

From: [Jeffrey Delapena](#)
To: ["Steve C. Morasch"](#)
Cc: [Oliver Oriako](#); [Jose Alvarez](#); [Rebecca Messinger](#)
Subject: RE: County Council, Planning Commission To Hold Joint Hearing On Preferred Land Use Alternative For Comprehensive Plan Update - Jan 8 2026 Meeting Comments
Date: Thursday, January 8, 2026 10:48:00 AM
Attachments: [0.png](#)
[2026.01 Ltr to Clark Co. Board of Co. Councilors\(7466258.1\).pdf](#)
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[image003.png](#)
[image004.png](#)

Good day, Steve,

Thank you for providing feedback ahead of the Joint Hearing to select the Preferred Land Use Alternative for the 2025 Comprehensive Plan Update.

I am forwarding to additional members of Staff. Your comments will be brought to the attention of the Council and Planning Commission ahead of the Hearing and be added to the Index of Record.

Best,



Jeff Delapena
Program Assistant
COMMUNITY PLANNING

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Subject: County Council, Planning Commission To Hold Joint Hearing On Preferred Land Use Alternative For Comprehensive Plan Update - Jan 8 2026 Meeting Comments

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Attached are my written comments on the preferred alternative. Please include my written comments in the record. Thank you.

Steve C. Morasch | Attorney at Law



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January 8, 2026

VIA FIRST CLASS MAIL AND EMAIL

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Clark County Board of County Councilors
Attn: Sue Marshall, Glen Yung, Michelle Belkot,
Wil Fuentes, and Matt Little
PO Box 5000
Vancouver, WA 98666-5000

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 support the City of Ridgefield’s request to include these parcels in Alternative 2 and in the new UGA to be adopted with the upcoming comprehensive plan. The property owners have previously submitted a report by Johnson Economics determining that these parcels do not have long-term commercial significance for agriculture supporting the urbanization of these parcels.

These parcels are ideal for inclusion in the UGA because they are not suitable for commercial agriculture and:

1. The parcels border the City limits.
2. Dense residential development exists just to the west of the parcels.
3. A new school site is south of the parcels (in fact the Joneses sold the parcel to the Ridgefield School District).
4. Urban services border the parcels, including sewer and water.
5. NW 279th Street will be improved to City standards with the school development.
6. Most property along the fringes of the current UGA are also in an agricultural designation so there necessarily will need to be some conversion of AG lands for the UGA to expand. The Joneses parcels do not have long-term significance for agricultural production given

their proximity to the City limits and for other reasons as stated by Mr. Jones in his comments and for the reasons set forth in the agricultural study previously submitted by Johnson Economics.

Urban areas can be expanded into agricultural land when “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)).

Now that the Board of County Councilors have completed the required comprehensive countywide agricultural lands study, which is a necessary step to de-designating agricultural land during the 2025 growth management planning cycle, these parcels are well suited for inclusion in the UGA.

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.”

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. Based on both the Johnson Economics study as well as the comprehensive countywide agricultural lands study and Mr. Jones testimony, these parcels have no long-term commercial significance for agriculture.

Further, the comprehensive countywide agricultural lands study identifies no cumulative impacts would be caused by urbanization of these parcels. In fact, the comprehensive countywide agricultural lands study found that similar agricultural land to be common throughout Clark County, so the loss of a mere 64 acres that is already impacted by urban growth will have no adverse cumulative impacts.

Finally, there is no other option because the City of Ridgefield is quite literally surrounded with agricultural lands. So there is no other option to meet the housing needs of the City of Ridgefield.

We therefore respectfully request the County Board of Councilors to include these parcels in Alternative 2 and to ultimately include them in the new UGA.

Sincerely,

LANDERHOLM, P.S.



STEVE C. MORASCH
Attorney at Law

SCM/rls

Re: 2025 Comprehensive Plan update and the need for a countywide agricultural lands study
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cc: Christine Cook
Oliver Orjiako
Steve Stuart
Claire Lust