From:	Oliver Orjiako
To:	Jose Alvarez
Cc:	Jeffrey Delapena
Subject:	FW: Comp Plan hearing comment 10-1
Date:	Thursday, October 1, 2026 8:17:06 AM
Attachments:	Public Hearing Comment 10-1.pdf image001.png image002.png image003.png image004.png

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FYI. Thanks.

OLIVER ORJIAKO
Director
COMMUNITY PLANNING

564.397.2280

From: tonya.enger@proton.me <tonya.enger@proton.me>
Sent: Wednesday, September 30, 2026 11:04 PM
To: 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>; Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>
Subject: Comp Plan hearing comment 10-1

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Councilors and staff,
Please add my attached letter to the record for the October 1 hearing on the comprehensive plan update. I hope you will read it.

Thank you,
Tonya Enger
District 1

Sent with Proton Mail secure email.

September 30, 2026

Councilors,

I thank the council for considering the many factors that impact the choice of a preferred comp plan alternative. I recognize that this is no simple or easy task. In fact, choosing a preferred alternative may be one of the biggest decisions that our county faces in light of unprecedented times and an uncertain future. I am appealing to the council to choose the no-change alternative for the comprehensive plan.

Balancing the needs, and preferences of the cities in this county, with the responsibility of the county to our shared resources and common future is not something to take lightly. It is apparent that the majority on council would prefer to align with the requests of cities who are experiencing rapid growth, as the county at large will be experiencing rapid continued growth in the near future. The argument for PA-2 would allow for these cities to be in charge of their urban growth by allowing de-designation of agricultural land identified for a higher identified use to support housing and all requisite growth needs. It is also at the recommendation of the planning commission. Trying to satisfy the requests of the cities while budgeting for responsive growth is a respectable aim in your tough position as council. However, I remind you of several reasons why choosing PA-2 is the wrong choice :

- **PA-2 is ill-advised and unfounded by verified fact, authority, and council-led study findings.** The growth management hearing board has repeatedly invalidated the de-designation of agricultural land. The county's own land study has invalidated the need of converting farmland to accommodate growth. Recently, the state department of commerce has also invalidated the need to de-designate agricultural land under the premise of supporting growth. All of these bodies of evidence have demonstrated legitimate refutation to the claim that PA-2 is necessary for the stated reasons for its preference. Why then, do you continue to ignore this authoritative evidence and findings of your own staff, in favor of contentious appeals towards expansion of development?
    - This study which provides evidence against the stated reasons for choosing PA-2 has cost the council to delay comp plan adoption and has put the county in non-compliance which jeopardizes state grant eligibility. To ignore its findings would be doubly irresponsible to state compliance standing.
- **Keeping all designated agricultural land is a priority for the future common good of the county.**
    - 96% of designated ag land is considered prime farm land.
    - Agricultural land provides many other benefits to the county including providing habitat land for migrating birds and wildlife, protecting water quality, reducing stormwater and runoff, preventing flooding and replenishing groundwater recharge, carbon storage and climate mitigation, pollinator habitat, biodiversity, preserving the cultural heritage and regional identity through landscape integrity, reduced urban heat, ecosystem protection, among others.

    - It is extremely concerning to me, that our county which is home to numerous stopover migratory birds, unique ecosystems, agricultural cultural heritage and an expansive and scenic landscape is changing too fast and without serious consideration of the irreversible consequences. In light of climate change, I am even more concerned about the effects rapid expansion and loss of our irreplaceable farmlands will have on regional livability.
    - There has already been a surge in new residents to the county - people who have no idea of what they are losing before they even get a chance to learn about it. Our ecosystems, landscapes, access to wildlife and nature, and future environmental security is all being compromised by the short term goals of building as much as possible in a short amount of time. We should be celebrating, improving, and cherishing our county's natural assets, not depleting them recklessly. PA-2 further compromises the qualities of our county that make it so desirable of a destination in the first place.
- **PA-2 is not necessary to prevent sprawl and accommodate growth.** In fact, it will only make sprawl and low density development more likely, which is the complete opposite of what we as a county should be doing to meet climate change goals. Some may say that farm land is already being converted to subdivisions and that PA-2 won't make any difference - which is technically true to an extent - but to that I say that is an excellent case for why the council should be doing more to protect our prime farm land -
    - I call on the council to pursue a Public Benefit Rating System, so that there are non-market solutions to allow the valuation of this land to compete with its value for short term development.
- **Over a dozen community organizations active in the county have voiced concern over the council's preference for PA-2 and have appealed to keep the no change alternative.** Many individual residents have spent their precious free time and energy to voice concern as well. Continuing to disregard the public for which you appeal to in election seasons, and the organizations that do so much work to support our county, is a slap in the face and a disavowal to your commitment to responsible leadership - especially in these unprecedented times.
- **The logic behind allowing cities to dictate their urban growth through PA-2 is circular and perpetuates previous shaky grounds for pursuing rapid urban development.** PA-2 would repeat the irresponsible 2016 urban expansion rulings for Ridgefield, which again went against official recommendations and findings. Now, Ridgefield is using the already expanded urban growth to justify the conversion of more farm land. This suggests that the recommendations and preferences for PA-2 are biased towards unjustified development. As council, it would be more responsible and prudent to side with authoritative data than continue enabling misguided and hasty plans for development under the guise of accommodating growth. There is nothing conservative or wise about enabling a short-sided cash grab via converting land that once converted cannot be returned to its present state and value.
- **The argument for PA-2 to accommodate growth is also undermined by all recent subdivision development in the relevant cities in recent years.**

- Most housing built in the cities asking for PA-2 is qualified as low density housing. This betrays the sense of urgency for these cities (Ridgefield, La Center, and Battleground) to accommodate growth and goes against necessary density goals to help the county meet climate change and livability goals. There is nothing sustainable or responsible to ask for more land for housing when most housing allowed up to the time of asking has been low density. If housing and growth accommodation had been a real motivation for these cities then they would have done more to prevent unnecessary low density housing, when medium to high density would be more appropriate.
- When our population doubles and climate change exacerbates heat and stress on our ecosystems, all of the recent single family/three car garage developments will look extremely irresponsible. This is what these cities have chosen to allow before asking for more land in urgency, when they could have followed the data that says they could have developed their precious land differently.

I could go on, but the council had heard repeatedly from numerous groups and bodies about why the PA-2 is near-sighted and misguided. If you still remain skeptical, then it stands to reason that facts may not be your guiding motive for choosing this preferred alternative. Bottom line: facts do not support PA-2 for the reasons council has chosen it; facts DO support that there is ample room and opportunity to achieve growth accommodation under the no change alternative. **If the council seeks to serve the public, represent the people, and be conservative, responsible leaders at a time of imminent climate change, then do right by the facts, and the people, and keep the no-change alternative.**

Sincerely,
Tonya Enger
District 1