

From: [Jeffrey Delapena](#)
To: [Heidi Cody](#); [Cnty 2025 Comp Plan](#)
Cc: [Jenna Kay](#); [Oliver Orjiako](#); [Jose Alvarez](#)
Subject: RE: Public Comment | ACE Draft 1 - Citizens Land Use Alternative
Date: Wednesday, February 26, 2025 8:08:13 AM
Attachments: [image001.png](#)

Good day, Heidi,

Thank you for submitting ACE's policy suggestions for consideration in CAG's Draft Goals and Policies.

These will be entered into the Comprehensive Plan Index of Record.

Regards,
Jeff Delapena
Program Assistant, Clark County Community Planning

From: Heidi Cody <heidi@waconservationaction.org>
Sent: Wednesday, February 26, 2025 8:00 AM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Cc: Jenna Kay <Jenna.Kay@clark.wa.gov>; Sue Marshall <Sue.Marshall@clark.wa.gov>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>; Matt Little <mattlittle4clarkcounty@gmail.com>; Meridian Green <meridiangreen1@gmail.com>; Glen Yung <Glen.Yung@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>; aabregoviveros@swecwa.org; Diana Betancourt Macias <diana@betancourttorres.com>; Kat Holmes <kat@waconservationaction.org>; Siobhana McEwen <smcewen@swecwa.org>; Lauren Tamboer <lauren@waconservationaction.org>
Subject: Public Comment | ACE Draft 1 - Citizens Land Use Alternative

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Hello Clark County CAG, staff and Council,

Thank you for all your work on Comprehensive Planning at Clark County. On behalf of Alliance for Community Engagement (ACE) SW WA, we are pleased to submit **1.25.25. ACE Draft 1 – Citizen's Land Use Alternatives**. ACE's work on Comprehensive Planning is supported by a Dept. of Commerce grant to Washington Conservation Action. This is a living document, as explained on the first page of this PDF. We will be working with allied BIPOC community-based organizations on these suggestions, as well as hosting community education and engagement events over the next several months.

Sincerely,
Heidi Cody and Meridian Green
Alliance for Community Engagement (ACE) SW WA



Heidi Cody (she/her)

SW WA Field Manager

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ACE Coalition Manager

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Need hope? Read about our 2024 Bullitt Prize winners, Free and Raven Borsej of the Lummi Nation, emerging leaders in conservation and environmental justice [here](#).

Feb 26, 2025

Alliance for Community Engagement (ACE) SW WA

Dear Clark County Climate Advisory Group (CAG), staff and County Council:

Thank you for your hard work on the Clark County Comprehensive Plan. Alliance for Community Engagement (ACE) is a coalition of twelve environmental and environmental justice groups in SW Washington. Our work on Comprehensive Planning at Clark County and the City of Vancouver is funded by a Dept. of Commerce Grant to Washington Conservation Action. ACE/WCA is starting to work in coalition with our local BIPOC community-based organizations who are also funded to do this work. Below is the first version of policy suggestions that ACE/WCA hopes to expand, with additional input from our BIPOC allies who are the most overburdened by pollution and climate impacts, and through community engagement events we will host over the next several months.

ACE is pleased to submit this **ACE Draft 1 - Citizen's Land Use Alternatives** list of policy suggestions to you all. This draft list is a living document based on collective community input from our members, who have experience advancing equitable climate and environmental policy elsewhere. We do not expect the CAG to adopt all of these suggestions. We want to share our work with you, and plan to advocate for these suggestions via the Clark County Planning Commission, Clark County Council, and other opportunities for public input.

ACE views GHG emissions reduction, lowering vehicle miles traveled (VMTs), resilience and equity as primary concerns in our work. These topics are all required by the Climate Element of the Comprehensive Plan. **ACE also believes that climate resiliency means planning proactively and taking all possible measures to prevent climate harms first, and secondarily recovering from those impacts.** Clark County needs to plan proactively for our future.

HB 1181 mandates: "Climate change and resiliency. Ensure that comprehensive plans, development regulations, and regional policies, plans, and strategies under RCW [36.70A.210](#) and chapter [47.80](#) RCW adapt to and mitigate the effects of a changing climate; support reductions in greenhouse gas emissions and per capita vehicle miles traveled; prepare for climate impact scenarios; foster resilience to climate impacts* and natural hazards; protect and enhance environmental, economic, and human health and safety; and advance environmental justice."

We are focussed on community engagement in Comprehensive Planning at Clark County and the City of Vancouver from two angles: by suggesting policy based on collective experience, and by hosting educational community engagement events in March and April 2025. We want to elevate the voices and input of highly impacted BIPOC communities. These meetings will encourage the community to brainstorm what we would like to see the City of Vancouver and Clark County do in Comprehensive Planning and advocate for policies we support.

We call on the County Council to postpone staff addressing any Urban Growth Boundary requests until after the Comprehensive Plan deadline has passed, to allow staff to focus on other work in the Comprehensive Plan process. We support all recommendations from Friends of Clark County on Comprehensive Planning so far. We also agree with SW Washington Equity Coalition's Alondra Abrego-Viveros who says "We need more time to collaborate with staff and bring forward solutions that reflect the needs of our community."

Thank you for reading our suggestions. Please reach out with any questions to citizenplanclark@gmail.com.

Sincerely,

Heidi Cody and Meridian Green
Alliance for Community Engagement (ACE) SW WA

ACE Draft 1 - Citizen's Land Use Alternatives

- **No non-contiguous additions to the Urban Growth Boundary for any cities**
(see HB 1181, (2) Reduce sprawl. Reduce the inappropriate conversion of undeveloped land into sprawling, low-density development.)
- **Support urban and suburban density**
 - Require infill before Urban Growth Boundary (UGB) expansions are allowed
 - Support the state's [Complete Streets](#) requirement to provide equitable alternatives to car transportation and the City of Vancouver's [Complete Streets](#) program.
 - Support [15 minute neighborhoods](#), in future urban, suburban and rural planning.
 - Legalize [neighborhood cafes](#). [Link to HB 1175](#)
 - Support locally owned retail stores, cafes, and food trucks and related employment opportunities at intersections or in neighborhood centers.
- **Prioritize affordable community-based and locally owned housing**
 - Provide incentives, support and financial assistance for single family home owners to build infill housing and density by adding Accessory Dwelling Units (ADUs) and Mobile Dwelling Units (MDUs); build more duplexes and condominiums; provide larger multifamily units; convert garages; and build residences over retail.
 - Create reform policy to allow for co-housing, lot splitting, and subdivisions .
 - Protect renters from excessive or predatory rent increases.
 - Lower costs to build housing – for example by eliminating detached single-family zones.

(see HB 1181, (4) Housing. Plan for and accommodate housing affordable to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.)

SUPPORT ACE is aware that some of these ideas may pass in the WA legislature.

- **Invest in public transportation, transit-oriented development, and bike/pedestrian-oriented development.**
(see HB 1181, (3) Transportation. Encourage efficient multimodal transportation systems that will reduce greenhouse gas emissions and per capita vehicle miles traveled, and are based on regional priorities and [coordinated with county and city comprehensive plans](#).)
- **Prioritize economic development that supports climate resilience, reduces VMTs and GHGs**
 - Develop 15-minute neighborhoods in unincorporated Clark County including Orchards, Salmon Creek, Hazel Dell, and Felida
 - Support bike shops, local ownership/small businesses
 - Invest in technical training/support for weatherization, electrification, and repair shops.

(see HB 1181, (5) Economic development. Encourage economic development throughout the state that is consistent with adopted comprehensive plans, promote economic opportunity for all citizens of this state, especially for unemployed and for

disadvantaged persons, promote the retention and expansion of existing businesses and recruitment of new businesses, recognize regional differences impacting economic development opportunities, and encourage growth in areas experiencing insufficient economic growth, all within the capacities of the state's natural resources, public services, and public facilities.)

- **Protect and enhance water quality in aquifers, rivers, streams and lakes**
 - Address and take action to eliminate “forever chemicals” (PFAs) in Clark County waterways and aquifers, algal blooms in local lakes, springs, etc.
 - Create policy to enhance rainwater retention throughout the county and expand wetland areas to protect against drought and fire while improving water quality throughout the County.
 - Develop programs to increase the presence of beavers and related techniques to retain water in local waterways to improve habitat for all species and to create a more fire-resistance landscape
 - Include a policy that prohibits commercial use of land on or bordering any wetlands, streams, or habitat that have known endangered species regardless of mitigation options.
 - Prohibit Clark County’s Noxious Weed Management from spraying chemicals at wetlands as mandated by the Clean Water Act.
 - Support/incentivize decarbonizing and de-pesticiding the landscape industry.
 - Maintain or enhance summer flows in all County rivers and streams.
 - Maintain or lower present temperature regimes in County waters.
 - Create policy to expand wetlands, add tree canopy and prevent removal of forests and any shade producing trees.
 - Expand and protect the County’s tree canopy. Large, mature trees are excellent at carbon sequestration.

- Create policy requiring the use of native plants in landscaping, green spaces and parks.
(See HB 1181, (10) Environment. Protect and enhance the environment and enhance the state's high quality of life, including air and water quality, and the availability of water.)

- **Plan for food security**
 - Establish a goal of zero loss of agricultural land to development in the Comp Plan update, as well as essential rural buffer lands that protect those lands, for climate resiliency.
 - Assess how much agricultural land needs to be set aside for local food production.
 - **Assess food supply needs for various disaster events.**
 - Support the creation of [food forests](#) and other permaculture techniques for food production throughout the county.
 - Support the creation of community-owned cooperative food markets.

SUPPORT ACE supports the current goal in the Climate Element draft that reads: “Promote resilient local food economies and local, economically viable agricultural farm businesses.” There are 6 policies

that specify the expansion of local food security and the food related economy, food production, preservation of existing agricultural and resource lands, agricultural infrastructure food distribution, food sales and markets.

- **Include policy to retain ALL structurally mature/complex forests of any size over 1 acre in Clark County. Require specific language that distinguishes forests from tree farms. Intact forests trap carbon and help birds.**

Examples include Dabbler and other proposals in the Yacolt Burn and Urban forests (such as the 35 acre/ 60+ year old Douglas fir forest on VIC/192nd)

- **All applications for a Surface Mining Overlay (for mining purposes) must be followed by a complete Environmental Impact Statement (EIS)..**

(Per HB 1181 - 10. Address the requirement “to **protect** and **enhance** fish & wildlife habitat and protect the environment” by Including a policy to maximize disincentives/fines/future constraints for illegal mining or other unpermitted harmful activities by requiring the property owner to pay for restoration of the property and adjacent affected land or waterways.)

- **Adopt/match the City of Vancouver’s Greenhouse Gas Emissions Goals**

An 80% reduction in GHG emissions by municipal operations by 2025. An 80% reduction in GHG emissions by the Vancouver community by 2030. Carbon neutrality by both municipal operations and the Vancouver community by 2040.

- **Restrict new gas stations**

- Develop policy along the lines of California liquor licensing policy that restricts new gas stations
- Require EV charging in all new gas stations

MISSING POLICY PIECES

- **Assess how much agricultural land needs to be set aside for local food production** (see “Plan for Food Security” above)
- **Require fossil fuel businesses and polluting energy industries to remove obsolete infrastructure**

ACE does not see anything in the draft Comp Plan that addresses infrastructure left behind from polluting fuel and other industries that will, or have already, become obsolete as we reach our goals of electrifying buildings and transportation. Examples of obsolete infrastructure include pipelines, gas tanks and the Camas paper mill.

Industries that have a track record of not cleaning up their messes—namely nuclear, gas stations and unused natural gas infrastructure— should not be allowed to create new infrastructure in

Clark County. Unless there is a robust and enforceable policy in place, as selling fossil fuel products becomes less profitable, certain property and infrastructure like gas lines and fuel tanks may be abandoned, leaving Clark County citizens to deal with toxic materials and risks.

Suggested language: “Implement policy requiring fossil fuel businesses and other polluting energy industries to remove aging and unneeded/unused infrastructure. Require polluting industries to provide adequate insurance to cover damages in case of catastrophic events.”

- **Require insurance from polluting industries to cover catastrophic damage**

Below this line is feedback that has not yet been incorporated. We are still working on this so please feel free to add.

- Address shortfalls in levels of service (LOS) within County parks. We are **way** behind. Need more neighborhood and close-in parks, not parks on the peripheries. Need more trails, paths, and walks. Implement the County Trails Plan.
- Implement Lights Out/Dark Sky lighting initiatives for all county-owned buildings. Encourage businesses and residences to adopt Dark Sky lighting.
- Reduce bird collisions with glass by using bird-friendly building designs for any new or remodeled county buildings. Encourage the use of bird-friendly glass by businesses and residences.
- Protect pollinators:
 - Phase out pesticide use/ replace with organic or ecological measures
 - Reduce light, water and noise pollution
 - Conserve natural soil cover
 - Replace invasive plants with natives
 - Reduce mowing
 - Pollinator habitat enhancement, restoration and protection - wild native plants year round

Resilience Hub

A resilience hub is a community-focused facility designed to support and enhance resilience in the face of various challenges, such as natural disasters, climate change, and social inequities. Here are the key components that typically go into a resilience hub:

1. ****Emergency Preparedness****:
 - Emergency supplies (food, water, first aid kits)
 - Communication systems (radios, phones)
 - Training and workshops on emergency response
2. ****Community Support Services****:
 - Access to mental health resources
 - Social services (housing assistance, job training)
 - Intergenerational programs to foster community ties
3. ****Sustainable Infrastructure****:
 - Renewable energy sources (solar panels, wind turbines)
 - Green building materials and practices
 - Rainwater harvesting and efficient water management systems

4. **Education and Training**:
 - Workshops on resilience-building skills (gardening, cooking, first aid)
 - Educational programs on climate change and sustainability
 - Leadership training for community members
5. **Public Health and Safety**:
 - Health screenings and wellness programs
 - Resources for managing public health crises
 - Facilities for sheltering during emergencies
6. **Community Engagement and Empowerment**:
 - Opportunities for community members to participate in decision-making
 - Platforms for sharing resources and skills
 - Networking events to connect residents with local organizations
7. **Adaptation and Mitigation Strategies**:
 - Planning for climate resilience (flood defenses, heat mitigation)
 - Urban greening initiatives (parks, tree planting)
 - Infrastructure improvements to withstand extreme weather
8. **Technology and Innovation**:
 - Access to information technology for communication and education
 - Data collection and analysis tools for monitoring community needs
 - Innovation labs for developing local solutions
9. **Collaboration with Local Organizations**:
 - Partnerships with NGOs, government agencies, and businesses etc.
 - Coordinated responses to community needs and emergencies
 - Shared resources for efficiency and effectiveness
10. **Cultural and Recreational Spaces**:
 - Areas for community gatherings and cultural events
 - Spaces for physical activities and wellness programs
 - Art and creativity initiatives to foster community identity
11. **Refillery Hubs**
 - TBD

By integrating these components, resilience hubs aim to create strong, interconnected communities that can effectively respond to and recover from various challenges.

