

**From:** [Oliver Orjiako](#)  
**To:** [PETER BRACCHI](#)  
**Cc:** [Sonja Wiser](#)  
**Subject:** RE: Problems with meeting growth management act  
**Date:** Wednesday, January 18, 2023 9:00:49 AM

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Good morning Peter:

Thank you for your email and the attached document. The document will be included in our comp plan index. Please, kindly share your email and document with the City of Vancouver staff. Thank you.

Best,

Oliver

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**From:** PETER BRACCHI <peterbracchi@aol.com>  
**Sent:** Wednesday, January 18, 2023 6:52 AM  
**To:** Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>  
**Subject:** Problems with meeting growth management act

CAUTION: 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.

Planning in Clark County for growth management and compliance with the growth management act for land-use is complicated by the local neighboring community of the city of Vancouver not abiding by growth management act land-use policies along Burnt Bridge Creek.

The pollution and environmental destruction by people building and living on land designated non-buildable by the Growth Management Act along Burnt Bridge Creek in Vancouver over the last 5 years has led to the Loss of the Recreational Use of Vancouver Lake at times due to excessive Fecal Coliform Bacterial and other environmental pollutants.

For successful implementation of the GMA for the growth of Land for Housing, Business and Recreation, Clark county needs the City of Vancouver to become a compliant Partner of the GMA regulations along Burnt Bridge Creek.

To successfully meet the requirements of the GMA Clark County and the City of Vancouver need to consider a County wide planning for the GMA, Shoreline Management, the Protection of Critical Care Areas/Recreational land.

Please review the attached document which addresses the why the city of Vancouver is not meeting requirements of the GMA along Burnt Bridge Creek.

We cannot succeed as Clark County meeting our growth management goals without compliance from the city of Vancouver.

Please consider county wide Planning.

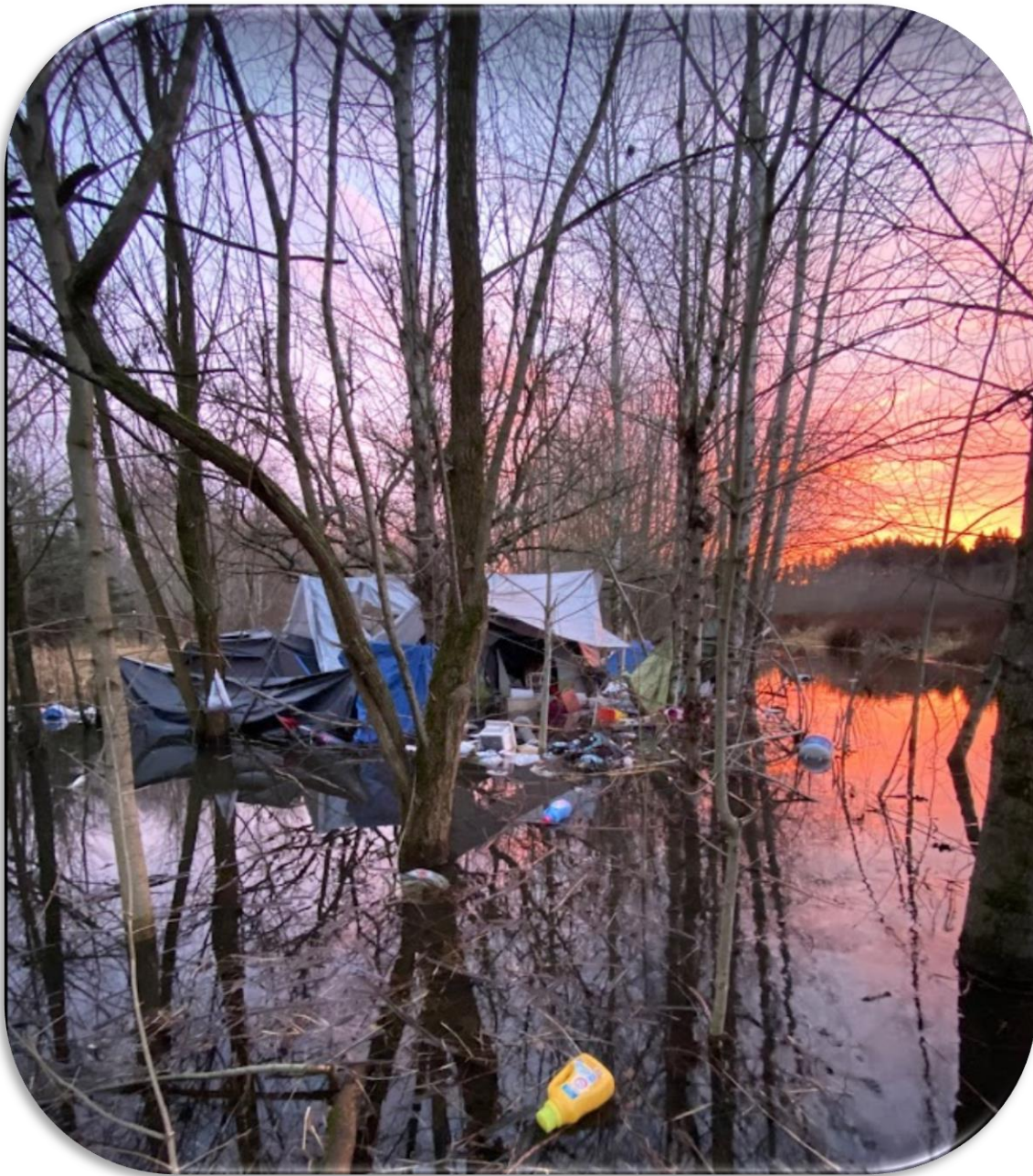
Thanks Peter

Thanks Peter

**Peter Bracchi**  
[peterbracchi@aol.com](mailto:peterbracchi@aol.com)  
June 1, 2022

**Request**

We have a need for a land restoration and water pollution mitigation Plan for the Burnt Bridge Creek Watershed Critical Area.



*This document is designed to be viewed Electronically - Titles and Pictures contain Hyperlinks*

## Environmental Summary

Burnt Bridge is a regulated waterway it does not meet the Washington Department of Ecology standards for fecal coliform bacteria, temperature, acidity, and levels of dissolved oxygen. By not meeting the state standards, it has placed Burnt Bridge Creek on the federal 303(d) list of water quality impaired waterbodies.

The City is failing to bring Burnt Bridge Creek into compliance with state water quality standards.

Along the BBC trail most of the Land in the Critical Area belongs to the City of Vancouver and designated for Recreation. Land Zoning is *Park, Open Space, Greenway, or Lettuce Field*.

**The quality of Stream water is related to Land Use Quality and Pollution.**

### What are Critical Areas

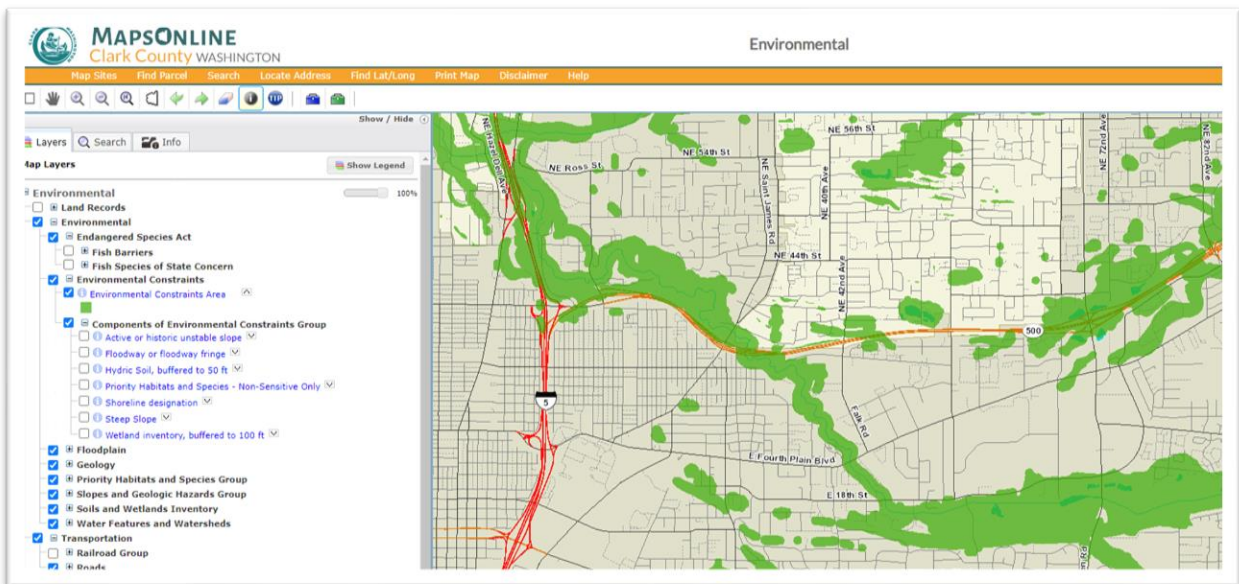
The Growth Management Act (GMA) requires all cities and counties in Washington to adopt regulations protecting “critical areas” in order to preserve the natural environment, wildlife habitats, and sources of fresh drinking water.

Protecting critical areas also helps reduce exposure to risks, such as landslides or flooding, and maintains the natural elements of our landscape. It can be costly, or even impossible, to replace critical area functions and values once they are lost.

**RCW 36.70A.030(5) defines five types of critical areas:**

- 1) Wetlands
- 2) Frequently flooded areas
- 3) Geologically hazardous areas
- 4) Fish and wildlife habitat conservation areas
- 5) Areas with a critical recharging effect on aquifers used for potable water

### Environmental Constraints layer – summary of Items 1-4



## Problem Description

The City of Vancouver Failed to perform a **SEPA** study when [Camping Laws](#) were initiated or update. The City has, and still allows camping within the Critical Area.

The [State Environmental Policy Act](#) (SEPA) process identifies and analyzes environmental impacts associated with governmental decisions. These decisions may be related to issuing permits for private projects, constructing public facilities, or adopting regulations, policies, and plans. The SEPA review process helps agency decision-makers, applicants, and the public understand how the entire proposal will affect the environment

By the City failing to perform the required SEPA Study, the result has been Environmental Destruction to the Critical Area with additional Fecal Matter and Water Pollution to the existing 303(d) list stream.

Potentially Harmful Materials from continuous habitation and Fires been a contributing problem. Stream shade has been reduced by the Cutting of Trees. Silting has Increased due to digging, vegetation removal, Tree cutting and habitation on steep slopes.

Critical Area land has had residential occupation for the last 6 years. The land has had the ground cover removed and trees cut down to establish cleared living areas. The result has been years of Environment Devastation, water pollution and increased devastation caused by Fires, and Water Pollution.

The City is failing to meet it Commitment to Clean Water

The City is failing to meet its Commitment to “Not Net Loss” to Critical Areas

The City is failing to enforce it own City Codes for Environmental Protection

15.04	Park Code
15.04.040	Removal or Destruction of Park Property
15.04.100	Depositing Litter
15.04.110	Fires
15.04.150	Closing Hours--Unlawful Entry
8.22	Camping
8.22.040	Unlawful Camping
8.22.050	Unlawful Storage of Personal Property in Public Places
14.26	Water Resources Protection
14.26.115	Prohibits “Municipal Waste Disposal Sites”
14.26.117	Discharges to Water Resources. “Potentially Harmful Materials”
20.740	Critical Areas Protection
20.740.020	General Provisions - No Net Loss of Functions
20.760	Shoreline Management Area

## 6 Years of Environmental Destruction & Water Pollution to BBC

[Shoreline Destruction and Pollution - East Side](#)



[Shoreline Destruction and Pollution West Side](#)



**Frequently Flooded Areas**

*Bicycle Chop shop Camp. ground compacted, trees cut and Water Pollution*



**Clark County Geographic Information Services - Environmental Constraints Layer Flood Plain**

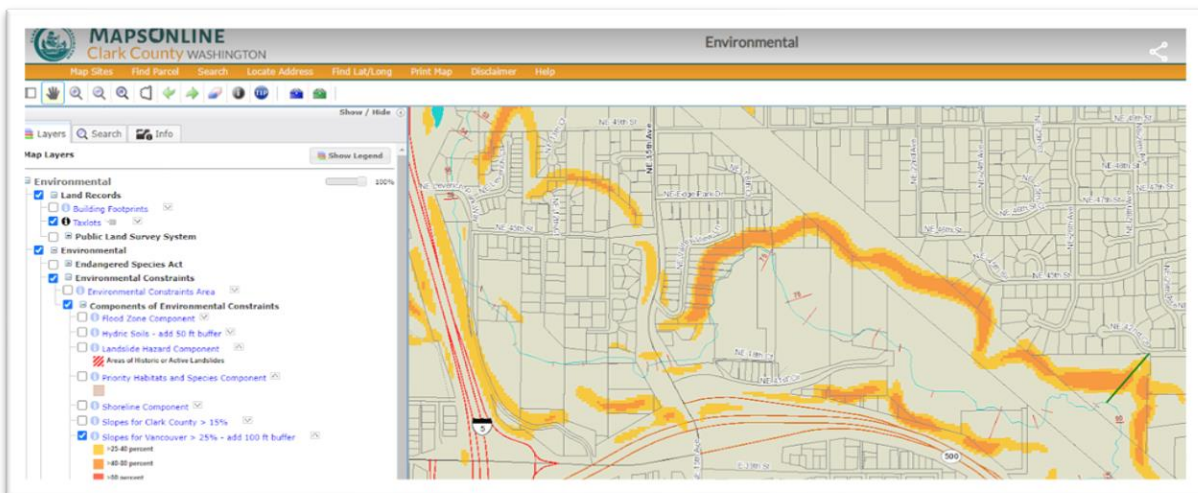


## Geologic Hazard Areas 6 Years of Environmental Destruction

Removal of Vegetation causes Erosion on Steep slopes, silting into creek



## Steep Slopes 40%-80% along Burt Bridge Creek



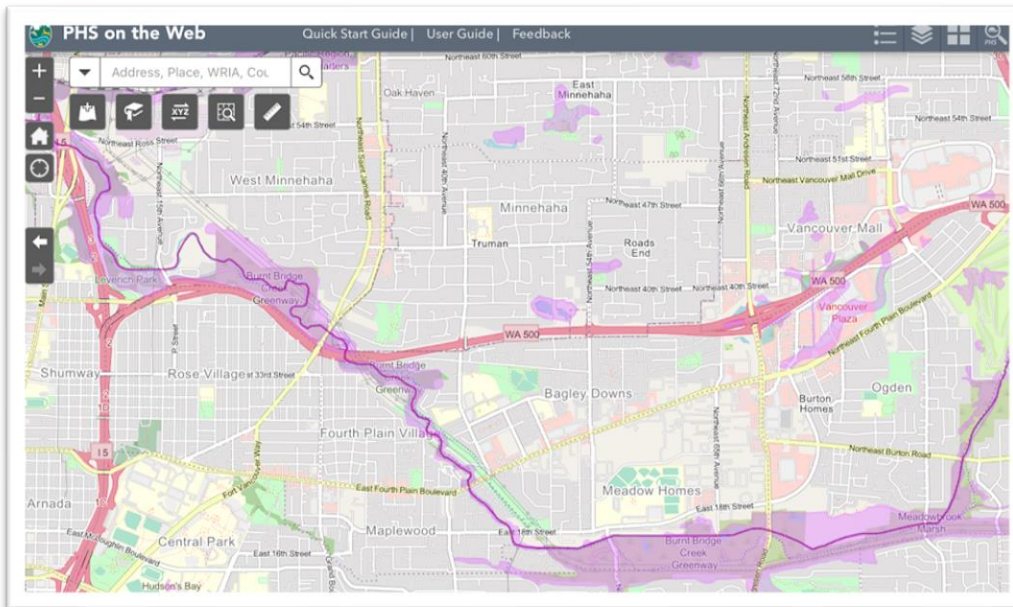


[Priority habitat conservation areas over 6 years of Destruction](#)

*Priority Habitat Species Area*



[Map to Priority Habitat Species Area](#)

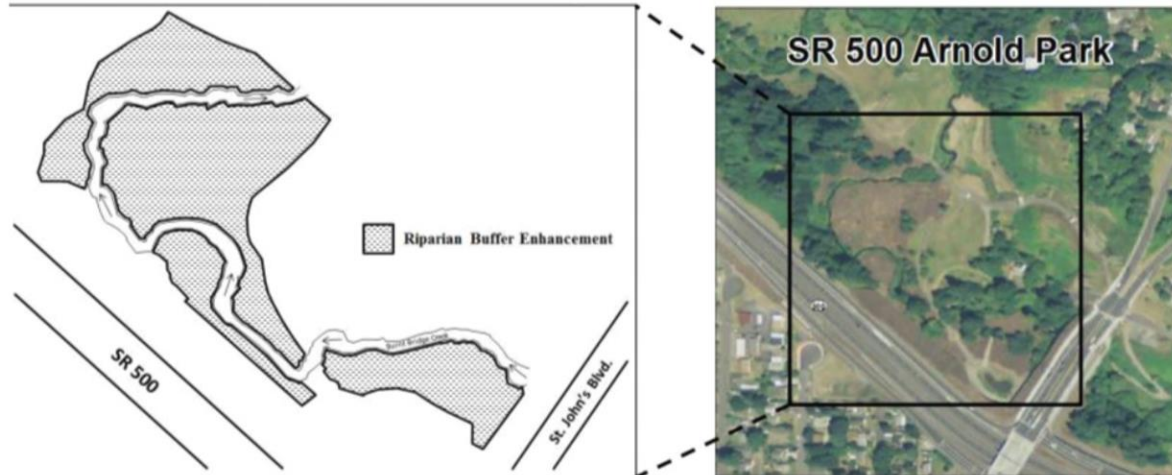


### [Arnold Park-Mitigation continuous destruction over 6 years](#)

USACE NWP (23) NWS-2009-1104 - Southwest Region Wetlands Program

#### **What is the 500 Arnold Park Mitigation Site?**

This 4.42-acre mitigation site (Figure 1) is located along Burnt Bridge Creek west of St. John's Boulevard, north of SR 500, and entirely within Arnold Park. This site was created as partial compensation for impacts to 4.30 acres of disturbed riparian buffer due to mobility and safety improvements within the vicinity of the SR 500 and St. John's Boulevard interchange. The riparian enhancement area is located adjacent to and within the overall project boundaries, and shares the same watershed characteristics as the impacted areas. The site is designed to provide mitigation for lost wetland functions and is anticipated to provide stream shading, flood flow attenuation, water quality, and general habitat functions.



### [Meadowbrook Marsh Park Destruction and Pollution](#)

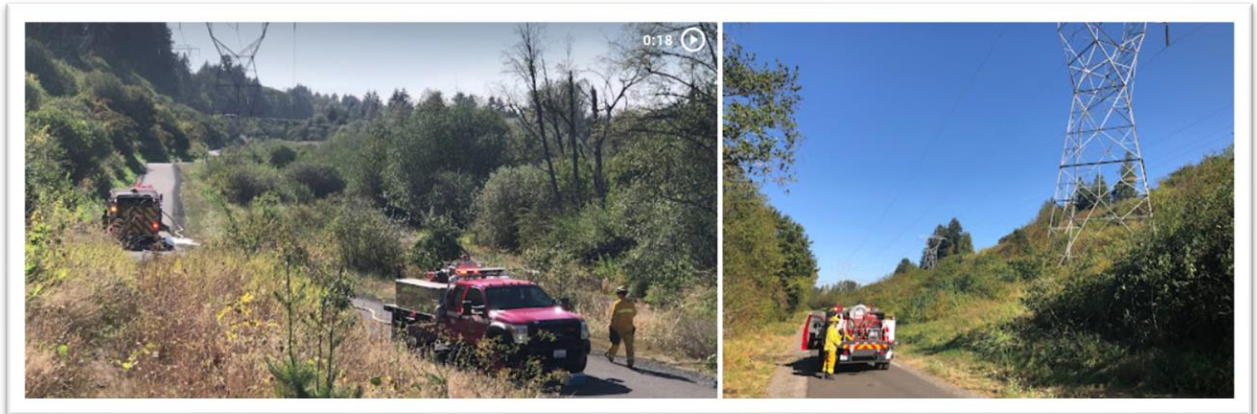


Continous Habitat lissues with FIREs over 6 years

[Fire in Anrold Park Mitigation Site](#)

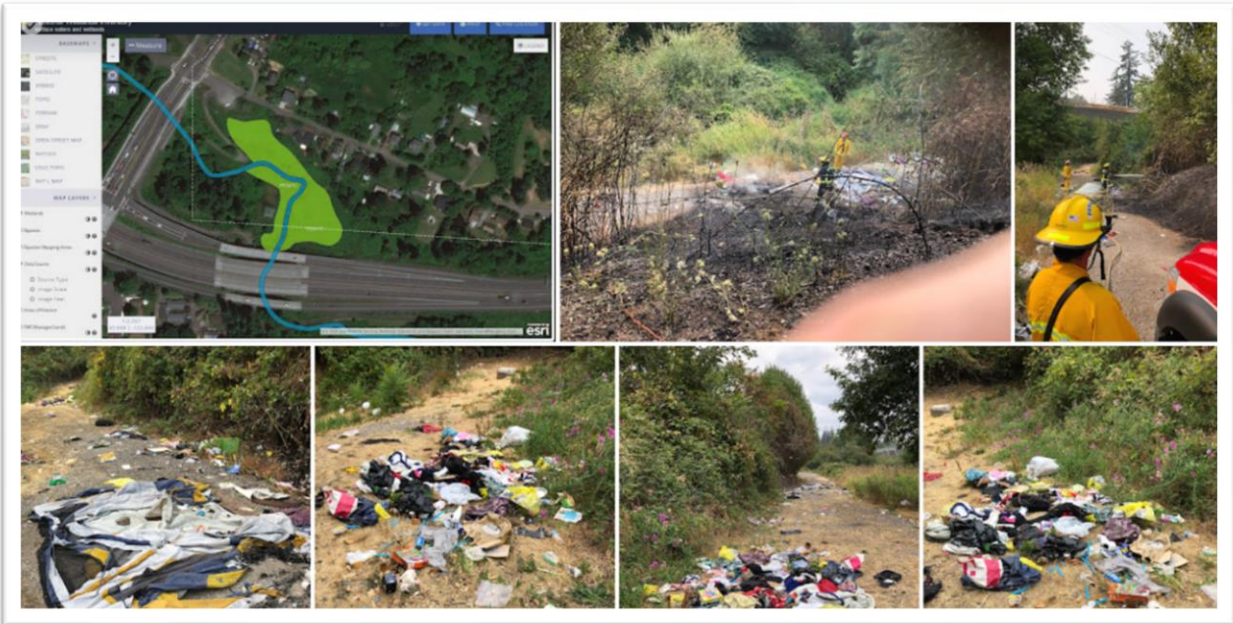


[Fire in Riparian Area](#)



Continous Habitat Problems with FIREs over 6 years (continued)

SR500 Wetlands Fire - Riparian area



SR500 Wetland Fire Riparian Area & Steep Slopes



## Pollution from Potentially Harmful Materials Into BBC over 6 years

### [Chapter 14.26 WATER RESOURCES PROTECTION](#)

“Potentially Harmful Materials” means hazardous materials as defined at VMC Section 14.26.110 as well as other materials including, but not limited to, the following which, if discharged or improperly disposed, may present a risk to water resources:

Petroleum products including but not limited to petroleum fuel and petroleum-based coating and preserving materials; oils containing PCBs; antifreeze and other liquid automotive products; metals, either in particulate or dissolved form, in concentrations above established regulatory standards; flammable or explosive materials; radioactive material; used batteries; corrosives, acids, alkalis or bases; paints, stains, resins, lacquers or varnishes; degreasers; solvents; construction materials; drain cleaners and other toxic liquid household products; pesticides, herbicides, fungicides or fertilizers unless applied in accordance with local, state and federal standards; steam cleaning and carpet cleaning wastes; pressure cleaning wastes; car wash water; laundry wastewater; soaps, detergents, ammonia; swimming pool backwash; chlorine, bromine, and other disinfectants; heated water; domestic animal wastes; sewage; recreational vehicle waste; animal carcasses, excluding salmonids; food wastes; collected lawn clippings, leaves or branches; trash or debris; silt, sediment or gravel; dyes; and untreated or unapproved wastewater from industrial processes

### [Potentially Harmful Material Pollution in Critical Area](#)



**Additional Fecal Matter pollution over 6 Years**

Continuous habitation has contributed additional Fecal Matter into the problem 303(d) Creek that already has problem with Fecal Coliform Bacteria. *(no links to additional pictures provided)*

