From:	Jeffrey Delapena
To:	Cnty 2025 Comp Plan
Cc:	Oliver Orjiako; Jose Alvarez; Jenna Kay
Subject:	RE: Comprehensive Plan Update Comments
Date:	Wednesday, June 5, 2024 8:27:58 AM

Forwarding anonymous comment to staff. This will be added to the Index of Record.

From: Clark County <webteam@clark.wa.gov>
Sent: Tuesday, June 4, 2024 5:32 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Subject: Comprehensive Plan Update Comments

Submitted on Tue, 06/04/2024 - 5:32 PM

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Message Subject
Comprehensive Plan Update Comments: State Environmental Policy Act Determination of Significance and Request for Comments on Scope of Environmental Impact Statement

Comments
My discussion below applies to the unincorporated Clark County, with the vast majority, if not all, but also including 'Cluster Development'-like, parcel lots. Urban area's parcel lots can also apply similar mitigating strategies with different/smaller dimensional numbers. Housing development designs with setbacks, water quality, habitat, climate change resiliency and fire risk mitigation are all inextricably linked. The following suggestions are yes, all about dedicating 'Space' for competing needs but the mitigating 'cost' will be equitably less for smaller roofs (e.g. 2-story/multi-dwelling; 2 car vs. 3 car attached garages; and with attached less than detached

garages/units etc.). And yes, this too would yield less overall community cost for a broader, cleaner, and more fire resilient, vibrant watershed.

Groundwater quality, increased/preserved/maintained habitat and its 'close' proximity to people increases civic, personal participation, appreciated value and willing responsibility because one will SEE it and be less detached from it, as is usually the case. 'Developments' typically send much run-off away to 'one place', e.g. a 'fenced' hole in the ground, where water maybe returned to the water table but how 'filtered' is that water through that quite small land surface area? This generates no/low habitat, no cooler temperature preservation and with both questionable water quality and 'uphill' watershed retention capability. Other 'necessary' Storm Water management strategies send the water far away, like through 'ditches' before entering 'the' watershed management area all costing huge sums [public 'improvement' projects post 'developments'] as larger volumes of run-off are pushed there because 'development' has imposed it.

All below are measurable and are rarely refutable, and tangibly quantifiable and equitable:

The following could/should encourage/help significant handling of storm water run-off, create green corridors for small yet significant habitats [especially when using or preserving existing native plantings*]; with 'layered' vegetation techniques provide some shade and privacy for cooling land and home, and permit 'earlier, uphill' water table/aquifer recharging and longer soil moisture retention and a 'downstream' cooler watershed extension especially throughout our longer, hotter dry seasons AND provide some Flood mitigation in bigger/longer rain events. And when/if neighboring properties are directly adjacent in their application of these 'form follows function' strategies this can improve the successes of 'sustainable', even connected, less fragmented habitats with improved fire resistance capability.

Almost everyone's dwellings are uphill from someone else especially within their respective watersheds. Setbacks can provide clean/cleaner water and habitat management possibilities.

OK. Let's make those measurements. Residential dwellings already have front/back and side setbacks. Enforce Setbacks** at front and sides and back of lots for all sheds/out buildings. Existing side setbacks are 10'(?) for all non-dwelling structures and are perhaps more important than other setbacks since they keenly apply to typical 'neighborhoods' created by 'developers' who are motivated to squeeze as many as possible geometrically narrower lots onto the shortest, linear private road, invariably bringing all structures closer to each other [and yet still with the necessity of 'tapering' the landscape away/downhill from the respective main structures to preserve their integrity]. Now this may reduce private road and lot cost and generate perceived less road run-off (However, natural uphill roadside collection of water [e.g. ditches] does present also a different, necessary mitigation, but this already should be separately considered in the 'Planning' of that small community).

It is imperative that these 'side setbacks' can/should be applied to all existing and new sheds/buildings and to even, less than soil pervious, 'lanes' sometimes owners generate. These

structures and ‘lanes’ are not ‘living’ tissue and cannot compete with living plants in water moisture content and retention even in the Fire season [plants being more managed especially when they are closer in direct lines of sight to houses/buildings]. Unfortunately, out-buildings, sheds and detached garages also typically contain some form of potent ‘fuel’ storage for the residents’ motorized equipment. In contrast, these natural [native*] managed living things, better than any building and its contents, would provide some more climate resiliency and wildfire resistance, too.

Ok. Here’s the math skinny. Measure the total amount of all the square footage of all impervious surfaces including the land area that all buildings displace in one dimension (steeper roofs do not add more water) and impervious asphalt driveways [can also be accommodated/factored e.g. for a ‘gravel’ driveway with an engineering ratio e.g. 0.70 or some <1.0, the factor of asphalt.]. Add up all the non-pervious surface area ‘equivalents’ and then apply a multiplication factor of 2 or greater since before these man-made impervious surfaces were in existence the land surface areas they now occupy were, in the past, available for natural water management (=factor of 1). Dedicate this new, easily calculated square footage for storm water/rain watershed management using native vegetation additions (they can handle our Northwest climate/soil variations). By example: So even the minimum 1-acre lot with a 2,500sf house land displacement footprint, a 3 car attached garage using 2,500sf asphalt/concrete driveway, and a 200sf shed would have 5,200sfx2= 10,400sf dedicated for water management (e.g. ‘Rain garden’), less than 24% of 1 acre lot [sf=43,560sf].

All roof run-off and non-pervious equivalent surfaces will have a minimum distance from the neighboring lot (and the lot owner’s buildings as well) greater than ???#feet dependent upon a ‘sliding-like’ scale considering numerous factors including land slope of both landowner and neighboring lot(s) [steeper=more distance needed to mitigate run-off], soil type, concentrated volume of water from impervious surfaces, etc.

These living, more Climate resilient, cleaner water retention sink “habitats” will evidently also continue to support and maintain the very reasons residents want to live from and within these rural/suburban ‘feel’ environs, both now and for generations to come.

*Provide more financial FTE support for existing non-profits(?) like Clark Conservation District’s program for a multi-fold increased generation and educational application of Native Trees, Shrubs and Plants. And even though their source ‘Growers’ have their own limitations/offerings the Districts’ employees (or another neighboring educational institution) also do enlist a team of students to increase potted native plant stocks too.
**add staff to Code enforcement to help handle this within the context of Storm Water Management with frequent, regular oversight by an outside agency…to be sure it is getting done appropriately.