

**From:** [Oliver Orjiako](#)  
**To:** [Jeffrey Delapena](#)  
**Cc:** [Jose Alvarez](#)  
**Subject:** FW: FOCV Comment on the Comp Plan Update plans  
**Date:** Wednesday, June 12, 2024 8:07:00 AM  
**Attachments:** [image001.png](#)  
[Clark County Community Planning June 11.pdf](#)

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Hello Jeff:

FYI and for the comp plan index record. Thanks.

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**From:** Friends of Central Vancouver <friendsofcentralvancouver@gmail.com>  
**Sent:** Tuesday, June 11, 2024 6:36 PM  
**To:** Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>  
**Cc:** Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>; Sue Marshall <Sue.Marshall@clark.wa.gov>; Glen Yung <incrediblehistorichomes@gmail.com>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>  
**Subject:** FOCV Comment on the Comp Plan Update plans

**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.

Dear Clark County Staff,

Pleased accept the attached file as it is from the Friends of Central Vancouver and it is ready to be submitted for public comment regarding the comp plan update planning.

Best regards,

Jan Kelly  
FOCV  
Friends of Central Vancouver  
PO Box 821665  
Vancouver, WA 98682



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Clark County Community Planning  
Comprehensive Plan EIS Scoping  
P.O. Box 9810  
Vancouver, Washington 98666-9810

June 11, 2024

Dear Staff:

Subject: Comments on the Clark County Comprehensive Plan Update 2025-2045  
Sent via email: [comp.plan@clark.wa.gov](mailto:comp.plan@clark.wa.gov)

Dear Clark County Staff,

This letter is in response to the preparation and gathering of information regarding the Clark County Comprehensive Growth Plan for 2025-2045.

1. First, the county needs to reiterate and emphasize its commitment to prohibit heavy industrial development adjacent to or close to any existing or expected residential development, schools, or churches.

This is especially relevant to proposed or actually completed mines, clear cutting, soil stability danger and stream degradation, as evidence by cease-and-desist letters to PVJR from the federal Environmental Protection Agency, the US Army Corps of Engineers, the Washington State Dept of Ecology and Clark County sent to the Chelatchie Prairie Railroad Line/Portland Vancouver Junction Railroad (PVJR).

Unfortunately, the County has in the past abrogated its own Growth Plan and agreed-upon zoning to accommodate inappropriate, unsafe and environmentally risky heavy industry.

In particular, in the past the County has approved residential housing developments as close as 25-50 feet from the railroad lines. The existing decisions and future zoning plans to allow residential development adjacent to the railroad line alone should negate any plans for heavy industry and freight use along the Chelatchie Prairie railroad line.

In outlying areas along the railroad line between Battle Ground and Amboy environmental protection should be the County's paramount concern before heavy industrial or railroad development irreversibly degrades our precious environment.

2. The negative and inappropriate impact of heavy industrial development along this corridor impacts all residential construction and the quality of life of all residents, no matter what their income level. The seismic activity and loss in property values will have a negative effect on all properties from apartments to mobile homes to multi-million dollar properties.

3. The heavy train cars combined with heavy freight, and the speed of the rail car movement have caused significant seismic activity resulting in alarming shaking of the many homes that were built during the decades of non-activity along the rail lines. The Comprehensive Growth Plan should take these soil stability and seismic impacts on residences into consideration prior to granted building permits.

4. Recently we have seen multiple warehouses and logistics centers along NE 88<sup>th</sup> street and Andresen / NE 72<sup>nd</sup> Ave without sufficient traffic lights or attention to changes in traffic patterns as semi-tractor trailers navigate residential streets and already-densely travelled Andresen Rd. Traffic at intersections is a nightmare. Additionally, warehouses do not have a direct access to the 205 freeway. In my humble opinion, the Growth Plan should make special efforts to avoid compounding this error as it establishes guidelines for future light industrial growth along the Padden Parkway/I-205/Andresen corridor.

5. Currently, the County rules regarding notification of proposed zoning changes only require paper notifications to residents within 500 feet of the property to be rezoned. This rule is obsolete. Today rezoning impacts typically, a far larger area than a 500-foot radius of the to-be rezoned land. These decisions effect hundreds of residents, traffic, and sensitive environmental areas embedded in residential and light industrial settings such as Salmon Creek and Curtin Creek. issues. The notifications should be expanded to one mile from the building site.

6. It is our understanding that state requires our county to include a climate change segment within our update to the Comprehensive Growth Management Plan 2025-2045. Our county needs more parks, more trees, and more green spaces. While we all understand the need for affordable housing, let us remember that the community and residents need open spaces. Humans require green spaces, the green spaces supply us with clean air, and a healthy environment. Therefore, it is our opinion that green spaces, wide streets and a tree canopy is essential to our county and the residents. Please include these elements into our county planning for the health of our community.

7. The County appears to be allowing the clearing of our tree canopy without any permits. (Please use the PVJR Barberton property as a point of reference) Or the County is not enforcing its and the state's own permit requirements? Recent experience suggests that PVJR is operating under a "Do it first, see if we get caught and beg forgiveness later" policy.

My research (and common sense) indicates clear-cutting trees yields higher ground and air temperatures. An example is the experience of Paris as reported in the New York Times article. (Paris Turns 'Little Belt' of Train Tracks into Green Spaces...September 9, 2023). When the city reclaimed an abandoned rail line and turned it into a tree and plant-lined walking trail. The

results of their efforts have been decreased temperatures in Paris. This is nature reclaiming the environment from the cement and asphalt urban growth.

Clearly, the lack of trees contributes to global warming. Why are we allowing our tree canopy to be clear cut for the cement and asphalt developments?

In short, our trees and green spaces are essential and critical to our climate and our health. Heavy industry and turning our agricultural and open land into warehouses and parking lots are not a plus for our community, our quality of life, and the preservation of our eco-system and for our future drinking water.

Is a concrete warehouses and asphalt parking lots what we want to leave to our children and those that come after them? The County is on a path to destroying exactly those features of Clark County that make it an attractive place to live, work and raise families.

8. Surface Mining Overlay (SMO) should never be considered in an area where the soil has previously been evaluated as being sensitive to landslides, in addition to being the source of water for our creeks and rivers that are vital to our protected fish and wildlife in addition to being the headwaters and one of the sources for our well water. All of our drinking water comes from wells, either owned by the City of Vancouver or private wells from Brush Prairie north to Chelatchie Prairie.

9. In conclusion, we the community, depend on our planning department to consider the natural resources of our county, and our eco-systems in the permitting process. We depend on the county to insist that each and every development conduct an Environment Impact Study (EIS) prior to the granting of the building permits.

We depend on the county to enforce all our current building codes and permit processes without favor to the RR operator, mine operators or any other business asking for an overlay or plain ignoring the permitting process all together.

We expect the County and the judicial system to provide extra diligence to requests for zone changes, with the burden of proof that the quality of life and environmental impact being on the party requesting changes, not those defending what had been agreed-to for decades.

Working with the community, I am confident that the future planning for Clark County can be beneficial to the growth and well-being of our county in addition to all the residents. We all need jobs, we also need clear air, clean water, and the ability to grow and produce our own food. Our county must strive to be self-sufficient while protecting our resources, our neighborhoods, our AG land and our eco-systems.

Best regards,

Janet Kelly

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