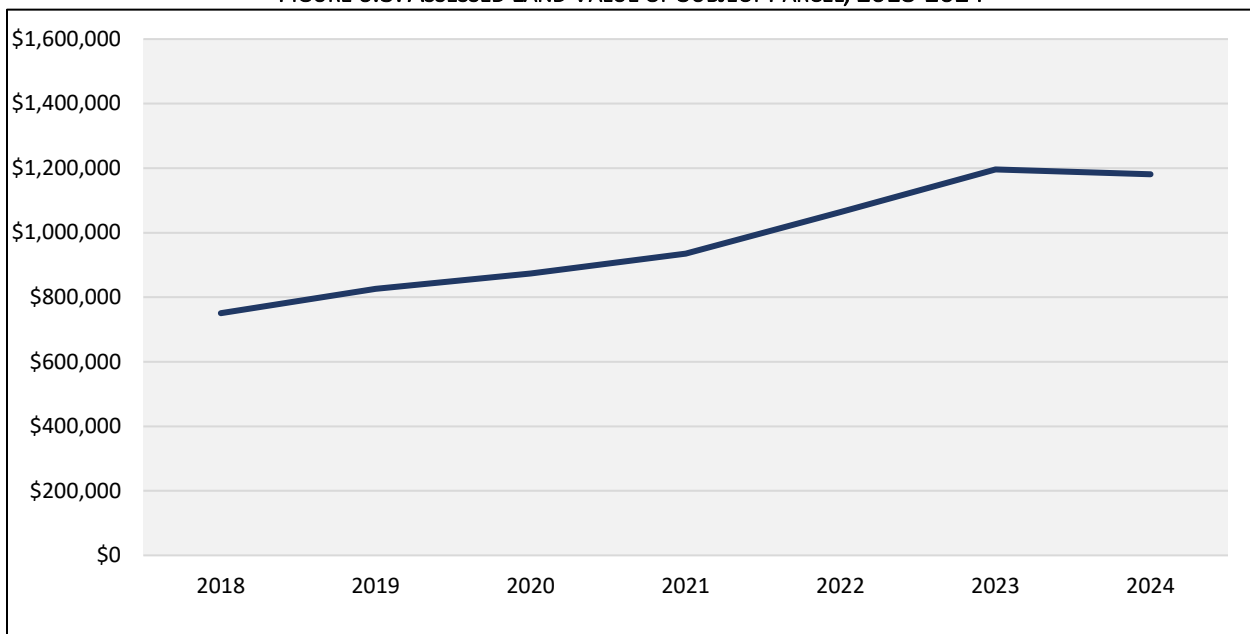
#	Project Name	Address	Type	Status	Permit Year	SF
6	Tri-Mountain Station	Pioneer St & S 65th Ave	Commercial	Permit Review	N/A	130,205
7	Clark College	Pioneer ST & NE 259th St	Education	U.C.	2023	49,000
8	Grocery Outlet Distribution Ctr	7000 S 10th St	Industrial	Complete	2018	112,526
9	BedTech Ridgefield	7200 S 10th St	Industrial	Complete	2018	106,167
10	UNFI Dist. Ctr. Expansion	7909 S Union Ridge Pkwy	Industrial	Complete	2018	577,000
11	Child Logistics	7001 S Union Ridge Pkwy	Industrial	Complete	2021	468,810
Total SF						1,443,708

SOURCE: CoStar, Ridgefield Planning Department, Google Earth, local media, JOHNSON ECONOMICS

LAND VALUES UNDER ALTERNATIVE USES

Under the Current Use program, the parcel has a taxable value of \$492,000, which is less than half its assessed market value of \$1.2 million. This includes the value of a home and several other buildings, assessed in total at \$410,000, which is most of the above taxable value. The assessed prices reflect development values and are much higher than what a farmer would reasonably pay to use the land for agricultural production. Assessed land values have also increased significantly over the last few years. The graph below shows the assessed value over time; this value increased by 57% from 2018 to 2024.

FIGURE 6.3: ASSESSED LAND VALUE OF SUBJECT PARCEL, 2018-2024





SOURCE: Clark County Assessor, JOHNSON ECONOMICS

PROXIMITY OF MARKETS

The subject property produces hay, for which distance to markets can be variable. Currently, this hay is sold to a farmer in Goldendale, about 100 miles to the east. It is possible to sell hay locally, in rural areas of the county, to farmers with small numbers of animals. Larger amounts may be sold farther into the Willamette Valley, but this is less feasible at the subject property.

CROP PRODUCTIVITY

Hay farming is the most realistic option for farming at the subject property, especially given land capability and water availability. In Washington State, the average hay crop in 2022 yielded 3.1 to 5.2 tons per acre. County level data is not available, but a 2015 report to de-designate a property in Clark County estimated a yield of 2.0 tons per acre, so we estimate that actual productivity is at the lower end of the state average. The USDA Washington-Oregon Hay Report for early July 2024 estimates sale prices of \$250-300 per ton for good to premium quality hays. As of October 2024, sale prices are somewhat lower at \$150-280 per ton, but we will use July prices as a high estimate. From these we estimate maximum hay crop revenue to be \$1,300-1,560 per acre. If we assume exclusive hay production, selling all that is produced, and that there are about 28 acres usable for haying across the entire property, maximum revenue is \$36,400 to \$43,680 yearly. This figure only includes sales and does not consider any costs, which include labor, equipment, and fertilizer as well as transaction costs.

It may also be possible to utilize the subject property for pasture grazing, but with cattle production comes concerns for mud, odor, and nuisance conflicts with nearby residential and commercial areas. Given the proximity of residential and commercial areas, we do not consider this as a viable option.

The most significant cost associated with farming the subject properties, however, is the cost of buying or renting the land. The assessed market value of the subject property that is available for farming, which excludes the value of buildings, is over \$770,000. While there are no comparable farm sales in the area, it is unlikely that a farmer would pay that much for a small-scale farming operation. As it is not economically feasible to conduct agricultural operations on the subject property, it does not have long-term commercial significance for agriculture.

VII. THE STATE OF AGRICULTURE IN CLARK COUNTY

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

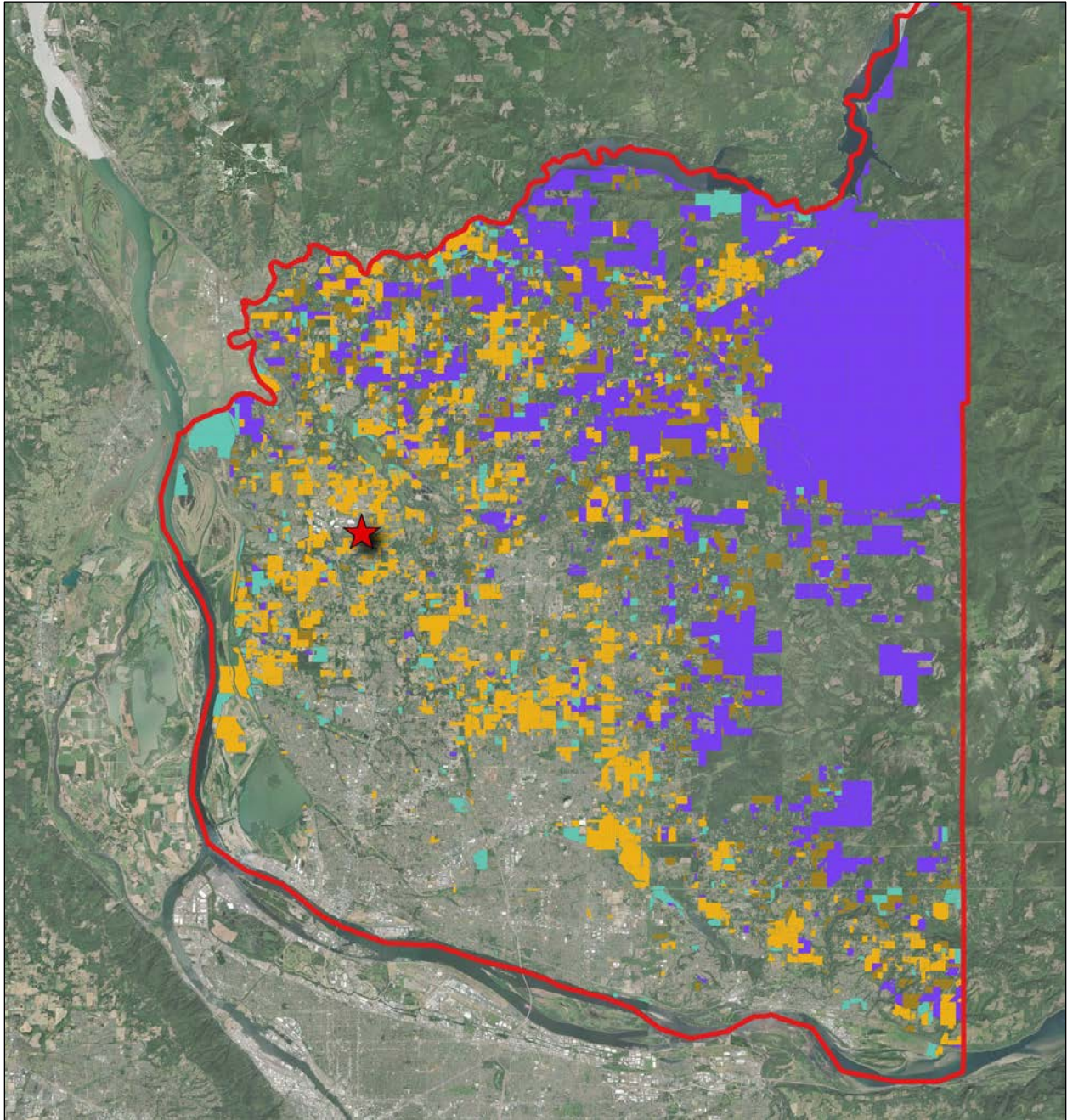
As of 2022, there were just over 1,900 farms in Clark County, according to the USDA. This includes 56,000 total acres, down 38% from 2017, when there were over 90,000 acres of land in farms. However, the number of farms in the county only decreased by 3%, suggesting that either a few large farms have ceased operations or that many farms have decreased in size.

On average, farms in Clark County are primarily small in size and scale: almost 70% of farms make less than \$5,000 in sales, and almost 90% of farms are smaller than 50 acres. Average farm-related income increased 132% from 2017 to 2022, but average net cash farm income is still negative at -\$230. The most produced crops in Clark County, by acreage, are hay (13,500 acres), Christmas trees (910 acres) and berries (855 acres).



Natural resource lands in Clark County are designated under the Current Use program, as described earlier in this report. About 36% of the county's land by area is classified under this program. Of the total land in Current Use, 25% is agricultural land (yellow), and the rest is open space (teal), designated forest land (purple), or timber land (brown). The subject property makes up about 0.1% of the total Current Use designated agricultural land area in Clark County.

FIGURE 7.1: CLARK COUNTY LAND UNDER CURRENT USE, 2024



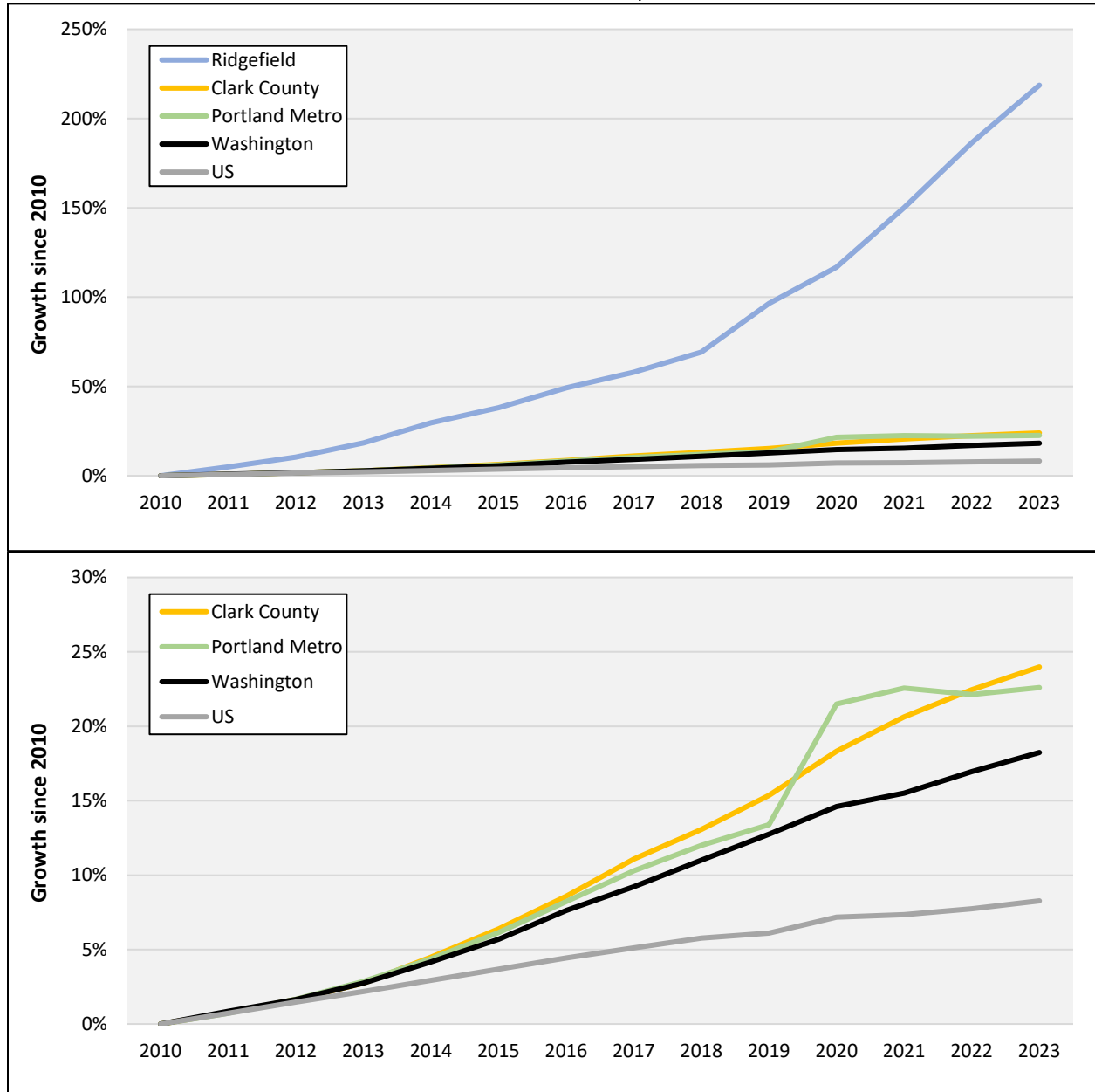
SOURCE: Clark County, JOHNSON ECONOMICS



POPULATION & DEVELOPMENT TRENDS

The county has seen population growth of almost 25% since 2010, which is equivalent to just over 100,000 people. Over that same period, Ridgefield saw a 219% increase in population, or just over 10,000 people. This is exceptionally fast compared to larger geographies, illustrated in the graphs below.

FIGURE 7.2: POPULATION GROWTH SINCE 2010, GEOGRAPHIC COMPARISON



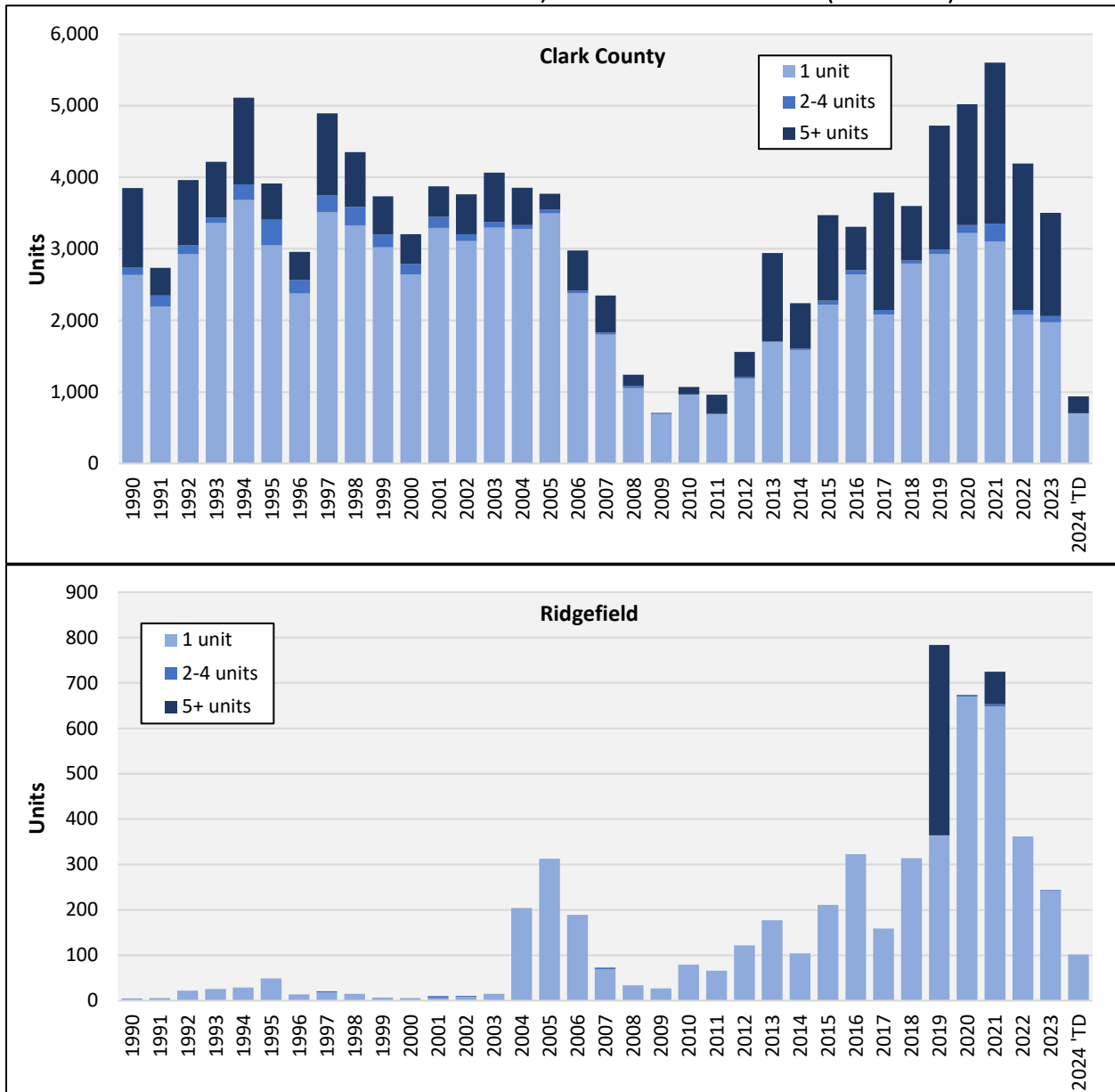
SOURCE: U.S. Census Bureau, Portland State University, WA Office of Financial Management, JOHNSON ECONOMICS

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



The pattern is different in Ridgefield, which saw little development until the early 2000s. At that point, it began to reflect the larger county trend, though residential development is mostly in single-family homes. The city has seen a few larger multifamily projects since 2018, reflecting its increased density.

FIGURE 7.3: RESIDENTIAL BUILDING PERMITS, CLARK COUNTY & RIDGEFIELD (1990-2024)



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

As Ridgefield continues to develop, and as the city’s population continues to grow at rates significantly above Portland and the broader metro area, more land will be needed for residential and commercial use. The city will not be able to plan for large new subdivisions or commercial centers without de-designating some of its agricultural land.



VIII. RECOMMENDATIONS

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

- The property has characteristics conducive to urban growth. It is adjacent to the Ridgefield UGB and in proximity to multiple new subdivisions and industrial sites. Parcels nearby that were previously designated as agricultural land are now selling as commercial or industrial land. Ridgefield is a fast-growing city characterized by a lack of residential and commercial land; its population has grown by over 200% since 2010. The GMA requirement for designation as agricultural land is that “the land is not already characterized by urban growth;” the property fails to meet this requirement.
- The property is currently being farmed, meeting the second GMA requirement of “the land is used or capable of being used for agricultural production.” However, we do not consider the property to be capable of being used for agricultural production other than haying. The property’s water claim only authorizes irrigation of one acre, and a significant section of the land currently being hayed has soil that is generally not suitable for farming. Several agricultural parcels around the subject site have slowed or ceased farming altogether in recent years.
- The property no longer has “long-term commercial significance for agriculture,” which is the third requirement in the GMA. The market value of this land for residential or commercial use is far higher than its assessed value for agricultural use. The values of these parcels reflect residential development values and are much higher than what a farmer would reasonably pay to use the land for farming. Additionally, the potential profit from producing hay is quite low, and the current hay crop is sold to one farmer outside of Clark County. Agricultural use of the subject property is not commercially significant.