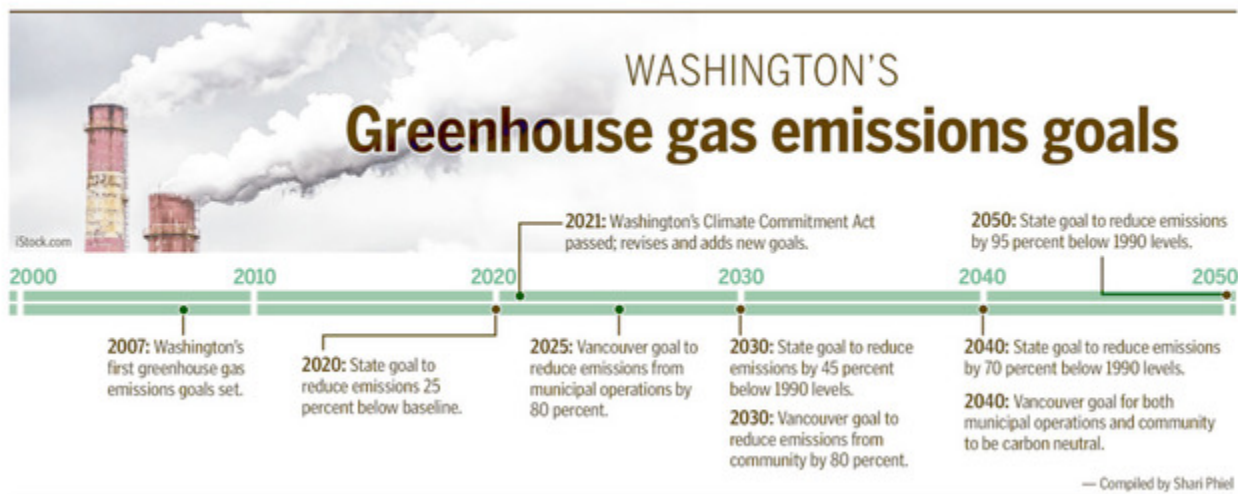


Jenna Kay

From: Randal Friedman <randalfriedman@gmail.com>
Sent: Monday, December 23, 2024 12:51 PM
To: Jenna Kay; Amy Koski; gary.albrecht@clark.wa.gov
Cc: Rebecca Small; Mitch.Kneipp@cityofwashougal.us; David Stuebe; Don Steinke; Denis Hayes; Shari Phiel; Alan Peters
Subject: CLARK COUNTY CONSIDERATION OF THE CLIMATE CHANGE/HOUSING OPPORTUNITY FROM THE PROPER CLEANUP OF THE CAMAS MILL
Attachments: Washougal Plan submittal.pdf

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Greetings — Last week's Columbian article by Shari Phiel did an excellent job describing the difficult road to meet Washington's GHG goals: 70% by 2040 (within the Comp Plan update) and 95% by 2050. This at a time when GHG emissions have been rising. As the article points out, the State's GHG emissions have increased by 19% since 1990. It is a "tall order".



I have submitted the attached paper to the Community Development Director and Mayor of Washougal. It begins by recognizing the difficulty the City of Washougal faces to meet Washington State's Comprehensive Planning climate change/resiliency and housing requirements. Demonstration of success might be more attainable with "non-operational" portions of the Camas Mill (already designated by the Department of Ecology (DOE)), remediated for unrestricted future use based on the concept of a Historic Regional Employment Center. The Society's plan is linked here. <https://online.flippingbook.com/view/952378320/>

Clark County has embarked on a most ambitious and challenging path to meet state requirements. The difficulty of this effort, and a potential solution, was chronicled in The Columbian.

The state goal requires emissions be reduced from 1990 levels, which is also referred to as the baseline. The goal increases to 70 percent below 1990 levels by 2040 and 95 percent below 1990 levels by 2050..."Given how the state's climate legislation was written, [Jenna] Kay said there is opportunity for the various jurisdictions to work together. "Not only do you have to reduce greenhouse gases, you cannot increase emissions somewhere else in the state. You're also not allowed to do something that pollutes more in your neighboring town or something like that," she said.

In this light, Clark County should consider seeking standing before the Department of Ecology's (DOE) evaluation of the Mill's future. This standing recognizes a compelling public purpose for remediation of a Historical Regional Employment Center. Moreover, Clark County should seek this area being available for regional climate change and housing affordability needs. This regional context should represent the "expectation" the Model Toxic Control Act (MTCA) tasks DOE considers in evaluating whether land remains industrial. Instead, DOE's expectation could be that non-operational portions of the Camas Mill be considered as a "Historic Regional Employment Center" and remediated for unrestricted use. Looked at another way, Camas' inaction can be viewed as increasing emissions amongst its neighbors. This increase reflects lost opportunities for VMT reduction, for example. Given meaningless jurisdictional boundaries for GHG pollutants, Camas is holding back what could be significant reductions outlined in the paper. Of course these will remain unknown unless considered in the planning process.

Consider only the 27 acre "lab site." Several yeas ago I made the attached graphic to show how only the upper-half of the lab site could hold the Adidas North American HQ. Since then, two more buildings were added on those back pads for buildout. The site accommodates 2,500 jobs, a large indoor athletic center, and even a soccer field. You can read about it here. https://leverarchitecture.com/projects/adidas_headquarters_expansion_and_gold_building

The lab site has similar topography and could accommodate parking with housing over commercial. The site could be cleaned well within the time frame of the plan. With the pulp line shut down across NW 6th Ave, what used to be a noisy canyon is quiet. Longer term it might be developed with the building mass already there. Adaptive reuse of those buildings might create some great opportunities. I'm told there are some beautiful locations. This needs to be our County's future, not giving up this opportunity for some true New Urbanism by insufficient cleanup.

In the continuing work on the mill cleanup Camas refuses to consider anything but the status quo. In fact, Camas won't consider future use as it would "offend" the mill. Yes.. Koch Industries largely non-operational mill can site idle and padlocked and that is its current course under the MTCA. Ecology is suggesting that the MTCA doesn't allow them to consider climate change/housing needs voiced by anyone but the City. They are bound to an industrial cleanup. No public access. No housing. No shoreline access or jobs beyond the 150 remaining on the towel line (that the Mill District plan protects). This from what was the largest specialty paper mill in the world employing more than 2,500 family wage jobs.

Hogwash. The MTCA and Growth Management Act should be synchronized. In 1990, DOE noted:

"When Washington voters passed the Model Toxics Control Act as Initiative 97 in 1988, they provided Ecology with not a pre-packaged solution for hazardous waste cleanup, but rather the basic framework for a toxics cleanup program. The back-bone of the Model Toxics Control Act — how hazardous substances will actually be cleaned up and how well it will work — would depend largely on how the law was implemented."

With the difficulty ahead, our state should encourage regional aspirations for solutions. While the City of Camas, of course, decides ultimately the future land use they alone shouldn't dictate the cleanup level. With the potential for thousands of jobs and housing units, compact and next to downtown, this can make feasible public transit alternatives. This building can meet the high standards for buildings, incorporate solar, EV charging, and so many other things. These issues were hardly a consideration in 1988 when voters created the MTCA, and the relationship between planned development and GHG reduction wasn't a consideration.

All this happens with a repurposed mill. The mill's cleanup can be considered part of the ongoing implementation of the MTCA. This is necessary for the drastic changes required in planning the next 20 years and beyond.

I am a Camas and Clark County citizen. I have delivered Meals on Wheels to parts of a Washougal many don't see and serve meals at Refuel Washougal. I've helped box food at the Clark County Food Bank. These clients, and far too many others in forgotten parts of Clark County belong in your planning process. The Mill District Plan can help them. Please consider populations more and more challenged by affordability and mobility issues, and how they could benefit.

Just one example is VMT. As noted in the Mill District plan, the Mill District could link with Washougal and even the 192nd corridor via a free electric shuttle as Estes Park, CO has shown for decades. You need density to accomplish that. A padlocked and rusting mill covering hundreds of buildable acres could be the key to tying three cities together with carbon free transportation. Between the efficiencies of dense downtown development, this could tackle the current 64% of GHG coming just from transportation and heating.

Thank you and please consider this a formal comment to the plan update and provide to the Advisory Committee.

Randal Friedman
Camas



CONSIDERATION FOR “HISTORIC REGIONAL EMPLOYMENT CENTERS” UNDER WASHINGTON’S MODEL TOXICS CONTROL ACT (MTCA)

SUMMARY¹: The City of Washougal's ability to meet Washington State's Comprehensive Planning climate change/resiliency and housing requirements represents a significant challenge. Success toward achieving these planning requirements might be more attainable with recognition that “non-operational” portions of the Camas Mill² be remediated for unrestricted future use. The City of Washougal should seek standing as part of the Department of Ecology's (DOE) evaluation of the Mill's future. This request recognizes the unwillingness for Camas to consider regional expectations for remediation as a “Historical Regional Employment Center.” Regional expectations should be beyond the City of Camas' sole determination. Regional climate change and housing affordability needs are two compelling examples of why DOE should listen to the expectations of neighboring stakeholders, like Washougal, when it considers the State's “expectation” for the Camas Mill's next chapter. This is part of the ongoing implementation of the MTCA as noted in DOE's first 1990 Annual Report. The Comprehensive Plan Update provides a means to consider this within the State's framework.

BACKGROUND: With Washington's recent mandatory Comprehensive Plan additions accounting for climate change/resiliency and housing allocations based on additional income-levels, the City of Washougal's ability toward achieving compliance has grown in scope and difficulty. The future of the Camas Mill could have significant beneficial implications for Washougal's efforts to demonstrate the required road to climate neutrality and housing affordability. Given Washougal's twin challenges of carbon and housing costs, the Mill District Plan proposed by the Camas Earth Day Society provides a new tool for the city's planning toolbox.

After the Washougal Community Development Director's presentation on the Comprehensive Plan update to the Rotary Club of Camas-Washougal, a question asked was “if a portion of the non-operational Camas Mill property were to support several thousand housing units and several thousand jobs, would that favorably impact Washougal's ability to meet aggressive state-mandates for climate change, Vehicle Miles Traveled (VMT) reduction requirements, and other easily modeled benefits”? Couldn't derived benefits accrue in Washougal with a Mill District overlay?”

VMT REDUCTION With the density node Washougal has started and is creating, Washougal's existing and future residents might benefit from a shuttle connection to the Mill District, Camas' Historic Downtown and the growing Hyas Point master planned Port project. The four combined make a population size and distribution favorable to a carbon-free shuttle. Estes

¹ Prepared by Randal Friedman, Rotarian, Camas, Washington. The views expressed are the author's alone.

² Non-operational land has already been designated by the Department of Ecology and are shown on Exhibit A on page 6.

Park, CO is a decades old example of reducing adverse transportation impacts right down to its eclectic electric shuttle³. A shuttle could expand to the North Shore, should that development ever happen, as well as the 192nd corridor, and create additional VMT/carbon reductions. This potential for VMT reductions under a Mill District plan contrasts with the *status quo* where each node would be modeled separately, with each almost exclusively relying on private automobiles. Your consultants can do this. I bet they'd enjoy it.



There's a way to reduce VMT, in a regional model, but you need the proper inputs. In this case, examples include new dense walkable communities, connection by carbon free transit, making most needed services provided carbon free. Then the model does its magic and evaluates whether this is a better road toward new compliance requirements. Your consultants can do this.

That's what the non-operational areas of the Mill identified by DOE can do. The Society's proposed addition to Camas' Comprehensive Plan recognizes this as foundational.⁴ This creates an alternative of true *New Urbanism*.

THE MILL DISTRICT PLAN OPENS A DOOR: As Washougal's Community Development Director acknowledged at the Rotary meeting, the question was somewhat rhetorical, and then noted obvious benefits. The Director mentioned there might be ways to "horse trade" through an overlay process. While colloquial, conversations between the two cities could be the start of some meaningful regional planning for issues like transportation and housing, where mutually shared city boundaries have less meaning. Again, your consultants can model this potential.

Consideration of the Mill District Plan demonstrates benefits to challenged populations of Washougal. How? The Mill District plan creates potential and powerful benefits including affordable housing, coupled with the mobility all citizens need for survival and improvement. That is what the opportunity to transition a Historic Regional Employment Center, including hundreds of waterfront acres already deemed no longer operational by the State of

³ Electric trolley shown. For info see https://www.visitestspark.com/plan/getting-around/free-shuttle-buses/?gad_source=1&gbruid=0AAAAAD_lpgM_VNoYP-vtfxp1xt4sjKZoF&gclid=EAlalQobChMIw4j02f2vigMV_w2tBh2R3DmkEAYASAAEgJmmfD_BwE

⁴ Page 12: "The Mill District recognizes regional trends in East Vancouver and Washougal that are creating a linear urban corridor along HWY 14. Future development of non-operational mill property can enhance the ability for a public transportation alternative reducing the needs for parking and oversized roads throughout this corridor, allowing more use for economic, recreational, and environmental purposes. The Mill District supports potential consideration of other public transportation options for other density nodes in Camas such as the North Shore."

Washington. These hundreds of acres are now subject to cleanup order⁵. The Society's plan could provide benefits across all income levels through improved transportation, access to better services, and economic opportunities for those in Washougal as well.

The Society's plan was inspired by the creation and actions of the Camas Mill Cleanup Community Advisory Group (CAG). For transparency, the author is a charter member of the CAG but speaks here as an individual.

The Society's plan has been reviewed by residents with local planning expertise and reflects their comments, as well as policy statements from the Yakama Nation. Already an initial observation of the plan from the Camas School District noted opportunities for school curriculum in areas like vocational and environmental education.

For over a century, the mill property was, and could once again become the anchor providing economic opportunities and VMT reduction well beyond Camas' borders. The unique location and size make the mill property, once again, the opportunity to anchor a greater community with lower impact on our limited environment. That the plan will result in increased municipal and school tax revenue needed given the long-term structural deficit.

THIS BEGS THE QUESTION: MTCA POLICY BACKGROUND: A question was raised on whether an overlay plan exceeds the requirements of the MTCA. Consideration of current requirements are discussed in the Mill District plan's background⁶. Is this wishful thinking beyond the expectations of the MTCA?

Let's go back to the beginning. MTCA's 1988 passage by Washington voters, still 20 years after the first Earth Day, shows sometimes change takes time and perseverance. We are in the age of climate change, and live in a state deeply committed to practices the state can take to establish new measures of resiliency. Initiative 2117, the repeal of "Cap and Trade", was overwhelmingly defeated, even with its present and future costs⁷ greatly communicated to the voters. Washington voters believe and expect their government to take Climate Change issues seriously. This includes decisions on how and who determines the cleanup levels for a Historic Regional Employment Center.

In the 1990 Model Toxics Control Act Annual Report⁸, DOE's first post passage of I-97, the first paragraph after the MTCA heading, page 2, begins:

⁵ Agreed Order DE 18201 <https://apps.ecology.wa.gov/cleanupsearch/document/104345>

⁶ This is necessary given the mill's historic and continuing Heavy Industrial zoning and MTCA act treatment of those zones. According to the Society's report, an industrial cleanup could result in hundreds of acres padlocked for decades subject to Koch Industries's balance sheet. There's also the mandatory covenant to keep hundreds of waterfront acres industrial without public access.

⁷ These costs were cited as benefits to the No on 2117 coalition, indicating a positive path forward to achieve mutual community goals. The cleanup of the Camas Mill will have private costs, but will result in substantial value increases through eventual development that becomes possible. The Mill District plan provides an indication to future investors that the City will embrace this type of future over more decades of sprawl.

⁸ <https://apps.ecology.wa.gov/publications/documents/9047.pdf>

"Each person has a fundamental and inalienable right to a healthful environment, and each person has a responsibility to preserve and enhance that right. The beneficial stewardship of the land, air, and waters of the state is a solemn obligation of the present generation for the benefit of future generations." — Model Toxics Control Act Declaration of Policy

The report's second paragraph speaks to the future course of our state's remediation efforts, and expectations of its development.

"When Washington voters passed the Model Toxics Control Act as Initiative 97 in 1988, they provided Ecology with not a pre-packaged solution for hazardous waste cleanup, but rather the basic framework for a toxics cleanup program. The back-bone of the Model Toxics Control Act — how hazardous substances will actually be cleaned up and how well it will work — would depend largely on how the law was implemented." (emphasis added)

WHY ARE "EXPECTATIONS" REALLY IMPORTANT HERE? Expectations⁹, the standard of review for DOE industrial property, will be a key consideration in the coming months as planning decisions and process are discussed. The discussion here has been about how regulatory programs evolve through changing times and circumstances. The Camas and Clark County of 1988 when Washington voters enacted this "fundamental and inalienable right" are not the Camas and Clark County of today. Washougal has changed significantly as well.

TODAY there's a different level of discussion. More and more requirements devolve from the state. Conversations with state elected officials and regulators occur more and more, and perhaps are where this conversation belongs. Is there interest in our new Governor's incoming Administration for consideration of how the MTCA interacts with climate and housing needs? That's a decision in Olympia where we will have a new Director of Ecology. Not to mention the arrival of Washougal's Mayor as a Legislative District #17 representative!

Speaking of Olympia, where one arm of the state is requiring achievement of difficult new climate/housing laws, shouldn't another arm of that state ensure that major "brownfield" sites are cleaned to facilitate state-mandated development with the least carbon footprint imaginable? Otherwise, are local governments being boxed-in by requirements to try true **New Urbanism** in a city footprint designed for yesterday's industries?

⁹ **WAC 173-340-745** To qualify as an industrial land use and to use an industrial soil cleanup level a site must meet the following criteria:(i) The department expects that properties zoned for heavy industrial or high intensity industrial use and located within a city or county that has completed a comprehensive plan and adopted implementing zoning regulations under the Growth Management Act (chapter 36.70A RCW) will meet the definition of industrial property."(emphasis added)

A BROADER VIEW OF EXPECTATIONS: As stakeholders in DOE's expanded consideration of expectations, the opinions of Camas' neighbors might prove helpful to support an unrestricted cleanup. The need for VMT reduction alone suggests the need for regional consideration. The potential for climate change benefits speaks strongly.

It is already noted how the MTCA will change through implementation. DOE has latitude, with discretion to find a comprehensive plan's zoning alone insufficient to meet regional "expectations." These have already been identified.

The Mill District approach is based on past public support from a series of key stakeholders. This included two past Camas mayors and most Councilors, Port Commissioners and staff. Those and many others Zoomed in to the Public Meeting Camas citizens petitioned for in 2021. In the middle of the strange world of Covid, an outpouring of stakeholders expressed support for a different future for the Camas Mill and a community advisory group to provide independent input to DOE. The community was a montage of small changing boxes on screens. One hopes it would still be in the record at some DOE cloud site. It was a community coming together to assert their beliefs and rights.

This decision should include the City of Washougal. You could start simple: choose a Mill District plan as an alternative in the consideration of plan alternatives for analysis,. Let your consultants be creative and get that value. They know the answer.

Now is the opportunity for Washougal to have a voice, and not a back seat to the mill. As declared by the voters of Washington in 1988, "The beneficial stewardship of the land, air, and waters of the state is a solemn obligation of the present generation for the benefit of future generations." The world today makes that obligation more important.

That it also makes sound fiscal sense for your taxpayers is the classic "win-win". In the long-term it is the Responsible Party (GP) that can ready the land for future private development with a substantially lower carbon footprint and new tax revenue. It is up to our elected officials and planners, throughout the region, to find the path there.

CONCLUSION: The structure of the Comprehensive Plan Update process considers alternatives. The Mill District overlay, as one such alternative, is in keeping with substantive new changes in broad state policy impacted by future land use decisions. Those decisions should consider and include their neighbors. The Mill District Plan should be evaluated as an alternative for the benefits cited.



Exhibit A: Operational areas shown in blue. All remaining area within the yellow boundary are non-operational and subject to the Agreed Order for investigation and cleanup. Graphic from Downtown Camas Association.