

**From:** [Jeffrey Delapena](#)  
**To:** [James D. Howsley](#)  
**Cc:** [Oliver Orjiako](#); [Jose Alvarez](#)  
**Subject:** RE: LaCenter east Ag Study  
**Date:** Thursday, January 29, 2026 1:38:00 PM  
**Attachments:** [irlogorqb184x21px\\_2c56842b-6adc-489a-adbb-eb59ba48026b.png](#)  
[regionalawards-multivear\\_2025\\_f8b21b49-2039-4446-9fe4-bfafd7ff404a.png](#)  
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[image003.png](#)  
[image004.png](#)

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Good day, Jamie,

Thank you for providing this feedback for the Hearing to select the Preferred Land Use Alternative.

I am forwarding to additional members of Staff. Your comments will be brought to the attention of Planning Commission ahead of tonight's continuation of the Hearing to select the Preferred Land Use Alternative. This will also be added to the Index of Record.

Best regards,



**Jeff Delapena**  
Program Assistant  
COMMUNITY PLANNING

564.397.4558



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**From:** James D. Howsley <jamie.howsley@jordanramis.com>  
**Sent:** Thursday, January 29, 2026 1:00 PM  
**To:** Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>  
**Cc:** James D. Howsley <jamie.howsley@jordanramis.com>  
**Subject:** LaCenter east Ag Study

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Jeff,

Would you share this with the Planning Commission it is an AG study for LaCenter's east of I-5 request. And also share this email as please note that the western property in this request was sold to the Cowlitz Tribe in early December.

Best,

Jamie

**James D. Howsley** | Attorney  
OR Direct: (503) 598-5503  
WA Direct: (360) 567-3913

**JORDAN**  **RAMIS**

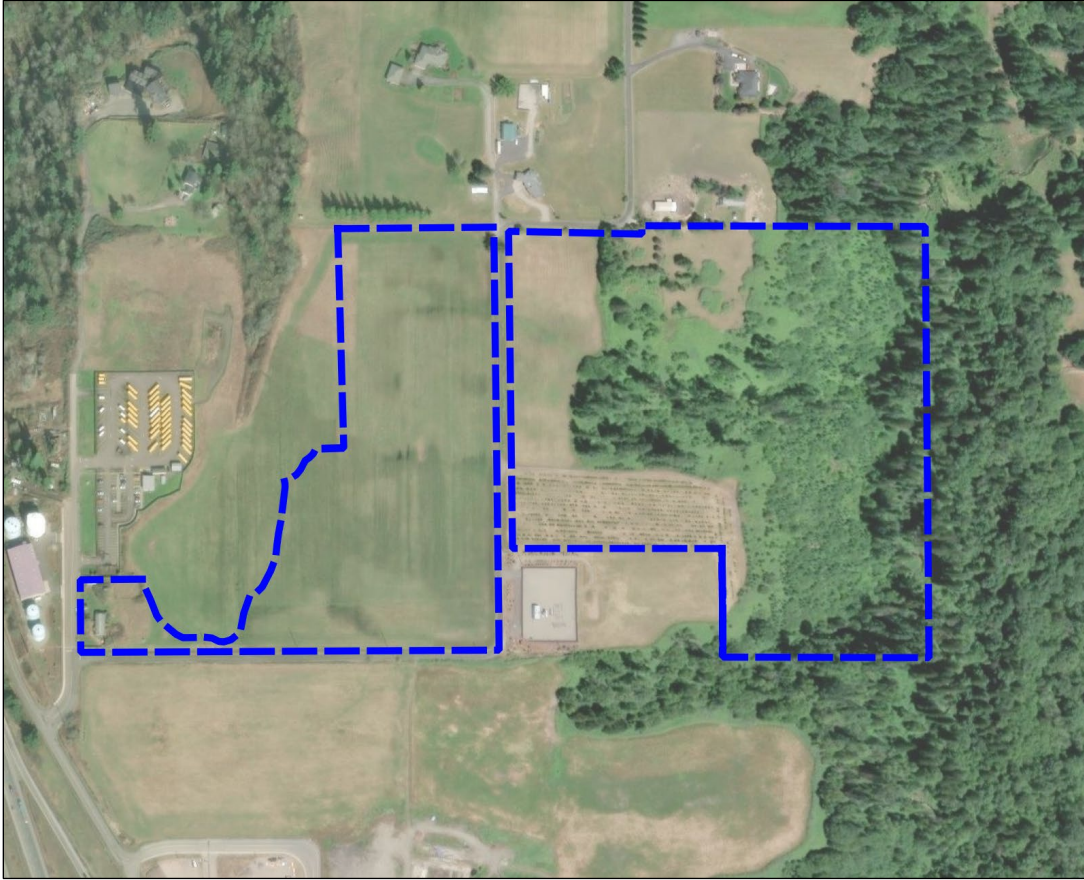
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## AGRICULTURAL RESOURCE LAND ANALYSIS FOR DETERMINATION OF DE-DESIGNATION IN CLARK COUNTY, WASHINGTON

PREPARED FOR  
MICHAEL DAWKINS, JOEL STIRLING, AND BARBARA HOLMES  
DECEMBER 2024

**JOHNSON ECONOMICS, LLC**

621 SW Alder St, Suite 506  
Portland, Oregon 97205



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## I. INTRODUCTION

JOHNSON ECONOMICS was retained by MICHAEL DAWKINS, JOEL STIRLING and BARBARA HOLMES 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 La Center urban growth boundary (UGB), and over 600 new homes have been planned or built within a mile of the property since 2018. Developed land close to the property is primarily residential or commercial, though immediately surrounding parcels are mostly agricultural.

Public facilities and services are generally available at the subject property. It is outside the City of La Center utility service areas, in the Rural/Resource sewer district and within the Clark Public Utility service area. Schools and emergency services are within four miles and the nearest hospital is about ten miles away.

The soils on the subject property are within a range of classifications and are suitable mainly for hay and pasture use. The site does not hold any consumptive water rights, which prevents the possibility of irrigation. The productivity of potential farm operations is below a profitable level.

The property is designated partially as agricultural land and partially as timber 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 just over \$1.5 million, much higher than the current taxable use, 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.

La Center is also trending towards more residential and commercial use and less agricultural use. From 2010 to 2022, the city’s population increased by almost 40%, and over 800 new residential units (650 single-family homes) were permitted. Furthermore, over 62,000 square feet of commercial and lodging space is in planning or under construction within a mile of the subject property, and over 1.3 million square feet of commercial and lodging space within one mile have been completed since 2019.

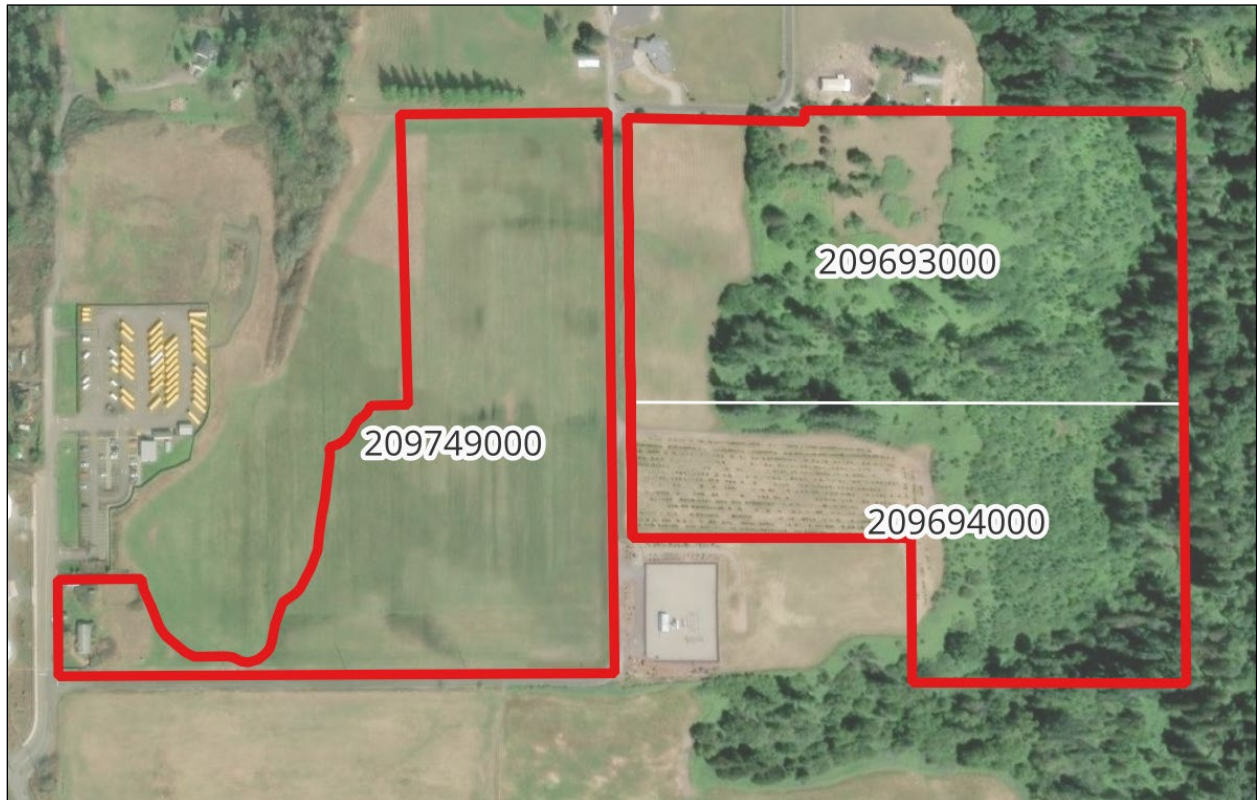
We find that the subject property does not meet the criteria of agricultural resource land as defined by the Washington Growth Management Act, and therefore, we recommend de-designation.



### III. SITE ANALYSIS

The subject property is comprised of three parcels that total 53.66 acres. The parcels are mapped with their ID numbers below. All parcels are zoned for agricultural use.

FIGURE 3.1: PARCELS CONTAINED IN THE SUBJECT PROPERTY



SOURCE: Clark County, JOHNSON ECONOMICS

#### PROPERTY BACKGROUND

The parcels that make up the subject property are owned separately. Parcel 209693000 (the northeast parcel) is zoned for agriculture and designated as Timber Land under Clark County's Current Use tax program. Parcel 209694000 (the southeast parcel) is zoned for agriculture and considered Designated Forest Land under Clark County's Current Use tax program. Parcel 209749000 (the west parcel) is also zoned for agriculture and designated as Farm & Agriculture Land under Current Use.

According to the current property owner, about nine acres of timber on the northeast parcel were harvested around 2014. This is confirmed by satellite imagery, which also shows the harvesting of five acres of timber on the southeast parcel. Otherwise, no commercial crops were grown on that parcel. In addition, the northeast parcel used to have a home and outbuildings, but these were burned down around 2012 by the fire department for training purposes. From satellite imagery, the west parcel appears to have been hayed during the 1990s and 2000s, and briefly used for grazing cattle around 2015.

The images below show the street view of the subject property from Northwest 324<sup>th</sup> Street and Northwest 26<sup>th</sup> Avenue. The first image is of the west parcel from the south, the second is of the northeast parcel from the west, and the last is of the southeast parcel from the west.



FIGURE 3.2: STREET VIEW OF SUBJECT PROPERTY, 2023



SOURCE: Google Earth, JOHNSON ECONOMICS



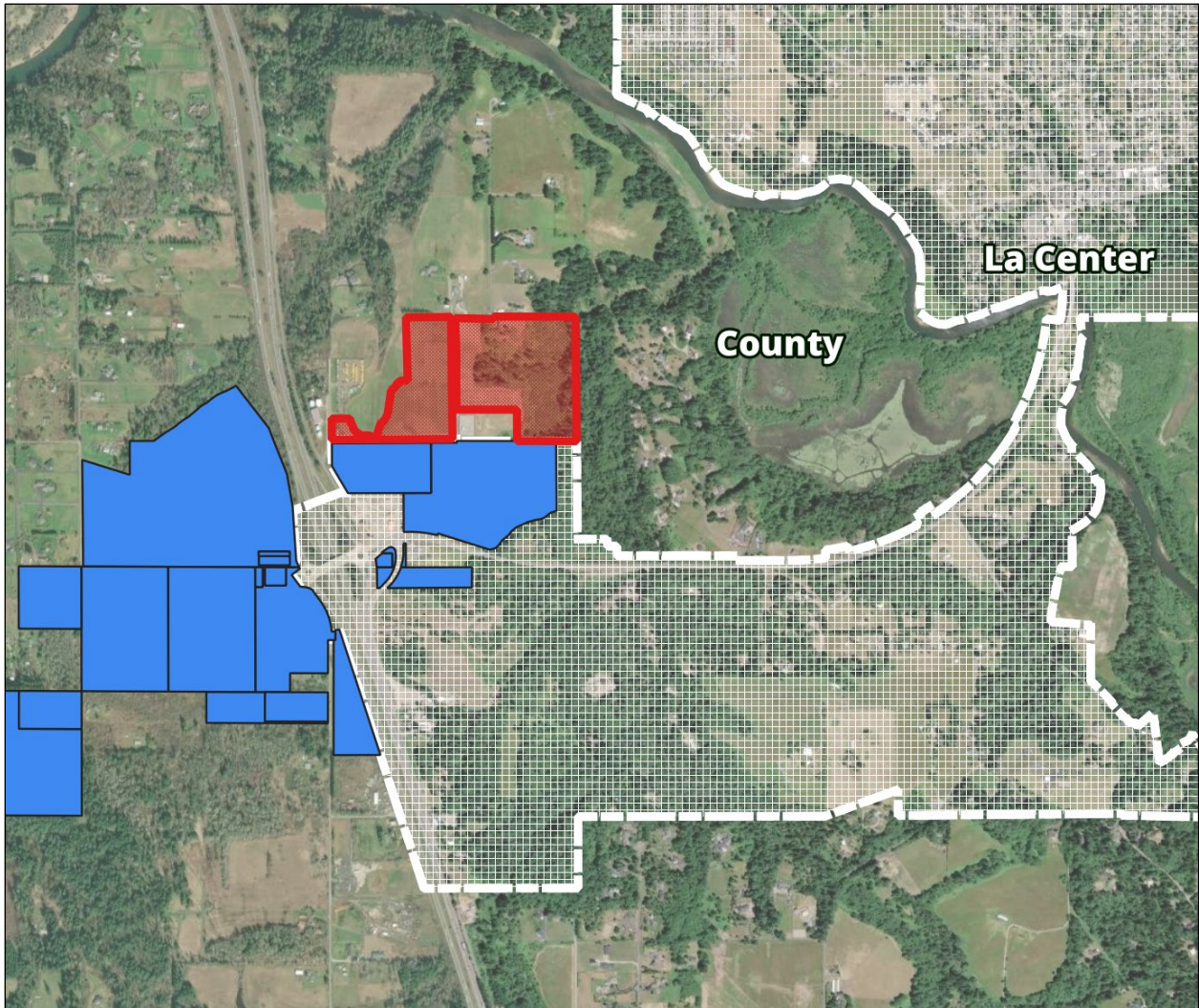
The parcels that are within the Current Use program have been included since the development of Clark County's comprehensive plan, adopted in the 1990s. Current Use allows open space, timber, agricultural, and forest lands to be taxed at the value of their current use, rather than at their assessed value. The 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 La Center Urban Growth Boundary to the south. The parcels on the inside edges of these boundaries are primarily residential or agricultural. These boundaries were last updated in 2022, according to Clark County's GIS system. To the southwest of the site is Cowlitz Tribe trust property that includes the Ilani Resort and Casino. The freeway interchange on I-5 was reconstructed to accommodate the increase in traffic. Parcels within the Cowlitz Tribe reservation and properties in trust for future inclusion in the reservation are blue on the map below.

FIGURE 4.1: LA CENTER URBAN GROWTH BOUNDARY, TRIBAL AND TRUST PROPERTY, 2022

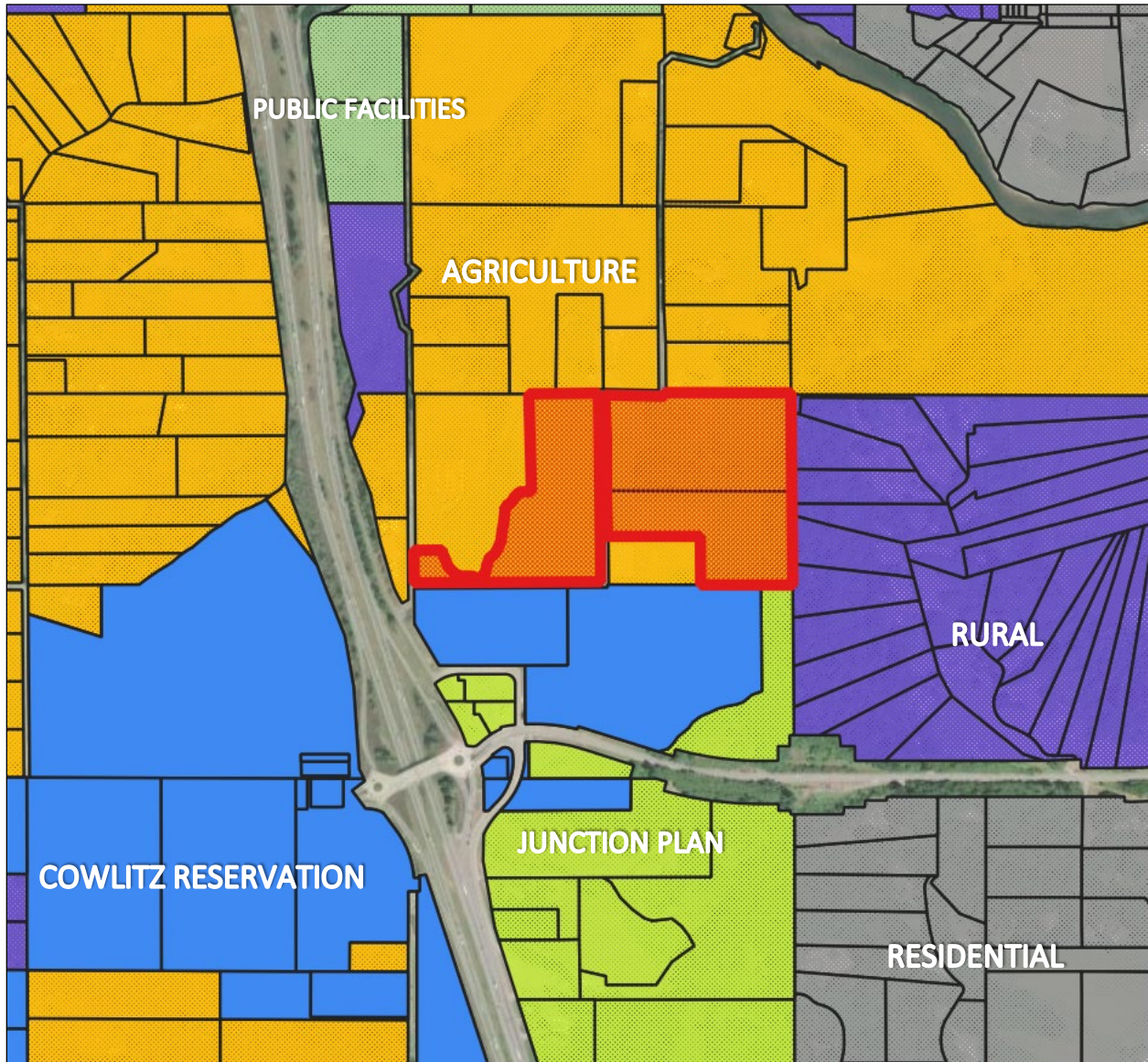


SOURCE: Clark County, JOHNSON ECONOMICS

The subject property is zoned for agricultural use. Agricultural zoning continues to the north and west of the property. To the southwest is the Cowlitz Tribe Reservation, which is expanding east towards the subject property and into the City of La Center. Most land to the east is rural and residential. There is a land area south of the subject property that falls under the La Center Junction Plan, which is intended to promote commercial, employment, and residential mixed-use development. The property is also zoned with an urban reserve and industrial overlay.



FIGURE 4.2: CLARK COUNTY/CITY OF LA CENTER ZONING, SUBJECT AND SURROUNDING PROPERTIES



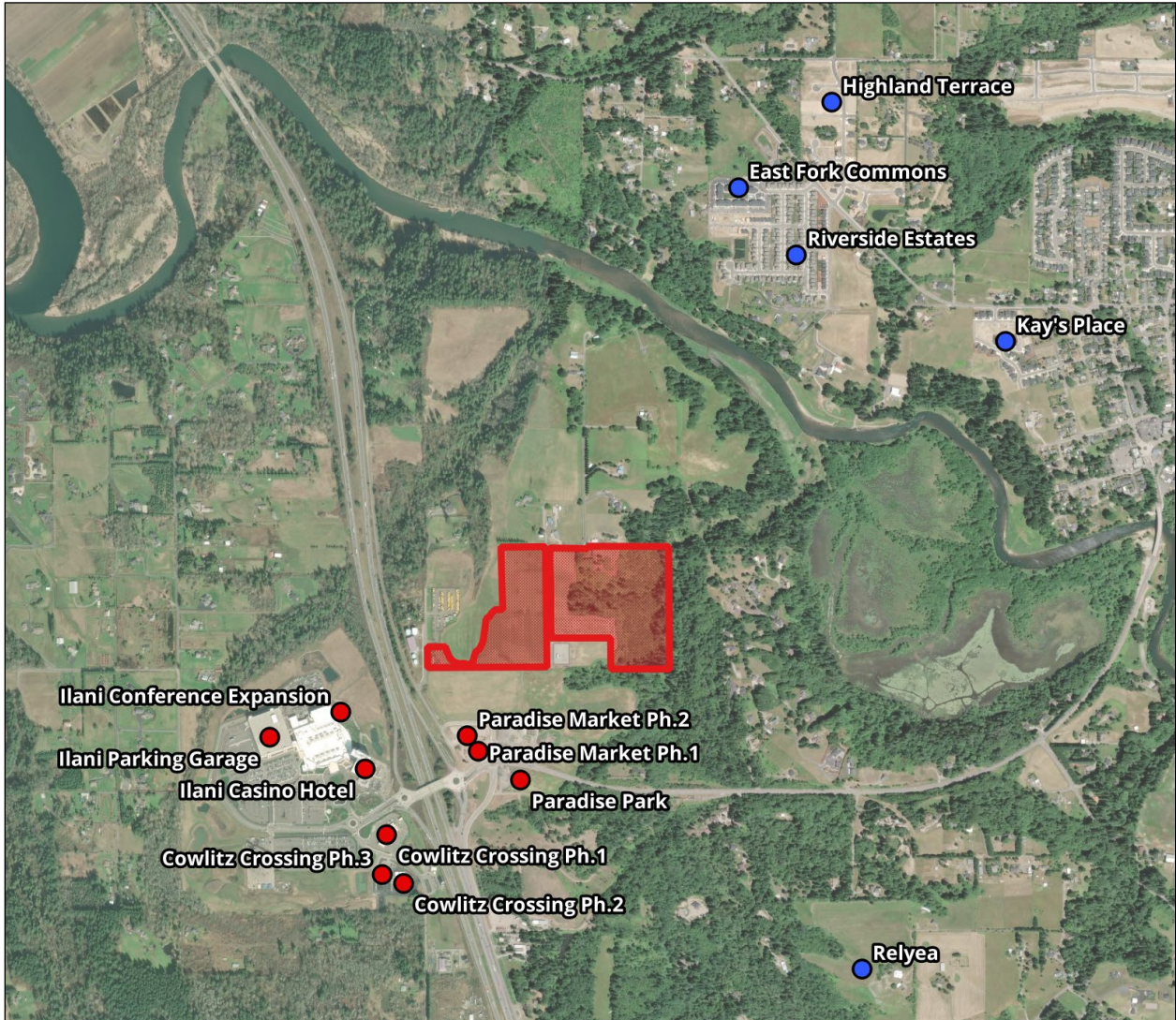
SOURCE: Clark County, JOHNSON ECONOMICS

Within a mile of the subject property, there are two subdivisions under construction and one in the planning process, as well as one recently completed. To the southeast is Relyea Subdivision, which has been proposed with 160 homes. Highland Terrace and Kay's Place, both of which are under construction in phases, will total 132 homes once completed. Riverside Estates and the multifamily project East Fork Commons have added 327 new homes/units since 2018.

There are also several commercial and lodging developments within the same radius, mostly clustered around the Interstate 5 interchange. Paradise Market, completed in 2019, includes a gas station and convenience store. From 2020 to 2023, the Ilani Casino added a parking garage, hotel, and conference expansion. Cowlitz Crossing, a small commercial center, is mostly complete, with one phase still under construction. These developments are mapped below: blue points are residential, and red points are commercial.



FIGURE 4.3: NEW DEVELOPMENTS IN PROXIMITY, 2024



SOURCE: Clark County, JOHNSON ECONOMICS



## V. CURRENT AGRICULTURAL PRODUCTION

The northeast parcel is not currently being farmed commercially. About four acres of grass are hayed every year by a local farmer, but this hay is not sold. The timber has not been farmed since 2014. The trees on the southeast parcel were also harvested around this time. The southeast parcel appears to have been hayed through 2018 on about 4 acres, after which trees were planted on that area. The west parcel had a small herd of cows in 2016, according to satellite imagery, but appears to only have been hayed since.

**FIGURE 5.1: STREET VIEW OF WEST PARCEL, 2023**



*SOURCE: Google Earth, JOHNSON ECONOMICS*

There is a small llama and alpaca farm just northwest of the subject property; this is the only commercial farm within a mile. Immediately to the south of the east parcel is designated forest land. There are several other Current Use-designated agricultural parcels in proximity that are no longer being farmed.



## 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, especially in the center of parcels 209749000 and 209694000 and on the west side of parcel 209693000, is Gee silt loam, up to 8 percent slopes (GeB). These areas are Class II soils, which are useable for most crops and pasture. There are also some areas of Gee silt loam soils at higher slopes (GeD, GeE, and GeF), which are Class IV and VII. These are generally not suitable for crops. There are also some small areas of Odne silty clay loam (OdB), which is Class VI, and Puyallup sandy loam (PuA), which is Class III. Finally, there is a small area on the southeast corner of the subject property that is Riverwash (Rc), which is Class VIII.

FIGURE 6.1: USDA SOIL CLASSIFICATION, 2024



SOURCE: USDA Web Soil Survey, JOHNSON ECONOMICS

### WATER RESOURCES

Two of the three parcels in the subject property—Parcel 209693000 and Parcel 209694000—do not have any water rights of record. The third parcel, Parcel 209749000, has one water right of record: water right certificate G2-



00721CWRI. This certificate authorizes group domestic use and stockwater use of groundwater on Parcel 209749000 under a priority date of October 27, 1971. Importantly, G2-00721CWRI does not authorize any irrigation use on the parcel. Given that none of the parcels in the subject property have an appurtenant water right for irrigation, the parcel owners would need to obtain one or more new water rights through an administrative process in order to irrigate the subject property for commercial agricultural purposes. Note that a significant portion of Parcels 209693000 and 209694000 are covered by vegetation and trees. Even if the parcel owners could obtain a water right, the owners would either be limited to a very small arable space for crop cultivation or they would be required to conduct removal of the vegetation.

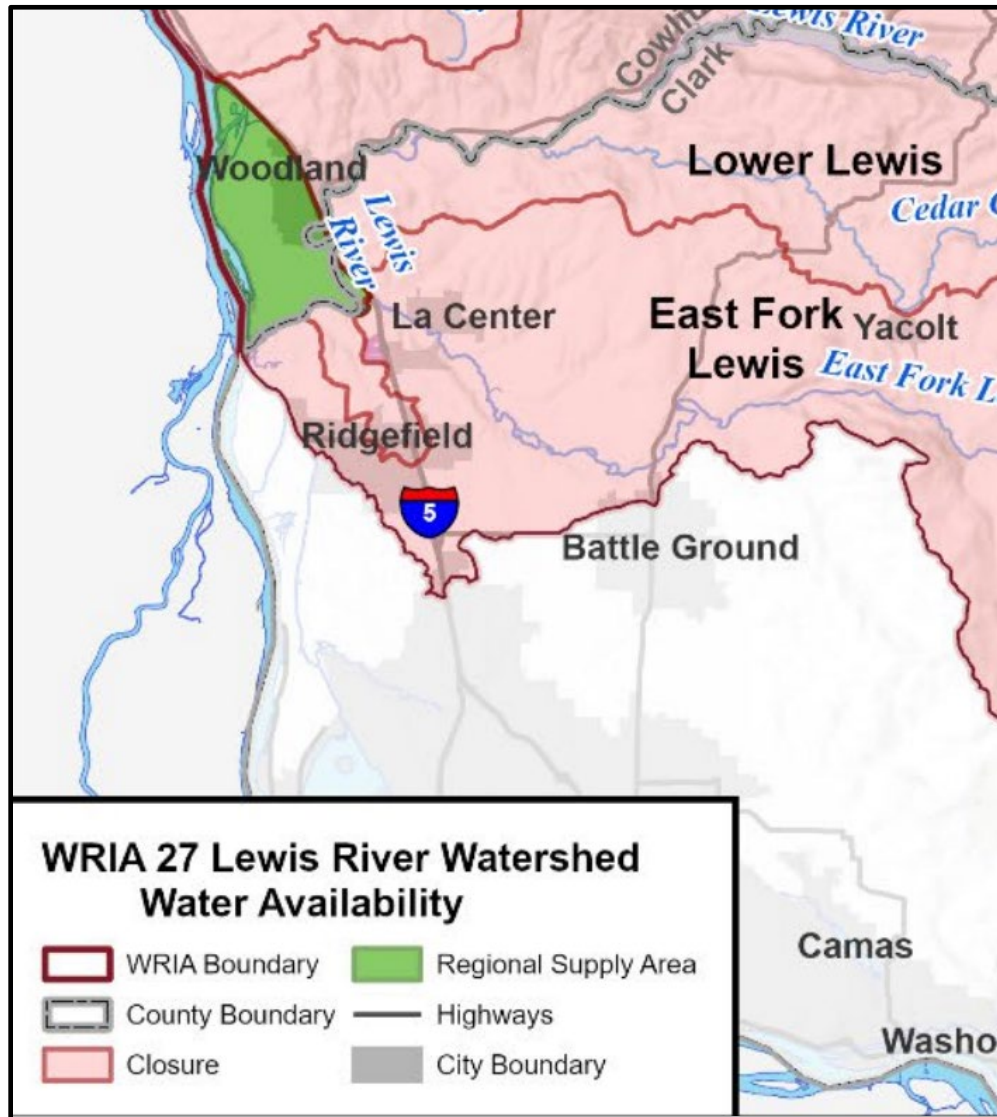
In Washington, there are two main processes to obtain a new irrigation water source. First, a property owner can apply for and be granted a new water right from the Department of Ecology (“Ecology”). Second, a property owner can transfer an existing water right onto their property for use. The following sections discuss the considerations for each of these processes based on the location of the subject property.

The subject property is located in Water Resource Inventory Area (“WRIA”) 27. Ecology has made clear that acquiring new water rights in most of WRIA 27 will be “a very difficult and expensive process.” See WRIA 27 Lewis Watershed Water Availability. WAC 173-527 establishes an instream flow right for WRIA 27 and outlines standards that Ecology must implement to protect this instream flow right from impairment by any new water rights or water right transfers in WRIA 27. WAC 173-527-060(3). WAC 173-527-070(1) establishes surface water closures in the WRIA, shown in Figure 1 below. Further, pursuant to WAC 172-527-070(2), Ecology has determined that based upon the basin hydrogeology, future groundwater withdrawals have a “high” likelihood of affecting the surface waters that are closed to new appropriations under WAC 173-528-070(1). As such, the basin is closed to new groundwater rights that would affect closed surface waters unless (1) an applicant can prove that closed surface waters will not be impaired or (2) the applicant prepares a mitigation plan. WA 173-527-080. Both of these processes require significant time and expertise to complete. Note that the subject property is not within a regional supply area for future groundwater withdrawals under WAC 173-527-090, and no water is reserved for irrigation use in the East Fork Lewis River Subbasin pursuant to WAC 173-527-110.

A prospective water right user in WRIA 27 may also transfer all or part of an existing irrigation water right certificate to a new property for irrigation use, provided the certificate is not subject to relinquishment. Such a transfer will still be subject to the WRIA 27 rules, and the transfer would not be approved if Ecology finds that it impairs instream flows. WAC 173-528-060. Importantly, a prospective transferred water right user will need to locate a water right that is not subject to relinquishment, will not impair streamflows as a result of the transfer, and is held by a holder that is willing to sell the water right. This process typically requires consultation with Ecology and consultants to identify a water right that fits the requirements. As a final note, it is impossible to predict the outcome of any of Ecology’s administrative process. As such, we cannot determine at this point whether the new water right application process or the transfer process will yield irrigation water for the subject property. The approximate location of the subject property is shown by the yellow circle. The areas of closure are shown in red.



FIGURE 6.2: LEWIS RIVER WATERSHED WATER AVAILABILITY, 2023



SOURCE: WA Department of Ecology

### AVAILABILITY OF PUBLIC FACILITIES

The major road closest to the subject property is Northwest La Center Road to the south, which connects to the nearby Interstate 5 interchange. This road has two travel lanes, each about 13 feet wide, before the roundabout at the highway interchange. These are separated by a double yellow line, and there are no bike lanes or sidewalks. The posted speed limit is 50 miles per hour, and the closest intersection, Northwest La Center Road and Northwest Paradise Park Rd, is controlled with stop signs on Northwest Paradise Park Rd. Immediately adjacent to the subject property are single-lane, dead end roads.

The subject property is currently under the jurisdiction of the Rural/Resource Sewer District, and about one mile west of the La Center Sewer District. Water is provided by Clark Public Utilities, as it is throughout the City of La Center.



### AVAILABILITY OF PUBLIC SERVICES

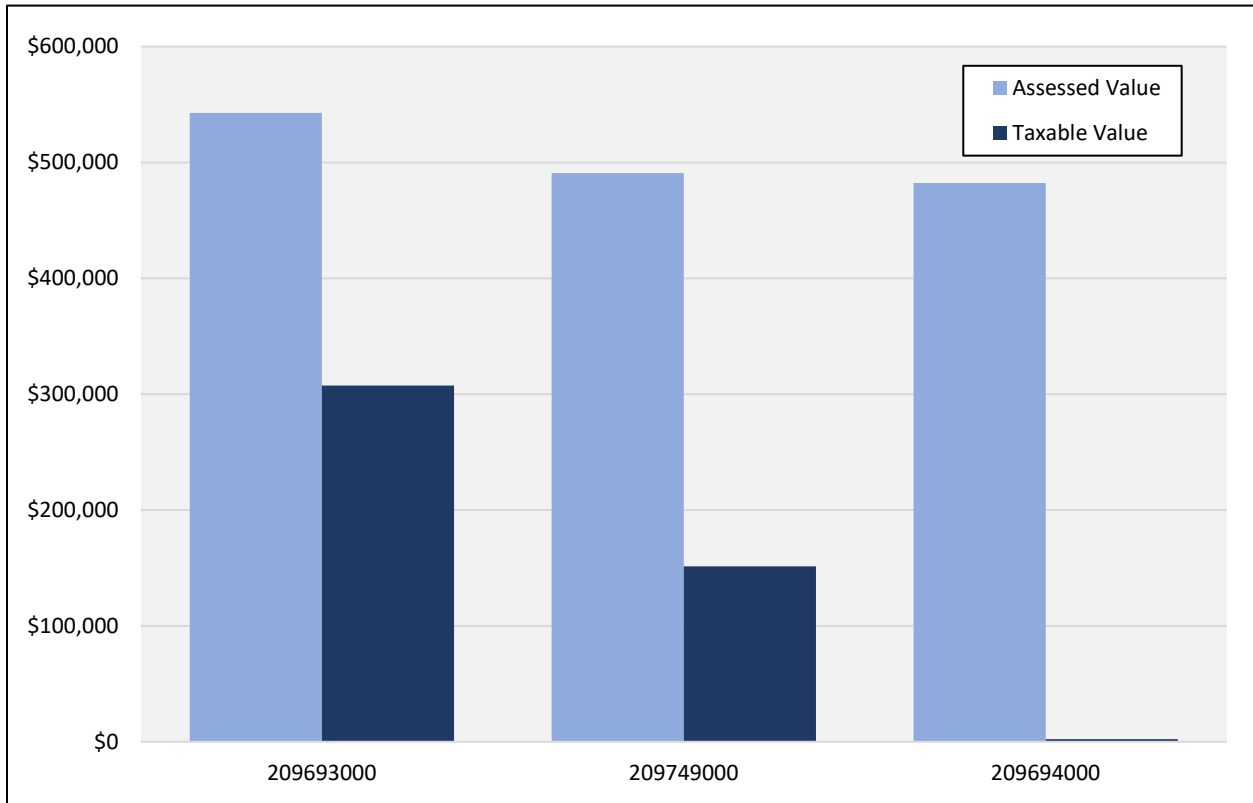
The subject property is about a mile and a half west of the Clark-Cowlitz Fire Rescue Station 23, within the City of La Center, and about the same distance from the La Center Police Department. The nearest medical center with an emergency department is Legacy Salmon Creek Medical Center, about ten miles to the south of the subject property. There is a primary and urgent care clinic about three miles to the southeast in Ridgefield, on Pioneer Street.

The subject property is in the Ridgefield School District, about 3.5 miles northeast of Union Ridge Elementary School. However, the district is set to begin construction on a new elementary school on a large lot almost three miles southeast of the subject property, if voters approve the construction cost. The property is just over four miles from Ridgefield High School and View Ridge Middle School.

### TAX STATUS

All three parcels are designated under the Current Use program, so they are taxed at a reduced value from their assessed market value. Parcel 209693000 is designated as timber land, Parcel 209694000 is designated as forest land, and Parcel 209749000 is designated as farm & agricultural land. The graph below illustrates the difference between assessed and taxable values under this program.

FIGURE 6.3: 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).

Additionally, the basic definition of timber land under Current Use is:

“any parcel or contiguous parcels of land five or more acres devoted primarily to the growing and harvesting of forest crops for commercial purposes. Timber land means the land only and does not include a residential home site. The term includes land used for incidental uses that are compatible with the growing and harvesting of timber but no more than ten percent of the land may be used for such incidental uses. It also includes the land on which appurtenances necessary for the production, preparation, or sale of the timber products exist in conjunction with land producing these products” (RCW Chapter 84.34 and 84.33).

Lastly, the basic definition of designated forest land under Current Use is:

“any parcel of land or contiguous parcels of land at least five acres that is primarily devoted to and used for growing and harvesting timber” (RCW Chapter 84.33).

While the timber parcel and the forest land parcel currently meet these requirements, if the parcels are sold for non-timber/forest 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 total around \$95,400.

## **PROXIMITY TO URBAN GROWTH AREAS**

The subject property is adjacent to the La Center Urban Growth Boundary. It is within one mile of three residential projects that are under construction or in the planning process, which will add almost 300 new homes once complete, as well as two recently completed subdivisions that have added 327 new homes since 2018.

Additionally, there are multiple commercial and lodging developments within a mile of the subject property, on the Cowlitz Tribe reservation. The tribe intends to continue commercial development on the land east and south of the Ilani Casino, some of which was recently incorporated from the City of La Center and placed into the tribal trust. This demonstrates proximity to urban growth areas.

## **PARCEL SIZE**

The parcels are similar in size at 15 to 20.23 acres. These are significantly larger than residential parcels in subdivisions around the site, which range from 0.08 to 0.17 acres. Commercial parcels to the west and south, including those on the Cowlitz reservation, range from 1-70 acres; parcels at the subject property fall within this range.

## **LAND USE PATTERNS & INTENSITY OF SURROUNDING LAND USE**

There is a small llama and alpaca farm just northwest of the subject property; this is the only commercial farm within a mile. Other land to the north and west is primarily rural and agricultural. To the south is the Cowlitz Tribe reservation, which contains the Ilani Casino and several small commercial buildings. Tribal land adjacent to the subject property on the south side is intended for future commercial development.

New residential and commercial development is taking place primarily to the east and south, inside the La Center UGA. Development is already moving towards the current UGA boundary and the subject property. Agricultural use of the subject property would stand in contrast to anticipated land use patterns of surrounding areas.



## HISTORY OF PERMITS ISSUED NEARBY

Since 2018, four subdivision permits have been issued within one mile of the subject property, and one project is in the planning process within the same radius. One subdivision has been completed: Riverside Estates, which has 183 units. Two subdivisions, totaling 132 units, are under construction (Highland Terrace and Kay's Place). Relyea Subdivision is pre-application, with 160 units proposed. In addition, an apartment complex, East Fork Commons, was permitted in 2020 and then completed in 2021, adding 144 homes. Nine commercial building permits have been issued since 2018, leading to over 1,330,000 completed square feet of commercial and lodging space. There are still 4,500 square feet under construction, and 58,000 SF in land use review. Permits issued nearby indicate strongly that the subject property is characterized by urban growth.

**FIGURE 6.4: RESIDENTIAL AND COMMERCIAL BUILDING PERMITS ISSUED SINCE 2017**

#	Project Name	Address	Type	Status	Permit Year	Units
1	Relyea Subdivision	31008-12 NW Spencer Rd	Single-Family	Pre-App	N/A	160
2	Highland Terrace	NW 18th St & NW 14th Ave	Single-Family	Under Constr.	2020	95
3	Kay's Place	W Golden Eagle Ave	Single-Family	Under Constr.	2018	37
4	East Fork Commons	1724 W 15th St	Multifamily	Complete	2020	144
5	Riverside Estates	NW 13th St & W 15th Ave	Single-Family	Complete	2018	183
<b>Total Residential Units</b>						<b>619</b>
#	Project Name	Address	Type	Status	Permit Year	SF
6	Paradise Market Ph 1	32022 NW Paradise Park Rd	Commercial	Complete	2019	4,500
7	Paradise Market Ph 2	32022 NW Paradise Park Rd	Commercial/lodging	Complete	2019	81,900
8	Ilani Casino Parking Garage	1 Cowlitz Way	Lodging	Complete	2020	978,000
9	Ilani Casino Hotel	1 Cowlitz Way	Lodging	Complete	2022	250,000
10	Ilani Conference Expansion	1 Cowlitz Way	Lodging	Complete	2023	14,300
11	Cowlitz Crossing Ph 1	31801 NW 31st Ave	Commercial	Complete	2019	5,500
12	Cowlitz Crossing Ph 2	31420 NW 31st Ave	Commercial	Complete	2022	5,000
13	Cowlitz Crossing Ph 3	31420 NW 31st Ave	Commercial	Under Constr.	2023	4,500
14	Paradise Park	NW Paradise Park Rd/La Center Rd	Commercial/lodging	Land Use Review	N/A	58,100
<b>Total SF</b>						<b>1,401,800</b>

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

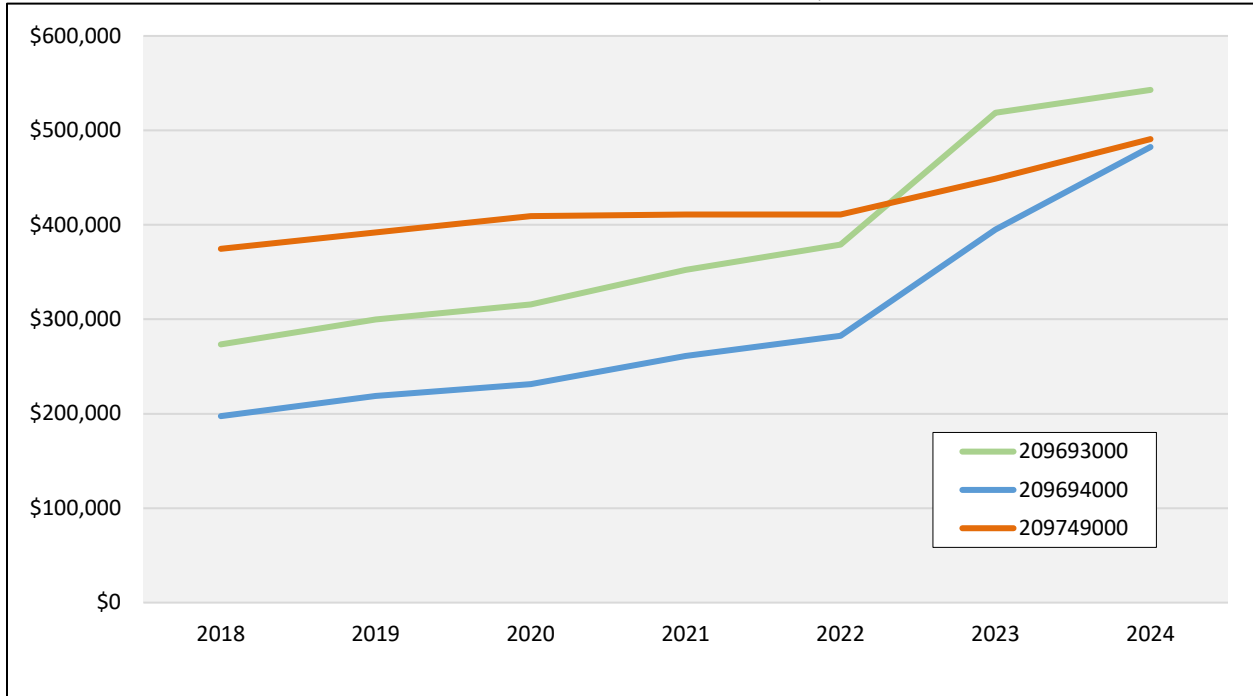
## LAND VALUES UNDER ALTERNATIVE USES

All three parcels are designated under Current Use, one as timber land, one as designated forest land, and the third as farm & agriculture land. These parcels have 2024 assessed values of \$482,000 to \$543,000, while their taxable values range from \$2,325 to \$307,000. The parcel assessed at \$491,000, with a taxable value of \$152,000, includes a building valued around \$92,000.

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 for each parcel. From 2018 to 2024, assessed values increased by 30-144%.



FIGURE 6.5: ASSESSED VALUE OF SUBJECT PARCELS, 2018-2024



SOURCE: Clark County Assessor, JOHNSON ECONOMICS

## PROXIMITY OF MARKETS

With hay or livestock production (more on this following), distance to markets can be variable. Hay is possible to sell 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 likely at the subject property. Commercial cattle slaughter facilities are farther and fewer in number as food safety regulations become stricter.

## AGRICULTURAL PRODUCTIVITY

Hay farming and livestock operations are also possible options for farming at the subject property, given land capability and water availability. Higher value crops such as vegetables and berries would require irrigation. 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. There are about 22.4 acres across both properties that appear useable for haying. This does not include the timber area, which would add about 15 acres, but would require quite a bit of preparation to be useable. If we assume exclusive hay production, selling all that is produced, maximum revenue is \$29,120 to \$34,944 yearly (\$48,620 to \$58,344 if we include the timber area). This figure only includes sales and does not consider any costs, which include labor, equipment, land preparation and fertilizer as well as transaction costs.

The second possible use of the subject property is pasture grazing. We use cow-calf pairs as an example. A single cow-calf pair needs about two acres for grazing, and a barn and equipment would also be needed. With the same assumptions as haying, up to 11 calf-cow pairs could be supported on the subject property (17 with the timber area). The operations analyzed in USDA budgets have 138 cows and an annual calf crop of 104, which is considered small



scale, but is more than twice as large as what is possible on the subject property. The USDA budget estimates the net value per calf sold at a loss of \$359, removing this as a profitable option. Additionally, with cattle production comes concerns for mud, odor, groundwater pollution, and nuisance conflicts with nearby residential and commercial areas.

Another possible use on parcels 209693000 and 209694000 would be to continue timber production. About 25 acres across both parcels are currently useable for this purpose. According to the Washington State Department of Natural Resources, the average value of timber in 2022 was \$583 per thousand board feet (a board foot describes a piece of lumber 12 inches wide, 12 inches long, and one inch thick). However, this value is unusable on its own – we would need to estimate the number of board feet per acre at the subject property, which would require counting and measuring individual trees. This is beyond the scope of this report. In addition, the most recent timber harvest was in 2014, and most trees require at least 20 years before the next harvest, so no sale would be possible for at least 10 years. Lastly, Clark County contains over 18,000 acres of Current Use-dedicated timber land. The subject property is quite small in area at 25 acres. It is reasonable to assume that alone, these parcels would not be commercially significant for timber use.

The most significant cost associated with agricultural use of the subject properties, however, is the cost of buying or renting the land. The assessed market value of the subject property is just over \$1.5 million. While there are no comparable farm sales in the area, it is very unlikely that a farmer would pay that much for a small-scale farming operation.



## 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 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.

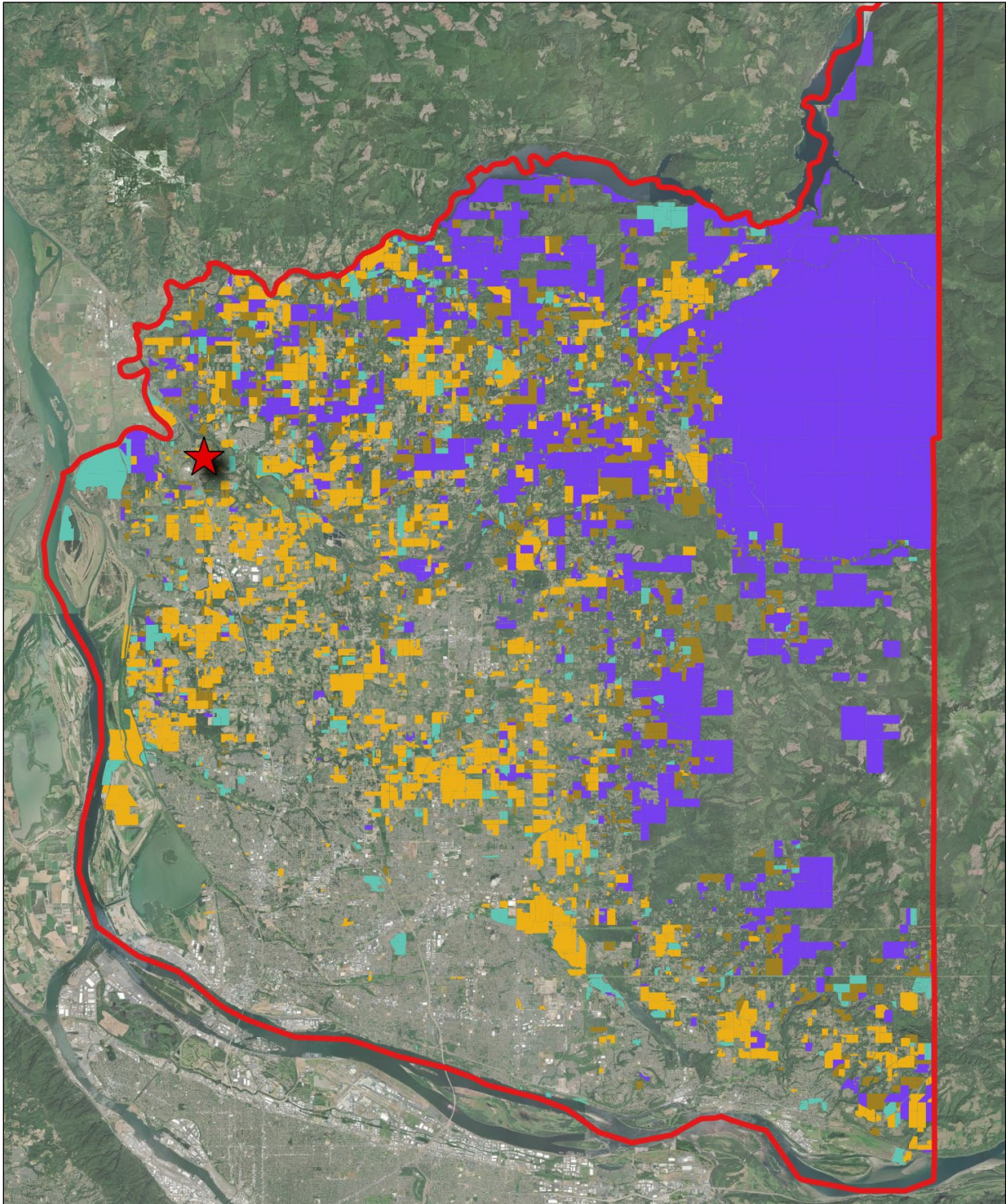
As of 2022, there were just over 1,900 farms in Clark County, according to the USDA. This includes 56,000 total acres, down 38% from 2017, when there were over 90,000 acres of land in farms. However, the number of farms in the county only decreased by 3%, suggesting that either a few large farms have 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), 13% is timber land (brown), and 55% is designated forest land (purple). The rest is open space (teal), which is not relevant to this analysis. The subject property includes about 0.05% of the total Current Use designated agricultural land area, 0.1% of the total Current Use designated timber land area, and less than 0.01% of the total designated forest land in Clark County.



FIGURE 7.1: CLARK COUNTY LAND UNDER CURRENT USE, 2024



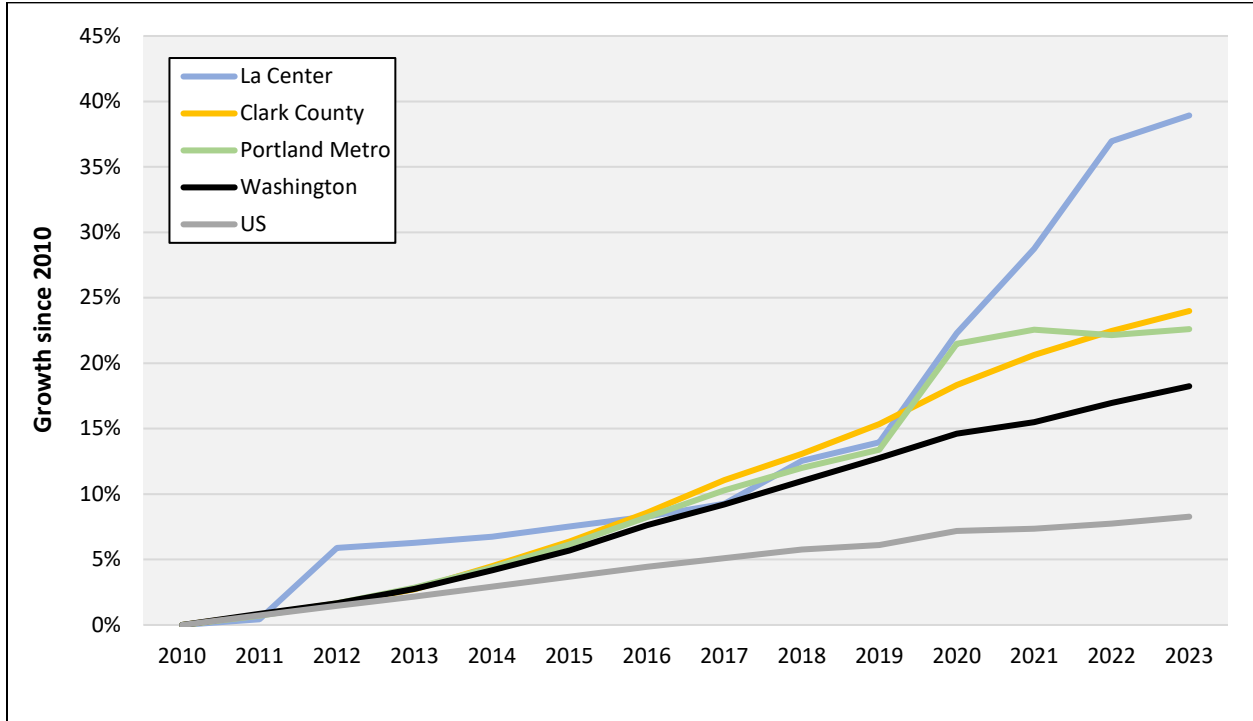
SOURCE: Clark County, JOHNSON ECONOMICS



## 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, La Center saw a 39% increase in population, just over 1,000 people. Much of this—almost 700—was just since 2019.

FIGURE 7.2: POPULATION GROWTH SINCE 2010, GEOGRAPHIC COMPARISON



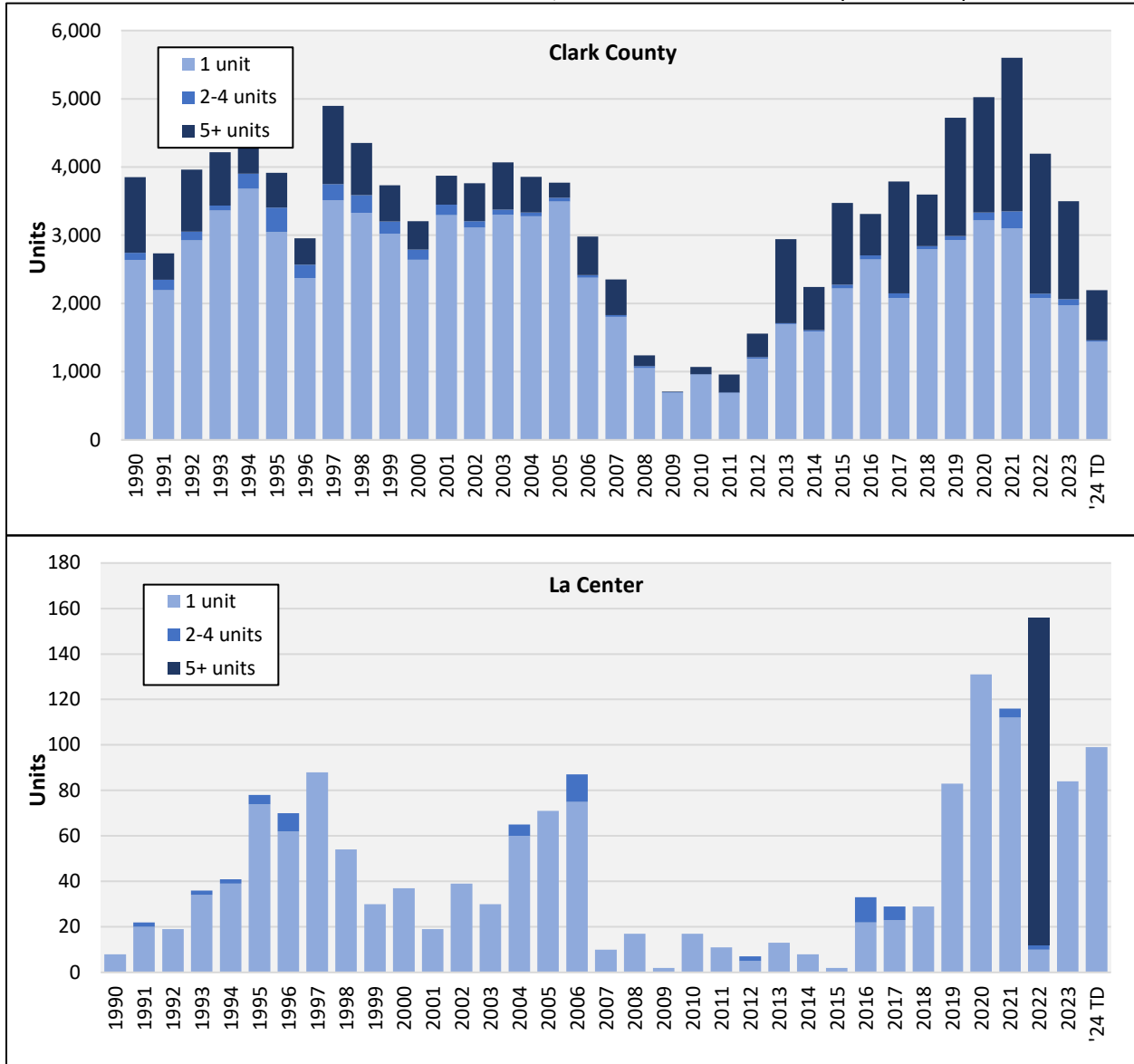
SOURCE: U.S. Census Bureau, Portland State University, WA Office of Financial Management, JOHNSON ECONOMICS

The increasing population in the county indicates a need for more housing, especially in fast-growing areas such as La Center and 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 La Center, which saw consistent development through the mid-2000s. Residential development then dropped very low through 2018. Then, units permitted almost tripled the next year and have since stayed high. New homes in La Center are mostly single-family, though one large apartment project was completed in 2018.



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



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

As La Center continues to develop, and as the city’s population continues to grow at rates above Portland’s and the broader metro area’s, 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 La Center UGB and in proximity to multiple new subdivisions and commercial sites. The La Center/Ridgefield area is fast-growing, characterized by a lack of residential and commercial land; La Center's population has grown by almost 40% since 2010 and Ridgefield has grown even faster. 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.
- While a part of the subject property is current in agricultural use, meeting the second GMA requirement of "the land is used or capable of being used for agricultural production," most of the property is no longer being farmed commercially. Several agricultural parcels around the subject site have also 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 development values and are much higher than what a farmer would reasonably pay to use the land for farming. The potential profit from producing hay or grazing cattle is low or negative and timber profit will not be possible for at least ten years.