

From: [Jeffrey Delapena](#)
To: [Ann Foster](#)
Cc: [Rebecca Messinger](#)
Subject: RE: Letter to Alicia LeDuc Montgomery
Date: Wednesday, March 25, 2026 7:55:00 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good day, Ann,

Confirming receipt of this letter and will forward to Commissioner LeDuc Montgomery.

This will also be added to the Comprehensive Plan Index of Record.

Best,



Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558



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From: Ann Foster <annfoster5093@gmail.com>
Sent: Tuesday, March 24, 2026 8:31 PM
To: Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Cc: Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>
Subject: Letter to Alicia LeDuc Montgomery

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Hello, Jeffrey and Rebecca,

We would appreciate your forwarding this letter from me and Friends of Clark County to Commissioner Montgomery.

In addition, please file in the public record.

We are grateful for all your help and support, as always.

Best,
Ann Foster, President
Friends of Clark County



Friends of Clark County

PLANTING THE SEEDS OF RESPONSIBLE GROWTH

March 23, 2026

Commissioner Alicia LeDuc Montgomery,
Planning Commission
% Jeff Delapena

RE: Work Session Entitled “Proposed Interlocal Agreement” for March 18, 2026 at 10:00 am

Via Email Only to Jeffrey Delapena at Jeffrey.Delapena@clark.wa.gov

For The Record on Comprehensive Plan Update

Dear Commissioner LeDuc-Montgomery:

As President of Friends of Clark County, I am sending this letter to you at the request of the Friends of Clark County¹ (FOCC) Board.

At the Council Work Session on 3/18/2026, you said the following:

“I just want to echo the collaboration on this piece and the excitement around finding a solution that works for a lot of different perspectives and folks in the County”

We are taking this opportunity to reiterate that FOCC does not see “collaboration” on this “piece” nor do we believe that there is any collective “excitement”. Rather, we are deeply disappointed by the determinations and proposals forwarded out of the Planning Commission that sacrifice designated agricultural lands of long-term commercial significance for the trojan horse proposal being advocated for by the cities of Camas, La Center, and most strongly, the City of Ridgefield.

To be clear, those cities’ primary goal is to have the County de-designate these Agricultural lands and allow them to be brought into the cities proposed expanded urban growth areas. We have seen little to dispute our belief that the cities will work to promote TDRs, in fact, will do nothing to promote TDR’s, and thus do nothing to promote the protection and conservation of agricultural lands, *unless* they are given their primary goal. In essence their support for something good hinges 100% on the county de-designating these lands and allowing them to be permanently within their respective UGAs. Thus as a hard stop pre-requisite to the Cities *doing anything to support TDRs*, the County *must* satisfy their primary goals of de-designation, expansion of UGAs and inclusion of the de-designated lands in those expanded UGAs. The County is literally “giving away the farm” just to start the negotiations.

¹ FOCC is a 501(c)(3) Washington State non-profit corporation that works collaboratively with community partners and policy makers to keep Clark County a beautiful and healthy place to live, work, and play. FOCC works collaboratively with community partners to improve the quality of life and economic viability of our community, for all citizens of Clark County. FOCC supports smart growth that allows for economic development in balance with protecting the area’s precious resources and community assets. Many members and supporters of FOCC are landowners and residents of Clark County. FOCC Board members, staff, supporters and regular members regularly participate in the many public processes by writing emails, letters, and providing testimony at public hearings concerning many land use and quality of life issues. FOCC has participated in each phase of the Comprehensive Plan update both with individual members and as an organization. We previously submitted comments on the scoping of the EIS and incorporated those comments in this letter for the record.

FOCC's Board is comprised of a diverse group of individuals who are steeped in a long history of advocating for sustainability of our local natural resources and critical areas (<https://friendsofclarkcounty.org/story/board/>). Specifically, 3 of our board members own and operate local farms, and 2 members are active in working to help bring our local agricultural products to local markets. Collectively our board members have decades of experience, much of it in advocating for the protection and conservation of local agricultural lands as well as building local and sustainable distribution systems for local agricultural products.

FOCC's board members unanimously, and strongly, oppose the proposals as passed by the PC and presented to the Council and we are not alone.

Just a short review of the hundreds of comments submitted to the County reveal support from groups like Friends of Central Vancouver led by Jan Kelly, the Chelatchie Prairie Coalition led by John Nanney, a large coalition of advocates representing a variety of communities of color traditionally underrepresented in our local decision-making processes including: Vancouver Metro LULAC #47026, Vietnamese Community of Clark County, NAACP Vancouver, Washington Conservation Action, Pacific Islander Community Association of Washington, Hispanic Disability Support SWWA (Pasitos Gigantes), Alliance for Community Engagement (ACE), Southwest Washington LULAC #47013NAYA Action Fund, Fourth Plain Forward and SW Washington Equity Coalition (SWEC). Other groups that support the protection and conservation of our agricultural lands include the Friends of Columbia Gorge, Friends of the East Fork, the Sierra Club and Futurewise.

Support for FOCC's position is also found among a diverse group of individuals who are working daily within our communities and whose collective mission is to promote and create a sustainable and vibrant community. Those individuals include climate advocate Don Steinke, former county commissioner Judie Stanton, food and environmental advocate Jude Wait (for example see comment # 38091936 that details AG worker employment data) and many others.

In addition, a close of read of WDFW (Washington Department of Fish and Wildlife) shows the agency's urging to reduce the conversion of our agricultural lands and priority habitat (38045323² and 36192135³)

² WDFW--Limiting conversion of natural resource lands, including working forests and farms, is a critical strategy to maintain ecological function and landscape connectivity while accommodating growth. Rural and Natural Resource Policy 3.1.1 supports maintaining rural land character outside UGAs, compatible with farming, forestry, and open space. The DEIS notes that there will be no forestland conversion, however there would be conversion of agricultural lands to UGAs under both Alternative 2 and Alternative 3. WDFW does not have comments on the Agricultural Lands Study but commends the extensive work that has been done to evaluate these resource lands. We encourage continued collaboration with farmers, conservation districts, and the community to ensure Clark County's agricultural lands remain viable and productive for the long term.

³ **Urban Growth Management:** Taking a conservative approach in planning for urban area expansion reduces impacts on wildlife habitat. A landscape scale habitat assessment can help identify areas just beyond current urban growth areas that already contain fragmented habitats or barriers to habitat connectivity, and these areas might be the best choices for future urban growth. Natural areas that have already been converted to agricultural land are preferred for UGA incorporation over natural areas or land within wildlife corridors. It should also be noted that agricultural and forest lands designated as resource lands under GMA can provide important wildlife habitat (e.g., act as winter feeding areas, wildlife movement corridors, and buffers from more intense residential development). WDFW recommends locating designated long-term forest and agricultural lands next to other large landowners (federal, state, private) whose lands are likely to remain undeveloped over the long term. By grouping relatively undeveloped parcels and "working" landscapes (i.e., farm and forest land), habitat value can increase for wildlife because this landscape more closely mimics a natural landscape.

(much of the property proposed for conversion in the Ridgefield Area is along stream corridors (Allen Canyon and McCormick Creek). It is also designated as Waterfowl and Fish stream habitat which protects habitat travel corridors. As someone who has run into agency opposition to the preservation of scarce natural resources, FOCC believes you understand the importance of letters of this type from a state agency.

Finally, the Agricultural Advisory Commission does not support the Planning Commission proposal. While the Ag Commission supports creation of a TDR program in the long-term, its recommendation to Council emphasized no de-designation during this comp plan update and a moratorium on the rural lands identified as suitable for ag designation in the Agricultural Lands Study. It recommends enacting TDR, PDR, and mitigation programs in Clark County, but is against any de-designation until a program is enacted.

Thus *none* of these groups support the proposals forwarded by the Planning Commission. To the contrary, the support for the PC's proposals, that admittedly sacrifice lands currently designated as Agricultural Lands of Long Term Commercial Significance (ALLTCS), are 1) the governments of the three cities who want to needlessly expand their urban growth areas, 2) the local building and development industry who want to develop those lands and 3) the landowners who wish to convert those agricultural lands of long term commercial significance into financial gain, along with the lawyers who represent them. Consider this: it is more than a bit of irony that the cities, landowners and developers who traditionally take the positions of converting resource lands for development are suddenly acolytes for the preservation of Ag lands and support the PC proposals, whereas those who have always been advocates for the protection and conservation of ALLTCS support a TDR program, but not at the sacrifice of hundreds of acres of existing, and designated, ALLTCS.

Over the past two decades, Ridgefield has advocated for the conversion of agricultural lands during every Comprehensive Plan update, including this one⁴. Importantly, during the last two updates, the County allowed for them to include those Agricultural lands in their urban growth boundaries and then, before any ruling by the GMHB, the City annexed hundreds of acres of those lands. Thus, when the Growth Board ultimately ruled that those lands should have remained agricultural and not been included in Ridgefield's UGA, the ruling had no effect because the lands had been annexed and the Board had no jurisdiction to invalidate the conversion of the lands and they remain in the City to this day.

In addition, based upon all those decades of work, and specific instructions by the County staff to the Cities in early 2023, the cities have full knowledge that ***if they intended to propose expansion of their UGAs, they would have to prepare a county wide study*** and present it to the County along with any proposed expansions. Ultimately, three Cities submitted proposals that included ALLTCS in their proposed expanded boundaries but failed to conduct, much less submit, a countywide study. Yet, the cities/landowners/building and development industry then collectively demanded that the County delay its comprehensive planning process to finance and conduct a county wide agricultural resource land study, which the County did at a cost of over \$200,000.

However, when the Agricultural Resource Lands Study was completed and submitted, it specifically found that the lands that the Cities wanted to include in their UGAs ***had correctly been designated ALLTCS in the original study and still met the criteria for ALLTCS***. The finding that these lands were ALLTCS meant the cities could not bring them into their respective UGAs. So, undeterred by the result of an expensive and comprehensive study that they demanded the County undertake, the cities are now

⁴ As have the Cities of La Center and Camas.

seeking to backdoor a de-designation of those lands by dangling a TDR program with an interlocal agreement (ILA) in front of the County.

*It needs to be highlighted that it was not until **after** the Agricultural Resource Lands Study was produced that any mention of any TDR program ever came from the cities.*

We want you to know that we believe that these proposals are misguided for the following reasons.:

- First, based upon years of work that have gone into this comprehensive plan update, the resolutions passed by the County, the clear statements of staff and the evidence in the record, ***there is no legal justification for expanding the growth boundaries*** of these cities advocating for expansion of their boundaries to include agricultural lands of long-term commercial significance
- Second, the entire foundation of this TDR rabbit hole that the County is plunging down ***is 100% based upon the de-designation of these lands AND their inclusion into the Cities' UGAs.*** Yet there is no legal justification for de-designating these lands based upon the County's own study. So, without de-designating lands, the entire TDR plan unravels and the County is wasting its time.
- Third, the Interlocal Agreement (ILA) is destined to fail because either a) the GMHB and the courts will reverse the expansions as unnecessary and/or find that de-designating lands after having the County's own study finding that they do not meet criteria for de-designation, or b) if the appeals fail, the land will simply be developed.

We would like to reiterate the point that last spring, when advocating for the Agricultural Resource Land study, the Ridgefield city manager told the Council that the outcome of the study was, at that time, "unknown". He suggested that the study could show that the lands should be de-designated and it might show they should not be de-designated. We did the study and found out, the lands are ALLTCS. At the March 18 work session, the same city manager stated that the ILA, which implements the TDR program would go forward ***if and only if the lands are de-designated.*** The cities wanted the study, worked hard not to do it themselves, demanded the county do the study but now they just don't like the results because it is not the outcome they desired.

As much as I, our Board members and many members of our coalition respect you and Commissioner Barca, we firmly believe you are on the wrong side of this debate and there is no excitement, only disappointment and frustration, sown on the side of those of us who have spent thousands of hours over the past 6 years helping to build a sustainable comprehensive plan that can endure and protect our local resources. Commissioner Barca has mentioned several times the need to "build trust". We suggest that one does not "build trust" by turning a blind eye to the views of so many who are the ones working the land and building the food and agricultural systems that you say you are now trying to protect by sacrificing hundreds of acres of agricultural lands on the evanescent hope, and whimsical promises, which we believe will likely never come to fruition. As is sometimes stated in the courts, we respectfully dissent.

Thank you for allowing us to comment. If it would be convenient for you, we would be more than happy to discuss this with you in person. Please feel free to reach out.

Best,

Commissioner Alicia LeDuc Montgomery
Clark County Planning Commission
March 23, 2026

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Ann Foster, President
On Behalf of Friends of Clark County
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