

**From:** [Oliver Orjiako](#)  
**To:** [Jeffrey Delapena](#)  
**Subject:** FW: 2025 Comprehensive Plan Update And The Need For a Comprehensive Countywide Agricultural Lands Study [IMAN-WORKSITE.FID4096193]  
**Date:** Tuesday, April 1, 2025 1:39:40 PM  
**Attachments:** [0.png](#)  
[2025.03.31 Ltr to Clark Co. Board of Councilors.pdf](#)  
[image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

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FYI. For the comp plan index of record. Thanks.



**OLIVER ORJIAKO**  
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**From:** Lila L. Soelberg <Lila.soelberg@landerholm.com>  
**Sent:** Monday, March 31, 2025 4:56 PM  
**To:** steve.stuart <steve.stuart@ridgefieldwa.us>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Christine Cook <Christine.Cook@clark.wa.gov>  
**Cc:** Steve C. Morasch <stevem@landerholm.com>; HINS01\_000046 Jones \_ 412 NW 279th Street\_ Ridgefield E\_Mail <{F4096193}.Worksite@e7e78.imateage.work>  
**Subject:** 2025 Comprehensive Plan Update And The Need For a Comprehensive Countywide Agricultural Lands Study [IMAN-WORKSITE.FID4096193]

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All,

Attached please find correspondence from Steve Morasch to the Clark County Board of County Councilors regarding the above referenced matter. Please let us know if you have any questions.

Thank you,  
Lila

Lila L. Soelberg | Legal Assistant



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March 31, 2025

**VIA COURIER AND EMAIL**

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Clark County Board of County Councilors  
Attn: Sue Marshall, Glen Yung, Michelle Belkot,  
Wil Fuentes, and Matt Little  
1300 Franklin Street, Sixth Floor  
Vancouver, WA 98666

**Re: 2025 Comprehensive Plan update and the need for a comprehensive countywide agricultural lands study**

Dear County Councilors:

We represent Hinton Services, LLC (“Hinton”), who has been developing successful residential projects in Clark County for over 30 years. Hinton is under contract to purchase approximately 64 acres (APN 212566000, 212590000 and APN 212584000) in the proposed Ridgefield UGA for the purpose of developing needed housing. These parcels are currently zoned AG-20, and purchase is contingent on these parcels being de-designated and brought into the UGA in the 2025 cycle.

We understand the Board of County Councilors have tentatively decided NOT to undertake the required comprehensive countywide agricultural lands study, which is a necessary step to de-designating agricultural land during the 2025 growth management planning cycle. With respect, we request the Board of County Councilors to reconsider this decision.

Without a comprehensive countywide agricultural study, the County cannot lawfully include the any parcel zoned AG-20 in the UGA. The state administrative rules are quite clear on this point.

Urban areas cannot be expanded into agricultural land “unless no other option is available” (WAC 365-196-310(4)(c)(v)), and 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)). In fact, the periodic update of the comprehensive plan is the only time the County can consider de-designations of natural resources lands due to the requirement for a comprehensive county-wide agricultural study. Individual applicants cannot seek de-designation during annual review absent the required comprehensive countywide analysis.

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.”

Re: 2025 Comprehensive Plan update and the need for a countywide agricultural lands study  
Page 2

Finally, WAC 365-190-050(3) requires the County to look at whether “the land has long-term commercial significance for agriculture” based on the various factors listed in the rule.

Reading these rules together, the County must undertake a comprehensive review of all agricultural land in the County that analyzes the cumulative impacts and other adverse impacts of de-designating these parcels and other parcels the County may seek to de-designate and include in the UGA, and also looks at whether other options are available for meeting the County’s urban lands needs without de-designating lands zoned AG-20. The study should further consider the WAC 365-190-050(3) factors for determining whether any of this land has a long-term commercial significance for agriculture.

In order to meet its obligations under the Growth Management Act to provide for a 20-year land supply for residential uses to address the housing crisis, Clark County will need to bring some land zoned AG-20 into the UGA because there is insufficient land zoned for non-resource use (*i.e.*, rural residential) to meet the needs of the 20-year land supply.

However, if the County fails to conduct a comprehensive countywide agricultural study meeting these requirements, the County cannot bring any parcel zoned AG-20 into the UGA, and the County will be out of compliance with the GMA’s mandate for a 20-year land supply for residential housing. This would undermine the County’s ability to address the housing crisis.

Clark County’s own code requires the comprehensive countywide agricultural study in UDC 40.560.01.J.6, which precludes amending the UGA to include “lands that are designated as natural resource (agricultural, forest, mineral resource) unless such lands are de-designated pursuant to Chapter 36.70A RCW and Chapter 365-190 WAC.” The provisions of Chapter 365-190 WAC discussed above require the County to conduct a comprehensive countywide agricultural study.

We therefore respectfully request the County Board of Councilors reconsider this issue and undertake the required comprehensive countywide agricultural analysis.

Sincerely,

LANDERHOLM, P.S.



STEVE C. MORASCH  
Attorney at Law

SCM/rls

cc: Christine Cook  
Oliver Orjiako  
Steve Stuart