

**From:** [Rebecca Messinger](#)  
**To:** [Oliver Orjiako](#); [Jose Alvarez](#); [Jeffrey Delapena](#)  
**Subject:** FW: COMP Plan testimony  
**Date:** Wednesday, January 7, 2026 12:20:49 PM  
**Attachments:** [COMP plan comments final 1 7 26.odt](#)  
[image001.png](#)

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Hello,

Please see the below email / attached letter. Thank you!



**Rebecca Messinger**  
Clerk to the Council  
COUNTY MANAGER'S OFFICE

Phone: 564-397-4305  
Email: [Rebecca.Messinger@clark.wa.gov](mailto:Rebecca.Messinger@clark.wa.gov)



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**From:** Jim Byrne <[byrnejim7@gmail.com](mailto:byrnejim7@gmail.com)>  
**Sent:** Wednesday, January 7, 2026 10:15 AM  
**To:** Rebecca Messinger <[Rebecca.Messinger@clark.wa.gov](mailto:Rebecca.Messinger@clark.wa.gov)>  
**Subject:** COMP Plan testimony

**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.

Rebecca,

Happy New Year! Would you please pass my testimony to the Planning Commissioners and County Councilors. Thank you in advance. Jim

COMP Plan Comments:

My name is Jim Byrne. I have lived in Ridgefield, and Clark Co. for 34 years. I appreciate the

opportunity to comment on the current Comp Plan.

I support Alternative 1 - with no expansions of the UGA's. Ridgefield advocated for the County's Agriculture lands study, and now is dissatisfied with results. County staff recommends "No", on expanding Ridgefield's UGA. Staff says all cities can accommodate population growth in existing UGAs. Support Co. staff.

I attended two of Ridgefield's community engagement meetings. There was no clear growth consensus. Alternative 1 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. Ridgefield's housing allocation is 5,815 housing units. Under DEIS Alternative 1 (No Action), Ridgefield's yield is 5,821 housing units, six more than needed.

The County makes assumptions in the VBLM which estimate the amount of develop-able acreage available in the City's UGA. The City doesn't agree. These assumptions seem to be based primarily on applying broader countywide data instead of the City's specific development constraints. Go with the County numbers, they are less biased.

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. Again, the city and County are arguing over numbers. Go with the County's numbers.

Clark County committed to an Agricultural Land Study and creating an agricultural commission. Ridgefield and La Center were proponents. This study determined there was much non-designated agriculture land with appropriate soils. The commission confirms Ag land is in short supply and none should be removed via re-designation.

The County is required to consider climate change in its planning. Ag land and open space is more resistant to climate change than the asphalt and concrete of new developments. The new developments will promote sprawl and increase driver mileages.

Ridgefield is always aggressive in converting Ag lands. Between 2017 and 2022, Clark County lost 34,699 acres of land in farms (38.24%/ USDA). We got in return: lots of single family housing; overpriced and not so not affordable; increase of traffic; lagging infrastructure; lower water tables; and an In-and-Out Burger. Ridgefield, in the last Comp Plan revision made a premature annexation of Ag-20lands. The WWHB review said this inclusion violated the GMA. A revision to the GMA was passed in the legislature to avoid this re-occurring, but the damage was done. Let's not repeat this time.

I'd like to point out two examples of proposed farm land conversion, both of which, according to the Agricultural lands study meet the criteria for AG Lands of long term commercial significance . The first is the Jones Farm Business Park. It is 79 acres, located adjacent to the new elementary school. Second, is the Greely Farms #2b & 2c; a 32 acre parcel with 261 lots. Also, Greely Farms #3 with 40 acres and 179 lots. Greely Farms #4; 59 acres with 109 lots.

The GMA requires concurrency. Growth can't take place, until the infrastructure is in place. So, that makes 449 new houses built on former actively farmed Ag land served by the same existing 2 lane farm roads. This does not include the traffic of moms dropping off and/or

picking up their kids at the new elementary school. Unless roads are upgraded this is a recipe for disaster, and an admission that Clark County's Growth plan has failed. The County's refusal to agree to this expansion is appropriate.

I also support the comments made by both Futurewise and FOCC that Alternatives 2 & 3 are not needed. Futurewise states, "The 519 acres that Ridgefield and LaCenter are requesting to pave over forever are prime agricultural lands and farmlands of statewide importance and meet other criteria for lands of long term commercial significance. Consequently, these lands cannot be legally designated under WAC 365-190-040(10)(c)."

Thank you for your time and attention.

Jim Byrne

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