

**From:** [Jenna Kay](#)  
**To:** [Friends of Clark County; Cnty 2025 Comp Plan](#)  
**Subject:** RE: Friends of Clark County"s Public Comment for Clark County Community Advisory Group  
**Date:** Tuesday, January 21, 2025 7:10:31 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

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Confirming receipt and got it.

Thank you,  
Jenna



**Jenna Kay** she/her/hers  
Planner III  
COMMUNITY PLANNING

564.397.4968



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**From:** Friends of Clark County <info@friendsofclarkcounty.org>  
**Sent:** Monday, January 20, 2025 9:02 AM  
**To:** Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>; Jenna Kay <Jenna.Kay@clark.wa.gov>  
**Subject:** Re: Friends of Clark County's Public Comment for Clark County Community Advisory Group

**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.

Apologies, will you please instead file this attachment for FOCC's public comment to the Clark County Climate CAG for the January 22nd meeting? We noticed a last-minute typo.

Thank you,  
FOCC

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**From:** Friends of Clark County

**Sent:** Monday, January 20, 2025 8:35 AM

**To:** Cnty 2025 Comp Plan <[comp.plan@clark.wa.gov](mailto:comp.plan@clark.wa.gov)>; [jenna.kay@clark.wa.gov](mailto:jenna.kay@clark.wa.gov)  
<[jenna.kay@clark.wa.gov](mailto:jenna.kay@clark.wa.gov)>

**Cc:** [annfoster5093@gmail.com](mailto:annfoster5093@gmail.com) <[annfoster5093@gmail.com](mailto:annfoster5093@gmail.com)>

**Subject:** Friends of Clark County's Public Comment for Clark County Community Advisory Group

Hello,

Please see the attached public comment Friends of Clark County submits to the Clark County Community Advisory Group for the January 22nd, 2025 meeting.

Thank you,

Friends of Clark County

## Friends of Clark County Public Comment on the Climate Community Advisory Group's Draft Goals and Policies

Hello Clark County staff, CAG, and Environmental Justice Coalition (EJC) members,

FOCC thanks you for your work thus far to create goals and policies for protecting Clark County residents, especially our children and grandchildren, from the dire impacts of the climate emergency by working together to recommend adaptation and mitigation measures. We recognize all of the great work that has gone into this project so far, and we are ready to provide our input as a community-based environmental advocacy organization that represents our thousands of supporters here in Clark County.

First and foremost, FOCC thanks the EJC for offering the wisdom that can only come from lived experience and ensuring that equity is incorporated into this climate work. We support the EJC's overarching equity goals and policies.

Second, FOCC urges a simple but important revision to the CAG's Draft Goals and Policies regarding forests and trees, which is to modify the CAG's draft Ecological Stewardship policy (G11, P2) from "Make a tree preservation plan and ordinance to maximize protection of trees in urban and rural areas from development in alignment with best practices and relevant state and federal laws." to "**Make a forest and tree preservation plan to protect forests and trees from damage or removal by development, mining, and wildfire in alignment with best practices and relevant state and federal laws.**"

Our reasoning is as follows:

- **Deforestation is a large contributor to unincorporated Clark County's greenhouse gas (GHG) emissions.** On page 7 of the [Greenhouse Gas Inventory](#) prepared by Parametrix, a graph shows that the county's Agriculture, Forestry, and Land Use (AFLU) emissions make up 21% of Clark County's GHG emissions, and Figure 9 from page 16 shows that a whopping 75% of our AFLU emissions are from "net forest carbon loss" (deforestation).
- **Clark County's own survey on greenhouse gas reduction solutions reveals popular support among residents for forest preservation.** Preserving existing trees in urban and rural areas ranked in the top 5 out of the 20 greenhouse gas reduction solutions that would "make things better for me and my family" according to [survey respondents in Clark County](#).

- Mature trees can sequester very large amounts of carbon dioxide. Preserving existing mature trees costs the County nothing while greatly reducing the overall CO2 load. Furthermore, the newly released [Seventh Oregon Climate Assessment](#), authored by more than 65 scientists, experts and engineers, identified that Oregon can make significant headway in curbing greenhouse gas emissions by protecting forests and managing them to increase their carbon capture and storage. Surely, this also applies to southwest Washington.
  
- **Because there are many large-scale current threats to our forest land in Clark County, it is imperative that we name them** in order for the county to implement a comprehensive and effective forest preservation plan:
  - **Mining:** [2,973.5 acres of forest-zoned land](#) have been proposed via site specific requests for surface mining overlays in unincorporated Clark County in the Comprehensive Plan update. The County has already designated mineral lands under the GMA, the County has done no study to prove any need for more surface mining, and the GMA *also* requires the County to “enhance natural resource-based industries, including productive timber, agricultural, and fisheries industries. Encourage the conservation of productive forest lands and productive agricultural lands, and discourage incompatible uses.” Clark County should not favor mining over these protected resource-based industries and should discourage incompatible uses with productive forest land (especially as forests also provide watershed services that directly contribute to the health of our agricultural and fisheries industries), so ***it is imperative to emphasize this explicitly in a plan for Clark County given the existing site specific requests***, especially as our climate and those industries that are vital to human and other species’ survival will be gravely impacted if the County ignores these protections.
  
  - **Wildfire:** The nature of the climate emergency itself and the impacts that are already underway threatens more carbon storage due to wildfire risks. Therefore, Clark County must take measures to curb the risk of wildfire, starting with the public land it manages. Recent events in California illustrate the importance of wildfire awareness and preparation. FOCC recognizes that the P1 for G14 mentions fire management, but given it is regarding promoting “sustainable forestry practices community-wide”, we assume this refers to landowners managing private lands, so ***there needs to be clear policy around county fire management of public lands***.

- **Legacy forests:** Recently, the Department of Natural Resources (DNR), who manages Clark County’s trust land, has auctioned off multiple Clark County legacy forest units, with even more being planned for sale and clearcutting as we speak. Legacy forests provide tremendous amounts of carbon sequestration, and Clark County should direct the DNR to manage our trust lands for the purposes of conservation and carbon storage. **Therefore, we support the existing policy regarding DNR forest management G14, P3.**
- FOCC supports the CAG’s draft policies around increasing urban tree canopy, but emphasizes that planting new trees pales in comparison to protecting old growth or soon-to-be old growth, so **we must ensure our forest preservation policy is as strong as possible and name forests specifically in the relevant policies.**

Additionally, FOCC urges the CAG to make these additional considerations:

- 1) **Match the City of Vancouver’s Greenhouse Gas Emissions Goals**, as the recommendations made by this CAG will be rendered toothless without an explicit GHG reduction goal, and Clark County, as well as the world, are far behind in acting meaningfully to address the climate emergency at the urgency and scale articulated by global scientific consensus. **Nothing is more important.** Therefore, we must adopt the City of Vancouver’s ambitious goals.
- 2) Modify P4 of G13/G6, “Reduce barriers to agriculture throughout Clark County such as by: providing regenerative and sustainable agriculture education, increasing access to urban agriculture (including urban farms and market gardens), supporting farmer-friendly long-term leases and programs that support land purchases for new and beginning farmers, promoting retiring farmer succession planning, supporting incubator spaces, promoting living wage agriculture jobs, and coordinating agricultural interests through the Clark County Agricultural Advisory Commission.” by adding, “**preserving agricultural-zoned land and the rural-zoned land that protects agricultural land**” and modifying the reference to the Agricultural Advisory Commission to say, “...**and other efforts as coordinated through the Agricultural Advisory Commission.**” On the former, our reasoning is simple: you cannot reduce barriers to agriculture without preserving the land on which agriculture takes place and the rural land that protects it. There are [3,068.7 acres of AG-zoned county land](#) currently at risk of conversion in the Comprehensive Plan update. On the latter, all efforts

related to supporting local agriculture **should not be limited to** being coordinated through the Agricultural Advisory Commission.

- 3) G16 should be modified from “Manage water resources sustainably to meet the needs of the public, businesses, industry, and ecosystems under changing climate conditions” to **“Manage water resources sustainably to meet the needs of the public and ecosystems under changing climate conditions.”** Additionally, ***“Preventing threats to groundwater such as mining”*** and ***“establish an in-stream minimum flow criteria and maximum temperature thresholds for all major Clark County rivers”*** should be added to the list of actions for protecting groundwater in P3 of G16.
- 4) We strongly support and emphasize Goal 18 to expand county staff capacity to support implementation of climate policies.

Thank you for your consideration,  
Friends of Clark County