From:	Oliver Orjiako
To:	Jeffrey Delapena
Subject:	FW: Commerce Comment Letter Email to Clark County regarding Submittal ID: 2026-S-14100 - 14101
Date:	Thursday, September 24, 2026 3:12:13 PM
Attachments:	image007.png image008.png image009.png image010.png image011.png image012.png image013.png FEIS Ridgefield Commerce Comment Letter Responses.pdf

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FYI. Thanks.

OLIVER ORJIAKO
Director
COMMUNITY PLANNING

564.397.2280

From: Steve Stuart <Steve.Stuart@ridgefieldwa.us>
Sent: Thursday, September 24, 2026 2:39 PM
To: Claire Lust <Claire.Lust@ridgefieldwa.us>; David Toyer <david@toyerstrategic.com>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>
Cc: Janean Parker <Janean.Parker@ridgefieldwa.us>
Subject: RE: Commerce Comment Letter Email to Clark County regarding Submittal ID: 2026-S-14100 - 14101

Good afternoon Oliver and Jose,

Please see the memo we prepared to help the County address Commerce's comments specifically as they relate to Ridgefield. Let us know if there's anything else we can do to assist.

Thanks,
Steve

Steve Stuart
City Manager | City Hall

(360) 857-5020
www.ridgefieldwa.us
230 Pioneer Street | PO BOX 608 | Ridgefield, WA 98642

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From: Claire Lust <Claire.Lust@ridgefieldwa.us>
Sent: Wednesday, September 23, 2026 4:50 PM
To: Steve Stuart <Steve.Stuart@ridgefieldwa.us>; David Toyer <david@toyerstrategic.com>
Subject: FW: Commerce Comment Letter Email to Clark County regarding Submittal ID: 2026-S-14100 - 14101

Claire Lust
Community Development Director | Community Development

(360) 857-5024
www.ridgefieldwa.us
510-B Pioneer St | PO BOX 608 | Ridgefield, WA 98642

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From: Jose Alvarez <Jose.Alvarez@clark.wa.gov>
Sent: Wednesday, September 23, 2026 4:25 PM
To: Alan Peters <apeters@cityofcamas.us>; Claire Lust <Claire.Lust@ridgefieldwa.us>; Angie Merrill <amerrill@ci.lacenter.wa.us>
Cc: Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>
Subject: FW: Commerce Comment Letter Email to Clark County regarding Submittal ID: 2026-S-14100 - 14101

Hello,

Just wanted to share the final letter we received from Commerce. Please review items 1-4, this is like the previously shared draft but there have been some modifications. We still expect your response by September 24. Let us know if you have any questions.

Jose Alvarez he/him/his
Program Manager II
COMMUNITY PLANNING

564.397.4898

From: Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>
Sent: Tuesday, September 22, 2026 1:42 PM
To: Jose Alvarez <Jose.Alvarez@clark.wa.gov>
Subject: FW: Commerce Comment Letter Email to Clark County regarding Submittal ID: 2026-S-14100 - 14101

FYI.

OLIVER ORJIAKO
Director
COMMUNITY PLANNING

564.397.2280

From: Van Etten Leupold, Sarah (COM) <sarah.vanettenleupold@commerce.wa.gov>
Sent: Tuesday, September 22, 2026 1:37 PM
To: Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>
Cc: Engelbrecht, Joshua (COM) <joshua.engelbrecht@commerce.wa.gov>; Serr, Benjamin (COM) <benjamin.serr@commerce.wa.gov>; Holman, Carol (COM) <carol.holman@commerce.wa.gov>; Andersen, Dave (COM) <dave.andersen@commerce.wa.gov>; Fritzel, Anne (COM) <anne.fritzel@commerce.wa.gov>; Hodgson, Laura (COM) <laura.hodgson@commerce.wa.gov>; Brooks, Allyson (DAHP) <Allyson.Brooks@dahp.wa.gov>; Klein, Darin M. (DOC) <darin.klein@doc1.wa.gov>; Johnson, Deborah L (DOH) <deborah.johnson@doh.wa.gov>; Atkins, Emily (ECY) <eatk461@ECY.WA.GOV>; hugo.flores@dnr.wa.gov; Thompson, James (SCC) <jthompson@scc.wa.gov>; Chang, Teri <teri.chang@wsdot.wa.gov>; McLainAardal, Kelly (AGR) <kelly.mclainaardal@agr.wa.gov>; Herzog, Peter (PARKS) <Peter.Herzog@PARKS.WA.GOV>; R5 Planning (DFW) <R5.Planning@dfw.wa.gov>
Subject: Commerce Comment Letter Email to Clark County regarding Submittal ID: 2026-S-14100 - 14101

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.

Thank you for your submittal. Attached is our final comments regarding:
Proposed development regulation amendments for the 2025 GMA periodic update. Please see separate submittal for related comprehensive plan amendments for the 2025 GMA periodic update.

~~~ ONLINE TRACKING SYSTEM AVAILABLE ~~~~
Log into our new PlanView system at https://secureaccess.wa.gov/com/planview where you can keep up with this submittal status, reprint communications and update your contact information.

Don't have a user account? Reply to this email to request one and attach a completed PlanView User Request Form.

Have questions about using PlanView? Use the PlanView User Manual for assistance at https://www.commerce.wa.gov/growth-management/data-research/submitting-documents/.

Sincerely,

Joshua Engelbrecht
Growth Management Services
(360) 725-3046
~~~

THE CITY OF RIDGEFIELD
230 Pioneer Street | P.O. Box 608 | Ridgefield, WA 98642

Clark County Community Planning
1300 Franklin Street
Vancouver, WA 98660

September 24, 2026

Director Orjiako and Program Manager Alvarez:

Thank you for the opportunity to assist in responding to the final comment letter the County received from the WA Department of Commerce dated September 22, 2026. Specifically, we are addressing comments (2), (3), and (4) as they pertain to the City of Ridgefield.

Comment (2): Urban Growth Boundary Expansions

Since 2021, the City of Ridgefield has employed multiple zoning strategies aimed at increasing capacity for housing at different income levels:

- Allow accessory dwelling units, townhomes, duplexes, triplexes, and cottage housing by right in all low-density and medium-density residential zones.
- Allow upper story multifamily units in neighborhood commercial, downtown, and waterfront zones.
- Offer density bonuses for single family dwelling units under 1,600 SF, ADUs, cottages, duplexes and triplexes, and townhomes in new developments in low-density residential zones.
- On existing lots, allow duplexes to count as a half unit and triplexes to count as a third unit for density calculations.
- Allow two ADUs on residential lots.

These provisions have not yielded middle housing supply at that scale necessary to meet our requirement to serve different income bands. Since 2021:

- 263 townhomes have been constructed in medium-density residential zones; none have been constructed since 2023. Only two townhome lots have been permitted in exchange for density bonuses in low-density residential zones.
- Three duplex buildings (six units) and zero triplexes have been constructed. Only six duplex lots (twelve units) have been permitted in exchange for density bonuses in low-density residential zones.

- One ADU with a full kitchen suitable to count as a full dwelling unit has been constructed. No ADUs have been proposed for density bonuses in new subdivisions.
- No cottage housing has been constructed.
- No residential over commercial units have been constructed in the neighborhood commercial, downtown, or waterfront zones.

Where Ridgefield has seen success in getting housing affordable to different income levels built is in our mixed-use zones, where multifamily units, townhomes, and live-work units are permitted or required as part of a master-planned development. In mixed-use zones, 495 such units have been constructed, 148 are under construction or approved for construction, and 442 are under review.

An objective of the City's comprehensive plan update is to expand upon this proven success by expanding the footprint of strategically located mixed-use hubs within the UGA and assigning mixed-use zoning to limited property-owner-initiated UGA expansion areas. The capacity for housing affordable to households earning less than 80% AMI in the expansion areas is crucial to Ridgefield's ability to create mandatory capacity at those lower income levels. Per Clark County's Final Environmental Impact Statement, without the expansion areas in Land Use Alternative 2 the County's plan "would not provide enough land with multifamily zoning to meet the housing income band targets" (pg. 112). Under the zoning assumptions incorporated into the Final EIS, the expansions to Ridgefield's UGA create needed capacity for 840 housing units affordable to households earning less than 80% AMI, integrated in mixed-use environments with capacity for 370 new jobs. Since the publication of the Final EIS the City has been updating its Capital Facilities Plans to analyze and plan for service to the expansion areas over the 20-year planning horizon.

Although the County's VBLM identifies buildable lands capacity within the UGAs, it does not fully reflect the above discussed challenges the city has had in attracting and incentivizing middle housing nor does it apply realistic market factors that ensure the city has a reasonable safety factor to support forecast population, housing, and employment growth. Without the proposed UGA expansions Ridgefield would have a negligible surplus of only 6 housing units and a deficit of 182 jobs (FEIS at Tables 65 and 66).

The UGA expansions in the Preferred Alternative are necessary to address a shortfall in the amount of multifamily housing needed to meet required housing income band targets and address an employment

capacity deficit of 182 jobs. Ridgefield's UGA expansions will result in a surplus of 1,359 housing units and 188 jobs, representing a localized UGA sizing safety factor of 23% for housing and 2.3% for jobs which is needed to assure adequate housing availability for all income bands throughout the planning period. Under the Preferred Alternative Ridgefield's surpluses support a composite countywide UGA sizing safety factor of 10% for housing and 2.8% for jobs which figures are modest and consistent with those upheld for other counties.

Comment (3): De-Designation of Resource Lands

First, while it was not referenced in the Commerce comment letter, it is important to recognize the work that was done to conduct a countywide agricultural lands study required by WAC 365-190-050. Beyond the relevance to the FEIS and site-specific decisions, the City has been consistently supportive of the inquiry to truly identify and protect farming as a natural resource industry contemplated in Goal 8 of the GMA. The 2025 study contains information that – when read in full and all criteria applied to site-specific de-designation requests – can help appropriately guide these decisions in Clark County.

To address Commerce's comments regarding the de-designation analysis, it is important to reverse the order of their inquiries. In subsection (b), Commerce opines that "de-designations of agricultural lands based solely or primarily on proximity to urban growth that otherwise meet the definition of agricultural lands, historically has not been found to be defensible by the Growth Management Hearings Board."

WAC 365-190-050 states that designation as agricultural resource land relies on three factors including that the "land is not already characterized by urban growth" (WAC 365-190-050(3)(a)). To determine whether it is characterized by urban growth, the WAC specifies that Counties and Cities "use the criteria contained in WAC 365-196-310". WAC 365-196-310(1)(c) states that "urban growth area[s] may include territory that is located outside a city if such territory already is characterized by urban growth or is adjacent to territory already characterized by urban growth." The Growth Management Act further clarifies in RCW 36.70A.030(49) that ""[c]haracterized by urban growth" refers to land having urban growth located on it, or to land located in relationship to an area with urban growth on it as to be appropriate for urban growth." Finally, the Court of Appeals in Clark County WA LA GM LLC v. Western WA Growth Management Hearings Review Board (2011), ruled that under the "first prong of the Lewis County test, the statutory definition of

"urban growth" requires an assessment of the overall context of the land's relationship to the surrounding land—not just an evaluation of the land itself. See former RCW 36.70A.030(18); Lewis County, 157 Wash.2d at 502, 139 P.3d 1096."

Thus, the County must consider the relationship between properties being analyzed for de-designation and the area surrounding it. This analysis is especially important to accurately classify site-specific requests adjacent to existing City UGAs in the FEIS Preferred Alternative. Specifically, Ridgefield's expansion requests meet the test of being characterized by urban growth as follows:

- The "Maul" property is completely surrounded by the Ridgefield UGA. The Maul Property parcels were added to the Ridgefield UGA during the 2007 Clark County Comprehensive Plan Update. That decision was appealed and ultimately invalidated, but not before the City had lawfully annexed surrounding included parcels into the Ridgefield City limits in 2008. The Maul property was excluded from that annexation map as a mapping error, creating an island surrounded by incorporated urban growth.
- The "North Industrial Urban Reserve Properties" are characterized by urban growth by themselves, having been classified by the County with an "Urban Reserve" Comprehensive Plan Overlay since 1994. Under Clark County Code, this Comprehensive Plan Overlay is applied to lands "identified as being possible future additions to urban growth areas". The overlay is intended to "protect areas from premature land division and development that would preclude efficient transition to urban development". (CC Code Chapter 40.40.250.100) The Industrial Urban Reserve Overlay has remained without interruption on this property area since the overlay was first applied. In addition to the property area itself being characterized by urban growth, the area is bordered on the south, west, and east by the Ridgefield UGA and on the north by proximity to the Cowlitz Tribal Nation Initial Reservation.

If it is determined that further analysis is necessary beyond the recognition of Ridgefield's site-specific requests being improperly zoned as Ag because they are characterized by urban growth, we move to answer subsection (a) of the Commerce comment letter. There are a number of essential criteria under WAC 365-190-050(3)(c) that can also help evaluate lands for long-term commercial significance for agricultural production. These include:

a. (c)(ii) The availability of public facilities;
b. (c)(iv) The availability of public services;
c. (c)(v) Relationship or proximity to urban growth areas;
d. (c)(vii) Land use settlement patterns and their compatibility with agricultural practices;
e. (c)(viii) Intensity of nearby land uses; and
f. (c)(ix) History of land development permits issued nearby.

1) For the "Maul" property:
   a. It is adjacent to urban services including water, sewer, traffic, and schools. (WAC 365-190-050(3)(c) (ii) and (iv));
   b. The property is not enrolled under the current use tax assessment in RCW 84.34 (WAC 365-190-050(3)(c)(iii)); and
   c. The history of adjacent land development, intensity of nearby urban uses and their incompatibility with agricultural practices, and proximity on all sides to the Ridgefield urban growth area are all changed circumstances that warrant approval of the property owner's request to change from Ag Resource to Ridgefield UGA. (WAC 365-190-050(3)(c)(v), (vi), (vii), (viii) and (ix)).
2) For the "North Industrial Urban Reserve" properties:
   a. The property is adjacent to urban services including water, sewer, and traffic infrastructure. (WAC 365-190-050 (3)(c) (ii) and (iv)); and
   b. The history of adjacent land development, intensity of nearby urban uses and their incompatibility with agricultural practices, and proximity on all sides to the Ridgefield urban growth area and Cowlitz Tribal Nation are all changed circumstances that warrant approval of the property owner's request to change from Ag Resource to Ridgefield UGA. (WAC 365-190-050(3)(c)(v), (vi), (vii), (viii) and (ix)).
   c. Additional information has been submitted into the record by the City and property owners including a report from Johnson Economics, LLC, dated October 2024.

<u>Comment (4): Transfer of Development Rights (TDR) Program</u>

THE CITY OF RIDGEFIELD
230 Pioneer Street | P.O. Box 608 | Ridgefield, WA 98642

Our response to Commerce's comments regarding a TDR Program were sent to Clark County on September 23 by David Toyer, who represents the City of Ridgefield in these matters.

Thank you once again for the opportunity to assist in addressing the comment letter you received from the WA Department of Commerce. Please let us know if there is any further information we can provide.

Sincerely,



Steve Stuart, Ridgefield City Manager

CC: Claire Lust, Ridgefield Community Development Director
Janean Parker, Ridgefield City Attorney
David Toyer, Toyer Strategic Advisors