

From: [Jeffrey Delapena](#)
To: [SDLegal](#); [Cnty Community Planning](#)
Cc: [Chuck Ealy](#); [Rebecca Messinger](#)
Subject: RE: Salmon Creek - Re-zoning Proposal for Busiess Park
Date: Monday, June 2, 2025 9:36:13 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good day, Sheila & Charleton,

Thank you for submitting comments regarding the 2025 Comprehensive Plan Update. These will be brought to the attention of the Planning Commission and entered into the Index of Record.

I am CC'ing Rebecca Messinger from the County Manager's office to forward your message to the Council.

Best,



Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558



From: SDLegal <sjd14535@yahoo.com>
Sent: Sunday, June 1, 2025 12:34 PM
To: Cnty Community Planning <CommunityPlanning@clark.wa.gov>
Cc: Chuck Ealy <chuck.ealy@peri-usa.com>
Subject: Salmon Creek - Re-zoning Proposal for Busiess Park

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May 30, 2025

Clark County Planning Commission & County Council

Public Comment Submission

communityplanning@clark.wa.gov

Subject: Formal Opposition to Business Park Expansion Adjacent to NE 50th Ave, Salmon Creek, Mill Creek Overlay, and AG-20 Farmland

Dear Clark County Planning Commission and County Council Members,

As a resident of the Ramble Creek area, I am submitting this formal and vigorous objection to the proposed expansion of Business Park (BP) zoning east of NE 50th Avenue between NE 179th Street and Salmon Creek. The area in question borders the Mill Creek Overlay District, AG-20 farmland, Urban Reserve lands, and the WSU Vancouver campus, and includes residential zones like R-5 and rural communities such as mine.

While I acknowledge the existence of Business Park zoning nearby, the current zone—established in 2016—remains largely underutilized, with only two active businesses operating on the land after nearly a decade. Expanding this underdeveloped zone is neither justified by demand nor supported by infrastructure. It would compound planning failures, violate legal and environmental obligations, and impose an unfair and disproportionate burden on adjacent residential and agricultural communities.

1. The Proposal Violates Legal and Planning Standards

The proposed expansion is inconsistent with multiple governing legal frameworks, including:

- Clark County Code Title 40.250.060 – which guides the Mill Creek Overlay and prioritizes rural character, environmental protection, and smart subarea development.
- Clark County's Comprehensive Plan, which promotes compact urban growth, preservation of farmland, and environmental stewardship.
- The Washington State Growth Management Act (RCW 36.70A.040) – which mandates that zoning changes be consistent with comprehensive planning, phased infrastructure, and rural area protection.

This proposal Fails all three tests. It introduces intense commercial-industrial zoning in an area that:

- Lacks roads, transit, water, and sewer infrastructure
- Is surrounded by rural neighborhoods and farms
- Contains protected wetlands that flow into the Salmon Creek watershed

RCW 36.70A.040 – GMA Planning Requirements

(<https://apps.leg.wa.gov/RCW/default.aspx?cite=36.70A.040>)



2. Incompatible with Infrastructure and Environment

The area under consideration is ill-suited for Business Park expansion for the following reasons:

- NE Salmon Creek Avenue is a rural road with no room for expansion
- NE 179th Street is already at or over capacity
- Utilities in the area are not built for industrial-scale development
- The land contains critical wetlands that drain directly into Salmon Creek, a vital environmental and ecological corridor

Industrial runoff, increased impervious surfaces, and vehicular traffic from BP uses will directly harm this ecosystem, violating the intent of the County's Critical Areas Ordinance.



3. Loss of Agricultural Land Threatens Long-Term Sustainability

This proposal directly targets AG-20 farmland, some of the last productive agricultural space near Vancouver. Replacing farmland with warehousing and commercial infrastructure:

- Reduces local food resilience
- Destroys green buffers critical for environmental and climate mitigation
- Contradicts Clark County's farmland preservation goals

Once converted, farmland does not come back. This is a permanent and irreversible loss of valuable resource land, especially when other, better-suited areas exist.

4. Disproportionate Burden on a Rural and Residential Community

This expansion would place industrial use next to homes, horse properties, farms, and open space, introducing:

- Industrial noise and light
- Truck traffic
- Decreased property values
- Higher taxes based on speculative development value
- Additional permitting burdens for simple rural activities like keeping livestock

Meanwhile, more appropriate areas for Business Park development exist near NE 199th Street, where:

- I-5 access is immediate
- Infrastructure is already developed
- Impacts to farms, critical areas, and residential communities are minimized

This is not just poor planning — it's inequitable planning.



5. Misuse of the Vacant Buildable Lands Model (VBLM)

The justification for the BP expansion relies on flawed assumptions in the VBLM, claiming a reduction in “employment capacity” due to mixed-use and high-density housing. This outdated model:

- Ignores current development trends, where mixed-use zones often perform better economically and environmentally
- Assumes a 60/40 housing-to-jobs split, while real-world use and the county’s own code support 90/10 or 80/20 splits
- Treats this rural area as a “fix” for speculative employment capacity lost elsewhere — at our expense

The VBLM should be modernized, not used to justify paving farmland.



Conclusion and Call to Action

This proposal is:

- Legally unsound
- Environmentally reckless
- Economically shortsighted
- Deeply unfair to the residents of Salmon Creek's residential communities and/or surrounding areas, as an attempt to place the burden of picking up the increase in taxes on these residents.

I strongly urge the Planning Commission and County Council to:

1. Reject the Business Park expansion near NE 50th Avenue and Salmon Creek
2. Preserve R-5, AG-20, Urban Reserve, and Mill Creek Overlay protections
3. Direct all future Business Park expansion to the NE 199th area near I-5, where infrastructure supports it
4. Modernize the VBLM and zoning assumptions to reflect sustainable growth patterns

Thank you for your time, and for honoring your Legal and Ethical responsibility to plan for a future that respects rural communities, farmland, and environmental integrity.

Sincerely,
Sheila Dolan and Charleton Ealy
Clark County Residents



Sincere regards,
Sheila Dolan

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