

From: [Jeffrey Delapena](#)
To: "jmaul@geminienvironmentalstrategies.com"
Cc: [Oliver Orjiako](#); [Jose Alvarez](#)
Subject: RE: Comments on Selection of Preferred Alternative for the 2025 Comprehensive Plan Update
Date: Thursday, January 29, 2026 3:43:00 PM
Attachments: [L Planning Commission 012926.pdf](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good day, Jim,

Thank you for providing this feedback for the Hearing to select the Preferred Land Use Alternative.

I am forwarding to additional members of Staff. Your comments will be brought to the attention of Planning Commission ahead of tonight's continuation of the Hearing to select the Preferred Land Use Alternative. This will also be added to the Index of Record.

Best regards,



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: James Maul <jmaul@geminienvironmentalstrategies.com>
Sent: Thursday, January 29, 2026 3:41 PM
To: Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Cc: Sue Marshall <Sue.Marshall@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Matt Little <Matt.Little@clark.wa.gov>; steve.stuart@ridgefieldwa.us; Claire Lust <Claire.Lust@ridgefieldwa.us>

Subject: Comments on Selection of Preferred Alternative for the 2025 Comprehensive Plan Update

Some people who received this message don't often get email from jmaul@geminienvironmentalstrategies.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 Mr. Delapena,

Please accept my written comments (attached) on the matter above.

Thank you,

Jim Maul

James J. Maul

1.360.903.8633

FROM:
Jim Maul
PO Box 488
Ridgefield, WA 98642

TO:
Clark County Planning Commission
1300 Franklin Street
PO Box 9810
Vancouver, WA 98666-9810

RE: Comprehensive Plan Update – City of Ridgefield Preferred Land Use Alternative 2
Maul Property

Dear Commissioner Johnson and Planning Commission Members,

I appreciate the opportunity to provide testimony at the January 8, 2026 joint hearing before the Planning Commission and County Council in support of Ridgefield's preferred land use alternative for its 20-year growth management plan and specifically the removal of the inappropriate agricultural designation. Our property is located at 23511 NW Hillhurst Road and is comprised of tax lots 216491000 and 216473000. In combination, the tax lots comprise 11.5 acres (please see attached Ridgefield Zoning Map). The property is currently inaccurately zoned Agriculture (AG). The property is located on the corner of an important transportation hub, the intersection of Carty and Hillhurst Roads.

As explained by Oliver Orjiako in his letter to me dated May 13, 2015, our family's property was included in Ridgefield's UGA through the 2007 Comprehensive Plan update (see Attached Letter from Mr. Orjiako). It was arbitrarily removed due to legal challenges and ironically returned to an AG-20 zoning when the property is in reality only comprised of around 11 acres. My parents were elderly and living on a fixed income and could not afford the cost of a legal challenge. We assumed that we would logically become part of the city during the next Comprehensive Plan update because of Ridgefield's continued growth. We hope that the continued erroneous designation of the property as agricultural property does not continue to prevent the proper zoning of the property and benefits accompanying the highest and best use of the property.

As I testified, my family's property (the Maul Property) does not meet the criteria established for an agricultural designation, the three core factors necessary for an agricultural designation:

- The property is completely characterized by urban growth on all sides of the 11-acre property. It is a relatively small donut hole and surrounded by the City of Ridgefield.
 - Portions of the property are being considered for public use facilities, for example, a new fire station.
- Soil type – the characterization of the Maul Property as prime agricultural land is deeply flawed. Almost half of the property is underlain by dense poorly drained soil that is not suited for crops of grazing. Furthermore, the same area is a sensitive

environment because it is home to a number of protected Oregon White Oak trees, which our family intends to preserve.

- Because of its small size, the property not viable for commercial agriculture. The property has never been used for agricultural purposes.

This purpose of this letter is to follow up on my verbal testimony at the joint hearing with additional information regarding the inconsistency and non-compliance to the planning goals of the Washington state Growth Management Act (GMA) as it relates to the proposed designation of my family's property located in Ridgefield, Washington ("the Maul Property").

The zoning designation as Agriculture is both inconsistent and incompatible with property immediately adjoining and located on all sides of our property and is not consistent to the stated goals of the GMA. Our property has never been used for agriculture and is not currently suited for agricultural purposes. Our property is taxed at full market value and has never been placed into a current use tax deferred taxation status. The Maul Property is completely surrounded by the City of Ridgefield and located adjacent to urban traffic corridors, large residential subdivisions, and the Ridgefield schools and sports complex (see attached Ridgefield Zoning Map and photos that show the urban nature of the property).

We believe the current zoning designation as "agriculture" for our property is non-compliant to the GMA's stated goals pertaining to identifying and designating "Commercially Significant Agricultural Lands." In its letter dated November 29, 2025 the Ridgefield points out the flawed design of the recently completed Ag Study (e.g., does not consider the property's economic viability). This determination is also consistent with a memorandum from Oliver Orjiako in which he outlines for the Planning Commission the Criteria for Choosing a Preferred Alternative (January 8, 2026). Currently, our property has two legal lots with one single family residence. Because of the surrounding land use and immediately adjacent urban development, our property does not conform to the surrounding urban uses and as stated above, has no viable Commercially Significant Agricultural Use as defined by GMA. This situation will further create a planning inconsistency in an area that is clearly planned and intended for urban uses and will not conform to the surrounding development.

We feel that this designation, if left intact, will negatively impact future development and uses in the area and place an undue burden and unnecessary restriction on the use of our property. Also, because the property is not commercially viable for agriculture, it will be underutilized and will not achieve its potential for economic development, job creation, and contribution to the community's tax base.

Further, please consider that our property is fully served with the necessary infrastructure to facilitate its inclusion into Ridgefield's Urban Growth Area (UGA). By including our property in Ridgefield's UGA and re-designating it to an urban designation, this will create a plan for the sub-area that is more consistent. It will integrate and can serve neighboring land uses and development. Further, by including our property in the Ridgefield UGA, we believe that there will be no loss of commercially viable agricultural land in the area because our property is currently not Commercially Viable Agricultural property.

Our property, if developed to urban road and frontage standards would provide a more viable multi-modal transportation corridor. Additionally, it will enhance public safety at an intersection that will see significant increases in automobile, pedestrian, and bicycle traffic volumes. Conversely, if left in an agriculture or rural designation there would be no frontage improvements resulting in a reduction in transportation viability and public safety in the area.

In summary, we believe it is clearly in Clark County and the city of Ridgefield's best interests to include our property in Ridgefield's UGA for the following reasons:

- The property does not meet the definition of Commercially Significant Agricultural Land.
- The urban designation is compatible and consistent with surrounding uses. The AG designation is not.
- An urban designation will be beneficial for providing services for surrounding urban uses and will increase the tax base and create jobs.
- The Property is fully served by the city of Ridgefield's Capital Facility Plan.
- Including the Property in Ridgefield's UGA will have substantial benefits to the transportation corridor and public safety improvements and will complement the surrounding planned urban public and private development in the area.
- The property forms the corner of an important and busy intersection and lack of future improvements will diminish the quality of future development in the area.

We respectfully ask that you recommend that the Maul Property be added to Ridgefield's UGA.

Thank you for your consideration. Please call me if you have questions. I can be reached at 360.903.8633.

Sincerely,


Jim Maul

Att.: Zoning map
Photos showing urban nature of property
Letter from Oliver Orjiako

cc: Clark County Councilors
Steve Stuart; Ridgefield City Manager
Claire Lust; Ridgefield Director of Community Development

Zoning

City of Ridgefield

Clark County, Washington

KEY

Zoning Designation

- Single-Family residential (R1-10, R-10, R10)
- Single-Family residential (R1-7.5, R-7.5, LDR-7.5)
- Single-Family residential (R1-6, R-6, LDR-6)
- Residential (R-12, R12)
- Residential (R-22, AR-22)
- Neighborhood commercial (NC, C1, CN, CNB)
- Community commercial (CC, C2, CCB)
- Business park (BP, OFF)
- Light industrial (IL, ML, LI, IND, LI/EC)
- Public facilities (PF, IP, UP)
- Parks/Open Space (P/OS)
- Water

City Specific

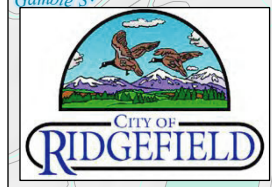
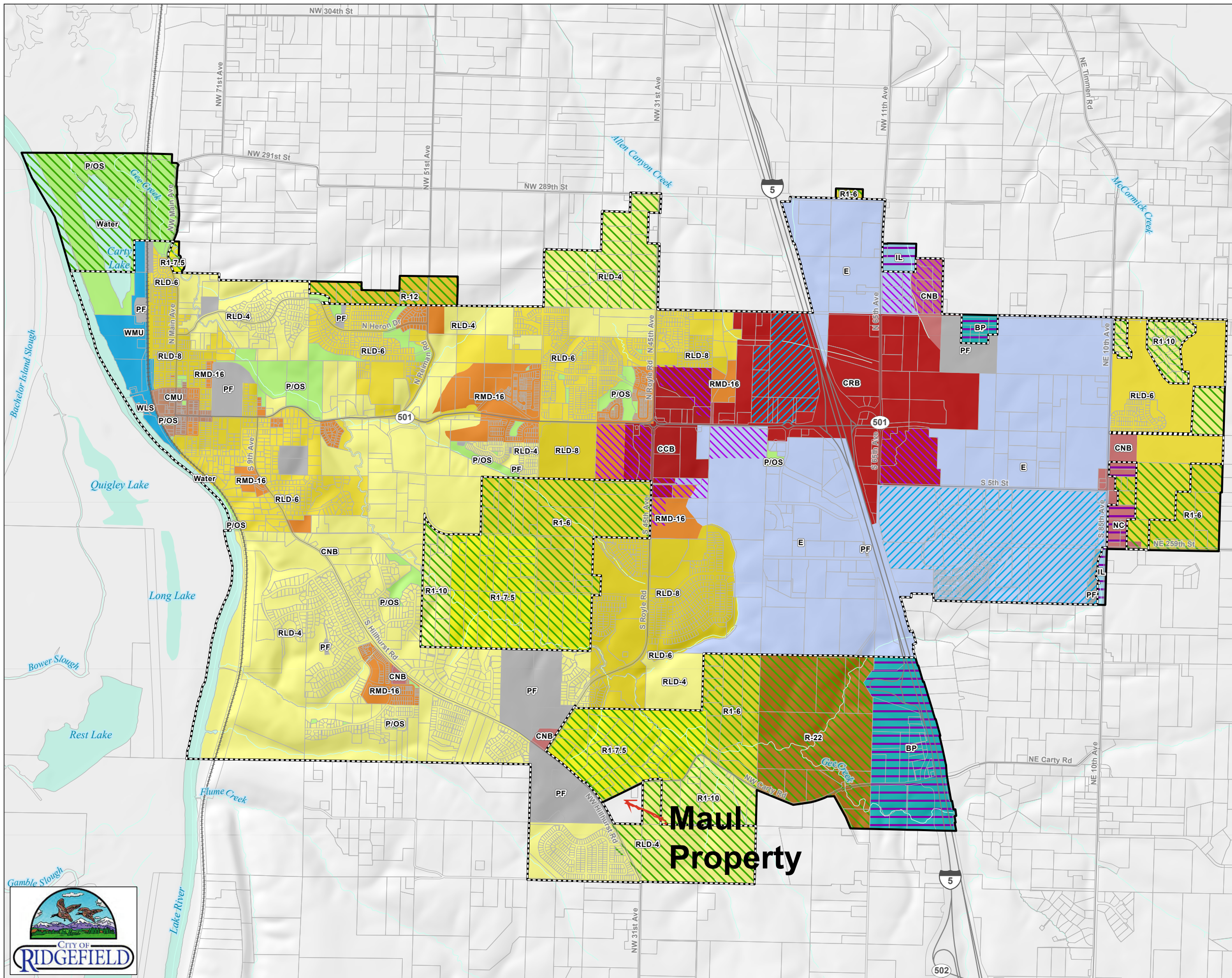
- Low density residential-4 du/ac (R-4, RLD-4)
- Low density residential-6 du/ac (R-6, RLD-6)
- Residential low density - 8 (RLD-8)
- Residential (R16, AR-16, MDR-16)
- Regional commercial (RC, CRB)
- Downtown mixed use (DMU, CMU)
- Waterfront mixed use (WX, WMU, WLS)
- Employment (E)

Zoning Overlay

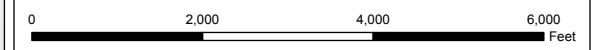
- Urban Holding - 10 (UH-10)
- Urban Holding - 20 (UH-20)
- Employment Mixed Use Overlay
- Ridgefield Mixed Use Overlay (RMUO)

All Other Features

- Taxlots
- Incorporated Area
- Urban Growth Area



NOTE: Information shown on this map was collected from several sources. Clark County accepts no responsibility for any inaccuracies that may be present.



Urban Nature of Maul Property



Looking north on Hillhurst Rd. Subdivision built up to edge of property.



Looking north from immediately adjacent large subdivision.

Urban Nature of Maul Property



Looking northwest towards Sunset Ridge, View Ridge, and Ridgefield Sports Complex across Hillhurst Road from northwest corner of property.



Looking south from school property. Property in background to left of sign.



proud past, promising future

CLARK COUNTY
WASHINGTON

COMMUNITY PLANNING

May 13, 2015

Maul Family Trust
Attn: Jim Maul
PO Box 488
Ridgefield, WA 98642

RE: Acknowledgement of request for consideration through the 2016 Comprehensive Plan Update affecting Tax Lot(s): 216491000 and 216473000

Dear Mr. Maul:

Thank you for your interest in the Clark County Planning process. We have received your letter on April 27, 2015 requesting your property be considered for inclusion to the Ridgefield Urban Growth Area (UGA) through the 2016 Comprehensive Plan Update process.

The two tax lots above were included in the Ridgefield UGA through the 2007 Comprehensive Plan update as part of area RB-2. On June 3, 2008, the Western Washington Growth Management Hearings Board (growth board) held that Clark County had failed to comply with the Growth Management Act (GMA) with some of the challenged redesignations, including the redesignation of Area RB-2. Between the time that the appeal was filed and the date that the growth board issued its decision, however, the City of Ridgefield annexed most of the Area RB-2, thereby removing it from the county and growth board jurisdiction. The properties above are portions of Area RB-2 that were not annexed.

Clark County and various other parties appealed the growth board's ruling to Clark County Superior Court. In May of 2009, Superior Court Judge Harris reversed the growth board's ruling with respect to most areas of dispute, but upheld the ruling of noncompliance in redesignating the unannexed portions of RB-2. Neither the County nor the property owner appealed the decision by Judge Harris. On December 15, 2009 the County adopted Ordinance 2009-12-15 redesignating the all of the properties in RB-2 that were not annexed back to an AG-20 designation.

Local jurisdictions are responsible for planning their urban growth areas to ensure they have sufficient land to accommodate the growth projected for the 20 year planning

horizon. The County, to date, has not received a request from the City of Ridgefield to include the two tax lots above into their urban growth area.

If you have any questions or concerns please contact Jose Alvarez, Planner III, at 360-397-2280 ext. 4898. Again, thank you for your interest in the Planning process.

Sincerely,



Oliver Orjiako, Director
Community Planning