

From: [Jeffrey Delapena](#)
To: [steve.stuart](#); [Cnty 2025 Comp Plan](#)
Cc: [Oliver Orjiako](#); [Janean Parker](#); [Claire Lust](#); [Jenna Kay](#); [Jose Alvarez](#)
Subject: FW: Comp Plan DEIS Comments
Date: Monday, December 1, 2025 10:15:39 AM
Attachments: [image001.png](#)
[DEIS Comment Letter Ridgefield.docx](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Good day, Steve,

Thank you for submitting the City of Ridgefield's feedback related to the Draft Environmental Impact Statement for the 2025 Comprehensive Plan Update.

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



Jeff Delapena
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From: Steve Stuart <Steve.Stuart@ridgefieldwa.us>
Sent: Saturday, November 29, 2025 6:32 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>; Sue Marshall <Sue.Marshall@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Matt Little <Matt.Little@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>
Cc: Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Janean Parker <janean@jzparklaw.com>; Claire Lust <Claire.Lust@ridgefieldwa.us>
Subject: Comp Plan DEIS Comments

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Good afternoon Chair Marshall,

Please see – attached – the City of Ridgefield’s Comp Plan DEIS and Ag Study comments. They are being submitted to the official Comp Plan email address, but since the comments are addressed to you and the other County Councilors I wanted to assure they were delivered directly as well.

I hope you had a great Thanksgiving and look forward to seeing you again soon.

Best,
Steve



Steve Stuart

City Manager | City Hall

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Clark County Council
1300 Franklin Street
Vancouver, WA 98660

November 29, 2025

Dear Chair Marshall and fellow members of the Clark County Council:

Thank you for the opportunity to comment on Clark County's Draft Environmental Impact Statement (DEIS) published October 1, 2025. Due to the anticipated influence of the recently completed Clark County Agricultural Lands Study (Ag Study) on the County Council's adoption of a preferred DEIS land use alternative, the City also offers comments on the Ag Study.

Ridgefield preferred alternative. Following an extensive community engagement campaign, the Ridgefield City Council adopted a preferred land use alternative for its 20-year growth management plan. The preferred alternative meets local and state requirements for providing adequate housing options for all income strata as well as balancing housing growth with local jobs, using a combination of mixed-use hubs and targeted UGA expansion areas. It represents our community's vision and closely aligns with DEIS Alternative 2.

Clark County Alternative (1). The City would like to better understand the County's vision and underpinnings in Alternative 1. Fundamentally, the County's Alternative does not seem to meet requirements of RCW 36.70A.110(2), which states that the "county and each city within the county shall include areas and densities sufficient to permit the urban growth that is projected to occur in the county or city for the succeeding twenty-year period". The County recognizes on page 5 of the DEIS that Alternative 1 "as planned would not have sufficient land capacity to accommodate all of the additional housing and job growth projected for the next 20 years." The County notes that keeping the current boundaries and meeting required growth targets would "require upzoning or increasing densities...in existing UGAs." However, the County has not shown any legal mechanisms for how unincorporated and incorporated areas would – as part of their independently adopted Comp Plans and zoning authorities – adopt necessary upzoning that is not legally



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required by the State. To better understand both the vision and capacity assumptions of Alternative 1, the City would ask that this legal inconsistency be addressed in the FEIS and updated Alternative 1 maps be created to allow residents and decision-makers the ability to accurately evaluate expected densification in existing communities.

Discrepancies between County and City numbers.

- 1) One key discrepancy lies in the assumed housing capacity and observed growth since 2015. The adopted 2016-2035 Ridgefield Urban Area Comprehensive Plan identifies a 2015 population estimate of 6,400 and a 2035 population projection of 25,494 – an increase of 19,094 residents. At 2.66 persons per household, this was calculated to be an equivalent increase of 7,178 households in the 2016-2035 plan. The 2025 DEIS identifies capacity for housing units in the current City UGA as 7,392 housing units. Per OFM, Ridgefield’s population in 2023 was 15,180 – an increase in 8,780 residents or 3,300 housing units since 2015. Since the UGA did not expand during this time, one may conclude that the UGA capacity therefore decreased from 7,392 housing units to 4,092 housing units between 2015 and 2023. However, the 2023 VBLM on which the DEIS is predicated produces a capacity of 5,815 housing units.

If 3,300 housing units were built in Ridgefield between 2015 and 2023, and the UGA was not expanded, how did the UGA capacity increase by 1,723 units (5,815 less 4,092)? This logical inconsistency is fundamental in the County’s assertion that the City has adequate capacity to accommodate its population allocation in the existing UGA. The City asks that this is addressed in the FEIS.

- 2) Ridgefield’s housing allocation is 5,815 housing units. Under DEIS Alternative 1, Ridgefield’s yield is 5,821 housing units. Under DEIS Alternative 2, Ridgefield’s yield is 11,436 housing units, an increase of 5,615 units attributed to the targeted expansion areas. When Ridgefield staff and consultants calculate yield for the Ridgefield City Council’s preferred land use alternative, the resulting yield in the expansion areas is fewer than 5,615 units and the overall yield is fewer than 11,436 units. There is no explanation in the DEIS to account for this discrepancy, which is also fundamental to the County DEIS conclusion that the City has adequate capacity in the existing UGA for population allocation. The City asks that this discrepancy be evaluated and addressed in the FEIS.



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- 3) The County makes assumptions in the VBLM which overestimate the amount of developable acreage available in the City's UGA. These assumptions seem to be based primarily on applying broader countywide data instead of the City's specific development constraints. However, legally-allowed analysis of local circumstances under WAC 365.196.310 to analyze UGAs shows that the countywide data do not match the reality of development potential in the City UGA. The City asks that these discrepancies be analyzed and resolved in the FEIS.
 - o Infrastructure deduction. On Page 1 of the DEIS, the planning assumption applied countywide for residential "percent of land assumed for infrastructure" is 31.5%. However, in Ridgefield, residential Planned Unit Developments and residential portions of horizontal mixed-use developments are required to set aside 25 percent of the gross site area as open space in addition to standard deductions for facilities such as storm ponds and right-of-way. Thus, the actual residential infrastructure deduction in Ridgefield is almost 50%.
 - o Critical areas protection. On Page 1 of the DEIS, it is assumed that 50% of potentially critical land is not critical and will develop. However, in Ridgefield, the observed percentage of critical areas and buffers protected during development exceeds the standard of 50 percent assumed in the VBLM.
 - o Market not to convert factor. On Page 1 of the DEIS, it is assumed that 90% of vacant residential inventory is expected to develop in the planning timeframe. However, observed rates of development in Ridgefield have greatly exceeded county averages annually from 2016-2025. Thus, the City's data-based expectation for the planning period is closer to 95% of vacant residential inventory expected to develop.
- 4) Gee Creek Plateau and Carty Road Subarea Plans. The Gee Creek Plateau Subarea Plan (adopted 2017) and Carty Road Subarea Plan (adopted 2022) each established as low-density residential areas through extensive public processes. These areas both have extensive environmental and topographic challenges/opportunities which were embraced by City Councils to create unique urban communities. Together, these subareas represent a significant portion of the buildable residential land within the existing UGA (approximately 625 gross acres). Capacity analyses based on the preferred zoning and enhanced critical area protections were conducted for each subarea and the resulting housing yields were adopted into the subarea plans. It is unclear what the DEIS yields for each subarea and if they comply with the adopted subarea plans.



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- 5) Discrepancies in job yields under Alternative 2. Ridgefield’s employment allocation is 8,175 jobs. Under DEIS Alternative 2, Ridgefield’s yield is 7,297 jobs, creating a deficit. When Ridgefield staff and consultants calculate yield for the Ridgefield City Council’s preferred land use alternative using the same jobs per acre assumptions, the resulting yield is over 8,175 jobs. How was the figure of 7,297 jobs calculated?
- 6) Overrepresentation of AG land to be converted under Alternative 2. The DEIS identifies gross acreage of agricultural lands that would be de-designated in Alternative 2. Critical areas are not excluded from the gross acreage as is common practice in land use analyses. This results in an overestimation of the total acreage of agricultural land that would be converted on the properties adjacent to the Ridgefield UGA subject to site-specific UGA expansion requests, which are significantly encumbered by critical areas. The City would like to see this calculation updated in the DEIS.

Clark County Agricultural Lands Study

The City appreciates the County conducting a countywide agricultural lands study as required by WAC 365-190-050(1) when considering resource land designation and de-designation decisions. Beyond the relevance to the DEIS and site-specific decisions, the City is supportive of the inquiry to truly identify and protect farming as a natural resource industry contemplated in Goal 8 of the GMA. The 2025 study contains a lot of essential information that can help guide these decisions in Clark County. Unfortunately, the report’s “determinations” and “final evaluation” consciously ignore much of that information while purporting not to make recommendations.

- 1) On page 9 of the Ag Study, it is accurately stated that for a legally sufficient review of whether resource land designations are appropriate, “the first factor for agricultural resource lands is that the land is not characterized by urban growth”. However, without any legal analysis or support, the report determines that only “[l]ands within existing UGA boundaries were considered characterized by urban growth and excluded from the agricultural land base”. The Growth Management Act is clear in RCW 36.70A.030(48) that “[c]haracterized by urban growth" refers to land having urban growth located on it, or to land located in relationship to an area with urban growth on it as to be appropriate for urban growth.” Further, the Court of Appeals in Clark County WA LA GM LLC v. Western WA Growth Management Hearings Review Board (2011), ruled that under the “first prong of



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the Lewis County test, the statutory definition of “urban growth” requires an assessment of the overall context of the land’s relationship to the surrounding land—not just an evaluation of the land itself. See former RCW 36.70A.030(18); Lewis County, 157 Wash.2d at 502, 139 P.3d 1096”

Thus, the Ag Study must also consider the relationship between properties being analyzed and the area surrounding it. This analysis is especially important to accurately classify site-specific requests adjacent to existing City UGAs being studied in Alternative 2 of the DEIS.

- 2) To adequately review whether lands are “characterized by urban growth”, given the required analysis above, there are a number of essential criteria under WAC 365-190-050(3)(c) that help evaluate lands for long-term commercial significance. These include:
 - a. (c)(ii) The availability of public facilities;
 - b. (c)(iv) The availability of public services;
 - c. (c)(v) Relationship or proximity to urban growth areas;
 - d. (c)(vii) Land use settlement patterns and their compatibility with agricultural practices;
 - e. (c)(viii) Intensity of nearby land uses; and
 - f. (c)(ix) History of land development permits issued nearby.

The Ag Study included information about all the WAC criteria specified above. However, drafters of the study made the “determination” that none of these essential criteria would be “included in the final evaluation”. Drafters’ reasoning in the report for these actions suffer from two key flaws. First, by creating an inappropriately narrow definition of lands “characterized by urban growth”, drafters avoid any evaluation of land in the context of adjacency to that which is already in a UGA ((c)(ii), (vii), (viii), and (iv)). Second, while emphasizing criteria with a significant positive impact on commercial significance for agricultural production such as tax status ((c)(iii), the drafters specifically eliminate criteria with a significant negative impact ((c)(iv) and (v)). There is no guile in this narrow and slanted analysis. For example, when sharing the “determination” of whether to include availability of public services in the final evaluation model, drafters state that “[t]he use of applying public service proximity as a negative indicator for commercial significance (as often has been in practices by other peer counties) raises concerns due to its sizeable effect on existing agricultural land



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designations.” Thus, a relevant, important criterion which drafters say should be “considered very carefully” is ignored because of what it might show.

As stated above, the data are there in the Ag Study for the County Council to accurately determine whether resource lands meet requirements for long-term commercial significance. They just need to be considered appropriately and comprehensively, as part of a public process including our elected leaders, stakeholders, and jurisdictional partners. We look forward to becoming a participant in that public process. With a full picture of what long-term commercially significant farming looks like in Clark County, we can have real conversations regarding the ways to help those areas best suited for local food production, and those where the highest and best use is providing urban jobs and affordable housing.

Thank you once again for the opportunity to comment on the Draft Environmental Impact Statement and Agricultural Lands Study. The City’s staff and Council will continue working toward a robust community vision which is consistent with both State law and the County’s work, and look forward to robust conversation and coordination with County staff and Council to assure that consistency and shared positive outcomes.

Sincerely,

Steve Stuart, Ridgefield City Manager

CC: Claire Lust, Ridgefield Community Development Director
Janean Parker, Ridgefield City Attorney
Clark County Community Development c/o Oliver Orjiako, Director