From:	Jeffrey Delapena
To:	Tim Trohimovich
Cc:	Jenna Kay; Amy Koski; Jose Alvarez
Subject:	RE: Comments on Climate Policies Jan 2025 Version
Date:	Wednesday, January 22, 2025 4:07:00 PM
Attachments:	image003.png 2025-01-22 FW Comments Climate CAG Policies to Reduce GHG Emissions.pdf

Good day, Tim,

Thank you for submitting Futurewise's comments regarding CAG's Draft Goals and Policies.

I have forwarded these to members of Staff and they will be entered into the Comprehensive Index of Record.

Regards,
Jeff Delapena
Program Assistant, Clark County Community Planning

From: Tim Trohimovich <Tim@futurewise.org>
Sent: Wednesday, January 22, 2025 4:05 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Subject: Comments on Climate Policies Jan 2025 Version

Dear Members of the Climate Community Advisory Group and Staff:

Enclosed please find Futurewise's comments on the Climate Policies January 2025, Version. Thank you for considering our comments.

If you need anything else, please let me know.

Tim Trohimovich, AICP (he/him)
Director of Planning & Law

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January 22, 2025

Climate Community Advisory Group
Clark County Community Planning
Comp Plan Comments
P.O. Box 9810
Vancouver, Washington 98666

Dear Members of the Climate Community Advisory Group and Staff:

Subject: Comments on the Climate Policies January 2025, Version
Sent via email: comp.plan@clark.wa.gov

Thank you for the opportunity to comment on the Climate Policies January 2025, version. We appreciate that P2 recognizes that the climate element is to result in a reduction in greenhouse gas emissions generated by transportation and land use within unincorporated Clark County without increasing greenhouse gas emissions elsewhere in the state, to result in reductions in per capita vehicle miles traveled within unincorporated Clark County, and to meet other requirements.

Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable and opportunity-rich communities, and that protect our most valuable farmlands, forests, and water resources. We have members and supporters across Washington State including Clark County.

Overall, we support the policies. Futurewise has the following recommendations to reduce greenhouse gas pollution and per capital vehicle miles traveled.

- The recommended comprehensive plan should not approve comprehensive plan and zoning amendments that will increase greenhouse gas emissions. Amendments that increase greenhouse gas emissions include urban growth area expansions, the designation of agricultural and forest lands of long-term commercial significance, and rural population capacity increases.[1] Not include

[1] For the correlation between urban form and greenhouse pollution see Daniel Hoornweg, Lorraine Sugar, and Claudia Lorena Trejos Gomez, *Cities and Greenhouse Gas Emissions: Moving Forward* 5 URBANISATION 43, pp. 50 – 52 (2020) last accessed on Jan. 22, 2025, at: https://journals.sagepub.com/doi/pdf/10.1177/2455747120923557 and at the link on the last page of this letter with the filename: "hoornweg-et-al-2020-cities-and-greenhouse-gas-emissions-moving-forward.pdf." Urbanisation is a peer reviewed journal. See the Urbanisation webpage last accessed on Oct. 23, 2024, at: https://journals.sagepub.com/home/urb and at the link on the last page of this letter with the filename: "Urbanisation webpage.pdf."

urban growth area expansions will also save taxpayers and ratepayers money.[2]

- A peer-reviewed scientific paper has documented that to meet the necessary reductions in greenhouse gas pollution higher residential densities are needed.[3] Nationally, densities must increase on average by 19 percent.[4] The paper concluded this can be achieved by a "mix of small apartment buildings and modest single-family homes ...."[5] The comprehensive plan should incorporate these housing types and densities into the County's existing urban growth areas (UGAs). This will also help make housing more affordable.[6]
- Amend the zoning regulations to allow corner stores, cafes, day care, and other basic services in residential neighborhoods as a policy to reduce greenhouse gas pollution from transportation and to reduce per capita vehicle miles traveled. Bringing these destinations closer to homes will shorten trips and increase the ability of residents to complete these trips by walking and bicycling. This will reduce greenhouse gas emissions and provide healthy, active transportation options.
- The comprehensive plan transportation element should invest in multimodal transportation facilities and do not invest in transportation facilities that will

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[2] John Carruthers and Gudmaundur Ulfarsson, *Urban Sprawl and the Cost of Public Services* 30 ENVIRONMENT AND PLANNING B: PLANNING AND DESIGN 503, 518 (2003) last accessed on Jan. 22, 2024, at: https://www.ezview.wa.gov/Portals/_1995/Documents/Documents/Exhibit%20%23J1%20-%20Futurewise_UrbanSprawl.pdf and enclosed at the link on the last page of this letter with the filename: "Urban sprawl and the cost of public services.pdf." Environment and Planning B is peer-reviewed. Environment and Planning B Submission guidelines p. *5 last accessed on Sept. 30, 2024, at: https://journals.sagepub.com/author-instructions/EPB and enclosed at the link on the last page of this letter with the filename: "Submission Guidelines_ EPB.pdf."

[3] Benjamin Goldstein, Dimitrios Gounaridis, and Joshua P. Newell, *The carbon footprint of household energy use in the United States* 117 PROCEEDINGS OF THE NATIONAL ACADEMY OF SCIENCES OF THE UNITED STATES OF AMERICA (PNAS) 19122, p. 19122 (Aug. 11, 2020) last accessed on Jan. 22, 2025, at: https://www.pnas.org/content/117/32/19122 and at the link on the last page of this letter with the filename: "goldstein-et-al-2020-the-carbon-footprint-of-household-energy-use-in-the-united-states.pdf." PNAS is a peer-reviewed journal. PNAS Author Center last accessed on Dec. 10, 2024, at: https://www.pnas.org/author-center and at the link on the last page of this letter with the filename: "PNAS Author Center.pdf."

[4] Benjamin Goldstein, Dimitrios Gounaridis, and Joshua P. Newell, *The carbon footprint of household energy use in the United States* 117 PROCEEDINGS OF THE NATIONAL ACADEMY OF SCIENCES OF THE UNITED STATES OF AMERICA (PNAS) 19122, p. 19128 (Aug. 11, 2020).

[5] *Id.*

[6] Washington States Department of Commerce, Local Government Division Growth Management Services, *Guidance for Updating Your Housing Element: Updating your housing element to address new requirements* p. 33 (Aug. 2023) last accessed on Jan. 22, 2025, at: https://deptofcommerce.app.box.com/s/1d9d5l7g509r389fomjpowh8isjpirlh and at link on the last page of this letter with the filename: "HB 1220_Book2_Housing Element Update_230823 Final_updated 240920.pdf."

increase greenhouse gas pollution and per capita vehicle miles traveled such as general purpose arterial and highway lanes.[7]

- The Southern Resident Orca Task Force's *Final Report and Recommendations* recommends promoting "'live where you work' to reduce commutes while improving public transportation infrastructure."[8] An analysis by the National Oceanic and Atmospheric Administration and the State of Washington Department of Fish and Wildlife ranked the Lower Columbia fall tule and fall bright chinook salmon as the third highest in importance as food sources for the southern resident orcas.[9] The Lower Columbia spring chinook and the Middle Columbia fall chinook are also important food sources for the Southern Resident orcas too.[10] Living where you work is an effective mitigating measure to reduce traffic and greenhouse gas emissions along with impacts on water quality and fish and wildlife habitats and policies incorporating this measure should be included in the comprehensive plan.
- The U.S. Environmental Protection Agency (EPA) found that state and local governments can significantly reduce greenhouse gas emissions through land and materials management practices such as materials efficiency, industrial ecology, green design, land revitalization, sustainable consumption, smart growth, pollution prevention, and designing buildings that fit the environment.[11] These should be included as policies in the comprehensive plan.

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[7] Susan Handy, University of California, Davis and Marlon G. Boarnet, University of Southern California, Impact of Highway Capacity and Induced Travel on Passenger Vehicle Use and Greenhouse Gas Emissions Policy Brief pp. 3 – 8 (Sept. 30, 2014), last accessed on Jan. 22, 2025, at: https://ww2.arb.ca.gov/sites/default/files/2020-06/Impact_of_Highway_Capacity_and_Induced_Travel_on_Passenger_Vehicle_Use_and_Greenhouse_Gas_Emissions_Policy_Brief.pdf and at the link on the last page of this letter of this letter with the filename: "Impact_of_Highway_Capacity_and_Induced_Travel_on_Passenger_Vehicle_Use_and_Greenhouse_Gas_Emissions_Policy_Brief.pdf."

[8] Southern Resident Orca Task Force, *Final Report and Recommendations* p. 107 (Nov. 2019) last accessed on Jan. 22, 2025, at: https://www.orca.wa.gov/wp-content/uploads/TaskForceFinalReport-2019.pdf and at the link on the last page of this letter of this letter with the filename: "TaskForceFinalReport-2019.pdf."

[9] National Oceanic and Atmospheric Administration and the State of Washington Department of Fish and Wildlife, *Southern Resident Killer Whale Priority Chinook Stocks* p. 6 (June 22, 2018) last accessed on Jan. 9, 2025, at: https://media.fisheries.noaa.gov/dam-migration/srkw_priority_chinook_stocks_conceptual_model_report___list_22june2018.pdf and at the link on the last page of this letter with the filename: "srkw_priority_chinook_stocks_conceptual_model_report___list_22june2018.pdf."

[10] *Id.*

[11] US Environmental Protection Agency, Office of Solid Waste and Emergency Response, *Opportunities to Reduce Greenhouse Gas Emissions through Materials and Land Management Practices* pp. 19 – 28 (Sept. 2009) last accessed on Jan. 22, 2025, at:

- We recommend adding as comprehensive plan policies the strategies and actions identified as most effective to reduce vehicle use by the recent meta-analysis by Kuss and Nicholas.[12] Again, these measures can reduce greenhouse gas pollution and per capita vehicle miles traveled.

Thank you for considering our comments. If you require additional information, please contact me at telephone 206-343-0681 or email: tim@futurewise.org.

Very Truly Yours,

Tim Trohimovich, WSBA No. 22367
Director of Planning & Law

Enclosures at this link:

https://futurewiseorg.sharepoint.com/:f:/g/EgiQ5lXMaz1Bi1nkXcodtWkB9f6VS6-9rluwh8-ggMsWAA?e=PEPllM

https://www.epa.gov/sites/production/files/documents/ghg-land-materials-management.pdf and at the link on the last page of this letter with the filename: "ghg-land-materials-management.pdf."

[12] Paula Kuss and Kimberly A Nicholas, *A dozen effective interventions to reduce car use in European cities: Lessons learned from a meta-analysis and transition management* 10 CASE STUDIES ON TRANSPORT POLICY pp. 1494-1513 (Issue 3, Sept. 2022) last accessed on Jan. 22, 2025, at https://www.sciencedirect.com/science/article/pii/S2213624X22000281 and at the link on the last page of this letter with the filename: "1-s2.0-S2213624X22000281-main.pdf." Case Studies on Transport Policy is a peer reviewed journal. Case Studies On Transport Policy Guide for Authors pp. *11 – 12 last accessed on Oct. 23, 2024, at: https://www.sciencedirect.com/journal/case-studies-on-transport-policy/publish/guide-for-authors and at the link on the last page of this letter with the filename: "Case Studies on Transpo Policy Guide for authors.pdf."