From:	Cnty 2025 Comp Plan
To:	"Paul Mansur"; Cnty 2025 Comp Plan
Cc:	Oliver Orjiako; Jose Alvarez; Rebecca Messinger
Subject:	RE: Strongly Opposing Urban Growth Area (UGA) Expansions and Agricultural De-designation in the Comprehensive Plan Update
Date:	Thursday, September 24, 2026 11:21:00 AM
Attachments:	image001.png image002.png image003.png image004.png

Good day, Paul,

Thank you very much for submitting comments related to the 2025 Comprehensive Plan update.

These will be added to the Comprehensive Plan Index of Record. I am including Rebecca Messinger from the Council's Office as well for awareness and to share with the Council.

Best,

Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558

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From: Paul Mansur <pmansur30@gmail.com>
Sent: Thursday, September 24, 2026 11:03 AM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Subject: Strongly Opposing Urban Growth Area (UGA) Expansions and Agricultural De-designation in the Comprehensive Plan Update

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Dear Clark County Councilors,

I am writing to urge the Council to select an alternative that includes no Urban Growth Area (UGA) expansions. Paving over prime farmland for unnecessary, sprawling development violates the Growth Management Act (GMA) and directly undermines Clark County's economic, agricultural, and climate resilience goals.

Sufficient Existing Capacity:

The county's own 2023 Vacant Buildable Lands Model and the Final Environmental Impact Statement (FEIS) explicitly state that current urban areas already possess the capacity to accommodate all projected population and employment growth for the next 20 years.

Lack of Legal and Technical Justification:

The Washington State Department of Commerce recently noted that the county has failed to provide sufficient analysis supporting expansion, failed to document how urban services would be provided to these areas, and failed to demonstrate that the targeted agricultural lands no longer meet designation criteria. The Department explicitly warned that de-designations based primarily on urban proximity are historically indefensible before the Growth Management Hearings Board.

Irreversible Loss of Vital Resource Lands:

The hundreds of acres requested for expansion by Ridgefield, La Center, Camas, and Battle Ground consist of prime agricultural lands and farmlands of statewide importance. These lands are critical for local food security, climate resiliency, and the future of our agricultural economy.

Contradiction of Climate and Advisory Goals:

Unnecessary expansion promotes urban sprawl and increases greenhouse gas emissions. To act meaningfully on the climate emergency, Clark County must adopt explicit emissions reduction goals that align with the City of Vancouver's targets. Furthermore, the Council should honor the Agricultural Advisory Commission's

recommendation to maintain all existing agricultural designations and halt the upzoning of viable farmlands.

Conclusion:

Urbanization should not be used to justify further encroaching development—a cycle the county's own legal counsel has described as "the absolute definition of urban sprawl." Residents require a sustainable balance of housing, jobs, food security, and clean water. I ask the Council to reject short-sighted municipal expansion requests, protect our designated resource lands, and adopt a responsible plan that limits growth to our existing urban boundaries. Thank you for your time, leadership, and consideration of our county's long-term future.

Sincerely,

Paul, Harmina, and Bryce Mansur

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