

**From:** [Jeffrey Delapena](#)  
**To:** [Clark County Citizens United, Inc.](#); [Gary Medvigy](#); [Karen Bowerman](#); [Michelle Belkot](#); [Glen Yung](#); [Sue Marshall](#); [Oliver Orjiako](#); [Jose Alvarez](#); [Kathleen Otto](#)  
**Cc:** [Jenna Kay](#)  
**Subject:** RE: Flawed State Environmental Policy Act (SEPA) scoping to the Comprehensive Plan  
**Date:** Thursday, July 18, 2024 8:14:00 AM

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Good day Carol,

Thank you for submitting these comments regarding the EIS Scoping Report and the Comprehensive Plan. I have added additional staff to review and will add these to the Comprehensive Plan Index of Record.

Regards,  
Jeff Delapena

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**From:** Clark County Citizens United, Inc. <cccuinc@yahoo.com>  
**Sent:** Thursday, July 18, 2024 1:29 AM  
**To:** Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>; Gary Medvigy <Gary.Medvigy@clark.wa.gov>; Karen Bowerman <Karen.Bowerman@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Sue Marshall <Sue.Marshall@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>; Kathleen Otto <Kathleen.Otto@clark.wa.gov>  
**Subject:** Fw: Flawed State Environmental Policy Act (SEPA) scoping to the Comprehensive Plan

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Clark County Planning Commission  
Jeff Delapena, Program Assistant  
Clark County Community Planning  
PO Box 9810, Vancouver, WA 98666-9810  
CC to Clark County Council

July 17, 2024

FOR THE PUBLIC RECORD AND THE COMPREHENSIVE PLAN

**Re: Flawed State Environmental Policy Act (SEPA) scoping to the Comprehensive Plan**

Dear Planning Commission and Councilors,

Clark County Citizens United, Inc., a 501c4 non-profit representing approximately 6,000 members, has reviewed the EIS - SEPA scoping report to the Comprehensive Plan, submitted by Clark County staff, and for the record believe it to be highly flawed. In a nutshell, it is just plain story telling, that only contains a truth with a lie. CCCU members attended one of the scoping open houses, and it was just like the hundreds of such meetings that have been

attended. Nothing changes, except the locking down of the rural areas even more.

CCCU has been involved in county land use for over 30 years, and will continue to be active until Clark County finally gets it right. There needs to be equity and fairness for all citizens in Clark County, and that includes the rural and resource areas. The GMA Comprehensive Plan was flawed from the beginning, and staff knows it. The Courts, on behalf of CCCU, have told them so, and yet nothing changes. The court orders on CCCU's side are ignored while any Hearing Board or Court action on the environmentalists side is explicitly adhered to. Such county actions have gone on far too long, and changes throughout the Comprehensive Plan need to happen.

The following is a "copy and paste" account of the scoping document. Interjected into the text are **CCCU Notes** regarding the text of the report. If staff is asking the Planning Commission to approve this flawed document, such approval will set the stage for more of the same, a critical housing shortage and joblessness. It needs to be fixed.

Sincerely,

Carol Levanen, Exec. Secretary

Clark County Citizens United, Inc. - P.O. Box 2188 - Battle Ground, Washington 98604.

### **State Environmental Policy Act (SEPA) scoping**

- Comment period ended June 5, 2024
- Clark County hosted four public open house events as part of the scoping process.
- **May 28: Ridgefield High School (CCCU Board members attended this open house)**
- May 29: Vancouver Community Library
- May 30: Battle Ground Community Center
- May 15 – June 5: **Online, self-paced open house**

**Join by computer:** [Meeting Link](#)

**Meeting #:** 2490 115 2046

**Password:** 1234a

**Join by phone:** 1-408-418-9388

### **Climate Project Update: Greenhouse Gas Reduction Sub-Element**

- [Presentation](#)
- [Greenhouse Gas Inventory Fact Sheet](#)
- [Clark County Community Greenhouse Gas Inventory](#)
- Public Comments Received

### **Comprehensive Plan Periodic Review EIS Scoping Update**

## Presentation

- [EIS Scoping Summary](#)
- [EIS Scoping Comments - Part 1](#)
- [EIS Scoping Comments - Part 2](#)

### EIS Scoping Summary

#### Introduction

Clark County's Comprehensive Plan (Plan) is the official document that establishes the goals, policies, and benchmarks to guide future development. The Plan guides decisions about where housing and jobs will be located and where we invest in transportation, utilities, parks, and other public assets. It is the vision for how our communities will grow and flourish over the next 20 years. Washington State's Environmental Policy Act (SEPA) requires the County to prepare an assessment of the Plan's potential impacts.

As part of that process, public input was provided at three in-person public meetings (May 28, 29, and 30, 2024), through an online comment submittal webpage, through a webaccessible open house-style presentation, and via email. This input helps county staff determine the scope of the environmental analysis. This document summarizes comments received during the 21-day scoping period from May 15 to June 5, 2024.

#### Summary of Comments

Ninety-four (94) submittals were received during scoping via public meetings (handwritten and oral submittals), emails, letters, and online. During the formal scoping period, comments were received from stakeholder organizations, members of the general public, and governmental agencies. While some comments may not be strictly applicable to the SEPA or comprehensive planning process, a summary of all provided comments is presented below.

**CCCU NOTES: How does oral submittals get into the public record? If so, it would be staff interpretations of what was said, which may not be accurate. Isn't an email an on-line process?**

#### Topics for Analysis

Commenters identified a variety of topics they wished to see assessed in the environmental impact statement (EIS). Commenters specifically recommended the EIS assess all elements of the environment required under state law. Additionally, impacts from urban growth area (UGA) expansion, transportation, railroads, rezoning, anticipated developments, surface mining, and site-specific re-zoning requests were recommended for assessment. Several commenters requested the analysis of converting agricultural lands to other uses.

Commenters asked that the County develop goals and objectives/performance measures for their analyses. Individual elements of the environment about which commenters expressed concern included water quality, wildlife habitat (including biodiversity areas, corridors, and habitat connectivity), air quality, climate, groundwater aquifers, and farmland, as well as cultural, social, and economic resources. One commenter recommended evaluating the impacts of local critical areas ordinances that do not incorporate current riparian habitat management recommendations, along with the impacts of forest practices conversions.

**CCCU NOTES; One commenter cannot speak for the entire county.**

#### Zoning

Some commenters expressed interest in increased density in rural areas, while others wanted

to see density restricted to incorporated cities and their UGAs. **CCCU NOTES; Clark County Citizens United, Inc. knows, from the input received from approximately 6,000 members, that they want the zoning to go back to what it was before the GMA. CCCU has notebooks of their testimony documents that tell that story.** Several commenters want to see setbacks between industrial zoning and residential housing. UGA Expansion Some commenters expressed opposition to expanding UGAs. Others recommended expanding UGAs as long as farmlands, wildlife habitat, and rural character are protected.

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### **Housing**

Distance between jobs and housing and access to affordable housing were identified as important aspects. Commenters also expressed support for increased housing density; some preferred to see additional housing in UGAs, while others wished to see more housing in rural areas. One commenter felt the County's Vacant Buildable Lands Model (VBLM) includes flawed assumptions about land available for housing. **CCCU NOTES; That one commenter was Clark County Citizens United, Inc. who represents approximately 6,000 members, all Clark County taxpayers. The assumptions propose to reduce the rural to urban ratio to 5/95, from 10/90, (which was changed from 20/80 in 2004) Such planning is backwards, and is what put the county in the critical affordable housing shortage, in place today. Rural development is the "buffer" for the cities. There needs to be other places in the county for people to live, particularly as it pertains to rural people, whose families have lived in the rural areas for generations.**

### **Farm Lands**

Several commenters stressed the importance of preserving and maintaining high-quality farmlands. One requested a goal of no loss of agricultural lands in the county. **CCCU NOTES: One comment does not make a whole county. It is a certain fact, verified by 1990 and 1993 documents and GIS metadata, that all of the agriculture zoned land in Clark County, was determined via aerial photography and staff interpretation, and not by soil, required by the GMA. Eighty (80%) percent of the agriculture land in Clark County is less than the 20 acre zone. That zone needs to change to reflect what is on the ground.**

### **Transportation**

A variety of comments regarding transportation were received. Many commenters want infrastructure improvements, less traffic, improved road safety, more public transportation options, better public transit connectivity between communities, additional parking required for all future developments, and future development focused near transportation hubs. Some commenters want to see city streets made more pedestrian-friendly by designating streets as pedestrian only and/or converting public parking to public seating and parks/gardens. Other commenters wished to see larger roadways with parking on both sides, remarking that current infrastructure cannot support current traffic levels. Several commenters were interested in an increase in bike trails and other bike-related infrastructure. Adding electric vehicle chargers and supporting electric vehicles was important to some commenters wishing to see reduced greenhouse gas emissions. Some commenters expressed interest in light rail options to nearby cities in the county as well as to Portland. Several commenters want improvements and significant investment to C-Tran to increase accessibility and connectivity between cities

within the county and promote opportunity across different tax brackets. **CCCU NOTES: These "commenters" certainly know more about what they want in transportation than seems reasonable, given they have never had access to any details. CCCU must assume that this is just staff talk, and not a reflection of the open house scoping. Very few Clark County citizens support light rail, anywhere in the county.**

### **Rail**

Commenters expressed concern about the freight-rail dependent use (FRDU) proposal and other potential future rail improvements. **Many** questioned the need to refurbish, expand, or support the expansion of rail in the County. Concerns included impacts to air quality, human health, wildlife, and wildlife habitat. **Some commenters expressed interest in light rail options to nearby cities in the county as well as to Portland.** **CCCU NOTES: It is well known that the citizens do not support light rail in Clark County. Staff put this false claim in this topic as a scare tactic for the public. CCCU remembers when the also used "nuclear plant" as another scare tactic to stop consideration of the FRDU.**

### **Mining**

Some commenters were concerned over the development of aggregate mining in the county and requested analysis in the EIS to ensure preservation of communities and natural environment in the county. Placement of quarries near residential areas was a concern. **Several commenters suggested importing aggregate to avoid potential negative impacts.** **CCCU NOTES: It would be interesting to know just who the "several commenters" are, because CCCU can confirm those in the building industry and landowners do not want to pay the excessive costs involved with importing aggregate. It is simply not an option for Clark County, as there is an abundance of excellent aggregate at the doorstep, in the Chelatchie Prairie area.**

### **Jobs**

Commenters were concerned about having sufficient land available to accommodate projected job growth. Some feel that additional land will be needed for projected jobs, while **others wish to see land allocated for specific job sectors (e.g., construction).** One commenter asked that the distance between jobs and housing be considered. One commenter felt the County's Vacant Buildable Lands Model (VBLM) includes flawed assumptions about land available for job growth. **CCCU NOTES; Clark County Citizens United, Inc. submitted the comment regarding the VBLM on behalf of its approximately 6,000 members. CCCU gives testimony on their behalf. CCCU does not know how "job sectors - construction came into the report. Citizens want a living wage, in any kind of profession.**

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### **Environmental Protection**

Many commenters requested that the natural environment (e.g., wildlife, wildlife habitat, trees, greenspaces, wetlands, rivers, lakes, etc.) be protected from negative impacts due to development and that an analysis of growth alternatives be conducted to assess and compare potential impacts to the natural environment.

### **Climate**

**Commenters** identified climate impacts due to increased development as a concern. **CCCU NOTES: What commenters? Do they have an environmental agenda they insist must be adopted, or is this simply staff talk.** Commenters wished to see an analysis of how

different growth alternatives might influence or be influenced by a variety of aspects of projected climate change (e.g., flooding, drought, wildfire, precipitation patterns, wildlife movements, infrastructure development). Several commenters requested that development impacts be mitigated such as through the use of electric vehicles, installation of solar panels, use of double-pane windows and heat pumps, and the planting/protection of trees. Several commenters called for the Comprehensive Plan update to comply with new legislation that requires local comprehensive plans to have a climate element. Several commenters provided example documents outlining climate issues and potential frameworks supporting climate resilience and equity related to climate issues. **CCCU NOTES; These "comments" are simply false, and what is written here comes from staff.**

### **Air Quality/Greenhouse Gasses**

**Commenters** feel that future development should avoid or reduce impacts to air quality in areas with already unhealthy air quality. **Some commenters** wished to see a reduction of vehicle miles travelled in the county and some asked that vehicle miles travelled per growth alternative be assessed in the Comprehensive Plan and/or EIS. **CCCU NOTES: Once again, these comments did not come from the general public. They either came from a local environmental group or are staff generated.** Additionally, concerns were raised by commenters who felt idling trains may lead to reduced air quality. **CCCU NOTES: This "idling trains" comment is to instill the reader to be opposed to any use of the Chlatchie Prairie Railroad.** **Several commenters** remarked on their desire to see that the Comprehensive Plan meets new legislation in house Bill 1181 which requires local comprehensive plans to have a climate element with resilience and greenhouse gas emissions mitigation sub-elements. **Several commenters** requested an analysis of greenhouse gas emissions that could result from different growth alternatives. **CCCU NOTES: Just how many is "several"? No one knows as that information is not available in this report.**

### **Parks/Greenspaces**

Some commenters felt development should include greenspaces. Commenters want the County to ensure enough parks per capita by supporting funding, **protective zoning**, and responsible management. There was a request to include equestrian activities in parks. One commenter encouraged the County to revise the boundaries of the districts that are used for assessing park impact fees. **CCCU NOTES: Just what is "protective zoning"? CCCU doubts that a comment like that came from the general public and is likely "staff talk" in an attempt to justify not reducing lot sizes in the rural areas.**

### **Recreation**

Several commenters expressed concern about the potential impacts of the Comprehensive Plan update on equestrian opportunities. Some commenters mentioned the economic value of the equestrian community and asked that consideration be given to them in preparation of the Comprehensive Plan. Several commenters asked that bike trails be included in future development planning.

### **Rural Character**

Commenters identified the preservation of rural spaces, protection of greenspaces, and protection of air and water quality, as important to their rural way of life. **CCCU NOTES: This is right out of the local environmental group's playbook, and not a part of general public comments from those who might have attended the open houses.** **Several voiced concerns** over the loss of rural character due to rural densification and UGA expansion. **CCCU NOTES; Just who are the several voices? CCCU heard none of this at the open**

**house we attended.** Others requested increased densification in rural areas and wished to see no expansion of UGAs into rural areas. **CCCU NOTES: It is interesting that staff combined two dissimilar things into one sentence. Yes, the public wanted to see increased "desification" in the rural areas, and they were neutral over UCA expansion. One commenter** felt the current definition of rural character should be amended to be less generic. **CCCU NOTES: This "one commenter" happens to be Clark County Citizens United, Inc., who represents approximately 6,000 members. As their representative, CCCU can affirm, all want the old zoning back. To do that, a definition of rural character reflect the small parcels that show 90% of the rural parcels are less than their current zone. There is clearly something wrong with a Comprehensive Plan that does that.**

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**Social Justice/Equity** Several commenters remarked on the need for the County to include consideration of social justice and equity in their comprehensive plan update and hoped the Community Planning Department can be respectful and inclusive of disenfranchised individuals. Access to affordable, timely healthcare was raised as a concern by some. Others identified a need for public transit infrastructure improvements to increase equity across tax brackets. **CCCU NOTES: Where such comments came from is a mystery. They likely came from the same environmental group that dictated the "alternatives", as they advised staff.**

### Site-Specific Requests

**A number of commenters** submitted requests to change the zoning of their property, to allow for higher-density development. **CCCU NOTES: The majority of these requests were from rural land owners asking for the previous zoning.** A school district and a port requested expansion of the UGA boundary. One commenter asked to limit development of their property to avoid increased traffic. Another asked that a bike path be installed near their home.

### Alternatives

**Commenters proposed a number of alternatives for analysis in the EIS.** A summary of potential alternatives, or elements of alternatives, identified for assessment **CCCU NOTES: Just who are the "commenters" who proposed a number of alternatives? If there were any, they certainly know more than CCCU does, as our membership and other members of the public had no such opportunity to do so. Did staff sit at a table with the environmentalists to decide these alternatives, or did they just make them up themselves. One thing that is obvious, the majority of these alternatives would stop any development in the rural areas and along the 33 mile Chelatchie Prairie Railroad.**

- Alternative with no UGA expansion, -
- **Alternative that focuses all growth inside city boundaries.**
- Alternative with minimal, responsible UGA expansion.
- **Alternative that does not promote sprawl. - Alternatives that would avoid environmental impacts.**
- **Alternative that would deny all site-specific requests.**
- **Alternative that would prohibit surface mining overlays in the Chelatchie Bluff area.**
- **Alternative that would prohibit zoning changes under expansion of FRDU overlay.**

- Alternative that would terminate the Portland Vancouver Junction Railroad (PVJR) lease and hire an operator.

- Alternative that includes adding the Port of Camas-Washougal's 12 properties to the Camas UGA Process

Some commenters requested an extension of the deadline for submitting scoping comments. Commenters encouraged the County to consult with local indigenous communities and conduct additional outreach to small community groups and associations. One commenter requested that the County prepare and share a scoping report and provide opportunities for public review and comment on alternatives to be carried forward for detailed analysis. **CCCU NOTES: This flawed scoping report does not reflect what the citizens want. It is just a replay of what has happened in the past. Staff controls the narrative and the only thing that changes is the locking down of rural development and rural jobs.**

### **Mitigation**

Several commenters identified opportunities to mitigate potential impacts of development. Potential mitigation measures included preservation and restoration of trees, natural areas, wetlands, and aquatic habitat. Limiting forest conversion, restricting zoning density, native landscaping, increased solar panels, and green stormwater infrastructure were identified as potential means of mitigating effects of future development. **CCCU NOTES: These comments are all staff discussions, with the help of a local environmental group.**

### **Other:**

A number of comments did not fit clearly into the categories outlined above. A summary of these comments is provided here: - Questions about whether horses have right of way at roadway intersections. - Wishes to get rid of homeowner associations.

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Wishes to get a Comprehensive Plan Update for La Center. - Add staff to Code Enforcement to ensure compliance with setback requirements in unincorporated areas of the county. - Requested an update to the 1993 50-year Framework Plan - Wishes to see an assessment of recycling included in the Comprehensive Plan. - Requested increasing waste management pickups to weekly.

Clark County Citizens United, Inc. P.O. Box 2188 Battle Ground, Washington 98604 E-Mail [cccuinc@yahoo.com](mailto:cccuinc@yahoo.com)