

From: [Jeffrey Delapena](#)
To: [Dennis Zimmerly](#)
Cc: [Cnty 2025 Comp Plan](#); [Oliver Orjiako](#); [Jose Alvarez](#); [Jenna Kay](#)
Subject: RE: Response to Land Use Alternatives - DEIS
Date: Monday, December 1, 2025 9:06:35 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good day, Dennis,

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



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From: Dennis Zimmerly <clearrockinv@gmail.com>
Sent: Friday, November 28, 2025 8:07 AM
To: Sue Marshall <Sue.Marshall@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>; Matt Little <Matt.Little@clark.wa.gov>
Cc: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Subject: Response to Land Use Alternatives - DEIS

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Chair Marshall and Council Members,

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement and the Alternatives presented for Clark County's comprehensive plan update. We appreciate the extensive analysis that has gone into outlining the requirements of the Growth Management Act (GMA), the purpose of the plan update, and the evaluation of options for accommodating population and employment growth through 2045.

First, we encourage the County Council to only consider Alternatives 2 and 3. The properties along I-5 have been designated Urban Reserve since 1994—a designation that has always acknowledged the inevitability of future urbanization. It is not a question of *if* these lands will urbanize, but *when*. Given the City of Ridgefield's needs for growth as outlined in their letters—particularly for affordable housing, employment opportunities, and coordinated urban expansion, the time has clearly come. These properties have long been identified as future additions to Urban Growth Areas.

When the Urban Reserve designation was applied in 1994, the GMA did not yet require regulation of Critical Areas using Best Available Science; that requirement came nearly a decade later. Today, based on the County's current critical areas mapping, the land's agricultural viability is significantly constrained—even before considering that obtaining new water rights is impossible due to the closure of the Lewis River basin. As a result, continued agricultural designation for land located directly along I-5 between Ridgefield and La Center is neither practical nor reflective of actual on-the-ground conditions.

The property's surroundings further demonstrate why **Alternative 2** represents the most logical, efficient, and internally consistent approach. The North Ridgefield Expansion Area—"Characterized By Urban Growth"—is surrounded by city limits on three sides and directly abuts I-5, where State planned overcrossings at 289th Street and N 10th Street. Across the freeway lies the Seventh-day Adventist regional headquarters. To the west is the Paradise Pointe subdivision, and to the south is the rapidly expanding Costco/In-N-Out commercial district. Additionally, the Cowlitz Tribe within a mile, continues to acquire properties between La Center and Ridgefield, driving further urbanization along the Discovery Corridor. These are not rural conditions; they are unmistakably urban, and the existing Urban Reserve designation accurately anticipated this transition.

The DEIS introduction notes that "*in some cases, expansion will be the logical response to the projected urban growth.*" **Alternative 2** is precisely such a case."

Under **Alternative 2**, the proposed expansion areas are exceptionally well suited for incorporation:

- One expansion area is bordered by city limits on three sides, and the other on all four, making them functionally part of Ridgefield's existing urban landscape.
- It provides expansion capacity necessary for state-required affordable housing (80% AMI

or below).

- It supports employment growth, with the potential to generate approximately 800 jobs.
- It provides land for a new fire and emergency services station, improving response efficiency.
- It adds 50 acres of new parks and open space, along with trail connections linking to the Costco retail center.

Alternative 2 directly aligns with the County's objectives of determining where UGA boundaries should adjust and identifying appropriate land uses to meet long-term community needs. Concentrating growth in areas already linked to Ridgefield's infrastructure and development patterns is fiscally responsible, environmentally sound, and consistent with regional planning objectives.

The DEIS further underscores this point:

"Under Alternative 1, neither the County nor any of the jurisdictions would have the capacity to accommodate their job targets, falling short by more than 5,000 jobs." (DEIS p. 125)

This shortfall would undermine the County's economic goals and increase commuting to other regions.

For these reasons, we respectfully urge the County to recognize **Alternative 2** as the clear choice. It represents the most logical, environmentally responsible, and most effective pathway for accommodating growth under the GMA over the next 20 years. By directing development to areas that are already designated, planned, and bordered by existing urban infrastructure, Alternative 2 not only minimizes environmental impacts but also ensures efficient, sustainable use of land and resources.

Thank you.

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Dennis Zimmerly
503-522-2200