

From: [Jeffrey Delapena](#)
To: desrochersinc@gmail.com
Cc: [Cnty 2025 Comp Plan](#); [Oliver Orjiako](#); [Jose Alvarez](#); [Bart Catching](#)
Subject: RE: Comp Plan Update - Agricultural Lands Study - Parcel #212794-000
Date: Monday, October 6, 2025 9:47:01 AM
Attachments: [Parcel 212794_000 AG Zone Change Oct 2025.pdf](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good day, Andrew,

Thank you for your feedback related to the Agricultural Lands Study for the 2025 Comprehensive Plan Update.

I have forwarded your comments to Staff and will enter these into the Index of Record.



Jeff Delapena
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COMMUNITY PLANNING

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From: A DesRochers <desrochersinc@gmail.com>
Sent: Monday, October 6, 2025 9:14 AM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Subject: Comp Plan Update - Agricultural Lands Study - Parcel #212794-000

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Hello -

Attached are comments for Parcel #212794-000 related to the Agricultural Lands Study that is part of the Comprehensive Growth Plan Update.

Thank you,

Andrew DesRochers

360-921-4278

I am writing this letter asking for consideration that a parcel of property that I own be considered for removal from AG zoning.

The parcel that I own is located at 2510 NW 299th Street, Ridgefield WA Parcel #212794-000 ("Parcel"). The Parcel is 14.38 acres and currently zoned AG-20. Zoning overlays are Urban Reserve-20 (UR-20), Industrial. Comprehensive Plan is AG and Comprehensive Plan Overlay is Industrial Reserve. I would like this property to be considered for Industrial zoning and removed from AG zoning for a few reasons.

The first reason the Parcel should be considered for a zone change is because it was assigned an incorrect zone in 1996.

In accordance with the WAC 365-190-050 Agricultural Resource Lands "Lands should be considered for designation as agricultural lands based on three factors:

- a. The land is not already characterized by urban growth. To evaluate this factor, counties and cities should use the criteria contained in WAC 365-196-310.
- b. The land is used or capable of being used for agricultural production. This factor evaluates whether lands are well suited to agricultural use based primarily on their physical and geographic characteristics. Some agricultural operations are less dependent on soil quality than others, including some livestock production operations.
- c. The land has long-term commercial significance for agriculture.

Based on these factors, the Parcel does not meet the requirements for designation as agricultural lands.

Included is a map showing the soil capabilities for agricultural use. As can be clearly seen on this map, the vast majority of the Parcel is composed of the lowest category of soil capabilities. The few small areas that have better soil capabilities are located near property lines and in areas where a building already exists. Also, as can be seen on this map, the Parcel has soil with the least agricultural capabilities of any neighboring property included in the AG zone.

Additionally, under WAC 365-190-050 (3.b) it states, "Some agricultural operations are less dependent on soil quality than others, including some livestock production operations." The Parcel also presents a few problems with livestock production operations. The I-5 freeway runs along the east boundary of the Parcel. In the last +/- 15 years that I have owned the Parcel, cars have left the freeway three separate times and destroyed my fences. Livestock released onto I-5 due to fences being destroyed is potentially deadly to the public and creates a huge liability to myself. Another reason livestock production on the Parcel is problematic is because the Parcel gets very muddy in winter. This causes very

significant erosion and livestock have become stuck in the mud. The mud becomes very deep along well-traveled pathways and one animal perished due to being stuck in mud.

These factors show the Parcel was incorrectly classified in the 1996 Growth Management Plan and should never have been zoned AG in the first place. To correctly zone this parcel in 1996, an Industrial zone should have been extended along the I-5 corridor probably north to parcel 21287000. That is where the Industrial Overlay ends. At that time, uses consistent with the Industrial zone existed along both sides of the corridor.

The second reason the Parcel should be considered for a zone change is because the Parcel has zoning overlays of Urban Reserve 20, Industrial and a Comprehensive Plan Overlay of Industrial. Overlays were placed on properties to reflect a 20-year time frame for growth. In past inquiries regarding zone changes on other parcels I own, I have been told by Clark County Long Range Planning Department that when the Comprehensive Plan was created, it is assumed that all parcels within Clark County were properly zoned. Following that line of thinking, applicable overlays were also properly assigned. Therefore 20 years later, parcels with overlays should be changed to the zone the parcel was overlayed with.

When the Comprehensive Plan was created in 1996, the UR-20, Industrial overlay was applied to parcels along the I-5 corridor, starting at the City of Ridgefield and extending north beyond the Parcel a short distance before coming to a stop. This shows the intent to designate all parcels with this overlay to the Industrial zone within 20 years of the Comprehensive Plan creation. If Clark County Long Range Planning is going to stand by their statement that all parcels in the county were assigned proper zones, and therefore proper overlays were assigned in 1996, the Parcel and all other parcels with the UR-20, Industrial overlay should have already had the Agricultural zoning removed since 20 years have passed since the adoption of the Growth Management Act .

The third reason the Parcel should be considered for a zone change is because more recent events have occurred that are very relevant to zoning of this parcel. The new proposed Urban Growth Boundary of the City of Ridgefield shows what is called the “North Industrial Expansion”. This expansion directly touches the south property line of the Parcel. Additionally, maps of the possible expansion of the Cowlitz Reservation show it touching the north border of the Parcel. Clearly these are significant changes in the vicinity of the Parcel that would qualify it for removal from AG zoning. Essentially this puts Industrial and Commercial uses on the north and south boundaries of the Parcel, along with I-5 along the east boundary.

At this time the Parcel at a minimum, and potentially the parcels to the west and southwest, should have the AG zone removed and the Industrial zone applied.

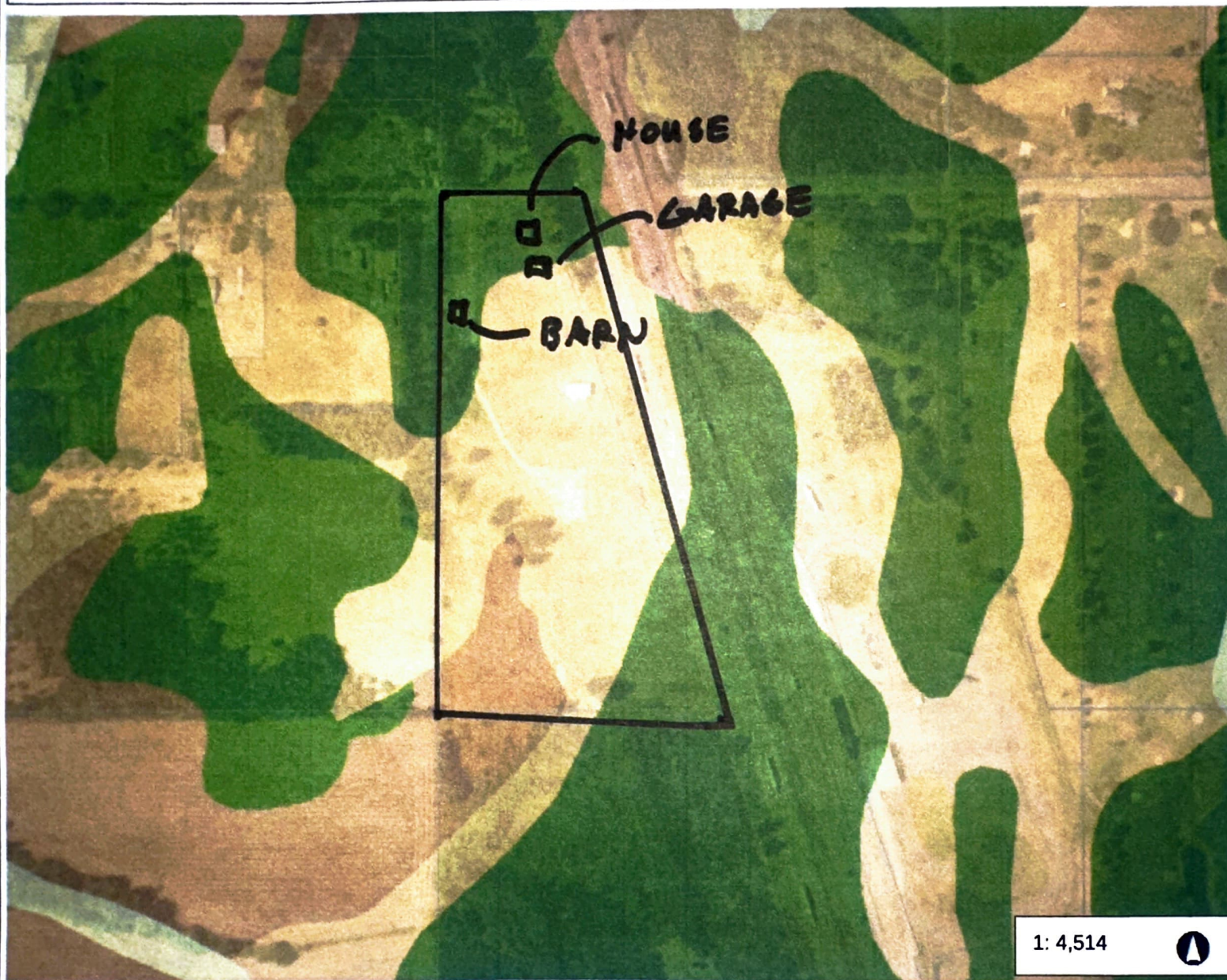
In conclusion, the Parcel should have never been assigned the AG zone when the Comprehensive Plan was created in 1996. Setting that aside, recent changes to the area certainly disqualify it from remaining in an AG zone.

Thank you for your consideration.

Sincerely,

Andrew DesRochers

360-921-4278



1: 4,514



752.3 0 376.17 752.3 Feet

WGS_1984_Web_Mercator_Auxiliary_Sphere
Clark County, WA. GIS - <http://gis.clark.wa.gov>

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Legend

☐ Taxlots

Soil Capabilities for Agriculture

- Prime agricultural soils Class I and II
- Prime agricultural soils Class III
- Good agricultural soils
- Fair agricultural soils
- Poor agricultural soils
- Water

Notes: