



**RIDGEFIELD PLANNING COMMISSION
MEETING AGENDA**

**Wednesday, February 4, 2026
RACC - Columbia Assembly Room
510 Pioneer Street, Ridgefield, WA 98642**

I. GENERAL SESSION CALL TO ORDER - 6:30 PM

- 1. Flag Salute**
- 2. Roll Call**
- 3. Late changes to the agenda**

II. PUBLIC COMMENT

Anyone requesting to speak to the Commission regarding all items not subject to a specific Public Hearing may come forward at this time. Please state your name and limit comments to three minutes. Written comments may be submitted to the Clerk prior to the meeting.

III. CONSENT AGENDA

- 1. Approval of Minutes from the 01/07/2026 Meeting**

IV. BUSINESS

- 1. Presentation and Request for Recommendation: Rental Assistance Program - Claire Lust, Community Development Director, Kirk Johnson, Finance Director**

V. PUBLIC COMMENT

Anyone requesting to speak to the Commission regarding all items not subject to a specific Public Hearing may come forward at this time. Please state your name and limit comments to three minutes. Written comments may be submitted to the Clerk prior to the meeting.

VI. STAFF REPORTS

- 1. Critical Areas Ordinance Update - Stakeholder Interview Summary and Next Steps - Claire Lust, Community Development Director**

VII. FROM THE COMMISSION

VIII. ADJOURN

**CITY OF RIDGEFIELD
REQUEST FOR COMMISSION ACTION**

MEETING DATE: February 4, 2026

AGENDA ITEM NAME: Approval of Minutes from the 01/07/2026 Meeting

SUMMARY/BACKGROUND:

STAFF CONTACT:

ATTACHMENTS:

1. 01.07.2026 Minutes



**CITY OF RIDGEFIELD, WASHINGTON
PLANNING COMMISSION MEETING MINUTES
JANUARY 7, 2026**

Regular Meeting - 6:30 PM

I. GENERAL SESSION CALL TO ORDER - 6:30 PM

1. Flag Salute

2. Roll Call

Present:

Chair Mark Tyler
Commission Member Niall Glavin
Commission Member Jeffrey Borchardt
Commission Member Steven Moylan
Commission Member Justin Raczak
Commission Member Heather Gordon

3. Oath of Office: Steven Moylan

Clerk, Trina Siebert performed the Oath of Office with Steven Moylan.

4. Oath of Office: Justin Raczak

Clerk, Trina Siebert, performed the Oath of Office with Justin Raczak.

5. Oath of Office: Heather Gordon

Clerk, Trina Siebert, performed the Oath of Office with Heather Gordon.

6. Selection of chair

Commissioner Patrick Flynn nominated Commissioner Mark Tyler as Chair. Seconded by Commissioner Borchardt. Commissioner Tyler accepted the nomination. No other nominations were presented.

Commissioner Gordon moved to nominate Mark Tyler as Chair. Seconded by Commissioner Flynn. Ayes all. Motion passed unanimously.

7. Selection of vice chair

Commissioner Borchardt nominated Commissioner Flynn as Vice Chair. Commissioner Flynn accepted the nomination. No other nominations were presented. Commissioner Glavin moved to nominate Commissioner Flynn as Vice Chair. Seconded by Commissioner Borchardt. Ayes all. Motion passed unanimously.

8. Late changes to the agenda

No late changes to the Agenda.

II. PUBLIC COMMENT

Anyone requesting to speak to the Commission regarding all items not subject to a specific Public Hearing may come forward at this time. Please state your name and limit comments to three minutes. Written comments may be submitted to the Clerk prior to the meeting.

No public comments provided.

III. CONSENT AGENDA

1. Approval of Minutes from the 12/03/2025 Meeting

Commissioner Flynn moved to accept the minutes as presented. Seconded by Commissioner Borchardt. Ayes all. Motion passed unanimously.

IV. BUSINESS

1. Presentation: (Re)orientation to Planning Commission Roles and Responsibilities - Claire Lust, Community Development Director

Claire Lust, Community Development Director, presented (Re)orientation to Planning Commission Roles and Responsibilities.

2. Presentation and Recommendation: 2026 Planning Commission Work Plan - Claire Lust, Community Development Director

Claire Lust, Community Development Director, presented the 2026 Planning Commission Work Plan.

Discussion occurred regarding the Planning Commission table at the State of the City and the Ridgefield Junction Neighborhood Association.

Discussion occurred regarding whether there is a downtown business association.

Discussion occurred regarding why the Comprehensive Plan update has been delayed for six months.

Discussion occurred regarding what public hearings look like.

Discussion occurred regarding whether other code sections, besides Title 18, will be updated with the Comprehensive Plan.

Discussion occurred regarding training opportunities.

Commissioner Borchardt moved to recommend approval of the 2026 Planning Commission Work Plan amended to include the downtown subarea plan update. Seconded by Commissioner Flynn. Ayes all. Motion passed unanimously.

RESULT:	(UNANIMOUS)
MOVER:	Commissioner Borchardt
SECONDER:	Vice Chair Flynn
AYES:	Vice Chair Flynn, Chair Tyler, Commission Member Glavin, Commission Member Borchardt, Commission Member Moylan, Commission Member Raczak, Commission Member Gordon

V. PUBLIC COMMENT

Anyone requesting to speak to the Commission regarding all items not subject to a specific Public Hearing may come forward at this time. Please state your name and limit comments to three minutes. Written comments may be submitted to the Clerk prior to the meeting.

No public comment provided.

VI. STAFF REPORTS

Claire Lust, Community Development Director, wished everyone a Happy New Year. She is looking forward to working together this year. City Council adopted the residential code updates in December. Additional code updates should be adopted in February 2026.

VII. FROM THE COMMISSION

Commissioner Glavin wished everyone a Happy New Year and welcomed the new commission members.

Vice Chair Flynn congratulated Chair Tyler on his re-election. He likes the new roundabout art. He attended the tree lighting. He congratulated the new commission members. He thanked the members of the public that attended.

Commissioner Borchardt wished everyone a Happy New Year and welcomed the new commission members.

Commissioner Gordon is happy to be on the Planning Commission. She is looking forward to the work and getting to know everyone. She wished everyone a Happy New Year.

Commissioner Raczak is happy to be on the Planning Commission.

Commissioner Moylan is excited to be on the Planning Commission and is looking forward to advancing the Comprehensive Plan forward.

Chair Tyler welcomed the new commission members and is looking forward to working with everyone. He thanked the City staff and the members of the public that attended.

VIII. ADJOURN

Trina Siebert, Planning Commission Clerk

Mark Tyler, Chair

**CITY OF RIDGEFIELD
REQUEST FOR COMMISSION ACTION**

MEETING DATE: February 4, 2026

AGENDA ITEM NAME: Presentation and Request for Recommendation: Rental Assistance Program

SUMMARY/BACKGROUND:

In 2019, the Washington State Legislature adopted SHB 1406, which provides funding for affordable housing through a dedicated sales and use tax credit. In 2020, Ridgefield City Council approved collection of a sales and use tax under SHB 1406. The sales and use tax is credited against the state portion of sales tax on goods and services in Ridgefield. The amount the City receives is capped at approximately \$24,500 annually; as of year-end 2025, the City has accumulated a fund balance of \$138,481.

In May 2025, as the fund balance reached a point where it was appropriate and feasible to discuss how to use the funds, Council directed staff to begin researching rental assistance. Finance and Community Development staff had conversations with the Vancouver Housing Authority, Share House, and municipalities in Washington providing rental assistance under SHB 1406 to learn more about structuring rental assistance programs. Staff then coordinated with two local organizations (Family Resource Center and Compassion 360) to refine potential program parameters and define their roles as partners able to connect residents in need of rental assistance with the City program.

As a result of this outreach, staff is proposing the following parameters. We seek feedback from Planning Commission and a recommendation to Council regarding these parameters:

- Maximum rental assistance amount: \$1,000
- Maximum awards per household: 1 per 12-month period, 2 per lifetime

The statute also requires rental assistance to be directed to households at or below 60% Area Median Income and requires the sum to be paid directly to the landlord.

The presentation slides are included as an attachment.

STAFF CONTACT: Claire Lust, Community Development Director, Kirk Johnson, Finance Director

ATTACHMENTS:

1. Rental Assistance_PC



Rental Assistance Program SHB 1406 Funding Option

February 4, 2026
Planning Commission



SHB 1406 Background

SHB 1406	Description
Adopted by the Legislature in 2019	Provides funding through a dedicated sales and use tax credit for affordable housing. The sales and use tax is credited against the state portion of sales tax on goods and services in a jurisdiction.
Provides funding for affordable housing programs. Eligible uses for the funding:	<ul style="list-style-type: none"> • Acquiring, rehabilitating, or constructing affordable housing. May include new units within an existing structure or facilities providing supportive housing services under RCW 71.24.385 (behavioral health orgs) • Operations and maintenance costs of new units of affordable or supportive housing. • Cities under 100,000 population may use for rental assistance for tenants at or under 60% AMI.
Available revenue for the program over the 20-year timeline 2020 – 2039	The maximum amount received is based on FY 2019 taxable retail sales.



SHB 1406 Background

Ordinance No. 1319	Description
Adopted by the City Council in July 2020	Provides funding through a dedicated sales and use tax credit for affordable housing. The sales and use tax is credited against the state portion of sales tax on goods and services in Ridgefield.
Provides funding for affordable housing programs. Options for city programs at the time the Ordinance was adopted:	<ul style="list-style-type: none"> • Administer a city led grant program for acquisition, construction or rehabilitation or affordable or supportive housing facilities and for the operations and maintenance of these facilities. • Pass the funds through to a non-profit such as Vancouver Housing Authority. • Enter into an interlocal agreement with Clark County and Vancouver to form a shared grant program in Clark County.
Available revenue for the program over the 20-year timeline 2020 – 2039	The amount the city will receive will cap at approximately \$24,500 annually.



SHB 1406 Background

Council Guidance/Statutory Requirements	Description
Council provided guidance in May 2025 to begin researching a rental assistance program	Staff have had conversations with the Vancouver Housing Authority, Share House and municipalities in Washington to research rental assistance programs.
Available funding	<ul style="list-style-type: none"> • As of Year-end 2025: A fund balance of \$138,481. • Annual receipts \$24,500.
Statutory program parameters	<ul style="list-style-type: none"> • At or below 60% AMI (Area Median Income). • Assistance must be paid directly to the landlord.



SHB 1406 Background

Program Parameters	Description
Parameters identified in discussion with local non-profits and municipalities providing rental assistance programs.	<ul style="list-style-type: none">• Have a cap on the dollar amount of assistance.• Have a cap on the number of times assistance may be provided.• Provide detailed requirements for assistance award to partner non-profits (required documentation for eligibility).

Program Parameters	Description
Program examples identified with local non-profits (Family Resource Center and Compassion 360).	<ul style="list-style-type: none">• Award amount. What is the appropriate maximum award?• How many awards in a 12-month period?• How many awards in a lifetime.• Assistance agreement for both the grantee and the landlord to sign.• Payment directly to the landlord.



Planning Commission Recommendations

- Request a recommendation on the parameters of the assistance program
 - Maximum assistance amount
 - Timeline for available assistance
 - Number of assistance grants over a lifetime





THANK YOU



Ridgefield Critical Area Code Update

Ridgefield Planning Commission – February 4, 2026

STAKEHOLDER INTERVIEWS

In December 2025, the consulting team conducted telephone and video conference interviews with key agency personnel familiar with the management of critical areas under the Growth Management Act (GMA). The Stakeholder interview process is on-going. Below is a recap of the comments the Stakeholders provided after reviewing the city's current Critical area regulations in RDC 18.280. The complete notes from each interview and follow-up comments Stakeholders provided are included in the Appendix.

SYNOPSIS OF STAKEHOLDER INTERVIEWS - THEMATIC COMMENTS

General Comments.

- Definitions. Add a section identifying and defining each of the five (5) critical areas.
- 18.280.010, Purpose. The city does not have critical area jurisdiction on lands outside the UGA prior to annexation.
- 18.280.020.B, Relationship to other regulations. Be clear that when the Shoreline Master Program (SMP) and critical areas intersect, the SMP controls.
- 18.280.020.D, Regulatory flexibility. DOH suggests that the city remove the exemption for property in in buffers used for domestic uses. (This has been an issue recently with development projects.)
- 18.280.030, Applicability. Amend subsection A.4 to clarify that when two or more critical areas intersect on a property more than one critical area set of regulations may apply, not just the most restrictive.
- Professional qualifications: Be consistent regarding how we label qualifications for producing critical area reports and ensure that qualified professionals are licensed in the state of Washington.
- Sequencing: Avoidance is preferred and the applicant must demonstrate each step taken regarding the avoidance/mitigation sequence.
- Mitigation: Off-site mitigation is permissible but the city is not precluded from requiring a portion of necessary mitigation to be on-site or within the UGA.

Fish and Wildlife Habitat Areas, RDC 18.280.110

- Stream Buffers. WDFW believes that a 50-foot buffer for a Type Np/Ns stream with low mass wasting is not supported by BAS. Amend table 18.280.110-1 to increase the minimum riparian buffer for a Type Np/Ns stream with low mass wasting to 100 feet. Buffer averaging or reduction cannot allow a buffer as small as 50 feet.
- Mitigation. An applicant must clearly demonstrate that avoidance is not possible before proposing other strategies such as mitigation.
- Functional Isolation. Require an applicant to consult with WDFW staff about claims of 'functional isolation.'

- Stream versus ditch versus underground stream. WDFW is revising the current language that defines stream, ditch, and underground stream, which the city may follow.
- Site Specific Tree Height at 200 feet (SPTH₂₀₀). WDFW will support 100-foot and wider buffers that are less than the SPTH₂₀₀ guidance especially if the city adopts language that imposes the 100, 120 and 150 foot buffers plus enhancement based on SPTH₂₀₀.
- Oregon white oak trees. WDFW will support protection of individual Oregon white oak trees and will offer mitigation guidance.

Flood Management Areas, RDC 18.280.120

No specific comments. The Section is based on federal regulations.

Geology and Landslide Hazards, RDC 18.280.130

- Consider adding language about protecting slopes that are ‘post-wildfire’ debris slopes.
- Reference the [WDNR Geologic Information Portal](#).
- There is not a ‘one size’ geologic base-line buffer. However, base-line buffers are not discouraged. Site specific studies are an important tool for establishing buffers for geologic hazards. The city could establish a base-line geologic buffer but allow the standard to be altered as a result of a site specific professional study.
- Consider strengthening protections for Critical Facilities such as medical, emergency, and utilities that are sited in landslide hazard areas or steep slopes.

Critical Aquifer Recharge Areas, RDC 18.280.140

- Consider designating the entire UGA as a CARA-I Sole Source Aquifer (SSA) because it is. If the entire UGA is a CARA 1, the city could waive the level one hydrogeological assessment **IF** wellhead protection areas are not impacted by the development.
- Consider designating wellhead protection areas as CARA -II. Citation is out of date, see WAC 365-190-030(23).
- Medical waste is managed within its own waste stream regulations and usually does not impact CARAs. DOH suggests clarifying language adding such as, *“Storage, processing, or disposal of radioactive substances is prohibited in CARAs, except for medical equipment or materials that are used within a medical facility, and medical waste as defined in RCW 70.99.020 that is generated within a medical facility and held for proper disposal.”*
- The following do not apply to drinking water: No Net Loss, Mitigation for impacts, Exemptions for Minor Impacts or for public entity or utility impacts, Critical Area signs and markers.
- 18.280.F.1.c.ii, Underground storage tanks. Does the city use dry wells for storing stormwater runoff?
- 18.280.170, Definitions. “Critical aquifer recharge area” means areas designated by WAC 365-190-080(2). The WAC does not designate critical areas; the local jurisdiction does.
- On a broader question, why does chapter 18.280 have a discrete definition section?

Wetlands, RDC 18.280.150

- Table 18.280.150-4: Category 2 buffers are currently smaller than Ecology recommendations. Example: High habitat function and high land use intensity currently requires a 200ft buffer. Ecology guidance recommends 300ft buffer.
- Mitigation. Mitigation ratio for Category I wetland should be 4:1

- Wetland banks. Ecology endorses off-site mitigation in approved wetland banks but would not object to the city requiring a percentage of the mitigation efforts to occur on-site or in the city.
- 18.280.150(iv): Buffer Width Reduction. Clarify that it is not possible to reduce a buffer twice on the same wetland. Buffer reductions cannot be less than 75%.
- 18.280.030(22): Exemptions for wetlands under 5,000 square feet, the City might consider clarifying that exempting these wetlands only means that they do not have to show avoidance and minimization.

QUESTIONS

The December memorandum posed several questions the Planning Commission may wish to discuss.

Avoidance – Mitigation.

The city of Ridgefield expressly adopts “No Net Loss” - Land development and uses within the city shall result in no net loss of functions and values of critical areas. The goal of “no net loss” is to maintain the status quo. “No net loss” is NOT a mechanism for enhancement.

RDC 18.280.060, establish a hierarchy of preferred strategies when proposed development might impact a critical area:

- (1) avoid impacts,
- (2) minimize impacts, and
- (3) compensatory mitigation.

The strategy must result in no net loss of functions and values. BAS guidance now emphasizes focusing on avoidance first.

Questions:

- (1) The state regulatory agencies now strongly advocate for avoidance over minimization and compensation. Ridgefield sometimes accepts compensatory mitigation over avoidance to help facilitate needed housing or commercial development that is consistent with the Comprehensive Plan. What does the Planning Commission believe is the appropriate balance between avoidance and compensation?
- (2) The city has approved off site mitigation for development impacts to wetlands and riparian areas. Does the Planning Commission believe the use of established off-site wetland and riparian banks is preferable to onsite mitigation and/or enhancement?

Anadromous fish

The GMA requires that critical area regulations must demonstrate that they ‘give special consideration to conservation or protection measures necessary to preserve or enhance anadromous fisheries.’ ([RCW 36.70A.172\(1\)](#)) "Anadromous waters" are all waters that are not landlocked. (WAC 220-300-020) Anadromous fish hatch in freshwater, go to the ocean as juveniles, grow there to adulthood and return to the place of their birth. In Ridgefield streams that might support anadromous fish include Lake River, Gee Creek, Allen Creek, and other minor tributaries.

Questions:

- (1) What special conservation or protection measures does the Planning Commission recommend to provide “special consideration” to anadromous fisheries?

(2) Should the city of Ridgefield develop a local salmon recovery plan?

Fish and wildlife habitat conservation areas

The Washington Department of Fish and Wildlife (WDFW) issued revised management recommendations for Riparian Priority Habitat in 2020. Key among the management recommendations in Volume 2 is the use of the 200-year Site Potential Tree Height (SPTH₂₀₀) as the basis for designation of riparian habitat as defined in WDFW's Priority Habitat and Species List (2008).

Some jurisdictions in the Puget Sound region did not adopt SPTH₍₂₀₀₎. During the Stakeholder interview with WDFW staff, the group discussed a hybrid approach to SPTH₍₂₀₀₎ : (a) Adopt the SPTH₍₂₀₀₎ standard but (b) allow for a reduction in the buffer IF the developer enhances and monitors allowing for reduction of the buffer width if the development establishes and monitors Site potential the buffer to ensure that there is no net loss of SPTH₍₂₀₀₎ critical area function and value.

Question:

(1) Does the Planning Commission endorse such a hybrid approach?

Critical Aquifer Recharge Areas (CARA)

During the Stakeholder interview with the Department of Health (DOH) , DOH staff suggested that because the Ridgefield UGA is a Sole Source Aquifer (SSA), the city could simplify administration of the CARA-1 section of the code by:

- (a) identifying the uses allowed in CARA-1 that do not require a Geo-Hydrological Analysis, and
- (b) designating wellhead protection areas CARA-2 and regulating the types of uses allowed in CARA-2 and the type of Geo-hydrological analysis that is required.

There are two types of CARAs, Category-1 and Category-2. The entire city is in the CARA-1 zone. CAR-2 zones include wellhead protection areas which are source areas for potable water.

Question:

- (1) Should the city prepare draft amendments to section 18.280.140 that revise the CARA-1 and CARA-2 regiment?

APPENDIX – Stakeholder Interview Notes

Stakeholder interview comments and follow-up comments.

I. Brent Davis, Manager of Wetland and Habitat Review

Clark County Community Development Department
564.397.5855, WetlandHabitatReview@clark.wa.gov
December 17, 2025

RDC 18.280, Critical areas, Generally

Clark County adopted amendments to Critical Areas elements of Title 40 in the fall of 2024. Mr. Davis did not offer specific observations about the Ridgefield Critical Area code, RDC 18.280, but offered the following observations:

- He is not aware of any local city that has adopted Clark County’s critical area regulations by reference.
- The County adopted the WDFW’s STHP₂₀₀ guidance about riparian buffers. However, the County allows buffer reduction if the reduction is associated with buffer enhancement. Buffer averaging is not allowed. Mr. Davis said that WDFW accepted the County’s position.
- The County follows the wetland mitigation sequencing and encourages Avoidance first but does allow compensatory mitigation.
- The County follows WA Ecology guidance regarding Indirect Impacts.
- Regarding off-site mitigation versus on-site mitigation, the County supports the purchase of wetland and habitat bank credits but looks at each case individually and tries to select the options that have an ecologically superior solution.
- The County merged the separate Wetland and Habitat chapters into one Chapter 40 Title to improve internal ordinance consistency.

II. Brittany Salter, Planning Lead

SW WA Department of Natural Resources
December 29, 2025

RDC 18.180.110, Fish and Wildlife Habitat conservation areas.

- Stream Buffers. The Ridgefield buffers are “not the worst” she has reviewed. However, WDFW believes that a 50-foot buffer for a Type Np/Ns stream with low mass wasting is not supported by BAS. Ridgefield amend table 18.280.110-1 to increase the minimum riparian buffer for a Type Np/Ns stream with low mass wasting to 100 feet. Buffer averaging or reduction cannot allow a buffer as small as 50 feet.
- Mitigation. WDFW requires a development to demonstrate sequencing, i.e., an applicant must clearly demonstrate that avoidance is not possible before proposing other strategies such as mitigation. WDFW recommends that the city and the mitigation sequencing standards to RDC 18.280.110.
- Functional Isolation. WDFW asks that the city requires an applicant to consult with WDFW staff about claims of ‘functional isolation.’ (Ridgefield could make this a standard requirement in the pre-application conference notes.) The WDFW team will conduct a site visit to verify the claim of functional isolation.

- Stream versus ditch versus underground stream. The current language defining stream, ditch, and underground stream, is based on language provided by the WA Dept. of Commerce. WDFW is revising the definitions and has prepared a draft statement which they will send to the city for review and consideration.
- Bats. The WDFW Priority Habitat Species (PHS) mapping tool provides very general polygons regarding the possible location of non-riparian species such as bats. If a consultant has questions about the precise location of such a species, WDFW has site specific sighting maps which are available on a case-by-case basis.
- Site Specific Tree Height at 200 feet (SPTH₂₀₀). Several jurisdictions in the Puget Sound region are not adopting the SPTH₂₀₀ guidance. Clark County has done so. WDFW does not support any riparian buffer less than 100 feet from the Ordinary High Water Mark (OHWM). However, WDFW does support the larger buffers in table 18.280.110-1. WDFW will support 100-foot and wider buffers that are less than the SPTH₂₀₀ guidance especially if the city adopts language that imposes the 100, 120 and 150 foot buffers plus enhancement based on SPTH₂₀₀.
- Oregon white oak trees. Ridgefield has single Oregon white oak trees or small clusters of whit oaks but does not have clusters as large as one acre or more. WDFW will support protection of individual Oregon white oak trees and will offer mitigation guidance. However, WDFW does not suggest specific ratios for mitigation because of site specific factors such as size of parcel, maturity of the trees, and more.
- WDFW will send the city additional guidance materials after the New Year.

III. Tricia Sears, Geologic Planning Liaison

WA Department of Natural Resource, Washington Geological Survey (WGS)
360.628.2867, tricia.sears@dnr.wa.gov
December 23, 2025

RDC 18.280.130, Geologic hazards.

Ms. Sears provided the following materials prior to and after the video conference:

- [Quick Reference — Preparing for Landslide Hazards: A Land Use Guide for Oregon Communities](#)
- [Preparing for Landslide Hazards: A Land Use Guide for Oregon Communities](#)
- Qualified professional definitions and other code provisions include Bellevue, Kirkland, Burien, and Issaquah.
- Comments on RDC 18.280 in track changes.

The consultants posed several questions to Ms. Sears:

1. *Is there a BAS threshold for Landscape hazards based on slope? Some jurisdictions use a threshold of 15%, or 25%, or 40%.*

RESPONSE: Landslides are not classified based on slope alone. Slides older than 150 years are classified as ‘pre-historic’. She recommended that we review the DNR “Quick Reference“ publication above and the “Natural Hazards Mitigation Plan” publication She suggested we should consider language relating to post-wildfire debris flows as part of our critical area or climate resiliency planning efforts.

2. *The city code relies on a 1975 study as well as Clark County MapsOnline for guidance on landslide mapping. Are there more current mapping tools the city should use?*

RESPONSE: The 1975 study is still valid. Add reference to MapsOnline to the code. Also, reference the [WDNR Geologic Information Portal](#).

3. *RDC 18.280.130 references special considerations for “Critical Facilities.” Should RDC 18.280 and 18.280.130 be more robust regarding Critical Facilities?*

RESPONSE: Yes, consider how some of the communities mentioned above have addressed Critical Facilities in Landslide Hazard areas.

4. *The city and state agencies require buffer areas for wetlands and riparian areas. Some jurisdictions establish buffers for geologic hazards that range from 15 feet, 25 feet and 40 feet. Is there a BAS-based standard for buffers for geologic hazards?*

RESPONSE: There is not a ‘one size’ geologic base-line buffer. However, base-line buffers are not discouraged. Site specific studies, prepared by qualified professionals, licensed in Washington, are an important tool for establishing buffers for geologic hazards. The city could establish a base-line geologic buffer but allow the standard to be altered as a result of a site specific professional study.

5. *Mitigation. RDC 18.280 establishes mitigation standards for wetlands and habitat areas. Is there a BAS standard we should consider for mitigation and monitoring impacts to geologic hazards?*

RESPONSE: Consider the Bellview, Black Diamond and other codes referenced in her reply email to us.

Other comments:

- Add an Applicability Section defining each regulated critical area.
- Be consistent regarding how we label qualifications for producing geologic reports. Define “qualified professional” and require that they be licensed in the State of Washington.
- Ms. Sears is willing to review the city’s amendments to RDC 18.280.

IV. Deborah Johnson, Wellhead Protection Program Coordinator

Office of Drinking Water, Environmental Public Health Division
WA Department of Health
December 29, 2025

RDC 18.280.140, Critical aquifer recharge areas (CARAs).

Ms. Johnson sent the city’s consulting team a detailed review of RDC 18.280 in Track changes format. The entire Ridgefield UGA is categorized as a CARA 1. The interview reviewed in detail each edit and comment Ms. Johnson provided. The highlights of the comments and conversation follow.

General comments:

- 18.280.010, Purpose. The city does not have critical area jurisdiction on lands outside the UGA prior to annexation. Review section A.
- 18.280.020.A, General provisions. The “no net loss” GMA requirement does not fit neatly with drinking water concerns – one cannot mitigate contamination similar to mitigating an impact to a wetland.
- 18.280.020.B, Relationship to other regulations. Be clear that when the Shoreline Master Program (SMP) and critical areas intersect, the SMP controls.

- 18.280.020.D, Regulatory flexibility. DOH suggests that the city remove the exemption for property in in buffers used for domestic uses. (This has been an issue recently with development projects.)
- 18.280.020.F, Warning and disclaimer of liability. Keep this language as is.
- 18.280.030, Applicability. Add language specifying the type of critical areas chapter 18 regulates. Amend subsection A.4 to clarify that when two or more critical areas intersect on a property more than one critical area set of regulations may apply, not just the most restrictive.
- 18.280.030.B.5, Exemptions. Tie the landscaping exemption to product labels on CARAs.
- 18.280.040.F, Approval, Critical area markers and signs. Signs and markers are not required or useful for CARAs (because the entire city of Ridgefield is categorized as a CARA 1).
- 18.280.040.I, building setbacks. A 5-foot building setback in a CARA is not applicable.
- 18.280.050.A, Submittal requirements. Clearly define “qualified professional.” Be sure to include ‘licensed in the state of Washington. Consider adding a section authorizing independent 3rd party review paid for by the applicant.
- 18.280.050, Mitigation Plan. Mitigation plans do not apply to CARAs.
- 18.280.060.C, Compensatory mitigation. The mitigation sequencing does not apply to CARAs – a city cannot allow impacts to public drinking water and mitigate such impacts.
- 18.280.060.D, No net loss. No net loss does not apply to CARAs.
- 18.280.080.B.6, Minor exemptions, Degradation. The city cannot permit a project to degrade drinking water.
- 18.280.090.A.2.f, Reasonable use, mitigation. The city cannot allow a reasonable use exemption to mitigate for adverse impacts to drinking water.
- 18.280.090.B.2.d, Public agency and utility exemptions. The city cannot allow a public agency or utility to mitigate for adverse impacts to drinking water.

18.2480.140, Critical aquifer recharge area (CARAs)

- 18.280.140.A, Designation. If the entire UGA is classified as a CARA 1, why not say so. The CARA 1 classification is based on the ground water coming from a single Sole Source Aquifer. In addition to a city-wide CARA 1 designation, the city could designate Well-head protection areas for CARA 2 protection.
- 18.280.140.A.1, Wellhead protection areas. The WAC 246-290-135. Citation is out of date, see WAC 365-190-030(23).
- 18.280.140.A.2, Sole source aquifers. Could designation the entire UGA as a Sole Source Aquifer (SSA). See, <https://experience.arcgis.com/experience/1bfab371d71e4b868fc9ae7df62a16fe>.
- 18.280.140.A.3, Susceptible groundwater management areas. Does the city have any? Note this differs somewhat from WAC 365-190-100(4)(b)(ii): “Areas established for special protection pursuant to a groundwater management program, chapters [90.44](#), [90.48](#), and [90.54](#) RCW, and chapters [173-100](#) and [173-200](#) WAC.”

- 18.280.140.B, Rating CARAs. The city does not rate aquifers. Do not use the old Ecology rating system. The city might eliminate this subsection.
- 18.280.140.C, Mapping CARAs. Identify where the city CARA maps are: MapsOnline, WA Dept, of Health Source Water Protection (SWAP) mapping tools.
- 18.280.140.E.1, Additional report requirements. DOH suggests that a ‘qualified professional’ as applied to CARAs, is “ *someone who is a currently licensed Washington State geologist holding a current specialty license in hydrogeology. A general practice geologist or PE, or one whose specialty lies in another area, may or may not have appropriate background to perform this work. (See Ch. 18.220 RCW & Ch. 308-15 WAC, generally, & specifically WAC 308-15-053 & -055.)*”
- 18.280.140.E.2.d, Hydrological assessment, Injection wells. “*Prohibiting injection wells other than OSS is likely to conflict with stormwater handling, as injection devices are typically used with ponds. Has the City adopted the WWA stormwater manual? You might need to work with PW to determine/address any conflicts.*”
- 18.280.140.E.3, Level one hydrogeological assessment, c and. The 1,300 foot standard for current data analysis is arbitrary and not supported in the RDC.
- 18.280.140.E, Level one hydrogeological assessment. General discussion. If the entire UGA is a CARA 1, the city could waive the level one hydrogeological assessment **IF** wellhead protection areas are not impacted by the development. It is up to each jurisdiction. Note that medical waste is managed within its own waste stream regulations and usually does not impact CARAs.
- 18.280.140.F, CARA performance standards. DOH suggests deleting the sentence “The proposed activity must comply with the water source protection requirements and recommendations of the U.S. Environmental Protection Agency, Washington State Department of Health, and the Clark County Health District.” DOH says, “*Source water protection is not a performance measure for land uses, it is a planning requirement applicable to public water purveyors. The SWP provisions of the federal Safe Drinking Water Act are embodied in [WAC 246-290-135](#); but this would apply only to the City in its role as a water purveyor, for managing its wells, sanitary control areas & developing/implementing a wellhead protection program. It does not, however, apply directly to land-use actions within the WHPA.*”
- 18.280.F.1.c.ii, Underground storage tanks. Does the city use dry wells for storing stormwater runoff?
- 18.280.140.G, Statutes and regulations table. Check to be sure citations are current particularly related to injection wells and septic systems.
- 18.280.140.H.23, Prohibited uses in CARAs, underground injection well classes. EPA’s classification system has changed, & these subclasses are no longer in use. Review which types of wells the City intends to prohibit & synchronize with earlier prohibition & stormwater issues in comments.
- 18.280.140.H.3.d, Mining. Storage and processing of radioactive waste is not mining. It should probably have its own category. It is problematic to prohibit across the board as it impacts medical/dental facilities, which are low-level generators (x-rays). DOH suggests language developed by City of Leavenworth: “*Storage, processing, or disposal of radioactive substances, except for medical equipment or materials that*

are used within a medical facility, and medical waste as defined in RCW 70.99.020 that is generated within a medical facility and held for proper disposal.”

- 18.280.170, Definitions. “Critical aquifer recharge area” means areas designated by WAC 365-190-080(2). The WAC does not designate critical areas; the local jurisdiction does. On a broader question, why does chapter 18.280 have a discrete definition section? See also 18.280.170 definitions for qualified professional and for wellhead protection area. Should **all** critical area definitions be included in Chapter 18.100, Definitions?

In a follow-up email dated January 8, 2026, Ms. Johnson provided the following suggestions regarding defining the entire UGA as a CARA I critical area based on its character as a Sole Source Aquifer (SSA).

Bainbridge Island – Bainbridge Island Aquifer System SSA

<https://www.codepublishing.com/WA/BainbridgeIsland/html/BainbridgeIsland16/BainbridgeIsland1620.html#16.20.100>

“In accordance with WAC 365-190-100, the entirety of Bainbridge Island is classified as an aquifer recharge area to preserve the volume of recharge available to the aquifer system and to protect groundwater from contamination.”

Oak Harbor – Bainbridge Island Aquifer System SSA

<https://www.codepublishing.com/WA/OakHarbor/#!/OakHarbor20/OakHarbor2032.html#20.32>

“The approximate location and extent of CARAs are shown on the city’s adopted critical areas maps. These maps are to be used as a reference for the city, project applicants and property owners and may be superseded by new data.” (but then the map shows the whole city- see <https://oakharbor.gov/DocumentCenter/View/473/Aquifer-Recharge-Areas-PDF>)

University Place – Central Pierce County Aquifer Area SSA

<https://www.codepublishing.com/WA/UniversityPlace/#!/UniversityPlace17/UniversityPlace1720.html#17.20>

“The entire City is located within an aquifer recharge area as defined by Clover/Chambers Creek Aquifer Basin Boundary, the 10-year wellhead protection areas as identified by TPCHD and the DRASTIC zones that are rated 180 and above.”

Spokane Valley – Spokane Valley-Rathdrum Prairie Aquifer Area SSA

<https://www.codepublishing.com/WA/SpokaneValley/#!/SpokaneValley21/SpokaneValley2140.html#21.40.00>

“Due to the geologic conditions within the SVRP aquifer, the entire City is identified as a high susceptibility CARA area.”

Ms. Johnson will provide formal comments during the 60-day comment period but is happy to discuss any issues with the city team prior to the comment period.

V. Washington Department of Ecology (ECY)

Emily Atkins, Critical areas ordinance (CAO) coordinator
Maria Sandercock, Section Manager, Shorelands & Environmental Assistance Program
Casey Vaughn, Wetland-Shoreline Specialist
December 31, 2025

Wetlands, RDC 18.280.150

Topics of Conversation: (To be amended pending additional information from Ecology staff.)

- Publications: Wetlands should be regulated based on the following Ecology publications:
[Wetland Guidance for Critical Area Ordinance Updates, October 2022](#),
[Wetlands in Washington State - Volume 2: Guidance for Protecting and Managing Wetlands](#)
- Habitat scores: Update city rating system based on 2018 recommendations
- Prior Converted Wetlands: Ecology to provide the team with recommendations
- Buffers. Casey Vaughn to send city team his markups relating to Category II wetland buffers, Buffer segments, Buffer reductions cannot be less than 75%.
- Mitigation: Mitigation ratio for Category I wetland should be 4:1
- Exemptions. Ecology recommends that the City amend the exemption language to reflect size and 'Other Factors' which they will send to us.
- Wetland banks. Ecology still approves off-site mitigation in approved wetland banks but would not object to the city requiring a percentage of the mitigation efforts to occur on-site in the city.

Additional review. Ecology offered to review our draft amendments prior to the mandatory 60-day comment period during which the comments must be more formal. Emily Atkins emailed that she will provide detailed comments by January 21, 2026.

On December 31, 2025, Casey Vaughn provided follow-up comments regarding the current Ridgefield CAO:

1. Table 18.280.150-4: Category 2 buffers are currently smaller than Ecology recommendations. Example: High habitat function and high land use intensity currently requires a 200ft buffer. Ecology guidance recommends 300ft buffer.
2. 18.280.150(iii): *“Buffer Width Averaging. The community development director or designee may allow buffer width averaging in accordance with an approved critical area report on a case-by-case basis. Buffer width averaging shall not be used in combination with buffer width reduction or a minor exception on the same buffer segment to reduce the minimum buffer width below that specified in this chapter. Averaging of buffer widths may only be allowed where a qualified professional wetland scientist demonstrates that: (A) Such averaging will not reduce wetland functions or functional performance; and (B) The wetland varies in sensitivity due to existing physical characteristics or the character of the buffer varies in slope, soils, or vegetation, and the wetland would benefit from a wider buffer in places and would not be adversely impacted by a narrower buffer in other places; and (C) The total area contained in the buffer area after averaging is no less than that which would be contained within the standard buffer; and (D) The buffer width is reduced by no more than fifty percent of the standard width and at no point to less than twenty-five feet.”*
 - a. I stated in the meeting that I did not see a reduction limit but I am now seeing that the buffer cannot be reduced more than 50% of the standard width or less than 25 feet. Ecology guidance recommends no less than 75% of the standard buffer width should be reduced.

18.280.150(iv): Buffer Width Reduction

- a. I would recommend having some type of standard with this parameter. Typically, I have seen CAO's have BMP's that can be done in order to reduce the land use intensity and therefore reduce the buffer. This one appears to be more of a blanket approval for any wetland buffer reduction though I am not sure I have seen this used. Emily may have additional guidance or examples from Ecology.
4. 18.280.15(iv)(D): *"Buffer width reduction shall not be used in combination with buffer width averaging on the same buffer segment but can be used in combination with the same wetland resource."*
 - a. I would recommend removing the term "buffer segment" and removing the last part of the statement that two buffer reductions can be used on the same wetland resource. Ecology recommends that double buffer reduction should not be allowed and this is a way to reduce a buffer twice on the same wetland through combination.
5. Table 18.280.150-7: Mitigation Ratios
 - a. Category 1 wetland, based on scores or functions, mitigation ratios for reestablishment or creation are 3:1. Ecology's current guidance recommends 4:1.
6. 18.280.030(22): Exemptions for wetlands under 5,000 square feet (see image below for exact text).
 - a. I commented in the meeting that since Ridgefield does have many of these small, category 3 or 4 wetlands in old agricultural fields that the City may want to consider changing this exemption. Now knowing that exempting these wetlands only means that they do not have to show avoidance and minimization changes my concern. I included it here since I already had it written down.

Thanks for the meeting today. I want to reiterate that I like the idea of some mitigation being required within the City of Ridgefield but I am unsure what that looks like.

PROCEDURE AND TIMELINE (amended)

Task	Timeframe
Commerce Checklist	Completed
BAS Literature review	Completed
Determine consistency with the Comprehensive Plan	January 2026
Agency and Stakeholder coordination	December 2025 & January 2026
Planning Commission work session and hearing	December - March
City Council work session and hearing	March and April
Prepare ordinance and supporting documents	April - May
Notice of Intent to Adopt sent to Commerce 60-days prior to adoption	April
Final City Council hearing	June
Send a complete and accurate copy of the critical area regulations to Commerce within 10 days after final adoption	June

Questions? Contact

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