

From: [Jeffrey Delapena](#)
To: [Peter L. Fels](#)
Cc: [Cnty 2025 Comp Plan](#); [Jose Alvarez](#); [Oliver Orjiako](#); [Jenna Kay](#)
Subject: RE: 2025 Update EIS scoping
Date: Monday, June 3, 2024 3:06:24 PM

Good day Peter,

Thank you for your comments regarding the 2025 EIS Update. I have forwarded them to staff and will add your comments to the Index of Record.

From: Peter L. Fels <plfels@gmail.com>
Sent: Monday, June 3, 2024 3:03 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Subject: 2025 Update EIS scoping

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RE: EIS Update

Councilors:

The foremost issue in today's world is how to avoid major climate change. Recent amendments to the GMA require you to consider climate impacts as part of your updates to the Growth Management Plan.

Climate change is caused by human activities which have increased greenhouse gases (GHGs) since the start of the industrial era. Therefore, *the primary scope of the EIS should be to determine what effect each part of the plan will have on GHG emissions.*

To consider GHGs, you must first determine what the baseline – i.e., current emissions level -- is. The EIS should then determine how much any proposed action will reduce (or increase) GHG emissions.

The State has set goals for overall GHG reductions. Clark County should do its share to meet or exceed those goals in each area of the plan.

In addition, the EIS should consider plan impacts on overburdened communities. For example, many parts of the county have unhealthy air quality year around. Future developments should avoid adding to, and be planned to reduce, air pollution in those areas.

I believe that most residents/citizens of the County want to maintain (or even improve) its livability. We appreciate the rural environment, water and forest resources, open space and access to urban amenities. The EIS should consider how to best maintain those qualities.

Another question is how to adapt to expected environmental degradation. The primary answer is to avoid increasing that degradation (by reducing GHG emissions). The second answer is to build redundant services and infrastructure and to build and even “overbuild” with consideration of potential disasters (earthquakes, floods, heat domes, wildfire smoke and electrical and transportation outages) and consideration for underserved and overburdened people in our community.

How can we plan for expected growth? We should not plan for heavy industry or extraction of natural resources (rock, gravel, timber, water, etc.) because doing so degrades the environment and quality of life. Expansion of the industrial area around the Clark County rail line will foolishly cause increased emissions, destroy natural landscapes and generally harm the quality of life the citizens now enjoy. Industry and housing should be confined to current Urban Growth Areas.

I believe the path to maintain our urban and rural characters is to focus most of the growth within current UGAs and to develop value-added agriculture, including vineyards, wineries, hops, distilleries and agritourism, as a principal industry for the county. Clark County has valuable soils that can be used for high quality agricultural products and should not be paved over for industry, retail or commercial purposes.

You have received a number of community comments asking to preserve and enhance equine related activities of rural landowners. This can be consistent with preserving our livability, but should not mean allowing more small acreage horse properties at the expense of vineyards, orchards, and specialized crops or adding additional single family houses to the rural environment. The EIS should also consider the methane emissions of equine, bovine, and other animal husbandry.

You also have received comments asking for expanded housing in rural areas. However, overbuilding housing away from city centers adds to VMTs, reduces available good soils, forests and water quality, and eventually will result in places like those people wanted to move away from in the first place.

The one exception to restricting housing and commercial development to current UGAs is the potential for transit oriented developments. We need to improve public transit systems to allow people to get out of single occupancy vehicles and reduce VMTs. It may be appropriate to allow small village type communities along transit lines in locations between existing urban areas. You should also consider developing the Clark County rail line for transit, bike and foot travel, with small mixed use stops along the way. These steps would create some new jobs and housing, eliminate the need for local residents to travel longer distances to shop (or allow people to use public transit to travel between towns), and create places for value-added agricultural products to be sold, while reducing the impact on other rural areas. Such small community centers may also be places to locate emergency vehicles, charging stations, temporary shelter space, communication centers, community solar installations and similar resiliency services and measures.

In summary, the EIS should review (and measure) all planned growth and development for its impact on the climate and on overburdened people. Priorities in the revised Growth Management Plan should then focus on those actions which will result in the greatest emissions reductions.

Over the almost 30 years I have lived in Clark County, I have seen the demise of forests, dairy farms, open space, water quality, salmon runs and air quality. I value those things and hope

they will be available for future generations. The purpose of the GMA is to plan for the future. I hope you will take steps in the GMA revision to protect the future for all of our citizens.

Sincerely,

Peter Fels