

From: [Jeffrey Delapena](#)
To: [Olivia Zimmerly](#); [Cnty 2025 Comp Plan](#)
Cc: [Oliver Orjiako](#); [Jose Alvarez](#); [Jenna Kay](#)
Subject: RE: Comprehensive Plan Update 2025 - Comments for DEIS
Date: Wednesday, November 26, 2025 4:49:04 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good day, Olivia,

Thank you for this feedback related to the Draft Environmental Impact Statement for the 2025 Comprehensive Plan Update.

I have forwarded your comments to additional Staff and will enter these into the Index of Record.



Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558



NOTICE OF PUBLIC DISCLOSURE: This e-mail account is public domain. Any correspondence from or to this e-mail account may be a public record. Accordingly, this email, in whole or in part may be subject to disclosure pursuant to RCW 42.56, regardless of any claim of confidentiality or privilege asserted by an external party.

From: Olivia Zimmerly <zimmerlyolivia@icloud.com>
Sent: Wednesday, November 26, 2025 4:33 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Cc: Sue Marshall <Sue.Marshall@clark.wa.gov>; Matt Little <Matt.Little@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>
Subject: Comprehensive Plan Update 2025 - Comments for DEIS

You don't often get email from zimmerlyolivia@icloud.com. [Learn why this is important](#)

EXTERNAL: This email originated from outside of Clark County. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Chair Sue Marshall and Council Members,

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS). I appreciate the extensive work that has gone into evaluating growth alternatives for Clark County and the detailed analysis of environmental, transportation, economic, and land-use impacts. After reviewing the DEIS and the three proposed land-use alternatives, I offer the following key comments for your consideration.

1. Transportation, Vehicle Trips, and Emissions

The DEIS clearly shows that **Alternative 2 performs best** in nearly every transportation-related measure:

- **Alternative 2** results in the **lowest total vehicle/person trips** and **lowest vehicle miles traveled (VMT)** (DEIS p. 5, Table 4).
- It also results in **lower vehicle emissions**, which directly reduces climate impacts (p. 11).
- **Alternative 1 produces the highest VMT, VHT, congestion, and daily Columbia River bridge crossings**, with more than 3,200 additional daily crossings compared to Alternative 2 (pp. 155–156).
- **Alternative 1 has the highest impact on school transportation** (p. 155) and the highest congestion at regional chokepoints.
- **Alternative 2** offers fewer person trips, lower delay, and substantially improved traffic performance.

These findings make clear that **Alternative 2** is the most transportation-efficient and climate-responsible option.

2. Parks and Open Space

Table 4 of the DEIS lists **no change** to Ridgefield's parks and open space under Alternative 2, but this is inaccurate.

Alternative 2 includes 50 additional acres of parks and open space within the North Ridgefield Expansion Area, increasing Ridgefield's parkland from approximately 80 acres to **130 acres**.

This should be corrected to accurately reflect the significant benefit **Alternative 2** provides in meeting long-term parks, recreation, and open space needs.

3. Resource Lands and Long-Term Commercial Significance

The DEIS notes that the GMA requires protection of resource lands with true long-term commercial significance (p. 45).

The North Ridgefield Expansion Area **does not meet this standard** due to its fragmentation by wetlands, slopes, creeks, and soil limitations. These characteristics severely restrict agricultural viability. Many of these lands cannot be farmed economically.

4. Rural Lands, Urban Sprawl, and Growth Management

The DEIS emphasizes directing growth to areas where facilities can be efficiently extended (p. 116).

The North Ridgefield Expansion Area meets this criterion: major infrastructure and services—including Costco, In-N-Out, and other commercial uses—already exist immediately to the south.

Key DEIS findings include:

- **Alternative 2** converts only **0.6% of rural land** and just **1% of agricultural land**, which the DEIS states is **not a substantial loss** (p. 131).
- Failure to grow where cities are already expanding results in **urban sprawl**, which the DEIS warns against.

The area is already bordered by city limits on three sides and is planned for urban transition, as it has been held in Urban Reserve since 1994. Allowing Ridgefield to grow northward is efficient, logical, and consistent with the GMA's intent.

Under the County's current comprehensive plan, the Urban Reserve Overlay is applied to areas at the edge of Urban Growth Boundaries to prevent premature land division or development that could hinder efficient future urban growth. These lands are identified as potential future additions to Urban Growth Areas and may be incorporated through Comprehensive Plan amendments as needed.

Given Ridgefield's substantial growth over the past several decades, the urbanization of these lands is both appropriate and timely. The City of Ridgefield has affirmed in its letters that this area is critical to meeting its future growth needs.

5. Air Quality

The DEIS confirms that:

- **Alternative 1 has the highest air quality impacts** due to elevated VMT, VHT, congestion, and additional bridge crossings (p. 51).
- **Alternative 2 has the lowest air quality impacts**, with the fewest trips and miles

traveled (p. 52).

Given that mobile sources remain the region's largest contributor to air pollution, **Alternative 2 offers a significant air-quality advantage.**

6. Climate Impacts

Alternative 1 results in the highest greenhouse gas emissions and therefore contributes most significantly to climate impacts (p. 52, p. 54).

Alternative 2 produces substantially fewer emissions and is the environmentally superior alternative for long-term climate considerations.

7. Population Growth

Ridgefield has experienced extraordinary growth—**672% since 2000** (p. 108).

Alternative 2 aligns with this continued trend and ensures the city can responsibly accommodate population increases.

8. Housing Capacity

Under **Alternative 2**, Ridgefield is able to:

- Provide housing for households at **80% AMI or below**, as required.
- Increase residential density.
- Support additional employment and service needs (p. 129).

Alternative 1 does not provide this needed capacity.

9. Employment Capacity

The DEIS is unequivocal:

- **Under Alternative 1, none of the jurisdictions meet their job targets**, leaving the County 5,000+ jobs short (pp. 125–126).
- **Alternative 2 meets the required employment capacity** for the County (p. 132).

Supporting jobs where people already live is essential for reducing commuting, emissions, and congestion.

10. Emergency Services

Alternative 2 provides the needed property for future **fire and emergency medical services** expansion—an important public safety benefit (p. 199).

For all the reasons outlined above—including transportation efficiency, reduced emissions, expanded parks, better alignment with infrastructure, improved employment capacity, and minimized environmental impacts—I respectfully urge the County to adopt **Alternative 2** as the preferred option.

Alternative 2 best fulfills the Growth Management Act’s goals, supports long-term planning needs, and represents the most sustainable and responsible pathway for accommodating the County’s future growth.

Thank you again for the opportunity to comment.

Sincerely,

Olivia Zimmerly
Z2O, LLC
Founder & Principal