From:	Cnty 2025 Comp Plan
To:	darlene.ferretti@jordanramis.com
Cc:	Oliver Orjiako; Jose Alvarez; "James D. Howsley"; Rebecca Messinger
Subject:	FW: Letter to Clark County re Characterized by Urban Growth
Date:	Thursday, October 1, 2026 4:53:00 PM
Attachments:	image001.png image002.png Letter to County re characterized by Urban Growth 10.1.2026.pdf image003.png image004.png image005.png image006.png

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Hello Darlene,

Thank you very much for submitting Jordan Ramis' comments related to the 2025 Comprehensive Plan update.

Confirming this has been received and will be added to the Comprehensive Plan Index of Record.

Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558

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From: Darlene Ferretti <Darlene.Ferretti@jordanramis.com>
Sent: Thursday, October 1, 2026 4:50 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>
Cc: Sue Marshall <Sue.Marshall@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>; Matt Little <Matt.Little@clark.wa.gov>; Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>; James D. Howsley <jamie.howsley@jordanramis.com>
Subject: Letter to Clark County re Characterized by Urban Growth

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.

Good afternoon,

Please see attached letter dated today from Mr. Howsley. Please confirm receipt.

Thank you,
Darlene

Darlene Ferretti | Legal Assistant
Direct: (503) 598-5551

JORDAN RAMIS

1211 SW Fifth Ave, Suite 2700
Portland OR 97204

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



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JORDAN RAMIS

Jamie D. Howsley
jamie.howsley@jordanramis.com
WA Direct Dial: (360) 567-3913
OR Direct Dial: (503) 598-5503

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

October 1, 2026

VIA EMAIL

Clark County Community Planning
c/o Oliver Orjiako, Community Planning Director
1300 Franklin Street
Vancouver, WA 98660
Email: oliver.orjiako@clark.wa.gov
comp.plan@clark.wa.gov

Re: 2025 Comprehensive Plan Periodic Update – Supplemental Submission in Support of Site-Specific Request: APNs 211244000, 211241000, 211265000, 211208005, and 211208000; Inclusion in City of La Center UGA; AG to Industrial (I) / AG-20 to Light Industrial (IL)

Dear Mr. Orjiako:

I. Introduction

This office represents the owners of five parcels in unincorporated Clark County, identified as Assessor parcel numbers 211244000, 211241000, 211265000, 211208005, and 211208000 (collectively, the "Properties"). On November 15, 2023, we submitted a site-specific request asking Clark County (the "County") to (1) include the Properties in the City of La Center urban growth area ("UGA"); (2) change the Properties' Comprehensive Plan designation from Agriculture (AG) to Industrial (I), with no overlay; and (3) change the Properties' zoning from Agriculture-20 (AG-20) to Light Industrial (IL), with no overlay. That request is attached as Exhibit A.

We submit this letter and the enclosed exhibits to be included in the record as part of that request. They show that the Properties are "characterized by urban growth" under the Growth Management Act, chapter 36.70A RCW. The Properties share a boundary with, or are within a few hundred feet of, the existing La Center UGA, front I-5, are a short distance from existing urban services, and sit in an area that is developing at urban intensity. The following exhibits are enclosed:

- Exhibit A – Site-Specific Request Letter dated November 15, 2023
- Exhibit B – GIS Fact Sheet for the Properties
- Exhibit C – Windshield Surveys, Cities of La Center and Ridgefield (September 14, 2026)
- Exhibit D – Cowlitz Tribe and Affiliates Ownership Map

II. The Properties

The Properties are five contiguous parcels in unincorporated Clark County, just west of Interstate 5 and immediately southwest of the City of La Center UGA. They are bounded by NW 309th Street to the north, I-5 to the east, Brindle Ridge Farms to the south, and NW 31st Avenue to the west. Current and historical aerial images of each parcel, along with maps of the La Center UGA boundary, are included in the GIS Fact Sheet attached as Exhibit B. Each parcel is designated Agriculture (AG) on the Comprehensive Plan map and zoned Agriculture-20 (AG-20). The parcels are:

- **APN 211244000** – 2805 NW 309th Street, Ridgefield; 3.96 acres.
- **APN 211241000** – 2805 NW 309th Street, Unit 22, Ridgefield; 2.06 acres.
- **APN 211265000** – no situs address; 10.09 acres.
- **APN 211208005** – no situs address; 10.96 acres.
- **APN 211208000** – 30307 NW 31st Avenue, Ridgefield; 6.73 acres.

The Properties currently support existing commercial / industrial uses, including Black Diamond Diesel, and they are located near the Cowlitz Indian Tribe's ilani resort and casino complex.

III. Why the Properties are Characterized by Urban Growth

Under the Growth Management Act, land is "characterized by urban growth" if it has urban growth on it, or if it is "located in relationship to an area with urban growth on it as to be appropriate for urban growth." RCW 36.70A.030(49). The Properties meet this standard. They are located right at the edge of the existing La Center UGA, are close to existing urban services, and sit in an area that is developing at urban intensity.

A. The Properties are contiguous with the La Center UGA.

As shown in the GIS Fact Sheet (Exhibit B), three of the five Properties (APN 211244000, 211241000, and 211265000) share a property line with the La Center UGA boundary on their east side. The remaining two Properties are only a short distance from the boundary: APN 211208005 is approximately 80 feet, and APN 211208000 is approximately 640 feet from the southwest corner of the UGA. The Properties also front I-5, a primary transportation corridor.

B. Urban services are available near the Properties.

The Growth Management Act defines "urban governmental services" to include storm and sanitary sewer, domestic water, fire and police protection, and public transit. RCW 36.70A.030(48). Clark County GIS data shows that each of these services is already in place near the Properties (Exhibit B):

- Stormwater: The County's storm sewer system extends along NW 31st Avenue and NW 309th Street. Four of the five Properties abut one or both of those roads, and the fifth (APN 211241000) is adjacent to Properties that do.

- Water: Currently served by Clark Public Utilities. Ridgefield Water District is less than half a mile from the Properties.

- Sanitary sewer: The Properties are currently on septic. The nearest sewer district boundary is the Clark Regional, and is approximately 0.70 to 0.93 miles away.

- Transit: C-TRAN bus service is available at the Cowlitz Indian Reservation, approximately 0.46 – 0.67 miles away.

- Fire and schools: The Properties are within the Ridgefield School District and the Clark-Cowlitz Fire Rescue.

Because these services are nearby and can be extended to the Properties, the Properties fall within the areas the GMA prioritizes for urban growth: areas "that will be served adequately by a combination of both existing public facilities and services and any additional needed public facilities and services." RCW 36.70A.110(3).

C. The surrounding area is developing at urban intensity.

On September 14th, 2026, we conducted windshield surveys of recent development in the Cities of La Center and Ridgefield (Exhibit C). The photographs show:

- Paradise Pointe neighborhood, Ridgefield : extensive residential construction along Paradise Avenue, N 12th Way, N 15th Way, N 16th Way, N 43rd Avenue, and N 18th Circle; existing homes and a neighborhood park (Storybrook Hollow Park); and a builder's sign on NW 289th Street advertising new homes. This neighborhood is approximately 1.1-1.4 miles away from the Properties.

- Costco and N 56th Place, Ridgefield : the new Costco store, parking lot, and gas station; new commercial buildings for lease; new businesses including In-N-Out and Dental Care of Union Ridge; and ongoing construction at the N 56th Place / Pioneer Canyon Drive roundabout. This area is approximately 2 miles away from the Properties

This is the kind of development the GMA describes as urban growth: the "intensive use of land for the location of buildings, structures, and impermeable surfaces." RCW 36.70A.030(49). New homes, streets, parks, and commercial centers are being built along the I-5 corridor near the properties.

D. Nearby tribal lands are developed at urban intensity.

Located adjacent to the Cowlitz ilani Casino Complex and I-5 along NW 31st Avenue, these parcels are only 680 feet from Cowlitz lands held in trust by the United States of America. Parcels 211244000, 211265000, and 211241000 are all owned by the same family, along NW 31st Avenue. All three

parcels border Interstate 5. Parcel 211244000 is developed with a residential character, including a dwelling and outbuildings. Parcel 211265000 is in large part paved over and used for various light industrial purposes. Parcel 211241000 is small and surrounded by parcels 211244000 and 211265000, and only contains a storm retention pond. All three are part of the urban reserve and feature the Industrial zoning overlay.

Parcel 211208005 is owned by a different entity, and is coterminous with the other three parcels. It is located just to the south, also between Interstate 5 and NW 31st Avenue, and is less than 1,500 feet from Cowlitz lands held in trust by the United States of America. This parcel is also fully developed with light industrial uses, is part of the urban reserve, and is subject to the Industrial zoning overlay.

Under federal law (the Indian Reorganization Act), with only a few specific geographical site exceptions, “none of the laws, ordinances, codes, resolutions, rules or other regulations of any State or political subdivision thereof limiting, zoning or otherwise governing, regulating, or controlling the use or development of any real or personal property, including water rights, shall be applicable to any such property leased from or held or used under agreement with and belonging to any Indian or Indian tribe, band, or community that is held in trust by the United States or is subject to a restriction against alienation imposed by the United States.” 25 C.F.R. § 1.4. As the Cowlitz tribe continues to bring lands surrounding the ilani complex into tribal possession, when those lands are moved into federal trust, they become exempt from all state and local land use regulations. Federal law requires that the trust lands be utilized for the highest and best use of the tribe to advance “tribal interests in self-government, self-sufficiency, economic development, governmental revenue, and tribal employment.” *Cal. v. Cabazon Band of Mission Indians*, 480 U.S. 202 (1987). Even before the lands owned by the Cowlitz tribe in and around the ilani complex are brought into trust, they are either explicitly or likely to be characterized as “Indian Country”[1], and therefore exempt from local land use regulations. The tribe’s history and continued practice of successful urban development means that the lands currently owned in fee by the Cowlitz tribe itself, by any of its various corporate entities, by its Gaming or Economic Authority, or by the United States of America held in trust for the benefit of the tribe, are characterized by urban development, and will be used for non-agricultural purposes and additional urban development, removing what little remains of the rural character of the neighborhood near the Properties.

The Properties are in very close proximity to land explicitly owned in trust by the United States of America for the benefit of the Cowlitz tribe. The tribe has heavily developed their trust lands and intends to continue doing so. The Properties are already developed for non-agricultural purposes and border a major interstate and a major local thoroughfare. No reasonable analysis could conclude that the subject parcels have rural characteristics; rather, they are characterized by urban growth.

[1] "Indian country," as defined at 18 U. S. C. § 1151, includes "all land within the limits of any Indian reservation under the jurisdiction of the United States Government, notwithstanding the issuance of any patent, and, including rights-of-way running through the reservation." *California v. Cabazon Band of Mission Indians*, 480 U.S. 202, 207 n.5, 107 S. Ct. 1083, 1087, 94 L.Ed.2d 244, 253 (1987). The Cowlitz non-trust lands owned by tribal corporate entities are enclaves surrounded by trust lands.

IV. Conclusion

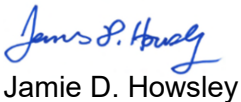
The Properties are characterized by urban growth. Three of the five parcels share a boundary with the existing La Center UGA, and the other two are within a few hundred feet of it. Water, stormwater, sewer, and transit services are already in place nearby. The Properties front I-5 and sit in an area that is developing at urban intensity, as the County's GIS data (Exhibit B) and our windshield surveys (Exhibit C) show.

For these reasons, we respectfully request that the County (1) include the Properties in the City of La Center UGA; (2) change the Properties' Comprehensive Plan designation from Agriculture (AG) to Industrial (I), with no overlay; and (3) change the Properties' zoning from Agriculture-20 (AG-20) to Light Industrial (IL), with no overlay.

Please include this letter and its exhibits in the record for the 2025 Comprehensive Plan Periodic Update. Thank you for your consideration.

Very truly yours,

JORDAN RAMIS PC



Jamie D. Howsley
Admitted in Oregon and Washington
Exhibits:

A – Original Site Specific Request dated November 15, 2023

B – GIS Fact Sheet

C – Windshield Surveys, Cities of La Center and Ridgefield (September 14, 2026)

D – Cowlitz Tribe and Affiliates Ownership Map

JORDAN RAMIS

Jamie D. Howsley
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F (503) 598-7373

November 15, 2023

Clark County Board of County Council
c/o Oliver Orjiako, Community Planning Director
Clark County
1300 Franklin St.
Vancouver, WA 98660
E-mails: Oliver.Orjiako@clark.wa.gov, Rebecca.Messinger@clark.wa.gov

Re: ***Site-Specific Growth Management Area Change, Zone Change, and Comprehensive Plan Designation Change***

Dear Chair Bowerman, Councilors Belkot, Marshall, Medvigy, and Yung:

Our office represents the owners of five parcels with property identification numbers 211244000, 211241000, 211265000, 211208005, and 211208000 (collectively, the "Properties"), which are bound by NW 309th St to the north, I-5 to the east, Brindle Ridge Farms to the south, and NW 31st Ave to the west. This letter is written to respectfully request that Clark County (the "County") approve: 1) the inclusion of the Properties in the City of La Center growth management area, 2) a zone change, and 3) a general plan designation change for the Properties. Letters from the property owners are included with this request authorizing Jordan Ramis PC to represent their request for said changes.

The Properties currently have the Comprehensive Plan designation of AG, and a Zoning designation of Agriculture-20 (AG-20). The AG-20 designation is generally applied to lands that are at least 20 acres in size and have the growing capacity, productivity, soil composition, and surrounding land use to have long-term commercial significance for agriculture and associated resource production. However, none of the parcels are 20 acres or larger and the Properties are adjacent to I-5, currently support commercial and industrial uses, and are located nearby a large gaming complex. Additionally, due to changes in market conditions and the condition of on-site soils, it is no longer a viable, long-term strategy to utilize the Properties for agricultural purposes.

We are requesting that the County include the Properties in the La Center growth management area and change the Comprehensive Plan designation to Industrial (I) with no overlay and Zoning designation to Light Industrial (IL), also with no zoning overlay. Doing so will help support much needed jobs and economic development in La Center and the County.

This Site-Specific Request is submitted for consideration during the current Comprehensive Plan Periodic Update 2025 (the "2025 Plan") in compliance with Clark County Unified Development Code (CCC) 40.560.010. We respectfully request the County make the aforementioned changes to the Properties because they are ideally situated to help spur job growth and economic development, and we believe that the best future will be for residential light industrial purposes.

We have attached the following exhibits for reference and additional support for this request:

Exhibit A – Map Identifying the Properties

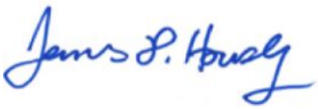
Exhibit B – Letters of Authorization from Property Owners

Once the 2025 Plan update schedule is finalized, we intend to submit a detailed narrative for this request addressing the criteria of the Growth Management Act (GMA), CCC, and Clark County's 20-Year Comprehensive Plan.

Thank you for your consideration of this request.

Very truly yours,

JORDAN RAMIS PC



Jamie D. Howsley
Admitted in Oregon and Washington

cc: Client
Ezra Hammer, Jordan Ramis PC

Exhibit A
Maps Identifying the Properties

Property Fact Sheet for Account 211244000

October 31, 2023

General Information

Property Account	211244000
Site Address	2805 NW 309TH ST, RIDGEFIELD, WA 98642
Legal Desc	#42 SEC 9 T4N R1EWM 3.96A
Owner	MCLEAN TERRY S & MCLEAN ELIZABETH K
Mail Address	18301 NE 92ND AVE BATTLE GROUND WA , 98604 US
Tax Status	Regular
Property Status	Active
Area (approx.)	172,498 sq. ft. / 3.96 acres
Section-Township-Range	SW 1/4,S09,T4N,R1E

Assessment (2023 Values for 2024 Taxes)

Land Value	$235,283.00
Building Value	$323,805.00
Total Property Value	$559,088.00
Total Taxable Value	$379,677.00

Most Recent Sale

Sale Date	10/14/2005
Document Type	DEED
Sale Number	0578296
Sale Amount	$416,000.00

Administrative

Jurisdiction	Clark County
Land Use Planning	
Comprehensive Plan Designation	AG
Comprehensive Plan Overlay(s)	none
Urban Growth Area	County
Zoning Designation - Codes	Agriculture-20 (AG-20)
Zoning Overlay(s)	none
Miscellaneous	
Census Tract	403.01
Drainage District	n/a
Neighborhood	Ridgefield Junction
Park District	n/a
Public Safety	
Burning Allowed	Yes
EMS Response Area	AMR
Fire District	Clark-Cowlitz Fire Rescue
Increased Wildfire Danger Area	No
Police Jurisdiction	CCSO West
Schools	
School District Name	Ridgefield
Elementary School Attendance Area	Union Ridge
Middle School Attendance Area	View Ridge
High School Attendance Area	Ridgefield
Transportation	
C-TRAN Public Transportation Benefit Area	No
Traffic Impact Fee (TIF) District	Rural
Transportation Analysis Zone	583
Utilities	
CPU Lighting Utility District	n/a
Last Street Sweeping	n/a
Sewer District	Rural/Resource
Waste Collection Provider	Waste Connections
Water District	Clark Public Utilities



Environmental Public Health

Public Health Food Inspector District	District 3
Public Health Food Plan Review Area	District A
Public Health WRAP Inspector District	District 2

Wetlands and Soil Types

Critical Aquifer Recharge Area	Category 2 Recharge Areas
FEMA Map / FIRM Panel	53011C0202D 53011C0204D
Flood Hazard Area	Outside Flood Area
Shoreline Designation	none
Soil Types / Class	Hydric / CvA Non-Hydric / GeB Hydric / OdB Non-Hydric / SlB
Water Resource Inventory Area	Name: LEWIS Sub-Basin: East Fork Lewis Name: LEWIS Sub-Basin: Lower Lewis
Watershed	Allen Canyon Creek East Fork Lewis River
Sub Watershed	Allen Canyon Creek McCormick Creek
Wetland Class	No Mapping Indicators
Wetland Inventory	Presence

Geological Hazards

Geological Hazard	
Liquefaction	Very Low to Low
NEHRP Class	C
Slope Stability	

Development Moratorium

none

Cultural Resources

Archaeological Probability	High
Archaeological Site Buffer	No
Historic Site	INV -

Habitat and Species Resources

Habitat and Species Impacts	Yes
Riparian Habitat Area:	Fish Habitat Stream Seasonal Stream

Property Fact Sheet for Account 211241000

October 31, 2023

General Information

Property Account	211241000
Site Address	2805 NW 309TH ST UNIT 22, RIDGEFIELD, WA 98642
Legal Desc	#39 SEC 9 T4N R1EWM 2.06A
Owner	MCLEAN TERRY S & MCLEAN ELIZABETH K
Mail Address	18301 NE 92ND AVE BATTLE GROUND WA , 98604 US
Tax Status	Regular
Property Status	Active
Area (approx.)	89,734 sq. ft. / 2.06 acres
Section-Township-Range	SW 1/4,S09,T4N,R1E

Assessment (2023 Values for 2024 Taxes)

Land Value	$120,137.00
Building Value	$0.00
Total Property Value	$120,137.00
Total Taxable Value	$722.00

Most Recent Sale

Sale Date	10/14/2005
Document Type	DEED
Sale Number	0578296
Sale Amount	$416,000.00

Administrative

Jurisdiction	Clark County
Land Use Planning	
Comprehensive Plan Designation	AG
Comprehensive Plan Overlay(s)	none
Urban Growth Area	County
Zoning Designation - Codes	Agriculture-20 (AG-20)
Zoning Overlay(s)	none
Miscellaneous	
Census Tract	403.01
Drainage District	n/a
Neighborhood	Ridgefield Junction
Park District	n/a
Public Safety	
Burning Allowed	Yes
EMS Response Area	AMR
Fire District	Clark-Cowlitz Fire Rescue
Increased Wildfire Danger Area	No
Police Jurisdiction	CCSO West
Schools	
School District Name	Ridgefield
Elementary School Attendance Area	Union Ridge
Middle School Attendance Area	View Ridge
High School Attendance Area	Ridgefield
Transportation	
C-TRAN Public Transportation Benefit Area	No
Traffic Impact Fee (TIF) District	Rural
Transportation Analysis Zone	583
Utilities	
CPU Lighting Utility District	n/a
Last Street Sweeping	n/a
Sewer District	Rural/Resource
Waste Collection Provider	n/a
Water District	Clark Public Utilities



Environmental Public Health

Public Health Food Inspector District	District 3
Public Health Food Plan Review Area	District A
Public Health WRAP Inspector District	District 2

Wetlands and Soil Types

Critical Aquifer Recharge Area	Category 2 Recharge Areas
FEMA Map / FIRM Panel	53011C0204D
Flood Hazard Area	Outside Flood Area
Shoreline Designation	none
Soil Types / Class	Non-Hydric / GeB Hydric / OdB Non-Hydric / SlB
Water Resource Inventory Area	Name: LEWIS Sub-Basin: East Fork Lewis Name: LEWIS Sub-Basin: Lower Lewis
Watershed	Allen Canyon Creek East Fork Lewis River
Sub Watershed	Allen Canyon Creek McCormick Creek
Wetland Class	PEMFH
Wetland Inventory	Presence

Geological Hazards

Geological Hazard	
Liquefaction	Very Low to Low
NEHRP Class	C
Slope Stability	

Development Moratorium

none

Cultural Resources

Archaeological Probability	High
Archaeological Site Buffer	No
Historic Site	No Mapping Indicators

Habitat and Species Resources

Habitat and Species Impacts	Yes
Riparian Habitat Area:	Fish Habitat Stream Seasonal Stream

Property Fact Sheet for Account 211265000

October 31, 2023

General Information

Property Account	211265000
Site Address	
Legal Desc	#63 SEC 9 T4N R1EWM 10.09A
Contract Buyer	MCLEAN TERRY S & MCLEAN ELIZABETH (C/B)
Mail Address	18301 NE 92ND AVE BATTLE GROUND WA , 98604 US
Tax Status	Regular
Property Status	Active
Area (approx.)	439,520 sq. ft. / 10.09 acres
Section-Township-Range	SW 1/4,S09,T4N,R1E

Assessment (2023 Values for 2024 Taxes)

Land Value	$400,807.00
Building Value	$0.00
Total Property Value	$400,807.00
Total Taxable Value	$49,258.00

Most Recent Sale

Sale Date	01/05/1993
Document Type	CONT
Sale Number	0346034
Sale Amount	$55,000.00

Administrative

Jurisdiction	Clark County
Land Use Planning	
Comprehensive Plan Designation	AG
Comprehensive Plan Overlay(s)	none
Urban Growth Area	County
Zoning Designation - Codes	Agriculture-20 (AG-20)
Zoning Overlay(s)	none
Miscellaneous	
Census Tract	403.01
Drainage District	n/a
Neighborhood	Ridgefield Junction
Park District	n/a
Public Safety	
Burning Allowed	Yes
EMS Response Area	AMR
Fire District	Clark-Cowlitz Fire Rescue
Increased Wildfire Danger Area	No
Police Jurisdiction	CCSO West
Schools	
School District Name	Ridgefield
Elementary School Attendance Area	Union Ridge
Middle School Attendance Area	View Ridge
High School Attendance Area	Ridgefield
Transportation	
C-TRAN Public Transportation Benefit Area	No
Traffic Impact Fee (TIF) District	Rural
Transportation Analysis Zone	583
Utilities	
CPU Lighting Utility District	n/a
Last Street Sweeping	n/a
Sewer District	Rural/Resource
Waste Collection Provider	n/a
Water District	Clark Public Utilities



Environmental Public Health

Public Health Food Inspector District	District 3
Public Health Food Plan Review Area	District A
Public Health WRAP Inspector District	District 2

Wetlands and Soil Types

Critical Aquifer Recharge Area	Category 2 Recharge Areas
FEMA Map / FIRM Panel	53011C0202D 53011C0204D
Flood Hazard Area	Outside Flood Area
Shoreline Designation	none
Soil Types / Class	Hydric / CvA Hydric / OdB Non-Hydric / SIB
Water Resource Inventory Area	Name: LEWIS Sub-Basin: East Fork Lewis Name: LEWIS Sub-Basin: Lower Lewis
Watershed	Allen Canyon Creek East Fork Lewis River
Sub Watershed	Allen Canyon Creek McCormick Creek
Wetland Class	PEMFH
Wetland Inventory	Presence

Geological Hazards

Geological Hazard	
Liquefaction	Very Low to Low
NEHRP Class	C
Slope Stability	

Development Moratorium

none

Cultural Resources

Archaeological Probability	Moderate-High High
Archaeological Site Buffer	No
Historic Site	No Mapping Indicators

Habitat and Species Resources

Habitat and Species Impacts	Yes
Riparian Habitat Area:	Fish Habitat Stream

Property Fact Sheet for Account 211208005

October 31, 2023

General Information

Property Account	211208005
Site Address	
Legal Desc	LOT 2 SP2-887 10.96A
Owner	TYC LLC
Mail Address	JOHN HOLTMANN 26903 NE 45TH AVE RIDGEFIELD WA , 98642 US
Tax Status	Regular
Property Status	Active
Area (approx.)	477,418 sq. ft. / 10.96 acres
Section-Township-Range	SW 1/4,S09,T4N,R1E

Assessment (2023 Values for 2024 Taxes)

Land Value	$400,740.00
Building Value	$0.00
Total Property Value	$400,740.00
Total Taxable Value	$400,740.00

Most Recent Sale

Sale Date	05/07/2009
Document Type	D-QCD
Sale Number	637459
Sale Amount	$0.00

Administrative

Jurisdiction	Clark County
Land Use Planning	
Comprehensive Plan Designation	AG
Comprehensive Plan Overlay(s)	none
Urban Growth Area	County
Zoning Designation - Codes	Agriculture-20 (AG-20)
Zoning Overlay(s)	none
Miscellaneous	
Census Tract	403.01
Drainage District	n/a
Neighborhood	Ridgefield Junction
Park District	n/a
Public Safety	
Burning Allowed	Yes
EMS Response Area	AMR
Fire District	Clark-Cowlitz Fire Rescue
Increased Wildfire Danger Area	No
Police Jurisdiction	CCSO West
Schools	
School District Name	Ridgefield
Elementary School Attendance Area	Union Ridge
Middle School Attendance Area	View Ridge
High School Attendance Area	Ridgefield
Transportation	
C-TRAN Public Transportation Benefit Area	No
Traffic Impact Fee (TIF) District	Rural
Transportation Analysis Zone	583
Utilities	
CPU Lighting Utility District	n/a
Last Street Sweeping	n/a
Sewer District	Rural/Resource
Waste Collection Provider	n/a
Water District	Clark Public Utilities



Environmental Public Health

Public Health Food Inspector District	District 3
Public Health Food Plan Review Area	District A
Public Health WRAP Inspector District	District 2

Wetlands and Soil Types

Critical Aquifer Recharge Area	Category 2 Recharge Areas
FEMA Map / FIRM Panel	53011C0204D
Flood Hazard Area	Outside Flood Area
Shoreline Designation	none
Soil Types / Class	Non-Hydric / GeD Hydric / OdB Non-Hydric / SlB
Water Resource Inventory Area	Name: LEWIS Sub-Basin: East Fork Lewis Name: LEWIS Sub-Basin: Lower Lewis
Watershed	Allen Canyon Creek East Fork Lewis River
Sub Watershed	Allen Canyon Creek McCormick Creek
Wetland Class	No Mapping Indicators
Wetland Inventory	Presence

Geological Hazards

Geological Hazard	Areas of Potential Instability
Liquefaction	Very Low to Low
NEHRP Class	C
Slope Stability	

Development Moratorium

none

Cultural Resources

Archaeological Probability	Moderate-High High
Archaeological Site Buffer	No
Historic Site	No Mapping Indicators

Habitat and Species Resources

Habitat and Species Impacts	Yes
Adjacent to Habitat Area:	Oak Woodland

Property Fact Sheet for Account 211208000

October 31, 2023

General Information

Property Account	211208000
Site Address	30307 NW 31ST AVE, RIDGEFIELD, WA 98642
Legal Desc	LOT 1 SP2-887 6.73A
Owner	TRO HOLDINGS LLC
Mail Address	2301 SE HIDDEN WAY #100 VANCOUVER WA , 98661
Tax Status	Regular
Property Status	Active
Area (approx.)	293,159 sq. ft. / 6.73 acres
Section-Township-Range	SW 1/4,S09,T4N,R1E

Assessment (2023 Values for 2024 Taxes)

Land Value	$375,979.00
Building Value	$746,517.00
Total Property Value	$1,122,496.00
Total Taxable Value	$1,122,496.00

Most Recent Sale

Sale Date	01/06/2023
Document Type	D-SWD
Sale Number	875493
Sale Amount	$1,750,000.00

Administrative

Jurisdiction	Clark County
Land Use Planning	
Comprehensive Plan Designation	AG
Comprehensive Plan Overlay(s)	none
Urban Growth Area	County
Zoning Designation - Codes	Agriculture-20 (AG-20)
Zoning Overlay(s)	none
Miscellaneous	
Census Tract	403.01
Drainage District	n/a
Neighborhood	Ridgefield Junction
Park District	n/a
Public Safety	
Burning Allowed	Yes
EMS Response Area	AMR
Fire District	Clark-Cowlitz Fire Rescue
Increased Wildfire Danger Area	No
Police Jurisdiction	CCSO West
Schools	
School District Name	Ridgefield
Elementary School Attendance Area	Union Ridge
Middle School Attendance Area	View Ridge
High School Attendance Area	Ridgefield
Transportation	
C-TRAN Public Transportation Benefit Area	No
Traffic Impact Fee (TIF) District	Rural
Transportation Analysis Zone	583
Utilities	
CPU Lighting Utility District	n/a
Last Street Sweeping	n/a
Sewer District	Rural/Resource
Waste Collection Provider	n/a
Water District	Clark Public Utilities



Environmental Public Health

Public Health Food Inspector District	District 3
Public Health Food Plan Review Area	District A
Public Health WRAP Inspector District	District 2

Wetlands and Soil Types

Critical Aquifer Recharge Area	Category 2 Recharge Areas
FEMA Map / FIRM Panel	53011C0204D
Flood Hazard Area	Outside Flood Area
Shoreline Designation	none
Soil Types / Class	Non-Hydric / GeD Hydric / OdB Non-Hydric / PuA Non-Hydric / SIB
Water Resource Inventory Area	Name: LEWIS Sub-Basin: East Fork Lewis Name: LEWIS Sub-Basin: Lower Lewis
Watershed	Allen Canyon Creek East Fork Lewis River
Sub Watershed	Allen Canyon Creek McCormick Creek
Wetland Class	No Mapping Indicators
Wetland Inventory	Presence

Geological Hazards

Geological Hazard	Slopes > 15%
Liquefaction	Very Low to Low
NEHRP Class	C
Slope Stability	

Development Moratorium

none

Cultural Resources

Archaeological Probability	Moderate-High High
Archaeological Site Buffer	No
Historic Site	No Mapping Indicators

Habitat and Species Resources

Habitat and Species Impacts	Yes
Habitat Area:	Oak Woodland
Adjacent to Habitat Area:	Oak Woodland
Riparian Habitat Area:	Seasonal Stream

Exhibit B
Letters of Authorization from Property Owners

JORDAN RAMIS

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

LETTER OF AUTHORIZATION

TRO Holdings LLC is the owner of record for the real property located at 30307 NW 31st Ave in Ridgefield, Washington (Assessor Tax Parcel No. 211208000) (the "Property"). We hereby authorize Jordan Ramis PC, and its counsel, to file any and all required applications, documents, and correspondence with the relevant Washington State, Clark County, and local authorities to request that Clark County change the urban growth area, zoning, and general plan designation for the Property.

Authorized Signer: Michael J Pawlow

Title: Owner

Date: 11/7/2023

56253-60752 4895-9718-4366.1

Portland | Bend | Vancouver, WA | jordanramis.com

JORDAN RAMIS

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

LETTER OF AUTHORIZATION

TYC LLC is the owner of record for the real property located along NW 31st Ave in Ridgefield, Washington (Assessor Tax Parcel No. 211208005) (the "Property"). We hereby authorize Jordan Ramis PC, and its counsel, to file any and all required applications, documents, and correspondence with the relevant Washington State, Clark County, and local authorities to request that Clark County change the urban growth area, zoning, and general plan designation for the Property.

Authorized Signer: Michael J Parker

Title: Owner

Date: 11/7/2023

56253-00752 4865-9716-4368.1

JORDAN RAMIS

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

LETTER OF AUTHORIZATION

Elizabeth and Terry McLean are the owners of record for the real property located at the intersection of NW 31st Ave and 309th St in Ridgefield, Washington (Assessor Tax Parcels No. 211244000, 211265000 and 211241000) (the "Property"). We hereby authorize Jordan Ramis PC, and its counsel, to file any and all required applications, documents, and correspondence with the relevant Washington State, Clark County, and local authorities to request that Clark County change the urban growth area, zoning, and general plan designation for the Property.

Authorized Signer: Elizabeth McLean
Elizabeth McLean

Date: 11/15/2023

Authorized Signer: Terry McLean
Terry McLean

Date: 11/15/2023

56253-80752 4895-9718-4368.1

New Development (applies to all APNs)
1) Union Ridge Town Center – approximately 2 miles away
- recently opened Costco, in process of opening Chipotle, In-N-Out, Panda Express.
2) Tri-Mountain Station – across the street from Union Ridge Town Center; new commercial development ft. Goodwill, Discount Tire, and other retail.
3)Paradise Pointe – new residential community under construction – approx. 1.1-1.4 miles away of properties

PARCEL 1: APN 211244000

City: Ridgefield
Property address: 2805 NW 309th St., Ridgefield, WA 98642
Property identification number: 211244000

Current comprehensive plan designation: AG
Current zoning plan designation: AG-20

Requested comprehensive plan designation: Industrial (no overlay)
Requested zoning plan designation: Light industrial (no overlay)

Existing Urban Services

- Sewer - No, septic. Parcel is ~.93 miles from closest sewer district (Clark Regional Sewer District).
- Water - Clark Public Utilities ~ .43 miles from closest water district (Ridgefield Water District).
- Stormwater – GIS map shows that storm sewer extends off NW 31st Avenue and Northwest 309th St.; this parcel abuts Northwest 309th St. on the north side. This parcel is adjacent to Parcel 3(APN 211265000), which abuts NW 31st Avenue on the west side.
- Transportation – does not have direct access to C-TRAN bus routes; however, walkable (0.47 miles) to Cowlitz Indian Reservation, which has C-TRAN bus routes

Proximity and Contiguity to UGA

Property line is touching boundary of La Center UGA on the east.

GoogleMaps APN 211244000 (Image from 2026)



Clark County Maps Online – APN 211244000 (Image from 2023)



PARCEL 2: APN 211241000

City: Ridgefield
Property address: 2805 NW 309th St., Unit 22, Ridgefield, WA 98642
Property identification number: 211241000

Current comprehensive plan designation: AG
Current zoning plan designation: AG-20

Requested comprehensive plan designation: Industrial (no overlay)
Requested zoning plan designation: Light industrial (no overlay)

Existing Urban Services

- Sewer - No, septic. Parcel is ~.90 miles from closest sewer district (Clark Regional Sewer District).
- Water - Clark Public Utilities ~ .41 miles from closest water district (Ridgefield Water District).
- Stormwater – GIS map shows that storm sewer extends off NW 31st Avenue and Northwest 309th St. This parcel does not have direct access via either road, but it is adjacent to Parcel 1 (APN 211244000), which abuts Northwest 309th St. on the north side; and is adjacent to Parcel 3 (APN 211265000), which abuts NW 31st Avenue on the west side.
- Transportation – does not have direct access to C-TRAN bus routes; however, walkable (0.55 miles) to Cowlitz Indian Reservation, which has C-TRAN bus routes.

Proximity and Contiguity to UGA

Property line is touching boundary of La Center UGA on the east side.

Google Maps aerial photo of APN 211241000 (Image from 2026)



Clark County Maps Online of APN 211241000 (Image from 2023)



PARCEL 3: APN 211265000

City: Ridgefield
Property address: No situs address
Property identification number: 211265000

Current comprehensive plan designation: AG
Current zoning plan designation: AG-20

Requested comprehensive plan designation: Industrial (no overlay)
Requested zoning plan designation: Light industrial (no overlay)

Existing Urban Services

- Sewer - No, septic. Parcel is ~.83 miles from closest sewer district (Clark Regional Sewer District).
- Water - Clark Public Utilities ~ .34 miles from closest water district (Ridgefield Water District).
- Stormwater – GIS map shows that storm sewer extends off NW 31st Avenue and Northwest 309th St.; this parcel abuts NW 31st Avenue on the west side, and Northwest 309th St. on the north side.
- Transportation – does not have direct access to C-TRAN bus routes; however, walkable (0.46 miles) to Cowlitz Indian Reservation, which has C-TRAN bus routes.

Proximity and Contiguity to UGA

Property line is touching boundary of La Center UGA on the east side.

Clark County Maps Online Image of APN 211265000- 2023



Google Maps Image of APN 211265000 - 2026



PARCEL 4: APN 211208005

City: Ridgefield
Property address: No situs address
Property identification number: 211208005

Current comprehensive plan designation: AG
Current zoning plan designation: AG-20

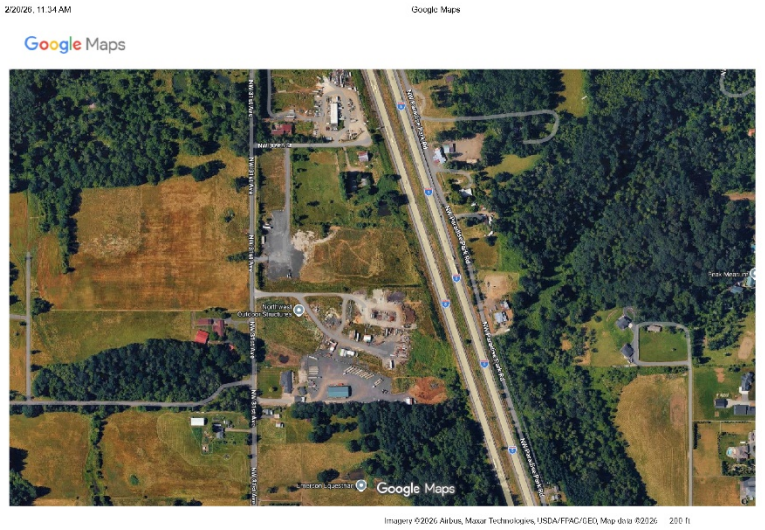
Requested comprehensive plan designation: Industrial (no overlay)
Requested zoning plan designation: Light industrial (no overlay)

Existing Urban Services

- Sewer - No, septic. Parcel is ~.75 miles from closest sewer district (Clark Regional Sewer District)
- Water - Clark Public Utilities ~ .24 miles from closest water district (Ridgefield Water District)
- Stormwater – GIS map shows that storm sewer extends off NW 31st Avenue; this parcel abuts NW 31st Avenue on the west side.
- Transportation – does not have direct access to C-TRAN bus routes; however, walkable (0.60 miles) to Cowlitz Indian Reservation, which has C-TRAN bus routes.

Proximity and Contiguity to UGA
Property line is approximately 80 feet from southwest corner of La Center UGA boundary.

Google Maps Aerial Image – Parcel (Image from 2026)



Clark County Maps Online – Parcel (Image from 2023)



PARCEL 5: APN 211208000

City: Ridgefield
Property address: 30307 NW 31ST AVE, RIDGEFIELD, WA 98642
Property identification number: 211208000

Current comprehensive plan designation: AG
Current zoning plan designation: AG-20

Requested comprehensive plan designation: Industrial (no overlay)
Requested zoning plan designation: Light industrial (no overlay)

Existing Urban Services

- Sewer - No, septic. Parcel is ~.70 miles from closest sewer district (Clark Regional Sewer District).
- Water - Clark Public Utilities ~ .20 miles from closest water district (Ridgefield Water District).
- Stormwater – GIS map shows that storm sewer extends off NW 31st Avenue; this parcel abuts NW 31st Avenue on the west side.
- Transportation – does not have direct access to C-TRAN bus routes; however, walkable (0.67 miles) to Cowlitz Indian Reservation, which has C-TRAN bus routes.

Proximity and Contiguity to UGA

Property line is approximately 640 feet from southwest corner of La Center UGA boundary.

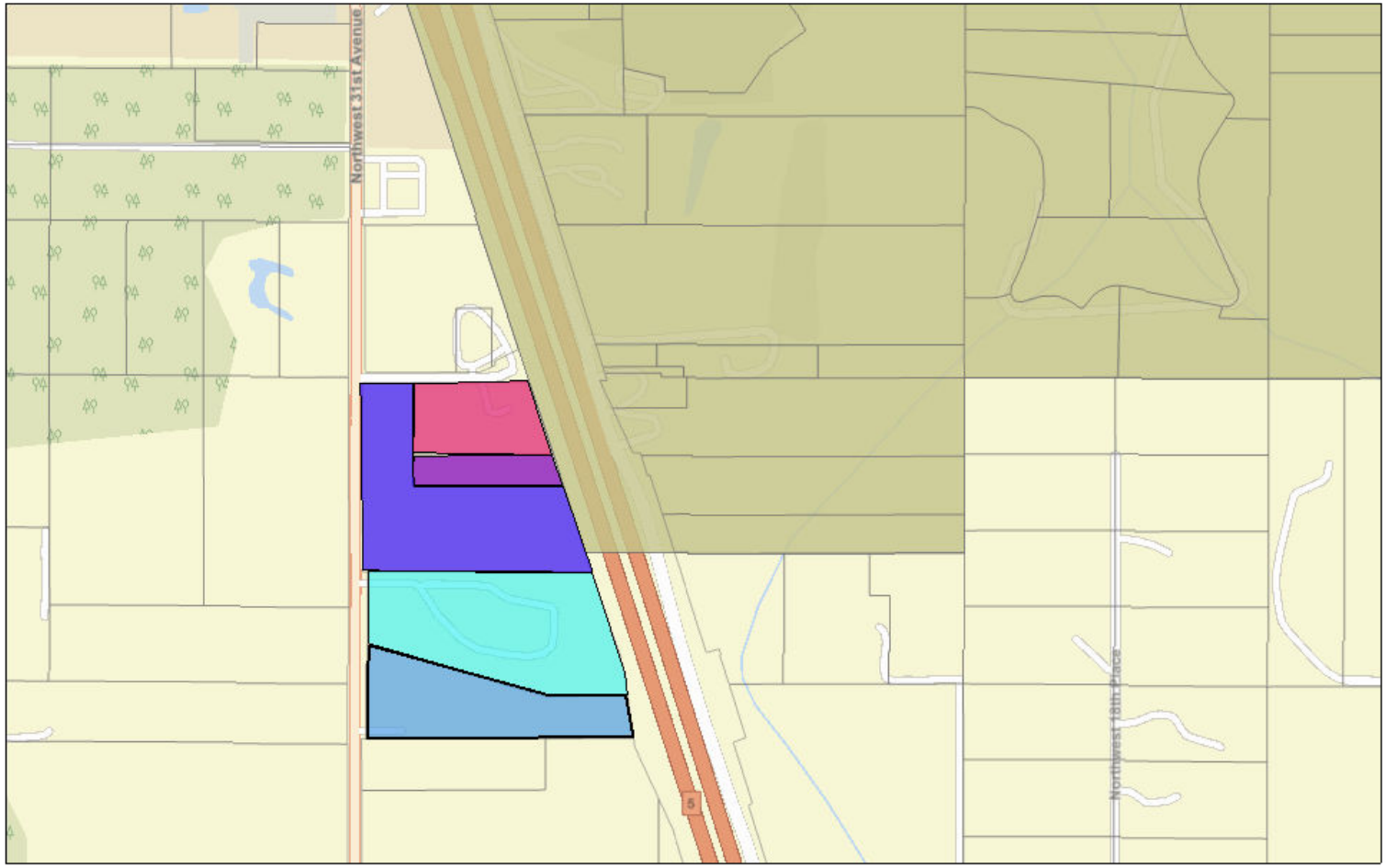
Clark County MapsOnline – Parcel (Image from 2023)



Google Maps – APN 211208000 (Image from 2026)



UGA Boundary - All Parcels (211244000, 211241000, 211265000, 211208005, 211208000)



2/20/2026

1:10,190

0 0.05 0.1 0.2 mi

0 0.07 0.15 0.3 km

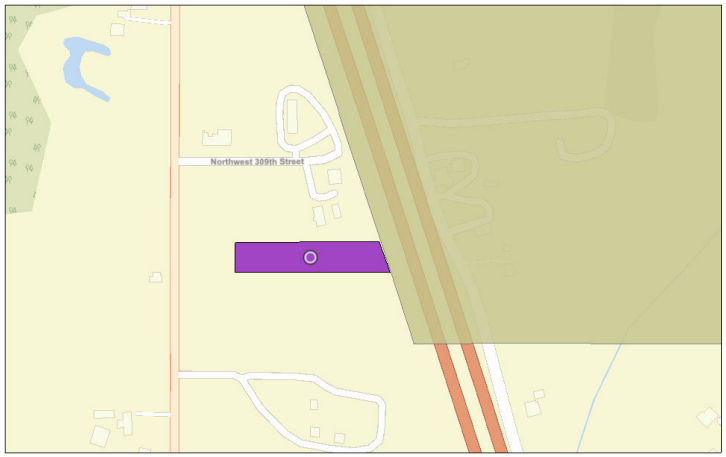
Sources: Map data © OpenStreetMap contributors, Microsoft, Esri Community Maps contributors, Map layer by Esri, Clark County WA

GIS Fact Sheet - APN 211244000, 211241000, 211265000, 211208005, 211208000

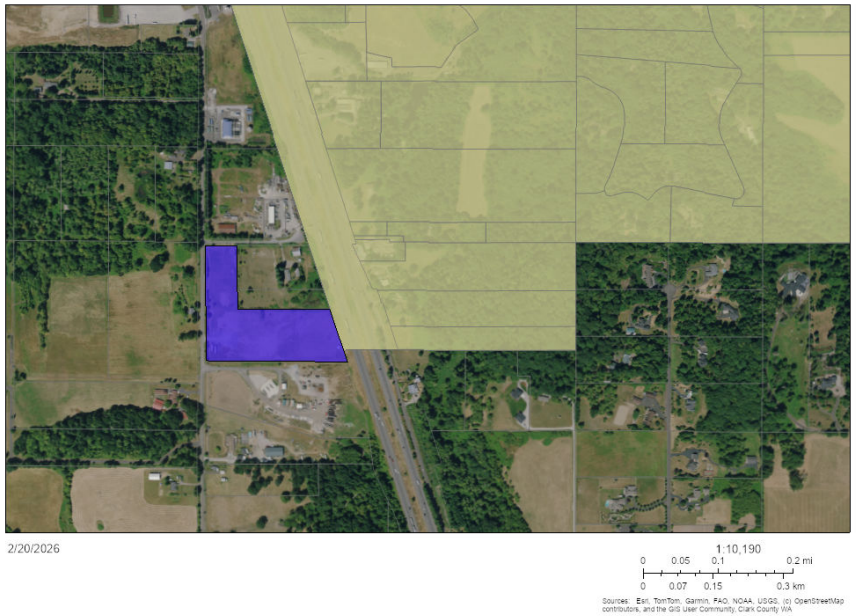
UGA Boundary - APN 211244000



UGA Boundary - APN 211241000



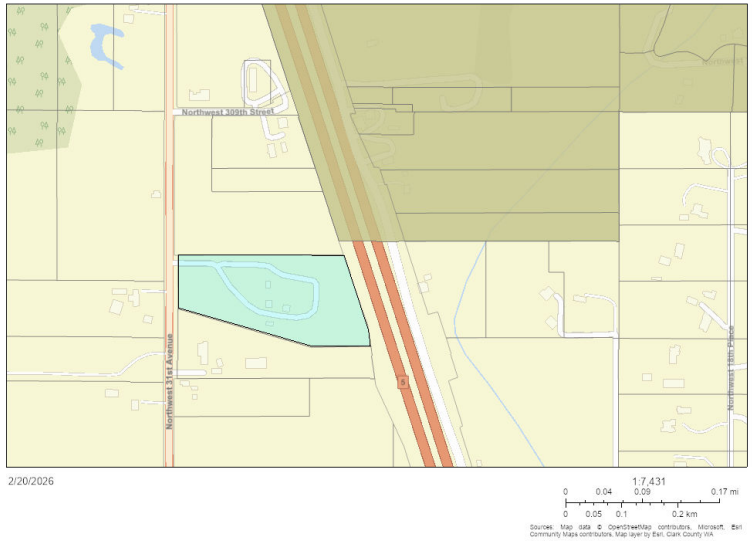
UGA Boundary - APN 211265000



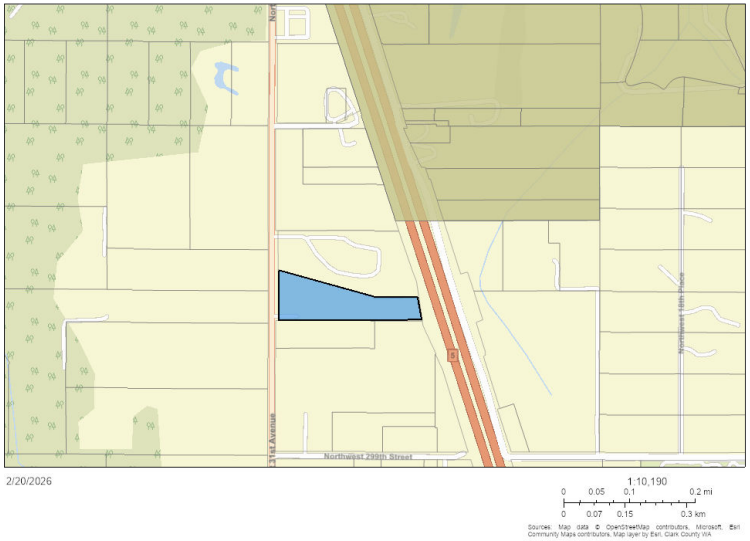
54613-78149 4897-3296-5777.5

GIS Fact Sheet - APN 211244000, 211241000, 211265000, 211208005, 211208000

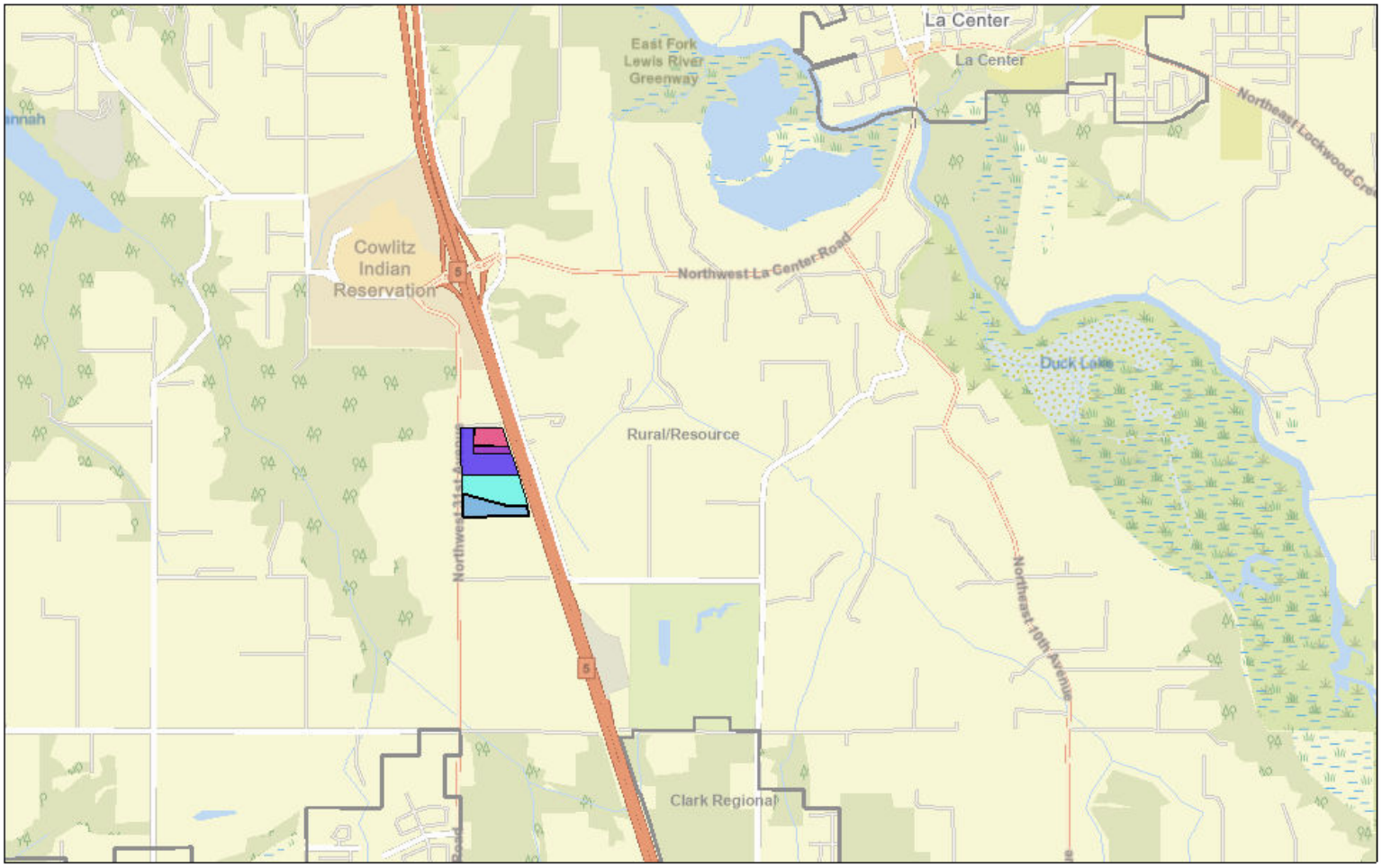
UGA Boundary - Parcel 211208005



UGA Boundary - APN 211208000

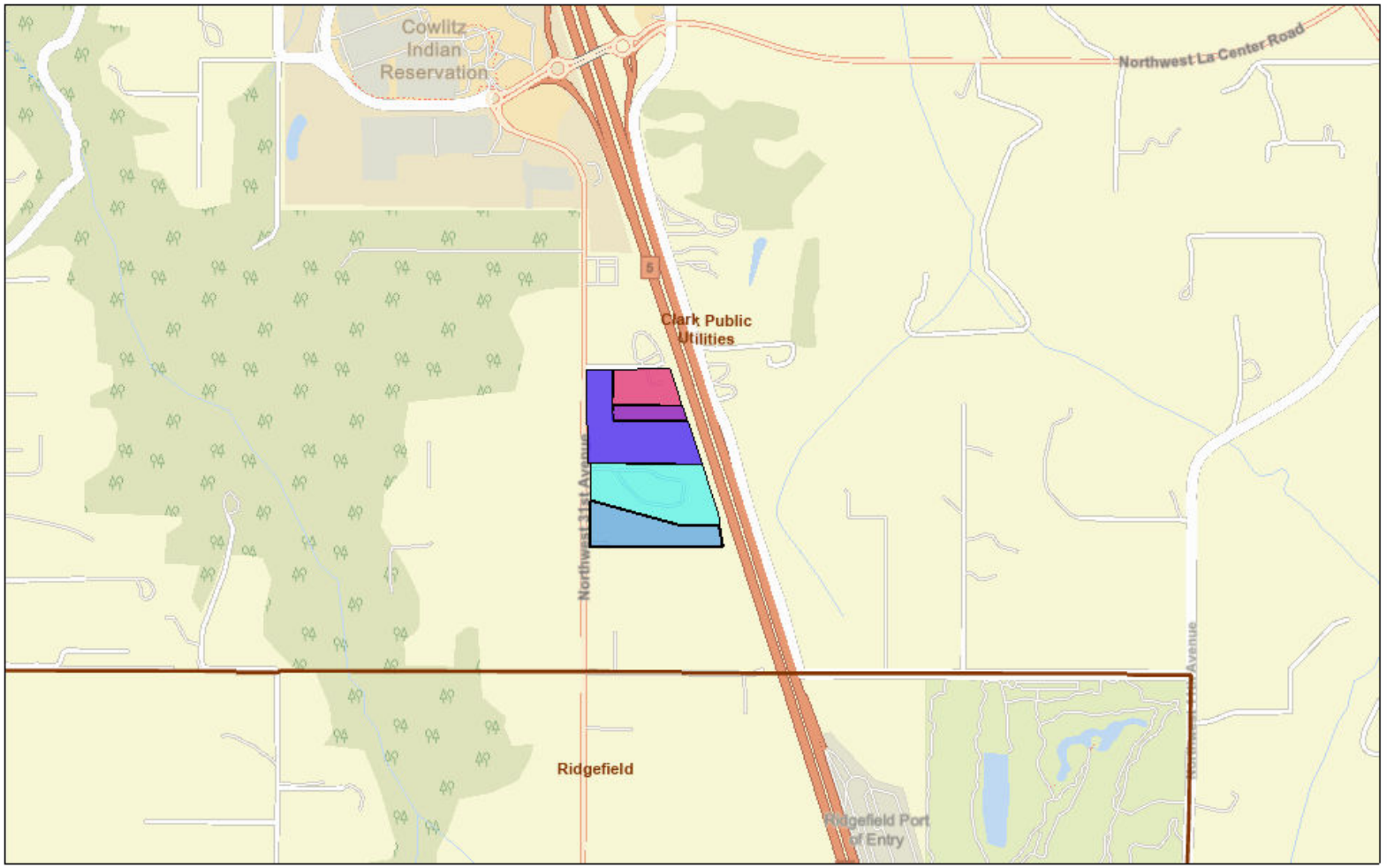


Sewer District Boundary - All Parcels (211244000, 211241000, 211265000, 211208005, 211208000)



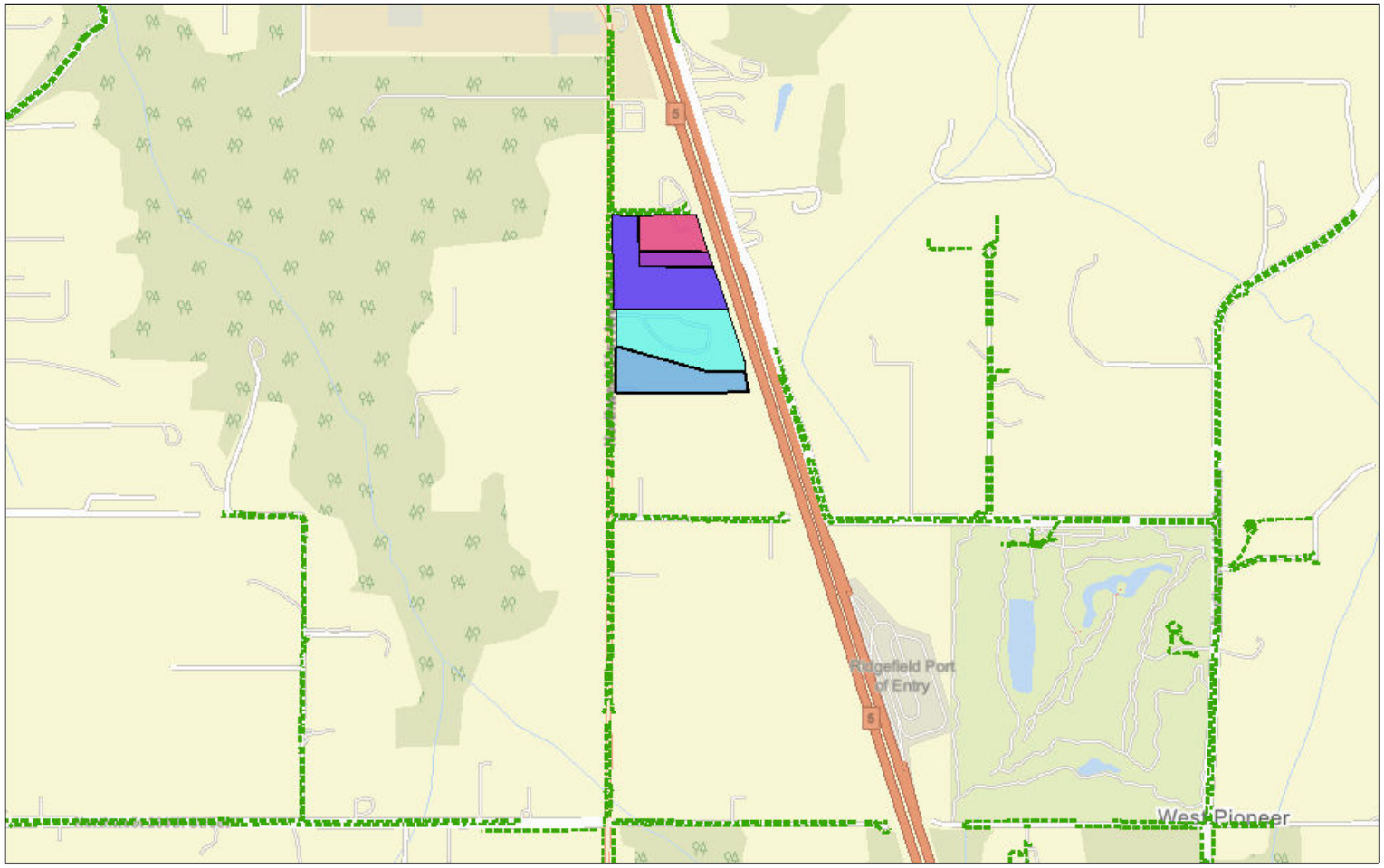
54613-78149 4897-3296-5777.5

Water District Boundary - All Parcels (211244000, 211241000, 211265000, 211208005, 211208000)



54613-78149 4897-3296-5777.5

Storm Sewer - All Parcels (211244000, 211241000, 211265000, 211208005, 211208000)



2/20/2026

Storm Sewer

1:20,381

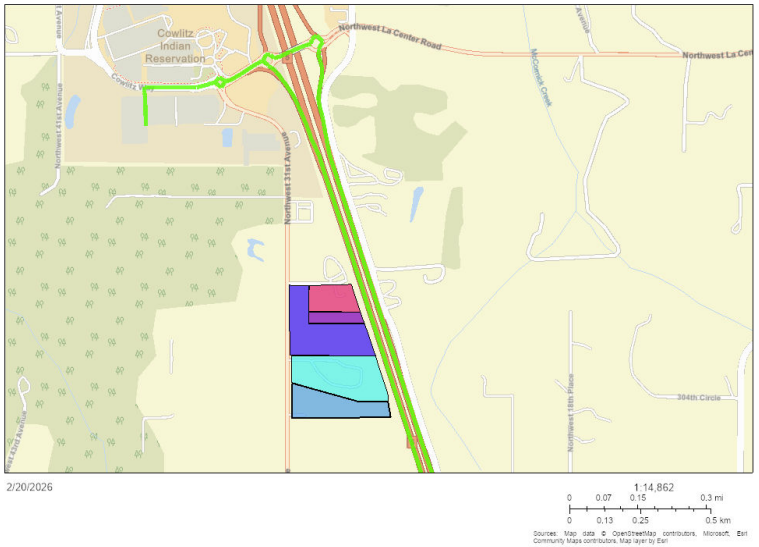
0 0.1 0.2 0.4 mi

0 0.17 0.35 0.7 km

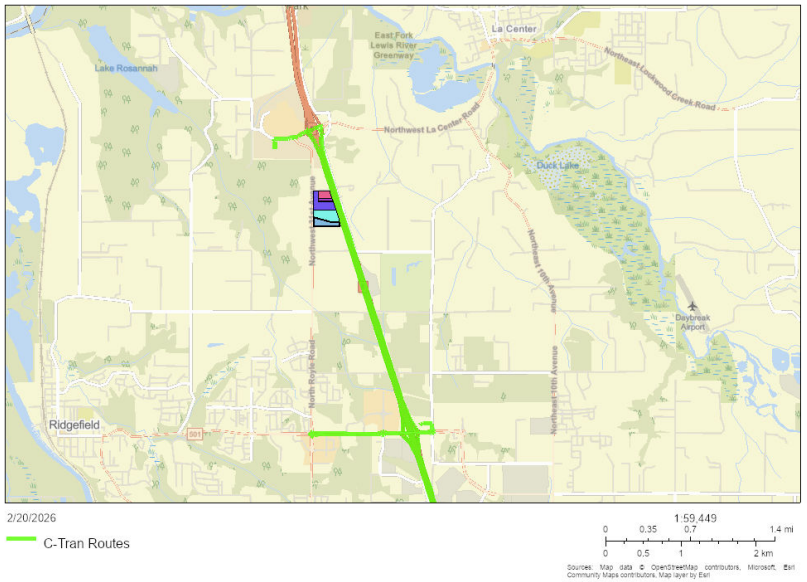
Sources: Map data © OpenStreetMap contributors, Microsoft, Esri Community Maps contributors, Map layer by Esri, Clark County WA

GIS Fact Sheet - APN 211244000, 211241000, 211265000, 211208005, 211208000

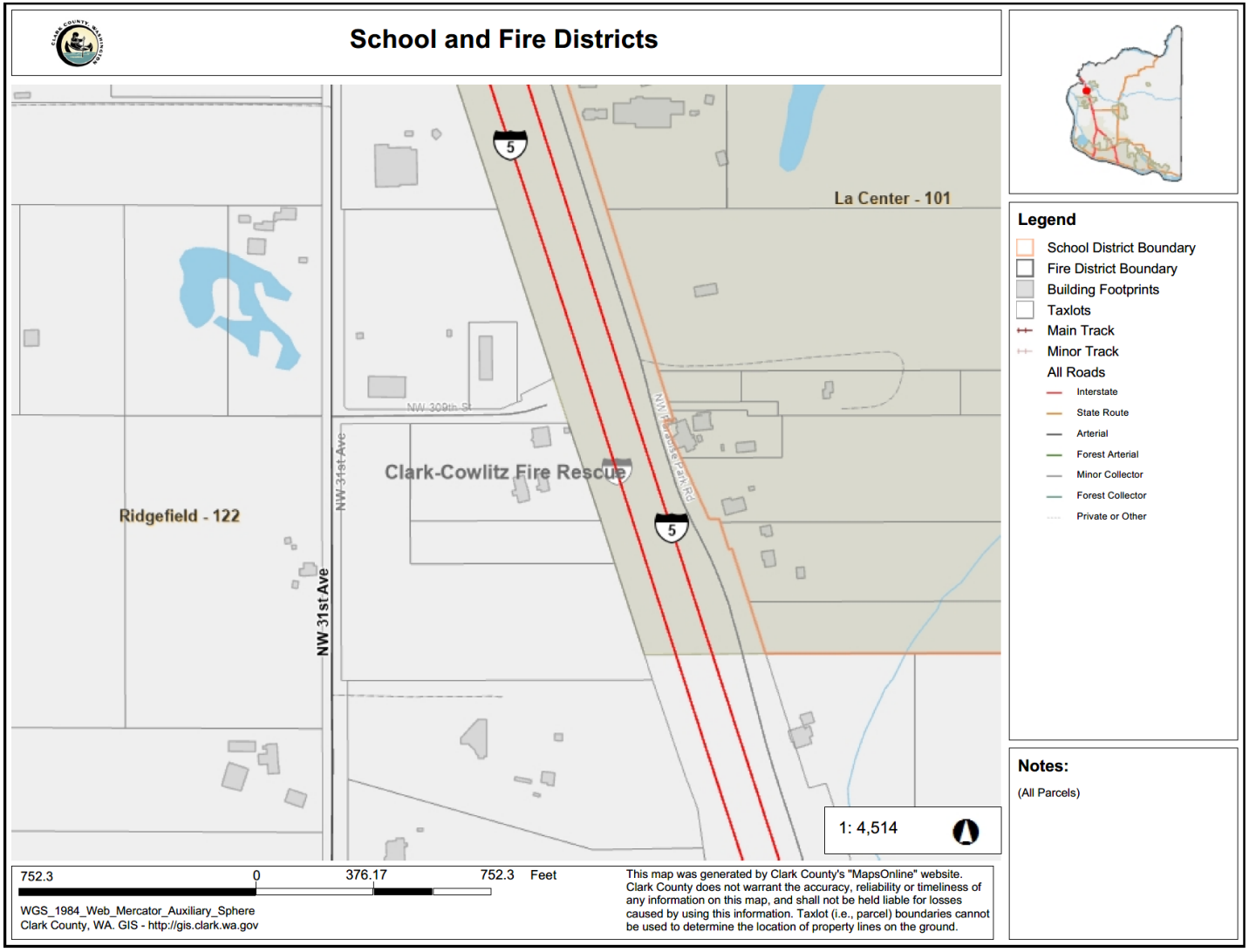
C-Tran Routes - All Parcels (211244000, 211241000, 211265000, 211208005, 211208000)



C-Tran Routes - All Parcels (211244000, 211241000, 211265000, 211208005, 211208000)



54613-78149 4897-3296-5777.5


School and Fire Districts
La Center - 101
Ridgefield - 122
Clark-Cowlitz Fire Rescue
NW 309th St
NW 31st Ave
NW 31st Ave
NW Paradise Park Rd
5
5
Legend
School District Boundary
Fire District Boundary
Building Footprints
Taxlots
Main Track
Minor Track
All Roads
Interstate
State Route
Arterial
Forest Arterial
Minor Collector
Forest Collector
Private or Other
Notes:
(All Parcels)
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752.3 0 376.17 752.3 Feet
WGS_1984_Web_Mercator_Auxiliary_Sphere
Clark County, WA. GIS - http://gis.clark.wa.gov
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E. Dalmation Dr, E Airedale Dr, and E 24th Ave – La Center



Photo taken from E 24th Avenue facing southwest Photo shows ongoing residential construction. Photo taken 9-14-2026.

E. Dalmation Dr, E Airedale Dr, and E 24th Ave – La Center



Photo taken from E 24th Avenue facing southwest. Photo shows ongoing residential development. Photo taken 9-14-2026.



Photo taken from E Airedale Avenue facing southwest. Photo shows ongoing residential construction. Photo taken 9-14-2026.



Photo taken from E Airedale Avenue facing south. Photo shows ongoing residential construction. Photo taken 9-14-2026.



Photo taken from E Airedale Avenue facing east. Photo shows ongoing residential construction. Photo taken 9-14-2026.



Photo taken from E Airedale Avenue facing west. Photo shows ongoing residential construction. Photo taken 9-14-2026.



Photo taken from W 19th St facing north. Photo shows ongoing residential construction. Photo taken 9-14-2026.



Photo taken from W 20th Way facing north. Photo shows residential development. Photo taken 9-14-2026.



Photo taken from W 20th Way facing north. Photo shows plots available for residential development by New Tradition Homes. Photo taken 9-14-2026.



Photo taken from E Otter Loop facing east. Photo shows ongoing residential construction. Photo taken 9-14-2026.



Photo taken from E Otter Loop facing north. Photo shows ongoing residential construction. Photo taken 9-14-2026.



Photo taken from E Otter Loop facing north. Photo shows ongoing residential construction. Photo taken 9-14-2026.



Photo taken from E Otter Loop facing west. Photo shows ongoing residential construction. Photo taken 9-14-2026.



Photo taken from the sidewalk off 56th street facing west. Photo shows Costco building, Costco parking lot, and Costco gas station. Photo taken 9-14-2026.



Photo taken from the sidewalk off N 56th Place street facing north. Photo shows north end of N 56th Place and entry into Costco parking lot. Photo taken 9-14-26.



Photo taken from sidewalk of N 56th Place facing east. Photo shows new commercial buildings for lease. Photo taken 9-14-26.



Photo taken from sidewalk of N 56th Place facing east. Photo shows zoomed in image of prior photo of new commercial buildings for lease. Photo taken 9-14-26.



Photo taken from sidewalk of N 56th Place facing east. Photo shows new commercial buildings, including In-and-Out and Dental Care of Union Ridge. Photo taken 9-14-26.



Photo taken from sidewalk of N 56th Place facing south. Photo shows roundabout intersection of N 56th Place and Pioneer Canyon Drive, including construction on property southwest of the roundabout. Photo taken 9-14-26.



Photo taken from sidewalk of N 56th Place facing north. Photo shows Costco parking lot view from roundabout intersection of N 56th Place and Pioneer Canyon Drive. Photo taken 9-14-26.



Photo taken from sidewalk of N 56th Place facing south. Photo shows commercial development on N 56th Place. Photo taken 9-14-26.

Neighborhood off of NW Hillhurst Rd in Ridgefield, Washington (S. Arwana Lane and surrounding area)



Photo taken from S 36th Drive facing northeast. Photo shows ongoing residential construction. Photo taken 9-14-2026

Neighborhood off of NW Hillhurst Rd in Ridgefield, Washington (S. Arwana Lane and surrounding area)



Photo taken from S 36th Drive facing north. Photo shows wash pit and ongoing residential construction. Photo taken 9-14-2026

Neighborhood off of NW Hillhurst Rd in Ridgefield, Washington (S. Arwana Lane and surrounding area)



Photo taken from S 36th Drive facing north. Photo shows ongoing residential construction. Photo taken 9-14-2026

Neighborhood off of NW Hillhurst Rd in Ridgefield, Washington (S. Arwana Lane and surrounding area)



Photo taken from S 36th Drive facing northwest. Photo shows ongoing residential construction. Photo taken 9-14-2026.

Neighborhood off of NW Hillhurst Rd in Ridgefield, Washington (S. Arwana Lane and surrounding area)



Photo taken from intersection of S 36th Dr and S 44th Lane. Photo shows ongoing residential construction. Photo taken 9-14-2026.

Neighborhood off of NW Hillhurst Rd in Ridgefield, Washington (S. Arwana Lane and surrounding area)



Photo taken from S 44th Lane facing north. Photo shows residential construction within residential neighborhood. Photo taken 9-14-2026.

Neighborhood off of NW Hillhurst Rd in Ridgefield, Washington (S. Arwana Lane and surrounding area)



Photo taken from Green Pastures Drive. Photo shows ongoing residential development. Photo taken 9-14-2026.



Photo taken from N 12th Way. Photo shows ongoing residential construction. Photo taken 9-14-2026.



Photo taken from N 12th Way. Photo shows ongoing residential construction. Photo taken 9-14-2026.



Photo taken from Paradise Avenue and N 15th Way. Photo shows existing residential homes and ongoing residential construction on N 15th Way. Photo taken 9-14-2026.



Photo taken from intersection of Paradise Ave and N 16th Way. Photo shows ongoing residential construction. Photo taken 9-14-2026.



Photo taken from intersection of Paradise Ave and N 16th Way (different angle from prior photo). Photo shows ongoing residential construction. Photo taken 9-14-2026.



Photo taken from Paradise Ave facing northeast, taken north of the intersection of Paradise Avenue and N 16th Way. Photo shows residential construction on Paradise Ave. Photo taken 9-14-2026.



Photo taken from Paradise Ave facing northwest, taken north of the intersection of Paradise Avenue and N 16th Way. Photo shows residential construction off of N 16th Way and N 41st Ct. Photo taken 9-14-2026.



Photo taken from intersection of Paradise Avenue and N 16th Way facing west. Photo shows residential construction off of N 16th Way. Photo taken 9-14-2026.



Photo taken from intersection of Paradise Avenue and N 16th Way facing west (different angle of prior photo). Photo shows residential construction off of N 16th Way. Photo taken 9-14-2026.



Photo taken from N 43rd Avenue as it turns into N 16th Way. Photo shows ongoing residential construction. Photo taken 9-14-2026.



Photo taken from intersection of N 43rd Avenue and N 18th Circle. Photo shows ongoing residential construction. Photo taken 9-14-2026.



Photo taken from NW 289th St facing south. Photo shows sign from "Cascade West" about "Design and Build – Award Winning Homes". Photo taken 9-14-2026.



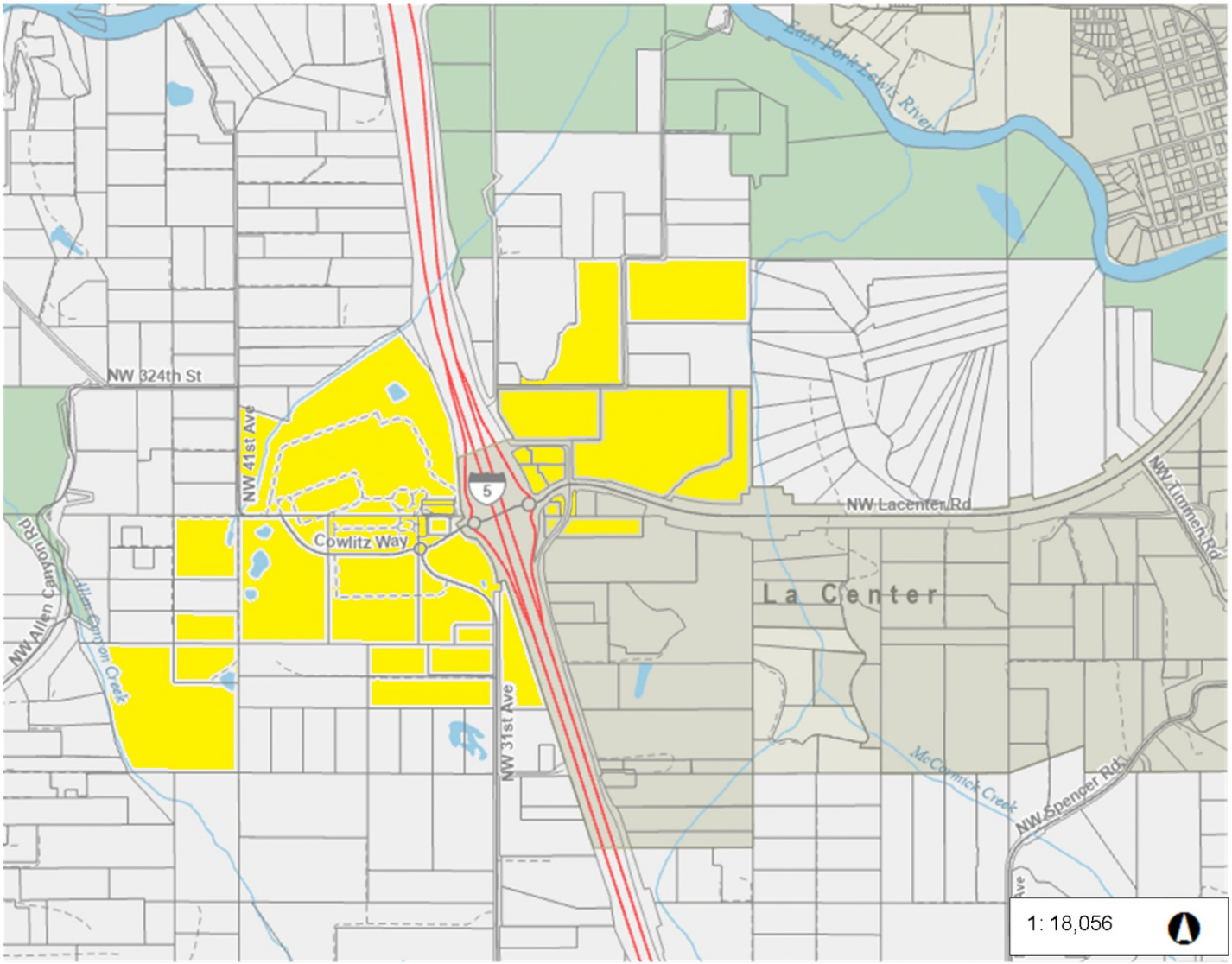
Photo taken from Storybrook Hollow Park. Photo taken 9-14-2026.

Paradise Point Neighborhood in Ridgefield, Washington



Photo taken from Storybrook Hollow Park. Photo taken 9-14-2026.

Cowlitz Tribe and Affiliates Ownership





Legend

- Taxlots

Notes:

3,009.3 0 1,504.67 3,009.3 Feet

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

This map was generated by Clark County's "MapsOnline" website. Clark County does not warrant the accuracy, reliability or timeliness of any information on this map, and shall not be held liable for losses caused by using this information. Taxlot (i.e., parcel) boundaries cannot be used to determine the location of property lines on the ground.