

**From:** [Jeffrey Delapena](#)  
**To:** [Cnty 2025 Comp Plan](#); [Eric Temple](#)  
**Cc:** [Jenna Kay](#); [Amy Koski](#); [Harrison Husting](#); [Jose Alvarez](#)  
**Subject:** RE: Comprehensive Plan Update Comments  
**Date:** Tuesday, January 28, 2025 1:15:10 PM

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Hello Eric,

Thank you for submitting comments for EJC's consideration regarding the Portland Vancouver Junction Railroad.

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

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**From:** Clark County <webteam@clark.wa.gov>  
**Sent:** Tuesday, January 28, 2025 1:00 PM  
**To:** Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>  
**Subject:** Comprehensive Plan Update Comments

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Submitted on Tue, 01/28/2025 - 1:00 PM

**First Name**

Eric

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Temple

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**Organization/Agency Name**

Portland Vancouver Junction Railroad

**Address**

1100 Bellevue Way NE Suite 8A Box 80  
BELLEVUE, Washington. 98004

**Message Subject**

County Railroad

**Comments**

Public Comment to the Clark County Environmental Justice Coalition

Dear Members of the Clark County Environmental Justice Coalition,

Thank you for the opportunity to discuss a matter of significant importance to our community: the proposal to develop mineral lands at the northern terminus of the Clark County-owned railroad, operated by the Portland Vancouver Junction Railroad (PVJR). This initiative not only addresses the county's pressing aggregate needs but also embodies the principles of environmental justice by promoting equitable, sustainable, and health-conscious solutions for all residents.

**Understanding Environmental Justice**

The U.S. Environmental Protection Agency defines environmental justice as "the fair treatment and meaningful involvement of all people, regardless of income, race, color, national origin, Tribal affiliation, or disability, in agency decision-making and other Federal activities that affect human health and the environment."

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This concept ensures that no group bears a disproportionate share of negative environmental consequences resulting from industrial, governmental, or commercial operations.

**Current Aggregate Transportation Challenges**

Clark County is experiencing a significant shortfall in locally sourced aggregate materials, essential for construction and infrastructure projects. With a population exceeding 500,000 and an average consumption of 9 tons of aggregate per person annually, the county requires approximately 4.5 million tons of rock each year. Due to limited local sources, this demand necessitates about 180,000 truck trips annually (assuming 25 tons per truck), leading to increased traffic congestion, road wear, and elevated greenhouse gas emissions.

## Rail Transportation: A Sustainable Alternative

Utilizing the PVJR railroad to transport aggregate offers a sustainable and efficient alternative. A single train can haul up to 10,000 tons of rock, potentially replacing nearly 150,000 truck trips per year. Rail transport is known to emit significantly less carbon dioxide per ton-mile compared to road transport, thereby reducing the county's overall carbon footprint.

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## Environmental Justice Implications

The current reliance on extensive truck transportation disproportionately affects low-income and marginalized communities, which are often situated near major transportation corridors. These communities experience higher levels of air pollution, noise, and traffic-related accidents, leading to adverse health outcomes.

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By shifting to rail transport, we can mitigate these impacts, promoting a healthier environment for all residents and adhering to environmental justice principles.

## Economic and Social Benefits

Beyond environmental advantages, this initiative promises economic benefits, including job creation in the mining and rail industries and increased local tax revenue. Reducing heavy truck traffic will also decrease road maintenance costs and enhance safety for all road users.

## Addressing Potential Environmental Concerns

While the development of new mineral extraction sites raises valid environmental concerns, such as habitat disruption and water quality issues, these can be effectively managed through stringent regulatory frameworks and best practices in sustainable mining. Implementing comprehensive environmental impact assessments and engaging in continuous dialogue with affected communities will ensure that the project proceeds responsibly.

## Conclusion

Embracing the PVJR railroad for aggregate transportation aligns with Clark County's commitment to environmental justice. It offers a practical solution to our aggregate needs while promoting sustainability, equity, and public health. I urge the Clark County Environmental Justice Coalition to support this initiative, recognizing its potential to serve as a model for responsible resource management and transportation planning.

Thank you for your consideration.

Eric Temple

President, Portland Vancouver Junction Railroad LLC

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