

Jenna Kay

From: Randal Friedman <randalfriedman@gmail.com>
Sent: Monday, December 30, 2024 2:37 PM
To: Jenna Kay
Subject: Re: CLARK COUNTY CONSIDERATION OF THE CLIMATE CHANGE/HOUSING OPPORTUNITY FROM THE PROPER CLEANUP OF THE CAMAS MILL

Follow Up Flag: Follow up
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Thanks Jenna. For transparency Denis connected me with the Attorney General's office to consider the state policy aspects of this question. They are significant and the new Administration and new Ecology Director have a chance to establish the connection between the MTCA and the "tall order" to meet state mandates.

Imagine the possible symbiosis between the increasing dense 192nd corridor with a project on even part of the mill like the lab site. Imagine stepping out onto 192nd with a fun electric shuttle coming every 10 minutes taking you to downtown Camas, the Port, and downtown Washougal.

I'll ask the same question I asked Mitch. If there were 2,500 jobs and 2,500 homes on mill property, what are the housing and VMT reductions now possible over the plan's time horizon. In Washougal and the County?

You could put 2,500 jobs on just the upper terrace using Adidas' North American HQ as a model. A closed portion of the non-operational pulp line is at the bottom.

To meet this requirements we need every tool tool box.

Randal



On Dec 30, 2024, at 2:23 PM, Jenna Kay <Jenna.Kay@clark.wa.gov> wrote:

Thank you Randal, confirming receipt of your comment.

Regards,
Jenna

<image001.png>

Jenna Kay she/her/hers
Planner III
COMMUNITY PLANNING

564.397.4968

<image002.png> <image003.png> <image004.png>

From: Randal Friedman <randalfriedman@gmail.com>
Sent: Monday, December 23, 2024 12:51 PM
To: Jenna Kay <Jenna.Kay@clark.wa.gov>; Amy Koski <Amy.Koski@clark.wa.gov>; gary.albrecht@clark.wa.gov
Cc: Rebecca Small <rebecca.small@cityofvancouver.us>; Mitch.Kneipp@cityofwashougal.us; David Stuebe <David.Stuebe@cityofwashougal.us>; Don Steinke <crvancouverusa@gmail.com>; Denis Hayes <denis@denishayes.com>; Shari Phiel <shari.phiel@columbian.com>; Alan Peters

<APeters@cityofcamas.us>

Subject: CLARK COUNTY CONSIDERATION OF THE CLIMATE CHANGE/HOUSING OPPORTUNITY FROM THE PROPER CLEANUP OF THE CAMAS MILL

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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”.

<image005.jpg>

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 backbone 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

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