From:	Oliver Orjiako
To:	Jose Alvarez
Cc:	Jeffrey Delapena
Subject:	FW: Record Submission: Periodic Update (2026-S-14100 and 2026-S-14101)
Date:	Thursday, September 24, 2026 3:11:41 PM
Attachments:	image001.png image002.png Ltr to Clark County re Commerce GMA letter. 9.24.2026 FINAL (compressed).pdf image003.png image004.png image005.png image006.png

---

FYI. Thanks.

OLIVER ORJIAKO
Director
COMMUNITY PLANNING

564.397.2280

From: Garrett K. West <Garrett.West@jordanramis.com>
Sent: Thursday, September 24, 2026 2:32 PM
To: Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>
Cc: James D. Howsley <jamie.howsley@jordanramis.com>; Darlene Ferretti <Darlene.Ferretti@jordanramis.com>
Subject: Record Submission: Periodic Update (2026-S-14100 and 2026-S-14101)

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.

Hello Mr. Orjiako,

Would you please confirm receipt of this email?

Attached is a letter to Clark County regarding the Comprehensive Plan update and responding to the latest communication from the Department of Commerce.

We kindly ask that you include this in the record. If you would prefer a file that has searchable text, please let me know and I'll find a way to deliver it to you via a secure-link (it's a large file).

Reach out if you have any questions or would like to discuss.

Thank you!

Garrett K. West | Attorney
Direct: (503) 598-5528

JORDAN RAMIS

1211 SW Fifth Ave, Suite 2700
Portland OR 97204

jordanramis.com | (888) 598-7070
Portland | Bend | Vancouver WA



DISCLAIMER: This e-mail is for the sole use of the intended recipient(s). It contains information that is confidential and/or legally privileged. If you believe that it has been sent to you in error, please notify the sender by reply e-mail and delete the message. Any disclosure, copying, distribution or use of this information by someone other than the intended recipient is prohibited.

Garrett K West
garrett.west@jordanramis.com
Direct Dial: (503) 598-5528

PACWEST, 27th Floor
1211 SW Fifth Avenue
Portland, OR 97204
T (503) 598-7070
F (503) 598-7373

September 24, 2026

Clark County
c/o Oliver Orjiako, Community Planning Director
oliver.orjiako@clark.wa.gov

Re: Supplemental Submission to the Record – Periodic Update to the Comprehensive Plan and Development Regulations (2026-S-14100 and 2026-S-14101)

Dear Clark County:

Please include this letter in the record for the County's pending periodic update to its comprehensive plan and development regulations.

On September 9, 2026, the Washington Department of Commerce transmitted to the County a comment on the draft comprehensive plan and development regulations. The Department of Commerce's letter identified areas where the proposed amendments needed additional findings to demonstrate compatibility with the Growth Management Act and implementing regulations.

This letter addresses the issues raised by the Department of Commerce related to de-designation. The supporting evidence can generally be found in the three Agricultural Resource Land Analysis Reports produced by Johnson Economics, which are in the record. Those reports examine the relevant lands near Camas, Ridgefield, and La Center. Those reports are also attached.

City	Properties	Report Name	Reports Attached as
Camas:	Southeast Camas Expansion Area (the Nevin/Minturn properties along SE 283rd Ave.)	Johnson Camas Report	Appendix "A"
Ridgefield:	North Ridgefield Expansion Area (the properties west of I-5, north of N 10th St., and east of N Royle Rd.)	Johnson Ridgefield Report	Appendix "B"
		Letter from the City of Ridgefield to Clark County Planning dated October 29, 2024	Appendix "C"
La Center:	South La Center Expansion Area (The properties west of I-5 and east of NW 31st Ave.)	Johnson La Center Report	Appendix "D"

I. Executive Summary

The following information clearly demonstrates that the lands proposed for de-designation no longer meet the designation criteria set forth in WAC 365-091-040(10)(c). This is supported by analyses of WAC 365-190-040(10), WAC 365-190-050, and WAC 365-196-310.

In its letter, Commerce asked for findings demonstrating that the lands proposed for de-designation no longer meet the criteria for agricultural resource land. In plain terms, the findings developed later in this letter—each supported by one of the three Johnson Economics Agricultural Resource Land Analysis Reports—show that these lands no longer qualify: each area is already characterized by urban growth; is not commercially viable for farming because of poor soils, lack adequate water rights, and are experiencing economic turbulence. The properties are surrounded by established and expanding urban and residential development; and adjoin an existing urban growth area. Taken together, these findings demonstrate that the lands satisfy the criteria for de-designation.

II. Camas

The following analyses can be used to supplement the County's findings as it relates to the lands near the City of Camas. Much of this information is already in the record.

A. Introduction

The proposed de-designation of the Southeast Camas Expansion Area (the property) is based on a comprehensive countywide analysis rather than solely on a parcel-by-parcel review. The Johnson Camas Report (*see* Appendix "A") evaluates the property under the agricultural-resource-land designation criteria and provides countywide context concerning agricultural conditions, population growth, and housing development.

The record demonstrates that the property is characterized by urban growth; is limited principally to hay, pasture, and livestock uses. It lacks irrigation rights necessary for higher-value crops, is surrounded by established and expanding residential development, and it cannot reasonably support commercial agricultural operations in light of its productive capacity and market value. The property therefore does not satisfy the statutory standard for agricultural land having long-term significance for commercial production.

B. Detailed Responses to Relevant Statutes

WAC 365-190-040(10) states in relevant part:

> "*(10) Designation amendment process.*
>
> > "*(a) Land use planning is a dynamic process. Natural resource lands review procedures should provide a rational and predictable basis for accommodating change.*

Response: The Johnson Camas Report evaluates the property under the three agricultural-resource-land criteria specified in WAC 365-190-050(3) and considers both site-specific conditions and broader

trends in agriculture, urban growth, and land use in Clark County. The report provides a rational basis for the proposed de-designation by systematically analyzing the property's characterization by urban growth, its current and potential agricultural use, and its lack of long-term commercial significance for agriculture.

The County's periodic comprehensive plan update process provides the procedural framework for reviewing and updating natural resource land designations on a predictable schedule. The de-designation of the property is part of this dynamic planning process and is based on rational application of the designation criteria to changed conditions documented in the record.

> "*(b)*
>
> > *"(i) De-designations of natural resource lands can undermine the original designation process. De-designations threaten the viability of natural resource lands and associated industries through conversion to incompatible land uses, and through operational interference on adjacent lands. Cumulative impacts from de-designations can adversely affect the ability of natural resource-based industries to operate.*
> >
> > "*(ii) Counties and cities should maintain and enhance natural resource-based industries and discourage incompatible uses. Because of the significant amount of time needed to review natural resource lands and potential impacts from incompatible uses, frequent, piecemeal de-designations of resource lands should not be allowed. Site-specific proposals to de-designate natural resource lands must be deferred until a comprehensive countywide analysis is conducted.*

Response: The Johnson Camas Report includes a countywide summary of agricultural conditions in Clark County as of 2022, reporting that the County contained slightly more than 1,900 farms and approximately 56,000 acres of land in farms, representing a 38 percent reduction in farm acreage since 2017. This is not due to re-zoning of agricultural land but to previously-used farmland falling out of production.

The proposed de-designation will not materially undermine the viability of Clark County's agricultural industry or create operational interference with adjacent agricultural lands, as the property is not presently engaged in commercial agriculture and is characterized by urban growth and residential development.

> "*(c) Reviewing natural resource lands designation. In classifying, designating and de-designating natural resource lands, counties must conduct a comprehensive countywide analysis. Counties and cities should not review natural resource lands designations solely on a parcel-by-parcel basis. Designation amendments should be based on consistency with one or more of the following criteria:*

Response: The County's de-designation decision is not based solely on a parcel-by-parcel review. The Johnson Camas Report evaluates the property under the agricultural-resource-land designation criteria

and provides countywide context concerning agricultural trends, population growth, and housing development.

The evidence supports the amendment under the changed-circumstances and new-information criteria, as discussed below.

> "*(i) A change in circumstances pertaining to the comprehensive plan or public policy related to designation criteria in WAC 365-190-050(3), 365-190-060(2), and 365-190-070(3);*

Response: WAC 365-190-060 is not applicable because it relates to forest resource lands, which are not at issue. WAC 365-190-070 is not applicable because it relates to mineral resource lands, which are also not at issue.

The Johnson Camas Report documents substantial changes in circumstances pertaining to public policy related to the designation criteria. The City of Camas has experienced a 42 percent population increase since 2010 and is required to plan for approximately 765 middle housing units and 2,380 apartment units between 2025 and 2045 under countywide housing allocations. Camas is surrounded by agricultural-zoned land and is land-constrained. It does not have the land area for large new residential developments without de-designating some agricultural land—tentative site plans for the property could meet 24 percent of the city's allotted middle housing units.

The Growth Management Act's housing planning requirements, the County's housing allocation policies, and the City of Camas's demonstrated housing needs constitute changes in circumstances pertaining to comprehensive planning and public policy. These changes are related to the designation criteria because they affect the property's proximity to urban growth areas, the intensity of nearby land uses, the history of development permits issued nearby, and land values under alternative uses—all factors identified in WAC 365-190-050(3)(c), findings for which are set forth below.

> "*(ii) A change in circumstances to the subject property, which is beyond the control of the landowner and is related to designation criteria in WAC 365-190-050(3), 365-190-060(2), and 365-190-070(3);*

Response: WAC 365-190-060 is not applicable because it relates to forest resource lands, which are not at issue. WAC 365-190-070 is not applicable because it relates to mineral resource lands, which are also not at issue.

The Johnson Camas Report documents multiple changes in circumstances to the property and surrounding area that are beyond the control of the landowner and are related to the designation criteria in WAC 365-190-050(3), which is set forth below.

The property is now adjacent to the Camas Urban Growth Area on the west and south and is less than one-half mile from the Washougal Urban Growth Area. Almost 800 new homes have been built within two miles of the property since 2013 across four subdivisions, including the 307-home Hills at Round Lake subdivision, the 38-home Magnolia Heights subdivision, and the Northside and Lacamas Hills projects, which collectively represent another 432 home sites. Single-family home development has

also increased outside of subdivisions, especially to the south and east of the property, with Southeast 269th Avenue paved and extended in 2019 to create two new home sites on parcels designated as agricultural land.

The land use around the property is primarily residential or rural, with minimal agricultural use, and that immediately surrounding the property to the west, north, and east are single-family homes on 0.5 to 6 acre lots. Nearby agricultural activities are limited principally to small hay operations, one dairy farm, and a small-scale vegetable farm, with no large commercial farming operations close to the property.

Assessed land values have increased significantly, rising by 62 to 70 percent from 2022 to 2023, reflecting residential development values that substantially exceed what could reasonably be supported by anticipated agricultural income. The assessed value of the property, excluding parcels containing homes, is approximately $5.6 million.

The expansion of urban growth areas, residential development on surrounding properties, changes in the settlement pattern and intensity of nearby land uses, increases in land values driven by residential demand, and the history of recent development permits are all changes in circumstances beyond the control of the landowner and are directly related to the designation criteria in WAC 365-190-050(3)(a) (characterization by urban growth), WAC 365-190-050(3)(c)(v) (proximity to urban growth areas), WAC 365-190-050(3)(c)(vii) (land use settlement patterns), WAC 365-190-050(3)(c)(viii) (intensity of nearby land uses), WAC 365-190-050(3)(c)(ix) (history of development permits), and WAC 365-190-050(3)(c)(x) (land values under alternative uses), all of which are set forth below.

> "*(iii) An error in designation or failure to designate;*

Response: This criterion is not applicable. The proposed de-designation is based on changed circumstances and new information rather than on correction of an error.

> "*(iv) New information on natural resource land or critical area status related to the designation criteria in WAC 365-190-050(3), 365-190-060(2), and 365-190-070(3); or*

Response: WAC 365-190-060 is not applicable because it relates to forest resource lands, which are not at issue. WAC 365-190-070 is not applicable because it relates to mineral resource lands, which are also not at issue.

The Johnson Camas Report provides new information on the agricultural status of the property related to the designation criteria in WAC 365-190-050(3).

The report documents that no crops have been grown on the property for at least 30 years and that intermittent haying was conducted only for weed abatement and fire-hazard mitigation, with no hay sold.

The report evaluates the property's soil classifications under the USDA Natural Resources Conservation Service land-capability classification system and finds that approximately one-half of the property consists of Hesson clay loam classified as Class II and Class IV with erosion constraints, while the eastern portion consists primarily of Powell silt loam and a smaller central area of Odne silt loam,

both classified as Class VI. The report concludes that the soils are most suited for hay, pasture, and some grasses and grains.

The report further identifies that the property lacks adequate water rights for commercial agricultural production. Three parcels have associated groundwater claims, but none are for irrigation of an agricultural crop beyond one-half acre, preventing the production of high-value crops such as berries and vegetables. The report estimates that non-irrigated hay production on approximately 90 usable acres could generate gross revenue of approximately $54,000 before equipment, fertilizer, and labor costs, and that a livestock operation of the scale the property could support would operate at a loss under the budget assumptions examined.

The report also documents that sixteen out of eighteen parcels within the property are designated as agricultural land under the Current Use program but no longer meet the criteria for this designation because the parcels are not devoted primarily to agriculture. Withdrawal from the program would result in approximately $584,900 in back taxes and interest.

The property's historical lack of commercial agricultural use, soil classifications, water rights limitations, agricultural productivity and economic feasibility, and tax status constitutes new information on the property's agricultural resource land status and is directly related to the designation criteria in WAC 365-190-050(3)(b) (used or capable of being used for agricultural production) and WAC 365-190-050(3)(c) (long-term commercial significance for agriculture), as set forth below.

> "*(v) A change in population growth rates, or consumption rates, especially of mineral resources."*

Response: The Johnson Camas Report documents substantial changes in population growth rates in Clark County and the City of Camas.

Clark County has seen population growth of almost 25 percent since 2010, which is equivalent to just over 100,000 people. Over that same period, Camas saw a 42 percent increase in population, while Washougal's growth rate was on par with the County's. All three geographies are growing faster than the Portland Metro Area and the state.

The increasing population in the County indicates a need for more housing, especially in fast-growing areas such as Camas. Recent housing construction in Clark County has roughly been on par with the 1990s, when the County experienced a suburban boom, though the share of multifamily units has increased considerably while single-family construction is below the 1990s level. Since 2015, approximately 2,300 residential units have been permitted in Camas, the vast majority of which (87 percent) are single-family homes.

The documented increase in population growth rates in Clark County and the City of Camas, coupled with increased housing consumption and residential development, constitutes a change in population growth rates. This change is related to the designation criteria because it affects the property's characterization by urban growth, proximity to urban growth areas, availability of public services, intensity of nearby land uses, history of development permits, and land values under alternative uses.

WAC 365-190-050 states in relevant part:

> "*(1) In classifying, designating and de-designating agricultural resource lands, counties must conduct a comprehensive countywide analysis consistent with WAC 365-190-040(10). Counties and cities should not review resource lands designations solely on a parcel-by-parcel basis. * * *.*
>
> * * *

Response: The criteria of WAC 365-190-040(10) are set forth above. The Johnson Camas Report evaluated the property under the three agricultural-resource-land criteria and considered both site-specific conditions and broader countywide trends in agriculture, urban growth, and land use.

The proposed de-designation is not based solely a parcel-by-parcel analysis.

> *"(3) Lands should be considered for designation as agricultural resource lands based on three factors:*
>
> > *"(a) The land is not already characterized by urban growth. To evaluate this factor, counties and cities should use the criteria contained in WAC 365-196-310.*

Response: The relevant provisions of WAC 365-196-310 are addressed below. WAC 365-196-310 recognizes that territory outside a city may be included within an urban growth area when it is already characterized by urban growth or is adjacent to territory already characterized by urban growth.

The property abuts the Camas city limits to the southwest. The Johnson Camas Report explains that the property is also adjacent to the Camas Urban Growth Area on the west and south and is less than a half mile from the Washougal Urban Growth Area. Land within the adjoining urban growth areas is zoned for residential use, while surrounding rural parcels commonly range from approximately one-half acre to six acres and contain single-family residences.

The report also identifies almost 800 recently completed or developing home sites within two miles of the property. These include the 307-home Hills at Round Lake subdivision, the 38-home Magnolia Heights subdivision, and the Northside and Lacamas Hills projects, which collectively represent another 432 home sites. Residential development has also occurred outside subdivisions, including new home sites created after the extension and paving of Southeast 269th Avenue.

Further, nearby utilities and public facilities also demonstrate the lands' urban context. There are power lines to the immediate west of the property. The property is within the Camas School District and lies approximately three-quarters of a mile from Camas High School, one-half mile from Woodburn Elementary School, and two miles from Liberty Middle School. These provide sufficient utilities and public facilities for urban-level development.

Based on the property's immediate proximity to two urban growth areas, surrounding residential development, nearby subdivision activity, and the residential character of adjoining land, the property is characterized by urban growth.

> *"(b) The land is used or capable of being used for agricultural production. This factor evaluates whether lands are well suited to agricultural use based primarily on their physical and geographic characteristics. Some agricultural operations are less dependent on soil quality than others, including some livestock production operations.*

Response: The Johnson Camas Report explains both the property's historical use and its physical and geographic suitability for agriculture. No crops have been grown on the property for at least 30 years. Portions of the property have periodically been hayed for weed abatement and fire-hazard mitigation, but the resulting hay was not sold.

The report concludes that approximately 90 of the property's 161.2 acres are presently usable for farming, with the remainder occupied by residences, trees, or other constraints. The potentially viable agricultural uses are principally non-irrigated hay production and livestock grazing.

Importantly, the property lacks the water rights needed to irrigate commercial crops beyond one-half acre, materially limiting its ability to support higher-value crops such as berries and vegetables. Indeed, there are no there any water rights available within the Water Resource Inventory Area. There is a very low likelihood of securing additional water rights from the private market as they are cost prohibitive. The lack of water makes farming highly improbable due to the inability to grow crops.

Portions of the property are physically capable of limited hay, pasture, or livestock use. That limited capability does not, by itself, establish that the property constitutes agricultural resource land of long-term commercial significance. When the property's physical limitations are considered with its lack of irrigation rights, absence of agricultural infrastructure, limited productive acreage, and surrounding development pattern, the record demonstrates that its agricultural capability is restricted to low-intensity uses that are not commercially sustainable at this location.

These factors weigh in favor of a finding that the land is not well suited to agricultural use.

> *(i) Lands that are currently used for agricultural production and lands that are capable of such use must be evaluated for designation. The intent of a landowner to use land for agriculture or to cease such use is not the controlling factor in determining if land is used or capable of being used for agricultural production. Land enrolled in federal conservation reserve programs is recommended for designation based on previous agricultural use, management requirements, and potential for reuse as agricultural land.*

Response: The lands are not currently in agricultural production and agricultural use has ceased.

While the landowner's intent is not controlling, the cessation of agricultural operations is relevant evidence when considered with other factors. The Johnson Camas Report examines objective evidence concerning historical production, present land conditions, soil capability, water availability, productive acreage, and the economics of reasonably available agricultural uses.

The report documents that the property has not produced crops for at least 30 years and that intermittent haying was conducted for weed and fire control rather than commercial sale. It nevertheless evaluates the property's capability for future hay and livestock production, including expected yields, acreage requirements, equipment and labor needs, and likely operating returns. The report also identifies nearby small-scale hay, Christmas-tree, dairy, and produce operations, thereby considering agricultural uses occurring under local conditions.

The lands are not enrolled in a federal conservation reserve program. That means this sub-factor does not weigh in favor of keeping the designation.

Based on the objective evidence, rather than the owners' stated intentions, the property is not currently devoted to commercial agricultural production and that its potential agricultural uses are too limited to establish long-term commercial significance.

> *(ii) In determining whether lands are used or capable of being used for agricultural production, counties and cities shall use the land-capability classification system of the United States Department of Agriculture Natural Resources Conservation Service as defined in relevant Field Office Technical Guides. These eight classes are incorporated by the United States Department of Agriculture into map units described in published soil surveys, and are based on the growing capacity, productivity and soil composition of the land.*

Response: The Johnson Camas Report expressly applies the United States Department of Agriculture Natural Resources Conservation Service land-capability classification system and relies on mapped soil units from the USDA soil survey.

Approximately one-half of the property consists of Hesson clay loam, classified as Class II and Class IV with an erosion subclass. The Clark County Assessor identifies hay, pasture, and some grasses as the most appropriate crops for those soils. The eastern portion consists primarily of Powell silt loam, with a smaller central area of Odne silt loam; those soils are classified as Class VI and are most suitable for hay, pasture, and certain grains and grasses.

Although some soils are physically capable of agricultural use, the property contains a substantial amount of Class IV and Class VI land and is principally suited to hay, pasture, grasses, and limited grain production. When considered with the property's erosion constraints, limited irrigation rights, existing residences and wooded areas, and lack of agricultural infrastructure, the soil classifications do not establish commercially sustainable agricultural capability.

> *(c) The land has long-term commercial significance for agriculture. In determining this factor, counties and cities should consider the following nonexclusive criteria, as applicable:*
>
> > *(i) The classification of prime and unique farmland soils, and farmlands of statewide importance, as mapped by the Natural Resources Conservation Service;*

Response: This issue was addressed in the record through the Johnson Camas Report's review of Natural Resources Conservation Service soil mapping and land-capability classifications. The mapped soils range from Class II to Class VI. A substantial portion of the property is Class IV or Class VI land principally suited to hay, pasture, grasses, and limited grain production.

The Clark County Agricultural Lands Study (2025) indicates that the property has both prime farmland and also soil that is neither prime farmland or of statewide importance. A copy of that map is on the next page, along with a more detailed view. Importantly, the other lands that could be included in the City of Camas Urban Growth Area are almost all completely prime farmland. This makes de-designation of this property, given its mixed soil types, the most logical course of action.

> *(ii) The availability of public facilities, including roads used in transporting agricultural products;*

Response: Southeast 283rd Avenue provides the property's only direct road access. It has two 10-foot travel lanes, no shoulders, a posted speed limit of 40 miles per hour, and stop-sign-controlled intersections. No adjacent road is included in the County's Six-Year Transportation Improvement Plan.

While the roads are physically capable of accommodating agricultural vehicles, the level of urban development on adjacent and surrounding lands means that intensive agricultural transport would inhibit residential uses and normal non-agricultural traffic, which predominates the area.

The property is outside the City of Camas's identified future sewer-service area, although it adjoins that area on its western boundary. It lies within the City's future water-service boundary, an existing water main runs along the western boundary, and the City has identified future water-system improvements in the surrounding area.

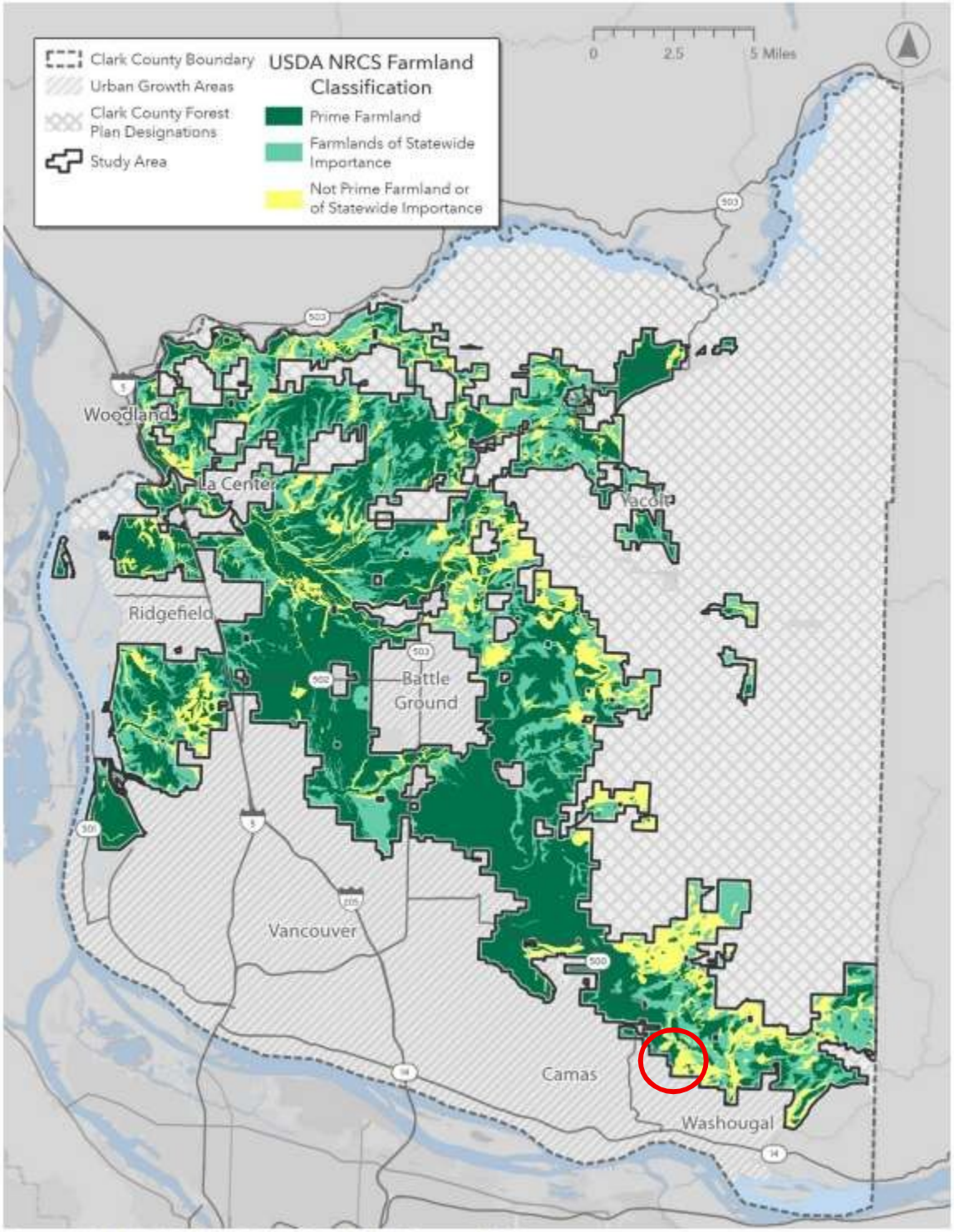
The property is near several public facilities. The property is approximately 1.5 miles from East County Fire and Rescue Station 91, approximately two miles from downtown Camas and the city police station, and approximately 11 miles from the nearest hospital emergency department. It is within the Camas School District and lies approximately three-quarters of a mile from Camas High School, one-half mile from Woodburn Elementary School, and two miles from Liberty Middle School. These provide sufficient public facilities for urban-level development.

Public-facility availability is mixed. Existing road access permits entry to the property but is not configured as a significant agricultural transportation corridor. Planned and existing water infrastructure reflects the property's relationship to adjoining urban development, while the absence of sewer service reflects its current location outside the urban growth area. Available schools close-by reflect the area's growing urban character. On balance, this factor does not establish long-term commercial significance for agriculture.

//

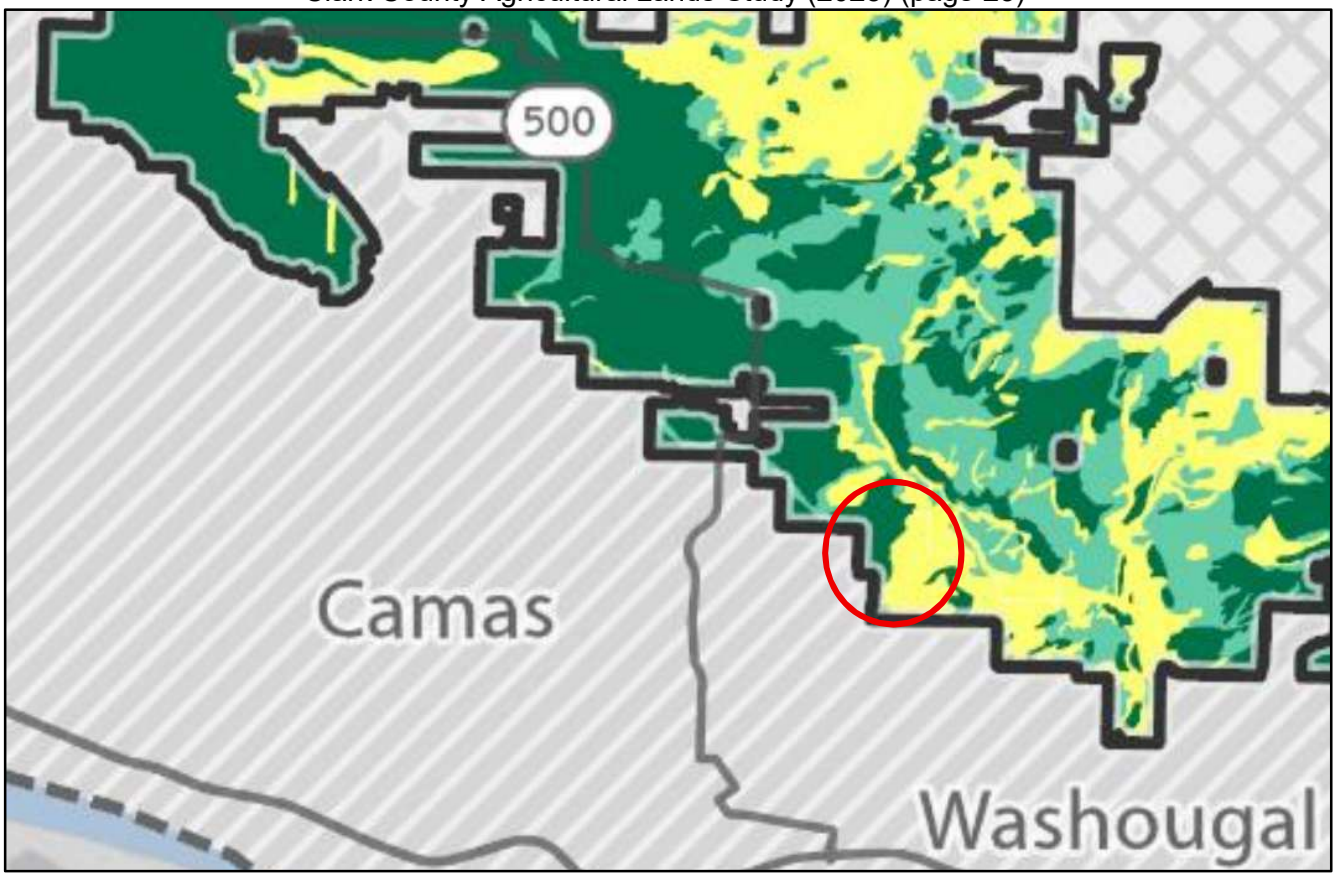
//

Clark County Agricultural Lands Study (2025) (page 23)



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

Clark County Agricultural Lands Study (2025) (page 23)



(iii) Tax status, including whether lands are enrolled under the current use tax assessment under chapter 84.34 RCW and whether the optional public benefit rating system is used locally, and whether there is the ability to purchase or transfer land development rights;

Response: Sixteen of the property's 18 parcels have been enrolled as agricultural land under the Current Use program since at least 2006. The Johnson Camas Report concludes that the parcels are no longer devoted primarily to agriculture and therefore no longer satisfy the program's requirements. It estimates that withdrawal would result in approximately $584,900 in back taxes and interest.

Current-use enrollment is evidence relevant to the property's tax treatment, but it does not establish actual commercial production or long-term commercial significance. Here, the objective evidence shows that the property has not been commercially farmed for decades notwithstanding its tax classification.

Clark County does not currently have an optional public benefit rating system. As a result, that sub-factor is not relevant.

Based on the property's lack of commercial agricultural production and the absence of evidence that a development-rights program would make agricultural production economically sustainable, this factor does not support continued designation.

(iv) The availability of public services;

Response: The property is approximately 1.5 miles from East County Fire and Rescue Station 91, approximately two miles from downtown Camas and the city police station, and approximately 11 miles from the nearest hospital emergency department. It is within the Camas School District and lies approximately three-quarters of a mile from Camas High School, one-half mile from Woodburn Elementary School, and two miles from Liberty Middle School.

The proximity of fire protection, schools, law enforcement, medical facilities, and other urban services reflects the property's location near an established and expanding urban community. This service pattern is more consistent with the surrounding residential and urbanizing environment than with an isolated agricultural production area. This factor does not establish long-term commercial significance for agriculture.

(v) Relationship or proximity to urban growth areas;

Response: The property directly adjoins the Camas Urban Growth Area and is less than one-half mile from the Washougal Urban Growth Area. It is also within two miles of four recently completed or developing subdivisions containing nearly 800 home sites.

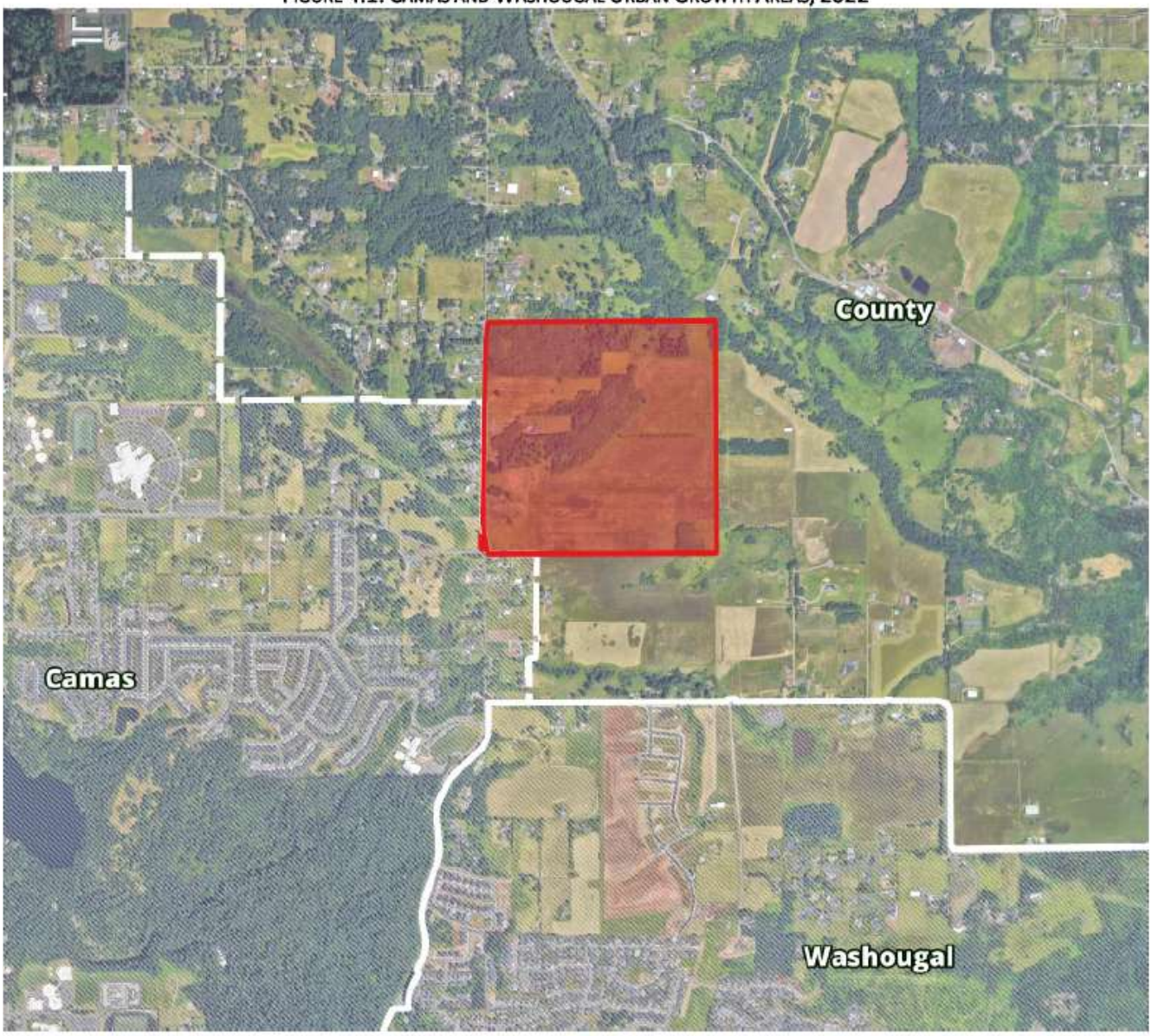
The property's immediate relationship to two urban growth areas, coupled with substantial nearby residential construction, strongly indicates urban influence and continuing development pressure. This factor weighs against a finding of long-term commercial significance for agriculture.

(vi) Predominant parcel size, which may include smaller parcels if contiguous with other agricultural resource lands;

Response: The property consists of 18 parcels totaling approximately 161.2 acres. Individual parcels range from two acres to 79.2 acres, but most are approximately five acres. Two parcels contain occupied residences, and each five-acre parcel may accommodate a dwelling under existing entitlements.

The northern portion's subdivision into predominantly five-acre parcels and its existing residential development reduce its suitability for unified commercial agricultural operation. The southern portion could be further divided into twenty-acre parcels. Although some adjoining properties remain in current-use classifications and limited agricultural uses occur nearby, the surrounding area does not contain a contiguous concentration of large commercial farms. The predominant parcel pattern weighs against long-term commercial agricultural significance.

FIGURE 4.1: CAMAS AND WASHOUGAL URBAN GROWTH AREAS, 2022



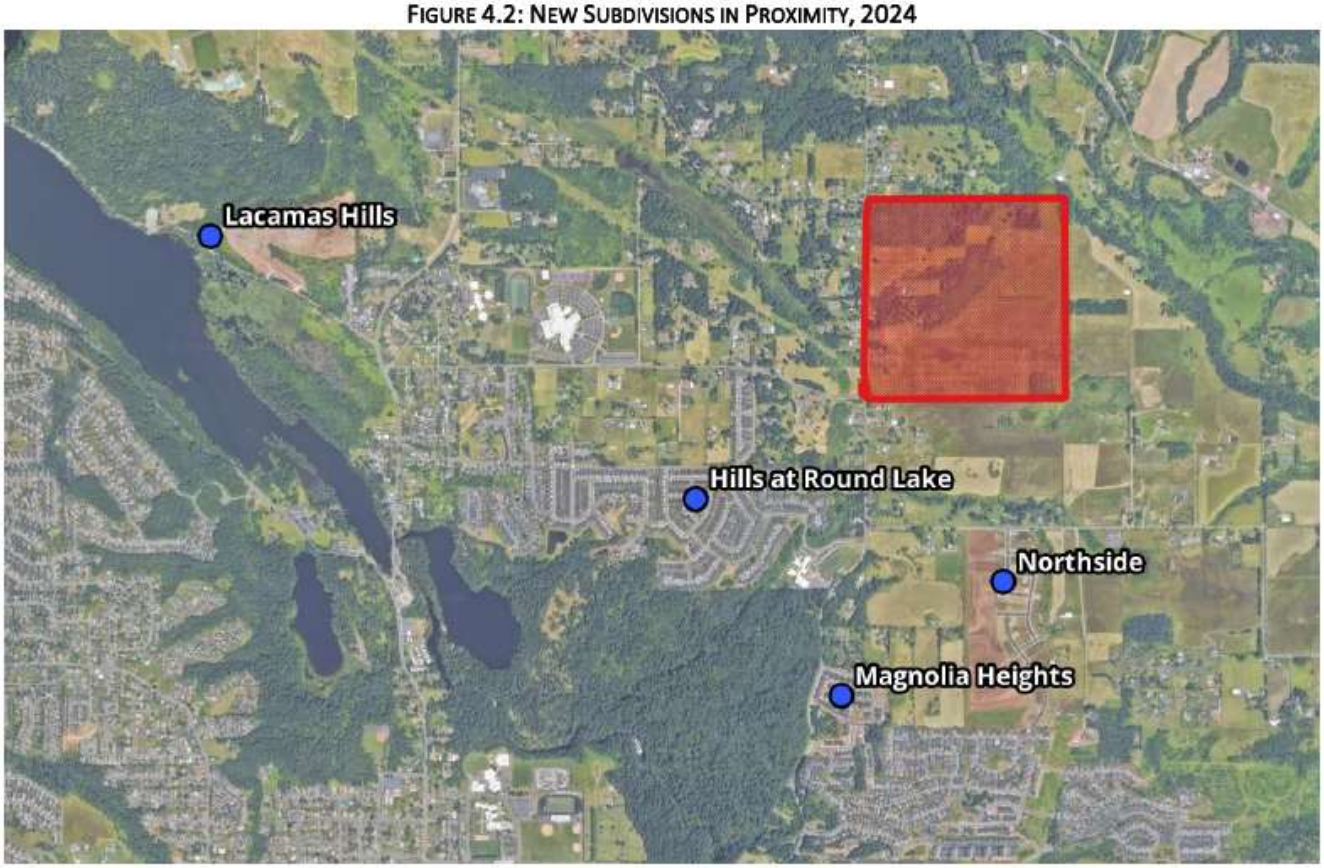
SOURCE: Clark County, JOHNSON ECONOMICS

(vii) Land use settlement patterns and their compatibility with agricultural practices;

Response: Single-family residences on parcels ranging from approximately one-half acre to six acres immediately surround the property to the west, north, and east. Nearby agricultural activities are limited principally to small hay operations, one dairy farm, and a small-scale vegetable farm; no large commercial farming operation is located near the property.

The Johnson Camas Report also identifies potential odor, mud, and nuisance conflicts between livestock production and nearby residences. The established settlement pattern is predominantly rural-residential and increasingly urban, creating compatibility constraints for commercial farming. This factor weighs against continued agricultural-resource designation.

FIGURE 4.2: NEW SUBDIVISIONS IN PROXIMITY, 2024



SOURCE: Clark County, JOHNSON ECONOMICS

(viii) Intensity of nearby land uses;

Response: The property is adjacent to the Camas city limits. The Johnson Camas Report explains that nearby land uses include single-family residences, recently completed subdivisions, subdivisions under construction, public schools and services, and expanding urban development within the Camas and Washougal urban growth areas. Residential development is advancing principally from the west and south toward the property.

The intensity and trajectory of nearby residential development are inconsistent with the property's long-term use as part of a commercially significant agricultural land base. This factor supports de-designation.

//

(ix) History of land development permits issued nearby;

Response: During the five years evaluated in the Johnson Camas Report, three subdivision permits were issued within two miles of the property: Magnolia Heights for 38 homes, Northside for 280 homes, and Lacamas Hills for 152 homes. The nearby permits were overwhelmingly residential.

The history of nearby permit activity demonstrates sustained residential development pressure and an ongoing transition toward urban and suburban land uses. This factor weighs against long-term commercial significance for agriculture.

(x) Land values under alternative uses; and

Response: As explained by the Johnson Camas Report, under the Current Use program, the five-acre parcels are assigned taxable values of approximately $1,400 to $2,500 per parcel, while their assessed fair-market values range from approximately $250,000 to $378,000 per parcel. The 79-acre parcel is valued at approximately $111,000 under Current Use and $811,800 at fair-market value. The assessed value of the property, excluding parcels containing homes, is approximately $5.6 million.

The report concludes that these values reflect residential-development demand and substantially exceed what could reasonably be supported by anticipated agricultural income. Assessed values also increased by approximately 62 to 70 percent from 2022 to 2023.

If the property were urbanized, the assessed value would be much higher and be a great benefit to the public.

The disparity between agricultural earning capacity and market value makes acquisition or continued operation for commercial agriculture economically impracticable. This factor strongly weighs against a finding of long-term commercial significance.

(xi) Proximity to markets.

Response: The Johnson Camas Report identifies potential local markets for limited hay sales to small livestock operations. Larger quantities would likely need to be marketed farther away, including in the Willamette Valley, and commercial cattle-processing facilities are relatively distant and limited in number.

Proximity to potential consumers does not overcome the property's restricted crop options, lack of irrigation rights, limited productive acreage, required capital investment, and high land value. The available markets are insufficient to make the agricultural uses reasonably available to the property commercially sustainable. This factor does not establish long-term commercial significance.

//

//

WAC 365-196-310 states in relevant parts:

> "*(1) Requirements.*
>
> * * *
>
> *"(c) An urban growth area may include territory that is located outside a city if such territory already is characterized by urban growth or is adjacent to territory already characterized by urban growth.*

Response: The property satisfies both prongs of WAC 365-196-310(1)(c): it is adjacent to territory already characterized by urban growth, and it is itself characterized by urban growth.

Adjacency to Urban Growth. The property is immediately adjacent to the Camas Urban Growth Area on its west and south boundaries and lies less than one-half mile from the Washougal Urban Growth Area. Land within both adjoining urban growth areas is zoned for residential use. The property is therefore directly contiguous to territory already characterized by urban growth.

Characterized by Urban Growth. The Johnson Camas Report documents pervasive residential development in the surrounding area consistent with urban growth. Nearly 800 recently completed or developing home sites exist within two miles of the property, including the 307-home Hills at Round Lake subdivision, the 38-home Magnolia Heights subdivision, and the Northside and Lacamas Hills projects, which collectively represent an additional 432 home sites. Residential development has also occurred outside of formal subdivisions, including new home sites created following the extension and paving of Southeast 269th Avenue. Surrounding rural parcels commonly range from approximately one-half acre to six acres and contain single-family residences, reflecting a residential land use pattern inconsistent with continued agricultural resource land designation.

Public facilities further confirm the property's urban context. The property lies within the Camas School District and is approximately three-quarters of a mile from Camas High School, one-half mile from Woodburn Elementary School, and two miles from Liberty Middle School. Emergency services are provided by East County Fire & Rescue Station 91, located approximately 1.5 miles from the property, and law enforcement is provided by the Clark County Sheriff's Office. A gravity-fed water main is immediately adjacent to the property, and the property falls within the Camas city water utility's future service area.

Based on its immediate adjacency to the Camas and Washougal Urban Growth Areas, the density and character of surrounding residential development, the presence of major nearby subdivisions, and the availability of public facilities and services, the property is characterized by urban growth within the meaning of WAC 365-196-310(1)(c).

> *(5) Recommendations for meeting requirements.*
>
> * * *
>
> *"(iii) Identifying the location of any new lands added to the urban growth area. Lands should be included in the urban growth area in the following priority order:*
>
> *"(A) Existing incorporated areas;*

> *"(B) Land that is already characterized by urban growth and has adequate public facilities and services;*
>
> *"(C) Land already characterized by urban growth, but requiring additional public facilities and urban services; and*
>
> *"(D) Lands adjacent to the above, but not meeting those criteria."*

Response: As described above under WAC 365-196-310(1)(c), the property is surrounded by extensive residential development and is served by public facilities adequate to support urban-level development. A gravity-fed water main is immediately adjacent to the property, and the property is within the future Camas water service area, making water service readily extendable. The property is within the Camas School District, with three public schools located within two miles. Fire and emergency services are provided by East County Fire & Rescue Station 91, approximately 1.5 miles distant, and law enforcement services are provided by the Clark County Sheriff's Office. These existing and planned facilities are sufficient to serve the intensity of development contemplated for the property without requiring significant new infrastructure investment. The property therefore satisfies Priority Category (B).

To the extent any public facilities require extension or supplementation beyond existing infrastructure, the property independently satisfies Priority Category (C). The water main immediately adjacent to the property requires only connection rather than new main installation, and the property's location within the future Camas water service boundary confirms that supplemental service has been anticipated in the city's planning.

III. Ridgefield

The following analyses can be used to supplement the County's findings as it relates to the lands near the City of Ridgefield. Much of this information is already in the record.

A. Introduction

The proposed de-designation of the North Ridgefield Expansion Area (the property) is based on a comprehensive countywide analysis rather than solely on a parcel-by-parcel review. The Johnson Ridgefield Report (*see* Appendix "B") evaluates the property under the agricultural-resource-land designation criteria and provides countywide context concerning agricultural conditions, population growth, and housing development. The City of Ridgefield also included a letter into the record with additional, relevant information (*see* Appendix "C").

As demonstrated below, the property does not satisfy the statutory standard for agricultural land having long-term significance for commercial production.

B. Detailed Responses to Relevant Statutes

The Department of Commerce's letter cites to WAC 365-190-040(10). Analyses of and responses to that statutory provision are set forth below.

WAC 365-190-040(10) states in relevant part:

> "*(10) Designation amendment process.*
>
> > "*(a) Land use planning is a dynamic process. Natural resource lands review procedures should provide a rational and predictable basis for accommodating change.*

Response: The Johnson Ridgefield Report evaluates the property under the three agricultural-resource-land criteria and considers both site-specific conditions and broader trends in agriculture, urban growth, and land use in Clark County and Ridgefield. The report provides a rational basis for the proposed de-designation by systematically analyzing the property's characterization by urban growth, its current and potential agricultural use, and its lack of long-term commercial significance for agriculture.

The periodic comprehensive plan update process provides the procedural framework for reviewing and updating natural resource land designations on a predictable schedule. The proposed de-designation is part of that dynamic planning process and is based on rational application of the designation criteria to changed conditions.

> "*(b)*
>
> > *"(i) De-designations of natural resource lands can undermine the original designation process. De-designations threaten the viability of natural resource lands and associated industries through conversion to incompatible land uses, and through operational interference on adjacent lands. Cumulative impacts from*

> *de-designations can adversely affect the ability of natural resource-based industries to operate.*
>
> "*(ii) Counties and cities should maintain and enhance natural resource-based industries and discourage incompatible uses. Because of the significant amount of time needed to review natural resource lands and potential impacts from incompatible uses, frequent, piecemeal de-designations of resource lands should not be allowed. Site-specific proposals to de-designate natural resource lands must be deferred until a comprehensive countywide analysis is conducted.*

Response: The proposed de-designation is being considered as part of the periodic comprehensive plan update rather than as an isolated, piecemeal amendment. The Johnson Ridgefield Report addresses countywide agricultural conditions, including the decline in Clark County farmland acreage. The County contained slightly more than 1,900 farms and approximately 56,000 acres of land in farms, representing a 38 percent reduction in farm acreage since 2017. This is not due to re-zoning of agricultural land but to previously-used farmland falling out of production.

The property represents approximately 0.5 percent of Clark County's Current Use-designated agricultural land. The proposed de-designation will not materially undermine the viability of Clark County's agricultural industry or create operational interference with adjacent agricultural lands, as the property is characterized by urban growth including residential and commercial development.

> "*(c) Reviewing natural resource lands designation. In classifying, designating and de-designating natural resource lands, counties must conduct a comprehensive countywide analysis. Counties and cities should not review natural resource lands designations solely on a parcel-by-parcel basis. Designation amendments should be based on consistency with one or more of the following criteria:*

Response: The County's de-designation decision is not based solely on a parcel-by-parcel review. The Johnson Ridgefield Report evaluates the property under the agricultural-resource-land designation criteria and provides countywide context concerning agricultural trends, population growth, and housing development.

The proposed de-designation is based on consistency with the criteria, as set forth below.

> "*(i) A change in circumstances pertaining to the comprehensive plan or public policy related to designation criteria in WAC 365-190-050(3), 365-190-060(2), and 365-190-070(3);*

Response: WAC 365-190-060 is not applicable because it relates to forest resource lands, which are not at issue. WAC 365-190-070 is not applicable because it relates to mineral resource lands, which are also not at issue.

The record reflects changed circumstances in the comprehensive plan and public policy applicable to the property. The property adjoins the Ridgefield Urban Growth Area on three sides and carries an urban reserve and industrial overlay.

As documented in the City of Ridgefield's October 2024 letter, which is in the record, Ridgefield is projected to grow by more than 10,600 residents during the planning period and must plan for 5,815 new housing units and 8,175 new jobs. The City identified a capacity deficit of 2,652 homes affordable to households earning less than 80 percent of area median income within the existing urban growth area and has modeled the property for an employment designation with a mixed-use overlay, with capacity for up to 1,250 housing units and 959 jobs.

The Growth Management Act's housing planning requirements, the County's housing allocation policies, and the City of Camas's demonstrated housing needs constitute changes in circumstances pertaining to comprehensive planning and public policy. These changes are related to the designation criteria because they affect the property's proximity to urban growth areas, the intensity of nearby land uses, the history of development permits issued nearby, and land values under alternative uses—all factors identified in WAC 365-190-050(3)(c), findings for which are set forth below.

> "*(ii) A change in circumstances to the subject property, which is beyond the control of the landowner and is related to designation criteria in WAC 365-190-050(3), 365-190-060(2), and 365-190-070(3);*

Response: WAC 365-190-060 is not applicable because it relates to forest resource lands, which are not at issue. WAC 365-190-070 is not applicable because it relates to mineral resource lands, which are also not at issue.

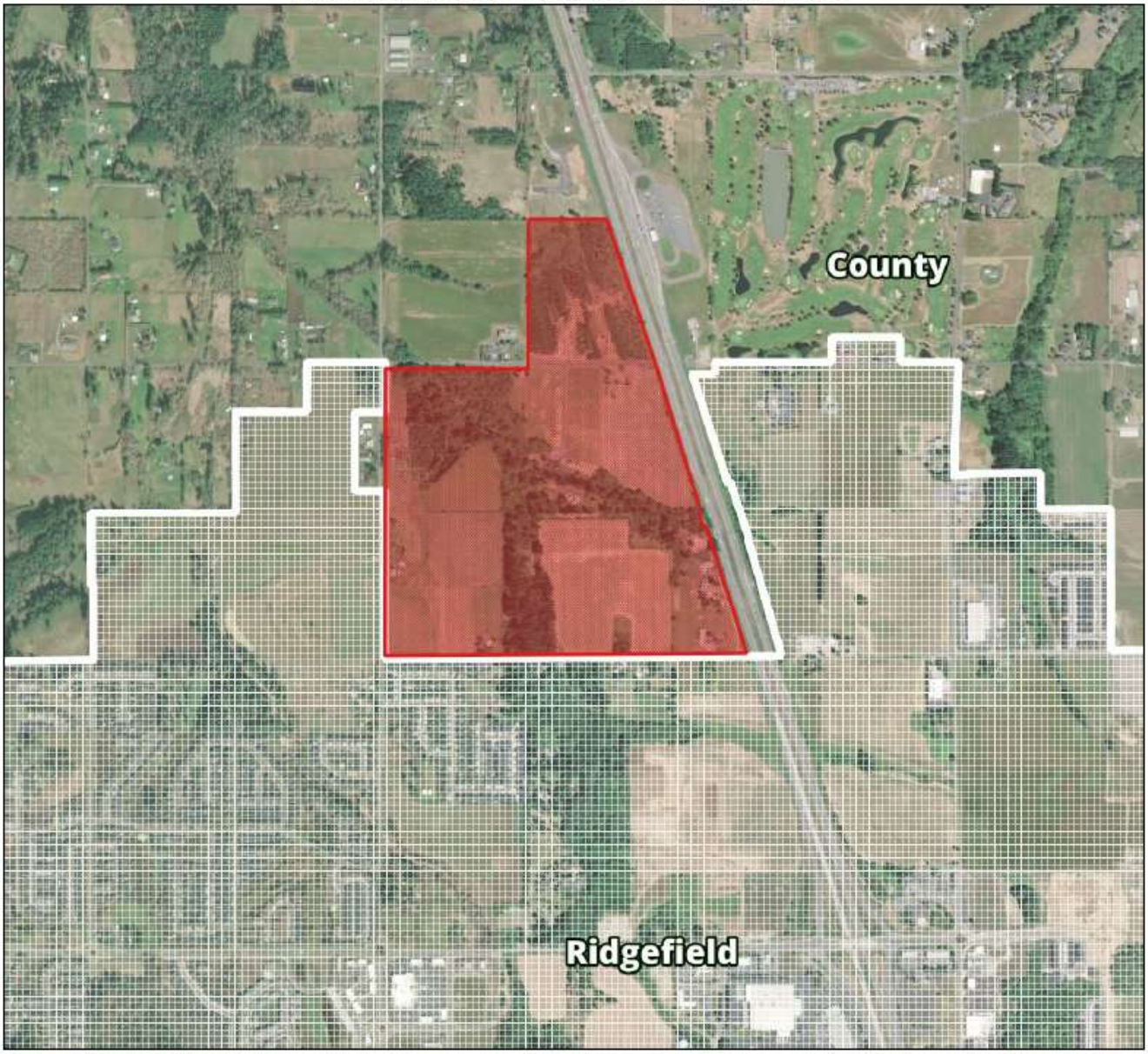
The Johnson Ridgefield Report documents multiple changes in circumstances to the property and surrounding area that are beyond the control of the landowner and are related to the designation criteria.

The property is now within one mile of seven residential projects totaling more than 1,200 homes, either recently completed, under construction, or in planning, including a 296-lot subdivision immediately southwest of the property. The report further documents that nearly 1.2 million square feet of commercial, industrial, and institutional development has been completed, is under construction, or is in permit review within a mile of the property. The new Costco is approximately 1,000 feet away. The Cowlitz Tribe's entertainment and commercial complex and associated development near the I-5 interchange have further transformed the area north of the property. It is a major tourist destination and is an intense urban use.

The surrounding development pattern reflects substantial changes in the settlement pattern and intensity of nearby land uses since the property was designated. The property is now adjacent to areas planned for continued urban expansion, and is situated between existing incorporated urban areas and areas already characterized by urban growth.

These external changes directly bear on whether the property is characterized by urban growth, the proximity and intensity of surrounding land uses, the settlement pattern in the area, the history of nearby development activity, and whether the property retains long-term commercial significance for agriculture or other resource use.

FIGURE 4.1: RIDGEFIELD URBAN GROWTH BOUNDARY, 2022

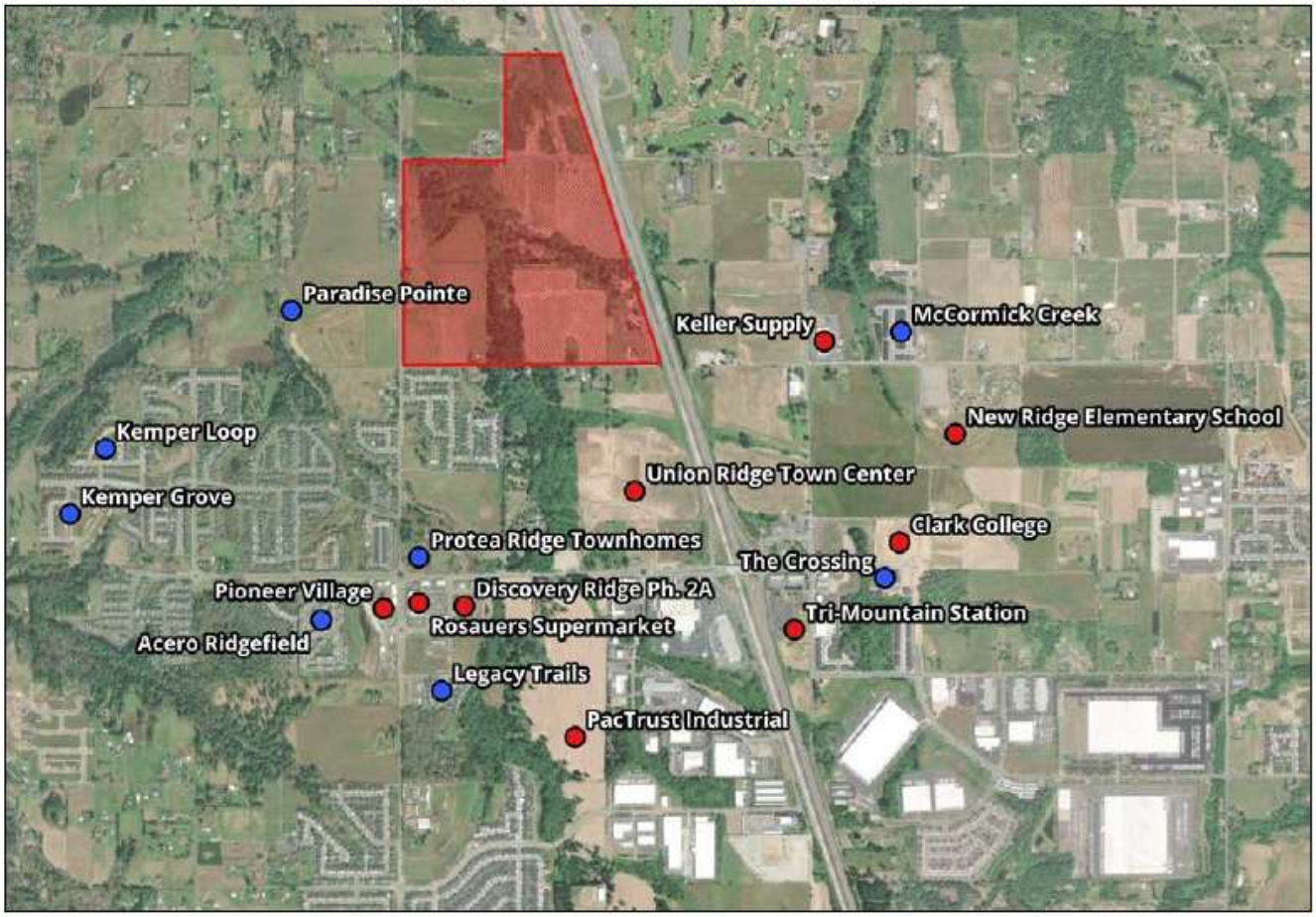


SOURCE: Clark County, JOHNSON ECONOMICS

"*(iii) An error in designation or failure to designate;*

Response: This criterion is not applicable. The proposed de-designation is based on changed circumstances and new information rather than on correction of an error.

FIGURE 4.3: NEW DEVELOPMENTS IN PROXIMITY, 2024



SOURCE: Clark County, JOHNSON ECONOMICS

> "*(iv) New information on natural resource land or critical area status related to the designation criteria in WAC 365-190-050(3), 365-190-060(2), and 365-190-070(3); or*

Response: WAC 365-190-060 is not applicable because it relates to forest resource lands, which are not at issue. WAC 365-190-070 is not applicable because it relates to mineral resource lands, which are also not at issue.

The Johnson Ridgefield Report provides new information on the agricultural status of the property related to the designation criteria in WAC 365-190-050(3).

The report documents that as of October 2024, only approximately 48 acres—25 percent of the property—were being farmed, exclusively for hay, and that this activity was conducted primarily to control vegetation and maintain Current Use tax eligibility rather than for commercial agricultural production.

The report evaluates soil classifications and finds most of the property consists of Gee silt loam at varying slopes (Class II, IV, and VII soils), with small areas of Odne silt loam (Class VI). The report concludes the most practical agricultural use is hay or livestock grazing.

The property holds five groundwater claims and two water right certificates authorizing 18 acres of irrigation and authorizing 52 acres. However, these water rights historically did not provide enough water to support crops beyond hay. A tree farm operated until around 2015 but failed due to lack of water.

The report evaluates the property's agricultural productivity potential and estimates maximum gross hay revenue of approximately $123,500 to $148,200 annually across all potentially usable acreage, before deducting labor, equipment, fertilizer, and transaction costs. The report's livestock analysis concludes that the available acreage would not support a profitable operation.

The report further documents that the assessed value of the developable parcels substantially exceeds any value supportable by anticipated agricultural income.

The property's limited extent of current agricultural use, hay revenue potential, livestock feasibility, and land values under alternative uses constitute new information on the property's agricultural resource land status and are directly related to the designation criteria in WAC 365-190-050(3)(b) (used or capable of being used for agricultural production) and WAC 365-190-050(3)(c) (long-term commercial significance for agriculture), as set forth below.

> "*(v) A change in population growth rates, or consumption rates, especially of mineral resources."*

Response: The Johnson Ridgefield Report documents substantial population growth in Clark County and Ridgefield. Since 2010, Clark County's population increased by approximately 25 percent, or more than 100,000 people, and Ridgefield's population increased by approximately 219 percent, or more than 10,000 people. The City of Ridgefield's October 2024 letter adds updated projections for the planning period, including a projected increase of more than 10,600 residents and corresponding housing and employment needs.

Recent housing construction/consumption in Clark County has roughly been on par with the 1990s, when the County experienced a suburban boom, though the share of multifamily units has increased considerably while single-family construction is below the 1990s level. Since 2017, approximately 958 completed residential units have been permitted within one mile of the property, with an additional 308 units under construction or in planning.

The documented increase in population growth rates in Clark County and the City of Ridgefield, coupled with increased housing consumption and residential development, constitutes a change in population growth rates.

//

WAC 365-190-050 states in relevant part:

> "*(1) In classifying, designating and de-designating agricultural resource lands, counties must conduct a comprehensive countywide analysis consistent with WAC 365-190-040(10). Counties and cities should not review resource lands designations solely on a parcel-by-parcel basis. * * *.*
>
> * * *

Response: The criteria of WAC 365-190-040(10) are set forth above. The Johnson Ridgefield Report evaluated the property under the three agricultural-resource-land criteria and considered both site-specific conditions and broader countywide trends in agriculture, urban growth, and land use.

The proposed de-designation is not based solely a parcel-by-parcel analysis.

> *"(3) Lands should be considered for designation as agricultural resource lands based on three factors:*
>
> > *"(a) The land is not already characterized by urban growth. To evaluate this factor, counties and cities should use the criteria contained in WAC 365-196-310.*

Response: The relevant provisions of WAC 365-196-310 are addressed below. WAC 365-196-310 recognizes that territory outside a city may be included within an urban growth area when it is already characterized by urban growth or is adjacent to territory already characterized by urban growth.

The property adjoins the Ridgefield Urban Growth Area on the west, east, and south, and carries an urban reserve and industrial overlay. Land inside the adjacent urban growth boundary is primarily designated or developed for residential, commercial, employment, industrial, park, or open-space uses.

Within approximately one mile, recent and pending residential development totals more than 1,200 units. Nearly 1.2 million square feet of commercial, industrial, and institutional development has been completed, is under construction, or is in permit review in the surrounding area.

The property is adjacent to the City of Ridgefield's wastewater service area and is served by Clark Public Utilities for electricity and the City of Ridgefield for water. Fire protection, law enforcement, health care, and schools are available in the surrounding area.

The determination that the property is characterized by urban growth rests on this documented pattern of existing development, planned land uses, and available infrastructure and public services.

> > *"(b) The land is used or capable of being used for agricultural production. This factor evaluates whether lands are well suited to agricultural use based primarily on their physical and geographic characteristics. Some agricultural operations are less dependent on soil quality than others, including some livestock production operations.*

Response: While portions of the property are physically capable of supporting limited agricultural use,

the overall site is not well suited to agricultural production. The Johnson Ridgefield Report identifies hay production and livestock grazing as the most practical agricultural uses given soil and water constraints.

As of October 2024, only approximately 48 acres—25 percent of the property—were in active hay production, and that activity was conducted primarily to control vegetation and maintain Current Use tax status rather than as a commercial operation. The remaining parcels comprising 75 percent of the property are not being farmed and consist of weeds, grass, and trees unsuitable for haying.

The report evaluates the property's soil classifications under the USDA Natural Resources Conservation Service land-capability classification system and finds that most of the property consists of Gee silt loam at varying slopes, classified as Class II, IV, and VII soils. The land around Allen Creek includes GeE (Class IV, suitable for some crops) and GeF (Class VII, not suitable for any crops except grazing in some circumstances). Small areas of Odne silt loam (OdB), classified as Class VI and generally not suitable for crops, are also present. The report concludes that the most practical agricultural use is hay or livestock grazing.

The property holds five groundwater claims and two appurtenant water right certificates: 18 acres of primary irrigation at 0.07 cubic feet per second, up to 13 acre-feet per year, and 52 acres of irrigation at 32 gallons per minute, up to 26 acre-feet per year. However, the report documents that historically these water rights did not provide enough water access to support any crops beyond hay. One parcel previously operated as a tree farm until around 2015, but most of the trees died due to lack of available water when tree farming was attempted again after a 2016 sale.

The report estimates maximum gross hay revenue of approximately $123,500 to $148,200 annually across all potentially usable acreage (approximately 95 usable acres), before deducting labor, equipment, fertilizer, and transaction costs. The report's livestock analysis concludes that the available acreage could support up to 47 cow-calf pairs, but that an operation of this scale would operate at a loss based on USDA budget assumptions estimating a net value per calf sold at a loss of $359.

Portions of the property are physically capable of limited hay, pasture, or livestock use. That limited capability does not, by itself, establish that the property constitutes agricultural resource land of long-term commercial significance. When the property's physical limitations are considered with its lack of sufficient irrigation rights for crops beyond hay, absence of agricultural infrastructure, limited productive acreage of approximately 95 usable acres out of 199.1 total acres, and surrounding development pattern characterized by new residential subdivisions and commercial projects, the record demonstrates that its agricultural capability is restricted to low-intensity uses that are not commercially sustainable at this location.

These factors weigh in favor of a finding that the land is not well suited to agricultural use.

> *(i) Lands that are currently used for agricultural production and lands that are capable of such use must be evaluated for designation. The intent of a landowner to use land for agriculture or to cease such use is not the controlling factor in determining if land is used or capable of being used for agricultural production. Land enrolled in federal conservation reserve programs is recommended for designation based on previous agricultural use, management requirements, and*

potential for reuse as agricultural land.

Response: Only approximately 48 acres were in active hay production as of October 2024, and most of the property was not being farmed.

While the landowner's intent is not controlling, the extent and character of existing agricultural activity are relevant evidence when considered with the property's physical and economic conditions. The Johnson Ridgefield Report examines objective evidence concerning soils, water rights, current use, productive acreage, and the economics of reasonably available agricultural uses.

The Johnson Ridgefield Report concludes that even if all potentially usable acreage were placed into hay production, the expected economic returns would not support a commercially viable agricultural operation.

No portion of the property is enrolled in a federal conservation reserve program. That means this sub-factor does not weigh in favor of keeping the agricultural resource designation.

Based on the objective evidence, rather than the owners' stated intentions, the property is only partially devoted to agricultural use, and its potential agricultural uses are too limited to establish long-term commercial significance.

> *(ii) In determining whether lands are used or capable of being used for agricultural production, counties and cities shall use the land-capability classification system of the United States Department of Agriculture Natural Resources Conservation Service as defined in relevant Field Office Technical Guides. These eight classes are incorporated by the United States Department of Agriculture into map units described in published soil surveys, and are based on the growing capacity, productivity and soil composition of the land.*

Response: The Johnson Ridgefield Report applies the USDA Natural Resources Conservation Service land-capability classification system in evaluating the property. The report identifies a mixture of Class II, IV, VI, and VII soils across the property. While Class II soils have moderate limitations and Class IV soils have severe limitations that restrict the range of plants or require special conservation practices, Class VI and VII soils have very severe or extremely severe limitations that make them generally unsuitable for cultivation. The soil mix reflects the property's limited overall suitability for productive agricultural use, with hay production and livestock grazing identified as the most feasible uses given the soil composition and growing capacity of the land.

> *(c) The land has long-term commercial significance for agriculture. In determining this factor, counties and cities should consider the following nonexclusive criteria, as applicable:*

Response: The property lacks long-term commercial significance for agriculture. The record reflects limited soil capability, constrained water availability, minimal and economically marginal current agricultural use, high alternative-use values, proximity to the urban growth boundary, and an increasingly urban surrounding land-use pattern.

(i) The classification of prime and unique farmland soils, and farmlands of statewide importance, as mapped by the Natural Resources Conservation Service;

Response: The Johnson Ridgefield Report identifies the soil types present on the property using USDA Natural Resources Conservation Service data. The property contains a mixture of Class II, IV, VI, and VII soils. The report's soil analysis does not identify the property as consisting predominantly of prime farmland soils, and the physical and geographic characteristics of the soils support only limited agricultural uses, primarily hay production and livestock grazing.

The Clark County Agricultural Lands Study (2025) indicates that the property has a mix of prime farmland, farmlands of statewide importance, and also soil that is neither prime farmland or of statewide importance. A copy of that map is on the next page, along with a more detailed view. Importantly, the other lands that could be included in the City of Ridgefield Urban Growth Area are similarly situated as mixtures of prime, farmlands of statewide importance, and soils of neither classification. This makes the de-designation of this property as having no greater impact than the de-designation of other potential lands.

(ii) The availability of public facilities, including roads used in transporting agricultural products;

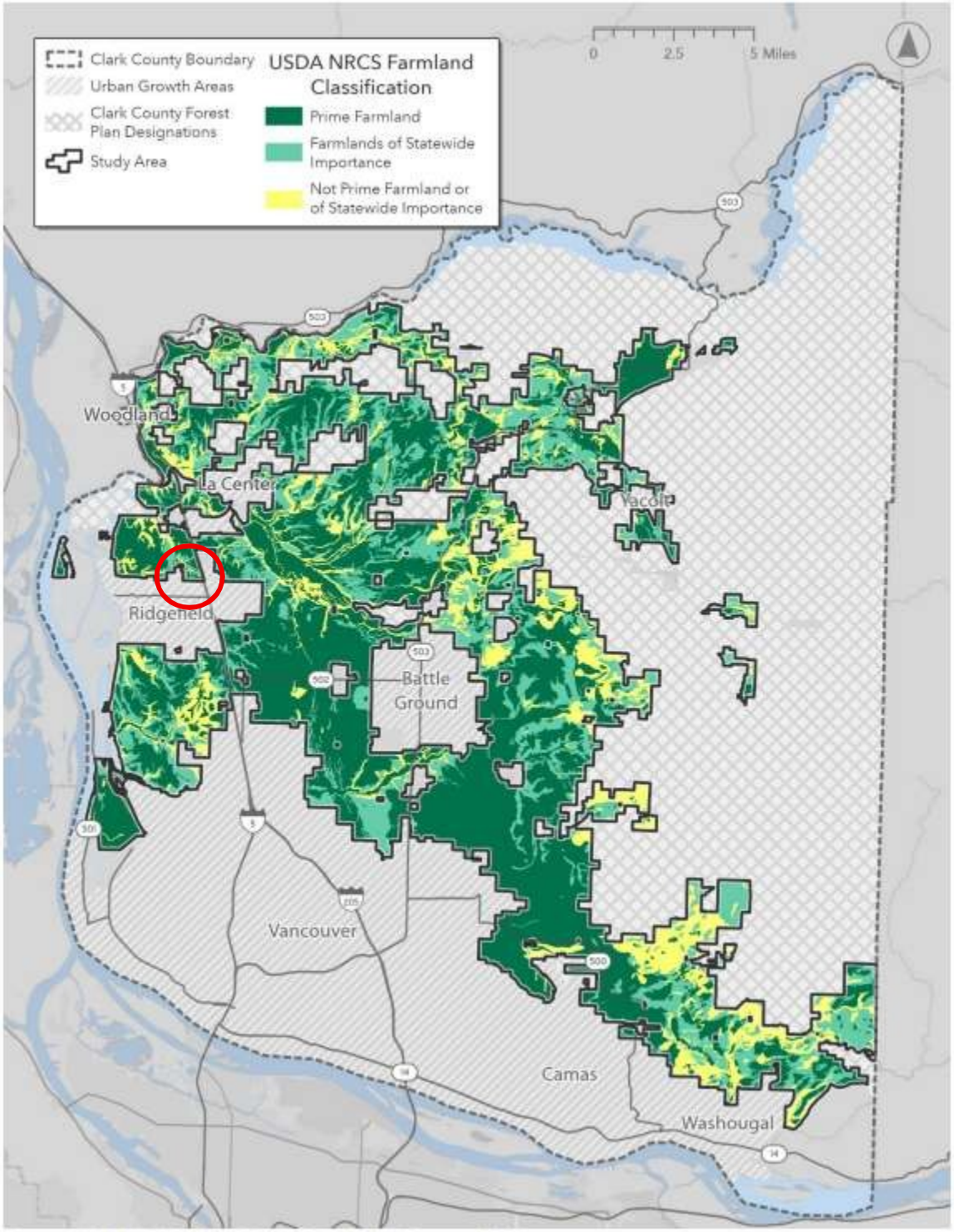
Response: North Royle Road provides access along the west side of the property. It has two travel lanes, no bike lanes or sidewalks, posted speeds of 40 miles per hour along the property and 35 miles per hour farther south within the City of Ridgefield, and stop-sign-controlled intersections at North 10th Street and Northwest 289th Street. The property is also approximately 1.3 miles by driving distance from the nearest I-5 on-ramp. These roads provide physical access to the property, but the surrounding transportation network increasingly serves residential, commercial, educational, and industrial development rather than a predominantly agricultural transportation corridor.

The property is currently within the Rural/Resource Sewer District and outside the City of Ridgefield's utility service areas, but it is adjacent to the City's wastewater service area on the south and west boundaries. The Johnson Ridgefield Report indicates that access to City wastewater service would be readily available if the property were annexed into the Ridgefield UGA. Electricity is provided by Clark Public Utilities, water service is provided by the City of Ridgefield, and Clark Public Utilities recently updated adjacent power and wastewater lines.

The property is also near urban public services, including fire, police, medical, urgent care, and school facilities. Those services, together with nearby utility-service boundaries and surrounding residential, commercial, and industrial uses, reflect the property's relationship to Ridgefield's urbanizing area.

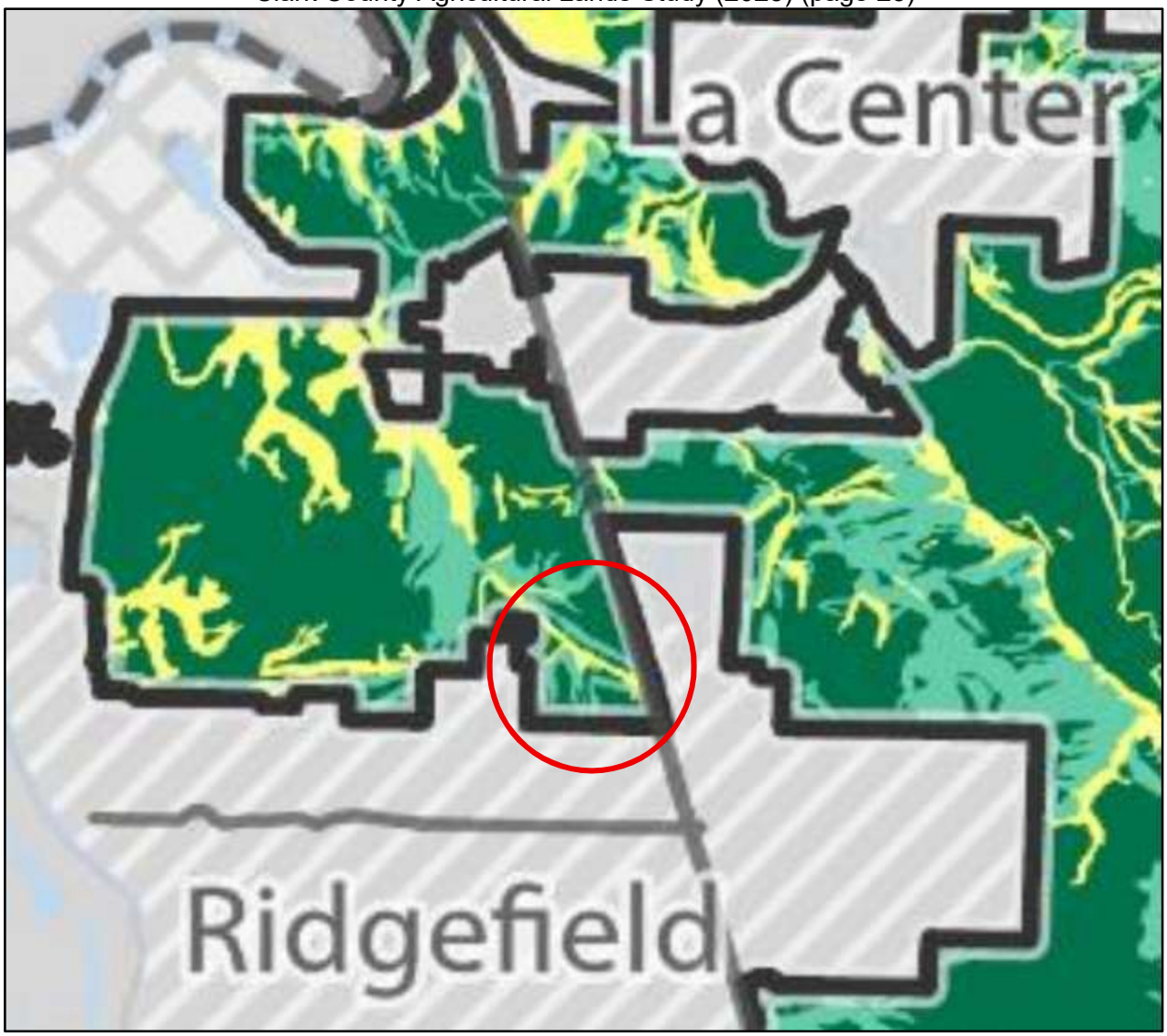
On balance, existing road access permits agricultural entry to the property, but the road network and nearby public facilities are increasingly oriented toward urban development. Utility-service proximity likewise reflects the property's adjacency to the City of Ridgefield and its urban growth pattern, not a durable agricultural production area. This factor therefore does not establish long-term commercial significance for agriculture.

Clark County Agricultural Lands Study (2025) (page 23)



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

Clark County Agricultural Lands Study (2025) (page 23)



(iii) Tax status, including whether lands are enrolled under the current use tax assessment under chapter 84.34 RCW and whether the optional public benefit rating system is used locally, and whether there is the ability to purchase or transfer land development rights;

Response: Portions of the property are enrolled in Current Use taxation. However, the Johnson Ridgefield Report notes that hay production on the property was undertaken primarily to maintain eligibility for Current Use taxation rather than as a commercially motivated agricultural enterprise. Current Use enrollment reflects a tax election and does not, by itself, establish long-term commercial significance for agriculture.

(iv) The availability of public services;

Response: The property is adjacent to the City of Ridgefield's wastewater service area along its south and west boundaries, and the report states that access to that service would be readily available following inclusion within the urban growth area and annexation. Electricity is provided by Clark Public Utilities, and water service is provided by the City of Ridgefield. Fire protection, law enforcement, health care, and schools are available within the surrounding area. The availability of these public services supports the conclusion that the property is situated in an area transitioning to urban use rather than one with long-term agricultural viability.

(v) Relationship or proximity to urban growth areas;

Response: Proximity to the urban growth area is a significant factor weighing against continued agricultural designation. The property adjoins the Ridgefield Urban Growth Area on the west, east, and south. Land inside the adjacent urban growth boundary is primarily designated or developed for residential, commercial, employment, and industrial uses. The Property itself carries an urban reserve and industrial overlay. The City of Ridgefield's October 2024 letter, which is in the record, further explains that the property is expected to be incorporated into the urban growth area to help accommodate projected housing and employment needs during the planning period.

(vi) Predominant parcel size, which may include smaller parcels if contiguous with other agricultural resource lands;

Response: The property consists of 16 parcels totaling approximately 199 acres. While the aggregate acreage could theoretically support certain agricultural uses, the report concludes that parcel configuration, ownership patterns, and surrounding urban development do not support viable long-term commercial agricultural use. The parcels are not situated contiguously with other actively farmed agricultural resource lands, and the surrounding land-use pattern does not reinforce a working agricultural landscape. The predominant parcel pattern weighs against long-term commercial agricultural significance.

(vii) Land use settlement patterns and their compatibility with agricultural practices;

Response: The prevailing land-use settlement pattern surrounding the property on three sides is residential, commercial, and industrial. Continued livestock use on the property could create mud, odor, and nuisance conflicts with nearby residential and commercial development. The surrounding settlement pattern is incompatible with the continuation of commercially significant agricultural practices on the property.

(viii) Intensity of nearby land uses;

Response: Within approximately one mile of the property, recent and pending residential development totals more than 1,200 units, including a 296-lot subdivision under construction immediately southwest of the property. Nearly 1.2 million square feet of commercial, industrial, and institutional development has been completed, is under construction, or is in permit review in the surrounding area. The Cowlitz

Tribe's entertainment and commercial complex and associated development near the I-5 interchange further reflect the intensity of nearby non-agricultural uses.

The intensity and trajectory of nearby residential development are inconsistent with the property's long-term use as part of a commercially significant agricultural land base. This factor supports de-designation.

(ix) History of land development permits issued nearby;

Response: Since 2017, permits within one mile of the property have resulted in 958 completed residential units, with another 308 units under construction or in planning. Substantial commercial, industrial, educational, and public-facility permits have also been issued in the surrounding area. This permit history reflects a sustained and ongoing pattern of urban development proximate to the property.

(x) Land values under alternative uses; and

Response: Parcels in Current Use are taxed at values far below their assessed market values. Five parcels designated fully as Open Space or Farm and Agriculture have assessed market values of approximately $355,500 to $601,800, while their taxable Current Use values range from approximately $1,759 to $7,506. Six additional parcels are partially designated under Current Use or include buildings taxed at full assessed value, with taxable values averaging approximately 40 percent of assessed value.

The assessed values reflect development value and are far higher than what a farmer would reasonably pay for agricultural production. Assessed values increased by approximately 35 to 100 percent from 2018 to 2024, and the total assessed value of land and buildings in the parcels is approximately $9.75 million. That market value substantially exceeds what could be supported by hay production or livestock operations, making acquisition or continued retention of the property for commercial agriculture economically impracticable. This factor strongly weighs against a finding of long-term commercial significance for agriculture.

(xi) Proximity to markets.

Response: The Johnson Ridgefield Report identifies potential local markets for limited hay sales in rural areas of the County to farmers with small numbers of animals. Larger quantities could potentially be marketed farther away, including into the Willamette Valley, but the report indicates this is less likely for the property. Commercial cattle-slaughter facilities are more distant and fewer in number.

Proximity to potential consumers does not overcome the property's limited viable agricultural uses, constrained water availability, limited productive acreage, required operating costs, high land value, and the projected unprofitability of livestock operations. The available markets are insufficient to make the agricultural uses reasonably available to the property commercially sustainable. This factor does not establish long-term commercial significance.

//

WAC 365-196-310 states in relevant parts:

> "*(1) Requirements.*
>
> * * *
>
> *"(c) An urban growth area may include territory that is located outside a city if such territory already is characterized by urban growth or is adjacent to territory already characterized by urban growth.*

Response: The property satisfies both prongs of WAC 365-196-310(1)(c): it is adjacent to territory already characterized by urban growth, and it is itself characterized by urban growth.

Adjacency to Urban Growth. The property is adjacent to the Ridgefield Urban Growth Boundary on its west, east, and south sides. Lands immediately inside those boundaries are primarily residential, commercial/employment, or parks/open space, and surrounding land to the west, east, and south is zoned for residential, commercial/business, and employment uses. The property is also zoned with an urban reserve and industrial overlay and has been tentatively planned for industrial use.

Characterized by Urban Growth. The Johnson Ridgefield Report documents substantial urban development around the property. Since 2018, nearly 1,000 new homes have been built within two miles, and within approximately one mile there are multiple completed, under-construction, or planned residential projects totaling more than 1,200 units, including Paradise Pointe immediately to the southwest. The surrounding area also includes significant commercial, industrial, and educational development, including Union Ridge Town Center, Pioneer Village, Clark College at Boschma Farms, industrial buildings, and other commercial projects totaling more than 1.17 million square feet completed, under construction, or in review.

Public facilities and services further confirm the property's urban context. North Royle Road provides direct access, the property is approximately 1.3 miles from I-5, and portions of North Royle Road are included in Ridgefield transportation planning. The property is adjacent to the City of Ridgefield wastewater service area on its south and west boundaries, water service is provided by the City of Ridgefield, and electricity is provided by Clark Public Utilities. Fire, police, medical, urgent care, and school facilities are all nearby, including Clark-Cowlitz Fire Rescue Station 21 about one mile away and a primary and urgent care clinic about one-half mile south of the property.

Ridgefield's growth reinforces the same conclusion. Ridgefield's population has increased by approximately 219 percent since 2010, and the report concludes that continued population growth will require additional residential and commercial land. Based on the property's direct adjacency to the Ridgefield Urban Growth Boundary, the intensity of nearby residential, commercial, industrial, and educational development, and the availability and proximity of urban public facilities and services, the property is characterized by urban growth.

> *(5) Recommendations for meeting requirements.*
>
> * * *

> *"(e) Determining the appropriate locations of new or expanded urban growth area boundaries. This process should consider the following:*
>
> > *"(iii) Identifying the location of any new lands added to the urban growth area. Lands should be included in the urban growth area in the following priority order:*
> >
> > > *"(A) Existing incorporated areas;*
> > >
> > > *"(B) Land that is already characterized by urban growth and has adequate public facilities and services;*
> > >
> > > *"(C) Land already characterized by urban growth, but requiring additional public facilities and urban services; and*
> > >
> > > *"(D) Lands adjacent to the above, but not meeting those criteria."*

Response: As described above under WAC 365-196-310(1)(c), the property is already characterized by urban growth and is served by public facilities and services adequate to support urban-level development. The property therefore satisfies Priority Category (B).

Existing and planned facilities support Priority Category (B). North Royle Road provides direct access, the property is approximately 1.3 miles from the nearest I-5 on-ramp, portions of North Royle Road are included in Ridgefield's transportation planning, the property is adjacent to the City of Ridgefield wastewater service area on its south and west boundaries, water service is provided by the City of Ridgefield, and electricity is provided by Clark Public Utilities. Fire, police, medical, urgent care, and school facilities are also nearby.

To the extent any public facilities require extension or supplementation, the property independently satisfies Priority Category (C). Any needed improvements would be incremental extensions of nearby urban systems, not the creation of a new service area for land lacking an urban context. The property therefore should be prioritized ahead of lands that are merely adjacent to urban growth but do not have comparable access to existing and planned public facilities and services.

IV. La Center

The following analyses can be used to supplement the County's findings as it relates to the lands near the City of La Center. Much of this information is already in the record.

A. Introduction

The proposed de-designation of the South La Center Expansion Area (the property) is based on a comprehensive countywide analysis rather than solely on a parcel-by-parcel review. The Johnson La Center Report (*see* Appendix "D") evaluates the property under the agricultural-resource-land designation criteria and provides countywide context concerning agricultural conditions, population growth, and housing development.

As demonstrated below, the property does not satisfy the statutory standard for agricultural land having long-term significance for commercial production.

B. Detailed Responses to Relevant Statutes

WAC 365-190-040(10) states in relevant part:

> "*(10) Designation amendment process.*
>
> > "*(a) Land use planning is a dynamic process. Natural resource lands review procedures should provide a rational and predictable basis for accommodating change.*

Response: The Johnson La Center Report evaluates the property under the three agricultural-resource-land criteria specified in WAC 365-190-050(3) and considers both site-specific conditions and broader trends in agriculture, urban growth, and land use in Clark County. The report provides a rational basis for the proposed de-designation by systematically analyzing the property's characterization by urban growth, its current and potential agricultural use, and its lack of long-term commercial significance for agriculture.

The County's periodic comprehensive plan update process provides the procedural framework for reviewing and updating natural resource land designations on a predictable schedule. The de-designation of the property is part of this dynamic planning process and is based on rational application of the designation criteria to changed conditions documented in the record.

> "*(b)*
>
> > *"(i) De-designations of natural resource lands can undermine the original designation process. De-designations threaten the viability of natural resource lands and associated industries through conversion to incompatible land uses, and through operational interference on adjacent lands. Cumulative impacts from de-designations can adversely affect the ability of natural resource-based industries to operate.*

> "*(ii) Counties and cities should maintain and enhance natural resource-based industries and discourage incompatible uses. Because of the significant amount of time needed to review natural resource lands and potential impacts from incompatible uses, frequent, piecemeal de-designations of resource lands should not be allowed. Site-specific proposals to de-designate natural resource lands must be deferred until a comprehensive countywide analysis is conducted.*

Response: The proposed de-designation does not constitute frequent or piecemeal removal of natural resource lands. The property represents approximately 0.05 percent of agricultural land and 0.2 percent of open space land classified under the Current Use program in Clark County. Most of the property has not been commercially farmed for at least 30 years, with only one 20-acre parcel currently operating as a horse boarding and training facility.

The Johnson La Center Report provides the countywide analysis, documenting agricultural conditions, population trends, development patterns, and the property's specific characteristics in the context of broader County trends. The report demonstrates that this de-designation will not undermine the viability of Clark County's agricultural industry or create operational interference with adjacent agricultural lands, as the property is not presently engaged in commercial agriculture and is surrounded by urban growth.

> "*(c) Reviewing natural resource lands designation. In classifying, designating and de-designating natural resource lands, counties must conduct a comprehensive countywide analysis. Counties and cities should not review natural resource lands designations solely on a parcel-by-parcel basis. Designation amendments should be based on consistency with one or more of the following criteria:*

Response: The County's de-designation decision is not based solely on a parcel-by-parcel review. The Johnson La Center Report evaluates the property under the agricultural-resource-land designation criteria and provides countywide context concerning agricultural trends, population growth, and housing development.

The proposed de-designation is based on consistency with the criteria, as set forth below.

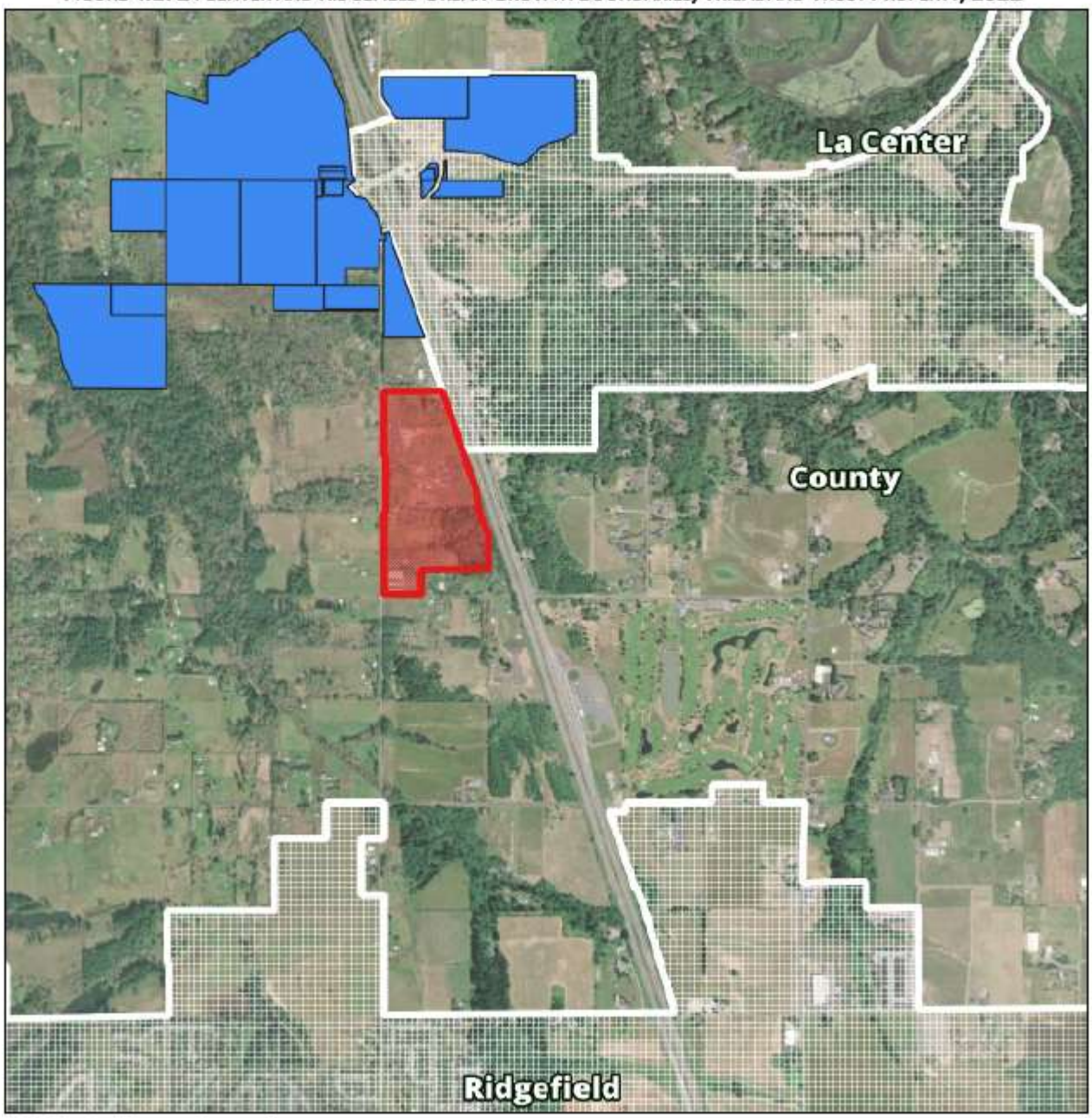
> "*(i) A change in circumstances pertaining to the comprehensive plan or public policy related to designation criteria in WAC 365-190-050(3), 365-190-060(2), and 365-190-070(3);*

Response: WAC 365-190-060 is not applicable because it relates to forest resource lands, which are not at issue. WAC 365-190-070 is not applicable because it relates to mineral resource lands, which are also not at issue.

There has been a substantial change in circumstances pertaining to comprehensive planning and public policy related to the agricultural designation criteria in WAC 365-190-050(3). Clark County's population has increased by almost 25 percent since 2010, and La Center's population has increased by approximately 39 percent over the same period, including almost 700 additional residents since 2019. Residential permitting in La Center also increased sharply after 2018, and over 800 residential units have been permitted in the city since 2010.

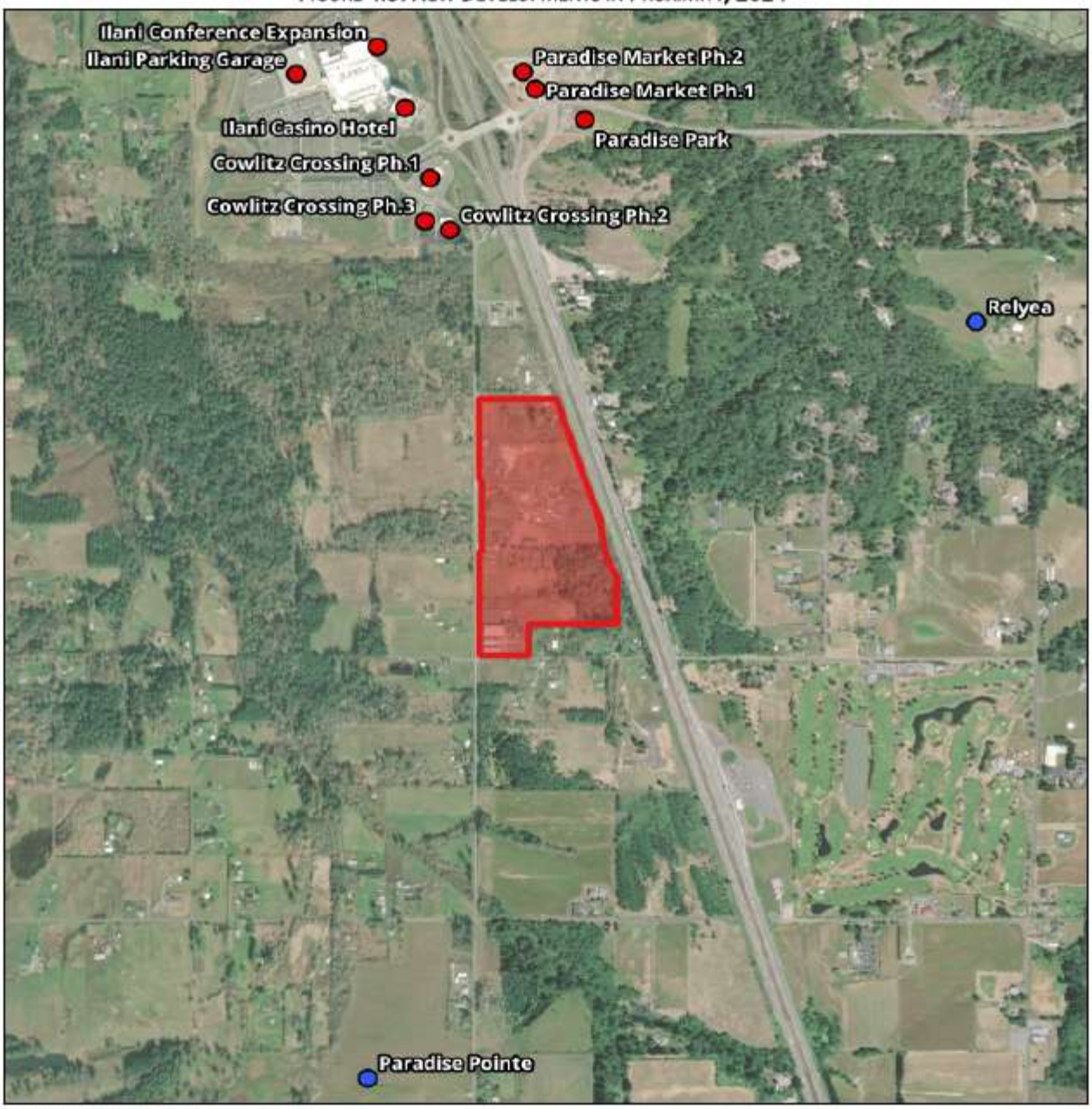
Assessed land values have increased by 75 to 180 percent from 2018 to 2024, reflecting development values inconsistent with long-term commercial agricultural use. These changed planning circumstances support amendment of the agricultural designation.

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



SOURCE: Clark County, JOHNSON ECONOMICS

FIGURE 4.3: NEW DEVELOPMENTS IN PROXIMITY, 2024



SOURCE: Clark County, JOHNSON ECONOMICS

> "*(ii) A change in circumstances to the subject property, which is beyond the control of the landowner and is related to designation criteria in WAC 365-190-050(3), 365-190-060(2), and 365-190-070(3);*

Response: WAC 365-190-060 is not applicable because it relates to forest resource lands, which are not at issue. WAC 365-190-070 is not applicable because it relates to mineral resource lands, which are also not at issue.

Circumstances affecting the property have changed independently of the landowners' control and are directly related to the agricultural designation criteria in WAC 365-190-050(3). The property adjoins the La Center Urban Growth Boundary, lies approximately one-half mile from the Ridgefield Urban Growth Boundary, and is near expanding tribal, residential, commercial, and mixed-use development. Within approximately one mile, more than 450 homes are under construction or proposed, and substantial commercial and lodging development has occurred near the I-5 interchange.

These changes are beyond the landowners' control and bear directly on the property's urban-growth context, proximity to urban growth areas, surrounding settlement pattern, intensity of nearby land uses, history of nearby development permits, and land values under alternative uses. They support de-designation.

> "*(iii) An error in designation or failure to designate;*

Response: This criterion is not applicable. The proposed de-designation is based on changed circumstances and new information rather than on correction of an error.

> "*(iv) New information on natural resource land or critical area status related to the designation criteria in WAC 365-190-050(3), 365-190-060(2), and 365-190-070(3); or*

Response: WAC 365-190-060 is not applicable because it relates to forest resource lands, which are not at issue. WAC 365-190-070 is not applicable because it relates to mineral resource lands, which are also not at issue.

The Johnson La Center Report supplies substantial new information bearing on the property's agricultural-resource status.

The record establishes that most of the property is not commercially farmed. The only parcel presently in agricultural use is the roughly 20-acre southernmost parcel, occupied by Emerson Equestrian, a horse boarding and training facility; the middle parcels are used for landscape and equipment storage, with only about one-quarter acre of non-commercial berries and grapes.

Portions of the property were hayed and grazed during the 1990s and early 2000s, and the southernmost parcel has been used for equestrian activity since at least 2009.

Applying the USDA Natural Resources Conservation Service land-capability classification system and the USDA Web Soil Survey, the analysis maps the site as a mix of soils: predominantly Sara silt loam

(SlB and SlD), with areas of Gee silt loam (GeB and GeD) and Puyallup fine sandy loam (PuA), which are Class II, III, and IV; areas of Cove silty clay loam (CvA), which is Class V; and a large central area of Odne silt loam (OdB), which is Class VI. The higher-class soils are suitable for some crops and pasture, while the Class V and VI soils are generally unsuitable for cultivated crops, so the site is best suited to hay, pasture, and grazing rather than higher-value production.

The property also lacks the water necessary for commercially significant crop production. It carries a single groundwater claim of record and one water-right certificate which authorizes irrigation of only 10 acres (together with year-round domestic use) at 50 gallons per minute, up to 21 acre-feet annually.

That 10 acres is a small fraction of the 57.9-acre property. Securing additional irrigation water would be a very difficult and expensive process. Consistent with these physical constraints, the economic analysis shows that the reasonably available agricultural uses are marginal: at hay yields at the low end of the statewide range, the approximately 27.5 usable hay acres (plus roughly 8 acres at the Emerson parcel) would generate at most about $35,750 to $42,900 in gross revenue per year—before equipment, fertilizer, labor, and transaction costs—and a pasture-grazing operation of the 14 to 18 cow-calf pairs the site could support would operate at a loss under the USDA budget assumptions examined.

Four of the seven parcels are enrolled in Clark County's Current Use program as agricultural or open-space land and are therefore taxed well below their assessed value; withdrawal from the program is estimated to trigger roughly $131,000 in back taxes and interest. At the same time, the total assessed fair-market value of the land alone (excluding all buildings) is nearly $2.5 million—far more than a farmer could reasonably pay to acquire the site for the limited hay, pasture, grazing, and equestrian uses it can support—which reflects development rather than agricultural value.

Taken together, the property's limited and largely non-commercial agricultural use, its USDA soil and land-capability classifications, its water-right and irrigation limitations, the low productivity and economic infeasibility of the available agricultural uses, its assessed value and Current Use tax status, and the surrounding pattern of urban and residential growth constitute new information concerning the property's agricultural-resource-land status that is directly related to the designation criteria in WAC 365-190-050(3)(b) (used or capable of being used for agricultural production) and WAC 365-190-050(3)(c) (long-term commercial significance for agriculture), as set forth below.

> "*(v) A change in population growth rates, or consumption rates, especially of mineral resources."*

Response: There has been substantial population growth in Clark County and La Center, accompanied by increased residential permitting and commercial development. Clark County added more than 100,000 residents after 2010, while La Center grew by approximately 39 percent and experienced sustained increases in residential development after 2018. These population and development trends affect the property's urban character, nearby land-use intensity, development pressure, and value for nonagricultural uses. This is a substantial change.

//

WAC 365-190-050 states in relevant part:

> "*(1) In classifying, designating and de-designating agricultural resource lands, counties must conduct a comprehensive countywide analysis consistent with WAC 365-190-040(10). Counties and cities should not review resource lands designations solely on a parcel-by-parcel basis. * * *.*
>
> * * *

Response: The criteria of WAC 365-190-040(10) are set forth above. The Johnson La Center Report evaluated the property under the three agricultural-resource-land criteria and considered both site-specific conditions and broader countywide trends in agriculture, urban growth, and land use.

The proposed de-designation is not based solely a parcel-by-parcel analysis.

> *"(3) Lands should be considered for designation as agricultural resource lands based on three factors:*
>
> > *"(a) The land is not already characterized by urban growth. To evaluate this factor, counties and cities should use the criteria contained in WAC 365-196-310.*

Response: The relevant provisions of WAC 365-196-310 are addressed below. WAC 365-196-310 recognizes that territory outside a city may be included within an urban growth area when it is already characterized by urban growth or is adjacent to territory already characterized by urban growth.

The property is adjacent to the La Center Urban Growth Boundary and approximately one-half mile from the Ridgefield Urban Growth Boundary. Land within these urban growth areas is zoned for residential use, while surrounding rural parcels commonly range from approximately one-half acre to six acres and contain single-family residences.

Within one mile of the property, more than 450 homes are under construction or in the planning process. Paradise Pointe in Ridgefield will add 296 homes, and Relyea Subdivision has been proposed with 160 homes. Residential development has occurred both within subdivisions and on individual rural parcels throughout the surrounding area.

Nearby commercial development also demonstrates the property's urban context. Over 1.3 million square feet of commercial and lodging space has been completed within one mile of the property since 2019, including the Ilani Casino parking garage, hotel, and conference expansion, and the Cowlitz Crossing commercial center. That development is a major tourist destination and intense urban use. An additional 58,000 square feet of commercial and lodging space is in land use review. The Cowlitz Tribe intends to continue commercial development on land less than 0.2 miles north of the property.

The property is in the Ridgefield School District and is approximately three miles from Union Ridge Elementary School, Ridgefield High School, and View Ridge Middle School, with a new elementary school under construction two miles southeast of the property. Emergency services are nearby, with

the Clark-Cowlitz Fire Rescue Station approximately 1.5 miles away and the La Center Police Department approximately 2.5 miles away.

Based on the property's immediate adjacency to two urban growth areas, surrounding residential and commercial development, nearby subdivision activity, proximity to public facilities and services, and the residential and commercial character of adjoining land, the property is characterized by urban growth.

> *"(b) The land is used or capable of being used for agricultural production. This factor evaluates whether lands are well suited to agricultural use based primarily on their physical and geographic characteristics. Some agricultural operations are less dependent on soil quality than others, including some livestock production operations.*

Response: Of the seven parcels totaling approximately 57.9 acres, only the 20-acre Emerson Equestrian parcel is presently in agricultural use as a horse boarding and training facility. The landscaping and equipment-storage parcels include approximately one-quarter acre of noncommercial berries and grapes; the remaining parcels are residential, open space, or otherwise not commercially farmed.

The property has some physical capacity for agricultural production, but that capacity is limited. Its soils are suitable mainly for hay and pasture, with portions generally unsuitable for crops. The property has confirmed irrigation rights for only 10 acres, and additional irrigation water would be difficult and expensive to obtain. Higher-value crops such as vegetables and berries would require better soils and more water than are available.

Accordingly, while portions of the property are capable of limited hay, pasture, grazing, or equestrian use, the land is not well suited to broader or commercially viable agricultural production. This factor weighs against continued designation as agricultural resource land.

> *(i) Lands that are currently used for agricultural production and lands that are capable of such use must be evaluated for designation. The intent of a landowner to use land for agriculture or to cease such use is not the controlling factor in determining if land is used or capable of being used for agricultural production. Land enrolled in federal conservation reserve programs is recommended for designation based on previous agricultural use, management requirements, and potential for reuse as agricultural land.*

Response: Of the seven parcels totaling approximately 57.9 acres, only the 20-acre Emerson Equestrian parcel is presently used for agricultural production as a horse boarding and training facility. The landscaping and equipment-storage parcels contain approximately one-quarter acre of noncommercial berries and grapes. The remaining parcels are residential or open space and are not in commercial agricultural production.

Most of the property has not been commercially farmed for several years. While the landowner's intent is not controlling, the cessation of agricultural operations is relevant evidence when considered with other factors.

The property's capability for agricultural use is limited. Soils are classified primarily as Class II, III, and IV, suitable mainly for hay and pasture rather than higher-value crop production, together with Class V and VI soils generally unsuitable for crops. Only 10 acres are authorized for irrigation under a water right certificate. Securing additional water rights would be very difficult and expensive due to surface water closures and the high likelihood that future groundwater withdrawals would affect closed surface waters.

Potential agricultural uses are restricted to hay production, pasture grazing, or equestrian activities. Maximum hay crop revenue is estimated at $35,750 to $42,900 yearly for approximately 27.5 usable acres, excluding costs for labor, equipment, land preparation, fertilizer, and transaction costs. Cattle production would operate at a loss under current conditions.

The lands are not enrolled in a federal conservation reserve program.

Based on evidence concerning historical production, present land conditions, soil capability, water availability, productive acreage, and agricultural economics, the property is not currently devoted to commercial agricultural production and its potential agricultural uses are too limited to establish long-term commercial significance.

> *(ii) In determining whether lands are used or capable of being used for agricultural production, counties and cities shall use the land-capability classification system of the United States Department of Agriculture Natural Resources Conservation Service as defined in relevant Field Office Technical Guides. These eight classes are incorporated by the United States Department of Agriculture into map units described in published soil surveys, and are based on the growing capacity, productivity and soil composition of the land.*

Response: The property has been evaluated using the United States Department of Agriculture Natural Resources Conservation Service land-capability classification system and mapped soil-survey units. Most of the central and western portions consist of Sara silt loam, with smaller areas of Gee silt loam and Puyallup fine sandy loam; these soils are Class II, III, and IV and are suitable for some crops and pasture. Portions of the north and south sides contain Cove silty clay loam, Class V, and a large central area contains Odne silt loam, Class VI; those soils are generally unsuitable for crops.

Although some soils are physically capable of agricultural use, the classifications show that the property is suited mainly to hay and pasture, not higher-value crop production. Higher-value crops such as vegetables and berries would require better soils and more water than are available, and only 10 acres of the approximately 57.9-acre property are clearly authorized for irrigation. The soil classifications therefore do not establish commercially sustainable agricultural capability.

> *(c) The land has long-term commercial significance for agriculture. In determining this factor, counties and cities should consider the following nonexclusive criteria, as applicable:*

(i) The classification of prime and unique farmland soils, and farmlands of statewide importance, as mapped by the Natural Resources Conservation Service;

Response: The property contains a mix of Natural Resources Conservation Service soil classifications. Most of the property area, particularly in the central and western portions, consists of Sara silt loam, with additional areas of Gee silt loam and Puyallup fine sandy loam; these soils are classified as Class II, III, and IV and are suitable for some crops and pasture. Portions of the north and south sides contain Cove silty clay loam, classified as Class V, and a large central area contains Odne silt loam, classified as Class VI; those soils are generally unsuitable for crops.

The Clark County Agricultural Lands Study (2025) indicates that the property is mostly prime farmland with some soil that is neither prime farmland or of statewide importance. A copy of that map is on the next page, along with a more detailed view. Overall, the mapped soils are suited primarily to hay and pasture rather than higher-value crop production. Because the property includes Class IV, V, and VI soils and has only 10 acres clearly authorized for irrigation, the soil classifications do not support a finding of long-term commercial significance for agriculture.

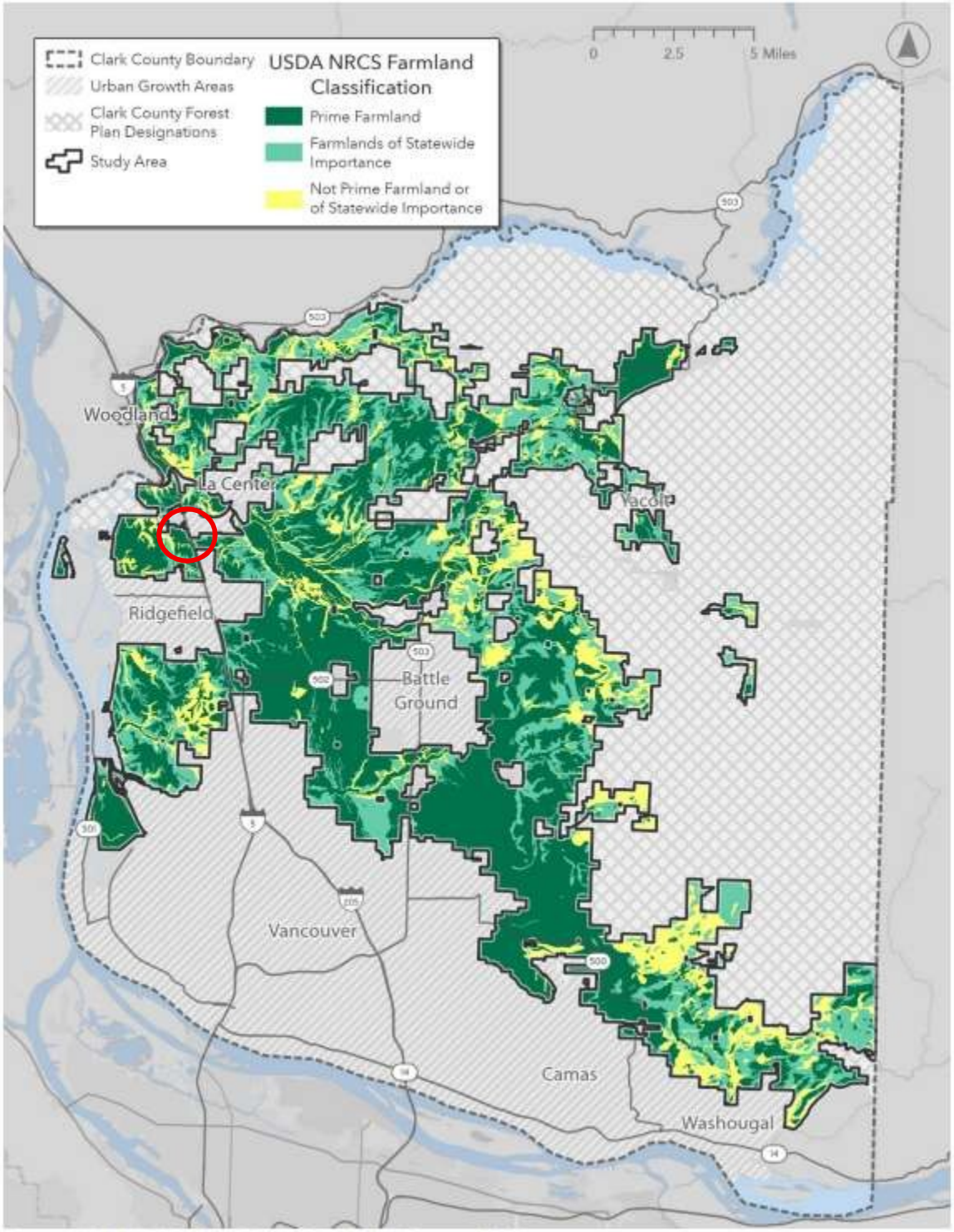
(ii) The availability of public facilities, including roads used in transporting agricultural products;

Response: Northwest 31st Avenue provides the property's primary road access. It has two travel lanes approximately 11 feet wide, separated by double yellow or broken yellow center lines, with no bike lanes or sidewalks. The posted speed limit is 40 miles per hour, and the nearest intersection is controlled with a stop sign. While the roads are physically capable of accommodating agricultural vehicles, the level of residential and commercial development on adjacent and surrounding lands means that intensive agricultural transport would conflict with the predominant residential and commercial uses in the area.

The property is in the Rural/Resource Sewer District, approximately 1.5 miles from the La Center Sewer District. Clark Public Utilities provides water service. The property is approximately 1.5 miles from Clark-Cowlitz Fire Rescue Station 21, approximately 2.5 miles from the La Center Police Department, and approximately nine miles from Legacy Salmon Creek Medical Center, the nearest hospital emergency department. The property is in the Ridgefield School District and is approximately three miles from Union Ridge Elementary School, Ridgefield High School, and View Ridge Middle School, with a new elementary school under construction two miles southeast of the property.

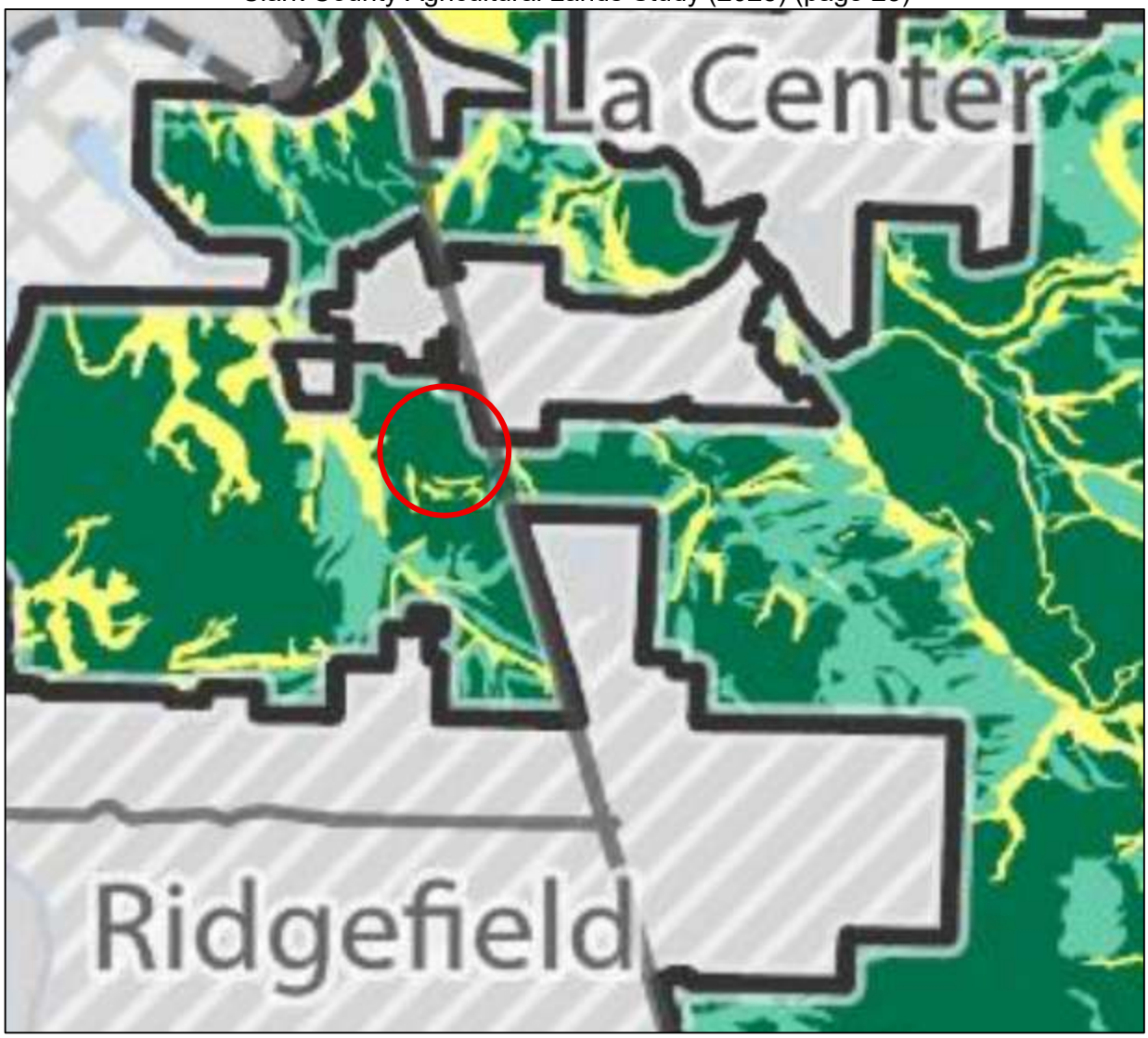
Public-facility availability is mixed. Existing road access permits entry but is not configured as a significant agricultural transportation corridor. Sewer service is not immediately available, though the property lies within the Rural/Resource Sewer District. Note, however, that the Cowlitz tribe will be extending sewer service to their lands pursuant to HB 1039 (2025). Water service is available through Clark Public Utilities. Nearby schools, fire, police, and medical services reflect the area's growing urban character rather than an agricultural setting. On balance, this factor does not establish long-term commercial significance for agriculture.

Clark County Agricultural Lands Study (2025) (page 23)



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

Clark County Agricultural Lands Study (2025) (page 23)



(iii) Tax status, including whether lands are enrolled under the current use tax assessment under chapter 84.34 RCW and whether the optional public benefit rating system is used locally, and whether there is the ability to purchase or transfer land development rights;

Response: Four of the seven parcels are designated under the Current Use program and have been enrolled since at least 2006. Withdrawal would result in approximately $131,000 in back taxes and interest. Most of the property has not been commercially farmed for many years, with only the 20-acre Emerson Equestrian parcel presently in agricultural use. Current-use enrollment does not establish actual commercial production or long-term commercial significance. Clark County does not have an optional public benefit rating system. This factor does not support continued designation.

(iv) The availability of public services;

Response: The property is approximately 1.5 miles from Clark-Cowlitz Fire Rescue Station 21, approximately 2.5 miles from the La Center Police Department, and approximately nine miles from Legacy Salmon Creek Medical Center, the nearest hospital emergency department. A primary and urgent care clinic is approximately two miles from the property. The property is in the Ridgefield School District and is approximately three miles from Union Ridge Elementary School, Ridgefield High School, and View Ridge Middle School. The district is constructing a new elementary school two miles from the property.

Fire protection, law enforcement, health care, and schools are available within the surrounding area. The availability of these public services supports the conclusion that the property is situated in an area transitioning to urban use rather than one with long-term agricultural viability.

(v) Relationship or proximity to urban growth areas;

Response: The property is adjacent to the La Center Urban Growth Boundary and approximately one-half mile from the Ridgefield Urban Growth Boundary. Land within these urban growth areas is zoned for residential use, while surrounding rural parcels commonly range from approximately one-half acre to six acres and contain single-family residences.

Within one mile of the property, more than 450 homes are under construction or in the planning process. Paradise Pointe in Ridgefield will add 296 homes, and Relyea Subdivision has been proposed with 160 homes. Over 1.3 million square feet of commercial and lodging space has been completed within one mile since 2019, including the Ilani Casino parking garage, hotel, and conference expansion, and the Cowlitz Crossing commercial center. An additional 58,000 square feet of commercial and lodging space is in land use review. The Cowlitz Tribe intends to continue commercial development on land less than 0.2 miles north of the property.

Proximity to the urban growth area is a significant factor weighing against continued agricultural designation. The property's location adjacent to La Center's boundary and near Ridgefield's boundary, combined with substantial surrounding residential and commercial development, demonstrates that the property is situated in an area transitioning to urban use rather than one with long-term agricultural viability.

(vi) Predominant parcel size, which may include smaller parcels if contiguous with other agricultural resource lands;

Response: The property consists of seven parcels totaling approximately 57.9 acres. The largest parcel is 20 acres and is used for a horse boarding and training facility. Two additional parcels used for landscaping and equipment storage are 6.7 and 10.9 acres. Three parcels designated as open space range from 2 to 10 acres, and one parcel with a home is 4 acres.

These parcels are substantially larger than residential parcels in nearby subdivisions, which range from 0.14 to 0.2 acres. However, the parcels are not situated contiguously with other actively farmed agricultural resource lands. Nearby agricultural uses are limited to a few small farms and several Current

Use-designated agricultural parcels that are no longer being farmed. The surrounding land-use pattern is characterized by expanding residential development.

While the aggregate acreage could theoretically support certain agricultural uses, parcel configuration, surrounding urban development, and the absence of contiguous actively farmed agricultural resource lands do not support viable long-term commercial agricultural use. The predominant parcel pattern weighs against long-term commercial agricultural significance.

(vii) Land use settlement patterns and their compatibility with agricultural practices;

Response: The prevailing land-use settlement pattern surrounding the property is characterized by expanding tribal, residential, commercial, and mixed-use development. The property adjoins the La Center Urban Growth Boundary and lies approximately one-half mile from the Ridgefield Urban Growth Boundary. Within one mile, more than 450 homes are under construction or proposed, including Paradise Pointe (296 homes) and Relyea Subdivision (160 homes). Over 1.3 million square feet of commercial and lodging space has been completed since 2019, including the Ilani Casino parking garage, hotel, conference expansion, and Cowlitz Crossing commercial center. The Cowlitz Tribe intends to continue commercial development on land less than 0.2 miles north of the property.

Nearby agricultural use is limited to a few small farms, including Northwood Stables, Greene Jungle Farm, Millennium Farms, and several Current Use-designated agricultural parcels that are no longer being farmed. Only one parcel at the property—the 20-acre Emerson Equestrian facility—is presently in agricultural use.

Continued commercial agricultural use on the property could create mud, odor, groundwater pollution, and nuisance conflicts with nearby residential and commercial development. The surrounding settlement pattern is incompatible with the continuation of commercially significant agricultural practices on the property.

(viii) Intensity of nearby land uses;

Response: Within approximately one mile of the property, more than 450 homes are under construction or in the planning process, including Paradise Pointe in Ridgefield (296 homes) and Relyea Subdivision (160 homes). Over 1.3 million square feet of commercial and lodging space has been completed within one mile since 2019, including the Ilani Casino parking garage, hotel, and conference expansion, and the Cowlitz Crossing commercial center. An additional 58,000 square feet of commercial and lodging space is in land use review. The Cowlitz Tribe intends to continue commercial development on land less than 0.2 miles north of the property.

The intensity and trajectory of nearby residential and commercial development are inconsistent with the property's long-term use as part of a commercially significant agricultural land base. This factor supports de-designation.

//

(ix) History of land development permits issued nearby;

Response: Since 2018, one subdivision permit has been issued within one mile of the property. Paradise Pointe in Ridgefield will add 296 new homes, and Relyea Subdivision has been proposed with 160 units. Nine commercial building permits have been issued since 2018, resulting in over 1.3 million square feet of completed commercial and lodging space. An additional 4,500 square feet remain under construction, and 58,000 square feet are in land use review.

This permit history reflects a sustained and ongoing pattern of urban development proximate to the property.

(x) Land values under alternative uses; and

Response: Four parcels are designated under the Current Use program and taxed at reduced values. These parcels have assessed market values of $120,000 to $1,400,000, while their taxable Current Use values range from $722 to $870,000. The three remaining parcels are taxed at their market values, which range from $400,000 to $1,120,000.

The assessed values reflect development value and are far higher than what a farmer would reasonably pay for agricultural production. Assessed land values increased by 75 to 180 percent from 2018 to 2024. The total assessed value of land and buildings in the parcels is approximately $2.5 million.

That market value substantially exceeds what could be supported by hay production or livestock operations. Maximum hay crop revenue is estimated at $35,750 to $42,900 yearly before costs, and cattle production would operate at a net loss of $359 per calf sold. The assessed market value of almost $2.5 million for land alone renders acquisition or continued retention of the property for commercial agriculture economically impracticable. This factor strongly weighs against a finding of long-term commercial significance for agriculture.

(xi) Proximity to markets.

Response: Potential local markets exist for limited hay sales in rural areas of the County to farmers with small numbers of animals. Larger quantities could potentially be marketed farther away, including into the Willamette Valley, but this is less likely for the property. Commercial cattle-slaughter facilities are more distant and fewer in number.

Proximity to potential consumers does not overcome the property's limited viable agricultural uses, constrained water availability, limited productive acreage, required operating costs, high land value, and the projected unprofitability of livestock operations. The available markets are insufficient to make the agricultural uses reasonably available to the property commercially sustainable. This factor does not establish long-term commercial significance.

//

//

WAC 365-196-310 states in relevant parts:

> "*(1) Requirements.*
>
> * * *
>
> *"(c) An urban growth area may include territory that is located outside a city if such territory already is characterized by urban growth or is adjacent to territory already characterized by urban growth.*

Response: The property satisfies both prongs of WAC 365-196-310(1)(c): it is adjacent to territory already characterized by urban growth, and it is itself characterized by urban growth.

Adjacency to Urban Growth. The property is adjacent to the La Center Urban Growth Boundary on its east side and approximately one-half mile from the Ridgefield Urban Growth Boundary to the south. Land within these urban growth areas is zoned primarily for residential use, while surrounding rural parcels commonly range from approximately one-half acre to six acres and contain single-family residences. To the northwest lies the Cowlitz Tribe reservation, which includes the Ilani Resort and Casino and associated commercial development. The freeway interchange on I-5 was reconstructed to accommodate increased traffic from the Ilani development. Immediately northeast of the property is the La Center Junction planning area, intended to promote commercial, employment, and residential mixed-use development.

Characterized by Urban Growth. Substantial urban development surrounds the property. Within one mile, more than 450 new homes are under construction or in the planning process. Paradise Pointe in Ridgefield will add 296 homes, and Relyea Subdivision has been proposed with 160 homes. Since 2019, over 1.3 million square feet of commercial and lodging space has been completed within one mile of the property. This includes Paradise Market, the Ilani Casino parking garage, hotel, and conference expansion, and Cowlitz Crossing commercial center. An additional 58,000 square feet of commercial and lodging space is in land use review. The Cowlitz Tribe intends to continue commercial development on land less than 0.2 miles north of the property.

Public facilities and services further confirm the property's urban context. Northwest 31st Avenue provides direct access with two 11-foot travel lanes and a posted speed limit of 40 miles per hour. The property is in the Ridgefield School District and is approximately three miles from Union Ridge Elementary School, Ridgefield High School, and View Ridge Middle School, with a new elementary school under construction two miles southeast of the property. Clark-Cowlitz Fire Rescue Station 21 is approximately 1.5 miles away, the La Center Police Department is approximately 2.5 miles away, and a primary and urgent care clinic is approximately two miles southeast of the property in Ridgefield. Water service is provided by Clark Public Utilities.

La Center's population growth reinforces the same conclusion. The city's population has increased by approximately 39 percent since 2010, with almost 700 additional residents since 2019 alone. Over 800 residential units have been permitted in La Center since 2010, with 650 being single-family homes.

Based on the property's direct adjacency to the La Center Urban Growth Boundary, its proximity to the Ridgefield Urban Growth Boundary, the intensity of nearby tribal, residential, commercial, and lodging

development, and the availability and proximity of urban public facilities and services, the property is characterized by urban growth.

(5) Recommendations for meeting requirements.

* * *

"(e) Determining the appropriate locations of new or expanded urban growth area boundaries. This process should consider the following:

"(iii) Identifying the location of any new lands added to the urban growth area. Lands should be included in the urban growth area in the following priority order:

"(A) Existing incorporated areas;

"(B) Land that is already characterized by urban growth and has adequate public facilities and services;

"(C) Land already characterized by urban growth, but requiring additional public facilities and urban services; and

"(D) Lands adjacent to the above, but not meeting those criteria."

Response: As described above under WAC 365-196-310(1)(c), the property is already characterized by urban growth and is served by public facilities and services adequate to support urban-level development. The property therefore satisfies Priority Category (B).

La Center's expansion options are constrained by surrounding agricultural designations, so the priority inquiry should focus on lands that already have an urban context rather than lands that are merely rural or agricultural in character. The property adjoins the La Center Urban Growth Boundary, is approximately one-half mile from the Ridgefield Urban Growth Boundary, and is near the Cowlitz Tribe reservation and Ilani development, the La Center Junction planning area, new residential subdivisions, and substantial commercial and lodging development near I-5.

Existing services and utilities further support Priority Category (B). The property has road access, water service through Clark Public Utilities, and nearby fire, police, medical, and school services.

To the extent any public facilities require extension or supplementation, the property independently satisfies Priority Category (C), because any needed improvements would be incremental extensions of nearby urban systems rather than creation of a new service area for land lacking an urban context. The property therefore should be prioritized ahead of lands that are merely adjacent to urban growth but do not have comparable access to existing and planned public facilities and services.

//

For the foregoing reasons, the properties should be de-designated from their current resource designations.

Please reach out with any questions.

Sincerely,

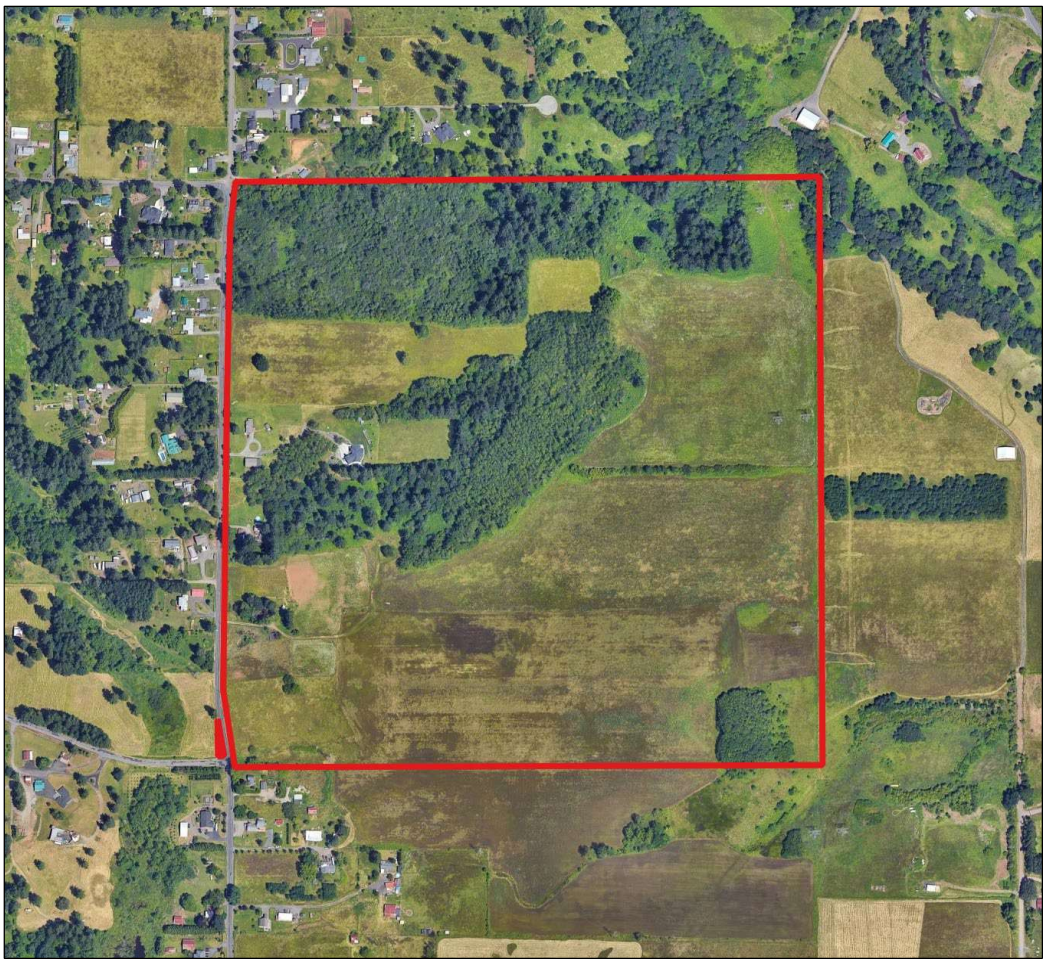
JORDAN RAMIS PC

/s/ Garrett West

Garrett K West

Appendix "A"

JOHNSON ECONOMICS



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

PREPARED FOR
JORDAN RAMIS
MAY 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 2
IV. CHARACTERIZATION OF URBAN GROWTH 5
V. CURRENT AGRICULTURAL PRODUCTION 8
VI. COMMERCIAL SIGNIFICANCE FOR AGRICULTURE 9
LAND CAPABILITY CLASSIFICATION 9
AVAILABILITY OF PUBLIC FACILITIES 10
TAX STATUS 11
AVAILABILITY OF PUBLIC SERVICES 12
PROXIMITY TO URBAN GROWTH AREAS 12
PARCEL SIZE 12
LAND USE PATTERNS & INTENSITY OF SURROUNDING LAND USE 12
HISTORY OF PERMITS ISSUED NEARBY 12
LAND VALUES UNDER ALTERNATIVE USES 13
PROXIMITY OF MARKETS 13
HAY/LIVESTOCK PRODUCTIVITY 13
VII. WATER RIGHTS 14
VIII. THE STATE OF AGRICULTURE IN CLARK COUNTY 14
IX. RECOMMENDATIONS 19

I. INTRODUCTION

JOHNSON ECONOMICS was retained by JORDAN RAMIS 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 is close to the Camas and Washougal urban growth areas, and almost 800 new homes have been built within two miles of the property since 2013. Zoning and land use around the property is primarily residential or rural, with minimal agricultural use.

The availability of public facilities and services is mixed at the subject property. It is within the future service area of the Camas Water District, with a gravity link immediately adjacent. There is good access to schools and emergency services, while the nearest hospital is about 11 miles away.

The soils on the subject property are within a range of classifications and are most suited for growing hay, grasses, or grains, or pasture use. However, the productivity of each of these operations is below a profitable level. The property does not have existing infrastructure to support farming, including appropriate water access.

The property is designated as agricultural land under the Current Use program, a tax deferment that reduces the taxable value of each parcel. However, the property no longer meets the criteria for this designation and will be subject to almost $600,000 in back taxes upon removal from the program. In addition, the total assessed market value of the parcels is over $5 million, rendering them infeasible to purchase except for residential use.

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.

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 18 parcels that total 161.2 acres. Each parcel has been assigned a number, which we will use to refer to the parcels throughout this report. The parcels are mapped with their assigned numbers below, and each corresponding parcel ID is listed in the table below. Single-family homes are on two of these parcels (178668000 and 178626000).

FIGURE 3.1: PARCELS CONTAINED IN THE SUBJECT PROPERTY



Assigned #	Parcel ID	Lot Size (acres)
1	178613000	5
2	178657000	5
3	178658000	5
4	178659000	5
5	178660000	5
6	178661000	5
7	178662000	5
8	178663000	5
9	178664000	5
10	178665000	5
11	178666000	5
12	178667000	5
13	178668000	5
14	178669000	5
15	178670000	5
16	178671000	5
17	178626000	2
18	178614000	79.2

SOURCE: Clark County, Jordan Ramis, JOHNSON ECONOMICS

PROPERTY BACKGROUND

The sixteen 5-acre parcels have been owned by Robert Nevin since at least 1999. The 79-acre parcel is owned by Robert Minturn and parcel 17 has been owned by the homeowners since 2016.

Parcels 13 and 17 contain occupied single-family dwellings. The home and small second building on parcel 17 were built in 1948. On parcel 13, the first home and second building were built 2009-2011, and the larger, new home was built in 2019. These homes are expected to remain if a change in use of the subject property occurs.

FIGURE 3.2: SATELLITE IMAGE OF OCCUPIED HOMES ON PARCELS 13 & 17



SOURCE: Google Earth, JOHNSON ECONOMICS

Parcel 18 contains a non-occupied single-family dwelling that received a notice of septic system critical deficiency in 2017. The picture below was taken in the same year. We consider the value of the building inconsequential to this analysis.

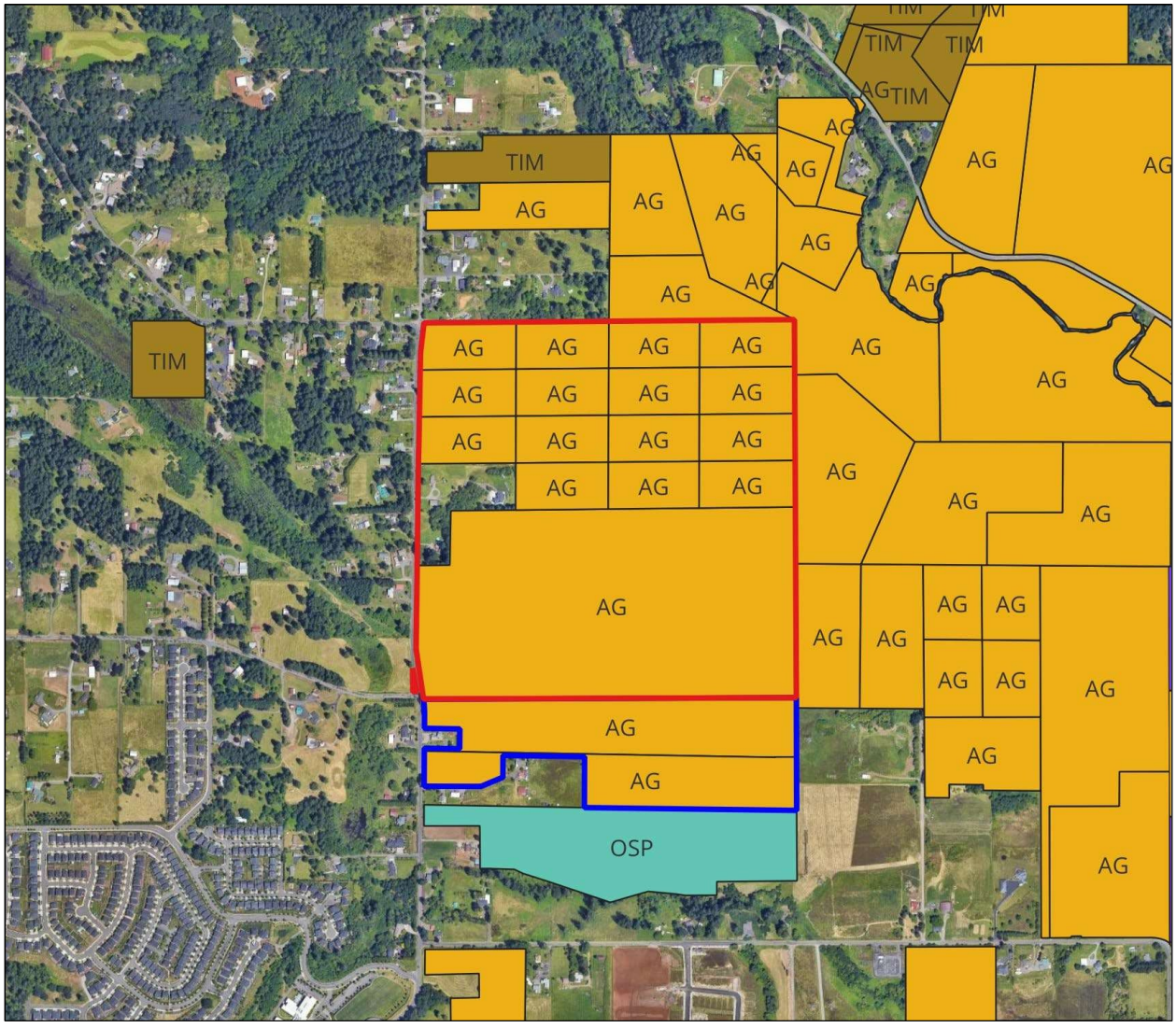
FIGURE 3.3: NON-OCCUPIED SINGLE-FAMILY DWELLING ON PARCEL 18



SOURCE: Clark County, JOHNSON ECONOMICS

Sixteen out of the 18 parcels within the subject property, excluding the parcels with occupied homes, are within the Current Use program and have been since at least 2006, according to the Clark County Assessor. 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. The following map shows the subject property and its Current Use designation of agricultural lands, as well as Current Use designations of the surrounding areas, which are primarily agricultural as well.

FIGURE 3.4: CURRENT USE DESIGNATIONS, SUBJECT AND SURROUNDING PROPERTIES



SOURCE: Clark County, JOHNSON ECONOMICS

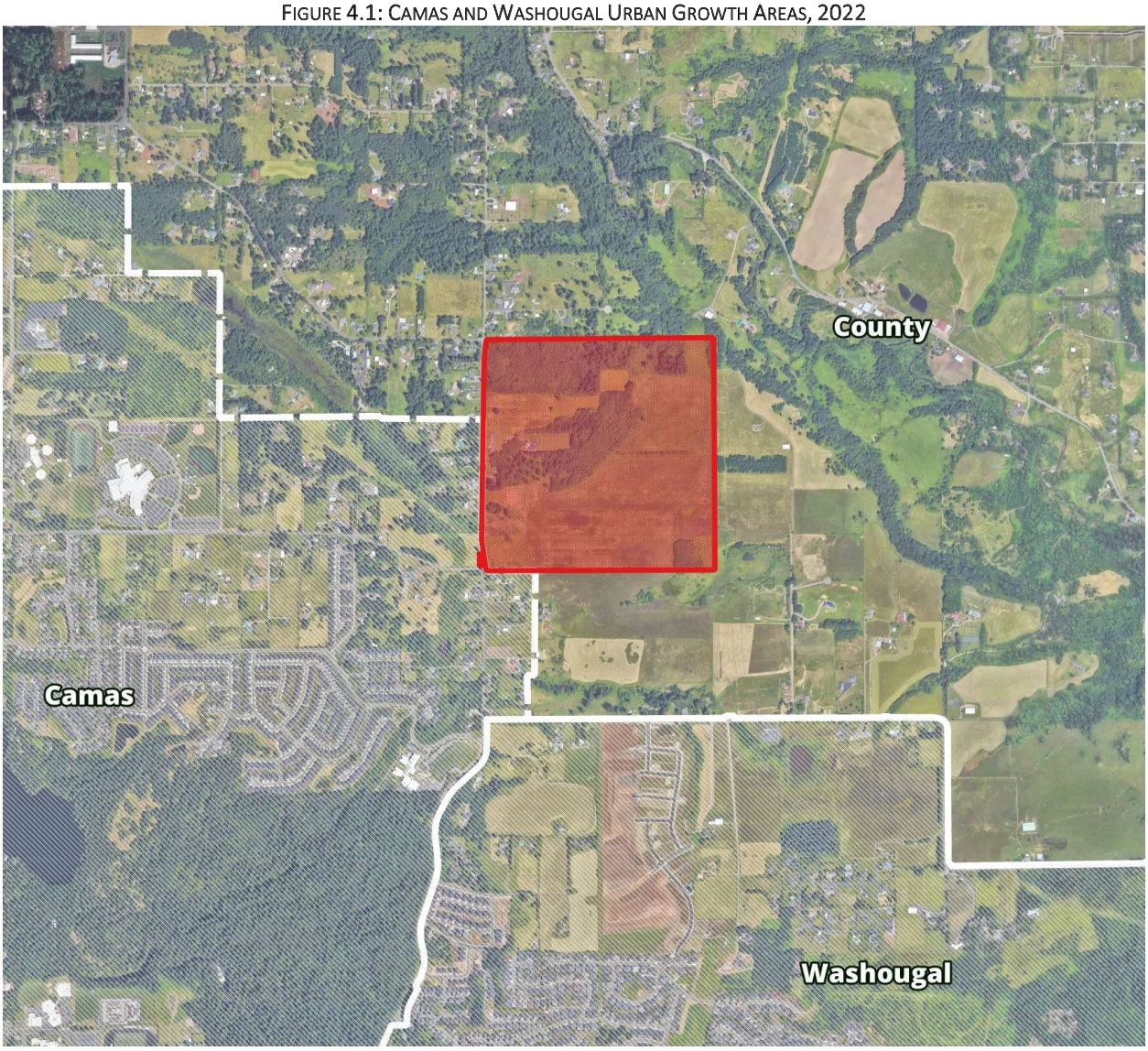
The northern portion of the subject site is divided into 15 smaller parcels. Each of these is currently allowed a single dwelling unit, and this portion of the site could be developed as rural residential lots within the current entitlements.

In addition, two parcels immediately south of the subject property (outlined in blue above) were recently listed for sale and they are being considered for a church development, which is a use allowed outside urban areas.

IV. Characterization of Urban Growth

The subject property is adjacent to the Camas Urban Growth Boundary (to the west and south) and is less than half a mile from the Washougal Urban Growth Boundary (to the south). The parcels on the inside edges of these boundaries are zoned for residential use. These boundaries were last updated in 2022, according to Clark County's GIS system.

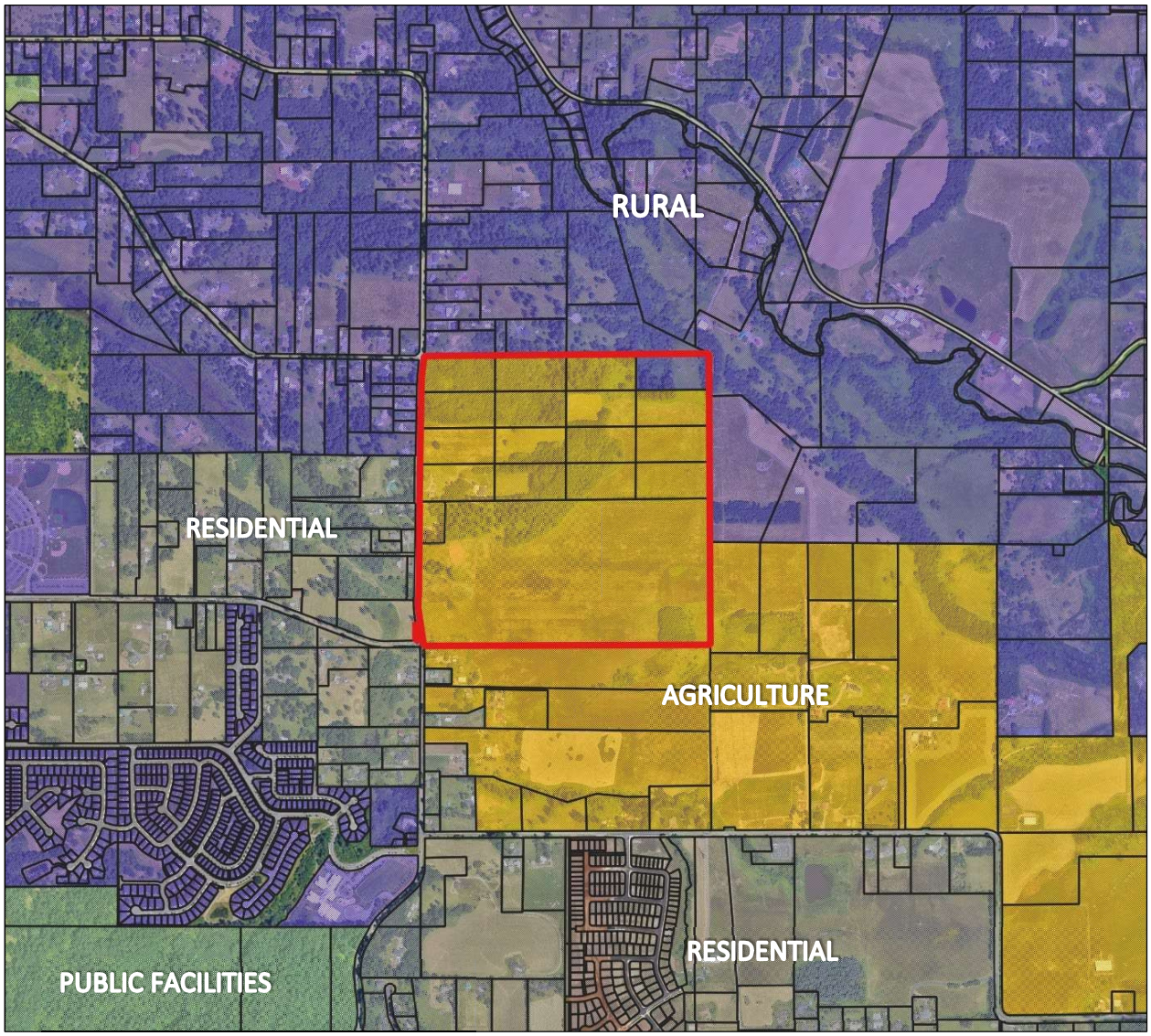
Figure 4.1: Camas and Washougal Urban Growth Areas, 2022



SOURCE: Clark County, Johnson Economics

The subject property is primarily zoned for agricultural use, with one parcel (upper right) zoned Rural (R-10). Rural zoning, which includes residential use, continues to the north and east of the property. The land to the south and southeast of the subject property is also zoned for agricultural use, with the land to the west and farther to the south, inside urban growth boundaries, zoned residential. Of the surrounding parcels with Rural zoning, most are 0.5 to 6 acres in size and contain one home.

FIGURE 4.2: CLARK COUNTY ZONING, SUBJECT PROPERTY AND SURROUNDING

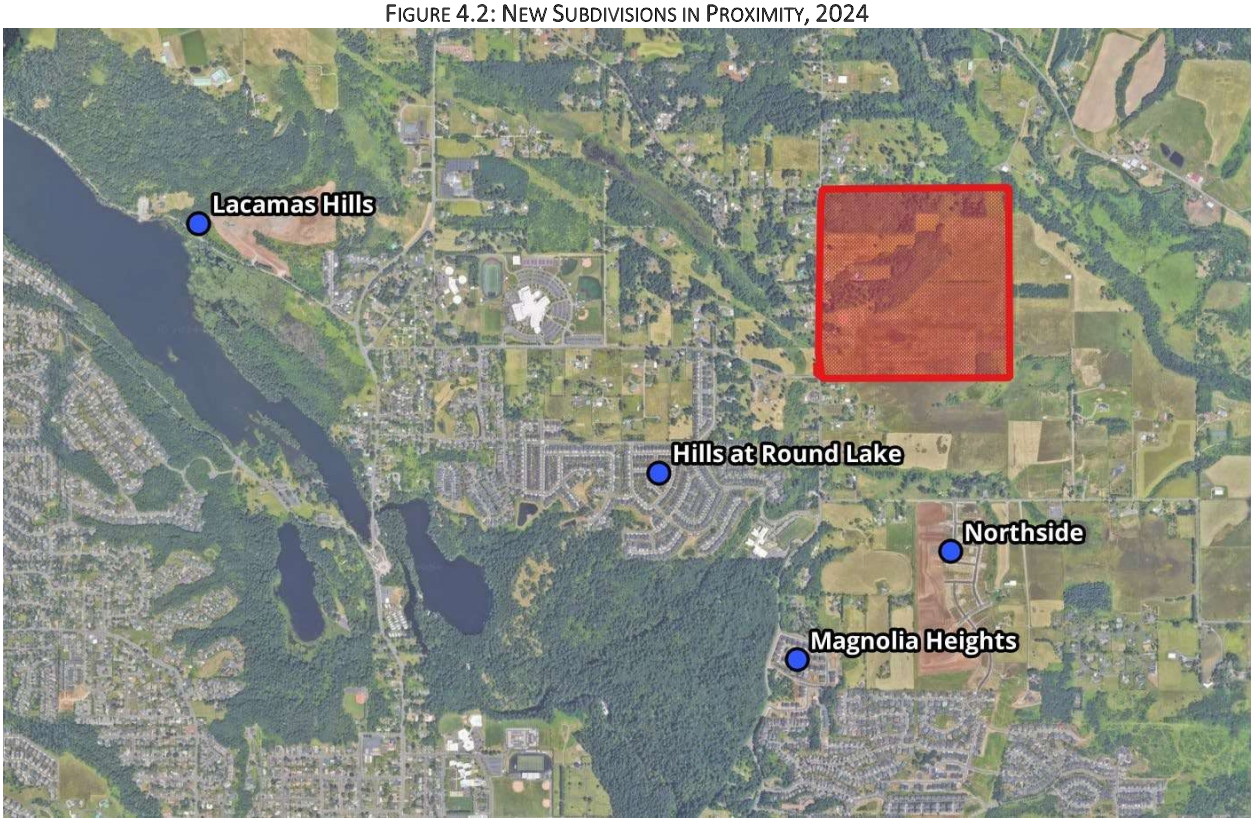


SOURCE: Clark County, JOHNSON ECONOMICS

Within two miles of the subject property, there are two subdivisions that have been built out since 2013 and two subdivisions that are currently under construction. Hills at Round Lake, southwest of the subject site, includes 307 homes and was built in thirteen phases from 2013 to 2018. Magnolia Heights to the south, with 38 homes, began construction in 2020 and finished by the end of 2023. All homes in this subdivision have sold. The two projects under

construction, Northside and Lacamas Hills, represent a total of 432 new home sites. These subdivisions are mapped below.

FIGURE 4.2: NEW SUBDIVISIONS IN PROXIMITY, 2024



SOURCE: Clark County, JOHNSON ECONOMICS

Single-family home development has also increased outside of subdivisions, especially to the south and east of the subject property. To the east, Southeast 269th Avenue was paved and extended in 2019, creating two new home sites on parcels designated as agricultural land. Given the proximity of urban growth areas and new residential developments, we determine that the subject property is characterized by urban growth.

V. CURRENT AGRICULTURAL PRODUCTION

According to the property owners, no crops have been grown on the subject property for at least 30 years, and possibly longer. The following satellite imagery shows natural haying for weed abatement and fire hazard mitigation in 2005, on three of the 5-acre parcels, and in 2009, on nine of the 5-acre parcels. No hay was sold at any point.

FIGURE 5.1: HAYING FOR FIRE & WEED CONTROL IN JULY 2005 AND SEPTEMBER 2009



SOURCE: Google Earth, JOHNSON ECONOMICS

The south half of the subject property has been hayed more recently, but again, only for weed abatement and fire hazard mitigation and the hay was not sold. The following satellite imagery shows haying in 2020 on the 79-acre parcel.

FIGURE 5.2: HAYING FOR FIRE & WEED CONTROL ON PARCEL 18, AUGUST 2020



SOURCE: Google Earth, JOHNSON ECONOMICS

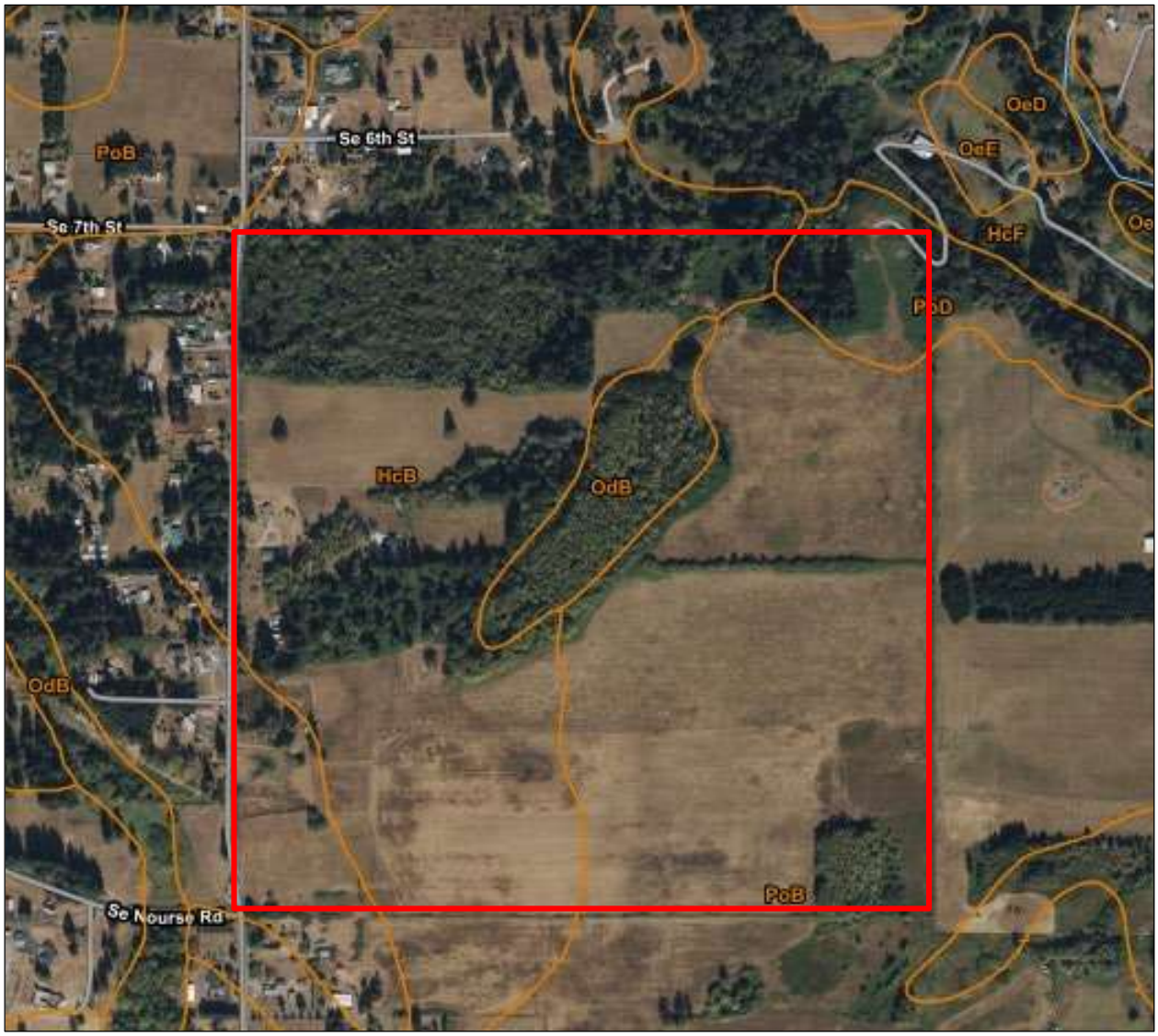
Within half a mile of the subject site, there are several small-scale farm operations that have produced hay at some point in the last decade. There are at least two small Christmas tree farms. One tree farm is on a 23-acre lot, but less than half of that is used to grow the trees, and the other is on 16 acres, most of which is not farmed. To the northeast is a 115-acre dairy and hay farm. To the southeast, there is a very small-scale, 21-acre farm that grows a variety of produce and sells through a farm stand.

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 about half Hesson clay loam (HcB and HcD), up to 20 percent slopes, on the north and west sides. The land capability classification of these are Class II and Class IV, with subclass *e* (subject to erosion). According to the Clark County Assessor, the most appropriate crops for these types of soils are hay, pasture, and some grasses. The east half of the property is Powell silt loam (PoB and PoD), and a small central area, mostly occupied by trees, is Odne silt loam (OdB). Both of these areas are Class VI, and the most suitable crops are hay, pasture, and some grains and grasses.

FIGURE 6.1: USDA SOIL CLASSIFICATION, 2019



SOURCE: USDA Web Soil Survey, JOHNSON ECONOMICS

AVAILABILITY OF PUBLIC FACILITIES

To the left of the subject property is Southeast 283rd Avenue, which has two travel lanes, each 10 feet wide, and no shoulders. This is the only road that provides direct access to the site. The posted speed limit is 40 miles per hour, and intersections are controlled with stop signs. No adjacent roads are included in the Clark County Six-Year Transportation Improvement Plan. There is an ongoing project on SE Blair Rd, to the right of the subject property, but this road is not connected to the site.

In the City of Camas General Sewer Plan Update of 2022, the subject property is not included in the future service area. It will be adjacent to the future service area on the west boundary, indicating potential for service farther in the future.

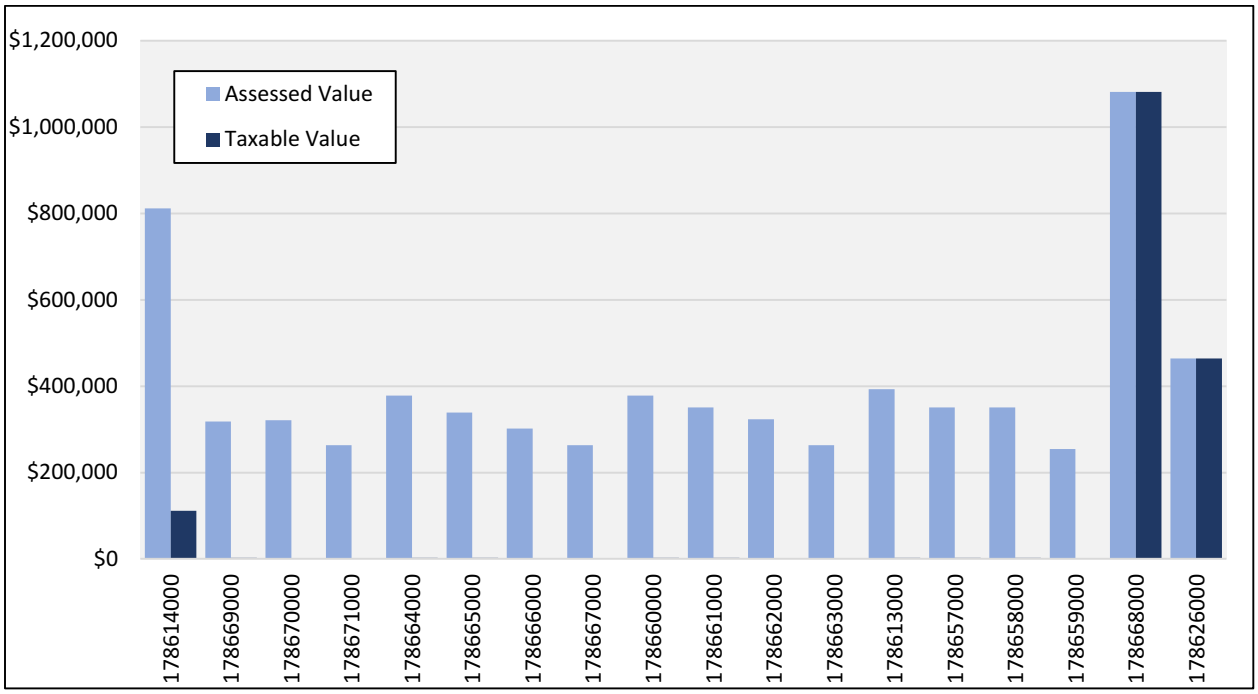
The Camas Water System Plan Update of 2019 shows the subject property within the future water service boundary, though no specific timeline is provided. A water main exists along the west boundary of the property already. The City also has plans to upsize the existing supply lines around the subject property and add a water storage area within two miles by 2035.

The Lacamas Park Trail system is the closest city park to the subject site, about half a mile to the southwest. It offers six miles of hiking trails, with Woodburn Falls at the center and Round Lake to the northwest. A neighborhood park is planned at the Northside subdivision.

Tax Status

Sixteen out of eighteen of the parcels within 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. For most of the parcels, the taxable value is essentially negligible. The last two parcels are not under Current Use, and so are taxed at their full market value.

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



SOURCE: Clark County Assessor, JOHNSON ECONOMICS

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

> *"any parcel of land or contiguous parcels of land that are 20 or more acres: (i) devoted primarily to the production of livestock or agricultural commodities, for commercial purposes; (ii) enrolled in the federal conservation reserve program or its successor administered by the United States Department of Agriculture; or (iii) other similar commercial activities as may be established by rule… 'Commercial agricultural purposes' means the use of land on a continuous and regular basis, prior to and subsequent to application for classification or reclassification that demonstrates that the owner or lessee is engaged in and intends to obtain through lawful means, a monetary profit from cash income by producing an agricultural product" (RCW Chapter 84.34 and 84.33).*

As of April 2024, 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 since they no longer meet the 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 back taxes plus interest to be around $584,900.

Availability of Public Services

The subject property is 1.5 miles southeast of the East County Fire & Rescue Station 91 in Camas, within the Camas-Washougal Fire District. It is about two miles from downtown Camas and the city police station, though the subject property is within the jurisdiction of the Clark County Sheriff's Office, which does not have a precinct nearby.

The nearest medical center with an emergency department is PeaceHealth Southwest Medical Center, about 11 miles to the west. The hospital is currently expanding their emergency department capacity, with estimated completion in 2025.

The subject property is in the Camas School District, about three-quarters of a mile from Camas High School, half a mile from Woodburn Elementary School, and two miles from Liberty Middle School.

Proximity to Urban Growth Areas

The subject property is adjacent to the Camas Urban Growth Boundary, and less than half a mile from the Washougal Urban Growth Boundary. It is within two miles of four subdivisions that were recently built or that are under construction, with a total of almost 800 new home sites. This demonstrates proximity to urban growth areas.

Parcel Size

The parcels range in size from 2 to 79.2 acres, though most are about 5 acres. Two of these, one 5-acre parcel and the two-acre parcel, have at least one residence. Each of the 5-acre sites are allowed a dwelling unit, and the northern half of the site could be developed as rural residential under current zoning.

Land Use Patterns & Intensity of Surrounding Land Use

Immediately surrounding the subject property, to the west, north, and east, are single-family homes on 0.5 to 6 acre lots. There are a few larger lots that, like the subject property, are also under the Current Use program for open space and agricultural land. These include a few small farms that produce hay, one dairy farm with 140 cows, and a small-scale vegetable farm, but there are no large commercial farms close to the subject property. To the south, there are a few parcels of agricultural land, some open space, and then a subdivision under construction. High voltage transmission lines run along the eastern edge of the property in a BPA easement.

New residential development is taking place primarily to the west and south, inside the Camas and Washougal UGAs. As those cities grow, new residential subdivisions will move towards the current UGA boundary and potentially even adjoin 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

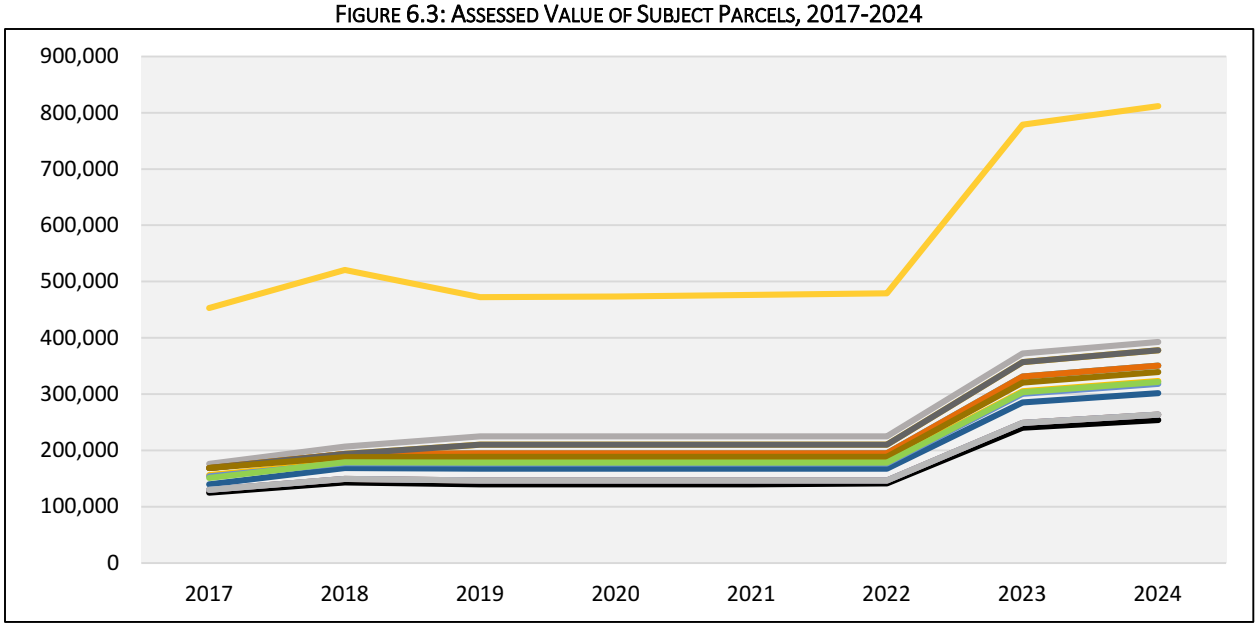
In the last five years, three subdivision permits have been issued within two miles of the subject property. Magnolia Heights to the south, with 38 homes, was issued permits and began construction in 2020. This project has been completed. Northside, with 280 homes, was permitted in 2020 as well, though construction has been delayed somewhat. Homes began selling this year. Lacamas Hills Subdivision is the newest subdivision, with building permits issued in 2022 for 152 homes in three phases. Permits issued nearby are overwhelmingly residential, indicating again that the subject property is characterized by urban growth.

Land Values under Alternative Uses

Under the Current Use program, the 5-acre parcels are valued at $1,400 to $2,500 per parcel. At fair market value, they are valued from $250,000 to $378,000 per parcel. The 79-acre parcel is valued at $111,000 under Current Use and $811,800 at fair market value. Parcel #13, which contains two homes, is assessed at over $1 million. Adjacent parcels with single-family homes have land values in this range, although these parcels are smaller, 3-4 acres. The assessed prices reflect residential development values and are much higher than what a farmer would reasonably pay to use the land for agricultural production.

The 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 2022 to 2023, assessed values increased by 62-70%. A steep increase like this indicates a shortage of land available for residential development.

Figure 6.3: Assessed Value of Subject Parcels, 2017-2024



SOURCE: Clark County Assessor, Johnson Economics

Proximity of Markets

Assuming hay or livestock production (more on this below), 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

As detailed above, hay production and livestock operations are the two possible options for farming at the subject property, especially given land capability and water availability. In Washington State, non-irrigated hay crops yield 1.8 to 3.8 tons per acre. County level data is not available, but a similar report to de-designate a property in Clark County estimated a yield of 2.0 tons per acre, so we will use this number. The USDA Washington-Oregon Hay Report for end of April 2024 estimates sale prices of $300 per ton for medium quality hays. From these we estimate hay crop revenue to be about $600 per acre. About 90 of the 161.2 acres at the subject property are currently useable for farming; the remaining area has homes or trees. This gives total estimated revenue from hay production of $54,000. Costs would include equipment, fertilizer, and labor, none of which are currently in use at the subject property.

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 40 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 animals, 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 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, excluding the parcels with homes, is $5.6 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. It is not economically feasible to conduct agricultural operations on the subject property, and therefore, the subject property does not have long-term commercial significance for agriculture.

VII. Water Rights

Water right holders in Washington State, including Clark County, may hold one of two broad categories of water rights: a groundwater right or a surface water right. A groundwater right allows for water to be withdrawn from a well. Groundwater rights may allow for a range of uses. However, groundwater use for domestic and industrial uses of up to 5,000 gallons per day each, irrigation of up to half an acre, and stock water in an unlimited amount, which is water for livestock, are groundwater uses that are "exempt" from the requirement to obtain a permit. However, even though these uses are exempt from a permit requirement, a water right user with a claim to this type of use must submit a claim to the Department of Ecology. A surface water right allows a property to use water diverted from a river, creek, lake, or similar. Consumptive water use, which can include consumptive use of groundwater or consumptive use of surface water describes water use that removes from a water supply without returning to the supply; examples include irrigation and manufacturing water use.

Three of the parcels within the subject property have an associated groundwater claim. The largest parcel (79 acres) is the place of use for a groundwater claim for general domestic or stock water purposes. Parcel 10, which is one of the 5-acre parcels, has groundwater rights for domestic use, irrigation of half an acre, and stock water purposes. The 5-acre parcel on the northwest corner of the site holds groundwater rights for domestic use only.

None of the water right claims at the subject property are for irrigation of an agricultural crop, which means that there is no right or claimed right that would allow irrigation on the property beyond one half acre. This prevents the production of high value crops, such as berries and vegetables.

Options for additional water use are also limited. As an unofficial policy, the Washington State Department of Ecology is not issuing new water rights in Clark County. Buying existing rights would cost up to $3,000 per acre, according to Clark County farmer Bill Zimmerman, assuming that those rights are available. Another option is to buy public water, supplied to the subject property from the City of Camas, which may be as expensive yearly as buying existing rights, Zimmerman estimates.

VIII. The State of Agriculture in Clark County

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

As of 2022, there were just over 1,900 farms in Clark County, according to the USDA. This includes 56,000 total acres, down 38% from 2017, when there were over 90,000 acres of land in farms. However, the number of farms in the



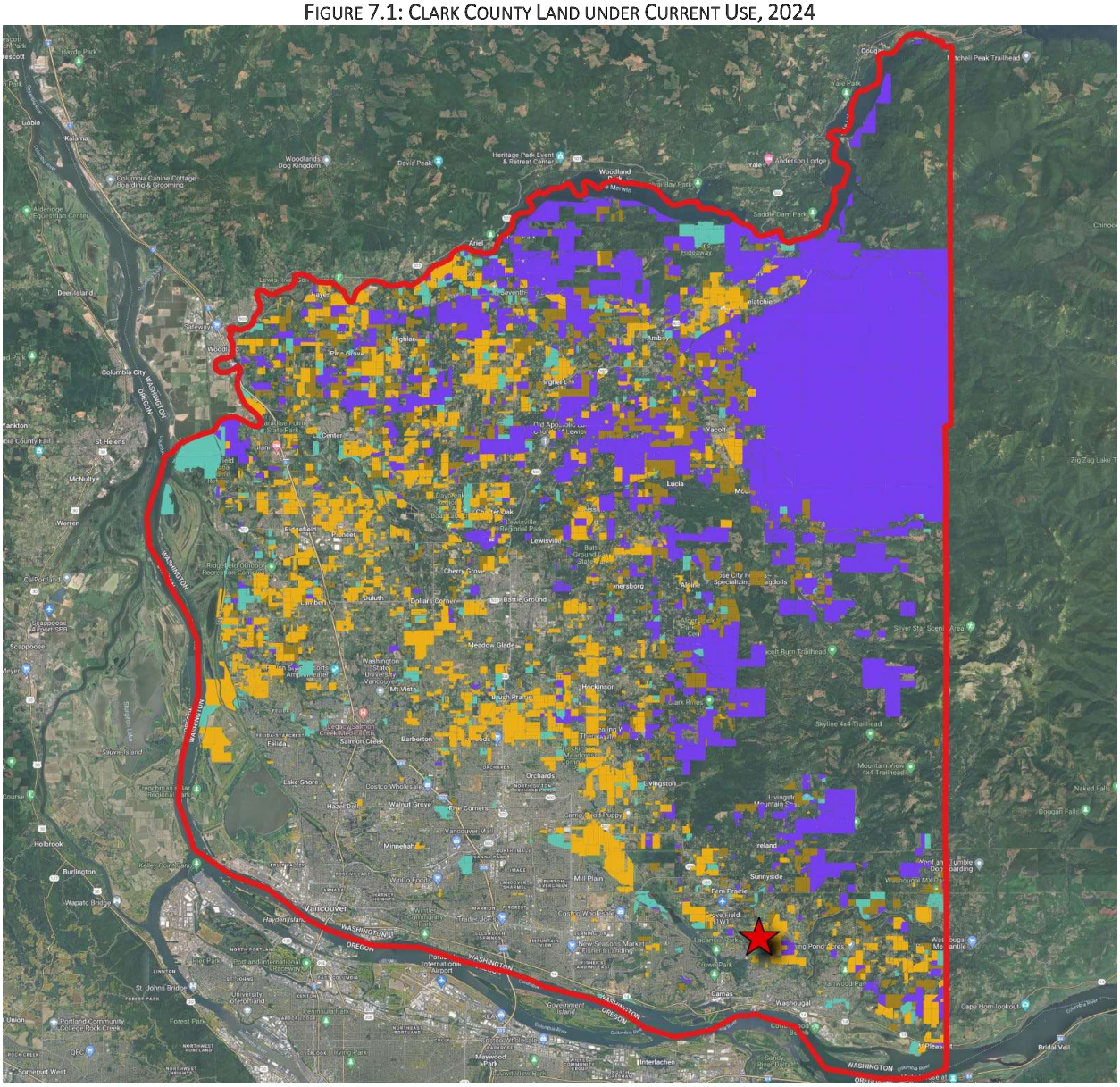
county only decreased by 3%, suggesting that either a few large farms have ceased operations or that many farms have decreased in size.

On average, farms in Clark County are primarily small in size and scale: almost 70% of farms make less than $5,000 in sales, and almost 90% of farms are smaller than 50 acres. Average farm-related income increased 132% from 2017 to 2022, but average net cash farm income is still negative at -$230.

The most produced crops in Clark County, by acreage, are hay (13,500 acres), Christmas trees (910 acres) and berries (855 acres). This is in line with current and historic crop production at and around the subject site.

Natural resource lands in Clark County are designated under the Current Use program, as described earlier in this report. About 36% of the county's land by area is classified under this program. Of the total land in Current Use, 25% is agricultural land (yellow), and the rest is open space (teal), designated forest land (purple), or timber land (brown). The subject property makes up about 0.5% of total agricultural land area in Clark County.

FIGURE 7.1: CLARK COUNTY LAND UNDER CURRENT USE, 2024

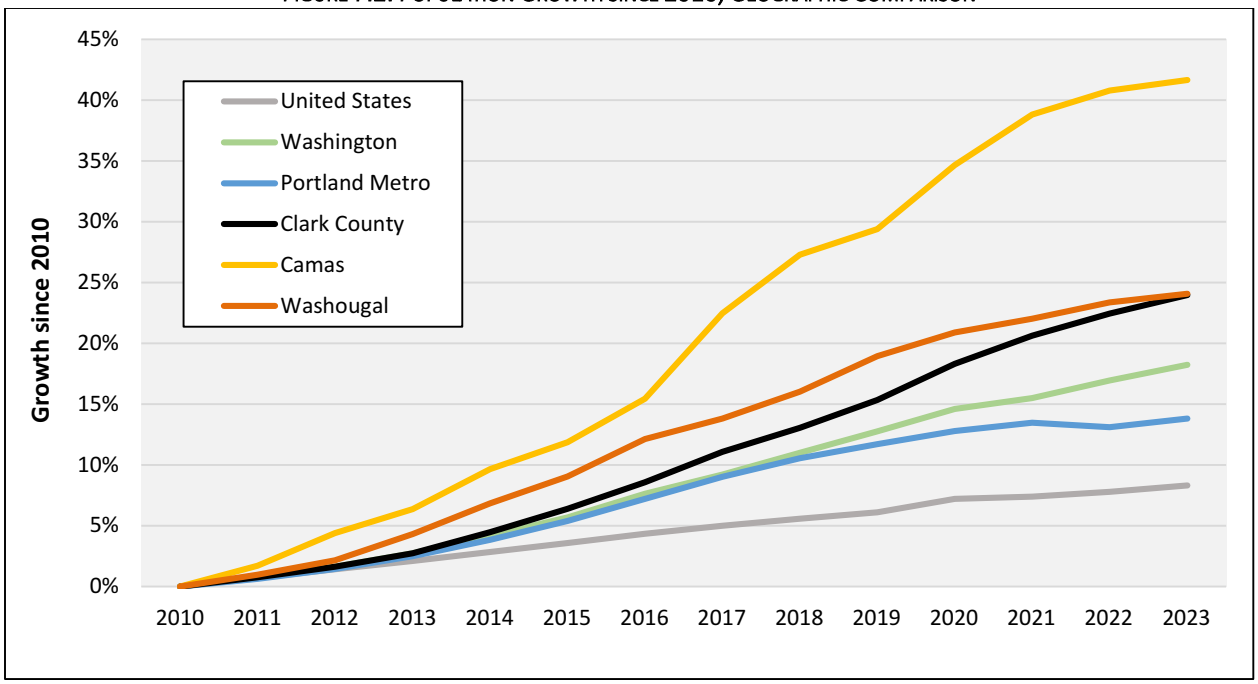


SOURCE: Clark County, JOHNSON ECONOMICS

POPULATION 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, Camas saw a 42% increase in population, while Washougal's growth rate was on par with the county's. All three geographies are growing faster than the Portland Metro Area and the state.

FIGURE 7.2: POPULATION GROWTH SINCE 2010, GEOGRAPHIC COMPARISON



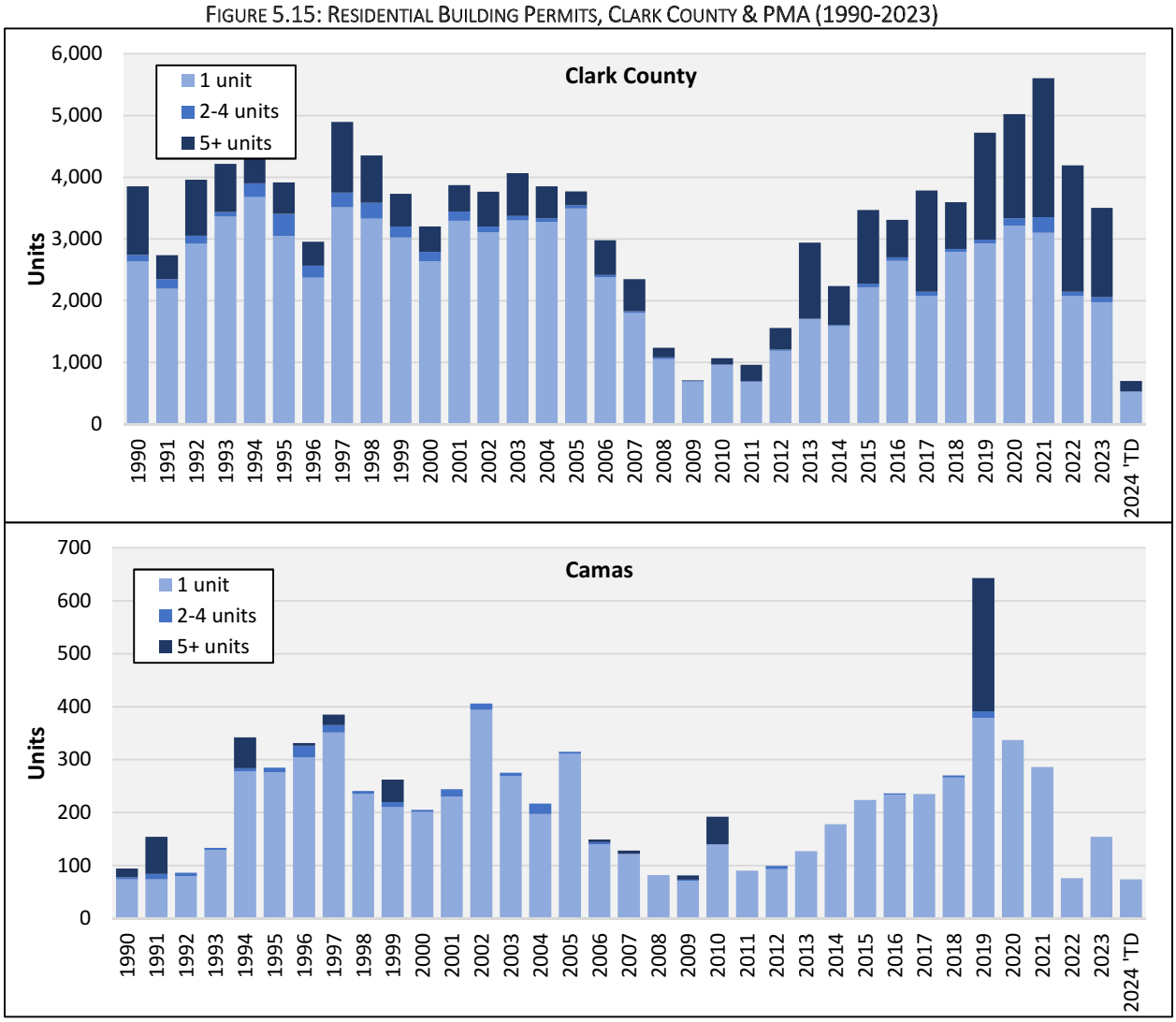
SOURCE: U.S. Census Bureau, Portland State University, WA Office of Financial Management, JOHNSON ECONOMICS

THE STATE OF HOUSING IN CLARK COUNTY

The increasing population in the county indicates a need for more housing, especially in fast- growing areas such as Camas. 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 similar in Camas, which has seen higher population growth compared to the county but is more land constrained. The city has seen a few larger multifamily projects in the last few years, though apartment construction is nowhere near Vancouver levels.

FIGURE 5.15: RESIDENTIAL BUILDING PERMITS, CLARK COUNTY & PMA (1990-2023)



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

The disparity between single-family and multifamily construction in Camas is partly due to the city's position as a Portland suburb. Subdivisions of medium to large single-family homes, which require more land area than multifamily homes, are the primary form of residential construction in suburbs. Camas does not have the land area for large new residential developments, such as the Hills at Round Lake, without de-designating some of its agricultural land.

In 2015, the Camas 20-Year Comprehensive Plan projected a need for 3,868 new housing units by 2035. Since 2015, about 2,300 residential units have been permitted, the vast majority of which (87%) are single-family homes. The city is not meeting its allotment of middle- and higher-density housing as outlined by the county. Camas is required to plan for about 765 middle housing units and 2,380 apartment units between 2025 and 2045. Tentative site plans for the subject property include up to 184 cottages and townhomes; this would meet 24% of the city's allotted middle housing units. De-designation of the subject property could support higher density housing in Camas.



IX. RECOMMENDATIONS

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 and is therefore recommended for de-designation as agricultural land:

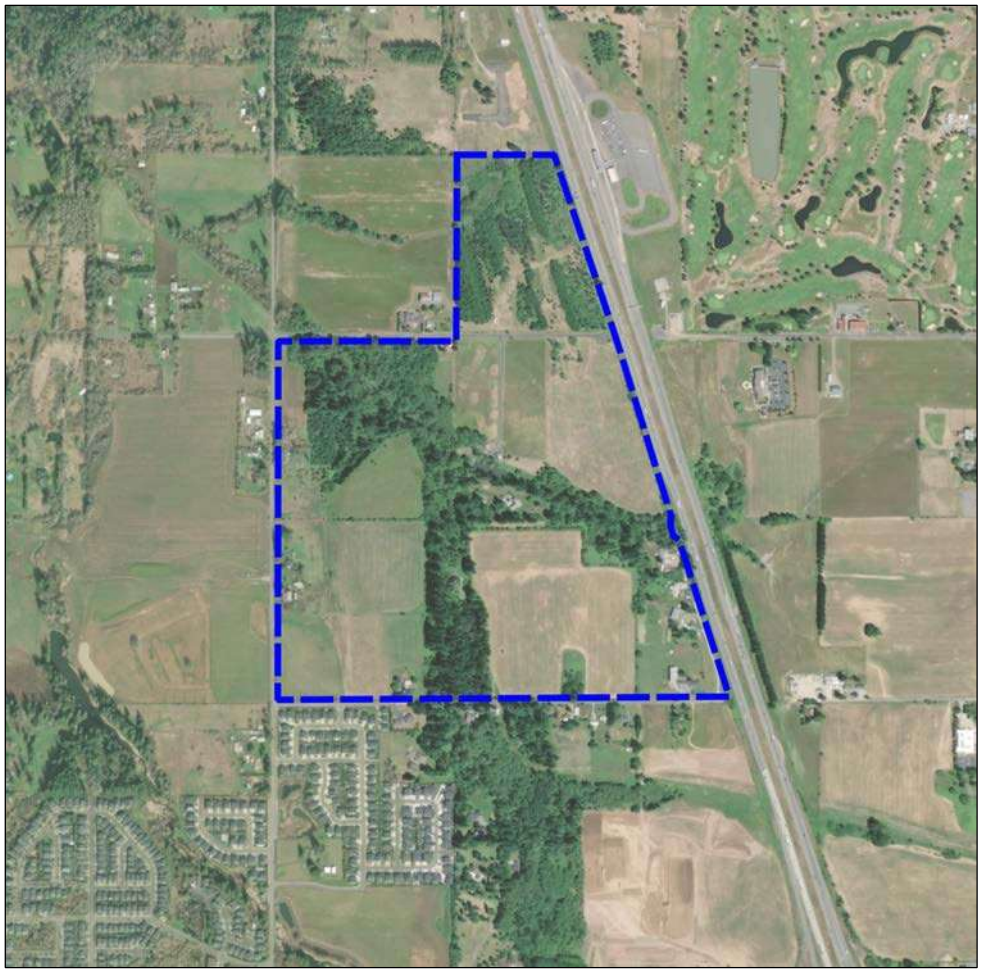
- The property is characterized by urban growth. It is adjacent to the Camas UGB and less than half a mile away from two large (250+ unit) subdivisions, either recently completed or under construction. Camas is a fast-growing city that is running out of buildable land; its population has grown by over 40% since 2010.

- The property is not currently being farmed and no longer meets the criteria to be classified under Current Use for Farm and Agriculture, which will obligate the property owners to pay back taxes and interest estimated at $584,900. Additionally, the market value of the parcels is about $5.6 million, which would be a prohibitive cost for any use except residential. The only economically feasible way forward is to develop the parcels for residential use.

- The subject property lacks adequate water permits for commercial agricultural production, and it is not practical to buy existing rights or pay for public water use. This limits the types of farming on the site to hay and livestock operations primarily, which are not considered to be profitable on the subject property.

Appendix "B"

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 14
AVAILABILITY OF PUBLIC SERVICES 15
TAX STATUS 15
PROXIMITY TO URBAN GROWTH AREAS 16
PARCEL SIZE 17
LAND USE PATTERNS & INTENSITY OF SURROUNDING LAND USE 17
HISTORY OF PERMITS ISSUED NEARBY 17
LAND VALUES UNDER ALTERNATIVE USES 18
PROXIMITY OF MARKETS 19
HAY/LIVESTOCK PRODUCTIVITY 19
VII. THE STATE OF AGRICULTURE IN CLARK COUNTY 19
POPULATION & DEVELOPMENT TRENDS 22
VIII. RECOMMENDATIONS 24

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 is zoned with an urban reserve and industrial overlay. 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.

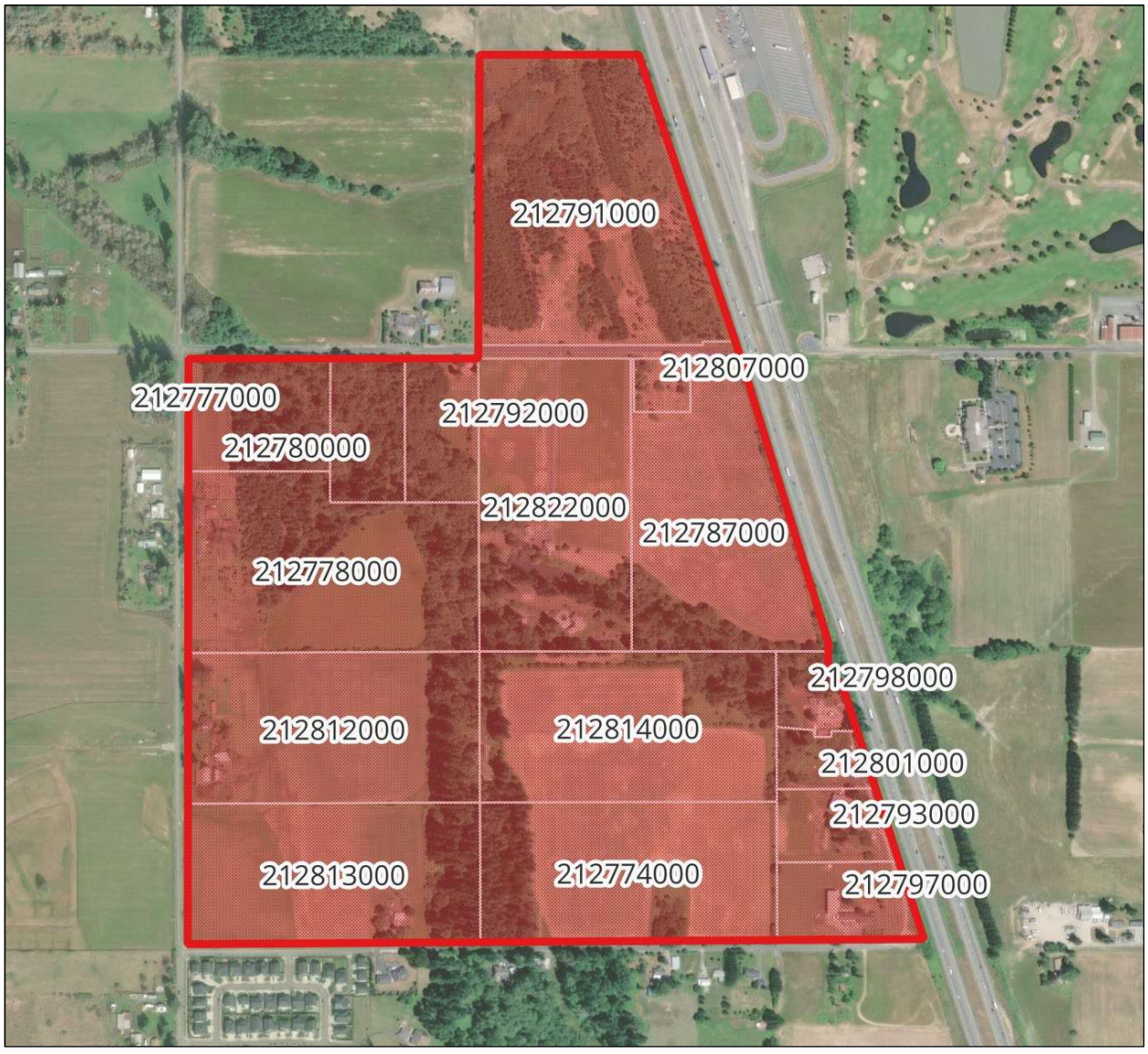
Ridgefield is also trending towards more residential and commercial use and less agricultural use. From 2017 to 2022, Ridgefield's population increased by over 200%, and over 3,000 new residential units (2,500 single-family homes) were permitted within the city. Furthermore, almost 1.2 million square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

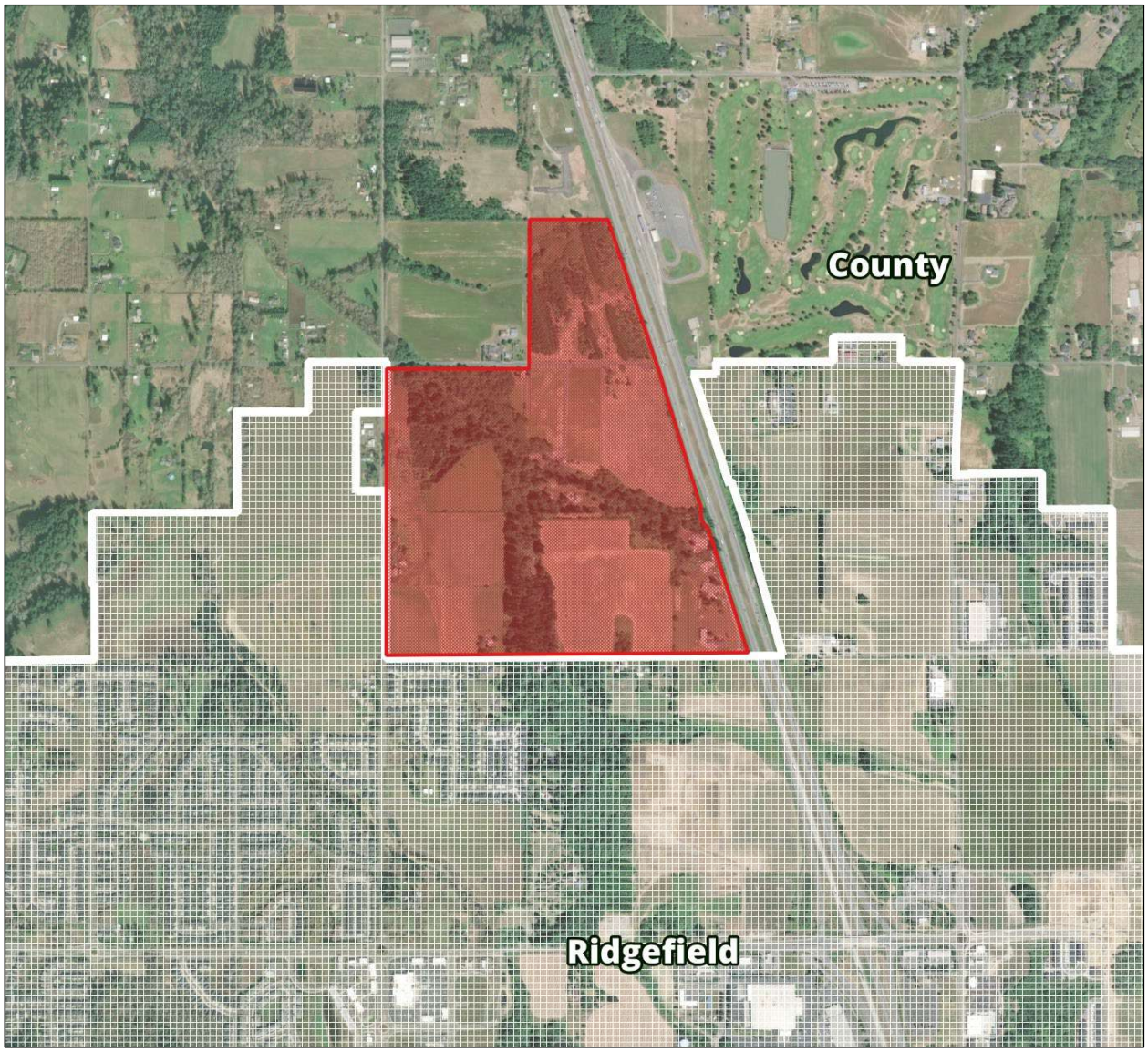


Eleven out of the sixteen parcels are within the Current Use program and have been since the development of Clark County's comprehensive plan, which was adopted in the 1990s. Current Use allows open space, timber, agricultural, and forest lands to be taxed at the value of their current use, rather than 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.

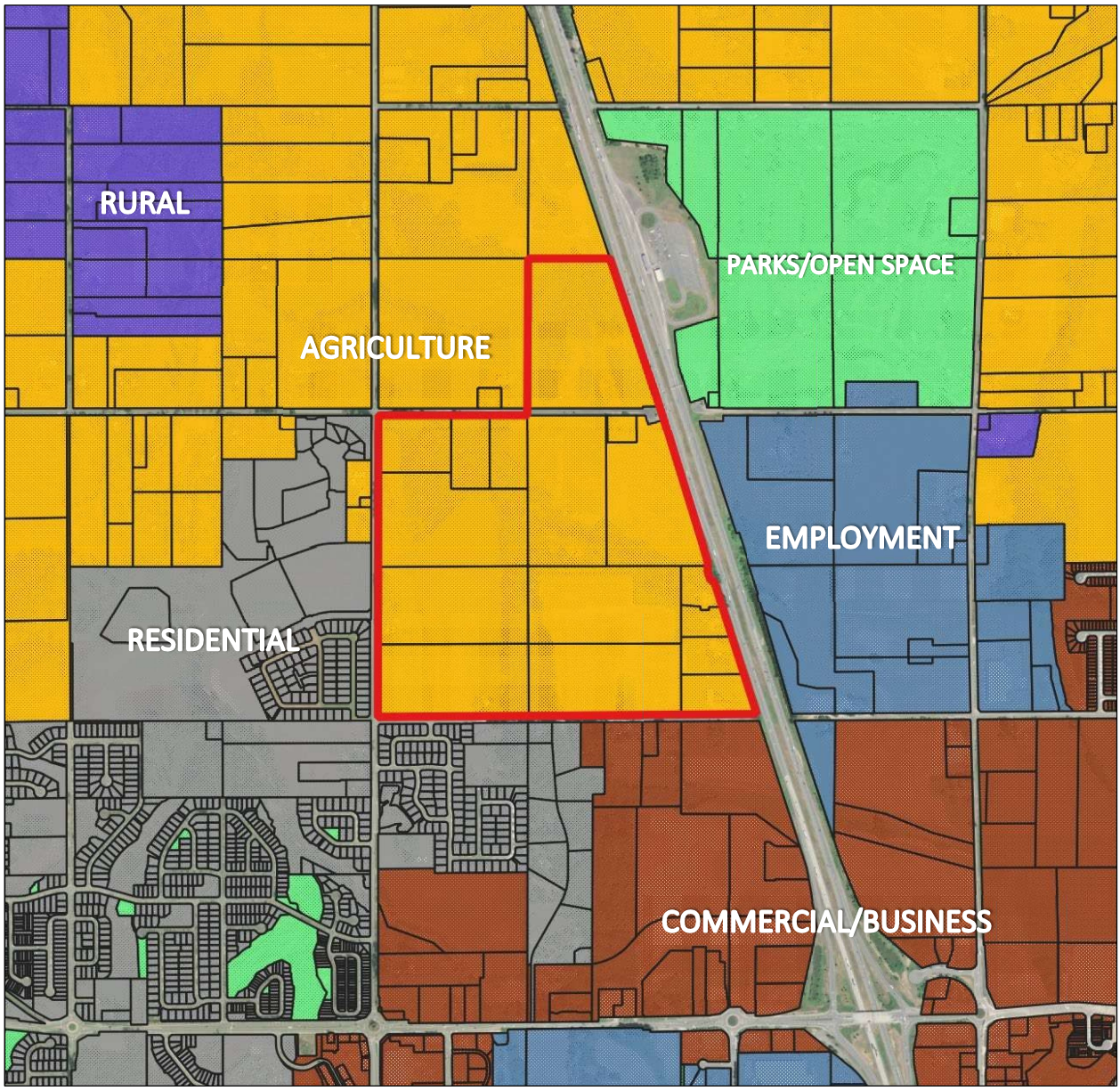
FIGURE 4.1: RIDGEFIELD URBAN GROWTH BOUNDARY, 2022



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. The property is also zoned with an urban reserve and industrial overlay and has been tentatively planned for industrial use in recent years.

FIGURE 4.2: CLARK COUNTY ZONING, SUBJECT AND SURROUNDING PROPERTIES



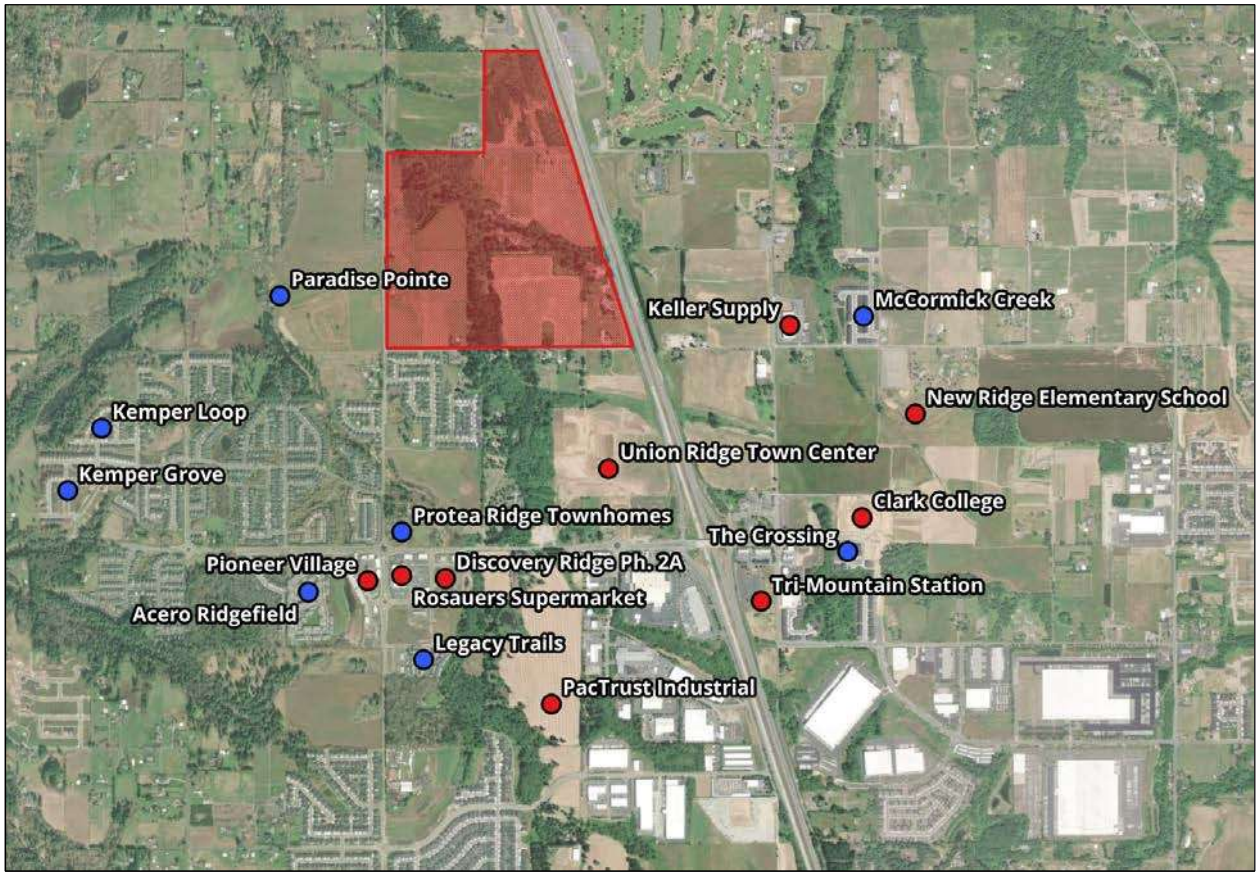
SOURCE: Clark County, JOHNSON ECONOMICS

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

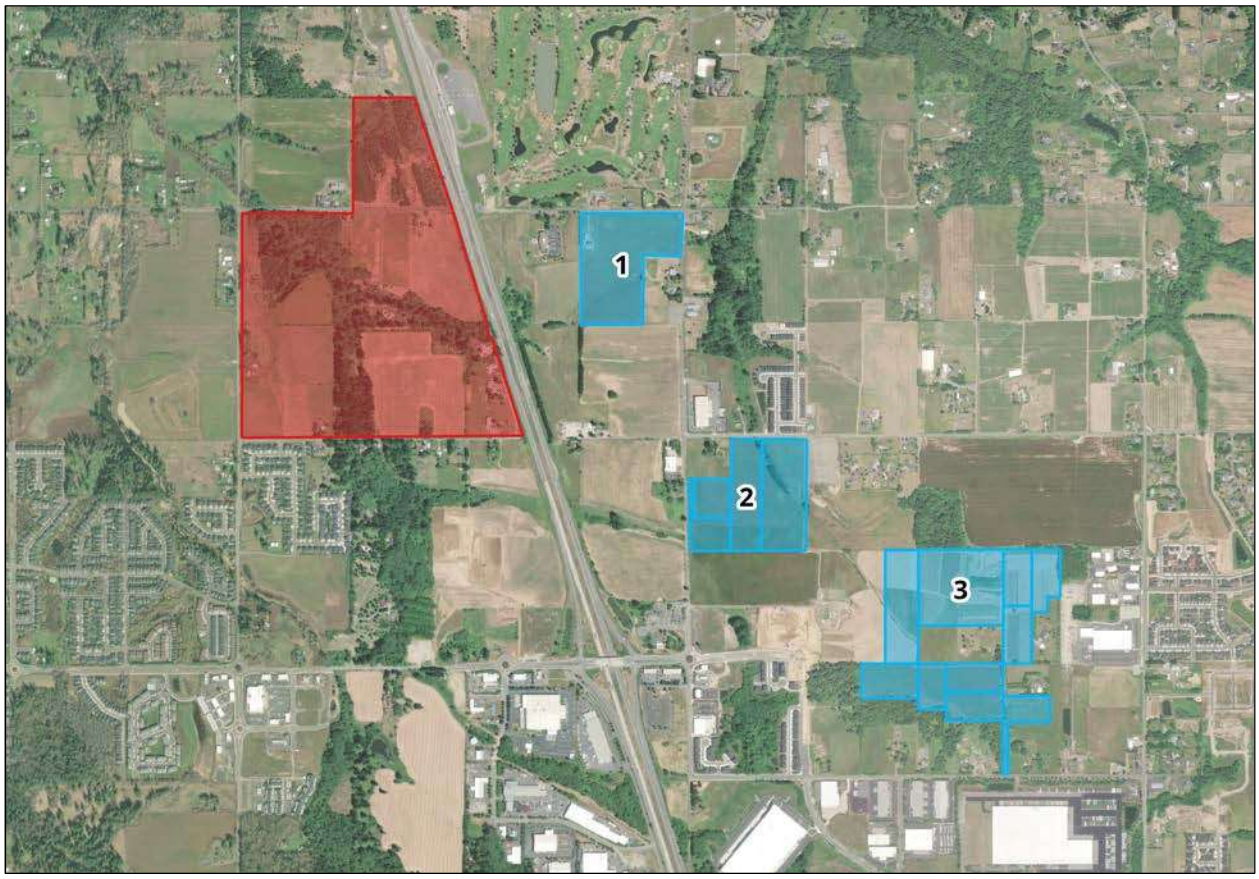


SOURCE: Clark County, JOHNSON ECONOMICS

About 1.5 miles north of the subject property is the Cowlitz Tribe reservation. The first major development in that area was the Ilani Casino in 2016, followed by several small commercial developments (gas stations, convenience stores) at the Interstate 5 interchange, and then expansions to Ilani's hotel, parking garage, and conference center.

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

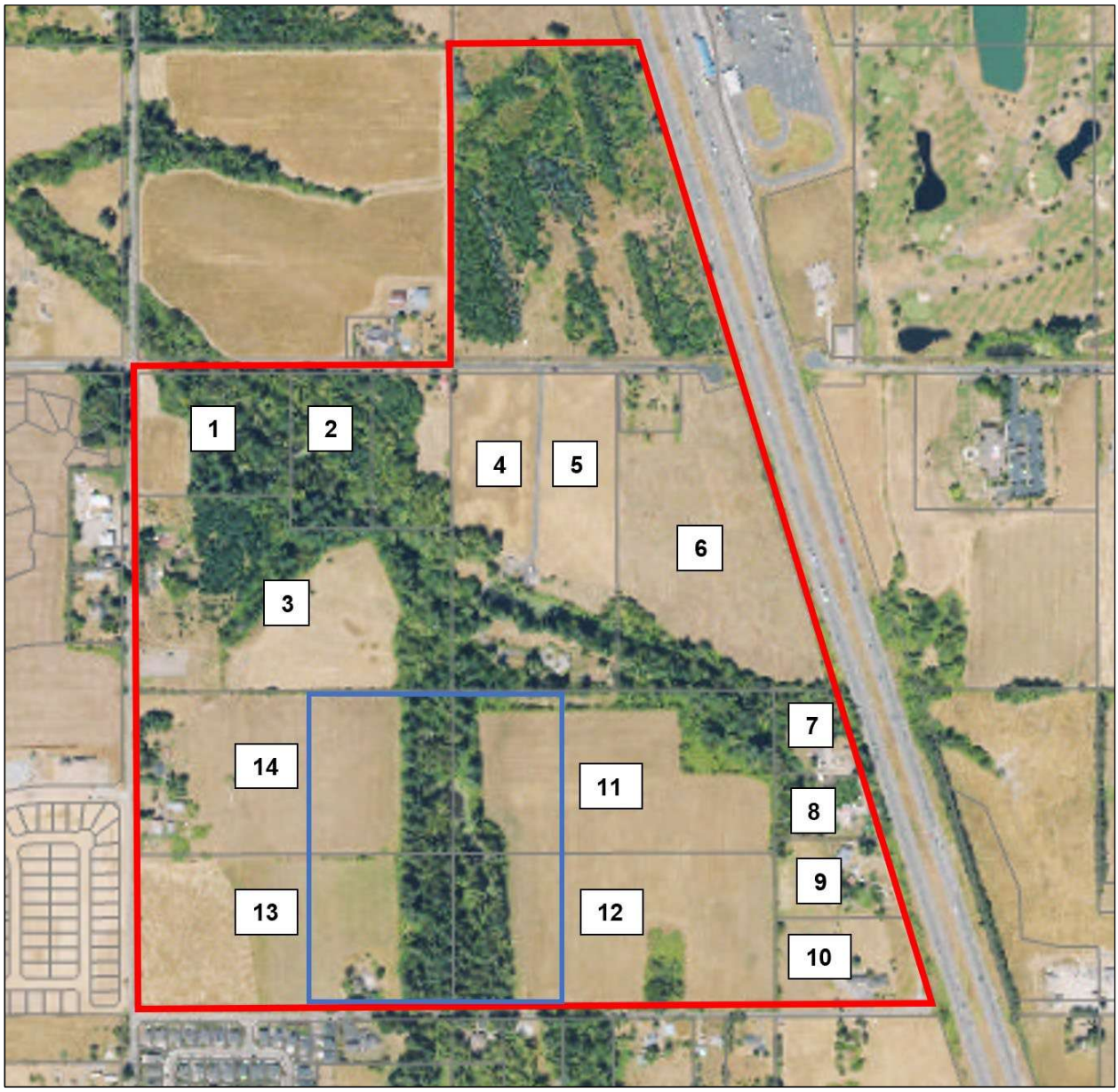
The subject property has five groundwater claims of record and two appurtenant water right certificates. We summarize the scope of each of these water rights here.

The first groundwater claim is located in the northwest portion of the subject property. It has a point of withdrawal on Parcel 3 and authorizes water use for stockwater and domestic purposes on Parcels 1, 2, and 3. In the northeast portion of the subject property, three groundwater claims share a point of withdrawal on Parcel 6. These three claims authorize domestic use of water on Parcels 4, 5, and 6. Finally, the fifth groundwater claim authorizes domestic use and irrigation of six acres on some portion of Parcels 7-10. This claim does not contain an accompanying map or a readable legal description, so it is not possible to determine precisely where the six irrigated acres are located within Parcels 7-10.

In addition to the five groundwater claims, the subject property is covered by two water right certificates: S2-*16975C and G2-*08020C. S2-*16975C is a surface water certificate with a priority date of October 19, 1961. It authorizes 18 acres of primary irrigation at a rate of 0.07 cubic feet per second ("cfs"), up to 13 acre-feet ("AF") per year. It also authorizes stockwater use year-round at a rate of 0.01 cfs, up to 1 AF per year. The source for this water right is Allen Canyon Creek, and the original application indicates that the specific contemplated use is pasture irrigation. The place of use for this water right is identified in a map that accompanies the S2-*16975C application. It covers portions of Parcel 11, 12, 13, and 14, and is depicted in its approximate location by the blue outline below.

G2-*08020C is a groundwater certificate with a priority date of March 31, 1966. It authorizes 52 acres of irrigation at a rate of 32 gallons per minute, up to 26 AF per year. It also authorizes single domestic use up to 1 AF per year. The point of withdrawal is located in Parcel 13. While the file for G2-*08020C does not contain a place of use map, per the terms the certificate, the water right holder may irrigate 52 acres in Parcels 11, 12, 13 and 14. Note that the place of use of this water right appears to duplicate at least some portion of the 18 acres authorized under S2-*16975C, but the certificate does not clearly designate a relationship to this surface water right (i.e. supplemental use).

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.

A section of North Royle Road, south of North 10th Street, is included in the Ridgefield Six-Year Transportation Improvement Plan (2024-2029) as a development-built project; it will be completed by a private developer, as part of a larger project, rather than by the city. Another section of North Royle Road, north of Northwest 289th Street, is included as a future funded project.

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. Access to this service through the City of Ridgefield would be easily available if the subject property was annexed into the Ridgefield UGA. Electricity is provided by Clark Public Utilities and water service is provided by the City of Ridgefield. The city 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.

Availability of Public Services

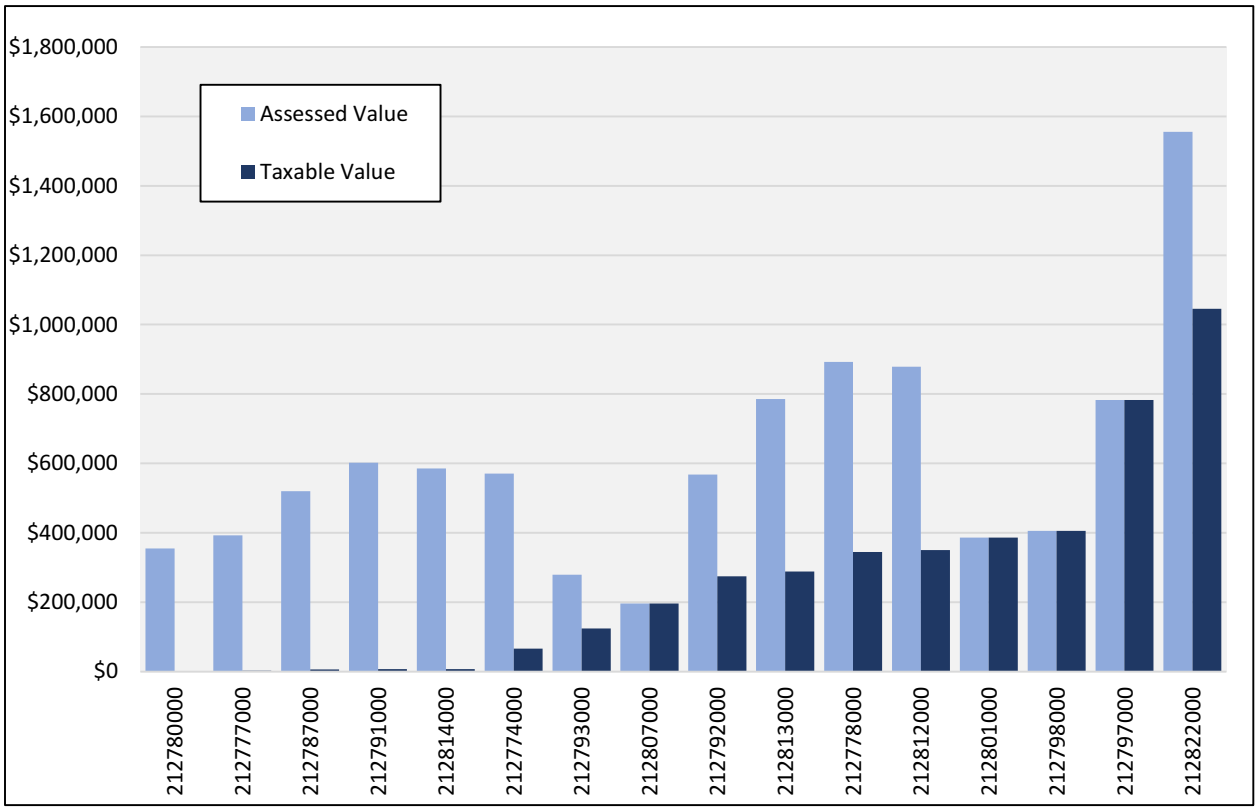
The subject property is about one mile west of the Clark-Cowlitz Fire Rescue Station 21, within the Clark-Cowlitz Fire District. It is about 2.5 miles east of the Ridgefield Police Department. The nearest medical center with an emergency department is Legacy Salmon Creek Medical Center, about eight miles 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***

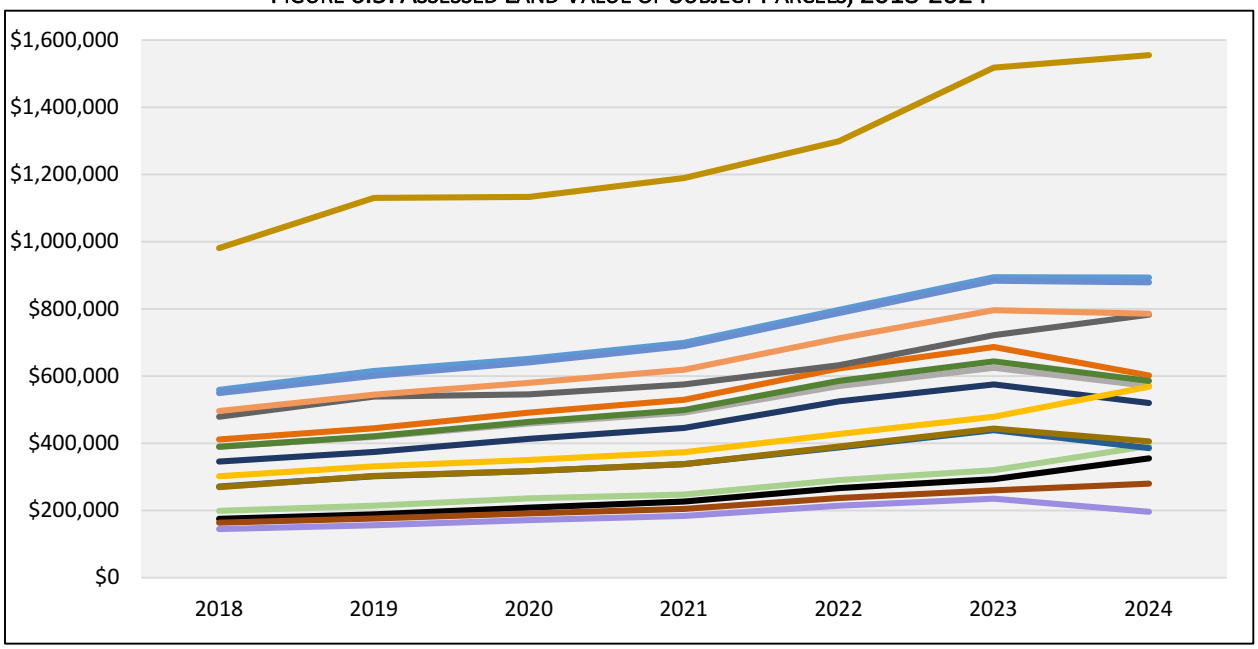
SOURCE: CoStar, Ridgefield Planning Department, Google Earth, local media, JOHNSON ECONOMICS

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.

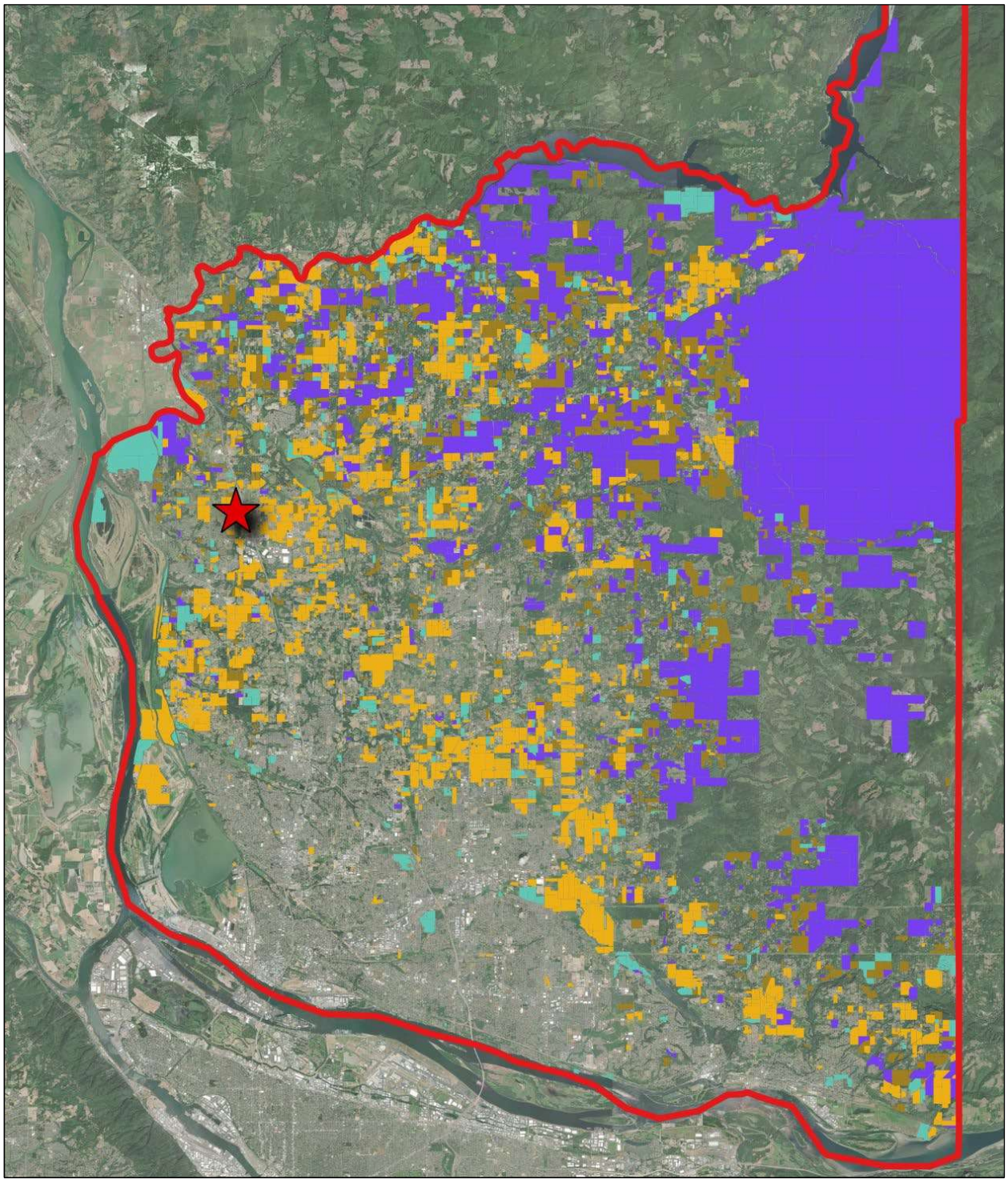
As of 2022, there were just over 1,900 farms in Clark County, according to the USDA. This includes 56,000 total acres, down 38% from 2017, when there were over 90,000 acres of land in farms. However, the number of farms in the county only decreased by 3%, suggesting that either a few large farms have 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 0.5% of the total Current Use designated agricultural land area and 0.1% of the total Current Use designated open space land area in Clark County.

FIGURE 7.1: CLARK COUNTY LAND UNDER CURRENT USE, 2024

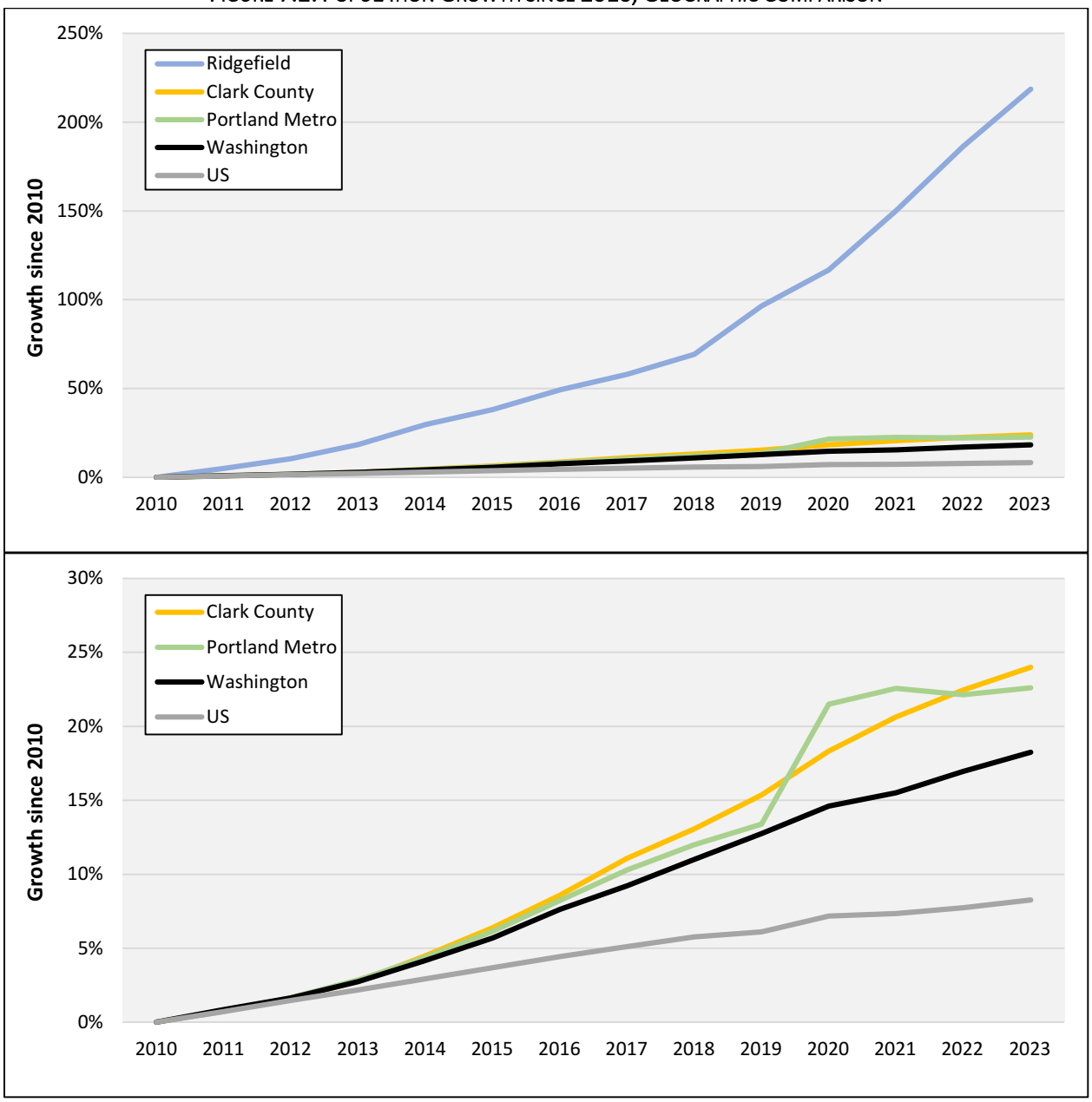


SOURCE: Clark County, JOHNSON ECONOMICS

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

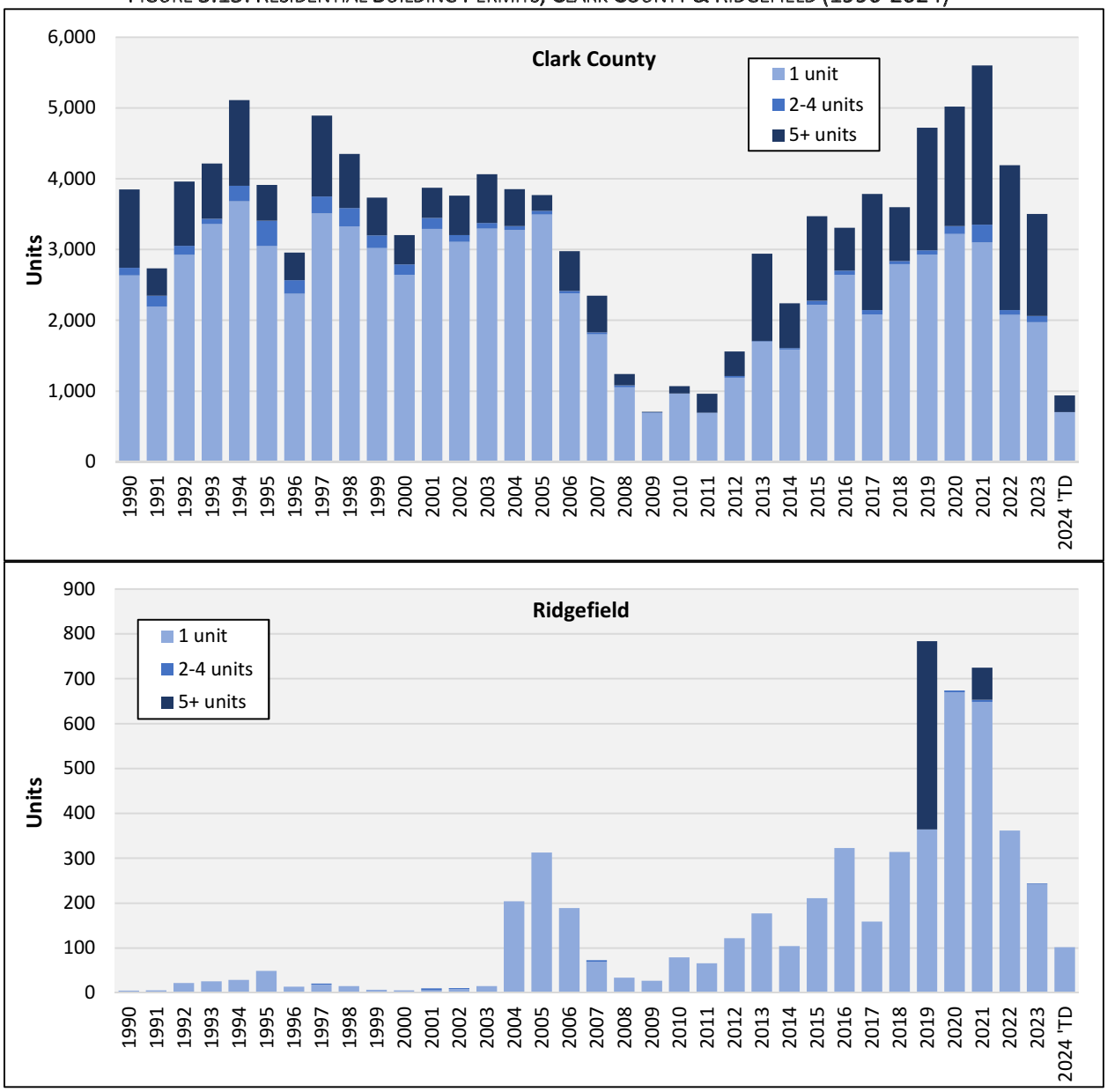


SOURCE: U.S. Census Bureau, Portland State University, WA Office of Financial Management, Johnson Economics

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.

Appendix "C"

THE CITY OF RIDGEFIELD

230 Pioneer Street | P.O. Box 608 | Ridgefield, WA 98642

October 29, 2024

To Clark County Community Planning:

The City of Ridgefield would like to thank Clark County for the opportunity to submit the following information related to two site-specific property owner requests for expansion of the Ridgefield Urban Growth Area as a part of the County's 2025 Comprehensive Plan Update. The City respectfully requests that these revisions to the Ridgefield Urban Growth Area be considered as part of the DEIS process.

I. Maul Property

The City of Ridgefield hereby submits this letter in support of a site-specific request by property owners to revise the Ridgefield Urban Growth Area (IRN 076) to include two Parcels that consist of 11.5 acres currently designated Agricultural Resource land as shown in Figure 1 below (the Maul Property, Parcels #216473000 and #216491000). The City supports consideration of this request for a number of reasons as detailed below.



Figure 1.



Figure 2.

A. *Agricultural De-Designation*

Historically, from 1979 to 1994 the property was split-zoned into both residential and agricultural zones and since at least that time the land appears to have been a mix of residential use and significant tree cover. See Figure 2. There is no evidence during this time of significant agricultural use of the property. The Maul Property parcels were added to the Ridgefield UGA during the 2007 Clark County Comprehensive Plan Update, whereby several areas were de-designated from Agricultural Resource to be added to urban growth areas in the County. That decision was appealed and ultimately invalidated by the GMHB, but not before the City had lawfully annexed the remaining parcels within the UGA into the Ridgefield City limits in 2008.

It is unclear why the Maul properties were not included in the annexation. The City received several annexation applications for processing and had the authority to geographically modify those annexations to avoid the creation of the Maul property island. It appears to have been an oversight on behalf of the City at

that time that has led to the isolated island of Ag Resource property within the Ridgefield UGA area. These annexations were upheld by the courts during the appeal, resulting in the County leaving the surrounding annexed parcels in the Ridgefield UGA, but returning the two Maul parcels to the Agricultural Resource designation because they were not annexed.

The City's oversight and subsequent urban development of the surrounding properties that were annexed have resulted in the Maul property now being completely surrounded by urban growth. The City believes the properties meet the criteria for de-designation as Ag land because intervening development patterns surrounding the property have exacerbated the City's error.

In the intervening years since the land was originally designated Ag Resource in 2004, changed circumstances and development patterns suggest the County should revisit the character of the property and in the City's analysis warrant a change to the designation of the property from Ag Resource to inclusion in the Ridgefield UGA under WAC 365-190-050 and WAC 365-196-310.

Significant factors include the following:

(1) The land is characterized by urban growth. Previously the adjacent land that was within the UGA was not developed; however, at this time the property surrounding the Maul property on all sides is characterized by urban growth that utilize urban governmental services. The parcels to the south are within the City limits and are developing as a single-family residential subdivision (Sanderling Park; two of seven approved phases are built). The parcels to the west are within the City limits and developed as the Ridgefield School District's View Ridge Middle School/Sunset Ridge Intermediate School complex. The parcels to the north and east are in the Carty Road Subarea and are designated Urban Low (UL) in the 2016-2035 Ridgefield Urban Area Comprehensive Plan. Three of the four parcels immediately adjacent to the north and east boundary of the Maul property are within the City limits zoned Residential Low Density 4, while the fourth is within the UGA. Additionally, the property is adjacent to public services that are available to serve the property. Finally, the property is located at the intersection of two arterial urban streets with significant urban vehicle traffic as well as significant pedestrian traffic to and from the adjacent schools.

(2) The land is not practically viable for agricultural production. Based on the size and location of the parcel, and the factors as set forth in the materials submitted by the property owner, the property is not able to be farmed productively.

(3) The property is not viable for long term commercial significance for agricultural production under the 10 factors set forth in WAC 365-190-050(3)(c). The history of adjacent land development, intensity of nearby urban uses and their incompatibility with agricultural practices, and proximity on all sides to the Ridgefield urban growth area are all changed circumstances that warrant approval of the property owner's request to change from Ag Resource to Ridgefield UGA.

(4) The property meets the criteria for urban growth areas set forth in WAC 365-196-310 because the property is adjacent to territory already characterized by urban growth with existing and planned

public facilities with capacity to serve the development and is necessary to meet the projected urban growth planning projections (see Subsection B – Land Use Analysis).

Because the City erroneously failed to include the Maul properties within the 2008 annexations, the resulting urban development on all sides in the intervening 20 years have led to an island of 11.5 acres of agriculturally designated land within a completely urbanized area. This relatively small acreage has not been utilized for commercial agricultural production in at least the last 50 years.

B. *Land Use Analysis*

The property owner has indicated to City staff that, upon inclusion in the UGA, they intend to develop a portion of the property with multi-phase senior living, including independent living apartments, assisted living, and nursing care.

The remainder of the property is under consideration as a fire station serving the growing needs of Clark Cowlitz Fire Rescue.

To accommodate these future uses, the City's land use model for the 2025-2045 Comprehensive Plan Update assumes that half of the Maul property will be designated Medium Density with the Ridgefield Mixed Use overlay, and half of the property will be designated Public Facilities.

Under this assumption, the property would accommodate up to 72 independent senior housing units, 58 of which would be affordable to households making less than 80% of area median income. This would contribute toward solving Ridgefield's 2,652-unit deficit in affordable housing over the next twenty years, in an area already characterized by urban growth. Under this assumption, the property would also accommodate 6 jobs.

The property owner will be submitting additional evidence to support de-designation. Based on the preceding analysis and the property owner's analysis, the City supports consideration of the site-specific request to include the Maul property within the Ridgefield UGA.

II. Zimmerly Property

The City of Ridgefield hereby submits this letter in support of a site-specific request by property owners to revise the Ridgefield Urban Growth Area (IRN 092) to include sixteen Parcels that consist of approximately 200 acres currently designated Agricultural Resource land as shown in Figure 3 (the Zimmerly Property). The City supports consideration of this request for a number of reasons as detailed below.



Figure 3.

As set forth in the materials submitted by the property owners, the Zimmerly Property meets the criteria for the change in designation from Ag Land and the criteria for inclusion into the Ridgefield UGA for mixed residential, commercial, and employment uses. Importantly the property is adjacent to the Ridgefield city limits on the west, south, and east, with existing residential development on the west, residential and more intensive commercial development existing on the south, and a developing employment zone on the east. It is adjacent to the I-5 corridor and is further designated as an area planned for non-residential expansion into the City's urban growth area by its inclusion in the County Urban Reserve 20 overlay.

The property is furthermore necessary to accommodate the planned growth based on the planning allocations adopted by the County earlier this year. The City is expected to grow by over 10,600 to over 27,200 in the next 20 years. The City is required to plan for 5,815 new housing units and 8,175 new jobs over that same period. While Ridgefield has capacity to accommodate the total housing and jobs allocations in the existing UGA under existing land use designations, it lacks capacity to accommodate housing affordable across different income bands as required under HB 1220. Specifically, over the 20-year planning horizon Ridgefield is facing a 2,652-unit deficit in capacity for homes affordable to households earning less than 80 percent of the area median income. The City has taken dramatic steps to increase residential density, and has, to date, developed in excess of the 6 units per acre required in the 2016-2035 Comprehensive Plan. However, as a traditionally bedroom community, the City still lacks the requisite space to accommodate the affordable housing allocations and will need to use a combination of strategies including UGA expansion to do so.

Under the existing Industrial Urban Reserve overlay, the Zimmerly properties are already poised for job creation. By adding a mixed-use overlay, these properties would also make a significant contribution to cutting Ridgefield's affordable housing deficit.

To this end, the City's land use model for the 2025-2045 Comprehensive Plan Update assumes that the Zimmerly property will be designated Employment with the Ridgefield Mixed Use Overlay. Under this assumption, the property would accommodate up to 1,250 housing units, 1,000 of which would be affordable to households making less than 80% of area median income. This would contribute toward solving Ridgefield's 2,652-unit deficit in affordable housing over the next twenty years, in an area already characterized by urban growth. Under this assumption, the property would also accommodate 959 jobs.

Finally, a key consideration for the City's support for this change in designation is the changing development patterns of this area in light of the casino complex with urban entertainment uses on property north of the subject properties. The Cowlitz Tribe has indicated an intent to expand to the south in a manner that would include not only the property to the north, but also the property subject to this request. If placed in the federal land trust for additional tribal developments, the property will be removed from state jurisdiction and the planning goals of the GMA entirely. In the 2007 appeal of the County comprehensive plan update, the courts noted that any casino development was speculative in considering an expansion of the La Center UGA:

> "*Allowing the County to begin developing the land in 2007 based on the Cowlitz Tribe's speculative development plans, which could take years to overcome multiple legal hurdles, could have resulted in the inappropriate conversion of agricultural land pursuant to the GMA if the Cowlitz Tribe's speculative*

> *development plans fell through. Perhaps in the future, the circumstances of the land will have changed such that the land in and around parcel LB–2 no longer qualifies as ALLTCS under the Lewis County test.*"

Clark County v. WWGMHB, 161 Wn. App. 204, 243 (2011). The City of Ridgefield asserts that the circumstances of land have changed. In the intervening years, that speculation has come to pass—the federal lands were developed with urban uses, but without the urban public facilities that the GMA would have required. Further expansion and urbanized development is much more likely. The City would like to assure that future urbanization occurs closer to existing public facilities and that future growth in this area is planned consistent with goals of the GMA.

WAC 365-196-310 (4)(c)(iii) sets forth the criteria for identifying the location of new lands to be added to the urban growth area:

> (A) Existing incorporated areas;
>
> (B) Land that is already characterized by urban growth and has adequate public facilities and services;
>
> (C) Land already characterized by urban growth, but requiring additional public facilities and urban services; and
>
> (D) Lands adjacent to the above, but not meeting those criteria.

Here due to the location of the casino and associated development on federal tribal lands and the location of the City's key commercial corridor at the northern city limits abutting the I-5 corridor, this property is uniquely situated adjacent to both existing urban incorporated areas and area that is already characterized by urban growth to the north.

The factors set forth in the property owners' materials, together with the urban development of federal tribal land nearby and its expected expansion, the city's recent commercial development, and the State's changed planning projections, all support the requested change in designation. The City supports consideration of the site-specific request to include this property within the Ridgefield UGA.

On the basis of the foregoing arguments, the City believes that both of these applications can meet the criteria for inclusion into the Ridgefield UGA and would be instrumental in helping the City of Ridgefield plan adequately for future growth. Thank you for your consideration.

Sincerely,

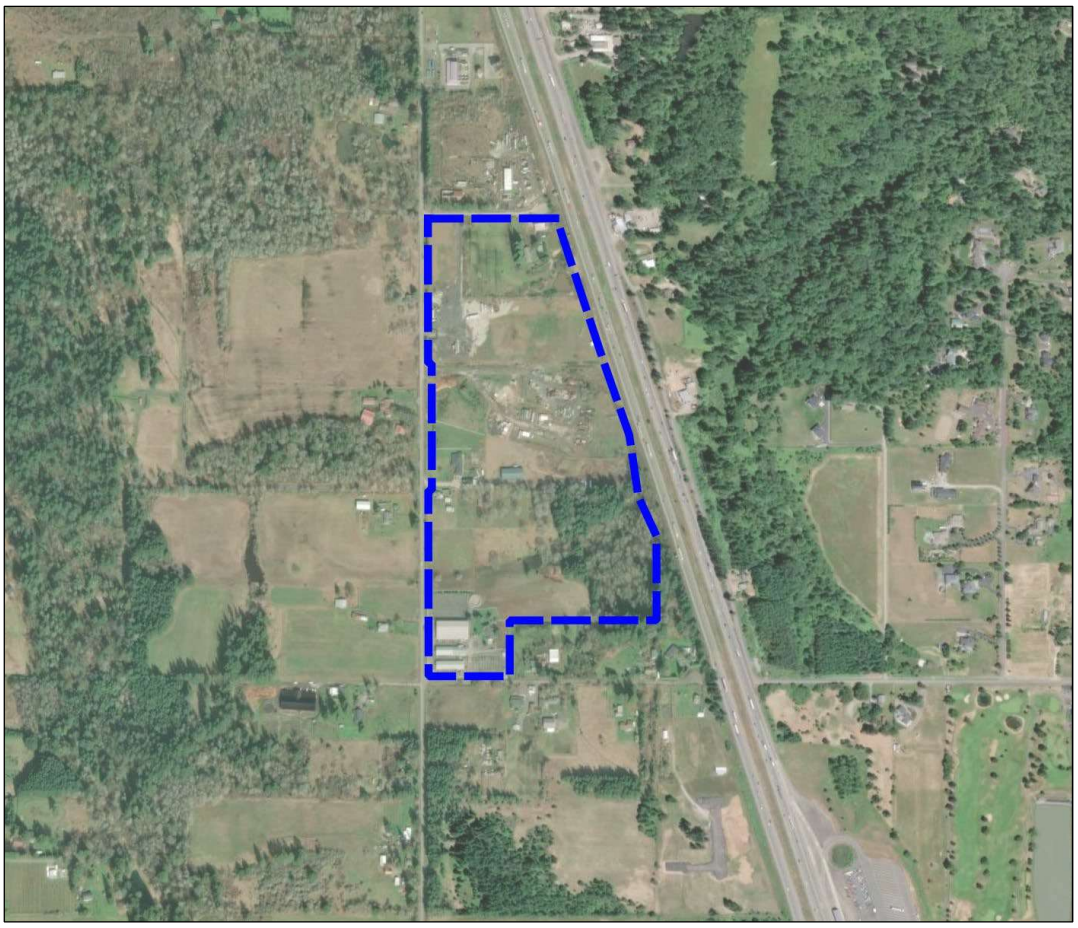
Claire Lust

Claire Lust, Community Development Director

Appendix "D"

Appendix "D"

JOHNSON ECONOMICS



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

PREPARED FOR
MIKE PAULETTO
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 2
IV. CHARACTERIZATION OF URBAN GROWTH 5
V. CURRENT AGRICULTURAL PRODUCTION 8
VI. COMMERCIAL SIGNIFICANCE FOR AGRICULTURE 9
LAND CAPABILITY CLASSIFICATION 9
WATER RESOURCES 10
AVAILABILITY OF PUBLIC FACILITIES 11
AVAILABILITY OF PUBLIC SERVICES 11
TAX STATUS 12
PROXIMITY TO URBAN GROWTH AREAS 13
PARCEL SIZE 13
LAND USE PATTERNS & INTENSITY OF SURROUNDING LAND USE 13
HISTORY OF PERMITS ISSUED NEARBY 13
LAND VALUES UNDER ALTERNATIVE USES 14
PROXIMITY OF MARKETS 15
AGRICULTURAL PRODUCTIVITY 15
VII. THE STATE OF AGRICULTURE IN CLARK COUNTY 17
POPULATION & DEVELOPMENT TRENDS 19
VIII. RECOMMENDATIONS 21

I. INTRODUCTION

JOHNSON ECONOMICS was retained by MIKE PAULETTO 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 450 new homes are in the planning process 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 three miles and the nearest hospital is about nine 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 holds a consumptive water certificate that allows for irrigating 10 acres, but this is much smaller than the full property size. The productivity of most potential farm operations is below a profitable level.

The property is designated partially as agricultural land and partially as open space land under the Current Use program, a tax deferment that reduces the taxable value of each parcel. The total assessed fair market value of land in the parcels is almost $2.5 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.

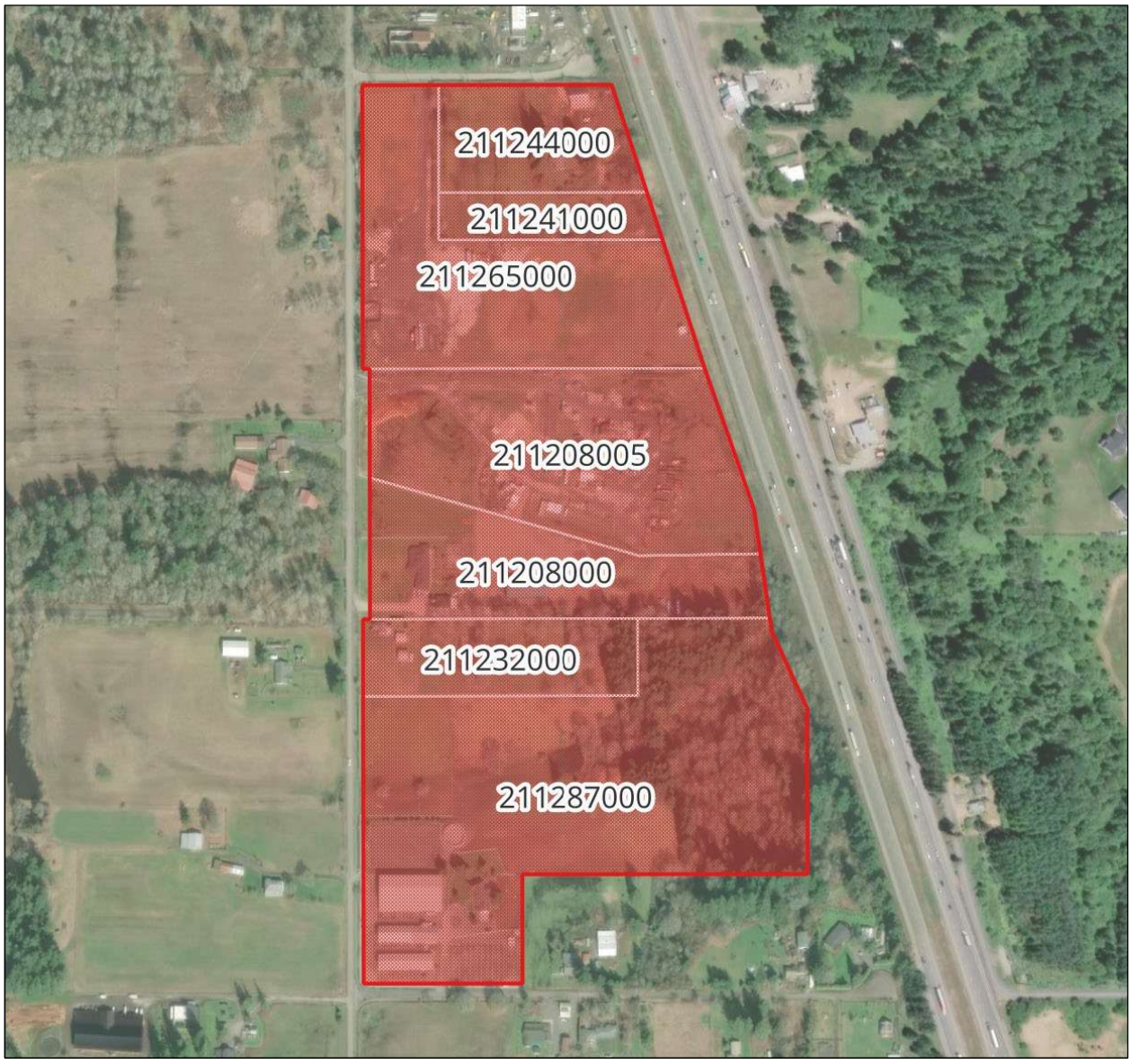
La Center is also trending towards more residential and commercial use and less agricultural use. From 2010 to 2022, the city's population increased by almost 40%, and over 800 new residential units (650 single-family homes) were permitted. Furthermore, over 60,000 square feet of commercial and lodging 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 seven parcels that total 57.9 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 seven parcels that make up the subject property are owned by four different property owners. The three parcels on the north side of the property, parcels 211244000, 211241000, and 211265000. Parcel 211244000 includes a home built in the 1960s and a barn. All three are designated as Open Space Land under Clark County's Current Use tax program. The two middle parcels, 211208000 and 211208005, are currently used for landscape and equipment

storage. There is also a small area, about a quarter of an acre, of non-commercial farming. The next parcel, 211232000, includes a home and a few additional buildings. On the southernmost parcel is Emerson Equestrian, a horse boarding/training facility. This parcel is designated as agricultural land under Clark County's Current Use tax program.

The agricultural history of the subject property is somewhat unknown. According to the current property owners, the site has been hayed and used for grazing cattle in the past. Parts of the property do appear to have been hayed during the 1990s and early 2000s, according to satellite imagery. Similarly, the southernmost parcel appears to have been used for equestrian activities as early as 2009. From 2022 to 2024, two liens were filed against parcel 211265000 for commercial vehicle storage in the agricultural zoning district; these have since been released.

The images below show the street view of the subject property along Northwest 31st Ave. The first image is of the Open Space designated parcels, the second is of the landscaping business, and the last is of the horse boarding/training facility.

FIGURE 3.2: STREET VIEW OF SUBJECT PROPERTY, 2019





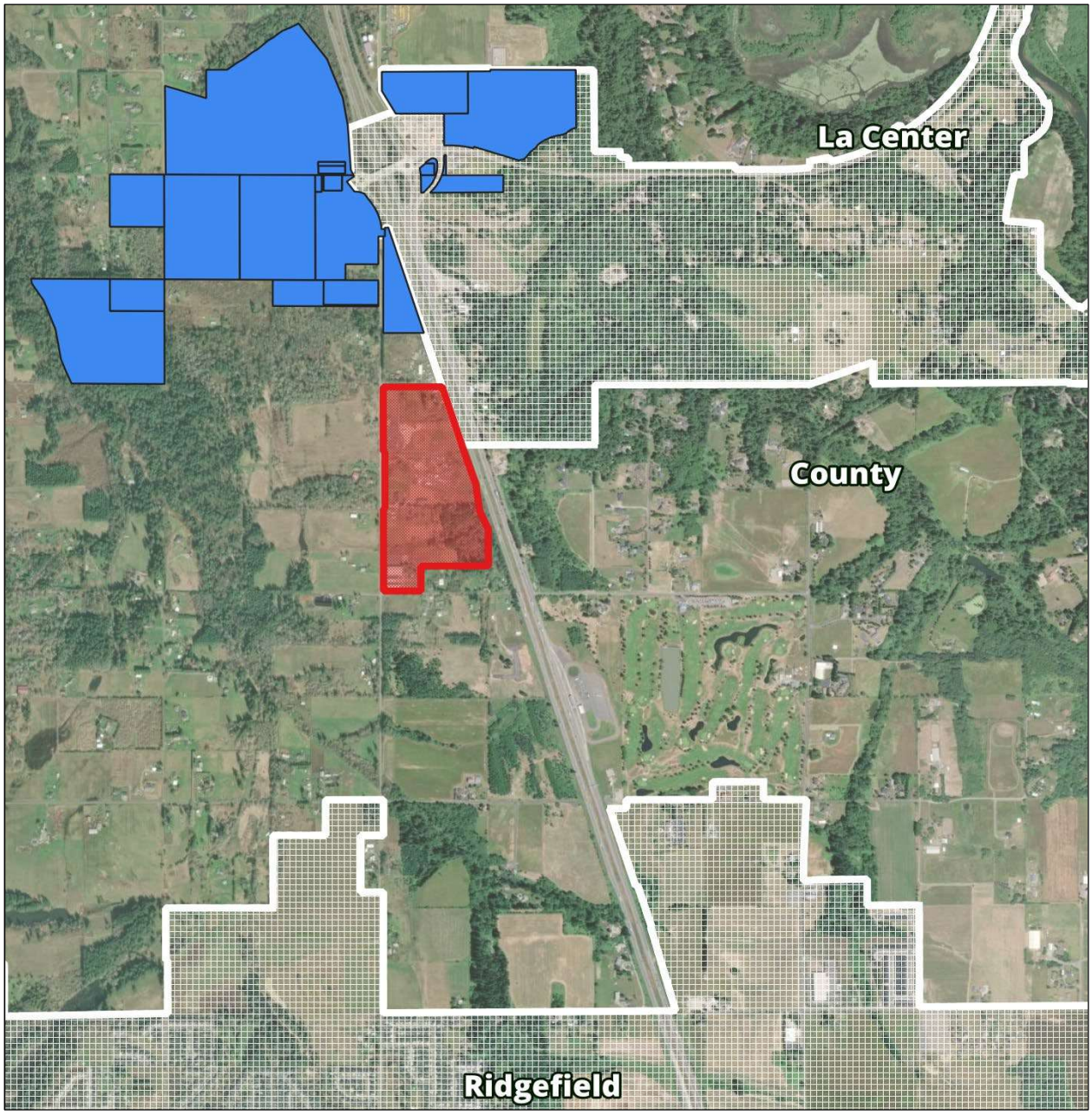
SOURCE: Google Earth, JOHNSON ECONOMICS

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. This includes land used primarily for "equestrian-related activities," according to Clark County. The 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 La Center Urban Growth Boundary to the east. Ridgefield's UGB is about half a mile 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 northwest 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.

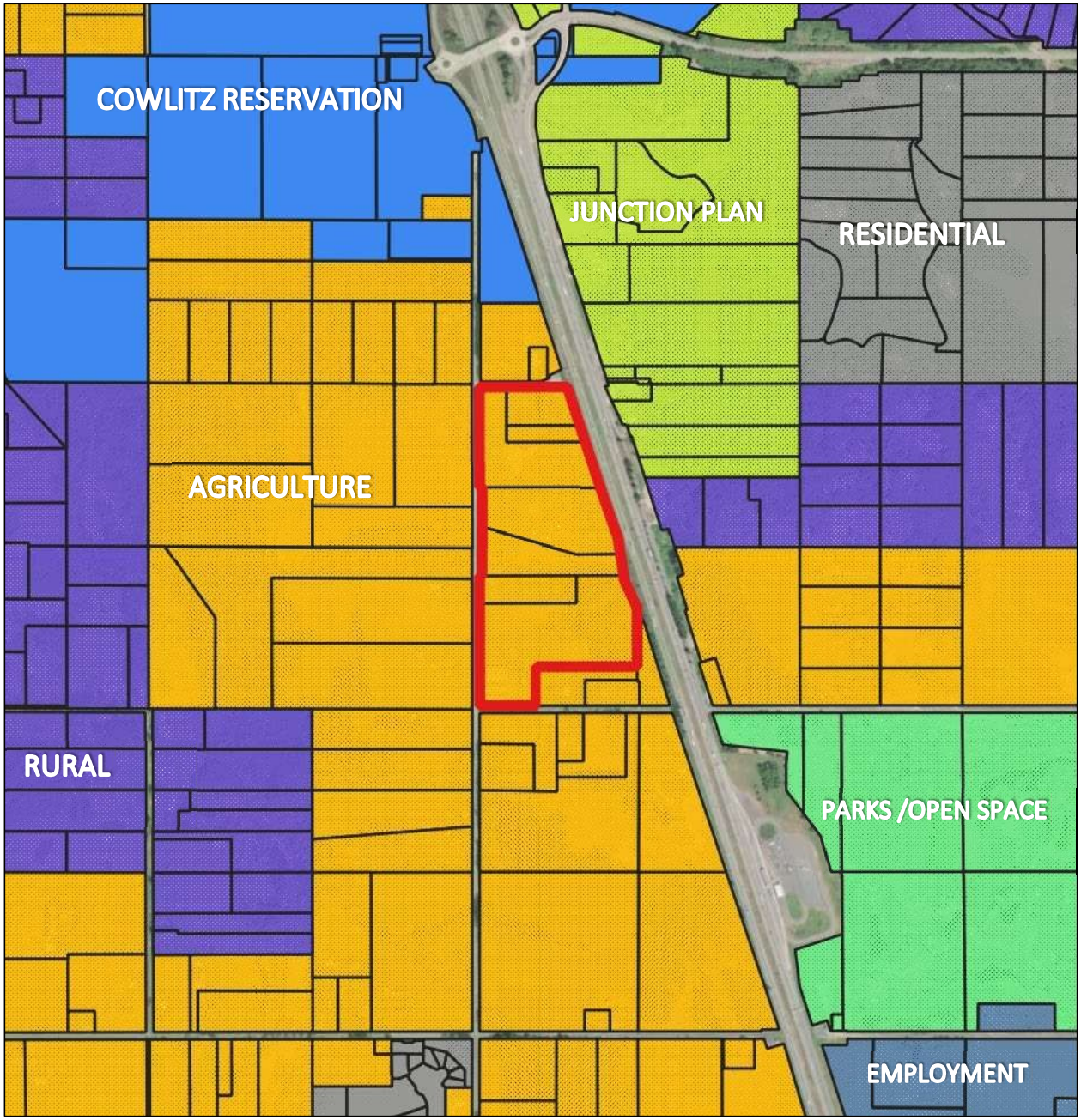
FIGURE 4.1: LA CENTER AND RIDGEFIELD URBAN GROWTH BOUNDARIES, TRIBAL AND TRUST PROPERTY, 2022



SOURCE: Clark County, JOHNSON ECONOMICS

The subject property is zoned for agricultural use. Agricultural zoning continues to the north, west, and south of the property. Farther north is the Cowlitz Tribe Reservation, which is expanding south towards the subject property and east into the City of La Center. The land to the east is rural and residential. There is also a section just northeast of the subject property that falls under the La Center Junction Plan, which is intended to promote commercial, employment, and residential mixed-use development.

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

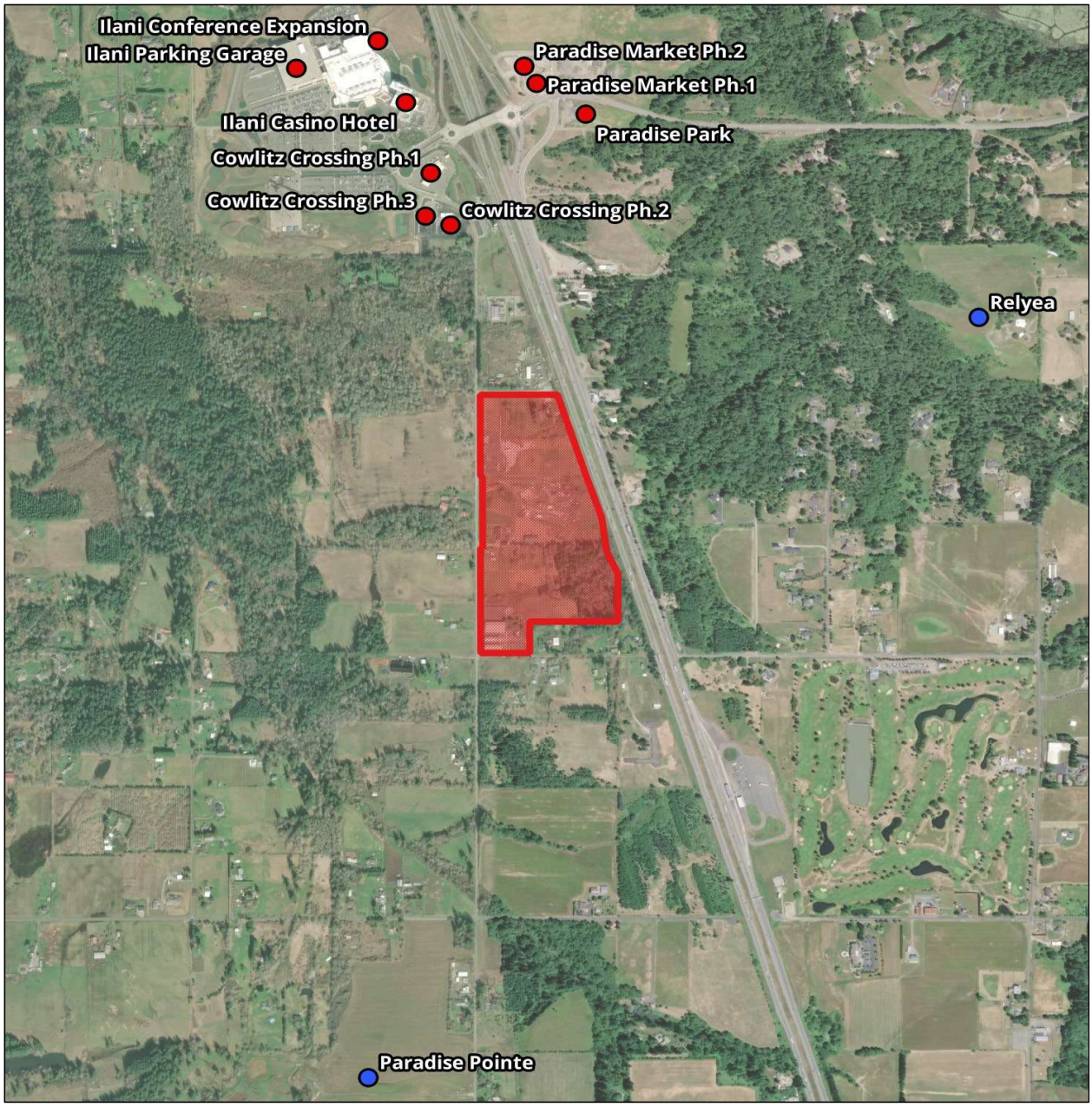


SOURCE: Clark County, JOHNSON ECONOMICS

Within a mile of the subject property, there is one subdivision under construction and one in the planning process. Paradise Pointe in Ridgefield (in some planning documents as Paradise Found) to the west of the subject site will add 296 homes once completed. To the east is Relyea Subdivision, which has been proposed with 160 homes.

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 20-acre horse riding school is the only parcel in agricultural use at the subject property. The parcels with landscaping and equipment storage have about a quarter of an acre of berries and grapes, but those are not grown for commercial purposes.

FIGURE 5.1: STREET VIEW OF HORSE-RIDING SCHOOL, 2019



SOURCE: Google Earth, JOHNSON ECONOMICS

Within half a mile of the subject site, there are a few small farms. Immediately to the west is Northwood Stables, and south of that is Greene Jungle Farm, a small family farm that raises animals on pasture and farms a variety of produce. Millennium Farms to the east produces fruit, vegetables, and herb starts. To the south is a defunct tree farm, and several other Current Use-designated agricultural parcels 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 and on the west side, is Sara silt loam (SlB and SlD), both 0-8 percent slopes and 8-20 percent slopes. There are also some areas of Gee silt loam soils (GeB and GeD) and Puyallup fine sandy loam (PuA). These soils are considered Class II, III, and IV, which, according to the Clark County Assessor, are suitable for some crops and pasture. Parts of the north and south sides are Cove silty clay loam (CvA), which is Class V, and there is a large central area of Odne silt loam (OdB), which is Class VI; these are generally not suitable for crops. The small area marked with a W indicates water.

FIGURE 6.1: USDA SOIL CLASSIFICATION, 2024



SOURCE: USDA Web Soil Survey, JOHNSON ECONOMICS

WATER RESOURCES

The subject property has one groundwater claim of record and one water right certificate. At a high level, the acreage that may be legally irrigated on the subject property (10 acres) constitutes a small portion of the entire subject property.

A water right certificate is a vested property interest, and it confirms that water appropriation under the terms set forth in the certificate was perfected in accordance with RCW 90.03. RCW 90.03.330. On the other hand, a water right claim is not a water "right." See generally RCW 90.14. While a water right claim holder can continue to use water under a claim, a claim is not a vested right until it is confirmed through a judicial adjudication process. RCW 90.14.081. A judicial process may result in the claim being confirmed, or it may result in the claim being denied in whole or in part.

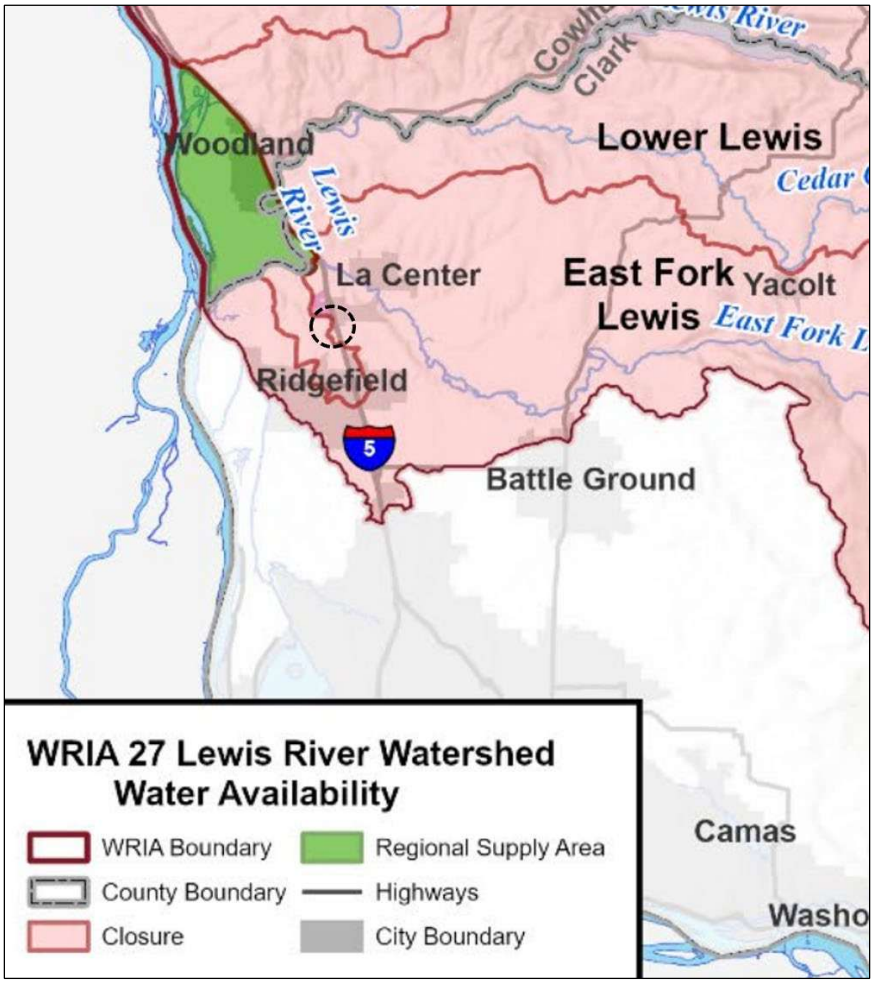
The entire place of use for the groundwater right claim is located on Parcel 211232000, and authorizes water use for domestic purposes. Note that while it is classified as a "domestic general" claim and it does not claim any irrigation, the claim form does claim water for "home and acreage." It is not clear how a judge would interpret a claim to water for "acreage" in an adjudication process. However, based on the fact that the claimant did not claim a specific amount of acreage, a judge could find that no irrigation is authorized under the claim. Per the information in its online database, the Washington State Department of Ecology ("Ecology") does not recognize irrigation use under this claim.

The subject property is also covered by a water right certificate: G2-21440CWRIS. The groundwater certificate has a priority date of September 7th, 1973. It authorizes 10 acres of primary irrigation as well as domestic single use year-round. Specifically, the certificate authorizes a rate of 50 gallons per minutes ("gpm") in an amount of up to 21 acre-feet ("AF") per year. The source for this water right is a groundwater well.

As noted above, our review shows that only 10 acres of the entire subject property is certainly authorized for irrigation. If the owner of the subject property wanted to secure a new water right for the property, it would need to consider some of the notable challenges associated with securing a new water right at this location. In Washington State, use of waters of the state for irrigation is not an exempt use of water. As such, the owner of the subject property would need to secure a new water right though a legal administrative channel in order to use water for this purpose on the subject property in an amount beyond the amount authorized on the certificate. 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. 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. The final option to obtain a more robust irrigation supply for the subject property would be to transfer a water right certificate that is not subject to relinquishment to the subject property. Such a transfer will still be subject to the WRIA 27 rules, and it would be prohibited from impairing instream flows. WAC 173-528-060. 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 of the Lower Lewis River Subbasin pursuant to WAC 173-527-110.

As a final note, it is impossible to predict the outcome of an administrative process to apply for a new water right or transfer an existing water right. However, a prospective applicant for either of these two processes on the subject property should be aware of the limitations discussed here.

FIGURE 6.2: LEWIS RIVER WATERSHED WATER AVAILABILITY, 2023



SOURCE: WA Department of Ecology

AVAILABILITY OF PUBLIC FACILITIES

To the west of the subject property is Northwest 31st Avenue, which has two travel lanes, each about 11 feet wide. These are separated by a double yellow line or a broken yellow center line. There are no bike lanes or sidewalks. The posted speed limit is 40 miles per hour, and the closest intersection, Northwest 299th Street and Northwest 31st Avenue on the southwest corner, is controlled with one stop sign on Northwest 299th Street.

The subject property is currently under the jurisdiction of the Rural/Resource Sewer District, and about 1.5 miles southwest 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

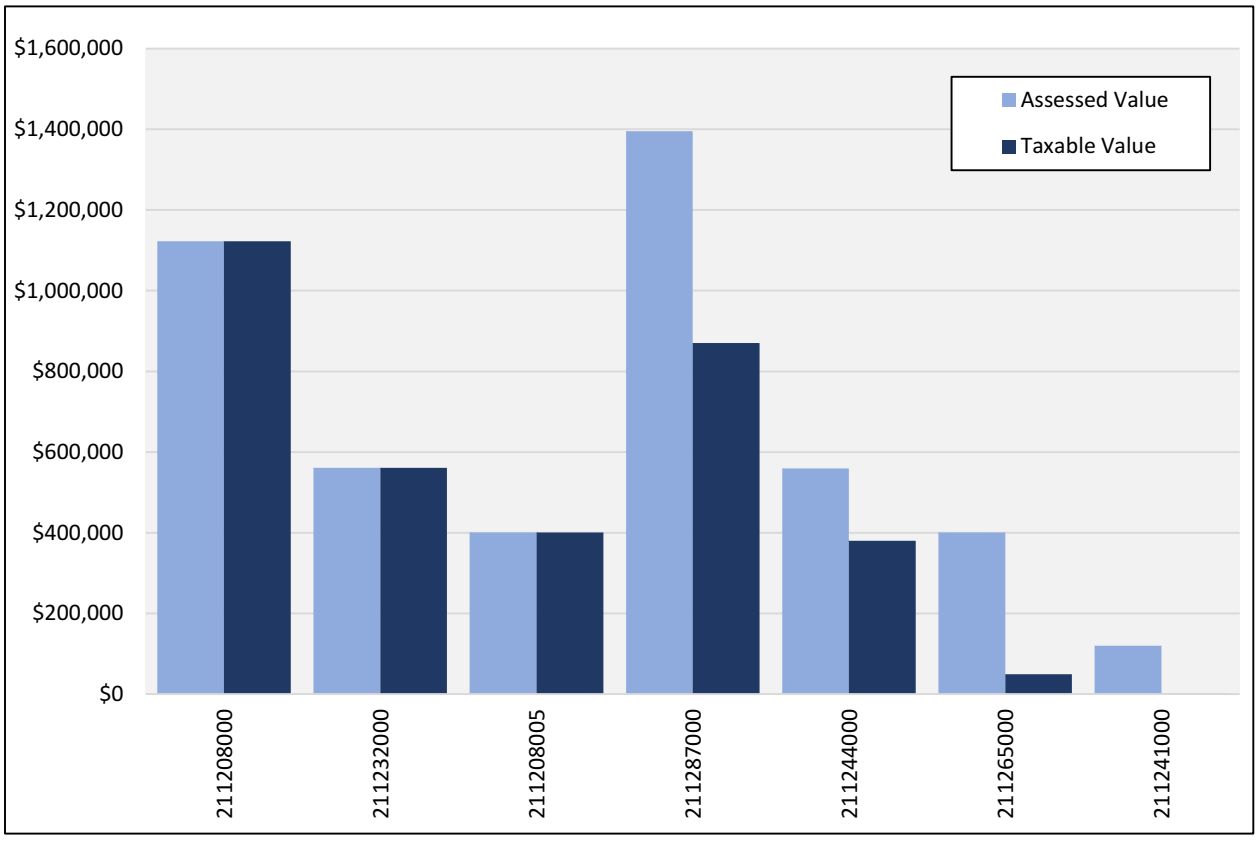
The subject property is about a mile and a half northwest of the Clark-Cowlitz Fire Rescue Station 21, within the Clark-Cowlitz Fire District. It is about two and half miles southwest of the La Center Police Department. The nearest medical center with an emergency department is Legacy Salmon Creek Medical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

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

Tax Status

Four out of the seven parcels that make up the subject property are designated under the Current Use program as agricultural or open space 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



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 most applicable definition of open space land under Current Use is:

> "any land that meets the definition of farm and agricultural conservation land. 'Farm and agricultural conservation land' is either; (i) land that was previously classified as farm and agricultural land under RCW 84.34.020(2) that no longer meets the criteria and is reclassified as open space under RCW 84.34.020(1); or (ii) land that is traditional farmland that is not classified under chapter 84.33 or 84.34 RCW, that has not been irrevocably devoted to a use inconsistent" (RCW Chapter 84.34 and 84.33).

While the agricultural and open space parcels currently meet these requirements, if the parcels are sold for non-agricultural use, they will need to be withdrawn from the program. According to Clark County Assessor records, the parcels have been designated under Current Use since at least 2006, so removing them from the program would incur only back taxes and interest and no additional penalties. Upon withdrawal from Current Use, we estimate the additional back taxes plus interest to total around $131,000.

Proximity to Urban Growth Areas

The subject property is adjacent to the Ridgefield Urban Growth Boundary. It is within one mile of two residential projects that were under construction or in the planning process, which will add over 450 new homes once complete.

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. The closest part of this land is less than 0.2 miles from the subject property. This demonstrates proximity to urban growth areas.

Parcel Size

The largest parcel, which is the only one in agricultural use, is 20 acres. The parcels with landscape and equipment storage are 6.7 and 10.9 acres, the open space parcels are 2 to 10 acres, and the small parcel with a home is 4 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 north and south range from 1-69 acres; parcels at the subject property fall within this range.

Land Use Patterns & Intensity of Surrounding Land Use

There are a few small farms to the south, east, and west of the subject property. To the north is the Cowlitz Tribe reservation, which contains the Ilani Casino and several small commercial buildings. Tribal land less than 0.2 miles north of the property is intended for future commercial development. 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 east and south, inside the Ridgefield UGA. As the nearby cities grow, new residential subdivisions will move towards the current UGA boundary and potentially even adjoin 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, one subdivision permit has been issued within one mile of the subject property. Paradise Pointe in Ridgefield (in some planning documents as Paradise Found) will add 296 new homes to the area. Relyea Subdivision is pre-application, with 160 units proposed. 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	Paradise Found/Paradise Pointe	N 11th-13th; 35th-Royle Rd	Single-Family	Under Constr.	2024	296
Total Residential Units						***456***

#	Project Name	Address	Type	Status	Permit Year	SF
3	Paradise Market Ph 1	32022 NW Paradise Park Rd	Commercial	Complete	2019	4,500
4	Paradise Market Ph 2	32022 NW Paradise Park Rd	Commercial/lodging	Complete	2019	81,900
5	Ilani Casino Parking Garage	1 Cowlitz Way	Lodging	Complete	2020	978,000
6	Ilani Casino Hotel	1 Cowlitz Way	Lodging	Complete	2022	250,000
7	Ilani Conference Expansion	1 Cowlitz Way	Lodging	Complete	2023	14,300
8	Cowlitz Crossing Ph 1	31801 NW 31st Ave	Commercial	Complete	2019	5,500
9	Cowlitz Crossing Ph 2	31420 NW 31st Ave	Commercial	Complete	2022	5,000
10	Cowlitz Crossing Ph 3	31420 NW 31st Ave	Commercial	Under Constr.	2023	4,500
11	Paradise Park	NW Paradise Park Rd/La Center Rd	Commercial/lodging	Land Use Review	N/A	58,100
Total SF						***1,401,800***

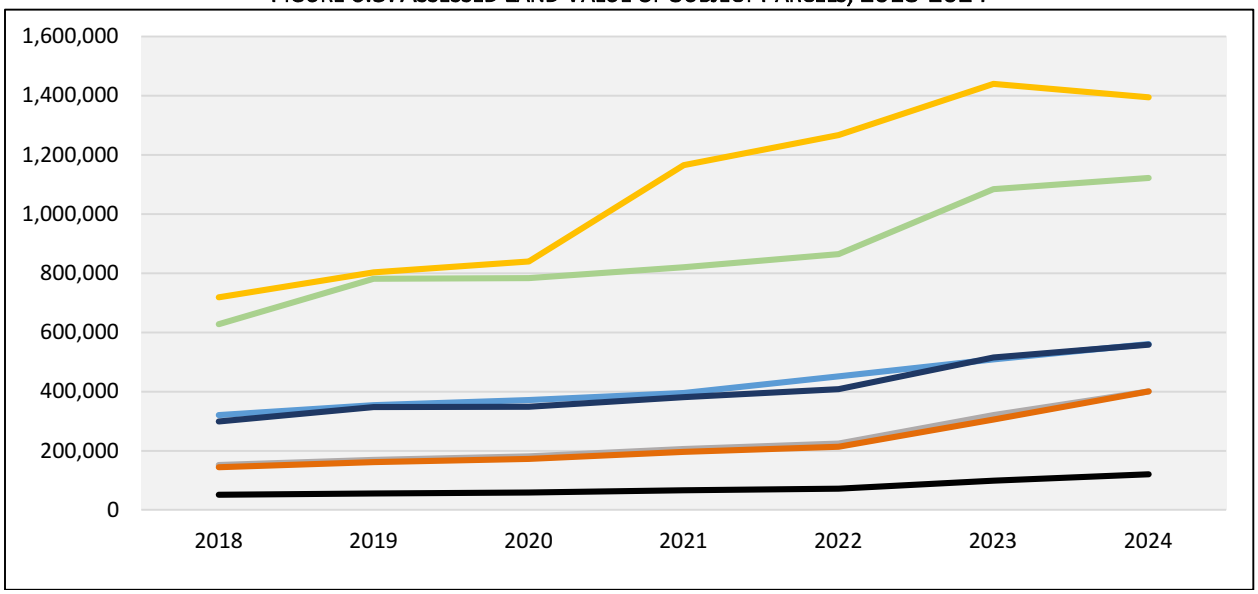
SOURCE: CoStar, Ridgefield Planning Department, Google Earth, local media, JOHNSON ECONOMICS

LAND VALUES UNDER ALTERNATIVE USES

Four parcels are designated under Current Use as Open Space or Farm & Agriculture land. These parcels have assessed values of $120,000 to $1,400,000, while their taxable values range from $722 to $870,000. Per parcel, on average, these taxable values are 27% of assessed values. The three other parcels are taxed at their market values, which range from $400,000 to $1,120,000.

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 75-180%.

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



SOURCE: Clark County Assessor, JOHNSON ECONOMICS

PROXIMITY OF MARKETS

Horse boarding/training requires land area that is less available in areas heavily characterized by urban growth, such as the Portland Metro Area. As such, the market for horse boarding/training can be geographically large. The closest horse boarding to downtown Portland is 13.7 miles, or a 21-minute drive if roads are clear. Emerson Equestrian at the subject property is 25.2 miles from downtown Portland, which is about 32 minutes with clear roads, and about 17.6 miles from downtown Vancouver, or a 20-minute drive. Given this, we estimate the market proximity to be 20 to 25 miles.

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

The USDA does not estimate budgets for equine operations, and the state-specific economic analyses that are available are quite dated. Thus, we will estimate productivity for horse boarding/training in general terms.

The Indiana Agricultural Statistics Service published equine budget estimates for operations with five or more horses most recently in 2001 (Washington and Oregon do not publish equine operations data with the USDA). The average income (revenue) per operation was $15,000, while total expenses were $24,000; this gives a net loss of $9,000. To put this into a larger context, the USDA Net Farm Income Forecast charts total U.S. farm income, expenses, and net income from 2004 to 2024 (forecasted values). From 2004 to 2024, gross income and production expenses each grew by about $1.5 billion from 2004 to 2024, while net farm income remained almost the same across that period. In other words, while revenue and expenses have both increased, farmers are not seeing an increase in their net income, or profit. Anecdotally, farmers in the Ridgefield area have described this phenomenon of rising costs of equipment, labor, and other resources without an increase in profit. It is likely that Emerson Equestrian has experienced this to some degree, even if the facility is making a positive profit. Additionally, with any agricultural operation involving animals comes concerns for mud, odor, and groundwater pollution. These may cause conflicts with nearby residential and commercial areas.

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 higher quality soils and more water than is available. 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 27.5 acres across the entire property that appear useable for haying, aside from Emerson Equestrian, which would add about 8 acres. If we assume exclusive hay production, selling all that is produced, maximum revenue is $35,750 to $42,900 yearly ($46,150 to $55,380 with the Emerson Equestrian parcel). This figure only includes sales and does not consider any costs, which include labor, equipment, land preparation and fertilizer as well as transaction costs. A combination of the horse boarding/training facility and haying may be more profitable than either alone.

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 14 calf-cow pairs could be supported on the subject property (18 with the parcel containing the horse facility). 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.

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 land in the subject property is almost $2.5 million (this excludes the value of all buildings). 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

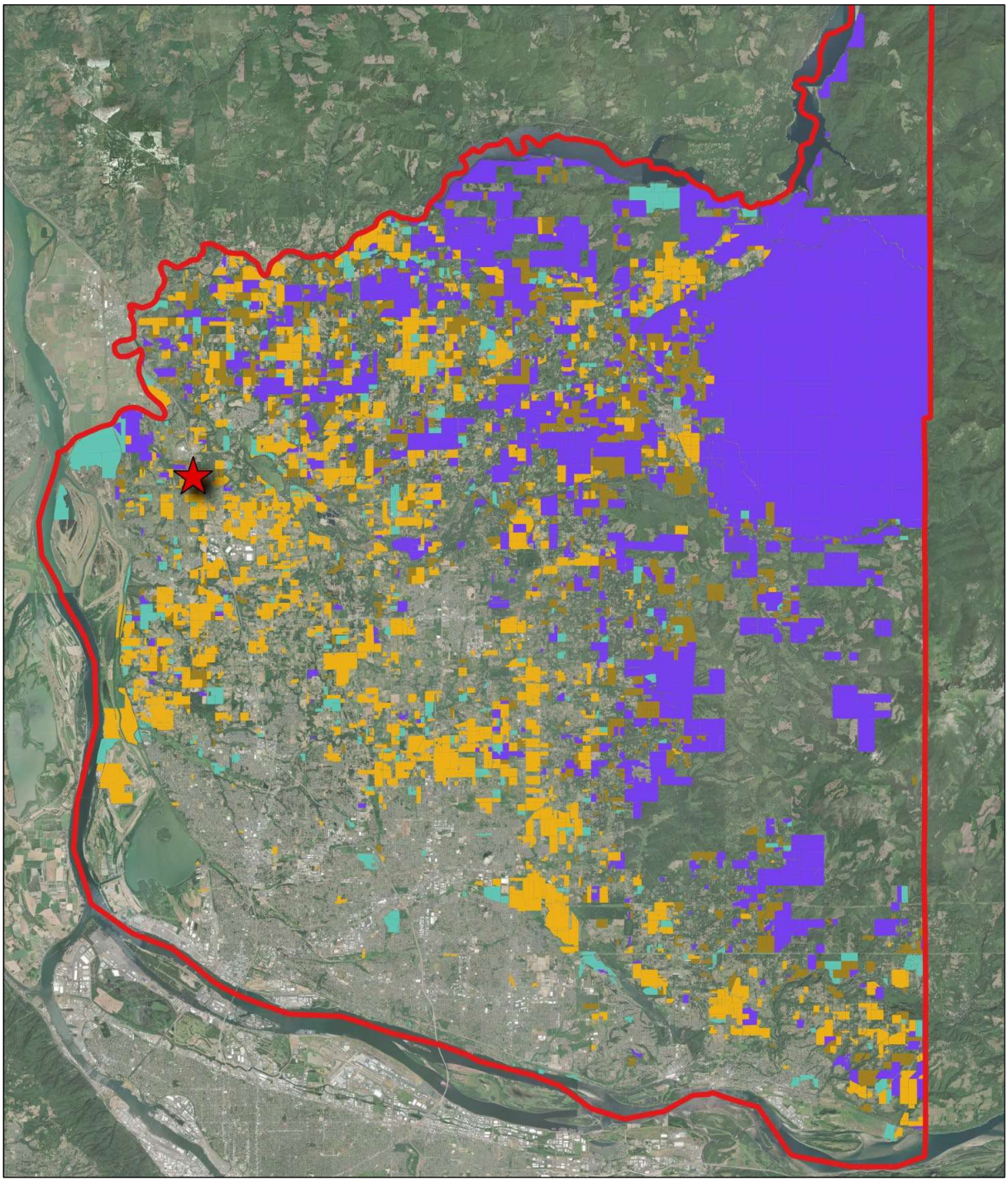
The Washington GMA specifies that a countywide analysis must be conducted in order for cities and counties to de-designate natural resource lands (including agricultural lands) within the county. This Comprehensive Plan is required by the Washington GMA to be updated by the end of 2025, after its last 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 0.05% of the total Current Use designated agricultural land area and 0.2% of the total Current Use designated open space land area in Clark County.

FIGURE 7.1: CLARK COUNTY LAND UNDER CURRENT USE, 2024

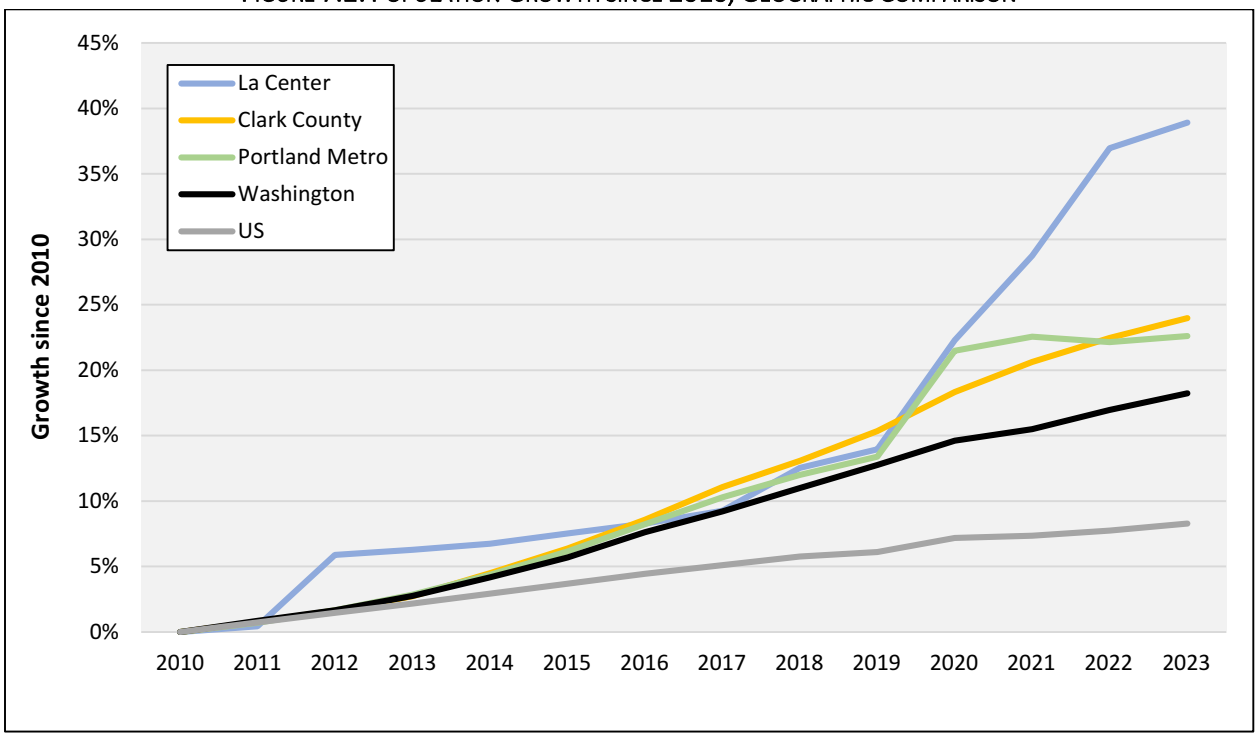


SOURCE: Clark County, JOHNSON ECONOMICS

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, 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

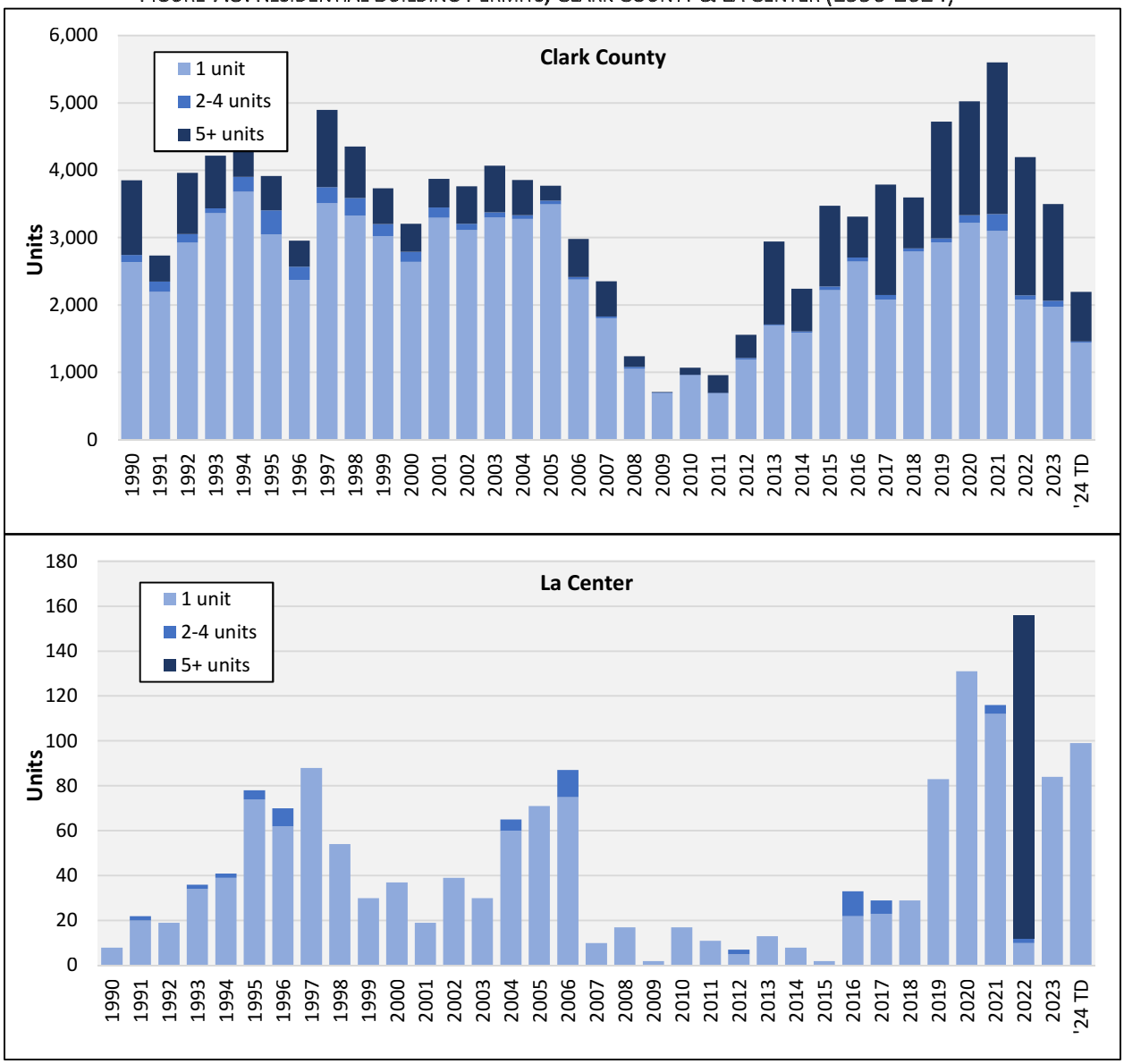


SOURCE: U.S. Census Bureau, Portland State University, WA Office of Financial Management, Johnson Economics

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 or otherwise. Several agricultural parcels around the subject site have also slowed or ceased farming altogether in recent years, including one parcel that was previously a tree farm.

- Most of 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. The horse boarding/training facility, Emerson Equestrian, does have some commercial significance for agriculture in terms of use and potential profit, but over the long term, it is likely that the pressure of urban growth will reduce this commercial significance.