From:	Jeffrey Delapena
To:	"Olivia Zimmerly"
Cc:	Sue Marshall; Matt Little; Glen Yung; Michelle Belkot; Wil Fuentes; Rebecca Messinger; Oliver Orjiako; Jose Alvarez
Subject:	RE: FEIS Comment Letter 9.24.26 - 2025 Comp Plan Update
Date:	Thursday, September 24, 2026 1:45:00 PM
Attachments:	FEIS Comment Letter 9.24.26 .pdf

Good day, Olivia,

Thank you very much for submitting comments related to the FEIS ahead of the Oct 1st Public Hearing.

I am including additional members of Staff. These comments will be added to the Comprehensive Plan Index of Record.

Best,

Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558

NOTICE OF PUBLIC DISCLOSURE: This e-mail account is public domain. Any correspondence from or to this e-mail account may be a public record. Accordingly, this email, in whole or in part may be subject to disclosure pursuant to RCW 42.56, regardless of any claim of confidentiality or privilege asserted by an external party.

-----Original Message-----
From: Olivia Zimmerly <zimmerlyolivia@icloud.com>
Sent: Thursday, September 24, 2026 1:39 PM
To: Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Cc: Sue Marshall <Sue.Marshall@clark.wa.gov>; Matt Little <Matt.Little@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>; Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>
Subject: FEIS Comment Letter 9.24.26 - 2025 Comp Plan Update

EXTERNAL: This email originated from outside of Clark County. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Jeff,

Please provide my attached FEIS comment letter to the County Council and to the Comprehensive Plan Record in advance of next week's hearing on October 1st.

Thank you,

Olivia Zimmerly

September 2026

Via Email

Subject: Clark County 2025 Comprehensive Plan Update – Final EIS Comments

Chair Marshall and Councilors:

Thank you for the extensive work reflected in the Final Environmental Impact Statement (FEIS) and for selecting the Preferred Alternative. The FEIS's transportation analysis strongly supports that choice. Before final adoption, however, several factual statements, acreage descriptions, and internal inconsistencies should be corrected so the final record accurately distinguishes gross zoning acreage from land that can actually be developed, and accurately describes the North Ridgefield Expansion Area.

These requested corrections do not undercut the Preferred Alternative. They will make the FEIS more accurate, internally consistent, and useful during implementation.

Gross UGA acreage is not the same as land converted to development

Page 82 states that the Preferred Alternative would convert approximately 800 acres to urban uses. Elsewhere, the FEIS identifies approximately 777 gross acres being added to UGAs (pp. 3-4 and 59). Both formulations blur an important distinction: changing a UGA boundary or zoning designation is not the same as physically converting every gross acre to development.

The FEIS's own environmental tables confirm that substantial portions of the expansion areas contain land that is constrained or protected. Table 36 identifies 93 acres of mapped wetlands within the expanded UGAs, including 28 acres in Ridgefield (p. 60). Table 47 identifies 248 acres of additional riparian priority habitat within the expanded UGAs, including 75 acres in Ridgefield (p. 73). These categories may overlap and should not be added together, but they demonstrate why gross UGA acreage cannot be treated as net developable acreage.

Within the approximately 200-acre North Ridgefield Expansion Area, approximately 50 acres are identified for habitat, wetlands, creek corridors, and related protected open space rather than urban development. The FEIS should therefore revise the statement on page 82 and the parallel descriptions on pages 117 and 119 to state that the Preferred Alternative adds approximately 777 gross acres to UGAs, portions of which contain protected critical areas, habitat, and buffers that cannot or will not be converted to urban development. Where the FEIS discusses physical conversion or environmental loss, it should identify net developable acreage rather than gross boundary acreage.

The same distinction is needed on page 119. Table 70 reports 509 acres of Agriculture-designated land transferred to UGAs, and the narrative then characterizes that figure as a 1.48 percent loss of existing designated agricultural lands. That is a zoning-acreage calculation, not a finding that all 509 acres are viable farmable land or will be physically developed. The very next paragraph acknowledges that actual impacts depend on viable farmable acreage, current use, irrigation water, and other site-specific conditions. The text should be revised to distinguish gross de-designated acreage from the actual loss of productive agricultural land.

For North Ridgefield, the FEIS and supporting adoption findings should expressly evaluate all three factors under WAC 365-190-050(3): whether the land is already characterized by urban growth under subsection (a), agricultural capability under subsection (b), and long-term commercial significance under

subsection (c). That evaluation should address the Johnson Economics study already in the record, surrounding development, and landowner evidence concerning soils, drainage, crop history, operating costs, chemical inputs and market demand. The County should explain how it weighed this evidence and identify the factual basis for retaining or changing the agricultural designation.

The October 2024 Johnson Economics study, reproduced in FEIS Comment 2 (pp. 252–253), describes North Ridgefield residential parcels, a former tree farm, unsuccessful strawberry cultivation and periodic cattle grazing, contracted hay production, and wooded or grassy parcels. The FEIS should address this history and distinguish acreage currently in agricultural production from acreage devoted to other uses or not actively cultivated. On portions used for hay production, landowners report substantial chemical inputs needed to control weeds and limited yields. The local arrangement is essentially an exchange: the operator keeps the hay as compensation for cutting and baling, while the landowner receives field maintenance.

For both the North Ridgefield and La Center expansion areas, the FEIS should document actual and historical uses and identify the records supporting any permit or tax-status conclusions. This should include identifying and describing any horse facilities, nurseries, commercial truck parking, stockpile yards and landscape businesses operating within these AG-zoned areas, together with the acreage they occupy. Council and the public should have a clear account of the uses actually occurring pursuant to the many allowed uses on the land and how those uses affect the agricultural baseline. An agricultural zoning designation alone does not establish that every acre is productive farmland or that its inclusion in a UGA would displace an operating commercial farm.

Urban growth and surrounding development. Subsection (3)(a) calls for evaluating whether the land is already characterized by urban growth using WAC 365-196-310. Under RCW 36.70A.030(49), that concept includes land whose relationship to an area with urban growth makes it appropriate for urban growth; existing urban development on every parcel is not required. WAC 365-196-310(1)(c) also permits a UGA to include territory outside a city that is already characterized by urban growth or is adjacent to territory already characterized by urban growth.

North Ridgefield should be evaluated in that actual setting. I-5 forms its eastern boundary, with Ridgefield city limits immediately across the freeway and extending farther east. The City also adjoins the area to the south, including the Costco/In-N-Out commercial district, and to the west, including Paradise Pointe. Since the last comprehensive plan update, nearby development has intensified, including the Cowlitz Indian Tribe's Ilani casino resort to the north and its 14-story hotel, opened April 24, 2023. These surrounding uses support the City's proposed expansion and warrant express findings on North Ridgefield's urban character, its relationship to adjoining urban territory, and the effect of nearby development on long-term agricultural viability. The County should address these facts under subsection (3)(a) and the applicable commercial-significance criteria, alongside the separate findings required for resource land de-designation and UGA inclusion.

Agricultural capability. Subsection (3)(b)(i) requires evaluation of current and potential agricultural use; an owner's intent is not controlling. Subsection (3)(b)(ii) requires use of the NRCS land-capability classification system. The record should reconcile those classifications with the County's hydric-soil mapping and the soil, drainage and production evidence for North Ridgefield. It should identify the acreage and types of agriculture the land can realistically support, including uses less dependent on soil quality, and explain how documented site conditions affect that assessment.

Long-term commercial significance. Subsection (3)(c)(i)–(xi) identifies eleven nonexclusive criteria for consideration, as applicable: farmland soil classifications; public facilities and agricultural transport; tax status and development-rights programs; public services; proximity to UGAs; parcel size and contiguity; settlement patterns and compatibility with agriculture; intensity of nearby uses; nearby development-permit history; land values under alternative uses; and proximity to markets. The County should address each applicable criterion with evidence and explain any criterion considered inapplicable.

For North Ridgefield, that commercial assessment should evaluate the Johnson Economics study, documented surrounding development and infrastructure, and reported hay yields, production costs, chemical inputs and market conditions. The ability to harvest hay does not itself resolve long-term commercial significance. The reported hay-for-maintenance arrangement warrants analysis of who bears production costs and what economic return the land can sustain. These findings should be incorporated into the countywide analysis required by subsection (1) and explain how North Ridgefield affects the long-term viability of the County's agricultural industry under subsection (5).

The Johnson Economics study should be evaluated on its evidence and methodology. In City of Arlington v. Central Puget Sound Growth Management Hearings Board, 164 Wn.2d 768 (2008), the Washington Supreme Court rejected the Board's dismissal of a landowner-commissioned analysis addressing the agricultural designation criteria and supporting the County's de-designation decision. Council should expressly weigh the Johnson Economics analysis against the County study and other material evidence, explain its conclusions, and incorporate the evidence it relies on into its adoption findings.

The Ridgefield acreage, zoning, parks, and housing descriptions should be reconciled

The FEIS uses materially different figures for the Ridgefield expansion without explaining the difference. Table 3 identifies a 240-acre increase (p. 3), Table 67 shows a 237-acre total change (p. 115), and the Ridgefield narrative describes an approximately 220-acre expansion (p. 117). Staff should reconcile these figures and explain whether they represent different subareas, data sets, or rounding conventions.

The zoning description is also inconsistent. Page 117 says the northward expansion would be zoned for industrial uses. Page 119 says the Ridgefield agricultural lands would be rezoned Employment - Mixed Use, 3-way Split (E-MU-3), while page 83 uses yet another formulation. E-MU-3 is a highly flexible three-way mixed-use designation that can accommodate employment, commercial, and residential uses. It should not be reduced to or described simply as industrial zoning. The Ridgefield descriptions should consistently identify E-MU-3 and accurately explain the breadth and flexibility of that designation. The description should distinguish intended City zoning following annexation from current County designations.

Page 117 also states that Ridgefield would have nearly double the capacity needed to meet its housing target. Table 68 reports a target of 5,815 units and capacity of 7,194 units. That is a surplus of 1,379 units, or approximately 24 percent above the target, not nearly double. The August 12, 2026 FEIS addendum revises the Table 2 target to 5,814. The tables and narrative should use consistent figures; either target leaves capacity approximately 24 percent above the target, not nearly double.

The County's earlier draft capacity table, posted as updated April 27, 2026, reports Ridgefield's Alternative 1 housing capacity as 5,821 units against a 5,815-unit target, a surplus of only six units. It reports employment capacity of 7,993 jobs against an 8,175-job target, a deficit of 182 jobs. Its adjusted Alternative 2/Planning Commission housing figure of 7,144 units also differs from the July FEIS figure of 7,194. The FEIS should reconcile these earlier and later figures, explain the alternatives and assumptions

behind each, and identify the current analysis supporting its conclusions. A residential capacity surplus alone does not answer the separate question of employment capacity.

Ridgefield has already considered changes within its existing UGA as part of developing its preferred growth strategy. The City's December 18, 2025 correspondence documents its work to adjust mixed-use areas within existing boundaries to reconcile housing and employment capacity while retaining a modified Alternative 2. The FEIS should address that work and explain how the County's capacity conclusions account for the City's chosen balance of housing, employment and infrastructure.

The City's August 2026 Development Summary reports 181 new-home permits and 23 commercial/industrial permits for the year through August, together with numerous projects under review and construction. This ongoing development makes the timing and availability of remaining land central to the analysis. Capacity figures should be reconciled with development since the model's baseline and should account for properties whose owners do not intend to annex or develop, redevelopment feasibility, infrastructure availability and the housing types and employment sites actually needed. State planning guidance expressly recognizes that owner preferences, costs and other local conditions affect how much developable land will become available during the planning period. WAC 365-196-310(5)(d)(ii)(F).

North Ridgefield should therefore be evaluated as a coordinated part of the City's 20-year growth strategy: accommodating housing and employment together, adjoining existing urban development and infrastructure, and responding to the broader development pattern between Ridgefield and the Ilani casino area. Those considerations support retaining the expansion. Any conclusion that equivalent capacity is available elsewhere should identify the realistically available land, service capacity and development assumptions supporting that conclusion. Capacity attributable to North Ridgefield's inclusion cannot itself establish that the same capacity exists without the expansion.

The North Ridgefield proposal also includes approximately 1,000 homes intended for households at 80% of area median income (AMI), alongside employment uses. A total capacity surplus does not establish that equivalent affordable housing will be delivered elsewhere. The FEIS should distinguish modeled capacity from likely development, identify its annexation and development assumptions, and evaluate capacity by housing type and income level. It should not imply that every potentially available parcel will annex and develop during the planning period.

Finally, Table 4 reports Ridgefield parks and recreational facilities increasing from 80 acres under Alternative 1 to 109 acres under the Preferred Alternative (p. 7), while the response to FEIS Comment 324 states that the earlier Alternative 2 included no additional parks and open-space zoning in the Ridgefield UGA (p. 475). Those statements should be reconciled, including any difference between the alternatives, datasets or definitions. The FEIS should also distinguish formal parks zoning from habitat, wetlands, creek corridors, and other protected open-space acreage within the North Ridgefield area.

The transportation analysis strongly supports retaining the Preferred Alternative

Table 74 and the accompanying narrative confirm that the Preferred Alternative performs better on the most important systemwide travel measures (pp. 132 and 137-138). Compared with Alternative 1, the Preferred Alternative produces 21,562 fewer weekday person trips, 3,024 fewer daily bridge crossings, lower per-capita VMT, 11,028 fewer PM peak-hour vehicle-miles traveled, lower vehicle-hours traveled, and approximately 43 fewer PM peak-hour vehicle-hours of delay. Page 137 characterizes the reduction in total PM peak-hour delay as approximately five percent.

The FEIS expressly concludes that Alternative 1 would serve more vehicles taking longer trips and experiencing greater congestion (p. 137), while the Preferred Alternative would result in fewer trips, lower VMT and VHT, less delay, and approximately 3,000 fewer daily Columbia River bridge crossings (p. 138). Although the Preferred Alternative has more lane-miles at or above a 0.90 volume-to-capacity ratio, the FEIS explains that congestion is distributed across more of the network while total delay is lower. The full set of systemwide performance measures, rather than one isolated metric, demonstrates the Preferred Alternative's superior transportation performance and better balance between housing and employment.

These results support retaining the Preferred Alternative and the North Ridgefield Expansion Area. Directing growth to land already planned for urban transition, adjacent to I-5 and existing Ridgefield development and infrastructure, is consistent with the FEIS's emphasis on a better balance between housing and employment. The reported travel benefits are systemwide comparisons; they should not be attributed solely to North Ridgefield.

Documented transportation planning should also be accurately reflected. The City's adopted Transportation Capital Facilities Plan identifies the northern I-5 crossing as Project 15, with alternative alignments, and expressly connects that crossing to North Industrial Area planning on page 57. These are formal planning records, although alignment selection and construction funding remain unresolved. The FEIS should identify which planned improvements its model assumes and distinguish planning commitments from funded construction.

Table 74 contains technical items that should be verified before adoption

The source line for Table 74 and footnotes 68 and 69 on the following page contain an unresolved editorial marker, [JK1.1] (pp. 132-133). Those markers should be removed and the source citation completed.

The units or time-period label for vehicle-hours traveled should also be verified. Table 74 labels the reported values as PM peak-hour vehicle-hours traveled, but the vehicle-hours figures exceed the corresponding PM peak-hour vehicle-miles figures. If both are totals for the same peak-hour period and use the stated units, the resulting implied average speed would be less than one mile per hour. Table 4 uses the same vehicle-hours figures without the PM peak-hour label (p. 7). This suggests the label, units, or values are inconsistent and should be corrected. The relative comparison still favors the Preferred Alternative, but the final FEIS should present the measure accurately.

Requested Council action

Before final adoption, please direct staff to correct the gross-versus-net acreage descriptions; address the site-specific agricultural evidence and actual and historical land uses; make evidence-supported findings addressing urban-growth character, agricultural capability and each applicable long-term commercial-significance criterion under WAC 365-190-050(3)(a)–(c) within the required countywide analysis, including North Ridgefield's relationship to adjoining urban development under WAC 365-196-310(1)(c); reconcile the Ridgefield acreage, E-MU-3 zoning, parks/open-space, and housing and employment capacity statements; and correct the Table 74 source markers and units. The corrected FEIS should continue to reflect the transportation evidence supporting the Preferred Alternative and retain the North Ridgefield Expansion Area.

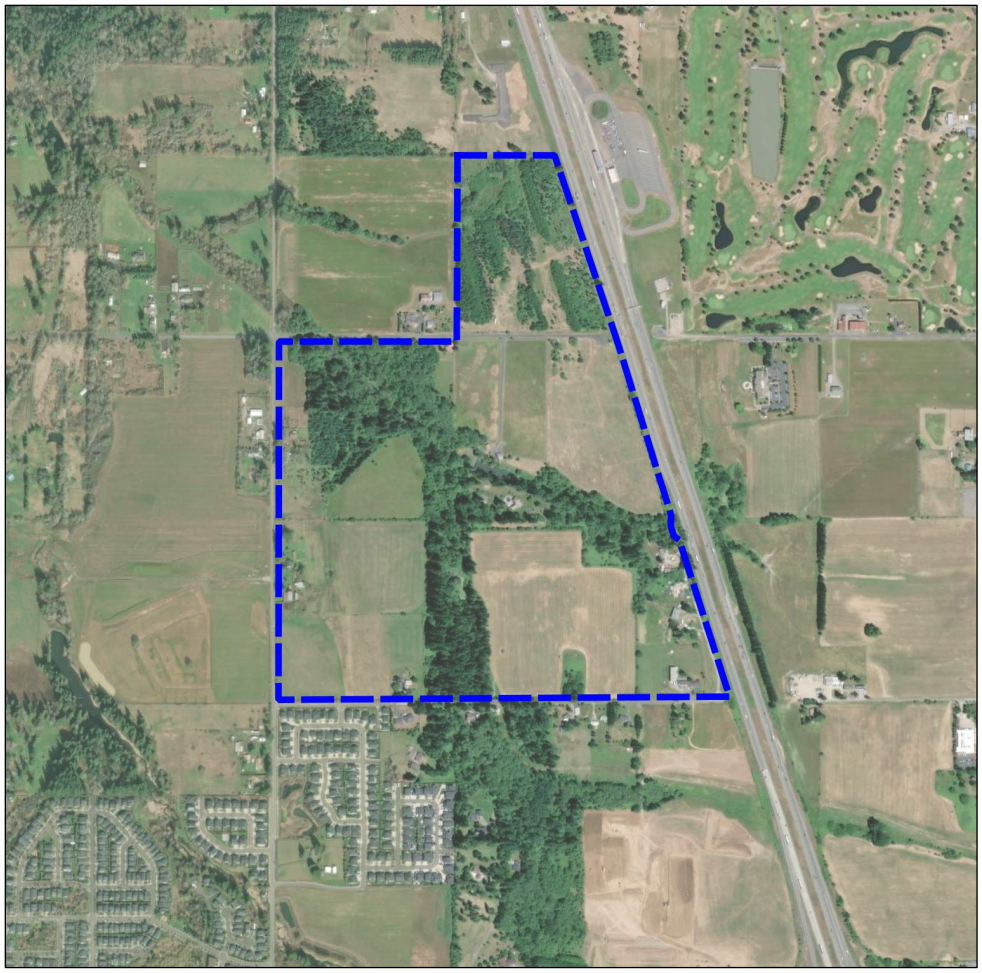
To support final adoption, Council should identify the studies, maps and testimony it relies on, address material contrary evidence, and explain why North Ridgefield no longer meets the agricultural resource-land designation criteria within the required countywide analysis. Separately, under WAC 365-196-310, the record should demonstrate the expansion's size and need, explain why reasonable measures and alternatives within the existing UGA do not meet the documented 20-year housing and employment needs, and identify urban-service capacity and a feasible funding plan. Please include this letter and its cited materials in the adoption record.

Thank you for your consideration.

Respectfully submitted,

Olivia Zimmerly
Z2O, LLC
Founder & Principal

JOHNSON
ECONOMICS



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

PREPARED FOR
NORTH RIDGEFIELD EXPANSION AREA PROPERTY OWNERS
OCTOBER 2024

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

JOHNSON ECONOMICS

TABLE OF CONTENTS

I. INTRODUCTION 1
II. EXECUTIVE SUMMARY 1
III. SITE ANALYSIS 2
PROPERTY BACKGROUND 3
IV. CHARACTERIZATION OF URBAN GROWTH 7
V. CURRENT AGRICULTURAL PRODUCTION 11
VI. COMMERCIAL SIGNIFICANCE FOR AGRICULTURE 12
LAND CAPABILITY CLASSIFICATION 12
WATER RESOURCES 13
AVAILABILITY OF PUBLIC FACILITIES 13
AVAILABILITY OF PUBLIC SERVICES 14
TAX STATUS 14
PROXIMITY TO URBAN GROWTH AREAS 15
PARCEL SIZE 15
LAND USE PATTERNS & INTENSITY OF SURROUNDING LAND USE 15
HISTORY OF PERMITS ISSUED NEARBY 15
LAND VALUES UNDER ALTERNATIVE USES 16
PROXIMITY OF MARKETS 17
HAY/LIVESTOCK PRODUCTIVITY 17
VII. THE STATE OF AGRICULTURE IN CLARK COUNTY 18
POPULATION & DEVELOPMENT TRENDS 20
VIII. RECOMMENDATIONS 22

I. INTRODUCTION

JOHNSON ECONOMICS was retained by a series of property owners 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 subject property is characterized by urban growth. It joins the Ridgefield urban growth boundary (UGB), and almost 1,000 new homes have been built within two miles of the property since 2018. Developed land close to the property is primarily residential, commercial, or industrial, though the immediately surrounding parcels are mostly agricultural.

The availability of public facilities and services is mixed at the subject property. It is outside the City of Ridgefield utility service areas, though Clark Public Utilities recently updated adjacent power and wastewater lines. Schools and emergency services are within three miles and the nearest hospital is about eight miles away.

The soils on the subject property include a range of classifications and are suitable for some crops. The most practical agricultural use is hay, which is currently farmed on portions of the property, or livestock grazing. The site holds some consumptive irrigation rights, but historically, these rights did not provide enough water access to support any crops beyond hay. Additionally, the productivity of potential farm operations is below a profitable level.

The property is designated as agricultural land under Current Use, a tax deferment program. However, most of the parcels are not being farmed as of October 2024, so they no longer meet the criteria to be designated this way. The total assessed fair market value of land and buildings in the developable parcels is $8.75 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.

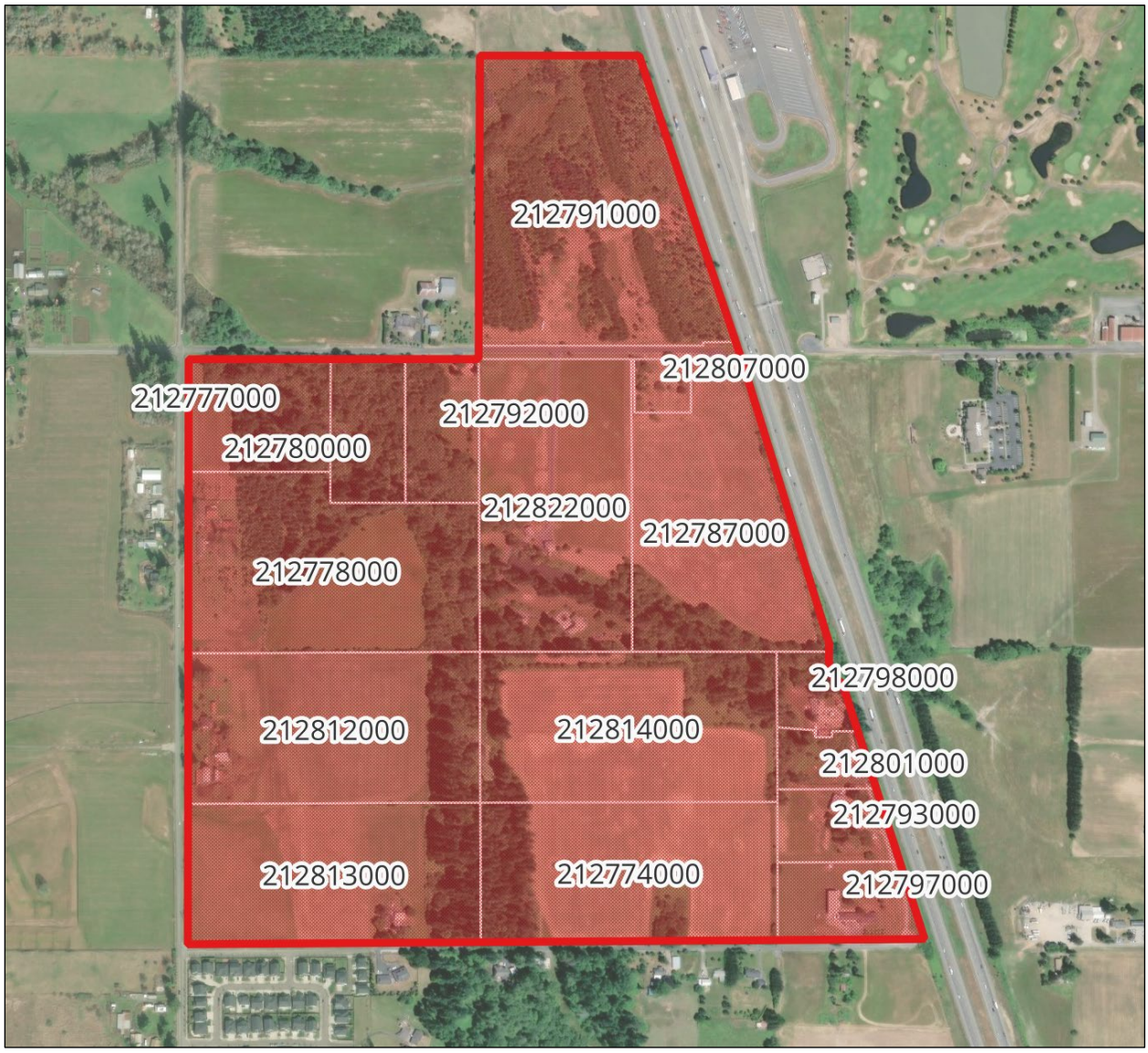
Ridgefield is also trending towards more residential and commercial use and less agricultural use. From 2017 to 2022, Ridgefield's population increased by over 200%, and over 3,000 new residential units (2,500 single-family homes) were permitted within the city. Furthermore, almost 1.2 million square 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 comprised of 16 parcels that total 199.1 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

The property is bound by Interstate 5 to the east.

PROPERTY BACKGROUND

The subject property is comprised of 16 parcels. These are owned by a total of 10 different property owners. Four parcels (on the southeast side of the property) contain homes and are not designated as agricultural land under Current Use, though they are zoned for agriculture.

The large parcel on the north side of the property, parcel 212791000, was a tree farm until around 2015, when it became defunct. It was sold in 2016, and tree farming was attempted again, but most of the trees died due to a lack of available water, according to the property owners. As of October 2024, this parcel is not being farmed.

Through 1998, parcel 212787000 was used for grazing cows and farming strawberries. From 1998 to 2003, the property was leased to a strawberry farmer, but according to the property owners at the time, the farm often did not produce enough strawberries to sell commercially. Since 2003, the parcel has been in weeds and grass and not able to be hayed for commercial purposes. The adjacent small parcel included a home until 2016, when the home was demolished. Parcel 212822000 is also currently in weeds and grass; the owners keep llamas for weed control only.

The four large parcels on the southwest side of the property, parcels 212812000, 212813000, 212814000, and 212774000, make up the Smith Farm. The current owners have had the property since the 1960s, using it for both grazing cows and farming hay, although it has been many years since it was grazed. The owners currently contract with a hay farmer in order to meet the agricultural requirements of Current Use. Parcel 212778000 is also hayed for this reason, though it is owned separately.

The three small parcels on the northwest side of the property, 212777000, 212780000, and 212792000, are mostly trees. There is one home and a small area of grass; these parcels are not being farmed commercially.

If development proceeds on this property, no homes will be retained, except for the home on parcel 212822000. Therefore, we exclude its assessed value from the following analysis.

The first three images below show the north side of the property in 2012, including the tree farm and areas of grass and trees. The last two show grass and trees on the west side in 2023, and an old barn on one parcel.

FIGURE 3.2: STREET VIEW OF PARCELS WITHIN SUBJECT PROPERTY, 2012-2023





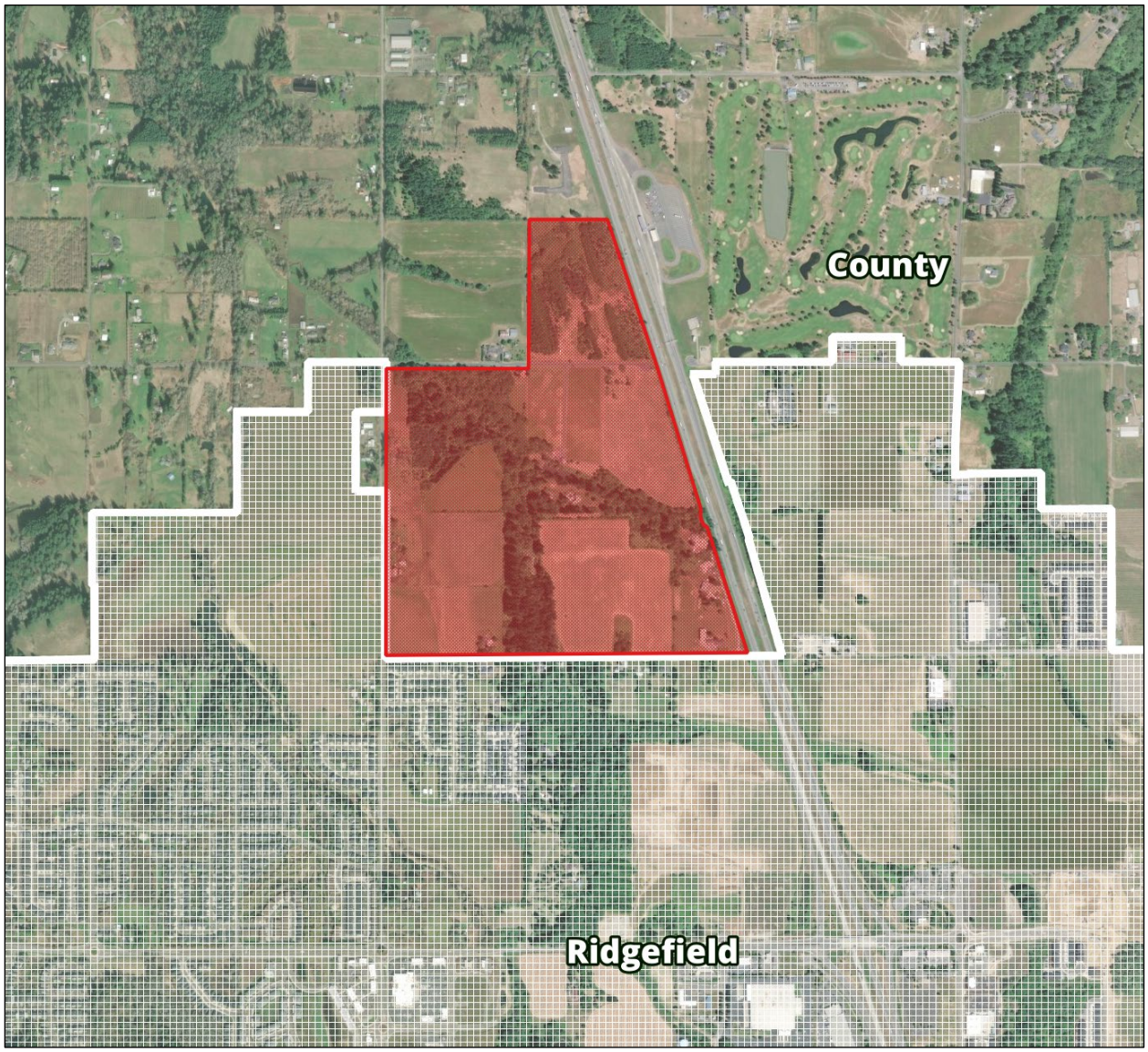
SOURCE: Google Earth, JOHNSON ECONOMICS

Eleven out of the sixteen parcels are within the Current Use program and have been since the development of Clark County's comprehensive plan, which was 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 deferment, 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, east, and south. The parcels on the inside edges of these boundaries are primarily residential, commercial/employment, or parks/open space. These boundaries were last updated in 2022, according to Clark County's GIS system.

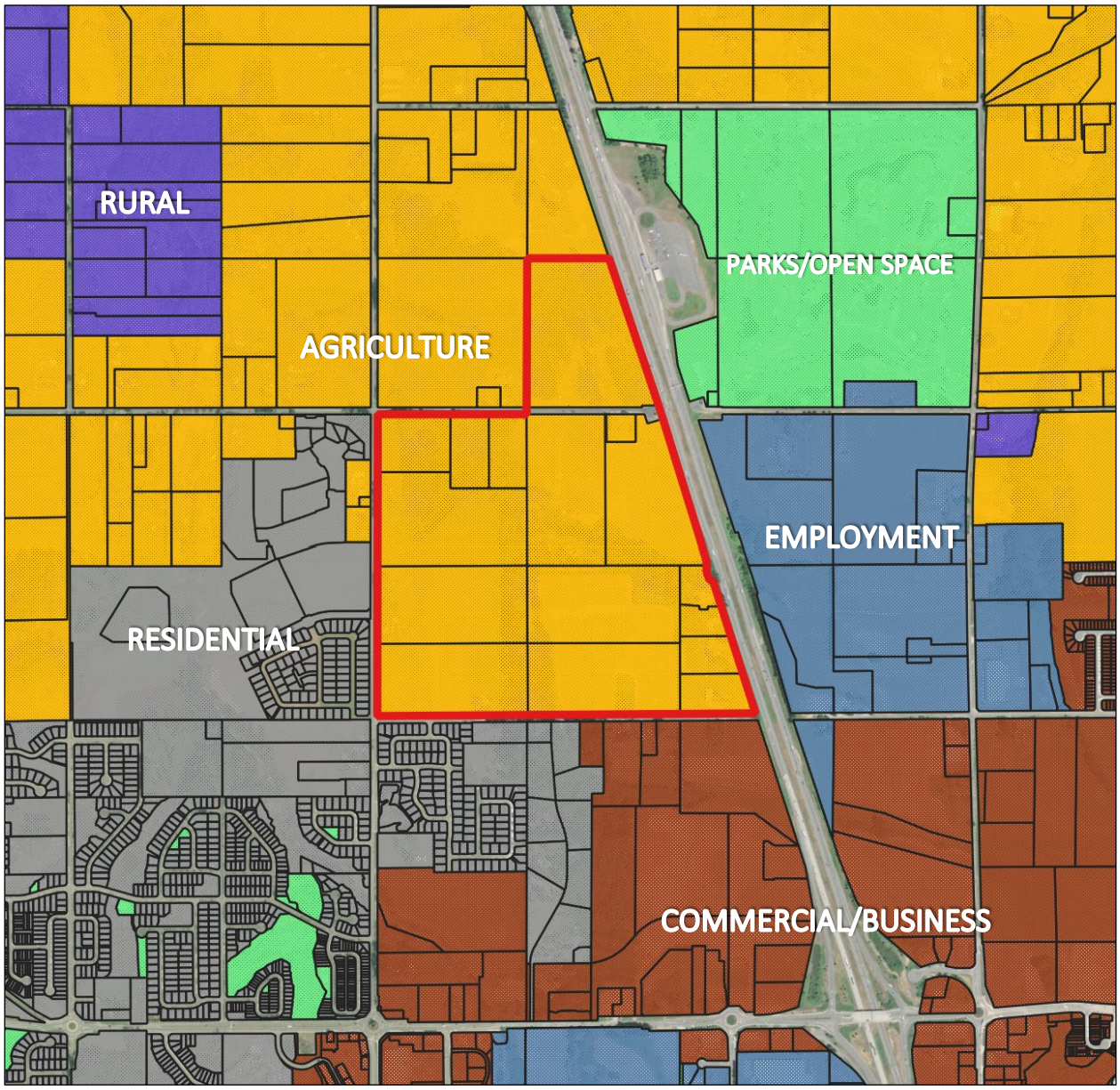
FIGURE 4.1: RIDGEFIELD URBAN GROWTH BOUNDARY, 2022



SOURCE: Clark County, JOHNSON ECONOMICS

The subject property is zoned for agricultural use. Agricultural zoning continues to the north and west of the property. The land to the immediate west, east, and south of the subject property is zoned for residential, commercial/business, and employment (which includes industrial) uses.

FIGURE 4.2: CLARK COUNTY ZONING, SUBJECT AND SURROUNDING PROPERTIES



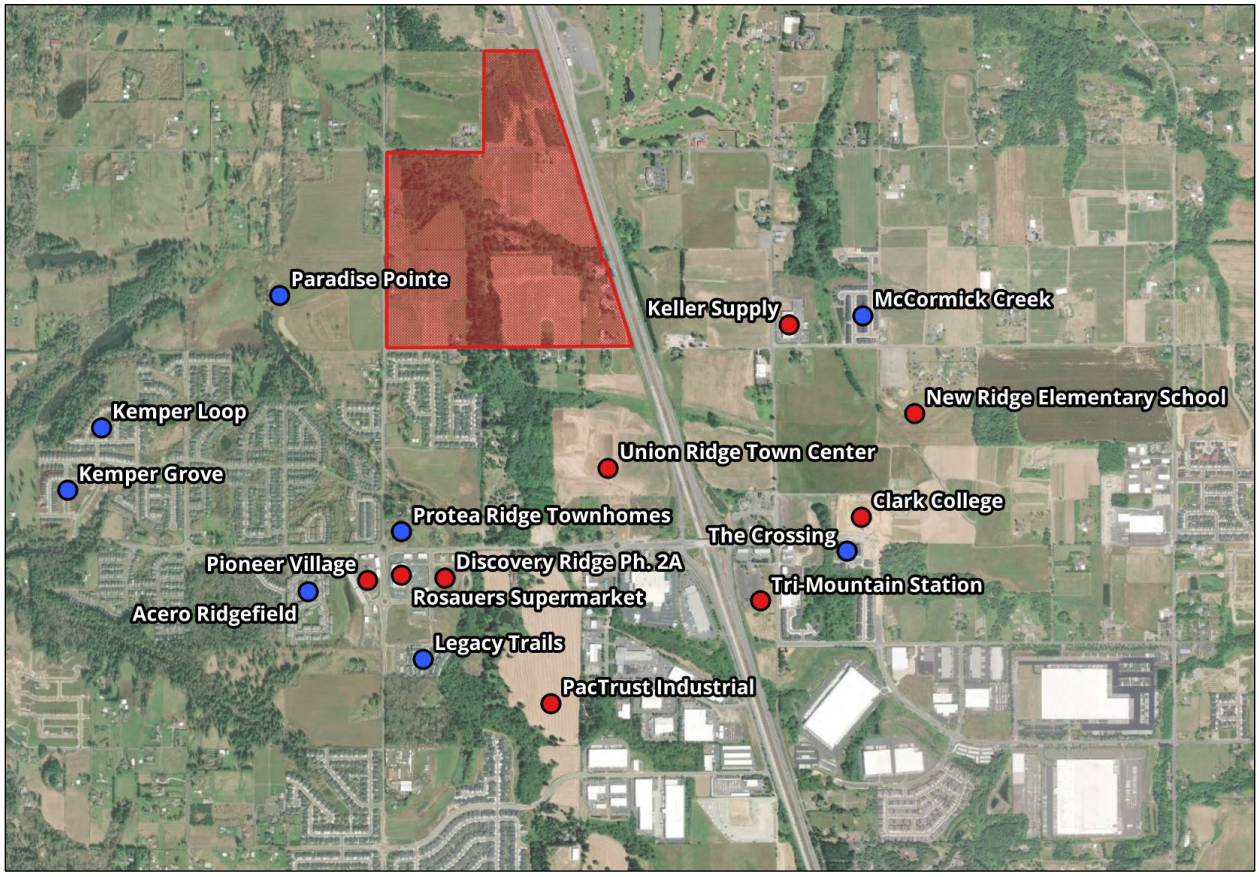
SOURCE: Clark County, JOHNSON ECONOMICS

Within about a mile of the subject property, four subdivisions have been built out since 2018. Kemper Loop and Kemper Grove to the southeast total 241 units. McCormick Creek, to the east of the subject site across I-5, was completed in late 2023 and includes 90 homes. About half a mile to the south of McCormick Creek is The Crossing, a 132-unit townhome development completed in 2023. There are also two complete rental apartment projects: Acero Ridgefield, which was completed in 2019 and includes 300 units, and Legacy Trails, completed in 2021 with 195 units. One subdivision, Paradise Pointe (in some planning documents as Paradise Found), is under construction and will add 296 homes to the area. This is the closest residential development to the subject site. Lastly, Protea Ridge Townhomes, a smaller, 12-unit project, is still in the application process.

There are also several commercial, educational, and industrial developments within the same radius. Union Ridge Town Center to the south is expected to be completed by early 2025. It will have 14 small commercial sites anchored

by Costco. Pioneer Village, which is partially complete, will have 16 small commercial buildings. Tri-Mountain Station, a nine-building commercial center, is still 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 commercial and warehouse buildings. These developments are mapped below: blue points are residential, and red points are commercial/industrial/educational buildings.

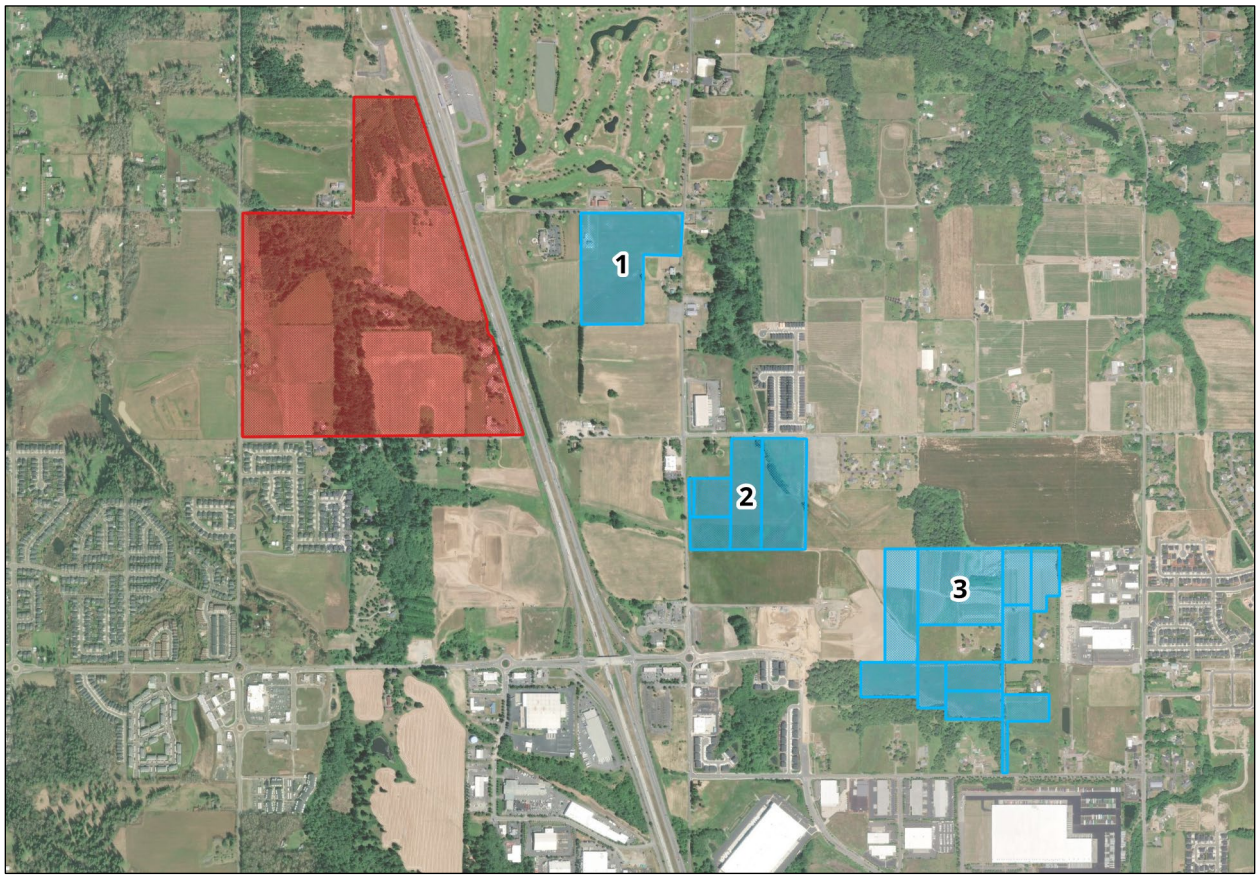
FIGURE 4.3: NEW DEVELOPMENTS IN PROXIMITY, 2024



SOURCE: Clark County, JOHNSON ECONOMICS

Six parcels near the subject site were recently listed for sale (clusters 1-2, 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 2 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

The Smith Farm, which includes four large parcels in the southwest area of the subject property, and a small parcel to the north of those, are the only parts of the property that are currently being farmed. The total farmed area is about 48 acres, or 25% of the subject property area.

For the last several decades, the parcels have only produced hay. According to the property owners, this has been done to keep the properties' grass under control and to meet the requirements of Current Use. The Smith Farm contracts with a hay farmer and is not directly involved in the sale of any hay. The remaining parcels are not being farmed, and the grass and weeds growing on many of them are unsuitable for haying.

FIGURE 5.1: STREET VIEW OF HAYED PARCELS, 2012



SOURCE: Google Earth, JOHNSON ECONOMICS

Within half a mile from the subject site, there are a few small farms. Immediately to the west is Greene Jungle Farm, a small family farm that raises animals on pasture and farms a variety of produce. Millennium Farms to the northeast produces fruit, vegetables, and herb starts. There are also a few stables to the north of the property; these qualify as agricultural land under Current Use.

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 some type of Gee silt loam. GeB is 0-8 percent slopes, GeD is 8-20 percent slopes, GeE is 20-30 percent slopes, and GeF is 30 to 60 percent slopes. The GeB and GeD areas are Class II and IV soils, which, according to the Clark County Assessor, are suitable for most crops and pasture. The land around Allen Creek is GeE, which is Class IV and suitable for some crops, and GeF, which is Class VII and not suitable for any crops, except grazing in some circumstances. There are also a few small areas of Odne silt loam (OdB). This soil type is Class VI and generally not suitable for crops.

FIGURE 6.1: USDA SOIL CLASSIFICATION, 2024

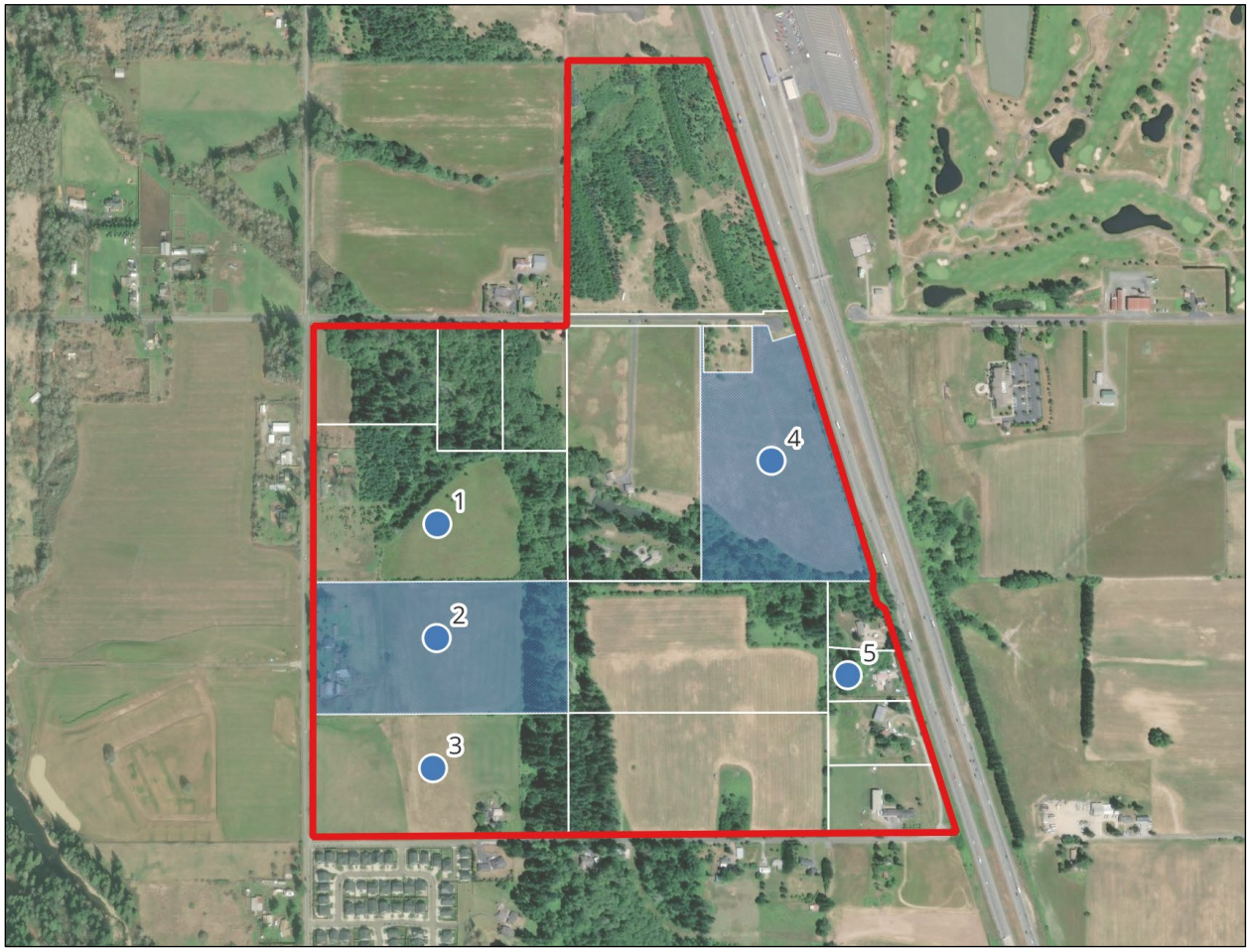


SOURCE: USDA Web Soil Survey, JOHNSON ECONOMICS

Water Resources

Five parcels within the subject property hold water right claims. Three of these (labeled parcels 1, 3, and 5) hold non-consumptive claims for general domestic use, sourced from groundwater wells. Parcel 5 is additionally allowed to irrigate up to 6 acres. The shaded parcels (2 and 4) hold consumptive water right claims. Consumptive water use, which can include consumptive use of groundwater or of surface water, describes water use that removes water from a supply without returning to the supply. Parcel 2, which is part of the Smith Farm, holds a water right claim for 18 acres of irrigation from Allen Creek/Lewis River. Parcel 4's claim is consumptive for municipal use only, and non-consumptive for domestic use and irrigation of up to 6 acres. The other parcels do not hold claims to water rights.

Figure 6.2: Claims to Water Rights, Parcels within Subject Property



SOURCE: Clark County Assessor, Washington Department of Ecology, Johnson Economics

Availability of Public Facilities

To the west of the subject property is North Royle Road, which has two travel lanes, each about 11 feet wide. These are separated by a double yellow line. There are no bike lanes or sidewalks. The posted speed limit along the subject properties is 40 miles per hour, and then 35 miles per hour south of North 10th Street, within the City of Ridgefield. The intersection of North 10th Street and North Royle Road at the southwest corner of the property is controlled by a stop sign on North 10th Street. The intersection of Northwest 289th Street and North Royle Road/Northwest 31st Avenue is controlled by stop signs on Northwest 289th Street. The subject property is, at closest, 1.3 miles (driving distance) from the closest Interstate 5 on ramp.

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 the south and west boundaries of the site. Electric is provided by Clark Public Utilities and water service is provided by the City of Ridgefield. 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

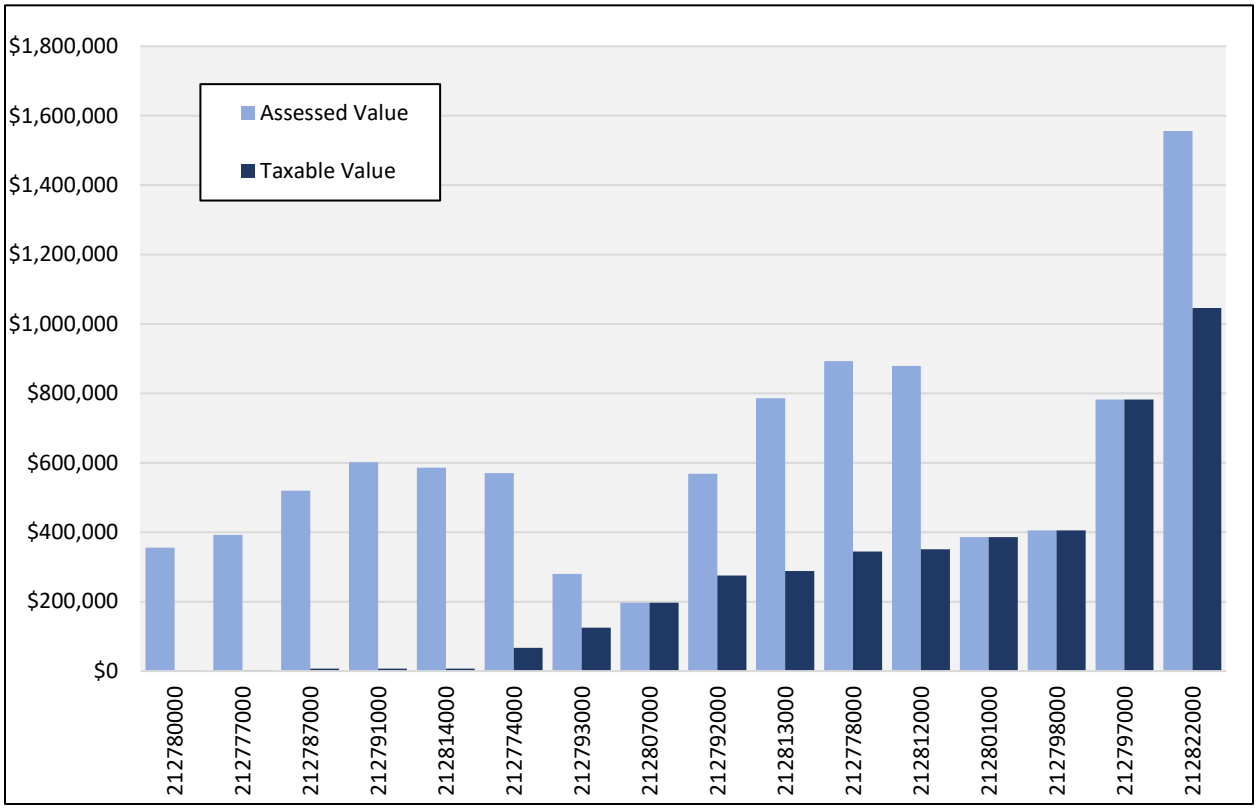
The subject property is about one mile west of the Clark-Cowlitz Fire Rescue Station 21, within the Clark-Cowlitz Fire District. It is about 2.5 miles east of the Ridgefield Police Department. The nearest medical center with an emergency department is Legacy Salmon Creek Medical Center, about eight miles to the south of the subject property. There is a primary and urgent care clinic about half a mile south of the subject property, on Pioneer Street.

The subject property is in the Ridgefield School District, about 2.5 miles west of Union Ridge Elementary School. However, the district is set to begin construction on a new elementary school about a mile east of the subject property if voters approve the construction cost. The property is about 2.5 miles north of Ridgefield High School and View Ridge Middle School.

Tax Status

Eleven out of the sixteen parcels that make up the subject property are designated under the Current Use program as agricultural lands, so they are taxed at a reduced value from their assessed market value. The graph below illustrates the difference between the assessed value and the taxable value under this program.

Figure 6.3: Assessed Value and Taxable Value of Subject Parcels, 2024 Tax Year



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).

As of October 2024, most of the parcels are not dedicated primarily to agriculture; some parcels have not been farmed for over 10 years. The parcels will need to be withdrawn from the program whether the property moves forward with de-designation or not, since the parcels no longer meet the Current Use requirements. 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 total additional back taxes plus interest to be around $563,000.

Proximity to Urban Growth Areas

The subject property is adjacent to the Ridgefield Urban Growth Boundary. It is within one mile of seven residential projects that were recently built or that are under construction, with a total of over 1,200 new homes. Additionally, there are multiple commercial and industrial developments within a mile of the subject property. It is also close to a lot planned for a new elementary school. This demonstrates proximity to urban growth areas.

Parcel Size

The largest parcel, which was previously a tree farm, is 27.2 acres. The hayed parcels, including the ones that currently make up the Smith Farm, are 18.5 to 22 acres, and the smallest parcel is 1.5 acres. These are significantly larger than residential parcels in subdivisions around the site, which range from 0.14 to 0.2 acres. Commercial and industrial parcels to the south range from 1-33 acres; these are similar in size to many of the parcels within the subject property.

Land Use Patterns & Intensity of Surrounding Land Use

There are a few small farms to the north and west of the subject property. To the north is Current Use-designated agricultural land, including a few parcels that appear to have been hayed within the last five years. Immediately to the southwest is a 296-lot subdivision, Paradise Pointe, which is under construction as of October 2024. Farther to the east and south are commercial and industrial centers – many permitted and built within the last 5 years.

New residential development is taking place primarily to the west, east, and south, inside the Ridgefield UGA. As those cities grow, new residential subdivisions will move towards the current UGA boundary and potentially even adjoin the subject property, as is the case with the Paradise Pointe subdivision. 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, six subdivision permits and two multifamily permits have been issued within one mile of the subject property. These have added 958 new homes to the area, not including 308 homes under construction or in planning. Eight commercial and industrial building permits, plus one permit for a new Clark College building and one for an elementary school, have been issued since 2017, leading to over 164,084 completed square feet of commercial and industrial space. There are still 850,050 square feet under construction, and 158,839 SF in permit review. Permits issued nearby indicate strongly that the subject property is characterized by urban growth.

FIGURE 6.4: RESIDENTIAL, COMMERCIAL, AND INDUSTRIAL BUILDING PERMITS ISSUED SINCE 2017

#	Project Name	Address	Type	Status	Permit Year	Units
1	Protea Ridge Townhomes	N Royle Rd & Pioneer St	Townhome	Pre-App.	N/A	12
2	Paradise Found/Paradise Pointe	N 11th-13th; 35th-Royle Rd	Single-Family	Under Constr.	2022	296
3	Acero Ridgefield	4125 S Settler Dr	Multifamily	Complete	2018	300
4	McCormick Creek Ph. 2	N 10th Ave & N Fairhope Pl	Single-Family	Complete	2019	90
5	Kemper Loop	N Kemper Lp & N McCanta Wy	Single-Family	Complete	2019	53
6	Legacy Trails Apartments	540 S Royle Rd	Multifamily	Complete	2020	195
7	The Crossing	441 S 69th Pl	Single-Family	Complete	2020	132
8	Kemper Grove	N 3rd Way & N 30th Dr	Single-Family	Complete	2021	188
Total Residential Units						***1,266***

#	Project Name	Address	Type	Status	Permit Year	SF
9	Tri-Mountain Station	Pioneer St & S 65th Ave	Commercial	Permit Review	N/A	130,205
10	Discovery Ridge Ph. 2A	S 47th Pl & S 48th Pl	Commercial	Permit Review	N/A	28,634
11	Pioneer Village 11, 13, 15-16	Royle Rd & Pioneer St	Commercial	U.C.	2020	46,200
12	Union Ridge Town Center	Pioneer St & S 56th Pl	Commercial	U.C.	2023	255,850
13	Clark College	Pioneer St & NE 259th St	Education	U.C.	2023	49,000
14	PacTrust Industrial Dev.	S Wells Dr	Industrial	U.C.	2023	424,000
15	New Ridge Elementary	7025 N 10th St	Education	U.C.	2024	75,000
16	Rosauers Supermarket	101 S 47th Ave	Commercial	Complete	2018	54,000
17	Keller Supply Company	1200 N 65th Ave	Commercial	Complete	2019	55,868
18	Pioneer Village 1-10, 12, 14	Royle Rd & Pioneer St	Commercial	Complete	2020	54,180
Total SF						***1,172,937***

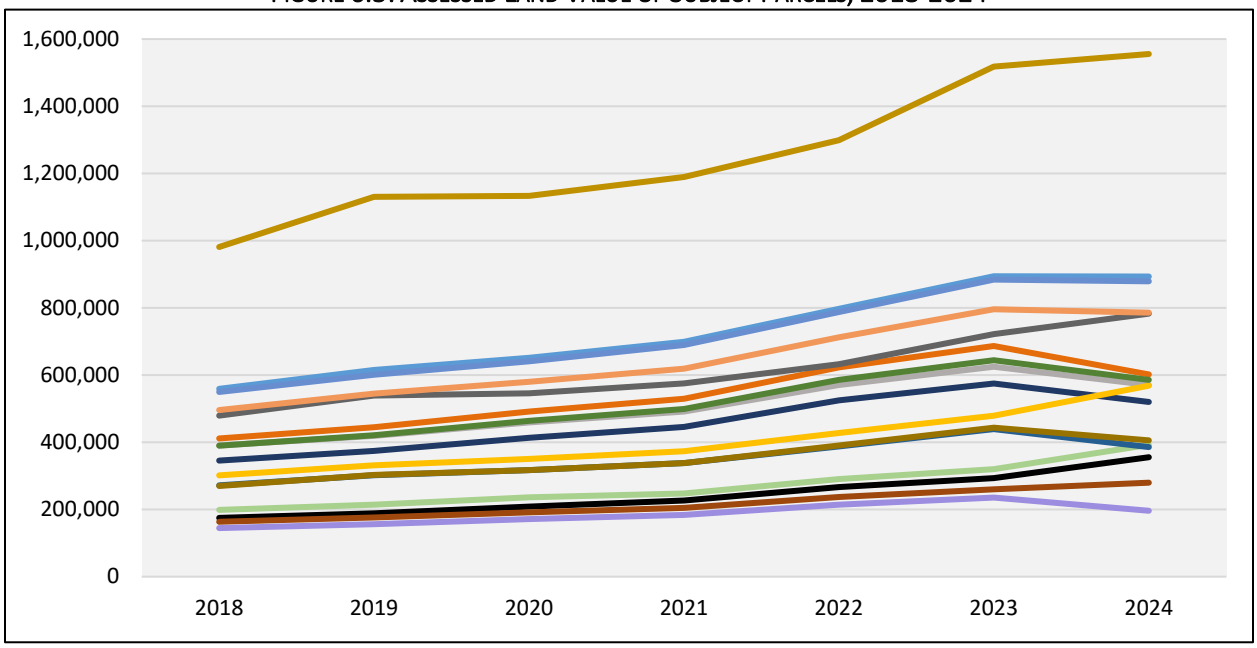
SOURCE: CoStar, Ridgefield Planning Department, Google Earth, local media, JOHNSON ECONOMICS

LAND VALUES UNDER ALTERNATIVE USES

Five parcels are designated fully under Current Use as Open Space or Farm & Agriculture land. These parcels have assessed market values of $355,500 to $601,800. Their taxable values range from $1,759 to $7,506. Per parcel, on average, these taxable values are 10% of assessed values. Six other parcels are also designated under Current Use, but only partially, or they include buildings that are taxed at the full assessed value. On average, those parcels have taxable values around 40% of assessed values. Finally, one parcel is designated under the Senior/Disabled Tax Exemption, and four parcels are taxed at their full assessed values.

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 35-100%, varying with access to roads and the condition of existing buildings. The total value of land and buildings in the parcels is $9.75 million.

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



SOURCE: Clark County Assessor, JOHNSON ECONOMICS

PROXIMITY OF MARKETS

Assuming 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.

HAY/LIVESTOCK PRODUCTIVITY

Hay farming and livestock operations are the two possible options 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 95 acres usable for haying across the entire property, maximum revenue is $123,500 to $148,200 yearly. This figure only includes sales and does not consider any costs, which include labor, equipment, 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 these assumptions, up to 47 calf-cow pairs could be supported on the subject property. 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, and nuisance conflicts with nearby residential and commercial areas.

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 non-agricultural parcels with homes, is over $7 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. 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

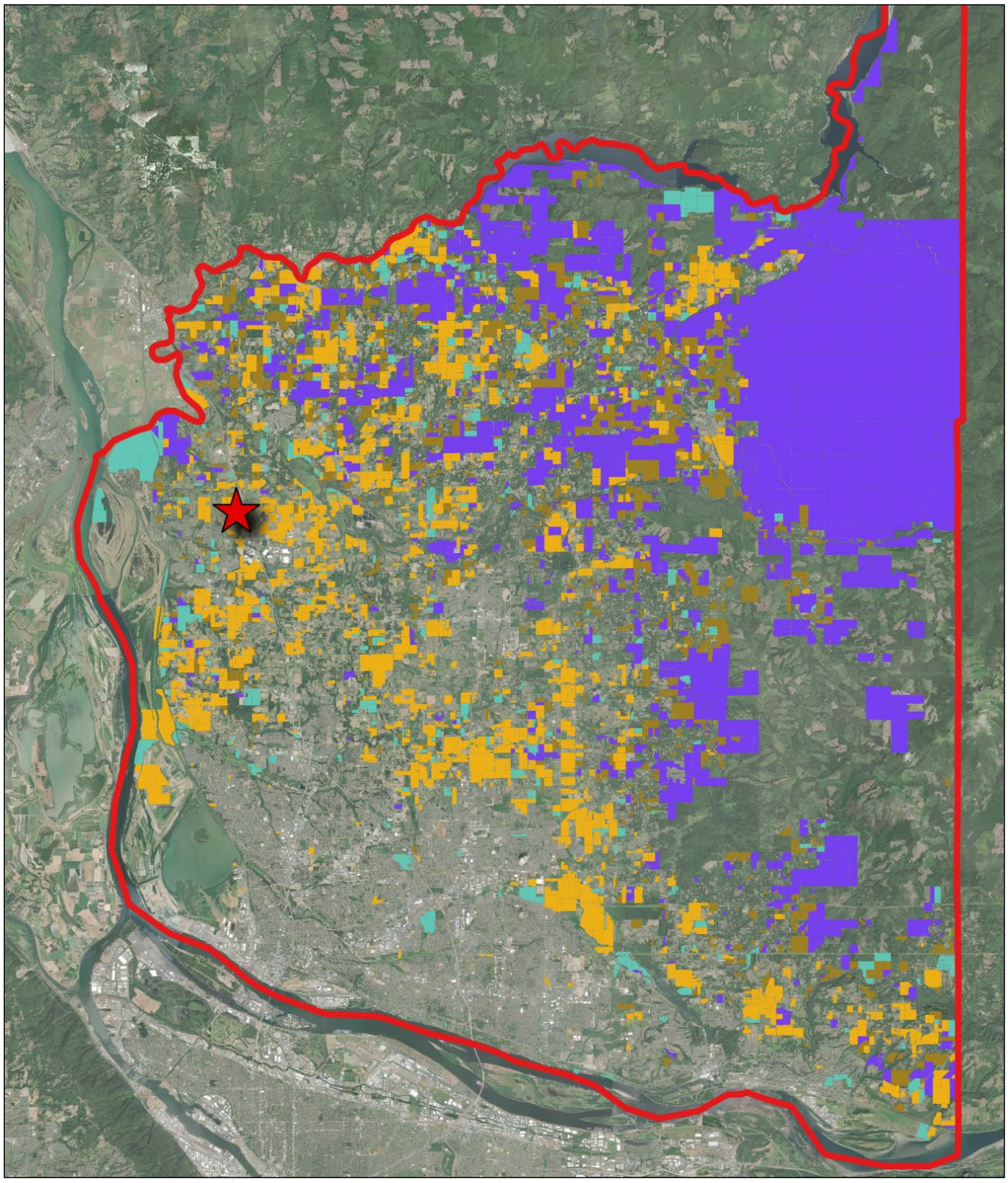
The Washington GMA specifies that a countywide analysis must be conducted for cities and counties to de-designate natural resource lands (including agricultural lands) within the county. This Comprehensive Plan is required by the Washington GMA to be updated by the end of 2025, after its last update 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 includes about 0.4% of the total Current Use designated agricultural land area and less than 0.01% of the total Current Use designated open space land area in Clark County.

FIGURE 7.1: CLARK COUNTY LAND UNDER CURRENT USE, 2024

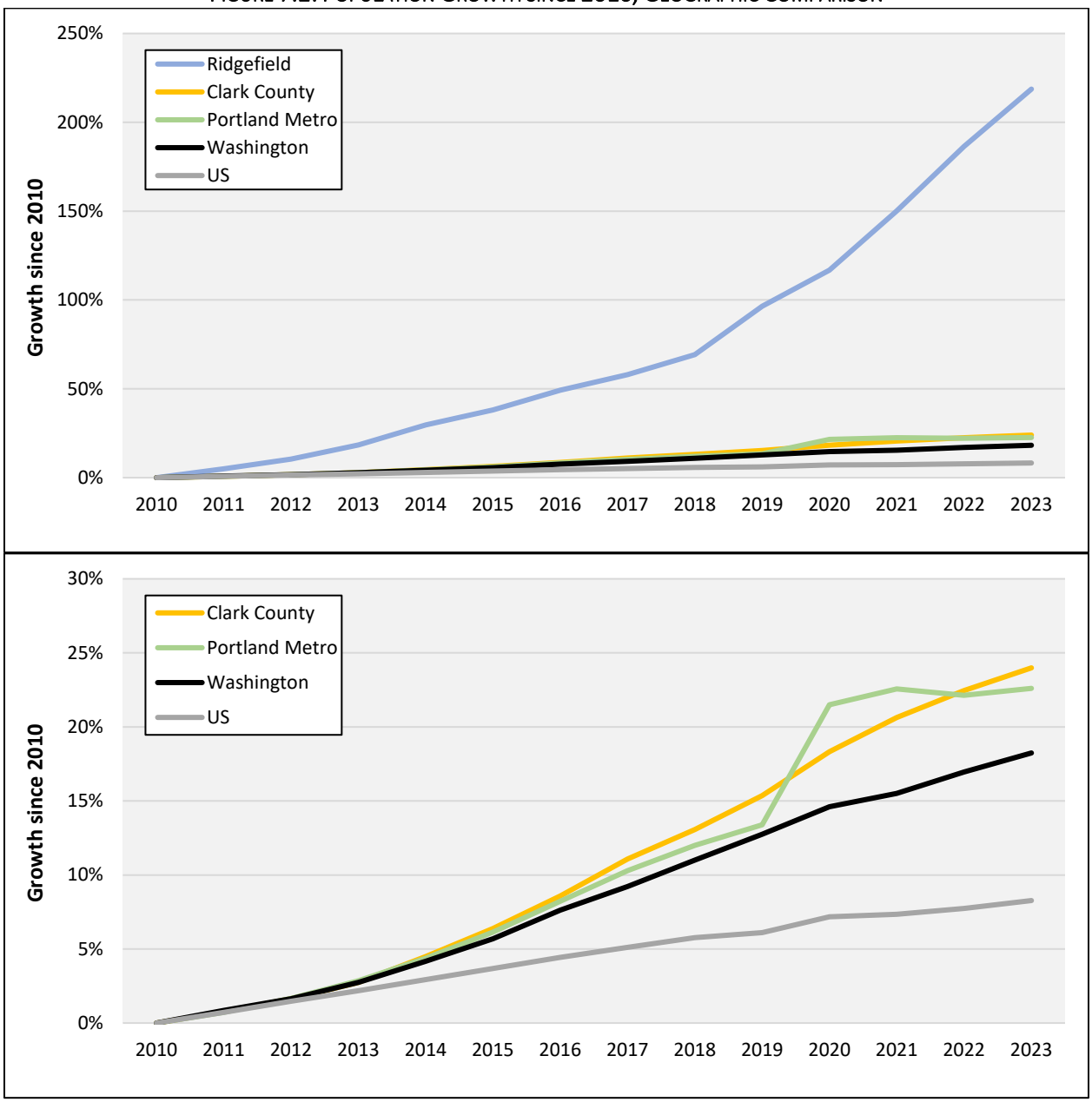


SOURCE: Clark County, JOHNSON ECONOMICS

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

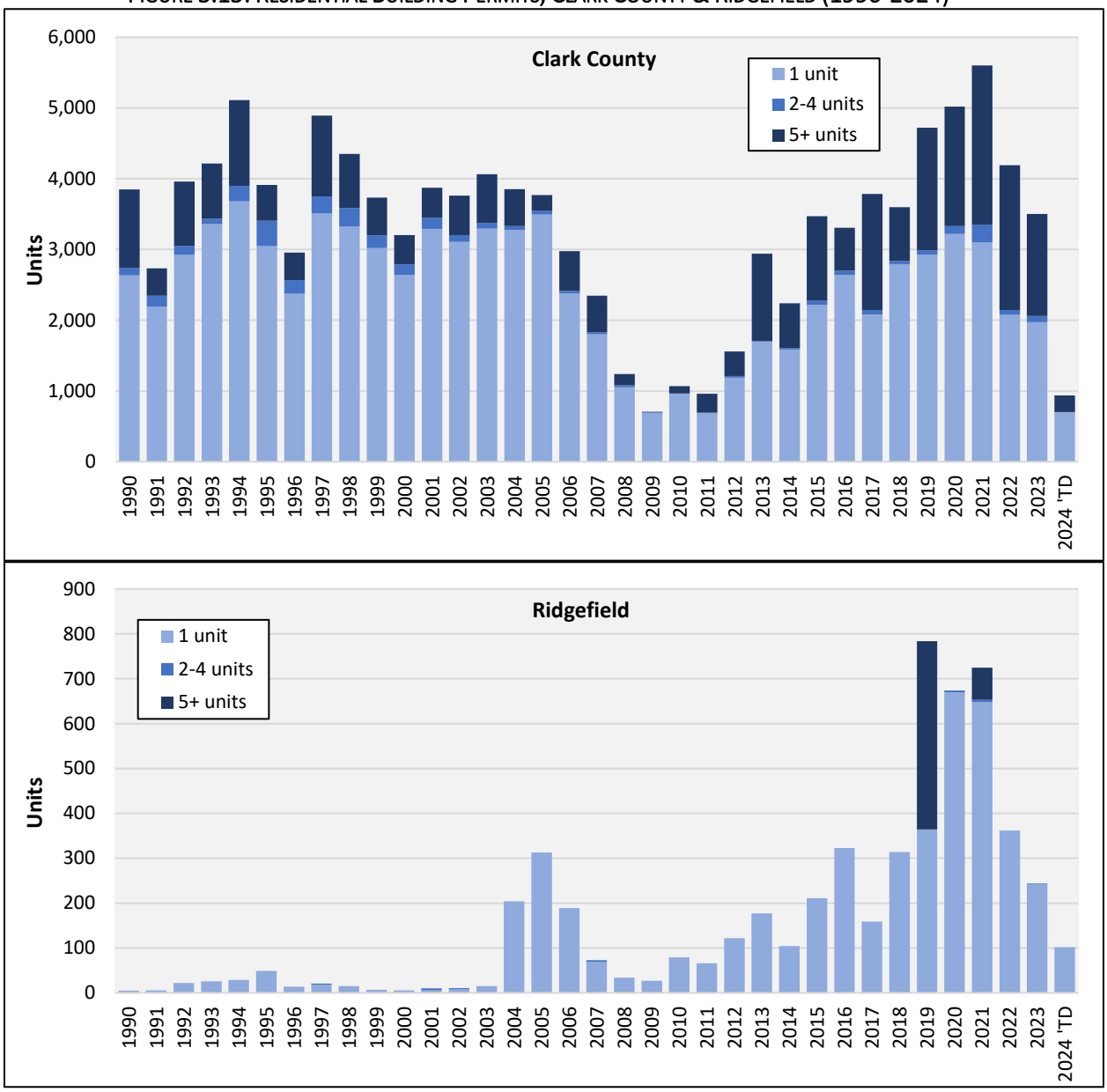


SOURCE: U.S. Census Bureau, Portland State University, WA Office of Financial Management, Johnson Economics

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 5.15: 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 commercial/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.

- While parts of the property are technically being farmed, meeting the second GMA requirement of "the land is used or capable of being used for agricultural production," farming has been greatly reduced in recent years. Only five out of the eleven parcels in Current Use are being farmed at all.

- 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 current hay crop is only produced to preserve the land's tax status, not for commercial purposes. The parcels that are not being farmed are currently unsuitable for haying, and even less suitable for any alternative crops. Farming these parcels would require additional investment.