

From: [Jeffrey Delapena](#)
To: [Cnty 2025 Comp Plan](#); engert23@gmail.com
Cc: [Jenna Kay](#); [Jose Alvarez](#); [Oliver Oriako](#)
Subject: RE: Comprehensive Plan Update Comments
Date: Monday, January 27, 2025 7:32:49 AM

Hello Tonya,

Thank you for submitting comments for consideration in Phase 2 of the Climate Project Timeline.

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: Clark County <webteam@clark.wa.gov>
Sent: Friday, January 24, 2025 9:25 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Subject: Comprehensive Plan Update Comments

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Submitted on Fri, 01/24/2025 - 9:24 PM

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Message Subject

Comments on Phase 2 Climate plan

Comments

Thank you for your attention and diligence in advising goals for critical outcomes.

My comments are regarding language in select goals: Whereas Goals 11, 12, and 15 focus on "Enhance... plantings and greenspaces," "natural areas and trees," and "plant more trees in rural and urban areas," the verbiage falls short of actionable and meaningful resolutions that are based in fundamental scientific guidelines. These keywords like "plantings" "greenspaces" "trees" is not enough to address biodiversity decline, which the UN states is pushing our ecosystems to the brink of collapse, and they are not enough to address the fundamental issue of carbon sequestration.

For example, focusing on "planting more trees" - completely ignores ecosystems and the roles that trees play in them as keystone species. This verbiage does nothing to speak of which type of trees and why - and does not address situations where trees may not be the appropriate addition to greenspaces and natural areas, such as in instances where the ecosystem is classified as a prairie, wetland, where shrubs and pollinator plants may be more ideal towards the ends of 1) increasing biodiversity and 2) increasing carbon sequestration. It also leaves land managers off the hook after a tree is planted - or ignores the fact that trees may already be planted in an area, but all other layers of ecosystem are void and absent, such as valuable understory plants, flowering pollinator plants, ground covers, small trees, or replacing lawn grass with wood chip mulch, which both increases carbon sequestration as well as increases biodiversity. etc.

Written as such, it also does not distinguish between "tree" and "native" or "high biodiversity supporting tree" which can be totally different. In Clark County, the majority of non-forested land was once covered in majority Oregon White Oak prairie ecosystems - and these oak trees play a pivotal role in the food web and biodiversity. As they are fire-resistant and long living, they also support large carbon sequestration potential. The amount of Oregon white oaks still standing today is a fraction of what once was - and if we want to address the climate change risks in our region, then we need to address correcting this historical ecosystem devastation. These goals as written do not address prioritizing high biodiversity supporting trees such as the Oregon white oak, and therefore would not be able to hold accountable parties for administering any potential policy.

If the goal were written in a way that focused FIRST on biodiversity and carbon sequestration potential, which by default includes the addition to tree canopy, then this would enable actionable steps to be included in policy designed for those objectives.

If the goal were written in a way that focuses on carbon sequestration, then it would allow policy to direct ecosystem retrofitting to remove grass lawns in favor of natural wood-chip substrate, which is not only beneficial for biodiversity, but carbon sequestration and water retention into our water table.

It would allow developers and industrial to be held accountable for adding native plantings, or native trees. It would also prioritize different ecosystems in different scenarios, and not just tree plantings.

See this article from Yale Environment on urban biodiversity and how the species of trees matter and not just the inclusion of trees themselves:

https://e360.yale.edu/features/urban_nature_how_to_foster_biodiversity_in_worlds_cities

The adjustment of language in these goals to focus on 1) increasing biodiversity and 2) increasing carbon sequestration capacity, not only would allow for flexibility in pathways towards achieving these goals, but it would provide a definable measures of success. Biodiversity and carbon sequestration are effects that can be measured - and a plan that includes measurable effects are more likely to contain positive data narratives, or provide feedback on goal/plan adjustment towards these aims.

Not only that - but the implementation of steps to achieve goals with language including "biodiversity" and "carbon sequestration capacity" would be able to utilize resources that are cost effective to achieve results. Currently, residents of Clark County can receive free drops of wood chip mulch from arborists under a service called "Chip Drop" - the county could look into programs similar to that one that could have multiple benefits - of circularity of resources, as well as achieving stated goals.

Thank you.