

From: [Jeffrey Delapena](#)
To: [Cnty 2025 Comp Plan](#); sylviaJtrujillo@yahoo.com
Cc: [Rebecca Messinger](#)
Subject: RE: Comprehensive Plan Update Comments
Date: Monday, June 2, 2025 9:27:57 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good day, Sylvia,

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: Clark County <webteam@clark.wa.gov>
Sent: Sunday, June 1, 2025 5:51 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Subject: Comprehensive Plan Update Comments

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Submitted on Sun, 06/01/2025 - 5:50 PM

First Name

Concerned Residents of Ramble Creek

Last Name

Submitted by Sylvia Trujillo

Email Address

sylviajtrujillo@yahoo.com

Organization/Agency Name

Concerned Residents of Ramble Creek

Address

17980 NE 47th Avenue
Vancouver, Washington. 98686

Message Subject

Opposition to Proposal 2 & 3

Comments

Clark County Planning Commission & County Council

Public Comment Submission

Email: communityplanning@clark.wa.gov

RE: Formal Objection to Proposed Business Park Expansion Near NE 50th Avenue and Salmon Creek (2045 Comprehensive Plan – UGA Expansion, Alternatives 2 and 3)

Dear Planning Commissioners and County Council Members:

I am writing on behalf of myself and the concerned residents of Ramble Creek, a residential community located just blocks from the proposed Business Park (BP) expansion near NE 50th Avenue and NE 179th Street. We are deeply troubled by the direction and implications of the UGA expansion under Alternatives 2 and 3 in the 2045 Comprehensive Plan.

We submit this comment to preserve our legal standing and our right to appeal under RCW 36.70A.290 if this proposal is adopted. Our concerns include serious environmental, land use, infrastructure, and procedural issues that must be addressed under both state law and Clark County Code. This expansion would impose disproportionate and irreversible harm on our neighborhood and the surrounding ecosystem.

1. Inconsistency with the Growth Management Act and Clark County's Comprehensive Plan

The proposal is inconsistent with the Growth Management Act (RCW 36.70A.040), which

mandates that counties plan for growth in ways that are environmentally responsible, phased, and coordinated. The affected area is:

- Directly adjacent to the Mill Creek Overlay District, AG-20 farmland, and designated Urban Reserve
- Zoned R-5 and AG-20, serving as a buffer between urbanized areas and ecologically sensitive zones
- Home to multiple wetlands, drainage features, and critical habitat that contribute to the Salmon Creek watershed

The expansion of industrial zoning into this area without a full environmental review violates the GMA's protections for critical areas (RCW 36.70A.060, RCW 36.70A.172) and the County's obligation to use best available science in land use decisions.

2. Severe Environmental and Hydrological Impact

The Salmon Creek watershed is already under strain. The proposed BP expansion would introduce large areas of impervious surface (pavement, rooftops, driveways), exacerbating:

- Stormwater runoff and flooding risks
- Wetland degradation and habitat fragmentation
- Pollutant discharge into surface and groundwater systems

Unlike R-5 or agricultural uses, which maintain substantial pervious cover, Business Park developments create compacted soils and heat islands that disrupt natural infiltration and hydrological cycles. This threatens the health of Salmon Creek, its wildlife corridors, and water quality for residents downstream.

No Environmental Impact Statement (EIS) has yet been released to demonstrate mitigation of these harms. We understand from the County's SEPA Determination of Significance that an EIS is planned but not complete. Until that analysis is published, no zoning changes of this magnitude should be considered or approved.

3. Premature and Unjustified Expansion of Business Park Zoning

The existing Business Park zoning nearby (established in 2016) remains largely undeveloped. Only two entities operate in the area, and there is no demonstrated market demand for additional BP acreage. This expansion would be:

- Inefficient land use
- Contrary to smart growth principles
- Incompatible with existing residential and agricultural uses

Meanwhile, more appropriate locations for Business Park expansion—such as near NE 199th Street and I-5—exist, with better infrastructure, freeway access, and fewer environmental conflicts. This would avoid disproportionately burdening our community with industrial zoning.

4. Conflict with Agricultural and Rural Preservation Goals

The conversion of AG-20 land and rural residential zones violates the intent of RCW 36.70A.060(1) and Clark County's Comprehensive Plan, which prioritize long-term preservation of farmland and open space. These lands are essential for:

- Local food production
- Carbon sequestration
- Groundwater recharge
- Climate resilience

Business Park development on farmland is irreversible and incompatible with the County's stated commitment to rural character and environmental sustainability.

5. Transportation & Infrastructure Deficiencies

The area lacks adequate transportation infrastructure to support intensified industrial use:

- NE 179th Street is already overburdened
- NE Salmon Creek Avenue cannot be expanded
- Internal roads were not designed for commercial freight or employee commuter traffic

Adding a Business Park here would exacerbate traffic congestion and degrade safety for pedestrians, school buses, cyclists, and rural drivers.

6. Unfair Community Burden and Procedural Concerns

Expanding BP zoning into a community that is:

- Already doing its part by hosting an underutilized BP zone
- Adjacent to natural resources and Urban Reserve lands
- Populated by residents, farms, and small-acreage landowners with horses, livestock, and family dwellings

... is inequitable and undermines public trust in land use planning.

It also raises procedural concerns, including:

- The absence of a site-specific SEPA review
- Lack of transparency in UGA boundary changes
- Failure to provide localized cumulative impact analysis

7. Request for Action

On behalf of our community, we respectfully request that the County:

- Reject the proposed Business Park expansion near NE 50th Ave and Salmon Creek
- Preserve existing R-5, AG-20, and Urban Reserve zoning
- Redirect any required industrial zoning to NE 199th and I-5
- Ensure full SEPA compliance, including robust analysis of alternatives
- Engage directly with our neighborhood in any further discussions

8. Preservation of Right to Appeal

This comment is submitted as part of the official public record and is intended to preserve our collective right to appeal under RCW 36.70A.290. If the zoning amendment is adopted without addressing the concerns outlined above, we will consider filing a petition with the Washington State Growth Management Hearings Board and engaging legal counsel.

Thank you for your time, and for your commitment to thoughtful, equitable, and environmentally responsible planning.

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