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January 12, 2026

VIA FIRST CLASS MAIL AND EMAIL
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Clark County Board of County Councilors
Attn: Sue Marshall, Glen Yung, Michelle Belkot,
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PO Box 5000
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Clark County Planning Commission
c/o Jeff Delapena
Attn: Jack Harroun, Alicia LeDuc Montgomery, Kyle Fadness,
Mark Bergthold, Ron Barca, Karl Johnson and Bryan Halbert
PO Box 9810
Vancouver, WA 98666-9810

Re: Ridgefield request for the preferred alternative: Alternative 2.D.

Dear County Councilors and Planning Commission:

We represent Hinton Services, LLC ("Hinton"), who developed the roundabout at Pioneer and 65th Street in Ridgefield and has been developing successful residential and mixed-use projects in Ridgefield and across Clark County for over 30 years. Hinton is under contract to purchase approximately 64 acres known as the "Jones/McPherson Property" (APN 212566000, 212590000 and APN 212584000).

The Jones/McPherson Property is labelled Area 12 on the March 20, 2025, map the City of Ridgefield submitted to the County in its request for expansions to be included in the preferred alternative, a copy of which is attached to this letter.

We support the City of Ridgefield's request to include the Jones/McPherson Property in Alternative 2.D and in the new UGA to be adopted with the upcoming comprehensive plan. This letter provides the legal basis for Clark County to de-designate the Jones/McPherson Property and include it in the Ridgefield UGA.

1. **County staff made a mapping error of omission that we request be corrected.**

As shown on the March 20, 2025, map the City of Ridgefield submitted to the County in its request for expansions to be included in the preferred alternative, The City of Ridgefield's request for

Alternative 2 (the preferred alternative) included three areas: Area 2.a (Maul Property), Area 11 (Northern Industrial Urban Reserve Area) and Area 12 (Jones/McPherson Property).

At the January 8 hearing staff recommended against Alternative 2.D, but Mr. Alvarez only showed Area 11 on the County map for Alternative 2.D. Mr. Alverez omitted Area 2.a and Area 12. The Alternative 2 map on the County website also omits Area 2.a and Area 12 from the Alternative 2 map.

It is unclear why the County omitted Area 2.a and Area 12 from the 2.D map when the City of Ridgefield clearly requested these areas to be included in the preferred alternative, as shown by the attached map from March 20, 2025.

We request this omission be corrected. Based on the City of Ridgefield's request that Areas 11, 12 and 2.a be included in the preferred alternative, all three of these areas should be considered in the discussion of Alternative 2.D.

We request this mapping omission be corrected and that all three areas that the City requested be included in the preferred alternative be considered with Alternative 2.D.

Further, based on the legal analysis set forth below, Clark County should grant the City of Ridgefield's request to include Alternative 2.D (including Areas 11, 12 and 2.a) in the preferred alternative for the Ridgefield UGA.

2. **Clark County is misapplying the law – economic viability of farming must be considered under the Lewis County case.**

At the January 8 hearing, Commissioner asked why the County had not considered economic viability of farming. Chris Cook gave an incorrect legal response to this question. Ms. Cook stated that in the appeal of the 2007 comp plan, the court of appeals and supreme court had "shot down" the argument that economic viability of farming could be considered in a de-designation.

This is not at all what the courts said in the appeal of the 2007 comp plan. The supreme court did not discuss economics at all in its decision, which was focused solely on annexation. *Clark Cnty. v. W. Washington Growth Mgmt. Hearings Rev. Bd.*, 177 Wash. 2d 136, 140, 298 P.3d 704, 706 (2013)

In the appeal of the 2007 growth plan, the court **NEVER** said the County could not consider whether farming was an economically viable use of the land. What the court of appeals said was the County could not prioritize the economic benefits of urbanization over farming:

> Although neither the GMA nor WAC prioritizes the WAC factors, the Growth Board correctly determined that the County committed clear error because it focused almost exclusively on diversifying La Center's economy and other economic considerations while ignoring the other WAC factors and local agricultural needs. Our Supreme Court previously suggested that economic considerations cannot be

> outcome determinative because "[p]resumably, in the case of agricultural land, it will always be financially more lucrative to develop such land for uses more intense than agriculture." *Redmond*, 136 Wash.2d at 52, 959 P.2d 1091.

Clark Cnty. Washington v. W. Washington Growth Mgmt. Hearings Rev. Bd., 161 Wash. App. 204, 242–43, 254 P.3d 862, 880 (2011), vacated in part sub nom. *Clark Cnty. v. W. Washington Growth Mgmt. Hearings Rev. Bd.*, 177 Wash. 2d 136, 298 P.3d 704 (2013).

The law does not preclude consideration of whether farming is an economically viable use of the land. The law merely prohibits other economic considerations (such as urban development) from being given priority over farming because urban development will always be more profitable than farming. Nevertheless, land cannot have "commercial" significance for farming if the land is incapable of supporting a commercially profitable farm.

County staff's analysis conflates prioritizing the economic benefits of urbanization with considering whether farming is an economically viable use of the land. These are two very different concepts.

In the 2007 comp plan appeal, the County wasn't arguing (at least not in the courts) that farming was not an economically viable use of the land. Rather, the County was arguing that urbanization provided a far greater economic benefit to the City of LaCenter:

> The County's clearly stated reasons for dedesignating these parcels were beliefs that (1) the parcels had a "special value" (AR at 24080) that provided more economic benefit to La Center as developed land than it would as agricultural land and (2) the lands would help "diversify the La Center economy." AR at 15.27

Clark Cnty. Washington v. W. Washington Growth Mgmt. Hearings Rev. Bd., 161 Wash. App. 204, 242, 254 P.3d 862, 880 (2011), vacated in part sub nom. Clark Cnty. v. W. Washington Growth Mgmt. Hearings Rev. Bd., 177 Wash. 2d 136, 298 P.3d 704 (2013). This was the argument the courts rejects.

There is no case holding that Clark County cannot consider whether farming is an economically viable use of the land in making a de-designation decision.

In fact, state law, as interpreted by the Washington Supreme court in the *Lewis County* case **REQUIRES** the County to consider whether it is economically viable to conduct farming operations in making a de-designation decision in order to determine whether the land has long term **commercial** significance for farming.

3. State law REQUIRES Clark County to consider whether it is economically viable to conduct farming operations in making a de-designation decision.

The court of appeals in the 2007 comp plan appeal quoted the *Lewis County* case for the definition of agricultural land:

> Our Supreme Court summarized the working definition of "agricultural land" under the GMA as
>
> land: (a) not already characterized by urban growth (b) that is primarily devoted to the commercial production of agricultural products enumerated in RCW 36.70A.030(2), including land in areas used or capable of being used for production based on *232 land characteristics, and (c) that **has long-term commercial significance for agricultural production**, as indicated by soil, growing capacity, **productivity**, and whether it is near population areas or vulnerable to more intense uses. We further hold that counties may consider the development-related factors enumerated in [former] WAC 365–190–050(1) [(1991)] in determining which lands have long-term commercial significance.
>
> *Lewis County*, 157 Wash.2d at 502, 139 P.3d 1096.

Clark Cnty. Washington v. W. Washington Growth Mgmt. Hearings Rev. Bd., 161 Wash. App. 204, 231–32, 254 P.3d 862, 874 (2011), vacated in part sub nom. *Clark Cnty. v. W. Washington Growth Mgmt. Hearings Rev. Bd.*, 177 Wash. 2d 136, 298 P.3d 704 (2013).

If it is not economically viable to farm a parcel due to low productivity and other WAC factors, how could it have long-term **commercial** significance? In order to have commercial significance, the land must be capable of turning a profit from farming.

The term "commercial" is not defined in the statute but an ordinary dictionary definition is "viewed with regard to profit." https://www.merriam-webster.com/dictionary/commercial

If it is completely unprofitable to farm a parcel (in other words if it is not economically viable), then how could the parcel have any long-term commercial significance?

It seems like Orwellian doublespeak to argue that a parcel that has no economic viability for farming somehow has "long term commercial significance." Under the *Lewis County* case, Clark County must consider whether there is any economic viability of farming in its analysis of whether to de-designate land since that is the central question to be answered by looking at the WAC factors.

In the *Lewis County* case, the Washington Supreme Court specifically held that counties can consider whether the land is incapable of being used for agricultural production due to economic constraints and that the Hearings Board erred in concluding otherwise:

> As noted above, the GMA's stated intent is to recognize the "broad ... discretion" of counties to make choices within its confines. RCW 36.70A.3201. Because the GMA does not dictate how much weight to assign each factor in determining which farmlands have long-term commercial significance, and because RCW 36.70A.030(10) includes the possibility of more intense uses among factors to consider, it was not "clearly erroneous" for Lewis County to weigh the industry's anticipated land needs above all else. **If the farm industry cannot use land for agricultural production due to economic, irrigation or other constraints**, the possibility of more intense uses of the land is heightened. **RCW 36.70A.030(10) permits such considerations in designating agricultural lands**. Indeed, Manke involved some of the same considerations cited in the Lewis County staff report, undersized parcels and possible conflicts with nearby development. **Therefore, the Board erred** in concluding that Lewis County violated the GMA by designating agricultural lands based on the local farm industry's anticipated needs.

Lewis Cnty. v. W. Washington Growth Mgmt. Hearings Bd., 157 Wash. 2d 488, 503, 139 P.3d 1096, 1103 (2006). The *Lewis County* court only faulted the County for not explaining "the extent to which the county applied the specified factors," not for considering "economic, irrigation or other constraints," which the court held were appropriate considerations. *Id.*

4. The Jones/McPherson Property does not have long-term commercial significance.

At the January 8 hearing, the representative of the County's Agricultural Commission testified that agricultural land viability should be considered and any de-designation must be "based on defensible criteria-based analysis consistent with GMA requirements." This letter provides such analysis.

Based on the City of Ridgefield's testimony at the January 8 hearing and the attached report by Johnson Economics, the Jones/McPherson Property does not have long-term commercial significance for agriculture under the definition from the *Lewis County* case and the WAC factors.

WAC 365-190-050(c) lists the following factors, which the WAC specifies is a "nonexclusive" list of factors:

> (i) The classification of prime and unique farmland soils, and farmlands of statewide importance, as mapped by the Natural Resources Conservation Service;
>
> (ii) The availability of public facilities, including roads used in transporting agricultural products;

> (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;
>
> (iv) The availability of public services;
>
> (v) Relationship or proximity to urban growth areas;
>
> (vi) Predominant parcel size, which may include smaller parcels if contiguous with other agricultural resource lands;
>
> (vii) Land use settlement patterns and their compatibility with agricultural practices;
>
> (viii) Intensity of nearby land uses;
>
> (ix) History of land development permits issued nearby;
>
> (x) Land values under alternative uses; and
>
> (xi) Proximity to markets.

Economic viability of farming isn't a factor, it is the ultimate question because if there is no economic viability, the land cannot have long-term **commercial** significance for agriculture.

Each of the WAC factors is discussed in the Johnson Economics report and below:

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

Based on the soils types shown in the Johnson Economics report, the Jones/McPherson Property is a mixture of prime and non-prime soils. But this is not the only factor to be considered and it is outweighed by the other factors, as discussed below.

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

Pubic facilities are available for urban development, but there are no public facilities specifically supporting agricultural uses in the nearby vicinity.

(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;

The Jones property is in agricultural deferral current use but the McPherson property is not. However, this factor does not support a finding that the property has long term commercial

significance for agriculture based on Mr. Jones testimony that despite his best efforts, he has not been able to turn enough profit on farming to pay the property taxes, even at the reduced property tax rates of the current use program. Any commercial farming enterprise would need to at least generate enough revenue to pay for the fixed costs such as property taxes. Since the Jones property cannot even do that and the McPherson property is not in current use, this factor weighs in favor of de-designation.

(iv) The availability of public services;

Based on the Johnson Economics report, public services are readily available, so this factor weighs in favor of de-designation.

(v) Relationship or proximity to urban growth areas;

This factor weighs heavily in favor of urbanization since the Jones McPherson Property borders the existing UGA on two sides.

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

The Jones/McPherson Property has a mix of parcel sizes consisting of four parcels: 38 acres (less than half of which is being farmed), 20 acres, 6.44 acres and 0.24 acres. Surrounding parcels include two parcels that are about 6 acres each, one 15-acre parcel and three 1.3-acre parcels to the east. To the south and west, the property is in the UGA and is either developed to urban densities or soon will be. This factor is at best mixed and is not strongly against de-designation, since several of the subject parcels and surrounding parcels are too small for commercial farming.

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

Given the existing urban subdivisions adjacent to the west, and anticipated development of a school to the south, the land settlement patterns are not compatible with agricultural practices and this factor weighs in favor of de-designation.

(viii) Intensity of nearby land uses;

Given the urban intensity of development to the west and anticipated school to the south, this factor weighs in favor of de-designation.

(ix) History of land development permits issued nearby;

As detailed in the Johnson Economics report, six subdivisions have been recently approved within a mile of the Jones/McPherson Property for 643 new homes, with another 875 currently uncer construction and in planning. Eight commercial and industrial permits for over 1.37 million square feet have been issued in the past 8 years and permits for a Clark College expansion and an elementary school. This factor strongly supports de-designation.

(x) Land values under alternative uses; and

Land values under alternative uses would obviously be much higher than any land value for agriculture.

(xi) Proximity to markets.

The Jones/McPherson Property has no particularly close proximity to any agricultural markets. The blackberries that have been grown have been sold to Willamette Valley Fruit Company in Salem, Oregon over 70 miles away. This factor supports de-designation.

Based on a totality of these factors, and overall lack of productivity of this property that is discussed in more detail in Mr. Jones testimony and on pages 17-18 of the attached Johnson Economics report, the Jones/McPherson Property does not have "long-term commercial significance for agriculture" and therefore should be de-designated and urbanized.

5. Other criteria for de-designation are met.

Urban areas can be expanded into agricultural land when "no other option is available" (WAC 365-196-310(4)(c)(v)). As Steve Stuart testified at the January 8 hearing, the City of Ridgefield is ringed with agricultural land. If the City is to meet its obligation to provide a 20-year land supply as required under GMA, there is no other option but to expand into land designated for agriculture. Therefore WAC 365-196-310(4)(c)(v) is met.

In order to de-designate agricultural lands and bring them into the UGA, "counties must conduct a comprehensive countywide analysis consistent with WAC 365-190-040(10)" (WAC 365-190-050(1)). Now that the Board of County Councilors have completed the required comprehensive countywide agricultural lands study, which is a necessary step to de-designating agricultural land during the 2025 growth management planning cycle, the County may de-designate the Jones/McPherson Property and bring it into the UGA.

The process required by WAC 365-190-040(10) is "a comprehensive countywide analysis" that analyzes "cumulative impacts from de-designations can adversely affect the ability of natural resource-based industries to operate" and also looks at "the viability of natural resource lands and associated industries through conversion to incompatible land uses, and through operational interference on adjacent lands."

The comprehensive countywide agricultural lands study identifies no cumulative impacts would be caused by urbanization of the Jones/McPherson Property. In fact, the comprehensive countywide agricultural lands study found that similar agricultural land to be prevalent throughout Clark County, so the loss of a mere 64 acres that is already impacted by urban growth will have no adverse cumulative impacts.

We therefore respectfully request the County Board of Councilors to include these parcels in Alternative 2.D, to approve Alternative 2.D for inclusion in the preferred alternative, ultimately include these parcels in the new UGA.

Sincerely,

LANDERHOLM, P.S.

STEVE C. MORASCH
Attorney at Law
SCM/lls

HINS01-000046 – 7467841.1

cc: Christine Cook
Oliver Orjiako
Steve Stuart
Claire Lust

JOHNSON
ECONOMICS



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

PREPARED FOR
HINTON DEVELOPMENT
SEPTEMBER 2025

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
JONES PROPERTY BACKGROUND 2
MCPHERSON PROPERTY BACKGROUND 3
IV. CHARACTERIZATION OF URBAN GROWTH 5
V. CURRENT AGRICULTURAL PRODUCTION 10
JONES PROPERTY 10
MCPHERSON PROPERTY 11
VI. COMMERCIAL SIGNIFICANCE FOR AGRICULTURE 12
LAND CAPABILITY CLASSIFICATION 12
WATER RESOURCES 13
AVAILABILITY OF PUBLIC FACILITIES 13
AVAILABILITY OF PUBLIC SERVICES 13
TAX STATUS 14
PROXIMITY TO URBAN GROWTH AREAS 15
PARCEL SIZE 15
LAND USE PATTERNS & INTENSITY OF SURROUNDING LAND USE 15
HISTORY OF PERMITS ISSUED NEARBY 15
LAND VALUES UNDER ALTERNATIVE USES 16
PROXIMITY OF MARKETS 17
CROP PRODUCTIVITY 17
VII. THE STATE OF AGRICULTURE IN CLARK COUNTY 18
POPULATION & DEVELOPMENT TRENDS 20
VIII. RECOMMENDATIONS 22

I. INTRODUCTION

JOHNSON ECONOMICS was retained by HINTON DEVELOPMENT 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 Ridgefield urban growth boundary (UGB), and almost 650 new homes have been built within a mile of the property since 2017. Developed land close to the property is primarily residential, commercial, or industrial, though 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 four 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 for most crops, including berries, which are currently grown on the property. However, the productivity of farm operations is below a profitable level. The site holds some water right claims, including a certificate for irrigation, though the certificate does not specify the quantity of water that may be used.

The property is designated as agricultural 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 $2.94 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.

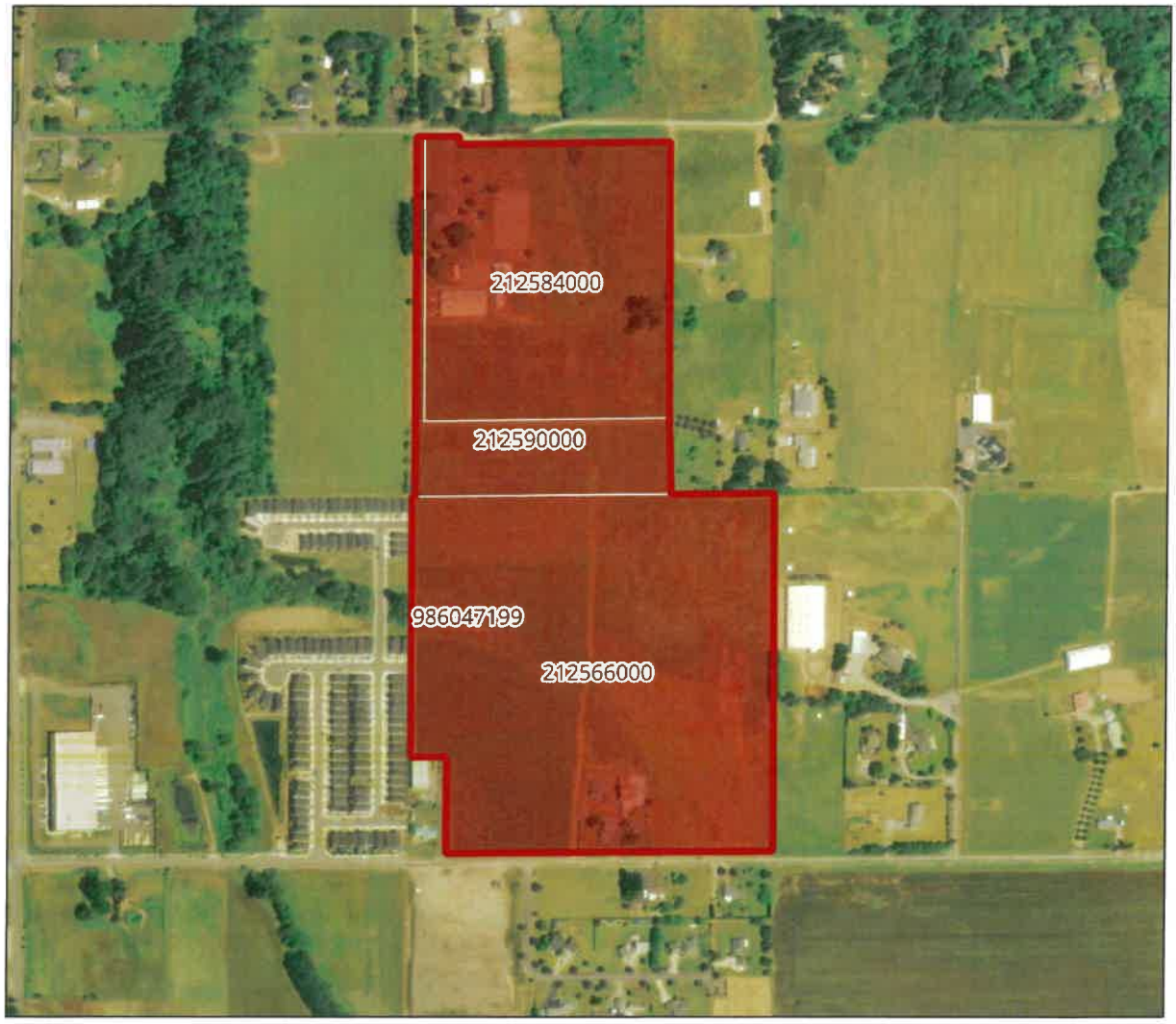
Ridgefield is also trending towards more residential and commercial use and less agricultural use. From 2017 to 2024, Ridgefield's population more than doubled, while over 3,900 new residential units (3,100 single-family homes) were permitted. Furthermore, over 1.7 million square feet of commercial and 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 four parcels that total 64.64 acres. The parcels are mapped with their ID numbers below. The three larger parcels (212584000, 212590000 and 212566000) are zoned for agricultural use, **and the small parcel (986047199) is zoned Commercial – Neighborhood Business (CNB)**.

FIGURE 3.1: PARCELS CONTAINED IN THE SUBJECT PROPERTY



SOURCE: Clark County, JOHNSON ECONOMICS

JONES PROPERTY BACKGROUND

Before 1989, the farm was owned by the Garland Pittman family and produced pole beans and hay. Gerald and Beverly Jones bought the property in 1989, continuing to grow hay. They also purchased cows from local dairy farmers and resold the cows after their first calf.

About 20 years ago, Gerald and Beverly Jones began leasing the farm to Jerry Dobbins. He rotated crops of strawberries, raspberries, blackberries, and fescue grass. The Jones farm was only 37 acres of 300-400 acres throughout Washington and Oregon that Dobbins farmed. In 2018, Brett Jones took over 17 acres of blackberry farming and has continued that operation. In 2019, Kevin Dobbins grew clover on the remaining 20 acres of the agricultural parcel, but that area is not being farmed now.

There are four buildings on the largest parcel. The main home and farm buildings were built between 1930 and 1940, and the smaller house was added prior to 1951; the exact construction years are unknown. According to the Clark County Assessor, the farm buildings are in fair to badly worn condition. There are no buildings on the other parcels.

FIGURE 3.2: BUILDINGS ON PARCEL 212566000, AERIAL VIEW, 2021



SOURCE: Google Earth, JOHNSON ECONOMICS

MCPHERSON PROPERTY BACKGROUND

David and Julie McPherson have owned the property since the mid-1990s. They raised cattle for several years, non-commercially. In more recent years, the property has supported three horses for personal use. The McPhersons discussed adding a horse boarding facility, but the logistics proved impracticable, and a facility was never built. The property has been hayed a few times, partially to feed the animals, though much of the hay produced was lower quality feed. Under its current ownership, the property has never been used for commercial agricultural purposes.

There are five buildings on the parcel. The home was first built in 1957 and was updated in the 1990s. The farm buildings were built from 1979 to 1982; these include a barn, two machinery sheds, and an arena. According to the Clark County Assessor, the farm buildings are in "average" condition.

FIGURE 3.3: BUILDINGS ON PARCEL 212584000, VIEW LOOKING SOUTH, 2024

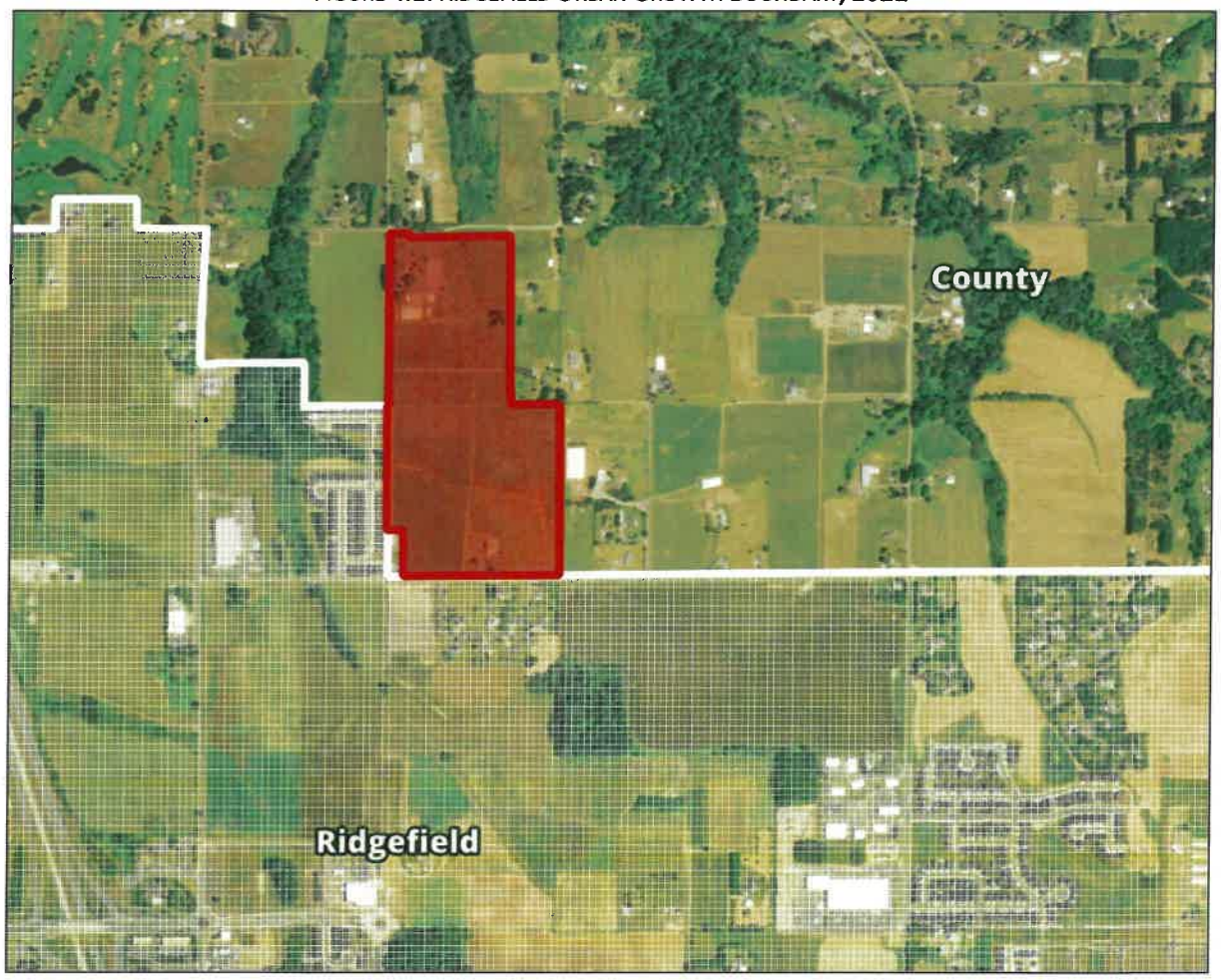


Three out of the four parcels are within the Current Use program and have been since the development of Clark County's comprehensive plan, adopted in the 1990s. Current Use allows open space, timber, agricultural, and forest lands to be taxed at the value of their current use, rather than at their assessed value. This 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. Clark County does not use the Public Benefit Rating System (PBRS), which is a tax deferment program similar to Current Use.

IV. CHARACTERIZATION OF URBAN GROWTH

The subject property is adjacent to the Ridgefield Urban Growth Boundary to the west and 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.

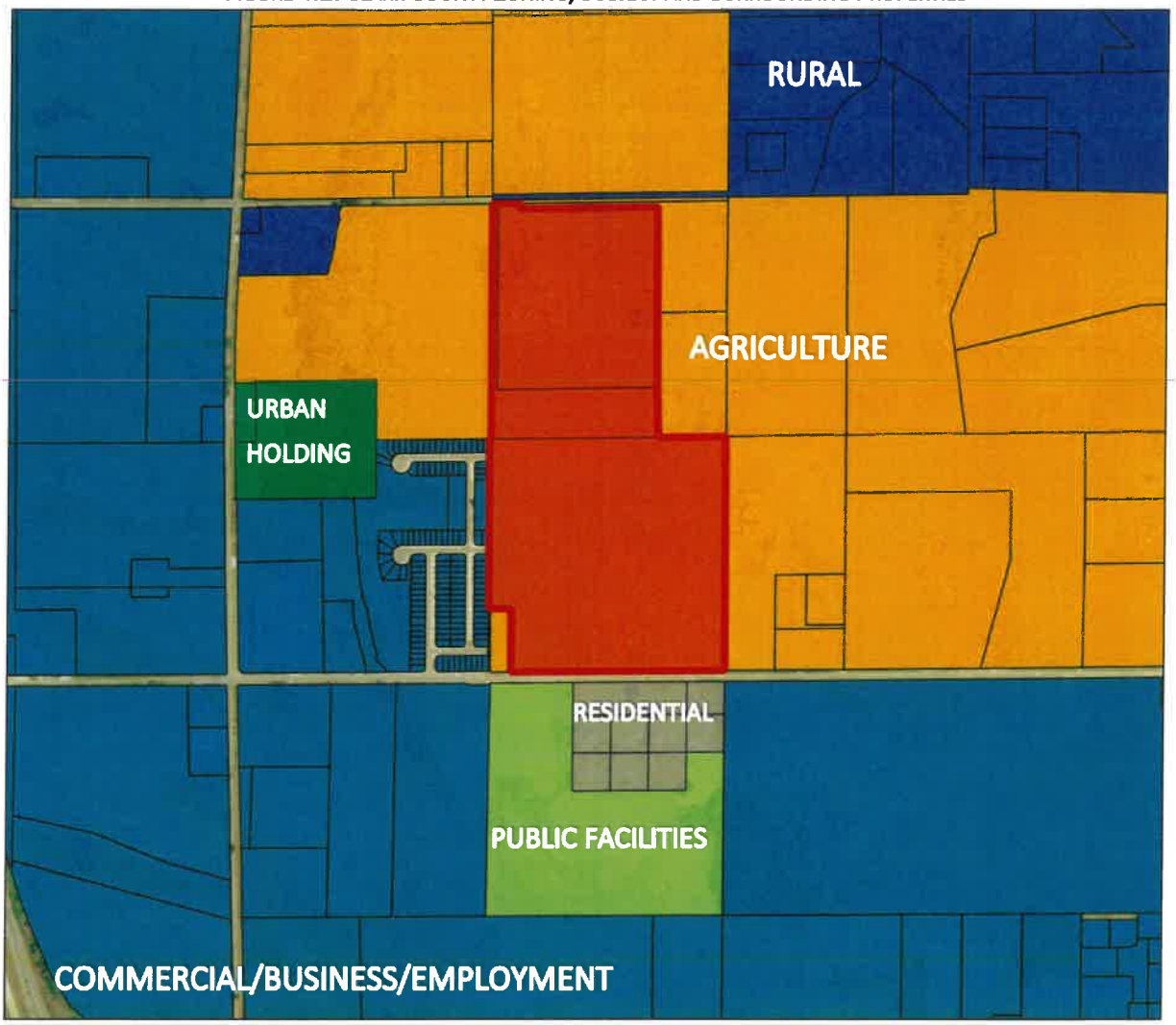
FIGURE 4.1: RIDGEFIELD URBAN GROWTH BOUNDARY, 2022



SOURCE: Clark County, JOHNSON ECONOMICS

The subject property is primarily zoned for agricultural use. Agricultural zoning continues to the north and east of the property. The land to the west and south of the subject property is zoned for commercial, business, and employment uses.

FIGURE 4.2: CLARK COUNTY ZONING, SUBJECT AND SURROUNDING PROPERTIES

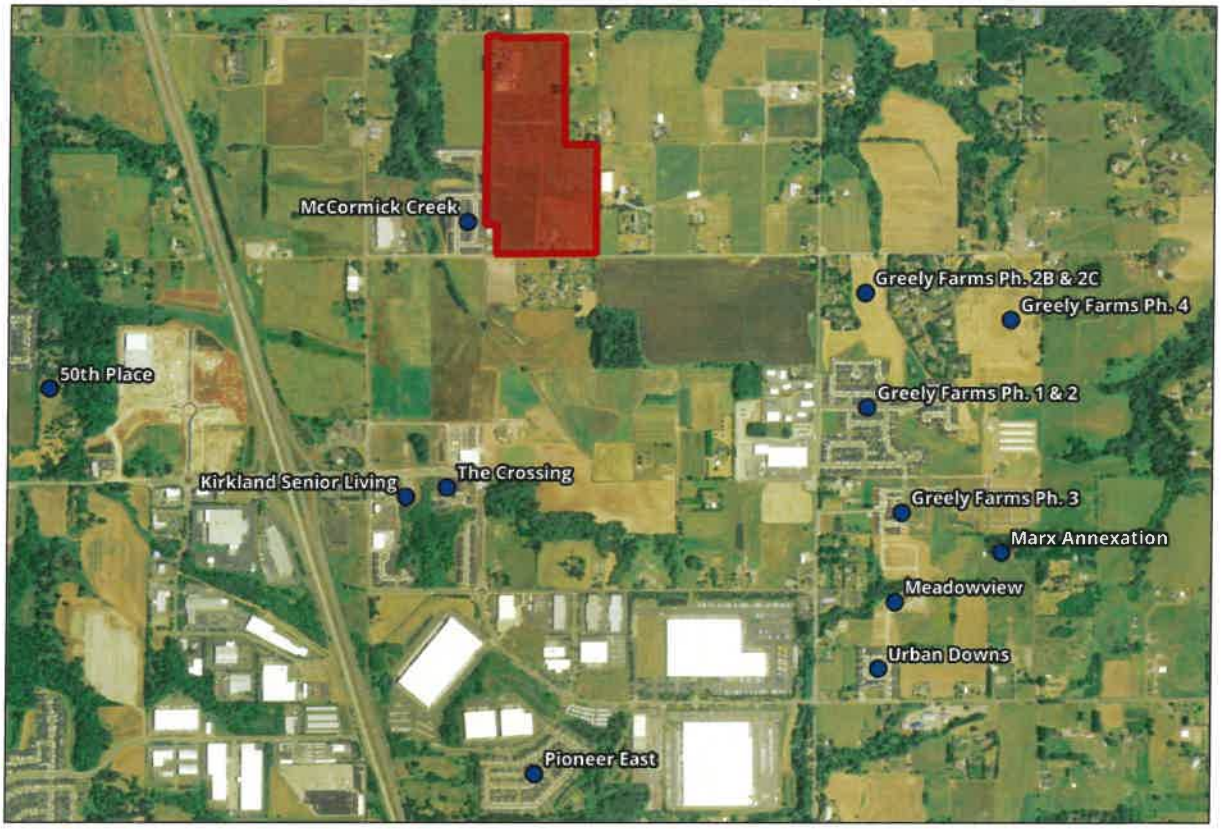


SOURCE: Clark County, JOHNSON ECONOMICS

Within about a mile of the subject property, five subdivisions have been built out since 2018. McCormick Creek, immediately to the left of the subject site, was completed in late 2023 and includes 90 homes. About half a mile to the south is The Crossing, a 132-unit townhome development completed in 2023, and south of that is Pioneer East, completed in 2022 with 209 units. Greely Farms to the southeast was built starting in 2019 with 185 units in its first two phases. The remaining phases, 2B & C and 3-4, are still under construction and will add 553 homes when completed. The last recently completed subdivision is Urban Downs, located just south of Greely Farms with 27

homes. Additionally, about 700 homes, including 148 apartment-style senior living units, are under construction, and 170 are in the planning stages. These developments are mapped below.

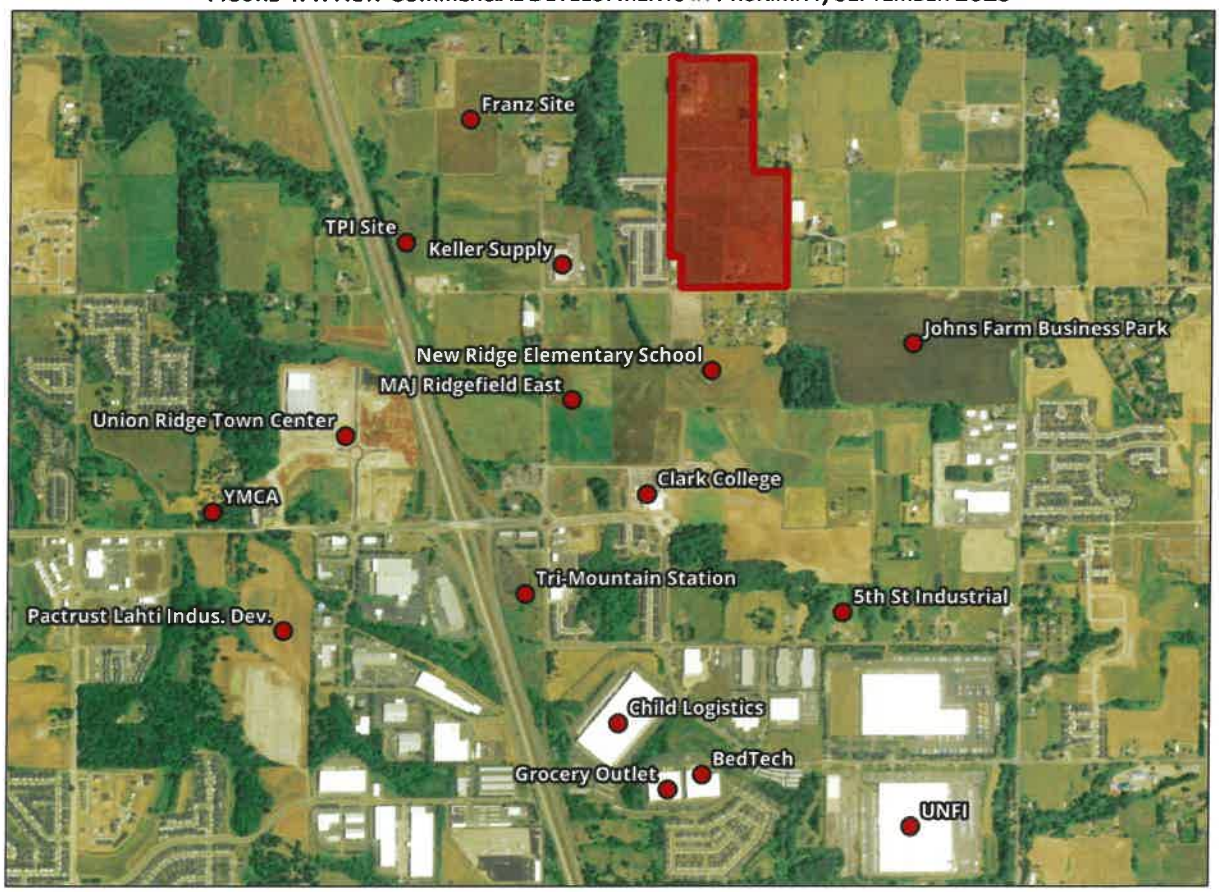
FIGURE 4.3: NEW RESIDENTIAL DEVELOPMENTS IN PROXIMITY, SEPTEMBER 2025



SOURCE: Clark County, City of Ridgefield, JOHNSON ECONOMICS

There are also several commercial, educational, and industrial developments within the same radius. New Ridge Elementary School, just south of the subject site, is under construction and expected to open in fall of 2026. Union Ridge Town Center to the west, anchored by a recently opened Costco, will have 14 small commercial sites when completed. Tri-Mountain Station, a nine-building commercial center, is under construction. Clark College at Boschma Farms, which opened in April 2025, specializes in advanced manufacturing technologies, reflecting Ridgefield's large industrial sector. The remainder are small to large warehouse buildings. These developments are mapped below.

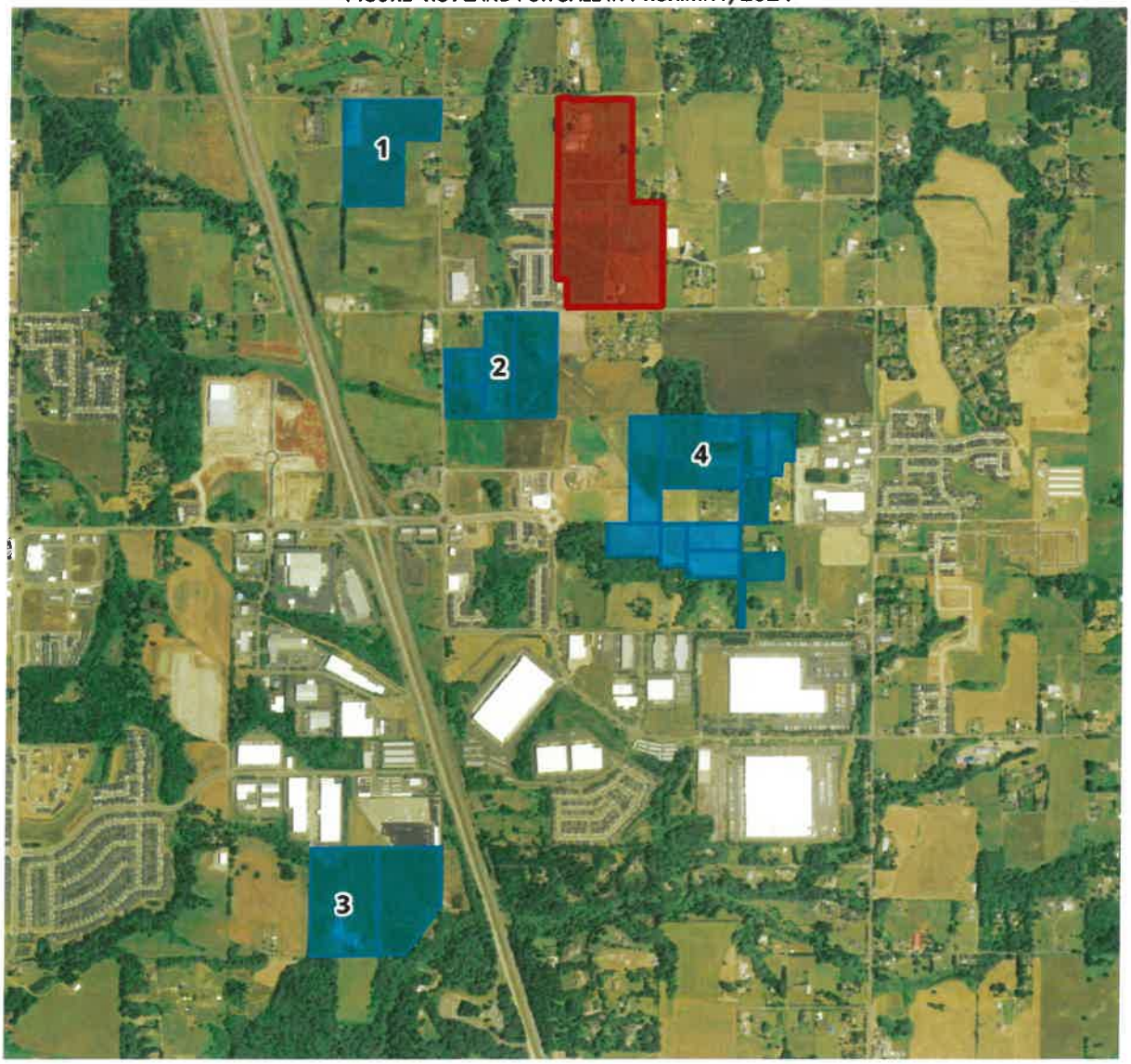
FIGURE 4.4: NEW COMMERCIAL DEVELOPMENTS IN PROXIMITY, SEPTEMBER 2025



SOURCE: Clark County, City of Ridgefield, JOHNSON ECONOMICS

Eight parcels near the subject site were listed for sale in early 2024 (clusters 1-3, shown below). There are also twelve parcels that were planned to be listed for sale later in 2024 (cluster 4, shown below). According to Clark County Land records, these parcels have not been sold since then. The parcels are advertised as zoned for commercial, employment, and industrial uses, though the parcels in clusters 2 and 4 are currently designated as agricultural land under Current Use.

FIGURE 4.5: LAND FOR SALE IN PROXIMITY, 2024



SOURCE: Clark County, local brokers, local media, JOHNSON ECONOMICS

V. CURRENT AGRICULTURAL PRODUCTION

JONES PROPERTY

About 17 acres of the subject property are currently being farmed with blackberries. Over the last 20-30 years, a variety of berries and grasses have been grown on this portion – parcels 212566000 and 986047199.

FIGURE 5.1: STREET VIEW OF BLACKBERRY FARMING, 2019



SOURCE: Google Earth, JOHNSON ECONOMICS

The remainder of parcel 212566000 (about 20 acres) is not being farmed, and the grass and weeds currently growing there are unsuitable for haying. There is no satellite imagery available.

Within half a mile from the subject site, there are several other small farms. To the east, there are three other blackberry farms; these have operated since at least 2015. A large agricultural property immediately to the southeast that produced corn in the mid-2010s is being developed for residential homes. This development seems to be in its final stages. An agricultural property to the northwest was a Christmas tree farm at some point, but does not currently appear to be farmed, and was recently listed for sale as employment land.

McPherson Property

Parcel 212584000 (about 20 acres) is not in farm use. Currently, the property supports three horses for personal, not commercial, use. The grass and hay on the property are of low to medium quality and are not considered to be commercially viable.

Figure 5.2 Street View of Parcel 212584000, 2012



SOURCE: Google Earth, Johnson Economics

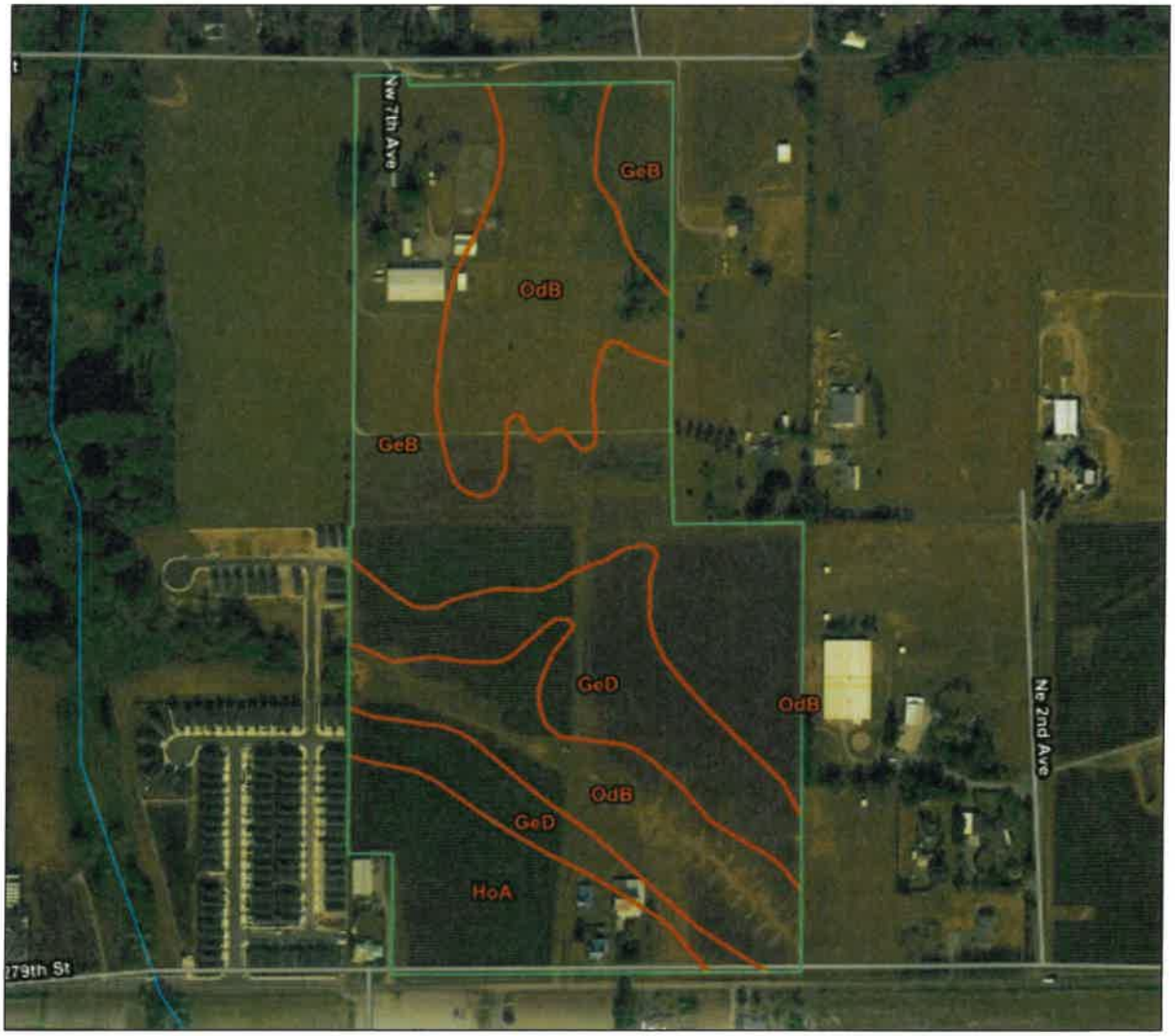
VI. COMMERCIAL SIGNIFICANCE FOR AGRICULTURE

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 on the north and east sides, is Gee silt loam (GeB and GeD), both 0-8 percent slopes and 8-20 percent slopes. These are Class II and IV soils, which, according to the Clark County Assessor, are suitable for most crops and pasture. There are also a few areas of Odne silt loam (OdB). This soil type is Class VI and generally not suitable for most crops. Lastly, the southwest corner is Hillsboro silt loam (HoA) and Class I, suitable for any crops.

FIGURE 6.1: USDA SOIL CLASSIFICATION, 2019



SOURCE: USDA Web Soil Survey, JOHNSON ECONOMICS

Water Resources

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

The surface water claim, S2-131778CL, is located on the northernmost parcel (212584000). It authorizes surface water uses for irrigation and stockwater purposes, though there is no specified place of use. On the same parcel is the first groundwater claim (G2-131779CL), which authorizes irrigation, stockwater, and domestic use. The second groundwater claim, G2-011093CL, is located on the southernmost parcel (212566000). It authorizes domestic water use only.

Parcel 212566000 is included in a surface water certificate, S2-*11791C, sourced from the East Fork of the Lewis River. This certificate permits irrigation and therefore farming of water-intensive crops such as berries. There is no place of use associated with this certificate, which appears to cover several additional parcels outside the subject property, so it is not possible to determine the exact amount of water allowed for irrigation on the parcel. The other parcels do not hold claims to water rights.

Importantly, 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. A claim statement, including the ones on file for the claims attached to the subject property, serves as "prima facie evidence of the times of use and the quantity of water the claimant was withdrawing or diverting as of the year of the filing." RCW 90.14.081.

Availability of Public Facilities

To the south of the subject property is North 10th Street/Northwest 279th Street, which has two travel lanes, each about 15 feet wide. These are separated by a double yellow line. There are no bike lanes or sidewalks. The posted speed limit is 35 miles per hour, and the closest intersection, North 10th Street and North 65th Avenue to the west, is controlled by stop signs on North 10th Street. North 65th Avenue is included in the Ridgefield Six-Year Transportation Improvement Plan (2024-2029) as a development-funded project; it will be completed by a private developer, as part of a larger project, rather than by the city. An additional road just south of the subject property is expected to be added within this time frame as well. To the north is Northwest 289th Street, which has no markings and becomes a gravel road soon after its intersection with the subject property.

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 boundary of the site. The jurisdiction recently extended the sewer line east from the planned Ridgefield Elementary School site on North 10th Street/Northwest 279th Street to North 10th Avenue. There is also a new pumping station for the residential homes in development on North 10th Avenue. Similarly, the Clark Public Utility District (CPU) installed new power lines and poles around the subject property.

Water is also provided by Clark Public Utilities. There is a CPU well just south of the property. The City of Ridgefield completed their Water System Plan in late 2024. It names water supply and storage as the two factors most limiting the city's growth. It also describes plans to expand water supply and storage, ensuring that Ridgefield can continue its growth.

Availability of Public Services

The subject property is less than half a mile northeast of the Clark-Cowlitz Fire Rescue Station 21, within the Clark-Cowlitz Fire District. It is about four miles east of the Ridgefield Police Department. The nearest medical center with

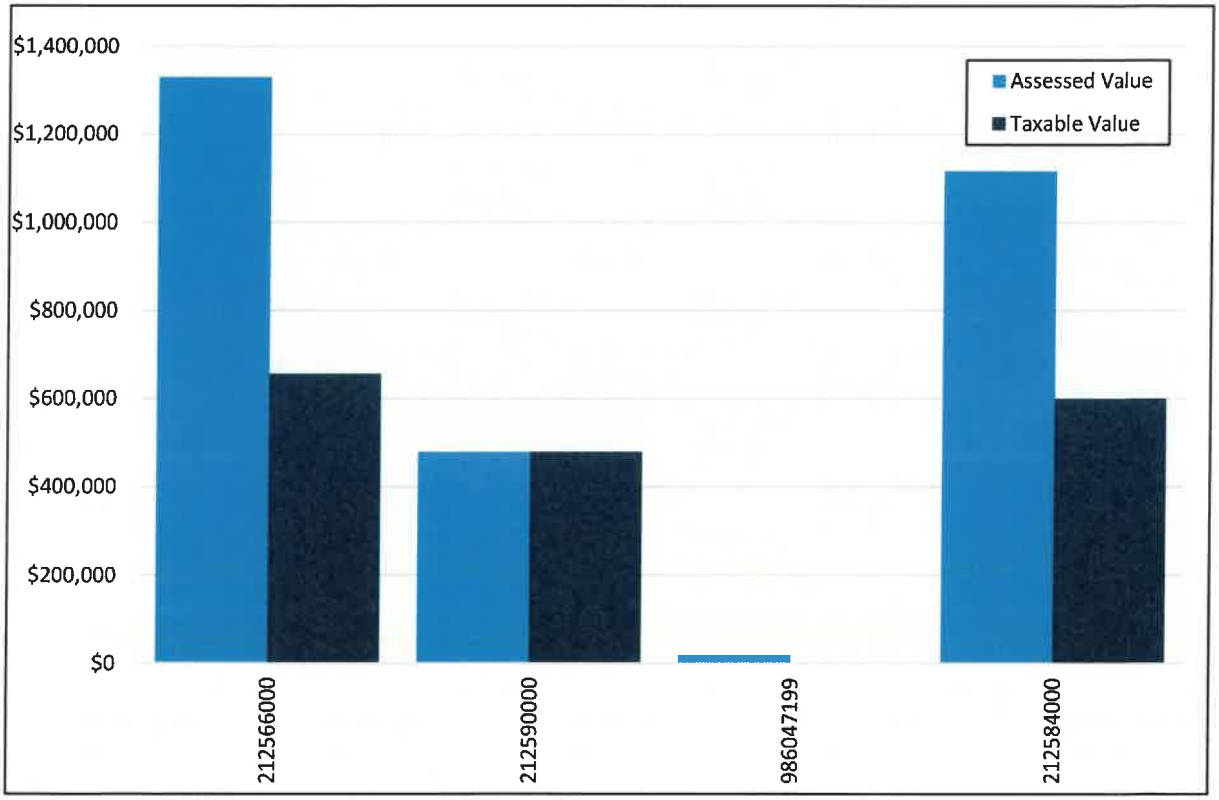
an emergency department is Legacy Salmon Creek Medical Center, about nine miles to the south of the subject property. There is a primary and urgent care clinic about a mile southwest of the subject property, on Pioneer Street.

The subject property is in the Ridgefield School District, about four miles west of Union Ridge Elementary School. However, the district began construction on a new elementary school on the large lot directly south of the subject property earlier this summer, funded by a capital levy passed in February. The elementary school is set to open in fall of 2026. The property is just over three miles from Ridgefield High School and View Ridge Middle School.

Tax Status

Three out of the four 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 6.2: Assessed Value and Taxable Value of Subject Parcels, 2025



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).

While the 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 be around $138,040. This includes $76,500 in back taxes from the properties owned by Gerald and Beverly Jones, and $61,540 from the property owned by Julie and David McPherson.

Proximity to Urban Growth Areas

The subject property is adjacent to the Ridgefield Urban Growth Boundary. It is within one mile of six residential projects that were recently built or that are under construction, with a total of over 800 new homes. Additionally, there are multiple commercial and industrial developments within a mile of the subject property. It is also adjacent to a lot planned for a new elementary school. This demonstrates proximity to urban growth areas.

Parcel Size

The largest of the parcels owned by the Jones family, which is the only one used for farming, is 38 acres. Less than half of the parcel (17 acres) is currently being farmed. The smaller parcel to the north of it is 6.44 acres, and the smallest parcel is 0.24 acres. The parcel owned by the McPherson family is 20.04 acres. These are significantly larger residential parcels in subdivisions around the site, which range from 0.06 to 0.17 acres. Industrial parcels slightly farther south range from 6 to 40 acres; these are similar in size to the parcels within the subject property.

Land Use Patterns & Intensity of Surrounding Land Use

To the east of the subject property there are more blackberry farms. To the north and south is Current Use-designated agricultural land, including a few parcels that have been farmed in the past but do not appear to be farmed currently. Immediately to the west is a 90-lot subdivision, McCormick Creek, which was built in 2021. Farther to the west 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 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 McCormick Creek 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 have been issued within one mile of the subject property. These have added 643 new homes to the area, not including 875 homes under construction and 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 1,370,000 completed square feet of commercial and industrial space. There are still 885,000 square feet under construction, and 120,000+ SF in early planning stages. Permits issued nearby indicate strongly that the subject property is characterized by urban growth.

FIGURE 6.3: RESIDENTIAL, COMMERCIAL, AND INDUSTRIAL BUILDING PERMITS ISSUED SINCE 2017

#	Project Name	Address	Status	Permit Year	Units
1	Marx Annexation	1920 NE 259th	Pre-Application	N/A	43
2	Greely Farms Ph. 4	NE 279th Street	L.U. Review	N/A	109
3	50th Place	NW 26th Ave	L.U. Review	N/A	16
4	Kirkland Senior Living	6625 Pioneer St	U.C.	2024	148
5	Meadowview	531 S 88th Ave	U.C.	2024	113
6	Greely Farms Ph. 3	S of Russet Pl	U.C.	2019	179
7	Greely Farms Ph. 2B & 2C	NE 10th Ave	U.C.	2019	265
8	The Crossing	441 S 69th Pl	Complete	2020	132
9	McCormick Creek Ph. 2	N 10th Ave & N Fairhope Pl	Complete	2019	90
10	Greely Farms Ph. 1 & 2	N 4th St & N Russet Pl	Complete	2019	185
11	Urban Downs	S Goose Loop & S 88th Ave	Complete	2019	27
12	Pioneer East	7143 S 11th St	Complete	2017	209
Total Residential Units					***1,516***

#	Project Name	Address	Type	Status	Permit Year	SF
13	YMCA	Pioneer St & N Discovery	Commercial	Pre-Application	N/A	46,400
14	Franz Site	N 20th St & N 65th Ave	Commercial	Pre-Application	N/A	37,000
15	TPI Site	N 10th St & I-5	Commercial	Pre-Application	N/A	38,161
16	Johns Farm Business Park	NE 279th St & NE 2nd St	Employment	Pre-Application	N/A	N/A
17	5th St Industrial	7752 S 5th St	Commercial	Pre-Application	N/A	N/A
18	MAJ Ridgefield East	N 65th Ave	Mixed Use	Pre-Application	N/A	N/A
19	Tri-Mountain Station	Pioneer St & S 65th Ave	Commercial	U.C.	2024	130,205
20	New Ridge Elementary	7025 N 10th St	Education	U.C.	2024	75,000
21	Union Ridge Town Center	Pioneer St & S 56th Pl	Commercial	U.C.	2023	255,850
22	Pactrust - Lahti Indus. Dev.	5145 Pioneer St	Industrial	U.C.	2022	424,000
23	Clark College	Pioneer St & NE 259th St	Education	Complete	2023	49,000
24	Child Logistics	7001 S Union Ridge Pkwy	Industrial	Complete	2021	468,810
25	Keller Supply Company	1200 N 65th Ave	Commercial	Complete	2019	55,868
26	Grocery Outlet Dist. Ctr.	7000 S 10th St	Industrial	Complete	2018	112,526
27	BedTech Ridgefield	7200 S 10th St	Industrial	Complete	2018	106,167
28	UNFI Dist. Ctr. Expansion	7909 S Union Ridge Pkwy	Industrial	Complete	2018	577,000
Total SF						***1,692,820***

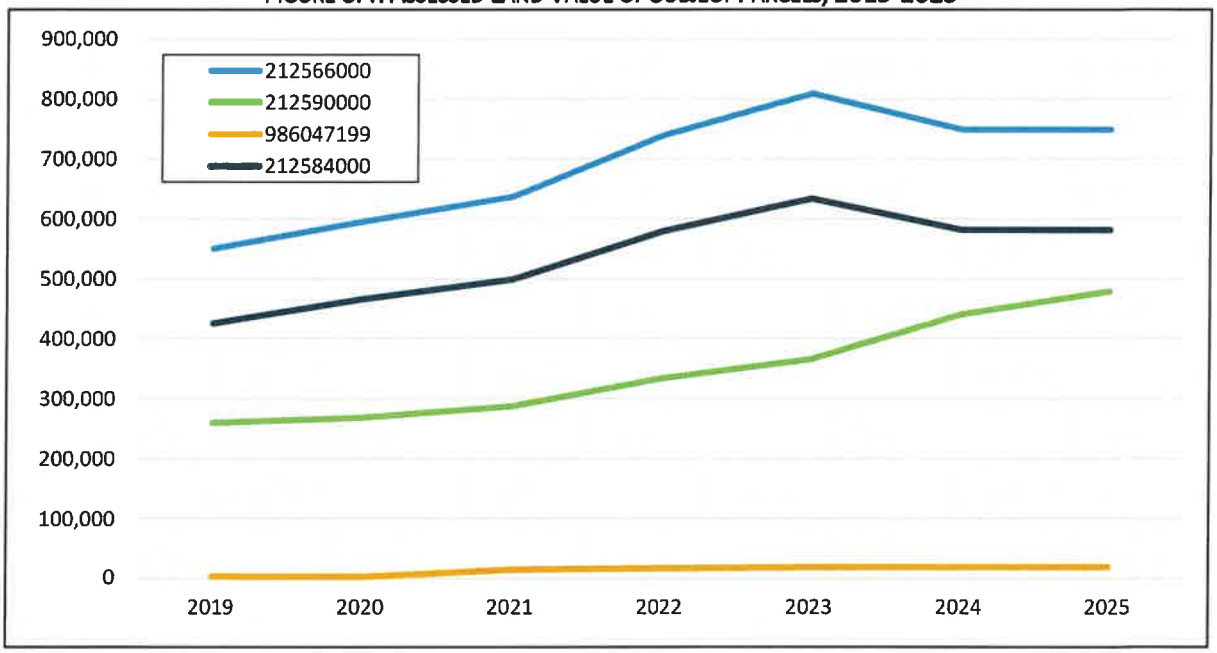
SOURCE: CoStar, City of Ridgefield, Google Earth, local media, JOHNSON ECONOMICS

LAND VALUES UNDER ALTERNATIVE USES

Under the Current Use program, the largest parcel, owned by Gerald and Beverly Jones, has a taxable value of $656,367, about half its assessed market value of $1.33 million. This includes the value of a home and several other buildings assessed at $580,470, which is most of that taxable value. The owners' other Current Use parcel has a taxable value of $113. The third parcel under Current Use, owned by Julie and David McPherson, has a taxable value of $600,901, compared to its assessed market value of $1.12 million. As with the other large parcel, this includes the value of a home and other buildings, which are assessed at $534,310. These taxable values would be maintained if the parcels continued their current agricultural use.

At fair market value, the land (excluding buildings) in the Current Use parcels is assessed at $749,049, $18,241, and $581,494 respectively; the first two are owned by Gerald and Beverly Jones and the last is owned by Julie and David McPherson. The other parcel owned by the Joneses, which is not under Current Use, is valued at $478,698. 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. 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 2019 to 2025, assessed land values increased by 36-85%.

FIGURE 6.4: ASSESSED LAND VALUE OF SUBJECT PARCELS, 2019-2025



SOURCE: Clark County Assessor, JOHNSON ECONOMICS

PROXIMITY OF MARKETS

The Jones property currently produces blackberries, though a variety of berries have been grown over the last 20-40 years. These were sold to Willamette Valley Fruit Company in Salem, Oregon, about 70 miles south. Prior to 2019, there were a few years in which clover, wheat, and fescue grass were grown, but the market proximity for these is not known. The McPherson property has not produced anything to be sold commercially since at least the mid-1990s.

CROP PRODUCTIVITY

The Jones farm currently produces blackberries. Blackberry productivity tables were discontinued by the USDA in 2018, so the following are rough estimates only. Average berry yield per acre in 2017 was about 6,400 pounds, and the average grower price is 77 cents per pound. According to Brett Jones, 6,400 pounds per acre is about the maximum yield at the subject property, in the areas with the highest quality soils. Seventeen acres of berries at this yield and price would result in maximum revenue of about $83,800. This figure only includes sales and does not take into account any costs.

While yield and price estimates have remained about the same since 2017, the costs of growing blackberries have increased substantially, as stated by Brett Jones. These increased costs include inflation on labor cost and labor insurance, farm insurance, fuel, chemicals, equipment maintenance cost, and depreciation, all dependent on farm and weather conditions as well as market supply and demand, according to Gerald Jones. Labor costs are particularly high for berries compared to hay (detailed below) as the plants need quite a bit of maintenance and the berries require

more careful handling. The small scale of this farming operation implies high per-unit equipment and transaction costs.

We consider hay to be another possible option for farming at the subject property, including the parcel owned by the McPhersons. 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, closer to 3 tons per acre. The USDA Washington-Oregon Hay Reports for July and August 2025 estimate sale prices of $175-250 per ton for good to premium quality hays. From these we estimate maximum hay crop revenue to be $525-750 per acre. If we assume exclusive hay production, selling all that is produced, and that there are about 47 acres usable for farming (excluding areas with existing buildings), maximum revenue is $24,700 to $35,300 yearly. The costs of growing hay include labor, equipment, and fertilizer as well as transaction costs, though these costs are lower than they are for blackberry production.

The most significant cost associated with farming the subject property, however, is the cost of buying or renting the land. The assessed market value of the subject property is almost $3 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.

Prior to 2018, the portion of the subject property owned by the Jones family was one of many properties farmed commercially by one farmer. Since then, Gerald Jones, the current owner of the subject property, has rented the 17 acres of berry crop to Brett Jones. Brett Jones disclosed to us that the berry crop has not been profitable. At best, he has made 20% of the revenue in profit (about $17,000 from our estimates), though in many other years, he broke even or incurred a loss. Additionally, the berry picking equipment available at the subject property has deteriorated in recent years, according to Gerald Jones. With these current market conditions, there is no profit margin available to purchase new equipment for berries or for hay. Additionally, the portion of the subject property owned by the McPhersons has no farming equipment or irrigation available. Alone, the area designated for agricultural use is small and not viable for commercial farming. 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

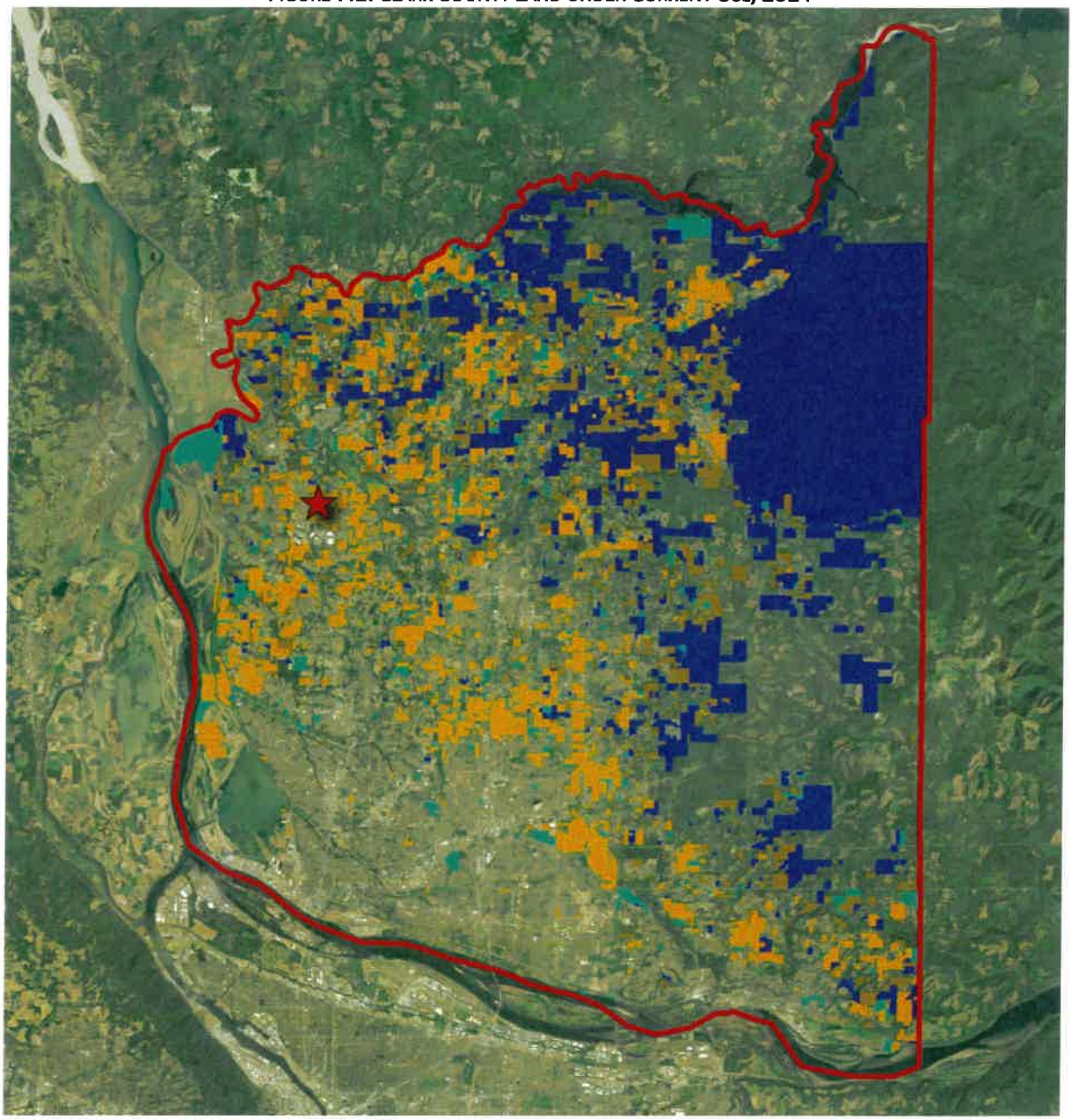
The Washington GMA specifies that a countywide analysis must be conducted in order for cities and counties to de-designate natural resource lands (including agricultural lands) within the county. This Comprehensive Plan is required by the Washington GMA to be updated by the end of 2025, after its last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

FIGURE 7.1: CLARK COUNTY LAND UNDER CURRENT USE, 2024

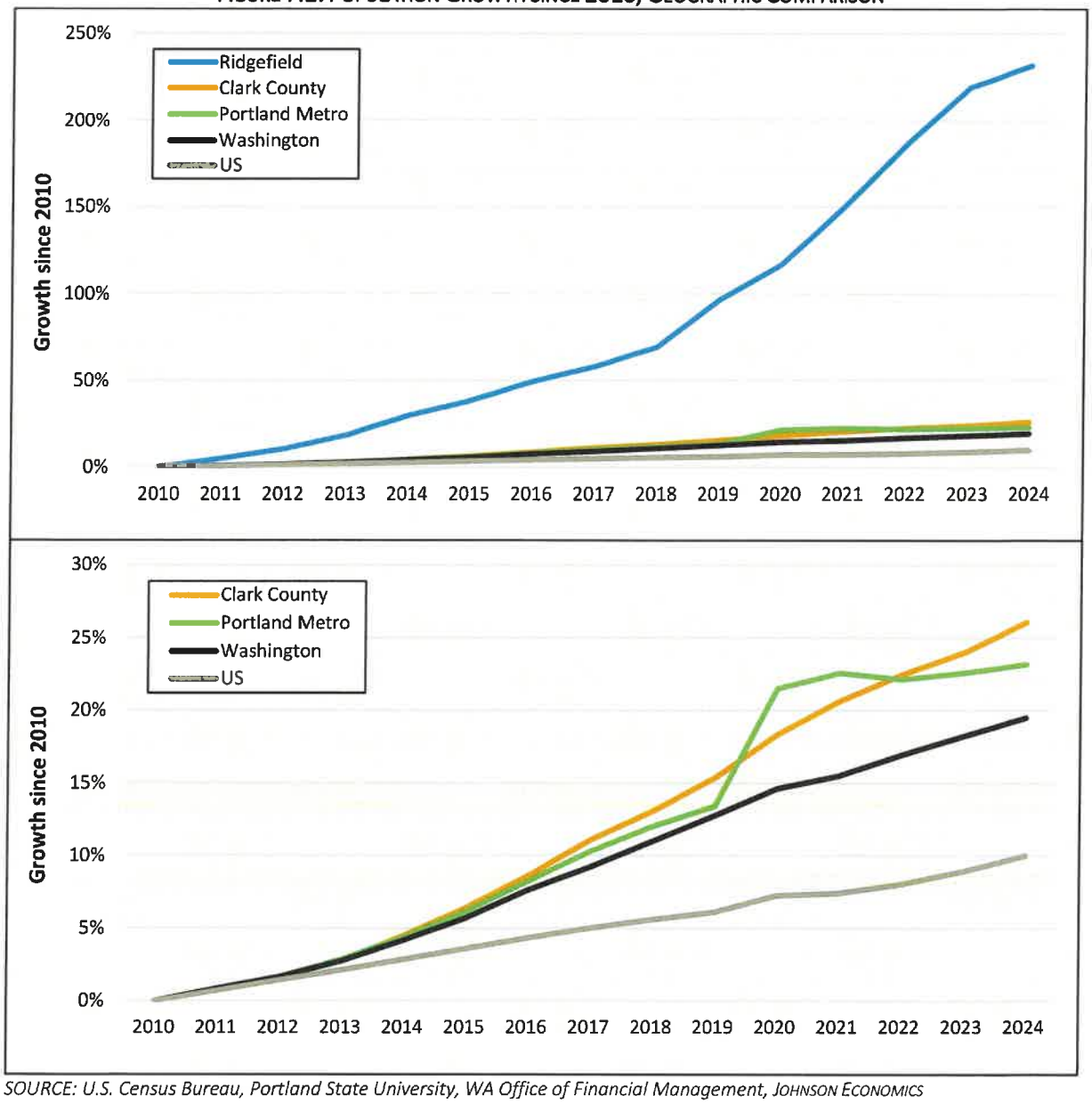


SOURCE: Clark County, JOHNSON ECONOMICS

POPULATION & DEVELOPMENT TRENDS

The county has seen population growth of 26% since 2010, which is equivalent to just over 110,000 people. Over that same period, Ridgefield saw a 232% increase in population, or just over 11,000 people. This is exceptionally fast compared to larger geographies, illustrated in the graphs below.

FIGURE 7.2: POPULATION GROWTH SINCE 2010, GEOGRAPHIC COMPARISON

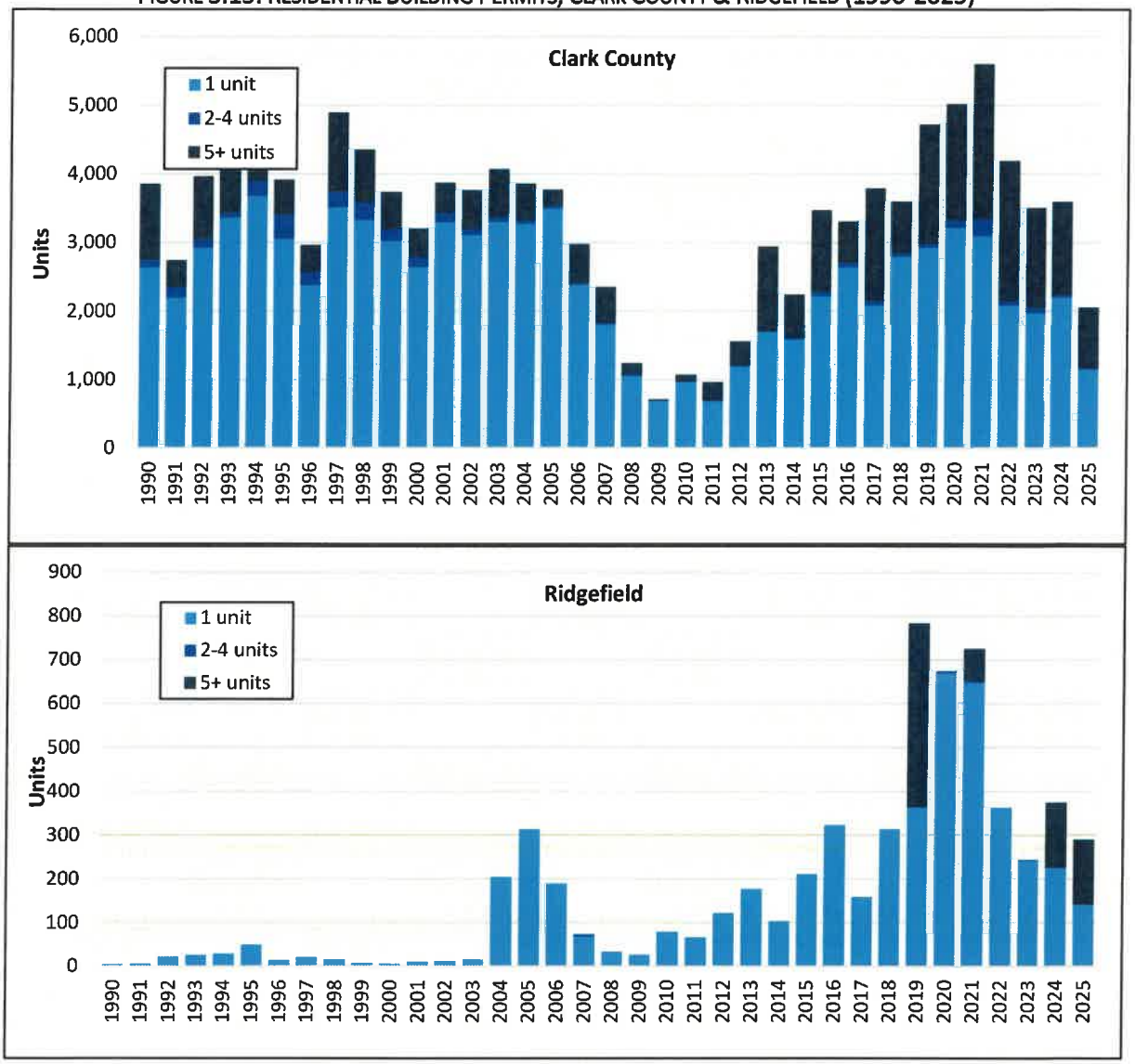


SOURCE: U.S. Census Bureau, Portland State University, WA Office of Financial Management, JOHNSON ECONOMICS

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 (1990-2025)



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

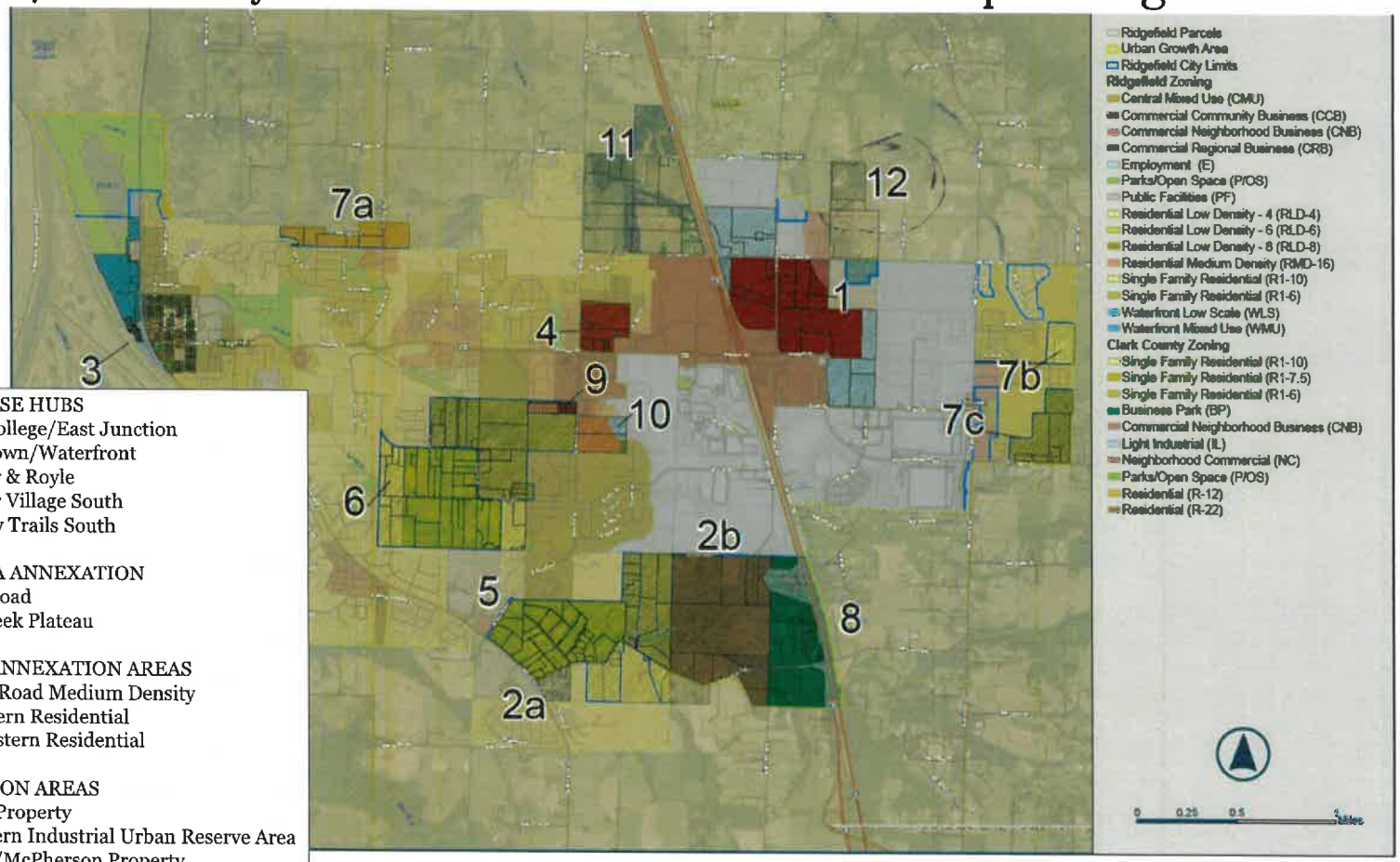
Based on our findings, it is our opinion that the subject property does not meet the criteria of agricultural land as laid out in the Washington Growth Management Act. It is therefore recommended for de-designation:

- 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 the Jones property is currently 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 about 35% of the land area designated for agriculture is used for growing crops at this property. The McPherson property is not being farmed at all; the family owns horses for personal use only. Several agricultural parcels around the subject site have also slowed or ceased farming altogether in recent years.

- The property no longer has "long-term commercial significance for agriculture," which is the third requirement in the GMA. The market value of this land for residential or commercial use is far higher than its assessed value for agricultural use. The values of these parcels reflect residential development values and are much higher than what a farmer would reasonably pay to use the land for farming. Additionally, the current berry crop does not turn a profit due to high equipment and labor costs for a relatively small farm area. Continuing farming at the subject property would require new investments in equipment, which would not be financially feasible.

3/20/2025 City Council Preferred Land Use Map – Targeted Growth



MIXED USE HUBS
1. Clark College/East Junction
3. Downtown/Waterfront
4. Pioneer & Royle
9. Pioneer Village South
10. Legacy Trails South

SUBAREA ANNEXATION
5. Carty Road
6. Gee Creek Plateau

OTHER ANNEXATION AREAS
2b. Carty Road Medium Density
7a. Northern Residential
7b/7c. Eastern Residential

EXPANSION AREAS
2a. Maul Property
11. Northern Industrial Urban Reserve Area
12. Jones/McPherson Property